original to JOA
copy to Admin/Nolan/Johnston

RUBICON **MAIN FILE**

CERTIFIED MAIL
RETURN RECEIPT REQUESTED
7005 1820 0002 6253 8706

AI 1468

March 30, 2006

Mr. Bryan Johnston
LA Department of Environmental Quality
Permits Division
P.O. Box 4313
Baton Rouge, LA 70821-4313

RE: 2005 Emission Reduction Credit (ERC) Annual Report, Rubicon LLC

Dear Mr. Johnston:

Attached is the 2005 ERC Annual Report as required by LAC 33:III.613.B.2. If you require any further information, please call Phil Kerr at (225) 242-5027.

I certify, under provisions in Louisiana and United States law which provide criminal penalties for false statements, that based on information and belief formed after reasonable inquiry, the statements and information contained in this ERC Annual Report, are true, accurate, and complete.

Sincerely,

C. Eric Phillips
Vice President and General Manager
March 30, 2006

Attachments

2006 APR -3 PM 3:06

RUBICON LLC - P.O. BOX 517 – GEISMAR, LA 70734 – PHONE (225) 673-6141 – (225) 383-7771 – FAX (225) 673-6442

ERC Annual Report for the period January 1, 2005 - December 31, 2005

NOx

Company: Rubicon LLC
Physical Address, City, LA Zip: 9156 Highway 75, Geismar, LA 70734
Parish: Ascension

Previous Year-End "Pending" Balance: 96.40

Previous Year-End "Approved" Balance: 116.54

Project	Brief Description of Project Which Generated or Required Use of ERC, or Transfer Information, etc. §613.A.1.a		Affected Permit Number(s)	Transaction Date §613.A.1.h	ERC Applied For But Not Yet Approved[1] §613.A.1.b	Approved ERC Deposits[1] §613.A.1.c	ERC Used as Offsets §613.A.1.d	ERC Which Expired §613.A.1.e	ERC Transferred to Another Party §613.A.1.f	Adjustments for New Emission Reduction Requirements[2] §613.A.1.g	Adjustments for Netting[3] §613.A.1.g	ERC Balance §613.A.1.i
1	TDI Unit Shutdown		2329-V3	3/30/2006	139.14							139.14
				Year-End "Pending" Balance:	235.54						Year-End "Approved" Balance:	116.54

DEPOSITS

Project	Date of Actual Emissions Decrease §613.A.2.d	Baseline Period Calendar Year(s) §613.A.2.a	Pre-project Actuals During the Baseline Period §613.A.2.b	Pre-project Allowables §613.A.2.c	Post-project Allowables §613.A.2.e	Emission Change §613.A.2.f
1	7/8/05	2003, 2004	146.47	170.70	7.33	-139.14

Instructions:

1.) Only transactions occurring during the previous calendar year should be entered. Submittal of this form cannot serve as an ERC application.

2.) Enter one transaction per line. Transactions should be input chronologically to the extent practicable.

3.) Amounts should be specified in tons per year (TPY).

4.) This form is being provided to facilitate the proper submittal of information required by §613.B.2. If a reporting facility chooses not to use this form, its submittal must address the information specified in §613.A.

5.) Pursuant to §613.C, the following certifying statement should be included and signed by a *responsible official as defined in LAC 33:III.502*:

"I certify, under provisions in Louisiana and United States law which provide criminal penalties for false statements, that based on information and belief formed after reasonable inquiry, the statements and information contained in this *ERC Annual Report, are true, accurate, and complete.*"

This certification should include the full name, title, and signature of the certifying official and the date of signature.

6.) Mail to:

LOUISIANA DEPT. OF ENVIRONMENTAL QUALITY
OFFICE OF ENV. SERVICES, PERMITS DIVISION
P.O. BOX 4313
BATON ROUGE, LA 70821-4313
ATTN: KEITH JORDAN

[1]For each pending application and approved deposit, provide the requested information on the "Deposits" table. Project numbers should correspond to the main table.

[2]See §607.C.3. Discuss any adjustments for new emission reduction requirements in the cover letter.

[3]See §607.D.

ERC Annual Report for the period January 1, 2005 - December 31, 2005

VOC

Company Rubicon LLC
Physical Address, City, LA Zip 9156 Highway 75, Gelsmar, LA 70734
Parish Ascension

Previous Year-End "Pending" Balance: 175.37

Previous Year-End "Approved" Balance: 0.0

Project	Brief Description of Project Which Generated or Required Use of ERC, or Transfer Information, etc. §613.A.1.a		Affected Permit Number(s)	Transaction Date §613.A.1.h	ERC Applied For But Not Yet Approved[1] §613.A.1.b	Approved ERC Deposits[1] §613.A.1.c	ERC Used as Offsets §613.A.1.d	ERC Which Expired §613.A.1.e	ERC Transferred to Another Party §613.A.1.f	Adjustments for New Emission Reduction Requirements[2] §613.A.1.g	Adjustments for Netting[3] §613.A.1.g	ERC Balance §613.A.1.i
1	TDA Unit Shutdown		2277-V0	12/22/2005	103.81						-60.72	43.09
2	TDI Unit Shutdown		2329-V3	3/30/2006	4.26							4.26

Year-End "Pending" Balance: 179.74

Year-End "Approved" Balance: 0.00

DEPOSITS

Project	Date of Actual Emissions Decrease §613.A.2.d	Baseline Period Calendar Year(s) §613.A.2.a	Pre-project Actuals During the Baseline Period §613.A.2.b	Pre-project Allowables §613.A.2.c	Post-project Allowables §613.A.2.e	Emission Change §613.A.2.f
1	12/26/01	2000, 2001	141.65	103.81	0	-103.81
2	7/8/05	2003, 2004	5.09	10.29	0.83	-4.26

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