

TCEQ Interoffice Memorandum

To: Mary Smith, General Counsel

Thru: *MBC* Melissa Cordell, Assistant Deputy Director
Enforcement Division

From: *MP* Michael Parrish, Team Leader
Special Functions Team

Date: August 11, 2023

Subject: **Backup Revision**
August 16, 2023 Commission Agenda
Item No. 13 – SI Group, Inc.
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
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Executive Summary – Enforcement Matter – Case No. 59891
SI Group, Inc.
RN100218999
Docket No. 2020-1255-AIR-E

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. 01431, 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. 01431, 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

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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. O1431, 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. O1431, 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. O1431, 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. O1431, 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

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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

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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 hour from April 5, 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. O1431, 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. O1431, 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. O1431, 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. O1431, 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. O1431, GTC and STC No. 11, and TEX. HEALTH & SAFETY CODE § 382.085(b)].

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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. 01431, 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

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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. O1431, 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. O1431, 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. O1431, 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. O1431, 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. O1431, 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. 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. 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)].

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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;

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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;

l. 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.

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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;

Executive Summary – Enforcement Matter – Case No. 59891

SI Group, Inc.

RN100218999

Docket No. 2020-1255-AIR-E

- 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.

Executive Summary – Enforcement Matter – Case No. 59891

SI Group, Inc.

RN100218999

Docket No. 2020-1255-AIR-E

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



Penalty Calculation Worksheet (PCW)

Policy Revision 4 (April 2014)

PCW Revision March 26, 2014

DATES	Assigned	22-Sep-2020		
	PCW	23-Feb-2023	Screening	22-Sep-2020
			EPA Due	

RESPONDENT/FACILITY INFORMATION

Respondent	SI Group, Inc.			
Reg. Ent. Ref. No.	RN100218999			
Facility/Site Region	12-Houston	Major/Minor Source	Major	

CASE INFORMATION

Enf./Case ID No.	59891	No. of Violations	36
Docket No.	2020-1255-AIR-E	Order Type	1660
Media Program(s)	Air	Government/Non-Profit	No
Multi-Media		Enf. Coordinator	Danielle Porras
		EC's Team	Enforcement Team 2
Admin. Penalty \$ Limit Minimum	\$0	Maximum	\$25,000

Penalty Calculation Section

TOTAL BASE PENALTY (Sum of violation base penalties)	Subtotal 1	\$88,500
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ADJUSTMENTS (+/-) TO SUBTOTAL 1

Subtotals 2-7 are obtained by multiplying the Total Base Penalty (Subtotal 1) by the indicated percentage.

Compliance History	90.0%	Adjustment	Subtotals 2, 3, & 7	\$79,650
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Notes: Enhancement for one NOV with same/similar violations, four orders containing a denial of liability, and one order without a denial of liability. Reduction for four notices of intent to conduct an audit, three disclosures of violations, and a High Performer Classification.

Culpability	No	0.0%	Enhancement	Subtotal 4	\$0
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Notes: The Respondent does not meet the culpability criteria.

Good Faith Effort to Comply Total Adjustments	Subtotal 5	-\$12,991
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Economic Benefit	0.0%	Enhancement*	Subtotal 6	\$0
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Total EB Amounts	\$14,376
Estimated Cost of Compliance	\$141,000

*Capped at the Total EB \$ Amount

SUM OF SUBTOTALS 1-7	Final Subtotal	\$155,159
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OTHER FACTORS AS JUSTICE MAY REQUIRE	0.0%	Adjustment	\$0
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Reduces or enhances the Final Subtotal by the indicated percentage.

Notes:

Final Penalty Amount	\$155,159
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STATUTORY LIMIT ADJUSTMENT	Final Assessed Penalty	\$155,159
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DEFERRAL	20.0%	Reduction	Adjustment	-\$31,031
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Reduces the Final Assessed Penalty by the indicated percentage.

Notes:

Deferral offered for expedited settlement.

PAYABLE PENALTY	\$124,128
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Screening Date	22-Sep-2020	Docket No.	2020-1255-AIR-E	PCW
Respondent	SI Group, Inc.			<i>Policy Revision 4 (April 2014)</i>
Case ID No.	59891			<i>PCW Revision March 26, 2014</i>
Reg. Ent. Reference No.	RN100218999			
Media	Air			
Enf. Coordinator	Danielle Porras			

Compliance History Worksheet

>> Compliance History Site Enhancement (Subtotal 2)

Component	Number of...	Number	Adjust.
NOVs	Written notices of violation ("NOVs") with same or similar violations as those in the current enforcement action (<i>number of NOVs meeting criteria</i>)	1	5%
	Other written NOVs	0	0%
Orders	Any agreed final enforcement orders containing a denial of liability (<i>number of orders meeting criteria</i>)	4	80%
	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 and Consent Decrees	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%
	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 (<i>number of events</i>)	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 (<i>number of audits for which notices were submitted</i>)	4	-4%
	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%
Other	Environmental management systems in place for one year or more	No	0%
	Voluntary on-site compliance assessments conducted by the executive director under a special assistance program	No	0%
	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 Percentage (Subtotal 2) 100%

>> Repeat Violator (Subtotal 3)

No

Adjustment Percentage (Subtotal 3) 0%

>> Compliance History Person Classification (Subtotal 7)

High Performer

Adjustment Percentage (Subtotal 7) -10%

>> Compliance History Summary

Compliance History Notes	Enhancement for one NOV with same/similar violations, four orders containing a denial of liability, and one order without a denial of liability. Reduction for four notices of intent to conduct an audit, three disclosures of violations, and a High Performer Classification.
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Total Compliance History Adjustment Percentage (Subtotals 2, 3, & 7) 90%

