

Texas Commission on Environmental Quality

Title V Existing

4393

Site Information (Regulated Entity)

What is the name of the permit area to be authorized?	MONOMERIC METHYLENE DIPHENYL DIISOCYANATE MMDI PLANT
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 (###-###-####)	
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)

332 HIGHWAY 332 E

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

City

LAKE JACKSON

State

TX

Zip

77566

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

9792389764

Extension

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

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

E-mail

txles@dow.com

Technical Contact

Person TCEQ should contact for questions about this application:

Select existing TC contact or enter a new contact.

CRYSTAL SCHMIDT(THE DOW CHEMICA...)

Organization Name

THE DOW CHEMICAL COMPANY

Prefix

MRS

First

CRYSTAL

Middle

Last

SCHMIDT

Suffix

Credentials

Title

AIR PERMIT MANAGER

Enter new address or copy one from list:

Mailing Address

Address Type

Domestic

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

332 HIGHWAY 332 E

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

City

LAKE JACKSON

State

TX

ZIP

77566

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

9792381742

Extension

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

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

E-mail

cschmidt6@dow.com

Title V General Information - Existing

1) Permit Type:

SOP

2) Permit Latitude Coordinate:

28 Deg 58 Min 57 Sec

3) Permit Longitude Coordinate:

95 Deg 21 Min 10 Sec

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

Update

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

4393-37732

5) Who will electronically sign this Title V application?

Duly Authorized Representative

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

No

Title V Attachments Existing

Attach OP-1 (Site Information Summary)

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

Attach OP-ACPS (Application Compliance Plan and Schedule)

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

Attach OP-REQ2 (Negative Applicable Requirement Determinations)

Attach OP-REQ3 (Applicable Requirements Summary)

Attach OP-PBRSUP (Permits by Rule Supplemental Table)

Attach OP-SUMR (Individual Unit Summary for Revisions)

Attach OP-MON (Monitoring Requirements)

Attach OP-UA (Unit Attribute) Forms

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

Attach OP-CRO2 (Change of Responsible Official Information)

Attach OP-DEL (Delegation of Responsible Official)

Attach Void Request Form

Attach any other necessary information needed to complete the permit.

[File Properties]

File Name

2025-10-08_OP-CRO1_O4393.pdf

Hash

6DDC6736F70DCF2B47112852B8BB90C73C204FE43D04B53A181EED17A0C07E3E

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 4393.
- 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:	136.226.100.194
Signature Date:	2025-10-08
Signature Hash:	47028DDAF3697FA5C70F77C16A06E50F53CC1EEEEAEF487D89AB53CE34D67B713
Form Hash Code at time of Signature:	9034E84C07DC79D6A9B79FE070B909B945119CFA6C5E691F5A06BEAE7603A468

Submission

Reference Number:	The application reference number is 824540
Submitted by:	The application was submitted by ER028176/Fran Q Falcon
Submitted Timestamp:	The application was submitted on 2025-10-08 at 16:24:46 CDT
Submitted From:	The application was submitted from IP address 136.226.100.194
Confirmation Number:	The confirmation number is 683881
Steers Version:	The STEERS version is 6.93
Permit Number:	The permit number is 4393

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: CN600356976
Account No.: BL-0082-R
Permit No.: O4393
Project No.: 37732
Area Name: Monomeric Methylene Diphenyl Diisocyanate (MMDI) Plant
Company Name: The Dow Chemical Company
II. Certification Type <i>(Please mark appropriate box)</i>
☐ Responsible Official Representative ☒ Duly Authorized Representative
III. Submittal Type <i>(Please mark appropriate box) (Only one response can be accepted per form)</i>
☐ SOP/TOP Initial Permit Application ☐ Permit Revision, Renewal, or Reopening
☐ GOP Initial Permit Application ☐ Update to Permit Application
☒ Other: <u>Working Draft Permit 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 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>September 16, 2025</u> to <u>October 8, 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>October 8, 2025</u>
Title: <u>Texas Regional Environmental Leader</u>

From: Schmidt, Crystal (C) <cschmidt6@dow.com>
Sent: Tuesday, September 16, 2025 1:39 PM
To: Jennifer Tenney
Subject: RE: RFI - O4393 The Dow Chemical Company (Minor, 37732)
Attachments: 2025-09-16_NOD_Response_O4393.pdf

Jennifer,

Please see our attached response and let me know if you have any questions. I will have my DAR submit via STEERS once you confirm there is nothing else needed to complete this technical review process.

