

## Texas Commission on Environmental Quality

Title V Existing

2221

### Site Information (Regulated Entity)

What is the name of the permit area to be authorized?	SPECIALTY CHEMICALS 2
Does the site have a physical address?	Yes
Physical Address	
Number and Street	2301 N BRAZOSPORT BLVD
City	FREEPORT
State	TX
ZIP	77541
County	BRAZORIA
Latitude (N) (##.#####)	28.9825
Longitude (W) (-###.#####)	95.352777
Primary SIC Code	2869
Secondary SIC Code	
Primary NAICS Code	325199
Secondary NAICS Code	
Regulated Entity Site Information	
What is the Regulated Entity's Number (RN)?	RN100225945
What is the name of the Regulated Entity (RE)?	DOW TEXAS OPERATIONS FREEPORT
Does the RE site have a physical address?	Yes
Physical Address	
Number and Street	2301 N BRAZOSPORT BLVD
City	FREEPORT
State	TX
ZIP	77541
County	BRAZORIA
Latitude (N) (##.#####)	28.9825
Longitude (W) (-###.#####)	-95.352777
Facility NAICS Code	
What is the primary business of this entity?	INDUSTRIAL CHEMICAL MANUFACTURING PLANT

### Customer (Applicant) Information

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

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

## Responsible Official Contact

Person TCEQ should contact for questions about this application:

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

## Duly Authorized Representative Contact

Person TCEQ should contact for questions about this application

Select existing DAR contact or enter a new contact.

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

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

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

4093925054

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?

Update

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

2221-37167

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=248957>2025-04-01\_NOD\_Response\_O2221.pdf</a>

Hash

2E62037297FCE81DFCC926C80CE4E3834E7648E1239D5F0C241FA1DF45FC21CD

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 2221.
- 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:	2025-04-04
Signature Hash:	47028DDAF3697FA5C70F77C16A06E50F53CC1EEEEAEF487D89AB53CE34D67B713
Form Hash Code at time of Signature:	B5A4F64C32B6CC16AA8B9E2959D2689FE0861926F28734279A1F325CB114BEB0

Submission

Reference Number:	The application reference number is 774890
Submitted by:	The application was submitted by ER028176/Fran Q Falcon
Submitted Timestamp:	The application was submitted on 2025-04-04 at 13:10:48 CDT
Submitted From:	The application was submitted from IP address 170.85.99.3
Confirmation Number:	The confirmation number is 644478
Steers Version:	The STEERS version is 6.89
Permit Number:	The permit number is 2221

Additional Information

Application Creator: This account was created by Crystal Schmidt

**From:** Schmidt, Crystal (C) <cschmidt6@dow.com>  
**Sent:** Tuesday, April 1, 2025 10:41 AM  
**To:** Carolyn Maus  
**Subject:** RE: Working Draft Permit Review -- FOP O2221/Project 37167, The Dow Chemical Company/Dow Texas Operations Freeport  
**Attachments:** 2025-04-01\_NOD\_Response\_O2221.pdf

Carolyn,

Please see the attached. I also uploaded into STEERS so our DAR can submit. Thanks!

*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

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**From:** Carolyn Maus <[carolyn.maus@tceq.texas.gov](mailto:carolyn.maus@tceq.texas.gov)>  
**Sent:** Friday, March 28, 2025 2:32 PM  
**To:** Schmidt, Crystal (C) <[cschmidt6@dow.com](mailto:cschmidt6@dow.com)>  
**Subject:** RE: Working Draft Permit Review -- FOP O2221/Project 37167, The Dow Chemical Company/Dow Texas Operations Freeport

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

Hi Crystal,

The project has gone through our internal quality and management reviews. The only correction that came up was my team leader noticed a unit missing from one of the OP-PBRSUP tables. Then I also saw two typos while looking into that. Here are the items that need correction:

- 1) Table D of the OP-PBRSUP is missing one unit that was on Table A – B13PGST222. Please add that.

- 2) For the Table D row for PROGMA, PROIPG, PROPGA, and PROPGE, there is a typo in the PBR version date for 106.263. It should be 11/01/2001, not 11/01/2003.
- 3) In the Table D row right below that, the unit ID B13PGST1226 is listed but should be B13PGST226.

Please correct these items, re-date all four tables of the OP-PBRSUP, and re-submit as a set by **Wednesday, April 2, 2025**. You can upload this in STEERS like previous updates. Once we get this correction, we can send this project to public announcement.

Thanks, and my apologies for not catching these during earlier review.

Sincerely,

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



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



April 1, 2025

**E-MAIL RESPONSE**

Texas Commission on Environmental Quality  
ATTN: Ms. Carolyn Maus  
Air Permits Division, MC-163  
P.O. Box 13087  
Austin, TX 78711-3087

**The Dow Chemical Company, CN600356976**  
**Specialty Chemicals 2, RN100225945**  
**Title V Operating Permit NOD Response for Specialty Chemicals 2, O2221**  
**TCEQ Project Number: 37167**

Dear Ms. Maus,

The Dow Chemical Company (Dow) is providing a response to the Notice of Deficiency (NOD) items provided on March 28, 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>	Table D the OP-PBRSUP is missing one unit that was on Table A – B13PGST222. Please add that.
<b>Item 1 Response</b>	<b>Please see the attached Form OP-PBRSUP for more information.</b>
<b>Item 2</b>	For the Table D row for PROGMA, PROIPG, PROPGA, and PROPGE, there is a typo in the PBR version date for 106.263. It should be 11/01/2001, not 11/01/2003.
<b>Item 2 Response</b>	<b>Please see the attached Form OP-PBRSUP for more information.</b>
<b>Item 3</b>	In the Table D row right below that, the unit ID B13PGST1226 is listed but should be B13PGST226.
<b>Item 3 Response</b>	<b>Please see the attached Form OP-PBRSUP for more information.</b>

**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
April 1, 2025	O2221	RN100225945

Unit ID No.	Registration No.	PBR No.	Registration Date
B17PEFU01	157525	106.262	07/12/2019
B13PGFU1	123137	106.262	09/15/2014
B13OL601 B13BH601	124588	106.262	11/24/2014
B13PGFU1	134008	106.262	08/21/2015
B13WJMA01	144226	106.262	12/15/2016 05/22/2018
B13SCPOLY B13PGST662 B13PGST670 B13PGST243 B13PGRX1	152066	106.262	07/11/2018
B13PGFU1	152733	106.261 106.262	08/16/2018
B13PGFU1	153856	106.261 106.262	11/05/2018
B13PGFU1 B43IPFU1	156462	106.262	05/17/2019
B13PGFU1 B13PTD2T	157242	106.262	08/06/2019 09/28/2020
B13PGFU1	158135	106.261 106.262	09/10/2019

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

Date	Permit Number	Regulated Entity Number
April 1, 2025	O2221	RN100225945

Unit ID No.	Registration No.	PBR No.	Registration Date
B43IPST130	159782	106.261 106.262	02/20/2020
B43IPFU1	160340	106.262	03/27/2020
B13PGML43 B13PGFAP67 B13PGFAP26	160643	106.262	05/14/2020
B13PGST202 B13PGST205	162153	106.261 106.262	08/25/2020
B13PGSP22	164720	106.261	05/11/2021
B13PGST226 B13PGST256	165980	106.262	08/24/2021
B39GMFU1	106612	106.261 106.262	01/17/2013
B39GMFU1	115993	106.261 106.262	03/05/2014
B39GMFU1	121638	106.262	08/04/2014
B39GMFU1 B39GMLR2 B39GMST264 B39GMST70A B39GMST70B	B39GMST75A B39GMST75B B39GMST801 B39GMVH290 B39GMWT257 123961	106.261 106.262	10/31/2014
B39GMFU1	151705	106.262	05/21/2018

**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
April 1, 2025	O2221	RN100225945

Unit ID No.	Registration No.	PBR No.	Registration Date
B39GMFU1 B39GMFU3	153454	106.261 106.262	10/26/2018
B39GMFU1 B39GMVH290	156122	106.262	04/16/2019
B39GMFU1	156047	106.261 106.262	04/25/2019
B39GMFU1	160836	106.262	04/21/2020
B39GMFU1	161122	106.261 106.262	05/13/2020
B39GMFU1	163567	106.262	01/02/2021
B39GMFU3	149152	106.262	12/13/2017
B39GMST801	152933	106.262	08/16/2018
B13PGST222	168074	106.262	04/18/2022
B39GMFU1	164874	106.262	05/27/2021
B39GMFU1	175271	106.261 106.262	02/02/2024
B17PEFU01	169380	106.262	06/17/2022

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

Date	Permit Number	Regulated Entity Number
April 1, 2025	O2221	RN100225945

Unit ID No.	Registration No.	PBR No.	Registration Date
B13PGST243 B13PGR5 B13PGST622 B13PGML43 B13PGFAP67 B13PGFA26	168130	106.262	03/25/2022
B17PEFU01 B17PELR1	177535	106.261 106.262	<b>10/08/2024</b>

**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
April 1, 2025	O2221	RN100225945

Unit ID No.	PBR No.	Version No./Date
PROGMA PROIPG PROPGA PROPGE	106.263	11/01/2001
B13PGST226	106.472	09/04/2000
B43IPST117	106.478	09/04/2000
B13PGST670	106.478	09/04/2000
B13PGST506 B13PGST508	106.472 106.478	09/04/2000 09/04/2000
B13PGFU1	106.373	09/04/2000
B43IPST170	106.478	09/04/2000
B43IPST171	106.478	09/04/2000
B13PGFU1	106.373	09/04/2000

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

Date	Permit Number	Regulated Entity Number
April 1, 2025	O2221	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
April 1, 2025	O2221	RN100225945

Unit ID No.	PBR No.	Version No./Date Or Registration No.	Monitoring Requirement
B17PEFU01	106.262	157525	New piping components are managed in accordance with the current Leak Detection and Repair (LDAR) fugitive monitoring program (28VHP, 28CNTQ, and AVO) as required by NSR 75721 SCs 5-8 (Permit Issue Date 01/17/2017).
B13PGFU1	106.262	123137	New piping components are managed in accordance with the current Leak Detection and Repair (LDAR) fugitive monitoring programs (28MID) as required by NSR 18561 SC 6 (Permit Issue Date 09/10/2019).
B13OL601 B13BH601	106.262	124588	Maintain records of loading rack annual throughput.
B13PGFU1	106.262	134008	New piping components are managed in accordance with the current Leak Detection and Repair (LDAR) fugitive monitoring programs (28MID) as required by NSR 18561 SC 6 (Permit Issue Date 09/10/2019).
B13WJMA01	106.262	144226	New piping components are managed in accordance with the current Leak Detection and Repair (LDAR) fugitive monitoring programs (28MID) as required by NSR 18561 SC 6 (Permit Issue Date 09/10/2019).
B13SCPOLY B13PGST662 B13PGST670	B13PGST243 B13PGRX1	106.262	152066
B13PGFU1	106.261 106.262	152733	New piping components are managed in accordance with the current Leak Detection and Repair (LDAR) fugitive monitoring programs (28MID) as required by NSR 18561 SC 6 (Permit Issue Date 09/10/2019).
B13PGFU1	106.261 106.262	153856	New piping components are managed in accordance with the current Leak Detection and Repair (LDAR) fugitive monitoring programs (28MID) as required by NSR 18561 SC 6 (Permit Issue Date 09/10/2019).



**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
April 1, 2025	O2221	RN100225945

Unit ID No.	PBR No.	Version No./Date Or Registration No.	Monitoring Requirement
B13PGFU1 B43IPFU1	106.262	156462	New piping components are managed in accordance with the current Leak Detection and Repair (LDAR) fugitive monitoring programs (28MID) as required by NSR 18561 SC 6 (Permit Issue Date 09/10/2019).
B13PGFU1 B13PTD2T	106.262	157242	New piping components are managed in accordance with the current Leak Detection and Repair (LDAR) fugitive monitoring programs (28MID) as required by NSR 18561 SC 6 (Permit Issue Date 09/10/2019).
B13PGFU1	106.261 106.262	158135	New piping components are managed in accordance with the current Leak Detection and Repair (LDAR) fugitive monitoring programs 28MID.
B43IPST130	106.261 106.262	159782	Maintain records of tank service and annual throughput.
B43IPFU1	106.262	160340	New piping components are managed in accordance with the current Leak Detection and Repair (LDAR) fugitive monitoring programs 28MID.
B13PGML43 B13PGFAP67 B13PGFAP26	106.262	160643	Maintain records of loading rack annual throughput.
B13PGST202 B13PGST205	106.261 106.262	162153	Maintain records of tank service and annual throughput.
B13PGSP22	106.261	164720	New piping components are managed in accordance with the current Leak Detection and Repair (LDAR) fugitive monitoring programs 28MID.
B13PGST226 B13PGST256	106.262	165980	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
April 1, 2025	O2221	RN100225945

Unit ID No.	PBR No.	Version No./Date Or Registration No.	Monitoring Requirement
B39GMFU1	106.261 106.262	106612	New piping components are managed in accordance with the current Leak Detection and Repair (LDAR) fugitive monitoring program (28MID, 28CNTQ, 28PI and AVO) as required by NSR 104144 SC 13 (Permit Issue Date 02/08/2023).
B39GMFU1	106.261 106.262	115993	New piping components are managed in accordance with the current Leak Detection and Repair (LDAR) fugitive monitoring program (28MID, 28CNTQ, 28PI and AVO) as required by NSR 104144 SC 13 (Permit Issue Date 02/08/2023).
B39GMFU1	106.262	121638	New piping components are managed in accordance with the current Leak Detection and Repair (LDAR) fugitive monitoring program (28MID, 28CNTQ, 28PI and AVO) as required by NSR 104144 SC 13 (Permit Issue Date 02/08/2023).
B39GMFU1 B39GMLR2 B39GMST264 B39GMST70A B39GMST70B	B39GMST75A B39GMST75B B39GMST801 B39GMVH290 B39GMWT257	106.261 106.262	123961  New piping components are managed in accordance with the current Leak Detection and Repair (LDAR) fugitive monitoring program (28MID, 28CNTQ, 28PI and AVO) as required by NSR 104144 SC 13 (Permit Issue Date 02/08/2023).  Maintain records of tank service and annual throughput.  Maintain records of loading rack annual throughput.
B39GMFU1	106.262	151705	New piping components are managed in accordance with the current Leak Detection and Repair (LDAR) fugitive monitoring program (28MID, 28CNTQ, 28PI and AVO) as required by NSR 104144 SC 13 (Permit Issue Date 02/08/2023).
B39GMFU1 B39GMFU3	106.261 106.262	153454	New piping components are managed in accordance with the current Leak Detection and Repair (LDAR) fugitive monitoring program (28MID, 28CNTQ, 28PI and AVO) as required by NSR 104144 SC 13 (Permit Issue Date 02/08/2023).
B39GMFU1 B39GMVH290	106.262	156122	New piping components are managed in accordance with the current Leak Detection and Repair (LDAR) fugitive monitoring program (28MID, 28CNTQ, 28PI and AVO) as required by NSR 104144 SC 13 (Permit Issue Date 02/08/2023).

**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
April 1, 2025	O2221	RN100225945

Unit ID No.	PBR No.	Version No./Date Or Registration No.	Monitoring Requirement
B39GMFU1	106.261 106.262	156047	New piping components are managed in accordance with the current Leak Detection and Repair (LDAR) fugitive monitoring program (28MID, 28CNTQ, 28PI and AVO) as required by NSR 104144 SC 13 (Permit Issue Date 02/08/2023).
B39GMFU1	106.262	160836	New piping components are managed in accordance with the current Leak Detection and Repair (LDAR) fugitive monitoring program (28MID, 28CNTQ, 28PI and AVO) as required by NSR 104144 SC 13 (Permit Issue Date 02/08/2023).
B39GMFU1	106.261 106.262	161122	New piping components are managed in accordance with the current Leak Detection and Repair (LDAR) fugitive monitoring program (28MID, 28CNTQ, 28PI and AVO) as required by NSR 104144 SC 13 (Permit Issue Date 02/08/2023).
B39GMFU1	106.262	163567	New piping components are managed in accordance with the current Leak Detection and Repair (LDAR) fugitive monitoring program (28MID, 28CNTQ, 28PI and AVO) as required by NSR 104144 SC 13 (Permit Issue Date 02/08/2023).
B39GMFU3	106.262	149152	New piping components are managed in accordance with the current Leak Detection and Repair (LDAR) fugitive monitoring program (28MID, 28CNTQ, 28PI and AVO) as required by NSR 104144 SC 13 (Permit Issue Date 02/08/2023).
B39GMST801	106.262	152933	Maintain records of tank service and annual throughput.
PROGMA PROIPG PROPGA PROPGE	106.263	<del>11/01/2001</del> 11/01/2003	Track emissions on a rolling 12-month basis.
<del>B13PGST226</del> B13PGST1226	106.472	09/04/2000	Maintain records of tank service and annual throughput.
B43IPST117	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
April 1, 2025	O2221	RN100225945

Unit ID No.	PBR No.	Version No./Date Or Registration No.	Monitoring Requirement
B13PGST670	106.478	09/04/2000	Maintain records of tank service and annual throughput.
B13PGST506 B13PGST508	106.472 106.478	09/04/2000	Maintain records of tank service and annual throughput.
B13PGFU1	106.373	09/04/2000	Maintain records of additions to refrigeration system.
B43IPST170	106.478	09/04/2000	Maintain records of tank service and annual throughput.
B43IPST171	106.478	09/04/2000	Maintain records of tank service and annual throughput.
B13PGFU1	106.373	09/04/2000	Maintain records of refrigerant addition.
B39GMFU1	106.262	164874	New piping components are managed in accordance with the current Leak Detection and Repair (LDAR) fugitive monitoring program (28MID, 28CNTQ, 28PI and AVO) as required by NSR 104144 SC 13 (Permit Issue Date 02/08/2023).
B39GMFU1	106.261 106.262	175271	New piping components are managed in accordance with the current Leak Detection and Repair (LDAR) fugitive monitoring program (28MID, 28CNTQ, 28PI and AVO) as required by NSR 104144 SC 13 (Permit Issue Date 02/08/2023).
B17PEFU01	106.262	169380	New piping components are managed in accordance with the current Leak Detection and Repair (LDAR) fugitive monitoring program (28VHP, 28CNTQ, and AVO) as required by NSR 75721 SCs 5-8 (Permit Issue Date 01/17/2017).

**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
April 1, 2025	O2221	RN100225945

Unit ID No.	PBR No.	Version No./Date Or Registration No.	Monitoring Requirement
B13PGST243 B13PGR5 B13PGST622 B13PGML43 B13PGFAP67 B13PGFA26	106.262	168130	Tanks will continue to meet the monitoring and recordkeeping requirements of NSR 18561 SC 8 and SC 9 (permit issue date 09/10/2019) for tank service and annual throughput.  Scrubber will continue to meet the requirements of NSR 18561 SC 22 (permit issue date 9/10/2019).  Maintain records of magsil addition.  Maintain records of filter-aid addition.
B17PEFU01 B17PELR1	106.261 106.262	177535	New piping components are managed in accordance with the current Leak Detection and Repair (LDAR) fugitive monitoring program (28VHP, 28CNTQ, and AVO) as required by NSR 75721 SCs 5-8 (Permit Issue Date 01/17/2017).  Maintain records of annual throughput.
<i>B13PGST222</i>	<i>106.262</i>	<i>168074</i>	<i>Tank will continue to meet the monitoring and recordkeeping requirements of NSR 18561 SC 8 and SC 9 (permit issue date 09/10/2019) for tank service and annual throughput.</i>

## Texas Commission on Environmental Quality

Title V Existing

2221

### Site Information (Regulated Entity)

What is the name of the permit area to be authorized?	SPECIALTY CHEMICALS 2
Does the site have a physical address?	Yes
Physical Address	
Number and Street	2301 N BRAZOSPORT BLVD
City	FREEPORT
State	TX
ZIP	77541
County	BRAZORIA
Latitude (N) (##.#####)	28.9825
Longitude (W) (-###.#####)	95.352777
Primary SIC Code	2869
Secondary SIC Code	
Primary NAICS Code	325199
Secondary NAICS Code	
Regulated Entity Site Information	
What is the Regulated Entity's Number (RN)?	RN100225945
What is the name of the Regulated Entity (RE)?	DOW TEXAS OPERATIONS FREEPORT
Does the RE site have a physical address?	Yes
Physical Address	
Number and Street	2301 N BRAZOSPORT BLVD
City	FREEPORT
State	TX
ZIP	77541
County	BRAZORIA
Latitude (N) (##.#####)	28.9825
Longitude (W) (-###.#####)	-95.352777
Facility NAICS Code	
What is the primary business of this entity?	INDUSTRIAL CHEMICAL MANUFACTURING PLANT

### Customer (Applicant) Information

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

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

## Responsible Official Contact

Person TCEQ should contact for questions about this application:

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

## Duly Authorized Representative Contact

Person TCEQ should contact for questions about this application

Select existing DAR contact or enter a new contact.

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

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

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.

Organization Name

Prefix

First

Middle

Last

Suffix

Credentials

Title

Enter new address or copy one from list:

Mailing Address

Address Type

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

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

City

State

ZIP

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

Extension

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

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

E-mail

CRYSTAL SCHMIDT(THE DOW CHEMICA... )

THE DOW CHEMICAL COMPANY

MRS

CRYSTAL

SCHMIDT

AIR PERMIT MANAGER

Domestic

332 HIGHWAY 332 E

LAKE JACKSON

TX

77566

4093925054

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?

Update

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

2221-37167

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)

[File Properties]

File Name

<a href=/ePermitsExternal/faces/file?fileId=242152>OP\_PBRSUP\_02-24-2025\_O2221\_OP-PBRSUP.pdf</a>

Hash

F29C4CBB9820499EFA034B505A0BE580FA2320A990043710FE17379B82BF720B

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 Void Request Form

Attach any other necessary information needed to complete the permit.

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

## Certification

---

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

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

- 3. I have personally examined the foregoing and am familiar with its content and the content of any attachments, and based upon my personal knowledge and/or inquiry of any individual responsible for information contained herein, that this information is true, accurate, and complete.
- 4. I further certify that I have not violated any term in my TCEQ STEERS participation agreement and that I have no reason to believe that the confidentiality or use of my password has been compromised at any time.
- 5. I understand that use of my password constitutes an electronic signature legally equivalent to my written signature.
- 6. I also understand that the attestations of fact contained herein pertain to the implementation, oversight and enforcement of a state and/or federal environmental program and must be true and complete to the best of my knowledge.
- 7. I am aware that criminal penalties may be imposed for statements or omissions that I know or have reason to believe are untrue or misleading.
- 8. I am knowingly and intentionally signing Title V Existing 2221.
- 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:	2025-02-24
Signature Hash:	47028DDAF3697FA5C70F77C16A06E50F53CC1EEEEAEF487D89AB53CE34D67B713
Form Hash Code at time of Signature:	775ADDEFD8DD3EB48B30580AD830AF356907B8EB7EBB912C8E5156052DEE2077

Submission

Reference Number:	The application reference number is 762600
Submitted by:	The application was submitted by ER028176/Fran Q Falcon
Submitted Timestamp:	The application was submitted on 2025-02-24 at 20:51:46 CST
Submitted From:	The application was submitted from IP address 170.85.99.3
Confirmation Number:	The confirmation number is 633350
Steers Version:	The STEERS version is 6.87
Permit Number:	The permit number is 2221

Additional Information

Application Creator: This account was created by Crystal Schmidt

**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
February 24, 2025	O2221	RN100225945

Unit ID No.	Registration No.	PBR No.	Registration Date
B17PEFU01	157525	106.262	07/12/2019
B13PGFU1	123137	106.262	09/15/2014
B13OL601 B13BH601	124588	106.262	11/24/2014
B13PGFU1	134008	106.262	08/21/2015
B13WJMA01	144226	106.262	12/15/2016 05/22/2018
B13SCPOLY B13PGST662 B13PGST670 B13PGST243 B13PGRX1	152066	106.262	07/11/2018
B13PGFU1	152733	106.261 106.262	08/16/2018
B13PGFU1	153856	106.261 106.262	11/05/2018
B13PGFU1 B43IPFU1	156462	106.262	05/17/2019
B13PGFU1 B13PTD2T	157242	106.262	08/06/2019 09/28/2020
B13PGFU1	158135	106.261 106.262	09/10/2019

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

Date	Permit Number	Regulated Entity Number
February 24, 2025	O2221	RN100225945

Unit ID No.	Registration No.	PBR No.	Registration Date
B43IPST130	159782	106.261 106.262	02/20/2020
B43IPFU1	160340	106.262	03/27/2020
B13PGML43 B13PGFAP67 B13PGFAP26	160643	106.262	05/14/2020
B13PGST202 B13PGST205	162153	106.261 106.262	08/25/2020
B13PGSP22	164720	106.261	05/11/2021
B13PGST226 B13PGST256	165980	106.262	08/24/2021
B39GMFU1	106612	106.261 106.262	01/17/2013
B39GMFU1	115993	106.261 106.262	03/05/2014
B39GMFU1	121638	106.262	08/04/2014
B39GMFU1 B39GMLR2 B39GMST264 B39GMST70A B39GMST70B	B39GMST75A B39GMST75B B39GMST801 B39GMVH290 B39GMWT257 123961	106.261 106.262	10/31/2014
B39GMFU1	151705	106.262	05/21/2018

**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
February 24, 2025	O2221	RN100225945

Unit ID No.	Registration No.	PBR No.	Registration Date
B39GMFU1 B39GMFU3	153454	106.261 106.262	10/26/2018
B39GMFU1 B39GMVH290	156122	106.262	04/16/2019
B39GMFU1	156047	106.261 106.262	04/25/2019
B39GMFU1	160836	106.262	04/21/2020
B39GMFU1	161122	106.261 106.262	05/13/2020
B39GMFU1	163567	106.262	01/02/2021
B39GMFU3	149152	106.262	12/13/2017
B39GMST801	152933	106.262	08/16/2018
B13PGST222	168074	106.262	04/18/2022
B39GMFU1	164874	106.262	05/27/2021
B39GMFU1	175271	106.261 106.262	02/02/2024
B17PEFU01	169380	106.262	06/17/2022

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

Date	Permit Number	Regulated Entity Number
February 24, 2025	O2221	RN100225945

Unit ID No.	Registration No.	PBR No.	Registration Date
B13PGST243 B13PGR5 B13PGST622 B13PGML43 B13PGFAP67 B13PGFA26	168130	106.262	03/25/2022
B17PEFU01 B17PELR1	177535	106.261 106.262	<i>10/08/2024</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
February 24, 2025	O2221	RN100225945

Unit ID No.	PBR No.	Version No./Date
PROGMA PROIPG PROPGA PROPGE	106.263	11/01/2001
B13PGST226	106.472	09/04/2000
B43IPST117	106.478	09/04/2000
B13PGST670	106.478	09/04/2000
B13PGST506 B13PGST508	106.472 106.478	09/04/2000 09/04/2000
B13PGFU1	106.373	09/04/2000
B43IPST170	106.478	09/04/2000
B43IPST171	106.478	09/04/2000
B13PGFU1	106.373	09/04/2000

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

Date	Permit Number	Regulated Entity Number
February 24, 2025	O2221	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
February 24, 2025	O2221	RN100225945

Unit ID No.	PBR No.	Version No./Date Or Registration No.	Monitoring Requirement
B17PEFU01	106.262	157525	New piping components are managed in accordance with the current Leak Detection and Repair (LDAR) fugitive monitoring program (28VHP, 28CNTQ, and AVO) as required by NSR 75721 SCs 5-8 (Permit Issue Date 01/17/2017).
B13PGFU1	106.262	123137	New piping components are managed in accordance with the current Leak Detection and Repair (LDAR) fugitive monitoring programs (28MID) as required by NSR 18561 SC 6 (Permit Issue Date 09/10/2019).
B13OL601 B13BH601	106.262	124588	Maintain records of loading rack annual throughput.
B13PGFU1	106.262	134008	New piping components are managed in accordance with the current Leak Detection and Repair (LDAR) fugitive monitoring programs (28MID) as required by NSR 18561 SC 6 (Permit Issue Date 09/10/2019).
B13WJMA01	106.262	144226	New piping components are managed in accordance with the current Leak Detection and Repair (LDAR) fugitive monitoring programs (28MID) as required by NSR 18561 SC 6 (Permit Issue Date 09/10/2019).
B13SCPOLY B13PGST662 B13PGST670	B13PGST243 B13PGRX1 106.262	152066	New piping components are managed in accordance with the current Leak Detection and Repair (LDAR) fugitive monitoring programs (28MID) as required by NSR 18561 SC 6 (Permit Issue Date 09/10/2019).
B13PGFU1	106.261 106.262	152733	New piping components are managed in accordance with the current Leak Detection and Repair (LDAR) fugitive monitoring programs (28MID) as required by NSR 18561 SC 6 (Permit Issue Date 09/10/2019).
B13PGFU1	106.261 106.262	153856	New piping components are managed in accordance with the current Leak Detection and Repair (LDAR) fugitive monitoring programs (28MID) as required by NSR 18561 SC 6 (Permit Issue Date 09/10/2019).

**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
February 24, 2025	O2221	RN100225945

Unit ID No.	PBR No.	Version No./Date Or Registration No.	Monitoring Requirement
B13PGFU1 B43IPFU1	106.262	156462	New piping components are managed in accordance with the current Leak Detection and Repair (LDAR) fugitive monitoring programs (28MID) as required by NSR 18561 SC 6 (Permit Issue Date 09/10/2019).
B13PGFU1 B13PTD2T	106.262	157242	New piping components are managed in accordance with the current Leak Detection and Repair (LDAR) fugitive monitoring programs (28MID) as required by NSR 18561 SC 6 (Permit Issue Date 09/10/2019).
B13PGFU1	106.261 106.262	158135	New piping components are managed in accordance with the current Leak Detection and Repair (LDAR) fugitive monitoring programs 28MID.
B43IPST130	106.261 106.262	159782	Maintain records of tank service and annual throughput.
B43IPFU1	106.262	160340	New piping components are managed in accordance with the current Leak Detection and Repair (LDAR) fugitive monitoring programs 28MID.
B13PGML43 B13PGFAP67 B13PGFAP26	106.262	160643	Maintain records of loading rack annual throughput.
B13PGST202 B13PGST205	106.261 106.262	162153	Maintain records of tank service and annual throughput.
B13PGSP22	106.261	164720	New piping components are managed in accordance with the current Leak Detection and Repair (LDAR) fugitive monitoring programs 28MID.
B13PGST226 B13PGST256	106.262	165980	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
February 24, 2025	O2221	RN100225945

Unit ID No.		PBR No.	Version No./Date Or Registration No.	Monitoring Requirement
B39GMFU1		106.261 106.262	106612	New piping components are managed in accordance with the current Leak Detection and Repair (LDAR) fugitive monitoring program (28MID, 28CNTQ, 28PI and AVO) as required by NSR 104144 SC 13 (Permit Issue Date 02/08/2023).
B39GMFU1		106.261 106.262	115993	New piping components are managed in accordance with the current Leak Detection and Repair (LDAR) fugitive monitoring program (28MID, 28CNTQ, 28PI and AVO) as required by NSR 104144 SC 13 (Permit Issue Date 02/08/2023).
B39GMFU1		106.262	121638	New piping components are managed in accordance with the current Leak Detection and Repair (LDAR) fugitive monitoring program (28MID, 28CNTQ, 28PI and AVO) as required by NSR 104144 SC 13 (Permit Issue Date 02/08/2023).
B39GMFU1 B39GMLR2 B39GMST264 B39GMST70A B39GMST70B	B39GMST75A B39GMST75B B39GMST801 B39GMVH290 B39GMWT257	106.261 106.262	123961	New piping components are managed in accordance with the current Leak Detection and Repair (LDAR) fugitive monitoring program (28MID, 28CNTQ, 28PI and AVO) as required by NSR 104144 SC 13 (Permit Issue Date 02/08/2023).  Maintain records of tank service and annual throughput.  Maintain records of loading rack annual throughput.
B39GMFU1		106.262	151705	New piping components are managed in accordance with the current Leak Detection and Repair (LDAR) fugitive monitoring program (28MID, 28CNTQ, 28PI and AVO) as required by NSR 104144 SC 13 (Permit Issue Date 02/08/2023).
B39GMFU1 B39GMFU3		106.261 106.262	153454	New piping components are managed in accordance with the current Leak Detection and Repair (LDAR) fugitive monitoring program (28MID, 28CNTQ, 28PI and AVO) as required by NSR 104144 SC 13 (Permit Issue Date 02/08/2023).
B39GMFU1 B39GMVH290		106.262	156122	New piping components are managed in accordance with the current Leak Detection and Repair (LDAR) fugitive monitoring program (28MID, 28CNTQ, 28PI and AVO) as required by NSR 104144 SC 13 (Permit Issue Date 02/08/2023).

**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
February 24, 2025	O2221	RN100225945

Unit ID No.	PBR No.	Version No./Date Or Registration No.	Monitoring Requirement
B39GMFU1	106.261 106.262	156047	New piping components are managed in accordance with the current Leak Detection and Repair (LDAR) fugitive monitoring program (28MID, 28CNTQ, 28PI and AVO) as required by NSR 104144 SC 13 (Permit Issue Date 02/08/2023).
B39GMFU1	106.262	160836	New piping components are managed in accordance with the current Leak Detection and Repair (LDAR) fugitive monitoring program (28MID, 28CNTQ, 28PI and AVO) as required by NSR 104144 SC 13 (Permit Issue Date 02/08/2023).
B39GMFU1	106.261 106.262	161122	New piping components are managed in accordance with the current Leak Detection and Repair (LDAR) fugitive monitoring program (28MID, 28CNTQ, 28PI and AVO) as required by NSR 104144 SC 13 (Permit Issue Date 02/08/2023).
B39GMFU1	106.262	163567	New piping components are managed in accordance with the current Leak Detection and Repair (LDAR) fugitive monitoring program (28MID, 28CNTQ, 28PI and AVO) as required by NSR 104144 SC 13 (Permit Issue Date 02/08/2023).
B39GMFU3	106.262	149152	New piping components are managed in accordance with the current Leak Detection and Repair (LDAR) fugitive monitoring program (28MID, 28CNTQ, 28PI and AVO) as required by NSR 104144 SC 13 (Permit Issue Date 02/08/2023).
B39GMST801	106.262	152933	Maintain records of tank service and annual throughput.
PROGMA PROIPG PROPGA PROPGE	106.263	11/01/2003	Track emissions on a rolling 12-month basis.
B13PGST1226	106.472	09/04/2000	Maintain records of tank service and annual throughput.
B43IPST117	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
February 24, 2025	O2221	RN100225945

Unit ID No.	PBR No.	Version No./Date Or Registration No.	Monitoring Requirement
B13PGST670	106.478	09/04/2000	Maintain records of tank service and annual throughput.
B13PGST506 B13PGST508	106.472 106.478	09/04/2000	Maintain records of tank service and annual throughput.
B13PGFU1	106.373	09/04/2000	Maintain records of additions to refrigeration system.
B43IPST170	106.478	09/04/2000	Maintain records of tank service and annual throughput.
B43IPST171	106.478	09/04/2000	Maintain records of tank service and annual throughput.
B13PGFU1	106.373	09/04/2000	Maintain records of refrigerant addition.
B39GMFU1	106.262	164874	New piping components are managed in accordance with the current Leak Detection and Repair (LDAR) fugitive monitoring program (28MID, 28CNTQ, 28PI and AVO) as required by NSR 104144 SC 13 (Permit Issue Date 02/08/2023).
B39GMFU1	106.261 106.262	175271	New piping components are managed in accordance with the current Leak Detection and Repair (LDAR) fugitive monitoring program (28MID, 28CNTQ, 28PI and AVO) as required by NSR 104144 SC 13 (Permit Issue Date 02/08/2023).
B17PEFU01	106.262	169380	New piping components are managed in accordance with the current Leak Detection and Repair (LDAR) fugitive monitoring program (28VHP, 28CNTQ, and AVO) as required by NSR 75721 SCs 5-8 (Permit Issue Date 01/17/2017).

**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
February 24, 2025	O2221	RN100225945

Unit ID No.	PBR No.	Version No./Date Or Registration No.	Monitoring Requirement
B13PGST243 B13PGR5 B13PGST622 B13PGML43 B13PGFAP67 B13PGFA26	106.262	168130	Tanks will continue to meet the monitoring and recordkeeping requirements of NSR 18561 SC 8 and SC 9 (permit issue date 09/10/2019) for tank service and annual throughput.  Scrubber will continue to meet the requirements of NSR 18561 SC 22 (permit issue date 9/10/2019).  Maintain records of magsil addition.  Maintain records of filter-aid addition.
B17PEFU01 B17PELR1	106.261 106.262	177535	New piping components are managed in accordance with the current Leak Detection and Repair (LDAR) fugitive monitoring program (28VHP, 28CNTQ, and AVO) as required by NSR 75721 SCs 5-8 (Permit Issue Date 01/17/2017).  Maintain records of annual throughput.

**From:** Carolyn Maus  
**Sent:** Monday, February 24, 2025 2:16 PM  
**To:** Schmidt, Crystal (C)  
**Subject:** RE: Working Draft Permit Review -- FOP O2221/Project 37167, The Dow Chemical Company/Dow Texas Operations Freeport

Hi Crystal,

No problem – I know you have multiple permits to keep track of on your end just like we do. I will keep an eye out for the STEERS submittal.

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



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---

**From:** Schmidt, Crystal (C) <[cschmidt6@dow.com](mailto:cschmidt6@dow.com)>  
**Sent:** Monday, February 24, 2025 1:30 PM  
**To:** Carolyn Maus <[carolyn.maus@tceq.texas.gov](mailto:carolyn.maus@tceq.texas.gov)>  
**Subject:** RE: Working Draft Permit Review -- FOP O2221/Project 37167, The Dow Chemical Company/Dow Texas Operations Freeport

My apologies, I sure did miss that request. I just uploaded the form into STEERS, and the DAR should sign today. Thanks!

*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

**From:** Carolyn Maus <[carolyn.maus@tceq.texas.gov](mailto:carolyn.maus@tceq.texas.gov)>  
**Sent:** Friday, February 21, 2025 12:08 PM  
**To:** Schmidt, Crystal (C) <[cschmidt6@dow.com](mailto:cschmidt6@dow.com)>  
**Subject:** RE: Working Draft Permit Review -- FOP 02221/Project 37167, The Dow Chemical Company/Dow Texas Operations Freeport

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

Hi Crystal,

Apologies for not getting back to you right away. I got the OP-CRO1 in STEERS and I will get this project ready for public announcement. However, I still need the updated OP-PBRSUP that I mentioned in my WDP email. I may not have made that request stand out visually enough in the email, so I've excerpted that portion here. If you could update the form and upload in STEERS by **2/28/2025**, that would be great.

*I will need another updated OP-PBRSUP, since Registration No. 177535 is no longer pending (issued 10/08/2024). Please add the registration date to Table A and remove the footnote from Tables A and D. Re-date all four tables and re-submit as a set.*

Thank you!

Sincerely,

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



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## Texas Commission on Environmental Quality

Title V Existing

2221

### Site Information (Regulated Entity)

What is the name of the permit area to be authorized?	SPECIALTY CHEMICALS 2
Does the site have a physical address?	Yes
Physical Address	
Number and Street	2301 N BRAZOSPORT BLVD
City	FREEPORT
State	TX
ZIP	77541
County	BRAZORIA
Latitude (N) (##.#####)	28.9825
Longitude (W) (-###.#####)	95.352777
Primary SIC Code	2869
Secondary SIC Code	
Primary NAICS Code	325199
Secondary NAICS Code	
Regulated Entity Site Information	
What is the Regulated Entity's Number (RN)?	RN100225945
What is the name of the Regulated Entity (RE)?	DOW TEXAS OPERATIONS FREEPORT
Does the RE site have a physical address?	Yes
Physical Address	
Number and Street	2301 N BRAZOSPORT BLVD
City	FREEPORT
State	TX
ZIP	77541
County	BRAZORIA
Latitude (N) (##.#####)	28.9825
Longitude (W) (-###.#####)	-95.352777
Facility NAICS Code	
What is the primary business of this entity?	INDUSTRIAL CHEMICAL MANUFACTURING PLANT

### Customer (Applicant) Information

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

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

## Responsible Official Contact

Person TCEQ should contact for questions about this application:

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

## Duly Authorized Representative Contact

Person TCEQ should contact for questions about this application

Select existing DAR contact or enter a new contact.

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

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

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

4093925054

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?

Update

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

2221-37167

5) Who will electronically sign this Title V application?

Duly Authorized Representative

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

No

## Title V Attachments Existing

---

Attach OP-1 (Site Information Summary)

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

Attach OP-ACPS (Application Compliance Plan and Schedule)

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

Attach OP-REQ2 (Negative Applicable Requirement Determinations)

Attach OP-REQ3 (Applicable Requirements Summary)

Attach OP-PBRSUP (Permits by Rule Supplemental Table)

Attach OP-SUMR (Individual Unit Summary for Revisions)

Attach OP-MON (Monitoring Requirements)

Attach OP-UA (Unit Attribute) Forms

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

Attach OP-CRO2 (Change of Responsible Official Information)

Attach OP-DEL (Delegation of Responsible Official)

Attach Void Request Form

Attach any other necessary information needed to complete the permit.

[File Properties]

File Name

<a href=/ePermitsExternal/faces/file?fileId=239683>O2221\_Form\_OP-CRO1.pdf</a>

Hash

CD83897473444419B95C8EDA7C342CB02C7F27A4721E56099EA7ACC5F1C2B853

MIME-Type

application/pdf

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

## Certification

---

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

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

- 3. I have personally examined the foregoing and am familiar with its content and the content of any attachments, and based upon my personal knowledge and/or inquiry of any individual responsible for information contained herein, that this information is true, accurate, and complete.
- 4. I further certify that I have not violated any term in my TCEQ STEERS participation agreement and that I have no reason to believe that the confidentiality or use of my password has been compromised at any time.
- 5. I understand that use of my password constitutes an electronic signature legally equivalent to my written signature.
- 6. I also understand that the attestations of fact contained herein pertain to the implementation, oversight and enforcement of a state and/or federal environmental program and must be true and complete to the best of my knowledge.
- 7. I am aware that criminal penalties may be imposed for statements or omissions that I know or have reason to believe are untrue or misleading.
- 8. I am knowingly and intentionally signing Title V Existing 2221.
- 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:	2025-02-10
Signature Hash:	47028DDAF3697FA5C70F77C16A06E50F53CC1EEEEAEF487D89AB53CE34D67B713
Form Hash Code at time of Signature:	EC06292127DB55A3AE83B6AB9521810011D0FCB57F2FE7F102ADDD472E7BBEFB

Submission

Reference Number:	The application reference number is 755100
Submitted by:	The application was submitted by ER028176/Fran Q Falcon
Submitted Timestamp:	The application was submitted on 2025-02-10 at 07:43:43 CST
Submitted From:	The application was submitted from IP address 170.85.99.3
Confirmation Number:	The confirmation number is 627415
Steers Version:	The STEERS version is 6.86
Permit Number:	The permit number is 2221

Additional Information

Application Creator: This account was created by Crystal Schmidt

**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>O2221</b>
Project No.: <b>37167</b>
Area Name: <b>Specialty Chemicals 2</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.

**IV. Certification of Truth**

**This certification does not extend to information which is designated by TCEQ as information for reference only.**

I, Fran Quinlan Falcon certify that I am the DAR

*(Certifier Name printed or typed)*

*(RO or DAR)*

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:

*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).*

Time Period: From September 19, 2024 to February 10, 2025

*(Start Date)*

*(End Date)*

Specific Dates: \_\_\_\_\_

*(Date 1)*

*(Date 2)*

*(Date 3)*

*(Date 4)*

\_\_\_\_\_  
*(Date 5)*

*(Date 6)*

Signature: \_\_\_\_\_ Signature Date: February 10, 2025 Title:

Title: Texas Regional Environmental Leader

**From:** Schmidt, Crystal (C) <cschmidt6@dow.com>  
**Sent:** Thursday, February 6, 2025 3:57 PM  
**To:** Carolyn Maus  
**Subject:** RE: Working Draft Permit Review -- FOP O2221/Project 37167, The Dow Chemical Company/Dow Texas Operations Freeport

Carolyn,

Dow has no comments on this Working Draft Permit. I will work on getting you an OP-CRO1 via STEERS. Thanks!

*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)



Seek Together™

General Business

---

**From:** Carolyn Maus <[carolyn.maus@tceq.texas.gov](mailto:carolyn.maus@tceq.texas.gov)>  
**Sent:** Thursday, February 6, 2025 10:03 AM  
**To:** Schmidt, Crystal (C) <[cschmidt6@dow.com](mailto:cschmidt6@dow.com)>  
**Subject:** Working Draft Permit Review -- FOP O2221/Project 37167, The Dow Chemical Company/Dow Texas Operations Freeport

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

Good afternoon, Crystal,

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



- 1) Added transfer rack B17PELR1 with Chapter 115 and MACT G requirements.
- 2) Updated preconstruction authorizations to include new PBR registrations since last project. This was for units B13PGR5, B13PGST243, B17PEFU01, B17PELR1, and B39GMFU1.
- 3) Updated the date and project number reference in Special Term and Condition 17 to account for latest OP-PBR SUP submittal.

Please review the WDP and submit to me any comments you have on the working draft permit by **Monday, February 24, 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, I will need another updated OP-PBR SUP, since Registration No. 177535 is no longer pending (issued 10/08/2024). Please add the registration date to Table A and remove the footnote from Tables A and D. Re-date all four tables and re-submit as a set. **Please provide this with your WDP comments.**

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,

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



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**From:** Carolyn Maus  
**Sent:** Tuesday, November 5, 2024 9:54 AM  
**To:** Schmidt, Crystal (C)  
**Subject:** Technical Review -- FOP O2221/Project 37167, The Dow Chemical Company/Dow Texas Operations Freeport

Good morning,

I have been assigned to the Federal Operating Permit (FOP) revision application of Permit No. O2221 for The Dow Chemical Company, Dow Texas Operations Freeport, Specialty Chemicals 2. This application has been assigned Project No. 37167. Please address all correspondence pertaining to this permit application, including any updates, to me at the address in my email signature, and use both the Permit and Project reference numbers above to facilitate tracking. I have begun technical review of this application and will request any updated forms or additional information from you if needed.

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.

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](#).**

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,

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



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at [www.tceq.texas.gov/customersurvey](http://www.tceq.texas.gov/customersurvey)

## Texas Commission on Environmental Quality

Title V Existing

2221

### Site Information (Regulated Entity)

What is the name of the permit area to be authorized?	SPECIALTY CHEMICALS 2
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 (###-###-####)

9792389877

Extension

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

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

9792358116

E-mail

txles@dow.com

## Duly Authorized Representative Contact

Person TCEQ should contact for questions about this application

Select existing DAR contact or enter a new contact.

FRAN FALCON(THE DOW CHEMICA... )

Organization Name

THE DOW CHEMICAL COMPANY

Prefix

MS

First

FRAN

Middle

Last

FALCON

Suffix

Credentials

Title

EH&S REGIONAL LEVERAGED DELIVERY DIRECTOR

Enter new address or copy one from list

Mailing Address

Address Type

Domestic

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

2301 N BRAZOSPORT BLVD

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

BLDG B-101

City

FREEPORT

State

TX

Zip

77541

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

9792389764

Extension

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

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

9792380317

E-mail

FQFalcon@dow.com

## Technical Contact

Person TCEQ should contact for questions about this application:

Select existing TC contact or enter a new contact.

Organization Name

Prefix

First

Middle

Last

Suffix

Credentials

Title

Enter new address or copy one from list:

Mailing Address

Address Type

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

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

City

State

ZIP

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

Extension

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

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

E-mail

CRYSTAL SCHMIDT(THE DOW CHEMICA... )

THE DOW CHEMICAL COMPANY

MRS

CRYSTAL

SCHMIDT

AIR PERMIT MANAGER

Domestic

332 HIGHWAY 332 E

LAKE JACKSON

TX

77566

4093925054

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 through permit conversion?

No

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

No

5) Who will electronically sign this Title V application?

Duly Authorized Representative



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

No

## Title V Attachments Existing

Attach OP-1 (Site Information Summary)

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

[File Properties]

File Name

[OP\\_2\\_Form\\_OP-2.pdf](/ePermitsExternal/faces/file?fileId=217573)

Hash

E018C1733F81BF70B9C0AE3755CBBC698A928A0E7054567407BA64517062A3BE

MIME-Type

application/pdf

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

Attach OP-REQ2 (Negative Applicable Requirement Determinations)

Attach OP-REQ3 (Applicable Requirements Summary)

[File Properties]

File Name

[OP\\_REQ3\\_Form\\_OP-REQ3.pdf](/ePermitsExternal/faces/file?fileId=217574)

Hash

729ABD98859A30CDFB7AD886890D7B590A99B790D1AF739D8C98BD34B6041B3E

MIME-Type

application/pdf

Attach OP-PBR SUP (Permits by Rule Supplemental Table)

[File Properties]

File Name

[OP\\_PBR SUP\\_Form\\_OP-PBR SUP.pdf](/ePermitsExternal/faces/file?fileId=217575)

Hash

DF83DF3D8E6F1EC96DDD50B7BBEC2DF584D8C072066377C19C54CDF8E91E99E9

MIME-Type

application/pdf

Attach OP-SUMR (Individual Unit Summary for Revisions)

[File Properties]

File Name

[OP\\_SUMR\\_Form\\_OP-SUMR.pdf](/ePermitsExternal/faces/file?fileId=217576)

Hash

3C8240D7C07ACF345829C895C2D641C9E7D2C2F19124F7FDB767593696BCCCAC

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=217577>Form\_OP-UAs.pdf</a>

Hash

56117170B6937A4DD11AABF4EB9C26632A6636990B80CB5F6D553252039FCC1B

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=217578>Cover\_Letter.pdf</a>

Hash

437C26C59D71DC13E996DAF8615A054F496F554D442A7BF235DBA1DEB63D854B

MIME-Type

application/pdf

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

## Expedite Title V

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

No

## Certification

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

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

- 3. I have personally examined the foregoing and am familiar with its content and the content of any attachments, and based upon my personal knowledge and/or inquiry of any individual responsible for information contained herein, that this information is true, accurate, and complete.
- 4. I further certify that I have not violated any term in my TCEQ STEERS participation agreement and that I have no reason to believe that the confidentiality or use of my password has been compromised at any time.
- 5. I understand that use of my password constitutes an electronic signature legally equivalent to my written signature.
- 6. I also understand that the attestations of fact contained herein pertain to the implementation, oversight and enforcement of a state and/or federal environmental program and must be true and complete to the best of my knowledge.
- 7. I am aware that criminal penalties may be imposed for statements or omissions that I know or have reason to believe are untrue or misleading.
- 8. I am knowingly and intentionally signing Title V Existing 2221.
- 9. My signature indicates that I am in agreement with the information on this form, and authorize its submittal to the TCEQ.

OWNER OPERATOR Signature: Fran Q Falcon OWNER OPERATOR

Account Number:	ER028176
Signature IP Address:	165.225.58.8
Signature Date:	2024-09-19
Signature Hash:	4725663576DE3F41DE74D82CB21CFB9BFB69E4422881212DCE899ECE17426B81
Form Hash Code at time of Signature:	22B1DC5657B636033F278C7F003FB53906B3D8CA0A0F791736D4CB6AA70841DB

Submission

Reference Number:	The application reference number is 684714
Submitted by:	The application was submitted by ER028176/Fran Q Falcon
Submitted Timestamp:	The application was submitted on 2024-09-19 at 13:29:49 CDT
Submitted From:	The application was submitted from IP address 165.225.58.8
Confirmation Number:	The confirmation number is 564771
Steers Version:	The STEERS version is 6.82
Permit Number:	The permit number is 2221

Additional Information

Application Creator: This account was created by Crystal Schmidt



September 19, 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**  
**Specialty Chemicals 2 – Title V Operating Permit O2221**  
**Permit Minor Revision Application**

Dear Mr. Bowers,

The Dow Chemical Company is submitting the Title V Operating Permit O2221 Minor Revision Application for the Specialty Chemicals 2 facility located in Brazoria County, Texas in accordance with 30 TAC Chapter 122, Subchapter, C §122.215, §122.216, and §122.217.

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

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

Date: <b>September 19, 2024</b>	
Permit No.: <b>O2221</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

**Texas Commission on Environmental Quality  
Federal Operating Permit Program  
Form OP-2 – Application for Permit Revision/Renewal  
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)?						<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO <input type="checkbox"/> N/A
<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.						

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

<b>Date:</b>	September 19, 2024					
<b>Permit No.:</b>	O2221					
<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	B17PELR1	OP-SUMR OP-UA4	N/A	Please add this transfer rack to this Title V Permit.  Please add 30 TAC Chapter 115, Loading and Unloading of VOC and 40 CFR Part 63, Subpart G positive applicability to this transfer rack.
2	MS-C	NO	B13PGR5 B13PGST243 B17PEFU01 B17PELR1 B39GMFU1	OP-PBRSUP	N/A	Please update the PBR Supplemental Table to include any changes that have been made since the permit was last revised in May 2024 (Project #34826).  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  
Individual Unit Summary for Revisions  
Form OP-SUMR  
Table 1**

Date	Permit No.	Regulated Entity No.
September 19, 2024	O2221	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
	2	B13PGR5	OP-UA15 OP-UA60	KR-5 REACTOR		18561 <i>106.262/11/01/2003 [168130]</i>	
	2	B13PGST243	OP-UA15	D-1243 PROCESS TANK		18561 106.262/11/01/2003 [152066, <i>168130]</i>	
	2	B17PEFU01	OP-UA12	PGE FUGITIVES		75751 <i>106.261/11/01/2003 [177535*]</i> 106.262/11/01/2003 [157525, <i>169380, 177535*]</i>	
A	1	<i>B17PELR1</i>	<i>OP-UA4</i>	<i>RERUN LOADING</i>		<i>106.261/11/01/2003 [177535*]</i> <i>106.262/11/01/2003 [177535*]</i>	
	2	B39GMFU1	OP-UA12	REACTOR AREA FUGITIVE, GMA EQUIPMENT		104144 106.261/11/01/2003 [106612, 123961, 115993, 153454, 156047, 161122, <i>175271]</i> 106.262/11/01/2003 [106612, 123961, 115993, 121638, 151705, 153454, 156122, 156047, 160836, 161122, 163567, <i>164874, 175271]</i>	

**\*This PBR Registration is currently pending with TCEQ (Project #379753). This PBR package (106.261/11/01/2003 and 106.262/11/01/2003) was received by TCEQ on September 13, 2024.**



**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.
September 19, 2024	O2221	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>B17PELR1</i>	<i>R5211-01</i>	<i>OTHER</i>	<i>213B</i>		<i>VOC1</i>	<i>BOTH</i>	<i>0.5-</i>		

**Loading/Unloading Operations Attributes – Form OP-UA4 (Page 9)**  
**Federal Operating Permit Program**

**Table 7a: Title 40 Code of Federal Regulations Part 63 (40 CFR Part 63)**

**Subpart G: National Emission Standards for Organic Hazardous Air Pollutants from the Synthetic Organic Chemical Manufacturing Industry for Transfer Operations**

Date	Permit No.	Regulated Entity No.
September 19, 2024	O2221	RN100225945

Unit ID No.	SOP Index No.	Transfer Rack Type	Subject to Subpart BB	Compliance Options	Closed Vent System	Hard Piping
<i>B17PELR1</i>	<i>63G-01</i>	<i>GRP2</i>	<i>NO</i>			

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

<b>Date:</b> September 19, 2024	<b>Regulated Entity No.:</b> RN100225945	<b>Permit No.:</b> O2221
<b>Company Name:</b> The Dow Chemical Company	<b>Area Name:</b> Specialty Chemicals 2	

Revision No.	Unit/Group/Process		SOP/GOP Index No.	Pollutant	Applicable Regulatory Requirement	
	ID No.	Applicable Form			Name	Standard(s)
1	<i>B17PELR1</i>	<i>OP-UA4</i>	<i>R5211-01</i>	<i>VOC</i>	<i>30 TAC Chapter 115, Loading and Unloading of VOC</i>	<i>115.217(a)(1), 115.212(a)(2), 115.214(a)(1)(B), 115.214(a)(1)(D), (a)(1)(D)(i)</i>
1	<i>B17PELR1</i>	<i>OP-UA4</i>	<i>63G-01</i>	<i>HAPS</i>	<i>40 CFR Part 63, Subpart G</i>	<i>63.126(c)</i>

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

<b>Date:</b> September 19, 2024	<b>Regulated Entity No.:</b> RN100225945	<b>Permit No.:</b> O2221
<b>Company Name:</b> The Dow Chemical Company	<b>Area Name:</b> Specialty Chemicals 2	

Revision No.	Unit/Group/Process ID No.	SOP/GOP Index No.	Pollutant	Monitoring and Testing Requirements	Recordkeeping Requirements	Reporting Requirements
1	<i>B17PELR1</i>	<i>R5211-01</i>	<i>VOC</i>	<i>115.214(a)(1)(A), (a)(1)(A)(i), 115.215, (4)</i>	<i>115.216, (2), (3)(B)</i>	<i>NONE</i>
1	<i>B17PELR1</i>	<i>63G-01</i>	<i>HAPS</i>	<i>NONE</i>	<i>63.130(f), (f)(1)-(3), (f)(3)(i)-(ii)</i>	<i>63.152(c)(4)(iii)</i>

**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 19, 2024	O2221	RN100225945

Unit ID No.	Registration No.	PBR No.	Registration Date
B17PEFU01	157525	106.262	07/12/2019
B13PGFU1	123137	106.262	09/15/2014
B13OL601 B13BH601	124588	106.262	11/24/2014
B13PGFU1	134008	106.262	08/21/2015
B13WJMA01	144226	106.262	12/15/2016 05/22/2018
B13SCPOLY B13PGST662 B13PGST670 B13PGST243 B13PGRX1	152066	106.262	07/11/2018
B13PGFU1	152733	106.261 106.262	08/16/2018
B13PGFU1	153856	106.261 106.262	11/05/2018
B13PGFU1 B43IPFU1	156462	106.262	05/17/2019
B13PGFU1 B13PTD2T	157242	106.262	08/06/2019 09/28/2020
B13PGFU1	158135	106.261 106.262	09/10/2019

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

Date	Permit Number	Regulated Entity Number
September 19, 2024	O2221	RN100225945

Unit ID No.	Registration No.	PBR No.	Registration Date
B43IPST130	159782	106.261 106.262	02/20/2020
B43IPFU1	160340	106.262	03/27/2020
B13PGML43 B13PGFAP67 B13PGFAP26	160643	106.262	05/14/2020
B13PGST202 B13PGST205	162153	106.261 106.262	08/25/2020
B13PGSP22	164720	106.261	05/11/2021
B13PGST226 B13PGST256	165980	106.262	08/24/2021
B39GMFU1	106612	106.261 106.262	01/17/2013
B39GMFU1	115993	106.261 106.262	03/05/2014
B39GMFU1	121638	106.262	08/04/2014
B39GMFU1 B39GMLR2 B39GMST264 B39GMST70A B39GMST70B	B39GMST75A B39GMST75B B39GMST801 B39GMVH290 B39GMWT257 123961	106.261 106.262	10/31/2014
B39GMFU1	151705	106.262	05/21/2018

**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 19, 2024	O2221	RN100225945

Unit ID No.	Registration No.	PBR No.	Registration Date
B39GMFU1 B39GMFU3	153454	106.261 106.262	10/26/2018
B39GMFU1 B39GMVH290	156122	106.262	04/16/2019
B39GMFU1	156047	106.261 106.262	04/25/2019
B39GMFU1	160836	106.262	04/21/2020
B39GMFU1	161122	106.261 106.262	05/13/2020
B39GMFU1	163567	106.262	01/02/2021
B39GMFU3	149152	106.262	12/13/2017
B39GMST801	152933	106.262	08/16/2018
B13PGST222	168074	106.262	04/18/2022
<b><i>B39GMFU1</i></b>	<b><i>164874</i></b>	<b><i>106.262</i></b>	<b><i>05/27/2021</i></b>
<b><i>B39GMFU1</i></b>	<b><i>175271</i></b>	<b><i>106.261</i></b> <b><i>106.262</i></b>	<b><i>02/02/2024</i></b>
<b><i>B17PEFU01</i></b>	<b><i>169380</i></b>	<b><i>106.262</i></b>	<b><i>06/17/2022</i></b>

**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 19, 2024	O2221	RN100225945

Unit ID No.	Registration No.	PBR No.	Registration Date
<i>B13PGST243</i> <i>B13PGR5</i> <i>B13PGST622</i> <i>B13PGML43</i> <i>B13PGFAP67</i> <i>B13PGFA26</i>	<i>168130</i>	<i>106.262</i>	<i>03/25/2022</i>
<i>B17PEFU01</i> <i>B17PELRI</i>	<i>177535</i>	<i>106.261</i> <i>106.262</i>	***

\*\*\*This PBR Registration is currently pending with TCEQ (Project #379753). This PBR package (106.261/11/01/2003 and 106.262/11/01/2003) was received by TCEQ on September 13, 2024.



**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 19, 2024	O2221	RN100225945

Unit ID No.	PBR No.	Version No./Date
PROGMA PROIPG PROPGA PROPGE	106.263	11/01/2001
B13PGST226	106.472	09/04/2000
B43IPST117	106.478	09/04/2000
B13PGST670	106.478	09/04/2000
B13PGST506 B13PGST508	106.472 106.478	09/04/2000 09/04/2000
B13PGFU1	106.373	09/04/2000
B43IPST170	106.478	09/04/2000
B43IPST171	106.478	09/04/2000
<b><i>B13PGFU1</i></b>	<b><i>106.373</i></b>	<b><i>09/04/2000</i></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
September 19, 2024	O2221	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
September 19, 2024	O2221	RN100225945

Unit ID No.	PBR No.	Version No./Date Or Registration No.	Monitoring Requirement
B17PEFU01	106.262	157525	New piping components are managed in accordance with the current Leak Detection and Repair (LDAR) fugitive monitoring program (28VHP, 28CNTQ, and AVO) as required by NSR 75721 SCs 5-8 (Permit Issue Date 01/17/2017).
B13PGFU1	106.262	123137	New piping components are managed in accordance with the current Leak Detection and Repair (LDAR) fugitive monitoring programs (28MID) as required by NSR 18561 SC 6 (Permit Issue Date 09/10/2019).
B13OL601 B13BH601	106.262	124588	Maintain records of loading rack annual throughput.
B13PGFU1	106.262	134008	New piping components are managed in accordance with the current Leak Detection and Repair (LDAR) fugitive monitoring programs (28MID) as required by NSR 18561 SC 6 (Permit Issue Date 09/10/2019).
B13WJMA01	106.262	144226	New piping components are managed in accordance with the current Leak Detection and Repair (LDAR) fugitive monitoring programs (28MID) as required by NSR 18561 SC 6 (Permit Issue Date 09/10/2019).
B13SCPOLY B13PGST662 B13PGST670	B13PGST243 B13PGRX1 106.262	152066	New piping components are managed in accordance with the current Leak Detection and Repair (LDAR) fugitive monitoring programs (28MID) as required by NSR 18561 SC 6 (Permit Issue Date 09/10/2019).
B13PGFU1	106.261 106.262	152733	New piping components are managed in accordance with the current Leak Detection and Repair (LDAR) fugitive monitoring programs (28MID) as required by NSR 18561 SC 6 (Permit Issue Date 09/10/2019).
B13PGFU1	106.261 106.262	153856	New piping components are managed in accordance with the current Leak Detection and Repair (LDAR) fugitive monitoring programs (28MID) as required by NSR 18561 SC 6 (Permit Issue Date 09/10/2019).

**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 19, 2024	O2221	RN100225945

Unit ID No.	PBR No.	Version No./Date Or Registration No.	Monitoring Requirement
B13PGFU1 B43IPFU1	106.262	156462	New piping components are managed in accordance with the current Leak Detection and Repair (LDAR) fugitive monitoring programs (28MID) as required by NSR 18561 SC 6 (Permit Issue Date 09/10/2019).
B13PGFU1 B13PTD2T	106.262	157242	New piping components are managed in accordance with the current Leak Detection and Repair (LDAR) fugitive monitoring programs (28MID) as required by NSR 18561 SC 6 (Permit Issue Date 09/10/2019).
B13PGFU1	106.261 106.262	158135	New piping components are managed in accordance with the current Leak Detection and Repair (LDAR) fugitive monitoring programs 28MID.
B43IPST130	106.261 106.262	159782	Maintain records of tank service and annual throughput.
B43IPFU1	106.262	160340	New piping components are managed in accordance with the current Leak Detection and Repair (LDAR) fugitive monitoring programs 28MID.
B13PGML43 B13PGFAP67 B13PGFAP26	106.262	160643	Maintain records of loading rack annual throughput.
B13PGST202 B13PGST205	106.261 106.262	162153	Maintain records of tank service and annual throughput.
B13PGSP22	106.261	164720	New piping components are managed in accordance with the current Leak Detection and Repair (LDAR) fugitive monitoring programs 28MID.
B13PGST226 B13PGST256	106.262	165980	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
September 19, 2024	O2221	RN100225945

Unit ID No.	PBR No.	Version No./Date Or Registration No.	Monitoring Requirement
B39GMFU1	106.261 106.262	106612	New piping components are managed in accordance with the current Leak Detection and Repair (LDAR) fugitive monitoring program (28MID, 28CNTQ, 28PI and AVO) as required by NSR 104144 SC 13 (Permit Issue Date 02/08/2023).
B39GMFU1	106.261 106.262	115993	New piping components are managed in accordance with the current Leak Detection and Repair (LDAR) fugitive monitoring program (28MID, 28CNTQ, 28PI and AVO) as required by NSR 104144 SC 13 (Permit Issue Date 02/08/2023).
B39GMFU1	106.262	121638	New piping components are managed in accordance with the current Leak Detection and Repair (LDAR) fugitive monitoring program (28MID, 28CNTQ, 28PI and AVO) as required by NSR 104144 SC 13 (Permit Issue Date 02/08/2023).
B39GMFU1 B39GMLR2 B39GMST264 B39GMST70A B39GMST70B	B39GMST75A B39GMST75B B39GMST801 B39GMVH290 B39GMWT257	106.261 106.262	123961  New piping components are managed in accordance with the current Leak Detection and Repair (LDAR) fugitive monitoring program (28MID, 28CNTQ, 28PI and AVO) as required by NSR 104144 SC 13 (Permit Issue Date 02/08/2023).  Maintain records of tank service and annual throughput.  Maintain records of loading rack annual throughput.
B39GMFU1	106.262	151705	New piping components are managed in accordance with the current Leak Detection and Repair (LDAR) fugitive monitoring program (28MID, 28CNTQ, 28PI and AVO) as required by NSR 104144 SC 13 (Permit Issue Date 02/08/2023).
B39GMFU1 B39GMFU3	106.261 106.262	153454	New piping components are managed in accordance with the current Leak Detection and Repair (LDAR) fugitive monitoring program (28MID, 28CNTQ, 28PI and AVO) as required by NSR 104144 SC 13 (Permit Issue Date 02/08/2023).
B39GMFU1 B39GMVH290	106.262	156122	New piping components are managed in accordance with the current Leak Detection and Repair (LDAR) fugitive monitoring program (28MID, 28CNTQ, 28PI and AVO) as required by NSR 104144 SC 13 (Permit Issue Date 02/08/2023).

**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 19, 2024	O2221	RN100225945

Unit ID No.	PBR No.	Version No./Date Or Registration No.	Monitoring Requirement
B39GMFU1	106.261 106.262	156047	New piping components are managed in accordance with the current Leak Detection and Repair (LDAR) fugitive monitoring program (28MID, 28CNTQ, 28PI and AVO) as required by NSR 104144 SC 13 (Permit Issue Date 02/08/2023).
B39GMFU1	106.262	160836	New piping components are managed in accordance with the current Leak Detection and Repair (LDAR) fugitive monitoring program (28MID, 28CNTQ, 28PI and AVO) as required by NSR 104144 SC 13 (Permit Issue Date 02/08/2023).
B39GMFU1	106.261 106.262	161122	New piping components are managed in accordance with the current Leak Detection and Repair (LDAR) fugitive monitoring program (28MID, 28CNTQ, 28PI and AVO) as required by NSR 104144 SC 13 (Permit Issue Date 02/08/2023).
B39GMFU1	106.262	163567	New piping components are managed in accordance with the current Leak Detection and Repair (LDAR) fugitive monitoring program (28MID, 28CNTQ, 28PI and AVO) as required by NSR 104144 SC 13 (Permit Issue Date 02/08/2023).
B39GMFU3	106.262	149152	New piping components are managed in accordance with the current Leak Detection and Repair (LDAR) fugitive monitoring program (28MID, 28CNTQ, 28PI and AVO) as required by NSR 104144 SC 13 (Permit Issue Date 02/08/2023).
B39GMST801	106.262	152933	Maintain records of tank service and annual throughput.
PROGMA PROIPG PROPGA PROPGE	106.263	11/01/2003	Track emissions on a rolling 12-month basis.
B13PGST1226	106.472	09/04/2000	Maintain records of tank service and annual throughput.
B43IPST117	106.478	09/04/2000	Maintain records of tank service and annual throughput.

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September 19, 2024	O2221	RN100225945

Unit ID No.	PBR No.	Version No./Date Or Registration No.	Monitoring Requirement
B13PGST670	106.478	09/04/2000	Maintain records of tank service and annual throughput.
B13PGST506 B13PGST508	106.472 106.478	09/04/2000	Maintain records of tank service and annual throughput.
B13PGFU1	106.373	09/04/2000	Maintain records of additions to refrigeration system.
B43IPST170	106.478	09/04/2000	Maintain records of tank service and annual throughput.
B43IPST171	106.478	09/04/2000	Maintain records of tank service and annual throughput.
<b><i>B13PGFU1</i></b>	<b><i>106.373</i></b>	<b><i>09/04/2000</i></b>	<b><i>Maintain records of refrigerant addition.</i></b>
<b><i>B39GMFU1</i></b>	<b><i>106.262</i></b>	<b><i>164874</i></b>	<b><i>New piping components are managed in accordance with the current Leak Detection and Repair (LDAR) fugitive monitoring program (28MID, 28CNTQ, 28PI and AVO) as required by NSR 104144 SC 13 (Permit Issue Date 02/08/2023).</i></b>
<b><i>B39GMFU1</i></b>	<b><i>106.261</i> <b><i>106.262</i></b></b>	<b><i>175271</i></b>	<b><i>New piping components are managed in accordance with the current Leak Detection and Repair (LDAR) fugitive monitoring program (28MID, 28CNTQ, 28PI and AVO) as required by NSR 104144 SC 13 (Permit Issue Date 02/08/2023).</i></b>
<b><i>B17PEFU01</i></b>	<b><i>106.262</i></b>	<b><i>169380</i></b>	<b><i>New piping components are managed in accordance with the current Leak Detection and Repair (LDAR) fugitive monitoring program (28VHP, 28CNTQ, and AVO) as required by NSR 75721 SCs 5-8 (Permit Issue Date 01/17/2017).</i></b>

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**Texas Commission on Environmental Quality**

Date	Permit Number	Regulated Entity Number
September 19, 2024	O2221	RN100225945

Unit ID No.	PBR No.	Version No./Date Or Registration No.	Monitoring Requirement
<b>B13PGST243</b> <b>B13PGR5</b> <b>B13PGST622</b> <b>B13PGML43</b> <b>B13PGFAP67</b> <b>B13PGFA26</b>	106.262	168130	<i>Tanks will continue to meet the monitoring and recordkeeping requirements of NSR 18561 SC 8 and SC 9 (permit issue date 09/10/2019) for tank service and annual throughput.</i>  <i>Scrubber will continue to meet the requirements of NSR 18561 SC 22 (permit issue date 9/10/2019).</i>  <i>Maintain records of magsil addition.</i>  <i>Maintain records of filter-aid addition.</i>
<b>B17PEFU01</b> <b>B17PELRI</b>	106.261 106.262	177535***	<i>New piping components are managed in accordance with the current Leak Detection and Repair (LDAR) fugitive monitoring program (28VHP, 28CNTQ, and AVO) as required by NSR 75721 SCs 5-8 (Permit Issue Date 01/17/2017).</i>  <i>Maintain records of annual throughput.</i>

\*\*\*This PBR Registration is currently pending with TCEQ (Project #379753). This PBR package (106.261/11/01/2003 and 106.262/11/01/2003) was received by TCEQ on September 13, 2024.