

Bryan W. Shaw, Ph.D., *Chairman*
Buddy Garcia, *Commissioner*
Carlos Rubinstein, *Commissioner*
Mark R. Vickery, P.G., *Executive Director*



TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

Protecting Texas by Reducing and Preventing Pollution

September 21, 2010

LaDonna Castañuela
Office of the Chief Clerk
Texas Commission on Environmental Quality
Office of the Chief Clerk, MC-105
P.O. Box 13087
Austin, Texas 78711-3087

Re: Second Set of Agenda Backup Documents, Abitibi-Consolidated Corp. Permit No. 8068 and PSD-TX-437; TCEQ Docket No. 2010-1308-AIR

Dear Ms. Castañuela:

Although the original set (original and seven copies) of the Agenda backup documents for the above referenced matter was filed on Friday, September 3, 2010, at your request please find a second set of eight copies for your file.

If you have any questions, please call me at 239- 6033.

Sincerely,

A handwritten signature in cursive script that reads "Erin Selvera".

Erin Selvera
Staff Attorney
Environmental Law Division

Enclosures

SPECIAL CONDITIONS

Permit Numbers 8068 and PSDTX437

EMISSION STANDARDS AND FUEL SPECIFICATIONS

1. This permit covers only those sources of emissions listed in the attached table entitled "Emission Sources - Maximum Allowable Emission Rates," and those sources are limited to the emission limits and other conditions specified in that attached table.
2. A. The following facilities, as represented by the applicant, shall comply with all requirements of the U.S. Environmental Protection Agency (EPA) regulations in Title 40 Code of Federal Regulations Part 60 (40 CFR Part 60), Subparts A and BB on Standards of Performance for New Stationary Sources promulgated for Kraft Pulp Mills in Lime Kiln, Recovery Furnace, Smelt Tank, and Batch Digesters. **(10/00)**
- B. Where applicable, the facilities shall comply with the requirements of 40 CFR Part 63, National Emission Standards for Hazardous Air Pollutants (NESHAPS), Subpart S, NESHAPS for the Pulp and Paper Industry; Subpart MM, NESHAPS for Chemical Recovery Combustion Sources at Kraft, Soda, Sulfite, and Stand-Alone Semi chemical Pulp Mills; and Subpart DDDDD, Maximum Achievable Control Technology (MACT) Standard for Industrial, Commercial, and Institutional Boilers. **(11/05)**

OPERATIONAL LIMITATIONS AND WORK PRACTICES

3. The following representations have been made by the applicant:
 - A. The chemicals used for sodium makeup in the recovery boiler will be limited to 15 gallons per minute and the following maximum compositions:

Sodium Formate	25 percent
Pentaerythritol (pe)	8 percent
Pe Cyclic Monoformal	8 percent
Sodium Acetate	5 percent
Sodium Chloride	2 percent
Sodium Sulfate	2 percent
Dipentaerythritol	2 percent
Miscellaneous Organics*	20 percent
Formaldehyde	70 parts per million (ppm)

* These organics are limited to the compounds normally found in the sodium makeup additive.

SPECIAL CONDITIONS

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When venting occurs from EPN 89-1, the following information shall be recorded and made immediately available upon request: flow in standard cubic feet per second, start and stop time to nearest second, and calculated emissions of the following pollutants based on the most current average of all sample analyses and concentration of all sulfur compounds (including total reduced sulfur [TRS]), total and speciated volatile organic compounds (VOC), all hazardous air pollutant (HAP) compounds, and carbon monoxide (CO). (11/05)

8. The holder of this permit shall perform stack sampling (grab sample - canister, tedlar bag, etc.) and other testing as required to establish the actual pattern and quantities of air contaminants being emitted into the atmosphere from (but not limited to) the Blow Heat Recovery System (EPN 89-1). The holder of this permit is responsible for providing sampling and testing facilities and conducting the sampling and testing operations at the holder's expense.
 - A. The TCEQ Beaumont Regional Office shall be contacted as soon as testing is scheduled but not less than 45 days prior to testing/sampling to schedule a pretest meeting.

The notice shall include:

- (1) Date for pretest meeting.
- (2) Date sampling will occur.
- (3) Name of firm conducting sampling.
- (4) Type of sampling equipment to be used.
- (5) Method or procedure to be used in sampling.