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: Jennifer Tenney <Jennifer.Tenney@tceq.texas.gov>
Sent: Friday, September 12, 2025 2:06 PM
To: Schmidt, Crystal (C) <cschmidt6@dow.com>
Subject: RFI - O4393 The Dow Chemical Company (Minor, 37732)

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

Team leader review found a couple more updates that need to be made. Please respond to this email by **Thursday, September 18, 2025.**

Form OP-PBR SUP - after updates are made, please make sure to update the date in all four tables and send in all 4 tables as a set.

- Table A and Table D— regarding PBR Registration numbers that have been voided

- Unit ID No. A20MDFU1 – PBR Registration No. 175019 – please strike out this entry as it is void and replaced by 177513 and 178317.
- Unit ID Nos. A20MDST12A and A20MDST12B – PBR Registration No. 175036 is void and can be updated at this time with the current PBR Registration No.
- Unit ID Nos. A20MDLRPL and A20MDV2550– PBR Registration No. 169717 is void and can be updated at this time with the current PBR Registration No.

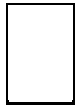
FORM OP-SUMR - will need to be updated for whichever Unit ID Nos. have resulting changes in their preconstruction authorizations.

FORM OP-REQ1 – there is a later authorization date for NSR Authorization No. 153832. Please submit Form OP-REQ1 Page 89 with the updated date.

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.

Thanks
Jen

Jennifer Tenney
Environmental Permit Specialist II
TCEQ – APD – OP Section (Title V)
(512) 239-1830



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



September 16, 2025

E-MAIL RESPONSE

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

The Dow Chemical Company, CN600356976
Monomeric Methylene Diphenyl Diisocyanate (MMDI) Plant, RN100225945
Title V Operating Permit WDP Response for MMDI Plant, O4393
TCEQ Project Number: 37732

Dear Mr. Tenney,

The Dow Chemical Company (Dow) is providing a response to the Notice of Deficiency (NOD) items provided on September 12, 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 Health Department

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

Additional Information Request

Item 1	Form OP-PBRSUP - after updates are made, please make sure to update the date in all four tables and send in all 4 tables as a set. • Table A and Table D– regarding PBR Registration numbers that have been voided - o Unit ID No. A20MDFU1 – PBR Registration No. 175019 – please strike out this entry as it is void and replaced by 177513 and 178317. - o Unit ID Nos. A20MDST12A and A20MDST12B – PBR Registration No. 175036 is void and can be updated at this time with the current PBR Registration No. - o Unit ID Nos. A20MDLRPL and A20MDV2550– PBR Registration No. 169717 is void and can be updated at this time with the current PBR Registration No.
Item 1 Response	Please see Form OP-PBRSUP for more information.
Item 2	FORM OP-SUMR - will need to be updated for whichever Unit ID Nos. have resulting changes in their preconstruction authorizations.
Item 2 Response	Please see Form OP-SUMR for more information.
Item 3	FORM OP-REQ1 – there is a later authorization date for NSR Authorization No. 153832. Please submit Form OP-REQ1 Page 89 with the updated date.
Item 3 Response	Please see Form OP-REQ1 (Page 89 only) for more information.

