

EXECUTIVE SUMMARY - ENFORCEMENT MATTER
DOCKET NO.: 2008-0628-AIR-E **TCEQ ID:** RN102536307 **CASE NO.:** 35737
RESPONDENT NAME: BP Amoco Chemical Company

ORDER TYPE:		
<input checked="" type="checkbox"/> 1660 AGREED ORDER	<input type="checkbox"/> FINDINGS AGREED ORDER	<input type="checkbox"/> FINDINGS ORDER FOLLOWING SOAH HEARING
<input type="checkbox"/> FINDINGS DEFAULT ORDER	<input type="checkbox"/> SHUTDOWN ORDER	<input type="checkbox"/> IMMINENT AND SUBSTANTIAL ENDANGERMENT ORDER
<input type="checkbox"/> AMENDED ORDER	<input type="checkbox"/> EMERGENCY ORDER	
CASE TYPE:		
<input checked="" type="checkbox"/> AIR	<input type="checkbox"/> MULTI-MEDIA (check all that apply)	<input type="checkbox"/> INDUSTRIAL AND HAZARDOUS WASTE
<input type="checkbox"/> PUBLIC WATER SUPPLY	<input type="checkbox"/> PETROLEUM STORAGE TANKS	<input type="checkbox"/> OCCUPATIONAL CERTIFICATION
<input type="checkbox"/> WATER QUALITY	<input type="checkbox"/> SEWAGE SLUDGE	<input type="checkbox"/> UNDERGROUND INJECTION CONTROL
<input type="checkbox"/> MUNICIPAL SOLID WASTE	<input type="checkbox"/> RADIOACTIVE WASTE	<input type="checkbox"/> DRY CLEANER REGISTRATION
<p>SITE WHERE VIOLATION(S) OCCURRED: BP Texas City Chemical Plant B, 2800 Farm-to-Market Road 519 East, Texas City, Galveston County</p> <p>TYPE OF OPERATION: Chemical plant</p> <p>SMALL BUSINESS: <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p>OTHER SIGNIFICANT MATTERS: There are no complaints. There is no record of additional pending enforcement actions regarding this facility location.</p> <p>INTERESTED PARTIES: No one other than the ED and the Respondent has expressed an interest in this matter.</p> <p>COMMENTS RECEIVED: The <i>Texas Register</i> comment period expired on August 18, 2008. No comments were received.</p> <p>CONTACTS AND MAILING LIST: TCEQ Attorney/SEP Coordinator: None TCEQ Enforcement Coordinator: Mr. Jorge Ibarra, P.E., Enforcement Division, Enforcement Team 3, MC R-04, (817) 588-5890; Mr. Bryan Sinclair, Enforcement Division, MC 219, (512) 239-2171 Respondent: Ms. Susan Dio, Plant Manager, Texas City Chemicals, 2800 Farm-to-Market Road 519 East, Texas City, Texas 77590 Mr. Mark Clingan, Air Supervisor, BP Amoco Chemical Company, 2800 Farm-to-Market Road 519 East, Texas City, Texas 77590 Respondent's Attorney: Not represented by counsel on this enforcement matter</p>		

CHIEF CLERKS OFFICE
 2008 SEP 22 AM 11:32
 TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

VIOLATION SUMMARY CHART:

VIOLATION INFORMATION	PENALTY CONSIDERATIONS	CORRECTIVE ACTIONS TAKEN/REQUIRED
<p>Type of Investigation: <input type="checkbox"/> Complaint <input type="checkbox"/> Routine <input type="checkbox"/> Enforcement Follow-up <input checked="" type="checkbox"/> Records Review</p> <p>Date(s) of Complaints Relating to this Case: None</p> <p>Date of Record Review Relating to this Case: April 2, 2008</p> <p>Date of NOE Relating to this Case: April 8, 2008 (NOE)</p> <p>Background Facts: This was a record review.</p> <p>AIR</p> <p>1) Failure to maintain an emission rate below the maximum allowable emission limits from the POLYB Flare [emission point number ("EPN FL-351")]. Specifically, 5,088 pounds of volatile organic compounds were emitted on December 19, 2007 in a 6 hour, 2 minute period [30 TEX. ADMIN. CODE § 116.715(a), Permit No. 1176, Special Condition No. 1, and TEX. HEALTH & SAFETY CODE § 382.085(b)].</p> <p>2) Failure to operate the POLYB Flare (EPN FL-351) during the emissions event of December 19, 2007 with a flame present at all times [30 TEX. ADMIN. CODE § 116.715(a), Permit No. 1176, Special Condition No. 4B, 40 CODE OF FEDERAL REGULATIONS § 60.18(c)(2), and TEX. HEALTH & SAFETY CODE § 382.085(b)].</p>	<p>Total Assessed: \$10,000</p> <p>Total Deferred: \$2,000 <input checked="" type="checkbox"/> Expedited Settlement <input type="checkbox"/> Financial Inability to Pay</p> <p>SEP Conditional Offset: \$0</p> <p>Total Paid to General Revenue: \$8,000</p> <p>Site Compliance History Classification <input type="checkbox"/> High <input checked="" type="checkbox"/> Average <input type="checkbox"/> Poor</p> <p>Person Compliance History Classification <input type="checkbox"/> High <input checked="" type="checkbox"/> Average <input type="checkbox"/> Poor</p> <p>Major Source: <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Applicable Penalty Policy: September 2002</p>	<p>Ordering Provisions:</p> <p>The Order will require the Respondent to:</p> <p>a) Immediately after the effective date of this Agreed Order, begin operating the POLYB Flare (EPN FL-351) with a flame present at all times;</p> <p>b) Within 30 days after the effective date of this Agreed Order, develop and begin implementing measures to improve design, operations, and/or maintenance practices to prevent the reoccurrence of emissions events similar to the emissions event that occurred on December 19, 2007; and</p> <p>c) Within 45 days after the effective date of this Agreed Order, submit written certification and include detailed supporting documentation including photographs, receipts, and/or other records to demonstrate compliance with Ordering Provisions a. and b.</p>

Additional ID No(s): Air Account No. GB0001R



Penalty Calculation Worksheet (PCW)

Policy Revision 2 (September 2002)

PCW Revision March 8, 2008

DATES	Assigned	14-Apr-2008	Screening	15-Apr-2008	EPA Due	
	PCW	16-Apr-2008				

RESPONDENT/FACILITY INFORMATION		
Respondent	BP Amoco Chemical Company	
Reg. Ent. Ref. No.	RN102536307	
Facility/Site Region	12-Houston	Major/Minor Source
		Major

CASE INFORMATION			
Enf./Case ID No.	35737	No. of Violations	1
Docket No.	2008-0628-AIR-E	Order Type	1660
Media Program(s)	Air	Enf. Coordinator	Jorge Ibarra, P.E.
Multi-Media		EC's Team	Enforcement Team 3
Admin. Penalty \$ Limit Minimum	\$0	Maximum	\$10,000

Penalty Calculation Section

TOTAL BASE PENALTY (Sum of violation base penalties)	Subtotal 1	\$5,000
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ADJUSTMENTS (+/-) TO SUBTOTAL 1		
Subtotals 2-7 are obtained by multiplying the Total Base Penalty (Subtotal 1) by the indicated percentage.		
Compliance History	174% Enhancement	Subtotals 2, 3, & 7
		\$8,700

Notes
The Respondent was issued eight NOV's with the same/similar type of violations, three NOV's without the same/similar type of violations, four 1660 Agreed Orders, three Findings Orders, and submitted 23 Notices of Intent and two Disclosure of Violations.

