



November 19, 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
Freeport Energy Center – Title V Operating Permit O2697
Permit Minor Revision Application

To Whom it May Concern,

The Dow Chemical Company is submitting the Title V Operating Permit O2697 Minor Revision Application for the Freeport Energy Center 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
jodie@brazoria-county.com

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

Date:	November 19, 2025					
Permit No.:	O2697					
Regulated Entity No.:	RN100225945					
Company Name:	The Dow Chemical Company					
I. Description of Revision						
Revision No.	Revision Code	Unit/Group Process			NSR Authorization	Description of change and Provisional Terms and Conditions
		New Unit	ID No.	Applicable Form		
1	MS-C	NO	B56FU01	OP-SUMR OP-PBRSUP	N/A	Dow authorized fugitive components by PBR 106.262/11/01/2003, which was received by TCEQ on 06/30/2025. This PBR (Registration No. 180692; Project No. 394883) was issued on 07/22/2025. PBR 106.262 is already included in the permit; therefore, they will not be added to Form OP-REQ1. PBR 106.262 will be added to the authorizations for B56FU01. No applicability changes will occur because of this project. This is being included for completeness purposes only. Please update the PBR Supplemental Table to include this new PBR Registration.
2	MS-C	NO	B56CR96	OP-UA6	N/A	Please add 40 CFR Part 60, Subpart Db positive applicability to this unit.

**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.
November 19, 2025	O2697	RN100225945

Unit/Process						Preconstruction Authorizations	
AI	Revision No.	ID No.	Applicable Form	Name/ Description	CAM	30 TAC Chapter 116/ 30 TAC Chapter 106	Title I
	2	B56CR96	<i>OP-UA6</i> OP-UA15	GT-96 TURBINE/DB-96 DUCT BURNER STACK		46306	PSDTX986 N059
	1	B56FU01	OP-REQ2	PIPING FUGITIVES		46306 <i>106.262/11/01/2003 [180692]</i>	PSDTX986 N059

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

Date: November 19, 2025	Regulated Entity No.: RN100225945	Permit No.: O2697
Company Name: The Dow Chemical Company	Area Name: Freeport Energy Center	

Revision No.	Unit/Group/Process ID No.	Unit/Group/Process Applicable Form	SOP/GOP Index No	Pollutant	Applicable Regulatory Requirement Name	Applicable Regulatory Requirement Standard(s)
2	<i>B56CR96</i>	<i>OP-UA6</i>	<i>60Db-01</i>	<i>SO₂</i>	<i>40 CFR Part 60, Subpart Db</i>	<i>60.40b(a)</i>
2	<i>B56CR96</i>	<i>OP-UA6</i>	<i>60Db-01</i>	<i>PM</i>	<i>40 CFR Part 60, Subpart Db</i>	<i>60.40b(a)</i>
2	<i>B56CR96</i>	<i>OP-UA6</i>	<i>60Db-01</i>	<i>PM (Opacity)</i>	<i>40 CFR Part 60, Subpart Db</i>	<i>60.40b(a)</i>
2	<i>B56CR96</i>	<i>OP-UA6</i>	<i>60Db-01</i>	<i>NO_x</i>	<i>40 CFR Part 60, Subpart Db</i>	<i>60.44b(a)(4)(i), 60.44b(h), (i), 60.46b(a)</i>

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

Date: November 19, 2025	Regulated Entity No.: RN100225945	Permit No.: O2697
Company Name: The Dow Chemical Company	Area Name: Freeport Energy Center	

Revision No.	Unit/Group/Process ID No.	SOP/GOP Index No.	Pollutant	Monitoring and Testing Requirements	Recordkeeping Requirements	Reporting Requirements
2	B56CR96	60Db-01	SO ₂	NONE	[G]60.49b(d), (o)	60.49b(a), (a)(1), (a)(3)
2	B56CR96	60Db-01	PM	NONE	[G]60.49b(d), (o)	60.49b(a), (a)(1), (a)(3)
2	B56CR96	60Db-01	PM (Opacity)	NONE	[G]60.49b(d), (o)	60.49b(a), (a)(1), (a)(3)
2	B56CR96	60Db-01	NO _x	60.46b(c), (f), (f)(2), [G]60.48b(b), 60.48b(c)-(e), [G](e)(2), (e)(3), (f)	[G]60.48b(b), (c), [G]60.49b(g), [G]60.49b(d), (o)	60.49b(a), (a)(1), (a)(3), (b)

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
November 19, 2025	O2697	RN100225945

Unit ID No.	Registration No.	PBR No.	Registration Date
A25SIFU01 B4SIFU01 BM54SIFU01	154810	106.261 106.262	02/21/2019
B4ADFU01	50646	106.477	04/24/2002
B4ADFU01	153945	106.477	10/11/2018
<i>B56FU01</i>	<i>180692</i>	<i>106.262</i>	<i>07/22/2025</i>

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
November 19, 2025	O2697	RN100225945

Unit ID No.	PBR No.	Version No./Date
B56P9CWS1	106.371	09/04/2000
B56SEP001	106.532	09/04/2000
B58PWSC802	106.454	07/08/1998
PROPWRA PROPWRB PROPWRC	106.263	11/01/2001
A25SILRT25 B4SILRD500 BM54SILR30	106.473	09/04/2000
A25SISTT25 B4SISTD500 BM54SIST30	106.478	09/04/2000
B56P9TK1	106.474	09/04/2000
B73ESSTHCL	106.532	09/04/2000

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

Date	Permit Number	Regulated Entity Number
November 19, 2025	O2697	RN100225945

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

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

Date	Permit Number	Regulated Entity Number
November 19, 2025	O2697	RN100225945

Unit ID No.	PBR No.	Version No./Date Or Registration No.	Monitoring Requirement
A25SIFU01 B4SIFU01 BM54SIFU01	106.261 106.262	154810	New piping components are managed in accordance with the current Leak Detection and Repair (LDAR) fugitive monitoring program.
B4ADFU01	106.477	50646	New piping components are managed in accordance with the current Leak Detection and Repair (LDAR) fugitive monitoring program.
B4ADFU01	106.477	153945	New piping components are managed in accordance with the current Leak Detection and Repair (LDAR) fugitive monitoring program.
B56P9CWS1	106.371	09/04/2000	One-time verification by P&ID review indicates cooling system once through water will not be in direct contact with gaseous/liquid process streams containing carbon compounds.
B56SEP001	106.532	09/04/2000	Confirmation facility performs indicated function.
B58PWSC802	106.454	07/08/1998	Inspect equipment and record data monthly to ensure compliance with any applicable requirements in 115.412(1)(A)-(F).
PROPWRA PROPWRC PROPWRC	106.263	11/01/2001	Track emissions on a rolling 12-month basis.
A25SILRT25 B4SILRD500 BM54SILR30	106.473	09/04/2000	Maintain records of annual throughput.
A25SISTT25 B4SISTD500 BM54SIST30	106.478	09/04/2000	Maintain records of tank service and annual throughput.
B56P9TK1	106.474	09/04/2000	Maintain records of tank service and annual throughput.

