

EXECUTIVE SUMMARY - ENFORCEMENT MATTER Page 1 of 4
DOCKET NO.: 2008-1723-AIR-E **TCEQ ID:** RN100225945 **CASE NO.:** 36717
RESPONDENT NAME: The Dow Chemical Company

ORDER TYPE:		
<input type="checkbox"/> 1660 AGREED ORDER	<input checked="" 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: Dow Texas Operations Freeport, 2301 North Brazosport Boulevard, Freeport, Brazoria County</p> <p>TYPE OF OPERATION: Chemical manufacturing plant</p> <p>SMALL BUSINESS: <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p>OTHER SIGNIFICANT MATTERS: There are no complaints. There are two additional pending enforcement actions regarding this facility location, Docket Nos. 2008-0843-AIR-E and 2007-0923-AIR-E.</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 May 18, 2009. No comments were received.</p> <p>CONTACTS AND MAILING LIST: TCEQ Attorney/SEP Coordinator: Mr. Phillip Hampsten, SEP Coordinator, Enforcement Division, MC 219, (512) 239-6732 TCEQ Enforcement Coordinator: Ms. Nadia Hameed, Enforcement Division, Enforcement Team 5, MC R-12, (713) 767-3629; Ms. Cari-Michel La Caille, Enforcement Division, MC 219, (512) 239-1387 Respondent: Ms. Julie Woodard, Regulatory Affairs Manager, The Dow Chemical Company, 2301 North Brazosport Boulevard, Freeport, Texas 77541 Ms. Laura Ambrose, Responsible Care Leader, The Dow Chemical Company, 2301 North Brazosport Boulevard, Freeport, Texas 77541 Respondent's Attorney: Not represented by counsel on this enforcement matter</p>		

VIOLATION SUMMARY CHART:

VIOLATION INFORMATION	PENALTY CONSIDERATIONS	CORRECTIVE ACTIONS TAKEN/REQUIRED
<p>Type of Investigation: <input type="checkbox"/> Complaint <input checked="" type="checkbox"/> Routine <input type="checkbox"/> Enforcement Follow-up <input type="checkbox"/> Records Review</p> <p>Date(s) of Complaints Relating to this Case: None</p> <p>Date of Investigation Relating to this Case: December 17, 2007, July 16, September 22, August 20, and April 7, 2008</p> <p>Date of NOV/NOE Relating to this Case: August 28, August 30, November 2, November 9, and November 12, 2008 (NOE)</p> <p>Background Facts: These were routine investigations.</p> <p>AIR</p> <p>1) Failure to prevent unauthorized emissions and to operate a flare with a flame or pilot flame present. Specifically, 11,562 pounds ("lbs") of ethylene was released from an unlit flare, flare header safety valve, KO132 safety valve, light hydrocarbon recycle line safety valve and Train 1 vent valves when the Respondent failed to ensure that the two oil flow switches were working correctly prior to using Compressor A and B in the Polyethylene 4 Unit. A broken paddle in each of the two oil flow switches led to a sequence of events which extinguished both the flare and the flare pilots, resulting in an excessive emissions event which began on December 1, 2007, and lasted for three hours and 29 minutes (Incident No. 100717). Since the emissions event was avoidable by better operations practices, the demonstrations in 30 TEX. ADMIN. CODE § 101.222 necessary to present an affirmative defense were not met [30 TEX. ADMIN. CODE §§ 116.115(c), 101.20(1), and 101.221(a), Air Permit No. 834, Special Condition No. 1, 40 CODE OF FEDERAL REGULATIONS ("CFR") § 60.18(c), and TEX. HEALTH & SAFETY CODE § 382.085(b)].</p> <p>2) Failure to prevent unauthorized</p>	<p>Total Assessed: \$63,000</p> <p>Total Deferred: \$0 <input type="checkbox"/> Expedited Settlement <input type="checkbox"/> Financial Inability to Pay</p> <p>SEP Conditional Offset: \$31,500</p> <p>Total Paid to General Revenue: \$31,500</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>Findings Orders Justification: This case involves unauthorized emissions which have been deemed excessive.</p>	<p>Corrective Actions Taken:</p> <p>The Executive Director recognizes that the Respondent has implemented the following corrective measures at the Plant:</p> <p>a. On December 7, 2007, the valve supplying methane to the flare pilots was changed from an automated fail-closed valve to a manual valve to ensure that the valve is not affected by instrument air losses in the future (Incident No. 100717);</p> <p>b. On January 31, 2008, a daily inspection of the backup air supply system was added to the daily inspection sheet and low oil flow switches on the air compressors were added to a preventative maintenance schedule to be inspected annually and replaced as needed (Incident No. 100717);</p> <p>c. On September 3, 2008, the valve supplying steam to the flare was changed to a fail-close valve instead of fail-open to prevent excessive steam at the flare due to loss of instrument air (Incident No. 100717);</p> <p>d. On November 18, 2008, the corrective action plan ("CAP") was approved by the TCEQ, but all the corrective actions in the CAP had been completed on September 3, 2008 (Incident No. 100717);</p> <p>e. On June 28, 2008, the broken tubing connection on the control valve was replaced and bracing was added to reduce vibration until further analysis could be completed (Incident No. 110326);</p> <p>f. On August 4, 2008, metallurgical analysis was completed on the failed tubing to determine the cause of the failure. The root cause was found to be vibration and the over tightening of the tubing connection which accelerated the failure (Incident No. 110326);</p> <p>g. On August 18, 2008, the Light Hydrocarbon 7 Unit was surveyed for similar tubing connections and any potential vibration concerns (Incident No. 110326);</p>

emissions. Specifically, 1,064 lbs of ethylene, one lb of benzene, one lb of 1,3-butadiene, 770 lbs of carbon monoxide ("CO"), 107 lbs of nitrogen oxides ("NOx") and nine lbs of other chemicals were released when the Respondent failed to reduce high cycle bending fatigue caused by vibration and by over tightening the fitting on the tubing, leading to tubing failure in the Light Hydrocarbon 7 Unit, resulting in an emissions event which began on June 28, 2008, and lasted for two hours (Incident No. 110326). Since the emissions event was avoidable and could have been prevented by better operations practices, the demonstrations in 30 TEX. ADMIN. CODE § 101.222 necessary to present an affirmative defense were not met [30 TEX. ADMIN. CODE § 116.715(a), Air Permit No. 20432, Special Condition Chapter III-1, and TEX. HEALTH & SAFETY CODE § 382.085(b)].

3) Failure to prevent unauthorized emissions. Specifically, 1,244 lbs of ethylene were released when the Respondent failed to ascertain the condition of the bracing for a valve position indicator; vibration had caused the bracing bolts to become loose resulting in a valve position indicator failure of the Program 3 Valve on Train 1 of the Polyethylene 4 Reactor, resulting in an emissions event which began on August 2, 2008, and lasted for one minute (Incident No. 111947). Since the emissions event was avoidable by better operations practices, the demonstrations in 30 TEX. ADMIN. CODE § 101.222 necessary to present an affirmative defense were not met [30 TEX. ADMIN. CODE § 116.115(c), Air Permit No. 834, Special Condition No. 1, and TEX. HEALTH & SAFETY CODE § 382.085(b)].

4) Failure to prevent unauthorized emissions. Specifically, 757.9 lbs of ethylene oxide were released from the Wastewater Treatment Plant THROX, R-100 Reactor and R-110 Reactor, when the Respondent failed to close a valve on a washout line, resulting in an emissions event which began on July 8, 2008, and lasted for 101 hours (Incident No. 110793). Since the emissions event was avoidable by better operations practices, the demonstrations in 30 TEX. ADMIN. CODE § 101.222 necessary to present an affirmative defense were not met [30 TEX. ADMIN. CODE § 116.115(c), Air Permit No. 20909, Special Condition No. 1, and TEX. HEALTH & SAFETY CODE § 382.085(b)].

h. On August 22, 2008, training and procedures were developed and put in place for tubing installation (Incident No. 110326);

i. On December 23, 2008, the upgrade of air supply installations to valves was completed (Incident No. 110326);

j. On September 3, 2008, set up an electronic preventative maintenance schedule concerning the bracing of the control valve. The automated program will generate a work order to torque the bracing bolts associated with the reactor pressure control valve on annual frequency (Incident No. 111947);

k. On September 19, 2008, modified its "Shutdown and De-pressure Procedure" to include a step to inspect the reactor pressure control valve bracing for each shutdown where the reactor is depressurized completely (Incident No. 111947);

l. On September 9, 2008, an incoming ethylene oxide raw material balance alarm was added to the process control code (Incident No. 110793);

m. On September 25, 2008, the ethylene oxide pump clearing procedure was modified to provide more details on the operation of the valves around the pumps and to address the use of flex hoses (Incident No. 110793);

n. On September 27, 2008, the pump hard pipe connections that were connected to the wastewater treatment plant header were removed (Incident No. 110793); and

o. On January 6, 2009, the Respondent submitted the CAP to the TCEQ for Incident No. 104580. The CAP was approved on January 28, 2009, and corrective actions required by the CAP were also completed by that date.

Ordering Provisions:

The Order will require the Respondent to implement and complete a Supplemental Environmental Project (SEP). (See SEP Attachment A)

5) Failure to prevent unauthorized emissions. Specifically, 86 lbs of acetylene, 12,491 lbs of ethylene, 2,923 lbs of ethane, 12,226 lbs of propylene, 5,859 lbs of propane, 1,088 lbs of 1,3 butadiene, 91 lbs of cis 2-butene, 29,563 lbs of CO, 4,093 lbs of NOx, 81 lbs of isobutane, 235 lbs of n-butane, 352 lbs of trans 2-butene, 1,474 lbs of benzene, 2,337 lbs of toluene, 302 lbs of hexane, 452 lbs of isobutylene, 529 lbs of isopentane, 716 lbs of n-pentane and 331 lbs of 1-butene were released from Elevated Flare (F1) and Ground Flare (F1000) in the Light Hydrocarbon 8 Unit when the Respondent failed to prevent a system overload which led to the trip of two compressors during a start-up activity, resulting in an excessive emissions event which began on March 4, 2008, and lasted for 29 hours and 58 minutes (Incident No. 104580). Since the emissions event was avoidable by better operations practices, the demonstrations in 30 TEX. ADMIN. CODE § 101.222 necessary to present an affirmative defense were not met [30 TEX. ADMIN. CODE § 116.715(a), Air Permit No. 20432, Special Condition Chapter III-1, and TEX. HEALTH & SAFETY CODE § 382.085(b)].

Additional ID No(s): BL0082R

B. Environmental Benefit

This SEP will provide a discernible environmental benefit by reducing particulate emissions on buses by more than 90% below today's level and reducing hydrocarbons below measurement capability.

C. Minimum Expenditure

The Respondent shall contribute at least the SEP Amount to the Third-Party Recipient and comply with all other provisions of this SEP.

2. Performance Schedule

Within 30 days after the effective date of this Agreed Order, the Respondent must contribute the SEP Amount to the Third-Party Recipient. The Respondent shall mail the contribution, with a copy of the Agreed Order, to:

Houston-Galveston Area Council
Houston-Galveston AERCO
P.O. Box 22777
Houston, Texas 77227-2777

3. Records and Reporting

Concurrent with the payment of the SEP Amount, the Respondent shall provide the TCEQ SEP Coordinator with a copy of the check and transmittal letter indicating full payment of the SEP Amount to the Third-Party Recipient. The Respondent shall mail a copy of the check and transmittal letter to:

Enforcement Division
Attention: SEP Coordinator, MC 219
Texas Commission on Environmental Quality
P.O. Box 13087
Austin, Texas 78711-3087

4. Failure to Fully Perform

If the Respondent does not perform its obligations under this SEP in any way, including full payment of the SEP Amount and submittal of the required reporting described in Section 3 above, the Executive Director may require immediate payment of all or part of the SEP Amount.

The check for any amount due shall be made out to ATexas Commission on Environmental Quality@ and mailed to:

Litigation Division
Attention: SEP Coordinator, MC 175
Texas Commission on Environmental Quality
P.O. Box 13088
Austin, Texas 78711-3088

The Dow Chemical Company
Agreed Order B Attachment A

The Respondent shall also mail a copy of the check to the TCEQ SEP Coordinator at the address in Section 3 above.

5. Publicity

Any public statements concerning this SEP made by or on behalf of the Respondent must include a clear statement that the project was performed as part of the settlement of an enforcement action brought by the TCEQ. Such statements include advertising, public relations, and press releases.

6. Clean Texas Program

The Respondent shall not include this SEP in any application made to TCEQ under the "Clean Texas" (or any successor) program(s). Similarly, the Respondent may not seek recognition for this contribution in any other state or federal regulatory program.

7. Other SEPs by TCEQ or Other Agencies

The SEP identified in this Agreed Order has not been, and shall not be, included as an SEP for the Respondent under any other Agreed Order negotiated with the TCEQ or any other agency of the state or federal government.



Penalty Calculation Worksheet (PCW)

Policy Revision 2 (September 2002)

PCW Revision October 30, 2008

DATES	Assigned	18-Nov-2008	Screening	20-Nov-2008	EPA Due	7-Aug-2009
	PCW	22-Dec-2008				

RESPONDENT/FACILITY INFORMATION	
Respondent	The Dow Chemical Company
Reg. Ent. Ref. No.	RN100225945
Facility/Site Region	12-Houston
Major/Minor Source	Major

CASE INFORMATION			
Enf./Case ID No.	36717	No. of Violations	5
Docket No.	2008-1723-AIR-E	Order Type	Findings
Media Program(s)	Air	Government/Non-Profit	No
Multi-Media		Enf. Coordinator	Nadia Hameed
		EC's Team	Enforcement Team 5
Admin. Penalty \$ Limit Minimum	\$0	Maximum	\$10,000

Penalty Calculation Section

TOTAL BASE PENALTY (Sum of violation base penalties)	Subtotal 1	\$37,500
-------------------------------------------------------------	-------------------	----------

ADJUSTMENTS (+/-) TO SUBTOTAL 1		
Subtotals 2-7 are obtained by multiplying the Total Base Penalty (Subtotal 1) by the indicated percentage.		
Compliance History	445.0% Enhancement	Subtotals 2, 3, & 7 \$166,875

Notes
Penalty enhancement due to 58 Notices of Violations ("NOVs") issued for the same or similar violations; 40 NOVs issued for unrelated violations, six orders containing a denial of liability, and four orders without a denial of liability. Penalty reduction for 59 Notice of Audit letters and 43 Disclosures of Violation submitted.

Culpability	No	0.0% Enhancement	Subtotal 4	\$0
--------------------	----	------------------	-------------------	-----

Notes
The Respondent does not meet the culpability criteria.

Good Faith Effort to Comply Total Adjustments	Subtotal 5	\$2,500
------------------------------------------------------	-------------------	---------

Economic Benefit	0.0% Enhancement*	Subtotal 6	\$0
-------------------------	-------------------	-------------------	-----

Total EB Amounts \$1,549
Approx. Cost of Compliance \$44,100
*Capped at the Total EB \$ Amount

SUM OF SUBTOTALS 1-7	Final Subtotal	\$201,875
-----------------------------	-----------------------	-----------

OTHER FACTORS AS JUSTICE MAY REQUIRE	0.0%	Adjustment	\$0
---------------------------------------------	------	-------------------	-----

Reduces or enhances the Final Subtotal by the indicated percentage.

Notes

Final Penalty Amount	\$201,875
-----------------------------	-----------

STATUTORY LIMIT ADJUSTMENT	Final Assessed Penalty	\$63,000
-----------------------------------	-------------------------------	----------

DEFERRAL	0.0% Reduction	Adjustment	\$0
-----------------	----------------	-------------------	-----

Reduces the Final Assessed Penalty by the indicated percentage. (Enter number only; e.g. 20 for 20% reduction.)

Notes

No deferral is recommended for Findings Orders.

PAYABLE PENALTY	\$63,000
------------------------	----------

Screening Date 20-Nov-2008

Docket No. 2008-1723-AIR-E

PCW

Respondent The Dow Chemical Company

Policy Revision 2 (September 2002)

Case ID No. 36717

PCW Revision October 30, 2008

Reg. Ent. Reference No. RN100225945

Media [Statute] Air

Enf. Coordinator Nadia Hameed

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 (<i>number of NOVs meeting criteria</i>)	58	290%
	Other written NOVs	40	80%
Orders	Any agreed final enforcement orders containing a denial of liability (<i>number of orders meeting criteria</i>)	6	120%
	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	4	100%
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 (<i>number of judgements or consent decrees meeting criteria</i>)	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 (<i>number of counts</i>)	0	0%
Emissions	Chronic excessive emissions events (<i>number of events</i>)	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 (<i>number of audits for which notices were submitted</i>)	59	-59%
	Disclosures of violations under the Texas Environmental, Health, and Safety Audit Privilege Act, 74th Legislature, 1995 (<i>number of audits for which violations were disclosed</i>)	43	-86%

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) 445%

>> 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

Penalty enhancement due to 58 Notices of Violations ("NOVs") issued for the same or similar violations, 40 NOVs issued for unrelated violations, six orders containing a denial of liability, and four orders without a denial of liability. Penalty reduction for 59 Notice of Audit letters and 43 Disclosures of Violation submitted.

Total Adjustment Percentage (Subtotals 2, 3, & 7) 445%

Screening Date 20-Nov-2008	Docket No. 2008-1723-AIR-E	PCW		
Respondent The Dow Chemical Company	<small>Policy Revision 2 (September 2002)</small>			
Case ID No. 36717	<small>PCW Revision October 30, 2008</small>			
Reg. Ent. Reference No. RN100225945				
Media [Statute] Air				
Enf. Coordinator Nadia Hameed				
Violation Number	1			
Rule Cite(s)	30 Tex. Admin. Code §§ 116.115(c), 101.20(1), 101.221(a), Air Permit No. 834, Special Condition No. 1, 40 Code of Federal Regulations ("CFR") § 60.18(c), and Tex. Health & Safety Code § 382.085(b)			
Violation Description	Failed to prevent unauthorized emissions. Specifically, 11,562 pounds ("lbs") of ethylene was released from an unlit flare, flare header safety valve, KO132 safety valve, light hydrocarbon recycle line safety valve and Train 1 vent valves when the Respondent failed to ensure that the two oil flow switches were working correctly prior to using Compressor A and B in the Polyethylene 4 Unit. A broken paddle in each of the two oil flow switches led to a sequence of events which extinguished both the flare and the flare pilots, resulting in an excessive emissions event which began on December 1, 2007, and lasted for three hours and 29 minutes (Incident No. 100717). Since the emissions event was avoidable by better operations practices, the demonstrations in 30 Tex. Admin. Code § 101.222 necessary to present an affirmative defense were not met. The failure to operate with a flame or pilot flame at all times was also a violation of the state and federal standards.			
Base Penalty	\$10,000			
>> Environmental, Property and Human Health Matrix				
OR	Harm			
	Release	Major	Moderate	Minor
Actual	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Percent <input type="text" value="100%"/>
Potential	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
>> Programmatic Matrix				
Falsification			Percent	
Major Moderate Minor			<input type="text" value="0%"/>	
Matrix Notes	Human health or the environment has been exposed to significant amounts of pollutants a result of the violation.			
Adjustment			<input type="text" value="\$0"/>	
			\$10,000	
Violation Events				
Number of Violation Events <input type="text" value="1"/>		Number of violation days <input type="text" value="1"/>		
<small>mark only one with an x</small>	daily	<input checked="" type="checkbox"/>		
	weekly	<input type="checkbox"/>		
	monthly	<input type="checkbox"/>		
	quarterly	<input type="checkbox"/>		
	semiannual	<input type="checkbox"/>		
	annual	<input type="checkbox"/>		
	single event	<input type="checkbox"/>		
One daily event is recommended.			Violation Base Penalty <input type="text" value="\$10,000"/>	
Good Faith Efforts to Comply			\$1,000	
10.0% Reduction				
Before NOV NOV to EDPRP/Settlement Offer				
Extraordinary	<input type="checkbox"/>	<input type="checkbox"/>		
Ordinary	<input type="checkbox"/>	<input checked="" type="checkbox"/>		
N/A	<input type="checkbox"/>	<input type="checkbox"/>		
Notes	The Respondent completed the corrective actions on November 18, 2008.			
Violation Subtotal			\$9,000	
Economic Benefit (EB) for this violation			Statutory Limit Test	
Estimated EB Amount	<input type="text" value="\$515"/>	Violation Final Penalty Total	<input type="text" value="\$53,500"/>	
This violation Final Assessed Penalty (adjusted for limits)			\$10,000	

Economic Benefit Worksheet

Respondent The Dow Chemical Company
Case ID No. 36717
Reg. Ent. Reference No. RN100225945
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
No commas or \$							

Delayed Costs

Equipment	\$700	1-Dec-2007	7-Dec-2007	0.02	\$0	\$1	\$1
Buildings				0.00	\$0	\$0	\$0
Other (as needed)	\$800	1-Dec-2007	18-Nov-2008	0.97	\$3	\$52	\$54
Engineering/construction				0.00	\$0	\$0	\$0
Land				0.00	\$0	n/a	\$0
Record Keeping System				0.00	\$0	n/a	\$0
Training/Sampling	\$600	1-Dec-2007	31-Jan-2008	0.17	\$5	n/a	\$5
Remediation/Disposal				0.00	\$0	n/a	\$0
Permit Costs				0.00	\$0	n/a	\$0
Other (as needed)	\$12,000	1-Dec-2007	3-Sep-2008	0.76	\$455	n/a	\$455

Notes for DELAYED costs

Estimated cost for changing valves supplying methane to flare pilots (completed December 7, 2007), valve supplying steam to the flare replaced (September 3, 2008), instituting daily inspection of backup air supply system and low oil flow switches added to preventative maintenance schedule (completed January 31, 2008). The Corrective Action Plan ("CAP") was approved by TCEQ on November 18, 2008, but the corrective actions contained in the CAP were completed on September 3, 2008. Date required based on the date of the emissions event. Final date based on the date the CAP was approved.

Avoided Costs

ANNUALIZE [1] avoided costs before entering item (except for one-time avoided costs)

Disposal				0.00	\$0	\$0	\$0
Personnel				0.00	\$0	\$0	\$0
Inspection/Reporting/Sampling				0.00	\$0	\$0	\$0
Supplies/equipment				0.00	\$0	\$0	\$0
Financial Assurance [2]				0.00	\$0	\$0	\$0
ONE-TIME avoided costs [3]				0.00	\$0	\$0	\$0
Other (as needed)				0.00	\$0	\$0	\$0

Notes for AVOIDED costs

Approx. Cost of Compliance

\$14,100

TOTAL

\$515

Screening Date 20-Nov-2008	Docket No. 2008-1723-AIR-E	PCW
Respondent The Dow Chemical Company	<small>Policy Revision 2 (September 2002)</small>	
Case ID No. 36717	<small>PCW Revision October 30, 2008</small>	
Reg. Ent. Reference No. RN100225945		
Media [Statute] Air		
Enf. Coordinator Nadia Hameed		
Violation Number	2	
Rule Cite(s)	30 Tex. Admin. Code § 116.715(a), Air Permit No. 20432, Special Condition Chapter III-1 and Tex. Health & Safety Code § 382.085(b)	
Violation Description	Failed to prevent unauthorized emissions. Specifically, 1,064 lbs of ethylene, one lb of benzene, one lb of 1,3-butadiene, 770 lbs of carbon monoxide ("CO"), 107 lbs of nitrogen oxides ("NOx") and nine lbs of other chemicals were released when the Respondent failed to reduce high cycle bending fatigue caused by vibration and by over tightening the fitting on the tubing, leading to tubing failure in the Light Hydrocarbon 7 Unit, resulting in an emissions event which began on June 28, 2008, and lasted for two hours (Incident No. 110326). Since the emissions event was avoidable and could have been prevented by better operations practices, the demonstrations in 30 Tex. Admin. Code § 101.222 necessary to present an affirmative defense were not met.	
	Base Penalty	\$10,000

>> Environmental, Property and Human Health Matrix

OR	Harm					
		Major	Moderate	Minor		
	Actual			x		
	Potential				Percent	25%

>> Programmatic Matrix

	Falsification	Major	Moderate	Minor		Percent	0%
--	---------------	-------	----------	-------	--	----------------	----

Matrix Notes Human health or the environment has been exposed to insignificant amounts of pollutants which do not exceed levels that are protective of human health or environmental receptors as a result of the violation.

Adjustment \$7,500

\$2,500

Violation Events

Number of Violation Events Number of violation days

<small>mark only one with an x</small>	daily	
	weekly	
	monthly	x
	quarterly	
	semiannual	
	annual	
	single event	

Violation Base Penalty \$2,500

One monthly event is recommended.

Good Faith Efforts to Comply Reduction \$250

		Before NOV	NOV to EDPRP/Settlement Offer
	Extraordinary		
	Ordinary		x
	N/A		(mark with x)

Notes The Respondent completed the corrective actions on December 23, 2008.

Violation Subtotal \$2,250

Economic Benefit (EB) for this violation **Statutory Limit Test**

Estimated EB Amount **Violation Final Penalty Total** \$13,375

This violation Final Assessed Penalty (adjusted for limits) \$10,000

Economic Benefit Worksheet

Respondent The Dow Chemical Company
Case ID No. 36717
Reg. Ent. Reference No. RN100225945
Media Air
Violation No. 2

Percent Interest	Years of Depreciation
5.0	15

Item Description	Item Cost	Date Required	Final Date	Yrs	Interest Saved	Onetime Costs	EB Amount
------------------	-----------	---------------	------------	-----	----------------	---------------	-----------

No commas or \$

Delayed Costs

Equipment	\$500	28-Jun-2008	28-Jun-2008	0.00	\$0	\$0	\$0
Buildings				0.00	\$0	\$0	\$0
Other (as needed)	\$1,000	28-Jun-2008	4-Aug-2008	0.10	\$0	\$7	\$7
Engineering/construction	\$2,000	28-Jun-2008	18-Aug-2008	0.14	\$1	\$19	\$20
Land				0.00	\$0	n/a	\$0
Record Keeping System				0.00	\$0	n/a	\$0
Training/Sampling	\$500	28-Jun-2008	22-Aug-2008	0.15	\$4	n/a	\$4
Remediation/Disposal				0.00	\$0	n/a	\$0
Permit Costs				0.00	\$0	n/a	\$0
Other (as needed)	\$3,000	28-Jun-2008	23-Dec-2008	0.49	\$73	n/a	\$73

Notes for DELAYED costs

Estimated cost for replacing tubing connection (completed June 28, 2008), metallurgical analysis on failed tubing (completed August 4, 2008), survey of similar tubing connections (completed August 18, 2008) and tubing installation training (completed August 22, 2008). The upgrade of air supply installations to valves was completed on December 23, 2008. Date required based on the date of the emissions event. Final date based on the date the corrective actions were completed.

Avoided Costs

ANNUALIZE [1] avoided costs before entering item (except for one-time avoided costs)

Disposal				0.00	\$0	\$0	\$0
Personnel				0.00	\$0	\$0	\$0
Inspection/Reporting/Sampling				0.00	\$0	\$0	\$0
Supplies/equipment				0.00	\$0	\$0	\$0
Financial Assurance [2]				0.00	\$0	\$0	\$0
ONE-TIME avoided costs [3]				0.00	\$0	\$0	\$0
Other (as needed)				0.00	\$0	\$0	\$0

Notes for AVOIDED costs

Approx. Cost of Compliance

\$7,000

TOTAL

\$104

Screening Date 20-Nov-2008

Docket No. 2008-1723-AIR-E

PCW

Respondent The Dow Chemical Company

Policy Revision 2 (September 2002)

Case ID No. 36717

PCW Revision October 30, 2008

Reg. Ent. Reference No. RN100225945

Media [Statute] Air

Enf. Coordinator Nadia Hameed

Violation Number 3

Rule Cite(s) 30 Tex. Admin. Code § 116.115(c), Air Permit No. 834, Special Condition No. 1 and Tex. Health & Safety Code § 382.085(b)

Violation Description

Failed to prevent unauthorized emissions. Specifically, 1,244 lbs of ethylene were released when the Respondent failed to ascertain the condition of the bracing for a valve position indicator; vibration had caused the bracing bolts to become loose resulting in a valve position indicator failure of the Program 3 Valve on Train 1 of the Polyethylene 4 Reactor, resulting in an emissions event which began on August 2, 2008, and lasted for one minute (Incident No. 111947). Since the emissions event was avoidable by better operations practices, the demonstrations in 30 Tex. Admin. Code § 101.222 necessary to present an affirmative defense were not met.

Base Penalty \$10,000

>> Environmental, Property and Human Health Matrix

OR

Release	Harm		
	Major	Moderate	Minor
Actual			X
Potential			

Percent 25%

>> Programmatic Matrix

Falsification	Major	Moderate	Minor

Percent 0%

Matrix Notes

Human health or the environment has been exposed to insignificant amounts of pollutants which do not exceed levels that are protective of human health or environmental receptors as a result of the violation.

Adjustment \$7,500

\$2,500

Violation Events

Number of Violation Events 1

1 **Number of violation days**

mark only one with an x

daily	
weekly	
monthly	
quarterly	X
semiannual	
annual	
single event	

Violation Base Penalty \$2,500

One quarterly event is recommended.

Good Faith Efforts to Comply

25.0% Reduction

\$625

	Before NOV	NOV to EDPRP/Settlement Offer
Extraordinary		
Ordinary	X	
N/A		(mark with x)

Notes

The Respondent completed the corrective actions on September 19, 2008.

Violation Subtotal \$1,875

Economic Benefit (EB) for this violation

Statutory Limit Test

Estimated EB Amount \$14

Violation Final Penalty Total \$13,000

This violation Final Assessed Penalty (adjusted for limits) \$10,000

Economic Benefit Worksheet

Respondent The Dow Chemical Company
Case ID No. 36717
Reg. Ent. Reference No. RN100225945
Media Air
Violation No. 3

Percent Interest	Years of Depreciation
5.0	15

Item Description	Item Cost	Date Required	Final Date	Yrs	Interest Saved	Onetime Costs	EB Amount
------------------	-----------	---------------	------------	-----	----------------	---------------	-----------

No commas or \$

Delayed Costs

Equipment				0.00	\$0	\$0	\$0
Buildings				0.00	\$0	\$0	\$0
Other (as needed)	\$1,000	2-Aug-2008	19-Sep-2008	0.13	\$0	\$9	\$9
Engineering/construction				0.00	\$0	\$0	\$0
Land				0.00	\$0	n/a	\$0
Record Keeping System				0.00	\$0	n/a	\$0
Training/Sampling				0.00	\$0	n/a	\$0
Remediation/Disposal				0.00	\$0	n/a	\$0
Permit Costs				0.00	\$0	n/a	\$0
Other (as needed)	\$1,000	2-Aug-2008	3-Sep-2008	0.09	\$4	n/a	\$4

Notes for DELAYED costs
 Estimated cost for modifying the "Shutdown and De-pressure Procedure" to include inspection of the bracing (completed September 19, 2008), and set-up of an electronic preventative maintenance schedule for the bracing (completed September 3, 2008). Date required based on the date of the emissions event. Final date based on the date the corrective actions were completed.

Avoided Costs

ANNUALIZE [1] avoided costs before entering item (except for one-time avoided costs)

Disposal				0.00	\$0	\$0	\$0
Personnel				0.00	\$0	\$0	\$0
Inspection/Reporting/Sampling				0.00	\$0	\$0	\$0
Supplies/equipment				0.00	\$0	\$0	\$0
Financial Assurance [2]				0.00	\$0	\$0	\$0
ONE-TIME avoided costs [3]				0.00	\$0	\$0	\$0
Other (as needed)				0.00	\$0	\$0	\$0

Notes for AVOIDED costs

Approx. Cost of Compliance	\$2,000	TOTAL	\$14
-----------------------------------	---------	--------------	------

Screening Date 20-Nov-2008	Docket No. 2008-1723-AIR-E	PCW		
Respondent The Dow Chemical Company		<i>Policy Revision 2 (September 2002)</i>		
Case ID No. 36717		<i>PCW Revision October 30, 2008</i>		
Reg. Ent. Reference No. RN100225945				
Media [Statute] Air				
Enf. Coordinator Nadia Hameed				
Violation Number 4				
Rule Cite(s)	30 Tex. Admin. Code § 116.115(c), Air Permit No. 20909, Special Condition No. 1 and Tex. Health & Safety Code § 382.085(b)			
Violation Description	Failed to prevent unauthorized emissions. Specifically, 757.9 lbs of ethylene oxide were released from the Wastewater Treatment Plant THROX, R-100 Reactor and R-110 Reactor, when the Respondent failed to close a valve on a washout line, resulting in an emissions event which began on July 8, 2008, and lasted for 101 hours (Incident No. 110793). Since the emissions event was avoidable by better operations practices, the demonstrations in 30 Tex. Admin. Code § 101.222 necessary to present an affirmative defense were not met.			
	Base Penalty	\$10,000		
>> Environmental, Property and Human Health Matrix				
OR	Harm			
	Release	Major	Moderate	Minor
	Actual			x
	Potential			
			Percent	25%
>> Programmatic Matrix				
	Falsification	Major	Moderate	Minor
			Percent	0%
Matrix Notes	Human health or the environment has been exposed to insignificant amounts of pollutants which do not exceed levels that are protective of human health or environmental receptors as a result of the violation.			
	Adjustment	\$7,500		
				\$2,500
Violation Events				
	Number of Violation Events	1	Number of violation days	5
<i>mark only one with an x</i>	daily			
	weekly			
	monthly			
	quarterly	x		
	semiannual			
	annual			
	single event			
			Violation Base Penalty	\$2,500
	One quarterly event is recommended.			
Good Faith Efforts to Comply				
		25.0% Reduction		\$625
		Before NOV	NOV to EDPRP/Settlement Offer	
Extraordinary				
Ordinary	x			
N/A			(mark with x)	
Notes	The Respondent completed the corrective actions on September 27, 2008.			
			Violation Subtotal	\$1,875
Economic Benefit (EB) for this violation				
	Estimated EB Amount	\$13	Violation Final Penalty Total	\$13,000
			This violation Final Assessed Penalty (adjusted for limits)	\$13,000

Economic Benefit Worksheet

Respondent The Dow Chemical Company
Case ID No. 36717
Reg. Ent. Reference No. RN100225945
Media Air
Violation No. 4

Percent Interest	Years of Depreciation
5.0	15

Item Description	Item Cost	Date Required	Final Date	Yrs	Interest Saved	Onetime Costs	EB Amount
------------------	-----------	---------------	------------	-----	----------------	---------------	-----------

No commas or \$

Delayed Costs

Equipment	\$300	8-Jul-2008	27-Sep-2008	0.22	\$0	\$4	\$5
Buildings				0.00	\$0	\$0	\$0
Other (as needed)	\$400	8-Jul-2008	9-Sep-2008	0.17	\$0	\$5	\$5
Engineering/construction				0.00	\$0	\$0	\$0
Land				0.00	\$0	n/a	\$0
Record Keeping System				0.00	\$0	n/a	\$0
Training/Sampling				0.00	\$0	n/a	\$0
Remediation/Disposal				0.00	\$0	n/a	\$0
Permit Costs				0.00	\$0	n/a	\$0
Other (as needed)	\$300	8-Jul-2008	25-Sep-2008	0.22	\$3	n/a	\$3

Notes for DELAYED costs

Estimated cost of removing pump hard pipe connections to the wastewater system (completed September 27, 2008), adding an incoming ethylene oxide raw material balance to the process control code (completed September 9, 2008), and revising ethylene oxide pump clearing procedure (completed September 25, 2008). Date required based on the date of the emissions event. Final date based on the date the corrective actions were completed.

Avoided Costs

ANNUALIZE [1] avoided costs before entering item (except for one-time avoided costs)

Disposal				0.00	\$0	\$0	\$0
Personnel				0.00	\$0	\$0	\$0
Inspection/Reporting/Sampling				0.00	\$0	\$0	\$0
Supplies/equipment				0.00	\$0	\$0	\$0
Financial Assurance [2]				0.00	\$0	\$0	\$0
ONE-TIME avoided costs [3]				0.00	\$0	\$0	\$0
Other (as needed)				0.00	\$0	\$0	\$0

Notes for AVOIDED costs

Approx. Cost of Compliance

\$1,000

TOTAL

\$13

Screening Date 20-Nov-2008	Docket No. 2008-1723-AIR-E	PCW																			
Respondent The Dow Chemical Company		<i>Policy Revision 2 (September 2002)</i>																			
Case ID No. 36717		<i>PCW Revision October 30, 2008</i>																			
Reg. Ent. Reference No. RN100225945																					
Media [Statute] Air																					
Enf. Coordinator Nadia Hameed																					
Violation Number 5																					
Rule Cite(s) 30 Tex. Admin. Code § 116.715(a), Air Permit No. 20432, Special Condition Chapter III-1 and Tex. Health & Safety Code § 382.085(b)																					
Violation Description	Failed to prevent unauthorized emissions. Specifically, 86 lbs of acetylene, 12,491 lbs of ethylene, 2,923 lbs of ethane, 12,226 lbs of propylene, 5,859 lbs of propane, 1,088 lbs of 1,3 butadiene, 91 lbs of cis 2-butene, 29,563 lbs of CO, 4,093 lbs of NOx, 81 lbs of isobutane, 235 lbs of n-butane, 352 lbs of trans 2-butene, 1,474 lbs of benzene, 2,337 lbs of toluene, 302 lbs of hexane, 452 lbs of isobutylene, 529 lbs of isopentane, 716 lbs of n-pentane and 331 lbs of 1-butene were released from Elevated Flare (F1) and Ground Flare (F1000) in the Light Hydrocarbon 8 Unit when the Respondent failed to prevent a system overload which led to the trip of two compressors during a start-up activity, resulting in an excessive emissions event which began on March 4, 2008, and lasted for 29 hours and 58 minutes (Incident No. 104580). Since the emissions event was avoidable by better operations practices, the demonstrations in 30 Tex. Admin. Code § 101.222 necessary to present an affirmative defense were not met.																				
	Base Penalty	\$10,000																			
>> Environmental, Property and Human Health Matrix																					
OR	<table border="1" style="margin-left: auto; margin-right: auto;"> <tr> <td></td> <th colspan="3">Harm</th> <td></td> </tr> <tr> <td>Release</td> <td>Major</td> <td>Moderate</td> <td>Minor</td> <td></td> </tr> <tr> <td>Actual</td> <td style="text-align: center;">x</td> <td></td> <td></td> <td rowspan="2" style="text-align: right;">Percent 100%</td> </tr> <tr> <td>Potential</td> <td></td> <td></td> <td></td> </tr> </table>		Harm				Release	Major	Moderate	Minor		Actual	x			Percent 100%	Potential				
	Harm																				
Release	Major	Moderate	Minor																		
Actual	x			Percent 100%																	
Potential																					
>> Programmatic Matrix																					
	<table border="1" style="margin-left: auto; margin-right: auto;"> <tr> <td></td> <th>Falsification</th> <th>Major</th> <th>Moderate</th> <th>Minor</th> <td></td> </tr> <tr> <td>Matrix Notes</td> <td></td> <td></td> <td></td> <td></td> <td style="text-align: right;">Percent 0%</td> </tr> </table>		Falsification	Major	Moderate	Minor		Matrix Notes					Percent 0%								
	Falsification	Major	Moderate	Minor																	
Matrix Notes					Percent 0%																
	Human health or the environment has been exposed to significant amounts of pollutants as a result of the violation.																				
	Adjustment	\$0																			
Violation Events																					
	Number of Violation Events	2	Number of violation days																		
		2																			
mark only one with an x	<table border="1" style="margin-left: auto; margin-right: auto;"> <tr><td>daily</td><td style="text-align: center;">x</td></tr> <tr><td>weekly</td><td></td></tr> <tr><td>monthly</td><td></td></tr> <tr><td>quarterly</td><td></td></tr> <tr><td>semiannual</td><td></td></tr> <tr><td>annual</td><td></td></tr> <tr><td>single event</td><td></td></tr> </table>	daily	x	weekly		monthly		quarterly		semiannual		annual		single event		Violation Base Penalty	\$20,000				
daily	x																				
weekly																					
monthly																					
quarterly																					
semiannual																					
annual																					
single event																					
Two daily events are recommended.																					
Good Faith Efforts to Comply			0.0% Reduction																		
	<table border="1" style="margin-left: auto; margin-right: auto;"> <tr> <td></td> <th>Before NOV</th> <th>NOV to EDRP/Settlement Offer</th> </tr> <tr> <td>Extraordinary</td> <td></td> <td></td> </tr> <tr> <td>Ordinary</td> <td></td> <td></td> </tr> <tr> <td>N/A</td> <td style="text-align: center;">x</td> <td style="text-align: center;">(mark with x)</td> </tr> </table>		Before NOV	NOV to EDRP/Settlement Offer	Extraordinary			Ordinary			N/A	x	(mark with x)	Notes							
	Before NOV	NOV to EDRP/Settlement Offer																			
Extraordinary																					
Ordinary																					
N/A	x	(mark with x)																			
	Corrective actions were completed on January 28, 2009.																				
	Violation Subtotal	\$20,000																			
Economic Benefit (EB) for this violation			Statutory Limit Test																		
	Estimated EB Amount	\$904	Violation Final Penalty Total																		
			\$109,000																		
	This violation Final Assessed Penalty (adjusted for limits)		\$20,000																		

Economic Benefit Worksheet

Respondent The Dow Chemical Company
Case ID No. 36717
Reg. Ent. Reference No. RN100225945
Media Air
Violation No. 5

Percent Interest	Years of Depreciation
5.0	15

Item Description	Item Cost	Date Required	Final Date	Yrs	Interest Saved	Onetime Costs	EB Amount
------------------	-----------	---------------	------------	-----	----------------	---------------	-----------

No commas or \$

Delayed Costs

Equipment				0.00	\$0	\$0	\$0
Buildings				0.00	\$0	\$0	\$0
Other (as needed)				0.00	\$0	\$0	\$0
Engineering/construction				0.00	\$0	\$0	\$0
Land				0.00	\$0	n/a	\$0
Record Keeping System				0.00	\$0	n/a	\$0
Training/Sampling				0.00	\$0	n/a	\$0
Remediation/Disposal				0.00	\$0	n/a	\$0
Permit Costs				0.00	\$0	n/a	\$0
Other (as needed)	\$20,000	4-Mar-2008	28-Jan-2009	0.90	\$904	n/a	\$904

Notes for DELAYED costs

Estimated cost to prevent system overloads that cause tripping of compressors. Date required based on the date of the emissions event. Final date based on the date the corrective actions were completed.