Culpability	No	0% Enhancement	Subtotal 4	\$0
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Notes
The Respondent does not meet the culpability criteria.

Good Faith Effort to Comply	0% Reduction	Subtotal 5	\$0
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	Before NOV	NOV to EDRP/Settlement Offer
Extraordinary		
Ordinary		
N/A	X	(mark with x)

Notes
The Respondent does not meet the good faith criteria.

Total EB Amounts	\$218	0% Enhancement*	Subtotal 6	\$0
Approx. Cost of Compliance	\$5,000	*Capped at the Total EB \$ Amount		

SUM OF SUBTOTALS 1-7	Final Subtotal	\$13,700
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OTHER FACTORS AS JUSTICE MAY REQUIRE	0%	Adjustment	\$0
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Reduces or enhances the Final Subtotal by the indicated percentage.

Notes

Final Penalty Amount \$13,700

STATUTORY LIMIT ADJUSTMENT	Final Assessed Penalty	\$10,000
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DEFERRAL	20% Reduction	Adjustment	-\$2,000
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Reduces the Final Assessed Penalty by the indicated percentage. (Enter number only; e.g. 20 for 20% reduction.)

Notes

Deferral offered for expedited settlement.

PAYABLE PENALTY	\$8,000
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Screening Date 15-Apr-2008

Docket No. 2008-0628-AIR-E

PCW

Respondent BP Amoco Chemical Company

Policy Revision 2 (September 2002)

Case ID No. 35737

PCW Revision March 8, 2008

Reg. Ent. Reference No: RN102536307

Media [Statute] Air

Enf. Coordinator Jorge Ibarra, P.E.

Compliance History Worksheet

>> Compliance History Site Enhancement (Subtotal 2)

Component	Number of...	Enter Number Here	Adjust.
NOVs	Written NOVs with same or similar violations as those in the current enforcement action (number of NOVs meeting criteria)	8	40%
	Other written NOVs	3	6%
Orders	Any agreed final enforcement orders containing a denial of liability (number of orders meeting criteria)	4	80%
	Any adjudicated final enforcement orders, agreed final enforcement orders without a denial of liability, or default orders of this state or the federal government, or any final prohibitory emergency orders issued by the commission	3	75%
Judgments and Consent Decrees	Any non-adjudicated final court judgments or consent decrees containing a denial of liability of this state or the federal government (number of judgements or consent decrees meeting criteria)	0	0%
	Any adjudicated final court judgments and default judgments, or non-adjudicated final court judgments or consent decrees without a denial of liability, of this state or the federal government	0	0%
Convictions	Any criminal convictions of this state or the federal government (number of counts)	0	0%
Emissions	Chronic excessive emissions events (number of events)	0	0%
Audits	Letters notifying the executive director of an intended audit conducted under the Texas Environmental, Health, and Safety Audit Privilege Act, 74th Legislature, 1995 (number of audits for which notices were submitted)	23	-23%
	Disclosures of violations under the Texas Environmental, Health, and Safety Audit Privilege Act, 74th Legislature, 1995 (number of audits for which violations were disclosed)	2	-4%
Please Enter Yes or No			
Other	Environmental management systems in place for one year or more	No	0%
	Voluntary on-site compliance assessments conducted by the executive director under a special assistance program	No	0%
	Participation in a voluntary pollution reduction program	No	0%
	Early compliance with, or offer of a product that meets future state or federal government environmental requirements	No	0%

Adjustment Percentage (Subtotal 2) 174%

>> Repeat Violator (Subtotal 3)

No

Adjustment Percentage (Subtotal 3) 0%

>> Compliance History Person Classification (Subtotal 7)

Average Performer

Adjustment Percentage (Subtotal 7) 0%

>> Compliance History Summary

Compliance History Notes

The Respondent was issued eight NOVs with the same/similar type of violations, three NOVs without the same/similar type of violations, four 1660 Agreed Orders, three Findings Orders, and submitted 23 Notices of Intent and two Disclosure of Violations.

Total Adjustment Percentage (Subtotals 2, 3, & 7) 174%

Screening Date 15-Apr-2008	Docket No. 2008-0628-AIR-E	PCW		
Respondent BP Amoco Chemical Company	<i>Policy Revision 2 (September 2002)</i>			
Case ID No. 35737	<i>PCW Revision March 8, 2008</i>			
Reg. Ent. Reference No. RN102536307				
Media [Statute] Air				
Enf. Coordinator Jorge Ibarra, P.E.				
Violation Number <input type="text" value="1"/>				
Rule Cite(s)	30 Tex. Admin. Code § 116.715(a), Flexible Permit No. 1176, Special Condition Nos. 1 and 4B, Code of Federal Regulations § 60.18(c)(2), and Tex. Health & Safety Code § 382.085(b)			
Violation Description	Failed to maintain an emission rate below the maximum allowable emission limits from the POLYB Flare [emission point number ("EPN FL-351")] and to operate the POLYB Flare (EPN FL-351) during the emissions event with a flame present at all times. Specifically, 5,088 pounds of volatile organic compounds were emitted on December 19, 2007 in a 6 hour, 2 minute period. Since these emissions could have been foreseen and avoided, the Respondent failed to meet the demonstrations for an affirmative defense in 30 Tex. Admin. Code § 101.222(b).			
Base Penalty		<input type="text" value="\$10,000"/>		
>> Environmental, Property and Human Health Matrix				
OR	Harm			
	Release	Major	Moderate	Minor
	Actual	<input type="text" value=""/>	<input checked="" type="text" value="x"/>	<input type="text" value=""/>
	Potential	<input type="text" value=""/>	<input type="text" value=""/>	<input type="text" value=""/>
		Percent	<input type="text" value="50%"/>	
>> Programmatic Matrix				
	Falsification	Major	Moderate	Minor
	<input type="text" value=""/>	<input type="text" value=""/>	<input type="text" value=""/>	<input type="text" value=""/>
		Percent	<input type="text" value="0%"/>	
Matrix Notes	Human health or the environment in the Houston-Galveston-Brazoria ozone nonattainment area has been exposed to significant amounts of pollutants which did not exceed levels that are protective of human health or environmental receptors as a result of the violation.			
Adjustment		<input type="text" value="\$5,000"/>		
		<input type="text" value="\$5,000"/>		
Violation Events				
Number of Violation Events		<input type="text" value="1"/>	Number of violation days	
		<input type="text" value="1"/>		
<i>mark only one with an x</i>	daily	<input type="text" value=""/>	Violation Base Penalty	
	monthly	<input checked="" type="text" value="x"/>		
	quarterly	<input type="text" value=""/>		
	semiannual	<input type="text" value=""/>		
	annual	<input type="text" value=""/>		
	single event	<input type="text" value=""/>		
		Violation Base Penalty	<input type="text" value="\$5,000"/>	
One monthly event is recommended.				
Economic Benefit (EB) for this violation		Statutory Limit Test		
Estimated EB Amount		<input type="text" value="\$218"/>	Violation Final Penalty Total	
			<input type="text" value="\$13,700"/>	
This violation Final Assessed Penalty (adjusted for limits)			<input type="text" value="\$10,000"/>	