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
November 19, 2025	O2697	RN100225945

Unit ID No.	PBR No.	Version No./Date Or Registration No.	Monitoring Requirement
B73ESSTHCL	106.532	09/04/2000	Confirmation facility performs indicated function.
<i>B56FU01</i>	<i>106.262</i>	<i>07/22/2025</i>	<i>New piping components are managed in accordance with the current Leak Detection and Repair (LDAR) fugitive monitoring program.</i>

Texas Commission on Environmental Quality

Title V Existing

2697

Site Information (Regulated Entity)

What is the name of the permit area to be authorized?	FREEPORT ENERGY CENTER
Does the site have a physical address?	Yes
Physical Address	
Number and Street	2301 N BRAZOSPORT BLVD
City	FREEPORT
State	TX
ZIP	77541
County	BRAZORIA
Latitude (N) (##.#####)	28.990833
Longitude (W) (-###.#####)	95.4075
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 (###-###-####)	9792389977
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)
Routing (such as Mail Code, Dept., or Attn:)
City
State
Zip
Phone (###-###-####)
Extension
Alternate Phone (###-###-####)
Fax (###-###-####)
E-mail

2301 N BRAZOSPORT BLVD
BLDG B-101
FREEPORT
TX
77541
9792389764

9792380317
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:

28 Deg 59 Min 27 Sec

3) Permit Longitude Coordinate:

95 Deg 24 Min 27 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

Form_OP-UA6_60Db.xlsx

Hash

CF82B5AD96E4FCD55260BCBF33D3B8427FE7B3A75CBBAC7F66D4054FCE6F5260

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

2025-11-19_Minor_Revision_O2697.pdf

Hash

AF0985FA74AE60AE312A287EA9DABA113A3CB3DD3661A4E7D4FD38BE73005B49

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 2697.
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:	170.85.98.253
Signature Date:	2025-11-21
Signature Hash:	47028DDAF3697FA5C70F77C16A06E50F53CC1EEEEAEF487D89AB53CE34D67B713
Form Hash Code at time of Signature:	A93A7171608409DB537134BEF9B608DCB2CCF1C7AB0483C02269D4E6ED101546

Submission

Reference Number:	The application reference number is 843002
Submitted by:	The application was submitted by ER028176/Fran Q Falcon
Submitted Timestamp:	The application was submitted on 2025-11-21 at 10:11:22 CST
Submitted From:	The application was submitted from IP address 170.85.98.253
Confirmation Number:	The confirmation number is 698197
Steers Version:	The STEERS version is 6.93
Permit Number:	The permit number is 2697

Additional Information

Application Creator: This account was created by Crystal Schmidt

Unit Attribute (UA) Form Table Instructions
Federal Operating Permit Program
Texas Commission on Environmental Quality

Overview:

The UA Form includes General Information, a Table of Contents, OP-SUM, OP-REQ2, and the unit attribute tables for the emission units which start on Page 1. The corresponding instructions for the unit attribute tables are found in the UA Form Instructions link in the Website Links section. A dropdown menu is used in all of the unit attribute tables. The dropdown menu corresponds to the codes that are available in the form instructions. These forms have conditional formatting and data validation which use a dropdown menu. Therefore, if typing or pasting codes that are not in the dropdown menu, an error will occur.

This sheet is for informational purposes only. No data is required and you do not need to print this sheet. Please begin by inserting the permit information in the General Information sheet. Complete the UA Form in order of the sheets until you reach Page 1, then complete the unit attribute tables as applicable. Responses and data entered on the OP-SUM Table 1 are used to prefill columns in the remaining sheets of the UA form.

The recommended zoom setting is 100%. Adjusting the zoom may affect the visibility of instructions.

When pasting, always use Excel's "Paste as Values" option from the right-clicking menu. "Paste as Values" can be used when data repeats on multiple forms.

Fully expand the row by increasing the row heights so all text is visible. (Place the cursor on the bottom of the number line to the far left of the screen, click and drag downward until all text is visible.)

Accessibility disclaimer: this form contains intentionally blank cells.

Under Texas Government Code 559.003(a), individuals are entitled to receive and review any information collected by TCEQ about the individual by means of a form that that is completed and filed with TCEQ in a paper or electronic format on the TCEQ website consistent with Texas Government Code sec., 559.003(b). The individual is also entitled to have TCEQ correct information about the individual that is incorrect.

If you have questions on how to fill out this form or about the Air Permits Division, please contact us at 512-239-1250.

Instructions:

[General Information](#)

The General Information sheet holds the permit information. Applicants will enter the following permit application information for the site:

"Date", "Customer Reference No.", "Regulated Entity No.", "Permit No.", "Permit Area Name", and "Project Number" if available. The applicants will use the dropdown menu for "Permit Type", "Project Type", and "Submission Type". The "Title V Form Release Date", "Form Number", "APD ID Number", and "Version Revised Date" are present and cannot be altered.

Any subsequent submittals must have a new date.

[Table of Contents](#)

Unit Attribute (UA) Form Table Instructions
Federal Operating Permit Program
Texas Commission on Environmental Quality

The Table of Contents lists all of the sheets in the UA Form Table. If information is submitted on the OP-SUM, OP-REQ2 or the Unit Attribute pages, the “Data Submitted” column will display a “Yes”. If no information is submitted, the “Data Submitted” column will remain blank. The Table of Contents information is autopopulated. Applicants will not need to submit any information in the Table of Contents.

On the Table of Contents sheet, there are filter dropdowns in row 3 that are optional tools to simplify data shown on the sheet.