Avoided Costs

ANNUALIZE [1] avoided costs before entering item (except for one-time avoided costs)

Disposal				0.00	\$0	\$0	\$0
Personnel				0.00	\$0	\$0	\$0
Inspection/Reporting/Sampling				0.00	\$0	\$0	\$0
Supplies/equipment				0.00	\$0	\$0	\$0
Financial Assurance [2]				0.00	\$0	\$0	\$0
ONE-TIME avoided costs [3]				0.00	\$0	\$0	\$0
Other (as needed)				0.00	\$0	\$0	\$0

Notes for AVOIDED costs

Approx. Cost of Compliance

\$20,000

TOTAL

\$904

Compliance History Report

Customer/Respondent/Owner-Operator: CN600356976 The Dow Chemical Company Classification: AVERAGE Rating: 2.51
Regulated Entity: RN100225945 DOW TEXAS OPERATIONS Classification: AVERAGE Site Rating: 2.93
FREEPORT

ID Number(s):	AIR OPERATING PERMITS	ACCOUNT NUMBER	BL0082R
	AIR OPERATING PERMITS	PERMIT	1388
	AIR OPERATING PERMITS	PERMIT	2202
	AIR OPERATING PERMITS	PERMIT	2203
	AIR OPERATING PERMITS	PERMIT	2204
	AIR OPERATING PERMITS	PERMIT	2205
	AIR OPERATING PERMITS	PERMIT	2206
	AIR OPERATING PERMITS	PERMIT	2207
	AIR OPERATING PERMITS	PERMIT	2208
	AIR OPERATING PERMITS	PERMIT	2209
	AIR OPERATING PERMITS	PERMIT	2210
	AIR OPERATING PERMITS	PERMIT	2211
	AIR OPERATING PERMITS	PERMIT	2212
	AIR OPERATING PERMITS	PERMIT	2213
	AIR OPERATING PERMITS	PERMIT	2214
	AIR OPERATING PERMITS	PERMIT	2215
	AIR OPERATING PERMITS	PERMIT	2216
	AIR OPERATING PERMITS	PERMIT	2217
	AIR OPERATING PERMITS	PERMIT	2218
	AIR OPERATING PERMITS	PERMIT	2219
	AIR OPERATING PERMITS	PERMIT	2220
	AIR OPERATING PERMITS	PERMIT	2221
	AIR OPERATING PERMITS	PERMIT	2311
	AIR OPERATING PERMITS	PERMIT	2313
	AIR OPERATING PERMITS	PERMIT	2697
	AIR OPERATING PERMITS	PERMIT	3005
	AIR OPERATING PERMITS	PERMIT	N041

AIR OPERATING PERMITS	PERMIT	3005
PUBLIC WATER SYSTEM/SUPPLY	REGISTRATION	0200535
PUBLIC WATER SYSTEM/SUPPLY	REGISTRATION	0200232
PUBLIC WATER SYSTEM/SUPPLY	REGISTRATION	0200027
WASTEWATER	PERMIT	WQ0000007000
WASTEWATER	PERMIT	TPDES0006483
WASTEWATER	PERMIT	TX0006483
WASTEWATER	PERMIT	TPDES0006484
WASTEWATER	PERMIT	TX0059447000
UNDERGROUND INJECTION CONTROL	PERMIT	WDW059
UNDERGROUND INJECTION CONTROL	PERMIT	WDW071
UNDERGROUND INJECTION CONTROL	PERMIT	WDW076
UNDERGROUND INJECTION CONTROL	PERMIT	WDW081
INDUSTRIAL AND HAZARDOUS WASTE GENERATION	EPA ID	TXD008092793
INDUSTRIAL AND HAZARDOUS WASTE GENERATION	SOLID WASTE REGISTRATION # (SWR)	30106
INDUSTRIAL AND HAZARDOUS WASTE STORAGE	PERMIT	50161
INDUSTRIAL AND HAZARDOUS WASTE STORAGE	PERMIT	50161
AIR NEW SOURCE PERMITS	PERMIT	941
AIR NEW SOURCE PERMITS	PERMIT	2417
AIR NEW SOURCE PERMITS	PERMIT	3941
AIR NEW SOURCE PERMITS	PERMIT	3947
AIR NEW SOURCE PERMITS	PERMIT	10770
AIR NEW SOURCE PERMITS	PERMIT	11275
AIR NEW SOURCE PERMITS	PERMIT	11832
AIR NEW SOURCE PERMITS	PERMIT	12173
AIR NEW SOURCE PERMITS	PERMIT	12755
AIR NEW SOURCE PERMITS	PERMIT	15718
AIR NEW SOURCE PERMITS	PERMIT	15988
AIR NEW SOURCE PERMITS	PERMIT	18211
AIR NEW SOURCE PERMITS	PERMIT	19041

AIR NEW SOURCE PERMITS	PERMIT	2602
AIR NEW SOURCE PERMITS	PERMIT	20195
AIR NEW SOURCE PERMITS	PERMIT	20228
AIR NEW SOURCE PERMITS	PERMIT	20285
AIR NEW SOURCE PERMITS	PERMIT	20432
AIR NEW SOURCE PERMITS	PERMIT	20525
AIR NEW SOURCE PERMITS	PERMIT	20607
AIR NEW SOURCE PERMITS	PERMIT	20687
AIR NEW SOURCE PERMITS	PERMIT	20774
AIR NEW SOURCE PERMITS	PERMIT	20775
AIR NEW SOURCE PERMITS	PERMIT	20776
AIR NEW SOURCE PERMITS	PERMIT	20777
AIR NEW SOURCE PERMITS	PERMIT	20909
AIR NEW SOURCE PERMITS	PERMIT	21676
AIR NEW SOURCE PERMITS	PERMIT	22077
AIR NEW SOURCE PERMITS	PERMIT	22063
AIR NEW SOURCE PERMITS	PERMIT	22070
AIR NEW SOURCE PERMITS	PERMIT	22071
AIR NEW SOURCE PERMITS	PERMIT	22072
AIR NEW SOURCE PERMITS	PERMIT	22078
AIR NEW SOURCE PERMITS	PERMIT	22085
AIR NEW SOURCE PERMITS	PERMIT	22743
AIR NEW SOURCE PERMITS	PERMIT	22759
AIR NEW SOURCE PERMITS	PERMIT	22853
AIR NEW SOURCE PERMITS	PERMIT	22809
AIR NEW SOURCE PERMITS	PERMIT	22810
AIR NEW SOURCE PERMITS	PERMIT	22851
AIR NEW SOURCE PERMITS	PERMIT	22862
AIR NEW SOURCE PERMITS	PERMIT	22945
AIR NEW SOURCE PERMITS	PERMIT	23075
AIR NEW SOURCE PERMITS	PERMIT	23076

AIR NEW SOURCE PERMITS	PERMIT	23519
AIR NEW SOURCE PERMITS	PERMIT	23387
AIR NEW SOURCE PERMITS	PERMIT	23388
AIR NEW SOURCE PERMITS	PERMIT	23389
AIR NEW SOURCE PERMITS	PERMIT	24053
AIR NEW SOURCE PERMITS	PERMIT	24101
AIR NEW SOURCE PERMITS	PERMIT	24030
AIR NEW SOURCE PERMITS	PERMIT	26692
AIR NEW SOURCE PERMITS	PERMIT	25702
AIR NEW SOURCE PERMITS	PERMIT	26035
AIR NEW SOURCE PERMITS	PERMIT	25124
AIR NEW SOURCE PERMITS	PERMIT	25536
AIR NEW SOURCE PERMITS	PERMIT	28363
AIR NEW SOURCE PERMITS	PERMIT	28220
AIR NEW SOURCE PERMITS	PERMIT	30018
AIR NEW SOURCE PERMITS	PERMIT	30622
AIR NEW SOURCE PERMITS	PERMIT	30503
AIR NEW SOURCE PERMITS	PERMIT	31753
AIR NEW SOURCE PERMITS	PERMIT	31992
AIR NEW SOURCE PERMITS	PERMIT	32546
AIR NEW SOURCE PERMITS	PERMIT	33212
AIR NEW SOURCE PERMITS	PERMIT	33328
AIR NEW SOURCE PERMITS	PERMIT	33609
AIR NEW SOURCE PERMITS	PERMIT	33593
AIR NEW SOURCE PERMITS	PERMIT	33885
AIR NEW SOURCE PERMITS	PERMIT	34111
AIR NEW SOURCE PERMITS	PERMIT	34116
AIR NEW SOURCE PERMITS	PERMIT	34368
AIR NEW SOURCE PERMITS	PERMIT	34545
AIR NEW SOURCE PERMITS	PERMIT	34541
AIR NEW SOURCE PERMITS	PERMIT	35022
AIR NEW SOURCE PERMITS	PERMIT	35012

AIR NEW SOURCE PERMITS	PERMIT	35204
AIR NEW SOURCE PERMITS	PERMIT	35203
AIR NEW SOURCE PERMITS	PERMIT	35364
AIR NEW SOURCE PERMITS	PERMIT	35413
AIR NEW SOURCE PERMITS	PERMIT	35658
AIR NEW SOURCE PERMITS	PERMIT	36002
AIR NEW SOURCE PERMITS	PERMIT	36397
AIR NEW SOURCE PERMITS	PERMIT	25205
AIR NEW SOURCE PERMITS	PERMIT	36554
AIR NEW SOURCE PERMITS	PERMIT	36523
AIR NEW SOURCE PERMITS	PERMIT	36569
AIR NEW SOURCE PERMITS	PERMIT	36634
AIR NEW SOURCE PERMITS	PERMIT	37000
AIR NEW SOURCE PERMITS	PERMIT	37122
AIR NEW SOURCE PERMITS	PERMIT	37569
AIR NEW SOURCE PERMITS	PERMIT	37884
AIR NEW SOURCE PERMITS	PERMIT	37667
AIR NEW SOURCE PERMITS	REGISTRATION	71888
AIR NEW SOURCE PERMITS	PERMIT	4020
AIR NEW SOURCE PERMITS	PERMIT	4021
AIR NEW SOURCE PERMITS	PERMIT	4031
AIR NEW SOURCE PERMITS	PERMIT	4085
AIR NEW SOURCE PERMITS	PERMIT	4310A
AIR NEW SOURCE PERMITS	PERMIT	5339
AIR NEW SOURCE PERMITS	PERMIT	5520
AIR NEW SOURCE PERMITS	PERMIT	5661
AIR NEW SOURCE PERMITS	PERMIT	6743
AIR NEW SOURCE PERMITS	PERMIT	6803
AIR NEW SOURCE PERMITS	PERMIT	7131
AIR NEW SOURCE PERMITS	PERMIT	7341
AIR NEW SOURCE PERMITS	PERMIT	7386
AIR NEW SOURCE PERMITS	PERMIT	7387

AIR NEW SOURCE PERMITS	PERMIT	7423
AIR NEW SOURCE PERMITS	PERMIT	7531
AIR NEW SOURCE PERMITS	PERMIT	7593
AIR NEW SOURCE PERMITS	PERMIT	8009
AIR NEW SOURCE PERMITS	PERMIT	8047
AIR NEW SOURCE PERMITS	PERMIT	8567
AIR NEW SOURCE PERMITS	PERMIT	9044
AIR NEW SOURCE PERMITS	PERMIT	9046
AIR NEW SOURCE PERMITS	PERMIT	9047
AIR NEW SOURCE PERMITS	PERMIT	9822
AIR NEW SOURCE PERMITS	PERMIT	10423
AIR NEW SOURCE PERMITS	PERMIT	10690
AIR NEW SOURCE PERMITS	PERMIT	10790
AIR NEW SOURCE PERMITS	PERMIT	10791
AIR NEW SOURCE PERMITS	PERMIT	10959
AIR NEW SOURCE PERMITS	PERMIT	11076
AIR NEW SOURCE PERMITS	PERMIT	11566
AIR NEW SOURCE PERMITS	PERMIT	11567
AIR NEW SOURCE PERMITS	PERMIT	11644
AIR NEW SOURCE PERMITS	PERMIT	12128
AIR NEW SOURCE PERMITS	PERMIT	12130
AIR NEW SOURCE PERMITS	PERMIT	12145
AIR NEW SOURCE PERMITS	PERMIT	12166
AIR NEW SOURCE PERMITS	PERMIT	12432
AIR NEW SOURCE PERMITS	PERMIT	12445
AIR NEW SOURCE PERMITS	PERMIT	12484
AIR NEW SOURCE PERMITS	PERMIT	12520
AIR NEW SOURCE PERMITS	PERMIT	13194
AIR NEW SOURCE PERMITS	PERMIT	13873
AIR NEW SOURCE PERMITS	PERMIT	15811
AIR NEW SOURCE PERMITS	PERMIT	16249

AIR NEW SOURCE PERMITS	PERMIT	16473
AIR NEW SOURCE PERMITS	PERMIT	7009
AIR NEW SOURCE PERMITS	PERMIT	13920
AIR NEW SOURCE PERMITS	PERMIT	14329
AIR NEW SOURCE PERMITS	PERMIT	17027
AIR NEW SOURCE PERMITS	PERMIT	17028
AIR NEW SOURCE PERMITS	PERMIT	17107
AIR NEW SOURCE PERMITS	PERMIT	17374
AIR NEW SOURCE PERMITS	PERMIT	20996
AIR NEW SOURCE PERMITS	PERMIT	20997
AIR NEW SOURCE PERMITS	PERMIT	18258
AIR NEW SOURCE PERMITS	PERMIT	18561
AIR NEW SOURCE PERMITS	PERMIT	18624
AIR NEW SOURCE PERMITS	PERMIT	18950
AIR NEW SOURCE PERMITS	PERMIT	19026
AIR NEW SOURCE PERMITS	PERMIT	19050
AIR NEW SOURCE PERMITS	PERMIT	19519
AIR NEW SOURCE PERMITS	PERMIT	37618
AIR NEW SOURCE PERMITS	PERMIT	38157
AIR NEW SOURCE PERMITS	PERMIT	38156
AIR NEW SOURCE PERMITS	PERMIT	38861
AIR NEW SOURCE PERMITS	PERMIT	38759
AIR NEW SOURCE PERMITS	PERMIT	39609
AIR NEW SOURCE PERMITS	PERMIT	39450
AIR NEW SOURCE PERMITS	PERMIT	40479
AIR NEW SOURCE PERMITS	PERMIT	40430
AIR NEW SOURCE PERMITS	PERMIT	40854
AIR NEW SOURCE PERMITS	PERMIT	41163
AIR NEW SOURCE PERMITS	PERMIT	41108
AIR NEW SOURCE PERMITS	PERMIT	41179
AIR NEW SOURCE PERMITS	PERMIT	41304
AIR NEW SOURCE PERMITS	PERMIT	41302

AIR NEW SOURCE PERMITS	PERMIT	41542
AIR NEW SOURCE PERMITS	PERMIT	41555
AIR NEW SOURCE PERMITS	PERMIT	42190
AIR NEW SOURCE PERMITS	PERMIT	42611
AIR NEW SOURCE PERMITS	PERMIT	42464
AIR NEW SOURCE PERMITS	PERMIT	42384
AIR NEW SOURCE PERMITS	PERMIT	42923
AIR NEW SOURCE PERMITS	PERMIT	43382
AIR NEW SOURCE PERMITS	PERMIT	43381
AIR NEW SOURCE PERMITS	PERMIT	43417
AIR NEW SOURCE PERMITS	PERMIT	43416
AIR NEW SOURCE PERMITS	PERMIT	42443
AIR NEW SOURCE PERMITS	PERMIT	43813
AIR NEW SOURCE PERMITS	PERMIT	43859
AIR NEW SOURCE PERMITS	PERMIT	43959
AIR NEW SOURCE PERMITS	PERMIT	43960
AIR NEW SOURCE PERMITS	PERMIT	44002
AIR NEW SOURCE PERMITS	PERMIT	44001
AIR NEW SOURCE PERMITS	PERMIT	44036
AIR NEW SOURCE PERMITS	PERMIT	44056
AIR NEW SOURCE PERMITS	PERMIT	44118
AIR NEW SOURCE PERMITS	PERMIT	44411
AIR NEW SOURCE PERMITS	PERMIT	44464
AIR NEW SOURCE PERMITS	PERMIT	44465
AIR NEW SOURCE PERMITS	PERMIT	44608
AIR NEW SOURCE PERMITS	PERMIT	44622
AIR NEW SOURCE PERMITS	PERMIT	44718
AIR NEW SOURCE PERMITS	PERMIT	44719
AIR NEW SOURCE PERMITS	PERMIT	44833
AIR NEW SOURCE PERMITS	PERMIT	44834
AIR NEW SOURCE PERMITS	PERMIT	45097
AIR NEW SOURCE PERMITS	PERMIT	45152

AIR NEW SOURCE PERMITS	PERMIT	45449
AIR NEW SOURCE PERMITS	PERMIT	46009
AIR NEW SOURCE PERMITS	PERMIT	46174
AIR NEW SOURCE PERMITS	PERMIT	46173
AIR NEW SOURCE PERMITS	PERMIT	46306
AIR NEW SOURCE PERMITS	PERMIT	46378
AIR NEW SOURCE PERMITS	PERMIT	46429
AIR NEW SOURCE PERMITS	PERMIT	46428
AIR NEW SOURCE PERMITS	PERMIT	46431
AIR NEW SOURCE PERMITS	PERMIT	46481
AIR NEW SOURCE PERMITS	PERMIT	46568
AIR NEW SOURCE PERMITS	PERMIT	46658
AIR NEW SOURCE PERMITS	PERMIT	46682
AIR NEW SOURCE PERMITS	PERMIT	46767
AIR NEW SOURCE PERMITS	PERMIT	46798
AIR NEW SOURCE PERMITS	PERMIT	46911
AIR NEW SOURCE PERMITS	PERMIT	46987
AIR NEW SOURCE PERMITS	PERMIT	47095
AIR NEW SOURCE PERMITS	PERMIT	47092
AIR NEW SOURCE PERMITS	PERMIT	47203
AIR NEW SOURCE PERMITS	PERMIT	47114
AIR NEW SOURCE PERMITS	PERMIT	47374
AIR NEW SOURCE PERMITS	PERMIT	47347
AIR NEW SOURCE PERMITS	PERMIT	47352
AIR NEW SOURCE PERMITS	PERMIT	47564
AIR NEW SOURCE PERMITS	PERMIT	47970
AIR NEW SOURCE PERMITS	PERMIT	48027
AIR NEW SOURCE PERMITS	PERMIT	48343
AIR NEW SOURCE PERMITS	PERMIT	48337
AIR NEW SOURCE PERMITS	PERMIT	48414
AIR NEW SOURCE PERMITS	PERMIT	48567

AIR NEW SOURCE PERMITS	PERMIT	48715
AIR NEW SOURCE PERMITS	PERMIT	48478
AIR NEW SOURCE PERMITS	PERMIT	48479
AIR NEW SOURCE PERMITS	PERMIT	48813
AIR NEW SOURCE PERMITS	PERMIT	49187
AIR NEW SOURCE PERMITS	PERMIT	49235
AIR NEW SOURCE PERMITS	PERMIT	49253
AIR NEW SOURCE PERMITS	PERMIT	47314
AIR NEW SOURCE PERMITS	PERMIT	49685
AIR NEW SOURCE PERMITS	PERMIT	37957
AIR NEW SOURCE PERMITS	PERMIT	9871
AIR NEW SOURCE PERMITS	PERMIT	9938
AIR NEW SOURCE PERMITS	PERMIT	9973
AIR NEW SOURCE PERMITS	PERMIT	3301
AIR NEW SOURCE PERMITS	PERMIT	3320
AIR NEW SOURCE PERMITS	PERMIT	834
AIR NEW SOURCE PERMITS	PERMIT	13682
AIR NEW SOURCE PERMITS	PERMIT	313
AIR NEW SOURCE PERMITS	PERMIT	646
AIR NEW SOURCE PERMITS	PERMIT	1407
AIR NEW SOURCE PERMITS	PERMIT	1430
AIR NEW SOURCE PERMITS	PERMIT	1496
AIR NEW SOURCE PERMITS	PERMIT	1496B
AIR NEW SOURCE PERMITS	PERMIT	1496C
AIR NEW SOURCE PERMITS	PERMIT	2008
AIR NEW SOURCE PERMITS	PERMIT	2804
AIR NEW SOURCE PERMITS	PERMIT	49715
AIR NEW SOURCE PERMITS	PERMIT	85494
AIR NEW SOURCE PERMITS	PERMIT	49965
AIR NEW SOURCE PERMITS	PERMIT	50298
AIR NEW SOURCE PERMITS	REGISTRATION	72132
AIR NEW SOURCE PERMITS	PERMIT	5340

AIR NEW SOURCE PERMITS	PERMIT	5746
AIR NEW SOURCE PERMITS	PERMIT	6069A
AIR NEW SOURCE PERMITS	PERMIT	6383
AIR NEW SOURCE PERMITS	PERMIT	6744
AIR NEW SOURCE PERMITS	PERMIT	6932
AIR NEW SOURCE PERMITS	PERMIT	7093
AIR NEW SOURCE PERMITS	PERMIT	7094
AIR NEW SOURCE PERMITS	PERMIT	7385
AIR NEW SOURCE PERMITS	PERMIT	7447
AIR NEW SOURCE PERMITS	PERMIT	7942
AIR NEW SOURCE PERMITS	PERMIT	9045
AIR NEW SOURCE PERMITS	PERMIT	9837
AIR NEW SOURCE PERMITS	PERMIT	9838
AIR NEW SOURCE PERMITS	PERMIT	10469
AIR NEW SOURCE PERMITS	PERMIT	10534
AIR NEW SOURCE PERMITS	PERMIT	10613
AIR NEW SOURCE PERMITS	PERMIT	10674
AIR NEW SOURCE PERMITS	PERMIT	10677
AIR NEW SOURCE PERMITS	PERMIT	10689
AIR NEW SOURCE PERMITS	PERMIT	10731
AIR NEW SOURCE PERMITS	PERMIT	10766
AIR NEW SOURCE PERMITS	PERMIT	10792
AIR NEW SOURCE PERMITS	PERMIT	10794
AIR NEW SOURCE PERMITS	PERMIT	10845
AIR NEW SOURCE PERMITS	PERMIT	10955
AIR NEW SOURCE PERMITS	PERMIT	11092
AIR NEW SOURCE PERMITS	PERMIT	11691
AIR NEW SOURCE PERMITS	PERMIT	11691A
AIR NEW SOURCE PERMITS	PERMIT	11745
AIR NEW SOURCE PERMITS	PERMIT	11919
AIR NEW SOURCE PERMITS	PERMIT	12007

AIR NEW SOURCE PERMITS	PERMIT	12008
AIR NEW SOURCE PERMITS	PERMIT	12045
AIR NEW SOURCE PERMITS	PERMIT	12051
AIR NEW SOURCE PERMITS	PERMIT	12104
AIR NEW SOURCE PERMITS	PERMIT	12265
AIR NEW SOURCE PERMITS	PERMIT	12613
AIR NEW SOURCE PERMITS	PERMIT	13104
AIR NEW SOURCE PERMITS	PERMIT	13132
AIR NEW SOURCE PERMITS	PERMIT	13950
AIR NEW SOURCE PERMITS	PERMIT	14935
AIR NEW SOURCE PERMITS	PERMIT	15386
AIR NEW SOURCE PERMITS	PERMIT	4022
AIR NEW SOURCE PERMITS	PERMIT	12340
AIR NEW SOURCE PERMITS	PERMIT	6911
AIR NEW SOURCE PERMITS	PERMIT	18145
AIR NEW SOURCE PERMITS	PERMIT	19202
AIR NEW SOURCE PERMITS	PERMIT	19243
AIR NEW SOURCE PERMITS	PERMIT	19715
AIR NEW SOURCE PERMITS	PERMIT	19720
AIR NEW SOURCE PERMITS	PERMIT	19792
AIR NEW SOURCE PERMITS	PERMIT	20495
AIR NEW SOURCE PERMITS	PERMIT	21596
AIR NEW SOURCE PERMITS	PERMIT	30002
AIR NEW SOURCE PERMITS	PERMIT	119
AIR NEW SOURCE PERMITS	PERMIT	120
AIR NEW SOURCE PERMITS	PERMIT	770
AIR NEW SOURCE PERMITS	PERMIT	1258
AIR NEW SOURCE PERMITS	PERMIT	1472
AIR NEW SOURCE PERMITS	PERMIT	1558
AIR NEW SOURCE PERMITS	PERMIT	1559
AIR NEW SOURCE PERMITS	PERMIT	1655

AIR NEW SOURCE PERMITS	PERMIT	1658
AIR NEW SOURCE PERMITS	PERMIT	1715
AIR NEW SOURCE PERMITS	PERMIT	2008A
AIR NEW SOURCE PERMITS	PERMIT	2367
AIR NEW SOURCE PERMITS	PERMIT	2606
AIR NEW SOURCE PERMITS	PERMIT	2728
AIR NEW SOURCE PERMITS	PERMIT	2772
AIR NEW SOURCE PERMITS	PERMIT	3302
AIR NEW SOURCE PERMITS	PERMIT	3347
AIR NEW SOURCE PERMITS	PERMIT	3914
AIR NEW SOURCE PERMITS	PERMIT	52152
AIR NEW SOURCE PERMITS	PERMIT	52724
AIR NEW SOURCE PERMITS	PERMIT	52200
AIR NEW SOURCE PERMITS	PERMIT	52999
AIR NEW SOURCE PERMITS	PERMIT	52998
AIR NEW SOURCE PERMITS	PERMIT	53895
AIR NEW SOURCE PERMITS	PERMIT	54200
AIR NEW SOURCE PERMITS	REGISTRATION	55032
AIR NEW SOURCE PERMITS	REGISTRATION	55411
AIR NEW SOURCE PERMITS	PERMIT	83795
AIR NEW SOURCE PERMITS	PERMIT	83838
AIR NEW SOURCE PERMITS	REGISTRATION	55537
AIR NEW SOURCE PERMITS	REGISTRATION	75817
AIR NEW SOURCE PERMITS	REGISTRATION	76012
AIR NEW SOURCE PERMITS	REGISTRATION	75579
AIR NEW SOURCE PERMITS	PERMIT	75751
AIR NEW SOURCE PERMITS	REGISTRATION	76295
AIR NEW SOURCE PERMITS	REGISTRATION	76138
AIR NEW SOURCE PERMITS	REGISTRATION	76039
AIR NEW SOURCE PERMITS	REGISTRATION	75513
AIR NEW SOURCE PERMITS	REGISTRATION	56833
AIR NEW SOURCE PERMITS	REGISTRATION	56851

AIR NEW SOURCE PERMITS	REGISTRATION	70194
AIR NEW SOURCE PERMITS	REGISTRATION	70195
AIR NEW SOURCE PERMITS	PERMIT	48892
AIR NEW SOURCE PERMITS	REGISTRATION	70458
AIR NEW SOURCE PERMITS	PERMIT	70940
AIR NEW SOURCE PERMITS	REGISTRATION	70945
AIR NEW SOURCE PERMITS	REGISTRATION	70776
AIR NEW SOURCE PERMITS	PERMIT	71039
AIR NEW SOURCE PERMITS	PERMIT	71062
AIR NEW SOURCE PERMITS	ACCOUNT NUMBER	BL0082R
AIR NEW SOURCE PERMITS	REGISTRATION	70592
AIR NEW SOURCE PERMITS	PERMIT	71209
AIR NEW SOURCE PERMITS	PERMIT	N59
AIR NEW SOURCE PERMITS	REGISTRATION	105095
AIR NEW SOURCE PERMITS	REGISTRATION	71584
AIR NEW SOURCE PERMITS	REGISTRATION	71087
AIR NEW SOURCE PERMITS	REGISTRATION	71088
AIR NEW SOURCE PERMITS	REGISTRATION	71089
AIR NEW SOURCE PERMITS	REGISTRATION	71090
AIR NEW SOURCE PERMITS	REGISTRATION	71091
AIR NEW SOURCE PERMITS	PERMIT	54140
AIR NEW SOURCE PERMITS	PERMIT	53905
AIR NEW SOURCE PERMITS	PERMIT	50646
AIR NEW SOURCE PERMITS	PERMIT	52153
AIR NEW SOURCE PERMITS	PERMIT	52179
AIR NEW SOURCE PERMITS	PERMIT	53903
AIR NEW SOURCE PERMITS	PERMIT	52201
AIR NEW SOURCE PERMITS	PERMIT	53954
AIR NEW SOURCE PERMITS	PERMIT	50488
AIR NEW SOURCE PERMITS	REGISTRATION	71781
AIR NEW SOURCE PERMITS	PERMIT	52884
AIR NEW SOURCE PERMITS	PERMIT	53897

AIR NEW SOURCE PERMITS	PERMIT	54042
AIR NEW SOURCE PERMITS	PERMIT	71936
AIR NEW SOURCE PERMITS	PERMIT	50576
AIR NEW SOURCE PERMITS	REGISTRATION	72671
AIR NEW SOURCE PERMITS	PERMIT	53736
AIR NEW SOURCE PERMITS	PERMIT	53814
AIR NEW SOURCE PERMITS	REGISTRATION	72663
AIR NEW SOURCE PERMITS	REGISTRATION	72884
AIR NEW SOURCE PERMITS	REGISTRATION	72794
AIR NEW SOURCE PERMITS	REGISTRATION	72798
AIR NEW SOURCE PERMITS	PERMIT	3434
AIR NEW SOURCE PERMITS	PERMIT	53811
AIR NEW SOURCE PERMITS	PERMIT	52180
AIR NEW SOURCE PERMITS	REGISTRATION	74059
AIR NEW SOURCE PERMITS	PERMIT	74209
AIR NEW SOURCE PERMITS	PERMIT	73732
AIR NEW SOURCE PERMITS	PERMIT	73750
AIR NEW SOURCE PERMITS	REGISTRATION	73781
AIR NEW SOURCE PERMITS	REGISTRATION	74543
AIR NEW SOURCE PERMITS	REGISTRATION	74748
AIR NEW SOURCE PERMITS	REGISTRATION	74597
AIR NEW SOURCE PERMITS	PERMIT	75090
AIR NEW SOURCE PERMITS	REGISTRATION	74350
AIR NEW SOURCE PERMITS	REGISTRATION	74940
AIR NEW SOURCE PERMITS	REGISTRATION	75239
AIR NEW SOURCE PERMITS	REGISTRATION	74853
AIR NEW SOURCE PERMITS	REGISTRATION	76448
AIR NEW SOURCE PERMITS	PERMIT	76453
AIR NEW SOURCE PERMITS	EPA ID	PSDTX993
AIR NEW SOURCE PERMITS	EPA ID	PSDTX994
AIR NEW SOURCE PERMITS	EPA ID	PSDTX994M1

AIR NEW SOURCE PERMITS	EPA ID	PSDTX986M1
AIR NEW SOURCE PERMITS	REGISTRATION	76506
AIR NEW SOURCE PERMITS	REGISTRATION	76504
AIR NEW SOURCE PERMITS	PERMIT	76763
AIR NEW SOURCE PERMITS	REGISTRATION	76536
AIR NEW SOURCE PERMITS	REGISTRATION	77669
AIR NEW SOURCE PERMITS	REGISTRATION	77405
AIR NEW SOURCE PERMITS	REGISTRATION	77287
AIR NEW SOURCE PERMITS	REGISTRATION	76873
AIR NEW SOURCE PERMITS	REGISTRATION	77765
AIR NEW SOURCE PERMITS	REGISTRATION	77211
AIR NEW SOURCE PERMITS	REGISTRATION	77426
AIR NEW SOURCE PERMITS	REGISTRATION	77143
AIR NEW SOURCE PERMITS	REGISTRATION	77339
AIR NEW SOURCE PERMITS	REGISTRATION	77522
AIR NEW SOURCE PERMITS	REGISTRATION	77521
AIR NEW SOURCE PERMITS	REGISTRATION	76863
AIR NEW SOURCE PERMITS	REGISTRATION	77171
AIR NEW SOURCE PERMITS	REGISTRATION	77190
AIR NEW SOURCE PERMITS	AFS NUM	4803900041
AIR NEW SOURCE PERMITS	REGISTRATION	78008
AIR NEW SOURCE PERMITS	REGISTRATION	78255
AIR NEW SOURCE PERMITS	REGISTRATION	78257
AIR NEW SOURCE PERMITS	REGISTRATION	78626
AIR NEW SOURCE PERMITS	REGISTRATION	78248
AIR NEW SOURCE PERMITS	REGISTRATION	78285
AIR NEW SOURCE PERMITS	REGISTRATION	78286
AIR NEW SOURCE PERMITS	REGISTRATION	78471
AIR NEW SOURCE PERMITS	REGISTRATION	78482
AIR NEW SOURCE PERMITS	REGISTRATION	78570
AIR NEW SOURCE PERMITS	REGISTRATION	78680
AIR NEW SOURCE PERMITS	REGISTRATION	78668

AIR NEW SOURCE PERMITS	REGISTRATION	78331
AIR NEW SOURCE PERMITS	REGISTRATION	79348
AIR NEW SOURCE PERMITS	REGISTRATION	79383
AIR NEW SOURCE PERMITS	REGISTRATION	79131
AIR NEW SOURCE PERMITS	REGISTRATION	79130
AIR NEW SOURCE PERMITS	REGISTRATION	79202
AIR NEW SOURCE PERMITS	REGISTRATION	78439
AIR NEW SOURCE PERMITS	REGISTRATION	79243
AIR NEW SOURCE PERMITS	REGISTRATION	78966
AIR NEW SOURCE PERMITS	REGISTRATION	78897
AIR NEW SOURCE PERMITS	REGISTRATION	79920
AIR NEW SOURCE PERMITS	REGISTRATION	79806
AIR NEW SOURCE PERMITS	REGISTRATION	80380
AIR NEW SOURCE PERMITS	REGISTRATION	80372
AIR NEW SOURCE PERMITS	REGISTRATION	80161
AIR NEW SOURCE PERMITS	REGISTRATION	80240
AIR NEW SOURCE PERMITS	REGISTRATION	80360
AIR NEW SOURCE PERMITS	REGISTRATION	80624
AIR NEW SOURCE PERMITS	REGISTRATION	81207
AIR NEW SOURCE PERMITS	REGISTRATION	81302
AIR NEW SOURCE PERMITS	REGISTRATION	81275
AIR NEW SOURCE PERMITS	REGISTRATION	81271
AIR NEW SOURCE PERMITS	REGISTRATION	81267
AIR NEW SOURCE PERMITS	REGISTRATION	81301
AIR NEW SOURCE PERMITS	REGISTRATION	82007
AIR NEW SOURCE PERMITS	REGISTRATION	50904
AIR NEW SOURCE PERMITS	REGISTRATION	50941
AIR NEW SOURCE PERMITS	REGISTRATION	51074
AIR NEW SOURCE PERMITS	REGISTRATION	51354
AIR NEW SOURCE PERMITS	REGISTRATION	51426
AIR NEW SOURCE PERMITS	REGISTRATION	51547
AIR NEW SOURCE PERMITS	REGISTRATION	81882

AIR NEW SOURCE PERMITS	REGISTRATION	81988
AIR NEW SOURCE PERMITS	REGISTRATION	81724
AIR NEW SOURCE PERMITS	REGISTRATION	81582
AIR NEW SOURCE PERMITS	REGISTRATION	82027
AIR NEW SOURCE PERMITS	REGISTRATION	37290
AIR NEW SOURCE PERMITS	REGISTRATION	82393
AIR NEW SOURCE PERMITS	REGISTRATION	82279
AIR NEW SOURCE PERMITS	REGISTRATION	82286
AIR NEW SOURCE PERMITS	REGISTRATION	82284
AIR NEW SOURCE PERMITS	REGISTRATION	83726
AIR NEW SOURCE PERMITS	REGISTRATION	82190
AIR NEW SOURCE PERMITS	REGISTRATION	84910
AIR NEW SOURCE PERMITS	REGISTRATION	86036
AIR NEW SOURCE PERMITS	REGISTRATION	85153
AIR NEW SOURCE PERMITS	REGISTRATION	85369
AIR NEW SOURCE PERMITS	REGISTRATION	85867
AIR NEW SOURCE PERMITS	REGISTRATION	85864
AIR NEW SOURCE PERMITS	EPA ID	PSDTX986
AIR NEW SOURCE PERMITS	REGISTRATION	84455
AIR NEW SOURCE PERMITS	PERMIT	83789
AIR NEW SOURCE PERMITS	REGISTRATION	83992
AIR NEW SOURCE PERMITS	REGISTRATION	82636
AIR NEW SOURCE PERMITS	REGISTRATION	84964
AIR NEW SOURCE PERMITS	PERMIT	83841
AIR NEW SOURCE PERMITS	REGISTRATION	83670
AIR NEW SOURCE PERMITS	PERMIT	83699
AIR NEW SOURCE PERMITS	PERMIT	83862
AIR NEW SOURCE PERMITS	REGISTRATION	82587
AIR NEW SOURCE PERMITS	REGISTRATION	82614
AIR NEW SOURCE PERMITS	REGISTRATION	85034

AIR NEW SOURCE PERMITS	REGISTRATION	85324
AIR NEW SOURCE PERMITS	REGISTRATION	83994
AIR NEW SOURCE PERMITS	REGISTRATION	84491
AIR NEW SOURCE PERMITS	REGISTRATION	82934
AIR NEW SOURCE PERMITS	REGISTRATION	82774
AIR NEW SOURCE PERMITS	REGISTRATION	86160
AIR NEW SOURCE PERMITS	REGISTRATION	83304
AIR NEW SOURCE PERMITS	REGISTRATION	83031
AIR NEW SOURCE PERMITS	PERMIT	83698
AIR NEW SOURCE PERMITS	EPA ID	N84
AIR NEW SOURCE PERMITS	PERMIT	83839
AIR NEW SOURCE PERMITS	PERMIT	83804
AIR NEW SOURCE PERMITS	PERMIT	83788
AIR NEW SOURCE PERMITS	PERMIT	83792
AIR NEW SOURCE PERMITS	PERMIT	83846
AIR NEW SOURCE PERMITS	REGISTRATION	83678
AIR NEW SOURCE PERMITS	AFS NUM	4803900041
PETROLEUM STORAGE TANK REGISTRATION	REGISTRATION	38910
WATER LICENSING	LICENSE	0200232
WASTEWATER LICENSING	LICENSE	WQ0000007000
IHW CORRECTIVE ACTION	SOLID WASTE REGISTRATION # (SWR)	30106
INDUSTRIAL AND HAZARDOUS WASTE COMPLIANCE PLANS	PERMIT	50161

Location: 2301 N BRAZOSPORT BLVD, FREEPORT, TX, 77541 Rating Date: 9/1/2008 Repeat Violator: NO

TCEQ Region: REGION 12 - HOUSTON

Date Compliance History Prepared: November 10, 2008

Agency Decision Requiring Compliance History: Enforcement

Compliance Period: November 10, 2003 to November 10, 2008

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

Name: NHameed Phone: 713-767-3629

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? | N/A |
| 3. If Yes, who is the current owner? | The Dow Chemical Company |
| 4. If Yes, who was/were the prior owner(s)? | N/A |
| 5. When did the change(s) in ownership occur? | N/A |

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: 11/11/2004

ADMINORDER 2003-0947-AIR-E

Classification: Moderate

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

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

Rqmt Prov: 46429 PERMIT

Description: Failure to demonstrate a VOC DRE of at least 99.99% as required by Permit No. 46429, SC 8.

