

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

All initial issuance, revision, renewal, and reopening permit application submittals requiring certification must be addressed using this form. Updates to site operating permit (SOP) and temporary operating permit (TOP) applications, other than public notice verification materials, must be certified prior to authorization of public notice or start of public announcement. Updates to general operating permit (GOP) applications must be certified prior to receiving an authorization to operate under a GOP.

<b>I. Identifying Information</b>	
RN: 102926920	
CN: 602805236	
Account No.: HG-1996-R	
Permit No.: O1373	
Project No.: N/A	
Area Name: Bayport EO Plant	
Company Name: INEOS Americas LLC	
<b>II. Certification Type</b> <i>(Please mark appropriate box)</i>	
<input checked="" type="checkbox"/> Responsible Official	<input type="checkbox"/> Duly Authorized Representative
<b>III. Submittal Type</b> <i>(Please mark appropriate box) (Only one response can be accepted per form)</i>	
<input type="checkbox"/> SOP/TOP Initial Permit Application	<input type="checkbox"/> Permit Revision, Renewal, or Reopening
<input type="checkbox"/> GOP Initial Permit Application	<input checked="" type="checkbox"/> Update to Permit Application
<input type="checkbox"/> Other: _____	

AIR PERMITS DIVISION  
*Heul* FEB 04 2026  
RECEIVED

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

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

<b>IV. Certification of Truth</b>
<b>This certification does not extend to information which is designated by TCEQ as information for reference only.</b>
I, <u>Kevin McGovern</u> certify that I am the <u>RO</u> <i>(Certifier Name printed or typed)</i> <span style="float: right;"><i>(RO or DAR)</i></span>
and that, based on information and belief formed after reasonable inquiry, the statements and information dated during the time period or on the specific date(s) below, are true, accurate, and complete: <i>Note: Enter Either a Time Period or Specific Date(s) for each certification. This section must be completed. The certification is not valid without documentation date(s).</i>
Time Period: From <u>September 3, 2025</u> to <u>February 2, 2026</u> <i>(Start Date)</i> <span style="margin-left: 150px;"><i>(End Date)</i></span>
Specific Dates: _____ <i>(Date 1)</i> <span style="margin-left: 50px;"><i>(Date 2)</i></span> <span style="margin-left: 100px;"><i>(Date 3)</i></span> <span style="margin-left: 100px;"><i>(Date 4)</i></span>
_____ <i>(Date 5)</i> <span style="margin-left: 100px;"><i>(Date 6)</i></span>
Signature: <u>Kevin McGovern</u> Signature Date: <u>2/2/26</u>
Title: <u>General Manager</u>

## Mark McDonald

---

**From:** Navy, Carlisa <carlisa.navy@ineos.com>  
**Sent:** Tuesday, February 3, 2026 4:12 PM  
**To:** Mark McDonald  
**Subject:** RE: TCEQ Working Draft Permit - O1373 INEOS Americas LLC (Minor, 38100)

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

Hello Mark,

The OP-CRO1 form with wet signature was mailed today via FedEx. Tracking number is 888454788590. It is scheduled to be delivered tomorrow around 10:30 am.

Thanks,

**INEOS**  
**Oxide**

**Carlisa Navy**

Environmental Engineer

INEOS Oxide  
5761 Underwood Road  
Pasadena, TX 77507

t: 281-474-0727

e: [carlisa.navy@ineos.com](mailto:carlisa.navy@ineos.com)

---

**From:** Mark McDonald <Mark.McDonald@tceq.texas.gov>  
**Sent:** Monday, February 2, 2026 3:16 PM  
**To:** Navy, Carlisa <carlisa.navy@ineos.com>  
**Subject:** RE: TCEQ Working Draft Permit - O1373 INEOS Americas LLC (Minor, 38100)

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Carlisa,  
The "Update to Permit Application" is good to use.

This all looks good, and I will get started on making the updates on my end. Send me a tracking number later if you are you going to ship these in hardcopy to the physical address, that I gave you earlier. If they are submitted via STEERS, I will get an update from the system.

Let me know if you have any questions.

Regards,  
Mark

---

**From:** Navy, Carlisa <[carlisa.navy@ineos.com](mailto:carlisa.navy@ineos.com)>  
**Sent:** Monday, February 2, 2026 2:24 PM  
**To:** Mark McDonald <[Mark.McDonald@tceq.texas.gov](mailto:Mark.McDonald@tceq.texas.gov)>  
**Subject:** RE: TCEQ Working Draft Permit - O1373 INEOS Americas LLC (Minor, 38100)

Mark,

Attached are the pdfs for the updated ACPS and OP-CRO1.

For Submittal Type on the OP-CRO1, I checked "Update to Permit Application". Please let me know if another choice should have been selected.

Thanks,

**INEOS**  
**Oxide**

**Carlisa Navy**

Environmental Engineer

INEOS Oxide  
5761 Underwood Road  
Pasadena, TX 77507

t: 281-474-0727

e: [carlisa.navy@ineos.com](mailto:carlisa.navy@ineos.com)

---

**From:** Mark McDonald <[Mark.McDonald@tceq.texas.gov](mailto:Mark.McDonald@tceq.texas.gov)>  
**Sent:** Friday, January 30, 2026 2:42 PM  
**To:** Navy, Carlisa <[carlisa.navy@ineos.com](mailto:carlisa.navy@ineos.com)>  
**Subject:** RE: TCEQ Working Draft Permit - O1373 INEOS Americas LLC (Minor, 38100)

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Thanks Carlisa,

I will work to date all of the documents for a Friday mailout. The pdfs will help me keep it all moving with data entry etc., so it will be ready to go.

Let me know if you have any other questions.

Regards,  
Mark

---

**From:** Navy, Carlisa <[carlisa.navy@ineos.com](mailto:carlisa.navy@ineos.com)>  
**Sent:** Friday, January 30, 2026 2:27 PM  
**To:** Mark McDonald <[Mark.McDonald@tceq.texas.gov](mailto:Mark.McDonald@tceq.texas.gov)>  
**Subject:** RE: TCEQ Working Draft Permit - O1373 INEOS Americas LLC (Minor, 38100)

Mark,

Sorry I missed your call. We must be having phone issues.  
I will be getting the forms signed on Monday. I will send you copies electronically and we will also mail them (with a tracking service) to the noted address.

Thanks,

**INEOS**  
**Oxide**

**Carlisa Navy**

Environmental Engineer

INEOS Oxide  
5761 Underwood Road  
Pasadena, TX 77507

t: 281-474-0727

e: [carlisa.navy@ineos.com](mailto:carlisa.navy@ineos.com)

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**From:** Mark McDonald <[Mark.McDonald@tceq.texas.gov](mailto:Mark.McDonald@tceq.texas.gov)>  
**Sent:** Friday, January 30, 2026 1:57 PM  
**To:** Navy, Carlisa <[carlisa.navy@ineos.com](mailto:carlisa.navy@ineos.com)>  
**Subject:** RE: TCEQ Working Draft Permit - O1373 INEOS Americas LLC (Minor, 38100)

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Carlisa,  
Sorry, I just missed your phone call, but tried to call back and could not get through. Please call back if you have time this afternoon and we can discuss in more detail.

The final OP-CRO1 with date range and wet signature would need to be mailed to our physical address, and best to keep a tracking number. A copy of the OP-CRO1 and the updated ACPS can be received by email, if the dates of the documents are included in the date range.

- When I receive email with pdf's, I can update the documents and system, but won't be able to release public notice letter, until we receive the physical OP-CRO1 with RO/DAR signature.
- Submit by mail a completed [OP-CRO1](#), using the date range and wet signature form to:

Texas Commission on Environmental Quality  
**Attn:** Mark McDonald / Operating Permits Section  
Air Permits Division **MC-163**  
12100 Park 35 Circle / Bldg. C,  
Austin, TX 78753.

***\*If mailing hard copy, use a tracking service and email me the tracking number.***

Let me know if you have any questions.

Regards,  
Mark

---

**From:** Navy, Carlisa <[carlisa.navy@ineos.com](mailto:carlisa.navy@ineos.com)>  
**Sent:** Friday, January 30, 2026 10:56 AM  
**To:** Mark McDonald <[Mark.McDonald@tceq.texas.gov](mailto:Mark.McDonald@tceq.texas.gov)>  
**Subject:** RE: TCEQ Working Draft Permit - O1373 INEOS Americas LLC (Minor, 38100)

Hello Mark,

I am having difficulties getting access to the existing application work area in STEERS. Would it be acceptable for me to send you the pdfs of the forms with any required signatures included?

Thanks,

**INEOS**  
**Oxide**

**Carlisa Navy**

Environmental Engineer

INEOS Oxide  
5761 Underwood Road  
Pasadena, TX 77507

t: 281-474-0727

e: [carlisa.navy@ineos.com](mailto:carlisa.navy@ineos.com)

---

**From:** Mark McDonald <[Mark.McDonald@tceq.texas.gov](mailto:Mark.McDonald@tceq.texas.gov)>  
**Sent:** Monday, January 26, 2026 5:12 PM  
**To:** Navy, Carlisa <[carlisa.navy@ineos.com](mailto:carlisa.navy@ineos.com)>  
**Subject:** RE: TCEQ Working Draft Permit - O1373 INEOS Americas LLC (Minor, 38100)  
**Importance:** High

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Carlisa:

I have received feedback from managements final WDP review, and an updated form OP-ACPS will be needed to adequately show compliance with rules [§122.146 Compliance Certification Terms and Conditions](#) and [40 CFR Part 70](#).

The following issues need to be addressed:

- Please submit an updated OP-ACPS form with updated compliance schedule question **7** for the three items. You may refer to the instructions form for more information.  
[https://www.tceq.texas.gov/permitting/air/forms/titlev/comp/tv\\_comp\\_forms.html](https://www.tceq.texas.gov/permitting/air/forms/titlev/comp/tv_comp_forms.html)
  - **Compliance Schedule Question 7** - Progress Report Submission Schedule: [40 CFR Part 70](#) requires that, beginning after the FOP is issued, progress reports on each non-compliance situation must be submitted no less frequently than every six months until the corrective actions are complete or compliance is achieved. The TCEQ reserves the right to require progress reports at more frequent intervals.
  - **Here is an example** of question 7 for a site that does not have a more stringent schedule. - *"Progress reports will be submitted semiannually as part of the semiannual deviation report until corrective actions are complete or compliance is achieved."*
- Submit a final OP-CRO1. A final certification for all the changes made after the initial application was received via email. There are three ways to certify, and we can discuss it at that time. Currently, my records show the specific dates or time-period. Currently, my records show the time-period began on 9-3-2025 to **1-XX-2026**.)

Please submit these two items via STEERS at your earliest opportunity, but no later than **COB February 2, 2026**. I can review these documents via email prior to submitting these two documents via STEERS, and if signed online by the RO. Contact me if you have any questions or if you wish to discuss any other details or deadlines regarding this project.

Regards,  
Mark

---

**From:** Mark McDonald  
**Sent:** Wednesday, January 14, 2026 3:19 PM  
**To:** 'Navy, Carlisa' <[carlisa.navy@ineos.com](mailto:carlisa.navy@ineos.com)>  
**Subject:** RE: TCEQ Working Draft Permit - O1373 INEOS Americas LLC (Minor, 38100)

Carlisa,

Just wanted to give you an update on this project. It is currently in QAQC review, and I am waiting to see if any additional information is needed before I request the final OP-CRO1, to certify all of the updates, and we can move to public notice.

I should be reaching out in the next few days. Let me know if you have any questions.

Regards,  
Mark



Mark McDonald  
Operating Permits Section  
Air Permits Division, Office of Air,  
Texas Commission on Environmental Quality (TCEQ)  
(512) 239-1357

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[mark.mcdonald@tceq.texas.gov](mailto:mark.mcdonald@tceq.texas.gov)

---

**From:** Navy, Carlisa <[carlisa.navy@ineos.com](mailto:carlisa.navy@ineos.com)>  
**Sent:** Friday, December 5, 2025 8:55 AM  
**To:** Mark McDonald <[Mark.McDonald@tceq.texas.gov](mailto:Mark.McDonald@tceq.texas.gov)>  
**Subject:** RE: TCEQ Working Draft Permit - O1373 INEOS Americas LLC (Minor, 38100)

Hello Mark,

Hope you had a great Thanksgiving 😊

Attached is the latest version of the ACPS. I met with our other environmental engineer and he provided some additional updates. The number of ACPS items is now 3.

Please let me know if you have any questions, suggestions, or concerns.

Thanks,

**INEOS**  
**Oxide**

**Carlisa Navy**  
Environmental Engineer

INEOS Oxide  
5761 Underwood Road  
Pasadena, TX 77507

t: 281-474-0727

e: [carlisa.navy@ineos.com](mailto:carlisa.navy@ineos.com)

---

**From:** Mark McDonald <[Mark.McDonald@tceq.texas.gov](mailto:Mark.McDonald@tceq.texas.gov)>

**Sent:** Thursday, November 20, 2025 3:19 PM

**To:** Navy, Carlisa <[carlisa.navy@ineos.com](mailto:carlisa.navy@ineos.com)>

**Subject:** RE: TCEQ Working Draft Permit - 01373 INEOS Americas LLC (Minor, 38100)

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Carlisa,  
Yes, 10 works for me.

Thank you,  
Mark

---

**From:** Navy, Carlisa <[carlisa.navy@ineos.com](mailto:carlisa.navy@ineos.com)>

**Sent:** Thursday, November 20, 2025 1:36 PM

**To:** Mark McDonald <[Mark.McDonald@tceq.texas.gov](mailto:Mark.McDonald@tceq.texas.gov)>

**Subject:** RE: TCEQ Working Draft Permit - 01373 INEOS Americas LLC (Minor, 38100)

Mark,

Is 10:00 am tomorrow morning (11/21) a good time for you?

**INEOS**  
**Oxide**

**Carlisa Navy**

Environmental Engineer

INEOS Oxide  
5761 Underwood Road  
Pasadena, TX 77507

t: 281-474-0727

e: [carlisa.navy@ineos.com](mailto:carlisa.navy@ineos.com)

---

**From:** Mark McDonald <[Mark.McDonald@tceq.texas.gov](mailto:Mark.McDonald@tceq.texas.gov)>

**Sent:** Thursday, November 20, 2025 11:21 AM

To: Navy, Carlisa <carlisa.navy@ineos.com>

Subject: RE: TCEQ Working Draft Permit - O1373 INEOS Americas LLC (Minor, 38100)

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Good morning Carlisa,

Thanks for the update and comment, I double checked the two citations. The table breaks at a bad spot, and they are at the very bottom of page 103. I will adjust the margins or choose to not let rows break in the table properties (this usually adds several pages to the permit).

Let me know if you have a few minutes to discuss the ACPS today or Friday. We should have a small window as I prepare this project for our QAQC and management review, before going to public notice. Do you think it could be possible to get a new clean version of the ACPS with updated compliance schedules to me by the first week in December?

Thanks,  
Mark

---

**From:** Navy, Carlisa <carlisa.navy@ineos.com>

**Sent:** Wednesday, November 19, 2025 7:28 PM

**To:** Mark McDonald <Mark.McDonald@tceq.texas.gov>

**Subject:** RE: TCEQ Working Draft Permit - O1373 INEOS Americas LLC (Minor, 38100)

Hello Mark,

I had one comment regarding the PAINTAREA citations: I noticed that the highlighted text below is missing in the permit.

<b>Date: 08/21/2025</b>	<b>Regulated Entity No.: RN102926920</b>	<b>Permit No.:</b>
<b>Company Name: INEOS AMERICAS LLC</b>	<b>Area Name: Bayport EO Plant</b>	

Revision No.	Unit/Group/Process ID No.	SOP/GOP Index No.	Pollutant	Monitoring and Testing Requirements	Recordkeep Requireme
2	PAINTAREA	115E-3	VOC	[R]§115.424(a) [R]§115.424(b) [GR]§115.425(1) [R]§115.425(6) [GR]§115.426(1)	[R]§115.426 [GR]§115.42

**Regarding the ACPS:**

Although we submitted the proposed completion targets to the TCEQ, we have received pushback on some of the dates. Discussions are still in progress.  
How should we proceed with the updates?

My apologies for not responding sooner, but I was hoping that the ACPS issue would be resolved by 11/19.

Let's please plan to discuss at your earliest convenience.

Thanks,

**INEOS**  
**Oxide**

**Carlisa Navy**

Environmental Engineer

INEOS Oxide  
5761 Underwood Road  
Pasadena, TX 77507

t: 281-474-0727

e: [carlisa.navy@ineos.com](mailto:carlisa.navy@ineos.com)

---

**From:** Mark McDonald <[Mark.McDonald@tceq.texas.gov](mailto:Mark.McDonald@tceq.texas.gov)>  
**Sent:** Friday, November 7, 2025 2:19 PM  
**To:** Navy, Carlisa <[carlisa.navy@ineos.com](mailto:carlisa.navy@ineos.com)>  
**Subject:** RE: TCEQ Working Draft Permit - 01373 INEOS Americas LLC (Minor, 38100)

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Ms. Navy:

I have completed the updates and converted project 38100 to a significant revision. Please review Working Draft Permit (WDP) **V2.0** for Federal Operating Permit (FOP) of Permit No. O1373 for INEOS Americas LLC.

Please review the WDP and submit any comments you have at your earliest opportunity, but no later than **November 19, 2025**.

In addition, the following issue may need further discussion or minor adjustments:

- Please review the submitted ACPS compliance schedule text, as some items needed to be condensed.
- NSR authorization dates, as some changes may not be incorporated into this Title V project.

Contact me if you have any questions or if you wish to discuss any other details or deadlines regarding your application or permit.

Regards,  
Mark

---

**From:** Navy, Carlisa <[carlisa.navy@ineos.com](mailto:carlisa.navy@ineos.com)>  
**Sent:** Thursday, November 6, 2025 3:33 PM  
**To:** Mark McDonald <[Mark.McDonald@tceq.texas.gov](mailto:Mark.McDonald@tceq.texas.gov)>  
**Subject:** RE: TCEQ Working Draft Permit - O1373 INEOS Americas LLC (Minor, 38100)

Hello Mark,

115E-2 is being removed.

Thanks,

**INEOS**  
**Oxide**

**Carlisa Navy**

Environmental Engineer

INEOS Oxide  
5761 Underwood Road  
Pasadena, TX 77507

t: 281-474-0727

e: [carlisa.navy@ineos.com](mailto:carlisa.navy@ineos.com)

---

**From:** Mark McDonald <[Mark.McDonald@tceq.texas.gov](mailto:Mark.McDonald@tceq.texas.gov)>  
**Sent:** Wednesday, November 5, 2025 5:01 PM  
**To:** Navy, Carlisa <[carlisa.navy@ineos.com](mailto:carlisa.navy@ineos.com)>  
**Subject:** RE: TCEQ Working Draft Permit - O1373 INEOS Americas LLC (Minor, 38100)

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Carlisa,

I'm working on finalizing a final working draft permit (WDP) for review and comments, which will possibly sent out this Friday.

It is not very clear on the PAINTAREA project application, but it appears that the index number "115E-2" is being requested to be removed in total. Is that correct? The application reflects a deletion on the OP-REQ3. Generally, by updating the forms with their new codes/attributes and utilizing "strikethroughs" for the codes or attributes that are changing/going away.

- If the PAINTAREA index number 115E-2 is being **removed**, please confirm in this email.
- If the PAINTAREA index number 115E-2 is being **changed**, I would need an updated OP-UA18.

Applicable Requirements Summary  
Form OP-REQ3 (Page 3)  
Federal Operating Permit Program  
Table 2a: Deletions

Date: 08/21/2025	Regulated Entity No.: RN102926920	Permit No.: O1373
Company Name: INEOS AMERICAS LLC		Area Name: Bayport EO Plant

Revision No.	Unit/Group/Process ID No.	Unit/Group/Process Applicable Form	SOP/GOP Index No.	Pollutant	Applicable Regulatory Requirement Name	Applicable Regulatory Requirement Standard(s)
3	PAINTAREA	OP-REQ3	115E-2	VOC	30 TAC Chapter 115, Subchapter E, Division 5	<del>§ 115.451(a)(1)</del> <del>§ 115.453(e)</del> <del>§ 115.453(e)(1)</del>

Let me know if you have any questions or wish to discuss.

Regards,  
Mark

---

**From:** Navy, Carlisa <[carlisa.navy@ineos.com](mailto:carlisa.navy@ineos.com)>  
**Sent:** Tuesday, October 7, 2025 10:24 AM  
**To:** Mark McDonald <[Mark.McDonald@tceq.texas.gov](mailto:Mark.McDonald@tceq.texas.gov)>  
**Subject:** RE: TCEQ Working Draft Permit - O1373 INEOS Americas LLC (Minor, 38100)

Hello Mark,

Attached are the updated OP-2 form and updated ACPS form.

Please let me know if you have any questions, suggestions, or concerns.

Thanks,

**INEOS**  
Oxide

**Carlisa Navy**  
Environmental Engineer

INEOS Oxide  
5761 Underwood Road

Pasadena, TX 77507

t: 281-474-0727

e: [carlisa.navy@ineos.com](mailto:carlisa.navy@ineos.com)

---

**From:** Mark McDonald <[Mark.McDonald@tceq.texas.gov](mailto:Mark.McDonald@tceq.texas.gov)>  
**Sent:** Thursday, September 25, 2025 4:15 PM  
**To:** Navy, Carlisa <[carlisa.navy@ineos.com](mailto:carlisa.navy@ineos.com)>  
**Subject:** RE: TCEQ Working Draft Permit - O1373 INEOS Americas LLC (Minor, 38100)

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Carlisa:

Good speaking with you this afternoon. Based on my discussion with management, we can change the project to “Significant Revision” to address submitting an updated ACPS and incorporate qualifying minor revisions within the project for the two other units.

Please submit an updated OP-2 form for TCEQ project 38100 with the following:

- OP-2 / Table 1, indicate Significant Revision for permit O1373 and I will update it to revise project 38100.
- OP-2 / Table 2, combine information from both submitted Streamline projects.
  - Minor “Revision Code” **MS-C** can remain for units **R-1** and **PAINTAREA**.
  - Update the “Revision Code” for the **ACPS** to **SIG-E**, as it will be the only significant item in this project.

Once I receive the updated OP-2, I will work internally to combine projects 37100 and 38919 (PAINTAREA) for permit O1373 and update to a Significant Revision. You may submit this form first, so I can move forward and follow up with the updated APCS. Submit these updates at your earliest opportunity, but no later than **October 7, 2025**.