>> Final Compliance History Adjustment

Final Adjustment Percentage *capped at 100% 90%

Screening Date 22-Sep-2020 Respondent SI Group, Inc. Case ID No. 59891 Reg. Ent. Reference No. RN100218999 Media Air Enf. Coordinator Danielle Porras	Docket No. 2020-1255-AIR-E	PCW <i>Policy Revision 4 (April 2014)</i> <i>PCW Revision March 26, 2014</i>
Violation Number 1		
Rule Cite(s) 30 Tex. Admin. Code §§ 115.118(a)(6)(A) and 122.143(4), Federal Operating Permit ("FOP") No. O1431, General Terms and Conditions ("GTC") and Special Terms and Conditions (STC") No. 1.A, and Tex. Health & Safety Code § 382.085(b)		
Violation Description 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.		
Base Penalty		\$25,000
>> Environmental, Property and Human Health Matrix		
OR	Release Actual Potential	Harm Major Moderate Minor
Percent		0.0%
>> Programmatic Matrix		
Falsification Major Moderate Minor		
		x
Percent		15.0%
Matrix Notes	100% of the rule requirements were not met.	
Adjustment		\$21,250
		\$3,750
Violation Events		
Number of Violation Events 1		308 Number of violation days
<div style="border: 1px solid black; padding: 2px; margin-bottom: 2px;">daily</div> <div style="border: 1px solid black; padding: 2px; margin-bottom: 2px;">weekly</div> <div style="border: 1px solid black; padding: 2px; margin-bottom: 2px;">monthly</div> <div style="border: 1px solid black; padding: 2px; margin-bottom: 2px;">quarterly</div> <div style="border: 1px solid black; padding: 2px; margin-bottom: 2px;">semiannual</div> <div style="border: 1px solid black; padding: 2px; margin-bottom: 2px;">annual</div> <div style="border: 1px solid black; padding: 2px;">single event</div>	<div style="border: 1px solid black; width: 50px; height: 20px;"></div> <div style="border: 1px solid black; width: 50px; height: 20px;"></div> <div style="border: 1px solid black; width: 50px; height: 20px;"></div> <div style="border: 1px solid black; width: 50px; height: 20px;"></div> <div style="border: 1px solid black; width: 50px; height: 20px;"></div> <div style="border: 1px solid black; width: 50px; height: 20px; text-align: center;">x</div>	
Violation Base Penalty		\$3,750
One single event is recommended for the missing record.		
Good Faith Efforts to Comply		
0.0%		Reduction \$0
Before NOE/NOV NOE/NOV to EDPRP/Settlement Offer		
Extraordinary Ordinary N/A	<div style="border: 1px solid black; width: 100px; height: 20px;"></div> <div style="border: 1px solid black; width: 100px; height: 20px;"></div> <div style="border: 1px solid black; width: 100px; height: 20px; text-align: center;">x</div>	
Notes	The Respondent does not meet the good faith criteria for this violation.	
Violation Subtotal		\$3,750
Economic Benefit (EB) for this violation		
Statutory Limit Test		
Estimated EB Amount		\$290
Violation Final Penalty Total		\$7,125
This violation Final Assessed Penalty (adjusted for limits)		\$7,125

Economic Benefit Worksheet

Respondent SI Group, Inc.
Case ID No. 59891
Reg. Ent. Reference No. RN100218999
Media Air
Violation No. 1

Percent Interest	Years of Depreciation
5.0	15

Item Description	Item Cost	Date Required	Final Date	Yrs	Interest Saved	Costs Saved	EB Amount
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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

Estimated cost to 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. The Date Required is the investigation date and the Final Date is the estimated 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	\$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

Screening Date 22-Sep-2020 Respondent SI Group, Inc. Case ID No. 59891 Reg. Ent. Reference No. RN100218999 Media Air Enf. Coordinator Danielle Porras	Docket No. 2020-1255-AIR-E	PCW <i>Policy Revision 4 (April 2014)</i> <i>PCW Revision March 26, 2014</i>
Violation Number 2		
Rule Cite(s) 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)		
Violation Description 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.		
Base Penalty		\$25,000
>> Environmental, Property and Human Health Matrix		
OR	Release Major Harm Moderate Minor Actual Potential 	Percent 0.0%
	>> Programmatic Matrix	
	Falsification Major Moderate Minor x 	Percent 15.0%
Matrix Notes	100% of the rule requirements are not met.	
Adjustment		\$21,250
		\$3,750
Violation Events		
Number of Violation Events 1		Number of violation days 308
<div style="border-left: 3px solid #4169e1; padding-left: 5px;"> daily weekly monthly quarterly semiannual annual single event </div>	<div style="border: 1px solid black; padding: 2px;"> x </div>	Violation Base Penalty \$3,750
One single event is recommended for the missing record.		
Good Faith Efforts to Comply		
0.0% <small>Before NOE/NOV NOE/NOV to EDPRP/Settlement Offer</small>		Reduction \$0
Extraordinary Ordinary N/A	<div style="border: 1px solid black; padding: 2px;"> x </div>	
Notes	The Respondent does not meet the good faith criteria for this violation.	
Violation Subtotal		\$3,750
Economic Benefit (EB) for this violation		
Estimated EB Amount		\$290
Statutory Limit Test		\$7,125
This violation Final Assessed Penalty (adjusted for limits)		\$7,125

Economic Benefit Worksheet

Respondent SI Group, Inc.
Case ID No. 59891
Reg. Ent. Reference No. RN100218999
Media Air
Violation No. 2

Percent Interest	Years of Depreciation
5.0	15

Item Description	Item Cost	Date Required	Final Date	Yrs	Interest Saved	Costs Saved	EB Amount
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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	Estimated cost to begin maintaining the records of the installation and calibrations for the totalizing fuel flow meters. The Date Required is the investigation date and the Final Date is the estimated 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	\$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

Screening Date 22-Sep-2020 Respondent SI Group, Inc. Case ID No. 59891 Reg. Ent. Reference No. RN100218999 Media Air Enf. Coordinator Danielle Porras	Docket No. 2020-1255-AIR-E	PCW <i>Policy Revision 4 (April 2014)</i> <i>PCW Revision March 26, 2014</i>																
Violation Number 3																		
Rule Cite(s) 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)																		
Violation Description 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.																		
Base Penalty		\$25,000																
>> Environmental, Property and Human Health Matrix																		
OR	<table border="1" style="margin: auto;"> <tr> <td></td> <th colspan="3">Harm</th> </tr> <tr> <td>Release</td> <th>Major</th> <th>Moderate</th> <th>Minor</th> </tr> <tr> <td>Actual</td> <td></td> <td></td> <td>x</td> </tr> <tr> <td>Potential</td> <td></td> <td></td> <td></td> </tr> </table>		Harm			Release	Major	Moderate	Minor	Actual			x	Potential				Percent 15.0%
		Harm																
	Release	Major	Moderate	Minor														
Actual			x															
Potential																		
>> Programmatic Matrix																		
	<table border="1" style="margin: auto;"> <tr> <td></td> <th>Falsification</th> <th>Major</th> <th>Moderate</th> <th>Minor</th> </tr> <tr> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> </table>		Falsification	Major	Moderate	Minor						Percent 0.0%						
	Falsification	Major	Moderate	Minor														
																		
