

EXECUTIVE SUMMARY - ENFORCEMENT MATTER Page 1 of 4
DOCKET NO.: 2009-1593-AIR-E **TCEQ ID:** RN100542281 **CASE NO.:** 38455
RESPONDENT NAME: Equistar Chemicals, LP

ORDER TYPE:		
<input checked="" type="checkbox"/> 1660 AGREED ORDER	<input type="checkbox"/> FINDINGS AGREED ORDER	<input type="checkbox"/> FINDINGS ORDER FOLLOWING SOAH HEARING
<input type="checkbox"/> FINDINGS DEFAULT ORDER	<input type="checkbox"/> SHUTDOWN ORDER	<input type="checkbox"/> IMMINENT AND SUBSTANTIAL ENDANGERMENT ORDER
<input type="checkbox"/> AMENDED ORDER	<input type="checkbox"/> EMERGENCY ORDER	
CASE TYPE:		
<input checked="" type="checkbox"/> AIR	<input type="checkbox"/> MULTI-MEDIA (check all that apply)	<input type="checkbox"/> INDUSTRIAL AND HAZARDOUS WASTE
<input type="checkbox"/> PUBLIC WATER SUPPLY	<input type="checkbox"/> PETROLEUM STORAGE TANKS	<input type="checkbox"/> OCCUPATIONAL CERTIFICATION
<input type="checkbox"/> WATER QUALITY	<input type="checkbox"/> SEWAGE SLUDGE	<input type="checkbox"/> UNDERGROUND INJECTION CONTROL
<input type="checkbox"/> MUNICIPAL SOLID WASTE	<input type="checkbox"/> RADIOACTIVE WASTE	<input type="checkbox"/> DRY CLEANER REGISTRATION
<p>SITE WHERE VIOLATION(S) OCCURRED: Channelview Complex, 8280 Sheldon Road, Channelview, Harris County</p> <p>TYPE OF OPERATION: Chemical company</p> <p>SMALL BUSINESS: <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p>OTHER SIGNIFICANT MATTERS: There are no complaints. There are three additional pending enforcement actions regarding this facility location, Docket Nos. 2010-0335-AIR-E, 2010-0243-IHW-E, and 2009-0263-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 17, 2010. No comments were received.</p> <p>CONTACTS AND MAILING LIST: TCEQ Attorney/SEP Coordinator: None TCEQ Enforcement Coordinator: Mr. John Muennink, Enforcement Division, Enforcement Team 5, MC R-14, (361) 825-3423; Ms. Laurie Eaves, Enforcement Division, MC 219, (512) 239-4495 Respondent: Mr. Don Holloway, Environmental Superintendent, Equistar Chemicals, LP, P.O. Box 777, Channelview, Texas 77530-0777 Mr. Michael VanDerSnick, Site Manager, Equistar Chemicals, LP, P.O. Box 777, Channelview, Texas 77530-0777 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 checked="" type="checkbox"/> Records Review</p> <p>Date(s) of Complaints Relating to this Case: None</p> <p>Date of Investigation Relating to this Case: January 9, February 17 through 23, May 4 through 28, July 9, July 14, and July 16, 2009</p> <p>Date of NOV/NOE Relating to this Case: February 6, April 22, May 15, July 17, July 28, August 7, and September 15, 2009 (NOE)</p> <p>Background Facts: These were routine investigations and record reviews.</p> <p>AIR</p> <p>1) Failure to prevent unauthorized emissions. Specifically, the Respondent released 4,371 pounds ("lbs") of volatile organic compounds ("VOC"), including 1,970 lbs of the Hazardous Air Pollutant ("HAP") 1,3-butadiene from Tank 6 in the East Plant Tank Farm during an avoidable emissions event (Incident No. 125702) that began June 17, 2009 and lasted four minutes. A two inch vent nozzle became plugged resulting in an increase in pressure in Tank 6. The Respondent was unable to detect the rise in pressure in Tank 6 until a pressure safety valve released the emissions to the atmosphere. Since this emissions event could have been avoided by better maintenance practices and the final report was incomplete, 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), TEX. HEALTH & SAFETY CODE § 382.085(b), and Permit No. 2128, Special Condition No. 1].</p> <p>2) Failure to submit an administratively complete and accurate final report for Incident No. 125702. Specifically, the final report submitted on June 30, 2009 did not include the permit number for the facility that experienced the upset [30 TEX. ADMIN.</p>	<p>Total Assessed: \$111,855</p> <p>Total Deferred: \$22,370 <input checked="" type="checkbox"/> Expedited Settlement <input type="checkbox"/> Financial Inability to Pay</p> <p>SEP Conditional Offset: \$0</p> <p>Total Paid to General Revenue: \$0</p> <p>On or about January 6, 2009, the Respondent filed a petition for bankruptcy relief pursuant to Chapter 11 of the United States Code now pending in the U.S. Bankruptcy Court.</p> <p>(The remaining \$89,485 due pending the outcome of bankruptcy proceedings)</p> <p>Site Compliance History Classification <input checked="" type="checkbox"/> High <input type="checkbox"/> Average <input type="checkbox"/> Poor</p> <p>Site Compliance History Classification <input type="checkbox"/> High <input checked="" type="checkbox"/> Average <input type="checkbox"/> Poor</p> <p>Person Compliance History Classification <input type="checkbox"/> High <input checked="" type="checkbox"/> Average <input type="checkbox"/> Poor</p> <p>Major Source: <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Applicable Penalty Policy: September 2002</p>	<p>Ordering Provisions:</p> <p>The Order will require the Respondent to:</p> <p>a. Within 30 days after the effective date of this Agreed Order:</p> <p>i. Implement measures designed to ensure the proper maintenance of vent lines and nozzles in order to prevent the reoccurrence of emissions due to the same causes as that of Incident No. 125702;</p> <p>ii. Implement a proper training program for operators in the event of upset conditions in order to prevent the reoccurrence of emissions due to the same causes as that of Incident No. 122734;</p> <p>iii. Implement measures designed to ensure that proper thermal expansion relief and new gaskets are in place when isolating liquid filled lines nozzles in order to prevent the reoccurrence of emissions due to the same causes as that of Incident No. 118631;</p> <p>iv. Implement measures designed to prevent tubes in the compressor from plugging when changing filters and causing the compressor to shutdown due to a loss of steam in order to prevent the reoccurrence of emissions due to the same causes as that of Incident No. 118546;</p> <p>v. Install bolts or fasteners on the covers of the roof openings of Tanks 3111A, 3111B, and 3113; and</p> <p>vi. Implement measures designed to ensure the proper reporting of emissions events.</p> <p>b. Within 45 days after the effective date of this Agreed Order, submit written certification to demonstrate compliance with Ordering Provision a.</p> <p>c. Within 180 days after the effective date of this Agreed Order:</p> <p>i. Install a thermal oxidizer to minimize emissions from the Regeneration Vent; and</p>

<p>CODE § 101.201(b)(1)(H) and TEX. HEALTH & SAFETY CODE § 382.085(b)].</p> <p>3) Failure to prevent unauthorized emissions. Specifically, the Respondent released 967.37 lbs of carbon monoxide ("CO"), 612 lbs of the highly reactive VOC ("HRVOC") ethylene, and 93.2 lbs of nitrogen oxides ("NOx") during an avoidable emissions event (Incident No. 122734) that began April 13, 2009 and lasted six hours. The deethanizer pressure control valve ("DPCV"), PV-46060, failed to control the tower pressure during an acetylene converter upset and operators were not trained to put the DPCV, PV-46011, in manual mode and close it before reestablishing air to the valve. Since this emissions event could have been avoided by better operational 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), TEX. HEALTH & SAFETY CODE § 382.085(b), and Permit No. 2933, Special Condition No. 1].</p> <p>4) Failure to prevent unauthorized emissions. Specifically, the Respondent released 6,876 lbs of VOCs, including 3,414 lbs of HRVOCs, from Vessel D-1217 in the Methyl Tertiary Butyl Ether Unit during an avoidable emissions event (Incident No. 118631) that began January 8, 2009 and lasted one hour and 30 minutes. The emissions were the result of a liquid filled line being isolated on both ends without proper thermal expansion relief and with used gaskets. Since this emissions event could have been avoided by better operational and maintenance 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), TEX. HEALTH & SAFETY CODE § 382.085(b), and Permit No. 6387, Special Condition No. 3].</p> <p>5) Failure to prevent unauthorized emissions and exceeded the 1,200 lbs per hour ("lbs/hr") emission limit for HRVOCs. Specifically, the Respondent released 6,133 lbs of VOCs, including 5,611 lbs of HRVOCs, 5,502 lbs of CO, and 642 lbs of NOx from the OP1 Flare, emission point number ("EPN") 38E01, in the Olefins 1 Unit during an avoidable emissions event (Incident No. 118546) that began January 7, 2009 and lasted three hours and 50 minutes. The emissions were the result of the plugging of a tube in the compressor and a subsequent loss of steam that caused the compressor to shutdown and the OP1 Flare to vent. Since</p>		<p>ii. Obtain a permit amendment to Permit No. 2128 that amends the emission limits to more accurately reflect operation of the Reactors associated to the Regeneration Vent.</p> <p>d. Within 195 days after the effective date of this Agreed Order, submit written certification to demonstrate compliance with Ordering Provision c.</p>
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this emissions event could have been avoided by better maintenance and operational practices and was improperly reported, the demonstrations in 30 TEX. ADMIN. CODE § 101.222 necessary to present an affirmative defense were not met [30 TEX. ADMIN. CODE §§ 115.722(c)(2) and 116.115(c), TEX. HEALTH & SAFETY CODE § 382.085(b) and Permit No. 1768, Special Condition No. 1].

6) Failure to report the estimated total quantities for the compounds released during Incident No. 118546 in the final emissions event report. Specifically, the Respondent reported only the amount of contaminants that were over the permitted limit, instead of the total amount of contaminants emitted [30 TEX. ADMIN. CODE § 101.201(b)(1)(H) and TEX. HEALTH & SAFETY CODE § 382.085(b)].

7) Failure to comply with the hourly emission limit of 1.65 lbs/hr for VOCs and 0.14 lbs/hr for 1,3 butadiene intermittently from January 6, 2009 (the date the bankruptcy petition was filed) to present. Specifically, emissions from Regeneration Vent, EPN 3E05, for Reactors R-309 A, R-309 B, and R-309 C, exceeded permitted limits as documented by the results of sampling conducted for six one-hour samples per reactor on December 11 through 12, 2005 and December 31, 2005 and an update provided on May 26, 2009 that emission exceedances are ongoing. Rates ranged from 1.76 lbs/hr to 9.28 lbs/hr of VOCs over 35 hours and 0.16 lbs/hr to 0.31 lbs/hr of 1,3 butadiene over 27 hours and total emissions through May 26, 2009 were reported to be 7,236 lbs of VOCs and 64.7 lbs of 1,3 butadiene [30 TEX. ADMIN. CODE §§ 116.115(c) and 122.143(4), TEX. HEALTH & SAFETY CODE § 382.085(b), Federal Operating Permit ("FOP") No. O-02184, Special Condition No. 18 and Permit No. 2128, Special Condition No. 1].

8) Failure to equip the gauge float wells with bolts or fasteners on the covers of the roof openings of Tanks 3111A, 3111B, and 3113, to ensure that the openings are air tight [30 TEX. ADMIN. CODE § 122.143(4), TEX. HEALTH & SAFETY CODE § 382.085(b), FOP No. O-02182, Special Condition No. 1.A., and 40 CODE OF FEDERAL REGULATIONS § 63.119(b)(6)].



Penalty Calculation Worksheet (PCW)

Policy Revision 2 (September 2002)

PCW Revision October 30, 2008

TCEQ

DATES	Assigned 10-Aug-2009	Screening 19-Aug-2009	EPA Due 4-May-2010
	PCW: 6-Jan-2010		

RESPONDENT/FACILITY INFORMATION	
Respondent	Equistar Chemicals, LP
Reg. Ent. Ref. No.	RN100542281
Facility/Site Region	12-Houston
Major/Minor Source	Major

CASE INFORMATION			
Enf./Case ID No.	38455	No. of Violations	1
Docket No.	2009-1593-AIR-E	Order Type	1660
Media Program(s)	Air	Government/Non-Profit	No
Multi-Media		Enf. Coordinator	John Muennink
		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**

ADJUSTMENTS (+/-) TO SUBTOTAL 1

Subtotals 2-7 are obtained by multiplying the Total Base Penalty (Subtotal 1) by the indicated percentage.

Compliance History **Subtotals 2, 3, & 7**

Notes:

Culpability **Subtotal 4**

Notes:

Good Faith Effort to Comply Total Adjustments **Subtotal 5**

Economic Benefit **Subtotal 6**

Total EB Amounts ***Capped at the Total EB \$ Amount**
Approx. Cost of Compliance

SUM OF SUBTOTALS 1-7 **Final Subtotal**

OTHER FACTORS AS JUSTICE MAY REQUIRE **Adjustment**

Reduces or enhances the Final Subtotal by the indicated percentage.

Notes:

Final Penalty Amount

STATUTORY LIMIT ADJUSTMENT **Final Assessed Penalty**

DEFERRAL **Reduction Adjustment**

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

Notes:

PAYABLE PENALTY

Screening Date 19-Aug-2009

Docket No. 2009-1593-AIR-E

PCW

Respondent Equistar Chemicals, LP

Policy Revision 2 (September 2002)

Case ID No. 38455

PCW Revision October 30, 2008

Reg. Ent. Reference No. RN100542281

Media [Statute] Air

Enf. Coordinator John Muennink

Compliance History Worksheet

>> Compliance History Site Enhancement (Subtotal 2)

Component	Number of...	Enter Number Here	Adjust.
NOVs	Written NOVs with same or similar violations as those in the current enforcement action (number of NOVs meeting criteria)	37	185%
	Other written NOVs	32	64%
Orders	Any agreed final enforcement orders containing a denial of liability (number of orders meeting criteria)	1	20%
	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	2	50%
Judgments and Consent Decrees	Any non-adjudicated final court judgments or consent decrees containing a denial of liability of this state or the federal government (number of judgements or consent decrees meeting criteria)	2	60%
	Any adjudicated final court judgments and default judgments, or non-adjudicated final court judgments or consent decrees without a denial of liability, of this state or the federal government	0	0%
Convictions	Any criminal convictions of this state or the federal government (number of counts)	0	0%
Emissions	Chronic excessive emissions events (number of events)	0	0%
Audits	Letters notifying the executive director of an intended audit conducted under the Texas Environmental, Health, and Safety Audit Privilege Act, 74th Legislature, 1995 (number of audits for which notices were submitted)	12	-12%
	Disclosures of violations under the Texas Environmental, Health, and Safety Audit Privilege Act, 74th Legislature, 1995 (number of audits for which violations were disclosed)	4	-8%
<i>Please Enter Yes or No</i>			
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) 359%

>> 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 37 NOVs issued for same or similar violations, 32 NOVs issued for unrelated violations, one agreed order with a denial of liability, two agreed orders without a denial of liability, and two court orders with a denial of liability. Penalty reduction due to 12 notice of audit letters and 4 violation disclosures submitted.

Total Adjustment Percentage (Subtotals 2, 3, & 7) 359%

Screening Date 19-Aug-2009	Docket No. 2009-1593-AIR-E	PCW	
Respondent Equistar Chemicals, LP	<small>Policy Revision 2 (September 2002)</small>		
Case ID No. 38455	<small>PCW Revision October 30, 2009</small>		
Reg. Ent. Reference No. RN100542281			
Media [Statute] Air			
Enf. Coordinator John Muennink			
Violation Number 1			
Rule Cite(s)	30 Tex. Admin. Code § 116.115(c), Tex. Health & Safety Code § 382.085(b), Permit No. 2933, Special Condition No. 1		
Violation Description	Failed to prevent unauthorized emissions. Specifically, the Respondent released 967.97 lbs of carbon monoxide, 612 lbs of the highly reactive volatile organic compound ethylene, and 93.2 lbs of nitrogen oxides during an avoidable emissions event (Incident No. 122734) that began April 13, 2009 and lasted six hours. The deethanizer pressure control valve ("DPCV"), PV-46060, failed to control the tower pressure during an acetylene converter upset and operators were not trained to put the DPCV, PV-46011, in manual mode and close the it before reestablishing air to the valve. Since this emissions event could have been avoided by better operational 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	Potential	Percent
	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
			25%
>> Programmatic Matrix			
	Falsification	Major	Moderate
	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
			Percent
			<input type="checkbox"/>
			0%
Matrix Notes	Human health or the environment in the Houston-Galveston-Brazoria nonattainment area has been exposed to insignificant amounts of contaminants that did not exceed protective levels as a result of the violation.		
	Adjustment	\$7,500	\$2,500
Violation Events			
	Number of Violation Events	1	Number of violation days
		1	
	<small>mark only one with an x</small>	daily	
		<input type="checkbox"/>	
		weekly	
		<input type="checkbox"/>	
		monthly	
		<input type="checkbox"/>	
		quarterly	
		<input checked="" type="checkbox"/>	
		semiannual	
		<input type="checkbox"/>	
		annual	
		<input type="checkbox"/>	
		single-event	
		<input type="checkbox"/>	
			Violation Base Penalty
			\$2,600
One quarterly event is recommended for the April 13, 2009 release.			
Good Faith Efforts to Comply			0.0% Reduction
			\$0
		<small>Before NOV</small>	<small>NOV to EDRP/Settlement Offer</small>
	Extraordinary	<input type="checkbox"/>	<input type="checkbox"/>
	Ordinary	<input type="checkbox"/>	<input type="checkbox"/>
	N/A	<input checked="" type="checkbox"/>	<input type="checkbox"/>
	Notes	The Respondent does not meet the good faith criteria for this violation.	
		Violation Subtotal	\$2,500
Economic Benefit (EB) for this violation			Statutory Limit Test
	Estimated EB Amount	\$24	Violation Final Penalty Total
			\$11,475
		This violation Final Assessed Penalty (adjusted for limits)	
		\$10,000	

Economic Benefit Worksheet

Respondent Equistar Chemicals, LP
Case ID No. 38455
Reg. Ent. Reference No. RN100542281
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
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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)	\$500	13-Apr-2009	1-Apr-2010	0.97	\$24	n/a	\$24

Notes for DELAYED costs

Estimated cost to train operators to place the pressure control valve in the manual position and drive the valve closed before activating it, then introduce feed to the Acetylene Converter. The date required is the date of the event and the final date is the date corrective actions are projected to be 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

\$500

TOTAL

\$24

Compliance History Report

Customer/Respondent/Owner-Operator: CN600124705 Equistar Chemicals, LP Classification: AVERAGE Rating: 3.00
Regulated Entity: RN100542281 CHANNELVIEW COMPLEX Classification: AVERAGE Site Rating: 4.28

ID Number(s):	ACCOUNT NUMBER	
AIR OPERATING PERMITS	ACCOUNT NUMBER	HG0033B
AIR OPERATING PERMITS	PERMIT	1426
AIR OPERATING PERMITS	PERMIT	2174
AIR OPERATING PERMITS	PERMIT	2175
AIR OPERATING PERMITS	PERMIT	2176
AIR OPERATING PERMITS	PERMIT	2177
AIR OPERATING PERMITS	PERMIT	2178
AIR OPERATING PERMITS	PERMIT	2179
AIR OPERATING PERMITS	PERMIT	2180
AIR OPERATING PERMITS	PERMIT	2181
AIR OPERATING PERMITS	PERMIT	2182
AIR OPERATING PERMITS	PERMIT	2183
AIR OPERATING PERMITS	PERMIT	2184
AIR OPERATING PERMITS	PERMIT	2185
WASTEWATER	PERMIT	WQ0000391000
WASTEWATER	PERMIT	TPDES0003531
WASTEWATER	PERMIT	TX0003531
AIR NEW SOURCE PERMITS	PERMIT	1768
AIR NEW SOURCE PERMITS	PERMIT	2128
AIR NEW SOURCE PERMITS	PERMIT	2933
AIR NEW SOURCE PERMITS	PERMIT	2936
AIR NEW SOURCE PERMITS	PERMIT	3130A
AIR NEW SOURCE PERMITS	PERMIT	3294
AIR NEW SOURCE PERMITS	PERMIT	3627
AIR NEW SOURCE PERMITS	PERMIT	6245
AIR NEW SOURCE PERMITS	PERMIT	6387
AIR NEW SOURCE PERMITS	PERMIT	8125
AIR NEW SOURCE PERMITS	PERMIT	10586
AIR NEW SOURCE PERMITS	PERMIT	10700
AIR NEW SOURCE PERMITS	PERMIT	10812
AIR NEW SOURCE PERMITS	PERMIT	11735
AIR NEW SOURCE PERMITS	PERMIT	12334
AIR NEW SOURCE PERMITS	PERMIT	13849
AIR NEW SOURCE PERMITS	PERMIT	15348

AIR NEW SOURCE PERMITS	PERMIT	12341
AIR NEW SOURCE PERMITS	PERMIT	22779
AIR NEW SOURCE PERMITS	PERMIT	23079
AIR NEW SOURCE PERMITS	PERMIT	24677
AIR NEW SOURCE PERMITS	PERMIT	24887
AIR NEW SOURCE PERMITS	PERMIT	30868
AIR NEW SOURCE PERMITS	PERMIT	32324
AIR NEW SOURCE PERMITS	PERMIT	32136
AIR NEW SOURCE PERMITS	PERMIT	32629
AIR NEW SOURCE PERMITS	PERMIT	33899
AIR NEW SOURCE PERMITS	PERMIT	34897
AIR NEW SOURCE PERMITS	PERMIT	42948
AIR NEW SOURCE PERMITS	PERMIT	47487
AIR NEW SOURCE PERMITS	PERMIT	50141
AIR NEW SOURCE PERMITS	PERMIT	50142
AIR NEW SOURCE PERMITS	PERMIT	50165
AIR NEW SOURCE PERMITS	ACCOUNT NUMBER	HG0033B
AIR NEW SOURCE PERMITS	PERMIT	52720
AIR NEW SOURCE PERMITS	PERMIT	54098
AIR NEW SOURCE PERMITS	REGISTRATION	88680
AIR NEW SOURCE PERMITS	REGISTRATION	76017
AIR NEW SOURCE PERMITS	REGISTRATION	75881
AIR NEW SOURCE PERMITS	REGISTRATION	76313
AIR NEW SOURCE PERMITS	REGISTRATION	76277
AIR NEW SOURCE PERMITS	AFS NUM	4820100075
AIR NEW SOURCE PERMITS	PERMIT	49120
AIR NEW SOURCE PERMITS	PERMIT	49130
AIR NEW SOURCE PERMITS	REGISTRATION	74110
AIR NEW SOURCE PERMITS	REGISTRATION	73859
AIR NEW SOURCE PERMITS	REGISTRATION	72948
AIR NEW SOURCE PERMITS	REGISTRATION	72946
AIR NEW SOURCE PERMITS	REGISTRATION	74051
AIR NEW SOURCE PERMITS	REGISTRATION	74563
AIR NEW SOURCE PERMITS	REGISTRATION	74181
AIR NEW SOURCE PERMITS	REGISTRATION	74944
AIR NEW SOURCE PERMITS	REGISTRATION	74949
AIR NEW SOURCE PERMITS	REGISTRATION	75322
AIR NEW SOURCE PERMITS	REGISTRATION	76778
AIR NEW SOURCE PERMITS	REGISTRATION	76791

AIR NEW SOURCE PERMITS	REGISTRATION	76651
AIR NEW SOURCE PERMITS	REGISTRATION	77318
AIR NEW SOURCE PERMITS	REGISTRATION	77619
AIR NEW SOURCE PERMITS	REGISTRATION	77640
AIR NEW SOURCE PERMITS	REGISTRATION	76693
AIR NEW SOURCE PERMITS	REGISTRATION	78024
AIR NEW SOURCE PERMITS	REGISTRATION	78069
AIR NEW SOURCE PERMITS	REGISTRATION	78128
AIR NEW SOURCE PERMITS	REGISTRATION	78108
AIR NEW SOURCE PERMITS	REGISTRATION	77631
AIR NEW SOURCE PERMITS	REGISTRATION	78278
AIR NEW SOURCE PERMITS	REGISTRATION	78343
AIR NEW SOURCE PERMITS	REGISTRATION	78191
AIR NEW SOURCE PERMITS	REGISTRATION	78252
AIR NEW SOURCE PERMITS	REGISTRATION	78560
AIR NEW SOURCE PERMITS	REGISTRATION	78173
AIR NEW SOURCE PERMITS	REGISTRATION	78197
AIR NEW SOURCE PERMITS	REGISTRATION	78772
AIR NEW SOURCE PERMITS	REGISTRATION	78381
AIR NEW SOURCE PERMITS	REGISTRATION	78819
AIR NEW SOURCE PERMITS	REGISTRATION	79261
AIR NEW SOURCE PERMITS	REGISTRATION	79431
AIR NEW SOURCE PERMITS	REGISTRATION	79460
AIR NEW SOURCE PERMITS	REGISTRATION	78599
AIR NEW SOURCE PERMITS	REGISTRATION	78978
AIR NEW SOURCE PERMITS	REGISTRATION	80296
AIR NEW SOURCE PERMITS	REGISTRATION	80137
AIR NEW SOURCE PERMITS	REGISTRATION	80914
AIR NEW SOURCE PERMITS	REGISTRATION	80689
AIR NEW SOURCE PERMITS	REGISTRATION	80597
AIR NEW SOURCE PERMITS	REGISTRATION	81543
AIR NEW SOURCE PERMITS	REGISTRATION	81190
AIR NEW SOURCE PERMITS	REGISTRATION	81189
AIR NEW SOURCE PERMITS	REGISTRATION	81759
AIR NEW SOURCE PERMITS	REGISTRATION	81636
AIR NEW SOURCE PERMITS	REGISTRATION	81630
AIR NEW SOURCE PERMITS	REGISTRATION	82226
AIR NEW SOURCE PERMITS	REGISTRATION	81716

AIR NEW SOURCE PERMITS	REGISTRATION	81930
AIR NEW SOURCE PERMITS	REGISTRATION	82538
AIR NEW SOURCE PERMITS	REGISTRATION	85128
AIR NEW SOURCE PERMITS	REGISTRATION	84818
AIR NEW SOURCE PERMITS	REGISTRATION	85442
AIR NEW SOURCE PERMITS	REGISTRATION	87006
AIR NEW SOURCE PERMITS	REGISTRATION	85303
AIR NEW SOURCE PERMITS	REGISTRATION	84079
AIR NEW SOURCE PERMITS	REGISTRATION	84091
AIR NEW SOURCE PERMITS	PERMIT	83799
AIR NEW SOURCE PERMITS	REGISTRATION	84183
AIR NEW SOURCE PERMITS	REGISTRATION	84715
AIR NEW SOURCE PERMITS	REGISTRATION	84149
AIR NEW SOURCE PERMITS	REGISTRATION	84502
AIR NEW SOURCE PERMITS	REGISTRATION	84076
AIR NEW SOURCE PERMITS	REGISTRATION	84651
AIR NEW SOURCE PERMITS	REGISTRATION	84381
AIR NEW SOURCE PERMITS	REGISTRATION	85308
AIR NEW SOURCE PERMITS	REGISTRATION	84541
AIR NEW SOURCE PERMITS	REGISTRATION	88142
INDUSTRIAL AND HAZARDOUS WASTE GENERATION	EPA ID	TXD058275769
INDUSTRIAL AND HAZARDOUS WASTE GENERATION	SOLID WASTE REGISTRATION # (SWR)	30030
INDUSTRIAL AND HAZARDOUS WASTE STORAGE	PERMIT	50117
INDUSTRIAL AND HAZARDOUS WASTE STORAGE	PERMIT	50117
UNDERGROUND INJECTION CONTROL	PERMIT	WDW036
PUBLIC WATER SYSTEM/SUPPLY	REGISTRATION	1011578
WATER LICENSING	LICENSE	1011578
IHW CORRECTIVE ACTION	SOLID WASTE REGISTRATION # (SWR)	30030

Location: 8280 SHELDON RD, CHANNELVIEW, TX, 77530

TCEQ Region: REGION 12 - HOUSTON

Date Compliance History Prepared: August 12, 2009

Agency Decision Requiring Compliance History: Enforcement

Compliance Period: August 12, 2004 to August 12, 2009

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

Name: Trina Grieco Phone: (210) 403-4006

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/operator of the site during the compliance period? No
3. If Yes, who is the current owner/operator? N/A
4. If Yes, who was/were the prior owner(s)/operator(s) ? N/A
5. When did the change(s) in owner or operator occur? N/A
6. Rating Date: 9/1/2008 Repeat Violator: NO

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: 12/02/2006

ADMINORDER 2006-0515-AIR-E

Classification: Moderate

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

Rqmt Prov: S.C. 1 PERMIT

Description: Failure to prevent the release of unauthorized emissions from an aboveground storage tank pressure safety valve.

Effective Date: 05/22/2008

ADMINORDER 2007-1230-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: Permit # 2128 SC 1 PA

Description: As evidenced by Findings of Fact No. 3, Equistar failed to prevent unauthorized emissions during an April 4, 2007 emissions event, in violation of Air Permit No. 2128, Special Condition No. 1, 30 TEX. ADMIN. CODE § 116.115(c), and TEX. HEALTH & SAFETY CODE § 382.085(b). Since these emissions were avoidable, the demonstrations in 30 TEX. ADMIN. CODE § 101.222 necessary to present an affirmative defense were not met.

Classification: Moderate

Citation: 30 TAC Chapter 115, SubChapter H 115.722(c)(1)

30 TAC Chapter 116, SubChapter B 116.115(c)

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

Rqmt Prov: TCEQ Air Permit #2933, SC#1 PA

Description: As evidenced by Findings of Fact No. 4, Equistar failed to prevent unauthorized emissions during a January 8, 2007 emissions event, in violation of Air Permit No. 2933, Special Condition No. 1, 30

TEX. ADMIN. CODE §§ 115.722(c)(1) and 116.115(c), and TEX. HEALTH & SAFETY CODE § 382.085(b). Since these emissions were unauthorized, the demonstrations in 30 TEX. ADMIN. CODE § 101.222 necessary to present an affirmative defense were not met.

Effective Date: 06/19/2008

ADMINORDER 2007-0493-AIR-E

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: FOP O-02177 SC 10 OP

FOP O-02177 SC 1A OP

NSR 22779 SC 8(E) PA

Description: Failed to cap 4 open-ended lines.

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: FOP O-02177 SC 10 OP

FOP O-02177 SC 1A OP

NSR 22779 SC 6(A) PA

Description: Failed to operate flare within required heat input of 300 Btu/scf.

Classification: Minor

Citation: 30 TAC Chapter 115, SubChapter H 115.726(d)(3)
30 TAC Chapter 122, SubChapter B 122.143(4)
5C THC Chapter 382, SubChapter D 382.085(b)

Rqmt Prov: FOP O-02177 SC 1.J(ii) OP

Description: Failed to report corrective actions within the required time frame.

Classification: Moderate

Citation: 30 TAC Chapter 115, SubChapter H 115.725(d)(2)
30 TAC Chapter 122, SubChapter B 122.143(4)
5C THC Chapter 382, SubChapter D 382.085(b)

Rqmt Prov: FOP O-01277 SC 1.J(ii) OP

Description: Failed to calibrate the Poly Butadiene unit flare analyzer.

Classification: Minor

Citation: 30 TAC Chapter 122, SubChapter B 122.121
5C THC Chapter 382, SubChapter D 382.085(b)
5C THSC Chapter 382 382.054

Description: Failed to obtain authorization for emissions sources and their associated emissions prior to operation.

Classification: Moderate

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

Rqmt Prov: FOP O-02177 SC 10 OP
NSR 49120 SC 1 PA

Description: Failed to comply with permitted emissions limits.

Classification: Moderate

Citation: 30 TAC Chapter 115, SubChapter B 115.136(a)(1)
30 TAC Chapter 122, SubChapter B 122.143(4)
5C THC Chapter 382, SubChapter D 382.085(b)

Rqmt Prov: FOP O-02177 SC 1A OP

Description: Failed to maintain sufficient records to demonstrate continuous compliance with VOC water separator exemption criteria.

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: FOP O-02177 SC 10 OP
FOP O-02177 SC 1A OP
NSR 22779 SC 8(I) PA

Description: The Respondent failed to repair a leaking valve during a scheduled shutdown.

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 63.127(b)(2)
5C THC Chapter 382, SubChapter D 382.085(b)

Rqmt Prov: FOP O-02181 SC 1A OP

Description: Failed to use a continuous monitoring recorder on the Methanol Skid (ECULR2MEOH).

Classification: Moderate

Citation: 30 TAC Chapter 115, SubChapter C 115.244
30 TAC Chapter 122, SubChapter B 122.143(4)
5C THC Chapter 382, SubChapter D 382.085(b)

Rqmt Prov: FOP O-02181 SC 6C(iv) OP

Description: Failed to perform daily inspections of the fuel dispensing facilities.

Classification: Moderate

Citation: 30 TAC Chapter 115, SubChapter C 115.212(a)(3)(A)(ii)
30 TAC Chapter 122, SubChapter B 122.143(4)
5C THC Chapter 382, SubChapter D 382.085(b)

Rqmt Prov: FOP O-02181 SC 6B(ii) OP
FOP O-02181 SC1A OP

Description: Failed to provide proper emissions control for waste material.

Classification: Moderate

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

Rqmt Prov: FOP O-02181 SC 7A OP
FOP O-02181 SC1A OP

Description: Failed to comply with restrictions on engine operating hours in an ozone nonattainment area.

Classification: Minor

Citation: 30 TAC Chapter 117, SubChapter B 117.219(f)(10)
30 TAC Chapter 122, SubChapter B 122.143(4)
5C THC Chapter 382, SubChapter D 382.085(b)

Rqmt Prov: FOP O-02181 SC 1A OP
FOP O-02181 SC 7E OP

Description: Failure to record the start and stop times of diesel pump.

Classification: Moderate

Citation: 30 TAC Chapter 115, SubChapter B 115.144(4)(A)
5C THC Chapter 382, SubChapter D 382.085(b)

Rqmt Prov: FOP O-02181 SC 1A OP

Description: Failed to demonstrate VOC reduction efficiency for the ECUABEAST bio-treatment unit.

Classification: Moderate

Citation: 30 TAC Chapter 115, SubChapter H 115.725(d)(1)
5C THC Chapter 382, SubChapter D 382.085(b)

Description: Failed to timely conduct flare analyzer calibrations.

Classification: Moderate

Citation: 30 TAC Chapter 101, SubChapter A 101.20(2)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT A 63.10(d)(5)(l)
5C THC Chapter 382, SubChapter D 382.085(b)

Description: Failed to comply with the requirements of malfunction reporting for the wastewater steam stripper (EUTT8802).

Classification: Moderate

Citation: 30 TAC Chapter 101, SubChapter A 101.20(1)
30 TAC Chapter 101, SubChapter A 101.20(2)
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 63, SubChapter C, PT 63, SubPT H 63.167(a)(1)
5C THC Chapter 382, SubChapter D 382.085(b)

Rqmt Prov: FOP O-02181 SC 1A OP
FOP O-02181 SC 22 OP
NSR 2128 SC 8(E) PA

Description: Failed to equip open ended lines with a cap, blind flange, plug, or a second valve.

Classification: Minor

Citation: 30 TAC Chapter 122, SubChapter B 122.132(a)
5C THC Chapter 382, SubChapter D 382.085(b)

Rqmt Prov: General Terms and Conditions OP

Description: Failed to include PBR claims in a FOP.

Classification: Moderate

Citation: 30 TAC Chapter 115, SubChapter B 115.112(a)(3)
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: FOP O-02178 SC 10 OP
FOP O-02178 SC 1A OP
NSR 24677 SC 1 PA

Description: Exceeded permitted emissions limits from tank TK-2810.

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: FOP O-02178 SC 10 OP

NSR 24677 SC 11F PA
NSR 24677 SC 13 PA

Description: Failed to install rupture disc and pressure gauges on three safety relief valves (EPM F28E00) in the Styrene Maleic Anhydride unit.

Classification: Moderate

Citation: 30 TAC Chapter 116, SubChapter B 116.116(b)(1)
30 TAC Chapter 122, SubChapter B 122.143(4)
5C THC Chapter 382, SubChapter D 382.085(b)

Rqmt Prov: STC 10 OP

Description: Failed to accurately represent operating temperatures for tote EPN 28E37 in the permit representations.

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: FOP -02178 SC 10 OP
NSR 24677 SC 9C PA

Description: Failed to perform closed loop cumene sampling.

Classification: Minor

Citation: 30 TAC Chapter 117, SubChapter B 117.213(a)
30 TAC Chapter 122, SubChapter B 122.143(4)
5C THC Chapter 382, SubChapter D 382.085(b)

Rqmt Prov: FOP O-02178 SC 1A OP

Description: Failed to maintain continuous records of fuel flow for Heater MSMHT2801B.

Classification: Minor

Citation: 30 TAC Chapter 111, SubChapter A 111.111(a)(1)(B)
30 TAC Chapter 122, SubChapter B 122.143(4)
5C THC Chapter 382, SubChapter D 382.085(b)

Rqmt Prov: FOP O-02178 SC 3 OP

Description: Failed to prevent visible emissions from Dust Collector EPN28E29.

Effective Date: 10/01/2008

COURTORDER

Classification: Moderate

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

Description: Failure to control emissions from cooling towers OP1, OP2, and East Plant under MAERT limits.

Classification: Moderate

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

Description: Failure to properly define for cooling towers OP1 and OP2, VOC in the exhaust air from the air stripping system (either ppmv or lb/VOC/gal) at which a leak into cooling water will be assumed.

Classification: Moderate

Citation: 30 TAC Chapter 101, SubChapter A 101.6(a)(1)(A)

Description: Failure to report upset emissions of benzene from cooling towers.

Classification: Major

Citation: 30 TAC Chapter 335, SubChapter A 335.2
30 TAC Chapter 335, SubChapter B 335.43

Description: Unauthorized discharges into the East basin were noted

Classification: Moderate

Citation: 5C THC Chapter 382, SubChapter A 382.085(a)

Description: Failed to prevent unauthorized emissions of 4,380 pounds (lbs) of unspecified volatile organic compounds (VOCs), 1,511 lbs of butadiene, and 1,095 lbs of butene during an emissions event on September 1, 2003 that lasted three minutes.

Classification: Major

Citation: 30 TAC Chapter 101, SubChapter F 101.201(b)(7)
5C THC Chapter 382, SubChapter A 382.085(b)

Description: Failed to report all individually listed compounds or mixtures of air contaminants in an emissions event notification. Specifically, VOCs were not speciated.

Classification: Moderate

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

Description: Failed to prevent the unauthorized release of 173 pounds (lbs) of volatile organic compounds (VOCs), including 30 lbs of Highly Reactive VOCs from the Condensate Pot (D-3655) during an emissions event that began on April 21, 2004 and lasted for 170 hours and 45 minutes.

Classification: Moderate

Citation: 30 TAC Chapter 101, SubChapter F 101.201(a)(2)(D)
5C THC Chapter 382, SubChapter A 382.085(b)

Description: Failed to properly notify the TCEQ of an emissions event that began on July 14, 2004. Specifically, Equistar failed to identify the common name of the facility which incurred the emissions event in the Initial Notification.

Classification: Moderate

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

Rqmt Prov: General Condition No. 8 PERMIT

Description: Failed to comply with permitted emission limits during an emissions event that began on July 14, 2004 and lasted for three hours and 30 minutes.

Classification: Moderate

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

Description: Failed to prevent the unauthorized release of 6,100 pounds of propylene from the Propylene Product Drum (D-4687) during an emissions event that began on June 23, 2004 and lasted for two hours.

Classification: Moderate

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

Description: Failed to prevent the unauthorized release of 340 lbs of propylene and 17 lbs of propane from a pressure relief valve in Exchanger E-36232 during an emissions event that began on July 14, 2004 and lasted for 3,057 hours.

Classification: Moderate

Citation: 30 TAC Chapter 101, SubChapter F 101.201(a)(2)(G)
30 TAC Chapter 101, SubChapter F 101.201(b)(7)
5C THC Chapter 382, SubChapter A 382.085(b)

Description: Failed to properly notify the TCEQ of an emissions event that began on July 22, 2004. Specifically, Equistar failed to speciate VOCs in the Initial Notification and Final Report.

Classification: Moderate

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

Rqmt Prov: Permit No. 1768, General Condition No. 8 PERMIT
Permit No. 2936, Special Condition No. 1 PERMIT

Description: Failed to comply with permitted emission limits during an emissions event that began on July 22, 2004 and lasted for 200 hours.

Classification: Moderate

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

Rqmt Prov: TCEQ Air Permit No. 2128, GC No. 8 PERMIT

Description: Failed to prevent a unauthorized emissions of 990 pounds ("lbs") of 1,3 butadiene during an avoidable emissions event that occurred on November 23, 2004 and lasted three minutes.

Classification: Moderate

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

Rqmt Prov: TCEQ Permit #1768, GC #8 PERMIT

Description: Failed to prevent unauthorized emissions of 119.35 pounds (lbs) of benzene and 154.69 lbs of volatile organic compounds during an emissions event that occurred on April 1, 2005 and lasted 200 hours and 30 minutes.

Classification: Moderate

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

Rqmt Prov: TCEQ Permit #6387, GC #8 PERMIT

Description: Failed to prevent unauthorized emissions of 25 pounds (lbs) of 1,3-butadiene, 603 lbs of N-butane, 1,756 lbs of butene, 155 lbs of isobutane, and 7 lbs of propylene during an emissions event that occurred on May 24, 2005 and lasted 2 hours. These emissions are not permitted. Since this emissions event was avoidable

Classification: Moderate

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

Rqmt Prov: TCEQ Air Permit No. 24887, GC #8 PERMIT

Description: Failed to prevent a unauthorized emissions of 1,532 lbs of propylene and 10 lbs of isobutane during an avoidable emissions event that occurred on July 1, 2004 and lasted 4 hours and 54 minutes.

Classification: Moderate

Citation: 30 TAC Chapter 101, SubChapter A 101.20(2)
30 TAC Chapter 113, SubChapter C 113.130
30 TAC Chapter 116, SubChapter B 116.115(c)
40 CFR Chapter 61, SubChapter C, PT 61, SubPT V 61.242-6(a)(2)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.167(a)(2)
5C THC Chapter 382, SubChapter A 382.085(b)

Rqmt Prov: Special Condition 2 PERMIT

Description: Failed to properly seal the end of a lines containing volatile organic compounds ("VOCs") and hazardous air pollutants ("HAPs"). Specifically, VOC and HAP concentrations detected from 10 plugs in the Methyl Tertiary Butyl Ether ("MTBE") and Butadiene ("C4 Recovery") units.

Classification: Moderate

Citation: 30 TAC Chapter 101, SubChapter A 101.20(2)
30 TAC Chapter 113, SubChapter C 113.130
30 TAC Chapter 115, SubChapter D 115.352(4)
30 TAC Chapter 116, SubChapter B 116.115(c)
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: Special Condition 10E PERMIT

Special Condition 1E PERMIT

Special Condition 2C PERMIT

Description: Failed to equip each open-ended line or valve with a cap, blind flange, plug, or second valve. Specifically, two valves in the East Tank Farm, one line in the Alkylolation Unit, and one line in the C4 Recovery Unit were not equipped with a cap, blind flange, plug, or second valve.

Classification: Moderate

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

Rqmt Prov: 2128, SC No.7A PERMIT

Description: Failed to perform monthly monitoring of the East Plant Cooling Tower, Emission Point Number ("EPN") 24E04. Specifically, streams from six headers returning water to the cooling tower to a single monitoring point were combined prior to monitoring, but required to monitor the six headers individually.

Classification: Moderate

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

Rqmt Prov: 2128, SC No. 7B PERMIT

Description: Failed to maintain an emission rate below the allowable emission limit for EPN 24E04. Specifically, a canister sample was taken at Header Number 2 and results revealed emissions were 6.16 lbs per hour ("lbs/hr"), but the permitted limit is 3.23 lbs/hr.

Classification: Moderate

Citation: 30 TAC Chapter 116, SubChapter B 116.116(a)(1)

Description: Failed to represent the product and process information properly in the renewal application dated August 2004 for Permit No. 24887. Specifically, alkylates were not separated into C5s, C6s, C8s, C9s, and C10s. The alkylates contain 3 to 6% of isopentane and more than 1,102 tons per year is being produced.