Let me know if you have any questions or concerns.

Regards,  
Mark

---

**From:** Mark McDonald  
**Sent:** Wednesday, September 3, 2025 11:11 AM  
**To:** [carlisa.navy@ineos.com](mailto:carlisa.navy@ineos.com)  
**Subject:** TCEQ Working Draft Permit - O1373 INEOS Americas LLC (Minor, 38100)

Ms. Navy:

I have completed the Working Draft Permit (WDP) for your Federal Operating Permit (FOP) Revision issuance permit application of Permit No. O1373 for INEOS Americas LLC.

Please review the WDP and submit any comments you have at your earliest opportunity, but no later than **September 24, 2025**.

In addition, the following issues must be addressed:

- Please review the submitted ACPS for updates or edits. Since this is a Streamlined Revision (Minor), and without going to the full public notice, only completed activities or milestones can be removed *“Compliance schedules or individual activities/milestones listed in the compliance schedule can be deleted based on submittal of form OP-ACPS. Compliance schedules cannot, otherwise, be revised. Revisions of compliance schedules are subject to public notice.”*
- Review NSR authorization dates for permits 6257E and 6257F. Just a note to be aware that, I see these permits have been revised recently, however I understand this may not have affected this Title V permit revision project.
- It appears that another minor revision project has been received and is still under “Administrative Review,” for this same permit to revise emission unit PAINTAREA to update Ch 115 and the APCS. Please let me know if you would like to combine these projects.
- Review Permit Term number 25 regarding, as I discovered an error in the Effective permit, which is corrected on this WDP to the original OP-PBRSUP submitted in the Renewal project. If no PBR’s were updated a new PBRSUP is not required.

Contact me if you have any questions or if you wish to discuss any other details or deadlines regarding your application or permit.

Regards,  
Mark

Review the second portion of the “SOP Technical Review Fact Sheet” located at [TCEQ - Site Operating Permit \(SOP\) Technical Review Fact Sheet](#) This guidance contains important information regarding WDP review and comment procedures.

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



Mark McDonald  
Operating Permits Section  
Air Permits Division, Office of Air,  
Texas Commission on Environmental Quality (TCEQ)  
(512) 239-1357

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[mark.mcdonald@tceq.texas.gov](mailto:mark.mcdonald@tceq.texas.gov)

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

All initial issuance, revision, renewal, and reopening permit application submittals requiring certification must be addressed using this form. Updates to site operating permit (SOP) and temporary operating permit (TOP) applications, other than public notice verification materials, must be certified prior to authorization of public notice or start of public announcement. Updates to general operating permit (GOP) applications must be certified prior to receiving an authorization to operate under a GOP.

<b>I. Identifying Information</b>	
RN: 102926920	
CN: 602805236	
Account No.: HG-1996-R	
Permit No.: O1373	
Project No.: N/A	
Area Name: Bayport EO Plant	
Company Name: INEOS Americas LLC	
<b>II. Certification Type</b> <i>(Please mark appropriate box)</i>	
<input checked="" type="checkbox"/> Responsible Official	<input type="checkbox"/> Duly Authorized Representative
<b>III. Submittal Type</b> <i>(Please mark appropriate box) (Only one response can be accepted per form)</i>	
<input type="checkbox"/> SOP/TOP Initial Permit Application	<input type="checkbox"/> Permit Revision, Renewal, or Reopening
<input type="checkbox"/> GOP Initial Permit Application	<input checked="" type="checkbox"/> Update to Permit Application
<input type="checkbox"/> Other: _____	

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

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

<b>IV. Certification of Truth</b>	
<b>This certification does not extend to information which is designated by TCEQ as information for reference only.</b>	
I, <u>Kevin McGovern</u>	certify that I am the <u>RO</u>
<i>(Certifier Name printed or typed)</i>	<i>(RO or DAR)</i>
and that, based on information and belief formed after reasonable inquiry, the statements and information dated during the time period or on the specific date(s) below, are true, accurate, and complete: <i>Note: Enter Either a Time Period or Specific Date(s) for each certification. This section must be completed. The certification is not valid without documentation date(s).</i>	
Time Period: From <u>September 3, 2025</u>	to <u>February 2, 2026</u>
<i>(Start Date)</i>	<i>(End Date)</i>
Specific Dates: _____	
<i>(Date 1)</i>	<i>(Date 2)</i>
<i>(Date 3)</i>	<i>(Date 4)</i>
<i>(Date 5)</i>	<i>(Date 6)</i>
Signature: <u><i>Kevin McGovern</i></u>	Signature Date: <u><i>2/2/26</i></u>
Title: <u>General Manager</u>	

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

<b>Date:</b> February 2, 2026	<b>Regulated Entity No.:</b> RN102926920	<b>Permit No.:</b> O1373
<b>Company Name:</b> INEOS Americas LLC		<b>Area Name:</b> Bayport EO Plant

- 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* (Indicate response by entering an "X" in the appropriate column)</b>	
1. 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
2. Are there any non-compliance situations addressed in the Compliance Schedule Section of this form (Part 2)?	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO
3. 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>	<b>3</b>
<p>* <i>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.</i></p> <p><i>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.</i></p>	

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

<b>Date:</b> February 2, 2026	<b>Regulated Entity No.:</b> RN102926920	<b>Permit No.:</b> O1373
<b>Company Name:</b> INEOS Americas LLC		<b>Area Name:</b> Bayport EO Plant

**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): <i>WASTEWATER</i>		
SOP Index No.: <i>N/A</i>		
Pollutant: <i>VOC &amp; HAP</i>		
<b>Applicable Requirement</b>		
<b>Citation</b>	<b>Text Description</b>	
<i>NSR Permit 6257E Special Condition 1 30 TAC §116.115(c)</i>	<i>SCI: Permit holder must comply with all special conditions contained in the NSR Permit including the emission rates listed in the MAERT.  (c) Special conditions. The holders of permits, special permits, standard permits, and special exemptions shall comply with all special conditions contained in the permit document.</i>	
<b>2. Compliance Status Assessment Method and Records Location</b>		
<b>Citation</b>	<b>Text Description</b>	<b>Location of Records/Documentation</b>
<i>NSR Permit 6257E Special Condition 1</i>	<i>Emission increases have not been evaluated via NSR Permit, PBR, Standard Permit and Title V Permit process.</i>	<i>On-site</i>
<b>3. Non-compliance Situation Description</b>		
<i>Process wastewater streams routed to the wastewater system result in emissions higher than authorized in Permit No. 6257E. The characteristics of certain wastewater streams result in changed rule applicability of the HON and Chapter 115 industrial wastewater rules, including the need for controls on affected wastewater system components.</i>		
<b>4. Corrective Action Plan Description</b>		
<i>The site quantified process wastewater streams and applied for a permit amendment to authorize increased emissions for the wastewater system. Controls to reduce emissions will be installed as required by the NSR permit process.</i>		
<b>5. List of Activities/Milestones to Implement the Corrective Action Plan</b>		
<i>Submitted an amendment application for NSR Permit 6257E on 06/30/2022.</i>		
<i>NSR 6257E Permit Amendment was issued on 6/14/2023 (TCEQ Project Number 343829).</i>		
<i>Installation of controls at EO railcar loading were completed on 12/20/2025 which satisfies the target of 12/31/25 per approved extension request.</i>		

**Part 2**

**A. Compliance Schedule**

*Install controls authorized via NSR Permit 6257E amendment. The controls are expected to be completed by May 30, 2026 for the RTO per extension request.*

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

<b>Date:</b> February 2, 2026	<b>Regulated Entity No.:</b> RN102926920	<b>Permit No.:</b> O1373
<b>Company Name:</b> INEOS Americas LLC		<b>Area Name:</b> Bayport EO Plant

**Part 2 (continued)**

*Submit a Title V revision application to update 40 CFR Part 63, Subpart G and 30 TAC Chapter 115, Industrial Wastewater applicability, if necessary, no later than six months after installation of the controls authorized by NSR Permit 6257E amendment (TCEQ Project Number 343829.)*

<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>	
<i>Progress reports will be submitted no less frequently than every six months until the corrective actions are complete or compliance is achieved.</i>	

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

<b>Date:</b> February 2, 2026	<b>Regulated Entity No.:</b> RN102926920	<b>Permit No.:</b> O1373
<b>Company Name:</b> INEOS Americas LLC		<b>Area Name:</b> Bayport EO Plant

**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): <i>WASTEWATER</i>		
SOP Index No.: <i>N/A</i>		
Pollutant: <i>VOC &amp; HAP</i>		
<b>Applicable Requirement</b>		
<b>Citation</b>	<b>Text Description</b>	
<i>40 CFR Subpart A §63.9 40 CFR Subpart G § 63.132, § 63.136; §§ 63.138-149; § 63.152 30 TAC § § 115.142-149</i>	<i>63.132 (a) Existing sources. This paragraph specifies the requirements applicable to process wastewater streams located at existing sources. The owner or operator shall comply with the requirements in paragraphs (a)(1) through (a)(3) of this section, no later than the applicable dates specified in § 63.100 of subpart F of this part.</i>	
<b>2. Compliance Status Assessment Method and Records Location</b>		
<b>Citation</b>	<b>Text Description</b>	<b>Location of Records/Documentation</b>
<i>40 CFR Subpart G § 63.132, § 63.136; § 63.138-149; § 63.152 30 TAC §§ 115.142-149</i>	<i>Site is not showing compliance with applicable HON and Chapter 115 requirements at this location.</i>	<i>On-site</i>
<b>3. Non-compliance Situation Description</b>		
<i>The "Force Main," which is part of the wastewater system Group 1 wastewater control system, has been incorrectly classified as a junction box. In addition, the Force Main no longer operates with only slight fluctuations to the liquid flow. Further, Equistar cannot demonstrate that the water seal at the exit of the Force Main is being maintained to restrict ventilation in the individual drain system and between components in the individual drain system.</i>		
<b>4. Corrective Action Plan Description</b>		
<i>The site will take measures to bring the Force Main into compliance with applicable HON and Chapter 115 requirements, as part of the controls to reduce emissions from the Bayport wastewater system.</i>		
<b>5. List of Activities/Milestones to Implement the Corrective Action Plan</b>		
<i>The site will take measures to bring the Force Main into compliance with applicable HON and Chapter 115 requirements as part of the project to reduce emissions from the wastewater system by December 31, 2025 for the EOD condensate projects per an extension request.</i>		

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

<b>Date:</b> February 2, 2026	<b>Regulated Entity No.:</b> RN102926920	<b>Permit No.:</b> O1373
<b>Company Name:</b> INEOS Americas LLC		<b>Area Name:</b> Bayport EO Plant

**Part 2 (continued)**

<b>6. — Previously Submitted Compliance Plan(s)</b>	
<b>Type of Action</b>	<b>Date Submitted</b>
<i>N/A</i>	
<b>7. — Progress Report Submission Schedule</b>	
<i>The periodic progress report with updates communicated to TCEQ on the DOV status, will constitute meeting this requirement.</i>	

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

<b>Date:</b> February 2, 2026	<b>Regulated Entity No.:</b> RN102926920	<b>Permit No.:</b> O1373
<b>Company Name:</b> INEOS Americas LLC		<b>Area Name:</b> Bayport EO Plant

**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): <i>WASTEWATER</i>		
SOP Index No.: <i>N/A</i>		
Pollutant: <i>VOC &amp; HAP</i>		
<b>Applicable Requirement</b>		
<b>Citation</b>	<b>Text Description</b>	
<i>NSR Permit 83663 Special Condition 1 NSR Permit 6257E Special Condition 1 30 TAC § 116.115(c)</i>	<i>SC1: Permit holder must comply with all special conditions contained in the NSR Permit including the emission rates listed in the MAERT. (c) Special conditions. The holders of permits, special permits, standard permits, and special exemptions shall comply with all special conditions contained in the permit document.</i>	
<b>2. Compliance Status Assessment Method and Records Location</b>		
<b>Citation</b>	<b>Text Description</b>	<b>Location of Records/Documentation</b>
<i>NSR Permit 83663 Special Condition 1 NSR Permit 6257E Special Condition 1</i>	<i>Emissions have not been evaluated via NSR Permit, PBR, Standard Permit and Title V Permit process.</i>	<i>On-site</i>
<b>3. Non-compliance Situation Description</b>		
<i>Emissions associated with maintenance, startup, and shutdown (MSS) and campaign change activities are not properly authorized in the existing authorization for emissions from the wastewater system in either Permit No.83663 or 6257E. Additional MSS and campaign change activity contributions to wastewater streams result in changed rule applicability of the HON and Chapter 115 industrial wastewater rules, including the need for control requirements on affected wastewater system components.</i>		
<b>4. Corrective Action Plan Description</b>		
<i>The site quantified MSS and campaign change activities and applied for a permit amendment to authorize increased emissions for the wastewater system. Controls to reduce emissions will be installed as required by the NSR permit process.</i>		
<b>5. List of Activities/Milestones to Implement the Corrective Action Plan</b>		
<i>Submitted an amendment application for NSR Permit 6257E on 06/30/2022.</i>		
<i>NSR 6257E Permit Amendment was issued on 6/14/2023 (TCEQ Project Number 343829).</i>		

**Part 2**

**A. Compliance Schedule**

*Installation of controls at EO railcar loading were completed on 12/20/2025 which satisfies the target of 12/31/25 per approved extension request.*

*Install controls authorized via NSR Permit 6257E amendment. The controls are expected to be completed by May 30, 2026 for the RTO per extension request.*

*Submit a Title V revision application to update 40 CFR Part 63, Subpart G and 30 TAC Chapter 115, Industrial Wastewater applicability, if necessary, no later than six months after installation of the controls authorized by NSR Permit 6257E amendment (TCEQ Project Number 343829).*

**6. Previously Submitted Compliance Plan(s)**

Type of Action	Date Submitted
N/A	

**7. Progress Report Submission Schedule**

*Progress reports will be submitted no less frequently than every six months until the corrective actions are complete or compliance is achieved.*

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

<b>Date:</b> February 2, 2026	<b>Regulated Entity No.:</b> RN102926920	<b>Permit No.:</b> O1373
<b>Company Name:</b> INEOS Americas LLC		<b>Area Name:</b> Bayport EO Plant

**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): <i>WASTEWATER</i>		
SOP Index No.: <i>N/A</i>		
Pollutant: <i>VOC &amp; HAP</i>		
<b>Applicable Requirement</b>		
<b>Citation</b>	<b>Text Description</b>	
<i>NSR Permit 6257E Special Condition 1 30 TAC 116.115(e)</i>	<i>SCI: Permit holder must comply with all special conditions contained in the NSR Permit including the emission rates listed in the MAERT. (e) Special conditions. The holders of permits, special permits, standard permits, and special exemptions shall comply with all special conditions contained in the permit document.</i>	
<b>2. Compliance Status Assessment Method and Records Location</b>		
<b>Citation</b>	<b>Text Description</b>	<b>Location of Records/Documentation</b>
<i>NSR Permit 6257E Special Condition 1</i>	<i>Emission have not been evaluated via NSR Permit, PBR, Standard Permit and Title V Permit process.</i>	<i>On-site</i>
<b>3. Non-compliance Situation Description</b>		
<i>A vent from the EOD condensate system that is routed to the wastewater sump contains ethylene oxide (EO) and other VOC emissions that exceed the current permit representations for EPN: UAD/PWW.</i>		
<b>4. Corrective Action Plan Description</b>		
<i>The site applied for a permit amendment to authorize increased emissions for the wastewater system. Controls to reduce emissions will be installed as required by the NSR permit process and applicable provisions of a compliance agreement dated 10/28/2021 and signed on 11/5/2021, as part of Investigation No. 1552706.</i>		
<b>5. List of Activities/Milestones to Implement the Corrective Action Plan</b>		
<i>Submitted an amendment application for NSR Permit 6257E on 06/30/2022.</i>		
<i>NSR 6257E Permit Amendment was issued on 6/14/2023 (TCEQ Project Number 343829).</i>		
<i>Install controls by authorized via NSR Permit 6257E amendment. The controls are expected to be completed by December 31,</i>		

**Part 2**

**A. Compliance Schedule**

*2025 for the EOD condensate project per an extension request.*

*Submit a Title V revision application to update 40 CFR Part 63, Subpart G and 30 TAC Chapter 115, Industrial Wastewater applicability, if necessary, no later than six months after installation of the controls authorized by NSR Permit 6257E amendment (TCEQ Project Number 343829).*

**6. Previously Submitted Compliance Plan(s)**

Type of Action	Date Submitted
N/A	

**7. Progress Report Submission Schedule**

*The periodic progress report with updates communicated to TCEQ on the DOV status, will constitute meeting this requirement.*

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

<b>Date:</b> February 2, 2026	<b>Regulated Entity No.:</b> RN102926920	<b>Permit No.:</b> O1373
<b>Company Name:</b> INEOS Americas LLC		<b>Area Name:</b> Bayport EO Plant

**Part 2**

**A. Compliance Schedule**

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. *(See form instruction for details.)* If there are no non-compliance situations ongoing at time of application, then this section is not required to be completed.

**1. Specific Non-Compliance Situation**

Unit/Group/Process ID No.(s): *P-3, P-4, P-5, P-6, P-10, P-102*

SOP Index No.: *N/A*

Pollutant: *VOC, HAP*

**Applicable Requirement**

Citation	Text Description
<i>Federal Operating Permit O1373 Special Condition 1</i>	<i>SCI: A. Emission units (including groups and processes) in the Applicable Requirements Summary attachment shall meet the limitations, standards, equipment specifications, monitoring, recordkeeping, reporting, testing, and other requirements listed in the Applicable Requirements Summary attachment to assure compliance with the permit.</i>

**2. Compliance Status Assessment Method and Records Location**

Citation	Text Description	Location of Records/Documentation
<i>Federal Operating Permit O1373 Special Condition 1</i>	<i>Site lacks sufficient documentation to verify that all regulatory applicability and associated requirements are included in Title V permit O1373 for the noted process vents.</i>	<i>On-site</i>

**3. Non-compliance Situation Description**

*Site lacks sufficient documentation to verify that all regulatory applicability and associated requirements are included in Title V permit O1373 for the following process vents: P-3 (CO2 Stripper), P-4 (Ethylene Oxide Vent Absorber), P-5 (Ethylene Glycol Dehydration System Vacuum Vent Condenser), P-6 (Monoethylene Glycol Column Vacuum Vent Condenser), P-10 (Glycol Recovery Vacuum Vent Condenser), P-102 (Ethanolamine Refinery Vacuum System After Condenser).*

**4. Corrective Action Plan Description**

*The site will conduct compliance testing to evaluate regulatory applicability. Title V permit and NSR permit amendments will be submitted as needed for any regulatory and emission representation updates.*

**5. List of Activities/Milestones to Implement the Corrective Action Plan**

TCEQ - 10100 (APDG 5876v4, Revised 07/17) OP-ACPS

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

Part 2

**A. Compliance Schedule**

*Complete compliance testing of process vents P-3, P-4, and P-102 prior to the 2024 site turnaround in order to assess regulatory applicability by 1/27/2024. The compliance testing of process vents P-3, P-4, and P-102 has been completed.*

*Complete compliance testing of process vents P-5, P-6, and P-10 after the 2024 plantwide turnaround in order to complete testing at sufficient emission rate conditions. Compliance testing to be completed by 8/30/2024. The compliance testing of process vents P-5, P-6, and P-10 has been completed. The test results indicated that P-6 process vent emissions exceeded the current NSR permit allowable. Resolution of the emissions exceedance will include the completion, submittal, and approval of a permit amendment as well as the construction of the project to route the P-6 process vent to the RTOs for control. Install controls authorized via NSR Permit 6257E amendment. The control of P-6 is expected to be completed by July 15, 2026.*

*As needed, submit Title V permit amendment with resolved regulatory applicability and NSR Permit amendment application for any needed emission representation updates by 10/15/2024.*

**6. Previously Submitted Compliance Plan(s)**

Type of Action	Date Submitted
N/A	

**7. Progress Report Submission Schedule**

*Progress reports will be submitted no less frequently than every six months until the corrective actions are complete or compliance is achieved.*

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

<b>Date:</b> December 5, 2025	<b>Regulated Entity No.:</b> RN102926920	<b>Permit No.:</b> O1373
<b>Company Name:</b> INEOS Americas LLC		<b>Area Name:</b> Bayport EO Plant

- 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* (Indicate response by entering an “X” in the appropriate column)</b>	
1. 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
2. Are there any non-compliance situations addressed in the Compliance Schedule Section of this form (Part 2)?	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO
3. 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>	<b>3</b>
<p>* <i>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.</i></p> <p><i>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.</i></p>	

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

<b>Date:</b> December 5, 2025	<b>Regulated Entity No.:</b> RN102926920	<b>Permit No.:</b> O1373
<b>Company Name:</b> INEOS Americas LLC		<b>Area Name:</b> Bayport EO Plant

**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): <b>WASTEWATER</b>		
SOP Index No.: <i>N/A</i>		
Pollutant: <b>VOC &amp; HAP</b>		
<b>Applicable Requirement</b>		
<b>Citation</b>	<b>Text Description</b>	
<i>NSR Permit 6257E Special Condition 1 30 TAC §116.115(c)</i>	<i>SC1: Permit holder must comply with all special conditions contained in the NSR Permit including the emission rates listed in the MAERT. (c) Special conditions. The holders of permits, special permits, standard permits, and special exemptions shall comply with all special conditions contained in the permit document.</i>	
<b>2. Compliance Status Assessment Method and Records Location</b>		
<b>Citation</b>	<b>Text Description</b>	<b>Location of Records/Documentation</b>
<i>NSR Permit 6257E Special Condition 1</i>	<i>Emission increases have not been evaluated via NSR Permit, PBR, Standard Permit and Title V Permit process.</i>	<i>On-site</i>
<b>3. Non-compliance Situation Description</b>		
<i>Process wastewater streams routed to the wastewater system result in emissions higher than authorized in Permit No. 6257E. The characteristics of certain wastewater streams result in changed rule applicability of the HON and Chapter 115 industrial wastewater rules, including the need for controls on affected wastewater system components.</i>		
<b>4. Corrective Action Plan Description</b>		
<i>The site quantified process wastewater streams and applied for a permit amendment to authorize increased emissions for the wastewater system. Controls to reduce emissions will be installed as required by the NSR permit process.</i>		
<b>5. List of Activities/Milestones to Implement the Corrective Action Plan</b>		
<i>Submitted an amendment application for NSR Permit 6257E on 06/30/2022.</i>		
<i>NSR 6257E Permit Amendment was issued on 6/14/2023 (TCEQ Project Number 343829).</i>		
<i>Install controls authorized via NSR Permit 6257E amendment. The controls are expected to be completed by May 30, 2026 for the RTO and December 31, 2025 for the EO railcar loading per extension request.</i>		