Federal Operating Permit Program
Form OP-SUMR – Individual Unit Summary for Revisions
Table 1

Date	Permit No.	Regulated Entity No.
September 16, 2025	O4393	RN10025945

Unit/Process AI	Unit/Process Revision No.	Unit/Process ID No.	Unit/Process Applicable Form	Unit/Process Name/ Description	Unit/ Process CAM	Preconstruction Authorizations 30 TAC Chapter 116/ 30 TAC Chapter 106	Preconstruction Authorizations Title I
		A20MDFU1	OP-UA1 OP-UA12	AREA FUGITIVES		153832 106.261/11/01/2003 [175019 , 177513, 178317] 106.262/11/01/2003 [177513]	
		A20MDLRPL	OP-UA4	SPOT #1 & #2 TRUCK LOADING RACK		153832 106.472/09/04/2000 [169717]	
		A20MDST12A	OP-UA15	PURE MDI ANTI-OXIDANT SHOT POT		153832 106.124/09/04/2000 106.262/11/01/2003 [175036]	
		A20MDST12B	OP-UA15	PURE MDI ANTI-OXIDANT SHOT POT		153832 106.124/09/04/2000 106.262/11/01/2003 [175036]	
		A20MD2550	OP-UA3	STORAGE TANK		153832 106.472/09/04/2000 [169717]	

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

Date	Permit No.	Regulated Entity No.
September 16, 2025	O4393	RN10025945

For SOP applications, answer ALL questions unless otherwise directed.

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

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

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

Authorization No.	Issuance Date	Authorization No.	Issuance Date	Authorization No.	Issuance Date
153832	03/24/2025 09/29/2023				

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

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

PBR No.	Version No./Date	PBR No.	Version No./Date	PBR No.	Version No./Date
106.124	09/04/2000				
106.261	11/01/2003				
106.262	11/01/2003				
106.263	11/01/2001				
106.472	09/04/2000				

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

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

Permit By Rule Supplemental Table
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 16, 2025	O4393	RN100225945

Unit ID No.	Registration No.	PBR No.	Registration Date
A20MDST12A A20MDST12B	175036	106.262	02/08/2024
A20MDFU1	175019	106.261	01/12/2024
A20MDLRPL A20MD2550	169717	106.472	08/02/2022
A20MDFU1	177513	106.261 106.262	10/01/2024
A20MDFU1	178317	106.261	12/10/2024

Permit By Rule Supplemental Table (Page 2 continued)
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 16, 2025	O4393	RN100225945

Unit ID No.	PBR No.	Version No./Date
PROMMDI	106.263	11/01/2001
A20MDST12A A20MDST12B	106.124	09/04/2000
A20MDLRPL A20MDUL1B A20MDV800	106.472	09/04/2000

Permit By Rule Supplemental Table (Page 3 continued)
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 16, 2025	O4393	RN100225945

PBR No.	Version No./Date
N/A	N/A

Permit By Rule Supplemental Table (Page 4 continued)
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 16, 2025	O4393	RN100225945

Unit ID No.	PBR No.	Version No./Date Or Registration No.	Monitoring Requirement
A20MDST12A A20MDST12B	106.262	175036	Maintain PBR documentation
A20MDFU1	106.261	175019	New piping components are managed in accordance with the current Leak Detection and Repair (LDAR) fugitive monitoring program 28MID, 28AVO, and 28PI as required by NSR Permit 153832 SC #16, #17, and #18 (Issued March 24, 2025)
A20MDLRPL A20MD2550	106.472	169717	Transfer rack will continue to meet the monitoring and recordkeeping requirements as required by NSR Permit 153832 SC #10 (Issued March 24, 2025) Tank will continue to meet the monitoring and recordkeeping requirements as required by NSR Permit 153832 SC #8 (Issued March 24, 2025)
A20MDFU1	106.261 106.262	177513	New piping components are managed in accordance with the current Leak Detection and Repair (LDAR) fugitive monitoring program 28MID, 28AVO, and 28PI as required by NSR Permit 153832 SC #16, #17, and #18 (Issued March 24, 2025)
A20MDFU1	106.261	178317	New piping components are managed in accordance with the current Leak Detection and Repair (LDAR) fugitive monitoring program 28MID, 28AVO, and 28PI as required by NSR Permit 153832 SC #16, #17, and #18 (Issued March 24, 2025)
PROMMDI	106.263	11/01/2001	Track emissions on a rolling 12-month basis
A20MDST12A A20MDST12B	106.124	09/04/2000	Maintain PBR documentation
A20MDLRPL A20MDUL1B A20MDV800	106.472	09/04/2000	Maintain records of annual throughput as required by NSR Permit 153832 (Issued March 24, 2025)

