

**From:** [Johnny Bowers](#)  
**To:** [Rosa Mora-Nichols](#)  
**Subject:** FW: STEERS Title V Application Submittal (New Application)  
**Date:** Monday, September 16, 2024 9:56:31 AM

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Please process. Thanks!

-----Original Message-----

From: [steers@tceq.texas.gov](mailto:steers@tceq.texas.gov) <[steers@tceq.texas.gov](mailto:steers@tceq.texas.gov)>  
Sent: Friday, September 13, 2024 10:34 AM  
To: RFCAIR12 <[RFCAIR12@tceq.texas.gov](mailto:RFCAIR12@tceq.texas.gov)>; [karenc@brazoria-county.com](mailto:karenc@brazoria-county.com); TVAPPS <[tvapps@tceq.texas.gov](mailto:tvapps@tceq.texas.gov)>  
Subject: STEERS Title V Application Submittal (New Application)

The TV-E application has been successfully submitted by JOHN SAMPSON. The submittal was received at 09/13/2024 10:34 AM.

The Reference number for this submittal is 682368

The confirmation number for this submittal is 563163.

The Area ID for this submittal is 2220.

The Project ID for this submittal is 37144.

The hash code for this submittal is

7082B1C97D1002D784CC6EEF9E1438C8B897DA05EC8FA90B58FBB2E4D9F0A672.

You may access the original application submittal and the notice of final action documents from the COR Viewer which is available at <https://ida.tceq.texas.gov/steersstaff/index.cfm?fuseaction=openadmin.submitlog&newsearch=yes>.

If you have any questions, please contact the STEERS Help Line at 512-239-6925 or by e-mail at [steers@tceq.texas.gov](mailto:steers@tceq.texas.gov).

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

Date:	September 12, 2024
Permit No.:	O2220
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: 106.124	Version No./Date: 09/04/2000
Number: 106.261	Version No./Date: 12/24/1998; 11/01/2003
Number: 106.262	Version No./Date: 03/14/1997; 12/24/1998; 09/04/2000; 11/01/2003
Number: 106.263	Version No./Date: 11/01/2001
Number: 106.264	Version No./Date: 09/04/2000
Number: <b>106.265</b>	Version No./Date: <b>09/04/2000</b>
Number: 106.371	Version No./Date: 03/14/1997; 09/04/2000
Number: 106.433	Version No./Date: 09/04/2000
Number: 106.452	Version No./Date: 03/14/1997
Number: 106.454	Version No./Date: 11/01/2001
Number: 106.472	Version No./Date: 09/04/2000
Number: 106.511	Version No./Date: 09/04/2000
Number: 51	Version No./Date: 07/20/1992
Number:	Version No./Date:
Number:	Version No./Date:

**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
September 11, 2024	O2220	RN100225945

Unit ID No.	Registration No.	PBR No.	Registration Date
A26VEFU1	34249	106.261 106.264	08/25/2015
A26VEFU1	155127	106.262	02/05/2019
B105MTPA1	161796	106.433	07/14/2020
A26VESV510 A26VEST19A A26VEST511 A26VEST275 A26VEST550	164045	106.262	03/02/2021
A26VEFU1	174026	106.262	09/26/2023

**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
September 11, 2024	O2220	RN100225945

Unit ID No.	PBR No.	Version No./Date
A26VECT3	106.371	09/04/2000
A26ST20F A26VEFU1	106.472	09/04/2000
A26ST500B	106.472	09/04/2000
PROMTC PROVER	106.263	11/01/2001
<i>Hand-Held and Manually Operated Machines</i>	<i>106.265</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
September 11, 2024	O2220	RN100225945

PBR No.	Version No./Date
106.122	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
September 11, 2024	O2220	RN100225945