Matrix Notes	Human health or the environment has been exposed to insignificant amounts of pollutants that do not exceed levels that are protective of human health or environmental receptors.																	
Adjustment		\$21,250																
		\$3,750																
Violation Events																		
Number of Violation Events 4		308 Number of violation days																
	<table border="1" style="margin: auto;"> <tr><td>daily</td><td></td></tr> <tr><td>weekly</td><td></td></tr> <tr><td>monthly</td><td></td></tr> <tr><td>quarterly</td><td>x</td></tr> <tr><td>semiannual</td><td></td></tr> <tr><td>annual</td><td></td></tr> <tr><td>single event</td><td></td></tr> </table>	daily		weekly		monthly		quarterly	x	semiannual		annual		single event		Violation Base Penalty \$15,000		
daily																		
weekly																		
monthly																		
quarterly	x																	
semiannual																		
annual																		
single event																		
Four quarterly events are recommended from the November 19, 2019 investigation date to the September 22, 2020 screening date.																		
Good Faith Efforts to Comply		Reduction \$0																
Before NOE/NOV NOE/NOV to EDPRP/Settlement Offer																		
	<table border="1" style="margin: auto;"> <tr> <td>Extraordinary</td> <td></td> <td></td> </tr> <tr> <td>Ordinary</td> <td></td> <td></td> </tr> <tr> <td>N/A</td> <td>x</td> <td></td> </tr> </table>	Extraordinary			Ordinary			N/A	x									
Extraordinary																		
Ordinary																		
N/A	x																	
Notes	The Respondent does not meet the good faith criteria for this violation.																	
Violation Subtotal		\$15,000																
Economic Benefit (EB) for this violation																		
Estimated EB Amount		\$1,092																
Statutory Limit Test		\$28,500																
Violation Final Penalty Total		\$28,500																
This violation Final Assessed Penalty (adjusted for limits)		\$28,500																

Economic Benefit Worksheet

Respondent SI Group, Inc.
Case ID No. 59891
Reg. Ent. Reference No. RN100218999
Media Air
Violation No. 3

Percent Interest	Years of Depreciation
5.0	15

Item Description	Item Cost	Date Required	Final Date	Yrs	Interest Saved	Costs Saved	EB Amount
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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

Notes for DELAYED costs

Estimated cost to obtain an amendment for NSR Permit No. 2341 to authorize the chemicals used in storage and loading operations that are not on the Approved Chemicals List. The Date Required is the investigation date and the Final Date is the estimated 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	\$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

Screening Date 22-Sep-2020 Respondent SI Group, Inc. Case ID No. 59891 Reg. Ent. Reference No. RN100218999 Media Air Enf. Coordinator Danielle Porras	Docket No. 2020-1255-AIR-E	PCW <i>Policy Revision 4 (April 2014)</i> <i>PCW Revision March 26, 2014</i>
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Violation Number	4	
Rule Cite(s)		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)
Violation Description		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.

Base Penalty	\$25,000
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>> Environmental, Property and Human Health Matrix

OR		Release	Harm			
		Major	Moderate	Minor		
	Actual					
	Potential					

Percent 0.0%

>> Programmatic Matrix

	Major	Moderate	Minor		
Falsification				x	

Percent 1.0%

Matrix Notes	Less than 30% of the rule requirements were not met.
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Adjustment	\$24,750
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	\$250
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Violation Events

Number of Violation Events	1	680	Number of violation days
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	daily				
	weekly				
	monthly				
	quarterly				
	semiannual				
	annual				
	single event	x			

Violation Base Penalty \$250

One single event is recommended for the incomplete record.	
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Good Faith Efforts to Comply

	0.0%		
	Before NOE/NOV	NOE/NOV to EDPRP/Settlement Offer	
Extraordinary			
Ordinary			
N/A	x		
Notes	The Respondent does not meet the good faith criteria for this violation.		

Reduction \$0

Violation Subtotal	\$250
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Economic Benefit (EB) for this violation

	\$367	
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Estimated EB Amount

Statutory Limit Test

	\$475	
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Violation Final Penalty Total

This violation Final Assessed Penalty (adjusted for limits)	\$475
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Economic Benefit Worksheet

Respondent SI Group, Inc.
Case ID No. 59891
Reg. Ent. Reference No. RN100218999
Media Air
Violation No. 4

Percent Interest	Years of Depreciation
5.0	15

Item Description	Item Cost	Date Required	Final Date	Yrs	Interest Saved	Costs Saved	EB Amount
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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-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

Estimated cost to 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. The Date Required is the effective date of the revised permit and the Final Date is the estimated 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	\$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