Classification: Moderate

Citation: 30 TAC Chapter 116, SubChapter B 116.115(b)(2)

30 TAC Chapter 116, SubChapter B 116.115(c)

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

Rqmt Prov: 46429 MAERT PERMIT

Description: Failure to demonstrate compliance with VOC #/hr emission limits as required by Permit 46429 MAERT.

Classification: Moderate

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

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

Rqmt Prov: 46429 SC14 PERMIT

Description: Failure to provide a compliance test for NOx as specified in 40CFR60, Appendix A, Method 7E, § 2 as referenced to Method 6C, § 2.1 and 2.2.

3. Failure to provide a compliance test for NOx as specified in 40CFR60, Appendix A, Method 7E, § 2 as referenced to Method 6C, § 2.1 and 2.2.

Effective Date: 08/07/2005

ADMINORDER 2004-0572-AIR-E

Classification: Moderate

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

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

Rqmt Prov: TCEQ Air Permit #X-7386, SC#1 PERMIT

Description: Failed to prevent the premature failure of Primary Reactor R-1 rupture disk which resulted in the release of unauthorized emissions.

Classification: Minor

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

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

Rqmt Prov: NSR Permit 3301, Special Condition #9 PERMIT

Description: Failed to maintain logs whenever a chlorine leak is discovered in the unit.

Classification: Moderate

Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
5C THC Chapter 382, SubChapter A 382.085(b)

Rqmt Prov: NSR Permit 4022, Special Condition #7 PERMIT

Description: Failed to maintain a minimum of at least 8 weight percent caustic concentration in the series-operated D-206A/T-206A Scrubbers.

Classification: Moderate

Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
5C THC Chapter 382, SubChapter A 382.085(b)

Rqmt Prov: NSR Permit 3301, Special Condition #1 PERMIT

Description: Failed to adhere to the permitted limit in tons per year (EPN No. B47F1) for CO during CY 2002.

Classification: Moderate

Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 116, SubChapter B 116.116(a)
5C THC Chapter 382, SubChapter A 382.085(b)

Rqmt Prov: NSR Permit 4021, Special Condition #9 PERMIT

Description: Failed to operate the tail gas back-up-scrubber (EPN No. B22SV31) exclusively within the conditions of the permit.

Effective Date: 04/14/2006

ADMINORDER 2005-0716-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: TCEQ Flex Air Permit No. 20432, SC III-1 PERMIT

Description: Failed to prevent unauthorized emissions of 2,372.99 pounds (lbs) of volatile organic compounds (VOCs), 2,753.36 lbs of carbon monoxide (CO), and 100% opacity.

Classification: Minor

Citation: 30 TAC Chapter 101, SubChapter F 101.201(a)(1)
5C THC Chapter 382, SubChapter A 382.085(b)

Description: Failed to submit an initial report within 24 hours after the discovery of an emissions event.

Classification: Moderate

Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
5C THC Chapter 382, SubChapter A 382.085(b)

Rqmt Prov: Permit 834, Special Condition 1 PERMIT

Description: Failed to prevent unauthorized emissions of 1,174 pounds lbs of VOCs.

Classification: Moderate

Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
5C THC Chapter 382, SubChapter A 382.085(b)

Rqmt Prov: NSR Permit No. 5340, Special Condition 1 PERMIT

Description: Failed to prevent unauthorized emissions of 443.94 pounds lbs of VOCs.

Classification: Moderate

Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
5C THC Chapter 382, SubChapter A 382.085(b)

Rqmt Prov: TCEQ Air Permit #20996, SC #1 PERMIT

Description: Failed to prevent unauthorized emissions of 66.64 lbs of 1,2-butylene oxide, 3,905.8 lbs of VOCs, 482.98 lbs of ethylene oxide, and 22.54 lbs of propylene oxide.

Classification: Moderate

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

5C THC Chapter 382, SubChapter A 382.085(b)
Rqmt Prov: NSR Permit 48813, Special Condition 1 PERMIT
Description: Failed to prevent unauthorized emissions of 1,893 lbs VOCs.

Effective Date: 07/13/2007 **ADMINORDER 2006-2006-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: TCEQ Flex Air Permit 20432, SC Ch III-1 PERMIT
Description: Failed to prevent unauthorized emissions.

Classification: Moderate
Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
5C THC Chapter 382, SubChapter D 382.085(b)
Rqmt Prov: TCEQ Air Permit No. 7836, SC 1 PERMIT
Description: Failed to prevent unauthorized emissions.

Effective Date: 08/31/2007 **ADMINORDER 2006-2225-AIR-E**

Classification: Moderate
Citation: 30 TAC Chapter 116, SubChapter B 116.115(b)(2)(F)
Rqmt Prov: Permit No. 19519, MAERT PERMIT
Description: Failed to prevent unauthorized emissions.

Classification: Minor
Citation: 30 TAC Chapter 101, SubChapter F 101.201(a)(1)(B)
5C THC Chapter 382, SubChapter D 382.085(b)

Description: Failed to submit an emissions event report within 24 hours after discovery of the event. Specifically, the emissions event was discovered on July 16, 2004 at 2:00 p.m., but was not reported until July 17, 2005 at 10:00 p.m.

Classification: Moderate
Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
5C THC Chapter 382, SubChapter D 382.085(b)
Rqmt Prov: TCEQ Air Permit X-7386, SC 1 PERMIT

Description: Failed to prevent unauthorized emissions.

Classification: Moderate
Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
5C THC Chapter 382, SubChapter D 382.085(b)

Rqmt Prov: TCEQ Air Permit No. 19041, SC1 PERMIT

Description: Failed to prevent unauthorized emissions.

Classification: Minor
Citation: 30 TAC Chapter 101, SubChapter F 101.201(b)(1)(H)
5C THC Chapter 382, SubChapter D 382.085(b)

Description: Failed to include the applicable permit number in the Authorization section of the final emissions event report.

Effective Date: 04/03/2008 **ADMINORDER 2007-0573-AIR-E**

Classification: Moderate
Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B:122.143(4)

40 CFR Chapter 60, SubChapter C, PT 60, SubPT A 60.18(c)(3)(ii)
5C THC Chapter 382, SubChapter D 382.085(b)

Rqmt Prov: O-02313, SC 1.A. OP
Permit No. 37884, SC 6.A. PERMIT

Description: Failed to maintain a minimum net heating value of 200 BTU/scf on Polypropylene Flare F-600.

Classification: Moderate

Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)
5C THC Chapter 382, SubChapter D 382.085(b)

Rqmt Prov: O-02313, SC 8.A. OP
Permit No. 37884, SC 1 PERMIT

Description: Failed to meet the maximum allowable emission rate of 0.65 lb/hour for NOx on Polypropylene Flare F-600.

Classification: Minor

Citation: 30 TAC Chapter 115, SubChapter D 115.352(4)
30 TAC Chapter 115, SubChapter H 115.783(5)
30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)
40 CFR Chapter 60, SubChapter C, PT 60, SubPT DDD 60.562-2(a)
40 CFR Chapter 60, SubChapter C, PT 60, SubPT VV 60.482-6(a)(1)
5C THC Chapter 382, SubChapter D 382.085(b)

Rqmt Prov: O-02313, SC 8.A. OP
Permit No. 37884, SC 8.E. PERMIT

Description: Failed to seal an open-ended line with a second valve, blind flange, cap, or plug.

Classification: Moderate

Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
5C THC Chapter 382, SubChapter D 382.085(b)

Rqmt Prov: TCEQ Air Permit No. 48813, SC 1 PERMIT

Description: Failed to prevent unauthorized emissions.

Effective Date: 06/19/2008

ADMINORDER 2007-1756-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 Air Permit No. 834, SC 1 PERMIT

Description: Failed to prevent unauthorized emissions. Specifically, unauthorized emissions of 1,184 pounds of the highly reactive volatile organic compound ("HRVOC") ethylene were released through a 3-way diverter valve on the KO-132 knockout pot in the Polyethylene 4 Unit during an emissions event (Incident No. 96595) that occurred on August 27, 2007 and lasted one hour and 15 minutes.

Classification: Moderate

Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
5C THC Chapter 382, SubChapter D 382.085(b)

Rqmt Prov: TCEQ Air Permit No. 18569, SC1 PERMIT

Description: Failed to comply with the emissions limit of 0.15 pounds per hour ("lbs/hr") of carbon monoxide ("CO") and 400 parts per million volume ("ppmv") at 3.0% oxygen for the F-826 Heater, emissions point number ("EPN") B23S826.

Classification: Moderate

Citation: 30 TAC Chapter 101, SubChapter A 101.20(3)

30 TAC Chapter 116, SubChapter G 116.715(a)
30 TAC Chapter 117, SubChapter B 117.310(c)(1)
5C THC Chapter 382, SubChapter D 382.085(b)
Rqmt Prov: Permit 20432 and PST-TX-994, S.C. I-1 PERMIT
Description: Failed to prevent unauthorized emissions.

Effective Date: 08/15/2008

ADMINORDER 2007-1843-IHW-E

Classification: Major
Citation: 30 TAC Chapter 335, SubChapter H 335.221(a)(11)
30 TAC Chapter 335, SubChapter H 335.221(a)(6)
40 CFR Chapter 266, SubChapter I, PT 266, SubPT H 266.102(e)(2)(ii)(A)
40 CFR Chapter 266, SubChapter I, PT 266, SubPT H 266.103(c)(1)(v)
40 CFR Chapter 266, SubChapter I, PT 266, SubPT H 266.104(b)(1)
Rqmt Prov: V.I.3.b.1. PERMIT
Description: Failed to meet the regulatory limit for stack gas concentration of carbon monoxide ("CO") while burning hazardous waste in Boiler F-2820 (Permit Unit 30, NOR Unit 180).
Classification: Major
Citation: 30 TAC Chapter 335, SubChapter H 335.221(a)(13)
30 TAC Chapter 335, SubChapter H 335.221(a)(6)
40 CFR Chapter 266, SubChapter I, PT 266, SubPT H 266.102(e)(7)(ii)
40 CFR Chapter 266, SubChapter I, PT 266, SubPT H 266.103(g)
Rqmt Prov: V.I.3.b.2. PERMIT
Description: Failed to maintain a functioning automatic waste feed cutoff system.

Effective Date: 10/23/2008

ADMINORDER 2008-0478-AIR-E

Classification: Moderate
Citation: 30 TAC Chapter 101, SubChapter A 101.20(1)
30 TAC Chapter 101, SubChapter F 101.221(a)
30 TAC Chapter 116, SubChapter B 116.115(c)
40 CFR Chapter 60, SubChapter C, PT 60, SubPT A 60.18(c)(2)
40 CFR Chapter 60, SubChapter C, PT 60, SubPT A 60.18(e)
5C THSC Chapter 382 382.085(b)
Rqmt Prov: NSR Permit No. 834, SC 3 PERMIT
TCEQ Air Permit No. 834, SC 1 PERMIT
Description: Failed to prevent unauthorized emissions.
Classification: Moderate
Citation: 30 TAC Chapter 101, SubChapter A 101.20(3)
30 TAC Chapter 116, SubChapter G 116.715(a)
5C THSC Chapter 382 382.085(b)
Rqmt Prov: TCEQ Flex Air Permit 20432, SC CIII-1 PERMIT
Description: Failed to prevent unauthorized emissions.

Effective Date: 10/23/2008

ADMINORDER 2004-1344-MLM-E

Classification: Major
Citation: 30 TAC Chapter 116, SubChapter G 116.715(a)
5C THC Chapter 382, SubChapter A 382.085(b)
Rqmt Prov: Flexible Air Permit No. 20432/PST-TX-894 PERMIT

Description: Failed to prevent the lock-nut from falling off the positioner pin, which disconnected the feedback arm from the coupler block in the LHC-8. This resulted in the release of unauthorized emissions which exceeded permitted limits. Specifically, the total unauthorized emissions above the emissions cap from this incident were 80,525 lbs of VOCs, 4,599 lbs of benzene, and 10,050 lbs of CO.

Classification: Moderate

Citation: 30 TAC Chapter 115, SubChapter B 115.121(a)(1)
30 TAC Chapter 115, SubChapter B 115.122(a)
5C THC Chapter 382, SubChapter A 382.085(a)

Description: Failed to prevent the unauthorized emission of ethylene at the Dow's Plant B Polyethylene (PE) Unit for a period of 33 hours starting on April 7, 2003. The reported value of ethylene released to the atmosphere, as a result of malfunctioning of the Train 2 safety relief valve, was 203,000 lbs.

Classification: Moderate

Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
5C THSC Chapter 382 382.085(b)

Rqmt Prov: Air Permit No. X-7386, SC 1 PERMIT

Description: Failed to comply with the permitted limit established in the Maximum Allowable Emission Rate Table (MAERT) of Air Permit No. X-7386 for ethylene oxide. Specifically, the Respondent failed to prevent the unauthorized emission of ethylene oxide at the Dow's Hydroxyalkyl Acrylate (HHA Reactor System B6400) Unit for a period of one hour 45 minutes on March 12, 2003.

Classification: Moderate

Citation: 30 TAC Chapter 116, SubChapter B 116.115(b)(2)(G)
5C THSC Chapter 382 382.085(b)

Rqmt Prov: Permit 37884, MAERT PERMIT

Description: Failed to comply with the permitted limit established in the Maximum Allowable Emission Rate Table (MAERT) of Air Permit No. 37884 for propylene (C3H6O), carbon monoxide (CO), and nitric oxide (NOx). Specifically, the Respondent failed to prevent the unauthorized emission of C3H6O, CO, and NOx at the Dow's North American Propylene (NAPP-1) Unit during the period between January 4 and 25, 2003.

Classification: Moderate

Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
5C THC Chapter 382, SubChapter A 382.085(b)

Rqmt Prov: NSR Permit #19041, Special Condition #9 PERMIT

Description: Failed to have available the records to demonstrate that samples were being continuously collected from the bottoms of stripping towers T-444 and T-445.

Classification: Major

Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
5C THC Chapter 382, SubChapter A 382.085(b)

Rqmt Prov: Permit No. 19041, Special Condition #13 PERMIT

Description: Failed to use an approved method to establish the pounds per hour of VOCs emitted into the atmosphere from cooling towers CT-320 and CT-2320.

Classification: Minor

Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
5C THC Chapter 382, SubChapter A 382.085(b)

Rqmt Prov: Permit #19041, Special Condition #19.B PERMIT

Description: Failed to conduct a quarterly accuracy audit for the CEMS on Boiler No. 2 FTB-402 (EPN No. OC5SV404) for the third quarter (July through September) of 2002.

Classification: Moderate

Citation: 30 TAC Chapter 101, SubChapter A 101.20(2)
30 TAC Chapter 116, SubChapter B 116.115(c)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.163(c)(1)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.163(c)(2)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.168(f)(1)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.174(d)

5C THSC Chapter 382 382.085(b)

Rqmt Prov: Permit #19041, Special Conditions 15,16 PERMIT
Permit 19041, SC 1 PERMIT

Description: Failed to meet the requirements of the VOC leak detection and repair programs. Specifically, one pump was not attempted to be repaired within five days; and two pumps, one valve, and two connectors were not repaired within 15 days.

Classification: Major

Citation: 30 TAC Chapter 101, SubChapter A 101.20(2)
30 TAC Chapter 116, SubChapter B 116.115(c)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT TT 63.1004(b)
5C THSC Chapter 382 382.085(b)

Rqmt Prov: Permit 19041, SC 1 PERMIT

Description: Failed to perform VOC leak detection monitoring of valves according to 40 CFR Part 60, Appendix A-7, Method 21, 8.3.1 during the fourth quarter of 2003. The estimated amount of VOC emissions from the 25 valves were 20.24 lbs of VOCs.

Classification: Minor

Citation: 30 TAC Chapter 101, SubChapter F 101.201(b)
5C THSC Chapter 382 382.085(b)

Description: Failed to submit a complete final emissions event report.

Classification: Major

Citation: 30 TAC Chapter 335, SubChapter A 335.2(b)
30 TAC Chapter 335, SubChapter O 335.431
40 CFR Chapter 268, SubChapter I, PT 268, SubPT A 268.1(a)
40 CFR Chapter 268, SubChapter I, PT 268, SubPT D 268.40(a)

Rqmt Prov: HW Permit 50161 III-E 10 and V-EE PERMIT

Description: Failed to prevent the disposal of unauthorized hazardous waste into an on-site hazardous waste landfill. Specifically, instead of sending the waste to an on-site incinerator, or performing the on-site waste stabilization treatment, 355 cubic yards of non-treated waste (contaminated soil) was placed in Cell IV of Dow's Block-51 landfill between the period of January 14, 2003 and September 23, 2003.

Classification: Moderate

Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
5C THSC Chapter 382, SubChapter A 382.085(b)

Rqmt Prov: TCEQ Air Permit 834, Special Condition 1 PERMIT

Description: Failed to prevent unauthorized emissions of 10,085 pounds ("lbs") of the highly reactive volatile organic compound ("HRVOC") ethylene during an emissions event that occurred on May 26, 2004 and lasted 4 hours and 30 minutes. These emissions were not authorized by the permit.

Classification: Minor

Citation: 30 TAC Chapter 101, SubChapter F 101.201(a)(1)(B)
5C THSC Chapter 382, SubChapter D 382.085(b)

Description: Failed to submit an emissions event report within 24 hours after discovery of the event. Specifically, the emissions event was discovered on May 26, 2004 at 9:30 a.m., but was not reported until May 27, 2006 at 1:59 p.m.

Classification: Moderate

Citation: 30 TAC Chapter 116, SubChapter G 116.715(a)
5C THSC Chapter 382, SubChapter A 382.085(b)

Rqmt Prov: TCEQ Flex Air Permit #20432, SC ChIII-1 PERMIT

Description: Failed to prevent unauthorized emissions.

Classification: Moderate

Citation: 30 TAC Chapter 111, SubChapter A 111.111(a)(8)(A)
30 TAC Chapter 116, SubChapter B 116.115(c)
5C THSC Chapter 382, SubChapter A 382.085(b)

Rqmt Prov: Permit No. 834, SC 1 PERMIT

Description: Failed to prevent unauthorized emissions and failed to prevent visible emissions with an opacity greater than 30% for any 6-minute period.

Classification: Moderate

Citation: 30 TAC Chapter 116, SubChapter G 116.715(a)
5C THC Chapter 382, SubChapter A 382.085(b)

Rqmt Prov: TCEQ Flex Air Permit #20432, SC #III-1 PERMIT

Description: Failed to comply with Air Permit No. 20432, Special Condition III-1, by allowing the release of unauthorized emissions at the Light Hydrocarbon 7 facility during a nonexempt emissions event which lasted from 4:35 a.m. until 9:30 a.m. on August 13, 2004. The emissions event was caused by an error made by maintenance personnel who left a valve closed on a backup hydrogen line for one of the facility's reactors.

Classification: Moderate

Citation: 30 TAC Chapter 101, SubChapter A 101.20(1)
30 TAC Chapter 111, SubChapter A 111.111(a)(4)(A)(i)
30 TAC Chapter 116, SubChapter G 116.715(a)
40 CFR Chapter 60, SubChapter C, PT 60, SubPT A 60.18(c)(2)
5C THC Chapter 382, SubChapter D 382.085(b)

Rqmt Prov: Flexible Permit 20432, SC III-1 PERMIT
Permit 20432, SC 111-17 PERMIT

Description: Failed to prevent unauthorized emissions, failed to prevent visible emissions from a process gas flare for more than five minutes in any two-hour period, and failed to operate a process gas flare with a pilot flame present at all times.

Classification: Minor

Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
5C THC Chapter 382, SubChapter A 382.085(b)

Rqmt Prov: NSR Permit #20776, Special Condition #8 PERMIT

Description: Failed to maintain pH and water flow rates for Scrubber D-27. The maximum allowable pH is 4.0 and the minimum required flow rate is 0.6 gallons per minute or 5 pounds per minute (lbs/min)]. On 9/24/03 at 2:10 p.m., redundant pH readings were 9.1 and 8.6 and were caused by blow-back of trimethylamine (TMA) in the line after unloading a railcar.

Classification: Minor

Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
5C THC Chapter 382, SubChapter A 382.085(b)

Rqmt Prov: NSR Permit #20776, Special Cond. #7.G. PERMIT

Description: Failed to conduct an instrument-monitored fugitive emission inspection on a pump, Tag #EAI273155, for two quarters, fourth quarter 2003 and first quarter 2004.

Classification: Minor

Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
5C THC Chapter 382, SubChapter A 382.085(b)

Rqmt Prov: NSR Perm. #20776, Spec. Cond. #6.E & 7.E PERMIT

Description: Failed to maintain caps and/or plugs on four open-ended lines in the B6600 Quat 188 Plant for components EAI272070 (T-100c/EPN B6610V100), EAI272990 (T-100c/EPN B6610V100), EAI1273010 (D-57/EPN Unknown), and EAI272471 (P-53A/EPN B6610V53).

Classification: Moderate

Citation: 30 TAC Chapter 116, SubChapter B 116.115(b)(2)(F)
5C THC Chapter 382, SubChapter A 382.085(b)

Rqmt Prov: NSR Permit #20776, General Cond. #7 PERMIT

Description: Failed to retain two-year fugitive emission monitoring records for 21 components in methylene chloride service and 22 components in volatile organic compound (VOC) service.

Classification: Moderate

Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
5C THC Chapter 382, SubChapter A 382.085(b)

Rqmt Prov: NSR Permit #20776, Special Cond. #10 PERMIT

Description: Failed to monitor for fugitive emissions all connectors, regardless of size, in VOC service. A total of 649 components were not monitored.

Classification: Major

Citation: 30 TAC Chapter 116, SubChapter B 116.110(a)
5C THC Chapter 382, SubChapter A 382.085(b)
5C THSC Chapter 382 382.0518(a)

Description: Failed to obtain a permit prior to constructing and operating methylene chloride extraction Tower T-100c.

Classification: Major

Citation: 30 TAC Chapter 116, SubChapter G 116.715(a)
5C THC Chapter 382, SubChapter A 382.085(b)

Rqmt Prov: TCEQ Flexible Air Permit 20432, SC III-1 PERMIT

Description: Failed to prevent unauthorized emissions of 1,160 lbs of volatile organic compounds ("VOCs") from the Light Hydrocarbons - 7 Unit, Facility ID No. B72L7RX1, emission point number ("EPN") B60F3 and 546.9 lbs of Carbon Monoxide and 90% opacity from Facility ID No. B60L7F1 during an emissions event that occurred on April 28, 2005 and lasted 1 hour and 36 minutes.

Classification: Major

Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
5C THC Chapter 382, SubChapter A 382.085(b)

Rqmt Prov: TCEQ Air Permit 834, SC1 PERMIT

Description: Failed to prevent unauthorized emissions of 2,369 pounds ("lbs") of the HRVOC Ethylene at the Polyethylene IV Unit, Facility ID NO. B41P4RX1, emission point number ("EPN") B41RL1 during an emissions event that occurred on March 30, 2005 and lasted 15 minutes. These emissions are not authorized by the permit.

Classification: Minor

Citation: 30 TAC Chapter 115, SubChapter D 115.352(4)
30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)
40 CFR Chapter 60, SubChapter C, PT 60, SubPT VV 60.482-6(a)(1)
5C THC Chapter 382, SubChapter A 382.085(b)

Rqmt Prov: 19519, SC 5E PERMIT
48813, SC 5E PERMIT
6803, SC 9E PERMIT
834, SC 9E PERMIT
8567, SC 8E PERMIT
O-02215, SC 1A & SC 11 OP

Description: Failed to equip 27 open-ended lines with a cap or plug within the operating areas of B27P3FU3, B25P2FU1, B25P2FU2, B37P4FU1, B41P4FU1, and B77APFU1 between February 27, 2004 and August 29, 2004. Specifically during the deviation reporting periods of January 28, 2004 to July 27, 2004 and July 28, 2004 to September 30, 2004 there were 27 deviations reported for open-ended lines in VOC service with no second valve, blind flange, cap, or plug.

Classification: Minor

Citation: 30 TAC Chapter 115, SubChapter D 115.352(2)
30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)
5C THC Chapter 382, SubChapter A 382.085(b)

Rqmt Prov: 834, SC 9I PERMIT
O-02215, SC 1A & SC 11 OP

Description: Failed to either repair or place on the delay of repair list 10 leaking components in Unit B41P4FU1 within 15 days after the leak was discovered.

Classification: Minor

Citation: 30 TAC Chapter 122, SubChapter B 122.145(2)(A)
5C THC Chapter 382, SubChapter A 382.085(b)

Rqmt Prov: O-02215, General Terms & Conditions OP

Description: Failed to include the hydrogen chloride leak in Unit B41P4CT1 on July 2, 2004 as a deviation in the August 24, 2004 deviation report.

Classification: Moderate

Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)
5C THC Chapter 382, SubChapter A 382.085(b)

Rqmt Prov: 48813, SC 1 PERMIT
O-02215 SC 11 OP

Description: Failed to prevent unauthorized emissions of 663 lbs of Carbon released on February 10, 2004 for approximately two minutes, which were not reported within 24 hours (reported in a deviation report submitted August 24, 2004).

Classification: Moderate

Citation: 30 TAC Chapter 115, SubChapter D 115.352(4)
30 TAC Chapter 116, SubChapter G 116.715(a)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.167(a)(1)
5C THC Chapter 382, SubChapter A 382.085(b)

Rqmt Prov: 20432, SC 2E PERMIT

Description: failed to equip 27 open-ended lines with a cap or plug within the operating areas of B19G1FU1, B23G2FU2, and B68ALFU1 between April 19, 2004 and April 18, 2005. Specifically, during the deviation reporting periods of April 19, 2004 to October 18, 2004 and October 19, 2004 to April 18, 2005 there were 27 deviations reported for open-ended lines in hazardous air pollutant ("HAP") and/or volatile organic compound ("VOC") service with no second valve, blind flange, cap, or plug.

Classification: Minor

Citation: 30 TAC Chapter 116, SubChapter G 116.715(a)
5C THC Chapter 382, SubChapter A 382.085(b)

Rqmt Prov: 20432, SC 3A PERMIT

Description: failed to conduct auditory, visual, and olfactory (AVO) checks one shift each day for Hydrogen Chloride and Chlorine leaks within the operating area of B68ALFU1 between August 14 and 18, 2004.

Classification: Minor

Citation: 30 TAC Chapter 115, SubChapter D 115.354(2)(C)
5C THC Chapter 382, SubChapter A 382.085(b)

Description: Failed to monitor five valves in highly reactive VOC ("HRVOC") service during the second quarter of 2004.

Classification: Minor

Citation: 30 TAC Chapter 116, SubChapter G 116.715(a)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT G 63.152(c)(2)(ii)
5C THC Chapter 382, SubChapter A 382.085(b)

Rqmt Prov: 20432, SC I-22C PERMIT

Description: Failed to convert in-stack concentrations of Carbon Monoxide emissions to pounds per hour ("lbs/hr") from scrubber B19G1T210 for the 3rd and 4th quarters of 2004.

Classification: Major

Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
5C THC Chapter 382, SubChapter A 382.085(b)

Rqmt Prov: TCEQ Air Permit 7386, SC 1 PERMIT

Description: Exceeded the maximum allowable emission rate (MAER) for volatile organic compounds (VOC) during an avoidable emissions event at the Hydroxy Alkyl Acrylates Plant on December 23, 2004. Dow failed to close a valve after maintenance which resulted in an over pressurization, blown rupture disc, and release of 1,061 pounds (lbs) of propylene oxide from the VS-1 Scrubber. The duration was one hour and 45 minutes. The MAER for VOCs is 0.20 lbs per hour.

Classification: Moderate

Citation: 30 TAC Chapter 101, SubChapter A 101.20(2)

30 TAC Chapter 115, SubChapter D 115.354(2)(C)
30 TAC Chapter 122, SubChapter B 122.143(4)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.168(b)(1)
5C THSC Chapter 382 382.085(b)

Rqmt Prov: O-01388, SC 1A OP

Description: Failed to monitor 269 valves in Volatile Hazardous Air Pollutant ("VHAP") service in the Chemicals and Metals (1) area from February 3, 2004 to September 30, 2004, as reported during the deviation reporting period of August 3, 2004 to February 2, 2005.

Classification: Moderate

Citation: 30 TAC Chapter 101, SubChapter A 101.20(2)
30 TAC Chapter 115, SubChapter D 115.352(4)
30 TAC Chapter 122, SubChapter B 122.143(4)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.167(a)(1)
5C THSC Chapter 382 382.085(b)

Rqmt Prov: O-01388, SC 1A OP

Description: Failed to equip 49 open-ended lines in the Chemicals and Metals (1) area with a second valve, blind flange, cap, or plug. Specifically, during the deviation reporting periods of February 3, 2004 to August 3, 2004 and August 3, 2004 to February 2, 2005, it was reported there were 11 open-ended lines in VHAP service on February 3, 2004, and 38 open-ended lines in VHAP service from August 17, 2004 to January 7, 2005.

Classification: Moderate

Citation: 30 TAC Chapter 101, SubChapter A 101.20(2)
30 TAC Chapter 122, SubChapter B 122.143(4)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT G 63.148(b)
5C THSC Chapter 382 382.085(b)

Rqmt Prov: O-01388, SC 1A OP

Description: Failed to conduct an annual Audio, Visual, and Olfactory ("AVO") inspection of the closed vent system in VHAP service in the Chemicals and Metals (1) area, as reported during the deviation reporting period of August 3, 2004 to February 2, 2005.

Classification: Minor

Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)
5C THSC Chapter 382 382.085(b)

Rqmt Prov: 48478, SC 2 PERMIT
5339, SC 11 PERMIT
5661, SC 6 PERMIT

Description: Failed to adequately maintain records regarding repairs and replacements done as a result of leaks documented during AVO inspections of the Chemicals and Metals (1) areas once per shift, as reported during the deviation reporting period of August 3, 2004 to February 2, 2005.

Classification: Moderate

Citation: 30 TAC Chapter 116, SubChapter B 116.116(b)(1)
5C THSC Chapter 382 382.085(b)

Description: Failed to operate within permit representations. Specifically, TCEQ Air Permit No. 5661 does not authorize chlorine emissions from the J-20 HCl absorber in the Chemicals and Metals (1) area (EPN B15V20), however, during the deviation reporting period of August 3, 2004 to February 2, 2005, unauthorized chlorine emissions from the J-20 HCl absorber were reported.

Classification: Moderate

Citation: 30 TAC Chapter 101, SubChapter A 101.20(2)
30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT SS 63.994(b)(1)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT YY 63.1103(d)

Rqmt Prov: 7531, SC 6 PERMIT

O-02210, STC 10 OP

Description: Failed to establish minimum liquid to gas ("L/G") ratio for the operation of the scrubber (halogen reduction device) in the polycarbonate facility in the engineering thermoplastics unit during the performance test conducted on December 12, 2002. Without the L/G ratio established, compliance with the mass emission rate requirement of less than 0.45 kilograms per hour ("kg/hr") cannot be determined.

Classification: Moderate

Citation: 30 TAC Chapter 101, SubChapter A 101.20(2)
30 TAC Chapter 116, SubChapter B 116.115(b)(2)(C)
30 TAC Chapter 116, SubChapter B 116.115(b)(2)(F)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT NNNNN 63.9000(a)
5C THC Chapter 382, SubChapter A 382.085(b)

Rqmt Prov: Permit 46431, General Condition 8 PERMIT
Permit 46431, SC 5 PERMIT

Description: Failed to comply with hydrogen chloride ("HCl") emissions limits of 0.40 pounds per hour ("lbs/hr") and 12.0 parts per million ("ppm") and Chlorine ("Cl₂") emissions limits of 0.03 lbs/hr and failed to comply with the minimum destruction efficiency of 99.99% for volatile organic compounds (VOCs).

Classification: Moderate

Citation: 30 TAC Chapter 115, SubChapter B 115.126(1)(B)
30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)
5C THC Chapter 382, SubChapter D 382.085(b)

Rqmt Prov: NSR 22072, SC 4 PERMIT
Title V O-02212, SC 1E OP
Title V O-02212, SC 16 OP

Description: Failed to meet the flare requirements for 3 flares (EPN Nos. BSRF601, BSRFMW1T, and BSRFMNF). Specifically, Dow Chemical failed to monitor the flare pilots flames in order to maintain the continuous presence of a flame using a thermocouple or other equipment device which detects the presence of a flame.

Classification: Minor

Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)
5C THC Chapter 382, SubChapter D 382.085(b)

Rqmt Prov: NSR 22072, SC 4 PERMIT
NSR 22072, SC 5 PERMIT
Title V O-02212, SC 16 OP
Title V O-02212, SE 1E OP

Description: Failed to maintain the continuous presence of a flame on five occasions for three flares (EPN Nos. BSRFMNF, BSRF601, and BSRFMW1T).

Classification: Minor

Citation: 30 TAC Chapter 106, SubChapter K 106.262(3)
30 TAC Chapter 122, SubChapter B 122.143(4)
5C THC Chapter 382, SubChapter D 382.085(b)

Rqmt Prov: Title V O-02212, SC 17 OP

Description: Failed to submit Permit by Rule ("PBR") notification (Form PI-7) within ten days following modifications to the brine process for the aromatic storage wells (EPN Nos. BSRPSR2 and BSRPR2L) in to Lake Warder and SR-2 (benzene brine ponds).

Classification: Minor

Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)
5C THC Chapter 382, SubChapter D 382.085(b)

Rqmt Prov: Permit 22072, SC 8F PERMIT
Title V Permit O-02212, SC 16 OP

Description: Failed to monitor 504 valves and 1,716 connectors in the fugitive emissions area (EPN No.

BSRFUBRCK) during the third and fourth quarters of 2004, and the second quarter of 2005. The estimated amount of volatile organic compound ("VOCs") fugitive emissions during this time period of 273 days is 14.71 tons from the valves, and 2.82 tons from the connectors, for a combined total of 17.53 tons of VOCs. The permitted limit of VOCs from this EPN is 2.04 tons per year.

Classification: Minor

Citation: 30 TAC Chapter 122, SubChapter B 122.145(2)(A)
5C THC Chapter 382, SubChapter D 382.085(b)

Description: Failed to report the deviation of failure to conduct fugitive emissions monitoring on 504 valves and 1,716 connectors in the fugitive area (EPN No. BSRFUBRCK) during the second quarter of 2005 in the deviation report dated August 5, 2005.

Classification: Minor

Citation: 30 TAC Chapter 117, SubChapter B 117.208(d)(7)
30 TAC Chapter 122, SubChapter B 122.143(4)
5C THC Chapter 382, SubChapter D 382.085(b)

Rqmt Prov: Title V O-02212, SC 1D OP

Description: Failed to check for proper operation of the engine (EPN No. BSRGE601) by recorded measurements of nitrogen oxide ("NOx") and carbon monoxide ("CO") emissions after engine maintenance was conducted on February 26, 2005.

Classification: Minor

Citation: 30 TAC Chapter 117, SubChapter B 117.216(a)(5)
30 TAC Chapter 122, SubChapter B 122.143(4)
5C THC Chapter 382, SubChapter D 382.085(b)

Rqmt Prov: Title V O-02212, SC 1D OP

Description: Failed to include the specific rule citations for units with a claimed exemption from the emission specifications of 30 TEX. ADMIN. CODE § 117.206 in the final control report submitted March 31, 2005.

Classification: Moderate

Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
5C THC Chapter 382, SubChapter D 382.085(b)

Rqmt Prov: NSR Permit No. 834, SC 1 PERMIT

Description: Failed to prevent unauthorized emissions. Specifically, unauthorized emissions of 3, 401 lbs of the HRVOC ethylene were released from an inconel rupture disc in the Polyethylene #4 Unit (Incident 73950) during an emissions event that occurred on April 4, 2006 and lasted 6 minutes. These emissions are not authorized by the permit.

Classification: Minor

Citation: 30 TAC Chapter 101, SubChapter F 101.201(a)(1)(B)
30 TAC Chapter 122, SubChapter B 122.143(4)
5C THSC Chapter 382 382.085(b)

Rqmt Prov: Permit No. O-02215, SC 2.F. PERMIT

Description: Failed to report within 24 hours the emissions event of 663 lbs of Carbon released on February 10, 2004 for approximately two minutes. The regulated entity reported the event on a deviation report on August 24, 2004.