To use the Table of Contents filter(s):

- Locate row 3 on the Table of Contents sheet.
 - Left click the arrow icon in whichever column you would like to filter. A box will appear with checkboxes of all data within the table column.
 - Select the applicable checkbox(s), or search for specific data by using the search bar, and then select the “OK” button.
 - The table will filter out data that has not been selected.
 - Should the project require different filter settings during the process, return to the filter(s) and update the checkboxes accordingly.
- To return to the original state of the sheet, select the “(Select All)” checkbox for all table column filters.

[OP-SUM Table 1](#)
and [OP-SUM Table 2](#)

The data found in the Unit ID No. and Group ID No. columns are used to prefill the dropdown menus for the Unit ID No. found in the OP-REQ2 and the unit attribute tables. Use the dropdown menus in the OP-SUM to select data. If there is no dropdown menu, enter the data. Refer to the OP-SUM form instructions for further details to fill out the table.

[OP-REQ2](#)

The OP-REQ2 contains dropdown menus for Unit AI and Unit ID No. The data in the dropdown menus come from the data submitted in the OP-SUM Table 1. If a Unit ID No. is a member of a group, only the Group ID No. will be available in the dropdown menu. If a permit shield is being requested for a Unit ID No., the ID No. must be entered on the OP-SUM Table 1. Refer to the OP-REQ2 form instructions for further details to fill out the table.

The Potentially Applicable Regulatory Name column has conditional formatting in place if a regulatory name is typed in or pasted rather than selected from the dropdown menu. This does not automatically indicate an error.

Unit Attribute Tables begin with [Page 1](#):

The pages contain the unit attribute tables. The Unit ID No. dropdown menu is populated with the Unit ID No. entered in the OP-SUM Table 1. If a Unit ID No. is a member of a group, only the Group ID No. will be available in the dropdown menu. The SOP/GOP Index No. is not a dropdown menu. The SOP/GOP Index No. cannot be left blank and must be entered by the applicant. The dropdown menu for the other columns in the table corresponds to the codes that are available for each question found in the UA Form Instructions. Refer to the specific OP-UA form instructions for further details to fill out the table.

If existing information on a unit attribute table for an operating scenario needs to be changed, updated, or deleted (including index numbers) provide a description of the change in the “Description of Change and Provisional Terms and Conditions” section of Form OP-2. The OP-2 description should clearly identify whether existing UA data is being updated.

For application updates within a specific project the entire UA form must be resubmitted with the changed, new or clarified information included.

OP-2 Form Instructions can be found at the link below:

https://www.tceq.texas.gov/permitting/air/forms/titlev/administrative/tv_admin3_forms.html

Unit Attribute (UA) Form Table Instructions
Federal Operating Permit Program
Texas Commission on Environmental Quality

OP-UA (including OP-SUM and OP-REQ2) Form Instructions can be found at the link below:

<https://www.tceq.texas.gov/permitting/air/forms/titlev/unit-attributes/air-all-ua-forms>

Website Links:

Decision Support System:

<https://www.tceq.texas.gov/permitting/air/titlev/decision-support-system>

Permitting Tools and Guidance for General Operating Permits

https://www.tceq.texas.gov/permitting/air/titlev/generalpermits/gop_experts.html

Permitting Tools and Guidance for Site Operating Permits

https://www.tceq.texas.gov/permitting/air/titlev/site/site_experts.html

Boiler/Steam Generator/Steam Generating Unit Attributes
Form OP-UA6
Federal Operating Permit Program
Texas Commission on Environmental Quality

General Information

Requested Information	Response
Date:	11/19/2025
Customer Reference No.:	CN600356976
Regulated Entity No.:	RN100225945
Permit No.:	O2697
Permit Area Name:	Freeport Energy Center
Permit Type:	SOP
Project Type:	Revision
Submission Type:	New Application
Project Number (if available):	TBD
Form Information	TCEQ Entry Only
Title V Form Release Date:	10/2025
Form Number:	10026
APD ID Number:	40v2.0
Version Revised Date:	10/2025
	This form is for use by facilities subject to air quality permit requirements and may be revised periodically.

Boiler/Steam Generator/Steam Generating Unit Attributes
Form OP-UA6
Federal Operating Permit Program
Texas Commission on Environmental Quality

Table of Contents

Table	Regulation	Page	Data Submitted
N/A	N/A	OP-SUM Table 1	Yes
N/A	N/A	OP-SUM Table 2	
N/A	N/A	OP-REQ2	
Table 1a	40 CFR Part 60, Subpart D: Standards of Performance for Fossil Fuel-Fired Steam Generators	Page 1	
Table 1b	40 CFR Part 60, Subpart D: Standards of Performance for Fossil Fuel-Fired Steam Generators	Page 2	
Table 2a	40 CFR Part 60, Subpart Da: Standards of Performance for Electric Utility Steam Generating Units	Page 3	
Table 2b	40 CFR Part 60, Subpart Da: Standards of Performance for Electric Utility Steam Generating Units	Page 4	
Table 2c	40 CFR Part 60, Subpart Da: Standards of Performance for Electric Utility Steam Generating Units	Page 5	
Table 3a	40 CFR Part 60, Subpart Db: Standards of Performance for Industrial-Commercial-Institutional Steam Generating Units	Page 6	Yes
Table 3b	40 CFR Part 60, Subpart Db: Standards of Performance for Industrial-Commercial-Institutional Steam Generating Units	Page 7	Yes
Table 3c	40 CFR Part 60, Subpart Db: Standards of Performance for Industrial-Commercial-Institutional Steam Generating Units	Page 8	Yes
Table 3d	40 CFR Part 60, Subpart Db: Standards of Performance for Industrial-Commercial-Institutional Steam Generating Units	Page 9	Yes
Table 3e	40 CFR Part 60, Subpart Db: Standards of Performance for Industrial-Commercial-Institutional Steam Generating Units	Page 10	
Table 4a	40 CFR Part 60, Subpart Dc: Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units	Page 11	
Table 4b	40 CFR Part 60, Subpart Dc: Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units	Page 12	
Table 5a	30 TAC Chapter 117, Subchapter B: Combustion Control at Major Industrial, Commercial, and Institutional Sources in Ozone Nonattainment Areas	Page 13	
Table 5b	30 TAC Chapter 117, Subchapter B: Combustion Control at Major Industrial, Commercial, and Institutional Sources in Ozone Nonattainment Areas	Page 14	
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General Business