Texas Commission on Environmental Quality

Title V Existing

4393

Site Information (Regulated Entity)

What is the name of the permit area to be authorized?	MONOMERIC METHYLENE DIPHENYL DIISOCYANATE MMDI PLANT
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 (###-###-####)	
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)	332 HIGHWAY 332 E
Routing (such as Mail Code, Dept., or Attn:)	
City	LAKE JACKSON
State	TX
Zip	77566
Phone (###-###-####)	9792389764
Extension	
Alternate Phone (###-###-####)	
Fax (###-###-####)	
E-mail	txles@dow.com

Technical Contact

Person TCEQ should contact for questions about this application:

Select existing TC contact or enter a new contact.

CRYSTAL SCHMIDT(THE DOW CHEMICA...)

Organization Name

THE DOW CHEMICAL COMPANY

Prefix

MRS

First

CRYSTAL

Middle

Last

SCHMIDT

Suffix

Credentials

Title

AIR PERMIT MANAGER

Enter new address or copy one from list:

Mailing Address

Address Type

Domestic

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

332 HIGHWAY 332 E

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

City

LAKE JACKSON

State

TX

ZIP

77566

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

9792381742

Extension

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

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

E-mail

cschmidt6@dow.com

Title V General Information - Existing

1) Permit Type:

SOP

2) Permit Latitude Coordinate:

28 Deg 58 Min 57 Sec

3) Permit Longitude Coordinate:

95 Deg 21 Min 10 Sec

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

Update

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

4393-37732

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

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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]

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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 4393.
9. My signature indicates that I am in agreement with the information on this form, and authorize its submittal to the TCEC

OWNER OPERATOR Signature: Fran Q Falcon OWNER OPERATOR

Account Number:	ER028176
Signature IP Address:	165.225.32.246
Signature Date:	2025-08-14
Signature Hash:	47028DDAF3697FA5C70F77C16A06E50F53CC1EEEEAEF487D89AB53CE34D67B713
Form Hash Code at time of Signature:	34C8FA28609C9E50B993817B013CD1C62D499C34A5466DEEE0674FA3E5AA8516

Submission

Reference Number:	The application reference number is 809187
Submitted by:	The application was submitted by ER028176/Fran Q Falcon
Submitted Timestamp:	The application was submitted on 2025-08-14 at 13:49:06 CDT
Submitted From:	The application was submitted from IP address 165.225.32.246
Confirmation Number:	The confirmation number is 671384
Steers Version:	The STEERS version is 6.92
Permit Number:	The permit number is 4393

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: CN600356976
Account No.: BL-0082-R
Permit No.: O4393
Project No.: 37732
Area Name: Monomeric Methylene Diphenyl Diisocyanate (MMDI) Plant
Company Name: The Dow Chemical Company
II. Certification Type <i>(Please mark appropriate box)</i>
☐ Responsible Official Representative ☒ Duly Authorized Representative
III. Submittal Type <i>(Please mark appropriate box) (Only one response can be accepted per form)</i>
☐ SOP/TOP Initial Permit Application ☐ Permit Revision, Renewal, or Reopening
☐ GOP Initial Permit Application ☐ Update to Permit Application
☒ Other: <u>Working Draft Permit 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 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>July 17, 2025</u> to <u>August 14, 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>August 14, 2025</u>
Title: <u>Texas Regional Environmental Leader</u>