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	11/12/2003	(254614)
2	11/24/2003	(296017)

3	11/26/2003	(250021)
4	11/30/2003	(126059)
5	11/30/2003	(249732)
6	12/15/2003	(254080)
7	12/24/2003	(296018)
8	01/09/2004	(253974)
9	01/09/2004	(254701)
10	01/09/2004	(254710)
11	01/21/2004	(296019)
12	02/03/2004	(257672)
13	02/05/2004	(258950)
14	02/05/2004	(260440)
15	02/06/2004	(251940)
16	02/11/2004	(260085)
17	02/11/2004	(260441)
18	02/11/2004	(260442)
19	02/23/2004	(260927)
20	02/26/2004	(296001)
21	03/10/2004	(261603)
22	03/10/2004	(264415)
23	03/15/2004	(261987)
24	03/15/2004	(261999)
25	03/15/2004	(262011)
26	03/22/2004	(263436)
27	03/22/2004	(296004)
28	03/29/2004	(264628)
29	03/30/2004	(264622)
30	04/12/2004	(264619)
31	04/13/2004	(265611)
32	04/19/2004	(296006)
33	04/23/2004	(258324)
34	04/23/2004	(265028)
35	04/29/2004	(255279)
36	04/30/2004	(254073)
37	04/30/2004	(255002)
38	05/12/2004	(257994)
39	05/14/2004	(248280)
40	05/14/2004	(263118)
41	05/17/2004	(253533)
42	05/24/2004	(31438)
43	05/26/2004	(258253)
44	05/26/2004	(352355)
45	06/01/2004	(254581)
46	06/02/2004	(272991)
47	06/03/2004	(258305)
48	06/16/2004	(247738)
49	06/28/2004	(352356)
50	06/30/2004	(266880)
51	06/30/2004	(267508)

52	06/30/2004	(267938)
53	07/06/2004	(258308)
54	07/07/2004	(258307)
55	07/20/2004	(278387)
56	07/26/2004	(352357)
57	07/28/2004	(276490)
58	07/28/2004	(282417)
59	07/28/2004	(282469)
60	08/16/2004	(281509)
61	08/17/2004	(273076)
62	08/17/2004	(284165)
63	08/17/2004	(284292)
64	08/18/2004	(277856)
65	08/24/2004	(352358)
66	08/27/2004	(266751)
67	08/27/2004	(267540)
68	08/27/2004	(279078)
69	08/29/2004	(265955)
70	08/31/2004	(272564)
71	08/31/2004	(272729)
72	08/31/2004	(272789)
73	08/31/2004	(272814)
74	08/31/2004	(273127)
75	08/31/2004	(273416)
76	08/31/2004	(273678)
77	08/31/2004	(273881)
78	08/31/2004	(274129)
79	09/01/2004	(267453)
80	09/01/2004	(277902)
81	09/07/2004	(291280)
82	09/07/2004	(333240)
83	09/23/2004	(352359)
84	10/22/2004	(352360)
85	10/31/2004	(276789)
86	10/31/2004	(276897)
87	10/31/2004	(289698)
88	11/01/2004	(284370)
89	11/01/2004	(285135)
90	11/01/2004	(285137)
91	11/01/2004	(286768)
92	11/04/2004	(338243)
93	11/05/2004	(334295)
94	11/05/2004	(334318)
95	11/22/2004	(335797)
96	11/24/2004	(352361)
97	12/06/2004	(284914)
98	12/10/2004	(114224)
99	12/13/2004	(334315)
100	12/13/2004	(336762)

101	12/13/2004	(339850)
102	12/16/2004	(114225)
103	12/16/2004	(285097)
104	12/16/2004	(286819)
105	12/16/2004	(289573)
106	12/17/2004	(286731)
107	12/17/2004	(338429)
108	12/17/2004	(339587)
109	12/20/2004	(339116)
110	12/20/2004	(339119)
111	12/21/2004	(334606)
112	12/22/2004	(289567)
113	12/22/2004	(289575)
114	12/23/2004	(381958)
115	12/28/2004	(251988)
116	12/28/2004	(256034)
117	12/31/2004	(338842)
118	01/05/2005	(285365)
119	01/06/2005	(339121)
120	01/07/2005	(338837)
121	01/07/2005	(339138)
122	01/07/2005	(339147)
123	01/07/2005	(339177)
124	01/09/2005	(339130)
125	01/14/2005	(338682)
126	01/17/2005	(249734)
127	01/21/2005	(337408)
128	01/21/2005	(381959)
129	01/27/2005	(347186)
130	01/31/2005	(347762)
131	01/31/2005	(347857)
132	01/31/2005	(347883)
133	02/01/2005	(347843)
134	02/21/2005	(337409)
135	02/21/2005	(337411)
136	02/21/2005	(344830)
137	02/21/2005	(344930)
138	02/21/2005	(345433)
139	02/21/2005	(345507)
140	02/23/2005	(346345)
141	02/23/2005	(346354)
142	02/24/2005	(339179)
143	02/25/2005	(345303)
144	02/28/2005	(381956)
145	03/02/2005	(372448)
146	03/07/2005	(372281)
147	03/07/2005	(372291)
148	03/10/2005	(346208)
149	03/18/2005	(346346)

150	03/18/2005	(346350)
151	03/21/2005	(346710)
152	03/22/2005	(346347)
153	03/23/2005	(347781)
154	03/28/2005	(381957)
155	04/01/2005	(345046)
156	04/08/2005	(347573)
157	04/21/2005	(575527)
158	05/04/2005	(338714)
159	05/04/2005	(347119)
160	05/06/2005	(376209)
161	05/10/2005	(346362)
162	05/17/2005	(376212)
163	05/17/2005	(376237)
164	05/17/2005	(376280)
165	05/20/2005	(392573)
166	05/23/2005	(262475)
167	05/23/2005	(345033)
168	05/23/2005	(376200)
169	05/24/2005	(380324)
170	05/26/2005	(575530)
171	05/27/2005	(374664)
172	05/27/2005	(379484)
173	05/31/2005	(346355)
174	06/02/2005	(376058)
175	06/02/2005	(376059)
176	06/14/2005	(350783)
177	06/14/2005	(375259)
178	06/15/2005	(380845)
179	06/17/2005	(376522)
180	06/22/2005	(350704)
181	06/24/2005	(396413)
182	06/24/2005	(396517)
183	06/24/2005	(575533)
184	06/28/2005	(376054)
185	06/29/2005	(347598)
186	07/01/2005	(378760)
187	07/08/2005	(376056)
188	07/11/2005	(393361)
189	07/12/2005	(393369)
190	07/13/2005	(397022)
191	07/21/2005	(393364)
192	07/21/2005	(575536)
193	07/22/2005	(397876)
194	07/22/2005	(397878)
195	07/22/2005	(397880)
196	07/22/2005	(397881)
197	07/28/2005	(380321)
198	08/04/2005	(398933)

199	08/05/2005	(393374)
200	08/05/2005	(396199)
201	08/05/2005	(398937)
202	08/08/2005	(396518)
203	08/11/2005	(377164)
204	08/12/2005	(285295)
205	08/15/2005	(393373)
206	08/15/2005	(398936)
207	08/19/2005	(393378)
208	08/19/2005	(404732)
209	08/22/2005	(396197)
210	08/22/2005	(575539)
211	08/24/2005	(403273)
212	08/25/2005	(397853)
213	08/25/2005	(404533)
214	08/29/2005	(398935)
215	08/30/2005	(398938)
216	09/01/2005	(403238)
217	09/12/2005	(406575)
218	09/14/2005	(431669)
219	09/22/2005	(575541)
220	09/28/2005	(402693)
221	09/28/2005	(406914)
222	09/30/2005	(402695)
223	10/05/2005	(374026)
224	10/21/2005	(575543)
225	10/26/2005	(431242)
226	10/26/2005	(432043)
227	10/26/2005	(432097)
228	10/26/2005	(432895)
229	10/26/2005	(432935)
230	10/26/2005	(432986)
231	11/15/2005	(435315)
232	11/25/2005	(575545)
233	11/30/2005	(373986)
234	11/30/2005	(435278)
235	12/23/2005	(575547)
236	12/30/2005	(433116)
237	01/10/2006	(436188)
238	01/17/2006	(376062)
239	01/17/2006	(593182)
240	01/23/2006	(575550)
241	01/24/2006	(575549)
242	01/27/2006	(436181)
243	02/03/2006	(436165)
244	02/07/2006	(436297)
245	02/09/2006	(435249)
246	02/26/2006	(575523)
247	02/27/2006	(436730)

248	02/27/2006	(453320)
249	03/02/2006	(431805)
250	03/17/2006	(340573)
251	03/23/2006	(433180)
252	03/23/2006	(436917)
253	03/24/2006	(374721)
254	03/24/2006	(575525)
255	03/28/2006	(436841)
256	03/31/2006	(436922)
257	03/31/2006	(454296)
258	04/11/2006	(454294)
259	04/17/2006	(433179)
260	04/17/2006	(436288)
261	04/17/2006	(454234)
262	04/17/2006	(459765)
263	04/19/2006	(459137)
264	04/19/2006	(575528)
265	04/26/2006	(433177)
266	05/09/2006	(459139)
267	05/11/2006	(289568)
268	05/11/2006	(459075)
269	05/11/2006	(459108)
270	05/17/2006	(461234)
271	05/17/2006	(462138)
272	05/17/2006	(463636)
273	05/17/2006	(465607)
274	05/24/2006	(466817)
275	05/25/2006	(462747)
276	05/25/2006	(462749)
277	05/25/2006	(462949)
278	05/26/2006	(575531)
279	05/31/2006	(457316)
280	06/15/2006	(481001)
281	06/22/2006	(458889)
282	06/26/2006	(575534)
283	07/14/2006	(457318)
284	07/14/2006	(480399)
285	07/14/2006	(480559)
286	07/14/2006	(480854)
287	07/14/2006	(484040)
288	07/14/2006	(485731)
289	07/14/2006	(486688)
290	07/17/2006	(462746)
291	07/17/2006	(462748)
292	07/17/2006	(482291)
293	07/18/2006	(481382)
294	07/21/2006	(457258)
295	07/21/2006	(482501)
296	07/21/2006	(575537)

297	08/07/2006	(438858)
298	08/07/2006	(466313)
299	08/08/2006	(479807)
300	08/11/2006	(247956)
301	08/11/2006	(457284)
302	08/14/2006	(483077)
303	08/14/2006	(483124)
304	08/14/2006	(483129)
305	08/15/2006	(462106)
306	08/15/2006	(489783)
307	08/15/2006	(490271)
308	08/18/2006	(338817)
309	08/18/2006	(338822)
310	08/18/2006	(465699)
311	08/18/2006	(480155)
312	08/18/2006	(483113)
313	08/22/2006	(484727)
314	08/22/2006	(490091)
315	08/23/2006	(457302)
316	08/23/2006	(457315)
317	08/23/2006	(484737)
318	08/23/2006	(509637)
319	08/24/2006	(575540)
320	08/25/2006	(484732)
321	08/25/2006	(509011)
322	08/28/2006	(484741)
323	08/28/2006	(490104)
324	08/28/2006	(497117)
325	08/31/2006	(457309)
326	09/01/2006	(487340)
327	09/01/2006	(487866)
328	09/01/2006	(489195)
329	09/01/2006	(489802)
330	09/01/2006	(497542)
331	09/01/2006	(508889)
332	09/01/2006	(509414)
333	09/01/2006	(509679)
334	09/01/2006	(509787)
335	09/07/2006	(510182)
336	09/07/2006	(510901)
337	09/08/2006	(489713)
338	09/08/2006	(489814)
339	09/08/2006	(490183)
340	09/08/2006	(490187)
341	09/08/2006	(510155)
342	09/18/2006	(509863)
343	09/18/2006	(575542)
344	09/29/2006	(513116)
345	10/11/2006	(512347)

346	10/12/2006	(515660)
347	10/12/2006	(515784)
348	10/25/2006	(509774)
349	10/25/2006	(516468)
350	10/30/2006	(509665)
351	10/30/2006	(512117)
352	11/03/2006	(575544)
353	11/07/2006	(516589)
354	11/07/2006	(516999)
355	11/08/2006	(515899)
356	11/10/2006	(517068)
357	11/15/2006	(518266)
358	11/21/2006	(519005)
359	11/21/2006	(575546)
360	11/28/2006	(340237)
361	11/30/2006	(519472)
362	11/30/2006	(532072)
363	12/04/2006	(518648)
364	12/04/2006	(518693)
365	12/04/2006	(518746)
366	12/04/2006	(518847)
367	12/05/2006	(518987)
368	12/05/2006	(518994)
369	12/05/2006	(519433)
370	12/07/2006	(532408)
371	12/12/2006	(532985)
372	12/13/2006	(512466)
373	12/15/2006	(512613)
374	12/18/2006	(512614)
375	12/20/2006	(512546)
376	12/20/2006	(518862)
377	12/22/2006	(575548)
378	01/03/2007	(533504)
379	01/08/2007	(533024)
380	01/08/2007	(535581)
381	01/16/2007	(535585)
382	01/17/2007	(537051)
383	01/18/2007	(512465)
384	01/19/2007	(532792)
385	01/19/2007	(532798)
386	01/19/2007	(535582)
387	01/19/2007	(535584)
388	01/19/2007	(535587)
389	01/25/2007	(535586)
390	02/14/2007	(537570)
391	02/15/2007	(532539)
392	02/16/2007	(532501)
393	02/16/2007	(538485)
394	02/20/2007	(537571)

395	02/26/2007	(575524)
396	02/27/2007	(518917)
397	02/28/2007	(540981)
398	03/22/2007	(536044)
399	03/22/2007	(538381)
400	03/22/2007	(542323)
401	03/23/2007	(538331)
402	03/23/2007	(542214)
403	03/23/2007	(543884)
404	03/23/2007	(553947)
405	03/23/2007	(554153)
406	03/23/2007	(554156)
407	03/26/2007	(554162)
408	03/26/2007	(575526)
409	03/30/2007	(489438)
410	03/30/2007	(489600)
411	04/02/2007	(532635)
412	04/09/2007	(554546)
413	04/09/2007	(554548)
414	04/12/2007	(543310)
415	04/18/2007	(514268)
416	04/19/2007	(531924)
417	04/19/2007	(531943)
418	04/19/2007	(535999)
419	04/19/2007	(575529)
420	04/24/2007	(555828)
421	04/27/2007	(532788)
422	04/30/2007	(515463)
423	05/07/2007	(511310)
424	05/07/2007	(514793)
425	05/08/2007	(511545)
426	05/08/2007	(511682)
427	05/08/2007	(511841)
428	05/08/2007	(533412)
429	05/08/2007	(557566)
430	05/08/2007	(557567)
431	05/09/2007	(555628)
432	05/10/2007	(558404)
433	05/10/2007	(558512)
434	05/11/2007	(462109)
435	05/14/2007	(398934)
436	05/14/2007	(516545)
437	05/14/2007	(516561)
438	05/14/2007	(516563)
439	05/14/2007	(559614)
440	05/14/2007	(559653)
441	05/16/2007	(680309)
442	05/17/2007	(513875)
443	05/18/2007	(554549)

444	05/21/2007	(538079)
445	05/23/2007	(560258)
446	05/24/2007	(575532)
447	05/25/2007	(560273)
448	05/25/2007	(560284)
449	05/25/2007	(560311)
450	05/25/2007	(561809)
451	05/25/2007	(561826)
452	05/25/2007	(561833)
453	05/31/2007	(541434)
454	05/31/2007	(561026)
455	05/31/2007	(561133)
456	06/01/2007	(562217)
457	06/01/2007	(562270)
458	06/08/2007	(515992)
459	06/11/2007	(555138)
460	06/18/2007	(639497)
461	06/21/2007	(575535)
462	06/22/2007	(563821)
463	06/22/2007	(563870)
464	06/25/2007	(556660)
465	06/26/2007	(556265)
466	06/26/2007	(557013)
467	07/03/2007	(565234)
468	07/09/2007	(564733)
469	07/11/2007	(532793)
470	07/16/2007	(561727)
471	07/16/2007	(563110)
472	07/18/2007	(575538)
473	07/31/2007	(564288)
474	08/06/2007	(564280)
475	08/06/2007	(568639)
476	08/06/2007	(568658)
477	08/09/2007	(563748)
478	08/09/2007	(564283)
479	08/09/2007	(570823)
480	08/10/2007	(563126)
481	08/13/2007	(571129)
482	08/13/2007	(571130)
483	08/14/2007	(568640)
484	08/14/2007	(568679)
485	08/15/2007	(570829)
486	08/15/2007	(571282)
487	08/16/2007	(543314)
488	08/16/2007	(563635)
489	08/21/2007	(601683)
490	08/28/2007	(572069)
491	08/30/2007	(568613)
492	08/31/2007	(512665)

493	08/31/2007	(543556)
494	08/31/2007	(568778)
495	09/05/2007	(571679)
496	09/06/2007	(573171)
497	09/07/2007	(571291)
498	09/07/2007	(573940)
499	09/13/2007	(639567)
500	09/20/2007	(601684)
501	09/28/2007	(564652)
502	09/28/2007	(564703)
503	09/28/2007	(565429)
504	10/01/2007	(639530)
505	10/01/2007	(639548)
506	10/01/2007	(639562)
507	10/03/2007	(543554)
508	10/03/2007	(573174)
509	10/03/2007	(574254)
510	10/04/2007	(594925)
511	10/10/2007	(566738)
512	10/10/2007	(567008)
513	10/11/2007	(567653)
514	10/12/2007	(571215)
515	10/15/2007	(567828)
516	10/15/2007	(597177)
517	10/17/2007	(601685)
518	10/18/2007	(569770)
519	10/18/2007	(569776)
520	10/18/2007	(569781)
521	10/18/2007	(569785)
522	10/18/2007	(569841)
523	10/19/2007	(594927)
524	10/23/2007	(566959)
525	10/25/2007	(594923)
526	10/25/2007	(594929)
527	10/25/2007	(597157)
528	10/26/2007	(570354)
529	10/26/2007	(573825)
530	10/26/2007	(574064)
531	10/26/2007	(597159)
532	11/02/2007	(574293)
533	11/05/2007	(595620)
534	11/05/2007	(595623)
535	11/07/2007	(573328)
536	11/08/2007	(639482)
537	11/08/2007	(639492)
538	11/08/2007	(639514)
539	11/09/2007	(596374)
540	11/15/2007	(597987)
541	11/19/2007	(619609)

542	11/21/2007	(569810)
543	11/26/2007	(567381)
544	11/26/2007	(568480)
545	11/26/2007	(570030)
546	11/26/2007	(570031)
547	11/27/2007	(570515)
548	11/27/2007	(570526)
549	11/27/2007	(599343)
550	11/27/2007	(608728)
551	11/28/2007	(568431)
552	11/30/2007	(596467)
553	12/04/2007	(596985)
554	12/07/2007	(573480)
555	12/07/2007	(597234)
556	12/12/2007	(602163)
557	12/13/2007	(573122)
558	12/18/2007	(619610)
559	12/19/2007	(599266)
560	12/19/2007	(612289)
561	12/20/2007	(598138)
562	12/21/2007	(567605)
563	01/03/2008	(613134)
564	01/09/2008	(597713)
565	01/09/2008	(597717)
566	01/09/2008	(597720)
567	01/10/2008	(595622)
568	01/10/2008	(595628)
569	01/17/2008	(595617)
570	01/17/2008	(619611)
571	01/24/2008	(614965)
572	01/28/2008	(610685)
573	01/29/2008	(615960)
574	01/30/2008	(613449)
575	01/30/2008	(613921)
576	01/31/2008	(613922)
577	02/06/2008	(616278)
578	02/06/2008	(616428)
579	02/11/2008	(615351)
580	02/11/2008	(616039)
581	02/11/2008	(616044)
582	02/11/2008	(616066)
583	02/11/2008	(616069)
584	02/11/2008	(616074)
585	02/11/2008	(617102)
586	02/13/2008	(566562)
587	02/13/2008	(610665)
588	02/15/2008	(617796)
589	02/21/2008	(672136)
590	02/27/2008	(613204)

591	02/27/2008	(613391)
592	03/03/2008	(617333)
593	03/05/2008	(637300)
594	03/06/2008	(595630)
595	03/10/2008	(617583)
596	03/10/2008	(619156)
597	03/13/2008	(614400)
598	03/13/2008	(672137)
599	03/18/2008	(615813)
600	03/18/2008	(615931)
601	03/28/2008	(617344)
602	04/03/2008	(618253)
603	04/04/2008	(638867)
604	04/04/2008	(638869)
605	04/15/2008	(510759)
606	04/16/2008	(617688)
607	04/16/2008	(672138)
608	04/21/2008	(646462)
609	04/23/2008	(653894)
610	04/30/2008	(636279)
611	05/02/2008	(571287)
612	05/02/2008	(640190)
613	05/06/2008	(637948)
614	05/15/2008	(640191)
615	05/16/2008	(638424)
616	05/16/2008	(640170)
617	05/17/2008	(657073)
618	05/20/2008	(690043)
619	05/21/2008	(640193)
620	05/23/2008	(639898)
621	06/02/2008	(638228)
622	06/05/2008	(682036)
623	06/10/2008	(573942)
624	06/10/2008	(646379)
625	06/13/2008	(682091)
626	06/16/2008	(690044)
627	06/25/2008	(681430)
628	06/30/2008	(669890)
629	07/01/2008	(683482)
630	07/02/2008	(618777)
631	07/03/2008	(683481)
632	07/03/2008	(684038)
633	07/07/2008	(618795)
634	07/07/2008	(641624)
635	07/07/2008	(654362)
636	07/07/2008	(681433)
637	07/09/2008	(684176)
638	07/11/2008	(684580)
639	07/18/2008	(685963)

640 07/18/2008 (686024)
 641 07/18/2008 (690045)
 642 07/21/2008 (687078)
 643 07/23/2008 (687195)
 644 07/30/2008 (686426)
 645 08/04/2008 (687176)
 646 08/07/2008 (680041)
 647 08/07/2008 (681762)
 648 08/08/2008 (688099)
 649 08/11/2008 (681763)
 650 08/20/2008 (610600)
 651 08/22/2008 (636773)
 652 08/26/2008 (699841)
 653 08/27/2008 (636747)
 654 08/27/2008 (680057)
 655 08/27/2008 (687896)
 656 08/28/2008 (612382)
 657 08/29/2008 (687897)
 658 08/29/2008 (701063)
 659 08/29/2008 (701692)
 660 09/10/2008 (702501)
 661 10/02/2008 (681432)
 662 10/09/2008 (699820)
 663 10/09/2008 (703861)
 664 11/03/2008 (703911)
 665 11/07/2008 (701151)
 666 11/10/2008 (700025)

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

Date: 11/30/2003 (249732)
Self Report? NO **Classification:** Moderate
Citation: 30 TAC Chapter 101, SubChapter F 101.201(a)(1)(B)
 30 TAC Chapter 116, SubChapter B 116.115(b)(1)
Description: Dow failed to report an emissions event (Investigation No. 435278) after final emissions from a scheduled maintenance event exceeded emissions reported on the Initial Notification.

Date: 11/30/2003 (249734)
Self Report? NO **Classification:** Moderate
Citation: 30 TAC Chapter 101, SubChapter F 101.201(a)(1)(B)
 30 TAC Chapter 116, SubChapter B 116.115(b)(1)
Description: Dow failed to notify the TCEQ when the maintenance event became an emissions event.

Date: 12/02/2003 (250021)
Self Report? NO **Classification:** Moderate
Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
Rqmt Prov: PERMIT 7531

Description: Failure to follow Reference Method 18 when testing for methylene chloride emissions from F-732 thermal oxidizer.

Date: 01/12/2004 (253974)

Self Report? NO Classification: Moderate

Citation: 30 TAC Chapter 116, SubChapter B 116.116(b)(1)(A)
30 TAC Chapter 116, SubChapter G 116.715(a)

Rqmt Prov: PA Flexible Permit #20432, SC #4 and # I-17

Description: Failure to meet the minimum heating value of 300 Btu/scf for a steam-assisted flare (FS-801) in accordance with 40 CFR 60.18 when waste streams containing significant quantities of hydrogen are sent to the flare.

Self Report? NO Classification: Moderate

Citation: 30 TAC Chapter 116, SubChapter G 116.715(c)(7)

Description: **Dow exceeded the NOx emission cap established in the Maximum Allowable Emission Rate (MAER) table under Flexible Permit # 20432 for the three emission points (EPNs B68FU1, B70FU1 and B70F801).**

Date: 02/06/2004 (251940)

Self Report? NO Classification: Moderate

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

Rqmt Prov: PERMIT TCEQ AIR PERMIT #21596, SC #1

Description: **Avoidable emissions event with emissions of benzene.**

Date: 03/29/2004 (264622)

Self Report? NO Classification: Minor

Citation: 30 TAC Chapter 290, SubChapter D 290.45(d)(2)(B)(ii)

Description: Failure to provide a ground storage capacity which is equal to 50% of the maximum daily demand.

Date: 03/31/2004 (296006)

Self Report? YES Classification: Moderate

Citation: 30 TAC Chapter 305, SubChapter F 305.125(1)
TWC Chapter 26 26.121(a)

Description: Failure to meet the limit for one or more permit parameter

Date: 04/29/2004 (255279)

Self Report? NO Classification: Moderate

Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
5C THC Chapter 382, SubChapter A 382.085(b)

Rqmt Prov: PERMIT TCEQ Air Permit #8567 S.C.#1

Description: **Exceeded VOC permit limit during an emissions event.**

Date: 04/30/2004 (254073)

Self Report? NO Classification: Moderate

Citation: 30 TAC Chapter 106, SubChapter D 106.124(5)(A)
30 TAC Chapter 116, SubChapter B 116.110(a)(4)
5C THC Chapter 382, SubChapter A 382.085(b)

Description: **Exceeded VOC PBR limit during an emissions event.**

Date: 06/01/2004 (254581)

Self Report? NO Classification: Moderate
Citation: 30 TAC Chapter 106, SubChapter K 106.261(2)
5C THC Chapter 382, SubChapter A 382.085(b)
Description: **Avoidable emissions event.**

Date: 06/03/2004 (258305)

Self Report? NO Classification: Moderate
Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)
40 CFR Chapter 60, SubChapter C, PT 60, SubPT A 60.18(c)(3)(ii)

Rqmt Prov: PERMIT 1472
OP O-02220

Description: Failure to maintain minimum BTU requirement in gas stream to Flare A26VELR02.

Self Report? NO Classification: Moderate

Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)

Rqmt Prov: PERMIT 1472
OP O-02220

Description: Failure to maintain the minimum operating temperature in Waste Gas Boiler EPN A26S500.

Self Report? NO Classification: Minor

Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)

Rqmt Prov: PERMIT 1472
OP O-02220

Description: Exceedance of permitted fill/drain rates for Tank D-275, Tank D-550 and Tank D-20M.

Self Report? NO Classification: Moderate

Citation: 30 TAC Chapter 116, SubChapter B 116.115(b)(2)(G)
30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)

Rqmt Prov: PERMIT 1472
OP O-02220

Description: **Exceedance of MAERs for Tank R-1B and Tank D-15C.**

Self Report? NO Classification: Minor

Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)

Rqmt Prov: PERMIT 1472
OP O-02220

Description: Failure to use submerged fill loading for railcar equipment A26VELR02 and drum loading equipment A26VELR04.

Self Report? NO Classification: Minor

Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)

Rqmt Prov: PERMIT 1472
OP O-02220

Description: Failure to equip open-ended valve with a plug.

Date: 06/30/2004 (352357)

Self Report? YES Classification: Moderate
Citation: 30 TAC Chapter 305, SubChapter F 305.125(1)

TWC Chapter 26 26.121(a)

Description: Failure to meet the limit for one or more permit parameter

Date: 07/12/2004 (258308)

Self Report? NO Classification: Minor

Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)
40 CFR Chapter 60, SubChapter C, PT 60, SubPT VV 60.482-6(a)(1)

Rqmt Prov: PERMIT 18561
OP O-02221

Description: Failure to cap open-ended lines.

Self Report? NO Classification: Minor

Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)

Rqmt Prov: PERMIT 18561
OP O-02221

Description: Failure to maintain partial pressure records.

Date: 07/12/2004 (258307)

Self Report? NO Classification: Minor

Citation: 30 TAC Chapter 122, SubChapter B 122.145(2)(A)

Description: Failure to report a deviation in the semiannual deviation report.

Self Report? NO Classification: Minor

Citation: 30 TAC Chapter 115, SubChapter D 115.352(4)
30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)

Rqmt Prov: PERMIT 19519, Special Condition 5(E)
PERMIT 48813, Special Condition 5(E)
PERMIT 834, Special Condition 9(E)
PERMIT 8567, Special Condition 8(E)
OP O-02215

Description: Failure to seal open-ended lines.

Self Report? NO Classification: Moderate

Citation: 30 TAC Chapter 115, SubChapter D 115.354(2)(C)
30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)

Rqmt Prov: PERMIT 8567
OP O-02215

Description: Failure to monitor valves for fugitive emissions.

Self Report? NO Classification: Moderate

Citation: 30 TAC Chapter 115, SubChapter D 115.354(2)(B)
30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)

Rqmt Prov: PERMIT 8567
OP O-02215

Description: Failure to monitor pump seals for fugitive emissions.

Self Report? NO Classification: Moderate

Citation: 30 TAC Chapter 116, SubChapter B 116.115(b)(2)(G)
30 TAC Chapter 122, SubChapter B 122.143(4)

Rqmt Prov: PERMIT 19519
OP O-02215

Description: Cooling tower emissions exceeded MAER for VOCs.

Self Report? NO Classification: Minor
Citation: 30 TAC Chapter 122, SubChapter B 122.144(1)(E)
Description: Failure to maintain records of daily flare observations.
Self Report? NO Classification: Minor
Citation: 30 TAC Chapter 106, SubChapter K 106.262(4)
30 TAC Chapter 122, SubChapter B 122.143(4)
Rqmt Prov: OP O-02215
Description: Late submittal of PBR registration.
Self Report? NO Classification: Moderate
Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)
40 CFR Chapter 60, SubChapter C, PT 60, SubPT A 60.18(c)(3)(ii)
Rqmt Prov: PERMIT 834
OP O-02215
Description: Failure to maintain minimum BTU requirement in feed stream to flare.
Self Report? NO Classification: Minor
Citation: 30 TAC Chapter 115, SubChapter D 115.352(2)
30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)
Rqmt Prov: PERMIT 19519, Special Condition 5(I)
PERMIT 48813, Special Condition 5(I)
PERMIT 6803, Special Condition 8(I)
PERMIT 8567, Special Condition 8(H)
OP O-02215
Description: Failure to re-monitor fugitive components within 15 days.

Date: 08/27/2004 (267540)

Self Report? NO Classification: Moderate
Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
5C THC Chapter 382, SubChapter A 382.085(b)
Rqmt Prov: PERMIT TCEQ Air Permit #21596, SC #1
Description: Exceeded VOC permit limit during an avoidable emissions event.

Date: 08/27/2004 (266751)

Self Report? NO Classification: Moderate
Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
5C THC Chapter 382, SubChapter A 382.085(b)
Rqmt Prov: PERMIT TCEQ Air Permit #21596, SC #1
Description: Dow exceeded VOC permit limit during an avoidable emissions event.

Date: 08/29/2004 (265955)

Self Report? NO Classification: Moderate
Citation: 30 TAC Chapter 116, SubChapter B 116.115(b)(1)
5C THC Chapter 382, SubChapter A 382.085(b)
Description: Exceeded HCL permit limit.

Date: 11/05/2004 (338243)

Self Report? NO Classification: Minor
Citation: 30 TAC Chapter 101, SubChapter A 101.20(2)
30 TAC Chapter 115, SubChapter B 115.126(1)(A)(i)
30 TAC Chapter 116, SubChapter B 116.115(b)(2)

30 TAC Chapter 122, SubChapter B 122.143(4)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT U 63.506(d)
Rqmt Prov: PA NSR Permit #3320, General Provision #5
OP Special Term & Condition #6A
Description: Failure to maintain continuous data records of thermal oxidizer (EPN B20TOX)
firebox temperature on 8/27/2003, 3/3/2004 and 7/6/2004.

Self Report? NO Classification: Minor

Citation: 30 TAC Chapter 122, SubChapter B 122.143(4)

Rqmt Prov: OP Special Term and Condition #5

Description: Failure to maintain working pressure data of Acrylonitrile Storage Tank D-121A
on 8/27/2003, 3/3/2004 and 7/6/2004.

Self Report? NO Classification: Minor

Citation: 30 TAC Chapter 115, SubChapter D 115.352(2)

30 TAC Chapter 122, SubChapter B 122.143(4)

Rqmt Prov: OP Special Term and Condition #1A

Description: Failure to monitor with an instrument after repair a leaking component found via
AVO inspection on 11/14/2003 and 1/3/2004.

Self Report? NO Classification: Minor

Citation: 30 TAC Chapter 101, SubChapter A 101.20(2)

30 TAC Chapter 115, SubChapter D 115.356(2)(F)(iii)

30 TAC Chapter 115, SubChapter D 115.356(2)(F)(iv)

30 TAC Chapter 116, SubChapter B 116.115(b)(2)

30 TAC Chapter 122, SubChapter B 122.143(4)

40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.181(d)(2)

40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.181(d)(3)

Rqmt Prov: PA NSR Permit #3320, General Provision #7K

OP Special Term and Condition #1A

Description: Failure to keep records of the date of first repair attempt and date of leak repair
for two leaking valves.

Date: 11/22/2004 (335797)

Self Report? NO Classification: Moderate

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

30 TAC Chapter 122, SubChapter B 122.143(4)

Rqmt Prov: OP O-02210, SC No. 10

PA Permit No. 7531, SC No. 1

Description: **Unauthorized emissions which could have been avoided by good design,
operation or maintenance practices.**

Self Report? NO Classification: Minor

Citation: 30 TAC Chapter 115, SubChapter D 115.352(4)

30 TAC Chapter 116, SubChapter B 116.115(c)

30 TAC Chapter 122, SubChapter B 122.143(4)

40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.167(a)(1)

40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.167(a)(2)

Rqmt Prov: OP O-02210, SC No. 10

PA Permit No. 7531, SC No. 3E.

Description: Failure to cap or plug open-ended lines per the Permit No. 7531, SC No. 3E

Date: 12/16/2004 (289573)

Self Report? NO Classification: Moderate

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

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

Description: Failure to report an emissions event within 24 hours following incident 35402
Self Report? NO Classification: Moderate
Citation: 30 TAC Chapter 101, SubChapter F 101.201(a)(1)(B)
Description: Failed to report an emissions event within 24 hours during Incident 35402

Date: 12/22/2004 (289567)
Self Report? NO Classification: Moderate
Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
5C THC Chapter 382, SubChapter A 382.085(b)
Rqmt Prov: PERMIT 5340
Description: Incident 40337 was an avoidable emissions event.

Date: 12/28/2004 (334606)
Self Report? NO Classification: Minor
Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.167(a)(1)
Rqmt Prov: PERMIT 2472, SC 9E
PERMIT 2773, SC12E
OP O-02206, SC 1A and SC 12

Description: Failure to plug open ended valves.
Self Report? NO Classification: Moderate
Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)
Rqmt Prov: PERMIT 770, SC 1
OP O-02206, SC 12

Description: THROX unit exceeded CO MAER.
Self Report? NO Classification: Minor
Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)
Rqmt Prov: PERMIT 770, SC 6
OP O-02206, SC 12

Description: Exceeded vinyl chloride average feedrate limit.
Self Report? NO Classification: Minor
Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)
Rqmt Prov: PERMIT 770, SC 18
OP O-02206, SC 12

Description: Exceeded firebox temperatures for THROX & TOX

Self Report? NO Classification: Moderate
Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)
Rqmt Prov: PERMIT 770, SC 17
OP O-02206, SC 12

Description: Flowmeters on vent stream to TOX not operational.
Self Report? NO Classification: Moderate
Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)
Rqmt Prov: PERMIT 770, SC 1
OP O-02206, SC 12

Description: Flare A32CSF1 exceeded hourly VOC MAER
Self Report? NO Classification: Moderate

Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.168(d)(4)
Rqmt Prov: PERMIT 2472, SC 9F
PERMIT 2773, SC 12F
OP O-02206, SC 1A and SC 12
Description: Failure to monitor valves and pressure sensing devices
Self Report? NO Classification: Moderate
Citation: 30 TAC Chapter 122, SubChapter B 122.143(4)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.174(b)(3)(iii)
Rqmt Prov: OP O-02206, SC 1A
Description: Failure to monitor connectors

Date: 12/28/2004 (256034)
Self Report? NO Classification: Moderate
Citation: 30 TAC Chapter 116, SubChapter B 116.115(b)
5C THC Chapter 382, SubChapter A 382.085(b)
Rqmt Prov: PERMIT 941
Description: **Incident 7827 was an avoidable emissions event.**

Date: 12/31/2004 (338842)
Self Report? NO Classification: Moderate
Citation: 30 TAC Chapter 101, SubChapter F 101.201(a)(2)(H)
30 TAC Chapter 101, SubChapter F 101.201(c)
Description: Dow failed to report accurately. Avoidable emissions event during Incident 43280.
Self Report? NO Classification: Major
Citation: 30 TAC Chapter 116, SubChapter B 116.115(a)
30 TAC Chapter 116, SubChapter B 116.115(b)
5C THC Chapter 382, SubChapter A 382.085(b)
Rqmt Prov: PERMIT TCEQ Air Permit No. 48479 SC 1 and 4
Description: **Incident #43280 was avoidable.**

Date: 12/31/2004 (381959)
Self Report? YES Classification: Moderate
Citation: 30 TAC Chapter 305, SubChapter F 305.125(1)
TWC Chapter 26 26.121(a)
Description: Failure to meet the limit for one or more permit parameter

Date: 01/14/2005 (338682)
Self Report? NO Classification: Moderate
Citation: 30 TAC Chapter 122, SubChapter B 122.143(4)
Rqmt Prov: OP FOP O-02214, Spec Terms/Cond. 1.D.
PERMIT Standard Permit #49187
Description: **Dow exceeded the hourly emission limit for CO on unit B246PGT62 as authorized by Standard Permit (SP) 49187, at the following times:**
a) 8/13/03, 16:00 to 17:00, release of 290.38 lbs/hr, an exceedence of 213%
b) 7/1/04, 19:00 to 20:00, release of 129 lbs/hr, an exceedence of 39%
Self Report? NO Classification: Moderate
Citation: 30 TAC Chapter 122, SubChapter B 122.143(4)

Rqmt Prov: OP FOP O-02214, Spec. Terms/Conds. #1.D.
PERMIT Standard Permit #49187

Description: Dow exceeded the hourly emission limit for NOx on unit B246PGT62 as authorized by the Standard Permit (SP) 49187 limit of 38.3 lbs/hr, at eight (8) documented times.

Self Report? NO Classification: Moderate
Citation: 30 TAC Chapter 116, SubChapter B 116.115(b)(2)(G)
30 TAC Chapter 122, SubChapter B 122.143(4)

Rqmt Prov: OP FOP O-02214, Spec. Terms/Conds. #1.A.
PERMIT NSR Permit #9044, Gen. Conditions #8

Description: Dow exceeded the hourly emission limit for NOx on unit B246PGT63 as authorized by the NSR Permit 9044 limit of 585 lbs/hr, on 1/6/04, from 11:00 to 12:00, with a release of 590.89 lbs/hr, an exceedence of 1%.

Self Report? NO Classification: Moderate
Citation: 30 TAC Chapter 116, SubChapter B 116.115(b)(2)(G)
30 TAC Chapter 122, SubChapter B 122.143(4)

Rqmt Prov: OP FOP O-2214, Spec. Terms/Conds. #1.A.
PERMIT NSR Permit #9046, Gen. Condition #8

Description: Dow exceeded the hourly emission limit for NOx on unit B246PGT66 as authorized by the NSR Permit 9046 limit of 826.99 lbs/hr, documented as eighteen (18) occurrences.

Self Report? NO Classification: Minor
Citation: 30 TAC Chapter 117, SubChapter B 117.219(d)(5)
40 CFR Chapter 60, SubChapter C, PT 60, SubPT A 60.7(d)

Description: Dow failed to accurately report periods of excess emissions for NOx in two semi-annual NOx RACT reports, dated January 14, 2004, and June 14, 2004.

Self Report? NO Classification: Minor
Citation: 30 TAC Chapter 117, SubChapter B 117.219(d)
30 TAC Chapter 122, SubChapter B 122.143(4)
40 CFR Chapter 60, SubChapter C, PT 60, SubPT A 60.7(c)

Rqmt Prov: OP FOP O-02214, Spec. Terms/Cond. #1.A.

Description: Dow failed to make a timely submission of a semi-annual NOx RACT report. The deadline for the report submittal was 12/15/03, and the report was not submitted until 1/14/04.

Date: 03/23/2005 (347781)

Self Report? NO Classification: Minor
Citation: 30 TAC Chapter 101, SubChapter A 101.20(1)
30 TAC Chapter 115, SubChapter D 115.352(4)

Rqmt Prov: 30 TAC Chapter 116, SubChapter B 116.115(c)
40 CFR Chapter 60, SubChapter C, PT 60, SubPT VV 60.482-6(a)(1)
PERMIT NSR Permit No. 37884, SC 8E

Description: Failed to seal open-ended lines.

Self Report? NO Classification: Minor
Citation: 30 TAC Chapter 115, SubChapter H 115.781(b)(3)

Description: Failed to perform quarterly fugitive monitoring.

Self Report? NO Classification: Minor
Citation: 30 TAC Chapter 115, SubChapter H 115.782(b)(1)

Description: Failed to attempt to repair leaks.

Self Report? NO Classification: Minor
Citation: 30 TAC Chapter 115, SubChapter H 115.782(b)(2)

Description: Failed to attempt to repair leaks.

Self Report? NO Classification: Minor

Citation: 30 TAC Chapter 122, SubChapter B 122.143(4)
Rqmt Prov: OP Title V Permit No. O-02313, SC 14
Description: Failed to meet risk management plan requirements.
Self Report? NO Classification: Moderate
Citation: 30 TAC Chapter 101, SubChapter A 101.20(1)
30 TAC Chapter 116, SubChapter B 116.115(c)
40 CFR Chapter 60, SubChapter C, PT 60, SubPT A 60.18(c)(3)(ii)
Rqmt Prov: PERMIT NSR Permit No. 37884, SC 6A
Description: Failed to maintain a minimum Btu for a flare.
Self Report? NO Classification: Moderate
Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
Rqmt Prov: PERMIT NSR Permit No. 37884, SC 1
Description: Failed to meet maximum allowable emission rates.
Self Report? NO Classification: Minor
Citation: 30 TAC Chapter 101, SubChapter F 101.201(b)
Description: Failed to create a final record of an emissions event.
Self Report? NO Classification: Moderate
Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
Rqmt Prov: PERMIT NSR Permit No. 37884, SC 1
Description: Failed to meet maximum allowable emission rates.

Date: 03/31/2005 (575527)

Self Report? YES Classification: Moderate
Citation: 30 TAC Chapter 305, SubChapter F 305.125(1)
TWC Chapter 26 26.121(a)
Description: Failure to meet the limit for one or more permit parameter

Date: 05/04/2005 (338714)

Self Report? NO Classification: Moderate
Citation: 30 TAC Chapter 122, SubChapter B 122.143(4)
Rqmt Prov: OP FOP O-02205, Special Condition #9
Description: Dow failed to record the outlet gas temperature, at least weekly, of scrubber B5010SV110, for the weeks beginning 8/21/03, 10/5/03, 11/9/03, 11/30/03, 12/7/03, 12/14/03, 12/21/03, and 12/28/03.

Self Report? NO Classification: Moderate
Citation: 30 TAC Chapter 122, SubChapter B 122.143(4)

Rqmt Prov: OP FOP O-02205, Special Condition #9
Description: Dow failed to comply with the requirement to operate the scrubber B5010SV110 under the maximum stack gas temperature of 95 degrees F.

Self Report? NO Classification: Moderate
Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)
Rqmt Prov: OP FOP O-02205, Special Condition #10
PERMIT NSR Permit #20607, Special Condition #7

Description: Dow failed to comply with the permit condition by filling a tank truck without employing the vapor balancing method from the truck to the tank.

Self Report? NO Classification: Minor
Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)

Rqmt Prov: OP FOP O-02205, Special Condition #10
PERMIT NSR Permit #20774, Special Cond. #15.E.

Description: Dow failed to maintain caps and/or plugs on nine open-ended lines in the B5016

Contract Manufacturing Plant.
Self Report? NO Classification: Moderate
Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)
Rqmt Prov: OP FOP O-02205, Special Condition #10
PERMIT NSR Permit #20774, Spec. Cond. #9

Description: Dow failed to maintain the water flow rate minimum on Scrubber T-543 during periods of vent gas flow.

Self Report? NO Classification: Moderate
Citation: 30 TAC Chapter 116, SubChapter B 116.110(a)
30 TAC Chapter 122, SubChapter B 122.143(4)
5C THC Chapter 382, SubChapter A 382.05181(a)
5C THC Chapter 382, SubChapter A 382.085(b)

Rqmt Prov: OP FOP O-02205, Gen. Terms and Conditions

Description: **Dow failed to register the production processes of various Maxistab products under either a PBR or NSR permit.**

Date: 05/24/2005 (380324)

Self Report? NO Classification: Minor
Citation: 30 TAC Chapter 122, SubChapter B 122.143(4)
Rqmt Prov: OP FOP O-02217, Special Condition #1

Description: Dow failed to keep monthly visual inspection records for three cold solvent degreasers.