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	08/13/2004	(277268)
2	08/23/2004	(259476)
3	08/24/2004	(351829)
4	08/27/2004	(265746)
5	08/27/2004	(265803)
6	08/27/2004	(266244)
7	08/27/2004	(269133)

8	08/29/2004	(268291)
9	08/31/2004	(271963)
10	08/31/2004	(272796)
11	08/31/2004	(274451)
12	08/31/2004	(276264)
13	09/01/2004	(286398)
14	09/01/2004	(289083)
15	09/01/2004	(289240)
16	09/10/2004	(273388)
17	09/16/2004	(263553)
18	09/23/2004	(351830)
19	10/25/2004	(351831)
20	10/25/2004	(351833)
21	11/01/2004	(285942)
22	11/03/2004	(334297)
23	11/05/2004	(334308)
24	11/05/2004	(334310)
25	11/05/2004	(334314)
26	11/11/2004	(292333)
27	11/11/2004	(292452)
28	11/14/2004	(275792)
29	11/22/2004	(293289)
30	11/22/2004	(339105)
31	11/22/2004	(339107)
32	11/23/2004	(334387)
33	11/23/2004	(334429)
34	11/23/2004	(351832)
35	11/29/2004	(274800)
36	12/06/2004	(275639)
37	12/06/2004	(341908)
38	12/09/2004	(343543)
39	12/14/2004	(339112)
40	12/15/2004	(339111)
41	12/27/2004	(276826)
42	12/27/2004	(381708)
43	12/28/2004	(343601)
44	01/03/2005	(286756)
45	01/03/2005	(339113)
46	01/04/2005	(339104)
47	01/05/2005	(339108)
48	01/07/2005	(339103)
49	01/10/2005	(343232)
50	01/12/2005	(346553)
51	01/18/2005	(336265)
52	02/10/2005	(337111)
53	02/10/2005	(349111)
54	02/10/2005	(349267)
55	02/10/2005	(349316)
56	02/10/2005	(349636)
57	02/11/2005	(336418)
58	02/11/2005	(336433)
59	02/11/2005	(336438)
60	02/17/2005	(343594)
61	02/23/2005	(381706)
62	02/25/2005	(345588)
63	03/03/2005	(339106)
64	03/22/2005	(381707)
65	03/28/2005	(375212)
66	03/28/2005	(375220)

67	03/28/2005	(375234)
68	03/31/2005	(373125)
69	04/06/2005	(375076)
70	04/18/2005	(375016)
71	04/20/2005	(372583)
72	04/20/2005	(376147)
73	04/22/2005	(346277)
74	04/25/2005	(377509)
75	05/03/2005	(419501)
76	05/24/2005	(419502)
77	06/14/2005	(393497)
78	06/21/2005	(419503)
79	06/22/2005	(381407)
80	06/22/2005	(392621)
81	06/23/2005	(378454)
82	06/23/2005	(378466)
83	07/15/2005	(395098)
84	07/18/2005	(392902)
85	07/22/2005	(381313)
86	07/22/2005	(392487)
87	07/22/2005	(392651)
88	07/22/2005	(394428)
89	07/25/2005	(440656)
90	07/26/2005	(399215)
91	08/05/2005	(381400)
92	08/05/2005	(392610)
93	08/05/2005	(393207)
94	08/11/2005	(404321)
95	08/11/2005	(404342)
96	08/11/2005	(404367)
97	08/11/2005	(404370)
98	08/12/2005	(399221)
99	08/15/2005	(404957)
100	08/23/2005	(440657)
101	08/24/2005	(406415)
102	08/26/2005	(372787)
103	08/29/2005	(406161)
104	09/13/2005	(431694)
105	10/24/2005	(440658)
106	10/26/2005	(440659)
107	11/15/2005	(434603)
108	11/18/2005	(437299)
109	11/22/2005	(468155)
110	11/28/2005	(468154)
111	12/01/2005	(435325)
112	12/08/2005	(434728)
113	12/19/2005	(438915)
114	12/21/2005	(468156)
115	02/15/2006	(455481)
116	02/22/2006	(450109)
117	02/24/2006	(451477)
118	02/27/2006	(468153)
119	02/28/2006	(451452)
120	02/28/2006	(451480)
121	02/28/2006	(451483)
122	02/28/2006	(451494)
123	02/28/2006	(451788)
124	03/13/2006	(454890)
125	03/23/2006	(498017)

126	03/24/2006	(457373)
127	03/28/2006	(453139)
128	03/29/2006	(459500)
129	03/31/2006	(455940)
130	04/24/2006	(498018)
131	04/28/2006	(462755)
132	05/16/2006	(463873)
133	05/23/2006	(466508)
134	05/23/2006	(498019)
135	05/24/2006	(465260)
136	05/31/2006	(480405)
137	05/31/2006	(480422)
138	05/31/2006	(480427)
139	05/31/2006	(480433)
140	05/31/2006	(480441)
141	05/31/2006	(480444)
142	06/21/2006	(498020)
143	06/26/2006	(464019)
144	06/30/2006	(483427)
145	07/07/2006	(484895)
146	07/17/2006	(460500)
147	07/17/2006	(464664)
148	07/19/2006	(480415)
149	07/20/2006	(486401)
150	07/24/2006	(520033)
151	07/28/2006	(484749)
152	08/04/2006	(339110)
153	08/15/2006	(481194)
154	08/15/2006	(482128)
155	08/15/2006	(489890)
156	08/16/2006	(457265)
157	08/21/2006	(520034)
158	09/01/2006	(510768)
159	09/05/2006	(486742)
160	09/25/2006	(520035)
161	10/04/2006	(488324)
162	10/24/2006	(544282)
163	11/21/2006	(516667)
164	11/27/2006	(544283)
165	11/30/2006	(531615)
166	12/11/2006	(519152)
167	12/19/2006	(544284)
168	12/29/2006	(535494)
169	01/23/2007	(544285)
170	01/30/2007	(538091)
171	01/31/2007	(517108)
172	01/31/2007	(537091)
173	01/31/2007	(537099)
174	01/31/2007	(537102)
175	02/08/2007	(538420)
176	02/22/2007	(485046)
177	02/22/2007	(574936)
178	02/27/2007	(532597)
179	03/21/2007	(532595)
180	03/23/2007	(574937)
181	04/05/2007	(532607)
182	04/10/2007	(532608)
183	04/12/2007	(541831)
184	04/12/2007	(554839)

185	04/18/2007	(593172)
186	04/23/2007	(539454)
187	04/23/2007	(574938)
188	05/23/2007	(574939)
189	06/25/2007	(574940)
190	06/27/2007	(560042)
191	07/18/2007	(556815)
192	07/18/2007	(566602)
193	07/24/2007	(567353)
194	07/28/2007	(574941)
195	07/30/2007	(543338)
196	08/03/2007	(543345)
197	08/06/2007	(568530)
198	08/06/2007	(568542)
199	08/06/2007	(607498)
200	08/09/2007	(562982)
201	08/09/2007	(563012)
202	08/10/2007	(562990)
203	08/10/2007	(563023)
204	08/10/2007	(564946)
205	08/20/2007	(564294)
206	08/20/2007	(564331)
207	08/20/2007	(564360)
208	08/22/2007	(607499)
209	08/23/2007	(571675)
210	08/24/2007	(543303)
211	08/24/2007	(543306)
212	09/24/2007	(607500)
213	09/28/2007	(563816)
214	09/28/2007	(564856)
215	09/28/2007	(564932)
216	09/28/2007	(566320)
217	10/04/2007	(565773)
218	10/10/2007	(565969)
219	10/10/2007	(566558)
220	10/10/2007	(566616)
221	10/12/2007	(571938)
222	10/12/2007	(572220)
223	10/12/2007	(572252)
224	10/12/2007	(572267)
225	10/12/2007	(572362)
226	10/12/2007	(572404)
227	10/15/2007	(572176)
228	10/16/2007	(593759)
229	10/23/2007	(619405)
230	11/19/2007	(594272)
231	11/19/2007	(619406)
232	11/26/2007	(570252)
233	11/26/2007	(570313)
234	11/26/2007	(570316)
235	11/26/2007	(570346)
236	11/26/2007	(570400)
237	11/28/2007	(596225)
238	12/07/2007	(568047)
239	12/07/2007	(568066)
240	12/07/2007	(568076)
241	12/07/2007	(568153)
242	12/07/2007	(568347)
243	12/07/2007	(568368)

244	12/17/2007	(608808)
245	12/27/2007	(619407)
246	01/02/2008	(595848)
247	01/02/2008	(599541)
248	01/03/2008	(599518)
249	01/03/2008	(599950)
250	01/08/2008	(600740)
251	01/10/2008	(600765)
252	01/10/2008	(613652)
253	01/22/2008	(671912)
254	01/23/2008	(614499)
255	01/25/2008	(615980)
256	01/28/2008	(615871)
257	01/28/2008	(616242)
258	01/29/2008	(610831)
259	02/15/2008	(615597)
260	02/25/2008	(671910)
261	03/06/2008	(596061)
262	03/06/2008	(610691)
263	03/19/2008	(616201)
264	03/19/2008	(616236)
265	03/19/2008	(616259)
266	03/20/2008	(671911)
267	03/26/2008	(637649)
268	03/27/2008	(611770)
269	04/04/2008	(610663)
270	04/10/2008	(616840)
271	04/22/2008	(689830)
272	04/24/2008	(637133)
273	04/29/2008	(641446)
274	05/02/2008	(610690)
275	05/06/2008	(638391)
276	05/06/2008	(638445)
277	05/06/2008	(638471)
278	05/08/2008	(638556)
279	05/16/2008	(639245)
280	05/16/2008	(639472)
281	05/22/2008	(689831)
282	05/23/2008	(639094)
283	06/06/2008	(682324)
284	06/16/2008	(610615)
285	06/17/2008	(636281)
286	06/24/2008	(689832)
287	07/03/2008	(636094)
288	07/03/2008	(681436)
289	07/07/2008	(654572)
290	07/09/2008	(683399)
291	07/10/2008	(685750)
292	07/18/2008	(681438)
293	07/22/2008	(710592)
294	07/30/2008	(687221)
295	08/01/2008	(681437)
296	08/11/2008	(610620)
297	08/11/2008	(637040)
298	08/13/2008	(682388)
299	08/15/2008	(689619)
300	08/25/2008	(710593)
301	08/27/2008	(638212)
302	08/29/2008	(681367)

303	09/08/2008	(681362)
304	10/13/2008	(704398)
305	10/15/2008	(686481)
306	10/15/2008	(686491)
307	10/17/2008	(679974)
308	10/17/2008	(680354)
309	10/22/2008	(682983)
310	10/22/2008	(727384)
311	10/23/2008	(680427)
312	10/23/2008	(681178)
313	10/27/2008	(687534)
314	10/28/2008	(685998)
315	10/29/2008	(686367)
316	10/29/2008	(686377)
317	10/29/2008	(686382)
318	10/29/2008	(687350)
319	10/29/2008	(705305)
320	10/31/2008	(686446)
321	11/07/2008	(701030)
322	11/20/2008	(704732)
323	11/20/2008	(704907)
324	11/21/2008	(706552)
325	11/24/2008	(654539)
326	11/24/2008	(727385)
327	11/25/2008	(707993)
328	12/04/2008	(700744)
329	12/04/2008	(702100)
330	12/05/2008	(654812)
331	12/05/2008	(654846)
332	12/05/2008	(654874)
333	12/05/2008	(707275)
334	12/11/2008	(683007)
335	12/15/2008	(686398)
336	12/15/2008	(686403)
337	12/15/2008	(686411)
338	12/15/2008	(686444)
339	12/15/2008	(686496)
340	12/15/2008	(686500)
341	12/15/2008	(686508)
342	12/16/2008	(710038)
343	12/17/2008	(685609)
344	12/17/2008	(710007)
345	12/22/2008	(727386)
346	01/09/2009	(721591)
347	01/16/2009	(709781)
348	01/16/2009	(721214)
349	01/22/2009	(750128)
350	02/03/2009	(722705)
351	02/10/2009	(726755)
352	02/12/2009	(683026)
353	02/13/2009	(657092)
354	02/16/2009	(724818)
355	02/16/2009	(725983)
356	02/16/2009	(726007)
357	02/16/2009	(726040)
358	02/16/2009	(726571)
359	02/16/2009	(726949)
360	02/17/2009	(726783)
361	02/24/2009	(750125)

362	02/26/2009	(725940)
363	03/23/2009	(750126)
364	03/31/2009	(735618)
365	04/06/2009	(738472)
366	04/09/2009	(738272)
367	04/13/2009	(738348)
368	04/13/2009	(738352)
369	04/13/2009	(738805)
370	04/17/2009	(740559)
371	04/22/2009	(736328)
372	04/28/2009	(737713)
373	04/30/2009	(740883)
374	05/01/2009	(707130)
375	05/04/2009	(738986)
376	05/04/2009	(741949)
377	05/04/2009	(741983)
378	05/04/2009	(741994)
379	05/14/2009	(742317)
380	05/14/2009	(742327)
381	05/15/2009	(742125)
382	05/15/2009	(742826)
383	05/26/2009	(705763)
384	06/17/2009	(749322)
385	06/18/2009	(749474)
386	06/24/2009	(741317)
387	06/24/2009	(744476)
388	06/24/2009	(744489)
389	06/24/2009	(748352)
390	06/29/2009	(741269)
391	06/29/2009	(744624)
392	07/02/2009	(744588)
393	07/02/2009	(745599)
394	07/02/2009	(745661)
395	07/02/2009	(745805)
396	07/03/2009	(747361)
397	07/06/2009	(745792)
398	07/07/2009	(744818)
399	07/08/2009	(745749)
400	07/08/2009	(745772)
401	07/08/2009	(745783)
402	07/09/2009	(701940)
403	07/14/2009	(746327)
404	07/14/2009	(746862)
405	07/15/2009	(746896)
406	07/15/2009	(747036)
407	07/15/2009	(748537)
408	07/16/2009	(748500)
409	07/17/2009	(741607)
410	07/17/2009	(748489)
411	07/17/2009	(748521)
412	07/17/2009	(761599)
413	07/21/2009	(741126)
414	07/21/2009	(748906)
415	08/06/2009	(747389)
416	08/07/2009	(759876)
417	08/10/2009	(749006)
418	08/10/2009	(749069)

Date: 08/27/2004 (265746) CN600124705
 Self Report? NO Classification: Minor
 Citation: 30 TAC Chapter 101, SubChapter F 101.201(a)(2)(D)
 30 TAC Chapter 101, SubChapter F 101.201(b)(4)
 Description: Equistar failed to properly complete and submit an emissions event notification.
 Self Report? NO Classification: Moderate
 Citation: 30 TAC Chapter 116, SubChapter B 116.115(b)
 5C THC Chapter 382, SubChapter A 382.085(b)
 Description: Equistar exceeded permit limits during an avoidable emissions event.

Date: 08/29/2004 (268291) CN600124705
 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: Equistar exceeded VOC permit limit.

Date: 08/31/2004 (272796) CN600124705
 Self Report? NO Classification: Minor
 Citation: 30 TAC Chapter 101, SubChapter F 101.201(a)(2)(H)
 30 TAC Chapter 101, SubChapter F 101.201(b)(8)
 5C THC Chapter 382, SubChapter A 382.085(b)
 Description: Failed to submit administratively complete emissions event notifications.

Date: 08/31/2004 (271963) CN600124705
 Self Report? NO Classification: Moderate
 Citation: 30 TAC Chapter 101, SubChapter F 101.211(a)(1)(F)
 30 TAC Chapter 101, SubChapter F 101.211(b)(5)
 30 TAC Chapter 116, SubChapter B 116.115(c)
 Description: Equistar was not in compliance with the maintenance, startup, and shutdown rules.

Date: 10/31/2004 (351832) CN600124705
 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: 12/27/2004 (276826) CN600124705
 Self Report? NO Classification: Moderate
 Citation: 30 TAC Chapter 116, SubChapter B 116.115(b)
 5C THC Chapter 382, SubChapter A 382.085(b)
 TCEQ Air Permit No. 2933, GC #8 PERMIT
 Description: Exceeded permit limits during an avoidable emissions event.

Date: 01/03/2005 (286756) CN600124705
 Self Report? NO Classification: Moderate
 Citation: 22779 PERMIT
 30 TAC Chapter 116, SubChapter B 116.115(c)
 5C THC Chapter 382, SubChapter A 382.085(b)
 Description: Equistar failed to prevent an avoidable emissions event.

Date: 01/04/2005 (339104) CN600124705
 Self Report? NO Classification: Moderate
 Citation: 30 TAC Chapter 116, SubChapter B 116.115(b)(2)(G)
 5C THC Chapter 382, SubChapter A 382.085(b)
 Description: Equistar failed to prevent an avoidable emissions event.

Date: 01/10/2005 (343232) CN600124705
 Self Report? NO Classification: Minor

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

Description: Failure to provide an adequate ground storage capacity.

Self Report? NO Classification: Minor

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

Description: Failure to provide a minimum pressure tank capacity of 220 gallons.

Date: 04/20/2005 (372583) CN600124705

Self Report? NO Classification: Minor

Citation: 30 TAC Chapter 101, SubChapter F 101.201(g)

Description: Equistar failed to submit the Final Report electronically.

Self Report? NO Classification: Moderate

Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
5C THC Chapter 382, SubChapter A 382.085(b)
Permit No. 22779, Special Condition No.1 PERMIT

Description: Equistar failed to prevent an avoidable emissions event.

Date: 08/05/2005 (381400) CN600124705

Self Report? NO Classification: Minor

Citation: 30 TAC Chapter 117, SubChapter E 117.520(c)(2)(A)(ii)(II)

Description: Failure to test within 60 days following installation of NOx control equipment on furnace 3403.

Date: 08/05/2005 (393207) CN600124705

Self Report? NO Classification: Minor

Citation: 30 TAC Chapter 117, SubChapter E 117.520(c)(2)(A)(ii)(II)

Description: Failure to test within 60 days following installation of NOx control equipment on Furnace 4406.

Self Report? NO Classification: Minor

Citation: 30 TAC Chapter 117, SubChapter E 117.520(c)(2)(A)(ii)(II)

Description: Failure to test within 60 days following installation of NOx control equipment on F4410.

Self Report? NO Classification: Minor

Citation: 30 TAC Chapter 117, SubChapter E 117.520(c)(2)(A)(ii)(II)

Description: Failure to test within 60 days following installation of NOx control equipment on Furnace 4401.

Self Report? NO Classification: Minor

Citation: 30 TAC Chapter 117, SubChapter E 117.520(c)(2)(A)(ii)(II)

Description: Failure to test within 60 days following installation of NOx control equipment on Furnace 3401.

Date: 08/05/2005 (392610) CN600124705

Self Report? NO Classification: Minor

Citation: 30 TAC Chapter 117, SubChapter E 117.520(c)(2)(A)(ii)(II)

Description: Failure to test within 60 days following installation of NOx control equipment on Furnace 4404.

Date: 08/10/2005 (404514) CN600124705

Self Report? NO Classification: Moderate

Citation: 30 TAC Chapter 116, SubChapter B 116.115(b)
5C THC Chapter 382, SubChapter A 382.085(b)
TCEQ Permit #2128, GC #8 PERMIT

Description: Failure to prevent a leak in Tower T-301.

Date: 09/13/2005 (431694) CN600124705

Self Report? NO Classification: Minor

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

Description: Failure to provide an adequate ground storage capacity.

Self Report? NO Classification: Minor

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

Description: Failure to provide a minimum pressure tank capacity of 220 gallons.

Date: 11/18/2005 (437299) CN600124705
Self Report? NO Classification: Minor
Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)
3130A, SC No. 4 PERMIT
O02179, ST&C No. 10 OP
Description: Failure to operate within pumping rates of Polyols(KOH) and (IMPACT).
Self Report? NO Classification: Minor
Citation: 30 TAC Chapter 117, SubChapter B 117.213(a)
Description: Failure to install the totalizing fuel flow meter on EGBVC6904.

Date: 12/08/2005 (434728) CN600124705
Self Report? NO Classification: Minor
Citation: 30 TAC Chapter 122, SubChapter C 122.222(k)(3)
Description: Failure to submit the off-permit notification for claiming the permit by rule for flare emissions.
Self Report? NO Classification: Minor
Citation: 30 TAC Chapter 106, SubChapter K 106.261(a)(6)
Description: Failure to register the PBR within 10 of increase in flare emissions.
Self Report? NO Classification: Moderate
Citation: 30 TAC Chapter 101, SubChapter A 101.20(1)
30 TAC Chapter 115, SubChapter D 115.352
30 TAC Chapter 116, SubChapter B 116.115(c)
40 CFR Chapter 60, SubChapter C, PT 60, SubPT VV 60.482-1(a)
49130, S.C. No.5 PERMIT
O-02180, S.C No.1A OP
Description: Failure to follow the fugitive monitoring for 172 valves and 5 pumps in the Isopropanol Unit
Self Report? NO Classification: Minor
Citation: 30 TAC Chapter 115, SubChapter D 115.354(5)
30 TAC Chapter 122, SubChapter B 122.143(4)
O-02180, SC. 1.A OP
Description: Failure to have required information on tags attached to visual fugitive leaks
Self Report? NO Classification: Moderate
Citation: 30 TAC Chapter 101, SubChapter A 101.20(2)
30 TAC Chapter 115, SubChapter D 115.352(4)
30 TAC Chapter 116, SubChapter B 116.115(c)
40 CFR Chapter 60, SubChapter C, PT 60, SubPT VV 60.482-6(a)(1)
49130, SC 5.E PERMIT
O-02180, SC 1.A OP
Description: Failure to cap or plug the five open-ended lines in VOC service
Self Report? NO Classification: Moderate
Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)
49130, S.C 7 PERMIT
O-02180, S.C 11 OP
Description: Failure to follow the procedure described in Appendix P, Section 5.5.1 for monitoring the cooling tower (CT-2401) as required by the permit condition
Self Report? NO Classification: Moderate
Citation: 30 TAC Chapter 122, SubChapter B 122.145(2)(A)
Description: Failure to report the deviations regarding the cooling tower monitoring in the deviation reports

Date: 12/19/2005 (438915) CN600124705
Self Report? NO Classification: Moderate
Citation: 30 TAC Chapter 122, SubChapter C 122.210(a)
Description: Failure to submit the federal operating permit (O-02177) minor revision application concurrent with the permit amendment issued on July 26, 2005 and permit by rules claimed in 1997 and 2002.
Self Report? NO Classification: Moderate
Citation: 22779, SC 1 PERMIT
30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)

O-02177, STC 10 OP
Description: Failure to operate tanks and loading arms within maximum allowable emission rates as permitted in the NSR permit 22779.
Self Report? NO Classification: Moderate
Citation: 22779, SC 8 PERMIT
30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)
O-02177, STC 10 OP

Description: Failure to initiate the fugitive monitoring for 22 valves and 3 pumps in the Polybutadiene Unit.
Self Report? NO Classification: Moderate
Citation: 22779, SC 8.E PERMIT
30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)
O-02177, STC 10 OP

Description: Failure to cap or plug the five open-ended lines in VOC service

Date: 12/31/2005 (440659) CN600124705
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: 02/22/2006 (450109) CN600124705
Self Report? NO Classification: Moderate
Citation: 24887 SC1.E PERMIT
30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)
O02176, SC 15 OP

Description: Failure to cap or plug the eighty five (85) open-ended lines in VOC service

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)

Description: Failure to register the PBRs 106.261 and 106.262 within 10 days of addition of a flare analyzer and failure to make off-permit notification concurrently.

Self Report? NO Classification: Moderate
Citation: 30 TAC Chapter 122, SubChapter B 122.142(b)(2)(B)

Description: Failure to represent the several sources that are subject to 30 TAC 111 rules in the Title V Operating Permit.

Self Report? NO Classification: Moderate
Citation: 24887, SC 1 PERMIT
30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)
O02176, SC 15 OP

Description: Failure to include 19 valves and 39 connectors associated with sample systems and failure to include 5 pumps, 38 valves, 104 connectors, and 4 sample points in the fugitive monitoring database.

Self Report? NO Classification: Moderate
Citation: 30 TAC Chapter 115, SubChapter B 115.142
30 TAC Chapter 122, SubChapter B 122.143(4)
O02176, SC 5 OP

Description: Failure to control the wastewater streams as required by 30 TAC 115.142.

Self Report? NO Classification: Minor
Citation: 30 TAC Chapter 122, SubChapter B 122.143(4)
40 CFR Chapter 60, SubChapter C, PT 60, SubPT Kb 60.113b(b)(5)
O02176, SC 1.A OP

Description: Failure to make the tank seal inspection notification 30 days in advance.

Date: 02/28/2006 (451788) CN600124705
Self Report? NO Classification: Minor
Citation: 30 TAC Chapter 115, SubChapter D 115.352(4)
30 TAC Chapter 116, SubChapter B 116.115(c)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.167(a)(1)
NSR Permit No. 8125, SC 6E PA

Description: Failure to plug two open-ended-lines.
Self Report? NO Classification: Minor
Citation: 30 TAC Chapter 117, SubChapter B 117.213(a)
Description: Failure to install fuel flow meter on Diesel Engine, P-3314.
Self Report? NO Classification: Minor
Citation: 40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.182(d)
Description: Failure to include compressor information in the HON Subpart H Semiannual report.
Self Report? NO Classification: Minor
Citation: 40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.181(a)
Description: Failure to maintain appropriate records of 220 connectors, 6 instrument systems, 4 PSVs, 2 pumps, and 101 valves.

Date: 03/24/2006 (457373) CN600124705

Self Report? NO Classification: Minor
Citation: 30 TAC Chapter 290, SubChapter D 290.45(d)(2)(B)(ii)
Description: Failure to provide an adequate ground storage capacity.
Self Report? NO Classification: Minor
Citation: 30 TAC Chapter 290, SubChapter D 290.45(d)(2)(B)(v)
Description: Failure to provide a minimum pressure tank capacity of 220 gallons.

Date: 03/28/2006 (453139) CN600124705

Self Report? NO Classification: Minor
Citation: 30 TAC Chapter 115, SubChapter D 115.352(4)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.167(a)(1)
5C THC Chapter 382, SubChapter A 382.085(b)
NSR Permit No 2936, SC 10E PA
O-02182 Special Terms and Condition 15 OP

Description: Failed to plug 20 open-ended lines.
Self Report? NO Classification: Minor
Citation: 30 TAC Chapter 116, SubChapter B 116.110(a)(4)
30 TAC Chapter 122, SubChapter B 122.143(4)
30 TAC Chapter 122, SubChapter C 122.222(k)(2)
5C THC Chapter 382, SubChapter A 382.085(b)
O-02181 General Terms and Condition OP

Description: The facility failed to register two tanks and one cooling tower within ten (10) days of change as required during August 19, 2004 through November 22, 2004.

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 63.182(d)
5C THC Chapter 382, SubChapter A 382.085(b)
O-02182 General Terms and Condition OP

Description: Failure to include compressor information in the HON Subpart H semiannual report for the reporting period from February 28, 2005 through August 19, 2005.

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 THC Chapter 382, SubChapter A 382.085(b)
Special Condition No. 10F PA
Special Terms and Condition 15 OP

Description: failure to monitor 59 valves that were marked as unsafe to monitor during the third quarter of 2004 from August 19, 2004 through September 30, 2004.

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

Description: failure to put identification number for the leaking fugitive valves during August 19, 2004 through August 19, 2005.

Self Report? NO Classification: Minor
Citation: 30 TAC Chapter 115, SubChapter D 115.354
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 63.162(c)
 5C THC Chapter 382, SubChapter A 382.085(b)
 Special Terms and Condition 15 OP

Description: failure to include 89 connectors, 27 valves, and 19 pumps in the fugitive monitoring program during the third quarter of 2004 from August 19, 2004 through September 30, 2004.

Self Report? NO **Classification:** Minor
Citation: 30 TAC Chapter 116, SubChapter B 116.110(a)(1)
 30 TAC Chapter 122, SubChapter B 122.143(4)
 5C THC Chapter 382, SubChapter A 382.085(b)
 General Terms and Condition OP

Description: failure to obtain a permit by rule (PBR) for the emission point no. SP-4010.

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

Description: failure to seal the external floating roof tank, TK-3112. The gasket on the rim vent was missing.

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)
 SC No 1 of NSR Permit No. 2936. PA
 Special Terms and Conditions 15 OP

Description: failure to obtain appropriate authorization for storing hydrocarbons for the tanks, TK-3113 and TK-3114.

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)
 Special Condition 1 PA
 Special Terms and Condition 15 OP

Description: failure to comply with the pounds per hour of VOC emission limit for tank No. TK-4002 of TCEQ Air Permit 2936.

Self Report? NO **Classification:** Minor
Citation: 30 TAC Chapter 116, SubChapter B 116.110(a)(1)
 30 TAC Chapter 122, SubChapter B 122.143(4)
 5C THC Chapter 382, SubChapter A 382.085(b)
 General Terms and Conditions OP

Description: failure to obtain a permit by rule (PBR) for the analyzer vent.

Self Report? NO **Classification:** Minor
Citation: 30 TAC Chapter 122, SubChapter B 122.132(a)
 5C THC Chapter 382, SubChapter A 382.085(b)

Description: Failure to include all the emission authorizations for the cooling tower were not represented in the title V permit.

Date: 03/29/2006 (459500) **CN600124705**

Self Report? NO **Classification:** Moderate
Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
 5C THC Chapter 382, SubChapter A 382.085(b)
 TCEQ Permit No. 2128 PERMIT

Description: Failure to prevent the release of unauthorized emissions from a railroad tank car PSV.

Date: 03/31/2006 (455940) **CN600124705**

Self Report? NO **Classification:** Minor
Citation: 30 TAC Chapter 122, SubChapter B 122.142(b)(2)
 5C THC Chapter 382, SubChapter D 382.085(b)

Description: Failure to represent the two sources that are subject to 30 TAC 111 rules in the Title V Operating Permit O-02175.

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)

6245, SC 1 PERMIT
O02175, STC 10 OP
Description: Failure to operate tanks (TK30 & TK31) within maximum allowable emission rates as permitted in the NSR permit 6245.

Self Report? NO Classification: Minor

Citation: 30 TAC Chapter 101, SubChapter A 101.20(1)
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 D 382.085(b)
6245, SC 7,E PERMIT
O02175, STC 10 OP
O02175, STC 1A OP

Description: Failure to cap or plug the thirty-eight (38) open-ended lines in VOC service (C5 recovery unit).

Self Report? NO Classification: Minor

Citation: 30 TAC Chapter 101, SubChapter A 101.20(1)
30 TAC Chapter 122, SubChapter B 122.143(4)
40 CFR Chapter 60, SubChapter C, PT 60, SubPT VV 60.482-5(a)
5C THC Chapter 382, SubChapter D 382.085(b)
O02175, STC 1A OP

Description: Failure to equip the dimer drum feed sampling connection system with closed loop.

Self Report? NO Classification: Minor

Citation: 30 TAC Chapter 101, SubChapter A 101.20(1)
30 TAC Chapter 115, SubChapter D 115.354(5)
30 TAC Chapter 122, SubChapter B 122.143(4)
40 CFR Chapter 60, SubChapter C, PT 60, SubPT VV 60.486(b)(1)
5C THC Chapter 382, SubChapter D 382.085(b)
O02175, STC 1A OP

Description: Failure to have required information on tags attached to visual fugitive leaks

Self Report? NO Classification: Minor

Citation: 30 TAC Chapter 101, SubChapter A 101.20(1)
30 TAC Chapter 115, SubChapter D 115.352
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 60.482-1(a)
5C THC Chapter 382, SubChapter D 382.085(b)
6245, SC 7 PERMIT
O02175, STC 10 OP
O02175, STC 1A OP

Description: Failure to include 2 pumps, 32 valves, and 103 connectors in the C5 recovery unit in fugitive monitoring database.

Date: 05/16/2006 (463873) CN600124705

Self Report? NO Classification: Moderate

Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
5C THC Chapter 382, SubChapter A 382.085(b)
TCEQ Permit No. 2128 PERMIT

Description: Failure to prevent the release of unauthorized emissions from a leaking pipeline due to the removal of a blind.

Date: 05/24/2006 (465260) CN600124705

Self Report? NO Classification: Moderate

Citation: 30 TAC Chapter 122, SubChapter B 122.142(b)(2)
5C THC Chapter 382, SubChapter D 382.085(b)

Description: Failure to correctly represent the HON storage vessel provisions, HON container provisions, and 30 TAC 111 rules in the Title V Operating Permit O-02185.

Self Report? NO Classification: Moderate

Citation: 30 TAC Chapter 115, SubChapter B 115.112(a)(2)(A)
30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)
40 CFR Part 63, Subpart G 63.119(c)(2)(ii)

5C THC Chapter 382, SubChapter D 382.085(b)
O-02185, STC 16 OP
O-02185, STC 1A OP
Permit 6387, SC 2 PERMIT

Description: Failure to equip gasket on sample hatch cover and failure to have physical fasteners on float well cover on external floating roof tank (Tank 26).

Self Report? NO **Classification:** Moderate
Citation: 30 TAC Chapter 115, SubChapter B 115.112(a)(2)(A)
30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)
40 CFR Part 63, Subpart G 63.119(b)(6)
6387, SC 2 PERMIT
O-02185, STC 16 OP
O-02185, STC 1A OP

Description: Failure to cover all the openings on internal floating roof tanks: Tank 37 and Tank 47 and failure to have physical fasteners on float well covers on internal floating roof tanks: Tank 37, 48, and 49.

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 Part 63, Subpart G 63.119(b)(1)
5C THC Chapter 382, SubChapter D 382.085(b)
6387, SC 2 PERMIT
O-02185, STC 1.A OP
O-02185, STC 16 OP

Description: Failure to keep the floating roof of Tank 47 always in contact with liquid surface during the regular operations.

Self Report? NO **Classification:** Moderate
Citation: 30 TAC Chapter 116, SubChapter B 116.110(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)
6387, SC 4.A PERMIT
O-02185, STC 16 OP

Description: Failure to obtain authorization for the emissions resulted from analyzer vents in the MTBE Unit

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)
6387, SC 2 PERMIT
O-02185, STC 1.A OP
O-02185, STC 16 OP

Description: Failure to cap or plug the sixty-one (61) open-ended lines in VOC service in MTBE Unit.

Self Report? NO **Classification:** Minor
Citation: 30 TAC Chapter 115, SubChapter D 115.354(5)
30 TAC Chapter 122, SubChapter B 122.143(4)
5C THC Chapter 382, SubChapter D 382.085(b)
O-02185, STC 1.A OP

Description: Failure to have required information on tags attached to visual fugitive leaks in the MTBE Unit.

Self Report? NO **Classification:** Minor
Citation: 30 TAC Chapter 115, SubChapter D 115.352
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(a)
5C THC Chapter 382, SubChapter D 382.085(b)
6387, SC 5 PERMIT
O-02185, STC 1.A OP
O-02185, STC 16 OP

Description: Failure to include 2 valves in the MTBE Unit in fugitive monitoring database and comply with the fugitive monitoring requirements.

Self Report? NO **Classification:** Moderate

Citation: 30 TAC Chapter 115, SubChapter B 115.142
30 TAC Chapter 122, SubChapter B 122.143(4)
5C THC Chapter 382, SubChapter D 382.085(b)
O-02185, SC 5 OP

Description: Failure to control the one wastewater stream (T-1215) as required by 30 TAC 115.142 in MTBE Unit.

Self Report? NO Classification: Minor

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(2)(C)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT G 63.120(b)(9)
6387, SC 2 PERMIT
O-02185, STC 1.A OP
O-02185, STC 16 OP

Description: Failure to make the tank seal inspection (Tank-26) notification 30 days in advance in MTBE Unit.

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)
6387, SC 2 PERMIT
O-02185, STC 1.A OP
O-02185, STC 16 OP

Description: Failure to comply with HON process wastewater provisions for two containers in MTBE Unit.

Date: 06/26/2006 (464019) CN600124705

Self Report? NO Classification: Moderate

Citation: 00391-000 PERMIT
30 TAC Chapter 319, SubChapter A 319.7(a)

Description: Failure to document the sample collection time and the identify of the sample personnel for the Outfall 001 24 hour composite samples.

Date: 07/28/2006 (484749) CN600124705

Self Report? NO Classification: Moderate

Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
5C THC Chapter 382, SubChapter D 382.085(b)
No. 22779, Special Condition No. 1 PERMIT

Description: Equistar failed to prevent this emissions event

Date: 08/15/2006 (489890) CN600124705

Self Report? NO Classification: Minor

Citation: 30 TAC Chapter 335, SubChapter A 335.6(c)

Description: Failure to update Notice of Registration

Date: 08/16/2006 (457265) CN600124705

Self Report? NO Classification: Moderate

Citation: 30 TAC Chapter 115, SubChapter C 115.212(a)(1)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT G 63.135(e)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT G 63.152(b)
5C THC Chapter 382, SubChapter D 382.085(b)

Description: Failure to control emissions from drum D3075 and from tank TK20.

Self Report? NO Classification: Moderate

Citation: 2128, SC 10E PERMIT
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 63, SubChapter C, PT 63, SubPT H 63.167(a)(1)
5C THC Chapter 382, SubChapter D 382.085(b)
O-02184, ST&C 18 OP
O-02184, ST&C 1A OP

Description: Failure to cap or plug 174 open ended lines in VOC service.
Self Report? NO **Classification:** Moderate
Citation: 40 CFR Chapter 63, SubChapter C, PT 63, SubPT A 63.6(e)(3)(i)
 5C THC Chapter 382, SubChapter D 382.085(b)

Description: Failure to have a Startup/Shutdown/Malfunction plan to address visible emissions from east plant flare.
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 63.163(b)
 5C THC Chapter 382, SubChapter D 382.085(b)
 O-02184, ST&C 1A OP

Description: Failure to conduct monthly monitoring on 4 HON pumps in January 2005.
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 63.166(a)
 5C THC Chapter 382, SubChapter D 382.085(b)
 O-02184, ST&C 1A OP

Description: Failure to equip a sample point with a closed loop system on reactor effluent and T1204 overhead.
Self Report? NO **Classification:** Moderate
Citation: 30 TAC Chapter 115, SubChapter D 115.354(5)
 30 TAC Chapter 115, SubChapter H 115.782(a)
 30 TAC Chapter 122, SubChapter B 122.143(4)
 5C THC Chapter 382, SubChapter D 382.085(b)
 O-02184, ST&C 1H OP

Description: Failure to have identification numbers on the fugitive leak tags attached to 51 components.
Self Report? NO **Classification:** Moderate
Citation: 30 TAC Chapter 116, SubChapter B 116.110(a)(1)
 30 TAC Chapter 122, SubChapter B 122.132(a)
 5C THC Chapter 382, SubChapter D 382.085(b)

Description: Failure to authorize emissions from sampling in the tank farm.
Self Report? NO **Classification:** Moderate
Citation: 2128, SC 10 PERMIT
 30 TAC Chapter 115, SubChapter D 115.352(1)
 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)
 O-02184, ST&C 18 OP
 O-02184, ST&C 1A OP

Description: Failure to include 16 pumps, 45 valves, and 292 connectors in the fugitive monitoring database.
Self Report? NO **Classification:** Moderate
Citation: 30 TAC Chapter 122, SubChapter B 122.143(4)
 40 CFR Chapter 63, SubChapter C, PT 63, SubPT G 63.132(a)
 5C THC Chapter 382, SubChapter D 382.085(b)
 O-02184, ST&C 13 OP

Description: Failure to control emissions from 3 wastewater streams (D-78, D-3055, D-03102).

Date: 11/30/2006 (544284) **CN600124705**
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: 02/01/2007 (538420) **CN600124705**
Self Report? NO **Classification:** Moderate
Citation: 2933 Special Condition 1 PERMIT
 30 TAC Chapter 116, SubChapter B 116.115(c)
 5C THC Chapter 382, SubChapter A 382.085(b)
Description: Failure to prevent process water collection system back-up.

Date: 03/31/2007 (574938) **CN600124705**

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: 04/11/2007 (532608) CN600124705
Self Report? NO Classification: Moderate
Citation: 30 TAC Chapter 122, SubChapter B 122.132(a)
5C THC Chapter 382, SubChapter D 382.085(b)
Description: Failure to include Polyols loading emissions in federal operating permit O-02179.

Date: 04/18/2007 (593172) CN600124705
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: 07/24/2007 (567353) CN600124705
Self Report? NO Classification: Moderate
Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
5C THC Chapter 382, SubChapter D 382.085(b)
No. 1768, Special Condition No. 1 PERMIT
Description: Equistar failed to prevent a hole in a 1/4 inch nipple off of the flow orifice of the charge gas compressor.

Date: 07/31/2007 (607499) CN600124705
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: 07/31/2007 (543338) CN600124705
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)
5C THC Chapter 382, SubChapter D 382.085(b)
FOP O-02175 SC 12 OP
FOP O-02175 SC 1A OP
NSR 6245 SC 7(E) PA
Description: Failure to equip lines in VOC service with caps/plugs from January 24 through December 6, 2006 (NSR 6245; FOP O-02175).
Self Report? NO Classification: Moderate

Citation: 30 TAC Chapter 115, SubChapter D 115.354(5)
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)
FOP O-02175 SC 12 OP
FOP O-02175 SC 1A OP
NSR 6245 SC 7(H) PA
Description: Failure to equip leaking pumps in VOC and HRVOC service with the required tags from January 10 through May 8, 2006 (NSR 6245; FOP O-02175).

Self Report? NO Classification: Moderate
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)
40 CFR Chapter 60, SubChapter C, PT 60, SubPT VV 60.482-2(c)(1)
40 CFR Chapter 60, SubChapter C, PT 60, SubPT VV 60.482-8(c)
5C THC Chapter 382, SubChapter D 382.085(b)
FOP O-02175 SC 12 OP

FOP O-02175 SC 1A OP
NSR 6245 SC 7(I) PA

Description: Failure to repair pumps and connectors within the required time frames (NSR 6245; FOP O-02175).

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 60.487(c)(2)(iv)
5C THC Chapter 382, SubChapter D 382.085(b)
FOP O-02175 SC 1A OP

Description: Failure to submit an accurate semiannual report on August 29, 2006 for fugitive equipment leak components subject to NSPS subpart VV to indicate that leaking pumps were on delay of repair list (NSR 6245; FOP O-02175).

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 60.487(c)(2)(vii)
5C THC Chapter 382, SubChapter D 382.085(b)
FOP O-02175 SC 1A OP

Description: Failure to submit an accurate semiannual report on August 29, 2006 for fugitive equipment leak components subject to NSPS subpart VV to indicate the reason that leaking pumps were on delay of repair list (NSR 6245; FOP O-02175).

Self Report? NO **Classification:** Moderate

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)
40 CFR Chapter 60, SubChapter C, PT 60, SubPT VV 60.482-1(a)
5C THC Chapter 382, SubChapter D 382.085(b)
FOP O-02175 SC 12 OP
FOP O-02175 SC 1A OP
NSR 6245 SC 7 PA

Description: Equistar failed to include 21 connectors and 8 valves in the C5 Recovery LDAR monitoring program (NSR 6245; FOP O-02175).

Date: 11/30/2007 (619407) **CN600124705**

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: 03/06/2008 (610691) **CN600124705**

Self Report? NO **Classification:** Minor

Citation: 30 TAC Chapter 122, SubChapter B 122.143(4)
40 CFR Chapter 60, SubChapter C, PT 60, SubPT Kb 60.112b(a)(1)(iv)
40 CFR Chapter 61, SubChapter C, PT 61, SubPT FF 61.351(a)(1)
5C THSC Chapter 382 382.085(b)
O-02180 Special Condition #1A OP

Description: Failure to have the required bolts on the float well gauges.

Self Report? NO **Classification:** Minor

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

O-02180 Special Condition #1J OP

Description: Failure to conduct the initial and quarterly multi-point calibrations.

Self Report? NO **Classification:** Minor

Citation: 30 TAC Chapter 115, SubChapter H 115.722(d)(2)
30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)
49130 Special Condition #8A PERMIT
5C THSC Chapter 382 382.085(b)
O-02180 Special Condition #1(J) OP
O-02180 Special Condition #11 OP

Description: Failure to not exceed actual flare tip velocity.

Self Report? NO **Classification:** Minor

Citation: 30 TAC Chapter 122, SubChapter B 122.143(4)
40 CFR Chapter 60, SubChapter C, PT 60, SubPT Kb 60.112b(a)(1)(iv)

40 CFR Chapter 60, SubChapter C, PT 60, SubPT Kb 60.112b(a)(1)(v)
 40 CFR Chapter 61, SubChapter C, PT 61, SubPT FF 61.351(a)(1)
 5C THSC Chapter 382 382.085(b)
 O-02180 Special Condition #1A OP
 Description: Failure to seal the tank's, MIPTK2615, vacuum vent that was found open during an annual inspection.

Self Report? NO Classification: Minor
 Citation: 30 TAC Chapter 117, SubChapter B 117.206(l)
 30 TAC Chapter 122, SubChapter B 122.143(4)
 5C THSC Chapter 382 382.085(b)
 O-02180 Special Condition #1(l) OP

Description: Failure to conduct engine testing during appropriate operating hours.

Self Report? NO Classification: Minor
 Citation: 30 TAC Chapter 115, SubChapter H 115.722(d)(1)
 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)
 O-02180 Special Condition #11 OP
 O-02180 Special Condition #1J OP
 Special Condition #8A PERMIT

Description: Velocity to the flare, MIPFL2501, was exceeded during the process of activating the reactor catalyst during nine one hour periods.

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)
 40 CFR Part 60, Subpart VV 60.482-6
 49130 Special Condition #5E PERMIT
 5C THSC Chapter 382 382.085(b)
 O-02180 Special Condition #11 OP
 O-02180 Special Condition #1A OP
 O-02180 Special Condition #1J OP

Description: Failure to prevent one open-ended line found in VOC service.

Self Report? NO Classification: Minor
 Citation: 30 TAC Chapter 115, SubChapter H 115.722(d)(1)
 30 TAC Chapter 116, SubChapter B 116.115(c)
 30 TAC Chapter 122, SubChapter B 122.143(4)
 49130 Special Condition #8A PERMIT
 5C THSC Chapter 382 382.085(b)
 O-02180 Special Condition #11 OP
 O-02180 Special Condition #1J OP

Description: Permit limits to the flare, MIPFL2501, were exceeded due to incorrect factor used in permit calculation.

Date: 03/07/2008 (596061) CN600124705
 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 THSC Chapter 382 382.085(b)
 FOP O-02179 SC 10 OP
 NSR Permit 3130A SC 8E PA
 Description: Failed to seal an open ended line.

Date: 03/27/2008 (611770) CN600124705
 Self Report? NO Classification: Moderate
 Citation: 30 TAC Chapter 335, SubChapter F 335.152(a)(8)
 40 CFR Chapter 264, SubChapter I, PT 264, SubPT J 264.191(a)
 PP II-C-2-h PERMIT

Description: Tank system assessment and certification was not adequate.

Self Report? NO Classification: Moderate
 Citation: 30 TAC Chapter 335, SubChapter F 335.152(a)(8)
 40 CFR Chapter 264, SubChapter I, PT 264, SubPT J 264.193(e)(1)(iii)
 PP-II-C-2-h PERMIT

Description: Coating for the secondary containment showed visible cracks.

Date: 03/31/2008 (689830)

CN600124705

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: 04/04/2008 (610663)

CN600124705

Self Report? NO

Classification: Moderate

Citation: 30 TAC Chapter 122, SubChapter B 122.143(4)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT G 63.119(b)(6)
5C THSC Chapter 382 382.085(b)
Special Condition (SC) #1A OP

Description: Failure to equip the gauge float wells with bolts or fasteners on the covers of Tanks 3102, 3111A, 3111B, and 3113.

Self Report? NO

Classification: Minor

Citation: 30 TAC Chapter 115, SubChapter B 115.112(a)(2)(A)
30 TAC Chapter 122, SubChapter B 122.143(4)
5C THSC Chapter 382 382.085(b)
SC #1A OP

Description: Failure to have tank 3114's piping on the existing internal ladder way closed to the liquid from April 18, 2007 through July 27, 2007.

Self Report? NO

Classification: Moderate

Citation: 30 TAC Chapter 122, SubChapter B 122.143(4)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT G 63.119(b)(1)
5C THSC Chapter 382 382.085(b)
SC #1 PERMIT
SC #s 1 and 15 OP

Description: Failure to have Tank 3102 floating roof set on the roof legs on August 23, 2006. This constitutes a violation of New Source Review (NSR) Permit #2936, Special Condition (SC) #1 and 40 CFR 63.119(b)(1). (B19(g)(1))

Self Report? NO

Classification: Moderate

Citation: 30 TAC Chapter 115, SubChapter H 115.767(1)
30 TAC Chapter 122, SubChapter B 122.143(4)
5C THSC Chapter 382 382.085(b)
SC #1K(iv) OP

Description: Failure to have cooling tower differential pressure fall below 5 psig for one minute on October 7, 2006. (B19(g)(1))

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)
5C THSC Chapter 382 382.085(b)
SC #1A OP
SC #8E PERMIT

Description: Failure to have an open ended line in volatile organic compound (VOC) service on February 9, 2007. This constitutes a violation of NSR Permit #2936, SC #10, 30 TAC 115.352(4), and 40 CFR 63.167(a)(1). (C10)

Date: 05/02/2008 (610690)

CN600124705

Self Report? NO

Classification: Minor

Citation: 30 TAC Chapter 117, SubChapter B 117.203(a)(12)
30 TAC Chapter 122, SubChapter B 122.143(4)
5C THSC Chapter 382 382.085(b)

O-02181 Special Condition #1A OP

Description: Failure to prevent the diesel firewater pumps from exceeding the 100 hour runtime limit based on the rolling 12 month average.

Self Report? NO

Classification: Minor

Citation: 2128 Special Condition #8E PERMIT
24887 Special Condition #1E PERMIT

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)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.167(a)(1)
49120 Special Condition #2D PERMIT
5C THSC Chapter 382 382.085(b)
6245 Special Condition #7E PERMIT
O-02181 Special Condition #1(l) OP
O-02181 Special Condition #1A OP
O-02181 Special Condition #22 OP

Description: Failure to seal 8 open-ended lines in VOC service.
Self Report? NO Classification: Minor
Citation: 30 TAC Chapter 115, SubChapter H 115.764(a)(1)
30 TAC Chapter 122, SubChapter B 122.143(4)
5C THSC Chapter 382 382.085(b)
O-02181 Special Condition #1(l) OP

Description: Failure to perform the yearly preventative maintenance (PM).
Self Report? NO Classification: Minor
Citation: 30 TAC Chapter 115, SubChapter C 115.244
30 TAC Chapter 122, SubChapter B 122.143(4)
5C THSC Chapter 382 382.085(b)
O-02181 Special Condition #6D OP

Description: Failure to conduct the Stage II vapor recovery daily inspection.
Self Report? NO Classification: Minor
Citation: 30 TAC Chapter 106, SubChapter S 106.433(2)(C)
30 TAC Chapter 122, SubChapter B 122.143(4)
5C THSC Chapter 382 382.085(b)
O-02181 Special Condition #22 OP

Description: Failure to properly seal three containers of a solvent that were left open in the unit.
Self Report? NO Classification: Minor
Citation: 30 TAC Chapter 122, SubChapter B 122.143(4)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT G 63.152(f)
5C THSC Chapter 382 382.085(b)
O-02181 Special Condition #1A OP

Description: Failure to maintain continuous monitoring data in historian for the Alkyl Flare volumetric flow.

Date: 06/16/2008 (610615) CN600124705
Self Report? NO Classification: Moderate
Citation: 30 TAC Chapter 115, SubChapter B 115.112(d)(2)(H)
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 G 63.119(b)(1)
5C THSC Chapter 382 382.085(b)
FOP No. O-2183 ST&C 12 OP
Permit No. 8125, SC 1 PERMIT

Description: RE had unauthorized emissions of VOC for Methanol Tank TK-5102.
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 G 63.119(b)(6)
5C THSC Chapter 382 382.085(b)
FOP O-2183 ST&C 12 OP
Permit No. 8125, SC 2B PERMIT

Description: RE failed to ensure that the cap on the gauge float well was kept air-tight with a bolt or fastener on three tanks.

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)
FOP No. O-2183, ST&C 12 OP

FOP No. O-2183, ST&C 1A OP
Permit No. 8125, SC 6 PERMIT

Description: RE had failed to seal 3 open-ended lines in VOC service.

Date: 06/17/2008 (636281) CN600124705

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)
Special Condition #15 OP
Special Condition #1E PERMIT

Description: Failure to seal 20 open-ended lines in VOC 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)
5C THSC Chapter 382 382.085(b)
Special Condition #15 OP
Special Condition #1F PERMIT

Description: Failure to monitor two valves in VOC service.

Date: 07/03/2008 (636094) CN600124705

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)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.167(a)(1)
5C THSC Chapter 382 382.085(b)
SC #18 OP
SC #8E PERMIT
Special Condition (SC) #1A OP

Description: failure to seal twenty-five open ended lines in volatile organic compound service.
(Category C10)

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)
SC #1 PERMIT
SC #18 OP

Description: Failed to comply with the hourly emission limits of 1.65 lbs per hour ("lbs/hr") for VOCs and 0.14 lbs/hr of 1,3 butadiene intermittently from December 11, 2005 to present.

