

Texas Commission on Environmental Quality

Title V Existing

2203

Site Information (Regulated Entity)

What is the name of the permit area to be authorized?	CHEMICALS & METALS (3)
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) (##.#####)	29.4125
Longitude (W) (-###.#####)	95.944722
Primary SIC Code	2869
Secondary SIC Code	
Primary NAICS Code	325199
Secondary NAICS Code	
Regulated Entity Site Information	
What is the Regulated Entity's Number (RN)?	RN100225945
What is the name of the Regulated Entity (RE)?	DOW TEXAS OPERATIONS FREEPORT
Does the RE site have a physical address?	Yes
Physical Address	
Number and Street	2301 N BRAZOSPORT BLVD
City	FREEPORT
State	TX
ZIP	77541
County	BRAZORIA
Latitude (N) (##.#####)	28.9825
Longitude (W) (-###.#####)	-95.352777
Facility NAICS Code	
What is the primary business of this entity?	INDUSTRIAL CHEMICAL MANUFACTURING PLANT

Customer (Applicant) Information

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

Responsible Official Contact

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

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

9792389978

Extension

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

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

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)

2101 N BRAZOSPORT BLVD

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

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

9792381742

cschmidt6@dow.com

Title V General Information - Existing

1) Permit Type:

SOP

2) Permit Latitude Coordinate:

29 Deg 24 Min 45 Sec

3) Permit Longitude Coordinate:

95 Deg 56 Min 41 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.

2203-37189

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

[O2203_Form_OP-CRO1.pdf](/ePermitsExternal/faces/file?fileId=266101)

Hash

A5F44F1875626060A14FF9915E1A8A2EBC3C21F264ECB3E948E98D6AA82B516B

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 2203.
- 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:	170.85.8.247
Signature Date:	2025-06-26
Signature Hash:	47028DDAF3697FA5C70F77C16A06E50F53CC1EEEEAEF487D89AB53CE34D67B713
Form Hash Code at time of Signature:	2185380CB310A8AE4A9399B86941A8631C67098599F5FA3485264A363B40F349

Submission

Reference Number:	The application reference number is 796642
Submitted by:	The application was submitted by ER028176/Fran Q Falcon
Submitted Timestamp:	The application was submitted on 2025-06-26 at 17:00:09 CDT
Submitted From:	The application was submitted from IP address 170.85.8.247
Confirmation Number:	The confirmation number is 661332
Steers Version:	The STEERS version is 6.91
Permit Number:	The permit number is 2203

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.

I. Identifying Information
RN: RN100225945
CN: CN606209690
Account No.: BL-0082-R
Permit No.: O2203
Project No.: 37189
Area Name: Chemicals & Metals (3)
Company Name: The Dow Chemical Company
II. Certification Type <i>(Please mark appropriate box)</i>
<input type="checkbox"/> Responsible Official Representative <input checked="" type="checkbox"/> Duly Authorized Representative
III. Submittal Type <i>(Please mark appropriate box) (Only one response can be accepted per form)</i>
<input type="checkbox"/> SOP/TOP Initial Permit Application <input type="checkbox"/> Permit Revision, Renewal, or Reopening
<input type="checkbox"/> GOP Initial Permit Application <input type="checkbox"/> Update to Permit Application
<input checked="" type="checkbox"/> Other: <u>Working Draft Permit (WDP) Certification</u>

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

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

IV. Certification of Truth			
This certification does not extend to information which is designated by TCEQ as information for reference only.			
I, <u>Fran Quinlan Falcon</u> certify that I am the <u>DAR</u>			
<i>(Certifier Name printed or typed)</i>		<i>(RO or DAR)</i>	
and that, based on information and belief formed after reasonable inquiry, the statements and information dated during the time period or on the specific date(s) below, are true, accurate, and complete: <i>Note: Enter Either a Time Period or Specific Date(s) for each certification. This section must be completed. The certification is not valid without documentation date(s).</i>			
Time Period: From <u>April 7, 2025</u> to <u>June 26, 2025</u>			
<i>(Start Date)</i>		<i>(End Date)</i>	
Specific Dates: _____			
<i>(Date 1)</i>		<i>(Date 2)</i>	
<i>(Date 3)</i>		<i>(Date 4)</i>	
<i>(Date 5)</i>		<i>(Date 6)</i>	
Signature: _____ Signature Date: <u>June 26, 2025</u> Title: _____			
Title: <u>Texas Regional Environmental Leader</u>			



June 26, 2025

E-MAIL RESPONSE

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

The Dow Chemical Company, CN600356976
Chemicals & Metals (3), RN100225945
Title V Operating Permit WDP Response for Chemicals & Metals (3), 02203
TCEQ Project Number: 37189

Dear Mr. Swami,

The Dow Chemical Company (Dow) is providing comments on the Working Draft Permit provided on June 26, 2025.

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

Sincerely,

Crystal Schmidt

Crystal Schmidt
Air Permit Manager

enclosure

Working Draft Permit Comments

Dow has no further comments on the Title V O2203 Working Draft Permit (WDP).



June 12, 2025

E-MAIL RESPONSE

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

The Dow Chemical Company, CN600356976
Chemicals & Metals (3), RN100225945
Title V Operating Permit WDP Response for Chemicals & Metals (3), 02203
TCEQ Project Number: 37189

Dear Mr. Swami,

The Dow Chemical Company (Dow) is providing comments on the Working Draft Permit provided on June 5, 2025. Dow is also requesting a revision with this submittal. Please see Form OP-2 for more information.

Please do not hesitate to contact me at (979) 238-1742 or 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

Working Draft Permit Comments

Unit Summary

1. B68ALLR1: Please add this transfer rack back to this table with 30 TAC Chapter 115, Loading and Unloading of VOC applicability. This was not requested to be removed in the minor revision application received by TCEQ on September 23, 2024, nor the May 23, 2025, WDP response.

Applicable Requirements Summary (ARS)

1. B68ALLR1: Please add this transfer rack back to this table with 30 TAC Chapter 115, Loading and Unloading of VOC applicability. This was not requested to be removed in the minor revision application received by TCEQ on September 23, 2024, nor the May 23, 2025, WDP response.

Permit Shield

1. B68ALLR1: Please add this transfer rack back to this table with 40 CFR Part 63, Subpart G negative applicability. This was not requested to be removed in the minor revision application received by TCEQ on September 23, 2024, nor the May 23, 2025, WDP response.

New Source Review Authorization References by Emissions Unit

1. B68ALLR1: Please add this transfer rack back to this table. This was not requested to be removed in the minor revision application received by TCEQ on September 23, 2024, nor the May 23, 2025, WDP response.

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

Date:	June 12, 2025					
Permit No.:	O2203					
Regulated Entity No.:	RN100225945					
Company Name:	The Dow Chemical Company					
I. Description of Revision						
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	NO	B70PDF801	OP-UA7	N/A	Please add 30 TAC Chapter 115, HRVOC-Vent Gas Control positive applicability to this flare.

**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.
June 12, 2025	O2203	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
	1	B70PDF801	OP-UA7 OP-UA15	FS-801 PDC FLARE		147472 106.261/11/01/2003 [146077]	

**Texas Commission on Environmental Quality
Flare Attributes
Form OP-UA7 (Page 5)
Federal Operating Permit Program**

**Table 5a: Title 30 Texas Administrative Code Chapter 115 (30 TAC Chapter 115)
Subchapter H, Division 1: Highly-Reactive Volatile Organic Compounds-Vent Gas Control**

Date	Permit No.:	Regulated Entity No.
June 12, 2025	O2203	RN100225945

Unit ID No.	SOP Index No.	Out of Service	Total Gas Stream	Gas Stream Concentration	Exempt Date	Alternative Monitoring Approach	Modifications to Testing/Monitoring	Modifications to Testing/Monitoring ID No.	Flare Type
<i>B70PDF801</i>	<i>R5720-01</i>	<i>NO</i>	<i>YES</i>	<i>YES</i>		<i>OTHER</i>	<i>NONE</i>		<i>MULTI</i>

**Texas Commission on Environmental Quality
Flare Attributes
Form OP-UA7 (Page 6)
Federal Operating Permit Program**

**Table 5b: Title 30 Texas Administrative Code Chapter 115 (30 TAC Chapter 115)
Subchapter H, Division 1: Highly-Reactive Volatile Organic Compounds-Vent Gas Control**

