

Texas Commission on Environmental Quality

Title V Existing

2031

Site Information (Regulated Entity)

What is the name of the permit area to be authorized?	GLYCOL ETHERS UNIT & OXIDE DERIVATIVES UNIT
County	CALHOUN
Latitude (N) (##.#####)	28.516388
Longitude (W) (-###.#####)	96.776666
Primary SIC Code	2869
Secondary SIC Code	
Primary NAICS Code	325199
Secondary NAICS Code	
Regulated Entity Site Information	
What is the Regulated Entity's Number (RN)?	RN102181526
What is the name of the Regulated Entity (RE)?	UCC SEADRIFT OPERATIONS
Does the RE site have a physical address?	Yes
Physical Address	
Number and Street	7501 STATE HIGHWAY 185 N
City	SEADRIFT
State	TX
ZIP	77983
County	CALHOUN
Latitude (N) (##.#####)	28.499581
Longitude (W) (-###.#####)	-96.767508
Facility NAICS Code	
What is the primary business of this entity?	CHEMICAL PLANT

Customer (Applicant) Information

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

Responsible Official Contact

Person TCEQ should contact for questions about this application:

Organization Name	THE DOW CHEMICAL COMPANY
Prefix	MS
First	HEATHER
Middle	
Last	LYONS
Suffix	
Credentials	
Title	LEAD SITE MANUFACTURING DIRECTOR
Enter new address or copy one from list:	
Mailing Address	
Address Type	Domestic
Mailing Address (include Suite or Bldg. here, if applicable)	PO BOX 186
Routing (such as Mail Code, Dept., or Attn:)	
City	PORT LAVACA
State	TX
ZIP	77979
Phone (###-###-####)	3615532266
Extension	
Alternate Phone (###-###-####)	
Fax (###-###-####)	
E-mail	HLyons@dow.com

Duly Authorized Representative Contact

Person TCEQ should contact for questions about this application

Select existing DAR contact or enter a new contact.	FERNANDO FROLLINI(UNION CARBIDE C...)
Organization Name	UNION CARBIDE CORPORATION
Prefix	MR
First	FERNANDO
Middle	
Last	FROLLINI
Suffix	
Credentials	
Title	RESPONSIBLE CARE DIRECTOR
Enter new address or copy one from list:	
Mailing Address	
Address Type	Domestic
Mailing Address (include Suite or Bldg. here, if applicable)	PO BOX 186
Routing (such as Mail Code, Dept., or Attn:)	
City	PORT LAVACA
State	TX
Zip	77979
Phone (###-###-####)	3615716238
Extension	
Alternate Phone (###-###-####)	

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

E-mail

f.frollini@dow.com

Technical Contact

Person TCEQ should contact for questions about this application:

Select existing TC contact or enter a new contact.

Organization Name

Prefix

First

Middle

Last

Suffix

Credentials

Title

Enter new address or copy one from list:

Mailing Address

Address Type

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

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

City

State

ZIP

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

Extension

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

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

E-mail

VANESSA PEPPERS(UNION CARBIDE C...)

UNION CARBIDE CORPORATION

MRS

VANESSA

PEPPERS

ENVIRONMENTAL SPECIALIST

Domestic

PO BOX 186

PORT LAVACA

TX

77979

3615532174

VPeppers@dow.com

Title V General Information - Existing

1) Permit Type:

SOP

2) Permit Latitude Coordinate:

28 Deg 30 Min 59 Sec

3) Permit Longitude Coordinate:

96 Deg 46 Min 36 Sec

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

Update

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

2031-38472

5) Who will electronically sign this Title V application?

Duly Authorized Representative

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

No

Title V Attachments Existing

Attach OP-1 (Site Information Summary)

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

Attach OP-ACPS (Application Compliance Plan and Schedule)

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

[File Properties]

File Name	/ePermitsExternal/faces/file?fileId=310632 >OP_REQ1_Revised OPREQ1 and OPUA15.pdf
Hash	BA2EDD0AEF4674D147AFDCF5D66D32DE91F3B4A45F04155100F120CC08B6E898
MIME-Type	application/pdf

Attach OP-REQ2 (Negative Applicable Requirement Determinations)

Attach OP-REQ3 (Applicable Requirements Summary)

Attach OP-PBRSUP (Permits by Rule Supplemental Table)

[File Properties]

File Name	/ePermitsExternal/faces/file?fileId=310630 >OP-PBRSUP r1.pdf
Hash	5280D43100F8D6C0C92D600A78A699B24D5B5B6185A3A15445BFF79C77821E2E
MIME-Type	application/pdf

Attach OP-SUMR (Individual Unit Summary for Revisions)

Attach OP-MON (Monitoring Requirements)

Attach OP-UA (Unit Attribute) Forms

[File Properties]

File Name	/ePermitsExternal/faces/file?fileId=310633 >Revised OPREQ1 and OPUA15.pdf
Hash	BA2EDD0AEF4674D147AFDCF5D66D32DE91F3B4A45F04155100F120CC08B6E898
MIME-Type	application/pdf

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

Attach OP-CRO2 (Change of Responsible Official Information)

Attach OP-DEL (Delegation of Responsible Official)

Attach Void Request Form

Attach any other necessary information needed to complete the permit.

[File Properties]

File Name	/ePermitsExternal/faces/file?fileId=310634 >FOP O2031 Project 38472 Emails.pdf
Hash	4CAA53040801D2BFEBF1295C541C53EF0E10BBD0101D4FE5515F0EC0EC9F5FB0
MIME-Type	application/pdf

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

Certification

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

1. I am Fernando Frollini, the owner of the STEERS account ER100782.
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 2031.
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: Fernando Frollini OWNER OPERATOR

Account Number:	ER100782
Signature IP Address:	136.226.100.114
Signature Date:	2026-01-30
Signature Hash:	ADB18F39BF45922D7D54298D4BB38614B6108BA7F36B0BF4190AE641F752765D
Form Hash Code at time of Signature:	E078655322197FF23826A36529B31BCB14AE7AB4C3F25492C584657950E43F56

Submission

Reference Number:	The application reference number is 886540
Submitted by:	The application was submitted by ER100782/Fernando Frollini
Submitted Timestamp:	The application was submitted on 2026-01-30 at 13:51:47 CST
Submitted From:	The application was submitted from IP address 136.226.100.114
Confirmation Number:	The confirmation number is 738167
Steers Version:	The STEERS version is 6.94
Permit Number:	The permit number is 2031

Additional Information

Application Creator: This account was created by Vanessa N Peppers

From: Audrie Moses
Sent: Friday, January 23, 2026 1:56 PM
To: Peppers, Vanessa (V)
Subject: FOP O2031/Project 38472, Union Carbide Corporation/Seadrift Operations

Greetings,

I am contacting you today because certification is needed for the emails from 09/10/2025 and 09/15/2025. Please certify your responses in STEERS by January 30, 2026.