\$367

Screening Date 22-Sep-2020 Respondent SI Group, Inc. Case ID No. 59891 Reg. Ent. Reference No. RN100218999 Media Air Enf. Coordinator Danielle Porras	Docket No. 2020-1255-AIR-E	PCW <i>Policy Revision 4 (April 2014)</i> <i>PCW Revision March 26, 2014</i>																
Violation Number 5																		
Rule Cite(s) 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)																		
Violation Description 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.																		
Base Penalty		\$25,000																
>> Environmental, Property and Human Health Matrix																		
OR	<table border="1" style="margin: auto;"> <tr> <td></td> <th colspan="3">Harm</th> </tr> <tr> <th>Release</th> <th>Major</th> <th>Moderate</th> <th>Minor</th> </tr> <tr> <td>Actual</td> <td></td> <td></td> <td></td> </tr> <tr> <td>Potential</td> <td></td> <td></td> <td></td> </tr> </table>		Harm			Release	Major	Moderate	Minor	Actual				Potential				Percent 0.0%
		Harm																
	Release	Major	Moderate	Minor														
Actual																		
Potential																		
>> Programmatic Matrix																		
	<table border="1" style="margin: auto;"> <tr> <td></td> <th>Falsification</th> <th>Major</th> <th>Moderate</th> <th>Minor</th> </tr> <tr> <td></td> <td></td> <td></td> <td></td> <td>x</td> </tr> </table>		Falsification	Major	Moderate	Minor					x	Percent 1.0%						
	Falsification	Major	Moderate	Minor														
				x														
Matrix Notes	Less than 30% of the rule requirements were not met.																	
Adjustment		\$24,750																
		\$250																
Violation Events																		
Number of Violation Events 1		680 Number of violation days																
	<table border="1" style="margin: auto;"> <tr><td>daily</td><td></td></tr> <tr><td>weekly</td><td></td></tr> <tr><td>monthly</td><td></td></tr> <tr><td>quarterly</td><td></td></tr> <tr><td>semiannual</td><td></td></tr> <tr><td>annual</td><td></td></tr> <tr><td>single event</td><td>x</td></tr> </table>	daily		weekly		monthly		quarterly		semiannual		annual		single event	x	Violation Base Penalty \$250		
daily																		
weekly																		
monthly																		
quarterly																		
semiannual																		
annual																		
single event	x																	
One single event is recommended for the incomplete record.																		
Good Faith Efforts to Comply		Reduction \$0																
<div style="display: flex; justify-content: space-between;"> Before NOE/NOV NOE/NOV to EDPRP/Settlement Offer </div> <table border="1" style="width: 100%; margin-top: 5px;"> <tr> <td>Extraordinary</td> <td></td> <td></td> </tr> <tr> <td>Ordinary</td> <td></td> <td></td> </tr> <tr> <td>N/A</td> <td>x</td> <td></td> </tr> </table>			Extraordinary			Ordinary			N/A	x								
Extraordinary																		
Ordinary																		
N/A	x																	
Notes	The Respondent does not meet the good faith criteria for this violation.																	
Violation Subtotal		\$250																
Economic Benefit (EB) for this violation																		
Estimated EB Amount		\$367																
Statutory Limit Test		\$475																
Violation Final Penalty Total		\$475																
This violation Final Assessed Penalty (adjusted for limits)		\$475																

Economic Benefit Worksheet

Respondent SI Group, Inc.
Case ID No. 59891
Reg. Ent. Reference No. RN100218999
Media Air
Violation No. 5

Percent Interest	Years of Depreciation
5.0	15

Item Description	Item Cost	Date Required	Final Date	Yrs	Interest Saved	Costs Saved	EB 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				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

Estimated cost to 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. The Date Required is the effective date of the revised permit and the Final Date is the estimated 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	\$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

\$367

Screening Date 22-Sep-2020 Respondent SI Group, Inc. Case ID No. 59891 Reg. Ent. Reference No. RN100218999 Media Air Enf. Coordinator Danielle Porras	Docket No. 2020-1255-AIR-E	PCW <small>Policy Revision 4 (April 2014)</small> <small>PCW Revision March 26, 2014</small>
Violation Number 6		
Rule Cite(s) 30 Tex. Admin. Code §§ 116.115(c) and 122.143(4), NSR Permit No. 2341, SC Nos. 12.A and 21, FOP No. O1431, GTC and STC No. 11, and Tex. Health & Safety Code § 382.085(b)		
Violation Description <div style="border: 1px solid black; padding: 5px; margin-top: 5px;"> 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. </div>		
Base Penalty		\$25,000
>> Environmental, Property and Human Health Matrix		
OR	Release	Harm Major Moderate Minor
	Actual	<div style="display: flex; justify-content: space-around;"> <div style="border: 1px solid black; width: 40px; height: 15px;"></div> <div style="border: 1px solid black; width: 40px; height: 15px;"></div> <div style="border: 1px solid black; width: 40px; height: 15px;"></div> </div>
	Potential	<div style="display: flex; justify-content: space-around;"> <div style="border: 1px solid black; width: 40px; height: 15px;"></div> <div style="border: 1px solid black; width: 40px; height: 15px;"></div> <div style="border: 1px solid black; width: 40px; height: 15px;"></div> </div>
		Percent 0.0%
>> Programmatic Matrix		
	Falsification	Major Moderate Minor
	<div style="border: 1px solid black; width: 40px; height: 15px;"></div>	<div style="display: flex; justify-content: space-around;"> <div style="border: 1px solid black; width: 40px; height: 15px;"></div> <div style="border: 1px solid black; width: 40px; height: 15px;"></div> <div style="border: 1px solid black; width: 40px; height: 15px; text-align: center;">x</div> </div>
		Percent 1.0%
Matrix Notes	Less than 30% of the rule requirements were not met.	
Adjustment		\$24,750
		\$250
Violation Events		
Number of Violation Events 1		636 Number of violation days
	<div style="border: 1px solid black; padding: 2px;"> daily weekly monthly quarterly semiannual annual single event </div>	<div style="display: flex; flex-direction: column; align-items: center;"> <div style="border: 1px solid black; width: 40px; height: 15px; margin-bottom: 2px;"></div> <div style="border: 1px solid black; width: 40px; height: 15px; margin-bottom: 2px;"></div> <div style="border: 1px solid black; width: 40px; height: 15px; margin-bottom: 2px;"></div> <div style="border: 1px solid black; width: 40px; height: 15px; margin-bottom: 2px;"></div> <div style="border: 1px solid black; width: 40px; height: 15px; margin-bottom: 2px;"></div> <div style="border: 1px solid black; width: 40px; height: 15px; margin-bottom: 2px;"></div> <div style="border: 1px solid black; width: 40px; height: 15px; text-align: center;">x</div> </div>
		Violation Base Penalty \$250
One single event is recommended for the incomplete record.		
Good Faith Efforts to Comply		
0.0%		Reduction \$0
Before NOE/NOV NOE/NOV to EDPRP/Settlement Offer		
Extraordinary	<div style="border: 1px solid black; width: 100px; height: 15px;"></div>	
Ordinary	<div style="border: 1px solid black; width: 100px; height: 15px;"></div>	
N/A	<div style="border: 1px solid black; width: 100px; height: 15px; text-align: center;">x</div>	
Notes	The Respondent does not meet the good faith criteria for this violation.	
Violation Subtotal		\$250
Economic Benefit (EB) for this violation		
Statutory Limit Test		
Estimated EB Amount	\$358	Violation Final Penalty Total \$475
This violation Final Assessed Penalty (adjusted for limits)		\$475