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

<b>Date:</b> December 5, 2025	<b>Regulated Entity No.:</b> RN102926920	<b>Permit No.:</b> O1373
<b>Company Name:</b> INEOS Americas LLC		<b>Area Name:</b> Bayport EO Plant

**Part 2 (continued)**

*Submit a Title V revision application to update 40 CFR Part 63, Subpart G and 30 TAC Chapter 115, Industrial Wastewater applicability, if necessary, no later than six months after installation of the controls authorized by NSR Permit 6257E amendment (TCEQ Project Number 343829.)*

<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>	
<i>The periodic progress report with updates communicated to TCEQ on the DOV status, will constitute meeting this requirement.</i>	

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

<b>Date:</b> December 5, 2025	<b>Regulated Entity No.:</b> RN102926920	<b>Permit No.:</b> O1373
<b>Company Name:</b> INEOS Americas LLC		<b>Area Name:</b> Bayport EO Plant

**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): <del>WASTEWATER</del>		
SOP Index No.: <del>N/A</del>		
Pollutant: <del>VOC &amp; HAP</del>		
<b>Applicable Requirement</b>		
<b>Citation</b>	<b>Text Description</b>	
<del>40 CFR Subpart A §63.9 40 CFR Subpart G § 63.132, § 63.136; §§ 63.138-149; § 63.152 30 TAC §§ 115.142-149</del>	<del>63.132 (a) Existing sources. This paragraph specifies the requirements applicable to process wastewater streams located at existing sources. The owner or operator shall comply with the requirements in paragraphs (a)(1) through (a)(3) of this section, no later than the applicable dates specified in § 63.100 of subpart F of this part.</del>	
<b>2. Compliance Status Assessment Method and Records Location</b>		
<b>Citation</b>	<b>Text Description</b>	<b>Location of Records/Documentation</b>
<del>40 CFR Subpart G § 63.132, § 63.136; § 63.138-149; § 63.152 30 TAC §§ 115.142-149</del>	<del>Site is not showing compliance with applicable HON and Chapter 115 requirements at this location.</del>	<del>On-site</del>
<b>3. Non-compliance Situation Description</b>		
<del>The "Force Main," which is part of the wastewater system Group 1 wastewater control system, has been incorrectly classified as a junction box. In addition, the Force Main no longer operates with only slight fluctuations to the liquid flow. Further, Equistar cannot demonstrate that the water seal at the exit of the Force Main is being maintained to restrict ventilation in the individual drain system and between components in the individual drain system.</del>		
<b>4. Corrective Action Plan Description</b>		
<del>The site will take measures to bring the Force Main into compliance with applicable HON and Chapter 115 requirements, as part of the controls to reduce emissions from the Bayport wastewater system.</del>		
<b>5. List of Activities/Milestones to Implement the Corrective Action Plan</b>		
<del>The site will take measures to bring the Force Main into compliance with applicable HON and Chapter 115 requirements as part of the project to reduce emissions from the wastewater system by December 31, 2025 for the EOD condensate projects per an extension request.</del>		

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

<b>Date:</b> December 5, 2025	<b>Regulated Entity No.:</b> RN102926920	<b>Permit No.:</b> O1373
<b>Company Name:</b> INEOS Americas LLC		<b>Area Name:</b> Bayport EO Plant

**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>	
<i>The periodic progress report with updates communicated to TCEQ on the DOV status, will constitute meeting this requirement.</i>	

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

<b>Date:</b> December 5, 2025	<b>Regulated Entity No.:</b> RN102926920	<b>Permit No.:</b> O1373
<b>Company Name:</b> INEOS Americas LLC		<b>Area Name:</b> Bayport EO Plant

**Part 2**

<b>A. Compliance Schedule</b>		
<p>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.</p>		
<b>1. Specific Non-Compliance Situation</b>		
Unit/Group/Process ID No.(s): <i>WASTEWATER</i>		
SOP Index No.: <i>N/A</i>		
Pollutant: <i>VOC &amp; HAP</i>		
<b>Applicable Requirement</b>		
<b>Citation</b>	<b>Text Description</b>	
<i>NSR Permit 83663 Special Condition 1 NSR Permit 6257E Special Condition 1 30 TAC § 116.115(c)</i>	<i>SC1: Permit holder must comply with all special conditions contained in the NSR Permit including the emission rates listed in the MAERT.  (c) Special conditions. The holders of permits, special permits, standard permits, and special exemptions shall comply with all special conditions contained in the permit document.</i>	
<b>2. Compliance Status Assessment Method and Records Location</b>		
<b>Citation</b>	<b>Text Description</b>	<b>Location of Records/Documentation</b>
<i>NSR Permit 83663 Special Condition 1 NSR Permit 6257E Special Condition 1</i>	<i>Emissions have not been evaluated via NSR Permit, PBR, Standard Permit and Title V Permit process.</i>	<i>On-site</i>
<b>3. Non-compliance Situation Description</b>		
<i>Emissions associated with maintenance, startup, and shutdown (MSS) and campaign change activities are not properly authorized in the existing authorization for emissions from the wastewater system in either Permit No.83663 or 6257E. Additional MSS and campaign change activity contributions to wastewater streams result in changed rule applicability of the HON and Chapter 115 industrial wastewater rules, including the need for control requirements on affected wastewater system components.</i>		
<b>4. Corrective Action Plan Description</b>		
<i>The site quantified MSS and campaign change activities and applied for a permit amendment to authorize increased emissions for the wastewater system. Controls to reduce emissions will be installed as required by the NSR permit process.</i>		
<b>5. List of Activities/Milestones to Implement the Corrective Action Plan</b>		
<i>Submitted an amendment application for NSR Permit 6257E on 06/30/2022.</i>		
<i>NSR 6257E Permit Amendment was issued on 6/14/2023 (TCEQ Project Number 343829).</i>		

**Part 2**

**A. Compliance Schedule**

***Install controls authorized via NSR Permit 6257E amendment. The controls are expected to be completed by May 30, 2026 for the RTO and by December 31, 2025 for the EO railcar loading per an extension request.***

***Submit a Title V revision application to update 40 CFR Part 63, Subpart G and 30 TAC Chapter 115, Industrial Wastewater applicability, if necessary, no later than six months after installation of the controls authorized by NSR Permit 6257E amendment (TCEQ Project Number 343829).***

**6. Previously Submitted Compliance Plan(s)**

Type of Action	Date Submitted
N/A	

**7. Progress Report Submission Schedule**

***The periodic progress report with updates communicated to TCEQ on the DOV status, will constitute meeting this requirement.***

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

<b>Date:</b> December 5, 2025	<b>Regulated Entity No.:</b> RN102926920	<b>Permit No.:</b> O1373
<b>Company Name:</b> INEOS Americas LLC		<b>Area Name:</b> Bayport EO Plant

**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): <del>WASTEWATER</del>		
SOP Index No.: <del>N/A</del>		
Pollutant: <del>VOC &amp; HAP</del>		
<b>Applicable Requirement</b>		
<b>Citation</b>	<b>Text Description</b>	
<del>NSR Permit 6257E Special Condition 1 30 TAC 116.115(e)</del>	<del>SCI: Permit holder must comply with all special conditions contained in the NSR Permit including the emission rates listed in the MAERT. (e) Special conditions. The holders of permits, special permits, standard permits, and special exemptions shall comply with all special conditions contained in the permit document.</del>	
<b>2. Compliance Status Assessment Method and Records Location</b>		
<b>Citation</b>	<b>Text Description</b>	<b>Location of Records/Documentation</b>
<del>NSR Permit 6257E Special Condition 1</del>	<del>Emission have not been evaluated via NSR Permit, PBR, Standard Permit and Title V Permit process.</del>	<del>On-site</del>
<b>3. Non-compliance Situation Description</b>		
<del>A vent from the EOD condensate system that is routed to the wastewater sump contains ethylene oxide (EO) and other VOC emissions that exceed the current permit representations for EPN: UAD/PWW.</del>		
<b>4. Corrective Action Plan Description</b>		
<del>The site applied for a permit amendment to authorize increased emissions for the wastewater system. Controls to reduce emissions will be installed as required by the NSR permit process and applicable provisions of a compliance agreement dated 10/28/2021 and signed on 11/5/2021, as part of Investigation No. 1552706.</del>		
<b>5. List of Activities/Milestones to Implement the Corrective Action Plan</b>		
<del>Submitted an amendment application for NSR Permit 6257E on 06/30/2022.</del>		
<del>NSR 6257E Permit Amendment was issued on 6/14/2023 (TCEQ Project Number 343829).</del>		
<del>Install controls by authorized via NSR Permit 6257E amendment. The controls are expected to be completed by December 31,</del>		

**Part 2**

**A. Compliance Schedule**

~~2025 for the EOD condensate project per an extension request.~~

~~Submit a Title V revision application to update 40 CFR Part 63, Subpart G and 30 TAC Chapter 115, Industrial Wastewater applicability, if necessary, no later than six months after installation of the controls authorized by NSR Permit 6257E amendment (TCEQ Project Number 343829).~~

**6. Previously Submitted Compliance Plan(s)**

Type of Action	Date Submitted
N/A	

**7. Progress Report Submission Schedule**

~~The periodic progress report with updates communicated to TCEQ on the DOV status, will constitute meeting this requirement.~~

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

<b>Date:</b> December 5, 2025	<b>Regulated Entity No.:</b> RN102926920	<b>Permit No.:</b> O1373
<b>Company Name:</b> INEOS Americas LLC		<b>Area Name:</b> Bayport EO Plant

**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): <i>P-3, P-4, P-5, P-6, P-10, P-102</i>		
SOP Index No.: <i>N/A</i>		
Pollutant: <i>VOC, HAP</i>		
<b>Applicable Requirement</b>		
<b>Citation</b>	<b>Text Description</b>	
<i>Federal Operating Permit O1373 Special Condition 1</i>	<i>SCI: A. Emission units (including groups and processes) in the Applicable Requirements Summary attachment shall meet the limitations, standards, equipment specifications, monitoring, recordkeeping, reporting, testing, and other requirements listed in the Applicable Requirements Summary attachment to assure compliance with the permit.</i>	
<b>2. Compliance Status Assessment Method and Records Location</b>		
<b>Citation</b>	<b>Text Description</b>	<b>Location of Records/Documentation</b>
<i>Federal Operating Permit O1373 Special Condition 1</i>	<i>Site lacks sufficient documentation to verify that all regulatory applicability and associated requirements are included in Title V permit O1373 for the noted process vents.</i>	<i>On-site</i>
<b>3. Non-compliance Situation Description</b>		
<i>Site lacks sufficient documentation to verify that all regulatory applicability and associated requirements are included in Title V permit O1373 for the following process vents: P-3 (CO2 Stripper), P-4 (Ethylene Oxide Vent Absorber), P-5 (Ethylene Glycol Dehydration System Vacuum Vent Condenser), P-6 (Monoethylene Glycol Column Vacuum Vent Condenser), P-10 (Glycol Recovery Vacuum Vent Condenser), P-102 (Ethanolamine Refinery Vacuum System After Condenser).</i>		
<b>4. Corrective Action Plan Description</b>		
<i>The site will conduct compliance testing to evaluate regulatory applicability. Title V permit and NSR permit amendments will be submitted as needed for any regulatory and emission representation updates.</i>		
<b>5. List of Activities/Milestones to Implement the Corrective Action Plan</b>		

Part 2

**A. Compliance Schedule**

~~Complete compliance testing of process vents P-3, P-4, and P-102 prior to the 2024 site turnaround in order to assess regulatory applicability by 1/27/2024. The compliance testing of process vents P-3, P-4, and P-102 has been completed.~~

~~Complete compliance testing of process vents P-5, P-6, and P-10 after the 2024 plantwide turnaround in order to complete testing at sufficient emission rate conditions. Compliance testing to be completed by 8/30/2024. The compliance testing of process vents P-5, P-6, and P-10 has been completed. The test results indicated that P-6 process vent emissions exceeded the current NSR permit allowable. Resolution of the emissions exceedance will include the completion, submittal, and approval of a permit amendment as well as the construction of the project to route the P-6 process vent to the RTOs for control. Install controls authorized via NSR Permit 6257E amendment. The control of P-6 is expected to be completed by July 15, 2026.~~

~~As needed, submit Title V permit amendment with resolved regulatory applicability and NSR Permit amendment application for any needed emission representation updates by 10/15/2024.~~

**6. Previously Submitted Compliance Plan(s)**

Type of Action	Date Submitted
N/A	

**7. Progress Report Submission Schedule**

*The periodic progress report with updates communicated to TCEQ on the DOV status, will constitute meeting this requirement.*

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

Date: 10/07/2025	
Permit No.: O1373	
Regulated Entity No.: RN102926920	
Company Name: INEOS Americas LLC	
For Submissions to EPA	
Has an electronic copy of this application been submitted (or is being submitted) to EPA? <span style="float: right;"><input checked="" type="checkbox"/> YES <input type="checkbox"/> NO</span>	
<b>I. Application Type</b>	
Indicate the type of application:	
<input type="checkbox"/> Renewal	
<input type="checkbox"/> Streamlined Revision (Must include provisional terms and conditions as explained in the instructions.)	
<input checked="" 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**

<b>III. Major Source Pollutants (Complete this section if the permit revision is due to a change at the site or change in regulations.)</b>						
Indicate all pollutants for which the site is a major source based on the site's potential to emit: <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 type="checkbox"/> PM <sub>10</sub>	<input type="checkbox"/> CO	<input type="checkbox"/> Pb	<input checked="" type="checkbox"/> HAP
Other:						
<b>IV. Reference Only Requirements (For reference only)</b>						
Has the applicant paid emissions fees for the most recent agency fiscal year (September 1 - August 31)?						<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO <input type="checkbox"/> N/A
<b>V. Delinquent Fees and Penalties</b>						
Notice: This form will not be processed until all delinquent fees and/or penalties owed to the TCEQ or the Office of the Attorney General on behalf of the TCEQ are paid in accordance with the Delinquent Fee and penalty protocol.						

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

Date: 10/07/2025
Permit No.: O1373
Regulated Entity No.: RN102926920
Company Name: INEOS Americas LLC

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		R-1			
2	MS-C		PAINTAREA			
3	SIG-E	NO	see Form OP-ACPS	OP-ACPS	N/A	Updating the Compliance Schedule by submitting Form OP-ACPS showing those compliance items that have been completed (shown as strikethroughs throughout entire form) as well as updates to items that are still being completed (shown as new information highlighted in blue).

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

Date: 10/07/2025	
Permit No.: O1373	
Regulated Entity No.: RN102926920	
Company Name: INEOS Americas LLC	
<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?	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO
B. Indicate the alternate language(s) in which public notice is required:	Spanish
C. Will there be a change in air pollutant emissions as a result of the significant revision?	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO

**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:

<b>Pollutant</b>	<b>Description of the Change in Pollutant Emissions</b>
N/A	N/A

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

<b>Date:</b> October 7, 2025	<b>Regulated Entity No.:</b> RN102926920	<b>Permit No.:</b> O1373
<b>Company Name:</b> INEOS Americas LLC		<b>Area Name:</b> Bayport EO Plant

- 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* (Indicate response by entering an "X" in the appropriate column)</b>	
1. 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
2. Are there any non-compliance situations addressed in the Compliance Schedule Section of this form (Part 2)?	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO
3. 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>	<div style="border: 1px solid black; padding: 2px; display: inline-block;">12</div> <i>Note: Seven of the enclosed Part 2 attachments are deletions.</i>
<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

Date: October 7, 2025	Regulated Entity No.: RN102926920	Permit No.: O1373
Company Name: INEOS Americas LLC		Area Name: Bayport EO Plant

**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. (See form instruction for details.) 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): <del>TK-4703</del>		
SOP Index No.: <del>N/A</del>		
Pollutant: <del>VOC</del>		
<b>Applicable Requirement</b>		
Citation	Text Description	
<del>30 TAC §116.10 30 TAC §115.112(e) 40 CFR §63.119(a)(1)</del>	<del>Storage tanks storing material above certain vapor pressures must be controlled by a floating roof or venting through a closed vent system to a control device.</del>	
<b>2. Compliance Status Assessment Method and Records Location</b>		
Citation	Text Description	Location of Records/Documentation
<del>30 TAC §115.112(e) 30 TAC §63.119(a)(1)</del>	<del>Storage vessel shall be controlled by the applicable methods prescribed under 40 CFR §63.119(a)(1) and 30 TAC §115.112(e).</del>	<del>On-site</del>
<b>3. Non-compliance Situation Description</b>		
<del>Equistar cannot confirm that the storage tanks are either exempt from controls or that the current controls are compliant. The pressure control systems on certain fixed roof tanks were designed such that the pressure set points of the PCV on the outlet line from the tank to the scrubber may overlap with the pressure set points for the pressure relief devices that allow emergency venting directly to the atmosphere. Therefore, there may be times when the pressure relief device to atmosphere opens prior to the PCV to the scrubber opening resulting in the gases being diverted to the atmosphere instead of being routed to the scrubber for control. The most stringent rules should be applied until applicability is determined.</del>		
<b>4. Corrective Action Plan Description</b>		
<del>Evaluate tanks and pressure relief device settings to determine and implement necessary changes to meet control requirements.</del>		
<b>5. List of Activities/Milestones to Implement the Corrective Action Plan</b>		
<del>Complete any necessary changes by 12/31/2024 (estimated date of next scheduled turnaround).</del>		

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<b>Date:</b> October 7, 2025	<b>Regulated Entity No.:</b> RN102926920	<b>Permit No.:</b> O1373
<b>Company Name:</b> INEOS Americas LLC		<b>Area Name:</b> Bayport EO Plant

**Part 2 (continued)**

<b>6. Previously Submitted Compliance Plan(s)</b>	
<b>Type of Action</b>	<b>Date Submitted</b>
<i>N/A</i>	
<b>7. Progress Report Submission Schedule</b>	
<i>Progress reports will be submitted every 6 calendar months starting at renewal of this FOP.</i>	

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

<b>Date:</b> October 7, 2025	<b>Regulated Entity No.:</b> RN102926920	<b>Permit No.:</b> O1373
<b>Company Name:</b> INEOS Americas LLC		<b>Area Name:</b> Bayport EO Plant

**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): <i>WASTEWATER</i>		
SOP Index No.: <i>N/A</i>		
Pollutant: <i>VOC &amp; HAP</i>		
<b>Applicable Requirement</b>		
<b>Citation</b>	<b>Text Description</b>	
<i>NSR Permit 6257E Special Condition 1 30 TAC §116.115(c)</i>	<i>SC1: Permit holder must comply with all special conditions contained in the NSR Permit including the emission rates listed in the MAERT.  (c) Special conditions. The holders of permits, special permits, standard permits, and special exemptions shall comply with all special conditions contained in the permit document.</i>	
<b>2. Compliance Status Assessment Method and Records Location</b>		
<b>Citation</b>	<b>Text Description</b>	<b>Location of Records/Documentation</b>
<i>NSR Permit 6257E Special Condition 1</i>	<i>Emission increases have not been evaluated via NSR Permit, PBR, Standard Permit and Title V Permit process.</i>	<i>On-site</i>
<b>3. Non-compliance Situation Description</b>		
<i>Process wastewater streams routed to the wastewater system result in emissions higher than authorized in Permit No. 6257E. The characteristics of certain wastewater streams result in changed rule applicability of the HON and Chapter 115 industrial wastewater rules, including the need for controls on affected wastewater system components.</i>		
<b>4. Corrective Action Plan Description</b>		
<i>The site quantified process wastewater streams and applied for a permit amendment to authorize increased emissions for the wastewater system. Controls to reduce emissions will be installed as required by the NSR permit process.</i>		
<b>5. List of Activities/Milestones to Implement the Corrective Action Plan</b>		
<i>Submitted an amendment application for NSR Permit 6257E on 06/30/2022.</i>		
<i>NSR 6257E Permit Amendment was issued on 6/14/2023 (TCEQ Project Number 343829).</i>		
<i>Install controls authorized via NSR Permit 6257E amendment. The controls are expected to be completed by December 31, 2026 for the RTO and December 31, 2025 for the EO railcar loading and EOD condensate projects per an extension request.</i>		

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

<b>Date:</b> October 7, 2025	<b>Regulated Entity No.:</b> RN102926920	<b>Permit No.:</b> O1373
<b>Company Name:</b> INEOS Americas LLC		<b>Area Name:</b> Bayport EO Plant

**Part 2 (continued)**

*Submit a Title V revision application to update 40 CFR Part 63, Subpart G and 30 TAC Chapter 115, Industrial Wastewater applicability, if necessary, no later than six months after installation of the controls authorized by NSR Permit 6257E amendment (TCEQ Project Number 343829.)*

<b>6. Previously Submitted Compliance Plan(s)</b>	
<b>Type of Action</b>	<b>Date Submitted</b>
<i>N/A</i>	
<b>7. Progress Report Submission Schedule</b>	
<i>The periodic progress report with updates communicated to TCEQ on the DOV status, will constitute meeting this requirement.</i>	

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

Date: October 7, 2025	Regulated Entity No.: RN102926920	Permit No.: O1373
Company Name: INEOS Americas LLC		Area Name: Bayport EO Plant

**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. (See form instruction for details.) 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): <i>WASTEWATER</i>		
SOP Index No.: <i>N/A</i>		
Pollutant: <i>VOC &amp; HAP</i>		
<b>Applicable Requirement</b>		
<b>Citation</b>	<b>Text Description</b>	
40 CFR Subpart A §63.9 40 CFR Subpart G § 63.132, § 63.136; §§ 63.138-.149; § 63.152 30 TAC § § 115.142-149	63.132 (a) Existing sources. This paragraph specifies the requirements applicable to process wastewater streams located at existing sources. The owner or operator shall comply with the requirements in paragraphs (a)(1) through (a)(3) of this section, no later than the applicable dates specified in § 63.100 of subpart F of this part.	
<b>2. Compliance Status Assessment Method and Records Location</b>		
<b>Citation</b>	<b>Text Description</b>	<b>Location of Records/Documentation</b>
40 CFR Subpart G § 63.132, § 63.136; § 63.138-.149; § 63.152 30 TAC §§ 115.142-149	Site is not showing compliance with applicable HON and Chapter 115 requirements at this location.	On-site
<b>3. Non-compliance Situation Description</b>		
<i>The "Force Main," which is part of the wastewater system Group 1 wastewater control system, has been incorrectly classified as a junction box. In addition, the Force Main no longer operates with only slight fluctuations to the liquid flow. Further, Equistar cannot demonstrate that the water seal at the exit of the Force Main is being maintained to restrict ventilation in the individual drain system and between components in the individual drain system.</i>		
<b>4. Corrective Action Plan Description</b>		
<i>The site will take measures to bring the Force Main into compliance with applicable HON and Chapter 115 requirements, as part of the controls to reduce emissions from the Bayport wastewater system.</i>		
<b>5. List of Activities/Milestones to Implement the Corrective Action Plan</b>		
<i>The site will take measures to bring the Force Main into compliance with applicable HON and Chapter 115 requirements as part of the project to reduce emissions from the wastewater system <b>by December 31, 2025 for the EOD condensate projects per an extension request.</b></i>		

Commented [MM1]: Add Ch 115 text ??