There are two options for certification in STEERS.

1. Certify in STEERS: Using the OP-CRO1, you can enter the date ranges of correspondence, and the entire time period will be certified. You can also just list the specific dates. With this option, you can either upload or mail in the documents.
2. Upload Submittals in STEERS: All submittals will automatically be certified once uploaded into STEERS.

The first option is usually preferred for lengthy updates.

Please let me know if I can answer any questions or provide any assistance.

Kind regards,

Audrie E. Moses

Permit Reviewer

Operating Permit Section (Title V)

Air Permits Division

Texas Commission on Environmental Quality

MC-163, P.O. Box 13087

Austin, TX 78711-3087

audrie.moses@tceq.texas.gov

Office: (512)239-3366



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

From: Peppers, Vanessa (V) <vpeppers@dow.com>
Sent: Wednesday, October 22, 2025 8:53 AM
To: Audrie Moses
Subject: RE: Working Draft Permit -- FOP O2031/Project 38472, Union Carbide Corporation/Seadrift Operations

Good morning,

I approve the draft. No changes are needed.

Vanessa Peppers

General Business

From: Audrie Moses <Audrie.Moses@tceq.texas.gov>
Sent: Monday, October 6, 2025 2:29 PM
To: Peppers, Vanessa (V) <vpeppers@dow.com>
Subject: Working Draft Permit -- FOP O2031/Project 38472, Union Carbide Corporation/Seadrift Operations

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

Greetings,

I have conducted a technical review of the revision application for Union Carbide Corporation, Seadrift Operations. An electronic copy of the Working Draft Permit (WDP) is attached for your review. This WDP contains the TCEQ determination of applicable requirements based on the information submitted in your application, and any updates provided. Here is the list of the changes that have been made.

1. All new units from form OP-2 have been added to the permit.
2. The issuance date for NSR Permit 22321 has been updated.
3. Special Term and Condition 13 has been updated to refer to the latest OP-PBRSUP form.

Please review the WDP and submit to me any comments you have on the working draft permit by **October 27, 2025**.

Please submit a written response by this deadline, even if you are not making any comments on the content of the WDP.

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

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

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

Please notify me when these updates have been submitted.

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

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

Thank you for your cooperation.

Sincerely,

Audrie E. Moses

Permit Reviewer

Operating Permit Section (Title V)

Air Permits Division

Texas Commission on Environmental Quality
MC-163, P.O. Box 13087
Austin, TX 78711-3087
audrie.moses@tceq.texas.gov
Office: (512)239-3366



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

From: Peppers, Vanessa (V) <vpeppers@dow.com>
Sent: Monday, September 15, 2025 11:14 AM
To: Audrie Moses
Subject: RE: Technical Review -- FOP O2031/Project38472, Union Carbide Corporation/Seadrift Operations
Attachments: Revised OPREQ1 and OPUA15.pdf; OP-PBRSUP r1.pdf

Attached are the updated forms.

The OP-PBRSUP file was correct. The OP-REQ1 has been updated with the NSR 22321 issue date and correct PBRs.

OPUA15 is also attached.

Vanessa Peppers

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

Date:	September 15, 2025
Permit No.:	O2031
RN No.:	RN102181526

Form OP-REQ1: Page 87

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

E. PSD Permits and PSD Major Pollutants

PSD Permit No.:	Issuance Date:	Pollutant(s):
PSD Permit No.:	Issuance Date:	Pollutant(s):
PSD Permit No.:	Issuance Date:	Pollutant(s):

If PSD Permits are held for the application area, please complete the Major NSR Summary Table located under the Technical Forms heading at: www.tceq.texas.gov/permitting/air/titlev/site/site_experts.html.

F. Nonattainment (NA) Permits and NA Major Pollutants

NA Permit No.:	Issuance Date:	Pollutant(s):
NA Permit No.:	Issuance Date:	Pollutant(s):
NA Permit No.:	Issuance Date:	Pollutant(s):

If NA Permits are held for the application area, please complete the Major NSR Summary Table located under the Technical Forms heading at: www.tceq.texas.gov/permitting/air/titlev/site/site_experts.html.

G. NSR Authorizations with FCAA § 112(g) Requirements

NSR Permit No.:	Issuance Date:	NSR Permit No.:	Issuance Date:
NSR Permit No.:	Issuance Date:	NSR Permit No.:	Issuance Date:
NSR Permit No.:	Issuance Date:	NSR Permit No.:	Issuance Date:

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

Authorization No.: 9537	Issuance Date: 7/10/2017	Authorization No.: 47091	Issuance Date: 12/9/2021
Authorization No.: 378	Issuance Date: 6/14/2024	Authorization No.: 170759	Issuance Date: 8/28/2023
Authorization No.: 22321	Issuance Date: 8/30/2024	Authorization No.:	Issuance Date:

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

Date:	September 15, 2025
Permit No.:	O2031
RN No.:	RN102181526

Form OP-REQ1: Page 88	
XII. NSR Authorizations (Attach additional sheets if necessary for sections E-J)	
I. Permits by Rule (30 TAC Chapter 106) for the Application Area	
<i>A list of selected Permits by Rule (previously referred to as standard exemptions) that are required to be listed in the FOP application is available in the instructions.</i>	
PBR No.: 106.261	Version No./Date: 11/1/2003
PBR No.: 106.262	Version No./Date: 11/1/2003
PBR No.: 106.472	Version No./Date: 9/4/2000
PBR No.: 106.478	Version No./Date: 9/4/2000
PBR No.:	Version No./Date:
J. Municipal Solid Waste and Industrial Hazardous Waste Permits With an Air Addendum	
Permit No.:	Issuance Date:

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

Date	Permit Number	Regulated Entity Number
September 15, 2025	O2031	RN102181526

Unit ID No.	Registration No.	PBR No.	Registration Date
586	75724	106.261, 106.262	5/17/2005
586	77766	106.261, 106.262	1/24/2006
586	83878	106.261, 106.262	1/29/2008
586	87805	106.261	4/27/2009
645-FUG	132097	106.262	5/13/2015
655	119294	106.262	6/20/2015
121-13	146155	106.261	5/18/2017
217	146257	106.262	5/18/2017
121-10	146257	106.261	5/18/2017
121-12	146257	106.261	5/18/2017
121-9	146257	106.261	5/18/2017
586	75724	106.261, 106.262	5/17/2005

Permit By Rule Supplemental Table (Page 2)
Table B: Claimed (not registered) Permits by Rule (30 TAC Chapter 106) for the Application Area
Texas Commission on Environmental Quality

Date	Permit Number	Regulated Entity Number
September 15, 2025	O2031	RN102181526

Unit ID No.	PBR No.	Version No./Date
135-25	106.472	9/4/2000
135-26	106.472	9/4/2000
135-28	106.472	9/4/2000
135-29	106.472	9/4/2000
121-13	106.478	9/4/2000

Permit By Rule Supplemental Table (Page 4)
Table D: Monitoring Requirements for registered and claimed PBRs for the Application Area
Texas Commission on Environmental Quality

Date	Permit Number	Regulated Entity Number
September 15, 2025	O2031	RN102181526

Unit ID No.	PBR No.	Version No./Date Or Registration No.	Monitoring Requirement
586	106.261, 106.262	75724	Monitored in accordance with the current Leak Detection and Repair (LDAR) fugitive monitoring program.
586	106.261, 106.262	77766	Monitored in accordance with the current Leak Detection and Repair (LDAR) fugitive monitoring program.
586	106.261, 106.262	83878	Monitored in accordance with the current Leak Detection and Repair (LDAR) fugitive monitoring program.
586	106.261	87805	Monitored in accordance with the current Leak Detection and Repair (LDAR) fugitive monitoring program.
645-FUG	106.262	132097	Monitored in accordance with the current Leak Detection and Repair (LDAR) fugitive monitoring program.
655	106.262	119294	Monitored in accordance with the current Leak Detection and Repair (LDAR) fugitive monitoring program.
121-13	106.261	146155	Maintain records of throughput.
217	106.262	146257	Maintain records of scrubber flowrate.
121-10	106.261	146257	Maintain records of throughput.
121-12	106.261	146257	Maintain records of throughput.
121-9	106.261	146257	Maintain records of throughput.
586	106.261, 106.262	75724	Monitored in accordance with the current Leak Detection and Repair (LDAR) fugitive monitoring program.
135-25	106.472	9/4/2000	Maintain records of throughput.
135-26	106.472	9/4/2000	Maintain records of throughput.
135-28	106.472	9/4/2000	Maintain records of throughput.
135-29	106.472	9/4/2000	Maintain records of throughput.
121-13	106.478	9/4/2000	Maintain records of throughput.

From: Audrie Moses <Audrie.Moses@tceq.texas.gov>

Sent: Monday, September 15, 2025 8:28 AM

To: Peppers, Vanessa (V) <vpeppers@dow.com>

Subject: Re: Technical Review -- FOP O2031/Project38472, Union Carbide Corporation/Seadrift Operations

Greetings,

Thank you for submitting the updated forms. I still have a few more questions in regard to the application. Please address the items below by Friday, September 19, 2025.

1. OP-PBRSUP: OP-REQ1 is not consistent with the OP-PBRSUP as the PBRs listed differ on each form. Please correct each form as needed. For the OP-PBRSUP, submit all four tables as a set and redate them all even if some tables are not changing.
 - a. PBRs 106.472 and 106.478 are both listed on the Table B and D of the OP-PBRSUP but they are not listed on the OP-REQ1 XII.I PBR section.
 - b. PBRs 106.263 and 106.264 are both listed on OP-REQ1 section XII.I but they are not included in the OP-PBRSUP.
2. OP-REQ1: Just to confirm, you do not wish to include the new date for NSR permit 22321? In section XII.H of the form OP-REQ1, the issue date for NSR permit 22321 is 10/05/2023. A renewal was issued on 08/30/2024. Would you like to incorporate this renewal? If so, please submit an updated section XII.H. If you would like to leave the date as 10/05/2023, please confirm.
3. OP-UA15, Table 2b – For units 1401, 1411, and 1501, an answer is needed for the Alternate Control Requirement question on Table 2b of form OP-UA15. This was not submitted previously.

Regards,

Audrie E. Moses

Permit Reviewer

Operating Permit Section (Title V)

Air Permits Division

Texas Commission on Environmental Quality

MC-163, P.O. Box 13087

Austin, TX 78711-3087

audrie.moses@tceq.texas.gov

Office: (512)239-3366



How are we doing? Fill out our online customer satisfaction survey at

www.tceq.texas.gov/customersurvey

From: Peppers, Vanessa (V) <vpeppers@dow.com>
Sent: Wednesday, September 10, 2025 4:31 PM
To: Audrie Moses
Subject: RE: Technical Review -- FOP O2031/Project38472, Union Carbide Corporation/Seadrift Operations
Attachments: O2031 Forms.pdf; OP-PBRSUP.pdf

Attached are the updated forms.

