

Texas Commission on Environmental Quality

Title V Existing

2203

Site Information (Regulated Entity)

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

Customer (Applicant) Information

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

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

Responsible Official Contact

Person TCEQ should contact for questions about this application:

Organization Name	THE DOW CHEMICAL COMPANY
Prefix	MR
First	JOHN
Middle	
Last	SAMPSON
Suffix	
Credentials	
Title	SENIOR VICE PRESIDENT
Enter new address or copy one from list:	
Mailing Address	
Address Type	Domestic
Mailing Address (include Suite or Bldg. here, if applicable)	2301 N BRAZOSPORT BLVD
Routing (such as Mail Code, Dept., or Attn:)	
City	FREEPORT
State	TX
ZIP	77541
Phone (###-###-####)	9792389978
Extension	
Alternate Phone (###-###-####)	
Fax (###-###-####)	9792358116
E-mail	txles@dow.com

Duly Authorized Representative Contact

Person TCEQ should contact for questions about this application

Select existing DAR contact or enter a new contact.

Organization Name	FRAN FALCON(THE DOW CHEMICA...)
Prefix	THE DOW CHEMICAL COMPANY
First	MS
Middle	FRAN
Last	FALCON
Suffix	
Credentials	
Title	EH&S REGIONAL LEVERAGED DELIVERY DIRECTOR
Enter new address or copy one from list:	
Mailing Address	
Address Type	Domestic

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

2101 N BRAZOSPORT BLVD

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

City

FREEPORT

State

TX

Zip

77541

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

9792389764

Extension

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

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

9792380317

E-mail

fqfalcon@dow.com

Technical Contact

Person TCEQ should contact for questions about this application:

Select existing TC contact or enter a new contact.

CRYSTAL SCHMIDT(THE DOW CHEMICA...)

Organization Name

THE DOW CHEMICAL COMPANY

Prefix

MRS

First

CRYSTAL

Middle

Last

SCHMIDT

Suffix

Credentials

Title

AIR PERMIT MANAGER

Enter new address or copy one from list:

Mailing Address

Address Type

Domestic

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

332 HIGHWAY 332 E

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

City

LAKE JACKSON

State

TX

ZIP

77566

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

9792381742

Extension

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

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

E-mail

cschmidt6@dow.com

Title V General Information - Existing

1) Permit Type:

SOP

2) Permit Latitude Coordinate:

29 Deg 24 Min 45 Sec

3) Permit Longitude Coordinate:

95 Deg 56 Min 41 Sec

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

Update

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

2203-39097

5) Who will electronically sign this Title V application?

Duly Authorized Representative

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

No

Title V Attachments Existing

Attach OP-1 (Site Information Summary)

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

Attach OP-ACPS (Application Compliance Plan and Schedule)

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

Attach OP-REQ2 (Negative Applicable Requirement Determinations)

Attach OP-REQ3 (Applicable Requirements Summary)

Attach OP-PBRSUP (Permits by Rule Supplemental Table)

Attach OP-SUMR (Individual Unit Summary for Revisions)

Attach OP-MON (Monitoring Requirements)

Attach OP-UA (Unit Attribute) Forms

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

Attach OP-CRO2 (Change of Responsible Official Information)

Attach OP-DEL (Delegation of Responsible Official)

Attach Void Request Form

Attach any other necessary information needed to complete the permit.

[File Properties]

File Name

2025-12-17_OP-CRO1_O2203.pdf

Hash

8AA8AC5F1153EF7A6AFB97C06570336CB0175005ED543C800676D31DF7F66004

MIME-Type

application/pdf

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

Certification

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

1. I am Fran Q Falcon, the owner of the STEERS account ER028176.
2. I have the authority to sign this data on behalf of the applicant named above.

3. I have personally examined the foregoing and am familiar with its content and the content of any attachments, and based upon my personal knowledge and/or inquiry of any individual responsible for information contained herein, that this information is true, accurate, and complete.
4. I further certify that I have not violated any term in my TCEQ STEERS participation agreement and that I have no reason to believe that the confidentiality or use of my password has been compromised at any time.
5. I understand that use of my password constitutes an electronic signature legally equivalent to my written signature.
6. I also understand that the attestations of fact contained herein pertain to the implementation, oversight and enforcement of a state and/or federal environmental program and must be true and complete to the best of my knowledge.
7. I am aware that criminal penalties may be imposed for statements or omissions that I know or have reason to believe are untrue or misleading.
8. I am knowingly and intentionally signing Title V Existing 2203.
9. My signature indicates that I am in agreement with the information on this form, and authorize its submittal to the TCEC

OWNER OPERATOR Signature: Fran Q Falcon OWNER OPERATOR

Account Number:	ER028176
Signature IP Address:	170.85.99.14
Signature Date:	2025-12-17
Signature Hash:	47028DDAF3697FA5C70F77C16A06E50F53CC1EEEEAEF487D89AB53CE34D67B713
Form Hash Code at time of Signature:	B9FCE5DCAE27D67CA326442E69F243DFA2B9DBEFBB377BE90C2B5A64BA085C7B

Submission

Reference Number:	The application reference number is 868011
Submitted by:	The application was submitted by ER028176/Fran Q Falcon
Submitted Timestamp:	The application was submitted on 2025-12-17 at 15:29:53 CST
Submitted From:	The application was submitted from IP address 170.85.99.14
Confirmation Number:	The confirmation number is 716322
Steers Version:	The STEERS version is 6.93
Permit Number:	The permit number is 2203

Additional Information

Application Creator: This account was created by Crystal Schmidt

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

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

I. Identifying Information
RN: RN100225945
CN: CN600356976
Account No.: BL-0082-R
Permit No.: O2203
Project No.: 39097
Area Name: Chemicals & Metals (3)
Company Name: The Dow Chemical Company
II. Certification Type <i>(Please mark appropriate box)</i>
<input type="checkbox"/> Responsible Official Representative <input checked="" type="checkbox"/> Duly Authorized Representative
III. Submittal Type <i>(Please mark appropriate box) (Only one response can be accepted per form)</i>
<input type="checkbox"/> SOP/TOP Initial Permit Application <input type="checkbox"/> Permit Revision, Renewal, or Reopening
<input type="checkbox"/> GOP Initial Permit Application <input type="checkbox"/> Update to Permit Application
<input checked="" type="checkbox"/> Other: <u>Working Draft Permit Certification</u>

