

**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.

<b>I. Identifying Information</b>
RN: <b>RN100225945</b>
CN: <b>CN600356976</b>
Account No.: <b>BL-0082-R</b>
Permit No.: <b>O2697</b>
Project No.: <b>36949</b>
Area Name: <b>Freeport Energy Center</b>
Company Name: <b>The Dow Chemical Company</b>
<b>II. Certification Type</b> <i>(Please mark appropriate box)</i>
<input type="checkbox"/> Responsible Official Representative <input checked="" type="checkbox"/> <b>Duly Authorized Representative</b>
<b>III. Submittal Type</b> <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 type="checkbox"/> Update to Permit Application
<input checked="" type="checkbox"/> <b>Other: <u>Working Draft Permit (WDP) Certification</u></b>

**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.

<b>IV. Certification of Truth</b>
<b>This certification does not extend to information which is designated by TCEQ as information for reference only.</b>
I, <u>Fran Quinlan Falcon</u> certify that I am the <u>DAR</u> <div style="display: flex; justify-content: space-between; margin-top: 5px;"><span><i>(Certifier Name printed or typed)</i></span><span><i>(RO or DAR)</i></span></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>February 21, 2024</u> to <u>March 24, 2025</u> <div style="display: flex; justify-content: space-between; margin-top: 5px;"><span><i>(Start Date)</i></span><span><i>(End Date)</i></span></div>
Specific Dates: _____ <div style="display: flex; justify-content: space-between; margin-top: 5px;"><span><i>(Date 1)</i></span><span><i>(Date 2)</i></span><span><i>(Date 3)</i></span><span><i>(Date 4)</i></span></div>
_____ <div style="display: flex; justify-content: space-between; margin-top: 5px;"><span><i>(Date 5)</i></span><span><i>(Date 6)</i></span></div>
Signature: _____ Signature Date: <u>March 24, 2025</u> Title: _____
Title: <u>Texas Regional Environmental Leader</u>

## Texas Commission on Environmental Quality

Title V Existing

2697

### Site Information (Regulated Entity)

What is the name of the permit area to be authorized?	FREEPORT ENERGY CENTER
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) (##.#####)	28.990833
Longitude (W) (-###.#####)	95.4075
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 (###-###-####)	9792389977
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

2301 N BRAZOSPORT BLVD  
BLDG B-101  
FREEPORT  
TX  
77541  
9792389764  
  
9792380317  
FQFalcon@dow.com

## Technical Contact

Person TCEQ should contact for questions about this application:

Select existing TC contact or enter a new contact.

CRYSTAL SCHMIDT(THE DOW CHEMICA... )

Organization Name

THE DOW CHEMICAL COMPANY

Prefix

MRS

First

CRYSTAL

Middle

Last

SCHMIDT

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)

332 HIGHWAY 332 E

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

City

LAKE JACKSON

State

TX

ZIP

77566

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

9792381742

Extension

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

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

E-mail

cschmidt6@dow.com

## Title V General Information - Existing

1) Permit Type:

SOP

2) Permit Latitude Coordinate:

28 Deg 59 Min 27 Sec

3) Permit Longitude Coordinate:

95 Deg 24 Min 27 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.

2697-36949

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

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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

<a href=/ePermitsExternal/faces/file?fileId=247009>O2697\_Form\_OP-CRO1.pdf</a>

Hash

404EE97630F26973D2A9EC6B242459CBCAD841CCDBEA8EBF76407E5351657F33

MIME-Type

application/pdf

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

## Certification

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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 2697.
- 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:	170.85.99.3
Signature Date:	2025-03-24
Signature Hash:	47028DDAF3697FA5C70F77C16A06E50F53CC1EEEEAEF487D89AB53CE34D67B713
Form Hash Code at time of Signature:	C9604146FEF6A7492A4EE7EC91E11CFE4279907200DF91CA405C264DDBDD536A

Submission

Reference Number:	The application reference number is 772184
Submitted by:	The application was submitted by ER028176/Fran Q Falcon
Submitted Timestamp:	The application was submitted on 2025-03-24 at 13:18:41 CDT
Submitted From:	The application was submitted from IP address 170.85.99.3
Confirmation Number:	The confirmation number is 641088
Steers Version:	The STEERS version is 6.89
Permit Number:	The permit number is 2697

Additional Information

Application Creator: This account was created by Crystal Schmidt

**From:** John Walker  
**Sent:** Tuesday, March 18, 2025 5:04 PM  
**To:** Schmidt, Crystal (C)  
**Subject:** RE: Working Draft Permit - FOP O2697/Project 36949 The Dow Chemical Company/Dow Texas Operations - Freeport

Good Afternoon,

I have reviewed the documents and made the appropriate updates to the permit. The following changes were made:

1. Updated Permit Term 13 to reference the March 6, 2025 submittal of Form OP-PBRSUP.
2. Removed PBR 106.464/07/08/1998 from the New Source Review Authorization References Table.

I am moving the project forward to QA/QC review for issuance of the public announcement. Please submit the following requested information as soon as possible but no later than **03/25/2025**:

1. Please submit Form OP-CRO1 in an application update in STEERS to certify application updates and the Working Draft Permit approval. A specific date of **03/06/2025** should be used and the Submittal Type should be marked: **Update to Permit Application**.

Please submit the Form OP-CRO1 in STEERS. I have limited access to my mailbox due to construction occurring at my office. If you have any questions about submitting an application update in STEERS, please contact me.

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.

**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](mailto: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](#).**

Please review the "SOP Technical Review Fact Sheet" located at [https://link.edgepilot.com/s/e9ba3918/ZDg\\_Ues11kqpJYtwoNSwyg?u=http://www.tceq.texas.gov/assets/public/permitting/air/Guidance/Title\\_V/sop\\_wdp\\_factsheet.pdf](https://link.edgepilot.com/s/e9ba3918/ZDg_Ues11kqpJYtwoNSwyg?u=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,



**John Walker**

Permit Reviewer

OA/Air Permits Division/OP Section

Texas Commission on Environmental Quality

MC-163, P.O. Box 13087

Austin, TX 78711-3087

[John.Walker@tceq.texas.gov](mailto:John.Walker@tceq.texas.gov)

Phone: (512) 239-1277



How are we doing? Fill out our online customer satisfaction survey at [www.tceq.texas.gov/customersurvey](http://www.tceq.texas.gov/customersurvey)

**From:** Schmidt, Crystal (C) <cschmidt6@dow.com>  
**Sent:** Thursday, March 6, 2025 12:38 PM  
**To:** John Walker  
**Subject:** RE: Working Draft Permit - FOP O2697/Project 36949 The Dow Chemical Company/Dow Texas Operations - Freeport  
**Attachments:** 2025-03-06\_WDP\_Response\_O2697.pdf; 20250221 - WDP\_FOP O2697\_Project 36949\_Dow.docx

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

**Categories:** Red Category

John,

Please see our attached response and let me know if you have any questions. Thanks and have a great weekend!

