# **TCEQ Interoffice Memorandum**

Subject:	<b>Backup Revision</b> <b>August 16, 2023 Commission Agenda</b> Item No. 13 – SI Group, Inc.
Date:	August 11, 2023
From: MP	Michael Parrish, Team Leader Special Functions Team
Thru: <i>MBC</i>	Melissa Cordell, Assistant Deputy Director Enforcement Division
То:	Mary Smith, General Counsel

Docket No. 2020-1255-AIR-E

Enclosed please find the following:

# **Executive Summary:**

• Page 1, Penalty Information: Removed unnecessary language.

Please do not hesitate to call Michael Parrish at (512) 239-2548 if you have any questions regarding this matter.

cc: Garrett Arthur, Public Interest Counsel Melissa Schmidt, Public Interest Counsel Gill Valls, Office of General Counsel Katherine McKenzie, Agenda Coordinator, Litigation Division Amy Settemeyer, Deputy Director, Enforcement Division Melissa Cordell, Assistant Deputy Director, Enforcement Division Rebecca Margain-Nunez, Executive Assistant, Enforcement Division Michael De La Cruz, Manager, Air Section, Enforcement Division Danielle Porras, Enforcement Coordinator, Air Section, Enforcement Division

**Order Type:** 1660 Agreed Order **Findings Order Justification:** N/A Media: AIR **Small Business:** No Location(s) Where Violation(s) Occurred: SI Group Texas Operations, 702 Farm-to-Market Road 523, Freeport, Brazoria County **Type of Operation:** Chemical manufacturing plant **Other Significant Matters:** Additional Pending Enforcement Actions: Yes, Docket No. 2022-0018-AIR-E Past-Due Penalties: No Other: N/A Interested Third-Parties: None Texas Register Publication Date: April 28, 2023 Comments Received: No

#### **Penalty Information**

Total Penalty Assessed: \$155,159 Amount Deferred for Expedited Settlement: \$31,031 Total Paid to General Revenue: \$124,128 Total Due to General Revenue: \$0 Payment Plan: N/A # payments of \$ each Supplemental Environmental Project ("SEP") Conditional Offset: \$0 Name of SEP: N/A (Third-Party Pre-Approved) Compliance History Classifications: Person/CN - High Site/RN - High Major Source: Yes Statutory Limit Adjustment: N/A Applicable Penalty Policy: April 2014

# Investigation Information

Complaint Date(s): N/A Complaint Information: N/A Date(s) of Investigation: November 19, 2019 Date(s) of NOE(s): August 28, 2020

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#### **Violation Information**

1. Failed to maintain records for the fixed roof storage tanks. Specifically, the Respondent did not maintain a record of the type of volatile organic compounds ("VOC") stored, the starting and ending dates of when the material is stored, and the true vapor pressure at the average monthly storage temperature of the stored liquids for the fixed roof storage tanks [30 TEX. ADMIN. CODE §§ 115.118(a)(6)(A) and 122.143(4), Federal Operating Permit ("FOP") No. 01431, General Terms and Conditions ("GTC") and Special Terms and Conditions ("STC") No. 1.A, and TEX. HEALTH & SAFETY CODE § 382.085(b)].

2. Failed to maintain records for the totalizing fuel flow meters. Specifically, the Respondent did not maintain a record of the installation and calibrations for the totalizing fuel flow meters [30 TEX. ADMIN. CODE §§ 117.340(a) and 122.143(4), FOP No. 01431, GTC and STC No. 1.A, and TEX. HEALTH & SAFETY CODE § 382.085(b)].

3. Failed to limit the storage and loading operations to the chemicals appearing on the Approved Chemicals List or chemicals that are authorized through a permit a by rule. Specifically, the Respondent did not limit the chemicals used in the storage and loading operations to those appearing on the Approved Chemicals List [30 TEX. ADMIN. CODE §§ 116.115(c), 116.116(a)(2), and 122.143(4), New Source Review ("NSR") Permit No. 2341, Special Conditions ("SC") No. 3, FOP No. O1431, GTC and STC No. 11, and TEX. HEALTH & SAFETY CODE § 382.085(b)].

4. Failed to maintain records for the true vapor pressure of the material stored in the fixed roof tanks. Specifically, the Respondent did not maintain a record demonstrating that the true vapor pressure of the material stored in the fixed-roof tanks with capacities equal to or greater than 25,000 gallons (normal storage capacity) is less than 0.5 pound per square inch absolute ("psia") at the maximum liquid storage temperature [30 TEX. ADMIN. CODE §§ 116.115(b)(2)(E)(i) and (c) and 122.143(4), NSR Permit No. 2341, SC No. 20, FOP No. 01431, GTC and STC No. 11, and TEX. HEALTH & SAFETY CODE § 382.085(b)].

5. Failed to maintain records for the flares containing information and data sufficient to demonstrate compliance with the permit. Specifically, the Respondent did not maintain a record containing the data and information for the 15-minute readings and averaged hourly values for the vent stream flow and composition for the flare flow monitors and composition analyzers and the hourly mass emission rates for the flares to demonstrate compliance with NSR Permit No. 2341 [30 TEX. ADMIN. CODE §§ 116.115(b)(2)(E)(i) and (c) and 122.143(4), NSR Permit No. 2341, SC No. 20, FOP No. O1431, GTC and STC No. 11, and TEX. HEALTH & SAFETY CODE § 382.085(b)].

6. Failed to maintain an emissions record for all loading operations. Specifically, the Respondent did not maintain a record of the monthly emissions that included the calculated VOC emissions from all loading operations over the previous rolling 12-month period, loading spot, control method used, quantity loaded in gallons, name of

the liquid loaded, vapor molecular weight, liquid temperature in degrees Fahrenheit, liquid vapor pressure at the liquid temperature in psia, and liquid throughput for the previous month and rolling 12-months to date [30 TEX. ADMIN. CODE §§ 116.115(c) and 122.143(4), NSR Permit No. 2341, SC Nos. 12.A and 21, FOP No. 01431, GTC and STC No. 11, and TEX. HEALTH & SAFETY CODE § 382.085(b)].

7. Failed to maintain records for the fresh water flow rates for the water scrubbers. Specifically, the Respondent did not maintain a record of the fresh water flow rate to the educator for the Water Scrubber F-750 when each railcar is connected to be controlled [30 TEX. ADMIN. CODE §§ 116.115(b)(2)(E)(i) and (c) and 122.143(4), NSR Permit No. 2341, SC No. 21, FOP No. O1431, GTC and STC No. 11, and TEX. HEALTH & SAFETY CODE § 382.085(b)].

8. Failed to maintain records for each vacuum pump and steam jet. Specifically, the Respondent did not maintain a record of the hours of operation and monthly and rolling 12-month emissions for each vacuum pump and steam jet [30 TEX. ADMIN. CODE §§ 116.115(b)(2)(E)(i) and (c) and 122.143(4), NSR Permit No. 2341, SC Nos. 17 and 21, FOP No. 01431, GTC and STC No. 11, and TEX. HEALTH & SAFETY CODE § 382.085(b)].

9. Failed to maintain records for the calibration of the lower explosive limit ("LEL") detector. Specifically, the Respondent did not maintain a record demonstrating that each LEL detector was calibrated within 30 days of use with a certified pentane gas standard at 25% of the LEL for pentane [30 TEX. ADMIN. CODE §§ 116.115(b)(2)(E)(i) and (c) and 122.143(4), NSR Permit No. 84092, SC No. 20, FOP No. O1431, GTC and STC No. 11, and TEX. HEALTH & SAFETY CODE § 382.085(b)].

10. Failed to maintain records for the functionality test for the LEL detector. Specifically, the Respondent did not maintain a record demonstrating that each LEL detector was tested to ensure functionality within 24 hours of use with a certified gas standard at 25% of the LEL for pentane [30 TEX. ADMIN. CODE §§ 116.115(b)(2)(E)(i) and (c) and 122.143(4), NSR Permit No. 84092, SC No. 4.C.(2), FOP No. 01431, GTC and STC No. 11, and TEX. HEALTH & SAFETY CODE § 382.085(b)].

11. Failed to maintain records for the monitoring of open-ended valve or line. Specifically, the Respondent did not maintain a record demonstrating that an open-ended valve or line in association with planned maintenance, startup, and shutdown ("MSS") activities was monitored once by the end of the 72-hour period following the creation of the open-ended line and monthly thereafter with an approved gas analyzer [30 TEX. ADMIN. CODE §§ 116.115(b)(2)(E)(i) and (c) and 122.143(4), NSR Permit No. 84092, SC No. 5.B, FOP No. 01431, GTC and STC No. 11, and TEX. HEALTH & SAFETY CODE § 382.085(b)].

12. Failed to maintain records for the fixed roof storage tanks used in MSS activities. Specifically, the Respondent did not maintain a record of the fixed roof storage tanks used in MSS activities that included the estimates of emissions; date; time; other information specified for each of the following events: start and completion of

controlled degassing and total volumetric flow, all standing liquid that was removed from the tank or any transfers of low VOC partial pressure liquid to or from the tank including volumes and vapor pressures to reduce tank liquid VOC partial pressure to less than 0.02 psia, if there is liquid in the tank, VOC partial pressure of liquid, start and completion of uncontrolled degassing, and total volumetric flow; and the estimated quantity of each air contaminant, or mixture of air contaminants, emitted with the data and methods used to determine it to demonstrate compliance with NSR Permit No. 84092 [30 TEX. ADMIN. CODE §§ 116.115(b)(2)(E)(i) and (c) and 122.143(4), NSR Permit No. 84092, SC No. 6.D, FOP No. 01431, GTC and STC No. 11, and TEX. HEALTH & SAFETY CODE § 382.085(b)].

13. Failed to maintain records for each vacuum truck used to support planned MSS activities at the Plant. Specifically, the Respondent did not maintain a record of each vacuum truck used to support planned MSS activities at the Plant that included a daily record containing the duration of any periods when air may have been entrained with the liquid transfer, the reason for operating in this manner, whether a "duckbill" or equivalent was used for each liquid transfer made with the vacuum operating, and the VOC exhaust concentration upon commencing each transfer, at the end of each transfer, and at least every hour during each transfer if the vacuum truck exhaust is controlled with a control device other than an engine or oxidizer to demonstrate compliance with NSR Permit No. 84092 [30 Tex. ADMIN. CODE §§ 116.115(b)(2)(E)(i) and (c) and 122.143(4), NSR Permit No. 84092, SC No. 7.B.(3), FOP No. 01431, GTC and STC No. 11, and Tex. HEALTH & SAFETY CODE § 382.085(b)].

14. Failed to maintain records for the frac tanks used in support of MSS activities. Specifically, the Respondent did not maintain a record of the monthly emissions for the frac tanks used in support of MSS activities that included the calculated emissions of VOC from all frac tanks, tank identification number, dates put into and removed from service, control method used, tank capacity and volume of liquid stored in gallons, name of the material stored, VOC molecular weight, and VOC partial pressure at the estimated monthly average material temperature in psia during the previous calendar month and the past consecutive 12-month period [30 TEX. ADMIN. CODE §§ 116.115(c) and 122.143(4), NSR Permit No. 84092, SC No. 8.D, FOP No. 01431, GTC and STC No. 11, and TEX. HEALTH & SAFETY CODE § 382.085(b)].

15. Failed to maintain records containing sufficient information to demonstrate compliance with the applicable Permit by Rule ("PBR") conditions. Specifically, the Respondent did not maintain a record of all MSS activities at the Plant that included the date, time, and duration of each MSS activity [30 TEX. ADMIN. CODE §§ 106.8(c)(2)(B) and (c)(4), 106.263(g)(3), and 122.143(4), FOP No. 01431, GTC and STC Nos. 12 and 13, and TEX. HEALTH & SAFETY CODE § 382.085(b)].

16. Failed to maintain records containing sufficient information to demonstrate compliance with the applicable PBR conditions. Specifically, the Respondent did not maintain a record demonstrating that controls were used for pressurized tanks or tanks vented. Also, the Respondent did not maintain a record for the annual operating

hours of portable and emergency engines and turbines at the Plant [30 TEX. ADMIN. CODE §§ 106.8(c)(2)(B) and (c)(4), 106.476, 106.511, and 122.143(4), FOP No. O1431, GTC and STC Nos. 12 and 13, and TEX. HEALTH & SAFETY CODE § 382.085(b)].

17. Failed to maintain records of the flame for the flares. Specifically, the Respondent did not maintain records demonstrating that the flare system was operated with a flame present at all times and/or have a constant flame for Flare X-401 for a total of 25.35 hours from March 29, 2018 to February 21, 2019, for Flare X-601 for a total of 9.34 hours from February 26, 2018 to February 21, 2019, for Flare X-602 for a total of 1.62 hours from March 28, 2018 to February 21, 2019, for Flare X-695 for a total of 92.28 hours from March 29, 2018 to February 21, 2019, and for Flare X-794 for a total of 0.82 hours from March 29, 2018 to April 14, 2018 [30 TEX. ADMIN. CODE §§ 101.20(1), 116.115(b)(2)(E)(i) and (c), and 122.143(4), 40 CODE OF FEDERAL REGULATIONS ("CFR") § 60.18(c)(2), NSR Permit No. 2341, SC Nos. 5.B and 20, FOP No. 01431, GTC and STC Nos. 1.A and 11, and TEX. HEALTH & SAFETY CODE § 382.085(b)].

18. Failed to limit the waste gas stream flow to Flare X-501. Specifically, the Respondent exceeded the waste gas stream flow limit of 8,440 standard cubic feet per hour ("scf/hr") to Flare X-501 by a range of 8,839 scf/hr to 12,376 scf/hr for 45 one-hour periods from February 22, 2018 to June 29, 2018 [30 TEX. ADMIN. CODE §§ 116.115(c) and 122.143(4), NSR Permit No. 2341, SC No. 4.D, FOP No. 01431, GTC and STC No. 11, and TEX. HEALTH & SAFETY CODE § 382.085(b)].

19. Failed to maintain records of the sulfur dioxide ("SO2") emissions data and fuel sampling data for the fuel oil used as raw material [30 TEX. ADMIN. CODE §§ 112.2(c) and 122.143(4), FOP No. 01431, GTC and STC No. 1.A, and TEX. HEALTH & SAFETY CODE § 382.085(b)].

20. Failed to maintain records of each time an engine is operated for testing and maintenance. Specifically, the Respondent did not maintain a record of each time the emergency engines were operated for testing and maintenance [30 TEX. ADMIN. CODE §§ 117.345(f)(10) and 122.143(4), FOP No. 01431, GTC and STC No. 1.A, and TEX. HEALTH & SAFETY CODE § 382.085(b)].

21. Failed to maintain records of the net heating values for the flares. Specifically, the Respondent did not maintain a record demonstrating that the net heating values for the flared gas was recorded at least once every 15 minutes [30 Tex. ADMIN. CODE §§ 101.20(1), 116.115(b)(2)(E)(i) and (c), and 122.143(4), 40 CFR § 60.18(c)(3)(ii), NSR Permit No. 2341, SC Nos. 5.D and 20, FOP No. O1431, GTC and STC No. 11, and Tex. HEALTH & SAFETY CODE § 382.085(b)].

22. Failed to maintain records of the actual exit velocity for the flares. Specifically, the Respondent did not maintain a record demonstrating that the actual exit velocity for the flares was recorded at least once every 15 minutes [30 TEX. ADMIN. CODE §§ 116.115(b)(2)(E)(i) and (c) and 122.143(4), NSR Permit No. 2341, SC Nos. 5.D and 20, FOP No. 01431, GTC and STC No. 11, and TEX. HEALTH & SAFETY CODE § 382.085(b)].

23. Failed to maintain records of the maintenance for a stationary reciprocating internal combustion engine ("RICE"). Specifically, the Respondent did not maintain a record of the maintenance conducted on each stationary RICE [30 TEX. ADMIN. CODE §§ 101.20(2), 113.1090, and 122.143(4), 40 CFR § 63.6655(e), FOP No. 01431, GTC and STC No. 1.A, and TEX. HEALTH & SAFETY CODE § 382.085(b)].

24. Failed to maintain records of the hours of operation for a stationary RICE. Specifically, the Respondent did not maintain a record of the hours of operation for each stationary RICE that is recorded through the non-resettable hour meter [30 Tex. ADMIN. CODE §§ 101.20(2), 113.1090, and 122.143(4), 40 CFR § 63.6655(e), FOP No. 01431, GTC and STC No. 1.A, and Tex. HEALTH & SAFETY CODE § 382.085(b)].

25. Failed to maintain records of the emissions from all storage tanks. Specifically, the Respondent did not maintain a record of the VOC emissions from all storage tanks during the previous calendar month and the past consecutive 12-month period that included the tank identification number, control method used, tank capacity in gallons, name of the material stored, VOC molecular weight, VOC monthly average and the maximum temperatures in degrees Fahrenheit, VOC vapor pressure at the monthly average material temperature in psia, and VOC throughput for the previous month and year-to-date [30 TEX. ADMIN. CODE §§ 116.115(b)(2)(E) and (c) and 122.143(4), NSR Permit No. 2341, SC Nos. 4.E and 21, FOP No. 01431, GTC and STC No. 11, and TEX. HEALTH & SAFETY CODE § 382.085(b)].

26. Failed to maintain records for the flare monitors. Specifically, the Respondent did not maintain records that contained the data and information for the flow rate for Water Scrubber F-700 when waste gases were directed to the scrubber [30 TEX. ADMIN. CODE §§ 116.115(b)(2)(E) and (c) and 122.143(4), NSR Permit No. 2341, SC Nos. 15.A and 20, FOP No. O1431, GTC and STC No. 11, and TEX. HEALTH & SAFETY CODE § 382.085(b)].

27. Failed to maintain records of the gas fuel usage for each combustion device. Specifically, the Respondent did not maintain a record demonstrating that the gas fuel usage for each combustion device was recorded monthly [30 TEX. ADMIN. CODE §§ 116.115(b)(2)(E) and (c) and 122.143(4), NSR Permit No. 2341, SC Nos. 14 and 21, FOP No. 01431, GTC and STC No. 11, and TEX. HEALTH & SAFETY CODE § 382.085(b)].

28. Failed to maintain records of the specifications for each diesel engine. Specifically, the Respondent did not maintain a record demonstrating that each diesel engine manufacturer's design and operation specifications and all emission-related maintenance requirements were maintained at the Plant [30 TEX. ADMIN. CODE §§ 116.115(b)(2)(E) and (c) and 122.143(4), NSR Permit No. 2341, SC Nos. 18 and 21, FOP No. 01431, GTC and STC No. 11, and TEX. HEALTH & SAFETY CODE § 382.085(b)].

29. Failed to maintain records of the downstream samples for the Carbon Adsorption System ("CAS"). Specifically, the Respondent did not maintain a record demonstrating that the CAS was sampled downstream of the first carbon canister and the concentration was recorded at least once every hour of the CAS run time to determine

breakthrough of the VOC during planned MSS activities [30 TEX. ADMIN. CODE §§ 116.115(b)(2)(E) and (c) and 122.143(4), NSR Permit No. 84092, SC No. 10.A.(2), FOP No. 01431, GTC and STC No. 11, and TEX. HEALTH & SAFETY CODE § 382.085(b)].

30. Failed to maintain records of the audio, olfactory, and visual ("AOV") checks. Specifically, the Respondent did not maintain a record demonstrating that the AOV checks for VOC leaks within the heavy liquid components were being conducted at least once per shift, not to exceed 12 hours [30 TEX. ADMIN. CODE §§ 116.115(b)(2)(E) and (c) and 122.143(4), NSR Permit No. 2341, SC Nos. 10.A and 21, FOP No. 01431, GTC and STC No. 11, and TEX. HEALTH & SAFETY CODE § 382.085(b)].

31. Failed to maintain records of the relief valve monitoring. Specifically, the Respondent did not maintain a record of the relief valve monitoring demonstrating that the emissions from any relief valve that vented to the atmosphere were monitored within 24 hours of the release [30 TEX. ADMIN. CODE §§ 115.354(4) and 122.143(4), FOP No. O1431, GTC and STC No. 1.A, and TEX. HEALTH & SAFETY CODE § 382.085(b)].

32. Failed to maintain records for new connector monitoring. Specifically, the Respondent did not maintain a record demonstrating that all new connectors were monitored and checked for leaks within 30 days of being placed in VOC service [30 TEX. ADMIN. CODE §§ 115.354(4) and 122.143(4), FOP No. 01431, GTC and STC No. 1.A, and TEX. HEALTH & SAFETY CODE § 382.085(b)].

33. Failed to maintain records of the calibration of the monitoring instruments. Specifically, the Respondent did not maintain a record demonstrating that the calibration of each monitoring instrument used on components and process areas was performed [30 TEX. ADMIN. CODE §§ 115.356(2)(D) and 122.143(4), FOP No. 01431, GTC and STC No. 1.A, and TEX. HEALTH & SAFETY CODE § 382.085(b)].

34. Failed to maintain records of the exempt components. Specifically, the Respondent did not maintain a record by process unit that identified and justified each exemption by component claimed under 30 TEX. ADMIN. CODE § 115.357 [30 TEX. ADMIN. CODE §§ 101.20(1), 115.356(3)(C), and 122.143(4), 40 CFR § 60.480(d)(1), FOP No. 01431, GTC and STC No. 1.A, and TEX. HEALTH & SAFETY CODE § 382.085(b)].

35. Failed to maintain records of all equipment subject to the 40 CFR Part 60 Subpart VV requirements on site [30 TEX. ADMIN. CODE §§ 101.20(2), 113.530, and 122.143(4), 40 CFR § 60.486(e), FOP No. 01431, GTC and STC No. 1.A, and TEX. HEALTH & SAFETY CODE § 382.085(b)].

36. Failed to maintain records of repairs on fugitive components. Specifically, the Respondent did not maintain a record of the first and/or final repair for two fugitive components that were determined to be leaking in March 2018 and August 2018 [30 Tex. ADMIN. CODE §§ 101.20(1), 115.356(2)(E), and 122.143(4), 40 CFR § 60.486(c), FOP No. O1431, GTC and STC No. 1.A, and Tex. HEALTH & SAFETY CODE § 382.085(b)].

# **Corrective Actions/Technical Requirements**

#### **Corrective Action(s) Completed:**

The Respondent implemented the following corrective measures:

a. On June 29, 2018, amended NSR Permit No. 2341 that removed the waste gas stream flow limit to Flare X-501;

b. On August 21, 2018, began maintaining the records for the first and final repair for the two fugitive components that were determined to be leaking in March 2018 and August 2018;

c. By February 21, 2019, added a third pilot light to Flare X-794, Flare X-401, Flare X-601, and Flare X-695 and implemented a program to conduct visual pilot confirmations in the event instrumentation indicate a loss of the pilot in order to ensure that the flare systems are operated with a flame present at all times and/or have a constant flame for Flare X-401, Flare X-601, Flare X-602, Flare X-695, and Flare X-794;

d. On October 30, 2019, began maintaining records in the process control data historian demonstrating that the gas fuel usage for each combustion device is recorded monthly;

e. On January 31, 2020, began maintaining the records for the SO2 emissions data and fuel sampling data for the fuel oil used as raw material;

f. On January 31, 2020, ceased operating the CAS;

g. On March 10, 2020, implemented measures and procedures for calculating the monthly and rolling 12-month VOC emissions from all storage tanks and began maintaining records for the VOC emissions from all storage tanks that includes the data and information as specified in NSR Permit No. 2341;

h. By June 30, 2020, implemented procedures for the records needed for the emergency engines and began maintaining records for each time the emergency engines are operated for testing and maintenance;

i. On June 30, 2020, implemented procedures for the records needed for each stationary RICE and began maintaining records for the hours of operation of each stationary RICE that is recorded through the non-resettable hour meter;

j. On June 30, 2020, implemented procedures for the records needed for the AOV checks for VOC leaks and began maintaining records demonstrating that the AOV checks for VOC leaks within the heavy liquid components are being conducted at least once per shift, not to exceed 12 hours;

k. On June 30, 2020, implemented procedures for the records needed for the relief valve monitoring and began maintaining records for the relief valve monitoring demonstrating that the emissions from any relief valve that vented to the atmosphere are monitored within 24 hours of the release;

1. On June 30, 2020, implemented procedures for the records needed for the new connector monitoring and began maintaining records for the new connector monitoring demonstrating that all new connectors are monitored and checked for leaks within 30 days of being placed in VOC service;

m. On June 30, 2020, implemented procedures for the records needed for the calibration of the monitoring instruments and began maintaining records for the calibration of the monitoring instruments demonstrating that the calibration of each monitoring instrument used on components and process areas are performed;

n. On June 30, 2020, implemented procedures for the records needed for exempt components and began maintaining records by the process unit that identifies and justifies each exemption by component claimed under 30 TEX. ADMIN. CODE § 115.357;

o. On June 30, 2020, implemented procedures for the records needed for the equipment subject to the 40 CFR Part 60 Subpart VV requirements and began maintaining records for all equipment subject to the 40 CFR Part 60 Subpart VV requirements;

p. On July 1, 2020, implemented procedures for the records needed for the flared gas and began maintaining records demonstrating that the net heating values for the flared gas are recorded at least once every 15 minutes;

q. On July 1, 2020, implemented procedures for the records needed for the flares and began maintaining records demonstrating that the actual exit velocity for the flares is recorded at least once every 15 minutes;

r. By July 1, 2020, designed documentation for establishing the flow rate for the Water Scrubber F-700 and began maintaining records that contained the data and information for the flow rate for Water Scrubber F-700 when waste gases are directed to the scrubber in order to demonstrate compliance with NSR Permit No. 2341;

s. On July 20, 2020, began maintaining the records for the maintenance conducted on each stationary RICE; and

t. On July 20, 2020, began maintaining records demonstrating that each diesel engine manufacturer's design and operation specifications and all emission-related maintenance requirements are maintained at the Plant.

# **Technical Requirements:**

The Order will require the Respondent to:

a. Within 30 days:

i. Begin maintaining the records on-site for the fixed storage tanks including the type of VOC stored, the starting and ending dates of when the material is stored, and the true vapor pressure at the average monthly storage temperature of the stored liquids in the fixed roof storage tanks;

ii. Begin maintaining the records of the installation and calibrations for the totalizing fuel flow meters;

iii. Begin maintaining records to demonstrate that the true vapor pressure of the material stored in the fixed-roof tanks with capacities equal to or greater than 25,000 gallons (normal storage capacity) is less than 0.5 psia at the maximum liquid storage temperature and maintain these records for at least five years;

iv. Begin maintaining records that contain the information and data for the 15-minute readings and averaged hourly values for the vent stream flow and composition for the flare flow monitors and composition analyzers and the hourly mass emission rates for the flares to demonstrate compliance with NSR Permit No. 2341 and maintain these records for at least five years;

v. Begin maintaining and updating the monthly emissions records for all truck, tank wagon, railcar, drumming, and tote loading operations that includes the data and information as described NSR Permit No. 2341 and maintain these records for at least five years;

vi. Begin maintaining the records of the fresh water flow rate to the educator for the Water Scrubber F-750 when each railcar is connected to be controlled and maintain these records for at least five years;

vii. Begin maintaining the records of the hours of operation and monthly and rolling 12-month emissions for each vacuum pump and steam jet and maintain these records for at least five years;

viii. Begin maintaining records demonstrating that each LEL detector is calibrated within 30 days of use with a certified pentane gas standard at 25% of the LEL for pentane and maintain these records for at least five years;

ix. Begin maintaining records demonstrating that each LEL detector is tested to ensure functionality within 24 hours of use with a certified gas standard at 25% of the LEL for pentane and maintain these records for at least five years;

x. Begin maintaining records demonstrating that an open-ended valve or line in association with planned MSS activities is monitored once by the end of the 72-hour period following the creation of the open-ended line and monthly thereafter with an approved gas analyzer and maintain these records for at least five years;

xi. Begin maintaining the records for the fixed roof storage tanks used in MSS activities that includes the data and information as described in NSR Permit No. 84092 and maintain these records for at least five years;

xii. Begin maintaining the records for the vacuum trucks used to support planned MSS activities at the Plant that includes the data and information as described in NSR Permit No. 84092 and maintain these records for at least five years;

xiii. Begin maintaining the records for monthly emissions for the frac tanks used in support of MSS activities that includes the data and information as specified in NSR Permit No. 84092 and maintain these records for at least five years;

xiv. Begin maintaining the records for all MSS activities at the Plant that includes the date, time, and duration of each MSS activity and maintain these records for at least five years;

xv. Begin maintaining the records of controls used for pressurized tanks or tanks vented and annual operating hours of portable and emergency engines and turbines at the Plant and maintain the records for at least five years; and

xvi. Submit an administratively complete permit amendment application for NSR Permit No. 2341 to authorize the chemicals used in storage and loading operations that are not on the Approved Chemicals List

b. Respond completely and adequately, as determined by the TCEQ, to all requests for information concerning the permit amendment application by any deadline specified in writing.

c. Within 45 days, submit written certification to demonstrate compliance with a.

d. Within 180 days, submit written certification that either the amendment for NSR Permit No. 2341 has been obtained or the use of the unauthorized chemicals not on the Approved Chemicals List has ceased until such time that the appropriate authorization is obtained, and include detailed supporting documentation including photographs, receipts, and/or other records to demonstrate compliance.

#### **Contact Information**

TCEQ Attorney: N/A

**TCEQ Enforcement Coordinator:** Danielle Porras, Enforcement Division, Enforcement Team 2, MC R-12, (713) 767-3682; Michael Parrish, Enforcement Division, MC 219, (512) 239-2548

**Respondent:** Brian Bence, Senior Director, SI Group, Inc., 702 Farm-to-Market Road 523, Freeport, Texas 77541

Michael Farnell, Jr., Senior Vice President and General Counsel, SI Group, Inc., 702 Farm-to-Market Road 523, Freeport, Texas 77541

**Respondent's Attorney:** J. Scott Janoe, Partner, Baker Botts, 910 Louisiana Street, Houston, Texas 77002-4995

COMMISSION COMUNICA CO	Policy F	Pe Revision 4 (April 2014	enalty Calcu	ulatio	n Worksl	heet (PC	,	Revision March 2	26, 2014
DATES	Assigned						1		
	PCW	23-Feb-2023	Screening 22-S	ep-2020	EPA Due				
RESPO		TY INFORMATI	ON						
Rec	Respondent g. Ent. Ref. No.	SI Group, Inc. RN100218999							
	ty/Site Region				Major/I	Minor Source	Major		
CASE I	NFORMATION								
	f./Case ID No.				No.	of Violations			
Med	Docket No. lia Program(s)	2020-1255-AIR-	E		Governmen	Order Type t/Non-Profit			
incu	Multi-Media					Coordinator	Danielle Porra		
۸dr	nin Penalty ¢	Limit Minimum	\$0 Maxi	imum [	\$25,000	EC's Team	Enforcement	Feam 2	
Au			φo		\$2 <b>5,000</b>				
			Penalty C	Calcula	tion Secti	on			
ΤΟΤΑΙ	L BASE PENA	ALTY (Sum of	violation base	e penalt	ties)		Subtotal 1	\$8	8,500
ADJUS	STMENTS (+	/-) TO SUBT	OTAL 1						
		btained by multiplying	g the Total Base Penalty	(Subtotal 1 90.0%	) by the indicated p Adjustment		tals 2, 3, & 7	¢7	9,650
	compliance m		t for one NOV with		y			<b>"</b> , <b>"</b>	9,030
	<b></b>	containing a der	t for one NOV with nial of liability, and						
	Notes	Reduction for fo	ur notices of intent	to conduc	ct an audit, thr	ee disclosures			
		of vi	iolations, and a Hig	h Perform	er Classificatio	n.			
	Culpability	No		0.0%	Enhancement		Subtotal 4		\$0
	Natas	The De				evie			·
	Notes	The Re	espondent does not	meet the	culpability crit	eria.			
	Good Faith Eff	ort to Comply T	otal Adjustments				Subtotal 5	-\$1	2,991
							Subtotal	Ψ-	2/331
	Economic Ben	efit		0.0%	Enhancement*		Subtotal 6		\$0
		Total EB Amounts Cost of Compliance	\$14,376		d at the Total EB \$	Amount			
	Estimated		\$141,000						
SUM (	OF SUBTOTA	LS 1-7				E	inal Subtotal	\$15	5,159
OTHE	R FACTORS	AS JUSTICE M	AY REQUIRE		0.0%		Adjustment		\$0
Reduces o	or enhances the Fina	I Subtotal by the indi	cated percentage.	ŀ			_ 1	L	
	Notes								
						Final Per	alty Amount	\$15	5,159
STATU	JTORY LIMI	T ADJUSTMEN	Т			Final Asse	ssed Penalty	\$15	5,159
DEEE					20.0%	Reduction	Adiustus aut	_#2	1 021
DEFEF Reduces t		enalty by the indicate	d percentage.		20.0%	Reduction	Adjustment	-\$3	1,031
	NI - + -			over a dit	d oottlaws sub				
	Notes		Deferral offered for	expedited	u settiement.				
PAYA	BLE PENALT	Y						\$12	4,128

	Other written NOVs	0	0%
	Any agreed final enforcement orders containing a denial of liability (number of orders meeting criteria)	4	80%
Orders	Any adjudicated final enforcement orders, agreed final enforcement orders without a denial of liability, or default orders of this state or the federal government, or any final prohibitory emergency orders issued by the commission	1	25%
Judgments	Any non-adjudicated final court judgments or consent decrees containing a denial of liability of this state or the federal government ( <i>number of judgments or consent decrees meeting criteria</i> )	0	0%
and Consent Decrees	Any adjudicated final court judgments and default judgments, or non-adjudicated final court judgments or consent decrees without a denial of liability, of this state or the federal government	0	0%
Convictions	Any criminal convictions of this state or the federal government ( <i>number of counts</i> )	0	0%
Emissions	Chronic excessive emissions events (number of events)	0	0%
Audits	Letters notifying the executive director of an intended audit conducted under the Texas Environmental, Health, and Safety Audit Privilege Act, 74th Legislature, 1995 (number of audits for which notices were submitted)	4	-4%
Addits	Disclosures of violations under the Texas Environmental, Health, and Safety Audit Privilege Act, 74th Legislature, 1995 ( <i>number of audits for which violations were disclosed</i> )	3	-6%
	1		<b></b>
	Environmental management systems in place for one year or more	No	0%
Other	Voluntary on-site compliance assessments conducted by the executive director under a special assistance program	No	0%
other	Participation in a voluntary pollution reduction program	No	0%
	Early compliance with, or offer of a product that meets future state or federal government environmental requirements	No	0%
	Adjustment Per	centage (Sub	ototal 2)
<b>Repeat Violator</b>	(Subtotal 3)		
No	Adjustment Per	centage (Sub	total 3)
Compliance Hist	ory Person Classification (Subtotal 7)		
Lich Dev	Former Adjustment Per	centage (Sub	total 7)
High Per			
Compliance Hist	ory Summary		
Compliance Hist		anial of liability	1
		to conduct an	
Compliance Hist Compliance History	Enhancement for one NOV with same/similar violations, four orders containing a d and one order without a denial of liability. Reduction for four notices of intent	to conduct an on.	
Compliance Hist Compliance History Notes	Enhancement for one NOV with same/similar violations, four orders containing a d and one order without a denial of liability. Reduction for four notices of intent audit, three disclosures of violations, and a High Performer Classification	to conduct an on.	3, & 7)

#### Respondent SI Group, Inc. **Case ID No.** 59891 Reg. Ent. Reference No. RN100218999 Media Air

Screening Date 22-Sep-2020

Enf. Coordinator Danielle Porras

Component Number of...

NOVs

#### **Compliance History Worksheet** >> Compliance History *Site* Enhancement (Subtotal 2)

Written notices of violation ("NOVs") with same or similar violations as those in

the current enforcement action (number of NOVs meeting criteria)

PCW Revision March 26, 2014

Adjust.

5%

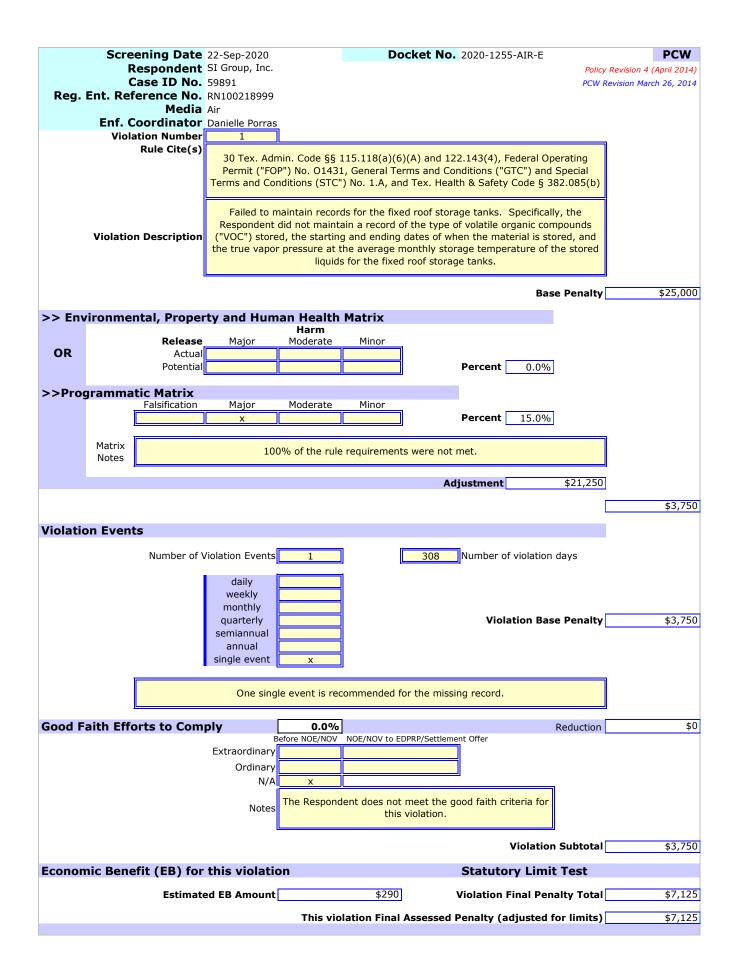
#### **Docket No.** 2020-1255-AIR-E

Policy Revision 4 (April 2014)

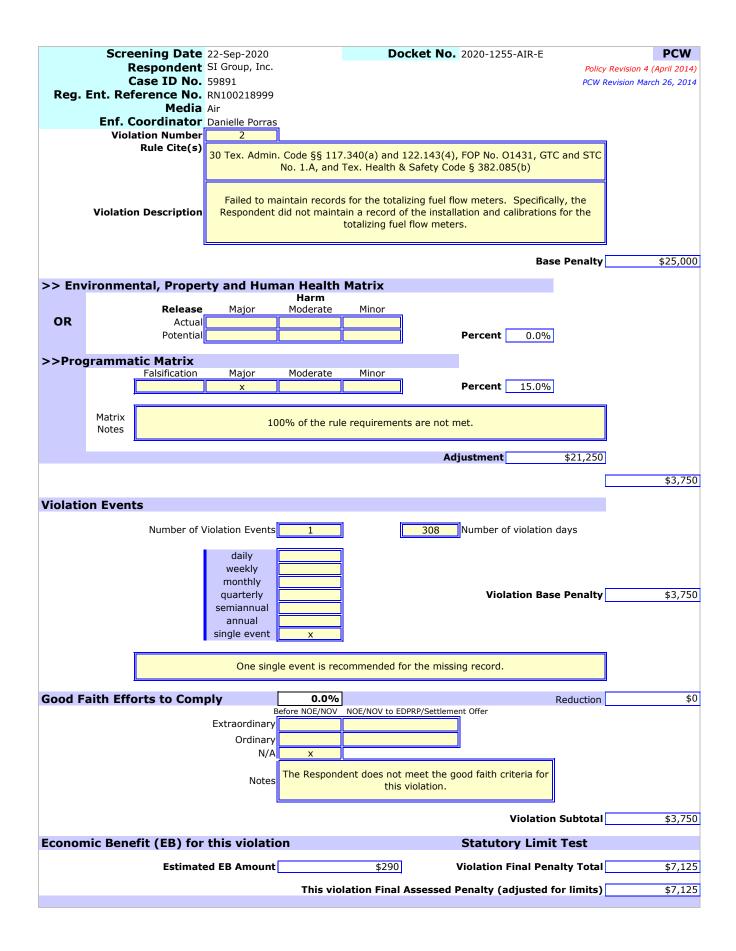
Number

1

#### PCW



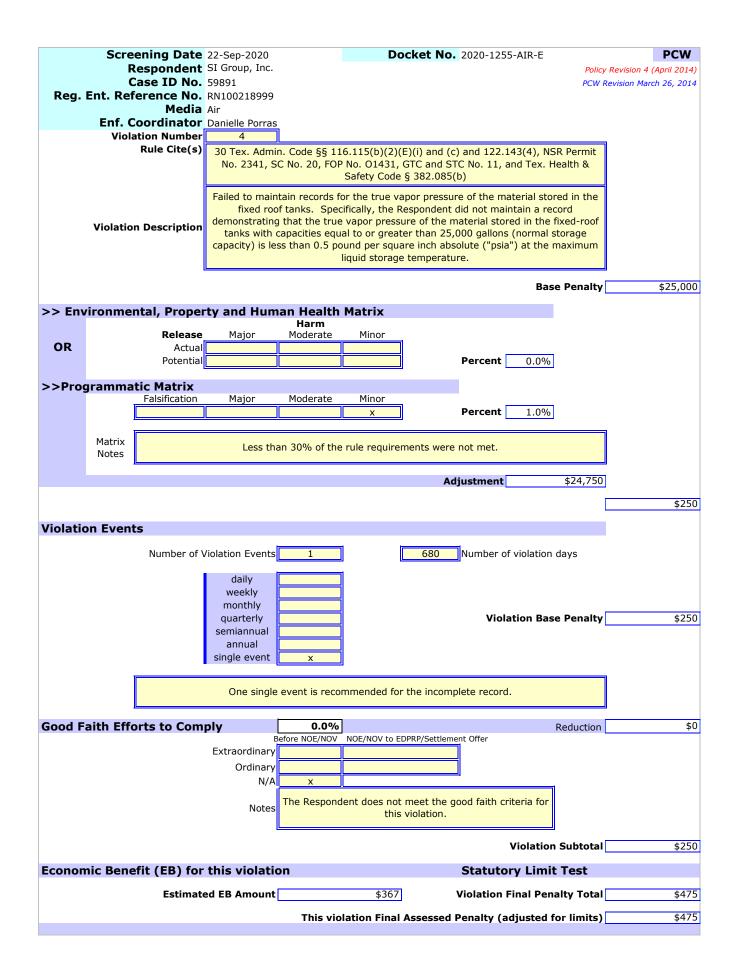
	E	conomic	Benefit	Wo	rksheet		
Respondent	SI Group, Inc.						
Case ID No.	59891						
Reg. Ent. Reference No.	RN100218999						
Media	Air					Percent Interest	Years of
Violation No.	1					Percent Interest	Depreciation
						5.0	15
	Item Cost	<b>Date Required</b>	Final Date	Yrs	Interest Saved	Costs Saved	EB Amount
Item Description		-					
Delayed Costs				_			
Equipment				0.00	\$0	\$0	\$0
Buildings				0.00	\$0	\$0	\$0
Other (as needed)				0.00	\$0	\$0	\$0
Engineering/Construction				0.00	\$0	\$0	\$0
Land				0.00	\$0	n/a	\$0
Record Keeping System	\$1,500	19-Nov-2019	1-Oct-2023	3.87	\$290	n/a	\$290
Training/Sampling				0.00	\$0	n/a	\$0
Remediation/Disposal				0.00	\$0	n/a	\$0
Permit Costs				0.00	\$0	n/a	\$0
Other (as needed)				0.00	\$0	n/a	\$0
Notes for DELAYED costs	VOC stored, the average	the starting and e monthly storage t	nding dates of emperature of	when th the stor	ne material is store red liquids in the fi	corage tanks includir ed, and the true vap xed roof storage tar mated date of comp	or pressure at oks. The Date
Avoided Costs	ANNUA	LIZE avoided co	osts before er	ntering	item (except for	r one-time avoide	d costs)
Disposal				0.00	\$0	\$0	\$0
Personnel				0.00	\$0	\$0	\$0
Inspection/Reporting/Sampling				0.00	\$0	\$0	\$0
Supplies/Equipment				0.00	\$0	\$0	\$0
Financial Assurance				0.00	\$0	\$0	\$0
ONE-TIME avoided costs				0.00	\$0	\$0	\$0
Other (as needed)				0.00	\$0	\$0	\$0
Notes for AVOIDED costs							
Approx. Cost of Compliance		\$1,500			TOTAL		\$290



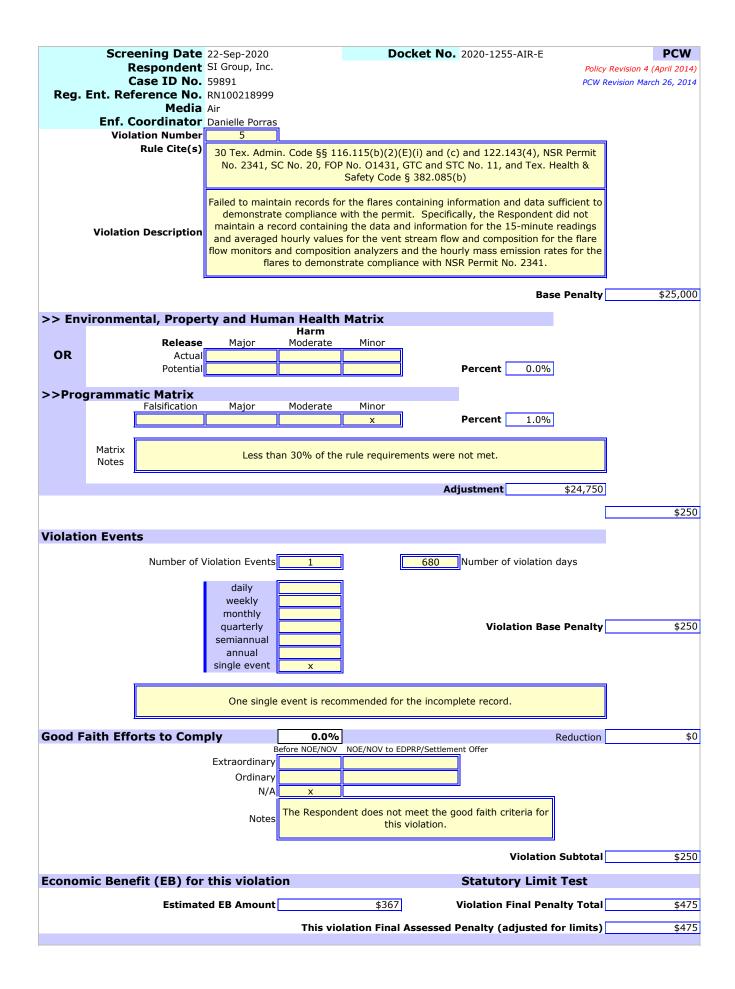
	E	conomic	Benefit	Wo	rksheet		
Respondent	SI Group, Inc.						
Case ID No.							
Reg. Ent. Reference No.							
Media Violation No.	Air					Percent Interest	Years of Depreciation
Violation No.	-					5.0	15
		Data Daminat		N.			
		Date Required	Final Date	Yrs	Interest Saved	Costs Saved	EB Amount
Item Description							
Delayed Costs							
Equipment				0.00	\$0	\$0	\$0
Buildings				0.00	\$0	\$0	\$0
Other (as needed)				0.00	\$0	\$0	\$0
Engineering/Construction				0.00	\$0	\$0	\$0
Land				0.00	\$0	n/a	\$0
Record Keeping System	\$1,500	19-Nov-2019	1-Oct-2023	3.87	\$290	n/a	\$290
Training/Sampling				0.00	\$0	n/a	\$0
Remediation/Disposal				0.00	\$0	n/a	\$0
Permit Costs				0.00	\$0	n/a	\$0
Other (as needed)				0.00	\$0	n/a	\$0
		St to begin maint				calibrations for the	
Notes for DELAYED costs	flow meter	s. The Date Requ		compli	ance.		ated date of
Avoided Costs	flow meter			compli	ance. item (except for	one-time avoide	ated date of
Avoided Costs Disposal	flow meter			compli ntering 0.00	ance. item (except for \$0	r <b>one-time avoide</b> \$0	ated date of d costs) \$0
Avoided Costs Disposal Personnel	flow meter			compli tering 0.00 0.00	ance. item (except for \$0 \$0	<b>one-time avoide</b> \$0 \$0	ated date of d costs) \$0 \$0
Avoided Costs Disposal Personnel Inspection/Reporting/Sampling	flow meter			compli ntering 0.00 0.00 0.00	ance. item (except for \$0 \$0 \$0	r one-time avoide \$0 \$0 \$0	ated date of d costs) \$0 \$0 \$0
Avoided Costs Disposal Personnel (nspection/Reporting/Sampling Supplies/Equipment	flow meter			<b>tering</b> 0.00 0.00 0.00 0.00 0.00	ance. item (except for \$0 \$0 \$0 \$0 \$0	<b>one-time avoide</b> \$0 \$0 \$0 \$0 \$0	ated date of d costs) \$0 \$0 \$0 \$0 \$0
Avoided Costs Disposal Personnel Inspection/Reporting/Sampling Supplies/Equipment Financial Assurance	flow meter			compli 0.00 0.00 0.00 0.00 0.00	ance. item (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0	<b>one-time avoide</b> \$0 \$0 \$0 \$0 \$0 \$0	ated date of (d costs) (s) (s) (s) (s) (s) (s) (s) (
Avoided Costs Disposal Personnel Inspection/Reporting/Sampling Supplies/Equipment Financial Assurance ONE-TIME avoided costs	flow meter			compli tering 0.00 0.00 0.00 0.00 0.00 0.00	ance. item (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	<b>one-time avoide</b> \$0 \$0 \$0 \$0 \$0 \$0 \$0	ated date of \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0
Avoided Costs Disposal Personnel Inspection/Reporting/Sampling Supplies/Equipment Financial Assurance	flow meter			compli 0.00 0.00 0.00 0.00 0.00	ance. item (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0	<b>one-time avoide</b> \$0 \$0 \$0 \$0 \$0 \$0	ated date of (d costs) (s) (s) (s) (s) (s) (s) (s) (
Avoided Costs Disposal Personnel Inspection/Reporting/Sampling Supplies/Equipment Financial Assurance ONE-TIME avoided costs	flow meter			compli tering 0.00 0.00 0.00 0.00 0.00 0.00	ance. item (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	<b>one-time avoide</b> \$0 \$0 \$0 \$0 \$0 \$0 \$0	ated date of \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0

		ening Date		Docket No. 2020-1255-AIR-E	PCW
		espondent ase ID No.	SI Group, Inc. 59891		Revision 4 (April 2014) Revision March 26, 2014
Reg. E		erence No.	RN100218999		
	Enf. C	Media oordinator	Air Danielle Porras		
		tion Number	3		
		Rule Cite(s)	Review ("NSR") Permit No	116.115(c), 116.116(a)(2), and 122.143(4), New Source o. 2341, Special Conditions ("SC") No. 3, FOP No. 01431, 11, and Tex. Health & Safety Code § 382.085(b)	
	Violatio	n Description	Approved Chemicals List rule. Specifically, the Re	and loading operations to the chemicals appearing on the t or chemicals that are authorized through a permit a by espondent did not limit the chemicals used in the storage is to those appearing on the Approved Chemicals List.	
				Base Penalty	\$25,000
>> Envii	ronmer	ntal, Propei	ty and Human Healt Harm	h Matrix	
OR		Release	Major Moderate		
OK		Actual Potential		Percent 15.0%	
>>Progr	rammat	tic Matrix			
		Falsification	Major Moderate	Percent 0.0%	
	l T				
	Matrix Notes			een exposed to insignificant amounts of pollutants that do trive of human health or environmental receptors.	
				Adjustment \$21,250	
					\$3,750
Violation	1 Event	'c			
Violation	LVCII		/iolation Events	308 Number of violation days	
			daily weekly monthly quarterly x semiannual annual single event	Violation Base Penalty	\$15,000
		Four quarter		d from the November 19, 2019 investigation date to the er 22, 2020 screening date.	
Good Fai	ith Effo	orts to Com			\$0
			Before NOE/NC Extraordinary	V NOE/NOV to EDPRP/Settlement Offer	
			Ordinary		
			N/A × Notes The Respo	ndent does not meet the good faith criteria for this violation.	
				Violation Subtotal	\$15,000
Economi	ic Bene	fit (EB) for	this violation	Statutory Limit Test	
		Estimate	ed EB Amount	\$1,092 Violation Final Penalty Total	\$28,500
			This v	violation Final Assessed Penalty (adjusted for limits)	\$28,500