From: Schmidt, Crystal (C) <cschmidt6@dow.com>
Sent: Tuesday, August 12, 2025 1:24 PM
To: Jennifer Tenney
Subject: RE: Working Draft Permit -- FOP O4393/Project 37732, The Dow Chemical Company/Monomeric Methylene Diphenyl Diisocyanate (MMDI) Plant

Jennifer,

Dow approves of this draft. I will work on getting you an OP-CRO1 via STEERS by the end of the week. 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: Jennifer Tenney <Jennifer.Tenney@tceq.texas.gov>
Sent: Friday, August 8, 2025 1:57 PM
To: Schmidt, Crystal (C) <cschmidt6@dow.com>
Subject: RE: Working Draft Permit -- FOP O4393/Project 37732, The Dow Chemical Company/Monomeric Methylene Diphenyl Diisocyanate (MMDI) Plant

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

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

Thanks Crystal.

Please let me know if you accept the attached permit, with the typo corrected.

Thanks
Jen

From: Schmidt, Crystal (C) <cschmidt6@dow.com>
Sent: Friday, August 8, 2025 12:08 PM
To: Jennifer Tenney
Subject: RE: Working Draft Permit -- FOP O4393/Project 37732, The Dow Chemical Company/Monomeric Methylene Diphenyl Diisocyanate (MMDI) Plant
Attachments: 2025-08-08_WDP_Response_O4393.pdf

Jennifer,

I apologize for the one day delay; my specialist was on vacation. 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: Jennifer Tenney <Jennifer.Tenney@tceq.texas.gov>
Sent: Thursday, July 17, 2025 11:20 AM
To: Schmidt, Crystal (C) <cschmidt6@dow.com>
Subject: W: Working Draft Permit -- FOP O4393/Project 37732, The Dow Chemical Company/Monomeric Methylene Diphenyl Diisocyanate (MMDI) Plant

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

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

Good Morning,

I have conducted a technical review of revision application for The Dow Chemical Company, Monomeric Methylene Diphenyl Diisocyanate (MMDI) Plant. An electronic copy of the Working Draft Permit (WDP) is attached for your review. This WDP contains the TCEQ determination of



August 8, 2025

E-MAIL RESPONSE

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

The Dow Chemical Company, CN600356976
Monomeric Methylene Diphenyl Diisocyanate MMDI Plant, RN100225945
Title V Operating Permit WDP Response for O4393
TCEQ Project Number: 37732

Dear Ms. Tenney,

The Dow Chemical Company (Dow) is providing comments on the Working Draft Permit provided on July 17, 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

Working Draft Permit (WDP) Comments

Permit Face

1. Please update the permit area name from “Monomeric Methylene Diphenyl Diisocyanate MMSI Plant” to “Monomeric Methylene Diphenyl Diisocyanate MMDI Plant”.

From: Jennifer Tenney
Sent: Thursday, July 17, 2025 11:20 AM
To: cschmidt6@dow.com
Subject: W: Working Draft Permit -- FOP O4393/Project 37732, The Dow Chemical Company/Monomeric Methylene Diphenyl Diisocyanate (MMDI) Plant
Attachments: WDP - O4393 The Dow Chemical Company (Revision, 37732).docx

Good Morning,

I have conducted a technical review of revision application for The Dow Chemical Company, Monomeric Methylene Diphenyl Diisocyanate (MMDI) Plant. An electronic copy of the Working Draft Permit (WDP) is attached for your review. This WDP contains the TCEQ determination of applicable requirements based on the information submitted in your application, and any updates provided.

Please review the WDP and submit to me any comments you have or approval of the working draft permit by **Thursday August 7, 2025**.

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

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

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

Please notify me when these updates have been submitted.

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

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

Thank you for your cooperation.