*Crystal Schmidt*

Crystal Schmidt  
Air Permit Manager  
The Dow Chemical Company  
332 SH 332 E  
cell phone: 409.392.5054  
phone: 979.238.1742 | email: [cschmidt6@dow.com](mailto:cschmidt6@dow.com)



General Business



March 6, 2025

**E-MAIL RESPONSE**

Texas Commission on Environmental Quality  
ATTN: Mr. John Walker  
Air Permits Division, MC-163  
P.O. Box 13087  
Austin, TX 78711-3087

**The Dow Chemical Company, CN600356976**  
**Environmental Operations, RN100225945**  
**Title V Operating Permit WDP Response for Freeport Energy Center, O2697**  
**TCEQ Project Number: 36949**

Dear Mr. Walker,

The Dow Chemical Company (Dow) is providing a response to the Notice of Deficiency (NOD) items and providing comments on the Working Draft Permit provided on February 21, 2025.

Please do not hesitate to contact me at (979) 238-1742 or [cschmidt6@dow.com](mailto:cschmidt6@dow.com) if you require additional information regarding this submittal.

Sincerely,

*Crystal Schmidt*

Crystal Schmidt  
Air Permit Manager

enclosure

cc:

US EPA Region 6  
TCEQ Air Section Manager, Region 12  
Brazoria County Health Department

R6AirPermitsTX@epa.gov  
R12apdmail@tceq.texas.gov  
jodie@brazoria-county.com

### Additional Information Request

<b>Item 1</b>	<p>I have attached a new Major NSR Summary Table for NSR 46306, PSDTX986, and NO59 in Appendix B for the updated 10/13/2023 issuance that is being incorporated into the permit. It is based off the MAERT from the 08/31/2023 issuance of NSR 46306, PSDTX986, and NO59.</p> <p>The Major NSR Summary Table contains the MAERT information in the four main columns on the left-hand side of the table, along with 3 additional columns for monitoring/testing, recordkeeping, and reporting (MRRT) on the right-hand side. The Major NSR Summary Table – Applicant’s Instructions can be found under Technical Forms at: <a href="http://www.tceq.texas.gov/permitting/air/titlev/site/site_experts.html">http://www.tceq.texas.gov/permitting/air/titlev/site/site_experts.html</a>.</p>
<b>Item 1 Response</b>	<b>Please see the attached Major NSR Summary Table for more information (attached as a separate document).</b>
<b>Item 2</b>	I cannot not add units with the applicable form “OP-SUMR” to the Title V permit since there are no applicable requirements to be documented in the Title V permit. If the only applicability that can be documented is non-applicability on Form OP-REQ2, please provide the units on Form OP-SUMR and OP-REQ2 in the next renewal. You should leave them on Form OP-PBRSUP since they are authorized by PBRs.
<b>Item 2 Response</b>	<b>Dow agrees with this assessment and will provide the units on the OP-REQ2 during the next renewal.</b>
<b>Item 3</b>	<p>Please address the following Form OP-PBRSUP deficiencies:</p> <ul style="list-style-type: none"> <li>a. Unit ID B58PWSC802 has 106.454/11/01/2001 as a preconstruction authorization in the WDP but 106.454/07/08/1998 on Form OP-PBRSUP.</li> <li>b. Several units in the WDP are documented with PBRs as preconstruction authorizations but are not documented on Form OP-PBRSUP (Unit IDs: B664PSP4A, B664PSP4B, BM54SILR3, BM54SIST30). These units should be documented on either Table A or B and Table D of Form OP-PBRSUP.</li> </ul>
<b>Item 3 Response</b>	<b>Please see the attached Form OP-REQ1 (Page 89 only) and OP-PBRSUP for more information.</b>

## **Working Draft Permit Comments**

Dow has no comments on this Working Draft Permit (WDP).

**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
March 6, 2025	O2697	RN100225945

Unit ID No.	Registration No.	PBR No.	Registration Date
A25SIFU01 B4SIFU01 BM54SIFU01	154810	106.261 106.262	02/21/2019
B4ADFU01	50646	106.477	04/24/2002
B4ADFU01	153945	106.477	10/11/2018

**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
March 6, 2025	O2697	RN100225945

Unit ID No.	PBR No.	Version No./Date
B56P9CWS1	106.371	09/04/2000
B56SEP001	106.532	09/04/2000
B58PWSC802	106.454	<del>11/01/2001</del> 07/08/1998
PROPWRA PROPWRB PROPWRC	106.263	11/01/2001
A25SILRT25 B4SILRD500 BM54SILR30	106.473	09/04/2000
A25SISTT25 B4SISTD500 BM54SIST30	106.478	09/04/2000
B56P9TK1	106.474	09/04/2000
B73ESSTHCL	106.532	09/04/2000
<b>B664PSP4A</b> <b>B664PSP4B</b>	<b>106.478</b>	<b>09/04/2000</b>

**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
March 6, 2025	O2697	RN100225945

PBR No.	Version No./Date
N/A	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
March 6, 2025	O2697	RN100225945

Unit ID No.	PBR No.	Version No./Date Or Registration No.	Monitoring Requirement
A25SIFU01 B4SIFU01 BM54SIFU01	106.261 106.262	154810	New piping components are managed in accordance with the current Leak Detection and Repair (LDAR) fugitive monitoring program.
B4ADFU01	106.477	50646	New piping components are managed in accordance with the current Leak Detection and Repair (LDAR) fugitive monitoring program.
B4ADFU01	106.477	153945	New piping components are managed in accordance with the current Leak Detection and Repair (LDAR) fugitive monitoring program.
B56P9CWS1	106.371	09/04/2000	One-time verification by P&ID review indicates cooling system once through water will not be in direct contact with gaseous/liquid process streams containing carbon compounds.
B56SEP001	106.532	09/04/2000	Confirmation facility performs indicated function.
B58PWSC802	106.454	<del>11/01/2001</del> <del>07/08/1998</del>	Inspect equipment and record data monthly to ensure compliance with any applicable requirements in 115.412(1)(A)-(F).
PROPWRA PROPWRB PROPWRC	106.263	11/01/2001	Track emissions on a rolling 12-month basis.
A25SILRT25 B4SILRD500 BM54SILR30	106.473	09/04/2000	Maintain records of annual throughput.
A25SISTT25 B4SISTD500 BM54SIST30	106.478	09/04/2000	Maintain records of tank service and annual throughput.

**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
March 6, 2025	O2697	RN100225945

Unit ID No.	PBR No.	Version No./Date Or Registration No.	Monitoring Requirement
B56P9TK1	106.474	09/04/2000	Maintain records of tank service and annual throughput.
B73ESSTHCL	106.532	09/04/2000	Confirmation facility performs indicated function.
<i>B664PSP4A</i> <i>B664PSP4B</i>	<i>106.478</i>	<i>09/04/2000</i>	<i>Maintain records of the vapor pressures of all materials stored, processed, or handled to ensure the vapor pressure is less than 0.5 psia to demonstrate compliance with 115.137(a)(2).</i>

**Application Area-Wide Applicability Determinations and General Information**  
**Form OP-REQ1 (Page 89)**  
**Federal Operating Permit Program**  
**Texas Commission on Environmental Quality**

Date	Permit No.	Regulated Entity No.
March 6, 2025	O2697	RN100225945

For SOP applications, answer ALL questions unless otherwise directed.

