

**From:** eNotice TCEQ  
**Sent:** Thursday, April 17, 2025 10:45 AM  
**To:** Lois.Kolkhorst@senate.texas.gov; JM.lozano@house.texas.gov  
**Subject:** TCEQ Notice - Permit Number O2026  
**Attachments:** 20250417 - Leg Letters O2026\_38034.pdf

This email is being sent to electronically transmit an official document issued by the Office of Air of the Texas Commission on Environmental Quality.

This email is being sent to you because either (a) you filed a document with the Office of the Chief Clerk that made you part of the official mailing list for the above referenced matter, or (b) notice to you is legally required. As authorized by Texas Water Code 5.128, this electronic transmittal is replacing the previous practice of hard copy distribution. Amendments to Texas Government Code 552.137 prompted a change to the agency's privacy policy regarding confidentiality of certain email addresses. The revised privacy policy can be viewed at [http://www.tceq.state.tx.us/help/policies/electronic\\_info\\_policy.html](http://www.tceq.state.tx.us/help/policies/electronic_info_policy.html).

Questions regarding this email may be submitted either by replying directly to this email or by calling Mr. Jesse Chacon, P.E. with the Air Permits Division at (512) 239-5759.

The attached document is provided in an Adobe Acrobat .pdf format. If you cannot display the attachment, you may need to visit the Adobe web site (<http://get.adobe.com/reader>) to download the free Adobe Acrobat Reader software.

Brooke T. Paup, *Chairwoman*  
Bobby Janecka, *Commissioner*  
Catarina R. Gonzales, *Commissioner*  
Kelly Keel, *Executive Director*



## TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

*Protecting Texas by Reducing and Preventing Pollution*

April 17, 2025

THE HONORABLE LOIS KOLKHORST  
TEXAS SENATE  
PO BOX 12068  
AUSTIN TX 78711-2068

Re: Accepted Federal Operating Permit Renewal Application  
Project Number: 38034  
Permit Number: O2026  
Union Carbide Corporation  
High Pressure II Unit  
Seadrift, Calhoun County  
Regulated Entity Number: RN102181526  
Customer Reference Number: CN601688781

Dear Senator Kolkhurst:

This letter notifies you that the Texas Commission on Environmental Quality has received a federal operating permit (FOP) renewal application for a site located in your district. As part of this permitting process, the applicant is required to publish a formal newspaper public notice. The notice will inform the public of their right to make comments or request a public hearing. This link to an electronic map of the site or facility's general location is provided as a public courtesy and not part of the application or notice. For exact location, refer to application. <https://gisweb.tceq.texas.gov/LocationMapper/?marker=-96.771666,28.515&level=13>.

The FOP program regulates both new and existing major sources of emissions. The goal of the program is to improve air quality in Texas through increased compliance by codifying existing applicable regulatory requirements into the FOP. The FOP provides the applicant authorization to operate the equipment at the site. The FOP identifies and codifies air emission requirements (known as applicable requirements) that apply to the emission units at the site. The FOP does not authorize construction of emission units or emissions from those units. The New Source Review (NSR) permit is the mechanism for these authorizations.

The Honorable Lois Kolkhorst  
Page 2  
April 17, 2025

Re: Accepted Federal Operating Permit Renewal Application

This letter is being sent to you for information only and no action is required. If you need further information, please contact me at (512) 239-1250.

Sincerely,

A handwritten signature in black ink, appearing to read "Samuel Short", followed by a long horizontal line extending to the right.

Samuel Short, Deputy Director  
Air Permits Division  
Office of Air  
Texas Commission on Environmental Quality

Brooke T. Paup, *Chairwoman*  
Bobby Janecka, *Commissioner*  
Catarina R. Gonzales, *Commissioner*  
Kelly Keel, *Executive Director*



## TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

*Protecting Texas by Reducing and Preventing Pollution*

April 17, 2025

THE HONORABLE JOSE M LOZANO  
TEXAS HOUSE OF REPRESENTATIVES  
PO BOX 2910  
AUSTIN TX 78768-2910

Re: Accepted Federal Operating Permit Renewal Application  
Project Number: 38034  
Permit Number: O2026  
Union Carbide Corporation  
High Pressure II Unit  
Seadrift, Calhoun County  
Regulated Entity Number: RN102181526  
Customer Reference Number: CN601688781

Dear Representative Lozano:

This letter notifies you that the Texas Commission on Environmental Quality has received a federal operating permit (FOP) renewal application for a site located in your district. As part of this permitting process, the applicant is required to publish a formal newspaper public notice. The notice will inform the public of their right to make comments or request a public hearing. This link to an electronic map of the site or facility's general location is provided as a public courtesy and not part of the application or notice. For exact location, refer to application. <https://gisweb.tceq.texas.gov/LocationMapper/?marker=-96.771666,28.515&level=13>.

The FOP program regulates both new and existing major sources of emissions. The goal of the program is to improve air quality in Texas through increased compliance by codifying existing applicable regulatory requirements into the FOP. The FOP provides the applicant authorization to operate the equipment at the site.

This letter is being sent to you for information only and no action is required. If you need further information, please contact me at (512) 239-1250.

Sincerely,

A handwritten signature in black ink, appearing to read "Samuel Short", followed by a long horizontal line.

Samuel Short, Deputy Director  
Air Permits Division  
Office of Air  
Texas Commission on Environmental Quality

**From:** Pena, Shawn (S) <Shawn.Pena@dow.com>  
**Sent:** Thursday, April 17, 2025 10:24 AM  
**To:** Miguel Gallegos  
**Subject:** RE: Union Carbide Corporation - Renewal of SOP O2026, Project 38034  
**Attachments:** Form OP-1.pdf

Miguel,

Attached is an updated OP-1 block X.B with the complete street address from the TCEQ central registry. I also added that address to block X.C.

Please let me know if that addresses your comment or if any additional information is needed.

Regards,  
Shawn Pena  
Environmental Specialist

General Business

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**From:** Miguel Gallegos <miguel.gallegos@tceq.texas.gov>  
**Sent:** Thursday, April 17, 2025 9:19 AM  
**To:** Pena, Shawn (S) <Shawn.Pena@dow.com>  
**Subject:** RE: Union Carbide Corporation - Renewal of SOP O2026, Project 38034

**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.

P.O. boxes are not used for site/facility location data in TCEQ records, so that is not taken into account. I can enter a full address in our database even when it cannot be verified using USPS.com so long as I can also find it in online maps. The problem with your address is that it did not provide a complete street address. Please enter the complete address shown in your email below in the OP-1 form and email the corrected OP-1 directly to me as soon as possible. Thanks!

## Miguel Gallegos

Texas Commission on Environmental Quality  
Office of Air, Air Permits Division  
Air Permits Initial Review Team (APIRT)  
12100 Park 35 Circle, MC-161, Austin, Texas 78753-1808  
Tel: (512) 239-1185, eFax: (512) 239-1400  
Email: [miguel.gallegos@tceq.texas.gov](mailto:miguel.gallegos@tceq.texas.gov)



General Business

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**From:** Pena, Shawn (S) <[Shawn.Pena@dow.com](mailto:Shawn.Pena@dow.com)>  
**Sent:** Wednesday, April 16, 2025 5:55 PM  
**To:** Miguel Gallegos <[miguel.gallegos@tceq.texas.gov](mailto:miguel.gallegos@tceq.texas.gov)>  
**Subject:** RE: Union Carbide Corporation - Renewal of SOP O2026, Project 38034

Miguel,

For the OP-1 form, we typically use the street address from the TCEQ central registry which is:

**7501** State Highway 185 N  
Seadrift, TX 77983

The coordinates are associated with that street address for Seadrift, TX with a 77983-zip code. The PO Box is associated with the Port Lavaca, TX with a 77979-zip code.

I can change the OP-1 Form Block X.B to read that street address. We normally don't add driving directions to Block X.C and just repeat the street address. Will that address your request?

Regards,  
Shawn Pena  
Environmental Specialist

General Business

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**From:** Miguel Gallegos <[miguel.gallegos@tceq.texas.gov](mailto:miguel.gallegos@tceq.texas.gov)>  
**Sent:** Wednesday, April 16, 2025 4:30 PM  
**To:** Pena, Shawn (S) <[Shawn.Pena@dow.com](mailto:Shawn.Pena@dow.com)>  
**Subject:** FW: Union Carbide Corporation - Renewal of SOP O2026, Project 38034  
**Importance:** High

**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.

Shawn,

Block X.B of your OP-1 form must be a physical address and not a post office box. If the physical location address cannot be verified using USPS.com then you will skip that block and add driving directions to block X.C of the OP-1 form. Driving directions must start from the nearest major intersection of the nearest city or town and guide a driver to the site/facility. Ensure one road connects to the next road identified until arrival at the destination. Shorten with abbreviations if too lengthy.

**Example:** "FROM INTX OF HWY 59 N AND FM 2987, GO N \_\_ MILES ON FM 2987 TO COLETO CREEK DR. TURN R ON COLETO CREEK DR AND GO \_\_ MILES TO SITE ON THE LEFT."

Also, the site coordinates you have provided point to a site location within zip code 77979. Why are there two different nearest cities and zip codes in section X of the OP-1?

please email a corrected OP-1 form directly to me as soon possible. Thank you.

## Miguel Gallegos

Texas Commission on Environmental Quality  
Office of Air, Air Permits Division  
Air Permits Initial Review Team (APIRT)  
12100 Park 35 Circle, MC-161, Austin, Texas 78753-1808  
Tel: (512) 239-1185, eFax: (512) 239-1400  
Email: [miguel.gallegos@tceq.texas.gov](mailto:miguel.gallegos@tceq.texas.gov)



General Business

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**From:** Pena, Shawn (S) <[Shawn.Pena@dow.com](mailto:Shawn.Pena@dow.com)>  
**Sent:** Wednesday, April 16, 2025 1:49 PM  
**To:** Miguel Gallegos <[miguel.gallegos@tceq.texas.gov](mailto:miguel.gallegos@tceq.texas.gov)>  
**Cc:** Jasmine Yuan <[Jasmine.Yuan@tceq.texas.gov](mailto:Jasmine.Yuan@tceq.texas.gov)>; Lyons, Heather (She/Her) (H) <[HLyons@dow.com](mailto:HLyons@dow.com)>  
**Subject:** RE: Union Carbide Corporation - Renewal of SOP O2026, Project 38034

Miguel,

Attached are the OP-1, OP-2 and OP-ACPS forms for the SOP O2026 renewal project 38034. Please let me know if you have any questions or if you need any additional information.

Regards,  
Shawn Pena  
Environmental Specialist  
361-553-3401

General Business

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**From:** Miguel Gallegos <[miguel.gallegos@tceq.texas.gov](mailto:miguel.gallegos@tceq.texas.gov)>  
**Sent:** Tuesday, April 15, 2025 3:29 PM  
**To:** Pena, Shawn (S) <[Shawn.Pena@dow.com](mailto:Shawn.Pena@dow.com)>  
**Cc:** Jasmine Yuan <[Jasmine.Yuan@tceq.texas.gov](mailto:Jasmine.Yuan@tceq.texas.gov)>; Lyons, Heather (She/Her) (H) <[HLyons@dow.com](mailto:HLyons@dow.com)>  
**Subject:** FW: Union Carbide Corporation - Renewal of SOP O2026, Project 38034

**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.

Shawn,

Applications/Projects are processed separately in our Title V database and cannot be combined. Application materials received with each STEERS submission are regarded as being for that one action type alone. In this case a renewal application. The revision project is being processed as a separate project within the Air Permits Division. The technical reviewer may combine data from both applications in their permit correspondence and documents but the two projects cannot be processed in combination with each other while passing through the Air Permits Initial Review Team where I am. All of

the application materials required for a renewal application must be submitted together at the time the renewal application is submitted as attachments to the STEERS submittal or the application is considered to be incomplete and cannot be accepted.

## **Miguel Gallegos**

Texas Commission on Environmental Quality  
Office of Air, Air Permits Division  
Air Permits Initial Review Team (APIRT)  
12100 Park 35 Circle, MC-161, Austin, Texas 78753-1808  
Tel: (512) 239-1185, eFax: (512) 239-1400  
Email: [miguel.gallegos@tceq.texas.gov](mailto:miguel.gallegos@tceq.texas.gov)



### General Business

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**From:** Pena, Shawn (S) <[Shawn.Pena@dow.com](mailto:Shawn.Pena@dow.com)>  
**Sent:** Tuesday, April 15, 2025 3:02 PM  
**To:** Miguel Gallegos <[miguel.gallegos@tceq.texas.gov](mailto:miguel.gallegos@tceq.texas.gov)>  
**Cc:** Jasmine Yuan <[Jasmine.Yuan@tceq.texas.gov](mailto:Jasmine.Yuan@tceq.texas.gov)>  
**Subject:** RE: 20250418 - Union Carbide Corporation - Renew SOP 2026\_38034

Mr. Gallegos,

Please note that this renewal project is intended to be combined with the minor permit revision project No. 37269. I'm copying the permit writer for that project, Jasmine Yuan, for reference.

From my conversation with Jasmine, I understood that since this renewal was being combined with the minor permit revision project, only the OP-PBR SUP, OP-REQ1, OP-SUMR, and NSR summary table were required to be submitted for this renewal application. However, if I misunderstood, I can proceed to complete and email the OP-1, OP-2, and OP-ACPS forms you mentioned. Just to confirm, will those additional forms be needed for these combined projects?

Thank you,  
Shawn Pena  
Environmental Specialist

---

**From:** Miguel Gallegos <[miguel.gallegos@tceq.texas.gov](mailto:miguel.gallegos@tceq.texas.gov)>  
**Sent:** Tuesday, April 15, 2025 12:39 PM  
**To:** Pena, Shawn (S) <[Shawn.Pena@dow.com](mailto:Shawn.Pena@dow.com)>  
**Cc:** Lyons, Heather (She/Her) (H) <[HLyons@dow.com](mailto:HLyons@dow.com)>  
**Subject:** Union Carbide Corporation - Renewal of SOP O2026, Project 38034

Mr. Shawn Pena,

Your application for the subject project is missing the required OP-1, OP-2 and OP-ACPS forms. See the Title V Attachments section of the attached STEERS Copy of Record. Please email those completed forms to me by close of business tomorrow, 04/16/2025, so your application is complete and can be accepted.



Thank you.

**Miguel Gallegos**

Texas Commission on Environmental Quality  
Office of Air, Air Permits Division  
Air Permits Initial Review Team (APIRT)  
12100 Park 35 Circle, MC-161, Austin, Texas 78753-1808  
Tel: (512) 239-1185, eFax: (512) 239-1400  
Email: [miguel.gallegos@tceq.texas.gov](mailto:miguel.gallegos@tceq.texas.gov)



**Federal Operating Permit Program  
Site Information Summary  
Form OP-1 (Page 1)  
Texas Commission on Environmental Quality**

Please print or type all information. Direct any questions regarding this application form to the Air Permits Division at (512) 239-1250 or to the Texas Commission on Environmental Quality, Office of Air, Air-Permits Division (MC 163), P.O. Box 13087, Austin, Texas 78711-3087.