Economic Benefit Worksheet

Respondent BP Amoco Chemical Company
 Case ID No. 35737
 Reg. Ent. Reference No. RN102536307
 Media Air
 Violation No. 1

Percent Interest	Years of Depreciation
5.0	15

Item Description	Item Cost	Date Required	Final Date	Yrs	Interest Saved	Onetime Costs	EB Amount
Delayed Costs							
Equipment				0.0	\$0	\$0	\$0
Buildings				0.0	\$0	\$0	\$0
Other (as needed)				0.0	\$0	\$0	\$0
Engineering/construction				0.0	\$0	\$0	\$0
Land				0.0	\$0	n/a	\$0
Record Keeping System				0.0	\$0	n/a	\$0
Training/Sampling				0.0	\$0	n/a	\$0
Remediation/Disposal				0.0	\$0	n/a	\$0
Permit Costs				0.0	\$0	n/a	\$0
Other (as needed)	\$5,000	19-Dec-2007	1-Nov-2008	0.9	\$218	n/a	\$218

Notes for DELAYED costs
 Estimated cost to maintain an emission rate below the maximum allowable emission limits by developing and implementing measures to improve design, operations, and/or maintenance practices to prevent the reoccurrence of emissions events. Date Required is the date of the emissions event, Final Date is the expected compliance date.

Item Description	Item Cost	Date Required	Final Date	Yrs	Interest Saved	Onetime Costs	EB Amount
Avoided Costs							
ANNUALIZE [1] avoided costs before entering item (except for one-time avoided costs)							
Disposal				0.0	\$0	\$0	\$0
Personnel				0.0	\$0	\$0	\$0
Inspection/Reporting/Sampling				0.0	\$0	\$0	\$0
Supplies/equipment				0.0	\$0	\$0	\$0
Financial Assurance [2]				0.0	\$0	\$0	\$0
ONE-TIME avoided costs [3]				0.0	\$0	\$0	\$0
Other (as needed)				0.0	\$0	\$0	\$0

Notes for AVOIDED costs

Approx. Cost of Compliance \$5,000 **TOTAL** \$218

Compliance History

Customer/Respondent/Owner-Operator:	CN600126775	BP Amoco Chemical Company	Classification: AVERAGE	Rating: 2.79
Regulated Entity:	RN102536307	BP TEXAS CITY CHEMICAL PLANT B	Classification: AVERAGE	Site Rating: 3.43
ID Number(s):	WASTEWATER	PERMIT	WQ0000452000	
	WASTEWATER	PERMIT	TPDES0004766	
	WASTEWATER	PERMIT	TX0004766	
	INDUSTRIAL AND HAZARDOUS WASTE GENERATION	EPA ID	TXD005942438	
	INDUSTRIAL AND HAZARDOUS WASTE GENERATION	SOLID WASTE REGISTRATION # (SWR)	30373	
	AIR NEW SOURCE PERMITS	PERMIT	23872	
	AIR NEW SOURCE PERMITS	PERMIT	31936	
	AIR NEW SOURCE PERMITS	PERMIT	31758	
	AIR NEW SOURCE PERMITS	PERMIT	33496	
	AIR NEW SOURCE PERMITS	PERMIT	36246	
	AIR NEW SOURCE PERMITS	PERMIT	43910	
	AIR NEW SOURCE PERMITS	PERMIT	46046	
	AIR NEW SOURCE PERMITS	PERMIT	47876	
	AIR NEW SOURCE PERMITS	PERMIT	47273	
	AIR NEW SOURCE PERMITS	ACCOUNT NUMBER	GB0001R	
	AIR NEW SOURCE PERMITS	PERMIT	1176	
	AIR NEW SOURCE PERMITS	PERMIT	2244	
	AIR NEW SOURCE PERMITS	PERMIT	2725	
	AIR NEW SOURCE PERMITS	PERMIT	5873	
	AIR NEW SOURCE PERMITS	PERMIT	6841	
	AIR NEW SOURCE PERMITS	PERMIT	8978	
	AIR NEW SOURCE PERMITS	PERMIT	10070	
	AIR NEW SOURCE PERMITS	PERMIT	11911	
	AIR NEW SOURCE PERMITS	PERMIT	11987	
	AIR NEW SOURCE PERMITS	PERMIT	12181	
	AIR NEW SOURCE PERMITS	PERMIT	12225	
	AIR NEW SOURCE PERMITS	PERMIT	15915	
	AIR NEW SOURCE PERMITS	PERMIT	15916	
	AIR NEW SOURCE PERMITS	REGISTRATION	71903	
	AIR NEW SOURCE PERMITS	EPA ID	PSDTX459	
	AIR NEW SOURCE PERMITS	EPA ID	PSDTX619	
	AIR NEW SOURCE PERMITS	AFS NUM	4816700002	
	AIR NEW SOURCE PERMITS	REGISTRATION	74946	
	AIR NEW SOURCE PERMITS	EPA ID	PSDTX459M2	
	AIR NEW SOURCE PERMITS	EPA ID	PSDTX984	
	AIR NEW SOURCE PERMITS	EPA ID	PSDTX782	
	AIR NEW SOURCE PERMITS	PERMIT	81500	
	AIR NEW SOURCE PERMITS	REGISTRATION	84314	
	AIR NEW SOURCE PERMITS	REGISTRATION	84306	
	AIR NEW SOURCE PERMITS	REGISTRATION	83420	
	AIR NEW SOURCE PERMITS	REGISTRATION	83658	
	AIR NEW SOURCE PERMITS	EPA ID	PSDTX782M1	
	AIR NEW SOURCE PERMITS	REGISTRATION	84581	
	AIR OPERATING PERMITS	ACCOUNT NUMBER	GB0001R	
	AIR OPERATING PERMITS	PERMIT	2329	
	AIR OPERATING PERMITS	PERMIT	1513	
	WATER LICENSING	LICENSE	0840213	
	WASTEWATER LICENSING	LICENSE	WQ0000452000	
	IHW CORRECTIVE ACTION	SOLID WASTE REGISTRATION # (SWR)	30373	
Location:	2800 FM 519 RD E, TEXAS CITY, TX, 77590		Rating Date: 9/1/2007 Repeat Violator: NO	
TCEQ Region:	REGION 12 - HOUSTON			
Date Compliance History Prepared:	April 14, 2008			
Agency Decision Requiring Compliance History:	Enforcement			
Compliance Period:	April 14, 2003 to April 14, 2008			

TCEQ Staff Member to Contact for Additional Information Regarding this Compliance History

Name: Jorge Ibarra, P.E. Phone: (817) 588-5890

Site Compliance History Components

- | | |
|--|------------|
| 1. Has the site been in existence and/or operation for the full five year compliance period? | Yes |
| 2. Has there been a (known) change in ownership of the site during the compliance period? | No |
| 3. If Yes, who is the current owner? | <u>N/A</u> |
| 4. If Yes, who was/were the prior owner(s)? | <u>N/A</u> |
| 5. When did the change(s) in ownership occur? | <u>N/A</u> |