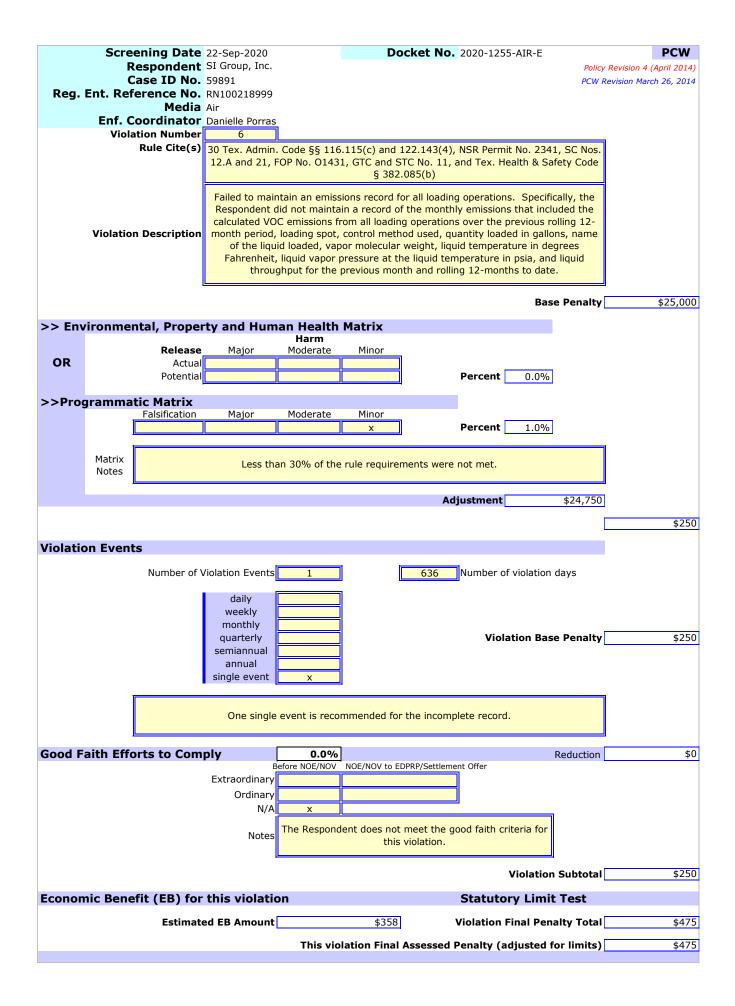
	E	conomic	Benefit	Wo	rksheet		
Respondent	SI Group, Inc.						
Case ID No.							
Reg. Ent. Reference No.							
Media							Years of
Violation No.						Percent Interest	Depreciation
Violation No.	5					5.0	15
	Item Cost	Date Required	Final Date	Yrs	Interest Saved	Costs Saved	EB Amount
Item Description	Item cost	Bute Required	That Date		Interest Suveu		ED Amount
Item Description							
Delayed Costs							
Equipment	(			0.00	\$0	\$0	\$0
Buildings				0.00	\$0	\$0	\$0
Other (as needed)				0.00	\$0	\$0	\$0
Engineering/Construction				0.00	\$0	\$0	\$0
Land				0.00	\$0	n/a	\$0
Record Keeping System				0.00	\$0	n/a	\$0
Training/Sampling				0.00	\$0	n/a	\$0
Remediation/Disposal				0.00	\$0	n/a	\$0
Permit Costs	\$5,000	19-Nov-2019	1-Apr-2024	4.37	\$1,092	n/a	\$1,092
Other (as needed)				0.00	\$0	n/a	\$0
	Estimated	cost to obtain an	amondmont for		armit No. 2241 to	authorize the chemi	colo usod in
Notes for DELAYED costs	storage and					Is List. The Date Re	quired is the
		investigation d	ate and the Fin	al Date	is the estimated d	ate of compliance.	
Avoided Costs	ANNU	ALIZE avoided c	osts before er	ntering	item (except for	r one-time avoide	d costs)
Disposal				0.00	\$0	\$0	\$0
Personnel				0.00	\$0	\$0	\$0
Inspection/Reporting/Sampling				0.00	\$0	\$0	\$0
Supplies/Equipment				0.00	\$0	\$0	\$0
Financial Assurance				0.00	\$0	\$0	\$0
ONE-TIME avoided costs				0.00	\$0	\$0	\$0
Other (as needed)				0.00	\$0	\$0	\$0
Notes for AVOIDED costs							
Approx. Cost of Compliance		\$5,000			TOTAL		\$1,092



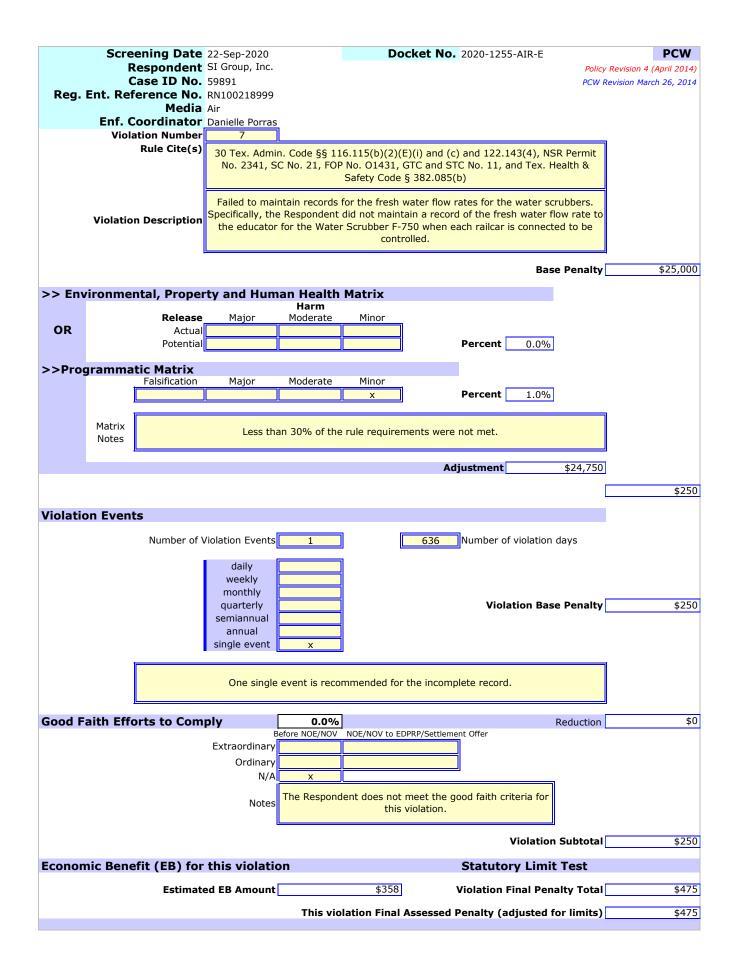
	E	conomic	Benefit	Wo	rksheet		
Respondent							
Case ID No.							
Reg. Ent. Reference No.							
Media						Percent Interest	Years of
Violation No.	4						Depreciation
						5.0	15
	Item Cost	<b>Date Required</b>	Final Date	Yrs	Interest Saved	Costs Saved	EB Amount
Item Description	l i i i i i i i i i i i i i i i i i i i						
-							
Delayed Costs				_			
Equipment				0.00	\$0	\$0	\$0
Buildings				0.00	\$0	\$0	\$0
Other (as needed)				0.00	\$0	\$0	\$0
Engineering/Construction				0.00	\$0	\$0	\$0
Land	+1 500	42.01.2010	4 0 1 0000	0.00	\$0	n/a	\$0
Record Keeping System	\$1,500	12-Nov-2018	1-Oct-2023	4.89	\$367	n/a	\$367
Training/Sampling Remediation/Disposal				0.00	\$0 \$0	n/a n/a	\$0 \$0
Permit Costs				0.00	\$0	n/a	\$0
Other (as needed)				0.00	\$0	n/a	\$0
Notes for DELAYED costs	capacity) is le	ess than 0.5 psia	at the maximur Required is the	n liquid effective	storage temperati	25,000 gallons (non ure and maintain the ed permit and the Fi	ese records for
Avoided Costs		ALIZE avoided o	osts before e	nterina	item (except for	r one-time avoide	d costs)
Disposal				0.00	\$0	\$0	\$0
Personnel				0.00	\$0	\$0	\$0
Inspection/Reporting/Sampling				0.00	\$0	\$0	\$0
Supplies/Equipment				0.00	\$0	\$0	\$0
Financial Assurance				0.00	\$0	\$0	\$0
ONE-TIME avoided costs				0.00	\$0	\$0	\$0
Other (as needed)				0.00	\$0	\$0	\$0
Notes for AVOIDED costs							



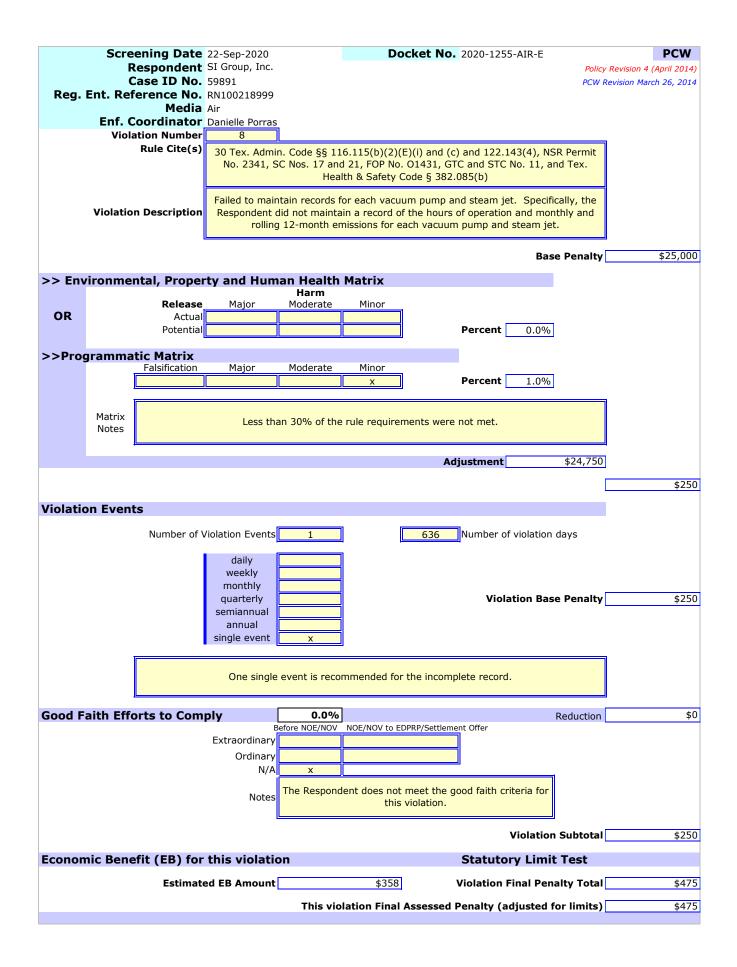
	E	conomic	Benefit	Wo	rksheet		
Respondent	• •						
Case ID No.							
Reg. Ent. Reference No.							
Media Violation No.						Percent Interest	Years of Depreciation
Violation No.	5					5.0	15
	Item Cost	Date Required	Final Date	Yrs	Interest Saved	Costs Saved	EB Amount
Item Description	20000	Bute Required	i illa Dute		1110100000000000		20741104110
Delayed Costs				-			
Equipment				0.00	\$0	\$0	\$0
Buildings				0.00	\$0	\$0	\$0
Other (as needed) Engineering/Construction				0.00	\$0 \$0	\$0 \$0	\$0 \$0
Land				0.00	\$0	n/a	\$0
Record Keeping System	\$1,500	12-Nov-2018	1-Oct-2023	4.89	\$367	n/a	\$367
Training/Sampling				0.00	\$0	n/a	\$0
Remediation/Disposal				0.00	\$0	n/a	\$0
Permit Costs				0.00	\$0	n/a	\$0
Other (as needed)				0.00	\$0	n/a	\$0
Notes for DELAYED costs	readings and and composi with NSR Pe	averaged hourly tion analyzers and ermit No. 2341 and	values for the v d the hourly ma d maintain thes	ent stre iss emis e recor	eam flow and composion rates for the ds for at least five	tion and data for the position for the flare flares to demonstra years. The Date Re imated date of comp	flow monitors te compliance equired is the
Avoided Costs	ANNUA	LIZE avoided c	osts before en	tering	item (except for	r one-time avoide	d costs)
Disposal				0.00	\$0	\$0	\$0
Personnel				0.00	\$0	\$0	\$0
Inspection/Reporting/Sampling				0.00	\$0 \$0	\$0	\$0 \$0
Supplies/Equipment Financial Assurance				0.00	\$0	\$0 \$0	\$0
ONE-TIME avoided costs				0.00	\$0	\$0	\$0
Other (as needed)				0.00	\$0	\$0	\$0
Notes for AVOIDED costs							
Approx. Cost of Compliance		\$1,500			TOTAL		\$367



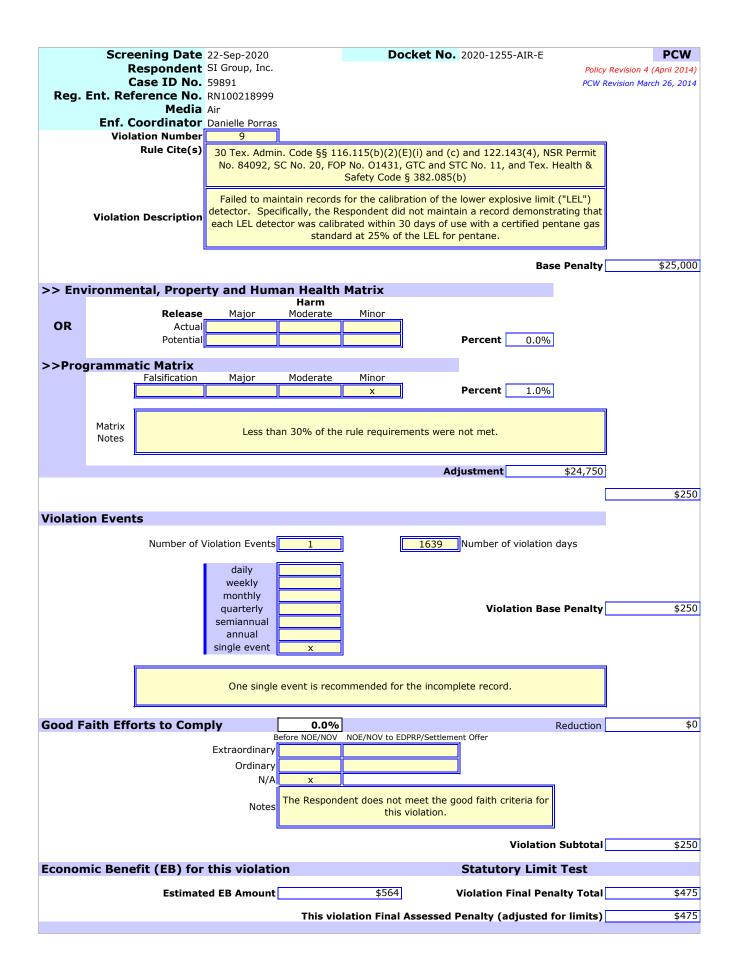
	E	conomic	Benefit	Wo	rksheet		
Respondent							
Case ID No.							
Reg. Ent. Reference No. Media	Air					Percent Interest	Years of
Violation No.	6						Depreciation
						5.0	15
		Date Required	Final Date	Yrs	Interest Saved	Costs Saved	EB Amount
Item Description							
Delayed Costs		1		ə			
Equipment				0.00	\$0	\$0	\$0
Buildings				0.00	\$0	\$0	\$0
Other (as needed)				0.00	\$0	\$0	\$0
Engineering/Construction				0.00	\$0	\$0	\$0
Land	+1 500	26 5 2010	1 0 1 0000	0.00	\$0	n/a	\$0
Record Keeping System	\$1,500	26-Dec-2018	1-Oct-2023	4.77	\$358	n/a	\$358
Training/Sampling			-	0.00	\$0	n/a	\$0
Remediation/Disposal				0.00	\$0	n/a	\$0
Permit Costs Other (as needed)				0.00	\$0 \$0	n/a n/a	\$0 \$0
		2	5 1	5	,	s records for all truc	, ,
Notes for DELAYED costs	railcar, drum Permit No. 23	ming, and tote loa 41 and maintain t	ding operations hese records fo	s that in r at leas	cludes the data ar st five years. The	s records for all truc nd information as de Date Required is th d date of compliance	scribed in NSR e effective date
	railcar, drumr Permit No. 23	ming, and tote loa 41 and maintain t of the special con	ading operations these records for adition and the	s that in r at leas Final Da	cludes the data ar st five years. The te is the estimated	nd information as de Date Required is th I date of compliance	scribed in NSR e effective date
Notes for DELAYED costs Avoided Costs Disposal	railcar, drumr Permit No. 23	ming, and tote loa 41 and maintain t of the special con	ading operations these records for adition and the	s that in r at leas Final Da	cludes the data ar st five years. The te is the estimated	nd information as de Date Required is the	scribed in NSR e effective date
Avoided Costs	railcar, drumr Permit No. 23	ming, and tote loa 41 and maintain t of the special con	ading operations these records for adition and the	that in at leas inal Da	cludes the data ar st five years. The te is the estimated item (except for	nd information as de Date Required is th I date of compliance	scribed in NSR e effective date d costs)
Avoided Costs Disposal Personnel	railcar, drumr Permit No. 23	ming, and tote loa 41 and maintain t of the special con	ading operations these records for adition and the	that in r at leas Final Da	cludes the data ar st five years. The te is the estimated item (except for \$0	nd information as de Date Required is th d date of compliance r one-time avoide \$0	scribed in NSR e effective date  d costs) \$0
Avoided Costs Disposal Personnel	railcar, drumr Permit No. 23	ming, and tote loa 41 and maintain t of the special con	ading operations these records for adition and the	that in r at leas inal Da tering 0.00	cludes the data ar st five years. The te is the estimated item (except for \$0 \$0	d information as de Date Required is th date of compliance r <b>one-time avoide</b> \$0 \$0	scribed in NSR e effective date d costs) \$0 \$0
Avoided Costs Disposal Personnel Inspection/Reporting/Sampling	railcar, drumr Permit No. 23	ming, and tote loa 41 and maintain t of the special con	ading operations these records for adition and the	that in r at lease inal Da tering 0.00 0.00 0.00	cludes the data ar st five years. The te is the estimated item (except for \$0 \$0 \$0	d information as de Date Required is the date of compliance r one-time avoider \$0 \$0 \$0 \$0 \$0 \$0 \$0	scribed in NSR e effective date d costs) \$0 \$0 \$0
Avoided Costs Disposal Personnel Inspection/Reporting/Sampling Supplies/Equipment	railcar, drumr Permit No. 23	ming, and tote loa 41 and maintain t of the special con	ading operations these records for adition and the	that in r at lease inal Da 0.00 0.00 0.00 0.00 0.00 0.00	cludes the data ar st five years. The te is the estimated <b>item (except for</b> \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	d information as de Date Required is the date of compliance r one-time avoided \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	scribed in NSR e effective date  d costs) \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0
Avoided Costs Disposal Personnel Inspection/Reporting/Sampling Supplies/Equipment Financial Assurance	railcar, drumr Permit No. 23	ming, and tote loa 41 and maintain t of the special con	ading operations these records for adition and the	tering 0.00 0.00 0.00 0.00 0.00 0.00 0.00	cludes the data ar st five years. The te is the estimated item (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	d information as de Date Required is the date of compliance r one-time avoider \$0 \$0 \$0 \$0 \$0 \$0 \$0	scribed in NSR e effective date  d costs) \$0 \$0 \$0 \$0 \$0 \$0 \$0
Avoided Costs Disposal Personnel Inspection/Reporting/Sampling Supplies/Equipment Financial Assurance ONE-TIME avoided costs	railcar, drumr Permit No. 23	ming, and tote loa 41 and maintain t of the special con	ading operations these records for adition and the	that in r at lease inal Da 0.00 0.00 0.00 0.00 0.00 0.00	cludes the data ar st five years. The te is the estimated <b>item (except for</b> \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	d information as de Date Required is the date of compliance r one-time avoided \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	scribed in NSR e effective date d costs) \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0



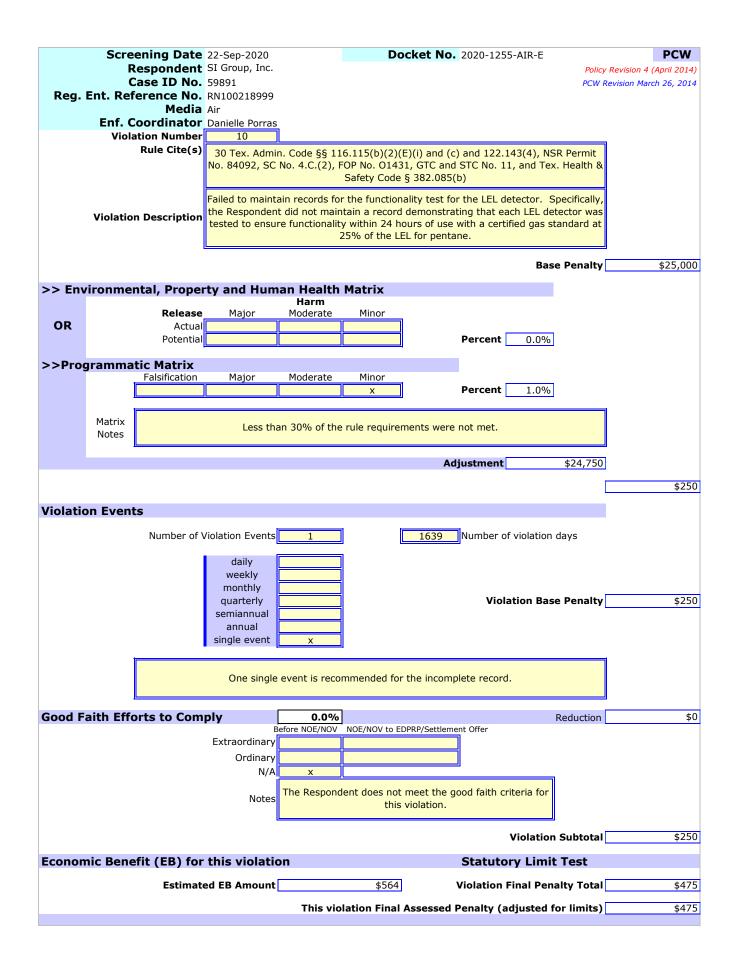
	E	conomic	Benefit	Wo	rksheet		
Respondent	SI Group, Inc.						
Case ID No.	59891						
Reg. Ent. Reference No.	RN100218999						
Media						Percent Interest	Years of
Violation No.	/						Depreciation
						5.0	1
		Date Required	Final Date	Yrs	Interest Saved	Costs Saved	EB Amount
Item Description							
Delayed Costs				_			
Equipment				0.00	\$0	\$0	\$0
Buildings				0.00	\$0	\$0	\$0
Other (as needed)				0.00	\$0	\$0	\$0
Engineering/Construction				0.00	\$0	\$0	\$0
Land				0.00	\$0	n/a	\$0
Record Keeping System	\$1,500	26-Dec-2018	1-Oct-2023	4.77	\$358	n/a	\$358
Training/Sampling				0.00	\$0	n/a	\$0
Remediation/Disposal				0.00	\$0	n/a	\$0
Permit Costs				0.00	\$0	n/a	\$0
Other (as needed)				0.00 ds of the	\$0 e fresh water flow	n/a n/a rate to the educator	\$0 r for the Water
Other (as needed) Notes for DELAYED costs	Scrubber F-75	50 when each raile	car is connected le effective date	0.00 ds of the to be o e of the	\$0 e fresh water flow controlled and main	n/a	\$0 r for the Water for at least five
	Scrubber F-75 years. The D	50 when each raild ate Required is th	car is connected le effective date da	0.00 ds of the d to be c e of the te of cor	\$0 e fresh water flow controlled and main special condition a mpliance.	n/a rate to the educator ntain these records	\$0 r for the Water for at least five the estimated
Notes for DELAYED costs	Scrubber F-75 years. The D	50 when each raild ate Required is th	car is connected le effective date da	0.00 ds of the d to be c e of the te of cor	\$0 e fresh water flow controlled and main special condition a mpliance.	n/a rate to the educatoi ntain these records ind the Final Date is	\$0 r for the Water for at least five the estimated
Notes for DELAYED costs Avoided Costs	Scrubber F-75 years. The D	50 when each raild ate Required is th	car is connected le effective date da	0.00 ds of the d to be of e of the te of con tering 0.00	\$0 e fresh water flow controlled and main special condition a mpliance. item (except for \$0 \$0	n/a rate to the educator ntain these records and the Final Date is <b>one-time avoide</b> \$0 \$0	\$0 r for the Water for at least five the estimated d costs) \$0 \$0
Notes for DELAYED costs Avoided Costs Disposal	Scrubber F-75 years. The D	50 when each raild ate Required is th	car is connected le effective date da	0.00 ds of the d to be of e of the te of con tering 0.00 0.00	\$0 e fresh water flow controlled and main special condition a mpliance. item (except for \$0 \$0 \$0	n/a rate to the educator ntain these records and the Final Date is <b>one-time avoide</b> \$0 \$0 \$0	\$0 r for the Water for at least five the estimated d costs) \$0 \$0 \$0
Notes for DELAYED costs Avoided Costs Disposal Personnel	Scrubber F-75 years. The D	50 when each raild ate Required is th	car is connected le effective date da	0.00 ds of the d to be c e of the te of con tering 0.00 0.00 0.00 0.00	\$0 e fresh water flow controlled and main special condition a mpliance. item (except for \$0 \$0 \$0 \$0 \$0	n/a rate to the educator ntain these records and the Final Date is r one-time avoider \$0 \$0 \$0 \$0 \$0	\$0 r for the Water for at least five the estimated d costs) \$0 \$0 \$0 \$0 \$0
Notes for DELAYED costs <b>Avoided Costs</b> Disposal Personnel Inspection/Reporting/Sampling	Scrubber F-75 years. The D	50 when each raild ate Required is th	car is connected le effective date da	0.00           ds of the           d to be of           e of the           te of con           0.00           0.00           0.00           0.00           0.00           0.00           0.00           0.00	\$0 e fresh water flow controlled and main special condition a mpliance. item (except for \$0 \$0 \$0 \$0 \$0 \$0	n/a rate to the educator ntain these records and the Final Date is rone-time avoider \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	\$0 r for the Water for at least five the estimated d costs) \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0
Notes for DELAYED costs <b>Avoided Costs</b> Disposal Personnel Inspection/Reporting/Sampling Supplies/Equipment Financial Assurance ONE-TIME avoided costs	Scrubber F-75 years. The D	50 when each raild ate Required is th	car is connected le effective date da	0.00           ds of the           d to be of           e of the           tering           0.00           0.00           0.00           0.00           0.00           0.00           0.00           0.00           0.00           0.00           0.00           0.00	\$0 e fresh water flow controlled and main special condition a mpliance. item (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	n/a rate to the educator ntain these records and the Final Date is rone-time avoided \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	\$0 r for the Water for at least five the estimated d costs) \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0
Notes for DELAYED costs Avoided Costs Disposal Personnel Inspection/Reporting/Sampling Supplies/Equipment Financial Assurance	Scrubber F-75 years. The D	50 when each raild ate Required is th	car is connected le effective date da	0.00           ds of the           d to be of           e of the           te of con           0.00           0.00           0.00           0.00           0.00           0.00           0.00           0.00	\$0 e fresh water flow controlled and main special condition a mpliance. item (except for \$0 \$0 \$0 \$0 \$0 \$0	n/a rate to the educator ntain these records and the Final Date is rone-time avoider \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	\$0 r for the Water for at least five the estimated d costs) \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0
Notes for DELAYED costs <b>Avoided Costs</b> Disposal Personnel Inspection/Reporting/Sampling Supplies/Equipment Financial Assurance ONE-TIME avoided costs	Scrubber F-75 years. The D	50 when each raild ate Required is th	car is connected le effective date da	0.00           ds of the           d to be of           e of the           tering           0.00           0.00           0.00           0.00           0.00           0.00           0.00           0.00           0.00           0.00           0.00           0.00	\$0 e fresh water flow controlled and main special condition a mpliance. item (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	n/a rate to the educator ntain these records and the Final Date is rone-time avoided \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	\$0 r for the Water for at least five the estimated d costs) \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0



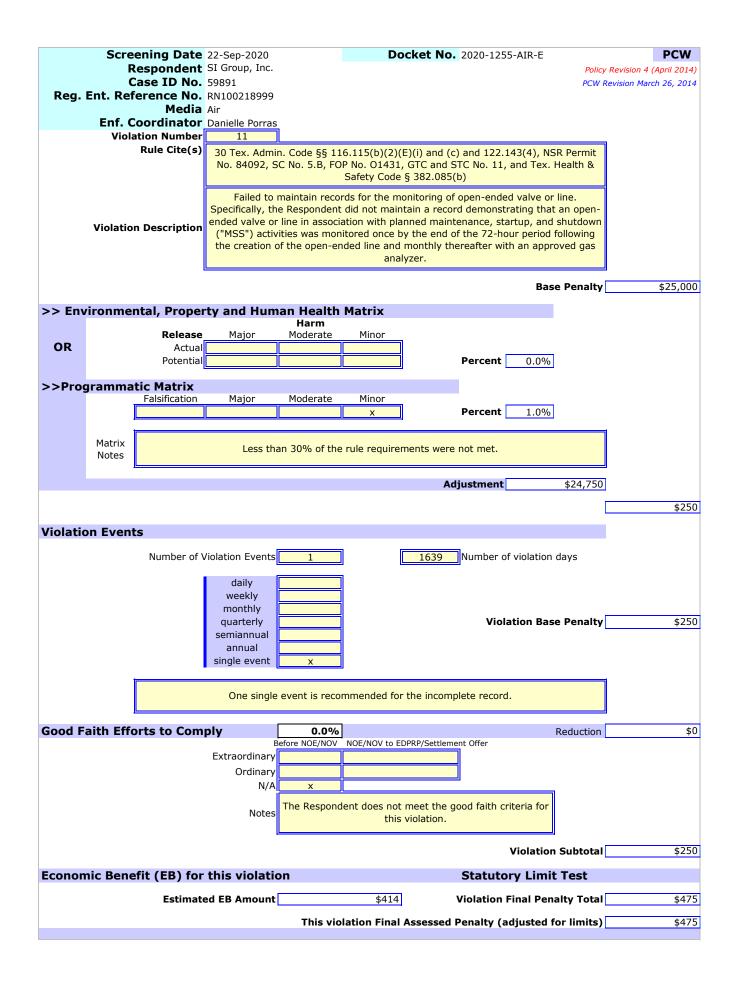
	E	conomic	Benefit	Wo	rksheet		
Respondent							
Case ID No.							
leg. Ent. Reference No.	RN100218999						
Media Violation No.	Air					Percent Interest	Years of Depreciation
						5.0	15
	Item Cost	Date Required	Final Date	Yrs	Interest Saved	Costs Saved	EB Amount
Item Description							
Delayed Costs							
Equipment				0.00	\$0	\$0	\$0
Buildings				0.00	\$0	\$0	\$0
Other (as needed)				0.00	\$0	\$0	\$0
Engineering/Construction				0.00	\$0	\$0	\$0
Land				0.00	\$0	n/a	\$0
Record Keeping System	\$1,500	26-Dec-2018	1-Oct-2023	4.77	\$358	n/a	\$358
Training/Sampling				0.00	\$0	n/a	\$0
Remediation/Disposal				0.00	\$0	n/a	\$0
Permit Costs				0.00	\$0	n/a	\$0
Other (as needed)				0.00 ords of t	\$0 the hours of opera	n/a n/a tion and monthly ar ese records for at le	
	month emissi	ons for each vacu	um pump and	0.00 ords of t steam je	\$0 the hours of opera et and maintain th condition and the	n/a tion and monthly ar	\$0 nd rolling 12- east five years.
Other (as needed) Notes for DELAYED costs	month emissi The Date Req	ons for each vacu uired is the effect	um pump and ive date of the	0.00 ords of t steam je special compli	\$0 the hours of opera et and maintain th condition and the ance.	n/a tion and monthly ar ese records for at le Final Date is the est	\$0 nd rolling 12- east five years. imated date of
Other (as needed) Notes for DELAYED costs Avoided Costs	month emissi The Date Req	ons for each vacu uired is the effect	um pump and ive date of the	0.00 ords of t steam je special compli	\$0 the hours of opera et and maintain th condition and the ance. item (except for	n/a tion and monthly ar ese records for at le Final Date is the est one-time avoide	\$0 nd rolling 12- east five years. imated date of d costs)
Other (as needed) Notes for DELAYED costs	month emissi The Date Req	ons for each vacu uired is the effect	um pump and ive date of the	0.00 ords of t steam je special compli tering 0.00	\$0 the hours of opera et and maintain th condition and the ance. item (except for \$0	n/a tion and monthly ar ese records for at le Final Date is the est one-time avoide \$0	\$0 ad rolling 12- cast five years. imated date of d costs) \$0
Other (as needed) Notes for DELAYED costs <b>Avoided Costs</b> Disposal Personnel	month emissi The Date Req	ons for each vacu uired is the effect	um pump and ive date of the	0.00 ords of t steam je special compli	\$0 the hours of opera et and maintain th condition and the ance. item (except for \$0 \$0	n/a tion and monthly ar ese records for at le Final Date is the est one-time avoide \$0 \$0	\$0 ad rolling 12- cast five years. imated date of d costs) \$0 \$0
Other (as needed) Notes for DELAYED costs <b>Avoided Costs</b> Disposal Personnel nspection/Reporting/Sampling	month emissi The Date Req	ons for each vacu uired is the effect	um pump and ive date of the	0.00 ords of t steam je special compli- tering 0.00 0.00	\$0 the hours of opera et and maintain th condition and the ance. item (except for \$0 \$0 \$0	n/a tion and monthly ar ese records for at le Final Date is the est <b>r one-time avoide</b> \$0 \$0 \$0	\$0 ad rolling 12- ast five years. imated date of d costs) \$0 \$0 \$0
Other (as needed) Notes for DELAYED costs <b>Avoided Costs</b> Disposal Personnel	month emissi The Date Req	ons for each vacu uired is the effect	um pump and ive date of the	0.00 ords of t steam je special compli- tering 0.00 0.00 0.00	\$0 the hours of opera et and maintain th condition and the ance. item (except for \$0 \$0 \$0 \$0 \$0	n/a tion and monthly ar ese records for at le Final Date is the est one-time avoide \$0 \$0 \$0 \$0 \$0	\$0 ad rolling 12- bast five years. imated date of d costs) \$0 \$0 \$0 \$0 \$0
Other (as needed) Notes for DELAYED costs <b>Avoided Costs</b> Disposal Personnel nspection/Reporting/Sampling Supplies/Equipment	month emissi The Date Req	ons for each vacu uired is the effect	um pump and ive date of the	0.00 ords of t steam je special compli- tering 0.00 0.00 0.00 0.00	\$0 the hours of opera et and maintain th condition and the ance. item (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0	n/a tion and monthly ar ese records for at le Final Date is the est r one-time avoider \$0 \$0 \$0 \$0 \$0 \$0 \$0	\$0 at rolling 12- bast five years. imated date of d costs) \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0
Other (as needed) Notes for DELAYED costs <b>Avoided Costs</b> Disposal Personnel nspection/Reporting/Sampling Supplies/Equipment Financial Assurance	month emissi The Date Req	ons for each vacu uired is the effect	um pump and ive date of the	0.00 ords of t steam je special compli- tering 0.00 0.00 0.00	\$0 the hours of opera et and maintain th condition and the ance. item (except for \$0 \$0 \$0 \$0 \$0	n/a tion and monthly ar ese records for at le Final Date is the est one-time avoide \$0 \$0 \$0 \$0 \$0	\$0 ad rolling 12- bast five years. imated date of d costs) \$0 \$0 \$0 \$0 \$0
Other (as needed) Notes for DELAYED costs <b>Avoided Costs</b> Disposal Personnel nspection/Reporting/Sampling Supplies/Equipment Financial Assurance ONE-TIME avoided costs	month emissi The Date Req	ons for each vacu uired is the effect	um pump and ive date of the	0.00 ords of t steam jo special complia 0.00 0.00 0.00 0.00 0.00	\$0 the hours of opera et and maintain th condition and the ance. item (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	n/a tion and monthly ar ese records for at le Final Date is the est <b>r one-time avoide</b> \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	\$0 ad rolling 12- cast five years. imated date of d costs) \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0
Other (as needed) Notes for DELAYED costs <b>Avoided Costs</b> Disposal Personnel nspection/Reporting/Sampling Supplies/Equipment Financial Assurance ONE-TIME avoided costs	month emissi The Date Req	ons for each vacu uired is the effect	um pump and ive date of the	0.00 ords of t steam jo special complia 0.00 0.00 0.00 0.00 0.00	\$0 the hours of opera et and maintain th condition and the ance. item (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	n/a tion and monthly ar ese records for at le Final Date is the est <b>r one-time avoide</b> \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	\$0 ad rolling 12- bast five years. imated date of d costs) \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0



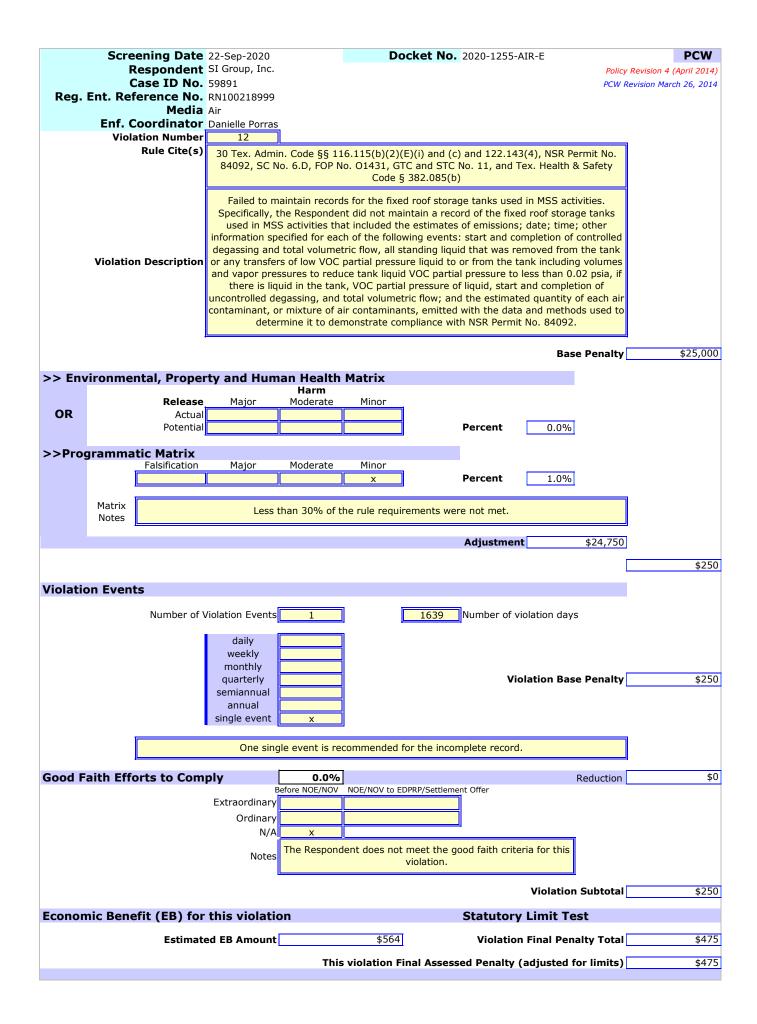
	E	conomic	Benefit	Wo	rksheet		
Respondent	SI Group, Inc.						
Case ID No.	59891						
leg. Ent. Reference No.							
Media						Percent Interest	Years of
Violation No.	9					r creent interest	Depreciation
						5.0	1
	Item Cost	<b>Date Required</b>	Final Date	Yrs	Interest Saved	Costs Saved	EB Amount
Item Description							
Delayed Costs				_			
Equipment				0.00	\$0	\$0	\$0
Buildings				0.00	\$0	\$0	\$0
Other (as needed)				0.00	\$0	\$0	\$0
Engineering/Construction				0.00	\$0	\$0	\$0
Land				0.00	\$0	n/a	\$0
Record Keeping System	\$1,500	28-Mar-2016	1-Oct-2023	7.52	\$564	n/a	\$564
Training/Sampling				0.00	\$0	n/a	\$0
Remediation/Disposal				0.00	\$0	n/a	\$0
Permit Costs				0.00	\$0	n/a	\$0
Other (as needed)						n/a n/a EL detector is calibra for pentane and ma	
	days of us	e with a certified	pentane gas sta The Date Requ	0.00 lemonst andard a ired is t	\$0 rating that each L at 25% of the LEL	n/a	\$0 ated within 30 intain these
Other (as needed)	days of us records for at	e with a certified least five years.	pentane gas sta The Date Requ the estima	0.00 lemonst andard a ired is t ated dat	\$0 rrating that each L at 25% of the LEL he first date of no e of compliance.	n/a EL detector is calibra for pentane and ma	\$0 ated within 30 intain these he Final Date is
Other (as needed) Notes for DELAYED costs	days of us records for at	e with a certified least five years.	pentane gas sta The Date Requ the estima	0.00 lemonst andard a ired is t ated dat	\$0 rrating that each L at 25% of the LEL he first date of no e of compliance.	n/a EL detector is calibra for pentane and ma n-compliance and th	\$0 ated within 30 intain these he Final Date is
Other (as needed) Notes for DELAYED costs Avoided Costs	days of us records for at	e with a certified least five years.	pentane gas sta The Date Requ the estima	0.00 lemonst andard a ired is t ated dat	\$0 rrating that each L at 25% of the LEL he first date of no e of compliance. item (except for	n/a EL detector is calibra for pentane and ma n-compliance and th one-time avoide	\$0 ated within 30 intain these he Final Date is d costs)
Other (as needed) Notes for DELAYED costs Avoided Costs Disposal Personnel	days of us records for at	e with a certified least five years.	pentane gas sta The Date Requ the estima	0.00 lemonst ired is t ated dat tering 0.00	\$0 rating that each L at 25% of the LEL he first date of no e of compliance. item (except for \$0	n/a EL detector is calibra for pentane and ma n-compliance and th <b>one-time avoide</b> \$0	\$0 ated within 30 intain these he Final Date is d costs) \$0
Other (as needed) Notes for DELAYED costs Avoided Costs Disposal Personnel	days of us records for at	e with a certified least five years.	pentane gas sta The Date Requ the estima	0.00 lemonst ired is t ated dat tering 0.00	\$0 trating that each L at 25% of the LEL he first date of no e of compliance. item (except for \$0 \$0	n/a EL detector is calibri for pentane and ma n-compliance and th r one-time avoider \$0 \$0	\$0 ated within 30 intain these he Final Date is d costs) \$0 \$0
Other (as needed) Notes for DELAYED costs <b>Avoided Costs</b> Disposal Personnel nspection/Reporting/Sampling	days of us records for at	e with a certified least five years.	pentane gas sta The Date Requ the estima	0.00 lemonst ired is t ited dat tering 0.00 0.00	\$0 rating that each L at 25% of the LEL he first date of no e of compliance. item (except for \$0 \$0 \$0	n/a EL detector is calibri for pentane and ma n-compliance and th <b>one-time avoide</b> \$0 \$0 \$0	\$0 ated within 30 intain these le Final Date is d costs) \$0 \$0 \$0
Other (as needed) Notes for DELAYED costs <b>Avoided Costs</b> Disposal Personnel Inspection/Reporting/Sampling Supplies/Equipment	days of us records for at	e with a certified least five years.	pentane gas sta The Date Requ the estima	0.00 lemonst ired is t ated dat 0.00 0.00 0.00 0.00	\$0 rating that each L at 25% of the LEL he first date of no e of compliance. item (except for \$0 \$0 \$0 \$0	n/a EL detector is calibro for pentane and ma n-compliance and th r one-time avoided \$0 \$0 \$0 \$0 \$0	\$0 ated within 30 intain these be Final Date is the final Date is the final Date be so the final Date so the final Date
Other (as needed) Notes for DELAYED costs <b>Avoided Costs</b> Disposal Personnel nspection/Reporting/Sampling Supplies/Equipment Financial Assurance	days of us records for at	e with a certified least five years.	pentane gas sta The Date Requ the estima	0.00 lemonst indard a ired is t ated dat 0.00 0.00 0.00 0.00 0.00	\$0 rating that each L at 25% of the LEL he first date of no e of compliance. item (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	n/a EL detector is calibra for pentane and ma n-compliance and th r one-time avoided \$0 \$0 \$0 \$0 \$0 \$0 \$0	\$0 ated within 30 intain these he Final Date is d costs) \$0 \$0 \$0 \$0 \$0 \$0
Other (as needed) Notes for DELAYED costs Disposal Personnel nspection/Reporting/Sampling Supplies/Equipment Financial Assurance ONE-TIME avoided costs	days of us records for at	e with a certified least five years.	pentane gas sta The Date Requ the estima	0.00 lemonst ired is t ited dat 0.00 0.00 0.00 0.00 0.00	\$0 rating that each L at 25% of the LEL he first date of no e of compliance. item (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	n/a EL detector is calibra for pentane and ma n-compliance and th on-time avoided \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	\$0 ated within 30 intain these he Final Date is be final
Other (as needed) Notes for DELAYED costs Disposal Personnel inspection/Reporting/Sampling Supplies/Equipment Financial Assurance ONE-TIME avoided costs	days of us records for at	e with a certified least five years.	pentane gas sta The Date Requ the estima	0.00 lemonst ired is t ited dat 0.00 0.00 0.00 0.00 0.00	\$0 rating that each L at 25% of the LEL he first date of no e of compliance. item (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	n/a EL detector is calibra for pentane and ma n-compliance and th on-time avoided \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	\$0 ated within 30 intain these he Final Date is f costs) \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0
Other (as needed) Notes for DELAYED costs <b>Avoided Costs</b> Disposal Personnel Inspection/Reporting/Sampling Supplies/Equipment Financial Assurance ONE-TIME avoided costs Other (as needed)	days of us records for at	e with a certified least five years.	pentane gas sta The Date Requ the estima	0.00 lemonst ired is t ited dat 0.00 0.00 0.00 0.00 0.00	\$0 rating that each L at 25% of the LEL he first date of no e of compliance. item (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	n/a EL detector is calibra for pentane and ma n-compliance and th on-time avoided \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	\$0 ated within 30 intain these he Final Date is f costs) \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0