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

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

IV. Certification of Truth
This certification does not extend to information which is designated by TCEQ as information for reference only.
<p>I, <u>Fran Falcon</u> certify that I am the <u>DAR</u></p> <p style="text-align: center;"><i>(Certifier Name printed or typed)</i> <i>(RO or DAR)</i></p> <p>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></p>
<p>Time Period: From <u>November 5, 2025</u> to <u>December 17, 2025</u></p> <p style="text-align: center;"><i>(Start Date)</i> <i>(End Date)</i></p>
<p>Specific Dates: _____</p> <p style="text-align: center;"><i>(Date 1)</i> <i>(Date 2)</i> <i>(Date 3)</i> <i>(Date 4)</i></p>
<p>_____</p> <p style="text-align: center;"><i>(Date 5)</i> <i>(Date 6)</i></p>
<p>Signature: _____ Signature Date: <u>December 17, 2025</u></p>
<p>Title: <u>Texas Regional Environmental Leader</u></p>

From: Schmidt, Crystal (C) <cschmidt6@dow.com>
Sent: Friday, December 12, 2025 2:24 PM
To: Tusar Swami
Subject: RE: Working Draft Permit -- FOP O2203/Project 39097, The Dow Chemical Company/Dow Texas Operations Freeport - Respond by 12/12/2025
Attachments: 2025-12-12_WDP_Response_O2203.pdf
Follow Up Flag: Follow up
Flag Status: Flagged

Tusar,

Please see our attached response. I will work on getting you an OP-CRO1 via STEERS early next week. Thanks!

Crystal Schmidt

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



Seek Together™

General Business

From: Tusar Swami <tusar.swami@tceq.texas.gov>
Sent: Thursday, December 4, 2025 4:06 PM
To: Schmidt, Crystal (C) <cschmidt6@dow.com>
Subject: RE: Working Draft Permit -- FOP O2203/Project 39097, The Dow Chemical Company/Dow Texas Operations Freeport - Respond by 12/12/2025

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

Crystal:

Please see the updated draft. Added the new revision items. Please let me know if you accept the draft by 12/12. Please certify the new information for the via OP-CRO1 for the



December 12, 2025

E-MAIL RESPONSE

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

The Dow Chemical Company, CN600356976
Chemicals & Metals (3), RN100225945
Title V Operating Permit WDP Response for Chemicals & Metals 3, O2203
TCEQ Project Number: 39097

Dear Mr. Swami,

The Dow Chemical Company (Dow) is providing comments on the Working Draft Permit provided on December 4, 2025. Dow is also requesting one revision with this submittal. Please see the Form OP-2 for more information.

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

Sincerely,

Crystal Schmidt

Crystal Schmidt
Air Permit Manager

enclosure

cc:

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

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

Working Draft Permit Comments

Unit Summary

1. B75POF1; B76POST002; B76POST003: Please update the 40 CFR Part 63, Subpart PPP SOP Index No. from “63PPP” to “63PPP-01”.

Applicable Requirements Summary

1. B75POF1; B76POST002; B76POST003: Please update the 40 CFR Part 63, Subpart PPP SOP Index No. from “63PPP” to “63PPP-01”.

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

Date: December 12, 2025
Permit No.: O2203
Regulated Entity No.: RN100225945
Company Name: The Dow Chemical Company

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	B13GBST222	OP-SUMR	N/A	Please update the Emission Unit Name/Description from “D-1222 TPG STORAGE TANK” to “D-1222 MPG TANK”.

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

Date	Permit No.	Regulated Entity No.
December 12, 2025	O2203	RN100225945

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
	1	B13GBST222	<i>OP-UA1</i> OP-UA3	<i>D-1222 MPG STORAGE TANK</i> D-1222 TPG STORAGE TANK		4031	

duration 11/05/2025 through the current date. I will be out of office 12/15-12/26. Will take it up in January 2026.

Sincerely,

Tusar Swami, P.E.

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

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



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

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

Sent: Thursday, December 4, 2025 11:22 AM

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

Subject: RE: Working Draft Permit -- FOP O2203/Project 39097, The Dow Chemical Company/Dow Texas Operations Freeport - Respond by 11/18/2025

Tusar,

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

I was informed that the shutdown will not be complete until second quarter of next year, so we will submit another minor revision at that time. I do have one more revision requested in this submittal.

Crystal Schmidt

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



Seek Together™

General Business



December 4, 2025

E-MAIL RESPONSE

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

The Dow Chemical Company, CN600356976
Chemicals & Metals (3), RN100225945
Title V Operating Permit WDP Response for Chemicals & Metals 3, O2203
TCEQ Project Number: 39097

Dear Mr. Swami,

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

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

Sincerely,

Crystal Schmidt

Crystal Schmidt
Air Permit Manager

enclosure

cc:

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

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

Working Draft Permit Comments

Special Terms & Conditions (ST&C)

1. Please remove ST&C 17.E and 17.F; these conditions are blank.

Unit Summary

1. B54EOCL1: Please change the Unit Type from “FUGITIVE EMISSION UNITS” to “LOADING/UNLOADING OPERATIONS”.

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

Date: December 4, 2025
Permit No.: O2203
Regulated Entity No.: RN100225945
Company Name: The Dow Chemical Company

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	B75POF1 B76POST002 B76POST003	OP-UA1	N/A	Please add 40 CFR Part 63, Subpart PPP General High-Level applicability to these listed units.

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

Date	Permit No.	Regulated Entity No.
December 4, 2025	O2221	RN100225945

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
	1	B75POF1	<i>OP-UA1</i> OP-UA7	PROPYLENE OXIDE FINISHING FLARE		4031	
	1	B76POST002	<i>OP-UA1</i> OP-UA3	TANK STORAGE B76, V-7002		4031	
	1	B76POST003	<i>OP-UA1</i> OP-UA3	V-7003 STORAGE TANK		4031	

**Miscellaneous and Generic Unit Attributes
Form OP-UA1
Federal Operating Permit Program
Texas Commission on Environmental Quality**

Table 1

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
B75POF1	63PPP-01	EU				Please add 40 CFR Part 63, Subpart PPP General High-Level applicability to this unit.
B76POST002	63PPP-01	EU				Please add 40 CFR Part 63, Subpart PPP General High-Level applicability to this unit.
B76POST003	63PPP-01	EU				Please add 40 CFR Part 63, Subpart PPP General High-Level applicability to this unit.