Date	Permit No.:	Regulated Entity No.
June 12, 2025	O2203	RN100225945

Unit ID No.	SOP Index No.	Monitoring Requirements	§115.725(e) Requirements	Multi-Purpose Usage	Flow Rate	Physical Seal	Monitoring Option	§115.725(h)(4) Alternative	Tank Service
<i>B70PDF801</i>	<i>R5720-01</i>	<i>YES</i>							<i>NO</i>

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

Date: June 12, 2025	Regulated Entity No.: RN100225945	Permit No.: O2203
Company Name: The Dow Chemical Company	Area Name: Chemicals & Metals (3)	

Revision No.	Unit/Group/Process ID No.	Unit/Group/Process Applicable Form	SOP/GOP Index No	Pollutant	Applicable Regulatory Requirement Name	Applicable Regulatory Requirement Standard(s)
1	<i>B70PDF801</i>	<i>OP-UA7</i>	<i>R5720-01</i>	<i>HRVOC</i>	<i>30 TAC Chapter 115, HRVOC-Vent Gas Control</i>	<i>115.722(d), 115.722(d)(1)-(2), [G]115.725(d)(1), (d)(2), (d)(2)(A)(i), [G]115.725(d)(2)(A)(ii), 115.725(d)(2)(A)(iii)-(iv), (d)(2)(B), 115.725(d)(2)(B)(i)-(iv), (l), (n), [G]115.726(a)(2)</i>

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

Date: June 12, 2025	Regulated Entity No.: RN100225945	Permit No.: O2203
Company Name: The Dow Chemical Company	Area Name: Chemicals & Metals (3)	

Revision No.	Unit/Group/Process ID No.	SOP/GOP Index No.	Pollutant	Monitoring and Testing Requirements	Recordkeeping Requirements	Reporting Requirements
1	<i>B70PDF801</i>	<i>R5720-01</i>	<i>HRVOC</i>	<i>[G]115.725(d)(1), (d)(2), 115.725(d)(2)(A)(i), [G]115.725(d)(2)(A)(ii), 115.725(d)(2)(A)(iii)-(iv), 115.725(d)(2)(B), (d)(2)(B)(i)-(iv), 115.725(d)(3)-(7), (k)(1)</i>	<i>115.726(a)(1), (a)(1)(A), (d)(1)-(4), 115.726(d)(10), (i), (j)(1)-(2)</i>	<i>115.725(n), 115.726(a)(1)(B), [G]115.726(a)(2)</i>

From: [Schmidt, Crystal \(C\)](#)
To: [Tusar Swami](#)
Subject: RE: Working Draft Permit -- FOP O2203/Project 37189, The DOW Chemical Company/Dow Texas Operations Freeport - Respond by 7/3/2025.
Date: Thursday, June 26, 2025 4:46:02 PM
Attachments: [2025-06-26 WDP Response O2203.pdf](#)

Tusar,

Please see our attached response. I will get the Form OP-CRO1 uploaded into STEERS shortly for the DAR to sign and submit. Thanks so much on all of your help with this project!

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



Seek Together™

General Business

From: Tusar Swami <tusar.swami@tceq.texas.gov>
Sent: Thursday, June 26, 2025 3:41 PM
To: Schmidt, Crystal (C) <cschmidt6@dow.com>
Subject: RE: Working Draft Permit -- FOP O2203/Project 37189, The DOW Chemical Company/Dow Texas Operations Freeport - Respond by 7/3/2025.

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.

Crystal:

Please see the updated draft. It needs your final approval and an OP-CRO1 for the duration.

All comments dated June 12, 2025 are incorporated.

- B68ALLR1 is added back.
- B70PDF801 (OP-UA7) - 30 TAC Chapter 115, HRVOC Vent Gas requirements are added.
- B70PDF801 - 40 CFR Part 63, Subpart FFFF – Please note that all requirements are

manually evaluated by our Technical Specialist as per compliance date August 12, 2023. We agree with most with some changes.

- Please approve the working draft and **submit an OP-CRO1 for the duration 4/7/2025 thru the current date via STEERS.**

Looking forward to moving this project forward. Thanks!

Sincerely,

Tusar Swami, P.E.

Texas Commission on Environmental Quality

OA/APD/Operating Permits Section

12100 Park 35 Circle, Bldg. C, Austin, TX 78753

Mail: MC-163, P. O. Box 13087, Austin, TX 78711-3087

Phone: 512/239-1581 Fax: 512/239-1400

Email: tusar.swami@tceq.texas.gov



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

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

Sent: Thursday, June 12, 2025 11:57 AM

To: Tusar Swami <tusar.swami@tceq.texas.gov>

Subject: RE: Working Draft Permit -- FOP O2203/Project 37189, The DOW Chemical Company/Dow Texas Operations Freeport - Respond by 6/13.

Tusar,

Please see our attached response and let me know if you have any questions. 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



Seek Together™



May 23, 2025

E-MAIL RESPONSE

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

The Dow Chemical Company, CN600356976
Chemicals & Metals (3), RN100225945
Title V Operating Permit WDP Response for Chemicals & Metals (3), 02203
TCEQ Project Number: 37189

Dear Mr. Swami,

The Dow Chemical Company (Dow) is providing comments on the Working Draft Permit provided on May 9, 2025. Dow is also requesting a revision with this submittal. Please see Form OP-2 for more information.

Please do not hesitate to contact me at (979) 238-1742 or 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

Working Draft Permit Comments

Special Terms and Conditions (ST&C)

1. Please remove ST&C 17.E and 17.F. These items are blank.

Unit Summary

1. B13GBPT703 (R5121-02): Please update the Requirement Drive from “No changing attributes” to “Control Device ID = B33INS1 (O2211)”.
2. B13GBPT703 (R5121-03): Please update the Requirement Drive from “No changing attributes” to “Control Device ID = B34VMTO210 (O2211)”.
3. B13GBPT703 (R5121-07): Please update the Requirement Drive from “No changing attributes” to “Control Device ID = B8MBTO180 (O2211)”.
4. B13GBPT703 (R5121-09): Please update the Requirement Drive from “No changing attributes” to “Control Device ID = B35EWS200 (O2211)”.
5. B13GBV703 (63G-02): Please add “Control Device ID = B33INS1 (O2211)” to the Requirement Driver.
6. B13GBV703 (63G-03): Please add “Control Device ID = B34VMTO210 (O2211)” to the Requirement Driver.
7. B13GBV703 (63G-07): Please add “Control Device ID = B8MBTO180 (O2211)” to the Requirement Driver.
8. B13GBV703 (63G-09): Please add “Control Device ID = B35EWS200 (O2211)” to the Requirement Driver.
9. B23G2LR8: Please add 40 CFR Part 63, Subpart G applicability to this unit as requested in Revision #4 in the application received by TCEQ on September 23, 2024.
10. B54EOCL1 (63PPP-01): Please update the Unit Type from “FUGITIVE EMISSIONS UNITS” to “LOADING/UNLOADING OPERATIONS”.

Applicable Requirements Summary (ARS)

1. B23G2LR8: Please add 40 CFR Part 63, Subpart G applicability to this unit as requested in Revision #4 in the application received by TCEQ on September 23, 2024.
2. B70PDF801 (63FFFF-01): Please add the new citations that became applicable after the August 12, 2023, rule change and remove the citations that are no longer applicable after the August 12, 2023, rule change as requested in Revision #5 in the application received by TCEQ on September 23, 2024. Please see Form OP-REQ3 that was included in that application.

Permit Shield

1. B13GBPT703: Please add the 40 CFR Part 63, Subpart G permit shield back to this unit. It was not requested to be removed in the Minor Revision application received by TCEQ on September 23, 2024.
2. B70PDF801: Please remove the 40 CFR Part 63, Subpart A permit shield as requested in Revision #5 in the application received by TCEQ on September 23, 2024.

New Source Review Authorization References

1. Please remove Standard Permit 137130 from this table. This Standard Permit only authorized B66QUSVD27, which has been removed from the Title V Permit. Also, this Standard Permit has been cancelled.

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

Date:	May 23, 2025					
Permit No.:	O2203					
Regulated Entity No.:	RN100225945					
Company Name:	The Dow Chemical Company					
I. Description of Revision						
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	NO	B68ALLR1	OP-SUMR	N/A	Please remove this unit from the entire Title V Permit. There is no loading or unloading operations at the B68 block of this permit area.