Self Report? NO Classification: Minor

Citation: 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)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.162(f)(1)
5C THSC Chapter 382 382.085(b)
SC #18 OP
SC #1A OP
SC #8I PERMIT

Description: failure to tag a leaking seal.

Self Report? NO Classification: Minor

Citation: 30 TAC Chapter 115, SubChapter D 115.352(2)
30 TAC Chapter 115, SubChapter H 115.782(b)(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 63.174(d)
5C THSC Chapter 382 382.085(b)
SC #1 OP
SC #18 OP
SC #8I PERMIT

Description: Failure to make a first attempt for repair on two leaking components (Category C4 violation).

Self Report? NO Classification: Minor
Citation: 30 TAC Chapter 115, SubChapter H 115.781(b)
30 TAC Chapter 122, SubChapter B 122.143(4)
5C THSC Chapter 382 382.085(b)
SC #1A OP
Description: failure to follow Reference Method 21 for twenty-five components

Date: 07/18/2008 (681438) CN600124705
Self Report? NO Classification: Moderate
Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
5C THSC Chapter 382 382.085(b)
Special Condition #1 PERMIT
Description: Failure to prevent an electrical power loss and the mechanical failure of a Process Safety Valve Bellow which resulted in flaring and a Process Safety Valve Bellow leak.

Date: 07/30/2008 (687221) CN600124705
Self Report? NO Classification: Moderate
Citation: #2933 S.C. 1 PERMIT
30 TAC Chapter 116, SubChapter B 116.115(c)
5C THSC Chapter 382 382.085(b)
Description: Failure to meet the affirmative defense for Incident #108500 regarding a pipe failure in D-4333.

Date: 08/01/2008 (681437) CN600124705
Self Report? NO Classification: Moderate
Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
5C THSC Chapter 382 382.085(b)
Special Condition #1 PERMIT
Description: Failure to prevent a hole in the first feed system line which resulted in a release of volatile organic compounds.

Date: 08/11/2008 (610620) CN600124705
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)
ST&C 1A OP
Description: Failure to collect flair HRVOC samples by the 10th hour after analyzer malfunction.

Self Report? NO Classification: Minor
Citation: 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 THSC Chapter 382 382.085(b)
SC 8H PERMIT
ST&C 10 OP
Description: Failure to tag leaking component in VOC service.

Date: 08/11/2008 (637040) CN600124705
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)
Special Conditions, No. 4A PERMIT
Special Terms and Conditions, No. 18 OP
Special Terms and Conditions, No. 1A OP
Description: Failure to control emissions of VOC from a process safety valve (PSV) 99PVRLS00 on MTBE Tank TK-19.

Self Report? NO Classification: Minor
Citation: 30 TAC Chapter 122, SubChapter B 122.143(4)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT G 63.119(b)(6)
5C THSC Chapter 382 382.085(b)
Special Terms and Conditions, No. 1A OP

Description: Failure to keep the cover on a gauge float well air-tight with a bolt or fastener on tank TK-37.

Self Report? NO Classification: Minor

Citation: 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 63, SubChapter C, PT 63, SubPT H 63.167(a)(1)
5C THSC Chapter 382 382.085(b)
Special Condition No. 6E PERMIT
Special Terms and Conditions, No. 18 OP
Special Terms and Conditions, No. 1H OP

Description: Failure to seal 15 open-ended valves or lines with a cap, blind flange, plug or a second valve.

Date: 08/13/2008 (682388) CN600124705

Self Report? NO Classification: Moderate

Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
5C THSC Chapter 382 382.085(b)
TCEQ Air Permit #2128, SC# 1 PA

Description: Equistar failed to prevent the seal leak from pump P-368B while adjusting the pump shaft during the coupling of the motor to the pump.

Date: 08/27/2008 (638212) CN600124705

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 Part 60, Subpart VV 60.482-6
5C THSC Chapter 382 382.085(b)
FOP O-02175 Special Condition 12 OP
Permit 6245, Special Condition 7H PERMIT

Description: Failure to cap open-ended lines.

Self Report? NO Classification: Moderate

Citation: 30 TAC Chapter 115, SubChapter D 115.354(5)
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 63.162(f)(1)
5C THSC Chapter 382 382.085(b)
FOP No. O-02175, Special Conditions 12 OP
Permit No. 6245, Special Condition 7H PERMIT

Description: Failure to tag compressor seal.

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)
40 CFR Chapter 60, SubChapter C, PT 60, SubPT VV 60.482-7(c)(1)
5C THSC Chapter 382 382.085(b)
FOP No. O-02175, Special Condition 12 OP
Permit 6245, Special Condition 7H PERMIT

Description: Failure to monitor valves.

Date: 08/29/2008 (681367) CN600124705

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)
5C THSC Chapter 382 382.085(b)
FOP O-02174 STC 21 OP
NSR Permit 2933 SC 13E PA

Description: LB failed to seal 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)

5C THSC Chapter 382 382.085(b)
 FOP O-02174 STC 21 OP
 NSR 2933 SC 10 PA
 Description: Failure to continuously monitor the fuel gas.
 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)
 FOP O-2174 STC 21 OP
 NSR 2933 SC 1 PA

Description: Failure to maintain hourly tank (Tk-48008 & Tk-4917) emissions within the MAERT.
 Self Report? NO Classification: Minor
 Citation: 30 TAC Chapter 117, SubChapter B 117.345(b)(1)
 5C THSC Chapter 382 382.085(b)

Description: Failed to submit test notification within required time frame.
 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)
 FOP O-02174 STC 21 OP
 NSR 2933 SC 1 PA

Description: Failure to maintain Tk-48304 emissions within the MAERT, due to operations.
 Self Report? NO Classification: Moderate
 Citation: 30 TAC Chapter 117, SubChapter B 117.310(c)(1)
 5C THSC Chapter 382 382.085(b)

Description: Failure to maintain furnace CO emissions within allowable limits.
 Self Report? NO Classification: Minor
 Citation: 30 TAC Chapter 122, SubChapter B 122.143(4)
 40 CFR Chapter 63, SubChapter C, PT 63, SubPT G 63.119(b)(6)
 5C THSC Chapter 382 382.085(b)
 FOP O-2174 STC 1A OP

Description: Failure to install proper bolts on floating roof tanks
 Self Report? NO Classification: Minor
 Citation: 30 TAC Chapter 117, SubChapter B 117.310(c)(1)
 5C THSC Chapter 382 382.085(b)

Description: Failure to maintain diesel engine CO emissions less than limit.
 Self Report? NO Classification: Moderate
 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 TT 63.1004(a)(1)(i)
 5C THSC Chapter 382 382.085(b)
 FOP O-02174 STC 1E OP
 NSR 2933 SC 13F PA

Description: Failure to monitor valves in VOC/EMACT service
 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 UU 63.1027(b)
 5C THSC Chapter 382 382.085(b)
 FOP O-2174 STC 21 OP
 NSR 2933 SC 15 PA
 NSR 2933 SC 16 PA

Description: Failure to monitor connectors in VOC service.
 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 THSC Chapter 382 382.085(b)
 FOP O-2174 STC 1A OP

Description: Failure to continuously record parameters.
 Self Report? NO Classification: Minor
 Citation: 30 TAC Chapter 115, SubChapter D 115.354(5)
 5C THSC Chapter 382 382.085(b)
 FOP O-2174 STC 1A OP
 NSR 2933 SC 13 H PA

Description: Failure to tag leaking components

Date: 09/09/2008 (681362) CN600124705

Self Report? NO Classification: Moderate
Citation: 30 TAC Chapter 115, SubChapter H 115.725(d)(2)(A)(i)
5C THSC Chapter 382 382.085(b)

Description: Failed to calibrate OP-1 GC Analyzer within specifications

Self Report? NO Classification: Moderate
Citation: 30 TAC Chapter 115, SubChapter H 115.725(d)(3)
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)
FOP O-1426 STC 22 OP

NSR Permit 1768 SC 13D PA

Description: Failed to maintain the OP-1 GC Analyzer downtime to less than 5%.

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 THSC Chapter 382 382.085(b)
FOP 1426 General Terms and Conditions OP

Description: Failed to report all instances of deviations.

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 UU 63.1033(b)(1)
5C THSC Chapter 382 382.085(b)
FOP O-1426 STC 22 OP
NSR Permit 1768 SC 14E PA

Description: Failed to maintain a seal on open-ended lines.

Self Report? NO Classification: Minor
Citation: 30 TAC Chapter 115, SubChapter H 115.722(c)(1)
5C THSC Chapter 382 382.085(b)

Description: Failed to maintain HRVOC emissions within 1,200 lbs/hr cap.

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)
FOP O-1426 STC 22 OP
NSR Permit 1768 SC 10 PA

Description: Failed to continuously monitor the fuel gas.

Self Report? NO Classification: Minor
Citation: 30 TAC Chapter 117, SubChapter B 117.345(c)
5C THSC Chapter 382 382.085(b)

Description: Failed to submit test report within 60 days.

Self Report? NO Classification: Minor
Citation: 30 TAC Chapter 115, SubChapter D 115.354(5)
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 63.181(b)
5C THSC Chapter 382 382.085(b)
FOP O-1426 STC 1A OP
FOP O-1426 STC 22 OP
NSR Permit 1768 SC 14H PA

Description: Failed to tag a leaking component, upon discovery.

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)
FOP O-1426 STC 22 OP
NSR Permit 1768 SC 5E PA

Description: Failed to install submerged fill pipe on storage tanks.

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

40 CFR Chapter 60, SubChapter C, PT 60, SubPT K 60.112(a)(1)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT G 63.119(b)(6)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT WW 63.1063(a)(2)(vi)
5C THSC Chapter 382 382.085(b)
FOP O-1426 STC 1A OP

Description: Failed to install float well gauge bolts.
Self Report? NO Classification: Minor
Citation: 30 TAC Chapter 117, SubChapter B 117.345(b)(2)
5C THSC Chapter 382 382.085(b)

Description: Failed to submit post RATA within 15 days.
Self Report? NO Classification: Minor
Citation: 30 TAC Chapter 115, SubChapter H 115.766(a)(6)
5C THSC Chapter 382 382.085(b)

Description: Failed to complete the HRVOC Corrective Action Plan.
Self Report? NO Classification: Minor

Citation: 30 TAC Chapter 117, SubChapter B 117.340(f)(1)
30 TAC Chapter 117, SubChapter G 117.8100(a)(1)(C)
5C THSC Chapter 382 382.085(b)

Description: Failed to perform Cylinder Gas Audit in accordance with audit specifications.
Self Report? NO Classification: Minor
Citation: 30 TAC Chapter 117, SubChapter G 117.8140(b)
5C THSC Chapter 382 382.085(b)

Description: Failed to test diesel engine on a quarterly 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 THSC Chapter 382 382.085(b)
FOP O-1426 STC 1A OP

Description: Failed to continuously record parameters.
Self Report? NO Classification: Minor
Citation: 30 TAC Chapter 115, SubChapter H 115.782(c)(2)(A)(i)
5C THSC Chapter 382 382.085(b)

Description: Failed to conduct Extra-Ordinary Efforts.

Date: 10/31/2008 (727385) CN600124705
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: 10/31/2008 (705305) CN600124705
Self Report? NO Classification: Minor
Citation: 30 TAC Chapter 122, SubChapter B 122.143(4)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT G 63.119(b)(6)
5C THSC Chapter 382 382.085(b)
FOP O-2174 STC 1A OP
Description: Failure to install proper bolts on floating roof tanks

Date: 11/30/2008 (727386) CN600124705
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: 12/05/2008 (707275) CN600124705
Self Report? NO Classification: Moderate
Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
5C THSC Chapter 382 382.085(b)
TCEQ Air Permit #1768, SC #1 PA
Description: Equistar failed to prevent the exchanger leak into Olefins 1 Cooling Tower which resulted in this emissions event.
Self Report? NO Classification: Moderate
Citation: 30 TAC Chapter 101, SubChapter F 101.201(a)(1)(B)

5C THSC Chapter 382 382.085(b)
Description: Equistar failed to report the emissions event within 24 hours of discovery.
Date: 01/09/2009 (721591) CN600124705
Self Report? NO Classification: Moderate
Citation: 30 TAC Chapter 111, SubChapter A 111.111(a)(1)(B)
5C THSC Chapter 382 382.085(b)
Description: Equistar failed to prevent excess opacity during an abrasive transfer.

Date: 01/16/2009 (709781) CN600124705
Self Report? NO Classification: Minor
Citation: 30 TAC Chapter 115, SubChapter B 115.122(a)(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 A 60.18(c)(3)(ii)
5C THSC Chapter 382 382.085(b)
NSR 49130, Special Condition 8A PERMIT
O-02180 Special Condition 11 OP

Description: Failure to maintain the IPOH flare above the minimum net heating value of 300 BTU/scf for four one-hour periods on 10/26/2007.

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)
5C THSC Chapter 382 382.085(b)
O-02180 Special Condition 1(A) OP

Description: Failure to conduct monthly pump monitoring on 23 pumps in the MIPFG unit.

Self Report? NO Classification: Moderate
Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)
49130, Special Condition 1 PERMIT
5C THSC Chapter 382 382.085(b)
O-02180 Special Condition 11 OP

Description: Failure to stay within their permitted emissions limits in the MAERT.

Self Report? NO Classification: Minor
Citation: 30 TAC Chapter 122, SubChapter B 122.143(4)
40 CFR Chapter 60, SubChapter C, PT 60, SubPT Kb 60.112b(a)(1)(iv)
5C THSC Chapter 382 382.085(b)
O-02180, Special Condition 1(A) OP

Description: Failure to maintain the required bolt on the float well gauge on tank TK-3110, Unit ID MIPTK3310, and tank TK-2615, Unit ID MIPTK2615.

Date: 04/28/2009 (737713) CN600124705
Self Report? NO Classification: Minor
Citation: 30 TAC Chapter 101, SubChapter F 101.201(b)(1)(H)
5C THSC Chapter 382 382.085(b)
Description: Equistar Chemicals LP (Equistar), Channelview Complex, failed to provide the permit number governing the facilities involved in the emissions event.

Self Report? NO Classification: Moderate
Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
5C THSC Chapter 382 382.085(b)
Special Condition #1 PERMIT

Description: Equistar failed to prevent unauthorized emissions, by a leak due to improper installation, incorrect selection of the gasket, and the pre-existing piping misalignment in its PolyBD unit.

Date: 05/04/2009 (738986) CN600124705
Self Report? NO Classification: Minor
Citation: 30 TAC Chapter 319, SubChapter A 319.11(b)
Description: Failure to utilize the proper analytical methods and techniques for total chlorine residual.

Date: 07/03/2009 (747361) CN600124705

Self Report? NO Classification: Minor
 Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
 5C THSC Chapter 382 382.085(b)
 No. 2933, Special Condition #1 PERMIT
 Description: Failure to preve unauthorized emissions; specifically, Equistar failed to maintain fuel gas to Superheaters F-48001A/B resulting in a shutdown, causing the CPI Separator vent stream to route 48.5 pounds of unauthorized Volatile Organic Compounds (VOCs) to the atmosphere.

Date: 07/07/2009 (744818) CN600124705

Self Report? NO Classification: Minor
 Citation: 30 TAC Chapter 111, SubChapter A 111.111(a)(4)(A)
 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)(1)
 40 CFR Chapter 63, SubChapter C, PT 63, SubPT A 63.11(b)(4)
 5C THSC Chapter 382 382.085(b)
 Special Condition 4C PERMIT
 Special Terms and Conditions 1A OP
 Special Terms and Conditions 22 OP
 Description: Failure to maintain steam going to flare resulting in a smoking flare. (CATEGORY C4 violation)

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)
 40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.163(b)(1)
 5C THSC Chapter 382 382.085(b)
 Special Terms and Coniditions 1A OP
 Description: Failure to conduct monthly pump monitoring on eleven (11) pumps. (CATEGORY C1 violation)

Self Report? NO Classification: Minor
 Citation: 30 TAC Chapter 117, SubChapter B 117.340(j)
 30 TAC Chapter 122, SubChapter B 122.143(4)
 5C THSC Chapter 382 382.085(b)
 Special Terms and Conditions 1A OP
 Special Terms and Conditions 7B OP
 Description: Failure to maintain the run time meter on Unit ID EUTG1111. (CATEGORY C4 violation)

Self Report? NO Classification: Moderate
 Citation: 30 TAC Chapter 111, SubChapter B 111.205(c)
 30 TAC Chapter 122, SubChapter B 122.143(4)
 5C THSC Chapter 382 382.085(b)
 Special Terms and Conditions 3Fi OP
 Description: Failure to provide fire extinguisher training notifications to the TCEQ and the local pollution control agency (Harris County) from 03/14/2007 through 03/27/2008. (CATEGORY B3 violation)

Self Report? NO Classification: Minor
 Citation: 30 TAC Chapter 106, SubChapter T 106.454(3)(B)
 30 TAC Chapter 115, SubChapter E 115.412(1)(A)
 5C THSC Chapter 382 382.085(b)
 Special Terms and Conditions 22 OP
 Description: Failure to close the lid on the part washer after use. (CATEGORY C4 violation)

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 THSC Chapter 382 382.085(b)
 General Terms and Conditions OP
 Description: Failure to report all deviations during the deviation reporting period. (CATEGORY C3 violation)

Self Report? NO Classification: Moderate
 Citation: 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)
 Special Terms and Conditions 23 OP

Description: Failure to maintain emissions on Unit ID ZMSENAIS during usage. (CATEGORY B14 violation)

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 FF 61.356(j)(7)
5C THSC Chapter 382 382.085(b)
Special Condition 4B PERMIT
Special Terms and Conditions 1A OP
Special Terms and Conditions 22 OP

Description: Failure to maintain flare pilot flame records. (CATEGORY C3 violation)

Self Report? NO Classification: Minor

Citation: 30 TAC Chapter 117, SubChapter B 117.310(c)(1)
30 TAC Chapter 122, SubChapter B 122.143(4)
5C THSC Chapter 382 382.085(b)
Special Terms and Conditions 1A OP

Description: Failure to maintain emissions on Unit ID ZMSENAIS during a quarterly stack test. (CATEGORY C4 violation)

Date: 08/06/2009 (747389) CN600124705

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)
Special Condition 11E PERMIT
Special Terms and Conditions 10 OP

Description: Failure to maintain lines resulting in open ended lines. (CATEGORY C10)

F. Environmental audits.

Notice of Intent Date: 07/26/2005 (453654)

Disclosure Date: 10/06/2005

Viol. Classification: Moderate

Citation: 30 TAC Chapter 335, SubChapter A 335.6(c)

Description: Failure to update NOR.

Viol. Classification: Moderate

Citation: 30 TAC Chapter 335, SubChapter C 335.69(a)(1)(B)

Description: Failure to classify waste prior to disposal.

Notice of Intent Date: 10/06/2005 (434934)

No DOV Associated

Notice of Intent Date: 11/28/2006 (534269)

No DOV Associated

Notice of Intent Date: 07/30/2007 (593548)

No DOV Associated

Notice of Intent Date: 08/16/2007 (593550)

No DOV Associated

Notice of Intent Date: 08/16/2007 (593554)

No DOV Associated

Notice of Intent Date: 10/02/2007 (595562)

Disclosure Date: 10/25/2007

Viol. Classification: Moderate

Citation: 40 CFR Chapter 61, SubChapter C, PT 61, SubPT FF 61.343
40 CFR Chapter 61, SubChapter C, PT 61, SubPT FF 61.349
40 CFR Chapter 63, SubChapter C, PT 63, SubPT G 63.148
40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.172

Rqmt Prov: PERMIT Operating Permit O-2181

Description: Failed to comply with Method 21 for regulated HON group 1 wastewater closed vent systems.

Viol. Classification: Moderate

Citation: 30 TAC Chapter 115, SubChapter D 115.352
30 TAC Chapter 115, SubChapter H 115.786
40 CFR Chapter 60, SubChapter C, PT 60, SubPT VV 60.482-1
40 CFR Part 60, Subpart VV 60.482-10
40 CFR Part 60, Subpart VV 60.482-4
40 CFR Part 60, Subpart VV 60.482-7
40 CFR Part 60, Subpart VV 60.485
40 CFR Part 60, Subpart VV 60.487
40 CFR Chapter 61, SubChapter C, PT 61, SubPT I 61.112
40 CFR Chapter 61, SubChapter C, PT 61, SubPT V 61.242-1
40 CFR Part 61, Subpart V 61.242-4
40 CFR Part 61, Subpart V 61.242-7
40 CFR Chapter 63, SubChapter C, PT 63, SubPT UU 63.1022
40 CFR Chapter 63, SubChapter C, PT 63, SubPT UU 63.1031
40 CFR Chapter 63, SubChapter C, PT 63, SubPT UU 63.1038
40 CFR Chapter 63, SubChapter C, PT 63, SubPT UU 63.1039
40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.162
40 CFR Part 63, Subpart H 63.174
40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.181
40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.182

Description: Failure to always perform initial and periodic monitoring and there were instances where new or replaced components were not monitored.

Viol. Classification: Moderate

Citation: 40 CFR Chapter 60, SubChapter C, PT 60, SubPT K 60.112
40 CFR Chapter 60, SubChapter C, PT 60, SubPT VV 60.482-1
40 CFR Part 60, Subpart VV 60.482-10
40 CFR Part 60, Subpart VV 60.482-4
40 CFR Part 60, Subpart VV 60.482-7
40 CFR Part 60, Subpart VV 60.485
40 CFR Part 60, Subpart VV 60.487
40 CFR Chapter 61, SubChapter C, PT 61, SubPT V 61.242-1
40 CFR Chapter 61, SubChapter C, PT 61, SubPT V 61.242-11
40 CFR Part 61, Subpart V 61.242-4
40 CFR Part 61, Subpart V 61.242-7
40 CFR Chapter 61, SubChapter C, PT 61, SubPT V 61.245
40 CFR Chapter 61, SubChapter C, PT 61, SubPT V 61.247
40 CFR Chapter 63, SubChapter C, PT 63, SubPT UU 63.1022
40 CFR Chapter 63, SubChapter C, PT 63, SubPT UU 63.1031
40 CFR Chapter 63, SubChapter C, PT 63, SubPT UU 63.1034
40 CFR Chapter 63, SubChapter C, PT 63, SubPT UU 63.1038
40 CFR Chapter 63, SubChapter C, PT 63, SubPT UU 63.1039
40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.162

- 40 CFR Part 63, Subpart H 63.174
- 40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.181
- 40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.182

Description: Failure to complete instances of first repair attempts and final repair attempts within the required timeframes.

Viol. Classification: Moderate

- Citation:
- 40 CFR Chapter 60, SubChapter C, PT 60, SubPT VV 60.482-1
 - 40 CFR Part 60, Subpart VV 60.482-10
 - 40 CFR Part 60, Subpart VV 60.482-4
 - 40 CFR Part 60, Subpart VV 60.482-7
 - 40 CFR Part 60, Subpart VV 60.485
 - 40 CFR Part 60, Subpart VV 60.487
 - 40 CFR Chapter 61, SubChapter C, PT 61, SubPT I 61.112
 - 40 CFR Chapter 61, SubChapter C, PT 61, SubPT V 61.242-1
 - 40 CFR Chapter 61, SubChapter C, PT 61, SubPT V 61.242-11
 - 40 CFR Part 61, Subpart V 61.242-4
 - 40 CFR Part 61, Subpart V 61.242-7
 - 40 CFR Chapter 61, SubChapter C, PT 61, SubPT V 61.245
 - 40 CFR Chapter 61, SubChapter C, PT 61, SubPT V 61.247
 - 40 CFR Chapter 63, SubChapter C, PT 63, SubPT UU 63.1022
 - 40 CFR Chapter 63, SubChapter C, PT 63, SubPT UU 63.1031
 - 40 CFR Chapter 63, SubChapter C, PT 63, SubPT UU 63.1034
 - 40 CFR Chapter 63, SubChapter C, PT 63, SubPT UU 63.1038
 - 40 CFR Chapter 63, SubChapter C, PT 63, SubPT UU 63.1039
 - 40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.162
 - 40 CFR Part 63, Subpart H 63.174
 - 40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.181
 - 40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.182

Description: Failure to properly classify equipment leaks. According to the records reviewed there were instances where equipment leaks were classified as "Repair Delayed" without meeting the applicable Delay of Repair requirements.

Viol. Classification: Moderate

- Citation:
- 30 TAC Chapter 115, SubChapter D 115.352
 - 30 TAC Chapter 115, SubChapter D 115.356
 - 30 TAC Chapter 115, SubChapter H 115.780
 - 40 CFR Chapter 60, SubChapter C, PT 60, SubPT VV 60.482-1
 - 40 CFR Part 60, Subpart VV 60.482-10
 - 40 CFR Part 60, Subpart VV 60.482-4
 - 40 CFR Part 60, Subpart VV 60.482-7
 - 40 CFR Part 60, Subpart VV 60.485
 - 40 CFR Part 60, Subpart VV 60.487
 - 40 CFR Chapter 61, SubChapter C, PT 61, SubPT I 61.112
 - 40 CFR Chapter 61, SubChapter C, PT 61, SubPT V 61.242-1
 - 40 CFR Chapter 61, SubChapter C, PT 61, SubPT V 61.242-11
 - 40 CFR Part 61, Subpart V 61.242-4
 - 40 CFR Part 61, Subpart V 61.242-7
 - 40 CFR Chapter 61, SubChapter C, PT 61, SubPT V 61.245
 - 40 CFR Chapter 61, SubChapter C, PT 61, SubPT V 61.247
 - 40 CFR Chapter 63, SubChapter C, PT 63, SubPT UU 63.1022
 - 40 CFR Chapter 63, SubChapter C, PT 63, SubPT UU 63.1031
 - 40 CFR Chapter 63, SubChapter C, PT 63, SubPT UU 63.1034
 - 40 CFR Chapter 63, SubChapter C, PT 63, SubPT UU 63.1038
 - 40 CFR Chapter 63, SubChapter C, PT 63, SubPT UU 63.1039
 - 40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.162
 - 40 CFR Part 63, Subpart H 63.174
 - 40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.181
 - 40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.182

Description: Failure to identify specific equipment for inclusion in the LDAR program and apply the appropriate regulatory applicability to each component in the LDAR database.

Viol. Classification: Moderate

Citation: 30 TAC Chapter 115, SubChapter D 115.352
30 TAC Chapter 115, SubChapter D 115.356
30 TAC Chapter 115, SubChapter H 115.780
40 CFR Chapter 60, SubChapter C, PT 60, SubPT VV 60.482-1
40 CFR Part 60, Subpart VV 60.482-10
40 CFR Part 60, Subpart VV 60.482-4
40 CFR Part 60, Subpart VV 60.482-7
40 CFR Part 60, Subpart VV 60.485
40 CFR Part 60, Subpart VV 60.487
40 CFR Chapter 61, SubChapter C, PT 61, SubPT I 61.112
40 CFR Chapter 61, SubChapter C, PT 61, SubPT V 61.242-1
40 CFR Chapter 61, SubChapter C, PT 61, SubPT V 61.242-11
40 CFR Part 61, Subpart V 61.242-4
40 CFR Part 61, Subpart V 61.242-7
40 CFR Chapter 61, SubChapter C, PT 61, SubPT V 61.245
40 CFR Chapter 61, SubChapter C, PT 61, SubPT V 61.247
40 CFR Chapter 63, SubChapter C, PT 63, SubPT UU 63.1022
40 CFR Chapter 63, SubChapter C, PT 63, SubPT UU 63.1031
40 CFR Chapter 63, SubChapter C, PT 63, SubPT UU 63.1034
40 CFR Chapter 63, SubChapter C, PT 63, SubPT UU 63.1038
40 CFR Chapter 63, SubChapter C, PT 63, SubPT UU 63.1039
40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.162
40 CFR Part 63, Subpart H 63.174
40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.181

Description: Failure to properly maintain records, specifically: Daily calibration records and LDAR records requiring stream composition data.

Notice of Intent Date: 10/04/2007 (598705)

Disclosure Date: 07/03/2008

Viol. Classification: Minor

Citation: 40 CFR Chapter 136, SubChapter D, PT 136 136.1(b)

Rqmt Prov: PERMIT TPDES0003531

Description: Internal chain-of custodies in the years 2006, 2007 and 2008 were missing required information.

Notice of Intent Date: 10/04/2007 (598710)

Disclosure Date: 07/03/2008

Viol. Classification: Moderate

Rqmt Prov: PERMIT Operating Permit O-2181

Description: Failure to comply with Title V Operating Permit O-2181, Special Condition 31.

Notice of Intent Date: 10/04/2007 (598714)

No DOV Associated

Notice of Intent Date: 04/07/2008 (654966)

No DOV Associated

Notice of Intent Date: 06/18/2008 (688531)

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



Penalty Calculation Worksheet (PCW)

Policy Revision 2 (September 2002)

PCW Revision October 30, 2008

ICEQ

DATES	Assigned	28-Sep-2009	Screening	8-Oct-2009	EPA Due	20-Jun-2010
	PCW	6-Jan-2010				

RESPONDENT/FACILITY INFORMATION

Respondent	Equistar Chemicals, LP		
Reg. Ent. Ref. No.	RN100542281		
Facility/Site Region	12-Houston	Major/Minor Source	Major

CASE INFORMATION

Enf./Case ID No.	38455	No. of Violations	2
Docket No.	2009-1593-AIR-E	Order Type	1660
Media Program(s)	Air	Government/Non-Profit	No
Multi-Media		Enf. Coordinator	John Muennink
		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

ADJUSTMENTS (+/-) TO SUBTOTAL 1

Subtotals 2-7 are obtained by multiplying the Total Base Penalty (Subtotal 1) by the indicated percentage.

Compliance History 332.0% Enhancement Subtotals 2, 3, & 7

Notes: Enhancement due to 37 NOVs with same or similar violations, 34 NOVs with unrelated violations, two Findings Orders, one 1660 Agreed Order and one Court Order with a denial of liability. Reduction due to 13 notice of audit letters submitted and four disclosures of violations.

Culpability No 0.0% Enhancement Subtotal 4

Notes: The Respondent does not meet the culpability criteria.

Good Faith Effort to Comply Total Adjustments Subtotal 5

Economic Benefit 0.0% Enhancement* Subtotal 6

Total EB Amounts \$135
Approx. Cost of Compliance \$3,500
*Capped at the Total EB \$ Amount

SUM OF SUBTOTALS 1-7 Final Subtotal

OTHER FACTORS AS JUSTICE MAY REQUIRE 0.0% Adjustment

Reduces or enhances the Final Subtotal by the indicated percentage.

Notes

Final Penalty Amount

STATUTORY LIMIT ADJUSTMENT Final Assessed Penalty

DEFERRAL 20.0% Reduction Adjustment

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

Notes

Deferral offered for expedited settlement.

PAYABLE PENALTY

Screening Date 8-Oct-2009

Docket No. 2009-1593-AIR-E

PCW

Respondent Equistar Chemicals, LP

Policy Revision 2 (September 2002)

Case ID No. 38455

PCW Revision October 30, 2008

Reg. Ent. Reference No. RN100542281

Media [Statute] Air

Enf. Coordinator John Muennink

Compliance History Worksheet

>> Compliance History Site Enhancement (Subtotal 2)

Component	Number of...	Enter Number Here	Adjust.
NOVs	Written NOVs with same or similar violations as those in the current enforcement action (number of NOVs meeting criteria)	37	185%
	Other written NOVs	34	68%
Orders	Any agreed final enforcement orders containing a denial of liability (number of orders meeting criteria)	1	20%
	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	2	50%
Judgments and Consent Decrees	Any non-adjudicated final court judgments or consent decrees containing a denial of liability of this state or the federal government (number of judgements or consent decrees meeting criteria)	1	30%
	Any adjudicated final court judgments and default judgments, or non-adjudicated final court judgments or consent decrees without a denial of liability, of this state or the federal government	0	0%
Convictions	Any criminal convictions of this state or the federal government (number of counts)	0	0%
Emissions	Chronic excessive emissions events (number of events)	0	0%
Audits	Letters notifying the executive director of an intended audit conducted under the Texas Environmental, Health, and Safety Audit Privilege Act, 74th Legislature, 1995 (number of audits for which notices were submitted)	13	-13%
	Disclosures of violations under the Texas Environmental, Health, and Safety Audit Privilege Act, 74th Legislature, 1995 (number of audits for which violations were disclosed)	4	-8%

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) 332%

>> 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

Enhancement due to 37 NOVs with same or similar violations, 34 NOVs with unrelated violations, two Findings Orders, one 1660 Agreed Order and one Court Order with a denial of liability. Reduction due to 13 notice of audit letters submitted and four disclosures of violations.

Total Adjustment Percentage (Subtotals 2, 3, & 7) 332%

Screening Date 8-Oct-2009

Docket No. 2009-1593-AIR-E

PCW

Respondent Equistar Chemicals, LP

Policy Revision 2 (September 2002)

Case ID No. 38465

PCW Revision October 30, 2008

Reg. Ent. Reference No. RN100542281

Media [Statute] Air

Enf. Coordinator John Muennink

Violation Number 1

Rule Cite(s) 30 Tex. Admin. Code § 116.115(c), Tex. Health & Safety Code § 382.086(b) and Permit No. 2128, Special Condition No. 1

Violation Description Failed to prevent unauthorized emissions. Specifically, the Respondent released 4,371 pounds ("lbs") of volatile organic compounds, including 1,970 lbs of the Hazardous Air Pollutant 1,3-butadiene from Tank 6 in the East Plant Tank Farm during an avoidable emissions event (Incident No. 125702) that began June 17, 2009 and lasted four minutes. A two inch vent nozzle became plugged resulting in an increase in pressure in Tank 6. The Respondent was unable to detect the rise in pressure in Tank 6 until a pressure safety valve released the emissions to the atmosphere. Since this emissions event could have been avoided by better maintenance practices and the final report was incomplete, 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

Table with columns: Release (Actual, Potential), Harm (Major, Moderate, Minor), and Percent (50%).

>> Programmatic Matrix

Table with columns: Falsification, Major, Moderate, Minor, and Percent (0%).

Matrix Notes Human health or the environment (Inc) has been exposed to a significant amount of pollutants that do not exceed levels protective of human health or environmental receptors.

Adjustment \$5,000

\$5,000

Violation Events

Number of Violation Events 1 Number of violation days 1

Table for frequency: daily, weekly, monthly (marked with x), quarterly, semiannual, annual, single event.

Violation Base Penalty \$5,000

One monthly event is recommended based on the emissions event that occurred on June 17, 2009.

Good Faith Efforts to Comply

0.0% Reduction \$0

Table for Good Faith Efforts: Extraordinary, Ordinary, N/A (marked with x).

Notes The Respondent does not meet the good faith criteria for this violation.

Violation Subtotal \$5,000

Economic Benefit (EB) for this violation

Statutory Limit Test

Estimated EB Amount \$79

Violation Final Penalty Total \$21,600

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

Economic Benefit Worksheet

Respondent Equistar Chemicals, LP
Case ID No. 38455
Reg. Ent. Reference No. RN100542281
Media Air
Violation No. 1

Percent Interest	Years of Depreciation
5.0	15

Item Description	Item Cost	Date Required	Final Date	Yrs	Interest Saved	Onetime Costs	EB Amount
Delayed Costs							
Equipment				0.00	\$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)	\$2,000	17-Jun-2009	31-Mar-2010	0.79	\$79	n/a	\$79

Notes for DELAYED costs

Estimated expense to implement measures designed to ensure the proper maintenance of vent lines and nozzles. The Date Required is the date of the emissions event. The Final Date is the date that corrective measures are estimated to be 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

\$79

Screening Date 8-Oct-2009

Docket No. 2009-1593-AIR-E

PCW

Respondent Equistar Chemicals, LP

Policy Revision 2 (September 2002)

Case ID No. 38455

PCW Revision October 30, 2008

Reg. Ent. Reference No. RN100542281

Media [Statute] Air

Enf. Coordinator John Muennink

Violation Number 2

Rule Cite(s)

30 Tex. Admin. Code § 101.201(b)(1)(H) and Tex. Health & Safety Code § 382.085(b)

Violation Description

Failed to submit an administratively complete and accurate final report for Incident No. 125702. Specifically, the final report submitted on June 30, 2009 did not include the permit number for the facility that experienced the upset.

Base Penalty \$10,000

>> Environmental, Property and Human Health Matrix

Release	Harm			Percent
	Major	Moderate	Minor	
Actual				0%
Potential				

>> Programmatic Matrix

Falsification	Major	Moderate	Minor	Percent
			x	1%

Matrix Notes

The Respondent met at least 70% of the rule requirement.

Adjustment \$9,900

\$100

Violation Events

Number of Violation Events 1 Number of violation days 1

mark only one with an x	daily	
	weekly	
	monthly	
	quarterly	
	semiannual	
	annual	
	single event	x

Violation Base Penalty \$100

One single event is recommended based on the report submitted on June 30, 2009.

Good Faith Efforts to Comply

	0.0% Reduction	\$0
	Before NOV	NOV to EDPRP/Settlement Offer
Extraordinary		
Ordinary		
N/A	x	(mark with x)

Notes

The Respondent does not meet the good faith criteria for this violation.

Violation Subtotal \$100

Economic Benefit (EB) for this violation

Statutory Limit Test

Estimated EB Amount \$56

Violation Final Penalty Total \$432

This violation Final Assessed Penalty (adjusted for limits) \$432

Economic Benefit Worksheet

Respondent Equistar Chemicals, LP
Case ID No. 38455
Reg. Ent. Reference No. RN100542281
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
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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	\$1,500	1-Jul-2009	31-Mar-2010	0.75	\$56	n/a	\$56
Remediation/Disposal				0.00	\$0	n/a	\$0
Permit Costs				0.00	\$0	n/a	\$0
Other (as needed)				0.00	\$0	n/a	\$0

Notes for DELAYED costs
 Estimated expense to ensure the proper reporting of emissions events. The Date Required is the date that the final report was due. The Final Date is the date that corrective measures are estimated to be 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

\$1,500

TOTAL

\$56

Compliance History Report Pending

Customer/Respondent/Owner-Operator: CN600124705 Equistar Chemicals, LP Classification: AVERAGE Rating: 2.95
Regulated Entity: RN100542281 CHANNELVIEW COMPLEX Classification: HIGH Site Rating: 0.00

ID Number(s):		ACCOUNT NUMBER	
	AIR OPERATING PERMITS		HG00033B
	AIR OPERATING PERMITS	PERMIT	1426
	AIR OPERATING PERMITS	PERMIT	2174
	AIR OPERATING PERMITS	PERMIT	2175
	AIR OPERATING PERMITS	PERMIT	2176
	AIR OPERATING PERMITS	PERMIT	2177
	AIR OPERATING PERMITS	PERMIT	2178
	AIR OPERATING PERMITS	PERMIT	2179
	AIR OPERATING PERMITS	PERMIT	2180
	AIR OPERATING PERMITS	PERMIT	2181
	AIR OPERATING PERMITS	PERMIT	2182
	AIR OPERATING PERMITS	PERMIT	2183
	AIR OPERATING PERMITS	PERMIT	2184
	AIR OPERATING PERMITS	PERMIT	2185
	WASTEWATER	PERMIT	WQ0000391000
	WASTEWATER	PERMIT	TPDES0003531
	WASTEWATER	PERMIT	TX0003531
	AIR NEW SOURCE PERMITS	PERMIT	1768
	AIR NEW SOURCE PERMITS	PERMIT	2128
	AIR NEW SOURCE PERMITS	PERMIT	2933
	AIR NEW SOURCE PERMITS	PERMIT	2936
	AIR NEW SOURCE PERMITS	PERMIT	3130A
	AIR NEW SOURCE PERMITS	PERMIT	3294
	AIR NEW SOURCE PERMITS	PERMIT	3627
	AIR NEW SOURCE PERMITS	PERMIT	6245
	AIR NEW SOURCE PERMITS	PERMIT	6387
	AIR NEW SOURCE PERMITS	PERMIT	8125
	AIR NEW SOURCE PERMITS	PERMIT	10586
	AIR NEW SOURCE PERMITS	PERMIT	10700
	AIR NEW SOURCE PERMITS	PERMIT	10812
	AIR NEW SOURCE PERMITS	PERMIT	11735
	AIR NEW SOURCE PERMITS	PERMIT	12334
	AIR NEW SOURCE PERMITS	PERMIT	13849
	AIR NEW SOURCE PERMITS	PERMIT	15348
	AIR NEW SOURCE PERMITS	PERMIT	12341
	AIR NEW SOURCE PERMITS	PERMIT	22779
	AIR NEW SOURCE PERMITS	PERMIT	23079
	AIR NEW SOURCE PERMITS	PERMIT	24677
	AIR NEW SOURCE PERMITS	PERMIT	24887
	AIR NEW SOURCE PERMITS	PERMIT	30868
	AIR NEW SOURCE PERMITS	PERMIT	32324
	AIR NEW SOURCE PERMITS	PERMIT	32136
	AIR NEW SOURCE PERMITS	PERMIT	32629
	AIR NEW SOURCE PERMITS	PERMIT	33899
	AIR NEW SOURCE PERMITS	PERMIT	34897
	AIR NEW SOURCE PERMITS	PERMIT	42948
	AIR NEW SOURCE PERMITS	PERMIT	47487

AIR NEW SOURCE PERMITS	PERMIT	50141
AIR NEW SOURCE PERMITS	PERMIT	50142
AIR NEW SOURCE PERMITS	PERMIT	50165
AIR NEW SOURCE PERMITS	ACCOUNT NUMBER	HG0033B
AIR NEW SOURCE PERMITS	PERMIT	52720
AIR NEW SOURCE PERMITS	PERMIT	54098
AIR NEW SOURCE PERMITS	REGISTRATION	88680
AIR NEW SOURCE PERMITS	REGISTRATION	76017
AIR NEW SOURCE PERMITS	REGISTRATION	75881
AIR NEW SOURCE PERMITS	REGISTRATION	76313
AIR NEW SOURCE PERMITS	REGISTRATION	76277
AIR NEW SOURCE PERMITS	AFS NUM	4820100075
AIR NEW SOURCE PERMITS	PERMIT	49120
AIR NEW SOURCE PERMITS	PERMIT	49130
AIR NEW SOURCE PERMITS	REGISTRATION	74110
AIR NEW SOURCE PERMITS	REGISTRATION	73859
AIR NEW SOURCE PERMITS	REGISTRATION	72948
AIR NEW SOURCE PERMITS	REGISTRATION	72946
AIR NEW SOURCE PERMITS	REGISTRATION	74051
AIR NEW SOURCE PERMITS	REGISTRATION	74563
AIR NEW SOURCE PERMITS	REGISTRATION	74181
AIR NEW SOURCE PERMITS	REGISTRATION	74944
AIR NEW SOURCE PERMITS	REGISTRATION	74949
AIR NEW SOURCE PERMITS	REGISTRATION	75322
AIR NEW SOURCE PERMITS	REGISTRATION	76778
AIR NEW SOURCE PERMITS	REGISTRATION	76791
AIR NEW SOURCE PERMITS	REGISTRATION	76651
AIR NEW SOURCE PERMITS	REGISTRATION	77318
AIR NEW SOURCE PERMITS	REGISTRATION	77619
AIR NEW SOURCE PERMITS	REGISTRATION	77640
AIR NEW SOURCE PERMITS	REGISTRATION	76693
AIR NEW SOURCE PERMITS	REGISTRATION	78024
AIR NEW SOURCE PERMITS	REGISTRATION	78069
AIR NEW SOURCE PERMITS	REGISTRATION	78128
AIR NEW SOURCE PERMITS	REGISTRATION	78108
AIR NEW SOURCE PERMITS	REGISTRATION	77631
AIR NEW SOURCE PERMITS	REGISTRATION	78278
AIR NEW SOURCE PERMITS	REGISTRATION	78343
AIR NEW SOURCE PERMITS	REGISTRATION	78191
AIR NEW SOURCE PERMITS	REGISTRATION	78252
AIR NEW SOURCE PERMITS	REGISTRATION	78560
AIR NEW SOURCE PERMITS	REGISTRATION	78173
AIR NEW SOURCE PERMITS	REGISTRATION	78197
AIR NEW SOURCE PERMITS	REGISTRATION	78772
AIR NEW SOURCE PERMITS	REGISTRATION	78381
AIR NEW SOURCE PERMITS	REGISTRATION	78819
AIR NEW SOURCE PERMITS	REGISTRATION	79261
AIR NEW SOURCE PERMITS	REGISTRATION	79431
AIR NEW SOURCE PERMITS	REGISTRATION	79460
AIR NEW SOURCE PERMITS	REGISTRATION	78599
AIR NEW SOURCE PERMITS	REGISTRATION	78978
AIR NEW SOURCE PERMITS	REGISTRATION	80296
AIR NEW SOURCE PERMITS	REGISTRATION	80137
AIR NEW SOURCE PERMITS	REGISTRATION	80914

AIR NEW SOURCE PERMITS	REGISTRATION	80689
AIR NEW SOURCE PERMITS	REGISTRATION	80597
AIR NEW SOURCE PERMITS	REGISTRATION	81543
AIR NEW SOURCE PERMITS	REGISTRATION	81190
AIR NEW SOURCE PERMITS	REGISTRATION	81189
AIR NEW SOURCE PERMITS	REGISTRATION	81759
AIR NEW SOURCE PERMITS	REGISTRATION	81636
AIR NEW SOURCE PERMITS	REGISTRATION	81630
AIR NEW SOURCE PERMITS	REGISTRATION	82226
AIR NEW SOURCE PERMITS	REGISTRATION	81716
AIR NEW SOURCE PERMITS	REGISTRATION	81930
AIR NEW SOURCE PERMITS	REGISTRATION	82538
AIR NEW SOURCE PERMITS	REGISTRATION	85128
AIR NEW SOURCE PERMITS	REGISTRATION	84818
AIR NEW SOURCE PERMITS	REGISTRATION	90128
AIR NEW SOURCE PERMITS	REGISTRATION	85442
AIR NEW SOURCE PERMITS	REGISTRATION	90882
AIR NEW SOURCE PERMITS	REGISTRATION	87006
AIR NEW SOURCE PERMITS	REGISTRATION	85303
AIR NEW SOURCE PERMITS	REGISTRATION	84079
AIR NEW SOURCE PERMITS	REGISTRATION	84091
AIR NEW SOURCE PERMITS	PERMIT	83799
AIR NEW SOURCE PERMITS	REGISTRATION	84183
AIR NEW SOURCE PERMITS	REGISTRATION	84715
AIR NEW SOURCE PERMITS	REGISTRATION	84149
AIR NEW SOURCE PERMITS	REGISTRATION	84502
AIR NEW SOURCE PERMITS	REGISTRATION	84076
AIR NEW SOURCE PERMITS	REGISTRATION	84651
AIR NEW SOURCE PERMITS	REGISTRATION	84381
AIR NEW SOURCE PERMITS	REGISTRATION	85308
AIR NEW SOURCE PERMITS	REGISTRATION	84541
AIR NEW SOURCE PERMITS	REGISTRATION	88142
AIR NEW SOURCE PERMITS	REGISTRATION	90148
INDUSTRIAL AND HAZARDOUS WASTE GENERATION	EPA ID	TXD058275769
INDUSTRIAL AND HAZARDOUS WASTE GENERATION	SOLID WASTE REGISTRATION # (SWR)	30030
INDUSTRIAL AND HAZARDOUS WASTE STORAGE	PERMIT	50117
INDUSTRIAL AND HAZARDOUS WASTE STORAGE	PERMIT	50117
UNDERGROUND INJECTION CONTROL	PERMIT	WDW036
PUBLIC WATER SYSTEM/SUPPLY	REGISTRATION	1011578
WATER LICENSING	LICENSE	1011578
IHW CORRECTIVE ACTION	SOLID WASTE REGISTRATION # (SWR)	30030
AIR EMISSIONS INVENTORY	ACCOUNT NUMBER	HG0033B

Location: 8280 SHELDON RD, CHANNELVIEW, TX, 77530

TCEQ Region: REGION 12 - HOUSTON

Date Compliance History Prepared: September 30, 2009

Agency Decision Requiring Compliance History: Enforcement

Compliance Period: September 30, 2004 to September 30, 2009

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

Name: John Muennink Phone: (361) 825-3423

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/operator of the site during the compliance period? No
3. If Yes, who is the current owner/operator? N/A
4. If Yes, who was/were the prior owner(s)/operator(s) ? N/A
5. When did the change(s) in owner or operator occur? N/A
6. Rating Date: 9/1/2009 Repeat Violator: NO

Components (Multimedia) for the Site :

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

Effective Date: 12/02/2006 ADMINORDER 2006-0515-AIR-E

Classification: Moderate
Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
Rqmt Prov: S.C. 1 PERMIT
Description: Failure to prevent the release of unauthorized emissions from an aboveground storage tank pressure safety valve.