[Go to the Table of Contents](#)



Seek Together™

General Business

From: Tusar Swami <tusar.swami@tceq.texas.gov>
Sent: Wednesday, November 19, 2025 2:40 PM
To: Schmidt, Crystal (C) <cschmidt6@dow.com>
Subject: RE: Working Draft Permit -- FOP O2203/Project 39097, The Dow Chemical Company/Dow Texas Operations Freeport - Respond by 11/18/2025

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

Good afternoon, Crystal:

We can wait till 1/15/2026. Looks like associated NSR permits may be affected. Please let us know if and when you are planning to void or amend some of the NSR permits.

Sincerely,

Tusar Swami, P.E.

Texas Commission on Environmental Quality

OA/APD/Operating Permits Section

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

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

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

Email: tusar.swami@tceq.texas.gov



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

From: Schmidt, Crystal (C) <cschmidt6@dow.com>
Sent: Monday, November 17, 2025 9:02 PM
To: Tusar Swami <tusar.swami@tceq.texas.gov>
Subject: RE: Working Draft Permit -- FOP O2203/Project 39097, The Dow Chemical Company/Dow Texas Operations Freeport - Respond by 11/18/2025

Tusar,

I have a question regarding this project. At the end of December, we will be shutting down two units within the O2203 Title V permit. Therefore, we will need to remove all of the B13 units (except B13GBST222 and B13GBST401) and the B75 units (except B75POF1, B75POKO1, and B75POFU1). I

only have two minor comments on the current WDP, so you could finish this project soon. Is there any way we can delay the Public Announcement for this project until the units shut down? Or would you rather go ahead and wrap this project up and have us submit another minor revision? I know we have had this permit open since 2022 with various projects, so I wanted to check with you to see what you prefer.

Please let me know if you have any questions. Thanks!

Crystal Schmidt

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



Seek Together™

General Business

From: Tusar Swami <tusar.swami@tceq.texas.gov>
Sent: Wednesday, November 5, 2025 5:34 PM
To: Schmidt, Crystal (C) <cschmidt6@dow.com>
Subject: Working Draft Permit -- FOP O2203/Project 39097, The Dow Chemical Company/Dow Texas Operations Freeport - Respond by 11/18/2025

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Crystal:

I have conducted a technical review of *revision* application for The Dow Chemical Company/Dow Texas Operations Freeport, *Chemicals & Metals (3)*. An electronic copy of the Working Draft Permit (WDP) is attached for your review. This WDP contains the TCEQ determination of applicable requirements based on the information submitted in your application dated September 29, 2025, and any updates provided.

Please review the WDP and submit to me any comments you have on the working draft permit by **November 18, 2025**.

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

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

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

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

Please notify me when these updates have been submitted.

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

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

Sincerely,

Tusar Swami, P.E.

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

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

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

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

Email: tusar.swami@tceq.texas.gov

From: Tusar Swami
Sent: Wednesday, November 19, 2025 2:40 PM
To: Schmidt, Crystal (C)
Subject: RE: Working Draft Permit -- FOP O2203/Project 39097, The Dow Chemical Company/Dow Texas Operations Freeport - Respond by 11/18/2025

Follow Up Flag: Follow up
Flag Status: Completed

Good afternoon, Crystal:

We can wait till 1/15/2026. Looks like associated NSR permits may be affected. Please let us know if and when you are planning to void or amend some of the NSR permits.

Sincerely,

Tusar Swami, P. E.

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

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



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From: Schmidt, Crystal (C) <cschmidt6@dow.com>
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Subject: RE: Working Draft Permit -- FOP O2203/Project 39097, The Dow Chemical Company/Dow Texas Operations Freeport - Respond by 11/18/2025

Tusar,

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Please let me know if you have any questions. Thanks!

Crystal Schmidt

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



General Business

From: Tusar Swami <tusar.swami@tceq.texas.gov>
Sent: Wednesday, November 5, 2025 5:34 PM
To: Schmidt, Crystal (C) <cschmidt6@dow.com>
Subject: Working Draft Permit -- FOP O2203/Project 39097, The Dow Chemical Company/Dow Texas Operations Freeport - Respond by 11/18/2025

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

Crystal:

I have conducted a technical review of *revision* application for The Dow Chemical Company/Dow Texas Operations Freeport, *Chemicals & Metals (3)*. An electronic copy of the Working Draft Permit (WDP) is attached for your review. This WDP contains the TCEQ determination of applicable requirements based on the information submitted in your application dated September 29, 2025, and any updates provided.

Please review the WDP and submit to me any comments you have on the working draft permit by **November 18, 2025**.

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

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

Note that a Certification by Responsible Official (Form OP-CRO1) for any uncertified application information, including application updates supporting the WDP comments, is

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

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

Please notify me when these updates have been submitted.

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

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

Sincerely,

Tusar Swami, P.E.

Texas Commission on Environmental Quality

OA/APD/Operating Permits Section

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

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

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

Email: tusar.swami@tceq.texas.gov



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

From: Tusar Swami
Sent: Thursday, October 16, 2025 10:13 AM
To: Schmidt, Crystal (C)
Subject: Technical Review -- FOP O2203/Project 39097, The Dow Chemical Company/Dow Texas Operations Freeport

Crystal:

Good morning. I have been assigned to the Federal Operating Permit (FOP) Revision application of Permit No. O2203 for The Dow Chemical Company/Dow Texas Operations Freeport/Chemicals & Metals (3). This application has been assigned Project No. 39097. 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_fac

[tsheet.pdf](#). This guidance contains important information regarding the review process and application update procedures. Contact me if you have any questions regarding the guidelines, the project schedule, or any other details regarding your application or permit.

Thank you for your cooperation.

Sincerely,

Tusar Swami, P.E.