Components (Multimedia) for the Site :

A. Final Enforcement Orders, court judgements, and consent decrees of the state of Texas and the federal government.

- Effective Date: 06/13/2004 ADMINORDER 2003-1426-AIR-E
Classification: Moderate
Citation: 30 TAC Chapter 101, SubChapter A 101.20(2)
30 TAC Chapter 115, SubChapter D 115.355(1)
30 TAC Chapter 116, SubChapter B 116.115(c)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.180(b)(1)
Rqmt Prov: 1176 PERMIT
Description: Failure to conduct fugitive monitoring in accordance with 40 CFR 60, Reference Method 21.
- Effective Date: 10/10/2005 ADMINORDER 2005-0153-AIR-E
Classification: Moderate
Citation: 30 TAC Chapter 101, SubChapter F 101.211(c)
5C THC Chapter 382, SubChapter A 382.085(b)
Rqmt Prov: 1176/PSDTX782, SC#1 PERMIT
Description: Failed to submit the final report no later than two weeks after the end of the scheduled activity.
- Classification: Minor
Citation: 30 TAC Chapter 116, SubChapter G 116.715(a)
5C THC Chapter 382, SubChapter A 382.085(b)
Rqmt Prov: 1176/PSD-TX-782 SC 1 OP
Description: Failed to comply with permitted emission limits
- Effective Date: 02/05/2006 ADMINORDER 2005-0361-AIR-E
Classification: Moderate
Citation: 30 TAC Chapter 115, SubChapter D 115.352(4)
30 TAC Chapter 116, SubChapter G 116.715(a)
5C THC Chapter 382, SubChapter A 382.085(b)
Rqmt Prov: SC No. 1 PERMIT
Description: Failure to obtain regulatory authority or to meet the demonstration requirements of 30 Tex. Admin. Code § 101.222 for emissions from the API Separator 2 that occurred on April 7, 2004.
- Classification: Moderate
Citation: 30 TAC Chapter 116, SubChapter G 116.715(a)
5C THC Chapter 382, SubChapter A 382.085(b)
Rqmt Prov: 1176/PSDTX782, SC#1 PERMIT
Description: Failure to obtain regulatory authority or to meet the requirements of 30 Tex. Admin. Code § 101.211 (relating to scheduled maintenance, startup, and shutdown recording and recordkeeping requirements) for emissions from the paraxylene unit 2 that occurred from September 9 to September 10, 2004.
- Classification: Minor
Citation: 30 TAC Chapter 101, SubChapter F 101.211(c)
5C THC Chapter 382, SubChapter A 382.085(b)
Description: Failed to submit a copy of the final record for any scheduled maintenance, startup, or shutdown activity to the commission office for the region in which the facility is located no later than two weeks after the end of the scheduled activity.
- Effective Date: 02/20/2006 ADMINORDER 2005-1151-AIR-E
Classification: Minor
Citation: 30 TAC Chapter 101, SubChapter F 101.201(c)
5C THC Chapter 382, SubChapter A 382.085(b)
Description: Failed to submit a final report within the required 2 week time frame for an emissions event that occurred in the Styrene Unit (Incident #47950) on 10/17/04.
- Classification: Moderate
Citation: 30 TAC Chapter 116, SubChapter B 116.110(a)

5C THC Chapter 382, SubChapter A 382.085(b)

Description: BP failed to prevent the unauthorized release of air contaminants into the atmosphere.

Effective Date: 07/14/2006 ADMINORDER 2006-0068-AIR-E

Classification: Moderate

Citation: 30 TAC Chapter 116, SubChapter G 116.715(a)

5C THC Chapter 382, SubChapter A 382.085(b)

Rqmt Prov: 1176/PSD-TX-782 PERMIT

Special Condition No. 1 PERMIT

Description: Failure to prevent unauthorized emissions during a February 1, 2004 emissions event.

Effective Date: 11/18/2006 ADMINORDER 2006-0692-AIR-E

Classification: Moderate

Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)

5C THC Chapter 382, SubChapter D 382.085(b)

Rqmt Prov: TCEQ Permit #31936, SC#1 PERMIT

Description: BP failed to prevent a leak in Tower T-201.

Effective Date: 11/18/2006 ADMINORDER 2006-0401-AIR-E

Classification: Moderate

Citation: 30 TAC Chapter 116, SubChapter G 116.715(a)

5C THC Chapter 382, SubChapter D 382.085(b)

Rqmt Prov: No. 1176, Special Condition No. 1 PERMIT

Description: Failure to prevent unauthorized emissions during a July 20, 2005 emissions event.

B. Any criminal convictions of the state of Texas and the federal government.

N/A

C. Chronic excessive emissions events.

N/A

D. The approval dates of investigations. (CCEDS Inv. Track. No.)

1	04/21/2003	(157556)
2	05/23/2003	(295154)
3	06/18/2003	(295156)
4	07/22/2003	(295159)
5	08/25/2003	(295161)
6	09/02/2003	(26097)
7	09/23/2003	(295163)
8	10/21/2003	(295165)
9	11/24/2003	(295166)
10	11/25/2003	(255824)
11	12/19/2003	(295167)
12	01/26/2004	(295168)
13	02/01/2004	(436439)
14	02/23/2004	(295148)
15	02/25/2004	(436458)
16	03/12/2004	(295151)
17	04/13/2004	(295152)
18	05/05/2004	(265665)
19	05/14/2004	(351984)
20	06/02/2004	(274031)
21	06/02/2004	(273864)
22	06/02/2004	(274032)
23	06/02/2004	(274033)
24	06/02/2004	(274035)
25	06/02/2004	(274036)
26	06/21/2004	(295157)
27	06/30/2004	(274037)
28	06/30/2004	(275209)
29	06/30/2004	(275991)
30	07/01/2004	(274701)
31	07/01/2004	(275894)
32	07/01/2004	(275974)
33	07/14/2004	(257762)
34	07/26/2004	(351985)
35	07/28/2004	(274384)
36	08/13/2004	(281234)
37	08/13/2004	(277683)