Sincerely,
Jen

Jennifer Tenney
Environmental Permit Specialist II
TCEQ – APD – OP Section (Title V)
(512) 239-1830



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

From: Jennifer Tenney
Sent: Wednesday, April 2, 2025 8:54 AM
To: cschmidt6@dow.com
Subject: Technical Review -- FOP O4393/Project 37732, The Dow Chemical Company/Monomeric Methylene Diphenyl Diisocyanate (MMDI) Plant

Good Morning,

I have been assigned to the Federal Operating Permit (FOP) revision application of Permit No. O4393 for The Dow Chemical Company, Monomeric Methylene Diphenyl Diisocyanate (MMDI) Plant. This application has been assigned Project No. 37732. 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.

Please note that the site name currently in the database is Monomeric Methylene Diphenyl Diisocyanate (MMDI) Plant. Please let me know if this is correct or submit and OP-1 with the correct site name.

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 any 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,

Jennifer Tenney

Environmental Permit Specialist I
OA/Air Permits Division/OP Section
Texas Commission on Environmental Quality
MC-163, P.O. Box 13087
Austin, TX 78711-3087
jennifer.tenney@tceq.texas.gov

Phone: (512) 239-1830

Fax: (512) 239-1400



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

Texas Commission on Environmental Quality

Title V Existing

4393

Site Information (Regulated Entity)

What is the name of the permit area to be authorized?	MONOMERIC METHYLENE DIPHENYL DIISOCYANATE MMDI PLANT
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 (###-###-####)	
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)

332 HIGHWAY 332 E

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

City

LAKE JACKSON

State

TX

Zip

77566

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

9792389764

Extension

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

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

E-mail

txles@dow.com

Technical Contact

Person TCEQ should contact for questions about this application:

Select existing TC contact or enter a new contact.

CRYSTAL SCHMIDT(THE DOW CHEMICA...)

Organization Name

THE DOW CHEMICAL COMPANY

Prefix

MRS

First

CRYSTAL

Middle

Last

SCHMIDT

Suffix

Credentials

Title

AIR PERMIT MANAGER

Enter new address or copy one from list:

Mailing Address

Address Type

Domestic

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

332 HIGHWAY 332 E

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

City

LAKE JACKSON

State

TX

ZIP

77566

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

9792381742

Extension

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

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

E-mail

cschmidt6@dow.com

Title V General Information - Existing

1) Permit Type:

SOP

2) Permit Latitude Coordinate:

28 Deg 58 Min 57 Sec

3) Permit Longitude Coordinate:

95 Deg 21 Min 10 Sec

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

New Application

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

Streamlined Revision

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

No

through permit conversion?

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

No

5) Who will electronically sign this Title V application?

Duly Authorized Representative

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

No

Title V Attachments Existing

Attach OP-1 (Site Information Summary)

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

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 any other necessary information needed to complete the permit.

[File Properties]

File Name

2025-02-28_Minor_Revision_O4393.pdf

Hash

54826983B943E80779E4309C73490BDB6A6550556CB8AECAFC124982F247B51

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 4393.
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:	2025-02-28
Signature Hash:	47028DDAF3697FA5C70F77C16A06E50F53CC1EEEEAEF487D89AB53CE34D67B713
Form Hash Code at time of Signature:	C5F76512609CD8DF421F5B3FE5C1F2A9522AA12CCFBAEEEE2CEE7D9DA1D81AE7

Submission

Reference Number:	The application reference number is 765850
Submitted by:	The application was submitted by ER028176/Fran Q Falcon
Submitted Timestamp:	The application was submitted on 2025-02-28 at 09:40:06 CST
Submitted From:	The application was submitted from IP address 170.85.99.3
Confirmation Number:	The confirmation number is 635769
Steers Version:	The STEERS version is 6.88
Permit Number:	The permit number is 4393

Additional Information

Application Creator: This account was created by Crystal Schmidt



February 28, 2025

Electronic Submittal via ePermits

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
Monomeric Methylene Diphenyl Diisocyanate (MMD) Plant – Title V Operating Permit O4393
Permit Minor Revision Application