Texas Commission on Environmental Quality

OA/APD/Operating Permits Section

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

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

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

Email: tusar.swami@tceq.texas.gov



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Texas Commission on Environmental Quality

Title V Existing

2203

Site Information (Regulated Entity)

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

Customer (Applicant) Information

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

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

Responsible Official Contact

Person TCEQ should contact for questions about this application:

Organization Name	THE DOW CHEMICAL COMPANY
Prefix	MR
First	JOHN
Middle	
Last	SAMPSON
Suffix	
Credentials	
Title	SENIOR VICE PRESIDENT
Enter new address or copy one from list:	
Mailing Address	
Address Type	Domestic
Mailing Address (include Suite or Bldg. here, if applicable)	2301 N BRAZOSPORT BLVD
Routing (such as Mail Code, Dept., or Attn:)	
City	FREEPORT
State	TX
ZIP	77541
Phone (###-###-####)	9792389978
Extension	
Alternate Phone (###-###-####)	
Fax (###-###-####)	9792358116
E-mail	txles@dow.com

Duly Authorized Representative Contact

Person TCEQ should contact for questions about this application

Select existing DAR contact or enter a new contact.

Organization Name	FRAN FALCON(THE DOW CHEMICA...)
Prefix	THE DOW CHEMICAL COMPANY
First	MS
Middle	FRAN
Last	FALCON
Suffix	
Credentials	
Title	EH&S REGIONAL LEVERAGED DELIVERY DIRECTOR
Enter new address or copy one from list	
Mailing Address	
Address Type	Domestic

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

2101 N BRAZOSPORT BLVD

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

City

FREEPORT

State

TX

Zip

77541

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

9792389764

Extension

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

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

9792380317

E-mail

FQFalcon@dow.com

Technical Contact

Person TCEQ should contact for questions about this application:

Select existing TC contact or enter a new contact.

CRYSTAL SCHMIDT(THE DOW CHEMICA...)

Organization Name

THE DOW CHEMICAL COMPANY

Prefix

MRS

First

CRYSTAL

Middle

Last

SCHMIDT

Suffix

Credentials

Title

AIR PERMIT MANAGER

Enter new address or copy one from list:

Mailing Address

Address Type

Domestic

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

332 HIGHWAY 332 E

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

City

LAKE JACKSON

State

TX

ZIP

77566

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

9792381742

Extension

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

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

E-mail

cschmidt6@dow.com

Title V General Information - Existing

1) Permit Type:

SOP

2) Permit Latitude Coordinate:

29 Deg 24 Min 45 Sec

3) Permit Longitude Coordinate:

95 Deg 56 Min 41 Sec

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

New Application

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

Streamlined Revision

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

No

through permit conversion?

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

No

5) Who will electronically sign this Title V application?

Duly Authorized Representative

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

No

Title V Attachments Existing

Attach OP-1 (Site Information Summary)

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

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

Attach OP-REQ2 (Negative Applicable Requirement Determinations)

Attach OP-REQ3 (Applicable Requirements Summary)

Attach OP-PBRSUP (Permits by Rule Supplemental Table)

Attach OP-SUMR (Individual Unit Summary for Revisions)

Attach OP-MON (Monitoring Requirements)

Attach OP-UA (Unit Attribute) Forms

[File Properties]

File Name

</ePermitsExternal/faces/file?fileId=285395>>Form_OP-UA12_Fugitives.xlsx

Hash

F835E562DADE038502F035C6A23CFD5F57C629FC102DCBE05C940C0A86659CC6

MIME-Type

application/vnd.openxmlformats-officedocument.spreadsheetml.sheet

[File Properties]

File Name

</ePermitsExternal/faces/file?fileId=285394>>Form_OP-UA4_Transfer_Racks.xlsx

Hash

03A9EECB4A8A3DD1C9270568AD791ABCD45926F3A5E7A20858F811C73FD9271

MIME-Type

application/vnd.openxmlformats-officedocument.spreadsheetml.sheet

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

Attach OP-CRO2 (Change of Responsible Official Information)

Attach OP-DEL (Delegation of Responsible Official)

Attach any other necessary information needed to complete the permit.

[File Properties]

File Name	2025-09-29_Minor_Revision_O2203.pdf
Hash	DAE7E3646FBC7781E9405A56443B5FEE2A7022255409893EE48A4FADD08E47AE
MIME-Type	application/pdf

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

Expedite Title V

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

Certification

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

1. I am Fran Q Falcon, the owner of the STEERS account ER028176.
2. I have the authority to sign this data on behalf of the applicant named above.
3. I have personally examined the foregoing and am familiar with its content and the content of any attachments, and based upon my personal knowledge and/or inquiry of any individual responsible for information contained herein, that this information is true, accurate, and complete.
4. I further certify that I have not violated any term in my TCEQ STEERS participation agreement and that I have no reason to believe that the confidentiality or use of my password has been compromised at any time.
5. I understand that use of my password constitutes an electronic signature legally equivalent to my written signature.
6. I also understand that the attestations of fact contained herein pertain to the implementation, oversight and enforcement of a state and/or federal environmental program and must be true and complete to the best of my knowledge.
7. I am aware that criminal penalties may be imposed for statements or omissions that I know or have reason to believe are untrue or misleading.
8. I am knowingly and intentionally signing Title V Existing 2203.
9. My signature indicates that I am in agreement with the information on this form, and authorize its submittal to the TCEC

OWNER OPERATOR Signature: Fran Q Falcon OWNER OPERATOR

Account Number:	ER028176
Signature IP Address:	136.226.100.182
Signature Date:	2025-09-30
Signature Hash:	47028DDAF3697FA5C70F77C16A06E50F53CC1EEEEAEF487D89AB53CE34D67B713
Form Hash Code at time of Signature:	3DDADE67C7D32E4136BE14EF6B4ABD55AA4B6A57C6D0AF1B0D6DD5E6C7D107B5

Submission

Reference Number:	The application reference number is 821827
Submitted by:	The application was submitted by ER028176/Fran Q Falcon
Submitted Timestamp:	The application was submitted on 2025-09-30 at 13:04:42 CDT
Submitted From:	The application was submitted from IP address 136.226.100.182
Confirmation Number:	The confirmation number is 681746
Steers Version:	The STEERS version is 6.93

Permit Number:

The permit number is 2203

Additional Information

Application Creator: This account was created by Crystal Schmidt



September 29, 2025

Electronic Submittal via ePermits

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

The Dow Chemical Company, CN600356976
Dow Texas Operations, RN100225945
Chemicals & Metals (3) – Title V Operating Permit O2203
Permit Minor Revision Application

To Whom it May Concern,

The Dow Chemical Company is submitting the Title V Operating Permit O2203 Minor Revision Application for the Chemicals & Metals (3) facility located in Brazoria County, Texas in accordance with 30 TAC Chapter 122, Subchapter, C §122.215, §122.216, and §122.217.