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

**XII. NSR Authorizations (continued) - (Attach additional sheets if necessary for sections XII.E-J.)**

◆ **H. Title 30 TAC Chapter 116 Permits, Special Permits, Standard Permits, Other Authorizations (Other Than Permits By Rule, PSD Permits, NA Permits) for the Application Area**

Authorization No.	Issuance Date	Authorization No.	Issuance Date	Authorization No.	Issuance Date

◆ **I. Permits by Rule (30 TAC Chapter 106) for the Application Area**

*A list of selected Permits by Rule (previously referred to as standard exemptions) that are required to be listed in the FOP application is available in the instructions.*

PBR No.	Version No./Date	PBR No.	Version No./Date	PBR No.	Version No./Date
106.261	11/01/2003	106.474	09/04/2000		
106.262	11/01/2003	106.477	09/04/2000		
106.263	11/01/2001	106.478	09/04/2000		
106.371	09/04/2000	106.532	09/04/2000		
<del>106.454</del>	<del>07/08/1998</del>				
106.454	11/01/2001				
106.473	09/04/2000				

◆ **J. Municipal Solid Waste and Industrial Hazardous Waste Permits with an Air Addendum**

Permit No.	Issuance Date	Permit No.	Issuance Date	Permit No.	Issuance Date

**From:** John Walker  
**Sent:** Friday, February 21, 2025 5:16 PM  
**To:** Schmidt, Crystal (C)  
**Subject:** Working Draft Permit - FOP O2697/Project 36949 The Dow Chemical Company/Dow Texas Operations - Freeport

Good Afternoon,

I have conducted a technical review of the minor revision application for The Dow Chemical Company, Dow Texas Operations - Freeport. 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.

Please review the WDP and submit to me any comments you have on the working draft permit by **03/07/2025**. Please submit a written response by this deadline, even if you are not making any comments on the content of the WDP. In addition, please provide the following requested information:

1. I have attached a new Major NSR Summary Table for NSR 46306, PSDTX986, and NO59 in Appendix B for the updated 10/13/2023 issuance that is being incorporated into the permit. It is based off the MAERT from the 08/31/2023 issuance of NSR 46306, PSDTX986, and NO59.

The Major NSR Summary Table contains the MAERT information in the four main columns on the left-hand side of the table, along with 3 additional columns for monitoring/testing, recordkeeping, and reporting (MRRT) on the right-hand side. The Major NSR Summary Table – Applicant’s Instructions can be found under Technical Forms at: [http://www.tceq.texas.gov/permitting/air/titlev/site/site\\_experts.html](http://www.tceq.texas.gov/permitting/air/titlev/site/site_experts.html).

2. I cannot not add units with the applicable form “OP-SUMR” to the Title V permit since there are no applicable requirements to be documented in the Title V permit. If the only applicability that can be documented is non-applicability on Form OP-REQ2, please provide the units on Form OP-SUMR and OP-REQ2 in the next renewal. You should leave them on Form OP-PBR SUP since they are authorized by PBRs.
3. Please address the following Form OP-PBR SUP deficiencies:
  - a. Unit ID B58PWSC802 has 106.454/11/01/2001 as a preconstruction authorization in the WDP but 106.454/07/08/1998 on Form OP-PBR SUP.
  - b. Several units in the WDP are documented with PBRs as preconstruction authorizations but are not documented on Form OP-PBR SUP (Unit IDs: B664PSP4A, B664PSP4B, BM54SILR3, BM54SIST30).

These units should be documented on either Table A or B and Table D of Form OP-PBR SUP.

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](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](mailto: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,

**John Walker**

Permit Reviewer

OA/Air Permits Division/OP Section

Texas Commission on Environmental Quality

MC-163, P.O. Box 13087

Austin, TX 78711-3087

[John.Walker@tceq.texas.gov](mailto:John.Walker@tceq.texas.gov)

Phone: (512) 239-1277



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**From:** John Walker

**Sent:** Friday, September 27, 2024 4:33 PM

**To:** Schmidt, Crystal (C) <cschmidt6@dow.com>

**Subject:** Technical Review - FOP 02697/Project 36949 The Dow Chemical Company/Dow Texas Operations - Freeport

Good Afternoon,

I have been assigned to the Federal Operating Permit (FOP) revision application of Permit No. 02697 The Dow Chemical Company, Dow Texas Operations - Freeport. This application has been assigned Project No. 36949. Please address all correspondence pertaining to this permit application, including any updates, to me at the address below, and use both the Permit and Project reference numbers above to facilitate tracking.

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.

**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](mailto: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](#).**

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](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,

**John Walker**

Permit Reviewer  
OA/Air Permits Division/OP Section  
Texas Commission on Environmental Quality  
MC-163, P.O. Box 13087  
Austin, TX 78711-3087  
[John.Walker@tceq.texas.gov](mailto:John.Walker@tceq.texas.gov)

Phone: (512) 239-1277



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July 31, 2024

*Electronic Submittal via ePermits*

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

**The Dow Chemical Company, CN600356976**  
**Dow Texas Operations, RN100225945**  
**Freeport Energy Center – Title V Operating Permit O2697**  
**Permit Minor Revision Application**

Dear Mr. Bowers,

The Dow Chemical Company is submitting the Title V Operating Permit O2697 Minor Revision Application for the Freeport Energy Center facility located in Brazoria County, Texas in accordance with 30 TAC Chapter 122, Subchapter, C §122.215, §122.216, and §122.217. Dow is also requesting to update the Technical Contact for this permit. Please see the attached Form OP-1 for more information.

For future correspondence regarding this minor revision application, I can be contacted at (979) 238-1742 or [cschmidt6@dow.com](mailto:cschmidt6@dow.com).

Sincerely,

*Crystal Schmidt*

Crystal Schmidt  
Air Permit Manager

enclosure

cc:

US EPA Region 6  
TCEQ Air Section Manager, Region 12  
Brazoria County Environmental Health Director

R6AirPermitsTX@epa.gov  
R12apdmail@tceq.texas.gov  
jodie@brazoria-county.com



**Federal Operating Permit Program**  
**Form OP-1 – Site Information Summary (Page 1)**

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.

<b>I. Company Identifying Information</b>
A. Company Name: <b>The Dow Chemical Company</b>
B. Customer Reference Number (CN): <b>CN600356976</b>
C. Submittal Date (mm/dd/yyyy): <b>July 31, 2024</b>
<b>II. Site Information</b>
A. Site Name: <b>Dow Texas Operations - Freeport</b>
B. Regulated Entity Reference Number (RN): <b>RN100225945</b>
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 <sub>x</sub> <input checked="" type="checkbox"/> SO <sub>2</sub> <input checked="" type="checkbox"/> PM <sub>10</sub> <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? <span style="float: right;"><input type="checkbox"/> YES <input checked="" type="checkbox"/> NO</span>
F. Is the site within a local program area jurisdiction? <span style="float: right;"><input checked="" type="checkbox"/> YES <input type="checkbox"/> NO</span>
G. Will emissions averaging be used to comply with any Subpart of 40 CFR Part 63? <span style="float: right;"><input type="checkbox"/> YES <input checked="" type="checkbox"/> NO</span>
H. Indicate the 40 CFR Part 63 Subpart(s) that will use emissions averaging: <b>N/A</b>
<b>III. Permit Type</b>
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**  
**Form OP-1 – Site Information Summary (Page 2)**