[illegible]

**Boiler/Steam Generator/Steam Generating Unit Attributes
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Form OP-SUM - Individual Unit Summary

Table 2: Acid Rain, Cross-State Air Pollution Rule (CSAPR), and Texas SO2 Trading Program

Unit AI	Revision No.	Unit ID No.	COR Unit ID No.	Acid Rain	ARP Status	CSAPR	CSAPR Monitoring	Texas SO2	Texas SO2 Monitoring	COR

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Form OP-REQ2 - Negative Applicable/Superseded Requirement Determinations

Unit AI	Revision No.	Unit ID No.	Potentially Applicable Regulatory Name	Negative Applicability/Superseded Requirement Citation	Negative Applicability/Superseded Requirement Reason

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Table 1a: Title 40 Code of Federal Regulations Part 60 (40 CFR Part 60)
Subpart D: Standards of Performance for Fossil Fuel-Fired Steam Generators

Unit ID No.	SOP Index No.	Construction/ Modification Date	Covered Under Subpart Da or KKKK	Changes to Existing Affected Facility	Heat Input Rate	Alternate 42C	PM CEMS	Opacity Monitoring	Gas/Liquid Fuel	Fuels with 0.33 % or Less Sulfur	Specific Site

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Boiler/Steam Generator/Steam Generating Unit Attributes
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Table 1b: Title 40 Code of Federal Regulations Part 60 (40 CFR Part 60)
Subpart D: Standards of Performance for Fossil Fuel-Fired Steam Generators

Unit ID No.	SOP Index No.	D-Series Fuel Type	D-Series Fuel Type	D-Series Fuel Type	Alternate 43D	Alternate 44F	Flue Gas Desulfurization	SO2 Monitoring	Cyclone- Fired Unit	NOX Monitoring Type

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Table 2a: Title 40 Code of Federal Regulations Part 60 (40 CFR Part 60)
Subpart Da: Standards of Performance for Electric Utility Steam Generating Units

Unit ID No.	SOP Index No.	Construction/ Modification Date	Heat Input of Fossil Fuel	D-Series Fuel Type	D-Series Fuel Type	D-Series Fuel Type	Changes to Existing Affected Facility	Percent (%) Coal Refuse	Combined Cycle Type	PM Commercial Demonstration Permit	PM Standard Basis

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Table 2b: Title 40 Code of Federal Regulations Part 60 (40 CFR Part 60)
Subpart Da: Standards of Performance for Electric Utility Steam Generating Units

Unit ID No.	SOP Index No.	NO _x IGCC Standard	MACT Applicability	Unit Type	PM Monitoring Type	Opacity Monitoring Type	SO ₂ Monitoring Type	NO _x Monitoring Type	SO ₂ Commercial Demonstration Permit	SO ₂ Emission Rate	FGD

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Table 2c: Title 40 Code of Federal Regulations Part 60 (40 CFR Part 60)
Subpart Da: Standards of Performance for Electric Utility Steam Generating Units

Unit ID No.	SOP Index No.	SO2 Standard Basis	NOx Comm. Dem. Permit	Alt. Stds. for Comb. NOx and CO	NOx Standard Basis	Duct Burner	PM Flow Monitoring System	SO2 Flow Monitoring System	NOX Flow Monitoring System

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Boiler/Steam Generator/Steam Generating Unit Attributes
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Table 3a: Title 40 Code of Federal Regulations Part 60 (40 CFR Part 60)

Subpart Db: Standards of Performance for Industrial-Commercial-Institutional Steam Generating Units

Unit ID No.	SOP Index No.	Construction/ Modification Date	Heat Input Capacity	Subpart Da	Changes to Existing Affected Facility	Subpart Ea, Eb, AAAA, or CCCC
B56CR96	60Db-01	97-05C	250+	NO	NO	NO

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Subpart KKKK	Subpart Cb or BBBB	Temporary Boiler
NO	NO	NO

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Table 3b: Title 40 Code of Federal Regulations Part 60 (40 CFR Part 60)

Subpart Db: Standards of Performance for Industrial-Commercial-Institutional Steam Generating Units

Unit ID No.	SOP Index No.	D-Series Fuel Type	D-Series Fuel Type	D-Series Fuel Type	Subpart D	Additional Applicability Requirement	ACF Option SO2	ACF Option PM	ACF Option NOX
B56CR96	60Db-01	NG	BPW			NONE	OTHR	OTHR	OTHR

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Boiler/Steam Generator/Steam Generating Unit Attributes
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Table 3c: Title 40 Code of Federal Regulations Part 60 (40 CFR Part 60)
Subpart Db: Standards of Performance for Industrial-Commercial-Institutional Steam Generating Units

Unit ID No.	SOP Index No.	60.42b (k)(2) Low Sulfur Exemption	60.42b (k)(4) Alternative	Post- Combustion Control	60.43b(h)(2) Alternative	Electrical or Mechanical Output	Output Based Limit	60.49 Da(n) Alternative	60.49 Da(m) Alternative
B56CR96	60Db-01					NO			

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Boiler/Steam Generator/Steam Generating Unit Attributes
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Table 3d: Title 40 Code of Federal Regulations Part 60 (40 CFR Part 60)

Subpart Db: Standards of Performance for Industrial-Commercial-Institutional Steam Generating Units

Unit ID No.	SOP Index No.	Residual Oil Sampling	Monitoring Type PM	Monitoring Type PM (Opacity)	Monitoring Type NOX	Monitoring Type SO2	Technology Type	Unit Type	Heat Release Rate	Heat Input Gas/Oil	Heat Input Wood	Fuel Heat Input
B56CR96	60Db-01		NONE	NONE	CEM	NONE	NONE	DCTBR N2		NO		

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Boiler/Steam Generator/Steam Generating Unit Attributes
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Table 3e: Title 40 Code of Federal Regulations Part 60 (40 CFR Part 60)
Subpart Db: Standards of Performance for Industrial-Commercial-Institutional Steam Generators

Unit ID No.	SOP Index No.	Alternate Emission Limit (AEL)

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rating Units

AEL ID. NO.

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Table 4a: Title 40 Code of Federal Regulations Part 60 (40 CFR Part 60)

Subpart Dc: Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units

Unit ID No.	SOP Index No.	Construction/ Modification Date	Maximum Design Heat Input Capacity	Applicability	Heat Input Capacity	D-Series Fuel Type	D-Series Fuel Type	D-Series Fuel Type	ACF Option SO2	ACF Option PM	30% Coal Duct Burner

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Boiler/Steam Generator/Steam Generating Unit Attributes
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Table 4b: Title 40 Code of Federal Regulations Part 60 (40 CFR Part 60)

Subpart Dc: Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units

Unit ID No.	SOP Index No.	Monitoring Type PM	Monitoring Type SO2 Inlet	Monitoring Type SO2 Outlet	Technology Type	43CE-Option	47C-Option

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Table 5a: Title 30 Texas Administrative Code Chapter 117 (30 TAC Chapter 117)

Subchapter B: Combustion Control at Major Industrial, Commercial, and Institutional Sources in Ozone Nonattainment Areas

Unit ID No.	SOP Index No.	Unit Type	MRC	RACT Date Placed in Service	Functionally Identical Replacement	Fuel Type	Fuel Type	Fuel Type	Annual Heat Input

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Boiler/Steam Generator/Steam Generating Unit Attributes
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Table 5b: Title 30 Texas Administrative Code Chapter 117 (30 TAC Chapter 117)

Subchapter B: Combustion Control at Major Industrial, Commercial, and Institutional Sources in Ozone Nonattainment Areas

Unit ID No.	SOP Index No.	NOX Emission Limitation	Opt-In Unit	23C-Option	Title 30 TAC Chapter 116 Permit Limit	EGF System Cap Unit	NOX Emission Limit Average	NOX Reduction	Common Stack Combined

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Table 5c: Title 30 Texas Administrative Code Chapter 117 (30 TAC Chapter 117)

Subchapter B: Combustion Control at Major Industrial, Commercial, and Institutional Sources in Ozone Nonattainment Areas

Unit ID No.	SOP Index No.	Fuel Type Heat Input	NOX Monitoring System	Fuel Flow Monitoring	CO Emission Limitation	CO Monitoring System	NH3 Emission Limitation	NH3 Emission Monitoring

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Table 6a: Title 30 Texas Administrative Code Chapter 117 (30 TAC Chapter 117)
Subchapter C: Combustion Control at Major Utility Electric Generation Sources in Ozone Nonattainment Areas

Unit ID No.	SOP Index No.	Date Placed in Service	Functionally Identical Replacement	Annual Heat Input	Service Type	Fuel Type	Fuel Type	Fuel Type	RACT NO _x Emission Limitation	ESAD NO _x Emission Limitation	EGF

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Table 6b: Title 30 Texas Administrative Code Chapter 117 (30 TAC Chapter 117)
Subchapter C: Combustion Control at Major Utility Electric Generation Sources in Ozone Nonattainment Areas

Unit ID No.	SOP Index No.	Fuel Firing Option	ESAD NOx DFW 8-Hour	NOx Monitoring System	Title 30 TAC Chapter 116 Permit Limit	CO Emission Limitation	CO Monitoring System	Ammonia Use	NH3 Emission Limitation	NH3 Monitoring System

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Table 7: Title 30 Texas Administrative Code Chapter 112 (30 TAC Chapter 112)
Subchapters A-D: Control of Air Pollution from Sulfur Compounds

Unit ID No.	SOP Index No.	Fuel Type	Date of Operation	Heat Input	Control Equipment	FCAA § 412(c)	Stack Height

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Table 8a: Title 30 Texas Administrative Code Chapter 113 (30 TAC Chapter 113)
Subchapter D: Hospital/Medical/Infectious Waste Incinerators

Unit ID No.	SOP Index No.	Construction Date	Combustor Type	Type of Waste	Co-Fired Combustor	HMIWI Size	Control Device	PM CEMS	Opacity Monitoring	Approved Equivalent ID No.

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Table 8b: Title 30 Texas Administrative Code Chapter 113 (30 TAC Chapter 113)
Subchapter D: Hospital/Medical/Infectious Waste Incinerators

Unit ID No.	SOP Index No.	Commercial Unit	CO Monitoring	Approved Equivalent ID No.	Dioxins/ Furans CEMS	Toxic Equivalent Method	HCL CEMS	HCL Percentage Reduction Method

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Table 8c: Title 30 Texas Administrative Code Chapter 113 (30 TAC Chapter 113)
Subchapter D: Hospital/Medical/Infectious Waste Incinerators

Unit ID No.	SOP Index No.	Pb CEMS	Pb % Reduction Method	Cd CEMS	Cd % Reduction Method	Hg CEMS	Hg % Reduction Method

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Table 9a: Title 30 Texas Administrative Code Chapter 117 (30 TAC Chapter 117)
Subchapter E, Division 1: Utility Electric Generation in East and Central Texas

Unit ID No.	SOP Index No.	Date Placed in Service	Unit Exempt	Location	Capacity	30% of the Maximum	Firing Method

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Boiler/Steam Generator/Steam Generating Unit Attributes
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Table 9b: Title 30 Texas Administrative Code Chapter 117 (30 TAC Chapter 117)
Subchapter E, Division 1: Utility Electric Generation in East and Central Texas

Unit ID No.	SOP Index No.	NOx Emission Limitation	Fuel	NOx Monitoring	Maximum Emission Rate	Ammonia Use	NH3 Emission Limitation	Ammonia Monitoring

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Table 10a: Title 40 Code of Federal Regulations Part 63 (40 CFR Part 63)
Subpart EEE: Hazardous Waste Combustors

Unit ID No.	SOP Index No.	Type Fuel	Existing Source	Area Source	Elective Standards	Dioxin/Furan Standard	Heating Value	Hg Feedrate

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Table 10b: Title 40 Code of Federal Regulations Part 63 (40 CFR Part 63)
Subpart EEE: Hazardous Waste Combustors

Unit ID No.	SOP Index No.	Alt Metals	Met Feedrate	CO/THC Standard	Baghouse	PM Detection	Dioxin-Listed	DRE Previous Test	Feed Zone

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Table 11: Title 30 Texas Administrative Code Chapter 111 (30 TAC Chapter 111)
Subchapter A, Division 2: Incineration

Unit ID No.	SOP Index No.	Hazardous Waste	Monitor

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Table 12: Title 30 Texas Administrative Code Chapter 111 (30 TAC Chapter 111)
Subchapter A, Division 5: Emission Limits on Nonagricultural Processes