For future correspondence regarding this minor revision application, I can be contacted at (979) 238-1742 or cschmidt6@dow.com.

Sincerely,

Crystal Schmidt

Crystal Schmidt
Air Permit Manager

enclosure

cc:

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

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

Federal Operating Permit Program
Form OP-2 – Application for Permit Revision/Renewal
Table 1

Date: September 29, 2025	
Permit No.: O2203	
Regulated Entity No.: RN100225945	
Company Name: The Dow Chemical Company	
For Submissions to EPA	
Has an electronic copy of this application been submitted (or is being submitted) to EPA? <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
Form OP-2 – Application for Permit Revision/Renewal
Table 1 (continued)

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: <i>(Check the appropriate box[es].)</i>						
<input checked="" type="checkbox"/> VOC	<input checked="" type="checkbox"/> NO _x	<input checked="" type="checkbox"/> SO ₂	<input checked="" type="checkbox"/> PM ₁₀	<input checked="" type="checkbox"/> CO	<input type="checkbox"/> Pb	<input checked="" type="checkbox"/> 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)?						<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO <input type="checkbox"/> N/A
V. Delinquent Fees and Penalties						
Notice: This form will not be processed until all delinquent fees and/or penalties owed to the TCEQ or the Office of the Attorney General on behalf of the TCEQ are paid in accordance with the Delinquent Fee and penalty protocol.						

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

Date:		September 29, 2025				
Permit No.:		O2203				
Regulated Entity No.:		RN100225945				
Company Name:		The Dow Chemical Company				
I. Description of Revision						
Revision No.	Revision Code	Unit/Group Process			NSR Authorization	Description of change and Provisional Terms and Conditions
		New Unit	ID No.	Applicable Form		
1	MS-C	YES	B76PDCL1	OP-SUMR OP-UA4 OP-PBRSUP	N/A	Please add this new transfer rack to the Title V Permit. Please add 30 TAC Chapter 115, Loading and Unloading of VOC positive applicability to this transfer rack.
2	MS-C	YES	B76PDFU3	OP-SUMR OP-UA12 OP-PBRSUP	N/A	Please add this new fugitive ID to the Title V Permit. Please add 30 TAC Chapter 115, Pet. Refinery & Petrochemicals and 30 TAC Chapter 115, HRVOC Fugitive Emissions positive applicability to this fugitive ID.
3	MS-C	NO	Multiple	OP-SUMR OP-PBRSUP	N/A	Please update the PBR Supplemental Table to include any changes that have been made since the permit was last revised in September 2025 (Project #37189). Please update the authorizations for these units on the Form OP-SUMR to match the PBR Supplemental Table.

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

Date	Permit No.	Regulated Entity No.
September 29, 2025	O2203	RN100225945

Unit/Process						Preconstruction Authorizations	
AI	Revision No.	ID No.	Applicable Form	Name/ Description	CAM	30 TAC Chapter 116/ 30 TAC Chapter 106	Title I
A	1	<i>B76PDCL1</i>	<i>OP-UA4</i>	<i>PROPYLENE RAILCAR LOADING</i>		<i>106.261/11/01/2003 [180314]</i>	
A	1	<i>B76PDFU3</i>	<i>OP-UA12</i>	<i>PROPYLENE LOADING FUGITIVES</i>		<i>106.261/11/01/2003 [180314]</i>	

**Loading/Unloading Operations Attributes – Form OP-UA4 (Page 1)
Federal Operating Permit Program**

**Table 1a: Title 30 Texas Administrative Code Chapter 115 (30 TAC Chapter 115)
Subchapter C: Loading and Unloading of Volatile Organic Compounds**

Date	Permit No.	Regulated Entity No.
September 29, 2025	O2203	RN100225945

Unit ID No.	SOP/GOP Index No.	Chapter 115 Facility Type	Alternate Control Requirement (ACR)	ACR ID No.	Product Transferred	Transfer Type	True Vapor Pressure	Daily Through-put	Control Options
<i>B76PDCL1</i>	<i>R5211-01</i>	<i>OTHER</i>	<i>213B</i>		<i>VOCI</i>	<i>LOAD</i>	<i>11+</i>	<i>NCEI</i>	<i>CON</i>

Loading/Unloading Operations Attributes – Form OP-UA4 (Page 2)
Federal Operating Permit Program

Table 1b: Title 30 Texas Administrative Code Chapter 115 (30 TAC Chapter 115)
Subchapter C: Loading and Unloading of Volatile Organic Compounds

Date	Permit No.	Regulated Entity No.
September 29, 2025	O2203	RN100225945

Unit ID No.	SOP Index No.	Chapter 115 Control Device Type	Chapter 115 Control Device ID No.	Vapor-Tight	Vapor Space Holding Tank	Marine Terminal Exemptions	VOC Flash Point	Uncontrolled VOC Emissions
<i>B76PDCL1</i>	<i>R5211-01</i>	<i>FLARE</i>	<i>B70PDF801</i>	<i>YES</i>				

Fugitive Emission Unit Attributes – Form OP-UA12 (Page 11)
Federal Operating Permit Program

Table 2a: Title 30 Texas Administrative Code Chapter 115 (30 TAC Chapter 115)
Subchapter D, Division 3: Fugitive Emission Control in Petroleum Refining, Natural Gas/Gasoline Processing, and Petrochemical Processes in Ozone Nonattainment Areas

Date	Permit No.	Regulated Entity No.
September 29, 2025	O2203	RN100225945

Unit ID No.	SOP/GOP Index No.	Title 30 TAC § 115.352 Applicable	< 250 Components at Site	Weight Percent VOC	Reciprocating Compressors or Positive Displacement Pumps
<i>B76PDFU3</i>	<i>R5352-ALL</i>				

Fugitive Emission Unit Attributes – Form OP-UA12 (Page 11)
Federal Operating Permit Program

