

Texas Commission on Environmental Quality

Title V Existing

3905

Site Information (Regulated Entity)

What is the name of the permit area to be authorized?	POLYETHYLENE
Does the site have a physical address?	Yes
Physical Address	
Number and Street	2301 N BRAZOSPORT BLVD
City	FREEPORT
State	TX
ZIP	77541
County	BRAZORIA
Latitude (N) (##.#####)	28.9825
Longitude (W) (-###.#####)	95.352777
Primary SIC Code	2869
Secondary SIC Code	
Primary NAICS Code	325199
Secondary NAICS Code	
Regulated Entity Site Information	
What is the Regulated Entity's Number (RN)?	RN100225945
What is the name of the Regulated Entity (RE)?	DOW TEXAS OPERATIONS FREEPORT
Does the RE site have a physical address?	Yes
Physical Address	
Number and Street	2301 N BRAZOSPORT BLVD
City	FREEPORT
State	TX
ZIP	77541
County	BRAZORIA
Latitude (N) (##.#####)	28.9825
Longitude (W) (-###.#####)	-95.352777
Facility NAICS Code	
What is the primary business of this entity?	INDUSTRIAL CHEMICAL MANUFACTURING PLANT

Customer (Applicant) Information

How is this applicant associated with this site?	Owner Operator
What is the applicant's Customer Number (CN)?	CN600356976
Type of Customer	Corporation
Full legal name of the applicant:	
Legal Name	The Dow Chemical Company
Texas SOS Filing Number	1216206
Federal Tax ID	381285128
State Franchise Tax ID	13812851288

State Sales Tax ID	
Local Tax ID	
DUNS Number	84970516
Number of Employees	251-500
Independently Owned and Operated?	

Responsible Official Contact

Person TCEQ should contact for questions about this application:

Organization Name	THE DOW CHEMICAL COMPANY
Prefix	MR
First	JOHN
Middle	
Last	SAMPSON
Suffix	
Credentials	
Title	VICE PRESIDENT
Enter new address or copy one from list:	
Mailing Address	
Address Type	Domestic
Mailing Address (include Suite or Bldg. here, if applicable)	2301 N BRAZOSPORT BLVD
Routing (such as Mail Code, Dept., or Attn:)	
City	FREEPORT
State	TX
ZIP	77541
Phone (###-###-####)	9792389877
Extension	
Alternate Phone (###-###-####)	
Fax (###-###-####)	9792358116
E-mail	txles@dow.com

Duly Authorized Representative Contact

Person TCEQ should contact for questions about this application

Select existing DAR contact or enter a new contact.

Organization Name	FRAN FALCON(THE DOW CHEMICA...)
Prefix	THE DOW CHEMICAL COMPANY
First	MS
Middle	FRAN
Last	FALCON
Suffix	
Credentials	
Title	EH&S REGIONAL LEVERAGED DELIVERY DIRECTOR
Enter new address or copy one from list	
Mailing Address	
Address Type	Domestic

Mailing Address (include Suite or Bldg. here, if applicable)
Routing (such as Mail Code, Dept., or Attn:)
City
State
Zip
Phone (###-###-####)
Extension
Alternate Phone (###-###-####)
Fax (###-###-####)
E-mail

332 HIGHWAY 332 E
TXINN-APB
LAKE JACKSON
TX
77566
9792389978

9792358117
FQFalcon@dow.com

Technical Contact

Person TCEQ should contact for questions about this application:

Select existing TC contact or enter a new contact.

DANISH KHAN(THE DOW CHEMICA...)

Organization Name

THE DOW CHEMICAL COMPANY

Prefix

MR.

First

DANISH

Middle

Last

KHAN

Suffix

Credentials

Title

AIR PERMIT MANAGER

Enter new address or copy one from list:

Mailing Address

Address Type

Domestic

Mailing Address (include Suite or Bldg. here, if applicable)

2301 N BRAZOSPORT BLVD

Routing (such as Mail Code, Dept., or Attn:)

City

FREEPORT

State

TX

ZIP

77541

Phone (###-###-####)

9792381037

Extension

Alternate Phone (###-###-####)

Fax (###-###-####)

E-mail

mdkhan@dow.com

Title V General Information - Existing

1) Permit Type:

SOP

2) Permit Latitude Coordinate:

28 Deg 58 Min 57 Sec

3) Permit Longitude Coordinate:

95 Deg 21 Min 10 Sec

4) Is this submittal a new application or an update to an existing application?

Update

4.1. Select the permit/project number for which this update should be applied.

3905-35920

5) Who will electronically sign this Title V application?

Duly Authorized Representative

6) Does this application include Acid Rain Program or Cross-State Air Pollution Rule requirements?

No

Title V Attachments Existing

Attach OP-1 (Site Information Summary)

Attach OP-2 (Application for Permit Revision/Renewal)

Attach OP-ACPS (Application Compliance Plan and Schedule)

Attach OP-REQ1 (Application Area-Wide Applicability Determinations and General Information)

Attach OP-REQ2 (Negative Applicable Requirement Determinations)

Attach OP-REQ3 (Applicable Requirements Summary)

Attach OP-PBRSUP (Permits by Rule Supplemental Table)

Attach OP-SUMR (Individual Unit Summary for Revisions)

Attach OP-MON (Monitoring Requirements)

Attach OP-UA (Unit Attribute) Forms

If applicable, attach OP-AR1 (Acid Rain Permit Application)

Attach OP-CRO2 (Change of Responsible Official Information)

Attach OP-DEL (Delegation of Responsible Official)

Attach Void Request Form

Attach any other necessary information needed to complete the permit.

[File Properties]

File Name

2025-1-30_OP-CRO1.pdf

Hash

EC9E5F842245617CE0110500DB34F2FDA66E20D1E8AF8A0FE8B74063AF6202D0

MIME-Type

application/pdf

An additional space to attach any other necessary information needed to complete the permit.

Certification

I certify that I am the Duly Authorized Representative for this application and that, based on information and belief formed after reasonable inquiry, the statements and information on this form are true, accurate, and complete.

1. I am Fran Q Falcon, the owner of the STEERS account ER028176.
2. I have the authority to sign this data on behalf of the applicant named above.

- 3. I have personally examined the foregoing and am familiar with its content and the content of any attachments, and based upon my personal knowledge and/or inquiry of any individual responsible for information contained herein, that this information is true, accurate, and complete.
- 4. I further certify that I have not violated any term in my TCEQ STEERS participation agreement and that I have no reason to believe that the confidentiality or use of my password has been compromised at any time.
- 5. I understand that use of my password constitutes an electronic signature legally equivalent to my written signature.
- 6. I also understand that the attestations of fact contained herein pertain to the implementation, oversight and enforcement of a state and/or federal environmental program and must be true and complete to the best of my knowledge.
- 7. I am aware that criminal penalties may be imposed for statements or omissions that I know or have reason to believe are untrue or misleading.
- 8. I am knowingly and intentionally signing Title V Existing 3905.
- 9. My signature indicates that I am in agreement with the information on this form, and authorize its submittal to the TCEC

OWNER OPERATOR Signature: Fran Q Falcon OWNER OPERATOR

Account Number:	ER028176
Signature IP Address:	165.225.32.114
Signature Date:	2025-01-30
Signature Hash:	47028DDAF3697FA5C70F77C16A06E50F53CC1EEEEAEF487D89AB53CE34D67B713
Form Hash Code at time of Signature:	E6D6682078FBB9E3AF3D279B48E5423164E1ACD28747BEB416DDC1258E8D99FF

Submission

Reference Number:	The application reference number is 751923
Submitted by:	The application was submitted by ER028176/Fran Q Falcon
Submitted Timestamp:	The application was submitted on 2025-01-30 at 16:14:37 CST
Submitted From:	The application was submitted from IP address 165.225.32.114
Confirmation Number:	The confirmation number is 624684
Steers Version:	The STEERS version is 6.86
Permit Number:	The permit number is 3905

Additional Information

Application Creator: This account was created by Muhammad Danish Khan

Form OP-CRO1
Certification by Responsible Official
Federal Operating Permit Program
Texas Commission on Environmental Quality

All initial issuance, revision, renewal, and reopening permit application submittals requiring certification must be addressed using this form. Updates to site operating permit (SOP) and temporary operating permit (TOP) applications, other than public notice verification materials, must be certified prior to authorization of public notice or start of public announcement. Updates to general operating permit (GOP) applications must be certified prior to receiving an authorization to operate under a GOP.

I. Identifying Information
RN: RN100225945
CN: CN600356976
Account No.: BL-0082-R
Permit No.: O3905
Project No.: 35920
Area Name: Polyethylene
Company Name: The Dow Chemical Company
II. Certification Type <i>(Please mark appropriate box)</i>
<input type="checkbox"/> Responsible Official Representative <input checked="" type="checkbox"/> Duly Authorized Representative
III. Submittal Type <i>(Please mark appropriate box) (Only one response can be accepted per form)</i>
<input type="checkbox"/> SOP/TOP Initial Permit Application <input type="checkbox"/> Permit Revision, Renewal, or Reopening
<input type="checkbox"/> GOP Initial Permit Application <input checked="" type="checkbox"/> Update to Permit Application
<input type="checkbox"/> Other: _____

Form OP-CRO1
Certification by Responsible Official
Federal Operating Permit Program
Texas Commission on Environmental Quality

All initial issuance, revision, and renewal permit application submittals requiring certification must be accompanied by this form. Updates to acid rain or CSAPR (other than public notice verification materials) must be certified prior to authorization of public notice for the draft permit.

IV. Certification of Truth
This certification does not extend to information which is designated by TCEQ as information for reference only.
I, <u>Francine (Fran) Quinlan Falcon</u> certify that I am the <u>DAR</u> <div style="display: flex; justify-content: space-between; margin-top: 5px;"><i>(Certifier Name printed or typed)</i><i>(RO or DAR)</i></div>
and that, based on information and belief formed after reasonable inquiry, the statements and information dated during the time period or on the specific date(s) below, are true, accurate, and complete: <i>Note: Enter Either a Time Period or Specific Date(s) for each certification. This section must be completed. The certification is not valid without documentation date(s).</i>
Time Period: From <u>4/20/2024</u> to <u>11/9/2024</u> <div style="display: flex; justify-content: space-between; margin-top: 5px;"><i>(Start Date)</i><i>(End Date)</i></div>
Specific Dates: _____ <div style="display: flex; justify-content: space-around; margin-top: 5px;"><i>(Date 1)</i><i>(Date 2)</i><i>(Date 3)</i><i>(Date 4)</i></div>
_____ <div style="display: flex; justify-content: space-around; margin-top: 5px;"><i>(Date 5)</i><i>(Date 6)</i></div>
Signature: _____ Signature Date: _____ Title: _____
Title: <u>EH&S Regional Leveraged Delivery Director</u>

From: Carolyn Maus
Sent: Tuesday, November 12, 2024 8:57 AM
To: Khan, Danish (DD)
Subject: RE: Working Draft Permit -- FOP O3905/Project 35920, The Dow Chemical Company/Dow Texas Operations Freeport

Hi Danish,

Thanks for confirming the draft permit looks good now. The date range of 4/20/2024 through 11/9/2024 for the OP-CRO1 will be good – that covers all the submittals I have from you. I will work on preparing the file for public announcement.

Sincerely,

Carolyn Maus, P.E.
Air Permits Division
Texas Commission on Environmental Quality
P.O. Box 13087, MC 163
Austin, TX 78711
Phone: (512) 239-6204
Fax: (512) 239-1300



How are we doing? Fill out our online customer satisfaction survey at www.tceq.texas.gov/customersurvey

From: Khan, Danish (DD) <MDKhan@dow.com>
Sent: Saturday, November 9, 2024 3:40 PM
To: Carolyn Maus <carolyn.maus@tceq.texas.gov>
Cc: Khan, Danish (DD) <MDKhan@dow.com>
Subject: RE: Working Draft Permit -- FOP O3905/Project 35920, The Dow Chemical Company/Dow Texas Operations Freeport

Good afternoon Carolyn,

I do not have any other comments on the draft permit submitted 10/2/2024. Please proceed with the next step. I will submit the OP-CRO1 via STEERS for dates 4/20/2024 through 11/9/2024.

Please let me know if the above dates are correct to be used for OP-CRO1 certifications.

Thanks for allowing me additional time for the draft review.

Thanks,
Danish

From: Carolyn Maus
Sent: Tuesday, October 29, 2024 4:28 PM
To: Khan, Danish (DD)
Subject: RE: Working Draft Permit -- FOP O3905/Project 35920, The Dow Chemical Company/Dow Texas Operations Freeport

Thanks, Danish. I was just going to reach out to you for a status update. I will look out for your response at the end of the week.

Sincerely,

Carolyn Maus, P.E.
Air Permits Division
Texas Commission on Environmental Quality
P.O. Box 13087, MC 163
Austin, TX 78711
Phone: (512) 239-6204
Fax: (512) 239-1400



How are we doing? Fill out our online customer satisfaction survey at www.tceq.texas.gov/customersurvey

From: Khan, Danish (DD) <MDKhan@dow.com>
Sent: Tuesday, October 29, 2024 4:25 PM
To: Carolyn Maus <carolyn.maus@tceq.texas.gov>
Subject: RE: Working Draft Permit -- FOP O3905/Project 35920, The Dow Chemical Company/Dow Texas Operations Freeport

Carolyn, My apologies for the delayed response. I have not provided you the response for this draft. I will submit our responses by end of the week along with OP-CRO1.

Thanks,
Danish

General Business

From: Carolyn Maus <carolyn.maus@tceq.texas.gov>
Sent: Wednesday, October 2, 2024 11:34 PM
To: Khan, Danish (DD) <MDKhan@dow.com>
Subject: RE: Working Draft Permit -- FOP O3905/Project 35920, The Dow Chemical Company/Dow Texas Operations Freeport

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Hi Danish,

Thanks for your patience in me getting this back to you. I have prepared another revised WDP based on your responses to my questions. That document is attached. Here are the changes made:

- 1) Updated the date in Special Term and Condition 14 to refer to the latest OP-PBR SUP submittal.
- 2) Removed PBR registration number 153912 from unit B27P3FU1.
- 3) Removed PBR 106.262 and PBR registration number 160055 from unit B93P6PV939.
- 4) Removed PBR registration numbers 166920 and 156764 (units B93P5FU1, B93P5FU2).
- 5) Removed PBR registration number 163390 (unit B93P5FU1).
- 6) Removed PBR registration number 161815 (units B93P5FU1, B93P5ST515).
- 7) Removed PBR registration number 155873 (unit B93P5F1).
- 8) Updated issuance date for NSR permit 114991 to 05/03/2024.
- 9) Added the paragraph about Test Method 9 to the PM text for all the periodic monitoring tables that currently address visible emissions observations. I made one adjustment to the final sentence of the text for the revised units as well as GRP-PROP3A and GRP-PROP3B. The previous wording began "If the result of the Test Method 9 is an opacity above the corresponding opacity limit..." I have adjusted that to "If the result of the Test Method 9 is opacity above the opacity limit in the applicable requirement..." This makes it consistent with some new options we'll be adding to guidance in the future, and also clarifies the meaning (the "corresponding opacity limit" phrase was originally from PM-P-001, where there is an opacity limit corresponding with a particulate matter limit, so the phrase isn't as clear when taken out of context).
- 10) For the periodic monitoring tables where Test Method 9 was added, I noticed that their existing deviation limits only referred to there being no visible emissions. To account for the addition to the text, I went ahead and updated these deviation limits to use the same format as GRP-PROP3A and GRP-PROP3B, but with the 20% opacity value appropriate for 111.111(a)(1)(B).

Please check the revised draft to confirm I've made all the correct changes and to approve the additional adjustments for the periodic monitoring. Please let me know if there are any final comments by **Monday, October 14, 2024**. Also, please provide an OP-CRO1 to certify the updates we've had over the course of the project. The first response I have on record occurred on 04/20/2024, so you could use the Time Period option beginning with that and ending with the date of your response to this draft. The OP-CRO1 may be submitted in STEERS, or if you prefer, you may email me a scan (if you elect to email me the copy, then I would need the wet ink original to follow in the regular mail).

If you have any questions, feel free to contact me.

Sincerely,

Carolyn Maus, P.E.
Air Permits Division
Texas Commission on Environmental Quality
P.O. Box 13087, MC 163
Austin, TX 78711
Phone: (512) 239-6204
Fax: (512) 239-1400



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General Business

From: Khan, Danish (DD) <MDKhan@dow.com>
Sent: Monday, July 29, 2024 10:51 PM
To: Carolyn Maus <carolyn.maus@tceq.texas.gov>
Cc: Khan, Danish (DD) <MDKhan@dow.com>
Subject: RE: Working Draft Permit -- FOP O3905/Project 35920, The Dow Chemical Company/Dow Texas Operations Freeport

Good evening Carolyn,

Thanks for the draft permit and my apologies for the delayed response (it took longer than expected to get back to normal and appreciate additional time to respond back to the request). I do not have any additional comments to the draft permit but I do have two (2) additional request mentioned below. Please see responses below to questions:

From: Khan, Danish (DD) <MDKhan@dow.com>
Sent: Monday, July 29, 2024 10:51 PM
To: Carolyn Maus
Cc: Khan, Danish (DD)
Subject: RE: Working Draft Permit -- FOP O3905/Project 35920, The Dow Chemical Company/Dow Texas Operations Freeport
Attachments: OP-PBRSUP_Revised_07-29-2024.docx; 2024-4-19_OP-UA15_pg13d.pdf

Good evening Carolyn,

Thanks for the draft permit and my apologies for the delayed response (it took longer than expected to get back to normal and appreciate additional time to respond back to the request). I do not have any additional comments to the draft permit but I do have two (2) additional request mentioned below. Please see responses below to questions:

- 1) The WDP comment email mentioned that Tables 13a and 13d of the UA-15 were attached for B93P6DU713. I got Table 13a but I did not see Table 13d. Please provide that second page.

[Response: Table 13\(d\) attached with this response.](#)

- 2) In checking over the OP-PBRSUP, I noticed a few issues. In each case, determine which information is correct and let me know if the permit needs a correction. If the OP-PBRSUP needs any edits, please submit the full set of tables again and re-date them.

- a. On Table A, the row for registration 153912 lists units B27P3FU1 and B27P3FU3. In the permit, this registration is listed for B27P3FU1, B27P3FU2, and B27P3FU3. Then, when I looked at the registration application, that only mentioned units B27P3FU2 and B27P3FU3.

[Response: Registration 153912 is for B27P3FU2 and B27P3FU3. OP-PBRSUP updated.](#)

- b. On Table A, the row for registration 168120 lists 106.261 and 106.262. In the permit, this registration number is listed against 106.261, 106.262, and 106.264. The registration application lists all three PBRs.

[Response: OP-PBRSUP updated to include 106.264/09/04/2000 for registration 168120.](#)

- c. On Table A, the row for registration 160055 lists unit B93P6PV639 with PBRs 106.261, 106.262, and 106.263. I agree that part looks correct. However, the permit also lists this registration number for unit B93P6PV939, for 106.262 only. From the registration applications, it looks like the second unit was added in the 2021 registration revision, but that application lists both 106.261 and 106.262. If the second uses the same registration, please add it in a second line to the form since it doesn't have all the same PBRs as the first unit.

[Response: This is an error in current permit. B93P6PV939 is authorize via NSR 119089. Please delete 106.262/11/01/2003 \[160055\] for B93P6PV939.](#)

- d. Table B looks correct. However, I believe Table C should be blank - all of the listed PBRs are required by the instructions to go on Tables A or B, and it appears they are already on Table B. In addition, Table C is only for PBRs that are not required to go on the first two tables. Please remove data from Table C (you can mark an N/A in the first row to indicate you have no data for this table).

Response: OP-PBRSUP updated as requested to delete table C.
Please note following PBR has been removed from OP-PBRSUP as these are consolidated into NSR Permit 114991 issued May 3, 2024 and these PBR's are voided.

Voided PBR registration No.: 166920, 163390, 161815, 156764 and 155873

Two Additional request:

- 1) OP-PBRSUP updated to include additional PBR claimed 106.371. Dow claimed this PBR for temporary cooling tower due to permanently cooling tower out of service for repairs from damages from Hurricane Beryl.
- 2) Updated language request for periodic monitoring summary for rule 30 TAC Chapter 111, Visible Emissions. Please add the following paragraph for all periodic monitoring summary for this rule. The following language is already in the permit for Unit ID No.: GRP-PROP3A and GP-PROP3B
“ As an alternative, the permit holder may determine the opacity consistent with Test Method 9, as soon as practicable, but no later than 24 hours after observing visible emissions. If the result of the Test Method 9 is an opacity above the corresponding opacity limit, the permit holder shall report a deviation.”

Thanks,

Danish Khan

EH&S Expertise Improvement Manager

Dow

332 SH 332 E., LJ APB 2A197C, Lake Jackson, TX 77566
phone: 979.238.1037 | email: mdkhan@dow.com



My working day and hours may not be your working day and hours.

Please do not feel obliged to reply to this email outside of your normal working hours.

General Business

From: Carolyn Maus <carolyn.maus@tceq.texas.gov>

Sent: Friday, July 26, 2024 2:14 PM

To: Khan, Danish (DD) <MDKhan@dow.com>

Subject: RE: Working Draft Permit -- FOP O3905/Project 35920, The Dow Chemical Company/Dow Texas Operations Freeport

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Permit By Rule Supplemental Table (Page 1)
Table A: Registered Permits by Rule (30 TAC Chapter 106) for the Application Area
Texas Commission on Environmental Quality

Date	Permit Number	Regulated Entity Number
07/29/2024	03905	RN100225945

Unit ID No.	Registration No.	PBR No.	Registration Date
B27P3VSDC, B27P3V501, B27P3V502, B37SB201, B37SB202, B37SB203, B37SB204, B37SB205, B37SB206, B37SB207, B37SB208, B37SB901, B37SB902	71088	106.261/11/01/2003 106.262/11/01/2003	3/1/2004
B27P3FU1 B27P3FU2	148641	106.261/11/01/2003	11/3/2017
B27P3F1, B27P3FU1	149252	106.261/11/01/2003	11/21/2017
B27P3FU1	149390	106.261/11/01/2003	12/8/2017
B27P3FU1 B27P3FU2	150600	106.262/11/01/2003	3/28/2018
B27P3F1, B27P3LR1	152016	106.261/11/01/2003 106.262/11/01/2003	7/11/2018
B27P3FU2 B27P3FU3	153912	106.261/11/01/2003 106.262/11/01/2003	11/16/2018
B27P3FU3	154148	106.262/11/01/2003	1/11/2019
B37P3PLF372	155071	106.264/09/04/2000	2/22/2019
B27P3FU1 B27P3FU3	156026	106.261/11/01/2003	3/29/2019

Permit By Rule Supplemental Table (Page 1)
Table A: Registered Permits by Rule (30 TAC Chapter 106) for the Application Area
Texas Commission on Environmental Quality

Date	Permit Number	Regulated Entity Number
07/29/2024	03905	RN100225945

Unit ID No.	Registration No.	PBR No.	Registration Date
B27P3FU1 B27P3FU3	156330	106.262/11/01/2003	4/29/2019
B27P3FU1	156390	106.261/11/01/2003 106.262/11/01/2003	5/1/2019
B27P3FU2	157619	106.262/11/01/2003	7/31/2019
B27P3FU1	158566	106.262/11/01/2003	10/23/2019
B27P3FU3	159019	106.261/11/01/2003 106.262/11/01/2003	12/9/2019
B27P3FU1, B27P3FU2, B27P3FU3	159735	106.261/11/01/2003 106.262/11/01/2003	4/17/2020
B27P3FU1	165806	106.262/11/01/2003	7/23/2021
B27P3FU1, B27P3FU2	168120	106.261/11/01/2003 106.262/11/01/2003 106.264/09/04/2000	3/7/2022
B27P3FU1	168877	106.262/11/01/2003	4/28/2022

Permit By Rule Supplemental Table (Page 1)
Table A: Registered Permits by Rule (30 TAC Chapter 106) for the Application Area
Texas Commission on Environmental Quality

Date	Permit Number	Regulated Entity Number
07/29/2024	03905	RN100225945

Unit ID No.	Registration No.	PBR No.	Registration Date
B41P4FU1	164273	106.261/11/01/2003	2/22/2021
B41P4ST32, B41P4ST33	165104	106.264/09/04/2000	5/20/2021
B41P4SP2	166379	106.264/09/04/2000	9/10/2021
B41P4FU1	169965	106.261/11/01/2003	8/15/2022
B93P5FU1	162477	106.261/11/01/2003 106.262/11/01/2003	9/6/2020

Permit By Rule Supplemental Table (Page 1)
Table A: Registered Permits by Rule (30 TAC Chapter 106) for the Application Area
Texas Commission on Environmental Quality

Date	Permit Number	Regulated Entity Number
07/29/2024	03905	RN100225945

Unit ID No.	Registration No.	PBR No.	Registration Date
B93P6D5401, B93P6D5402, B93P6D6402	153040	106.261/11/01/2003	10/12/2018
B93P6PV931, B93P6PV941, B93P6PV971	155946	106.262/11/01/2003	03/20/2019
B93P5ST806, B93P5ST807	158187	106.261/11/01/2003 106.262/11/01/2003	09/26/2019
B93P6PV639	160055	106.261/11/01/2003 106.262/11/01/2003 106.263/11/01/2001	03/03/2021
B93P6FU3	164364	106.261/11/01/2003	3/26/2021
B93P6FU3	168422	106.261/11/01/2003	4/6/2022

Permit By Rule Supplemental Table (Page 2)
Table B: Claimed (not registered) Permits by Rule (30 TAC Chapter 106) for the Application Area
Texas Commission on Environmental Quality