Unit ID No.	SOP Index No.	Source Type

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Table 13a: Title 40 Code of Federal Regulations Part 63 (40 CFR Part 63)
Subpart UUUUU: Coal- and Oil-Fired Electric Utility Steam Generating Units

Unit ID No.	SOP Index No.	§63.9983(a)	§63.9983(b)	§63.9983(c)	§63.9983(d)	Limited-use Liquid	Construction Status

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Boiler/Steam Generator/Steam Generating Unit Attributes
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Table 13b: Title 40 Code of Federal Regulations Part 63 (40 CFR Part 63)
Subpart UUUUU: Coal- and Oil-Fired Electric Utility Steam Generating Units

Unit ID No.	SOP Index No.	Start-Up	Unit Fuel	Pollutant-a	Syngas	PM-Input	TOTHAP-Input

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Boiler/Steam Generator/Steam Generating Unit Attributes
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Table 13c: Title 40 Code of Federal Regulations Part 63 (40 CFR Part 63)
Subpart UUUUU: Coal- and Oil-Fired Electric Utility Steam Generating Units

Unit ID No.	SOP Index No.	Sb-Input	As-Input	Be-Input	Cd-Input	Cr-Input	Co-Input

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Table 13d: Title 40 Code of Federal Regulations Part 63 (40 CFR Part 63)
Subpart UUUUU: Coal- and Oil-Fired Electric Utility Steam Generating Units

Unit ID No.	SOP Index No.	Pb-Input	Mn-Input	Ni-Input	Se-Input	Hg-Input-a	Pollutant-b

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Table 13e: Title 40 Code of Federal Regulations Part 63 (40 CFR Part 63)
Subpart UUUUU: Coal- and Oil-Fired Electric Utility Steam Generating Units

Unit ID No.	SOP Index No.	HCl-Input	SO2-Input	Hg-Input-c	Hg-LEE Test	HF-Input	Scrubber/Bypass	PM-LEE

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Table 13f: Title 40 Code of Federal Regulations Part 63 (40 CFR Part 63)
Subpart UUUUU: Coal- and Oil-Fired Electric Utility Steam Generating Units

Unit ID No.	SOP Index No.	TOTHAP-LEE	Sb-LEE	As-LEE	Be-LEE	Cd-LEE	Cr-LEE

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Boiler/Steam Generator/Steam Generating Unit Attributes
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Table 13g: Title 40 Code of Federal Regulations Part 63 (40 CFR Part 63)
Subpart UUUUU: Coal- and Oil-Fired Electric Utility Steam Generating Units

Unit ID No.	SOP Index No.	Co-LEE	Pb-LEE	Mn-LEE	Ni-LEE	Se-LEE	Hg-LEE-a

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Table 13h: Title 40 Code of Federal Regulations Part 63 (40 CFR Part 63)
Subpart UUUUU: Coal- and Oil-Fired Electric Utility Steam Generating Units

Unit ID No.	SOP Index No.	HCl-LEE	SO2-LEE	Hg-LEE-c	HF-LEE	Startup

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Table 13i: Title 40 Code of Federal Regulations Part 63 (40 CFR Part 63)
Subpart UUUUU: Coal- and Oil-Fired Electric Utility Steam Generating Units

Unit ID No.	SOP Index No.	Compliance Demo	Stack Config	O2-CO2 CEMS	Flow Monitor	Gas Moisture	Direct HAP

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Table 14a: Title 40 Code of Federal Regulations Part 63 (40 CFR Part 63)
Subpart DDDDD: Industrial, Commercial, and Institutional Boilers

Unit ID No.	SOP/GOP Index No.	Commence	Table Applicability	HCl Emission	HCl-CMS

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Boiler/Steam Generator/Steam Generating Unit Attributes
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Table 14b: Title 40 Code of Federal Regulations Part 63 (40 CFR Part 63)
Subpart DDDDD: Industrial, Commercial, and Institutional Boilers

Unit ID No.	SOP/GOP Index No.	HCl-CD	HCl-Test	HCl-FA	HCl-FloMon	HCl-pHMon

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Table 14c: Title 40 Code of Federal Regulations Part 63 (40 CFR Part 63)
Subpart DDDDD: Industrial, Commercial, and Institutional Boilers

Unit ID No.	SOP/GOP Index No.	Hg Emission	Hg-InjRate	Hg-CMS	Hg-CD	Hg-Test	Hg-FA

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Table 14d: Title 40 Code of Federal Regulations Part 63 (40 CFR Part 63)
Subpart DDDDD: Industrial, Commercial, and Institutional Boilers

Unit ID No.	SOP/GOP Index No.	BM Subcategory	PM/TSM Emission	TSM-CMS	TSM-Test	TSM-FA

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Table 14e: Title 40 Code of Federal Regulations Part 63 (40 CFR Part 63)
Subpart DDDDD: Industrial, Commercial, and Institutional Boilers

Unit ID No.	SOP/GOP Index No.	PM-250	PM-CMS	PM-CD	PM-Test	PM-FM	PM-PMON

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Table 14f: Title 40 Code of Federal Regulations Part 63 (40 CFR Part 63)
Subpart DDDDD: Industrial, Commercial, and Institutional Boilers

Unit ID No.	SOP/GOP Index No.	Opacity-CD	COMS	OPT-Test

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Table 14g: Title 40 Code of Federal Regulations Part 63 (40 CFR Part 63)
Subpart DDDDD: Industrial, Commercial, and Institutional Boilers

Unit ID No.	SOP/GOP Index No.	SFF Subcategory	CO Emission	CO-CMS	CO-Test

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Table 15a: Title 40 Code of Federal Regulations Part 60 (40 CFR Part 60)

Subpart TTTT: Standards of Performance for Greenhouse Gas Emissions for Electric Utility Generating Units

Unit ID No.	SOP Index No.	Unit Type	Construction/ Modification Date	Base Load Rating	Commercial Operation Date	Emissions Reporting Date	Acid Rain Program

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Table 15b: Title 40 Code of Federal Regulations Part 60 (40 CFR Part 60)

Subpart TTTT: Standards of Performance for Greenhouse Gas Emissions for Electric Utility Generating Units

Unit ID No.	SOP Index No.	CO2 Capture	CO2 Transfer	Monitoring	Common Stack	Multiple Stacks	Common Electric Generator

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From: Princess Ohiagu
Sent: Wednesday, July 8, 2026 1:43 PM
To: 'Schmidt, Crystal (C)'
Subject: RE: Technical Review -- FOP O2697/Project 39438, The Dow Chemical Company/Dow Texas Operations Freeport

Hello,

Thank you for your email. The information is being reviewed.

Thank you for your patience.

Princess Ohiagu
Operating Permits
Air Permits Division
Texas Commission on Environmental Quality
(512) 239-2048
Princess.ohiagu@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: Wednesday, July 8, 2026 12:17 PM
To: Princess Ohiagu <Princess.Ohiagu@tceq.texas.gov>
Subject: RE: Technical Review -- FOP O2697/Project 39438, The Dow Chemical Company/Dow Texas Operations Freeport

Princess,

Please see the attached response and let me know if you have any questions. Thanks!

Crystal Schmidt

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



Seek Together™

General Business

From: Princess Ohiagu <Princess.Ohiagu@tceq.texas.gov>
Sent: Wednesday, July 1, 2026 12:10 PM
To: Schmidt, Crystal (C) <cschmidt6@dow.com>
Subject: RE: Technical Review -- FOP O2697/Project 39438, The Dow Chemical Company/Dow Texas Operations Freeport

You don't often get email from princess.ohiagu@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 afternoon, Crystal,

After reviewing the revision application, we have identified the following items that are required to complete the review. These items are due by ***July 8, 2026***:

- ***Complete the attached Major NSR Summary Table by entering applicable special condition terms in the right three columns of the table. The table must be submitted as a Microsoft Word document in order to merge with the Title V permit correctly.***

Thank you,

Princess Ohiagu
Operating Permits
Air Permits Division
Texas Commission on Environmental Quality
(512) 239-2048
Princess.ohiagu@tceq.texas.gov



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

From: Princess Ohiagu
Sent: Wednesday, May 27, 2026 3:56 PM
To: cschmidt6@dow.com
Subject: Technical Review -- FOP O2697/Project 39438, The Dow Chemical Company/Dow Texas Operations Freeport

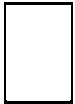
Good afternoon,

After reviewing the revision application, we have identified the following items that are required to complete the review. These items are due by ***June 12, 2026***:

- ***Complete the attached Major NSR Summary Table by entering applicable special condition terms in the right three columns of the table. The table must be submitted as a Microsoft Word document in order to merge with the Title V permit correctly.***

Thank you,

Princess Ohiagu
Operating Permits
Air Permits Division
Texas Commission on Environmental Quality
(512) 239-2048
Princess.ohiagu@tceq.texas.gov



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



July 22, 2026

E-MAIL RESPONSE

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

The Dow Chemical Company, CN600356976
Freeport Energy Center, RN100225945
Title V Operating Permit WDP Response for Freeport Energy Center, O2697
TCEQ Project Number: 39438

Dear Ms. Ohiagu,

The Dow Chemical Company (Dow) is providing comments on the Working Draft Permit (WDP) that was provided on July 10, 2026.

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

Sincerely,

Crystal Schmidt

Crystal Schmidt
Air Permit Manager

enclosure

cc:

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

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

Working Draft Permit Comments

Applicable Requirements Summary

1. B56CR96: Can you please reevaluate the citations listed for 40 CFR Part 60, Subpart Db applicability. I believe we should have citations for NO_x and possibly PM (Opacity).

From: Schmidt, Crystal (C) <cschmidt6@dow.com>
Sent: Thursday, August 6, 2026 1:36 PM
To: Princess Ohiagu
Subject: RE: Working Draft Permit -- FOP O2697/Project 39438, The Dow Chemical Company/Dow Texas Operations Freeport
Attachments: 2026-08-06_WDP_Response_O2697.pdf

Princess,

Please see out attached response and let me know if you have any questions. Thanks!

Crystal Schmidt

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



General Business

From: Princess Ohiagu <Princess.Ohiagu@tceq.texas.gov>
Sent: Thursday, July 30, 2026 3:45 PM
To: Schmidt, Crystal (C) <cschmidt6@dow.com>
Subject: RE: Working Draft Permit -- FOP O2697/Project 39438, The Dow Chemical Company/Dow Texas Operations Freeport

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Crystal,

The permit has been updated with attributes on FORM OP-UA6. An electronic copy of the Working Draft Permit (WDP) is attached for your review.

Please review the revised WDP and submit to me any comments or approval you have on the working draft permit by ***August 4, 2026***.

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.

Princess Ohiagu
Operating Permits
Air Permits Division
Texas Commission on Environmental Quality
(512) 239-2048
Princess.ohiagu@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, July 30, 2026 2:59 PM
To: Princess Ohiagu <Princess.Ohiagu@tceq.texas.gov>
Subject: RE: Working Draft Permit -- FOP O2697/Project 39438, The Dow Chemical Company/Dow Texas Operations Freeport

Princess,

Table 3d was completed in the initial submittal. I'm attaching it here in case something got lost in the submittal process in STEERS. Please let me know if you need anything else from me.

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: Princess Ohiagu <Princess.Ohiagu@tceq.texas.gov>
Sent: Thursday, July 30, 2026 1:10 PM
To: Schmidt, Crystal (C) <cschmidt6@dow.com>
Subject: RE: Working Draft Permit -- FOP O2697/Project 39438, The Dow Chemical Company/Dow Texas Operations Freeport

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.

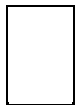
Good afternoon, Crystal,

We have identified the following items that are required to complete the review. All items are due by **August 3, 2026**.

- We confirm that PM(Opacity) generated permit applicability. To determine applicability for NOX, please complete Table 3d and, depending on responses Table 3e may also be required.

Thank you,

Princess Ohiagu
Operating Permits
Air Permits Division
Texas Commission on Environmental Quality
(512) 239-2048
Princess.ohiagu@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: Wednesday, July 22, 2026 2:47 PM
To: Princess Ohiagu <Princess.Ohiagu@tceq.texas.gov>
Subject: RE: Working Draft Permit -- FOP O2697/Project 39438, The Dow Chemical Company/Dow Texas Operations Freeport

Princess,

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

Crystal Schmidt

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



General Business

From: Schmidt, Crystal (C) <cschmidt6@dow.com>
Sent: Thursday, July 16, 2026 9:18 PM

To: Princess Ohiagu <Princess.Ohiagu@tceq.texas.gov>

Subject: RE: Working Draft Permit -- FOP O2697/Project 39438, The Dow Chemical Company/Dow Texas Operations Freeport

Princess,

A couple of things. First, may we have an extension until Wednesday the 22nd? I need my specialist to review the permit before we finalize this draft. Second, should we be getting PM (Opacity) and NOX citations as well for the new 60Db applicability? Perhaps I completed the flowchart incorrectly.

Thanks for your help!

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



From: Princess Ohiagu <Princess.Ohiagu@tceq.texas.gov>

Sent: Thursday, July 16, 2026 2:05 PM

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

Subject: RE: Working Draft Permit -- FOP O2697/Project 39438, The Dow Chemical Company/Dow Texas Operations Freeport

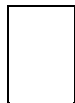
CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Hi Crystal,

I have attached the working draft permit (Word document) for your review.

Princess Ohiagu
Operating Permits
Air Permits Division
Texas Commission on Environmental Quality
(512) 239-2048

Princess.ohiagu@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, July 16, 2026 1:58 PM

To: Princess Ohiagu <Princess.Ohiagu@tceq.texas.gov>

Subject: RE: Working Draft Permit -- FOP O2697/Project 39438, The Dow Chemical Company/Dow Texas Operations Freeport

Princess,

Can you please send this to me in Word? 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: Princess Ohiagu <Princess.Ohiagu@tceq.texas.gov>

Sent: Friday, July 10, 2026 9:59 AM

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

Subject: Working Draft Permit -- FOP O2697/Project 39438, The Dow Chemical Company/Dow Texas Operations Freeport

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

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

Good morning,

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

Please review the WDP and submit to me any comments you have on the working draft permit by **July 17, 2026**.

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_factsheet.pdf. This guidance contains important information regarding WDP review and comment procedures.

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

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

Please notify me when these updates have been submitted.

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

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

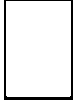
Thank you for your cooperation.

Sincerely,

Princess Ohiagu
Operating Permits
Air Permits Division
Texas Commission on Environmental Quality

(512) 239-2048

Princess.ohiagu@tceq.texas.gov



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



August 6, 2026

E-MAIL RESPONSE

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

The Dow Chemical Company, CN600356976
Freeport Energy Center, RN100225945
Title V Operating Permit WDP Response for Freeport Energy Center, O2697
TCEQ Project Number: 39438

Dear Ms. Ohiagu,

The Dow Chemical Company (Dow) is providing comments on the Working Draft Permit (WDP) that was provided on July 30, 2026.

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

Sincerely,

Crystal Schmidt

Crystal Schmidt
Air Permit Manager

enclosure

cc:

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

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

Working Draft Permit Comments

Dow has no further comments at this time.

Texas Commission on Environmental Quality

Title V Existing

2697

Site Information (Regulated Entity)

What is the name of the permit area to be authorized?	FREEPORT ENERGY CENTER
Does the site have a physical address?	Yes
Physical Address	
Number and Street	2301 N BRAZOSPORT BLVD
City	FREEPORT
State	TX
ZIP	77541
County	BRAZORIA
Latitude (N) (##.#####)	28.990833
Longitude (W) (-###.#####)	95.4075
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 (###-###-####)	9792389977
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)
Routing (such as Mail Code, Dept., or Attn:)
City
State
Zip
Phone (###-###-####)
Extension
Alternate Phone (###-###-####)
Fax (###-###-####)
E-mail

2301 N BRAZOSPORT BLVD
BLDG B-101
FREEPORT
TX
77541
9792389764

9792380317
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:

28 Deg 59 Min 27 Sec

3) Permit Longitude Coordinate:

95 Deg 24 Min 27 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.

2697-39438

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

2026-09-14_OP-CRO1_O2697.pdf

Hash

DFF7035317722DF580BDD52BD2189C5D9A9C4D2E4E29B8C236D8B0E0FE5AB39E

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 2697.
- 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:	136.226.100.170
Signature Date:	2026-09-14
Signature Hash:	904A5F0A4D5A95FBAFB56538AD7D0F5DC653CA2914752A0CB5B775D787281687
Form Hash Code at time of Signature:	9CEF2184FFF7C4075959CF5D4BED31E28681E52D17F9BCC951A521F99B81E7EC

Submission

Reference Number:	The application reference number is 962527
Submitted by:	The application was submitted by ER028176/Fran Q Falcon
Submitted Timestamp:	The application was submitted on 2026-09-14 at 09:38:23 CDT
Submitted From:	The application was submitted from IP address 136.226.100.170
Confirmation Number:	The confirmation number is 799211
Steers Version:	The STEERS version is 6.94
Permit Number:	The permit number is 2697

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.: O2697
Project No.: 39438
Area Name: Freeport Energy Center
Company Name: The Dow Chemical Company
II. Certification Type <i>(Please mark appropriate box)</i>
☐ Responsible Official Representative ☒ Duly Authorized Representative
III. Submittal Type <i>(Please mark appropriate box) (Only one response can be accepted per form)</i>
☐ SOP/TOP Initial Permit Application ☐ Permit Revision, Renewal, or Reopening
☐ GOP Initial Permit Application ☒ Update to Permit Application
☐ Other: _____

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

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

IV. Certification of Truth
This certification does not extend to information which is designated by TCEQ as information for reference only.
I, <u>Fran Falcon</u> certify that I am the <u>DAR</u> <i>(Certifier Name printed or typed)</i><i>(RO or DAR)</i>
and that, based on information and belief formed after reasonable inquiry, the statements and information dated during the time period or on the specific date(s) below, are true, accurate, and complete: <i>Note: Enter Either a Time Period or Specific Date(s) for each certification. This section must be completed. The certification is not valid without documentation date(s).</i>
Time Period: From <u>July 8, 2026</u> to <u>August 6, 2026</u> <i>(Start Date)</i><i>(End Date)</i>
Specific Dates: _____ <i>(Date 1)</i><i>(Date 2)</i><i>(Date 3)</i><i>(Date 4)</i>
_____ <i>(Date 5)</i><i>(Date 6)</i>
Signature: _____ Signature Date: <u>September 14, 2026</u>
Title: <u>Texas Regional Environmental Leader</u>