<b>I. Company Identifying Information</b>
A. Company Name: Union Carbide Corporation
B. Customer Reference Number (CN): CN601688781
C. Submittal Date (mm/dd/yyyy): 04/16/2025
<b>II. Site Information</b>
A. Site Name: High Pressure II Unit
B. Regulated Entity Reference Number (RN): RN102181526
C. Indicate affected state(s) required to review permit application: <i>(Check the appropriate box[es].)</i>
<input type="checkbox"/> AR <input type="checkbox"/> CO <input type="checkbox"/> KS <input type="checkbox"/> LA <input type="checkbox"/> NM <input type="checkbox"/> OK <input checked="" type="checkbox"/> N/A
D. Indicate all pollutants for which the site is a major source based on the site's potential to emit: <i>(Check the appropriate box[es].)</i>
<input checked="" type="checkbox"/> VOC <input checked="" type="checkbox"/> NO <sub>x</sub> <input type="checkbox"/> SO <sub>2</sub> <input checked="" type="checkbox"/> PM <sub>10</sub> <input checked="" type="checkbox"/> CO <input type="checkbox"/> Pb <input checked="" type="checkbox"/> HAPS
Other:
E. Is the site a non-major source subject to the Federal Operating Permit Program? <span style="float: right;"><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</span>
F. Is the site within a local program area jurisdiction? <span style="float: right;"><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</span>
G. Will emissions averaging be used to comply with any Subpart of 40 CFR Part 63? <span style="float: right;"><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</span>
H. Indicate the 40 CFR Part 63 Subpart(s) that will use emissions averaging: N/A
<b>III. Permit Type</b>
A. Type of Permit Requested: <i>(Select only one response)</i>
<input checked="" type="checkbox"/> Site Operating Permit (SOP) <input type="checkbox"/> Temporary Operating Permit (TOP) <input type="checkbox"/> General Operating Permit (GOP)

**Federal Operating Permit Program  
Site Information Summary  
Form OP-1 (Page 2)  
Texas Commission on Environmental Quality**

<b>IV. Initial Application Information</b> <i>(Complete for Initial Issuance Applications Only.)</i>
<b>A.</b> Is this submittal an abbreviated or a full application? <span style="float: right;"><input type="checkbox"/> Abbreviated <input type="checkbox"/> Full</span>
<b>B.</b> If this is a full application, is the submittal a follow-up to an abbreviated application? <span style="float: right;"><input type="checkbox"/> Yes <input type="checkbox"/> No</span>
<b>C.</b> If this is an abbreviated application, is this an early submittal for a combined SOP and Acid Rain permit? <span style="float: right;"><input type="checkbox"/> Yes <input type="checkbox"/> No</span>
<b>D.</b> Has an electronic copy of this application been submitted (or is being submitted) to EPA? (Refer to the form instructions for additional information.) <span style="float: right;"><input type="checkbox"/> Yes <input type="checkbox"/> No</span>
<b>E.</b> Has the required Public Involvement Plan been included with this application? <span style="float: right;"><input type="checkbox"/> Yes <input type="checkbox"/> No</span>
<b>V. Confidential Information</b>
<b>A.</b> Is confidential information submitted in conjunction with this application? <span style="float: right;"><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</span>
<b>VI. Responsible Official (RO) Identifying Information</b>
RO Name Prefix: ( <input type="checkbox"/> Mr. <input type="checkbox"/> Mrs. <input checked="" type="checkbox"/> Ms. <input type="checkbox"/> Dr.)
RO Full Name: Heather Lyons
RO Title: Lead Site Manufacturing Director
Employer Name: The Dow Chemical Company
Mailing Address: P.O. Box 186
City: Port Lavaca
State: TX
ZIP Code: 77979
Territory:
Country: USA
Foreign Postal Code:
Internal Mail Code:
Telephone No.: 361-553-2769
Fax No.:
Email: hylons@dow.com

**Federal Operating Permit Program  
Site Information Summary  
Form OP-1 (Page 3)  
Texas Commission on Environmental Quality**

<b>VII. Technical Contact Identifying Information</b> <i>(Complete if different from RO.)</i>
Technical Contact Name Prefix: ( <input checked="" type="checkbox"/> Mr. <input type="checkbox"/> Mrs. <input type="checkbox"/> Ms. <input type="checkbox"/> Dr.)
Technical Contact Full Name: Shawn Pena
Technical Contact Title: Environmental Specialist
Employer Name: The Dow Chemical Company
Mailing Address: P.O. Box 186
City: Port Lavaca
State: TX
ZIP Code: 77979
Territory:
Country: USA
Foreign Postal Code:
Internal Mail Code:
Telephone No.: 361-553-3401
Fax No.:
Email: Shawn.Pena@dow.com
<b>VIII. Reference Only Requirements</b> <i>(For reference only.)</i>
<b>A.</b> State Senator: Lois W. Kolkorst
<b>B.</b> State Representative: J.M. Lozano
<b>C.</b> Has the applicant paid emissions fees for the most recent agency fiscal year (Sept. 1 - August 31)? <span style="float: right;"><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A</span>
<b>D.</b> Is the site subject to bilingual notice requirements pursuant to 30 TAC § 122.322? <span style="float: right;"><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</span>
<b>E.</b> Indicate the alternate language(s) in which public notice is required: Spanish

**Federal Operating Permit Program  
Site Information Summary  
Form OP-1 (Page 4)  
Texas Commission on Environmental Quality**

<b>IX. Off-Site Permit Request</b> <i>(Optional for applicants requesting to hold the FOP and records at an off-site location.)</i>
<b>A.</b> Office/Facility Name:
<b>B.</b> Physical Address:
City:
State:
ZIP Code:
Territory:
Country:
Foreign Postal Code:
<b>C.</b> Physical Location:
<b>D.</b> Contact Name Prefix: ( <input type="checkbox"/> Mr. <input type="checkbox"/> Mrs. <input type="checkbox"/> Ms. <input type="checkbox"/> Dr.)
Contact Full Name:
<b>E.</b> Telephone No.:
<b>X. Application Area Information</b>
<b>A.</b> Area Name: High Pressure II Unit
<b>B.</b> Physical Address: 7501 State Highway 185 N
City: Seadrift
State: TX
ZIP Code: 77983
<b>C.</b> Physical Location: 7501 State Highway 185 N
<b>D.</b> Nearest City: Seadrift
<b>E.</b> State: TX
<b>F.</b> ZIP Code: 77983

**Federal Operating Permit Program  
Site Information Summary  
Form OP-1 (Page 5)  
Texas Commission on Environmental Quality**

<b>X. Application Area Information (<i>continued</i>)</b>
<b>G.</b> Latitude (nearest second): 28° 30' 59"
<b>H.</b> Longitude (nearest second): -96° 46' 05"
<b>I.</b> Are there any emission units that were not in compliance with the applicable requirements identified in the application at the time of application submittal? <span style="float: right;"><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</span>
<b>J.</b> Indicate the estimated number of emission units in the application area: 50
<b>K.</b> Are there any emission units in the application area subject to the Acid Rain Program? <span style="float: right;"><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</span>
<b>L.</b> Affected Source Plant Code (or ORIS/Facility Code):
<b>XI. Public Notice</b> (Complete this section for SOP Applications and Acid Rain Permit Applications only.)
<b>A.</b> Name of a public place to view application and draft permit: Calhoun County Public Library
<b>B.</b> Physical Address: 200 W. Mahan
City: Port Lavaca
ZIP Code: 77979
<b>C.</b> Contact Person (Someone who will answer questions from the public during the public notice period):
Contact Name Prefix: ( <input checked="" type="checkbox"/> Mr. <input type="checkbox"/> Mrs. <input type="checkbox"/> Ms. <input type="checkbox"/> Dr.):
Contact Person Full Name: Shawn Pena
Contact Mailing Address: P.O. Box 186
City: Port Lavaca
State: TX
ZIP Code: 77979
Territory:
Country: USA
Foreign Postal Code:
Internal Mail Code:
Telephone No.: 361-553-3401

**Federal Operating Permit Program  
Site Information Summary  
Form OP-1 (Page 6)  
Texas Commission on Environmental Quality**

**XII. Delinquent Fees and Penalties**

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

**Complete Sections XIII and XIV for Acid Rain Permit and CSAPR applications only. Please include a copy of the Certificate of Representation submitted to EPA.**

**XIII. Designated Representative (DR) Identifying Information**

DR Name Prefix: (☐ Mr. ☐ Mrs. ☐ Ms. ☐ Dr.)

DR Full Name:

DR Title:

Employer Name:

Mailing Address:

City:

State:

ZIP Code:

Territory:

Country:

Foreign Postal Code:

Internal Mail Code:

Telephone No.:

Fax No.:

Email:

**Federal Operating Permit Program  
Site Information Summary  
Form OP-1 (Page 7)  
Texas Commission on Environmental Quality**

**Complete Sections XIII and XIV for Acid Rain Permit and CSAPR applications only. Please include a copy of the Certificate of Representation submitted to EPA.**

**XIV. Alternate Designated Representative (ADR) Identifying Information**

ADR Name Prefix: (☐ Mr. ☐ Mrs. ☐ Ms. ☐ Dr.)

ADR Full Name:

ADR Title:

Employer Name:

Mailing Address:

City:

State:

ZIP Code:

Territory:

Country:

Foreign Postal Code:

Internal Mail Code:

Telephone No.:

Fax No.:

Email:





Search the Directory

Search

## Sen. Lois W. Kolkhorst (R)

Last modified on: 11-09-2022 19:58:11

[↩ Back to Texas Senate \(/online/txsenate/\)](/online/txsenate/)

### TX Senator (Texas Senate (/online/txsenate/))

Entered Office: 12-22-2014

Term Ends: 01-2027

District: 18

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### General Information

Profession: Business Owner/Investor

Home Town: Brenham

Birthdate: 11-04-1964

Spouse: Jim

Download vCard (/online/vcard/?id=17026&office=16681) (? (/online/aboutvcards/))



✚ Add to Favorites ([/online/add\\_favorite/?name=Sen. Lois W. Kolkhorst](/online/add_favorite/?name=Sen. Lois W. Kolkhorst))

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## Personal Information

BS-Texas Christian University

H-2001-2014; S-2014-present

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## Office Information

Dist. 18 - Aransas, Austin, Burleson, Calhoun, DeWitt, Fayette, Fort Bend (45%), Goliad, Gonzales, Grimes, Harris (3%), Lavaca, Lee, Montgomery (6%), Refugio, Victoria, Waller (73%), Washington

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## Committees

**Health & Human Services-Chair** (</online/sencom/detail.php?id=303>); Administration (</online/sencom/detail.php?id=297>); Business & Commerce (</online/sencom/detail.php?id=298>); Finance (</online/sencom/detail.php?id=301>); Water, Agriculture & Rural Affairs (</online/sencom/detail.php?id=523>)

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## Contact and Phone Numbers

Capitol Office:

GE.4

Capitol Phone: (512) 463-0118

📍 District Map (<http://www.fyi.legis.texas.gov/fyiwebdocs/pdf/senate/dist18/m1.pdf>)

✉ Lois.Kolkhorst@senate.texas.gov (<mailto:Lois.Kolkhorst@senate.texas.gov>)

🐦 @loiskolkhorst (<https://twitter.com/loiskolkhorst>)

#### Victoria Dist. Office

311 E. Constitution St., Suite 120

Victoria, TX 77901

📞 (361) 573-7300

#### Fort Bend District Office

22310 Grand Corner Drive, #120

Katy, TX 77494

📞 (281) 394-5610

#### Brenham District Office

2000 S. Market St. #208

Brenham, TX 77833

📞 (979) 251-7888

#### Montgomery County Dist. Office

18230 FM 1488

Suite 314

Magnolia, TX 77354

📞 (281) 259-8513

## Staff

Office	Office Holder	Phone / Fax
Chief of Staff	Chris Steinbach (/online/person/?id=51186&staff=7151)	(512) 463-0118
Legislative Director & General Counsel	Grant McLoughlin (/online/person/?id=51250&staff=7186)	(512) 463-0118
Policy Advisor	Ryan Heare (/online/person/?id=70883&staff=10774)	(512) 463-0118
Policy Advisor	Michael Vallee (/online/person/?id=72338&staff=11106)	(512) 463-0118
District Director	Cheryl Tiemann (/online/person/?id=51457&staff=7383)	(979) 251-7888
Communications Director	Andrea Fischer (/online/person/?id=70885&staff=10776)	(979) 251-7888

## Other Offices Held

Board Member (?id=17026&office=21116) (Legislative Budget Board (/online/abc/detail.php?id=196))

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Roy Hodges (County Judge) (/online/search/?tosearch=Roy+Hodges+%28County+Judge%29&searchcat=1)

Todd Tefteller (County Judge) (/online/search/?tosearch=Todd+Teffteller+%28County+Judge%29&searchcat=1)

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Cities (/online/city/)

Counties (/online/county/?aid=m)

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PAT CURRY (TX HOUSE REPRESENTATIVE) (/ONLINE/SEARCH/?  
TOSEARCH=PAT+CURRY+%28TX+HOUSE+REPRESENTATIVE%29&SEARCHCAT=1)

## Useful Links

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---

Texas State Directory Press



1800 Nueces St.

Austin, Texas 78701

 (512) 473-2447

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## Rep. J.M. Lozano (R)

Last modified on: 01-04-2019 15:50:27

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### TX House Representative (Texas House of Representatives (/online/txhouse/))

Entered Office: 01-11-2011

District: 43

#### General Information

Profession: Restaurateur

Home Town: Kingsville

Birthdate: 05-23-1980

Spouse: Abby

Download vCard (/online/vcard/?id=39660&amp;office=16862) (? (/online/aboutvcards/))

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#### Personal Information

BA Government-University of Texas at Austin; MA-University of the Incarnate Word

H-2011-present

#### Office Information

Dist. 43 - Bee, Calhoun, Jim Wells, Kleberg, Refugio, San Patricio

Sens. Hinojosa, Kolkhorst, LaMantia

#### Committees

**Urban Affairs-Chair** (/online/housecom/detail.php?id=293); Redistricting (/online/housecom/detail.php?id=488); Transportation (/online/housecom/detail.php?id=292); Youth Health and Safety (/online/housecom/detail.php?id=543)

#### Contact and Phone Numbers

Capitol Office:

1W.4

Capitol Phone: (512) 463-0463  
📍 Zip Codes Within the District (<https://fyi.capitol.texas.gov/fyiwebdocs/PDF/house/dist43/r9.pdf>)  
📍 District Map (<http://www.fyi.legis.state.tx.us/fyiwebdocs/PDF/house/dist43/m1.pdf>)  
✉ [jm.lozano@house.texas.gov](mailto:jm.lozano@house.texas.gov) (<mailto:jm.lozano@house.texas.gov>)

District Office:  
1211 U.S. Highway 181 Suite 106  
Portland, TX 78374  
☎ (361) 643-0063

Staff

Office	Office Holder	Phone / Fax
Chief of Staff	Matt Lamon ( <a href="/online/person/?id=40747&amp;staff=5782">/online/person/?id=40747&amp;staff=5782</a> )	(512) 463-0463
District Director	Beverly Moore ( <a href="/online/person/?id=59554&amp;staff=8368">/online/person/?id=59554&amp;staff=8368</a> )	

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Bill Search (<http://www.legis.state.tx.us/Search/BillSearch.aspx>)

Texas at Your Fingertips (<https://texas.gov/>)

State Symbols (<https://www.thestoryoftexas.com/education/texas-symbols>)

Governor Appointment (<http://governor.state.tx.us/news/appointment/>)

Addressing Procedures (<https://lrl.texas.gov/genInfo/ContactLeg.cfm>)



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CAPITOL MAPS (HTTPS://TSPB.TEXAS.GOV/PLAN/MAPS/MAPS.HTML)	>
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BILL SEARCH (HTTP://WWW.LEGIS.STATE.TX.US/SEARCH/BILLSEARCH.ASPX)	>
TEXAS AT YOUR FINGERTIPS (HTTPS://TEXAS.GOV/)	>
STATE SYMBOLS (HTTP://WWW.LEGIS.STATE.TX.US/RESOURCES/STATESYMBOLS.ASPX)	>
GOVERNOR APPOINTMENT (HTTP://GOVERNOR.STATE.TX.US/NEWS/APPOINTMENT/)	>

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## Calhoun County Public Library

[Calhoun County, TX](#)

**Address:** 200 West Mahan Street  
**Port Lavaca, Texas**  
77979-3368  
United States

**County:** [Calhoun](#)


**Region:** [South Texas](#)

**Phone:** 361-552-7323

**Connect to:** [Library Web Site](#)✓ [Online Catalog](#)

**Library details:** **Calhoun County Public Library** is a **Public** library.

This library is affiliated with [Calhoun County Public Library \(view map\)](#) . The collection of the library contains **101,313** volumes. The library circulates **102,984** items per year. The library serves a population of **21,442** residents .

**Permalink:**  <https://librarytechnology.org/library/24499>  
(Use this link to refer back to this listing.)

**Administration:** The director of the library is **Noemi Cruz** .

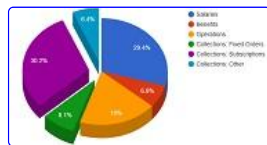
**Organizational structure:** This is a publicly funded and managed library.

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### Statistics Public

<b>Service Population</b>	21,442	<b>Residents</b>
<b>Collection size</b>	101,313	<b>volumes</b>
<b>Annual Circulation</b>	102,984	<b>transactions</b>



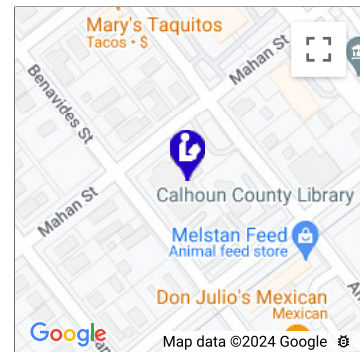
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### Technology Profile

	Product Name	Year Contracted
<b>Current Automation System</b>	<b>Apollo</b>	<b>2011</b>



Calhoun County Public Library



map location✓

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This library is responsible for the procurement of the library automation system.