38	08/19/2004	(351986)
39	08/28/2004	(269455)
40	08/28/2004	(266782)
41	08/28/2004	(267397)
42	09/21/2004	(351987)
43	10/19/2004	(290042)
44	10/19/2004	(290962)
45	10/22/2004	(351988)
46	11/16/2004	(381799)
47	12/09/2004	(338318)
48	12/09/2004	(338310)
49	12/09/2004	(336053)
50	12/09/2004	(338291)
51	12/10/2004	(335955)
52	12/11/2004	(342049)
53	12/13/2004	(280389)
54	12/16/2004	(276474)
55	12/20/2004	(381800)
56	12/21/2004	(342250)
57	12/30/2004	(341018)
58	01/04/2005	(343339)
59	01/05/2005	(341019)
60	01/07/2005	(346291)
61	01/24/2005	(381801)
62	01/24/2005	(336670)
63	02/16/2005	(336733)
64	02/18/2005	(419628)
65	02/23/2005	(432187)
66	03/15/2005	(419629)
67	03/16/2005	(336660)
68	03/16/2005	(346083)
69	04/05/2005	(345056)
70	04/18/2005	(419630)
71	05/11/2005	(419631)
72	05/20/2005	(392544)
73	05/26/2005	(372740)
74	06/13/2005	(419632)
75	06/20/2005	(395958)
76	07/22/2005	(440763)
77	07/26/2005	(401423)
78	07/26/2005	(400884)
79	07/26/2005	(401242)
80	08/01/2005	(402505)
81	08/04/2005	(402931)
82	08/15/2005	(440764)
83	09/19/2005	(440765)
84	09/20/2005	(431115)
85	10/24/2005	(468317)
86	11/21/2005	(468318)
87	12/20/2005	(468319)
88	01/06/2006	(439401)
89	01/20/2006	(468320)
90	01/26/2006	(439527)
91	02/17/2006	(468315)
92	03/16/2006	(468316)
93	03/29/2006	(454789)
94	04/21/2006	(498113)
95	05/09/2006	(461813)
96	05/16/2006	(498114)
97	05/17/2006	(458044)
98	05/22/2006	(460772)
99	05/31/2006	(465862)
100	06/28/2006	(498115)
101	07/07/2006	(480573)
102	07/18/2006	(486045)
103	07/24/2006	(520127)
104	08/09/2006	(497082)
105	08/21/2006	(520128)

106 08/28/2006 (489588)
 107 09/18/2006 (520129)
 108 11/20/2006 (544395)
 109 11/22/2006 (514027)
 110 11/29/2006 (531912)
 111 12/05/2006 (544394)
 112 12/13/2006 (533682)
 113 12/21/2006 (533409)
 114 01/08/2007 (534572)
 115 01/09/2007 (575150)
 116 01/31/2007 (517145)
 117 03/19/2007 (575145)
 118 04/16/2007 (575146)
 119 05/15/2007 (575149)
 120 05/18/2007 (575147)
 121 06/20/2007 (575148)
 122 07/17/2007 (601564)
 123 07/30/2007 (563704)
 124 08/03/2007 (563702)
 125 08/06/2007 (563706)
 126 08/10/2007 (570948)
 127 08/20/2007 (571579)
 128 08/21/2007 (601565)
 129 08/21/2007 (571073)
 130 08/22/2007 (571560)
 131 08/29/2007 (573431)
 132 09/06/2007 (571584)
 133 09/06/2007 (574072)
 134 09/20/2007 (601566)
 135 09/21/2007 (594108)
 136 10/23/2007 (619473)
 137 11/06/2007 (596181)
 138 11/19/2007 (619474)
 139 11/27/2007 (597422)
 140 12/18/2007 (619475)
 141 12/20/2007 (597461)
 142 01/17/2008 (619476)
 143 02/25/2008 (610856)
 144 02/25/2008 (618987)
 145 03/06/2008 (636437)
 146 04/08/2008 (640347)
 147 04/08/2008 (638876)

E. Written notices of violations (NOV). (CCEDS Inv. Track. No.)

Date: 05/07/2004 (265665)
 Self Report? NO Classification: Minor
 Citation: 30 TAC Chapter 101, SubChapter A 101.20(2)
 30 TAC Chapter 115, SubChapter D 115.352(2)
 30 TAC Chapter 116, SubChapter G 116.715(a)
 40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.168(f)(1)
 Rqmt Prov: PERMIT 1176 SC 36 I and PSD 782
 Description: Failure to repair a leaky valve within 15 days
 Self Report? NO Classification: Minor
 Citation: 30 TAC Chapter 101, SubChapter A 101.20(1)
 40 CFR Chapter 60, SubChapter C, PT 60, SubPT VV 60.482-7(c)
 Description: Failure to monitor a repaired valve for two successive leak free months.
 Date: 07/14/2004 (257762)
 Self Report? NO Classification: Moderate
 Citation: 30 TAC Chapter 116, SubChapter G 116.715(a)
 5C THC Chapter 382, SubChapter A 382.085(b)
 Rqmt Prov: PERMIT TCEQ FLEX AIR PERMIT 1176/PSDTX782, SC#1
 Description: Exceeded permit limits during an avoidable emissions event.
 Date: 08/28/2004 (269455)
 Self Report? NO Classification: Moderate
 Citation: 30 TAC Chapter 116, SubChapter G 116.715(a)
 5C THC Chapter 382, SubChapter A 382.085(b)
 Description: Exceeded permit limits.

Date: 08/28/2004 (267397)
 Self Report? NO Classification: Moderate
 Citation: 30 TAC Chapter 116, SubChapter G 116.715(a)
 5C THC Chapter 382, SubChapter A 382.085(b)
 Rqmt Prov: PA PERMIT 1176 AND PSD-TX-782, GC #8
 Description: Exceeded VOC permit limit.
 Date: 12/10/2004 (335955)
 Self Report? NO Classification: Minor
 Citation: 30 TAC Chapter 101, SubChapter F 101.201(c)
 Description: BP failed to submit a final report for an emissions event (Incident # 41371), that occurred June 16, 2004 in the Paraxylene Unit No. 1, in a timely manner.
 Self Report? NO Classification: Moderate
 Citation: 30 TAC Chapter 116, SubChapter G 116.715(a)
 5C THC Chapter 382, SubChapter A 382.085(b)
 Rqmt Prov: PERMIT 1176/PSDTX782, SC #1
 Description: BP failed to maintain a parallel connection from the battery to the compressor which caused the compressor to shutdown.
 Date: 01/27/2006 (439527)
 Self Report? NO Classification: Moderate
 Citation: 30 TAC Chapter 116, SubChapter G 116.715(a)
 5C THC Chapter 382, SubChapter A 382.085(b)
 Rqmt Prov: PERMIT TCEQ Flexible Permit #1176, SC #1
 Description: Failed to enable the audible alarms for Tank F-1118 to inform the operator, when tank roof landed on its leg supports.
 Date: 05/10/2006 (461813)
 Self Report? NO Classification: Moderate
 Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
 5C THC Chapter 382, SubChapter D 382.085(b)
 Rqmt Prov: PERMIT TCEQ Permit No. 31936
 Description: BP failed to install a valve properly.
 Date: 11/22/2006 (514027)
 Self Report? NO Classification: Minor
 Citation: 30 TAC Chapter 290, SubChapter D 290.45(f)(5)
 Description: Purchased Water
 Failure to secure a contract which specifies a maximum hourly purchase rate for systems which purchase water under direct pressure.
 Self Report? NO Classification: Moderate
 Citation: 30 TAC Chapter 290, SubChapter D 290.46(e)
 Description: Operating Practices for Public Water Systems
 Failure to operate a non-transient, non-community water system, such as yours, under the direct supervision of a licensed water works operator.
 Date: 08/03/2007 (563702)
 Self Report? NO Classification: Moderate
 Citation: 30 TAC Chapter 116, SubChapter G 116.715(a)
 5C THC Chapter 382, SubChapter D 382.085(b)
 Rqmt Prov: PERMIT No. 1176, Special Condition No. 1
 Description: BP failed to meet the affirmative defense.
 Date: 12/20/2007 (597461)
 Self Report? NO Classification: Minor
 Citation: 30 TAC Chapter 101, SubChapter F 101.211(b)(1)(H)
 Description: BP failed to include on the final report all individually listed compounds were known to have been released during the emissions event.
 Self Report? NO Classification: Minor
 Citation: 30 TAC Chapter 101, SubChapter F 101.211(b)(1)(I)
 Description: BP failed to identify on the final report the authorization number of the permit governing the facilities involved in the emissions event.
 Date: 04/08/2008 (638876)
 Self Report? NO Classification: Moderate
 Citation: 30 TAC Chapter 116, SubChapter G 116.715(a)
 5C THSC Chapter 382 382.085(b)
 Rqmt Prov: PA TCEQ Air Flexible Permit No. 1176, SC #1
 Description: BP failed to prevent the compressor trip that caused this emissions event.