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

<b>Date:</b> October 7, 2025	<b>Regulated Entity No.:</b> RN102926920	<b>Permit No.:</b> O1373
<b>Company Name:</b> INEOS Americas LLC		<b>Area Name:</b> Bayport EO Plant

**Part 2 (continued)**

<b>6. Previously Submitted Compliance Plan(s)</b>	
<b>Type of Action</b>	<b>Date Submitted</b>
<i>N/A</i>	
<b>7. Progress Report Submission Schedule</b>	
<i>The periodic progress report with updates communicated to TCEQ on the DOV status, will constitute meeting this requirement.</i>	

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Form OP-ACPS  
Application Compliance Plan and Schedule**

Date: October 7, 2025	Regulated Entity No.: RN102926920	Permit No.: O1373
Company Name: INEOS Americas LLC		Area Name: Bayport EO Plant

**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): <del>WASTEWATER</del>		
SOP Index No.: <del>N/A</del>		
Pollutant: <del>VOC &amp; HAP</del>		
<b>Applicable Requirement</b>		
Citation	Text Description	
<del>30 TAC § 116.110(a)</del>	<del>All emissions must be authorized via NSR Permit, PBR, Standard Permit and Title V Permit before construction/operation.</del>	
<b>2. Compliance Status Assessment Method and Records Location</b>		
Citation	Text Description	Location of Records/Documentation
<del>§30 TAC § 116.110(a) 40 CFR Subpart G § 63.132, § 63.134, § 63.136, § 63.138-149 40 CFR Subpart G § 63.152</del>	<del>Emissions have not been evaluated via NSR Permit, PBR, Standard</del>	<del>On-site</del>
<b>3. Non-compliance Situation Description</b>		
<del>The wastewater treatment system utilizes an overflow pond that has no authorized air emissions. The overflow pond has been considered exempt from Chapter 115 and HON wastewater requirements; however, the presence of normal operation wastewater in the overflow pond means the pond is subject to both Chapter 115 industrial wastewater rule and HON requirements.</del>		
<b>4. Corrective Action Plan Description</b>		
<del>The site quantified unauthorized emissions from the overflow pond and applied for a permit amendment to authorize these emissions for the wastewater system. Controls to reduce emissions will be installed as required by the NSR permit process.</del>		
<b>5. List of Activities/Milestones to Implement the Corrective Action Plan</b>		
<del>Mitigate normal operation wastewater from entering the overflow pond, expected by 12/31/2024.</del>		

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<b>Date:</b> October 7, 2025	<b>Regulated Entity No.:</b> RN102926920	<b>Permit No.:</b> O1373
<b>Company Name:</b> INEOS Americas LLC		<b>Area Name:</b> Bayport EO Plant

**Part 2 (continued)**

<b>6. Previously Submitted Compliance Plan(s)</b>	
<b>Type of Action</b>	<b>Date Submitted</b>
<i>N/A</i>	
<b>7. Progress Report Submission Schedule</b>	
<i>The periodic progress report with updates communicated to TCEQ on the DOV status, will constitute meeting this requirement.</i>	

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

Date: October 7, 2025	Regulated Entity No.: RN102926920	Permit No.: O1373
Company Name: INEOS Americas LLC		Area Name: Bayport EO Plant

**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): <i>WASTEWATER</i>		
SOP Index No.: <i>N/A</i>		
Pollutant: <i>VOC &amp; HAP</i>		
<b>Applicable Requirement</b>		
<b>Citation</b>	<b>Text Description</b>	
<i>NSR Permit 83663 Special Condition 1 NSR Permit 6257E Special Condition 1 30 TAC § 116.115(c)</i>	<i>SC1: Permit holder must comply with all special conditions contained in the NSR Permit including the emission rates listed in the MAERT. (c) Special conditions. The holders of permits, special permits, standard permits, and special exemptions shall comply with all special conditions contained in the permit document.</i>	
<b>2. Compliance Status Assessment Method and Records Location</b>		
<b>Citation</b>	<b>Text Description</b>	<b>Location of Records/Documentation</b>
<i>NSR Permit 83663 Special Condition 1 NSR Permit 6257E Special Condition 1</i>	<i>Emissions have not been evaluated via NSR Permit, PBR, Standard Permit and Title V Permit process.</i>	<i>On-site</i>
<b>3. Non-compliance Situation Description</b>		
<i>Emissions associated with maintenance, startup, and shutdown (MSS) and campaign change activities are not properly authorized in the existing authorization for emissions from the wastewater system in either Permit No.83663 or 6257E. Additional MSS and campaign change activity contributions to wastewater streams result in changed rule applicability of the HON and Chapter 115 industrial wastewater rules, including the need for control requirements on affected wastewater system components.</i>		
<b>4. Corrective Action Plan Description</b>		
<i>The site quantified MSS and campaign change activities and applied for a permit amendment to authorize increased emissions for the wastewater system. Controls to reduce emissions will be installed as required by the NSR permit process.</i>		
<b>5. List of Activities/Milestones to Implement the Corrective Action Plan</b>		
<i>Submitted an amendment application for NSR Permit 6257E on 06/30/2022.</i>		
<i>NSR 6257E Permit Amendment was issued on 6/14/2023 (TCEQ Project Number 343829).</i>		

Part 2

<b>A. Compliance Schedule</b>
<i>Install controls authorized via NSR Permit 6257E amendment. The controls are expected to be completed by December 31, 2026 for the RTO and by December 31, 2025 for the EO railcar loading and EOD condensate projects per an extension request.</i>
<i>Submit a Title V revision application to update 40 CFR Part 63, Subpart G and 30 TAC Chapter 115, Industrial Wastewater applicability, if necessary, no later than six months after installation of the controls authorized by NSR Permit 6257E amendment (TCEQ Project Number 343829).</i>

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Application Compliance Plan and Schedule

Date: October 7, 2025	Regulated Entity No.: RN102926920	Permit No.: O1373
Company Name: INEOS Americas LLC	Area Name: Bayport EO Plant	

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>	
<i>The periodic progress report with updates communicated to TCEQ on the DOV status, will constitute meeting this requirement.</i>	

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

Date: October 7, 2025	Regulated Entity No.: RN102926920	Permit No.: O1373
Company Name: INEOS Americas LLC		Area Name: Bayport EO Plant

**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. (See form instruction for details.) 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): <del>WASTEWATER</del>		
SOP Index No.: <del>N/A</del>		
Pollutant: <del>VOC &amp; HAP</del>		
<b>Applicable Requirement</b>		
Citation Text Description	Citation Text Description	
<del>NSR Permit 83663 Special Condition 7 30 TAC § 116.115(e)</del>	<del>Permit holder must comply with all special conditions contained in the NSR Permit including the emission rates listed in the MAERT. (e) Special conditions. The holders of permits, special permits, standard permits, and special exemptions shall comply with all special conditions contained in the permit document.</del>	
<b>2. Compliance Status Assessment Method and Records Location</b>		
Citation	Text Description	Location of Records/Documentation
<del>NSR Permit 83663 Special Condition 7</del>	<del>Site operation not meeting Special Condition 7 for all applicable streams.</del>	<del>On-site</del>
<b>3. Non-compliance Situation Description</b>		
<del>MSS and campaign change activities are not being conducted in compliance with the requirements of Special Condition 7 in Permit 83663.</del>		
<b>4. Corrective Action Plan Description</b>		
<del>Measures will be taken to meet the MSS and campaign change requirements of Special Condition 7 in Permit 83663, such as installing hard piping, routing to control, and/or operational procedure change.</del>		
<b>5. List of Activities/Milestones to Implement the Corrective Action Plan</b>		
<del>Measures will be taken to meet the MSS and campaign change requirements of Special Condition 7 in Permit 83663, by 12/31/2024.</del>		

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<b>Date:</b> October 7, 2025	<b>Regulated Entity No.:</b> RN102926920	<b>Permit No.:</b> O1373
<b>Company Name:</b> INEOS Americas LLC		<b>Area Name:</b> Bayport EO Plant

**Part 2 (continued)**

<b>6. Previously Submitted Compliance Plan(s)</b>	
<b>Type of Action</b>	<b>Date Submitted</b>
<i>N/A</i>	
<b>7. Progress Report Submission Schedule</b>	
<i>The periodic progress report with updates communicated to TCEQ on the DOV status, will constitute meeting this requirement.</i>	

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

<b>Date:</b> October 7, 2025	<b>Regulated Entity No.:</b> RN102926920	<b>Permit No.:</b> O1373
<b>Company Name:</b> INEOS Americas LLC		<b>Area Name:</b> Bayport EO Plant

**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. (See form instruction for details.) 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): <i>WASTEWATER</i>		
SOP Index No.: <i>N/A</i>		
Pollutant: <i>VOC &amp; HAP</i>		
<b>Applicable Requirement</b>		
<b>Citation</b>	<b>Text Description</b>	
<i>NSR Permit 6257E Special Condition 1 30 TAC 116.115(c)</i>	<i>SCI: Permit holder must comply with all special conditions contained in the NSR Permit including the emission rates listed in the MAERT. (c) Special conditions. The holders of permits, special permits, standard permits, and special exemptions shall comply with all special conditions contained in the permit document.</i>	
<b>2. Compliance Status Assessment Method and Records Location</b>		
<b>Citation</b>	<b>Text Description</b>	<b>Location of Records/Documentation</b>
<i>NSR Permit 6257E Special Condition 1</i>	<i>Emission have not been evaluated via NSR Permit, PBR, Standard Permit and Title V Permit process.</i>	<i>On-site</i>
<b>3. Non-compliance Situation Description</b>		
<i>A vent from the EOD condensate system that is routed to the wastewater sump contains ethylene oxide (EO) and other VOC emissions that exceed the current permit representations for EPN: UAD/PWW.</i>		
<b>4. Corrective Action Plan Description</b>		
<i>The site applied for a permit amendment to authorize increased emissions for the wastewater system. Controls to reduce emissions will be installed as required by the NSR permit process and applicable provisions of a compliance agreement dated 10/28/2021 and signed on 11/5/2021, as part of Investigation No. 1552706.</i>		
<b>5. List of Activities/Milestones to Implement the Corrective Action Plan</b>		
<i>Submitted an amendment application for NSR Permit 6257E on 06/30/2022.</i>		
<i>NSR 6257E Permit Amendment was issued on 6/14/2023 (TCEQ Project Number 343829).</i>		
<i>Install controls by authorized via NSR Permit 6257E amendment. The controls are expected to be completed by December 31,</i>		

Part 2

<b>A. Compliance Schedule</b>
<b>2025 for the EOD condensate project per an extension request.</b>
<i>Submit a Title V revision application to update 40 CFR Part 63, Subpart G and 30 TAC Chapter 115, Industrial Wastewater applicability, if necessary, no later than six months after installation of the controls authorized by NSR Permit 6257E amendment (TCEQ Project Number 343829).</i>

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<b>Date:</b> October 7, 2025	<b>Regulated Entity No.:</b> RN102926920	<b>Permit No.:</b> O1373
<b>Company Name:</b> INEOS Americas LLC	<b>Area Name:</b> Bayport EO Plant	

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>	
<i>The periodic progress report with updates communicated to TCEQ on the DOV status, will constitute meeting this requirement.</i>	

**Texas Commission on Environmental Quality  
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Application Compliance Plan and Schedule**

Date: October 7, 2025	Regulated Entity No.: RN102926920	Permit No.: O1373
Company Name: INEOS Americas LLC		Area Name: Bayport EO Plant

**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): <i>EOFUG</i>		
SOP Index No.: <i>HSD-1</i>		
Pollutant: <i>VOC</i>		
<b>Applicable Requirement</b>		
Citation	Text Description	
<i>NSR Permit 6257E Special Condition 1 30 TAC 115.352(4)</i>	<i>SCI: Permit holder must comply with all special conditions contained in the NSR Permit including the emission rates listed in the MAERT. (c) Special conditions. The holders of permits, special permits, standard permits, and special exemptions shall comply with all special conditions contained in the permit document.</i>	
<b>2. Compliance Status Assessment Method and Records Location</b>		
Citation	Text Description	Location of Records/Documentation
<i>NSR Permit 6257E Special Condition 1</i>	<i>Emission have not been evaluated via NSR Permit, PBR, Standard Permit and Title V Permit process.</i>	<i>On-site</i>
<b>3. Non-compliance Situation Description</b>		
<i>Four uncapped open ended lines (OELs) were found on a chemical injection system.</i>		
<b>4. Corrective Action Plan Description</b>		
<i>A project will be implemented to modify the piping on the chemical injection system to eliminate the four OELs during the 2024 Turnaround.</i>		
<b>5. List of Activities/Milestones to Implement the Corrective Action Plan</b>		
<i>Modification of piping on the chemical injection system to eliminate the four open ended lines, expected by 12/31/2024.</i>		

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<b>Date:</b> October 7, 2025	<b>Regulated Entity No.:</b> RN102926920	<b>Permit No.:</b> O1373
<b>Company Name:</b> INEOS Americas LLC		<b>Area Name:</b> Bayport EO Plant

**Part 2 (continued)**

<b>6. Previously Submitted Compliance Plan(s)</b>	
<b>Type of Action</b>	<b>Date Submitted</b>
<i>N/A</i>	
<b>7. Progress Report Submission Schedule</b>	
<i>Progress reports will be submitted every six calendar months starting at the effective date of this FOP.</i>	

Texas Commission on Environmental Quality  
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Date: October 7, 2025	Regulated Entity No.: RN102926920	Permit No.: O1373
Company Name: INEOS Americas LLC		Area Name: Bayport EO Plant

**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. (See form instruction for details.) 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): <del>P-3, P-15, P-25</del>		
SOP Index No.: <del>N/A</del>		
Pollutant: <del>HAP</del>		
<b>Applicable Requirement</b>		
Citation	Text Description	
<del>Federal Operating Permit O1373 Special Condition 1 NSR Permit 6257E Special Condition 1;</del>	<del>SC1: Permit holder must comply with all special conditions contained in the NSR Permit including the emission rates listed in the MAERT. (e) Special conditions. The holders of permits, special permits, standard permits, and special exemptions shall comply with all special conditions contained in the permit document.</del>	
<b>2. Compliance Status Assessment Method and Records Location</b>		
Citation	Text Description	Location of Records/Documentation
<del>NSR Permit 6257E Special Condition 1</del>	<del>Emission have not been evaluated via NSR Permit, PBR, Standard Permit and Title V Permit process.</del>	<del>On-site</del>
<b>3. Non-compliance Situation Description</b>		
<del>Emissions associated with addition of a moderator to the ethylene oxide reactor and ancillary equipment systems are not properly authorized in the existing authorization for emissions in Permit 6257E.</del>		
<b>4. Corrective Action Plan Description</b>		
<del>The site will apply for a permit authorization to include the emissions associated with the moderator addition to the ethylene reactor and ancillary equipment systems. If required by the NSR permit process and applicable regulations, install controls to reduce emissions. The corrective actions will be completed in accordance with the schedule in the DOV submitted to the TCEQ.</del>		
<b>5. List of Activities/Milestones to Implement the Corrective Action Plan</b>		
<del>Apply for a permit authorization to include the emissions associated with the moderator addition to the ethylene reactor and ancillary equipment systems with submittal target of 11/30/2023.</del>		

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Form OP-ACPS  
Application Compliance Plan and Schedule**

Date: October 7, 2025	Regulated Entity No.: RN102926920	Permit No.: O1373
Company Name: INEOS Americas LLC		Area Name: Bayport EO Plant

**Part 2 (continued)**

<b>6. Previously Submitted Compliance Plan(s)</b>	
Type of Action	Date Submitted
<i>N/A</i>	
<b>7. Progress Report Submission Schedule</b>	
<i>The periodic progress report with updates communicated to TCEQ on the DOV status, will constitute meeting this requirement.</i>	

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

<b>Date:</b> October 7, 2025	<b>Regulated Entity No.:</b> RN102926920	<b>Permit No.:</b> O1373
<b>Company Name:</b> INEOS Americas LLC		<b>Area Name:</b> Bayport EO Plant

**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): <i>P-3, P-4, P-5, P-6, P-10, P-102</i>		
SOP Index No.: <i>N/A</i>		
Pollutant: <i>VOC, HAP</i>		
<b>Applicable Requirement</b>		
<b>Citation</b>	<b>Text Description</b>	
<i>Federal Operating Permit O1373 Special Condition 1</i>	<i>SC1: A. Emission units (including groups and processes) in the Applicable Requirements Summary attachment shall meet the limitations, standards, equipment specifications, monitoring, recordkeeping, reporting, testing, and other requirements listed in the Applicable Requirements Summary attachment to assure compliance with the permit.</i>	
<b>2. Compliance Status Assessment Method and Records Location</b>		
<b>Citation</b>	<b>Text Description</b>	<b>Location of Records/Documentation</b>
<i>Federal Operating Permit O1373 Special Condition 1</i>	<i>Site lacks sufficient documentation to verify that all regulatory applicability and associated requirements are included in Title V permit O1373 for the noted process vents.</i>	<i>On-site</i>
<b>3. Non-compliance Situation Description</b>		
<i>Site lacks sufficient documentation to verify that all regulatory applicability and associated requirements are included in Title V permit O1373 for the following process vents: P-3 (CO2 Stripper), P-4 (Ethylene Oxide Vent Absorber), P-5 (Ethylene Glycol Dehydration System Vacuum Vent Condenser), P-6 (Monoethylene Glycol Column Vacuum Vent Condenser), P-10 (Glycol Recovery Vacuum Vent Condenser), P-102 (Ethanolamine Refinery Vacuum System After Condenser).</i>		
<b>4. Corrective Action Plan Description</b>		
<i>The site will conduct compliance testing to evaluate regulatory applicability. Title V permit and NSR permit amendments will be submitted as needed for any regulatory and emission representation updates.</i>		
<b>5. List of Activities/Milestones to Implement the Corrective Action Plan</b>		

Part 2

<b>A. Compliance Schedule</b>
<i>Complete compliance testing of process vents P-3, P-4, and P-102 prior to the 2024 site turnaround in order to assess regulatory applicability by 1/27/2024. The compliance testing of process vents P-3, P-4, and P-102 has been completed.</i>
<i>Complete compliance testing of process vents P-5, P-6, and P-10 after the 2024 plantwide turnaround in order to complete testing at sufficient emission rate conditions. Compliance testing to be completed by 8/30/2024. The compliance testing of process vents P-5, P-6, and P-10 has been completed. The test results indicated that P-6 process vent emissions exceeded the current NSR permit allowable. Pursuant to 63.100(k)(11), the process vents must come into compliance with the new HON rule by July 15, 2026 or by any approved extension dates. Implementation of the plan for HON compliance will include the completion, submittal, and approval of a permit amendment as well as the construction of the project to route the process vents to the RTOs for control. Install controls authorized via NSR Permit 6257E amendment. The controls are expected to be completed by December 31, 2026 for the RTO per an extension request.</i>
<i>As needed, submit Title V permit amendment with resolved regulatory applicability and NSR Permit amendment application for any needed emission representation updates by 10/15/2024.</i>

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

Date: October 7, 2025	Regulated Entity No.: RN102926920	Permit No.: O1373
Company Name: INEOS Americas LLC		Area Name: Bayport EO Plant

Part 2 (continued)

<b>6. Previously Submitted Compliance Plan(s)</b>	
Type of Action	Date Submitted
N/A	
<b>7. Progress Report Submission Schedule</b>	
<i>The periodic progress report with updates communicated to TCEQ on the DOV status, will constitute meeting this requirement.</i>	

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

Date: October 7, 2025	Regulated Entity No.: RN102926920	Permit No.: O1373
Company Name: INEOS Americas LLC		Area Name: Bayport EO Plant

**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. (See form instruction for details.) 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): <del>PAINTAREA</del>		
SOP Index No.: <del>HSE-2</del>		
Pollutant: <del>VOC</del>		
<b>Applicable Requirement</b>		
Citation	Text Description	
<del>30 TAC 115.451(a)(3) 30 TAC 115.453(e)</del>	<del>Surface coating processes on a property where total coating and solvent usage does not exceed 150 gallons in any consecutive 12-month period are exempt from the VOC limits in §115.453(a) of this title.</del>	
<b>2. Compliance Status Assessment Method and Records Location</b>		
Citation	Text Description	Location of Records/Documentation
<del>§115.458(b)</del>	<del>(3) As an alternative to the recordkeeping requirements of paragraph (2) of this subsection, the owner or operator that qualifies for exemption under §115.451(a)(3) of this title (relating to Exemptions) may maintain records of the total gallons of coating and solvent used in each month and total gallons of coating and solvent used in the previous 12 months.</del>	<del>On-site</del>
<b>3. Non-compliance Situation Description</b>		
<del>Preliminary review of the surface coating/solvent usage records indicates that the 115.451(a)(3) exemption restriction may not have been continuously met and site cannot currently confirm compliance with 30 TAC 115.453(a).</del>		
<b>4. Corrective Action Plan Description</b>		
<del>An evaluation of the surface coating/solvent usage status will be performed. Based on the results of the evaluation, corrective action(s) will be developed and implemented to ensure compliance with the applicable regulations. A Title V permit update will be submitted if needed to reflect the appropriate regulatory applicability and requirements.</del>		
<b>5. List of Activities/Milestones to Implement the Corrective Action Plan</b>		
<del>Evaluate site surface coating/solvent usage to determine compliance status by 2/28/2025. Evaluation of site surface coating/solvent usage completed and determine that the site complies with PBR limits but not the control and</del>		

Part 2

<b>A. Compliance Schedule</b>
<del>recordkeeping requirements.</del>
<del>Develop and implement needed correction action(s) to meet applicable requirements by 8/31/2025.</del>
<del>Submit Title V Permit update if needed by 8/31/2025.</del>

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

Date: October 7, 2025	Regulated Entity No.: RN102926920	Permit No.: O1373
Company Name: INEOS Americas LLC	Area Name: Bayport EO Plant	

Part 2 (continued)

<b>6. Previously Submitted Compliance Plan(s)</b>	
Type of Action	Date Submitted
N/A	N/A
<b>7. Progress Report Submission Schedule</b>	
<del>Progress reports will be submitted every six calendar months starting at the effective date of this FOP.</del>	

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

<b>Date:</b> October 7, 2025	<b>Regulated Entity No.:</b> RN102926920	<b>Permit No.:</b> O1373
<b>Company Name:</b> INEOS Americas LLC		<b>Area Name:</b> Bayport EO Plant

**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): <del>N/A</del>		
SOP Index No.: <del>N/A</del>		
Pollutant: <del>VOC</del>		
<b>Applicable Requirement</b>		
<b>Citation</b>	<b>Text Description</b>	
<del>30 TAC §116.110 NSR Permit 6257F Special Condition 1</del>	<del>Permit holder must comply with all special conditions contained in the NSR Permit including the emission rates listed in the MAERT.</del>	
<b>2. Compliance Status Assessment Method and Records Location</b>		
<b>Citation</b>	<b>Text Description</b>	<b>Location of Records/Documentation</b>
<del>NSR Permit 6257F Special Condition 1</del>	<del>Unauthorized emissions are ongoing from leak.</del>	<del>On-site</del>
<b>3. Non-compliance Situation Description</b>		
<del>A recordable emissions event occurred when a leak developed on a line at the raw materials scrubber resulting in the release of emissions to the atmosphere.</del>		
<b>4. Corrective Action Plan Description</b>		
<del>A temporary clamp was installed on the line to minimize the leak. Permanent repairs will be made to the line to stop the leak during the 2024 site turnaround.</del>		
<b>5. List of Activities/Milestones to Implement the Corrective Action Plan</b>		
<del>Permanent repairs will be made no later than during the planned turnaround (plant outage) in 2024.</del>		

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

<b>Date:</b> October 7, 2025	<b>Regulated Entity No.:</b> RN102926920	<b>Permit No.:</b> O1373
<b>Company Name:</b> INEOS Americas LLC		<b>Area Name:</b> Bayport EO Plant

**Part 2 (continued)**

<b>6. Previously Submitted Compliance Plan(s)</b>	
<b>Type of Action</b>	<b>Date Submitted</b>
<i>N/A</i>	
<b>7. Progress Report Submission Schedule</b>	
<i>Progress reports will be submitted every six calendar months starting at the effective date of this FOP.</i>	

# INEOS Oxide

INEOS Americas LLC  
5761 Underwood Road  
Pasadena, Texas 77507  
Tel +1 281 474 4040

June 27, 2025

**CERTIFIED MAIL 9589.0710.5270.1217.4853.97**  
Texas Commission on Environmental Quality (TCEQ)  
Attn: Air Permits Division, MC-163  
P.O. Box 13087  
Austin, TX 78711-3087

**Re: Duly Authorized Representative (DAR) Updates**  
INEOS Americas LLC – Bayport EO Plant  
TCEQ Air Account No. HG-1996-R  
Title V Permit No. O1373  
Regulated Entity No. RN102926920  
Customer Reference No. CN602805236

Dear Sir or Madam:

INEOS Americas LLC – Bayport EO Plant is submitting the attached OP-DEL form to update the Duly Authorized Representative (DAR) for the facility. The following attachment is enclosed:

Attachment 1: OP-DEL

Please contact Carlisa Navy, Environmental Engineer, at 281-474-0727 or by email at [carlisa.navy@ineos.com](mailto:carlisa.navy@ineos.com) if there are any questions concerning this submittal.

Sincerely,

  
Kevin McGovern  
General Manager  
INEOS Americas LLC – Bayport EO Plant

AIR PERMITS DIVISION  
JUL 03 2025  
RECEIVED

cc: Regional Director  
Texas Commission on Environmental Quality (TCEQ) – Region 12  
5425 Polk St., Ste. H  
Houston, TX 77023-1452  
**Certified Mail Receipt No. 9589.0710.5270.1217.4854.03**

[R6AirPermitsTX@epa.gov](mailto:R6AirPermitsTX@epa.gov)

Environmental Department Files

**ATTACHMENT 1:**  
**OP-DEL Form**

**Form OP-DEL**  
**Delegation of Responsible Official Information**  
**Federal Operating Permit Program**  
**Texas Commission on Environmental Quality**

<b>I. Identifying Information</b>	
Account Number:	HG-1996-R
Regulated Entity Number: RN	RN102926920
Customer Reference Number: CN	CN602805236
Permit Number:	O1373
Area Name:	Bayport EO Plant
Company Name:	INEOS Americas LLC
<b>II. Duly Authorized Representative Information</b>	
Action Type:	
<input checked="" type="checkbox"/> New DAR Identification	
<input type="checkbox"/> Administrative Information Change	
Conventional Title:	
<input checked="" type="checkbox"/> Mr.	
<input type="checkbox"/> Mrs.	
<input type="checkbox"/> Ms.	
<input type="checkbox"/> Dr.	
Name (Driver License/STEERS):	Sean Greer
Title:	Operations Manager
Delegation Effective Date:	6/30/25
Telephone Number:	281-474-0706
Fax Number:	N/A
Company Name:	INEOS Americas LLC
Mailing Address:	5761 Underwood Road
City:	Pasadena
State:	TX
ZIP Code:	77507
Email Address:	sean.greer@ineos.com

**AIR PERMITS DIVISION**

**JUL 03 2025**

**RECEIVED**

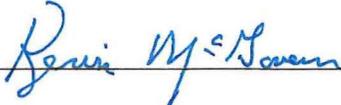
Form OP-DEL  
Delegation of Responsible Official Information  
Federal Operating Permit Program  
Texas Commission on Environmental Quality

**III. Certification of Truth, Accuracy, and Completeness**

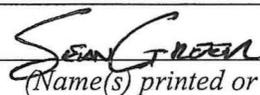
I, Kevin McGovern

*(Name printed or typed: RO for New DAR Identification; RO or DAR for Administrative Information Change)*

Certify that, based on information and belief formed after reasonable inquiry, the statements, and information stated above are true, accurate, and complete. *(RO signature required for New DAR Identification only; DAR signature required for any Action Type)*

Responsible Official Signature: 

Date: 6/27/25

Duly Authorized Representative Signature: 

*(Name(s) printed or typed)*

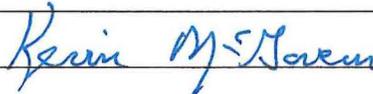
Date: 6/27/25

**IV. Removal of Duly Authorized Representative(s)**

The following should be removed as Duly Authorized Representative(s):  
Kevin Krengle

*(Name(s) printed or typed)*

Effective Date: 6/30/25

Responsible Official Signature: 

Date: 06/27/2025

**STREAMLINED MINOR REVISION  
APPLICATION**  
Site Operating Permit 01373

**INEOS AMERICAS LLC  
Bayport EO Plant  
CN602805236  
RN102926920**

**Prepared By:**

Hao Zhang – Managing Consultant  
Lillian Rodriguez - Consultant

**TRINITY CONSULTANTS**

1800 West Loop South  
Suite 1000  
Houston, TX 77027  
(713) 552-1371

August 2025

Project 254402.0375



## **TABLE OF CONTENTS**

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## 1. PROJECT INFORMATION

---

INEOS AMERICAS LLC owns and operates an Ethylene Oxide plant (Bayport EO Plant), located in the Bayport Industrial Park at 5761 Underwood Road in Pasadena, Harris County, Texas. Facilities at the site are operated under Site Operating Permit (SOP) O1373. The Bayport EO Plant has been assigned TCEQ Air Quality Account No. HG-1996-R. The purpose of this application is to implement a minor revision to the SOP.

As part of this minor revision application, the following revisions are being requested:

- ▶ Per Compliance Schedule regarding Unit ID PAINTAREA, INEOS is submitting this Title V permit revision application to update applicable requirement of the painting and surface coating operations to comply with 30 TAC Chapter 115 requirement, including:
  - Removing existing permit shield for 30 TAC Chapter 115, Surface Coating Operations
  - Adding applicable requirement under 30 TAC Chapter 115, Surface Coating Operations
  - Removing existing exemption under 30 TAC Chapter 115, Subchapter E, Division 5
  - Including negative applicability of 30 TAC Chapter 115, Subchapter E, Division 5 for documentation purposes only
    - ◆ INEOS will request addition of permit shield for 30 TAC Chapter 115, Subchapter E, Division 5 in the next renewal/significant revision application.
- ▶ In addition, INEOS is requesting removal of the aforementioned Compliance Schedule upon approval of this permit revision application.

## **2. ADMINISTRATIVE FORMS**

---

This section contains the following forms and information:

- ▶ OP-2 – Application for Permit Revision/Renewal
- ▶ OP-SUM – Individual Unit Summary

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

Date: <b>8/21/2025</b>	
Permit No.: <b>O1373</b>	
Regulated Entity No.: <b>RN102926920</b>	
Company Name: <b>INEOS AMERICAS LLC</b>	
For Submissions to <b>EPA</b>	
Has an electronic copy of this application been submitted (or is being submitted) to EPA? <span style="float: right;"><input checked="" type="checkbox"/> YES <input type="checkbox"/> NO</span>	
<b>I. Application Type</b>	
Indicate the type of application:	
<input type="checkbox"/> Renewal	
<input checked="" type="checkbox"/> Streamlined Revision (Must include provisional terms and conditions as explained in the instructions.)	
<input type="checkbox"/> Significant Revision	
<input type="checkbox"/> Revision Requesting Prior Approval	
<input type="checkbox"/> Administrative Revision	
<input type="checkbox"/> Response to Reopening	
<b>II. Qualification Statement</b>	
For SOP Revisions Only <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**

<b>III. Major Source Pollutants (Complete this section if the permit revision is due to a change at the site or change in regulations.)</b>						
Indicate all pollutants for which the site is a major source based on the site's potential to emit: <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 type="checkbox"/> PM <sub>10</sub>	<input type="checkbox"/> CO	<input type="checkbox"/> Pb	<input checked="" type="checkbox"/> HAP
Other:						
<b>IV. Reference Only Requirements (For reference only)</b>						
Has the applicant paid emissions fees for the most recent agency fiscal year (September 1 - August 31)?						<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO <input type="checkbox"/> N/A
<b>V. Delinquent Fees and Penalties</b>						
Notice: This form will not be processed until all delinquent fees and/or penalties owed to the TCEQ or the Office of the Attorney General on behalf of the TCEQ are paid in accordance with the Delinquent Fee and penalty protocol.						

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

Date: 8/21/2025
Permit No.: O1373
Regulated Entity No.: RN102926920
Company Name: INEOS AMERICAS LLC

Using the table below, provide a description of the revision.

Revision No.	Revision Code	New Unit	Unit/Group	Process	NSR Authorization	Description of Change and Provisional Terms and Conditions
			ID No.	Applicable Form		
1	MS-C	NO	PAINTAREA	OP-REQ2	106.433/09/04/2000[113031]	Remove current permit shield for 30 TAC Chapter 115, Surface Coating Operations
2	MS-C	NO	PAINTAREA	OP-REQ3 OP-UA18	106.433/09/04/2000[113031]	Add applicable 30 TAC Chapter 115, Surface Coating Operations requirements.
3	MS-C	NO	PAINTAREA	OP-REQ3	106.433/09/04/2000[113031]	Remove §115.451(a)(3) exemption.
		NO	PAINTAREA	OP-REQ2	106.433/09/04/2000[113031]	The Bayport EO Plant is not subject to 30 TAC Chapter 115, Subchapter E, Division 5. However, INEOS is not requesting a permit shield to be added as part of this application.

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

Date:
Permit No.:
Regulated Entity No.:
Company Name:
<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:

<b>Pollutant</b>	<b>Description of the Change in Pollutant Emissions</b>



### **3. UNIT ATTRIBUTE FORMS**

---

This section contains the following Unit Attribute Forms:

- ▶ OP-UA18 – Surface Coating Operations Attributes

**Surface Coating Operations Attributes  
Form OP-UA18  
Federal Operating Permit Program  
Texas Commission on Environmental Quality**

**General Information**

Requested Information	Response
<b>Date:</b>	08/21/2025
<b>Customer Reference No.:</b>	CN602805236
<b>Regulated Entity No.:</b>	RN102926920
<b>Permit No.:</b>	O1373
<b>Permit Area Name:</b>	Bayport EO Plant
<b>Permit Type:</b>	SOP
<b>Project Type:</b>	Revision
<b>Submission Type:</b>	Existing Application Update
<b>Project Number (if available):</b>	
Form Information	TCEQ Entry Only
<b>Title V Form Release Date:</b>	11/2013
<b>Form Number:</b>	10024
<b>APD ID Number:</b>	53v1.0
<b>Version Revised Date:</b>	07/2025
	This form is for use by facilities subject to air quality permit requirements and may be revised periodically.

**Table 8a: Title 30 Texas Administrative Code Chapter 115 (30 TAC Chapter 115)  
 Subchapter E, Division 2: Surface Coating Processes**

Process ID No.	SOP Index No.	Alternative Compliance Method (ACM)	ACM ID No.	Facility Operations	Maintenance Shop	VOC Emission Rate	Vapor Recovery	Control Device ID No.
PAINTAREA	115E-3	NO		MISM	2012-	OTHER	NONE	

[Go to the Table of Contents](#)

**Surface Coating Operations Attributes  
Form OP-UA18  
Federal Operating Permit Program  
Texas Commission on Environmental Quality**

**Table 8b: Title 30 Texas Administrative Code Chapter 115 (30 TAC Chapter 115)  
Subchapter E, Division 2: Surface Coating Processes**

Process ID No.	SOP Index No.	Alternative Requirements (AR)	AR ID No.	Miscellaneous Coating Type	Vehicle Refinishing Coating Type	Mirror Backing	Wood Coating Type
PAINTAREA	115E-3	NO		BAKE			

[Go to the Table of Contents](#)

## **4. APPLICABLE REQUIREMENTS SUMMARY FORMS**

---

This section contains the following forms and information:

- ▶ Form OP-REQ1 – Application Area-Wide Applicability Determinations and General Information
- ▶ Form OP-REQ2 – Negative Applicable Requirements Determinations
- ▶ Form OP-REQ3 – Applicable Requirements Summary

**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.
08/21/2025	O1373	RN102926920

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):

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
6257E	06/24/2025				
6357F	01/04/2024				
83663	09/14/2020				
157440	08/21/2019				

**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.
08/21/2025	O1373	RN102926920

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
15	05/12/1981	106.371	09/04/2000	106.478	09/04/2000
51	11/05/1986	106.373	09/04/2000	106.511	09/04/2000
53	11/05/1986	106.412	09/04/2000	106.512	06/13/2001
106.261	11/01/2003	106.433	09/04/2000	106.532	09/04/2000
106.262	11/01/2003	106.452	09/04/2000		
106.263	11/01/2001	106.454	09/04/2000		
106.264	09/04/2000	106.472	09/04/2000		
106.265	09/04/2000	106.473	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



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

**Table 1a: Additions**

<b>Date:</b> 08/21/2025	<b>Regulated Entity No.:</b> RN102926920	<b>Permit No.:</b> O1373
<b>Company Name:</b> INEOS AMERICAS LLC	<b>Area Name:</b> Bayport EO Plant	

Revision No.	Unit/Group/Process ID No.	Unit/Group/Process Applicable Form	SOP/GOP Index No	Pollutant	Applicable Regulatory Requirement Name	Applicable Regulatory Requirement Standard(s)
2	PAINTAREA	OP-UA18	115E-3	VOC	30 TAC Chapter 115, Surface Coating Operations	§115.421(8)(A) 5 [R]§115.421 [R]§115.421(8)(B) [R]§115.421(8)(C) [R]§115.426

**Applicable Requirements Summary  
Form OP-REQ3 (Page 2)  
Federal Operating Permit Program**

**Table 1b: Additions**

<b>Date: 08/21/2025</b>	<b>Regulated Entity No.: RN102926920</b>	<b>Permit No.: O1373</b>
<b>Company Name: INEOS AMERICAS LLC</b>	<b>Area Name: Bayport EO Plant</b>	

<b>Revision No.</b>	<b>Unit/Group/Process ID No.</b>	<b>SOP/GOP Index No.</b>	<b>Pollutant</b>	<b>Monitoring and Testing Requirements</b>	<b>Recordkeeping Requirements</b>	<b>Reporting Requirements</b>
2	PAINTAREA	115E-3	VOC	[R]§115.424(a) [R]§115.424(b) [GR]§115.425(1) [R]§115.425(6) [GR]§115.426(1)	[R]§115.426 [GR]§115.426(1)	NONE

**Applicable Requirements Summary  
Form OP-REQ3 (Page 3)  
Federal Operating Permit Program**

**Table 2a: Deletions**

<b>Date: 08/21/2025</b>	<b>Regulated Entity No.: RN102926920</b>	<b>Permit No.: O1373</b>
<b>Company Name: INEOS AMERICAS LLC</b>	<b>Area Name: Bayport EO Plant</b>	

<b>Revision No.</b>	<b>Unit/Group/Process ID No.</b>	<b>Unit/Group/Process Applicable Form</b>	<b>SOP/GOP Index No.</b>	<b>Pollutant</b>	<b>Applicable Regulatory Requirement Name</b>	<b>Applicable Regulatory Requirement Standard(s)</b>
3	PAINTAREA	OP-REQ3	115E-2	VOC	30 TAC Chapter 115, Subchapter E, Division 5	§ 115.451(a)(1) § 115.453(e) § 115.453(e)(1)

**Applicable Requirements Summary  
Form OP-REQ3 (Page 4)  
Federal Operating Permit Program**

**Table 2b: Deletions**

<b>Date: 08/21/2025</b>	<b>Regulated Entity No.: RN102926920</b>	<b>Permit No.: O1373</b>
<b>Company Name: INEOS AMERICAS LLC</b>		<b>Area Name: Bayport EO Plant</b>

<b>Revision No.</b>	<b>Unit/Group/Process ID No.</b>	<b>Unit/Group/Process Applicable Form</b>	<b>SOP/GOP Index No.</b>	<b>Pollutant</b>	<b>Monitoring and Testing Requirements</b>	<b>Recordkeeping Requirements</b>	<b>Reporting Requirements</b>
3	PAINTAREA	OP-REQ2	115E-2	VOC	NONE	§ 115.458(b)(1) § 115.458(b)(2) § 115.458(b)(5) § 115.458(b)(7)	§ 115.453(e)(2)

**From:** apirt@tceq.texas.gov  
**Sent:** Friday, August 29, 2025 8:01 AM  
**To:** Miguel Gallegos  
**Cc:** Sean Wheeler  
**Subject:** TV 38919 & 38923  
**Attachments:** SI\_NAME%2025-08-29-08-00-55.xlsx

**Categories:** Appln Materials Collected, Added to Tracking List

Please see the attached report for STEERS Title V applications assigned to you.

## Texas Commission on Environmental Quality

Title V Existing

1373

### Site Information (Regulated Entity)

What is the name of the permit area to be authorized?	BAYPORT EO PLANT
Does the site have a physical address?	Yes
Physical Address	
Number and Street	5761 UNDERWOOD RD
City	PASADENA
State	TX
ZIP	77507
County	HARRIS
Latitude (N) (##.#####)	29.628611
Longitude (W) (-###.#####)	95.086111
Primary SIC Code	2860
Secondary SIC Code	
Primary NAICS Code	325199
Secondary NAICS Code	
Regulated Entity Site Information	
What is the Regulated Entity's Number (RN)?	RN102926920
What is the name of the Regulated Entity (RE)?	BAYPORT EO PLANT
Does the RE site have a physical address?	Yes
Physical Address	
Number and Street	5761 UNDERWOOD RD
City	PASADENA
State	TX
ZIP	77507
County	HARRIS
Latitude (N) (##.#####)	29.634722
Longitude (W) (-###.#####)	-95.086111
Facility NAICS Code	
What is the primary business of this entity?	INDUSTRIAL CHEMICAL MANUFACTURING PLANT

### Customer (Applicant) Information

How is this applicant associated with this site?	Owner Operator
What is the applicant's Customer Number (CN)?	CN602805236
Type of Customer	Corporation
Full legal name of the applicant:	
Legal Name	INEOS Americas LLC
Texas SOS Filing Number	800318204
Federal Tax ID	721383712
State Franchise Tax ID	17213837127

State Sales Tax ID	
Local Tax ID	
DUNS Number	9356563
Number of Employees	501+
Independently Owned and Operated?	Yes

## Responsible Official Contact

---

Person TCEQ should contact for questions about this application:

Organization Name	INEOS USA LLC
Prefix	MR
First	KEVIN
Middle	
Last	MCGOVERN
Suffix	
Credentials	
Title	SITE MANAGER
Enter new address or copy one from list:	
Mailing Address	
Address Type	Domestic
Mailing Address (include Suite or Bldg. here, if applicable)	5761 UNDERWOOD RD
Routing (such as Mail Code, Dept., or Attn:)	
City	PASADENA
State	TX
ZIP	77507
Phone (###-###-####)	2815354228
Extension	
Alternate Phone (###-###-####)	
Fax (###-###-####)	
E-mail	kevin.mcgovern@ineos.com

## Technical Contact

---

Person TCEQ should contact for questions about this application:

Select existing TC contact or enter a new contact.	New Contact
Organization Name	INEOS Americas LLC
Prefix	MR
First	Robert
Middle	Malcolm
Last	Vogel
Suffix	
Credentials	
Title	Environmental Engineer
Enter new address or copy one from list:	
Mailing Address	
Address Type	Domestic

Mailing Address (include Suite or Bldg. here, if applicable)	5761 UNDERWOOD RD
Routing (such as Mail Code, Dept., or Attn:)	
City	PASADENA
State	TX
ZIP	77507
Phone (###-###-####)	2258928296
Extension	
Alternate Phone (###-###-####)	
Fax (###-###-####)	
E-mail	robert.vogel@ineos.com

## Title V General Information - Existing

1) Permit Type:	SOP
2) Permit Latitude Coordinate:	29 Deg 37 Min 43 Sec
3) Permit Longitude Coordinate:	95 Deg 5 Min 10 Sec
4) Is this submittal a new application or an update to an existing application?	New Application
4.1. What type of permitting action are you applying for?	Streamlined Revision
4.1.1. Are there any permits that should be voided upon issuance of this permit application through permit conversion?	No
4.1.2. Are there any permits that should be voided upon issuance of this permit application through permit consolidation?	No
5) 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)	
[File Properties]	
File Name	<a href=/ePermitsExternal/faces/file?fileId=278445>OP_1_INEOS Title V Minor Revision 2025-0821.pdf</a>
Hash	CDEBEFAE669BC02562848CFF0E49F3D72B9C4FD9A87D7D9A089AE5792628C80F
MIME-Type	application/pdf

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

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

Attach OP-REQ2 (Negative Applicable Requirement Determinations)

Attach OP-REQ3 (Applicable Requirements Summary)

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

Attach OP-SUMR (Individual Unit Summary for Revisions)

Attach OP-MON (Monitoring Requirements)

Attach OP-UA (Unit Attribute) Forms

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

Attach OP-CRO2 (Change of Responsible Official Information)

Attach OP-DEL (Delegation of Responsible Official)

Attach any other necessary information needed to complete the permit.

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

## Expedite Title V

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

No

## Certification

I certify that I am the 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 Kevin Mcgovern, the owner of the STEERS account ER104838.
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 1373.
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: Kevin Mcgovern OWNER OPERATOR

Account Number: ER104838

Signature IP Address: 155.190.8.7

Signature Date: 2025-08-28

Signature Hash: F7925D35166504480DF83CD9D0345290F8E71BD5184B230DE7CC843A195FBC51

Form Hash Code at time of Signature: 047253EC57231726248A6BF3F776AD8D97FB9E35D6A4FF4837102AB103E97B8A

## Submission

Reference Number:

The application reference number is 812827

Submitted by:	The application was submitted by ER104838/Kevin Mcgovern
Submitted Timestamp:	The application was submitted on 2025-08-28 at 16:05:57 CDT
Submitted From:	The application was submitted from IP address 155.190.8.7
Confirmation Number:	The confirmation number is 674664
Steers Version:	The STEERS version is 6.92
Permit Number:	The permit number is 1373

## Additional Information

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Application Creator: This account was created by Robert M Vogel

**STREAMLINED MINOR REVISION  
APPLICATION**  
Site Operating Permit 01373

**INEOS AMERICAS LLC  
Bayport EO Plant  
CN602805236  
RN102926920**

**Prepared By:**

Hao Zhang – Managing Consultant  
Lillian Rodriguez - Consultant

**TRINITY CONSULTANTS**

1800 West Loop South  
Suite 1000  
Houston, TX 77027  
(713) 552-1371

August 2025

Project 254402.0375



## **TABLE OF CONTENTS**

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<b>1. PROJECT INFORMATION</b>	<b>1-1</b>
<b>2. ADMINISTRATIVE FORMS</b>	<b>2-1</b>
<b>3. UNIT ATTRIBUTE FORMS</b>	<b>3-1</b>
<b>4. APPLICABLE REQUIREMENTS SUMMARY FORMS</b>	<b>4-1</b>

## 1. PROJECT INFORMATION

---

INEOS AMERICAS LLC owns and operates an Ethylene Oxide plant (Bayport EO Plant), located in the Bayport Industrial Park at 5761 Underwood Road in Pasadena, Harris County, Texas. Facilities at the site are operated under Site Operating Permit (SOP) O1373. The Bayport EO Plant has been assigned TCEQ Air Quality Account No. HG-1996-R. The purpose of this application is to implement a minor revision to the SOP.

As part of this minor revision application, the following revisions are being requested:

- ▶ Per Compliance Schedule regarding Unit ID PAINTAREA, INEOS is submitting this Title V permit revision application to update applicable requirement of the painting and surface coating operations to comply with 30 TAC Chapter 115 requirement, including:
  - Removing existing permit shield for 30 TAC Chapter 115, Surface Coating Operations
  - Adding applicable requirement under 30 TAC Chapter 115, Surface Coating Operations
  - Removing existing exemption under 30 TAC Chapter 115, Subchapter E, Division 5
  - Including negative applicability of 30 TAC Chapter 115, Subchapter E, Division 5 for documentation purposes only
    - ◆ INEOS will request addition of permit shield for 30 TAC Chapter 115, Subchapter E, Division 5 in the next renewal/significant revision application.
- ▶ In addition, INEOS is requesting removal of the aforementioned Compliance Schedule upon approval of this permit revision application.

## **2. ADMINISTRATIVE FORMS**

---

This section contains the following forms and information:

- ▶ OP-2 – Application for Permit Revision/Renewal
- ▶ OP-SUM – Individual Unit Summary

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

Date: <b>8/21/2025</b>	
Permit No.: <b>O1373</b>	
Regulated Entity No.: <b>RN102926920</b>	
Company Name: <b>INEOS AMERICAS LLC</b>	
For Submissions to <b>EPA</b>	
Has an electronic copy of this application been submitted (or is being submitted) to EPA? <span style="float: right;"><input checked="" type="checkbox"/> YES <input type="checkbox"/> NO</span>	
<b>I. Application Type</b>	
Indicate the type of application:	
<input type="checkbox"/> Renewal	
<input checked="" type="checkbox"/> Streamlined Revision (Must include provisional terms and conditions as explained in the instructions.)	
<input type="checkbox"/> Significant Revision	
<input type="checkbox"/> Revision Requesting Prior Approval	
<input type="checkbox"/> Administrative Revision	
<input type="checkbox"/> Response to Reopening	
<b>II. Qualification Statement</b>	
For SOP Revisions Only <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**

<b>III. Major Source Pollutants (Complete this section if the permit revision is due to a change at the site or change in regulations.)</b>						
Indicate all pollutants for which the site is a major source based on the site's potential to emit: <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 type="checkbox"/> PM <sub>10</sub>	<input type="checkbox"/> CO	<input type="checkbox"/> Pb	<input checked="" type="checkbox"/> HAP
Other:						
<b>IV. Reference Only Requirements (For reference only)</b>						
Has the applicant paid emissions fees for the most recent agency fiscal year (September 1 - August 31)?						<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO <input type="checkbox"/> N/A
<b>V. Delinquent Fees and Penalties</b>						
Notice: This form will not be processed until all delinquent fees and/or penalties owed to the TCEQ or the Office of the Attorney General on behalf of the TCEQ are paid in accordance with the Delinquent Fee and penalty protocol.						

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

Date: 8/21/2025
Permit No.: O1373
Regulated Entity No.: RN102926920
Company Name: INEOS AMERICAS LLC

Using the table below, provide a description of the revision.

Revision No.	Revision Code	New Unit	Unit/Group	Process	NSR Authorization	Description of Change and Provisional Terms and Conditions
			ID No.	Applicable Form		
1	MS-C	NO	PAINTAREA	OP-REQ2	106.433/09/04/2000[113031]	Remove current permit shield for 30 TAC Chapter 115, Surface Coating Operations
2	MS-C	NO	PAINTAREA	OP-REQ3 OP-UA18	106.433/09/04/2000[113031]	Add applicable 30 TAC Chapter 115, Surface Coating Operations requirements.
3	MS-C	NO	PAINTAREA	OP-REQ3	106.433/09/04/2000[113031]	Remove §115.451(a)(3) exemption.
		NO	PAINTAREA	OP-REQ2	106.433/09/04/2000[113031]	The Bayport EO Plant is not subject to 30 TAC Chapter 115, Subchapter E, Division 5. However, INEOS is not requesting a permit shield to be added as part of this application.

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

Date:
Permit No.:
Regulated Entity No.:
Company Name:
<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:

<b>Pollutant</b>	<b>Description of the Change in Pollutant Emissions</b>



### **3. UNIT ATTRIBUTE FORMS**

---

This section contains the following Unit Attribute Forms:

- ▶ OP-UA18 – Surface Coating Operations Attributes

**Surface Coating Operations Attributes  
Form OP-UA18  
Federal Operating Permit Program  
Texas Commission on Environmental Quality**

**General Information**

Requested Information	Response
<b>Date:</b>	08/21/2025
<b>Customer Reference No.:</b>	CN602805236
<b>Regulated Entity No.:</b>	RN102926920
<b>Permit No.:</b>	O1373
<b>Permit Area Name:</b>	Bayport EO Plant
<b>Permit Type:</b>	SOP
<b>Project Type:</b>	Revision
<b>Submission Type:</b>	Existing Application Update
<b>Project Number (if available):</b>	
Form Information	TCEQ Entry Only
<b>Title V Form Release Date:</b>	11/2013
<b>Form Number:</b>	10024
<b>APD ID Number:</b>	53v1.0
<b>Version Revised Date:</b>	07/2025
	This form is for use by facilities subject to air quality permit requirements and may be revised periodically.

**Table 8a: Title 30 Texas Administrative Code Chapter 115 (30 TAC Chapter 115)  
 Subchapter E, Division 2: Surface Coating Processes**

<b>Process ID No.</b>	<b>SOP Index No.</b>	<b>Alternative Compliance Method (ACM)</b>	<b>ACM ID No.</b>	<b>Facility Operations</b>	<b>Maintenance Shop</b>	<b>VOC Emission Rate</b>	<b>Vapor Recovery</b>	<b>Control Device ID No.</b>
PAINTAREA	115E-3	NO		MISM	2012-	OTHER	NONE	

[Go to the Table of Contents](#)

**Surface Coating Operations Attributes  
Form OP-UA18  
Federal Operating Permit Program  
Texas Commission on Environmental Quality**

**Table 8b: Title 30 Texas Administrative Code Chapter 115 (30 TAC Chapter 115)  
Subchapter E, Division 2: Surface Coating Processes**

Process ID No.	SOP Index No.	Alternative Requirements (AR)	AR ID No.	Miscellaneous Coating Type	Vehicle Refinishing Coating Type	Mirror Backing	Wood Coating Type
PAINTAREA	115E-3	NO		BAKE			

[Go to the Table of Contents](#)

## **4. APPLICABLE REQUIREMENTS SUMMARY FORMS**

---

This section contains the following forms and information:

- ▶ Form OP-REQ1 – Application Area-Wide Applicability Determinations and General Information
- ▶ Form OP-REQ2 – Negative Applicable Requirements Determinations
- ▶ Form OP-REQ3 – Applicable Requirements Summary

**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.
08/21/2025	O1373	RN102926920

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):

*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
6257E	06/24/2025				
6357F	01/04/2024				
83663	09/14/2020				
157440	08/21/2019				

**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.
08/21/2025	O1373	RN102926920

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
15	05/12/1981	106.371	09/04/2000	106.478	09/04/2000
51	11/05/1986	106.373	09/04/2000	106.511	09/04/2000
53	11/05/1986	106.412	09/04/2000	106.512	06/13/2001
106.261	11/01/2003	106.433	09/04/2000	106.532	09/04/2000
106.262	11/01/2003	106.452	09/04/2000		
106.263	11/01/2001	106.454	09/04/2000		
106.264	09/04/2000	106.472	09/04/2000		
106.265	09/04/2000	106.473	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



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

**Table 1a: Additions**

<b>Date:</b> 08/21/2025	<b>Regulated Entity No.:</b> RN102926920	<b>Permit No.:</b> O1373
<b>Company Name:</b> INEOS AMERICAS LLC	<b>Area Name:</b> Bayport EO Plant	

Revision No.	Unit/Group/Process ID No.	Unit/Group/Process Applicable Form	SOP/GOP Index No	Pollutant	Applicable Regulatory Requirement Name	Applicable Regulatory Requirement Standard(s)
2	PAINTAREA	OP-UA18	115E-3	VOC	30 TAC Chapter 115, Surface Coating Operations	§115.421(8)(A) 5 [R]§115.421 [R]§115.421(8)(B) [R]§115.421(8)(C) [R]§115.426

**Applicable Requirements Summary  
Form OP-REQ3 (Page 2)  
Federal Operating Permit Program**

**Table 1b: Additions**

<b>Date: 08/21/2025</b>	<b>Regulated Entity No.: RN102926920</b>	<b>Permit No.: O1373</b>
<b>Company Name: INEOS AMERICAS LLC</b>	<b>Area Name: Bayport EO Plant</b>	

<b>Revision No.</b>	<b>Unit/Group/Process ID No.</b>	<b>SOP/GOP Index No.</b>	<b>Pollutant</b>	<b>Monitoring and Testing Requirements</b>	<b>Recordkeeping Requirements</b>	<b>Reporting Requirements</b>
2	PAINTAREA	115E-3	VOC	[R]§115.424(a) [R]§115.424(b) [GR]§115.425(1) [R]§115.425(6) [GR]§115.426(1)	[R]§115.426 [GR]§115.426(1)	NONE

**Applicable Requirements Summary  
Form OP-REQ3 (Page 3)  
Federal Operating Permit Program**

**Table 2a: Deletions**

<b>Date: 08/21/2025</b>	<b>Regulated Entity No.: RN102926920</b>	<b>Permit No.: O1373</b>
<b>Company Name: INEOS AMERICAS LLC</b>	<b>Area Name: Bayport EO Plant</b>	

<b>Revision No.</b>	<b>Unit/Group/Process ID No.</b>	<b>Unit/Group/Process Applicable Form</b>	<b>SOP/GOP Index No.</b>	<b>Pollutant</b>	<b>Applicable Regulatory Requirement Name</b>	<b>Applicable Regulatory Requirement Standard(s)</b>
3	PAINTAREA	OP-REQ3	115E-2	VOC	30 TAC Chapter 115, Subchapter E, Division 5	§ 115.451(a)(1) § 115.453(e) § 115.453(e)(1)

**Applicable Requirements Summary  
Form OP-REQ3 (Page 4)  
Federal Operating Permit Program**

**Table 2b: Deletions**

<b>Date:</b> 08/21/2025	<b>Regulated Entity No.:</b> RN102926920	<b>Permit No.:</b> O1373
<b>Company Name:</b> INEOS AMERICAS LLC		<b>Area Name:</b> Bayport EO Plant

<b>Revision No.</b>	<b>Unit/Group/Process ID No.</b>	<b>Unit/Group/Process Applicable Form</b>	<b>SOP/GOP Index No.</b>	<b>Pollutant</b>	<b>Monitoring and Testing Requirements</b>	<b>Recordkeeping Requirements</b>	<b>Reporting Requirements</b>
3	PAINTAREA	OP-REQ2	115E-2	VOC	NONE	§ 115.458(b)(1) § 115.458(b)(2) § 115.458(b)(5) § 115.458(b)(7)	§ 115.453(e)(2)

**From:** [TVAPPS](#)  
**To:** [Rosa Mora-Nichols](#)  
**Cc:** [APIRT](#)  
**Subject:** FW: STEERS / TV 38100 / 1373 - Streamline - INEOS Americas - 779066  
**Date:** Thursday, May 1, 2025 8:20:04 AM

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Sean Wheeler  
Business Support Section Process Coordinator  
Air Permits Division | TCEQ  
512-239-2253 | [Sean.Wheeler@tceq.texas.gov](mailto:Sean.Wheeler@tceq.texas.gov)

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

From: [steers@tceq.texas.gov](mailto:steers@tceq.texas.gov) <[steers@tceq.texas.gov](mailto:steers@tceq.texas.gov)>  
Sent: Wednesday, April 30, 2025 4:35 PM  
To: RFCAIR12 <[RFCAIR12@tceq.texas.gov](mailto:RFCAIR12@tceq.texas.gov)>; [air\\_permits@pcs.hctx.net](mailto:air_permits@pcs.hctx.net); [modaniel@ci.pasadena.tx.us](mailto:modaniel@ci.pasadena.tx.us); TVAPPS <[tvapps@tceq.texas.gov](mailto:tvapps@tceq.texas.gov)>  
Subject: STEERS Title V Application Submittal (New Application)

The TV-E application has been successfully submitted by KEVIN MCGOVERN. The submittal was received at 04/30/2025 04:35 PM.

The Reference number for this submittal is 779066

The confirmation number for this submittal is 650249.

The Area ID for this submittal is 1373.

The Project ID for this submittal is 38100.

The hash code for this submittal is

D1598AA5F42E5BDE63D88FA39424B352CBD30CDD64620FD0F5E9504A7A3620ED.

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

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

**(Texas Commission on Environmental Quality  
Monitoring Requirements  
Form OP-MON (Page 1)  
Federal Operating Permit Program  
Table 1a: CAM/PM Additions**

<b>I. Identifying Information</b>		
Account No.: HG-1996-R	RN No.: RN102926920	CN: CN602805236
Permit No.: O1373	Project No.: TBA	
Area Name: Bayport EO Plant		
Company Name: INEOS Americas LLC		
<b>II. Unit/Emission Point/Group/Process Information</b>		
Revision No.: 2		
Unit/EPN/Group/Process ID No.: R-1		
Applicable Form: OP-UA4		
<b>III. Applicable Regulatory Requirement</b>		
Name: 30 TAC Chapter 115, Loading and Unloading of VOC		
SOP/GOP Index No.: 115C-1		
Pollutant: VOC		
Main Standard: §115.212(a)(1)		
<b>IV. Title V Monitoring Information</b>		
Monitoring Type: PM		
Unit Size: LG		
CAM/PM Option No.: PM-V-029		
Deviation Limit: Maximum outlet gas temperature shall not exceed 86 <b>92</b> degrees F.		
CAM/PM Option No.: PM-V-030		
Deviation Limit: Minimum liquid flow rate shall not be less than <b>41.6</b> gal/min.		
<b>V. Control Device Information</b>		
Control Device ID No.: 30-6000		
Control Device Type: ABSOR2		

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

All initial issuance, revision, renewal, and reopening permit application submittals requiring certification must be addressed using this form. Updates to site operating permit (SOP) and temporary operating permit (TOP) applications, other than public notice verification materials, must be certified prior to authorization of public notice or start of public announcement. Updates to general operating permit (GOP) applications must be certified prior to receiving an authorization to operate under a GOP.

<b>I. Identifying Information</b>	
RN: RN102926920	
CN: CN602805236	
Account No.: HG-1996-R	
Permit No.: O1373	
Project No.: N/A	
Area Name: Bayport EO Plant	
Company Name: INEOS Americas LLC	
<b>II. Certification Type</b> <i>(Please mark appropriate box)</i>	
<input checked="" type="checkbox"/> Responsible Official Representative	<input type="checkbox"/> Duly Authorized Representative
<b>III. Submittal Type</b> <i>(Please mark appropriate box) (Only one response can be accepted per form)</i>	
<input type="checkbox"/> SOP/TOP Initial Permit Application	<input checked="" type="checkbox"/> Permit Revision, Renewal, or Reopening
<input type="checkbox"/> GOP Initial Permit Application	<input type="checkbox"/> Update to Permit Application
<input type="checkbox"/> Other: _____	

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

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

<b>IV. Certification of Truth</b>			
<b>This certification does not extend to information which is designated by TCEQ as information for reference only.</b>			
I, <u>Kevin McGovern</u> certify that I am the <u>RO</u>			
<i>(Certifier Name printed or typed)</i>		<i>(RO or DAR)</i>	
and that, based on information and belief formed after reasonable inquiry, the statements and information dated during the time period or on the specific date(s) below, are true, accurate, and complete: <i>Note: Enter Either a Time Period or Specific Date(s) for each certification. This section must be completed. The certification is not valid without documentation date(s).</i>			
Time Period: From _____ to _____			
<i>(Start Date)</i>		<i>(End Date)</i>	
Specific Dates: <u>4/30/2025</u> _____			
<i>(Date 1)</i>		<i>(Date 2)</i>	
<i>(Date 3)</i>		<i>(Date 4)</i>	
<i>(Date 5)</i>		<i>(Date 6)</i>	
Signature: <u>Kevin McGovern</u>		Signature Date: <u>4/30/25</u> Title: _____	
Title: <u>General Manager</u>			

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

<b>Date:</b> April 30, 2025	<b>Regulated Entity No.:</b> RN102926920	<b>Permit No.:</b> O1373
<b>Company Name:</b> INEOS Americas LLC		<b>Area Name:</b> Bayport EO Plant

- 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)	
1. 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
2. Are there any non-compliance situations addressed in the Compliance Schedule Section of this form (Part 2)?	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO
3. 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>	<p style="text-align: center;">12</p> <p style="text-align: center;"><i>Note: Five of the enclosed Part 2 attachments are deletions.</i></p>
<p>* <i>For Site Operating Permits (SOPs), the complete application should be consulted for applicable requirements and their corresponding emission units when assessing compliance status.</i>  <i>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.</i></p> <p><i>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.</i></p>	

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

<b>Date:</b> April 30, 2025	<b>Regulated Entity No.:</b> RN102926920	<b>Permit No.:</b> O1373
<b>Company Name:</b> INEOS Americas LLC		<b>Area Name:</b> Bayport EO Plant

**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): <del>TK-4703</del>		
SOP Index No.: <del>N/A</del>		
Pollutant: <del>VOC</del>		
<b>Applicable Requirement</b>		
<b>Citation</b>	<b>Text Description</b>	
<del>30 TAC §116.10 30 TAC §115.112(e) 40 CFR §63.119(a)(1)</del>	<del>Storage tanks storing material above certain vapor pressures must be controlled by a floating roof or venting through a closed vent system to a control device.</del>	
<b>2. Compliance Status Assessment Method and Records Location</b>		
<b>Citation</b>	<b>Text Description</b>	<b>Location of Records/Documentation</b>
<del>30 TAC §115.112(e) 30 TAC §63.119(a)(1)</del>	<del>Storage vessel shall be controlled by the applicable methods prescribed under 40 CFR §63.119(a)(1) and 30 TAC §115.112(e).</del>	<del>On-site</del>
<b>3. Non-compliance Situation Description</b>		
<del>Equistar cannot confirm that the storage tanks are either exempt from controls or that the current controls are compliant. The pressure control systems on certain fixed roof tanks were designed such that the pressure set points of the PCV on the outlet line from the tank to the scrubber may overlap with the pressure set points for the pressure relief devices that allow emergency venting directly to the atmosphere. Therefore, there may be times when the pressure relief device to atmosphere opens prior to the PCV to the scrubber opening resulting in the gases being diverted to the atmosphere instead of being routed to the scrubber for control. The most stringent rules should be applied until applicability is determined.</del>		
<b>4. Corrective Action Plan Description</b>		
<del>Evaluate tanks and pressure relief device settings to determine and implement necessary changes to meet control requirements.</del>		
<b>5. List of Activities/Milestones to Implement the Corrective Action Plan</b>		
<del>Complete any necessary changes by 12/31/2024 (estimated date of next scheduled turnaround).</del>		

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

<b>Date:</b> April 30, 2025	<b>Regulated Entity No.:</b> RN102926920	<b>Permit No.:</b> O1373
<b>Company Name:</b> INEOS Americas LLC		<b>Area Name:</b> Bayport EO Plant

**Part 2 (continued)**

<b>6. Previously Submitted Compliance Plan(s)</b>	
<b>Type of Action</b>	<b>Date Submitted</b>
<i>N/A</i>	
<b>7. Progress Report Submission Schedule</b>	
<i>Progress reports will be submitted every 6 calendar months starting at renewal of this FOP.</i>	

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

<b>Date:</b> April 30, 2025	<b>Regulated Entity No.:</b> RN102926920	<b>Permit No.:</b> O1373
<b>Company Name:</b> INEOS Americas LLC		<b>Area Name:</b> Bayport EO Plant

**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): <b>WASTEWATER</b>		
SOP Index No.: <i>N/A</i>		
Pollutant: <b>VOC &amp; HAP</b>		
<b>Applicable Requirement</b>		
<b>Citation</b>	<b>Text Description</b>	
<i>NSR Permit 6257E Special Condition 1 30 TAC §116.115(c)</i>	<i>SC1: Permit holder must comply with all special conditions contained in the NSR Permit including the emission rates listed in the MAERT. (c) Special conditions. The holders of permits, special permits, standard permits, and special exemptions shall comply with all special conditions contained in the permit document.</i>	
<b>2. Compliance Status Assessment Method and Records Location</b>		
<b>Citation</b>	<b>Text Description</b>	<b>Location of Records/Documentation</b>
<i>NSR Permit 6257E Special Condition 1</i>	<i>Emission increases have not been evaluated via NSR Permit, PBR, Standard Permit and Title V Permit process.</i>	<i>On-site</i>
<b>3. Non-compliance Situation Description</b>		
<i>Process wastewater streams routed to the wastewater system result in emissions higher than authorized in Permit No. 6257E. The characteristics of certain wastewater streams result in changed rule applicability of the HON and Chapter 115 industrial wastewater rules, including the need for controls on affected wastewater system components.</i>		
<b>4. Corrective Action Plan Description</b>		
<i>The site quantified process wastewater streams and applied for a permit amendment to authorize increased emissions for the wastewater system. Controls to reduce emissions will be installed as required by the NSR permit process.</i>		
<b>5. List of Activities/Milestones to Implement the Corrective Action Plan</b>		
<i>Submitted an amendment application for NSR Permit 6257E on 06/30/2022.</i>		
<i>NSR 6257E Permit Amendment was issued on 6/14/2023 (TCEQ Project Number 343829).</i>		
<b><i>Install controls by 9/30/2025.</i></b>		

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

<b>Date:</b> April 30, 2025	<b>Regulated Entity No.:</b> RN102926920	<b>Permit No.:</b> O1373
<b>Company Name:</b> INEOS Americas LLC		<b>Area Name:</b> Bayport EO Plant

**Part 2 (continued)**

*Submit a Title V revision application to update 40 CFR Part 63, Subpart G and 30 TAC Chapter 115, Industrial Wastewater applicability, if necessary, no later than six months after installation of the controls authorized by NSR Permit 6257E amendment (TCEQ Project Number 343829.)*

<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>	
<i>The periodic progress report with updates communicated to TCEQ on the DOV status, will constitute meeting this requirement.</i>	

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

<b>Date:</b> April 30, 2025	<b>Regulated Entity No.:</b> RN102926920	<b>Permit No.:</b> O1373
<b>Company Name:</b> INEOS Americas LLC		<b>Area Name:</b> Bayport EO Plant

**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): <i>WASTEWATER</i>		
SOP Index No.: <i>N/A</i>		
Pollutant: <i>VOC &amp; HAP</i>		
<b>Applicable Requirement</b>		
<b>Citation</b>	<b>Text Description</b>	
<i>40 CFR Subpart A §63.9 40 CFR Subpart G § 63.132, § 63.136; §§ 63.138-.149; § 63.152 30 TAC §§ 115.142-149</i>	<i>63.132 (a) Existing sources. This paragraph specifies the requirements applicable to process wastewater streams located at existing sources. The owner or operator shall comply with the requirements in paragraphs (a)(1) through (a)(3) of this section, no later than the applicable dates specified in § 63.100 of subpart F of this part.</i>	
<b>2. Compliance Status Assessment Method and Records Location</b>		
<b>Citation</b>	<b>Text Description</b>	<b>Location of Records/Documentation</b>
<i>40 CFR Subpart G § 63.132, § 63.136; § 63.138-.149; § 63.152 30 TAC §§ 115.142-149</i>	<i>Site is not showing compliance with applicable HON and Chapter 115 requirements at this location.</i>	<i>On-site</i>
<b>3. Non-compliance Situation Description</b>		
<i>The "Force Main," which is part of the wastewater system Group 1 wastewater control system, has been incorrectly classified as a junction box. In addition, the Force Main no longer operates with only slight fluctuations to the liquid flow. Further, Equistar cannot demonstrate that the water seal at the exit of the Force Main is being maintained to restrict ventilation in the individual drain system and between components in the individual drain system.</i>		
<b>4. Corrective Action Plan Description</b>		
<i>The site will take measures to bring the Force Main into compliance with applicable HON and Chapter 115 requirements, as part of the controls to reduce emissions from the Bayport wastewater system.</i>		
<b>5. List of Activities/Milestones to Implement the Corrective Action Plan</b>		
<i>The site will take measures to bring the Force Main into compliance with applicable HON and Chapter 115 requirements as part of the project to reduce emissions from the wastewater system by <b>9/30/2025</b>.</i>		

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

<b>Date:</b> April 30, 2025	<b>Regulated Entity No.:</b> RN102926920	<b>Permit No.:</b> O1373
<b>Company Name:</b> INEOS Americas LLC		<b>Area Name:</b> Bayport EO Plant

**Part 2 (continued)**

<b>6. Previously Submitted Compliance Plan(s)</b>	
<b>Type of Action</b>	<b>Date Submitted</b>
<i>N/A</i>	
<b>7. Progress Report Submission Schedule</b>	
<i>The periodic progress report with updates communicated to TCEQ on the DOV status, will constitute meeting this requirement.</i>	

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

<b>Date:</b> April 30, 2025	<b>Regulated Entity No.:</b> RN102926920	<b>Permit No.:</b> O1373
<b>Company Name:</b> INEOS Americas LLC		<b>Area Name:</b> Bayport EO Plant

**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): <del>WASTEWATER</del>		
SOP Index No.: <del>N/A</del>		
Pollutant: <del>VOC &amp; HAP</del>		
<b>Applicable Requirement</b>		
<b>Citation</b>	<b>Text Description</b>	
<del>30 TAC § 116.110(a)</del>	<del>All emissions must be authorized via NSR Permit, PBR, Standard Permit and Title V Permit before construction/operation.</del>	
<b>2. Compliance Status Assessment Method and Records Location</b>		
<b>Citation</b>	<b>Text Description</b>	<b>Location of Records/Documentation</b>
<del>§30 TAC § 116.110(a) 40 CFR Subpart G § 63.132, § 63.134, § 63.136, § 63.138-149 40 CFR Subpart G § 63.152</del>	<del>Emissions have not been evaluated via NSR Permit, PBR, Standard</del>	<del>On-site</del>
<b>3. Non-compliance Situation Description</b>		
<del>The wastewater treatment system utilizes an overflow pond that has no authorized air emissions. The overflow pond has been considered exempt from Chapter 115 and HON wastewater requirements; however, the presence of normal-operation wastewater in the overflow pond means the pond is subject to both Chapter 115 industrial wastewater rule and HON requirements.</del>		
<b>4. Corrective Action Plan Description</b>		
<del>The site quantified unauthorized emissions from the overflow pond and applied for a permit amendment to authorize these emissions for the wastewater system. Controls to reduce emissions will be installed as required by the NSR permit process.</del>		
<b>5. List of Activities/Milestones to Implement the Corrective Action Plan</b>		
<del>Mitigate normal-operation wastewater from entering the overflow pond, expected by 12/31/2024.</del>		

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

<b>Date:</b> April 30, 2025	<b>Regulated Entity No.:</b> RN102926920	<b>Permit No.:</b> O1373
<b>Company Name:</b> INEOS Americas LLC		<b>Area Name:</b> Bayport EO Plant

**Part 2 (continued)**

<b>6. Previously Submitted Compliance Plan(s)</b>	
<b>Type of Action</b>	<b>Date Submitted</b>
<i>N/A</i>	
<b>7. Progress Report Submission Schedule</b>	
<i>The periodic progress report with updates communicated to TCEQ on the DOV status, will constitute meeting this requirement.</i>	

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

<b>Date:</b> April 30, 2025	<b>Regulated Entity No.:</b> RN102926920	<b>Permit No.:</b> O1373
<b>Company Name:</b> INEOS Americas LLC		<b>Area Name:</b> Bayport EO Plant

**Part 2**

<b>A. Compliance Schedule</b>		
<p>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.</p>		
<b>1. Specific Non-Compliance Situation</b>		
Unit/Group/Process ID No.(s): <i>WASTEWATER</i>		
SOP Index No.: <i>N/A</i>		
Pollutant: <i>VOC &amp; HAP</i>		
<b>Applicable Requirement</b>		
<b>Citation</b>	<b>Text Description</b>	
<i>NSR Permit 83663 Special Condition 1 NSR Permit 6257E Special Condition 1 30 TAC § 116.115(c)</i>	<i>SC1: Permit holder must comply with all special conditions contained in the NSR Permit including the emission rates listed in the MAERT.  (c) Special conditions. The holders of permits, special permits, standard permits, and special exemptions shall comply with all special conditions contained in the permit document.</i>	
<b>2. Compliance Status Assessment Method and Records Location</b>		
<b>Citation</b>	<b>Text Description</b>	<b>Location of Records/Documentation</b>
<i>NSR Permit 83663 Special Condition 1 NSR Permit 6257E Special Condition 1</i>	<i>Emissions have not been evaluated via NSR Permit, PBR, Standard Permit and Title V Permit process.</i>	<i>On-site</i>
<b>3. Non-compliance Situation Description</b>		
<i>Emissions associated with maintenance, startup, and shutdown (MSS) and campaign change activities are not properly authorized in the existing authorization for emissions from the wastewater system in either Permit No.83663 or 6257E. Additional MSS and campaign change activity contributions to wastewater streams result in changed rule applicability of the HON and Chapter 115 industrial wastewater rules, including the need for control requirements on affected wastewater system components.</i>		
<b>4. Corrective Action Plan Description</b>		
<i>The site quantified MSS and campaign change activities and applied for a permit amendment to authorize increased emissions for the wastewater system. Controls to reduce emissions will be installed as required by the NSR permit process.</i>		
<b>5. List of Activities/Milestones to Implement the Corrective Action Plan</b>		
<i>Submitted an amendment application for NSR Permit 6257E on 06/30/2022.</i>		
<i>NSR 6257E Permit Amendment was issued on 6/14/2023 (TCEQ Project Number 343829).</i>		

**Part 2**

**A. Compliance Schedule**

~~Install controls authorized via NSR Permit 6257E amendment, expected by 12/31/2024.~~ **Install controls by 9/30/2025.**

Submit a Title V revision application to update 40 CFR Part 63, Subpart G and 30 TAC Chapter 115, Industrial Wastewater applicability, if necessary, no later than six months after installation of the controls authorized by NSR Permit 6257E amendment (TCEQ Project Number 343829).

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

<b>Date:</b> April 30, 2025	<b>Regulated Entity No.:</b> RN102926920	<b>Permit No.:</b> O1373
<b>Company Name:</b> INEOS Americas LLC		<b>Area Name:</b> Bayport EO Plant

**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>	
<i>The periodic progress report with updates communicated to TCEQ on the DOV status, will constitute meeting this requirement.</i>	

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

<b>Date:</b> April 30, 2025	<b>Regulated Entity No.:</b> RN102926920	<b>Permit No.:</b> O1373
<b>Company Name:</b> INEOS Americas LLC		<b>Area Name:</b> Bayport EO Plant

**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): <i>WASTEWATER</i>		
SOP Index No.: <i>N/A</i>		
Pollutant: <i>VOC &amp; HAP</i>		
<b>Applicable Requirement</b>		
<b>Citation Text Description</b>	<b>Citation Text Description</b>	
<i>NSR Permit 83663 Special Condition 7 30 TAC § 116.115(c)</i>	<i>Permit holder must comply with all special conditions contained in the NSR Permit including the emission rates listed in the MAERT. (c) Special conditions. The holders of permits, special permits, standard permits, and special exemptions shall comply with all special conditions contained in the permit document.</i>	
<b>2. Compliance Status Assessment Method and Records Location</b>		
<b>Citation</b>	<b>Text Description</b>	<b>Location of Records/Documentation</b>
<i>NSR Permit 83663 Special Condition 7</i>	<i>Site operation not meeting Special Condition 7 for all applicable streams.</i>	<i>On-site</i>
<b>3. Non-compliance Situation Description</b>		
<i>MSS and campaign change activities are not being conducted in compliance with the requirements of Special Condition 7 in Permit 83663.</i>		
<b>4. Corrective Action Plan Description</b>		
<i>Measures will be taken to meet the MSS and campaign change requirements of Special Condition 7 in Permit 83663, such as installing hard-piping, routing to control, and/or operational procedure change.</i>		
<b>5. List of Activities/Milestones to Implement the Corrective Action Plan</b>		
<i>Measures will be taken to meet the MSS and campaign change requirements of Special Condition 7 in Permit 83663, by <del>12/31/2024</del> <b>9/30/2025</b>.</i>		

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

<b>Date:</b> April 30, 2025	<b>Regulated Entity No.:</b> RN102926920	<b>Permit No.:</b> O1373
<b>Company Name:</b> INEOS Americas LLC		<b>Area Name:</b> Bayport EO Plant

**Part 2 (continued)**

<b>6. Previously Submitted Compliance Plan(s)</b>	
<b>Type of Action</b>	<b>Date Submitted</b>
<i>N/A</i>	
<b>7. Progress Report Submission Schedule</b>	
<i>The periodic progress report with updates communicated to TCEQ on the DOV status, will constitute meeting this requirement.</i>	

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

<b>Date:</b> April 30, 2025	<b>Regulated Entity No.:</b> RN102926920	<b>Permit No.:</b> O1373
<b>Company Name:</b> INEOS Americas LLC		<b>Area Name:</b> Bayport EO Plant

**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): <i>WASTEWATER</i>		
SOP Index No.: <i>N/A</i>		
Pollutant: <i>VOC &amp; HAP</i>		
<b>Applicable Requirement</b>		
<b>Citation</b>	<b>Text Description</b>	
<i>NSR Permit 6257E Special Condition 1 30 TAC 116.115(c)</i>	<i>SC1: Permit holder must comply with all special conditions contained in the NSR Permit including the emission rates listed in the MAERT. (c) Special conditions. The holders of permits, special permits, standard permits, and special exemptions shall comply with all special conditions contained in the permit document.</i>	
<b>2. Compliance Status Assessment Method and Records Location</b>		
<b>Citation</b>	<b>Text Description</b>	<b>Location of Records/Documentation</b>
<i>NSR Permit 6257E Special Condition 1</i>	<i>Emission have not been evaluated via NSR Permit, PBR, Standard Permit and Title V Permit process.</i>	<i>On-site</i>
<b>3. Non-compliance Situation Description</b>		
<i>A vent from the EOD condensate system that is routed to the wastewater sump contains ethylene oxide (EO) and other VOC emissions that exceed the current permit representations for EPN: UAD/PWW.</i>		
<b>4. Corrective Action Plan Description</b>		
<i>The site applied for a permit amendment to authorize increased emissions for the wastewater system. Controls to reduce emissions will be installed as required by the NSR permit process and applicable provisions of a compliance agreement dated 10/28/2021 and signed on 11/5/2021, as part of Investigation No. 1552706.</i>		
<b>5. List of Activities/Milestones to Implement the Corrective Action Plan</b>		
<i>Submitted an amendment application for NSR Permit 6257E on 06/30/2022.</i>		
<i>NSR 6257E Permit Amendment was issued on 6/14/2023 (TCEQ Project Number 343829).</i>		
<i>Install controls by <del>12/31/2024</del> <b>9/30/2025</b>.</i>		

**Part 2**

**A. Compliance Schedule**

*Submit a Title V revision application to update 40 CFR Part 63, Subpart G and 30 TAC Chapter 115, Industrial Wastewater applicability, if necessary, no later than six months after installation of the controls authorized by NSR Permit 6257E amendment (TCEQ Project Number 343829).*

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

<b>Date:</b> April 30, 2025	<b>Regulated Entity No.:</b> RN102926920	<b>Permit No.:</b> O1373
<b>Company Name:</b> INEOS Americas LLC		<b>Area Name:</b> Bayport EO Plant

**Part 2 (continued)**

<b>6. Previously Submitted Compliance Plan(s)</b>	
<b>Type of Action</b>	<b>Date Submitted</b>
<i>N/A</i>	
<b>7. Progress Report Submission Schedule</b>	
<i>The periodic progress report with updates communicated to TCEQ on the DOV status, will constitute meeting this requirement.</i>	

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

<b>Date:</b> April 30, 2025	<b>Regulated Entity No.:</b> RN102926920	<b>Permit No.:</b> O1373
<b>Company Name:</b> INEOS Americas LLC		<b>Area Name:</b> Bayport EO Plant

**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): <del>EOFUG</del>		
SOP Index No.: <del>H5D-1</del>		
Pollutant: <del>VOC</del>		
<b>Applicable Requirement</b>		
<b>Citation</b>	<b>Text Description</b>	
<del>NSR Permit 6257E-Special Condition 1 30 TAC 115.352(4)</del>	<del>SCI: Permit holder must comply with all special conditions contained in the NSR Permit including the emission rates listed in the MAERT.  (e) Special conditions. The holders of permits, special permits, standard permits, and special exemptions shall comply with all special conditions contained in the permit document.</del>	
<b>2. Compliance Status Assessment Method and Records Location</b>		
<b>Citation</b>	<b>Text Description</b>	<b>Location of Records/Documentation</b>
<del>NSR Permit 6257E-Special Condition 1</del>	<del>Emission have not been evaluated via NSR Permit, PBR, Standard Permit and Title V Permit process.</del>	<del>On-site</del>
<b>3. Non-compliance Situation Description</b>		
<del>Four uncapped open ended lines (OELs) were found on a chemical injection system.</del>		
<b>4. Corrective Action Plan Description</b>		
<del>A project will be implemented to modify the piping on the chemical injection system to eliminate the four OELs during the 2024 Turnaround.</del>		
<b>5. List of Activities/Milestones to Implement the Corrective Action Plan</b>		
<del>Modification of piping on the chemical injection system to eliminate the four open ended lines, expected by 12/31/2024.</del>		

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

<b>Date:</b> April 30, 2025	<b>Regulated Entity No.:</b> RN102926920	<b>Permit No.:</b> O1373
<b>Company Name:</b> INEOS Americas LLC		<b>Area Name:</b> Bayport EO Plant

**Part 2 (continued)**

<b>6. Previously Submitted Compliance Plan(s)</b>	
<b>Type of Action</b>	<b>Date Submitted</b>
<i>N/A</i>	
<b>7. Progress Report Submission Schedule</b>	
<i>Progress reports will be submitted every six calendar months starting at the effective date of this FOP.</i>	

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

<b>Date:</b> April 30, 2025	<b>Regulated Entity No.:</b> RN102926920	<b>Permit No.:</b> O1373
<b>Company Name:</b> INEOS Americas LLC		<b>Area Name:</b> Bayport EO Plant

**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): <del>P-3, P-15, P-25</del>		
SOP Index No.: <del>N/A</del>		
Pollutant: <del>HAP</del>		
<b>Applicable Requirement</b>		
<b>Citation</b>	<b>Text Description</b>	
<del><i>Federal Operating Permit O1373 Special Condition 1 NSR Permit 6257E Special Condition 1;</i></del>	<del><i>SC1: Permit holder must comply with all special conditions contained in the NSR Permit including the emission rates listed in the MAERT. (c) Special conditions. The holders of permits, special permits, standard permits, and special exemptions shall comply with all special conditions contained in the permit document.</i></del>	
<b>2. Compliance Status Assessment Method and Records Location</b>		
<b>Citation</b>	<b>Text Description</b>	<b>Location of Records/Documentation</b>
<del><i>NSR Permit 6257E Special Condition 1</i></del>	<del><i>Emission have not been evaluated via NSR Permit, PBR, Standard Permit and Title V Permit process.</i></del>	<del><i>On-site</i></del>
<b>3. Non-compliance Situation Description</b>		
<del><i>Emissions associated with addition of a moderator to the ethylene oxide reactor and ancillary equipment systems are not properly authorized in the existing authorization for emissions in Permit 6257E.</i></del>		
<b>4. Corrective Action Plan Description</b>		
<del><i>The site will apply for a permit authorization to include the emissions associated with the moderator addition to the ethylene reactor and ancillary equipment systems. If required by the NSR permit process and applicable regulations, install controls to reduce emissions. The corrective actions will be completed in accordance with the schedule in the DOV submitted to the TCEQ.</i></del>		
<b>5. List of Activities/Milestones to Implement the Corrective Action Plan</b>		
<del><i>Apply for a permit authorization to include the emissions associated with the moderator addition to the ethylene reactor and ancillary equipment systems with submittal target of 11/30/2023.</i></del>		

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

<b>Date:</b> April 30, 2025	<b>Regulated Entity No.:</b> RN102926920	<b>Permit No.:</b> O1373
<b>Company Name:</b> INEOS Americas LLC		<b>Area Name:</b> Bayport EO Plant