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#### Identifiers

libraries.org ID	24499
OCLC Symbol	TXCLH
WorldCat Registry ID	<a href="#">117236</a>
NCES FSCSKEY	<a href="#">TX0233</a>
NCES LIBID	316

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**From:** Pena, Shawn (S) <Shawn.Pena@dow.com>  
**Sent:** Wednesday, April 16, 2025 1:49 PM  
**To:** Miguel Gallegos  
**Cc:** Jasmine Yuan; Lyons, Heather (She/Her) (H)  
**Subject:** RE: Union Carbide Corporation - Renewal of SOP O2026, Project 38034  
**Attachments:** Form OP-1.pdf; Form OP-2.pdf; Form OP-ACPS.pdf

Miguel,

Attached are the OP-1, OP-2 and OP-ACPS forms for the SOP O2026 renewal project 38034. Please let me know if you have any questions or if you need any additional information.

Regards,  
Shawn Pena  
Environmental Specialist  
361-553-3401

General Business

---

**From:** Miguel Gallegos <miguel.gallegos@tceq.texas.gov>  
**Sent:** Tuesday, April 15, 2025 3:29 PM  
**To:** Pena, Shawn (S) <Shawn.Pena@dow.com>  
**Cc:** Jasmine Yuan <Jasmine.Yuan@tceq.texas.gov>; Lyons, Heather (She/Her) (H) <HLyons@dow.com>  
**Subject:** FW: Union Carbide Corporation - Renewal of SOP O2026, Project 38034

**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.

Shawn,

Applications/Projects are processed separately in our Title V database and cannot be combined. Application materials received with each STEERS submission are regarded as being for that one action type alone. In this case a renewal application. The revision project is being processed as a separate project within the Air Permits Division. The technical reviewer may combine data from both applications in their permit correspondence and documents but the two projects cannot be processed in combination with each other while passing through the Air Permits Initial Review Team where I am. All of the application materials required for a renewal application must be submitted together at the time the renewal application is submitted as attachments to the STEERS submittal or the application is considered to be incomplete and cannot be accepted.

## Miguel Gallegos

Texas Commission on Environmental Quality  
Office of Air, Air Permits Division  
Air Permits Initial Review Team (APIRT)  
12100 Park 35 Circle, MC-161, Austin, Texas 78753-1808  
Tel: (512) 239-1185, eFax: (512) 239-1400  
Email: [miguel.gallegos@tceq.texas.gov](mailto:miguel.gallegos@tceq.texas.gov)



General Business

---

**From:** Pena, Shawn (S) <[Shawn.Pena@dow.com](mailto:Shawn.Pena@dow.com)>  
**Sent:** Tuesday, April 15, 2025 3:02 PM  
**To:** Miguel Gallegos <[miguel.gallegos@tceq.texas.gov](mailto:miguel.gallegos@tceq.texas.gov)>  
**Cc:** Jasmine Yuan <[Jasmine.Yuan@tceq.texas.gov](mailto:Jasmine.Yuan@tceq.texas.gov)>  
**Subject:** RE: 20250418 - Union Carbide Corporation - Renew SOP 2026\_38034

Mr. Gallegos,

Please note that this renewal project is intended to be combined with the minor permit revision project No. 37269. I'm copying the permit writer for that project, Jasmine Yuan, for reference.

From my conversation with Jasmine, I understood that since this renewal was being combined with the minor permit revision project, only the OP-PBRSUP, OP-REQ1, OP-SUMR, and NSR summary table were required to be submitted for this renewal application. However, if I misunderstood, I can proceed to complete and email the OP-1, OP-2, and OP-ACPS forms you mentioned. Just to confirm, will those additional forms be needed for these combined projects?

Thank you,  
Shawn Pena  
Environmental Specialist

---

**From:** Miguel Gallegos <[miguel.gallegos@tceq.texas.gov](mailto:miguel.gallegos@tceq.texas.gov)>  
**Sent:** Tuesday, April 15, 2025 12:39 PM  
**To:** Pena, Shawn (S) <[Shawn.Pena@dow.com](mailto:Shawn.Pena@dow.com)>  
**Cc:** Lyons, Heather (She/Her) (H) <[HLyons@dow.com](mailto:HLyons@dow.com)>  
**Subject:** Union Carbide Corporation - Renewal of SOP O2026, Project 38034

Mr. Shawn Pena,

Your application for the subject project is missing the required OP-1, OP-2 and OP-ACPS forms. See the Title V Attachments section of the attached STEERS Copy of Record. Please email those completed forms to me by close of business tomorrow, 04/16/2025, so your application is complete and can be accepted.

Thank you.

## **Miguel Gallegos**

Texas Commission on Environmental Quality

Office of Air, Air Permits Division

Air Permits Initial Review Team (APIRT)

12100 Park 35 Circle, MC-161, Austin, Texas 78753-1808

Tel: (512) 239-1185, eFax: (512) 239-1400

Email: [miguel.gallegos@tceq.texas.gov](mailto:miguel.gallegos@tceq.texas.gov)



**Texas Commission on Environmental Quality**  
**Form OP-ACPS**  
**Application Compliance Plan and Schedule**

<b>Date:</b> 04/16/2025	<b>Regulated Entity No.:</b> RN102181526	<b>Permit No.:</b> O2026
<b>Company Name:</b> Union Carbide Corporation		<b>Area Name:</b> High Pressure II Unit

- Part 1 of this form must be submitted with all initial FOP applications and renewal applications.
- The Responsible Official must use Form OP-CRO1 (Certification by Responsible Official) to certify information contained in this form in accordance with 30 TAC § 122.132(d)(8).

**Part 1**

<b>A. Compliance Plan — Future Activity Committal Statement</b>	
<p>The <i>Responsible Official</i> commits, utilizing reasonable effort, to the following:  As the responsible official it is my intent that all emission units shall continue to be in compliance with all applicable requirements they are currently in compliance with, and all emission units shall be in compliance by the compliance dates with any applicable requirements that become effective during the permit term.</p>	
<b>B. Compliance Certification - Statement for Units in Compliance*</b> (Indicate response by entering an "X" in the appropriate column)	
<b>1.</b> With the exception of those emission units listed in the Compliance Schedule section of this form (Part 2, below), and based, at minimum, on the compliance method specified in the associated applicable requirements, are all emission units addressed in this application in compliance with all their respective applicable requirements as identified in this application?	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO
<b>2.</b> Are there any non-compliance situations addressed in the Compliance Schedule Section of this form (Part 2)?	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
<b>3.</b> If the response to Item B.2, above, is "Yes," indicate the total number of Part 2 attachments included in this submittal. <i>(For reference only)</i>	N/A
<p>* For Site Operating Permits (SOPs), the complete application should be consulted for applicable requirements and their corresponding emission units when assessing compliance status.  For General Operating Permits (GOPs), the application documentation, particularly Form OP-REQ1 should be consulted as well as the requirements contained in the appropriate General Permits portion of 30 TAC Chapter 122.</p> <p>Compliance should be assessed based, at a minimum, on the required monitoring, testing, record keeping, and/or reporting requirements, as appropriate, associated with the applicable requirement in question.</p>	

**Texas Commission on Environmental Quality**  
**Form OP-ACPS**  
**Application Compliance Plan and Schedule**

<b>Date:</b> 04/16/2025	<b>Regulated Entity No.:</b> RN102181526	<b>Permit No.:</b> O2026
<b>Company Name:</b> Union Carbide Corporation		<b>Area Name:</b> High Pressure II Unit

**Part 2**

<b>A. Compliance Schedule</b>		
If there are non-compliance situations ongoing at time of application, then complete a separate OP-ACPS Part 2 for each separate non-compliance situation. <i>(See form instruction for details.)</i> If there are no non-compliance situations ongoing at time of application, then this section is not required to be completed.		
<b>1. Specific Non-Compliance Situation</b>		
Unit/Group/Process ID No.(s):		
SOP Index No.:		
Pollutant:		
<b>Applicable Requirement</b>		
<b>Citation</b>	<b>Text Description</b>	
N/A		
<b>2. Compliance Status Assessment Method and Records Location</b>		
<b>Citation</b>	<b>Text Description</b>	<b>Location of Records/Documentation</b>
N/A		
<b>3. Non-compliance Situation Description</b>		
N/A		
<b>4. Corrective Action Plan Description</b>		
N/A		
<b>5. List of Activities/Milestones to Implement the Corrective Action Plan</b>		
N/A		

**Texas Commission on Environmental Quality  
Form OP-ACPS  
Application Compliance Plan and Schedule**

<b>Date:</b> 04/16/2025	<b>Regulated Entity No.:</b> RN102181526	<b>Permit No.:</b> O2026
<b>Company Name:</b> Union Carbide Corporation		<b>Area Name:</b> High Pressure II Unit

**Part 2 (continued)**

<b>6. Previously Submitted Compliance Plan(s)</b>	
<b>Type of Action</b>	<b>Date Submitted</b>
N/A	
<b>7. Progress Report Submission Schedule</b>	
N/A	



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

Date: 04/16/2025	
Permit No.: 02026	
Regulated Entity No.: RN102181526	
Company Name: Union Carbide Corporation	
For Submissions to EPA	
Has an electronic copy of this application been submitted (or is being submitted) to EPA? <span style="float: right;"><input checked="" type="checkbox"/> YES <input type="checkbox"/> NO</span>	
<b>I. Application Type</b>	
Indicate the type of application:	
<input checked="" type="checkbox"/> Renewal	
<input type="checkbox"/> Streamlined Revision (Must include provisional terms and conditions as explained in the instructions.)	
<input type="checkbox"/> Significant Revision	
<input type="checkbox"/> Revision Requesting Prior Approval	
<input type="checkbox"/> Administrative Revision	
<input type="checkbox"/> Response to Reopening	
<b>II. Qualification Statement</b>	
For SOP Revisions Only <span style="float: right;"><input checked="" type="checkbox"/> YES <input type="checkbox"/> NO</span>	
For GOP Revisions Only <span style="float: right;"><input type="checkbox"/> YES <input type="checkbox"/> NO</span>	

**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<sub>x</sub>      ☐ SO<sub>2</sub>      ☒ PM<sub>10</sub>      ☒ CO      ☐ Pb      ☒ HAP

Other: NO

**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.

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

Date: 04/16/2025
Permit No.: 02026
Regulated Entity No.: RN102181526
Company Name: Union Carbide Corporation

Using the table below, provide a description of the 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	N/A	OP-UAs OP-REQ1	N/A	<p>UCC requests updates to sources whose UA forms have been updated since the last renewal.</p> <p>In addition, UCC is requesting to update the Preconstruction Authorizations. Please see the attached Form OP-REQ1.</p> <p>Additions have been bolded and italicized, and deletions have been marked with a strikethrough.</p>
2	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.</p> <p>Please update the authorizations for these units on the Form OP-SUMR to match the PBR Supplemental Table</p>

**Federal Operating Permit Program  
Application for Permit Revision/Renewal  
Form OP-2-Table 3  
Texas Commission on Environmental Quality**

Date: 04/16/2025	
Permit No.: 02026	
Regulated Entity No.: RN102181526	
Company Name: Union Carbide Corporation	
<b>I. Significant Revision</b> <i>(Complete this section if you are submitting a significant revision application or a renewal application that includes a significant revision.)</i>	
A.	Is the site subject to bilingual requirements pursuant to 30 TAC § 122.322? <span style="float: right;"><input type="checkbox"/> YES <input type="checkbox"/> NO</span>
B.	Indicate the alternate language(s) in which public notice is required:
C.	Will, there be a change in air pollutant emissions as a result of the significant revision? <span style="float: right;"><input type="checkbox"/> YES <input type="checkbox"/> NO</span>

**Federal Operating Permit Program  
Application for Permit Revision/Renewal  
Form OP-2-Table 3  
Texas Commission on Environmental Quality**

Using the table below, indicate the air pollutant(s) that will be changing and include a brief description of the change in pollutant emissions for each pollutant:

Pollutant	Description of the Change in Pollutant Emissions
N/A	N/A

**Federal Operating Permit Program  
Site Information Summary  
Form OP-1 (Page 1)  
Texas Commission on Environmental Quality**

Please print or type all information. Direct any questions regarding this application form to the Air Permits Division at (512) 239-1250 or to the Texas Commission on Environmental Quality, Office of Air, Air-Permits Division (MC 163), P.O. Box 13087, Austin, Texas 78711-3087.

<b>I. Company Identifying Information</b>
A. Company Name: Union Carbide Corporation
B. Customer Reference Number (CN): CN601688781
C. Submittal Date (mm/dd/yyyy): 04/16/2025
<b>II. Site Information</b>
A. Site Name: High Pressure II Unit
B. Regulated Entity Reference Number (RN): RN102181526
C. Indicate affected state(s) required to review permit application: <i>(Check the appropriate box[es].)</i>
<input type="checkbox"/> AR <input type="checkbox"/> CO <input type="checkbox"/> KS <input type="checkbox"/> LA <input type="checkbox"/> NM <input type="checkbox"/> OK <input checked="" type="checkbox"/> N/A
D. Indicate all pollutants for which the site is a major source based on the site's potential to emit: <i>(Check the appropriate box[es].)</i>
<input checked="" type="checkbox"/> VOC <input checked="" type="checkbox"/> NO <sub>x</sub> <input type="checkbox"/> SO <sub>2</sub> <input checked="" type="checkbox"/> PM <sub>10</sub> <input checked="" type="checkbox"/> CO <input type="checkbox"/> Pb <input checked="" type="checkbox"/> HAPS
Other:
E. Is the site a non-major source subject to the Federal Operating Permit Program? <span style="float: right;"><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</span>
F. Is the site within a local program area jurisdiction? <span style="float: right;"><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</span>
G. Will emissions averaging be used to comply with any Subpart of 40 CFR Part 63? <span style="float: right;"><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</span>
H. Indicate the 40 CFR Part 63 Subpart(s) that will use emissions averaging: N/A
<b>III. Permit Type</b>
A. Type of Permit Requested: <i>(Select only one response)</i>
<input checked="" type="checkbox"/> Site Operating Permit (SOP) <input type="checkbox"/> Temporary Operating Permit (TOP) <input type="checkbox"/> General Operating Permit (GOP)

**Federal Operating Permit Program  
Site Information Summary  
Form OP-1 (Page 2)  
Texas Commission on Environmental Quality**

<b>IV. Initial Application Information</b> <i>(Complete for Initial Issuance Applications Only.)</i>
<b>A.</b> Is this submittal an abbreviated or a full application? <span style="float: right;"><input type="checkbox"/> Abbreviated <input type="checkbox"/> Full</span>
<b>B.</b> If this is a full application, is the submittal a follow-up to an abbreviated application? <span style="float: right;"><input type="checkbox"/> Yes <input type="checkbox"/> No</span>
<b>C.</b> If this is an abbreviated application, is this an early submittal for a combined SOP and Acid Rain permit? <span style="float: right;"><input type="checkbox"/> Yes <input type="checkbox"/> No</span>
<b>D.</b> Has an electronic copy of this application been submitted (or is being submitted) to EPA? (Refer to the form instructions for additional information.) <span style="float: right;"><input type="checkbox"/> Yes <input type="checkbox"/> No</span>
<b>E.</b> Has the required Public Involvement Plan been included with this application? <span style="float: right;"><input type="checkbox"/> Yes <input type="checkbox"/> No</span>
<b>V. Confidential Information</b>
<b>A.</b> Is confidential information submitted in conjunction with this application? <span style="float: right;"><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</span>
<b>VI. Responsible Official (RO) Identifying Information</b>
RO Name Prefix: ( <input type="checkbox"/> Mr. <input type="checkbox"/> Mrs. <input checked="" type="checkbox"/> Ms. <input type="checkbox"/> Dr.)
RO Full Name: Heather Lyons
RO Title: Lead Site Manufacturing Director
Employer Name: The Dow Chemical Company
Mailing Address: P.O. Box 186
City: Port Lavaca
State: TX
ZIP Code: 77979
Territory:
Country: USA
Foreign Postal Code:
Internal Mail Code:
Telephone No.: 361-553-2769
Fax No.:
Email: hylons@dow.com