The purpose of the pretest meeting is to review the necessary sampling and testing/sampling procedures, to provide the proper data forms for recording pertinent data, and to review the format procedures for submitting the test reports.

A written proposed description of any deviation from testing/sampling procedures specified in permit conditions or TCEQ or EPA sampling procedures shall be made available to the TCEQ prior to the pretest meeting. The TCEQ Regional Director shall approve or disapprove of any deviation from specified sampling procedures.

Requests to waive testing for any pollutant specified in Paragraph B of this condition shall be submitted to the TCEQ Office of Permitting and Registration, Air Permits Division and to the TCEQ Beaumont Regional Office. Test waivers and alternate/equivalent procedure proposals for New Source Performance Standards testing which must have EPA approval shall be submitted to the TCEQ Beaumont Regional Office.

SPECIAL CONDITIONS

Permit Numbers 8068 and PSDTX437

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The reports shall be distributed as follows:

One copy to the EPA Dallas Region 6 Office.

One copy to the TCEQ Beaumont Regional Office. (11/05)

CONTEMPORANEOUS REDUCTIONS

9. In order to ensure compliance with the represented emission rates that were used in the prevention of significant deterioration (PSD) netting analysis for the Kraft Mill Expansion Project, natural gas consumption in the Nos. 4, 5, 8, and 9 Power Boilers (permitted under Voluntary Emissions Reduction Program Number 56263) shall be limited to 4,803 million standard cubic feet per year. (11/05)
10. Recovery Boiler Nos. 6 and 10 have been shut down as part of the Kraft Mill Expansion Project and the resulting emission reductions applied to the PSD netting. The Nos. 1, 3, and 4 Paper Machines will be shut down as part of the No. 8 Paper Machine Project. (10/00)
11. Paper Machine Nos. 1, 3, and 4 will be shut down within 225 days after the start-up of the No. 8 Paper Machine and the resulting emission reductions applied to the PSD netting. (8/99)

RECORDKEEPING REQUIREMENTS

12. Records shall be maintained to demonstrate compliance with the fiscal monthly average anthraquinone limitation. (4/99)
13. For the Recovery Boiler (Emission Point No. 81-1), Abitibi Consolidated Corporation shall calculate and record on a daily basis 12-hour average SO₂ concentrations for the two consecutive periods of each operating day. Each 12-hour average shall be determined as the arithmetic mean of the appropriate 12 contiguous one-hour average SO₂ concentrations from the continuous emissions monitor. (8/99)
14. Records shall be maintained to show the composition and feed rate of the sodium makeup in the recovery boiler. Records shall be based on a fiscal monthly average. (4/99)
15. Compliance with the pulp production limit shall be demonstrated by calculating an average daily production of pulp based on a fiscal monthly total. (4/99)

SPECIAL CONDITIONS

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whether the source continued to be carried in the state's emissions inventory during the shutdown; a demonstration that the shutdown was not considered as a decrease in a netting calculation. In addition, the permit holder shall note that the allowable emissions level as of the date of shutdown cannot increase upon reactivation, while the baseline actual emissions may be zero.

No facilities shall be restarted until receipt of written approval of the TCEQ Air Permits Division's review of the analysis. **(Date)**

Dated

EMISSION SOURCES - MAXIMUM ALLOWABLE EMISSION RATES

Permit Numbers 8068 and PSDTX437

This table lists the maximum allowable emission rates and all sources of air contaminants on the applicant's property covered by this permit. The emission rates shown are those derived from information submitted as part of the application for permit and are the maximum rates allowed for these facilities. Any proposed increase in emission rates may require an application for a modification of the facilities covered by this permit.