Effective Date: 05/22/2008 ADMINORDER 2007-1230-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: Permit # 2128 SC 1 PA
Description: As evidenced by Findings of Fact No. 3, Equistar failed to prevent unauthorized emissions during an April 4, 2007 emissions event, in violation of Air Permit No. 2128, Special Condition No. 1, 30 TEX. ADMIN. CODE § 116.115(c), and TEX. HEALTH & SAFETY CODE § 382.085(b). Since these emissions were avoidable, the demonstrations in 30 TEX. ADMIN. CODE § 101.222 necessary to present an affirmative defense were not met.
Classification: Moderate

Citation: 30 TAC Chapter 115, SubChapter H 115.722(c)(1)
30 TAC Chapter 116, SubChapter B 116.115(c)
5C THC Chapter 382, SubChapter D 382.085(b)
Rqmt Prov: TCEQ Air Permit #2933, SC#1 PA
Description: As evidenced by Findings of Fact No. 4, Equistar failed to prevent unauthorized emissions during a January 8, 2007 emissions event, in violation of Air Permit No. 2933, Special Condition No. 1, 30 TEX. ADMIN. CODE §§ 115.722(c)(1) and 116.115(c), and TEX. HEALTH & SAFETY CODE § 382.085(b). Since these emissions were unauthorized, the demonstrations in 30 TEX. ADMIN. CODE § 101.222 necessary to present an affirmative defense were not met.

Effective Date: 06/19/2008 ADMINORDER 2007-0493-AIR-E

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: FOP O-02177 SC 10 OP
FOP O-02177 SC 1A OP
NSR 22779 SC 8(E) PA
Description: Failed to cap 4 open-ended lines.
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: FOP O-02177 SC 10 OP
FOP O-02177 SC 1A OP
NSR 22779 SC 6(A) PA

Description: Failed to operate flare within required heat input of 300 Btu/scf.
Classification: Minor
Citation: 30 TAC Chapter 115, SubChapter H 115.726(d)(3)
30 TAC Chapter 122, SubChapter B 122.143(4)
5C THC Chapter 382, SubChapter D 382.085(b)

Rqmt Prov: FOP O-02177 SC 1.J(ii) OP

Description: Failed to report corrective actions within the required time frame.
Classification: Moderate
Citation: 30 TAC Chapter 115, SubChapter H 115.725(d)(2)
30 TAC Chapter 122, SubChapter B 122.143(4)
5C THC Chapter 382, SubChapter D 382.085(b)

Rqmt Prov: FOP O-01277 SC 1.J(ii) OP

Description: Failed to calibrate the Poly Butadiene unit flare analyzer.
Classification: Minor
Citation: 30 TAC Chapter 122, SubChapter B 122.121
5C THC Chapter 382, SubChapter D 382.085(b)
5C THSC Chapter 382 382.054

Description: Failed to obtain authorization for emissions sources and their associated emissions prior to operation.
Classification: Moderate
Citation: 30 TAC Chapter 116, SubChapter B 116.115(b)(2)(F)
30 TAC Chapter 122, SubChapter B 122.143(4)
5C THC Chapter 382, SubChapter D 382.085(b)

Rqmt Prov: FOP O-02177 SC 10 OP
NSR 49120 SC 1 PA

Description: Failed to comply with permitted emissions limits.
Classification: Moderate
Citation: 30 TAC Chapter 115, SubChapter B 115.136(a)(1)
30 TAC Chapter 122, SubChapter B 122.143(4)
5C THC Chapter 382, SubChapter D 382.085(b)

Rqmt Prov: FOP O-02177 SC 1A OP

Description: Failed to maintain sufficient records to demonstrate continuous compliance with VOC water separator exemption criteria.
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: FOP O-02177 SC 10 OP
FOP O-02177 SC 1A OP
NSR 22779 SC 8(l) PA

Description: The Respondent failed to repair a leaking valve during a scheduled shutdown.
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 63.127(b)(2)
5C THC Chapter 382, SubChapter D 382.085(b)

Rqmt Prov: FOP O-02181 SC 1A OP

Description: Failed to use a continuous monitoring recorder on the Methanol Skid (ECULR2MEOH).
Classification: Moderate
Citation: 30 TAC Chapter 115, SubChapter C 115.244
30 TAC Chapter 122, SubChapter B 122.143(4)
5C THC Chapter 382, SubChapter D 382.085(b)

Rqmt Prov: FOP O-02181 SC 6C(iv) OP

Description: Failed to perform daily inspections of the fuel dispensing facilities.
Classification: Moderate
Citation: 30 TAC Chapter 115, SubChapter C 115.212(a)(3)(A)(ii)
30 TAC Chapter 122, SubChapter B 122.143(4)
5C THC Chapter 382, SubChapter D 382.085(b)

Rqmt Prov: FOP O-02181 SC 6B(ii) OP
FOP O-02181 SC 1A OP

Description: Failed to provide proper emissions control for waste material.

Classification: Moderate

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

Rqmt Prov: FOP O-02181 SC 7A OP
FOP O-02181 SC1A OP

Description: Failed to comply with restrictions on engine operating hours in an ozone nonattainment area.

Classification: Minor

Citation: 30 TAC Chapter 117, SubChapter B 117.219(f)(10)
30 TAC Chapter 122, SubChapter B 122.143(4)
5C THC Chapter 382, SubChapter D 382.085(b)

Rqmt Prov: FOP O-02181 SC 1A OP
FOP O-02181 SC 7E OP

Description: Failure to record the start and stop times of diesel pump.

Classification: Moderate

Citation: 30 TAC Chapter 115, SubChapter B 115.144(4)(A)
5C THC Chapter 382, SubChapter D 382.085(b)

Rqmt Prov: FOP O-02181 SC 1A OP

Description: Failed to demonstrate VOC reduction efficiency for the ECUABEAST bio-treatment unit.

Classification: Moderate

Citation: 30 TAC Chapter 115, SubChapter H 115.725(d)(1)
5C THC Chapter 382, SubChapter D 382.085(b)

Description: Failed to timely conduct flare analyzer calibrations.

Classification: Moderate

Citation: 30 TAC Chapter 101, SubChapter A 101.20(2)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT A 63.10(d)(5)(I)
5C THC Chapter 382, SubChapter D 382.085(b)

Description: Failed to comply with the requirements of malfunction reporting for the wastewater steam stripper (EUTT8802).

Classification: Moderate

Citation: 30 TAC Chapter 101, SubChapter A 101.20(1)
30 TAC Chapter 101, SubChapter A 101.20(2)
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 63, SubChapter C, PT 63, SubPT H 63.167(a)(1)
5C THC Chapter 382, SubChapter D 382.085(b)

Rqmt Prov: FOP O-02181 SC 1A OP
FOP O-02181 SC 22 OP
NSR 2128 SC 8(E) PA

Description: Failed to equip open ended lines with a cap, blind flange, plug, or a second valve.

Classification: Minor

Citation: 30 TAC Chapter 122, SubChapter B 122.132(a)
5C THC Chapter 382, SubChapter D 382.085(b)

Rqmt Prov: General Terms and Conditions OP

Description: Failed to include PBR claims in a FOP.

Classification: Moderate

Citation: 30 TAC Chapter 115, SubChapter B 115.112(a)(3)
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: FOP O-02178 SC 10 OP
FOP O-02178 SC 1A OP
NSR 24677 SC 1 PA

Description: Exceeded permitted emissions limits from tank TK-2810.

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: FOP O-02178 SC 10 OP
NSR 24677 SC 11F PA

NSR 24677 SC 13 PA

Description: Failed to install rupture disc and pressure gauges on three safety relief valves (EPM F28E00) in the Styrene Maleic Anhydride unit.

Classification: Moderate

Citation: 30 TAC Chapter 116, SubChapter B 116.116(b)(1)
30 TAC Chapter 122, SubChapter B 122.143(4)
5C THC Chapter 382, SubChapter D 382.085(b)

Rqmt Prov: STC 10 OP

Description: Failed to accurately represent operating temperatures for tote EPN 28E37 in the permit representations.

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: FOP -02178 SC 10 OP
NSR 24677 SC 9C PA

Description: Failed to perform closed loop cumene sampling.

Classification: Minor

Citation: 30 TAC Chapter 117, SubChapter B 117.213(a)
30 TAC Chapter 122, SubChapter B 122.143(4)
5C THC Chapter 382, SubChapter D 382.085(b)

Rqmt Prov: FOP O-02178 SC 1A OP

Description: Failed to maintain continuous records of fuel flow for Heater MSMHT2801B.

Classification: Minor

Citation: 30 TAC Chapter 111, SubChapter A 111.111(a)(1)(B)
30 TAC Chapter 122, SubChapter B 122.143(4)
5C THC Chapter 382, SubChapter D 382.085(b)

Rqmt Prov: FOP O-02178 SC 3 OP

Description: Failed to prevent visible emissions from Dust Collector EPN28E29.

Effective Date: 10/01/2008

COURTORDER

Classification: Moderate

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

Description: Failure to control emissions from cooling towers OP1, OP2, and East Plant under MAERT limits.

Classification: Moderate

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

Description: Failure to properly define for cooling towers OP1 and OP2, VOC in the exhaust air from the air stripping system (either ppmv or lb/VOC/gal) at which a leak into cooling water will be assumed.

Classification: Moderate

Citation: 30 TAC Chapter 101, SubChapter A 101.6(a)(1)(A)

Description: Failure to report upset emissions of benzene from cooling towers.

Classification: Major

Citation: 30 TAC Chapter 335, SubChapter A 335.2
30 TAC Chapter 335, SubChapter B 335.43

Description: Unauthorized discharges into the East basin were noted

Classification: Moderate

Citation: 5C THC Chapter 382, SubChapter A 382.085(a)

Description: Failed to prevent unauthorized emissions of 4,380 pounds (lbs) of unspecified volatile organic compounds (VOCs), 1,511 lbs of butadiene, and 1,095 lbs of butene during an emissions event on September 1, 2003 that lasted three minutes.

Classification: Major

Citation: 30 TAC Chapter 101, SubChapter F 101.201(b)(7)
5C THC Chapter 382, SubChapter A 382.085(b)

Description: Failed to report all individually listed compounds or mixtures of air contaminants in an emissions event notification. Specifically, VOCs were not specified.

Classification: Moderate

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

Description: Failed to prevent the unauthorized release of 173 pounds (lbs) of volatile organic compounds (VOCs), including 30 lbs of Highly Reactive VOCs from the Condensate Pot (D-3655) during an emissions event that began on April 21, 2004 and lasted for 170 hours and 45 minutes.

Classification: Moderate

Citation: 30 TAC Chapter 101, SubChapter F 101.201(a)(2)(D)
5C THC Chapter 382, SubChapter A 382.085(b)

Description: Failed to properly notify the TCEQ of an emissions event that began on July 14, 2004. Specifically, Equistar failed to identify the common name of the facility which incurred the emissions event in the Initial Notification.

Classification: Moderate

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

Rqmt Prov: General Condition No. 8 PERMIT

Description: Failed to comply with permitted emission limits during an emissions event that began on July 14, 2004 and lasted for three hours and 30 minutes.

Classification: Moderate

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

Description: Failed to prevent the unauthorized release of 6,100 pounds of propylene from the Propylene Product Drum (D-4687) during an emissions event that began on June 23, 2004 and lasted for two hours.

Classification: Moderate

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

Description: Failed to prevent the unauthorized release of 340 lbs of propylene and 17 lbs of propane from a pressure relief valve in Exchanger E-36232 during an emissions event that began on July 14, 2004 and lasted for 3,057 hours.

Classification: Moderate

Citation: 30 TAC Chapter 101, SubChapter F 101.201(a)(2)(G)
30 TAC Chapter 101, SubChapter F 101.201(b)(7)
5C THC Chapter 382, SubChapter A 382.085(b)

Description: Failed to properly notify the TCEQ of an emissions event that began on July 22, 2004. Specifically, Equistar failed to speculate VOCs in the Initial Notification and Final Report.

Classification: Moderate

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

Rqmt Prov: Permit No. 1768, General Condition No. 8 PERMIT
Permit No. 2936, Special Condition No. 1 PERMIT

Description: Failed to comply with permitted emission limits during an emissions event that began on July 22, 2004 and lasted for 200 hours.

Classification: Moderate

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

Rqmt Prov: TCEQ Air Permit No. 2128, GC No. 8 PERMIT

Description: Failed to prevent a unauthorized emissions of 990 pounds ("lbs") of 1,3 butadiene during an avoidable emissions event that occurred on November 23, 2004 and lasted three minutes.

Classification: Moderate

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

Rqmt Prov: TCEQ Permit #1768, GC #8 PERMIT

Description: Failed to prevent unauthorized emissions of 119.35 pounds (lbs) of benzene and 154.69 lbs of volatile organic compounds during an emissions event that occurred on April 1, 2005 and lasted 200 hours and 30 minutes.

Classification: Moderate

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

Rqmt Prov: TCEQ Permit #6387, GC #8 PERMIT

Description: Failed to prevent unauthorized emissions of 25 pounds (lbs) of 1,3-butadiene, 603 lbs of N-butane, 1,756 lbs of butene, 155 lbs of isobutane, and 7 lbs of propylene during an emissions event that occurred on May 24, 2005 and lasted 2 hours. These emissions are not permitted. Since this emissions event was avoidable

Classification: Moderate

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

Rqmt Prov: TCEQ Air Permit No. 24887, GC #8 PERMIT

Description: Failed to prevent a unauthorized emissions of 1,532 lbs of propylene and 10 lbs of isobutane during an avoidable emissions event that occurred on July 1, 2004 and lasted 4 hours and 54 minutes.

Classification: Moderate

Citation: 30 TAC Chapter 101, SubChapter A 101.20(2)
30 TAC Chapter 113, SubChapter C 113.130
30 TAC Chapter 116, SubChapter B 116.115(c)
40 CFR Chapter 61, SubChapter C, PT 61, SubPT V 61.242-6(a)(2)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.167(a)(2)
5C THC Chapter 382, SubChapter A 382.085(b)

Rqmt Prov: Special Condition 2 PERMIT

Description: Failed to properly seal the end of a lines containing volatile organic compounds ("VOCs") and hazardous air pollutants ("HAPs"). Specifically, VOC and HAP concentrations detected from 10 plugs in the Methyl Tertiary Butyl Ether ("MTBE") and Butadiene ("C4 Recovery") units.

Classification: Moderate

Citation: 30 TAC Chapter 101, SubChapter A 101.20(2)
30 TAC Chapter 113, SubChapter C 113.130
30 TAC Chapter 115, SubChapter D 115.352(4)
30 TAC Chapter 116, SubChapter B 116.115(c)
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: Special Condition 10E PERMIT
Special Condition 1E PERMIT
Special Condition 2C PERMIT

Description: Failed to equip each open-ended line or valve with a cap, blind flange, plug, or second valve. Specifically, two valves in the East Tank Farm, one line in the Alkylation Unit, and one line in the C4 Recovery Unit were not equipped with a cap, blind flange, plug, or second valve.

Classification: Moderate

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

Rqmt Prov: 2128, SC No.7A PERMIT

Description: Failed to perform monthly monitoring of the East Plant Cooling Tower, Emission Point Number ("EPN") 24E04. Specifically, streams from six headers returning water to the cooling tower to a single monitoring point were combined prior to monitoring, but required to monitor the six headers individually.

Classification: Moderate

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

Rqmt Prov: 2128, SC No. 7B PERMIT

Description: Failed to maintain an emission rate below the allowable emission limit for EPN 24E04. Specifically, a canister sample was taken at Header Number 2 and results revealed emissions were 6.16 lbs per hour ("lbs/hr"), but the permitted limit is 3.23 lbs/hr.

Classification: Moderate

Citation: 30 TAC Chapter 116, SubChapter B 116.116(a)(1)

Description: Failed to represent the product and process information properly in the renewal application dated August 2004 for Permit No. 24887. Specifically, alkylates were not separated into C5s, C6s, C8s, C9s, and C10s. The alkylates contain 3 to 6% of isopentane and more than 1,102 tons per year is being produced.

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	10/25/2004	(351831)
2	10/25/2004	(351833)
3	11/01/2004	(285942)
4	11/03/2004	(334297)
5	11/05/2004	(334308)
6	11/05/2004	(334310)
7	11/05/2004	(334314)
8	11/11/2004	(292333)
9	11/11/2004	(292452)
10	11/14/2004	(275792)

11 11/22/2004 (293289)
12 11/22/2004 (339105)
13 11/22/2004 (339107)
14 11/23/2004 (334387)
15 11/23/2004 (334429)
16 11/23/2004 (351832)
17 11/29/2004 (274800)
18 12/06/2004 (275639)
19 12/06/2004 (341908)
20 12/09/2004 (343543)
21 12/14/2004 (339112)
22 12/15/2004 (339111)
23 12/27/2004 (276826)
24 12/27/2004 (381708)
25 12/28/2004 (343601)
26 01/03/2005 (286756)
27 01/03/2005 (339113)
28 01/04/2005 (339104)
29 01/05/2005 (339108)
30 01/07/2005 (339103)
31 01/10/2005 (343232)
32 01/12/2005 (346553)
33 01/18/2005 (336265)
34 02/10/2005 (337111)
35 02/10/2005 (349111)
36 02/10/2005 (349267)
37 02/10/2005 (349316)
38 02/10/2005 (349636)
39 02/11/2005 (336418)
40 02/11/2005 (336433)
41 02/11/2005 (336438)
42 02/17/2005 (343594)
43 02/23/2005 (381706)
44 02/25/2005 (345588)
45 03/03/2005 (339106)
46 03/22/2005 (381707)
47 03/28/2005 (375212)
48 03/28/2005 (375220)
49 03/28/2005 (375234)
50 03/31/2005 (373125)
51 04/06/2005 (375076)
52 04/18/2005 (375016)
53 04/20/2005 (372583)
54 04/20/2005 (376147)
55 04/22/2005 (346277)
56 04/25/2005 (377509)
57 05/03/2005 (419501)
58 05/24/2005 (419502)
59 06/14/2005 (393497)
60 06/21/2005 (419503)
61 06/22/2005 (381407)
62 06/22/2005 (392621)
63 06/23/2005 (378454)
64 06/23/2005 (378466)
65 07/15/2005 (395098)
66 07/18/2005 (392902)
67 07/22/2005 (381313)
68 07/22/2005 (392487)
69 07/22/2005 (392651)

70	07/22/2005	(394428)
71	07/25/2005	(440656)
72	07/26/2005	(399215)
73	08/05/2005	(381400)
74	08/05/2005	(392610)
75	08/05/2005	(393207)
76	08/11/2005	(404321)
77	08/11/2005	(404342)
78	08/11/2005	(404367)
79	08/11/2005	(404370)
80	08/12/2005	(399221)
81	08/15/2005	(404957)
82	08/23/2005	(440657)
83	08/24/2005	(406415)
84	08/26/2005	(372787)
85	08/29/2005	(406161)
86	09/13/2005	(431694)
87	10/24/2005	(440658)
88	10/26/2005	(440659)
89	11/15/2005	(434603)
90	11/18/2005	(437299)
91	11/22/2005	(468155)
92	11/28/2005	(468154)
93	12/01/2005	(435325)
94	12/08/2005	(434728)
95	12/19/2005	(438915)
96	12/21/2005	(468156)
97	02/15/2006	(455481)
98	02/22/2006	(450109)
99	02/24/2006	(451477)
100	02/27/2006	(468153)
101	02/28/2006	(451452)
102	02/28/2006	(451480)
103	02/28/2006	(451483)
104	02/28/2006	(451494)
105	02/28/2006	(451788)
106	03/13/2006	(454890)
107	03/23/2006	(498017)
108	03/24/2006	(457373)
109	03/28/2006	(453139)
110	03/29/2006	(459500)
111	03/31/2006	(455940)
112	04/24/2006	(498018)
113	04/28/2006	(462755)
114	05/16/2006	(463873)
115	05/23/2006	(466508)
116	05/23/2006	(498019)
117	05/24/2006	(465260)
118	05/31/2006	(480405)
119	05/31/2006	(480422)
120	05/31/2006	(480427)
121	05/31/2006	(480433)
122	05/31/2006	(480441)
123	05/31/2006	(480444)
124	06/21/2006	(498020)
125	06/26/2006	(464019)
126	06/30/2006	(483427)
127	07/07/2006	(484895)
128	07/17/2006	(460500)

129 07/17/2006 (464564)
130 07/19/2006 (480415)
131 07/20/2006 (486401)
132 07/24/2006 (520033)
133 07/28/2006 (484749)
134 08/04/2006 (339110)
135 08/15/2006 (481194)
136 08/15/2006 (482128)
137 08/15/2006 (489890)
138 08/16/2006 (457265)
139 08/21/2006 (520034)
140 09/01/2006 (510768)
141 09/05/2006 (486742)
142 09/25/2006 (520035)
143 10/04/2006 (488324)
144 10/24/2006 (544282)
145 11/21/2006 (516667)
146 11/27/2006 (544283)
147 11/30/2006 (531615)
148 12/11/2006 (519152)
149 12/19/2006 (544284)
150 12/29/2006 (535494)
151 01/23/2007 (544285)
152 01/30/2007 (538091)
153 01/31/2007 (517108)
154 01/31/2007 (537091)
155 01/31/2007 (537099)
156 01/31/2007 (537102)
157 02/08/2007 (538420)
158 02/22/2007 (485046)
159 02/22/2007 (574936)
160 02/27/2007 (532597)
161 03/12/2007 (532595)
162 03/23/2007 (574937)
163 04/05/2007 (532607)
164 04/10/2007 (532608)
165 04/12/2007 (541831)
166 04/12/2007 (554839)
167 04/18/2007 (593172)
168 04/23/2007 (539454)
169 04/23/2007 (574938)
170 05/23/2007 (574939)
171 06/25/2007 (574940)
172 06/27/2007 (560042)
173 07/18/2007 (556815)
174 07/18/2007 (566602)
175 07/24/2007 (567353)
176 07/28/2007 (574941)
177 07/30/2007 (543338)
178 08/03/2007 (543345)
179 08/06/2007 (568530)
180 08/06/2007 (568542)
181 08/06/2007 (607498)
182 08/09/2007 (562982)
183 08/09/2007 (563012)
184 08/10/2007 (562990)
185 08/10/2007 (563023)
186 08/10/2007 (564946)
187 08/20/2007 (564294)

188	08/20/2007	(564331)
189	08/20/2007	(564360)
190	08/22/2007	(607499)
191	08/23/2007	(571675)
192	08/24/2007	(543303)
193	08/24/2007	(543306)
194	09/24/2007	(607500)
195	09/28/2007	(563816)
196	09/28/2007	(564856)
197	09/28/2007	(564932)
198	09/28/2007	(566320)
199	10/04/2007	(565773)
200	10/10/2007	(565969)
201	10/10/2007	(566558)
202	10/10/2007	(566616)
203	10/12/2007	(571938)
204	10/12/2007	(572220)
205	10/12/2007	(572252)
206	10/12/2007	(572267)
207	10/12/2007	(572362)
208	10/12/2007	(572404)
209	10/15/2007	(572176)
210	10/16/2007	(593759)
211	10/23/2007	(619405)
212	11/19/2007	(594272)
213	11/19/2007	(619406)
214	11/26/2007	(570252)
215	11/26/2007	(570313)
216	11/26/2007	(570316)
217	11/26/2007	(570346)
218	11/26/2007	(570400)
219	11/28/2007	(596225)
220	12/07/2007	(568047)
221	12/07/2007	(568066)
222	12/07/2007	(568076)
223	12/07/2007	(568153)
224	12/07/2007	(568347)
225	12/07/2007	(568368)
226	12/17/2007	(608808)
227	12/27/2007	(619407)
228	01/02/2008	(595848)
229	01/02/2008	(599541)
230	01/03/2008	(599518)
231	01/03/2008	(599950)
232	01/08/2008	(600740)
233	01/10/2008	(600765)
234	01/10/2008	(613652)
235	01/22/2008	(671912)
236	01/23/2008	(614499)
237	01/25/2008	(615980)
238	01/28/2008	(615871)
239	01/28/2008	(616242)
240	01/29/2008	(610831)
241	02/15/2008	(615597)
242	02/25/2008	(671910)
243	03/06/2008	(596061)
244	03/06/2008	(610691)
245	03/19/2008	(616201)
246	03/19/2008	(616236)

247	03/19/2008	(616259)
248	03/20/2008	(671911)
249	03/26/2008	(637649)
250	03/27/2008	(611770)
251	04/04/2008	(610663)
252	04/10/2008	(616840)
253	04/22/2008	(689830)
254	04/24/2008	(637133)
255	04/29/2008	(641446)
256	05/02/2008	(610690)
257	05/06/2008	(638391)
258	05/06/2008	(638445)
259	05/06/2008	(638471)
260	05/08/2008	(638556)
261	05/16/2008	(639245)
262	05/16/2008	(639472)
263	05/22/2008	(689831)
264	05/23/2008	(639094)
265	06/06/2008	(682324)
266	06/16/2008	(610615)
267	06/17/2008	(636281)
268	06/24/2008	(689832)
269	07/03/2008	(636094)
270	07/03/2008	(681436)
271	07/07/2008	(654572)
272	07/09/2008	(683399)
273	07/10/2008	(685750)
274	07/18/2008	(681438)
275	07/22/2008	(710592)
276	07/30/2008	(687221)
277	08/01/2008	(681437)
278	08/11/2008	(610620)
279	08/11/2008	(637040)
280	08/13/2008	(682388)
281	08/15/2008	(689619)
282	08/25/2008	(710593)
283	08/27/2008	(638212)
284	08/29/2008	(681367)
285	09/08/2008	(681362)
286	10/13/2008	(704398)
287	10/15/2008	(686481)
288	10/15/2008	(686491)
289	10/17/2008	(679974)
290	10/17/2008	(680354)
291	10/22/2008	(682983)
292	10/22/2008	(727384)
293	10/23/2008	(680427)
294	10/23/2008	(681178)
295	10/27/2008	(687534)
296	10/28/2008	(685998)
297	10/29/2008	(686367)
298	10/29/2008	(686377)
299	10/29/2008	(686382)
300	10/29/2008	(687350)
301	10/29/2008	(705305)
302	10/31/2008	(686446)
303	11/07/2008	(704030)
304	11/20/2008	(704732)
305	11/20/2008	(704907)

306	11/21/2008	(706552)
307	11/24/2008	(654539)
308	11/24/2008	(727385)
309	11/25/2008	(707993)
310	12/04/2008	(700744)
311	12/04/2008	(702100)
312	12/05/2008	(654812)
313	12/05/2008	(654846)
314	12/05/2008	(654874)
315	12/05/2008	(707275)
316	12/11/2008	(683007)
317	12/15/2008	(686398)
318	12/15/2008	(686403)
319	12/15/2008	(686411)
320	12/15/2008	(686444)
321	12/15/2008	(686496)
322	12/15/2008	(686500)
323	12/15/2008	(686508)
324	12/16/2008	(710038)
325	12/17/2008	(685609)
326	12/17/2008	(710007)
327	12/22/2008	(727386)
328	01/09/2009	(721591)
329	01/16/2009	(709781)
330	01/16/2009	(721214)
331	01/22/2009	(750128)
332	02/03/2009	(722705)
333	02/10/2009	(726755)
334	02/12/2009	(683026)
335	02/13/2009	(657092)
336	02/16/2009	(724818)
337	02/16/2009	(725983)
338	02/16/2009	(726007)
339	02/16/2009	(726040)
340	02/16/2009	(726571)
341	02/16/2009	(726949)
342	02/17/2009	(726783)
343	02/24/2009	(750125)
344	02/26/2009	(725940)
345	03/23/2009	(750126)
346	03/31/2009	(735618)
347	04/06/2009	(738472)
348	04/09/2009	(738272)
349	04/13/2009	(738348)
350	04/13/2009	(738352)
351	04/13/2009	(738805)
352	04/17/2009	(740559)
353	04/22/2009	(736328)
354	04/22/2009	(768262)
355	04/28/2009	(737713)
356	04/30/2009	(740883)
357	05/01/2009	(707130)
358	05/04/2009	(738986)
359	05/04/2009	(741949)
360	05/04/2009	(741983)
361	05/04/2009	(741994)
362	05/14/2009	(742317)
363	05/14/2009	(742327)
364	05/15/2009	(742125)

365	05/15/2009	(742826)
366	05/22/2009	(768263)
367	05/26/2009	(705763)
368	06/17/2009	(749322)
369	06/18/2009	(749474)
370	06/24/2009	(741317)
371	06/24/2009	(744476)
372	06/24/2009	(744489)
373	06/24/2009	(748352)
374	06/29/2009	(741269)
375	06/29/2009	(744624)
376	07/02/2009	(744588)
377	07/02/2009	(745599)
378	07/02/2009	(745661)
379	07/02/2009	(745805)
380	07/03/2009	(747361)
381	07/06/2009	(745792)
382	07/07/2009	(744818)
383	07/08/2009	(745749)
384	07/08/2009	(745772)
385	07/08/2009	(745783)
386	07/09/2009	(701940)
387	07/14/2009	(746327)
388	07/14/2009	(746862)
389	07/15/2009	(746896)
390	07/15/2009	(747036)
391	07/15/2009	(748537)
392	07/16/2009	(748500)
393	07/17/2009	(741607)
394	07/17/2009	(748489)
395	07/17/2009	(748521)
396	07/17/2009	(761599)
397	07/21/2009	(741126)
398	07/21/2009	(748906)
399	08/06/2009	(747389)
400	08/07/2009	(759876)
401	08/10/2009	(749006)
402	08/10/2009	(749069)
403	08/11/2009	(747513)
404	08/12/2009	(763679)
405	08/13/2009	(765694)
406	08/17/2009	(747005)
407	08/19/2009	(764588)
408	08/25/2009	(747519)
409	08/31/2009	(747366)
410	09/02/2009	(749680)
411	09/02/2009	(761345)
412	09/04/2009	(760698)
413	09/15/2009	(764199)
414	09/18/2009	(763300)
415	09/18/2009	(776092)
416	09/23/2009	(761038)
417	09/28/2009	(760699)
418	09/28/2009	(763305)
419	09/29/2009	(763519)
420	09/29/2009	(764060)

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

Date: 10/31/2004 (351832) CN600124705
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: 12/27/2004 (276826) CN600124705
Self Report? NO Classification: Moderate
Citation: 30 TAC Chapter 116, SubChapter B 116.115(b)
5C THC Chapter 382, SubChapter A 382.085(b)
TCEQ Air Permit No. 2933, GC #8 PERMIT
Description: Exceeded permit limits during an avoidable emissions event.

Date: 01/03/2005 (286756) CN600124705
Self Report? NO Classification: Moderate
Citation: 22779 PERMIT
30 TAC Chapter 116, SubChapter B 116.115(c)
5C THC Chapter 382, SubChapter A 382.085(b)
Description: Equistar failed to prevent an avoidable emissions event.

Date: 01/04/2005 (339104) CN600124705
Self Report? NO Classification: Moderate
Citation: 30 TAC Chapter 116, SubChapter B 116.115(b)(2)(G)
5C THC Chapter 382, SubChapter A 382.085(b)
Description: Equistar failed to prevent an avoidable emissions event.

Date: 01/10/2005 (343232) CN600124705
Self Report? NO Classification: Minor
Citation: 30 TAC Chapter 290, SubChapter D 290.45(d)(2)(B)(ii)
Description: Failure to provide an adequate ground storage capacity.
Self Report? NO Classification: Minor
Citation: 30 TAC Chapter 290, SubChapter D 290.45(d)(2)(B)(v)
Description: Failure to provide a minimum pressure tank capacity of 220 gallons.

Date: 04/20/2005 (372583) CN600124705
Self Report? NO Classification: Minor
Citation: 30 TAC Chapter 101, SubChapter F 101.201(g)
Description: Equistar failed to submit the Final Report electronically.
Self Report? NO Classification: Moderate
Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
5C THC Chapter 382, SubChapter A 382.085(b)
Permit No. 22779, Special Condition No.1 PERMIT
Description: Equistar failed to prevent an avoidable emissions event.

Date: 08/05/2005 (381400) CN600124705
Self Report? NO Classification: Minor
Citation: 30 TAC Chapter 117, SubChapter E 117.520(c)(2)(A)(ii)(II)
Description: Failure to test within 60 days following installation of NOx control equipment on furnace 3403.

Date: 08/05/2005 (393207) CN600124705
Self Report? NO Classification: Minor
Citation: 30 TAC Chapter 117, SubChapter E 117.520(c)(2)(A)(ii)(II)
Description: Failure to test within 60 days following installation of NOx control equipment on Furnace 4406.

Self Report? NO Classification: Minor
Citation: 30 TAC Chapter 117, SubChapter E 117.520(c)(2)(A)(ii)(II)
Description: Failure to test within 60 days following installation of NOx control equipment on F4410.
Self Report? NO Classification: Minor
Citation: 30 TAC Chapter 117, SubChapter E 117.520(c)(2)(A)(ii)(II)

Description: Failure to test within 60 days following installation of NOx control equipment on Furnace 4401.
Self Report? NO Classification: Minor
Citation: 30 TAC Chapter 117, SubChapter E 117.520(c)(2)(A)(ii)(II)
Description: Failure to test within 60 days following installation of NOx control equipment on Furnace 3401.

Date: 08/05/2005 (392610) CN600124705
Self Report? NO Classification: Minor
Citation: 30 TAC Chapter 117, SubChapter E 117.520(c)(2)(A)(ii)(II)
Description: Failure to test within 60 days following installation of NOx control equipment on Furnace 4404.

Date: 08/10/2005 (404514) CN600124705
Self Report? NO Classification: Moderate
Citation: 30 TAC Chapter 116, SubChapter B 116.115(b)
5C THC Chapter 382, SubChapter A 382.085(b)
TCEQ Permit #2128, GC #8 PERMIT
Description: Failure to prevent a leak in Tower T-301.

Date: 09/13/2005 (431694) CN600124705
Self Report? NO Classification: Minor
Citation: 30 TAC Chapter 290, SubChapter D 290.45(d)(2)(B)(ii)
Description: Failure to provide an adequate ground storage capacity.
Self Report? NO Classification: Minor
Citation: 30 TAC Chapter 290, SubChapter D 290.45(d)(2)(B)(v)
Description: Failure to provide a minimum pressure tank capacity of 220 gallons.

Date: 11/18/2005 (437299) CN600124705
Self Report? NO Classification: Minor
Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)
3130A, SC No. 4 PERMIT
O02179, ST&C No. 10 OP
Description: Failure to operate within pumping rates of Polyols(KOH) and (IMPACT).
Self Report? NO Classification: Minor
Citation: 30 TAC Chapter 117, SubChapter B 117.213(a)
Description: Failure to install the totalizing fuel flow meter on EGBVC6904.

Date: 12/08/2005 (434728) CN600124705
Self Report? NO Classification: Minor
Citation: 30 TAC Chapter 122, SubChapter C 122.222(k)(3)
Description: Failure to submit the off-permit notification for claiming the permit by rule for flare emissions.
Self Report? NO Classification: Minor
Citation: 30 TAC Chapter 106, SubChapter K 106.261(a)(6)
Description: Failure to register the PBR within 10 of increase in flare emissions.
Self Report? NO Classification: Moderate
Citation: 30 TAC Chapter 101, SubChapter A 101.20(1)
30 TAC Chapter 115, SubChapter D 115.352
30 TAC Chapter 116, SubChapter B 116.115(c)
40 CFR Chapter 60, SubChapter C, PT 60, SubPT VV 60.482-1(a)
49130, S.C. No.5 PERMIT
O-02180, S.C No.1A OP
Description: Failure to follow the fugitive monitoring for 172 valves and 5 pumps in the Isopropanol Unit
Self Report? NO Classification: Minor
Citation: 30 TAC Chapter 115, SubChapter D 115.354(5)
30 TAC Chapter 122, SubChapter B 122.143(4)
O-02180, SC. 1.A OP
Description: Failure to have required information on tags attached to visual fugitive leaks
Self Report? NO Classification: Moderate
Citation: 30 TAC Chapter 101, SubChapter A 101.20(2)

30 TAC Chapter 115, SubChapter D 115.352(4)
30 TAC Chapter 116, SubChapter B 116.115(c)
40 CFR Chapter 60, SubChapter C, PT 60, SubPT VV 60.482-6(a)(1)
49130, SC 5.E PERMIT
O-02180, SC 1.A OP

Description: Failure to cap or plug the five open-ended lines in VOC service
Self Report? NO Classification: Moderate
Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)
49130, S.C 7 PERMIT
O-02180, S.C 11 OP

Description: Failure to follow the procedure described in Appendix P, Section 5.5.1 for monitoring the cooling tower (CT-2401) as required by the permit condition
Self Report? NO Classification: Moderate
Citation: 30 TAC Chapter 122, SubChapter B 122.145(2)(A)

Description: Failure to report the deviations regarding the cooling tower monitoring in the deviation reports

Date: 12/19/2005 (438915) CN600124705

Self Report? NO Classification: Moderate
Citation: 30 TAC Chapter 122, SubChapter C 122.210(a)

Description: Failure to submit the federal operating permit (O-02177) minor revision application concurrent with the permit amendment issued on July 26, 2005 and permit by rules claimed in 1997 and 2002.

Self Report? NO Classification: Moderate
Citation: 22779, SC 1 PERMIT

30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)
O-02177, STC 10 OP

Description: Failure to operate tanks and loading arms within maximum allowable emission rates as permitted in the NSR permit 22779.

Self Report? NO Classification: Moderate
Citation: 22779, SC 8 PERMIT

30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)
O-02177, STC 10 OP

Description: Failure to initiate the fugitive monitoring for 22 valves and 3 pumps in the Polybutadiene Unit.

Self Report? NO Classification: Moderate
Citation: 22779, SC 8.E PERMIT

30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)
O-02177, STC 10 OP

Description: Failure to cap or plug the five open-ended lines in VOC service

Date: 12/31/2005 (440659) CN600124705

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: 02/22/2006 (450109) CN600124705

Self Report? NO Classification: Moderate
Citation: 24887 SC1.E PERMIT

30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)
O02176, SC 15 OP

Description: Failure to cap or plug the eighty five (85) open-ended lines in VOC service

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)

Description: Failure to register the PBRs 106.261 and 106.262 within 10 days of addition of a flare analyzer and failure to make off-permit notification concurrently.

Self Report? NO Classification: Moderate

Citation: 30 TAC Chapter 122, SubChapter B 122.142(b)(2)(B)
 Description: Failure to represent the several sources that are subject to 30 TAC 111 rules in the Title V Operating Permit.
 Self Report? NO Classification: Moderate
 Citation: 24887, SC 1 PERMIT
 30 TAC Chapter 116, SubChapter B 116.115(c)
 30 TAC Chapter 122, SubChapter B 122.143(4)
 O02176, SC 15 OP
 Description: Failure to include 19 valves and 39 connectors associated with sample systems and failure to include 5 pumps, 38 valves, 104 connectors, and 4 sample points in the fugitive monitoring database.
 Self Report? NO Classification: Moderate
 Citation: 30 TAC Chapter 115, SubChapter B 115.142
 30 TAC Chapter 122, SubChapter B 122.143(4)
 O02176, SC 5 OP
 Description: Failure to control the wastewater streams as required by 30 TAC 115.142.
 Self Report? NO Classification: Minor
 Citation: 30 TAC Chapter 122, SubChapter B 122.143(4)
 40 CFR Chapter 60, SubChapter C, PT 60, SubPT Kb 60.113b(b)(5)
 O02176, SC 1.A OP
 Description: Failure to make the tank seal inspection notification 30 days in advance.

Date: 02/28/2006 (451788) CN600124705
 Self Report? NO Classification: Minor
 Citation: 30 TAC Chapter 115, SubChapter D 115.352(4)
 30 TAC Chapter 116, SubChapter B 116.115(c)
 40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.167(a)(1)
 NSR Permit No. 8125, SC 6E PA
 Description: Failure to plug two open-ended-lines.
 Self Report? NO Classification: Minor
 Citation: 30 TAC Chapter 117, SubChapter B 117.213(a)
 Description: Failure to install fuel flow meter on Diesel Engine, P-3314.
 Self Report? NO Classification: Minor
 Citation: 40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.182(d)
 Description: Failure to include compressor information in the HON Subpart H Semiannual report.
 Self Report? NO Classification: Minor
 Citation: 40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.181(a)
 Description: Failure to maintain appropriate records of 220 connectors, 6 instrument systems, 4 PSVs, 2 pumps, and 101 valves.

Date: 03/24/2006 (457373) CN600124705
 Self Report? NO Classification: Minor
 Citation: 30 TAC Chapter 290, SubChapter D 290.45(d)(2)(B)(ii)
 Description: Failure to provide an adequate ground storage capacity.
 Self Report? NO Classification: Minor
 Citation: 30 TAC Chapter 290, SubChapter D 290.45(d)(2)(B)(v)
 Description: Failure to provide a minimum pressure tank capacity of 220 gallons.

Date: 03/28/2006 (453139) CN600124705
 Self Report? NO Classification: Minor
 Citation: 30 TAC Chapter 115, SubChapter D 115.352(4)
 40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.167(a)(1)
 5C THC Chapter 382, SubChapter A 382.085(b)
 NSR Permit No 2936, SC 10E PA
 O-02182 Special Terms and Condition 15 OP
 Description: Failed to plug 20 open-ended lines.
 Self Report? NO Classification: Minor
 Citation: 30 TAC Chapter 116, SubChapter B 116.110(a)(4)
 30 TAC Chapter 122, SubChapter B 122.143(4)
 30 TAC Chapter 122, SubChapter C 122.222(k)(2)
 5C THC Chapter 382, SubChapter A 382.085(b)
 O-02181 General Terms and Condition OP
 Description: The facility failed to register two tanks and one cooling tower within ten (10)

days of change as required during August 19, 2004 through November 22, 2004.

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

Description: O-02182 General Terms and Condition OP
Failure to include compressor information in the HON Subpart H semiannual report for the reporting period from February 28, 2005 through August 19, 2005.

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 THC Chapter 382, SubChapter A 382.085(b)
Special Condition No. 10F PA
Special Terms and Condition 15 OP

Description: failure to monitor 59 valves that were marked as unsafe to monitor during the third quarter of 2004 from August 19, 2004 through September 30, 2004.

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

Description: failure to put identification number for the leaking fugitive valves during August 19, 2004 through August 19, 2005.

Self Report? NO **Classification:** Minor
Citation: 30 TAC Chapter 115, SubChapter D 115.354
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 63.162(c)
5C THC Chapter 382, SubChapter A 382.085(b)
Special Terms and Condition 15 OP

Description: failure to include 89 connectors, 27 valves, and 19 pumps in the fugitive monitoring program during the third quarter of 2004 from August 19, 2004 through September 30, 2004.

Self Report? NO **Classification:** Minor
Citation: 30 TAC Chapter 116, SubChapter B 116.110(a)(1)
30 TAC Chapter 122, SubChapter B 122.143(4)
5C THC Chapter 382, SubChapter A 382.085(b)
General Terms and Condition OP

Description: failure to obtain a permit by rule (PBR) for the emission point no. SP-4010.

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

Description: failure to seal the external floating roof tank, TK-3112. The gasket on the rim vent was missing.

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)
SC No 1 of NSR Permit No. 2936. PA
Special Terms and Conditions 15 OP

Description: failure to obtain appropriate authorization for storing hydrocarbons for the tanks, TK-3113 and TK-3114.

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)
Special Condition 1 PA
Special Terms and Condition 15 OP

Description: failure to comply with the pounds per hour of VOC emission limit for tank No. TK-4002 of TCEQ Air Permit 2936.

Self Report? NO **Classification:** Minor
Citation: 30 TAC Chapter 116, SubChapter B 116.110(a)(1)
30 TAC Chapter 122, SubChapter B 122.143(4)

5C THC Chapter 382, SubChapter A 382.085(b)
General Terms and Conditions OP
Description: failure to obtain a permit by rule (PBR) for the analyzer vent.
Self Report? NO Classification: Minor
Citation: 30 TAC Chapter 122, SubChapter B 122.132(a)
5C THC Chapter 382, SubChapter A 382.085(b)
Description: Failure to include all the emission authorizations for the cooling tower were not represented in the title V permit.

Date: 03/29/2006 (459500) CN600124705
Self Report? NO Classification: Moderate
Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
5C THC Chapter 382, SubChapter A 382.085(b)
TCEQ Permit No. 2128 PERMIT
Description: Failure to prevent the release of unauthorized emissions from a railroad tank car PSV.

Date: 03/31/2006 (455940) CN600124705
Self Report? NO Classification: Minor
Citation: 30 TAC Chapter 122, SubChapter B 122.142(b)(2)
5C THC Chapter 382, SubChapter D 382.085(b)
Description: Failure to represent the two sources that are subject to 30 TAC 111 rules in the Title V Operating Permit O-02175.
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)
6245, SC 1 PERMIT
O02175, STC 10 OP
Description: Failure to operate tanks (TK30 & TK31) within maximum allowable emission rates as permitted in the NSR permit 6245.

Self Report? NO Classification: Minor
Citation: 30 TAC Chapter 101, SubChapter A 101.20(1)
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 D 382.085(b)
6245, SC 7.E PERMIT
O02175, STC 10 OP
O02175, STC 1A OP
Description: Failure to cap or plug the thirty-eight (38) open-ended lines in VOC service (C5 recovery unit).

Self Report? NO Classification: Minor
Citation: 30 TAC Chapter 101, SubChapter A 101.20(1)
30 TAC Chapter 122, SubChapter B 122.143(4)
40 CFR Chapter 60, SubChapter C, PT 60, SubPT VV 60.482-5(a)
5C THC Chapter 382, SubChapter D 382.085(b)
O02175, STC 1A OP
Description: Failure to equip the dimer drum feed sampling connection system with closed loop.

Self Report? NO Classification: Minor
Citation: 30 TAC Chapter 101, SubChapter A 101.20(1)
30 TAC Chapter 115, SubChapter D 115.354(5)
30 TAC Chapter 122, SubChapter B 122.143(4)
40 CFR Chapter 60, SubChapter C, PT 60, SubPT VV 60.486(b)(1)
5C THC Chapter 382, SubChapter D 382.085(b)
O02175, STC 1A OP
Description: Failure to have required information on tags attached to visual fugitive leaks

Self Report? NO Classification: Minor
Citation: 30 TAC Chapter 101, SubChapter A 101.20(1)
30 TAC Chapter 115, SubChapter D 115.352
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 60.482-1(a)

5C THC Chapter 382, SubChapter D 382.085(b)
6245, SC 7 PERMIT
O02175, STC 10 OP
O02175, STC 1A OP

Description: Failure to include 2 pumps, 32 valves, and 103 connectors in the C5 recovery unit in fugitive monitoring database.

Date: 05/16/2006 (463873)

CN600124705

Self Report? NO

Classification: Moderate

Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
5C THC Chapter 382, SubChapter A 382.085(b)
TCEQ Permit No. 2128 PERMIT

Description: Failure to prevent the release of unauthorized emissions from a leaking pipeline due to the removal of a blind.

Date: 05/24/2006 (465260)

CN600124705

Self Report? NO

Classification: Moderate

Citation: 30 TAC Chapter 122, SubChapter B 122.142(b)(2)
5C THC Chapter 382, SubChapter D 382.085(b)

Description: Failure to correctly represent the HON storage vessel provisions, HON container provisions, and 30 TAC 111 rules in the Title V Operating Permit O-02185.

Self Report? NO

Classification: Moderate

Citation: 30 TAC Chapter 115, SubChapter B 115.112(a)(2)(A)
30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)
40 CFR Part 63, Subpart G 63.119(c)(2)(II)
5C THC Chapter 382, SubChapter D 382.085(b)
O-02185, STC 16 OP
O-02185, STC 1A OP
Permit 6387, SC 2 PERMIT

Description: Failure to equip gasket on sample hatch cover and failure to have physical fasteners on float well cover on external floating roof tank (Tank 26).

Self Report? NO

Classification: Moderate

Citation: 30 TAC Chapter 115, SubChapter B 115.112(a)(2)(A)
30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)
40 CFR Part 63, Subpart G 63.119(b)(6)
6387, SC 2 PERMIT
O-02185, STC 16 OP
O-02185, STC 1A OP

Description: Failure to cover all the openings on internal floating roof tanks: Tank 37 and Tank 47 and failure to have physical fasteners on float well covers on internal floating roof tanks: Tank 37, 48, and 49.

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 Part 63, Subpart G 63.119(b)(1)
5C THC Chapter 382, SubChapter D 382.085(b)
6387, SC 2 PERMIT
O-02185, STC 1A OP
O-02185, STC 16 OP

Description: Failure to keep the floating roof of Tank 47 always in contact with liquid surface during the regular operations.