Vanessa Peppers

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

Date:	September 10, 2025
Permit No.:	O2031
RN No.:	RN102181526

Form OP-REQ1: Page 88	
XII. NSR Authorizations (Attach additional sheets if necessary for sections E-J)	
I. Permits by Rule (30 TAC Chapter 106) for the Application Area	
<i>A list of selected Permits by Rule (previously referred to as standard exemptions) that are required to be listed in the FOP application is available in the instructions.</i>	
PBR No.: 106.261	Version No./Date: 11/1/2003
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PBR No.: 106.263	Version No./Date: 11/1/2001
PBR No.: 106.264	Version No./Date: 9/4/2000
PBR No.:	Version No./Date:
J. Municipal Solid Waste and Industrial Hazardous Waste Permits With an Air Addendum	
Permit No.:	Issuance Date:

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

Date: September 10, 2025	Regulated Entity No.: RN102181526	Permit No.: O2031
Company Name: Union Carbide Corporation	Area Name: Oxide Derivatives/Glycol Ethers Units	

Revision No.	Unit/Group/ Process ID No.	SOP/GOP Index No.	Pollutant	Monitoring and Testing Requirements	Recordkeeping Requirements	Reporting Requirements
<i>1</i>	<i>1401</i>	<i>R5121-01</i>	<i>VOC</i>	<i>[GR]115.125,[R]115.126(2)</i>	<i>[R]115.126, [R]115.126(2)</i>	<i>NONE</i>
<i>2</i>	<i>1411</i>	<i>R5121-01</i>	<i>VOC</i>	<i>[GR]115.125,[R]115.126(2)</i>	<i>[R]115.126, [R]115.126(2)</i>	<i>NONE</i>
<i>3</i>	<i>1501</i>	<i>R5121-01</i>	<i>VOC</i>	<i>[GR]115.125,[R]115.126(2)</i>	<i>[R]115.126, [R]115.126(2)</i>	<i>NONE</i>
<i>4</i>	<i>1412</i>	<i>R5112-01</i>	<i>VOC</i>	<i>[D]115.114(c)(1)(A), [D]115.114(c)(2)(A)</i>		<i>[D]115.114(c)(1)(B), [D]115.114(c)(2)(B)</i>
<i>5</i>	<i>1435</i>	<i>63PPP-01</i>	<i>HAPS</i>	<i>General High Level Applicability</i>	<i>General High Level Applicability</i>	<i>General High Level Applicability</i>
<i>6</i>	<i>790</i>	<i>63PPP-01</i>	<i>HAPS</i>	<i>General High Level Applicability</i>	<i>General High Level Applicability</i>	<i>General High Level Applicability</i>
<i>7</i>	<i>795</i>	<i>60VVb-01</i>	<i>VOC</i>	<i>General High Level Applicability</i>	<i>General High Level Applicability</i>	<i>General High Level Applicability</i>
<i>7</i>	<i>795</i>	<i>63PPP-01</i>	<i>HAPS</i>	<i>General High Level Applicability</i>	<i>General High Level Applicability</i>	<i>General High Level Applicability</i>

TCEQ 10018 (APDG 5939v2, Revised 06/15) OP-REQ3 – Applicable Requirements Summary
This form is for use by sources subject to air quality permit requirements and may be revised periodically. (Title V Release 11/08)

Permit By Rule Supplemental Table (Page 1)
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586	77766	106.261, 106.262	1/24/2006
586	83878	106.261, 106.262	1/29/2008
586	87805	106.261	4/27/2009
645-FUG	132097	106.262	5/13/2015
655	119294	106.262	6/20/2015
121-13	146155	106.261	5/18/2017
217	146257	106.262	5/18/2017
121-10	146257	106.261	5/18/2017
121-12	146257	106.261	5/18/2017
121-9	146257	106.261	5/18/2017
586	75724	106.261, 106.262	5/17/2005

Permit By Rule Supplemental Table (Page 2)
Table B: Claimed (not registered) Permits by Rule (30 TAC Chapter 106) for the Application Area
Texas Commission on Environmental Quality

Date	Permit Number	Regulated Entity Number
September 10, 2025	O2031	RN102181526

Unit ID No.	PBR No.	Version No./Date
135-25	106.472	9/4/2000
135-26	106.472	9/4/2000
135-28	106.472	9/4/2000
135-29	106.472	9/4/2000
121-13	106.478	9/4/2000

Permit By Rule Supplemental Table (Page 4)
Table D: Monitoring Requirements for registered and claimed PBRs for the Application Area
Texas Commission on Environmental Quality

Date	Permit Number	Regulated Entity Number
September 10, 2025	O2031	RN102181526

Unit ID No.	PBR No.	Version No./Date Or Registration No.	Monitoring Requirement
586	106.261, 106.262	75724	Monitored in accordance with the current Leak Detection and Repair (LDAR) fugitive monitoring program.
586	106.261, 106.262	77766	Monitored in accordance with the current Leak Detection and Repair (LDAR) fugitive monitoring program.
586	106.261, 106.262	83878	Monitored in accordance with the current Leak Detection and Repair (LDAR) fugitive monitoring program.
586	106.261	87805	Monitored in accordance with the current Leak Detection and Repair (LDAR) fugitive monitoring program.
645-FUG	106.262	132097	Monitored in accordance with the current Leak Detection and Repair (LDAR) fugitive monitoring program.
655	106.262	119294	Monitored in accordance with the current Leak Detection and Repair (LDAR) fugitive monitoring program.
121-13	106.261	146155	Maintain records of throughput.
217	106.262	146257	Maintain records of scrubber flowrate.
121-10	106.261	146257	Maintain records of throughput.
121-12	106.261	146257	Maintain records of throughput.
121-9	106.261	146257	Maintain records of throughput.
586	106.261, 106.262	75724	Monitored in accordance with the current Leak Detection and Repair (LDAR) fugitive monitoring program.
135-25	106.472	9/4/2000	Maintain records of throughput.
135-26	106.472	9/4/2000	Maintain records of throughput.
135-28	106.472	9/4/2000	Maintain records of throughput.
135-29	106.472	9/4/2000	Maintain records of throughput.
121-13	106.478	9/4/2000	Maintain records of throughput.

General Business

From: Audrie Moses <Audrie.Moses@tceq.texas.gov>
Sent: Wednesday, September 10, 2025 4:00 PM
To: Peppers, Vanessa (V) <vpeppers@dow.com>
Subject: Re: Technical Review -- FOP O2031/Project38472, Union Carbide Corporation/Seadrift Operations

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

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

Good Morning,

Please give me a status update by Friday, 9/12. I need these updated forms in order to make the requested updates to the permit. Thank you.