<b>IV. Initial Application Information</b> <i>(Complete for Initial Issuance Applications Only.)</i>
<b>A.</b> Is this submittal an abbreviated or a full application? <span style="float: right;"><input type="checkbox"/> Abbreviated <input type="checkbox"/> Full</span>
<b>B.</b> If this is a full application, is the submittal a follow-up to an abbreviated application? <span style="float: right;"><input type="checkbox"/> YES <input type="checkbox"/> NO</span>
<b>C.</b> If this is an abbreviated application, is this an early submittal for a combined SOP and Acid Rain permit? <span style="float: right;"><input type="checkbox"/> YES <input type="checkbox"/> NO</span>
<b>D.</b> Has an electronic copy of this application been submitted (or is being submitted) to EPA? (Refer to the form instructions for additional information.) <span style="float: right;"><input type="checkbox"/> YES <input type="checkbox"/> NO</span>
<b>V. Confidential Information</b>
<b>A.</b> Is confidential information submitted in conjunction with this application? <span style="float: right;"><input type="checkbox"/> YES <input checked="" type="checkbox"/> NO</span>
<b>VI. Responsible Official (RO) Identifying Information</b>
RO Name Prefix: ( <input type="checkbox"/> Mr. <input type="checkbox"/> Mrs. <input checked="" type="checkbox"/> Ms. <input type="checkbox"/> Dr.)
RO Full Name: <b>John Sampson</b>
RO Title: <b>Senior Vice President</b>
Employer Name: <b>The Dow Chemical Company</b>
Mailing Address: <b>2301 North Brazosport Blvd.</b>
City: <b>Freeport</b>
State: <b>TX</b>
ZIP Code: <b>77541</b>
Territory:
Country: <b>USA</b>
Foreign Postal Code:
Internal Mail Code:
Telephone No.: <b>979-238-9977</b>
Fax No.: <b>979-235-8116</b>
Email: <b>TXLES@dow.com</b>

**Federal Operating Permit Program  
Form OP-1 – Site Information Summary (Page 3)**

<b>VII. Technical Contact Identifying Information</b> <i>(Complete if different from RO.)</i>
Technical Contact Name Prefix: ( <input type="checkbox"/> Mr. <input checked="" type="checkbox"/> Mrs. <input type="checkbox"/> Ms. <input type="checkbox"/> Dr.)
Technical Contact Full Name: <b>Crystal Schmidt</b>
Technical Contact Title: <b>Air Permit Manager</b>
Employer Name: <b>The Dow Chemical Company</b>
Mailing Address: <b>332 South Hwy 332 E</b>
City: <b>Lake Jackson</b>
State: <b>Texas</b>
ZIP Code: <b>77566</b>
Territory:
Country: <b>USA</b>
Foreign Postal Code:
Internal Mail Code:
Telephone No.: <b>979-238-1742</b>
Fax No.:
Email: <b>cschmidt6@dow.com</b>
<b>VIII. Reference Only Requirements</b> <i>(For reference only.)</i>
<b>A.</b> State Senator: <b>Joan Huffman</b>
<b>B.</b> State Representative: <b>Cody Vasut</b>
<b>C.</b> Has the applicant paid emissions fees for the most recent agency fiscal year (Sept. 1 - August 31)? <span style="float: right;"><input checked="" type="checkbox"/> YES <input type="checkbox"/> NO <input type="checkbox"/> N/A</span>
<b>D.</b> Is the site subject to bilingual notice requirements pursuant to 30 TAC § 122.322? <span style="float: right;"><input checked="" type="checkbox"/> YES <input type="checkbox"/> NO</span>
<b>E.</b> Indicate the alternate language(s) in which public notice is required: <b>Spanish</b>

**Federal Operating Permit Program**  
**Form OP-1 – Site Information Summary (Page 4)**

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

**Federal Operating Permit Program  
Form OP-1 – Site Information Summary (Page 5)**

<b>X. Application Area Information (<i>continued</i>)</b>
<b>G.</b> Latitude (nearest second): <b>28° 59' 27"</b>
<b>H.</b> Longitude (nearest second): <b>95° 24' 27"</b>
<b>I.</b> Are there any emission units that were not in compliance with the applicable requirements identified in the application at the time of application submittal? <span style="float: right;"><input type="checkbox"/> YES <input checked="" type="checkbox"/> NO</span>
<b>J.</b> Indicate the estimated number of emission units in the application area: <b>32</b>
<b>K.</b> Are there any emission units in the application area subject to the Acid Rain Program? <span style="float: right;"><input type="checkbox"/> YES <input checked="" type="checkbox"/> NO</span>
<b>XI. Public Notice</b> (Complete this section for SOP Applications and Acid Rain Permit Applications only.)
<b>A.</b> Name of a public place to view application and draft permit: <b>Freeport Library</b>
<b>B.</b> Physical Address: <b>410 Brazosport Blvd</b>
City: <b>Freeport</b>
ZIP Code: <b>77541</b>
<b>C.</b> Contact Person (Someone who will answer questions from the public during the public notice period):
Contact Name Prefix: ( <input type="checkbox"/> Mr. <input checked="" type="checkbox"/> Mrs. <input type="checkbox"/> Ms. <input type="checkbox"/> Dr.):
Contact Person Full Name: <b>Crystal Schmidt</b>
Contact Mailing Address: <b>332 South Hwy 332 E</b>
City: <b>Lake Jackson</b>
State: <b>Texas</b>
ZIP Code: <b>77566</b>
Territory:
Country: <b>USA</b>
Foreign Postal Code:
Internal Mail Code:
Telephone No.: <b>979-238-1742</b>

**Federal Operating Permit Program  
Form OP-1 – Site Information Summary (Page 6)**

**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: (☐ Mr. ☐ Mrs. ☐ Ms. ☐ 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  
Form OP-1 – Site Information Summary (Page 7)**

**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:

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

<b>Date:</b>	July 31, 2024					
<b>Permit No.:</b>	O2697					
<b>Regulated Entity No.:</b>	RN100225945					
<b>Company Name:</b>	The Dow Chemical Company					
<b>I. Description of Revision</b>						
Revision No.	Revision Code	Unit/Group Process			NSR Authorization	Description of change and Provisional Terms and Conditions
		New Unit	ID No.	Applicable Form		
1	MS-C	YES	A25SILRT25 B4SILRD500 BM54SILR30	OP-SUMR OP-UA4	N/A	<p>Please add these transfer racks to this Title V Permit. These units are being transferred from another existing Dow Title V Permit, O2213. An application update to the Minor Revision project (Project # 35544) for Title V Permit O2213 is being submitted concurrently with this Minor Revision application.</p> <p>Please add 30 TAC Chapter 115, Loading and Unloading of VOC positive applicability to these transfer racks.</p>
2	MS-C	YES	A25SISTT25 B4SISTD500 BM54SIST30	OP-SUMR	N/A	<p>Please add these storage tanks to this Title V Permit. These units are being transferred from another existing Dow Title V Permit, O2213. An application update to the Minor Revision project (Project # 35544) for Title V Permit O2213 is being submitted concurrently with this Minor Revision application.</p> <p>Please add 30 TAC Chapter 115, Storage of VOC positive applicability to these storage tanks.</p>