To Whom it May Concern,

The Dow Chemical Company is submitting the Title V Operating Permit O4393 Minor Revision Application for the Monomeric Methylene Diphenyl Diisocyanate (MMD) Plant 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

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

Date: February 28, 2025	
Permit No.: O4393	
Regulated Entity No.: RN100225945	
Company Name: The Dow Chemical Company	
For Submissions to EPA	
Has an electronic copy of this application been submitted (or is being submitted) to EPA? ☒ YES ☐ NO	
I. Application Type	
Indicate the type of application:	
☐ Renewal	
☒ Streamlined Revision (Must include provisional terms and conditions as explained in the instructions.)	
☐ Significant Revision	
☐ Revision Requesting Prior Approval	
☐ Administrative Revision	
☐ Response to Reopening	
II. Qualification Statement	
For SOP Revisions Only ☒ YES ☐ NO	
For GOP Revisions Only ☐ YES ☐ NO	

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

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

Indicate all pollutants for which the site is a major source based on the site's potential to emit:
(Check the appropriate box[es].)

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

Other:

IV. Reference Only Requirements (For reference only)

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

V. Delinquent Fees and Penalties

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

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

Date:	February 28, 2025					
Permit No.:	O4393					
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	A20MDT920	OP-UA15	N/A	Please update the Alternate Monitoring Parameters (AMP) question from “YES” to “NO” on Form OP-UA15/Table 6c (40 CFR Part 63, Subpart G)
2	MS-C	NO	A20MDFU1	OP-SUMR OP-PBRSUP	N/A	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). 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.
February 28, 2025	O4393	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	A20MDFU1	OP-UA12	AREA FUGITIVES		153832 106.261/11/01/2003 [175019, 177513, 178317 106.262/11/01/2003 [177513]	
	1	A20MDT920	OP-UA15	T-290 DISTILLATION TOWER		153832	

Emission Point/Stationary Vent/Distillation Operation Vent/Process Vent Attributes – Form OP-UA15 (Page 13)
Federal Operating Permit Program

Table 6a: 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 Process Vents

Date	Permit No.	Regulated Entity No.
February 28, 2025	O4393	RN100225945

Emission Point ID No.	SOP Index No.	Overlap	Group 1	Regulation	HAP Concentration	Flow Rate	Electing Control	NSPS TRE Index Value	MACT TRE Index Value	Plant Type
A20MDT920	63G-02	NNN	YES							

Emission Point/Stationary Vent/Distillation Operation Vent/Process Vent Attributes – Form OP-UA15 (Page 14)
Federal Operating Permit Program

Table 6b: 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 Process Vents

Date	Permit No.	Regulated Entity No.
February 28, 2025	O4393	RN100225945

Emission Point ID No.	SOP Index No.	Control Device	Control Device ID No.	Halogenated	TRE for Halogenated Vent Stream	Halogen Reduction Device	Installation Date	Performance Test
A20MDT920	63G-02	FLARE	A36MDF532	YES				YES

Emission Point/Stationary Vent/Distillation Operation Vent/Process Vent Attributes – Form OP-UA15 (Page 15)
Federal Operating Permit Program

Table 6c: 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 Process Vents

Date	Permit No.	Regulated Entity No.
February 28, 2025	O4393	RN100225945

Emission Point ID No.	SOP Index No.	Alternate Monitoring Parameters (AMP)	AMP ID No.	Continuous Monitoring	Continuous Monitoring Alt ID No.	Bypass Lines	Flow Indicator
A20MDT920	63G-02	YES NO		NOALT		NO	

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

Date: February 28, 2025	Regulated Entity No.: RN100225945	Permit No.: O4393
Company Name: The Dow Chemical Company	Area Name: Monomeric Methylene Diphenyl Diisocyanate (MMD) Plant	

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	A20MDT920	OP-UA15	63G-02	HAPS	40 CFR Part 63, Subpart G	[G]63.113(a)(1), 63.11, 63.113(c)(2), (h), [G]63.115(f)