AIR CONTAMINANTS DATA

Emission Point No. (1)	Source Name (2)	Air Contaminant Name (3)	Emission Rates *	
			lb/hr	TPY
79-1	Lime Kiln Scrubber (5)	PM ₁₀	22.70	96.7
		NO _x	22.70	96.7
		CO	22.90	97.6
		VOC	7.50	32.0
		SO ₂	5.40	23.0
		TRS	0.90	3.8
79-2	Slaker (5)	PM ₁₀	0.50	2.2
		TRS	0.10	0.3
		VOC	0.30	1.3
79-3	Lime Blower (5)	PM ₁₀	0.40	1.7
79-4	Mud Filter Pump (5)	PM ₁₀	0.50	2.2
		VOC	0.26	1.1
79-5	Mud Filter Hood (5)	PM ₁₀	0.50	2.2
		VOC	0.23	1.0
79-6	Causticizer Tanks (5)	PM ₁₀	0.50	2.2
		VOC	0.07	0.3
81-1	Recovery Boiler (6)	PM ₁₀	50.50	218.1
		NO _x	55.00	237.6
		CO	112.50	486.0
		VOC	20.27	88.8
		SO ₂	206.00	890.0
		TRS	2.70	11.8
		H ₂ SO ₄	4.60	20.0

EMISSION SOURCES - MAXIMUM ALLOWABLE EMISSION RATES

AIR CONTAMINANTS DATA

Emission Point No. (1)	Source Name (2)	Air Contaminant Name (3)	Emission Rates *	
			lb/hr	TPY
BPLT	Bleach Plant	VOC	7.13	31.3
		Chlorine	2.76	12.1
GLCS	Green Liquor Clarification and Storage	VOC	1.46	6.4
LMCS	Lime Mud Clarification and Storage	VOC	0.66	2.9
		TRS	0.02	<0.1
WLCS	White Liquor Clarification and Storage	VOC	0.22	1.0
SRS	Soap Recovery and Storage	VOC	0.08	0.4
		TRS	0.05	0.3
WBLS	Weak Black Liquor Storage	VOC	0.10	0.5
		TRS	0.06	0.3
HBLS	Heavy Black Liquor Storage	VOC	0.18	0.8
		TRS	0.18	0.8
BRKPS	Brown Kraft Pulp Storage	VOC	0.86	3.8
		TRS	0.18	0.8
BLKPS	Bleached Kraft Pulp Storage	VOC	0.86	3.8
		TRS	0.18	0.8
MS	Misc. Storage	VOC	0.06	0.3
		TRS	0.04	0.2
WDYD	Woodyard	PM ₁₀	8.75	38.4

Permit Renewal Source Analysis & Technical Review

Company	Abitibi-consolidated Corp	Permit Number	8068/PSDTX437
City	Lufkin	Project Number	65576
County	Angelina	Account Number	AC-0017-B
Project Type	Renewal	Regulated Entity Number	RN100220110
Project Reviewer	Mr. Patrick Agumadu, P.E.	Customer Reference Number	CN600615744
Site Name	Lufkin Pulp And Paper Mill	GW#:	382311

Project Overview

Abitibi Consolidated Corporation (previously known as Donohue Industries) had applied for the renewal of its permit on June 1, 1998 to authorize the continued operation of the Pulp & Paper Plant on Highway 103 East Lufkin, Angelina County, Texas.

On December 18, 2000, Abitibi also applied to the TCEQ for modification of its existing Pulp & Paper Mill, in Lufkin, Angelina County. This modification request which was declared administratively complete on May 14, 2001 would authorize the applicant to represent emissions from its Blowheat Recovery System released when pressure from water seal exceeds 3.5 psig as permitted instead of representing such emissions as upset as previously done by Abitibi. The Blowheat Recovery System in the plant includes an accumulator which is equipped with a water seal set at approximately 3.5 psig to prevent tank and equipment ruptures. A number of events can result in the loss of the water seal, such as atmospheric pressure and temperature changes, upsets in the digester cooking systems which result in cooking too long or not long enough, instrument malfunctions that monitor pressures in the system, and changes in the control set points. Abitibi contended that emissions from this water seal are upset emissions and had recorded them as per the instructions of 30 TAC 101.201 and 101.211. The Texas Commission On Environmental Quality (TCEQ) Beaumont Regional Office concluded in its SIP inspection conducted on February 2000 that even if the emissions are unpredictable, the frequency of occurrence make them part of "normal" operations and that the emissions be permitted. The company disagreed with Region's conclusion but submitted amendment application as part of an Agreed Order dated June 5, 2001 to authorize the emissions. Because the emission could not be easily quantified, Abitibi decided to apply 2 percent of the operating hours of the digester to determine the emissions.