Economic Benefit Worksheet

Respondent SI Group, Inc.
Case ID No. 59891
Reg. Ent. Reference No. RN100218999
Media Air
Violation No. 6

Percent Interest	Years of Depreciation
5.0	15

Item Description	Item Cost	Date Required	Final Date	Yrs	Interest Saved	Costs Saved	EB Amount
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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	\$0	n/a	\$0

Notes for DELAYED costs

Estimated cost to 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 in NSR Permit No. 2341 and maintain these records for at least five years. The Date Required is the effective date of the special condition and the Final Date is the estimated 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	\$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

\$358

Screening Date 22-Sep-2020 Respondent SI Group, Inc. Case ID No. 59891 Reg. Ent. Reference No. RN100218999 Media Air Enf. Coordinator Danielle Porras	Docket No. 2020-1255-AIR-E	PCW <i>Policy Revision 4 (April 2014)</i> <i>PCW Revision March 26, 2014</i>
Violation Number 7		
Rule Cite(s) 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)		
Violation Description 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.		
Base Penalty		\$25,000
>> Environmental, Property and Human Health Matrix		
OR	Release Actual Potential	Harm Major Moderate Minor
Percent		0.0%
>> Programmatic Matrix		
	Falsification Major Moderate Minor	
		x
Percent		1.0%
Matrix Notes	Less than 30% of the rule requirements were not met.	
Adjustment		\$24,750
		\$250
Violation Events		
Number of Violation Events		1
		636
		Number of violation days
daily weekly monthly quarterly semiannual annual single event		
	x	
Violation Base Penalty		\$250
One single event is recommended for the incomplete record.		
Good Faith Efforts to Comply		
0.0%		Reduction
		\$0
Before NOE/NOV NOE/NOV to EDPRP/Settlement Offer		
Extraordinary		
Ordinary		
N/A	x	
Notes	The Respondent does not meet the good faith criteria for this violation.	
Violation Subtotal		\$250
Economic Benefit (EB) for this violation		
Statutory Limit Test		
Estimated EB Amount	\$358	Violation Final Penalty Total
		\$475
This violation Final Assessed Penalty (adjusted for limits)		\$475

Economic Benefit Worksheet

Respondent SI Group, Inc.
Case ID No. 59891
Reg. Ent. Reference No. RN100218999
Media Air
Violation No. 7

Percent Interest	Years of Depreciation
5.0	15

Item Description	Item Cost	Date Required	Final Date	Yrs	Interest Saved	Costs Saved	EB 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				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	\$0	n/a	\$0

Notes for DELAYED costs

Estimated cost to 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. The Date Required is the effective date of the special condition and the Final Date is the estimated 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	\$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

\$358

Screening Date 22-Sep-2020 Respondent SI Group, Inc. Case ID No. 59891 Reg. Ent. Reference No. RN100218999 Media Air Enf. Coordinator Danielle Porras	Docket No. 2020-1255-AIR-E	PCW <i>Policy Revision 4 (April 2014)</i> <i>PCW Revision March 26, 2014</i>														
Violation Number 8																
Rule Cite(s) 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)																
Violation Description 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.																
Base Penalty		\$25,000														
>> Environmental, Property and Human Health Matrix																
OR	Release <table border="1" style="margin: auto;"> <tr> <td></td> <td style="text-align: center;">Major</td> <td style="text-align: center;">Moderate</td> <td style="text-align: center;">Minor</td> </tr> <tr> <td style="text-align: center;">Actual</td> <td style="border: 1px solid black;"></td> <td style="border: 1px solid black;"></td> <td style="border: 1px solid black;"></td> </tr> <tr> <td style="text-align: center;">Potential</td> <td style="border: 1px solid black;"></td> <td style="border: 1px solid black;"></td> <td style="border: 1px solid black;"></td> </tr> </table>		Major	Moderate	Minor	Actual				Potential				Percent 0.0%		
		Major	Moderate	Minor												
Actual																
Potential																
>> Programmatic Matrix																
Matrix Notes	<table border="1" style="margin: auto;"> <tr> <td></td> <td style="text-align: center;">Major</td> <td style="text-align: center;">Moderate</td> <td style="text-align: center;">Minor</td> </tr> <tr> <td style="text-align: center;">Falsification</td> <td style="border: 1px solid black;"></td> <td style="border: 1px solid black;"></td> <td style="border: 1px solid black; text-align: center;">x</td> </tr> </table>		Major	Moderate	Minor	Falsification			x	Percent 1.0%						
		Major	Moderate	Minor												
Falsification			x													
Less than 30% of the rule requirements were not met.		Adjustment \$24,750														
		\$250														
Violation Events																
Number of Violation Events 1		636 Number of violation days														
<table border="1" style="width: 100%;"> <tr><td>daily</td><td style="border: 1px solid black;"></td></tr> <tr><td>weekly</td><td style="border: 1px solid black;"></td></tr> <tr><td>monthly</td><td style="border: 1px solid black;"></td></tr> <tr><td>quarterly</td><td style="border: 1px solid black;"></td></tr> <tr><td>semiannual</td><td style="border: 1px solid black;"></td></tr> <tr><td>annual</td><td style="border: 1px solid black;"></td></tr> <tr><td>single event</td><td style="border: 1px solid black; text-align: center;">x</td></tr> </table>	daily		weekly		monthly		quarterly		semiannual		annual		single event	x	Violation Base Penalty \$250	
daily																
weekly																
monthly																
quarterly																
semiannual																
annual																
single event	x															
One single event is recommended for the incomplete record.																
Good Faith Efforts to Comply																
0.0%		Reduction \$0														
Before NOE/NOV NOE/NOV to EDPRP/Settlement Offer																
Extraordinary Ordinary N/A x	Notes: The Respondent does not meet the good faith criteria for this violation.															
Violation Subtotal		\$250														
Economic Benefit (EB) for this violation																
Estimated EB Amount \$358		Statutory Limit Test Violation Final Penalty Total \$475														
This violation Final Assessed Penalty (adjusted for limits)		\$475														

Economic Benefit Worksheet

Respondent SI Group, Inc.
Case ID No. 59891
Reg. Ent. Reference No. RN100218999
Media Air
Violation No. 8

Percent Interest	Years of Depreciation
5.0	15

Item Description	Item Cost	Date Required	Final Date	Yrs	Interest Saved	Costs Saved	EB Amount
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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	\$0	n/a	\$0

Notes for DELAYED costs

Estimated cost to 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. The Date Required is the effective date of the special condition and the Final Date is the estimated 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	\$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

\$358

Screening Date 22-Sep-2020 Respondent SI Group, Inc. Case ID No. 59891 Reg. Ent. Reference No. RN100218999 Media Air Enf. Coordinator Danielle Porras	Docket No. 2020-1255-AIR-E	PCW <i>Policy Revision 4 (April 2014)</i> <i>PCW Revision March 26, 2014</i>
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Violation Number	9		
Rule Cite(s)	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)		
Violation Description	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.		