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

<b>Date:</b>	July 31, 2024					
<b>Permit No.:</b>	O2697					
<b>Regulated Entity No.:</b>	RN100225945					
<b>Company Name:</b>	The Dow Chemical Company					
<b>I. Description of Revision</b>						
Revision No.	Revision Code	Unit/Group Process			NSR Authorization	Description of change and Provisional Terms and Conditions
		New Unit	ID No.	Applicable Form		
3	MS-C	YES	A25SIFU01 B4SIFU01 BM54SIFU01	OP-SUMR OP-PBR SUP	N/A	<p>Please add these fugitive IDs to this Title V Permit. These units are being transferred from another existing Dow Title V Permit, O2213. An application update to the Minor Revision project (Project # 35544) for Title V Permit O2213 is being submitted concurrently with this Minor Revision application.</p> <p>These units have no positive applicability to be added at this time; therefore, they are being included for completeness purposes only. The following permit shields will be requested to be added during the next renewal process: 30 TAC Chapter 115, Pet. Refinery &amp; Petrochemicals and 40 CFR Part 61, Subpart F.</p>
4	MS-C	YES	B4ADFU01	OP-SUMR OP-PBR SUP	N/A	<p>Please add this fugitive ID to this Title V Permit. This unit is being transferred from another existing Dow Title V Permit, O2213. An application update to the Minor Revision project (Project # 35544) for Title V Permit O2213 is being submitted concurrently with this Minor Revision application.</p> <p>This unit has no positive or negative applicability to be added; therefore, they are being included for completeness purposes only.</p>

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

<b>Date:</b>	July 31, 2024					
<b>Permit No.:</b>	O2697					
<b>Regulated Entity No.:</b>	RN100225945					
<b>Company Name:</b>	The Dow Chemical Company					
<b>I. Description of Revision</b>						
Revision No.	Revision Code	Unit/Group Process			NSR Authorization	Description of change and Provisional Terms and Conditions
		New Unit	ID No.			
5	MS-C	NO	B56P9GT96		OP-UA11 OP-REQ3	N/A
						Please update the 40 CFR Part 63, Subpart YYYY attributes on Form OP-UA11/Table 5, as well as the citations for the unit. The citations will now include standards that did not apply until the Stay was lifted on March 9, 2022 [63.6105(a) and 63.6105(c)].  Please see Form OP-REQ3 for more information. Additions have been bolded and italicized and deletions have been marked with a strikethrough.
6	MS-C	NO	A25SILRT25 A25SISTT25 A25SIFU01 B4ADFU01 B4SILRD500	B4SISTD500 B4SIFU01 BM54SILR30 BM54SIST30 BM54SIFU01 B73ESSTHCL	OP-SUMR OP-PBR SUP	N/A
						Please update the PBR Supplemental Table to include any changes that have been made since the permit was last renewed in July 2022 (Project #33194).  Please update the authorizations for these units on the Form OP-SUMR to match the PBR Supplemental Table.

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

<b>Date:</b>	July 31, 2024					
<b>Permit No.:</b>	O2697					
<b>Regulated Entity No.:</b>	RN100225945					
<b>Company Name:</b>	The Dow Chemical Company					
<b>I. Description of Revision</b>						
Revision No.	Revision Code	Unit/Group Process			NSR Authorization	Description of change and Provisional Terms and Conditions
		New Unit	ID No.	Applicable Form		
7	MS-C	NO	B56P9TK1 B73ESSTHCL	OP-SUMR OP-PBRUP	N/A	<p>Please add these storage tanks to this Title V Permit.</p> <p>These units have no positive applicability to be added at this time; therefore, they are being included for completeness purposes only. The following permit shields will be requested to be added during the next renewal process: 30 TAC Chapter 115, Storage of VOCs; 40 CFR Part 60, Subpart Kb; and 40 CFR Part 61, Subpart FF.</p>

**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.
July 31, 2024	O2697	RN100225945

Unit/Process						Preconstruction Authorizations	
AI	Revision No.	ID No.	Applicable Form	Name/ Description	CAM	30 TAC Chapter 116/ 30 TAC Chapter 106	Title I
A	3, 6	<i>A25SIFU01</i>	<i>OP-SUMR</i>	<i>A-2500 DISTILLATE TANK FUGITIVES</i>		<i>106.261/11/01/2003 [154810] 106.262/11/01/2003 [154810]</i>	
A	1, 6	<i>A25SILRT25</i>	<i>OP-UA4</i>	<i>A-25 – DISTILLATE LOADING</i>		<i>106.473/09/04/2000</i>	
A	2, 6	<i>A25SISTT25</i>	<i>OP-UA3</i>	<i>A-2500 DISTILLATE TANK-25</i>		<i>106.478/09/04/2000</i>	
A	3, 6	<i>B4ADFU01</i>	<i>OP-SUMR</i>	<i>AMMONIA DISTRIBUTION FUGITIVES</i>		<i>106.477/09/04/2000 [50646, 153945]</i>	
A	3, 6	<i>B4SIFU01</i>	<i>OP-SUMR</i>	<i>B-400 DISTILLATE TANK FUGITIVES</i>		<i>106.261/11/01/2003 [154810] 106.262/11/01/2003 [154810]</i>	
A	1, 6	<i>B4SILRD500</i>	<i>OP-UA4</i>	<i>B-400 DISTILLATE LOADING</i>		<i>106.473/09/04/2000</i>	
A	2, 6	<i>B4SISTD500</i>	<i>OP-UA3</i>	<i>B-400 DISTILLATE TANK D-500</i>		<i>106.478/09/04/2000</i>	
	4	B56P9GT96	OP-UA11	GT-96 TURBINE		46306	N059 PSDTX986
A	6, 7	<i>B56P9TK1</i>	<i>OP-SUMR</i>	<i>POWER 9 HCL STORAGE TANK</i>		<i>106.474/09/04/2000</i>	
A	3, 6	<i>BM54SIFU01</i>	<i>OP-SUMR</i>	<i>A/B METER STATION DISTILLATE TANK FUGITIVES</i>		<i>106.261/11/01/2003 [154810] 106.262/11/01/2003 [154810]</i>	
A	6, 7	<i>B73ESSTHCL</i>	<i>OP-SUMR</i>	<i>ENERGY SYSTEMS HCL TANK</i>		<i>106.532/09/04/2000</i>	
A	1, 6	<i>BM54SILR30</i>	<i>OP-UA4</i>	<i>A/B METER STATION DISTILLATE LOADING</i>		<i>106.473/09/04/2000</i>	

**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.
July 31, 2024	O2697	RN100225945

Unit/Process						Preconstruction Authorizations	
AI	Revision No.	ID No.	Applicable Form	Name/ Description	CAM	30 TAC Chapter 116/ 30 TAC Chapter 106	Title I
A	2, 6	<i>BM54SIST30</i>	<i>OP-UA3</i>	<i>A/B METER STATION DISTILLATE TANK D-301</i>		<i>106.478/09/04/2000</i>	

**Storage Tank/Vessel Attributes – Form OP-UA3 (Page 4)**  
**Federal Operating Permit Program**

**Table 4a: Title 30 Texas Administrative Code Chapter 115 (30 TAC Chapter 115)**  
**Subchapter B: Storage of Volatile Organic Compounds (VOCs)**

Date	Permit No.	Regulated Entity No.
July 31, 2024	O2697	RN100225945

Unit ID No.	SOP/GOP Index No.	Alternate Control Requirement	ACR ID No.	Product Stored	Storage Capacity	Throughput	Potential to Emit	Uncontrolled Emissions
<i>A25SISTT25</i>	<i>R5112-01</i>	<i>NO</i>		<i>OIL1</i>	<i>B1K-40K</i>			
<i>B4SISTD500</i>	<i>R5112-01</i>	<i>NO</i>		<i>OIL1</i>	<i>B1K-40K</i>			
<i>BM54SIST30</i>	<i>R5112-01</i>	<i>NO</i>		<i>OIL1</i>	<i>B1K-40K</i>			