Self Report? NO

Classification: Moderate

Citation: 30 TAC Chapter 116, SubChapter B 116.110(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)
6387, SC 4.A PERMIT
O-02185, STC 16 OP

Description: Failure to obtain authorization for the emissions resulted from analyzer vents in the MTBE Unit

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)
6387, SC 2 PERMIT
O-02185, STC 1.A OP
O-02185, STC 16 OP

Description: Failure to cap or plug the sixty-one (61) open-ended lines in VOC service in MTBE Unit.

Self Report? NO Classification: Minor

Citation: 30 TAC Chapter 115, SubChapter D 115.354(5)
30 TAC Chapter 122, SubChapter B 122.143(4)
5C THC Chapter 382, SubChapter D 382.085(b)
O-02185, STC 1.A OP

Description: Failure to have required information on tags attached to visual fugitive leaks in the MTBE Unit.

Self Report? NO Classification: Minor

Citation: 30 TAC Chapter 115, SubChapter D 115.352
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(a)
5C THC Chapter 382, SubChapter D 382.085(b)
6387, SC 5 PERMIT
O-02185, STC 1.A OP
O-02185, STC 16 OP

Description: Failure to include 2 valves in the MTBE Unit in fugitive monitoring database and comply with the fugitive monitoring requirements.

Self Report? NO Classification: Moderate

Citation: 30 TAC Chapter 115, SubChapter B 115.142
30 TAC Chapter 122, SubChapter B 122.143(4)
5C THC Chapter 382, SubChapter D 382.085(b)
O-02185, SC 5 OP

Description: Failure to control the one wastewater stream (T-1215) as required by 30 TAC 115.142 in MTBE Unit.

Self Report? NO Classification: Minor

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(2)(C)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT G 63.120(b)(9)
6387, SC 2 PERMIT
O-02185, STC 1.A OP
O-02185, STC 16 OP

Description: Failure to make the tank seal inspection (Tank-26) notification 30 days in advance in MTBE Unit.

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)
6387, SC 2 PERMIT
O-02185, STC 1.A OP
O-02185, STC 16 OP

Description: Failure to comply with HON process wastewater provisions for two containers in MTBE Unit.

Date: 06/26/2006 (464019) CN600124705

Self Report? NO Classification: Moderate

Citation: 00391-000 PERMIT
30 TAC Chapter 319, SubChapter A 319.7(a)

Description: Failure to document the sample collection time and the identify of the sample personnel for the Outfall 001 24 hour composite samples.

Date: 07/28/2006 (484749) CN600124705

Self Report? NO Classification: Moderate

Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
5C THC Chapter 382, SubChapter D 382.085(b)
No. 22779, Special Condition No. 1 PERMIT

Description: Equistar failed to prevent this emissions event

Date: 08/15/2006 (489890) CN600124705
Self Report? NO Classification: Minor
Citation: 30 TAC Chapter 335, SubChapter A 335.6(c)
Description: Failure to update Notice of Registration

Date: 08/16/2006 (457265) CN600124705
Self Report? NO Classification: Moderate
Citation: 30 TAC Chapter 115, SubChapter C 115.212(a)(1)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT G 63.135(e)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT G 63.152(b)
5C THC Chapter 382, SubChapter D 382.085(b)
Description: Failure to control emissions from drum D3075 and from tank TK20.

Self Report? NO Classification: Moderate
Citation: 2128, SC 10E PERMIT
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 63, SubChapter C, PT 63, SubPT H 63.167(a)(1)
5C THC Chapter 382, SubChapter D 382.085(b)
O-02184, ST&C 18 OP
O-02184, ST&C 1A OP

Description: Failure to cap or plug 174 open ended lines in VOC service.
Self Report? NO Classification: Moderate
Citation: 40 CFR Chapter 63, SubChapter C, PT 63, SubPT A 63.6(e)(3)(i)
5C THC Chapter 382, SubChapter D 382.085(b)
Description: Failure to have a Startup/Shutdown/Malfunction plan to address visible emissions from east plant flare.

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 63.163(b)
5C THC Chapter 382, SubChapter D 382.085(b)
O-02184, ST&C 1A OP

Description: Failure to conduct monthly monitoring on 4 HON pumps in January 2005.
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 63.166(a)
5C THC Chapter 382, SubChapter D 382.085(b)
O-02184, ST&C 1A OP

Description: Failure to equip a sample point with a closed loop system on reactor effluent and T1204 overhead.

Self Report? NO Classification: Moderate
Citation: 30 TAC Chapter 115, SubChapter D 115.354(5)
30 TAC Chapter 115, SubChapter H 115.782(a)
30 TAC Chapter 122, SubChapter B 122.143(4)
5C THC Chapter 382, SubChapter D 382.085(b)
O-02184, ST&C 1H OP

Description: Failure to have identification numbers on the fugitive leak tags attached to 51 components.

Self Report? NO Classification: Moderate
Citation: 30 TAC Chapter 116, SubChapter B 116.110(a)(1)
30 TAC Chapter 122, SubChapter B 122.132(a)
5C THC Chapter 382, SubChapter D 382.085(b)

Description: Failure to authorize emissions from sampling in the tank farm.
Self Report? NO Classification: Moderate
Citation: 2128, SC 10 PERMIT
30 TAC Chapter 115, SubChapter D 115.352(1)
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)
O-02184, ST&C 18 OP
O-02184, ST&C 1A OP

Description: Failure to include 16 pumps, 45 valves, and 292 connectors in the fugitive monitoring database.

Self Report? NO Classification: Moderate

Citation: 30 TAC Chapter 122, SubChapter B 122.143(4)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT G 63.132(a)
5C THC Chapter 382, SubChapter D 382.085(b)
O-02184, ST&C 13 OP

Description: Failure to control emissions from 3 wastewater streams (D-78, D-3055, D-03102).

Date: 11/30/2006 (544284) CN600124705

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: 02/01/2007 (538420) CN600124705

Self Report? NO Classification: Moderate

Citation: 2933 Special Condition 1 PERMIT
30 TAC Chapter 116, SubChapter B 116.115(c)
5C THC Chapter 382, SubChapter A 382.085(b)

Description: Failure to prevent process water collection system back-up.

Date: 03/31/2007 (574938) CN600124705

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: 04/11/2007 (532608) CN600124705

Self Report? NO Classification: Moderate

Citation: 30 TAC Chapter 122, SubChapter B 122.132(a)
5C THC Chapter 382, SubChapter D 382.085(b)

Description: Failure to include Polyols loading emissions in federal operating permit O-02179.

Date: 04/18/2007 (593172) CN600124705

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: 07/24/2007 (567353) CN600124705

Self Report? NO Classification: Moderate

Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
5C THC Chapter 382, SubChapter D 382.085(b)
No. 1768, Special Condition No. 1 PERMIT

Description: Equistar failed to prevent a hole in a 1/4 inch nipple off of the flow orifice of the charge gas compressor.

Date: 07/31/2007 (607499) CN600124705

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: 07/31/2007 (543338) CN600124705

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)
5C THC Chapter 382, SubChapter D 382.085(b)
FOP O-02175 SC 12 OP
FOP O-02175 SC 1A OP
NSR 6245 SC 7(E) PA

Description: Failure to equip lines in VOC service with caps/plugs from January 24 through December 6, 2006 (NSR 6245; FOP O-02175).

Self Report? NO Classification: Moderate

Citation: 30 TAC Chapter 115, SubChapter D 115.354(5)
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)
FOP O-02175 SC 12 OP
FOP O-02175 SC 1A OP
NSR 6245 SC 7(H) PA

Description: Failure to equip leaking pumps in VOC and HRVOC service with the required tags from January 10 through May 8, 2006 (NSR 6245; FOP O-02175).

Self Report? NO Classification: Moderate

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)
40 CFR Chapter 60, SubChapter C, PT 60, SubPT VV 60.482-2(c)(1)
40 CFR Chapter 60, SubChapter C, PT 60, SubPT VV 60.482-8(c)
5C THC Chapter 382, SubChapter D 382.085(b)
FOP O-02175 SC 12 OP
FOP O-02175 SC 1A OP
NSR 6245 SC 7(I) PA

Description: Failure to repair pumps and connectors within the required time frames (NSR

6245; FOP O-02175).

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 60.487(c)(2)(iv)
5C THC Chapter 382, SubChapter D 382.085(b)
FOP O-02175 SC 1A OP

Description: Failure to submit an accurate semiannual report on August 29, 2006 for fugitive equipment leak components subject to NSPS subpart VV to indicate that leaking pumps were on delay of repair list (NSR 6245; FOP O-02175).

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 60.487(c)(2)(vii)
5C THC Chapter 382, SubChapter D 382.085(b)
FOP O-02175 SC 1A OP

Description: Failure to submit an accurate semiannual report on August 29, 2006 for fugitive equipment leak components subject to NSPS subpart VV to indicate the reason that leaking pumps were on delay of repair list (NSR 6245; FOP O-02175).

Self Report? NO Classification: Moderate

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)
40 CFR Chapter 60, SubChapter C, PT 60, SubPT VV 60.482-1(a)
5C THC Chapter 382, SubChapter D 382.085(b)
FOP O-02175 SC 12 OP
FOP O-02175 SC 1A OP
NSR 6245 SC 7 PA

Description: Equistar failed to include 21 connectors and 8 valves in the C5 Recovery LDAR monitoring program (NSR 6245; FOP O-02175).

Date: 11/30/2007 (619407)

CN600124705

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: 03/06/2008 (610691)

CN600124705

Self Report? NO Classification: Minor

Citation: 30 TAC Chapter 122, SubChapter B 122.143(4)
40 CFR Chapter 60, SubChapter C, PT 60, SubPT Kb 60.112b(a)(1)(iv)
40 CFR Chapter 61, SubChapter C, PT 61, SubPT FF 61.351(a)(1)
5C THSC Chapter 382 382.085(b)
O-02180 Special Condition #1A OP

Description: Failure to have the required bolts on the float well gauges.

Self Report? NO Classification: Minor

Citation: 30 TAC Chapter 115, SubChapter H 115.725
30 TAC Chapter 122, SubChapter B 122.143(4)
5C THSC Chapter 382 382.085(b)
O-02180 Special Condition #1J OP

Description: Failure to conduct the initial and quarterly multi-point calibrations.

Self Report? NO Classification: Minor

Citation: 30 TAC Chapter 115, SubChapter H 115.722(d)(2)
30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)
49130 Special Condition #8A PERMIT
5C THSC Chapter 382 382.085(b)
O-02180 Special Condition #1(J) OP
O-02180 Special Condition #11 OP

Description: Failure to not exceed actual flare tip velocity.

Self Report? NO Classification: Minor

Citation: 30 TAC Chapter 122, SubChapter B 122.143(4)
40 CFR Chapter 60, SubChapter C, PT 60, SubPT Kb 60.112b(a)(1)(iv)
40 CFR Chapter 60, SubChapter C, PT 60, SubPT Kb 60.112b(a)(1)(v)
40 CFR Chapter 61, SubChapter C, PT 61, SubPT FF 61.351(a)(1)
5C THSC Chapter 382 382.085(b)
O-02180 Special Condition #1A OP

Description: Failure to seal the tank's, MIPTK2615, vacuum vent that was found open during an annual inspection.

Self Report? NO Classification: Minor

Citation: 30 TAC Chapter 117, SubChapter B 117.206(i)
30 TAC Chapter 122, SubChapter B 122.143(4)
5C THSC Chapter 382 382.085(b)
O-02180 Special Condition #1(l) OP

Description: Failure to conduct engine testing during appropriate operating hours.

Self Report? NO Classification: Minor

Citation: 30 TAC Chapter 115, SubChapter H 115.722(d)(1)
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)
O-02180 Special Condition #11 OP
O-02180 Special Condition #1J OP
Special Condition #8A PERMIT

Description: Velocity to the flare, MIPFL2501, was exceeded during the process of activating the reactor catalyst during nine one hour periods.

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)
40 CFR Part 60, Subpart VV 60.482-6
49130 Special Condition #5E PERMIT
5C THSC Chapter 382 382.085(b)
O-02180 Special Condition #11 OP
O-02180 Special Condition #1A OP
O-02180 Special Condition #1J OP

Description: Failure to prevent one open-ended line found in VOC service.

Self Report? NO Classification: Minor

Citation: 30 TAC Chapter 115, SubChapter H 115.722(d)(1)
30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)
49130 Special Condition #8A PERMIT
5C THSC Chapter 382 382.085(b)

O-02180 Special Condition #11 OP
O-02180 Special Condition #1J OP
Description: Permit limits to the flare, MIPFL2501, were exceeded due to incorrect factor used in permit calculation.

Date: 03/07/2008 (596061) CN600124705
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 THSC Chapter 382 382.085(b)
FOP O-02179 SC 10 OP
NSR Permit 3130A SC 8E PA
Description: Failed to seal an open ended line.

Date: 03/27/2008 (611770) CN600124705
Self Report? NO Classification: Moderate
Citation: 30 TAC Chapter 335, SubChapter F 335.152(a)(8)
40 CFR Chapter 264, SubChapter I, PT 264, SubPT J 264.191(a)
PP II-C-2-h PERMIT
Description: Tank system assessment and certification was not adequate.
Self Report? NO Classification: Moderate
Citation: 30 TAC Chapter 335, SubChapter F 335.152(a)(8)
40 CFR Chapter 264, SubChapter I, PT 264, SubPT J 264.193(e)(1)(iii)
PP-II-C-2-h PERMIT
Description: Coating for the secondary containment showed visible cracks.

Date: 03/31/2008 (689830) CN600124705
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: 04/04/2008 (610663) CN600124705
Self Report? NO Classification: Moderate
Citation: 30 TAC Chapter 122, SubChapter B 122.143(4)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT G 63.119(b)(6)
5C THSC Chapter 382 382.085(b)
Special Condition (SC) #1A OP
Description: Failed to equip the gauge float wells with bolts or fasteners on the covers of the roof openings of Tanks 3102, 3111A, 3111B, and 3113, to ensure that the openings are air tight.

Self Report? NO Classification: Minor
Citation: 30 TAC Chapter 115, SubChapter B 115.112(a)(2)(A)
30 TAC Chapter 122, SubChapter B 122.143(4)
5C THSC Chapter 382 382.085(b)
SC #1A OP

Description: Failure to have tank 3114's piping on the existing internal ladder way closed to the liquid from April 18, 2007 through July 27, 2007.

Self Report? NO Classification: Moderate
Citation: 30 TAC Chapter 122, SubChapter B 122.143(4)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT G 63.119(b)(1)
5C THSC Chapter 382 382.085(b)
SC #1 PERMIT
SC #s 1 and 15 OP

Description: Failure to have Tank 3102 floating roof set on the roof legs on August 23, 2006. This constitutes a violation of New Source Review (NSR) Permit #2936, Special Condition (SC) #1 and 40 CFR 63.119(b)(1). (B19(g)(1))

Self Report? NO Classification: Moderate
Citation: 30 TAC Chapter 115, SubChapter H 115.767(1)
30 TAC Chapter 122, SubChapter B 122.143(4)
5C THSC Chapter 382 382.085(b)
SC #1K(iv) OP

Description: Failure to have cooling tower differential pressure fall below 5 psig for one

minute on October 7, 2006. (B19(g)(1))
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)
5C THSC Chapter 382 382.085(b)
SC #1A OP
SC #8E PERMIT
Description: Failure to have an open ended line in volatile organic compound (VOC) service on
February
9, 2007. This constitutes a violation of NSR Permit #2936, SC #10, 30 TAC
115.352(4), and 40
CFR 63.167(a)(1). (C10)

Date: 05/02/2008 (610690) CN600124705

Self Report? NO Classification: Minor
Citation: 30 TAC Chapter 117, SubChapter B 117.203(a)(12)
30 TAC Chapter 122, SubChapter B 122.143(4)
5C THSC Chapter 382 382.085(b)
O-02181 Special Condition #1A OP
Description: Failure to prevent the diesel firewater pumps from exceeding the 100 hour
runtime limit based on the rolling 12 month average.

Self Report? NO Classification: Minor
Citation: 2128 Special Condition #8E PERMIT
24887 Special Condition #1E PERMIT
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)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.167(a)(1)
49120 Special Condition #2D PERMIT
5C THSC Chapter 382 382.085(b)
6245 Special Condition #7E PERMIT
O-02181 Special Condition #1(l) OP
O-02181 Special Condition #1A OP
O-02181 Special Condition #22 OP

Description: Failure to seal 8 open-ended lines in VOC service.

Self Report? NO Classification: Minor
Citation: 30 TAC Chapter 115, SubChapter H 115.764(a)(1)
30 TAC Chapter 122, SubChapter B 122.143(4)
5C THSC Chapter 382 382.085(b)
O-02181 Special Condition #1(l) OP

Description: Failure to perform the yearly preventative maintenance (PM).

Self Report? NO Classification: Minor
Citation: 30 TAC Chapter 115, SubChapter C 115.244
30 TAC Chapter 122, SubChapter B 122.143(4)
5C THSC Chapter 382 382.085(b)
O-02181 Special Condition #6D OP

Description: Failure to conduct the Stage II vapor recovery daily inspection.

Self Report? NO Classification: Minor
Citation: 30 TAC Chapter 106, SubChapter S 106.433(2)(C)
30 TAC Chapter 122, SubChapter B 122.143(4)
5C THSC Chapter 382 382.085(b)
O-02181 Special Condition #22 OP

Description: Failure to properly seal three containers of a solvent that were left open in the
unit.

Self Report? NO Classification: Minor
Citation: 30 TAC Chapter 122, SubChapter B 122.143(4)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT G 63.152(f)
5C THSC Chapter 382 382.085(b)
O-02181 Special Condition #1A OP

Description: Failure to maintain continuous monitoring data in historian for the Alkyl Flare
volumetric flow.

Date: 06/16/2008 (610615) CN600124705

Self Report? NO Classification: Moderate

Citation: 30 TAC Chapter 115, SubChapter B 115.112(d)(2)(H)
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 G 63.119(b)(1)
5C THSC Chapter 382 382.085(b)
FOP No. O-2183 ST&C 12 OP
Permit No. 8125, SC 1 PERMIT

Description: RE had unauthorized emissions of VOC for Methanol Tank TK-5102.

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 G 63.119(b)(6)
5C THSC Chapter 382 382.085(b)
FOP O-2183 ST&C 12 OP
Permit No. 8125, SC 2B PERMIT

Description: RE failed to ensure that the cap on the gauge float well was kept air-tight with a bolt or fastener on three tanks.

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)
FOP No. O-2183, ST&C 12 OP
FOP No. O-2183, ST&C 1A OP
Permit No. 8125, SC 6 PERMIT

Description: RE had failed to seal 3 open-ended lines in VOC service.

Date: 06/17/2008 (636281) **CN600124705**

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)
Special Condition #15 OP
Special Condition #1E PERMIT

Description: Failure to seal 20 open-ended lines in VOC 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)
5C THSC Chapter 382 382.085(b)
Special Condition #15 OP
Special Condition #1F PERMIT

Description: Failure to monitor two valves in VOC service.

Date: 07/03/2008 (636094) **CN600124705**

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)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.167(a)(1)
5C THSC Chapter 382 382.085(b)
SC #18 OP
SC #8E PERMIT
Special Condition (SC) #1A OP

Description: failure to seal twenty-five open ended lines in volatile organic compound service.
(Category C10)

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)
SC #1 PERMIT
SC #18 OP

Description: Failed to comply with the hourly emission limits of 1.65 lbs per hour ("lbs/hr") for VOCs and 0.14 lbs/hr of 1,3 butadiene intermittently from January 6, 2009 (the

date the bankruptcy petition was filed) to present.
 Self Report? NO Classification: Minor
 Citation: 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)
 40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.162(f)(1)
 5C THSC Chapter 382 382.085(b)
 SC #18 OP
 SC #1A OP
 SC #8I PERMIT
 Description: failure to tag a leaking seal.

Self Report? NO Classification: Minor
 Citation: 30 TAC Chapter 115, SubChapter D 115.352(2)
 30 TAC Chapter 115, SubChapter H 115.782(b)(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 63.174(d)
 5C THSC Chapter 382 382.085(b)
 SC #1 OP
 SC #18 OP
 SC #8I PERMIT
 Description: Failure to make a first attempt for repair on two leaking components (Category C4 violation).

Self Report? NO Classification: Minor
 Citation: 30 TAC Chapter 115, SubChapter H 115.781(b)
 30 TAC Chapter 122, SubChapter B 122.143(4)
 5C THSC Chapter 382 382.085(b)
 SC #1A OP
 Description: failure to follow Reference Method 21 for twenty-five components

Date: 07/18/2008 (681438) CN600124705
 Self Report? NO Classification: Moderate
 Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
 5C THSC Chapter 382 382.085(b)
 Special Condition #1 PERMIT
 Description: Failure to prevent an electrical power loss and the mechanical failure of a Process Safety Valve Bellow which resulted in flaring and a Process Safety Valve Bellow leak.

Date: 07/30/2008 (687221) CN600124705
 Self Report? NO Classification: Moderate
 Citation: #2933 S.C. 1 PERMIT
 30 TAC Chapter 116, SubChapter B 116.115(c)
 5C THSC Chapter 382 382.085(b)
 Description: Failure to meet the affirmative defense for Incident #108500 regarding a pipe failure in D-4333.

Date: 08/01/2008 (681437) CN600124705
 Self Report? NO Classification: Moderate
 Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
 5C THSC Chapter 382 382.085(b)
 Special Condition #1 PERMIT
 Description: Failure to prevent a hole in the first feed system line which resulted in a release of volatile organic compounds.

Date: 08/11/2008 (610620) CN600124705
 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)
 ST&C 1A OP
 Description: Failure to collect flair HRVOC samples by the 10th hour after analyzer malfunction.

Self Report? NO Classification: Minor

Citation: 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 THSC Chapter 382 382.085(b)
SC 8H PERMIT
ST&C 10 OP

Description: Failure to tag leaking component in VOC service.

Date: 08/11/2008 (637040) CN600124705

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)
Special Conditions, No. 4A PERMIT
Special Terms and Conditions, No. 18 OP
Special Terms and Conditions, No. 1A OP

Description: Failure to control emissions of VOC from a process safety valve (PSV)
99PVRLS00 on MTBE Tank TK-19.

Self Report? NO Classification: Minor

Citation: 30 TAC Chapter 122, SubChapter B 122.143(4)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT G 63.119(b)(6)
5C THSC Chapter 382 382.085(b)
Special Terms and Conditions, No. 1A OP

Description: Failure to keep the cover on a gauge float well air-tight with a bolt or fastener on
tank TK-37.

Self Report? NO Classification: Minor

Citation: 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 63, SubChapter C, PT 63, SubPT H 63.167(a)(1)
5C THSC Chapter 382 382.085(b)
Special Condition No. 6E PERMIT
Special Terms and Conditions, No. 18 OP
Special Terms and Conditions, No. 1H OP

Description: Failure to seal 15 open-ended valves or lines with a cap, blind flange, plug or a
second valve.

Date: 08/13/2008 (682388) CN600124705

Self Report? NO Classification: Moderate

Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
5C THSC Chapter 382 382.085(b)
TCEQ Air Permit #2128, SC# 1 PA

Description: Equistar failed to prevent the seal leak from pump P-368B while adjusting the
pump shaft during the coupling of the motor to the pump.

Date: 08/27/2008 (638212) CN600124705

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 Part 60, Subpart VV 60.482-6
5C THSC Chapter 382 382.085(b)
FOP O-02175 Special Condition 12 OP
Permit 6245, Special Condition 7H PERMIT

Description: Failure to cap open-ended lines.

Self Report? NO Classification: Moderate

Citation: 30 TAC Chapter 115, SubChapter D 115.354(5)
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 63.162(f)(1)
5C THSC Chapter 382 382.085(b)
FOP No. O-02175, Special Conditions 12 OP
Permit No. 6245, Special Condition 7H PERMIT

Description: Failure to tag compressor seal.

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)
40 CFR Chapter 60, SubChapter C, PT 60, SubPT VV 60.482-7(c)(1)
5C THSC Chapter 382 382.085(b)
FOP No. O-02175, Special Condition 12 OP
Permit 6245, Special Condition 7H PERMIT

Description: Failure to monitor valves.

Date: 08/29/2008 (681367) CN600124705

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)
5C THSC Chapter 382 382.085(b)
FOP O-02174 STC 21 OP
NSR Permit 2933 SC 13E PA

Description: LB failed to seal 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)
5C THSC Chapter 382 382.085(b)
FOP O-02174 STC 21 OP
NSR 2933 SC 10 PA

Description: Failure to continuously monitor the fuel gas.

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)
FOP O-2174 STC 21 OP
NSR 2933 SC 1 PA

Description: Failure to maintain hourly tank (Tk-48008 & Tk-4917) emissions within the MAERT.

Self Report? NO Classification: Minor

Citation: 30 TAC Chapter 117, SubChapter B 117.345(b)(1)
5C THSC Chapter 382 382.085(b)

Description: Failed to submit test notification within required time frame.

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)
FOP O-02174 STC 21 OP
NSR 2933 SC 1 PA

Description: Failure to maintain Tk-48304 emissions within the MAERT, due to operations.

Self Report? NO Classification: Moderate

Citation: 30 TAC Chapter 117, SubChapter B 117.310(c)(1)
5C THSC Chapter 382 382.085(b)

Description: Failure to maintain furnace CO emissions within allowable limits.

Self Report? NO Classification: Minor

Citation: 30 TAC Chapter 122, SubChapter B 122.143(4)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT G 63.119(b)(6)
5C THSC Chapter 382 382.085(b)
FOP O-2174 STC 1A OP

Description: Failure to install proper bolts on floating roof tanks

Self Report? NO Classification: Minor

Citation: 30 TAC Chapter 117, SubChapter B 117.310(c)(1)
5C THSC Chapter 382 382.085(b)

Description: Failure to maintain diesel engine CO emissions less than limit.

Self Report? NO Classification: Moderate

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 TT 63.1004(a)(1)(i)
5C THSC Chapter 382 382.085(b)
FOP O-02174 STC 1E OP
NSR 2933 SC 13F PA

Description: Failure to monitor valves in VOC/EMACT service
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 UU 63.1027(b)
5C THSC Chapter 382 382.085(b)
FOP O-2174 STC 21 OP
NSR 2933 SC 15 PA
NSR 2933 SC 16 PA

Description: Failure to monitor connectors in VOC service.
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 THSC Chapter 382 382.085(b)
FOP O-2174 STC 1A OP

Description: Failure to continuously record parameters.
Self Report? NO Classification: Minor
Citation: 30 TAC Chapter 115, SubChapter D 115.354(5)
5C THSC Chapter 382 382.085(b)
FOP O-2174 STC 1A OP
NSR 2933 SC 13 H PA

Description: Failure to tag leaking components

Date: 09/09/2008 (681362) CN600124705
Self Report? NO Classification: Moderate
Citation: 30 TAC Chapter 115, SubChapter H 115.725(d)(2)(A)(i)
5C THSC Chapter 382 382.085(b)

Description: Failed to calibrate OP-1 GC Analyzer within specifications
Self Report? NO Classification: Moderate
Citation: 30 TAC Chapter 115, SubChapter H 115.725(d)(3)
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)
FOP O-1426 STC 22 OP
NSR Permit 1768 SC 13D PA

Description: Failed to maintain the OP-1 GC Analyzer downtime to less than 5%.
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 THSC Chapter 382 382.085(b)
FOP 1426 General Terms and Conditions OP

Description: Failed to report all instances of deviations.
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 UU 63.1033(b)(1)
5C THSC Chapter 382 382.085(b)
FOP O-1426 STC 22 OP
NSR Permit 1768 SC 14E PA

Description: Failed to maintain a seal on open-ended lines.
Self Report? NO Classification: Minor
Citation: 30 TAC Chapter 115, SubChapter H 115.722(c)(1)
5C THSC Chapter 382 382.085(b)

Description: Failed to maintain HRVOC emissions within 1,200 lbs/hr cap.

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)
FOP O-1426 STC 22 OP
NSR Permit 1768 SC 10 PA

Description: Failed to continuously monitor the fuel gas.
Self Report? NO Classification: Minor
Citation: 30 TAC Chapter 117, SubChapter B 117.345(c)

Description: 5C THSC Chapter 382 382.085(b)
 Failed to submit test report within 60 days.
 Self Report? NO Classification: Minor
 Citation: 30 TAC Chapter 115, SubChapter D 115.354(5)
 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 63.181(b)
 5C THSC Chapter 382 382.085(b)
 FOP O-1426 STC 1A OP
 FOP O-1426 STC 22 OP
 NSR Permit 1768 SC 14H PA

Description: Failed to tag a leaking component, upon discovery.
 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)
 FOP O-1426 STC 22 OP
 NSR Permit 1768 SC 5E PA

Description: Failed to install submerged fill pipe on storage tanks.
 Self Report? NO Classification: Minor
 Citation: 30 TAG Chapter 122, SubChapter B 122.143(4)
 40 CFR Chapter 60, SubChapter C, PT 60, SubPT K 60.112(a)(1)
 40 CFR Chapter 63, SubChapter C, PT 63, SubPT G 63.119(b)(6)
 40 CFR Chapter 63, SubChapter C, PT 63, SubPT WW 63.1063(a)(2)(vi)
 5C THSC Chapter 382 382.085(b)
 FOP O-1426 STC 1A OP

Description: Failed to install float well gauge bolts.
 Self Report? NO Classification: Minor
 Citation: 30 TAC Chapter 117, SubChapter B 117.345(b)(2)
 5C THSC Chapter 382 382.085(b)

Description: Failed to submit post RATA within 15 days.
 Self Report? NO Classification: Minor
 Citation: 30 TAC Chapter 115, SubChapter H 115.766(a)(6)
 5C THSC Chapter 382 382.085(b)

Description: Failed to complete the HRVOC Corrective Action Plan.
 Self Report? NO Classification: Minor
 Citation: 30 TAC Chapter 117, SubChapter B 117.340(f)(1)
 30 TAC Chapter 117, SubChapter G 117.8100(a)(1)(C)
 5C THSC Chapter 382 382.085(b)

Description: Failed to perform Cylinder Gas Audit in accordance with audit specifications.
 Self Report? NO Classification: Minor
 Citation: 30 TAC Chapter 117, SubChapter G 117.8140(b)
 5C THSC Chapter 382 382.085(b)

Description: Failed to test diesel engine on a quarterly 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 THSC Chapter 382 382.085(b)
 FOP O-1426 STC 1A OP

Description: Failed to continuously record parameters.
 Self Report? NO Classification: Minor
 Citation: 30 TAC Chapter 115, SubChapter H 115.782(c)(2)(A)(i)
 5C THSC Chapter 382 382.085(b)

Description: Failed to conduct Extra-Ordinary Efforts.

Date: 10/31/2008 (727385) CN600124705
 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: 10/31/2008 (705305) CN600124705
 Self Report? NO Classification: Minor
 Citation: 30 TAC Chapter 122, SubChapter B 122.143(4)

40 CFR Chapter 63, SubChapter C, PT 63, SubPT G 63.119(b)(6)
5C THSC Chapter 382 382.085(b)
FOP O-2174 STC 1A OP

Description: Failure to install proper bolts on floating roof tanks

Date: 11/30/2008 (727386) CN600124705
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: 12/05/2008 (707275) CN600124705
Self Report? NO Classification: Moderate
Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
5C THSC Chapter 382 382.085(b)
TCEQ Air Permit #1768, SC #1 PA
Description: Equistar failed to prevent the exchanger leak into Olefins 1 Cooling Tower which resulted in this emissions event.
Self Report? NO Classification: Moderate
Citation: 30 TAC Chapter 101, SubChapter F 101.201(a)(1)(B)
5C THSC Chapter 382 382.085(b)
Description: Equistar failed to report the emissions event within 24 hours of discovery.

Date: 01/09/2009 (721591) CN600124705
Self Report? NO Classification: Moderate
Citation: 30 TAC Chapter 111, SubChapter A 111.111(a)(1)(B)
5C THSC Chapter 382 382.085(b)
Description: Equistar failed to prevent excess opacity during an abrasive transfer.

Date: 01/16/2009 (709781) CN600124705
Self Report? NO Classification: Minor
Citation: 30 TAC Chapter 115, SubChapter B 115.122(a)(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 A 60.18(c)(3)(ii)
5C THSC Chapter 382 382.085(b)
NSR 49130, Special Condition 8A PERMIT
O-02180 Special Condition 11 OP
Description: Failure to maintain the IPOH flare above the minimum net heating value of 300 BTU/scf for four one-hour periods on 10/26/2007.

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)
5C THSC Chapter 382 382.085(b)
O-02180 Special Condition 1(A) OP

Description: Failure to conduct monthly pump monitoring on 23 pumps in the MIPFG unit.
Self Report? NO Classification: Moderate
Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)
49130, Special Condition 1 PERMIT
5C THSC Chapter 382 382.085(b)
O-02180 Special Condition 11 OP

Description: Failure to stay within their permitted emissions limits in the MAERT.
Self Report? NO Classification: Minor
Citation: 30 TAC Chapter 122, SubChapter B 122.143(4)
40 CFR Chapter 60, SubChapter C, PT 60, SubPT Kb 60.112b(a)(1)(iv)
5C THSC Chapter 382 382.085(b)
O-02180, Special Condition 1(A) OP

Description: Failure to maintain the required bolt on the float well gauge on tank TK-3110, Unit ID MIPTK3310, and tank TK-2615, Unit ID MIPTK2615.

Date: 03/31/2009 (768262) CN600124705
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: 04/28/2009 (737713) CN600124705

Self Report? NO Classification: Minor
Citation: 30 TAC Chapter 101, SubChapter F 101.201(b)(1)(H)
5C THSC Chapter 382 382.085(b)
Description: Equistar Chemicals LP (Equistar), Channelview Complex, failed to provide the permit number governing the facilities involved in the emissions event.
Self Report? NO Classification: Moderate
Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
5C THSC Chapter 382 382.085(b)
Special Condition #1 PERMIT
Description: Equistar failed to prevent unauthorized emissions, by a leak due to improper installation, incorrect selection of the gasket, and the pre-existing piping misalignment in its PolyBD unit.

Date: 05/04/2009 (738986) CN600124705

Self Report? NO Classification: Minor
Citation: 30 TAC Chapter 319, SubChapter A 319.11(b)
Description: Failure to utilize the proper analytical methods and techniques for total chlorine residual.

Date: 07/03/2009 (747361) CN600124705

Self Report? NO Classification: Minor
Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
5C THSC Chapter 382 382.085(b)
No. 2933, Special Condition #1 PERMIT
Description: Failure to prevent unauthorized emissions; specifically, Equistar failed to maintain fuel gas to Superheaters F-48001A/B resulting in a shutdown, causing the CPI Separator vent stream to route 48.5 pounds of unauthorized Volatile Organic Compounds (VOCs) to the atmosphere.

Date: 07/07/2009 (744818) CN600124705

Self Report? NO Classification: Minor
Citation: 30 TAC Chapter 111, SubChapter A 111.111(a)(4)(A)
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)(1)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT A 63.11(b)(4)
5C THSC Chapter 382 382.085(b)
Special Condition 4C PERMIT
Special Terms and Conditions 1A OP
Special Terms and Conditions 22 OP
Description: Failure to maintain steam going to flare resulting in a smoking flare. (CATEGORY C4 violation)
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)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.163(b)(1)
5C THSC Chapter 382 382.085(b)
Special Terms and Conditions 1A OP
Description: Failure to conduct monthly pump monitoring on eleven (11) pumps. (CATEGORY C1 violation)
Self Report? NO Classification: Minor
Citation: 30 TAC Chapter 117, SubChapter B 117.340(j)
30 TAC Chapter 122, SubChapter B 122.143(4)
5C THSC Chapter 382 382.085(b)
Special Terms and Conditions 1A OP
Special Terms and Conditions 7B OP
Description: Failure to maintain the run time meter on Unit ID EUTG1111. (CATEGORY C4 violation)
Self Report? NO Classification: Moderate

Citation: 30 TAC Chapter 111, SubChapter B 111.205(c)
30 TAC Chapter 122, SubChapter B 122.143(4)
5C THSC Chapter 382 382.085(b)
Special Terms and Conditions 3Fi OP

Description: Failure to provide fire extinguisher training notifications to the TCEQ and the local pollution control agency (Harris County) from 03/14/2007 through 03/27/2008. (CATEGORY B3 violation)

Self Report? NO **Classification:** Minor

Citation: 30 TAC Chapter 106, SubChapter T 106.454(3)(B)
30 TAC Chapter 115, SubChapter E 115.412(1)(A)
5C THSC Chapter 382 382.085(b)
Special Terms and Conditions 22 OP

Description: Failure to close the lid on the part washer after use. (CATEGORY C4 violation)

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 THSC Chapter 382 382.085(b)
General Terms and Conditions OP

Description: Failure to report all deviations during the deviation reporting period. (CATEGORY C3 violation)

Self Report? NO **Classification:** Moderate

Citation: 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)
Special Terms and Conditions 23 OP

Description: Failure to maintain emissions on Unit ID ZMSENAIS during usage. (CATEGORY B14 violation)

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 FF 61.356(j)(7)
5C THSC Chapter 382 382.085(b)
Special Condition 4B PERMIT
Special Terms and Conditions 1A OP
Special Terms and Conditions 22 OP

Description: Failure to maintain flare pilot flame records. (CATEGORY C3 violation)

Self Report? NO **Classification:** Minor

Citation: 30 TAC Chapter 117, SubChapter B 117.310(c)(1)
30 TAC Chapter 122, SubChapter B 122.143(4)
5C THSC Chapter 382 382.085(b)
Special Terms and Conditions 1A OP

Description: Failure to maintain emissions on Unit ID ZMSENAIS during a quarterly stack test. (CATEGORY C4 violation)

Date: 08/06/2009 (747389) **CN600124705**

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)
Special Condition 11E PERMIT
Special Terms and Conditions 10 OP

Description: Failure to maintain lines resulting in open ended lines. (CATEGORY C10)

Date: 08/11/2009 (747513) **CN600124705**

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 63.163(b)(1)
40 CFR Part 61, Subpart V 61.242-2(a)(1)
5C THSC Chapter 382 382.085(b)
O-02182, SC 1.A PERMIT

Description: failed to perform monthly pump monitoring on 45 pumps in the Benzene/Toluene Unit in February and March of 2008.

Self Report? NO **Classification:** Minor

Citation: 2936, SC 7E PERMIT
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)
O-02182, SC 1.A PERMIT
O-02182, SC 15 PERMIT

Description: failed to equip two open ended lines (OELs) with a cap or valve

Date: 08/18/2009 (747005) CN600124705
Self Report? YES Classification: Moderate

Citation: 30 TAC Chapter 117, SubChapter B 117.340(a)
30 TAC Chapter 122, SubChapter B 122.143(4)
5C THSC Chapter 382 382.085(b)
FOP #O-02179, ST & C #1A PERMIT

Description: Failure to maintain continuous fuel flow records for the Vapor Combustor. (C3)

Date: 08/19/2009 (764588) CN600124705
Self Report? NO Classification: Moderate

Citation: 30 TAC Chapter 111, SubChapter A 111.111(a)(1)(B)
5C THSC Chapter 382 382.085(b)

Description: Equistar failed to prevent the vent filter solenoid from malfunctioning, causing rupture disk (PSE-28098) to release an opacity of 100 (%) percent.

Date: 08/25/2009 (747519) CN600124705
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 THSC Chapter 382 382.085(b)
FOP #O-02184, ST & C#1A OP

Description: failure to perform monthly pump monitoring from February 29, 2008 through March 31, 2008. (Category C1 violation)

Self Report? NO Classification: Minor

Citation: 30 TAC Chapter 115, SubChapter D 115.352(2)
30 TAC Chapter 115, SubChapter H 115.782(b)(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 63.163(c)(1)
5C THSC Chapter 382 382.085(b)
FOP# O-02184, ST & C #18 OP
FOP# O-02184, ST & C #1A OP
NSR Permit No. 2128, SC#8I PA

Description: failed to re-monitor pump seal P-301A in a timely manner. (Category C1 violation)

Self Report? NO Classification: Minor

Citation: 30 TAC Chapter 115, SubChapter D 115.352(2)
30 TAC Chapter 115, SubChapter H 115.782(b)(2)
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)
FOP# O-02184, SC#1A OP
FOP#O-02184, SC#18 OP
NSR 2128, SC#8I PA

Description: failed to calibrate the TVA monitoring instrument. (Category C1 Violation)

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)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.167(a)(1)
5C THSC Chapter 382 382.085(b)
FOP# O-02184, ST & C #18 OP
FOP# O-02184, ST & C #1A OP
NSR Permit No. 2128, SC#8E PA

Description: failed to seal four open-ended lines in VOC service on November 27, 2007 through December 11, 2007, March 27, 2008, and June 4, 2008. (Category C10 violation)

Date: 08/31/2009 (747366)

CN600124705

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 60.482-2(a)(1)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.163(b)(1)
5C THSC Chapter 382 382.085(b)
Special Condition No. 2(C) PERMIT
Special Terms and Conditions No. 1(A) OP
Special Terms and Conditions No. 12 OP

Description: failure to perform monthly pump monitoring. (Category B1 violation)

F. Environmental audits.

Notice of Intent Date: 07/26/2005 (453654)

Disclosure Date: 10/06/2005

Viol. Classification: Moderate

Citation: 30 TAC Chapter 335, SubChapter A 335.6(c)

Description: Failure to update NOR.

Viol. Classification: Moderate

Citation: 30 TAC Chapter 335, SubChapter C 335.69(a)(1)(B)

Description: Failure to classify waste prior to disposal.

Notice of Intent Date: 10/06/2005 (434934)

No DOV Associated

Notice of Intent Date: 11/28/2006 (534269)

No DOV Associated

Notice of Intent Date: 07/30/2007 (593548)

No DOV Associated

Notice of Intent Date: 08/16/2007 (593550)

No DOV Associated

Notice of Intent Date: 08/16/2007 (593554)

No DOV Associated

Notice of Intent Date: 10/02/2007 (595562)

Disclosure Date: 10/25/2007

Viol. Classification: Moderate

Citation: 40 CFR Chapter 61, SubChapter C, PT 61, SubPT FF 61.343
40 CFR Chapter 61, SubChapter C, PT 61, SubPT FF 61.349
40 CFR Chapter 63, SubChapter C, PT 63, SubPT G 63.148
40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.172

Rqmt Prov: PERMIT Operating Permit O-2181

Description: Failed to comply with Method 21 for regulated HON group 1 wastewater closed vent systems.

Viol. Classification: Moderate

Citation: 30 TAC Chapter 115, SubChapter D 115.352
30 TAC Chapter 115, SubChapter H 115.786
40 CFR Chapter 60, SubChapter C, PT 60, SubPT VV 60.482-1
40 CFR Part 60, Subpart VV 60.482-10
40 CFR Part 60, Subpart VV 60.482-4
40 CFR Part 60, Subpart VV 60.482-7

40 CFR Part 60, Subpart VV 60.485
40 CFR Part 60, Subpart VV 60.487
40 CFR Chapter 61, SubChapter C, PT 61, SubPT I 61.112
40 CFR Chapter 61, SubChapter C, PT 61, SubPT V 61.242-1
40 CFR Part 61, Subpart V 61.242-4
40 CFR Part 61, Subpart V 61.242-7
40 CFR Chapter 63, SubChapter C, PT 63, SubPT UU 63.1022
40 CFR Chapter 63, SubChapter C, PT 63, SubPT UU 63.1031
40 CFR Chapter 63, SubChapter C, PT 63, SubPT UU 63.1038
40 CFR Chapter 63, SubChapter C, PT 63, SubPT UU 63.1039
40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.162
40 CFR Part 63, Subpart H 63.174
40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.181
40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.182

Description: Failure to always perform initial and periodic monitoring and there were instances where new or replaced components were not monitored.

Viol. Classification: Moderate

Citation: 40 CFR Chapter 60, SubChapter C, PT 60, SubPT K 60.112
40 CFR Chapter 60, SubChapter C, PT 60, SubPT VV 60.482-1
40 CFR Part 60, Subpart VV 60.482-10
40 CFR Part 60, Subpart VV 60.482-4
40 CFR Part 60, Subpart VV 60.482-7
40 CFR Part 60, Subpart VV 60.485
40 CFR Part 60, Subpart VV 60.487
40 CFR Chapter 61, SubChapter C, PT 61, SubPT V 61.242-1
40 CFR Chapter 61, SubChapter C, PT 61, SubPT V 61.242-11
40 CFR Part 61, Subpart V 61.242-4
40 CFR Part 61, Subpart V 61.242-7
40 CFR Chapter 61, SubChapter C, PT 61, SubPT V 61.245
40 CFR Chapter 61, SubChapter C, PT 61, SubPT V 61.247
40 CFR Chapter 63, SubChapter C, PT 63, SubPT UU 63.1022
40 CFR Chapter 63, SubChapter C, PT 63, SubPT UU 63.1031
40 CFR Chapter 63, SubChapter C, PT 63, SubPT UU 63.1034
40 CFR Chapter 63, SubChapter C, PT 63, SubPT UU 63.1038
40 CFR Chapter 63, SubChapter C, PT 63, SubPT UU 63.1039
40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.162
40 CFR Part 63, Subpart H 63.174
40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.181
40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.182

Description: Failure to complete instances of first repair attempts and final repair attempts within the required timeframes.

Viol. Classification: Moderate

Citation: 40 CFR Chapter 60, SubChapter C, PT 60, SubPT VV 60.482-1
40 CFR Part 60, Subpart VV 60.482-10
40 CFR Part 60, Subpart VV 60.482-4
40 CFR Part 60, Subpart VV 60.482-7
40 CFR Part 60, Subpart VV 60.485
40 CFR Part 60, Subpart VV 60.487
40 CFR Chapter 61, SubChapter C, PT 61, SubPT I 61.112
40 CFR Chapter 61, SubChapter C, PT 61, SubPT V 61.242-1
40 CFR Chapter 61, SubChapter C, PT 61, SubPT V 61.242-11
40 CFR Part 61, Subpart V 61.242-4
40 CFR Part 61, Subpart V 61.242-7
40 CFR Chapter 61, SubChapter C, PT 61, SubPT V 61.245
40 CFR Chapter 61, SubChapter C, PT 61, SubPT V 61.247
40 CFR Chapter 63, SubChapter C, PT 63, SubPT UU 63.1022
40 CFR Chapter 63, SubChapter C, PT 63, SubPT UU 63.1031
40 CFR Chapter 63, SubChapter C, PT 63, SubPT UU 63.1034

40 CFR Chapter 63, SubChapter C, PT 63, SubPT UU 63.1038
40 CFR Chapter 63, SubChapter C, PT 63, SubPT UU 63.1039
40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.162
40 CFR Part 63, Subpart H 63.174
40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.181
40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.182

Description: Failure to properly classify equipment leaks. According to the records reviewed there were instances where equipment leaks were classified as "Repair Delayed" without meeting the applicable Delay of Repair requirements.

Viol. Classification: Moderate

Citation: 30 TAC Chapter 115, SubChapter D 115.352
30 TAC Chapter 115, SubChapter D 115.356
30 TAC Chapter 115, SubChapter H 115.780
40 CFR Chapter 60, SubChapter C, PT 60, SubPT VV 60.482-1
40 CFR Part 60, Subpart VV 60.482-10
40 CFR Part 60, Subpart VV 60.482-4
40 CFR Part 60, Subpart VV 60.482-7
40 CFR Part 60, Subpart VV 60.485
40 CFR Part 60, Subpart VV 60.487
40 CFR Chapter 61, SubChapter C, PT 61, SubPT I 61.112
40 CFR Chapter 61, SubChapter C, PT 61, SubPT V 61.242-1
40 CFR Chapter 61, SubChapter C, PT 61, SubPT V 61.242-11
40 CFR Part 61, Subpart V 61.242-4
40 CFR Part 61, Subpart V 61.242-7
40 CFR Chapter 61, SubChapter C, PT 61, SubPT V 61.245
40 CFR Chapter 61, SubChapter C, PT 61, SubPT V 61.247
40 CFR Chapter 63, SubChapter C, PT 63, SubPT UU 63.1022
40 CFR Chapter 63, SubChapter C, PT 63, SubPT UU 63.1031
40 CFR Chapter 63, SubChapter C, PT 63, SubPT UU 63.1034
40 CFR Chapter 63, SubChapter C, PT 63, SubPT UU 63.1038
40 CFR Chapter 63, SubChapter C, PT 63, SubPT UU 63.1039
40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.162
40 CFR Part 63, Subpart H 63.174
40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.181
40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.182

Description: Failure to identify specific equipment for inclusion in the LDAR program and apply the appropriate regulatory applicability to each component in the LDAR database.