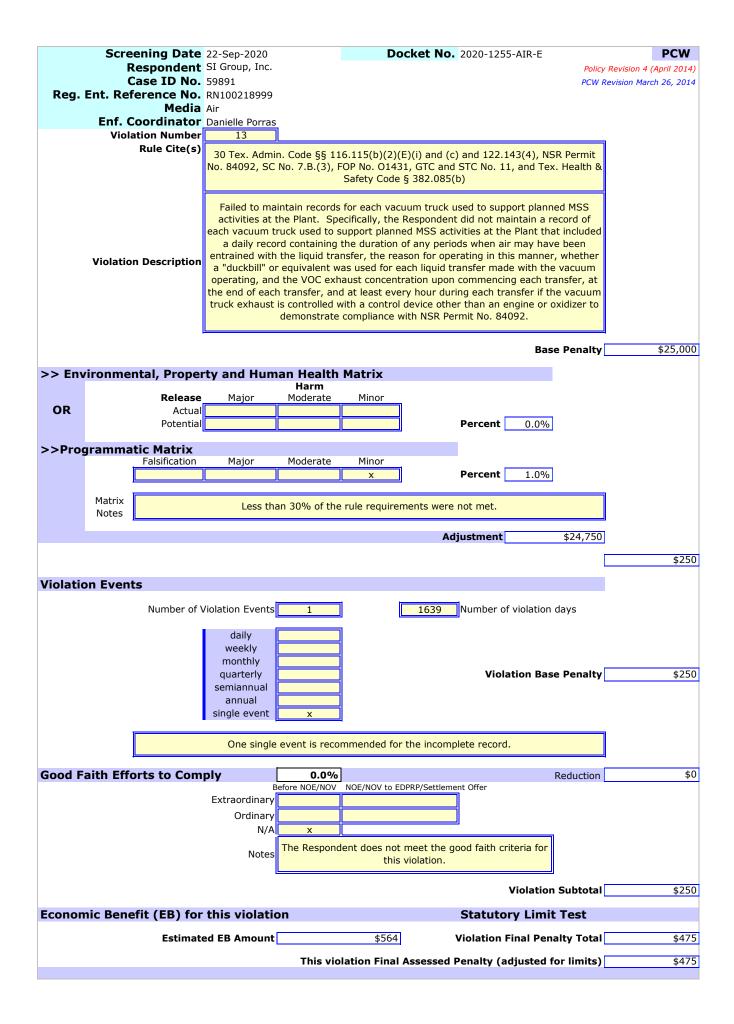
	E	conomic	Benefit	Wo	rksheet		
Respondent Case ID No. Reg. Ent. Reference No.	59891						
Media Violation No.	Air					Percent Interest	Years of Depreciation
						5.0	15
	Item Cost	<b>Date Required</b>	Final Date	Yrs	Interest Saved	Costs Saved	EB Amount
Item Description							
Delayed Costs	·	<u></u>	·		10	1.0	1.0
Equipment				0.00	\$0	\$0	\$0
Buildings				0.00	\$0	\$0	\$0
Other (as needed)				0.00	\$0 \$0	\$0 \$0	\$0 \$0
Engineering/Construction Land				0.00	\$0 \$0	\$0 n/a	\$0 \$0
Record Keeping System	\$1,500	28-Mar-2016	1-Oct-2023	7.52	\$564	n/a	\$564
Training/Sampling	\$1,500	20-141-2010	1-001-2023	0.00	\$0	n/a	\$0
Remediation/Disposal				0.00	\$0	n/a	\$0
Permit Costs				0.00	\$0	n/a	\$0
Other (as needed)				0.00	\$0	n/a	\$0
	Lounded	lost to begin mai	italiling records	demon	strating that each	LEL detector is test	ed to ensure
Notes for DELAYED costs	functionali	ty within 24 hour se records for at	s of use with a least five years.	certified The Da	l gas standard at 2	25% of the LEL for p e first date of non-co	entane and
Notes for DELAYED costs	functionali maintain the	ty within 24 hour se records for at the	s of use with a least five years. Final Date is th	certified The Da le estim	l gas standard at 2 ate Required is the lated date of comp	25% of the LEL for p e first date of non-co	entane and ompliance and
	functionali maintain the	ty within 24 hour se records for at the	s of use with a least five years. Final Date is th	certified The Da le estim	l gas standard at 2 ate Required is the lated date of comp	25% of the LEL for p e first date of non-co lliance.	entane and ompliance and
Avoided Costs	functionali maintain the	ty within 24 hour se records for at the	s of use with a least five years. Final Date is th	tertified The Date e estim	ate Required is the lated date of comp item (except for \$0 \$0	25% of the LEL for p e first date of non-co pliance. r one-time avoider \$0 \$0	entane and ompliance and d costs) \$0 \$0
Avoided Costs Disposal Personnel Inspection/Reporting/Sampling	functionali maintain the	ty within 24 hour se records for at the	s of use with a least five years. Final Date is th	terified The Date estim tering 0.00 0.00 0.00	ate Required is the ated date of comp item (except for \$0 \$0 \$0 \$0 \$0	25% of the LEL for p e first date of non-co pliance. r one-time avoided \$0 \$0 \$0	entane and ompliance and d costs) \$0 \$0 \$0 \$0
Avoided Costs Disposal Personnel Inspection/Reporting/Sampling Supplies/Equipment	functionali maintain the	ty within 24 hour se records for at the	s of use with a least five years. Final Date is th	certified The Date estime tering 0.00 0.00 0.00 0.00	ate Required is the ated date of compared date of compared date of compared date of so	25% of the LEL for p e first date of non-co pliance. r one-time avoider \$0 \$0 \$0 \$0 \$0	entane and ompliance and d costs) \$0 \$0 \$0 \$0 \$0 \$0
Avoided Costs Disposal Personnel Inspection/Reporting/Sampling Supplies/Equipment Financial Assurance	functionali maintain the	ty within 24 hour se records for at the	s of use with a least five years. Final Date is th	terified The Date estime tering 0.00 0.00 0.00 0.00 0.00	ate Required is the ated date of comp item (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	25% of the LEL for p e first date of non-co pliance. r one-time avoide \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	entane and ompliance and d costs) \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0
Avoided Costs Disposal Personnel Inspection/Reporting/Sampling Supplies/Equipment Financial Assurance ONE-TIME avoided costs	functionali maintain the	ty within 24 hour se records for at the	s of use with a least five years. Final Date is th	terified The Date estime <b>tering</b> 0.00 0.00 0.00 0.00 0.00 0.00	ate Required is the ated date of comp item (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	25% of the LEL for p e first date of non-co pliance. r one-time avoider \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	entane and ompliance and \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0
Avoided Costs Disposal Personnel Inspection/Reporting/Sampling Supplies/Equipment Financial Assurance	functionali maintain the	ty within 24 hour se records for at the	s of use with a least five years. Final Date is th	terified The Date estime tering 0.00 0.00 0.00 0.00 0.00	ate Required is the ated date of comp item (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	25% of the LEL for p e first date of non-co pliance. r one-time avoide \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	entane and ompliance and d costs) \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0
Avoided Costs Disposal Personnel Inspection/Reporting/Sampling Supplies/Equipment Financial Assurance ONE-TIME avoided costs	functionali maintain the	ty within 24 hour se records for at the	s of use with a least five years. Final Date is th	terified The Date estime <b>tering</b> 0.00 0.00 0.00 0.00 0.00 0.00	ate Required is the ated date of comp item (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	25% of the LEL for p e first date of non-co pliance. r one-time avoider \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	entane and ompliance and d costs) \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0



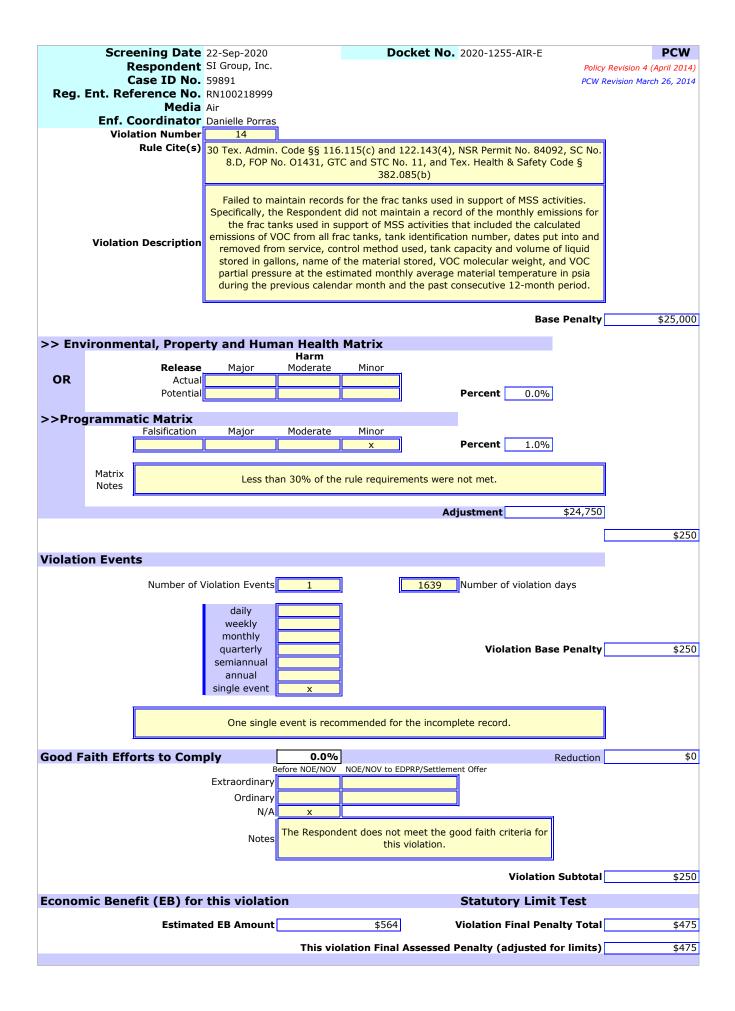
	E	CONOMIC	Deneni	WO	rksheet		
Respondent	SI Group, Inc.						
Case ID No.	59891						
Reg. Ent. Reference No.	RN100218999						
Media							Years of
Violation No.						Percent Interest	Depreciation
violation No.	11						Depreciation
						5.0	15
	Item Cost	Date Required	Final Date	Yrs	Interest Saved	Costs Saved	EB Amount
Item Description							
Delayed Costs							
Equipment				0.00	\$0	\$0	\$0
Buildings				0.00	\$0	\$0	\$0
Other (as needed)				0.00	\$0	\$0 \$0	\$0 \$0
Engineering/Construction				0.00	\$0	\$0	\$0
Land				0.00	\$0	n/a	\$0
Record Keeping System	\$1,500	26-Mar-2018	1-Oct-2023	5.52	\$414	n/a	\$414
				0.00	\$0	n/a	\$0
I I allillig / Sallibillig				0.00	\$0	n/a	\$0
Training/Sampling Remediation/Disposal							
Remediation/Disposal Permit Costs	<u> </u>			0.00		n/a	\$0
Remediation/Disposal	with planned N	MSS activities is m	onitored once b	0.00 0.00 emonstr	\$0 \$0 rating that an oper end of the 72-hour	n/a n/a n-ended valve or line period following the	creation of the
Remediation/Disposal Permit Costs	with planned N open-ended I	MSS activities is m line and monthly t	onitored once t hereafter with a uired is the first	0.00 0.00 emonstr by the e an appr c date o	\$0 \$0 rating that an oper and of the 72-hour oved gas analyzer	n/a n-ended valve or line	\$0 e in association e creation of the records for at
Remediation/Disposal Permit Costs Other (as needed) Notes for DELAYED costs	with planned N open-ended I least five year	MSS activities is m line and monthly t rs. The Date Req	onitored once the hereafter with a uired is the first dat	0.00 0.00 emonstr by the e an appr date o ce of con	\$0 \$0 rating that an oper and of the 72-hour oved gas analyzer f non-compliance a mpliance.	n/a n-ended valve or line period following the and maintain these and the Final Date is	\$0 e in association e creation of the records for at the estimated
Remediation/Disposal Permit Costs Other (as needed) Notes for DELAYED costs Avoided Costs	with planned N open-ended I least five year	MSS activities is m line and monthly t rs. The Date Req	onitored once the hereafter with a uired is the first dat	0.00 0.00 emonstr by the e an appr date o ce of con	\$0 \$0 rating that an oper and of the 72-hour oved gas analyzer f non-compliance a mpliance. item (except for	n/a n-ended valve or line period following the and maintain these and the Final Date is none-time avoide	\$0 e in association e creation of the records for at s the estimated d costs)
Remediation/Disposal Permit Costs Other (as needed) Notes for DELAYED costs	with planned N open-ended I least five year	MSS activities is m line and monthly t rs. The Date Req	onitored once the hereafter with a uired is the first dat	0.00 0.00 emonstr by the e an appr date o ce of co <b>tering</b> 0.00	\$0 \$0 rating that an oper and of the 72-hour roved gas analyzer f non-compliance a mpliance. item (except for \$0	n/a n-ended valve or line period following the and maintain these and the Final Date is <b>one-time avoide</b> \$0	\$0 e in association c creation of the records for at s the estimated d costs) \$0
Remediation/Disposal Permit Costs Other (as needed) Notes for DELAYED costs Avoided Costs Disposal Personnel	with planned N open-ended I least five year	MSS activities is m line and monthly t rs. The Date Req	onitored once the hereafter with a uired is the first dat	0.00 0.00 emonstr by the e an appr date o ce of con	\$0 \$0 ating that an oper and of the 72-hour oved gas analyzer f non-compliance a mpliance. item (except for \$0 \$0	n/a period following the and maintain these and the Final Date is <b>one-time avoide</b> \$0	\$0 e in association e creation of the records for at e the estimated d costs) \$0 \$0
Remediation/Disposal Permit Costs Other (as needed) Notes for DELAYED costs Avoided Costs Disposal Personnel	with planned N open-ended I least five year	MSS activities is m line and monthly t rs. The Date Req	onitored once the hereafter with a uired is the first dat	0.00 0.00 emonstr by the e an appr date o ce of co tering 0.00	\$0 \$0 rating that an oper and of the 72-hour roved gas analyzer f non-compliance a mpliance. item (except for \$0	n/a n-ended valve or line period following the and maintain these and the Final Date is <b>one-time avoide</b> \$0	\$0 e in association c creation of the records for at s the estimated d costs) \$0
Remediation/Disposal Permit Costs Other (as needed) Notes for DELAYED costs <b>Avoided Costs</b> Disposal Personnel Inspection/Reporting/Sampling	with planned N open-ended I least five year	MSS activities is m line and monthly t rs. The Date Req	onitored once the hereafter with a uired is the first dat	0.00 0.00 emonstr by the e an appr date o ce of con tering 0.00 0.00 0.00	\$0 \$0 rating that an oper end of the 72-hour oved gas analyzer f non-compliance a mpliance. item (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0	n/a period following the and maintain these and the Final Date is r one-time avoider \$0 \$0 \$0 \$0	\$0 e in association e creation of the records for at s the estimated d costs) \$0 \$0 \$0 \$0 \$0
Remediation/Disposal Permit Costs Other (as needed) Notes for DELAYED costs <b>Avoided Costs</b> Disposal Personnel Inspection/Reporting/Sampling Supplies/Equipment	with planned N open-ended I least five year	MSS activities is m line and monthly t rs. The Date Req	onitored once the hereafter with a uired is the first dat	0.00 0.00 emonstr by the e an appr date of co tering 0.00 0.00	\$0 \$0 ating that an oper and of the 72-hour oved gas analyzer f non-compliance a mpliance. item (except for \$0 \$0 \$0 \$0	n/a period following the and maintain these and the Final Date is r one-time avoider \$0 \$0 \$0	\$0 e in association c creation of the records for at t the estimated d costs) \$0 \$0 \$0
Remediation/Disposal Permit Costs Other (as needed) Notes for DELAYED costs <b>Avoided Costs</b> Disposal Personnel Inspection/Reporting/Sampling Supplies/Equipment Financial Assurance ONE-TIME avoided costs	with planned N open-ended I least five year	MSS activities is m line and monthly t rs. The Date Req	onitored once the hereafter with a uired is the first dat	0.00 0.00 0.00 0.00 0.00 0.00 0.00 0.0	\$0 \$0 rating that an oper roved gas analyzer f non-compliance a mpliance. item (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	n/a period following the and maintain these and the Final Date is r one-time avoided \$0 \$0 \$0 \$0 \$0 \$0	\$0 e in association c creation of the records for at s the estimated d costs) \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0
Remediation/Disposal Permit Costs Other (as needed) Notes for DELAYED costs Disposal Personnel Inspection/Reporting/Sampling Supplies/Equipment Financial Assurance	with planned N open-ended I least five year	MSS activities is m line and monthly t rs. The Date Req	onitored once the hereafter with a uired is the first dat	0.00 0.00 0.00 0.00 0.00 0.00 0.00 0.0	\$0 \$0 ating that an oper and of the 72-hour oved gas analyzer f non-compliance a mpliance. item (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	n/a period following the and maintain these and the Final Date is r one-time avoide \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	\$0 e in association c creation of the records for at s the estimated d costs) \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0



	E	conomic	Benefit	Wo	rksheet		
Respondent Case ID No.							
Reg. Ent. Reference No.							
Media						<b>Percent Interest</b>	Years of
Violation No.	. 12						Depreciation
						5.0	15
	Item Cost	<b>Date Required</b>	Final Date	Yrs	Interest Saved	Costs Saved	EB Amount
Item Description	1						
Delayed Costs							
Equipment				0.00	\$0	\$0	\$0
Buildings				0.00	\$0	\$0	\$0
Other (as needed)				0.00	\$0	\$0	\$0
Engineering/Construction				0.00	\$0	\$0	\$0
Land				0.00	\$0	n/a	\$0
Record Keeping System	\$1,500	28-Mar-2016	1-Oct-2023	7.52	\$564	n/a	\$564
Training/Sampling				0.00	\$0	n/a	\$0
Remediation/Disposal				0.00	\$0	n/a	\$0
Permit Costs Other (as needed)				0.00	\$0 \$0	n/a	\$0
				s for th	e fixed roof storag	n/a e tanks used in MSS	
Notes for DELAYED costs	includes the d	lata and informati	ion as described uired is the first	s for th in NSR date of	e fixed roof storag Permit No. 84092	·	5 activities that e records for at
	includes the d least five year	ata and informati rs. The Date Req	ion as described uired is the first dat	s for th l in NSR date of e of cor	e fixed roof storag Permit No. 84092 f non-compliance a npliance.	e tanks used in MS 2 and maintain these and the Final Date is	5 activities that e records for at the estimated
Notes for DELAYED costs Avoided Costs Disposal	includes the d least five year	ata and informati rs. The Date Req	ion as described uired is the first dat	s for th l in NSR date of e of cor	e fixed roof storag Permit No. 84092 f non-compliance a npliance.	e tanks used in MSS and maintain these	5 activities that e records for at the estimated
Avoided Costs	includes the d least five year	ata and informati rs. The Date Req	ion as described uired is the first dat	s for th in NSR date of e of cor tering	e fixed roof storag Permit No. 84092 f non-compliance a npliance. item (except for	e tanks used in MSS and maintain these and the Final Date is <b>one-time avoide</b>	5 activities that e records for at the estimated d costs)
Avoided Costs Disposal	includes the d least five year	ata and informati rs. The Date Req	ion as described uired is the first dat	s for th in NSR date of e of cor tering 0.00	e fixed roof storag Permit No. 84092 f non-compliance a mpliance. item (except for \$0 \$0 \$0	e tanks used in MSS and maintain these and the Final Date is <b>one-time avoide</b> \$0 \$0 \$0	5 activities that e records for at the estimated d costs) \$0 \$0 \$0
Avoided Costs Disposal Personnel	includes the d least five year	ata and informati rs. The Date Req	ion as described uired is the first dat	s for th in NSR date of ce of cor <b>tering</b> 0.00 0.00	e fixed roof storag Permit No. 84092 f non-compliance a npliance. item (except for \$0 \$0	e tanks used in MSS and maintain these and the Final Date is r <b>one-time avoide</b> \$0 \$0	6 activities that e records for at the estimated d costs) \$0 \$0
Avoided Costs Disposal Personnel Inspection/Reporting/Sampling	includes the d least five year	ata and informati rs. The Date Req	ion as described uired is the first dat	s for th in NSR date of e of cor 0.00 0.00 0.00 0.00 0.00	e fixed roof storag Permit No. 84092 f non-compliance a mpliance. item (except for \$0 \$0 \$0 \$0 \$0 \$0	e tanks used in MSS and maintain these and the Final Date is r one-time avoide \$0 \$0 \$0 \$0 \$0 \$0 \$0	activities that records for at the estimated d costs) \$0 \$0 \$0 \$0 \$0 \$0
Avoided Costs Disposal Personnel Inspection/Reporting/Sampling Supplies/Equipment Financial Assurance ONE-TIME avoided costs	includes the d least five year	ata and informati rs. The Date Req	ion as described uired is the first dat	s for th in NSR date of e of cor tering 0.00 0.00 0.00 0.00 0.00 0.00	e fixed roof storag Permit No. 84092 f non-compliance a mpliance. item (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	e tanks used in MSS and maintain these and the Final Date is r one-time avoide \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	activities that records for at the estimated d costs) \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0
Avoided Costs Disposal Personnel Inspection/Reporting/Sampling Supplies/Equipment Financial Assurance	includes the d least five year	ata and informati rs. The Date Req	ion as described uired is the first dat	s for th in NSR date of e of cor 0.00 0.00 0.00 0.00 0.00	e fixed roof storag Permit No. 84092 f non-compliance a mpliance. item (except for \$0 \$0 \$0 \$0 \$0 \$0	e tanks used in MSS and maintain these and the Final Date is r one-time avoide \$0 \$0 \$0 \$0 \$0 \$0 \$0	activities that records for at the estimated d costs) \$0 \$0 \$0 \$0 \$0 \$0
Avoided Costs Disposal Personnel Inspection/Reporting/Sampling Supplies/Equipment Financial Assurance ONE-TIME avoided costs	includes the d least five year	ata and informati rs. The Date Req	ion as described uired is the first dat	s for th in NSR date of e of cor tering 0.00 0.00 0.00 0.00 0.00 0.00	e fixed roof storag Permit No. 84092 f non-compliance a mpliance. item (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	e tanks used in MSS and maintain these and the Final Date is r one-time avoide \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	activities that records for at the estimated d costs) \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0



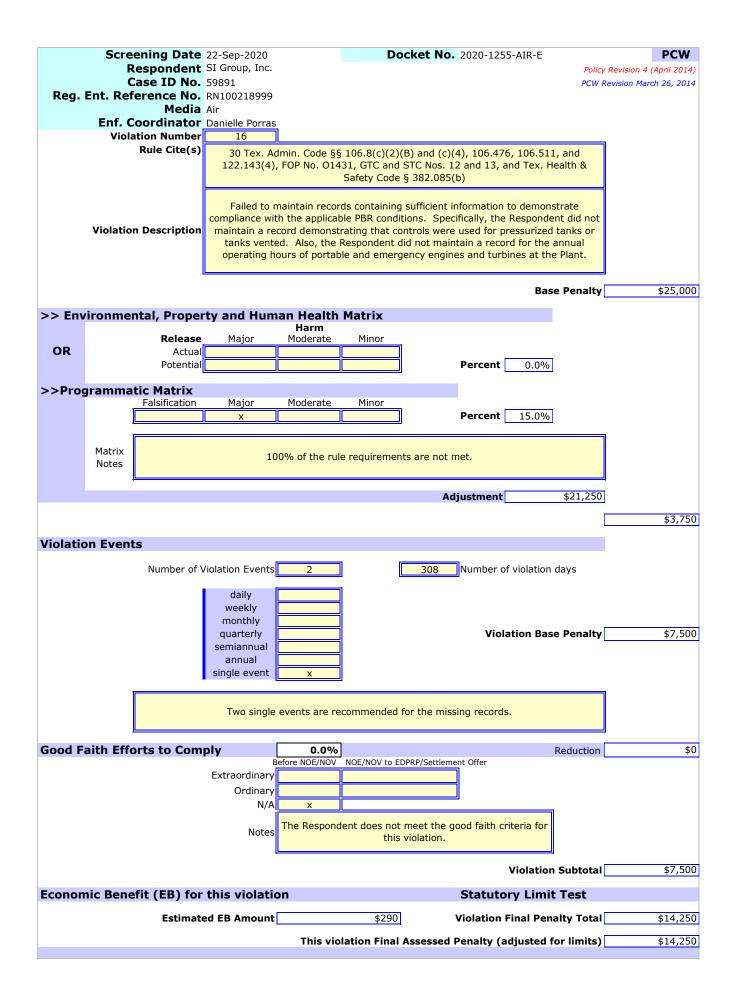
	E	conomic	Benefit	Wo	rksheet		
Respondent							
Case ID No.							
Reg. Ent. Reference No.							
Media Violation No.						<b>Percent Interest</b>	Years of Depreciation
VIOIACION NO.	15					5.0	15
	Item Cost	Date Required	Final Date	Vre	Interest Saved	Costs Saved	EB Amount
Item Description	Item cost	Date Required	That Date	113	Interest Saved	costs Saveu	ED Amount
Delayed Costs							
Equipment				0.00	\$0	\$0	\$0
Buildings				0.00	\$0	\$0	\$0
Other (as needed)				0.00	\$0	\$0	\$0
Engineering/Construction				0.00	\$0	\$0	\$0
Land	¢1 E00	20 Mar 2010	1.0++ 2022	0.00	\$0 #EC4	n/a	\$0
Record Keeping System Training/Sampling	\$1,500	28-Mar-2016	1-Oct-2023	7.52	<u>\$564</u> \$0	n/a n/a	\$564 \$0
Remediation/Disposal				0.00	\$0	n/a	\$0
Permit Costs				0.00	\$0	n/a	\$0
Other (as needed)				0.00	\$0	n/a	\$0
Notes for DELAYED costs	activities at	the Plant that inc se records for at I	ludes the data a east five years.	and info The D	rmation as describ	ks used to support p bed in NSR Permit N e first date of non-co bliance.	o. 84092 and
Avoided Costs	ANNUA	LIZE avoided c	osts before er	ntering	item (except for	r one-time avoide	d costs)
Disposal				0.00	\$0	\$0	\$0
Personnel				0.00	\$0	\$0	\$0
Inspection/Reporting/Sampling				0.00	\$0	\$0	\$0
Supplies/Equipment				0.00	\$0	\$0	\$0
Financial Assurance				0.00	\$0	\$0	\$0
ONE-TIME avoided costs				0.00	\$0 \$0	\$0	\$0 \$0
Other (as needed)				0.00	\$0	\$0	\$0
Notes for AVOIDED costs							
Approx. Cost of Compliance		\$1,500			TOTAL		\$564



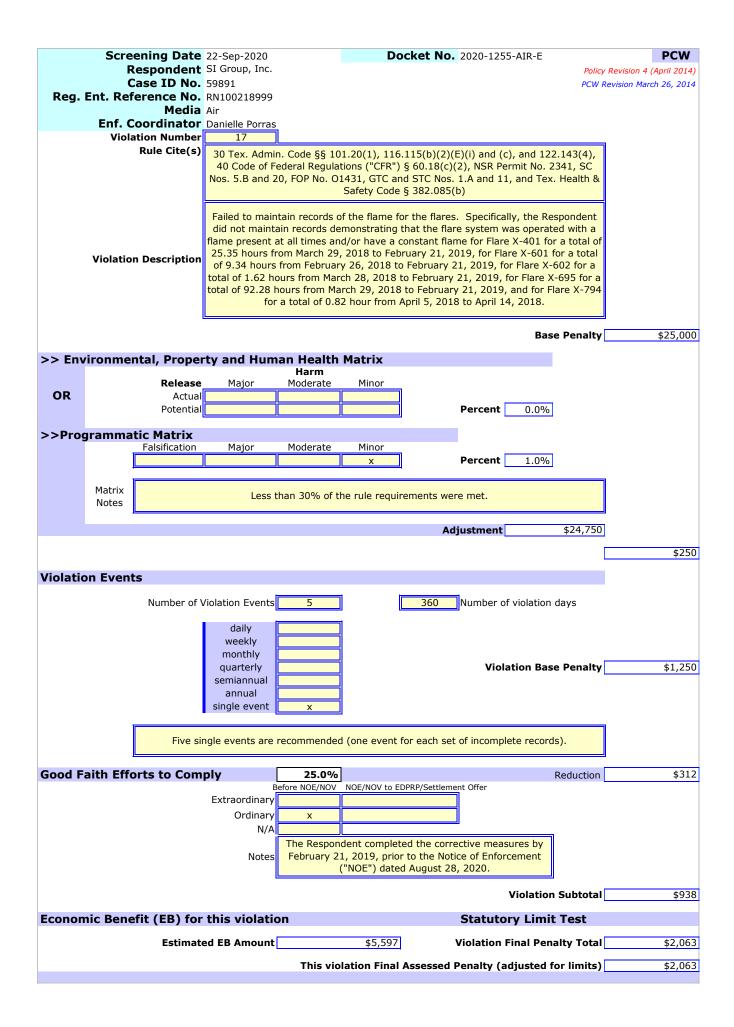
	E	conomic	Benefit	Wo	rksheet		
Respondent	SI Group, Inc.						
Case ID No.	59891						
Reg. Ent. Reference No.	RN100218999						
Media Violation No.	Air					Percent Interest	Years of Depreciation
	14					5.0	1
	Item Cost	Date Required	Final Date	Yrs	Interest Saved	Costs Saved	EB Amount
Item Description	I						
Delayed Costs		70		7			
Equipment				0.00	\$0	\$0	\$0
Buildings				0.00	\$0	\$0	\$0
Other (as needed)				0.00	\$0	\$0	\$0
Engineering/Construction				0.00	\$0	\$0	\$0
Land				0.00	\$0	n/a	\$0
Record Keeping System	\$1,500	28-Mar-2016	1-Oct-2023	7.52	\$564	n/a	\$564
Training/Sampling				0.00	\$0	n/a	\$0
Remediation/Disposal				0.00	\$0	n/a	\$0
Permit Costs				0.00	\$0	n/a	\$0
						ii/a	
Other (as needed)				0.00 ds for m	\$0 onthly emissions f	n/a n/a or the frac tanks us R Permit No. 84092	\$0 ed in support o
Notes for DELAYED costs	MSS activitie these records	es that includes th for at least five ye	e data and info ears. The Date the estima	0.00 ds for m rmation Require ated dat	\$0 onthly emissions f as specified in NS ed is the first date e of compliance.	n/a or the frac tanks us R Permit No. 84092 of compliance and t	\$0 ed in support o and maintain he Final Date i
Notes for DELAYED costs Avoided Costs	MSS activitie these records	es that includes th for at least five ye	e data and info ears. The Date the estima	0.00 ds for mation Require ated dat	\$0 onthly emissions f as specified in NS ed is the first date e of compliance. item (except for	n/a or the frac tanks us R Permit No. 84092 of compliance and t r one-time avoide	\$0 ed in support o and maintain he Final Date i d costs)
Notes for DELAYED costs Avoided Costs Disposal	MSS activitie these records	es that includes th for at least five ye	e data and info ears. The Date the estima	0.00 ds for m rmation Require ated dat tering 0.00	\$0 onthly emissions f as specified in NS ed is the first date e of compliance. item (except for \$0	n/a or the frac tanks us R Permit No. 84092 of compliance and t r <b>one-time avoide</b> \$0	\$0 ed in support c and maintain he Final Date i <b>d costs)</b> \$0
Notes for DELAYED costs Avoided Costs Disposal Personnel	MSS activitie these records	es that includes th for at least five ye	e data and info ears. The Date the estima	0.00 ds for mation Require ated dat tering 0.00	\$0 onthly emissions f as specified in NS ed is the first date e of compliance. item (except for \$0 \$0	n/a or the frac tanks us R Permit No. 84092 of compliance and t r <b>one-time avoide</b> \$0 \$0	\$0 ed in support of and maintain the Final Date i d costs) \$0 \$0
Notes for DELAYED costs Avoided Costs Disposal Personnel inspection/Reporting/Sampling	MSS activitie these records	es that includes th for at least five ye	e data and info ears. The Date the estima	0.00 ds for m rmation Require ated dat tering 0.00 0.00	\$0 onthly emissions f as specified in NS d is the first date e of compliance. item (except for \$0 \$0 \$0	n/a or the frac tanks us R Permit No. 84092 of compliance and t r one-time avoider \$0 \$0 \$0	\$0 ed in support of and maintain he Final Date i d costs) \$0 \$0 \$0
Notes for DELAYED costs <b>Avoided Costs</b> Disposal Personnel Inspection/Reporting/Sampling Supplies/Equipment	MSS activitie these records	es that includes th for at least five ye	e data and info ears. The Date the estima	0.00 ds for m rmation Require ated dat tering 0.00 0.00 0.00	\$0 onthly emissions f as specified in NS ed is the first date e of compliance. item (except for \$0 \$0 \$0 \$0 \$0	n/a or the frac tanks us R Permit No. 84092 of compliance and t r one-time avoide \$0 \$0 \$0 \$0 \$0	\$0 ed in support of and maintain he Final Date i d costs) \$0 \$0 \$0 \$0 \$0
Notes for DELAYED costs <b>Avoided Costs</b> Disposal Personnel Inspection/Reporting/Sampling Supplies/Equipment Financial Assurance	MSS activitie these records	es that includes th for at least five ye	e data and info ears. The Date the estima	0.00 ds for mation Require ated dat <b>tering</b> 0.00 0.00 0.00 0.00 0.00	\$0 onthly emissions f as specified in NS ed is the first date e of compliance. item (except for \$0 \$0 \$0 \$0 \$0 \$0	n/a or the frac tanks us R Permit No. 84092 of compliance and t r one-time avoide \$0 \$0 \$0 \$0 \$0 \$0 \$0	\$0 ed in support of and maintain he Final Date i \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0
Notes for DELAYED costs <b>Avoided Costs</b> Disposal Personnel Inspection/Reporting/Sampling Supplies/Equipment Financial Assurance ONE-TIME avoided costs	MSS activitie these records	es that includes th for at least five ye	e data and info ears. The Date the estima	0.00 ds for m rmation Require ated dat tering 0.00 0.00 0.00 0.00 0.00	\$0 onthly emissions f as specified in NS ed is the first date e of compliance. item (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	n/a or the frac tanks us R Permit No. 84092 of compliance and t r one-time avoide \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	\$0 ed in support of and maintain the Final Date i be final Date i s0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0
Notes for DELAYED costs <b>Avoided Costs</b> Disposal Personnel Inspection/Reporting/Sampling Supplies/Equipment Financial Assurance	MSS activitie these records	es that includes th for at least five ye	e data and info ears. The Date the estima	0.00 ds for mation Require ated dat <b>tering</b> 0.00 0.00 0.00 0.00 0.00	\$0 onthly emissions f as specified in NS ed is the first date e of compliance. item (except for \$0 \$0 \$0 \$0 \$0 \$0	n/a or the frac tanks us R Permit No. 84092 of compliance and t r one-time avoide \$0 \$0 \$0 \$0 \$0 \$0 \$0	\$0 ed in support of and maintain he Final Date i b f costs) \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0
Notes for DELAYED costs <b>Avoided Costs</b> Disposal Personnel Inspection/Reporting/Sampling Supplies/Equipment Financial Assurance ONE-TIME avoided costs	MSS activitie these records	es that includes th for at least five ye	e data and info ears. The Date the estima	0.00 ds for m rmation Require ated dat tering 0.00 0.00 0.00 0.00 0.00	\$0 onthly emissions f as specified in NS ed is the first date e of compliance. item (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	n/a or the frac tanks us R Permit No. 84092 of compliance and t r one-time avoide \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	\$0 ed in support of and maintain the Final Date before the final Date and costs) \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0
Notes for DELAYED costs Disposal Personnel Inspection/Reporting/Sampling Supplies/Equipment Financial Assurance ONE-TIME avoided costs Other (as needed)	MSS activitie these records	es that includes th for at least five ye	e data and info ears. The Date the estima	0.00 ds for m rmation Require ated dat tering 0.00 0.00 0.00 0.00 0.00	\$0 onthly emissions f as specified in NS ed is the first date e of compliance. item (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	n/a or the frac tanks us R Permit No. 84092 of compliance and t r one-time avoide \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	\$0 ed in support c and maintain the Final Date i b f costs) \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0

Responden	e 22-Sep-2020	Docket No. 2020-1255-AIR-E	PCW
	t SI Group, Inc.		Revision 4 (April 2014)
Case ID No		PCW R	evision March 26, 2014
Reg. Ent. Reference No Medi			
Enf. Coordinato			
Violation Number			
Rule Cite(s	) 30 Tex. Admin	. Code §§ 106.8(c)(2)(B) and (c)(4), 106.263(g)(3), and 122.143(4),	
		31, GTC and STC Nos. 12 and 13, and Tex. Health & Safety Code §	
		382.085(b)	
	Epiled to a	pointain records containing sufficient information to domonstrate	
	compliance w	naintain records containing sufficient information to demonstrate th the applicable Permit by Rule ("PBR") conditions. Specifically, the	
Violation Descriptio		d not maintain a record of all MSS activities at the Plant that included	
		the date, time, and duration of each MSS activity.	
		Base Penalty	\$25,000
		en Heelth Metric	
>> Environmental, Prop	erty and Hum	an Health Matrix Harm	
Releas	<b>e</b> Major	Moderate Minor	
OR Actu			
Potenti	31	Percent 0.0%	
>>Programmatic Matrix			
Falsification	Major	Moderate Minor	
	х	Percent 15.0%	
Matrix	10	0% of the rule requirements were not met.	
Notes	10	5% of the rule requirements were not met.	
		Adjustment \$21,250	
		Г	\$3,750
			+=/.==
Violation Events			
Number o	Violation Events	1 308 Number of violation days	
	daily		
	weekly monthly		
	quarterly	Violation Base Penalty	\$3,750
	semiannual		437730
	annual		
	single event	X	
	One sinc	le event is recommended for the missing record.	
Good Faith Efforts to Cor	nniv	0.0% Poduction	¢∩
Good Faith Efforts to Cor		0.0% Reduction Reduction	\$0
Good Faith Efforts to Cor			\$0
Good Faith Efforts to Cor	E		\$0
Good Faith Efforts to Cor	Extraordinary	efore NOE/NOV NOE/NOV to EDPRP/Settlement Offer	\$0
Good Faith Efforts to Cor	Extraordinary Ordinary N/A	efore NOE/NOV NOE/NOV to EDPRP/Settlement Offer	\$0
Good Faith Efforts to Cor	Extraordinary Ordinary	efore NOE/NOV NOE/NOV to EDPRP/Settlement Offer	\$0
Good Faith Efforts to Cor	Extraordinary Ordinary N/A	efore NOE/NOV NOE/NOV to EDPRP/Settlement Offer	
Good Faith Efforts to Cor	Extraordinary Ordinary N/A	efore NOE/NOV NOE/NOV to EDPRP/Settlement Offer	
Good Faith Efforts to Cor	Extraordinary Ordinary N/A Notes	efore NOE/NOV NOE/NOV to EDPRP/Settlement Offer	
Economic Benefit (EB) fo	Extraordinary Ordinary N/A Notes	efore NOE/NOV NOE/NOV to EDPRP/Settlement Offer       x       x       The Respondent does not meet the good faith criteria for this violation.       Violation Subtotal       on	\$3,750
Economic Benefit (EB) fo	Extraordinary Ordinary N/A Notes	efore NOE/NOV NOE/NOV to EDPRP/Settlement Offer	

	E	conomic	Benefit	Wo	rksheet		
Respondent	SI Group, Inc.						
Case ID No.							
Reg. Ent. Reference No.							
Media						Percent Interest	Years of
Violation No.	15						Depreciation
						5.0	15
	Item Cost	Date Required	Final Date	Yrs	Interest Saved	Costs Saved	EB Amount
Item Description							
-							
Delayed Costs							
Equipment				0.00	\$0	\$0	\$0
Buildings				0.00	\$0	\$0	\$0
Other (as needed)				0.00	\$0	\$0	\$0
Engineering/Construction				0.00	\$0	\$0	\$0
Land				0.00	\$0	n/a	\$0
Record Keeping System	\$1,500	19-Nov-2019	1-Oct-2023	3.87	\$290	n/a	\$290
Training/Sampling				0.00	\$0	n/a	\$0
Remediation/Disposal				0.00	\$0	n/a	\$0
Permit Costs				0.00	\$0	n/a	\$0
Other (as needed)				0.00	\$0	n/a	\$0
Notes for DELAYED costs	time, and Requ	duration of each N lired is the investi	ASS activity and gation date and	l mainta the Fin	ain these records f al Date is the estin	t the Plant that inclu or at least five years nated date of compl	iance.
Avoided Costs	ANNU	ALIZE avoided c	osts before er		<u> </u>	r one-time avoide	
Disposal				0.00	\$0	\$0	\$0
Personnel				0.00	\$0	\$0	\$0
Inspection/Reporting/Sampling				0.00	\$0	\$0	\$0
Supplies/Equipment				0.00	\$0	\$0	\$0
Financial Assurance				0.00	\$0	\$0	\$0
ONE-TIME avoided costs				0.00	\$0	\$0	\$0
Other (as needed)				0.00	\$0	\$0	\$0
Notes for AVOIDED costs							
Approx. Cost of Compliance		\$1,500			TOTAL		\$290



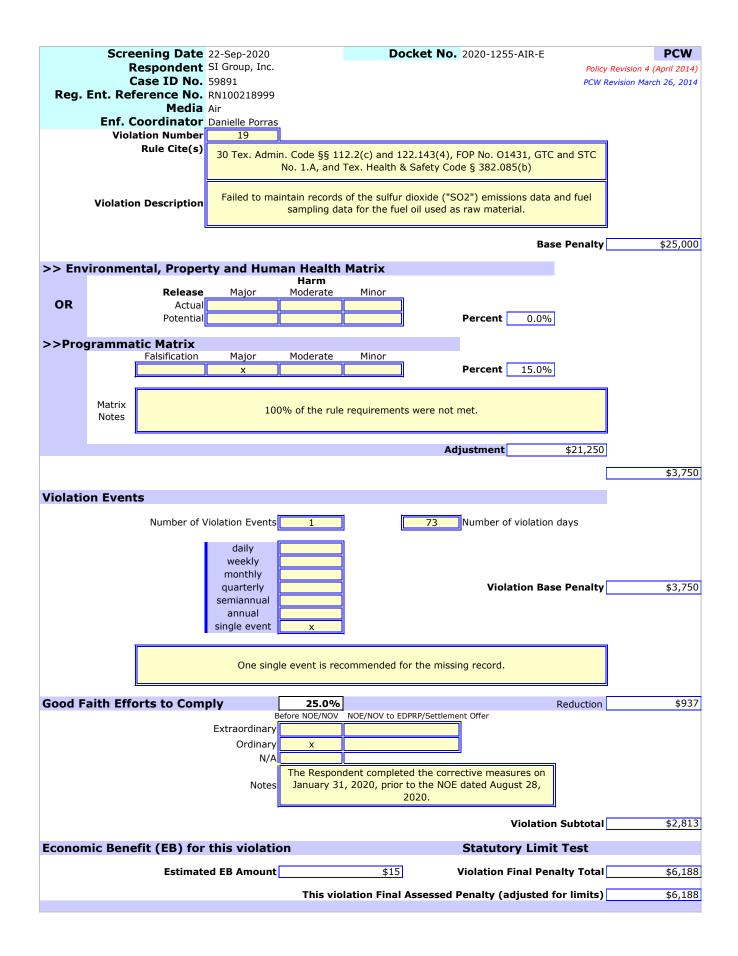
	E	conomic	Benefit	Wo	rksheet		
Respondent	SI Group, Inc.						
Case ID No.	59891						
leg. Ent. Reference No.	RN100218999						
Media Violation No.	Air					Percent Interest	Years of Depreciation
	10					5.0	
	Item Cost	Date Required	Final Date	Yrs	Interest Saved	Costs Saved	EB Amount
Item Description	l i i i i i i i i i i i i i i i i i i i						
Delayed Costs		1					
Equipment				0.00	\$0	\$0	\$0
Buildings				0.00	\$0	\$0	\$0
Other (as needed)				0.00	\$0	\$0	\$0
Engineering/Construction				0.00	\$0	\$0	\$0
Land				0.00	\$0	n/a	\$0
Record Keeping System	\$1,500	19-Nov-2019	1-Oct-2023	3.87	\$290	n/a	\$290
Training/Sampling				0.00	\$0	n/a	\$0
					\$0	n/a	\$0
Remediation/Disposal				0.00			
Permit Costs				0.00	\$0	n/a	\$0
Permit Costs Other (as needed)		5	5	0.00 0.00	\$0 \$0 htrols used for the		\$0 \$0 or tanks vented
Permit Costs Other (as needed) Notes for DELAYED costs	and annual op these records	erating hours for for at least five y	the portable ar ears. The Date estimate	0.00 0.00 ds of cor d emerge Requir ed date	\$0 \$0 ntrols used for the gency engines and ed is the investiga of compliance.	n/a n/a pressurized tanks o turbines at the Plar tion date and the Fi	\$0 \$0 In tanks vented Int and maintai Inal Date is the
Permit Costs Other (as needed) Notes for DELAYED costs Avoided Costs	and annual op these records	erating hours for for at least five y	the portable ar ears. The Date estimate	0.00 0.00 ds of cor d emerge Requir ed date	\$0 \$0 ntrols used for the gency engines and ed is the investiga of compliance. item (except for	n/a n/a pressurized tanks o turbines at the Plar tion date and the Fi one-time avoide	\$0 \$0 In tanks vented Int and maintai Inal Date is the Ind costs)
Permit Costs Other (as needed) Notes for DELAYED costs Avoided Costs Disposal	and annual op these records	erating hours for for at least five y	the portable ar ears. The Date estimate	0.00 0.00 ds of cor d emerge Requir ed date <b>ntering</b> 0.00	\$0 \$0 htrols used for the gency engines and ed is the investiga of compliance. item (except for \$0	n/a n/a pressurized tanks o turbines at the Plar tion date and the Fi one-time avoide \$0	\$0 \$0 or tanks vented and maintain nal Date is the d costs) \$0
Permit Costs Other (as needed) Notes for DELAYED costs <b>Avoided Costs</b> Disposal Personnel	and annual op these records	erating hours for for at least five y	the portable ar ears. The Date estimate	0.00 0.00 ds of cor d emerge Requir ed date tering 0.00	\$0 \$0 htrols used for the gency engines and ed is the investiga of compliance. item (except for \$0 \$0 \$0	n/a n/a pressurized tanks o turbines at the Plar tion date and the Fi one-time avoider \$0 \$0	\$0 \$0 or tanks vented nat and maintai nal Date is the d costs) \$0 \$0
Permit Costs Other (as needed) Notes for DELAYED costs <b>Avoided Costs</b> Disposal Personnel Inspection/Reporting/Sampling	and annual op these records	erating hours for for at least five y	the portable ar ears. The Date estimate	0.00 0.00 ds of cor d emerge Requir ed date tering 0.00 0.00	\$0 \$0 htrols used for the gency engines and ed is the investiga of compliance. item (except for \$0 \$0 \$0 \$0	n/a n/a pressurized tanks o turbines at the Plar tion date and the Fi one-time avoided \$0 \$0 \$0	\$0 \$0 r tanks ventec nt and maintai nal Date is the <b>d costs)</b> \$0 \$0 \$0
Permit Costs Other (as needed) Notes for DELAYED costs <b>Avoided Costs</b> Disposal Personnel nspection/Reporting/Sampling Supplies/Equipment	and annual op these records	erating hours for for at least five y	the portable ar ears. The Date estimate	0.00 0.00 ds of cor d emerge Requir ed date tering 0.00 0.00 0.00	\$0 \$0 htrols used for the gency engines and ed is the investiga of compliance. item (except for \$0 \$0 \$0 \$0 \$0 \$0	n/a n/a pressurized tanks o turbines at the Plar tion date and the Fi one-time avoided \$0 \$0 \$0 \$0	\$0 \$0 or tanks vented and maintai nal Date is the d costs) \$0 \$0 \$0 \$0
Permit Costs Other (as needed) Notes for DELAYED costs Disposal Personnel Inspection/Reporting/Sampling Supplies/Equipment Financial Assurance	and annual op these records	erating hours for for at least five y	the portable ar ears. The Date estimate	0.00 0.00 ds of cor e Requir ed date tering 0.00 0.00 0.00	\$0 \$0 htrols used for the gency engines and ed is the investiga of compliance. item (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	n/a n/a pressurized tanks o turbines at the Plar tion date and the Fi one-time avoided \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	\$0 \$0 or tanks vented and maintai nal Date is the d costs) \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0
Permit Costs Other (as needed) Notes for DELAYED costs Disposal Personnel Inspection/Reporting/Sampling Supplies/Equipment Financial Assurance ONE-TIME avoided costs	and annual op these records	erating hours for for at least five y	the portable ar ears. The Date estimate	0.00 0.00 0.00 0.00 0.00 0.00 0.00 0.0	\$0 \$0 htrols used for the gency engines and ed is the investiga of compliance. item (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	n/a n/a pressurized tanks o turbines at the Plar tion date and the Fi one-time avoide \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	\$0 \$0 or tanks vented ont and maintai nal Date is the d costs) \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0
Permit Costs Other (as needed) Notes for DELAYED costs Disposal Personnel Inspection/Reporting/Sampling Supplies/Equipment Financial Assurance	and annual op these records	erating hours for for at least five y	the portable ar ears. The Date estimate	0.00 0.00 ds of cor e Requir ed date tering 0.00 0.00 0.00	\$0 \$0 htrols used for the gency engines and ed is the investiga of compliance. item (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	n/a n/a pressurized tanks o turbines at the Plar tion date and the Fi one-time avoided \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	\$0 \$0 or tanks vented and maintai nal Date is the d costs) \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0
Permit Costs Other (as needed) Notes for DELAYED costs Disposal Personnel Inspection/Reporting/Sampling Supplies/Equipment Financial Assurance ONE-TIME avoided costs	and annual op these records	erating hours for for at least five y	the portable ar ears. The Date estimate	0.00 0.00 0.00 0.00 0.00 0.00 0.00 0.0	\$0 \$0 htrols used for the gency engines and ed is the investiga of compliance. item (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	n/a n/a pressurized tanks o turbines at the Plar tion date and the Fi one-time avoide \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	\$0 \$0 or tanks vented and maintai nal Date is the d costs) \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0
Permit Costs Other (as needed) Notes for DELAYED costs <b>Avoided Costs</b> Disposal Personnel Inspection/Reporting/Sampling Supplies/Equipment Financial Assurance ONE-TIME avoided costs Other (as needed)	and annual op these records	erating hours for for at least five y	the portable ar ears. The Date estimate	0.00 0.00 0.00 0.00 0.00 0.00 0.00 0.0	\$0 \$0 htrols used for the gency engines and ed is the investiga of compliance. item (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	n/a n/a pressurized tanks o turbines at the Plar tion date and the Fi one-time avoide \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	\$0 \$0 or tanks vented and maintain nal Date is the d costs) \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0