Base Penalty	\$25,000
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>> Environmental, Property and Human Health Matrix

OR		Harm				
	Release	Major	Moderate	Minor		
	Actual					
	Potential				Percent	0.0%

>> Programmatic Matrix

	Falsification	Major	Moderate	Minor		
				x		
					Percent	1.0%

Matrix Notes	Less than 30% of the rule requirements were not met.
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Adjustment	\$24,750
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	\$250
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Violation Events

Number of Violation Events	1	1639	Number of violation days
----------------------------	---	------	--------------------------

	daily		
	weekly		
	monthly		
	quarterly		
	semiannual		
	annual		
	single event	x	

Violation Base Penalty	\$250
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One single event is recommended for the incomplete record.
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Good Faith Efforts to Comply

0.0%	Reduction	\$0
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	Before NOE/NOV	NOE/NOV to EDPRP/Settlement Offer	
Extraordinary			
Ordinary			
N/A	x		

Notes	The Respondent does not meet the good faith criteria for this violation.
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Violation Subtotal	\$250
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Economic Benefit (EB) for this violation

Estimated EB Amount	\$564	Statutory Limit Test
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Violation Final Penalty Total	\$475
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This violation Final Assessed Penalty (adjusted for limits)	\$475
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Economic Benefit Worksheet

Respondent SI Group, Inc.
Case ID No. 59891
Reg. Ent. Reference No. RN100218999
Media Air
Violation No. 9

Percent Interest	Years of Depreciation
5.0	15

Item Description	Item Cost	Date Required	Final Date	Yrs	Interest Saved	Costs Saved	EB Amount
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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)				0.00	\$0	n/a	\$0

Notes for DELAYED costs

Estimated cost to 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. The Date Required is the first date of non-compliance and the Final Date is the estimated 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	\$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

\$564

Screening Date 22-Sep-2020 Respondent SI Group, Inc. Case ID No. 59891 Reg. Ent. Reference No. RN100218999 Media Air Enf. Coordinator Danielle Porras	Docket No. 2020-1255-AIR-E	PCW <i>Policy Revision 4 (April 2014)</i> <i>PCW Revision March 26, 2014</i>			
Violation Number <input style="width: 50px;" type="text" value="10"/>					
Rule Cite(s) 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. O1431, GTC and STC No. 11, and Tex. Health & Safety Code § 382.085(b)					
Violation Description 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.					
Base Penalty		<input style="width: 100px;" type="text" value="\$25,000"/>			
>> Environmental, Property and Human Health Matrix					
OR	Release	Harm			
		Major Moderate Minor			
	Actual Potential	<input style="width: 50px;" type="text"/> <input style="width: 50px;" type="text"/>	<input style="width: 50px;" type="text"/> <input style="width: 50px;" type="text"/>	<input style="width: 50px;" type="text"/> <input style="width: 50px;" type="text"/>	<input style="width: 50px;" type="text"/> <input style="width: 50px;" type="text"/>
>> Programmatic Matrix					
	Falsification	Major	Moderate	Minor	
	<input style="width: 50px;" type="text"/>	<input style="width: 50px;" type="text"/>	<input style="width: 50px;" type="text"/>	<input style="width: 50px;" type="text" value="x"/>	Percent <input style="width: 50px;" type="text" value="1.0%"/>
Matrix Notes	Less than 30% of the rule requirements were not met.				
Adjustment					<input style="width: 100px;" type="text" value="\$24,750"/>
					<input style="width: 100px;" type="text" value="\$250"/>
Violation Events					
Number of Violation Events		<input style="width: 50px;" type="text" value="1"/>	Number of violation days		<input style="width: 50px;" type="text" value="1639"/>
	daily weekly monthly quarterly semiannual annual single event	<input style="width: 50px;" type="text"/> <input style="width: 50px;" type="text"/> <input style="width: 50px;" type="text"/> <input style="width: 50px;" type="text"/> <input style="width: 50px;" type="text"/> <input style="width: 50px;" type="text"/> <input style="width: 50px;" type="text" value="x"/>	Violation Base Penalty <input style="width: 100px;" type="text" value="\$250"/>		
One single event is recommended for the incomplete record.					
Good Faith Efforts to Comply		0.0%	Reduction		<input style="width: 50px;" type="text" value="\$0"/>
		Before NOE/NOV NOE/NOV to EDPRP/Settlement Offer			
	Extraordinary	<input style="width: 50px;" type="text"/>			
	Ordinary	<input style="width: 50px;" type="text"/>			
	N/A	<input style="width: 50px;" type="text" value="x"/>			
	Notes	The Respondent does not meet the good faith criteria for this violation.			
Violation Subtotal					<input style="width: 100px;" type="text" value="\$250"/>
Economic Benefit (EB) for this violation			Statutory Limit Test		
Estimated EB Amount		<input style="width: 100px;" type="text" value="\$564"/>	Violation Final Penalty Total		<input style="width: 100px;" type="text" value="\$475"/>
This violation Final Assessed Penalty (adjusted for limits)					<input style="width: 100px;" type="text" value="\$475"/>

Economic Benefit Worksheet

Respondent SI Group, Inc.
Case ID No. 59891
Reg. Ent. Reference No. RN100218999
Media Air
Violation No. 10

Percent Interest	Years of Depreciation
5.0	15

Item Description	Item Cost	Date Required	Final Date	Yrs	Interest Saved	Costs Saved	EB Amount
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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)				0.00	\$0	n/a	\$0

Notes for DELAYED costs

Estimated cost to 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. The Date Required is the first date of non-compliance and the Final Date is the estimated 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	\$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