Viol. Classification: Moderate

Citation: 30 TAC Chapter 115, SubChapter D 115.352
30 TAC Chapter 115, SubChapter D 115.356
30 TAC Chapter 115, SubChapter H 115.780
40 CFR Chapter 60, SubChapter C, PT 60, SubPT VV 60.482-1
40 CFR Part 60, Subpart VV 60.482-10
40 CFR Part 60, Subpart VV 60.482-4
40 CFR Part 60, Subpart VV 60.482-7
40 CFR Part 60, Subpart VV 60.485
40 CFR Part 60, Subpart VV 60.487
40 CFR Chapter 61, SubChapter C, PT 61, SubPT I 61.112
40 CFR Chapter 61, SubChapter C, PT 61, SubPT V 61.242-1
40 CFR Chapter 61, SubChapter C, PT 61, SubPT V 61.242-11
40 CFR Part 61, Subpart V 61.242-4
40 CFR Part 61, Subpart V 61.242-7
40 CFR Chapter 61, SubChapter C, PT 61, SubPT V 61.245
40 CFR Chapter 61, SubChapter C, PT 61, SubPT V 61.247
40 CFR Chapter 63, SubChapter C, PT 63, SubPT UU 63.1022
40 CFR Chapter 63, SubChapter C, PT 63, SubPT UU 63.1031
40 CFR Chapter 63, SubChapter C, PT 63, SubPT UU 63.1034
40 CFR Chapter 63, SubChapter C, PT 63, SubPT UU 63.1038

40 CFR Chapter 63, SubChapter C, PT 63, SubPT UU 63.1039
40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.162
40 CFR Part 63, Subpart H 63.174
40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.181

Description: Failure to properly maintain records, specifically: Daily calibration records and LDAR records requiring stream composition data.

Notice of Intent Date: 10/04/2007 (598705)

Disclosure Date: 07/03/2008

Viol. Classification: Minor

Citation: 40 CFR Chapter 136, SubChapter D, PT 136 136.1(b)

Rqmt Prov: PERMIT TPDES0003531

Description: Internal chain-of custodies in the years 2006, 2007 and 2008 were missing required information.

Notice of Intent Date: 10/04/2007 (598710)

Disclosure Date: 07/03/2008

Viol. Classification: Moderate

Rqmt Prov: PERMIT Operating Permit O-2181

Description: Failure to comply with Title V Operating Permit O-2181, Special Condition 31.

Notice of Intent Date: 10/04/2007 (598714)

No DOV Associated

Notice of Intent Date: 04/07/2008 (654966)

No DOV Associated

Notice of Intent Date: 06/18/2008 (688531)

No DOV Associated

Notice of Intent Date: 09/11/2009 (777743)

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

Penalty Calculation Worksheet (PCW)

Policy Revision 2 (September 2002) PCW Revision October 30, 2008

TCEQ

DATES Assigned PCW Screening EPA Due

RESPONDENT/FACILITY INFORMATION

Respondent
 Reg. Ent. Ref. No.
 Facility/Site Region Major/Minor Source

CASE INFORMATION

Enf./Case ID No.	<input type="text" value="38455"/>	No. of Violations	<input type="text" value="5"/>
Docket No.	<input type="text" value="2009-1593-AIR-E"/>	Order Type	<input type="text" value="1660"/>
Media Program(s)	<input type="text" value="Air"/>	Government/Non-Profit	<input type="text" value="No"/>
Multi-Media	<input type="text"/>	Enf. Coordinator	<input type="text" value="John Muennink"/>
		EC's Team	<input type="text" value="Enforcement Team 5"/>

Admin. Penalty \$ Limit Minimum Maximum

Penalty Calculation Section

TOTAL BASE PENALTY (Sum of violation base penalties) Subtotal 1

ADJUSTMENTS (+/-) TO SUBTOTAL 1
 Subtotals 2-7 are obtained by multiplying the Total Base Penalty (Subtotal 1) by the indicated percentage.

Compliance History Enhancement Subtotals 2, 3, & 7

Notes: Penalty enhancement due to 41 NOVs issued for same or similar violations, 29 NOVs issued for unrelated violations, one Agreed Order with a denial of liability, two Agreed Orders without a denial of liability, and two Court Orders with a denial of liability issued for this Plant in the past five years. Penalty reduction due to 12 notice of audit letters and four violation disclosures submitted.

Culpability Enhancement Subtotal 4

Notes: The Respondent does not meet the culpability criteria.

Good Faith Effort to Comply Total Adjustments Subtotal 5

Economic Benefit Enhancement* Subtotal 6
 *Capped at the Total EB \$ Amount

Total EB Amounts	<input type="text" value="\$2,200"/>
Approx. Cost of Compliance	<input type="text" value="\$12,500"/>

SUM OF SUBTOTALS 1-7 Final Subtotal

OTHER FACTORS AS JUSTICE MAY REQUIRE Adjustment
 Reduces or enhances the Final Subtotal by the indicated percentage.

Notes:

Final Penalty Amount

STATUTORY LIMIT ADJUSTMENT Final Assessed Penalty

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

Notes: Deferral offered for expedited settlement.

PAYABLE PENALTY

Screening Date 5-Aug-2009

Docket No. 2009-1593-AIR-E

PCW

Respondent Equistar Chemicals, LP

Policy Revision 2 (September 2002)

Case ID No. 38455

PCW Revision October 30, 2008

Reg. Ent. Reference No. RN100542281

Media [Statute] Air

Enf. Coordinator John Muennink

Compliance History Worksheet

>> Compliance History Site Enhancement (Subtotal 2)

Component	Number of...	Enter Number Here	Adjust.
NOVs	Written NOVs with same or similar violations as those in the current enforcement action (number of NOVs meeting criteria)	41	205%
	Other written NOVs	29	58%
Orders	Any agreed final enforcement orders containing a denial of liability (number of orders meeting criteria)	1	20%
	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	2	50%
Judgments and Consent Decrees	Any non-adjudicated final court judgments or consent decrees containing a denial of liability of this state or the federal government (number of judgments or consent decrees meeting criteria)	2	60%
	Any adjudicated final court judgments and default judgments, or non-adjudicated final court judgments or consent decrees without a denial of liability, of this state or the federal government	0	0%
Convictions	Any criminal convictions of this state or the federal government (number of counts)	0	0%
Emissions	Chronic excessive emissions events (number of events)	0	0%
Audits	Letters notifying the executive director of an intended audit conducted under the Texas Environmental, Health, and Safety Audit Privilege Act, 74th Legislature, 1995 (number of audits for which notices were submitted)	12	-12%
	Disclosures of violations under the Texas Environmental, Health, and Safety Audit Privilege Act, 74th Legislature, 1995 (number of audits for which violations were disclosed)	4	-8%

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) 373%

>> 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 41 NOVs issued for same or similar violations, 29 NOVs issued for unrelated violations, one Agreed Order with a denial of liability, two Agreed Orders without a denial of liability, and two Court Orders with a denial of liability issued for this Plant in the past five years. Penalty reduction due to 12 notice of audit letters and four violation disclosures submitted.

Total Adjustment Percentage (Subtotals 2, 3, & 7) 373%

Screening Date 5-Aug-2009 **Docket No.** 2009-1593-AIR-E **PCW**
Respondent Equistar Chemicals, LP *Policy Revision 2 (September 2002)*
Case ID No. 38455 *PCW Revision October 30, 2008*
Reg. Ent. Reference No. RN100542281
Media [Statute] Air
Enf. Coordinator John Muennink
Violation Number 1
Rule Cite(s) 30 Tex. Admin. Code § 116.115(c), Tex. Health & Safety Code § 382.085(b) and Permit No. 6387, Special Condition No. 3
Violation Description Failed to prevent unauthorized emissions. Specifically, the Respondent released 6,876 lbs of volatile organic compounds ("VOC"), including 3,414 lbs of highly reactive VOCs ("HRVOC"), from Vessel D-1217 in the Methyl Tertiary Butyl Ether Unit during an avoidable emissions event (Incident No. 118631) that began January 8, 2009 and lasted one hour and 30 minutes. The emissions were the result of a liquid filled line being isolated on both ends without proper thermal expansion relief and with used gaskets. Since this emissions event could have been avoided by better operational and maintenance 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

Release	Harm			Percent
	Major	Moderate	Minor	
Actual		X		50%
Potential				

>> Programmatic Matrix

Matrix Notes	Falsification			Percent
	Major	Moderate	Minor	
Human health or the environment in the Houston-Galveston-Brazoria nonattainment area has been exposed to significant amounts of contaminants, including 1.7 tons of HRVOCs, that did not exceed protective levels as a result of the violation.				0%

Adjustment \$5,000

Violation Events

Number of Violation Events 1 Number of violation days 1

mark only one with an x	daily	
	weekly	
	monthly	X
	quarterly	
	semiannual	
	annual	
	single event	

Violation Base Penalty \$5,000

One monthly event is recommended for the event that occurred on January 8, 2009.

Good Faith Efforts to Comply

	0.0% Reduction	\$0
	Before NOV	NOV to EDRP/Settlement Offer
Extraordinary		
Ordinary		
N/A	X (mark with x)	

Notes The Respondent does not meet the good faith criteria for this violation.

Violation Subtotal \$5,000

Economic Benefit (EB) for this violation

Estimated EB Amount \$59

Statutory Limit Test

Violation Final Penalty Total \$23,650

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

Economic Benefit Worksheet

Respondent Equistar Chemicals, LP
Case ID No. 38455
Reg. Ent. Reference No. RN100542281
Media Air
Violation No. 1

Percent Interest 5.0
Years of Depreciation 15

Item Cost **Date Required** **Final Date** **Yrs** **Interest Saved** **Onetime Costs** **EB Amount**
 Item Description No commas or \$

Delayed Costs

Item Description	Item Cost	Date Required	Final Date	Yrs	Interest Saved	Onetime Costs	EB Amount
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)	\$1,000	8-Jan-2009	15-Mar-2010	1.18	\$59	n/a	\$59

Notes for DELAYED costs
 Estimated cost to implement measures designed to ensure that proper thermal expansion relief and new gaskets are in place when isolating liquid filled lines. The date required is the date the event occurred and the final date is the date corrective actions are projected to be completed.

Avoided Costs

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

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

\$59

Screening Date 5-Aug-2009	Docket No. 2009-1593-AIR-E	PCW
Respondent Equistar Chemicals, LP		Policy Revision 2 (September 2002)
Case ID No. 38455		PCW Revision October 30, 2008
Reg. Ent. Reference No. RN100542281		
Media [Statute] Air		
Enf. Coordinator John Muennink		
Violation Number 2		
Rule Cite(s)	30 Tex. Admin. Code §§ 115.722(c)(2) and 116.115(c), Tex. Health & Safety Code § 382.085(b) and Permit No. 1768, Special Condition No. 1	
Violation Description	Failed to prevent unauthorized emissions and exceeded the 1,200 lbs per hour ("lbs/hr") emission limit for HRVOCs. Specifically, the Respondent released 6,133 lbs of VOCs, including 5,611 lbs of HRVOCs, 5,502 lbs of carbon monoxide, and 642 lbs of nitrogen oxide from the OP1 Flare, emission point number ("EPN") 38E01, in the Olefins 1 Unit during an avoidable emissions event (Incident No. 118548) that began January 7, 2009 and lasted three hours and 50 minutes. The emissions were the result of the plugging of a tube in the compressor and a subsequent loss of steam that caused the compressor to shutdown and the OP1 Flare to vent. Since this event could have been avoided by better maintenance and operational practices and was improperly reported, 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	Potential		Percent
	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="text" value="50%"/>

>> Programmatic Matrix

	Major	Moderate	Minor	
Falsification	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Percent
	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="text" value="0%"/>

Matrix Notes Human health or the environment in the Houston-Galveston-Brazoria non-attainment area has been exposed to significant amounts of contaminants, including 2.81 tons of highly reactive VOCs, that did not exceed protective levels as a result of the violation.

Adjustment

\$5,000

Violation Events

Number of Violation Events Number of violation days

mark only one with an x	daily	<input type="checkbox"/>
	weekly	<input type="checkbox"/>
	monthly	<input checked="" type="checkbox"/>
	quarterly	<input type="checkbox"/>
	semiannual	<input type="checkbox"/>
	annual	<input type="checkbox"/>
	single event	<input type="checkbox"/>

Violation Base Penalty

One monthly event is recommended based upon the violation that occurred on January 7, 2009.

Good Faith Efforts to Comply

	0.0% Reduction	
	Before NOV	NOV to EOPRP/Settlement Offer
Extraordinary	<input type="checkbox"/>	<input type="checkbox"/>
Ordinary	<input type="checkbox"/>	<input type="checkbox"/>
N/A	<input checked="" type="checkbox"/>	(mark with x)

Notes The Respondent does not meet the good faith criteria for this violation.

Violation Subtotal

Economic Benefit (EB) for this violation

Estimated EB Amount

Statutory Limit Test

Violation Final Penalty Total

This violation Final Assessed Penalty (adjusted for limits)

Economic Benefit Worksheet

Respondent Equistar Chemicals, LP
Case ID No. 38455
Reg. Ent. Reference No. RN100542281
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
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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)	\$1,500	7-Jan-2009	15-Mar-2010	1.18	\$89	n/a	\$89

Notes for DELAYED costs

Estimated cost to implement measures designed to prevent tubes in the compressor from plugging when changing filters. The date required is the date of the event and the final date is the date corrective actions are projected to be 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

\$1,500

TOTAL

\$89

Screening Date 5-Aug-2009	Docket No. 2009-1593-AIR-E	PCW		
Respondent Equistar Chemicals, LP	<small>Policy Revision 2 (September 2002)</small>			
Case ID No. 38455	<small>PCW Revision October 30, 2008</small>			
Reg. Ent. Reference No. RN100542281				
Media [Statute] Air				
Enf. Coordinator John Muennink				
Violation Number 3				
Rule Cite(s)	30 Tex. Admin. Code § 101.201(b)(1)(H) and Tex. Health & Safety Code § 382.085(b)			
Violation Description	Failed to report the estimated total quantities for the compounds released during Incident No. 118546 in the final emissions event report. Specifically, the Respondent reported only the amount of contaminants that were over the permitted limit, instead of the total amount of contaminants emitted.			
Base Penalty		\$10,000		
>> Environmental, Property and Human Health Matrix				
OR	Harm			Percent
	Major	Moderate	Minor	
Actual	<input type="text"/>	<input type="text"/>	<input type="text"/>	0%
Potential	<input type="text"/>	<input type="text"/>	<input type="text"/>	
>> Programmatic Matrix				
Falsification			Percent	
Major	Moderate	Minor		
<input type="text"/>	<input type="text"/>	x	1%	
Matrix Notes	Most (at least 70%) of the rule requirements were met.			
Adjustment		\$9,900		
		\$100		
Violation Events				
Number of Violation Events		1	Number of violation days	
		132		
<small>mark only one with an x</small>	daily	<input type="text"/>	Violation Base Penalty	
	weekly	<input type="text"/>		
	monthly	<input type="text"/>		
	quarterly	<input type="text"/>		
	semiannual	<input type="text"/>		
	annual	<input type="text"/>		
	single event	x		\$100
One single event is recommended based upon the one inaccurate report.				
Good Faith Efforts to Comply				
		0.0% Reduction	\$0	
		<small>Before NOV NOV to EDPRP/Settlement Offer</small>		
Extraordinary	<input type="text"/>	<input type="text"/>		
Ordinary	<input type="text"/>	<input type="text"/>		
N/A	x	<small>(mark with x)</small>		
Notes	The Respondent does not meet the good faith criteria for this violation.			
Violation Subtotal		\$100		
Economic Benefit (EB) for this violation		Statutory Limit Test		
Estimated EB Amount		Violation Final Penalty Total		
\$57		\$473		
This violation Final Assessed Penalty (adjusted for limits) \$473				

Economic Benefit Worksheet

Respondent Equistar Chemicals, LP
Case ID No. 38455
Reg. Ent. Reference No. RN100542281
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
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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)	\$1,000	21-Jan-2009	16-Mar-2010	1.15	\$57	n/a	\$57

Notes for DELAYED costs

Estimated cost to implement measures designed to ensure that emissions events are properly reported. The date required is the date that the complete and accurate final emissions event report was due and the final date is the date corrective actions are projected to be 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

\$57

<p>Screening Date 5-Aug-2009</p> <p>Respondent Equistar Chemicals, LP</p> <p>Case ID No. 38455</p> <p>Reg. Ent. Reference No. RN100542251</p> <p>Media [Statute] Air</p> <p>Enf. Coordinator John Muennink</p> <p>Violation Number <input type="text" value="4"/></p> <p>Rule Cite(s)</p>	<p>Docket No. 2009-1593-AIR-E</p> <p style="text-align: right;">PCW</p> <p style="text-align: right; font-size: small;">Policy Revision 2 (September 2002) PCW Revision October 30, 2008</p>																																																		
<p>Violation Description</p> <div style="border: 1px solid black; padding: 5px;"> <p>30 Tex. Admin. Code §§ 116.115(c) and 122.143(4), Tex. Health & Safety Code § 382.085(b), Federal Operating Permit ("FOP") No. O-02184, Special Condition No. 18 and Permit No. 2128, Special Condition No. 1</p> <p>Failed to comply with the hourly emission limits of 1.65 lbs/hr for VOCs and 0.14 lbs/hr of 1,3 butadiene intermittently from December 11, 2005 to present. Specifically, emissions from Regeneration Vent, EPN 3E05, for Reactors R-309 A, R-309 B, and R-309 C, exceeded permitted limits as documented by the results of sampling conducted for six one-hour samples per reactor on December 11 through 12, 2005 and December 31, 2005 and an update provided on May 26, 2009 that emission exceedances are ongoing. Rates ranged from 1.76 lbs/hr to 9.28 lbs/hr of VOCs over 35 hours and 0.16 lbs/hr to 0.31 lbs/hr of 1,3 butadiene over 27 hours and total emissions through May 26, 2009 were reported to be 7,236 lbs of VOC and 64.7 lbs of 1,3 butadiene.</p> </div>																																																			
<p>Base Penalty <input style="width: 100px;" type="text" value="\$10,000"/></p>																																																			
<p>>> Environmental, Property and Human Health Matrix</p> <table style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 10%;"></td> <td style="width: 10%;"></td> <td colspan="3" style="text-align: center; font-weight: bold;">Harm</td> <td style="width: 10%;"></td> </tr> <tr> <td></td> <td style="text-align: center;">Release</td> <td style="text-align: center;">Major</td> <td style="text-align: center;">Moderate</td> <td style="text-align: center;">Minor</td> <td></td> </tr> <tr> <td style="text-align: center; vertical-align: middle;">OR</td> <td style="text-align: center;">Actual</td> <td style="border: 1px solid black; width: 50px; height: 20px;"></td> <td style="border: 1px solid black; width: 50px; height: 20px;"></td> <td style="border: 1px solid black; width: 50px; height: 20px; text-align: center;">x</td> <td style="text-align: center; vertical-align: middle;">Percent <input style="width: 50px;" type="text" value="25%"/></td> </tr> <tr> <td></td> <td style="text-align: center;">Potential</td> <td style="border: 1px solid black; width: 50px; height: 20px;"></td> <td style="border: 1px solid black; width: 50px; height: 20px;"></td> <td style="border: 1px solid black; width: 50px; height: 20px;"></td> <td></td> </tr> </table>				Harm					Release	Major	Moderate	Minor		OR	Actual			x	Percent <input style="width: 50px;" type="text" value="25%"/>		Potential																														
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<p>Matrix Notes</p>	<p>Human health or the environment in the Houston-Galveston-Brazoria nonattainment area has been exposed to insignificant amounts of contaminants that did not exceed protective levels as a result of the violation.</p>					<p>Adjustment <input style="width: 100px;" type="text" value="\$7,500"/></p>																																													
						<p><input style="width: 100px;" type="text" value="\$2,500"/></p>																																													
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<p>Violation Subtotal <input style="width: 100px;" type="text" value="\$7,500"/></p>																																																			
<p>Economic Benefit (EB) for this violation</p> <p>Estimated EB Amount <input style="width: 100px;" type="text" value="\$1,638"/></p>			<p>Statutory Limit Test</p> <p>Violation Final Penalty Total <input style="width: 100px;" type="text" value="\$35,475"/></p>																																																
<p>This violation Final Assessed Penalty (adjusted for limits) <input style="width: 100px;" type="text" value="\$35,475"/></p>																																																			

Economic Benefit Worksheet

Respondent Equistar Chemicals, LP
Case ID No. 38455
Reg. Ent. Reference No. RN100542281
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				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	\$2,000	11-Dec-2005	15-Aug-2010	4.88	\$468	n/a	\$468
Other (as needed)	\$5,000	11-Dec-2005	15-Aug-2010	4.88	\$1,170	n/a	\$1,170

Notes for DELAYED costs
 Estimated cost to install a thermal oxidizer to minimize emissions (\$5,000) and to obtain an amended permit (\$2,000). The date required is the date unauthorized emissions were first documented and the final date is the date corrective actions are projected to be 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 \$1,638

Screening Date 6-Aug-2009 **Docket No.** 2009-1593-AIR-E **PCW**
Respondent Equistar Chemicals, LP *Policy Revision 2 (September 2002)*
Case ID No. 38455 *PCW Revision October 30, 2008*
Reg. Ent. Reference No. RN100542281
Media [Statute] Air
Enf. Coordinator John Muennink
Violation Number 5
Rule Cite(s) 30 Tex. Admin. Code § 122.143(4), 40 Federal Code of Regulations § 63.119(b)(6), Tex. Health & Safety Code § 382.085(b) and FOP No. O-02182, Special Condition No. 1.A.
Violation Description Failed to equip the gauge float wells with bolts or fasteners on the covers of the roof openings of Tanks 3111A, 3111B, and 3113, to ensure that the openings are air tight.
Base Penalty \$10,000

>> Environmental, Property and Human Health Matrix

OR	Release	Harm			Percent
		Major	Moderate	Minor	
Actual				X	25%
Potential					

>> Programmatic Matrix

	Falsification	Major	Moderate	Minor	Percent
					0%

Matrix Notes

Human health or the environment in the Houston-Galveston-Brazoria nonattainment area has been exposed to insignificant amounts of contaminants that did not exceed protective levels as a result of the violation.

Adjustment \$7,500

\$2,500

Violation Events

Number of Violation Events 3 1081 Number of violation days

mark only one with an x	daily	
	weekly	
	monthly	
	quarterly	X
	semiannual	
	annual	
	single event	

Violation Base Penalty \$7,500

Twelve quarterly events are recommended for the duration of the violation; however, due to the bankruptcy petition filed on January 6, 2009, penalties can only be collected from that date to the screening date of August 5, 2009, which is equal to three quarters.

Good Faith Efforts to Comply

	0.0% Reduction	\$0
	Before NOV	NOV to EDRP/Settlement Offer
Extraordinary		
Ordinary		
N/A	X (mark with x)	

Notes

The Respondent does not meet the good faith criteria for this violation.

Violation Subtotal \$7,500

Economic Benefit (EB) for this violation

Estimated EB Amount \$357

Statutory Limit Test

Violation Final Penalty Total \$35,475

This violation Final Assessed Penalty (adjusted for limits) \$35,475

Economic Benefit Worksheet

Respondent Equistar Chemicals, LP
Case ID No. 38455
Reg. Ent. Reference No. RN100542281
Media Air
Violation No. 5

Percent Interest 5.0
Years of Depreciation 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)	\$2,000	20-Aug-2006	15-Mar-2010	3.57	\$357	n/a	\$357

Notes for DELAYED costs

Estimated cost to install bolts or fasteners on the covers of Tanks 3111A, 3111B, and 3113. The date required is the date the equipment was documented to be missing and the final date is the projected compliance date.

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

\$357

Compliance History Report

Customer/Respondent/Owner-Operator: CN600124705 Equistar Chemicals, LP Classification: AVERAGE Rating: 3.00
Regulated Entity: RN100542281 CHANNELVIEW COMPLEX Classification: AVERAGE Site Rating: 4.28

ID Number(s):		ACCOUNT NUMBER	
	AIR OPERATING PERMITS		HG0033B
	AIR OPERATING PERMITS	PERMIT	1426
	AIR OPERATING PERMITS	PERMIT	2174
	AIR OPERATING PERMITS	PERMIT	2175
	AIR OPERATING PERMITS	PERMIT	2176
	AIR OPERATING PERMITS	PERMIT	2177
	AIR OPERATING PERMITS	PERMIT	2178
	AIR OPERATING PERMITS	PERMIT	2179
	AIR OPERATING PERMITS	PERMIT	2180
	AIR OPERATING PERMITS	PERMIT	2181
	AIR OPERATING PERMITS	PERMIT	2182
	AIR OPERATING PERMITS	PERMIT	2183
	AIR OPERATING PERMITS	PERMIT	2184
	AIR OPERATING PERMITS	PERMIT	2185
	WASTEWATER	PERMIT	WQ0000391000
	WASTEWATER	PERMIT	TPDES0003531
	WASTEWATER	PERMIT	TX0003531
	AIR NEW SOURCE PERMITS	PERMIT	1768
	AIR NEW SOURCE PERMITS	PERMIT	2128
	AIR NEW SOURCE PERMITS	PERMIT	2933
	AIR NEW SOURCE PERMITS	PERMIT	2936
	AIR NEW SOURCE PERMITS	PERMIT	3130A
	AIR NEW SOURCE PERMITS	PERMIT	3294
	AIR NEW SOURCE PERMITS	PERMIT	3627
	AIR NEW SOURCE PERMITS	PERMIT	6245
	AIR NEW SOURCE PERMITS	PERMIT	6387
	AIR NEW SOURCE PERMITS	PERMIT	8125
	AIR NEW SOURCE PERMITS	PERMIT	10586
	AIR NEW SOURCE PERMITS	PERMIT	10700
	AIR NEW SOURCE PERMITS	PERMIT	10812
	AIR NEW SOURCE PERMITS	PERMIT	11735
	AIR NEW SOURCE PERMITS	PERMIT	12334
	AIR NEW SOURCE PERMITS	PERMIT	13849
	AIR NEW SOURCE PERMITS	PERMIT	15348

AIR NEW SOURCE PERMITS	PERMIT	12341
AIR NEW SOURCE PERMITS	PERMIT	22779
AIR NEW SOURCE PERMITS	PERMIT	23079
AIR NEW SOURCE PERMITS	PERMIT	24677
AIR NEW SOURCE PERMITS	PERMIT	24887
AIR NEW SOURCE PERMITS	PERMIT	30868
AIR NEW SOURCE PERMITS	PERMIT	32324
AIR NEW SOURCE PERMITS	PERMIT	32136
AIR NEW SOURCE PERMITS	PERMIT	32629
AIR NEW SOURCE PERMITS	PERMIT	33899
AIR NEW SOURCE PERMITS	PERMIT	34897
AIR NEW SOURCE PERMITS	PERMIT	42948
AIR NEW SOURCE PERMITS	PERMIT	47487
AIR NEW SOURCE PERMITS	PERMIT	50141
AIR NEW SOURCE PERMITS	PERMIT	50142
AIR NEW SOURCE PERMITS	PERMIT	50165
AIR NEW SOURCE PERMITS	ACCOUNT NUMBER	HG0033B
AIR NEW SOURCE PERMITS	PERMIT	52720
AIR NEW SOURCE PERMITS	PERMIT	54098
AIR NEW SOURCE PERMITS	REGISTRATION	88680
AIR NEW SOURCE PERMITS	REGISTRATION	76017
AIR NEW SOURCE PERMITS	REGISTRATION	75881
AIR NEW SOURCE PERMITS	REGISTRATION	76313
AIR NEW SOURCE PERMITS	REGISTRATION	76277
AIR NEW SOURCE PERMITS	AFS NUM	4820100075
AIR NEW SOURCE PERMITS	PERMIT	49120
AIR NEW SOURCE PERMITS	PERMIT	49130
AIR NEW SOURCE PERMITS	REGISTRATION	74110
AIR NEW SOURCE PERMITS	REGISTRATION	73859
AIR NEW SOURCE PERMITS	REGISTRATION	72948
AIR NEW SOURCE PERMITS	REGISTRATION	72946
AIR NEW SOURCE PERMITS	REGISTRATION	74051
AIR NEW SOURCE PERMITS	REGISTRATION	74563
AIR NEW SOURCE PERMITS	REGISTRATION	74181
AIR NEW SOURCE PERMITS	REGISTRATION	74944
AIR NEW SOURCE PERMITS	REGISTRATION	74949
AIR NEW SOURCE PERMITS	REGISTRATION	75322
AIR NEW SOURCE PERMITS	REGISTRATION	76778
AIR NEW SOURCE PERMITS	REGISTRATION	76791

AIR NEW SOURCE PERMITS	REGISTRATION	76651
AIR NEW SOURCE PERMITS	REGISTRATION	77318
AIR NEW SOURCE PERMITS	REGISTRATION	77619
AIR NEW SOURCE PERMITS	REGISTRATION	77640
AIR NEW SOURCE PERMITS	REGISTRATION	76693
AIR NEW SOURCE PERMITS	REGISTRATION	78024
AIR NEW SOURCE PERMITS	REGISTRATION	78069
AIR NEW SOURCE PERMITS	REGISTRATION	78128
AIR NEW SOURCE PERMITS	REGISTRATION	78108
AIR NEW SOURCE PERMITS	REGISTRATION	77631
AIR NEW SOURCE PERMITS	REGISTRATION	78278
AIR NEW SOURCE PERMITS	REGISTRATION	78343
AIR NEW SOURCE PERMITS	REGISTRATION	78191
AIR NEW SOURCE PERMITS	REGISTRATION	78252
AIR NEW SOURCE PERMITS	REGISTRATION	78560
AIR NEW SOURCE PERMITS	REGISTRATION	78173
AIR NEW SOURCE PERMITS	REGISTRATION	78197
AIR NEW SOURCE PERMITS	REGISTRATION	78772
AIR NEW SOURCE PERMITS	REGISTRATION	78381
AIR NEW SOURCE PERMITS	REGISTRATION	78819
AIR NEW SOURCE PERMITS	REGISTRATION	79261
AIR NEW SOURCE PERMITS	REGISTRATION	79431
AIR NEW SOURCE PERMITS	REGISTRATION	79460
AIR NEW SOURCE PERMITS	REGISTRATION	78599
AIR NEW SOURCE PERMITS	REGISTRATION	78978
AIR NEW SOURCE PERMITS	REGISTRATION	80296
AIR NEW SOURCE PERMITS	REGISTRATION	80137
AIR NEW SOURCE PERMITS	REGISTRATION	80914
AIR NEW SOURCE PERMITS	REGISTRATION	80689
AIR NEW SOURCE PERMITS	REGISTRATION	80597
AIR NEW SOURCE PERMITS	REGISTRATION	81543
AIR NEW SOURCE PERMITS	REGISTRATION	81190
AIR NEW SOURCE PERMITS	REGISTRATION	81189
AIR NEW SOURCE PERMITS	REGISTRATION	81759
AIR NEW SOURCE PERMITS	REGISTRATION	81636
AIR NEW SOURCE PERMITS	REGISTRATION	81630
AIR NEW SOURCE PERMITS	REGISTRATION	82226
AIR NEW SOURCE PERMITS	REGISTRATION	81716

AIR NEW SOURCE PERMITS	REGISTRATION	81930
AIR NEW SOURCE PERMITS	REGISTRATION	82538
AIR NEW SOURCE PERMITS	REGISTRATION	85128
AIR NEW SOURCE PERMITS	REGISTRATION	84818
AIR NEW SOURCE PERMITS	REGISTRATION	85442
AIR NEW SOURCE PERMITS	REGISTRATION	87006
AIR NEW SOURCE PERMITS	REGISTRATION	85303
AIR NEW SOURCE PERMITS	REGISTRATION	84079
AIR NEW SOURCE PERMITS	REGISTRATION	84091
AIR NEW SOURCE PERMITS	PERMIT	83799
AIR NEW SOURCE PERMITS	REGISTRATION	84183
AIR NEW SOURCE PERMITS	REGISTRATION	84715
AIR NEW SOURCE PERMITS	REGISTRATION	84149
AIR NEW SOURCE PERMITS	REGISTRATION	84502
AIR NEW SOURCE PERMITS	REGISTRATION	84076
AIR NEW SOURCE PERMITS	REGISTRATION	84651
AIR NEW SOURCE PERMITS	REGISTRATION	84381
AIR NEW SOURCE PERMITS	REGISTRATION	85308
AIR NEW SOURCE PERMITS	REGISTRATION	84541
AIR NEW SOURCE PERMITS	REGISTRATION	88142
INDUSTRIAL AND HAZARDOUS WASTE GENERATION	EPA ID	TXD058275769
INDUSTRIAL AND HAZARDOUS WASTE GENERATION	SOLID WASTE REGISTRATION # (SWR)	30030
INDUSTRIAL AND HAZARDOUS WASTE STORAGE	PERMIT	50117
INDUSTRIAL AND HAZARDOUS WASTE STORAGE	PERMIT	50117
UNDERGROUND INJECTION CONTROL	PERMIT	WDW036
PUBLIC WATER SYSTEM/SUPPLY	REGISTRATION	1011578
WATER LICENSING	LICENSE	1011578
IHW CORRECTIVE ACTION	SOLID WASTE REGISTRATION # (SWR)	30030

Location: 8280 SHELDON RD BLDG 1, CHANNELVIEW, TX, 77530

TCEQ Region: REGION 12 - HOUSTON

Date Compliance History Prepared: July 22, 2009

Agency Decision Requiring Compliance History: Enforcement

Compliance Period: July 22, 2004 to July 22, 2009

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

Name: Trina Grleco Phone: (210) 403-4006

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/operator of the site during the compliance period? No
3. If Yes, who is the current owner/operator? N/A
4. If Yes, who was/were the prior owner(s)/operator(s) ? N/A
5. When did the change(s) in owner or operator occur? N/A
6. Rating Date: 9/1/2008 Repeat Violator: NO

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: 12/02/2006

ADMINORDER 2006-0515-AIR-E

Classification: Moderate

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

Rqmt Prov: S.C. 1 PERMIT

Description: Failure to prevent the release of unauthorized emissions from an aboveground storage tank pressure safety valve.

Effective Date: 05/22/2008

ADMINORDER 2007-1230-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: Permit # 2128 SC 1 PA

Description: As evidenced by Findings of Fact No. 3, Equistar failed to prevent unauthorized emissions during an April 4, 2007 emissions event, in violation of Air Permit No. 2128, Special Condition No. 1, 30 TEX. ADMIN. CODE § 116.115(c), and TEX. HEALTH & SAFETY CODE § 382.085(b). Since these emissions were avoidable, the demonstrations in 30 TEX. ADMIN. CODE § 101.222 necessary to present an affirmative defense were not met.

Classification: Moderate

Citation: 30 TAC Chapter 115, SubChapter H 115.722(c)(1)

30 TAC Chapter 116, SubChapter B 116.115(c)

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

Rqmt Prov: TCEQ Air Permit #2933, SC#1 PA

Description: As evidenced by Findings of Fact No. 4, Equistar failed to prevent unauthorized emissions during a January 8, 2007 emissions event, in violation of Air Permit No. 2933, Special Condition No. 1, 30 TEX. ADMIN. CODE §§ 115.722(c)(1) and 116.115(c), and TEX. HEALTH & SAFETY CODE § 382.085(b). Since these emissions were unauthorized, the demonstrations in 30 TEX. ADMIN. CODE § 101.222 necessary to present an affirmative defense were not met.

Effective Date: 06/19/2008

ADMINORDER 2007-0493-AIR-E

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: FOP O-02177 SC 10 OP

FOP O-02177 SC 1A OP

NSR 22779 SC 8(E) PA

Description: Failed to cap 4 open-ended lines.

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: FOP O-02177 SC 10 OP

FOP O-02177 SC 1A OP

NSR 22779 SC 6(A) PA

Description: Failed to operate flare within required heat input of 300 Btu/scf.

Classification: Minor

Citation: 30 TAC Chapter 115, SubChapter H 115.726(d)(3)
30 TAC Chapter 122, SubChapter B 122.143(4)
5C THC Chapter 382, SubChapter D 382.085(b)

Rqmt Prov: FOP O-02177 SC 1.J(ii) OP

Description: Failed to report corrective actions within the required time frame.

Classification: Moderate

Citation: 30 TAC Chapter 115, SubChapter H 115.725(d)(2)
30 TAC Chapter 122, SubChapter B 122.143(4)
5C THC Chapter 382, SubChapter D 382.085(b)

Rqmt Prov: FOP O-02177 SC 1.J(ii) OP

Description: Failed to calibrate the Poly Butadiene unit flare analyzer.

Classification: Minor

Citation: 30 TAC Chapter 122, SubChapter B 122.121
5C THC Chapter 382, SubChapter D 382.085(b)
5C THSC Chapter 382 382.054

Description: Failed to obtain authorization for emissions sources and their associated emissions prior to operation.

Classification: Moderate

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

Rqmt Prov: FOP O-02177 SC 10 OP

NSR 49120 SC 1 PA

Description: Failed to comply with permitted emissions limits.

Classification: Moderate

Citation: 30 TAC Chapter 115, SubChapter B 115.136(a)(1)
30 TAC Chapter 122, SubChapter B 122.143(4)
5C THC Chapter 382, SubChapter D 382.085(b)

Rqmt Prov: FOP O-02177 SC 1A OP

Description: Failed to maintain sufficient records to demonstrate continuous compliance with VOC water separator exemption criteria.

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: FOP O-02177 SC 10 OP

FOP O-02177 SC 1A OP

NSR 22779 SC 8(l) PA

Description: The Respondent failed to repair a leaking valve during a scheduled shutdown.

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 63.127(b)(2)
5C THC Chapter 382, SubChapter D 382.085(b)

Rqmt Prov: FOP O-02181 SC 1A OP

Description: Failed to use a continuous monitoring recorder on the Methanol Skid (ECULR2MEOH).

Classification: Moderate

Citation: 30 TAC Chapter 115, SubChapter C 115.244
30 TAC Chapter 122, SubChapter B 122.143(4)
5C THC Chapter 382, SubChapter D 382.085(b)

Rqmt Prov: FOP O-02181 SC 6C(lv) OP

Description: Failed to perform daily inspections of the fuel dispensing facilities.

Classification: Moderate

Citation: 30 TAC Chapter 115, SubChapter C 115.212(a)(3)(A)(ii)
30 TAC Chapter 122, SubChapter B 122.143(4)
5C THC Chapter 382, SubChapter D 382.085(b)

Rqmt Prov: FOP O-02181 SC 6B(ii) OP

FOP O-02181 SC1A OP

Description: Failed to provide proper emissions control for waste material.

Classification: Moderate

Citation: 30 TAC Chapter 117, SubChapter B 117.206(l)

30 TAC Chapter 122, SubChapter B 122.143(4)
5C THC Chapter 382, SubChapter D 382.085(b)
Rqmt Prov: FOP O-02181 SC 7A OP
FOP O-02181 SC1A OP
Description: Failed to comply with restrictions on engine operating hours in an ozone nonattainment area.
Classification: Minor
Citation: 30 TAC Chapter 117, SubChapter B 117.219(f)(10)
30 TAC Chapter 122, SubChapter B 122.143(4)
5C THC Chapter 382, SubChapter D 382.085(b)
Rqmt Prov: FOP O-02181 SC 1A OP
FOP O-02181 SC 7E OP
Description: Failure to record the start and stop times of diesel pump.
Classification: Moderate
Citation: 30 TAC Chapter 115, SubChapter B 115.144(4)(A)
5C THC Chapter 382, SubChapter D 382.085(b)
Rqmt Prov: FOP O-02181 SC 1A OP
Description: Failed to demonstrate VOC reduction efficiency for the ECUABEAST bio-treatment unit.
Classification: Moderate
Citation: 30 TAC Chapter 115, SubChapter H 115.725(d)(1)
5C THC Chapter 382, SubChapter D 382.085(b)
Description: Failed to timely conduct flare analyzer calibrations.
Classification: Moderate
Citation: 30 TAC Chapter 101, SubChapter A 101.20(2)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT A 63.10(d)(5)(i)
5C THC Chapter 382, SubChapter D 382.085(b)
Description: Failed to comply with the requirements of malfunction reporting for the wastewater steam stripper (EUTT8802).
Classification: Moderate
Citation: 30 TAC Chapter 101, SubChapter A 101.20(1)
30 TAC Chapter 101, SubChapter A 101.20(2)
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 63, SubChapter C, PT 63, SubPT H 63.167(a)(1)
5C THC Chapter 382, SubChapter D 382.085(b)
Rqmt Prov: FOP O-02181 SC 1A OP
FOP O-02181 SC 22 OP
NSR 2128 SC 8(E) PA
Description: Failed to equip open ended lines with a cap, blind flange, plug, or a second valve.
Classification: Minor
Citation: 30 TAC Chapter 122, SubChapter B 122.132(a)
5C THC Chapter 382, SubChapter D 382.085(b)
Rqmt Prov: General Terms and Conditions OP
Description: Failed to include PBR claims in a FOP.
Classification: Moderate
Citation: 30 TAC Chapter 115, SubChapter B 115.112(a)(3)
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: FOP O-02178 SC 10 OP
FOP O-02178 SC 1A OP
NSR 24677 SC 1 PA
Description: Exceeded permitted emissions limits from tank TK-2810.
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: FOP O-02178 SC 10 OP
NSR 24677 SC 11F PA
NSR 24677 SC 13 PA
Description: Failed to install rupture disc and pressure gauges on three safety relief valves (EPM

F28E00) in the Styrene Maleic Anhydride unit.

Classification: Moderate

Citation: 30 TAC Chapter 116, SubChapter B 116.116(b)(1)
30 TAC Chapter 122, SubChapter B 122.143(4)
5C THC Chapter 382, SubChapter D 382.085(b)

Rqmt Prov: STC 10 OP

Description: Failed to accurately represent operating temperatures for tote EPN 28E37 in the permit representations.

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: FOP -02178 SC 10 OP
NSR 24677 SC 9C PA

Description: Failed to perform closed loop cumene sampling.

Classification: Minor

Citation: 30 TAC Chapter 117, SubChapter B 117.213(a)
30 TAC Chapter 122, SubChapter B 122.143(4)
5C THC Chapter 382, SubChapter D 382.085(b)

Rqmt Prov: FOP O-02178 SC 1A OP

Description: Failed to maintain continuous records of fuel flow for Heater MSMHT2801B.

Classification: Minor

Citation: 30 TAC Chapter 111, SubChapter A 111.111(a)(1)(B)
30 TAC Chapter 122, SubChapter B 122.143(4)
5C THC Chapter 382, SubChapter D 382.085(b)

Rqmt Prov: FOP O-02178 SC 3 OP

Description: Failed to prevent visible emissions from Dust Collector EPN28E29.

Effective Date: 10/01/2008

COURTORDER

Classification: Moderate

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

Description: Failure to control emissions from cooling towers OP1, OP2, and East Plant under MAERT limits.

Classification: Moderate

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

Description: Failure to properly define for cooling towers OP1 and OP2, VOC in the exhaust air from the air stripping system (either ppmv or lb/VOC/gal) at which a leak into cooling water will be assumed.

Classification: Moderate

Citation: 30 TAC Chapter 101, SubChapter A 101.6(a)(1)(A)

Description: Failure to report upset emissions of benzene from cooling towers.

Classification: Major

Citation: 30 TAC Chapter 335, SubChapter A 335.2
30 TAC Chapter 335, SubChapter B 335.43

Description: Unauthorized discharges into the East basin were noted

Classification: Moderate

Citation: 5C THC Chapter 382, SubChapter A 382.085(a)

Description: Failed to prevent unauthorized emissions of 4,380 pounds (lbs) of unspecified volatile organic compounds (VOCs), 1,511 lbs of butadiene, and 1,095 lbs of butene during an emissions event on September 1, 2003 that lasted three minutes.

Classification: Major

Citation: 30 TAC Chapter 101, SubChapter F 101.201(b)(7)
5C THC Chapter 382, SubChapter A 382.085(b)

Description: Failed to report all individually listed compounds or mixtures of air contaminants in an emissions event notification. Specifically, VOCs were not specified.

Classification: Moderate

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

Description: Failed to prevent the unauthorized release of 173 pounds (lbs) of volatile organic compounds (VOCs), including 30 lbs of Highly Reactive VOCs from the Condensate Pot (D-3655) during an emissions event that began on April 21, 2004 and lasted for 170 hours and 45 minutes.

Classification: Moderate

Citation: 30 TAC Chapter 101, SubChapter F 101.201(a)(2)(D)

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

Description: Failed to properly notify the TCEQ of an emissions event that began on July 14, 2004. Specifically, Equistar failed to identify the common name of the facility which incurred the emissions event in the Initial Notification.

Classification: Moderate

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

Rqmt Prov: General Condition No. 8 PERMIT

Description: Failed to comply with permitted emission limits during an emissions event that began on July 14, 2004 and lasted for three hours and 30 minutes.

Classification: Moderate

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

Description: Failed to prevent the unauthorized release of 6,100 pounds of propylene from the Propylene Product Drum (D-4687) during an emissions event that began on June 23, 2004 and lasted for two hours.

Classification: Moderate

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

Description: Failed to prevent the unauthorized release of 340 lbs of propylene and 17 lbs of propane from a pressure relief valve in Exchanger E-36232 during an emissions event that began on July 14, 2004 and lasted for 3,057 hours.

Classification: Moderate

Citation: 30 TAC Chapter 101, SubChapter F 101.201(a)(2)(G)
30 TAC Chapter 101, SubChapter F 101.201(b)(7)
5C THC Chapter 382, SubChapter A 382.085(b)

Description: Failed to properly notify the TCEQ of an emissions event that began on July 22, 2004. Specifically, Equistar failed to speculate VOCs in the Initial Notification and Final Report.

Classification: Moderate

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

Rqmt Prov: Permit No. 1768, General Condition No. 8 PERMIT
Permit No. 2938, Special Condition No. 1 PERMIT

Description: Failed to comply with permitted emission limits during an emissions event that began on July 22, 2004 and lasted for 200 hours.

Classification: Moderate

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

Rqmt Prov: TCEQ Air Permit No. 2128, GC No. 8 PERMIT

Description: Failed to prevent a unauthorized emissions of 990 pounds ("lbs") of 1,3 butadiene during an avoidable emissions event that occurred on November 23, 2004 and lasted three minutes.

Classification: Moderate

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

Rqmt Prov: TCEQ Permit #1768, GC #8 PERMIT

Description: Failed to prevent unauthorized emissions of 119.35 pounds (lbs) of benzene and 154.69 lbs of volatile organic compounds during an emissions event that occurred on April 1, 2005 and lasted 200 hours and 30 minutes.

Classification: Moderate

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

Rqmt Prov: TCEQ Permit #6387, GC #8 PERMIT

Description: Failed to prevent unauthorized emissions of 25 pounds (lbs) of 1,3-butadiene, 603 lbs of N-butane, 1,756 lbs of butene, 155 lbs of isobutane, and 7 lbs of propylene during an emissions event that occurred on May 24, 2005 and lasted 2 hours. These emissions are not permitted. Since this emissions event was avoidable

Classification: Moderate

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

Rqmt Prov: TCEQ Air Permit No. 24887, GC #8 PERMIT

Description: Failed to prevent a unauthorized emissions of 1,532 lbs of propylene and 10 lbs of isobutane during an avoidable emissions event that occurred on July 1, 2004 and lasted 4 hours and 54 minutes.

Classification: Moderate

Citation: 30 TAC Chapter 101, SubChapter A 101.20(2)
30 TAC Chapter 113, SubChapter C 113.130
30 TAC Chapter 116, SubChapter B 116.115(c)
40 CFR Chapter 61, SubChapter C, PT 61, SubPT V 61.242-6(a)(2)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.167(a)(2)
5C THC Chapter 382, SubChapter A 382.085(b)

Rqmt Prov: Special Condition 2 PERMIT

Description: Failed to properly seal the end of a lines containing volatile organic compounds ("VOCs") and hazardous air pollutants ("HAPs"). Specifically, VOC and HAP concentrations detected from 10 plugs in the Methyl Tertiary Butyl Ether ("MTBE") and Butadiene ("C4 Recovery") units.

Classification: Moderate

Citation: 30 TAC Chapter 101, SubChapter A 101.20(2)
30 TAC Chapter 113, SubChapter C 113.130
30 TAC Chapter 115, SubChapter D 115.352(4)
30 TAC Chapter 116, SubChapter B 116.115(c)
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: Special Condition 10E PERMIT

Special Condition 1E PERMIT

Special Condition 2C PERMIT

Description: Failed to equip each open-ended line or valve with a cap, blind flange, plug, or second valve. Specifically, two valves in the East Tank Farm, one line in the Alkylation Unit, and one line in the C4 Recovery Unit were not equipped with a cap, blind flange, plug, or second valve.

Classification: Moderate

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

Rqmt Prov: 2128, SC No.7A PERMIT

Description: Failed to perform monthly monitoring of the East Plant Cooling Tower, Emission Point Number ("EPN") 24E04. Specifically, streams from six headers returning water to the cooling tower to a single monitoring point were combined prior to monitoring, but required to monitor the six headers individually.