**Part 2 (continued)**

<b>6. Previously Submitted Compliance Plan(s)</b>	
<b>Type of Action</b>	<b>Date Submitted</b>
<i>N/A</i>	
<b>7. Progress Report Submission Schedule</b>	
<i>The periodic progress report with updates communicated to TCEQ on the DOV status, will constitute meeting this requirement.</i>	

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

<b>Date:</b> April 30, 2025	<b>Regulated Entity No.:</b> RN102926920	<b>Permit No.:</b> O1373
<b>Company Name:</b> INEOS Americas LLC		<b>Area Name:</b> Bayport EO Plant

**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): <i>P-3, P-4, P-5, P-6, P-10, P-102</i>		
SOP Index No.: <i>N/A</i>		
Pollutant: <i>VOC, HAP</i>		
<b>Applicable Requirement</b>		
<b>Citation</b>	<b>Text Description</b>	
<i>Federal Operating Permit O1373 Special Condition 1</i>	<i>SCI: A. Emission units (including groups and processes) in the Applicable Requirements Summary attachment shall meet the limitations, standards, equipment specifications, monitoring, recordkeeping, reporting, testing, and other requirements listed in the Applicable Requirements Summary attachment to assure compliance with the permit.</i>	
<b>2. Compliance Status Assessment Method and Records Location</b>		
<b>Citation</b>	<b>Text Description</b>	<b>Location of Records/Documentation</b>
<i>Federal Operating Permit O1373 Special Condition 1</i>	<i>Site lacks sufficient documentation to verify that all regulatory applicability and associated requirements are included in Title V permit O1373 for the noted process vents.</i>	<i>On-site</i>
<b>3. Non-compliance Situation Description</b>		
<i>Site lacks sufficient documentation to verify that all regulatory applicability and associated requirements are included in Title V permit O1373 for the following process vents: P-3 (CO2 Stripper), P-4 (Ethylene Oxide Vent Absorber), P-5 (Ethylene Glycol Dehydration System Vacuum Vent Condenser), P-6 (Monoethylene Glycol Column Vacuum Vent Condenser), P-10 (Glycol Recovery Vacuum Vent Condenser), P-102 (Ethanolamine Refinery Vacuum System After Condenser).</i>		
<b>4. Corrective Action Plan Description</b>		
<i>The site will conduct compliance testing to evaluate regulatory applicability. Title V permit and NSR permit amendments will be submitted as needed for any regulatory and emission representation updates.</i>		
<b>5. List of Activities/Milestones to Implement the Corrective Action Plan</b>		

**Part 2**

**A. Compliance Schedule**

~~Complete compliance testing of process vents P-3, P-4, and P-102 prior to the 2024 site turnaround in order to assess regulatory applicability by 1/27/2024.~~ **The compliance testing of process vents P-3, P-4, and P-102 has been completed.**

~~Complete compliance testing of process vents P-5, P-6, and P-10 after the 2024 plantwide turnaround in order to complete testing at sufficient emission rate conditions. Compliance testing to be completed by 8/30/2024.~~ **The compliance testing of process vents P-5, P-6, and P-10 has been completed. The test results indicated that P-6 process vent emissions exceeded the current NSR permit allowable. Pursuant to 63.100(k)(11), the process vents must come into compliance with the new HON rule by July 15, 2026 or by any approved extension dates. Implementation of the plan for HON compliance will include the completion, submittal, and approval of a permit amendment as well as the construction of the project to route the process vents to the RTOs for control.**

~~As needed, submit Title V permit amendment with resolved regulatory applicability and NSR Permit amendment application for any needed emission representation updates by 10/15/2024.~~

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

<b>Date:</b> April 30, 2025	<b>Regulated Entity No.:</b> RN102926920	<b>Permit No.:</b> O1373
<b>Company Name:</b> INEOS Americas LLC		<b>Area Name:</b> Bayport EO Plant

**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	

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

<b>Date:</b> April 30, 2025	<b>Regulated Entity No.:</b> RN102926920	<b>Permit No.:</b> O1373
<b>Company Name:</b> INEOS Americas LLC		<b>Area Name:</b> Bayport EO Plant

**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): <i>PAINTAREA</i>		
SOP Index No.: <i>115E-2</i>		
Pollutant: <i>VOC</i>		
<b>Applicable Requirement</b>		
<b>Citation</b>	<b>Text Description</b>	
<i>30 TAC 115.451(a)(3) 30 TAC 115.453(e)</i>	<i>Surface coating processes on a property where total coating and solvent usage does not exceed 150 gallons in any consecutive 12-month period are exempt from the VOC limits in §115.453(a) of this title.</i>	
<b>2. Compliance Status Assessment Method and Records Location</b>		
<b>Citation</b>	<b>Text Description</b>	<b>Location of Records/Documentation</b>
<i>§115.458(b)</i>	<i>(3) As an alternative to the recordkeeping requirements of paragraph (2) of this subsection, the owner or operator that qualifies for exemption under §115.451(a)(3) of this title (relating to Exemptions) may maintain records of the total gallons of coating and solvent used in each month and total gallons of coating and solvent used in the previous 12 months.</i>	<i>On-site</i>
<b>3. Non-compliance Situation Description</b>		
<i>Preliminary review of the surface coating/solvent usage records indicates that the 115.451(a)(3) exemption restriction may not have been continuously met and site cannot currently confirm compliance with 30 TAC 115.453(a).</i>		
<b>4. Corrective Action Plan Description</b>		
<i>An evaluation of the surface coating/solvent usage status will be performed. Based on the results of the evaluation, corrective action(s) will be developed and implemented to ensure compliance with the applicable regulations. A Title V permit update will be submitted if needed to reflect the appropriate regulatory applicability and requirements.</i>		
<b>5. List of Activities/Milestones to Implement the Corrective Action Plan</b>		
<i>Evaluate site surface coating/solvent usage to determine compliance status by 2/28/2025. Evaluation of site surface coating/solvent usage completed and determine that the site complies with PBR limits but not the control and</i>		

**Part 2**

**A. Compliance Schedule**

**recordkeeping requirements.**

*Develop and implement needed correction action(s) to meet applicable requirements by 8/31/2025.*

*Submit Title V Permit update if needed by 8/31/2025.*

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

<b>Date:</b> April 30, 2025	<b>Regulated Entity No.:</b> RN102926920	<b>Permit No.:</b> O1373
<b>Company Name:</b> INEOS Americas LLC		<b>Area Name:</b> Bayport EO Plant

**Part 2 (continued)**

<b>6. Previously Submitted Compliance Plan(s)</b>	
<b>Type of Action</b>	<b>Date Submitted</b>
<i>N/A</i>	<i>N/A</i>
<b>7. Progress Report Submission Schedule</b>	
<i>Progress reports will be submitted every six calendar months starting at the effective date of this FOP.</i>	

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

<b>Date:</b> April 30, 2025	<b>Regulated Entity No.:</b> RN102926920	<b>Permit No.:</b> O1373
<b>Company Name:</b> INEOS Americas LLC		<b>Area Name:</b> Bayport EO Plant

**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): <del>N/A</del>		
SOP Index No.: <del>N/A</del>		
Pollutant: <del>VOC</del>		
<b>Applicable Requirement</b>		
<b>Citation</b>	<b>Text Description</b>	
<del>30 TAC §116.110 NSR Permit 6257F Special Condition 1</del>	<del>Permit holder must comply with all special conditions contained in the NSR Permit including the emission rates listed in the MAERT.</del>	
<b>2. Compliance Status Assessment Method and Records Location</b>		
<b>Citation</b>	<b>Text Description</b>	<b>Location of Records/Documentation</b>
<del>NSR Permit 6257F Special Condition 1</del>	<del>Unauthorized emissions are ongoing from leak.</del>	<del>On-site</del>
<b>3. Non-compliance Situation Description</b>		
<del>A recordable emissions event occurred when a leak developed on a line at the raw materials scrubber resulting in the release of emissions to the atmosphere.</del>		
<b>4. Corrective Action Plan Description</b>		
<del>A temporary clamp was installed on the line to minimize the leak. Permanent repairs will be made to the line to stop the leak during the 2024 site turnaround.</del>		
<b>5. List of Activities/Milestones to Implement the Corrective Action Plan</b>		
<del>Permanent repairs will be made no later than during the planned turnaround (plant outage) in 2024.</del>		

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

<b>Date:</b> April 30, 2025	<b>Regulated Entity No.:</b> RN102926920	<b>Permit No.:</b> O1373
<b>Company Name:</b> INEOS Americas LLC		<b>Area Name:</b> Bayport EO Plant

**Part 2 (continued)**

<b>6. Previously Submitted Compliance Plan(s)</b>	
<b>Type of Action</b>	<b>Date Submitted</b>
<i>N/A</i>	
<b>7. Progress Report Submission Schedule</b>	
<i>Progress reports will be submitted every six calendar months starting at the effective date of this FOP.</i>	

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

Date:04/30/2025	
Permit No.: O1373	
Regulated Entity No.: RN102926920	
Company Name: INEOS Americas LLC	
For Submissions to EPA	
Has an electronic copy of this application been submitted (or is being submitted) to EPA? <span style="float: right;"><input checked="" type="checkbox"/> YES <input type="checkbox"/> NO</span>	
<b>I. Application Type</b>	
Indicate the type of application:	
<input type="checkbox"/> Renewal	
<input checked="" type="checkbox"/> Streamlined Revision (Must include provisional terms and conditions as explained in the instructions.)	
<input type="checkbox"/> Significant Revision	
<input type="checkbox"/> Revision Requesting Prior Approval	
<input type="checkbox"/> Administrative Revision	
<input type="checkbox"/> Response to Reopening	
<b>II. Qualification Statement</b>	
For SOP Revisions Only	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO
For GOP Revisions Only	<input type="checkbox"/> YES <input type="checkbox"/> NO

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

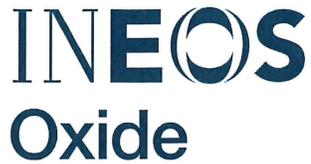
<b>III. Major Source Pollutants (Complete this section if the permit revision is due to a change at the site or change in regulations.)</b>
Indicate all pollutants for which the site is a major source based on the site's potential to emit: (Check the appropriate box[es].)
<input checked="" type="checkbox"/> VOC <input checked="" type="checkbox"/> NO <sub>x</sub> <input type="checkbox"/> SO <sub>2</sub> <input type="checkbox"/> PM <sub>10</sub> <input type="checkbox"/> CO <input type="checkbox"/> Pb <input checked="" type="checkbox"/> HAP
Other:
<b>IV. Reference Only Requirements (For reference only)</b>
Has the applicant paid emissions fees for the most recent agency fiscal year (September 1 - August 31)? <span style="float: right;"><input checked="" type="checkbox"/> YES <input type="checkbox"/> NO <input type="checkbox"/> N/A</span>
<b>V. Delinquent Fees and Penalties</b>
Notice: This form will not be processed until all delinquent fees and/or penalties owed to the TCEQ or the Office of the Attorney General on behalf of the TCEQ are paid in accordance with the Delinquent Fee and penalty protocol.

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

Date:04/30/2025
Permit No.: O1373
Regulated Entity No.: RN102926920
Company Name: INEOS Americas LLC

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	R-1	OP-UA4	N/A	Updating deviation limit on OP-MON (Periodic Monitoring) of Control Device ID No. 30-6000 to reflect results of latest performance test. Maximum outlet gas temperature is being changed from previous limit of 86 degrees F to 92 degrees F.
2	MS-C	NO	(see Form OP-ACPS)	N/A	N/A	Updating the Compliance Schedule by submitting Form OP-ACPS showing those compliance items that have been completed (shown as strikethroughs throughout entire form) as well as updates to items that are still being completed (shown as strikethroughs with new information highlighted in blue).



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Fax +1 281 474 0456

April 30, 2025

**STEERS SUBMISSION (Reference # 779066)**

Air Permits Initial Review Team (APIRT) – MC 161  
Office of Permitting, Remediation, and Registration  
Texas Commission on Environmental Quality  
P.O. Box 13087  
Austin, TX 78711-3087

**Re: Title V Operating Permit No. O1373 Minor Revision Application**

INEOS Americas LLC  
Bayport EO Plant  
Pasadena, Harris County  
TCEQ Air Account Number HG-1996-R  
Regulated Entity Number RN102926920  
Customer Number CN602805236

Dear APIRT:

INEOS Americas LLC (INEOS) respectfully submits the attached Title V Minor Revision Application Permit No. O1373. This streamlined revision seeks to update the following:

- The deviation limit on the Periodic Monitoring for ID No. R-1 is being updated based on the results of the latest performance test on the control device.
- The Compliance Schedule in the permit is being updated to the latest compliance status that reflects the most recent communications and agreements with the TCEQ Enforcement Division.

Forms OP-2, OP-MON, and OP-ACPS are being submitted as part of this revision to Permit No. O1373. Form OP-CRO1 is also attached, although the application will be certified in STEERS.

If you have any questions about this streamlined revision application, please contact Ms. Carlisa Navy, Environmental Engineer, at 281-474-0727 or via email at [carlisa.navy@ineos.com](mailto:carlisa.navy@ineos.com).

Sincerely,

A handwritten signature in black ink that reads "Kevin McGovern".

Kevin McGovern  
General Manager

Cc:

Environmental Protection Agency, Region VI Administrator

*Electronic submittal to R6AirPermitsTX@EPA.gov*

Chief Health Inspector

City of Pasadena Health Department

P.O. Box 672

Pasadena, TX 77501-0672

Air Section Manager

TCEQ Region 12

5425 Polk Avenue, Suite H

Houston, TX 77023-1452

Director

Harris County Pollution Control Services

101 S Richey St., Suite H

Pasadena, TX 77506-1023

## Texas Commission on Environmental Quality

Title V Existing

1373

### Site Information (Regulated Entity)

What is the name of the permit area to be authorized?	BAYPORT EO PLANT
Does the site have a physical address?	Yes
Physical Address	
Number and Street	5761 UNDERWOOD RD
City	PASADENA
State	TX
ZIP	77507
County	HARRIS
Latitude (N) (##.#####)	29.628611
Longitude (W) (-###.#####)	95.086111
Primary SIC Code	2860
Secondary SIC Code	
Primary NAICS Code	325199
Secondary NAICS Code	
Regulated Entity Site Information	
What is the Regulated Entity's Number (RN)?	RN102926920
What is the name of the Regulated Entity (RE)?	BAYPORT EO PLANT
Does the RE site have a physical address?	Yes
Physical Address	
Number and Street	5761 UNDERWOOD RD
City	PASADENA
State	TX
ZIP	77507
County	HARRIS
Latitude (N) (##.#####)	29.634722
Longitude (W) (-###.#####)	-95.086111
Facility NAICS Code	
What is the primary business of this entity?	INDUSTRIAL CHEMICAL MANUFACTURING PLANT

## Customer (Applicant) Information

How is this applicant associated with this site?	Owner Operator
What is the applicant's Customer Number (CN)?	CN602805236
Type of Customer	Corporation
Full legal name of the applicant:	
Legal Name	INEOS Americas LLC
Texas SOS Filing Number	800318204
Federal Tax ID	721383712
State Franchise Tax ID	17213837127
State Sales Tax ID	
Local Tax ID	
DUNS Number	9356563
Number of Employees	501+
Independently Owned and Operated?	Yes

## Responsible Official Contact

Person TCEQ should contact for questions about this application:	
Organization Name	INEOS USA LLC
Prefix	MR
First	KEVIN
Middle	
Last	MCGOVERN
Suffix	
Credentials	
Title	SITE MANAGER
Enter new address or copy one from list:	
Mailing Address	
Address Type	Domestic
Mailing Address (include Suite or Bldg. here, if applicable)	5761 UNDERWOOD RD
Routing (such as Mail Code, Dept., or Attn:)	
City	PASADENA
State	TX
ZIP	77507

Phone (###-###-####)	2815354228
Extension	
Alternate Phone (###-###-####)	
Fax (###-###-####)	
E-mail	kevin.mcgovern@ineos.com

## Technical Contact

Person TCEQ should contact for questions about this application:

Select existing TC contact or enter a new contact.

Organization Name	New Contact
Prefix	INEOS Americas LLC
First	MS
Middle	Carlisa
Last	C
Suffix	Navy
Credentials	
Title	Environmental Engineer
Enter new address or copy one from list:	Site Physical Address
Mailing Address	
Address Type	Domestic
Mailing Address (include Suite or Bldg. here, if applicable)	5761 UNDERWOOD RD
Routing (such as Mail Code, Dept., or Attn:)	
City	PASADENA
State	TX
ZIP	77507
Phone (###-###-####)	2814740727
Extension	
Alternate Phone (###-###-####)	
Fax (###-###-####)	
E-mail	carlisa.navy@ineos.com

## Title V General Information - Existing

1) Permit Type:	SOP
2) Permit Latitude Coordinate:	29 Deg 37 Min 43 Sec

- 3) Permit Longitude Coordinate: 95 Deg 5 Min 10 Sec
- 4) Is this submittal a new application or an update to an existing application? New Application
- 4.1. What type of permitting action are you applying for? Streamlined Revision
- 4.1.1. Are there any permits that should be voided upon issuance of this permit application through permit conversion? No
- 4.1.2. Are there any permits that should be voided upon issuance of this permit application through permit consolidation? No
- 5) Does this application include Acid Rain Program or Cross-State Air Pollution Rule requirements? No

### Title V Attachments Existing

Attach OP-1 (Site Information Summary)

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

[File Properties]

File Name

[OP-2.docx](/ePermitsExternal/faces/file?fileId=254238)

Hash

69479607BC9562B08AB509C90AEFE98E71F4EDE19190285883BFDDDDC24260BF

MIME-Type

application/vnd.openxmlformats-officedocument.wordprocessingml.document

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

Attach OP-REQ2 (Negative Applicable Requirement Determinations)

Attach OP-REQ3 (Applicable Requirements Summary)

Attach OP-PBRSUP (Permits by Rule Supplemental Table)

Attach OP-SUMR (Individual Unit Summary for Revisions)

Attach OP-MON (Monitoring Requirements)

[File Properties]

File Name

[OP-MON.docx](/ePermitsExternal/faces/file?fileId=254259)

Hash

C86DB3CB580BFFD69AED109695DAC980BA039DDA2F4C3497F6DBF0DE311FD8A8

MIME-Type application/vnd.openxmlformats-officedocument.wordprocessingml.document

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=254462>Control Device 30-6000 Compliance Test Excerpt.docx</a>

Hash 5E7637F1719B01A9D5057165E4BF8EACA5B567A6F9D4201DC71253171A79CC5F

MIME-Type application/vnd.openxmlformats-officedocument.wordprocessingml.document

[File Properties]

File Name <a href=/ePermitsExternal/faces/file?fileId=254260>OP-ACPS .docx</a>

Hash 1BB194AB0861BEC426F5C43DAAA14992389F142C3DC13EE1F4DF073C52CA629E

MIME-Type application/vnd.openxmlformats-officedocument.wordprocessingml.document

[File Properties]

File Name <a href=/ePermitsExternal/faces/file?fileId=254526>Signed Cover Letter.pdf</a>

Hash F6A8B8A41EE5D90D3AC24D7BC06551A40F49CC98054E1A0DC15985067F6723EF

MIME-Type application/pdf

[File Properties]

File Name <a href=/ePermitsExternal/faces/file?fileId=254527>Signed OP-CRO1.pdf</a>

Hash 8B0580233ABE72B30205360E6489D857BAFB82CCAE65B67B5E6251CBC2E78860

MIME-Type application/pdf

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

## Expedite Title V

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

No

## Certification

I certify that I am the 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 Kevin Mcgovern, the owner of the STEERS account ER104838.
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 1373.
9. My signature indicates that I am in agreement with the information on this form, and authorize its submittal to the TCEQ.

OWNER OPERATOR Signature: Kevin Mcgovern OWNER OPERATOR

Account Number:	ER104838
Signature IP Address:	8.227.164.174
Signature Date:	2025-04-30
Signature Hash:	F7925D35166504480DF83CD9D0345290F8E71BD5184B230DE7CC843A195FBC51
Form Hash Code at time of Signature:	D1598AA5F42E5BDE63D88FA39424B352CBD30CDD64620FD0F5E9504A7A3620ED

## Submission

Reference Number:	The application reference number is 779066
Submitted by:	The application was submitted by ER104838/Kevin Mcgovern
Submitted Timestamp:	The application was submitted on 2025-04-30 at 16:35:10 CDT
Submitted From:	The application was submitted from IP address 8.227.164.174
Confirmation Number:	The confirmation number is 650249

Steers Version:

The STEERS version is 6.90

Permit Number:

The permit number is 1373

## Additional Information

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Application Creator: This account was created by Jean Leonard

Unit ID No. R-1, Control Device ID No. 30-6000 Compliance Test Excerpt

SOURCE TESTING

Summary of Results

Table 2-1  
Summary of Results

Emissions Data				
Run Number	Run 1	Run 2	Run 3	Average
Date	6/3/21	6/7/21	6/7/21	--
Inlet 1				
<b>Ethylene Oxide Data</b>				
Emission Rate, lb/hr	77.9	61.9	183.7	107.9
<b>Total Volatile Organic Compounds Data</b>				
Emission Rate, lb/hr	26.3	20.6	60.9	36.0
Inlet 2				
<b>Ethylene Oxide Data</b>				
Emission Rate, lb/hr	254.3	272.6	355.1	294.0
<b>Total Volatile Organic Compounds Data</b>				
Emission Rate, lb/hr	85.0	90.9	117.5	97.8
Outlet				
<b>Ethylene Oxide Data</b>				
Emission Rate, lb/hr	0.021	0.23	0.010	0.089
Permit Limit, lb/hr	--	--	--	5.50
Removal Efficiency				
<b>Ethylene Oxide Data</b>				
Railcar (Inlet 3) Emission Rate, lb/hr*	1,500	1,500	2,600	1,867
Combined Inlet Emission Rate, lb/hr	1,832	1,835	3,139	2,269
Outlet Emission Rate, lb/hr	0.021	0.23	0.010	0.089
Removal Efficiency, %	99.999	99.987	99.9997	99.995
NESHAP Limit, RE	--	--	--	> 98%
Process Operating / Control System Data				
Run Number	Run 1	Run 2	Run 3	Average
Date	6/3/21	6/7/21	6/7/21	--
IFV'S Top Temperature, °F	91	93	92	92
Total Flow, KLBH	20.60	20.84	20.98	20.81