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

Date: February 28, 2025	Regulated Entity No.: RN100225945	Permit No.: O4393
Company Name: The Dow Chemical Company	Area Name: Monomeric Methylene Diphenyl Diisocyanate (MMD) Plant	

Revision No.	Unit/Group/Process ID No.	SOP/GOP Index No.	Pollutant	Monitoring and Testing Requirements	Recordkeeping Requirements	Reporting Requirements
1	A20MDT920	63G-02	HAPS	63.114(c), (e), 63.114(a), (a)(2), [G]63.115(d)(2)(v), [G](f), [G]63.116(a)	[G]63.117(a)(5), 63.118(a)(1), (a)(2), [G]63.152(a), [G](f)	63.114(c), (e), 63.117(e) (f), [G]63.117(a)(5), (f), 63.118(f)(2), 63.118(f)(5), [G]63.151(b), (e), [G]63.151(e)(1), (e)(2)-(3), (e)(5), 63.151(f), 63.151(f)(1)-(3), (h), [G]63.151(j), [G]63.152(a), (b), [G]63.152(b)(1)-(2), (c)(1), (c)(2), 63.152(c)(2)(i), [G](c)(2)(ii), 63.152(c)(2)(iii), (c)(4)(ii), [G]63.152(c)(6)

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 28, 2025	O4393	RN100225945

Unit ID No.	Registration No.	PBR No.	Registration Date
A20MDST12A A20MDST12B	175036	106.262	02/08/2024
A20MDFU1	175019	106.261	01/12/2024
A20MDLRPL A20MDV2550	169717	106.472	08/02/2022
A20MDFU1	177513	106.261 106.262	10/01/2024
A20MDFU1	178317	106.261	12/10/2024

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
February 28, 2025	O4393	RN100225945

Unit ID No.	PBR No.	Version No./Date
PROMMDI	106.263	11/01/2001
A20MDST12A A20MDST12B	106.124	09/04/2000
A20MDLRPL A20MDUL1B A20MDV800	106.472	09/04/2000

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

Date	Permit Number	Regulated Entity Number
February 28, 2025	O4393	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 28, 2025	O4393	RN100225945

Unit ID No.	PBR No.	Version No./Date Or Registration No.	Monitoring Requirement
PROMMDI	106.263	11/01/2001	Track emissions on a rolling 12-month basis
A20MDST12A A20MDST12B	106.124	09/04/2000	Maintain PBR documentation
A20MDLRPL A20MDUL1B A20MDV800	106.472	09/04/2000	Maintain records of annual throughput as required by NSR Permit 153832 (Issued 05/31/2022)
A20MDST12A A20MDST12B	106.262	175036	Maintain PBR documentation
A20MDFU1	106.261	175019	New piping components are managed in accordance with the current Leak Detection and Repair (LDAR) fugitive monitoring program 28MID, 28AVO, and 28PI as required by NSR Permit 153832 SC #16, #17, and #18 (Issued 05/31/2022)
A20MDLRPL A20MDV2520	106.472	169717	Transfer rack will continue to meet the monitoring and recordkeeping requirements as required by NSR Permit 153832 SC #10 (Issued 05/31/2022) Tank will continue to meet the monitoring and recordkeeping requirements as required by NSR Permit 153832 SC #8 (Issued 05/31/2022)
A20MDFU1	106.261 106.262	177513	<i>New piping components are managed in accordance with the current Leak Detection and Repair (LDAR) fugitive monitoring program 28MID, 28AVO, and 28PI as required by NSR Permit 153832 SC #16, #17, and #18 (Issued 05/31/2022)</i>
A20MDFU1	106.261	178317	<i>New piping components are managed in accordance with the current Leak Detection and Repair (LDAR) fugitive monitoring program 28MID, 28AVO, and 28PI as required by NSR Permit 153832 SC #16, #17, and #18 (Issued 05/31/2022)</i>