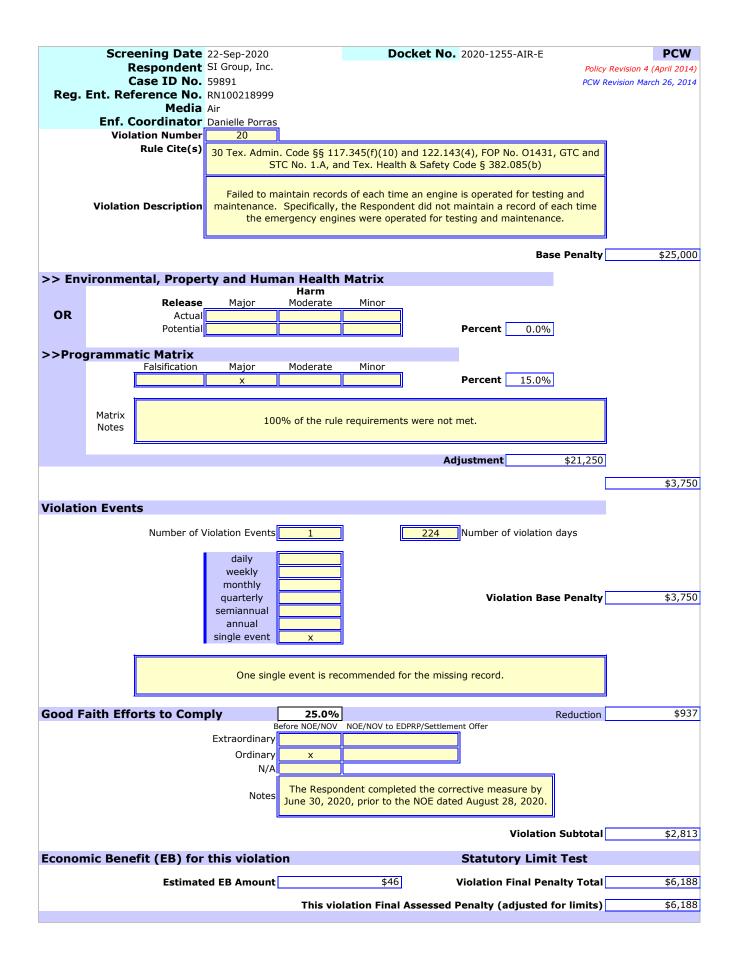
	E	conomic	Benefit	Wo	rksheet		
Respondent Case ID No. Reg. Ent. Reference No.	59891 RN100218999						
Media Violation No.						Percent Interest	Years of Depreciation
						5.0	15
	Item Cost	<b>Date Required</b>	Final Date	Yrs	Interest Saved	Costs Saved	EB Amount
Item Description							
Delayed Costs							
Equipment	\$80,000	26-Feb-2018	21-Feb-2019	0.99	\$263	\$5,260	\$5,523
Buildings				0.00	\$0	\$0	\$0
Other (as needed)				0.00	\$0	\$0	\$0
Engineering/Construction				0.00	\$0	\$0	\$0
Land				0.00	\$0	n/a	\$0
Record Keeping System				0.00	\$0	n/a	\$0
Training/Sampling				0.00	\$0	n/a	\$0
Remediation/Disposal				0.00	\$0	n/a	\$0
Permit Costs Other (as needed)	\$1,500	26-Feb-2018	21 Eab 2010	0.00	<u>\$0</u> \$74	n/a n/a	<u>\$0</u> \$74
Notes for DELAYED costs	(\$20,00) instrumenta flame present	00/flare) and to in tion indicate a los	nplement a prog s of the pilot in or have a consta 0). The Dates Re	ram to order to ant flam equired	conduct visual pilo o ensure that the f ne for Flare X-401,	, Flare X-601, and F ot confirmations in t flare systems are op Flare X-601, Flare e of noncompliance	he event erated with a X-602, Flare X-
Avoided Costs	ANNU/	ALIZE avoided c	osts before en	tering	item (except for	r one-time avoide	d costs)
Disposal				0.00	\$0	\$0	\$0
Personnel				0.00	\$0	\$0	\$0
Inspection/Reporting/Sampling				0.00	\$0	\$0	\$0
Supplies/Equipment				0.00	\$0	\$0	\$0
Financial Assurance				0.00	\$0	\$0	\$0
ONE-TIME avoided costs				0.00	\$0 \$0	\$0 \$0	<u>\$0</u> \$0
Other (as needed) Notes for AVOIDED costs		J		0.00	1 ⊅U	50	<u>\$0</u>
Approx. Cost of Compliance		\$81,500			TOTAL		\$5,597

		ening Date		Docket No. 2020-1255-AIR-E	PCW
		espondent ase ID No.	SI Group, Inc.		y Revision 4 (April 2014)
Rea.			RN100218999	PCW	Revision March 26, 2014
		Media	Air		
		oordinator	Danielle Porras		
	VIUIA	Rule Cite(s)		Code §§ 116.115(c) and 122.143(4), NSR Permit No. 2341, SC No.	
				O1431, GTC and STC No. 11, and Tex. Health & Safety Code §	
				382.085(b)	
			Failed to lin	nit the waste gas stream flow to Flare X-501. Specifically, the	
	Violation	n Description		eeded the waste gas stream flow limit of 8,440 standard cubic feet ") to Flare X-501 by a range of 8,839 scf/hr to 12,376 scf/hr for 45	
				hour periods from February 22, 2018 to June 29, 2018.	
				Base Penalty	\$25,000
>> Env	vironmer	ntal, Proper	ty and Huma	n Health Matrix	
		Release	Major	Harm Moderate Minor	
OR		Actual		X	
		Potential		<b>Percent</b> 15.0%	
>>Prog	gramma	tic Matrix			
	Ţ	Falsification	Major	Moderate Minor Percent 0.0%	
	ļ				=
	Matrix	Human health	n or the environm	ent has been exposed to insignificant amounts of pollutants that do	
	Notes			are protective of human health or environmental receptors.	
	l				
				Adjustment \$21,250	
					\$3,750
Violatio	on Event	S			
		Number of )	/iolation Events	2 127 Number of violation days	
		Number of V		2 Number of violation days	
			daily		
			weekly monthly		
			quarterly	× Violation Base Penalty	\$7,500
			semiannual		
			single event		
	I				٦
		Two quarter	•	mmended for the instances of non-compliance that occurred from February 22, 2018 to June 19, 2018.	
Good F	aith Effo	orts to Com		25.0% Reduction	\$1,875
			Bef Extraordinary	ore NOE/NOV NOE/NOV to EDPRP/Settlement Offer	
			Ordinary	x	
			N/A		
				The Respondent completed the corrective measures on	
				lune 29, 2018, prior to the NOE dated August 28, 2020.	
				Violation Subtota	\$5,625
Econon	nic Bene	fit (EB) for	this violation	n Statutory Limit Test	
		Estimate	ed EB Amount	\$87 Violation Final Penalty Tota	\$12,375
				This violation Final Assessed Penalty (adjusted for limits)	
				This violation rinal Assessed reliaity (aujusted for limits)	۲۲,215

	E	conomic	Benefit	Wo	rksheet		
Respondent	SI Group, Inc.						
Case ID No.	59891						
Reg. Ent. Reference No.							
Media							Years of
Violation No.						Percent Interest	Depreciation
	10					F 0	
						5.0	15
	Item Cost	Date Required	Final Date	Yrs	Interest Saved	Costs Saved	EB Amount
Item Description							
Delayed Costs							
Equipment				0.00	\$0	\$0	\$0
Buildings				0.00	\$0	\$0	\$0
Other (as needed)				0.00	\$0	\$0	\$0
Engineering/Construction				0.00	\$0	\$0	\$0
Land				0.00	\$0	n/a	\$0
Record Keeping System				0.00	\$0	n/a	\$0
Training/Sampling				0.00	\$0	n/a	\$0
Remediation/Disposal				0.00	\$0	n/a	\$0
Permit Costs	\$5,000	22-Feb-2018	29-Jun-2018	0.35	\$87	n/a	\$87
Other (as needed)				0.00	\$0	n/a	\$0
Notes for DELAYED costs	501. The Da	te Required is the	e first date of no	on-com	pliance and the Fin	e gas stream flow lir al Date is the date o	of compliance.
Avoided Costs	ANNUA	LIZE avoided o	osts before er			one-time avoide	
Disposal				0.00	\$0	\$0	\$0
Personnel				0.00	\$0	\$0	\$0
Inspection/Reporting/Sampling				0.00	\$0	\$0	\$0
Supplies/Equipment				0.00	\$0	\$0	\$0
Financial Assurance				0.00	\$0	\$0	\$0
ONE-TIME avoided costs				0.00	\$0	\$0	\$0
Other (as needed)				0.00	\$0	\$0	\$0
Notes for AVOIDED costs							
Approx. Cost of Compliance		\$5,000			TOTAL		\$87



	E	conomic	Benefit	Wo	rksheet		
Respondent	SI Group, Inc.						
Case ID No.							
Reg. Ent. Reference No.							
Media						<b>Percent Interest</b>	Years of
Violation No.	, 19						Depreciation
						5.0	1!
	Item Cost	<b>Date Required</b>	Final Date	Yrs	Interest Saved	Costs Saved	EB Amount
Item Description							
Delayed Costs							
Delayed Costs	·	1		0.00	¢0	¢0	¢0
Equipment Buildings				0.00	\$0 \$0	\$0 \$0	<u>\$0</u> \$0
Other (as needed)				0.00	\$0	\$0 \$0	<u>\$0</u> \$0
Engineering/Construction				0.00	\$0	\$0	<u>\$0</u> \$0
Land				0.00	\$0	n/a	\$0 \$0
Record Keeping System	\$1,500	19-Nov-2019	31-Jan-2020	0.00	\$15	n/a	\$15
Training/Sampling	\$1,500	19-100-2019	51-Jan-2020	0.20	\$0	n/a	\$0
Remediation/Disposal				0.00	\$0	n/a	\$0
Permit Costs				0.00	\$0	n/a	\$0
Other (as needed)				0.00	\$0	n/a	<u>\$0</u> \$0
		-	-			lata and fuel sampli	•
Notes for DELAYED costs	fuel oil used a	as raw material.	The Date Requir	ed is th compli	e investigation dat ance.	te and the Final Date	e is the date of
Avoided Costs	fuel oil used a	as raw material.	The Date Requir	ed is th compli	e investigation dat ance. item (except for	te and the Final Date	e is the date of d costs)
Avoided Costs Disposal	fuel oil used a	as raw material.	The Date Requir	ed is th compli tering 0.00	e investigation dat ance. item (except for \$0	te and the Final Date	e is the date of d costs) \$0
Avoided Costs Disposal Personnel	fuel oil used a	as raw material.	The Date Requir	ed is th compli tering 0.00 0.00	e investigation dat ance. item (except for \$0 \$0	te and the Final Date	e is the date of d costs) \$0 \$0
Avoided Costs Disposal Personnel inspection/Reporting/Sampling	fuel oil used a	as raw material.	The Date Requir	ed is th compli tering 0.00 0.00 0.00	e investigation dal ance. item (except for \$0 \$0 \$0	r one-time avoide \$0 \$0 \$0	e is the date of d costs) \$0 \$0 \$0
Avoided Costs Disposal Personnel nspection/Reporting/Sampling Supplies/Equipment	fuel oil used a	as raw material.	The Date Requir	ed is th compli <b>tering</b> 0.00 0.00 0.00 0.00	e investigation dal ance. item (except for \$0 \$0 \$0 \$0 \$0	r one-time avoide \$0 \$0 \$0 \$0 \$0 \$0	e is the date of \$0 \$0 \$0 \$0 \$0 \$0 \$0
Avoided Costs Disposal Personnel Inspection/Reporting/Sampling Supplies/Equipment Financial Assurance	fuel oil used a	as raw material.	The Date Requir	ed is th compli 0.00 0.00 0.00 0.00 0.00	e investigation dat ance. item (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	r one-time avoide \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	d costs) \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0
Avoided Costs Disposal Personnel Inspection/Reporting/Sampling Supplies/Equipment Financial Assurance ONE-TIME avoided costs	fuel oil used a	as raw material.	The Date Requir	ed is th compli 0.00 0.00 0.00 0.00 0.00 0.00 0.00	e investigation dat ance. item (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	r one-time avoide \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	d costs) \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0
Avoided Costs Disposal Personnel nspection/Reporting/Sampling Supplies/Equipment Financial Assurance	fuel oil used a	as raw material.	The Date Requir	ed is th compli 0.00 0.00 0.00 0.00 0.00	e investigation dat ance. item (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	r one-time avoide \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	d costs) \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0
Avoided Costs Disposal Personnel inspection/Reporting/Sampling Supplies/Equipment Financial Assurance ONE-TIME avoided costs	fuel oil used a	as raw material.	The Date Requir	ed is th compli 0.00 0.00 0.00 0.00 0.00 0.00 0.00	e investigation dat ance. item (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	r one-time avoide \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	d costs) \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0



	E	conomic	Benefit	Wo	rksheet		
Respondent							
Case ID No.							
Reg. Ent. Reference No.							
Media							Years of
Violation No.						Percent Interest	Depreciation
violation No.	20						
						5.0	15
	Item Cost	Date Required	Final Date	Yrs	Interest Saved	Costs Saved	EB Amount
Item Description							
Delayed Costs							
Equipment				0.00	\$0	\$0	\$0
Buildings				0.00	\$0	\$0	\$0
Other (as needed)				0.00	\$0	\$0	\$0
Engineering/Construction				0.00	\$0	\$0	\$0
Land				0.00	\$0	n/a	\$0
Record Keeping System	\$1,500	19-Nov-2019	30-Jun-2020	0.61	\$46	n/a	\$46
Training/Sampling				0.00	\$0	n/a	\$0
Remediation/Disposal				0.00	\$0	n/a	\$0
Permit Costs				0.00	\$0	n/a	\$0
Other (as needed)				0.00	\$0	n/a	\$0
Notes for DELAYED costs	maintaining r Da	ecords for each ti te Required is the	ime the emerge e investigation o	ncy eng date and	ines are operated d the Final Date is	e emergency engine for testing and main the date of complian	ntenance. The nce.
Avoided Costs	ANNU	ALIZE avoided o	osts before er			r one-time avoide	
Disposal				0.00	\$0	\$0	\$0
Personnel				0.00	\$0	\$0	\$0
Inspection/Reporting/Sampling				0.00	\$0	\$0	\$0
Supplies/Equipment				0.00	\$0	\$0	\$0
Financial Assurance				0.00	\$0	\$0	\$0
ONE-TIME avoided costs				0.00	\$0	\$0	\$0
Other (as needed)				0.00	\$0	\$0	\$0
Notes for AVOIDED costs							
Approx. Cost of Compliance		\$1,500			TOTAL		\$46

		ening Date		Docket No. 2020-1255-AIR-E	PCW
		Respondent Case ID No.			<ul> <li><i>Revision 4 (April 2014)</i></li> <li><i>Revision March 26, 2014</i></li> </ul>
Reg.		ference No.			(CVISION Planen 20, 2011
	Enf (	Media	Air Danielle Porras		
		ation Number	21		
		Rule Cite(s)	30 Tex. Admin. C	Code §§ 101.20(1), 116.115(b)(2)(E)(i) and (c), and 122.143(4),	
				8(c)(3)(ii), NSR Permit No. 2341, SC Nos. 5.D and 20, FOP No. and STC No. 11, and Tex. Health & Safety Code § 382.085(b)	
			01431, GIC 8		-
			Failed to maintain	records of the net heating values for the flares. Specifically, the	
	Violatio	n Description	Respondent did no	ot maintain a record demonstrating that the net heating values for	
			the fla	red gas was recorded at least once every 15 minutes.	
		l	<u> </u>	Base Penalty	\$25,000
	_				\$23,000
>> Env	Ironme	ntal, Propei	ty and Human	Health Matrix Harm	
OR		<b>Release</b> Actual	Major M	1oderate Minor	
UK		Potential		Percent 0.0%	
		tic Matuix			
>>Prog	gramma	tic Matrix Falsification	Major M	loderate Minor	
				x Percent 1.0%	
	Matuit				
	Matrix Notes		Less thar	1 30% of the rule requirements were met.	
				Adjustment \$24,750	
					\$250
Violatio	on Even	ts			
		Number of \	/iolation Events	1 Number of violation days	
			daily		
			weekly		
			monthly quarterly	Violation Base Penalty	\$250
			semiannual		φ250
			annual single event	× 1	
			Single event		-
			One single eve	ent is recommended for the incomplete record.	
				· · · · · · · · · · · · · · · · · · ·	
Good F	aith Effe	orts to Com		25.0% Reduction	\$62
			Befor Extraordinary	e NOE/NOV NOE/NOV to EDPRP/Settlement Offer	
			Ordinary	x	
			N/A		
				he Respondent completed the corrective measures on uly 1, 2020, prior to the NOE dated August 28, 2020.	
				Violation Subtotal	\$188
Econon	nic Bene	efit (EB) for	this violation	Statutory Limit Test	
		Estimate	ed EB Amount	\$123 Violation Final Penalty Total	\$413
				This violation Final Assessed Penalty (adjusted for limits)	
				totation i mai noscosca i charty (aujustea for minits)	LIF¢

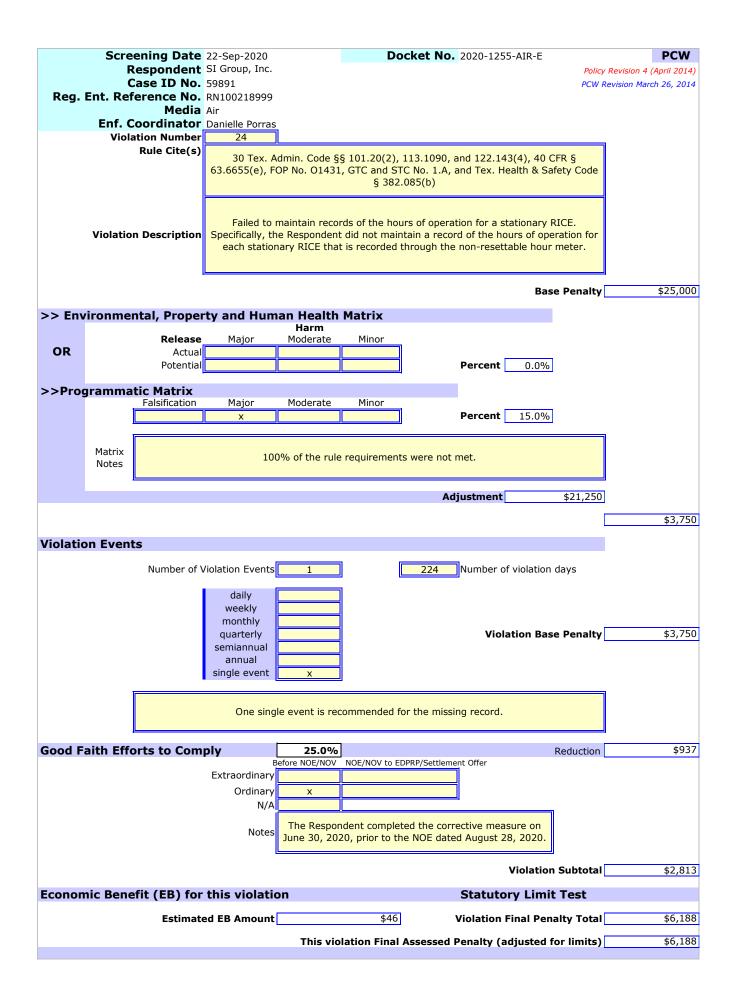
	E	conomic	Benefit	Wo	rksheet		
Respondent							
Case ID No.							
leg. Ent. Reference No.	RN100218999						
Media Violation No.	Air					Percent Interest	Years of Depreciation
						5.0	15
	Item Cost	<b>Date Required</b>	Final Date	Yrs	Interest Saved	Costs Saved	EB Amount
Item Description							
Delayed Costs							
Equipment				0.00	\$0	\$0	\$0
Buildings				0.00	\$0	\$0	\$0
Other (as needed)				0.00	\$0	\$0	\$0
Engineering/Construction				0.00	\$0	\$0	\$0
Land				0.00	\$0	n/a	\$0
Record Keeping System	\$1,500	12-Nov-2018	1-Jul-2020	1.64	\$123	n/a	\$123
Training/Sampling				0.00	\$0	n/a	\$0
<b>Remediation/Disposal</b>				0.00	\$0	n/a	\$0
Permit Costs				0.00	\$0	n/a	\$0
Other (as needed)				0.00 he reco	\$0 rds needed for the	n/a flared gas and beg	\$0 in maintaining
	records dem	onstrating that th	e net heating v	0.00 he reco alues fo	\$0 rds needed for the r the flared gas ar the revised permit	n/a	\$0 in maintaining once every 15
Other (as needed) Notes for DELAYED costs	records dem minutes. Th	onstrating that th ne Date Required	e net heating v is the effective	he recor alues fo date of compli	\$0 rds needed for the r the flared gas ar the revised permit ance.	n/a flared gas and begi e recorded at least and the Final Date	\$0 in maintaining once every 15 is the date of
Other (as needed) Notes for DELAYED costs Avoided Costs	records dem minutes. Th	onstrating that th ne Date Required	e net heating v is the effective	0.00 he reco alues fo date of compli	\$0 rds needed for the r the flared gas ar the revised permit ance. item (except for	n/a flared gas and begi e recorded at least and the Final Date one-time avoide	\$0 in maintaining once every 15 is the date of <b>d costs)</b>
Other (as needed) Notes for DELAYED costs Avoided Costs Disposal	records dem minutes. Th	onstrating that th ne Date Required	e net heating v is the effective	0.00 he reco alues fo date of compli tering 0.00	\$0 rds needed for the r the flared gas ar the revised permit ance. item (except for \$0	n/a flared gas and begi e recorded at least and the Final Date r one-time avoide \$0	\$0 in maintaining once every 15 is the date of d costs) \$0
Other (as needed) Notes for DELAYED costs <b>Avoided Costs</b> Disposal Personnel	records dem minutes. Th	onstrating that th ne Date Required	e net heating v is the effective	0.00 he reco alues fo date of compli	\$0 rds needed for the r the flared gas ar the revised permit ance. item (except for \$0 \$0	n/a flared gas and beging e recorded at least and the Final Date rone-time avoide \$0 \$0	\$0 in maintaining once every 15 is the date of d costs) \$0 \$0
Other (as needed) Notes for DELAYED costs <b>Avoided Costs</b> Disposal Personnel nspection/Reporting/Sampling	records dem minutes. Th	onstrating that th ne Date Required	e net heating v is the effective	he reco alues fo date of compli tering 0.00 0.00	\$0 rds needed for the r the flared gas ar the revised permit ance. item (except for \$0 \$0 \$0 \$0	n/a flared gas and beg e recorded at least and the Final Date r one-time avoide \$0 \$0 \$0	\$0 in maintaining once every 15 is the date of d costs) \$0 \$0 \$0
Other (as needed) Notes for DELAYED costs <b>Avoided Costs</b> Disposal Personnel	records dem minutes. Th	onstrating that th ne Date Required	e net heating v is the effective	he reco alues fo date of compli 0.00 0.00 0.00 0.00	\$0 rds needed for the r the flared gas ar the revised permit ance. item (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0	n/a flared gas and beg e recorded at least and the Final Date r one-time avoider \$0 \$0 \$0 \$0 \$0	\$0 in maintaining once every 15 is the date of d costs) \$0 \$0 \$0 \$0 \$0
Other (as needed) Notes for DELAYED costs <b>Avoided Costs</b> Disposal Personnel nspection/Reporting/Sampling Supplies/Equipment	records dem minutes. Th	onstrating that th ne Date Required	e net heating v is the effective	he reco alues fo date of compli 0.00 0.00 0.00 0.00	\$0 rds needed for the r the flared gas ar the revised permit ance. item (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	n/a flared gas and beging e recorded at least of and the Final Date r one-time avoided \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	\$0 in maintaining once every 15 is the date of d costs) \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0
Other (as needed) Notes for DELAYED costs <b>Avoided Costs</b> Disposal Personnel nspection/Reporting/Sampling Supplies/Equipment Financial Assurance	records dem minutes. Th	onstrating that th ne Date Required	e net heating v is the effective	he reco alues fo date of compli 0.00 0.00 0.00 0.00	\$0 rds needed for the r the flared gas ar the revised permit ance. item (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0	n/a flared gas and beg e recorded at least and the Final Date r one-time avoider \$0 \$0 \$0 \$0 \$0	\$0 in maintaining once every 15 is the date of d costs) \$0 \$0 \$0 \$0 \$0
Other (as needed) Notes for DELAYED costs <b>Avoided Costs</b> Disposal Personnel nspection/Reporting/Sampling Supplies/Equipment Financial Assurance ONE-TIME avoided costs	records dem minutes. Th	onstrating that th ne Date Required	e net heating v is the effective	0.00 he reco alues fo date of compli 0.00 0.00 0.00 0.00 0.00	\$0 rds needed for the r the flared gas ar the revised permit ance. item (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	n/a flared gas and begiver e recorded at least and the Final Date souther final Date sout	\$0 in maintaining once every 15 is the date of d costs) \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0
Other (as needed) Notes for DELAYED costs <b>Avoided Costs</b> Disposal Personnel nspection/Reporting/Sampling Supplies/Equipment Financial Assurance ONE-TIME avoided costs	records dem minutes. Th	onstrating that th ne Date Required	e net heating v is the effective	0.00 he reco alues fo date of compli 0.00 0.00 0.00 0.00 0.00	\$0 rds needed for the r the flared gas ar the revised permit ance. item (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	n/a flared gas and begiver e recorded at least and the Final Date souther final Date sout	\$0 in maintaining once every 15 is the date of d costs) \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0

		ening Date			Do	cket No.	2020-1255-AIR-		PCW
		lespondent Case ID No.							Revision 4 (April 2014) Revision March 26, 2014
Reg.		erence No.						1001	2014
		Media							
		coordinator	Danielle Porras						
	Vien	Rule Cite(s)		Code \$\$ 116	5.115(b)(2)(E	(i) and (c	) and 122.143(4),	NSR Permit	
				Nos. 5.D and	20, FOP No.	01431, G	TC and STC No. 1		
				Healt	h & Safety C	ode § 382.	085(b)		
	Violatio	n Description					for the flares. Sp that the actual ex		
							very 15 minutes.		
		l							
							I	Base Penalty	\$25,000
>> Env	vironme	ntal, Proper	ty and Huma	n Health I	Matrix				
		Release	Major	Harm Moderate	Minor				
OR		Actual		liouerute					
		Potential					Percent 0.0	0%	
>>Pro	gramma	tic Matrix							
		Falsification	Major	Moderate	Minor		-		
					X		Percent 1.0	)%	
	Markais								
	Matrix Notes		Less th	an 30% of th	e rule require	ements we	re met.		
						Ad	justment	\$24,750	
									\$250
Violeti		h.a.							
violatio	on Event	[S							
		Number of V	/iolation Events	1		597	Number of violat	ion days	
			daily						
			weekly						
			monthly quarterly				Violation I	Base Penalty	\$250
			semiannual				VIOLACION	base renaity	φ230
			annual						
			single event	X					
			One single e	event is recom	nmended for	the incomp	olete record.		
Good F	aith Effo	orts to Com	ply	25.0% fore NOE/NOV	NOE/NOV to ED	PRP/Settlem	ont Offer	Reduction	\$62
			Extraordinary	ore NOL/NOV	NOL/NOV to ED	TRI/Settleme			
			Ordinary	х					
			N/A						
			Notes				ective measures o l August 28, 2020		
							Violat	tion Subtotal	\$188
Econor	nic Bene	efit (EB) for	this violation	n			Statutory Li	mit Test	
		Estimate	ed EB Amount		\$123		Violation Final F	Penalty Total	\$413
					Ψ±23				ψ,15
							Penalty (adjuste		\$413

Respondent Case ID No. S9801       S1 Group, Inc. S9801         Reg. Ent. Reference No. Notos for DELAYED costs       Percent Interest Depreciation       Vears of Depreciation         Delayed Costs       Eulipment Description       Item Cost       Date Required       Final Date       Yrs       Interest Saved       Costs Saved       EB Amount         Delayed Costs       Eulipment Description       Disposition       Statistical S		E	conomic	Benefit	Wo	r <b>ksheet</b>		
Reg. Ent. Reference No.       RN100218999 Media Air       Years of Depreciation         Violation No. 22       recent Interest Depreciation         Item Cost Date Required Final Date Yrs Interest Saved Costs Saved EB Amount         Item Description         Delayed Costs Euipment Buildings Othe (as needed)         Othe (as needed)         0.00       \$0         0.00       \$0         0.00       \$0         0.00       \$0         0.00       \$0         0.00       \$0         0.00       \$0         0.00       \$0         0.00       \$0         0.00       \$0         0.00       \$0         0.00       \$0         0.00       \$0         1       1.00.200         1       1.00.200         1       1.00.200         1       1.00.200         1       1.00.200         1       1.00.200         1       1.00.200         1       1.00.200         1       1.00.200         1       1.00.200         1       1.00.200         1       1.00.00         1       1.00.00	Respondent	SI Group, Inc.						
Media Air Violation No. 22       Vears of Depreciation         Item Cost Date Required Final Date       Yrs Interest Saved       Costs Saved       EB Amount         Item Description       Delayed Costs       Eguipment       0.00       \$0	Case ID No.	59891						
Media Air Violation No. 22       Vears of Depreciation         Item Cost Date Required Final Date       Yrs Interest Saved       Costs Saved       EB Amount         Item Description       Delayed Costs       Eguipment       0.00       \$0	Reg. Ent. Reference No.	RN100218999						
Violation No. 22     Percent interest Depreciation       Item Cost Date Required Final Date     Yrs Interest Saved     Depreciation       Delayed Costs     Equipment     0.00     \$0     \$0     \$0       Buildings     0.00     \$0     \$0     \$0     \$0       Other (as needed)     0.00     \$0     \$0     \$0     \$0       Record Keeping System     \$1,500     12-Nov-2018     1-Jul-2020     1.64     \$123     n/a       Remediation/Disposal     \$1,500     12-Nov-2018     1-Jul-2020     1.64     \$123     n/a       Permit Costs     \$1,500     12-Nov-2018     1-Jul-2020     1.64     \$123     n/a       Record Keeping System     \$1,500     12-Nov-2018     1-Jul-2020     1.64     \$123     n/a       Record Keeping System     \$1,500     12-Nov-2018     1-Jul-2020     1.64     \$123     n/a       Record Keeping System     \$1,500     12-Nov-2018     1-Jul-2020     1.64     \$123     n/a       Notes for DELAYED costs     Estimated cost to implement procedures for the records needed for the flares and begin maintaining records demonstrating that the actual exit velocity for the flares is recorded at least once every 15 minutes. The Date Required is the effective date of the revised permit and the Final Date is the date of compliance.       Disposal     0.00								Years of
Item Cost       Date Required       Final Date       Yrs       Interest Saved       Costs       EB Amount         Item Description       Delayed       Costs       Saved       EB Amount         Delayed       Delayed       0.00       \$0       \$0       \$0       \$0         Sequipment       Buildings       0.00       \$0							Percent Interest	
Item Cost       Date Required       Final Date       Yrs       Interest Saved       Costs Saved       EB Amount         Item Description	violation ito.						FO	-
Item Description         Delayed Costs         Equipment Buildings         String/Sended         Engineering/Construction         Record Keeping System Training/Sampling         Remediation/Disposal Permit Costs         Other (as needed)         Differ (as needed)         Differ (as needed)         Disposal Personnel         Disposal Personnel         Notes for DELAYED costs         Disposal Personnel         Disposal Personnel<								-
Defaued Costs         Equipment Buildings         Other (as needed)         Engineering/Construction Land         Record Keeping System Training/Sampling         Remediation/Disposal Permit Costs         Other (as needed)         Disposal Personnel         Disposal Personnel         Personnel         Disposal Personnel         Disposal Personnel         Disposal Disposal Disposal Detrimediation/Disposal Personnel         Notes for AVOIDED costs			Date Required	Final Date	Yrs	Interest Saved	Costs Saved	EB Amount
Equipment Buildings         0.00         \$0         \$0         \$0         \$0           Other (as needed)         0.00         \$0         \$0         \$0         \$0         \$0           Engineering/Construction Land         0.00         \$0         \$0         \$0         \$0         \$0           Record Keeping System Training/Sampling Remediation/Disposal         0.00         \$0         n/a         \$123           Permit Costs         0.00         \$0         n/a         \$123           Other (as needed)         0.00         \$0         n/a         \$123           Permit Costs         0.00         \$0         n/a         \$0           Other (as needed)         0.00         \$0         n/a         \$0           Notes for DELAYED costs         Estimated cost to implement procedures for the records needed for the flares is recorded at least once every 15         minutes. The Date Required is the effective date of the revised permit and the Final Date is the date of compliance.           Avoided Costs         ANNUALIZE avoided costs before entering item (except for one-time avoided costs)         \$0           Supplies/Equipment         0.00         \$0         \$0         \$0           Inspection/Reporting/Sampling         0.00         \$0         \$0         \$0         \$0	Item Description	1						
Equipment Buildings         0.00         \$0         \$0         \$0         \$0           Other (as needed)         0.00         \$0         \$0         \$0         \$0         \$0           Engineering/Construction Land         0.00         \$0         \$0         \$0         \$0         \$0           Record Keeping System Training/Sampling Remediation/Disposal         0.00         \$0         n/a         \$123           Permit Costs         0.00         \$0         n/a         \$123           Other (as needed)         0.00         \$0         n/a         \$123           Permit Costs         0.00         \$0         n/a         \$0           Other (as needed)         0.00         \$0         n/a         \$0           Notes for DELAYED costs         Estimated cost to implement procedures for the records needed for the flares is recorded at least once every 15         minutes. The Date Required is the effective date of the revised permit and the Final Date is the date of compliance.           Avoided Costs         ANNUALIZE avoided costs before entering item (except for one-time avoided costs)         \$0           Supplies/Equipment         0.00         \$0         \$0         \$0           Inspection/Reporting/Sampling         0.00         \$0         \$0         \$0         \$0								
Buildings       0.00       \$0       \$0       \$0         Engineering/Construction Land       0.00       \$0       \$0       \$0         Record Keeping System Training/Sampling       11.500       12-Nov-2018       1-Jul-2020       1.64       \$12.3       n/a       \$10         Remediation/Disposal       0.00       \$0       \$0       \$0       \$0       \$0       \$0         Notes for DELAYED costs       Estimated cost to implement procedures for the records needed for the flares and begin maintaining records demonstrating that the actual exit velocity for the flares is recorded at least once every 15 minutes. The Date Required is the effective date of the revised permit and the Final Date is the date of compliance.         Notes for DELAYED costs       ANUALIZE avoided costs before entering item (except for one-time avoided costs)         Personnel       0.00       \$0       \$0         Inspection /Reporting /Sampling Supplies/Equipment       0.00       \$0       \$0         Notes for AVOIDED costs       Notes for AVOIDED costs       0.00       \$0       \$0								
Other (as needed)       Image: I								
Engineering/Construction Land       0.00       \$0       \$0       \$0         Record Keeping System Training/Sampling Remediation/Disposal       1.00       \$0       n/a       \$123         Permit Costs       0.00       \$0       n/a       \$0         Other (as needed)       0.00       \$0       n/a       \$0         Notes for DELAYED costs       Estimated cost to implement procedures for the records needed for the flares and begin maintaining records demonstrating that the actual exit velocity for the flares is recorded at least once every 15 minutes. The Date Required is the effective date of the revised permit and the Final Date is the date of compliance.         Avoided Costs       ANNUALIZE avoided costs before entering item (except for one-time avoided costs)         Pisposal Personnel Financial Assurance ONE-TIME avoided costs       0.00       \$0       \$0         Notes for AVOIDED costs       0.00       \$0       \$0       \$0         Notes for AVOIDED costs       0.00       \$0       \$0       \$0								
Land       0.00       \$0       n/a       \$0         Record Keeping System       \$1,500       12-Nov-2018       1-Jul-2020       1.64       \$123       n/a       \$10         Remediation/Disposal       0.00       \$0       n/a       \$0       \$0       n/a       \$0         Permit Costs       0.00       \$0       n/a       \$0       \$0       n/a       \$0         Notes for DELAYED costs       Estimated cost to implement procedures for the records needed for the flares and begin maintaining records demonstrating that the actual exit velocity for the flares is recorded at least once every 15 minutes. The Date Required is the effective date of the revised permit and the Final Date is the date of compliance.         Avoided Costs       ANNUALIZE avoided costs before entering item (except for one-time avoided costs)         Disposal Personnel       0.00       \$0       \$0       \$0         Financial Assurance       0.00       \$0       \$0       \$0       \$0         Notes for AVOIDED costs       Inancia Assurance       0.00       \$0       \$0       \$0         Notes for AVOIDED costs       Inancia Assurance       0.00       \$0       \$0       \$0       \$0								
Record Keeping System Training/Sampling       \$1,500       12-Nov-2018       1-Jul-2020       1.64       \$123       n/a       \$123         Remediation/Disposal       0.00       \$0       n/a       \$0         Permit Costs       0.00       \$0       n/a       \$0         Other (as needed)       0.00       \$0       n/a       \$0         Notes for DELAYED costs       Estimated cost to implement procedures for the records needed for the flares and begin maintaining records demonstrating that the actual exit velocity for the flares is recorded at least once every 15 minutes. The Date Required is the effective date of the revised permit and the Final Date is the date of compliance.         Avoided Costs       ANNUALIZE avoided costs before entering item (except for one-time avoided costs)         Personnel       0.00       \$0       \$0         Inspection/Reporting/Sampling       0.00       \$0       \$0         ONE-TIME avoided costs       0.00       \$0       \$0         Other (as needed)       0.00       \$0       \$0         Notes for AVOIDED costs       0.00       \$0       \$0								
Training/Sampling       0.00       \$0       n/a       \$0         Remediation/Disposal       0.00       \$0       n/a       \$0         Permit Costs       0.00       \$0       n/a       \$0         Notes for DELAYED costs       Estimated cost to implement procedures for the records needed for the flares and begin maintaining records demonstrating that the actual exit velocity for the flares is recorded at least once every 15 minutes. The Date Required is the effective date of the revised permit and the Final Date is the date of compliance.         Avoided Costs       ANNUALIZE avoided costs before entering item (except for one-time avoided costs)         Disposal       0.00       \$0       \$0         Personnel       0.00       \$0       \$0         Supplies/Equipment       0.00       \$0       \$0         Financial Assurance       0.00       \$0       \$0         ONE for AVOIDED costs       Notes for AVOIDED costs       0.00       \$0       \$0		±1 500	12 Nov 2010	1 1 2020				
Remediation/Disposal Permit Costs       0.00       \$0       n/a       \$0         Other (as needed)       0.00       \$0       n/a       \$0         Notes for DELAYED costs       Estimated cost to implement procedures for the records needed for the flares and begin maintaining records demonstrating that the actual exit velocity for the flares is recorded at least once every 15 minutes. The Date Required is the effective date of the revised permit and the Final Date is the date of compliance.         Avoided Costs       ANNUALIZE avoided costs before entering item (except for one-time avoided costs)         Disposal Personnel       0.00       \$0       \$0         Supplies/Equipment Financial Assurance ONE-TIME avoided costs       0.00       \$0       \$0       \$0         Notes for AVOIDED costs       Notes for AVOIDED costs       0.00       \$0       \$0       \$0		\$1,500	12-NOV-2018	1-Jui-2020				
Permit Costs Other (as needed)       0.00       \$0       n/a       \$0         Notes for DELAYED costs       Estimated cost to implement procedures for the records needed for the flares and begin maintaining records demonstrating that the actual exit velocity for the flares is recorded at least once every 15 minutes. The Date Required is the effective date of the revised permit and the Final Date is the date of compliance.         Avoided Costs       ANNUALIZE avoided costs before entering item (except for one-time avoided costs)         Disposal Personnel       0.00       \$0       \$0         Supplies/Equipment Financial Assurance ONE-TIME avoided costs       0.00       \$0       \$0         Notes for AVOIDED costs       0.00       \$0       \$0       \$0								
Other (as needed)       0.00       \$0       n/a       \$0         Notes for DELAYED costs       Estimated cost to implement procedures for the records needed for the flares and begin maintaining records demonstrating that the actual exit velocity for the flares is recorded at least once every 15 minutes. The Date Required is the effective date of the revised permit and the Final Date is the date of compliance.         Avoided Costs       ANNUALIZE avoided costs before entering item (except for one-time avoided costs)         Disposal Personnel Inspection/Reporting/Sampling Supplies/Equipment Financial Assurance       0.00       \$0       \$0         ONE-TIME avoided costs       0.00       \$0       \$0       \$0       \$0         Notes for AVOIDED costs       Image: Supple costs       0.00       \$0       \$0       \$0								
Notes for DELAYED costs       Estimated cost to implement procedures for the records needed for the flares is recorded at least once every 15 minutes. The Date Required is the effective date of the revised permit and the Final Date is the date of compliance.         Avoided Costs       ANNUALIZE avoided costs before entering item (except for one-time avoided costs)         Disposal Personnel       0.00       \$0       \$0       \$0         Supplies/Equipment Financial Assurance       0.00       \$0       \$0       \$0       \$0         ONE-TIME avoided costs       0.00       \$0       \$0       \$0       \$0       \$0         Notes for AVOIDED costs       Notes for AVOIDED costs       Image: context c		-						
Notes for DELAYED costs       records demonstrating that the actual exit velocity for the flares is recorded at least once every 15 minutes. The Date Required is the effective date of the revised permit and the Final Date is the date of compliance.         Avoided Costs       ANNUALIZE avoided costs before entering item (except for one-time avoided costs)         Disposal Personnel       0.00       \$0       \$0         Supplies/Equipment Financial Assurance ONE-TIME avoided costs       0.00       \$0       \$0       \$0         Other (as needed)       0.00       \$0       \$0       \$0       \$0       \$0         Notes for AVOIDED costs       Image: Cost of the flares is recorded at least once every 15       Cost of the revised permit and the Final Date is the date of compliance.			JII		0.00	<u> </u>		<u> </u>
Notes for DELAYED costs       minutes. The Date Required is the effective date of the revised permit and the Final Date is the date of compliance.         Avoided Costs       ANNUALIZE avoided costs before entering item (except for one-time avoided costs)         Disposal       0.00       \$0       \$0       \$0         Personnel       0.00       \$0		Estimated	cost to implement	procedures fo	r the re	cords needed for t	he flares and begin	maintaining
Avoided Costs       ANNUALIZE avoided costs before entering item (except for one-time avoided costs)         Disposal Personnel       0.00       \$0       \$0         Inspection/Reporting/Sampling Supplies/Equipment Financial Assurance       0.00       \$0       \$0         ONE-TIME avoided costs       0.00       \$0       \$0       \$0         Other (as needed)       0.00       \$0       \$0       \$0         Notes for AVOIDED costs       0.00       \$0       \$0       \$0		records de	emonstrating that	the actual exit	velocity	for the flares is r	ecorded at least onc	e every 15
Avoided Costs       ANNUALIZE avoided costs before entering item (except for one-time avoided costs)         Disposal Personnel       0.00       \$0       \$0         Inspection/Reporting/Sampling Supplies/Equipment Financial Assurance ONE-TIME avoided costs       0.00       \$0       \$0         ONE-TIME avoided costs       0.00       \$0       \$0       \$0         Notes for AVOIDED costs       0.00       \$0       \$0       \$0	Notes for DELATED costs	minutes. Th	ne Date Required i	s the effective	date of	the revised permit	and the Final Date	is the date of
Disposal Personnel         0.00         \$0         \$0         \$0           Inspection/Reporting/Sampling Supplies/Equipment Financial Assurance         0.00         \$0         \$0         \$0         \$0           ONE-TIME avoided costs Other (as needed)         0.00         \$0         \$0         \$0         \$0           Notes for AVOIDED costs         0.00         \$0         \$0         \$0         \$0					compli	ance.		
Disposal Personnel         0.00         \$0         \$0         \$0           Inspection/Reporting/Sampling Supplies/Equipment Financial Assurance ONE-TIME avoided costs Other (as needed)         0.00         \$0         \$0         \$0           Notes for AVOIDED costs         0.00         \$0         \$0         \$0         \$0								
Personnel         0.00         \$0         \$0           Inspection/Reporting/Sampling         0.00         \$0         \$0         \$0           Supplies/Equipment         0.00         \$0         \$0         \$0         \$0           Financial Assurance         0.00         \$0         \$0         \$0         \$0         \$0           ONE-TIME avoided costs         0.00         \$0         \$0         \$0         \$0         \$0           Other (as needed)         0.00         \$0         \$0         \$0         \$0         \$0	Avoided Costs	ANNUA	ALIZE avoided co	osts before er		<u> </u>	one-time avoide	
Inspection/Reporting/Sampling         0.00         \$0         \$0         \$0           Supplies/Equipment         Financial Assurance         0.00         \$0         \$0         \$0           ONE-TIME avoided costs         0.00         \$0         \$0         \$0         \$0           Other (as needed)         0.00         \$0         \$0         \$0         \$0								
Supplies/Equipment Financial Assurance ONE-TIME avoided costs Other (as needed)         0.00         \$0         \$0         \$0           Notes for AVOIDED costs         0.00         \$0								
Financial Assurance       0.00       \$0       \$0       \$0         ONE-TIME avoided costs       0.00       \$0       \$0       \$0         Other (as needed)       0.00       \$0       \$0       \$0         Notes for AVOIDED costs       0.00       0.00       \$0       \$0								
ONE-TIME avoided costs       0.00       \$0       \$0         Other (as needed)       0.00       \$0       \$0       \$0         Notes for AVOIDED costs       0.00       0.00       \$0       \$0	,							
Other (as needed)       Other (as needed)     0.00     \$0     \$0       Notes for AVOIDED costs								
Notes for AVOIDED costs								
	Other (as needed)		<u> </u>		0.00	<u> </u>	<u>\$</u> 0	<u> </u>
Approx. Cost of Compliance \$1,500 TOTAL \$123	Notes for AVOIDED costs							
Approx. Cost of Compliance         \$1,500         TOTAL         \$123								
Approx. Cost of Compliance \$1,500 TOTAL \$123								
Approx. Cost of Compliance         \$1,500         TOTAL         \$123							-	
	Approx. Cost of Compliance		\$1,500			TOTAL		\$123