Self Report? NO Classification: Minor
Citation: 30 TAC Chapter 122, SubChapter B 122.145(2)(C)

Description: Dow failed to report eighteen deviations in the First Semi-Annual Report, reporting period October 16, 2003, through April 15, 2004.

Self Report? NO Classification: Minor
Citation: 30 TAC Chapter 116, SubChapter B 116.115(b)(2)(G)
30 TAC Chapter 122, SubChapter B 122.143(4)
Rqmt Prov: OP FOP O-02217, Special Condition #15
PERMIT NSR Permit #21596, General Condition #8

Description: **Dow failed to minimize emissions on 12/24/03 by allowing absorbent pads contaminated with styrene used during a pump replacement to be discarded into a secondary containment area, which then collected rain water.**

Date: 06/17/2005 (376522)

Self Report? NO Classification: Moderate
Citation: 30 TAC Chapter 115, SubChapter D 115.352(4)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.167(a)(1)

Description: Failure to equip open-ended lines with a cap or plug.

Self Report? NO Classification: Minor
Citation: 30 TAC Chapter 101, SubChapter F 101.201(b)

Description: Failure to create records of five non-reportable emissions events within the required time frame.

Self Report? NO Classification: Moderate
Citation: 30 TAC Chapter 116, SubChapter G 116.715(a)
Rqmt Prov: PA NSR Permit 20432, SC I-8

Description: Failure to complete pressure testing of tank trucks for loading operations.

Self Report? NO Classification: Moderate
Citation: 40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.163(b)(1)

Description: Failure to monitor five pump seals monthly from March 2004 through July 2004.

Self Report? NO Classification: Moderate

Citation: 40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.173(a)(1)
 Description: Failure to monitor three agitators monthly from March 2004 through July 2004.
 Self Report? NO Classification: Moderate
 Citation: 40 CFR Chapter 61, SubChapter C, PT 61, SubPT FF 61.354(c)
 Description: Failure to inspect continuous parameter monitoring data from EPNs OC3U3B901, OC3U3B902, OC3U3B903 daily from January 16, 2004 through January 29, 2004. Failure to inspect continuous parameter monitoring data from EPNs OC3U3B901, OC3U3B902, OC3U3B903 daily from January 16, 2004 through January 29, 2004.
 Self Report? NO Classification: Minor
 Citation: 30 TAC Chapter 115, SubChapter D 115.354(2)(C) 40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.168(d)(4)
 Description: Failure to monitor an accessible valve in August 2004.
 Self Report? NO Classification: Minor
 Citation: 30 TAC Chapter 122, SubChapter B 122.143(4)
 Rqmt Prov: OP Title V Permit O-02207, SC 13
 Description: Failure to perform monthly inspection of a solvent cleaning station in October 2004.
 Self Report? NO Classification: Moderate
 Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
 Rqmt Prov: PERMIT NSR Permit 3434, SC 1
 Description: **Failure to meet the emission specifications for HCl, Cl2, SO2, and CO from EPNs OCD3SB901, OCD3SB902, and OCD3SB903.**
 Self Report? NO Classification: Minor
 Citation: 30 TAC Chapter 122, SubChapter C 122.210(a)
 Description: Failure to submit a Title V permit revision application to include EPN B39RX210 in the permit.
 Self Report? NO Classification: Minor
 Citation: 30 TAC Chapter 116, SubChapter G 116.715(a)
 Rqmt Prov: PERMIT NSR Permit 20432, SC 2E
 Description: Failure to equip open-ended lines with a cap or plug.
 Self Report? NO Classification: Minor
 Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
 Rqmt Prov: PERMIT NSR Permit 21512, SC 9E
 Description: Failure to equip open-ended lines with a cap or plug.
 Failure to equip open-ended lines with a cap or plug.

Date: 06/29/2005 (378760)
 Self Report? NO Classification: Moderate
 Citation: 30 TAC Chapter 305, SubChapter F 305.125(1)
 Description: Failure to maintain compliance with the permitted effluent limits.

Date: 07/08/2005 (376056)
 Self Report? NO Classification: Moderate
 Citation: 30 TAC Chapter 116, SubChapter B 116.115(c) 5C THC Chapter 382, SubChapter A 382.085(b)
 Rqmt Prov: PERMIT TCEQ Air Permit No. 19041, SC No. 1
 Description: **Dow had an avoidable emissions event during Incident 51417.**

Date: 07/22/2005 (397876)
 Self Report? NO Classification: Moderate
 Citation: 30 TAC Chapter 335, SubChapter C 335.62 40 CFR Chapter 262, SubChapter I, PT 262, SubPT A 262.11

40 CFR Chapter 262, SubChapter I, PT 262, SubPT A 262.11(a)
40 CFR Chapter 262, SubChapter I, PT 262, SubPT A 262.11(b)
40 CFR Chapter 262, SubChapter I, PT 262, SubPT A 262.11(c)
40 CFR Chapter 262, SubChapter I, PT 262, SubPT A 262.11(c)(1)
40 CFR Chapter 262, SubChapter I, PT 262, SubPT A 262.11(c)(2)
40 CFR Chapter 262, SubChapter I, PT 262, SubPT A 262.11(d)

Description: Complete hazardous waste determination is required.
Self Report? NO Classification: Minor
Citation: 30 TAC Chapter 335, SubChapter A 335.6(c)
Description: NOR update required.
Self Report? NO Classification: Moderate
Citation: 30 TAC Chapter 335, SubChapter O 335.431(c)
40 CFR Chapter 268, SubChapter I, PT 268, SubPT E 268.50(b)
Description: CSA, LDR, one year storage limit exceeded.
Self Report? NO Classification: Moderate
Citation: 30 TAC Chapter 335, SubChapter C 335.69(a)(1)(B)
40 CFR Chapter 262, SubChapter I, PT 262, SubPT C 262.34(a)(1)(ii)
Description: Tank containment should be free of cracks.
Self Report? NO Classification: Moderate
Citation: 30 TAC Chapter 335, SubChapter C 335.69(a)(1)(B)
40 CFR Chapter 262, SubChapter I, PT 262, SubPT C 262.34(a)(1)(ii)
Description: Tank, inspection information should be documented.

Date: 08/08/2005 (396518)
Self Report? NO Classification: Moderate
Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
5C THC Chapter 382, SubChapter A 382.085(b)
Description: **Dow Incident 55412 was avoidable. The incident was not excessive.**

Date: 08/15/2005 (393373)
Self Report? NO Classification: Moderate
Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
5C THC Chapter 382, SubChapter A 382.085(b)
Rqmt Prov: PERMIT TCEQ Air Permit 20775, SP No. 1
Description: **Dow had an avoidable emissions event during Incident 55560.**

Date: 08/15/2005 (398936)
Self Report? NO Classification: Moderate
Citation: 30 TAC Chapter 116, SubChapter B 116.115(b)
5C THC Chapter 382, SubChapter A 382.085(b)
Rqmt Prov: PERMIT 19519 GC No. 8
Description: **Dow had an avoidable emissions event during Incident 59062. Not an excessive event.**

Date: 08/22/2005 (404732)
Self Report? NO Classification: Moderate
Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)
Rqmt Prov: PERMIT 4021, SC 1
OP O-02202, SC 10
Description: **Exceedance of MAER for chlorine for T-307; Permit 4021, SC1**

Self Report? NO Classification: Moderate
Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)
Rqmt Prov: PERMIT 4021, SC 7
OP O-02202, SC 10
Description: Exceedance of the concentration limit for chlorine; Permit 4021, SC 7

Date: 08/26/2005 (403273)

Self Report? NO Classification: Minor
Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)
Rqmt Prov: PERMIT 1472, SC 5
OP O-02220, SC 7
Description: Exceedance of permitted tank fill rate stipulated in Permit 1472, SC 5.
Self Report? NO Classification: Moderate
Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)
Rqmt Prov: PERMIT 1472, SC 1
OP O-02220, SC 7
Description: **Exceedance of the MAER for ammonia for Tank D-330; Permit 1472, SC 1**

Self Report? NO Classification: Minor
Citation: 30 TAC Chapter 122, SubChapter B 122.145(2)(A)
Description: Deviations omitted from 3 semiannual deviation reports
Self Report? NO Classification: Minor
Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)
40 CFR Chapter 60, SubChapter C, PT 60, SubPT A 60.18(c)(2)
Rqmt Prov: PERMIT 1472, SC 8
OP O-02220, SC 1A & SC 7
Description: Operation of Flare A26VEF1 without a flame present; Permit 1472, SC 8

Date: 08/31/2005 (403238)

Self Report? NO Classification: Minor
Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)
40 CFR Chapter 60, SubChapter C, PT 60, SubPT VV 60.482-6(a)(1)
Rqmt Prov: OP FOP O-02221, Special Condition #12
PERMIT NSR Permit #18561, Special Condition 6E
Description: Dow failed to maintain caps and/or plugs on two open-ended lines in the B1300 Poly Glycol Methyldiethanolamines (MDEA) and Aminoethylethanolamines (AEEA) Plants for components.
Self Report? NO Classification: Minor
Citation: 30 TAC Chapter 101, SubChapter A 101.20(1)
30 TAC Chapter 115, SubChapter D 115.354(2)
30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)
40 CFR Chapter 60, SubChapter C, PT 60, SubPT VV 60.482-7(a)
Rqmt Prov: OP FOP O-02221, Special Condition 12
PERMIT NSR Permit #18561, Special Condition 6F
PERMIT NSR Permit 18561, Spec. Conds. 6E and 6K
Description: Dow failed to fugitive emission monitor fifty-nine (59) components, 16 valves and 43 connectors.

Self Report? NO Classification: Minor
Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)
Rqmt Prov: OP FOP O-02221, Special Condition 12
PERMIT NSR Permit 18561, Special Condition 17
Description: Dow failed to maintain the minimum scrubber water flow rate for the SC-2 Kettle
Scrubber (EPN B13SV3).

Self Report? NO Classification: Minor
Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)
Rqmt Prov: OP FOP O-02221, Special Condition 12
PERMIT NSR Permit 18561, Special Condition 17
Description: Dow failed to maintain the minimum scrubber water flow rate for the SC-2
Scrubber (EPN B13SV2).

Self Report? NO Classification: Minor
Citation: 30 TAC Chapter 101, SubChapter A 101.20(2)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT PPP 63.1438(f)
Description: Dow failed to maintain a daily average scrubber water flow for the SC-2 Kettle
Scrubber (EPN B13SV3).

Date: 09/30/2005 (575543)

Self Report? YES Classification: Moderate
Citation: 30 TAC Chapter 305, SubChapter F 305.125(1)
TWC Chapter 26 26.121(a)
Description: Failure to meet the limit for one or more permit parameter

Date: 10/31/2005 (575545)

Self Report? YES Classification: Moderate
Citation: 30 TAC Chapter 305, SubChapter F 305.125(1)
TWC Chapter 26 26.121(a)
Description: Failure to meet the limit for one or more permit parameter

Date: 01/17/2006 (593182)

Self Report? NO Classification: Moderate
Citation: 30 TAC Chapter 305, SubChapter F 305.125(1)
30 TAC Chapter 305, SubChapter F 305.125(17)
Description: NON-RPT VIOS FOR MONIT PER OR PIPE

Date: 03/02/2006 (431805)

Self Report? NO Classification: Minor
Citation: 30 TAC Chapter 115, SubChapter B 115.126(1)(A)(i)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT U 63.506(d)
Description: Failure to store required data from November 1, 2004 to November 3, 2004.

Self Report? NO Classification: Major
Citation: 30 TAC Chapter 116, SubChapter B 116.115(b)(2)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.167(a)(1)
Rqmt Prov: PERMIT # 3320, General Provision 7 E
Description: Failure to maintain a plug on an open ended line.

Date: 03/27/2006 (374721)

Self Report? NO Classification: Moderate

Citation: 30 TAC Chapter 101, SubChapter A 101.20(1)
 30 TAC Chapter 101, SubChapter F 101.221(a)
 30 TAC Chapter 116, SubChapter B 116.115(c)
 40 CFR Chapter 60, SubChapter C, PT 60, SubPT A 60.18(c)
 5C THC Chapter 382, SubChapter A 382.085(b)
 Rqmt Prov: PERMIT TCEQ Air Permit 22072 - SC 4
 Description: During Dow Inc. No. 80470 Dow sent emissions to an unlit flare.
 Self Report? NO Classification: Moderate
 Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
 5C THC Chapter 382, SubChapter A 382.085(b)
 Rqmt Prov: PERMIT TCEQ Air Permit 22072 - SC 1
 Description: **During Dow Inc No. 92568 Dow did not determine the status of the salt dome prior to drilling.**
 Self Report? NO Classification: Moderate
 Citation: 30 TAC Chapter 101, SubChapter A 101.20(1)
 30 TAC Chapter 101, SubChapter F 101.221(a)
 30 TAC Chapter 116, SubChapter G 116.715(a)
 40 CFR Chapter 60, SubChapter C, PT 60, SubPT A 60.18(c)(2)
 5C THC Chapter 382, SubChapter A 382.085(b)
 Rqmt Prov: PERMIT Flexible Air Permit 20432 SC III-1 & -21
 Description: During Dow Incident 92771 the flame of the flare was not present.
 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 Flexible Air Permit 20432 SC III-1
 Description: During Dow Incident 94567 (Inv 374721) a valve was inadvertently opened.
 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 Flexible Air Permit 20432 SC III-1
 Description: **Incident 51360 at Dow was an avoidable emissions event.**
 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 Flexible Air Permit 20432 SC III-1
 Description: Dow had an avoidable emissions event during Incident 94909.
 Self Report? NO Classification: Moderate
 Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
 5C THC Chapter 382, SubChapter A 382.085(b)
 Rqmt Prov: PERMIT Permit 48813 - SC 1
 Description: During Incidents 84700, 84701, and 93405 Dow had avoidable emissions events
 Self Report? NO Classification: Moderate
 Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
 5C THC Chapter 382, SubChapter A 382.085(b)
 Rqmt Prov: PERMIT 48813 Special Condition 1
 Description: During Recordable Incident 95308, Dow had an avoidable emissions event.
 Self Report? NO Classification: Moderate
 Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
 5C THC Chapter 382, SubChapter A 382.085(b)
 Rqmt Prov: PERMIT 48813 SC 1
 Description: Dow had an avoidable emissions event during recordable Incident 90045.
 Self Report? NO Classification: Moderate
 Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
 5C THC Chapter 382, SubChapter A 382.085(b)
 Rqmt Prov: PERMIT 48813 Special Condition 1

Description: Dow had an avoidable emissions event during recordable Incident 101031.
 Self Report? NO Classification: Moderate
 Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
 5C THC Chapter 382, SubChapter A 382.085(b)
 Rqmt Prov: PERMIT 834 Special Condition 1

Description: Incident 83616 at Dow was avoidable.
 Self Report? NO Classification: Moderate
 Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
 5C THC Chapter 382, SubChapter A 382.085(b)
 Rqmt Prov: PERMIT 834 Special Condition 1

Description: Dow Incident 88672 was an avoidable emissions event.
 Self Report? NO Classification: Moderate
 Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
 5C THC Chapter 382, SubChapter A 382.085(b)
 Rqmt Prov: PERMIT 834 Special Condition 1

Description: Dow Incident 89747 was an avoidable emissions event.
 Self Report? NO Classification: Moderate
 Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
 5C THC Chapter 382, SubChapter A 382.085(b)
 Rqmt Prov: PERMIT 834 Special Condition 1

Description: Dow Incident 93432 was an avoidable incident.
 Self Report? NO Classification: Moderate
 Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
 5C THC Chapter 382, SubChapter A 382.085(b)
 Rqmt Prov: PERMIT 834 Special Condition 1

Description: Dow Incident 93975 was an avoidable emissions event.
 Self Report? NO Classification: Moderate
 Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
 5C THC Chapter 382, SubChapter A 382.085(b)
 Rqmt Prov: PERMIT 834 Special Condition 1

Description: Dow Incident 95602 was an avoidable emissions event.
 Self Report? NO Classification: Moderate
 Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
 5C THC Chapter 382, SubChapter A 382.085(b)
 Rqmt Prov: PERMIT 834 Special Condition 1

Description: Dow Incident 97687 was an avoidable emissions event.
 Self Report? NO Classification: Minor
 Citation: 30 TAC Chapter 101, SubChapter A 101.20(2)
 30 TAC Chapter 115, SubChapter D 115.352(4)
 30 TAC Chapter 115, SubChapter H 115.783(5)
 30 TAC Chapter 116, SubChapter B 116.115(c)
 40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.167(a)(1)

Description: Failure to equip each open-ended valve or line with a cap, blind flange, plug, or second valve. Two valves at Furnace F-7 with monitoring tag Nos 193757 and 197365 were observed with open-ended lines during the on-site investigation.
 Self Report? NO Classification: Minor
 Citation: 30 TAC Chapter 115, SubChapter D 115.352(4)
 30 TAC Chapter 115, SubChapter H 115.783(5)
 30 TAC Chapter 116, SubChapter B 116.115(c)

Description: Failure to equip each open-ended valve or line with a cap, blind flange, plug, or second valve. An open ended line in HRVOC service at the R102/S102 bay wall area was observed during the on-site investigation.
 Self Report? NO Classification: Minor

Citation: 30 TAC Chapter 115, SubChapter D 115.352(4)
30 TAC Chapter 115, SubChapter H 115.783(5)
30 TAC Chapter 116, SubChapter B 116.115(c)

Description: Failure to equip each open-ended valve or line with a cap, blind flange, plug, or second valve. An open ended line in HRVOC service at the R102/S102 bay wall area was observed during the on-site investigation.

Self Report? NO Classification: Moderate

Citation: 30 TAC Chapter 101, SubChapter A 101.20(2)
30 TAC Chapter 115, SubChapter D 115.354
30 TAC Chapter 115, SubChapter H 115.781(b)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.168(a)

Description: Failure to demonstrate that each applicable HRVOC valve in the process unit was monitored in accordance with the requirements described in 30 TAC § 115.354, as directed by 30 TAC § 115.781(b).

Failure to demonstrate that each applicable HRVOC valve in the process unit was monitored in accordance with the requirement

Self Report? NO Classification: Moderate

Citation: 30 TAC Chapter 115, SubChapter D 115.354
30 TAC Chapter 115, SubChapter H 115.781(b)

Description: Failure to demonstrate that at least ten unmarked valves in HRVOC service were complying with the monitoring requirements described in the applicable sections

of 30 TAC " 115.354 and 115.781(b). Ten unmarked valves in HRVOC service were subsequently numbered in the field with monitoring program identification numbers

Date: 04/18/2006 (433179)

Self Report? NO Classification: Moderate

Citation: 30 TAC Chapter 101, SubChapter F 101.201(a)(1)(B)
30 TAC Chapter 101, SubChapter F 101.201(b)
30 TAC Chapter 116, SubChapter B 116.115(c)
5C THC Chapter 382, SubChapter A 382.085(b)

Rqmt Prov: PERMIT TCEQ Air Permit 2008, SC1

Description: Failure to notify and report in a timely manner following a reportable emissions event (Incident No. 64153).

Date: 04/20/2006 (459137)

Self Report? NO Classification: Moderate

Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 117, SubChapter B 117.206(e)(2)
5C THC Chapter 382, SubChapter D 382.085(b)

Rqmt Prov: PERMIT Permit 46306, Special Condition 7(C)

Description: **Exceeded permitted limits of ammonia (NH3). Violation of Permit # 46306 Special Condition 7(C), 30 TAC 117.206 (e)(2), 30 TAC 116.115 (c), and 5 THC Chapter 382.085(b).**

Date: 04/26/2006 (433177)

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 Air Permit No. 2008, SC 1

Description: **Failure to provide a backup dumpster resulting in unauthorized emissions.(**

Incident No. 64154)

Self Report? NO Classification: Minor
Citation: 30 TAC Chapter 101, SubChapter F 101.201(a)(1)(A)
Description: Dow did not report in a timely manner during Incident 64154.

Date: 06/22/2006 (458889)

Self Report? NO Classification: Moderate
Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)
5C THC Chapter 382, SubChapter A 382.085(b)
Rqmt Prov: PERMIT NSR 20432, SC III-5
OP Title V O-02213, SC 16

Description: Dow failed to meet the NOx emissions hourly standard of 0.1 lb/MMBtu 87 times, and the CO emissions hourly standard of 0.034 lb/MMBtu 276 times from Pyrolysis Furnace Nos. 1 through 7 (OC6L8H1~7) as required by NSR Permit 20432, Special Condition (SC) III-5.

Self Report? NO Classification: Moderate
Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)
5C THC Chapter 382, SubChapter A 382.085(b)
Rqmt Prov: PERMIT NSR 20432, SC III-6
OP Title V O-02213, SC 16

Description: Dow failed to meet the NOx emissions hourly standard of 0.06 lb/MMBtu 301 times, and the CO emissions hourly standard of 0.015 lb/MMBtu 47 times from Pyrolysis Furnace Nos. 8 and 10 (OC6L8H8&10) as required by NSR Permit 20432, SC III-6.

Self Report? NO Classification: Minor
Citation: 30 TAC Chapter 115, SubChapter D 115.352(4)
30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)
5C THC Chapter 382, SubChapter A 382.085(b)
Rqmt Prov: PERMIT NSR 20432, SC 1E
OP Title V O-02213, SC IA and 16

Description: Dow failed to equip open-ended lines with a valve or plug on 23 occasions.

Self Report? NO Classification: Moderate
Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)
5C THC Chapter 382, SubChapter A 382.085(b)
Rqmt Prov: PERMIT NSR 20432, SC III-1
OP Title V O-02213, SC 16

Description: **Dow failed to meet the permit allowables 4 times for NOx and 2 times for CO from Gas Turbine GT-30 (B72L7GT30).**

Self Report? NO Classification: Minor
Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)
5C THC Chapter 382, SubChapter A 382.085(b)
Rqmt Prov: PERMIT NSR 20432, SC 4
OP Title V O-02213, SC 16

Description: Dow failed to meet the specified requirement of 300 BTU/SCF for the Flare B60L7F1 on November 15, 2004.

Self Report? NO Classification: Minor
Citation: 30 TAC Chapter 122, SubChapter B 122.143(4)
40 CFR Chapter 61, SubChapter C, PT 61, SubPT FF 61.354(a)(2)
5C THC Chapter 382, SubChapter A 382.085(b)

Rqmt Prov: OP Title V O-02213, SC 1A
Description: that Dow failed to record daily review of the operating parameters for 8 days as required by 40 CFR 61.354(a)(2).

Self Report? NO Classification: Minor
Citation: 30 TAC Chapter 122, SubChapter B 122.143(4)
5C THC Chapter 382, SubChapter A 382.085(b)

Rqmt Prov: OP Title V O-02213, SC 15
Description: Dow failed to collect flare pilot monitoring data for the Flares FS-1 and FX-1000 (OC6L8F1, and OC6L8F1000) on four occasions, and failed for the Flare B71S2F1 on three occasions.

Self Report? NO Classification: Moderate
Citation: 30 TAC Chapter 122, SubChapter B 122.143(4)
40 CFR Chapter 60, SubChapter C, PT 60, SubPT RRR 60.702(a)
5C THC Chapter 382, SubChapter A 382.085(b)

Rqmt Prov: OP Title V O-02213, SC 1A
Description: Dow failed to route off gas from the processes subject to 40 CFR 60 Subpart RRR to its primary control device Furnaces OC6L8S1 thru OC6L8S10. The off gas was routed to the Flares OC6L8F1000 and OC6L8F1 on nineteen occasions.

Self Report? NO Classification: Minor
Citation: 30 TAC Chapter 122, SubChapter B 122.143(4)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT A 63.6(e)
5C THC Chapter 382, SubChapter A 382.085(b)

Rqmt Prov: OP Title V O-02213, SC 10C
Description: Dow failed to follow precisely the written startup, shutdown, and malfunction plan on three occurrences.

Self Report? NO Classification: Minor
Citation: 30 TAC Chapter 122, SubChapter B 122.143(4)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT A 63.6(e)
5C THC Chapter 382, SubChapter A 382.085(b)

Rqmt Prov: OP Title V O-02213, SC 10C
Description: Dow failed to update the written startup, shutdown, and malfunction plan as required.

Self Report? NO Classification: Minor
Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)
40 CFR Chapter 61, SubChapter C, PT 61, SubPT V 61.242-7(a)
5C THC Chapter 382, SubChapter A 382.085(b)

Rqmt Prov: PERMIT NSR 20432, SC III-3B
OP Title V O-02213, SC 1A and 16
Description: Dow failed to monitor nine valves on six monthly monitoring activities during the period of April 19, 2004 through September 15, 2004.

Self Report? NO Classification: Minor
Citation: 30 TAC Chapter 122, SubChapter B 122.143(4)
5C THC Chapter 382, SubChapter A 382.085(b)

Rqmt Prov: OP Title V O-02213, SC 3B(iii)
Description: Dow failed to keep records of visible emissions observations for ten furnaces, one thermal oxidizer and one decoke vent during the 3rd quarter of 2004.

Self Report? NO Classification: Minor
Citation: 30 TAC Chapter 115, SubChapter B 115.132(a)(1)
30 TAC Chapter 122, SubChapter B 122.143(4)
5C THC Chapter 382, SubChapter A 382.085(b)

Rqmt Prov: OP Title V O-02213, SC 1A
Description: Dow failed to maintain the compartment totally enclosed and have all openings sealed for the Water Separator OC6L8D27 as one leaking connector was noted

between October 14, 2004 and October 19, 2004.

Self Report? NO Classification: Minor
Citation: 30 TAC Chapter 115, SubChapter D 115.352(4)
30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)
40 CFR Chapter 60, SubChapter C, PT 60, SubPT VV 60.482-6(a)(2)
40 CFR Chapter 61, SubChapter C, PT 61, SubPT V 61.242-6(a)(2)
5C THC Chapter 382, SubChapter A 382.085(b)

Rqmt Prov: PERMIT NSR 20432, SC 1E
OP Title V O-02213, SC 1A and 16

Description: Dow failed to equip open-ended lines with a valve or plug on four occasions.

Self Report? NO Classification: Moderate
Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)
40 CFR Chapter 60, SubChapter C, PT 60, SubPT VV 60.482-7(c)
40 CFR Chapter 61, SubChapter C, PT 61, SubPT V 61.242-7(c)
5C THC Chapter 382, SubChapter A 382.085(b)

Rqmt Prov: PERMIT NSR 20432, SC 1F
OP Title V O-02213, SC 1A and 16

Description: Dow failed to monitor 97 valves and 8 flanges on two quarterly monitoring activities during the period of April 19, 2004 through October 18, 2004.

Self Report? NO Classification: Minor
Citation: 30 TAC Chapter 122, SubChapter B 122.143(4)
40 CFR Chapter 61, SubChapter C, PT 61, SubPT FF 61.343(a)(1)(i)(A)
40 CFR Chapter 61, SubChapter C, PT 61, SubPT FF 61.347(a)(1)(i)(A)
5C THC Chapter 382, SubChapter A 382.085(b)

Rqmt Prov: OP Title V O-02213, SC 1A

Description: Dow failed to perform annual fugitive monitoring of components of the benzene waste management units on an annual basis.

Self Report? NO Classification: Minor
Citation: 30 TAC Chapter 122, SubChapter B 122.143(4)
40 CFR Chapter 61, SubChapter C, PT 61, SubPT FF 61.354(a)(2)
5C THC Chapter 382, SubChapter A 382.085(b)

Rqmt Prov: OP Title V O-02213, SC 1A

Description: Dow failed to inspect daily the operating parameters for benzene waste operations for 20 days to ensure proper operations.

Self Report? NO Classification: Minor
Citation: 30 TAC Chapter 122, SubChapter B 122.143(4)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.163(b)(3)
5C THC Chapter 382, SubChapter A 382.085(b)

Rqmt Prov: OP Title V O-02213, SC 1A

Description: Dow failed to perform one weekly visual inspection of pumps as required.

Self Report? NO Classification: Minor
Citation: 30 TAC Chapter 122, SubChapter B 122.143(4)
40 CFR Chapter 60, SubChapter C, PT 60, SubPT VV 60.482-2(a)(2)
5C THC Chapter 382, SubChapter A 382.085(b)

Rqmt Prov: OP Title V O-02213, SC 1A

Description: Dow failed to perform 13 weekly visual inspections of pumps as required.

Self Report? NO Classification: Minor
Citation: 30 TAC Chapter 115, SubChapter D 115.354(3)
30 TAC Chapter 122, SubChapter B 122.143(4)
5C THC Chapter 382, SubChapter A 382.085(b)

Rqmt Prov: OP Title V O-02213, SC 1A

Description: Dow failed to perform nine weekly visual inspections of flanges as required.

Self Report? NO Classification: Minor

Citation: 30 TAC Chapter 115, SubChapter D 115.352(4)
30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)
5C THC Chapter 382, SubChapter A 382.085(b)
Rqmt Prov: PERMIT NSR 21596, SC 11E
OP Title V O-02213, SC 1A and 16
Description: Dow failed to equip open-ended lines with a valve or plug on 10 occasions.

Self Report? NO Classification: Minor
Citation: 30 TAC Chapter 122, SubChapter B 122.143(4)
40 CFR Chapter 61, SubChapter C, PT 61, SubPT FF 61.354(f)(1)
5C THC Chapter 382, SubChapter A 382.085(b)
Rqmt Prov: ORDER Title V O-02213, SC 1A
Description: Dow failed to perform monthly visual car-seal inspections on Benzene Waste Management Units' closed vent system in September and October of 2004.

Self Report? NO Classification: Minor
Citation: 30 TAC Chapter 111, SubChapter A 111.111(a)(4)(A)(ii)
30 TAC Chapter 122, SubChapter B 122.143(4)
5C THC Chapter 382, SubChapter A 382.085(b)
Rqmt Prov: OP Title V O-02213, SC 1A
Description: Dow failed to perform eight daily visual flare observations as required.

Date: 07/14/2006 (457318)

Self Report? NO Classification: Minor
Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)
5C THC Chapter 382, SubChapter A 382.085(b)
Rqmt Prov: PERMIT NSR 654, SC 4
OP Title V O-02203, SC 14
Description: Dow failed to install a pressure gauge or its equivalent between the rupture disk and the pressure safety valve on T-4 Tower.

Self Report? NO Classification: Minor
Citation: 30 TAC Chapter 115, SubChapter D 115.352(4)
30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.167(a)(1)
5C THC Chapter 382, SubChapter A 382.085(b)
Rqmt Prov: PERMIT NSR 654, SC 10E
OP Title V O-02203, SC 1A and 14
Description: Dow failed to equip open-ended lines with plugs/caps on two occasions.

Date: 07/18/2006 (462748)

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 Special Condition 7(c)
Description: **Failure to meet permitted ammonia emission standard.**

Date: 07/18/2006 (462746)

Self Report? NO Classification: Moderate
Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
5C THC Chapter 382, SubChapter D 382.085(b)

Description: **Ammonia limit excedence. Violation of permit #46306 SC 7, 30 TAC 116.115(c), and 5 THC Chapter 382.085(b).**

Date: 07/21/2006 (457258)

Self Report? NO Classification: Minor

Citation: 30 TAC Chapter 115, SubChapter D 115.352(4)
30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)
5C THC Chapter 382, SubChapter D 382.085(b)

Rqmt Prov: PERMIT 18561, SC 6E
OP O-02221, STC 12
OP O-02221, STC 1A

Description: Failure to cap or plug the Twelve (12) open-ended lines in VOC service in Specialty Chemicals 2 Unit.

Self Report? NO Classification: Minor

Citation: 30 TAC Chapter 116, SubChapter B 116.110(a)(4)
30 TAC Chapter 122, SubChapter C 122.222(k)(3)
5C THC Chapter 382, SubChapter D 382.085(b)

Description: **Failure to register the PBRs 106.261 and 106.262 within 10 days of increase in VOC emissions of 0.79 lbs/hr and 0.85 tons per year as a result of production of new line of products and failed to submit off-permit notification concurrently.**

Self Report? NO Classification: Minor

Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)
5C THC Chapter 382, SubChapter D 382.085(b)

Rqmt Prov: PERMIT 18561, SC 17
OP O-02221, STC 12

Description: Failure to maintain minimum flow rate of 10 gallons per minute (gpm) of water as required by NSR permit 18561, Special Condition 17 for the SC-2 kettle scrubber (EPN B13SV3).

Date: 08/11/2006 (457284)

Self Report? NO Classification: Minor

Citation: 30 TAC Chapter 117, SubChapter B 117.216(a)(5)
30 TAC Chapter 122, SubChapter B 122.143(4)
5C THC Chapter 382, SubChapter A 382.085(b)

Rqmt Prov: OP Title V O-02216, SC 6C

Description: Dow failed to include the specific rule citation for any unit with a claimed exemption from the emission specification of §117.206 in the final NOx control report submitted on March 31, 2005.

Self Report? NO Classification: Minor

Citation: 30 TAC Chapter 115, SubChapter D 115.352(4)
30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.167(a)(1)
5C THC Chapter 382, SubChapter A 382.085(b)

Rqmt Prov: PERMIT NSR 20525, SC 15E
PERMIT NSR 46429, SC 12E
PERMIT NSR 46431, SC 13E
OP Title V O-02216, SC 1A and 15

Description: Dow failed to equip open-ended lines in hazardous air pollutant (HAP) with plugs/caps on fourteen occasions.

Self Report? NO Classification: Minor
 Citation: 30 TAC Chapter 115, SubChapter D 115.354(3)
 30 TAC Chapter 116, SubChapter B 116.115(c)
 30 TAC Chapter 122, SubChapter B 122.143(4)
 40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.163(b)(3)
 5C THC Chapter 382, SubChapter A 382.085(b)
 Rqmt Prov: PERMIT NSR 46431, SC 13E

 Description: OP Title V O-02216, SC 1A and 15
 Dow failed to conduct one weekly fugitive inspection by visual, audible, and/or olfactory means.

Self Report? NO Classification: Minor
 Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
 30 TAC Chapter 122, SubChapter B 122.143(4)
 5C THC Chapter 382, SubChapter A 382.085(b)
 Rqmt Prov: PERMIT NSR Permit 46431, SC 21
 OP Title V Permit O-02216, SC 15

 Description: Dow failed to conduct daily analysis on the selective catalytic reduction (SCR) unit on four occasions.

Self Report? NO Classification: Minor
 Citation: 30 TAC Chapter 117, SubChapter B 117.211(a)(4)
 30 TAC Chapter 122, SubChapter B 122.143(4)
 5C THC Chapter 382, SubChapter A 382.085(b)
 Rqmt Prov: OP Title V O-02216, SC 1A

 Description: Dow failed to conduct stack sampling on the furnace exhaust stack (EPN A36S621) within 60 days of startup of the emissions control.

Self Report? NO Classification: Minor
 Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
 30 TAC Chapter 122, SubChapter B 122.143(4)
 5C THC Chapter 382, SubChapter A 382.085(b)
 Rqmt Prov: PERMIT NSR Permit 46431, SC 17
 OP Title V Permit O-02216, SC 15

 Description: Dow failed to maintain the pH in the scrubber (EPN A36S531) at 7.5 or greater on two occasions.

Self Report? NO Classification: Minor
 Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
 30 TAC Chapter 122, SubChapter B 122.143(4)
 40 CFR Chapter 63, SubChapter C, PT 63, SubPT A 63.7(a)(2)
 5C THC Chapter 382, SubChapter A 382.085(b)
 Rqmt Prov: PERMIT NSR Permit 46431, SC 12C
 OP Title V Permit O-02216, SC 10D and 15

 Description: Dow failed to conduct performance test on the thermal treatment unit (TTU) and the tail scrubber (EPN A36S531) within 180 days as required by 40 CFR 63.7(a)(2) and 63.116(c), and as required by NSR Permit 46431, SC 12C.

Self Report? NO Classification: Minor
 Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
 30 TAC Chapter 122, SubChapter B 122.143(4)
 5C THC Chapter 382, SubChapter A 382.085(b)
 Rqmt Prov: PERMIT NSR Permit 46431, SC 22A
 OP Title V Permit O-02216, SC 15

 Description: Dow failed to monitor the carbon bed during unloading operation for the tank (EPN A40S741).

Self Report? NO Classification: Minor
 Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)

30 TAC Chapter 122, SubChapter B 122.143(4)
 5C THC Chapter 382, SubChapter A 382.085(b)
 Rqmt Prov: PERMIT NSR Permit 2008, SC 1
 OP Title V Permit O-02216, SC 15

Description: **NOx, CO, SO2 emissions in lb/hr from the flare (EPN B4F19A) exceeded the allowables specified in the Maximum Allowable Emission Rate Table for NSR Permit 2008 during a period from January 10, 2005 through March 13, 2005.**

Self Report? NO Classification: Minor
 Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
 30 TAC Chapter 122, SubChapter B 122.143(4)
 5C THC Chapter 382, SubChapter A 382.085(b)

Rqmt Prov: PERMIT NSR Permit 2008, SC 9
 OP Title V Permit O-02216, SC 15

Description: Dow failed to maintain the minimum requirement of 300 BTU/scf for the flare (EPN B4F19A) during a period from January 10, 2005 through June 10, 2005.

Self Report? NO Classification: Minor
 Citation: 30 TAC Chapter 115, SubChapter D 115.352(4)
 30 TAC Chapter 116, SubChapter B 116.115(c)
 30 TAC Chapter 122, SubChapter B 122.143(4)
 5C THC Chapter 382, SubChapter A 382.085(b)

Rqmt Prov: PERMIT NSR Permit 2008, SC 14E
 OP Title V Permit O-02216, SC 1A and 15

Description: Dow failed to equip one open-ended line in VOC service with a cap or plug.

Self Report? NO Classification: Minor
 Citation: 30 TAC Chapter 115, SubChapter B 115.112(a)(1)
 30 TAC Chapter 122, SubChapter B 122.143(4)
 5C THC Chapter 382, SubChapter A 382.085(b)

Rqmt Prov: OP Title V Permit O-02216, SC 1A and 14

Description: Dow failed to maintain pilots for the flare (EPNA36MDF532), which was used as a control device for tank vents V-103 and V-534 at the time the pilots went out on September 19, 2005.

Self Report? NO Classification: Minor
 Citation: 30 TAC Chapter 122, SubChapter B 122.143(4)
 5C THC Chapter 382, SubChapter A 382.085(b)

Rqmt Prov: OP Title V Permit O-02216, SC 14

Description: Dow failed to keep two monthly inspection records for the degreaser (A36MDSC1).

Self Report? NO Classification: Moderate
 Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
 30 TAC Chapter 122, SubChapter B 122.143(4)
 40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.168(d)(2)
 5C THC Chapter 382, SubChapter A 382.085(b)

Rqmt Prov: PERMIT NSR Permit 46431, SC 13F
 OP Title V Permit O-02216, SC 1A and 15

Description: Dow failed to monitor 107 valves during the first and second quarters of 2005.

Self Report? NO Classification: Moderate
 Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
 30 TAC Chapter 122, SubChapter B 122.143(4)
 40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.174(b)(2)
 5C THC Chapter 382, SubChapter A 382.085(b)

Rqmt Prov: PERMIT NSR Permit 46431, SC 14A
 OP Title V Permit O-02216, SC 1A and 15

Description: Dow failed to monitor 324 connectors during the first and second quarters of 2005.

Date: 08/18/2006 (465699)

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 TCEA Air Permit No. 21596, SC 1

Description: **Dow had an avoidable emissions event during Incident No. 73674.**

Date: 08/19/2006 (480155)

Self Report? NO

Classification: Minor

Citation: 30 TAC Chapter 113, SubChapter C 113.130
30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.167(a)(1)
5C THC Chapter 382, SubChapter A 382.085(b)

Rqmt Prov: OP FOP# O-02205, Special Condition #10
PA NSR Permit #20774, Special Condition 10E

Description: Failure to cap 6 open-ended valves/lines in HAP service per 63.167(a)(1).

Self Report? NO

Classification: Minor

Citation: 30 TAC Chapter 115, SubChapter D 115.352(4)
30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)
5C THC Chapter 382, SubChapter A 382.085(b)

Rqmt Prov: OP FOP# O-02205, Special Condition #11
OP FOP# O-02205, Special Condition #1A
PA NSR Permit 20774, Special Condition #10E

Description: Failure to cap one open-ended valve or line in general VOC service as required by 115.352(4).

Self Report? NO

Classification: Minor

Citation: 30 TAC Chapter 122, SubChapter B 122.143(4)
5C THC Chapter 382, SubChapter A 382.085(b)

Rqmt Prov: OP FOP# O-02205, Special Condition #9

Description: Failure to limit the outlet gas temperature of PT-110 to 95 degrees fahrenheit during venting operations.

Date: 08/22/2006 (484727)

Self Report? NO

Classification: Moderate

Citation: 30 TAC Chapter 335, SubChapter A 335.9(a)(2)

Rqmt Prov: PERMIT VII.A.1.