Table 16a: Title 30 Texas Administrative Code Chapter 115 (30 TAC Chapter 115)
Subchapter H: HRVOC, Division 3: Fugitive Emissions

Date	Permit No.	Regulated Entity No.
September 29, 2025	O2203	RN100225945

Unit ID. No.	SOP/GOP Index No.	Title 30 TAC § 115.780 Applicable	Less Than 250 Components at Site	Weight Percent HRVOC	Title 30 TAC Chapter 115 Fugitive Unit Components		
					Pumps with Shaft Seal System	Compressors with Shaft Seal System	Agitators with Shaft Seal System
<i>B76PDFU3</i>	<i>R5780-ALL</i>						

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

Date: September 29, 2025	Regulated Entity No.: RN100225945	Permit No.: O2203
Company Name: The Dow Chemical Company	Area Name: Chemicals & Metals (3)	

Revision No.	Unit/Group/Process ID No.	Unit/Group/Process Applicable Form	SOP/GOP Index No	Pollutant	Applicable Regulatory Requirement Name	Applicable Regulatory Requirement Standard(s)
1	<i>B76PDCL1</i>	<i>OP-UA4</i>	<i>R5211-01</i>	<i>VOC</i>	<i>30 TAC Chapter 115, Loading and Unloading of VOC</i>	<i>115.213(b), 115.212(a)(3)(A), 115.212(a)(3)(A)(i), (3)(B), [G](a)(3)(C), 115.212(a)(3)(E), 115.213(b)(1), 115.213(b)(4)-(5), (b)(5)(B), [G](b)(6), 115.214(a)(1)(B)-(D), (a)(1)(D)(ii), 60.18</i>
2	<i>B76PDFU3</i>	<i>OP-UA12</i>	<i>R5352-ALL</i>	<i>VOC</i>	<i>30 TAC Chapter 115, Pet. Refinery & Petrochemicals</i>	<i>ALL</i>
2	<i>B76PDFU2</i>	<i>OP-UA12</i>	<i>R5780-ALL</i>	<i>HRVOC</i>	<i>30 TAC Chapter 115, HRVOC Fugitive Emissions</i>	<i>ALL</i>

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

Date: September 29, 2025	Regulated Entity No.: RN100225945	Permit No.: O2203
Company Name: The Dow Chemical Company	Area Name: Chemicals & Metals (3)	

Revision No.	Unit/Group/Process ID No.	SOP/GOP Index No.	Pollutant	Monitoring and Testing Requirements	Recordkeeping Requirements	Reporting Requirements
1	<i>B76PDCL1</i>	<i>R5211-01</i>	<i>VOC</i>	<i>115.212(a)(3)(B), 115.213(b), 115.213(b)(1), 115.214(a)(1)(A), 115.214(a)(1)(A)(i)-(iii), 115.215, (1), [G](2)-(3), (4), 115.215(9)-(10), 115.216(1)</i>	<i>115.213(b)(1), 115.216, (1), (1)(B), 115.216(2), (3)(A), (3)(A)(i)-(iii), 115.216(3)(B)</i>	<i>115.213(b)(1)-(4)</i>
2	<i>B76PDFU3</i>	<i>R5352-ALL</i>	<i>VOC</i>	<i>ALL</i>	<i>ALL</i>	<i>ALL</i>
2	<i>B76PDFU2</i>	<i>R5780-ALL</i>	<i>HRVOC</i>	<i>ALL</i>	<i>ALL</i>	<i>ALL</i>

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 29, 2025	O2203	RN100225945

Unit ID No.	Registration No.	PBR No.	Registration Date
B54EOFU2	134008	106.262	08/21/2015
B54EOFU2	161293	106.262	05/22/2020
B76POFU1	135709	106.262	10/26/2015
B76POFU1	149239	106.373	11/07/2017
B76POFU1	165221	106.261 106.262	06/25/2021
OC3ST78	143752	106.264	11/30/2016
OC3ST78	148119	106.262	09/06/2017
OC9DOLRRR OC9DOLRTRK	144045	106.472	01/04/2017
OC3DOFU10	146074	106.262	04/14/2017
OC3DOFU10	154299	106.262	01/04/2019
OC3T01	168623	106.264	05/13/2022
B23G2FU2	160149	106.262	03/05/2020
B23G2FU2	167918	106.261	02/16/2022
B23G2FU2	168532	106.261 106.262	04/04/2022

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

Date	Permit Number	Regulated Entity Number
September 29, 2025	O2203	RN100225945

Unit ID No.	Registration No.	PBR No.	Registration Date
B19G1FU7	146713	106.262	06/08/2017
B19G1GU1	170108	106.262	09/22/2022
B19G1GU1	170612	106.261	10/20/2022
B75POFU1	139422	106.262	06/01/2016
B75POFU1	143462	106.262	10/28/2016
B75POFU1	146981	106.261 106.262	06/20/2017
B75POFU1	150103	106.262	03/06/2018
B13GBFU3 B13GBDL1	146226	106.261	04/21/2017
B75POCT75	148707	106.371	09/26/2017
B13GBFU3 B13GBFU4 B75POFU1	150804	106.261 106.262	04/06/2018
B13GBFU4	153453	106.262	10/24/2018
B75POFU3	154150	106.261 106.262	01/11/2019
B13GBFU4	157864	106.262	08/08/2019

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

Date	Permit Number	Regulated Entity Number
September 29, 2025	O2203	RN100225945

Unit ID No.	Registration No.	PBR No.	Registration Date
B75POFU3	159158	106.261 106.262	11/21/2019
B75POFU1	163416	106.262	12/08/2020
B13GBFU3	169541	106.261	07/11/2022
B68PDFU1	140145	106.262	06/07/2016
B68PDFU1	142146	106.262	09/02/2016
B68PDFU1 B70ALF801	146077	106.261	05/24/2017
B68PDFU1	147119	106.261	06/29/2017
B68PDFU1	149654	106.261 106.262	01/11/2018
B68PDFU1	152956	106.261 106.262	08/20/2018
B68PDFU1	157525	106.261	07/12/2019
B68PDFU1	158921	106.262	11/05/2019
B68PDFU1	161234	106.262	05/21/2020
B68PDFU1	163005	106.261 106.262	10/26/2020

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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 29, 2025	O2203	RN100225945