**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.
May 23, 2025	O2697	RN100225945

Unit/Process						Preconstruction Authorizations	
AI	Revision No.	ID No.	Applicable Form	Name/ Description	CAM	30 TAC Chapter 116/ 30 TAC Chapter 106	Title I
D	1	B68ALLR1	OP UA4	B68 LOADING		447472	

From: Schmidt, Crystal (C) <cschmidt6@dow.com>
Sent: Friday, May 23, 2025 12:32 PM
To: Tusar Swami
Subject: RE: Working Draft Permit -- FOP O2203/Project 37189, The DOW Chemical Company/Dow Texas Operations Freeport - Respond by 5/23
Attachments: 2025-05-23_WDP_Response_O2203.pdf

Tusar,

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

Crystal Schmidt

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



General Business

From: Tusar Swami <tusar.swami@tceq.texas.gov>
Sent: Friday, May 9, 2025 4:30 PM
To: Schmidt, Crystal (C) <cschmidt6@dow.com>
Subject: Working Draft Permit -- FOP O2203/Project 37189, The DOW Chemical Company/Dow Texas Operations Freeport - Respond by 5/23

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.

Crystal:

Good afternoon. I have conducted a technical review of *minor revision* application for The DOW Chemical Company/Dow Texas Operations Freeport. An electronic copy of the Working Draft Permit (WDP) is attached for your review. This WDP contains the TCEQ determination of applicable requirements based on the information submitted in your application dated September 23, 2024, and any updates provided.

Please review the WDP and submit to me any comments you have on the working draft permit by **May 23, 2025**. Please submit a written response by this deadline, even if you are not making any comments on the content of the WDP.

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_facsheet.pdf. This guidance contains important information regarding WDP review and comment procedures.

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

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

Please notify me when these updates have been submitted.

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

Contact me if you have any questions regarding the guidelines, the project schedule, or any other details regarding your application or permit. A quick acknowledgement to this email will be very much appreciated. Thank you for your cooperation.

Sincerely,

Tusar Swami, P.E.

**Texas Commission on Environmental Quality
OA/APD/Operating Permits Section**

12100 Park 35 Circle, Bldg. C, Austin, TX 78753
Mail: MC-163, P. O. Box 13087, Austin, TX 78711-3087
Phone: 512/239-1581 Fax: 512/239-1400
Email: tusar.swami@tceq.texas.gov



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April 9, 2025

E-MAIL RESPONSE

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

The Dow Chemical Company, CN600356976
Chemicals & Metals (3), RN100225945
Title V Operating Permit NOD Response for Chemicals & Metals (3), O2203
TCEQ Project Number: 37189

Dear Mr. Swami,

The Dow Chemical Company is providing a response to the Notice of Deficiency (NOD) items provided on April 7, 2025.

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

Sincerely,

Crystal Schmidt

Crystal Schmidt
Air Permit Manager

enclosure

cc:

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

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

Additional Information Request

Item 1	Revision item 4 - B23G2LR8 – OP-UA4, Table 7 – Please provide attribute values for MACT G
Item 1 Response	Dow does not believe that any updates are necessary for Form OP-UA4/Table 7. Transfer Rack Type = GRP2 Subject to Subpart BB = NO The instructions state that you continue only if Subject to Subpart BB is YES, or if Transfer Rack Type is GRP1.
Item 2	Revision item 5 - B70PDF801 – OP-UA15 is not submitted for MACT FFFF. Also, you need to submit OP-UA7 (Table 4) for MACT A
Item 2 Response	Dow included both of these forms in the Minor Revision application that was received by TCEQ on September 23, 2024. I have attached them to this response for convenience purposes.

Flare Attributes – Form OP-UA7 (Page 4)
Federal Operating Permit Program

Table 4: Title 40 Code of Federal Regulations Part 63
Subpart A: General Provisions of National Emission Standards for Hazardous Air Pollutants for Source Categories

Date	Permit No.:	Regulated Entity No.
April 9, 2025	O2203	RN100225945

Unit ID No.	SOP/GOP Index No.	Required Under 40 CFR Part 63	Heat Content Specification	Flare Assist Type	Flare Exit Velocity	Heating Value of Gas
<i>B70PDF801</i>	<i>63A-01</i>	<i>YES</i>	<i>YES</i>	<i>STEAM</i>	<i>60-400</i>	<i>1000-</i>
<i>B70PDF801</i>	<i>63A-02</i>	<i>YES</i>	<i>YES</i>	<i>STEAM</i>	<i>60-</i>	

Emission Point/Stationary Vent/Distillation Operation Vent/Process Vent Attributes – Form OP-UA15 (Page 32)
Federal Operating Permit Program

Table 13a: Title 40 Code of Federal Regulations Part 63 (40 CFR Part 63)

Subpart FFFF: National Emission Standards for Hazardous Air Pollutants: Miscellaneous Organic Chemical Manufacturing - Continuous Process Vents

Date	Permit No.	Regulated Entity No.
April 9, 2025	O2203	RN100225945

Emission Point ID No.	SOP Index No.	Emission Standard	Comb Device	95% Scrubber	PERF Test	Negative Pressure	Bypass Line
<i>B70PDF801</i>	<i>63FFFF-01</i>	<i>BLWFLR</i>					

Emission Point/Stationary Vent/Distillation Operation Vent/Process Vent Attributes – Form OP-UA15 (Page 32)
Federal Operating Permit Program

Table 13a: Title 40 Code of Federal Regulations Part 63 (40 CFR Part 63)

Subpart FFFF: National Emission Standards for Hazardous Air Pollutants: Miscellaneous Organic Chemical Manufacturing - Continuous Process Vents

Date	Permit No.	Regulated Entity No.
April 9, 2025	O2203	RN100225945

Emission Point ID No.	SOP Index No.	Designated GRP1	Designated HAL	Determined HAL	Prior Eval	Assessment Waiver	Assessment Waiver ID	Negative Pressure	Bypass Line
<i>B70PDF801</i>	<i>63FFFF-01</i>	<i>YES</i>	<i>NO</i>	<i>NO</i>	<i>NO</i>	<i>NO</i>		<i>NO</i>	<i>NO</i>

From: Schmidt, Crystal (C) <cschmidt6@dow.com>
Sent: Wednesday, April 9, 2025 1:05 PM
To: Tusar Swami
Subject: RE: Technical Review -- FOP O2203/Project 37189
Attachments: 2025-04-09_NOD_Response_O2203.pdf

Tusar,

Please see our attached response and let me know if you have any questions. 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



General Business

From: Tusar Swami <tusar.swami@tceq.texas.gov>
Sent: Monday, April 7, 2025 4:38 PM
To: Schmidt, Crystal (C) <cschmidt6@dow.com>
Subject: RE: Technical Review -- FOP O2203/Project 37189, The Dow Chemical Company/Chemicals & Metals (3) - respond by 4/17

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.

Crystal:

Need following things to complete my review,

- (1) Revision item 4 - B23G2LR8 – OP-UA4, Table 7 – Please provide attribute values for MACT G
- (2) Revision item 5 - B70PDF801 – OP-UA15 is not submitted for MACT FFFF. Also, you need to submit OP-UA7 (Table 4) for MACT A

Apparently, they are missing from the revision application. Please submit them by 4/17.

Sincerely,

Tusar Swami, P.E.

**Texas Commission on Environmental Quality
OA/APD/Operating Permits Section**

12100 Park 35 Circle, Bldg. C, Austin, TX 78753
Mail: MC-163, P. O. Box 13087, Austin, TX 78711-3087
Phone: 512/239-1581 Fax: 512/239-1400
Email: tusar.swami@tceq.texas.gov



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

From: Tusar Swami

Sent: Thursday, October 17, 2024 4:46 PM

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

Subject: Technical Review -- FOP O2203/Project 37189, The Dow Chemical Company/Chemicals & Metals (3)

Crystal:

Good Afternoon. I have been assigned to the Federal Operating Permit (FOP) revision application of Permit No. O2203 for The Dow Chemical Company/ Chemicals & Metals (3). This application has been assigned Project No. 37189. Please address all correspondence pertaining to this permit application, including any updates, to me at the address below, and use both the Permit and Project reference numbers above to facilitate tracking.

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

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

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

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

Please notify me when these updates have been submitted.

As required on Form OP-1, question IV.D, please remember the FOP application and all application updates must be submitted to EPA Region 6 at R6AirPermitsTX@epa.gov and to

the TCEQ regional office having jurisdiction. This submittal information can be found on our website at [Where to Submit FOP Applications and Permit-Related Documents](#).

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

Thank you for your cooperation.

Sincerely,

Tusar Swami, P.E.