**Storage Tank/Vessel Attributes – Form OP-UA3 (Page 5)**  
**Federal Operating Permit Program**

**Table 4b: Title 30 Texas Administrative Code Chapter 115 (30 TAC Chapter 115)**  
**Subchapter B: Storage of Volatile Organic Compounds (VOCs)**

Date	Permit No.	Regulated Entity No.
July 31, 2024	O2697	RN100225945

Unit ID No.	SOP/GOP Index No.	Construction Date	Tank Description	True Vapor Pressure	Primary Seal	Secondary Seal	Control Device Type	Control Device ID No.
<i>A25SISTT25</i>	<i>R5112-01</i>		<i>NONE1</i>	<i>1-</i>				
<i>B4SISTD500</i>	<i>R5112-01</i>		<i>NONE1</i>	<i>1-</i>				
<i>BM54SIST30</i>	<i>R5112-01</i>		<i>NONE1</i>	<i>1-</i>				

**Loading/Unloading Operations Attributes – Form OP-UA4 (Page 1)**  
**Federal Operating Permit Program**

**Table 1a: Title 30 Texas Administrative Code Chapter 115 (30 TAC Chapter 115)**  
**Subchapter C: Loading and Unloading of Volatile Organic Compounds**

Date	Permit No.	Regulated Entity No.
July 31, 2024	O2697	RN100225945

Unit ID No.	SOP/GOP Index No.	Chapter 115 Facility Type	Alternate Control Requirement (ACR)	ACR ID No.	Product Transferred	Transfer Type	True Vapor Pressure	Daily Through-put	Control Options
<i>A25SILRT25</i>	<i>R5211-01</i>	<i>OTHER</i>	<i>213B</i>		<i>VOC1</i>	<i>LOAD</i>	<i>0.5-11S</i>	<i>NCE2</i>	<i>CON</i>
<i>B4SILRD500</i>	<i>R5211-01</i>	<i>OTHER</i>	<i>213B</i>		<i>VOC1</i>	<i>LOAD</i>	<i>0.5-11S</i>	<i>NCE2</i>	<i>CON</i>
<i>BM54SILR30</i>	<i>R5211-01</i>	<i>OTHER</i>	<i>213B</i>		<i>VOC1</i>	<i>LOAD</i>	<i>0.5-11S</i>	<i>NCE2</i>	<i>CON</i>



**Loading/Unloading Operations Attributes – Form OP-UA4 (Page 2)**  
**Federal Operating Permit Program**

**Table 1b: Title 30 Texas Administrative Code Chapter 115 (30 TAC Chapter 115)**  
**Subchapter C: Loading and Unloading of Volatile Organic Compounds**

Date	Permit No.	Regulated Entity No.
July 31, 2024	O2697	RN100225945

Unit ID No.	SOP Index No.	Chapter 115 Control Device Type	Chapter 115 Control Device ID No.	Vapor-Tight	Vapor Space Holding Tank	Marine Terminal Exemptions	VOC Flash Point	Uncontrolled VOC Emissions
<i>A25SILRT25</i>	<i>R5211-01</i>	<i>NONE</i>		<i>NO</i>				
<i>B4SILRD500</i>	<i>R5211-01</i>	<i>NONE</i>		<i>NO</i>				
<i>BM54SILR30</i>	<i>R5211-01</i>	<i>NONE</i>		<i>NO</i>				

**Stationary Turbine Attributes – Form OP-UA11 (Page 11)**  
**Federal Operating Permit Program**

**Table 5: Title 40 Code of Federal Regulations Part 63 (40 CFR Part 63)**  
**Subpart YYYY: National Emission Standards for Hazardous Air Pollutants for Stationary Combustion Turbines**

Date	Permit No.	Regulated Entity No.
July 31, 2024	O2697	RN100225945

Unit ID No.	SOP Index No.	Construction/ Reconstruction Date	Rated Peak Power Output	Type of Service	Fuel Fired	Turbine Combustion Process	Oxidation Catalyst	Alternate Limitations	Previous Performance Test	Distillate Oil Fired
B56P9GT96	63YYYY-01	03+	1+	NORM	NG	<i>LNPMX</i>	<i>NO</i>	<i>ALT</i>		<i>NO</i>

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

Date:	July 31, 2024
Permit No.:	O2697
RN No.:	RN100225945

◆ For SOP applications, answer ALL questions unless otherwise directed.

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

<b>Form OP-REQ1: Page 87</b>			
<b>XII.NSR Authorizations (Attach additional sheets if necessary for sections E-J)</b>			
<b>E.PSD Permits and PSD Major Pollutants</b>			
PSD Permit No.: PSDTX986	Issuance Date: <del>10/13/2023</del> 05/28/2019	Pollutant(s):	
PSD Permit No.:	Issuance Date:	Pollutant(s):	
If PSD Permits are held for the application area, please complete the Major NSR Summary Table located under the Technical Forms heading at: <a href="http://www.tceq.texas.gov/permitting/air/titlev/site/site_experts.html">www.tceq.texas.gov/permitting/air/titlev/site/site_experts.html</a> .			
<b>F.Nonattainment (NA) Permits and NA Major Pollutants</b>			
NA Permit No.: N059	Issuance Date: <del>10/13/2023</del> 05/28/2019	Pollutant(s):	
NA Permit No.:	Issuance Date:	Pollutant(s):	
If NA Permits are held for the application area, please complete the Major NSR Summary Table located under the Technical Forms heading at: <a href="http://www.tceq.texas.gov/permitting/air/titlev/site/site_experts.html">www.tceq.texas.gov/permitting/air/titlev/site/site_experts.html</a> .			
<b>G.NSR Authorizations with FCAA 112(g) Requirements</b>			
NSR Permit No.:	Issuance Date:	NSR Permit No.:	Issuance Date:
NSR Permit No.:	Issuance Date:	NSR Permit No.:	Issuance Date:
NSR Permit No.:	Issuance Date:	NSR Permit No.:	Issuance Date:
<b>H.Title 30 TAC Chapter 116 Permits, Special Permits, Standard Permits, Other Authorizations (Other Than Permits By Rule, PSD Permits, NA Permits) for the Application Area</b>			
Authorization No.: 46306	Issuance Date: <del>10/13/2023</del> 05/28/2019	Authorization No.:	Issuance Date:
Authorization No.:	Issuance Date:	Authorization No.:	Issuance Date:
Authorization No.:	Issuance Date:	Authorization No.:	Issuance Date:
Authorization No.:	Issuance Date:	Authorization No.:	Issuance Date:

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

Date:	July 31, 2024
Permit No.:	O2697
RN No.:	RN100225945

*For SOP applications, answer ALL questions unless otherwise directed.*

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

<b>Form OP-REQ1: Page 88</b>	
<b>XII.NSR Authorizations (Attach additional sheets if necessary for sections E-J)</b>	
<b>I.Permits by Rule (30 TAC Chapter 106) for the Application Area</b>	
<i>A list of selected Permits by Rule (previously referred to as standard exemptions) that are required to be listed in the FOP application is available in the instructions.</i>	
Number: <b>106.261</b>	Version No./Date: <b>11/01/2003</b>
Number: <b>106.262</b>	Version No./Date: <b>11/01/2003</b>
Number: 106.263	Version No./Date: 11/01/2001
Number: 106.371	Version No./Date: 09/04/2000
Number: 106.454	Version No./Date: 07/08/1998; 11/01/2001
Number: <b>106.473</b>	Version No./Date: <b>09/04/2000</b>
Number: <b>106.474</b>	Version No./Date: <b>09/04/2000</b>
Number: <b>106.477</b>	Version No./Date: <b>09/04/2000</b>
Number: 106.478	Version No./Date: 09/04/2000
Number: 106.532	Version No./Date: 09/04/2000