Classification: Moderate

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

Rqmt Prov: 2128, SC No. 7B PERMIT

Description: Failed to maintain an emission rate below the allowable emission limit for EPN 24E04. Specifically, a canister sample was taken at Header Number 2 and results revealed emissions were 6.16 lbs per hour ("lbs/hr"), but the permitted limit is 3.23 lbs/hr.

Classification: Moderate

Citation: 30 TAC Chapter 116, SubChapter B 116.116(a)(1)

Description: Failed to represent the product and process information properly in the renewal application dated August 2004 for Permit No. 24887. Specifically, alkylates were not separated into C5s, C6s, C8s, C9s, and C10s. The alkylates contain 3 to 6% of isopentane and more than 1,102 tons per year is being produced.

Effective Date: 1/26/2008

COURT ORDER EPA CASE NO. 06-2004-3409

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. (COEDS Inv. Track. No.)

1	07/25/2004	(351828)
2	07/29/2004	(263469)
3	08/04/2004	(280108)
4	08/04/2004	(280174)
5	08/11/2004	(284585)
6	08/13/2004	(277268)
7	08/23/2004	(259476)
8	08/24/2004	(351829)

9 08/27/2004 (265746)
10 08/27/2004 (265803)
11 08/27/2004 (266244)
12 08/27/2004 (269133)
13 08/29/2004 (268291)
14 08/31/2004 (271963)
15 08/31/2004 (272796)
16 08/31/2004 (274451)
17 08/31/2004 (276264)
18 09/01/2004 (286398)
19 09/01/2004 (289083)
20 09/01/2004 (289240)
21 09/10/2004 (273388)
22 09/16/2004 (263553)
23 09/23/2004 (351830)
24 10/25/2004 (351831)
25 10/25/2004 (351833)
26 11/01/2004 (285942)
27 11/03/2004 (334297)
28 11/05/2004 (334308)
29 11/05/2004 (334310)
30 11/05/2004 (334314)
31 11/11/2004 (292333)
32 11/11/2004 (292452)
33 11/14/2004 (275792)
34 11/22/2004 (293289)
35 11/22/2004 (339105)
36 11/22/2004 (339107)
37 11/23/2004 (334387)
38 11/23/2004 (334429)
39 11/23/2004 (351832)
40 11/29/2004 (274800)
41 12/06/2004 (275639)
42 12/06/2004 (341908)
43 12/09/2004 (343543)
44 12/14/2004 (339112)
45 12/15/2004 (339111)
46 12/27/2004 (276826)
47 12/27/2004 (381708)
48 12/28/2004 (343601)
49 01/03/2005 (286756)
50 01/03/2005 (339113)
51 01/04/2005 (339104)
52 01/05/2005 (339108)
53 01/07/2005 (339103)
54 01/10/2005 (343232)
55 01/12/2005 (346553)
56 01/18/2005 (336265)
57 02/10/2005 (337111)
58 02/10/2005 (349111)
59 02/10/2005 (349267)
60 02/10/2005 (349316)
61 02/10/2005 (349636)
62 02/11/2005 (336418)
63 02/11/2005 (336433)
64 02/11/2005 (336438)
65 02/17/2005 (343594)
66 02/23/2005 (381706)
67 02/25/2005 (345588)

68 03/03/2005 (339106)
69 03/22/2005 (391707)
70 03/28/2005 (375212)
71 03/28/2005 (375220)
72 03/28/2005 (375234)
73 03/31/2005 (373125)
74 04/06/2005 (375076)
75 04/18/2005 (375016)
76 04/20/2005 (372583)
77 04/20/2005 (376147)
78 04/22/2005 (346277)
79 04/25/2005 (377509)
80 05/03/2005 (419501)
81 05/24/2005 (419502)
82 06/14/2005 (393497)
83 06/21/2005 (419503)
84 06/22/2005 (381407)
85 06/22/2005 (392621)
86 06/23/2005 (378454)
87 06/23/2005 (378466)
88 07/15/2005 (395098)
89 07/18/2005 (392902)
90 07/22/2005 (381313)
91 07/22/2005 (392487)
92 07/22/2005 (392651)
93 07/22/2005 (394428)
94 07/25/2005 (440656)
95 07/26/2005 (399215)
96 08/05/2005 (381400)
97 08/05/2005 (392610)
98 08/05/2005 (399207)
99 08/11/2005 (404321)
100 08/11/2005 (404342)
101 08/11/2005 (404367)
102 08/11/2005 (404370)
103 08/12/2005 (399221)
104 08/15/2005 (404957)
105 08/23/2005 (440657)
106 08/24/2005 (406415)
107 08/26/2005 (372787)
108 08/29/2005 (406161)
109 09/13/2005 (431694)
110 10/24/2005 (440658)
111 10/26/2005 (440659)
112 11/15/2005 (434603)
113 11/18/2005 (437299)
114 11/22/2005 (468155)
115 11/28/2005 (468154)
116 12/01/2005 (435325)
117 12/08/2005 (434728)
118 12/19/2005 (438915)
119 12/21/2005 (468156)
120 02/15/2006 (455481)
121 02/22/2006 (450109)
122 02/24/2006 (451477)
123 02/27/2006 (468153)
124 02/28/2006 (451452)
125 02/28/2006 (451480)
126 02/28/2006 (451483)

127	02/28/2006	(451494)
128	02/28/2006	(451788)
129	03/13/2006	(454890)
130	03/23/2006	(498017)
131	03/24/2006	(457373)
132	03/28/2006	(453139)
133	03/29/2006	(459500)
134	03/31/2006	(455940)
135	04/24/2006	(498018)
136	04/28/2006	(462755)
137	05/16/2006	(463873)
138	05/23/2006	(466508)
139	05/23/2006	(498019)
140	05/24/2006	(465260)
141	05/31/2006	(480405)
142	05/31/2006	(480422)
143	05/31/2006	(480427)
144	05/31/2006	(480433)
145	05/31/2006	(480441)
146	05/31/2006	(480444)
147	06/21/2006	(498020)
148	06/26/2006	(464019)
149	06/30/2006	(483427)
150	07/07/2006	(484895)
151	07/17/2006	(460500)
152	07/17/2006	(464664)
153	07/19/2006	(480415)
154	07/20/2006	(486401)
155	07/24/2006	(520033)
156	07/28/2006	(484749)
157	08/04/2006	(339110)
158	08/15/2006	(481194)
159	08/15/2006	(482128)
160	08/15/2006	(489890)
161	08/16/2006	(457265)
162	08/21/2006	(520034)
163	09/01/2006	(510768)
164	09/05/2006	(486742)
165	09/25/2006	(520035)
166	10/04/2006	(488324)
167	10/24/2006	(544282)
168	11/21/2006	(516667)
169	11/27/2006	(544283)
170	11/30/2006	(531615)
171	12/11/2006	(519152)
172	12/19/2006	(544284)
173	12/29/2006	(535494)
174	01/23/2007	(544285)
175	01/30/2007	(538091)
176	01/31/2007	(517108)
177	01/31/2007	(537091)
178	01/31/2007	(537099)
179	01/31/2007	(537102)
180	02/08/2007	(538420)
181	02/22/2007	(485046)
182	02/22/2007	(574936)
183	02/27/2007	(532597)
184	03/21/2007	(532595)
185	03/23/2007	(574937)

186	04/05/2007	(532607)
187	04/10/2007	(532608)
188	04/12/2007	(541831)
189	04/12/2007	(554839)
190	04/18/2007	(593172)
191	04/23/2007	(539454)
192	04/23/2007	(574938)
193	05/23/2007	(574939)
194	06/25/2007	(574940)
195	06/27/2007	(560042)
196	07/18/2007	(556815)
197	07/18/2007	(566602)
198	07/24/2007	(567353)
199	07/28/2007	(574941)
200	07/30/2007	(543338)
201	08/03/2007	(543345)
202	08/06/2007	(568530)
203	08/06/2007	(568542)
204	08/06/2007	(607498)
205	08/09/2007	(562982)
206	08/09/2007	(563012)
207	08/10/2007	(562990)
208	08/10/2007	(563023)
209	08/10/2007	(564946)
210	08/20/2007	(564294)
211	08/20/2007	(564331)
212	08/20/2007	(564360)
213	08/22/2007	(607499)
214	08/23/2007	(571675)
215	08/24/2007	(543303)
216	08/24/2007	(543306)
217	09/24/2007	(607500)
218	09/28/2007	(563816)
219	09/28/2007	(564856)
220	09/28/2007	(564932)
221	09/28/2007	(566320)
222	10/04/2007	(565773)
223	10/10/2007	(565969)
224	10/10/2007	(566558)
225	10/10/2007	(566616)
226	10/12/2007	(571938)
227	10/12/2007	(572220)
228	10/12/2007	(572252)
229	10/12/2007	(572267)
230	10/12/2007	(572362)
231	10/12/2007	(572404)
232	10/15/2007	(572176)
233	10/16/2007	(593759)
234	10/23/2007	(619405)
235	11/19/2007	(594272)
236	11/19/2007	(619406)
237	11/26/2007	(570252)
238	11/26/2007	(570313)
239	11/26/2007	(570316)
240	11/26/2007	(570346)
241	11/26/2007	(570400)
242	11/28/2007	(596225)
243	12/07/2007	(568047)
244	12/07/2007	(568066)

245	12/07/2007	(568076)
246	12/07/2007	(568153)
247	12/07/2007	(568347)
248	12/07/2007	(568368)
249	12/17/2007	(608808)
250	12/27/2007	(619407)
251	01/02/2008	(595848)
252	01/02/2008	(599541)
253	01/03/2008	(599518)
254	01/03/2008	(599950)
255	01/08/2008	(600740)
256	01/10/2008	(600765)
257	01/10/2008	(613652)
258	01/22/2008	(671912)
259	01/23/2008	(614499)
260	01/25/2008	(615980)
261	01/28/2008	(615871)
262	01/28/2008	(616242)
263	01/29/2008	(610831)
264	02/15/2008	(615597)
265	02/25/2008	(671910)
266	03/06/2008	(596061)
267	03/06/2008	(610691)
268	03/19/2008	(616201)
269	03/19/2008	(616236)
270	03/19/2008	(616259)
271	03/20/2008	(671911)
272	03/26/2008	(637649)
273	03/27/2008	(611770)
274	04/04/2008	(610663)
275	04/10/2008	(616840)
276	04/22/2008	(689830)
277	04/24/2008	(637133)
278	04/29/2008	(641446)
279	05/02/2008	(610690)
280	05/06/2008	(638391)
281	05/06/2008	(638445)
282	05/06/2008	(638471)
283	05/08/2008	(638556)
284	05/16/2008	(639245)
285	05/16/2008	(639472)
286	05/22/2008	(689831)
287	05/23/2008	(639094)
288	06/06/2008	(682324)
289	06/16/2008	(610615)
290	06/17/2008	(636281)
291	06/24/2008	(689832)
292	07/03/2008	(636094)
293	07/03/2008	(681436)
294	07/07/2008	(654572)
295	07/09/2008	(683399)
296	07/10/2008	(685750)
297	07/18/2008	(681438)
298	07/22/2008	(710592)
299	07/30/2008	(687221)
300	08/01/2008	(681437)
301	08/11/2008	(610620)
302	08/11/2008	(637040)
303	08/13/2008	(682388)

304	08/15/2008	(689619)
305	08/25/2008	(710593)
306	08/27/2008	(638212)
307	08/29/2008	(681367)
308	09/08/2008	(681362)
309	10/13/2008	(704398)
310	10/15/2008	(686481)
311	10/15/2008	(686491)
312	10/17/2008	(679974)
313	10/17/2008	(680354)
314	10/22/2008	(682983)
315	10/22/2008	(727384)
316	10/23/2008	(680427)
317	10/23/2008	(681178)
318	10/27/2008	(687534)
319	10/28/2008	(685998)
320	10/29/2008	(686367)
321	10/29/2008	(686377)
322	10/29/2008	(686382)
323	10/29/2008	(687350)
324	10/29/2008	(705305)
325	10/31/2008	(686446)
326	11/07/2008	(701030)
327	11/20/2008	(704732)
328	11/20/2008	(704907)
329	11/21/2008	(706652)
330	11/24/2008	(654539)
331	11/24/2008	(727385)
332	11/25/2008	(707993)
333	12/04/2008	(700744)
334	12/04/2008	(702100)
335	12/05/2008	(654812)
336	12/05/2008	(654846)
337	12/05/2008	(654874)
338	12/05/2008	(707275)
339	12/11/2008	(683007)
340	12/15/2008	(686398)
341	12/15/2008	(686403)
342	12/15/2008	(686411)
343	12/15/2008	(686444)
344	12/15/2008	(686496)
345	12/15/2008	(686500)
346	12/15/2008	(686508)
347	12/16/2008	(710038)
348	12/17/2008	(685609)
349	12/17/2008	(710007)
350	12/22/2008	(727386)
351	01/09/2009	(721591)
352	01/16/2009	(709781)
353	01/16/2009	(721214)
354	01/22/2009	(750128)
355	02/03/2009	(722705)
356	02/10/2009	(726755)
357	02/12/2009	(683026)
358	02/13/2009	(657092)
359	02/16/2009	(724818)
360	02/16/2009	(725983)
361	02/16/2009	(726007)
362	02/16/2009	(726040)

363	02/16/2009	(726571)
364	02/16/2009	(726949)
365	02/17/2009	(726783)
366	02/24/2009	(750125)
367	02/26/2009	(725940)
368	03/23/2009	(750126)
369	03/31/2009	(735618)
370	04/06/2009	(738472)
371	04/09/2009	(738272)
372	04/13/2009	(738348)
373	04/13/2009	(738352)
374	04/13/2009	(738805)
375	04/17/2009	(740559)
376	04/22/2009	(736328)
377	04/28/2009	(737713)
378	04/30/2009	(740883)
379	05/01/2009	(707130)
380	05/04/2009	(738986)
381	05/04/2009	(741949)
382	05/04/2009	(741983)
383	05/04/2009	(741994)
384	05/14/2009	(742317)
385	05/14/2009	(742327)
386	05/15/2009	(742125)
387	05/15/2009	(742826)
388	05/26/2009	(705763)
389	06/17/2009	(749322)
390	06/18/2009	(749474)
391	06/24/2009	(741317)
392	06/24/2009	(744476)
393	06/24/2009	(744489)
394	06/24/2009	(748352)
395	06/29/2009	(741269)
396	06/29/2009	(744624)
397	07/02/2009	(744588)
398	07/02/2009	(745599)
399	07/02/2009	(745661)
400	07/02/2009	(745805)
401	07/03/2009	(747361)
402	07/06/2009	(745792)
403	07/07/2009	(744818)
404	07/08/2009	(745749)
405	07/08/2009	(745772)
406	07/08/2009	(745783)
407	07/09/2009	(701940)
408	07/14/2009	(746327)
409	07/14/2009	(746862)
410	07/15/2009	(746896)
411	07/15/2009	(747036)
412	07/15/2009	(748537)
413	07/16/2009	(748500)
414	07/17/2009	(741607)
415	07/17/2009	(748489)
416	07/17/2009	(748521)
417	07/17/2009	(761599)
418	07/21/2009	(741126)
419	07/21/2009	(748906)

Date: 07/28/2004 (259476) CN600124705
Self Report? NO Classification: Moderate
Citation: 30 TAC Chapter 116, SubChapter B 116.115(b)(2)(G)
5C THC Chapter 382, SubChapter A 382.085(b)
Description: Exceeded permit limits during an avoidable emissions event.

Date: 08/11/2004 (263553) CN600124705
Self Report? NO Classification: Moderate
Citation: 30 TAC Chapter 101, SubChapter F 101.201(a)(2)(G)
30 TAC Chapter 101, SubChapter F 101.201(b)(7)
5C THC Chapter 382, SubChapter A 382.085(b)
Description: Failed to speciate VOC in the Initial Notification and Final Report submitted for an avoidable emissions event.

Date: 08/27/2004 (265746) CN600124705
Self Report? NO Classification: Minor
Citation: 30 TAC Chapter 101, SubChapter F 101.201(a)(2)(D)
30 TAC Chapter 101, SubChapter F 101.201(b)(4)
Description: Equistar failed to properly complete and submit an emissions event notification.
Self Report? NO Classification: Moderate
Citation: 30 TAC Chapter 116, SubChapter B 116.115(b)
5C THC Chapter 382, SubChapter A 382.085(b)
Description: Equistar exceeded permit limits during an avoidable emissions event.

Date: 08/29/2004 (268291) CN600124705
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: Equistar exceeded VOC permit limit.

Date: 08/31/2004 (272796) CN600124705
Self Report? NO Classification: Minor
Citation: 30 TAC Chapter 101, SubChapter F 101.201(a)(2)(H)
30 TAC Chapter 101, SubChapter F 101.201(b)(8)
5C THC Chapter 382, SubChapter A 382.085(b)
Description: Failed to submit administratively complete emissions event notifications.

Date: 08/31/2004 (271963) CN600124705
Self Report? NO Classification: Moderate
Citation: 30 TAC Chapter 101, SubChapter F 101.211(a)(1)(F)
30 TAC Chapter 101, SubChapter F 101.211(b)(5)
30 TAC Chapter 116, SubChapter B 116.115(c)
Description: Equistar was not in compliance with the maintenance, startup, and shutdown rules.

Date: 10/31/2004 (351832) CN600124705
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: 12/27/2004 (276826) CN600124705
Self Report? NO Classification: Moderate
Citation: 30 TAC Chapter 116, SubChapter B 116.115(b)
5C THC Chapter 382, SubChapter A 382.085(b)
TCEQ Air Permit No. 2933, GC #8 PERMIT
Description: Exceeded permit limits during an avoidable emissions event.

Date: 01/03/2005 (286756) CN600124705

Self Report? NO Classification: Moderate
Citation: 22779 PERMIT
30 TAC Chapter 116, SubChapter B 116.115(c)
5C THC Chapter 382, SubChapter A 382.085(b)
Description: Equistar failed to prevent an avoidable emissions event.

Date: 01/04/2005 (339104) CN600124705
Self Report? NO Classification: Moderate
Citation: 30 TAC Chapter 116, SubChapter B 116.115(b)(2)(G)
5C THC Chapter 382, SubChapter A 382.085(b)
Description: Equistar failed to prevent an avoidable emissions event.

Date: 01/10/2005 (343232) CN600124705
Self Report? NO Classification: Minor
Citation: 30 TAC Chapter 290, SubChapter D 290.45(d)(2)(B)(ii)
Description: Failure to provide an adequate ground storage capacity.
Self Report? NO Classification: Minor
Citation: 30 TAC Chapter 290, SubChapter D 290.45(d)(2)(B)(v)
Description: Failure to provide a minimum pressure tank capacity of 220 gallons.

Date: 04/20/2005 (372583) CN600124705
Self Report? NO Classification: Minor
Citation: 30 TAC Chapter 101, SubChapter F 101.201(g)
Description: Equistar failed to submit the Final Report electronically.
Self Report? NO Classification: Moderate
Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
5C THC Chapter 382, SubChapter A 382.085(b)
Permit No. 22779, Special Condition No.1 PERMIT
Description: Equistar failed to prevent an avoidable emissions event.

Date: 08/05/2005 (381400) CN600124705
Self Report? NO Classification: Minor
Citation: 30 TAC Chapter 117, SubChapter E 117.520(c)(2)(A)(ii)(II)
Description: Failure to test within 60 days following installation of NOx control equipment on furnace 3403.

Date: 08/05/2005 (393207) CN600124705
Self Report? NO Classification: Minor
Citation: 30 TAC Chapter 117, SubChapter E 117.520(c)(2)(A)(ii)(II)
Description: Failure to test within 60 days following installation of NOx control equipment on Furnace 4406.

Self Report? NO Classification: Minor
Citation: 30 TAC Chapter 117, SubChapter E 117.520(c)(2)(A)(ii)(II)
Description: Failure to test within 60 days following installation of NOx control equipment on F4410.

Self Report? NO Classification: Minor
Citation: 30 TAC Chapter 117, SubChapter E 117.520(c)(2)(A)(ii)(II)
Description: Failure to test within 60 days following installation of NOx control equipment on Furnace 4401.

Self Report? NO Classification: Minor
Citation: 30 TAC Chapter 117, SubChapter E 117.520(c)(2)(A)(ii)(II)
Description: Failure to test within 60 days following installation of NOx control equipment on Furnace 3401.

Date: 08/05/2005 (392610) CN600124705
Self Report? NO Classification: Minor
Citation: 30 TAC Chapter 117, SubChapter E 117.520(c)(2)(A)(ii)(II)
Description: Failure to test within 60 days following installation of NOx control equipment on Furnace 4404.

Date: 08/10/2005 (404514) CN600124705
Self Report? NO Classification: Moderate
Citation: 30 TAC Chapter 116, SubChapter B 116.115(b)
5C THC Chapter 382, SubChapter A 382.085(b)
TCEQ Permit #2128, GC #8 PERMIT
Description: Failure to prevent a leak in Tower T-301.

Date: 09/13/2005 (431694) CN600124705
Self Report? NO Classification: Minor
Citation: 30 TAC Chapter 290, SubChapter D 290.45(d)(2)(B)(ii)
Description: Failure to provide an adequate ground storage capacity.
Self Report? NO Classification: Minor
Citation: 30 TAC Chapter 290, SubChapter D 290.45(d)(2)(B)(v)
Description: Failure to provide a minimum pressure tank capacity of 220 gallons.

Date: 11/18/2005 (437299) CN600124705
Self Report? NO Classification: Minor
Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)
3130A, SC No. 4 PERMIT
O02179, ST&C No. 10 OP
Description: Failure to operate within pumping rates of Polyols(KOH) and (IMPACT).
Self Report? NO Classification: Minor
Citation: 30 TAC Chapter 117, SubChapter B 117.213(a)
Description: Failure to install the totalizing fuel flow meter on EGBVC6904.

Date: 12/08/2005 (434728) CN600124705
Self Report? NO Classification: Minor
Citation: 30 TAC Chapter 122, SubChapter C 122.222(k)(3)
Description: Failure to submit the off-permit notification for claiming the permit by rule for flare emissions.
Self Report? NO Classification: Minor
Citation: 30 TAC Chapter 106, SubChapter K 106.261(a)(6)
Description: Failure to register the PBR within 10 of increase in flare emissions.
Self Report? NO Classification: Moderate
Citation: 30 TAC Chapter 101, SubChapter A 101.20(1)
30 TAC Chapter 115, SubChapter D 115.352
30 TAC Chapter 116, SubChapter B 116.115(c)
40 CFR Chapter 60, SubChapter C, PT 60, SubPT VV 60.482-1(a)
49130, S.C. No.5 PERMIT
O-02180, S.C No.1A OP
Description: Failure to follow the fugitive monitoring for 172 valves and 5 pumps in the Isopropanol Unit
Self Report? NO Classification: Minor
Citation: 30 TAC Chapter 115, SubChapter D 115.354(5)
30 TAC Chapter 122, SubChapter B 122.143(4)
O-02180, SC. 1.A OP
Description: Failure to have required information on tags attached to visual fugitive leaks
Self Report? NO Classification: Moderate
Citation: 30 TAC Chapter 101, SubChapter A 101.20(2)
30 TAC Chapter 115, SubChapter D 115.352(4)
30 TAC Chapter 116, SubChapter B 116.115(c)
40 CFR Chapter 60, SubChapter C, PT 60, SubPT VV 60.482-6(a)(1)
49130, SC 5.E PERMIT
O-02180, SC 1.A OP
Description: Failure to cap or plug the five open-ended lines in VOC service
Self Report? NO Classification: Moderate
Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)
49130, S.C 7 PERMIT
O-02180, S.C 11 OP
Description: Failure to follow the procedure described in Appendix P, Section 5.5.1 for monitoring the cooling tower (CT-2401) as required by the permit condition

Self Report? NO Classification: Moderate
Citation: 30 TAC Chapter 122, SubChapter B 122.145(2)(A)
Description: Failure to report the deviations regarding the cooling tower monitoring in the deviation reports

Date: 12/19/2005 (438915) CN600124705

Self Report? NO Classification: Moderate
Citation: 30 TAC Chapter 122, SubChapter C 122.210(a)
Description: Failure to submit the federal operating permit (O-02177) minor revision application concurrent with the permit amendment issued on July 26, 2005 and permit by rules claimed in 1997 and 2002.

Self Report? NO Classification: Moderate
Citation: 22779, SC 1 PERMIT
30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)
O-02177, STC 10 OP
Description: Failure to operate tanks and loading arms within maximum allowable emission rates as permitted in the NSR permit 22779.

Self Report? NO Classification: Moderate
Citation: 22779, SC 8 PERMIT
30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)
O-02177, STC 10 OP
Description: Failure to initiate the fugitive monitoring for 22 valves and 3 pumps in the Polybutadiene Unit.

Self Report? NO Classification: Moderate
Citation: 22779, SC 8.E PERMIT
30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)
O-02177, STC 10 OP
Description: Failure to cap or plug the five open-ended lines in VOC service

Date: 12/31/2005 (440659) CN600124705

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: 02/22/2006 (450109) CN600124705

Self Report? NO Classification: Moderate
Citation: 24887 SC1.E PERMIT
30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)
O02176, SC 15 OP

Description: Failure to cap or plug the eighty five (85) open-ended lines in VOC service

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)

Description: Failure to register the PBRs 106.261 and 106.262 within 10 days of addition of a flare analyzer and failure to make off-permit notification concurrently.

Self Report? NO Classification: Moderate
Citation: 30 TAC Chapter 122, SubChapter B 122.142(b)(2)(B)
Description: Failure to represent the several sources that are subject to 30 TAC 111 rules in the Title V Operating Permit.

Self Report? NO Classification: Moderate
Citation: 24887, SC 1 PERMIT
30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)
O02176, SC 15 OP

Description: Failure to include 19 valves and 39 connectors associated with sample systems and failure to include 5 pumps, 38 valves, 104 connectors, and 4 sample points in the fugitive monitoring database.

Self Report? NO Classification: Moderate
Citation: 30 TAC Chapter 115, SubChapter B 115.142
30 TAC Chapter 122, SubChapter B 122.143(4)

O02176, SC 5 OP
Description: Failure to control the wastewater streams as required by 30 TAC 115.142.
Self Report? NO Classification: Minor
Citation: 30 TAC Chapter 122, SubChapter B 122.143(4)
40 CFR Chapter 60, SubChapter C, PT 60, SubPT Kb 60.113b(b)(5)
O02176, SC 1.A OP

Description: Failure to make the tank seal inspection notification 30 days in advance.

Date: 02/28/2006 (451788) CN600124705
Self Report? NO Classification: Minor
Citation: 30 TAC Chapter 115, SubChapter D 115.352(4)
30 TAC Chapter 116, SubChapter B 116.115(c)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.167(a)(1)
NSR Permit No. 8125, SC 6E PA

Description: Failure to plug two open-ended-lines.
Self Report? NO Classification: Minor
Citation: 30 TAC Chapter 117, SubChapter B 117.213(a)

Description: Failure to install fuel flow meter on Diesel Engine, P-3314.
Self Report? NO Classification: Minor
Citation: 40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.182(d)

Description: Failure to include compressor information in the HON Subpart H Semiannual report.
Self Report? NO Classification: Minor
Citation: 40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.181(a)
Description: Failure to maintain appropriate records of 220 connectors, 6 instrument systems, 4 PSVs, 2 pumps, and 101 valves.

Date: 03/24/2006 (457373) CN600124705
Self Report? NO Classification: Minor
Citation: 30 TAC Chapter 290, SubChapter D 290.45(d)(2)(B)(ii)
Description: Failure to provide an adequate ground storage capacity.
Self Report? NO Classification: Minor
Citation: 30 TAC Chapter 290, SubChapter D 290.45(d)(2)(B)(v)
Description: Failure to provide a minimum pressure tank capacity of 220 gallons.

Date: 03/28/2006 (453139) CN600124705
Self Report? NO Classification: Minor
Citation: 30 TAC Chapter 115, SubChapter D 115.352(4)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.167(a)(1)
5C THC Chapter 382, SubChapter A 382.085(b)
NSR Permit No 2936, SC 10E PA
O-02182 Special Terms and Condition 15 OP

Description: Failed to plug 20 open-ended lines.
Self Report? NO Classification: Minor
Citation: 30 TAC Chapter 116, SubChapter B 116.110(a)(4)
30 TAC Chapter 122, SubChapter B 122.143(4)
30 TAC Chapter 122, SubChapter C 122.222(k)(2)
5C THC Chapter 382, SubChapter A 382.085(b)
O-02181 General Terms and Condition OP

Description: The facility failed to register two tanks and one cooling tower within ten (10) days of change as required during August 19, 2004 through November 22, 2004.
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 63.182(d)
5C THC Chapter 382, SubChapter A 382.085(b)
O-02182 General Terms and Condition OP

Description: Failure to include compressor information in the HON Subpart H semiannual report for the reporting period from February 28, 2005 through August 19, 2005.
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 THC Chapter 382, SubChapter A 382.085(b)
Special Condition No. 10F PA
Special Terms and Condition 15 OP

Description: failure to monitor 59 valves that were marked as unsafe to monitor during the third quarter of 2004 from August 19, 2004 through September 30, 2004.

Self Report? NO **Classification:** Minor

Citation: 30 TAC Chapter 115, SubChapter D 115.354(5)
30 TAC Chapter 122, SubChapter B 122.143(4)
5C THC Chapter 382, SubChapter A 382.085(b)
General Terms and Condition OP

Description: failure to put identification number for the leaking fugitive valves during August 19, 2004 through August 19, 2005.

Self Report? NO **Classification:** Minor

Citation: 30 TAC Chapter 115, SubChapter D 115.354
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 63.162(c)
5C THC Chapter 382, SubChapter A 382.085(b)
Special Terms and Condition 15 OP

Description: failure to include 89 connectors, 27 valves, and 19 pumps in the fugitive monitoring program during the third quarter of 2004 from August 19, 2004 through September 30, 2004.

Self Report? NO **Classification:** Minor

Citation: 30 TAC Chapter 116, SubChapter B 116.110(a)(1)

30 TAC Chapter 122, SubChapter B 122.143(4)
5C THC Chapter 382, SubChapter A 382.085(b)
General Terms and Condition OP

Description: failure to obtain a permit by rule (PBR) for the emission point no. SP-4010.

Self Report? NO **Classification:** Minor

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

Description: failure to seal the external floating roof tank, TK-3112. The gasket on the rim vent was missing.

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)
SC No 1 of NSR Permit No. 2936, PA
Special Terms and Conditions 15 OP

Description: failure to obtain appropriate authorization for storing hydrocarbons for the tanks, TK-3113 and TK-3114.

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)
Special Condition 1 PA
Special Terms and Condition 15 OP

Description: failure to comply with the pounds per hour of VOC emission limit for tank No. TK-4002 of TCEQ Air Permit 2936.

Self Report? NO **Classification:** Minor

Citation: 30 TAC Chapter 116, SubChapter B 116.110(a)(1)
30 TAC Chapter 122, SubChapter B 122.143(4)
5C THC Chapter 382, SubChapter A 382.085(b)
General Terms and Conditions OP

Description: failure to obtain a permit by rule (PBR) for the analyzer vent.

Self Report? NO **Classification:** Minor

Citation: 30 TAC Chapter 122, SubChapter B 122.132(a)
5C THC Chapter 382, SubChapter A 382.085(b)

Description: Failure to include all the emission authorizations for the cooling tower were not represented in the Title V permit.

Date: 03/29/2006 (459500)

CN600124705

Self Report? NO

Classification: Moderate

Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
5C THC Chapter 382, SubChapter A 382.085(b)
TCEQ Permit No. 2128 PERMIT

Description: Failure to prevent the release of unauthorized emissions from a railroad tank car PSV.

Date: 03/31/2006 (455940) CN600124705

Self Report? NO Classification: Minor

Citation: 30 TAC Chapter 122, SubChapter B 122.142(b)(2)
5C THC Chapter 382, SubChapter D 382.085(b)

Description: Failure to represent the two sources that are subject to 30 TAC 111 rules in the Title V Operating Permit O-02175.

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)
6245, SC 1 PERMIT
O02175, STC 10 OP

Description: Failure to operate tanks (TK30 & TK31) within maximum allowable emission rates as permitted in the NSR permit 6245.

Self Report? NO Classification: Minor

Citation: 30 TAC Chapter 101, SubChapter A 101.20(1)
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 D 382.085(b)
6245, SC 7.E PERMIT

O02175, STC 10 OP
O02175, STC 1A OP

Description: Failure to cap or plug the thirty-eight (38) open-ended lines in VOC service (C5 recovery unit).

Self Report? NO Classification: Minor

Citation: 30 TAC Chapter 101, SubChapter A 101.20(1)
30 TAC Chapter 122, SubChapter B 122.143(4)
40 CFR Chapter 60, SubChapter C, PT 60, SubPT VV 60.482-5(a)
5C THC Chapter 382, SubChapter D 382.085(b)
O02175, STC 1A OP

Description: Failure to equip the dimer drum feed sampling connection system with closed loop.

Self Report? NO Classification: Minor

Citation: 30 TAC Chapter 101, SubChapter A 101.20(1)
30 TAC Chapter 115, SubChapter D 115.354(5)
30 TAC Chapter 122, SubChapter B 122.143(4)
40 CFR Chapter 60, SubChapter C, PT 60, SubPT VV 60.486(b)(1)
5C THC Chapter 382, SubChapter D 382.085(b)
O02175, STC 1A OP

Description: Failure to have required information on tags attached to visual fugitive leaks

Self Report? NO Classification: Minor

Citation: 30 TAC Chapter 101, SubChapter A 101.20(1)
30 TAC Chapter 115, SubChapter D 115.352
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 60.482-1(a)
5C THC Chapter 382, SubChapter D 382.085(b)
6245, SC 7 PERMIT
O02175, STC 10 OP
O02175, STC 1A OP

Description: Failure to include 2 pumps, 32 valves, and 103 connectors in the C5 recovery unit in fugitive monitoring database.

Date: 05/16/2006 (463873) CN600124705

Self Report? NO Classification: Moderate

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

5C THC Chapter 382, SubChapter A 382.085(b)
TCEQ Permit No. 2128 PERMIT

Description: Failure to prevent the release of unauthorized emissions from a leaking pipeline due to the removal of a blind.

Date: 05/24/2006 (465260) CN600124705

Self Report? NO Classification: Moderate

Citation: 30 TAC Chapter 122, SubChapter B 122.142(b)(2)
5C THC Chapter 382, SubChapter D 382.085(b)

Description: Failure to correctly represent the HON storage vessel provisions, HON container provisions, and 30 TAC 111 rules in the Title V Operating Permit O-02185.

Self Report? NO Classification: Moderate

Citation: 30 TAC Chapter 115, SubChapter B 115.112(a)(2)(A)
30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)
40 CFR Part 63, Subpart G 63.119(c)(2)(ii)
5C THC Chapter 382, SubChapter D 382.085(b)
O-02185, STC 16 OP
O-02185, STC 1A OP
Permit 6387, SC 2 PERMIT

Description: Failure to equip gasket on sample hatch cover and failure to have physical fasteners on float well cover on external floating roof tank (Tank 26).

Self Report? NO Classification: Moderate

Citation: 30 TAC Chapter 115, SubChapter B 115.112(a)(2)(A)
30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)
40 CFR Part 63, Subpart G 63.119(b)(6)
6387, SC 2 PERMIT
O-02185, STC 16 OP
O-02185, STC 1A OP

Description: Failure to cover all the openings on Internal floating roof tanks: Tank 37 and Tank 47 and failure to have physical fasteners on float well covers on Internal floating

roof tanks: Tank 37, 48, and 49.

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 Part 63, Subpart G 63.119(b)(1)
5C THC Chapter 382, SubChapter D 382.085(b)
6387, SC 2 PERMIT
O-02185, STC 1A OP
O-02185, STC 16 OP

Description: Failure to keep the floating roof of Tank 47 always in contact with liquid surface during the regular operations.

Self Report? NO Classification: Moderate

Citation: 30 TAC Chapter 116, SubChapter B 116.110(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)
6387, SC 4.A PERMIT
O-02185, STC 16 OP

Description: Failure to obtain authorization for the emissions resulted from analyzer vents in the MTBE Unit

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)
6387, SC 2 PERMIT
O-02185, STC 1A OP
O-02185, STC 16 OP

Description: Failure to cap or plug the sixty-one (61) open-ended lines in VOC service in MTBE Unit.

Self Report? NO Classification: Minor

Citation: 30 TAC Chapter 115, SubChapter D 115.354(5)

30 TAC Chapter 122, SubChapter B 122.143(4)
5C THC Chapter 382, SubChapter D 382.085(b)
O-02185, STC 1.A OP
Description: Failure to have required information on tags attached to visual fugitive leaks in the MTBE Unit.

Self Report? NO Classification: Minor

Citation: 30 TAC Chapter 115, SubChapter D 115.352
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(a)
5C THC Chapter 382, SubChapter D 382.085(b)
6387, SC 5 PERMIT
O-02185, STC 1.A OP
O-02185, STC 16 OP

Description: Failure to include 2 valves in the MTBE Unit in fugitive monitoring database and comply with the fugitive monitoring requirements.

Self Report? NO Classification: Moderate

Citation: 30 TAC Chapter 115, SubChapter B 115.142
30 TAC Chapter 122, SubChapter B 122.143(4)
5C THC Chapter 382, SubChapter D 382.085(b)
O-02185, SC 5 OP

Description: Failure to control the one wastewater stream (T-1215) as required by 30 TAC 115.142 in MTBE Unit.

Self Report? NO Classification: Minor

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(2)(C)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT G 63.120(b)(9)
6387, SC 2 PERMIT
O-02185, STC 1.A OP
O-02185, STC 16 OP

Description: Failure to make the tank seal inspection (Tank-26) notification 30 days in advance in MTBE Unit.

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)
6387, SC 2 PERMIT
O-02185, STC 1.A OP
O-02185, STC 16 OP

Description: Failure to comply with HON process wastewater provisions for two containers in MTBE Unit.

Date: 06/28/2006 (464019) CN600124705

Self Report? NO Classification: Moderate

Citation: 00391-000 PERMIT
30 TAC Chapter 319, SubChapter A 319.7(a)

Description: Failure to document the sample collection time and the identify of the sample personnel for the Outfall 001
24 hour composite samples.

Date: 07/28/2006 (484749) CN600124705

Self Report? NO Classification: Moderate

Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
5C THC Chapter 382, SubChapter D 382.085(b)
No. 22779, Special Condition No. 1 PERMIT

Description: Equistar failed to prevent this emissions event

Date: 08/15/2006 (489890) CN600124705

Self Report? NO Classification: Minor

Citation: 30 TAC Chapter 335, SubChapter A 335.6(c)

Description: Failure to update Notice of Registration

Date: 08/16/2006 (457265)

CN600124705

Self Report? NO

Classification: Moderate

Citation: 30 TAC Chapter 115, SubChapter C 115.212(a)(1)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT G 63.135(e)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT G 63.152(b)
5C THC Chapter 382, SubChapter D 382.085(b)

Description: Failure to control emissions from drum D3075 and from tank TK20.

Self Report? NO

Classification: Moderate

Citation: 2128, SC 10E PERMIT
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 63, SubChapter C, PT 63, SubPT H 63.167(a)(1)
5C THC Chapter 382, SubChapter D 382.085(b)
O-02184, ST&C 18 OP
O-02184, ST&C 1A OP

Description: Failure to cap or plug 174 open ended lines in VOC service.

Self Report? NO

Classification: Moderate

Citation: 40 CFR Chapter 63, SubChapter C, PT 63, SubPT A 63.6(e)(3)(i)
5C THC Chapter 382, SubChapter D 382.085(b)

Description: Failure to have a Startup/Shutdown/Malfunction plan to address visible emissions from east plant flare.

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 63.163(b)
5C THC Chapter 382, SubChapter D 382.085(b)
O-02184, ST&C 1A OP

Description: Failure to conduct monthly monitoring on 4 HON pumps in January 2005.

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 63.166(a)
5C THC Chapter 382, SubChapter D 382.085(b)
O-02184, ST&C 1A OP

Description: Failure to equip a sample point with a closed loop system on reactor effluent and T1204 overhead.

Self Report? NO

Classification: Moderate

Citation: 30 TAC Chapter 115, SubChapter D 115.354(5)
30 TAC Chapter 115, SubChapter H 115.782(a)

30 TAC Chapter 122, SubChapter B 122.143(4)
5C THC Chapter 382, SubChapter D 382.085(b)
O-02184, ST&C 1H OP

Description: Failure to have identification numbers on the fugitive leak tags attached to 51 components.

Self Report? NO

Classification: Moderate

Citation: 30 TAC Chapter 116, SubChapter B 116.110(a)(1)
30 TAC Chapter 122, SubChapter B 122.132(a)
5C THC Chapter 382, SubChapter D 382.085(b)

Description: Failure to authorize emissions from sampling in the tank farm.

Self Report? NO

Classification: Moderate

Citation: 2128, SC 10 PERMIT
30 TAC Chapter 115, SubChapter D 115.352(1)
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)
O-02184, ST&C 18 OP
O-02184, ST&C 1A OP

Description: Failure to include 16 pumps, 45 valves, and 292 connectors in the fugitive monitoring database.

Self Report? NO

Classification: Moderate

Citation: 30 TAC Chapter 122, SubChapter B 122.143(4)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT G 63.132(a)
5C THC Chapter 382, SubChapter D 382.085(b)
O-02184, ST&C 13 OP

Description: Failure to control emissions from 3 wastewater streams (D-78, D-3055,

D-03102).

Date: 11/30/2006 (544284) CN600124705
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: 02/01/2007 (538420) CN600124705
Self Report? NO Classification: Moderate
Citation: 2933 Special Condition 1 PERMIT
30 TAC Chapter 116, SubChapter B 116.115(c)
5C THC Chapter 382, SubChapter A 382.085(b)
Description: Failure to prevent process water collection system back-up.

Date: 03/31/2007 (574938) CN600124705
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: 04/11/2007 (532608) CN600124705
Self Report? NO Classification: Moderate
Citation: 30 TAC Chapter 122, SubChapter B 122.132(a)
5C THC Chapter 382, SubChapter D 382.085(b)
Description: Failure to include Polyols loading emissions in federal operating permit O-02179.

Date: 04/18/2007 (593172) CN600124705
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: 07/24/2007 (567353) CN600124705
Self Report? NO Classification: Moderate
Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
5C THC Chapter 382, SubChapter D 382.085(b)
No. 1768, Special Condition No. 1 PERMIT
Description: Equistar failed to prevent a hole in a 1/4 inch nipple off of the flow orifice of the charge gas compressor.

Date: 07/31/2007 (607499) CN600124705
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: 07/31/2007 (543338) CN600124705
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)
5C THC Chapter 382, SubChapter D 382.085(b)
FOP O-02175 SC 12 OP
FOP O-02175 SC 1A OP
NSR 6245 SC 7(E) PA
Description: Failure to equip lines in VOC service with caps/plugs from January 24 through December 6, 2006 (NSR 6245; FOP O-02175).
Self Report? NO Classification: Moderate

Citation: 30 TAC Chapter 115, SubChapter D 115.354(5)
 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)
 FOP O-02175 SC 12 OP
 FOP O-02175 SC 1A OP
 NSR 6245 SC 7(H) PA

Description: Failure to equip leaking pumps in VOC and HRVOC service with the required tags from January 10 through May 8, 2006 (NSR 6245; FOP O-02175).

Self Report? NO **Classification:** Moderate

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)
 40 CFR Chapter 60, SubChapter C, PT 60, SubPT VV 60.482-2(c)(1)
 40 CFR Chapter 60, SubChapter C, PT 60, SubPT VV 60.482-8(c)
 5C THC Chapter 382, SubChapter D 382.085(b)
 FOP O-02175 SC 12 OP
 FOP O-02175 SC 1A OP
 NSR 6245 SC 7(I) PA

Description: Failure to repair pumps and connectors within the required time frames (NSR 6245; FOP O-02175).

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 60.487(c)(2)(iv)
 5C THC Chapter 382, SubChapter D 382.085(b)
 FOP O-02175 SC 1A OP

Description: Failure to submit an accurate semiannual report on August 29, 2006 for fugitive equipment leak components subject to NSPS subpart VV to indicate that leaking pumps were on delay of repair list (NSR 6245; FOP O-02175).

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 60.487(c)(2)(vii)
 5C THC Chapter 382, SubChapter D 382.085(b)
 FOP O-02175 SC 1A OP

Description: Failure to submit an accurate semiannual report on August 29, 2006 for fugitive equipment leak components subject to NSPS subpart VV to indicate the reason that leaking pumps were on delay of repair list (NSR 6245; FOP O-02175).

Self Report? NO **Classification:** Moderate

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)
 40 CFR Chapter 60, SubChapter C, PT 60, SubPT VV 60.482-1(a)
 5C THC Chapter 382, SubChapter D 382.085(b)
 FOP O-02175 SC 12 OP
 FOP O-02175 SC 1A OP
 NSR 6245 SC 7 PA

Description: Equistar failed to include 21 connectors and 8 valves in the C5 Recovery LDAR monitoring program (NSR 6245; FOP O-02175).

Date: 11/30/2007 (619407) **CN600124705**

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: 03/06/2008 (610691) **CN600124705**

Self Report? NO **Classification:** Minor

Citation: 30 TAC Chapter 122, SubChapter B 122.143(4)
 40 CFR Chapter 60, SubChapter C, PT 60, SubPT Kb 60.112b(a)(1)(iv)
 40 CFR Chapter 61, SubChapter C, PT 61, SubPT FF 61.351(a)(1)
 5C THSC Chapter 382 382.085(b)
 O-02180 Special Condition #1A OP

Description: Failure to have the required bolts on the float well gauges.

Self Report? NO Classification: Minor
 Citation: 30 TAC Chapter 115, SubChapter H 115.725
 30 TAC Chapter 122, SubChapter B 122.143(4)
 5C THSC Chapter 382 382.085(b)
 O-02180 Special Condition #1J OP
 Description: Failure to conduct the initial and quarterly multi-point calibrations.

Self Report? NO Classification: Minor
 Citation: 30 TAC Chapter 115, SubChapter H 115.722(d)(2)
 30 TAC Chapter 116, SubChapter B 116.115(c)
 30 TAC Chapter 122, SubChapter B 122.143(4)
 49130 Special Condition #8A PERMIT
 5C THSC Chapter 382 382.085(b)
 O-02180 Special Condition #1(J) OP
 O-02180 Special Condition #11 OP
 Description: Failure to not exceed actual flare tip velocity.

Self Report? NO Classification: Minor
 Citation: 30 TAC Chapter 122, SubChapter B 122.143(4)
 40 CFR Chapter 60, SubChapter C, PT 60, SubPT Kb 60.112b(a)(1)(iv)
 40 CFR Chapter 60, SubChapter C, PT 60, SubPT Kb 60.112b(a)(1)(v)
 40 CFR Chapter 61, SubChapter C, PT 61, SubPT FF 61.351(a)(1)
 5C THSC Chapter 382 382.085(b)
 O-02180 Special Condition #1A OP
 Description: Failure to seal the tank's, MIPTK2615, vacuum vent that was found open during an annual inspection.

Self Report? NO Classification: Minor
 Citation: 30 TAC Chapter 117, SubChapter B 117.206(f)
 30 TAC Chapter 122, SubChapter B 122.143(4)
 5C THSC Chapter 382 382.085(b)
 O-02180 Special Condition #1(l) OP
 Description: Failure to conduct engine testing during appropriate operating hours.

Self Report? NO Classification: Minor
 Citation: 30 TAC Chapter 115, SubChapter H 115.722(d)(1)
 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)
 O-02180 Special Condition #11 OP
 O-02180 Special Condition #1J OP
 Special Condition #8A PERMIT
 Description: Velocity to the flare, MIPFL2501, was exceeded during the process of activating the reactor catalyst during nine one hour periods.

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)
 40 CFR Part 60, Subpart VV 60.482-6
 49130 Special Condition #5E PERMIT
 5C THSC Chapter 382 382.085(b)
 O-02180 Special Condition #11 OP
 O-02180 Special Condition #1A OP
 O-02180 Special Condition #1J OP
 Description: Failure to prevent one open-ended line found in VOC service.

Self Report? NO Classification: Minor
 Citation: 30 TAC Chapter 115, SubChapter H 115.722(d)(1)
 30 TAC Chapter 116, SubChapter B 116.115(c)
 30 TAC Chapter 122, SubChapter B 122.143(4)
 49130 Special Condition #8A PERMIT
 5C THSC Chapter 382 382.085(b)
 O-02180 Special Condition #11 OP
 O-02180 Special Condition #1J OP
 Description: Permit limits to the flare, MIPFL2501, were exceeded due to incorrect factor used in permit calculation.

Date: 03/07/2008 (596061)

CN600124705

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 THSC Chapter 382 382.085(b)
FOP O-02179 SC 10 OP
NSR Permit 3130A SC 8E PA

Description: Failed to seal an open ended line.