F. Environmental audits.

Notice of Intent Date: 12/10/2002 (33125)

Disclosure Date: 07/15/2003
 Viol. Classification: Minor
 Citation: 40 CFR Chapter 61, SubChapter C, PT 61, SubPT FF 61.357(d)(2)
 40 CFR Chapter 61, SubChapter C, PT 61, SubPT FF 61.357(d)(8)
 Description: Failed to ensure the benzene waste operations annual report is updated accurately and contains all information regarding summary of inspections before submittal.

Viol. Classification: Moderate
 Citation: 40 CFR Chapter 61, SubChapter C, PT 61, SubPT FF 61.356(g)
 Description: Failed to maintain records of deficiencies during visual equipment inspections

Viol. Classification: Moderate
 Citation: 40 CFR Chapter 61, SubChapter C, PT 61, SubPT FF 61.349(a)(1)(ii)(B)
 Description: Failed to provide a car-seal that is required on some equipment installed on closed vent systems.

Viol. Classification: Minor
 Citation: 40 CFR Chapter 61, SubChapter C, PT 61, SubPT FF 61.357(d)(7)(iv)
 Description: Failed to report flare pilot outages on the benzene waste operations quarterly report.

Notice of Intent Date: 06/16/2004 (345925)
 No DOV Associated

Notice of Intent Date: 02/23/2006 (458557)
 Disclosure Date: 09/01/2006
 Viol. Classification: Moderate
 Citation: 30 TAC Chapter 115, SubChapter H 115.781(a)(5)
 Description: Failure to tag 28 valves
 Viol. Classification: Moderate
 Citation: 30 TAC Chapter 115, SubChapter H 115.781
 Description: Failure to include 34 sources in LDAR program.

Notice of Intent Date: 07/06/2006 (487745)
 No DOV Associated

Notice of Intent Date: 01/08/2007 (543529)
 No DOV Associated

Notice of Intent Date: 01/08/2007 (543530)
 No DOV Associated

Notice of Intent Date: 01/08/2007 (543531)
 No DOV Associated

Notice of Intent Date: 01/15/2007 (543525)
 No DOV Associated

Notice of Intent Date: 01/15/2007 (543528)
 No DOV Associated

Notice of Intent Date: 02/27/2007 (554847)
 No DOV Associated

Notice of Intent Date: 05/25/2007 (563636)
 No DOV Associated

Notice of Intent Date: 05/31/2007 (571651)
 No DOV Associated

Notice of Intent Date: 06/08/2007 (565939)
 No DOV Associated

Notice of Intent Date: 08/08/2007 (593459)
 No DOV Associated

Notice of Intent Date: 09/10/2007 (596475)
 No DOV Associated

Notice of Intent Date: 09/11/2007 (596527)
 No DOV Associated

Notice of Intent Date: 09/25/2007 (618192)
 No DOV Associated

Notice of Intent Date: 10/05/2007 (618167)
 No DOV Associated

Notice of Intent Date: 10/05/2007 (618181)
 No DOV Associated

Notice of Intent Date: 02/11/2008 (639342)
 No DOV Associated

Notice of Intent Date: 02/13/2008 (639362)

No DOV Associated
Notice of Intent Date: 03/12/2008 (646278)
No DOV Associated
Notice of Intent Date: 03/31/2008 (646279)
No DOV Associated
Notice of Intent Date: 03/31/2008 (646285)
No DOV Associated