Description: Failure to report the burning of Waste Stream 2196219H in Boiler B-901 (NOR 089) on the 2005 Annual Waste Summary.

Date: 08/23/2006 (457315)

Self Report? NO

Classification: Minor

Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)
5C THC Chapter 382, SubChapter A 382.085(b)

Rqmt Prov: PERMIT NSR 20909, SC 5
OP Title V O-02211, SC 14

Description: Dow failed to install pressure indicators for all vent streams from process vessels that are routed to an emissions control device so that the pressure

indicators would indicate positive flows from the vessels to the primary thermal

oxidizer (EPN B35EWS200).
Self Report? NO Classification: Minor
Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)
5C THC Chapter 382, SubChapter A 382.085(b)
Rqmt Prov: PERMIT NSR 20909, SC 8
OP Title V O-02211, SC 14.
Description: Dow failed to operate upset diverter valves and the backup oxidizer start-up automatically when a diversion is needed from the primary thermal oxidizer (EPN B35EWS200) to the backup thermal oxidizer (EPN B34EWS201).

Self Report? NO Classification: Minor
Citation: 30 TAC Chapter 117, SubChapter B 117.216(a)(5)
30 TAC Chapter 122, SubChapter B 122.143(4)
5C THC Chapter 382, SubChapter A 382.085(b)
Rqmt Prov: OP Title V O-02211, SC 6C
Description: Dow failed to include the specific rule citation for any unit with a claimed exemption from the emission specification of §117.206 in the final NOx control report.

Self Report? NO Classification: Minor
Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)
5C THC Chapter 382, SubChapter A 382.085(b)
Rqmt Prov: PERMIT NSR 313, SC 14
OP Title V O-02211, SC 14
Description: Dow failed to record fan amperage readings once every shift.

Self Report? NO Classification: Minor
Citation: 30 TAC Chapter 122, SubChapter B 122.143(4)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT DD 63.697(b)(4)
5C THC Chapter 382, SubChapter A 382.085(b)
Rqmt Prov: OP Title V O-02211, SC 1A
Description: Dow failed to submit the required semiannual report within the time frame allowed.

Self Report? NO Classification: Minor
Citation: 30 TAC Chapter 122, SubChapter B 122.143(4)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT A 63.6(e)
5C THC Chapter 382, SubChapter A 382.085(b)
Rqmt Prov: OP Title V O-02211, SC 11C
Description: Dow failed to follow malfunction procedure as it was written during a malfunction of a flow meter.

Self Report? NO Classification: Minor
Citation: 30 TAC Chapter 117, SubChapter B 117.219(d)
30 TAC Chapter 122, SubChapter B 122.143(4)
5C THC Chapter 382, SubChapter A 382.085(b)
Rqmt Prov: OP Title V O-02211, SC 1A
Description: Dow failed to submit the required semiannual report within the time frame allowed.

Date: 08/23/2006 (457302)

Self Report? NO Classification: Minor
Citation: 30 TAC Chapter 106, SubChapter A 106.6(b)
30 TAC Chapter 122, SubChapter B 122.143(4)
5C THC Chapter 382, SubChapter A 382.085(b)
Rqmt Prov: OP Title V O-02218, SC 6

Description: Dow failed to equip 23 open-ended lines with caps or plugs as fugitive emissions were represented and authorized through Permit by Rule (PBR) 106.262.
Self Report? NO Classification: Minor
Citation: 30 TAC Chapter 106, SubChapter K 106.262(3)
30 TAC Chapter 122, SubChapter B 122.143(4)
5C THC Chapter 382, SubChapter A 382.085(b)
Rqmt Prov: OP Title V O-02218, SC 6
Description: **Dow failed to provide notification using Form PI-7 within ten days following the modification of the facility.**

Date: 08/23/2006 (484737)

Self Report? NO Classification: Moderate
Citation: 30 TAC Chapter 335, SubChapter F 335.152(a)(18)
40 CFR Chapter 264, SubChapter I, PT 264, SubPT BB 264.1052(e)
Rqmt Prov: PERMIT VI.A.21.a.

Description: Failure to conduct annual monitoring for fugitive emissions from Pump MP-506.

Self Report? NO Classification: Moderate
Citation: 30 TAC Chapter 335, SubChapter F 335.152(a)(18)
40 CFR Chapter 264, SubChapter I, PT 264, SubPT BB 264.1061(b)(2)

Rqmt Prov: PERMIT VI.A.21.a.

Description: Failure to provide the notification and perform annual monitoring of valves in light liquid service.

Date: 08/28/2006 (497117)

Self Report? NO Classification: Minor

Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.167(a)(1)
5C THC Chapter 382, SubChapter A 382.085(b)

Rqmt Prov: OP FOP #O-02206, Special Condition #11
OP FOP #O-02206, Special Condition #1A
PA NSR Permit 2773, Special Condition #12E

Description: Failure to cap 53 open-ended valves or lines in HAP service.

Self Report? NO Classification: Minor

Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.168(f)(1)
5C THC Chapter 382, SubChapter D 382.085(b)

Rqmt Prov: OP FOP #O-02006, Special Condition #1A
OP FOP #O-02206, Special Condition #11
PA NSR Permit 2472, Special Condition #9.I
PA NSR Permit 2773, Special Condition #12.I

Description: Failure to perform Method 21 remonitoring to three valves in HAP service within 15 days.

Self Report? NO Classification: Minor

Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)

Rqmt Prov: 40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.163(c)(1)
OP FOP #O-02206, Special Condition #11
OP FOP #O-02206, Special Condition #1A
PA NSR Permit #2472, Special Condition #9.I

Description: Failure to remonitor the P-206 pump seal, after repairs, within 15 days.

Self Report? NO Classification: Minor
Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.174(d)
5C THC Chapter 382, SubChapter A 382.085(b)
Rqmt Prov: OP FOP #O-02006, Special Condition #11
OP FOP #O-02206, Special Condition #1A
PA NSR Permit 2472, Special Condition #9.I
Description: Failure to remonitor four flanges in HAP service, after completion of repairs,
within 15 days.

Date: 08/31/2006 (457309)

Self Report? NO Classification: Moderate
Citation: 30 TAC Chapter 122, SubChapter B 122.143(4)
5C THC Chapter 382, SubChapter D 382.085(b)
Rqmt Prov: OP O-2710, Special Condition 3(B)(iii)
Description: Failure to conduct the visible emissions observations for the units in B6200,
B4300 area during the compliance years 2004 and 2005.

Self Report? NO Classification: Moderate
Citation: 30 TAC Chapter 116, SubChapter G 116.715(a)
30 TAC Chapter 122, SubChapter B 122.143(4)
5C THC Chapter 382, SubChapter D 382.085(b)
Rqmt Prov: PERMIT 20432, Special Condition I-38.c
OP O-02207, Special Condition 14

Description: Failure to conduct the quarterly cylinder gas audit (CGA) analysis of the
continuous emissions monitoring system (CEMS) for the EPN B62CB1.

Self Report? NO Classification: Minor
Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)
5C THC Chapter 382, SubChapter D 382.085(b)
Rqmt Prov: PERMIT 3434, Special Condition 27.B
OP O-02207, Special Condition 14

Description: Failure to maintain the sulfur content of the waste oils burned in the boilers below
50 ppmw.

Self Report? NO Classification: Minor
Citation: 30 TAC Chapter 115, SubChapter D 115.352(4)
30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 116, SubChapter G 116.715(a)
30 TAC Chapter 122, SubChapter B 122.143(4)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.167(a)(1)
5C THC Chapter 382, SubChapter D 382.085(b)

Rqmt Prov: PERMIT 20432, Special Condition 1.E
PERMIT 3434, Special Condition 7.E
OP O-02207, Special Condition 14
OP O-02207, Special Condition 1A

Description: Failure to cap or plug the Eight (8) open-ended lines in VOC service in the
O-02207 Title V permit area.

Self Report? NO Classification: Minor
Citation: 30 TAC Chapter 115, SubChapter D 115.354(2)(B)
30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.163(b)(1)
5C THC Chapter 382, SubChapter D 382.085(b)
Rqmt Prov: PERMIT 3434, Special Condition 7.G
OP O-02207, Special Condition 14

OP O-02207, Special Condition 1A
Description: Failure to monitor nine pumps in VHAP service in the O-02207 Title V permit area.
Self Report? NO Classification: Minor
Citation: 30 TAC Chapter 122, SubChapter B 122.143(4)
30 TAC Chapter 122, SubChapter B 122.145(2)(A)
5C THC Chapter 382, SubChapter D 382.085(b)
Rqmt Prov: OP O-2207, General Terms & Conditions
Description: The RE failed to report some instances of deviations in the deviation report dated November 17, 2005.

Date: 10/12/2006 (515660)
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 Air Permit No. 48813, SC 1
Description: **Dow failed to prevent an operator error resulting in unauthorized emissions during Incident No. 79109.**

Date: 10/25/2006 (509774)
Self Report? NO Classification: Moderate
Citation: 30 TAC Chapter 116, SubChapter B 116.115(b)(2)(F)
5C THC Chapter 382, SubChapter D 382.085(b)
Rqmt Prov: PERMIT TCEQ Air Permit No. 46429 MAERT
Description: **Investigation 509774 determined that Dow failed to communicate with a contractor technician properly to prevent unauthorized emissions during Incident 76828.**

Date: 11/30/2006 (519472)
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. 48813, SC 1
Description: **Investigation No. 519472 determined that Dow had an avoidable emissions event during Incident No. 79942.**

Date: 12/13/2006 (512466)
Self Report? NO Classification: Moderate
Citation: 30 TAC Chapter 106, SubChapter K 106.261(a)(7)(B)
30 TAC Chapter 122, SubChapter B 122.143(4)
5C THC Chapter 382, SubChapter D 382.085(b)
Rqmt Prov: OP O-02212, SC 16.A.
Description: **The Dow Chemical Company, Dow Texas Operations Freeport, failed to submit Form PI-7 on March 31, 2005, for the increase of ethylene and propylene**

emissions to the monitor well flare (BSRSRMW1T). This constitutes a violation of 30 Texas Administrative Code (TAC) § 106.261(a)(7)(B).
Self Report? NO Classification: Moderate
Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)
40 CFR Chapter 60, SubChapter C, PT 60, SubPT A 60.18(c)(3)(ii)
5C THC Chapter 382, SubChapter D 382.085(b)
Rqmt Prov: OP O-02212, SC 16.A.

PERMIT Permit No. 22072, SC 4
Description: the Dow Chemical Company ("Dow"), Dow Texas Operations Freeport, failed to maintain the minimum heat value for Monitor Well Flare no. 1 (unit I.D. BSRSRFMW1) and Brine Flare 2 (unit I.D. BSRF401).

Date: 12/18/2006 (512614)

Self Report? NO Classification: Minor

Citation: 40 CFR Chapter 63, SubChapter C, PT 63, SubPT SS 63.998(b)
5C THC Chapter 382, SubChapter D 382.085(b)

Description: Dow failed to maintain records of daily average pH data for the T-734 Scrubber System (EPN B84S734) on October 5 and 6, 2005.

Self Report? NO Classification: Moderate

Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)
5C THC Chapter 382, SubChapter D 382.085(b)

Rqmt Prov: PERMIT NSR 7531, SC 1
OP Title V O-02210, SC 10

Description: **Dow failed to meet the maximum permit allowable of 0.06 lb/hr for Cl2 from the T-734 Scrubber System (EPN B84S734) on the following dates during performance testing:** 08-18-05 10:33 to 11:15 0.13 lb/hr; 08-29-05 11:23 to 12:14 0.38 lb/hr; 08-30-05 10:52 to 17:04 1.63 lb/hr; 10/12/05 9:43 to 13:23 0.1 lb/hr

Self Report? NO Classification: Minor

Citation: 30 TAC Chapter 106, SubChapter K 106.262
30 TAC Chapter 122, SubChapter B 122.143(4)
5C THC Chapter 382, SubChapter D 382.085(b)

Rqmt Prov: OP Title V O-02210, SC 10

Description: Dow failed to register a minor process modification made in April 2005 under Permits by Rule (PBR) 106.262(a)(3) within ten days following the modification of the facility.

Date: 01/18/2007 (512465)

Self Report? NO Classification: Moderate

Citation: 30 TAC Chapter 117, SubChapter B 117.206(e)(1)(A)
30 TAC Chapter 122, SubChapter B 122.143(4)
5C THC Chapter 382, SubChapter D 382.085(b)

Rqmt Prov: OP O-02214, SC 15.A.(i)

Description: **The Dow Chemical Company, Dow Texas Operations Freeport exceeded the CO limit of 400 ppmv on Boiler No. 5 (Unit ID no. B664PB5, EPN FB-45). This constitutes a violation of 30 TAC 117.206(e)(1).**

Self Report? NO Classification: Moderate

Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)

Rqmt Prov: 5C THC Chapter 382, SubChapter D 382.085(b)
OP O-02214, SC 9.A.
PERMIT Permit No. 46306, SC 7.C.

Description: The Dow Chemical Company, Dow Texas Operations Freeport exceeded the ammonia limit of 10 ppmvd on boiler FB-93 (EPN: B56SB3). This constitutes a violation of Permit no. 46306, PSD-TX-986, and N-059, Special Condition (SC) 7.C.

Self Report? NO Classification: Moderate

Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)

Rqmt Prov: 5C THC Chapter 382, SubChapter D 382.085(b)
OP O-02214, SC 9.A.
PERMIT Permit No. 46306, SC 1

Description: **The Dow Chemical Company, Dow Texas Operations Freeport exceeded the maximum allowable emission rate for NOx for boiler FB-92 (EPN: B56SB2) on March 3, 2006. This constitutes a violation of Permit no. 46306, PSD-TX-986, and N-059, SC 1.**

Self Report? NO Classification: Moderate
Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)
5C THC Chapter 382, SubChapter D 382.085(b)

Rqmt Prov: OP O-02214, SC 9.A.
PERMIT Permit No. 46306, SC 7.A.

Description: The Dow Chemical Company, Dow Texas Operations Freeport exceeded the lb/mmBtu emission rate for NOx for boilers FB-92 (EPN: B56SB2) and FB-94 (EPN: B56SB4) on March 3, 2006. This constitutes a violation of Permit no. 46306, PSD-TX-986, and N-059, SC 7.A.

Date: 02/16/2007 (532501)

Self Report? NO Classification: Minor
Citation: 30 TAC Chapter 111, SubChapter A 111.111(a)(4)(A)(ii)
30 TAC Chapter 122, SubChapter B 122.143(4)
5C THC Chapter 382, SubChapter D 382.085(b)

Rqmt Prov: OP O-02219, SC 1.A.

Description: Failure to record 188 daily observation of the flare (Unit I.D. B3808F1) beginning February 3, 2006, through September 30, 2006. This constitutes a violation of 30 Texas Administrative Code (TAC) § 111.111(a)(4)(A)(ii).

Self Report? NO Classification: Minor
Citation: 30 TAC Chapter 101, SubChapter F 101.201(b)
30 TAC Chapter 122, SubChapter B 122.143(4)
5C THC Chapter 382, SubChapter D 382.085(b)

Rqmt Prov: OP O-02219, SC 2.F.

Description: Failure to create a final onsite record of emissions events. This constitutes a violation of 30 TAC § 101.201(b).

Self Report? NO Classification: Moderate
Citation: 30 TAC Chapter 122, SubChapter B 122.143(4)
30 TAC Chapter 122, SubChapter B 122.145(2)(A)
5C THC Chapter 382, SubChapter D 382.085(b)

Rqmt Prov: OP O-02219, General Terms and Conditions

Description: Failure to report all incidents of deviations as required by 30 TAC § 122.145(2)(A).

Self Report? NO Classification: Minor
Citation: 30 TAC Chapter 115, SubChapter D 115.352(4)
30 TAC Chapter 122, SubChapter B 122.143(4)
40 CFR Chapter 60, SubChapter C, PT 60, SubPT DDD 60.562-2(a)
40 CFR Chapter 60, SubChapter C, PT 60, SubPT VV 60.482-6(a)(1)

Rqmt Prov: OP O-02219, SC 13.A.
PERMIT Permit No. 20775, SC 7.E.

Description: Failure to maintain secondary enclosures on the following open-ended line tag nos. EAI 128564.2, EAI 80701.2, EAI 80353, and 80701.2.

Self Report? NO Classification: Minor
Citation: 30 TAC Chapter 115, SubChapter H 115.767(1)

30 TAC Chapter 122, SubChapter B 122.143(4)
5C THC Chapter 382, SubChapter D 382.085(b)
Rqmt Prov: OP O-02219, SC 1.I.(iv)
Description: Failure to maintain the pressure between on the cooling water side at a minimum of 5 psig for HRVOC greater than the process fluid side for cooling tower B3831CT1.

Self Report? NO Classification: Minor

Citation: 30 TAC Chapter 115, SubChapter H 115.725(a)
5C THC Chapter 382, SubChapter D 382.085(b)

Description: Failure to test HRVOC vents in the Research Reactor (BX250RX1).

Self Report? NO Classification: Minor

Citation: 30 TAC Chapter 122, SubChapter C 122.217(a)(2)
5C THC Chapter 382, SubChapter D 382.085(b)

Description: Failure to submit an Application for Minor Permit Revisions prior to operating the Research Reactor (B250RX1).

Date: 02/28/2007 (542323)

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 Flex Air Permit No. 20432, SC III-1

Description: **Investigation No. 542323 determined that Dow had an avoidable emissions event during Incident No. 84696.**

Date: 03/27/2007 (542214)

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 Air Permit No. 770, SC 1

Description: **Investigation No. 542214 determined that Dow Incident No. 84425 could have been avoided by good operations practices.**

Date: 03/31/2007 (553947)

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 Air Permit No. 834, SC1

Description: **Investigation No. 553947 determined that Dow Incident No. 85437 was caused by operator error. The incident was avoidable.**

Date: 04/02/2007 (532635)

Self Report? NO Classification: Moderate

Citation: 30 TAC Chapter 116, SubChapter B 116.116(b)(1)
5C THC Chapter 382, SubChapter D 382.085(b)

Description: Site failed to represent volatile organic compound (VOC) emissions from Catalyst Mix Tanks D-10, D-10A, D-11; D-11A, D-12, and D-12A (B77APPT10, B77APPT10A, and B77APPT11, B77APPT11A, B77APPT12, and B77APPT12A) in the permit application for NSR Permit 8567.

Self Report? NO Classification: Minor

Citation: 30 TAC Chapter 101, SubChapter F 101.201(b)
30 TAC Chapter 122, SubChapter B 122.143(4)

Rqmt Prov: 5C THC Chapter 382, SubChapter D 382.085(b)
 OP O-02215, SC 2F
 Description: Site failed to create final records of seven emissions events no later than two weeks after the end of the emissions events.

Self Report? NO Classification: Minor
 Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
 30 TAC Chapter 122, SubChapter B 122.143(4)
 40 CFR Chapter 60, SubChapter C, PT 60, SubPT A 60.18(c)(2)
 40 CFR Chapter 60, SubChapter C, PT 60, SubPT A 60.18(e)
 5C THC Chapter 382, SubChapter D 382.085(b)

Rqmt Prov: PERMIT NSR 8567, SC 6
 OP Title V O-02215, SC 11

Description: Site failed to operate the flare (B78APF1) with a flame present for a total of 21 minutes on February 14, 2006.

Self Report? NO Classification: Moderate
 Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
 30 TAC Chapter 122, SubChapter B 122.143(4)
 5C THC Chapter 382, SubChapter D 382.085(b)

Rqmt Prov: PERMIT NSR 8567, SC 1
 OP Title V O-02215, SC 11

Description: **Site failed to maintain the hourly permitted emission limit of 0.34 lbs/hr of VOC for a tank (B78APST5).**

Self Report? NO Classification: Minor
 Citation: 30 TAC Chapter 115, SubChapter D 115.352(4)
 30 TAC Chapter 115, SubChapter H 115.783(5)
 30 TAC Chapter 116, SubChapter B 116.115(c)
 30 TAC Chapter 122, SubChapter B 122.143(4)
 5C THC Chapter 382, SubChapter D 382.085(b)

Rqmt Prov: PERMIT NSR 6803, SC 9E
 PERMIT NSR 834, SC 9E
 PERMIT NSR 8567, SC 8E
 OP Title V O-02215, SC 11
 OP Title V O-02215, SC 1F(v)

Description: Site failed to equip five open-ended lines with plugs/blinds. The regulated entity also discovered to fail to equip nine open-ended lines with second valves/plugs on the non-threaded drain lines of D-10, D-11, and D-12 on May 11, 2006.

Self Report? NO Classification: Minor
 Citation: 30 TAC Chapter 115, SubChapter H 115.781(c)(1)
 30 TAC Chapter 122, SubChapter B 122.143(4)
 5C THC Chapter 382, SubChapter D 382.085(b)

Rqmt Prov: OP Title V O-02215, SC 1F(v)

Description: Site failed to conduct weekly visual inspections of pumps, compressors, and agitators in highly reactive volatile organic compound (HRVOC) service during the week of January 15, 2006.

Self Report? NO Classification: Moderate
 Citation: 30 TAC Chapter 115, SubChapter H 115.725(a)(1)(C)
 30 TAC Chapter 122, SubChapter B 122.143(4)
 5C THC Chapter 382, SubChapter D 382.085(b)

Rqmt Prov: OP Title V O-02215, SC 1F(ii)

Description: Site failed to operate Train 1 Make Hoppers, MH-101, MH-102 & MH-103, Check Hoppers CH-101A & CH-101B, and Spin Dryer SD-102 within the established operating limits for the selected operating parameters to establish maximum potential HRVOC hourly emission data expected during normal operation for the vent (B25P2RX101).

Self Report? NO Classification: Moderate

Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
 30 TAC Chapter 122, SubChapter B 122.143(4)
 5C THC Chapter 382, SubChapter D 382.085(b)

Rqmt Prov: PERMIT NSR 48813, SC 1
 OP Title V O-02215, SC 11

Description: Site failed to limit the VOC emissions from Train 2 Make Hoppers MH-201, MH-202, and MH-203 (B25P2SB201, B25P2SB202, and B25P2SB203) within the permit allowables of 1.98 lbs/hr from each hopper vent.

Self Report? NO Classification: Moderate

Citation: 30 TAC Chapter 115, SubChapter H 115.725(a)(1)(C)
 30 TAC Chapter 122, SubChapter B 122.143(4)
 5C THC Chapter 382, SubChapter D 382.085(b)

Rqmt Prov: OP Title V O-02215, SC 1F(i)

Description: Site failed to operate Make Hoppers MH-241, MH-243, MH-244 and MH-311 within the established operating limits for the selected operating parameters to establish maximum potential HRVOC hourly emission data expected during normal operation for the vent (B25P2VOGS).

Self Report? NO Classification: Minor

Citation: 30 TAC Chapter 115, SubChapter D 115.352(3)
 30 TAC Chapter 115, SubChapter H 115.782(a)
 30 TAC Chapter 116, SubChapter B 116.115(c)
 30 TAC Chapter 122, SubChapter B 122.143(4)
 5C THC Chapter 382, SubChapter D 382.085(b)

Rqmt Prov: PERMIT NSR 19519, SC 10H
 PERMIT NSR 48813, SC 5H
 PERMIT NSR 6803, SC 9H
 OP Title V O-02215, SC 11

Description: Site failed to place leaker tags on six leaking valves and four leaking connectors.

Self Report? NO Classification: Moderate

Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
 30 TAC Chapter 122, SubChapter B 122.143(4)
 5C THC Chapter 382, SubChapter D 382.085(b)

Rqmt Prov: PERMIT NSR 834, SC 1
 OP Title V O-02215, SC 11

Description: Site failed to limit the VOC emissions from Train 1 Blending Silos RB-1, RB-5, RB-9, and RB-13 (B41P4SB1, B41P4SB5, B41P4SB9, and B41P4SB13) within the permit allowables of 3.11 lbs/hr from each silo vent.

Self Report? NO Classification: Minor

Citation: 30 TAC Chapter 115, SubChapter H 115.722(d)
 30 TAC Chapter 116, SubChapter B 116.115(c)
 30 TAC Chapter 122, SubChapter B 122.143(4)
 40 CFR Chapter 60, SubChapter C, PT 60, SubPT A 60.18(c)(3)(ii)
 5C THC Chapter 382, SubChapter D 382.085(b)

Rqmt Prov: PERMIT NSR 834, SC 3
 PERMIT NSR 8567, SC 6
 OP Title V O-02215, SC 11
 OP Title V O-02215, SC 1F(iii)

Description: Site failed to maintain the minimum net heating value of 300 Btu/scf for the gas being combusting at the flare (B78APF1) on two occasions for a total of two hours on June 2 and 30, 2006.

Self Report? NO Classification: Minor

Citation: 30 TAC Chapter 101, SubChapter F 101.201(a)(1)
 30 TAC Chapter 122, SubChapter B 122.143(4)
 5C THC Chapter 382, SubChapter D 382.085(b)

Rqmt Prov: OP Title V O-02215, SC 2

Description: Site failed to determine an emissions event (Incident # 79942) occurred on August 13, 2006 is a reportable emissions event and failed to notify the commission regional office the reportable event no later than 24 hours after the discovery of the emissions event.

Self Report? NO Classification: Moderate

Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)
5C THC Chapter 382, SubChapter D 382.085(b)

Rqmt Prov: PERMIT NSR 6803, SC 1
OP Title V O-02215, SC 11

Description: Site failed to maintain VOC emissions from the flare (B27P3F1) within the emissions allowable of 10.95 lbs/hr for one hour on September 11, 2006.

Self Report? NO Classification: Moderate

Citation: 30 TAC Chapter 115, SubChapter H 115.725(a)
30 TAC Chapter 122, SubChapter B 122.143(4)
5C THC Chapter 382, SubChapter D 382.085(b)

Rqmt Prov: OP Title V O-02215, SC 1F(i)

Description: Site failed to conduct testing on the Poly 4 hold up hopper vents (B41V1 and B41V2) to establish maximum potential HRVOC hourly emission data by the compliance date of January 30, 2006.

Self Report? NO Classification: Moderate

Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)
5C THC Chapter 382, SubChapter D 382.085(b)

Rqmt Prov: PERMIT NSR 8567, SC 1
OP Title V O-02215, SC 11

Description: Site failed to maintain VOC emissions from Tanks T-10 and T-11 within the

permitted allowables of 0.02 lbs/hr for each of the tanks, and 0.06 tons/yr for T-10 and 0.03 tons/yr for T-11.

Self Report? NO Classification: Minor

Citation: 30 TAC Chapter 122, SubChapter B 122.143(4)
30 TAC Chapter 122, SubChapter B 122.145(2)(A)
5C THC Chapter 382, SubChapter D 382.085(b)

Rqmt Prov: OP Title V O-02215, General Conditions

Description: Site failed to report all instances of deviations in deviation reports.

Date: 04/13/2007 (543310)

Self Report? NO Classification: Moderate

Citation: 30 TAC Chapter 115, SubChapter D 115.352(4)
30 TAC Chapter 122, SubChapter B 122.143(4)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.167(a)(1)
5C THC Chapter 382, SubChapter D 382.085(b)

Rqmt Prov: OP O-02203, SC 14.A.
PERMIT Permit No. 4031, SC 16.E.

Description: Failure to seal an open-ended line (OEL) in organic hazardous air pollutant service (unit ID: B13GBFU3).

Date: 04/27/2007 (532788)

Self Report? NO Classification: Moderate

Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)
5C THC Chapter 382, SubChapter D 382.085(b)

Rqmt Prov: OP FOP O-02217, SC #15
PERMIT TCEQ Air Permit No. 6932, SC #3A

Description: Dow failed to prevent inadequate fuel supply to the flares.

Self Report? NO Classification: Moderate

Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)
5C THC Chapter 382, SubChapter D 382.085(b)

Rqmt Prov: OP FOP O-02217, SC #15
PERMIT TCEQ Air Permit No. 6932, S C #1

Description: **Dow failed to control the release of unauthorized VOCs.**

Self Report? NO Classification: Moderate

Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)
5C THC Chapter 382, SubChapter D 382.085(b)

Rqmt Prov: OP FOP O-02217, SC 15
PERMIT TCEQ Air Permit No. 19720 SC 3

Description: Dow exceeded their annual permitted throughput loading rate.

Date: 06/30/2007 (575538)

Self Report? YES Classification: Moderate

Citation: 30 TAC Chapter 305, SubChapter F 305.125(1)
TWC Chapter 26 26.121(a)

Description: Failure to meet the limit for one or more permit parameter

Date: 07/11/2007 (532793)

Self Report? NO Classification: Moderate

Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)

Rqmt Prov: OP Permit # O-02311, General Terms & Cond.
OP Permit # O-02311, Special Condition #10
PERMIT Permit #20776, Special Condition #5

Description: Failure to prevent the solvent recovery tank system pressure from exceeding 10 psig.

Date: 07/27/2007 (563635)

Self Report? NO Classification: Moderate

Citation: 30 TAC Chapter 335, SubChapter A 335.15(3)(A)

Rqmt Prov: PERMIT Provision IV.A

Description: Failure to notify acceptance of unmanifested wastes within 15 days from the date the wastes were accepted.

Date: 08/06/2007 (568640)

Self Report? NO Classification: Moderate

Citation: 30 TAC Chapter 122, SubChapter B 122.143(4)
30 TAC Chapter 122, SubChapter B 122.145(2)(C)
5C THC Chapter 382, SubChapter A 382.085(b)

Rqmt Prov: OP General Terms and Conditions

Description: Failure to submit a deviation report by the submittal due date.

Date: 08/14/2007 (568679)

Self Report? NO Classification: Moderate

Citation: 30 TAC Chapter 122, SubChapter B 122.143(4)

30 TAC Chapter 122, SubChapter B 122.145(2)(C)
5C THC Chapter 382, SubChapter D 382.085(b)

Rqmt Prov: OP General Terms and Conditions

Description: Failure to submit semiannual deviation report within 30 days of end of deviation reporting period.

Date: 08/31/2007 (512665)

Self Report? NO Classification: Minor

Citation: 30 TAC Chapter 115, SubChapter D 115.352(4)
30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.167(a)(1)
5C THC Chapter 382, SubChapter D 382.085(b)

Rqmt Prov: OP FOP Permit No. O-02206, STC 11
PERMIT NSR Permit No. 2472 SC 9E
PERMIT NSR Permit No. 2773 SC 12 E

Description: Failure to plug 35 open-ended lines.

Self Report? NO Classification: Moderate

Citation: 30 TAC Chapter 122, SubChapter B 122.143(4)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT MMM 63.1366(b)(1)(ii)
5C THC Chapter 382, SubChapter D 382.085(b)

Rqmt Prov: OP FOP No. O-02206 STC 10.
OP FOP No. O-02206 STC 1D

Description: failure to record solvent flow and pH for the units A32TO560, A32STHROX, A32CPST06C&D, and A32CSST284 during February 20, 2006 at 3:03 p.m. through February 21, 2006 till 7:35 a.m.

Self Report? NO Classification: Minor

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

30 TAC Chapter 122, SubChapter B 122.143(4)
5C THC Chapter 382, SubChapter D 382.085(b)

Rqmt Prov: OP FOP O-02206 STC 11
PERMIT NSR Permit No. 770 SC 11

Description: failed to complete annual refresher training for the year 2005.

Self Report? NO Classification: Minor

Citation: 40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.174(b)(2)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.174(b)(3)(i)

Description: failure monitor 29 connectors initially and annually as required from January 16, 2005 through July 15, 2006.

Self Report? NO Classification: Minor

Citation: 30 TAC Chapter 122, SubChapter B 122.143(4)
5C THC Chapter 382, SubChapter D 382.085(b)

Rqmt Prov: OP FOP O-02206 STC 11

Description: failure to record firebox temperature of incinerators A32CPSTO6D and A32CPSTO6C and failed to detect pilot flame for flare A32CSST284 for one hour between April 25, 2006 at 9:00 a.m. through April 26, 2006 at 10:00 a.m. while compute files were backed-up.

Self Report? NO Classification: Moderate

Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)
5C THC Chapter 382, SubChapter D 382.085(b)

Rqmt Prov: OP FOP O-02206 STC 11
PERMIT NSR Permit No. R-770 SC 17 B(2)

Description: failure to maintain minimum Liquid / Gas (L/G) ratio for the Huntsman's ammonia

scrubber 36 times during July 16, 2005 through January 15, 2006.

Date: 08/31/2007 (543556)

Self Report? NO **Classification:** Minor
Citation: 30 TAC Chapter 111, SubChapter A 111.111(a)(1)(A)
30 TAC Chapter 122, SubChapter B 122.143(4)
5C THC Chapter 382, SubChapter D 382.085(b)
Rqmt Prov: OP O-2208, STC 3(A)(ii)
Description: Failure to conduct visible emission observations for unit ID B19S2, each quarter from April 4, 2004 through September 30, 2005.

Self Report? NO **Classification:** Minor
Citation: 30 TAC Chapter 115, SubChapter D 115.352(4)
30 TAC Chapter 122, SubChapter B 122.143(4)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.167(a)(1)
5C THC Chapter 382, SubChapter D 382.085(b)
Rqmt Prov: PERMIT NSR Permit No. 20432 SC 2E
OP O-02208 STC 1(F)
Description: Failure to plug 12 open-ended lines during October 19, 2005 through September 27, 2006.
This is an alleged violation of 40 CFR 63.167(a)(1) and 30 TAC 115.352(4).

Self Report? NO **Classification:** Minor
Citation: 30 TAC Chapter 115, SubChapter H 115.722(d)
30 TAC Chapter 122, SubChapter B 122.143(4)
40 CFR Chapter 60, SubChapter C, PT 60, SubPT A 60.18(c)(3)(ii)
5C THC Chapter 382, SubChapter D 382.085(b)
Rqmt Prov: PERMIT NSR Permit No. 20232 SC 4
OP O-02208 STC 17
Description: Failure to maintain minimum BTU of 300 Btu/scf for the flares B23G1FS865, B70ALF1, and B70ALF801 during April 19, 2006 through October 17, 2006 and November 5, 2005 through April 18, 2006.

Self Report? NO **Classification:** Minor
Citation: 30 TAC Chapter 115, SubChapter H 115.725(d)(4)
30 TAC Chapter 122, SubChapter B 122.143(4)
5C THC Chapter 382, SubChapter D 382.085(b)
Rqmt Prov: OP O-02208 STC 1M
Description: Failure to analyze grab samples when the on-line analyzer data unavailable for 15 instances from June 13, 2006 through August 13, 2006 for the unit B23G2F865 and for two instances from February 1, 2006 through June 27, 2006 for the unit B70AKF1.

Self Report? NO **Classification:** Minor
Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)
5C THC Chapter 382, SubChapter D 382.085(b)
Rqmt Prov: PERMIT NSR Permit No. 20432 SC 1-12A
OP O-0228 STC 17
Description: failure to install a rupture disc upstream of PSV in HAP service. This is an alleged violation of NSR Permit No. 20432 SC I-12A

Self Report? NO **Classification:** Minor
Citation: 30 TAC Chapter 122, SubChapter B 122.143(4)
40 CFR Chapter 61, SubChapter C, PT 61, SubPT A 61.14(b)
40 CFR Chapter 61, SubChapter C, PT 61, SubPT FF 61.356(j)(7)
5C THC Chapter 382, SubChapter D 382.085(b)
Rqmt Prov: OP O-02208 STC 9G
Description: failure to maintain monitoring data for the flare, B23G2F865 from July 4, 2006

through July 5, 2006.
Self Report? NO Classification: Minor
Citation: 30 TAC Chapter 122, SubChapter B 122.143(4)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.163(b)(1)
5C THC Chapter 382, SubChapter D 382.085(b)
Rqmt Prov: OP O-02208 STC 1F
Description: failure to monitor a pump during September 1, 2006 through October 18, 2006.
This is an alleged violation of 40 CFR 63.163(b)(1).

Self Report? NO Classification: Minor
Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)
5C THC Chapter 382, SubChapter D 382.085(b)
Rqmt Prov: PERMIT NSR Permit 20432 SC 2F
OP O-02208 STC 17
Description: failure to replace rupture disc at the earliest convenience during January 31,
2006 through March 29, 2006.

Self Report? NO Classification: Minor
Citation: 30 TAC Chapter 122, SubChapter B 122.143(4)
40 CFR Chapter 61, SubChapter C, PT 61, SubPT FF 61.349(a)(1)(ii)
5C THC Chapter 382, SubChapter D 382.085(b)
Rqmt Prov: OP O-02208 STC 11
Description: failed to install car seal on the ten (10) bypass valves on closed vent system
during December 13, 2005 though December 14, 2005.

Date: 10/03/2007 (543554)

Self Report? NO Classification: Moderate
Citation: 30 TAC Chapter 116, SubChapter G 116.715(a)
30 TAC Chapter 122, SubChapter B 122.143(4)
5C THC Chapter 382, SubChapter D 382.085(b)
Rqmt Prov: PERMIT NSR 20432; SC I-9.C., SC I-9.D., SC I-9.E.
OP Title V O-02207; SC 14.A.
Description: failed to maintain water flow rates to scrubbers with a minimum rate as indicated
in the permit

Self Report? NO Classification: Moderate
Citation: 30 TAC Chapter 116, SubChapter B 116.116(a)(1)
30 TAC Chapter 122, SubChapter B 122.143(4)
5C THC Chapter 382, SubChapter D 382.085(b)
Rqmt Prov: OP Title V O-02207; SC 14.A.
Description: failed to maintain water flow to the Scrubber, EPN B64VS3, with a minimum rate
of 30 gallons per minute on November 27, 2005.

Self Report? NO Classification: Minor
Citation: 30 TAC Chapter 116, SubChapter G 116.715(a)
30 TAC Chapter 122, SubChapter B 122.143(4)
5C THC Chapter 382, SubChapter D 382.085(b)
Rqmt Prov: PERMIT NSR 20432,; SC I-38.C.
OP Title V O-02207; SC 14.A.
Description: failed to perform quarterly cylinder gas audits (CGAs) on the continuous
emissions monitoring system (CEMS) for Epoxy 2 Carbon Bed, EPN B62CB1 from
April 1, 2005 through June 30, 2006.

Self Report? NO Classification: Minor
Citation: 30 TAC Chapter 122, SubChapter B 122.143(4)
5C THC Chapter 382, SubChapter D 382.085(b)
Rqmt Prov: OP Title V O-02207; SC 3.B.(iii)

Description: failed to perform annual observations of the stationary vents, EPN B62E2RX1 and B43E3RX1 from January 16, 2004 to April 18, 2006, and failed to keep records of annual observations of the stationary vent, EPN B52V001 from April 18, 2004 to October 18, 2006

Self Report? NO Classification: Minor
Citation: 30 TAC Chapter 116, SubChapter G 116.715(a)
30 TAC Chapter 122, SubChapter B 122.143(4)
5C THC Chapter 382, SubChapter D 382.085(b)

Rqmt Prov: PERMIT NSR 20432; SC I-37.C.
OP Title V O-02207; SC 14.A.

Description: failed to convert volatile organic compounds (VOC) concentrations to pounds per hour from April 1, 2005 to July 31, 2006 for Epoxy 2 Carbon Bed, EPN B62CB1.

Self Report? NO Classification: Minor
Citation: 30 TAC Chapter 115, SubChapter D 115.352(4)
30 TAC Chapter 116, SubChapter G 116.715(a)
30 TAC Chapter 122, SubChapter B 122.143(4)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.167(a)(1)

Rqmt Prov: 5C THC Chapter 382, SubChapter D 382.085(b)
PERMIT NSR 20432: SC 2E
OP Title V O-02207; SC 1.A., 14.A.

Description: failed to equip open-ended lines in hazardous air pollutant (HAP) and in VOC service with a cap or plug.

Self Report? NO Classification: Minor
Citation: 30 TAC Chapter 117, SubChapter B 117.345(d)
30 TAC Chapter 122, SubChapter B 122.143(4)
5C THC Chapter 382, SubChapter D 382.085(b)

Rqmt Prov: OP Title V O-02207; SC 1.A.

Description: failed to submit a semi-annual NOx CEMS report for Boilers B-901, B-902, and B-903, EPN OC3U3B901, EPN OC3U3B902, and EPN OC3U3B903, within the established deadline.

Self Report? NO Classification: Minor
Citation: 30 TAC Chapter 122, SubChapter B 122.143(4)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT A 63.10(e)(3)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT W 63.528(a)
5C THC Chapter 382, SubChapter D 382.085(b)

Rqmt Prov: OP Title V O-02207; SC 1.A.
OP Title V O-02207; SC 8.G.

Description: failed to submit a semi-annual report for the Epoxy Products (1) Unit, within the established deadline.

Self Report? NO Classification: Minor
Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.163(c)(1)
5C THC Chapter 382, SubChapter D 382.085(b)

Rqmt Prov: PERMIT NSR 3434; SC 6.F.
OP Title V O-02207; SC 1.A., 14.A.

Description: failed to re-monitor of a fugitive leaker within 15 days of the detection of the leak.