\$564

Screening Date 22-Sep-2020 Respondent SI Group, Inc. Case ID No. 59891 Reg. Ent. Reference No. RN100218999 Media Air Enf. Coordinator Danielle Porras	Docket No. 2020-1255-AIR-E	PCW <i>Policy Revision 4 (April 2014)</i> <i>PCW Revision March 26, 2014</i>														
Violation Number 11																
Rule Cite(s) 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. O1431, GTC and STC No. 11, and Tex. Health & Safety Code § 382.085(b)																
Violation Description 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.																
Base Penalty		\$25,000														
>> Environmental, Property and Human Health Matrix																
OR	Release	Harm														
		Major Moderate Minor														
	Actual Potential	<table border="1" style="width: 100%; border-collapse: collapse;"> <tr><td style="width: 33%; height: 20px;"></td><td style="width: 33%; height: 20px;"></td><td style="width: 33%; height: 20px;"></td></tr> <tr><td style="height: 20px;"></td><td style="height: 20px;"></td><td style="height: 20px;"></td></tr> </table>							Percent 0.0%							
>> Programmatic Matrix																
	Falsification	Major Moderate Minor														
	<table border="1" style="width: 100%; border-collapse: collapse;"> <tr><td style="width: 33%; height: 20px;"></td><td style="width: 33%; height: 20px;"></td><td style="width: 33%; height: 20px;"></td></tr> <tr><td style="height: 20px;"></td><td style="height: 20px;"></td><td style="height: 20px; text-align: center;">x</td></tr> </table>						x	Percent 1.0%								
		x														
Matrix Notes	Less than 30% of the rule requirements were not met.															
Adjustment		\$24,750														
		\$250														
Violation Events																
Number of Violation Events		1														
		1639 Number of violation days														
	<table border="1" style="width: 100%; border-collapse: collapse;"> <tr><td style="width: 30px;">daily</td><td style="width: 100px; height: 20px;"></td></tr> <tr><td>weekly</td><td style="height: 20px;"></td></tr> <tr><td>monthly</td><td style="height: 20px;"></td></tr> <tr><td>quarterly</td><td style="height: 20px;"></td></tr> <tr><td>semiannual</td><td style="height: 20px;"></td></tr> <tr><td>annual</td><td style="height: 20px;"></td></tr> <tr><td>single event</td><td style="height: 20px; text-align: center;">x</td></tr> </table>	daily		weekly		monthly		quarterly		semiannual		annual		single event	x	Violation Base Penalty \$250
daily																
weekly																
monthly																
quarterly																
semiannual																
annual																
single event	x															
One single event is recommended for the incomplete record.																
Good Faith Efforts to Comply		<div style="display: flex; justify-content: space-between;"> 0.0% Reduction </div> <div style="display: flex; justify-content: space-between;"> Before NOE/NOV NOE/NOV to EDPRP/Settlement Offer \$0 </div> <table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 30px;">Extraordinary</td> <td style="width: 100px; height: 20px;"></td> <td style="width: 100px; height: 20px;"></td> </tr> <tr> <td>Ordinary</td> <td style="height: 20px;"></td> <td style="height: 20px;"></td> </tr> <tr> <td>N/A</td> <td style="text-align: center;">x</td> <td style="height: 20px;"></td> </tr> </table> <div style="border: 1px solid black; padding: 5px; margin-top: 5px;"> Notes: The Respondent does not meet the good faith criteria for this violation. </div>	Extraordinary			Ordinary			N/A	x						
Extraordinary																
Ordinary																
N/A	x															
Violation Subtotal		\$250														
Economic Benefit (EB) for this violation Statutory Limit Test																
Estimated EB Amount		\$414														
Violation Final Penalty Total		\$475														
This violation Final Assessed Penalty (adjusted for limits)		\$475														

Economic Benefit Worksheet

Respondent SI Group, Inc.
Case ID No. 59891
Reg. Ent. Reference No. RN100218999
Media Air
Violation No. 11

Percent Interest	Years of Depreciation
5.0	15

Item Description	Item Cost	Date Required	Final Date	Yrs	Interest Saved	Costs Saved	EB Amount
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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-Mar-2018	1-Oct-2023	5.52	\$414	n/a	\$414
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	Estimated cost to 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. The Date Required is the first date of non-compliance and the Final Date is the estimated 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	\$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 \$414

Screening Date 22-Sep-2020 Respondent SI Group, Inc. Case ID No. 59891 Reg. Ent. Reference No. RN100218999 Media Air Enf. Coordinator Danielle Porras	Docket No. 2020-1255-AIR-E	PCW <i>Policy Revision 4 (April 2014)</i> <i>PCW Revision March 26, 2014</i>
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Violation Number	12	Rule Cite(s)	
		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)	
Violation Description		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.	

Base Penalty	\$25,000
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>> Environmental, Property and Human Health Matrix

OR	Harm					
	Release	Major	Moderate	Minor		
	Actual					
	Potential					
					Percent	0.0%

>> Programmatic Matrix

	Falsification					
	Major	Moderate	Minor			
			x			
					Percent	1.0%

Matrix Notes	Less than 30% of the rule requirements were not met.
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Adjustment	\$24,750
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	\$250
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Violation Events

Number of Violation Events	1		Number of violation days	1639
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	daily		
	weekly		
	monthly		
	quarterly		
	semiannual		
	annual		
	single event	x	

Violation Base Penalty	\$250
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One single event is recommended for the incomplete record.	
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Good Faith Efforts to Comply

	0.0%	
	Before NOE/NOV	NOE/NOV to EDPRP/Settlement Offer
Extraordinary		
Ordinary		
N/A	x	
Notes	The Respondent does not meet the good faith criteria for this violation.	