Unit ID No.	PBR No.	Version No./Date Or Registration No.	Monitoring Requirement
A26VEFU1	106.261 106.264	34249	New piping components are managed in accordance with the current Leak Detection and Repair (LDAR) fugitive monitoring program 28MID as required by NSR 1472 SC #30 (Issued 10/27/2022)
A26VEFU1	106.262	155127	New piping components are managed in accordance with the current Leak Detection and Repair (LDAR) fugitive monitoring program 28MID as required by NSR 1472 SC #30 (Issued 10/27/2022)
B105MTPA1	106.433	161796	Maintain records to ensure compliance with 106.433(4)-(8)
A26VESV510 A26VEST19A A26VEST511 A26VEST275 A26VEST550	106.262	164045	Tanks will continue to meet the monitoring and recordkeeping requirements of NSR 1472 SC #8, SC #9, and SC #11 (Issued 10/27/2022).
A26VEFU1	106.262	174026	New piping components are managed in accordance with the current Leak Detection and Repair (LDAR) fugitive monitoring program 28MID as required by NSR 1472 SC #30 (Issued 10/27/2022)
A26VECT3	106.371	09/04/2000	Cooling tower will continue to meet the monitoring and recordkeeping requirements of NSR 1472 SC #18 (Issued 10/27/2022).
A26ST20F A26VEFU1	106.472	09/04/2000	Tank will continue to meet the monitoring and recordkeeping requirements of NSR 1472 SC #9 and SC #11 (Issued 10/27/2022).  New piping components are managed in accordance with the current Leak Detection and Repair (LDAR) fugitive monitoring program 28MID as required by NSR 1472 SC #30 (Issued 10/27/2022)

**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
September 11, 2024	O2220	RN100225945

Unit ID No.	PBR No.	Version No./Date Or Registration No.	Monitoring Requirement
A26ST500B	106.472	09/04/2000	Tank will continue to meet the monitoring and recordkeeping requirements of NSR 1472 SC #9 and SC #11 (Issued 10/27/2022).
PROMTC PROVER	106.263	11/01/2001	Track emissions on a rolling 12-month basis.
<i>Hand-Held and Manually Operated Machines</i>	<i>106.265</i>	<i>09/04/2000</i>	<i>Maintain documentation to ensure the hand-held or manually operated machines are used for buffing, polishing, carving, cutting, drilling, machining, routing, sanding, sawing, surface grinding, or turning of ceramic artwork, ceramic precision parts, leather, metals, plastics, fiber board, masonry, carbon, glass, graphite, or wood.</i>

**Federal Operating Permit Program**  
**Application for Permit Revision/Renewal**  
**Form OP-2 – Table 1**

Date: <b>September 12, 2024</b>	
Permit No.: <b>O2220</b>	
Regulated Entity No.: <b>RN100225945</b>	
Company Name: <b>The Dow Chemical Company</b>	
For Submissions to EPA	
Has an electronic copy of this application been submitted (or is being submitted) to EPA? <span style="float: right;"><input checked="" type="checkbox"/> YES <input type="checkbox"/> NO</span>	
<b>I. Application Type</b>	
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	
<b>II. Qualification Statement</b>	
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)**

<b>III. Major Source Pollutants (Complete this section if the permit revision is due to a change at the site or change in regulations.)</b>
Indicate all pollutants for which the site is a major source based on the site's potential to emit: (Check the appropriate box[es].)
<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"/> HAP
Other:
<b>IV. Reference Only Requirements (For reference only)</b>
Has the applicant paid emissions fees for the most recent agency fiscal year (September 1 - August 31)? <span style="float: right;"><input checked="" type="checkbox"/> YES <input type="checkbox"/> NO <input type="checkbox"/> N/A</span>
<b>V. Delinquent Fees and Penalties</b>
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**

Date: <b>September 12, 2024</b>
Permit No.: <b>O2220</b>
Regulated Entity No.: <b>RN100225945</b>
Company Name: <b>The Dow Chemical Company</b>

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	N/A	OP-REQ1 (Page 88 only)	N/A	Please add PBR 106.265/09/04/2000 to the list of authorizations for this area via Form OP-REQ1 (Page 88).
2	MS-C	NO	N/A	OP-SUMR OP-PBR SUP	N/A	Please update the PBR Supplemental Table to include any changes that have been made since the 2024 Renewal (Project #36526).

**Federal Operating Permit Program  
Application for Permit Revision/Renewal  
Form OP-2-Table 3**

Date: <b>September 12, 2024</b>	
Permit No.: <b>O2220</b>	
Regulated Entity No.: <b>RN100225945</b>	
Company Name: <b>The Dow Chemical Company</b>	
<b>I. Significant Revision</b> <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? <span style="float: right;"><input checked="" type="checkbox"/> YES <input type="checkbox"/> NO</span>
B.	Indicate the alternate language(s) in which public notice is required: <b>Spanish</b>
C.	Will, there be a change in air pollutant emissions as a result of the significant revision? <span style="float: right;"><input type="checkbox"/> YES <input checked="" type="checkbox"/> NO</span>



September 12, 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; RN100225945  
Versene, Land Tran, and Site MTC - Title V Operating Permit O2220  
Permit Minor Revision Application**

Dear Mr. Bowers,

The Dow Chemical Company (Dow) is submitting the Title V Operating Permit O2220 Minor Revision Application for the Versene, Land Tran, and Site MTC plant located in Freeport County, Texas. This minor revision application is submitted in accordance with 30 TAC Chapter 122, Subchapter, C §122.215, §122.216, and §122.217.

Please do not hesitate to contact me at [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 Environmental Health Director

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

## Texas Commission on Environmental Quality

Title V Existing

2220

### Site Information (Regulated Entity)

What is the name of the permit area to be authorized?	VERSENE LAND TRAN AND SITE MTC
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 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 (###-###-####)	9792389978
Extension	
Alternate Phone (###-###-####)	
Fax (###-###-####)	
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 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

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)

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

[File Properties]

File Name

<a href=/ePermitsExternal/faces/file?fileId=216377>OP\_2\_Form OP-2.pdf</a>

Hash

FA74BED45377E501BAF87ECA541BD1B6F3118035ACDA848AFD0E0D4E690EA590

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=216378>OP\_REQ1\_Form OP-REQ1.pdf</a>

Hash

50502304FFEE32BC9501C5E598137E3E9B9A6233E42BE1B6D6A6A0FAFFE2C45A

MIME-Type

application/pdf

Attach OP-REQ2 (Negative Applicable Requirement Determinations)

Attach OP-REQ3 (Applicable Requirements Summary)

Attach OP-PBRSUP (Permits by Rule Supplemental Table)

[File Properties]

File Name

<a href=/ePermitsExternal/faces/file?fileId=216379>OP\_PBRSUP\_Form OP-PBRSUP.pdf</a>

Hash

EBB2D30BE2920667C06C5036CA9E18B1DEB18ED167EF92956CD3173F0C5713F3

MIME-Type

application/pdf

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 any other necessary information needed to complete the permit.

[File Properties]

File Name	<a href=/ePermitsExternal/faces/file?fileId=216380>Cover Letter.pdf</a>
Hash	CB2DDFF19CC7420E223D35E959244FF211DD00C0947788560042ED7D5A6517CB
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 2220.
- 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:	170.85.99.27
Signature Date:	2024-09-13
Signature Hash:	4725663576DE3F41DE74D82CB21CFB9BFB69E4422881212DCE899ECE17426B81
Form Hash Code at time of Signature:	7082B1C97D1002D784CC6EEF9E1438C8B897DA05EC8FA90B58FBB2E4D9F0A672

Submission

Reference Number:	The application reference number is 682368
Submitted by:	The application was submitted by ER028176/Fran Q Falcon
Submitted Timestamp:	The application was submitted on 2024-09-13 at 10:33:58 CDT
Submitted From:	The application was submitted from IP address 170.85.99.27

Confirmation Number:

The confirmation number is 563163

Steers Version:

The STEERS version is 6.82

Permit Number:

The permit number is 2220

## Additional Information

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Application Creator: This account was created by Crystal Schmidt

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