	Scree	ning Date	22-Sep-2020		Do	cket No. 2020-1255-AIR-E		PCW
		•	SI Group, Inc.					Revision 4 (April 2014)
Dea		ise ID No.	59891 RN100218999				PCW I	Revision March 26, 2014
Reg.	LIII. Kere	Media						
	Enf. Co	ordinator	Danielle Porras					
		ion Number						1
	l	Rule Cite(s)	30 Tex. A			113.1090, and 122.143(4), 4		
			63.6655(e), F	OP No. 01431		C No. 1.A, and Tex. Health &	Safety Code	
					g 562.	085(b)		
			Failed to maint	ain records of	the mainten	ance for a stationary reciproca	ting internal	
	Violation	Description	combustion en	gine ("RICE").	Specifically,	the Respondent did not main		
			c	of the mainten	ance conduct	ed on each stationary RICE.		
						В	ase Penalty	\$25,000
>> Env	vironmen	tal, Proper	ty and Hum	an Health	Matrix			
				Harm				
OR		<b>Release</b> Actual	Major	Moderate	Minor			
•		Potential				Percent 0.0	%	
>>Pro	grammati	Falsification	Major	Moderate	Minor			
			x			Percent 15.0	%	
								1
	Matrix		10	0% of the rule	e requiremen	ts are not met.		
	Notes		10		e requirement			
							+21 250	<b>.</b> 1
						Adjustment	\$21,250	]
								\$3,750
Violatio	on Events	;						
		Number of )	Vieletien Evente		I 17	244 Number of violeti		
		Number of V	/iolation Events	1	l L	244 Number of violation	on days	
			daily					
			weekly					
			monthly quarterly			Violation B	ase Penalty	\$3,750
			semiannual			Violation D	use r churty	\$3,750
			annual					
			single event	Х				
			One sing	le event is rec	ommended fo	or the missing record.		
	Ļ							4
Good F	aith Effor	ts to Com		25.0%		NDD (Cathland orth Office	Reduction	\$937
			B Extraordinary	efore NOE/NOV	NOE/NOV to EL	PRP/Settlement Offer		
			Ordinary	x				
			N/A				_	
			N	The Respon	dent complet	ed the corrective measures or		
			Notes	July 20, 202	0, prior to th	e NOE dated August 28, 2020		
			l					
						Violati	on Subtotal	\$2,813
Econor	mic Benef	it (EB) for	this violation	on		Statutory Lin	nit Test	
		Estimate	ed EB Amount		\$50	Violation Final P	enalty Total	\$6,188
							-	
				i nis vio	ation Final	Assessed Penalty (adjuste	a ror limits)	\$6,188

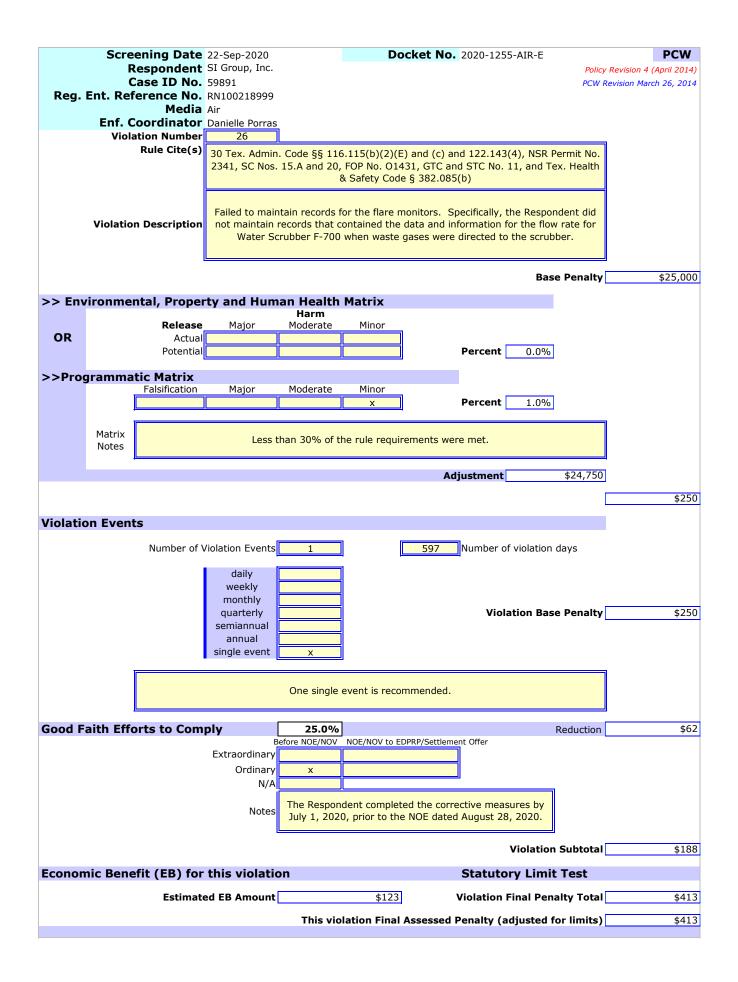
	E	conomic	Benefit	Wo	rksheet		
Respondent	SI Group, Inc.						
Case ID No.	59891						
Reg. Ent. Reference No.	RN100218999						
Media							Years of
Violation No.						Percent Interest	Depreciation
	20					5.0	15
	Itom Cost	Date Required	Final Date	Yrs	Interest Saved	Costs Saved	EB Amount
Them Description	Item cost	Date Required	Final Date	115	Interest Saveu	COSIS Saveu	LB Amount
Item Description							
Delayed Costs		1		1			1.5
Equipment				0.00	\$0	\$0	\$0
Buildings				0.00	\$0	\$0	\$0
Other (as needed)				0.00	\$0	\$0	\$0
Engineering/Construction				0.00	\$0	\$0	\$0
Land	±1 500	10.01.0010	20.1.1.2020	0.00	\$0	n/a	\$0
Record Keeping System	\$1,500	19-Nov-2019	20-Jul-2020	0.67	\$50	n/a	\$50
Training/Sampling				0.00	\$0	n/a	\$0
Remediation/Disposal				0.00	\$0	n/a	\$0
Permit Costs				0.00	\$0	n/a	\$0
Other (as needed)				0.00	\$0	n/a	\$0
Notes for DELAYED costs	The	Date Required is t	the investigation	n date a	nd the Final Date	onducted on each st is the date of compl	iance.
Avoided Costs	ANNUA	ALIZE avoided c	osts before er			one-time avoide	-
Disposal				0.00	\$0	\$0	\$0
Personnel				0.00	\$0	\$0	\$0
Inspection/Reporting/Sampling				0.00	\$0	\$0	\$0
Supplies/Equipment				0.00	\$0	\$0	\$0
Financial Assurance				0.00	\$0	\$0	\$0
ONE-TIME avoided costs				0.00	\$0 \$0	<u>\$0</u> \$0	<u>\$0</u> \$0
Other (as needed)				0.00	\$0	\$0	\$0
Notes for AVOIDED costs							
Approx. Cost of Compliance		\$1,500			TOTAL		\$50



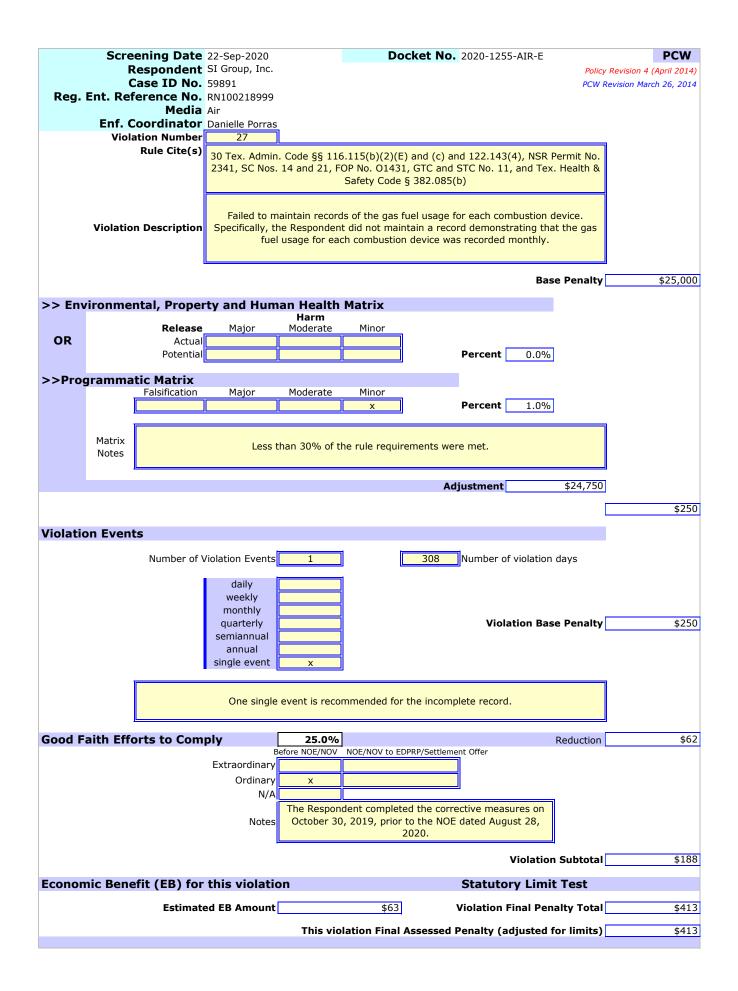
	E	conomic	Benefit	Wo	rksheet		
Respondent Case ID No. Reg. Ent. Reference No.	59891						
Media Violation No.						Percent Interest	Years of Depreciation
						5.0	15
	Item Cost	<b>Date Required</b>	Final Date	Yrs	Interest Saved	Costs Saved	EB Amount
Item Description							
Delayed Costs	;			_			
Equipment				0.00	\$0	\$0	\$0
Buildings				0.00	\$0	\$0	\$0
Other (as needed)				0.00	\$0	\$0	\$0
Engineering/Construction				0.00	\$0	\$0	\$0
Land				0.00	\$0	n/a	\$0
Record Keeping System	\$1,500	19-Nov-2019	30-Jun-2020	0.61	\$46	n/a	\$46
Training/Sampling				0.00	\$0	n/a	\$0
Remediation/Disposal				0.00	\$0	n/a	\$0
Permit Costs				0.00	\$0	n/a	\$0
Other (as needed)				0.00	\$0	n/a	\$0
Notes for DELAYED costs	5				vestigation date a	that is recorded thro nd the Final Date is	5
Avoided Costs	ANNU/	VIITZE avoided c	acts before an				
		ALIZE UVOIDCU C	USIS DEIDIE EI	tering	item (except for	one-time avoide	d costs)
Disposal				0.00	\$0	\$0	\$0
Personnel				0.00	\$0 \$0	\$0 \$0	\$0 \$0
Personnel				0.00 0.00 0.00	\$0 \$0 \$0	\$0 \$0 \$0	\$0 \$0 \$0
Personnel				0.00 0.00 0.00 0.00	\$0 \$0	\$0 \$0 \$0 \$0	\$0 \$0 \$0 \$0 \$0
Personnel Inspection/Reporting/Sampling				0.00 0.00 0.00 0.00 0.00	\$0 \$0 \$0 \$0 \$0 \$0	\$0 \$0 \$0 \$0 \$0 \$0	\$0 \$0 \$0 \$0 \$0 \$0
Personnel Inspection/Reporting/Sampling Supplies/Equipment				0.00 0.00 0.00 0.00 0.00 0.00	\$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	\$0 \$0 \$0 \$0 \$0 \$0 \$0	\$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0
Personnel Inspection/Reporting/Sampling Supplies/Equipment Financial Assurance				0.00 0.00 0.00 0.00 0.00	\$0 \$0 \$0 \$0 \$0 \$0	\$0 \$0 \$0 \$0 \$0 \$0	\$0 \$0 \$0 \$0 \$0 \$0
Personnel Inspection/Reporting/Sampling Supplies/Equipment Financial Assurance ONE-TIME avoided costs				0.00 0.00 0.00 0.00 0.00 0.00	\$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	\$0 \$0 \$0 \$0 \$0 \$0 \$0	\$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0

		ening Date			Dock	et No. 2020-1255	5-AIR-E	PCW
			SI Group, Inc.				Polic	y Revision 4 (April 2014)
_		Case ID No.					PCW	Revision March 26, 2014
Reg.	Ent. Re		RN100218999					
	Enf (	Media		_				
		ation Number	Danielle Porras	5				
	¥101	Rule Cite(s)		<u> </u>				7
		Rule elle(3)	SU TEX. AUI				3(4), NSR Permit No. 11, and Tex. Health &	
			2341, SC NO	5. 4.L anu 21	Safety Code §		II, and Tex. Health &	
						, 5521666 (5)		
						-	nks. Specifically, the	
							rom all storage tanks	
							12-month period that ank capacity in gallons,	
	Violatio	n Description					thly average and the	
			maximum te	emperatures in	n degrees Fahren	heit, VOC vapor pre	essure at the monthly	
			average mate	rial temperatu			he previous month and	
					year-to	-date.		
							Base Penalty	\$25,000
>> Env	vironme	ntal, Prope	rty and Hun	nan Health	Matrix			
				Harm				
OR		Release Actual		Moderate	Minor			
UK		Potential				Percent	0.0%	
		rotentia	<u></u>		<u>I</u> I	rereent	0.070	
>>Pro	gramma	tic Matrix						
		Falsification	Major	Moderate	Minor	_		
					X	Percent	1.0%	
	Matrix							7
	Notes		Les	s than 30% of	f the rule require	ments were met.		
								<u>–1</u>
								_
						Adjustme	ent \$24,750	0
						Adjustme	ent \$24,750	
	_	-				Adjustme	ent \$24,750	
Violati	on Even	ts				Adjustme	ent \$24,750	
Violati	on Even		Violation Events	1	1		nt \$24,750	
Violati	on Even		Violation Events	1				
Violati	on Even		daily	1	]			
Violati	on Even		daily weekly	1				
Violati	on Even		daily weekly monthly	1		440 Number of	violation days	\$250
Violati	on Even		daily weekly monthly quarterly			440 Number of		\$250
Violatio	on Even		daily weekly monthly			440 Number of	violation days	\$250
Violati	on Even		daily weekly monthly quarterly semiannual	1 		440 Number of	violation days	\$250
Violati	on Even		daily weekly monthly quarterly semiannual annual			440 Number of	violation days	\$250
Violati	on Even		daily weekly monthly quarterly semiannual annual single event		commended for t	440 Number of	violation days	\$250
Violati	on Even		daily weekly monthly quarterly semiannual annual single event		commended for t	440 Number of	violation days	\$250
		Number of	daily weekly monthly quarterly semiannual annual single event		commended for t	440 Number of	violation days	\$250 \$250
			daily weekly monthly quarterly semiannual annual single event One sing	gle event is re 25.0%	commended for t	440 Number of	violation days <b>Violation Base Penalty</b> rd.	\$250 \$250
		Number of	daily weekly monthly quarterly semiannual annual single event One sing	gle event is re	]	440 Number of	violation days <b>Violation Base Penalty</b> rd.	\$250 \$250
		Number of	daily weekly monthly quarterly semiannual annual single event One sing ply Extraordinary Ordinary	gle event is re	]	440 Number of	violation days <b>Violation Base Penalty</b> rd.	\$250 \$250
		Number of	daily weekly monthly quarterly semiannual annual single event One sing	gle event is re	]	440 Number of	violation days <b>Violation Base Penalty</b> rd.	\$250 \$250
		Number of	daily weekly monthly quarterly semiannual annual single event One sing Extraordinary Ordinary N/A	gle event is re	NOE/NOV to EDPRI	440 Number of the incomplete recor	violation days Violation Base Penalty rd. Reduction	\$250 \$250
		Number of	daily weekly monthly quarterly semiannual annual single event One sing ply Extraordinary Ordinary	gle event is re	NOE/NOV to EDPRI	440 Number of the incomplete recor	violation days Violation Base Penalty rd. Reduction	\$250 \$250
		Number of	daily weekly monthly quarterly semiannual annual single event One sing Extraordinary Ordinary N/A	gle event is re	NOE/NOV to EDPRI	440 Number of the incomplete recor	violation days Violation Base Penalty rd. Reduction	\$250 ;\$250
		Number of	daily weekly monthly quarterly semiannual annual single event One sing Extraordinary Ordinary N/A	gle event is re	NOE/NOV to EDPRI	440 Number of the incomplete recor	violation days Violation Base Penalty rd. Reduction	\$250 ;\$250
Good F	aith Eff	Number of V	daily weekly monthly quarterly semiannual annual single event One sing Extraordinary Ordinary N/A	gle event is re 25.0% Before NOE/NOV x The Respond 10, 202	NOE/NOV to EDPRI	440 Number of 440 Number of v the incomplete record P/Settlement Offer he corrective measured OE dated August 28	violation days Violation Base Penalty rd. Reduction	\$250 ;\$250
Good F	aith Eff	Number of V orts to Com	daily weekly monthly quarterly semiannual annual single event One sing Extraordinary Ordinary N/A Notes	gle event is re	NOE/NOV to EDPRI	440 Number of 440 Number of V the incomplete record P/Settlement Offer P/Settlement Offer he corrective measure OE dated August 28 Statuto	rd. Reduction tiolation Base Penalty rd. Reduction Violation Subtotal ry Limit Test	\$250 \$250 \$250 \$250
Good F	aith Eff	Number of V orts to Com	daily weekly monthly quarterly semiannual annual single event One sing Extraordinary Ordinary N/A Notes	gle event is re	NOE/NOV to EDPRI	440 Number of 440 Number of V the incomplete record P/Settlement Offer P/Settlement Offer he corrective measure OE dated August 28 Statuto	rd. Reduction Jure on March 2020. Violation Subtotal	\$250 \$250 \$250 \$250
Good F	aith Eff	Number of V orts to Com	daily weekly monthly quarterly semiannual annual single event One sing Extraordinary Ordinary N/A Notes	gle event is re	NOE/NOV to EDPRI	440 Number of V the incomplete record P/Settlement Offer be corrective measu OE dated August 28 Statuto Violatio	rd. Reduction tiolation Base Penalty rd. Reduction Violation Subtotal ry Limit Test	\$250 \$250 \$250 \$62 \$62 \$188

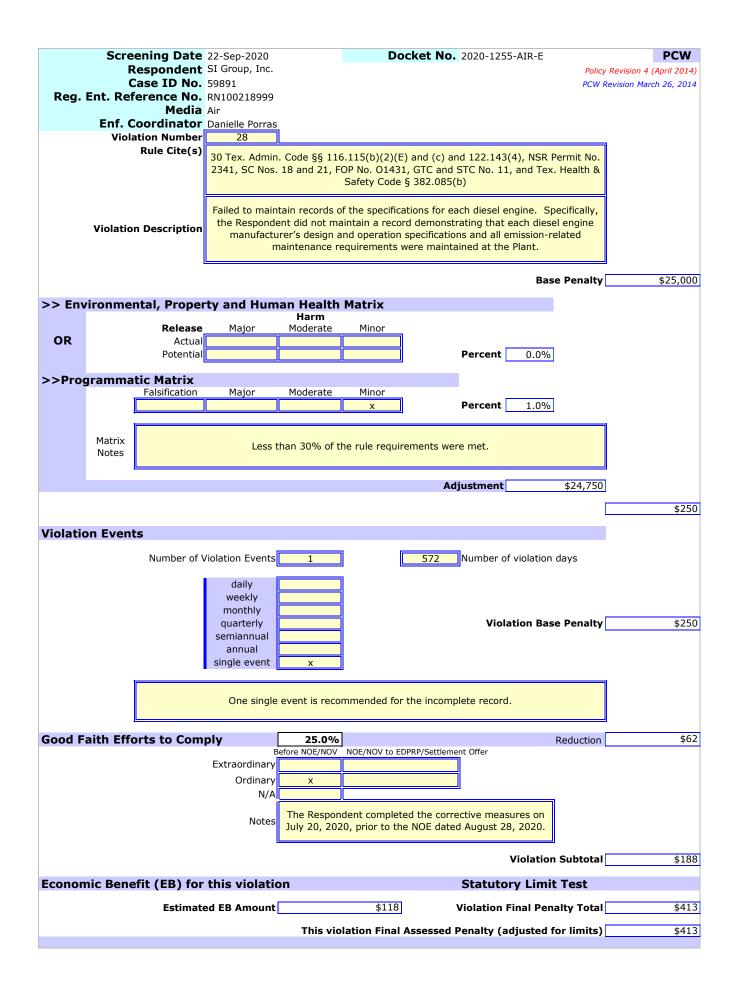
	E	conomic	Benefit	Wo	rksheet		
Respondent	SI Group, Inc.						
Case ID No.	59891						
Reg. Ent. Reference No.	RN100218999						
Media	Air					Percent Interest	Years of
Violation No.	25					r creent interest	Depreciation
						5.0	15
	Item Cost	<b>Date Required</b>	Final Date	Yrs	Interest Saved	Costs Saved	EB Amount
Item Description							
Delayed Costs				_			
Equipment				0.00	\$0	\$0	\$0
Buildings				0.00	\$0	\$0	\$0
Other (as needed)				0.00	\$0	\$0	\$0
Engineering/Construction Land				0.00	\$0 \$0	\$0 n/a	\$0 \$0
Record Keeping System	\$1,500	26-Dec-2018	10-Mar-2020	1.21	\$90	n/a	\$90
Training/Sampling	<u></u>		10 1101 2020	0.00	\$0	n/a	\$0
Remediation/Disposal				0.00	\$0	n/a	\$0
Permit Costs				0.00	\$0	n/a	\$0
Other (as needed)				0.00	\$0	n/a	\$0
Notes for DELAYED costs	VOC emiss storage tai Required	sions from all stor nks that includes is the effective da	age tanks and b the data and inf ate of the specia	egan n ormatio I condit	naintaining records on as specified in N ion and the Final I	the monthly and rol for the VOC emissi NSR Permit No. 234: Date is the date of c	ons from all L. The Date ompliance.
Avoided Costs Disposal	ANNO		osts before en	0.00	\$0	\$0	\$0
Personnel				0.00	\$0	\$0	\$0
Inspection/Reporting/Sampling				0.00	\$0	\$0	\$0
Supplies/Equipment				0.00	\$0	\$0	\$0
Financial Assurance				0.00	\$0	\$0	\$0
ONE-TIME avoided costs				0.00	\$0	\$0	\$0
Other (as needed)				0.00	\$0	\$0	\$0
Notes for AVOIDED costs							
Approx. Cost of Compliance		\$1,500			TOTAL		\$90



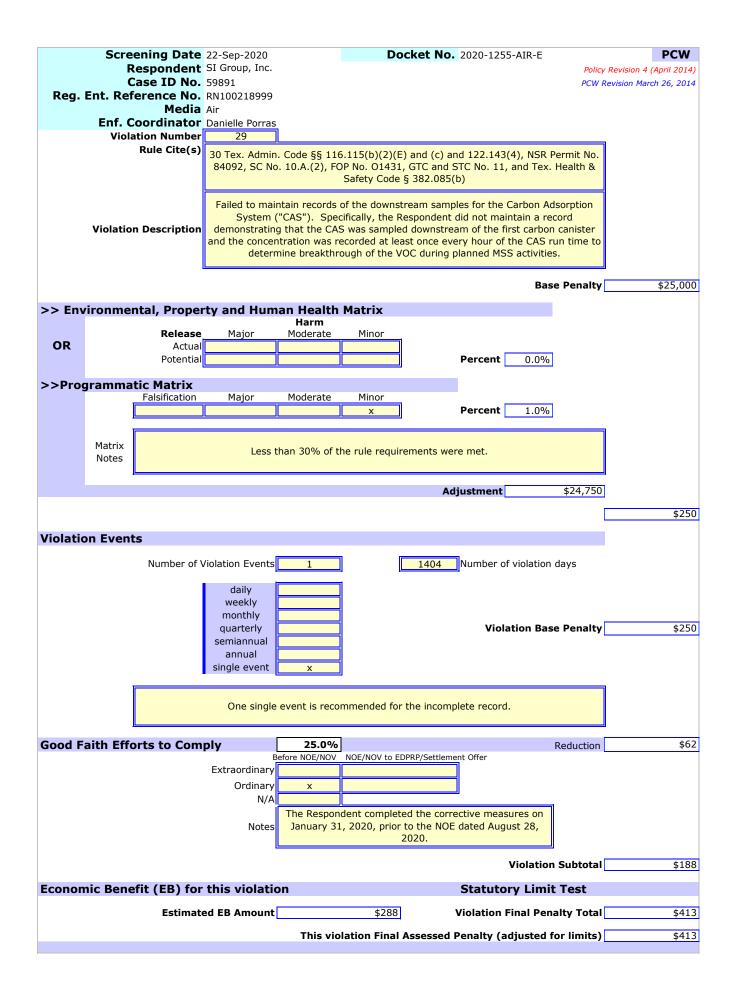
	E	conomic	Benefit	Wo	rksheet		
Respondent Case ID No. Reg. Ent. Reference No.	59891						
Media Violation No.	Air					Percent Interest	Years of Depreciation
						5.0	15
	Item Cost	Date Required	Final Date	Yrs	Interest Saved	Costs Saved	EB Amount
Item Description							
Delayed Costs	·			-			
Equipment				0.00	\$0	\$0	\$0
Buildings				0.00	\$0	\$0	\$0
Other (as needed)				0.00	\$0	\$0	\$0
Engineering/Construction				0.00	\$0	\$0	\$0
Land Record Keeping System	\$1,500	12-Nov-2018	1-Jul-2020	0.00	\$0 \$123	n/a n/a	\$0 \$123
Training/Sampling	\$1,500	12-1000-2016	1-Jui-2020	0.00	\$125	n/a	\$125
Remediation/Disposal		1		0.00	\$0	n/a	\$0
Permit Costs				0.00	\$0	n/a	\$0
Other (as needed)				0.00	\$0	n/a	\$0
Notes for DELAYED costs	700 when wa	aste gases are dir	ected to the sci	ubber i	n order to demons the revised permi	he flow rate for Wat trate compliance wi t and the Final Date	th NSR Permit
Avoided Costs	ANNU	ALIZE avoided c	osts before ei	ntering	item (except for	r one-time avoide	d costs)
Disposal				0.00	\$0	\$0	\$0
Personnel				0.00	\$0	\$0	\$0
Inspection/Reporting/Sampling				0.00	\$0	\$0	\$0
Supplies/Equipment				0.00	\$0	\$0	\$0
Financial Assurance ONE-TIME avoided costs				0.00	\$0 \$0	\$0 \$0	\$0 \$0
Other (as needed)				0.00	\$0	\$0	\$0 \$0
other (as needed)		<u></u> 1		0.00			U 40
Notes for AVOIDED costs							



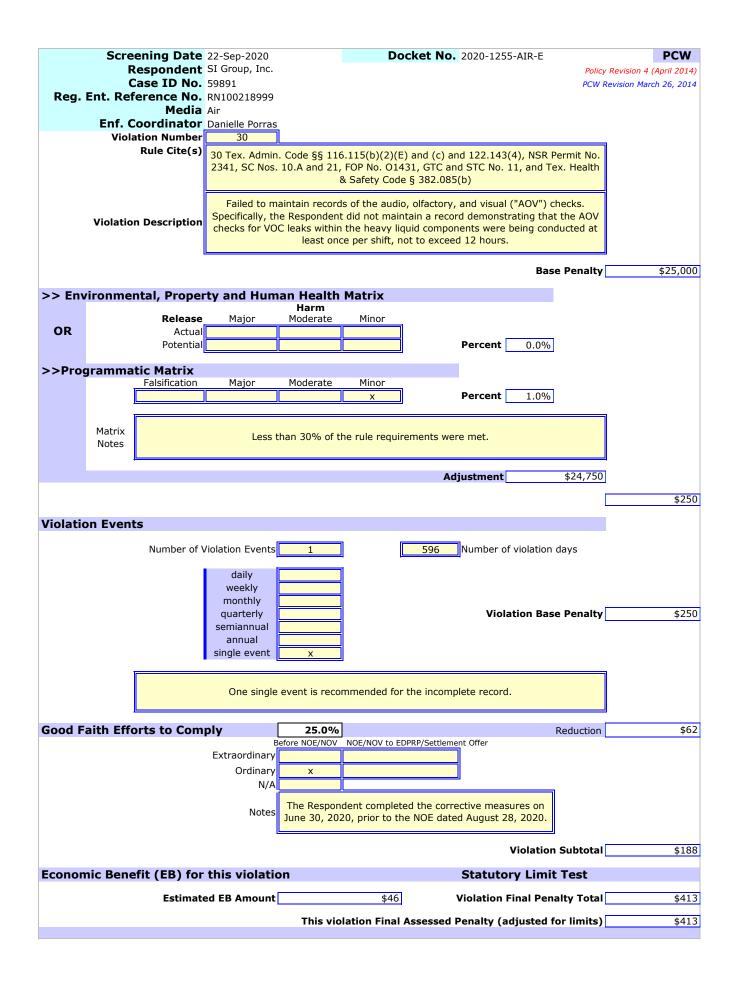
	E	conomic	Benefit	Wo	rksheet		
Respondent	SI Group, Inc.						
Case ID No.							
Reg. Ent. Reference No.							
							Years of
Media						<b>Percent Interest</b>	
Violation No.	27						Depreciation
						5.0	15
	Item Cost	Date Required	Final Date	Yrs	Interest Saved	Costs Saved	EB Amount
Item Description							
Delayed Costs							
Equipment				0.00	\$0	\$0	\$0
Buildings				0.00	\$0	\$0	\$0
Other (as needed)				0.00	\$0	\$0	\$0
Engineering/Construction				0.00	\$0	\$0	\$0
Land				0.00	\$0	n/a	\$0
Record Keeping System	\$1,500	26-Dec-2018	30-Oct-2019	0.84	\$63	n/a	\$63
Training/Sampling				0.00	\$0	n/a	\$0
Remediation/Disposal				0.00	\$0	n/a	\$0
Permit Costs				0.00	\$0	n/a	\$0
Other (as needed)				0.00	\$0	n/a	\$0
	Estimated co	ost to begin maint	aining records i	n the pr	rocess control data	historian demonstr	ating that the
Notes for DELAYED costs						te Required is the e	
	5				I Date is the date		
						•	
Avoided Costs	ANNU	ALIZE avoided c	osts before er		<u> </u>	r one-time avoided	
Disposal				0.00	\$0	\$0	\$0
Personnel				0.00	\$0	\$0	\$0
Inspection/Reporting/Sampling				0.00	\$0 \$0	<u>\$0</u> \$0	<u>\$0</u> \$0
Supplies/Equipment Financial Assurance				0.00	\$0	\$0	\$0 \$0
ONE-TIME avoided costs				0.00	\$0	\$0 \$0	\$0 \$0
Other (as needed)				0.00	\$0	\$0	\$0
Other (as needed)				0.00	\$0	<b>\$</b> U	<b>\$</b> U
Notes for AVOIDED costs							
	-						
Approx. Cost of Compliance		\$1,500			TOTAL		\$63



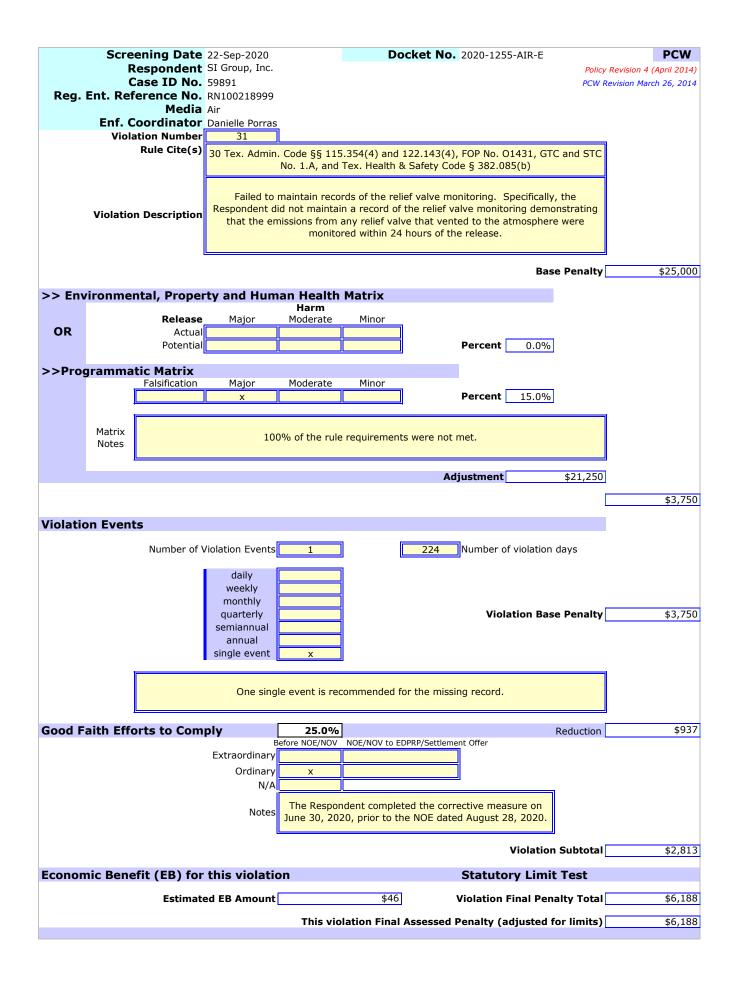
	E	conomic	Benefit	Wo	rksheet		
Respondent	SI Group, Inc.						
Case ID No.	59891						
Reg. Ent. Reference No.	RN100218999						
Media							Years of
Violation No.						Percent Interest	Depreciation
						5.0	15
	Item Cost	Date Required	Final Date	Yrs	Interest Saved	Costs Saved	EB Amount
Them Description		Date Required	i mai Date	113	Interest Saveu	costs Saveu	LD Amount
Item Description							
Deleveral Consta							
Delayed Costs	r	1			\$0	±0	¢O
Equipment Buildings				0.00	\$0	\$0 \$0	<u>\$0</u> \$0
Other (as needed)				0.00	\$0	\$0	\$0 \$0
Engineering/Construction	-			0.00	\$0	\$0	\$0
Land				0.00	\$0	n/a	\$0 \$0
Record Keeping System	\$1,500	26-Dec-2018	20-Jul-2020	1.57	\$118	n/a	\$118
Training/Sampling				0.00	\$0	n/a	\$0
Remediation/Disposal				0.00	\$0	n/a	\$0
Permit Costs				0.00	\$0	n/a	\$0
Other (as needed)				0.00	\$0	n/a	\$0
Notes for DELAYED costs	and operati	on specifications a	and all emissior	n-related	d maintenance req e special condition	esel engine manufa uirements are main and the Final Date	tained at the
Avoided Costs	ANNUA	LIZE avoided c	osts before er	ntering	item (except for	r one-time avoide	d costs)
Disposal				0.00	\$0	\$0	\$0
Personnel				0.00	\$0	\$0	\$0
Inspection/Reporting/Sampling				0.00	\$0	\$0	\$0
Supplies/Equipment				0.00	\$0	\$0	\$0
Financial Assurance				0.00	\$0	\$0	\$0
ONE-TIME avoided costs				0.00	\$0	\$0	\$0
Other (as needed)				0.00	\$0	\$0	\$0
Notes for AVOIDED costs							
Approx. Cost of Compliance		\$1,500			TOTAL		\$118



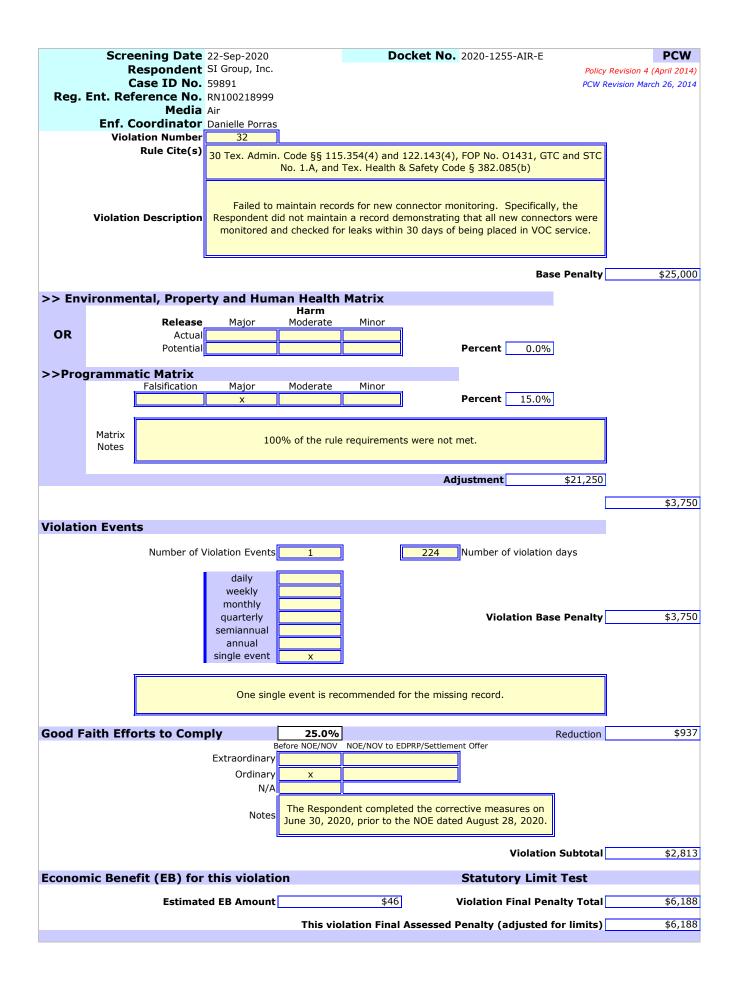
	E	conomic	Benefit	Wo	rksheet		
Respondent	SI Group, Inc.						
Case ID No.	59891						
Reg. Ent. Reference No.							
Media							Years of
Violation No.						Percent Interest	Depreciation
violation No.	25					5.0	15
	Thoma Coat	Data Desuined	Final Data	Vera	Turbowert Coursed	Costs Saved	-
	Item Cost	Date Required	Final Date	Trs	Interest Saved	Costs Saved	EB Amount
Item Description							
Delayed Costs				ə			
Equipment				0.00	\$0	\$0	\$0
Buildings				0.00	\$0	\$0	\$0
Other (as needed)				0.00	\$0	\$0	\$0
Engineering/Construction				0.00	\$0	\$0	\$0
Land				0.00	\$0	n/a	\$0
Record Keeping System				0.00	\$0 \$0	n/a	<u>\$0</u> \$0
Training/Sampling Remediation/Disposal	-			0.00	\$0	n/a n/a	\$0
Permit Costs				0.00	\$0	n/a	\$0
Other (as needed)	\$1,500	28-Mar-2016	31-Jan-2020	3.85	\$288	n/a	\$288
Notes for DELAYED costs			Final Date i	s the da	ate of compliance.	rst date of non-com	
Avoided Costs	ANNU	ALIZE avoided co	osts before er	tering	item (except for	r one-time avoide	d costs)
Disposal				0.00	\$0	\$0	\$0
Personnel				0.00	\$0	\$0	\$0
Inspection/Reporting/Sampling				0.00	\$0	\$0	\$0
Supplies/Equipment				0.00	\$0	\$0	\$0
Financial Assurance				0.00	\$0	\$0	\$0
ONE-TIME avoided costs				0.00	\$0	\$0	\$0
Other (as needed)				0.00	\$0	\$0	\$0
Notes for AVOIDED costs							
Approx. Cost of Compliance		\$1,500			TOTAL		\$288



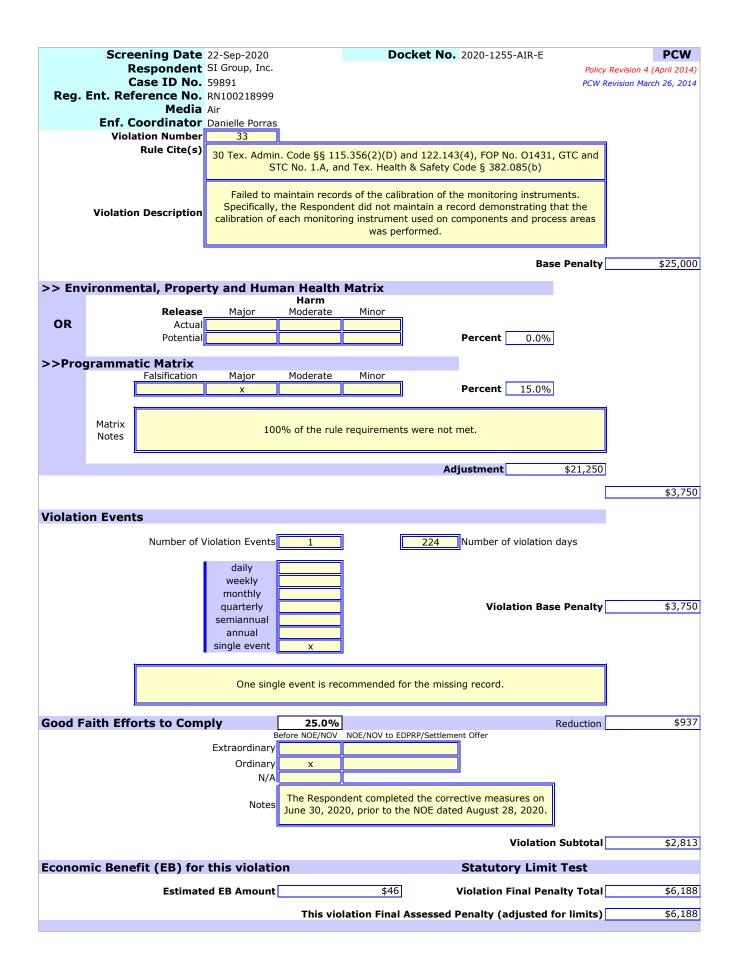
	E	conomic	Benefit	Wo	rksheet		
Respondent	SI Group, Inc.						
Case ID No.	59891						
Reg. Ent. Reference No.	RN100218999						
Media	Air					Percent Interest	Years of
Violation No.	30					Percent Interest	Depreciation
						5.0	
	Item Cost	Date Required	Final Date	Yrs	Interest Saved	Costs Saved	EB Amount
Item Description							
Delayed Costs							
Equipment				0.00	\$0	\$0	\$0
Buildings				0.00	\$0	\$0	\$0
Other (as needed)				0.00	\$0	\$0	\$0
Engineering/Construction				0.00	\$0	\$0	\$0
Land				0.00	\$0	n/a	\$0
Record Keeping System	\$1,500	19-Nov-2019	30-Jun-2020	0.61	\$46	n/a	\$46
Training/Sampling				0.00	\$0	n/a	\$0
Remediation/Disposal				0.00	\$0	n/a	\$0
Permit Costs				0.00	\$0	n/a	\$0
Other (as needed)				0.00	\$0	n/a	\$0
Notes for DELAYED costs	begin maii	ntaining records d re being conducte	emonstrating t d at least once	hat the per shi	AOV checks for VC	e AOV checks for V OC leaks within the l 2 hours. The Date f compliance.	neavy liquid
Avoided Costs	ANNU	LIZE avoided c	osts before e	ntering	item (except for	r one-time avoide	d costs)
Disposal				0.00	\$0	\$0	\$0
Personnel				0.00	\$0	\$0	\$0
Inspection/Reporting/Sampling				0.00	\$0	\$0	\$0
Supplies/Equipment				0.00	\$0	\$0	\$0
Financial Assurance				0.00	\$0	\$0	\$0
ONE-TIME avoided costs				0.00	\$0	\$0	\$0
Other (as needed)	-			0.00	\$0	\$0	\$0
Notes for AVOIDED costs							
Approx. Cost of Compliance		\$1,500			TOTAL		\$46



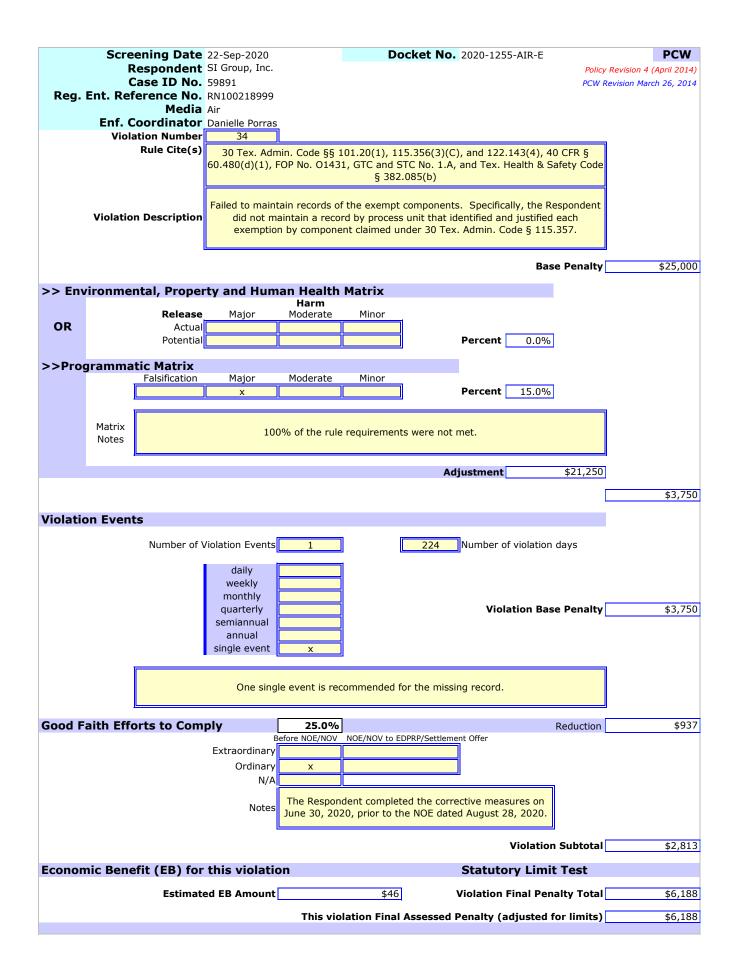
Item Description Delayed Costs Equipment Buildings Other (as needed) Engineering/Construction Land	1 0218999	Date Required	Final Date	0.00	Interest Saved	Percent Interest 5.0 Costs Saved	Years of Depreciation 1! EB Amount
Case ID No. 5989 Reg. Ent. Reference No. RN10 Media Air Violation No. 31 Ite Item Description Delayed Costs Equipment Buildings Other (as needed) Engineering/Construction Land Record Keeping System \$	1 0218999	Date Required	Final Date	0.00		5.0	Depreciation
Reg. Ent. Reference No. RN10         Media         Air         31         Iter         Iter         Iter         Iter         Delayed Costs         Equipment         Buildings         Other (as needed)         Engineering/Construction         Land         Record Keeping System	0218999	Date Required	Final Date	0.00		5.0	Depreciation
Media Air Violation No. 31 Iten Item Description Delayed Costs Equipment Buildings Other (as needed) Engineering/Construction Land Record Keeping System		Date Required	Final Date	0.00		5.0	Depreciation 1
Iter Item Description Delayed Costs Equipment Buildings Other (as needed) Engineering/Construction Land Record Keeping System \$	m Cost	Date Required	Final Date	0.00		5.0	1
Item Description Delayed Costs Equipment Buildings Other (as needed) Engineering/Construction Land Record Keeping System \$	m Cost	Date Required	Final Date	0.00			
Item Description Delayed Costs Equipment Buildings Other (as needed) Engineering/Construction Land Record Keeping System \$	m Cost	Date Required	Final Date	0.00		Costs Saved	EB Amount
Delayed Costs Equipment Buildings Other (as needed) Engineering/Construction Land Record Keeping System							
Equipment Buildings Other (as needed) Engineering/Construction Land Record Keeping System							
Equipment Buildings Other (as needed) Engineering/Construction Land Record Keeping System							
Buildings Other (as needed) Engineering/Construction Land Record Keeping System							
Other (as needed) Engineering/Construction Land Record Keeping System					\$0	\$0	\$0
Engineering/Construction Land Record Keeping System				0.00	\$0	\$0	\$0
Land Record Keeping System				0.00	\$0	\$0	\$0
Record Keeping System				0.00	\$0	\$0	\$0
				0.00	\$0	n/a	\$0
Training/Sampling	1,500	19-Nov-2019	30-Jun-2020	0.61	\$46	n/a	\$46
				0.00	\$0	n/a	\$0
Remediation/Disposal				0.00	\$0	n/a	\$0
Permit Costs				0.00	\$0	n/a	\$0
Other (as needed)				0.00	\$0	n/a	\$0
Notes for DELAYED costs	-	to the atmosphe	re are monitored	d within	-	he emissions from a elease. The Date Re compliance.	
Avoided Costs	ANNUA	LIZE avoided o	osts before en	tering	item (except for	one-time avoided	l costs)
Disposal				0.00	\$0	\$0	\$0
Personnel				0.00	\$0	\$0	\$0
nspection/Reporting/Sampling				0.00	\$0	\$0	\$0
				0.00	\$0	\$0	\$0
Supplies/Equipment				0.00	\$0	\$0	\$0
				0.00	+0		
Supplies/Equipment				0.00	\$0	\$0	\$0
Supplies/Equipment				0.00	\$0 \$0	\$0 \$0	\$0 \$0
Supplies/Equipment Financial Assurance ONE-TIME avoided costs							
Supplies/Equipment Financial Assurance ONE-TIME avoided costs							
Supplies/Equipment Financial Assurance ONE-TIME avoided costs Other (as needed)							
				0.00 0.00 0.00 0.00	\$0 \$0 \$0 \$0 \$0	\$0 \$0 \$0 \$0 \$0	\$0 \$0 \$0 \$0 \$0