G. Type of environmental management systems (EMSs).

N/A

H. Voluntary on-site compliance assessment dates.

N/A

I. Participation in a voluntary pollution reduction program.

N/A

J. Early compliance.

N/A

Sites Outside of Texas

N/A

TEXAS COMMISSION ON ENVIRONMENTAL QUALITY



TEXAS
COMMISSION
ON ENVIRONMENTAL
QUALITY

2008 SEP 22 AM 11:32

CHIEF CLERKS OFFICE

IN THE MATTER OF AN
ENFORCEMENT ACTION
CONCERNING
BP AMOCO CHEMICAL COMPANY
RN102536307

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§

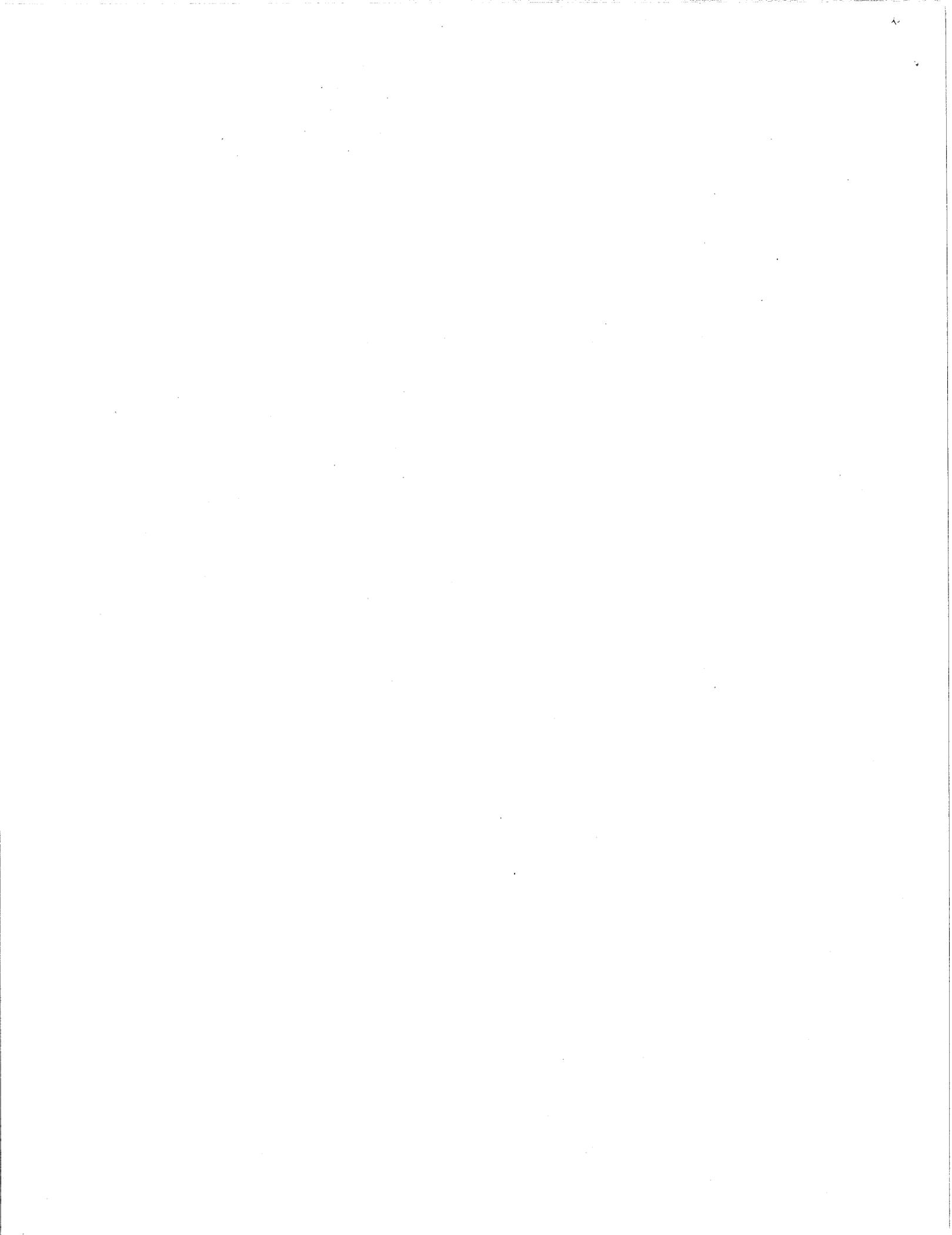
BEFORE THE
TEXAS COMMISSION ON
ENVIRONMENTAL QUALITY

AGREED ORDER
DOCKET NO. 2008-0628-AIR-E

I. JURISDICTION AND STIPULATIONS

At its _____ agenda, the Texas Commission on Environmental Quality ("the Commission" or "TCEQ") considered this agreement of the parties, resolving an enforcement action regarding BP Amoco Chemical Company ("the Respondent") under the authority of TEX. HEALTH & SAFETY CODE ch. 382 and TEX. WATER CODE ch. 7. The Executive Director of the TCEQ, through the Enforcement Division, and the Respondent appear before the Commission and together stipulate that:

1. The Respondent owns and operates a chemical plant located at 2800 Farm-to-Market Road 519 East in Texas City, Galveston County, Texas (the "Plant").
2. The Plant consists of one or more sources as defined in TEX. HEALTH & SAFETY CODE § 382.003(12).
3. The Commission and the Respondent agree that the Commission has jurisdiction to enter this Agreed Order, and that the Respondent is subject to the Commission's jurisdiction.
4. The Respondent received notice of the violations alleged in Section II ("Allegations") on or about April 13, 2008.
5. The occurrence of any violation is in dispute and the entry of this Agreed Order shall not constitute an admission by the Respondent of any violation alleged in Section II ("Allegations"), nor of any statute or rule.
6. An administrative penalty in the amount of Ten Thousand Dollars (\$10,000) is assessed by the Commission in settlement of the violations alleged in Section II ("Allegations"). The Respondent has paid Eight Thousand Dollars (\$8,000) of the administrative penalty and Two Thousand Dollars (\$2,000) is deferred contingent upon the Respondent's timely and satisfactory compliance with all the terms of this Agreed Order. The deferred amount will be waived upon full



compliance with the terms of this Agreed Order. If the Respondent fails to timely and satisfactorily comply with all requirements of this Agreed Order, the Executive Director may require the Respondent to pay all or part of the deferred penalty.

7. Any notice and procedures, which might otherwise be authorized or required in this action, are waived in the interest of a more timely resolution of the matter.
8. The Executive Director of the TCEQ and the Respondent have agreed on a settlement of the matters alleged in this enforcement action, subject to the approval of the Commission.
9. The Executive Director may, without further notice or hearing, refer this matter to the Office of the Attorney General of the State of Texas ("OAG") for further enforcement proceedings if the Executive Director determines that the Respondent has not complied with one or more of the terms or conditions in this Agreed Order.
10. This Agreed Order shall terminate five years from its effective date or upon compliance with all the terms and conditions set forth in this Agreed Order, whichever is later.
11. The provisions of this Agreed Order are deemed severable and, if a court of competent jurisdiction or other appropriate authority deems any provision of this Agreed Order unenforceable, the remaining provisions shall be valid and enforceable.

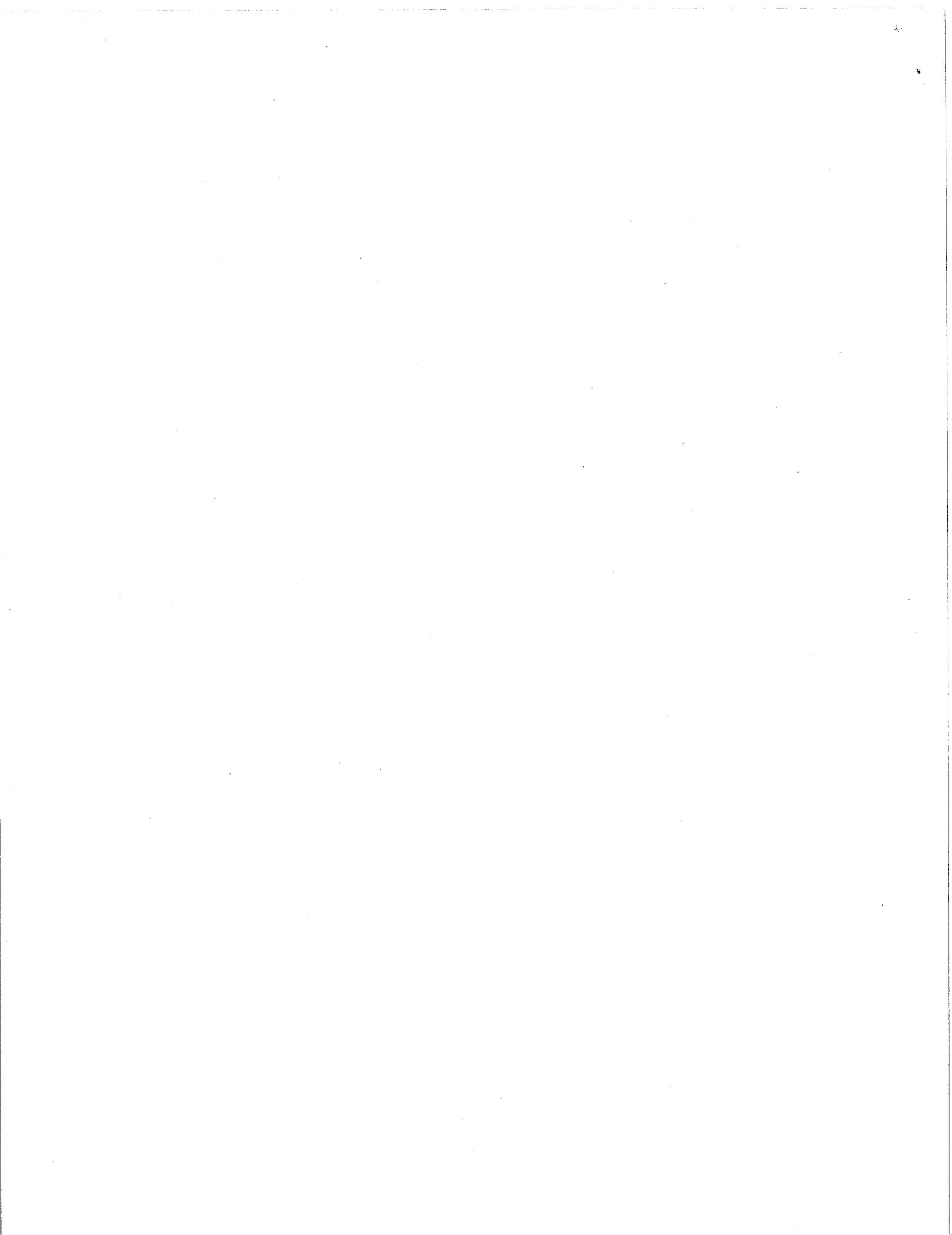
II. ALLEGATIONS

As owner and operator of the Plant, the Respondent is alleged to have:

1. Failed to maintain an emission rate below the maximum allowable emission limits from the POLYB Flare [emission point number ("EPN FL-351")], in violation of 30 TEX. ADMIN. CODE § 116.715(a), Permit No. 1176, Special Condition No. 1, and TEX. HEALTH & SAFETY CODE § 382.085(b), as documented during a record review conducted on April 2, 2008. Specifically, 5,088 pounds of volatile organic compounds were emitted on December 19, 2007 in a 6 hour, 2 minute period.
2. Failed to operate the POLYB Flare (EPN FL-351) during the emissions event of December 19, 2007 with a flame present at all times, in violation of 30 TEX. ADMIN. CODE § 116.715(a), Permit No. 1176, Special Condition No. 4B, 40 CODE OF FEDERAL REGULATIONS § 60.18(c)(2), and TEX. HEALTH & SAFETY CODE § 382.085(b), as documented during a record review conducted on April 2, 2008.

III. DENIALS

The Respondent generally denies each allegation in Section II ("Allegations").



IV. ORDERING PROVISIONS

1. It is, therefore, ordered by the TCEQ that the Respondent pay an administrative penalty as set forth in Section I, Paragraph 6 above. The payment of this administrative penalty and the Respondent's compliance with all the terms and conditions set forth in this Agreed Order resolve only the allegations in Section II. The Commission shall not be constrained in any manner from requiring corrective action or penalties for violations which are not raised here. Administrative penalty payments shall be made payable to "TCEQ" and shall be sent with the notation "Re: BP Amoco Chemical Company, Docket No. 2008-0628-AIR-E" to:

Financial Administration Division, Revenues Section
Attention: Cashier's Office, MC 214
Texas Commission on Environmental Quality
P.O. Box 13088
Austin, Texas 78711-3088

2. It is further ordered that the Respondent shall undertake the following technical requirements:
 - a. Immediately after the effective date of this Agreed Order, begin operating the POLYB Flare (EPN FL-351) with a flame present at all times, in accordance with Permit No. 1176, Special Condition No. 4B;
 - b. Within 30 days after the effective date of this Agreed Order, develop and begin implementing measures to improve design, operations, and/or maintenance practices to prevent the reoccurrence of emissions events similar to the emissions event that occurred on December 19, 2007; and
 - c. Within 45 days after the effective date of this Agreed Order, submit written certification as described below, and include detailed supporting documentation including photographs, receipts, and/or other records to demonstrate compliance with Ordering Provision Nos. 2.a. and 2.b. The certification shall be notarized by a State of Texas Notary Public and include the following certification language:

"I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations."

The certification shall be submitted to:

Order Compliance Team
Enforcement Division, MC 149A
Texas Commission on Environmental Quality
P.O. Box 13087
Austin, Texas 78711-3087

with a copy to:

Air Section Manager
Houston Regional Office
Texas Commission on Environmental Quality
5425 Polk Avenue, Suite H
Houston, Texas 77023-1486

3. The provisions of this Agreed Order shall apply to and be binding upon the Respondent. The Respondent is ordered to give notice of the Agreed Order to personnel who maintain day-to-day control over the Plant operations referenced in this Agreed Order.
4. If the Respondent fails to comply with any of the Ordering Provisions in this Agreed Order within the prescribed schedules, and that failure is caused solely by an act of God, war, strike, riot, or other catastrophe, the Respondent's failure to comply is not a violation of this Agreed Order. The Respondent shall have the burden of establishing to the Executive Director's satisfaction that such an event has occurred. The Respondent shall notify the Executive Director within seven days after the Respondent becomes aware of a delaying event and shall take all reasonable measures to mitigate and minimize any delay.
5. The Executive Director may grant an extension of any deadline in this Agreed Order or in any plan, report, or other document submitted pursuant to this Agreed Order, upon a written and substantiated showing of good cause. All requests for extensions by the Respondent shall be made in writing to the Executive Director. Extensions are not effective until the Respondent receives written approval from the Executive Director. The determination of what constitutes good cause rests solely with the Executive Director.
6. This Agreed Order, issued by the Commission, shall not be admissible against the Respondent in a civil proceeding, unless the proceeding is brought by the OAG to: (1) enforce the terms of this Agreed Order; or (2) pursue violations of a statute within the Commission's jurisdiction, or of a rule adopted or an order or permit issued by the Commission under such a statute.
7. This agreement may be executed in multiple counterparts, which together shall constitute a single original instrument. Any executed signature page to this Agreement may be transmitted by facsimile transmission to the other parties, which shall constitute an original signature for all purposes.
8. Under 30 TEX. ADMIN. CODE § 70.10(b), the effective date is the date of hand-delivery of the Order to the Respondent, or three days after the date on which the Commission mails notice of the Order to the Respondent, whichever is earlier. The Chief Clerk shall provide a copy of this Agreed Order to each of the parties.

BP Amoco Chemical Company
DOCKET NO. 2008-0628-AIR-E
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SIGNATURE PAGE

TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

For the Commission

John S. Sullivan
For the Executive Director

9/12/2008
Date

I, the undersigned, have read and understand the attached Agreed Order. I am authorized to agree to the terms and conditions specified therein. I further acknowledge that the TCEQ, in accepting payment for the penalty amount, is materially relying on such representation.

I also understand that failure to comply with the Ordering Provisions, if any, in this order and/or failure to timely pay the penalty amount, may result in:

- A negative impact on compliance history;
- Greater scrutiny of any permit applications submitted;
- Referral of this case to the Attorney General's Office for contempt, injunctive relief, additional penalties, and/or attorney fees, or to a collection agency;
- Increased penalties in any future enforcement actions;
- Automatic referral to the Attorney General's Office of any future enforcement actions; and
- TCEQ seeking other relief as authorized by law.

In addition, any falsification of any compliance documents may result in criminal prosecution.

[Signature]
Signature

June 9, 2008
Date

Susan Dio
Name (Printed or typed)
Authorized Representative of
BP Amoco Chemical Company

Plant Manager
Title TEXACO CITY CHEMICALS

Instructions: Send the original, signed Agreed Order with penalty payment to the Financial Administration Division, Revenues Section at the address in Section IV, Paragraph 1 of this Agreed Order.