Self Report? NO Classification: Minor
Citation: 30 TAC Chapter 122, SubChapter B 122.143(4)
30 TAC Chapter 122, SubChapter B 122.145(2)(A)
5C THC Chapter 382, SubChapter D 382.085(b)

Rqmt Prov: OP Title V O-02207: General Conditions

Description: failed to report all instances of deviations in the deviation report dated November 18, 2005

Date: 10/23/2007 (566959)

Self Report? NO Classification: Minor

Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)
5C THC Chapter 382, SubChapter D 382.085(b)

Rqmt Prov: PERMIT NSR 20909; SC 7.
OP Title V O-02211; SC 14.

Description: Site failed to maintain a positive flow from the vent header system to the thermal oxidizer (EPN B35EWS200) on November 14 and 15, 2006.

Self Report? NO Classification: Minor

Citation: 30 TAC Chapter 122, SubChapter B 122.143(4)
40 CFR Chapter 68, SubChapter C, PT 68, SubPT D 68.69(c)
5C THC Chapter 382, SubChapter D 382.085(b)

Rqmt Prov: OP Title V O-02211; SC 20

Description: Site failed to certify the operating procedures required by 40 CFR 68.69(c) pertaining to risk management processes to assure that they are current and accurate.

Date: 01/09/2008 (595622)

Self Report? NO Classification: Moderate

Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)
40 CFR Chapter 60, SubChapter C, PT 60, SubPT A 60.18(c)(3)(ii)
5C THSC Chapter 382 382.085(b)

Rqmt Prov: OP FOP 2212, SC # 16
OP FOP 2212, SC # 1A
PERMIT NSR # 22072 SC # 4

Description: Failure to maintain minimum flare heating values of 300 Btu/scf for flares BSRFMNF and BSRF401

Self Report? NO Classification: Moderate

Citation: 30 TAC Chapter 116, SubChapter B 116.115(b)(2)(F)
30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)
5C THSC Chapter 382 382.085(b)

Rqmt Prov: OP FOP 2212, SC #16
PERMIT NSR # 22072, SC # 1

Description: **Failure to maintain maximum allowable VOC emissions of 0.94 lb/hr during the times the BSRFMNF flare was below 300 Btu/scf on July 24, 2006 from 1500-1600, and from August 11, 2006 at 1900 to August 14, 2006 at 0700.**

Self Report? NO Classification: Minor

Citation: 30 TAC Chapter 117, SubChapter B 117.219(f)(2)(C)
5C THSC Chapter 382 382.085(b)

Description: Failure to record permanent records of the daily NOx emissions and fuel usage (or exhaust stack flow) from January 1, 2007 to March 28, 2007 for EPN BSRHDHTR.

Self Report? NO Classification: Minor

Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)
5C THSC Chapter 382 382.085(b)

Rqmt Prov: OP FOP 2212, SC # 17
PERMIT NSR # 22072, SC # 10A

Description: Failure to consistently conduct audio, visual, & olfactory (AVO) inspections for chlorine leaks within the operating area every four hours (19 times) from January

1, 2007 to July 6, 2007.

Date: 01/09/2008 (595628)

Self Report? NO Classification: Minor

Citation: 30 TAC Chapter 115, SubChapter D 115.352(4)
30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.167(a)(1)
5C THSC Chapter 382 382.085(b)

Rqmt Prov: PERMIT NSR #770, SC26E

OP O-02206, STC 11
OP O-02206, STC 1A

Description: Failed to seal 10 open-ended valves or lines with a cap, blind flange, plug or a second valve.

Self Report? NO Classification: Moderate

Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.169(a)
5C THSC Chapter 382 382.085(b)

Rqmt Prov: PERMIT NSR#770, SC26F

OP O-02206, SC12
OP O-02206, SC1A

Description: Failed to monitor nine fugitive components.

Self Report? NO Classification: Minor

Citation: 30 TAC Chapter 115, SubChapter B 115.116(a)(3)
30 TAC Chapter 122, SubChapter B 122.143(4)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT MMM 63.1366(b)(2)(i)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT MMM 63.1366(b)(2)(ii)
5C THSC Chapter 382 382.085(b)

Rqmt Prov: OP O-02206, STC1A

Description: Failed to record two periodic monitoring records.

Date: 01/28/2008 (610685)

Self Report? NO Classification: Moderate

Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)
5C THSC Chapter 382 382.085(b)

Rqmt Prov: PERMIT 37884, SC 3 (C)

OP O-02313, SC 9

Description: Failure to stay below the maximum operating limit for NOx on flare FV600.

Date: 01/29/2008 (615960)

Self Report? NO Classification: Moderate

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

Rqmt Prov: PA 20774

Description: Failure to inspect relief valves as required by permit No. 20774.

Date: 02/13/2008 (610665)

Self Report? NO Classification: Minor

Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)

Rqmt Prov: 5C THSC Chapter 382 382.085(b)
PERMIT NSR Permit 20776, Special Condition 5
OP O-02311, Special Terms and Conditions 10

Description: Failure to operate at a minimum pressure of 2 psig and a maximum pressure of 10 psig on Unit B6610QUV53.

Self Report? NO Classification: Minor
Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)
5C THSC Chapter 382 382.085(b)

Rqmt Prov: PERMIT NSR Permit 20776, Special Condition 8
OP O-02311 Special Terms and Conditions 10

Description: Failure to maintain the minimum flow rate of 0.6 gallon per minute on the Acid Scrubber System (D-27).

Self Report? NO Classification: Moderate
Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)
5C THSC Chapter 382 382.085(b)

Rqmt Prov: PERMIT NSR Permit 20776, Special Condition 7I
OP O-02311, Special Terms and Conditions 10

Description: Failure to monitor one component out of 3814 fugitive components for three monitoring periods.

Date: 02/28/2008 (637300)

Self Report? NO Classification: Minor
Citation: 30 TAC Chapter 290, SubChapter D 290.45(d)(2)(B)(ii)

Description: Failure to provide a ground storage capacity which is equal to 50% of the maximum daily demand.

Date: 03/06/2008 (595630)

Self Report? NO Classification: Minor
Citation: 30 TAC Chapter 115, SubChapter H 115.725(d)(4)
30 TAC Chapter 122, SubChapter B 122.143(4)
5C THSC Chapter 382 382.085(b)

Rqmt Prov: OP FOP O-02213, SC 1(L)(iii)

Description: **Failure to collect grab samples when the on-line analyzer (OC6L8F1000) data was unavailable (2 instances) from November 1, 2006 at 0833 to November 30, 2006 at 0955.**

Self Report? NO Classification: Moderate
Citation: 30 TAC Chapter 115, SubChapter D 115.352(4)
30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)
40 CFR Chapter 1, SubChapter C, PT 61, SubPT V 61.242-6(a)(1)
40 CFR Chapter 60, SubChapter C, PT 60, SubPT VV 60.482-6(a)(1)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.167(a)(1)
5C THSC Chapter 382 382.085(b)

Rqmt Prov: OP FOP O-02213, SC 1(A)
OP FOP O-02213, SC 1(D)
OP FOP O-02213, SC 16
PERMIT NSR 20432, SC 1(E)

Description: **Failure to seal fifty (50) open-ended lines containing volatile organic compounds for B72L2FU1 and OC6L8FU01 from May 16, 2006 at 1500 to August 3, 2006 at 1159 and from November 29, 2006 at 1200 to March 21, 2007 at 1150.**

Self Report? NO Classification: Minor
 Citation: 30 TAC Chapter 115, SubChapter D 115.354(2)(C)
 30 TAC Chapter 116, SubChapter B 116.115(c)
 30 TAC Chapter 122, SubChapter B 122.143(4)
 40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.168(b)
 5C THSC Chapter 382 382.085(b)
 Rqmt Prov: OP FOP O-02213, SC 1(A)
 OP FOP O-02213, SC 1(D)
 OP FOP O-02213, SC 16
 PERMIT NSR 20432 (GMA) SC 1(F)

Description: Failure to monitor 61 newly installed valves as required from October 15, 2006 at 0000 to April 18, 2007 at 2359 for B72L2FU1.

Self Report? NO Classification: Minor
 Citation: 30 TAC Chapter 115, SubChapter D 115.354(11)
 30 TAC Chapter 116, SubChapter B 116.115(c)
 30 TAC Chapter 122, SubChapter B 122.143(4)
 5C THSC Chapter 382 382.085(b)
 Rqmt Prov: OP FOP O-02213, SC 16
 PERMIT NSR 20432 (GMA), SC 1(E)

Description: Failure to monitor 512 newly installed connectors as required from October 15, 2006 at 0000 to April 18, 2007 at 2359 for B72L2FU1.

Self Report? NO Classification: Minor
 Citation: 30 TAC Chapter 115, SubChapter D 115.354(2)(C)
 30 TAC Chapter 116, SubChapter B 116.115(c)
 30 TAC Chapter 122, SubChapter B 122.143(4)
 40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.163(b)(1)
 5C THSC Chapter 382 382.085(b)
 Rqmt Prov: OP FOP O-02213, SC 1(A)
 OP FOP O-02213, SC 1(D)
 OP FOP O-02213, SC 16
 PERMIT NSR 20432 (GMA), SC 1(G)

Description: Failure to monitor 2 newly installed pumps as required from October 15, 2006 at 0000 to April 18, 2007 at 2359 for B72L2FU1.

Self Report? NO Classification: Minor
 Citation: 30 TAC Chapter 115, SubChapter D 115.354(2)(C)
 30 TAC Chapter 116, SubChapter B 116.115(c)
 30 TAC Chapter 122, SubChapter B 122.143(4)
 40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.163(b)(1)
 5C THSC Chapter 382 382.085(b)
 Rqmt Prov: OP FOP O-02213, SC 1(A)
 OP FOP O-02213, SC 1(D)
 OP FOP O-02213, SC 16
 PERMIT NSR 21596, SC 13

Description: Failure to monitor one fugitive component (pump EAI266096 in light liquid service) from November 1, 2006 at 0000 to April 18, 2007 at 2350 for A17FU2.

Self Report? NO Classification: Minor
 Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
 30 TAC Chapter 122, SubChapter B 122.143(4)
 5C THSC Chapter 382 382.085(b)
 Rqmt Prov: OP FOP O-02213, SC 16
 PERMIT NSR 20432, Ch. III, SC III-24(G)(1)(b)

Description: Failure to complete analysis of cracked gas sulfur content which was collected but not analyzed by the end of the 1st quarter, from April 1, 2007 at 0000 to April

18, 2007 at 2359.

Self Report? NO Classification: Moderate
Citation: 30 TAC Chapter 116, SubChapter B 116.110(a)
30 TAC Chapter 122, SubChapter B 122.143(4)
5C THSC Chapter 382 382.085(b)

Rqmt Prov: OP FOP O-02213, SC 16
Description: Failure to submit a permit-by-rule for HRVOC analyzer vents B72L7FU1, OC6L8FU01, A17EAFU2, B31S1FU1, and B71S2FU1) from January 30, 2006 at 0000 to October 18, 2006 at 2350 and from October 19, 2006 at 0000 to April 18, 2007.

Self Report? NO Classification: Minor
Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)
5C THSC Chapter 382 382.085(b)

Rqmt Prov: OP FOP O-02213, SC 16
PERMIT NSR 20432, Ch. IV, SC IV-10(D)
PERMIT NSR 21596, SC 15(C)

Description: Failure to reduce the individual average NOx and CO concentrations to units of the applicable permit allowable emission rates at the required frequency as stated in the permit from April 19, 2004 at 0000 to April 4, 2007 at 2359 for B31HMOD1B and 71S123/A17S551.

Self Report? NO Classification: Moderate
Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)
5C THSC Chapter 382 382.085(b)

Rqmt Prov: OP FOP O-02213, SC 16
PERMIT NSR 20432 (GMA), SC 4

Description: Failure to prevent five (5) occurrences of excess the flare tip exit velocity for flare waste gas from May 03, 2006 at 0200 to May 11, 2006 at 2100 (2 occurrences) and from November 22, 2006 at 0800 to February 2, 2007 at 1500 (3 occurrences) for flare OC6L8F1000.

Self Report? NO Classification: Moderate
Citation: 30 TAC Chapter 116, SubChapter B 116.115(b)(2)(F)
30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)
5C THSC Chapter 382 382.085(b)

Rqmt Prov: OP FOP O-02213, SC 16
PERMIT NSR 20432, Ch. III, SC III-1

Description: Failure to prevent Maximum Allowable Emissions Rate Table (MAERT) occurrences due to excess the flare tip exit velocity for flare waste gas on February 4, 2007 for flare OC6L8F1000. Total VOC emissions were 267.6 lbs/hr (126.0 lbs/hr maximum allowed per the interim CAP effective from December 31, 2005 to July 1, 2008).

Self Report? NO Classification: Moderate
Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)
5C THSC Chapter 382 382.085(b)

Rqmt Prov: OP FOP O-02213, SC 1(A)
OP FOP O-02213, SC 16
PERMIT NSR 21596, SC 8

Description: Failure to maintain minimum flare Btu/scf value at or above 300 on August 6, 2006 from 1300-1400 for A17EAF11.

Self Report? NO Classification: Moderate
Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)

40 CFR Chapter 60, SubChapter C, PT 60, SubPT NNN 60.662(a)
5C THSC Chapter 382 382.085(b)
Rqmt Prov: OP FOP O-02213, SC 16
PERMIT NSR 21596, SC 3
Description: Failure to maintain minimum firebox temperature at or above 663 degrees Celsius
on May 21, 2006 from 1300 to 2100 for A17EAH551.
Self Report? NO Classification: Moderate
Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)
5C THSC Chapter 382 382.085(b)
Rqmt Prov: OP FOP O-02213, SC 16
PERMIT NSR 21596, GC 8
PERMIT NSR 21596, SC 1
Description: Failure to prevent Maximum Allowable Emission Rate Table (MAERT) exceedance
for A17S551 due to low firebox temperature below 663 degrees Celsius on May
21, 2006 from 1300 to 2100 for A17EAH551.
Self Report? NO Classification: Minor
Citation: 30 TAC Chapter 101, SubChapter F 101.201(b)
30 TAC Chapter 122, SubChapter B 122.143(4)
5C THSC Chapter 382 382.085(b)
Rqmt.Prov: OP FOP O-02213 SC 2F
Description: Failure to make a final record of a recordable event within 14 days (2
occurrences) for the loss of 2 lbs of VOC from A17EAF11 and the 3 lbs of VOC
from A17EAF11.

Date: 03/10/2008 (619156)

Self Report? NO Classification: Minor
Citation: 30 TAC Chapter 101, SubChapter A 101.20(1)
30 TAC Chapter 101, SubChapter F 101.221(a)
30 TAC Chapter 116, SubChapter B 116.115(c)
40 CFR Chapter 60, SubChapter C, PT 60, SubPT A 60.18(c)(3)(ii)
Rqmt Prov: PERMIT TCEQ Air Permit No. 21596, SC 3
PERMIT TCEQ Air Permit No. 21596, SC 8
Description: **Dow failed to maintain the net heating value of the flare for one hour during an
emissions event (Incident 101569) that occurred on December 19, 2007 and
lasted 15 hours and 17 minutes.**

Date: 06/30/2008 (690045)

Self Report? YES Classification: Moderate
Citation: 2D TWC Chapter 26, SubChapter A 26.121(a)
30 TAC Chapter 305, SubChapter F 305.125(1)
Description: Failure to meet the limit for one or more permit parameter

Date: 07/02/2008 (618777)

Self Report? NO Classification: Moderate
Citation: 30 TAC Chapter 115, SubChapter D 115.352(4)
30 TAC Chapter 115, SubChapter H 115.783(5)
30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)
40 CFR Chapter 1, SubChapter C, PT 61, SubPT V 61.242-6(a)(1)
40 CFR Chapter 60, SubChapter C, PT 60, SubPT VV 60.482-1(d)
40 CFR Chapter 60, SubChapter C, PT 60, SubPT VV 60.482-6(a)(1)

40 CFR Chapter 61, SubChapter C, PT 61, SubPT V 61.242-1(c)
40 CFR Part 60, Subpart VV 60.482-1(c)
5C THSC Chapter 382 382.085(b)
Rqmt Prov: OP SC 15
PERMIT SC 2 E
Description: Failure to install plugs for open ended lines during the annual compliance certification period 10/19/06 through 10/18/07.
Self Report? NO Classification: Moderate
Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)
30 TAC Chapter 122, SubChapter B 122.145
5C THSC Chapter 382 382.085(b)
Rqmt Prov: OP SC 15
PERMIT SC I-9 (B), (C), & (D)
Description: Failure to maintain inlet water flow to the adsorber, process vents and storage tanks.

Date: 08/11/2008 (681763)
Self Report? NO Classification: Minor
Citation: 30 TAC Chapter 122, SubChapter B 122.143(4)
5C THSC Chapter 382 382.085(b)
Rqmt Prov: OP FOP O-02204, General Terms & Conditions
OP FOP O-02204, Special Term & Condition 10
Description: Failure to operate the liquid/gas ratio of the scrubber at the prescribed levels.
Self Report? NO Classification: Minor
Citation: 30 TAC Chapter 115, SubChapter D 115.352(2)
30 TAC Chapter 115, SubChapter H 115.781(b)
30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)
5C THSC Chapter 382 382.085(b)
Rqmt Prov: OP FOP O-02204, Special Term & Condition 11
OP FOP O-02204, Special Term & Condition 1A
PERMIT Permit 19041, Special Condition 20F
Description: Failure to perform Method 21 monitoring to one valve in VOC service on a quarterly basis.
Self Report? NO Classification: Minor
Citation: 30 TAC Chapter 122, SubChapter B 122.143(4)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT A 63.6(e)(3)(iii)
5C THSC Chapter 382 382.085(b)
Rqmt Prov: OP FOP O-02204, Special Term & Condition 1A
Description: Failure to properly and completely record corrective actions in response to an SSM event.
Self Report? NO Classification: Minor
Citation: 30 TAC Chapter 122, SubChapter B 122.143(4)
5C THSC Chapter 382 382.085(b)
Rqmt Prov: OP FOP O-02204, Special Term & Condition 11
PERMIT Permit 19041, Special Condition 2A
Description: Failure to operate one safety valve in conjunction with a rupture disc.
Self Report? NO Classification: Minor
Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.168(f)(1)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.174(d)
5C THSC Chapter 382 382.085(b)

Rqmt Prov: OP FOP O-02204, Special Term & Condition 11
OP FOP O-02204, Special Term & Condition 1A
PERMIT Permit 19041, Special Condition 201
PERMIT Permit 48715, Special Condition 8I

Description: Failure to perform remonitoring of seven leaking LDAR components, after repairs were made, within 15 days of the date the leak was found.

Self Report? NO Classification: Minor
Citation: 30 TAC Chapter 115, SubChapter D 115.354(2)
30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.168(d)(2)
5C THSC Chapter 382 382.085(b)

Rqmt Prov: OP FOP O-02204, Special Term & Condition 11
OP FOP O-02204, Special Term & Condition 1A
PERMIT Permit 941, Special Condition 5E

Description: Failure to perform quarterly LDAR monitoring to 338 components from February 25, 2005 through January 31, 2008.

Date: 08/20/2008 (610600)

Self Report? NO Classification: Moderate
Citation: 30 TAC Chapter 115, SubChapter H 115.726(c)(2)
30 TAC Chapter 122, SubChapter B 122.143(4)
5C THSC Chapter 382 382.085(b)

Rqmt Prov: OP FOP 2219, Spec. Cond 1I

Description: Failure to record pressure readings on a pressure safety valve (PSV).

Self Report? NO Classification: Moderate
Citation: 30 TAC Chapter 115, SubChapter D 115.356(2)(F)
30 TAC Chapter 122, SubChapter B 122.143(4)
5C THSC Chapter 382 382.085(b)

Rqmt Prov: PERMIT NSR Permit No. 20775, Spec. Cond 3E

Description: Failure to record leaks from AVO observations.

Self Report? NO Classification: Minor
Citation: 30 TAC Chapter 106, SubChapter K 106.261(a)(6)
30 TAC Chapter 116, SubChapter B 116.110(a)(4)
30 TAC Chapter 122, SubChapter B 122.143(4)
5C THSC Chapter 382 382.085(b)

Rqmt Prov: OP Spec. Cond. 14

Description: Late submittal of a Permit by Rule (PBR).

Date: 08/27/2008 (680057)

Self Report? NO Classification: Moderate
Citation: 30 TAC Chapter 122, SubChapter B 122.143(4)
30 TAC Chapter 122, SubChapter B 122.145(2)(C)
5C THSC Chapter 382 382.085(b)

Rqmt Prov: OP O-02220 General Terms and Conditions

Description: Failure to submit the semi-annual deviation report dated August 28, 2007 within thirty days of the end of the reporting period.

Self Report? NO Classification: Moderate
Citation: 30 TAC Chapter 122, SubChapter B 122.143(4)
40 CFR Chapter 60, SubChapter C, PT 60, SubPT A 60.18(c)(3)(ii)
5C THSC Chapter 382 382.085(b)

Rqmt Prov: PERMIT 1472 Special Condition 7(A)

OP O-02220 Special Terms and Conditions 1A
OP O-02220 Special Terms and Conditions 7
Description: Failure to maintain a minimum net heating value of 300 BTU/scf for the gas being combusted at the flare (A26VEF1) on two occasions from September 15 to 16, 2007 and November 11 through 28, 2007.

Date: 11/07/2008 (701151)

Self Report? NO

Classification: Minor

Citation: 30 TAC Chapter 101, SubChapter F 101.211(c)

Description: Failure to submit a Final Report for Incident No. 109697 within 14 days of the end of a startup activity

F. Environmental audits.

Notice of Intent Date: 02/18/2004 (265119)

No DOV Associated

Notice of Intent Date: 03/19/2004 (336700)

No DOV Associated

Notice of Intent Date: 04/14/2004 (274298)

No DOV Associated

Notice of Intent Date: 06/14/2004 (347895)

No DOV Associated

Notice of Intent Date: 12/17/2004 (347242)

Disclosure Date: 11/23/2005

Viol. Classification: Moderate

Citation: 30 TAC Chapter 115, SubChapter D 115.354(2)(A)
30 TAC Chapter 115, SubChapter D 115.354(2)(B)
30 TAC Chapter 115, SubChapter D 115.354(2)(C)
30 TAC Chapter 115, SubChapter D 115.354(2)(D)
30 TAC Chapter 115, SubChapter H 115.781(b)
30 TAC Chapter 115, SubChapter H 115.781(b)(8)
40 CFR Chapter 60, SubChapter C, PT 60, SubPT VV 60.482-7
40 CFR Chapter 61, SubChapter C, PT 61, SubPT V 61.242-7
40 CFR Chapter 61, SubChapter C, PT 61, SubPT FF 61.349(a)(1)(i)

Rqmt Prov: PERMIT NSR Permit 20432

PERMIT NSR Permit 22072

Description: Failure to monitor Valves, Connectors, Pressure Relief Valves, Pumps, Compressors, Agitator and Instrumentation Systems in the Salt Dome Operation, LHC-7 and LHC8.

Viol. Classification: Minor

Citation: 30 TAC Chapter 101, SubChapter A 101.10

Description: Failure to include components which missed monitoring in emissions inventory calculations.

Notice of Intent Date: 03/30/2005 (378947)

No DOV Associated

(380855)
Notice of Intent Date: 04/20/2005 (380855)
Disclosure Date: 10/28/2005

Viol. Classification: Moderate

Citation: 40 CFR Chapter 265, SubChapter I, PT 265, SubPT BB 265.1057
40 CFR Chapter 63, SubChapter C, PT 63, SubPT MMM 63.1363(b)(1)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT MMM 63.1363(b)(3)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT MMM 63.1363(c)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT MMM 63.1363(e)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.163(b)(1)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.168(d)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.174(b)

Rqmt Prov: PERMIT NSR Permit 2473

Description: Failed to monitor all components under a prescribed Leak Detection and Repair Program.

Viol. Classification: Minor

Citation: 30 TAC Chapter 101, SubChapter A 101.10

Description: Failed to include missed monitored components in emissions inventory.

Notice of Intent Date: 08/16/2005 (434104)
Disclosure Date: 02/22/2006

Viol. Classification: Moderate

Rqmt Prov: PERMIT NSR permit 37884

Description: Failure to monitor 369 Valves, 1156 Connectors and 31 Pressure Relief Valves in the OC4 Polypropylene Unit.

Viol. Classification: Minor

Citation: 30 TAC Chapter 101, SubChapter A 101.10(b)
40 CFR Chapter 372, SubChapter J, PT 372, SubPT B 372.30

Description: Failed to report emission calculations of components that were not monitored under a prescribed LDAR program

Notice of Intent Date: 09/16/2005 (436340)
Disclosure Date: 11/28/2005

Viol. Classification: Moderate

Citation: 30 TAC Chapter 115, SubChapter D 115.354(2)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.168(b)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.174(a)

Description: Failure to monitor components within an LDAR program.

Notice of Intent Date: 10/26/2005 (465631)
Disclosure Date: 04/27/2006

Viol. Classification: Moderate

Citation: 30 TAC Chapter 115, SubChapter D 115.354(2)(B)
30 TAC Chapter 115, SubChapter D 115.354(2)(C)
30 TAC Chapter 115, SubChapter D 115.354(2)(D)
30 TAC Chapter 115, SubChapter H 115.781(b)
30 TAC Chapter 115, SubChapter H 115.781(b)(3)
30 TAC Chapter 115, SubChapter H 115.781(b)(8)
30 TAC Chapter 115, SubChapter H 115.781(f)
30 TAC Chapter 115, SubChapter H 115.789(1)

Rqmt Prov: PERMIT 19519
PERMIT 48813

PERMIT 6803

Description: Failure to monitor Valves, Connectors, Pressure Relief Valves in B25 Polyethylene 2 and failure to monitor Valves, Connectors, Pressure Relief Valves, Agitator and Pumps in B27 Polyethylene 3.

Viol. Classification: Minor

Citation: 30 TAC Chapter 101, SubChapter A 101.10

Description: Failure to include components which missed monitoring (B25 Polyethylene 2 and B27 Polyethylene 3) in the emissions inventory calculations.

Viol. Classification: Moderate

Citation: 30 TAC Chapter 115, SubChapter D 115.352(4)

Description: Failure to close open ended lines.

Disclosure Date: 10/25/2006

Viol. Classification: Moderate

Citation: 30 TAC Chapter 115, SubChapter D 115.354(2)(B)

30 TAC Chapter 115, SubChapter D 115.354(2)(C)

30 TAC Chapter 115, SubChapter D 115.354(2)(D)

30 TAC Chapter 115, SubChapter H 115.781(b)

30 TAC Chapter 115, SubChapter H 115.781(b)(3)

30 TAC Chapter 115, SubChapter H 115.781(b)(8)

30 TAC Chapter 115, SubChapter H 115.781(f)

30 TAC Chapter 115, SubChapter H 115.789(1)

Rqmt Prov: PERMIT 19519

PERMIT 48813

PERMIT 6803

Description: Failure to monitor Valves, Connectors, Pressure Relief Valves in B25 Polyethylene 2 and failure to monitor Valves, Connectors, Pressure Relief Valves, Agitator and Pumps in B27 Polyethylene 3.

Viol. Classification: Minor

Citation: 30 TAC Chapter 101, SubChapter A 101.10

Description: Failure to include components which missed monitoring (B25 Polyethylene 2 and B27 Polyethylene 3) in the emissions inventory calculations.

Viol. Classification: Moderate

Citation: 30 TAC Chapter 115, SubChapter D 115.352(4)

Description: Failure to close open ended lines.

Notice of Intent Date: 10/31/2005 (597298)

Disclosure Date: 05/01/2006

Viol. Classification: Moderate

Citation: 30 TAC Chapter 115, SubChapter D 115.354(2)(B)

30 TAC Chapter 115, SubChapter D 115.354(2)(C)

30 TAC Chapter 115, SubChapter D 115.354(2)(D)

30 TAC Chapter 115, SubChapter H 115.781(b)

30 TAC Chapter 115, SubChapter H 115.781(f)

30 TAC Chapter 115, SubChapter H 115.789(1)

40 CFR Chapter 61, SubChapter C, PT 61, SubPT FF 61.349(a)(1)(i)

Rqmt Prov: PERMIT NSR 20432

Description: Failure to monitor components under a prescribed LDAR program

Viol. Classification: Minor

Citation: 30 TAC Chapter 101, SubChapter A 101.10

Description: Failure to include missed monitored components on EIQ.

Notice of Intent Date: 01/06/2006 (452904)

Disclosure Date: 05/12/2006

Viol. Classification: Minor

Citation: 30 TAC Chapter 101, SubChapter F 101.201(b)

Description: RQ emissions event records missing information.

Viol. Classification: Moderate

Rqmt Prov: PERMIT NSR Permit 22070

Description: Failure to maintain monthly emissions records for all storage tanks and loading operations.

Viol. Classification: Minor

Citation: 40 CFR Chapter 61, SubChapter C, PT 61, SubPT V 61.246(h)(1)

Description: Failure to maintain documentation for the design criteria of the seal system, the barrier fluid system or both for dual mechanical seal pumps in benzene service.

Viol. Classification: Minor

Citation: 40 CFR Chapter 61, SubChapter C, PT 61, SubPT V 61.242-1(d)

Description: Failure to label lines for Pygas.

Notice of Intent Date: 02/06/2006 (458261)

Disclosure Date: 08/04/2006

Viol. Classification: Moderate

Citation: 30 TAC Chapter 115, SubChapter D 115.354(2)(D)

30 TAC Chapter 115, SubChapter H 115.781(b)

30 TAC Chapter 115, SubChapter H 115.789(1)

40 CFR Chapter 60, SubChapter C, PT 60, SubPT VV 60.482-4

40 CFR Chapter 60, SubChapter C, PT 60, SubPT VV 60.482-7

40 CFR Chapter 61, SubChapter C, PT 61, SubPT V 61.242-4

40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.169(a)

40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.174(a)(1)

Description: Failure to monitor valves, connectors and pressure relief valves under a prescribed Leak Detection and Repair Program.

Viol. Classification: Moderate

Citation: 30 TAC Chapter 101, SubChapter A 101.10

Description: Failure to submit emissions inventories for missed component monitoring.

Notice of Intent Date: 02/27/2006 (459089)

Disclosure Date: 08/24/2006

Viol. Classification: Moderate

Citation: 30 TAC Chapter 115, SubChapter D 115.354(2)(C)

30 TAC Chapter 115, SubChapter H 115.781(b)

30 TAC Chapter 115, SubChapter H 115.781(f)

30 TAC Chapter 115, SubChapter H 115.789(1)

40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.168(b)

40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.174(a)(1)

Rqmt Prov: PERMIT NSR Permit 5339

Description: Failure to monitor 146 Valves and 499 Connectors in the B15 Trichloroethanes Unit.

Viol. Classification: Minor

Citation: 30 TAC Chapter 101, SubChapter A 101.1

Description: Failure to include components which missed monitoring in emissions inventory calculations.

Notice of Intent Date: 03/29/2006 (464367)

Disclosure Date: 08/30/2006

Viol. Classification: Moderate

Citation: 30 TAC Chapter 115, SubChapter D 115.354(2)(B)
30 TAC Chapter 115, SubChapter D 115.354(2)(C)
30 TAC Chapter 115, SubChapter D 115.354(2)(D)

Rqmt Prov: PERMIT NSR permit 2606

Description: Failure to monitor components

Viol. Classification: Minor

Citation: 30 TAC Chapter 101, SubChapter A 101.10

Description: Failure to include missed monitored components in EIQ submittals

Notice of Intent Date: 03/29/2006 (464509)

Disclosure Date: 10/02/2006

Viol. Classification: Moderate

Citation: 30 TAC Chapter 115, SubChapter D 115.354(2)(C)
30 TAC Chapter 115, SubChapter H 115.781(f)
30 TAC Chapter 115, SubChapter H 115.782(b)
30 TAC Chapter 115, SubChapter H 115.789(1)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.168(b)

Description: Failure to monitor 146 valves and 398 connectors.

Viol. Classification: Minor

Citation: 30 TAC Chapter 101, SubChapter A 101.10

Description: Failure to include missed monitored components in emissions calculations reporting.

Notice of Intent Date: 03/29/2006 (464513)

Disclosure Date: 08/30/2006

Viol. Classification: Moderate

Citation: 30 TAC Chapter 115, SubChapter D 115.354(2)(C)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.160(c)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.174(a)(1)

Rqmt Prov: PERMIT NSR Permit 5340

Description: Failed to monitor 341 Valves and 1018 Connectors in the A18 Chlorinated Methane Unit.

Viol. Classification: Minor

Citation: 30 TAC Chapter 101, SubChapter A 101.10

Description: Failure to include components which missed monitoring in the emissions inventory calculations.

Notice of Intent Date: 03/29/2006 (466306)

Disclosure Date: 09/28/2006

Viol. Classification: Moderate

Citation: 30 TAC Chapter 115, SubChapter D 115.354(2)(C)
30 TAC Chapter 115, SubChapter H 115.781(b)
30 TAC Chapter 115, SubChapter H 115.781(f)
30 TAC Chapter 115, SubChapter H 115.789(1)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.168(b)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.174(b)(1)

Rqmt Prov: PERMIT NSR Permit 8567

Description: Failure to monitor 261 Valves and 715 Connectors in the B77 Adhesive Polymers Plant.

Viol. Classification: Minor

Citation: 30 TAC Chapter 101, SubChapter A 101.10

Description: Failed to include components that missed monitoring in emissions inventory calculations.

Notice of Intent Date: 03/29/2006 (466317)

Disclosure Date: 09/28/2006

Viol. Classification: Moderate

Citation: 30 TAC Chapter 115, SubChapter D 115.354(2)(B)

30 TAC Chapter 115, SubChapter D 115.354(2)(C)

30 TAC Chapter 115, SubChapter H 115.781(b)

30 TAC Chapter 115, SubChapter H 115.781(f)

30 TAC Chapter 115, SubChapter H 115.789(1)

Rqmt Prov: PERMIT NSR Permit 834

Description: Failure to monitor 828 Valves, 3981 Connectors, 4 Pumps, and 6 Relief Valves in the B41 Polyethylene Plant.

Viol. Classification: Moderate

Citation: 30 TAC Chapter 115, SubChapter D 115.352(4)

Description: Failure to close 80 open ended lines in B41 Polyethylene Plant.

Viol. Classification: Minor

Citation: 30 TAC Chapter 101, SubChapter A 101.10

Description: Failure to include missed monitored components in emissions inventory calculations.

Notice of Intent Date: 04/21/2006 (465958)

Disclosure Date: 10/22/2006

Viol. Classification: Moderate

Citation: 40 CFR Chapter 60, SubChapter C, PT 60, SubPT VV 60.482-2

40 CFR Chapter 61, SubChapter C, PT 61, SubPT V 61.242-2

40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.163(b)(2)(i)

Rqmt Prov: PERMIT NSR Flex Permit 20432

Description: Failure to monitor 633 Valves, 5175 Connectors, 4 Relief Devices and 38 Pumps in the B71 Styrene Plant.

Viol. Classification: Moderate

Citation: 30 TAC Chapter 101, SubChapter A 101.10

Description: Failure to include components which missed monitoring in emissions inventory calculations.

Notice of Intent Date: 04/25/2006 (480426)

Disclosure Date: 10/22/2006

Viol. Classification: Moderate

Citation: 30 TAC Chapter 115, SubChapter D 115.354(2)(C)

30 TAC Chapter 115, SubChapter H 115.781(b)

40 CFR Chapter 264, SubChapter I, PT 264, SubPT BB 264.1052

40 CFR Chapter 264, SubChapter I, PT 264, SubPT BB 264.1058

40 CFR Chapter 264, SubChapter I, PT 264, SubPT BB 264.1062(b)

40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.168(b)

40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.173

40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.174(b)(1)

Rqmt Prov: PERMIT NSR Flex Permit 20525

PERMIT NSR Flex Permit 46429

PERMIT NSR Permit 8567

Description: Failure to monitor Valves, Connectors and Agitators in B44 Voranol Plant, failure to monitor Valves and Connectors in B46 SPC Plant and failure to monitor Valves and Connectors in B46 Blending Plant.

Viol. Classification: Moderate

Citation: 30 TAC Chapter 115, SubChapter D 115.354(2)(C)

30 TAC Chapter 115, SubChapter H 115.781(b)

30 TAC Chapter 115, SubChapter H 115.781(f)

30 TAC Chapter 115, SubChapter H 115.789(1)

Rqmt Prov: PERMIT NSR Flex Permit 20525

PERMIT NSR Flex Permit 46429

Description: Failure to include 2 Pumps and 14 Relief Valves in the LDAR Program in B44 Voranol Plant, failure to include 3 Pumps in the LDAR Program in B46 SPC Plant.

Viol. Classification: Minor

Citation: 30 TAC Chapter 101, SubChapter A 101.10

Description: Failure to include components which missed monitoring into Emissions Inventory calculations.

Notice of Intent Date: 05/12/2006 (465966)

Disclosure Date: 11/15/2006

Viol. Classification: Moderate

Citation: 30 TAC Chapter 115, SubChapter D 115.354(2)(B)

30 TAC Chapter 115, SubChapter D 115.354(2)(C)

30 TAC Chapter 115, SubChapter D 115.354(2)(D)

40 CFR Chapter 265, SubChapter I, PT 265, SubPT BB 265.1052

40 CFR Chapter 265, SubChapter I, PT 265, SubPT BB 265.1057(a)

40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.168(b)

40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.173

40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.174(a)

Rqmt Prov: PERMIT NSR Flex permit 20432

Description: Failure to monitor 108 Valves, 392 Connectors and 3 Pumps in the B43 Epoxy 3. Failure to monitor 898 Valves, 3018 Connectors, 12 Pressure Relief Valves, 10 Pumps and 1 Agitator in the B62 Epoxy 2.

Viol. Classification: Minor

Citation: 30 TAC Chapter 101, SubChapter A 101.10

Description: Failure to include missed monitored components in emissions inventory calculations.

Viol. Classification: Minor

Citation: 1 THC Chapter 1 1.001(a)

Rqmt Prov: PERMIT Title V permit O-02207

Description: Failure to included missed monitored components in previous Title V Deviation Reports.

Notice of Intent Date: 06/13/2006 (484536)

Disclosure Date: 05/14/2007

Viol. Classification: Moderate

Citation: 30 TAC Chapter 115, SubChapter D 115.354(2)(B)

30 TAC Chapter 115, SubChapter D 115.354(2)(C)

30 TAC Chapter 115, SubChapter D 115.354(2)(D)

30 TAC Chapter 115, SubChapter H 115.781(f)

30 TAC Chapter 115, SubChapter H 115.789(1)

Rqmt Prov: PERMIT NSR permit 20432

Description: Failure to monitor components

Viol. Classification: Minor

Citation: 30 TAC Chapter 101, SubChapter A 101.10

Description: Failure to include missed monitored components on EIQ reports

Notice of Intent Date: 06/20/2006 (486601)

Disclosure Date: 12/21/2006

Viol. Classification: Moderate

Citation: 30 TAC Chapter 106, SubChapter K 106.261

30 TAC Chapter 106, SubChapter K 106.262

30 TAC Chapter 115, SubChapter D 115.354(2)(B)

30 TAC Chapter 115, SubChapter D 115.354(2)(C)

30 TAC Chapter 115, SubChapter D 115.354(2)(D)

30 TAC Chapter 115, SubChapter H 115.781(b)

30 TAC Chapter 115, SubChapter H 115.781(b)(3)

30 TAC Chapter 115, SubChapter H 115.781(b)(8)

30 TAC Chapter 115, SubChapter H 115.789(1)

Rqmt Prov: PERMIT NSR permit 20775

Description: Failure to monitor components

Viol. Classification: Minor

Citation: 30 TAC Chapter 101, SubChapter A 101.10

Description: Failure to include missed monitored components on EIQ submittals

Notice of Intent Date: 06/26/2006 (488476)

Disclosure Date: 12/27/2006

Viol. Classification: Moderate

Citation: 30 TAC Chapter 115, SubChapter D 115.354(2)(B)

30 TAC Chapter 115, SubChapter D 115.354(2)(C)

30 TAC Chapter 115, SubChapter D 115.354(2)(D)

30 TAC Chapter 115, SubChapter H 115.781(b)

40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.163(b)(2)(i)

40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.168(b)

40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.174(b)(1)

Rqmt Prov: PERMIT NSR 19041

Description: Failure to monitor 3126 valves, 10975 connectors, 8 relief devices, 12 pumps.

Viol. Classification: Minor

Citation: 30 TAC Chapter 101, SubChapter A 101.10

Description: Failure to include missed monitored components in emission calculations reporting.

Viol. Classification: Moderate

Rqmt Prov: PERMIT O-2204

Description: Failure to include missed monitored components in previous Title V deviation reports.