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

<b>Date:</b> July 31, 2024	<b>Regulated Entity No.:</b> RN100225945	<b>Permit No.:</b> O2697
<b>Company Name:</b> The Dow Chemical Company	<b>Area Name:</b> Freeport Energy Center	

Revision No.	Unit/Group/Process		SOP/GOP Index No.	Pollutant	Applicable Regulatory Requirement	
	ID No.	Applicable Form			Name	Standard(s)
1	<i>A25SILRT25</i>	<i>OP-UA4</i>	<i>R5211-01</i>	<i>VOC</i>	<i>30 TAC Chapter 115, Loading and Unloading of VOC</i>	<i>115.213(b), 115.212(a)(3)(B), (a)(3)(E), 115.213(b)(1), (b)(4), [G](b)(6), 115.214(a)(1)(B), 115.214(a)(1)(D), (a)(1)(D)(ii)</i>
2	<i>A25SISTT25</i>	<i>OP-UA3</i>	<i>R5112-01</i>	<i>VOC</i>	<i>30 TAC Chapter 115, Storage of VOCs</i>	<i>115.111(a)(1)</i>
1	<i>B4SILRD500</i>	<i>OP-UA4</i>	<i>R5211-01</i>	<i>VOC</i>	<i>30 TAC Chapter 115, Loading and Unloading of VOC</i>	<i>115.213(b), 115.212(a)(3)(B), (a)(3)(E), 115.213(b)(1), (b)(4), [G](b)(6), 115.214(a)(1)(B), 115.214(a)(1)(D), (a)(1)(D)(ii)</i>
2	<i>B4SISTD500</i>	<i>OP-UA3</i>	<i>R5112-01</i>	<i>VOC</i>	<i>30 TAC Chapter 115, Storage of VOCs</i>	<i>115.111(a)(1)</i>
5	B56P9GT96	OP-UA11	63YYYY-01	HAPS	40 CFR Part 63, Subpart YYYY	63.6100-Table 1.1, 63.6100, Table 2.2, 63.6105(a), 63.6105(c), 63.6120(e), 63.6130(a), (a)-Table 4, 63.6140(a), 63.6165 63.6095(d)
1	<i>BM54SILR30</i>	<i>OP-UA4</i>	<i>R5211-01</i>	<i>VOC</i>	<i>30 TAC Chapter 115, Loading and Unloading of VOC</i>	<i>115.213(b), 115.212(a)(3)(B), (a)(3)(E), 115.213(b)(1), (b)(4), [G](b)(6), 115.214(a)(1)(B), 115.214(a)(1)(D), (a)(1)(D)(ii)</i>
2	<i>BM54SIST30</i>	<i>OP-UA3</i>	<i>R5112-01</i>	<i>VOC</i>	<i>30 TAC Chapter 115, Storage of VOCs</i>	<i>115.111(a)(1)</i>

**Applicable Requirements Summary**  
**Form OP-REQ3 (Page 2)**  
**Federal Operating Permit Program**  
**Table 1b: Additions**

<b>Date:</b> July 31, 2024	<b>Regulated Entity No.:</b> RN100225945	<b>Permit No.:</b> O2697
<b>Company Name:</b> The Dow Chemical Company	<b>Area Name:</b> Freeport Energy Center	

Revision No.	Unit/Group/ Process ID No.	SOP/GOP Index No.	Pollutant	Monitoring and Testing Requirements	Recordkeeping Requirements	Reporting Requirements
1	A25SILRT25	R5211-01	VOC	115.212(a)(3)(B), 115.213(b), 115.213(b)(1), 115.214(a)(1)(A), 115.214(a)(1)(A)(i), 115.215, (1), [G]115.215(2), (4), (9), (10)	115.213(b)(1), 115.216, (2), 115.216(3)(A), (3)(A)(i)-(iii), 115.216(3)(B)	115.213(b)(1)-(4)
2	A25SISTT25	R5112-01	VOC	[G]115.117	115.118(a)(1), (a)(5), (a)(7)	NONE
1	B4SILRD500	R5211-01	VOC	115.212(a)(3)(B), 115.213(b), 115.213(b)(1), 115.214(a)(1)(A), 115.214(a)(1)(A)(i), 115.215, (1), [G]115.215(2), (4), (9), (10)	115.213(b)(1), 115.216, (2), 115.216(3)(A), (3)(A)(i)-(iii), 115.216(3)(B)	115.213(b)(1)-(4)
2	B4SISTD500	R5112-01	VOC	[G]115.117	115.118(a)(1), (a)(5), (a)(7)	NONE
5	B56P9GT96	63YYYY-01	HAPS	63.6110(a), 63.6115, 63.6120(a), 63.6120(a)-Table 3.a-d, (b)-(e), 63.6125(b), (e), 63.6135(a), 63.6140(a)-Table 5.1-2, 63.6145(e)-(f) NONE	63.6125(e), 63.6135(b), 63.6155(a), (a)(1)-(2), (a)(5)-(6), [G]63.6155(a)(7), (c)-(d), 63.6160(a)-(c) NONE	63.6120(e), [G](f), 63.6130(b), 63.6140(b), 63.6145(a), <del>(b)</del> , (c), (e)-(f), 63.6150(a), (a)(1)-(3), [G](a)(5), 63.6151(a)-Table 6.1, <del>(a)-Table 6.3.1-3</del> , [G]63.6150(b), [G](d), [G](f), (g), [G]63.6150(h)-(i) <del>63.6145(d)</del>
1	BM54SILR30	R5211-01	VOC	115.212(a)(3)(B), 115.213(b), 115.213(b)(1), 115.214(a)(1)(A), 115.214(a)(1)(A)(i), 115.215, (1), [G]115.215(2), (4), (9), (10)	115.213(b)(1), 115.216, (2), 115.216(3)(A), (3)(A)(i)-(iii), 115.216(3)(B)	115.213(b)(1)-(4)
2	BM54SIST30	R5112-01	VOC	[G]115.117	115.118(a)(1), (a)(5), (a)(7)	NONE

**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
July 31, 2024	O2697	RN100225945

Unit ID No.	Registration No.	PBR No.	Registration Date
<i>A25SIFU01</i> <i>B4SIFU01</i> <i>BM54SIFU01</i>	<i>154810</i>	<i>106.261</i> <i>106.262</i>	<i>02/21/2019</i>
<i>B4ADFU01</i>	<i>50646</i>	<i>106.477</i>	<i>04/24/2002</i>
<i>B4ADFU01</i>	<i>153945</i>	<i>106.477</i>	<i>10/11/2018</i>