During a combined public notice (PN) for the renewal and amendment, requests for hearing and public meeting were received by TCEQ from some concerned citizens due to the fact that the applicant represented increase in emissions initially. Abitibi withdrew the amendment after showing that there would be no increase in emissions from the Blowheat Recovery System. The blown seals were addressed under Startup, Shutdown, and Malfunction (SSM) plan and permit was altered on November 16, 2005 to reflect this.

This permit was amended in 1999 to add new Paper Machines and phase out Paper machine Nos. 1, 3, and 4 thereby establishing new emission levels. The permit was later amended in 2000 to automate the digester capping valves and increase the throughput of the groundwood mill and another new emission levels were established. The total annual emissions as of 2005 (following permit alteration) are as follows: 684.40 tons per year (tpy) of particulate matter including particulate matter less than 10 microns in diameter (PM/PM₁₀); 1,837.90 tpy of volatile organic compound (VOC); 1,209.30 tpy of nitrogen oxide (NO_x); 1,447.40 tpy of carbon monoxide (CO); 948.10 tpy of sulfur dioxide (SO₂); 68.20 tpy of total reduced sulfur (TRS); 21.0 tpy of sulfuric acid (H₂SO₄); and 12.1 tpy of chlorine (Cl₂). The 2005 emission levels now serve as the current emission levels for this permit. Comparison of the 1999, 2000 and 2005 (also current allowables) annual emissions is shown on the table below:

Permit Renewal
Source Analysis & Technical Review

Permit No. 8068/PSDTX437

Regulated Entity No. RN100220110

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GW#: 382311

Rule Citation	Requirement	
	Small Business Source?	No
	Date Leg Letters mailed:	05/14/01
39.603	Date Published:	05/30/01
	Publication Name:	<i>The Lufkin Daily News</i>
	Pollutants:	PM, VOC, NO _x , CO, SO ₂ , Cl ₂ , ClO, TRS
	Date Affidavits/Copies Received:	06/12/01
	Is bilingual notice required?	Yes
	Language:	Spanish
	Date Published:	05/31/01
	Publication Name:	<i>La Lengua</i>
	Date Affidavits/Copies Received:	06/12/01
	Date Certification of Sign Posting / Application Availability Received:	07/09/01
39.604	Public Comments Received?	Yes
	Hearing Requested?	Yes
	Meeting Request?	Yes
	Date Meeting Held:	None
	Date Response to Comments sent to OCC:	
	Request(s) withdrawn?	No
	Date Withdrawn:	N/A
	Consideration of Comments:	
	Is 2nd Public Notice required?	Yes
39.419	Date 2nd Public Notice Mailed:	11/05/01
	Preliminary Determination:	Issue
39.603	Date Published:	12/05/01
	Publication Name:	<i>The Lufkin Daily News</i>
	Pollutants:	PM, VOC, NO _x , CO, SO ₂ , Cl ₂ , ClO, TRS
	Date Affidavits/Copies Received:	12/09/01
	Is bilingual notice required?	Yes
	Language:	Spanish
	Date Published:	12/19/01
	Publication Name:	<i>La Lengua</i>
	Date Affidavits/Copies Received:	12/19/01
	Date Certification of Sign Posting / Application Availability Received:	12/19/01
	Public Comments Received?	Yes
	Meeting Request?	Yes
	Date Meeting Held:	None
	Hearing Request?	Yes
	Date Hearing Held:	
	Request(s) withdrawn?	No

Permit Renewal
Source Analysis & Technical Review

Permit No. 8068/PSDTX437

Regulated Entity No. RN100220110

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GW#: 382311

Request for Comments

Received From	Program/Area Name	Reviewed By	Comments
Region:	10	Anthony McLaughlin	OK
City:	Lufkin		
County:	Angelina		
Toxicology:			
Compliance:			
Legal:	Austin	Tim Eubank	Ok'd RTC
Comment resolution and/or unresolved issues:			

Process/Project Description

This is a paper mill that manufactures pulp for the production of newsprint and specialty paper products. It utilizes a groundwood (mechanical) process and a Kraft (chemical) process. The digesters are part of the early kraft processing, where chips are placed in a sealed vessel and a cooking liquor is added. The ligands are dissolved and the fibers are sent forward in the process. The VOCs generated in this part of the process are sent to the lime kiln for destruction, and will soon be sent to an incinerator. The groundwood mill is a process in which blocks of wood are ground between a plate and a grindstone to mechanically form a pulp. A large amount of VOCs are generated here and sent up through a stack and escape as fugitives.

Pollution Prevention, Sources, Controls and RACT- [30 TAC 116.311(b)(2)]

The digesters are controlled by venting the off-gases to a combustion device, a lime kiln and an incinerator. The incinerator is the main control device while the kiln serves as a back-up. This meets the MACT standard requirements. The groundwood mill is uncontrolled, which is standard control throughout the industry. However, under cluster rules, the Applicant installed a scrubber under Standard Permit No. 41396 to collect some of the fugitive emissions. The power boiler is equipped with a multi-clone and a wet scrubber. The bleach plant is also equipped with a scrubber. The controls still in use to minimize emissions by these facilities meet the Reasonable Available Control Technology (RACT).

Permit Concurrence and Related Authorization Actions

Is the applicant in agreement with special conditions?	Yes
Company representative(s):	Chad Nerren
Contacted Via:	Email
Date of contact:	04/01/09
Other permit(s) or permits by rule affected by this action:	None
List permit and/or PBR number(s) and actions required or taken:	N/A

Project Reviewer	Date	Team Leader/Section Manager/Backup	Date
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Compliance History Report

Customer/Respondent/Owner-Operator: CN600615744 Abitibi-Consolidated Corp. Classification: AVERAGE Rating: 0.76
 Regulated Entity: RN100220110 ABITIBI CONSOLIDATED CORP Classification: AVERAGE Site Rating: 0.78
 LUFKIN TEXAS DIVISION

ID Number(s):	AIR OPERATING PERMITS	ACCOUNT NUMBER	AC0017B
	AIR OPERATING PERMITS	PERMIT	1622
	INDUSTRIAL AND HAZARDOUS WASTE	EPA ID	TXD087716122
	INDUSTRIAL AND HAZARDOUS WASTE	SOLID WASTE REGISTRATION #	30993
		(SWR)	
	VOLUNTARY CLEANUP PROGRAM	ID NUMBER	2295
	WASTEWATER	PERMIT	WQ0000368000
	WASTEWATER	EPA ID	TX0001643
	AIR NEW SOURCE PERMITS	REGISTRATION	15496
	AIR NEW SOURCE PERMITS	PERMIT	8068
	AIR NEW SOURCE PERMITS	REGISTRATION	22946
	AIR NEW SOURCE PERMITS	REGISTRATION	23313
	AIR NEW SOURCE PERMITS	REGISTRATION	22641
	AIR NEW SOURCE PERMITS	REGISTRATION	37765
	AIR NEW SOURCE PERMITS	REGISTRATION	41396
	AIR NEW SOURCE PERMITS	REGISTRATION	42603
	AIR NEW SOURCE PERMITS	REGISTRATION	46960
	AIR NEW SOURCE PERMITS	REGISTRATION	47350
	AIR NEW SOURCE PERMITS	ACCOUNT NUMBER	AC0017B
	AIR NEW SOURCE PERMITS	REGISTRATION	52709
	AIR NEW SOURCE PERMITS	EPA ID	PSDTX437
	AIR NEW SOURCE PERMITS	AFS NUM	4800500003
	AIR NEW SOURCE PERMITS	PERMIT	56262
	AIR NEW SOURCE PERMITS	PERMIT	56263
	AIR NEW SOURCE PERMITS	REGISTRATION	75008
	AIR NEW SOURCE PERMITS	REGISTRATION	51447
	PETROLEUM STORAGE TANK	REGISTRATION	12682
	REGISTRATION		
	WASTEWATER LICENSING	LICENSE	WQ0000368000
	AIR EMISSIONS INVENTORY	ACCOUNT NUMBER	AC0017B

Location: 3201 ATKINSON DR, LUFKIN, TX, 75901

TCEQ Region: REGION 10 - BEAUMONT

Date Compliance History Prepared: August 26, 2010

Agency Decision Requiring Compliance History: Enforcement

Compliance Period: September 01, 1998 to August 31, 2003

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

Name: Staff Name Phone: 239 - 1000

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? Yes
3. If Yes, who is the current owner/operator? OWNOPR Abitibi-Consolidated Corp.
4. If Yes, who was/were the prior owner(s)/operator(s)? OWNOPR Abitibi-Consolidated Corp.
5. When did the change(s) in owner or operator occur? 07/16/2003 OWNOPR Abitibi-Consolidated Corp.
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.
- B. Any criminal convictions of the state of Texas and the federal government.
N/A

56 06/20/2001 (154741)
 57 06/27/2001 (96252)
 58 06/27/2001 (96253)
 59 07/20/2001 (154745)
 60 07/23/2001 (96254)
 61 08/14/2001 (96255)
 62 08/17/2001 (154748)
 63 08/31/2001 (96256)
 64 09/10/2001 (96257)
 65 09/19/2001 (154751)
 66 09/25/2001 (96258)
 67 10/19/2001 (154754)
 68 10/26/2001 (96259)
 69 11/20/2001 (154758)
 70 12/05/2001 (96260)
 71 12/18/2001 (154762)
 72 12/20/2001 (96261)
 73 01/22/2002 (154766)
 74 01/25/2002 (96262)
 75 02/21/2002 (154726)
 76 03/19/2002 (154729)
 77 03/27/2002 (96263)
 78 04/16/2002 (96264)
 79 04/16/2002 (96265)
 80 04/19/2002 (154734)
 81 05/21/2002 (154738)
 82 06/13/2002 (96266)
 83 06/19/2002 (154742)
 84 06/24/2002 (96267)
 85 07/19/2002 (154746)
 86 08/19/2002 (154749)
 87 08/21/2002 (8330)
 88 08/21/2002 (8576)
 89 08/23/2002 (7532)
 90 09/19/2002 (154752)
 91 10/17/2002 (154755)
 92 11/15/2002 (16282)
 93 11/18/2002 (154759)
 94 12/19/2002 (154763)
 95 01/17/2003 (154767)
 96 02/20/2003 (154727)
 97 03/20/2003 (154730)
 98 04/11/2003 (154735)
 99 05/20/2003 (154739)
 100 06/18/2003 (112386)
 101 06/23/2003 (154743)
 102 07/02/2003 (112369)
 103 07/18/2003 (294080)
 104 08/18/2003 (294082)

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

Date: 10/13/1999 (143558) CN600615744
 Self Report? NO Classification: Moderate
 Citation: 30 TAC Chapter 305, SubChapter F 305.125(1)
 30 TAC Chapter 305, SubChapter F 305.125(18)
 Description: Failure to submit 4th progress report.
 Date: 11/30/1999 (154764) CN600615744
 Self Report? YES Classification: Moderate
 Citation: 30 TAC Chapter 305, SubChapter F 305.125(1)
 TWC Chapter 26 26.121(a)

Description: 30 TAC Chapter 101, SubChapter A 101.20(1)
 OPACITY LIMIT
 Self Report? NO Classification: Moderate
 Citation: 30 TAC Chapter 111, SubChapter A 111.111(a)(1)(B)
 Description: VISIBLE EMISSIONS
 Self Report? NO Classification: Moderate
 Citation: 30 TAC Chapter 101, SubChapter A 101.6(b)(7)
 Description: CORRECT UPSET
 Date: 12/31/2001 (154766) CN600615744
 Self Report? YES Classification: Moderate
 Citation: 30 TAC Chapter 305, SubChapter F 305.125(1)
 TWC Chapter 26 26.121(a)
 Description: Failure to meet the limit for one or more permit parameter
 Date: 05/31/2002 (154742) CN600615744
 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: 02/28/2003 (154730) CN600615744
 Self Report? YES Classification: Moderate
 Citation: 30 TAC Chapter 305, SubChapter F 305.125(1)
 TWC Chapter 26 26.121(a)
 Description: Failure to meet the limit for one or more permit parameter
 Date: 05/31/2003 (154743) CN600615744
 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

F. Environmental audits.

N/A

G. Type of environmental management systems (EMSs).

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