Notice of Intent Date: 08/15/2006 (511065)

Disclosure Date: 11/15/2006

Viol. Classification: Moderate

Citation: 30 TAC Chapter 115, SubChapter D 115.354(2)(B)
30 TAC Chapter 115, SubChapter D 115.354(2)(C)
30 TAC Chapter 115, SubChapter D 115.354(2)(D)
40 CFR Chapter 265, SubChapter I, PT 265, SubPT BB 265.1052
40 CFR Chapter 265, SubChapter I, PT 265, SubPT BB 265.1057(a)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.168(b)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.174(a)

Description: Failure to monitor 402 Valves, 1425 Connectors, 8 Relief Devices and 2 Pumps in the B64 HydroxyAlkylAcrylate Plant.

Viol. Classification: Minor
Citation: 30 TAC Chapter 101, SubChapter A 101.10

Description: Failure to include missed monitored components in the emissions inventory calculations.

Viol. Classification: Minor
Rqmt Prov: PERMIT Title V permit O-02207

Description: Failure to include missed monitored components in previous Title V deviation reports.

Notice of Intent Date: 08/28/2006 (514018)

No DOV Associated

Notice of Intent Date: 10/24/2006 (461404)

Disclosure Date: 04/25/2007

Viol. Classification: Moderate
Citation: 30 TAC Chapter 115, SubChapter D 115.354(2)(B)
30 TAC Chapter 115, SubChapter D 115.354(2)(C)
30 TAC Chapter 115, SubChapter D 115.354(2)(D)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.168(b)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.169(a)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.174(a)

Description: Failure to monitor valves, connectors, relief devices and pumps.

Viol. Classification: Minor
Citation: 30 TAC Chapter 101, SubChapter A 101.10

Description: Failure to include emissions of missed monitored components in emission calculation reporting.

Viol. Classification: Moderate
Citation: 1 THC Chapter 1 1.001(a)
Rqmt Prov: PERMIT Title V Permit O-2207

Description: Failure to include missed monitored components in Title V deviation reports.

Notice of Intent Date: 12/13/2006 (536545)

Disclosure Date: 06/13/2007

Viol. Classification: Moderate
Citation: 30 TAC Chapter 115, SubChapter D 115.354(2)(B)
30 TAC Chapter 115, SubChapter D 115.354(2)(C)
30 TAC Chapter 115, SubChapter D 115.354(2)(D)

Rqmt Prov: PERMIT Permit 20777

Description: Failure to monitor components.

Viol. Classification: Minor
Citation: 30 TAC Chapter 101, SubChapter A 101.10

Description: Failure to include missed monitored components in EIQ submittals.

Viol. Classification: Minor

Rqmt Prov: PERMIT Title V Operating Permit O-02218

Description: Failure to include missed monitored components in the Title V deviation report.

Notice of Intent Date: 12/13/2006 (536549)

Disclosure Date: 06/13/2007

Viol. Classification: Moderate

Citation: 30 TAC Chapter 115, SubChapter D 115.354(2)(B)

30 TAC Chapter 115, SubChapter D 115.354(2)(C)

30 TAC Chapter 115, SubChapter D 115.354(2)(D)

Rqmt Prov: PERMIT Title V Operating Permit O-02221

Description: Failure to monitor components

Viol. Classification: Minor

Citation: 30 TAC Chapter 101, SubChapter A 101.10

Description: Failure to include missed monitored components in EIQ.

Viol. Classification: Minor

Citation: 1 THC Chapter 1 1.001(a)

Rqmt Prov: PERMIT Title V O-02221

Description: Failure to include missed monitored components in Title V deviation report

Notice of Intent Date: 12/27/2006 (537891)

Disclosure Date: 06/26/2007

Viol. Classification: Moderate

Citation: 30 TAC Chapter 115, SubChapter D 115.354(2)(B)

30 TAC Chapter 115, SubChapter D 115.354(2)(C)

30 TAC Chapter 115, SubChapter H 115.781(b)

30 TAC Chapter 115, SubChapter H 115.781(f)

30 TAC Chapter 115, SubChapter H 115.789(1)

Rqmt Prov: PERMIT NSR permit 4031

Description: Failure to monitor components

Viol. Classification: Minor

Citation: 30 TAC Chapter 101, SubChapter A 101.10

Description: Failure to include components in EIQ report submittals

Viol. Classification: Minor

Citation: 1 THC Chapter 1 1.001(a)

Rqmt Prov: PERMIT Title V Operating Permit O-02203

Description: Failure to include missed monitored components on Title V deviation report

Notice of Intent Date: 01/09/2007 (541786)

Disclosure Date: 07/11/2007

Viol. Classification: Moderate

Citation: 30 TAC Chapter 115, SubChapter D 115.354(2)(B)

30 TAC Chapter 115, SubChapter D 115.354(2)(C)

Rqmt Prov: PERMIT NSR Permit 20432

Description: Failure to monitor components under a prescribed LDAR program.

Viol. Classification: Minor

Citation: 30 TAC Chapter 101, SubChapter A 101.10(a)

Description: Failure to include missed monitored components in Emissions Inventory

Viol. Classification: Minor

Rqmt Prov: PERMIT Title V O-02207

Description: Failure to include missed monitored components in Title V deviation reports.

Notice of Intent Date: 01/12/2007 (554256)

No DOV Associated

Notice of Intent Date: 01/19/2007 (541798)

Disclosure Date: 07/12/2007

Viol. Classification: Moderate

Citation: 30 TAC Chapter 115, SubChapter D 115.354(2)(B)

30 TAC Chapter 115, SubChapter D 115.354(2)(C)

30 TAC Chapter 115, SubChapter D 115.354(2)(D)

30 TAC Chapter 115, SubChapter H 115.781(b)

30 TAC Chapter 115, SubChapter H 115.781(f)

30 TAC Chapter 115, SubChapter H 115.789(1)

Rqmt Prov: PERMIT NSR permit 48715

Description: Failure to, under a prescribed LDAR program, monitor 462 valves, 2873 connectors, 1 pump, 5 relief valves.

Viol. Classification: Minor

Citation: 30 TAC Chapter 101, SubChapter A 101.10

Description: Failure to include missed monitored components in EIQs.

Viol. Classification: Minor

Rqmt Prov: PERMIT Title V O-02204

Description: Failure to include missed monitored components in Title V deviation report.

Notice of Intent Date: 01/19/2007 (541800)

Disclosure Date: 07/13/2007

Viol. Classification: Moderate

Citation: 30 TAC Chapter 115, SubChapter D 115.354(2)(B)

30 TAC Chapter 115, SubChapter D 115.354(2)(C)

30 TAC Chapter 115, SubChapter D 115.354(2)(D)

40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.163(b)(2)(i)

40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.168(b)

40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.174(a)

Rqmt Prov: PERMIT NSR 3320

Description: Failure to monitor components under a prescribe LDAR program.

Viol. Classification: Minor

Citation: 30 TAC Chapter 101, SubChapter A 101.10

Description: Failure to include missed monitored components in EIQ.

Viol. Classification: Minor

Rqmt Prov: PERMIT Title V O-02209

Description: Failure to include missed monitored components on Title V deviation report.

Notice of Intent Date: 01/25/2007 (541805)
Disclosure Date: 07/30/2007
Viol. Classification: Moderate
Citation: 30 TAC Chapter 115, SubChapter D 115.354(2)(C)
Description: Failure to monitor components.
Viol. Classification: Minor
Citation: 30 TAC Chapter 101, SubChapter A 101.10
Description: Failure to include missed monitored components in EIQ.
Viol. Classification: Minor
Rqmt Prov: PERMIT Title V O-02211
Description: Failure to include missed monitored components on Title V deviation report.

Notice of Intent Date: 01/25/2007 (541810)
Disclosure Date: 07/25/2007
Viol. Classification: Moderate
Citation: 30 TAC Chapter 115, SubChapter D 115.352(1)(A)
30 TAC Chapter 115, SubChapter D 115.354(2)(C)
30 TAC Chapter 115, SubChapter D 115.354(2)(D)
30 TAC Chapter 115, SubChapter H 115.781(f)
30 TAC Chapter 115, SubChapter H 115.789(1)
Description: Failure to monitor components under a prescribed LDAR program.
Viol. Classification: Minor
Citation: 30 TAC Chapter 101, SubChapter A 101.10
Description: Failure to include missed monitored components in EIQ.
Viol. Classification: Minor
Rqmt Prov: PERMIT Title V O-02311
Description: Failure to include missed monitored components on Title V deviation report.

Notice of Intent Date: 02/13/2007 (542642)
Disclosure Date: 07/30/2007
Viol. Classification: Moderate
Citation: 40 CFR Chapter 63, SubChapter C, PT 63, SubPT MMM 63.1362(c)(6)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT MMM 63.1363(c)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT MMM 63.1363(e)
Description: Failure to monitor components under a prescribe LDAR program.
Viol. Classification: Minor
Citation: 30 TAC Chapter 101, SubChapter A 101.10
Description: Failure to include missed monitored components EIQ.
Viol. Classification: Minor
Rqmt Prov: PERMIT Title V O-02205
Description: Failure to include missed monitored components on Title V deviation report.

Notice of Intent Date: 02/12/2007 (542650)
Disclosure Date: 07/14/2007
Viol. Classification: Moderate
Citation: 30 TAC Chapter 115, SubChapter D 115.354(2)(B)
30 TAC Chapter 115, SubChapter D 115.354(2)(C)
30 TAC Chapter 115, SubChapter D 115.354(2)(D)

40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.168(b)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.169(a)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.174(a)

Rqmt Prov: PERMIT NSR 2008

Description: Failure to monitor components under a prescribed LDAR program.

Viol. Classification: Minor

Citation: 30 TAC Chapter 101, SubChapter A 101.10

Description: Failure to include missed monitored components in Emissions Inventory.

Viol. Classification: Minor

Citation: 30 TAC Chapter 101, SubChapter A 101.10

Rqmt Prov: PERMIT O-02216

Description: Failure to include missed monitored components in Title V deviation report.

Notice of Intent Date: 02/26/2007 (554272)

Disclosure Date: 08/23/2007

Viol. Classification: Moderate

Citation: 30 TAC Chapter 115, SubChapter D 115.354(2)(B)

30 TAC Chapter 115, SubChapter D 115.354(2)(C)

40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.168(b)

40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.174(a)

Rqmt Prov: PERMIT NSR 4031

Description: Failure to monitor all valves, connectors, pumps, relief valves under a prescribed leak detection and repair program.

Viol. Classification: Minor

Citation: 30 TAC Chapter 101, SubChapter A 101.10

Description: Failure to report missed monitored components in emissions calculations.

Viol. Classification: Minor

Rqmt Prov: PERMIT O-02203

Description: Failure to include missed monitored components on Title V deviation report.

Notice of Intent Date: 02/26/2007 (554275)

Disclosure Date: 08/24/2007

Viol. Classification: Minor

Citation: 30 TAC Chapter 101, SubChapter A 101.10

Description: Failure to include missed monitored components in emissions calculations.

Viol. Classification: Minor

Citation: 2E THSC Chapter 101, SubChapter B 101.001

Rqmt Prov: PERMIT O-02204

Description: Failure to included missed monitored components on a Title V deviation report.

Notice of Intent Date: 04/02/2007 (557536)

Disclosure Date: 10/11/2007

Viol. Classification: Moderate

Citation: 30 TAC Chapter 115, SubChapter D 115.352(1)(A)

30 TAC Chapter 115, SubChapter D 115.352(1)(B)

30 TAC Chapter 115, SubChapter D 115.354(2)(C)

40 CFR Chapter 63, SubChapter C, PT 63, SubPT UU 63.1026(b)(2)(iii)

40 CFR Chapter 63, SubChapter C, PT 63, SubPT UU 63.1035

40 CFR Chapter 63, SubChapter C, PT 63, SubPT EEEE 63.2346

Rqmt Prov: PERMIT NSR Permit 18950
PERMIT NSR Permit 19720
PERMIT NSR Permit 19792
PERMIT NSR Permit 22070
PERMIT NSR Permit 22071
PERMIT NSR Permit 48892

Description: Failure to monitor several components in the Marine and Terminal Operations.

Viol. Classification: Minor
Citation: 30 TAC Chapter 101, SubChapter A 101.10

Description: Failure to included missed monitored components in EIQ.

Viol. Classification: Minor
Citation: 1 THC Chapter 1 1.001(a)
Rqmt Prov: PERMIT Title V Permit O-02217

Description: Failure to include missed monitored components on Title V Deviation Report.

Notice of Intent Date: 04/02/2007 (557539)
Disclosure Date: 07/25/2007

Viol. Classification: Moderate
Citation: 30 TAC Chapter 115, SubChapter D 115.352(1)(A)
30 TAC Chapter 115, SubChapter D 115.354(2)(B)
30 TAC Chapter 115, SubChapter D 115.354(2)(C)
30 TAC Chapter 115, SubChapter D 115.354(2)(D)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.163(b)(2)(i)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.168(b)
40 CFR Part 63, Subpart H 63.173
40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.174(a)

Rqmt Prov: PERMIT NSR 7531

Description: Failure to monitor all valves, connectors, relief valves, pumps and agitator.

Viol. Classification: Minor
Citation: 30 TAC Chapter 101, SubChapter A 101.10

Description: Failure to report missed monitored components in emissions calculations.

Viol. Classification: Minor
Rqmt Prov: PERMIT O-02210

Description: Failure to include missed monitored components in Title V deviation report.

Notice of Intent Date: 04/02/2007 (557547)
Disclosure Date: 10/11/2007

Viol. Classification: Moderate
Citation: 1 THC Chapter 1 1.001(a)
30 TAC Chapter 115, SubChapter B 115.132(a)
40 CFR Chapter 265, SubChapter I, PT 265, SubPT BB 265.1057(c)

Description: Failure to monitor components in B-52 Epoxy.

Viol. Classification: Minor
Citation: 30 TAC Chapter 101, SubChapter A 101.10

Description: Failure to include missed monitored components in EIQ.

Viol. Classification: Minor
Rqmt Prov: PERMIT Title V Operating Permit O-02207

Description: Failure to include missed monitored components in Title V report.

Notice of Intent Date: 04/18/2007 (558622)
No DOV Associated

Notice of Intent Date: 04/16/2007 (558628)
Disclosure Date: 11/04/2007

Viol. Classification: Moderate
Citation: 40 CFR Chapter 265, SubChapter I, PT 265, SubPT BB 265.1057(c)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT UU 63.1035(b)
Rqmt Prov: PERMIT NSR 1472

Description: Failure to monitor specific components.

Viol. Classification: Minor
Citation: 30 TAC Chapter 101, SubChapter A 101.10

Description: Failure to include missed monitored components on emissions inventory report.

Viol. Classification: Minor
Rqmt Prov: PERMIT O-2220

Description: Failure to include missed monitored components on emissions inventory report.

Notice of Intent Date: 04/19/2007 (558643)
No DOV Associated

Notice of Intent Date: 04/19/2007 (558652)
Disclosure Date: 04/24/2008

Viol. Classification: Moderate
Citation: 30 TAC Chapter 115, SubChapter D 115.354(2)(C)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT UU 63.1027(b)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT UU 63.1035(b)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT MMM 63.1363(b)(3)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT MMM 63.1363(e)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.168(b)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.174(a)

Description: Failure to monitor 49 valves, 186 connectors and 1 pump under a prescribed LDAR program.

Viol. Classification: Minor
Citation: 30 TAC Chapter 101, SubChapter A 101.10

Description: Failure to report missed monitored components in emissions calculations.

Viol. Classification: Minor
Rqmt Prov: PERMIT Title V Permit O-02211

Description: Failure to include missed monitored components in Title V deviation report.

Notice of Intent Date: 04/20/2007 (558658)
Disclosure Date: 11/16/2007

Viol. Classification: Moderate
Citation: 30 TAC Chapter 115, SubChapter D 115.354(2)(B)
30 TAC Chapter 115, SubChapter D 115.354(2)(C)
30 TAC Chapter 115, SubChapter D 115.354(2)(D)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.163(b)(2)(i)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.168(b)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.169(a)

40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.174(a)(1)

Description: Failure to monitor specific components.

Viol. Classification: Minor

Citation: 30 TAC Chapter 101, SubChapter A 101.10

Description: Failure to include missed monitored components in emissions inventory report.

Viol. Classification: Minor

Rqmt Prov: PERMIT O-2213

Description: Failure to include missed monitored components on Title V deviation report.

Notice of Intent Date: 04/18/2007 (558712)

Disclosure Date: 04/24/2008

Viol. Classification: Moderate

Citation: 30 TAC Chapter 115, SubChapter D 115.354(2)(C)

40 CFR Chapter 264, SubChapter I, PT 264, SubPT BB 264.1062(b)(3)

40 CFR Part 60, Subpart VV 60.482-8

40 CFR Chapter 61, SubChapter C, PT 61, SubPT V 61.243-2(b)(3)

40 CFR Chapter 61, SubChapter C, PT 61, SubPT FF 61.349(a)(1)(i)

40 CFR Chapter 63, SubChapter C, PT 63, SubPT MMM 63.1363(e)

40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.168(b)

Description: Failure to monitor 110 valves and 567 connectors under a prescribed LDAR program.

Viol. Classification: Minor

Citation: 30 TAC Chapter 101, SubChapter A 101.10

Description: Failure to report emission calculations for missed monitored components.

Viol. Classification: Minor

Rqmt Prov: PERMIT Title V Permit O-02211

Description: Failure to include missed monitored components in Title V deviation reports.

Notice of Intent Date: 04/20/2007 (558725)

Disclosure Date: 11/16/2007

Viol. Classification: Moderate

Citation: 30 TAC Chapter 115, SubChapter D 115.354(2)(B)

30 TAC Chapter 115, SubChapter D 115.354(2)(C)

30 TAC Chapter 115, SubChapter D 115.354(2)(D)

30 TAC Chapter 115, SubChapter H 115.781(b)

30 TAC Chapter 115, SubChapter H 115.781(b)(8)

30 TAC Chapter 115, SubChapter H 115.781(f)

Description: Failure to monitor specific components under a prescribed Leak Detection and Repair Program.

Viol. Classification: Minor

Citation: 30 TAC Chapter 101, SubChapter A 101.10

Description: Failure to report emission calculations for missed monitored components.

Viol. Classification: Minor

Rqmt Prov: PERMIT O-2213

Description: Failure to include missed monitored components in Title V deviation report.

Notice of Intent Date: 04/18/2007 (558733)

Disclosure Date: 04/24/2008

Viol. Classification: Moderate

Citation: 30 TAC Chapter 115, SubChapter D 115.354(2)(C)

40 CFR Part 60, Subpart VV 60.482-8
40 CFR Chapter 61, SubChapter C, PT 61, SubPT FF 61.349(a)(1)(i)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.168(b)

Rqmt Prov: PERMIT NSR 46428

Description: Failure to monitor 42 valves and 291 connectors under a prescribed LDAR program.

Viol. Classification: Moderate

Citation: 30 TAC Chapter 101, SubChapter A 101.10

Description: Failure to report emissions calculations for missed monitored components.

Viol. Classification: Minor

Rqmt Prov: PERMIT Title V Permit O-02211

Description: Failure to include missed monitored components in Title V deviation report.

Notice of Intent Date: 10/02/2007 (598845)

No DOV Associated

Notice of Intent Date: 10/25/2007 (600864)

No DOV Associated

Notice of Intent Date: 10/25/2007 (600866)

No DOV Associated

Notice of Intent Date: 04/29/2008 (681813)

No DOV Associated

Notice of Intent Date: 07/02/2008 (114194)

No DOV Associated

Notice of Intent Date: 09/02/2008 (706228)

No DOV Associated

Notice of Intent Date: 10/24/2008 (707543)

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



IN THE MATTER OF AN
ENFORCEMENT ACTION
CONCERNING
THE DOW CHEMICAL COMPANY
RN100225945

§
§
§
§
§

BEFORE THE
TEXAS COMMISSION ON
ENVIRONMENTAL QUALITY

AGREED ORDER
DOCKET NO. 2008-1723-AIR-E

At its _____ agenda, the Texas Commission on Environmental Quality (“the Commission” or “TCEQ”) considered this agreement of the parties, resolving an enforcement action regarding The Dow 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 presented this agreement to the Commission.

The Respondent understands that it has certain procedural rights at certain points in the enforcement process, including, but not limited to, the right to formal notice of violations, notice of an evidentiary hearing, the right to an evidentiary hearing, and a right to appeal. By entering into this Agreed Order, the Respondent agrees to waive all notice and procedural rights.

It is further understood and agreed that this Order represents the complete and fully-integrated settlement of the parties. 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. The duties and responsibilities imposed by this Agreed Order are binding upon the Respondent.

The Commission makes the following Findings of Fact and Conclusions of Law:

I. FINDINGS OF FACT

1. The Respondent owns and operates a chemical manufacturing plant at 2301 North Brazosport Boulevard in Freeport, Brazoria County, Texas (the “Plant”).

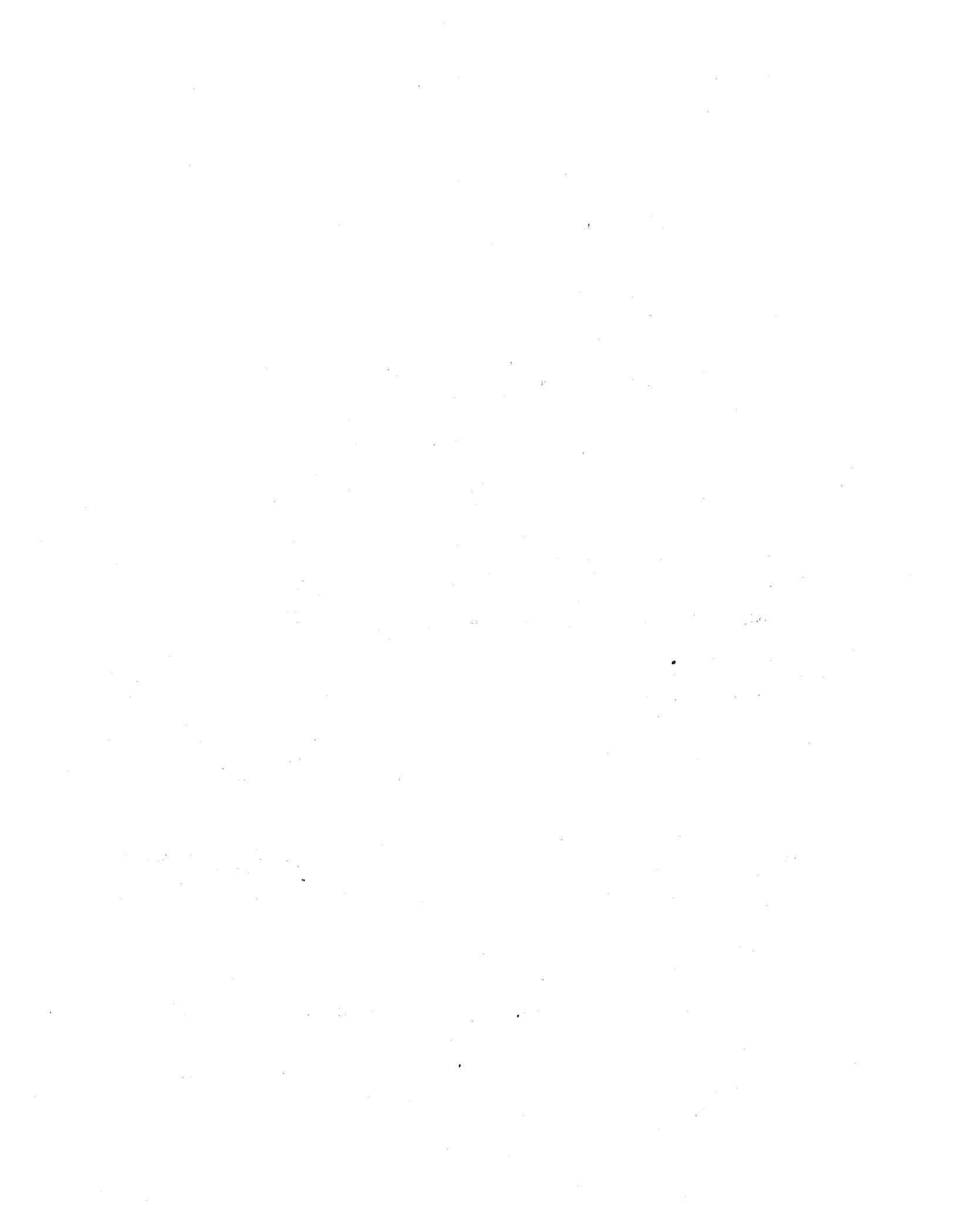
2. The Plant consists of one or more sources as defined in TEX. HEALTH & SAFETY CODE § 382.003(12).
3. During an investigation on December 17, 2007, TCEQ staff documented the unauthorized release of 11,562 pounds ("lbs") of ethylene from an unlit flare, flare header safety valve, KO132 safety valve, light hydrocarbon recycle line safety valve and Train 1 vent valves when the Respondent failed to ensure that the two oil flow switches were working correctly prior to using Compressor A and B in the Polyethylene 4 Unit. A broken paddle in each of the two oil flow switches led to a sequence of events which extinguished both the flare and the flare pilots, resulting in an excessive emissions event which began on December 1, 2007, and lasted for three hours and 29 minutes (Incident No. 100717).
4. During an investigation on July 16, 2008, TCEQ staff documented the unauthorized release of 1,064 lbs of ethylene, one lb of benzene, one lb of 1,3-butadiene, 770 lbs of carbon monoxide ("CO"), 107 lbs of nitrogen oxides ("NOx") and nine lbs of other chemicals when the Respondent failed to reduce high cycle bending fatigue caused by vibration and by over tightening the fitting on the tubing, leading to tubing failure in the Light Hydrocarbon 7 Unit, resulting in an emissions event which began on June 28, 2008, and lasted for two hours (Incident No. 110326).
5. During an investigation on September 22, 2008, TCEQ staff documented the unauthorized release of 1,244 lbs of ethylene when the Respondent failed to ascertain the condition of the bracing for a valve position indicator; vibration had caused the bracing bolts to become loose resulting in a valve position indicator failure of the Program 3 Valve on Train 1 of the Polyethylene 4 Reactor, resulting in an emissions event which began on August 2, 2008, and lasted for one minute (Incident No. 111947).
6. During an investigation on August 20, 2008, TCEQ staff documented the unauthorized release of 757.9 lbs of ethylene oxide from the Wastewater Treatment Plant THROX, R-100 Reactor and R-110 Reactor, when the Respondent failed to close a valve on a washout line, resulting in an emissions event which began on July 8, 2008, and lasted for 101 hours (Incident No. 110793).
7. During an investigation on April 7, 2008, TCEQ staff documented the unauthorized release of 86 lbs of acetylene, 12,491 lbs of ethylene, 2,923 lbs of ethane, 12,226 lbs of propylene, 5,859 lbs of propane, 1,088 lbs of 1,3 butadiene, 91 lbs of cis 2-butene, 29,563 lbs of CO, 4,093 lbs of NOx, 81 lbs of isobutane, 235 lbs of n-butane, 352 lbs of trans 2-butene, 1,474 lbs of benzene, 2,337 lbs of toluene, 302 lbs of hexane, 452 lbs of isobutylene, 529 lbs of isopentane, 716 lbs of n-pentane and 331 lbs of 1-butene from Elevated Flare (F1) and Ground Flare (F1000) in the Light Hydrocarbon 8 Unit when the Respondent failed to prevent a system overload which led to the trip of two compressors during a start-up activity, resulting in an excessive emissions event which began on March 4, 2008, and lasted for 29 hours and 58 minutes (Incident No. 104580).
8. The Respondent received notices of the violations on September 2, September 4, November 7, November 14, and November 17, 2008.
9. The Executive Director recognizes that the Respondent has implemented the following corrective measures at the Plant:

- a. On December 7, 2007, the valve supplying methane to the flare pilots was changed from an automated fail-closed valve to a manual valve to ensure that the valve is not affected by instrument air losses in the future (Incident No. 100717);
- b. On January 31, 2008, a daily inspection of the backup air supply system was added to the daily inspection sheet and low oil flow switches on the air compressors were added to a preventative maintenance schedule to be inspected annually and replaced as needed (Incident No. 100717);
- c. On September 3, 2008, the valve supplying steam to the flare was changed to a fail-close valve instead of fail-open to prevent excessive steam at the flare due to loss of instrument air (Incident No. 100717);
- d. On November 18, 2008, the corrective action plan ("CAP") was approved by the TCEQ, but all the corrective actions in the CAP had been completed on September 3, 2008 (Incident No. 100717);
- e. On June 28, 2008, the broken tubing connection on the control valve was replaced and bracing was added to reduce vibration until further analysis could be completed (Incident No. 110326);
- f. On August 4, 2008, metallurgical analysis was completed on the failed tubing to determine the cause of the failure. The root cause was found to be vibration and the over tightening of the tubing connection which accelerated the failure (Incident No. 110326);
- g. On August 18, 2008, the Light Hydrocarbon 7 Unit was surveyed for similar tubing connections and any potential vibration concerns (Incident No. 110326);
- h. On August 22, 2008, training and procedures were developed and put in place for tubing installation (Incident No. 110326);
- i. On December 23, 2008, the upgrade of air supply installations to valves was completed (Incident No. 110326);
- j. On September 3, 2008, set-up an electronic preventative maintenance schedule concerning the bracing of the control valve. The automated program will generate a work order to torque the bracing bolts associated with the reactor pressure control valve on annual frequency (Incident No. 111947);
- k. On September 19, 2008, modified its "Shutdown and De-pressure Procedure" to include a step to inspect the reactor pressure control valve bracing for each shutdown where the reactor is depressurized completely (Incident No. 111947);
- l. On September 9, 2008, an incoming ethylene oxide raw material balance alarm was added to the process control code (Incident No. 110793);

- m. On September 25, 2008, the ethylene oxide pump clearing procedure was modified to provide more details on the operation of the valves around the pumps and to address the use of flex hoses (Incident No. 110793);
- n. On September 27, 2008, the pump hard pipe connections that were connected to the wastewater treatment plant header were removed (Incident No. 110793); and
- o. On January 6, 2009, the Respondent submitted the CAP to the TCEQ for Incident No. 104580. The CAP was approved on January 28, 2009, and corrective actions required by the CAP were also completed by that date.

II. CONCLUSIONS OF LAW

1. The Respondent is subject to the jurisdiction of the TCEQ pursuant to TEX. HEALTH & SAFETY CODE ch. 382 and TEX. WATER CODE ch. 7 and the rules of the Commission.
2. As evidenced by Findings of Fact No. 3, the Respondent failed to prevent unauthorized emissions and to operate a flare with a flame or pilot flame present, in violation of 30 TEX. ADMIN. CODE §§ 116.115(c), 101.20(1) and 101.221(a), Air Permit No. 834, Special Condition No. 1, 40 CODE OF FEDERAL REGULATIONS ("CFR") § 60.18(c), and TEX. HEALTH & SAFETY CODE § 382.085(b). Since the emissions event was avoidable by better operations practices, the demonstrations in 30 TEX. ADMIN. CODE § 101.222 necessary to present an affirmative defense were not met.
3. As evidenced by Findings of Fact No. 4, the Respondent failed to prevent unauthorized emissions, in violation of 30 TEX. ADMIN. CODE § 116.715(a), Air Permit No. 20432, Special Condition Chapter III-1 and TEX. HEALTH & SAFETY CODE § 382.085(b). Since the emissions event was avoidable and could have been prevented by better operations practices, the demonstrations in 30 TEX. ADMIN. CODE § 101.222 necessary to present an affirmative defense were not met.
4. As evidenced by Findings of Fact No. 5, the Respondent failed to prevent unauthorized emissions, in violation of 30 TEX. ADMIN. CODE § 116.115(c), Air Permit No. 834, Special Condition No. 1 and TEX. HEALTH & SAFETY CODE § 382.085(b). Since the emissions event was avoidable by better operations practices, the demonstrations in 30 TEX. ADMIN. CODE § 101.222 necessary to present an affirmative defense were not met.
5. As evidenced by Findings of Fact No. 6, the Respondent failed to prevent unauthorized emissions, in violation of 30 TEX. ADMIN. CODE § 116.115(c), Air Permit No. 20909, Special Condition No. 1 and TEX. HEALTH & SAFETY CODE § 382.085(b). Since the emissions event was avoidable by better operations practices, the demonstrations in 30 TEX. ADMIN. CODE § 101.222 necessary to present an affirmative defense were not met.
6. As evidenced by Findings of Fact No. 7, the Respondent failed to prevent unauthorized emissions, in violation of 30 TEX. ADMIN. CODE § 116.715(a), Air Permit No. 20432, Special Condition Chapter III-1 and TEX. HEALTH & SAFETY CODE § 382.085(b). Since the emissions



event was avoidable by better operations practices, the demonstrations in 30 TEX. ADMIN. CODE § 101.222 necessary to present an affirmative defense were not met.

7. Pursuant to TEX. WATER CODE § 7.051, the Commission has the authority to assess an administrative penalty against the Respondent for violations of the Texas Water Code and the Texas Health and Safety Code within the Commission's jurisdiction; for violations of rules adopted under such statutes; or for violations of orders or permits issued under such statutes.
8. An administrative penalty in the amount of Sixty-Three Thousand Dollars (\$63,000) is justified by the facts recited in this Agreed Order, and considered in light of the factors set forth in TEX. WATER CODE § 7.053. The Respondent has paid Thirty-One Thousand Five Hundred Dollars (\$31,500) of the administrative penalty. Thirty-One Thousand Five Hundred Dollars (\$31,500) shall be conditionally offset by the Respondent's completion of a Supplemental Environmental Project ("SEP").

III. ORDERING PROVISIONS

NOW, THEREFORE, THE TEXAS COMMISSION ON ENVIRONMENTAL QUALITY ORDERS that:

1. The Respondent is assessed an administrative penalty in the amount of Sixty-Three Thousand Dollars (\$63,000) as set forth in Section II, Paragraph 8 above, for violations of TCEQ rules and state statutes. The payment of this administrative penalty and the Respondent's compliance with all the terms and conditions set forth in this Agreed Order completely resolve the violations set forth by this Agreed Order in this action. However, the Commission shall not be constrained in any manner from requiring corrective actions or penalties for other violations that are not raised here. Administrative penalty payments shall be made payable to "TCEQ" and shall be sent with the notation "Re: The Dow Chemical Company, Docket No. 2008-1723-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. The Respondent shall implement and complete a SEP in accordance with TEX. WATER CODE § 7.067. As set forth in Section II, Paragraph 8 above, Thirty-One Thousand Five Hundred Dollars (\$31,500) of the assessed administrative penalty shall be offset with the condition that the Respondent implement the SEP defined in Attachment A, incorporated herein by reference. The Respondent's obligation to pay the conditionally offset portion of the administrative penalty assessed shall be discharged upon final completion of all provisions of the SEP agreement.

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. The Executive Director may refer this matter to the Office of the Attorney General of the State of Texas ("OAG") for further enforcement proceedings without notice to the Respondent if the Executive Director determines that the Respondent has not complied with one or more of the terms or conditions in this Agreed Order.
7. 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.
8. 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.
9. This Agreed Order may be executed in multiple counterparts, which together shall constitute a single original instrument. Any executed signature page to this Agreed Order may be transmitted by facsimile transmission to the other parties, which shall constitute an original signature for all purposes under this Agreed Order.
10. The Chief Clerk shall provide a copy of this Agreed Order to each of the parties. By law, the effective date of this Agreed Order is the third day after the mailing date, as provided by 30 TEX. ADMIN. CODE § 70.10(b) and TEX. GOV'T CODE § 2001.142.

SIGNATURE PAGE

TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

For the Commission



For the Executive Director

Date 6/5/2009

I, the undersigned, have read and understand the attached Agreed Order in the matter of The Dow Chemical Company. I am authorized to agree to the attached Agreed Order on behalf of The Dow Chemical Company, and do agree to the specified terms and conditions. I further acknowledge that the TCEQ, in accepting payment for the penalty amount, is materially relying on such representation.

I understand that by entering into this Agreed Order, The Dow Chemical Company waives certain procedural rights, including, but not limited to, the right to formal notice of violations addressed by this Agreed Order, notice of an evidentiary hearing, the right to an evidentiary hearing, and the right to appeal. I agree to the terms of the Agreed Order in lieu of an evidentiary hearing. This Agreed Order constitutes full and final adjudication by the Commission of the violations set forth in this Agreed Order.

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

Date 3/23/2009

LAURA AMBROSE
Name (Printed or typed)
Authorized Representative of
The Dow Chemical Company

RESPONSIBLE CARE LEADER
Title

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.

Attachment A
Docket Number: 2008-1723-AIR-E

SUPPLEMENTAL ENVIRONMENTAL PROJECT

Respondent: The Dow Chemical Company

Payable Penalty Amount: Sixty-Three Thousand Dollars (\$63,000)

SEP Amount: Thirty-One Thousand Five Hundred Dollars (\$31,500)

Type of SEP: Pre-approved

Third-Party Recipient: Houston-Galveston AERCO's Clean Cities/Clean Vehicles Program

Location of SEP: Brazoria County

The Texas Commission on Environmental Quality ("TCEQ") agrees to offset a portion of the administrative Penalty Amount assessed in this Agreed Order for the Respondent to contribute to a Supplemental Environmental Project ("SEP"). The offset is equal to the SEP Amount set forth above and is conditioned upon completion of the project in accordance with the terms of this Attachment A.

1. Project Description

A. Project

The Respondent will contribute to Houston-Galveston AERCO's Clean Cities/Clean Vehicles Program in Brazoria County. The contribution will be used in accordance with the *Supplemental Environmental Project Agreement between the Houston-Galveston AERCO and the Texas Commission on Environmental Quality*. SEP monies will be used to aid local school districts and area transit agencies in reaching local match requirements mandated by the Federal Highway Administration's ("FHWA") Congestion Mitigation/Air Quality funding program. SEP monies will be disbursed to school districts and transit agencies in need of funding assistance in the Houston-Galveston non-attainment area. Those SEP monies will be used exclusively by the school districts and transit agencies as supplements to meet the local match requirements of the EPA. SEP monies will be used to pay for the cost of replacing older diesel buses with alternative fueled or clean diesel buses. The old buses will be permanently retired and only sold for scrap. The schools and transit agencies will also use the SEP monies to retrofit more buses to reduce emissions. Houston-Galveston AERCO will send the TCEQ verification in the form of paid invoices and other documentation to show that the retrofits were completed. Retrofit technologies include particulate matter traps, diesel particulate matter filters, NOx reduction catalyst technology in combination with diesel particulate filters, and other emission control technologies that are developed and approved by EPA or the California Air Resources Board.

The Respondent certifies that there is no prior commitment to do this project and that it is being performed solely in an effort to settle this enforcement action.

B. Environmental Benefit

This SEP will provide a discernible environmental benefit by reducing particulate emissions on buses by more than 90% below today's level and reducing hydrocarbons below measurement capability.

C. Minimum Expenditure

The Respondent shall contribute at least the SEP Amount to the Third-Party Recipient and comply with all other provisions of this SEP.

2. Performance Schedule

Within 30 days after the effective date of this Agreed Order, the Respondent must contribute the SEP Amount to the Third-Party Recipient. The Respondent shall mail the contribution, with a copy of the Agreed Order, to:

Houston-Galveston Area Council
Houston-Galveston AERCO
P.O. Box 22777
Houston, Texas 77227-2777

3. Records and Reporting

Concurrent with the payment of the SEP Amount, the Respondent shall provide the TCEQ SEP Coordinator with a copy of the check and transmittal letter indicating full payment of the SEP Amount to the Third-Party Recipient. The Respondent shall mail a copy of the check and transmittal letter to:

Enforcement Division
Attention: SEP Coordinator, MC 219
Texas Commission on Environmental Quality
P.O. Box 13087
Austin, Texas 78711-3087

4. Failure to Fully Perform

If the Respondent does not perform its obligations under this SEP in any way, including full payment of the SEP Amount and submittal of the required reporting described in Section 3 above, the Executive Director may require immediate payment of all or part of the SEP Amount.

The check for any amount due shall be made out to ATexas Commission on Environmental Quality@ and mailed to:

Litigation Division
Attention: SEP Coordinator, MC 175
Texas Commission on Environmental Quality
P.O. Box 13088
Austin, Texas 78711-3088

The Respondent shall also mail a copy of the check to the TCEQ SEP Coordinator at the address in Section 3 above.

5. Publicity

Any public statements concerning this SEP made by or on behalf of the Respondent must include a clear statement that the project was performed as part of the settlement of an enforcement action brought by the TCEQ. Such statements include advertising, public relations, and press releases.

6. Clean Texas Program

The Respondent shall not include this SEP in any application made to TCEQ under the "Clean Texas" (or any successor) program(s). Similarly, the Respondent may not seek recognition for this contribution in any other state or federal regulatory program.

7. Other SEPs by TCEQ or Other Agencies

The SEP identified in this Agreed Order has not been, and shall not be, included as an SEP for the Respondent under any other Agreed Order negotiated with the TCEQ or any other agency of the state or federal government.