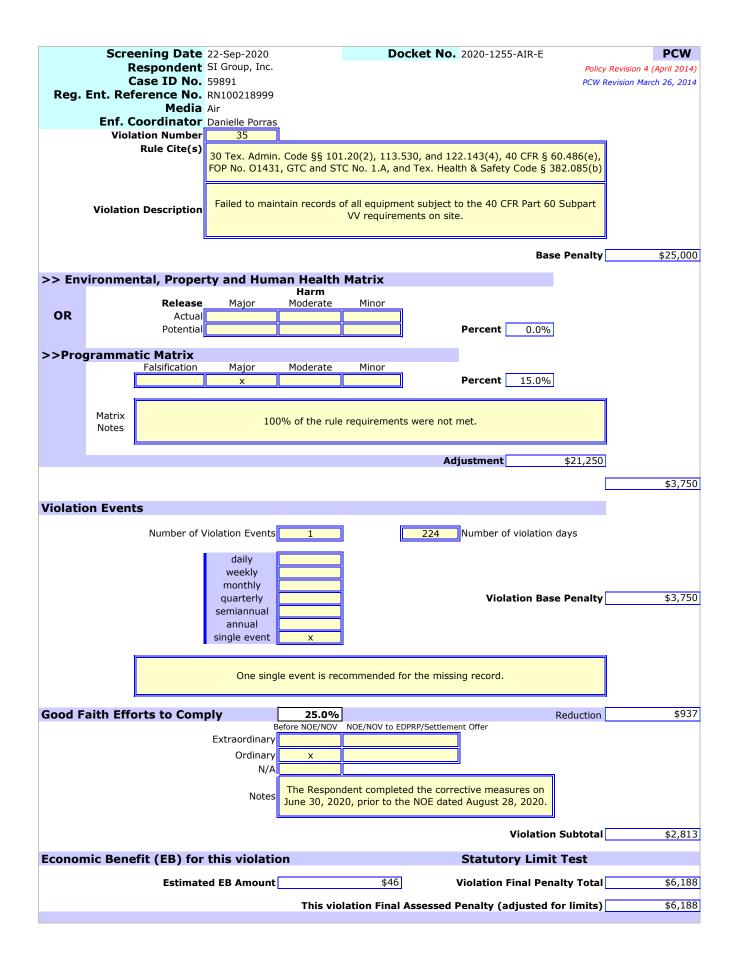
		conomic	Benefit	Wo	rksheet		
Respondent	SI Group, Inc.						
Case ID No.							
Reg. Ent. Reference No.		1					
Media Violation No.	Air					Percent Interest	Years of Depreciation
	52					5.0	
	Item Cost	Date Required	Final Date	Yrs	Interest Saved	Costs Saved	EB Amount
Item Description		Bute Requireu	That Date				LD / mount
Item Description							
Delayed Costs							
Equipment			1	0.00	\$0	\$0	\$0
Buildings				0.00	\$0	\$0	\$0
Other (as needed)				0.00	\$0	\$0	\$0
Engineering/Construction				0.00	\$0	\$0	\$0
Land				0.00	\$0	n/a	\$0
Record Keeping System	\$1,500	19-Nov-2019	30-Jun-2020	0.61	\$46	n/a	\$46
Training/Sampling				0.00	\$0	n/a	\$0
Remediation/Disposal				0.00	\$0	n/a	\$0
Permit Costs				0.00	\$0	n/a	\$0
Other (as needed)				0 00	<u>+0</u>	,	
			•			n/a e new connector mo	-
Notes for DELAYED costs	begin maint monitored ar	aining records for ad checked for lea investiga	the new conne ks within 30 day tion date and th	the rec ctor mo ys of be e Final	ords needed for th onitoring demonstr ing placed in VOC Date is the date of	e new connector me ating that all new co service. The Date f f compliance.	onitoring and onnectors are Required is the
Notes for DELAYED costs	begin maint monitored ar	aining records for ad checked for lea investiga	the new conne ks within 30 day tion date and th	the rec ctor mo ys of be e Final tering	ords needed for th onitoring demonstr ing placed in VOC Date is the date of item (except for	e new connector mo ating that all new co service. The Date F f compliance.	onitoring and onnectors are Required is the d costs)
Notes for DELAYED costs Avoided Costs Disposal	begin maint monitored ar	aining records for ad checked for lea investiga	the new conne ks within 30 day tion date and th	the rec ctor mo ys of be e Final <b>tering</b> 0.00	ords needed for th onitoring demonstr ing placed in VOC Date is the date of item (except for \$0	e new connector mo ating that all new co service. The Date f f compliance. r one-time avoide \$0	onitoring and onnectors are Required is the d costs) \$0
Notes for DELAYED costs Avoided Costs Disposal Personnel	begin maint monitored ar	aining records for ad checked for lea investiga	the new conne ks within 30 day tion date and th	the rec ctor mo ys of be e Final tering 0.00	ords needed for th nitoring demonstr ing placed in VOC Date is the date of item (except for \$0 \$0	e new connector mo ating that all new co service. The Date f f compliance. r <b>one-time avoide</b> \$0 \$0	onitoring and onnectors are Required is the d costs) \$0 \$0
Notes for DELAYED costs Avoided Costs Disposal Personnel inspection/Reporting/Sampling	begin maint monitored ar	aining records for ad checked for lea investiga	the new conne ks within 30 day tion date and th	the rec ctor mc ys of be e Final 0.00 0.00 0.00	ords needed for the philoring demonstr- ing placed in VOC Date is the date of item (except for \$0 \$0 \$0	e new connector mo ating that all new co service. The Date f f compliance. r one-time avoide \$0 \$0 \$0	Accession of the second
Notes for DELAYED costs <b>Avoided Costs</b> Disposal Personnel inspection/Reporting/Sampling Supplies/Equipment	begin maint monitored ar	aining records for ad checked for lea investiga	the new conne ks within 30 day tion date and th	the rec ctor mo ys of be e Final 0.00 0.00 0.00 0.00	ords needed for th pritoring demonstr ing placed in VOC Date is the date of item (except for \$0 \$0 \$0 \$0 \$0	e new connector mo ating that all new co service. The Date f f compliance. • one-time avoide \$0 \$0 \$0 \$0 \$0	d costs) \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0
Notes for DELAYED costs <b>Avoided Costs</b> Disposal Personnel Inspection/Reporting/Sampling Supplies/Equipment Financial Assurance	begin maint monitored ar	aining records for ad checked for lea investiga	the new conne ks within 30 day tion date and th	the rec ctor mo ys of be e Final 0.00 0.00 0.00 0.00 0.00	ords needed for the phitoring demonstr- ing placed in VOC Date is the date of item (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	e new connector mo ating that all new co service. The Date f f compliance. r one-time avoide \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	d costs) \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0
Notes for DELAYED costs <b>Avoided Costs</b> Disposal Personnel inspection/Reporting/Sampling Supplies/Equipment Financial Assurance ONE-TIME avoided costs	begin maint monitored ar	aining records for ad checked for lea investiga	the new conne ks within 30 day tion date and th	the rec ctor mo ys of be e Final 0.00 0.00 0.00 0.00 0.00 0.00	ords needed for the nitoring demonstring placed in VOC Date is the date of item (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	e new connector me ating that all new co service. The Date f f compliance. r one-time avoide \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	d costs) \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0
Notes for DELAYED costs <b>Avoided Costs</b> Disposal Personnel Inspection/Reporting/Sampling Supplies/Equipment Financial Assurance	begin maint monitored ar	aining records for ad checked for lea investiga	the new conne ks within 30 day tion date and th	the rec ctor mo ys of be e Final 0.00 0.00 0.00 0.00 0.00	ords needed for the phitoring demonstr- ing placed in VOC Date is the date of item (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	e new connector mo ating that all new co service. The Date f f compliance. r one-time avoide \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	d costs) \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0
Notes for DELAYED costs <b>Avoided Costs</b> Disposal Personnel nspection/Reporting/Sampling Supplies/Equipment Financial Assurance ONE-TIME avoided costs	begin maint monitored ar	aining records for ad checked for lea investiga	the new conne ks within 30 day tion date and th	the rec ctor mo ys of be e Final 0.00 0.00 0.00 0.00 0.00 0.00	ords needed for the nitoring demonstring placed in VOC Date is the date of item (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	e new connector me ating that all new co service. The Date f f compliance. r one-time avoide \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	d costs) \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0



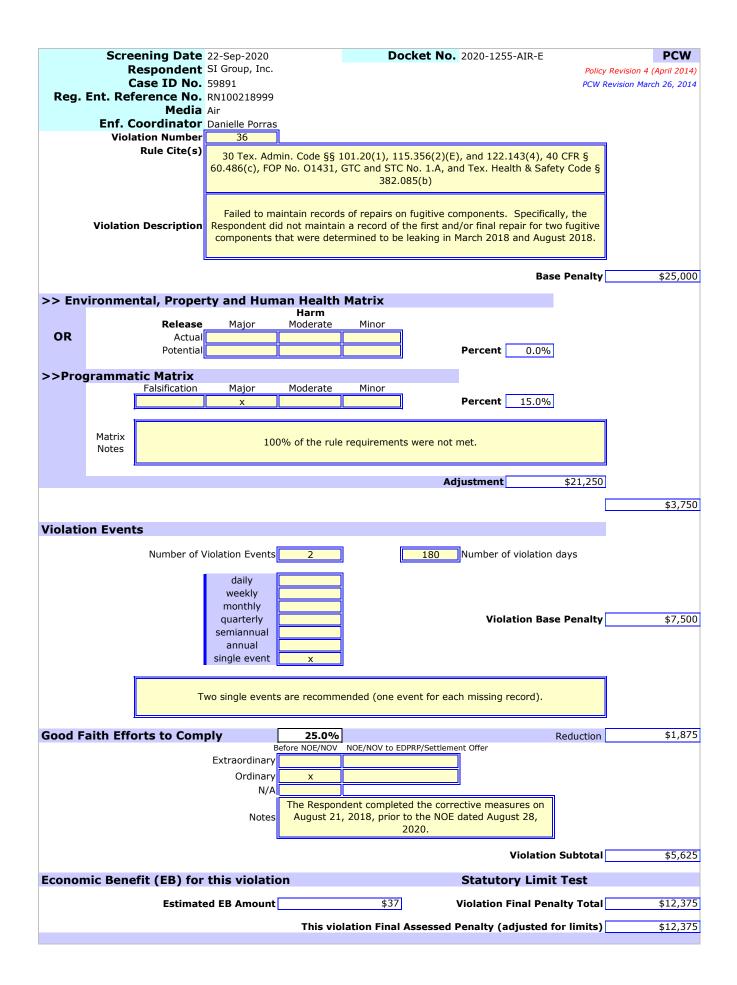
	E	conomic	Benefit	Wo	rksheet		
Respondent	SI Group, Inc.						
Case ID No.	59891						
Reg. Ent. Reference No.							
Media							Years of
Violation No.						Percent Interest	Depreciation
violation No.	55					5.0	
						5.0	15
	Item Cost	Date Required	Final Date	Yrs	Interest Saved	Costs Saved	EB Amount
Item Description							
Delayed Costs							
Equipment				0.00	\$0	\$0	\$0
Buildings				0.00	\$0	\$0	\$0
Other (as needed)				0.00	\$0	\$0	\$0
Engineering/Construction				0.00	\$0	\$0	\$0
Land				0.00	\$0	n/a	\$0
Record Keeping System	\$1,500	19-Nov-2019	30-Jun-2020	0.61	\$46	n/a	\$46
Training/Sampling				0.00	\$0	n/a	\$0
Remediation/Disposal Permit Costs				0.00	\$0	n/a	\$0 \$0
Other (as needed)				0.00	\$0 \$0	n/a n/a	\$0 \$0
Notes for DELAYED costs	instruments a that the calib	nd begin maintair ration of each mo	ning records for nitoring instrum	the cali ient use	bration of the mor ed on components	he calibration of the nitoring instruments and process areas a is the date of compl	demonstrating are performed.
Avoided Costs	ANNUA	LIZE avoided c	osts before en	tering	item (except for	one-time avoide	d costs)
Disposal				0.00	\$0	\$0	\$0
Personnel				0.00	\$0	\$0	\$0
Inspection/Reporting/Sampling				0.00	\$0	\$0	\$0
Supplies/Equipment				0.00	\$0	\$0	\$0
Financial Assurance				0.00	\$0	\$0	\$0
ONE-TIME avoided costs				0.00	\$0	\$0	\$0
Other (as needed)				0.00	\$0	\$0	\$0
Notes for AVOIDED costs							
Approx. Cost of Compliance		\$1,500			TOTAL		\$46



	E	conomic	Benefit	Wo	rksheet		
Respondent	SI Group, Inc.						
Case ID No.	59891						
Reg. Ent. Reference No.	RN100218999						
Media	Air					Percent Interest	Years of
Violation No.	34					Percent Interest	Depreciation
						5.0	15
	Item Cost	<b>Date Required</b>	Final Date	Yrs	Interest Saved	Costs Saved	EB Amount
Item Description							
Delayed Costs				_			
Equipment				0.00	\$0	\$0	\$0
Buildings				0.00	\$0	\$0	\$0
Other (as needed)				0.00	\$0	\$0	\$0
Engineering/Construction				0.00	\$0	\$0	\$0
Land	+1 500	10.11. 2010	20.1 2020	0.00	\$0	n/a	\$0
Record Keeping System	\$1,500	19-Nov-2019	30-Jun-2020	0.61	\$46 \$0	n/a	\$46
Training/Sampling				0.00	\$0	n/a	\$0 \$0
Remediation/Disposal Permit Costs				0.00	\$0	n/a n/a	\$0
Other (as needed)				0.00	\$0	n/a	\$0
other (as needed)		JJ		0.00	<b>3</b> 0	11/ a	<u>\$0</u>
Notes for DELAYED costs	maintaining r	ecords by the pro	cess unit that io 115.357. The I	dentifies Date Re	and justifies each	exempt components exemption by com tigation date and th	ponent claimed
Avoided Costs	ANNU	ALIZE avoided c	osts before er	ntering	item (except for	r one-time avoide	d costs)
Disposal				0.00	\$0	\$0	\$0
Personnel				0.00	\$0	\$0	\$0
Inspection/Reporting/Sampling				0.00	\$0	\$0	\$0
Supplies/Equipment				0.00	\$0	\$0	\$0
Financial Assurance				0.00	\$0	\$0	\$0
ONE-TIME avoided costs				0.00	\$0 \$0	\$0	\$0 \$0
Other (as needed)				0.00	\$0	\$0	\$0
Notes for AVOIDED costs							
Approx. Cost of Compliance		\$1,500			TOTAL		\$46



	E	conomic	Benefit	Wo	rksheet		
Respondent	SI Group, Inc.						
Case ID No.	59891						
Reg. Ent. Reference No.	RN100218999						
Media	Air					Percent Interest	Years of
Violation No.	35					r creent interest	Depreciation
						5.0	15
	Item Cost	<b>Date Required</b>	Final Date	Yrs	Interest Saved	Costs Saved	EB Amount
Item Description							
-							
Delayed Costs				_			
Equipment				0.00	\$0	\$0	\$0
Buildings				0.00	\$0	\$0	\$0
Other (as needed)				0.00	\$0	\$0	\$0
Engineering/Construction				0.00	\$0	\$0	\$0
Land	±4 500	40.01. 2010	20.1 2020	0.00	\$0	n/a	\$0
Record Keeping System	\$1,500	19-Nov-2019	30-Jun-2020	0.61	\$46	n/a	\$46
Training/Sampling				0.00	\$0 \$0	n/a	\$0 \$0
Remediation/Disposal Permit Costs				0.00	\$0	n/a n/a	\$0
Other (as needed)				0.00	\$0	n/a	\$0
other (as needed)		الـــــــــــا		0.00	<u> </u>	11/ d	<u>\$0</u>
						equipment subject equipment subject	
Notes for DELAYED costs						ion date and the Fir	
	1 410 00 040				mpliance.		la Date 15 the
Avoided Costs	ANNU	ALIZE avoided c	osts before er	ntering	<u> </u>	r one-time avoide	
Disposal				0.00	\$0	\$0	\$0
Personnel				0.00	\$0	\$0	\$0
Inspection/Reporting/Sampling				0.00	\$0	\$0	\$0
Supplies/Equipment				0.00	\$0	\$0	\$0
Financial Assurance				0.00	\$0	\$0	\$0
ONE-TIME avoided costs				0.00	\$0 \$0	\$0	\$0 \$0
Other (as needed)		<u> </u>		0.00	\$0	\$0	\$0
Notes for AVOIDED costs							
Approx. Cost of Compliance		\$1,500			TOTAL		\$46
Approx. Cost of Compliance	L	\$1,500			TOTAL		\$40



	E	conomic	Benefit	Wo	rksheet		
Respondent	SI Group, Inc.						
Case ID No.							
Reg. Ent. Reference No.	RN100218999						
Media						_	Years of
Violation No.						Percent Interest	Depreciation
						5.0	15
	Item Cost	Date Required	Final Date	Yrs	<b>Interest Saved</b>	Costs Saved	EB Amount
Item Description							
Delayed Costs							
Equipment				0.00	\$0	\$0	\$0
Buildings				0.00	\$0	\$0	\$0
Other (as needed)				0.00	\$0	\$0	\$0
Engineering/Construction				0.00	\$0	\$0	\$0
Land				0.00	\$0	n/a	\$0
Record Keeping System	\$1,500	22-Feb-2018	21-Aug-2018	0.49	\$37	n/a	\$37
Training/Sampling				0.00	\$0	n/a	\$0
Remediation/Disposal				0.00	\$0	n/a	\$0
Permit Costs				0.00	\$0	n/a	\$0
Other (as needed)				0.00	\$0	n/a	\$0
Notes for DELAYED costs						nal repair for the tw ust 2018. The Date	
	•		•		Final Date is the d	•	
Avoided Costs	ANNU	ALIZE avoided o	osts before er	ntering	· · · ·	r one-time avoide	d costs)
Disposal				0.00	\$0	\$0	\$0
Personnel				0.00	\$0	\$0	\$0
Inspection/Reporting/Sampling				0.00	\$0	\$0	\$0
Supplies/Equipment				0.00	\$0	\$0	\$0
Financial Assurance				0.00	\$0	\$0	\$0
ONE-TIME avoided costs				0.00	\$0	\$0	\$0
Other (as needed)				0.00	\$0	\$0	\$0
Notes for AVOIDED costs							
Approx. Cost of Compliance		\$1,500			TOTAL		\$37



# Compliance History Report

Compliance History Report for CN603119280, RN100218999, Rating Year 2022 which includes Compliance History (CH) components from September 1, 2017, through August 31, 2022.

Customer, Respondent, or Owner/Operator:	CN603119280, SI Group, Inc.	Classification: HIGH	<b>Rating:</b> 0.00
Regulated Entity:	RN100218999, SI Group Texas Operations	Classification: HIGH	<b>Rating:</b> 0.00
<b>Complexity Points:</b>	20	Repeat Violator: NO	
CH Group:	05 - Chemical Manufacturing		
Location:	702 Farm-to-Market Road 523, Fr	eeport, Brazoria County, Texas	
TCEQ Region:	REGION 12 - HOUSTON		
INDUSTRIAL AND HAZARD TXD010797389 Compliance History Peri Date Compliance History Agency Decision Require	S PERMIT 2341 S REGISTRATION 48692 S REGISTRATION 169346 S PERMIT 84092 S REGISTRATION 111464 S REGISTRATION 124346 S REGISTRATION 169557 S REGISTRATION 142343 001961000 RY ACCOUNT NUMBER BL0048R FOUS WASTE EPA ID Od: September 01, 2017 to August S REPORT Prepared: December	forcement	RATION 29053 IT NUMBER BL0048R 4 4803900033 139407 RATION 111605 RATION 111467 RATION 164667 G ID NUMBER
TCEQ Staff Member to C	ontact for Additional Inform	ation Regarding This Compliance	History.
Name: Danielle Porras		<b>Phone:</b> (713) 767-36	582
,	nce and/or operation for the full five	, , , ,	YES
	change in ownership/operator of the	e site during the compliance period? ed in Sections A - J	NO
1 Effective Date: 1 Classification: Citation: 30 T 30 T 30 T 30 T		ER 2017-1144-AIR-E (Findings Order-, .115(b)(2)(F) .115(c) .116(a)(1)	Agreed Order Without Denial)

5C THSC Chapter 382 382.085(b) Rqmt Prov: Special Condition 1 PERMIT

ST&C 11 OP

Description: Failed to comply with the representations with regard to construction plans and operation procedures in an application for a permit.

Classification: Minor Citation: 30 TAC Chapter 101, SubChapter A 101.20(1) 30 TAC Chapter 116, SubChapter B 116.115(c) 30 TAC Chapter 122, SubChapter B 122.143(4) 40 CFR Chapter 60, SubChapter C, PT 60, SubPT A 60.18(c)(2) 5C THSC Chapter 382 382.085(b) Rqmt Prov: Special Condition 4B PERMIT ST&C 1A and 11 OP Description: Failed to operate a flare with a flame present at all times and/or a constant pilot flame. Specifically, the Respondent reported that a continuous pilot flame could not be confirmed. Classification: Moderate Citation: 30 TAC Chapter 122, SubChapter B 122.143(4) 30 TAC Chapter 122, SubChapter B 122.145(2) 5C THSC Chapter 382 382.085(b) Rgmt Prov: General Terms & Conditions OP Description: Failure to report all instances of deviations. Classification: Moderate Citation: 30 TAC Chapter 116, SubChapter B 116.115(b)(2)(F) 30 TAC Chapter 116, SubChapter B 116.115(c) 30 TAC Chapter 122, SubChapter B 122.143(4) 5C THSC Chapter 382 382.085(b) Rqmt Prov: Special Condition 2 PERMIT Special Condition 6B PERMIT Special Condition 6D PERMIT Special Condition 7B(3) PERMIT Special Condition 8D PERMIT Special Term & Condition 11 OP Description: Failure to maintain or record Maintenance, Startup, and Shutdown (MSS) records (CATEGORY A.12.i.6 VIOLATION). ADMINORDER 2018-1549-IWD-E (1660 Order-Agreed Order With Denial) Effective Date: 09/10/2019 Classification: Moderate Citation: 2D TWC Chapter 26, SubChapter A 26.121(a)(1) 30 TAC Chapter 305, SubChapter F 305.125(1) Ramt Prov: Effluent Limits PERMIT Description: Failed to comply with permitted effluent limitations, in violation of 30 TEX. ADMIN. CODE § 305.125(1), TEX. WATER CODE § 26.121(a)(1), and Texas Pollutant Discharge Elimination System ("TPDES") Permit No. WQ0001961000, Effluent Limitations and Monitoring Requirements No. 1, Outfall No. 101. Effective Date: 12/17/2019 ADMINORDER 2019-0237-AIR-E (1660 Order-Agreed Order With Denial) Classification: Moderate 30 TAC Chapter 122, SubChapter B 122.143(4) Citation: 30 TAC Chapter 122, SubChapter B 122.146(1) 30 TAC Chapter 122, SubChapter B 122.146(2) 5C THSC Chapter 382 382.085(b) Rqmt Prov: General Terms & Conditions OP Description: Failure to certify compliance for the period of February 22, 2017 to August 21, 2017 (Category A12(i)(7)). Effective Date: 12/18/2019 ADMINORDER 2018-1474-AIR-E (1660 Order-Agreed Order With Denial) Classification: Minor 30 TAC Chapter 116, SubChapter B 116.115(c) Citation: 30 TAC Chapter 122, SubChapter B 122.143(4) 5C THSC Chapter 382 382.085(b) Rgmt Prov: FOP 01431, ST&C 11 OP NSR 2341, SC 4D PERMIT Description: Failure to comply with the minimum percent ("%") by volume fuel gas mixture for combustion for the flare. Specifically, the minimum 28% by volume fuel gas mixture for combustion based on a 6-minute average in Flare X-501,

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EPN PX501, was not maintained when the fuel gas mixture ranged from 6.0% to 27% by volume fuel gas mixture on 125 instances that occurred on 55 days from March 22, 2018 to February 16, 2016.

5

Classification: Moderate

Citation: 30 TAC Chapter 116, SubChapter B 116.115(c) 30 TAC Chapter 122, SubChapter B 122.143(4)

5C THSC Chapter 382 382.085(b) Rqmt Prov: General Terms and Conditions OP

Special Condition 5D PERMIT

Special Term & Condition 11 OP

Description: Failed to maintain with the minimum 28 percent ("%") by volume fuel gas mixture for combustion in the flare. Specifically, the Respondent did not maintain the minimum 28% by volume fuel gas mixture for combustion based on a six-minute average for Flare X-695 when the fuel gas mixture ranged from 0.26% to 26.66% by volume for 2,297 hours on March 9, 2019 and from December 10, 2019 through March 16, 2020.

#### **B.** Criminal convictions:

N/A

### C. Chronic excessive emissions events:

N/A

## D. The approval dates of investigations (CCEDS Inv. Track. No.):

	<b>. . .</b>	(
Item 1	December 13, 2017	(1468657)
Item 2	January 10, 2018	(1475367)
Item 3	February 12, 2018	(1487563)
Item 4	March 09, 2018	(1491242)
Item 5	April 12, 2018	(1494493)
Item 6	May 11, 2018	(1501439)
Item 7	September 19, 2018	(1528096)
Item 8	November 14, 2018	(1542273)
Item 9	December 08, 2018	(1546041)
Item 10	January 11, 2019	(1562161)
Item 11	February 12, 2019	(1562159)
Item 12	March 11, 2019	(1562160)
Item 13	March 15, 2019	(1552334)
Item 14	April 12, 2019	(1572639)
Item 15	May 09, 2019	(1584889)
Item 16	June 12, 2019	(1584890)
Item 17	August 16, 2019	(1600311)
Item 18	September 20, 2019	(1607203)
Item 19	November 20, 2019	(1619866)
Item 20	December 16, 2019	(1627227)
Item 21	January 16, 2020	(1634863)
Item 22	February 18, 2020	(1641478)
Item 23	March 17, 2020	(1647988)
Item 24	April 22, 2020	(1645143)
Item 25	April 24, 2020	(1644776)
Item 26	May 20, 2020	(1660904)
Item 27	June 18, 2020	(1667437)
Item 28	July 17, 2020	(1674386)
Item 29	August 10, 2020	(1664688)
Item 30	August 14, 2020	(1681161)
Item 31	August 31, 2020	(1597728)
Item 32	September 17, 2020	(1687730)
Item 33	September 18, 2020	(1694076)
Item 34	November 16, 2020	(1714885)
Item 35	December 18, 2020	(1714886)
Item 36	January 12, 2021	(1714887)
Item 37	January 15, 2021	(1696713)
Item 38	February 17, 2021	(1727953)
Item 39	April 28, 2021	(1727955)
Item 40	May 20, 2021	(1741264)
Item 41	June 03, 2021	(1724717)
Item 42	June 14, 2021	(1741265)

Item 43	July 17, 2021	(1752510)
Item 44	August 10, 2021	(1747264)
Item 45	August 13, 2021	(1757935)
Item 46	September 20, 2021	(1767168)
Item 47	October 20, 2021	(1765211)
Item 48	December 16, 2021	(1791467)
Item 49	January 18, 2022	(1799309)
Item 50	February 11, 2022	(1807127)
Item 51	March 11, 2022	(1814193)
Item 52	April 12, 2022	(1820766)
Item 53	May 17, 2022	(1829598)
Item 54	June 16, 2022	(1835895)
Item 55	July 18, 2022	(1843096)
Item 56	August 17, 2022	(1849264)
Item 57	September 15, 2022	(1857026)

## E. Written notices of violations (NOV) (CCEDS Inv. Track. No.):

A notice of violation represents a written allegation of a violation of a specific regulatory requirement from the commission to a regulated entity. A notice of violation is not a final enforcement action, nor proof that a violation has actually occurred.

			, p	,,,
1	Date: 06,	/30/2022 (1762629)		
	Self Report?	NO	Classification:	Moderate
	Citation:	2341 PERMIT		
		30 TAC Chapter 116, SubChapter B 116.11	.5(c)	
		30 TAC Chapter 122, SubChapter B 122.14	l3(4)	
		5C THSC Chapter 382 382.085(b)		
		O1431 OP		
	Description:	Failure to maintain Natural Gas Content lin	hit of 28 % by volu	ume for Flare [EPN:
		P3014, Unit ID: X-501] (Category B17)		
	Self Report?	NO	Classification:	Moderate
	Citation:	2341 PERMIT		
		30 TAC Chapter 116, SubChapter B 116.11		
		30 TAC Chapter 122, SubChapter B 122.14	13(4)	
		5C THSC Chapter 382 382.085(b)		
		O1431 OP		
	Description:	Failure to maintain Natural Gas Content lin		ume for Flare [EPN:
		EPN: P6001, Unit ID: X-695] (Category B1	,	
	Self Report?	NO	Classification:	Moderate
	Citation:	30 TAC Chapter 111, SubChapter A 111.11		
		30 TAC Chapter 122, SubChapter B 122.14	13(4)	
		5C THSC Chapter 382 382.085(b)		
		01431 OP		
	Description:	Failure to perform daily visible emissions c		nit IDs: X-401,
		X-501, X-601, X-602, X-695, & X-794] (Ca		
	Self Report?	NO	Classification:	Moderate
	Citation:	2341 PERMIT		
		30 TAC Chapter 116, SubChapter B 116.11		
		30 TAC Chapter 122, SubChapter B 122.14		
		40 CFR Chapter 60, SubChapter C, PT 60,	SUDPT KD 60.1120	o(a)(3)(I)
		5C THSC Chapter 382 382.085(b)		
	<b>D</b>	O1431 OP		
	Description:	Failure to maintain the operational parame		overy System for
	Calf Danaut?	Flare [EPN: P3014, Unit ID: X-501] (Categ	, ,,,	Medavata
	Self Report?	NO	Classification:	Moderate
	Citation:	2341 PERMIT	<b>F</b> (a)	
		30 TAC Chapter 116, SubChapter B 116.11	.5(C)	
		30 TAC Chapter 122, SubChapter B 122.14 5C THSC Chapter 382 382.085(b)	13(4)	
		01431 OP		
	Description		uctivity complex f	or Cooling Toward
	Description:	Failure to collect and/or analyze daily cond [EPNs: W-501, W-502 & W-503] (Category		or cooling towers
	Self Report?	NO	Classification:	Moderate
	Citation:		Classification.	Moderate
		2341 PERMIT 30 TAC Chapter 116, SubChapter B 116.11	5(c)	
		30 TAC Chapter 122, SubChapter B 122.14		
		40 CFR Chapter 60, SubChapter C, PT 60,		(2)
		5C THSC Chapter 382 382.085(b)		
		01431 OP		

Description:	Failure to maintain pilot flame for Flare [EP (Category B17)	N: P4004; Unit ID	: Flare X-401]			
Self Report?	NÒ	Classification:	Moderate			
Citation:	2341 PERMIT 30 TAC Chapter 116, SubChapter B 116.11	F(c)				
	30 TAC Chapter 112, SubChapter B 110.11					
	40 CFR Chapter 60, SubChapter C, PT 60, S		2)			
	5C THSC Chapter 382 382.085(b) 01431 OP					
Description:	Failure to maintain pilot flame for Flare [EP	N: PX501; Unit ID	: Flare X-501]			
Colf Doport?	(Category B17)	Classification:	Moderate			
Self Report? Citation:	NO 2341 PERMIT	Classification.	Moderate			
	30 TAC Chapter 116, SubChapter B 116.11					
	30 TAC Chapter 122, SubChapter B 122.14 40 CFR Chapter 60, SubChapter C, PT 60, S		2)			
	5C THSC Chapter 382 382.085(b)		_)			
Description	O1431 OP		L Elara V 6021			
Description:	Failure to maintain pilot flame for Flare [EP (Category B17)	N: P3015; Unit ID	Fidre X-002]			
Self Report?	NÒ	Classification:	Moderate			
Citation:	2341 PERMIT 30 TAC Chapter 116, SubChapter B 116.11	5(c)				
	30 TAC Chapter 122, SubChapter B 122.14	3(4)				
	40 CFR Chapter 60, SubChapter C, PT 60, 5 5C THSC Chapter 382 382.085(b)	SubPT A 60.18(c)(	2)			
	01431 OP					
Description:	Failure to maintain pilot flame for Flare [EP	N: P7002; Unit ID	: Flare X- 794]			
Self Report?	(Category B17) NO	Classification:	Moderate			
Citation:	30 TAC Chapter 101, SubChapter F 101.20	1(b)(2)				
	30 TAC Chapter 122, SubChapter B 122.14 5C THSC Chapter 382 382.085(b)	3(4)				
	01431 OP					
Description:	Failure to document required information for	or non-reportable	emission events			
Self Report?	(Category B1) NO	Classification:	Moderate			
Citation:	2341 PERMIT	<b>F</b> (.)				
	30 TAC Chapter 116, SubChapter B 116.11 30 TAC Chapter 122, SubChapter B 122.14					
	40 CFR Chapter 60, SubChapter C, PT 60, S		3)(i)(B)(ii)			
	5C THSC Chapter 382 382.085(b) 01431 OP					
Description:	Failure to maintain heating value of 300 Br					
Solf Doport?	feet (Btu/scf) or greater for Flare [EPN: X-7 NO	feet (Btu/scf) or greater for Flare [EPN: X-794] (Category C7)				
Self Report? Citation:	30 TAC Chapter 122, SubChapter B 122.14	Classification: 3(4)	Moderate			
	5C THSC Chapter 382 382.085(b)					
Description:	O1431 OP Failure to document degreaser inspections	for degreaser [FPI				
·	(Category B1)					
Self Report? Citation:	NO 2341 PERMIT	Classification:	Moderate			
Citation.	30 TAC Chapter 116, SubChapter B 116.11	5(b)(2)(F)				
	30 TAC Chapter 116, SubChapter B 116.11					
	30 TAC Chapter 122, SubChapter B 122.14 5C THSC Chapter 382 382.085(b)	3(4)				
	O1431 OP					
Description:	Failure to prevent exceedances of volatile c lb/hr) for Storage Tanks (Category B17)	organic compounds	s (VOC) limits (in			
Self Report?	NO	Classification:	Moderate			
Citation:	2341 PERMIT	5(c)				
	30 TAC Chapter 116, SubChapter B 116.11 30 TAC Chapter 122, SubChapter B 122.14					
	5C THSC Chapter 382 382.085(b)	-				
Description:	O1431 OP Failure to collect and/or analyze weekly Tot	tal Dissolved Solid	s (TDS) samples for			
	Cooling Towers [EPNs: W-501, W-502 & W					

#### F. Environmental audits:

Disclosure Date: 03/22/2018 Viol. Classification: Moderate Citation: 30 TAC Chapter 116, SubChapter B 116.115(b)(2)(F) 30 TAC Chapter 116, SubChapter B 116.115(c) 30 TAC Chapter 116, SubChapter B 116.116(a)(2) Description: Failure to monitor equipment for leaks that resulted in unauthorized VOC emissions. Chemical leaking out of drain plug in conduit at bottom of MUX unit at DC-501 A. Thermocouple well leaking. Viol. Classification: Moderate Citation: 30 TAC Chapter 116, SubChapter B 116.115(b)(2)(F) 30 TAC Chapter 116, SubChapter B 116.115(c) Description: Failure to monitor F-608 valves for leaks resulting in unauthorized VOC emissions. Material leaked by purge point valve near F-608. Valve one turn open and cap was off. Viol. Classification: Moderate Citation: 30 TAC Chapter 116, SubChapter B 116.115(b)(2)(F) 30 TAC Chapter 116, SubChapter B 116.115(c) 30 TAC Chapter 116, SubChapter B 116.116(a)(2) Description: Failure to monitor F-785 for leaks that resulted in unauthorized VOC emissions. Chemical present on side of Tank F-785. Viol. Classification: Moderate Citation: 30 TAC Chapter 116, SubChapter B 116.115(b)(2)(F) 30 TAC Chapter 116, SubChapter B 116.115(c) 30 TAC Chapter 116, SubChapter B 116.116(a)(2) Description: Failure to monitor leaks form F-322 resulting in authorized emissions. Chemical release from F-322 from around rotary valve shaft. F-322 full of solids; backed up into chute to rotary valve. Steamed rotary valve to unplug it. Condensate and chemical was released around valve shaft. Viol. Classification: Moderate Citation: 30 TAC Chapter 116, SubChapter B 116.115(b)(2)(F) 30 TAC Chapter 116, SubChapter B 116.115(c) 30 TAC Chapter 116, SubChapter B 116.116(a)(2) Description: Failure to monitor F-612C for leaks that resulted in unauthorized VOC emissions. Liquid at base of tank F-612C. Tank leaking due to external corrosion. Viol. Classification: Moderate Citation: 30 TAC Chapter 116, SubChapter B 116.115(b)(2)(F) 30 TAC Chapter 116, SubChapter B 116.115(c) 30 TAC Chapter 116, SubChapter B 116.116(a)(2) Description: Failure to monitor LR-D resulting in unauthorized emissions. Chemical spill while loading tankwagon at LR-D. Cam locks that lock loading line to loading lid became loose and released liquid line from lid just after flow started Viol. Classification: Moderate Citation: 30 TAC Chapter 116, SubChapter B 116.115(b)(2)(F) 30 TAC Chapter 116, SubChapter B 116.115(c) 30 TAC Chapter 116, SubChapter B 116.116(a)(2) Description: Failure to monitor F-743 for leaks that resulted in unauthorized VOC emissions. Chemical around bottom of Tank F-743. Tank leaking due to external corrosion. Viol. Classification: Moderate Citation: 30 TAC Chapter 116, SubChapter B 116.115(b)(2)(F) 30 TAC Chapter 116, SubChapter B 116.115(c) 30 TAC Chapter 116, SubChapter B 116.116(a)(2) Description: Failure to monitor F-620/F-621 for leaks that resulted in unauthorized VOC emissions. Wet chemical stain on concrete between F-620/621 and west end of tank farm. Viol. Classification: Moderate Citation: 30 TAC Chapter 116, SubChapter B 116.115(b)(2)(F) 30 TAC Chapter 116, SubChapter B 116.115(c) 30 TAC Chapter 116, SubChapter B 116.116(a)(2) Description: Failure to monitor Tank F-612AA for leaks that resulted in VOC unauthorized emissions. Tank F-612AA leaking at bottom. External corrosion on tank. Viol. Classification: Moderate 30 TAC Chapter 116, SubChapter B 116.115(b)(2)(F) Citation: 30 TAC Chapter 116, SubChapter B 116.115(c) 30 TAC Chapter 116, SubChapter B 116.116(a)(2) Description: Failure to monitor Tank F-620 for leaks that resulted in unauthorized VOC emissions. Tank F-620 leaking at bottom. External corrosion on tank.

Viol. Classification: Moderate

Citation: 30 TAC Chapter 116, SubChapter B 116.115(b)(2)(F)

30 TAC Chapter 116, SubChapter B 116.115(c) 30 TAC Chapter 116, SubChapter B 116.116(a)(2)

- Description: Failure to monitor TF-4 steaming operations. Steaming process equipment into drum at TF-4. Condensate overflowed from drum. Inadequate surveillance of steaming operation.
- Viol. Classification: Moderate
- Citation: 30 TAC Chapter 116, SubChapter B 116.115(b)(2)(F) 30 TAC Chapter 116, SubChapter B 116.115(c) 30 TAC Chapter 116, SubChapter B 116.116(a)(2)
- Description: Failure to monitor the pressure during loading operations. PSV lifted due to high pressure in system. The high pressure was caused by the valving configuration while loading and drumming were both taking from system.
- Viol. Classification: Moderate
- Citation: 30 TAC Chapter 116, SubChapter B 116.115(b)(2)(F) 30 TAC Chapter 116, SubChapter B 116.115(c) 30 TAC Chapter 116, SubChapter B 116.116(a)(2)
- Description: Failure to monitor C-751A for leaks that resulted in VOC emissions. Chemical was released from open drain valve that was plugged with chemical when residual pressure in C-751A piping system overcame the plug. Viol. Classification: Moderate
- Citation: 30 TAC Chapter 116, SubChapter B 116.115(b)(2)(F) 30 TAC Chapter 116, SubChapter B 116.115(c) 30 TAC Chapter 116, SubChapter B 116.116(a)(2)
- Description: Failure to monitor Flare X-401 processes. Flare X-401 intermittently emitted a thin (transparent) white smoke for greater than 5 minutes in a two hour period on the following dates: 09/15/17 and 09/22/17. Additionally, Flare X-401 intermittently emitted a thin (transparent) white smoke for greater than 5 minutes in a two hour period 16 times between 02/23/17 and 05/01/17.
- Viol. Classification: Moderate
- Citation: 30 TAC Chapter 116, SubChapter B 116.115(b)(2)(F)
  - 30 TAC Chapter 116, SubChapter B 116.115(c)
  - 30 TAC Chapter 116, SubChapter B 116.116(a)(2)
- Description: Failure to monitor Flare X--695 processes. Flare X-695 intermittently emitted a thin (transparent) white smoke for greater than 5 minutes in a two hour period on 01/27/17 and 07/05/17. Flare X-695 intermittently emitted a thin (transparent) white smoke for greater than 5 minutes in a two hour period on 08/31/17.
- Viol. Classification: Moderate
- Citation: 30 TAC Chapter 122, SubChapter B 122.145(2) 30 TAC Chapter 122, SubChapter B 122.146
- Description: Failure to report deviations (i.e., The intermittent emissions of white smoke listed above on this page were not previously reported for the 08/22/16-02/21/17 and 02/22/17-08/21/17 reporting periods).
- Viol. Classification: Moderate
- Citation: 30 TAC Chapter 116, SubChapter B 116.115(b)(2)(F)
  - 30 TAC Chapter 116, SubChapter B 116.115(c)
  - 30 TAC Chapter 116, SubChapter B 116.116(a)(2)
- Description: Failure to monitor DC-750 processes. It was discovered on 03/14/18 that some of the vent gas from reactor DC-750 when producing 2,6-xylenol was going to heater B-790 as the control device instead of it all going to flare X-794. B-790 is a permitted control device for other vent streams from DC-750 including 2,4-xylenol, but the 2,6-xylenol production vent gas was only represented and permitted to go to X-794 as the control device.
- Viol. Classification: Moderate
- Citation: 30 TAC Chapter 122, SubChapter B 122.145(2)
  - 30 TAC Chapter 122, SubChapter B 122.146
- Description: Failure to report deviations (i.e., the DC-750 2,6-xylenol vent gas going to B-790 was not previously reported during the last 3 deviation reporting periods).
- Viol. Classification: Moderate
- Citation: 30 TAC Chapter 116, SubChapter B 116.115(b)(2)(F) 30 TAC Chapter 116, SubChapter B 116.115(c)
- Description: Failure to place plug flush with port of seal during recent repair causing Pump J-736A to leak.
- Viol. Classification: Moderate
- Citation: 30 TAC Chapter 116, SubChapter B 116.115(b)(2)(F)
  - 30 TAC Chapter 116, SubChapter B 116.115(c)
  - 30 TAC Chapter 116, SubChapter B 116.116(a)(2)
- Description: Failure to maintain equipment. Valve leakage caused an Isobutylene release at Track 1 Spot 3 while venting a line to flare.
- Viol. Classification: Moderate
- Citation: 30 TAC Chapter 116, SubChapter B 116.115(b)(2)(F) 30 TAC Chapter 116, SubChapter B 116.115(c)

Description: Failure to maintain equipment, Valve leakage on E-607 header to Tank F-611A. Viol. Classification: Moderate 30 TAC Chapter 116, SubChapter B 116.115(b)(2)(F) Citation: 30 TAC Chapter 116, SubChapter B 116.115(c) 30 TAC Chapter 116, SubChapter B 116.116(a)(2) Description: Failure to maintain equipment. Valve leakage at Tank F-611A. Viol. Classification: Moderate Citation: 30 TAC Chapter 116, SubChapter B 116.115(b)(2)(F) 30 TAC Chapter 116, SubChapter B 116.115(c) 30 TAC Chapter 116, SubChapter B 116.116(a)(2) Description: Failure to completely empty F-629 KO Pot before removing the low point drain for replacement due to plugging of the low point drain. Viol. Classification: Moderate Citation: 30 TAC Chapter 116, SubChapter B 116.115(b)(2)(F) 30 TAC Chapter 116, SubChapter B 116.115(c) 30 TAC Chapter 116, SubChapter B 116.116 Description: Failure to align valves properly resulting in pressure build up and the release of emissions from Tank F-704 Viol. Classification: Moderate Citation: 30 TAC Chapter 116, SubChapter B 116.115(b)(2)(F) 30 TAC Chapter 116, SubChapter B 116.115(c) 30 TAC Chapter 116, SubChapter B 116.116(a)(2) Description: Failure to close J-742 drain valve resulting in release of chemical without a bucket to collect the release. Viol. Classification: Moderate Citation: 30 TAC Chapter 116, SubChapter B 116.115(b)(2)(F) 30 TAC Chapter 116, SubChapter B 116.115(c) 30 TAC Chapter 116, SubChapter B 116.116(a)(2) Description: Failure to maintain equipment. Tower E-670 sight glass piping leaking. Viol. Classification: Moderate Citation: 30 TAC Chapter 116, SubChapter B 116.115(b)(2)(F) 30 TAC Chapter 116, SubChapter B 116.115(c) 30 TAC Chapter 116, SubChapter B 116.116(a)(2) Description: Failure to maintain equipment. Tower E-709 OH control valve station leaking. Viol. Classification: Moderate Citation: 30 TAC Chapter 116, SubChapter B 116.115(b)(2)(F) 30 TAC Chapter 116, SubChapter B 116.115(c) 30 TAC Chapter 116, SubChapter B 116.116(a)(2) Description: Failure to remove all residual chemical from the E-709 OH product control valve system due to the low point drain valve being plugged with frozen chemical, the frozen chemical breaking free, and the drain valve being open allowing the previously frozen chemical to exit the system and overfill the collection bucket. Viol. Classification: Moderate Citation: 30 TAC Chapter 116, SubChapter B 116.115(b)(2)(F) 30 TAC Chapter 116, SubChapter B 116.115(c) 30 TAC Chapter 116, SubChapter B 116.116(a)(2) Description: Failure to maintain equipment. Valve leakage at Pump J-622A low point drain valve Viol. Classification: Moderate Citation: 30 TAC Chapter 116, SubChapter B 116.116(a)(2) Description: Failure to maintain equipment. LR-D loading hose leaked at gasket Viol. Classification: Moderate Citation: 30 TAC Chapter 116, SubChapter B 116.115(b)(2)(F) 30 TAC Chapter 116, SubChapter B 116.115(c) 30 TAC Chapter 116, SubChapter B 116.116(a)(2) Description: Failure to adequately clean carbon out of F-553 during initial blow-over and first flush. Residual carbon then broke loose unexpectedly during second wash. Viol. Classification: Moderate Citation: 30 TAC Chapter 116, SubChapter B 116.115(b)(2)(F) 30 TAC Chapter 116, SubChapter B 116.115(c) 30 TAC Chapter 116, SubChapter B 116.116(a)(2) Description: Failure to maintain equipment. Tank F-786 off-spec line leaking due to increased pressure. Viol. Classification: Moderate Citation: 30 TAC Chapter 116, SubChapter B 116.115(b)(2)(F) 30 TAC Chapter 116, SubChapter B 116.115(c) 30 TAC Chapter 116, SubChapter B 116.116(a)(2) Description: Failure to maintain equipment. T-66 leaking from tower E-707 reboiler C-712.