Date: 03/27/2008 (611770) CN600124705

Self Report? NO Classification: Moderate

Citation: 30 TAC Chapter 335, SubChapter F 335.152(a)(8)
40 CFR Chapter 264, SubChapter I, PT 264, SubPT J 264.191(a)
PP II-C-2-h PERMIT

Description: Tank system assessment and certification was not adequate.

Self Report? NO Classification: Moderate

Citation: 30 TAC Chapter 335, SubChapter F 335.152(a)(8)
40 CFR Chapter 264, SubChapter I, PT 264, SubPT J 264.193(e)(1)(III)
PP-II-C-2-h PERMIT

Description: Coating for the secondary containment showed visible cracks.

Date: 03/31/2008 (689830) CN600124705

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: 04/04/2008 (610663) CN600124705

Self Report? NO Classification: Moderate

Citation: 30 TAC Chapter 122, SubChapter B 122.143(4)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT G 63.119(b)(6)
5C THSC Chapter 382 382.085(b)
Special Condition (SC) #1A OP

Description: Failure to have bolts or fasteners on the float well gauge of Tanks 3102, 3111A, 3111B, and 3113 (Category A4 violation).

Self Report? NO Classification: Minor

Citation: 30 TAC Chapter 115, SubChapter B 115.112(a)(2)(A)
30 TAC Chapter 122, SubChapter B 122.143(4)
5C THSC Chapter 382 382.085(b)
SC #1A OP

Description: Failure to have tank 3114's piping on the existing internal ladder way closed to the liquid from April 18, 2007 through July 27, 2007.

Self Report? NO Classification: Moderate

Citation: 30 TAC Chapter 122, SubChapter B 122.143(4)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT G 63.119(b)(1)
5C THSC Chapter 382 382.085(b)
SC #1 PERMIT
SC #s 1 and 15 OP

Description: Failure to have Tank 3102 floating roof set on the roof legs on August 23, 2006. This constitutes a violation of New Source Review (NSR) Permit #2936, Special Condition (SC) #1 and 40 CFR 63.119(b)(1). (B19(g)(1))

Self Report? NO Classification: Moderate

Citation: 30 TAC Chapter 115, SubChapter H 115.767(1)
30 TAC Chapter 122, SubChapter B 122.143(4)
5C THSC Chapter 382 382.085(b)
SC #1K(iv) OP

Description: Failure to have cooling tower differential pressure fall below 5 psig for one minute on October 7, 2006. (B19(g)(1))

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)

5C THSC Chapter 382 382.085(b)
SC #1A OP

SC #8E PERMIT
Description: Failure to have an open ended line in volatile organic compound (VOC) service on February 9, 2007. This constitutes a violation of NSR Permit #2936, SC #10, 30 TAC 115.352(4), and 40 CFR 63.167(a)(1). (C10)

Date: 05/02/2008 (610690) CN600124705

Self Report? NO Classification: Minor
Citation: 30 TAC Chapter 117, SubChapter B 117.203(a)(12)
30 TAC Chapter 122, SubChapter B 122.143(4)
5C THSC Chapter 382 382.085(b)
O-02181 Special Condition #1A OP

Description: Failure to prevent the diesel firewater pumps from exceeding the 100 hour runtime limit based on the rolling 12 month average.

Self Report? NO Classification: Minor
Citation: 2128 Special Condition #8E PERMIT
24887 Special Condition #1E PERMIT
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)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.167(a)(1)
49120 Special Condition #2D PERMIT
5C THSC Chapter 382 382.085(b)
6245 Special Condition #7E PERMIT
O-02181 Special Condition #1(I) OP
O-02181 Special Condition #1A OP
O-02181 Special Condition #22 OP

Description: Failure to seal 8 open-ended lines in VOC service.

Self Report? NO Classification: Minor
Citation: 30 TAC Chapter 115, SubChapter H 115.764(a)(1)
30 TAC Chapter 122, SubChapter B 122.143(4)
5C THSC Chapter 382 382.085(b)
O-02181 Special Condition #1(I) OP

Description: Failure to perform the yearly preventative maintenance (PM).

Self Report? NO Classification: Minor
Citation: 30 TAC Chapter 115, SubChapter C 115.244
30 TAC Chapter 122, SubChapter B 122.143(4)
5C THSC Chapter 382 382.085(b)
O-02181 Special Condition #6D OP

Description: Failure to conduct the Stage II vapor recovery daily inspection.

Self Report? NO Classification: Minor
Citation: 30 TAC Chapter 106, SubChapter S 106.433(2)(C)
30 TAC Chapter 122, SubChapter B 122.143(4)
5C THSC Chapter 382 382.085(b)
O-02181 Special Condition #22 OP

Description: Failure to properly seal three containers of a solvent that were left open in the unit.

Self Report? NO Classification: Minor
Citation: 30 TAC Chapter 122, SubChapter B 122.143(4)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT G 63.152(f)
5C THSC Chapter 382 382.085(b)
O-02181 Special Condition #1A OP

Description: Failure to maintain continuous monitoring data in historian for the Alkyl Flare volumetric flow.

Date: 06/16/2008 (610615) CN600124705

Self Report? NO Classification: Moderate
Citation: 30 TAC Chapter 115, SubChapter B 115.112(d)(2)(H)
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 G 63.119(b)(1)
5C THSC Chapter 382 382.085(b)
FOP No. O-2183 ST&C 12 OP

Permit No. 8125, SC 1 PERMIT

Description: RE had unauthorized emissions of VOC for Methanol Tank TK-5102.
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 G 63.119(b)(6)
5C THSC Chapter 382 382.085(b)
FOP O-2183 ST&C 12 OP
Permit No. 8125, SC 2B PERMIT

Description: RE failed to ensure that the cap on the gauge float well was kept air-tight with a bolt or fastener on three tanks.

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)
FOP No. O-2183, ST&C 12 OP
FOP No. O-2183, ST&C 1A OP
Permit No. 8125, SC 6 PERMIT

Description: RE had failed to seal 3 open-ended lines in VOC service.

Date: 06/17/2008 (636281) CN600124705

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)
Special Condition #15 OP
Special Condition #1E PERMIT

Description: Failure to seal 20 open-ended lines in VOC 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)
5C THSC Chapter 382 382.085(b)
Special Condition #15 OP
Special Condition #1F PERMIT

Description: Failure to monitor two valves in VOC service.

Date: 07/03/2008 (636094) CN600124705

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)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.167(a)(1)
5C THSC Chapter 382 382.085(b)
SC #18 OP
SC #8E PERMIT
Special Condition (SC) #1A OP

Description: failure to seal twenty-five open ended lines in volatile organic compound service.
(Category C10)

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)
SC #1 PERMIT
SC #18 OP

Description: Failure to control unauthorized hourly emissions from reactors, R-309A, B, C.
(Category A12(i)(6))

Self Report? NO Classification: Minor
Citation: 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)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.162(f)(1)

5C THSC Chapter 382 382.085(b)
 SC #18 OP
 SC #1A OP
 SC #8I PERMIT
 Description: failure to tag a leaking seal.

Self Report? NO Classification: Minor
 Citation: 30 TAC Chapter 115, SubChapter D 115.352(2)
 30 TAC Chapter 115, SubChapter H 115.782(b)(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 63.174(d)
 5C THSC Chapter 382 382.085(b)
 SC #1 OP
 SC #18 OP
 SC #8I PERMIT
 Description: Failure to make a first attempt for repair on two leaking components (Category C4 violation).

Self Report? NO Classification: Minor
 Citation: 30 TAC Chapter 115, SubChapter H 115.781(b)
 30 TAC Chapter 122, SubChapter B 122.143(4)
 5C THSC Chapter 382 382.085(b)
 SC #1A OP
 Description: failure to follow Reference Method 21 for twenty-five components

Date: 07/18/2008 (681438) CN600124705
 Self Report? NO Classification: Moderate
 Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
 5C THSC Chapter 382 382.085(b)
 Special Condition #1 PERMIT
 Description: Failure to prevent an electrical power loss and the mechanical failure of a Process Safety Valve Bellow which resulted in flaring and a Process Safety Valve Bellow leak.

Date: 07/30/2008 (687221) CN600124705
 Self Report? NO Classification: Moderate
 Citation: #2933 S.C. 1 PERMIT
 30 TAC Chapter 116, SubChapter B 116.115(c)
 5C THSC Chapter 382 382.085(b)
 Description: Failure to meet the affirmative defense for Incident #108500 regarding a pipe failure in D-4333.

Date: 08/01/2008 (681437) CN600124705
 Self Report? NO Classification: Moderate
 Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
 5C THSC Chapter 382 382.085(b)
 Special Condition #1 PERMIT
 Description: Failure to prevent a hole in the first feed system line which resulted in a release of volatile organic compounds.

Date: 08/11/2008 (610620) CN600124705
 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)
 ST&C 1A OP
 Description: Failure to collect flair HRVOC samples by the 10th hour after analyzer malfunction.

Self Report? NO Classification: Minor
 Citation: 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 THSC Chapter 382 382.085(b)

SC 8H PERMIT
ST&C 10 OP

Description: Failure to tag leaking component in VOC service.

Date: 08/11/2008 (637040) CN600124705

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)
Special Conditions, No. 4A PERMIT
Special Terms and Conditions, No. 18 OP
Special Terms and Conditions, No. 1A OP

Description: Failure to control emissions of VOC from a process safety valve (PSV)

99PVRLS00 on MTBE Tank TK-19.

Self Report? NO Classification: Minor

Citation: 30 TAC Chapter 122, SubChapter B 122.143(4)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT G 63.119(b)(6)
5C THSC Chapter 382 382.085(b)
Special Terms and Conditions, No. 1A OP

Description: Failure to keep the cover on a gauge float well air-tight with a bolt or fastener on tank TK-37.

Self Report? NO Classification: Minor

Citation: 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 63, SubChapter C, PT 63, SubPT H 63.167(a)(1)
5C THSC Chapter 382 382.085(b)
Special Condition No. 6E PERMIT
Special Terms and Conditions, No. 18 OP
Special Terms and Conditions, No. 1H OP

Description: Failure to seal 15 open-ended valves or lines with a cap, blind flange, plug or a second valve.

Date: 08/13/2008 (682388) CN600124705

Self Report? NO Classification: Moderate

Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
5C THSC Chapter 382 382.085(b)
TCEQ Air Permit #2128, SC# 1 PA

Description: Equistar failed to prevent the seal leak from pump P-368B while adjusting the pump shaft during the coupling of the motor to the pump.

Date: 08/27/2008 (638212) CN600124705

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 Part 60, Subpart VV 60.482-6
5C THSC Chapter 382 382.085(b)
FOP O-02175 Special Condition 12 OP
Permit 6245, Special Condition 7H PERMIT

Description: Failure to cap open-ended lines.

Self Report? NO Classification: Moderate

Citation: 30 TAC Chapter 115, SubChapter D 115.354(5)
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 63.162(f)(1)
5C THSC Chapter 382 382.085(b)
FOP No. O-02175, Special Conditions 12 OP
Permit No. 6245, Special Condition 7H PERMIT

Description: Failure to tag compressor seal.

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)
40 CFR Chapter 60, SubChapter C, PT 60, SubPT VV 60.482-7(c)(1)
5C THSC Chapter 382 382.085(b)
FOP No. O-02175, Special Condition 12 OP
Permit 6245, Special Condition 7H PERMIT

Description: Failure to monitor valves.

Date: 08/29/2008 (681367)

CN600124705

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)
5C THSC Chapter 382 382.085(b)
FOP O-02174 STC 21 OP
NSR Permit 2933 SC 13E PA

Description: LB failed to seal 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)

5C THSC Chapter 382 382.085(b)
FOP O-02174 STC 21 OP
NSR 2933 SC 10 PA

Description: Failure to continuously monitor the fuel gas.

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)
FOP O-2174 STC 21 OP
NSR 2933 SC 1 PA

Description: Failure to maintain hourly tank (Tk-48008 & Tk-4917) emissions within the MAERT.

Self Report? NO

Classification: Minor

Citation: 30 TAC Chapter 117, SubChapter B 117.345(b)(1)
5C THSC Chapter 382 382.085(b)

Description: Failed to submit test notification within required time frame.

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)
FOP O-02174 STC 21 OP
NSR 2933 SC 1 PA

Description: Failure to maintain Tk-48304 emissions within the MAERT, due to operations.

Self Report? NO

Classification: Moderate

Citation: 30 TAC Chapter 117, SubChapter B 117.310(c)(1)
5C THSC Chapter 382 382.085(b)

Description: Failure to maintain furnace CO emissions within allowable limits.

Self Report? NO

Classification: Minor

Citation: 30 TAC Chapter 122, SubChapter B 122.143(4)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT G 63.119(b)(6)
5C THSC Chapter 382 382.085(b)
FOP O-2174 STC 1A OP

Description: Failure to install proper bolts on floating roof tanks

Self Report? NO

Classification: Minor

Citation: 30 TAC Chapter 117, SubChapter B 117.310(c)(1)
5C THSC Chapter 382 382.085(b)

Description: Failure to maintain diesel engine CO emissions less than limit.

Self Report? NO

Classification: Moderate

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 TT 63.1004(a)(1)(i)
5C THSC Chapter 382 382.085(b)
FOP O-02174 STC 1E OP
NSR 2933 SC 13F PA

Description: Failure to monitor valves in VOC/EMACT service

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 UU 63.1027(b)
5C THSC Chapter 382 382.085(b)
FOP O-2174 STC 21 OP
NSR 2933 SC 15 PA
NSR 2933 SC 16 PA

Description: Failure to monitor connectors in VOC service.
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 THSC Chapter 382 382.085(b)
FOP O-2174 STC 1A OP

Description: Failure to continuously record parameters.
Self Report? NO Classification: Minor

Citation: 30 TAC Chapter 115, SubChapter D 115.354(5)
5C THSC Chapter 382 382.085(b)
FOP O-2174 STC 1A OP
NSR 2933 SC 13 H PA

Description: Failure to tag leaking components

Date: 09/09/2008 (681362) CN600124705

Self Report? NO Classification: Moderate

Citation: 30 TAC Chapter 115, SubChapter H 115.725(d)(2)(A)(I)
5C THSC Chapter 382 382.085(b)

Description: Failed to calibrate OP-1 GC Analyzer within specifications
Self Report? NO Classification: Moderate

Citation: 30 TAC Chapter 115, SubChapter H 115.725(d)(3)
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)
FOP O-1426 STC 22 OP
NSR Permit 1768 SC 13D PA

Description: Failed to maintain the OP-1 GC Analyzer downtime to less than 5%.
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 THSC Chapter 382 382.085(b)
FOP 1426 General Terms and Conditions OP

Description: Failed to report all instances of deviations.
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 UU 63.1033(b)(1)
5C THSC Chapter 382 382.085(b)
FOP O-1426 STC 22 OP
NSR Permit 1768 SC 14E PA

Description: Failed to maintain a seal on open-ended lines.
Self Report? NO Classification: Minor

Citation: 30 TAC Chapter 115, SubChapter H 115.722(c)(1)
5C THSC Chapter 382 382.085(b)

Description: Failed to maintain HRVOC emissions within 1,200 lbs/hr cap.
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)
FOP O-1426 STC 22 OP
NSR Permit 1768 SC 10 PA

Description: Failed to continuously monitor the fuel gas.
Self Report? NO Classification: Minor

Citation: 30 TAC Chapter 117, SubChapter B 117.345(c)
5C THSC Chapter 382 382.085(b)

Description: Failed to submit test report within 60 days.

Self Report? NO Classification: Minor
Citation: 30 TAC Chapter 115, SubChapter D 115.354(5)
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 63.181(b)
5C THSC Chapter 382 382.085(b)
FOP O-1426 STC 1A OP
FOP O-1426 STC 22 OP
NSR Permit 1768 SC 14H PA

Description: Failed to tag a leaking component, upon discovery.

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)
FOP O-1426 STC 22 OP
NSR Permit 1768 SC 5E PA

Description: Failed to install submerged fill pipe on storage tanks.

Self Report? NO Classification: Minor
Citation: 30 TAC Chapter 122, SubChapter B 122.143(4)
40 CFR Chapter 60, SubChapter C, PT 60, SubPT K 60.112(a)(1)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT G 63.119(b)(6)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT WW 63.1063(a)(2)(vi)

5C THSC Chapter 382 382.085(b)
FOP O-1426 STC 1A OP

Description: Failed to install float well gauge bolts.

Self Report? NO Classification: Minor
Citation: 30 TAC Chapter 117, SubChapter B 117.345(b)(2)
5C THSC Chapter 382 382.085(b)

Description: Failed to submit post RATA within 15 days.

Self Report? NO Classification: Minor
Citation: 30 TAC Chapter 115, SubChapter H 115.766(a)(6)
5C THSC Chapter 382 382.085(b)

Description: Failed to complete the HRVOC Corrective Action Plan.

Self Report? NO Classification: Minor
Citation: 30 TAC Chapter 117, SubChapter B 117.340(f)(1)
30 TAC Chapter 117, SubChapter G 117.8100(a)(1)(C)
5C THSC Chapter 382 382.085(b)

Description: Failed to perform Cylinder Gas Audit in accordance with audit specifications.

Self Report? NO Classification: Minor
Citation: 30 TAC Chapter 117, SubChapter G 117.8140(b)
5C THSC Chapter 382 382.085(b)

Description: Failed to test diesel engine on a quarterly 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 THSC Chapter 382 382.085(b)
FOP O-1426 STC 1A OP

Description: Failed to continuously record parameters.

Self Report? NO Classification: Minor
Citation: 30 TAC Chapter 115, SubChapter H 115.782(c)(2)(A)(i)
5C THSC Chapter 382 382.085(b)

Description: Failed to conduct Extra-Ordinary Efforts.

Date: 10/31/2008 (727385) CN600124705

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: 10/31/2008 (705305) CN600124705

Self Report? NO Classification: Minor
Citation: 30 TAC Chapter 122, SubChapter B 122.143(4)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT G 63.119(b)(6)

5C THSC Chapter 382 382.085(b)
 FOP O-2174 STC 1A OP
Description: Failure to install proper bolts on floating roof tanks

Date: 11/30/2008 (727386) **CN600124705**
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: 12/05/2008 (707275) **CN600124705**
Self Report? NO **Classification:** Moderate
Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
 5C THSC Chapter 382 382.085(b)
 TCEQ Air Permit #1768, SC #1 PA
Description: Equistar failed to prevent the exchanger leak into Olefins 1 Cooling Tower which resulted in this emissions event.

Self Report? NO **Classification:** Moderate
Citation: 30 TAC Chapter 101, SubChapter F 101.201(a)(1)(B)
 5C THSC Chapter 382 382.085(b)
Description: Equistar failed to report the emissions event within 24 hours of discovery.

Date: 01/09/2009 (721591) **CN600124705**
Self Report? NO **Classification:** Moderate
Citation: 30 TAC Chapter 111, SubChapter A 111.111(a)(1)(B)
 5C THSC Chapter 382 382.085(b)
Description: Equistar failed to prevent excess opacity during an abrasive transfer.

Date: 01/16/2009 (709781) **CN600124705**

Self Report? NO **Classification:** Minor
Citation: 30 TAC Chapter 115, SubChapter B 115.122(a)(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 A 60.18(c)(3)(II)
 5C THSC Chapter 382 382.085(b)
 NSR 49130, Special Condition 8A PERMIT
 O-02180 Special Condition 11 OP
Description: Failure to maintain the IPOH flare above the minimum net heating value of 300 BTU/scf for four one-hour periods on 10/26/2007.

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)
 5C THSC Chapter 382 382.085(b)
 O-02180 Special Condition 1(A) OP
Description: Failure to conduct monthly pump monitoring on 23 pumps in the MIPFG unit.

Self Report? NO **Classification:** Moderate
Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
 30 TAC Chapter 122, SubChapter B 122.143(4)
 49130, Special Condition 1 PERMIT
 5C THSC Chapter 382 382.085(b)
 O-02180 Special Condition 11 OP
Description: Failure to stay within their permitted emissions limits in the MAERT.

Self Report? NO **Classification:** Minor
Citation: 30 TAC Chapter 122, SubChapter B 122.143(4)
 40 CFR Chapter 60, SubChapter C, PT 60, SubPT Kb 60.112b(a)(1)(iv)
 5C THSC Chapter 382 382.085(b)
 O-02180, Special Condition 1(A) OP
Description: Failure to maintain the required bolt on the float well gauge on tank TK-3110, Unit ID MIPTK3310, and tank TK-2615, Unit ID MIPTK2615.

Date: 04/28/2009 (737713) **CN600124705**

Self Report? NO Classification: Minor
Citation: 30 TAC Chapter 101, SubChapter F 101.201(b)(1)(H)
5C THSC Chapter 382 382.085(b)
Description: Equistar Chemicals LP (Equistar), Channelview Complex, failed to provide the permit number governing the facilities involved in the emissions event.
Self Report? NO Classification: Moderate
Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
5C THSC Chapter 382 382.085(b)
Special Condition #1 PERMIT
Description: Equistar failed to prevent unauthorized emissions, by a leak due to improper installation, incorrect selection of the gasket, and the pre-existing piping misalignment in its PolyBD unit.

Date: 05/04/2009 (738986) CN600124705
Self Report? NO Classification: Minor
Citation: 30 TAC Chapter 319, SubChapter A 319.11(b)
Description: Failure to utilize the proper analytical methods and techniques for total chlorine residual.

Date: 07/03/2009 (747361) CN600124705
Self Report? NO Classification: Minor
Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
5C THSC Chapter 382 382.085(b)
No. 2933, Special Condition #1 PERMIT
Description: Failure to prevent unauthorized emissions; specifically, Equistar failed to maintain fuel gas to Superheaters F-48001A/B resulting in a shutdown, causing the CPI Separator vent stream to route 48.5 pounds of unauthorized Volatile Organic Compounds (VOCs) to the atmosphere.

Date: 07/07/2009 (744818) CN600124705
Self Report? NO Classification: Minor
Citation: 30 TAC Chapter 111, SubChapter A 111.111(a)(4)(A)
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)(1)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT A 63.11(b)(4)
5C THSC Chapter 382 382.085(b)
Special Condition 4C PERMIT
Special Terms and Conditions 1A OP
Special Terms and Conditions 22 OP
Description: Failure to maintain steam going to flare resulting in a smoking flare. (CATEGORY C4 violation)

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)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.163(b)(1)
5C THSC Chapter 382 382.085(b)
Special Terms and Conditions 1A OP
Description: Failure to conduct monthly pump monitoring on eleven (11) pumps. (CATEGORY C1 violation)

Self Report? NO Classification: Minor
Citation: 30 TAC Chapter 117, SubChapter B 117.340(j)
30 TAC Chapter 122, SubChapter B 122.143(4)
5C THSC Chapter 382 382.085(b)
Special Terms and Conditions 1A OP
Special Terms and Conditions 7B OP
Description: Failure to maintain the run time meter on Unit ID EUTG1111. (CATEGORY C4 violation)

Self Report? NO Classification: Moderate
Citation: 30 TAC Chapter 111, SubChapter B 111.205(c)
30 TAC Chapter 122, SubChapter B 122.143(4)
5C THSC Chapter 382 382.085(b)
Special Terms and Conditions 3FI OP

Description: Failure to provide fire extinguisher training notifications to the TCEQ and the local pollution control agency (Harris County) from 03/14/2007 through 03/27/2008. (CATEGORY B3 violation)
Self Report? NO **Classification:** Minor
Citation: 30 TAC Chapter 106, SubChapter T 106.454(3)(B)
 30 TAC Chapter 115, SubChapter E 115.412(1)(A)
 5C THSC Chapter 382 382.085(b)
 Special Terms and Conditions 22 OP

Description: Failure to close the lid on the part washer after use. (CATEGORY C4 violation)
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 THSC Chapter 382 382.085(b)
 General Terms and Conditions OP

Description: Failure to report all deviations during the deviation reporting period. (CATEGORY C3 violation)
Self Report? NO **Classification:** Moderate
Citation: 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)
 Special Terms and Conditions 23 OP

Description: Failure to maintain emissions on Unit ID ZMSENAIS during usage. (CATEGORY B14 violation)
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 FF 61.356(j)(7)
 5C THSC Chapter 382 382.085(b)
 Special Condition 4B PERMIT
 Special Terms and Conditions 1A OP
 Special Terms and Conditions 22 OP

Description: Failure to maintain flare pilot flame records. (CATEGORY C3 violation)
Self Report? NO **Classification:** Minor
Citation: 30 TAC Chapter 117, SubChapter B 117.310(c)(1)
 30 TAC Chapter 122, SubChapter B 122.143(4)
 5C THSC Chapter 382 382.085(b)
 Special Terms and Conditions 1A OP

Description: Failure to maintain emissions on Unit ID ZMSENAIS during a quarterly stack test. (CATEGORY C4 violation)

F. Environmental audits.

Notice of Intent Date: 07/26/2005 (453654)

Disclosure Date: 10/06/2005

Viol. Classification: Moderate

Citation: 30 TAC Chapter 335, SubChapter A 335.6(c)

Description: Failure to update NOR.

Viol. Classification: Moderate

Citation: 30 TAC Chapter 335, SubChapter C 335.69(a)(1)(B)

Description: Failure to classify waste prior to disposal.

Notice of Intent Date: 10/06/2005 (434934)

No DOV Associated

Notice of Intent Date: 11/28/2006 (534269)

No DOV Associated

Notice of Intent Date: 07/30/2007 (593548)

No DOV Associated

Notice of Intent Date: 08/16/2007 (593550)

No DOV Associated

Notice of Intent Date: 08/16/2007 (593554)

No DOV Associated

Notice of Intent Date: 10/02/2007 (595562)

Disclosure Date: 10/25/2007

Viol. Classification: Moderate

Citation: 40 CFR Chapter 61, SubChapter C, PT 61, SubPT FF 61.343
40 CFR Chapter 61, SubChapter C, PT 61, SubPT FF 61.349
40 CFR Chapter 63, SubChapter C, PT 63, SubPT G 63.148
40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.172

Rqmt Prov:

PERMIT Operating Permit O-2181

Description: Failed to comply with Method 21 for regulated HON group 1 wastewater closed vent systems.

Viol. Classification: Moderate

Citation: 30 TAC Chapter 115, SubChapter D 115.352
30 TAC Chapter 115, SubChapter H 115.786
40 CFR Chapter 60, SubChapter C, PT 60, SubPT VV 60.482-1
40 CFR Part 60, Subpart VV 60.482-10
40 CFR Part 60, Subpart VV 60.482-4
40 CFR Part 60, Subpart VV 60.482-7
40 CFR Part 60, Subpart VV 60.485
40 CFR Part 60, Subpart VV 60.487
40 CFR Chapter 61, SubChapter C, PT 61, SubPT I 61.112
40 CFR Chapter 61, SubChapter C, PT 61, SubPT V 61.242-1
40 CFR Part 61, Subpart V 61.242-4
40 CFR Part 61, Subpart V 61.242-7
40 CFR Chapter 63, SubChapter C, PT 63, SubPT UU 63.1022
40 CFR Chapter 63, SubChapter C, PT 63, SubPT UU 63.1031
40 CFR Chapter 63, SubChapter C, PT 63, SubPT UU 63.1038
40 CFR Chapter 63, SubChapter C, PT 63, SubPT UU 63.1039
40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.162
40 CFR Part 63, Subpart H 63.174
40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.181
40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.182

Description: Failure to always perform initial and periodic monitoring and there were instances where new or replaced components were not monitored.

Viol. Classification: Moderate

Citation: 40 CFR Chapter 60, SubChapter C, PT 60, SubPT K 60.112
40 CFR Chapter 60, SubChapter C, PT 60, SubPT VV 60.482-1
40 CFR Part 60, Subpart VV 60.482-10
40 CFR Part 60, Subpart VV 60.482-4
40 CFR Part 60, Subpart VV 60.482-7
40 CFR Part 60, Subpart VV 60.485
40 CFR Part 60, Subpart VV 60.487
40 CFR Chapter 61, SubChapter C, PT 61, SubPT V 61.242-1
40 CFR Chapter 61, SubChapter C, PT 61, SubPT V 61.242-11
40 CFR Part 61, Subpart V 61.242-4
40 CFR Part 61, Subpart V 61.242-7
40 CFR Chapter 61, SubChapter C, PT 61, SubPT V 61.245
40 CFR Chapter 61, SubChapter C, PT 61, SubPT V 61.247
40 CFR Chapter 63, SubChapter C, PT 63, SubPT UU 63.1022
40 CFR Chapter 63, SubChapter C, PT 63, SubPT UU 63.1031
40 CFR Chapter 63, SubChapter C, PT 63, SubPT UU 63.1034

40 CFR Chapter 63, SubChapter C, PT 63, SubPT UU 63.1038
40 CFR Chapter 63, SubChapter C, PT 63, SubPT UU 63.1039
40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.162
40 CFR Part 63, Subpart H 63.174
40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.181
40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.182

Description: Failure to complete instances of first repair attempts and final repair attempts within the required timeframes.

Viol. Classification: Moderate

Citation: 40 CFR Chapter 60, SubChapter C, PT 60, SubPT VV 60.482-1
40 CFR Part 60, Subpart VV 60.482-10
40 CFR Part 60, Subpart VV 60.482-4
40 CFR Part 60, Subpart VV 60.482-7
40 CFR Part 60, Subpart VV 60.485
40 CFR Part 60, Subpart VV 60.487
40 CFR Chapter 61, SubChapter C, PT 61, SubPT I 61.112

40 CFR Chapter 61, SubChapter C, PT 61, SubPT V 61.242-1
40 CFR Chapter 61, SubChapter C, PT 61, SubPT V 61.242-11
40 CFR Part 61, Subpart V 61.242-4
40 CFR Part 61, Subpart V 61.242-7
40 CFR Chapter 61, SubChapter C, PT 61, SubPT V 61.245
40 CFR Chapter 61, SubChapter C, PT 61, SubPT V 61.247
40 CFR Chapter 63, SubChapter C, PT 63, SubPT UU 63.1022
40 CFR Chapter 63, SubChapter C, PT 63, SubPT UU 63.1031
40 CFR Chapter 63, SubChapter C, PT 63, SubPT UU 63.1034
40 CFR Chapter 63, SubChapter C, PT 63, SubPT UU 63.1038
40 CFR Chapter 63, SubChapter C, PT 63, SubPT UU 63.1039
40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.162
40 CFR Part 63, Subpart H 63.174
40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.181
40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.182

Description: Failure to properly classify equipment leaks. According to the records reviewed there were instances where equipment leaks were classified as "Repair Delayed" without meeting the applicable Delay of Repair requirements.

Viol. Classification: Moderate

Citation: 30 TAC Chapter 115, SubChapter D 115.352
30 TAC Chapter 115, SubChapter D 115.356
30 TAC Chapter 115, SubChapter H 115.780
40 CFR Chapter 60, SubChapter C, PT 60, SubPT VV 60.482-1
40 CFR Part 60, Subpart VV 60.482-10
40 CFR Part 60, Subpart VV 60.482-4
40 CFR Part 60, Subpart VV 60.482-7
40 CFR Part 60, Subpart VV 60.485
40 CFR Part 60, Subpart VV 60.487
40 CFR Chapter 61, SubChapter C, PT 61, SubPT I 61.112
40 CFR Chapter 61, SubChapter C, PT 61, SubPT V 61.242-1
40 CFR Chapter 61, SubChapter C, PT 61, SubPT V 61.242-11
40 CFR Part 61, Subpart V 61.242-4
40 CFR Part 61, Subpart V 61.242-7
40 CFR Chapter 61, SubChapter C, PT 61, SubPT V 61.245
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40 CFR Chapter 63, SubChapter C, PT 63, SubPT UU 63.1034
40 CFR Chapter 63, SubChapter C, PT 63, SubPT UU 63.1038
40 CFR Chapter 63, SubChapter C, PT 63, SubPT UU 63.1039
40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.162

40 CFR Part 63, Subpart H 63.174
40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.181
40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.182

Description: Failure to identify specific equipment for inclusion in the LDAR program and apply the appropriate regulatory applicability to each component in the LDAR database.

Viol. Classification: Moderate

Citation: 30 TAC Chapter 115, SubChapter D 115.352
30 TAC Chapter 115, SubChapter D 115.356
30 TAC Chapter 115, SubChapter H 115.780
40 CFR Chapter 60, SubChapter C, PT 60, SubPT VV 60.482-1
40 CFR Part 60, Subpart VV 60.482-10
40 CFR Part 60, Subpart VV 60.482-4
40 CFR Part 60, Subpart VV 60.482-7
40 CFR Part 60, Subpart VV 60.485
40 CFR Part 60, Subpart VV 60.487
40 CFR Chapter 61, SubChapter C, PT 61, SubPT I 61.112
40 CFR Chapter 61, SubChapter C, PT 61, SubPT V 61.242-1

40 CFR Chapter 61, SubChapter C, PT 61, SubPT V 61.242-11
40 CFR Part 61, Subpart V 61.242-4
40 CFR Part 61, Subpart V 61.242-7
40 CFR Chapter 61, SubChapter C, PT 61, SubPT V 61.245
40 CFR Chapter 61, SubChapter C, PT 61, SubPT V 61.247
40 CFR Chapter 63, SubChapter C, PT 63, SubPT UU 63.1022
40 CFR Chapter 63, SubChapter C, PT 63, SubPT UU 63.1031
40 CFR Chapter 63, SubChapter C, PT 63, SubPT UU 63.1034
40 CFR Chapter 63, SubChapter C, PT 63, SubPT UU 63.1038
40 CFR Chapter 63, SubChapter C, PT 63, SubPT UU 63.1039
40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.162
40 CFR Part 63, Subpart H 63.174
40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.181

Description: Failure to properly maintain records, specifically: Daily calibration records and LDAR records requiring stream composition data.

Notice of Intent Date: 10/04/2007 (598705)

Disclosure Date: 07/03/2008

Viol. Classification: Minor

Citation: 40 CFR Chapter 136, SubChapter D, PT 136 136.1(b)

Rqmt Prov: PERMIT TPDES0003531

Description: Internal chain-of custodies in the years 2006, 2007 and 2008 were missing required information.

Notice of Intent Date: 10/04/2007 (598710)

Disclosure Date: 07/03/2008

Viol. Classification: Moderate

Rqmt Prov: PERMIT Operating Permit O-2181

Description: Failure to comply with Title V Operating Permit O-2181, Special Condition 31.

Notice of Intent Date: 10/04/2007 (598714)

No DOV Associated

Notice of Intent Date: 04/07/2008 (654966)

No DOV Associated

Notice of Intent Date: 06/18/2008 (688531)

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
EQUISTAR CHEMICALS, LP
RN100542281**

§
§
§
§
§

**BEFORE THE
TEXAS COMMISSION ON
ENVIRONMENTAL QUALITY**

**AGREED ORDER
DOCKET NO. 2009-1593-AIR-E**

I. JURISDICTION AND STIPULATIONS

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

1. The Respondent owns and operates a chemical company at 8280 Sheldon Road, in Channelview, Harris County, Texas (the "Plant").
2. The Plant consists of one or more sources as defined in TEX. HEALTH & SAFETY CODE § 382.003(12).
3. The Commission and the Respondent agree that the Commission has jurisdiction to enter this Agreed Order, and that the Respondent is subject to the Commission's jurisdiction.
4. The Respondent received notice of the violations alleged in Section II ("Allegations") on or about February 11, April 27, May 20, July 22, August 2, August 12 and September 20, 2009.
5. The occurrence of any violation is in dispute and the entry of this Agreed Order shall not constitute an admission by the Respondent of any violation alleged in Section II ("Allegations"), nor of any statute or rule.
6. An administrative penalty in the amount of One Hundred Eleven Thousand Eight Hundred Fifty-Five Dollars (\$111,855) is assessed by the Commission in settlement of the violations alleged in Section II ("Allegations"). On or about January 6, 2009, the Respondent filed a petition for bankruptcy relief pursuant to Chapter 11 of the United States Code now pending in the U.S.

Bankruptcy Court for the Southern District of New York. Debtor remains as a debtor in possession and no trustee or examiner has been appointed. The Automatic Stay imposed by the Federal Bankruptcy Code (specifically, 11 USC § 362(a)) does not apply to the commencement or continuation of an action or proceeding by a governmental unit to enforce such governmental unit's police or regulatory power, by virtue of the exception set out at 11 USC § 362(b)(4). Accordingly, TCEQ (a governmental unit as defined under 11 USC § 101 (27)) is expressly excepted from the automatic stay in pursuing enforcement of the State's Environmental Protection Laws, and in seeking to liquidate its damages for such violations. These violations having been incurred post-petition are entitled to be treated as an administrative expense priority for purposes of the claims hierarchy of payment from the bankruptcy estate. So long as the Debtor's bankruptcy proceedings are pending and/or until relief from the automatic stay is granted, the TCEQ will, however, not seek to execute upon any monetary judgment obtained without first approaching the United States Bankruptcy Court where the Debtor's bankruptcy case is pending as necessary, after consultation with the Office of the Attorney General. Twenty-Two Thousand Three Hundred Seventy Dollars (\$22,370) is deferred contingent upon the Respondent's timely and satisfactory compliance with all the terms of this Agreed Order. Any deferred amount will be waived upon full compliance with the terms of this Agreed Order. If the Respondent fails to timely and satisfactorily comply with all requirements of this Agreed Order, the Executive Director may require the Respondent to pay all or part of the deferred penalty upon approval by the bankruptcy court.

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

II. ALLEGATIONS

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

1. Failed to prevent unauthorized emissions, in violation of 30 TEX. ADMIN. CODE § 116.115(c), TEX. HEALTH & SAFETY CODE § 382.085(b) and Permit No. 2128, Special Condition No. 1, as documented during a record review conducted on July 16, 2009. Specifically, the Respondent released 4,371 pounds ("lbs") of volatile organic compounds ("VOC"), including 1,970 lbs of the Hazardous Air Pollutant ("HAP") 1,3-butadiene from Tank 6 in the East Plant Tank Farm during

- an avoidable emissions event (Incident No. 125702) that began June 17, 2009 and lasted four minutes. A two inch vent nozzle became plugged resulting in an increase in pressure in Tank 6. The Respondent was unable to detect the rise in pressure in Tank 6 until a pressure safety valve released the emissions to the atmosphere. Since this emissions event could have been avoided by better maintenance practices and the final report was incomplete, the demonstrations in 30 TEX. ADMIN. CODE § 101.222 necessary to present an affirmative defense were not met.
2. Failed to submit an administratively complete and accurate final report for Incident No. 125702, in violation of 30 TEX. ADMIN. CODE § 101.201(b)(1)(H) and TEX. HEALTH & SAFETY CODE § 382.085(b), as documented during a record review conducted on July 16, 2009. Specifically, the final report submitted on June 30, 2009 did not include the permit number for the facility that experienced the upset.
 3. Failed to prevent unauthorized emissions, in violation of 30 TEX. ADMIN. CODE § 116.115(c), TEX. HEALTH & SAFETY CODE § 382.085(b) and Permit No. 2933, Special Condition No. 1, as documented during a record review conducted on May 4 through 28, 2009. Specifically, the Respondent released 967.37 lbs of carbon monoxide ("CO"), 612 lbs of the highly reactive VOC ("HRVOC") ethylene, and 93.2 lbs of nitrogen oxides ("NOx") during an avoidable emissions event (Incident No. 122734) that began April 13, 2009 and lasted six hours. The deethanizer pressure control valve ("DPCV"), PV-46060, failed to control the tower pressure during an acetylene converter upset and operators were not trained to put the DPCV, PV-46011, in manual mode and close the it before reestablishing air to the valve. Since this emissions event could have been avoided by better operational practices, the demonstrations in 30 TEX. ADMIN. CODE § 101.222 necessary to present an affirmative defense were not met.
 4. Failed to prevent unauthorized emissions, in violation of 30 TEX. ADMIN. CODE § 116.115(c), TEX. HEALTH & SAFETY CODE § 382.085(b) and Permit No. 6387, Special Condition No. 3, as documented during a record review conducted on February 17 through 23, 2009. Specifically, the Respondent released 6,876 lbs of VOCs, including 3,414 lbs of HRVOCs, from Vessel D-1217 in the Methyl Tertiary Butyl Ether Unit during an avoidable emissions event (Incident No. 118631) that began January 8, 2009 and lasted one hour and 30 minutes. The emissions were the result of a liquid filled line being isolated on both ends without proper thermal expansion relief and with used gaskets. Since this emissions event could have been avoided by better operational and maintenance practices, the demonstrations in 30 TEX. ADMIN. CODE § 101.222 necessary to present an affirmative defense were not met.
 5. Failed to prevent unauthorized emissions and exceeded the 1,200 lbs per hour ("lbs/hr") emission limit for HRVOCs, in violation of 30 TEX. ADMIN. CODE §§ 115.722(c)(2) and 116.115(c), TEX. HEALTH & SAFETY CODE § 382.085(b) and Permit No. 1768, Special Condition No. 1, as documented during an investigation conducted on January 9, 2009. Specifically, the Respondent released 6,133 lbs of VOCs, including 5,611 lbs of HRVOCs, 5,502 lbs of CO, and 642 lbs of NOx from the OP1 Flare, emission point number ("EPN") 38E01, in the Olefins 1 Unit during an avoidable emissions event (Incident No. 118546) that began January 7, 2009 and lasted three hours and 50 minutes. The emissions were the result of the plugging of a tube in the compressor and a subsequent loss of steam that caused the compressor to shutdown and the OP1 Flare to vent. Since this emissions event could have been avoided by better maintenance and operational practices and was improperly reported, the demonstrations in 30 TEX. ADMIN. CODE § 101.222 necessary to present an affirmative defense were not met.

6. Failed to report the estimated total quantities for the compounds released during Incident No. 118546 in the final emissions event report, in violation of 30 TEX. ADMIN. CODE § 101.201(b)(1)(H) and TEX. HEALTH & SAFETY CODE § 382.085(b), as documented during an investigation conducted on January 9, 2009. Specifically, the Respondent reported only the amount of contaminants that were over the permitted limit, instead of the total amount of contaminants emitted.
7. Failed to comply with the hourly emission limit of 1.65 lbs/hr for VOCs and 0.14 lbs/hr for 1,3 butadiene intermittently from January 6, 2009 (the date the bankruptcy petition was filed) to present, in violation of 30 TEX. ADMIN. CODE §§ 116.115(c) and 122.143(4), TEX. HEALTH & SAFETY CODE § 382.085(b), Federal Operating Permit ("FOP") No. O-02184, Special Condition No. 18 and Permit No. 2128, Special Condition No. 1, and as documented during a record review conducted on July 9, 2009. Specifically, emissions from Regeneration Vent, EPN 3E05, for Reactors R-309 A, R-309 B, and R-309 C, exceeded permitted limits as documented by the results of sampling conducted for six one-hour samples per reactor on December 11 through 12, 2005 and December 31, 2005 and an update provided on May 26, 2009 that emission exceedances are ongoing. Rates ranged from 1.76 lbs/hr to 9.28 lbs/hr of VOCs over 35 hours and 0.16 lbs/hr to 0.31 lbs/hr of 1,3 butadiene over 27 hours and total emissions through May 26, 2009 were reported to be 7,236 lbs of VOCs and 64.7 lbs of 1,3 butadiene.
8. Failed to equip the gauge float wells with bolts or fasteners on the covers of the roof openings of Tanks 3111A, 3111B, and 3113, to ensure that the openings are air tight, in violation of 30 TEX. ADMIN. CODE § 122.143(4), TEX. HEALTH & SAFETY CODE § 382.085(b), FOP No. O-02182, Special Condition No. 1.A., and 40 FEDERAL CODE OF REGULATIONS ("CFR") § 63.119(b)(6), as documented during a record review conducted on July 14, 2009.

III. DENIALS

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

IV. ORDERING PROVISIONS

1. It is, therefore, ordered by the TCEQ that the Respondent be assessed an administrative penalty as set forth in Section I, Paragraph 6 above. The assessment of this administrative penalty and the Respondent's compliance with all the terms and conditions set forth in this Agreed Order resolve only the allegations in Section II. However, the agreement by the Respondent to the assessment of a penalty is expressly not in lieu of or an alternative to compliance with all injunctive requirements in this Agreed Order. The Commission shall not be constrained in any manner from requiring corrective action or penalties for violations which are not raised here. Administrative penalty payments when paid shall be made payable to "TCEQ" and sent with the notation "Re: Equistar Chemicals, LP, Docket No. 2009-1593-AIR-E" to:

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

2. It is further ordered that the Respondent shall undertake the following technical requirements:
 - a. Within 30 days after the effective date of this Agreed Order:
 - i. Implement measures designed to ensure the proper maintenance of vent lines and nozzles in order to prevent the reoccurrence of emissions due to the same causes as that of Incident No. 125702;
 - ii. Implement a proper training program for operators in the event of upset conditions in order to prevent the reoccurrence of emissions due to the same causes as that of Incident No. 122734;
 - iii. Implement measures designed to ensure that proper thermal expansion relief and new gaskets are in place when isolating liquid filled lines nozzles in order to prevent the reoccurrence of emissions due to the same causes as that of Incident No. 118631;
 - iv. Implement measures designed to prevent tubes in the compressor from plugging when changing filters and causing the compressor to shutdown due to a loss of steam in order to prevent the reoccurrence of emissions due to the same causes as that of Incident No. 118546;
 - v. Install bolts or fasteners on the covers of the roof openings of Tanks 3111A, 3111B, and 3113, in accordance with 40 CFR § 63.119(b);
 - vi. Implement measures designed to ensure the proper reporting of emissions events;
 - b. Within 45 days after the effective date of this Agreed Order, submit written certification to demonstrate compliance with Ordering Provision No. 2.a., as described in Ordering Provision No. 2.e.;
 - c. Within 180 days after the effective date of this Agreed Order:
 - i. Install a thermal oxidizer to minimize emissions from the Regeneration Vent;
 - ii. Obtain a permit amendment to Permit No. 2128 that amends the emission limits to more accurately reflect operation of the Reactors associated to the Regeneration Vent;
 - d. Within 195 days after the effective date of this Agreed Order, submit written certification to demonstrate compliance with Ordering Provision No. 2.c., as described in Ordering Provision No. 2.e.; and
 - e. The certifications required in Ordering Provision Nos. 2.b and 2.d. shall be notarized by a State of Texas Notary Public and contain the following language:

"I certify under penalty of law that I have personally examined and am familiar with the information submitted and all attached documents, and that based on my inquiry of those

individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fines and imprisonment for knowing violations."

The certification shall be submitted to:

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

with a copy to:

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

3. The provisions of this Agreed Order shall apply to and be binding upon the Respondent. The Respondent is ordered to give notice of the Agreed Order to personnel who maintain day-to-day control over the Plant operations referenced in this Agreed Order.
4. If the Respondent fails to comply with any of the Ordering Provisions in this Agreed Order within the prescribed schedules, and that failure is caused solely by an act of God, war, strike, riot, or other catastrophe, the Respondent's failure to comply is not a violation of this Agreed Order. The Respondent shall have the burden of establishing to the Executive Director's satisfaction that such an event has occurred. The Respondent shall notify the Executive Director within seven days after the Respondent becomes aware of a delaying event and shall take all reasonable measures to mitigate and minimize any delay.
5. The Executive Director may grant an extension of any deadline in this Agreed Order or in any plan, report, or other document submitted pursuant to this Agreed Order, upon a written and substantiated showing of good cause. All requests for extensions by the Respondent shall be made in writing to the Executive Director. Extensions are not effective until the Respondent receives written approval from the Executive Director. The determination of what constitutes good cause rests solely with the Executive Director.
6. This Agreed Order, issued by the Commission, shall not be admissible against the Respondent in a civil proceeding, unless the proceeding is brought by the OAG to: (1) enforce the terms of this Agreed Order; or (2) pursue violations of a statute within the Commission's jurisdiction, or of a rule adopted or an order or permit issued by the Commission under such a statute.
7. This 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.

8. Under 30 TEX. ADMIN. CODE § 70.10(b), the effective date is the date of hand-delivery of the Order to the Respondent, or three days after the date on which the Commission mails notice of the Order to the Respondent, whichever is earlier. The Chief Clerk shall provide a copy of this Agreed Order to each of the parties.

SIGNATURE PAGE

TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

For the Commission

John Szellin

For the Executive Director

4/23/2010
Date

I, the undersigned, have read and understand the attached Agreed Order. I am authorized to agree to the attached Agreed Order on behalf of the entity indicated below my signature, and I do agree to the terms and conditions specified therein. I further acknowledge that the TCEQ is materially relying on such representation.

I also understand that failure to comply with the Ordering Provisions, if any, in this order 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;
- 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.

Michael VanDerSnick
Signature

3-15-10
Date

Michael VanDerSnick
Name (Printed or typed)
Authorized Representative of
Equistar Chemicals, LP

Site Manager
Title

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