Regards,

Audrie E. Moses

Permit Reviewer
Operating Permit Section (Title V)
Air Permits Division
Texas Commission on Environmental Quality
MC-163, P.O. Box 13087
Austin, TX 78711-3087
audrie.moses@tceq.texas.gov
Office: (512)239-3366



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

From: Audrie Moses <Audrie.Moses@tceq.texas.gov>

Sent: Thursday, August 28, 2025 1:15 PM

To: vpeppers@dow.com <vpeppers@dow.com>

Subject: Re: Technical Review -- FOP O2031/Project38472, Union Carbide Corporation/Seadrift Operations

Good Afternoon,

After reviewing the application, I have a few questions. Please address the items below by Friday, September 5, 2025.

1. Form OP-REQ1 – For NSR permit 22321, the current date listed in section XII.H of form OP-REQ1 is 10/05/2023. A renewal was issued on 08/30/2024. Would you like to incorporate this renewal? If so, please submit an updated section XII.H.
2. Form OP-UA15, Table 2b – For units 1401, 1411, and 1501, an answer is needed for the Alternate Control Requirement question on Table 2b of form OP-UA15.
3. Form OP-PBRSUP – Based on the application, changes were made to the PBR information for this permit area. Therefore, we need an updated OP-PBRSUP. For this form, please submit all four tables as a set and re-date each table even if that table is not changing.

Audrie E. Moses

Permit Reviewer

Operating Permit Section (Title V)

Air Permits Division

Texas Commission on Environmental Quality

MC-163, P.O. Box 13087

Austin, TX 78711-3087

audrie.moses@tceq.texas.gov

Office: (512)239-3366



From: Audrie Moses
Sent: Thursday, August 21, 2025 3:10 PM
To: vpeppers@dow.com
Subject: Technical Review -- FOP O2031/Project38472, Union Carbide Corporation/Seadrift Operations

Good Afternoon,

I have been assigned to the Federal Operating Permit (FOP) revision application of Permit No. O2031 for Union Carbide Corporation, Seadrift Operations, Glycol Ethers Unit & Oxide Derivatives Unit. This application has been assigned Project No. 38472. Please address all correspondence pertaining to this permit application, including any updates, to me at the address below, and use both the Permit and Project reference numbers above to facilitate tracking.

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

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

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

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

Please notify me when these updates have been submitted.

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

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

Thank you for your cooperation.

Sincerely,

Audrie E. Moses

Operating Permit Section (Title V)
Air Permits Division
Texas Commission on Environmental Quality
MC-163, P.O. Box 13087
Austin, TX 78711-3087
audrie.moses@tceq.texas.gov

Phone: (512)239-3366



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Texas Commission on Environmental Quality

Title V Existing

2031

Site Information (Regulated Entity)

What is the name of the permit area to be authorized?	GLYCOL ETHERS UNIT & OXIDE DERIVATIVES UNIT
County	CALHOUN
Latitude (N) (##.#####)	28.516388
Longitude (W) (-###.#####)	96.776666
Primary SIC Code	2869
Secondary SIC Code	
Primary NAICS Code	325199
Secondary NAICS Code	
Regulated Entity Site Information	
What is the Regulated Entity's Number (RN)?	RN102181526
What is the name of the Regulated Entity (RE)?	UCC SEADRIFT OPERATIONS
Does the RE site have a physical address?	Yes
Physical Address	
Number and Street	7501 STATE HIGHWAY 185 N
City	SEADRIFT
State	TX
ZIP	77983
County	CALHOUN
Latitude (N) (##.#####)	28.515
Longitude (W) (-###.#####)	-96.771666
Facility NAICS Code	
What is the primary business of this entity?	MANUFACTURING ORGANIC CHEMICALS & THERMOPLASTIC RE

Customer (Applicant) Information

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

Responsible Official Contact

Person TCEQ should contact for questions about this application:

Organization Name	THE DOW CHEMICAL COMPANY
Prefix	MS
First	HEATHER
Middle	
Last	LYONS
Suffix	
Credentials	
Title	LEAD SITE MANUFACTURING DIRECTOR
Enter new address or copy one from list:	
Mailing Address	
Address Type	Domestic
Mailing Address (include Suite or Bldg. here, if applicable)	PO BOX 186
Routing (such as Mail Code, Dept., or Attn:)	
City	PORT LAVACA
State	TX
ZIP	77979
Phone (###-###-####)	3615532266
Extension	
Alternate Phone (###-###-####)	
Fax (###-###-####)	
E-mail	HLyons@dow.com

Duly Authorized Representative Contact

Person TCEQ should contact for questions about this application

Select existing DAR contact or enter a new contact.

Organization Name	FERNANDO FROLLINI(UNION CARBIDE C...)
Prefix	UNION CARBIDE CORPORATION
First	MR
Middle	FERNANDO
Last	FROLLINI
Suffix	
Credentials	
Title	RESPONSIBLE CARE DIRECTOR
Enter new address or copy one from list:	
Mailing Address	
Address Type	Domestic
Mailing Address (include Suite or Bldg. here, if applicable)	PO BOX 186
Routing (such as Mail Code, Dept., or Attn:)	
City	PORT LAVACA
State	TX
Zip	77979
Phone (###-###-####)	3615716238

Extension

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

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

E-mail

f.frollini@dow.com

Technical Contact

Person TCEQ should contact for questions about this application:

Select existing TC contact or enter a new contact.

VANESSA PEPPERS(UNION CARBIDE C...)

Organization Name

UNION CARBIDE CORPORATION

Prefix

MRS

First

VANESSA

Middle

Last

PEPPERS

Suffix

Credentials

Title

ENVIRONMENTAL SPECIALIST

Enter new address or copy one from list:

Mailing Address

Address Type

Domestic

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

PO BOX 186

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

City

PORT LAVACA

State

TX

ZIP

77979

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

3615532174

Extension

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

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

E-mail

VPeppers@dow.com

Title V General Information - Existing

1) Permit Type:

SOP

2) Permit Latitude Coordinate:

28 Deg 30 Min 59 Sec

3) Permit Longitude Coordinate:

96 Deg 46 Min 36 Sec

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

New Application

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

Streamlined Revision

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

No

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

No

5) Who will electronically sign this Title V application?

Duly Authorized Representative

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

No

requirements?

Title V Attachments Existing

Attach OP-1 (Site Information Summary)

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

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

Attach OP-REQ2 (Negative Applicable Requirement Determinations)

Attach OP-REQ3 (Applicable Requirements Summary)

Attach OP-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.

[File Properties]

File Name	O2031 T5 Minor Revision Application 06-27-2025.pdf
Hash	5A86432B372C75147FA4218E7496297A19EADA13A184E86CD1462504CEFF46AB
MIME-Type	application/pdf

Expedite Title V

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

No

Certification

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

1. I am Fernando Frollini, the owner of the STEERS account ER100782.
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 2031.
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: Fernando Frollini OWNER OPERATOR

Account Number:	ER100782
Signature IP Address:	165.225.32.112
Signature Date:	2025-06-30
Signature Hash:	60612B9C913A6EE7573B7B8EDEF1DF44C01523E226D9CACEA6740E4692B5EB52
Form Hash Code at time of Signature:	C5ED38FF45C0C29E6E431F1E11F384E5779C851F00ECEB69E99E94DB2198264C

Submission

Reference Number:	The application reference number is 768853
Submitted by:	The application was submitted by ER100782/Fernando Frollini
Submitted Timestamp:	The application was submitted on 2025-06-30 at 14:06:45 CDT
Submitted From:	The application was submitted from IP address 165.225.32.112
Confirmation Number:	The confirmation number is 661748
Steers Version:	The STEERS version is 6.92
Permit Number:	The permit number is 2031

Additional Information

Application Creator: This account was created by Vanessa N Peppers



June 27, 2025

Electronic Submittal via ePermits

Mr. Johnny Bowers
TCEQ Air Permits Initial Review Team (APIRT), MC-161
P.O. Box 13087
Austin, TX 78711-3087

Union Carbide Corporation: CN601688781; RN102181526
Oxide Derivatives/Glycol Ethers Units – Title V Operating Permit O2031
Site Operating Permit Minor Revision Application

Dear Mr. Bowers,

The purpose of this submittal is to apply for a Title V minor revision in compliance with 30 TAC Chapter 122, Subchapter, C §122.215 and §122.217, for Federal Operating Permit No. O2031, Oxide Derivatives/Glycol Ethers Units. This minor revision is being submitted to incorporate units that are a part of a new Alkoxylation Unit that was authorized via NSR 170759, which was approved on 8/28/2023.

The following forms are included in this submittal as part of the permit application:

- Form OP-2
- Form OP-SUMR
- Form OP-UAs
- Form OP-REQ1 (87-88 only)
- Form OP-REQ3

For future correspondence regarding this permit application, Vanessa Peppers can be contacted at 361-553-2174 or via email at VPeppers@dow.com.

Sincerely,

A handwritten signature in blue ink that reads "Vanessa Peppers".

Vanessa Peppers
Environmental Manager

enclosure

cc:
US EPA Region 6
TCEQ Air Section Manager, Region 14

R6AirPermitsTX@epa.gov
R14APDMail@tceq.texas.gov



Union Carbide Corporation

Permit O2031 Oxide Derivatives/Glycol Ethers Units

Site Operating Permit Minor Revision Application

June 27, 2025

Table of Contents

Section 1 - Administrative Forms	1
Form OP-2	2
Form OP-SUMR	8
Section 2 – Unit Attribute Forms	9
Form OP-UA1 – Miscellaneous Unit Attributes.....	10
Form OP-UA3 – Storage Tank/Vessel Attributes	11
Form OP-UA15 – Emission Point/Stationary Vent/Distillation Operation Vent/Process Vent Attributes...	13
Section 3 - Applicability Identification Forms	15
Form OP-REQ1	16
Form OP-REQ3	18

Section 1 - Administrative Forms

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

Date: June 27, 2025	
Permit No.: O2031	
Regulated Entity No.: RN102181526	
Company Name: Union Carbide Corporation	
For Submissions to EPA	
Has an electronic copy of this application been submitted (or is being submitted) to EPA? <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO	
I. Application Type	
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	
II. Qualification Statement	
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**

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

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

VOC NO_x SO₂ PM₁₀ CO Pb HAP

Other:

IV. Reference Only Requirements (For reference only)

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

V. Delinquent Fees and Penalties

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

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

Date: June 27, 2025
Permit No.: O2031
Regulated Entity No.: RN102181526
Company Name: Union Carbide Corporation

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

Revision No.	Revision Code	Unit/Group		Process Applicable Form	NSR Authorization	Description of Change and Provisional Terms and Conditions
		New Unit	ID No.			
1	MS-A	YES	1401	OP-UA15	170759	Please add this unit to the Title V Permit. Please add 30 TAC Chapter 115, Vent Gas Controls positive applicability to this unit.
2	MS-A	YES	1411	OP-UA15	170759	Please add this unit to the Title V Permit. Please add 30 TAC Chapter 115, Vent Gas Controls positive applicability to this unit.
3	MS-A	YES	1501	OP-UA15	170759	Please add this unit to the Title V Permit. Please add 30 TAC Chapter 115, Vent Gas Controls positive applicability to this unit.
4	MS-A	YES	1412	OP-UA3	170759	Please add this unit to the Title V Permit. Please add 30 TAC Chapter 115, Storage of VOC positive applicability to this unit.
5	MS-A	YES	1435	OP-UA1	170759	Please add this unit to the Title V Permit. Please add 40 CFR Part 63 Subpart PPP, Polyether Polyols Production positive applicability to this unit.

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

Date: June 27, 2025
Permit No.: O2031
Regulated Entity No.: RN102181526
Company Name: Union Carbide Corporation

Revision No.	Revision Code	New Unit	Unit/Group ID No.	Process Applicable Form	NSR Authorization.	Description of Change and Provisional Terms and Conditions
6	MS-A	YES	790	OP-UA1	170759	<p>Please add this unit to the Title V Permit.</p> <p>Please add 40 CFR Part 63 Subpart PPP, Polyether Polyols Production positive applicability to this unit.</p>
7	MS-A	YES	795	OP-UA1	170759	<p>Please add this unit to the Title V Permit.</p> <p>Please add 40 CFR Part 60 Subpart VVb and 40 CFR Part 63 Subpart PPP, Polyether Polyols Production positive applicability to this unit.</p>
8	MS-A	NO	N/A	OP-REQ1	N/A	<p>Union Carbide Corporation (UCC) is requesting to update the Preconstruction Authorizations. Please see the attached Form OP-REQ1 .</p>

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

Date: June 27, 2025	
Permit No.: O2031	
Regulated Entity No.: RN102181526	
Company Name: Union Carbide Corporation	
I. Significant Revision <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 checked="" type="checkbox"/> YES <input 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:

Pollutant	Description of the Change in Pollutant Emissions
Phosphoric Acid	The increase in emissions is due to the installation of a phosphoric acid tank, as well as corresponding fugitive emissions.
Particulate Matter	The increase in emissions is due to the installation of a cooling tower.
Volatile Organic Compounds	The increase in emissions is due to the installation of a diethylene glycol tank, as well as corresponding fugitive and maintenance, startup, and shutdown emissions.

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

[Table 1](#)

Date	Permit No.	Regulated Entity No.
June 27, 2025	O2031	RN102181526

Unit/Process AI	Unit/Process Revision No.	Unit/Process ID No.	Unit/Process Applicable Form	Unit/Process Name/ Description	Unit/Process CAM	Preconstruction Authorizations 30 TAC Chapter 116/ 30 TAC Chapter 106	Preconstruction Authorizations Title I
A	1	1401	OP-UA15	R1401 REACTOR		170759	
A	2	1411	OP-UA15	D1411 DROP TANK		170759	
A	3	1501	OP-UA15	R1501 REACTOR		170759	
A	4	1412	OP-UA3	STORAGE TANK 1412		170759	
A	5	1435	OP-UA1	STORAGE TANK 1435		170759	
A	6	790	OP-UA1	PEG COOLING TOWER		170759	
A	7	795	OP-UA1	PEG FUGITIVE EMISSIONS		170759	

Section 2 – Unit Attribute Forms

**Texas Commission on Environmental Quality
Miscellaneous Unit Attributes
Form OP-UA1 (Page 1)
Federal Operating Permit Program**

Date:	June 27, 2025
Permit No.:	O2031
Regulated Entity No.:	RN102181526

Unit ID No.	SOP/GOP Index No.	Unit Type	Date Constructed/Placed in Service	Functionally Identical Replacement	Maximum Rated Capacity	Technical Information and Unit Description
1435	63PPP-01	EU				<i>Please add General High Level Applicability to 40 CFR Part 60, Subpart PPP. Surge Control Vessel. 46,130 gallons, 0.0002 psia</i>
790	63PPP-01	EP				<i>Please add General High Level Applicability to 40 CFR Part 60, Subpart PPP. Recirculating heat exchange system</i>
795	60VVB-01	EU				<i>Please add General High-Level Applicability to 40 CFR Part 60, Subpart VVb. Alkoxylation Plant is producing PEG 8000 as the final product. Polyethylene glycol (CAS 25322-68-3) which is a listed SOCOMI chemical under NSPS VV</i>
795	63PPP-01	EU				<i>Please add General High Level Applicability to 40 CFR Part 60, Subpart PPP. Fugitive components. 10 PRDs to atmosphere. 3 have rupture disks 6=Non hazardous (steam, water, etc.) 1=acetic acid 9 psig Not applicable = 6 Devices that are actuated either by a pressure of less than or equal to 2.5 psig or by a vacuum</i>

**Emission Point/Stationary Vent/Distillation Operation Vent/Process Vent Attributes
Form OP-UA15 (Page 3)
Federal Operating Permit Program
Table 2a: Title 30 Texas Administrative Code Chapter 115 (30 TAC Chapter 115)
Subchapter B: Vent Gas Control
Texas Commission on Environmental Quality**

Date	Permit No.	Regulated Entity No.
June 27, 2025	O2031	RN102181526

Emission Point ID No.	SOP/GOP Index No.	Chapter 115 Division	Combustion Exhaust	Vent Type	Total Uncontrolled VOC Weight	Combined 24-Hour VOC Weight	VOC Concentration	VOC Concentration or Emission Rate at Maximum Operating Conditions
<i>GRP-HONV</i>	<i>R5121-01</i>	<i>NO</i>	<i>NO</i>	<i>CLASVOC</i>		<i>100-</i>		
<i>780</i>	<i>R5121-01</i>	<i>NO</i>	<i>NO</i>	<i>CLASVOC</i>		<i>100-</i>		
<i>121-1</i>	<i>R5121-01</i>	<i>NO</i>	<i>NO</i>	<i>CLASVOC</i>		<i>100-</i>		
<i>A-125</i>	<i>R5121-01</i>	<i>NO</i>	<i>NO</i>	<i>CLASVOC</i>		<i>100-</i>		
<i>RCYTK</i>	<i>R5121-01</i>	<i>NO</i>	<i>NO</i>	<i>CLASVOC</i>		<i>100-</i>		
<i>1401</i>	<i>R5121-01</i>	<i>NO</i>	<i>NO</i>	<i>CLASVOC</i>				
<i>1501</i>	<i>R5121-01</i>	<i>NO</i>	<i>NO</i>	<i>CLASVOC</i>				
<i>1411</i>	<i>R5121-01</i>	<i>NO</i>	<i>NO</i>	<i>CLASVOC</i>				

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

Section 3 - Applicability Identification Forms

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

Date:	June 27, 2025
Permit No.:	O2031
RN No.:	RN102181526

Form OP-REQ1: Page 87			
XII. NSR Authorizations (Attach additional sheets if necessary for sections E-J)			
E. PSD Permits and PSD Major Pollutants			
PSD Permit No.:	Issuance Date:	Pollutant(s):	
PSD Permit No.:	Issuance Date:	Pollutant(s):	
PSD Permit No.:	Issuance Date:	Pollutant(s):	
<i>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.</i>			
F. Nonattainment (NA) Permits and NA Major Pollutants			
NA Permit No.:	Issuance Date:	Pollutant(s):	
NA Permit No.:	Issuance Date:	Pollutant(s):	
NA Permit No.:	Issuance Date:	Pollutant(s):	
<i>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.</i>			
G. NSR Authorizations with FCAA § 112(g) Requirements			
NSR Permit No.:	Issuance Date:	NSR Permit No.:	Issuance Date:
NSR Permit No.:	Issuance Date:	NSR Permit No.:	Issuance Date:
NSR Permit No.:	Issuance Date:	NSR Permit No.:	Issuance Date:
H. Title 30 TAC Chapter 116 Permits, Special Permits, Standard Permits, Other Authorizations (Other Than Permits By Rule, PSD Permits, NA Permits) for the Application Area			
Authorization No.: 9537	Issuance Date: 7/10/2017	Authorization No.: 47091	Issuance Date: 12/9/2021
Authorization No.: 378	Issuance Date: 6/14/2024	Authorization No.: 170759	Issuance Date: 8/28/2023
Authorization No.: 22321	Issuance Date: 10/05/2023	Authorization No.:	Issuance Date:

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

Date:	June 27, 2025
Permit No.:	O2031
RN No.:	RN102181526

Form OP-REQ1: Page 88	
XII. NSR Authorizations (Attach additional sheets if necessary for sections E-J)	
I. Permits by Rule (30 TAC Chapter 106) for the Application Area	
<i>A list of selected Permits by Rule (previously referred to as standard exemptions) that are required to be listed in the FOP application is available in the instructions.</i>	
PBR No.: 106.261	Version No./Date: 11/1/2003
PBR No.: 106.262	Version No./Date: 11/1/2003
PBR No.: 106.263	Version No./Date: 11/1/2001
PBR No.: 106.264	Version No./Date: 9/4/2000
PBR No.:	Version No./Date:
J. Municipal Solid Waste and Industrial Hazardous Waste Permits With an Air Addendum	
Permit No.:	Issuance Date:

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

Date: June 27, 2025	Regulated Entity No.: RN102181526	Permit No.: O2031
Company Name: Union Carbide Corporation	Area Name: Oxide Derivatives/Glycol Ethers Units	

Revision No.	Unit/Group/Process		SOP/GOP Index No.	Pollutant	Applicable Regulatory Requirement	
	ID No.	Applicable Form			Name	Standard(s)
<i>1</i>	<i>1401</i>	<i>OP-UA15</i>	<i>R5121-01</i>	<i>VOC</i>	<i>30 TAC Chapter 115, Vent Gas Controls</i>	<i>115.127(c)(1)(B), 115.127(c)(1)</i>
<i>2</i>	<i>1411</i>	<i>OP-UA15</i>	<i>R5121-01</i>	<i>VOC</i>	<i>30 TAC Chapter 115, Vent Gas Controls</i>	<i>115.127(c)(1)(B), 115.127(c)(1)</i>
<i>3</i>	<i>1501</i>	<i>OP-UA15</i>	<i>R5121-01</i>	<i>VOC</i>	<i>30 TAC Chapter 115, Vent Gas Controls</i>	<i>115.127(c)(1)(B), 115.127(c)(1)</i>
<i>4</i>	<i>1412</i>	<i>OP-UA3</i>	<i>R5112-01</i>	<i>VOC</i>	<i>30 TAC Chapter 115, Storage of VOCs</i>	<i>115.112(c)(1)</i>
<i>5</i>	<i>1435</i>	<i>OP-UA1</i>	<i>63PPP-01</i>	<i>HAPS</i>	<i>40 CFR Part 63, Subpart PPP</i>	<i>General High Level Applicability</i>
<i>6</i>	<i>790</i>	<i>OP-UA1</i>	<i>63PPP-01</i>	<i>HAPS</i>	<i>40 CFR Part 63, Subpart PPP</i>	<i>General High Level Applicability</i>
<i>7</i>	<i>795</i>	<i>OP-UA1</i>	<i>60VVb-01</i>	<i>VOC</i>	<i>40 CFR Part 60, Subpart VVb</i>	<i>General High Level Applicability</i>
<i>7</i>	<i>795</i>	<i>OP-UA1</i>	<i>63PPP-01</i>	<i>HAPS</i>	<i>40 CFR Part 63, Subpart PPP</i>	<i>General High Level Applicability</i>

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

Date: June 27, 2025	Regulated Entity No.: RN102181526	Permit No.: O2031
Company Name: Union Carbide Corporation	Area Name: Oxide Derivatives/Glycol Ethers Units	

Revision No.	Unit/Group/ Process ID No.	SOP/GOP Index No.	Pollutant	Monitoring and Testing Requirements	Recordkeeping Requirements	Reporting Requirements
<i>1</i>	<i>1401</i>	<i>R5121-01</i>	<i>VOC</i>	<i>[GR]115.125,[R]115.126(2)</i>	<i>[R]115.126, [R]115.126(2)</i>	<i>NONE</i>
<i>2</i>	<i>1411</i>	<i>R5121-01</i>	<i>VOC</i>	<i>[GR]115.125,[R]115.126(2)</i>	<i>[R]115.126, [R]115.126(2)</i>	<i>NONE</i>
<i>3</i>	<i>1501</i>	<i>R5121-01</i>	<i>VOC</i>	<i>[GR]115.125,[R]115.126(2)</i>	<i>[R]115.126, [R]115.126(2)</i>	<i>NONE</i>
<i>4</i>	<i>1412</i>	<i>R5112-01</i>	<i>VOC</i>	<i>[D]115.114(c)(1)(A), [D]115.114(c)(2)(A)</i>		<i>[D]115.114(c)(1)(B), [D]115.114(c)(2)(B)</i>
<i>5</i>	<i>1435</i>	<i>63PPP-01</i>	<i>HAPS</i>	<i>General High Level Applicability</i>	<i>General High Level Applicability</i>	<i>General High Level Applicability</i>
<i>6</i>	<i>790</i>	<i>63PPP-01</i>	<i>HAPS</i>	<i>General High Level Applicability</i>	<i>General High Level Applicability</i>	<i>General High Level Applicability</i>
<i>7</i>	<i>795</i>	<i>60VVb-01</i>	<i>VOC</i>	<i>General High Level Applicability</i>	<i>General High Level Applicability</i>	<i>General High Level Applicability</i>
<i>7</i>	<i>795</i>	<i>63PPP-01</i>	<i>HAPS</i>	<i>General High Level Applicability</i>	<i>General High Level Applicability</i>	<i>General High Level Applicability</i>

TCEQ 10018 (APDG 5939v2, Revised 06/15) OP-REQ3 – Applicable Requirements Summary
This form is for use by sources subject to air quality permit requirements and may be revised periodically. (Title V Release 11/08)