Date	Permit Number	Regulated Entity Number
07/29/2024	03905	RN100225945

Unit ID No.	PBR No.	Version No./Date
B93SBMB01	106.452	09/04/2000
B93P5SC1	106.454	11/01/2001
B27P3SC01	106.454	07/08/1998
B41P4SC01	106.454	07/08/1998
B41P3ST444	106.476	09/04/2000
B27P3BT2600	106.472	09/04/2000
B27P3CTTEMP	106.371	09/04/2000

Permit By Rule Supplemental Table (Page 3)
Table C: Claimed (not registered) Permits by Rule (30 TAC Chapter 106) for Insignificant Sources for the Application Area
Texas Commission on Environmental Quality

Date	Permit Number	Regulated Entity Number
07/29/2024	03905	RN100225945

PBR No.	Version No./Date
N/A	

Permit By Rule Supplemental Table (Page 4)
Table D: Monitoring Requirements for registered and claimed PBRs for the Application Area
Texas Commission on Environmental Quality

Date	Permit Number	Regulated Entity Number
07/29/2024	03905	RN100225945

Unit ID No.	PBR No.	Version No./Date Or Registration No.	Monitoring Requirement
B27P3VSDC, B27P3V501, B27P3V502, B37SB201, B37SB202, B37SB203, B37SB204, B37SB205, B37SB206, B37SB207, B37SB208, B37SB901, B37SB902	106.261/11/01/2003 106.262/11/01/2003	71088	C Train Production records.
B27P3FU1 B27P3FU2	106.261/11/01/2003	148641	28VHP LDAR Monitoring
B27P3F1, B27P3FU1	106.261/11/01/2003	149252	Flare Flow monitoring and 28VHP LDAR Monitoring
B27P3FU1	106.261/11/01/2003	149390	28VHP LDAR Monitoring
B27P3FU1 B27P3FU2	106.262/11/01/2003	150600	28VHP LDAR Monitoring
B27P3F1, B27P3LR1	106.261/11/01/2003 106.262/11/01/2003	152016	Flare Flow monitoring and loading throughout
B27P3FU2 B27P3FU3	106.261/11/01/2003 106.262/11/01/2003	153912	28VHP LDAR Monitoring
B27P3FU3	106.262/11/01/2003	154148	28VHP LDAR Monitoring
B37P3PLF372	106.264/09/04/2000	155071	Like for Like replacement
B27P3FU1 B27P3FU3	106.261/11/01/2003	156026	28VHP LDAR Monitoring

TCEQ-20875 (APDG6535v1, revised 05/22) OP-PBRSUP

This form for use by facilities subject to air quality permit requirements and may be revised periodically (Title V IMS Release 05/20)

Permit By Rule Supplemental Table (Page 4)
Table D: Monitoring Requirements for registered and claimed PBRs for the Application Area
Texas Commission on Environmental Quality

Date	Permit Number	Regulated Entity Number
07/29/2024	03905	RN100225945

Unit ID No.	PBR No.	Version No./Date Or Registration No.	Monitoring Requirement
B27P3FU1 B27P3FU3	106.262/11/01/2003	156330	28VHP LDAR Monitoring
B27P3FU1	106.261/11/01/2003 106.262/11/01/2003	156390	28VHP LDAR Monitoring
B27P3FU2	106.262/11/01/2003	157619	28VHP LDAR Monitoring
B27P3FU1	106.262/11/01/2003	158566	28VHP LDAR Monitoring
B27P3FU3	106.261/11/01/2003 106.262/11/01/2003	159019	28VHP LDAR Monitoring
B27P3FU1, B27P3FU2, B27P3FU3	106.261/11/01/2003 106.262/11/01/2003	159735	28VHP LDAR Monitoring
B27P3FU1	106.262/11/01/2003	165806	28VHP LDAR Monitoring
B27P3FU1, B27P3FU2	106.261/11/01/2003 106.262/11/01/2003 106.264/09/04/2000	168120	28VHP LDAR Monitoring
B27P3FU1	106.262/11/01/2003	168877	28VHP LDAR Monitoring

Permit By Rule Supplemental Table (Page 4)
Table D: Monitoring Requirements for registered and claimed PBRs for the Application Area
Texas Commission on Environmental Quality

Date	Permit Number	Regulated Entity Number
07/29/2024	03905	RN100225945

Unit ID No.	PBR No.	Version No./Date Or Registration No.	Monitoring Requirement
B41P4FU1	106.261/11/01/2003	164273	28VHP LDAR Monitoring
B41P4ST32, B41P4ST33	106.264/09/04/2000	165104	Tank Throughput records
B41P4SP2	106.264/09/04/2000	166379	Train 2 production records
B41P4FU1	106.261/11/01/2003	169965	28VHP LDAR Monitoring
B93P5FU1	106.261/11/01/2003 106.262/11/01/2003	162477	28VHP LDAR Monitoring

Permit By Rule Supplemental Table (Page 4)
Table D: Monitoring Requirements for registered and claimed PBRs for the Application Area
Texas Commission on Environmental Quality

Date	Permit Number	Regulated Entity Number
07/29/2024	03905	RN100225945

Unit ID No.	PBR No.	Version No./Date Or Registration No.	Monitoring Requirement
B93P6D5401, B93P6D5402, B93P6D6402	106.261/11/01/2003	153040	Records of bag transferred.
B93P6PV931, B93P6PV941, B93P6PV971	106.262/11/01/2003	155946	Record number of hours of operation.
B93P5ST806, B93P5ST807	106.261/11/01/2003 106.262/11/01/2003	158187	Records of Tank Throughput.
B93P6PV639	106.261/11/01/2003 106.262/11/01/2003 106.263/11/01/2001	160055	Vent air flow rate.
B93P6FU3	106.261/11/01/2003	164364	28VHP LDAR Monitoring
B93P6FU3	106.261/11/01/2003	168422	28VHP LDAR Monitoring
B93SBMB01	106.452/9/4/2000	6/22/2020	Records of blast media used
B93P5SC1	106.454/11/1/2001	5/22/2017	SDS of the solvent used
B27P3SC01	106.454/07/08/1998	08/23/2005	SDS of the solvent used
B41P4SC01	106.454/07/08/1998	08/23/2005	SDS of the solvent used
B41P3ST444	106.476/09/04/2000	08/23/2005	SDS of the material stored in tank

Permit By Rule Supplemental Table (Page 4)
Table D: Monitoring Requirements for registered and claimed PBRs for the Application Area
Texas Commission on Environmental Quality

Date	Permit Number	Regulated Entity Number
07/29/2024	03905	RN100225945

Unit ID No.	PBR No.	Version No./Date Or Registration No.	Monitoring Requirement
B27P3BT2600	106.472	09/04/2000	SDS of the material stored in tank. This tank does not store volatile organic compound (VOC).
B27P3CTTEMP	106.371	09/04/2000	Monthly Total Dissolved Solids (TDS) and VOC sampling.

Emission Point/Stationary Vent/Distillation Operation Vent/Process Vent Attributes
Form OP-UA15 (Page 35)

Federal Operating Permit Program

Table 13d: Title 40 Code of Federal Regulations Part 63 (40 CFR Part 63)
Subpart FFFF: National Emission Standards for Hazardous Air Pollutants:
Miscellaneous Organic Chemical Manufacturing - Continuous Process Vents
Texas Commission on Environmental Quality

Date	Permit No.	Regulated Entity No.
04/19/2024	03905	RN100225945

Emission Point ID No.	SOP Index No.	Designated GRP1	Designated HAL	Determined HAL	Prior Eval	Assessment Waiver	Assessment Waiver ID	Negative Pressure	Bypass Line
B93P6DU713	63FFFF-01	YES	NO	NO	NO	NO		NO	CARSEAL

From: Carolyn Maus
Sent: Friday, July 26, 2024 2:14 PM
To: Khan, Danish (DD)
Subject: RE: Working Draft Permit -- FOP O3905/Project 35920, The Dow Chemical Company/Dow Texas Operations Freeport

Hi Danish,

Hope things have gotten back to normal, somewhat, since the hurricane. I wanted to check in about the status of this response. Have you had a chance to look through it yet? Please let me know your progress so we can come up with a new deadline.

Sincerely,

Carolyn Maus, P.E.
Air Permits Division
Texas Commission on Environmental Quality
P.O. Box 13087, MC 163
Austin, TX 78711
Phone: (512) 239-6204
Fax: (512) 239-1300



How are we doing? Fill out our online customer satisfaction survey at www.tceq.texas.gov/customersurvey

From: Khan, Danish (DD) <MDKhan@dow.com>
Sent: Thursday, July 11, 2024 2:15 PM
To: Carolyn Maus <carolyn.maus@tceq.texas.gov>
Subject: RE: Working Draft Permit -- FOP O3905/Project 35920, The Dow Chemical Company/Dow Texas Operations Freeport

Thanks Carolyn. Unfortunately still don't have electricity or internet. I am located in southwest of Houston.

General Business

From: Carolyn Maus <carolyn.maus@tceq.texas.gov>
Sent: Thursday, July 11, 2024 9:04 AM
To: Khan, Danish (DD) <MDKhan@dow.com>
Subject: Re: Working Draft Permit -- FOP O3905/Project 35920, The Dow Chemical Company/Dow Texas Operations Freeport

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Hi Danish,

Thanks for the update. An extension for your response is fine. Hopefully you are all safe and have all your utilities restored soon.

-Carolyn

From: Khan, Danish (DD) <MDKhan@dow.com>
Sent: Tuesday, July 9, 2024 10:18 PM
To: Carolyn Maus <carolyn.maus@tceq.texas.gov>
Cc: Khan, Danish (DD) <MDKhan@dow.com>
Subject: RE: Working Draft Permit -- FOP O3905/Project 35920, The Dow Chemical Company/Dow Texas Operations Freeport

Carolyn, Due to recent storm I do not have internet access. Can you please allow additional 10 days to respond back to the draft permit.

Thanks,
Danish

General Business

From: Carolyn Maus <carolyn.maus@tceq.texas.gov>
Sent: Saturday, June 29, 2024 7:43 PM
To: Khan, Danish (DD) <MDKhan@dow.com>
Subject: RE: Working Draft Permit -- FOP O3905/Project 35920, The Dow Chemical Company/Dow Texas Operations Freeport

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Good evening,

I have attached a revised WDP implementing your comments and responses to my questions. Here are a list of changes that have been made to the permit since the first WDP:

1. Added date from OP-PBRUP to Special Term and Condition 14.
2. Added row for connectors in gas/vapor and light liquid service to the MACT FFFF requirements for B27P3FU3.
3. Removed recordkeeping citation 63.998(c)(2)(iii) from MACT FFFF requirements for B93P5H510 due to your confirmation that vent stream is introduced with primary fuel.
4. Removed the batch process vent set of MACT FFFF requirements from PROP6A.

There were no changes to B93P5LR3 – the data you provided on Table 9a of OP-UA04 matched the attributes I had temporarily selected when creating the WDP.

I also have some remaining questions, as follows:

1. The WDP comment email mentioned that Tables 13a and 13d of the UA-15 were attached for B93P6DU713. I got Table 13a but I did not see Table 13d. Please provide that second page.
2. In checking over the OP-PBRSUP, I noticed a few issues. In each case, determine which information is correct and let me know if the permit needs a correction. If the OP-PBRSUP needs any edits, please submit the full set of tables again and re-date them.
 - a. On Table A, the row for registration 153912 lists units B27P3FU1 and B27P3FU3. In the permit, this registration is listed for B27P3FU1, B27P3FU2, and B27P3FU3. Then, when I looked at the registration application, that only mentioned units B27P3FU2 and B27P3FU3.
 - b. On Table A, the row for registration 168120 lists 106.261 and 106.262. In the permit, this registration number is listed against 106.261, 106.262, and 106.264. The registration application lists all three PBRs.
 - c. On Table A, the row for registration 160055 lists unit B93P6PV639 with PBRs 106.261, 106.262, and 106.263. I agree that part looks correct. However, the permit also lists this registration number for unit B93P6PV939, for 106.262 only. From the registration applications, it looks like the second unit was added in the 2021 registration revision, but that application lists both 106.261 and 106.262. If the second uses the same registration, please add it in a second line to the form since it doesn't have all the same PBRs as the first unit.
 - d. Table B looks correct. However, I believe Table C should be blank - all of the listed PBRs are required by the instructions to go on Tables A or B, and it appears they are already on Table B. In addition, Table C is only for PBRs that are not required to go on the first two tables. Please remove data from Table C (you can mark an N/A in the first row to indicate you have no data for this table).

Please check over the revised draft and provide a response to my questions by **Wednesday, July 10, 2024**.

Sincerely,

Carolyn Maus, P.E.
Air Permits Division
Texas Commission on Environmental Quality
P.O. Box 13087, MC 163
Austin, TX 78711
Phone: (512) 239-6204
Fax: (512) 239-1400



How are we doing? Fill out our online customer satisfaction survey at www.tceq.texas.gov/customersurvey

From: Carolyn Maus
Sent: Saturday, April 20, 2024 1:27 PM
To: Khan, Danish (D) <MDKhan@dow.com>
Subject: RE: Working Draft Permit -- FOP O3905/Project 35920, The Dow Chemical Company/Dow Texas Operations Freeport

Thanks, Danish! I will go through your responses and prepare a revised WDP for your review.

Carolyn Maus, P.E.
Air Permits Division
Texas Commission on Environmental Quality
P.O. Box 13087, MC 163
Austin, TX 78711
Phone: (512) 239-6204
Fax: (512) 239-1300



How are we doing? Fill out our online customer satisfaction survey
at www.tceq.texas.gov/customersurvey

From: Khan, Danish (D) <MDKhan@dow.com>
Sent: Saturday, April 20, 2024 12:12 AM
To: Carolyn Maus <carolyn.maus@tceq.texas.gov>
Cc: Khan, Danish (D) <MDKhan@dow.com>
Subject: RE: Working Draft Permit -- FOP O3905/Project 35920, The Dow Chemical Company/Dow Texas Operations Freeport

Hello Carolyn,

Please see responses below.

1. The OP-PBRSUP was submitted with only the new tank under 106.472. This form is unlike the rest of our forms – it cannot be submitted partially (meaning only containing changes for a given project). Instead, you have to keep the complete copy (addressing all PBRs used in the permit area) and you need to edit that complete copy and re-submit when there are changes. Therefore, please re-submit the previous full copy of the form with this new tank added on to it, and re-date all tables.
[Response: Full copy of OP-PBRSUP is attached with this response.](#)
2. MACT FFFF citation updates: I have made most of the citation updates that were indicated on the OP-REQ3. There were also some citations where I added the [G] grouping notation since the citation has subparagraphs that appeared to apply, there were a few citation categories that I adjusted for consistency among units, and then there were some

From: Khan, Danish (D) <MDKhan@dow.com>
Sent: Saturday, April 20, 2024 12:12 AM
To: Carolyn Maus
Cc: Khan, Danish (D)
Subject: RE: Working Draft Permit -- FOP O3905/Project 35920, The Dow Chemical Company/Dow Texas Operations Freeport
Attachments: Responses_MACT FFFF Citation Issues.docx; 2024-4-19_OP-PBR SUP_ Revised.pdf; 2024-4-19_OP-UA15_pg13d.pdf; 2024-4-19_OP-UA15_pg_13a.pdf; 2024-4-19_OP-UA4_Table_9a.pdf

Hello Carolyn,

Please see responses below.

1. The OP-PBR SUP was submitted with only the new tank under 106.472. This form is unlike the rest of our forms – it cannot be submitted partially (meaning only containing changes for a given project). Instead, you have to keep the complete copy (addressing all PBRs used in the permit area) and you need to edit that complete copy and re-submit when there are changes. Therefore, please re-submit the previous full copy of the form with this new tank added on to it, and re-date all tables.
[Response: Full copy of OP-PBR SUP is attached with this response.](#)
2. MACT FFFF citation updates: I have made most of the citation updates that were indicated on the OP-REQ3. There were also some citations where I added the [G] grouping notation since the citation has subparagraphs that appeared to apply, there were a few citation categories that I adjusted for consistency among units, and then there were some changes I did not make because I still had questions or they seemed erroneous. The attached document MACT FFFF Citation Issues describes any place where I differed from your OP-REQ3. Please review those items and address my questions.
[Response: Please see attached MACT FFFF document with comments.](#)
3. For unit B93P6DU713, I updated the citations based on the OP-REQ3, and I understand that not all those changes are part of our flowchart yet. However, some of the changes were not due to the amendment but rather to a correction needed for the vent's attributes (such as changing from Group 2 to Group 1). Therefore, please update Tables 13a-13g of UA-15 so that we have accurate attributes.
[Response: OP-UA15 table 13 a and d are attached.](#)
4. For unit B93P5LR3, please fill out the MACT FFFF tables on OP-UA04.
[Response: OP-UA4 table 9a attached.](#)

Draft permit: please delete PROP6A batch process vents set of citation as requested in attached MACT FFFF citations issues.

Thanks,
Danish

Unit ID(s)	Citation	Change(s) Made in Permit
All units that had these citations on the OP-REQ3	63.2450(e)(4), 63.2450(e)(5), 63.2450(e)(6), 63.2450(v), 63.2470(f), 63.2525(l), 63.2525(m), 63.2525(p), 63.2525(q), 63.2525(r), 63.2520(e)(11), 63.2520(e)(14)	Added grouped notation [G].
All units that had this citation on the OP-REQ3	63.671	I moved to monitoring since it addresses that type of requirement.
All units that had this citation on the OP-REQ3	63.2450(k)(1)(ii)	Most units had this under monitoring, while two (B93P5H510, B93P6H510) had it under recordkeeping. I placed under both categories.
B93P5H510, B93P6H510, PROP3, PROP5A, PROP5B, PROP6A	63.2520(d)	Added grouped notation [G].
B27P3FU1, B27P3FU2, B27P3FU3, B93P6FU3	63.2520(d)(4) (row for pressure relief devices in gasp/vapor service)	Added grouped notation [G].
PROP5B, PROP6B	63.2535(m)	Added grouped notation [G].
PROP5B, PROP6B	63.670, 63.671	All other units whose flare citations were updated (e.g. removing 63.11(b) and MACT SS flare items) had these citations. I included for consistency.
B27P3FU1, B27P3FU2, B27P3FU3, GRP-FUG EMISS, B93P6FU3	63.2480(b)(7)	OP-REQ3 marked this for removal for all fugitive components. Does this mean that every single fugitive component in each unit is considered unsafe- or difficult-to-monitor? For now, I did not remove.
B27P3FU1, B27P3FU2, B27P3FU3, GRP-FUG EMISS, B93P6FU3	63.2480(f)(1)-(f)(4) (in the row for compressors)	OP-REQ3 added all of these to compressors. 63.2480(f)(1) relates to pumps in light liquid service. 63.2480(f)(2) relates to closed vent system/control device. 63.2480(f)(4) relates to MACT UU, irrelevant since units comply with MACT H. Only 63.2480(f)(3) was added.
B27P3FU1, B27P3FU2, B27P3FU3, GRP-FUG EMISS, B93P6FU3	63.181(c)	OP-REQ3 asked to remove this from all components. However, there are some components that still have visual inspection requirements -

Commented [DK1]: Agreed. No comments

Commented [DK2]: Agreed. No comments

Commented [DK3]: Agreed. No comments

Commented [DK4]: Agreed. No comments

Commented [DK5]: Agreed. No comments

Commented [DK6]: Agreed. No comments

Commented [DK7]: Agreed. No comments

Commented [DK8]: Agreed. Not required to be removed.

Commented [DK9]: Correct.

		pumps in light liquid service, connectors in gas/vapor/light liquid service, agitators in gas/vapor/light liquid service, and components subject to 63.169. I did not remove it for those.
B27P3FU1, B27P3FU2, B27P3FU3, GRP-FUG EMISS, B93P6FU3	63.2520(e)(14) (in the row for pressure relief devices in gas/vapor service)	63.2520(e)(14) is for maintenance vents so I changed to [G]63.2520(e)(15). I believe there are additional subparagraphs that will apply so I added them too.
B27P3FU3	Row for connectors in gas/vapor and light liquid service	Unlike other fugitive units, this unit did not have a row for connectors in gas/vapor and light liquid service in the permit, so I didn't have anything to edit. If I need to add this component, just let me know.
B93P5F1 (both 63FFFF-01 and 63FFFF-02); B93P5DU713; B93P6DU713	63.115(d)(3)(iii)	OP-REQ3 showed this removed from other units but not these. I took out for now for consistency and because I didn't think this stream was halogenated.
B93P5F1 (both 63FFFF-01 and 63FFFF-02); B93P5DU713; B93P6DU713; B93P5LR1; B93P5LR2; B93P5LR3	[G]63.998(d)(1)	OP-REQ3 showed this as removed. It must remain because it pertains to closed vent system records.
B93P5F1 (both 63FFFF-01 and 63FFFF-02)	63.999(b)(5)	OP-REQ3 did not remove this citation for reporting using of alternative recordkeeping, but it did remove 63.999(c)(6)(iv) and 63.998(b)(5) which also relate to that. I removed 63.999(b)(5) for consistency.
B93P5F1 (both 63FFFF-01 and 63FFFF-02)	[G]63.999(d)(1)-(2)	OP-REQ3 did not remove these (related to requesting alternative monitoring) but for other units they were. I removed for consistency.
B93P5DU713, B93P6DU713	63.999(c)(1), 63.999(c)(2)(i), 63.999(c)(2)(iii)	OP-REQ3 showed these as removed but they are still needed for general closed vent system reporting and for the bypass.
B93P5LR1, B93P5LR2	63.999(c)(1), 63.999(c)(2)(i)	OP-REQ3 showed these as removed but they are still needed for general closed vent system reporting.
B93P5DU713, B93P6DU713	63.2520(e) and subparagraphs	OP-REQ3 only listed 63.2520(e)(11) and (e)(12), but I believe there are other subparagraphs that will apply so I added them too.

Commented [DK10]: Agreed. Don't remove.

Commented [DK11]: Agreed.

Commented [DK12]: Please add row for connectors for FFFF in gas/vapor and LL. It was inadvertently missed out.

Commented [DK13]: Correct.

Commented [DK14]: Agreed.

Commented [DK15]: Agreed. Please remove

Commented [DK16]: Agreed.

Commented [DK17]: Agreed.

Commented [DK18]: Agreed.

Commented [DK19]: Agreed.

PROP5B, PROP6B	63.2520(e) and subparagraphs	OP-REQ3 only listed 63.2520(e)(11), (e)(12), and (e)(14) but I believe there are other subparagraphs that will apply so I added them too. Also added [G] notation to (e)(11) and (e)(14).
B93P5H510	63.998(c)(2)(iii)	OP-REQ3 showed this as removed. I kept it for now since I could not see where it was superseded by a newer citation or why it wouldn't apply.
B93P5CT1	63.2520(e)(16)	OP-REQ3 showed this as added in reporting, but does not exist. Assumed it was supposed to be 63.2520(e)(16) so I added that with [G] notation. Also added other subparagraphs of 63.2520(e) that I believe would apply.
PROP5B, PROP6B	63.983(a)(3), (a)(3)(i); [G]63.983(b)(4); 63.983(a)(3)(ii)	OP-REQ3 did not include these bypass citations even though other bypass citations (63.999(c)(2)(ii)-(iii); 63.2520(e)(12)) were included. I added these.
PROP5B, PROP6B	63.2450(g)(6)	OP-REQ3 had in testing only, but had in both testing and standards for other units. I put in both categories here for consistency.
PROP6A	63.2520(e)(5)(iv)	OP-REQ3 shows this as removed. However, this citation relates to question G2/<1000 LB/YR on UA-60, Table 5a which is currently answered Yes. If citation should be removed, update answer to No.
PROP6A	Batch process vent requirements (Table 6a-f of UA-60)	PROP6A has two sets of citations - general MCPU requirements from Tables 5a-c of UA-60 and batch process vent requirements from Tables 6a-f of UA-60. OP-REQ3 listed modifications to the general MCPU set of requirements, which I made. Do the batch process vent requirements also need updates?
B93P5F1 (index 63FFFF-01 and 63FFFF-02); B93P5H510, B93P5LR1, B93P5LR2, B93P5LR3, B93P5ST816, B93P6H510, GRP-TANK1, GRP-TANK2, GRP-TANK3	63.2520(e)	For these units, only 63.2520(e) was listed, so I added the [G] notation since it has subparagraphs.

Commented [DK20]: Agreed.

Commented [DK21]: Furnaces are exempt as vent stream is introduced with primary fuel. Please remove 63.998(c)(2)(iii)

Commented [DK22]: Agreed

Commented [DK23]: Agreed

Commented [DK24]: Agreed

Commented [DK25]: Please keep this citation.

Commented [KD(26)]: PROP6A in batch process vents requirements can be deleted. It was inadvertently added in last renewal. Batch requirement applies to PROP6B.

Commented [KD(27)]: Agreed

Loading/Unloading Operations Attributes
Form OP-UA4 (Page 16)
Federal Operating Permit Program
Table 9a: Title 40 Code of Federal Regulations Part 63 (40 CFR Part 63)
Subpart FFFF: National Emission Standards for Hazardous Air Pollutants: Miscellaneous Organic Chemical Manufacturing
Texas Commission on Environmental Quality

Date	Permit No.:	Regulated Entity No.
04/19/2024	O3905	RN100225945

Unit ID No.	SOP Index No.	Emission Standard	Designated HAL	Determined HAL	Prior Eval	Assessment Waiver	Negative Pressure	Bypass Line
B93P5LR3	63FFFF-01	FLR	NO	NO	NO	NO	NO	NO

Emission Point/Stationary Vent/Distillation Operation Vent/Process Vent Attributes
Form OP-UA15 (Page 35)

Federal Operating Permit Program

Table 13d: Title 40 Code of Federal Regulations Part 63 (40 CFR Part 63)
Subpart FFFF: National Emission Standards for Hazardous Air Pollutants:
Miscellaneous Organic Chemical Manufacturing - Continuous Process Vents
Texas Commission on Environmental Quality

Date	Permit No.	Regulated Entity No.
04/19/2024	03905	RN100225945

Emission Point ID No.	SOP Index No.	Designated GRP1	Designated HAL	Determined HAL	Prior Eval	Assessment Waiver	Assessment Waiver ID	Negative Pressure	Bypass Line
B93P6DU713	63FFFF-01	YES	NO	NO	NO	NO		NO	CARSEAL

**Emission Point/Stationary Vent/Distillation Operation Vent/Process Vent Attributes
Form OP-UA15 (Page 32)**

Federal Operating Permit Program

**Table 13a: Title 40 Code of Federal Regulations Part 63 (40 CFR Part 63)
Subpart FFFF: National Emission Standards for Hazardous Air Pollutants:
Miscellaneous Organic Chemical Manufacturing - Continuous Process Vents
Texas Commission on Environmental Quality**

Date	Permit No.	Regulated Entity No.
04/19/2024	03905	RN100225945

Emission Point ID No.	SOP Index No.	Emission Standard	Comb Device	95% Scrubber	PERF Test	Negative Pressure	Bypass Line
B93P6DU713	63FFFF-01	BLWFLR					

Permit By Rule Supplemental Table (Page 1)
Table A: Registered Permits by Rule (30 TAC Chapter 106) for the Application Area
Texas Commission on Environmental Quality

Date	Permit Number	Regulated Entity Number
04/19/2024	03905	RN100225945

Unit ID No.	Registration No.	PBR No.	Registration Date
B27P3VSDC, B27P3V501, B27P3V502, B37SB201, B37SB202, B37SB203, B37SB204, B37SB205, B37SB206, B37SB207, B37SB208, B37SB901, B37SB902	71088	106.261/11/01/2003 106.262/11/01/2003	3/1/2004
B27P3FU1 B27P3FU2	148641	106.261/11/01/2003	11/3/2017
B27P3F1, B27P3FU1	149252	106.261/11/01/2003	11/21/2017
B27P3FU1	149390	106.261/11/01/2003	12/8/2017
B27P3FU1 B27P3FU2	150600	106.262/11/01/2003	3/28/2018
B27P3F1, B27P3LR1	152016	106.261/11/01/2003 106.262/11/01/2003	7/11/2018
B27P3FU1 B27P3FU3	153912	106.261/11/01/2003 106.262/11/01/2003	11/16/2018
B27P3FU3	154148	106.262/11/01/2003	1/11/2019
B37P3PLF372	155071	106.264/09/04/2000	2/22/2019
B27P3FU1 B27P3FU3	156026	106.261/11/01/2003	3/29/2019

Permit By Rule Supplemental Table (Page 1)
Table A: Registered Permits by Rule (30 TAC Chapter 106) for the Application Area
Texas Commission on Environmental Quality

Date	Permit Number	Regulated Entity Number
04/19/2024	03905	RN100225945

Unit ID No.	Registration No.	PBR No.	Registration Date
B27P3FU1 B27P3FU3	156330	106.262/11/01/2003	4/29/2019
B27P3FU1	156390	106.261/11/01/2003 106.262/11/01/2003	5/1/2019
B27P3FU2	157619	106.262/11/01/2003	7/31/2019
B27P3FU1	158566	106.262/11/01/2003	10/23/2019
B27P3FU3	159019	106.261/11/01/2003 106.262/11/01/2003	12/9/2019
B27P3FU1, B27P3FU2, B27P3FU3	159735	106.261/11/01/2003 106.262/11/01/2003	4/17/2020
B27P3FU1	165806	106.262/11/01/2003	7/23/2021
B27P3FU1, B27P3FU2	168120	106.261/11/01/2003 106.262/11/01/2003	3/7/2022
B27P3FU1	168877	106.262/11/01/2003	4/28/2022

Permit By Rule Supplemental Table (Page 1)
Table A: Registered Permits by Rule (30 TAC Chapter 106) for the Application Area
Texas Commission on Environmental Quality

Date	Permit Number	Regulated Entity Number
04/19/2024	03905	RN100225945

Unit ID No.	Registration No.	PBR No.	Registration Date
B41P4FU1	164273	106.261/11/01/2003	2/22/2021
B41P4ST32, B41P4ST33	165104	106.264/09/04/2000	5/20/2021
B41P4SP2	166379	106.264/09/04/2000	9/10/2021
B41P4FU1	169965	106.261/11/01/2003	8/15/2022
B93P5F1	155873	106.261/11/01/2003 106.262/11/01/2003	4/4/2019
B93P5FU1, B93P5FU2	156764	106.261/11/01/2003 106.262/11/01/2003	6/10/2019
B93P5FU1, B93P5ST515	161815	106.261/11/01/2003 106.262/11/01/2003 106.264/09/04/2000	7/30/2020
B93P5FU1	162477	106.261/11/01/2003 106.262/11/01/2003	9/6/2020
B93P5FU1	163390	106.261/11/01/2003 106.262/11/01/2003	12/16/2020
B93P5FU1, B93P5FU2	166920	106.261/11/01/2003 106.262/11/01/2003	11/16/2021

Permit By Rule Supplemental Table (Page 1)
Table A: Registered Permits by Rule (30 TAC Chapter 106) for the Application Area
Texas Commission on Environmental Quality

Date	Permit Number	Regulated Entity Number
04/19/2024	03905	RN100225945

Unit ID No.	Registration No.	PBR No.	Registration Date
B93P6D5401, B93P6D5402, B93P6D6402	153040	106.261/11/01/2003	10/12/2018
B93P6PV931, B93P6PV941, B93P6PV971	155946	106.262/11/01/2003	03/20/2019
B93P5ST806, B93P5ST807	158187	106.261/11/01/2003 106.262/11/01/2003	09/26/2019
B93P6PV639	160055	106.261/11/01/2003 106.262/11/01/2003 106.263/11/01/2001	03/03/2021
B93P6FU3	164364	106.261/11/01/2003	3/26/2021
B93P6FU3	168422	106.261/11/01/2003	4/6/2022

Permit By Rule Supplemental Table (Page 2)
Table B: Claimed (not registered) Permits by Rule (30 TAC Chapter 106) for the Application Area
Texas Commission on Environmental Quality

Date	Permit Number	Regulated Entity Number
04/19/2024	03905	RN100225945

Unit ID No.	PBR No.	Version No./Date
B93SBMB01	106.452	09/04/2000
B93P5SC1	106.454	11/01/2001
B27P3SC01	106.454	07/08/1998
B41P4SC01	106.454	07/08/1998
B41P3ST444	106.476	09/04/2000
B27P3BT2600	106.472	09/04/2000

Permit By Rule Supplemental Table (Page 3)
Table C: Claimed (not registered) Permits by Rule (30 TAC Chapter 106) for Insignificant Sources for the Application Area
Texas Commission on Environmental Quality

Date	Permit Number	Regulated Entity Number
04/19/2024	03905	RN100225945

PBR No.	Version No./Date
106.452	09/04/2000
106.454	11/01/2001
106.454	07/08/1998
106.454	07/08/1998
106.476	09/04/2000
106.472	09/04/2000

Permit By Rule Supplemental Table (Page 4)
Table D: Monitoring Requirements for registered and claimed PBRs for the Application Area
Texas Commission on Environmental Quality

Date	Permit Number	Regulated Entity Number
04/19/2024	03905	RN100225945

Unit ID No.	PBR No.	Version No./Date Or Registration No.	Monitoring Requirement
B27P3VSDC, B27P3V501, B27P3V502, B37SB201, B37SB202, B37SB203, B37SB204, B37SB205, B37SB206, B37SB207, B37SB208, B37SB901, B37SB902	106.261/11/01/2003 106.262/11/01/2003	71088	C Train Production records.
B27P3FU1 B27P3FU2	106.261/11/01/2003	148641	28VHP LDAR Monitoring
B27P3F1, B27P3FU1	106.261/11/01/2003	149252	Flare Flow monitoring and 28VHP LDAR Monitoring
B27P3FU1	106.261/11/01/2003	149390	28VHP LDAR Monitoring
B27P3FU1 B27P3FU2	106.262/11/01/2003	150600	28VHP LDAR Monitoring
B27P3F1, B27P3LR1	106.261/11/01/2003 106.262/11/01/2003	152016	Flare Flow monitoring and loading throughout
B27P3FU1 B27P3FU3	106.261/11/01/2003 106.262/11/01/2003	153912	28VHP LDAR Monitoring
B27P3FU3	106.262/11/01/2003	154148	28VHP LDAR Monitoring
B37P3PLF372	106.264/09/04/2000	155071	Like for Like replacement
B27P3FU1 B27P3FU3	106.261/11/01/2003	156026	28VHP LDAR Monitoring

Permit By Rule Supplemental Table (Page 4)
Table D: Monitoring Requirements for registered and claimed PBRs for the Application Area
Texas Commission on Environmental Quality

Date	Permit Number	Regulated Entity Number
04/19/2024	03905	RN100225945

Unit ID No.	PBR No.	Version No./Date Or Registration No.	Monitoring Requirement
B27P3FU1 B27P3FU3	106.262/11/01/2003	156330	28VHP LDAR Monitoring
B27P3FU1	106.261/11/01/2003 106.262/11/01/2003	156390	28VHP LDAR Monitoring
B27P3FU2	106.262/11/01/2003	157619	28VHP LDAR Monitoring
B27P3FU1	106.262/11/01/2003	158566	28VHP LDAR Monitoring
B27P3FU3	106.261/11/01/2003 106.262/11/01/2003	159019	28VHP LDAR Monitoring
B27P3FU1, B27P3FU2, B27P3FU3	106.261/11/01/2003 106.262/11/01/2003	159735	28VHP LDAR Monitoring
B27P3FU1	106.262/11/01/2003	165806	28VHP LDAR Monitoring
B27P3FU1, B27P3FU2	106.261/11/01/2003 106.262/11/01/2003	168120	28VHP LDAR Monitoring
B27P3FU1	106.262/11/01/2003	168877	28VHP LDAR Monitoring

Permit By Rule Supplemental Table (Page 4)
Table D: Monitoring Requirements for registered and claimed PBRs for the Application Area
Texas Commission on Environmental Quality

Date	Permit Number	Regulated Entity Number
04/19/2024	03905	RN100225945

Unit ID No.	PBR No.	Version No./Date Or Registration No.	Monitoring Requirement
B41P4FU1	106.261/11/01/2003	164273	28VHP LDAR Monitoring
B41P4ST32, B41P4ST33	106.264/09/04/2000	165104	Tank Throughput records
B41P4SP2	106.264/09/04/2000	166379	Train 2 production records
B41P4FU1	106.261/11/01/2003	169965	28VHP LDAR Monitoring
B93P5F1	106.261/11/01/2003 106.262/11/01/2003	155873	Flare flow monitoring
B93P5FU1, B93P5FU2	106.261/11/01/2003 106.262/11/01/2003	156764	28VHP LDAR Monitoring
B93P5FU1, B93P5ST515	106.261/11/01/2003 106.262/11/01/2003 106.264/09/04/2000	161815	28VHP LDAR Monitoring and Like for Like Replacement
B93P5FU1	106.261/11/01/2003 106.262/11/01/2003	162477	28VHP LDAR Monitoring
B93P5FU1	106.261/11/01/2003 106.262/11/01/2003	163390	28VHP LDAR Monitoring
B93P5FU1, B93P5FU2	106.261/11/01/2003 106.262/11/01/2003	166920	28VHP LDAR Monitoring

Permit By Rule Supplemental Table (Page 4)
Table D: Monitoring Requirements for registered and claimed PBRs for the Application Area
Texas Commission on Environmental Quality

Date	Permit Number	Regulated Entity Number
04/19/2024	03905	RN100225945

Unit ID No.	PBR No.	Version No./Date Or Registration No.	Monitoring Requirement
B93P6D5401, B93P6D5402, B93P6D6402	106.261/11/01/2003	153040	Records of bag transferred.
B93P6PV931, B93P6PV941, B93P6PV971	106.262/11/01/2003	155946	Record number of hours of operation.
B93P5ST806, B93P5ST807	106.261/11/01/2003 106.262/11/01/2003	158187	Records of Tank Throughput.
B93P6PV639	106.261/11/01/2003 106.262/11/01/2003 106.263/11/01/2001	160055	Vent air flow rate.
B93P6FU3	106.261/11/01/2003	164364	28VHP LDAR Monitoring
B93P6FU3	106.261/11/01/2003	168422	28VHP LDAR Monitoring
B93SBMB01	106.452/9/4/2000	6/22/2020	Records of blast media used
B93P5SC1	106.454/11/1/2001	5/22/2017	SDS of the solvent used
B27P3SC01	106.454/07/08/1998	08/23/2005	SDS of the solvent used
B41P4SC01	106.454/07/08/1998	08/23/2005	SDS of the solvent used
B41P3ST444	106.476/09/04/2000	08/23/2005	SDS of the material stored in tank

Permit By Rule Supplemental Table (Page 4)
Table D: Monitoring Requirements for registered and claimed PBRs for the Application Area
Texas Commission on Environmental Quality

Date	Permit Number	Regulated Entity Number
04/19/2024	03905	RN100225945

Unit ID No.	PBR No.	Version No./Date Or Registration No.	Monitoring Requirement
B27P3BT2600	106.472	09/04/2000	SDS of the material stored in tank. This tank does not store volatile organic compound (VOC).

From: Carolyn Maus
Sent: Wednesday, April 17, 2024 9:02 AM
To: Khan, Danish (D)
Subject: RE: Working Draft Permit -- FOP O3905/Project 35920, The Dow Chemical Company/Dow Texas Operations Freeport
Attachments: MACT FFFF Citation Issues.docx

Hi Danish,

Sorry about that! Yes, there should have been another attachment with regard to the MACT FFFF citations. I have attached it to this email.

-Carolyn

Carolyn Maus, P.E.
Air Permits Division
Texas Commission on Environmental Quality
P.O. Box 13087, MC 163
Austin, TX 78711
Phone: (512) 239-6204
Fax: (512) 239-1300



How are we doing? Fill out our online customer satisfaction survey
at www.tceq.texas.gov/customersurvey

From: Khan, Danish (D) <MDKhan@dow.com>
Sent: Tuesday, April 16, 2024 7:48 PM
To: Carolyn Maus <carolyn.maus@tceq.texas.gov>
Subject: RE: Working Draft Permit -- FOP O3905/Project 35920, The Dow Chemical Company/Dow Texas Operations Freeport

Carolyn, for no. 2 is there suppose to be MACT FFFF documentation attached to the email?

Thanks,
Danish

General Business

From: Carolyn Maus <carolyn.maus@tceq.texas.gov>
Sent: Saturday, April 6, 2024 12:01 AM
To: Khan, Danish (D) <MDKhan@dow.com>
Subject: Working Draft Permit -- FOP O3905/Project 35920, The Dow Chemical Company/Dow Texas Operations Freeport

Unit ID(s)	Citation	Change(s) Made in Permit
All units that had these citations on the OP-REQ3	63.2450(e)(4), 63.2450(e)(5), 63.2450(e)(6), 63.2450(v), 63.2470(f), 63.2525(l), 63.2525(m), 63.2525(p), 63.2525(q), 63.2525(r), 63.2520(e)(11), 63.2520(e)(14)	Added grouped notation [G].
All units that had this citation on the OP-REQ3	63.671	I moved to monitoring since it addresses that type of requirement.
All units that had this citation on the OP-REQ3	63.2450(k)(1)(ii)	Most units had this under monitoring, while two (B93P5H510, B93P6H510) had it under recordkeeping. I placed under both categories.
B93P5H510, B93P6H510, PROP3, PROP5A, PROP5B, PROP6A	63.2520(d)	Added grouped notation [G].
B27P3FU1, B27P3FU2, B27P3FU3, B93P6FU3	63.2520(d)(4) (row for pressure relief devices in gasp/vapor service)	Added grouped notation [G].
PROP5B, PROP6B	63.2535(m)	Added grouped notation [G].
PROP5B, PROP6B	63.670, 63.671	All other units whose flare citations were updated (e.g. removing 63.11(b) and MACT SS flare items) had these citations. I included for consistency.
B27P3FU1, B27P3FU2, B27P3FU3, GRP-FUG EMISS, B93P6FU3	63.2480(b)(7)	OP-REQ3 marked this for removal for all fugitive components. Does this mean that every single fugitive component in each unit is considered unsafe- or difficult-to-monitor? For now, I did not remove.
B27P3FU1, B27P3FU2, B27P3FU3, GRP-FUG EMISS, B93P6FU3	63.2480(f)(1)-(f)(4) (in the row for compressors)	OP-REQ3 added all of these to compressors. 63.2480(f)(1) relates to pumps in light liquid service. 63.2480(f)(2) relates to closed vent system/control device. 63.2480(f)(4) relates to MACT UU, irrelevant since units comply with MACT H. Only 63.2480(f)(3) was added.
B27P3FU1, B27P3FU2, B27P3FU3, GRP-FUG EMISS, B93P6FU3	63.181(c)	OP-REQ3 asked to remove this from all components. However, there are some components that still have visual inspection requirements -

		pumps in light liquid service, connectors in gas/vapor/light liquid service, agitators in gas/vapor/light liquid service, and components subject to 63.169. I did not remove it for those.
B27P3FU1, B27P3FU2, B27P3FU3, GRP-FUG EMISS, B93P6FU3	63.2520(e)(14) (in the row for pressure relief devices in gas/vapor service)	63.2520(e)(14) is for maintenance vents so I changed to [G]63.2520(e)(15). I believe there are additional subparagraphs that will apply so I added them too.
B27P3FU3	Row for connectors in gas/vapor and light liquid service	Unlike other fugitive units, this unit did not have a row for connectors in gas/vapor and light liquid service in the permit, so I didn't have anything to edit. If I need to add this component, just let me know.
B93P5F1 (both 63FFFF-01 and 63FFFF-02); B93P5DU713; B93P6DU713	63.115(d)(3)(iii)	OP-REQ3 showed this removed from other units but not these. I took out for now for consistency and because I didn't think this stream was halogenated.
B93P5F1 (both 63FFFF-01 and 63FFFF-02); B93P5DU713; B93P6DU713; B93P5LR1; B93P5LR2; B93P5LR3	[G]63.998(d)(1)	OP-REQ3 showed this as removed. It must remain because it pertains to closed vent system records.
B93P5F1 (both 63FFFF-01 and 63FFFF-02)	63.999(b)(5)	OP-REQ3 did not remove this citation for reporting using of alternative recordkeeping, but it did remove 63.999(c)(6)(iv) and 63.998(b)(5) which also relate to that. I removed 63.999(b)(5) for consistency.
B93P5F1 (both 63FFFF-01 and 63FFFF-02)	[G]63.999(d)(1)-(2)	OP-REQ3 did not remove these (related to requesting alternative monitoring) but for other units they were. I removed for consistency.
B93P5DU713, B93P6DU713	63.999(c)(1), 63.999(c)(2)(i), 63.999(c)(2)(iii)	OP-REQ3 showed these as removed but they are still needed for general closed vent system reporting and for the bypass.
B93P5LR1, B93P5LR2	63.999(c)(1), 63.999(c)(2)(i)	OP-REQ3 showed these as removed but they are still needed for general closed vent system reporting.
B93P5DU713, B93P6DU713	63.2520(e) and subparagraphs	OP-REQ3 only listed 63.2520(e)(11) and (e)(12), but I believe there are other subparagraphs that will apply so I added them too.

PROP5B, PROP6B	63.2520(e) and subparagraphs	OP-REQ3 only listed 63.2520(e)(11), (e)(12), and (e)(14) but I believe there are other subparagraphs that will apply so I added them too. Also added [G] notation to (e)(11) and (e)(14).
B93P5H510	63.998(c)(2)(iii)	OP-REQ3 showed this as removed. I kept it for now since I could not see where it was superseded by a newer citation or why it wouldn't apply.
B93P5CT1	63.2525(e)(16)	OP-REQ3 showed this as added in reporting, but does not exist. Assumed it was supposed to be 63.2520(e)(16) so I added that with [G] notation. Also added other subparagraphs of 63.2520(e) that I believe would apply.
PROP5B, PROP6B	63.983(a)(3), (a)(3)(i); [G]63.983(b)(4); 63.983(a)(3)(ii)	OP-REQ3 did not include these bypass citations even though other bypass citations (63.999(c)(2)(ii)-(iii); 63.2520(e)(12)) were included. I added these.
PROP5B, PROP6B	63.2450(g)(6)	OP-REQ3 had in testing only, but had in both testing and standards for other units. I put in both categories here for consistency.
PROP6A	63.2520(e)(5)(iv)	OP-REQ3 shows this as removed. However, this citation relates to question G2/<1000 LB/YR on UA-60, Table 5a which is currently answered Yes. If citation should be removed, update answer to No.
PROP6A	Batch process vent requirements (Table 6a-f of UA-60)	PROP6A has two sets of citations - general MCPU requirements from Tables 5a-c of UA-60 and batch process vent requirements from Tables 6a-f of UA-60. OP-REQ3 listed modifications to the general MCPU set of requirements, which I made. Do the batch process vent requirements also need updates?
B93P5F1 (index 63FFFF-01 and 63FFFF-02); B93P5H510, B93P5LR1, B93P5LR2, B93P5LR3, B93P5ST816, B93P6H510, GRP-TANK1, GRP-TANK2, GRP-TANK3	63.2520(e)	For these units, only 63.2520(e) was listed, so I added the [G] notation since it has subparagraphs.

From: Khan, Danish (D) <MDKhan@dow.com>
Sent: Tuesday, April 16, 2024 7:48 PM
To: Carolyn Maus
Subject: RE: Working Draft Permit -- FOP O3905/Project 35920, The Dow Chemical Company/Dow Texas Operations Freeport

Carolyn, for no. 2 is there suppose to be MACT FFFF documentation attached to the email?

Thanks,
Danish

General Business

From: Carolyn Maus <carolyn.maus@tceq.texas.gov>
Sent: Saturday, April 6, 2024 12:01 AM
To: Khan, Danish (D) <MDKhan@dow.com>
Subject: Working Draft Permit -- FOP O3905/Project 35920, The Dow Chemical Company/Dow Texas Operations Freeport

You don't often get email from carolyn.maus@tceq.texas.gov. [Learn why this is important](#)

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Good afternoon,

I have conducted a technical review of the minor revision application for The Dow Chemical Company, Dow Texas Operations Freeport, Polyethylene area. An electronic copy of the Working Draft Permit (WDP) is attached for your review. This WDP contains the TCEQ determination of applicable requirements based on the information submitted in your application, and any updates provided. I made all changes requested on Form OP-2.

Please review the WDP and submit to me any comments you have on the working draft permit by **Friday, April 19, 2024**. Please submit a written response by this deadline, even if you are not making any comments on the content of the WDP.

In addition, I have a few questions and corrections for the application material. **Please provide a response to these items with your WDP comments.**

- 1) The OP-PBRSUP was submitted with only the new tank under 106.472. This form is unlike the rest of our forms – it cannot be submitted partially (meaning only containing changes for a given project). Instead, you have to keep the complete copy (addressing all PBRs used in the permit area) and you need to edit that complete copy and re-submit when there are changes. Therefore, please re-submit the previous full copy of the form with this new tank added on to it, and re-date all tables.

- 2) MACT FFFF citation updates: I have made most of the citation updates that were indicated on the OP-REQ3. There were also some citations where I added the [G] grouping notation since the citation has subparagraphs that appeared to apply, there were a few citation categories that I adjusted for consistency among units, and then there were some changes I did not make because I still had questions or they seemed erroneous. The attached document MACT FFFF Citation Issues describes any place where I differed from your OP-REQ3. Please review those items and address my questions.
- 3) For unit B93P6DU713, I updated the citations based on the OP-REQ3, and I understand that not all those changes are part of our flowchart yet. However, some of the changes were not due to the amendment but rather to a correction needed for the vent's attributes (such as changing from Group 2 to Group 1). Therefore, please update Tables 13a-13g of UA-15 so that we have accurate attributes.
- 4) For unit B93P5LR3, please fill out the MACT FFFF tables on OP-UA04.

Please review the second portion of the "SOP Technical Review Fact Sheet" located at http://www.tceq.texas.gov/assets/public/permitting/air/Guidance/Title_V/sop_wdp_factsheet.pdf. This guidance contains important information regarding WDP review and comment procedures.

Note that a Certification by Responsible Official (Form OP-CRO1) for any uncertified application information, including application updates supporting the WDP comments, is required. After final review of the WDP, additional changes supported by application updates may require certification. I will advise you of these changes at a later date. Prior to transmittal of the Public Notice/Announcement Authorization Package, a duly signed OP-CRO1 form may be required which includes the specific dates or time-period of all submitted application documentation that was not previously certified. I will advise you of this requirement prior to sending the Public Notice/Announcement Authorization.

Application updates may now be submitted through Title V STEERS. Any application updates that are submitted by the RO/DAR through STEERS are certified and do not require the submittal of an original signature OP-CRO1. Application updates that are provided through email or physical mail require certification using an original signature OP-CRO1.

Please notify me when these updates have been submitted.

As required on Form OP-1, question IV.D, please remember the FOP application and all application updates must be submitted to EPA Region 6 at R6AirPermitsTX@epa.gov and to the TCEQ regional office having jurisdiction. This submittal information can be found on our website at [Where to Submit FOP Applications and Permit-Related Documents](#).

Contact me if you have any questions regarding the guidelines, the project schedule, or any other details regarding your application or permit.

Thank you for your cooperation.

Sincerely,

Carolyn Maus, P.E.
Air Permits Division
Texas Commission on Environmental Quality
P.O. Box 13087, MC 163
Austin, TX 78711
Phone: (512) 239-6204
Fax: (512) 239-1300



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From: Carolyn Maus
Sent: Wednesday, November 29, 2023 8:59 PM
To: MDKhan@dow.com
Subject: Technical Review -- FOP O3905/Project 35920, The Dow Chemical Company/Dow Texas Operations Freeport

Good evening,

I have been assigned to the Federal Operating Permit (FOP) minor revision application of Permit No. O3905 for The Dow Chemical Company, Dow Texas Operations Freeport, Polyethylene area. This application has been assigned Project No. 35920. Please address all correspondence pertaining to this permit application, including any updates, to me at the address in my email signature, and use both the Permit and Project reference numbers above to facilitate tracking. I have begun technical review and will inform you if I have further questions or need any updated forms.

In addition, I wanted to let you know that EPA has, on occasion, objected to Title V permits based on the following:

- a. NSR permit and PBR monitoring sufficiency –please refer to our periodic monitoring guidance for reference of monitoring that EPA has, so far, considered sufficient.
- b. Reference to confidential business information (CBI) in NSR permits and PBR submittals.
- c. High level terms in the SOP Applicable Requirement Summary Table. The high level terms are sometimes used in SOPs when unit attribute forms have not yet been updated due to regulatory amendments.
- d. Accuracy of PBR information provided on the supplemental table and in the permit – please refer to Forms OP-PBRSUP and OP-REQ1 Instructions.

If you have any questions or concerns on any of these items or think you need to do any additional updates, let me know and we can discuss further.

Application updates may now be submitted through Title V STEERS. Any application updates that are submitted by the RO/DAR through STEERS are certified and do not require the submittal of an original signature OP-CRO1. Application updates that are provided through email or physical mail require certification using an original signature OP-CRO1. This form will be requested at a later date.

If you choose to submit your application updates through STEERS, please notify me when these updates have been submitted.

Please review the “SOP Technical Review Fact Sheet” located at http://www.tceq.texas.gov/assets/public/permitting/air/Guidance/Title_V/sop_wdp_factsheet.pdf. This guidance contains important information regarding the review process and application update procedures. Contact me if you have any questions regarding the guidelines, the project schedule, or any other details regarding your application or permit.

Thank you for your cooperation.

Sincerely,

Carolyn Maus, P.E.
Air Permits Division

Texas Commission on Environmental Quality
P.O. Box 13087, MC 163
Austin, TX 78711
Phone: (512) 239-6204
Fax: (512) 239-1400



How are we doing? Fill out our online customer satisfaction survey
at www.tceq.texas.gov/customersurvey

Texas Commission on Environmental Quality

Title V Existing

3905

Site Information (Regulated Entity)

What is the name of the permit area to be authorized?	POLYETHYLENE
Does the site have a physical address?	Yes
Physical Address	
Number and Street	2301 N BRAZOSPORT BLVD
City	FREEPORT
State	TX
ZIP	77541
County	BRAZORIA
Latitude (N) (##.#####)	28.9825
Longitude (W) (-###.#####)	95.352777
Primary SIC Code	2869
Secondary SIC Code	
Primary NAICS Code	325199
Secondary NAICS Code	
Regulated Entity Site Information	
What is the Regulated Entity's Number (RN)?	RN100225945
What is the name of the Regulated Entity (RE)?	DOW TEXAS OPERATIONS FREEPORT
Does the RE site have a physical address?	Yes
Physical Address	
Number and Street	2301 N BRAZOSPORT BLVD
City	FREEPORT
State	TX
ZIP	77541
County	BRAZORIA
Latitude (N) (##.#####)	28.9825
Longitude (W) (-###.#####)	-95.352777
Facility NAICS Code	
What is the primary business of this entity?	INDUSTRIAL CHEMICAL MANUFACTURING PLANT

Customer (Applicant) Information

How is this applicant associated with this site?	Owner Operator
What is the applicant's Customer Number (CN)?	CN600356976
Type of Customer	Corporation
Full legal name of the applicant:	
Legal Name	The Dow Chemical Company
Texas SOS Filing Number	1216206
Federal Tax ID	381285128
State Franchise Tax ID	13812851288
State Sales Tax ID	
Local Tax ID	
DUNS Number	84970516
Number of Employees	251-500
Independently Owned and Operated?	

Responsible Official Contact

Person TCEQ should contact for questions about this application:	
Organization Name	THE DOW CHEMICAL COMPANY
Prefix	MR
First	JOHN
Middle	
Last	SAMPSON
Suffix	
Credentials	
Title	SENIOR VP
Enter new address or copy one from list:	
Mailing Address	
Address Type	Domestic
Mailing Address (include Suite or Bldg. here, if applicable)	2301 N BRAZOSPORT BLVD
Routing (such as Mail Code, Dept., or Attn:)	
City	FREEPORT
State	TX
ZIP	77541

Phone (###-###-####)

9792389877

Extension

Alternate Phone (###-###-####)

Fax (###-###-####)

9792358116

E-mail

txles@dow.com

Duly Authorized Representative Contact

Person TCEQ should contact for questions about this application

Select existing DAR contact or enter a new contact.

FRAN FALCON(THE DOW CHEMICA...)

Organization Name

THE DOW CHEMICAL COMPANY

Prefix

MS

First

FRAN

Middle

Last

FALCON

Suffix

Credentials

Title

EH&S REGIONAL LEVERAGED DELIVERY DIRECTOR

Enter new address or copy one from list

Mailing Address

Address Type

Domestic

Mailing Address (include Suite or Bldg. here, if applicable)

332 HIGHWAY 332 E

Routing (such as Mail Code, Dept., or Attn:)

TXINN-APB

City

LAKE JACKSON

State

TX

Zip

77566

Phone (###-###-####)

9792389978

Extension

Alternate Phone (###-###-####)

Fax (###-###-####)

9792358117

E-mail

FQFalcon@dow.com

Technical Contact

Person TCEQ should contact for questions about this application:

Select existing TC contact or enter a new contact.

Organization Name

Prefix

First

Middle

Last

Suffix

Credentials

Title

Enter new address or copy one from list:

Mailing Address

Address Type

Mailing Address (include Suite or Bldg. here, if applicable)

Routing (such as Mail Code, Dept., or Attn:)

City

State

ZIP

Phone (###-###-####)

Extension

Alternate Phone (###-###-####)

Fax (###-###-####)

E-mail

DANISH KHAN(THE DOW CHEMICA...)

THE DOW CHEMICAL COMPANY

MR.

DANISH

KHAN

AIR PERMIT MANAGER

Domestic

332 HIGHWAY 332 E

LAKE JACKSON

TX

77566

9792381037

mdkhan@dow.com

Title V General Information - Existing

1) Permit Type:

SOP

2) Permit Latitude Coordinate:

28 Deg 58 Min 57 Sec

3) Permit Longitude Coordinate:

95 Deg 21 Min 10 Sec

4) Is this submittal a new application or an update to an existing application?

New Application

4.1. What type of permitting action are you applying for?

Streamlined Revision

4.1.1. Are there any permits that should be voided upon issuance of this permit application through permit conversion?

No

4.1.2. Are there any permits that should be voided upon issuance of this permit application through permit consolidation?

No

5) Who will electronically sign this Title V application?

Duly Authorized Representative

6) Does this application include Acid Rain Program or Cross-State Air Pollution Rule requirements?

No

Title V Attachments Existing

Attach OP-1 (Site Information Summary)

[File Properties]

File Name

[OP-1.pdf](/ePermitsExternal/faces/file?fileId=170947)

Hash

38578E7C1F580D5503B10C7AAAFB20989BAA53C35A00DEA7075B17F98CEA3E2F

MIME-Type

application/pdf

Attach OP-2 (Application for Permit Revision/Renewal)

[File Properties]

File Name

[OP-2.pdf](/ePermitsExternal/faces/file?fileId=170934)

Hash

1E515CE286107DA8291B4154EDBD12C45F503A1F66C287EDC40B0FB6368CF114

MIME-Type

application/pdf

Attach OP-REQ1 (Application Area-Wide Applicability Determinations and General Information)

[File Properties]

File Name

[OP-REQ1_Pg_3_4.pdf](/ePermitsExternal/faces/file?fileId=170935)

Hash

2D4480A101D61FECDD34AF1C72577A5D7CA2985E8CB37211736B128A17EFE15C8

MIME-Type

application/pdf

Attach OP-REQ2 (Negative Applicable Requirement Determinations)

Attach OP-REQ3 (Applicable Requirements Summary)

[File Properties]

File Name

[OP-REQ3.pdf](/ePermitsExternal/faces/file?fileId=170936)

Hash

1C2D2311A6418077D3BCBC633D0D83C8711A0B5015296CE85355C42658CDF792

MIME-Type

application/pdf

Attach OP-PBRSUP (Permits by Rule Supplemental Table)

[File Properties]

File Name

[OP-PBRSUP.pdf](/ePermitsExternal/faces/file?fileId=170937)

Hash	BC86B0B6CC5A92EC4CDDF1E4A6C81A42A69244549478460BB35031B1CDEFFCAB
MIME-Type	application/pdf
Attach OP-SUMR (Individual Unit Summary for Revisions)	
[File Properties]	
File Name	OP-SUMR.pdf
Hash	DD7166B83131014CD5DA39BB5D4FE28E57660F5B99436F7004F3799AADD4FB
MIME-Type	application/pdf
Attach OP-MON (Monitoring Requirements)	
Attach OP-UA (Unit Attribute) Forms	
[File Properties]	
File Name	OP-UA12.pdf
Hash	CC345C40659F1E9F08DE6031BAFF62D20C1DA5D4A63D71EA1FED132C4819D2DA
MIME-Type	application/pdf
[File Properties]	
File Name	OP-UA28.pdf
Hash	A35E9400AA381982422EAD0C15E3DA6B83B304B6450DA8DC7AB74A66BEE426C8
MIME-Type	application/pdf
If applicable, attach OP-AR1 (Acid Rain Permit Application)	
Attach OP-CRO2 (Change of Responsible Official Information)	
Attach OP-DEL (Delegation of Responsible Official)	
Attach any other necessary information needed to complete the permit.	
[File Properties]	
File Name	O3905_Min_Rev__Application_CL.pdf
Hash	4BF2AE31197685DEEAC36E532F9AADEB702ECF8B27E8E98345FB701621378301
MIME-Type	application/pdf
An additional space to attach any other necessary information needed to complete the permit.	

Expedite Title V

1) Per Texas Health and Safety Code, Section 382.05155, does the applicant want to expedite the processing of this application?

No

Certification

I certify that I am the Duly Authorized Representative for this application and that, based on information and belief formed after reasonable inquiry, the statements and information on this form are true, accurate, and complete.

1. I am Fran Q Falcon, the owner of the STEERS account ER028176.
2. I have the authority to sign this data on behalf of the applicant named above.
3. I have personally examined the foregoing and am familiar with its content and the content of any attachments, and based upon my personal knowledge and/or inquiry of any individual responsible for information contained herein, that this information is true, accurate, and complete.
4. I further certify that I have not violated any term in my TCEQ STEERS participation agreement and that I have no reason to believe that the confidentiality or use of my password has been compromised at any time.
5. I understand that use of my password constitutes an electronic signature legally equivalent to my written signature.
6. I also understand that the attestations of fact contained herein pertain to the implementation, oversight and enforcement of a state and/or federal environmental program and must be true and complete to the best of my knowledge.
7. I am aware that criminal penalties may be imposed for statements or omissions that I know or have reason to believe are untrue or misleading.
8. I am knowingly and intentionally signing Title V Existing 3905.
9. My signature indicates that I am in agreement with the information on this form, and authorize its submittal to the TCEQ.

OWNER OPERATOR Signature: Fran Q Falcon OWNER OPERATOR

Account Number:	ER028176
Signature IP Address:	165.225.32.90
Signature Date:	2023-11-02
Signature Hash:	80A3533D44DE24C165D8ACFA6462AF282D76C27E4CCA371E3E66B7ED9C16C9B2
Form Hash Code at time of Signature:	25B00371D3E6275648256D860E7AC1D7B909C92DB7C1E8BD1CF5ECDF56FC6486

Submission

Reference Number:	The application reference number is 602468
Submitted by:	The application was submitted by ER028176/Fran Q Falcon
Submitted Timestamp:	The application was submitted on 2023-11-02 at 17:50:03 CDT

Submitted From:

Confirmation Number:

Steers Version:

Permit Number:

The application was submitted from IP address 165.225.32.90

The confirmation number is 498582

The STEERS version is 6.70

The permit number is 3905

Additional Information

Application Creator: This account was created by Muhammad Danish Khan



November 2, 2023

Submitted via STEERS

Mr. Johnny Bowers, Team Leader
Air Permits Initial Review Team (APIRT), **MC-161**
P.O. Box 13087
Austin, TX 78711-3087

The Dow Chemical Company CN600356976
Dow Texas Operations Freeport RN100225945
Title V Permit # 03905 - Polyethylene
Title V Permit 03905 Minor Revision Application

Dear Mr. Bowers:

The Dow Chemical Company is submitting minor revision application for Title V Operating Permit 03905, Polyethylene at Dow Texas Operations. Dow is requesting several minor revisions related to current rule updates for 40 CFR Part 63, Subpart FFFF and three other minor revision with detailed explanation in OP-2. Forms OP-2, OP-SUMR, OP-REQ1, OP-REQ3, OP-UAs and OP-PBRSUP are being submitted with this application via STEERS. Texas. This minor revision application is submitted in accordance with 30 TAC Chapter 122, Subchapter, C §122.215 – §122.217.

Should there be any questions regarding this submittal, I can be contacted at (979) 238-1037 or via e-mail at MDKhan@dow.com.

Sincerely,

A handwritten signature in blue ink that reads "Danish Khan".

Danish Khan
EH&S Regional Delivery Manager

XC: TCEQ Air Section Manager

TCEQ Air Program
5425 Polk Avenue, Suite H,
Houston, TX 77023-1486

Environmental Health Director

Brazoria County Health Department,
jodie@brazoria-county.com

Environmental Protection Agency
Air Permits Section (6PD-R)

R6airpermitsTX@epa.gov

Email

Betsy Farkas

Ericka Thomas

Jameica Harrell

Sherrie Solis

Fran Falcon

Kyle Rhodes

Danish Khan

**Federal Operating Permit Program
Site Information Summary
Form OP-1 (Page 1)
Texas Commission on Environmental Quality**

Please print or type all information. Direct any questions regarding this application form to the Air Permits Division at (512) 239-1250 or to the Texas Commission on Environmental Quality, Office of Air, Air Permits Division (MC 163), P.O. Box 13087, Austin, Texas 78711-3087.

I. Company Identifying Information
A. Company Name: The Dow Chemical Company
B. Customer Reference Number (CN): CN600356976
C. Submittal Date (mm/dd/yyyy): 11/02/2023
II. Site Information
A. Site Name: Dow Texas Operations - Polyethylene
B. Regulated Entity Reference Number (RN): RN100225945
C. Indicate affected state(s) required to review permit application: <i>(Check the appropriate box[es].)</i>
<input type="checkbox"/> AR <input type="checkbox"/> CO <input type="checkbox"/> KS <input type="checkbox"/> LA <input type="checkbox"/> NM <input type="checkbox"/> OK <input checked="" type="checkbox"/> N/A
D. Indicate all pollutants for which the site is a major source based on the site's potential to emit: <i>(Check the appropriate box[es].)</i>
<input checked="" type="checkbox"/> VOC <input checked="" type="checkbox"/> NO _x <input checked="" type="checkbox"/> SO ₂ <input checked="" type="checkbox"/> PM ₁₀ <input checked="" type="checkbox"/> CO <input type="checkbox"/> Pb <input checked="" type="checkbox"/> HAPS
Other:
E. Is the site a non-major source subject to the Federal Operating Permit Program? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
F. Is the site within a local program area jurisdiction? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
G. Will emissions averaging be used to comply with any Subpart of 40 CFR Part 63? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
H. Indicate the 40 CFR Part 63 Subpart(s) that will use emissions averaging:
III. Permit Type
A. Type of Permit Requested: <i>(Select only one response)</i>
<input checked="" type="checkbox"/> Site Operating Permit (SOP) <input type="checkbox"/> Temporary Operating Permit (TOP) <input type="checkbox"/> General Operating Permit (GOP)

**Federal Operating Permit Program
Site Information Summary
Form OP-1 (Page 2)
Texas Commission on Environmental Quality**

IV. Initial Application Information <i>(Complete for Initial Issuance Applications Only.)</i>
A. Is this submittal an abbreviated or a full application? <input type="checkbox"/> Abbreviated <input type="checkbox"/> Full
B. If this is a full application, is the submittal a follow-up to an abbreviated application? <input type="checkbox"/> YES <input type="checkbox"/> NO
C. If this is an abbreviated application, is this an early submittal for a combined SOP and Acid Rain permit? <input type="checkbox"/> YES <input type="checkbox"/> NO
D. Has an electronic copy of this application been submitted (or is being submitted) to EPA? (Refer to the form instructions for additional information.) <input type="checkbox"/> YES <input type="checkbox"/> NO
E. Has the required Public Involvement Plan been included with this application? <input type="checkbox"/> YES <input type="checkbox"/> NO
V. Confidential Information
A. Is confidential information submitted in conjunction with this application? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
VI. Responsible Official (RO) Identifying Information
RO Name Prefix: (<input checked="" type="checkbox"/> Mr. <input type="checkbox"/> Mrs. <input type="checkbox"/> Ms. <input type="checkbox"/> Dr.)
RO Full Name: John Sampson
RO Title: Senior VP
Employer Name: The Dow Chemical Company
Mailing Address: 2301 N Brazosport Blvd
City: Freeport
State: Texas
ZIP Code: 77541
Territory:
Country:
Foreign Postal Code:
Internal Mail Code:
Telephone No.: 979-238-9877
Fax No.:
Email: TXLES@dow.com

**Federal Operating Permit Program
Site Information Summary
Form OP-1 (Page 3)
Texas Commission on Environmental Quality**

VII. Technical Contact Identifying Information <i>(Complete if different from RO.)</i>
Technical Contact Name Prefix: (<input checked="" type="checkbox"/> Mr. <input type="checkbox"/> Mrs. <input type="checkbox"/> Ms. <input type="checkbox"/> Dr.)
Technical Contact Full Name: Danish Khan
Technical Contact Title: EH&S Regional Manager
Employer Name: The Dow Chemical Company
Mailing Address: 2301 N Brazosport Blvd
City: Freeport
State: Texas
ZIP Code: 77541
Territory:
Country:
Foreign Postal Code:
Internal Mail Code:
Telephone No.: 979-238-1037
Fax No.:
Email: MDKhan@dow.com
VIII. Reference Only Requirements <i>(For reference only.)</i>
A. State Senator:
B. State Representative:
C. Has the applicant paid emissions fees for the most recent agency fiscal year (Sept. 1 - August 31)? <input type="checkbox"/> YES <input type="checkbox"/> NO <input type="checkbox"/> N/A
D. Is the site subject to bilingual notice requirements pursuant to 30 TAC § 122.322? <input type="checkbox"/> YES <input type="checkbox"/> NO
E. Indicate the alternate language(s) in which public notice is required:

**Federal Operating Permit Program
Site Information Summary
Form OP-1 (Page 4)
Texas Commission on Environmental Quality**

IX. Off-Site Permit Request <i>(Optional for applicants requesting to hold the FOP and records at an off-site location.)</i>
A. Office/Facility Name:
B. Physical Address:
City:
State:
ZIP Code:
Territory:
Country:
Foreign Postal Code:
C. Physical Location:
D. Contact Name Prefix: (<input type="checkbox"/> Mr. <input type="checkbox"/> Mrs. <input type="checkbox"/> Ms. <input type="checkbox"/> Dr.)
Contact Full Name:
E. Telephone No.:
X. Application Area Information
A. Area Name: Dow Texas Operations – Polyethylene
B. Physical Address: 2301 N Brazosport Blvd
City: Freeport
State: Texas
ZIP Code: 77541
C. Physical Location:
2301 N Brazosport Blvd, Freeport, TX
D. Nearest City:
E. State:
F. ZIP Code:

**Federal Operating Permit Program
Site Information Summary
Form OP-1 (Page 5)
Texas Commission on Environmental Quality**

X. Application Area Information <i>(continued)</i>
G. Latitude (nearest second): 28.9825
H. Longitude (nearest second): -95.352777
I. Are there any emission units that were not in compliance with the applicable requirements identified in the application at the time of application submittal? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
J. Indicate the estimated number of emission units in the application area: 225
K. Are there any emission units in the application area subject to the Acid Rain Program? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
XI. Public Notice <i>(Complete this section for SOP Applications and Acid Rain Permit Applications only.)</i>
A. Name of a public place to view application and draft permit: Freeport Branch Library
B. Physical Address: 410 North Brazosport Blvd.
City: Freeport
ZIP Code: 77541
C. Contact Person (Someone who will answer questions from the public during the public notice period):
Contact Name Prefix: (<input checked="" type="checkbox"/> Mr. <input type="checkbox"/> Mrs. <input type="checkbox"/> Ms. <input type="checkbox"/> Dr.):
Contact Person Full Name: Danish Khan
Contact Mailing Address: 2301 N Brazosport Blvd
City: Freeport
State: Texas
ZIP Code: 77541
Territory:
Country:
Foreign Postal Code:
Internal Mail Code:
Telephone No.: 979-238-1037

**Federal Operating Permit Program
Site Information Summary
Form OP-1 (Page 6)
Texas Commission on Environmental Quality**

XII. Delinquent Fees and Penalties
Notice: This form will not be processed until all delinquent fees and/or penalties owed to the TCEQ or the Office of Attorney General on behalf of the TCEQ are paid in accordance with the "Delinquent Fee and Penalty Protocol."
Complete Sections XIII and XIV for Acid Rain Permit and CSAPR applications only. Please include a copy of the Certificate of Representation submitted to EPA.
XIII. Designated Representative (DR) Identifying Information
DR Name Prefix: (<input type="checkbox"/> Mr. <input type="checkbox"/> Mrs. <input type="checkbox"/> Ms. <input type="checkbox"/> Dr.)
DR Full Name:
DR Title:
Employer Name:
Mailing Address:
City:
State:
ZIP Code:
Territory:
Country:
Foreign Postal Code:
Internal Mail Code:
Telephone No.:
Fax No.:
Email:

**Federal Operating Permit Program
Site Information Summary
Form OP-1 (Page 7)
Texas Commission on Environmental Quality**

Complete Sections XIII and XIV for Acid Rain Permit and CSAPR applications only. Please include a copy of the Certificate of Representation submitted to EPA.

XIV. Alternate Designated Representative (ADR) Identifying Information

ADR Name Prefix: (☐ Mr. ☐ Mrs. ☐ Ms. ☐ Dr.)

ADR Full Name:

ADR Title:

Employer Name:

Mailing Address:

City:

State:

ZIP Code:

Territory:

Country:

Foreign Postal Code:

Internal Mail Code:

Telephone No.:

Fax No.:

Email:

**Federal Operating Permit Program
Application for Permit Revision/Renewal
Form OP-2-Table 1
Texas Commission on Environmental Quality**

Date: 11/02/2023	
Permit No.: 03905	
Regulated Entity No.: RN100225945	
Company Name: The Dow Chemical Company	
For Submissions to EPA	
Has an electronic copy of this application been submitted (or is being submitted) to EPA? <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO	
I. Application Type	
Indicate the type of application:	
<input type="checkbox"/> Renewal	
<input checked="" type="checkbox"/> Streamlined Revision (Must include provisional terms and conditions as explained in the instructions.)	
<input type="checkbox"/> Significant Revision	
<input type="checkbox"/> Revision Requesting Prior Approval	
<input type="checkbox"/> Administrative Revision	
<input type="checkbox"/> Response to Reopening	
II. Qualification Statement	
For SOP Revisions Only <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO	
For GOP Revisions Only <input type="checkbox"/> YES <input type="checkbox"/> NO	

Federal Operating Permit Program
Application for Permit Revision/Renewal
Form OP-2-Table 1 (continued)
Texas Commission on Environmental Quality

III. Major Source Pollutants (Complete this section if the permit revision is due to a change at the site or change in regulations.)

Indicate all pollutants for which the site is a major source based on the site's potential to emit:

(Check the appropriate box[es].)

☒ VOC ☒ NO_x ☒ SO₂ ☒ PM₁₀ ☒ CO ☐ Pb ☒ HAP

Other:

IV. Reference Only Requirements (For reference only)

Has the applicant paid emissions fees for the most recent agency fiscal year (September 1 - August 31)? ☒ YES ☐ NO ☐ N/A

V. Delinquent Fees and Penalties

Notice: This form will not be processed until all delinquent fees and/or penalties owed to the TCEQ or the Office of the Attorney General on behalf of the TCEQ are paid in accordance with the Delinquent Fee and penalty protocol.

**Federal Operating Permit Program
Application for Permit Revision/Renewal
Form OP-2-Table 2
Texas Commission on Environmental Quality**

Date: 11/02/2023
Permit No.: 03905
Regulated Entity No.: RN100225945
Company Name: The Dow Chemical Company

Using the table below, provide a description of the revision.

Revision No.	Revision Code	New Unit	Unit/Group	Process	NSR Authorization	Description of Change and Provisional Terms and Conditions
			ID No.	Applicable Form		
1	MS-C	NO	Not Applicable (Application Area)	OP-REQ1 (Page 3 & 4)	NSR 6803, 834, 114991, 119089	Dow is requesting to add Special Term and Condition related to Outdoor burning to include exception for Fire Training as allowed under 30 TAC 111.205 and for Recreation, Ceremony, Cooking, and Warmth as allowed under 30 TAC 111.207. Please see Form OP-REQ1 (Page 3 and 4) for the detailed citation.

**Federal Operating Permit Program
Application for Permit Revision/Renewal
Form OP-2-Table 2
Texas Commission on Environmental Quality**

Date: **11/02/2023**

Permit No.: **03905**

Regulated Entity No.: **RN100225945**

Company Name: **The Dow Chemical Company**

Using the table below, provide a description of the revision.

Revision No.	Revision Code	New Unit	Unit/Group	Process	NSR Authorization	Description of Change and Provisional Terms and Conditions
			ID No.	Applicable Form		
2	MS-C	N	B93P5F1 B93P5DU713 B93P5H510 B93P6H510 B93P5CT1 B93P5LR1 B93P5LR2 PROP3 PROP4 PROP5A PROP5B PROP6A PROP6B B27P3FU1 B27P3FU2 B27P3FU3 B93P6FU3 GRP-FUG EMISS [B93P5FU2, B93P5FU3]	OP-UA15 OP-UA12	NSR 6803, 834, 114991, 119089	Please update the 40 CFR Part 63, Subpart FFFF citations in order to remove the citations that are no longer applicable after August 12, 2023, and to include the new citations that are applicable after August 12, 2023. Please see Form OP-REQ3 for the detailed citations.

**Federal Operating Permit Program
Application for Permit Revision/Renewal
Form OP-2-Table 2
Texas Commission on Environmental Quality**

Date: 11/02/2023
Permit No.: 03905
Regulated Entity No.: RN100225945
Company Name: The Dow Chemical Company

Using the table below, provide a description of the revision.

Revision No.	Revision Code	New Unit	Unit/Group	Process	NSR Authorization	Description of Change and Provisional Terms and Conditions
			ID No.	Applicable Form		
3	MS-C	NO	B93P6DU713	OP-UA15	NSR 119089	<p>Please update the 40 CFR Part 63, Subpart FFFF citations in order to remove the citations that are no longer applicable after August 12, 2023, and to include the new citations that are applicable after August 12, 2023.</p> <p>Please update textual description to read as “For each Group 1 continuous process vent, the owner or operator must reduce emissions of total organic HAP by venting emissions through a closed vent system to a flare”. In the current permit it was inadvertently identified as uncontrolled vent to atmosphere.</p> <p>Please see Form OP-REQ3 for the detailed citations.</p>

**Federal Operating Permit Program
Application for Permit Revision/Renewal
Form OP-2-Table 2
Texas Commission on Environmental Quality**

Date: 11/02/2023
Permit No.: 03905
Regulated Entity No.: RN100225945
Company Name: The Dow Chemical Company

Using the table below, provide a description of the revision.

Revision No.	Revision Code	New Unit	Unit/Group	Process	NSR Authorization	Description of Change and Provisional Terms and Conditions
			ID No.	Applicable Form		
4	MS-C	NO	B93P5ST816 GRP-TANK 1 [B93P5ST811, B93P5ST812] GRP-TANK 2 [B93P5ST311, B93P5ST412, B93P5ST413, B93P5ST414, B93P5ST611] GRP-TANK 3 [B93P5ST806, B93P5ST807, B93P5ST809]	OP-UA15	NSR 114991	Please update the 40 CFR Part 63, Subpart FFFF citations in order to remove the citations that are no longer applicable after August 12, 2023, and to include the new citations that are applicable after August 12, 2023. Please see Form OP-REQ3 for the detailed citations.

**Federal Operating Permit Program
Application for Permit Revision/Renewal
Form OP-2-Table 2
Texas Commission on Environmental Quality**

Date: 11/02/2023
Permit No.: 03905
Regulated Entity No.: RN100225945
Company Name: The Dow Chemical Company

Using the table below, provide a description of the revision.

Revision No.	Revision Code	New Unit	Unit/Group	Process	NSR Authorization	Description of Change and Provisional Terms and Conditions
			ID No.	Applicable Form		
5	MS-C	NO	B93P5LR3	OP-UA15	NSR 114991	Please add positive applicability to 40 CFR Part 63, Subpart FFFF for this unit. Please see Form OP-REQ3 for the detailed citations.
6	MS-C	NO	B93P6FU3 GRP-FUGITIVES {B93P6FU2, B93P6FU3}	OP-UA12	NSR 119089	The two fugitive areas B93P6FU2 and B93P6FU3 is combined into one fugitive area under B93P6FU3. Dow is requesting to delete GRP-FUGITIVES and B93P6FU2.
7	MS-C	NO	B41P4FU1 B41P4FU2	OP-UA12	NSR 834	Dow is requesting to delete positive applicability to 40 CFR Part 63, Subpart FFFF for these unit. These unit does not contain organic HAP greater than 5% by weight as defined in 63.161. These units will have negative applicability; however, Dow will not be submitting the applicable forms at this time in order to keep this a minor revision.

**Federal Operating Permit Program
Application for Permit Revision/Renewal
Form OP-2-Table 2
Texas Commission on Environmental Quality**

Date: 11/02/2023
Permit No.: 03905
Regulated Entity No.: RN100225945
Company Name: The Dow Chemical Company

Using the table below, provide a description of the revision.

Revision No.	Revision Code	New Unit	Unit/Group	Process	NSR Authorization	Description of Change and Provisional Terms and Conditions
			ID No.	Applicable Form		
8	MS-C	NO	B93P5PV51D B93P6PV51D	OP-UA28	NSR 114991 NSR 119089	Please add 40 CFR Part 60, Subpart DDD positive applicability to these unit. Please see Form OP-REQ3 and OP-UA28 for the detailed citations.
9	MS-C	YES	B27P3BT2600	OP-UA3	PBR 106.472	This is caustic storage tank authorized under PBR 106.472. This tank will have negative applicability for 30 TAC 115. However, Dow will not be submitting the applicable forms at this time in order to keep this a minor revision and permit shield will be updated in next significant revision.

**Federal Operating Permit Program
Application for Permit Revision/Renewal
Form OP-2-Table 3
Texas Commission on Environmental Quality**

Date: 11/02/2023	
Permit No.: 03905	
Regulated Entity No.: RN100225945	
Company Name: The Dow Chemical Company	
I. Significant Revision <i>(Complete this section if you are submitting a significant revision application or a renewal application that includes a significant revision.)</i>	
A.	Is the site subject to bilingual requirements pursuant to 30 TAC § 122.322? <input type="checkbox"/> YES <input type="checkbox"/> NO
B.	Indicate the alternate language(s) in which public notice is required:
C.	Will, there be a change in air pollutant emissions as a result of the significant revision? <input type="checkbox"/> YES <input type="checkbox"/> NO

Texas Commission on Environmental Quality
Federal Operating Permit Program
Individual Unit Summary for Revisions
Form OP-SUMR

[Table 1](#)

Date	Permit No.	Regulated Entity No.
11/2/2023	03905	RN100225945

Unit/Process AI	Unit/Process Revision No.	Unit/Process ID No.	Unit/Process Applicable Form	Unit/Process Name/ Description	Unit/Process CAM	Preconstruction Authorizations 30 TAC Chapter 116/ 30 TAC Chapter 106	Preconstruction Authorizations Title I
A	9	B27P3BT2600	PBR-SUP	Caustic Storage Tank BT-2600		PBR 106.472	
	8	B93P5PV51D	OP-UA28	SPIN DRYER SD-5511		NSR 114991	
	8	B93P6PV51D	OP-UA28	SPIN DRYER SD-6511		NSR 119089	
	5	B93P5LR3	OP-UA15	D-5808 WATER LOADING RACK		NSR 114991	

Texas Commission on Environmental Quality
Polymer Manufacturing Attributes
Form OP-UA28 (Page 1)

Federal Operating Permit Program

Table 1a: Title 40 Code of Federal Regulations Part 60

Subpart DDD: Standards of Performance for Volatile Organic Compound (VOC) Emissions from the Polymer Manufacturing Industry

Date	Permit No.	Regulated Entity No.
11/02/2023	03905	RN100225945

Process ID No.	SOP Index No.	Manufactured Product	Continuous Process	Construction/Modification Date	Experimental Process Line	Modified After Applicability Date	Table 2 Threshold Emission Rates
<i>B93P5PV51D</i>	<i>60DDD-01</i>	<i>PROPYL</i>	<i>YES</i>	<i>89+</i>	<i>NO</i>		
<i>B93P6PV51D</i>	<i>60DDD-01</i>	<i>PROPYL</i>	<i>YES</i>	<i>89+</i>	<i>NO</i>		

Texas Commission on Environmental Quality
Polymer Manufacturing Attributes
Form OP-UA28 (Page 4)
Federal Operating Permit Program

Table 1d: Title 40 Code of Federal Regulations Part 60

Subpart DDD: Standards of Performance for Volatile Organic Compound (VOC) Emissions from the Polymer Manufacturing Industry

Date	Permit No.	Regulated Entity No.
11/02/2023	03905	RN100225945

Process ID No.	SOP Index No.	Polyolefin Production	Process Emissions	Uncontrolled Annual Emissions	Weight Percent TOC
<i>B93P5PV51D</i>	<i>60DDD-01</i>	<i>1+</i>	<i>CONT</i>	<i>1.6+</i>	<i>0.1-</i>
<i>B93P6PV51D</i>	<i>60DDD-01</i>	<i>1+</i>	<i>CONT</i>	<i>1.6+</i>	<i>0.1-</i>

Texas Commission on Environmental Quality
Polymer Manufacturing Attributes
Form OP-UA28 (Page 5)
Federal Operating Permit Program

Table 1e: Title 40 Code of Federal Regulations Part 60

Subpart DDD: Standards of Performance for Volatile Organic Compound (VOC) Emissions from the Polymer Manufacturing Industry

Date	Permit No.	Regulated Entity No.
11/02/2023	03905	RN100225945

Process ID No.	SOP Index No.	Control of Continuous Emissions	Continuous Control Device	Control Device ID No.	Annual Emissions Entering the Control Device	Table 3 Control Requirements	Emission Reduction From Control Device
<i>B93P5PV51D</i>	<i>60DDD-01</i>	<i>NONE</i>					
<i>B93P6PV51D</i>	<i>60DDD-01</i>	<i>NONE</i>					

Fugitive Emission Unit Attributes
Form OP-UA12 (Page 70)
Federal Operating Permit Program
Table 9a: Title 40 Code of Federal Regulations Part 63 (40 CFR Part 63)
Subpart H: National Emission Standards for Organic Hazardous Air Pollutants for Equipment Leaks
Texas Commission on Environmental Quality

Date	Permit No.	Regulated Entity No.
11/02/2023	03905	RN100225945

Unit ID No.	SOP Index No.	Equipment Type	Non Research and Development/Batch Processes	Vacuum Service	Less Than 300 Operating Hours	Heavy Liquid Service	AMEL
B41P4FU1	63FFFF ALL						
B41P4FU2	63FFFF ALL						

**Applicable Requirements Summary
Form OP-REQ3 (Page 1)
Federal Operating Permit Program**

Table 1a: Additions

Date: November 2, 2023	Regulated Entity No.: RN100225945	Permit No.: 03905
Company Name: The Dow Chemical Company	Area Name: Polyethylene	

Revision No.	Unit/Group/ Process ID No.	Unit/Group/ Process Applicable Form	SOP/GOP Index No	Pollutant	Applicable Regulatory Requirement Name	Applicable Regulatory Requirement Standard(s)
2	B93P5F1	OP-UA15	63FFFF-01	112(B) HAPS	40 CFR Part 63, Subpart FFFF	§ 63.2455(a)-Table 1.1.a.ii § 63.11(b) § 63.2450(b) § 63.2455(a) § 63.2455(b) § 63.2455(b)(1) § 63.982(b) § 63.983(a)(1) § 63.983(a)(2) § 63.983(d)(1) § 63.983(d)(1)(i) [G]§ 63.983(d)(2) § 63.983(d)(3) § 63.987(a) § 63.997(b)(2) § 63.997(b)(3) § 63.997(c)(3) § 63.2450(e)(4), § 63.2450(e)(5), § 63.2450(e)(6) § 63.2450(g)(7), § 63.2450(k)(8), § 63.2450(u) § 63.2450(v), § 63.2535(m)(1), (m)(2), § 63.670, § 63.671

**Applicable Requirements Summary
Form OP-REQ3 (Page 1)
Federal Operating Permit Program**

Table 1a: Additions

Date: November 2, 2023	Regulated Entity No.: RN100225945	Permit No.: 03905
Company Name: The Dow Chemical Company	Area Name: Polyethylene	

Revision No.	Unit/Group/ Process ID No.	Unit/Group/ Process Applicable Form	SOP/GOP Index No	Pollutant	Applicable Regulatory Requirement Name	Applicable Regulatory Requirement Standard(s)
2	B93P5F1	OP-UA15	63FFFF-02	112(B) HAPS	40 CFR Part 63, Subpart FFFF	§ 63.2455(a)-Table 1.1.a.ii § 63.11(b) § 63.2450(b) § 63.2455(a) § 63.2455(b) § 63.2455(b)(1) § 63.982(b) § 63.983(a)(1) § 63.983(a)(2) § 63.983(d)(1) § 63.983(d)(1)(i) [G]§ 63.983(d)(2) § 63.983(d)(3) § 63.987(a) § 63.987(b)(1) § 63.987(b)(3) [G]§ 63.997(c)(1) § 63.997(c)(3) § 63.2450(e)(4), § 63.2450(e)(5), § 63.2450(e)(6) § 63.2450(g)(7), § 63.2450(k)(8), § 63.2450(u) § 63.2450(v), § 63.2535(m)(1), (m)(2), § 63.670, § 63.671

**Applicable Requirements Summary
Form OP-REQ3 (Page 1)
Federal Operating Permit Program**

Table 1a: Additions

Date: November 2, 2023	Regulated Entity No.: RN100225945	Permit No.: 03905
Company Name: The Dow Chemical Company	Area Name: Polyethylene	

Revision No.	Unit/Group/ Process ID No.	Unit/Group/ Process Applicable Form	SOP/GOP Index No	Pollutant	Applicable Regulatory Requirement Name	Applicable Regulatory Requirement Standard(s)
2	B93P5DU713	OP-UA15	63FFFF-01	112(B) HAPS	40 CFR Part 63, Subpart FFFF	§ 63.2455(a)-Table 1.1.a.ii § 63.11(b) § 63.2450(b) § 63.2455(a) § 63.2455(b) § 63.2455(b)(1) § 63.982(b) § 63.983(a)(1) § 63.983(a)(2) § 63.983(a)(3) § 63.983(a)(3)(ii) § 63.983(d)(1) § 63.983(d)(1)(i) [G]§ 63.983(d)(2) § 63.983(d)(3) § 63.987(a) § 63.987(b)(1) § 63.987(b)(3) [G]§ 63.997(c)(1) § 63.997(c)(3) § 63.2450(e)(4), § 63.2450(e)(5), § 63.2450(e)(6) § 63.2450(g)(7), § 63.2450(k)(8), § 63.2450(u) § 63.2535(m)(1), (m)(2), § 63.670, § 63.671

**Applicable Requirements Summary
Form OP-REQ3 (Page 1)
Federal Operating Permit Program**

Table 1a: Additions

Date: November 2, 2023	Regulated Entity No.: RN100225945	Permit No.: 03905
Company Name: The Dow Chemical Company	Area Name: Polyethylene	

Revision No.	Unit/Group/Process ID No.	Unit/Group/Process Applicable Form	SOP/GOP Index No	Pollutant	Applicable Regulatory Requirement Name	Applicable Regulatory Requirement Standard(s)
2	B93P5H510	OP-UA15	63FFFF-01	112(B) HAPS	40 CFR Part 63, Subpart FFFF	§ 63.2455(a)-Table 1.1.a.i § 63.2450(a)(2), § 63.2450(e)(4), § 63.2450(e)(6) § 63.2450(b) § 63.2450(g)(6), § 63.2450(g)(7), § 63.2450(k)(8) § 63.2450(i)(3), § 63.2450(u), § 63.2450(v) § 63.2455(a), § 63.2455(b) § 63.2455(b)(1) § 63.982(c), § 63.982(c)(2), § 63.983(a)(1), § 63.983(a)(2) § 63.983(a)(3), § 63.983(a)(3)(i), § 63.983(d)(1) § 63.983(d)(1)(i), [G]§ 63.983(d)(2), § 63.983(d)(3) § 63.988(a)(1) § 63.988(a)(2) § 63.988(a)(3) § 63.988(b)(2) § 63.996(c)(1) § 63.996(c)(2) § 63.996(c)(2)(i) § 63.996(c)(3) § 63.996(c)(4) § 63.996(c)(5) § 63.996(c)(6) § 63.997(c)(3)

**Applicable Requirements Summary
Form OP-REQ3 (Page 1)
Federal Operating Permit Program**

Table 1a: Additions

Date: November 2, 2023	Regulated Entity No.: RN100225945	Permit No.: 03905
Company Name: The Dow Chemical Company	Area Name: Polyethylene	

Revision No.	Unit/Group/Process ID No.	Unit/Group/Process Applicable Form	SOP/GOP Index No	Pollutant	Applicable Regulatory Requirement Name	Applicable Regulatory Requirement Standard(s)
3	B93P56DU713	OP-UA15	63FFFF-01	112(B) HAPS	40 CFR Part 63, Subpart FFFF	<p><i>§ 63.2455(a)-Table 1.1.a.ii</i> <i>§ 63.2450(b)</i> <i>§ 63.2455(a)</i> § 63.2455(b) § 63.2455(b)(1), § 63.2455(b)(2), § 63.2455(b)(3) <i>§ 63.983(a)(1)</i> <i>§ 63.983(a)(2)</i> <i>§ 63.983(a)(3)</i> <i>§ 63.983(a)(3)(ii)</i> <i>§ 63.983(d)(1)</i> <i>§ 63.983(d)(1)(i)</i> <i>[G]§ 63.983(d)(2)</i> <i>§ 63.983(d)(3)</i> <i>§ 63.2450(e)(4), § 63.2450(e)(5), § 63.2450(e)(6)</i> <i>§ 63.2450(g)(7), § 63.2450(k)(8), § 63.2450(u)</i> <i>§ 63.2535(m)(1), (m)(2), § 63.670, § 63.671</i></p>

**Applicable Requirements Summary
Form OP-REQ3 (Page 1)
Federal Operating Permit Program**

Table 1a: Additions

Date: November 2, 2023	Regulated Entity No.: RN100225945	Permit No.: 03905
Company Name: The Dow Chemical Company	Area Name: Polyethylene	

Revision No.	Unit/Group/ Process ID No.	Unit/Group/ Process Applicable Form	SOP/GOP Index No	Pollutant	Applicable Regulatory Requirement Name	Applicable Regulatory Requirement Standard(s)
2	B93P6H510	OP-UA15	63FFFF-01	112(B) HAPS	40 CFR Part 63, Subpart FFFF	§ 63.2455(a)-Table 1.1.a.i § 63.2450(a)(2), § 63.2450(e)(4), § 63.2450(e)(6) § 63.2450(b) § 63.2450(g)(6), § 63.2450(g)(7), § 63.2450(k)(8) § 63.2450(i)(3), § 63.2450(u), § 63.2450(v) § 63.2455(a), § 63.2455(b) § 63.2455(b)(1) § 63.982(c), § 63.982(c)(2), § 63.983(a)(1), § 63.983(a)(2) § 63.983(a)(3), § 63.983(a)(3)(i), § 63.983(d)(1) § 63.983(d)(1)(i), [G]§ 63.983(d)(2), § 63.983(d)(3) § 63.988(a)(1) § 63.988(a)(2) § 63.988(a)(3) § 63.988(b)(2) § 63.996(c)(1) § 63.996(c)(2) § 63.996(c)(2)(i) § 63.996(c)(3) § 63.996(c)(4) § 63.996(c)(5) § 63.996(c)(6) § 63.997(c)(3)

**Applicable Requirements Summary
Form OP-REQ3 (Page 1)
Federal Operating Permit Program**

Table 1a: Additions

Date: November 2, 2023	Regulated Entity No.: RN100225945	Permit No.: 03905
Company Name: The Dow Chemical Company	Area Name: Polyethylene	

Revision No.	Unit/Group/ Process ID No.	Unit/Group/ Process Applicable Form	SOP/GOP Index No	Pollutant	Applicable Regulatory Requirement Name	Applicable Regulatory Requirement Standard(s)
4	B93P5ST816	OP-UA15	63FFFF-01	112(B) HAPS	40 CFR Part 63, Subpart FFFF	§ 63.2470(a)-Table 4.1.b.iii § 63.11(b) § 63.2450(b) § 63.2470(a) § 63.2470(d) § 63.982(b) § 63.983(a)(1) § 63.983(a)(2) § 63.983(d)(1) § 63.983(d)(1)(i) [G]§ 63.983(d)(2) § 63.983(d)(3) § 63.987(a) § 63.997(b)(2), § 63.997(b)(3), § 63.997(c)(3) § 63.2470(f) § 63.2445(g)(3) § 63.2450(e)(4), § 63.2450(e)(5), § 63.2450(e)(6) § 63.2450(g)(7) § 63.2450(k)(8) § 63.2450(u) § 63.2535(m)(1), (m)(2) § 63.670, § 63.671

**Applicable Requirements Summary
Form OP-REQ3 (Page 1)
Federal Operating Permit Program**

Table 1a: Additions

Date: November 2, 2023	Regulated Entity No.: RN100225945	Permit No.: 03905
Company Name: The Dow Chemical Company	Area Name: Polyethylene	

Revision No.	Unit/Group/Process ID No.	Unit/Group/Process Applicable Form	SOP/GOP Index No	Pollutant	Applicable Regulatory Requirement Name	Applicable Regulatory Requirement Standard(s)
4	GRP-TANK 1 [B93P5ST811, B93P5ST812]	OP-UA15	63FFFF-01	112(B) HAPS	40 CFR Part 63, Subpart FFFF	§ 63.2470(a)-Table 4.1.b.iii § 63.11(b) § 63.2450(b) § 63.2470(a) § 63.2470(d) § 63.982(b) § 63.983(a)(1) § 63.983(a)(2) § 63.983(d)(1) § 63.983(d)(1)(i) [G]§ 63.983(d)(2) § 63.983(d)(3) § 63.987(a) § 63.997(b)(2), § 63.997(b)(3), § 63.997(c)(3) § 63.2470(f) § 63.2445(g)(3) § 63.2450(e)(4), § 63.2450(e)(5), § 63.2450(e)(6) § 63.2450(g)(7) § 63.2450(k)(8) § 63.2450(u) § 63.2535(m)(1), (m)(2) § 63.670, § 63.671

**Applicable Requirements Summary
Form OP-REQ3 (Page 1)
Federal Operating Permit Program**

Table 1a: Additions

Date: November 2, 2023	Regulated Entity No.: RN100225945	Permit No.: 03905
Company Name: The Dow Chemical Company	Area Name: Polyethylene	

Revision No.	Unit/Group/Process ID No.	Unit/Group/Process Applicable Form	SOP/GOP Index No	Pollutant	Applicable Regulatory Requirement Name	Applicable Regulatory Requirement Standard(s)
4	GRP-TANK 2 [B93P5ST311, B93P5ST412, B93P5ST413, B93P5ST414, B93P5ST611]	OP-UA15	63FFFF-01	112(B) HAPS	40 CFR Part 63, Subpart FFFF	§ 63.2470(a)-Table 4.1.b.iii § 63.11(b) § 63.2450(b) § 63.2470(a) § 63.2470(d) § 63.982(b) § 63.983(a)(1) § 63.983(a)(2) § 63.983(d)(1) § 63.983(d)(1)(i) [G]§ 63.983(d)(2) § 63.983(d)(3) § 63.987(a) § 63.997(b)(2), § 63.997(b)(3), § 63.997(c)(3) § 63.2470(f) § 63.2445(g)(3) § 63.2450(e)(4), § 63.2450(e)(5), § 63.2450(e)(6) § 63.2450(g)(7) § 63.2450(k)(8) § 63.2450(u) § 63.2535(m)(1), (m)(2) § 63.670, § 63.671

**Applicable Requirements Summary
Form OP-REQ3 (Page 1)
Federal Operating Permit Program**

Table 1a: Additions

Date: November 2, 2023	Regulated Entity No.: RN100225945	Permit No.: 03905
Company Name: The Dow Chemical Company	Area Name: Polyethylene	

Revision No.	Unit/Group/Process ID No.	Unit/Group/Process Applicable Form	SOP/GOP Index No	Pollutant	Applicable Regulatory Requirement Name	Applicable Regulatory Requirement Standard(s)
4	GRP-TANK 3 [B93P5ST806, B93P5ST807, B93P5ST809]	OP-UA15	63FFFF-01	112(B) HAPS	40 CFR Part 63, Subpart FFFF	§ 63.2470(a)-Table 4.1.b.iii § 63.11(b) § 63.2450(b) § 63.2470(a) § 63.2470(d) § 63.982(b) § 63.983(a)(1) § 63.983(a)(2) § 63.983(d)(1) § 63.983(d)(1)(i) [G]§ 63.983(d)(2) § 63.983(d)(3) § 63.987(a) § 63.997(b)(2), § 63.997(b)(3), § 63.997(c)(3) § 63.2470(f) § 63.2445(g)(3) § 63.2450(e)(4), § 63.2450(e)(5), § 63.2450(e)(6) § 63.2450(g)(7) § 63.2450(k)(8) § 63.2450(u) § 63.2535(m)(1), (m)(2) § 63.670, § 63.671

**Applicable Requirements Summary
Form OP-REQ3 (Page 1)
Federal Operating Permit Program**

Table 1a: Additions

Date: November 2, 2023	Regulated Entity No.: RN100225945	Permit No.: 03905
Company Name: The Dow Chemical Company	Area Name: Polyethylene	

Revision No.	Unit/Group/ Process ID No.	Unit/Group/ Process Applicable Form	SOP/GOP Index No	Pollutant	Applicable Regulatory Requirement Name	Applicable Regulatory Requirement Standard(s)
2	B93P5CT1	OP-UA15	63FFFF-01	112(B) HAPS	40 CFR Part 63, Subpart FFFF	§ 63.2490(a)-Table10, <i>item (b)</i> § 63.104(<i>a)(1), (a)(2), (a)(5) and (a)(6)</i> [G]§ 63.104(d) § 63.104(e) § 63.104(e)(1) [G]§ 63.104(e)(2) § 63.2490(a) § 63.2490(b) § 63.2490(c) § 63.2490(d)

**Applicable Requirements Summary
Form OP-REQ3 (Page 1)
Federal Operating Permit Program**

Table 1a: Additions

Date: November 2, 2023	Regulated Entity No.: RN100225945	Permit No.: 03905
Company Name: The Dow Chemical Company	Area Name: Polyethylene	

Revision No.	Unit/Group/ Process ID No.	Unit/Group/ Process Applicable Form	SOP/GOP Index No	Pollutant	Applicable Regulatory Requirement Name	Applicable Regulatory Requirement Standard(s)
2	B93P5LR1	OP-UA15	63FFFF-01	112(B) HAPS	40 CFR Part 63, Subpart FFFF	§ 63.2475(a)-Table 5.1.b § 63.11(b) § 63.2450(b) § 63.2475(a) § 63.982(b) § 63.983(a)(1) § 63.983(a)(2) § 63.983(d)(1) § 63.983(d)(1)(i) [G]§ 63.983(d)(2) § 63.983(d)(3) § 63.987(a) § 63.997(b)(2) § 63.997(b)(3) § 63.997(c)(3) § 63.2450(e)(4) § 63.2450(e)(5) § 63.2450(e)(6) § 63.2450(g)(7) § 63.2450(k)(8) § 63.2450(u) § 63.2535(m)(1), (m)(2) § 63.670, § 63.671

**Applicable Requirements Summary
Form OP-REQ3 (Page 1)
Federal Operating Permit Program**

Table 1a: Additions

Date: November 2, 2023	Regulated Entity No.: RN100225945	Permit No.: 03905
Company Name: The Dow Chemical Company	Area Name: Polyethylene	

Revision No.	Unit/Group/ Process ID No.	Unit/Group/ Process Applicable Form	SOP/GOP Index No	Pollutant	Applicable Regulatory Requirement Name	Applicable Regulatory Requirement Standard(s)
2	B93P5LR2	OP-UA15	63FFFF-01	112(B) HAPS	40 CFR Part 63, Subpart FFFF	§ 63.2475(a)-Table 5.1.b § 63.11(b) § 63.2450(b) § 63.2475(a) § 63.982(b) § 63.983(a)(1) § 63.983(a)(2) § 63.983(d)(1) § 63.983(d)(1)(i) [G]§ 63.983(d)(2) § 63.983(d)(3) § 63.987(a) § 63.997(b)(2) § 63.997(b)(3) § 63.997(c)(3) § 63.2450(e)(4) § 63.2450(e)(5) § 63.2450(e)(6) § 63.2450(g)(7) § 63.2450(k)(8) § 63.2450(u) § 63.2535(m)(1), (m)(2) § 63.670, § 63.671

**Applicable Requirements Summary
Form OP-REQ3 (Page 1)
Federal Operating Permit Program**

Table 1a: Additions

Date: November 2, 2023	Regulated Entity No.: RN100225945	Permit No.: 03905
Company Name: The Dow Chemical Company	Area Name: Polyethylene	

Revision No.	Unit/Group/ Process ID No.	Unit/Group/ Process Applicable Form	SOP/GOP Index No	Pollutant	Applicable Regulatory Requirement Name	Applicable Regulatory Requirement Standard(s)
5	<i>B93P5LR3</i>	OP-UA15	63FFFF-01	112(B) HAPS	40 CFR Part 63, Subpart FFFF	<i>§ 63.2475(a)-Table 5.1.b</i> <i>§ 63.2450(b)</i> <i>§ 63.2475(a)</i> <i>§ 63.983(a)(1)</i> <i>§ 63.983(a)(2)</i> <i>§ 63.983(d)(1)</i> <i>§ 63.983(d)(1)(i)</i> <i>[G]§ 63.983(d)(2)</i> <i>§ 63.983(d)(3)</i> <i>§ 63.2450(e)(4)</i> <i>§ 63.2450(e)(5)</i> <i>§ 63.2450(e)(6)</i> <i>§ 63.2450(g)(7)</i> <i>§ 63.2450(k)(8)</i> <i>§ 63.2450(u)</i> <i>§ 63.2535(m)(1), (m)(2)</i> <i>§ 63.670, § 63.671</i>

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Table 1a: Additions

Date: November 2, 2023	Regulated Entity No.: RN100225945	Permit No.: 03905
Company Name: The Dow Chemical Company	Area Name: Polyethylene	

Revision No.	Unit/Group/ Process ID No.	Unit/Group/ Process Applicable Form	SOP/GOP Index No	Pollutant	Applicable Regulatory Requirement Name	Applicable Regulatory Requirement Standard(s)
2	PROP3	OP-UA15	63FFFF-01	112(B) HAPS	40 CFR Part 63, Subpart FFFF	§ 63.2440(a) § 63.2450(a), § 63.2450(a)(2), 63.2450(e)(4) § 63.2450(v), § 63.2450(l) § 63.2460(c)(1)
2	PROP4	OP-UA15	63FFFF-01	112(B) HAPS	40 CFR Part 63, Subpart FFFF	§ 63.2440(a) § 63.2450(a), § 63.2450(a)(2), 63.2450(e)(4) § 63.2450(v), § 63.2450(l)

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Table 1a: Additions

Date: November 2, 2023	Regulated Entity No.: RN100225945	Permit No.: 03905
Company Name: The Dow Chemical Company	Area Name: Polyethylene	

Revision No.	Unit/Group/ Process ID No.	Unit/Group/ Process Applicable Form	SOP/GOP Index No	Pollutant	Applicable Regulatory Requirement Name	Applicable Regulatory Requirement Standard(s)
2	PROP5A	OP-UA15	63FFFF-01	112(B) HAPS	40 CFR Part 63, Subpart FFFF	§ 63.2440(a) § 63.2450(a), § 63.2450(a)(2), 63.2450(e)(4) § 63.2450(v), § 63.2450(l) § 63.2460(c)(1)

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Table 1a: Additions

Date: November 2, 2023	Regulated Entity No.: RN100225945	Permit No.: 03905
Company Name: The Dow Chemical Company	Area Name: Polyethylene	

Revision No.	Unit/Group/ Process ID No.	Unit/Group/ Process Applicable Form	SOP/GOP Index No	Pollutant	Applicable Regulatory Requirement Name	Applicable Regulatory Requirement Standard(s)
2	PROP5B	OP-UA15	63FFFF-01	112(B) HAPS	40 CFR Part 63, Subpart FFFF	§ 63.2460(a) § 63.11(b) § 63.2450(b) § 63.2460(a)-Table 2.1.c § 63.2460(b) § 63.2460(c)(7) § 63.982(b) § 63.983(a)(1) § 63.983(a)(2) § 63.983(d)(1) § 63.983(d)(1)(i) [G]§ 63.983(d)(2) § 63.983(d)(3) § 63.987(a) § 63.997(b)(2) § 63.997(b)(3) § 63.997(c)(3) § 63.2450(a), (a)(2), § 63.2450(e)(4), § 63.2450(e)(5), § 63.2450(e)(6), § 63.2450(g)(7), § 63.2450(k)(8), § 63.2450(u), § 63.2535(m), § 63.2450(v)

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Table 1a: Additions

Date: November 2, 2023	Regulated Entity No.: RN100225945	Permit No.: 03905
Company Name: The Dow Chemical Company	Area Name: Polyethylene	

Revision No.	Unit/Group/ Process ID No.	Unit/Group/ Process Applicable Form	SOP/GOP Index No	Pollutant	Applicable Regulatory Requirement Name	Applicable Regulatory Requirement Standard(s)
2	PROP6A	OP-UA15	63FFFF-01	112(B) HAPS	40 CFR Part 63, Subpart FFFF	§ 63.2440(a) § 63.2450(a), § 63.2450(a)(2), 63.2450(e)(4) § 63.2450(v), § 63.2450(l) § 63.2460(c)(1)

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Table 1a: Additions

Date: November 2, 2023	Regulated Entity No.: RN100225945	Permit No.: 03905
Company Name: The Dow Chemical Company	Area Name: Polyethylene	

Revision No.	Unit/Group/ Process ID No.	Unit/Group/ Process Applicable Form	SOP/GOP Index No	Pollutant	Applicable Regulatory Requirement Name	Applicable Regulatory Requirement Standard(s)
2	PROP6B	OP-UA15	63FFFF-01	112(B) HAPS	40 CFR Part 63, Subpart FFFF	§ 63.2460(a) § 63.11(b) § 63.2450(b) § 63.2460(a)-Table 2.1.c § 63.2460(b) § 63.2460(c)(7) § 63.982(b) § 63.983(a)(1) § 63.983(a)(2) § 63.983(d)(1) § 63.983(d)(1)(i) [G]§ 63.983(d)(2) § 63.983(d)(3) § 63.987(a) § 63.997(b)(2) § 63.997(b)(3) § 63.997(c)(3) § 63.2450(a), (a)(2), § 63.2450(e)(4), § 63.2450(e)(5), § 63.2450(e)(6), § 63.2450(g)(7), § 63.2450(k)(8), § 63.2450(u), § 63.2535(m), § 63.2450(v)

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Table 1a: Additions

Date: November 2, 2023	Regulated Entity No.: RN100225945	Permit No.: 03905
Company Name: The Dow Chemical Company	Area Name: Polyethylene	

Revision No.	Unit/Group/Process ID No.	Unit/Group/Process Applicable Form	SOP/GOP Index No	Pollutant	Applicable Regulatory Requirement Name	Applicable Regulatory Requirement Standard(s)
2	B27P3FU1 B27P3FU2 B27P3FU3 GRP-FUG EMISS B93P6FU3	OP-UA12	63FFFF-01	112(B) HAPS	40 CFR Part 63, Subpart FFFF [Connectors in Heavy Liquid service]	§ 63.2480(a)-Table 6.1.b § 63.162(a) § 63.162(c) [G]§ 63.162(f) [G]§ 63.162(g) § 63.162(h) [G]§ 63.169 [G]§ 63.171 § 63.2480(a) § 63.2480(b) § 63.2480(b)(3), § 63.2480(b)(7)
2	B27P3FU1 B27P3FU2 B27P3FU3 GRP-FUG EMISS B93P6FU3	OP-UA12	63FFFF-01	112(B) HAPS	40 CFR Part 63, Subpart FFFF [Sampling connection systems]	§ 63.2480(a)-Table 6.1.b § 63.162(a) § 63.162(c) [G]§ 63.162(g) § 63.162(h) [G]§ 63.166 [G]§ 63.171 § 63.2480(a) § 63.2480(b), § 63.2480(b)(7)

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Table 1a: Additions

Date: November 2, 2023	Regulated Entity No.: RN100225945	Permit No.: 03905
Company Name: The Dow Chemical Company	Area Name: Polyethylene	

Revision No.	Unit/Group/Process ID No.	Unit/Group/Process Applicable Form	SOP/GOP Index No	Pollutant	Applicable Regulatory Requirement Name	Applicable Regulatory Requirement Standard(s)
2	B27P3FU1 B27P3FU2 B27P3FU3 GRP-FUG EMISS B93P6FU3	OP-UA12	63FFFF-01	112(B) HAPS	40 CFR Part 63, Subpart FFFF [Open-ended valves or lines]	§ 63.2480(a)-Table 6.1.b § 63.162(a) § 63.162(c) [G]§ 63.162(g) § 63.162(h) [G]§ 63.167 [G]§ 63.171 [G]§ 63.175 § 63.2480(a) § 63.2480(b) § 63.2480(b)(7)
2	B27P3FU1 B27P3FU2 B27P3FU3 GRP-FUG EMISS B93P6FU3	OP-UA12	63FFFF-01	112(B) HAPS	40 CFR Part 63, Subpart FFFF [Compressors]	§ 63.2480(a)-Table 6.1.b § 63.162(a) § 63.162(c) [G]§ 63.162(f) [G]§ 63.162(g) § 63.162(h) [G]§ 63.164 [G]§ 63.171 § 63.2480(a) § 63.2480(b), § 63.2480(b)(7) § 63.2480(f)(1) - (f)(4)

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Table 1a: Additions

Date: November 2, 2023	Regulated Entity No.: RN100225945	Permit No.: 03905
Company Name: The Dow Chemical Company	Area Name: Polyethylene	

Revision No.	Unit/Group/Process ID No.	Unit/Group/Process Applicable Form	SOP/GOP Index No	Pollutant	Applicable Regulatory Requirement Name	Applicable Regulatory Requirement Standard(s)
2	B27P3FU1 B27P3FU2 B27P3FU3 GRP-FUG EMISS B93P6FU3	OP-UA12	63FFFF-01	112(B) HAPS	40 CFR Part 63, Subpart FFFF [Pumps in light liquid service]	§ 63.2480(a)-Table 6.1.b § 63.162(a) § 63.162(c) [G]§ 63.162(f) [G]§ 63.162(g) § 63.162(h) [G]§ 63.163 [G]§ 63.171 [G]§ 63.176 § 63.2480(a) § 63.2480(b), § 63.2480(b)(7) § 63.2480(b)(6), § 63.2480(f)(1)
2	B27P3FU1 B27P3FU2 B27P3FU3 GRP-FUG EMISS B93P6FU3	OP-UA12	63FFFF-01	112(B) HAPS	40 CFR Part 63, Subpart FFFF [equipment that is in organic HAP service less than 300 hours per year]	§ 63.2480(a)-Table 6.1.b § 63.162(a) § 63.162(c) § 63.162(e) [G]§ 63.162(g) § 63.162(h) § 63.2480(a) § 63.2480(b), § 63.2480(b)(7)

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Table 1a: Additions

Date: November 2, 2023	Regulated Entity No.: RN100225945	Permit No.: 03905
Company Name: The Dow Chemical Company	Area Name: Polyethylene	

Revision No.	Unit/Group/Process ID No.	Unit/Group/Process Applicable Form	SOP/GOP Index No	Pollutant	Applicable Regulatory Requirement Name	Applicable Regulatory Requirement Standard(s)
2	B27P3FU1 B27P3FU2 B27P3FU3 GRP-FUG EMISS B93P6FU3	OP-UA12	63FFFF-01	112(B) HAPS	40 CFR Part 63, Subpart FFFF [Pumps in heavy liquid service]	§ 63.2480(a)-Table 6.1.b § 63.162(a) § 63.162(c) [G]§ 63.162(f) [G]§ 63.162(g) § 63.162(h) [G]§ 63.169 [G]§ 63.171 § 63.2480(a) § 63.2480(b), § 63.2480(b)(7)
2	B27P3FU1 B27P3FU2 B27P3FU3 GRP-FUG EMISS B93P6FU3	OP-UA12	63FFFF-01	112(B) HAPS	40 CFR Part 63, Subpart FFFF [Valves in gas/vapor service and in light liquid service]	§ 63.2480(a)-Table 6.1.b § 63.162(a) § 63.162(c) [G]§ 63.162(f) [G]§ 63.162(g) § 63.162(h) [G]§ 63.168 [G]§ 63.171 [G]§ 63.175 § 63.2480(a) § 63.2480(b), § 63.2480(b)(7)

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Table 1a: Additions

Date: November 2, 2023	Regulated Entity No.: RN100225945	Permit No.: 03905
Company Name: The Dow Chemical Company	Area Name: Polyethylene	

Revision No.	Unit/Group/Process ID No.	Unit/Group/Process Applicable Form	SOP/GOP Index No	Pollutant	Applicable Regulatory Requirement Name	Applicable Regulatory Requirement Standard(s)
2	B27P3FU1 B27P3FU2 B27P3FU3 GRP-FUG EMISS B93P6FU3	OP-UA12	63FFFF-01	112(B) HAPS	40 CFR Part 63, Subpart FFFF [Connectors in gas/vapor service and in light liquid service]	§ 63.2480(a)-Table 6.1.b § 63.162(a), § 63.162(c) [G]§ 63.162(f) [G]§ 63.162(g) § 63.162(h) [G]§ 63.171 [G]§ 63.174 § 63.2480(a) § 63.2480(b) § 63.2480(b)(3), § 63.2480(b)(7) § 63.2480(b)(4)
2	B27P3FU1 B27P3FU2 B27P3FU3 GRP-FUG EMISS B93P6FU3	OP-UA12	63FFFF-01	112(B) HAPS	40 CFR Part 63, Subpart FFFF [Agitators gas/vapor service and in light liquid service]	§ 63.2480(a)-Table 6.1.b § 63.162(a), § 63.162(c) [G]§ 63.162(f) [G]§ 63.162(g) § 63.162(h) § 63.171 [G]§ 63.171 [G]§ 63.173 § 63.2480(a) § 63.2480(b), § 63.2480(b)(7)

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Table 1a: Additions

Date: November 2, 2023	Regulated Entity No.: RN100225945	Permit No.: 03905
Company Name: The Dow Chemical Company	Area Name: Polyethylene	

Revision No.	Unit/Group/Process ID No.	Unit/Group/Process Applicable Form	SOP/GOP Index No	Pollutant	Applicable Regulatory Requirement Name	Applicable Regulatory Requirement Standard(s)
2	B27P3FU1 B27P3FU2 B27P3FU3 GRP-FUG EMISS B93P6FU3	OP-UA12	63FFFF-01	112(B) HAPS	40 CFR Part 63, Subpart FFFF [pressure relief devices in liquid service, instrumentation systems, agitators in heavy liquid service, valves in heavy liquid service]	§ 63.2480(a)-Table 6.1.b § 63.162(a) § 63.162(c) [G]§ 63.162(f) [G]§ 63.162(g) § 63.162(h) [G]§ 63.169 [G]§ 63.171 § 63.2480(a) § 63.2480(b) § 63.2480(b)(7)
2	B27P3FU1 B27P3FU2 B27P3FU3 GRP-FUG EMISS B93P6FU3	OP-UA12	63FFFF-01	112(B) HAPS	40 CFR Part 63, Subpart FFFF [pressure relief device in organic HAP gas or vapor service with an instrument reading of less than 500 ppm above background]	§ 63.2480(e)(1) § 63.2480(a) [G]§ 63.2480(e)(2) [G]§ 63.2480(e)(3)(ii) § 63.2480(e)(3)(v) [G]§ 63.2480(e)(4) [G]§ 63.2480(e)(6) [G]§ 63.2480(e)(7)

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Table 1a: Additions

Date: November 2, 2023	Regulated Entity No.: RN100225945	Permit No.: 03905
Company Name: The Dow Chemical Company	Area Name: Polyethylene	

Revision No.	Unit/Group/Process ID No.	Unit/Group/Process Applicable Form	SOP/GOP Index No	Pollutant	Applicable Regulatory Requirement Name	Applicable Regulatory Requirement Standard(s)
8	<i>B93P5PV51D</i>	<i>OP-UA28</i>	<i>60DDD-01</i>	<i>VOC/TOC</i>	<i>40 CFR Part 60, Subpart DDD</i>	<i>§ 60.560(g)</i>
8	<i>B93P6PV51D</i>	<i>OP-UA28</i>	<i>60DDD-01</i>	<i>VOC/TOC</i>	<i>40 CFR Part 60, Subpart DDD</i>	<i>§ 60.560(g)</i>

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Table 1b: Additions

Date: November 2, 2023	Regulated Entity No.: RN100225945	Permit No.: 03905
Company Name: The Dow Chemical Company	Area Name: Polyethylene	

Revision No.	Unit/Group/ Process ID No.	SOP/GOP Index No.	Pollutant	Monitoring and Testing Requirements	Recordkeeping Requirements	Reporting Requirements
2	B93P5F1	63FFFF-01	112(B) HAPS	[G]§ 63.115(d)(2)(v) § 63.115(d)(3)(iii) § 63.983(b) [G]§ 63.983(b)(1) [G]§ 63.983(b)(2) [G]§ 63.983(b)(3) [G]§ 63.983(c)(1) § 63.983(c)(2) § 63.983(c)(3) § 63.983(d)(1) § 63.983(d)(1)(ii) § 63.987(e) § 63.997(b) § 63.997(e)(2) § 63.997(e)(3) § 63.997(e)(3)(i) § 63.997(e)(3)(iii) § 63.2450(k)(1)(ii)	§ 63.2450(f)(2) § 63.2450(f)(2)(i) § 63.2450(f)(2)(ii) § 63.983(b) [G]§ 63.983(d)(2) § 63.987(e) § 63.998(a)(1)(iii) § 63.998(a)(1)(iii)(A) § 63.998(a)(1)(iii)(B) [G]§ 63.998(b)(1) [G]§ 63.998(b)(2) [G]§ 63.998(b)(3) [G]§ 63.998(b)(5) [G]§ 63.998(d)(1) § 63.998(d)(3)(i) § 63.998(d)(3)(iii) § 63.998(d)(5) § 63.2525(m) § 63.2525(n) § 63.2525(p)	§ 63.2450(f)(2)(ii) § 63.2450(g) § 63.997(b)(2) § 63.997(c)(3) § 63.998(a)(1)(iii)(A) [G]§ 63.998(b)(3) [G]§ 63.999(a)(1) § 63.999(b)(5) § 63.999(c)(1) § 63.999(c)(2)(i) § 63.999(c)(3) § 63.999(c)(6) [G]§ 63.999(c)(6)(i) § 63.999(c)(6)(iv) [G]§ 63.999(d)(1) [G]§ 63.999(d)(2) § 63.2520(d)(3) § 63.2520(e)

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Table 1b: Additions

Date: November 2, 2023	Regulated Entity No.: RN100225945	Permit No.: 03905
Company Name: The Dow Chemical Company	Area Name: Polyethylene	

Revision No.	Unit/Group/ Process ID No.	SOP/GOP Index No.	Pollutant	Monitoring and Testing Requirements	Recordkeeping Requirements	Reporting Requirements
2	B93P5F1	63FFFF-02	112(B) HAPS	[G]§ 63.115(d)(2)(v) § 63.115(d)(3)(iii) § 63.983(b) [G]§ 63.983(b)(1) [G]§ 63.983(b)(2) [G]§ 63.983(b)(3) [G]§ 63.983(c)(1) § 63.983(c)(2) § 63.983(c)(3) § 63.983(d)(1) § 63.983(d)(1)(ii) [G]§ 63.987(b)(3)(i) § 63.987(b)(3)(ii) § 63.987(b)(3)(iii) § 63.987(b)(3)(iv) § 63.987(e) § 63.997(a) [G]§ 63.997(c)(1) § 63.997(c)(2) § 63.997(c)(3) § 63.997(c)(3)(i) § 63.997(c)(3)(ii) § 63.2450(k)(1)(ii)	§ 63.2450(f)(2) § 63.2450(f)(2)(i) § 63.2450(f)(2)(ii) § 63.983(b) [G]§ 63.983(d)(2) § 63.987(b)(1) § 63.987(c) § 63.998(a)(1) [G]§ 63.998(a)(1)(i) § 63.998(a)(1)(iii) § 63.998(a)(1)(iii)(A) § 63.998(a)(1)(iii)(B) [G]§ 63.998(b)(1) [G]§ 63.998(b)(2) [G]§ 63.998(b)(3) [G]§ 63.998(b)(5) [G]§ 63.998(d)(1) § 63.998(d)(3)(i) § 63.998(d)(3)(ii) § 63.998(d)(5) § 63.2525(m) § 63.2525(n) § 63.2525(p)	§ 63.2450(f)(2)(ii) § 63.2450(q) § 63.987(b)(1) § 63.997(c)(3) § 63.998(a)(1)(iii)(A) [G]§ 63.998(b)(3) [G]§ 63.999(a)(1) [G]§ 63.999(a)(2) § 63.999(b)(5) § 63.999(c)(1) § 63.999(c)(2)(i) § 63.999(c)(3) § 63.999(c)(6) [G]§ 63.999(c)(6)(i) § 63.999(c)(6)(iv) [G]§ 63.999(d)(1) [G]§ 63.999(d)(2) § 63.2520(d)(3) § 63.2520(e)

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Table 1b: Additions

Date: November 2, 2023	Regulated Entity No.: RN100225945	Permit No.: 03905
Company Name: The Dow Chemical Company	Area Name: Polyethylene	

Revision No.	Unit/Group/Process ID No.	SOP/GOP Index No.	Pollutant	Monitoring and Testing Requirements	Recordkeeping Requirements	Reporting Requirements
2	B93P5DU713	63FFFF-01	112(B) HAPS	[G]§ 63.115(d)(2)(v) § 63.115(d)(3)(iii) § 63.983(a)(3) § 63.983(a)(3)(ii) § 63.983(b) [G]§ 63.983(b)(1) [G]§ 63.983(b)(2) [G]§ 63.983(b)(3) [G]§ 63.983(b)(4) [G]§ 63.983(c)(1) § 63.983(c)(2) § 63.983(c)(3) § 63.983(d)(1) § 63.983(d)(1)(ii) [G]§ 63.987(b)(3)(i), § 63.987(b)(3)(ii) § 63.987(b)(3)(iii), § 63.987(b)(3)(iv) § 63.987(e), § 63.997(a) [G]§ 63.997(e)(1), § 63.997(e)(2) § 63.997(e)(3), § 63.997(e)(3)(i) § 63.997(e)(3)(ii) § 63.2450(k)(1)(ii)	§ 63.2450(f)(2) § 63.2450(f)(2)(i) § 63.2450(f)(2)(ii) § 63.983(a)(3)(ii) § 63.983(b) [G]§ 63.983(d)(2) § 63.987(b)(1), § 63.987(e) § 63.998(a)(1) [G]§ 63.998(a)(1)(i) § 63.998(a)(1)(iii) § 63.998(a)(1)(iii)(A) § 63.998(a)(1)(iii)(B) [G]§ 63.998(b)(1) [G]§ 63.998(b)(2) [G]§ 63.998(b)(3) [G]§ 63.998(b)(5) [G]§ 63.998(d)(1) § 63.998(d)(3)(i) § 63.998(d)(3)(ii) § 63.998(d)(5) § 63.2525(m) § 63.2525(n)	§ 63.2450(f)(2)(ii) § 63.2450(q) § 63.987(b)(1) § 63.997(c)(3) § 63.998(a)(1)(iii)(A) [G]§ 63.998(b)(3) [G]§ 63.999(a)(1) [G]§ 63.999(a)(2) § 63.999(b)(5) § 63.999(c)(1) § 63.999(c)(2)(i) § 63.999(c)(2)(iii) § 63.999(c)(3) § 63.999(c)(6) [G]§ 63.999(c)(6)(i) § 63.999(c)(6)(iv) [G]§ 63.999(d)(1) [G]§ 63.999(d)(2) § 63.2520(d)(3) § 63.2520(e)(11) § 63.2520(e)(12)

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Table 1b: Additions

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Company Name: The Dow Chemical Company	Area Name: Polyethylene	

Revision No.	Unit/Group/ Process ID No.	SOP/GOP Index No.	Pollutant	Monitoring and Testing Requirements	Recordkeeping Requirements	Reporting Requirements
2	B93P5H510	63FFFF-01	112(B) HAPS	[G]§ 63.115(d)(2)(v), § 63.115(d)(3)(iii) § 63.2450(g) § 63.2450(g)(1) § 63.2450(g)(2) [G]§ 63.2450(g)(3), § 63.2450(k)(6) § 63.2450(g)(4) § 63.983(a)(3), § 63.983(a)(3)(i) § 63.983(b), [G]§ 63.983(b)(1) [G]§ 63.983(b)(2), [G]§ 63.983(b)(3) [G]§ 63.983(b)(4), [G]§ 63.983(c)(1) § 63.983(c)(2) § 63.983(c)(3) § 63.983(d)(1) § 63.983(d)(1)(ii) § 63.996(b)(1) § 63.996(b)(1)(i) § 63.996(b)(2) § 63.997(c)(2) § 63.997(c)(3) § 63.997(c)(3)(iii), § 63.2450(g)(6)	§ 63.2450(k)(6) § 63.2525(g) § 63.2525(h) § 63.983(a)(3)(i) § 63.983(b) [G]§ 63.983(d)(2) § 63.996(c)(2)(iii) § 63.998(a)(2)(ii)(B)(5) [G]§ 63.998(b)(1) [G]§ 63.998(b)(2)(i)-(ii) [G]§ 63.998(b)(3) [G]§ 63.998(b)(5) [G]§ 63.998(c)(1) § 63.998(c)(2)(iii) § 63.998(c)(3)(iii) [G]§ 63.998(d)(1) § 63.998(d)(3)(i) § 63.998(d)(3)(ii) § 63.998(d)(5) § 63.2525(n), § 63.2525(p) § 63.2525(l), § 63.2450(k)(1)(ii) § 63.2450(k)(7)	§ 63.2450(e) § 63.996(b)(2) § 63.996(c)(6) § 63.997(c)(3) [G]§ 63.998(b)(3) [G]§ 63.999(a)(1) [G]§ 63.999(b)(3) § 63.999(b)(5) § 63.999(c)(1) § 63.999(c)(2)(i) § 63.999(c)(2)(ii) § 63.999(c)(6) [G]§ 63.999(c)(6)(i) § 63.999(c)(6)(iv) § 63.2450(g)(5) § 63.2520(e) § 63.2520(d)

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Table 1b: Additions

Date: November 2, 2023	Regulated Entity No.: RN100225945	Permit No.: 03905
Company Name: The Dow Chemical Company	Area Name: Polyethylene	

Revision No.	Unit/Group/ Process ID No.	SOP/GOP Index No.	Pollutant	Monitoring and Testing Requirements	Recordkeeping Requirements	Reporting Requirements
3	B93P6DU713	63FFFF-01	112(B) HAPS	§ 63.115(d) [G]§ 63.115(d)(1) § 63.115(d)(2) § 63.115(d)(2)(i) [G]§ 63.115(d)(2)(ii) § 63.115(d)(2)(iii) § 63.115(d)(2)(iv) § 63.115(d)(3)(i) § 63.115(d)(3)(ii) [G]§ 63.115(d)(2)(v) § 63.115(d)(3)(iii) § 63.983(a)(3) § 63.983(a)(3)(ii) § 63.983(b) [G]§ 63.983(b)(1) [G]§ 63.983(b)(2) [G]§ 63.983(b)(3) [G]§ 63.983(b)(4) [G]§ 63.983(c)(1) § 63.983(c)(2) § 63.983(c)(3) § 63.983(d)(1) § 63.983(d)(1)(ii) § 63.2450(k)(1)(ii)	None § 63.983(a)(3)(ii) § 63.983(b) [G]§ 63.983(d)(2) § 63.2525(m) § 63.2525(n)	None § 63.2520(d)(3) § 63.2520(e)(11) § 63.2520(e)(12)

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Table 1b: Additions

Date: November 2, 2023	Regulated Entity No.: RN100225945	Permit No.: 03905
Company Name: The Dow Chemical Company	Area Name: Polyethylene	

Revision No.	Unit/Group/ Process ID No.	SOP/GOP Index No.	Pollutant	Monitoring and Testing Requirements	Recordkeeping Requirements	Reporting Requirements
2	B93P6H510	63FFFF-01	112(B) HAPS	<p>[G]§ 63.115(d)(2)(v), § 63.115(d)(3)(iii) § 63.2450(g) § 63.2450(g)(1) § 63.2450(g)(2) [G]§ 63.2450(g)(3), § 63.2450(k)(6) § 63.2450(g)(4) § 63.983(a)(3), § 63.983(a)(3)(i) § 63.983(b), [G]§ 63.983(b)(1) [G]§ 63.983(b)(2), [G]§ 63.983(b)(3) [G]§ 63.983(b)(4), [G]§ 63.983(c)(1) § 63.983(c)(2) § 63.983(c)(3) § 63.983(d)(1) § 63.983(d)(1)(ii) § 63.996(b)(1) § 63.996(b)(1)(i) § 63.996(b)(2) § 63.997(c)(2) § 63.997(c)(3) § 63.997(c)(3)(iii), § 63.2450(g)(6)</p>	<p>§ 63.2450(k)(6) § 63.2525(g) § 63.2525(h) § 63.983(a)(3)(i) § 63.983(b) [G]§ 63.983(d)(2) § 63.996(c)(2)(iii) § 63.998(a)(2)(ii)(B)(5) [G]§ 63.998(b)(1) [G]§ 63.998(b)(2)(i)-(ii) [G]§ 63.998(b)(3) [G]§ 63.998(b)(5) [G]§ 63.998(c)(1) § 63.998(c)(2)(iii) § 63.998(c)(3)(iii) [G]§ 63.998(d)(1) § 63.998(d)(3)(i) § 63.998(d)(3)(ii) § 63.998(d)(5) § 63.2525(n), § 63.2525(p) § 63.2525(l), § 63.2450(k)(1)(ii) § 63.2450(k)(7)</p>	<p>§ 63.2450(q) § 63.996(b)(2) § 63.996(c)(6) § 63.997(c)(3) [G]§ 63.998(b)(3) [G]§ 63.999(a)(1) [G]§ 63.999(b)(3) § 63.999(b)(5) § 63.999(c)(1) § 63.999(c)(2)(i) § 63.999(c)(2)(ii) § 63.999(c)(6) [G]§ 63.999(c)(6)(i) § 63.999(c)(6)(iv) §63.2450(g)(5) §63.2520(e) §63.2520(d)</p>

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Table 1b: Additions

Date: November 2, 2023	Regulated Entity No.: RN100225945	Permit No.: 03905
Company Name: The Dow Chemical Company	Area Name: Polyethylene	

Revision No.	Unit/Group/ Process ID No.	SOP/GOP Index No.	Pollutant	Monitoring and Testing Requirements	Recordkeeping Requirements	Reporting Requirements
4	B93P5ST816	63FFFF-01	112(B) HAPS	[G]§ 63.115(d)(2)(v) § 63.115(d)(3)(iii) § 63.2470(c)(1) § 63.983(b) [G]§ 63.983(b)(1) [G]§ 63.983(b)(2) [G]§ 63.983(b)(3) [G]§ 63.983(c)(1) § 63.983(c)(2) § 63.983(c)(3) § 63.983(d)(1) § 63.983(d)(1)(ii) § 63.987(e) § 63.997(b) § 63.997(c)(2) § 63.997(c)(3) § 63.997(c)(3)(i) § 63.997(c)(3)(iii) § 63.2450(k)(1)(ii)	§ 63.2450(f)(2) § 63.2450(f)(2)(i) § 63.2450(f)(2)(ii) § 63.2470(c)(1) § 63.983(b) [G]§ 63.983(d)(2) § 63.987(e) § 63.998(a)(1)(iii) § 63.998(a)(1)(iii)(A) § 63.998(a)(1)(iii)(B) [G]§ 63.998(b)(1) [G]§ 63.998(b)(2) [G]§ 63.998(b)(3) [G]§ 63.998(b)(5) [G]§ 63.998(c)(1) [G]§ 63.998(d)(1) § 63.998(d)(3)(i) § 63.998(d)(3)(ii) § 63.998(d)(5) § 63.2525(m) § 63.2525(n)	§ 63.2450(f)(2)(ii) § 63.2450(q) § 63.2470(d) § 63.997(b)(2) § 63.997(c)(3) § 63.998(a)(1)(iii)(A) [G]§ 63.998(b)(3) [G]§ 63.999(a)(1) § 63.999(b)(5) § 63.999(c)(1) § 63.999(c)(2)(i) § 63.999(c)(3) § 63.999(c)(6) [G]§ 63.999(c)(6)(i) § 63.999(c)(6)(iv) [G]§ 63.999(d)(1) [G]§ 63.999(d)(2) § 63.2520(d)(3) § 63.2520(e)

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Table 1b: Additions

Date: November 2, 2023	Regulated Entity No.: RN100225945	Permit No.: 03905
Company Name: The Dow Chemical Company	Area Name: Polyethylene	

Revision No.	Unit/Group/Process ID No.	SOP/GOP Index No.	Pollutant	Monitoring and Testing Requirements	Recordkeeping Requirements	Reporting Requirements
4	GRP-TANK 1 [B93P5ST811, B93P5ST812]	63FFFF-01	112(B) HAPS	[G]§ 63.115(d)(2)(v) § 63.115(d)(3)(iii) § 63.2470(c)(1) § 63.983(b) [G]§ 63.983(b)(1) [G]§ 63.983(b)(2) [G]§ 63.983(b)(3) [G]§ 63.983(c)(1) § 63.983(c)(2) § 63.983(c)(3) § 63.983(d)(1) § 63.983(d)(1)(ii) § 63.987(e) § 63.997(b) § 63.997(c)(2) § 63.997(c)(3) § 63.997(c)(3)(i) § 63.997(c)(3)(iii) § 63.2450(k)(1)(ii)	§ 63.2450(f)(2) § 63.2450(f)(2)(i) § 63.2450(f)(2)(ii) § 63.2470(c)(1) § 63.983(b) [G]§ 63.983(d)(2) § 63.987(e) § 63.998(a)(1)(iii) § 63.998(a)(1)(iii)(A) § 63.998(a)(1)(iii)(B) [G]§ 63.998(b)(1) [G]§ 63.998(b)(2) [G]§ 63.998(b)(3) [G]§ 63.998(b)(5) [G]§ 63.998(c)(1) [G]§ 63.998(c)(1) [G]§ 63.998(d)(1) § 63.998(d)(3)(i) § 63.998(d)(3)(ii) § 63.998(d)(5) § 63.2525(m) § 63.2525(n)	§ 63.2450(f)(2)(ii) § 63.2450(q) § 63.2470(d) § 63.997(b)(2) § 63.997(c)(3) § 63.998(a)(1)(iii)(A) [G]§ 63.998(b)(3) [G]§ 63.999(a)(1) § 63.999(b)(5) § 63.999(c)(1) § 63.999(c)(2)(i) § 63.999(c)(3) § 63.999(c)(6) [G]§ 63.999(c)(6)(i) § 63.999(c)(6)(iv) [G]§ 63.999(d)(1) [G]§ 63.999(d)(2) § 63.2520(d)(3) § 63.2520(e)

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Table 1b: Additions

Date: November 2, 2023	Regulated Entity No.: RN100225945	Permit No.: 03905
Company Name: The Dow Chemical Company	Area Name: Polyethylene	

Revision No.	Unit/Group/Process ID No.	SOP/GOP Index No.	Pollutant	Monitoring and Testing Requirements	Recordkeeping Requirements	Reporting Requirements
4	<u>GRP-TANK 2</u> [B93P5ST311, B93P5ST412, B93P5ST413, B93P5ST414, B93P5ST611]	63FFFF-01	112(B) HAPS	[G]§ 63.115(d)(2)(v) § 63.115(d)(3)(iii) § 63.2470(c)(1) § 63.983(b) [G]§ 63.983(b)(1) [G]§ 63.983(b)(2) [G]§ 63.983(b)(3) [G]§ 63.983(c)(1) § 63.983(c)(2) § 63.983(c)(3) § 63.983(d)(1) § 63.983(d)(1)(ii) § 63.987(e) § 63.997(b) § 63.997(c)(2) § 63.997(c)(3) § 63.997(c)(3)(i) § 63.997(c)(3)(iii) § 63.2450(k)(1)(ii)	§ 63.2450(f)(2) § 63.2450(f)(2)(i) § 63.2450(f)(2)(ii) § 63.2470(c)(1) § 63.983(b) [G]§ 63.983(d)(2) § 63.987(e) § 63.998(a)(1)(iii) § 63.998(a)(1)(iii)(A) § 63.998(a)(1)(iii)(B) [G]§ 63.998(b)(1) [G]§ 63.998(b)(2) [G]§ 63.998(b)(3) [G]§ 63.998(b)(5) [G]§ 63.998(c)(1) [G]§ 63.998(d)(1) § 63.998(d)(3)(i) § 63.998(d)(3)(ii) § 63.998(d)(5) § 63.2525(m) § 63.2525(n)	§ 63.2450(f)(2)(ii) § 63.2450(q) § 63.2470(d) § 63.997(b)(2) § 63.997(c)(3) § 63.998(a)(1)(iii)(A) [G]§ 63.998(b)(3) [G]§ 63.999(a)(1) § 63.999(b)(5) § 63.999(c)(1) § 63.999(c)(2)(i) § 63.999(c)(3) § 63.999(c)(6) [G]§ 63.999(c)(6)(i) § 63.999(c)(6)(iv) [G]§ 63.999(d)(1) [G]§ 63.999(d)(2) § 63.2520(d)(3) § 63.2520(e)

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Table 1b: Additions

Date: November 2, 2023	Regulated Entity No.: RN100225945	Permit No.: 03905
Company Name: The Dow Chemical Company	Area Name: Polyethylene	

Revision No.	Unit/Group/Process ID No.	SOP/GOP Index No.	Pollutant	Monitoring and Testing Requirements	Recordkeeping Requirements	Reporting Requirements
4	<u>GRP-TANK 3</u> [B93P5ST806, B93P5ST807, B93P5ST809]	63FFFF-01	112(B) HAPS	[G]§ 63.115(d)(2)(v) § 63.115(d)(3)(iii) § 63.2470(c)(1) § 63.983(b) [G]§ 63.983(b)(1) [G]§ 63.983(b)(2) [G]§ 63.983(b)(3) [G]§ 63.983(c)(1) § 63.983(c)(2) § 63.983(c)(3) § 63.983(d)(1) § 63.983(d)(1)(ii) § 63.987(e) § 63.997(b) § 63.997(c)(2) § 63.997(c)(3) § 63.997(c)(3)(i) § 63.997(c)(3)(iii) § 63.2450(k)(1)(ii)	§ 63.2450(f)(2) § 63.2450(f)(2)(i) § 63.2450(f)(2)(ii) § 63.2470(c)(1) § 63.983(b) [G]§ 63.983(d)(2) § 63.987(e) § 63.998(a)(1)(iii) § 63.998(a)(1)(iii)(A) § 63.998(a)(1)(iii)(B) [G]§ 63.998(b)(1) [G]§ 63.998(b)(2) [G]§ 63.998(b)(3) [G]§ 63.998(b)(5) [G]§ 63.998(c)(1) [G]§ 63.998(d)(1) § 63.998(d)(3)(i) § 63.998(d)(3)(ii) § 63.998(d)(5) § 63.2525(m) § 63.2525(n)	§ 63.2450(f)(2)(ii) § 63.2450(q) § 63.2470(d) § 63.997(b)(2) § 63.997(c)(3) § 63.998(a)(1)(iii)(A) [G]§ 63.998(b)(3) [G]§ 63.999(a)(1) § 63.999(b)(5) § 63.999(c)(1) § 63.999(c)(2)(i) § 63.999(c)(3) § 63.999(c)(6) [G]§ 63.999(c)(6)(i) § 63.999(c)(6)(iv) [G]§ 63.999(d)(1) [G]§ 63.999(d)(2) § 63.2520(d)(3) § 63.2520(e)

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Table 1b: Additions

Date: November 2, 2023	Regulated Entity No.: RN100225945	Permit No.: 03905
Company Name: The Dow Chemical Company	Area Name: Polyethylene	

Revision No.	Unit/Group/ Process ID No.	SOP/GOP Index No.	Pollutant	Monitoring and Testing Requirements	Recordkeeping Requirements	Reporting Requirements
2	B93P5CT1	63FFFF-01	112(B) HAPS	[G]§ 63.104(e) None	[G]§ 63.104(e) [G]§ 63.104(e)(2) [G]§ 63.104(f)(1) § 63.2525(r)	[G]§ 63.104(f)(2) § 63.2525(e)(16)
2	B93P5LR1	63FFFF-01	112(B) HAPS	[G]§ 63.115(d)(2)(v) § 63.115(d)(3)(iii) § 63.983(b) [G]§ 63.983(b)(1) [G]§ 63.983(b)(2) [G]§ 63.983(b)(3) [G]§ 63.983(c)(1) § 63.983(c)(2) § 63.983(c)(3) § 63.983(d)(1) § 63.983(d)(1)(ii) § 63.987(e) § 63.997(b) § 63.997(c)(2) § 63.997(c)(3) § 63.997(c)(3)(i) § 63.2450(k)(1)(ii)	§ 63.2450(f)(2) § 63.2450(f)(2)(i) § 63.2450(f)(2)(ii) § 63.983(b) [G]§ 63.983(d)(2) § 63.987(e) § 63.998(a)(1)(iii) § 63.998(a)(1)(iii)(A) § 63.998(a)(1)(iii)(B) [G]§ 63.998(b)(1) [G]§ 63.998(b)(2) [G]§ 63.998(b)(3) [G]§ 63.998(b)(5) [G]§ 63.998(d)(1) § 63.998(d)(3)(i) § 63.998(d)(3)(ii) § 63.998(d)(5) § 63.2525(m) § 63.2525(n)	§ 63.2450(f)(2)(ii) § 63.2450(q) § 63.997(b)(2) § 63.997(c)(3) § 63.998(a)(1)(iii)(A) [G]§ 63.998(b)(3) [G]§ 63.999(a)(1) § 63.999(b)(5) § 63.999(c)(1) § 63.999(c)(2)(i) § 63.999(c)(3) § 63.999(c)(6) [G]§ 63.999(c)(6)(i) § 63.999(c)(6)(iv) [G]§ 63.999(d)(1) [G]§ 63.999(d)(2) § 63.2520(d)(3) § 63.2520(e)

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Table 1b: Additions

Date: November 2, 2023	Regulated Entity No.: RN100225945	Permit No.: 03905
Company Name: The Dow Chemical Company	Area Name: Polyethylene	

Revision No.	Unit/Group/ Process ID No.	SOP/GOP Index No.	Pollutant	Monitoring and Testing Requirements	Recordkeeping Requirements	Reporting Requirements
2	B93P5LR2	63FFFF-01	112(B) HAPS	[G]§ 63.115(d)(2)(v) § 63.115(d)(3)(iii) § 63.983(b) [G]§ 63.983(b)(1) [G]§ 63.983(b)(2) [G]§ 63.983(b)(3) [G]§ 63.983(c)(1) § 63.983(c)(2) § 63.983(c)(3) § 63.983(d)(1) § 63.983(d)(1)(ii) § 63.987(e) § 63.997(b) § 63.997(e)(2) § 63.997(e)(3) § 63.997(e)(3)(i) § 63.2450(k)(1)(ii)	§ 63.2450(f)(2) § 63.2450(f)(2)(i) § 63.2450(f)(2)(ii) § 63.983(b) [G]§ 63.983(d)(2) § 63.987(e) § 63.998(a)(1)(iii) § 63.998(a)(1)(iii)(A) § 63.998(a)(1)(iii)(B) [G]§ 63.998(b)(1) [G]§ 63.998(b)(2) [G]§ 63.998(b)(3) [G]§ 63.998(b)(5) [G]§ 63.998(d)(1) § 63.998(d)(3)(i) § 63.998(d)(3)(ii) § 63.998(d)(5) § 63.2525(m) § 63.2525(n)	§ 63.2450(f)(2)(ii) § 63.2450(q) § 63.997(b)(2) § 63.997(c)(3) § 63.998(a)(1)(iii)(A) [G]§ 63.998(b)(3) [G]§ 63.999(a)(1) § 63.999(b)(5) § 63.999(c)(1) § 63.999(c)(2)(i) § 63.999(c)(3) § 63.999(c)(6) [G]§ 63.999(c)(6)(i) § 63.999(c)(6)(iv) [G]§ 63.999(d)(1) [G]§ 63.999(d)(2) § 63.2520(d)(3) § 63.2520(e)

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Table 1b: Additions

Date: November 2, 2023	Regulated Entity No.: RN100225945	Permit No.: 03905
Company Name: The Dow Chemical Company	Area Name: Polyethylene	

Revision No.	Unit/Group/ Process ID No.	SOP/GOP Index No.	Pollutant	Monitoring and Testing Requirements	Recordkeeping Requirements	Reporting Requirements
5	<i>B93P5LR3</i>	63FFFF-01	112(B) HAPS	<i>[G]§ 63.115(d)(2)(v)</i> <i>§ 63.983(b)</i> <i>[G]§ 63.983(b)(1)</i> <i>[G]§ 63.983(b)(2)</i> <i>[G]§ 63.983(b)(3)</i> <i>[G]§ 63.983(c)(1)</i> <i>§ 63.983(c)(2)</i> <i>§ 63.983(c)(3)</i> <i>§ 63.983(d)(1)</i> <i>§ 63.983(d)(1)(ii)</i> <i>§ 63.2450(k)(1)(ii)</i>	<i>§ 63.983(b)</i> <i>[G]§ 63.983(d)(2)</i> <i>§ 63.2525(m)</i> <i>§ 63.2525(n)</i>	<i>§ 63.2520(d)(3)</i> <i>§ 63.2520(e)</i>

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Table 1b: Additions

Date: November 2, 2023	Regulated Entity No.: RN100225945	Permit No.: 03905
Company Name: The Dow Chemical Company	Area Name: Polyethylene	

Revision No.	Unit/Group/ Process ID No.	SOP/GOP Index No.	Pollutant	Monitoring and Testing Requirements	Recordkeeping Requirements	Reporting Requirements
2	PROP3	63FFFF-01	112(B) HAPS	§ 63.2445(d) § 63.2460(c)(2)(v)	§ 63.2525 § 63.2525(a) [G]§ 63.2525(b) § 63.2525(c) § 63.2525(e) [G]§ 63.2525(e)(1) § 63.2525(f) § 63.2525(j) 63.2525(p)	§ 63.2435(d) § 63.2445(c) § 63.2450(g)(5) § 63.2450(m) § 63.2450(m)(1), § 63.2450(m)(2) § 63.2460(c)(1) § 63.2515(a), § 63.2515(b)(1), § 63.2515(c) § 63.2520(a), [G]§ 63.2520(b) [G]§ 63.2520(c), [G]§ 63.2520(d) § 63.2520(e), § 63.2520(e)(1) [G]§ 63.2520(e)(10) § 63.2520(e)(2) § 63.2520(e)(3) § 63.2520(e)(4) § 63.2520(e)(5) § 63.2520(e)(5)(i) [G]§ 63.2520(e)(5)(ii) [G]§ 63.2520(e)(5)(iii) § 63.2520(e)(6) § 63.2520(e)(7) § 63.2520(e)(9) 63.2520(e)(14)

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Table 1b: Additions

Date: November 2, 2023	Regulated Entity No.: RN100225945	Permit No.: 03905
Company Name: The Dow Chemical Company	Area Name: Polyethylene	

Revision No.	Unit/Group/ Process ID No.	SOP/GOP Index No.	Pollutant	Monitoring and Testing Requirements	Recordkeeping Requirements	Reporting Requirements
2	PROP4	63FFFF-01	112(B) HAPS	§ 63.2445(d)	§ 63.2525 § 63.2525(a) [G]§ 63.2525(b) § 63.2525(c) § 63.2525(f) § 63.2525(j) 63.2525(p)	§ 63.2435(d) § 63.2445(c) § 63.2450(g)(5) § 63.2450(m) § 63.2450(m)(1), § 63.2450(m)(2) § 63.2515(a), § 63.2515(b)(1), § 63.2515(c) § 63.2520(a), [G]§ 63.2520(b) [G]§ 63.2520(c), [G]§ 63.2520(d) § 63.2520(e), § 63.2520(e)(1) [G]§ 63.2520(e)(10) § 63.2520(e)(2) § 63.2520(e)(3) § 63.2520(e)(4) § 63.2520(e)(5) § 63.2520(e)(5)(i) [G]§ 63.2520(e)(5)(ii) [G]§ 63.2520(e)(5)(iii) § 63.2520(e)(6) § 63.2520(e)(7) § 63.2520(e)(9) 63.2520(e)(14)

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Table 1b: Additions

Date: November 2, 2023	Regulated Entity No.: RN100225945	Permit No.: 03905
Company Name: The Dow Chemical Company	Area Name: Polyethylene	

Revision No.	Unit/Group/ Process ID No.	SOP/GOP Index No.	Pollutant	Monitoring and Testing Requirements	Recordkeeping Requirements	Reporting Requirements
2	PROP5A	63FFFF-01	112(B) HAPS	§ 63.2445(d) § 63.2460(c)(2)(v)	§ 63.2525 § 63.2525(a) [G]§ 63.2525(b) § 63.2525(c) § 63.2525(e) § 63.2525(e)(2) § 63.2525(e)(3) [G]§ 63.2525(e)(4) § 63.2525(f) § 63.2525(j) 63.2525(p)	§ 63.2435(d) § 63.2445(c) § 63.2450(g)(5) § 63.2450(m) § 63.2450(m)(1), § 63.2450(m)(2) § 63.2460(c)(1) § 63.2515(a), § 63.2515(b)(1), § 63.2515(c) § 63.2520(a), [G]§ 63.2520(b) [G]§ 63.2520(c), [G]§ 63.2520(d) § 63.2520(e), § 63.2520(e)(1) [G]§ 63.2520(e)(10) § 63.2520(e)(2) § 63.2520(e)(3) § 63.2520(e)(4) § 63.2520(e)(5) § 63.2520(e)(5)(i) [G]§ 63.2520(e)(5)(ii) [G]§ 63.2520(e)(5)(iii) § 63.2520(e)(6) § 63.2520(e)(7) § 63.2520(e)(9) 63.2520(e)(14)

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Table 1b: Additions

Date: November 2, 2023	Regulated Entity No.: RN100225945	Permit No.: 03905
Company Name: The Dow Chemical Company	Area Name: Polyethylene	

Revision No.	Unit/Group/ Process ID No.	SOP/GOP Index No.	Pollutant	Monitoring and Testing Requirements	Recordkeeping Requirements	Reporting Requirements
2	PROP5B	63FFFF-01	112(B) HAPS	[G]§ 63.115(d)(2)(v) § 63.115(d)(3)(iii) § 63.2460(c)(2)(i) § 63.2460(c)(2)(ii) § 63.2460(c)(2)(vi) § 63.2460(c)(3) § 63.2460(c)(3)(i) § 63.2460(c)(4) § 63.2460(c)(6) § 63.983(b) [G]§ 63.983(b)(1) [G]§ 63.983(b)(2) [G]§ 63.983(b)(3) [G]§ 63.983(c)(1) § 63.983(c)(2) § 63.983(c)(3) § 63.983(d)(1) § 63.983(d)(1)(ii) § 63.987(c), § 63.997(b) § 63.997(c)(2), § 63.997(c)(3) § 63.997(c)(3)(i), § 63.997(c)(3)(ii) § 63.2450(g)(6), § 63.2450(k)(1)(ii)	§ 63.2450(f)(2) § 63.2450(f)(2)(i) § 63.2450(f)(2)(ii) § 63.2460(c)(3)(ii) § 63.2460(c)(6) § 63.2525(g) § 63.983(b) [G]§ 63.983(d)(2) § 63.987(c), § 63.998(a)(1)(iii) § 63.998(a)(1)(iii)(A) § 63.998(a)(1)(iii)(B) [G]§ 63.998(b)(1) [G]§ 63.998(b)(2) [G]§ 63.998(b)(3) [G]§ 63.998(b)(5) [G]§ 63.998(c)(1) [G]§ 63.998(d)(1) § 63.998(d)(3)(i) § 63.998(d)(3)(ii) § 63.998(d)(5) § 63.2450(k)(7), § 63.2525(m), § 63.2525(n), § 63.2525(p)	§ 63.2450(f)(2)(ii) § 63.2450(q) § 63.2460(c)(3)(i) § 63.997(b)(2) § 63.997(c)(3) § 63.998(a)(1)(iii)(A) [G]§ 63.998(b)(3) [G]§ 63.999(a)(1) § 63.999(b)(5) § 63.999(c)(1) § 63.999(c)(2)(i) § 63.999(c)(3) § 63.999(c)(6) [G]§ 63.999(c)(6)(i) § 63.999(c)(6)(iv) [G]§ 63.999(d)(1) [G]§ 63.999(d)(2) § 63.999(c)(2)(ii), § 63.999(c)(2)(iii) § 63.2450(g)(5), § 63.2520(d)(3), (e)(11), (e)(12), § 63.2520(e)(14)

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Table 1b: Additions

Date: November 2, 2023	Regulated Entity No.: RN100225945	Permit No.: 03905
Company Name: The Dow Chemical Company	Area Name: Polyethylene	

Revision No.	Unit/Group/ Process ID No.	SOP/GOP Index No.	Pollutant	Monitoring and Testing Requirements	Recordkeeping Requirements	Reporting Requirements
2	PROP6A	63FFFF-01	112(B) HAPS	§ 63.2445(d) § 63.2460(c)(2)(v)	§ 63.2525 § 63.2525(a) [G]§ 63.2525(b) § 63.2525(c) § 63.2525(e) § 63.2525(e)(2) § 63.2525(e)(3) [G]§ 63.2525(e)(4) § 63.2525(f) § 63.2525(j) 63.2525(p)	§ 63.2435(d) § 63.2445(c) § 63.2450(g)(5) § 63.2450(m) § 63.2450(m)(1), § 63.2450(m)(2) § 63.2460(c)(1) § 63.2515(a), § 63.2515(b)(1), § 63.2515(c) § 63.2520(a), [G]§ 63.2520(b) [G]§ 63.2520(c), [G]§ 63.2520(d) § 63.2520(e), § 63.2520(e)(1) [G]§ 63.2520(e)(10) § 63.2520(e)(2) § 63.2520(e)(3) § 63.2520(e)(4) § 63.2520(e)(5) § 63.2520(e)(5)(i) [G]§ 63.2520(e)(5)(ii) [G]§ 63.2520(e)(5)(iii) § 63.2520(e)(6) § 63.2520(e)(7) § 63.2520(e)(9) 63.2520(e)(14)

**Applicable Requirements Summary
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Table 1b: Additions

Date: November 2, 2023	Regulated Entity No.: RN100225945	Permit No.: 03905
Company Name: The Dow Chemical Company	Area Name: Polyethylene	

Revision No.	Unit/Group/ Process ID No.	SOP/GOP Index No.	Pollutant	Monitoring and Testing Requirements	Recordkeeping Requirements	Reporting Requirements
2	PROP6B	63FFFF-01	112(B) HAPS	[G]§ 63.115(d)(2)(v) § 63.115(d)(3)(iii) § 63.2460(c)(2)(i) § 63.2460(c)(2)(ii) § 63.2460(c)(2)(vi) § 63.2460(c)(3) § 63.2460(c)(3)(i) § 63.2460(c)(4) § 63.2460(c)(6) § 63.983(b) [G]§ 63.983(b)(1) [G]§ 63.983(b)(2) [G]§ 63.983(b)(3) [G]§ 63.983(c)(1) § 63.983(c)(2) § 63.983(c)(3) § 63.983(d)(1) § 63.983(d)(1)(ii) § 63.987(c), § 63.997(b) § 63.997(c)(2), § 63.997(c)(3) § 63.997(c)(3)(i), § 63.997(c)(3)(ii) § 63.2450(g)(6), § 63.2450(k)(1)(ii)	§ 63.2450(f)(2) § 63.2450(f)(2)(i) § 63.2450(f)(2)(ii) § 63.2460(c)(3)(ii) § 63.2460(c)(6) § 63.2525(g) § 63.983(b) [G]§ 63.983(d)(2) § 63.987(c), § 63.998(a)(1)(iii) § 63.998(a)(1)(iii)(A) § 63.998(a)(1)(iii)(B) [G]§ 63.998(b)(1) [G]§ 63.998(b)(2) [G]§ 63.998(b)(3) [G]§ 63.998(b)(5) [G]§ 63.998(c)(1) [G]§ 63.998(d)(1) § 63.998(d)(3)(i) § 63.998(d)(3)(ii) § 63.998(d)(5) § 63.2450(k)(7), § 63.2525(m), § 63.2525(n), § 63.2525(p)	§ 63.2450(f)(2)(ii) § 63.2450(q) § 63.2460(c)(3)(i) § 63.997(b)(2) § 63.997(c)(3) § 63.998(a)(1)(iii)(A) [G]§ 63.998(b)(3) [G]§ 63.999(a)(1) § 63.999(b)(5) § 63.999(c)(1) § 63.999(c)(2)(i) § 63.999(c)(3) § 63.999(c)(6) [G]§ 63.999(c)(6)(i) § 63.999(c)(6)(iv) [G]§ 63.999(d)(1) [G]§ 63.999(d)(2) § 63.999(c)(2)(ii), § 63.999(c)(2)(iii) § 63.2450(g)(5), § 63.2520(d)(3), (e)(11), (e)(12), § 63.2520(e)(14)

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Table 1b: Additions

Date: November 2, 2023	Regulated Entity No.: RN100225945	Permit No.: 03905
Company Name: The Dow Chemical Company	Area Name: Polyethylene	

Revision No.	Unit/Group/Process ID No.	SOP/GOP Index No.	Pollutant	Monitoring and Testing Requirements	Recordkeeping Requirements	Reporting Requirements
2	B27P3FU1 B27P3FU2 B27P3FU3 GRP-FUG EMISS B93P6FU3	63FFFF-01	112(B) HAPS	[G]§ 63.169 [G]§ 63.180(b) [G]§ 63.180(d)	§ 63.181(a) [G]§ 63.181(b) § 63.181(c) [G]§ 63.181(d) [G]§ 63.181(i)	[G]§ 63.182(a) [G]§ 63.182(b) § 63.182(c) [G]§ 63.182(c)(1) § 63.182(c)(4) [G]§ 63.182(d) § 63.2450(q)
2	B27P3FU1 B27P3FU2 B27P3FU3 GRP-FUG EMISS B93P6FU3	63FFFF-01	112(B) HAPS	[G]§ 63.180(b) [G]§ 63.180(d)	§ 63.181(a) [G]§ 63.181(b) § 63.181(c) [G]§ 63.181(i)	[G]§ 63.182(a) [G]§ 63.182(b) § 63.182(c) [G]§ 63.182(c)(1) § 63.182(c)(4) [G]§ 63.182(d) § 63.2450(q)

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Table 1b: Additions

Date: November 2, 2023	Regulated Entity No.: RN100225945	Permit No.: 03905
Company Name: The Dow Chemical Company	Area Name: Polyethylene	

Revision No.	Unit/Group/Process ID No.	SOP/GOP Index No.	Pollutant	Monitoring and Testing Requirements	Recordkeeping Requirements	Reporting Requirements
2	B27P3FU1 B27P3FU2 B27P3FU3 GRP-FUG EMISS B93P6FU3	63FFFF-01	112(B) HAPS	[G]§ 63.175 [G]§ 63.180(b) [G]§ 63.180(d)	§ 63.181(a) [G]§ 63.181(b) § 63.181(c) § 63.181(h) [G]§ 63.181(h)(1) [G]§ 63.181(h)(2) § 63.181(h)(4) [G]§ 63.181(h)(5) § 63.181(h)(6) § 63.181(h)(7) [G]§ 63.181(i)	[G]§ 63.182(a) [G]§ 63.182(b) § 63.182(c) [G]§ 63.182(c)(1) § 63.182(c)(4) [G]§ 63.182(d) § 63.2450(q)
2	B27P3FU1 B27P3FU2 B27P3FU3 GRP-FUG EMISS B93P6FU3	63FFFF-01	112(B) HAPS	[G]§ 63.164 [G]§ 63.180(b) [G]§ 63.180(c) [G]§ 63.180(d)	§ 63.181(a) [G]§ 63.181(b) § 63.181(c) [G]§ 63.181(d) [G]§ 63.181(f)	[G]§ 63.182(a) [G]§ 63.182(b) § 63.182(c) [G]§ 63.182(c)(1) § 63.182(c)(4) [G]§ 63.182(d) § 63.2450(q)

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Federal Operating Permit Program**

Table 1b: Additions

Date: November 2, 2023	Regulated Entity No.: RN100225945	Permit No.: 03905
Company Name: The Dow Chemical Company	Area Name: Polyethylene	

Revision No.	Unit/Group/Process ID No.	SOP/GOP Index No.	Pollutant	Monitoring and Testing Requirements	Recordkeeping Requirements	Reporting Requirements
2	B27P3FU1 B27P3FU2 B27P3FU3 GRP-FUG EMISS B93P6FU3	63FFFF-01	112(B) HAPS	[G]§ 63.163 [G]§ 63.176 [G]§ 63.180(b) [G]§ 63.180(d)	§ 63.181(a) [G]§ 63.181(b) § 63.181(c) [G]§ 63.181(d) § 63.181(h) [G]§ 63.181(h)(3) § 63.181(h)(4) [G]§ 63.181(h)(5) § 63.181(h)(6) § 63.181(h)(7) § 63.181(h)(8)	[G]§ 63.182(a) [G]§ 63.182(b) § 63.182(c) [G]§ 63.182(c)(1) § 63.182(c)(4) [G]§ 63.182(d) § 63.2450(q)
2	B27P3FU1 B27P3FU2 B27P3FU3 GRP-FUG EMISS B93P6FU3	63FFFF-01	112(B) HAPS	[G]§ 63.180(d) § 63.181(a)	§ 63.181(a) [G]§ 63.181(b) § 63.181(c) § 63.181(j)	[G]§ 63.182(a) [G]§ 63.182(b) § 63.2450(q)

**Applicable Requirements Summary
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Federal Operating Permit Program**

Table 1b: Additions

Date: November 2, 2023	Regulated Entity No.: RN100225945	Permit No.: 03905
Company Name: The Dow Chemical Company	Area Name: Polyethylene	

Revision No.	Unit/Group/Process ID No.	SOP/GOP Index No.	Pollutant	Monitoring and Testing Requirements	Recordkeeping Requirements	Reporting Requirements
2	B27P3FU1 B27P3FU2 B27P3FU3 GRP-FUG EMISS B93P6FU3	63FFFF-01	112(B) HAPS	[G]§ 63.169 [G]§ 63.180(b) [G]§ 63.180(d)	§ 63.181(a) [G]§ 63.181(b) § 63.181(c) [G]§ 63.181(d) [G]§ 63.181(i)	[G]§ 63.182(a) [G]§ 63.182(b) § 63.182(c) [G]§ 63.182(c)(1) § 63.182(c)(4) [G]§ 63.182(d) § 63.2450(q)
2	B27P3FU1 B27P3FU2 B27P3FU3 GRP-FUG EMISS B93P6FU3	63FFFF-01	112(B) HAPS	[G]§ 63.168 [G]§ 63.175 [G]§ 63.180(b) [G]§ 63.180(d)	§ 63.181(a) [G]§ 63.181(b) § 63.181(c) [G]§ 63.181(d) § 63.181(h) [G]§ 63.181(h)(1) [G]§ 63.181(h)(2) § 63.181(h)(4) [G]§ 63.181(h)(5) § 63.181(h)(6) § 63.181(h)(7)	[G]§ 63.182(a) [G]§ 63.182(b) § 63.182(c) [G]§ 63.182(c)(1) § 63.182(c)(4) [G]§ 63.182(d) § 63.2450(q)

**Applicable Requirements Summary
Form OP-REQ3 (Page 2)
Federal Operating Permit Program**

Table 1b: Additions

Date: November 2, 2023	Regulated Entity No.: RN100225945	Permit No.: 03905
Company Name: The Dow Chemical Company	Area Name: Polyethylene	

Revision No.	Unit/Group/Process ID No.	SOP/GOP Index No.	Pollutant	Monitoring and Testing Requirements	Recordkeeping Requirements	Reporting Requirements
2	B27P3FU1 B27P3FU2 B27P3FU3 GRP-FUG EMISS B93P6FU3	63FFFF-01	112(B) HAPS	[G]§ 63.174 [G]§ 63.180(b) [G]§ 63.180(d)	§ 63.181(a) [G]§ 63.181(b) § 63.181(c) [G]§ 63.181(d)	[G]§ 63.182(a) [G]§ 63.182(b) § 63.182(c) [G]§ 63.182(c)(1) § 63.182(c)(4) [G]§ 63.182(d) § 63.2450(q)
2	B27P3FU1 B27P3FU2 B27P3FU3 GRP-FUG EMISS B93P6FU3	63FFFF-01	112(B) HAPS	[G]§ 63.173 [G]§ 63.180(b) [G]§ 63.180(d)	§ 63.181(a) [G]§ 63.181(b) § 63.181(c) [G]§ 63.181(d)	[G]§ 63.182(a) [G]§ 63.182(b) § 63.182(c) [G]§ 63.182(c)(1) § 63.182(c)(4) [G]§ 63.182(d) § 63.2450(q)

**Applicable Requirements Summary
Form OP-REQ3 (Page 2)
Federal Operating Permit Program**

Table 1b: Additions

Date: November 2, 2023	Regulated Entity No.: RN100225945	Permit No.: 03905
Company Name: The Dow Chemical Company	Area Name: Polyethylene	

Revision No.	Unit/Group/Process ID No.	SOP/GOP Index No.	Pollutant	Monitoring and Testing Requirements	Recordkeeping Requirements	Reporting Requirements
2	B27P3FU1 B27P3FU2 B27P3FU3 GRP-FUG EMISS B93P6FU3	63FFFF-01	112(B) HAPS	[G]§ 63.169 [G]§ 63.180(b) [G]§ 63.180(d)	§ 63.181(a) [G]§ 63.181(b) § 63.181(c) [G]§ 63.181(d) [G]§ 63.181(i)	[G]§ 63.182(a) [G]§ 63.182(b) § 63.182(c) [G]§ 63.182(c)(1) § 63.182(c)(4) [G]§ 63.182(d) § 63.2450(q)
2	B27P3FU1 B27P3FU2 B27P3FU3 GRP-FUG EMISS B93P6FU3	63FFFF-01	112(B) HAPS	[G]§ 63.180(c) [G]§ 63.2480(e)(2) [G]§ 63.2480(e)(3)(i) [G]§ 63.2480(e)(3)(ii) § 63.2480(e)(3)(iii) § 63.2480(e)(3)(iv)	[G]§ 63.2480(e)(3)(i) [G]§ 63.2480(e)(3)(ii) § 63.2525(q)	§ 63.2450(q) § 63.2480(e)(3)(iii) § 63.2520(d)(4) § 63.2520(e)(14)

**Applicable Requirements Summary
Form OP-REQ3 (Page 2)
Federal Operating Permit Program**

Table 1b: Additions

Date: November 2, 2023	Regulated Entity No.: RN100225945	Permit No.: 03905
Company Name: The Dow Chemical Company	Area Name: Polyethylene	

Revision No.	Unit/Group/Process ID No.	SOP/GOP Index No.	Pollutant	Monitoring and Testing Requirements	Recordkeeping Requirements	Reporting Requirements
8	<i>B93P5PV51D</i>	<i>60DDD-01</i>	<i>VOC/TOC</i>	<i>[G]§ 60.564(d)</i>	<i>§ 60.565(a)</i> <i>§ 60.565(a)(10)</i> <i>§ 60.565(h)</i>	<i>§ 60.565(a)</i> <i>§ 60.565(a)(10)</i> <i>§ 60.565(k)</i> <i>§ 60.565(k)(6)</i> <i>§ 60.565(k)(7)</i>
8	<i>B93P6PV51D</i>	<i>60DDD-01</i>	<i>VOC/TOC</i>	<i>[G]§ 60.564(d)</i>	<i>§ 60.565(a)</i> <i>§ 60.565(a)(10)</i> <i>§ 60.565(h)</i>	<i>§ 60.565(a)</i> <i>§ 60.565(a)(10)</i> <i>§ 60.565(k)</i> <i>§ 60.565(k)(6)</i> <i>§ 60.565(k)(7)</i>

Texas Commission on Environmental Quality
Application Area-Wide Applicability Determinations and General Information
Form OP-REQ1
Federal Operating Permit Program

Date:	11/02/2023
Permit No.:	03905
RN No.:	RN100225945

For SOP applications, answer ALL questions unless otherwise directed.

◆ *For GOP applications, answer ONLY these questions unless otherwise directed.*

Form OP-REQ1: Page 3	
I. Title 30 TAC Chapter 111 - Control of Air Pollution from Visible Emissions and Particulate Matter (continued)	
C. Emissions Limits on Nonagricultural Processes (continued)	
4. The application area includes oil or gas fuel-fired steam generators subject to 30 TAC §§ 111.153(a) and 111.153(c).	<input type="checkbox"/> YES <input type="checkbox"/> NO
5. The application area includes oil or gas fuel-fired steam generators that are subject to additional monitoring requirements. <i>If the response to Question I.C.5 is "NO," go to Question I.C.7.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO
6. All oil or gas fuel-fired steam generators in the application area are subject to additional monitoring requirements.	<input type="checkbox"/> YES <input type="checkbox"/> NO
7. The application area includes solid fossil fuel-fired steam generators subject to 30 TAC §§ 111.153(a) and 111.153(b).	<input type="checkbox"/> YES <input type="checkbox"/> NO
8. The application area includes solid fossil fuel-fired steam generators that are subject to additional monitoring requirements. <i>If the response to Question I.C.8 is "NO," go to Section I.D.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO
9. All solid fossil fuel-fired steam generators in the application area are subject to additional monitoring requirements.	<input type="checkbox"/> YES <input type="checkbox"/> NO
D. Emissions Limits on Agricultural Processes	
1. The application area includes agricultural processes subject to 30 TAC § 111.171.	<input type="checkbox"/> YES <input type="checkbox"/> NO
E. Outdoor Burning	
◆ 1. Outdoor burning is conducted in the application area. <i>If the response to Question I.E.1 is "NO," go to Section II.</i>	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO
◆ 2. Fire training is conducted in the application area and subject to the exception provided in 30 TAC § 111.205.	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO
◆ 3. Fires for recreation, ceremony, cooking, and warmth are used in the application area and subject to the exception provided in 30 TAC § 111.207.	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO
◆ 4. Disposal fires are used in the application area and subject to the exception provided in 30 TAC § 111.209.	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO

Texas Commission on Environmental Quality
Application Area-Wide Applicability Determinations and General Information
Form OP-REQ1
Federal Operating Permit Program

Date:	11/02/2023
Permit No.:	03905
RN No.:	RN100225945

For SOP applications, answer ALL questions unless otherwise directed.

◆ *For GOP applications, answer ONLY these questions unless otherwise directed.*

Form OP-REQ1: Page 4	
I. Title 30 TAC Chapter 111 - Control of Air Pollution from Visible Emissions and Particulate Matter (continued)	
E. Outdoor Burning (continued)	
◆	5. Prescribed burning is used in the application area and subject to the exception provided in 30 TAC § 111.211. <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
◆	6. Hydrocarbon burning is used in the application area and subject to the exception provided in 30 TAC § 111.213. <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
◆	7. The application area has received the TCEQ Executive Director approval of otherwise prohibited outdoor burning according to 30 TAC § 111.215. <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
II. Title 30 TAC Chapter 112 - Control of Air Pollution from Sulfur Compounds	
A. Temporary Fuel Shortage Plan Requirements	
	1. The application area includes units that are potentially subject to the temporary fuel shortage plan requirements of 30 TAC §§ 112.15 - 112.18. <input type="checkbox"/> YES <input type="checkbox"/> NO
III. Title 30 TAC Chapter 115 - Control of Air Pollution from Volatile Organic Compounds	
A. Applicability	
◆	1. The application area is located in the Houston/Galveston/Brazoria area, Beaumont/Port Arthur area, Dallas/Fort Worth area, El Paso area, or a covered attainment county as defined by 30 TAC § 115.10. <i>See instructions for inclusive counties. If the response to Question III.A.1 is "NO," go to Section IV.</i> <input type="checkbox"/> YES <input type="checkbox"/> NO
B. Storage of Volatile Organic Compounds	
◆	1. The application area includes storage tanks, reservoirs, or other containers capable of maintaining working pressure sufficient at all times to prevent any VOC vapor or gas loss to the atmosphere. <input type="checkbox"/> YES <input type="checkbox"/> NO

Permit By Rule Supplemental Table (Page 2)
Table B: Claimed (not registered) Permits by Rule (30 TAC Chapter 106) for the Application Area
Texas Commission on Environmental Quality

Date	Permit Number	Regulated Entity Number
11/02/2023	03905	RN100225945

Unit ID No.	PBR No.	Version No./Date
B27P3BT2600	106.472	09/04/2000

Permit By Rule Supplemental Table (Page 3)
Table C: Claimed (not registered) Permits by Rule (30 TAC Chapter 106) for Insignificant Sources for the Application Area
Texas Commission on Environmental Quality

Date	Permit Number	Regulated Entity Number
11/02/2023	03905	RN100225945

PBR No.	Version No./Date
106.472	09/04/2000

Permit By Rule Supplemental Table (Page 4)
Table D: Monitoring Requirements for registered and claimed PBRs for the Application Area
Texas Commission on Environmental Quality

Date	Permit Number	Regulated Entity Number
11/02/2023	03905	RN100225945

Unit ID No.	PBR No.	Version No./Date Or Registration No.	Monitoring Requirement
B27P3BT2600	106.472	09/04/2000	Material safety data sheet. This tank does not store volatile organic compound (VOC).