Viol. Classification: Moderate

Citation: 30 TAC Chapter 116, SubChapter B 116.115(b)(2)(F) 30 TAC Chapter 116, SubChapter B 116.115(c) 30 TAC Chapter 116, SubChapter B 116.116(a)(2) Description: Failure to maintain equipment. Tank F-505 / pump J-616 piping system leak. Viol. Classification: Moderate 30 TAC Chapter 116, SubChapter B 116.115(b)(2)(F) Citation: 30 TAC Chapter 116, SubChapter B 116.115(c) 30 TAC Chapter 116, SubChapter B 116.116(a)(2) Description: Failure to maintain equipment. Vapor recovery system failure to allow adequate vapor flow during loading of a tankwagon at Loading Rack E resulting in emissions from tankwagon. Viol. Classification: Moderate Citation: 30 TAC Chapter 116, SubChapter B 116.115(b)(2)(F) 30 TAC Chapter 116, SubChapter B 116.115(c) 30 TAC Chapter 116, SubChapter B 116.116(a)(2) Description: Failure to maintain equipment. F-794 KO drum discharge line leaking. Viol. Classification: Moderate Citation: 30 TAC Chapter 116, SubChapter B 116.115(b)(2)(F) 30 TAC Chapter 116, SubChapter B 116.115(c) 30 TAC Chapter 116, SubChapter B 116.116(a)(2) Description: Failure to maintain equipment. Drum used to clean Packaging Plant screw conveyor leaked due to a hole caused by the conveyor puncturing side of drum allowing chemical to leak out. Viol. Classification: Moderate 30 TAC Chapter 116, SubChapter B 116.115(b)(2)(F) Citation: 30 TAC Chapter 116, SubChapter B 116.115(c) 30 TAC Chapter 116, SubChapter B 116.116(a)(2) Description: Failure to align valves properly during E-601 pressure control valve maintenance resulting in a spill that overflowed a collection bucket. Viol. Classification: Moderate Citation: 30 TAC Chapter 116, SubChapter B 116.115(b)(2)(F) 30 TAC Chapter 116, SubChapter B 116.115(c) 30 TAC Chapter 116, SubChapter B 116.116(a)(2) Description: Failure to maintain equipment. Tank F-320 level transmitter LT-357 has gasket leak. Viol. Classification: Moderate Citation: 30 TAC Chapter 116, SubChapter B 116.115(b)(2)(A) 30 TAC Chapter 116, SubChapter B 116.115(b)(2)(F) 30 TAC Chapter 116, SubChapter B 116.115(c) Description: Failure to maintain equipment. Release from flow gauge while unloading railcar of butylene. Viol. Classification: Moderate Citation: 30 TAC Chapter 116, SubChapter B 116.115(b)(2)(F) 30 TAC Chapter 116, SubChapter B 116.115(c) 30 TAC Chapter 116, SubChapter B 116.116(a)(2) Description: Failure to maintain equipment. Failure of PSV allowing release of vapor from tank F-613 during purge into tank. Viol. Classification: Moderate Citation: 30 TAC Chapter 116, SubChapter B 116.115(b)(2)(F) 30 TAC Chapter 116, SubChapter B 116.115(c) 30 TAC Chapter 116, SubChapter B 116.116(a)(2) Description: Failure to maintain equipment. Chemical released from pump J-802A suction strainer piping. Viol. Classification: Moderate Citation: 30 TAC Chapter 116, SubChapter B 116.115(b)(2)(F) 30 TAC Chapter 116, SubChapter B 116.115(c) 30 TAC Chapter 116, SubChapter B 116.116(a)(2) Description: Failure to maintain equipment. Valve Leakage at Tank F-322 sample valve. Viol. Classification: Moderate Citation: 30 TAC Chapter 116, SubChapter B 116.115(b)(2)(A) 30 TAC Chapter 116, SubChapter B 116.115(c) 30 TAC Chapter 116, SubChapter B 116.116(a)(2) Description: Failure to maintain equipment. Vacuum pump J-707 for tower E-705 had a 90° fitting on its discharge line leaking. Viol. Classification: Moderate Citation: 30 TAC Chapter 116, SubChapter B 116.115(b)(2)(F) 30 TAC Chapter 116, SubChapter B 116.115(c) 30 TAC Chapter 116, SubChapter B 116.116(a)(2) Description: Failure to maintain equipment. Control panel instrumentation in error. Allowed accumulator F-732 to

overfill and release through the vacuum pump. Viol. Classification: Moderate Citation: 30 TAC Chapter 116, SubChapter B 116.115(b)(2)(F) 30 TAC Chapter 116, SubChapter B 116.115(c) 30 TAC Chapter 116, SubChapter B 116.116(a)(2) Description: Failure to maintain equipment. Union in natural gas line to heater B-790 leaking and venting natural gas to atmosphere. Viol. Classification: Moderate 30 TAC Chapter 116, SubChapter B 116.115(b)(2)(F) Citation: 30 TAC Chapter 116, SubChapter B 116.115(c) 30 TAC Chapter 116, SubChapter B 116.116(a)(2) Description: Failure to maintain equipment. Chemical backed up into TF-0 N2 system causing release of emissions. Viol. Classification: Moderate 30 TAC Chapter 116, SubChapter B 116.115(b)(2)(F) Citation: 30 TAC Chapter 116, SubChapter B 116.115(c) 30 TAC Chapter 116, SubChapter B 116.116(a)(2) Description: Failure to remove all residual chemical from E-402 reboiler level instrument bridle due to design of piping. Residual chemical was released when bridle was unbolted for removal. Viol. Classification: Moderate Citation: 30 TAC Chapter 116, SubChapter B 116.115(b)(2)(F) 30 TAC Chapter 116, SubChapter B 116.115(c) 30 TAC Chapter 116, SubChapter B 116.116(a)(2) Description: Failure to maintain equipment. Tower E-660 SD reflux line leaked at gasket. Viol. Classification: Moderate Citation: 30 TAC Chapter 116, SubChapter B 116.115(b)(2)(F) 30 TAC Chapter 116, SubChapter B 116.115(c) 30 TAC Chapter 116, SubChapter B 116.116(a)(2) Failure to maintain equipment. Pin hole leak in Tank F-737 butylene discharge line at strainers. Description: Viol. Classification: Moderate Citation: 30 TAC Chapter 116, SubChapter B 116.115(b)(2)(F) 30 TAC Chapter 116, SubChapter B 116.115(c) 30 TAC Chapter 116, SubChapter B 116.116(a)(2) Description: Failure to check contents of roll-off prior to opening tailgate. Tarp had leaked allowing rain water to enter roll-off. When tailgate was opened, water exited with some residual resin from its previous contents. Viol. Classification: Moderate Citation: 30 TAC Chapter 116, SubChapter B 116.115(b)(2)(F) 30 TAC Chapter 116, SubChapter B 116.115(c) 30 TAC Chapter 116, SubChapter B 116.116(a)(2) Description: Failure to maintain equipment. Vapor recovery system not allowing adequate flow of vapors from tankwagon being loaded at Loading Rack C resulting in emissions from tankwagon. Viol. Classification: Moderate Citation: 30 TAC Chapter 116, SubChapter B 116.115(b)(2)(G) 30 TAC Chapter 116, SubChapter B 116.115(c) 30 TAC Chapter 116, SubChapter B 116.116(a)(2) Description: Failure to maintain tank F-743 at proper temperature. Increased temperature in tank possibly due to equipment failure. Potential leaks due to corrosion. Viol. Classification: Moderate Citation: 30 TAC Chapter 116, SubChapter B 116.115(b)(2)(F) 30 TAC Chapter 116, SubChapter B 116.115(c) 30 TAC Chapter 116, SubChapter B 116.116(a)(2) Description: Failure to maintan equipment. Tower E-503 sight glass gasket leak. Viol. Classification: Moderate Citation: 30 TAC Chapter 116, SubChapter B 116.115(b)(2)(F) 30 TAC Chapter 116, SubChapter B 116.115(c) 30 TAC Chapter 116, SubChapter B 116.116(a)(2) Description: Failure to maintain equipment. Vacuum pump J-707 discharge fitting (90°) leaking. Viol. Classification: Moderate Citation: 30 TAC Chapter 116, SubChapter B 116.115(b)(2)(F) 30 TAC Chapter 116, SubChapter B 116.115(c) 30 TAC Chapter 116, SubChapter B 116.116(a)(2) Description: Failure to maintain equipment. Dry disconnect fitting at LR-G leaking where it screws onto hose. Viol. Classification: Moderate Citation 30 TAC Chapter 116, SubChapter B 116.115(b)(2)(F) 30 TAC Chapter 116, SubChapter B 116.115(c) Page 10

30 TAC Chapter 116, SubChapter B 116.116(a)(2) Description: Failure to maintain equipment. Pump J-309 leaking under insulation. Viol. Classification: Moderate Citation: 30 TAC Chapter 116, SubChapter B 116.115(b)(2)(F) 30 TAC Chapter 116, SubChapter B 116.115(c) 30 TAC Chapter 116, SubChapter B 116.116(a)(2) Description: Failure to maintain equipment. Leak at Tank F-609 level transmitter. Viol. Classification: Moderate Citation: 30 TAC Chapter 116, SubChapter B 116.115(b)(2)(F) 30 TAC Chapter 116, SubChapter B 116.115(c) 30 TAC Chapter 116, SubChapter B 116.116(a)(2) Description: Failure to maintain equipment. Tank F-318 Emergency Pressure Vent (EPV) venting. Viol. Classification: Moderate Citation: 30 TAC Chapter 116, SubChapter B 116.115(b)(2)(F) 30 TAC Chapter 116, SubChapter B 116.115(c) 30 TAC Chapter 116, SubChapter B 116.116(a)(2) Description: Failure to maintain equipment. Valve leakage at Tower E-501 OH control valve station drain valve. Viol. Classification: Moderate Citation: 30 TAC Chapter 116, SubChapter B 116.115(b)(2)(F) 30 TAC Chapter 116, SubChapter B 116.115(c) 30 TAC Chapter 116, SubChapter B 116.116(a)(2) Description: Failure to maintain equipment. Valve body and pipe at pump J-1001 cracked and leaking. Viol. Classification: Moderate Citation: 30 TAC Chapter 116, SubChapter B 116.115(b)(2)(F) 30 TAC Chapter 116, SubChapter B 116.115(c) 30 TAC Chapter 116, SubChapter B 116.116(a)(2) Description: Failure to prevent Tank F-652 from emitting vapors to atmosphere while being filled from railcar. Viol. Classification: Moderate 30 TAC Chapter 116, SubChapter B 116.115(b)(2)(F) Citation: 30 TAC Chapter 116, SubChapter B 116.115(c) 30 TAC Chapter 116, SubChapter B 116.116(a)(2) Description: Failure to maintain equipment. Tank F-620 emitting vapors to atmosphere through Pressure Safety Valve (PSV). Viol. Classification: Moderate Citation: 30 TAC Chapter 116, SubChapter B 116.115(b)(2)(F) 30 TAC Chapter 116, SubChapter B 116.115(c) 30 TAC Chapter 116, SubChapter B 116.116(a)(2) Description: Failure to maintain equipment. Tank F-583 Pressure Safety Valve (PSV) opening and venting emissions to atmosphere. Viol. Classification: Moderate Citation: 30 TAC Chapter 116, SubChapter B 116.115(b)(2)(F) 30 TAC Chapter 116, SubChapter B 116.115(c) 30 TAC Chapter 116, SubChapter B 116.116(a)(2) Description: Failure to maintain equipment. Tank F-610 venting to atmosphere from Pressure Safety Valve (PSV) 622. Viol. Classification: Moderate Citation: 30 TAC Chapter 116, SubChapter B 116.115(b)(2)(A) 30 TAC Chapter 116, SubChapter B 116.115(b)(2)(F) 30 TAC Chapter 116, SubChapter B 116.115(c) Description: Failure to maintain equipment. Exchanger C-612 head gasket leaking. Viol. Classification: Moderate Citation: 30 TAC Chapter 116, SubChapter B 116.115(b)(2)(F) 30 TAC Chapter 116, SubChapter B 116.115(c) 30 TAC Chapter 116, SubChapter B 116.116(a)(2) Description: Failure to maintain equipment, Pressure Safety Valve (PSV) weeping. Viol. Classification: Moderate 30 TAC Chapter 116, SubChapter B 116.115(b)(2)(F) Citation: 30 TAC Chapter 116, SubChapter B 116.115(c) 30 TAC Chapter 116, SubChapter B 116.116(a)(2) Description: Failure to maintain equipment. Exchanger C-778 head leaking. Disclosure Date: 09/19/2018 Viol. Classification: Moderate Citation: 30 TAC Chapter 122, SubChapter B 122.143(4)

Description: Failure to submit accurate emissions inventories. It was discovered that past emission inventories are not complete, since they did not include paint operations and calculations.

Viol. Classification: Minor

Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)

30 TAC Chapter 116, SubChapter B 116.116(a)(2)

Description: Failure to maintain records to demonstrate that the trucks loaded are tested in accordance with SC 8, which requires each truck to have been certified under the provisions of 40 CFR 60, subpart XX or 49 CFR 180(h). Viol. Classification: Minor

- Citation: 30 TAC Chapter 115, SubChapter B 115.140 30 TAC Chapter 115, SubChapter B 115.142 30 TAC Chapter 115, SubChapter B 115.143 30 TAC Chapter 115, SubChapter B 115.144 30 TAC Chapter 115, SubChapter B 115.145 30 TAC Chapter 115, SubChapter B 115.146
  - 30 TAC Chapter 115, SubChapter B 115.147
  - 30 TAC Chapter 115, SubChapter B 115.148
  - 30 TAC Chapter 115, SubChapter B 115.149
- Description: Failure to document/confirm the exemption or comply with the wastewater system VOC control regulations. The plant discharges VOC-containing wastewater streams into the plant wastewater system. The facility maintains that it is exempt from the industrial wastewater VOC emission control requirements. Viol. Classification: Minor

Citation: 30 TAC Chapter 106, SubChapter K 106.263

30 TAC Chapter 106, SubChapter A 106.8

30 TAC Chapter 116, SubChapter B 116.116(d)

- Description: The facility does not have records of painting and dry abrasive blasting activity rate; related emission rates or documentation of authorization of air emissions from these activities.
- Viol. Classification: Minor

Citation: 30 TAC Chapter 101, SubChapter A 101.20

30 TAC Chapter 116, SubChapter B 116.115(c)

30 TAC Chapter 116, SubChapter B 116.116(a)(2)

- 40 CFR Chapter 60, SubChapter C, PT 60, SubPT A 60.18
- Description: Failure to maintain records demonstrating that the permitted flare systems X-401, X501, X-601, X-602, X-794, and X-695 are designed to meet the 40 CFR §60.18 specifications of minimum heating value and maximum tip velocity under normal, upset, and maintenance flow conditions.

Viol. Classification: Moderate

- Citation: 30 TAC Chapter 335, SubChapter C 335.69
- Description: Failure to manage hazardous wastes in satellite accumulation areas in accordance with state requirements. This includes hazardous waste was being transferred from one satellite accumulation area ("SAA") to another.

Viol. Classification: Moderate

Citation: 30 TAC Chapter 335, SubChapter C 335.69

Description: Failure to manage waste accumulation time. According to weekly hazardous waste storage inspections, one drum of hazardous waste was retained for longer than 90 days (accumulation start date was 5/2/16 and drum was picked up on 8/4/16).

Viol. Classification: Moderate

Citation: 30 TAC Chapter 335, SubChapter H 335.261

- Description: Failure to properly label boxes containing Universal Waste Lamps. Boxes and the bundle of universal waste lamps were only labeled with the accumulation start date and not with the words "Universal Waste Lamps." Viol. Classification: Minor
- Citation: 30 TAC Chapter 305, SubChapter F 305.128
- Description: Failure to submit documentation to TCEQ to notify the agency of the delegation of authority for certain individuals to submit Discharge Monitoring Reports.
- Viol. Classification: Moderate

Citation: 30 TAC Chapter 101, SubChapter A 101.20

30 TAC Chapter 122, SubChapter B 122.143(4)

- 30 TAC Chapter 122, SubChapter B 122.144
- 40 CFR Chapter 60, SubChapter C, PT 60, SubPT A 60.18
- 40 CFR Chapter 60, SubChapter C, PT 60, SubPT NNN 60.663(b)(2)
- 40 CFR Chapter 60, SubChapter C, PT 60, SubPT NNN 60.665(d)
- Description: Failure to provide evidence of compliance with the flow indication requirements of 40 CFR Part 60 Subpart NNN for emissions units E-501, E-502, E-503, E-707, E-708, and E- 709, or documentation supporting the claim that this regulation is not applicable to the mentioned emissions units identified in permit 01431.

Viol. Classification: Moderate

Citation: 30 TAC Chapter 122, SubChapter B 122.143(4) 30 TAC Chapter 122, SubChapter B 122.144 Description: Distillation units E-660 and E-670 were not equipped with individual flow indicators in the vent streams to the flare; flows to the flare were measured on the combined stream, with individual flows evaluated based on temperature and pressure in each distillation unit. Viol. Classification: Moderate Citation: 30 TAC Chapter 115, SubChapter B 115.116(a)(2) 30 TAC Chapter 115, SubChapter B 115.125(3)(A) 30 TAC Chapter 115, SubChapter B 115.125(3)(C) 30 TAC Chapter 115, SubChapter B 115.125(3)(E) 30 TAC Chapter 116, SubChapter B 116.115(c) 30 TAC Chapter 116, SubChapter B 116.116(a)(2) Description: Failure to demonstrate that Flares were in compliance with 40 CFR 60.18(b) requirements. Viol. Classification: Minor Citation: 30 TAC Chapter 115, SubChapter B 115.126(3)(B) Description: Failure to maintain records of the daily combined weight of VOC to demonstrate that vacuum systems at the facility are exempt from the cited regulation. Viol. Classification: Minor Citation: 30 TAC Chapter 116, SubChapter B 116.115(c) 30 TAC Chapter 116, SubChapter B 116.116(a)(2) Description: Failure to maintain a list of VOC containing equipment excluded from fugitive emissions monitoring based on VOC aggregate partial pressure less than 0.044 psia at 68 degrees Fahrenheit. Viol. Classification: Minor 30 TAC Chapter 115, SubChapter C 115.216(3)(B) Citation: Description: Failure to maintain records of vapor pressure for VOC loading, or evidence that loading rate is less than 20.000 gallons per day averaged over 30 consecutive days. Viol. Classification: Moderate Citation: 30 TAC Chapter 101, SubChapter A 101.10 30 TAC Chapter 106, SubChapter K 106.263 30 TAC Chapter 116, SubChapter B 116.110(a)(4) 30 TAC Chapter 116, SubChapter B 116.115(c) Description: Failure to manage depressurization and VOC concentrations measurements during maintenance activities. Specifically, when conducting maintenance activities on equipment in VOC service where the TVP is > 0.5psia. depressurization to a closed system or controls until the VOC concentration is below 1.000 ppmv (pressure vessels only). 10.000 ppmv. or 10% of the LEL cannot alwavs be confirmed. Viol. Classification: Moderate 30 TAC Chapter 101, SubChapter A 101.20 Citation: Description: Failure to designate process Plants 5 and 7 as subject to Subpart NNN in Title V permit and meet the compliance obligations of this regulation for these process areas. Viol. Classification: Moderate Citation: 30 TAC Chapter 115, SubChapter D 115.355(1) 30 TAC Chapter 116, SubChapter B 116.115(b)(2)(D) 30 TAC Chapter 116, SubChapter B 116.115(b)(2)(H) 30 TAC Chapter 116, SubChapter B 116.115(c) 30 TAC Chapter 116, SubChapter B 116.116(a)(2) Description: Failure to quantify rolling 12-month annual emissions. Specifically, records demonstrating compliance with annual MAERT limits monthly on a rolling 12-month basis was not available. Viol. Classification: Moderate Citation: 30 TAC Chapter 116, SubChapter B 116.115(b)(2)(E) 30 TAC Chapter 116, SubChapter B 116.115(b)(2)(F) 30 TAC Chapter 116, SubChapter B 116.115(c) 30 TAC Chapter 116, SubChapter B 116.116(a)(2) Description: Failure to meet all the requirements of Method 21. Specifically, Ad hoc LDAR monitoring conducted using the Industrial Scientific iBRID MX6 multi-gas detector does not meet all the requirements of Method 21. Viol. Classification: Moderate Citation: 30 TAC Chapter 115, SubChapter D 115.352(2) 30 TAC Chapter 115, SubChapter D 115.356(1)(D) 30 TAC Chapter 116, SubChapter B 116.115(b)(2)(H) 30 TAC Chapter 116, SubChapter B 116.115(c) 30 TAC Chapter 116, SubChapter B 116.116(a) Description: Failure to provide a sufficient explanation for why a unit shutdown is required to repair certain components on delay of repair (DOR) list. Viol. Classification: Moderate

30 TAC Chapter 115, SubChapter D 115.352(2)(C)
 30 TAC Chapter 122, SubChapter B 122.143(4)

Citation:

30 TAC Chapter 122, SubChapter B 122.144

Description: Failure to review Delay of Repair (DOR) list. Specifically, two compressor seals on the DOR list for over two years, beyond the six months allowed by applicable regulations.

Viol. Classification: Major Citation: 30 TAC Chapter

30 TAC Chapter 115, SubChapter D 115.356(3)(C)

30 TAC Chapter 116, SubChapter B 116.115(c)

30 TAC Chapter 116, SubChapter B 116.116(a)(2)

30 TAC Chapter 122, SubChapter B 122.143(4)

30 TAC Chapter 122, SubChapter B 122.144

Description: Failure to obtain authorization and/or exemption for all OELs al the facility.

Viol. Classification: Moderate Citation: 30 TAC Chapter 1

30 TAC Chapter 117, SubChapter B 117.340(j)

30 TAC Chapter 122, SubChapter B 122.143(4)

30 TAC Chapter 122, SubChapter B 122.144

40 CFR Chapter 63, SubChapter C, PT 63, SubPT ZZZZ 63.6625(f)

40 CFR Chapter 63, SubChapter C, PT 63, SubPT ZZZZ 63.6655(f)

Description: Failure to ensure runtime meters were accurately tracking the hours of operation on two emergency-only diesel-fired internal combustion engines used for the firewater pumps (J-517, J517A).

Viol. Classification: Moderate

Citation: 30 TAC Chapter 117, SubChapter B 117.340(j)

30 TAC Chapter 122, SubChapter B 122.143(4)

30 TAC Chapter 122, SubChapter B 122.144

40 CFR Chapter 63, SubChapter C, PT 63, SubPT ZZZZ 63.6625(f)

40 CFR Chapter 63, SubChapter C, PT 63, SubPT ZZZZ 63.6655(f)

Description: Failure to ensure runtime meters were accurately tracking the hours of operation on these two diesel-fired internal combustion engines used for the emergency wastewater pumps (J-522A, J-522B).

Viol. Classification: Moderate

Citation: 30 TAC Chapter 117, SubChapter B 117.340(j)

Description: Failure to ensure runtime meters were accurately tracking the hours of operation on these two emergency -only natural gas-fired internal combustion engines used for electricity generation (EG-500, EG-500A). Viol. Classification: Moderate

Citation: 30 TAC Chapter 115, SubChapter B 115.161 30 TAC Chapter 115, SubChapter B 115.166

Description: Failure to maintain records and implement required monitoring and testing. Specifically, the site has not conducted a vent-specific applicability

assessment for the batch process vent regulations in 30 TAC Chapter 115. Subchapter D. Division 6 (Plant 3, 4, and 8).

Viol. Classification: Moderate

Citation: 30 TAC Chapter 122, SubChapter B 122.132(d)(2) 30 TAC Chapter 122, SubChapter B 122.132(d)(3)

Description: Failure to include Regulation 115 applicable requirements for batch process vents in Title V permit (Plant 3, 4, and 8).

Viol. Classification: Major

Citation: 30 TAC Chapter 122, SubChapter B 122.122

Description: Failure to include two gas-fired generators to the Title V permit (EG-500, EG-500A).

Viol. Classification: Moderate

Citation: 30 TAC Chapter 116, SubChapter B 116.115(b)(2)(C) 30 TAC Chapter 116, SubChapter B 116.115(b)(2)(F)

30 TAC Chapter 116, SubChapter B 116.116(a)(2)

Description: Failure to prevent VOC emissions. Specifically, steam bayonet manway gasket failed and was leaking on F-566 accumulator into secondary containment.

Viol. Classification: Moderate

Citation: 30 TAC Chapter 116, SubChapter B 116.115(b)(2)(F) 30 TAC Chapter 116, SubChapter B 116.115(c)

30 TAC Chapter 116, SubChapter B 116.116(a)(2)

Description: Failure to prevent unauthorized VOC emissions. Specifically, pressure safety valve (PSV) on heater B-701 lifted and released heat transfer fluid into secondary containment.

Viol. Classification: Moderate

Citation: 30 TAC Chapter 116, SubChapter B 116.115(b)(2)(F)

30 TAC Chapter 116, SubChapter B 116.115(c)

30 TAC Chapter 116, SubChapter B 116.116(a)(2)

Description: Failure to prevent unauthorized VOC emissions. Specifically, spent carbon from the carbon absorption unit was released to secondary

containment while F-5S0 was emptied for welding.

Viol. Classification: Moderate

30 TAC Chapter 116, SubChapter B 116.115(b)(2)(F) Citation: 30 TAC Chapter 116, SubChapter B 116.115(c) 30 TAC Chapter 116, SubChapter B 116.116(a)(2) Description: Failure to prevent unauthorized VOC emissions. Specifically, bucket used to collect drips from sample point on J-732A from overflowing releasing minor amounts of chemicals and rain water to secondary containment. Viol. Classification: Moderate Citation: 30 TAC Chapter 116, SubChapter B 116.115(b)(2)(F) 30 TAC Chapter 116, SubChapter B 116.115(c) 30 TAC Chapter 116, SubChapter B 116.116(a)(2) Description: Failure to prevent unauthorized VOC emissions. Specifically, pressure Safety Valve (PSV)-143 malfunctioned during a high pressure changeover and released chemical to secondary containment. Viol. Classification: Moderate Citation: 30 TAC Chapter 116, SubChapter B 116.115(b)(2)(F) 30 TAC Chapter 116, SubChapter B 116.115(c) 30 TAC Chapter 116, SubChapter B 116.116(a)(2) Description: Failure to prevent unauthorized VOC emissions. Specifically, exchanger C-613 gasket failed causing leak into secondary containment. Viol. Classification: Moderate Citation: 30 TAC Chapter 116, SubChapter B 116.115(b)(2)(F) 30 TAC Chapter 116, SubChapter B 116.115(c) 30 TAC Chapter 116, SubChapter B 116.116(a)(2) Description: Failure to prevent unauthorized VOC emissions. Specifically, Chemical leaked into secondary containment from pin hole in weld for pressure gauge on discharge piping of pump J404A.. Viol. Classification: Moderate Citation: 30 TAC Chapter 116, SubChapter B 116.115(b)(2)(F) 30 TAC Chapter 116, SubChapter B 116.115(c) 30 TAC Chapter 116, SubChapter B 116.116(a)(2) Description: Failure to prevent unauthorized VOC emissions. Specifically, pump J-701A discharge piping was leaking into secondary containment when residual crude became trapped between pump and discharge valve causing high pressure. Viol. Classification: Moderate 30 TAC Chapter 116, SubChapter B 116.115(b)(2)(F) Citation: 30 TAC Chapter 116, SubChapter B 116.115(c) 30 TAC Chapter 116, SubChapter B 116.116(a)(2) Description: Failure to prevent unauthorized VOC emissions. Specifically, gasket on PF-67()A/B strainers leaking into secondary containment due to gasket failure. Disclosure Date: 10/03/2018 Viol. Classification: Moderate Citation: 30 TAC Chapter 122, SubChapter B 122.143(4) 30 TAC Chapter 122, SubChapter B 122.144 Description: Failure to maintain records of difficult to monitor components and monitoring events. Notice of Intent Date: 01/10/2019 (1538876) Disclosure Date: 03/25/2019 Viol. Classification: Moderate 30 TAC Chapter 122, SubChapter B 122.143 Citation: 30 TAC Chapter 122, SubChapter B 122.144 Description: Failure to conduct self-diagnostic check for two vent gas flowmeters. Viol. Classification: Moderate Citation: 30 TAC Chapter 122, SubChapter B 122.143 30 TAC Chapter 122, SubChapter B 122.144 Description: Failure to maintain records of calibration for two natural gas flowmeters for years 2014, 2015, 2016, 2017, and 2018. (Unit X-501) Viol. Classification: Minor Citation: 30 TAC Chapter 122, SubChapter B 122.143 30 TAC Chapter 122, SubChapter B 122.144 Description: Failure to maintain records of self diagnostics for two vent gas flowmeters for years 2014, 2015, 2016, 2017, and 2018. (Unit X-501) Viol. Classification: Moderate

Citation: 30 TAC Chapter 122, SubChapter B 122.143 30 TAC Chapter 122, SubChapter B 122.144 30 TAC Chapter 122, SubChapter B 122.145

Description: Failure to include deviations for Unit X-501 in prior deviation reports.

Viol. Classification: Moderate Citation: 30 TAC Chapter 122, SubChapter B 122.143 30 TAC Chapter 122, SubChapter B 122.144 30 TAC Chapter 122, SubChapter B 122.145 Description: Failure to include loading side natural gas flowmeter operation deviation in deviation report. Loading side natural gas flowmeter was not operating 7/6/2018 through 9/12/218. Viol. Classification: Moderate Citation: 30 TAC Chapter 106, SubChapter K 106.262 30 TAC Chapter 122, SubChapter B 122.143 30 TAC Chapter 122, SubChapter B 122.144 Description: Failure to submit notification of fugitive components within 10 days as required by 106.262. Viol. Classification: Moderate Citation: 30 TAC Chapter 122, SubChapter B 122.143 30 TAC Chapter 122, SubChapter B 122.144 Description: Failure to report control tank operating temperature deviations (Violation No.14 in table) on prior deviation report. Viol. Classification: Moderate 30 TAC Chapter 122, SubChapter B 122.143 Citation: 30 TAC Chapter 122, SubChapter B 122.144 Description: Failure to maintain uncontrolled tank operating temperatures and/or throughputs for certain tanks. At times tank temperatures and/or throughputs are higher than represented. Viol. Classification: Moderate Citation: 30 TAC Chapter 122, SubChapter B 122.143 30 TAC Chapter 122, SubChapter B 122.144 30 TAC Chapter 122, SubChapter B 122.145 Description: Failure to report deviation for failing to maintain uncontrolled tank operating temperatures and/or throughputs for certain tanks. Viol. Classification: Moderate 30 TAC Chapter 122, SubChapter B 122.143 Citation: 30 TAC Chapter 122, SubChapter B 122.144 Description: Failure to continuously monitor temperature for tank F-414. Viol. Classification: Moderate 30 TAC Chapter 122, SubChapter B 122.143 Citation: 30 TAC Chapter 122, SubChapter B 122.144 Description: Failure to conduct daily analysis for listed compounds associated with F-1001 Wastewater tank. Viol. Classification: Moderate Citation: 30 TAC Chapter 122, SubChapter B 122.143 30 TAC Chapter 122, SubChapter B 122.144 Description: Failure to conduct weekly visible emission observations for Baghouse. Disclosure Date: 11/18/2019 Viol. Classification: Moderate Citation: 30 TAC Chapter 116, SubChapter B 116.115(b)(2)(E) 30 TAC Chapter 116, SubChapter B 116.115(c) 30 TAC Chapter 116, SubChapter B 116.116(a)(2) 30 TAC Chapter 122, SubChapter B 122.122(b) Description: Failure to route MSS emissions to a control device identified on the MAERT (X-601). Notice of Intent Date: 01/22/2021 (1702410) Disclosure Date: 03/22/2021 Viol. Classification: Moderate Citation: 30 TAC Chapter 116, SubChapter B 116.115(b)(2)(E) 30 TAC Chapter 116, SubChapter B 116.115(c) 30 TAC Chapter 116, SubChapter B 116.116(a)(2) Description: Failure to maintain addition and records of 0.43 scf of assist gas per scf of total gas to the air assisted flare during planned MSS activities (X-602) Viol. Classification: Minor Citation: 30 TAC Chapter 116, SubChapter B 116.115(b)(2)(E) 30 TAC Chapter 116, SubChapter B 116.115(c) 30 TAC Chapter 116, SubChapter B 116.116(a)(2) Description: Failure to maintain records of degreaser inspections to ensure compliance with 30 TAC 115.412(1)(A)-(F). Viol. Classification: Moderate 30 TAC Chapter 116, SubChapter B 116.115(b)(2)(E) Citation: 30 TAC Chapter 116, SubChapter B 116.115(c) 30 TAC Chapter 116, SubChapter B 116.116(c)

Description: Failure to tag components leaking fugitives in excess of 500 ppmv, found to be leaking by visual inspection, or placed on the Delay of Repair list. Viol. Classification: Moderate Citation: 30 TAC Chapter 116, SubChapter B 116.115(b)(2)(E) 30 TAC Chapter 116, SubChapter B 116.115(c) 30 TAC Chapter 116, SubChapter B 116.116(a)(2) Description: Failure to determine emissions by multiplying the total cooling water mass flow between cooling water monitoring periods by the higher of the 2 VOC monitored results (Cooling Towers, W-501, W-502, W-503) Viol. Classification: Moderate Citation: 30 TAC Chapter 116, SubChapter B 116.115(b)(2)(E) 30 TAC Chapter 116, SubChapter B 116.115(c) 30 TAC Chapter 116, SubChapter B 116.116(a)(2) Description: Failure to determine rolling-12 month cooling tower PM emissions from sum of hourly emissions (Cooling towers, W-501, W-502, and W-503). Viol. Classification: Moderate Citation: 30 TAC Chapter 116, SubChapter B 116.115(b)(2)(E) 30 TAC Chapter 116, SubChapter B 116.115(c) 30 TAC Chapter 116, SubChapter B 116.116(a)(2) Description: Failure to maintain records of MSS activities used to determine emissions. Viol. Classification: Moderate Citation: 30 TAC Chapter 122, SubChapter B 122.122 30 TAC Chapter 122, SubChapter B 122.140 30 TAC Chapter 122, SubChapter B 122.142 Description: Failure to properly represent the replacement chemical hotbox is in the permit application (Chemical Hotbox). Viol. Classification: Moderate Citation: 30 TAC Chapter 116, SubChapter B 116.110(a) 30 TAC Chapter 122, SubChapter B 122.122 30 TAC Chapter 122, SubChapter B 122.140 30 TAC Chapter 122, SubChapter B 122.142 Description: Failure to represent Painting and Abrasive blasting operations emissions in permit. Disclosure Date: 03/29/2021 Viol. Classification: Moderate Citation: 30 TAC Chapter 115, SubChapter D 115.356(3)(C) 30 TAC Chapter 122, SubChapter B 122.143 30 TAC Chapter 122, SubChapter B 122.144 Description: Failure to identify and record the exempted heavy and ultra-heavy fugitive components. Viol. Classification: Minor 30 TAC Chapter 122, SubChapter B 122.144 Citation: Description: Failure to maintain records for degreaser inspections Disclosure Date: 05/04/2021 Viol. Classification: Moderate Citation: 30 TAC Chapter 115, SubChapter D 115.352 40 CFR Chapter 60, SubChapter C, PT 60, SubPT VV 60.482-1 40 CFR Part 60, Subpart VV 60.482-6 40 CFR Chapter 60, SubChapter C, PT 60, SubPT RRR 60.703 Description: Failure to cap open ended lines. Specifically, a review of closed vent systems discovered regulated open-ended lines without blinds or caps. Viol. Classification: Moderate Citation: 30 TAC Chapter 101, SubChapter A 101.20 Description: Failure to install car seals and key configuration. Specifically, Lines to atmosphere are closed with a single valve and not equipped with a flow indicator at the entrance to the line and/or are not equipped with a car seal or lock and key configuration. Notice of Intent Date: 08/13/2021 (1755237) No DOV Associated Notice of Intent Date: 05/06/2022 (1817394) No DOV Associated

- G. Type of environmental management systems (EMSs):  $_{\mbox{N/A}}$
- H. Voluntary on-site compliance assessment dates:  $$\rm N/A$$
- I. Participation in a voluntary pollution reduction program: \$N/A\$
- J. Early compliance:

N/A

## Sites Outside of Texas:

N/A

# **Component Appendices**

## Appendix A All NOVs Issued During Component Period 12/1/2017 and 12/1/2022

1	Date: 05/	/31/2018 (1508531)			
	Self Report? Citation:	YES	Classification:	Moderate	
	Description:	2D TWC Chapter 26, SubChapter A 26.121 30 TAC Chapter 305, SubChapter F 305.12 Failure to meet the limit for one or more pe	25(1)		
2	Date: 06, Self Report?	/30/2018 (1514861) YES	Classification:	Moderate	
	Citation:	2D TWC Chapter 26, SubChapter A 26.121		Moderate	
	Description:	30 TAC Chapter 305, SubChapter F 305.12 Failure to meet the limit for one or more pe	25(1)		
3	Date: 07,	/31/2018 (1520915)			
	Self Report? Citation:	YES	Classification:	Moderate	
		2D TWC Chapter 26, SubChapter A 26.121 30 TAC Chapter 305, SubChapter F 305.12			
	Description:	Failure to meet the limit for one or more pe	ermit parameter		
4	Date: 09/	/30/2018 (1534439)			
	Self Report? Citation:	YES	Classification:	Moderate	
		2D TWC Chapter 26, SubChapter A 26.121 30 TAC Chapter 305, SubChapter F 305.12	25(1)		
	Description:	Failure to meet the limit for one or more pe	ermit parameter		
	Date: 02/08/2019 (1517608)				
5	Date: 02/	/08/2019 (1517608)			
5	Date: 02/ Self Report? Citation:	NO	Classification:	Minor	
5	Self Report?	NO 30 TAC Chapter 116, SubChapter B 116.11 30 TAC Chapter 122, SubChapter B 122.14	15(c) 13(4)		
5	Self Report?	NO 30 TAC Chapter 116, SubChapter B 116.11 30 TAC Chapter 122, SubChapter B 122.14 40 CFR Chapter 60, SubChapter C, PT 60, 5 5C THSC Chapter 382 382.085(b) Special Condition 4B PA	15(c) 13(4)		
5	Self Report?	NO 30 TAC Chapter 116, SubChapter B 116.11 30 TAC Chapter 122, SubChapter B 122.14 40 CFR Chapter 60, SubChapter C, PT 60, 5 5C THSC Chapter 382 382.085(b)	15(c) 13(4) SubPT A 60.18(c)(	2)	
5	Self Report? Citation:	NO 30 TAC Chapter 116, SubChapter B 116.11 30 TAC Chapter 122, SubChapter B 122.14 40 CFR Chapter 60, SubChapter C, PT 60, 5 5C THSC Chapter 382 382.085(b) Special Condition 4B PA Special Term & Condition 1A and 11 OP Failure to continuously monitor the pilot flat NO	L5(c) 43(4) SubPT A 60.18(c)( ame (Category C1) Classification:	2)	
5	Self Report? Citation: Description: Self Report?	NO 30 TAC Chapter 116, SubChapter B 116.11 30 TAC Chapter 122, SubChapter B 122.14 40 CFR Chapter 60, SubChapter C, PT 60, 5 5C THSC Chapter 382 382.085(b) Special Condition 4B PA Special Term & Condition 1A and 11 OP Failure to continuously monitor the pilot fla NO 30 TAC Chapter 115, SubChapter D 115.35 30 TAC Chapter 122, SubChapter B 122.14 5C THSC Chapter 382 382.085(b)	15(c) 13(4) SubPT A 60.18(c)( ame (Category C1) Classification: 56(2)(E)	2)	
5	Self Report? Citation: Description: Self Report? Citation: Description:	NO 30 TAC Chapter 116, SubChapter B 116.11 30 TAC Chapter 122, SubChapter B 122.14 40 CFR Chapter 60, SubChapter C, PT 60, S 5C THSC Chapter 382 382.085(b) Special Condition 4B PA Special Term & Condition 1A and 11 OP Failure to continuously monitor the pilot fla NO 30 TAC Chapter 115, SubChapter D 115.35 30 TAC Chapter 122, SubChapter B 122.14 5C THSC Chapter 382 382.085(b) Special Term & Condition 1A OP Failure to maintain repair attempt records	L5(c) H3(4) SubPT A 60.18(c)( Arme (Category C1) Classification: 56(2)(E) H3(4) for fugitive compo	2) Minor nents (Category C3).	
5	Self Report? Citation: Description: Self Report? Citation:	NO 30 TAC Chapter 116, SubChapter B 116.11 30 TAC Chapter 122, SubChapter B 122.14 40 CFR Chapter 60, SubChapter C, PT 60, S 5C THSC Chapter 382 382.085(b) Special Condition 4B PA Special Term & Condition 1A and 11 OP Failure to continuously monitor the pilot fla NO 30 TAC Chapter 115, SubChapter D 115.35 30 TAC Chapter 122, SubChapter B 122.14 5C THSC Chapter 382 382.085(b) Special Term & Condition 1A OP Failure to maintain repair attempt records TNO	L5(c) H3(4) SubPT A 60.18(c)( Arme (Category C1) Classification: 56(2)(E) H3(4) for fugitive compo Classification:	2) Minor	
5	Self Report? Citation: Description: Self Report? Citation: Description: Self Report?	NO 30 TAC Chapter 116, SubChapter B 116.11 30 TAC Chapter 122, SubChapter B 122.14 40 CFR Chapter 60, SubChapter C, PT 60, S 5C THSC Chapter 382 382.085(b) Special Condition 4B PA Special Term & Condition 1A and 11 OP Failure to continuously monitor the pilot fla NO 30 TAC Chapter 115, SubChapter D 115.35 30 TAC Chapter 122, SubChapter B 122.14 5C THSC Chapter 382 382.085(b) Special Term & Condition 1A OP Failure to maintain repair attempt records T NO 30 TAC Chapter 116, SubChapter B 116.11 30 TAC Chapter 122, SubChapter B 122.14 5C THSC Chapter 382 382.085(b) Special Condition 4D PA	L5(c) H3(4) SubPT A 60.18(c)( Ame (Category C1) Classification: 56(2)(E) H3(4) for fugitive compose Classification: L5(c)	2) Minor nents (Category C3).	
5	Self Report? Citation: Description: Self Report? Citation: Description: Self Report?	NO 30 TAC Chapter 116, SubChapter B 116.11 30 TAC Chapter 122, SubChapter B 122.14 40 CFR Chapter 60, SubChapter C, PT 60, S 5C THSC Chapter 382 382.085(b) Special Condition 4B PA Special Term & Condition 1A and 11 OP Failure to continuously monitor the pilot fla NO 30 TAC Chapter 115, SubChapter D 115.35 30 TAC Chapter 122, SubChapter B 122.14 5C THSC Chapter 382 382.085(b) Special Term & Condition 1A OP Failure to maintain repair attempt records TNO 30 TAC Chapter 116, SubChapter B 116.11 30 TAC Chapter 122, SubChapter B 122.14 5C THSC Chapter 382 382.085(b)	L5(c) H3(4) SubPT A 60.18(c)( Ame (Category C1) Classification: 56(2)(E) H3(4) for fugitive compose Classification: L5(c) H3(4)	2) Minor nents (Category C3). Minor	
5	Self Report? Citation: Description: Self Report? Citation: Description: Self Report? Citation:	NO 30 TAC Chapter 116, SubChapter B 116.11 30 TAC Chapter 122, SubChapter B 122.14 40 CFR Chapter 60, SubChapter C, PT 60, S 5C THSC Chapter 382 382.085(b) Special Condition 4B PA Special Term & Condition 1A and 11 OP Failure to continuously monitor the pilot fla NO 30 TAC Chapter 115, SubChapter D 115.35 30 TAC Chapter 122, SubChapter B 122.14 5C THSC Chapter 382 382.085(b) Special Term & Condition 1A OP Failure to maintain repair attempt records T NO 30 TAC Chapter 116, SubChapter B 116.11 30 TAC Chapter 122, SubChapter B 122.14 5C THSC Chapter 122, SubChapter B 122.14 5C THSC Chapter 122, SubChapter B 122.14 5C THSC Chapter 120, SubChapter B 122.14 5C THSC Chapter 116, SubChapter B 122.14 5C THSC Chapter 120, SubChapter B 120.14 5C THSC Chapter 120, S	L5(c) H3(4) SubPT A 60.18(c)( Ame (Category C1) Classification: 56(2)(E) H3(4) for fugitive compose Classification: L5(c) H3(4)	2) Minor nents (Category C3). Minor	

<b>D</b>	5C THSC Chapter 382 382.085(b) Special Condition 4D PA Special Term & Condition 11 OP					
Description:	Failure to prevent an exceedance of the w (EPN PX501) (Category B18(g)(1)).	-				
Self Report? Citation:	NO	Classification:	Minor			
	30 TAC Chapter 122, SubChapter B 122.1 30 TAC Chapter 122, SubChapter B 122.1 5C THSC Chapter 382 382.085(b) General Terms & Conditions OP	45(2)(A)				
Description: Self Report?	Failure to report all deviations (Category E NO	Classification:	Minor			
Citation:	30 TAC Chapter 122, SubChapter B 122.1 30 TAC Chapter 122, SubChapter B 122.1 5C THSC Chapter 382 382.085(b) General Terms & Conditions OP	45(2)(A)				
Description: Self Report? Citation:	Failure to report all deviations (Category E NO	33). Classification:	Minor			
	30 TAC Chapter 122, SubChapter B 122.1 30 TAC Chapter 122, SubChapter B 122.1 5C THSC Chapter 382 382.085(b) General Terms & Conditions OP	45(2)(A)				
Description:	Failure to report all deviations (Category E					
Self Report? Citation:		Classification:	Minor			
	30 TAC Chapter 115, SubChapter E 115.4 30 TAC Chapter 122, SubChapter B 122.1 Periodic Monitoring Summary OP Special Term & Condition 10 OP					
Description: Self Report?	Failure to conduct monthly visual inspection	on for degreaser (C Classification:	ategory C1). Minor			
Citation:	30 TAC Chapter 115, SubChapter D 115.3 30 TAC Chapter 122, SubChapter B 122.1 40 CFR Chapter 60, SubChapter C, PT 60,	43(4)	b)(1)			
<b>D</b>	5C THSC Chapter 382 382.085(b) Special Term & Condition 1A OP					
Description: Self Report?	Failure to attach a leak tag on a component NO	nt (Category C3). Classification:	Moderate			
Citation:						
	30 TAC Chapter 116, SubChapter B 116.1 30 TAC Chapter 122, SubChapter B 122.1 5C THSC Chapter 382 382.085(b) Special Term & Condition 11 OP					
Description:	Failure to comply with permit representati (Category B17).	on for vent gas to	a control device			
Self Report? Citation:	NO	Classification:	Moderate			
	30 TAC Chapter 116, SubChapter B 116.1 30 TAC Chapter 122, SubChapter B 122.1 5C THSC Chapter 382 382.085(b) Special Term & Condition 11 OP					
Description:	Failure to comply with permit representati	on for multiple tan	ks (Category B17).			
Date: 06/	30/2019 (1593990)					
Self Report? Citation:	YES	Classification:	Moderate			
Description:	2D TWC Chapter 26, SubChapter A 26.12 30 TAC Chapter 305, SubChapter F 305.1 Failure to meet the limit for one or more p	25(1)				
Date: 09/30/2019 (1614055)						
Self Report?	YES	Classification:	Moderate			

Citation:		Chapter 26, SubCh Chapter 305, SubCh			
Description:	Failure	to meet the limit for	one or more pe	ermit parameter	
Date: 03,	/31/2020	(1654339)			
Self Report? Citation:	YES			Classification:	Moderate
Deceminations	30 TAC	Chapter 26, SubChapter 305, SubChapter 305, SubCh	apter F 305.12	5(1)	
Description:	Fallure	to meet the limit for		ernit parameter	
Date: 08,	/31/2020	(1592472)			
Self Report? Citation:	NO			Classification:	Moderate
	30 TAC 5C THS Special Special	Chapter 116, SubCh Chapter 122, SubCh C Chapter 382 382.0 Condition 4D PERMI Term & Condition 1	apter B 122.14 185(b) T . OP	3(4)	
Description:		to maintain a fuel ga EPN: PX501). (Cate <u>c</u>		n of 28% in the ve	ent stream for Flare
Self Report? Citation:	NO			Classification:	Minor
	5C THS Special	Chapter 122, SubCh C Chapter 382 382.0 Term & Condition 34	085(b) A(iii)(1) OP		
Description:		to conduct quarterly Pump J-522A (EPN: F			the Wastewater
Self Report? Citation:	NO			Classification:	Moderate
Description:	30 TAC 5C THS Special Special	Chapter 116, SubCh Chapter 122, SubCh C Chapter 382 382.0 Condition 19 PERMIT Term & Condition 11 to maintain Baghous	apter B 122.14 185(b) Г . OP	3(4)	emperature below the
Self Report?	limit. (C	Category C4)		Classification:	
Citation:	NO				Minor
Description:	5C THS Periodic Special		985(b) 79 OP 9 OP		Init ID: DEGREASE).
Self Report? Citation:	NO			Classification:	Minor
	30 TAC 30 TAC 40 CFR 5C THS Special Special Special	Chapter 111, SubCh Chapter 116, SubCh Chapter 122, SubCh Chapter 60, SubCha C Chapter 382 382.0 Condition14(C) PERI Term & Condition 11 Term & Condition 14	apter B 116.11 apter B 122.14 pter C, PT 60, 9 185(b) MIT OP OP	5(c) 3(4) SubPT A 60.18(c)	
Description:		to prevent Flare X-60 during a two hour p			or more than five
Self Report? Citation:	NO			Classification:	Moderate
	30 TAC 30 TAC 40 CFR 5C THS Special Special	Chapter 111, SubCh Chapter 116, SubCh Chapter 122, SubCh Chapter 60, SubCha C Chapter 382 382.0 Condition 14(C) PER Term & Condition 11 Term & Condition 14	apter B 116.11 apter B 122.14 pter C, PT 60, 9 85(b) MIT . OP	5(c) -3(4)	(1)
			Dege 01		

Description:	Failure to prevent Flare X-695 (EPN: P600) minutes during a two hour period. (Catego NO		or more than five Moderate
Self Report? Citation:	NO	Classification:	Moderate
Description:	30 TAC Chapter 116, SubChapter B 116.11 30 TAC Chapter 116, SubChapter B 116.11 30 TAC Chapter 122, SubChapter B 122.14 5C THSC Chapter 382 382.085(b) Special Condition 1 PERMIT Special Term and Condition 11 OP Failure to prevent the exceedance of hourl tanks. (Category B13)	L5(c) 43(4)	te limits for storage
Date: 12/	/07/2020 (1672558)		
Self Report?	NO	Classification:	Minor
Citation:	30 TAC Chapter 111, SubChapter A 111.11 30 TAC Chapter 122, SubChapter B 122.14 5C THSC Chapter 382 382.085(b) Special Term & Condition 1A OP	43(4)	
Description: Self Report? Citation:	Failure to conduct daily visible emission ob NO	Classification:	GORY C1 Violation) Moderate
	30 TAC Chapter 116, SubChapter B 116.11 30 TAC Chapter 122, SubChapter B 122.14 5C THSC Chapter 382 382.085(b) Special Condition 5D PERMIT Special Term & Condition 11 OP		
Description:	Failure to maintain natural gas content for Violation)	Flare (Unit ID: X-	501). (CATEGORY C4
Self Report? Citation:	NO	Classification:	Moderate
	30 TAC Chapter 116, SubChapter B 116.11 30 TAC Chapter 122, SubChapter B 122.14 40 CFR Chapter 60, SubChapter C, PT 60, 5C THSC Chapter 382 382.085(b) General Condition 9 PERMIT Special Term & Condition 11 OP	43(4)	o(a)(3)(i)
Description:	Failure to maintain vapor recovery system C4 Violation)	for Flare (Unit ID:	X-501). (CATEGORY
Self Report? Citation:	NO	Classification:	Moderate
	30 TAC Chapter 116, SubChapter B 116.11 30 TAC Chapter 116, SubChapter B 116.11 30 TAC Chapter 122, SubChapter B 122.14 5C THSC Chapter 382 382.085(b) FOP, Special Term and Condition 11 OP NSR, Special Condition 1 PERMIT	L5(c)	
Description:	Failure to maintain hourly VOC emission ra tanks. (CATEGORY C4 Violation)		ed limits for storage
Self Report? Citation:	NO	Classification:	Moderate
	30 TAC Chapter 116, SubChapter B 116.11 30 TAC Chapter 122, SubChapter B 122.14 40 CFR Chapter 60, SubChapter C, PT 60, 5C THSC Chapter 382 382.085(b) Special Condition 5B PERMIT Special Term & Condition 11 OP	43(4) SubPT A 60.18(c)(	
Description: Self Report?	Failure to maintain pilot for Flare (Unit ID: NO	X-401). (CATEGO Classification:	RY C4 Violation) Moderate
Citation: Description:	30 TAC Chapter 116, SubChapter B 116.11 30 TAC Chapter 122, SubChapter B 122.14 40 CFR Chapter 60, SubChapter C, PT 60, 5C THSC Chapter 382 382.085(b) Special Condition 5B PERMIT Special Term & Condition 11 OP Special Term & Condition 1A OP Failure to maintain pilot for Flare (Unit ID:	13(4) SubPT A 60.18(c)(	