Unit ID No.	Registration No.	PBR No.	Registration Date
B68PDFU1	165160	106.261 106.262	06/03/2021
B68PDFU1	165480	106.261 106.262	07/20/2021
B68PDFU1	167230	106.261	12/17/2021
B68PDFU1	168015	106.262	03/16/2022
B68PDFU1	170892	106.261 106.262	11/18/2022
B13GBPU307 B30POST3001	133449	106.472	07/21/2015
<i>B76PDCL1</i> <i>P76PDFU3</i>	<i>180314</i>	<i>106.261</i>	<i>06/06/2025</i>

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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 29, 2025	O2203	RN100225945

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

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

Date	Permit Number	Regulated Entity Number
September 29, 2025	O2203	RN100225945

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

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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 29, 2025	O2203	RN100225945

Unit ID No.	PBR No.	Version No./Date Or Registration No.	Monitoring Requirement
B54EOFU2	106.373	09/04/2000	Maintain records of additions to refrigeration system
B19CT490	106.371	09/04/2000	The plant's cooling water shall be sampled daily for conductivity; results shall be used to demonstrate compliance with the representation in the June 30, 2013 application
B54EOFU2	106.262	134008	New piping components are managed in accordance with the current Leak Detection and Repair (LDAR) fugitive monitoring program 28MID as required by NSR 112341 SC #5 (Permit issue Date January 7, 2016)
B54EOFU2	106.262	161293	New piping components are managed in accordance with the current Leak Detection and Repair (LDAR) fugitive monitoring program 28MID as required by NSR 112341 SC #5 (Permit issue Date January 7, 2016)
B76POFU1	106.262	135709	New piping components are managed in accordance with the current Leak Detection and Repair (LDAR) fugitive monitoring program 28VHP as required by NSR 4031 SC # 15 (Permit Issue Date January 22, 2020)
B76POFU1	106.373	149239	Maintain records of additions to refrigeration system
B76POFU1	106.261 106.262	165221	New piping components are managed in accordance with the current Leak Detection and Repair (LDAR) fugitive monitoring program 28VHP as required by NSR 4031 SC # 15 (Permit Issue Date January 22, 2020)
OC3ST78	106.264	143752	Maintain records of tanks service and annual throughput.
OC3ST78	106.262	148119	Maintain records of tanks service and annual throughput.
OC9DOLRRR OC9DOLRTRK	106.472	144045	Maintain records of no visible emissions; maintain records of leak-tight testing.
OC3DOFU10	106.262	146074	New piping components are managed in accordance with the current Leak Detection and Repair (LDAR) fugitive monitoring program 28PI as required by NSR 28363 SC #13 (Permit Issue Date October 4, 2016)

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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 29, 2025	O2203	RN100225945

Unit ID No.	PBR No.	Version No./Date Or Registration No.	Monitoring Requirement
OC3DOFU10	106.262	154299	New piping components are managed in accordance with the current Leak Detection and Repair (LDAR) fugitive monitoring program 28PI as required by NSR 28363 SC #13 (Permit Issue Date October 4, 2016)
OC3T01	106.264	168623	Must operate at 99.9 % DRE or maintain the VOC concentration in the exhaust gas less than 10 ppmv on a dry basis corrected to 3% O2
B23G2FU2	106.262	160149	New piping components are managed in accordance with the current Leak Detection and Repair (LDAR) fugitive monitoring program 28MID and 28CNTA as required by NSR 147470 SC #10 and #11 (Permit Issue Date July 24, 2019)
B23G2FU2	106.261	167918	New piping components are managed in accordance with the current Leak Detection and Repair (LDAR) fugitive monitoring program 28MID and 28CNTA as required by NSR 147470 SC #10 and #11 (Permit Issue Date July 24, 2019)
B23G2FU2	106.261 106.262	168532	New piping components are managed in accordance with the current Leak Detection and Repair (LDAR) fugitive monitoring program 28MID and 28CNTA as required by NSR 147470 SC #10 and #11 (Permit Issue Date July 24, 2019)
B19G1FU7	106.262	146713	New piping components are managed in accordance with the current Leak Detection and Repair (LDAR) fugitive monitoring program 28VHP and 28CNTA as required by NSR 147473 SC #10 and #11 (Permit Issue Date October 7, 2019)
B19G1GU1	106.262	170108	New piping components are managed in accordance with the current Leak Detection and Repair (LDAR) fugitive monitoring program 28VHP and 28CNTA as required by NSR 147473 SC #10 and #11 (Permit Issue Date October 7, 2019)
B19G1GU1	106.261	170612	New piping components are managed in accordance with the current Leak Detection and Repair (LDAR) fugitive monitoring program 28VHP and 28CNTA as required by NSR 147473 SC #10 and #11 (Permit Issue Date October 7, 2019)
B75POFU1	106.262	139422	New piping components are managed in accordance with the current Leak Detection and Repair (LDAR) fugitive monitoring program 28VHP as required by NSR 4031 SC # 15 (Permit Issue Date January 22, 2020)

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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 29, 2025	O2203	RN100225945

Unit ID No.	PBR No.	Version No./Date Or Registration No.	Monitoring Requirement
B75POFU1	106.262	143462	New piping components are managed in accordance with the current Leak Detection and Repair (LDAR) fugitive monitoring program 28VHP as required by NSR 4031 SC # 15 (Permit Issue Date January 22, 2020)
B75POFU1	106.261 106.262	146981	New piping components are managed in accordance with the current Leak Detection and Repair (LDAR) fugitive monitoring program 28VHP as required by NSR 4031 SC # 15 (Permit Issue Date January 22, 2020)
B75POFU1	106.262	150103	New piping components are managed in accordance with the current Leak Detection and Repair (LDAR) fugitive monitoring program 28VHP as required by NSR 4031 SC # 15 (Permit Issue Date January 22, 2020)
B13GBFU3 B13GBDL1	106.261	146226	New piping components are managed in accordance with the current Leak Detection and Repair (LDAR) fugitive monitoring program 28VHP as required by NSR 4031 SC # 15 (Permit Issue Date January 22, 2020) Maintain records of annual throughput
B75POCT75	106.371	148707	HRVOC instrumented and monitored CT
B13GBFU3 B13GBFU4 B75POFU1	106.261 106.262	150804	New piping components are managed in accordance with the current Leak Detection and Repair (LDAR) fugitive monitoring program 28VHP as required by NSR 4031 SC # 15 (Permit Issue Date January 22, 2020)
B13GBFU4	106.262	153453	New piping components are managed in accordance with the current Leak Detection and Repair (LDAR) fugitive monitoring program 28VHP as required by NSR 4031 SC # 15 (Permit Issue Date January 22, 2020)
B75POFU3	106.261 106.262	154150	New piping components are managed in accordance with the current Leak Detection and Repair (LDAR) fugitive monitoring program 28VHP as required by NSR 4031 SC # 15 (Permit Issue Date January 22, 2020)

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Texas Commission on Environmental Quality

Date	Permit Number	Regulated Entity Number
September 29, 2025	O2203	RN100225945

Unit ID No.	PBR No.	Version No./Date Or Registration No.	Monitoring Requirement
B13GBFU4	106.262	157864	New piping components are managed in accordance with the current Leak Detection and Repair (LDAR) fugitive monitoring program 28VHP as required by NSR 4031 SC # 15 (Permit Issue Date January 22, 2020)
B75POFU3	106.261 106.262	159158	New piping components are managed in accordance with the current Leak Detection and Repair (LDAR) fugitive monitoring program 28VHP as required by NSR 4031 SC # 15 (Permit Issue Date January 22, 2020)
B75POFU1	106.262	163416	New piping components are managed in accordance with the current Leak Detection and Repair (LDAR) fugitive monitoring program 28VHP as required by NSR 4031 SC # 15 (Permit Issue Date January 22, 2020)
B13GBFU3	106.261	169541	New piping components are managed in accordance with the current Leak Detection and Repair (LDAR) fugitive monitoring program 28VHP as required by NSR 4031 SC # 15 (Permit Issue Date January 22, 2020)
B68PDFU1	106.262	140145	New piping components are managed in accordance with the current Leak Detection and Repair (LDAR) fugitive monitoring program 28MID as required by NSR 147472 SC #11 (Permit issue Date September 16, 2022)
B68PDFU1	106.262	142146	New piping components are managed in accordance with the current Leak Detection and Repair (LDAR) fugitive monitoring program 28MID as required by NSR 147472 SC #11 (Permit issue Date September 16, 2022)
B68PDFU1 B70ALF801	106.261	146077	New piping components are managed in accordance with the current Leak Detection and Repair (LDAR) fugitive monitoring program 28MID as required by NSR 147472 SC #11 (Permit issue Date September 16, 2022) Flare will continue to meet the monitoring and recordkeeping requirements of NSR 147472 SC #8 (Permit issue Date September 16, 2022) for minimum net heating value and exit velocity.

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Texas Commission on Environmental Quality

Date	Permit Number	Regulated Entity Number
September 29, 2025	O2203	RN100225945

Unit ID No.	PBR No.	Version No./Date Or Registration No.	Monitoring Requirement
B68PDFU1	106.261	147119	New piping components are managed in accordance with the current Leak Detection and Repair (LDAR) fugitive monitoring program 28MID as required by NSR 147472 SC #11 (Permit issue Date September 16, 2022)
B68PDFU1	106.261 106.262	149654	New piping components are managed in accordance with the current Leak Detection and Repair (LDAR) fugitive monitoring program 28MID as required by NSR 147472 SC #11 (Permit issue Date September 16, 2022)
B68PDFU1	106.261 106.262	152956	New piping components are managed in accordance with the current Leak Detection and Repair (LDAR) fugitive monitoring program 28MID as required by NSR 147472 SC #11 (Permit issue Date September 16, 2022)
B68PDFU1	106.261	157525	New piping components are managed in accordance with the current Leak Detection and Repair (LDAR) fugitive monitoring program 28MID as required by NSR 147472 SC #11 (Permit issue Date September 16, 2022)
B68PDFU1	106.262	158921	New piping components are managed in accordance with the current Leak Detection and Repair (LDAR) fugitive monitoring program 28MID as required by NSR 147472 SC #11 (Permit issue Date September 16, 2022)
B68PDFU1	106.262	161234	New piping components are managed in accordance with the current Leak Detection and Repair (LDAR) fugitive monitoring program 28MID as required by NSR 147472 SC #11 (Permit issue Date September 16, 2022)
B68PDFU1	106.261 106.262	163005	New piping components are managed in accordance with the current Leak Detection and Repair (LDAR) fugitive monitoring program 28MID as required by NSR 147472 SC #11 (Permit issue Date September 16, 2022)
B68PDFU1	106.261 106.262	165160	New piping components are managed in accordance with the current Leak Detection and Repair (LDAR) fugitive monitoring program 28MID as required by NSR 147472 SC #11 (Permit issue Date September 16, 2022)

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Date	Permit Number	Regulated Entity Number
September 29, 2025	O2203	RN100225945

Unit ID No.	PBR No.	Version No./Date Or Registration No.	Monitoring Requirement
B68PDFU1	106.261 106.262	165480	New piping components are managed in accordance with the current Leak Detection and Repair (LDAR) fugitive monitoring program 28MID as required by NSR 147472 SC #11 (Permit issue Date September 16, 2022)
B68PDFU1	106.261	167230	New piping components are managed in accordance with the current Leak Detection and Repair (LDAR) fugitive monitoring program 28MID as required by NSR 147472 SC #11 (Permit issue Date September 16, 2022)
B68PDFU1	106.262	168015	New piping components are managed in accordance with the current Leak Detection and Repair (LDAR) fugitive monitoring program 28MID as required by NSR 147472 SC #11 (Permit issue Date September 16, 2022)
B68PDFU1	106.261 106.262	170892	New piping components are managed in accordance with the current Leak Detection and Repair (LDAR) fugitive monitoring program 28MID as required by NSR 147472 SC #11 (Permit issue Date September 16, 2022)
B13GBPU307 B30POST3001	106.472	133449	Maintain records of tank contents
<i>B76PDCL1 B76PDFU3</i>	<i>106.261</i>	<i>180314</i>	<i>New piping components are managed in accordance with the current Leak Detection and Repair (LDAR) fugitive monitoring program 28MID as required by NSR 147472 SC #11 (Permit issue Date September 16, 2022)</i>