**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
July 31, 2024	O2697	RN100225945

Unit ID No.	PBR No.	Version No./Date
B56P9CWS1	106.371	09/04/2000
B56SEP001	106.532	09/04/2000
B58PWSC802	106.454	07/08/1998
PROPWRA PROPWRB PROPWRC	106.263	11/01/2001
<i>A25SILRT25</i> <i>B4SILRD500</i> <i>BM54SILR30</i>	<i>106.473</i>	<i>09/04/2000</i>
<i>A25SISTT25</i> <i>B4SISTD500</i> <i>BM54SIST30</i>	<i>106.478</i>	<i>09/04/2000</i>
<i>B56P9TK1</i>	<i>106.474</i>	<i>09/04/2000</i>
<i>B73ESSTHCL</i>	<i>106.532</i>	<i>09/04/2000</i>



**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
July 31, 2024	O2697	RN100225945

PBR No.	Version No./Date
N/A	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
July 31, 2024	O2697	RN100225945

Unit ID No.	PBR No.	Version No./Date Or Registration No.	Monitoring Requirement
<i>A25SIFU01 B4SIFU01 BM54SIFU01</i>	<i>106.261 106.262</i>	<i>154810</i>	<i>New piping components are managed in accordance with the current Leak Detection and Repair (LDAR) fugitive monitoring program.</i>
<i>B4ADFU01</i>	<i>106.477</i>	<i>50646</i>	<i>New piping components are managed in accordance with the current Leak Detection and Repair (LDAR) fugitive monitoring program.</i>
<i>B4ADFU01</i>	<i>106.477</i>	<i>153945</i>	<i>New piping components are managed in accordance with the current Leak Detection and Repair (LDAR) fugitive monitoring program.</i>
B56P9CWS1	106.371	09/04/2000	One-time verification by P&ID review indicates cooling system once through water will not be in direct contact with gaseous/liquid process streams containing carbon compounds.
B56SEP001	106.532	09/04/2000	Confirmation facility performs indicated function.
B58PWSC802	106.454	07/08/1998	Inspect equipment and record data monthly to ensure compliance with any applicable requirements in 115.412(1)(A)-(F).
PROPWRA PROPW RB PROPWRC	106.263	11/01/2001	Track emissions on a rolling 12-month basis.
<i>A25SILRT25 B4SILRD500 BM54SILR30</i>	<i>106.473</i>	<i>09/04/2000</i>	<i>Maintain records of annual throughput.</i>

**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
July 31, 2024	O2697	RN100225945

Unit ID No.	PBR No.	Version No./Date Or Registration No.	Monitoring Requirement
<i>A25SISTT25 B4SISTD500 BM54SIST30</i>	<i>106.478</i>	<i>09/04/2000</i>	<i>Maintain records of tank service and annual throughput.</i>
<i>B56P9TK1</i>	<i>106.474</i>	<i>09/04/2000</i>	<i>Maintain records of tank service and annual throughput.</i>
<i>B73ESSTHCL</i>	<i>106.532</i>	<i>09/04/2000</i>	<i>Confirmation facility performs indicated function.</i>

## Texas Commission on Environmental Quality

Title V Existing

2697

### Site Information (Regulated Entity)

What is the name of the permit area to be authorized?	FREEPORT ENERGY CENTER
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) (##.#####)	28.990833
Longitude (W) (-###.#####)	95.4075
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 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

2301 N BRAZOSPORT BLVD  
BLDG B-101  
FREEPORT  
TX  
77541  
9792389764  
  
9792380317  
FQFalcon@dow.com

## Technical Contact

Person TCEQ should contact for questions about this application:

Select existing TC contact or enter a new contact.

New Contact

Organization Name

The Dow Chemical Company

Prefix

MRS

First

Crystal

Middle

Kay

Last

Schmidt

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)

332 HIGHWAY 332 E

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

City

LAKE JACKSON

State

TX

ZIP

77566

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

9792381742

Extension

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

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

E-mail

cschmidt6@dow.com

## Title V General Information - Existing

1) Permit Type:

SOP

2) Permit Latitude Coordinate:

28 Deg 59 Min 27 Sec

3) Permit Longitude Coordinate:

95 Deg 24 Min 27 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

No

through permit conversion?

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

<a href=/ePermitsExternal/faces/file?fileId=209092>OP\_1\_Form\_OP-1.pdf</a>

Hash

8DA2BF65406D77FE5870D9C3FF5268A1213033481021EC74FBE092AB8A88A700

MIME-Type

application/pdf

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

[File Properties]

File Name

<a href=/ePermitsExternal/faces/file?fileId=209093>OP\_2\_Form\_OP-2.pdf</a>

Hash

F42241A8852FDDF18187787676981A36A7B4EEAA3AA1C199AE2B6DD9EA59CC5C

MIME-Type

application/pdf

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

[File Properties]

File Name

<a href=/ePermitsExternal/faces/file?fileId=209094>OP\_REQ1\_Form\_OP-REQ1.pdf</a>

Hash

1F354C666567208CA35500B22CEEF76CB2B13EDE5DC24DF34A8D1172FF57D725

MIME-Type

application/pdf

Attach OP-REQ2 (Negative Applicable Requirement Determinations)

Attach OP-REQ3 (Applicable Requirements Summary)

[File Properties]

File Name

<a href=/ePermitsExternal/faces/file?fileId=209095>OP\_REQ3\_Form\_OP-REQ3.pdf</a>

Hash

B708FAE2112BAB78FF80A81BBFC6610BF4203BC060B58717C8A0962A6322307B

MIME-Type

application/pdf

Attach OP-PBRSUP (Permits by Rule Supplemental Table)

[File Properties]

File Name

<a href=/ePermitsExternal/faces/file?fileId=209096>OP\_PBRSUP\_Form\_OP-PBRSUP.pdf</a>

Hash

6D190E61921FF8A3DAC13C3B1B4A904323AB922D103B8099036805C2959A9124

MIME-Type

application/pdf

Attach OP-SUMR (Individual Unit Summary for Revisions)

[File Properties]

File Name	<a href=/ePermitsExternal/faces/file?fileId=209097>OP_SUMR_Form_OP-SUMR.pdf</a>
Hash	CDAD1A7B3BD2B900E92DDE34341A48899055496CB304EDAAA9DF25ED4F6A1465
MIME-Type	application/pdf

Attach OP-MON (Monitoring Requirements)

Attach OP-UA (Unit Attribute) Forms

[File Properties]

File Name	<a href=/ePermitsExternal/faces/file?fileId=209099>Form_OP-UAs.pdf</a>
Hash	132C9D454DA5CFCA33C6F76696E42E3732BFB495425D5EB67291762C84EF94B9
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	<a href=/ePermitsExternal/faces/file?fileId=209100>Cover_Letter.pdf</a>
Hash	B10DBD7568F03BE04BAD23324106EBA7F35612C3E61E769A16855BA9DAFBDC43
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
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## 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 2697.
- 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:	165.225.33.15
Signature Date:	2024-07-31
Signature Hash:	4725663576DE3F41DE74D82CB21CFB9BFB69E4422881212DCE899ECE17426B81
Form Hash Code at time of Signature:	20C4CB269A51235CBE2C17D2248B2E048164DB0BE0C31DB7D127FCED4D5566D7

Submission

Reference Number:	The application reference number is 671477
Submitted by:	The application was submitted by ER028176/Fran Q Falcon
Submitted Timestamp:	The application was submitted on 2024-07-31 at 13:45:04 CDT
Submitted From:	The application was submitted from IP address 165.225.33.15
Confirmation Number:	The confirmation number is 554161
Steers Version:	The STEERS version is 6.79
Permit Number:	The permit number is 2697

Additional Information

Application Creator: This account was created by Crystal Schmidt