Self Report? Citation:	NO	Classification:	Moderate
	5C THSC Chapter 382 382.08 Special Condition 5B PERMIT Special Term & Condition 11 Special Term & Condition 1A	pter B 122.143(4) ter C, PT 60, SubPT A 60.18(c) 5(b) OP OP	
Description: Self Report? Citation:	Failure to maintain pilot for Fl NO	are (Unit ID: X-602). (CATEGC Classification:	RY C4 Violation) Moderate
	30 TAC Chapter 116, SubCha 30 TAC Chapter 122, SubCha 5C THSC Chapter 382 382.08 Special Condition 19 PERMIT Special Term & Condition 11	pter B 122.143(4) 5(b) OP	
Description:	Failure to conduct weekly visi Baghouse (Unit ID: R-301). (	ble emissions observations for CATEGORY B1 Violation)	the Flaking Plant
Self Report? Citation:	NO	Classification:	Moderate
Description:		pter B 122.143(4) 5(b) OP ling analysis for Wastewater Su	ırge Tank (Unit ID:
Solf Doport?	F-1001). (CATEGORY B1 Viola NO	ation) Classification:	Minor
Self Report? Citation:	NO	Classification:	MINO
Description:	30 TAC Chapter 116, SubCha 30 TAC Chapter 122, SubCha 5C THSC Chapter 382 382.08 Special Condition 7B PERMIT Special Term & Condition 11 Failure to conduct daily condu and W-503). (CATEGORY C1	pter B 122.143(4) 5(b) OP uctivity for Cooling Towers (Uni	t IDs: W-501; W-502;
Self Report?	NO	Classification:	Moderate
Citation: Description:	30 TAC Chapter 116, SubCha 30 TAC Chapter 122, SubCha 5C THSC Chapter 382 382.08 FOP, Special Term & Conditio NSR, Special Condition 7B PE Failure to conduct weekly tota (Unit IDs: W-501; W-502; an	pter B 122.143(4) 5(b) n 11 OP RMIT al dissolved solids (TDS) sampli	ing on Cooling Towers
Date: 02,	/28/2021 (1727954)		
Self Report? Citation:	YES	Classification:	Moderate
Description:	2D TWC Chapter 26, SubChap 30 TAC Chapter 305, SubCha Failure to meet the limit for o	pter F 305.125(1)	
	/30/2021 (1777638)		
Self Report? Citation:	YES	Classification:	Moderate
Description:	2D TWC Chapter 26, SubChap 30 TAC Chapter 305, SubCha Failure to meet the limit for o		
Date: 10,	/31/2021 (1784437)		
Self Report?	YES	Classification:	Moderate
Citation:	2D TWC Chapter 26, SubChaj 30 TAC Chapter 305, SubCha	oter A 26.121(a) pter F 305.125(1)	
		B 83	

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Self Report? Citation:	NO	( laceitication -	Moderate
Citation.		Classification:	Moderate
	2341 PERMIT 30 TAC Chapter 116, SubChapter 30 TAC Chapter 122, SubChapter 5C THSC Chapter 382 382.085(b) 01431 OP	B 122.143(4)	
Description:	Failure to maintain Natural Gas C P3014, Unit ID: X-501] (Category		ume for Flare [B
Self Report? Citation:	NO	Classification:	Moderate
	2341 PERMIT 30 TAC Chapter 116, SubChapter 30 TAC Chapter 122, SubChapter 5C THSC Chapter 382 382.085(b) 01431 OP	B 122.143(4)	
Description:	Failure to maintain Natural Gas C EPN: P6001, Unit ID: X-695] (Cat		ume for Flare [E
Self Report? Citation:	NO	Classification:	Moderate
	30 TAC Chapter 111, SubChapter 30 TAC Chapter 122, SubChapter 5C THSC Chapter 382 382.085(b) 01431 OP	B 122.143(4)	
Description:	Failure to perform daily visible en X-501, X-601, X-602, X-695, & X		nit IDs: X-401,
Self Report? Citation:	NO	Classification:	Moderate
Description:	2341 PERMIT 30 TAC Chapter 116, SubChapter 30 TAC Chapter 122, SubChapter 40 CFR Chapter 60, SubChapter ( 5C THSC Chapter 382 382.085(b) 01431 OP Failure to maintain the operationa	B 122.143(4) C, PT 60, SubPT Kb 60.1121	
Self Report?	Flare [EPN: P3014, Unit ID: X-50 NO		Moderate
Citation:	2341 PERMIT 30 TAC Chapter 116, SubChapter 30 TAC Chapter 122, SubChapter 5C THSC Chapter 382 382.085(b) 01431 OP	B 122.143(4)	
Description:	Failure to collect and/or analyze c [EPNs: W-501, W-502 & W-503]		
Self Report? Citation:	NO	Classification:	Moderate
	2341 PERMIT 30 TAC Chapter 116, SubChapter 30 TAC Chapter 122, SubChapter 40 CFR Chapter 60, SubChapter ( 5C THSC Chapter 382 382.085(b) 01431 OP	B 122.143(4) C, PT 60, SubPT A 60.18(c)	(2)
Description:	Failure to maintain pilot flame for (Category B17)	Flare [EPN: P4004; Unit II	D: Flare X-401]
Self Report? Citation:	NO	Classification:	Moderate
	2341 PERMIT 30 TAC Chapter 116, SubChapter 30 TAC Chapter 122, SubChapter 40 CFR Chapter 60, SubChapter (	B 122.143(4) C, PT 60, SubPT A 60.18(c)	(2)
	5C THSC Chapter 382 382.085(b) 01431 OP		
Description:			D: Flare X-501]

Citation:			
	2341 PERMIT		
	30 TAC Chapter 116, SubChapter B 116 30 TAC Chapter 122, SubChapter B 122		
	40 CFR Chapter 60, SubChapter C, PT 6		(2)
	5C THSC Chapter 382 382.085(b)	, , , , , , , , , , , , , , , , , , , ,	. ,
Description	O1431 OP		
Description:	Failure to maintain pilot flame for Flare (Category B17)		J: Flare X-602]
Self Report?	NO	Classification:	Moderate
Citation:			
	2341 PERMIT	115(-)	
	30 TAC Chapter 116, SubChapter B 116 30 TAC Chapter 122, SubChapter B 122		
	40 CFR Chapter 60, SubChapter C, PT 6		(2)
	5C THSC Chapter 382 382.085(b) 01431 OP		
Description:	Failure to maintain pilot flame for Flare	[EPN: P7002; Unit II	D: Flare X- 794]
·	(Category B17)	. ,	-
Self Report?	NO	Classification:	Moderate
Citation:	30 TAC Chapter 101, SubChapter F 101	201(6)(2)	
	30 TAC Chapter 101, Subchapter F 101 30 TAC Chapter 122, SubChapter B 122		
	5C THSC Chapter 382 382.085(b)		
Description	O1431 OP Failure to document required information	n for non ronortable	omission overts
Description:	(Category B1)		emission events
Self Report?	NO	Classification:	Moderate
Citation:			
	2341 PERMIT 30 TAC Chapter 116, SubChapter B 116	5.115(c)	
	30 TAC Chapter 122, SubChapter B 122	2.143(4)	
	40 CFR Chapter 60, SubChapter C, PT 6	50, SubPT A 60.18(c)	(3)(i)(B)(ii)
	5C THSC Chapter 382 382.085(b) 01431 OP		
Description:	Failure to maintain heating value of 300	) British Thermal Uni	t per standard cubic
	feet (Btu/scf) or greater for Flare [EPN:		•
Self Report? Citation:	NO	Classification:	Moderate
Citation	30 TAC Chapter 122, SubChapter B 122	2.143(4)	
	5C THSC Chapter 382 382.085(b)	- ( )	
Deceription	O1431 OP		
Description:	Failure to document degreaser inspection (Category B1)	ons for degreaser [EF	N: DEGREASE]
Self Report?	NO	Classification:	Moderate
Citation:			
	2341 PERMIT	115(b)(2)(E)	
	30 TAC Chapter 116, SubChapter B 116 30 TAC Chapter 116, SubChapter B 116		
	30 TAC Chapter 122, SubChapter B 122		
	5C THSC Chapter 382 382.085(b) 01431 OP		
Description:	Failure to prevent exceedances of volat	ile organic compound	ls (VOC) limits (in
	lb/hr) for Storage Tanks (Category B17	)	
Self Report?	NO	Classification:	Moderate
Citation:	2341 PERMIT		
	30 TAC Chapter 116, SubChapter B 116		
	30 TAC Chapter 122, SubChapter B 122 5C THSC Chapter 382 382.085(b)	2.143(4)	
	O1431 OP		
Description:	Failure to collect and/or analyze weekly		
	Cooling Towers [EPNs: W-501, W-502 8	& W-503] (Category	81)

 $\ast$  NOVs applicable for the Compliance History rating period 9/1/2017 to 8/31/2022

Item 1*	December 13, 2017**	(1468657)
Item 2*	January 10, 2018**	(1475367)
Item 3*	February 12, 2018**	(1487563)
Item 4*	March 09, 2018**	(1491242)
Item 5*	April 12, 2018**	(1494493)
Item 6*	May 11, 2018**	(1501439)
Item 7	June 18, 2018**	(1508531)
Item 8	July 12, 2018**	(1514861)
Item 9	August 16, 2018**	(1520915)
Item 10*	September 19, 2018**	(1528096)
Item 11	October 24, 2018**	(1518109)
Item 12*	November 14, 2018**	(1542273)
Item 13*	December 08, 2018**	(1546041)
Item 14*	January 11, 2019**	(1562161)
Item 15	February 08, 2019**	(1517608)
Item 16*	February 12, 2019**	(1562159)
Item 17*	March 11, 2019**	(1562160)
Item 18*	March 15, 2019**	(1552334)
Item 19*	April 12, 2019**	(1572639)
Item 20*	May 09, 2019**	(1584889)
Item 21*	June 12, 2019**	(1584890)
Item 22	July 17, 2019**	(1593990)
Item 23*	August 16, 2019**	(1600311)
Item 24*	September 20, 2019**	(1607203)
Item 25	October 21, 2019**	(1614055)
Item 26*	, November 20, 2019**	(1619866)
Item 27*	December 16, 2019**	(1627227)
Item 28*	January 16, 2020**	(1634863)
Item 29*	February 18, 2020**	(1641478)
Item 30*	March 17, 2020**	(1647988)
Item 31	April 16, 2020**	(1654339)
Item 32*	April 22, 2020**	(1645143)
Item 33*	April 24, 2020**	(1644776)
Item 34*	May 20, 2020**	(1660904)
Item 35*	June 18, 2020**	(1667437)
Item 36*	July 17, 2020**	(1674386)
Item 37*	August 10, 2020**	(1664688)
Item 38*	August 14, 2020**	(1681161)
Item 39	August 31, 2020**	(1592472)
Item 40*	-	
Item 40*	September 17, 2020**	(1687730)
	September 18, 2020**	(1694076)
Item 42*	November 16, 2020**	(1714885)
Item 43	December 07, 2020**	(1672558)
Item 44*	December 18, 2020**	(1714886)
Item 45*	January 12, 2021**	(1714887)
Item 46*	January 15, 2021**	(1696713)
Item 47*	February 17, 2021**	(1727953)

Item 48	March 17, 2021**	(1727954)
Item 49*	April 28, 2021**	(1727955)
Item 50*	May 20, 2021**	(1741264)
Item 51*	June 03, 2021**	(1724717)
Item 52	June 04, 2021**	(1725041)
Item 53*	June 14, 2021**	(1741265)
Item 54*	July 17, 2021**	(1752510)
Item 55*	August 10, 2021**	(1747264)
Item 56*	August 13, 2021**	(1757935)
Item 57*	September 20, 2021**	(1767168)
Item 58*	October 20, 2021**	(1765211)
Item 59	November 19, 2021**	(1784437)
Item 60	November 30, 2021**	(1685454)
Item 61	December 06, 2021**	(1771935)
Item 62*	December 16, 2021**	(1791467)
Item 63*	January 18, 2022**	(1799309)
Item 64*	February 11, 2022**	(1807127)
Item 65*	March 11, 2022**	(1814193)
Item 66*	April 12, 2022**	(1820766)
Item 67*	May 17, 2022**	(1829598)
Item 68*	June 16, 2022**	(1835895)
Item 69	June 30, 2022**	(1762629)
Item 70*	July 18, 2022**	(1843096)
Item 71*	August 17, 2022**	(1849264)
Item 72*	September 15, 2022	(1857026)

 $\ensuremath{^*}$  No violations documented during this investigation

\*\*Investigation applicable for the Compliance History Rating period between 09/01/2017 and 08/31/2022.

# TEXAS COMMISSION ON ENVIRONMENTAL QUALITY



IN THE MATTER OF AN ENFORCEMENT ACTION CONCERNING SI GROUP, INC. RN100218999 BEFORE THE TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

#### AGREED ORDER DOCKET NO. 2020-1255-AIR-E

<u>s</u> <u>s</u> <u>s</u> <u>s</u> <u>s</u> <u>s</u>

§

# I. JURISDICTION AND STIPULATIONS

On \_\_\_\_\_\_\_, the Texas Commission on Environmental Quality ("the Commission" or "TCEQ") considered this agreement of the parties, resolving an enforcement action regarding SI Group, Inc. (the "Respondent") under the authority of TEX. HEALTH & SAFETY CODE ch. 382 and TEX. WATER CODE ch. 7. The Executive Director of the TCEQ, through the Enforcement Division, and the Respondent, represented by J. Scott Janoe of the law firm of Baker Botts L.L.P., together stipulate that:

- 1. The Respondent owns and operates a chemical manufacturing plant located at 702 Farm-to-Market Road 523 in Freeport, Brazoria County, Texas (the "Plant"). The Plant consists or consisted of one or more sources as defined in TEX. HEALTH & SAFETY CODE § 382.003(12).
- 2. The Executive Director and the Respondent agree that the TCEQ has jurisdiction to enter this Order pursuant to TEX. WATER CODE §§ 7.002, 7.051, and 7.073, and that the Respondent is subject to TCEQ's jurisdiction. The TCEQ has jurisdiction in this matter pursuant to TEX. WATER CODE § 5.013 because it alleges violations of TEX. HEALTH & SAFETY CODE ch. 382 and the rules of the TCEQ.
- 3. The occurrence of any violation is in dispute and the entry of this Order shall not constitute an admission by the Respondent of any violation alleged in Section II ("Allegations"), nor of any statute or rule.
- 4. An administrative penalty in the amount of \$155,159 is assessed by the Commission in settlement of the violations alleged in Section II ("Allegations"). The Respondent paid \$124,128 of the penalty and \$31,031 is deferred contingent upon the Respondent's timely and satisfactory compliance with all the terms of this Order. The deferred amount shall be waived only upon full compliance with all the terms and conditions contained in this Order. If the Respondent fails to timely and satisfactorily comply with any of the terms or requirements contained in this Order, the Executive Director may demand payment of all or part of the deferred penalty amount.
- 5. The Executive Director and the Respondent agree on a settlement of the matters alleged in this enforcement action, subject to final approval in accordance with 30 TEX. ADMIN. CODE § 70.10(a). Any notice and procedures, which might otherwise be authorized or required in this action, are waived in the interest of a more timely resolution of the matter.

- 6. The Executive Director may, without further notice or hearing, refer this matter to the Office of the Attorney General of the State of Texas ("OAG") for further enforcement proceedings if the Executive Director determines that the Respondent has not complied with one or more of the terms or conditions in this Order.
- 7. This Order represents the complete and fully integrated agreement of the parties. The provisions of this Order are deemed severable and, if a court of competent jurisdiction or other appropriate authority deems any provision of this Order unenforceable, the remaining provisions shall be valid and enforceable.
- 8. This Order shall terminate five years from its effective date or upon compliance with all the terms and conditions set forth in this Order, whichever is later.
- 9. The Executive Director recognizes that the Respondent implemented the following corrective measures at the Plant:
  - a. On June 29, 2018, amended New Source Review ("NSR") Permit No. 2341 that removed the waste gas stream flow limit to Flare X-501;
  - b. On August 21, 2018, began maintaining the records for the first and final repair for the two fugitive components that were determined to be leaking in March 2018 and August 2018;
  - c. By February 21, 2019, added a third pilot light to Flare X-794, Flare X-401, Flare X-601, and Flare X-695 and implemented a program to conduct visual pilot confirmations in the event instrumentation indicate a loss of the pilot in order to ensure that the flare systems are operated with a flame present at all times and/or have a constant flame for Flare X-401, Flare X-601, Flare X-602, Flare X-695, and Flare X-794;
  - d. On October 30, 2019, began maintaining records in the process control data historian demonstrating that the gas fuel usage for each combustion device is recorded monthly;
  - e. On January 31, 2020, began maintaining the records for the sulfur dioxide ("SO2") emissions data and fuel sampling data for the fuel oil used as raw material;
  - f. On January 31, 2020, ceased operating the Carbon Adsorption System ("CAS");
  - g. On March 10, 2020, implemented measures and procedures for calculating the monthly and rolling 12-month volatile organic compounds ("VOC") emissions from all storage tanks and began maintaining records for the VOC emissions from all storage tanks that includes the data and information as specified in NSR Permit No. 2341;
  - h. By June 30, 2020, implemented procedures for the records needed for the emergency engines and began maintaining records for each time the emergency engines are operated for testing and maintenance;
  - i. On June 30, 2020, implemented procedures for the records needed for each stationary reciprocating internal combustion engine ("RICE") and began

maintaining records for the hours of operation of each stationary RICE that is recorded through the non-resettable hour meter;

- j. On June 30, 2020, implemented procedures for the records needed for the audio, olfactory, and visual ("AOV") checks for VOC leaks and began maintaining records demonstrating that the AOV checks for VOC leaks within the heavy liquid components are being conducted at least once per shift, not to exceed 12 hours;
- k. On June 30, 2020, implemented procedures for the records needed for the relief valve monitoring and began maintaining records for the relief valve monitoring demonstrating that the emissions from any relief valve that vented to the atmosphere are monitored within 24 hours of the release;
- 1. On June 30, 2020, implemented procedures for the records needed for the new connector monitoring and began maintaining records for the new connector monitoring demonstrating that all new connectors are monitored and checked for leaks within 30 days of being placed in VOC service;
- m. On June 30, 2020, implemented procedures for the records needed for the calibration of the monitoring instruments and began maintaining records for the calibration of the monitoring instruments demonstrating that the calibration of each monitoring instrument used on components and process areas are performed;
- n. On June 30, 2020, implemented procedures for the records needed for exempt components and began maintaining records by the process unit that identifies and justifies each exemption by component claimed under 30 Tex. ADMIN. CODE § 115.357;
- o. On June 30, 2020, implemented procedures for the records needed for the equipment subject to the 40 CODE OF FEDERAL REGULATIONS ("CFR") Part 60 Subpart VV requirements and began maintaining records for all equipment subject to the 40 CFR Part 60 Subpart VV requirements;
- p. On July 1, 2020, implemented procedures for the records needed for the flared gas and began maintaining records demonstrating that the net heating values for the flared gas are recorded at least once every 15 minutes;
- q. On July 1, 2020, implemented procedures for the records needed for the flares and began maintaining records demonstrating that the actual exit velocity for the flares is recorded at least once every 15 minutes;
- r. By July 1, 2020, designed documentation for establishing the flow rate for the Water Scrubber F-700 and began maintaining records that contained the data and information for the flow rate for Water Scrubber F-700 when waste gases are directed to the scrubber in order to demonstrate compliance with NSR Permit No. 2341;
- s. On July 20, 2020, began maintaining the records for the maintenance conducted on each stationary RICE; and

t. On July 20, 2020, began maintaining records demonstrating that each diesel engine manufacturer's design and operation specifications and all emission-related maintenance requirements are maintained at the Plant.

### **II. ALLEGATIONS**

During an investigation at the Plant conducted on November 19, 2019, an investigator documented that the Respondent:

- 1. Failed to maintain records for the fixed roof storage tanks, in violation of 30 TEX. ADMIN. CODE §§ 115.118(a)(6)(A) and 122.143(4), Federal Operating Permit ("FOP") No. 01431, General Terms and Conditions ("GTC") and Special Terms and Conditions ("STC") No. 1.A, and TEX. HEALTH & SAFETY CODE § 382.085(b). Specifically, the Respondent did not maintain a record of the type of VOC stored, the starting and ending dates of when the material is stored, and the true vapor pressure at the average monthly storage temperature of the stored liquids for the fixed roof storage tanks.
- 2. Failed to maintain records for the totalizing fuel flow meters, in violation of 30 TEX. ADMIN. CODE §§ 117.340(a) and 122.143(4), FOP No. 01431, GTC and STC No. 1.A, and TEX. HEALTH & SAFETY CODE § 382.085(b). Specifically, the Respondent did not maintain a record of the installation and calibrations for the totalizing fuel flow meters.
- 3. Failed to limit the storage and loading operations to the chemicals appearing on the Approved Chemicals List or chemicals that are authorized through a permit a by rule, in violation of 30 TEX. ADMIN. CODE §§ 116.115(c), 116.116(a)(2), and 122.143(4), NSR Permit No. 2341, Special Conditions ("SC") No. 3, FOP No. 01431, GTC and STC No. 11, and TEX. HEALTH & SAFETY CODE § 382.085(b). Specifically, the Respondent did not limit the chemicals used in the storage and loading operations to those appearing on the Approved Chemicals List.
- 4. Failed to maintain records for the true vapor pressure of the material stored in the fixed roof tanks, in violation of 30 Tex. ADMIN. CODE §§ 116.115(b)(2)(E)(i) and (c) and 122.143(4), NSR Permit No. 2341, SC No. 20, FOP No. O1431, GTC and STC No. 11, and TEX. HEALTH & SAFETY CODE § 382.085(b). Specifically, the Respondent did not maintain a record demonstrating that the true vapor pressure of the material stored in the fixed-roof tanks with capacities equal to or greater than 25,000 gallons (normal storage capacity) is less than 0.5 pound per square inch absolute ("psia") at the maximum liquid storage temperature.
- 5. Failed to maintain records for the flares containing information and data sufficient to demonstrate compliance with the permit, in violation of 30 Tex. ADMIN. CODE §§ 116.115(b)(2)(E)(i) and (c) and 122.143(4), NSR Permit No. 2341, SC No. 20, FOP No. O1431, GTC and STC No. 11, and Tex. HEALTH & SAFETY CODE § 382.085(b). Specifically, the Respondent did not maintain a record containing the data and information for the 15-minute readings and averaged hourly values for the vent stream flow and composition for the flare flow monitors and composition analyzers and the hourly mass emission rates for the flares to demonstrate compliance with NSR Permit No. 2341.
- 6. Failed to maintain an emissions record for all loading operations, in violation of 30 Tex. ADMIN. CODE §§ 116.115(c) and 122.143(4), NSR Permit No. 2341, SC Nos. 12.A and 21, FOP No. 01431, GTC and STC No. 11, and Tex. HEALTH & SAFETY CODE § 382.085(b). Specifically, the Respondent did not maintain a record of the monthly emissions that

included the calculated VOC emissions from all loading operations over the previous rolling 12-month period, loading spot, control method used, quantity loaded in gallons, name of the liquid loaded, vapor molecular weight, liquid temperature in degrees Fahrenheit, liquid vapor pressure at the liquid temperature in psia, and liquid throughput for the previous month and rolling 12-months to date.

- 7. Failed to maintain records for the fresh water flow rates for the water scrubbers, in violation of 30 TEX. ADMIN. CODE §§ 116.115(b)(2)(E)(i) and (c) and 122.143(4), NSR Permit No. 2341, SC No. 21, FOP No. 01431, GTC and STC No. 11, and TEX. HEALTH & SAFETY CODE § 382.085(b). Specifically, the Respondent did not maintain a record of the fresh water flow rate to the educator for the Water Scrubber F-750 when each railcar is connected to be controlled.
- 8. Failed to maintain records for each vacuum pump and steam jet, in violation of 30 TEX. ADMIN. CODE §§ 116.115(b)(2)(E)(i) and (c) and 122.143(4), NSR Permit No. 2341, SC Nos. 17 and 21, FOP No. 01431, GTC and STC No. 11, and TEX. HEALTH & SAFETY CODE § 382.085(b). Specifically, the Respondent did not maintain a record of the hours of operation and monthly and rolling 12-month emissions for each vacuum pump and steam jet.
- 9. Failed to maintain records for the calibration of the lower explosive limit ("LEL") detector, in violation of 30 Tex. ADMIN. CODE §§ 116.115(b)(2)(E)(i) and (c) and 122.143(4), NSR Permit No. 84092, SC No. 20, FOP No. 01431, GTC and STC No. 11, and Tex. HEALTH & SAFETY CODE § 382.085(b). Specifically, the Respondent did not maintain a record demonstrating that each LEL detector was calibrated within 30 days of use with a certified pentane gas standard at 25% of the LEL for pentane.
- 10. Failed to maintain records for the functionality test for the LEL detector, in violation of 30 TEX. ADMIN. CODE §§ 116.115(b)(2)(E)(i) and (c) and 122.143(4), NSR Permit No. 84092, SC No. 4.C.(2), FOP No. 01431, GTC and STC No. 11, and TEX. HEALTH & SAFETY CODE § 382.085(b). Specifically, the Respondent did not maintain a record demonstrating that each LEL detector was tested to ensure functionality within 24 hours of use with a certified gas standard at 25% of the LEL for pentane.
- 11. Failed to maintain records for the monitoring of open-ended valve or line, in violation of 30 TEX. ADMIN. CODE §§ 116.115(b)(2)(E)(i) and (c) and 122.143(4), NSR Permit No. 84092, SC No. 5.B, FOP No. 01431, GTC and STC No. 11, and TEX. HEALTH & SAFETY CODE § 382.085(b). Specifically, the Respondent did not maintain a record demonstrating that an open-ended valve or line in association with planned maintenance, startup, and shutdown ("MSS") activities was monitored once by the end of the 72-hour period following the creation of the open-ended line and monthly thereafter with an approved gas analyzer.
- 12. Failed to maintain records for the fixed roof storage tanks used in MSS activities, in violation of 30 Tex. ADMIN. CODE §§ 116.115(b)(2)(E)(i) and (c) and 122.143(4), NSR Permit No. 84092, SC No. 6.D, FOP No. O1431, GTC and STC No. 11, and Tex. HEALTH & SAFETY CODE § 382.085(b). Specifically, the Respondent did not maintain a record of the fixed roof storage tanks used in MSS activities that included the estimates of emissions; date; time; other information specified for each of the following events: start and completion of controlled degassing and total volumetric flow, all standing liquid that was removed from the tank or any transfers of low VOC partial pressure liquid to or from the tank including volumes and vapor pressures to reduce tank liquid VOC partial pressure to

less than 0.02 psia, if there is liquid in the tank, VOC partial pressure of liquid, start and completion of uncontrolled degassing, and total volumetric flow; and the estimated quantity of each air contaminant, or mixture of air contaminants, emitted with the data and methods used to determine it to demonstrate compliance with NSR Permit No. 84092.

- 13. Failed to maintain records for each vacuum truck used to support planned MSS activities at the Plant, in violation of 30 TEX. ADMIN. CODE §§ 116.115(b)(2)(E)(i) and (c) and 122.143(4), NSR Permit No. 84092, SC No. 7.B.(3), FOP No. 01431, GTC and STC No. 11, and TEX. HEALTH & SAFETY CODE § 382.085(b). Specifically, the Respondent did not maintain a record of each vacuum truck used to support planned MSS activities at the Plant that included a daily record containing the duration of any periods when air may have been entrained with the liquid transfer, the reason for operating in this manner, whether a "duckbill" or equivalent was used for each liquid transfer made with the vacuum operating, and the VOC exhaust concentration upon commencing each transfer, at the end of each transfer, and at least every hour during each transfer if the vacuum truck exhaust is controlled with a control device other than an engine or oxidizer to demonstrate compliance with NSR Permit No. 84092.
- 14. Failed to maintain records for the frac tanks used in support of MSS activities, in violation of 30 Tex. ADMIN. CODE §§ 116.115(c) and 122.143(4), NSR Permit No. 84092, SC No. 8.D, FOP No. 01431, GTC and STC No. 11, and Tex. HEALTH & SAFETY CODE § 382.085(b). Specifically, the Respondent did not maintain a record of the monthly emissions for the frac tanks used in support of MSS activities that included the calculated emissions of VOC from all frac tanks, tank identification number, dates put into and removed from service, control method used, tank capacity and volume of liquid stored in gallons, name of the material stored, VOC molecular weight, and VOC partial pressure at the estimated monthly average material temperature in psia during the previous calendar month and the past consecutive 12-month period.
- 15. Failed to maintain records containing sufficient information to demonstrate compliance with the applicable Permit by Rule ("PBR") conditions, in violation of 30 TEX. ADMIN. CODE §§ 106.8(c)(2)(B) and (c)(4), 106.263(g)(3), and 122.143(4), FOP No. 01431, GTC and STC Nos. 12 and 13, and TEX. HEALTH & SAFETY CODE § 382.085(b). Specifically, the Respondent did not maintain a record of all MSS activities at the Plant that included the date, time, and duration of each MSS activity.
- 16. Failed to maintain records containing sufficient information to demonstrate compliance with the applicable PBR conditions, in violation of 30 TEX. ADMIN. CODE §§ 106.8(c)(2)(B) and (c)(4), 106.476, 106.511, and 122.143(4), FOP No. 01431, GTC and STC Nos. 12 and 13, and TEX. HEALTH & SAFETY CODE § 382.085(b). Specifically, the Respondent did not maintain a record demonstrating that controls were used for pressurized tanks or tanks vented. Also, the Respondent did not maintain a record for the annual operating hours of portable and emergency engines and turbines at the Plant.
- 17. Failed to maintain records of the flame for the flares, in violation of 30 TEX. ADMIN. CODE §§ 101.20(1), 116.115(b)(2)(E)(i) and (c), and 122.143(4), 40 CFR § 60.18(c)(2), NSR Permit No. 2341, SC Nos. 5.B and 20, FOP No. 01431, GTC and STC Nos. 1.A and 11, and TEX. HEALTH & SAFETY CODE § 382.085(b). Specifically, the Respondent did not maintain records demonstrating that the flare system was operated with a flame present at all times and/or have a constant flame for Flare X-401 for a total of 25.35 hours from March 29, 2018 to February 21, 2019, for Flare X-601 for a total of 9.34 hours from

February 26, 2018 to February 21, 2019, for Flare X-602 for a total of 1.62 hours from March 28, 2018 to February 21, 2019, for Flare X-695 for a total of 92.28 hours from March 29, 2018 to February 21, 2019, and for Flare X-794 for a total of 0.82 hour from April 5, 2018 to April 14, 2018.

- 18. Failed to limit the waste gas stream flow to Flare X-501, in violation of 30 TEX. ADMIN. CODE §§ 116.115(c) and 122.143(4), NSR Permit No. 2341, SC No. 4.D, FOP No. 01431, GTC and STC No. 11, and TEX. HEALTH & SAFETY CODE § 382.085(b). Specifically, the Respondent exceeded the waste gas stream flow limit of 8,440 standard cubic feet per hour ("scf/hr") to Flare X-501 by a range of 8,839 scf/hr to 12,376 scf/hr for 45 onehour periods from February 22, 2018 to June 29, 2018.
- 19. Failed to maintain records of the SO2 emissions data and fuel sampling data for the fuel oil used as raw material, in violation of 30 Tex. ADMIN. CODE §§ 112.2(c) and 122.143(4), FOP No. 01431, GTC and STC No. 1.A, and Tex. HEALTH & SAFETY CODE § 382.085(b).
- 20. Failed to maintain records of each time an engine is operated for testing and maintenance, in violation of 30 Tex. ADMIN. CODE §§ 117.345(f)(10) and 122.143(4), FOP No. 01431, GTC and STC No. 1.A, and Tex. HEALTH & SAFETY CODE § 382.085(b). Specifically, the Respondent did not maintain a record of each time the emergency engines were operated for testing and maintenance.
- 21. Failed to maintain records of the net heating values for the flares, in violation of 30 TEX. ADMIN. CODE §§ 101.20(1), 116.115(b)(2)(E)(i) and (c), and 122.143(4), 40 CFR § 60.18(c)(3)(ii), NSR Permit No. 2341, SC Nos. 5.D and 20, FOP No. 01431, GTC and STC No. 11, and TEX. HEALTH & SAFETY CODE § 382.085(b). Specifically, the Respondent did not maintain a record demonstrating that the net heating values for the flared gas was recorded at least once every 15 minutes.
- Failed to maintain records of the actual exit velocity for the flares, in violation of 30 TEX. ADMIN. CODE §§ 116.115(b)(2)(E)(i) and (c) and 122.143(4), NSR Permit No. 2341, SC Nos. 5.D and 20, FOP No. 01431, GTC and STC No. 11, and TEX. HEALTH & SAFETY CODE § 382.085(b). Specifically, the Respondent did not maintain a record demonstrating that the actual exit velocity for the flares was recorded at least once every 15 minutes.
- 23. Failed to maintain records of the maintenance for a stationary RICE, in violation of 30 TEX. ADMIN. CODE §§ 101.20(2), 113.1090, and 122.143(4), 40 CFR § 63.6655(e), FOP No. O1431, GTC and STC No. 1.A, and TEX. HEALTH & SAFETY CODE § 382.085(b). Specifically, the Respondent did not maintain a record of the maintenance conducted on each stationary RICE.
- 24. Failed to maintain records of the hours of operation for a stationary RICE, in violation of 30 Tex. ADMIN. CODE §§ 101.20(2), 113.1090, and 122.143(4), 40 CFR § 63.6655(e), FOP No. 01431, GTC and STC No. 1.A, and Tex. HEALTH & SAFETY CODE § 382.085(b). Specifically, the Respondent did not maintain a record of the hours of operation for each stationary RICE that is recorded through the non-resettable hour meter.
- 25. Failed to maintain records of the emissions from all storage tanks, in violation of 30 Tex. ADMIN. CODE §§ 116.115(b)(2)(E) and (c) and 122.143(4), NSR Permit No. 2341, SC Nos. 4.E and 21, FOP No. O1431, GTC and STC No. 11, and Tex. HEALTH & SAFETY CODE § 382.085(b). Specifically, the Respondent did not maintain a record of the VOC emissions from all storage tanks during the previous calendar month and the past

consecutive 12-month period that included the tank identification number, control method used, tank capacity in gallons, name of the material stored, VOC molecular weight, VOC monthly average and the maximum temperatures in degrees Fahrenheit, VOC vapor pressure at the monthly average material temperature in psia, and VOC throughput for the previous month and year-to-date.

- 26. Failed to maintain records for the flare monitors, in violation of 30 TEX. ADMIN. CODE §§ 116.115(b)(2)(E) and (c) and 122.143(4), NSR Permit No. 2341, SC Nos. 15.A and 20, FOP No. O1431, GTC and STC No. 11, and TEX. HEALTH & SAFETY CODE § 382.085(b). Specifically, the Respondent did not maintain records that contained the data and information for the flow rate for Water Scrubber F-700 when waste gases were directed to the scrubber.
- 27. Failed to maintain records of the gas fuel usage for each combustion device, in violation of 30 TEX. ADMIN. CODE §§ 116.115(b)(2)(E) and (c) and 122.143(4), NSR Permit No. 2341, SC Nos. 14 and 21, FOP No. O1431, GTC and STC No. 11, and TEX. HEALTH & SAFETY CODE § 382.085(b). Specifically, the Respondent did not maintain a record demonstrating that the gas fuel usage for each combustion device was recorded monthly.
- 28. Failed to maintain records of the specifications for each diesel engine, in violation of 30 TEX. ADMIN. CODE §§ 116.115(b)(2)(E) and (c) and 122.143(4), NSR Permit No. 2341, SC Nos. 18 and 21, FOP No. 01431, GTC and STC No. 11, and TEX. HEALTH & SAFETY CODE § 382.085(b). Specifically, the Respondent did not maintain a record demonstrating that each diesel engine manufacturer's design and operation specifications and all emission-related maintenance requirements were maintained at the Plant.
- 29. Failed to maintain records of the downstream samples for the CAS, in violation of 30 TEX. ADMIN. CODE §§ 116.115(b)(2)(E) and (c) and 122.143(4), NSR Permit No. 84092, SC No. 10.A.(2), FOP No. 01431, GTC and STC No. 11, and TEX. HEALTH & SAFETY CODE § 382.085(b). Specifically, the Respondent did not maintain a record demonstrating that the CAS was sampled downstream of the first carbon canister and the concentration was recorded at least once every hour of the CAS run time to determine breakthrough of the VOC during planned MSS activities.
- 30. Failed to maintain records of the AOV checks, in violation of 30 TEX. ADMIN. CODE §§ 116.115(b)(2)(E) and (c) and 122.143(4), NSR Permit No. 2341, SC Nos. 10.A and 21, FOP No. 01431, GTC and STC No. 11, and TEX. HEALTH & SAFETY CODE § 382.085(b). Specifically, the Respondent did not maintain a record demonstrating that the AOV checks for VOC leaks within the heavy liquid components were being conducted at least once per shift, not to exceed 12 hours.
- 31. Failed to maintain records of the relief valve monitoring, in violation of 30 TEX. ADMIN. CODE §§ 115.354(4) and 122.143(4), FOP No. O1431, GTC and STC No. 1.A, and TEX. HEALTH & SAFETY CODE § 382.085(b). Specifically, the Respondent did not maintain a record of the relief valve monitoring demonstrating that the emissions from any relief valve that vented to the atmosphere were monitored within 24 hours of the release.
- 32. Failed to maintain records for new connector monitoring, in violation of 30 TEX. ADMIN. CODE §§ 115.354(4) and 122.143(4), FOP No. 01431, GTC and STC No. 1.A, and TEX. HEALTH & SAFETY CODE § 382.085(b). Specifically, the Respondent did not maintain a record demonstrating that all new connectors were monitored and checked for leaks within 30 days of being placed in VOC service.

- 33. Failed to maintain records of the calibration of the monitoring instruments, in violation of 30 TEX. ADMIN. CODE §§ 115.356(2)(D) and 122.143(4), FOP No. 01431, GTC and STC No. 1.A, and TEX. HEALTH & SAFETY CODE § 382.085(b). Specifically, the Respondent did not maintain a record demonstrating that the calibration of each monitoring instrument used on components and process areas was performed.
- 34. Failed to maintain records of the exempt components, in violation of 30 TEX. ADMIN. CODE §§ 101.20(1), 115.356(3)(C), and 122.143(4), 40 CFR § 60.480(d)(1), FOP No. 01431, GTC and STC No. 1.A, and TEX. HEALTH & SAFETY CODE § 382.085(b). Specifically, the Respondent did not maintain a record by process unit that identified and justified each exemption by component claimed under 30 TEX. ADMIN. CODE § 115.357.
- 35. Failed to maintain records of all equipment subject to the 40 CFR Part 60 Subpart VV requirements on site, in violation of 30 Tex. ADMIN. CODE §§ 101.20(2), 113.530, and 122.143(4), 40 CFR § 60.486(e), FOP No. O1431, GTC and STC No. 1.A, and Tex. HEALTH & SAFETY CODE § 382.085(b).
- 36. Failed to maintain records of repairs on fugitive components, in violation of 30 Tex. ADMIN. CODE §§ 101.20(1), 115.356(2)(E), and 122.143(4), 40 CFR § 60.486(c), FOP No. O1431, GTC and STC No. 1.A, and Tex. HEALTH & SAFETY CODE § 382.085(b). Specifically, the Respondent did not maintain a record of the first and/or final repair for two fugitive components that were determined to be leaking in March 2018 and August 2018.

#### **III. DENIALS**

The Respondent generally denies each allegation in Section II ("Allegations").

#### **IV. ORDERING PROVISIONS**

### NOW, THEREFORE, THE TEXAS COMMISSION ON ENVIRONMENTAL QUALITY ORDERS that:

1. The Respondent is assessed a penalty as set forth in Section I, Paragraph No. 4. The payment of this penalty and the Respondent's compliance with all of the requirements set forth in this Order resolve only the allegations in Section II. The Commission shall not be constrained in any manner from requiring corrective action or penalties for violations which are not raised here. Penalty payments shall be made payable to "TCEQ" and shall be sent with the notation "Re: SI Group, Inc., Docket No. 2020-1255-AIR-E" to:

Financial Administration Division, Revenue Operations Section Attention: Cashier's Office, MC 214 Texas Commission on Environmental Quality P.O. Box 13088 Austin, Texas 78711-3088

- 2. The Respondent shall undertake the following technical requirements at the Plant:
  - a. Within 30 days after the effective date of this Order:
    - i. Begin maintaining the records on-site for the fixed storage tanks including the type of VOC stored, the starting and ending dates of when the material is stored, and the true vapor pressure at the average

monthly storage temperature of the stored liquids in the fixed roof storage tanks;

- ii. Begin maintaining the records of the installation and calibrations for the totalizing fuel flow meters;
- iii. Begin maintaining records to demonstrate that the true vapor pressure of the material stored in the fixed-roof tanks with capacities equal to or greater than 25,000 gallons (normal storage capacity) is less than 0.5 psia at the maximum liquid storage temperature and maintain these records for at least five years;
- iv. Begin maintaining records that contain the information and data for the 15-minute readings and averaged hourly values for the vent stream flow and composition for the flare flow monitors and composition analyzers and the hourly mass emission rates for the flares to demonstrate compliance with NSR Permit No. 2341 and maintain these records for at least five years;
- v. Begin maintaining and updating the monthly emissions records for all truck, tank wagon, railcar, drumming, and tote loading operations that includes the data and information as described NSR Permit No. 2341 and maintain these records for at least five years;
- vi. Begin maintaining the records of the fresh water flow rate to the educator for the Water Scrubber F-750 when each railcar is connected to be controlled and maintain these records for at least five years;
- vii. Begin maintaining the records of the hours of operation and monthly and rolling 12-month emissions for each vacuum pump and steam jet and maintain these records for at least five years;
- viii. Begin maintaining records demonstrating that each LEL detector is calibrated within 30 days of use with a certified pentane gas standard at 25% of the LEL for pentane and maintain these records for at least five years;
- ix. Begin maintaining records demonstrating that each LEL detector is tested to ensure functionality within 24 hours of use with a certified gas standard at 25% of the LEL for pentane and maintain these records for at least five years;
- x. Begin maintaining records demonstrating that an open-ended valve or line in association with planned MSS activities is monitored once by the end of the 72-hour period following the creation of the open-ended line and monthly thereafter with an approved gas analyzer and maintain these records for at least five years;
- xi. Begin maintaining the records for the fixed roof storage tanks used in MSS activities that includes the data and information as described in NSR Permit No. 84092 and maintain these records for at least five years;

- xii. Begin maintaining the records for the vacuum trucks used to support planned MSS activities at the Plant that includes the data and information as described in NSR Permit No. 84092 and maintain these records for at least five years;
- xiii. Begin maintaining the records for monthly emissions for the frac tanks used in support of MSS activities that includes the data and information as specified in NSR Permit No. 84092 and maintain these records for at least five years;
- xiv. Begin maintaining the records for all MSS activities at the Plant that includes the date, time, and duration of each MSS activity and maintain these records for at least five years;
- xv. Begin maintaining the records of controls used for pressurized tanks or tanks vented and annual operating hours of portable and emergency engines and turbines at the Plant and maintain the records for at least five years; and
- xvi. Submit an administratively complete permit amendment application for NSR Permit No. 2341 to authorize the chemicals used in storage and loading operations that are not on the Approved Chemicals List, in accordance with 30 TEX. ADMIN. CODE ch. 116.111, to:

Air Permits Division, MC 163 Texas Commission on Environmental Quality P.O. Box 13087 Austin, Texas 78711-3087

- b. Respond completely and adequately, as determined by the TCEQ, to all requests for information concerning the permit amendment application by any deadline specified in writing.
- c. Within 45 days after the effective date of this Agreed Order, submit written certification to demonstrate compliance with Ordering Provision No. 2.a, as described in Ordering Provision No. 2.d.
- d. Within 180 days after the effective date of this Order, submit written certification that either the amendment for NSR Permit No. 2341 has been obtained or the use of the unauthorized chemicals not on the Approved Chemicals List has ceased until such time that the appropriate authorization is obtained, and include detailed supporting documentation including photographs, receipts, and/or other records to demonstrate compliance. The certification shall be signed by the Respondent and shall include the following certification language:

"I certify under penalty of law that I have personally examined and am familiar with the information submitted and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate and complete. I am aware that there are significant penalties for submitting false SI Group, Inc. DOCKET NO. 2020-1255-AIR-E Page 12

information, including the possibility of fines and imprisonment for knowing violations."

The certification shall be submitted to:

Enforcement Division, MC 149A Texas Commission on Environmental Quality P.O. Box 13087 Austin, Texas 78711-3087

with a copy to:

Air Section Manager Houston Regional Office Texas Commission on Environmental Quality 5425 Polk Street, Suite H Houston, Texas 77023-1452

- 3. All relief not expressly granted in this Order is denied.
- 4. The duties and provisions imposed by this Order shall apply to and be binding upon the Respondent. The Respondent is ordered to give notice of this Order to personnel who maintain day-to-day control over the Plant operations referenced in this Order.
- 5. If the Respondent fails to comply with any of the Ordering Provisions in this Order within the prescribed schedules, and that failure is caused solely by an act of God, war, strike, riot, or other catastrophe, the Respondent's failure to comply is not a violation of this Order. The Respondent shall have the burden of establishing to the Executive Director's satisfaction that such an event has occurred. The Respondent shall notify the Executive Director within seven days after the Respondent becomes aware of a delaying event and shall take all reasonable measures to mitigate and minimize any delay.
- 6. The Executive Director may grant an extension of any deadline in this Order or in any plan, report, or other document submitted pursuant to this Order, upon a written and substantiated showing of good cause. All requests for extensions by the Respondent shall be made in writing to the Executive Director. Extensions are not effective until the Respondent receives written approval from the Executive Director. The determination of what constitutes good cause rests solely with the Executive Director. Extension requests shall be sent to the Enforcement Division at the address listed above.
- 7. This Order, issued by the Commission, shall not be admissible against the Respondent in a civil proceeding, unless the proceeding is brought by the OAG to: (1) enforce the terms of this Order; or (2) pursue violations of a statute within the Commission's jurisdiction, or of a rule adopted or an order or permit issued by the Commission under such a statute.
- 8. This Order may be executed in separate and multiple counterparts, which together shall constitute a single instrument. Any page of this Order may be copied, scanned, digitized, converted to electronic portable document format ("pdf"), or otherwise reproduced and may be transmitted by digital or electronic transmission, including but not limited to facsimile transmission and electronic mail. Any signature affixed to this Order shall constitute an original signature for all purposes and may be used, filed,

substituted, or issued for any purpose for which an original signature could be used. The term "signature" shall include manual signatures and true and accurate reproductions of manual signatures created, executed, endorsed, adopted, or authorized by the person or persons to whom the signatures are attributable. Signatures may be copied or reproduced digitally, electronically, by photocopying, engraving, imprinting, lithographing, electronic mail, facsimile transmission, stamping, or any other means or process which the Executive Director deems acceptable. In this paragraph exclusively, the terms: electronic transmission, owner, person, writing, and written, shall have the meanings assigned to them under TEX. BUS. ORG. CODE § 1.002.

9. The effective date of this Order is the date it is signed by the Commission. A copy of this fully executed Order shall be provided to each of the parties.

SI Group, Inc. DOCKET NO. 2020-1255-AIR-E Page 14

#### SIGNATURE PAGE

# TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

For the Commission

Date

For the Executive Director

\_\_\_\_\_**7/7/2023** Date

I, the undersigned, have read and understand the attached Order. I am authorized to agree to the attached Order, and I do agree to the terms and conditions specified therein. I further acknowledge that the TCEQ, in accepting payment for the penalty amount, is materially relying on such representation.

I also understand that failure to comply with the Ordering Provisions, if any, in this Order and/or failure to timely pay the penalty amount, may result in:

- A negative impact on compliance history;
- Greater scrutiny of any permit applications submitted;
- Referral of this case to the OAG for contempt, injunctive relief, additional penalties, and/or attorney fees, or to a collection agency;
- Increased penalties in any future enforcement actions;
- Automatic referral to the OAG of any future enforcement actions; and
- TCEQ seeking other relief as authorized by law.

In addition, any falsification of any compliance documents may result in criminal prosecution.

Signature

Michael B. Farnell, Jr. Name (Printed or typed) Authorized Representative of SI Group, Inc.

SVP General Counsel & CSO Title

□ If mailing address has changed, please check this box and provide the new address below: