

Executive Summary – Enforcement Matter – Case No. 58448
The Dow Chemical Company
RN100225945
Docket No. 2019-1485-IWD-E

Order Type:

1660 Agreed Order

Findings Order Justification:

N/A

Media:

IWD

Small Business:

No

Location(s) Where Violation(s) Occurred:

Dow Texas Operations Freeport, 2301 North Brazosport Boulevard, north of Freeport,
Brazoria County

Type of Operation:

Industrial chemical manufacturing plant

Other Significant Matters:

Additional Pending Enforcement Actions: No

Past-Due Penalties: No

Other: N/A

Interested Third-Parties: None

Texas Register Publication Date: April 3, 2020

Comments Received: No

Penalty Information

Total Penalty Assessed: \$28,350

Amount Deferred for Expedited Settlement: \$5,670

Total Paid to General Revenue: \$11,340

Total Due to General Revenue: \$0

Payment Plan: N/A

Supplemental Environmental Project (“SEP”) Conditional Offset: \$11,340

Name of SEP: Friends of the River San Bernard (Third-Party Pre-Approved)

Compliance History Classifications:

Person/CN - High

Site/RN - High

Major Source: Yes

Statutory Limit Adjustment: N/A

Applicable Penalty Policy: April 2014

Investigation Information

Complaint Date(s): N/A

Complaint Information: N/A

Date(s) of Investigation: August 19, 2019

Date(s) of NOE(s): September 12, 2019

Executive Summary – Enforcement Matter – Case No. 58448
The Dow Chemical Company
RN100225945
Docket No. 2019-1485-IWD-E

Violation Information

Failed to comply with permitted effluent limitations for total copper, pH, total suspended solids, and total purgeable halocarbons [30 TEX. ADMIN. CODE § 305.125(1), TEX. WATER CODE § 26.121(a)(1), and Texas Pollutant Discharge Elimination System ("TPDES") Permit No. WQ0000007000, Outfall No. 002, Effluent Limitations and Monitoring Requirements ("ELMR") No. 1; Outfall No. 004, ELMR No. 2; Outfall No. 301, ELMR No. 1; Outfall No. 501, ELMR No. 1; and Outfall No. 701, ELMR No. 1].

Corrective Actions/Technical Requirements

Corrective Action(s) Completed:

N/A

Technical Requirements:

1. The Order will require the Respondent to implement and complete a SEP (see SEP Attachment A).
2. The Order will also require the Respondent to, within 130 days, submit written certification of compliance with the permitted effluent limitations of TPDES Permit No. WQ0000007000.

Contact Information

TCEQ Attorney: N/A

TCEQ Enforcement Coordinator: Harley Hobson, Enforcement Division, Enforcement Team 1, MC 219, (512) 239-1337; Michael Parrish, Enforcement Division, MC 219, (512) 239-2548

TCEQ SEP Coordinator: Stuart Beckley, SEP Coordinator, Enforcement Division, MC 219, (512) 239-3565

Respondent: Rich Wells, Texas Operations Vice President, The Dow Chemical Company, 2301 North Brazosport Boulevard, Freeport, Texas 77541
Fran Quinlan Falcon, Texas Regional Environmental Leader, The Dow Chemical Company, 2301 North Brazosport Boulevard, Freeport, Texas 77541

Respondent's Attorney: N/A



Penalty Calculation Worksheet (PCW)

Policy Revision 4 (April 2014)

PCW Revision March 26, 2014

TCEQ

DATES	Assigned	23-Sep-2019	Screening	1-Oct-2019	EPA Due	5-Dec-2019
	PCW	1-Oct-2019				

RESPONDENT/FACILITY INFORMATION

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

CASE INFORMATION

Enf./Case ID No.	58448	No. of Violations	3
Docket No.	2019-1485-IWD-E	Order Type	1660
Media Program(s)	Water Quality	Government/Non-Profit	No
Multi-Media		Enf. Coordinator	Harley Hobson
		EC's Team	Enforcement Team 1
Admin. Penalty \$ Limit Minimum	\$0	Maximum	\$25,000

Penalty Calculation Section

TOTAL BASE PENALTY (Sum of violation base penalties)	Subtotal 1	\$31,500
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ADJUSTMENTS (+/-) TO SUBTOTAL 1

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

Compliance History	-10.0%	Adjustment	Subtotals 2, 3, & 7	-\$3,150
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Notes: Since the enhancement for five months of self-reported effluent violations, thirteen NOV's with dissimilar violations, six orders containing a denial of liability, and one order without a denial of liability and the reduction for 295 notices of intent to conduct an audit, and 166 disclosures of violations is below zero the adjustment percentage (subtotal 2) defaults to zero.

Reduction for High Performer classification.

Culpability	No	0.0%	Enhancement	Subtotal 4	\$0
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Notes: The Respondent does not meet the culpability criteria.

Good Faith Effort to Comply Total Adjustments	Subtotal 5	\$0
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Economic Benefit	0.0% Enhancement*	Subtotal 6	\$0
Total EB Amounts	\$5,397		
Estimated Cost of Compliance	\$50,000		
	*Capped at the Total EB \$ Amount		

SUM OF SUBTOTALS 1-7	Final Subtotal	\$28,350
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OTHER FACTORS AS JUSTICE MAY REQUIRE	0.0%	Adjustment	\$0
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Reduces or enhances the Final Subtotal by the indicated percentage.

Notes:

Final Penalty Amount	\$28,350
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STATUTORY LIMIT ADJUSTMENT	Final Assessed Penalty	\$28,350
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DEFERRAL	20.0%	Reduction	Adjustment	-\$5,670
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Reduces the Final Assessed Penalty by the indicated percentage.

Notes:

Deferral offered for expedited settlement.

PAYABLE PENALTY	\$22,680
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Screening Date 1-Oct-2019

Docket No. 2019-1485-IWD-E

PCW

Respondent The Dow Chemical Company

Policy Revision 4 (April 2014)

Case ID No. 58448

PCW Revision March 26, 2014

Reg. Ent. Reference No. RN100225945

Media Water Quality

Enf. Coordinator Harley Hobson

Compliance History Worksheet

>> Compliance History Site Enhancement (Subtotal 2)

Component	Number of...	Number	Adjust.
NOVs	Written notices of violation ("NOVs") with same or similar violations as those in the current enforcement action (<i>number of NOVs meeting criteria</i>)	5	25%
	Other written NOVs	13	26%
Orders	Any agreed final enforcement orders containing a denial of liability (<i>number of orders meeting criteria</i>)	6	120%
	Any adjudicated final enforcement orders, agreed final enforcement orders without a denial of liability, or default orders of this state or the federal government, or any final prohibitory emergency orders issued by the commission	1	25%
Judgments and Consent Decrees	Any non-adjudicated final court judgments or consent decrees containing a denial of liability of this state or the federal government (<i>number of judgments or consent decrees meeting criteria</i>)	0	0%
	Any adjudicated final court judgments and default judgments, or non-adjudicated final court judgments or consent decrees without a denial of liability, of this state or the federal government	0	0%
Convictions	Any criminal convictions of this state or the federal government (<i>number of counts</i>)	0	0%
Emissions	Chronic excessive emissions events (<i>number of events</i>)	0	0%
Audits	Letters notifying the executive director of an intended audit conducted under the Texas Environmental, Health, and Safety Audit Privilege Act, 74th Legislature, 1995 (<i>number of audits for which notices were submitted</i>)	295	-295%
	Disclosures of violations under the Texas Environmental, Health, and Safety Audit Privilege Act, 74th Legislature, 1995 (<i>number of audits for which violations were disclosed</i>)	166	-332%
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) 0%

>> Repeat Violator (Subtotal 3)

No

Adjustment Percentage (Subtotal 3) 0%

>> Compliance History Person Classification (Subtotal 7)

High Performer

Adjustment Percentage (Subtotal 7) -10%

>> Compliance History Summary

Compliance History Notes

Since the enhancement for five months of self-reported effluent violations, thirteen NOVs with dissimilar violations, six orders containing a denial of liability, and one order without a denial of liability and the reduction for 295 notices of intent to conduct an audit, and 166 disclosures of violations is below zero the adjustment percentage (subtotal 2) defaults to zero.

Reduction for High Performer classification.

Total Compliance History Adjustment Percentage (Subtotals 2, 3, & 7) -10%

>> Final Compliance History Adjustment

Final Adjustment Percentage *capped at 100% -10%

Screening Date 1-Oct-2019

Docket No. 2019-1485-IWD-E

PCW

Respondent The Dow Chemical Company

Policy Revision 4 (April 2014)

Case ID No. 58448

PCW Revision March 26, 2014

Reg. Ent. Reference No. RN100225945

Media Water Quality

Enf. Coordinator Harley Hobson

Violation Number 1

Rule Cite(s) 30 Tex. Admin. Code § 305.125(1), Tex. Water Code § 26.121(a)(1), and Texas Pollutant Discharge Elimination System ("TPDES") Permit No. WQ0000007000, Outfall No. 002, Effluent Limitations and Monitoring Requirements ("ELMR") No. 1

Violation Description Failed to comply with permitted effluent limitations, as shown in the attached effluent violation table.

Base Penalty \$25,000

>> Environmental, Property and Human Health Matrix

OR

Release	Major	Harm Moderate	Minor
Actual		X	
Potential			

Percent 30.0%

>> Programmatic Matrix

Falsification	Major	Moderate	Minor

Percent 0.0%

Matrix Notes

A simplified model was used to evaluate total copper to determine whether the discharged amounts of pollutants exceeded levels protective of human health or the environment. Human health or the environment has been exposed to significant amounts of pollutants which do not exceed levels that are protective of human health or environmental receptors as a result of the violation.

Adjustment \$17,500

\$7,500

Violation Events

Number of Violation Events 1

31 Number of violation days

daily	
weekly	
monthly	X
quarterly	
semiannual	
annual	
single event	

Violation Base Penalty \$7,500

One monthly event is recommended for the month of December 2018.

Good Faith Efforts to Comply

0.0%

Reduction \$0

Before NOE/NOV NOE/NOV to EDPRP/Settlement Offer

Extraordinary	
Ordinary	
N/A	X

Notes

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

Violation Subtotal \$7,500

Economic Benefit (EB) for this violation

Statutory Limit Test

Estimated EB Amount \$5,397

Violation Final Penalty Total \$6,750

This violation Final Assessed Penalty (adjusted for limits) \$6,750

Economic Benefit Worksheet

Respondent The Dow Chemical Company
Case ID No. 58448
Reg. Ent. Reference No. RN100225945
Media Water Quality
Violation No. 1

Percent Interest 5.0
Years of Depreciation 15

Item Description	Item Cost	Date Required	Final Date	Yrs	Interest Saved	Costs Saved	EB Amount
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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)	\$50,000	30-Sep-2018	26-Nov-2020	2.16	\$5,397	n/a	\$5,397

Notes for DELAYED costs

Estimated cost to determine the cause of noncompliance and to make necessary repairs/adjustments to the Facility. The Date Required is the end date of the first month of noncompliance and the Final Date is the estimated date of compliance.

Avoided Costs

ANNUALIZE 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				0.00	\$0	\$0	\$0
ONE-TIME avoided costs				0.00	\$0	\$0	\$0
Other (as needed)				0.00	\$0	\$0	\$0

Notes for AVOIDED costs

Approx. Cost of Compliance

\$50,000

TOTAL

\$5,397

Screening Date 1-Oct-2019

Docket No. 2019-1485-IWD-E

PCW

Respondent The Dow Chemical Company

Policy Revision 4 (April 2014)

Case ID No. 58448

PCW Revision March 26, 2014

Reg. Ent. Reference No. RN100225945

Media Water Quality

Enf. Coordinator Harley Hobson

Violation Number 2

Rule Cite(s)

30 Tex. Admin. Code § 305.125(1), Tex. Water Code § 26.121(a)(1), and TPDES Permit No. WQ0000007000, Outfall No. 002, ELMR No. 1; Outfall No. 004, ELMR No. 2; and Outfall No. 701, ELMR No. 1

Violation Description

Failed to comply with permitted effluent limitations, as shown in the attached effluent violation table.

Base Penalty \$25,000

>> Environmental, Property and Human Health Matrix

OR

Release	Harm		
	Major	Moderate	Minor
Actual			X
Potential			

Percent 15.0%

>> Programmatic Matrix

Falsification	Major	Moderate	Minor

Percent 0.0%

Matrix Notes

A simplified model was used to evaluate total copper to determine whether the discharged amounts of pollutants exceeded levels protective of human health or the environment. The pH and total suspended solids were also considered. Human health or the environment has been exposed to insignificant amounts of pollutants that do not exceed levels that are protective of human health or environmental receptors as a result of the violation.

Adjustment \$21,250

\$3,750

Violation Events

Number of Violation Events 5

122 Number of violation days

daily	
weekly	
monthly	
quarterly	X
semiannual	
annual	
single event	

Violation Base Penalty \$18,750

Five quarterly events are recommended: two quarters for Outfall No. 002 for the months of January 2019, and May 2019; one quarter for Outfall No. 004 for the month of June 2019; and two quarters for Outfall No. 701 for the months of September 2018 and June 2019.

Good Faith Efforts to Comply

0.0%

Reduction \$0

Before NOE/NOV NOE/NOV to EDPRP/Settlement Offer

Extraordinary	
Ordinary	
N/A	X

Notes

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

Violation Subtotal \$18,750

Economic Benefit (EB) for this violation

Statutory Limit Test

Estimated EB Amount \$0

Violation Final Penalty Total \$16,875

This violation Final Assessed Penalty (adjusted for limits) \$16,875

Economic Benefit Worksheet

Respondent The Dow Chemical Company

Case ID No. 58448

Reg. Ent. Reference No. RN100225945

Media Water Quality

Violation No. 2

Percent Interest	Years of Depreciation
5.0	15

Item Description	Item Cost	Date Required	Final Date	Yrs	Interest Saved	Costs Saved	EB Amount
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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)				0.00	\$0	n/a	\$0

Notes for DELAYED costs

See Economic Benefit for Violation No. 1.

Avoided Costs

ANNUALIZE 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				0.00	\$0	\$0	\$0
ONE-TIME avoided costs				0.00	\$0	\$0	\$0
Other (as needed)				0.00	\$0	\$0	\$0

Notes for AVOIDED costs

Approx. Cost of Compliance

\$0

TOTAL

\$0

Screening Date 1-Oct-2019

Docket No. 2019-1485-IWD-E

PCW

Respondent The Dow Chemical Company

Policy Revision 4 (April 2014)

Case ID No. 58448

PCW Revision March 26, 2014

Reg. Ent. Reference No. RN100225945

Media Water Quality

Enf. Coordinator Harley Hobson

Violation Number 3

Rule Cite(s) 30 Tex. Admin. Code § 305.125(1), Tex. Water Code § 26.121(a)(1), and TPDES Permit No. WQ0000007000, Outfall No. 301, ELMR No. 1; Outfall No. 501, ELMR No. 1

Violation Description

Failed to comply with permitted effluent limitations, as shown in the attached effluent violation table.

Base Penalty \$25,000

>> Environmental, Property and Human Health Matrix

OR

Release	Harm		
	Major	Moderate	Minor
Actual			
Potential			x

Percent 7.0%

>> Programmatic Matrix

Falsification	Major	Moderate	Minor

Percent 0.0%

Matrix Notes

Human health or the environment will or could be exposed to insignificant amounts of pollutants that would not exceed levels that are protective of human health or environmental receptors as a result of the violation.

Adjustment \$23,250

\$1,750

Violation Events

Number of Violation Events 3

91 Number of violation days

daily	
weekly	
monthly	
quarterly	
semiannual	
annual	
single event	x

Violation Base Penalty \$5,250

Three single events are recommended (one for each month of noncompliance); September 2018 at Outfall No. 301; and March 2019 and June 2019 at Outfall No. 501.

Good Faith Efforts to Comply

0.0%

Reduction \$0

Before NOE/NOV NOE/NOV to EDPRP/Settlement Offer

Extraordinary	
Ordinary	
N/A	x

Notes

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

Violation Subtotal \$5,250

Economic Benefit (EB) for this violation

Statutory Limit Test

Estimated EB Amount \$0

Violation Final Penalty Total \$4,725

This violation Final Assessed Penalty (adjusted for limits) \$4,725

Economic Benefit Worksheet

Respondent The Dow Chemical Company
Case ID No. 58448
Reg. Ent. Reference No. RN100225945
Media Water Quality
Violation No. 3

Percent Interest 5.0
Years of Depreciation 15

Item Description Item Cost Date Required Final Date Yrs Interest Saved Costs Saved 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)				0.00	\$0	n/a	\$0

Notes for DELAYED costs

See Economic Benefit for Violation No. 1.

Avoided Costs

ANNUALIZE 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				0.00	\$0	\$0	\$0
ONE-TIME avoided costs				0.00	\$0	\$0	\$0
Other (as needed)				0.00	\$0	\$0	\$0

Notes for AVOIDED costs

Approx. Cost of Compliance

\$0

TOTAL

\$0

The Dow Chemical Company
Docket No. 2019-1485-IWD-E
TPDES Permit No. WQ0000007000
Case No. 58448

Effluent Violation Table

	Outfall 002		Outfall 004	Outfall 301	Outfall 501	Outfall 701
	Total Copper Daily Average Concentration	Total Copper Daily Maximum Concentration	pH Maximum	Total Purgeable Halocarbons Daily Maximum Loading	Total Purgeable Halocarbons Daily Maximum Concentration*	Total Suspended Solids Daily Maximum Loading
Monitoring Period	Limit = 5.86 µg/L	Limit = 12.4 µg/L	Limit = 9 SU	Limit = 2 lbs/day	Limit = 0.1 mg/L	Limit = 3,580 lbs/day
September 2018	c	c	c	12	c	6,776
December 2018	8.96	16.5	c	c	c	c
January 2019	c	14.0	c	c	n/a	c
March 2019	c	c	c	c	0.2	c
May 2019	c	14.9	c	c	n/a	c
June 2019	c	c	9.2	c	0.2	5,022

µg/L = micrograms per liter
n/a = not applicable
mg/L milligrams per liter

lbs/day = pounds per day
* = frequency of once per quarter

SU = standard units
c = compliant

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TCEQ Compliance History Report

Compliance History Report for CN600356976, RN100225945, Rating Year 2019 which includes Compliance History (CH) components from September 1, 2014, through August 31, 2019.

Customer, Respondent, or Owner/Operator:	CN600356976, The Dow Chemical Company	Classification:	HIGH	Rating:	0.06
Regulated Entity:	RN100225945, Dow Texas Operations Freeport	Classification:	HIGH	Rating:	0.00
Complexity Points:	116	Repeat Violator:	NO		
CH Group:	05 - Chemical Manufacturing				
Location:	2301 North Brazosport Boulevard, north of the City of Freeport in Brazoria County, Texas				
TCEQ Region:	REGION 12 - HOUSTON				

ID Number(s):

AIR OPERATING PERMITS ACCOUNT NUMBER BL0082R

AIR OPERATING PERMITS PERMIT 2211

AIR OPERATING PERMITS PERMIT 2213

AIR OPERATING PERMITS PERMIT 2216

AIR OPERATING PERMITS PERMIT 2218

AIR OPERATING PERMITS PERMIT 2220

AIR OPERATING PERMITS PERMIT 2311

AIR OPERATING PERMITS PERMIT 3905

AIR OPERATING PERMITS PERMIT 3777

INDUSTRIAL AND HAZARDOUS WASTE EPA ID

TXD000803270

INDUSTRIAL AND HAZARDOUS WASTE SOLID WASTE

REGISTRATION # (SWR) 30106

PUBLIC WATER SYSTEM/SUPPLY REGISTRATION

0200535

PUBLIC WATER SYSTEM/SUPPLY REGISTRATION

0200232

PUBLIC WATER SYSTEM/SUPPLY REGISTRATION

0200534

WASTEWATER PERMIT WQ0000007000

AIR NEW SOURCE PERMITS REGISTRATION 11832

AIR NEW SOURCE PERMITS PERMIT 20195

AIR NEW SOURCE PERMITS PERMIT 20525

AIR NEW SOURCE PERMITS PERMIT 20775

AIR NEW SOURCE PERMITS PERMIT 20909

AIR NEW SOURCE PERMITS PERMIT 22072

AIR NEW SOURCE PERMITS REGISTRATION 22809

AIR NEW SOURCE PERMITS REGISTRATION 22851

AIR NEW SOURCE PERMITS REGISTRATION 22945

AIR NEW SOURCE PERMITS REGISTRATION 23076

AIR NEW SOURCE PERMITS REGISTRATION 23388

AIR NEW SOURCE PERMITS REGISTRATION 24053

AIR NEW SOURCE PERMITS REGISTRATION 24030

AIR NEW SOURCE PERMITS REGISTRATION 25702

AIR NEW SOURCE PERMITS REGISTRATION 25536

AIR NEW SOURCE PERMITS REGISTRATION 28220

AIR NEW SOURCE PERMITS REGISTRATION 30622

AIR NEW SOURCE PERMITS REGISTRATION 31753

AIR NEW SOURCE PERMITS REGISTRATION 33609

AIR NEW SOURCE PERMITS REGISTRATION 34111

AIR NEW SOURCE PERMITS REGISTRATION 34368

AIR NEW SOURCE PERMITS REGISTRATION 34541

AIR OPERATING PERMITS PERMIT 2203

AIR OPERATING PERMITS PERMIT 2212

AIR OPERATING PERMITS PERMIT 2215

AIR OPERATING PERMITS PERMIT 2217

AIR OPERATING PERMITS PERMIT 2219

AIR OPERATING PERMITS PERMIT 2221

AIR OPERATING PERMITS PERMIT 2697

AIR OPERATING PERMITS PERMIT 4077

AIR OPERATING PERMITS PERMIT 3949

INDUSTRIAL AND HAZARDOUS WASTE EPA ID

TXD008092793

INDUSTRIAL AND HAZARDOUS WASTE PERMIT 50161

PUBLIC WATER SYSTEM/SUPPLY REGISTRATION

0200531

PUBLIC WATER SYSTEM/SUPPLY REGISTRATION

0200528

PUBLIC WATER SYSTEM/SUPPLY REGISTRATION

0200027

WASTEWATER EPA ID TX0006483

AIR NEW SOURCE PERMITS REGISTRATION 12173

AIR NEW SOURCE PERMITS PERMIT 20432

AIR NEW SOURCE PERMITS PERMIT 20687

AIR NEW SOURCE PERMITS PERMIT 20776

AIR NEW SOURCE PERMITS PERMIT 22070

AIR NEW SOURCE PERMITS REGISTRATION 22853

AIR NEW SOURCE PERMITS REGISTRATION 22810

AIR NEW SOURCE PERMITS REGISTRATION 22862

AIR NEW SOURCE PERMITS REGISTRATION 23075

AIR NEW SOURCE PERMITS REGISTRATION 23519

AIR NEW SOURCE PERMITS REGISTRATION 23389

AIR NEW SOURCE PERMITS REGISTRATION 24101

AIR NEW SOURCE PERMITS PERMIT 26692

AIR NEW SOURCE PERMITS REGISTRATION 26035

AIR NEW SOURCE PERMITS PERMIT 28363

AIR NEW SOURCE PERMITS REGISTRATION 30018

AIR NEW SOURCE PERMITS REGISTRATION 30503

AIR NEW SOURCE PERMITS REGISTRATION 31992

AIR NEW SOURCE PERMITS REGISTRATION 33593

AIR NEW SOURCE PERMITS REGISTRATION 34116

AIR NEW SOURCE PERMITS REGISTRATION 34545

AIR NEW SOURCE PERMITS REGISTRATION 35204

AIR NEW SOURCE PERMITS REGISTRATION 35203
AIR NEW SOURCE PERMITS REGISTRATION 35658
AIR NEW SOURCE PERMITS REGISTRATION 36554
AIR NEW SOURCE PERMITS REGISTRATION 36634
AIR NEW SOURCE PERMITS REGISTRATION 37122
AIR NEW SOURCE PERMITS REGISTRATION 37667
AIR NEW SOURCE PERMITS PERMIT 4031
AIR NEW SOURCE PERMITS REGISTRATION 4310A
AIR NEW SOURCE PERMITS PERMIT 6803
AIR NEW SOURCE PERMITS REGISTRATION 7341
AIR NEW SOURCE PERMITS REGISTRATION 7423
AIR NEW SOURCE PERMITS REGISTRATION 8009
AIR NEW SOURCE PERMITS REGISTRATION 10423
AIR NEW SOURCE PERMITS REGISTRATION 10790
AIR NEW SOURCE PERMITS REGISTRATION 10959
AIR NEW SOURCE PERMITS REGISTRATION 11566
AIR NEW SOURCE PERMITS REGISTRATION 11644
AIR NEW SOURCE PERMITS REGISTRATION 12130
AIR NEW SOURCE PERMITS REGISTRATION 12166
AIR NEW SOURCE PERMITS REGISTRATION 12445
AIR NEW SOURCE PERMITS REGISTRATION 12520
AIR NEW SOURCE PERMITS REGISTRATION 13873
AIR NEW SOURCE PERMITS REGISTRATION 16249
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AIR NEW SOURCE PERMITS REGISTRATION 153453
AIR NEW SOURCE PERMITS REGISTRATION 155316
AIR NEW SOURCE PERMITS REGISTRATION 154686
AIR NEW SOURCE PERMITS REGISTRATION 154613
IHW CORRECTIVE ACTION SOLID WASTE REGISTRATION
(SWR) 30106
STORMWATER PERMIT TXR1506AP
STORMWATER PERMIT TXR15363V
STORMWATER PERMIT WQ0004429000
POLLUTION PREVENTION PLANNING ID NUMBER
P00182
TAX RELIEF ID NUMBER 19748
TAX RELIEF ID NUMBER 16054
TAX RELIEF ID NUMBER 16058
TAX RELIEF ID NUMBER 20229
TAX RELIEF ID NUMBER 19750
TAX RELIEF ID NUMBER 20862
TAX RELIEF ID NUMBER 21033

AIR NEW SOURCE PERMITS REGISTRATION 149489
AIR NEW SOURCE PERMITS REGISTRATION 148119
AIR NEW SOURCE PERMITS REGISTRATION 142146
AIR NEW SOURCE PERMITS REGISTRATION 151647
AIR NEW SOURCE PERMITS REGISTRATION 149265
AIR NEW SOURCE PERMITS PERMIT AMOC15
AIR NEW SOURCE PERMITS REGISTRATION 151391
AIR NEW SOURCE PERMITS REGISTRATION 145011
AIR NEW SOURCE PERMITS REGISTRATION 150103
AIR NEW SOURCE PERMITS REGISTRATION 150370
AIR NEW SOURCE PERMITS REGISTRATION 150922
AIR NEW SOURCE PERMITS REGISTRATION 156272
AIR NEW SOURCE PERMITS PERMIT AMOC139
AIR NEW SOURCE PERMITS REGISTRATION 156685
AIR NEW SOURCE PERMITS REGISTRATION 152066
AIR NEW SOURCE PERMITS REGISTRATION 154959
AIR NEW SOURCE PERMITS REGISTRATION 158336
AIR NEW SOURCE PERMITS REGISTRATION 155127
AIR NEW SOURCE PERMITS REGISTRATION 158135
AIR NEW SOURCE PERMITS REGISTRATION 153079
AIR NEW SOURCE PERMITS REGISTRATION 157724
AIR NEW SOURCE PERMITS REGISTRATION 158749
AIR NEW SOURCE PERMITS REGISTRATION 159019
AIR NEW SOURCE PERMITS REGISTRATION 156026
AIR NEW SOURCE PERMITS REGISTRATION 158547
AIR NEW SOURCE PERMITS REGISTRATION 158187
AIR NEW SOURCE PERMITS REGISTRATION 153805
AIR NEW SOURCE PERMITS REGISTRATION 156122
AIR NEW SOURCE PERMITS REGISTRATION 158566
AIR NEW SOURCE PERMITS REGISTRATION 153856
AIR NEW SOURCE PERMITS REGISTRATION 155395
AIR NEW SOURCE PERMITS REGISTRATION 157469
AIR NEW SOURCE PERMITS REGISTRATION 158325
AIR NEW SOURCE PERMITS REGISTRATION 156764
AIR NEW SOURCE PERMITS REGISTRATION 152370
AIR NEW SOURCE PERMITS REGISTRATION 158543
AIR NEW SOURCE PERMITS EPA PERMIT N274
AIR NEW SOURCE PERMITS REGISTRATION 153384
AIR NEW SOURCE PERMITS REGISTRATION 152956
AIR NEW SOURCE PERMITS REGISTRATION 154299
AIR NEW SOURCE PERMITS REGISTRATION 152733
AIR NEW SOURCE PERMITS REGISTRATION 157619
AIR NEW SOURCE PERMITS REGISTRATION 153945
AIR NEW SOURCE PERMITS REGISTRATION 152663
AIR NEW SOURCE PERMITS REGISTRATION 156390
AIR NEW SOURCE PERMITS AFS NUM 4803900041
STORMWATER PERMIT TXR15XS41

STORMWATER PERMIT TXR15362V
STORMWATER PERMIT TXR15999Q
AIR EMISSIONS INVENTORY ACCOUNT NUMBER BL0082R
TAX RELIEF ID NUMBER 16039

TAX RELIEF ID NUMBER 16052
TAX RELIEF ID NUMBER 16057
TAX RELIEF ID NUMBER 16048
TAX RELIEF ID NUMBER 18734
TAX RELIEF ID NUMBER 21967
TAX RELIEF ID NUMBER 21028
TAX RELIEF ID NUMBER 21025

TAX RELIEF ID NUMBER 21022
TAX RELIEF ID NUMBER 21029
TAX RELIEF ID NUMBER 20228
TAX RELIEF ID NUMBER 19751
TAX RELIEF ID NUMBER 19752
TAX RELIEF ID NUMBER 16059
TAX RELIEF ID NUMBER 20735
TAX RELIEF ID NUMBER 20866
TAX RELIEF ID NUMBER 21035
TAX RELIEF ID NUMBER 18733
TAX RELIEF ID NUMBER 20224
TAX RELIEF ID NUMBER 16045
TAX RELIEF ID NUMBER 20733
TAX RELIEF ID NUMBER 20723
TAX RELIEF ID NUMBER 20736
TAX RELIEF ID NUMBER 20860
TAX RELIEF ID NUMBER 20241
TAX RELIEF ID NUMBER 21966

TAX RELIEF ID NUMBER 20865
TAX RELIEF ID NUMBER 21971
TAX RELIEF ID NUMBER 20737
TAX RELIEF ID NUMBER 19746
TAX RELIEF ID NUMBER 16051
TAX RELIEF ID NUMBER 16037
TAX RELIEF ID NUMBER 20760
TAX RELIEF ID NUMBER 21026
TAX RELIEF ID NUMBER 16038
TAX RELIEF ID NUMBER 19753
TAX RELIEF ID NUMBER 20217
TAX RELIEF ID NUMBER 20216
TAX RELIEF ID NUMBER 20245
TAX RELIEF ID NUMBER 21020
TAX RELIEF ID NUMBER 20734
TAX RELIEF ID NUMBER 20867
TAX RELIEF ID NUMBER 20732
TAX RELIEF ID NUMBER 21968

Compliance History Period: September 01, 2014 to August 31, 2019 **Rating Year:** 2019 **Rating Date:** 09/01/2019

Date Compliance History Report Prepared: November 13, 2019

Agency Decision Requiring Compliance History: Enforcement

Component Period Selected: November 13, 2014 to November 13, 2019

TCEQ Staff Member to Contact for Additional Information Regarding This Compliance History.

Name: Harley Hobson

Phone: (512) 239-1337

Site and Owner/Operator History:

- 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

Components (Multimedia) for the Site Are Listed in Sections A - J

A. Final Orders, court judgments, and consent decrees:

- 1 Effective Date: 05/23/2015 ADMINORDER 2014-1053-AIR-E (Findings Order-Agreed Order Without Denial)
Classification: Major
Citation: 30 TAC Chapter 101, SubChapter A 101.20(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)
Rqmt Prov: Special Condition 1 PERMIT
Special Terms and Conditions No. 21 OP
Description: Failed to prevent unauthorized emissions during an emissions event which occurred when fuel gas was vacuummed from a drum into the Cold Box system during a deriming maintenance activity. (Category A8.c.(2)(A)(ii))
- 2 Effective Date: 10/01/2015 ADMINORDER 2014-1881-AIR-E (1660 Order-Agreed Order With Denial)
Classification: Moderate
Citation: 30 TAC Chapter 101, SubChapter A 101.20(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)
Rqmt Prov: Special Condition 1 PERMIT
Special Terms and Conditions No. 21 OP
Description: Failed to prevent unauthorized emissions.
Classification: Moderate
Citation: 30 TAC Chapter 101, SubChapter A 101.20(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)
Rqmt Prov: Special Condition 1 PERMIT
Special Terms and Conditions No. 21 OP
Description: Failed to prevent unauthorized emissions.

Classification: Moderate
Citation: 30 TAC Chapter 101, SubChapter A 101.20(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)
Rqmt Prov: NSR 20432, SC 1 PERMIT
Special Terms and Conditions No. 21 OP
Description: Failed to prevent unauthorized emissions.

3 Effective Date: 07/13/2016 ADMINORDER 2015-1242-AIR-E (1660 Order-Agreed Order With Denial)

Classification: Moderate
Citation: 30 TAC Chapter 101, SubChapter A 101.20(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)
Rqmt Prov: Special Conditions No. 1 PERMIT
Special Terms and Conditions No. 21 OP
Description: Failed to prevent unauthorized emissions.
Classification: Moderate
Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)
5C THSC Chapter 382 382.085(b)
Rqmt Prov: NSR SC 1 PERMIT
Special Terms and Conditions No. 16 OP
Description: Failed to prevent unauthorized emissions.
Classification: Moderate
Citation: 30 TAC Chapter 101, SubChapter A 101.20(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)
Rqmt Prov: NSR SC 1 PERMIT
Special Terms and Conditions No. 21 OP
Description: Failed to prevent unauthorized emissions.
Classification: Moderate
Citation: 30 TAC Chapter 101, SubChapter A 101.20(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)
Rqmt Prov: NSR SC 1 PERMIT
Special Terms and Conditions No. 21 OP
Description: Failed to prevent unauthorized emissions.

4 Effective Date: 11/08/2016 ADMINORDER 2015-1671-AIR-E (1660 Order-Agreed Order With Denial)

Classification: Moderate
Citation: 30 TAC Chapter 101, SubChapter A 101.20(3)
30 TAC Chapter 116, SubChapter B 116.115(b)(2)(F)
30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)
5C THSC Chapter 382 382.085(b)
Rqmt Prov: NSR SC 1 PERMIT
Description: Failed to prevent unauthorized emissions.
Classification: Moderate
Citation: 30 TAC Chapter 122, SubChapter B 122.143(4)
5C THSC Chapter 382 382.085(b)
Rqmt Prov: STC 3.A.(iv)(1) OP
Description: Failure to conduct quarterly visible emission observations. (Category B1 violation)

5 Effective Date: 02/27/2018 ADMINORDER 2017-0378-AIR-E (1660 Order-Agreed Order With Denial)

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

30 TAC Chapter 116, SubChapter B 116.115(b)(2)(F)
30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)
5C THSC Chapter 382 382.085(b)
Rqmt Prov: SC 1 PERMIT
ST&C 20 OP

Description: Failed to comply with the MAER for Throx FB-1A and FB-1B, EPN A16S1, and failed to control the HCl concentration limit with a control efficiency of at least 99% or to a HCl concentration of no more than 20 parts per million by volume ("ppmv"), in violation of 30 TEX. ADMIN. CODE §§?101.20(2), 116.115(b)(2)(F) and (c), and 122.143(4), TEX. HEALTH & SAFETY CODE §?382.085(b), 40 CODE OF FEDERAL REGULATIONS §?63.9000(a), Federal Operating Permit ("FOP") No. O1388, Special Terms and Conditions ("

Classification: Moderate

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

Rqmt Prov: ST&C 1 OP

Description: Failed to submit a stack test report within 60 days after the stack test date, in violation of 30 TEX. ADMIN. CODE §§?116.115(c) and 122.143(4), TEX. HEALTH & SAFETY CODE §?382.085(b), FOP No. O1388, STC No. 20, and NSR Permit No. 5340, SC No. 17.E. Specifically, the stack test report for the October 5, 2011 stack test was due by December 4, 2011, but was not submitted until December 6, 2011.

Classification: Minor

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

Rqmt Prov: SC 17(E) PERMIT
ST&C 20 OP

Description: Failure to submit performance test report by the report submittal deadline.

6 Effective Date: 05/30/2018 ADMINORDER 2016-1940-AIR-E (1660 Order-Agreed Order With Denial)

Classification: Moderate

Citation: 30 TAC Chapter 101, SubChapter A 101.20(3)
30 TAC Chapter 116, SubChapter B 116.115(b)(2)(F)
30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)
5C THSC Chapter 382 382.085(b)

Rqmt Prov: NSR Special Condition 1 PERMIT

Description: The Respondent released 13,567.28 pounds ("lbs") of carbon monoxide ("CO"), 4,315.91 lbs of nitrogen oxides ("NOx"), 157.69 lbs of sulfur dioxide ("SO2"), and 11,333.59 lbs of volatile organic compounds ("VOC") including 2,732.91 lbs of highly reactive VOC ("HRVOC") from the Multi-Point Ground Flare, Emission Point Number ("EPN") OC4F9551; 482.62 lbs of CO, 94.71 lbs of NOx, 26.06 lbs of HRVOC, and 20.96 lbs of SO2 from the Low Pressure Flare FS957, EPN OC4F957; 456.18 lbs of CO, 53.20 lbs o

Classification: Moderate

Citation: 30 TAC Chapter 101, SubChapter A 101.20(3)
30 TAC Chapter 116, SubChapter B 116.115(b)(2)(F)
30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)
5C THSC Chapter 382 382.085(b)

Description: During a record review conducted from June 23, 2016 through July 7, 2016, an investigator documented that the Respondent released 5,761.20 lbs of CO, 4,125.60 lbs of VOC, and 1,110.6 lbs NOx from the FS-1 Large Elevated Flare, EPN B60F3, during an avoidable emissions event (Incident No. 234405) that began on June 1, 2016 and lasted 20 hours. The emissions event occurred at the Light Hydrocarbons 7 Unit when improper electrical insulation on a motor-operated valve led to flaring. TCEQ staff deter

Classification: Moderate

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

Description: The final report for Incident No. 233204 did not contain all the contaminants emitted, total quantity of contaminants, and the authorized emissions limits for each emission point.

See addendum for information regarding federal actions.

B. Criminal convictions:

N/A

C. Chronic excessive emissions events:

N/A

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

Item 1	November 17, 2014	(1209283)	Item 60	May 02, 2016	(1308360)
Item 2	November 20, 2014	(1218490)	Item 61	May 03, 2016	(1308298)
Item 3	November 24, 2014	(1210203)	Item 62	June 01, 2016	(1334888)
Item 4	December 03, 2014	(1170318)	Item 63	June 02, 2016	(1330295)
Item 5	December 05, 2014	(1193169)	Item 64	June 21, 2016	(1352171)
Item 6	December 17, 2014	(1224269)	Item 65	June 30, 2016	(1330512)
Item 7	December 19, 2014	(1211893)	Item 66	July 15, 2016	(1336940)
Item 8	December 22, 2014	(1211963)	Item 67	July 22, 2016	(1336948)
Item 9	January 06, 2015	(1211960)	Item 68	August 04, 2016	(1349564)
Item 10	January 20, 2015	(1212015)	Item 69	August 11, 2016	(1350221)
Item 11	January 26, 2015	(1210942)	Item 70	August 15, 2016	(1355365)
Item 12	February 17, 2015	(1242306)	Item 71	August 23, 2016	(1365569)
Item 13	February 23, 2015	(1224083)	Item 72	September 15, 2016	(1351489)
Item 14	February 24, 2015	(1227568)	Item 73	October 13, 2016	(1362271)
Item 15	February 25, 2015	(1228990)	Item 74	October 17, 2016	(1378447)
Item 16	March 20, 2015	(1248635)	Item 75	November 14, 2016	(1370017)
Item 17	March 30, 2015	(1222054)	Item 76	November 16, 2016	(1384406)
Item 18	April 14, 2015	(1241592)	Item 77	November 30, 2016	(1358608)
Item 19	April 16, 2015	(1229930)	Item 78	December 05, 2016	(1370211)
Item 20	April 20, 2015	(1255535)	Item 79	December 09, 2016	(1378127)
Item 21	April 28, 2015	(1217459)	Item 80	December 15, 2016	(1390544)
Item 22	April 30, 2015	(1241317)	Item 81	December 21, 2016	(1376985)
Item 23	May 07, 2015	(1229955)	Item 82	January 17, 2017	(1377298)
Item 24	May 20, 2015	(1241386)	Item 83	February 17, 2017	(1404044)
Item 25	May 21, 2015	(1262245)	Item 85	March 02, 2017	(1362323)
Item 26	June 12, 2015	(1258822)	Item 86	March 20, 2017	(1395680)
Item 27	June 17, 2015	(1241410)	Item 87	April 20, 2017	(1417647)
Item 28	June 23, 2015	(1269414)	Item 88	May 17, 2017	(1425236)
Item 29	July 03, 2015	(1242049)	Item 89	June 19, 2017	(1431239)
Item 30	July 09, 2015	(1255238)	Item 90	July 10, 2017	(1416988)
Item 31	July 10, 2015	(1254554)	Item 91	July 11, 2017	(1395683)
Item 32	July 16, 2015	(1265464)	Item 92	July 28, 2017	(1420674)
Item 33	July 23, 2015	(1254550)	Item 93	August 22, 2017	(1443537)
Item 34	July 31, 2015	(1255282)	Item 94	September 15, 2017	(1424872)
Item 35	August 19, 2015	(1283137)	Item 95	September 18, 2017	(1435035)
Item 36	September 22, 2015	(1290276)	Item 96	September 22, 2017	(1428476)
Item 37	October 13, 2015	(1273236)	Item 97	November 14, 2017	(1461463)
Item 38	October 14, 2015	(1282117)	Item 98	December 18, 2017	(1467843)
Item 39	October 20, 2015	(1296480)	Item 99	January 18, 2018	(1474548)
Item 40	November 16, 2015	(1275991)	Item 100	February 02, 2018	(1459599)
Item 41	November 18, 2015	(1275989)	Item 101	February 20, 2018	(1486774)
Item 42	November 23, 2015	(1287405)	Item 102	March 16, 2018	(1467528)
Item 43	December 07, 2015	(1273884)	Item 103	March 22, 2018	(1490451)
Item 44	December 11, 2015	(1276044)	Item 104	April 09, 2018	(1480319)
Item 45	December 15, 2015	(1308861)	Item 105	April 19, 2018	(1493688)
Item 46	December 17, 2015	(1280426)	Item 106	May 01, 2018	(1473000)
Item 47	December 29, 2015	(1286652)	Item 107	May 17, 2018	(1500606)
Item 48	January 11, 2016	(1280450)	Item 108	May 24, 2018	(1483257)
Item 49	January 20, 2016	(1315645)	Item 109	May 31, 2018	(1471435)
Item 50	February 02, 2016	(1308007)	Item 110	June 14, 2018	(1437581)
Item 51	February 22, 2016	(1260390)	Item 111	June 22, 2018	(1507723)
Item 52	February 23, 2016	(1325037)	Item 112	June 25, 2018	(1496731)
Item 53	March 14, 2016	(1252581)	Item 113	June 29, 2018	(1498791)
Item 54	March 22, 2016	(1312455)	Item 114	July 02, 2018	(1382264)
Item 55	March 28, 2016	(1266455)	Item 115	July 09, 2018	(1455650)
Item 56	March 30, 2016	(1312372)	Item 116	July 20, 2018	(1514041)
Item 57	April 04, 2016	(1315429)	Item 117	July 24, 2018	(1500178)
Item 58	April 20, 2016	(1338929)	Item 118	July 25, 2018	(1498607)
Item 59	April 29, 2016	(1328976)	Item 119	August 07, 2018	(1496738)

Item 120	August 22, 2018	(1520103)	Item 132	May 09, 2019	(1551944)
Item 121	September 07, 2018	(1447181)	Item 133	May 14, 2019	(1552881)
Item 122	September 21, 2018	(1527267)	Item 134	May 24, 2019	(1583292)
Item 123	October 15, 2018	(1519667)	Item 135	June 27, 2019	(1551637)
Item 124	October 18, 2018	(1518263)	Item 136	July 17, 2019	(1577087)
Item 125	November 05, 2018	(1513184)	Item 137	July 22, 2019	(1579513)
Item 126	November 19, 2018	(1519598)	Item 138	July 31, 2019	(1556123)
Item 127	November 28, 2018	(1517817)	Item 139	August 16, 2019	(1552380)
Item 128	December 18, 2018	(1545244)	Item 140	August 22, 2019	(1599500)
Item 129	January 30, 2019	(1532549)	Item 141	September 24, 2019	(1606405)
Item 130	February 21, 2019	(1533089)	Item 142	October 07, 2019	(1598147)
Item 131	March 20, 2019	(1559706)	Item 143	October 17, 2019	(1598880)

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

A notice of violation represents a written allegation of a violation of a specific regulatory requirement from the commission to a regulated entity. A notice of violation is not a final enforcement action, nor proof that a violation has actually occurred.

- 1

Date:	11/30/2018 (1517814)		
Self Report?	NO	Classification:	Moderate
Citation:	30 TAC Chapter 122, SubChapter B 122.143(4) 5C THSC Chapter 382 382.085(b) Special Term & Condition 3(A)(iv)(1) OP		
Description:	Failure to conduct visible emissions monitoring (Category B1).		
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 61.345(a)(1)(i) 5C THSC Chapter 382 382.085(b) Special Terms & Conditions 1A, 13 OP		
Description:	Failure to monitor waste containers(Category C4).		
Self Report?	NO	Classification:	Minor
Citation:	30 TAC Chapter 116, SubChapter B 116.115(c) 30 TAC Chapter 122, SubChapter B 122.143(4) 40 CFR Chapter 63, SubChapter C, PT 63, SubPT EEE 63.1209(b)(2) 5C THSC Chapter 382 382.085(b) Special Condition 7 PERMIT Special Terms & Conditions 1A, 21 OP		
Description:	Failure to perform annual calibration on the steam generating and distillation operations (Unit IDs: B8MBTO180 and B34VMT0210) (Category C1).		
Self Report?	NO	Classification:	Minor
Citation:	30 TAC Chapter 116, SubChapter B 116.115(c) 30 TAC Chapter 122, SubChapter B 122.143(4) 40 CFR Chapter 63, SubChapter C, PT 63, SubPT DD 63.695(c)(3)(i) 5C THSC Chapter 382 382.085(b) Special Term & Condition 1A OP		
Description:	Failure to conduct a first attempt to repair a leaking closed vent on a storage tank (Unit ID: B33INST410) within 5 days of discovery. (Category C1)		
Self Report?	NO	Classification:	Minor
Citation:	30 TAC Chapter 116, SubChapter B 116.115(c) 30 TAC Chapter 122, SubChapter B 122.143(4) 40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.169(a) 5C THSC Chapter 382 382.085(b) Special Term & Condition 1A OP		
Description:	Failure to re-monitor two components (Unit ID: B33INFU2) within five days of repair. (Category C1)		
- 2

Date:	12/31/2018 (1559707)		
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		
- 3

Date:	01/11/2019 (1479318)		
Self Report?	NO	Classification:	Moderate
Citation:	30 TAC Chapter 116, SubChapter B 116.115(c) 5C THSC Chapter 382 382.085(b) NSR 20432 Special Condition 1 PERMIT		
Description:	Failure to meet the demonstration criteria for an affirmative defense for unauthorized emissions during an emissions event. Category B14. Category B14.		

4 Date: 01/31/2019 (1559705)
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

5 Date: 02/13/2019 (1517736)
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 Special Term & Condition 18 OP
NSR Special Condition 11 PERMIT
Description: Failure to maintain the scrubber liquid to gas (L/G) ratio [EPN: A32DCSV599].
[Category C4]
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 Special Term & Condition 18 OP
NSR Special Condition 26 PERMIT
Description: Failure to maintain solvent flow to the scrubber [EPN: A32SV36] [Category C4]
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 Special Term & Condition 18 OP
NSR Special Condition 9 PERMIT
Description: Failure to conduct weekly pressure drop check on the glove box filter [EPN:
A32DCBH1]. [Category C1]
Self Report? NO Classification: Moderate
Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)
FOP Special Term & Condition 18 OP
NSR Special Condition 11 PERMIT
Description: Failure to maintain the scrubber bottom recycle flow rate [EPN: A32DCSV599].
[Category C4]
Self Report? NO Classification: Major
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 Special Term & Condition 18 OP
NSR Special Condition 25 PERMIT
Description: Failure to maintain scrubber efficiency [EPN: A32SV10]. [Category C4]
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)
5C THSC Chapter 382 382.085(b)
FOP Special Term & Condition 1A OP
FOP Special Term & Condition 1F OP
Description: Failure to monitor pumps in VOC service. [Category B1]

6 Date: 03/31/2019 (1571841)
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

7 Date: 05/31/2019 (1583293)
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

8 Date: 06/07/2019 (1532171)
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 12 PERMIT
STC 19 OP

Description: Failure to prevent exceedance of maximum firing rate (EPN OC4H320). (Category B18g1)

Self Report? NO Classification: Moderate

Citation: 30 TAC Chapter 116, SubChapter B 116.115(b)(2)(F)
30 TAC Chapter 116, SubChapter B 116.115(c)
5C THSC Chapter 382 382.085(b)
SC 1 PERMIT
STC 19 OP

Description: Failure to prevent exceedance of Maximum Allowable Emission Rate Table (MAERT) limits (EPN OC4H320). (Category B13)

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 23B PERMIT
STC 19 OP

Description: Failure to prevent exceedance of Total Dissolved Solids (TDS) (EPN OC4CT900). (Category C4)

Self Report? NO Classification: Moderate

Citation: 30 TAC Chapter 116, SubChapter B 116.115(b)(2)(F)
30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)
5C THSC Chapter 382 382.085(b)
SC 1 PERMIT
STC 19 OP

Description: Failure to prevent exceedance of Maximum Allowable Emission Rate Table (MAERT) limit (EPN OC4F9551). (Category C4)

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 24A PERMIT
STC 19 OP

Description: Failure to prevent exceedance of Sulfur Dioxide (SO2) concentration limit (EPN OC4SV485). (Category C7)

Self Report? NO Classification: Moderate

Citation: 30 TAC Chapter 116, SubChapter B 116.115(b)(2)(F)
30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)
5C THSC Chapter 382 382.085(b)
SC 1 PERMIT
STC 19 OP

Description: Failure to prevent exceedance of Maximum Allowable Emission Rate Table (MAERT) limit (EPN OC4SV485). (Category C7)

Self Report? NO Classification: Moderate

Citation: 20A PERMIT
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)(4)(iii)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT A 63.11(b)(7)(iii)
5C THSC Chapter 382 382.085(b)
STC 1A OP
STC 19 OP

Description: Failure to prevent exceedance of maximum flare exit velocity (EPN OC4F9551). (Category C4)

Self Report? NO Classification: Moderate

Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)
40 CFR Chapter 60, SubChapter C, PT 60, SubPT A 60.18(c)(4)(iii)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT A 63.11(b)(7)(iii)
5C THSC Chapter 382 382.085(b)
SC 20A PERMIT
STC 19 OP
STC 1A OP

Description: Failure to prevent exceedance of maximum flare exit velocity (EPN OC4F957). (Category C4)

Self Report? NO Classification: Moderate

Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)
40 CFR Chapter 60, SubChapter C, PT 60, SubPT A 60.18(c)(1)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT A 63.11(b)(4)

5C THSC Chapter 382 382.085(b)
 SC 20C PERMIT
 STC 1A OP
 STC 21 OP

Description: Failure to operate a flare without visible emissions (EPN OC4F9551). (Category C4)

Self Report? NO Classification: Moderate

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

Description: Failure to prevent exceedance of 24-hour rolling average Carbon Monoxide (CO) limit (EPN OC4H340). (Category B18g1)

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 13 PERMIT
 STC 19 OP

Description: Failure to prevent exceedance of hourly Carbon Monoxide (CO) concentration limit (EPN OC4H330). (Category B18g1)

Self Report? NO Classification: Moderate

Citation: 30 TAC Chapter 116, SubChapter B 116.115(b)(2)(F)
 30 TAC Chapter 122, SubChapter B 122.143(4)
 5C THSC Chapter 382 382.085(b)
 SC 1 PERMIT
 STC 19 OP

Description: Failure to prevent exceedance of Maximum Allowable Emission Rate Table (MAERT) limit (EPN OC4F956). (Category B13)

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 20A PERMIT
 STC 19 OP
 STC 28 OP

Description: Failure to meet minimum pressure requirement on pressure assisted flare stages (EPN OC4F9552). (Category C4)

9 Date: 06/30/2019 (1593154)

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

10 Date: 07/12/2019 (1540554)

Self Report? NO Classification: Minor

Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
 30 TAC Chapter 122, SubChapter B 122.143(4)
 40 CFR Chapter 63, SubChapter C, PT 63, SubPT FFFF 63.2525(b)(6)
 40 CFR Chapter 63, SubChapter C, PT 63, SubPT SS 63.987(c)
 40 CFR Chapter 63, SubChapter C, PT 63, SubPT SS 63.998(a)(1)(ii)
 5C THSC Chapter 382 382.085(b)
 General Condition 7 PERMIT
 Special Condition 4D PERMIT
 Special Terms & Conditions 1A & 14 OP

Description: Failure to maintain Flare (EPN: B78APF1) pilot light monitoring records. (Category C3)

Self Report? NO Classification: Minor

Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
 30 TAC Chapter 122, SubChapter B 122.143(4)
 40 CFR Chapter 60, SubChapter C, PT 60, SubPT A 60.18(c)(2)
 40 CFR Chapter 63, SubChapter C, PT 63, SubPT A 63.11(b)(5)
 5C THSC Chapter 382 382.085(b)
 General Condition 9 PERMIT
 Special Conditions 3A, 4A, & 7B PERMIT
 Special Term & Condition 14 PERMIT

Description: Failure to maintain operation of the Flare (EPN: B27P3F1) pilot light. (Category C4)

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 6 PERMIT
Special Term & Condition 14 OP
Description: Failure to update rolling 12-month Maintenance, Startup, and Shutdown Emissions records. (Category C3)
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 18E PERMIT
Special Term & Condition 14 OP
Description: Failure to prevent open-ended lines. (Category C10)

11 Date: 07/18/2019 (1578229)
Self Report? NO Classification: Moderate
Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 117, SubChapter B 117.310(c)(2)
30 TAC Chapter 122, SubChapter B 122.143(4)
5C THSC Chapter 382 382.085(b)
FOP SPECIAL TERMS AND CONDITION 15 OP
NSR SPECIAL CONDITION (SC) 7C PERMIT
Description: Failure to prevent exceedance of three-hour rolling average of Ammonia concentration from Steam Boiler (EPN: B56SB1). (Category B13)
Self Report? NO Classification: Minor
Citation: 30 TAC Chapter 122, SubChapter B 122.143(4)
30 TAC Chapter 122, SubChapter B 122.146(2)
40 CFR Chapter 61, SubChapter C, PT 61, SubPT FF 61.357(d)(6)
5C THSC Chapter 382 382.085(b)
SPECIAL TERM AND CONDITION 9M OP
Description: Failure to include certification on 2016 quarterly reports (Category C3)
Self Report? NO Classification: Moderate
Citation: 30 TAC Chapter 122, SubChapter B 122.143(4)
30 TAC Chapter 122, SubChapter B 122.145(2)(A)
5C THSC Chapter 382 382.085(b)
SPECIAL TERM AND CONDITION SC 15 OP
SPECIAL TERM AND CONDITION SC 9M OP
Description: Failure to report all instances of deviations (Category B3)

12 Date: 08/02/2019 (1581060)
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 22 OP
SPECIAL CONDITION 29(E) PERMIT
Description: Failure to comply with calibration and documentation of functionality test requirements for phosgene detectors.
C1, Minor 3A
Self Report? NO Classification: Moderate
Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)
30 TAC Chapter 122, SubChapter B 122.144(1)
5C THSC Chapter 382 382.085(b)
SPECIAL CONDITION 19 PERMIT
SPECIAL CONDITION 22 OP
Description: Failure to conduct pressure testing of methylene chloride tank trucks prior to loading operations.
C1, Moderate 2A

13 Date: 08/08/2019 (1517616)
Self Report? NO Classification: Minor
Citation: 30 TAC Chapter 117, SubChapter B 117.310(c)(1)(A)
30 TAC Chapter 122, SubChapter B 122.143(4)
5C THSC Chapter 382 382.085(b)
FOP, ST&C 1A OP
Description: Failure to maintain the carbon monoxide concentration (CO) within 400 parts per million (ppm) on a 24-hour rolling average. Category C4
Self Report? NO Classification: Moderate
Citation: 30 TAC Chapter 115, SubChapter D 115.354(2)(C)
30 TAC Chapter 115, SubChapter H 115.781(b)

30 TAC Chapter 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 63.1023(a)(1)(i)
 40 CFR Chapter 63, SubChapter C, PT 63, SubPT UU 63.1025(b)
 5C THSC Chapter 382 382.085(b)
 FOP, ST&C 1G OP
 FOP, ST&C 21 OP
 NSR, SC 11F PERMIT
 Description: Failure to monitor all HRVOC components at the required frequency. (Category C1 violation)
 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, ST&C 1A OP
 FOP, ST&C 21 OP
 NSR, SC 16E PERMIT
 Description: Failure to cap, plug, or otherwise seal an open-ended line. (Category C10 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 A 60.18(c)(3)(ii)
 5C THSC Chapter 382 382.085(b)
 FOP, ST&C 1A OP
 NSR, SC 20 PERMIT
 NSR, SC 23 PERMIT
 NSR, SC 3 PERMIT
 Description: Failure to maintain the flares' minimum net heating value at or above 300 British thermal units (Btu) per standard cubic foot (scf). (Category C4 violation)
 Self Report? NO Classification: Moderate
 Citation: 30 TAC Chapter 116, SubChapter B 116.115(b)(2)(F)
 30 TAC Chapter 116, SubChapter B 116.115(c)
 30 TAC Chapter 122, SubChapter B 122.143(4)
 5C THSC Chapter 382 382.085(b)
 FOP, ST&C 1A OP
 FOP, ST&C 21 OP
 NSR, SC1 PERMIT
 Description: Failure to prevent NOx exceedances of the Maximum Allowable Emission Rate (MAER) table for the Pyrolysis Furnace H-3, EPN: OC6S3. (Category B13 violation)
 Self Report? NO Classification: Moderate
 Citation: 30 TAC Chapter 116, SubChapter B 116.115(b)(2)(F)
 30 TAC Chapter 116, SubChapter B 116.115(c)
 30 TAC Chapter 122, SubChapter B 122.143(4)
 5C THSC Chapter 382 382.085(b)
 FOP, ST&C 1A OP
 FOP, ST&C 21 OP
 NSR, SC 1 PERMIT
 Description: Failure to prevent NOx exceedances of the Maximum Allowable Emission Rate (MAER) table for the Pyrolysis Furnace H-1, EPN: OC6S1. (Category B13 violation)
 Self Report? NO Classification: Moderate
 Citation: 30 TAC Chapter 116, SubChapter B 116.115(b)(2)(F)
 30 TAC Chapter 116, SubChapter B 116.115(c)
 30 TAC Chapter 122, SubChapter B 122.143(4)
 5C THSC Chapter 382 382.085(b)
 FOP, ST&C 21 OP
 FOP, ST&C1 OP
 NSR, SC1 PERMIT
 Description: Failure to prevent NOx exceedances of the Maximum Allowable Emission Rate (MAER) table for the Pyrolysis Furnace F4, EPN: OC6S4. (Category B13 violation)
 Self Report? NO Classification: Moderate
 Citation: 30 TAC Chapter 116, SubChapter B 116.115(b)(2)(F)
 30 TAC Chapter 116, SubChapter B 116.115(c)
 30 TAC Chapter 122, SubChapter B 122.143(4)
 5C THSC Chapter 382 382.085(b)
 FOP, ST&C 1A OP
 FOP, ST&C 21 OP
 NSR, SC1 PERMIT
 Description: Failure to prevent NOx exceedances of the Maximum Allowable Emission Rate (MAER) table for the Pyrolysis Furnace F5, EPN: OC6S5. (Category B13 violation)
 Self Report? NO Classification: Moderate

Citation: 30 TAC Chapter 116, SubChapter B 116.115(b)(2)(F)
 30 TAC Chapter 116, SubChapter B 116.115(c)
 30 TAC Chapter 122, SubChapter B 122.143(4)
 5C THSC Chapter 382 382.085(b)
 FOP, ST&C 1A OP
 FOP, ST&C 21 OP
 NSR, SC 1 PERMIT

Description: Failure to prevent CO exceedances of the Maximum Allowable Emission Rate (MAER) table for Pyrolysis Furnace No. 8, EPN: OC6S8. (Category B13 violation)

Self Report? NO Classification: Moderate

Citation: 30 TAC Chapter 116, SubChapter B 116.115(b)(2)(F)
 30 TAC Chapter 116, SubChapter B 116.115(c)
 30 TAC Chapter 122, SubChapter B 122.143(4)
 5C THSC Chapter 382 382.085(b)
 FOP, ST&C 1A OP
 FOP, ST&C 21 OP
 NSR, SC1 PERMIT

Description: Failure to prevent CO exceedances of the Maximum Allowable Emission Rate (MAER) table for Pyrolysis Furnace No. 2, EPN: OC6S2. (Category B13 violation)

Self Report? NO Classification: Moderate

Citation: 30 TAC Chapter 116, SubChapter B 116.115(b)(2)(F)
 30 TAC Chapter 116, SubChapter B 116.115(c)
 30 TAC Chapter 122, SubChapter B 122.143(4)
 5C THSC Chapter 382 382.085(b)
 FOP, ST&C 1A OP
 FOP, ST&C 21 OP
 NSR, SC 1 PERMIT

Description: Failure to prevent VOC emissions in excess of the Maximum Allowable Emission Rate (MAER) table at the portable flare, EPN: BL7FT01. (Category B13 violation)

Self Report? NO Classification: Moderate

Citation: 30 TAC Chapter 116, SubChapter B 116.115(b)(2)(F)
 30 TAC Chapter 116, SubChapter B 116.115(c)
 30 TAC Chapter 122, SubChapter B 122.143(4)
 5C THSC Chapter 382 382.085(b)
 FOP, ST&C 1A OP
 FOP, ST&C 21 OP
 NSR 20432, SC 1 PERMIT

Description: Failure to prevent VOC emissions in excess of the Maximum Allowable Emission Rate (MAER) table from Process Area Fugitives, EPN: OC6FU01. (Category B13 violation)

Self Report? NO Classification: Moderate

Citation: 30 TAC Chapter 116, SubChapter B 116.115(b)(2)(F)
 30 TAC Chapter 116, SubChapter B 116.115(c)
 30 TAC Chapter 122, SubChapter B 122.143(4)
 5C THSC Chapter 382 382.085(b)
 FOP, ST&C 1A OP
 FOP, ST&C 21 OP
 NSR, SC 1 PERMIT

Description: Failure to prevent VOC emissions in excess of the Maximum Allowable Emission Rate (MAER) table from the South Tank Farm #2 Fugitives, EPN: OC6FU12. (Category B13 violation)

Self Report? NO Classification: Moderate

Citation: 30 TAC Chapter 116, SubChapter B 116.115(b)(2)(F)
 30 TAC Chapter 116, SubChapter B 116.115(c)
 30 TAC Chapter 122, SubChapter B 122.143(4)
 5C THSC Chapter 382 382.085(b)
 FOP, ST&C 1A OP
 FOP, ST&C 21 OP
 NSR, SC 1 PERMIT

Description: Failure to prevent exceedances of the Maximum Allowable Emission Rate (MAER) table at the FS-1 Large Elevated Flare, EPN: B60F3. (Category B13 violation)

Self Report? NO Classification: Moderate

Citation: 30 TAC Chapter 116, SubChapter B 116.115(b)(2)(F)
 30 TAC Chapter 116, SubChapter B 116.115(c)
 30 TAC Chapter 122, SubChapter B 122.143(4)
 5C THSC Chapter 382 382.085(b)
 FOP, ST&C 1A OP
 FOP, ST&C 21 OP
 NSR, SC 1 PERMIT

Description: Failure to prevent exceedances of the Maximum Allowable Emission Rate (MAER) table from the FS-1 Elevated Flare, EPN: OC6F1. (Category B13 violation)

Self Report? NO Classification: Moderate

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

- 30 TAC Chapter 116, SubChapter B 116.115(c)
 30 TAC Chapter 122, SubChapter B 122.143(4)
 5C THSC Chapter 382 382.085(b)
 FOP, ST&C 1A OP
 FOP, ST&C 21 OP
 NSR, SC 1 PERMIT
- Description: Failure to prevent VOC exceedances of the Maximum Allowable Emission Rate (MAER) table for Uncontrolled MSS, EPN: B56FU1. (Category B13 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)
 FOP, GT&C OP
- Description: Failure to report all instances of deviations (Category B3 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)
 FOP, GT&Cs OP
- Description: Failure to report all instances of deviations (Category B3 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)
 FOP, GT&C OP
- Description: Failure to report all instances of deviations (Category B3 violation).
- 14 Date: 08/14/2019 (1557512)
- 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)
- Description: Failure to vent emissions from the Process Tanks to the Throx.
- 15 Date: 08/16/2019 (1551765)
- 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 11B PERMIT
 Special Term and Condition 15 OP
- Description: Failure to prevent cracks in the Particulate Matter (PM) emissions capture system. (Category C4).
- 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 12 PERMIT
 Special Term and Condition 15 OP
- Description: Failure to maintain storage throughput limit. (Category B12).
- 16 Date: 08/27/2019 (1570704)
- Self Report? NO Classification: Moderate
- Citation: 30 TAC Chapter 115, SubChapter H 115.729(b)
 30 TAC Chapter 122, SubChapter B 122.143(4)
 5C THSC Chapter 382 382.058(b)
 Special Terms and Conditions 1(A) OP
- Description: Failure to complete Visible Emissions testing with 60 days of a replacement flare being placed in service.
- 17 Date: 10/18/2019 (1592288)
- Self Report? NO Classification: Minor
- Citation: 30 TAC Chapter 122, SubChapter B 122.143(4)
 40 CFR Chapter 63, SubChapter C, PT 63, SubPT ZZZZ 63.6602
 40 CFR Chapter 63, SubChapter C, PT 63, SubPT ZZZZ 63.6640(a)
 40 CFR Chapter 63, SubChapter C, PT 63, SubPT ZZZZ 63.6640(b)
 40 CFR Chapter 63, SubChapter C, PT 63, SubPT ZZZZ 63.6655(e)(1)
 40 CFR Chapter 63, SubChapter C, PT 63, SubPT ZZZZ 63.6655(e)(2)
 40 CFR Chapter 63, SubChapter C, PT 63, SubPT ZZZZ 63.6655(e)(3)
 5C THSC Chapter 382 382.085(b)
 FOP Special Terms and Conditions 1I OP

Description: Failure to perform 2018 inspection/maintenance on Emergency Engines (EPNs: B71UBGE00D; B36UBGE10C; B56UBGE10E; B8UBGE830). (Category B1)
 Self Report? NO Classification: Minor
 Citation: 30 TAC Chapter 122, SubChapter B 122.143(4)
 40 CFR Chapter 63, SubChapter C, PT 63, SubPT ZZZZ 63.6602
 40 CFR Chapter 63, SubChapter C, PT 63, SubPT ZZZZ 63.6640(a)
 40 CFR Chapter 63, SubChapter C, PT 63, SubPT ZZZZ 63.6640(b)
 40 CFR Chapter 63, SubChapter C, PT 63, SubPT ZZZZ 63.6655(e)
 40 CFR Chapter 63, SubChapter C, PT 63, SubPT ZZZZ 63.6655(e)(1)
 40 CFR Chapter 63, SubChapter C, PT 63, SubPT ZZZZ 63.6655(e)(2)
 40 CFR Chapter 63, SubChapter C, PT 63, SubPT ZZZZ 63.6655(e)(3)
 5C THSC Chapter 382 382.085(b)
 FOP Special Terms and Conditions 1I OP
 Description: Failure to perform 2018 inspection/maintenance on Emergency Engines (EPNs: A70UAGE00B and A70UAGE00C). (Category B1)

18 Date: 11/08/2019 (1592289)
 Self Report? NO Classification: Minor
 Citation: 30 TAC Chapter 115, SubChapter H 115.725(d)(4)
 5C THSC Chapter 382 382.085(b)
 FOP Special Terms and Condition 1A OP
 Description: Failure to collect Highly Reactive Volatile Organic Compound (HRVOC) flare sample for EPN: BSRSRFMNF. (Category B1)

F. Environmental audits:

Notice of Intent Date: 10/19/2012 (1043662)
 Disclosure Date: 12/04/2015
 Viol. Classification: Moderate
 Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
 Rqmt Prov: PERMIT SC 1
 Description: Failure to comply with the hourly allowable VOC routine emissions rate for the plant flare.
 Viol. Classification: Moderate
 Citation: 30 TAC Chapter 116, SubChapter B 116.116(a)(1)
 Description: Failure to continuously operate the flare in a manner that maintains the minimum DRE that was represent in the permit application.
 Viol. Classification: Moderate
 Citation: 30 TAC Chapter 116, SubChapter B 116.115(b)(2)(G)
 40 CFR Chapter 260, SubChapter I, PT 260, SubPT B 260.11(d)
 Description: Failure to continuously operate the flare in a manner that maintained the minimum DRE.
 Viol. Classification: Moderate
 Citation: 30 TAC Chapter 116, SubChapter B 116.116(a)(1)
 Rqmt Prov: PERMIT SC 3
 Description: Failure to continuously operate the flare in a manner consistent with maintaining the heating value above 300 Btus/scf.
 Viol. Classification: Moderate
 Citation: 30 TAC Chapter 116, SubChapter B 116.116(a)(1)
 Description: Failure to comply with the hourly allowable emission limits for NOx, CO, VOC, Ethylene and Propylene.
 Notice of Intent Date: 03/03/2014 (1157660)
 Disclosure Date: 02/11/2015
 Viol. Classification: Major
 Citation: 30 TAC Chapter 116, SubChapter B 116.110(a)(2)(A)
 Description: Unauthorized fugitive components found on CEMP vent lines originating at the site logistics load rack were discovered.
 Viol. Classification: Major
 Citation: 30 TAC Chapter 115, SubChapter D 115.354
 30 TAC Chapter 116, SubChapter B 116.115(c)
 4F TWC Chapter 63, SubChapter A 63.168(b)
 40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.174(a)
 Description: Fugitive components found on CEMP vent lines originating at the site logistics load rack were not to be included in the fugitive monitoring program.
 Notice of Intent Date: 05/01/2014 (1171445)
 Disclosure Date: 04/17/2015
 Viol. Classification: Moderate
 Citation: 40 CFR Chapter 264, SubChapter I, PT 264, SubPT BB 264.1063
 40 CFR Chapter 63, SubChapter C, PT 63, SubPT MMM 63.1363(b)(3)

40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.180(b)(3)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.180(b)(4)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT EEEE 63.2346
40 CFR Chapter 63, SubChapter C, PT 63, SubPT FFFF 63.2480(b)

Rqmt Prov: PERMIT Special Condition 12.F
PERMIT Special Condition 13.F
PERMIT Special Condition 19.F
PERMIT Special condition 9.F
PERMIT Special Conditions 16.F and 27
PERMIT Special Conditions 20.F and 21
PERMIT Special conditions 26.F and 27

Description: Failure to comply with permit requirements. Fugitive components containing Carbon Tetrachloride and/or Formaldehyde at 51% or greater did not meet the requirement of Method 21 to perform daily calibrations with an appropriate calibration gas which would allow the instrument detector to respond to the components being monitored. This occurred during the period beginning January 6, 2009 through December 31, 2014. See Attachment A for details on components, associated permits, and applicable regul

Disclosure Date: 02/19/2015

Viol. Classification: Moderate

Citation: 40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.160
40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.161
40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.162
40 CFR Part 63, Subpart H 63.163
40 CFR Part 63, Subpart H 63.165
40 CFR Part 63, Subpart H 63.166
40 CFR Part 63, Subpart H 63.167
40 CFR Part 63, Subpart H 63.168
40 CFR Part 63, Subpart H 63.169
40 CFR Part 63, Subpart H 63.170
40 CFR Part 63, Subpart H 63.171
40 CFR Part 63, Subpart H 63.173
40 CFR Part 63, Subpart H 63.175
40 CFR Part 63, Subpart H 63.176
40 CFR Chapter 63, SubChapter C, PT 63, SubPT FFFF 63.2480

Description: Failure to comply with permit requirements. The composition of the process streams, the applicability of leak detection and repair programs and the management of fugitive components were evaluated during the audit as mentioned in the corrective action section of Violation 1. Based on this evaluation, it was determined that a number of components to which the 40 CFR Part 63 Subpart FFFF equipment leak requirements are applicable are not being managed as required. In addition, it was determine

Viol. Classification: Moderate

Citation: 40 CFR Part 63, Subpart H 63.166

Description: Failure to comply with permit requirements. Specifically, an open-purge sampling system is used to collect samples from a light liquid process stream that is subject to the 40 CFR 63 Subpart FFFF Equipment Leak Requirements.

Disclosure Date: 03/25/2015

Viol. Classification: Moderate

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

Rqmt Prov: PERMIT Special Conditions 10 and 11

Description: Failure to comply with permit requirements. The composition of the process streams, the applicability of leak detection and repair programs and the management of fugitive components were evaluated during the audit as mentioned in the corrective action section of Violation 1. Based on this evaluation, it was determined that a number of components to which the 28 MID and 28 CNTQ equipment leak requirements included in Special Conditions 10 and 11 of NSR Permit No. 20776 are applicable are not be

Viol. Classification: Major

Citation: 30 TAC Chapter 116, SubChapter B 116.110

Description: Operating without required authorization. Tank D-58 is a hinged-roof vessel with a capacity of approximately 40 gallons. It is used to collect and pump unused samples and other liquids back into the process, and vents to the atmosphere. There is currently no authorization in NSR Permit No. 20776 or by PBR for the emissions from the vessel.

Viol. Classification: Moderate

Citation: 40 CFR Chapter 265, SubChapter I, PT 265, SubPT BB 265.1057
40 CFR Chapter 265, SubChapter I, PT 265, SubPT BB 265.1058
40 CFR Chapter 265, SubChapter I, PT 265, SubPT BB 265.1064

Description: The composition of the process streams, the applicability of leak detection and repair programs and the

management of fugitive components were evaluated during the audit as mentioned in the corrective action section of Violation 1. Based on this evaluation, it was determined that several components to which the 40 CFR 265 Subpart BB equipment leak requirements are applicable are not being managed as required.

Disclosure Date: 04/27/2015

Viol. Classification: Moderate

Citation: 40 CFR Chapter 63, SubChapter C, PT 63, SubPT EEE 63.1206(c)(6)

Description: A training program has not been established for the Continuous Emissions Monitoring Systems (CEMS) technicians. Annual or refresher training records are not available for control room operators for the years 2009 to the present.

Viol. Classification: Moderate

Citation: 30 TAC Chapter 115, SubChapter F 115.544

Description: Tank V-4074 which has a capacity greater than 250,000 gallons and stores allyl chloride with a VOC true vapor pressure greater than 0.5 psia was degassed at the end of 2013 in preparation for cleaning. The required monitoring was not conducted during the degassing operations, and the required records of the degassing activity including the results of any leak inspections and repairs conducted are not available.

Viol. Classification: Moderate

Citation: 40 CFR Chapter 61, SubChapter C, PT 61, SubPT FF 61.345

40 CFR Chapter 61, SubChapter C, PT 61, SubPT FF 61.356

Description: Failure to maintain records. No initial visual or Method 21 inspection records are available for four containers which were disposed of between April and August of 2014.

Viol. Classification: Moderate

Citation: 30 TAC Chapter 122, SubChapter B 122.142(b)(2)(A)

Description: The minor revision submitted on 12/08/2010 for Title V Permit No. O2208 did not include the applicable requirements for all equipment associated with the APDC process, and the revised permit issued April 30, 2014 does not contain the equipment and requirements for all equipment associated with the APDC Process. Equipment and requirements missing include, but are not limited to: (1) The permit shield should indicate that Subpart Kb is superseded by the Group 1 storage vessel provisions in 40 CFR

Viol. Classification: Moderate

Citation: 40 CFR Chapter 60, SubChapter C, PT 60, SubPT QQQ 60.705(r)

Description: Failure to maintain records. The process design descriptions to be submitted with the initial report for 40 CFR 60 Subpart RRR and retained for the life of the process was unavailable for the six reactors at PDC Hydro (R-520, R-530, R-540, R-820, R-830 and R-840) that are subject to Subpart RRR and are complying with the exemption at 40 CFR 60.700(c)(5) for vent streams routed to a distillation unit subject to 40 CFR 60 Subpart NNN.

Viol. Classification: Minor

Citation: 40 CFR Chapter 63, SubChapter C, PT 63, SubPT G 63.114(a)(4)

40 CFR Chapter 63, SubChapter C, PT 63, SubPT G 63.118(f)

40 CFR Chapter 63, SubChapter C, PT 63, SubPT G 63.152(b)

Description: The Hazardous Organic NESHA (HON) process vent control device requirements are not being met as follows: (1) The control system consists of the T-607 acid absorber, the T-609 scrubber, and the FTB-603 thermal oxidizer (Throx), but the T-607 absorber is not identified in the Notification of Compliance Status (NOCS) as being part of the control system.; (2) The liquid/gas (L/G) ratio of the absorber is monitored, but it is not identified as the required operating parameter for the absorber and n

Viol. Classification: Minor

Citation: 30 TAC Chapter 101, SubChapter A 101.10

30 TAC Chapter 115, SubChapter D 115.354(10)

30 TAC Chapter 115, SubChapter D 115.354(11)

30 TAC Chapter 115, SubChapter D 115.354(3)

30 TAC Chapter 115, SubChapter D 115.356(2)

30 TAC Chapter 115, SubChapter D 115.356(5)

30 TAC Chapter 115, SubChapter H 115.781(a)

30 TAC Chapter 115, SubChapter H 115.781(b)

30 TAC Chapter 115, SubChapter H 115.781(g)

30 TAC Chapter 115, SubChapter H 115.786(e)

30 TAC Chapter 115, SubChapter H 115.786(g)

40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.160

40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.174(a)

40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.174(b)

40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.174(i)

40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.181

40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.182

40 CFR Chapter 63, SubChapter C, PT 63, SubPT FFFF 63.2480

Rqmt Prov: PERMIT Special Condition 16.E. & K.

Description: Fugitive components (784 connectors, 190 valves, 40 relief valves, and 5 compressors) were identified as not being monitored and/or reported or included in the emissions calculations beginning January 9, 1998.

Viol. Classification: Moderate

Citation: 30 TAC Chapter 115, SubChapter D 115.352(8)

30 TAC Chapter 116, SubChapter B 116.115(c)

Rqmt Prov: PERMIT Special Condition 16.E.

Description: Failure to comply with permit requirements. Specifically, 40 connectors that are 2 inches or larger in diameter were identified as being screwed connections.

Disclosure Date: 04/27/2015

Viol. Classification: Moderate

Citation: 40 CFR Chapter 60, SubChapter C, PT 60, SubPT NNN 60.660

40 CFR Chapter 60, SubChapter C, PT 60, SubPT NNN 60.661

40 CFR Part 60, Subpart NNN 60.662

40 CFR Chapter 60, SubChapter C, PT 60, SubPT NNN 60.663

40 CFR Chapter 60, SubChapter C, PT 60, SubPT NNN 60.664

40 CFR Chapter 60, SubChapter C, PT 60, SubPT NNN 60.665

40 CFR Part 60, Subpart NNN 60.666

40 CFR Part 60, Subpart NNN 60.667

40 CFR Chapter 60, SubChapter C, PT 60, SubPT NNN 60.668

Description: The requirements for the New Source Performance Standard for Distillation Operations (NSPS NNN) were not implemented correctly for Allyl 2. The Title V permit states that the distillation units T-830, T-840, T-845, and T-850 are shielded from NSPS NNN because the distillation units do not have a vent stream. All of these columns do have a vent stream routed through the D-894 knock out pot to the following control systems:

- FTO/T-1310 /T-1320

- Kiln/IWS-210/T-205

- F-210/T-213/T-214

There a

Viol. Classification: Moderate

Citation: 40 CFR Chapter 60, SubChapter C, PT 60, SubPT QQQ 60.700

40 CFR Chapter 60, SubChapter C, PT 60, SubPT QQQ 60.701

40 CFR Chapter 60, SubChapter C, PT 60, SubPT QQQ 60.702

40 CFR Chapter 60, SubChapter C, PT 60, SubPT QQQ 60.703

40 CFR Chapter 60, SubChapter C, PT 60, SubPT QQQ 60.704

40 CFR Chapter 60, SubChapter C, PT 60, SubPT QQQ 60.705

40 CFR Chapter 60, SubChapter C, PT 60, SubPT QQQ 60.706

40 CFR Part 60, Subpart RRR 60.707

40 CFR Chapter 60, SubChapter C, PT 60, SubPT QQQ 60.708

40 CFR Chapter 63, SubChapter C, PT 63, SubPT G 63.110(d)(10)

40 CFR Chapter 63, SubChapter C, PT 63, SubPT G 63.110(d)(9)

Description: The requirements for the New Source Performance Standard for Reactors (NSPS RRR) were not implemented correctly for certain venting scenarios at the following affected facilities:
(a) Allyl 2: R-805 and R-810 reactors are listed in Title V as being subject to NSPS RRR but superseded by HON Subpart G with the requirements at the D-209 knock out pot (B19G1D209). The actual knock-out pot is D-894.

The vent stream from these reactors can also be routed either directly or indirectly to the Emerg

Viol. Classification: Moderate

Citation: 30 TAC Chapter 101, SubChapter A 101.10

30 TAC Chapter 115, SubChapter D 115.354(10)

30 TAC Chapter 115, SubChapter D 115.354(11)

30 TAC Chapter 115, SubChapter D 115.354(3)

30 TAC Chapter 115, SubChapter D 115.356(2)

30 TAC Chapter 115, SubChapter D 115.356(5)

30 TAC Chapter 115, SubChapter H 115.781(a)

30 TAC Chapter 115, SubChapter H 115.781(b)

30 TAC Chapter 115, SubChapter H 115.781(g)

30 TAC Chapter 115, SubChapter H 115.786(e)

30 TAC Chapter 115, SubChapter H 115.786(g)

40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.160

40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.174(a)

40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.174(b)

40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.174(c)(1)(i)

40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.174(i)

40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.181

40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.182

40 CFR Chapter 63, SubChapter C, PT 63, SubPT FFFF 63.2480

Rqmt Prov: PERMIT Special Conditions 16.E & 16.K

Description: Fugitive components (490 connectors, 264 valves, 7 relief valves, and 11 pumps) were identified as not being monitored and/or reported or included in the emissions calculations beginning January 9, 1998.

Viol. Classification: Moderate

Citation: 30 TAC Chapter 115, SubChapter D 115.352(8)
30 TAC Chapter 116, SubChapter B 116.115(c)

Rqmt Prov: PERMIT Special Condition 16.E

Description: Failure to comply with permit requirements. Specifically, 95 connectors that are 2 inches or larger in diameter were identified as being screwed connections.

Viol. Classification: Moderate

Citation: 40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.181(c)

Description: Failure to comply with permit requirements. Specifically, 16 weekly visual pump inspections could not be found.

Viol. Classification: Moderate

Citation: 30 TAC Chapter 116, SubChapter B 116.116(a)
30 TAC Chapter 116, SubChapter B 116.116(a)(1)
30 TAC Chapter 116, SubChapter B 116.116(a)(2)

Description: Failure to comply with permit requirements. Specifically, 1055 connectors and 85 valves were classified incorrectly in Gas/Vapor or Light Liquid service.

Notice of Intent Date: 08/13/2014 (1193170)

Disclosure Date: 08/13/2015

Viol. Classification: Moderate

Citation: 30 TAC Chapter 115, SubChapter D 115.354(3)

Rqmt Prov: PERMIT Special Condition 14 E

Description: Failure to perform AVO inspections as required. Specifically, weekly audio, visual, olfactory (AVO) inspections were not being performed on the styrene or acrylonitrile connectors as required.

Notice of Intent Date: 08/21/2014 (1195715)

Disclosure Date: 01/27/2015

Viol. Classification: Minor

Citation: 40 CFR Chapter 266, SubChapter I, PT 266, SubPT H 266.102(e)(8)(iv)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT EEE 63.1206(c)(3)(vii)

Rqmt Prov: PERMIT Section V.I.7.d.

Description: Failure to conduct weekly tests of the heavy oil maximum feed automatic waste feed cutoff, between 10/6/2014 and 11/10/2014.

Viol. Classification: Minor

Citation: 40 CFR Chapter 63, SubChapter C, PT 63, SubPT EEE 63.1209(b)(3)

Description: Failure to maintain equipment. Light oil was burned on Boiler B-901 with a failed stack gas flowmeter. Process control code allowed introduction of light oil on boiler while stack gas flowmeter had failed. The required MTEC (Maximum Theoretical Emission Concentrations) could not be properly calculated with a failed stack gas flow meter. Oils were burned under these conditions on 11/3/14 from 15:35 - 15:42 and 16:47 - 16:56.

Disclosure Date: 05/12/2015

Viol. Classification: Moderate

Citation: 30 TAC Chapter 116, SubChapter B 116.110(a)(2)(A)

Description: Unauthorized activities for Pipeline Blasting and Painting jobs were conducted.

Disclosure Date: 04/07/2015

Viol. Classification: Moderate

Citation: 40 CFR Chapter 61, SubChapter C, PT 61, SubPT FF 61.355(a)(1)(iii)

Description: The reported Freeport Total Annual Benzene (TAB) did not include waste received from other sites or shipped offsite for treatment.

Disclosure Date: 04/23/2015

Viol. Classification: Moderate

Citation: 40 CFR Chapter 61, SubChapter C, PT 61, SubPT FF 61.345(a)(1)
40 CFR Chapter 61, SubChapter C, PT 61, SubPT FF 61.345(a)(1)(i)

Description: Containers received from other sites for treatment were not initially monitored to verify no detectable emissions.

Notice of Intent Date: 10/16/2014 (1204824)

Disclosure Date: 05/07/2015

Viol. Classification: Moderate

Citation: 30 TAC Chapter 115, SubChapter D 115.354
30 TAC Chapter 115, SubChapter H 115.781
40 CFR Part 61, Subpart V 61.242-7

Rqmt Prov: PERMIT SC 5 & 6

Description: Failure to conduct monitoring. Missed monitoring on 9 valves and 25 connectors in fugitive area BSRFUBRCK.

Viol. Classification: Moderate

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

Rqmt Prov: PERMIT SC 5 & 6

Description: Failure to conduct monitoring. Missed monitoring on 5 valves and 15 connectors in fugitive area BSRFUSTV.

Notice of Intent Date: 10/15/2014 (1204856)

Disclosure Date: 12/18/2015

Viol. Classification: Moderate

Citation: 40 CFR Chapter 265, SubChapter I, PT 265, SubPT C 265.50
40 CFR Chapter 265, SubChapter I, PT 265, SubPT D 265.56
30 TAC Chapter 335, SubChapter C 335.69(a)(4)(A)

Description: Failure to have a RCRA Storage Contingency Plan for units SWMU #727 and SWMU #700.

Viol. Classification: Minor

Citation: 40 CFR Chapter 265, SubChapter I, PT 265, SubPT I 265.174
30 TAC Chapter 335, SubChapter C 335.69(a)(1)(A)

Description: Failure to properly complete the weekly inspections of storage areas SWMU 727, 700, 563, 714, and 701.

Notice of Intent Date: 11/05/2014 (1210431)

Disclosure Date: 12/16/2014

Viol. Classification: Major

Citation: 30 TAC Chapter 290, SubChapter D 290.39(d)
30 TAC Chapter 290, SubChapter D 290.39(l)
30 TAC Chapter 290, SubChapter D 290.46(n)(3)

Description: Failed to seek TCEQ approval for several public water systems (PWS) wells (16 total). In addition, the facility does not have the well completion data, including: driller's well log, cementing certificate and sanitary easement or ordinance for these wells.

Notice of Intent Date: 11/05/2014 (1210439)

Disclosure Date: 04/21/2015

Viol. Classification: Moderate

Citation: 30 TAC Chapter 115, SubChapter E 115.412(1)(F)(iv)

Description: Failure to comply with permit requirements. Specifically, the Cold Solvent Cleaner located at B-6803 has porous material in the tray and is being used as a scrubber for the material in the vat.

Notice of Intent Date: 11/07/2014 (1210447)

Disclosure Date: 05/12/2015

Viol. Classification: Moderate

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

Rqmt Prov: PERMIT Special Condition No. 5

Description: Failure to comply with annual fuel gas usage for the FL-7001 flare.

Viol. Classification: Minor

Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
40 CFR Chapter 60, SubChapter C, PT 60, SubPT A 60.18

Rqmt Prov: PERMIT SC 6.D.

Description: Failure to ensure that flow meters on the A-22 Flare are properly working and ensure BTU requirements are met.

Notice of Intent Date: 11/13/2014 (1211533)

Disclosure Date: 12/23/2014

Viol. Classification: Minor

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

Rqmt Prov: PERMIT Special Conditions 13 and 14

Description: Failure to maintain records. A review of MSS activity records at Polyethylene 3 found multiple instances of incomplete records. Missing from some of them were estimates of emissions resulting from the activity and in some were measurements of the VOC concentration in the vapor before opening the equipment. A review of the records compared to known maintenance work also indicated that some activities had not been recorded.

Viol. Classification: Minor

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

Rqmt Prov: PERMIT Special Conditions 5B and 19D

Description: Failure to maintain records. Records of thermocouple calibration or replacement on the Polyethylene 3 plant flare were not kept. This plant has determined that it is more practical to replace the thermocouples than to calibrate them but a frequency of replacement was not set.

Viol. Classification: Minor
Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
Rqmt Prov: PERMIT Footnote on MAERT

Description: Failure to maintain records. Monthly records of the annual emission rates from all EPNs in Permit 6803, based on a rolling 12 month period, were not kept.

Viol. Classification: Moderate
Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
Rqmt Prov: PERMIT Special Condition 18

Description: Failure to comply with permit requirements. Demonstration of compliance with hourly and annual emission rates in Permit 6803 is incomplete. In some cases activities cannot exceed hourly emission rates due to physical limitations but documentation does not exist to demonstrate this. In other cases, records of the activity are needed to demonstrate compliance and those records do not exist.

Viol. Classification: Minor
Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
Rqmt Prov: PERMIT Special Condition 4A

Description: Failure to comply with permit requirements. The capture system for the Polyethylene 3 flare is not being monitored monthly using the audio, visual, olfactory method or annually using Method 21.

Viol. Classification: Minor
Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
Rqmt Prov: PERMIT Special Condition 15

Description: Failure to maintain records. Records from tank clearing activities at Polyethylene 3 were incomplete. The records did not indicate whether there were no standing liquids or if a low vapor pressure material was added to reduce the vapor pressure at the time the tank was opened for ventilation.

Viol. Classification: Minor
Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
Rqmt Prov: PERMIT Special Conditions 5B and 10D

Description: Failure to maintain records. Records of thermocouple calibration or replacement on the Polyethylene 4 plant flare were not kept. This plant has determined that it is more practical to replace the thermocouples that to calibrate them but a frequency of replacement was not set.

Viol. Classification: Moderate
Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
Rqmt Prov: PERMIT Special Condition 17

Description: Failure to maintain records. Records of calibrations of the pressure monitoring devices associated with the filters at Polyethylene 4 were not kept and presumably were not done.

Viol. Classification: Moderate
Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
Rqmt Prov: PERMIT Special Condition 15B

Description: Failure to comply with permit requirements. Monthly records of storage tank throughputs at Polyethylene 4 and calculations of the associated emissions, including the rolling 12 month total, were not done. The tanks in question have EPNs B37ST1, B37ST2, B37ST3, B37ST4 and B37ST5.

Viol. Classification: Moderate
Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
Rqmt Prov: PERMIT Special Condition 14

Description: Failure to comply with permit requirements. Monthly records of VOC loading at Polyethylene 4 and the calculations of emissions from EPN B41LR1, including the rolling 12 month total, were not done.

Viol. Classification: Moderate
Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
Rqmt Prov: PERMIT footnote on MAERT

Description: Failure to maintain records. Monthly records of the annual emission rates from all EPNs in Permit 834, based on a rolling 12 month period, were not kept.

Viol. Classification: Minor
Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
Rqmt Prov: PERMIT Special Condition 16

Description: Failure to comply with permit requirements. The capture system for the flare is not being monitored monthly using the audio, visual, olfactory method or annually using Method 21.

Notice of Intent Date: 11/20/2014 (1210459)

Disclosure Date: 02/11/2015

Viol. Classification: Minor

Citation: 30 TAC Chapter 115, SubChapter E 115.412(1)(A)
30 TAC Chapter 115, SubChapter E 115.412(1)(B)
30 TAC Chapter 115, SubChapter E 115.412(1)(C)
30 TAC Chapter 115, SubChapter E 115.412(1)(D)

30 TAC Chapter 115, SubChapter E 115.412(1)(E)

30 TAC Chapter 115, SubChapter E 115.412(1)(F)

Description: Failure to conduct inspections as required by permit. Specifically, the monthly checklists for the CEMP A-2432 and PMDI A-3610 degreasing units are missing the documented inspection for freeboards.

Notice of Intent Date: 11/20/2014 (1211544)

No DOV Associated

Notice of Intent Date: 11/25/2014 (1211536)

Disclosure Date: 12/23/2014

Viol. Classification: Moderate

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

Rqmt Prov: PERMIT Special condition 17

Description: Failure to comply with permit requirements regarding inspections. Specifically, review of the daily filtered vent inspection records found inconsistencies between the manner in which these inspections were performed and the description of requirements for both inspecting and recordkeeping.

Viol. Classification: Moderate

Citation: 30 TAC Chapter 111, SubChapter A 111.111(a)(1)(A)

30 TAC Chapter 122, SubChapter B 122.143(4)

Rqmt Prov: OP Special condition 3

Description: Failure to comply with permit requirements regarding inspections. Specifically, a review of the weekly and quarterly visual inspection records found inconsistencies between the manner in which these inspections were performed and the description of requirements for both inspecting and recordkeeping.

Notice of Intent Date: 12/01/2014 (1216299)

Disclosure Date: 04/17/2015

Viol. Classification: Minor

Citation: 30 TAC Chapter 116, SubChapter B 116.115

Rqmt Prov: PERMIT NSR Permit 4020, SC 8.D

Description: Failure to use correct piping connectors for piping 2 inch or larger in diameter. Two screwed connections with two-inch diameters were placed in R-134a service when new piping was installed for routine maintenance of the mechanical refrigeration unit.

Notice of Intent Date: 12/11/2014 (1216301)

No DOV Associated

Notice of Intent Date: 12/18/2014 (1217781)

No DOV Associated

Notice of Intent Date: 01/07/2015 (1217816)

No DOV Associated

Notice of Intent Date: 01/12/2015 (1222651)

Disclosure Date: 01/13/2015

Viol. Classification: Moderate

Citation: 30 TAC Chapter 115, SubChapter B 115.121(a)(1)

30 TAC Chapter 115, SubChapter B 115.122(a)(1)

Rqmt Prov: OP Periodic Monitoring, Applicable Regulat

Description: Failure to maintain records. Neither the required weekly inspections nor weekly data review are currently being documented.

Disclosure Date: 06/26/2015

Viol. Classification: Moderate

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

30 TAC Chapter 122, SubChapter B 122.143(4)

Rqmt Prov: OP Special condition 17

PERMIT Special Condition 23

PERMIT Special condition 4

Description: Failure to maintain records. Specifically, the rolling 12-month emissions for maintenance, start-up, and shutdown (MSS) activities are not being updated on a monthly basis.

Notice of Intent Date: 01/27/2015 (1227980)

No DOV Associated

Notice of Intent Date: 02/03/2015 (1227986)

No DOV Associated

Notice of Intent Date: 02/06/2015 (1229213)
No DOV Associated

Notice of Intent Date: 02/12/2015 (1229218)
No DOV Associated

Notice of Intent Date: 03/04/2015 (1239848)
Disclosure Date: 09/15/2015

Viol. Classification: Moderate

Citation: 40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.165(d)(2)

Description: Failure to comply with permit requirements, specifically in regards to replacing rupture disks within a certain timeframe.

Notice of Intent Date: 03/02/2015 (1239850)
Disclosure Date: 03/03/2016

Viol. Classification: Moderate

Citation: 40 CFR Chapter 61, SubChapter C, PT 61, SubPT FF 61.345(a)(1)(i)

Description: Failure to conduct fugitive monitoring on components for a container containing benzene waste.

Viol. Classification: Moderate

Citation: 4F TWC Chapter 60, SubChapter A 60.345(b)

Description: Failure to maintain records of AVO inspections for benzene waste regulated containers.

Viol. Classification: Moderate

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

30 TAC Chapter 115, SubChapter H 115.783(5)

40 CFR Chapter 61, SubChapter C, PT 61, SubPT FF 61.346(b)(4)

40 CFR Chapter 63, SubChapter C, PT 63, SubPT UU 63.1033(b)(1)

Rqmt Prov: PERMIT NSRP 20432 SC 16.E.

Description: Failure to prevent seven open-ended lines in fugitive area B72FU1.

Viol. Classification: Moderate

Citation: 30 TAC Chapter 117, SubChapter B 117.340(j)

Description: Failure to record the run time meter values in the operating logs for emergency diesel engine B72LGE01.

Viol. Classification: Moderate

Citation: 30 TAC Chapter 117, SubChapter B 117.310(f)

Description: Failure to ensure that engines are not operated between the hours of 6 am and noon. Specifically, engine B72L7GE01 was operated for maintenance testing between the hours of 6 am and noon.

Viol. Classification: Minor

Citation: 30 TAC Chapter 111, SubChapter A 111.111(a)(4)(A)(ii)

Rqmt Prov: OP Title V O-02213

Description: Failure to conduct daily flare inspections. Specifically, one daily flare inspection was missed.

Viol. Classification: Minor

Citation: 30 TAC Chapter 115, SubChapter D 115.354(2)(C)

30 TAC Chapter 115, SubChapter H 115.781(b)

40 CFR Chapter 63, SubChapter C, PT 63, SubPT UU 63.1025

40 CFR Chapter 63, SubChapter C, PT 63, SubPT UU 63.1027

Rqmt Prov: PERMIT NSRP 20432 SC 16F and SC 17

OP Title V Permit O2213

Description: Failure to conduct required Method 21 monitoring on 24 valves and 39 connectors in VOC service.

Viol. Classification: Minor

Citation: 30 TAC Chapter 115, SubChapter D 115.354(2)(C)

40 CFR Chapter 63, SubChapter C, PT 63, SubPT UU 63.1025

40 CFR Chapter 63, SubChapter C, PT 63, SubPT UU 63.1027

Rqmt Prov: PERMIT NSRP 20432 SC 16F and SC 17

OP Title V Permit O2213

Description: Failure to conduct required Method 21 monitoring on three valves and 33 connectors in VOC service.

Viol. Classification: Minor

Citation: 30 TAC Chapter 115, SubChapter D 115.354(2)(C)

30 TAC Chapter 115, SubChapter H 115.781(b)

40 CFR Chapter 63, SubChapter C, PT 63, SubPT UU 63.1025

40 CFR Chapter 63, SubChapter C, PT 63, SubPT UU 63.1027

Rqmt Prov: PERMIT NSRP 20432 SC 16F and 17

PERMIT Title V Permit O2213

Description: Failure to conduct required Method 21 monitoring on 27 valves and 72 connectors in HRVOC service.

Viol. Classification: Moderate

Citation: 40 CFR Chapter 63, SubChapter C, PT 63, SubPT SS 63.998(d)(1)(iii)(B)

40 CFR Chapter 63, SubChapter C, PT 63, SubPT SS 63.998(d)(1)(iii)(C)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT SS 63.998(d)(1)(iii)(D)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT SS 63.998(d)(1)(iii)(E)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT SS 63.999(c)(2)(i)

Description: Failure to report all equipment leaks on Closed Vent Systems.

Viol. Classification: Minor

Citation: 30 TAC Chapter 115, SubChapter H 115.782(b)(1)

Description: Failure to follow the required repair schedule for leaks for 41 valves, 132 connectors, and two pumps that are HRVOC components.

Viol. Classification: Minor

Citation: 30 TAC Chapter 115, SubChapter D 115.354(2)(C)

30 TAC Chapter 115, SubChapter H 115.781(b)

40 CFR Chapter 63, SubChapter C, PT 63, SubPT UU 63.1025

40 CFR Chapter 63, SubChapter C, PT 63, SubPT UU 63.1027

Description: Failure to conduct required Method 21 monitoring on eight valves and 14 connectors that were on the wrong monitoring frequency.

Notice of Intent Date: 03/05/2015 (1239859)

Disclosure Date: 03/08/2016

Viol. Classification: Moderate

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

Description: Failure to ensure that Notice of Registration units are current with the appropriate waste code as detailed in the March 8, 2016 Final Disclosure of Violations.

Viol. Classification: Moderate

Citation: 40 CFR Chapter 265, SubChapter I, PT 265, SubPT I 265.174

30 TAC Chapter 335, SubChapter A 335.6(c)

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

Description: Failure to ensure that the Notice of Registration unit is current with the appropriate waste code and ensure weekly inspections for a waste storage area are completed.

Notice of Intent Date: 03/06/2015 (1239863)

No DOV Associated

Notice of Intent Date: 03/10/2015 (1241185)

Disclosure Date: 03/08/2016

Viol. Classification: Moderate

Citation: 30 TAC Chapter 115, SubChapter H 115.725(c)

Rqmt Prov: OP Title V Permit O2211

Description: Failure to follow recordkeeping, monitoring, and reporting requirements for streams potentially containing HRVOCs at the Thermal Treatment Facility applicable to 30 TAC 115 Subchapter H.

Viol. Classification: Moderate

Citation: 30 TAC Chapter 115, SubChapter H 115.726(e)(3)(A)

30 TAC Chapter 115, SubChapter H 115.786(d)

Description: Failure to maintain records to demonstrate compliance with exemptions for HRVOC vent gas streams not routed to a flare and fugitive emissions.

Viol. Classification: Moderate

Citation: 30 TAC Chapter 115, SubChapter H 115.725(c)(1)

30 TAC Chapter 115, SubChapter H 115.725(c)(3)(D)

Description: Failure to comply with monitoring, recordkeeping and/or inspection requirements for affected pressure relief valves not controlled by a flare.

Viol. Classification: Moderate

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

30 TAC Chapter 115, SubChapter H 115.722(b)

30 TAC Chapter 115, SubChapter H 115.722(c)

30 TAC Chapter 115, SubChapter H 115.726(g)

30 TAC Chapter 115, SubChapter H 115.726(h)

Description: Failure to maintain records for HRVOC emission resulting from vents to the atmosphere during maintenance, startup, shutdown, and emissions events.

Viol. Classification: Moderate

Citation: 30 TAC Chapter 115, SubChapter H 115.781(a)

30 TAC Chapter 115, SubChapter H 115.781(b)(3)

30 TAC Chapter 115, SubChapter H 115.781(e)

Description: Failure to include fugitive components containing HRVOCs in an HRVOC monitoring program.

Notice of Intent Date: 03/11/2015 (1241188)
No DOV Associated

Notice of Intent Date: 03/11/2015 (1241193)
Disclosure Date: 05/12/2015

Viol. Classification: Moderate

Citation: 40 CFR Chapter 63, SubChapter C, PT 63, SubPT F 63.100(g)

Description: Failure to comply with permit requirements. Five storage tanks (V800A, V800B, V5010, V5020, V5030) and their ancillary equipment were not properly assigned to a chemical manufacturing process unit subject to 40 CFR 63 Subparts F, G, and H (HON). These storage tanks and ancillary equipment were being managed and controlled in accordance with applicable 40 CFR 63 Subpart EEEE (OLD MACT) requirements.

Disclosure Date: 09/23/2015

Viol. Classification: Moderate

Citation: 40 CFR Chapter 63, SubChapter C, PT 63, SubPT F 63.100(g)

Description: Failure to comply with permit requirements. Five storage tanks (V800A, V800B, V5010, V5020, V5030) and their ancillary equipment were not properly assigned to a chemical manufacturing process unit subject to 40 CFR 63 Subparts F, G, and H (HON). These storage tanks and ancillary equipment were being managed and controlled in accordance with applicable 40 CFR 63 Subpart EEEE (OLD MACT) requirements.

Viol. Classification: Moderate

Citation: 30 TAC Chapter 115, SubChapter C 115.213(d)(2)

Description: Failure to submit notification of an additional marine loading rack and revised 90% overall control plan within 30 days of installation.

Viol. Classification: Minor

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

Rqmt Prov: PERMIT Special Condition 1

Description: Failure to submit a permit amendment. The fugitive component representation in the NSR 93978 application is not correct. However all components are being monitored as required.

Viol. Classification: Moderate

Citation: 40 CFR Chapter 63, SubChapter C, PT 63, SubPT F 63.100(h)

Description: Failure to comply with permit requirements. One loading rack (A70ECLR1) was not properly assigned to a chemical manufacturing process unit subject to 40 CFR 63 Subparts F, G, and H (HON).

Viol. Classification: Moderate

Citation: 30 TAC Chapter 115, SubChapter D 115.354

40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.160(a)

Rqmt Prov: PERMIT Special Condition 8

Description: Failure to comply with permit requirements regarding labeling and monitoring of fugitive components. Specifically, 80 components were found to be missing identification and monitoring.

Viol. Classification: Major

Citation: 30 TAC Chapter 116, SubChapter B 116.110(a)

Description: Failure to obtain authorization. Specifically, emissions from an existing HCl tank (D-402) were not authorized.

Notice of Intent Date: 03/11/2015 (1241196)
Disclosure Date: 09/23/2015

Viol. Classification: Moderate

Citation: 30 TAC Chapter 115, SubChapter H 115.782(c)(2)(A)(i)(I)

Description: Extraordinary efforts to repair a leak from a valve in HRVOC service were not done prior to placing it on delay of repair. The valve was replaced during a planned shutdown.

Viol. Classification: Moderate

Citation: 40 CFR Chapter 63, SubChapter C, PT 63, SubPT F 63.100(h)

Description: Three loading racks (OC5U5LR2, OC5U5TL1, and OC5U5TL2) were not properly assigned to a chemical manufacturing process unit subject to 40 CFR 63 Subparts F, G, and H (HON).

Viol. Classification: Major

Citation: 30 TAC Chapter 116, SubChapter B 116.110(a)

Description: Failure to have authorization. Emissions from two loading racks (EPNs OC5TL1 and OC5TL2) were not authorized.

Viol. Classification: Moderate

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

Description: 321 fugitive components were found to be missing identification and monitoring.

Notice of Intent Date: 03/20/2015 (1241924)
No DOV Associated

Notice of Intent Date: 03/19/2015 (1241930)
Disclosure Date: 09/25/2015

Viol. Classification: Moderate

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

Rqmt Prov: PERMIT SC 21.C

Description: The calculated ammonia concentration in the GT-96 turbine exhaust stack does not match the ammonia concentrations from stack samples at all operating conditions.

Viol. Classification: Moderate

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

Rqmt Prov: PERMIT SC 1 and SC 5

Description: The catalyst performance for the Selective Catalytic Reduction (SCR) unit on GT-96 has degraded sufficiently to allow excess emissions of ammonia at the stack.

Notice of Intent Date: 04/15/2015 (1248400)

No DOV Associated

Notice of Intent Date: 04/23/2015 (1248407)

No DOV Associated

Notice of Intent Date: 04/23/2015 (1248411)

No DOV Associated

Notice of Intent Date: 04/28/2015 (1248448)

Disclosure Date: 05/12/2015

Viol. Classification: Moderate

Citation: 40 CFR Chapter 61, SubChapter C, PT 61, SubPT FF 61.342(c)(1)(i)

40 CFR Chapter 61, SubChapter C, PT 61, SubPT FF 61.342(c)(1)(ii)

Description: Failure to comply with disposal requirements. Specifically, applicable BWON waste did not comply with the standards prior to and during treatment; and the benzene was not removed or destroyed as required.

Viol. Classification: Moderate

Citation: 40 CFR Chapter 61, SubChapter C, PT 61, SubPT FF 61.345(a)(1)(i)

Description: Failure to comply with monitoring requirements. Specifically, containers sent for treatment were not initially monitored to verify no detectable emissions.

Notice of Intent Date: 05/01/2015 (1254424)

Disclosure Date: 05/03/2016

Viol. Classification: Moderate

Citation: 40 CFR Chapter 266, SubChapter I, PT 266, SubPT H 266.102(e)(8)(iv)

40 CFR Chapter 63, SubChapter C, PT 63, SubPT EEE 63.1206(c)(3)(vii)

Rqmt Prov: PERMIT Section V.I.7.d.

Description: Failure to complete AWFCO testing on Boilers B-907, B-902, and B-903 within the seven day frequency as required for the time period listed on the DOV.

Viol. Classification: Moderate

Citation: 40 CFR Chapter 266, SubChapter I, PT 266, SubPT H 266.102(e)(10)

40 CFR Chapter 63, SubChapter C, PT 63, SubPT EEE 63.1206(c)(3)(vii)

Rqmt Prov: PERMIT Section V I.7.e.

Description: Failure to maintain monitoring and inspection records for five years as required for Boilers B-901, B-902, and B-903. Specifically, the seven day AWFCO test records are missing or incomplete for the dates listed on the DOV.

Viol. Classification: Moderate

Citation: 40 CFR Chapter 266, SubChapter I, PT 266, SubPT H 266.102

Rqmt Prov: PERMIT Section V I.7.c.

Description: Failure to complete the daily CEMS audit for Boiler B-901, B-903, and B-903 on the date specified in the DOV.

Viol. Classification: Moderate

Citation: 40 CFR Chapter 266, SubChapter I, PT 266, SubPT H 266.102(e)(10)

Rqmt Prov: PERMIT Section V I.7.e.

Description: Failure to document daily CEMS audit with the legible name, time, and corrective actions for the dates specified in the DOV for Boiler B-901, B-902, and B-903.

Viol. Classification: Minor

Citation: 40 CFR Chapter 265, SubChapter I, PT 265, SubPT B 265.15(d)

Rqmt Prov: PERMIT Section II.B.2.

Description: Failure to include the name of the inspector, time and turnover days for the records of the <90 daily tank inspections for the dates listed on the DOV.

Viol. Classification: Minor

Citation: 40 CFR Chapter 265, SubChapter I, PT 265, SubPT B 265.15(d)

40 CFR Chapter 266, SubChapter I, PT 266, SubPT H 266.102(e)(8)(iii)

Rqmt Prov: PERMIT Section II.B.2.

Description: Failure to properly document the daily inspections of Boilers B-901, B-902, and B-903 with the inspector

name, time of inspection, observations, and corrective actions for the dates listed in the DOV.

Viol. Classification: Minor

Citation: 40 CFR Chapter 265, SubChapter I, PT 265, SubPT I 265.174

Description: Failure to timely complete week inspections of the <90 day hazardous waste container storage area for the weeks listed in the DOV.

Viol. Classification: Minor

Citation: 40 CFR Chapter 265, SubChapter I, PT 265, SubPT B 265.15(d)

40 CFR Chapter 265, SubChapter I, PT 265, SubPT I 265.174

Rqmt Prov: PERMIT Section II.B.2.

Description: Failure to include the inspections name and other required information on the records of the weekly inspections of the <90 day hazardous waste container storage area for the weeks listed in the DOV.

Viol. Classification: Moderate

Citation: 40 CFR Chapter 63, SubChapter C, PT 63, SubPT EEE 63.1206(c)(6)(ii)

Description: Failure to ensure that personnel maintaining the analyzer and instruments for the B-901, B-902, and B-903 Boilers at Unit 3 receive initial certification training as required under HWS MACT.

Viol. Classification: Moderate

Citation: 40 CFR Chapter 63, SubChapter C, PT 63, SubPT EEE 63.1206(c)(6)(vi)

Description: Failure to complete operator annual refresher training for one operator during 2011.

Viol. Classification: Moderate

Citation: 40 CFR Chapter 63, SubChapter C, PT 63, SubPT EEE 63.1206(c)(3)(i)(B)

40 CFR Chapter 63, SubChapter C, PT 63, SubPT EEE 63.1209(b)(4)

Description: Failure to set up the process code correctly to AWFCO when the span value of some CMS detectors is exceeded.

Viol. Classification: Minor

Citation: 40 CFR Chapter 265, SubChapter I, PT 265, SubPT B 265.15(d)

40 CFR Chapter 265, SubChapter I, PT 265, SubPT I 265.174

Description: Failure to ensure that weekly inspections of waste storage areas are completed properly. Specifically, safety equipment was not inspected and inspections were late or missed for the dates and equipment listed on the DOV.

Viol. Classification: Minor

Citation: 40 CFR Chapter 262, SubChapter I, PT 262, SubPT C 262.34(a)

Description: Failure to comply with the 90 day rule for waste storage in NOR 748.

Viol. Classification: Minor

Citation: 40 CFR Chapter 265, SubChapter I, PT 265, SubPT BB 265.1064

Description: Failure to document RCRA BB and CC applicability and compliance at FMTO.

Viol. Classification: Minor

Citation: 40 CFR Chapter 265, SubChapter I, PT 265, SubPT BB 265.1064

Description: Failure to properly document weekly inspections of the <90 day hazardous waste container storage area with the inspector name and other information for the weeks listed in the DOV.

Viol. Classification: Moderate

Citation: 40 CFR Chapter 265, SubChapter I, PT 265, SubPT B 265.15(d)

Rqmt Prov: PERMIT Section II.B.2.

Description: Failure to document daily <90 day tank inspections for turnover day listed on the DOV.

Notice of Intent Date: 05/11/2015 (1254301)

Disclosure Date: 09/18/2015

Viol. Classification: Major

Citation: 30 TAC Chapter 106, SubChapter K 106.261(a)(7)

Description: Failure to register the Catalyst Transfer System. Specifically, the PBR for the Catalyst Transfer System was never registered.

Notice of Intent Date: 05/27/2015 (1259026)

No DOV Associated

Notice of Intent Date: 05/27/2015 (1259032)

No DOV Associated

Notice of Intent Date: 05/27/2015 (1259037)

Disclosure Date: 09/25/2015

Viol. Classification: Moderate

Citation: 30 TAC Chapter 115, SubChapter H 115.725(a)(3)

30 TAC Chapter 115, SubChapter H 115.725(c)

30 TAC Chapter 115, SubChapter H 115.725(c)(3)

30 TAC Chapter 115, SubChapter H 115.726(e)

30 TAC Chapter 122, SubChapter B 122.132(e)(2)

Description: Failure to comply with permit requirements. Streams were identified that contain HRVOCs and are subject

to 30 TAC 115 Subchapter H, but are not following recordkeeping, monitoring, and reporting requirements.

Viol. Classification: Moderate
Citation: 40 CFR Chapter 61, SubChapter C, PT 61, SubPT FF 61.343(c)

Description: Failure to conduct inspections. Visual inspections of tanks in benzene waste were either conducted late or not conducted during the quarter.

Viol. Classification: Moderate
Citation: 30 TAC Chapter 101, SubChapter F 101.201(b)

Description: Failure to maintain records. Final records of non-reportable emissions events were created late.

Viol. Classification: Moderate
Citation: 30 TAC Chapter 101, SubChapter F 101.201
30 TAC Chapter 106, SubChapter K 106.263(g)
30 TAC Chapter 122, SubChapter B 122.145(2)(A)

Description: Failure to maintain records. Air contaminants from unauthorized fuel gas emission events and authorized Maintenance/Startup/Shutdown (MSS) activities were not reported or recorded.

Notice of Intent Date: 05/29/2015 (1259056)
Disclosure Date: 08/24/2015
Viol. Classification: Moderate
Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
Rqmt Prov: PERMIT Special Condition 4

Description: Failure to comply with permit requirements. Drain fill rates for numerous tanks were exceeded due to an automated programming error.

Notice of Intent Date: 05/28/2015 (1259093)
No DOV Associated

Notice of Intent Date: 05/29/2015 (1259098)
No DOV Associated

Notice of Intent Date: 05/26/2015 (1259107)
No DOV Associated

Notice of Intent Date: 06/03/2015 (1259028)
No DOV Associated

Notice of Intent Date: 06/01/2015 (1259102)
Disclosure Date: 07/27/2015
Viol. Classification: Moderate
Citation: 40 CFR Chapter 63, SubChapter C, PT 63, SubPT MMM 63.1368(f)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT MMM 63.1368(g)(1)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT A 63.9(h)

Description: Failure to comply with permit requirements. Specifically, the NOCS and first report were not submitted by the required due date.

Viol. Classification: Moderate
Citation: 40 CFR Chapter 63, SubChapter C, PT 63, SubPT EEEE 63.2346(a)(1)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT SS 63.983(b)(1)(i)(B)

Description: Failure to conduct annual AVO inspections. Specifically, an annual AVO inspection of a section of the closed vent system, the section from the SOHO tanks to the knock out pot before the control device, was not done for the years 2011 to current.

Notice of Intent Date: 06/09/2015 (1268962)
Disclosure Date: 11/16/2015
Viol. Classification: Moderate
Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)
Rqmt Prov: PERMIT SC 1
OP SC 21

Description: Failure to ensure that scrubber stack A36S531 emission comply with MEART CO limits. Specifically, the scrubber stack exceed the MAERT limit for CO emissions while clearing a vent header knockout pot.

Viol. Classification: Moderate
Citation: 30 TAC Chapter 101, SubChapter F 101.201(b)

Description: Failure to maintain final records for excess emission events within two weeks of each emissions event.

Notice of Intent Date: 06/10/2015 (1268975)
No DOV Associated

Notice of Intent Date: 06/10/2015 (1268977)

No DOV Associated

Notice of Intent Date: 06/11/2015 (1268982)

Disclosure Date: 11/06/2015

Viol. Classification: Moderate

Citation: 30 TAC Chapter 101, SubChapter A 101.10
30 TAC Chapter 122, SubChapter B 122.143(4)

Rqmt Prov: OP ST&C 2.E.

Description: Failure to report HRVOC flare annual emissions per online analyzer data. Specifically, estimated calculations were being used.

Notice of Intent Date: 06/25/2015 (1281938)

No DOV Associated

Notice of Intent Date: 06/29/2015 (1268984)

Disclosure Date: 12/10/2015

Viol. Classification: Moderate

Citation: 40 CFR Chapter 63, SubChapter C, PT 63, SubPT PPP 63.1423
40 CFR Chapter 63, SubChapter C, PT 63, SubPT PPP 63.1433
40 CFR Chapter 63, SubChapter C, PT 63, SubPT PPP 63.1439

Description: Failure to determine if wastewater streams (KO-6, KO-9, and Poly Jets) are exempt, Group 1, or Group 2, and include wastewater stream group information in the Notice of Compliance Status report and failed to maintain records associated with these streams as specified in 63.147 of HON as referenced by 63.1433 of Subpart PPP.

Notice of Intent Date: 07/07/2015 (1280740)

Disclosure Date: 09/24/2015

Viol. Classification: Moderate

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

Rqmt Prov: PERMIT Special Condition 11

Description: Failure to monitor connectors. Twenty connectors in light liquid or gas/vapor service were incorrectly identified as insulated in the LDAR system and were not being monitored as required.

Viol. Classification: Minor

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

Rqmt Prov: PERMIT SC 11

Description: Failure to tag and monitor two valves and eight connector in VOC light liquid service as required.

Viol. Classification: Minor

Citation: 40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.162(f)(1)

Description: Failure to tag a leaking pump in VOC light liquid and OHAP heavy liquid service.

Viol. Classification: Minor

Citation: 40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.163(b)(3)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.181(c)

Description: Failure to properly complete the weekly pump inspection forms for the weeks of October 13, 2014, June 6, 2015 and October 12, 2015.

Viol. Classification: Minor

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

Rqmt Prov: PERMIT SC 10

Description: Failure to ensure that the AVO weekly inspection forms in use properly document all of the required connectors to be inspected.

Viol. Classification: Minor

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

Rqmt Prov: PERMIT SC 10

Description: Failure to correctly complete the AVO weekly inspection form for the weeks of October 12, 2015, October 21, 2015, and December 1, 2015.

Viol. Classification: Moderate

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

Description: Failure to manage and/or maintain documentation demonstrating that fugitive components in anhydrous HCl service has been managed in accordance with the representation in the permit applications.

Viol. Classification: Moderate

Citation: 30 TAC Chapter 122, SubChapter C 122.222(k)

Description: Failure to submit and off-permit notification for Title V permit No. O02311 when the internally documented PBR for the particulate emissions from the Quat Unit cooling tower were revised.

Viol. Classification: Minor

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

Rqmt Prov: PERMIT SC 9.D.

Description: Failure to ensure that the primary flow meter measuring the throughput of D-60 meets accuracy requirements.

Viol. Classification: Minor

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

Rqmt Prov: PERMIT SC 16, 17, 18, 20, and 21

Description: Failure to ensure that all information required to be documented for the MSS monthly records is maintained.

Notice of Intent Date: 07/17/2015 (1280742)

No DOV Associated

Notice of Intent Date: 07/28/2015 (1280743)

No DOV Associated

Notice of Intent Date: 07/30/2015 (1280751)

No DOV Associated

Notice of Intent Date: 07/29/2015 (1280753)

Disclosure Date: 05/09/2016

Viol. Classification: Moderate

Citation: 30 TAC Chapter 115, SubChapter C 115.221

Description: Failure to equip Gasoline tank EPN BSRST202 with controls for gasoline.

Notice of Intent Date: 08/03/2015 (1280758)

No DOV Associated

Notice of Intent Date: 08/14/2015 (1282182)

Disclosure Date: 01/26/2016

Viol. Classification: Minor

Citation: 40 CFR Chapter 63, SubChapter C, PT 63, SubPT G 63.152(b)

Description: Failure to include the following in the HON NESHAPS NOCS report submitted on November 19, 2015 for the B19, B23, and B68 operations: Ally 2 A/B is not listed in the HON NOCS as a Group 2 storage vessel; Ally 1 1 R-1 reactor unit was not listed in the Emission Point Group Determination section of the HON NOCS, Ally 1 1 surge control vessels D-330 and D-600 were not listed on HON NOCS subpart H, Ally 1 FTB-603, FTO, Kiln CVS were not listed on HON NOCS Subpart H, and Ally 1 not all parts of the C

Viol. Classification: Minor

Citation: 30 TAC Chapter 122, SubChapter B 122.132(e)

Description: Failure to prevent the following errors in Title V Permit No. O2208 dates April 30, 2014: Ally 2 V-1219 A/B is missing from the permit and OLD MACT citations were missing in the permit.

Viol. Classification: Minor

Citation: 30 TAC Chapter 101, SubChapter A 101.10

30 TAC Chapter 115, SubChapter D 115.354(10)

30 TAC Chapter 115, SubChapter D 115.354(11)

30 TAC Chapter 115, SubChapter D 115.354(3)

30 TAC Chapter 115, SubChapter D 115.356(2)

30 TAC Chapter 115, SubChapter D 115.356(5)

30 TAC Chapter 115, SubChapter H 115.781(a)

30 TAC Chapter 115, SubChapter H 115.781(b)

30 TAC Chapter 115, SubChapter H 115.786(e)

30 TAC Chapter 115, SubChapter H 115.786(g)

4F TWC Chapter 63, SubChapter A 63.160

40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.174(c)(1)(ii)

40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.181

4F TWC Chapter 63, SubChapter A 63.182

40 CFR Chapter 63, SubChapter C, PT 63, SubPT FFFF 63.2480

Rqmt Prov: PERMIT SCs 16E and 16K

Description: Failure to monitor and include 461 connectors, 99 valves, and four relief valves in the fugitive monitoring program and emissions calculations beginning January 9, 1998.

Viol. Classification: Minor

Citation: 40 CFR Chapter 63, SubChapter C, PT 63, SubPT EEEE 63.2343

40 CFR Chapter 63, SubChapter C, PT 63, SubPT EEEE 63.2346

40 CFR Chapter 63, SubChapter C, PT 63, SubPT EEEE 63.2396

Description: Failure to include the following in the NOCS report for Subpart EEEE submitted by Blue Cube Operations

LLC: unloading of crude material from B23 into D-600 was not listed on Attachment 1 of the October 3, 2007 NOCS report.

Notice of Intent Date: 08/28/2015 (1282186)
No DOV Associated

Notice of Intent Date: 08/26/2015 (1282189)
No DOV Associated

Notice of Intent Date: 08/26/2015 (1282190)
No DOV Associated

Notice of Intent Date: 09/02/2015 (1287132)
Disclosure Date: 10/29/2015

Viol. Classification: Moderate

Citation: 40 CFR Chapter 63, SubChapter C, PT 63, SubPT F 63.100(g)

Description: Failure to include the V-26A and B storage tanks (A42U3ST26A and A42U3ST26B) and associated piping (A42U3FY26) in the HON Notice of Compliance Status report.

Notice of Intent Date: 09/18/2015 (1287134)
No DOV Associated

Notice of Intent Date: 09/29/2015 (1287135)
Disclosure Date: 11/02/2015

Viol. Classification: Moderate

Citation: 30 TAC Chapter 327 327.5(b)(1)

30 TAC Chapter 327 327.5(b)(2)

30 TAC Chapter 327 327.5(b)(3)

30 TAC Chapter 327 327.5(c)(1)

30 TAC Chapter 327 327.5(c)(2)

30 TAC Chapter 327 327.5(c)(3)

Description: Failure to submit a request for approval of the response plan and for a 180 day extension of excavation activities within 30 days of spill that occurred on march 30, 2015 and March 31, 2015. Failure to submit a final spill report documenting cleanup of the spill within 180 days.

Notice of Intent Date: 10/06/2015 (1288495)
Disclosure Date: 01/25/2016

Viol. Classification: Moderate

Citation: 40 CFR Chapter 61, SubChapter C, PT 61, SubPT FF 61.343(a)(1)(i)(A)

40 CFR Chapter 61, SubChapter C, PT 61, SubPT FF 61.343(c)

40 CFR Chapter 61, SubChapter C, PT 61, SubPT FF 61.357(d)(1)

40 CFR Chapter 61, SubChapter C, PT 61, SubPT FF 61.357(d)(2)

40 CFR Chapter 61, SubChapter C, PT 61, SubPT FF 61.357(d)(6)

40 CFR Chapter 61, SubChapter C, PT 61, SubPT FF 61.357(d)(7)

40 CFR Chapter 61, SubChapter C, PT 61, SubPT FF 61.357(e)

40 CFR Chapter 61, SubChapter C, PT 61, SubPT FF 61.357(f)

Description: Failure to complete initial and annual Method 21 monitoring on one BWON applicable tank, failure to complete initial and quarterly visual inspection of one BWON applicable tank, and failure to complete applicable reporting associated with the BWON applicable tank.

Viol. Classification: Moderate

Citation: 40 CFR Chapter 61, SubChapter C, PT 61, SubPT FF 61.345(a)(1)(i)

40 CFR Chapter 61, SubChapter C, PT 61, SubPT FF 61.345(b)

40 CFR Chapter 61, SubChapter C, PT 61, SubPT FF 61.357(d)(1)

40 CFR Chapter 61, SubChapter C, PT 61, SubPT FF 61.357(d)(2)

40 CFR Chapter 61, SubChapter C, PT 61, SubPT FF 61.357(d)(6)

40 CFR Chapter 61, SubChapter C, PT 61, SubPT FF 61.357(d)(7)

Description: Failure to complete initial and annual Method 21 monitoring on one BWON applicable container, failure to complete initial and quarterly visual inspections on one BWON applicable container, and failure to complete applicable reporting associated with the BWON applicable container.

Viol. Classification: Moderate

Citation: 40 CFR Chapter 61, SubChapter C, PT 61, SubPT FF 61.349(f)

Description: Failure to visually inspect each closed-vent system and control device quarterly.

Notice of Intent Date: 10/15/2015 (1289510)
No DOV Associated

Notice of Intent Date: 10/19/2015 (1289512)

Disclosure Date: 05/19/2016

Viol. Classification: Minor

Citation: 30 TAC Chapter 115, SubChapter D 115.354(1)
30 TAC Chapter 115, SubChapter D 115.354(2)
40 CFR Part 63, Subpart H 63.168
40 CFR Part 63, Subpart H 63.174

Rqmt Prov: PERMIT SC 15

Description: Failure to conduct fugitive monitoring of 19 valves and 69 connectors in VOC light liquid or gas/vapor service. Specifically, the components were not included in the fugitive monitoring database and were not being monitored as required.

Notice of Intent Date: 10/20/2015 (1289524)

No DOV Associated

Notice of Intent Date: 10/22/2015 (1289527)

Disclosure Date: 12/04/2015

Viol. Classification: Moderate

Citation: 40 CFR Chapter 82, SubChapter C, PT 82, SubPT F 82.156(l)(3)

Description: Failure to repair a greater than 35% 12-month leak loss rate within 120 days after discovery on May 6, 2015 (PGA mechanical refrigeration unit MRU-3B).

Notice of Intent Date: 10/22/2015 (1289528)

No DOV Associated

Notice of Intent Date: 10/22/2015 (1289529)

Disclosure Date: 11/09/2015

Viol. Classification: Moderate

Citation: 30 TAC Chapter 115, SubChapter B 115.136(a)(2)

Rqmt Prov: PERMIT SC 4

OP ST&C 1.A.

Description: Failure to maintain records demonstrating compliance with Reg. V VOC Water Separation for D-626. Also, vents currently directed to ER-628 reboiler violate the NSR permit condition that required "glycol dehydration vent exhausting VOC from DW-6 and DW-9 vent streams be directed to the BSRF200 flare".

Disclosure Date: 05/09/2016

Viol. Classification: Moderate

Citation: 30 TAC Chapter 111, SubChapter A 111.111(a)(4)(A)(ii)

Description: Failure to conduct daily flare observations on four flares at least 1 hour after sunrise.

Viol. Classification: Minor

Citation: 30 TAC Chapter 115, SubChapter H 115.725(c)(2)

Description: Failure to recognize two pressure relief valves that do not meet the monitoring, inspection, and recordkeeping requirements for HRVOC pressure relief valves not routed to flares.

Viol. Classification: Minor

Citation: 40 CFR Chapter 273, SubChapter I, PT 273, SubPT A 273.1
30 TAC Chapter 335, SubChapter H 335.261

Description: Failure to properly store Universal Waste-Light Bulbs.

Notice of Intent Date: 10/28/2015 (1289531)

No DOV Associated

Notice of Intent Date: 11/17/2015 (1299922)

Disclosure Date: 04/14/2016

Viol. Classification: Moderate

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

Rqmt Prov: PERMIT SC 13

PERMIT SC 19

PERMIT SC 2

PERMIT SC 3 and 13.B.

PERMIT SC 9

OP SC No. 6

Description: Failure to maintain the 12-month rolling total of emissions for the following plants: Polyethylene 4, Polyethylene 3, Salt Dome, Freeport Marine Terminal, Waste Water Treatment, and Adhesive Polymers PMDI, SPC, POPG MSS, and EO Distribution.

Viol. Classification: Moderate
Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
Rqmt Prov: PERMIT 19
PERMIT SC 3 and 13.B.

Description: Failure to comply with record keeping requirements for the Freeport Marine Terminal and the Adhesive Polymers Unit, PMDI, Picloram, POPG MSS, and EO Distribution.

Viol. Classification: Moderate
Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
Rqmt Prov: PERMIT 13.A.
PERMIT 2.C.
PERMIT 6.B.C.
PERMIT 9.D. B.
PERMIT SC 19 A, B, C
PERMIT SC 2.A.
PERMIT SC 3 and 13.B.

Description: Failure to comply with record keeping requirements for the Freeport Marine Terminal, Wastewater treatment, Adhesive polymers, Light Hydrocarbon 8, Light Hydrocarbon 7, Salt Dome, Polyethylene 4, and Polyethylene 3 units, Polyglycol Amines, Phenol Glycol Ethers, SPC, Picloram, POPG MSS, and EO Distribution.

Viol. Classification: Moderate
Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
Rqmt Prov: PERMIT 11.C.
PERMIT 20.A.
PERMIT 31.C.
PERMIT 4.C.
PERMIT 5.C. and 13.D.
PERMIT SC 4.C.

Description: Failure to comply with calibration and/or calibration record keeping requirements for the Freeport Marine Terminal, Light Hydrocarbon 8, Polyethylene 3, Propane Dehydrogenation, Light Hydrocarbon 7, and Salt Dome units..

Viol. Classification: Moderate
Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
Rqmt Prov: PERMIT 11.B. and 13.G.

Description: Failure to ensure there is a process in place to replace thermocouples on flares when data indicates failure.

Viol. Classification: Minor
Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
Rqmt Prov: PERMIT 10.D

Description: Failure to record the locations and/or identifiers where the purge gas or steam enters the process equipment or storage vessel and the exit points for the exhaust gases.

Viol. Classification: Moderate
Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
Rqmt Prov: PERMIT 10.D.

Description: Failure to record the volumetric flow rate.

Viol. Classification: Moderate
Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
Rqmt Prov: PERMIT 11.C.2.
PERMIT 31.C.2
PERMIT 4.C.2.

Description: Failure to comply with the functionality test and/or recordkeeping requirements for the Propane Dehydrogenation, Light Hydrocarbon 7, and Salt Dome units.

Disclosure Date: 10/18/2016

Viol. Classification: Moderate
Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
Rqmt Prov: PERMIT SC 5

Description: Failure to ensure that all components subject to the LDAR Program are tagged and monitored. Specifically, additional components submit to the LDAR Program were discovered during a maintenance event that were not tagged and monitored.

Viol. Classification: Moderate
Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
Rqmt Prov: PERMIT SC 10.D.

Description: Failure to operate the sample ports so that there is no air leakage into the sample probe.

Viol. Classification: Moderate
Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
Rqmt Prov: PERMIT SC 3

Description: Failure to comply with VOC sampling requirements.

Viol. Classification: Moderate

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

Description: Failure to properly record the details specified of Special Condition 2.E of NSRP 83839 (Site Functions 1).

Viol. Classification: Moderate

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

Rqmt Prov: PERMIT SWC 6E

Description: Failure to ensure that new paints used on-site meet permit limitations (Site Functions 1). Specifically, new paints were approved to be used on-site that did not meet permit limitations due to evaluating new paints incorrectly.

Viol. Classification: Moderate

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

Rqmt Prov: PERMIT SC 1

Description: Failure to demonstrate compliance with hourly MAERT limits (Site Functions 1).

Viol. Classification: Moderate

Citation: 30 TAC Chapter 101, SubChapter A 101.10(b)(2)(A)

Description: Failure to properly report emission in the Annual Air Emission Inventory (Site Function 1). Specifically, emissions were over-reported due to calculation errors.

Viol. Classification: Moderate

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

Description: Failure to ensure correct permit representations (Site Functions 1). Specifically, there are multiple incorrect representation in the permit application.

Notice of Intent Date: 11/19/2015 (1299923)

No DOV Associated

Notice of Intent Date: 11/19/2015 (1299926)

Disclosure Date: 11/30/2016

Viol. Classification: Moderate

Citation: 30 TAC Chapter 115, SubChapter D 115.354(11)

Description: Failure to monitor 12,885 new connectors for leaks within 30 days.

Notice of Intent Date: 11/16/2015 (1299936)

No DOV Associated

Notice of Intent Date: 12/01/2015 (1296284)

Disclosure Date: 01/26/2016

Viol. Classification: Moderate

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

Rqmt Prov: PERMIT Special Condition No. 1

Description: Failure to comply with hourly allowable limits for CO, NOx, VOC and SO2 of NSRP No. 100787 from the Small Elevated Flare FS-957 (EPN OC4F957).

Viol. Classification: Moderate

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

Rqmt Prov: PERMIT Special Condition No. 1

Description: Failed to comply with hourly emission allowable limits for CO, NOx, VOC, Propylene and SO2 of NSRP No. 100787 from the Merox Elevated Flare FS-956 (EPN OC4F959).

Viol. Classification: Moderate

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

Rqmt Prov: PERMIT Special Condition No. 1

Description: Failed to comply with hourly emission allowable limits for CO of NSRP No. 100787 for the Low Firing Mode (MSS) of PDH-1 Heaters H-310, H-320, and H-340 (EPNs OCMEH310, OCMEH320, OCMEH330, OCMEH340).

Viol. Classification: Moderate

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

Rqmt Prov: PERMIT Special Condition No. 13

Description: Failed to comply with hourly emission factor of NOx as specified in SC13 of NSRP No. 100787 for each of the four heaters H-310, H-320, H-330 and H-340 (EPNS OC4H310, OC4H320, OC4H330, OC4H340) primarily during Low Firing mode (MSS).

Viol. Classification: Moderate

Citation: 30 TAC Chapter 117, SubChapter B 117.340(e)

30 TAC Chapter 117, SubChapter G 117.8100(a)(1)(B)(iii)

Rqmt Prov: PERMIT Special Condition No. 19

Description: Failed to measure and record CO concentration from the Heater H-310 (EPN OC4H310), Heater H-320 (EPN OC4H320), Heater H-330 (EPN OC4H330), and the Heater 340 (EPN OC4H340 due to insufficient range for CO on the continuous emission monitoring system (CEMS). Calibration gases for the new CO range were

not immediately available.

Viol. Classification: Moderate

Citation: 30 TAC Chapter 101, SubChapter F 101.201

Description: Failure to timely notify TCEQ and appropriate pollution control agencies of an emissions event exceeding a reportable quantity for CO, NOx, propylene and propane and failed to complete a final record of the emission event within 14 days.

Viol. Classification: Moderate

Citation: 30 TAC Chapter 115, SubChapter B 115.122(a)(1)(B)

Description: Failed to route a process vent stream from the cold box to control.

Disclosure Date: 12/01/2016

Viol. Classification: Moderate

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

Rqmt Prov: PERMIT SC 13

Description: Failure to comply with the CO concentration specified in NSRP #100787 during Low Firing Mode (MSS) for PDH-1 Heaters H-310, H-320, H-330, and H-340, EPN OCMEH310, OCMEH320, OCMEH330, OCMEH340.

Viol. Classification: Moderate

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

Rqmt Prov: PERMIT NSRP #100787/PSDTX1314M1

Description: Failed to comply with the routine hourly emission allowable limits for CO, NOx, VOC, ethylene, and SO2 of NSRP # 100787 from the Multi-Point Ground Flare FX-955, EPN OC4F9551.

Notice of Intent Date: 12/01/2015 (1296300)

No DOV Associated

Notice of Intent Date: 12/10/2015 (1301184)

Disclosure Date: 06/28/2016

Viol. Classification: Major

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

30 TAC Chapter 122, SubChapter B 122.143(4)

Rqmt Prov: PERMIT SC 1

OP SC 17

Description: Failure to obtain authorization for the residual methyl amine and ethylenediamine vapors from railcar into storage tanks which are aspirated through a venture into an open sump.

Notice of Intent Date: 12/11/2015 (1301185)

No DOV Associated

Notice of Intent Date: 12/07/2015 (1301187)

No DOV Associated

Notice of Intent Date: 12/15/2015 (1299934)

Disclosure Date: 04/25/2016

Viol. Classification: Minor

Citation: 30 TAC Chapter 115, SubChapter D 115.354(2)(C)

30 TAC Chapter 115, SubChapter D 115.354(3)

40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.168(b)

4F TWC Chapter 63, SubChapter A 63.168(c)

40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.168(d)

40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.174(a)

40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.182(d)(2)(i)

40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.182(d)(2)(ii)

Rqmt Prov: PERMIT 20996 Special Condition 8E

PERMIT 20996 Special Condition 8f

Description: Failure to conduct periodic Method 21 fugitive monitoring on 24 valves and 91 connectors.

Notice of Intent Date: 12/18/2015 (1301331)

Disclosure Date: 05/20/2016

Viol. Classification: Minor

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

40 CFR Chapter 81, SubChapter C, PT 81, SubPT D 82.13(d)

Rqmt Prov: OP Special Condition 26C

Description: Failure to maintain a record of the initial notification and any updates to the initial notification for five years.

Viol. Classification: Minor

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

40 CFR Chapter 81, SubChapter C, PT 81, SubPT D 82.13(d)

Rqmt Prov: OP Special Condition 26C

Description: Failure to maintain records of submitted quarterly reports for five years.

Notice of Intent Date: 01/13/2016 (1307241)
No DOV Associated

Notice of Intent Date: 01/12/2016 (1307243)
Disclosure Date: 04/08/2016

Viol. Classification: Moderate

Citation: 30 TAC Chapter 115, SubChapter H 115.725(a)(1)(C)
30 TAC Chapter 115, SubChapter H 115.725(a)(4)(A)
30 TAC Chapter 115, SubChapter H 115.725(a)(4)(B)
30 TAC Chapter 115, SubChapter H 115.725(a)(4)(C)
30 TAC Chapter 115, SubChapter H 115.725(a)(5)
30 TAC Chapter 115, SubChapter H 115.726(b)(3)

Description: Failure to maintain a complete monitoring plan at the Polyethylene 4 Unit for uncontrolled process vents that contain HRVOCs and failure to update the hourly production rate limits in the monitoring plan after HRVOC testing was conducted.

Viol. Classification: Moderate

Citation: 30 TAC Chapter 115, SubChapter H 115.725(c)(3)

Description: Failure to maintain complete monitoring plans for affected pressure relief valves containing HRVOCs at Polyethylene 4. Specifically, the plan are incomplete.

Viol. Classification: Moderate

Citation: 30 TAC Chapter 115, SubChapter H 115.725(c)(1)
30 TAC Chapter 115, SubChapter H 115.725(c)(3)
30 TAC Chapter 115, SubChapter H 115.725(c)(3)(D)
30 TAC Chapter 115, SubChapter H 115.726(c)(1)
30 TAC Chapter 115, SubChapter H 115.726(c)(2)
30 TAC Chapter 115, SubChapter H 115.726(i)

Description: Failure to inspect on a quarterly basis and calibrate as required the affected pressure transmitters and pressure relief valves containing HRVOCs at Polyethylene 4 and failure to maintain hourly records on a monthly basis in the production plant's files as specified in Poly 4's monitoring plans.

Viol. Classification: Moderate

Citation: 30 TAC Chapter 115, SubChapter H 115.725(a)(1)(B)
30 TAC Chapter 115, SubChapter H 115.725(a)(4)(D)

Description: Failure to conduct calibrations and quarterly inspection of the check hopper scales used to measure the hourly production rate (production rate, as measure by the check hopper scales, is the parameter selected to be monitored that directly affects the HRVOC emissions from the vent.

Viol. Classification: Moderate

Citation: 30 TAC Chapter 115, SubChapter H 115.725(a)(4)
30 TAC Chapter 115, SubChapter H 115.726(b)(2)
30 TAC Chapter 115, SubChapter H 115.726(i)

Description: Failure to file hourly records of production rate on a monthly basis in the plant's files, as specified in the monitoring plans for uncontrolled HRVOC vents.

Notice of Intent Date: 01/12/2016 (1307247)
No DOV Associated

Notice of Intent Date: 01/11/2016 (1307251)
No DOV Associated

Notice of Intent Date: 01/11/2016 (1307254)
No DOV Associated

Notice of Intent Date: 01/15/2016 (1307614)
Disclosure Date: 11/29/2016

Viol. Classification: Moderate

Citation: 40 CFR Chapter 61, SubChapter C, PT 61, SubPT FF 61.342(f)
40 CFR Chapter 61, SubChapter C, PT 61, SubPT FF 61.356

Description: Failure to include notices in off site waste shipments containing benzene. Specially, notices that the waste contains benzene was not included for benzene containing waste that is sent via hard pipe between Dow and the third party control and treatment devices.

Disclosure Date: 01/10/2017

Viol. Classification: Moderate

Citation: 40 CFR Chapter 63, SubChapter C, PT 63, SubPT EEE 63.1209(b)(2)

Description: Failure to ensure that the process control code on the replacement stack gas flow meter on FTB-603 is updated to account for a change in the meter which resulted in inaccurate flow data.

Viol. Classification: Moderate

Citation: 30 TAC Chapter 305, SubChapter F 305.125(1)

Rqmt Prov: PERMIT Table V.I.4.

Description: Failure to comply with the RCRA permit emission limit for free chlorine for F-210 during an approximately nine hour period during preparations for compliance burn testing. While trying to establish new lower limits for scrubber pH and L/G parameters, too much chlorine was allowed to be emitted to the atmosphere.

Notice of Intent Date: 02/01/2016 (1312240)

Disclosure Date: 04/26/2016

Viol. Classification: Moderate

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

Rqmt Prov: PERMIT Special Condition No. 11.A.

Description: Failure to ensure that calibration gases used to calibrate the MiniRae 3000 instruments are current and not expired.

Viol. Classification: Moderate

Citation: 30 TAC Chapter 122, SubChapter B 122.132(e)

40 CFR Chapter 70, SubChapter C, PT 70.70.5(c)

Description: Failure to ensure that Title V Permit O2215 is accurate. Specifically, the permit is missing citations relative to unloading operations, the correct citation in the Title V for VOC loading with true vapor pressure less than 0.5 psia instead of 90% overall controls option citation, the permit is missing the alternative compliance option provided in § 115.764(e)(2), and didn't include Subchapter E, Division 6: for Industrial Cleaning Solvents.

Notice of Intent Date: 02/01/2016 (1312253)

Disclosure Date: 04/26/2016

Viol. Classification: Minor

Citation: 40 CFR Chapter 63, SubChapter C, PT 63, SubPT FFFF 63.2515(b)

40 CFR Chapter 63, SubChapter C, PT 63, SubPT A 63.9(b)(2)

Description: Failure to submit an accurate updated initial notification on July 1, 2008. Relative the Polyethylene 4 Plant, specifically the updated initial Notification indicated that Polyethylene 4 was no longer subject to MON because the process unit no longer processed, used, or generated any of the organic hazardous air pollutants (OHAPs) or hydrogen halide/ halogen HAP. Isopar H, which is used as a carrier solvent, requires that the Polyethylene 4 plant continues to be subject to the MON.

Viol. Classification: Minor

Citation: 40 CFR Chapter 63, SubChapter C, PT 63, SubPT FFFF 63.2520(d)

Description: Failure to submit a MON Notification of Compliance Status report for the Polyethylene 4 plant within 150 days after the applicable compliance date specified in section 63.2445.

Viol. Classification: Moderate

Citation: 40 CFR Chapter 63, SubChapter C, PT 63, SubPT FFFF 63.2520(b)

40 CFR Chapter 63, SubChapter C, PT 63, SubPT FFFF 63.2520(e)

Description: Failure to submit semiannual MON Compliance Reports for the Polyethylene 4 process unit since the May 10, 2008 compliance date.

Viol. Classification: Moderate

Citation: 30 TAC Chapter 122, SubChapter B 122.132(e)

40 CFR Chapter 70, SubChapter C, PT 70.70.5(c)

Description: Failure to include 40 CFR 63 Subpart FFFF as an applicable regulation for the Polyethylene 4 process unit with the Title V permit (O2215 dated August 13, 2014 and previous versions).

Notice of Intent Date: 02/05/2016 (1313478)

Disclosure Date: 01/05/2017

Viol. Classification: Moderate

Citation: 30 TAC Chapter 305, SubChapter F 305.125(1)

Rqmt Prov: PERMIT Section II C.1.

Description: Failure to ensure that monthly waste fees paid take into account all waste management methods as required for the time period of 1/1/2011 through 12/31/16.

Viol. Classification: Moderate

Citation: 30 TAC Chapter 305, SubChapter F 305.125(1)

Rqmt Prov: PERMIT Section IV C.2.

Description: Failure to ensure that the QA/QC program used for waste analyses for waste identification or verification is consistent with the TCEQ QAPP for the time period of 3/2011 through 3/2016.

Notice of Intent Date: 02/04/2016 (1313509)

No DOV Associated

Notice of Intent Date: 02/10/2016 (1313486)

Disclosure Date: 06/28/2016

Viol. Classification: Moderate

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

Rqmt Prov: PERMIT SC 22.B.

Description: Failure to maintain records of water flow meter calibration associated with control devices SC-2 Scrubber (EPN B113SV2), SC-2 Kettle Scrubber (EPN B13SV3), T-22 Scrubber (EPN B13SV22), and SC-1 Scrubber (EPN B43SV1).

Viol. Classification: Moderate

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

Rqmt Prov: OP Periodic Monitoring Summary

Description: Failure to maintain records of water flow meter calibration associated with control device T-384 Scrubber (EPN B17SV384).

Viol. Classification: Moderate

Citation: 40 CFR Chapter 63, SubChapter C, PT 63, SubPT PPP 63.1439(e)(5)

Description: Failure to include two applicable heat exchanges (E-101 and E-102) in the PGA facility's initial PPP MACT NOCS submittal.

Viol. Classification: Moderate

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

40 CFR Chapter 63, SubChapter C, PT 63, SubPT PPP 63.1434

40 CFR Part 63, Subpart H 63.168

Rqmt Prov: PERMIT SC 6

Description: Failure to include an automatic block valve on the propylene oxide header into the IPG plant in the fugitive monitoring program.

Disclosure Date: 12/13/2016

Viol. Classification: Moderate

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

40 CFR Part 63, Subpart H 63.168

40 CFR Part 63, Subpart H 63.174

Rqmt Prov: PERMIT SC 6

Description: Failure to identify and monitor 24 fugitive components in the PGA plant in Ethylene Oxide service.

Viol. Classification: Moderate

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

Rqmt Prov: PERMIT SC 6

Description: Failure to identify and monitor 28 fugitive components in the IPG plant in Acetic Acid service.

Notice of Intent Date: 02/09/2016 (1313535)

Disclosure Date: 05/11/2016

Viol. Classification: Moderate

Citation: 30 TAC Chapter 101, SubChapter A 101.10

Rqmt Prov: PERMIT NSR 6383

OP Title V Permit O2217 SC 2.E

Description: Failure to accurately report Air Emissions Inventory (AEI) data. Emissions reported under Air Emissions Inventory (AEI) were based on erroneous calculations.

Viol. Classification: Moderate

Citation: 30 TAC Chapter 115, SubChapter F 115.541

Rqmt Prov: OP Title V Permit O2217, SC 5

Description: Failure to document compliance with inspection, monitoring, testing, or recordkeeping requirements of 30 TAC Chapter 115, Subchapter F, Division 3. The railcar washing facility has been degassing railcars subject to control under 30 TAC Chapter 115, Subchapter F, Division 3 (Texas Reg Degassing rule); however, there is no documentation of compliance with inspection, monitoring, testing, or recordkeeping requirements.

Viol. Classification: Moderate

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

Rqmt Prov: PERMIT NSR 6383, SC 8E

Description: Failure to conduct weekly inspections on flanges by visual, audible, and/or olfactory means by operating personnel walk-through.

Notice of Intent Date: 02/17/2016 (1313543)

Disclosure Date: 05/27/2016

Viol. Classification: Moderate

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

Rqmt Prov: PERMIT SC 1

Description: Failure to ensure that the fugitive component representation in NSRP 19041 application is correct.

Viol. Classification: Moderate

Citation: 30 TAC Chapter 115, SubChapter D 115.354

30 TAC Chapter 116, SubChapter B 116.115(c)

40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.160(a)

Rqmt Prov: PERMIT SCs 20 and 21

Description: Failure to identify and monitor sixteen fugitive components.

Notice of Intent Date: 03/01/2016 (1319251)

Disclosure Date: 11/09/2016

Viol. Classification: Moderate

Citation: 40 CFR Chapter 60, SubChapter C, PT 60, SubPT NNN 60.660(a)
40 CFR Chapter 60, SubChapter C, PT 60, SubPT NNN 60.660(b)
40 CFR Part 60, Subpart NNN 60.662
40 CFR Chapter 60, SubChapter C, PT 60, SubPT NNN 60.663(f)
40 CFR Chapter 60, SubChapter C, PT 60, SubPT NNN 60.664(a)
40 CFR Chapter 60, SubChapter C, PT 60, SubPT NNN 60.664(b)
40 CFR Chapter 60, SubChapter C, PT 60, SubPT NNN 60.664(e)
40 CFR Chapter 60, SubChapter C, PT 60, SubPT NNN 60.664(f)
40 CFR Chapter 60, SubChapter C, PT 60, SubPT NNN 60.664(g)
40 CFR Chapter 60, SubChapter C, PT 60, SubPT NNN 60.664(h)
40 CFR Chapter 60, SubChapter C, PT 60, SubPT NNN 60.665(a)
40 CFR Chapter 60, SubChapter C, PT 60, SubPT NNN 60.665(b)(4)
40 CFR Chapter 60, SubChapter C, PT 60, SubPT NNN 60.665(h)
40 CFR Chapter 60, SubChapter C, PT 60, SubPT NNN 60.665(l)
40 CFR Chapter 60, SubChapter C, PT 60, SubPT NNN 60.665(p)
40 CFR Chapter 60, SubChapter C, PT 60, SubPT A 60.7(a)(1)
40 CFR Chapter 60, SubChapter C, PT 60, SubPT A 60.7(a)(3)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT G 63.110(d)(6)

Description: Failure to comply with NSPS NNN testing, monitoring recordkeeping, and reporting requirements for distillation columns T-700 (B13GBT700) and T-57A Evaporator (B13GBT57).

Notice of Intent Date: 03/11/2016 (1319400)

No DOV Associated

Notice of Intent Date: 03/14/2016 (1322417)

No DOV Associated

Notice of Intent Date: 03/14/2016 (1322447)

Disclosure Date: 08/03/2016

Viol. Classification: Major

Citation: 30 TAC Chapter 106, SubChapter K 106.262(3)

Description: Failure to submit a notification using Form PI-7 within ten days following the installation or modification of facilities.

Notice of Intent Date: 04/01/2016 (1323075)

Disclosure Date: 03/29/2016

Viol. Classification: Moderate

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

Rqmt Prov: PERMIT Special Condition 7D

Description: Failure to maintain records of calculated flare data and the methods used to obtain the calculations during instances that the process historian was unable to capture the data.

Disclosure Date: 08/19/2016

Viol. Classification: Moderate

Citation: 30 TAC Chapter 111, SubChapter A 111.111

Description: Failure to perform quarterly visible emission check on a bag filter as required.

Viol. Classification: Moderate

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

Rqmt Prov: PERMIT Special Condition 7

Description: Failure to maintain records for estimates of missed data for the flare or methods used to estimate the missing data.

Viol. Classification: Moderate

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

30 TAC Chapter 122, SubChapter B 122.145(2)(C)

5C THSC Chapter 382 382.085(b)

Rqmt Prov: OP General Terms & Conditions

Description: Failure to submit a semi-annual Title V compliance report within 30 days of the report period as required.

Viol. Classification: Moderate
Citation: 40 CFR Chapter 63, SubChapter C, PT 63, SubPT FFFF 63.2520(d)(2)
Description: Failure to include information regarding the closed vent system in the MON NOCS.
Viol. Classification: Minor
Citation: 30 TAC Chapter 111, SubChapter A 111.111(a)(4)(A)(ii)
Description: Failure to conduct 98% of the required daily flare observations.
Viol. Classification: Minor
Citation: 40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.167(a)(1)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT FFFF 63.2480
Rqmt Prov: PERMIT Special Condition 19.E.
Description: Failure to cap open ended lines. Specifically, three open ended lines in formaldehyde services were discovered.
Viol. Classification: Minor
Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT FFFF 63.2480(b)(4)
Rqmt Prov: PERMIT Special Condition 19
Description: Failure to include five connectors in VOC service in the fugitive monitoring program.
Disclosure Date: 11/30/2016
Viol. Classification: Major
Citation: 30 TAC Chapter 122, SubChapter B 122.121
Description: Failed to include various operating equipment in Title V Federal Operating Permit O2220.
Notice of Intent Date: 03/28/2016 (1323810)
No DOV Associated
Notice of Intent Date: 04/07/2016 (1329340)
No DOV Associated
Notice of Intent Date: 04/07/2016 (1331424)
Disclosure Date: 11/09/2016
Viol. Classification: Moderate
Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
Rqmt Prov: PERMIT SC 1
Description: Failure to prevent relief devices on Acetone Tank V-36 from lifting and releasing unauthorized emission to the atmosphere intermittently.
Notice of Intent Date: 04/12/2016 (1330728)
No DOV Associated
Notice of Intent Date: 04/11/2016 (1330770)
Disclosure Date: 04/20/2016
Viol. Classification: Major
Citation: 30 TAC Chapter 106, SubChapter K 106.262(3)
Description: Failure to submit PBR registration on time.
Disclosure Date: 10/20/2016
Viol. Classification: Major
Citation: 30 TAC Chapter 106, SubChapter K 106.262(3)
Description: Failure to submit PBR registration on time.
Notice of Intent Date: 05/10/2016 (1335337)
Disclosure Date: 11/10/2016
Viol. Classification: Minor
Citation: 40 CFR Chapter 265, SubChapter I, PT 265, SubPT I 265.174
30 TAC Chapter 335, SubChapter C 335.69(a)(1)(A)
Description: Failure to complete weekly inspections of <90 day hazardous waste container storage areas NOR: 308, 269, 273, 431, 271, 429, 274, 413, and 772.
Viol. Classification: Minor
Citation: 40 CFR Chapter 265, SubChapter I, PT 265, SubPT B 265.15(d)
40 CFR Chapter 265, SubChapter I, PT 265, SubPT I 265.174
30 TAC Chapter 335, SubChapter C 335.69(a)(1)(A)
Description: Failure to ensure that weekly inspections of the <90 day hazardous waste container storage area are properly documented with the inspector name, initials, or other required information.
Viol. Classification: Minor
Citation: 40 CFR Chapter 265, SubChapter I, PT 265, SubPT B 265.15(d)

40 CFR Chapter 265, SubChapter I, PT 265, SubPT J 265.195(a)

40 CFR Chapter 265, SubChapter I, PT 265, SubPT J 265.195(b)

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

Description: Failure to properly document <90 day tank daily inspections with the inspections time or ensure they were not modified using whiteout.

Viol. Classification: Minor

Citation: 30 TAC Chapter 115, SubChapter D 115.354(2)(C)

40 CFR Chapter 265, SubChapter I, PT 265, SubPT BB 265.1057(a)

4F TWC Chapter 63, SubChapter A 63.168(b)

40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.174(a)

Description: Failure to ensure that periodic monitoring is conducted for one valve and two connectors on a RCRA line.

Notice of Intent Date: 05/11/2016 (1336053)

Disclosure Date: 10/25/2016

Viol. Classification: Moderate

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

Rqmt Prov: PERMIT SC 15.D.

Description: Failure to maintain documentation of weekly Audible, Visual, and/or Olfactory inspections for 5 years as required.

Notice of Intent Date: 05/13/2016 (1336062)

Disclosure Date: 05/09/2017

Viol. Classification: Moderate

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

Rqmt Prov: PERMIT SC 5A

Description: Failure to maintain the minimum flow rate of 240 gph for the water flow rate to scrubber T-170 when process vents were routed to the scrubber on September 2, 2015 between 5:00-7:00 am.

Viol. Classification: Moderate

Citation: 30 TAC Chapter 115, SubChapter D 115.354(2)(C)

30 TAC Chapter 115, SubChapter D 115.356(2)

30 TAC Chapter 116, SubChapter B 116.115(c)

40 CFR Chapter 63, SubChapter C, PT 63, SubPT FFFF 63.2480(a)

Rqmt Prov: PERMIT SC 12, 28 MID

Description: Failure to monitor 53 valves, 2 relief devices, and 76 connectors and/or report or include in the percent leaker calculations.

Notice of Intent Date: 05/18/2016 (1336877)

Disclosure Date: 10/18/2016

Viol. Classification: Minor

Citation: 30 TAC Chapter 115, SubChapter H 115.725(c)(3)

30 TAC Chapter 115, SubChapter H 115.726(c)(4)

Description: Failure to include all the required information in the monitoring plan for the Salt Dome Operations.

Viol. Classification: Minor

Citation: 30 TAC Chapter 115, SubChapter H 115.725(c)(3)(C)

Description: Failure to include all calculations and process information used to calculate HRVOC emissions in the monitoring plan for pressure relief devices for the Salt Dome Operations.

Viol. Classification: Minor

Citation: 30 TAC Chapter 115, SubChapter H 115.725(a)(3)(B)

Description: Failure to include all calculations and process information used to calculate HRVOC emission in the monitoring plans for scheduled start-up, shutdown and maintenance activities at the LHC-7 Plant.

Disclosure Date: 11/29/2016

Viol. Classification: Moderate

Citation: 30 TAC Chapter 115, SubChapter H 115.726(e)(3)(A)

Description: Failure to include the vent gas streams that meet the exemption criteria of 115.727(c)(2) in the site record keeping of the sum of all vent gas streams claimed under the exemption (Power 9).

Notice of Intent Date: 05/20/2016 (1336890)

Disclosure Date: 05/24/2017

Viol. Classification: Minor

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

Rqmt Prov: PERMIT SC 21 and 28

Description: Failure to monitor and include 61 connectors in the % leaker calculation.

Viol. Classification: Minor

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

Rqmt Prov: PERMIT Special Condition 21.E.

Description: Failure to prevent one open-ended line.

Viol. Classification: Minor

Citation: 40 CFR Chapter 265, SubChapter I, PT 265, SubPT B 265.15
40 CFR Chapter 265, SubChapter I, PT 265, SubPT J 265.195
30 TAC Chapter 335, SubChapter C 335.69(a)(1)(B)

Description: Failure to conduct one daily inspection of the <90 day RCRA storage tank D-195.

Notice of Intent Date: 05/23/2016 (1336885)

No DOV Associated

Notice of Intent Date: 05/25/2016 (1336900)

Disclosure Date: 10/25/2016

Viol. Classification: Moderate

Citation: 30 TAC Chapter 122, SubChapter B 122.132(e)
40 CFR Chapter 70, SubChapter C, PT 70 70.5(c)

Description: Failure to include regulatory applicability for a chilled water drum (B27STCW) in the Title V permit for Reg V VOC and HRVOC exemptions. In addition, record of exemption documentation are not available.

Viol. Classification: Moderate

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

Description: Failure to report the emissions from B27STCQ in the annual emissions inventory.

Disclosure Date: 02/22/2017

Viol. Classification: Moderate

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

Rqmt Prov: OP SC 14

PERMIT SC 9

Description: Failure to comply with the annual throughput for B27LR1 as authorized in NSR #6803.

Notice of Intent Date: 05/26/2016 (1337935)

No DOV Associated

Notice of Intent Date: 05/31/2016 (1337950)

Disclosure Date: 10/26/2016

Viol. Classification: Moderate

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

Description: Failure to monitor as required four valves and 19 connectors and/or not reported or included in the % leaker calculations.

Viol. Classification: Moderate

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

Rqmt Prov: PERMIT SC 16, 28MID

Description: Failure to monitor as required one valve and two connectors and/or not reported or included in the % leaker calculations.

Viol. Classification: Moderate

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

Rqmt Prov: PERMIT SC 16, 28 MID

Description: Failure to monitor as required one valve and two connectors and/or not reported or included in the % leaker calculations.

Viol. Classification: Moderate

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

Rqmt Prov: PERMIT SC 16, 28 MID

Description: Failure to monitor as required one valve and two connectors and/or not reported or included in the % leaker calculations.

Viol. Classification: Major

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

Rqmt Prov: PERMIT SC 16, 28 MID

Description: Failure to monitor as required 28 valves, 63 connectors, and 1 relief device and/or not reported or included in the % leaker calculations.

Viol. Classification: Moderate

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

Rqmt Prov: PERMIT SC 16, 28 MID

Description: Failure to monitor as required one valve and three connectors and/or not reported or included in the % leaker calculations.

Viol. Classification: Moderate

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

Rqmt Prov: PERMIT SC 16, 28 MID

Description: Failure to monitor as required one connector and/or not reported or included in the % leaker calculations.

Viol. Classification: Moderate
Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
Rqmt Prov: PERMIT SC 16, 28 MID

Description: Failure to monitor one connector as required and/or not reported or included in % leaker calculations.

Notice of Intent Date: 06/02/2016 (1338712)
No DOV Associated

Notice of Intent Date: 06/02/2016 (1338720)
Disclosure Date: 10/24/2016
Viol. Classification: Minor
Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
Rqmt Prov: PERMIT SC 18

Description: Failure to monitor one insulated flange.

Viol. Classification: Moderate
Citation: 30 TAC Chapter 115, SubChapter D 115.354(2)(C)
30 TAC Chapter 115, SubChapter H 115.781(b)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT UU 63.1025
40 CFR Chapter 63, SubChapter C, PT 63, SubPT UU 63.1027
Rqmt Prov: PERMIT SC 16

Description: Failure to conduct required Method 21 monitoring on 60 components due to misclassification as an unsafe to monitor component in VOC service.

Viol. Classification: Moderate
Citation: 30 TAC Chapter 115, SubChapter D 115.352(7)
30 TAC Chapter 115, SubChapter H 115.781(b)(7)(A)
30 TAC Chapter 115, SubChapter H 115.781(b)(7)(B)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT UU 63.1022(c)(1)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT UU 63.1022(c)(2)

Description: Failure to correctly classify 60 components. Specifically, the components were classified as unsafe to monitor components in VOC service).

Viol. Classification: Moderate
Citation: 30 TAC Chapter 115, SubChapter D 115.352(4)
Rqmt Prov: OP SC 17.E.

Description: Failure to cap one open ended line in fugitive area OC6FU01.

Notice of Intent Date: 06/02/2016 (1338731)
No DOV Associated

Notice of Intent Date: 06/06/2016 (1338704)
Disclosure Date: 10/18/2016
Viol. Classification: Minor
Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)

Description: Failure to manage 350 components in gas/vapor service in accordance with the requirements of 40 CFR 60 Subpart VV and 40 CFR 63 Subpart H.

Viol. Classification: Minor
Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
Rqmt Prov: PERMIT SC 13

Description: Failure to tag leaking components discovered by OV as required by NSRP No. 28363 Special Condition 13.

Viol. Classification: Minor
Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
Rqmt Prov: PERMIT SC 13

Description: Failure to properly document the management of leaking components in heavy liquid service discovered by AVO means.

Disclosure Date: 11/10/2016
Viol. Classification: Moderate
Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)

Description: Failure to ensure that the method used to determine the DPO concentration was appropriate for the chemical DPO. Specifically, the DPO concentration could not be verified under the detector methods listed in SC 4 of NSR MSS Permit No. 83795. The permit condition that the plant used could not produce the required calibration curve and the method was not appropriate for the chemical DPO.

Disclosure Date: 12/13/2016
Viol. Classification: Moderate
Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)

Description: Failure to verify the DPO concentration under the detector methods listed in Special Condition NO. 4 of NSR

MSS Permit 83795. The permit condition method that the plant used could not produce the required calibration curve and the method was not appropriate for the chemical DPO.

Viol. Classification: Moderate

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

Rqmt Prov: PERMIT SC 15.D.(1) and 15.D.(2)

Description: Failure to ensure the DPO hourly production rate complies with the Thermal Oxidizer testing threshold specified in NSRP 28363 SC 15.D.(2) during one hour on November 7, 2015 and was not retest within 120 days as required by NSRP 28363 SC 15.D.(1).

Viol. Classification: Moderate

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

Rqmt Prov: PERMIT SC 15.D.(2) and 15.D.(3)

Description: Failure to ensure the Thermal Oxidizer testing threshold was not exceeded when the DPO hourly production rate was 7,845 lb/hr during one hour on March 7, 2016. The exceeded the Thermal Oxidizer testing threshold specified by NSRP 28363 SC 15.D.(2) which was 5,719 lb/hr at the time.

Notice of Intent Date: 06/10/2016 (1342932)

No DOV Associated

Notice of Intent Date: 06/15/2016 (1342962)

Disclosure Date: 11/16/2016

Viol. Classification: Moderate

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

Rqmt Prov: PERMIT SC 7

Description: Failure to comply with the nitrogen oxide emissions rate of 0.03 lbs/MMBTU for Furnace F-621.

Viol. Classification: Moderate

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

Rqmt Prov: PERMIT Periodic Monitoring Summary

Description: Failure to maintain records of calibration for the temperature monitoring instruments on the F-621 furnace.

Viol. Classification: Major

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

Rqmt Prov: PERMIT SC 1

OP SC 21

Description: Failure to obtain authorization in NSR Permit 46431 for emissions from a tote vent.

Viol. Classification: Minor

Citation: 30 TAC Chapter 111, SubChapter A 111.111(a)(4)(A)(ii)

Description: Failure to conduct 98% of the required daily flare observations.

Viol. Classification: Moderate

Citation: 40 CFR Chapter 63, SubChapter C, PT 63, SubPT F 63.104(c)

Description: Failure to include the information required by 40 CFR 63.104(c) in the surrogate monitoring plan for detecting leaks into the cooling water from heat exchangers.

Viol. Classification: Moderate

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

Rqmt Prov: PERMIT SC 22B

Description: Failure to ensure that NOx calibration gas cylinder are not out of range for the NOx Continuous Emissions Monitoring System for Process heat F-621.

Viol. Classification: Moderate

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

40 CFR Part 63, Subpart H 63.174

Rqmt Prov: PERMIT SC 17

Description: Failure to monitor eight connectors on the Formalin Flare header.

Viol. Classification: Moderate

Citation: 30 TAC Chapter 122, SubChapter B 122.144(1)

Description: Failure to maintain records of the weekly AVO records.

Viol. Classification: Moderate

Citation: 30 TAC Chapter 122, SubChapter B 122.142(b)(2)

Description: Failure to include the correct citation in the Title V Permit for A36MDST534 NSPS Kb applicability.

Disclosure Date: 05/09/2017

Viol. Classification: Major

Citation: 30 TAC Chapter 116, SubChapter B 116.110(a)(4)

Description: Failure to obtain authorization for new fugitive components.

Viol. Classification: Moderate

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

Rqmt Prov: PERMIT SC 9(B)

Description: Failure to have a calibration plan for the flare pilot flame thermocouples.

Viol. Classification: Moderate

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

Rqmt Prov: PERMIT SC 20(B)

Description: Failure to calibrate the T-532 and T-533 scrubber flow meters annually as required.

Notice of Intent Date: 06/20/2016 (1343625)
No DOV Associated

Notice of Intent Date: 06/27/2016 (1344696)
No DOV Associated

Notice of Intent Date: 06/28/2016 (1358359)
No DOV Associated

Notice of Intent Date: 07/06/2016 (1348831)
No DOV Associated

Notice of Intent Date: 07/11/2016 (1349376)
No DOV Associated

Notice of Intent Date: 07/13/2016 (1350825)
Disclosure Date: 10/25/2016

Viol. Classification: Moderate

Citation: 40 CFR Chapter 60, SubChapter C, PT 60, SubPT VV 60.482-1(f)(1)
40 CFR Part 60, Subpart VV 60.482-2

Description: Failure to conduct weekly AVO inspections for many of the pumps subject to NSPS VV. Specifically, a discrepancy was found between the number of pumps in the fugitive monitoring database (73) and the number of pumps on the weekly audible, visual, olfactory inspection checklist (23).

Viol. Classification: Moderate

Citation: 40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.172(f)(1)(ii)

Description: Failure to conduct annual visual inspections of the closed vent system for 2014, as required by NSPS VV.

Viol. Classification: Moderate

Citation: 40 CFR Chapter 63, SubChapter C, PT 63, SubPT SS 63.983(a)(3)

Description: Failure to ensure that the valves on the closed vent systems (which can diver the vent stream from the control device to the atmosphere) have a car seal and as inspected on a monthly basis for NSPS DDD or HON.

Notice of Intent Date: 07/12/2016 (1350828)
Disclosure Date: 01/05/2017

Viol. Classification: Moderate

Citation: 30 TAC Chapter 116, SubChapter B 116.115(b)(2)(F)
30 TAC Chapter 116, SubChapter G 116.715(c)(8)

Description: Failure to ensure that the B7600 (B76POLR1) loading rack has an overall VOC emissions control efficiency of 100%, as represented in the permit application.

Notice of Intent Date: 07/14/2016 (1350830)
Disclosure Date: 10/27/2016

Viol. Classification: Moderate

Citation: 30 TAC Chapter 115, SubChapter H 115.725(c)
30 TAC Chapter 115, SubChapter H 115.725(d)
40 CFR Chapter 70, SubChapter C, PT 70 70.5(c)

Description: Failure to include referenced to applicable requirements and exemptions in 30 TAC 115 Subchapter H Division 1 in Title V Permit O2219.

Viol. Classification: Moderate

Citation: 30 TAC Chapter 115, SubChapter H 115.766(c)
40 CFR Chapter 70, SubChapter C, PT 70 70.5(c)

Description: Failure to include referenced in Title V Permit O2219 to applicable exemptions in 30 TAC 115 Subchapter H Division 2: cooling Tower heat Exchange Systems and the corresponding exemption recordkeeping requirements in 115.776(b) and (c).

Viol. Classification: Moderate

Citation: 40 CFR Chapter 60, SubChapter C, PT 60, SubPT DDD 60.560(a)(4)(i)
40 CFR Chapter 60, SubChapter C, PT 60, SubPT DDD 60.562-2
40 CFR Chapter 70, SubChapter C, PT 70 70.5(c)

Description: Failure to submit semiannual NSPS VV reports for the B3814 area.

Viol. Classification: Moderate

Citation: 40 CFR Chapter 60, SubChapter C, PT 60, SubPT DDD 60.560(a)(4)(i)
40 CFR Chapter 60, SubChapter C, PT 60, SubPT DDD 60.562-2

Description: Failure to include the correct documentation of exemptions for NSPS VV and NSPS DDD in Title V Permit O2219, regulatory reports, initial notification, and exemption recordkeeping for the B3826 Polyolefins Pilot Plant, the B3826FU01, B3815FU1 and B3831FU1 fugitive areas.

Viol. Classification: Moderate

Citation: 40 CFR Chapter 70, SubChapter C, PT 70.70.5(c)

Description: Failure to correctly list in the Title V Permit O2219 the permit shield for storage tanks B3808ST801 and B3826T802 relative to NSPS DDD. The storage tanks are listed as being part of the affected facility in the NSPS DDD semiannual report submitted for the B-3826 area.

Viol. Classification: Moderate

Citation: 30 TAC Chapter 115, SubChapter H 115.727(c)(2)

40 CFR Chapter 70, SubChapter C, PT 70.70.5(c)

Description: Failure to correctly list and/or represent several HRVOC vents in the Title V Permit O2219 and/or in the small source exemption documentation.

Viol. Classification: Moderate

Citation: 30 TAC Chapter 115, SubChapter B 115.111(a)(1)

30 TAC Chapter 115, SubChapter B 115.118(a)(1)

Description: Failure to correctly identify the true vapor pressure for B3831 Storage Tank D-102 (B3831ST102) for 30 TAC 115 Storage of VOCs in Title V Permit O2219.

Viol. Classification: Moderate

Citation: 30 TAC Chapter 115, SubChapter H 115.725(c)(3)

30 TAC Chapter 115, SubChapter H 115.726(c)(4)

Description: Failure to properly maintain the monitoring plans for affected pressure relief valves at the B-3800 and B-4010 Polyolefins R&D areas.

Viol. Classification: Moderate

Citation: 40 CFR Chapter 60, SubChapter C, PT 60, SubPT VV 60.482-2(a)(2)

Description: Failure to maintain complete record of pump weekly visual inspections.

Viol. Classification: Moderate

Citation: 40 CFR Chapter 60, SubChapter C, PT 60, SubPT VV 60.487(c)(2)(ii)

40 CFR Chapter 60, SubChapter C, PT 60, SubPT VV 60.487(c)(2)(iv)

40 CFR Chapter 60, SubChapter C, PT 60, SubPT VV 60.487(c)(2)(vi)

Description: Failure to include in semi-annual NSPS VV reports the number of valves, pumps, and compressors not repaired within the 5/15 day time limits as required by the NSPS VV.

Notice of Intent Date: 07/25/2016 (1351376)

No DOV Associated

Notice of Intent Date: 08/09/2016 (1356231)

No DOV Associated

Notice of Intent Date: 08/11/2016 (1357150)

Disclosure Date: 11/08/2016

Viol. Classification: Moderate

Citation: 30 TAC Chapter 116, SubChapter B 116.111(a)(2)(G)

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

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

Description: Failure to maintain record of the water flow rate of the scrubber demonstrating that the removal efficiency is as represented in the permit application and no routine maintenance is being performed.

Viol. Classification: Moderate

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

Rqmt Prov: PERMIT SC 8.E.

Description: Failure to prevent open ended lines at the rail car wash station due to equipment configuration.

Viol. Classification: Moderate

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

Rqmt Prov: PERMIT SC 8.A.

Description: Failure to clearly identify and document equipment excluded from fugitive monitoring applicability.

Notice of Intent Date: 08/12/2016 (1357157)

Disclosure Date: 11/08/2016

Viol. Classification: Moderate

Citation: 30 TAC Chapter 116, SubChapter B 116.110(a)

30 TAC Chapter 335, SubChapter C 335.69

Rqmt Prov: OP Title V O2217

Description: Failure to prevent the storage of waste contained in a location that does not meet the RCRA requirements for 90-day area. In addition, the waste handling activities have not been evaluated for air permitting requirements.

Viol. Classification: Moderate

Citation: 30 TAC Chapter 116, SubChapter B 116.116(a)(1)
 Rqmt Prov: PERMIT SC 7
 OP ST&C 15
 Description: Failure to comply with the hourly flow rate representation for tank 6003 in NSRP 19720
 Viol. Classification: Moderate
 Citation: 30 TAC Chapter 116, SubChapter B 116.116(a)(1)
 Rqmt Prov: PERMIT SC 2
 OP ST&C 15
 Description: Failure to comply with the 12-month throughput representations in NSR 22070 for Tanks 4043 and 10002.
 Viol. Classification: Moderate
 Citation: 30 TAC Chapter 116, SubChapter B 116.116(a)(1)
 Rqmt Prov: PERMIT SC 7
 OP ST&C 15
 Description: Failure to comply with the 12-month throughput representation in NSR 19792 in Tank 7001.
 Viol. Classification: Minor
 Citation: 30 TAC Chapter 111, SubChapter A 111.111(a)(4)
 Rqmt Prov: OP ST&C 3
 Description: Failure to ensure that daily observations of flares for visible emissions are conducted and documented at the correct time of day for visible emissions observations of emission units. On occasion daily observations were documented at an incorrect time of day.
 Disclosure Date: 11/11/2016
 Viol. Classification: Major
 Citation: 30 TAC Chapter 116, SubChapter B 116.116(a)(1)
 Description: Failure to ensure that the Octene Regeneration System is properly authorized.
 Disclosure Date: 05/10/2017
 Viol. Classification: Moderate
 Citation: 30 TAC Chapter 116, SubChapter B 116.116(a)(1)
 Rqmt Prov: PERMIT Representations
 OP SC 16
 Description: Failure to comply with the hourly flow rate representation in PBR 11745 for containerized tank truck loading of acetone.
 Viol. Classification: Moderate
 Citation: 30 TAC Chapter 116, SubChapter B 116.116(a)(1)
 Rqmt Prov: PERMIT Representations
 OP ST&C 15
 Description: Failure to comply with the hours representations for fuel gas in NSRP 18950 for the Barge Flare FS-900 and Ship Flare FS-901.
 Viol. Classification: Moderate
 Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
 Rqmt Prov: PERMIT SC 10
 OP ST&C 15
 Description: Failure to maintain records of waste gas purged from naphtha/condensate barge and ship unloading on a 12-month rolling period to demonstrate compliance with permit representations.
 Viol. Classification: Moderate
 Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
 Rqmt Prov: PERMIT SC3
 OP ST&C 15
 Description: Failure to maintain calibration records for the flare thermocouples (EPN A35F1 and A35F900).
 Viol. Classification: Moderate
 Citation: 30 TAC Chapter 106, SubChapter A 106.8
 30 TAC Chapter 117, SubChapter B 117.345(f)(6)(B)
 40 CFR Chapter 63, SubChapter C, PT 63, SubPT ZZZZ 63.6655(f)
 Rqmt Prov: PERMIT SC 12
 OP ST&C 15 and 17
 Description: Failure to maintain records of engine usage for emergency diesel fire pump on a 12 month rolling average basis.
 Viol. Classification: Moderate
 Citation: 30 TAC Chapter 116, SubChapter B 116.116(a)(1)
 Rqmt Prov: PERMIT Representations
 OP ST&C 15
 Description: Failure to ensure that ship loading of propylene oxide is pressurized, as represented in NSR 19792.
 Viol. Classification: Moderate
 Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)

Rqmt Prov: PERMIT SC 9
 OP ST&C 15

Description: Failure to maintain continuous data for the waste gas flow and fuel flow to tow flares (EPN A35F1 and A35F900) due to a computer system outage.

Viol. Classification: Moderate
 Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
 Rqmt Prov: PERMIT SC 9
 OP ST&C 15

Description: Failure to comply with the maximum exit velocity for the Barge Flare FS-900 and the Ship Flare FS-907 per 40 CFR 60.18.

Viol. Classification: Moderate
 Citation: 30 TAC Chapter 116, SubChapter B 116.116(a)(1)
 Rqmt Prov: PERMIT SC7
 OP ST&C 15

Description: Failure to comply with the hourly representations for the fuel gas flow rate to the 7001 flare.

Disclosure Date: 11/10/2017
 Viol. Classification: Moderate
 Citation: 30 TAC Chapter 116, SubChapter B 116.116(a)(1)
 Rqmt Prov: PERMIT SC1
 OP ST&C No. 15

Description: Failure to comply with fugitive emissions components count representations for A30FU5.

Viol. Classification: Moderate
 Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
 Rqmt Prov: OP NSR 6932

Description: Failure to complete AVO inspections for one area in the A-40 pipeline corridor.

Viol. Classification: Moderate
 Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)

Description: Failure to obtain authorization for emissions from the octane tank knock-out pot to Flare FS-1.

Viol. Classification: Moderate
 Citation: 30 TAC Chapter 101, SubChapter A 101.10
 30 TAC Chapter 115, SubChapter H 115.725(d)(2)
 Rqmt Prov: OP ST&C 2.E.

Description: Failure to prevent a discrepancy between methane flow monitoring and online analyzer for the Flare FS-1, resulting in inconsistent total CO and NOx emissions.

Notice of Intent Date: 08/29/2016 (1362527)
 Disclosure Date: 05/09/2017
 Viol. Classification: Moderate
 Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
 40 CFR Part 63, Subpart H 63.174
 Rqmt Prov: OP SC 18
 PERMIT SC 28

Description: Failure to monitor seven connectors for fugitive emissions.

Notice of Intent Date: 09/09/2016 (1363607)
 Disclosure Date: 10/21/2016
 Viol. Classification: Moderate
 Citation: 30 TAC Chapter 116, SubChapter B 116.111(a)(2)(G)
 Rqmt Prov: PERMIT Permit 46428

Description: Failure to ensure that B34 FTO is operating within the permit representation of 2 ppmv concentration of NOx at the stack. There were no emissions about the permit limit during this time.

Notice of Intent Date: 09/08/2016 (1363609)
 Disclosure Date: 09/11/2017
 Viol. Classification: Moderate
 Citation: 30 TAC Chapter 111, SubChapter A 111.111(a)(1)(B)
 30 TAC Chapter 111, SubChapter A 111.111(a)(1)(F)

Description: Failure to complete visible emission inspections for B255 TOX Vent (EPN: B255TODCR).

Viol. Classification: Moderate
 Citation: 30 TAC Chapter 115, SubChapter H 115.726(e)(3)(A)
 30 TAC Chapter 115, SubChapter H 115.727(c)(2)

Description: Failure to include B255TODCR in the site's HRVOC vent small source cap exemption documentation.

Viol. Classification: Moderate
 Citation: 40 CFR Chapter 70, SubChapter C, PT 70 70.5(c)

Description: Failure to include references to applicable requirements and exemptions in 30 TAC 115 in Title V permit 02219.

Notice of Intent Date: 09/14/2016 (1364464)
No DOV Associated

Notice of Intent Date: 09/20/2016 (1364478)
No DOV Associated

Notice of Intent Date: 09/26/2016 (1364949)
Disclosure Date: 05/15/2017
Viol. Classification: Moderate
Citation: 30 TAC Chapter 305, SubChapter F 305.125(1)
Rqmt Prov: PERMIT Condition V.H.3.c.

Description: Failure to comply with the RCRA permit emission rate limits due to a 2010 Comprehensive Performance Test established feed rate for LVM under HWS MACT.

Disclosure Date: 10/23/2017
Viol. Classification: Moderate
Citation: 30 TAC Chapter 117, SubChapter G 117.8100(a)

Description: Failure to ensure sufficient monitoring data occurs when concentrations to the CEMS analyzer were outside of the span of the CEMS.

Viol. Classification: Moderate
Citation: 30 TAC Chapter 305, SubChapter F 305.125(1)
Rqmt Prov: PERMIT Condition V.H.3.c and Table V.H.4

Description: Failure to comply with the chromium emission rate during in plant testing.

Notice of Intent Date: 10/24/2016 (1371549)
Disclosure Date: 04/25/2017
Viol. Classification: Moderate
Citation: 40 CFR Chapter 61, SubChapter C, PT 61, SubPT FF 61.343(a)

Description: Failure to route all of the organic vapors from a Benzene Waste Organic NESHAP storage tank to the control device. This resulted in intermittent unauthorized emissions from the safety valve.

Notice of Intent Date: 11/03/2016 (1376300)
No DOV Associated

Notice of Intent Date: 11/08/2016 (1377145)
No DOV Associated

Notice of Intent Date: 11/14/2016 (1377159)
Disclosure Date: 08/16/2017
Viol. Classification: Moderate
Citation: 40 CFR Chapter 63, SubChapter C, PT 63, SubPT FFFF 63.2450(a)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT FFFF 63.2450(c)(2)(i)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT FFFF 63.2455(b)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT FFFF 63.2455(b)(1)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT FFFF 63.2460(b)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT FFFF 63.2460(b)(5)(ii)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT FFFF 63.2520(d)(2)(i)

Description: Failure to ensure group determinations on the batch process vents from reactors R-526 and R-527 and the continuous process vents from reactors R-528 A/B/C/D are performed and included with the Subpart FFFF Notification of Compliance Status submitted on October 7, 2008, and the supplemental NOCS reports submitted on February 28, 2009 and February 27, 2017.

Viol. Classification: Moderate
Citation: 40 CFR Chapter 63, SubChapter C, PT 63, SubPT FFFF 63.2450(a)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT FFFF 63.2450(k)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT FFFF 63.2460(b)(5)(ii)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT FFFF 63.2515(c)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT FFFF 63.2520(d)(2)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT FFFF 63.2520(e)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT SS 63.990

Description: Failure to ensure that the reactor vents from the batch and continuous reactors are classified as Group 1 batch process vents, and ensure that the T-509 ammonia absorber and T-510 scrubber system comply with the control system requirements in the MON and Subpart SS requirements.

Viol. Classification: Moderate

Citation: 40 CFR Chapter 63, SubChapter C, PT 63, SubPT FFFF 63.2520(e)(4)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT FFFF 63.2520(e)(5)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT A 63.6(e)(3)(i)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT SS 63.996
40 CFR Chapter 63, SubChapter C, PT 63, SubPT SS 63.998(c)(1)(ii)(C)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT SS 63.998(c)(1)(ii)(D)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT SS 63.998(c)(1)(ii)(E)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT SS 63.998(c)(1)(ii)(F)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT SS 63.998(c)(1)(ii)(G)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT SS 63.998(d)(3)

Description: Failure to ensure that the reactor vents from the batch and continuous reactors are classified as Group 1 batch process vents and ensure the T-509 ammonia absorber and T-510 scrubber system and associated monitoring system comply with the Start-up Shutdown, and Malfunction Plan requirements.

Viol. Classification: Moderate

Citation: 40 CFR Chapter 63, SubChapter C, PT 63, SubPT GGG 63.1257(d)(2)(i)(C)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT FFFF 63.2460(c)(2)(v)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT FFFF 63.2520(d)(2)(ii)

Description: Failure to ensure that the initial demonstration for process condensers E-529 and E-530 are conducted or submitted with the Subpart FFFF Notification of Compliance Status.

Viol. Classification: Moderate

Citation: 4F TWC Chapter 63, SubChapter A 63.101
40 CFR Chapter 63, SubChapter C, PT 63, SubPT F 63.104(a)(5)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT G 63.132(c)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT G 63.146(b)(1)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT FFFF 63.2450(r)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT FFFF 63.2485(a)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT FFFF 63.2485(b)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT FFFF 63.2485(c)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT FFFF 63.2520(d)(2)(i)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT FFFF 63.2520(d)(2)(ii)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT FFFF 63.2520(d)(2)(iii)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT FFFF 63.2520(d)(2)(iv)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT FFFF 63.2520(d)(2)(v)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT FFFF 63.2550

Description: Failure to ensure that the Subpart FFFF Notification of Compliance Status submitted on October 7, 2008 and subsequent supplemental NOCS reports submitted on February 28, 2009 and February 27, 2017 are accurate.

Viol. Classification: Moderate

Citation: 40 CFR Chapter 63, SubChapter C, PT 63, SubPT SS 63.983(b)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT SS 63.998(d)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT SS 63.999(c)(2)

Description: Failure to ensure that the reactor vents from the batch and continuous reactors are classified as Group 1 batch process vents, and ensure that the closed vent systems associated with the T-509 ammonia absorber and T-510 scrubber system are initially monitored or inspected annual by audio, visual, and/or olfactory means. In addition, failure to ensure that records of the closed vent system inspections are kept and results of the inspections are reported in the semiannual MON compliance report.

Notice of Intent Date: 11/18/2016 (1381591)

Disclosure Date: 12/08/2016

Viol. Classification: Moderate

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

Rqmt Prov: PERMIT SC 1

Description: Failure to prevent unauthorized emissions to the atmosphere during intermittent times of relieving excess nitrogen and residual oxide pressure from process reactor vents.

Notice of Intent Date: 11/30/2016 (1382176)

Disclosure Date: 12/13/2016

Viol. Classification: Moderate

Citation: 30 TAC Chapter 115, SubChapter D 115.356(2)
30 TAC Chapter 116, SubChapter B 116.115(c)
40 CFR Chapter 60, SubChapter C, PT 60, SubPT VV 60.486(e)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.162(c)

Rqmt Prov: PERMIT SC 6

Description: Failure to tag and monitor and manage 140 fugitive components in light liquid service. They were missing tags and are not in the LDAR monitoring system and have not been managed in accordance with the applicable regulatory requirements.

Viol. Classification: Major

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

Description: Failure to permit two rental diesel-driven air compressors brought onsite for temporary service which were used for backup/supplemental purposed at Unit 3. The two compressors were used for over 12 months without permitting.

Disclosure Date: 06/12/2017

Viol. Classification: Moderate

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

Rqmt Prov: PERMIT SC 6

Description: Failure to include 10 connectors and 4 valves in VOC light liquid service in the fugitive monitoring system and manage in accordance with applicable requirements.

Notice of Intent Date: 12/05/2016 (1382167)

Disclosure Date: 04/24/2017

Viol. Classification: Moderate

Citation: 30 TAC Chapter 111, SubChapter A 111.111(a)(1)

Rqmt Prov: PERMIT SC 4

OP ST&C 3.A.

Description: Failure to prevent an opacity event a the B824 Thermal Oxidizer while burning waste on December 12, 2016.

Disclosure Date: 08/10/2017

Viol. Classification: Moderate

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

Rqmt Prov: PERMIT SC 26D

Description: Failure to ensure that the record keeping for new chemical authorized under NSRP 313 SC26 contains all the required information.

Notice of Intent Date: 12/16/2016 (1383132)

No DOV Associated

Notice of Intent Date: 01/05/2017 (1388413)

Disclosure Date: 05/04/2017

Viol. Classification: Moderate

Citation: 40 CFR Chapter 63, SubChapter C, PT 63, SubPT JJJ 63.1328

Description: Failure to comply with the heat exchange system provisions under the Polymer and Resins IV MACT (Subpart JJJ).

Viol. Classification: Moderate

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

Rqmt Prov: PERMIT SC 19

Description: Failure to pressure test methylene chloride tank trucks prior to loading methylene chloride and maintain records.

Viol. Classification: Moderate

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

Rqmt Prov: PERMIT SC 21D

Description: Failure to maintain records of the carbon adsorption system as required.

Viol. Classification: Moderate

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

Rqmt Prov: PERMIT SC 14E

Description: Failure to prevent two open ended lines.

Viol. Classification: Moderate

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

Rqmt Prov: PERMIT SC 12B

Description: Failure to prevent intermittent times when the quarterly CGAs for the TOX/THROX were not within +/- 15% accuracy.

Viol. Classification: Moderate

Citation: 40 CFR Chapter 63, SubChapter C, PT 63, SubPT JJJ 63.1331(a)(9)(iii)

Description: Failure to ensure that a pressure relief device on a inhibitor tote in OHAP service meets the pressure release management requirements.

Viol. Classification: Moderate

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

Rqmt Prov: PERMIT SC 11

Description: Failure to comply with the 12 month rolling throughput limit for one tank (B44ST540).

Viol. Classification: Moderate

Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
Rqmt Prov: PERMIT 24C
Description: Failure to ensure that a LEL meter used for a MSS activity meets calibration, functionality, and recordkeeping requirements.
Disclosure Date: 05/09/2017
Viol. Classification: Moderate
Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
Rqmt Prov: PERMIT SC 23D(2)
Description: Failure to comply with Attachment C (NSRP No. 46429) record keeping requirements.
Disclosure Date: 01/08/2018
Viol. Classification: Moderate
Citation: 40 CFR Chapter 63, SubChapter C, PT 63, SubPT JJJ 63.1328
Description: Failure to comply with the heat exchange system provisions under the Polymer and Resins IV MACT (Subpart JJJ).
Viol. Classification: Moderate
Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
Rqmt Prov: PERMIT SC 19
Description: Failure to pressure test methylene chloride tank trucks prior to loading methylene chloride and maintain records.
Viol. Classification: Moderate
Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
Rqmt Prov: PERMIT SC 21D
Description: Failure to maintain records of the carbon adsorption system as required.
Viol. Classification: Moderate
Citation: 40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.167(a)(1)
Rqmt Prov: PERMIT SC 14E
Description: Failure to prevent two open ended lines.
Viol. Classification: Moderate
Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
Rqmt Prov: PERMIT SC 12B
Description: Failure to prevent intermittent times when the quarterly CGAs for the TOX/THROX were not within +/- 15% accuracy.
Viol. Classification: Moderate
Citation: 40 CFR Chapter 63, SubChapter C, PT 63, SubPT JJJ 63.1331(a)(9)(iii)
Description: Failure to ensure that a pressure relief device on a inhibitor tote in OHAP service meets the pressure release management requirements.
Viol. Classification: Moderate
Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
Rqmt Prov: PERMIT SC 11
Description: Failure to comply with the 12 month rolling throughput limit for one tank (B44ST540).
Viol. Classification: Moderate
Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
Rqmt Prov: PERMIT 24C
Description: Failure to ensure that a LEL meter used for a MSS activity meets calibration, functionality, and recordkeeping requirements.
Viol. Classification: Moderate
Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
Rqmt Prov: PERMIT SC 23D(2)
Description: Failure to comply with Attachment C (NSRP No. 46429) record keeping requirements.
Notice of Intent Date: 01/09/2017 (1389710)
No DOV Associated
Notice of Intent Date: 01/31/2017 (1395074)
Disclosure Date: 08/14/2017
Viol. Classification: Moderate
Citation: 30 TAC Chapter 122, SubChapter B 122.143(4)
Rqmt Prov: OP SC 14
Description: Failure to incorporate LaboCombi B-1607 PBR into the Title V Permit O2219.
Notice of Intent Date: 02/01/2017 (1395529)
Disclosure Date: 05/16/2017
Viol. Classification: Moderate
Citation: 40 CFR Chapter 63, SubChapter C, PT 63, SubPT G 63.118(a)(4)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT G 63.118(f)(4)

Description: Failure to report in the November 2016 POPG HON Subpart semiannual report that the car-seal mechanism was changed out as a precaution due to the condition of the seal.

Viol. Classification: Minor

Citation: 30 TAC Chapter 115, SubChapter H 115.725(c)(3)(D)
30 TAC Chapter 115, SubChapter H 115.726(i)

Rqmt Prov: OP Dated 12/13/2010

Description: Failure to maintain the quarterly inspection documentation of pressure relief valves in HRVOC service for the 1st, 2nd, and 3rd quarters of 2012.

Viol. Classification: Minor

Citation: 40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.163(b)(3)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.163(e)(4)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.181(c)

Description: Failure to complete weekly visual inspections on 5 single seal pumps in light liquid service.

Viol. Classification: Minor

Citation: 30 TAC Chapter 115, SubChapter D 115.352(1)(B)
30 TAC Chapter 115, SubChapter D 115.352(2)
30 TAC Chapter 115, SubChapter D 115.356(2)(E)
4F TWC Chapter 63, SubChapter A 63.163(b)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.182(d)(2)(iii)

Rqmt Prov: PERMIT SC 15.H.I.J.
OP STC 20

Description: Failure to report in the HON Subpart H Periodic Report submitted on May 19, 2016 that repair verification did not occur on two pumps in light liquid service that were found leaking during the weekly visual inspection at the B-1300 Crude PO Plant.

Viol. Classification: Moderate

Citation: 40 CFR Chapter 63, SubChapter C, PT 63, SubPT EEEE 63.2346(a)(4)

Description: Failure to maintain documentation for the reloading/cleaning facilities certifying that the reloading/cleaning facility meets the closed vent system and control device requirements or vapor balancing requirements in the Organic Liquids Distribution MACT, 40 CFR 63 Subpart EEE. The storage tanks at the EO Distribution area use the vapor balancing option provided in Subpart EEEE.

Viol. Classification: Moderate

Citation: 30 TAC Chapter 115, SubChapter H 115.726(e)(2)
30 TAC Chapter 115, SubChapter H 115.726(e)(3)(A)

Description: Failure to maintain or keep up to date the exemption documentation required under HRVOC Vent Gas Control rule for demonstrating continuous compliance for vents complying with the exemption for vent gas streams resulting from the combustion of less than 5.0% by weight HRVOC in boilers, furnaces, engines, turbines, incinerators, and heater.

Disclosure Date: 09/25/2017

Viol. Classification: Moderate

Citation: 30 TAC Chapter 115, SubChapter D 115.354(1)
30 TAC Chapter 115, SubChapter D 115.354(2)
40 CFR Part 63, Subpart H 63.168
40 CFR Part 63, Subpart H 63.174

Rqmt Prov: PERMIT SC 15

Description: Failure to include twenty five vales and one hundred twenty connectors in VOC light liquid or gas/vapor service were not included in the fugitive monitoring program and were not being periodically monitored as required.

Notice of Intent Date: 02/17/2017 (1400401)

Disclosure Date: 04/21/2017

Viol. Classification: Major

Citation: 30 TAC Chapter 116, SubChapter B 116.110(a)(1)
30 TAC Chapter 116, SubChapter B 116.110(a)(4)

Description: Failure to obtain authorization for a tank that has been operating.

Disclosure Date: 10/23/2017

Viol. Classification: Moderate

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

Rqmt Prov: PERMIT SC 1
OP ST&Cs

Description: Failure to comply with the hourly and annual throughputs/emissions for EPNs B27ST16A, B27ST16B, and B27ST31.

Viol. Classification: Moderate

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

Rqmt Prov: PERMIT SC 17

Description: Failure to ensure that compliance calculations for NSR 6803, SC 17 are averaged across all four trains to

demonstrate compliance with SC 2. When corrected it was discovered that the average weekly sampling exceeded the VOC short-term emission limits as written I SC 2 the week of September 26, 2017.

Viol. Classification: Moderate

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

Rqmt Prov: PERMIT SC 1
OP SC 14

Description: Failure to comply with the hourly allowable emissions from the pellet handling system on the following days: August 24 through 25, 2016, September 20 thru 22, 2016, May 16, 2017 and September 26, 2017.

Viol. Classification: Moderate

Citation: 30 TAC Chapter 106, SubChapter K 106.261(a)(7)(A)
30 TAC Chapter 116, SubChapter B 116.110(a)(1)
30 TAC Chapter 116, SubChapter B 116.110(a)(4)

Description: Failure to submit a PBR and obtain authorization prior to project installation.

Notice of Intent Date: 03/06/2017 (1401051)
No DOV Associated

Notice of Intent Date: 03/10/2017 (1401891)
No DOV Associated

Notice of Intent Date: 03/10/2017 (1401903)
Disclosure Date: 05/08/2017

Viol. Classification: Moderate

Citation: 30 TAC Chapter 335, SubChapter A 335.6

Description: Failure to accurately reflect a sump on the NOR. Specifically, a sump was closed on the NOR in error.

Viol. Classification: Moderate

Citation: 40 CFR Chapter 265, SubChapter I, PT 265, SubPT I 265.174
30 TAC Chapter 335, SubChapter C 335.69(a)(1)(A)

Description: Failure to conduct inspections weekly of the <90 days hazardous waste container storage area for NOR No. 298, 283, and 263.

Viol. Classification: Moderate

Citation: 40 CFR Chapter 61, SubChapter C, PT 61, SubPT FF 61.345(a)(1)(i)

Description: Failure to conduct initial Method 21 monitoring on a container applicable to Benzene Waste NESHAFF regulation.

Viol. Classification: Moderate

Citation: 40 CFR Chapter 265, SubChapter I, PT 265, SubPT I 265.174
30 TAC Chapter 335, SubChapter C 335.69(a)(1)(A)

Description: Failure to ensure complete inspections of the <90 day hazardous waste container storage area (NOR 398). Specifically, inspection paperwork was not specific to the area inspected, resulting in incomplete inspections.

Disclosure Date: 06/08/2017

Viol. Classification: Minor

Citation: 40 CFR Chapter 265, SubChapter I, PT 265, SubPT B 265.15(d)
40 CFR Chapter 265, SubChapter I, PT 265, SubPT I 265.174
30 TAC Chapter 335, SubChapter C 335.69(a)(1)(A)

Description: Failure to record the time on the inspection on weekly inspection of the <90 day hazardous waste container storage area.

Viol. Classification: Minor

Citation: 40 CFR Chapter 265, SubChapter I, PT 265, SubPT B 265.15(d)
40 CFR Chapter 265, SubChapter I, PT 265, SubPT I 265.174
30 TAC Chapter 335, SubChapter C 335.69(a)(1)(A)

Description: Failure to maintain a record of weekly inspection of the <90 day hazardous waste container storage area (NOR # 269, 273, 431, 271, 429, 274, 413, and 243).

Viol. Classification: Moderate

Citation: 30 TAC Chapter 335, SubChapter A 335.10

Description: Failure to maintain Department of Transportation shipping papers for three years from the date of delivery for waste shipped to the Texas Operations.

Disclosure Date: 07/11/2017

Viol. Classification: Moderate

Citation: 40 CFR Chapter 267, SubChapter I, PT 267, SubPT B 267.16(c)

Description: Failure to maintain annual training records for all personnel managing waste in the maintenance areas.

Notice of Intent Date: 03/21/2017 (1403174)
No DOV Associated

Notice of Intent Date: 03/23/2017 (1403642)
No DOV Associated

Notice of Intent Date: 03/24/2017 (1403647)
Disclosure Date: 05/02/2017

Viol. Classification: Minor

Citation: 30 TAC Chapter 115, SubChapter D 115.354(11)
30 TAC Chapter 115, SubChapter D 115.354(2)(C)

Description: Failure to periodically monitor 75 components as required.

Disclosure Date: 10/23/2017

Viol. Classification: Moderate

Citation: 30 TAC Chapter 115, SubChapter D 115.354
30 TAC Chapter 115, SubChapter D 115.354(11)
30 TAC Chapter 115, SubChapter H 115.781
40 CFR Part 61, Subpart V 61.242-7
40 CFR Part 61, Subpart V 61.242-8

Description: Failure to periodically monitor 128 components as required under 28 VHP, Reg V, and/or EPAV. Also 39 components were not periodically monitored as required under HRVOC.

Viol. Classification: Moderate

Citation: 30 TAC Chapter 115, SubChapter D 115.354(1)(A)
30 TAC Chapter 115, SubChapter D 115.356(3)(C)
30 TAC Chapter 115, SubChapter D 115.357(1)

Description: Failure to conduct AVO inspections of 24 components as required under Reg V.

Notice of Intent Date: 03/24/2017 (1403654)
Disclosure Date: 10/24/2017

Viol. Classification: Moderate

Citation: 30 TAC Chapter 116, SubChapter B 116.110(a)(1)
30 TAC Chapter 116, SubChapter B 116.110(a)(4)

Description: Failure to authorize three process vents on the PDS Mix Tanks.

Viol. Classification: Moderate

Citation: 40 CFR Chapter 63, SubChapter C, PT 63, SubPT SS 63.983(a)(3)(i)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT SS 63.998(d)(1)(ii)(A)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT SS 63.999(c)(2)(ii)

Description: Failure to measure the diversion of closed vent system bypass flow on the gray air to the F-5510 furnace for MON (due to incorrect flow meter design and installation).

Viol. Classification: Moderate

Citation: 30 TAC Chapter 115, SubChapter D 115.354(11)

Description: Failure to conduct fugitive monitoring on eight valves and 90 connectors designated as difficult to monitor fugitive components.

Viol. Classification: Moderate

Citation: 30 TAC Chapter 115, SubChapter D 115.354(11)

Description: Failure to monitor 114 connectors and 20 valves equipped with nitrogen bands to prevent oxygen inclusion into the process system via Method 21 monitoring.

Notice of Intent Date: 03/29/2017 (1408173)
Disclosure Date: 04/24/2017

Viol. Classification: Minor

Citation: 30 TAC Chapter 115, SubChapter D 115.354(3)
30 TAC Chapter 116, SubChapter B 116.115(c)

Rqmt Prov: PERMIT SC No. 11.F.
OP SC No. 14

Description: Failure to include four flanges in Acrylic Acid/Isopar service in the fugitive monitoring program.

Notice of Intent Date: 04/05/2017 (1408297)
Disclosure Date: 04/27/2017

Viol. Classification: Minor

Citation: 30 TAC Chapter 122, SubChapter B 122.143(4)
Rqmt Prov: OP SC 3A(iv)(1) and A(3)

Description: Failure to maintain records of quarterly visible emission observation for the Emergency Diesel Engine for the first quarter of 2017 and the fourth quarter of 2016. In addition, a quarterly visible emission observation was not performed in the fourth quarter of 2016 for Furnace 8 and Furnace 9.

Viol. Classification: Minor
Citation: 30 TAC Chapter 115, SubChapter D 115.354(2)(C)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT UU 63.1025(b)(1)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT UU 63.1025(b)(2)
Rqmt Prov: PERMIT SC No. 16.F.

Description: Failure to include two valves in the fugitive monitoring program.
Viol. Classification: Minor
Citation: 30 TAC Chapter 115, SubChapter D 115.352(4)
30 TAC Chapter 115, SubChapter H 115.783(5)
40 CFR Chapter 61, SubChapter C, PT 61, SubPT FF 61.349(g)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT UU 63.1033(b)(1)
Rqmt Prov: PERMIT SC 16.E.

Description: Failure to prevent one open ended line in fugitive service.
Viol. Classification: Moderate
Citation: 30 TAC Chapter 115, SubChapter E 115.412(1)(C)
30 TAC Chapter 115, SubChapter E 115.412(1)(F)
Rqmt Prov: OP ST&C

Description: Failure to attached a permanent label to the cold solvent cleaner summarizing the operating requirements.
Disclosure Date: 05/02/2017
Viol. Classification: Moderate
Citation: 40 CFR Chapter 63, SubChapter C, PT 63, SubPT SS 63.982(a)(1)
Rqmt Prov: PERMIT SC 1

Description: Failure to route all of the organic vapors from a Fixed Roof Fuel Oil Storage tank to a control device. This resulted in intermittent unauthorized emission from the Pressure Vacuum Relief Valve.
Viol. Classification: Moderate
Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
Rqmt Prov: PERMIT SC No. 1

Description: Failure to prevent a permit exceedance of the Flare source CAP, as discovered during a review of calculation methodology.
Viol. Classification: Moderate
Citation: 30 TAC Chapter 117, SubChapter B 117.310(c)(1)

Description: Failure to comply with the carbon monoxide 400 PPM 24 hour rolling average limit for Furnaces F1 through F7.
Viol. Classification: Moderate
Citation: 30 TAC Chapter 117, SubChapter B 117.310(c)(1)(A)
30 TAC Chapter 117, SubChapter B 117.340(e)
30 TAC Chapter 117, SubChapter G 117.8100(a)(1)(B)(iii)
Rqmt Prov: PERMIT SC No. 30

Description: Failure to measure and record CO concentration from the Heaters OC6S1 through OC6S10 due to insufficient rang for CO on the continuous emission monitoring system.
Disclosure Date: 06/07/2017
Viol. Classification: Moderate
Citation: 40 CFR Chapter 262, SubChapter I, PT 262, SubPT C 262.34(c)(1)

Description: Failure to properly label two containers in the lab located at LHC-8 that were mislabeled as hazardous waste containers.
Viol. Classification: Moderate
Citation: 40 CFR Chapter 265, SubChapter I, PT 265, SubPT C 265.32
40 CFR Chapter 265, SubChapter I, PT 265, SubPT C 265.33

Description: Failure to ensure that adequate safety equipment is maintained at the <90 day container storage areas 761 and container storage area 288.
Viol. Classification: Moderate
Citation: 40 CFR Chapter 262, SubChapter I, PT 262, SubPT C 262.34(a)
40 CFR Chapter 265, SubChapter I, PT 265, SubPT I 265.173
40 CFR Chapter 265, SubChapter I, PT 265, SubPT C 265.32
40 CFR Chapter 265, SubChapter I, PT 265, SubPT C 265.33

Description: Failure keep two hazardous waste containers closed when not being actively filled or emptied.
Viol. Classification: Moderate
Citation: 40 CFR Chapter 265, SubChapter I, PT 265, SubPT D 265.52
30 TAC Chapter 335, SubChapter E 335.112(a)(3)

Description: Failure to maintain a complete and up to date RCRA contingency plan. Specifically, the personnel list/job description was missing, the list of emergency coordinator was not up to date, the plan does not list the capabilities and location of the emergency equipment, and the plan does not include an evacuation plan.
Viol. Classification: Moderate
Citation: 40 CFR Chapter 273, SubChapter I, PT 273, SubPT B 273.13
40 CFR Chapter 273, SubChapter I, PT 273, SubPT C 273.33

Description: Failure to ensure that universal waste containers in the universal waste storage area are maintained closed.

Viol. Classification: Moderate

Citation: 30 TAC Chapter 335, SubChapter A 335.10

Description: Failure to maintain Department of Transportation shipping papers for waste shipped to Texas Operation for at least three years from the date of delivery.

Disclosure Date: 10/23/2017

Viol. Classification: Moderate

Citation: 30 TAC Chapter 115, SubChapter D 115.354(2)(C)

30 TAC Chapter 335, SubChapter A 335.10

40 CFR Chapter 63, SubChapter C, PT 63, SubPT UU 63.1025(b)(1)

40 CFR Chapter 63, SubChapter C, PT 63, SubPT UU 63.1025(b)(2)

40 CFR Chapter 63, SubChapter C, PT 63, SubPT UU 63.1025(b)(3)

Description: Failure to include 23 connectors and ten valves in the fugitive monitoring program.

Notice of Intent Date: 04/13/2017 (1409085)

Disclosure Date: 10/23/2017

Viol. Classification: Moderate

Citation: 30 TAC Chapter 115, SubChapter H 115.781

Description: Failure to ensure that 132 components in HRVOC service are identified as HRVOC components.

Notice of Intent Date: 04/20/2017 (1410910)

Disclosure Date: 10/23/2017

Viol. Classification: Moderate

Citation: 30 TAC Chapter 115, SubChapter E 115.463(a)(1)

Description: Failure to ensure that Reg V industrial cleaning solvent used meet applicable exemptions or control requirements.

Disclosure Date: 05/14/2018

Viol. Classification: Moderate

Citation: 30 TAC Chapter 115, SubChapter E 115.463(a)(1)

Rqmt Prov: OP ST&C

Description: Failure to ensure that Reg. V Industrial Cleaning Solvent exemption documentation is completed properly.

Viol. Classification: Moderate

Citation: 30 TAC Chapter 115, SubChapter E 115.463(a)(1)

Rqmt Prov: OP ST&C

Description: Failure to maintain copies of the Safety Data Sheets for industrial cleaning solvent used at Dow - Texas Operations.

Notice of Intent Date: 04/28/2017 (1410706)

Disclosure Date: 10/23/2017

Viol. Classification: Moderate

Citation: 30 TAC Chapter 117, SubChapter A 117.10

Description: Failure to permit portable engines that have been in service at their assigned locations longer than 12 months. Portable engines that are in service longer than 12 months no longer meet the definition of a mobile source.

Viol. Classification: Moderate

Citation: 30 TAC Chapter 111, SubChapter A 111.111(a)(1)(A)

Rqmt Prov: OP ST&C 3.A.iv.1.

Description: Failure to conduct quarterly visible emissions observations on engines which were run during the first month of the quarter but then were out of service during Months 2 and 3 of the quarter.

Disclosure Date: 03/27/2018

Viol. Classification: Moderate

Citation: 30 TAC Chapter 106, SubChapter U 106.472

30 TAC Chapter 106, SubChapter A 106.8(c)(1)

30 TAC Chapter 122, SubChapter B 122.134(b)

Rqmt Prov: OP ST&C 22

Description: Failure to list the diesel storage tanks in Title V Permit O2211 and include 30 TAC 115 storage regulations as applicable and failure to maintain PBR authorization documentation.

Viol. Classification: Moderate

Citation: 40 CFR Chapter 63, SubChapter C, PT 63, SubPT ZZZZ 63.6602

40 CFR Chapter 63, SubChapter C, PT 63, SubPT ZZZZ 63.6655(e)

Rqmt Prov: OP ST&Cs

Description: Failure to maintain records of annual engine maintenance per RICE MACT.

Notice of Intent Date: 04/28/2017 (1410710)

Disclosure Date: 10/11/2017

Viol. Classification: Minor
Citation: 30 TAC Chapter 115, SubChapter D 115.354
30 TAC Chapter 116, SubChapter B 116.115(c)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.160(a)
Rqmt Prov: PERMIT SC No. 16
Description: Failure to ensure that two valves and eight connectors are being monitored and required and reported or included in the % leaker calculations.
Disclosure Date: 04/27/2018
Viol. Classification: Moderate
Citation: 30 TAC Chapter 115, SubChapter C 115.217(a)(1)
Description: Failure to ensure that facility records correctly indicate that seven loading and unloading activities involving VOCs are subject to Regulation V.

Notice of Intent Date: 05/03/2017 (1415095)
No DOV Associated

Notice of Intent Date: 05/03/2017 (1415103)
Disclosure Date: 09/28/2017
Viol. Classification: Moderate
Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
Rqmt Prov: OP SC 14
PERMIT SC 19E
Description: Failure to equip open ended lines with an appropriately sized cap, blind flange, plug, or a second valve to seal the line.

Notice of Intent Date: 05/26/2017 (1417377)
Disclosure Date: 04/27/2018
Viol. Classification: Moderate
Citation: 40 CFR Chapter 63, SubChapter C, PT 63, SubPT GGG 63.1250
Description: Failure to ensure that HON Group 1 process vents from reactors R600-A and R-600B are vented to a control device to reduce organic HAP to an outlet concentration <20 ppmv during some batch steps.

Notice of Intent Date: 05/25/2017 (1417427)
Disclosure Date: 10/20/2017
Viol. Classification: Moderate
Citation: 40 CFR Chapter 70, SubChapter C, PT 70 70.5(c)
Description: Failure to include referenced to applicable requirements in 30 TAC 115, Subchapter H, Division 3: HRVOC Fugitive Emissions and 30 TAC 111.111 in the Title V Permit O2219.
Viol. Classification: Moderate
Citation: 30 TAC Chapter 115, SubChapter H 115.725(a)
30 TAC Chapter 115, SubChapter H 115.726(e)(3)(A)
30 TAC Chapter 115, SubChapter H 115.727(c)(2)
30 TAC Chapter 115, SubChapter H 115.729(b)
Description: Failure to properly represent the B2045 reactor vents on the site's HRVOC vent small source cap exemption documentations after the vents were routed to the atmosphere rather than a control device.

Notice of Intent Date: 06/08/2017 (1422512)
No DOV Associated

Notice of Intent Date: 06/20/2017 (1424123)
Disclosure Date: 08/14/2017
Viol. Classification: Moderate
Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
Description: Failure to prevent three open-ended lines.
Viol. Classification: Moderate
Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.181(c)
Rqmt Prov: PERMIT 10E & 10K
Description: Failure to properly document AVO inspections for the weeks of 4/18/16, 4/19/16, 6/20/16, 6/27/16, 2/17/17, and 5/15/17.
Viol. Classification: Moderate
Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
Rqmt Prov: PERMIT SC 10E & 10K
Description: Failure to document the AVO inspection for the week of March 6, 2017.

Notice of Intent Date: 06/26/2017 (1424128)
No DOV Associated

Notice of Intent Date: 07/07/2017 (1428675)
Disclosure Date: 10/23/2017

Viol. Classification: Moderate
Citation: 30 TAC Chapter 115, SubChapter H 115.725(c)(1)
30 TAC Chapter 115, SubChapter H 115.725(c)(3)

Description: Failure to ensure that 34 pressure relief valves in HRVOC service are in compliance with HRVOC monitoring and recordkeeping requirements.

Notice of Intent Date: 07/06/2017 (1428716)
Disclosure Date: 11/13/2017

Viol. Classification: Moderate
Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
Rqmt Prov: PERMIT SC 24.B.

Description: Failure to maintain records of the weekly NH3 stain tube monitoring data for the month of May 2017.

Viol. Classification: Moderate
Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
Rqmt Prov: PERMIT SC 24.B.

Description: Failure to ensure that the stain tube sampling methodology is sufficient to determine the NH3 concentration in the Furnace Exhaust Stack identified as EPN A36S621.

Notice of Intent Date: 07/03/2017 (1428796)
Disclosure Date: 11/15/2017

Viol. Classification: Moderate
Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.167(a)(1)
Rqmt Prov: PERMIT SC 28.E.

Description: Failure to prevent three open ended lines. In addition, four sampling systems were found to have open ended lines.

Viol. Classification: Moderate
Citation: 40 CFR Chapter 63, SubChapter C, PT 63, SubPT MMM 63.1364(a)(1)

Description: Failure to implement parameter monitoring for two pressure relief devices in OHAP service.

Viol. Classification: Moderate
Citation: 40 CFR Chapter 63, SubChapter C, PT 63, SubPT MMM 63.1363(h)(2)(iv)

Description: Failure to ensure that two pressure relief devices are reported on the PAIP NOCS regarding pressure relief monitoring requirements.

Viol. Classification: Moderate
Citation: 40 CFR Chapter 63, SubChapter C, PT 63, SubPT MMM 63.1368(f)(1)

Description: Failure to ensure that the PAIP NOCS has the correct classification for Tank D-106D.

Viol. Classification: Moderate
Citation: 30 TAC Chapter 122, SubChapter B 122.132(d)(3)(A)
Rqmt Prov: OP Title V Permit O2206

Description: Failure to ensure that Title V Permit O2206 has the correct applicable requirements for A32CPST06D.

Viol. Classification: Moderate
Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)

Description: Failure to ensure that Scrubber T-790 is operated at 99.99% efficiency for HCl and 99.9% efficiency for Chlorine on an hourly basis.

Notice of Intent Date: 07/12/2017 (1428799)
No DOV Associated

Notice of Intent Date: 07/13/2017 (1428800)
Disclosure Date: 12/07/2017

Viol. Classification: Moderate
Citation: 40 CFR Chapter 63, SubChapter C, PT 63, SubPT PPP 63.1425(b)
Rqmt Prov: PERMIT SC 22

Description: Failure to maintain the minimum gpm on Scrubber B43SV1 to achieve appropriate control efficiency.

Notice of Intent Date: 07/14/2017 (1429618)
Disclosure Date: 05/04/2018

Viol. Classification: Moderate
Citation: 40 CFR Chapter 60, SubChapter C, PT 60, SubPT A 60.18
Rqmt Prov: PERMIT PBR Registration No. 138297

Description: Failure to comply with the FS-100 Flare hourly net heating value while optimizing the operation of monitoring systems for waste gas and steam flow.

Notice of Intent Date: 07/14/2017 (1429620)

Disclosure Date: 10/23/2017

Viol. Classification: Moderate

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

Rqmt Prov: PERMIT SC 4.C(1)

Description: Failure to maintain records of calibration within 30 days of use for lower explosive limit detector for MSS compliance.

Notice of Intent Date: 07/25/2017 (1431088)

Disclosure Date: 03/07/2018

Viol. Classification: Moderate

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

Rqmt Prov: PERMIT SC 11.B.

PERMIT SC 5.C.

Description: Failure to maintain the minimum stack O2 and minimum firebox temperature on the TOX.

Viol. Classification: Moderate

Citation: 40 CFR Chapter 60, SubChapter C, PT 60, SubPT A 60.18(c)(4)(iii)

Rqmt Prov: PERMIT SC 4.B.

Description: Failure to comply with the maximum allowable exit velocity at the steam assisted stage of the Multi-Point Ground Flare due to a lack of process control of low BTU containing streams.

Viol. Classification: Moderate

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

Rqmt Prov: PERMIT SC 3.B.

PERMIT SC 8.B.iii.

Description: Failure to comply with the hourly average CO concentration limit at Furnace H-127.

Viol. Classification: Moderate

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

Rqmt Prov: PERMIT SC 13.G.

PERMIT SC 25.E.

Description: Failure to comply with the maximum vent gas flow rate to the TOX as established during the initial performance test.

Notice of Intent Date: 07/26/2017 (1431094)

Disclosure Date: 11/21/2017

Viol. Classification: Moderate

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

Rqmt Prov: PERMIT GC 9

Description: Failure to ensure that air pollution emissions capture and abatement equipment is maintained in good working order. There was a loss of scrubber packing, but no unauthorized emissions occurred.

Notice of Intent Date: 08/03/2017 (1434988)

Disclosure Date: 10/23/2017

Viol. Classification: Moderate

Citation: 30 TAC Chapter 115, SubChapter E 115.412(1)(C)

Description: Failure to ensure that there is a permanent label detailing operating requirements on multiple cold solvent cleaners on site.

Viol. Classification: Moderate

Citation: 30 TAC Chapter 122, SubChapter B 122.121

Description: Failure to obtain authorization for a cold solvent cleaner prior to it being installed.

Disclosure Date: 03/27/2018

Viol. Classification: Moderate

Citation: 30 TAC Chapter 115, SubChapter E 115.412(1)(F)(ii)

Description: Failure to ensure that the lid on a cold solvent cleaner is maintained closed while not handling parts.

Notice of Intent Date: 08/04/2017 (1435002)

No DOV Associated

Notice of Intent Date: 08/09/2017 (1436901)

Disclosure Date: 11/10/2017

Viol. Classification: Minor

Citation: 40 CFR Part 63, Subpart H 63.163

Rqmt Prov: PERMIT SC 16.E.

Description: Failure to ensure that records of AVO inspections are complete and properly documented during the weeks of April 14, 2017 and July 2, 2017.

Viol. Classification: Moderate

Citation: 40 CFR Chapter 63, SubChapter C, PT 63, SubPT SS 63.998

Description: Failure to prevent intermittent inaccurate reading from process vent flow meters to the scrubbers D-596 and D-896 which caused unreliable compliance scrubber parameter data.

Disclosure Date: 02/21/2018

Viol. Classification: Moderate

Citation: 40 CFR Chapter 60, SubChapter C, PT 60, SubPT A 60.18

40 CFR Chapter 60, SubChapter C, PT 60, SubPT NNN 60.665

40 CFR Chapter 63, SubChapter C, PT 63, SubPT G 63.152(c)(2)(ii)(A)

40 CFR Chapter 63, SubChapter C, PT 63, SubPT SS 63.998

Rqmt Prov: PERMIT SC 2.C.

OP Title V Permit O2203

Description: Failure to maintain 72 hours of continuous monitoring data while transferring to a new record keeping system.

Disclosure Date: 05/08/2018

Viol. Classification: Moderate

Citation: 40 CFR Chapter 60, SubChapter C, PT 60, SubPT A 60.18

Description: Failure to comply with the BTU heating value requirements of 40 CFR 60.18 for a sum total of seven hours for the FS-801 Flare.

Notice of Intent Date: 08/08/2017 (1436904)

Disclosure Date: 01/24/2018

Viol. Classification: Moderate

Citation: 40 CFR Chapter 63, SubChapter C, PT 63, SubPT SS 63.996(c)

Rqmt Prov: OP O2203 SC 1.F.

PERMIT SC 17.C.

Description: Failure to calibrate the B-54 Ethylene Oxide Distribution control device T-6 scrubber flow monitoring meters during 2017.

Notice of Intent Date: 08/07/2017 (1436917)

No DOV Associated

Notice of Intent Date: 08/14/2017 (1436879)

Disclosure Date: 11/17/2017

Viol. Classification: Moderate

Citation: 30 TAC Chapter 115, SubChapter D 115.354

30 TAC Chapter 116, SubChapter B 116.115(c)

40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.160(a)

Rqmt Prov: PERMIT SC 16

Description: Failure to monitor nine valves and 43 connectors and/or failure to report them or include them in the % leaker calculations.

Disclosure Date: 12/27/2018

Viol. Classification: Moderate

Citation: 30 TAC Chapter 115, SubChapter D 115.354

30 TAC Chapter 116, SubChapter B 116.115(c)

40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.160(a)

Rqmt Prov: PERMIT SC No. 4D & 19, 28 MID

Description: Failure to monitor and/or report or include in the percent leaker calculations 102 valves and 383 connectors.

Notice of Intent Date: 08/14/2017 (1436903)

Disclosure Date: 10/11/2017

Viol. Classification: Moderate

Citation: 30 TAC Chapter 115, SubChapter D 115.354

30 TAC Chapter 116, SubChapter B 116.115(c)

40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.160(a)

Rqmt Prov: PERMIT SC 16

Description: Failure to ensure that 13 valves and 50 connectors are being monitored as required and/or reported or included in the % leaker calculations.

Disclosure Date: 05/24/2018

Viol. Classification: Moderate

Citation: 30 TAC Chapter 115, SubChapter D 115.354

30 TAC Chapter 116, SubChapter B 116.115(c)

40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.160(a)

Rqmt Prov: PERMIT SC No. 16.E.

Description: Failure to prevent eight screwed connectors that were identified as being >2 inches.

Disclosure Date: 10/24/2018

Viol. Classification: Moderate

Citation: 30 TAC Chapter 115, SubChapter D 115.354

30 TAC Chapter 116, SubChapter B 116.115(c)

40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.160(a)

Rqmt Prov: PERMIT SC No. 16.E.

Description: Failure to prevent 18 screwed connectors that were identified as being greater than 2".

Viol. Classification: Moderate

Citation: 30 TAC Chapter 101, SubChapter A 101.10(b)

Description: Failure to prevent the inadvertent inclusion of 154 valves, 947 connectors, and 4 relief valves in the fugitive emissions database.

Disclosure Date: 11/26/2018

Viol. Classification: Minor

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

Rqmt Prov: PERMIT Reg V HON

Description: Failure to monitor five valves and 61 connectors as being monitored as required and/or reported or included in the percentage leaker calculations.

Notice of Intent Date: 08/15/2017 (1436906)

Disclosure Date: 09/25/2017

Viol. Classification: Moderate

Citation: 30 TAC Chapter 117, SubChapter B 117.310(c)(1)

Description: Failure to comply with the carbon monoxide 400 ppm one hour average limit and carbon monoxide limits contained in PBR No. 135528 for Downtherm Heater H-575.

Notice of Intent Date: 08/15/2017 (1436908)

No DOV Associated

Notice of Intent Date: 08/17/2017 (1436967)

Disclosure Date: 11/13/2017

Viol. Classification: Moderate

Citation: 40 CFR Part 63, Subpart H 63.168

40 CFR Part 63, Subpart H 63.174

Rqmt Prov: PERMIT SC 16

Description: Failure to monitor eight valves and ten connectors as required.

Disclosure Date: 03/07/2018

Viol. Classification: Moderate

Citation: 40 CFR Part 63, Subpart H 63.163

Rqmt Prov: OP SC 1.E.

Description: Failure to monitor one pump periodically as required.

Viol. Classification: Moderate

Citation: 40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.168

4F TWC Chapter 63, SubChapter A 63.174

Rqmt Prov: OP SC 1.E. and 21

PERMIT SC 16

Description: Failure to monitor ten valves and 35 connectors periodically as required.

Notice of Intent Date: 08/25/2017 (1430253)

Disclosure Date: 11/10/2017

Viol. Classification: Moderate

Citation: 30 TAC Chapter 116, SubChapter B 116.111(a)(2)

Description: Failure to ensure that calculations are based on accurate representations, which resulted in error in emissions limits.

Notice of Intent Date: 09/05/2017 (1437976)

Disclosure Date: 11/10/2017

Viol. Classification: Moderate

Citation: 40 CFR Chapter 265, SubChapter I, PT 265, SubPT I 265.174

Description: Failure to complete the weekly inspection of the less than 90 day container storage locations due to access and staffing issues.

Viol. Classification: Moderate

Citation: 30 TAC Chapter 115, SubChapter D 115.354(11)

Description: Failure to complete initial tagging and monitoring for the new and reworked piping due to site evacuation and Hurricane Harvey.

Notice of Intent Date: 09/08/2017 (1438825)

Disclosure Date: 10/23/2017

Viol. Classification: Moderate

Citation: 40 CFR Chapter 63, SubChapter C, PT 63, SubPT EEE 63.1209(b)(2)

Description: Failure to ensure that calibration of a flow meter is performed on the frequency documented in the HWC MACT Continuous Monitoring System Performance Evaluation Plan.

Disclosure Date: 04/16/2018

Viol. Classification: Moderate

Citation: 40 CFR Chapter 264, SubChapter I, PT 264, SubPT O 264.345(e)

40 CFR Chapter 63, SubChapter C, PT 63, SubPT EEE 63.1206(c)(3)

Rqmt Prov: OP Title V Permit O2211

PERMIT V.H.3.B.(3)

Description: Failure to ensure that the Automatic Waste Feed Cutoff system is triggered for the carbon monoxide requirements under HWC MACT and RCRA due to a calculation error in the system control program.

Viol. Classification: Moderate

Citation: 30 TAC Chapter 117, SubChapter B 117.340(a)

Rqmt Prov: PERMIT Title V Permit O2211

Description: Failure to ensure that the fuel flow meter is reading accurately.

Viol. Classification: Moderate

Citation: 30 TAC Chapter 305, SubChapter F 305.125(1)

Rqmt Prov: PERMIT V.I.7.a

Description: Failure to ensure that monitoring for RCRA Permit Maximum HCl Production Rate is correctly being calculated on an hourly rolling average basis.

Notice of Intent Date: 09/08/2017 (1438833)

No DOV Associated

Notice of Intent Date: 09/14/2017 (1439061)

Disclosure Date: 03/08/2018

Viol. Classification: Moderate

Citation: 30 TAC Chapter 115, SubChapter D 115.354(11)

Description: Failure to conduct initial monitoring of 3264 connectors within 30 days.

Viol. Classification: Moderate

Citation: 40 CFR Chapter 63, SubChapter C, PT 63, SubPT UU 63.1025(b)(3)(ii)

Rqmt Prov: PERMIT SC 16.F.

Description: Failure to conduct quarterly monitoring of 492 valves and 1227 connectors during the 4th quarter 2017.

Notice of Intent Date: 09/25/2017 (1446556)

Disclosure Date: 10/20/2017

Viol. Classification: Moderate

Citation: 30 TAC Chapter 115, SubChapter H 115.725(c)

30 TAC Chapter 115, SubChapter H 115.725(d)

40 CFR Chapter 70, SubChapter C, PT 70 70.5(c)

Description: Failure to include referenced to applicable requirements and exemptions in 30 TAC 115, Subchapter H, Division 1: Highly Reactive Volatile Organic Compound Vent Gas Control from the Title V Permit O2219.

Viol. Classification: Moderate

Citation: 30 TAC Chapter 115, SubChapter H 115.766(c)

40 CFR Chapter 70, SubChapter C, PT 70 70.5(c)

Description: Failure to include a reference in the Title V Permit O2219 to applicable exemptions in 30 TAC 115, Subchapter H, Division 2: Cooling Tower Heat Exchange Systems and the corresponding exemption record keeping requirements in 115.766(b) and (c).

Notice of Intent Date: 09/29/2017 (1446564)

No DOV Associated

Notice of Intent Date: 09/27/2017 (1446591)

Disclosure Date: 04/16/2018

Viol. Classification: Moderate

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

Rqmt Prov: OP GC 15

PERMIT SC 1

Description: Failure to comply with hourly MAERT limit in NSR 114991 of 0.01 lb/hr VOC on B83CY921 and B83CY923

EPNs based on DDD test results.

Notice of Intent Date: 10/04/2017 (1439655)

Disclosure Date: 12/07/2017

Viol. Classification: Moderate

Citation: 30 TAC Chapter 115, SubChapter B 115.121(a)(1)
30 TAC Chapter 115, SubChapter B 115.122(a)(1)

Rqmt Prov: OP Periodic Monitoring Summary

Description: Failure to timely record the weekly data review for Control Devices B13PGSV22, B13PGSV3, B17SV384, and B43IPSV1.

Viol. Classification: Moderate

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

Rqmt Prov: PERMIT SC 8.C.

Description: Failure to maintain records of emission and tank throughput for tanks B13ST3 and B43ST105.

Disclosure Date: 04/02/2018

Viol. Classification: Moderate

Citation: 30 TAC Chapter 115, SubChapter B 115.121(a)(2)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.163(b)(3)

Rqmt Prov: OP SC 1.E.
PERMIT SC 5 and 6

Description: Failure to monitor eight connectors in light liquid service as required.

Viol. Classification: Moderate

Citation: 30 TAC Chapter 115, SubChapter B 115.121(a)(2)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.163(b)(3)

Rqmt Prov: OP SC 1.E.
PERMIT SC 5

Description: Failure to maintain one AVO inspection records as required.

Viol. Classification: Moderate

Citation: 30 TAC Chapter 115, SubChapter B 115.121(a)(1)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.163(b)(3)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.173(b)(1)

Rqmt Prov: PERMIT SC 1.E.
PERMIT SC 5

Description: Failure to complete four weekly AVO inspections during a calendar week.

Viol. Classification: Moderate

Citation: 30 TAC Chapter 106, SubChapter K 106.262

Description: Failure to comply with the maximum operating hours in the PBR application for the methylamine railcar water jet ejector EPN B13WJMA01.

Viol. Classification: Moderate

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

Rqmt Prov: PERMIT SC 6 & 8

Description: Failure to monitor nine connectors in light liquid service as required.

Disclosure Date: 05/29/2018

Viol. Classification: Moderate

Citation: 30 TAC Chapter 115, SubChapter B 115.121(a)(1)
30 TAC Chapter 115, SubChapter B 115.122(a)(1)

Rqmt Prov: OP Periodic Monitoring Summary

Description: Failure to timely record the weekly data review for Control Devices B13PGSV22, B13PGSV3, B17SV384, and B43IPSV1.

Viol. Classification: Moderate

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

Rqmt Prov: PERMIT SC 8.C.

Description: Failure to maintain records of emission and tank throughput for tanks B13ST3 and B43ST105.

Viol. Classification: Moderate

Citation: 30 TAC Chapter 115, SubChapter B 115.121(a)(2)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.163(b)(3)

Rqmt Prov: OP SC 1.E.
PERMIT SC 5 and 6

Description: Failure to monitor eight connectors in light liquid service as required.

Viol. Classification: Moderate

Citation: 30 TAC Chapter 115, SubChapter B 115.121(a)(2)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.163(b)(3)

Rqmt Prov: OP SC 1.E.

PERMIT SC 5

Description: Failure to maintain one AVO inspection records as required.

Viol. Classification: Moderate

Citation: 30 TAC Chapter 115, SubChapter B 115.121(a)(1)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.163(b)(3)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.173(b)(1)

Rqmt Prov: PERMIT SC 1.E.

PERMIT SC 5

Description: Failure to complete four weekly AVO inspections during a calendar week.

Viol. Classification: Moderate

Citation: 30 TAC Chapter 106, SubChapter K 106.262

Description: Failure to comply with the maximum operating hours in the PBR application for the methylamine railcar water jet ejector EPN B13WJMA01.

Viol. Classification: Moderate

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

Rqmt Prov: PERMIT SC 6 & 8

Description: Failure to monitor nine connectors in light liquid service as required.

Viol. Classification: Moderate

Citation: 30 TAC Chapter 115, SubChapter B 115.121(a)(2)

Rqmt Prov: OP SC 1(J)

PERMIT SC NOs. 3 and 5.E.

Description: Failure to complete two weekly AVO inspection during a calendar week.

Notice of Intent Date: 10/06/2017 (1447722)

No DOV Associated

Notice of Intent Date: 10/19/2017 (1448830)

No DOV Associated

Notice of Intent Date: 10/19/2017 (1448837)

Disclosure Date: 03/07/2018

Viol. Classification: Moderate

Citation: 40 CFR Chapter 63, SubChapter C, PT 63, SubPT G 63.113(a)(1)(ii)

Rqmt Prov: OP SC 1D and 16

PERMIT SC No. 5

Description: Failure to ensure that the halogenated vent stream is routed correctly. Specifically the halogenated vent stream was sent to the B75 FS1 flare.

Viol. Classification: Moderate

Citation: 30 TAC Chapter 115, SubChapter D 115.354(1)

30 TAC Chapter 115, SubChapter D 115.354(2)

40 CFR Part 63, Subpart H 63.168

40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.168(d)(1)(ii)

Rqmt Prov: OP Sc 1H and 16

Description: Failure to conduct quarterly monitoring on one valve.

Notice of Intent Date: 10/19/2017 (1448850)

No DOV Associated

Notice of Intent Date: 11/03/2017 (1454343)

No DOV Associated

Notice of Intent Date: 11/07/2017 (1454315)

Disclosure Date: 04/16/2018

Viol. Classification: Moderate

Citation: 30 TAC Chapter 115, SubChapter D 115.354(11)

30 TAC Chapter 115, SubChapter D 115.354(2)

30 TAC Chapter 115, SubChapter H 115.781(b)(2)

30 TAC Chapter 115, SubChapter H 115.781(b)(3)

40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.168

Rqmt Prov: PERMIT SC Nos. 20 and 19F

Description: Failure to conduct fugitive monitoring of 37 connectors and 11 valves.

Notice of Intent Date: 11/09/2017 (1454356)

No DOV Associated

Notice of Intent Date: 11/22/2017 (1455658)

Disclosure Date: 04/16/2018

Viol. Classification: Moderate

Citation: 30 TAC Chapter 116, SubChapter B 116.111(a)(2)(G)

Rqmt Prov: PERMIT NSR Permit 46428

OP ST&C No. 21

Description: Failure to comply with the permit representation of 2 ppmv. Specifically, sampling indicates NOx concentrations are outside of permit representations during certain operating scenarios implemented in 2005 without additional permit authorization.

Notice of Intent Date: 11/30/2017 (1459365)

Disclosure Date: 04/16/2018

Viol. Classification: Moderate

Citation: 30 TAC Chapter 106, SubChapter K 106.261(a)(7)(A)

30 TAC Chapter 106, SubChapter K 106.262(a)(2)

Rqmt Prov: OP ST&C No. 22

Description: Failure to obtain permit-by-rule authorization for additionally installed fugitive emissions components on vent piping.

Viol. Classification: Moderate

Citation: 30 TAC Chapter 101, SubChapter A 101.10

Rqmt Prov: OP ST&C 2E

Description: Failure to submit an Annual Emissions Inventory for one emergency use diesel engine.

Viol. Classification: Moderate

Citation: 30 TAC Chapter 116, SubChapter B 116.115

Rqmt Prov: PERMIT SC No. 3

OP ST&C No. 21

Description: Failure to maintain one month of Thermal Assets sampling records of the vapor space on equipment prior to opening to the atmosphere.

Notice of Intent Date: 12/01/2017 (1459370)

Disclosure Date: 05/14/2018

Viol. Classification: Moderate

Citation: 30 TAC Chapter 115, SubChapter D 115.354

Rqmt Prov: PERMIT SCs

OP ST&C

Description: Failure to tag and monitor fugitive components.

Viol. Classification: Moderate

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

Rqmt Prov: PERMIT MAERT

OP ST&C

Description: Failure to comply with the emission limits of NSR 6932 when an online analyzer indicated additional methane at Flare FS-1.

Viol. Classification: Moderate

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

Rqmt Prov: PERMIT MAERT

OP ST&C

Description: Failure to comply with the VOC emissions limits in NSR 18950 for Flare FS-900.

Notice of Intent Date: 11/30/2017 (1459379)

No DOV Associated

Notice of Intent Date: 12/01/2017 (1459387)

Disclosure Date: 04/17/2018

Viol. Classification: Moderate

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

Rqmt Prov: PERMIT SC No. 33

Description: Failure to maintain records of particulate emissions from catalyst handling during maintenance.

Viol. Classification: Moderate

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

Rqmt Prov: PERMIT SC No. 1

Description: Failure to prevent or obtain authorization for unauthorized emissions from catalyst fines removal in the lock hopper vent drums.

Notice of Intent Date: 12/01/2017 (1459391)

Disclosure Date: 04/16/2018

Viol. Classification: Moderate

Citation: 30 TAC Chapter 122, SubChapter C 122.222(c)
30 TAC Chapter 122, SubChapter C 122.222(k)(2)

Description: Failure to submit a timely Title V OP-Notify for the Solvent Throughput Increase Project.

Viol. Classification: Moderate

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

Rqmt Prov: OP GC No. 15

PERMIT SC 1

Description: Failure to comply with permit representation for the Cooling Tower TDS average value which is running higher than average permit representations.

Viol. Classification: Moderate

Citation: 30 TAC Chapter 116, SubChapter B 116.110(a)
30 TAC Chapter 116, SubChapter B 116.111

Description: Failure to represent the hydrogenation check tank vents in NSR 114991.

Viol. Classification: Moderate

Citation: 30 TAC Chapter 116, SubChapter B 116.116

Rqmt Prov: PERMIT GC No. 1

Description: Failure to conduct AVO rounds for fugitive components in HCl service.

Notice of Intent Date: 12/13/2017 (1459394)

No DOV Associated

Notice of Intent Date: 01/09/2018 (1465730)

Disclosure Date: 04/18/2018

Viol. Classification: Moderate

Citation: 40 CFR Chapter 61, SubChapter C, PT 61, SubPT FF 61.355(h)

Rqmt Prov: OP Title V Permit O2213

Description: Failure to conduct initial monitoring for 24 containers.

Disclosure Date: 10/25/2018

Viol. Classification: Moderate

Citation: 40 CFR Chapter 262, SubChapter I, PT 262, SubPT A 262.17(a)

Description: Failure to comply with <90 day storage requirement for RCRA Hazardous Waste for one container.

Notice of Intent Date: 01/30/2018 (1471059)

Disclosure Date: 03/28/2018

Viol. Classification: Moderate

Citation: 30 TAC Chapter 122, SubChapter B 122.144

Description: Failure to maintain records to demonstrate continuous compliance with PBR 106.477 and failure to ensure that the PBR is listed in Title V Permit O2697.

Disclosure Date: 05/11/2018

Viol. Classification: Moderate

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

Rqmt Prov: PERMIT SC 9(A)

OP ST&C

Description: Failure to track fuel gas maintenance/startup/shutdown clearing activities in a recordkeeping system.

Viol. Classification: Moderate

Citation: 40 CFR Chapter 61, SubChapter C, PT 61, SubPT FF 61.345(a)(1)(i)
40 CFR Chapter 61, SubChapter C, PT 61, SubPT FF 61.345(a)(1)(ii)

Rqmt Prov: OP ST&C

Description: Failure to ensure that containers subject to Benzene Waste NESHAP are monitored annually, reported quarterly and are maintained with a cover on container when used to store waste.

Notice of Intent Date: 02/07/2018 (1472116)

Disclosure Date: 02/28/2018

Viol. Classification: Moderate

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

Description: Failure to properly maintain record keeping requirements for MSS activities. Specifically, the EPN represented in the application for MSS emissions was different than the EPN that was included in the issued NSRP 22070 for MSS emission.

Disclosure Date: 08/08/2018

Viol. Classification: Moderate

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

Rqmt Prov: PERMIT SC No. 6

OP ST&C 1.A.

Description: Failure to ensure that submerged loading at A28LR3 is being conducted as represented in permit representations.

Notice of Intent Date: 02/13/2018 (1472930)
No DOV Associated

Notice of Intent Date: 03/08/2018 (1478386)

Disclosure Date: 04/18/2018

Viol. Classification: Moderate

Citation: 40 CFR Chapter 265, SubChapter I, PT 265, SubPT B 265.15(d)
40 CFR Chapter 265, SubChapter I, PT 265, SubPT I 265.174
30 TAC Chapter 335, SubChapter C 335.69(a)(1)(A)

Description: Failure to conduct and/or maintain records of weekly inspections of the <90 day hazardous waste container storage are for NOR #266, 281, 422, 423, and 449).

Viol. Classification: Moderate

Citation: 40 CFR Chapter 264, SubChapter I, PT 264, SubPT B 264.14(c)
30 TAC Chapter 335, SubChapter F 335.152(a)(1)

Rqmt Prov: PERMIT Section III.C.2 and III.E.5.d

Description: Failure to ensure that the warning signs for NOR# 025 and 107 are complete and include all required information.

Disclosure Date: 02/27/2019

Viol. Classification: Moderate

Citation: 40 CFR Chapter 265, SubChapter I, PT 265, SubPT B 265.15(d)
40 CFR Chapter 265, SubChapter I, PT 265, SubPT I 265.174
30 TAC Chapter 335, SubChapter A 335.6(c)
30 TAC Chapter 335, SubChapter C 335.69(a)(1)(A)

Description: Failure to ensure that six containers storing hazardous waste are stored in the <90 day container storage area.

Viol. Classification: Moderate

Citation: 40 CFR Chapter 262, SubChapter I, PT 262, SubPT C 262.34(a)
40 CFR Chapter 265, SubChapter I, PT 265, SubPT B 265.15(d)

Description: Failure to ensure that six containers were not stored for greater than 90 days in NOR 429 and weekly inspection did not note that the container were greater than 90 days.

Viol. Classification: Moderate

Citation: 30 TAC Chapter 101, SubChapter A 101.10
40 CFR Chapter 266, SubChapter I, PT 266, SubPT H 266.102(e)(1)
40 CFR Chapter 266, SubChapter I, PT 266, SubPT H 266.106(b)(8)
40 CFR Chapter 266, SubChapter I, PT 266, SubPT H 266.106(c)(3)
40 CFR Chapter 266, SubChapter I, PT 266, SubPT H 266.106(d)(6)
40 CFR Chapter 266, SubChapter I, PT 266, SubPT H 266.107
30 TAC Chapter 335, SubChapter A 335.9(a)(2)

Description: Failure to ensure accurate records for waste feed monitoring, annual waste reporting, and emissions reporting when the record keeping for a waste stream was erroneously combined with record keeping for a separate waste stream.

Notice of Intent Date: 03/08/2018 (1479271)
No DOV Associated

Notice of Intent Date: 03/15/2018 (1479716)

Disclosure Date: 05/18/2018

Viol. Classification: Moderate

Citation: 30 TAC Chapter 115, SubChapter D 115.354(1)
30 TAC Chapter 115, SubChapter D 115.354(2)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.168
4F TWC Chapter 63, SubChapter A 63.174

Description: Failure to include eleven valves and 57 connectors in VOC light liquid or gas/vapor service in the fugitive monitoring program and were not being periodically monitored as required.

Viol. Classification: Moderate

Citation: 40 CFR Chapter 63, SubChapter C, PT 63, SubPT G 63.148(d)(1)
Rqmt Prov: PERMIT SC No. 15.H.
OP ST&C No. 13(A)(i)

Description: Failure to make a repair verification after the initial repair on a valve in light liquid service was make five calendar days after the leak was detected (B-1300 Crude PO Pant).

Notice of Intent Date: 03/20/2018 (1479731)
No DOV Associated

Notice of Intent Date: 03/21/2018 (1479733)
No DOV Associated

Notice of Intent Date: 04/03/2018 (1481345)
Disclosure Date: 04/17/2018
Viol. Classification: Moderate
Citation: 40 CFR Chapter 60, SubChapter C, PT 60, SubPT A 60.7
Rqmt Prov: PERMIT SC No. 28

Description: Failure to comply with the reporting and record keeping requirements of 40 CFR § 60.7 for the CEMS on the CCR Vent Scrubber T-485 at PDH-1.

Disclosure Date: 10/04/2018

Viol. Classification: Moderate
Citation: 40 CFR Chapter 60, SubChapter C, PT 60, SubPT A 60.7
Rqmt Prov: PERMIT SC No. 28

Description: Failure to comply with the reporting and record keeping requirements of 40 CFR § 60.7 for the CEMS on the CCR Vent Scrubber T-485 at PDH-1.

Viol. Classification: Moderate
Citation: 30 TAC Chapter 117, SubChapter B 117.340(c)(3)(D)

Description: Failure to comply with the continuous demonstrate of compliance requirements of 30 TAC § 117.340(c) for the Continuous Emissions Monitoring System.

Notice of Intent Date: 04/09/2018 (1482482)
Disclosure Date: 05/25/2018
Viol. Classification: Moderate
Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
Rqmt Prov: PERMIT SC No. 21.A.

Description: Failure to analyze in a laboratory and records sampling results for caustic concentration from scrubber T-533 at least once in an eight hour period.

Disclosure Date: 09/04/2018

Viol. Classification: Moderate
Citation: 40 CFR Chapter 63, SubChapter C, PT 63, SubPT A 63.8(c)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT NNNNN 63.9005(d)

Rqmt Prov: PERMIT SC No. 21.B.

Description: Failure to ensure accurate reading of the caustic concentration from the continuous analyzer system for Scrubber No. T-532.

Notice of Intent Date: 04/09/2018 (1482493)
No DOV Associated

Notice of Intent Date: 04/09/2018 (1482512)
No DOV Associated

Notice of Intent Date: 04/09/2018 (1482533)
Disclosure Date: 05/16/2018
Viol. Classification: Moderate
Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
Rqmt Prov: OP SC No. 21
PERMIT SC No. 34, 35.D. and 36.B.

Description: Failure to maintain records of MSS activities and related VOC monitoring during plan unit turnaround.

Viol. Classification: Moderate
Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
Rqmt Prov: OP SC No. 21
PERMIT SC No. 7

Description: Failure to ensure adequate and consistent documentations for the daily Method 22 inspections on the ferric chloride filter.

Disclosure Date: 04/05/2019

Viol. Classification: Moderate
Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
Rqmt Prov: PERMIT SC No. 1
PERMIT SC No. 21

Description: Failure to comply with the MAERT limit for storage tank D-1B.

Notice of Intent Date: 04/18/2018 (1482902)

Disclosure Date: 10/25/2018

Viol. Classification: Moderate

Citation: 30 TAC Chapter 117, SubChapter B 117.303(a)(6)(D)

Description: Failure to comply with the maximum allowed operating time of 52 hours for testing and/or maintenance purposes based on a rolling 12-month average for emergency generator FIN B72L7GE01.

Viol. Classification: Moderate

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

Rqmt Prov: OP SC 3(A)(iv)(1)

Description: Failure to record visible emissions observations for emergency generator FIN F72L7GE01.

Viol. Classification: Moderate

Citation: 30 TAC Chapter 111, SubChapter A 111.111(a)(4)(A)(ii)

Description: Failed to retain documentation for flare daily observations on Flares FS-1 and FS-2.

Viol. Classification: Moderate

Citation: 30 TAC Chapter 115, SubChapter H 115.726(d)(2)

Description: Failed to retain annual HRVOC calibration documentation for the temperature and pressure monitor associated with HRVOC flares FS-1.

Viol. Classification: Moderate

Citation: 30 TAC Chapter 115, SubChapter D 115.354(11)

30 TAC Chapter 115, SubChapter D 115.354(2)

40 CFR Chapter 61, SubChapter C, PT 61, SubPT V 61.242-7(c)(1)

40 CFR Chapter 61, SubChapter C, PT 61, SubPT FF 61.349(a)(1)(i)

40 CFR Chapter 63, SubChapter C, PT 63, SubPT UU 63.1025(b)(3)(ii)

Rqmt Prov: PERMIT SC 11(F)

Description: Failure to monitor 126 piping components.

Viol. Classification: Major

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

Description: Failure to obtain authorization for added piping components.

Notice of Intent Date: 05/04/2018 (1484863)

No DOV Associated

Notice of Intent Date: 05/07/2018 (1486186)

Disclosure Date: 11/28/2018

Viol. Classification: Moderate

Citation: 40 CFR Chapter 60, SubChapter C, PT 60, SubPT A 60.18

Rqmt Prov: PERMIT SC NOs. 8A & 8B

OP Title V Permit O2203

Description: Failure to maintain compliance with the BTU heating value requirements of 40 CFR 60.18 for one hour for Flare FS-801.

Notice of Intent Date: 05/10/2018 (1486194)

Disclosure Date: 06/21/2018

Viol. Classification: Moderate

Citation: 30 TAC Chapter 115, SubChapter D 115.356(3)(C)

30 TAC Chapter 116, SubChapter B 116.115(c)

40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.162(c)

Rqmt Prov: OP SC No. 18

PERMIT SC Nos. 3 and 5.A.

Description: Failure to maintain documentation of equipment in the Phenol Glycol Ether facility that are excluded from the LDAR and HON MACT requirements.

Disclosure Date: 10/30/2018

Viol. Classification: Moderate

Citation: 30 TAC Chapter 115, SubChapter D 115.352(6)

30 TAC Chapter 115, SubChapter D 115.352(8)

30 TAC Chapter 115, SubChapter D 115.354(1)

30 TAC Chapter 115, SubChapter D 115.354(11)

30 TAC Chapter 115, SubChapter D 115.354(12)

40 CFR Part 63, Subpart H 63.168

40 CFR Part 63, Subpart H 63.174

Rqmt Prov: OP SC 18

PERMIT SC Nos. 3, 5, 6, & 8

Description: Failure to monitor three connectors in light liquid service as required.

Viol. Classification: Moderate

Citation: 30 TAC Chapter 115, SubChapter D 115.352(6)
30 TAC Chapter 115, SubChapter D 115.352(8)
30 TAC Chapter 115, SubChapter D 115.354(11)
30 TAC Chapter 115, SubChapter D 115.354(12)
40 CFR Part 63, Subpart H 63.168
40 CFR Part 63, Subpart H 63.174

Rqmt Prov: PERMIT SC 18

PERMIT SC 3, 5, & 6

Description: Failure to monitor 57 connectors and eight valves in light liquid service as required.

Viol. Classification: Moderate

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

Rqmt Prov: PERMIT SC 10
OP SC 21

Description: Failure to equip one relief valve in VOC service with a rupture disc and pressure transmitter upstream as required.

Disclosure Date: 12/10/2018

Viol. Classification: Moderate

Citation: 30 TAC Chapter 115, SubChapter D 115.352(6)
30 TAC Chapter 115, SubChapter D 115.352(8)
30 TAC Chapter 115, SubChapter D 115.354(11)
30 TAC Chapter 115, SubChapter D 115.354(12)
4F TWC Chapter 63, SubChapter A 63.168
40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.174

Description: Failure to monitor six connectors in light liquid service as required.

Notice of Intent Date: 06/07/2018 (1497999)

Disclosure Date: 10/17/2018

Viol. Classification: Moderate

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

Rqmt Prov: PERMIT SC No. 11

Description: Failure to maintain annual calibration records for the flow, temperature and pressure instruments on the H-310, H-320, H-330 and H-340 heaters.

Viol. Classification: Moderate

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

Rqmt Prov: PERMIT SC No. 24.C.

Description: Failure to conduct annual calibration for the T-485 Vent Scrubber liquid recycle flow monitoring device.

Notice of Intent Date: 06/08/2018 (1498007)

Disclosure Date: 10/25/2018

Viol. Classification: Moderate

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

Rqmt Prov: PERMIT SC No. 4(c)(2)

Description: Failure to perform and document functionality tests on each MSS LEL detector within 24 hours of use with a certified gas standard at 25% of the LEL for pentane.

Viol. Classification: Moderate

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

Rqmt Prov: PERMIT SC No. 4(C)(2)

Description: Failed to complete functionality test for LEL monitor used for MSS to greater than 90% of the calibration gas certified value.

Viol. Classification: Minor

Citation: 40 CFR Chapter 61, SubChapter C, PT 61, SubPT FF 61.357(d)(7)(ii)

Description: Failure to include two hours of an excursion in the Benzene Waste Operations NESHAP quarterly report for the second quarter of 2018.

Viol. Classification: Moderate

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

Description: Failure to authorize a change in service of existing piping that triggered the components to be subject to LDAR under Reg V HRVOC.

Notice of Intent Date: 06/05/2018 (1498040)

No DOV Associated

Notice of Intent Date: 06/14/2018 (1500224)

Disclosure Date: 08/06/2018

Viol. Classification: Moderate
Citation: 30 TAC Chapter 115, SubChapter D 115.354
30 TAC Chapter 115, SubChapter H 115.781
30 TAC Chapter 116, SubChapter B 116.115(c)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT UU 63.1025
Rqmt Prov: PERMIT SC No. 11.F.
PERMIT SC No. 12.A.
Description: Failure to monitor two valves as required and four connectors were not periodically monitored as required.

Notice of Intent Date: 06/12/2018 (1532451)
Disclosure Date: 12/06/2018
Viol. Classification: Moderate
Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
Rqmt Prov: PERMIT NSR Permit
OP Title V Permit
Description: Failure to ensure that correct emissions factors are utilized in process control.

Notice of Intent Date: 06/19/2018 (1500080)
Disclosure Date: 10/22/2018
Viol. Classification: Moderate
Citation: 40 CFR Chapter 63, SubChapter C, PT 63, SubPT ZZZZ 63.6640(f)(2)
Description: Failure to document the operating start and stop time during the opacity check for B33 Emergency engine/Title V ID#B33INGEAUX.
Viol. Classification: Minor
Citation: 40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.182(c)(1)(II)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.182(c)(1)(III)
Description: Failure to correctly identify applicability of leak provisions in the NOCs for HON. Specifically, it is incorrectly stated that the equipment leak provisions apply to the wastewater treatment and stripper areas in B35.
Viol. Classification: Moderate
Citation: 30 TAC Chapter 115, SubChapter H 115.781(c)(1)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.173(d)(4)
Description: Failure to conduct weekly visual inspections for leaks from the five agitators in the tank farm area of the B33 Kiln facility.
Viol. Classification: Moderate
Citation: 30 TAC Chapter 117, SubChapter B 117.340(p)(2)(A)
Description: Failure to conduct a performance test after Environmental Operations modified the operation of the Flameless Thermal Oxidizer Plant increasing NOx emissions.
Viol. Classification: Moderate
Citation: 30 TAC Chapter 101, SubChapter A 101.10
Rqmt Prov: OP ST&C 2.E.
Description: Failure to ensure that emissions factors used for the Annual Emissions Inventory for some environmental operations were incorrectly calculated.
Disclosure Date: 04/22/2019
Viol. Classification: Moderate
Citation: 30 TAC Chapter 115, SubChapter D 115.354(2)(C)
Rqmt Prov: PERMIT SC 15
OP ST&Cs
Description: Failure to conduct Method 21 monitoring on 1 out of 174 valves at the FTO Plant.
Viol. Classification: Minor
Citation: 30 TAC Chapter 115, SubChapter D 115.354(2)(C)
Rqmt Prov: PERMIT SC 16 and 18
OP ST&Cs
Description: Failure to perform Method 21 monitoring on 12 out of 1,348 connectors and 3 out of 440 valves at the TO Plant.
Viol. Classification: Minor
Citation: 30 TAC Chapter 115, SubChapter D 115.354(2)(C)
Rqmt Prov: PERMIT Section (X)(B)(2)
OP ST&Cs
Description: Failure to conducted Method 21 monitoring on 9 out of 962 valves and 39 out of 3,517 connectors at the KILN.
Viol. Classification: Minor
Citation: 4F TWC Chapter 63, SubChapter A 63.168(b)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.174(b)
Rqmt Prov: PERMIT ST&Cs
Description: Failure to conduct required Method 21 monitoring on two valves and 23 connectors at the B35 Throx.

Notice of Intent Date: 06/28/2018 (1504235)

Disclosure Date: 07/12/2018

Viol. Classification: Moderate

Citation: 30 TAC Chapter 101, SubChapter F 101.201

Description: Failure to ensure that incident notification are submitted under a valid STEERS account. Specifically, initial incident notifications were submitted under a STEERS account that was in "probationary" status.

Notice of Intent Date: 07/12/2018 (1505768)

Disclosure Date: 06/12/2019

Viol. Classification: Moderate

Citation: 30 TAC Chapter 335, SubChapter A 335.10(c)

30 TAC Chapter 335, SubChapter A 335.13(i)

30 TAC Chapter 335, SubChapter A 335.4

30 TAC Chapter 335, SubChapter A 335.6(c)

30 TAC Chapter 335, SubChapter A 335.9

Description: Failure to comply with solid waste requirements for non-hazardous spent carbon destined for regeneration and treated in a thermal treatment carbon regeneration unit.

Notice of Intent Date: 07/16/2018 (1505758)

No DOV Associated

Notice of Intent Date: 07/16/2018 (1506963)

Disclosure Date: 09/19/2018

Viol. Classification: Moderate

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

30 TAC Chapter 122, SubChapter B 122.143(4)

Rqmt Prov: OP SC 15

PERMIT SC 6

Description: Failure to maintain records of quarterly visible emissions observations.

Viol. Classification: Minor

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

Rqmt Prov: OP SC 15

Description: Failure to have monitoring, recordkeeping, and/or inspection for the quarterly HRVOC pressure transmitter inspection for the second quarter of 2018.

Disclosure Date: 03/19/2019

Viol. Classification: Moderate

Citation: 40 CFR Chapter 61, SubChapter C, PT 61, SubPT FF 61.342(f)(1)

40 CFR Chapter 61, SubChapter C, PT 61, SubPT FF 61.342(f)(2)

Rqmt Prov: OP Permit Representations

Description: Failure to ensure that material shipped from distillate tank is correctly identified in the Title V permit. Specifically, the material is incorrectly identified as being subject to NESHAP FF.

Viol. Classification: Moderate

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

Rqmt Prov: OP SC 15

PERMIT SC 16 and 23

Description: Failure to ensure that the stationary combustion turbine (B56P9GT96) is not incorrectly identified as being subject to fuel sampling requirements pursuant to 40 CFR Part 60, Subpart KKKK.

Viol. Classification: Moderate

Citation: 30 TAC Chapter 106, SubChapter K 106.261(a)(7)(A)

30 TAC Chapter 106, SubChapter K 106.262(a)(2)

Rqmt Prov: OP ST&C 16

Description: Failure to obtain permit by rule authorization for the installation of fugitive components in distillate service.

Viol. Classification: Moderate

Citation: 30 TAC Chapter 101, SubChapter A 101.10

Rqmt Prov: OP ST&C 2.E.

Description: Failure to submit an annual emissions inventory for the OSBL Corridor B fugitive areas.

Notice of Intent Date: 07/31/2018 (1511522)

Disclosure Date: 04/23/2019

Viol. Classification: Moderate

Citation: 30 TAC Chapter 106, SubChapter D 106.124

Rqmt Prov: OP ST&Cs

Description: Failure to ensure that the flare used as an alternate control device and associated emissions are considered in the PBR 106.124 evaluation and documentation for B-4060 EOEG Show Tube Pilot Plant.

Viol. Classification: Minor
Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
Rqmt Prov: PERMIT SCs
OP ST&Cs

Description: Failure to include 2 relief valves, 15 valves, and 50 connectors in VOC light liquid and gas/vapor service in the fugitive monitoring program and were not periodically monitored as required.

Notice of Intent Date: 08/01/2018 (1511536)
Disclosure Date: 10/18/2018
Viol. Classification: Minor
Citation: 40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.163(b)(3)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.163(e)(4)

Description: Failure to record the weekly visual inspection of 5 pumps in light liquid service for indication of leaks.
Viol. Classification: Moderate
Citation: 30 TAC Chapter 115, SubChapter H 115.725(d)(1)
Rqmt Prov: PERMIT SC NO. 9.C.

Description: Failure to perform timely calibration of the Furnace Flow Meters FT-5575-06 and FT-5575-08.
Disclosure Date: 01/15/2019
Viol. Classification: Moderate
Citation: 40 CFR Chapter 63, SubChapter C, PT 63, SubPT SS 63.998(b)(6)(i)

Description: Failure to comply with the daily average limit for the F-6510 furnace minimum firebox temperature.
Disclosure Date: 02/21/2019
Viol. Classification: Moderate
Citation: 40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.163(b)(3)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.163(e)(4)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.181(c)

Description: Failure to perform weekly visual inspections pumps and seals on the correct dates due to task scheduling inadvertently allowed exceedance of weekly inspection by a day.
Viol. Classification: Moderate
Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
Rqmt Prov: PERMIT SC No. 18.E
PERMIT SC No. 19.E

Description: Failure to perform weekly AVO visual inspection flange and connectors on the correct dates due to task scheduling inadvertently allowed exceedance of weekly inspection by a day.
Viol. Classification: Moderate
Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
Rqmt Prov: PERMIT SC No. 11.A and 11.C

Description: Failure to prevent visible PM emissions from the material handling railcar talc system.
Viol. Classification: Moderate
Citation: 30 TAC Chapter 115, SubChapter D 115.352(1)(A)
30 TAC Chapter 115, SubChapter D 115.354(11)
30 TAC Chapter 115, SubChapter D 115.354(2)
4F TWC Chapter 63, SubChapter A 63.168(c)
Rqmt Prov: PERMIT SC NOs. 19 and 18.F

Description: Failure to conduct fugitive monitoring of 16 valves and 68 connectors.

Notice of Intent Date: 08/15/2018 (1513160)
Disclosure Date: 01/16/2019
Viol. Classification: Moderate
Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
Rqmt Prov: PERMIT Permit Representations

Description: Failure to comply with permit representations during HRVOC performance testing which indicated that Train 1 exceeded hourly production rates and VOC emission limits for the spin dryer (EPN B41SP1) and the hold up hopper (EPN B41V1).
Viol. Classification: Moderate
Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
Rqmt Prov: PERMIT Special Condition No. 12

Description: Failure to ensure that the trains are operating with either the Regenerative Thermal Oxidizer (EPN B41CO1) or the Permanent Thermal Oxidizer (EPN B41P4TO365) controlling the vents from the check hopper and blending silos which resulted in an excess of 58 pounds of ethylene.
Viol. Classification: Moderate
Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
Rqmt Prov: PERMIT SC No. 27

Description: Failure to maintain records to demonstrate compliance with permitted emission limits for the Regenerative Thermal Oxidizer (EPN B41CO1).

Disclosure Date: 07/18/2019
 Viol. Classification: Moderate
 Citation: 30 TAC Chapter 101, SubChapter F 101.201(a)(1)(B)
 Description: Failure to timely report opacity events and recording of VOC, PM and ethylene permit exceedance events.
 Viol. Classification: Moderate
 Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
 Rqmt Prov: PERMIT SCs 27 and 29
 Description: Failure to ensure that the Regenerative Thermal Oxidizer's firebox temperature are operating at the set point temperature of 1502 F established by the initial stack test during normal operations.

Notice of Intent Date: 08/16/2018 (1513165)
 Disclosure Date: 10/18/2018
 Viol. Classification: Moderate
 Citation: 30 TAC Chapter 117, SubChapter B 117.335(c)
 Rqmt Prov: PERMIT SC 19(E)
 Description: Failure to conduct a Relative Accuracy Test Audit on the NOx, CO and O2 Continuous Emissions monitoring System analyzer that was replaced on September 6, 2018 on the PDH-1, H-310 Furnace EPN# OC4H310.
 Viol. Classification: Moderate
 Citation: 30 TAC Chapter 117, SubChapter B 117.335(c)
 Rqmt Prov: PERMIT SC No. 28(F)
 Description: Failure to conduct a Relative Accuracy Test Audit on the NOx and CO Continuous Emissions Monitoring System analyzer that was replaced on July 9, 2013 on the LHC-8 Furnace #5 EPN#OC6S5 and Furnace #6 EPN# OC6S6.

Notice of Intent Date: 08/16/2018 (1513170)
 Disclosure Date: 03/13/2019
 Viol. Classification: Minor
 Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
 Rqmt Prov: PERMIT SC 10.E & 10.K.
 Description: Failure to document the AVO inspection for the week of 8/26/18.

Notice of Intent Date: 08/31/2018 (1518181)
 Disclosure Date: 11/12/2018
 Viol. Classification: Moderate
 Citation: 30 TAC Chapter 115, SubChapter H 115.722(d)
 30 TAC Chapter 116, SubChapter B 116.110(a)(1)
 40 CFR Chapter 61, SubChapter C, PT 61, SubPT I 61.112(a)
 40 CFR Chapter 63, SubChapter C, PT 63, SubPT G 63.112(b)
 Rqmt Prov: OP Title V Permit
 Description: Failure to obtain authorization for all fugitive components. Specifically, unauthorized fugitive components were discovered.

Notice of Intent Date: 09/28/2018 (1523538)
 No DOV Associated

Notice of Intent Date: 09/28/2018 (1523545)
 No DOV Associated

Notice of Intent Date: 09/28/2018 (1523547)
 No DOV Associated

Notice of Intent Date: 10/31/2018 (1530651)
 Disclosure Date: 04/17/2019
 Viol. Classification: Moderate
 Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
 Rqmt Prov: PERMIT SC 1
 Description: Failure to calculate air emissions monthly and hourly to determine compliance with permit requirements.
 Viol. Classification: Minor
 Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
 Rqmt Prov: PERMIT SC 13(A)(2)
 Description: Failed to perform annual Leak Detection and Repair monitoring on all of the closed vent system components (99 connectors).
 Viol. Classification: Minor
 Citation: 30 TAC Chapter 115, SubChapter H 115.781(b)
 30 TAC Chapter 116, SubChapter B 116.115(c)

Rqmt Prov: PERMIT SC 5(E)
Description: Failure to perform leak detection and repair monitoring of 72 valves and 159 connectors.

Notice of Intent Date: 11/09/2018 (1532619)
No DOV Associated

Notice of Intent Date: 11/19/2018 (1532630)
No DOV Associated

Notice of Intent Date: 11/19/2018 (1532745)
No DOV Associated

Notice of Intent Date: 11/26/2018 (1537182)
Disclosure Date: 04/29/2019
Viol. Classification: Minor
Citation: 30 TAC Chapter 115, SubChapter D 115.352(4)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.167
Rqmt Prov: PERMIT SC 8.E.
Description: Failure to prevent three open-ended lines in the process area.
Viol. Classification: Moderate
Citation: 30 TAC Chapter 122, SubChapter B 122.143(4)
Rqmt Prov: OP SC 3.A(iii)(1)
Description: Failure to ensure that the process heaters are in operation at the time visible observations are conducted
(OC4H310, OC4H230, OC4H330, OC4H340).
Viol. Classification: Minor
Citation: 30 TAC Chapter 122, SubChapter B 122.143(4)
Rqmt Prov: OP SC 3.A(iii)(1)
Description: Failure to include four emissions point in the quarterly visible emissions observations.
Viol. Classification: Moderate
Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
Rqmt Prov: PERMIT SC No. 1
Description: Failure to comply with the hourly permit limit for catalyst emissions.
Viol. Classification: Minor
Citation: 30 TAC Chapter 115, SubChapter D 115.354(3)
30 TAC Chapter 116, SubChapter B 116.115(c)
Rqmt Prov: PERMIT SCs 8.E. & 8.L.
Description: Failure to maintain records of weekly AVO inspections for connector in heavy liquid service for the second
quarter of 2017.
Disclosure Date: 10/23/2019
Viol. Classification: Moderate
Citation: 40 CFR Chapter 273, SubChapter I, PT 273, SubPT B 273.15(c)
Description: Failure to ensure two pallets of non-hazardous waste are stored in a registered storage area.
Viol. Classification: Moderate
Citation: 40 CFR Chapter 273, SubChapter I, PT 273, SubPT B 273.14(e)
Description: Failure to label a box containing used lamps as universal waste.
Viol. Classification: Minor
Citation: 30 TAC Chapter 111, SubChapter A 111.111(a)(1)(B)
Rqmt Prov: OP SC 3.A(iii)(1)
Description: Failure to maintain records to demonstrate that quarterly visible emissions observations were performed for
the first quarter of 2017 (emission points for catalyst and diesel generators).

Notice of Intent Date: 11/30/2018 (1537187)
No DOV Associated

Notice of Intent Date: 12/03/2018 (1537149)
Disclosure Date: 05/14/2019
Viol. Classification: Moderate
Citation: 40 CFR Chapter 63, SubChapter C, PT 63, SubPT G 63.152(c)(2)(ii)(A)(3)
Rqmt Prov: PERMIT SC No. 17.A
OP SC No. 21
Description: Failure to ensure that rundown temperature transmitters are connected and reading accurately during the
startup of the Glycol B control technique header.

Notice of Intent Date: 01/23/2019 (1548452)

Disclosure Date: 05/15/2019

Viol. Classification: Moderate

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

Rqmt Prov: PERMIT SC No. 24

OP ST&Cs

Description: Failure to comply with the 10 ppmv NH3 limit from the furnace downstream from the SCR.

Disclosure Date: 08/21/2019

Viol. Classification: Moderate

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

Rqmt Prov: PERMIT SC 25.D

OP ST&Cs

Description: Failure to ensure that the NH3 analyzer produces accurate data.

Notice of Intent Date: 02/01/2019 (1549389)

Disclosure Date: 07/24/2019

Viol. Classification: Moderate

Citation: 40 CFR Chapter 63, SubChapter C, PT 63, SubPT A 63.9(h)(2)(i)

Rqmt Prov: PERMIT Table 12 Subpart EEEE

Description: Failure to maintain a record of a post marked submitted NOCS incorporating changes in applicability to storage tank T-4010 and related control device.

Notice of Intent Date: 01/31/2019 (1550613)

No DOV Associated

Notice of Intent Date: 01/31/2019 (1550614)

No DOV Associated

Notice of Intent Date: 02/04/2019 (1549378)

Disclosure Date: 04/08/2019

Viol. Classification: Major

Citation: 30 TAC Chapter 106, SubChapter K 106.261(a)(7)(A)

30 TAC Chapter 116, SubChapter B 116.110(a)(1)

30 TAC Chapter 116, SubChapter B 116.110(a)(4)

Rqmt Prov: PERMIT SCs

Description: Project was installed prior to PBR approval.

Viol. Classification: Moderate

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

Rqmt Prov: PERMIT SC No. 15.D

Description: Failure to conduct quarterly sampling for total dissolved solids on three cooling towers (B27CT01, B27CT02, B27CT03).

Viol. Classification: Moderate

Citation: 30 TAC Chapter 122, SubChapter B 122.143(3)

Rqmt Prov: PERMIT SC 3B(iii)(3)

Description: Failure to ensure that visible emissions observations for the furnaces (B27S523, B27S521, B27S503, B27S511) and the flare (B27F1) are conducting within the Title V permit time requirements.

Viol. Classification: Moderate

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

Rqmt Prov: PERMIT SC 3

PERMIT ST&Cs

Description: Failure to maintain complete documentation for fourteen monthly NSPS DDD inspection records of the valve that can divert the vent stream from the CVS to the atmosphere (B27P3FU1).

Viol. Classification: Minor

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

Rqmt Prov: OP SC 14

PERMIT SC 21.A

Description: Failure to complete four HCL AVO inspections and two weekly AVO inspection of connectors and flanges (B27P3FU1, B27P3FU2, B27P3FU3).

Notice of Intent Date: 02/19/2019 (1550618)

No DOV Associated

Notice of Intent Date: 02/20/2019 (1551519)

No DOV Associated

Notice of Intent Date: 02/19/2019 (1551527)

Disclosure Date: 04/01/2019

Viol. Classification: Moderate

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

Rqmt Prov: PERMIT SC No. 14.C.

OP ST&Cs

Description: Failure to ensure that the THROX (EPN: B44S100) and TOX (EPN: B44S200) stack flow monitoring devices are reading incorrectly.

Disclosure Date: 05/17/2019

Viol. Classification: Moderate

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

Rqmt Prov: PERMIT SC No. 20

OP ST&Cs

Description: Failure to comply with the 248 degree F temperature limit for Tank D-355.

Viol. Classification: Minor

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

Rqmt Prov: PERMIT SC No. 16

OP ST&Cs

Description: Failure to monitor five connectors periodically as required.

Disclosure Date: 07/29/2019

Viol. Classification: Moderate

Citation: 30 TAC Chapter 115, SubChapter D 115.354(2)(C)

30 TAC Chapter 116, SubChapter B 116.115(c)

40 CFR Part 63, Subpart H 63.168

Rqmt Prov: PERMIT SC 16

OP STCs

Description: Failure to conduct fugitive monitoring of ninety valves due to a reactor shutdown.

Viol. Classification: Moderate

Citation: 30 TAC Chapter 115, SubChapter D 115.354(2)(C)

30 TAC Chapter 116, SubChapter B 116.115(c)

40 CFR Part 63, Subpart H 63.168

40 CFR Part 63, Subpart H 63.174

Rqmt Prov: OP GTC

PERMIT SC 16

Description: Failure to conduct periodic monitoring of five valves and fourteen connectors.

Notice of Intent Date: 02/21/2019 (1551538)

No DOV Associated

Notice of Intent Date: 02/28/2019 (1552200)

Disclosure Date: 05/15/2019

Viol. Classification: Minor

Citation: 40 CFR Chapter 61, SubChapter C, PT 61, SubPT FF 61.349(f)

Rqmt Prov: OP ST&Cs

Description: Failure to conduct one quarterly inspection for the closed vent system.

Viol. Classification: Minor

Citation: 40 CFR Part 63, Subpart H 63.168

40 CFR Part 63, Subpart H 63.174

Rqmt Prov: PERMIT SC No. 14

OP ST&Cs

Description: Failure to monitor two valves and three connectors periodically as required.

Notice of Intent Date: 02/26/2019 (1552219)

No DOV Associated

Notice of Intent Date: 03/04/2019 (1570843)

Disclosure Date: 06/25/2019

Viol. Classification: Minor

Citation: 40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.163(b)(3)

Rqmt Prov: PERMIT SC 1.E

PERMIT SC 18

PERMIT SC 3 and 5.E

Description: Failure to maintain one AVO inspections record as required.

Viol. Classification: Minor
 Citation: 40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.163(b)(3)
 40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.173(b)(1)
 Rqmt Prov: PERMIT SC 1.E and 18
 PERMIT SC 6.E
 Description: Failure to maintain one AVO inspections record as required.

Viol. Classification: Minor
 Citation: 40 CFR Chapter 265, SubChapter I, PT 265, SubPT I 265.174
 30 TAC Chapter 335, SubChapter C 335.69(a)(1)(A)
 Description: Failure to complete weekly inspections of <90 day hazardous waste container storage area or completed late for the weeks of February 3, 2019 and March 3, 2019.

Viol. Classification: Moderate
 Citation: 30 TAC Chapter 115, SubChapter E 115.468(b)(2)
 Rqmt Prov: PERMIT Permit Conditions
 OP SC 15
 Description: Failure to ensure that cans of solvents located in the storage cabinets are in compliance with Texas Reg 5 Industrial Cleaning Solvents requirements.

Disclosure Date: 08/15/2019
 Viol. Classification: Minor
 Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
 Rqmt Prov: OP SC 18
 PERMIT SC 6.E
 Description: Failure to conduct fugitive monitoring on a connector within 15 days of being put into service.

Notice of Intent Date: 03/21/2019 (1554128)
 Disclosure Date: 08/26/2019
 Viol. Classification: Moderate
 Citation: 30 TAC Chapter 101, SubChapter F 101.201(b)
 Description: Failure to create a final record for a recordable emissions event within two weeks after the event on January 25, 2019.

Notice of Intent Date: 03/21/2019 (1554138)
 Disclosure Date: 06/06/2019
 Viol. Classification: Moderate
 Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
 Rqmt Prov: PERMIT SC 11A and 11C
 Description: Failure to prevent visible PM emissions from the vent collection system (B93BH6990) while performing a voluntary test to load two talced product railcars after vent collection system piping improvements were implemented.

Viol. Classification: Moderate
 Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
 Rqmt Prov: PERMIT SC 11E
 Description: Failure to comply with the pressure differential transmitter limit of 25 mbar on Railcar Loading Filter FL-6990A during a voluntary test.

Viol. Classification: Moderate
 Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
 Rqmt Prov: PERMIT MAERT
 Description: Failure to comply with the hourly PM emissions rate by 0.26 lbs/hr at the Railcar Loading Filters FL-6990A and FL-6990B.

Notice of Intent Date: 03/28/2019 (1555704)
 Disclosure Date: 08/15/2019
 Viol. Classification: Moderate
 Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
 Rqmt Prov: OP SC 13
 PERMIT SC 2
 Description: Failure to include emissions associated with a boiler startup in the rolling twelve month MSS emissions total.

Viol. Classification: Moderate
 Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
 Rqmt Prov: OP SC 13
 PERMIT SC 4
 Description: Failure to accurately monitor the drain fill rate to demonstrate compliance with permit requirements for two tanks.

Notice of Intent Date: 03/28/2019 (1555719)
No DOV Associated

Notice of Intent Date: 04/05/2019 (1555714)
No DOV Associated

Notice of Intent Date: 04/01/2019 (1555734)
Disclosure Date: 09/30/2019

Viol. Classification: Moderate

Citation: 40 CFR Chapter 61, SubChapter C, PT 61, SubPT FF 61.343(a)(1)(i)(B)

Description: Failure to prevent two open ended lines on components in Benzene Waste NESHAP service.

Notice of Intent Date: 04/15/2019 (1557935)
No DOV Associated

Notice of Intent Date: 04/25/2019 (1558262)
No DOV Associated

Notice of Intent Date: 04/22/2019 (1570690)
No DOV Associated

Notice of Intent Date: 04/30/2019 (1558544)
No DOV Associated

Notice of Intent Date: 05/03/2019 (1569139)
No DOV Associated

Notice of Intent Date: 05/14/2019 (1570069)
No DOV Associated

Notice of Intent Date: 05/20/2019 (1571011)
No DOV Associated

Notice of Intent Date: 05/22/2019 (1571609)
No DOV Associated

Notice of Intent Date: 06/17/2019 (1578811)
No DOV Associated

Notice of Intent Date: 07/12/2019 (1581334)
No DOV Associated

Notice of Intent Date: 07/18/2019 (1580565)
No DOV Associated

Notice of Intent Date: 07/18/2019 (1582116)
No DOV Associated

Notice of Intent Date: 07/26/2019 (1589610)
No DOV Associated

Notice of Intent Date: 07/25/2019 (1589681)
No DOV Associated

Notice of Intent Date: 08/01/2019 (1590511)
No DOV Associated

Notice of Intent Date: 07/29/2019 (1590525)
No DOV Associated

Notice of Intent Date: 08/07/2019 (1590512)
No DOV Associated

Notice of Intent Date: 08/12/2019 (1591210)
No DOV Associated

Notice of Intent Date: 08/20/2019 (1592517)

No DOV Associated

Notice of Intent Date: 08/27/2019 (1596810)

No DOV Associated

Notice of Intent Date: 09/06/2019 (1597704)

No DOV Associated

Notice of Intent Date: 09/13/2019 (1598357)

No DOV Associated

Notice of Intent Date: 09/12/2019 (1598371)

No DOV Associated

Notice of Intent Date: 09/10/2019 (1598379)

No DOV Associated

Notice of Intent Date: 09/17/2019 (1602909)

No DOV Associated

Notice of Intent Date: 10/14/2019 (1605797)

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

Addendum to Compliance History Federal Enforcement Actions

Reg Entity Name: DOW CHEMICAL CO FREEPORT FACILITY

Reg Entity Add: 2301 N BRAZOSPORT BLVD

Reg Entity City: FREEPORT

Reg Entity No: RN100225945

EPA Case No: 06-2018-0935

Order Issue Date (yyyymmdd): 20180920

Case Result: Final Order With Penalty

Statute: RCRA

Sect of Statute: 3008A

Classification: Minor

Program: Solid Waste Managemen

Citation:

Violation Type:

Cite Sect:

Cite Part:

Enforcement Action: Administrative Penalty Order With or Without Inj

TEXAS COMMISSION ON ENVIRONMENTAL QUALITY



IN THE MATTER OF AN
ENFORCEMENT ACTION
CONCERNING
THE DOW CHEMICAL COMPANY
RN100225945

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§

BEFORE THE

TEXAS COMMISSION ON

ENVIRONMENTAL QUALITY

AGREED ORDER DOCKET NO. 2019-1485-IWD-E

I. JURISDICTION AND STIPULATIONS

On _____, the Texas Commission on Environmental Quality ("the Commission" or "TCEQ") considered this agreement of the parties, resolving an enforcement action regarding The Dow Chemical Company (the "Respondent") under the authority of TEX. WATER CODE chs. 7 and 26. The Executive Director of the TCEQ, through the Enforcement Division, and the Respondent together stipulate that:

1. The Respondent owns and operates an industrial chemical manufacturing plant located at 2301 North Brazosport Boulevard, north of the City of Freeport in Brazoria County, Texas (the "Facility"). The Facility is near or adjacent to water in the state as defined in TEX. WATER CODE § 26.001(5).
2. The Executive Director and the Respondent agree that the TCEQ has jurisdiction to enter this Order pursuant to TEX. WATER CODE §§ 7.002, 7.051, and 7.073, and that the Respondent is subject to TCEQ's jurisdiction. The TCEQ has jurisdiction in this matter pursuant to TEX. WATER CODE § 5.013 because it alleges violations of TEX. WATER CODE ch. 26 and the rules of the TCEQ.
3. The occurrence of any violation is in dispute and the entry of this Order shall not constitute an admission by the Respondent of any violation alleged in Section II ("Allegations"), nor of any statute or rule.
4. An administrative penalty in the amount of \$28,350 is assessed by the Commission in settlement of the violations alleged in Section II ("Allegations"). The Respondent paid \$11,340 of the penalty and \$5,670 of the penalty is deferred contingent upon the Respondent's timely and satisfactory compliance with all the terms of this Order and shall be waived only upon full compliance with all the terms and conditions of this Order. If the Respondent fails to timely and satisfactorily comply with any of the terms and conditions contained in this Order, the Executive Director may demand payment of all or part of the deferred penalty amount.

Pursuant to TEX. WATER CODE § 7.067, \$11,340 of the penalty shall be conditionally offset by the Respondent's timely and satisfactory completion of a Supplemental Environmental Project ("SEP") as defined in the attached SEP Agreement ("Attachment

A", incorporated herein by reference). The Respondent's obligation to pay the conditionally offset portion of the penalty shall be discharged upon full compliance with all the terms and conditions of this Order, which includes the timely and satisfactory completion of all provisions of the SEP Agreement, as determined by the Executive Director.

5. The Executive Director and the Respondent agree on a settlement of the matters alleged in this enforcement action, subject to final approval in accordance with 30 TEX. ADMIN. CODE § 70.10(a). 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.
6. 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 Order.
7. This Order represents the complete and fully-integrated agreement of the parties. The provisions of this Order are deemed severable and, if a court of competent jurisdiction or other appropriate authority deems any provision of this Order unenforceable, the remaining provisions shall be valid and enforceable.
8. This Order shall terminate five years from its effective date or upon compliance with all the terms and conditions set forth in this Order, whichever is later.

II. ALLEGATIONS

During a record review conducted on August 19, 2019, an investigator documented that the Respondent failed to comply with permitted effluent limitations, in violation of 30 TEX. ADMIN. CODE § 305.125(1), TEX. WATER CODE § 26.121(a)(1), and Texas Pollutant Discharge Elimination System ("TPDES") Permit No. WQ0000007000, Outfall No. 002, Effluent Limitations and Monitoring Requirements ("ELMR") No. 1; Outfall No. 004, ELMR No. 2; Outfall No. 301, ELMR No. 1; Outfall No. 501, ELMR No. 1; and Outfall No. 701, ELMR No. 1, as shown in the effluent violation table below:

	Outfall 002		Outfall 004	Outfall 301	Outfall 501	Outfall 701
	Total Copper Daily Average Concentration	Total Copper Daily Maximum Concentration	pH Maximum	Total Purgeable Halocarbons Daily Maximum Loading	Total Purgeable Halocarbons Daily Maximum Concentration*	Total Suspended Solids Daily Maximum Loading
Monitoring Period	Limit = 5.86 µg/L	Limit = 12.4 µg/L	Limit = 9 SU	Limit = 2 lbs/day	Limit = 0.1 mg/L	Limit = 3,580 lbs/day
September 2018	c	c	c	12	c	6,776
December 2018	8.96	16.5	c	c	c	c
January 2019	c	14.0	c	c	n/a	c
March 2019	c	c	c	c	0.2	c
May 2019	c	14.9	c	c	n/a	c
June 2019	c	c	9.2	c	0.2	5,022

µg/L = micrograms per liter
n/a = not applicable
mg/L milligrams per liter

lbs/day = pounds per day
* = frequency of once per quarter

SU = standard units
c = compliant

III. DENIALS

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

IV. ORDERING PROVISIONS

NOW, THEREFORE, THE TEXAS COMMISSION ON ENVIRONMENTAL QUALITY ORDERS that:

1. The Respondent is assessed a penalty as set forth in Section I, Paragraph No. 4. The payment of this penalty and the Respondent's compliance with all of the requirements set forth in this Order resolve only the allegations in Section II. The Commission shall not be constrained in any manner from requiring corrective action or penalties for violations which are not raised here. Penalty payments shall be made payable to "TCEQ" and shall be sent with the notation "Re: The Dow Chemical Company, Docket No. 2019-1485-IWD-E" to:

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

2. The Respondent shall implement and complete a SEP as set forth in Section I, Paragraph No. 4. The amount of \$11,340 of the assessed penalty is conditionally offset based on the Respondent's implementation and completion of the SEP pursuant to the terms of the SEP Agreement, as defined in Attachment A. Penalty payments for any portion of the SEP deemed by the Executive Director as not complete shall be paid within 30 days after the date the Executive Director demands payment.

3. The Respondent shall, within 130 days after the effective date of this Order, submit written certification of compliance with the permitted effluent limitations of TPDES Permit No. WQ0000007000, including specific corrective actions that were implemented at the Facility to achieve compliance and copies of the most current self-reported discharge monitoring reports, demonstrating at least three consecutive months of compliance with all permitted effluent limitations, and include detailed supporting documentation including photographs, receipts, and/or other records to demonstrate compliance. The certification shall be signed by the Respondent and shall include the following certification 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:

Water Section Manager
Houston Regional Office
Texas Commission on Environmental Quality
5425 Polk Street, Suite H
Houston, Texas 77023-1452

4. All relief not expressly granted in this Order is denied.
5. The duties and provisions imposed by this Order shall apply to and be binding upon the Respondent. The Respondent is ordered to give notice of this Order to personnel who maintain day-to-day control over the Facility operations referenced in this Order.
6. If the Respondent fails to comply with any of the Ordering Provisions in this 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 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.

7. The Executive Director may grant an extension of any deadline in this Order or in any plan, report, or other document submitted pursuant to this 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. Extension requests shall be sent to the Order Compliance Team at the address listed above.
8. This 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 Order; or (2) pursue violations of a statute within the Commission's jurisdiction, or of a rule adopted or an order or permit issued by the Commission under such a statute.
9. This Order may be executed in separate and multiple counterparts, which together shall constitute a single instrument. Any page of this Order may be copied, scanned, digitized, converted to electronic portable document format ("pdf"), or otherwise reproduced and may be transmitted by digital or electronic transmission, including but not limited to facsimile transmission and electronic mail. Any signature affixed to this Order shall constitute an original signature for all purposes and may be used, filed, substituted, or issued for any purpose for which an original signature could be used. The term "signature" shall include manual signatures and true and accurate reproductions of manual signatures created, executed, endorsed, adopted, or authorized by the person or persons to whom the signatures are attributable. Signatures may be copied or reproduced digitally, electronically, by photocopying, engraving, imprinting, lithographing, electronic mail, facsimile transmission, stamping, or any other means or process which the Executive Director deems acceptable. In this paragraph exclusively, the terms: electronic transmission, owner, person, writing, and written, shall have the meanings assigned to them under TEX. BUS. ORG. CODE § 1.002.
10. The effective date of this Order is the date it is signed by the Commission. A copy of this fully executed Order shall be provided to each of the parties.

SIGNATURE PAGE

TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

For the Commission

For the Executive Director

Date

11/19/2021

Date

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

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

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

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

Fran Falcon

Signature

Fran Falcon

Name (Printed or typed)
Authorized Representative of
The Dow Chemical Company

10-16-20

Date

*Texas Regional Environmental
Leader*

Title

☐ If mailing address has changed, please check this box and provide the new address below:

Instructions: Send the original, signed Order with penalty payment to the Financial Administration Division, Revenue Operations Section at the address in Ordering Provision 1 of this Order.

Attachment A
Docket Number: 2019-1485-IWD-E
SUPPLEMENTAL ENVIRONMENTAL PROJECT

Respondent:	The Dow Chemical Company
Payable Penalty Amount:	\$22,680
SEP Offset Amount:	\$11,340
Type of SEP:	Contribution to a Third-Party Pre-Approved SEP
Third-Party Administrator:	Friends of the River San Bernard
Project:	<i>Friends of the River San Bernard Natural Area Acquisition and Conservation Program</i>
Location of SEP:	Fort Bend County

The Texas Commission on Environmental Quality ("TCEQ") agrees to offset a portion of the administrative penalty amount assessed in this Agreed Order for the Respondent to contribute to a Supplemental Environmental Project ("SEP"). The offset is equal to the SEP Offset Amount set forth above and is conditioned upon completion of the project in accordance with the terms of this Attachment A.

1. Project Description

a. Project

The Respondent shall contribute the SEP Offset Amount to the Third-Party Administrator named above. The contribution will be to the Friends of the River San Bernard for the *Friends of the River San Bernard Natural Area Acquisition and Conservation Program*, to be used as set forth in the SEP Agreement referenced above between the Third-Party Administrator and the TCEQ. The SEP Offset Amount will be used to preserve a contiguous wetland corridor along the San Bernard River in lower Fort Bend County. Ducks Unlimited has protected an adjacent 114-acre tract with two conservation easements, but the contiguity of this wetland corridor greatly depends on the acquisition and preservation of the remaining acreage. This SEP will focus on three (3) tracts of land comprising approximately 645 acres in the wetland corridor on the north side of the San Bernard River and west of Armstrong Road. The Third-Party Administrator shall use SEP Funds to acquire conservation easements on these tracts to provide permanent protection and stewardship of these lands and waters. All tracts acquired in whole or in part with SEP Funds shall be preserved in perpetuity through conservation easements that comply with Subchapter A, Chapter 183, TEXAS NATURAL RESOURCES CODE. The Holder of the San Bernard Conservation Easements shall be WETLANDS AMERICA TRUST, INC. (affiliated with Ducks Unlimited) which Third-Party Administrator certifies is an entity that meets the definition of "holder" under

The Dow Chemical Company
Agreed Order - Attachment A

Section 183.001(2), TEXAS NATURAL RESOURCES CODE. The SEP will be done in accordance with all federal, state and local environmental laws and regulations.

All dollars contributed will be used solely for the direct cost of the Project, including but not limited to supplies, materials, and equipment. Any portion of this contribution that is not spent on the specifically identified SEP may, at the discretion of the Executive Director ("ED"), be applied to another pre-approved SEP.

The Respondent's signature affixed to this Agreed Order certifies that it has no prior commitment to make this contribution and that it is being contributed to settle this enforcement action. The Respondent shall not profit in any manner from this SEP.

b. Environmental Benefit

Permanently protecting this land through the use of conservation easements will prevent pollution, enhance the quality of the environment, and may reduce the amount of pollutants reaching the environment. The land is located within the Central Flyway on the Upper Texas Coast; where approximately 10 million ducks and geese winter each year. Conservation of habitat for migratory birds and other wetland dependent wildlife is critical for maintaining the rich diversity of bird life in this area. Wetlands also benefit people by recharging groundwater supplies, reducing coastal storm surges, retaining flood waters during storm events and improving water quality. By protecting this land and preventing development, water quality, air quality and wildlife habitat will be protected.

c. Minimum Expenditure

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

2. Performance Schedule

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

Kirk Wardlaw, President
Friends of the River San Bernard
P.O. Box 93
Brazoria, Texas 77422

3. Records and Reporting

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

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

4. Failure to Fully Perform

If the Respondent does not perform its obligations under this Attachment A, including full payment of the SEP Offset Amount and submittal of the required reporting described in Sections 2 and 3 above, the ED may require immediate payment of all or part of the SEP Offset Amount.

In the event the ED determines that the Respondent failed to fully implement and complete the Project, the Respondent shall remit payment for all or a portion of the SEP Offset Amount, as determined by the ED, and as set forth in the attached Agreed Order. After receiving notice of failure to complete the SEP, the Respondent shall include the docket number of the attached Agreed Order and a note that the enclosed payment is for the reimbursement of a SEP; shall make the check payable to "Texas Commission on Environmental Quality"; and mail it to:

Texas Commission on Environmental Quality
Litigation Division
Attention: SEP Coordinator, MC 175
P.O. Box 13087
Austin, Texas 78711-3087

5. Publicity

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

6. Recognition

The Respondent may not seek recognition for this contribution in any other state or federal regulatory program.

7. Other SEPs by TCEQ or Other Agencies

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