**Federal Operating Permit Program  
Site Information Summary  
Form OP-1 (Page 3)  
Texas Commission on Environmental Quality**

<b>VII. Technical Contact Identifying Information</b> <i>(Complete if different from RO.)</i>
Technical Contact Name Prefix: ( <input checked="" type="checkbox"/> Mr. <input type="checkbox"/> Mrs. <input type="checkbox"/> Ms. <input type="checkbox"/> Dr.)
Technical Contact Full Name: Shawn Pena
Technical Contact Title: Environmental Specialist
Employer Name: The Dow Chemical Company
Mailing Address: P.O. Box 186
City: Port Lavaca
State: TX
ZIP Code: 77979
Territory:
Country: USA
Foreign Postal Code:
Internal Mail Code:
Telephone No.: 361-553-3401
Fax No.:
Email: Shawn.Pena@dow.com
<b>VIII. Reference Only Requirements</b> <i>(For reference only.)</i>
<b>A.</b> State Senator: Lois W. Kolkorst
<b>B.</b> State Representative: J.M. Lozano
<b>C.</b> Has the applicant paid emissions fees for the most recent agency fiscal year (Sept. 1 - August 31)? <span style="float: right;"><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A</span>
<b>D.</b> Is the site subject to bilingual notice requirements pursuant to 30 TAC § 122.322? <span style="float: right;"><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</span>
<b>E.</b> Indicate the alternate language(s) in which public notice is required: Spanish



**Federal Operating Permit Program  
Site Information Summary  
Form OP-1 (Page 4)  
Texas Commission on Environmental Quality**

<b>IX. Off-Site Permit Request</b> <i>(Optional for applicants requesting to hold the FOP and records at an off-site location.)</i>
<b>A.</b> Office/Facility Name:
<b>B.</b> Physical Address:
City:
State:
ZIP Code:
Territory:
Country:
Foreign Postal Code:
<b>C.</b> Physical Location:
<b>D.</b> Contact Name Prefix: ( <input type="checkbox"/> Mr. <input type="checkbox"/> Mrs. <input type="checkbox"/> Ms. <input type="checkbox"/> Dr.)
Contact Full Name:
<b>E.</b> Telephone No.:
<b>X. Application Area Information</b>
<b>A.</b> Area Name: High Pressure II Unit
<b>B.</b> Physical Address: P.O. Box 186
City: Port Lavaca
State: TX
ZIP Code: 77979
<b>C.</b> Physical Location: State Highway 185, North Seadrift, TX 77983
<b>D.</b> Nearest City: Seadrift
<b>E.</b> State: TX
<b>F.</b> ZIP Code: 77983

**Federal Operating Permit Program  
Site Information Summary  
Form OP-1 (Page 5)  
Texas Commission on Environmental Quality**

<b>X. Application Area Information (<i>continued</i>)</b>
<b>G.</b> Latitude (nearest second): 28° 30' 59"
<b>H.</b> Longitude (nearest second): -96° 46' 05"
<b>I.</b> Are there any emission units that were not in compliance with the applicable requirements identified in the application at the time of application submittal? <span style="float: right;"><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</span>
<b>J.</b> Indicate the estimated number of emission units in the application area: 50
<b>K.</b> Are there any emission units in the application area subject to the Acid Rain Program? <span style="float: right;"><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</span>
<b>L.</b> Affected Source Plant Code (or ORIS/Facility Code):
<b>XI. Public Notice</b> (Complete this section for SOP Applications and Acid Rain Permit Applications only.)
<b>A.</b> Name of a public place to view application and draft permit: Calhoun County Public Library
<b>B.</b> Physical Address: 200 W. Mahan
City: Port Lavaca
ZIP Code: 77979
<b>C.</b> Contact Person (Someone who will answer questions from the public during the public notice period):
Contact Name Prefix: ( <input checked="" type="checkbox"/> Mr. <input type="checkbox"/> Mrs. <input type="checkbox"/> Ms. <input type="checkbox"/> Dr.):
Contact Person Full Name: Shawn Pena
Contact Mailing Address: P.O. Box 186
City: Port Lavaca
State: TX
ZIP Code: 77979
Territory:
Country: USA
Foreign Postal Code:
Internal Mail Code:
Telephone No.: 361-553-3401

**Federal Operating Permit Program  
Site Information Summary  
Form OP-1 (Page 6)  
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<b>XII. Delinquent Fees and Penalties</b>
<b>Notice:</b> This form will not be processed until all delinquent fees and/or penalties owed to TCEQ or the Office of Attorney General on behalf of TCEQ are paid in accordance with the "Delinquent Fee and Penalty Protocol."
<b>Complete Sections XIII and XIV for Acid Rain Permit and CSAPR applications only. Please include a copy of the Certificate of Representation submitted to EPA.</b>
<b>XIII. Designated Representative (DR) Identifying Information</b>
DR Name Prefix: ( <input type="checkbox"/> Mr. <input type="checkbox"/> Mrs. <input type="checkbox"/> Ms. <input type="checkbox"/> Dr.)
DR Full Name:
DR Title:
Employer Name:
Mailing Address:
City:
State:
ZIP Code:
Territory:
Country:
Foreign Postal Code:
Internal Mail Code:
Telephone No.:
Fax No.:
Email:

**Federal Operating Permit Program  
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Form OP-1 (Page 7)  
Texas Commission on Environmental Quality**

**Complete Sections XIII and XIV for Acid Rain Permit and CSAPR applications only. Please include a copy of the Certificate of Representation submitted to EPA.**

**XIV. Alternate Designated Representative (ADR) Identifying Information**

ADR Name Prefix: (☐ Mr. ☐ Mrs. ☐ Ms. ☐ Dr.)

ADR Full Name:

ADR Title:

Employer Name:

Mailing Address:

City:

State:

ZIP Code:

Territory:

Country:

Foreign Postal Code:

Internal Mail Code:

Telephone No.:

Fax No.:

Email:

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

[Table 1](#)

Date	Permit No.	Regulated Entity No.
04/11/25	O2026	RN102181526

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
	2	1039	OP-UA15	BLENDER VENT		2023	PSDTX118M4
	2	1041	OP-UA13	COOLING TOWER		2023	PSDTX118M4
	2	253	OP-UA15	#1 REACTION EXTRUDER DRIER		2023 106.264/09/04/2000	PSDTX118M4
	2, 4	254	OP-UA15	#1 REACTION PRIMARY STORAGE BIN		2023 106.261/11/01/2003 [118024] 106.262/11/01/2003 [118024]	PSDTX118M4
	2, 4	255	OP-UA15	#1 REACTION PRIMARY STORAGE BIN		2023 106.261/11/01/2003 [118024] 106.262/11/01/2003 [118024]	PSDTX118M4
	2, 4	256	OP-UA15	#1 REACTION PRIMARY STORAGE BIN		2023 106.261/11/01/2003 [118024] 106.262/11/01/2003 [118024]	PSDTX118M4
	2, 4	257	OP-UA15	#1 REACTION PRIMARY STORAGE BIN		2023 106.261/11/01/2003 [118024] 106.262/11/01/2003 [118024]	PSDTX118M4
	2, 4	258	OP-UA15	#1 REACTION PRIMARY STORAGE BIN		2023 106.261/11/01/2003 [118024] 106.262/11/01/2003 [118024]	PSDTX118M4

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This form is for use by facilities subject to air quality permit requirements and may be revised periodically.

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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
	2, 4	259	OP-UA15	#1 REACTION PRIMARY STORAGE BIN		2023 106.261/11/01/2003 [118024] 106.262/11/01/2003 [118024]	PSDTX118M4
	2, 4	260	OP-UA15	#1 REACTION PRIMARY STORAGE BIN		2023 106.261/11/01/2003 [118024] 106.262/11/01/2003 [118024]	PSDTX118M4
	2, 4	261	OP-UA15	BULK STORAGE BIN		2023 106.261/11/01/2003 [118024] 106.262/11/01/2003 [118024]	PSDTX118M4
	2, 4	262	OP-UA15	BULK STORAGE BIN		2023 106.261/11/01/2003 [118024] 106.262/11/01/2003 [118024]	PSDTX118M4
	2, 4	263	OP-UA15	BULK STORAGE BIN		2023 106.261/11/01/2003 [118024] 106.262/11/01/2003 [118024]	PSDTX118M4
	2, 4	264	OP-UA15	BULK STORAGE BIN		2023 106.261/11/01/2003 [118024] 106.262/11/01/2003 [118024]	PSDTX118M4
	2, 4	265	OP-UA15	BULK STORAGE BIN		2023 106.261/11/01/2003 [118024] 106.262/11/01/2003 [118024]	PSDTX118M4

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[Table 1](#)

Date	Permit No.	Regulated Entity No.
04/11/25	O2026	RN102181526

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
	2, 4	266	OP-UA15	BULK STORAGE BIN		2023 106.261/11/01/2003 [118024] 106.262/11/01/2003 [118024]	PSDTX118M4
	2, 4	267	OP-UA15	BULK STORAGE BIN		2023 106.261/11/01/2003 [118024] 106.262/11/01/2003 [118024]	PSDTX118M4
	2, 4	268	OP-UA15	BULK STORAGE BIN		2023 106.261/11/01/2003 [118024] 106.262/11/01/2003 [118024]	PSDTX118M4
	2	270	OP-UA15	#2 REACTION EXTRUDER DRIER		2023	PSDTX118M4
	2, 4	271	OP-UA15	#2 REACTION PRIMARY STORAGE BIN		2023 106.261/11/01/2003 [118024] 106.262/11/01/2003 [118024]	PSDTX118M4
	2, 4	272	OP-UA15	#2 REACTION PRIMARY STORAGE BIN		2023 106.261/11/01/2003 [118024] 106.262/11/01/2003 [118024]	PSDTX118M4
	2, 4	273	OP-UA15	#2 REACTION PRIMARY STORAGE BIN		2023 106.261/11/01/2003 [118024] 106.262/11/01/2003 [118024]	PSDTX118M4

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**Table 1**

Date	Permit No.	Regulated Entity No.
04/11/25	O2026	RN102181526

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
	2, 4	274	OP-UA15	#2 REACTION PRIMARY STORAGE BIN		2023 106.261/11/01/2003 [118024] 106.262/11/01/2003 [118024]	PSDTX118M4
	2, 4	275	OP-UA15	#2 REACTION PRIMARY STORAGE BIN		2023 106.261/11/01/2003 [118024] 106.262/11/01/2003 [118024]	PSDTX118M4
	2, 4	276	OP-UA15	#2 REACTION BULK STORAGE BIN		2023 106.261/11/01/2003 [118024] 106.262/11/01/2003 [118024]	PSDTX118M4
	2, 4	277	OP-UA15	#2 REACTION BULK STORAGE BIN		2023 106.261/11/01/2003 [118024] 106.262/11/01/2003 [118024]	PSDTX118M4
	2, 4	278	OP-UA15	#2 REACTION BULK STORAGE BIN		2023 106.261/11/01/2003 [118024] 106.262/11/01/2003 [118024]	PSDTX118M4
	2, 4	279	OP-UA15	#2 REACTION BULK STORAGE BIN		2023 106.261/11/01/2003 [118024] 106.262/11/01/2003 [118024]	PSDTX118M4
	2, 4	280	OP-UA15	#2 REACTION BULK STORAGE BIN		2023 106.261/11/01/2003 [118024] 106.262/11/01/2003 [118024]	PSDTX118M4

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**Table 1**

Date	Permit No.	Regulated Entity No.
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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
	2, 4	281	OP-UA15	#2 REACTION BULK STORAGE BIN		2023 106.261/11/01/2003 106.262/11/01/2003	PSDTX118M4
	2, 4	282	OP-UA15	#2 REACTION BULK STORAGE BIN		2023 106.261/11/01/2003 106.262/11/01/2003	PSDTX118M4
	2	284	OP-UA15	MIX TANK VENT		2023	PSDTX118M4
	2	289	OP-UA15	REFRIGERATED ISOPROPANOL TANK VENT		2023	PSDTX118M4
	1,2	2PURCOL	OP-UA15	NO. 2 PURGE COLUMN		2023	PSDTX118M4
	2	306	OP-UA15	SCRAP BIN		2023	PSDTX118M4
	2	414	OP-UA15	SCREEN PACK CLEANER/DIE PLATE CLEANER		106.495/09/04/2000	
	2	547	OP-UA15	PREHEAT BIN		2023	PSDTX118M4
	2	549	OP-UA15	HOLDING BIN		2023 106.261/11/01/2003 [108571] 106.262/11/01/2003 [108571]	PSDTX118M4
	2	552	OP-UA15	COOLING BIN		2023	PSDTX118M4

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**Table 1**

Date	Permit No.	Regulated Entity No.
04/11/25	O2026	RN102181526

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
	2	553	OP-UA15	COOLING BIN		2023	PSDTX118M4
	1, 2	561	OP-UA3	INHIBITOR TANK		2023	PSDTX118M4
	2	669	OP-UA15	A/O MIX TANK		2023 106.472/09/04/2000	PSDTX118M4
	1, 2	EAVACOL	OP-UA15	EA/VA REMOVAL COLUMN		2023	PSDTX118M4
	1, 2	FGSEP	OP-UA15	FURNACE GAS ENTRAINMENT SEPARATOR		2023	PSDTX118M4
	1, 2	HP2FUGS	OP-UA1 OP-UA12	FUGITIVE EMISSIONS		2023 106.261/11/01/2003	PSDTX118M4
	1, 2	ISOCOL	OP-UA15	ISO COLUMN C-901 OVERHEAD		2023	PSDTX118M4

**Texas Commission on Environmental Quality  
Federal Operating Permit Program  
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[Table 1](#)

Date	Permit No.	Regulated Entity No.
04/11/25	O2026	RN102181526

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
	3, 4	RX2EXTR1	OP-UA15	HP-2 RX2 EXTRUDER SEAL NO. 1		2023	PSDTX118M4
	3, 4	RX2EXTR2	OP-UA15	HP-2 RX2 EXTRUDER SEAL NO. 2		2023	PSDTX118M4
	2	SDL15	OP-UA1 OP-UA4	HP2 PROPYLENE UNLOADING		2023	PSDTX118M4
	2	SDL16	OP-UA1 OP-UA4	HP2 ISOPROPANOL TANK TRUCK UNLOADING		2023	PSDTX118M4
	2	SDL17	OP-UA1 OP-UA4	HP2 ETHYL ACRYLATE/VINYL ACETATE TANK CAR UNLOADING		2023	PSDTX118M4
	2	UNLDGLOW	OP-UA4	LOW VAPOR PRESSURE VOC UNLOADING		2023	PSDTX118M4

**Texas Commission on Environmental Quality  
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[Table 2](#)

Date	Permit No.	Regulated Entity No.
04/11/25	O2026	RN102181526

Revision No.	ID No.	Applicable Form	Group AI	Group ID No.
2	1039	OP-UA15		GRPVENT2
2	253	OP-UA15		GRPVNT1B
2, 4	254	OP-UA15		GRPVNT1B
2, 4	255	OP-UA15		GRPVNT1B
2, 4	256	OP-UA15		GRPVNT1B
2, 4	257	OP-UA15		GRPVNT1B
2, 4	258	OP-UA15		GRPVNT1B
2, 4	259	OP-UA15		GRPVNT1B
2, 4	260	OP-UA15		GRPVNT1B
2, 4	261	OP-UA15		GRPVNT1B
2, 4	262	OP-UA15		GRPVNT1B
2,4	263	OP-UA15		GRPVNT1B

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This form is for use by facilities subject to air quality permit requirements and may be revised periodically.

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[Table 2](#)

Date	Permit No.	Regulated Entity No.
04/11/25	O2026	RN102181526

Revision No.	ID No.	Applicable Form	Group AI	Group ID No.
2, 4	264	OP-UA15		GRPVNT1B
2, 4	265	OP-UA15		GRPVNT1B
2, 4	266	OP-UA15		GRPVNT1B
2, 4	267	OP-UA15		GRPVNT1B
2, 4	268	OP-UA15		GRPVNT1B
2	270	OP-UA15		GRPVNT1B
2, 4	271	OP-UA15		GRPVNT1B
2, 4	272	OP-UA15		GRPVNT1B
2, 4	273	OP-UA15		GRPVNT1B
2, 4	274	OP-UA15		GRPVNT1B
2, 4	275	OP-UA15		GRPVNT1B
2, 4	276	OP-UA15		GRPVNT1B

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**Table 2**

Date	Permit No.	Regulated Entity No.
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Revision No.	ID No.	Applicable Form	Group AI	Group ID No.
2, 4	277	OP-UA I 5		GRPVNT1B
2, 4	278	OP-UA15		GRPVNT1B
2, 4	279	OP-UA15		GRPVNT1B
2, 4	280	OP-UA15		GRPVNT1B
2, 4	281	OP-UA15		GRPVNT1B
2, 4	282	OP-UA15		GRPVNT1B
2, 4	284	OP-UA I 5		GRPVENT2
2, 4	289	OP UA15		GRPVENT2
1, 2	2PURCOL	OP-UA15		GRP-MONCVNT
2	306	OP-UA 15		GRPVNT1B
2	414	OP-UA15		GRPVENT2
2	547	OP-UA15		GRPVENT2

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[Table 2](#)

Date	Permit No.	Regulated Entity No.
04/11/25	O2026	RN102181526

Revision No.	ID No.	Applicable Form	Group AI	Group ID No.
2	549	OP-UA15		GRPVENT1
2	552	OP-UA15		GRPVENT1
2	553	OP-UA15		GRPVENT1
2	669	OP-UA 15		GRPVENT2
1, 2	EAVACOL	OP-UA 15		GRP-MONCVNT
1, 2	FGSEP	OP-UA15		GRP-MONCVNT
1, 2	ISOCOL	OP-UA15		GRP-MONCVNT
3, 4	RX2EXTR1	OP-UA15		GRPVENT2
3, 4	RX2EXTR2	OP-UA15		GRPVENT2
2	SDL15	OP-UA1 OP-UA4		GRPUNLDGHI
2	SDL16	OP-UA1 OP-UA4		GRPUNLDGHI

# Application Area-Wide Applicability Determinations and General Information

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### Federal Operating Permit Program

### Texas Commission on Environmental Quality

Date	Permit No.	Regulated Entity No.
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For SOP applications, answer ALL questions unless otherwise directed.

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

XII. New Source Review (NSR) Authorizations (continued)		
B. Air Quality Standard Permits		
◆ 1.	The application area includes at least one Air Quality Standard Permit NSR authorization. <i>If the response to XII.B.1 is "No," go to Section XII.C. If the response to XII.B.1 is "Yes," be sure to include the standard permit's registration numbers in Section XII.H and answer XII.B.2 - B.16 as appropriate.</i>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
◆ 2.	The application area includes at least one "State Pollution Control Project" Air Quality Standard Permit NSR authorization under 30 TAC § 116.617.	<input type="checkbox"/> Yes <input type="checkbox"/> No
◆ 3.	The application area includes at least one non-rule Air Quality Standard Permit for Pollution Control Projects NSR authorization.	<input type="checkbox"/> Yes <input type="checkbox"/> No
◆ 4.	The application area includes at least one "Installation and/or Modification of Oil and Gas Facilities" Air Quality Standard Permit NSR authorization under 30 TAC § 116.620.	<input type="checkbox"/> Yes <input type="checkbox"/> No
◆ 5.	The application area includes at least one non-rule Air Quality Standard Permit for Oil and Gas Handling and Production Facilities NSR authorization.	<input type="checkbox"/> Yes <input type="checkbox"/> No
◆ 6.	The application area includes at least one "Municipal Solid Waste Landfill" Air Quality Standard Permit NSR authorization under 30 TAC § 116.621.	<input type="checkbox"/> Yes <input type="checkbox"/> No
◆ 7.	The application area includes at least one "Municipal Solid Waste Landfill Facilities and Transfer Stations" Standard Permit authorization under 30 TAC Chapter 330, Subchapter U.	<input type="checkbox"/> Yes <input type="checkbox"/> No
8.	The application area includes at least one "Concrete Batch Plant" Air Quality Standard Permit NSR authorization.	<input type="checkbox"/> Yes <input type="checkbox"/> No
9.	The application area includes at least one "Concrete Batch Plant with Enhanced Controls" Air Quality Standard Permit NSR authorization.	<input type="checkbox"/> Yes <input type="checkbox"/> No
10.	The application area includes at least one "Hot Mix Asphalt Plant" Air Quality Standard Permit NSR authorization.	<input type="checkbox"/> Yes <input type="checkbox"/> No



# Application Area-Wide Applicability Determinations and General Information

## Form OP-REQ1 (Page 87)

### Federal Operating Permit Program

### Texas Commission on Environmental Quality

Date	Permit No.	Regulated Entity No.
04/11/2025	O-2026	RN102181526

For SOP applications, answer ALL questions unless otherwise directed.

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

XII. New Source Review (NSR) Authorizations (continued)		
B. Air Quality Standard Permits (continued)		
◆ 11.	The application area includes at least one "Rock Crusher" Air Quality Standard Permit NSR authorization.	<input type="checkbox"/> Yes <input type="checkbox"/> No
◆ 12.	The application area includes at least one "Electric Generating Unit" Air Quality Standard Permit NSR authorization. <i>If the response to XII.B.12 is "No," go to Question XII.B.15.</i>	<input type="checkbox"/> Yes <input type="checkbox"/> No
◆ 13.	For purposes of "Electric Generating Unit" Air Quality Standard Permit, the application area is located in the East Texas Region.	<input type="checkbox"/> Yes <input type="checkbox"/> No
◆ 14.	For purposes of "Electric Generating Unit" Air Quality Standard Permit, the application area is located in the West Texas Region.	<input type="checkbox"/> Yes <input type="checkbox"/> No
◆ 15.	The application area includes at least one "Boiler" Air Quality Standard Permit NSR authorization.	<input type="checkbox"/> Yes <input type="checkbox"/> No
◆ 16.	The application area includes at least one "Sawmill" Air Quality Standard Permit NSR authorization.	<input type="checkbox"/> Yes <input type="checkbox"/> No
C. Flexible Permits		
1.	The application area includes at least one Flexible Permit NSR authorization.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
D. Multiple Plant Permits		
1.	The application area includes at least one Multi-Plant Permit NSR authorization.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No

**Application Area-Wide Applicability Determinations and General Information**  
**Form OP-REQ1 (Page 88)**  
**Federal Operating Permit Program**  
**Texas Commission on Environmental Quality**

Date	Permit No.	Regulated Entity No.
04/11/2025	O-2026	RN102181526

For SOP applications, answer ALL questions unless otherwise directed.

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

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

**E. PSD Permits and PSD Major Pollutants**

Permit No.	Issuance Date	Pollutant(s):	Permit No.	Issuance Date	Pollutant(s):
PSDTX118M4	05/03/2024	VOC, CO, NOX, PM, PM10, PM2.5			

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](http://www.tceq.texas.gov/permitting/air/titlev/site/site_experts.html).

**F. Nonattainment (NA) Permits and NA Major Pollutants**

Permit No.	Issuance Date	Pollutant(s):	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](http://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
2023	05/03/2024				

**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.
04/11/2025	O-2026	RN102181526

For SOP applications, answer ALL questions unless otherwise directed.

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

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

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

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

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

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

PBR No.	Version No./Date	PBR No.	Version No./Date	PBR No.	Version No./Date
106.261	11/01/2003				
106.262	11/01/2003				
106.263	11/01/2001				
106.472	09/04/2000				
106.495	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 (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
04/11/25	O2026	RN102181526

Unit ID No.	Registration No.	PBR No.	Registration Date
246, 251, 269	169847	PBR 106.261 PBR 106.476	09/15/2022
254-268 and 271-282	118024	PBR 106.261 PBR 106.262	05/30/2014
1245, 549	108571	PBR 106.261 PBR 106.262	07/10/2013
251, 269	84497	PBR 106.261	05/06/2008
246	90957	PBR 106.261 PBR 106.262	10/27/2009

**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
04/11/25	O2026	RN102181526

Unit ID No.	PBR No.	Version No./Date
669, 672	PBR 106.472	09/04/2000
414	PBR 106.495	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

PBR No.	Version No./Date
N/A	N/A
N/A	N/A
N/A	N/A
N/A	N/A
N/A	N/A
N/A	N/A
N/A	N/A
N/A	N/A
N/A	N/A
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
04/11/25	O2026	RN102181526

Unit ID No.	PBR No.	Version No./Date Or Registration No.	Monitoring Requirement
246, 251, 269	PBR 106.261 PBR 106.476	169847	Hours of online time for equipment are tracked. Monitoring is performed for fugitive emission components.
254-268 and 271-282	PBR 106.261 PBR 106.262	118024	Production throughput for bins is tracked.
1245, 549	PBR 106.261 PBR 106.262	108571	Production throughput for equipment is tracked.
669, 672	PBR 106.472	09/04/2000	Throughput for equipment is tracked.
414	PBR 106.495	09/04/2000	Hours of operating for screenpack burner is tracked.
251, 269	PBR 106.261	84497	Equipment is monitored under fugitive emission program.
246	PBR 106.261 PBR 106.262	90957	Throughput of vinyl acetate is tracked.

### Major NSR Summary Table

Permit Numbers: 2023 and PSDTX118M4					Issuance Date: May 3, 2024		
Emission Point No. (1)	Source Name (2)	Air Contaminant Name (3)	Emission Rates		Monitoring and Testing Requirements	Recordkeeping Requirements	Reporting Requirements
			lb/hr	TPY (4)	Special Condition/Application Information	Special Condition/Application Information	Special Condition/Application Information
246	Flare (11)(14)	Acetone	0.03	0.02	2, 13	2, 3, 13	2, 13
		CO	25.65	16.74			
		NOx	4.97	3.24			
		Ethylene (12)	28.60	20.47			
		Vinyl Acetate (12)	1.51	1.6			
		Ethyl Acrylate (12)	1.20	0.04			
		Propylene (12)	6.96	2.66			
		Toluene (12)	0.01	0.01			
		VOC	38.35	24.83			
246	Flare Maintenance, Start-Up, and Shutdown Emissions (MSS) only (11)(14)	Acetone	0.02	0.01	11, 13	11, 13	13
		CO	158.87	12.29			
		NOx	31.18	2.41			
		VOC	260.53	18.02			
		Ethylene (13)		7.42			
		Propylene (13)		0.50			
		Vinyl Acetate (13)		0.01			
		Ethyl Acrylate (13)		0.01			



Major NSR Summary Table

Permit Numbers: 2023 and PSDTX118M4					Issuance Date: May 3, 2024		
Emission Point No. (1)	Source Name (2)	Air Contaminant Name (3)	Emission Rates		Monitoring and Testing Requirements	Recordkeeping Requirements	Reporting Requirements
			lb/hr	TPY (4)	Special Condition/Application Information	Special Condition/Application Information	Special Condition/Application Information
		Vinyltrimethoxysilane (13)		0.01			
		Mineral Spirits (13)		0.01			
251	Reactor No. 1 Process Fugitives (5)	Acetone	0.07	0.29	2, 9	2, 9 12	2
		CO	0.01	0.01			
		VOC	9.36	41.00			
252	No. 1 Cyclone Scrubber Vent	VOC	0.06	0.01		3	
253	No. 1 Extruder Drier	Vinyl Acetate	7.00	(6)	4, 5, 6, 7	3, 4, 5, 6, 7	6
		Ethylene	4.00	(6)			
		Propylene	0.20	(6)			
		Ethyl Acrylate	0.01	(6)			
		Acetone	0.07	(6)			
		PM	1.30	5.69			
		PM <sub>10</sub>	1.30	5.69			
		PM <sub>2.5</sub>	1.30	5.69			
254 - 260	No. 1 Primary Storage Bins	Vinyl Acetate	21.73	(6)	2, 4, 5, 6, 7	2, 3, 4, 5, 6, 7	2, 6
		Ethylene	32.00	(6)			

Major NSR Summary Table

Permit Numbers: 2023 and PSDTX118M4					Issuance Date: May 3, 2024		
Emission Point No. (1)	Source Name (2)	Air Contaminant Name (3)	Emission Rates		Monitoring and Testing Requirements	Recordkeeping Requirements	Reporting Requirements
			lb/hr	TPY (4)	Special Condition/Application Information	Special Condition/Application Information	Special Condition/Application Information
		Propylene	1.54	(6)			
		Ethyl Acrylate	0.01	(6)			
		Acetone	0.58	(6)			
		PM		(6)			
		PM <sub>10</sub>		(6)			
		PM <sub>2.5</sub>		(6)			
261 - 268	No. 1 Bulk Storage Bins	Vinyl Acetate	21.73	19.50 (7)	2, 4, 5, 6, 7	2, 3, 4, 5, 6, 7	2, 6
		Ethylene	32.00	118.00 (7)			
		Propylene	1.54	4.67			
		Ethyl Acrylate	0.01	0.01			
		Acetone	0.58	0.62			
		PM	2.05	8.98			
		PM <sub>10</sub>	2.05	8.98			
		PM <sub>2.5</sub>	2.05	8.98			
269	Reactor No. 2 Process Fugitives (5)	CO	0.60	2.64	9	9, 12	
		VOC	6.16	26.99			
270	No. 2 Extruder Drier	Ethylene	4.00	(8)	4, 5, 6, 7	3, 4, 5, 6, 7	6

### Major NSR Summary Table

Permit Numbers: 2023 and PSDTX118M4					Issuance Date: May 3, 2024		
Emission Point No. (1)	Source Name (2)	Air Contaminant Name (3)	Emission Rates		Monitoring and Testing Requirements	Recordkeeping Requirements	Reporting Requirements
			lb/hr	TPY (4)	Special Condition/Application Information	Special Condition/Application Information	Special Condition/Application Information
		Propylene	0.20	(8)			
		Acetone	0.07	(8)			
		PM	1.30	5.69			
		PM <sub>10</sub>	1.30	5.69			
		PM <sub>2.5</sub>	1.30	5.69			
271 - 275	No. 2 Primary Storage Bins	Vinyl Acetate	21.73	(8)	2, 4, 5, 6, 7	2, 3, 4, 5, 6, 7	2, 6
		Ethylene	32.00	(8)			
		Propylene	1.54	(8)			
		Ethyl Acrylate	0.01	(8)			
		Acetone	0.58	(8)			
		PM	(8)				
		PM <sub>10</sub>	(8)				
		PM <sub>2.5</sub>	(8)				
276 - 282	No. 2 Bulk Storage Bins	Vinyl Acetate	21.73	19.50 (9)	2, 4, 5, 6, 7	2, 3, 4, 5, 6, 7	2, 6
		Ethylene	32.00	118.00 (9)			
		Propylene	1.54	4.67			
		Ethyl Acrylate	0.01	0.01			

Major NSR Summary Table

Permit Numbers: 2023 and PSDTX118M4					Issuance Date: May 3, 2024		
Emission Point No. (1)	Source Name (2)	Air Contaminant Name (3)	Emission Rates		Monitoring and Testing Requirements	Recordkeeping Requirements	Reporting Requirements
			lb/hr	TPY (4)	Special Condition/Application Information	Special Condition/Application Information	Special Condition/Application Information
		Acetone	0.58	0.62			
		PM	2.05	8.98			
		PM <sub>10</sub>	2.05	8.98			
		PM <sub>2.5</sub>	2.05	8.98			
A-299	No. 1 Dryer Sampler Filter	PM	0.01	0.01	6, 7	6, 7	6
		PM <sub>10</sub>	0.01	0.01			
		PM <sub>2.5</sub>	0.01	0.01			
A-300	No. 2 Dryer Sampler Filter	PM	0.01	0.01	6, 7	6, 7	6
		PM <sub>10</sub>	0.01	0.01			
		PM <sub>2.5</sub>	0.01	0.01			
410	No. 1 Fines Streamer Filter	PM	0.01	0.01	6, 7	3, 6, 7	6
		PM <sub>10</sub>	0.01	0.01			
		PM <sub>2.5</sub>	0.01	0.01			
411	No. 2 Fines Streamer Filter	PM	0.01	0.01	6, 7	3, 6, 7	6
		PM <sub>10</sub>	0.01	0.01			
		PM <sub>2.5</sub>	0.01	0.01			
413	PND catalyst Feed Tank	VOC	0.45	0.01	17	17	

Major NSR Summary Table

Permit Numbers: 2023 and PSDTX118M4					Issuance Date: May 3, 2024		
Emission Point No. (1)	Source Name (2)	Air Contaminant Name (3)	Emission Rates		Monitoring and Testing Requirements	Recordkeeping Requirements	Reporting Requirements
			lb/hr	TPY (4)	Special Condition/Application Information	Special Condition/Application Information	Special Condition/Application Information
546	Vulcanizables Fines Separator Dust Collector	PM	0.20	0.94	6, 7	3, 6, 7	6
		PM <sub>10</sub>	0.20	0.94			
		PM <sub>2.5</sub>	0.20	0.94			
547	Vulcanizables Preheat Bin	PM	0.30	0.55	6, 7	3, 6, 7	6
		PM <sub>10</sub>	0.30	0.55			
		PM <sub>2.5</sub>	0.30	0.55			
548	Vulcanizables Peroxide Tank	Acetophenone(12)	4.92	0.88	17	17	
		Cumene (12)	1.23	0.3			
		Phenol (12)	1.23	0.3			
		Toluene (12)	0.01	0.01			
		VOC	12.33	2.19			
549	Vulcanizables Holding Bin	Acetophenone (12)	2.00	8.76			
		Cumene (12)	0.50	2.19			
		Phenol (12)	0.50	2.19			
		Toluene (12)	0.01	0.01			
		VOC	5.00	21.9			
552 and 553		PM	0.12	0.11	6, 7	3, 6, 7	6

### Major NSR Summary Table

Permit Numbers: 2023 and PSDTX118M4					Issuance Date: May 3, 2024		
Emission Point No. (1)	Source Name (2)	Air Contaminant Name (3)	Emission Rates		Monitoring and Testing Requirements	Recordkeeping Requirements	Reporting Requirements
			lb/hr	TPY (4)	Special Condition/Application Information	Special Condition/Application Information	Special Condition/Application Information
	Vulcanizables Cooling Bin Nos. 1 and 2	PM <sub>10</sub>	0.12	0.11			
		PM <sub>2.5</sub>	0.12	0.11			
		VOC	(10)	(10)			
562	Mineral Spirits Tank	VOC	0.23	0.01	17	17	
563	Propylene Unloading Process Fugitives (5)	VOC	0.05	0.23	9	9	
669	Anti-Oxidant Mix Tank	Acetone	8.76	0.11	17	17	
		VOC	2.74	0.08			
670	East A/O Run Tank	Acetone	4.38	0.15	17	17	
671	West Vinyl Acetate Run Tank	VOC	2.74	0.10	17	17	
672	Old Run Tank	Acetone	1.97	0.03	17	17	
		Vinyl Acetate	1.54	0.02			
1004	Vulcanizables Fines SeparatorBaghouse	PM	0.20	0.94	6, 7	3, 6, 7	6
		PM <sub>10</sub>	0.20	0.94			
		PM <sub>2.5</sub>	0.20	0.94			
1011	No. 1 Process Analyzer Vent	VOC	0.01	0.01			

Major NSR Summary Table

Permit Numbers: 2023 and PSDTX118M4					Issuance Date: May 3, 2024		
Emission Point No. (1)	Source Name (2)	Air Contaminant Name (3)	Emission Rates		Monitoring and Testing Requirements	Recordkeeping Requirements	Reporting Requirements
			lb/hr	TPY (4)	Special Condition/Application Information	Special Condition/Application Information	Special Condition/Application Information
1012	No. 2 Process Analyzer Vent	VOC	0.01	0.01			
1021	Vulcanizables Feeder Vent	PM	0.01	0.01	6, 7	6, 7	6
		PM <sub>10</sub>	0.01	0.01			
		PM <sub>2.5</sub>	0.01	0.01			
1039	Vulcanizables Blender Vent	VOC	(10)	(10)		3	
1041	Cooling Tower	VOC	0.42	1.84	2, 14, 15	2, 14, 15	2
		PM	0.11	0.49			
		PM <sub>10</sub>	0.11	0.49			
		PM <sub>2.5</sub>	0.11	0.49			
1051	Process Analyzer Combined Vent	CO	0.01	0.01			
		VOC	0.01	0.01			
1058	Vulcanizables Product Area Baghouse	PM	0.20	0.94	6, 7	3, 6, 7	6
		PM <sub>10</sub>	0.20	0.94			
		PM <sub>2.5</sub>	0.20	0.94			
1059	No. 1 Classifier Sampler Filter	PM	0.01	0.01	6, 7	6, 7	6
		PM <sub>10</sub>	0.01	0.01			

## Major NSR Summary Table

Permit Numbers: 2023 and PSDTX118M4					Issuance Date: May 3, 2024		
Emission Point No. (1)	Source Name (2)	Air Contaminant Name (3)	Emission Rates		Monitoring and Testing Requirements	Recordkeeping Requirements	Reporting Requirements
			lb/hr	TPY (4)	Special Condition/Application Information	Special Condition/Application Information	Special Condition/Application Information
		PM <sub>2.5</sub>	0.01	0.01			
1060	No. 2 Classifier Sampler Filter	PM	0.01	0.01	6, 7	6, 7	6
		PM <sub>10</sub>	0.01	0.01			
		PM <sub>2.5</sub>	0.01	0.01			
1061	Vulcanizables Transfer Filter	PM	0.01	0.01	6, 7	3, 6, 7	6
		PM <sub>10</sub>	0.01	0.01			
		PM <sub>2.5</sub>	0.01	0.01			
1177	Analyzer Vent	VOC	0.03	0.13			

- (1) Emission point identification - either specific equipment designation or emission point number from plot plan.
- (2) Specific point source name. For fugitive sources, use area name or fugitive source name.
- (3)
  - CO - carbon monoxide
  - NO<sub>x</sub> - total oxides of nitrogen
  - PM - particulate matter, suspended in the atmosphere, including PM<sub>10</sub> and PM<sub>2.5</sub>, as represented
  - PM<sub>10</sub> - particulate matter equal to or less than 10 microns in diameter, including PM<sub>2.5</sub>, as represented
  - PM<sub>2.5</sub> - particulate matter equal to or less than 2.5 microns in diameter
  - VOC - volatile organic compounds as defined in Title 30 Texas Administrative Code § 101.1
- (4) Compliance with annual emission limits (tons per year) is based on a 12 month rolling period.
- (5) Emission rate is an estimate and compliance is demonstrated by meeting the requirements of the applicable special conditions and permit application representations.
- (6) Annual emission limits for the VOC from EPNs 253 through 268 are reflected in the emission rates for EPNs 261 through 268. The hourly and annual PM emissions from EPNs 254 through 268 are reflected in the emission rates for EPNs 261 through 268.
- (7) Total VOC emissions from EPNs 253 through 268 are not to exceed 124.1 tons per year (tpy).
- (8) Annual emission limits for the VOC from EPNs 270 through 282 are reflected in the emission rates for EPNs 276 through 282. The hourly and annual PM emissions from EPNs 271 through 282 are reflected in the emission rates for EPNs 276 through 282.
- (9) Total VOC emissions from EPNs 270 through 282 are not to exceed 118 tpy.
- (10) The VOC emissions from this source are accounted for at EPN 549.
- (11) Emissions from this flare are only from these permitted facilities.



- (12) The allowable emission rates listed for individual VOC species from this EPN are included in the total VOC emission rates.
- (13) Annual MSS emissions of individual VOC species for Fuel Gas Burn System including furnace gas header shutdowns/maintenance are limited as indicated. The allowable emission rates listed for individual MSS VOC species from this EPN are included in the Flare 246 total MSS VOC emission rates.
- (14) SO<sub>2</sub> emissions from the combustion of supplemental natural gas are authorized under NSR Permit No.1567.

## Texas Commission on Environmental Quality

Title V Existing

2026

### Site Information (Regulated Entity)

What is the name of the permit area to be authorized?	HIGH PRESSURE II UNIT
County	CALHOUN
Latitude (N) (##.#####)	28.516388
Longitude (W) (-###.#####)	96.768055
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)?	RN102181526
What is the name of the Regulated Entity (RE)?	UCC SEADRIFT OPERATIONS
Does the RE site have a physical address?	Yes
Physical Address	
Number and Street	7501 STATE HIGHWAY 185 N
City	SEADRIFT
State	TX
ZIP	77983
County	CALHOUN
Latitude (N) (##.#####)	28.515
Longitude (W) (-###.#####)	-96.771666
Facility NAICS Code	
What is the primary business of this entity?	MANUFACTURING ORGANIC CHEMICALS & THERMOPLASTIC RE

### Customer (Applicant) Information

How is this applicant associated with this site?	Owner Operator
What is the applicant's Customer Number (CN)?	CN601688781
Type of Customer	Corporation
Full legal name of the applicant:	
Legal Name	Union Carbide Corporation
Texas SOS Filing Number	1335606
Federal Tax ID	980626782
State Franchise Tax ID	11314217305
State Sales Tax ID	
Local Tax ID	
DUNS Number	1289008
Number of Employees	101-250
Independently Owned and Operated?	No

## Responsible Official Contact

Person TCEQ should contact for questions about this application:

Organization Name	THE DOW CHEMICAL COMPANY
Prefix	MS
First	HEATHER
Middle	
Last	LYONS
Suffix	
Credentials	
Title	LEAD SITE MANUFACTURING DIRECTOR
Enter new address or copy one from list:	
Mailing Address	
Address Type	Domestic
Mailing Address (include Suite or Bldg. here, if applicable)	PO BOX 186
Routing (such as Mail Code, Dept., or Attn:)	
City	PORT LAVACA
State	TX
ZIP	77979
Phone (###-###-####)	3615532769
Extension	
Alternate Phone (###-###-####)	
Fax (###-###-####)	
E-mail	hlyons@dow.com

## Technical Contact

Person TCEQ should contact for questions about this application:

Select existing TC contact or enter a new contact.	SHAWN PENA(THE DOW CHEMICA... )
Organization Name	THE DOW CHEMICAL COMPANY
Prefix	MR
First	SHAWN
Middle	
Last	PENA
Suffix	
Credentials	
Title	ENVIRONMENTAL SPECIALIST
Enter new address or copy one from list:	
Mailing Address	
Address Type	Domestic
Mailing Address (include Suite or Bldg. here, if applicable)	PO BOX 186
Routing (such as Mail Code, Dept., or Attn:)	
City	PORT LAVACA
State	TX
ZIP	77979
Phone (###-###-####)	3615533401

Extension

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

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

E-mail

Shawn.Pena@dow.com

## Title V General Information - Existing

1) Permit Type:	SOP
2) Permit Latitude Coordinate:	28 Deg 30 Min 59 Sec
3) Permit Longitude Coordinate:	96 Deg 46 Min 5 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?	Renewal
4.1.1. Are there any permits that should be voided upon issuance of this permit application through permit conversion?	No
4.1.2. Are there any permits that should be voided upon issuance of this permit application through permit consolidation?	No
5) 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)

[File Properties]

File Name	<a href=/ePermitsExternal/faces/file?fileId=250933>OP-REQ1.pdf</a>
Hash	D4ED9E6A03B2CE598B070A11178408DABB0D377900500B5D9A1705F419E3CBA1
MIME-Type	application/pdf

Attach OP-REQ2 (Negative Applicable Requirement Determinations)

Attach OP-REQ3 (Applicable Requirements Summary)

Attach OP-PBRSUP (Permits by Rule Supplemental Table)

[File Properties]

File Name	<a href=/ePermitsExternal/faces/file?fileId=250936>OP-PBRSUP.pdf</a>
Hash	F0E6CB56972C821EAC4B49D870275557D4131A167DC8C75C9ED69B8709882561
MIME-Type	application/pdf

Attach OP-SUMR (Individual Unit Summary for Revisions)

[File Properties]

File Name	<a href=/ePermitsExternal/faces/file?fileId=250941>OP-SUMR.pdf</a>
Hash	F4572272BBBDB858366510BF667D87AF586431F1EEE21EFEBBC8EE1BFB76CF00
MIME-Type	application/pdf

Attach OP-MON (Monitoring Requirements)

Attach OP-UA (Unit Attribute) Forms

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

Attach OP-CRO2 (Change of Responsible Official Information)

Attach OP-DEL (Delegation of Responsible Official)

Attach any other necessary information needed to complete the permit.

[File Properties]

File Name	<a href=/ePermitsExternal/faces/file?fileId=250935>O2026 Renewal Application.pdf</a>
Hash	D7330013339945966BDC2B9168D67248134545BD6938EAF2A36805ACD013EF0D
MIME-Type	application/pdf

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

[File Properties]

File Name	<a href=/ePermitsExternal/faces/file?fileId=250942>Major NSR Summary Table Permit 2023.pdf</a>
Hash	6636BF7A9D9B3F36F3B91692957028CD9686C4C06594D9FBC35E7337D031834F
MIME-Type	application/pdf

## 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 Responsible Official 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 Heather R Lyons, the owner of the STEERS account ER113250.
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 2026.
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: Heather R Lyons OWNER OPERATOR

Account Number:	ER113250
Signature IP Address:	170.85.99.6
Signature Date:	2025-04-11
Signature Hash:	657ECF2218701B57B359E682F562B62B0417039A82B1E85412D296153FAF0557
Form Hash Code at time of Signature:	2665EC195A8AF50C659627D8585F04486FCE8FA8D1C4B3AB6289051FD6FC0C6E

Submission

Reference Number:	The application reference number is 777750
Submitted by:	The application was submitted by ER113250/Heather R Lyons
Submitted Timestamp:	The application was submitted on 2025-04-11 at 11:32:12 CDT
Submitted From:	The application was submitted from IP address 170.85.99.6
Confirmation Number:	The confirmation number is 645734
Steers Version:	The STEERS version is 6.89
Permit Number:	The permit number is 2026

Additional Information

Application Creator: This account was created by Shawn Pena



04/11/2025

*Electronic Submittal via ePermits*

Ms. Jasmine Yuan  
TCEQ Air Permits Initial Review Team (APIRT), MC-161  
P.O. Box 13087  
Austin, TX 78711-3087

**Union Carbide Corporation, Seadrift Operations**  
**CN601688781; RN102181526**  
**High Pressure II - Title V Operating Permit O2026**  
**Renewal Application**

To whom it may concern,

The Dow Chemical Company is submitting the Title V Operating Permit O2026 Renewal Application for the Union Carbide Corporation Seadrift Operations Site located in Calhoun County, Texas in accordance with 30 TAC Chapter 122, Subchapter, C §122.241.

This renewal application is intended to be combined with the ongoing minor permit revision project No. 37269 with Jasmine Yuan from the Air Permits Division.

For future correspondence regarding this renewal application, I can be contacted via phone at (361)-553-3401 or e-mail at shawn.pena@dow.com.

Sincerely,

*Shawn Pena*

Shawn Pena  
Environmental Specialist

enclosure

cc:  
TCEQ Air Section Manager, Region 14

# Application Area-Wide Applicability Determinations and General Information

## Form OP-REQ1 (Page 86)

### Federal Operating Permit Program

### Texas Commission on Environmental Quality

Date	Permit No.	Regulated Entity No.
04/11/2025	O-2026	RN102181526

For SOP applications, answer ALL questions unless otherwise directed.

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

XII. New Source Review (NSR) Authorizations (continued)		
B. Air Quality Standard Permits		
◆ 1.	The application area includes at least one Air Quality Standard Permit NSR authorization. <i>If the response to XII.B.1 is "No," go to Section XII.C. If the response to XII.B.1 is "Yes," be sure to include the standard permit's registration numbers in Section XII.H and answer XII.B.2 - B.16 as appropriate.</i>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
◆ 2.	The application area includes at least one "State Pollution Control Project" Air Quality Standard Permit NSR authorization under 30 TAC § 116.617.	<input type="checkbox"/> Yes <input type="checkbox"/> No
◆ 3.	The application area includes at least one non-rule Air Quality Standard Permit for Pollution Control Projects NSR authorization.	<input type="checkbox"/> Yes <input type="checkbox"/> No
◆ 4.	The application area includes at least one "Installation and/or Modification of Oil and Gas Facilities" Air Quality Standard Permit NSR authorization under 30 TAC § 116.620.	<input type="checkbox"/> Yes <input type="checkbox"/> No
◆ 5.	The application area includes at least one non-rule Air Quality Standard Permit for Oil and Gas Handling and Production Facilities NSR authorization.	<input type="checkbox"/> Yes <input type="checkbox"/> No
◆ 6.	The application area includes at least one "Municipal Solid Waste Landfill" Air Quality Standard Permit NSR authorization under 30 TAC § 116.621.	<input type="checkbox"/> Yes <input type="checkbox"/> No
◆ 7.	The application area includes at least one "Municipal Solid Waste Landfill Facilities and Transfer Stations" Standard Permit authorization under 30 TAC Chapter 330, Subchapter U.	<input type="checkbox"/> Yes <input type="checkbox"/> No
8.	The application area includes at least one "Concrete Batch Plant" Air Quality Standard Permit NSR authorization.	<input type="checkbox"/> Yes <input type="checkbox"/> No
9.	The application area includes at least one "Concrete Batch Plant with Enhanced Controls" Air Quality Standard Permit NSR authorization.	<input type="checkbox"/> Yes <input type="checkbox"/> No
10.	The application area includes at least one "Hot Mix Asphalt Plant" Air Quality Standard Permit NSR authorization.	<input type="checkbox"/> Yes <input type="checkbox"/> No



# Application Area-Wide Applicability Determinations and General Information

## Form OP-REQ1 (Page 87)

### Federal Operating Permit Program

### Texas Commission on Environmental Quality

Date	Permit No.	Regulated Entity No.
04/11/2025	O-2026	RN102181526

For SOP applications, answer ALL questions unless otherwise directed.

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

XII. New Source Review (NSR) Authorizations (continued)		
B. Air Quality Standard Permits (continued)		
◆ 11.	The application area includes at least one "Rock Crusher" Air Quality Standard Permit NSR authorization.	<input type="checkbox"/> Yes <input type="checkbox"/> No
◆ 12.	The application area includes at least one "Electric Generating Unit" Air Quality Standard Permit NSR authorization. <i>If the response to XII.B.12 is "No," go to Question XII.B.15.</i>	<input type="checkbox"/> Yes <input type="checkbox"/> No
◆ 13.	For purposes of "Electric Generating Unit" Air Quality Standard Permit, the application area is located in the East Texas Region.	<input type="checkbox"/> Yes <input type="checkbox"/> No
◆ 14.	For purposes of "Electric Generating Unit" Air Quality Standard Permit, the application area is located in the West Texas Region.	<input type="checkbox"/> Yes <input type="checkbox"/> No
◆ 15.	The application area includes at least one "Boiler" Air Quality Standard Permit NSR authorization.	<input type="checkbox"/> Yes <input type="checkbox"/> No
◆ 16.	The application area includes at least one "Sawmill" Air Quality Standard Permit NSR authorization.	<input type="checkbox"/> Yes <input type="checkbox"/> No
C. Flexible Permits		
1.	The application area includes at least one Flexible Permit NSR authorization.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
D. Multiple Plant Permits		
1.	The application area includes at least one Multi-Plant Permit NSR authorization.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No

**Application Area-Wide Applicability Determinations and General Information**  
**Form OP-REQ1 (Page 88)**  
**Federal Operating Permit Program**  
**Texas Commission on Environmental Quality**

Date	Permit No.	Regulated Entity No.
04/11/2025	O-2026	RN102181526

For SOP applications, answer ALL questions unless otherwise directed.

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

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

**E. PSD Permits and PSD Major Pollutants**

Permit No.	Issuance Date	Pollutant(s):	Permit No.	Issuance Date	Pollutant(s):
PSDTX118M4	05/03/2024	VOC, CO, NOX, PM, PM10, PM2.5			

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](http://www.tceq.texas.gov/permitting/air/titlev/site/site_experts.html).

**F. Nonattainment (NA) Permits and NA Major Pollutants**

Permit No.	Issuance Date	Pollutant(s):	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](http://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
2023	05/03/2024				

**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.
04/11/2025	O-2026	RN102181526

For SOP applications, answer ALL questions unless otherwise directed.

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

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

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

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

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

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

PBR No.	Version No./Date	PBR No.	Version No./Date	PBR No.	Version No./Date
106.261	11/01/2003				
106.262	11/01/2003				
106.263	11/01/2001				
106.472	09/04/2000				
106.495	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

**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.
04/11/25	O2026	RN102181526

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
	2	1039	OP-UA15	BLENDER VENT		2023	PSDTX118M4
	2	1041	OP-UA13	COOLING TOWER		2023	PSDTX118M4
	2	253	OP-UA15	#1 REACTION EXTRUDER DRIER		2023 106.264/09/04/2000	PSDTX118M4
	2, 4	254	OP-UA15	#1 REACTION PRIMARY STORAGE BIN		2023 106.261/11/01/2003 [118024] 106.262/11/01/2003 [118024]	PSDTX118M4
	2, 4	255	OP-UA15	#1 REACTION PRIMARY STORAGE BIN		2023 106.261/11/01/2003 [118024] 106.262/11/01/2003 [118024]	PSDTX118M4
	2, 4	256	OP-UA15	#1 REACTION PRIMARY STORAGE BIN		2023 106.261/11/01/2003 [118024] 106.262/11/01/2003 [118024]	PSDTX118M4
	2, 4	257	OP-UA15	#1 REACTION PRIMARY STORAGE BIN		2023 106.261/11/01/2003 [118024] 106.262/11/01/2003 [118024]	PSDTX118M4
	2, 4	258	OP-UA15	#1 REACTION PRIMARY STORAGE BIN		2023 106.261/11/01/2003 [118024] 106.262/11/01/2003 [118024]	PSDTX118M4

TCEQ-10344 (APDG 5767v7, Revised 05/20) OP-SUMR

This form is for use by facilities subject to air quality permit requirements and may be revised periodically.

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**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.
04/11/25	O2026	RN102181526

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
	2, 4	259	OP-UA15	#1 REACTION PRIMARY STORAGE BIN		2023 106.261/11/01/2003 [118024] 106.262/11/01/2003 [118024]	PSDTX118M4
	2, 4	260	OP-UA15	#1 REACTION PRIMARY STORAGE BIN		2023 106.261/11/01/2003 [118024] 106.262/11/01/2003 [118024]	PSDTX118M4
	2, 4	261	OP-UA15	BULK STORAGE BIN		2023 106.261/11/01/2003 [118024] 106.262/11/01/2003 [118024]	PSDTX118M4
	2, 4	262	OP-UA15	BULK STORAGE BIN		2023 106.261/11/01/2003 [118024] 106.262/11/01/2003 [118024]	PSDTX118M4
	2, 4	263	OP-UA15	BULK STORAGE BIN		2023 106.261/11/01/2003 [118024] 106.262/11/01/2003 [118024]	PSDTX118M4
	2, 4	264	OP-UA15	BULK STORAGE BIN		2023 106.261/11/01/2003 [118024] 106.262/11/01/2003 [118024]	PSDTX118M4
	2, 4	265	OP-UA15	BULK STORAGE BIN		2023 106.261/11/01/2003 [118024] 106.262/11/01/2003 [118024]	PSDTX118M4

**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.
04/11/25	O2026	RN102181526

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
	2, 4	266	OP-UA15	BULK STORAGE BIN		2023 106.261/11/01/2003 [118024] 106.262/11/01/2003 [118024]	PSDTX118M4
	2, 4	267	OP-UA15	BULK STORAGE BIN		2023 106.261/11/01/2003 [118024] 106.262/11/01/2003 [118024]	PSDTX118M4
	2, 4	268	OP-UA15	BULK STORAGE BIN		2023 106.261/11/01/2003 [118024] 106.262/11/01/2003 [118024]	PSDTX118M4
	2	270	OP-UA15	#2 REACTION EXTRUDER DRIER		2023	PSDTX118M4
	2, 4	271	OP-UA15	#2 REACTION PRIMARY STORAGE BIN		2023 106.261/11/01/2003 [118024] 106.262/11/01/2003 [118024]	PSDTX118M4
	2, 4	272	OP-UA15	#2 REACTION PRIMARY STORAGE BIN		2023 106.261/11/01/2003 [118024] 106.262/11/01/2003 [118024]	PSDTX118M4
	2, 4	273	OP-UA15	#2 REACTION PRIMARY STORAGE BIN		2023 106.261/11/01/2003 [118024] 106.262/11/01/2003 [118024]	PSDTX118M4

TCEQ-10344 (APDG 5767v7, Revised 05/20) OP-SUMR

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**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.
04/11/25	O2026	RN102181526

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
	2, 4	274	OP-UA15	#2 REACTION PRIMARY STORAGE BIN		2023 106.261/11/01/2003 [118024] 106.262/11/01/2003 [118024]	PSDTX118M4
	2, 4	275	OP-UA15	#2 REACTION PRIMARY STORAGE BIN		2023 106.261/11/01/2003 [118024] 106.262/11/01/2003 [118024]	PSDTX118M4
	2, 4	276	OP-UA15	#2 REACTION BULK STORAGE BIN		2023 106.261/11/01/2003 [118024] 106.262/11/01/2003 [118024]	PSDTX118M4
	2, 4	277	OP-UA15	#2 REACTION BULK STORAGE BIN		2023 106.261/11/01/2003 [118024] 106.262/11/01/2003 [118024]	PSDTX118M4
	2, 4	278	OP-UA15	#2 REACTION BULK STORAGE BIN		2023 106.261/11/01/2003 [118024] 106.262/11/01/2003 [118024]	PSDTX118M4
	2, 4	279	OP-UA15	#2 REACTION BULK STORAGE BIN		2023 106.261/11/01/2003 [118024] 106.262/11/01/2003 [118024]	PSDTX118M4
	2, 4	280	OP-UA15	#2 REACTION BULK STORAGE BIN		2023 106.261/11/01/2003 [118024] 106.262/11/01/2003 [118024]	PSDTX118M4

TCEQ-10344 (APDG 5767v7, Revised 05/20) OP-SUMR

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**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.
04/11/25	O2026	RN102181526

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
	2, 4	281	OP-UA15	#2 REACTION BULK STORAGE BIN		2023 106.261/11/01/2003 106.262/11/01/2003	PSDTX118M4
	2, 4	282	OP-UA15	#2 REACTION BULK STORAGE BIN		2023 106.261/11/01/2003 106.262/11/01/2003	PSDTX118M4
	2	284	OP-UA15	MIX TANK VENT		2023	PSDTX118M4
	2	289	OP-UA15	REFRIGERATED ISOPROPANOL TANK VENT		2023	PSDTX118M4
	1,2	2PURCOL	OP-UA15	NO. 2 PURGE COLUMN		2023	PSDTX118M4
	2	306	OP-UA15	SCRAP BIN		2023	PSDTX118M4
	2	414	OP-UA15	SCREEN PACK CLEANER/DIE PLATE CLEANER		106.495/09/04/2000	
	2	547	OP-UA15	PREHEAT BIN		2023	PSDTX118M4
	2	549	OP-UA15	HOLDING BIN		2023 106.261/11/01/2003 [108571] 106.262/11/01/2003 [108571]	PSDTX118M4
	2	552	OP-UA15	COOLING BIN		2023	PSDTX118M4

TCEQ-10344 (APDG 5767v7, Revised 05/20) OP-SUMR

This form is for use by facilities subject to air quality permit requirements and may be revised periodically.

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**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.
04/11/25	O2026	RN102181526

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
	2	553	OP-UA15	COOLING BIN		2023	PSDTX118M4
	1, 2	561	OP-UA3	INHIBITOR TANK		2023	PSDTX118M4
	2	669	OP-UA15	A/O MIX TANK		2023 106.472/09/04/2000	PSDTX118M4
	1, 2	EAVACOL	OP-UA15	EA/VA REMOVAL COLUMN		2023	PSDTX118M4
	1, 2	FGSEP	OP-UA15	FURNACE GAS ENTRAINMENT SEPARATOR		2023	PSDTX118M4
	1, 2	HP2FUGS	OP-UA1 OP-UA12	FUGITIVE EMISSIONS		2023 106.261/11/01/2003	PSDTX118M4
	1, 2	ISOCOL	OP-UA15	ISO COLUMN C-901 OVERHEAD		2023	PSDTX118M4

**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.
04/11/25	O2026	RN102181526

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
	3, 4	RX2EXTR1	OP-UA15	HP-2 RX2 EXTRUDER SEAL NO. 1		2023	PSDTX118M4
	3, 4	RX2EXTR2	OP-UA15	HP-2 RX2 EXTRUDER SEAL NO. 2		2023	PSDTX118M4
	2	SDL15	OP-UA1 OP-UA4	HP2 PROPYLENE UNLOADING		2023	PSDTX118M4
	2	SDL16	OP-UA1 OP-UA4	HP2 ISOPROPANOL TANK TRUCK UNLOADING		2023	PSDTX118M4
	2	SDL17	OP-UA1 OP-UA4	HP2 ETHYL ACRYLATE/VINYL ACETATE TANK CAR UNLOADING		2023	PSDTX118M4
	2	UNLDGLOW	OP-UA4	LOW VAPOR PRESSURE VOC UNLOADING		2023	PSDTX118M4

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

**Table 2**

Date	Permit No.	Regulated Entity No.
04/11/25	O2026	RN102181526

Revision No.	ID No.	Applicable Form	Group AI	Group ID No.
2	1039	OP-UA15		GRPVENT2
2	253	OP-UA15		GRPVENT1B
2, 4	254	OP-UA15		GRPVENT1B
2, 4	255	OP-UA15		GRPVENT1B
2, 4	256	OP-UA15		GRPVENT1B
2, 4	257	OP-UA15		GRPVENT1B
2, 4	258	OP-UA15		GRPVENT1B
2, 4	259	OP-UA15		GRPVENT1B
2, 4	260	OP-UA15		GRPVENT1B
2, 4	261	OP-UA15		GRPVENT1B
2, 4	262	OP-UA15		GRPVENT1B
2,4	263	OP-UA15		GRPVENT1B

TCEQ-10344 (APDG 5767v7, Revised 05/20) OP-SUMR

This form is for use by facilities subject to air quality permit requirements and may be revised periodically.

Page \_\_\_\_ of \_\_\_\_

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

**Table 2**

Date	Permit No.	Regulated Entity No.
04/11/25	O2026	RN102181526

Revision No.	ID No.	Applicable Form	Group AI	Group ID No.
2, 4	264	OP-UA15		GRPVNT1B
2, 4	265	OP-UA15		GRPVNT1B
2, 4	266	OP-UA15		GRPVNT1B
2, 4	267	OP-UA15		GRPVNT1B
2, 4	268	OP-UA15		GRPVNT1B
2	270	OP-UA15		GRPVNT1B
2, 4	271	OP-UA15		GRPVNT1B
2, 4	272	OP-UA15		GRPVNT1B
2, 4	273	OP-UA15		GRPVNT1B
2, 4	274	OP-UA15		GRPVNT1B
2, 4	275	OP-UA15		GRPVNT1B
2, 4	276	OP-UA15		GRPVNT1B

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

**Table 2**

Date	Permit No.	Regulated Entity No.
04/11/25	O2026	RN102181526

Revision No.	ID No.	Applicable Form	Group AI	Group ID No.
2, 4	277	OP-UA I 5		GRPVNT1B
2, 4	278	OP-UA15		GRPVNT1B
2, 4	279	OP-UA15		GRPVNT1B
2, 4	280	OP-UA15		GRPVNT1B
2, 4	281	OP-UA15		GRPVNT1B
2, 4	282	OP-UA15		GRPVNT1B
2, 4	284	OP-UA I 5		GRPVENT2
2, 4	289	OP UA15		GRPVENT2
1, 2	2PURCOL	OP-UA15		GRP-MONCVNT
2	306	OP-UA 15		GRPVNT1B
2	414	OP-UA15		GRPVENT2
2	547	OP-UA15		GRPVENT2

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

**Table 2**

Date	Permit No.	Regulated Entity No.
04/11/25	O2026	RN102181526

Revision No.	ID No.	Applicable Form	Group AI	Group ID No.
2	549	OP-UA15		GRPVENT1
2	552	OP-UA15		GRPVENT1
2	553	OP-UA15		GRPVENT1
2	669	OP-UA 15		GRPVENT2
1, 2	EAVACOL	OP-UA 15		GRP-MONCVNT
1, 2	FGSEP	OP-UA15		GRP-MONCVNT
1, 2	ISOCOL	OP-UA15		GRP-MONCVNT
3, 4	RX2EXTR1	OP-UA15		GRPVENT2
3, 4	RX2EXTR2	OP-UA15		GRPVENT2
2	SDL15	OP-UA1 OP-UA4		GRPUNLDGHI
2	SDL16	OP-UA1 OP-UA4		GRPUNLDGHI

**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
04/11/25	O2026	RN102181526

Unit ID No.	Registration No.	PBR No.	Registration Date
246, 251, 269	169847	PBR 106.261 PBR 106.476	09/15/2022
254-268 and 271-282	118024	PBR 106.261 PBR 106.262	05/30/2014
1245, 549	108571	PBR 106.261 PBR 106.262	07/10/2013
251, 269	84497	PBR 106.261	05/06/2008
246	90957	PBR 106.261 PBR 106.262	10/27/2009

**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
04/11/25	O2026	RN102181526

Unit ID No.	PBR No.	Version No./Date
669, 672	PBR 106.472	09/04/2000
414	PBR 106.495	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

PBR No.	Version No./Date
N/A	N/A
N/A	N/A
N/A	N/A
N/A	N/A
N/A	N/A
N/A	N/A
N/A	N/A
N/A	N/A
N/A	N/A
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
04/11/25	O2026	RN102181526

Unit ID No.	PBR No.	Version No./Date Or Registration No.	Monitoring Requirement
246, 251, 269	PBR 106.261 PBR 106.476	169847	Hours of online time for equipment are tracked. Monitoring is performed for fugitive emission components.
254-268 and 271-282	PBR 106.261 PBR 106.262	118024	Production throughput for bins is tracked.
1245, 549	PBR 106.261 PBR 106.262	108571	Production throughput for equipment is tracked.
669, 672	PBR 106.472	09/04/2000	Throughput for equipment is tracked.
414	PBR 106.495	09/04/2000	Hours of operating for screenpack burner is tracked.
251, 269	PBR 106.261	84497	Equipment is monitored under fugitive emission program.
246	PBR 106.261 PBR 106.262	90957	Throughput of vinyl acetate is tracked.

### Major NSR Summary Table

Permit Numbers: 2023 and PSDTX118M4					Issuance Date: May 3, 2024		
Emission Point No. (1)	Source Name (2)	Air Contaminant Name (3)	Emission Rates		Monitoring and Testing Requirements	Recordkeeping Requirements	Reporting Requirements
			lb/hr	TPY (4)	Special Condition/Application Information	Special Condition/Application Information	Special Condition/Application Information
246	Flare (11)(14)	Acetone	0.03	0.02	2, 13	2, 3, 13	2, 13
		CO	25.65	16.74			
		NOx	4.97	3.24			
		Ethylene (12)	28.60	20.47			
		Vinyl Acetate (12)	1.51	1.6			
		Ethyl Acrylate (12)	1.20	0.04			
		Propylene (12)	6.96	2.66			
		Toluene (12)	0.01	0.01			
		VOC	38.35	24.83			
246	Flare Maintenance, Start-Up, and Shutdown Emissions (MSS) only (11)(14)	Acetone	0.02	0.01	11, 13	11, 13	13
		CO	158.87	12.29			
		NOx	31.18	2.41			
		VOC	260.53	18.02			
		Ethylene (13)		7.42			
		Propylene (13)		0.50			
		Vinyl Acetate (13)		0.01			
		Ethyl Acrylate (13)		0.01			

### Major NSR Summary Table

Permit Numbers: 2023 and PSDTX118M4					Issuance Date: May 3, 2024		
Emission Point No. (1)	Source Name (2)	Air Contaminant Name (3)	Emission Rates		Monitoring and Testing Requirements	Recordkeeping Requirements	Reporting Requirements
			lb/hr	TPY (4)	Special Condition/Application Information	Special Condition/Application Information	Special Condition/Application Information
		Vinyltrimethoxysilane (13)		0.01			
		Mineral Spirits (13)		0.01			
251	Reactor No. 1 Process Fugitives (5)	Acetone	0.07	0.29	2, 9	2, 9 12	2
		CO	0.01	0.01			
		VOC	9.36	41.00			
252	No. 1 Cyclone Scrubber Vent	VOC	0.06	0.01		3	
253	No. 1 Extruder Drier	Vinyl Acetate	7.00	(6)	4, 5, 6, 7	3, 4, 5, 6, 7	6
		Ethylene	4.00	(6)			
		Propylene	0.20	(6)			
		Ethyl Acrylate	0.01	(6)			
		Acetone	0.07	(6)			
		PM	1.30	5.69			
		PM <sub>10</sub>	1.30	5.69			
		PM <sub>2.5</sub>	1.30	5.69			
254 - 260	No. 1 Primary Storage Bins	Vinyl Acetate	21.73	(6)	2, 4, 5, 6, 7	2, 3, 4, 5, 6, 7	2, 6
		Ethylene	32.00	(6)			

Major NSR Summary Table

Permit Numbers: 2023 and PSDTX118M4					Issuance Date: May 3, 2024		
Emission Point No. (1)	Source Name (2)	Air Contaminant Name (3)	Emission Rates		Monitoring and Testing Requirements	Recordkeeping Requirements	Reporting Requirements
			lb/hr	TPY (4)	Special Condition/Application Information	Special Condition/Application Information	Special Condition/Application Information
		Propylene	1.54	(6)			
		Ethyl Acrylate	0.01	(6)			
		Acetone	0.58	(6)			
		PM		(6)			
		PM <sub>10</sub>		(6)			
		PM <sub>2.5</sub>		(6)			
261 - 268	No. 1 Bulk Storage Bins	Vinyl Acetate	21.73	19.50 (7)	2, 4, 5, 6, 7	2, 3, 4, 5, 6, 7	2, 6
		Ethylene	32.00	118.00 (7)			
		Propylene	1.54	4.67			
		Ethyl Acrylate	0.01	0.01			
		Acetone	0.58	0.62			
		PM	2.05	8.98			
		PM <sub>10</sub>	2.05	8.98			
		PM <sub>2.5</sub>	2.05	8.98			
269	Reactor No. 2 Process Fugitives (5)	CO	0.60	2.64	9	9, 12	
		VOC	6.16	26.99			
270	No. 2 Extruder Drier	Ethylene	4.00	(8)	4, 5, 6, 7	3, 4, 5, 6, 7	6

### Major NSR Summary Table

Permit Numbers: 2023 and PSDTX118M4					Issuance Date: May 3, 2024		
Emission Point No. (1)	Source Name (2)	Air Contaminant Name (3)	Emission Rates		Monitoring and Testing Requirements	Recordkeeping Requirements	Reporting Requirements
			lb/hr	TPY (4)	Special Condition/Application Information	Special Condition/Application Information	Special Condition/Application Information
		Propylene	0.20	(8)			
		Acetone	0.07	(8)			
		PM	1.30	5.69			
		PM <sub>10</sub>	1.30	5.69			
		PM <sub>2.5</sub>	1.30	5.69			
271 - 275	No. 2 Primary Storage Bins	Vinyl Acetate	21.73	(8)	2, 4, 5, 6, 7	2, 3, 4, 5, 6, 7	2, 6
		Ethylene	32.00	(8)			
		Propylene	1.54	(8)			
		Ethyl Acrylate	0.01	(8)			
		Acetone	0.58	(8)			
		PM	(8)				
		PM <sub>10</sub>	(8)				
		PM <sub>2.5</sub>	(8)				
276 - 282	No. 2 Bulk Storage Bins	Vinyl Acetate	21.73	19.50 (9)	2, 4, 5, 6, 7	2, 3, 4, 5, 6, 7	2, 6
		Ethylene	32.00	118.00 (9)			
		Propylene	1.54	4.67			
		Ethyl Acrylate	0.01	0.01			

Major NSR Summary Table

Permit Numbers: 2023 and PSDTX118M4					Issuance Date: May 3, 2024		
Emission Point No. (1)	Source Name (2)	Air Contaminant Name (3)	Emission Rates		Monitoring and Testing Requirements	Recordkeeping Requirements	Reporting Requirements
			lb/hr	TPY (4)	Special Condition/Application Information	Special Condition/Application Information	Special Condition/Application Information
		Acetone	0.58	0.62			
		PM	2.05	8.98			
		PM <sub>10</sub>	2.05	8.98			
		PM <sub>2.5</sub>	2.05	8.98			
A-299	No. 1 Dryer Sampler Filter	PM	0.01	0.01	6, 7	6, 7	6
		PM <sub>10</sub>	0.01	0.01			
		PM <sub>2.5</sub>	0.01	0.01			
A-300	No. 2 Dryer Sampler Filter	PM	0.01	0.01	6, 7	6, 7	6
		PM <sub>10</sub>	0.01	0.01			
		PM <sub>2.5</sub>	0.01	0.01			
410	No. 1 Fines Streamer Filter	PM	0.01	0.01	6, 7	3, 6, 7	6
		PM <sub>10</sub>	0.01	0.01			
		PM <sub>2.5</sub>	0.01	0.01			
411	No. 2 Fines Streamer Filter	PM	0.01	0.01	6, 7	3, 6, 7	6
		PM <sub>10</sub>	0.01	0.01			
		PM <sub>2.5</sub>	0.01	0.01			
413	PND catalyst Feed Tank	VOC	0.45	0.01	17	17	

### Major NSR Summary Table

Permit Numbers: 2023 and PSDTX118M4					Issuance Date: May 3, 2024		
Emission Point No. (1)	Source Name (2)	Air Contaminant Name (3)	Emission Rates		Monitoring and Testing Requirements	Recordkeeping Requirements	Reporting Requirements
			lb/hr	TPY (4)	Special Condition/Application Information	Special Condition/Application Information	Special Condition/Application Information
546	Vulcanizables Fines Separator Dust Collector	PM	0.20	0.94	6, 7	3, 6, 7	6
		PM <sub>10</sub>	0.20	0.94			
		PM <sub>2.5</sub>	0.20	0.94			
547	Vulcanizables Preheat Bin	PM	0.30	0.55	6, 7	3, 6, 7	6
		PM <sub>10</sub>	0.30	0.55			
		PM <sub>2.5</sub>	0.30	0.55			
548	Vulcanizables Peroxide Tank	Acetophenone(12)	4.92	0.88	17	17	
		Cumene (12)	1.23	0.3			
		Phenol (12)	1.23	0.3			
		Toluene (12)	0.01	0.01			
		VOC	12.33	2.19			
549	Vulcanizables Holding Bin	Acetophenone (12)	2.00	8.76			
		Cumene (12)	0.50	2.19			
		Phenol (12)	0.50	2.19			
		Toluene (12)	0.01	0.01			
		VOC	5.00	21.9			
552 and 553		PM	0.12	0.11	6, 7	3, 6, 7	6



### Major NSR Summary Table

Permit Numbers: 2023 and PSDTX118M4					Issuance Date: May 3, 2024		
Emission Point No. (1)	Source Name (2)	Air Contaminant Name (3)	Emission Rates		Monitoring and Testing Requirements	Recordkeeping Requirements	Reporting Requirements
			lb/hr	TPY (4)	Special Condition/Application Information	Special Condition/Application Information	Special Condition/Application Information
	Vulcanizables Cooling Bin Nos. 1 and 2	PM <sub>10</sub>	0.12	0.11			
		PM <sub>2.5</sub>	0.12	0.11			
		VOC	(10)	(10)			
562	Mineral Spirits Tank	VOC	0.23	0.01	17	17	
563	Propylene Unloading Process Fugitives (5)	VOC	0.05	0.23	9	9	
669	Anti-Oxidant Mix Tank	Acetone	8.76	0.11	17	17	
		VOC	2.74	0.08			
670	East A/O Run Tank	Acetone	4.38	0.15	17	17	
671	West Vinyl Acetate Run Tank	VOC	2.74	0.10	17	17	
672	Old Run Tank	Acetone	1.97	0.03	17	17	
		Vinyl Acetate	1.54	0.02			
1004	Vulcanizables Fines SeparatorBaghouse	PM	0.20	0.94	6, 7	3, 6, 7	6
		PM <sub>10</sub>	0.20	0.94			
		PM <sub>2.5</sub>	0.20	0.94			
1011	No. 1 Process Analyzer Vent	VOC	0.01	0.01			

Major NSR Summary Table

Permit Numbers: 2023 and PSDTX118M4					Issuance Date: May 3, 2024		
Emission Point No. (1)	Source Name (2)	Air Contaminant Name (3)	Emission Rates		Monitoring and Testing Requirements	Recordkeeping Requirements	Reporting Requirements
			lb/hr	TPY (4)	Special Condition/Application Information	Special Condition/Application Information	Special Condition/Application Information
1012	No. 2 Process Analyzer Vent	VOC	0.01	0.01			
1021	Vulcanizables Feeder Vent	PM	0.01	0.01	6, 7	6, 7	6
		PM <sub>10</sub>	0.01	0.01			
		PM <sub>2.5</sub>	0.01	0.01			
1039	Vulcanizables Blender Vent	VOC	(10)	(10)		3	
1041	Cooling Tower	VOC	0.42	1.84	2, 14, 15	2, 14, 15	2
		PM	0.11	0.49			
		PM <sub>10</sub>	0.11	0.49			
		PM <sub>2.5</sub>	0.11	0.49			
1051	Process Analyzer Combined Vent	CO	0.01	0.01			
		VOC	0.01	0.01			
1058	Vulcanizables Product Area Baghouse	PM	0.20	0.94	6, 7	3, 6, 7	6
		PM <sub>10</sub>	0.20	0.94			
		PM <sub>2.5</sub>	0.20	0.94			
1059	No. 1 Classifier Sampler Filter	PM	0.01	0.01	6, 7	6, 7	6
		PM <sub>10</sub>	0.01	0.01			

## Major NSR Summary Table

Permit Numbers: 2023 and PSDTX118M4					Issuance Date: May 3, 2024		
Emission Point No. (1)	Source Name (2)	Air Contaminant Name (3)	Emission Rates		Monitoring and Testing Requirements	Recordkeeping Requirements	Reporting Requirements
			lb/hr	TPY (4)	Special Condition/Application Information	Special Condition/Application Information	Special Condition/Application Information
		PM <sub>2.5</sub>	0.01	0.01			
1060	No. 2 Classifier Sampler Filter	PM	0.01	0.01	6, 7	6, 7	6
		PM <sub>10</sub>	0.01	0.01			
		PM <sub>2.5</sub>	0.01	0.01			
1061	Vulcanizables Transfer Filter	PM	0.01	0.01	6, 7	3, 6, 7	6
		PM <sub>10</sub>	0.01	0.01			
		PM <sub>2.5</sub>	0.01	0.01			
1177	Analyzer Vent	VOC	0.03	0.13			

- (1) Emission point identification - either specific equipment designation or emission point number from plot plan.
- (2) Specific point source name. For fugitive sources, use area name or fugitive source name.
- (3)
  - CO - carbon monoxide
  - NO<sub>x</sub> - total oxides of nitrogen
  - PM - particulate matter, suspended in the atmosphere, including PM<sub>10</sub> and PM<sub>2.5</sub>, as represented
  - PM<sub>10</sub> - particulate matter equal to or less than 10 microns in diameter, including PM<sub>2.5</sub>, as represented
  - PM<sub>2.5</sub> - particulate matter equal to or less than 2.5 microns in diameter
  - VOC - volatile organic compounds as defined in Title 30 Texas Administrative Code § 101.1
- (4) Compliance with annual emission limits (tons per year) is based on a 12 month rolling period.
- (5) Emission rate is an estimate and compliance is demonstrated by meeting the requirements of the applicable special conditions and permit application representations.
- (6) Annual emission limits for the VOC from EPNs 253 through 268 are reflected in the emission rates for EPNs 261 through 268. The hourly and annual PM emissions from EPNs 254 through 268 are reflected in the emission rates for EPNs 261 through 268.
- (7) Total VOC emissions from EPNs 253 through 268 are not to exceed 124.1 tons per year (tpy).
- (8) Annual emission limits for the VOC from EPNs 270 through 282 are reflected in the emission rates for EPNs 276 through 282. The hourly and annual PM emissions from EPNs 271 through 282 are reflected in the emission rates for EPNs 276 through 282.
- (9) Total VOC emissions from EPNs 270 through 282 are not to exceed 118 tpy.
- (10) The VOC emissions from this source are accounted for at EPN 549.
- (11) Emissions from this flare are only from these permitted facilities.

- (12) The allowable emission rates listed for individual VOC species from this EPN are included in the total VOC emission rates.
- (13) Annual MSS emissions of individual VOC species for Fuel Gas Burn System including furnace gas header shutdowns/maintenance are limited as indicated. The allowable emission rates listed for individual MSS VOC species from this EPN are included in the Flare 246 total MSS VOC emission rates.
- (14) SO<sub>2</sub> emissions from the combustion of supplemental natural gas are authorized under NSR Permit No.1567.