Texas Commission on Environmental Quality

OA/APD/Operating Permits Section

12100 Park 35 Circle, Bldg. C, Austin, TX 78753

Mail: MC-163, P. O. Box 13087, Austin, TX 78711-3087

Phone: 512/239-1581 Fax: 512/239-1400

Email: tusar.swami@tceq.texas.gov



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

From: Tusar Swami
Sent: Thursday, October 17, 2024 4:46 PM
To: Schmidt, Crystal (C)
Subject: Technical Review -- FOP O2203/Project 37189, The Dow Chemical Company/Chemicals & Metals (3)

Crystal:

Good Afternoon. I have been assigned to the Federal Operating Permit (FOP) revision application of Permit No. O2203 for The Dow Chemical Company/ Chemicals & Metals (3). This application has been assigned Project No. 37189. Please address all correspondence pertaining to this permit application, including any updates, to me at the address below, and use both the Permit and Project reference numbers above to facilitate tracking.

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

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

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

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

Please notify me when these updates have been submitted.

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

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

Thank you for your cooperation.

Sincerely,

Tusar Swami, P.E.

Texas Commission on Environmental Quality

OA/APD/Operating Permits Section

12100 Park 35 Circle, Bldg. C, Austin, TX 78753

Mail: MC-163, P. O. Box 13087, Austin, TX 78711-3087

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Email: tusar.swami@tceq.texas.gov



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September 23, 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
Chemicals & Metals (3) – Title V Operating Permit O2203
Permit Minor Revision Application

Dear Mr. Bowers,

The Dow Chemical Company is submitting the Title V Operating Permit O2203 Minor Revision Application for the Chemicals & Metals (3) 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.

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
Application for Permit Revision/Renewal
Form OP-2 – Table 2**

Date:	September 23, 2024						
Permit No.:	O2203						
Regulated Entity No.:	RN100225945						
Company Name:	The Dow Chemical Company						
I. Description of Revision							
Revision No.	Revision Code	Unit/Group Process			NSR Authorization	Description of change and Provisional Terms and Conditions	
		New Unit	ID No.				
1	MS-C	NO	B66QUCT B66QUFU1 B66QUPU21 B66QUPU5 B66QUST2 B66QUST5 B66QUST57 B66QUST60	B66QUEST74 B66QUEST97 B66QUSVD27 B66QUVLR1 B66QUVLR2 B66QUVLR3A B66QUVLR3B PROQUAT	OP-SUMR	N/A	Please remove these units from the entire Title V Permit; they have been demolished.
2	MS-C	NO	B54EOCL1 PROEO		OP-UA1	N/A	Please remove 40 CFR Part 63, Subpart EEEE (OLD MACT) General High-Level Applicability from these units. Please add 40 CFR Part 63, Subpart PPP General High-Level Applicability to these units.
3	MS-C	NO	N/A		OP-REQ1 (Page 87)	N/A	Please remove NSR Permit 20776 from the list of authorizations for this Title V Permit. The NSR Permit was voided on February 27, 2024.
4	MS-C	NO	B23G2LR8		OP-UA1 OP-UA4	N/A	Please remove 40 CFR Part 63, Subpart EEEE (OLD MACT) General High-Level Applicability from this transfer rack. Please add 40 CFR Part 63, Subpart G (HON) positive applicability to this transfer rack.

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

Date:	September 23, 2024					
Permit No.:	O2203					
Regulated Entity No.:	RN100225945					
Company Name:	The Dow Chemical Company					
I. Description of Revision						
Revision No.	Revision Code	Unit/Group Process			NSR Authorization	Description of change and Provisional Terms and Conditions
		New Unit	ID No.	Applicable Form		
5	MS-C	NO	B70PDF801	OP-UA7 OP-UA15 OP-REQ2	N/A	<p>Please add 40 CFR Part 63, Subpart A and 40 CFR Part 63, Subpart FFFF (MON) positive applicability to this flare.</p> <p>Please see Form OP-REQ3 for MON detailed citations. Dow is requesting to add the new citations that became applicable after the August 12, 2023 rule change and to not include the citations that were no longer applicable after the August 12, 2023 rule change. Citations in red are not in the current flowchart.</p> <p>Please remove 40 CFR Part 63, Subpart A negative applicability from this flare.</p>
6	MS-C	NO	Multiple	OP-SUMR OP-PBRSUP	N/A	<p>Please update the PBR Supplemental Table to include any changes that have been made since the permit was last renewed in March 2024 (Project #34609).</p> <p>Please update the authorizations for these units on the Form OP-SUMR to match the PBR Supplemental Table.</p>

**Texas Commission on Environmental Quality
Federal Operating Permit Program
Individual Unit Summary for Revisions
Form OP-SUMR
Table 1**

Date	Permit No.	Regulated Entity No.
September 23, 2024	O2203	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
	4	B23G2LR8	OP-UA1 OP-UA4	SOIL FUMIGANT LOADING FACILITY		147470	
	2	B54EOCL1	OP-UA1 OP-UA4	RAIL CAR UNLOADING		112341	
D	1	B66QUCT	OP-UA13	COOLING TOWER		20776 106.371/09/04/2000	
D	1	B66QUFU1	OP-UA1	QUAT FUGITIVES		20776 106.261/11/01/2003 [112408, 118291, 124431, 136750, 15459, 161005] 106.262/11/01/2003 [112408, 118291, 119371, 124431, 136750, 137208, 145845, 154959, 161005, 166150] 106.472/09/04/2000 [118291]	
D	1	B66QUPU21	OP-UA15	E-21 PROCESS VENT		20776	
D	1	B66QUPU25	OP-UA15	T-5 PROCESS VENT		20776 106.261/11/01/2003 106.262/11/01/2003	
D	1	B66QUST2	OP-UA3	D-2 EPI STORAGE TANK		20776	
D	1	B66QUST5	OP-UA3	T-5 MECL2/DCP STORAGE TANK		20776	

**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 23, 2024	O2203	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
D	1	B66QUST57	OP-REQ2	D-570 MECL2 STORAGE TANK		20776	
D	1	B66QUST60	OP-UA3	D-60 WASTEWATER STORAGE TANK		20776	
D	1	B66QUST74	OP-UA3	D-74 GLYCOL STORAGE TANK		20776	
D	1	B66QUST97	OP-REQ2	D-970 MECL2 STORAGE TANK		20776	
D	1	B66QUSVD27	OP-UA15	D-27 SCRUBBER VENT		137130	
D	1	B66QUVLR1	OP-UA4	RAILCAR LOADING/UNLOADING RACK		20776	
D	1	B66QUVLR2	OP-UA4	QUAT TANK TRUCK LOADING		20776	
D	1	B66QUVLR3A	OP-UA4	MECL2 UNLOADING RACK		20776	
D	1	B66QUVLR3B	OP-UA4	MECL2 UNLOADING RACK		20776	
	5	B70PDF801	OP-UA7 <i>OP-UA15</i>	FS-801 PDC FLARE		147472 106.261/11/01/2003 [146077]	

**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 23, 2024	O2203	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	PROEO	OP-UA1 OP-UA57	PROCESS UNIT ID FOR ETHYLENE OXIDE DISTRIBUTION		112341	
D	1	PROQUAT	OP-UA57 OP-UA60	QUAT 188 PROCESS UNIT		20776	

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 23, 2024	O2203	RN100225945

Unit ID No.	Registration No.	PBR No.	Registration Date
B54EOFU2	134008	106.262	08/21/2015
B54EOFU2	161293	106.262	05/22/2020
B76POFU1	135709	106.262	10/26/2015
B76POFU1	149239	106.373	11/07/2017
B76POFU1	165221	106.261 106.262	06/25/2021
OC3ST78	143752	106.264	11/30/2016
OC3ST78	148119	106.262	09/06/2017
OC9DOLRRR OC9DOLRTRK	144045	106.472	01/04/2017
OC3DOFU10	146074	106.262	04/14/2017
OC3DOFU10	154299	106.262	01/04/2019
OC3T01	168623	106.264	05/13/2022
B23G2FU2	160149	106.262	03/05/2020
B23G2FU2	167918	106.261	02/16/2022

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
September 23, 2024	O2203	RN100225945

Unit ID No.	Registration No.	PBR No.	Registration Date
B23G2FU2	168532	106.261 106.262	04/04/2022
B19G1FU7	146713	106.262	06/08/2017
B19G1GU1	170108	106.262	09/22/2022
B19G1GU1	170612	106.261	10/20/2022
B75POFU1	139422	106.262	06/01/2016
B75POFU1	143462	106.262	10/28/2016
B75POFU1	146981	106.261 106.262	06/20/2017
B75POFU1	150103	106.262	03/06/2018
B13GBFU3 B13GBDL1	146226	106.261	04/21/2017
B75POCT75	148707	106.371	09/26/2017
B13GBFU3 B13GBFU4 B75POFU1	150804	106.261 106.262	04/06/2018
B13GBFU4	153453	106.262	10/24/2018

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 23, 2024	O2203	RN100225945

Unit ID No.	Registration No.	PBR No.	Registration Date
B75POFU3	154150	106.261 106.262	01/11/2019
B13GBFU4	157864	106.262	08/08/2019
B75POFU3	159158	106.261 106.262	11/21/2019
B75POFU1	163416	106.262	12/08/2020
B13GBFU3	169541	106.261	07/11/2022
B68PDFU1	140145	106.262	06/07/2016
B68PDFU1	142146	106.262	09/02/2016
B68PDFU1 B70ALF801	146077	106.261	05/24/2017
B68PDFU1	147119	106.261	06/29/2017
B68PDFU1	149654	106.261 106.262	01/11/2018
B68PDFU1	152956	106.261 106.262	08/20/2018
B68PDFU1	157525	106.261	07/12/2019
B68PDFU1	158921	106.262	11/05/2019

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 23, 2024	O2203	RN100225945

Unit ID No.	Registration No.	PBR No.	Registration Date
B68PDFU1	161234	106.262	05/21/2020
B68PDFU1	163005	106.261 106.262	10/26/2020
B68PDFU1	165160	106.261 106.262	06/03/2021
B68PDFU1	165480	106.261 106.262	07/20/2021
B68PDFU1	167230	106.261	12/17/2021
B68PDFU1	168015	106.262	03/16/2022
B68PDFU1	170892	106.261 106.262	11/18/2022
B13GBPU307 B30POST3001	133449	106.472	07/21/2015
B66QUFU1	112408	106.261 106.262	10/14/2013
B66QUFU1 B66QUV53	118291	106.261 106.262 106.472	06/11/2014
B66QUFU1	119371	106.262	07/08/2014
B66QUFU1	124431	106.261 106.262	12/14/2014

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 23, 2024	O2203	RN100225945

Unit ID No.	Registration No.	PBR No.	Registration Date
B66QUFU1	136750	106.261 106.262	01/13/2016
B66QUFU1	137208	106.262	01/27/2016
B66QUFU1	145845	106.262	03/30/2017
B66QUFU1	154959	106.261 106.262	02/19/2019
B66QUFU1	161005	106.261 106.262	08/21/2020
B66QUFU1	166150	106.262	08/07/2021

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 23, 2024	O2203	RN100225945

Unit ID No.	PBR No.	Version No./Date
B54EOFU2	106.373	09/04/2000
B66QUCT	106.371	09/04/2000
B19CT490	106.371	09/04/2000

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

Date	Permit Number	Regulated Entity Number
September 23, 2024	O2203	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 23, 2024	O2203	RN100225945

Unit ID No.	PBR No.	Version No./Date Or Registration No.	Monitoring Requirement
B54EOFU2	106.373	09/04/2000	Maintain records of additions to refrigeration system
B66QUCT	106.371	09/04/2000	The cooling water is being monitored for the presence of HAPs or other representative substances that would indicate a leak
B19CT490	106.371	09/04/2000	The plant's cooling water shall be sampled daily for conductivity; results shall be used to demonstrate compliance with the representation in the June 30, 2013 application
B54EOFU2	106.262	11/01/2003	New piping components are managed in accordance with the current Leak Detection and Repair (LDAR) fugitive monitoring program 28MID.
B54EOFU2	106.262	11/01/2003	New piping components are managed in accordance with the current Leak Detection and Repair (LDAR) fugitive monitoring program 28MID.
B76POFU1	106.262	11/01/2003	New piping components are managed in accordance with the current Leak Detection and Repair (LDAR) fugitive monitoring program 28VHP
B76POFU1	106.373	09/04/2000	Maintain records of additions to refrigeration system
B76POFU1	106.261 106.262	11/01/2003	New piping components are managed in accordance with the current Leak Detection and Repair (LDAR) fugitive monitoring program 28VHP
OC3ST78	106.264	09/04/2000	Maintain records of tanks service and annual throughput.
OC3ST78	106.262	11/01/2003	Maintain records of tanks service and annual throughput.
OC9DOLRRR OC9DOLRTRK	106.472	09/04/2000	Maintain records of no visible emissions; maintain records of leak-tight testing.
OC3DOFU10	106.262	11/01/2003	New piping components are managed in accordance with the current Leak Detection and Repair (LDAR) fugitive monitoring program 28PI

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 23, 2024	O2203	RN100225945

Unit ID No.	PBR No.	Version No./Date Or Registration No.	Monitoring Requirement
OC3DOFU10	106.262	11/01/2003	New piping components are managed in accordance with the current Leak Detection and Repair (LDAR) fugitive monitoring program 28PI
OC3T01	106.264	09/04/2000	Must operate at 99.9 % DRE or maintain the VOC concentration in the exhaust gas less than 10 ppmv on a dry basis corrected to 3% O2
B23G2FU2	106.262	11/01/2003	New piping components are managed in accordance with the current Leak Detection and Repair (LDAR) fugitive monitoring program 28MID and 28CNTA
B23G2FU2	106.261	11/01/2003	New piping components are managed in accordance with the current Leak Detection and Repair (LDAR) fugitive monitoring program 28MID and 28CNTA
B23G2FU2	106.261 106.262	11/01/2003 11/01/2003	New piping components are managed in accordance with the current Leak Detection and Repair (LDAR) fugitive monitoring program 28MID and 28CNTA
B19G1FU7	106.262	11/01/2003	New piping components are managed in accordance with the current Leak Detection and Repair (LDAR) fugitive monitoring program 28VHP and 28CNTA
B19G1GU1	106.262	11/01/2003	New piping components are managed in accordance with the current Leak Detection and Repair (LDAR) fugitive monitoring program 28VHP and 28CNTA
B19G1GU1	106.261	11/01/2003	New piping components are managed in accordance with the current Leak Detection and Repair (LDAR) fugitive monitoring program 28VHP and 28CNTA
B75POFU1	106.262	11/01/2003	New piping components are managed in accordance with the current Leak Detection and Repair (LDAR) fugitive monitoring program 28VHP
B75POFU1	106.262	11/01/2003	New piping components are managed in accordance with the current Leak Detection and Repair (LDAR) fugitive monitoring program 28VHP
B75POFU1	106.261 106.262	11/01/2003 11/01/2003	New piping components are managed in accordance with the current Leak Detection and Repair (LDAR) fugitive monitoring program 28VHP

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 23, 2024	O2203	RN100225945

Unit ID No.	PBR No.	Version No./Date Or Registration No.	Monitoring Requirement
B75POFU1	106.262	11/01/2003	New piping components are managed in accordance with the current Leak Detection and Repair (LDAR) fugitive monitoring program 28VHP
B13GBFU3 B13GBDL1	106.261	11/01/2003	New piping components are managed in accordance with the current Leak Detection and Repair (LDAR) fugitive monitoring program 28MID. Maintain records of annual throughput
B75POCT75	106.371	09/04/2000	HRVOC instrumented and monitored CT
B13GBFU3 B13GBFU4 B75POFU1	106.261 106.262	11/01/2003 11/01/2003	New piping components are managed in accordance with the current Leak Detection and Repair (LDAR) fugitive monitoring program 28VHP
B13GBFU4	106.262	11/01/2003	New piping components are managed in accordance with the current Leak Detection and Repair (LDAR) fugitive monitoring program 28VHP
B75POFU3	106.261 106.262	11/01/2003 11/01/2003	New piping components are managed in accordance with the current Leak Detection and Repair (LDAR) fugitive monitoring program 28VHP
B13GBFU4	106.262	11/01/2003	New piping components are managed in accordance with the current Leak Detection and Repair (LDAR) fugitive monitoring program 28VHP
B75POFU3	106.261 106.262	11/01/2003 11/01/2003	New piping components are managed in accordance with the current Leak Detection and Repair (LDAR) fugitive monitoring program 28VHP
B75POFU1	106.262	11/01/2003	New piping components are managed in accordance with the current Leak Detection and Repair (LDAR) fugitive monitoring program 28VHP
B13GBFU3	106.261	11/01/2003	New piping components are managed in accordance with the current Leak Detection and Repair (LDAR) fugitive monitoring program 28VHP

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 23, 2024	O2203	RN100225945

Unit ID No.	PBR No.	Version No./Date Or Registration No.	Monitoring Requirement
B68PDFU1	106.262	11/01/2003	New piping components are managed in accordance with the current Leak Detection and Repair (LDAR) fugitive monitoring program 28MID
B68PDFU1	106.262	11/01/2003	New piping components are managed in accordance with the current Leak Detection and Repair (LDAR) fugitive monitoring program 28MID
B68PDFU1 B70ALF801	106.261	11/01/2003	New piping components are managed in accordance with the current Leak Detection and Repair (LDAR) fugitive monitoring program 28MID Flare will continue to meet the monitoring and recordkeeping requirements of NSR 147472 SC #8 for minimum net heating value and exit velocity.
B68PDFU1	106.261	11/01/2003	New piping components are managed in accordance with the current Leak Detection and Repair (LDAR) fugitive monitoring program 28MID
B68PDFU1	106.261 106.262	11/01/2003 11/01/2003	New piping components are managed in accordance with the current Leak Detection and Repair (LDAR) fugitive monitoring program 28MID
B68PDFU1	106.261 106.262	11/01/2003 11/01/2003	New piping components are managed in accordance with the current Leak Detection and Repair (LDAR) fugitive monitoring program 28MID
B68PDFU1	106.261	11/01/2003	New piping components are managed in accordance with the current Leak Detection and Repair (LDAR) fugitive monitoring program 28MID
B68PDFU1	106.262	11/01/2003	New piping components are managed in accordance with the current Leak Detection and Repair (LDAR) fugitive monitoring program 28MID
B68PDFU1	106.262	11/01/2003	New piping components are managed in accordance with the current Leak Detection and Repair (LDAR) fugitive monitoring program 28MID
B68PDFU1	106.261 106.262	11/01/2003 11/01/2003	New piping components are managed in accordance with the current Leak Detection and Repair (LDAR) fugitive monitoring program 28MID

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 23, 2024	O2203	RN100225945

Unit ID No.	PBR No.	Version No./Date Or Registration No.	Monitoring Requirement
B68PDFU1	106.261 106.262	11/01/2003 11/01/2003	New piping components are managed in accordance with the current Leak Detection and Repair (LDAR) fugitive monitoring program 28MID
B68PDFU1	106.261 106.262	11/01/2003 11/01/2003	New piping components are managed in accordance with the current Leak Detection and Repair (LDAR) fugitive monitoring program 28MID
B68PDFU1	106.261	11/01/2003	New piping components are managed in accordance with the current Leak Detection and Repair (LDAR) fugitive monitoring program 28MID
B68PDFU1	106.262	11/01/2003	New piping components are managed in accordance with the current Leak Detection and Repair (LDAR) fugitive monitoring program 28MID
B68PDFU1	106.261 106.262	11/01/2003 11/01/2003	New piping components are managed in accordance with the current Leak Detection and Repair (LDAR) fugitive monitoring program 28MID
B13GBPU307 B30POST3001	106.472	09/04/2000	Maintain records of tank contents
B66QUFU1	106.261 106.262	11/01/2003 11/01/2003	New piping components are managed in accordance with the current Leak Detection and Repair (LDAR) fugitive monitoring program 28MID
B66QUFU1 B66QUV53	106.261 106.262 106.472	11/01/2003 11/01/2003 09/04/2000	New piping components are managed in accordance with the current Leak Detection and Repair (LDAR) fugitive monitoring program 28MID Maintain records of tank contents
B66QUFU1	106.262	11/01/2003	New piping components are managed in accordance with the current Leak Detection and Repair (LDAR) fugitive monitoring program 28MID
B66QUFU1	106.261 106.262	11/01/2003 11/01/2003	New piping components are managed in accordance with the current Leak Detection and Repair (LDAR) fugitive monitoring program 28MID

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 23, 2024	O2203	RN100225945

Unit ID No.	PBR No.	Version No./Date Or Registration No.	Monitoring Requirement
B66QUFU1	106.261 106.262	11/01/2003 11/01/2003	New piping components are managed in accordance with the current Leak Detection and Repair (LDAR) fugitive monitoring program 28MID
B66QUFU1	106.262	11/01/2003	New piping components are managed in accordance with the current Leak Detection and Repair (LDAR) fugitive monitoring program 28MID
B66QUFU1	106.262	11/01/2003	New piping components are managed in accordance with the current Leak Detection and Repair (LDAR) fugitive monitoring program 28MID
B66QUFU1	106.261 106.262	11/01/2003 11/01/2003	New piping components are managed in accordance with the current Leak Detection and Repair (LDAR) fugitive monitoring program 28MID
B66QUFU1	106.261 106.262	11/01/2003 11/01/2003	New piping components are managed in accordance with the current Leak Detection and Repair (LDAR) fugitive monitoring program 28MID
B66QUFU1	106.262	11/01/2003	New piping components are managed in accordance with the current Leak Detection and Repair (LDAR) fugitive monitoring program 28MID

Miscellaneous Unit Attributes – Form OP-UA1 (Page 1)
Federal Operating Permit Program

Date	Permit No.	Regulated Entity No.
September 23, 2024	O2203	RN100225945

Unit ID No.	SOP/GOP Index No.	Unit Type	Date Constructed/Placed in Service	Functionally Identical Replacement	Maximum Rated Capacity	Technical Information and Unit Description
B23G2LR8	63EEEE-01	EU				Please add 40 CFR Part 63, Subpart EEEE General High Level Applicability to this unit
B54EOCL1	63EEEE-01	EU				Please add 40 CFR Part 63, Subpart EEEE General High Level Applicability to this unit
<i>B54EOCL1</i>	<i>63PPP-01</i>	<i>EU</i>				<i>Please add 40 CFR Part 63, Subpart PPP General High-Level Applicability to this unit</i>
PROEO	63EEEE-01	EU				Please add 40 CFR Part 63, Subpart EEEE General High Level Applicability to this unit
<i>PROEO</i>	<i>63PPP-01</i>	<i>EU</i>				<i>Please add 40 CFR Part 63, Subpart PPP General High-Level Applicability to this unit</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 23, 2024	O2203	RN100225945

Unit ID No.	SOP Index No.	Transfer Rack Type	Subject to Subpart BB	Compliance Options	Closed Vent System	Hard Piping
<i>B23G2LR8</i>	<i>63G-01</i>	<i>GRP2</i>	<i>NO</i>			

Flare Attributes – Form OP-UA7 (Page 4)
Federal Operating Permit Program

Table 4: Title 40 Code of Federal Regulations Part 63
Subpart A: General Provisions of National Emission Standards for Hazardous Air Pollutants for Source Categories

Date	Permit No.:	Regulated Entity No.
September 23, 2024	O2203	RN100225945

Unit ID No.	SOP/GOP Index No.	Required Under 40 CFR Part 63	Heat Content Specification	Flare Assist Type	Flare Exit Velocity	Heating Value of Gas
<i>B70PDF801</i>	<i>63A-01</i>	<i>YES</i>	<i>YES</i>	<i>STEAM</i>	<i>60-400</i>	<i>1000-</i>
<i>B70PDF801</i>	<i>63A-02</i>	<i>YES</i>	<i>YES</i>	<i>STEAM</i>	<i>60-</i>	

Emission Point/Stationary Vent/Distillation Operation Vent/Process Vent Attributes – Form OP-UA15 (Page 32)
Federal Operating Permit Program

Table 13a: Title 40 Code of Federal Regulations Part 63 (40 CFR Part 63)

Subpart FFFF: National Emission Standards for Hazardous Air Pollutants: Miscellaneous Organic Chemical Manufacturing - Continuous Process Vents

Date	Permit No.	Regulated Entity No.
September 23, 2024	O2203	RN100225945

Emission Point ID No.	SOP Index No.	Emission Standard	Comb Device	95% Scrubber	PERF Test	Negative Pressure	Bypass Line
<i>B70PDF801</i>	<i>63FFFF-01</i>	<i>BLWFLR</i>					

Emission Point/Stationary Vent/Distillation Operation Vent/Process Vent Attributes – Form OP-UA15 (Page 32)
Federal Operating Permit Program

Table 13a: Title 40 Code of Federal Regulations Part 63 (40 CFR Part 63)

Subpart FFFF: National Emission Standards for Hazardous Air Pollutants: Miscellaneous Organic Chemical Manufacturing - Continuous Process Vents

Date	Permit No.	Regulated Entity No.
September 23, 2024	O2203	RN100225945

Emission Point ID No.	SOP Index No.	Designated GRP1	Designated HAL	Determined HAL	Prior Eval	Assessment Waiver	Assessment Waiver ID	Negative Pressure	Bypass Line
<i>B70PDF801</i>	<i>63FFFF-01</i>	<i>YES</i>	<i>NO</i>	<i>NO</i>	<i>NO</i>	<i>NO</i>		<i>NO</i>	<i>NO</i>

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

Date:	September 23, 2024
Permit No.:	O2203
RN No.:	RN100225945

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

Form OP-REQ1: Page 87			
XII.NSR Authorizations (Attach additional sheets if necessary for sections E-J)			
E.PSD Permits and PSD Major Pollutants			
PSD Permit No.:	Issuance Date:	Pollutant(s):	
PSD Permit No.:	Issuance Date:	Pollutant(s):	
If PSD Permits are held for the application area, please complete the Major NSR Summary Table located under the Technical Forms heading at: www.tceq.texas.gov/permitting/air/titlev/site/site_experts.html .			
F.Nonattainment (NA) Permits and NA Major Pollutants			
NA Permit No.:	Issuance Date:	Pollutant(s):	
NA Permit No.:	Issuance Date:	Pollutant(s):	
If NA Permits are held for the application area, please complete the Major NSR Summary Table located under the Technical Forms heading at: www.tceq.texas.gov/permitting/air/titlev/site/site_experts.html .			
G.NSR Authorizations with FCAA 112(g) Requirements			
NSR Permit No.:	Issuance Date:	NSR Permit No.:	Issuance Date:
NSR Permit No.:	Issuance Date:	NSR Permit No.:	Issuance Date:
NSR Permit No.:	Issuance Date:	NSR Permit No.:	Issuance Date:
H.Title 30 TAC Chapter 116 Permits, Special Permits, Standard Permits, Other Authorizations (Other Than Permits By Rule, PSD Permits, NA Permits) for the Application Area			
Authorization No.: 4031	Issuance Date: 01/22/2020	Authorization No.: 137130	Issuance Date: 12/15/2015
Authorization No.: 20776	Issuance Date: 04/12/2016	Authorization No.: 147470	Issuance Date: 07/24/2019
Authorization No.: 26692	Issuance Date: 09/12/2016	Authorization No.: 147472	Issuance Date: 09/16/2022
Authorization No.: 28363	Issuance Date: 10/04/2016	Authorization No.: 147473	Issuance Date: 10/07/2019
Authorization No.: 112341	Issuance Date: 01/07/2016	Authorization No.: 149604	Issuance Date: 02/20/2018

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

Date:	September 23, 2024
Permit No.:	O2203
RN No.:	RN100225945

For SOP applications, answer ALL questions unless otherwise directed.

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

Form OP-REQ1: Page 88	
XII.NSR Authorizations (Attach additional sheets if necessary for sections E-J)	
I.Permits by Rule (30 TAC Chapter 106) for the Application Area	
<i>A list of selected Permits by Rule (previously referred to as standard exemptions) that are required to be listed in the FOP application is available in the instructions.</i>	
Number: 106.261	Version No./Date: 12/24/1998; 11/01/2003
Number: 106.262	Version No./Date: 09/04/2000; 11/01/2003
Number: 106.263	Version No./Date: 11/01/2001
Number: 106.264	Version No./Date: 09/04/2000
Number: 106.265	Version No./Date: 09/04/2000
Number: 106.371	Version No./Date: 09/04/2000
Number: 106.373	Version No./Date: 03/14/1997; 09/04/2000
Number: 106.452	Version No./Date: 09/04/2000
Number: 106.454	Version No./Date: 11/01/2001
Number: 106.472	Version No./Date: 09/04/2000
Number: 106.476	Version No./Date: 09/04/2000
Number: 106.478	Version No./Date: 03/14/1997
Number: 106.532	Version No./Date: 09/04/2000

Form OP-REQ2
Negative Applicable/Superseded Requirement Determinations
Texas Commission on Environmental Quality

Date	Permit No.	Regulated Entity No.
September 23, 2024	O2232	RN100223205

Unit AI	Revision No.	Unit/Group/Process ID No.	Unit/Group/Process Applicable Form	Potentially Applicable Regulatory Name	Negative Applicability/Superseded Requirement Citation	Negative Applicability/Superseded Requirement Reason
D	5	B70PDF801	OP-UA7	40 CFR Part 63, Subpart A	63.11(a)	The flare is not required by Subpart under 40 CFR Part 63

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

Date: September 23, 2024	Regulated Entity No.: RN100225945	Permit No.: O2203
Company Name: The Dow Chemical Company	Area Name: Chemicals & Metals (3)	

Revision No.	Unit/Group/Process ID No.	Unit/Group/Process Applicable Form	SOP/GOP Index No	Pollutant	Applicable Regulatory Requirement Name	Applicable Regulatory Requirement Standard(s)
4	<i>B23G2LR8</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>
2	B54EOCL1	OP-UA1	63EEEE-01	HAPS	40 CFR Part 63, Subpart EEEE	63.2338(b)
2	<i>B54EOCL1</i>	<i>OP-UA1</i>	<i>63PPP-01</i>	<i>HAPS</i>	<i>40 CFR Part 63, Subpart PPP</i>	<i>63.1420</i>
5	<i>B70PDF801</i>	<i>OP-UA7</i>	<i>63A-01</i>	<i>HAPS</i>	<i>40 CFR Part 63, Subpart A</i>	<i>63.11(b)(4), 63.11(b)(1)-(3), (b)(5), 63.11(b)(6)(ii), (b)(7)(iii)</i>
5	<i>B70PDF801</i>	<i>OP-UA7</i>	<i>63A-02</i>	<i>HAPS</i>	<i>40 CFR Part 63, Subpart A</i>	<i>63.11(b)(4), 63.11(b)(1)-(3), (b)(5), 63.11(b)(6)(ii), (b)(7)(i)</i>
5	<i>B70PDF801</i>	<i>OP-UA15</i>	<i>63FFFF-01</i>	<i>HAPS</i>	<i>40 CFR Part 63, Subpart FFFF</i>	<i>63.2455(a)-Table 1.1.a.ii, 63.2450(a)(2), 63.2450(b), (e)(4)-(5), (k)(8), (u), 63.2455(a), (b), (b)(1), 63.2535(m)(1)-(2), 63.982(a), 63.983(a)(1)-(2), (d)(1), (d)(1)(i), [G]63.983(d)(2), (d)(3), 63.987(a), (b)(1), 63.987(b)(3), [G]63.997(e)(1), (e)(3), 63.11(b)</i>
2	PROEO	OP-UA1	63EEEE-01	HAPS	40 CFR Part 63, Subpart EEEE	63.2338(b)
2	<i>PROEO</i>	<i>OP-UA1</i>	<i>63PPP-01</i>	<i>HAPS</i>	<i>40 CFR Part 63, Subpart PPP</i>	<i>63.1420</i>

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

Date: September 23, 2024	Regulated Entity No.: RN100225945	Permit No.: O2203
Company Name: The Dow Chemical Company	Area Name: Chemicals & Metals (3)	

Revision No.	Unit/Group/Process ID No.	SOP/GOP Index No.	Pollutant	Monitoring and Testing Requirements	Recordkeeping Requirements	Reporting Requirements
4	<i>B23G2LR8</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>
2	B54EOCL1	63EEEE-01	HAPS	General High Level Applicability	General High Level Applicability	General High Level Applicability
2	<i>B54EOCL1</i>	<i>63PPP-01</i>	<i>HAPS</i>	<i>General High-Level Applicability</i>	<i>General High-Level Applicability</i>	<i>General High-Level Applicability</i>
5	<i>B70PDF801</i>	<i>63A-01</i>	<i>HAPS</i>	<i>63.11(b)(4)-(5), (b)(7)(i)</i>	<i>NONE</i>	<i>NONE</i>
5	<i>B70PDF801</i>	<i>63A-02</i>	<i>HAPS</i>	<i>63.11(b)(4)-(5), (b)(7)(i)</i>	<i>NONE</i>	<i>NONE</i>
5	<i>B70PDF801</i>	<i>63FFFF-01</i>	<i>HAPS</i>	<i>63.983(b), [G](b)(1)-(3), [G]63.983(c)(1), (c)(2)-(3), 63.983(d)(1), (d)(1)(ii) [G]63.987(b)(3)(i), 63.987(b)(3)(ii)-(iv), (e), 63.997(a), [G](e)(1), (e)(2)-(3), 63.997(e)(3)(i)-(ii), [G]63.115(d)(2)(v), (d)(3)(iii)</i>	<i>63.2450(f)(2), (f)(2)(i)-(ii), (k)(1)(ii), 63.2450(k)(7), 63.2525(m), 63.983(b), 63.983(b)(3)(ii), [G](d)(2), 63.987(b)(1), (e), 63.998(a)(1), [G]63.998(a)(1)(i), (a)(1)(ii), 63.998(a)(1)(iii)(A)-(B), [G](b)(1)-(2), [G]63.998(b)(3), [G](b)(5), [G](d)(1), 63.998(d)(3)(i)-(ii), (d)(5)</i>	<i>63.2450(f)(2)(ii), (g), 63.987(b)(1) 63.997(e)(3), 63.998(a)(1)(iii)(A), [G]63.998(b)(3), [G]63.999(a)(1)-(2), (b)(5), (c)(1), 63.999(c)(2)(i), (e)(3), (e)(6), [G]63.999(e)(6)(i), (e)(6)(iv), [G]63.999(d)(1)-(2), 63.2520(d)(3), (e)(11)</i>
2	PROEO	63EEEE-01	HAPS	General High Level Applicability	General High Level Applicability	General High Level Applicability
2	<i>PROEO</i>	<i>63PPP-01</i>	<i>HAPS</i>	<i>General High-Level Applicability</i>	<i>General High-Level Applicability</i>	<i>General High-Level Applicability</i>

Texas Commission on Environmental Quality

Title V Existing

2203

Site Information (Regulated Entity)

What is the name of the permit area to be authorized?	CHEMICALS & METALS (3)
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) (##.#####)	29.4125
Longitude (W) (-###.#####)	95.944722
Primary SIC Code	2869
Secondary SIC Code	
Primary NAICS Code	325199
Secondary NAICS Code	
Regulated Entity Site Information	
What is the Regulated Entity's Number (RN)?	RN100225945
What is the name of the Regulated Entity (RE)?	DOW TEXAS OPERATIONS FREEPORT
Does the RE site have a physical address?	Yes
Physical Address	
Number and Street	2301 N BRAZOSPORT BLVD
City	FREEPORT
State	TX
ZIP	77541
County	BRAZORIA
Latitude (N) (##.#####)	28.9825
Longitude (W) (-###.#####)	-95.352777
Facility NAICS Code	
What is the primary business of this entity?	INDUSTRIAL CHEMICAL MANUFACTURING PLANT

Customer (Applicant) Information

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

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

Responsible Official Contact

Person TCEQ should contact for questions about this application:

Organization Name	THE DOW CHEMICAL COMPANY
Prefix	MR
First	JOHN
Middle	
Last	SAMPSON
Suffix	
Credentials	
Title	SENIOR VICE PRESIDENT
Enter new address or copy one from list:	
Mailing Address	
Address Type	Domestic
Mailing Address (include Suite or Bldg. here, if applicable)	2301 N BRAZOSPORT BLVD
Routing (such as Mail Code, Dept., or Attn:)	
City	FREEPORT
State	TX
ZIP	77541
Phone (###-###-####)	9792389978
Extension	
Alternate Phone (###-###-####)	
Fax (###-###-####)	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)

2101 N BRAZOSPORT BLVD

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

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.

CRYSTAL SCHMIDT(THE DOW CHEMICA...)

Organization Name

THE DOW CHEMICAL COMPANY

Prefix

MRS

First

CRYSTAL

Middle

Last

SCHMIDT

Suffix

Credentials

Title

AIR PERMIT MANAGER

Enter new address or copy one from list:

Mailing Address

Address Type

Domestic

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

332 HIGHWAY 332 E

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

City

LAKE JACKSON

State

TX

ZIP

77566

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

9792381742

Extension

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

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

E-mail

cschmidt6@dow.com

Title V General Information - Existing

1) Permit Type:

SOP

2) Permit Latitude Coordinate:

29 Deg 24 Min 45 Sec

3) Permit Longitude Coordinate:

95 Deg 56 Min 41 Sec

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

New Application

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

Streamlined Revision

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

No

through permit conversion?

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

No

5) Who will electronically sign this Title V application?

Duly Authorized Representative

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

No

Title V Attachments Existing

Attach OP-1 (Site Information Summary)

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

[File Properties]

File Name

OP_2_Form_OP-2.pdf

Hash

B9A64A4910B055F99A3B7928F87943A25C85C33F22F35DC1DCBCE237F17096F2

MIME-Type

application/pdf

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

[File Properties]

File Name

OP_REQ1_Form_OP-REQ1.pdf

Hash

DF3E2BE7D210D803BAC29A5E48712DD88B6B966FEBF54B7A216961454838A029

MIME-Type

application/pdf

Attach OP-REQ2 (Negative Applicable Requirement Determinations)

[File Properties]

File Name

OP_REQ2_Form_OP-REQ2.pdf

Hash

52089FBE9A54E906BC6C27C5482696E2E4CEAFAA7E9E54CA337F393B77F7C9D3

MIME-Type

application/pdf

Attach OP-REQ3 (Applicable Requirements Summary)

[File Properties]

File Name

OP_REQ3_Form_OP-REQ3.pdf

Hash

76BB286B8CB76C11FC13674AA1A866D1E4363133C44C6C668903E1C5F650B6EF

MIME-Type

application/pdf

Attach OP-PBRSUP (Permits by Rule Supplemental Table)

[File Properties]

File Name

OP_PBRSUP_Form_OP-PBRSUP.pdf

Hash

730FBB79792D4A0EA892FB80006FA8091E1FB050FDDF8EEB5822F9E850874A18

MIME-Type

application/pdf

Attach OP-SUMR (Individual Unit Summary for Revisions)

[File Properties]

File Name	OP_SUMR_Form_OP-SUMR.pdf
Hash	8296DDDEFF61E3A860A61C62DE7C8433171BA3856D240709A12CB4ECE096D559
MIME-Type	application/pdf

Attach OP-MON (Monitoring Requirements)

Attach OP-UA (Unit Attribute) Forms

[File Properties]

File Name	Form_OP-UAs.pdf
Hash	E78DD2F348505E71AD725ACF5AB65E735DA4FAF9AC12EC6ABCD05F3891892BF5
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	Cover_Letter.pdf
Hash	142B772CC9EF0882CCA21FE289AA0ACA3E750C734A672BB0151E4064E6DF1603
MIME-Type	application/pdf

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

Expedite Title V

1) Per Texas Health and Safety Code, Section 382.05155, does the applicant want to expedite the processing of this application?	No
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Certification

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

1. I am Fran Q Falcon, the owner of the STEERS account ER028176.
2. I have the authority to sign this data on behalf of the applicant named above.
3. I have personally examined the foregoing and am familiar with its content and the content of any attachments, and based upon my personal knowledge and/or inquiry of any individual responsible for information contained herein, that this information is true, accurate, and complete.
4. I further certify that I have not violated any term in my TCEQ STEERS participation agreement and that I have no reason to believe that the confidentiality or use of my password has been compromised at any time.
5. I understand that use of my password constitutes an electronic signature legally equivalent to my written signature.

6. I also understand that the attestations of fact contained herein pertain to the implementation, oversight and enforcement of a state and/or federal environmental program and must be true and complete to the best of my knowledge.
7. I am aware that criminal penalties may be imposed for statements or omissions that I know or have reason to believe are untrue or misleading.
8. I am knowingly and intentionally signing Title V Existing 2203.
9. My signature indicates that I am in agreement with the information on this form, and authorize its submittal to the TCEC

OWNER OPERATOR Signature: Fran Q Falcon OWNER OPERATOR

Account Number:	ER028176
Signature IP Address:	170.85.99.27
Signature Date:	2024-09-23
Signature Hash:	4725663576DE3F41DE74D82CB21CFB9BFB69E4422881212DCE899ECE17426B81
Form Hash Code at time of Signature:	317C083177E30C77E5D581590BA96E55326BD23BD7BDC23553800FCC31AFA885

Submission

Reference Number:	The application reference number is 685360
Submitted by:	The application was submitted by ER028176/Fran Q Falcon
Submitted Timestamp:	The application was submitted on 2024-09-23 at 12:27:10 CDT
Submitted From:	The application was submitted from IP address 170.85.99.27
Confirmation Number:	The confirmation number is 565460
Steers Version:	The STEERS version is 6.82
Permit Number:	The permit number is 2203

Additional Information

Application Creator: This account was created by Crystal Schmidt