Violation Subtotal	\$250
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Economic Benefit (EB) for this violation

Estimated EB Amount	\$564	
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Statutory Limit Test

Violation Final Penalty Total	\$475	
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This violation Final Assessed Penalty (adjusted for limits)	\$475
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Economic Benefit Worksheet

Respondent SI Group, Inc.
Case ID No. 59891
Reg. Ent. Reference No. RN100218999
Media Air
Violation No. 12

Percent Interest	Years of Depreciation
5.0	15

Item Description	Item Cost	Date Required	Final Date	Yrs	Interest Saved	Costs Saved	EB Amount
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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)				0.00	\$0	n/a	\$0

Notes for DELAYED costs

Estimated cost to 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. The Date Required is the first date of non-compliance and the Final Date is the estimated 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	\$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

\$564

Screening Date 22-Sep-2020 Respondent SI Group, Inc. Case ID No. 59891 Reg. Ent. Reference No. RN100218999 Media Air Enf. Coordinator Danielle Porras	Docket No. 2020-1255-AIR-E	PCW <small>Policy Revision 4 (April 2014) PCW Revision March 26, 2014</small>																
<table style="width:100%;"> <tr> <td style="width:25%;">Violation Number</td> <td style="width:15%; border: 1px solid black; text-align: center;">13</td> <td style="width:60%;"></td> </tr> <tr> <td>Rule Cite(s)</td> <td colspan="2" style="border: 1px solid black; padding: 5px;"> 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. O1431, GTC and STC No. 11, and Tex. Health & Safety Code § 382.085(b) </td> </tr> <tr> <td>Violation Description</td> <td colspan="2" style="border: 1px solid black; padding: 5px;"> 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. </td> </tr> </table>			Violation Number	13		Rule Cite(s)	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. O1431, GTC and STC No. 11, and Tex. Health & Safety Code § 382.085(b)		Violation Description	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.								
Violation Number	13																	
Rule Cite(s)	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. O1431, GTC and STC No. 11, and Tex. Health & Safety Code § 382.085(b)																	
Violation Description	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.																	
Base Penalty		\$25,000																
>> Environmental, Property and Human Health Matrix																		
OR	<table style="margin: auto;"> <tr> <td style="text-align: center;">Release</td> <td colspan="3" style="text-align: center;">Harm</td> </tr> <tr> <td></td> <td style="text-align: center;">Major</td> <td style="text-align: center;">Moderate</td> <td style="text-align: center;">Minor</td> </tr> <tr> <td style="text-align: center;">Actual</td> <td style="border: 1px solid black; width: 60px; height: 20px;"></td> <td style="border: 1px solid black; width: 60px; height: 20px;"></td> <td style="border: 1px solid black; width: 60px; height: 20px;"></td> </tr> <tr> <td style="text-align: center;">Potential</td> <td style="border: 1px solid black; width: 60px; height: 20px;"></td> <td style="border: 1px solid black; width: 60px; height: 20px;"></td> <td style="border: 1px solid black; width: 60px; height: 20px;"></td> </tr> </table>	Release	Harm				Major	Moderate	Minor	Actual				Potential				Percent 0.0%
	Release	Harm																
		Major	Moderate	Minor														
Actual																		
Potential																		
>> Programmatic Matrix																		
	<table style="margin: auto;"> <tr> <td style="text-align: center;">Falsification</td> <td style="text-align: center;">Major</td> <td style="text-align: center;">Moderate</td> <td style="text-align: center;">Minor</td> </tr> <tr> <td style="border: 1px solid black; width: 60px; height: 20px;"></td> <td style="border: 1px solid black; width: 60px; height: 20px;"></td> <td style="border: 1px solid black; width: 60px; height: 20px;"></td> <td style="border: 1px solid black; width: 60px; height: 20px; text-align: center;">x</td> </tr> </table>	Falsification	Major	Moderate	Minor				x	Percent 1.0%								
Falsification	Major	Moderate	Minor															
			x															
Matrix Notes	Less than 30% of the rule requirements were not met.																	
Adjustment		\$24,750																
		\$250																
Violation Events																		
Number of Violation Events 1		1639 Number of violation days																
	<table style="border-collapse: collapse;"> <tr><td style="padding: 2px 5px;">daily</td><td style="border: 1px solid black; width: 60px; height: 20px;"></td></tr> <tr><td style="padding: 2px 5px;">weekly</td><td style="border: 1px solid black; width: 60px; height: 20px;"></td></tr> <tr><td style="padding: 2px 5px;">monthly</td><td style="border: 1px solid black; width: 60px; height: 20px;"></td></tr> <tr><td style="padding: 2px 5px;">quarterly</td><td style="border: 1px solid black; width: 60px; height: 20px;"></td></tr> <tr><td style="padding: 2px 5px;">semiannual</td><td style="border: 1px solid black; width: 60px; height: 20px;"></td></tr> <tr><td style="padding: 2px 5px;">annual</td><td style="border: 1px solid black; width: 60px; height: 20px;"></td></tr> <tr><td style="padding: 2px 5px;">single event</td><td style="border: 1px solid black; width: 60px; height: 20px; text-align: center;">x</td></tr> </table>	daily		weekly		monthly		quarterly		semiannual		annual		single event	x	Violation Base Penalty \$250		
daily																		
weekly																		
monthly																		
quarterly																		
semiannual																		
annual																		
single event	x																	
One single event is recommended for the incomplete record.																		
Good Faith Efforts to Comply		Reduction \$0																
Before NOE/NOV NOE/NOV to EDPRP/Settlement Offer																		
Extraordinary Ordinary N/A	<table style="width:100%;"> <tr><td style="border: 1px solid black; width: 60px; height: 20px;"></td><td style="border: 1px solid black; width: 60px; height: 20px;"></td></tr> <tr><td style="border: 1px solid black; width: 60px; height: 20px;"></td><td style="border: 1px solid black; width: 60px; height: 20px;"></td></tr> <tr><td style="border: 1px solid black; width: 60px; height: 20px; text-align: center;">x</td><td style="border: 1px solid black; width: 60px; height: 20px;"></td></tr> </table>					x												
x																		
Notes	The Respondent does not meet the good faith criteria for this violation.																	
Violation Subtotal		\$250																
Economic Benefit (EB) for this violation																		
Statutory Limit Test																		
Estimated EB Amount	\$564	Violation Final Penalty Total \$475																
This violation Final Assessed Penalty (adjusted for limits)		\$475																

Economic Benefit Worksheet

Respondent SI Group, Inc.
Case ID No. 59891
Reg. Ent. Reference No. RN100218999
Media Air
Violation No. 13

Percent Interest	Years of Depreciation
5.0	15

Item Description	Item Cost	Date Required	Final Date	Yrs	Interest Saved	Costs Saved	EB Amount
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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)				0.00	\$0	n/a	\$0

Notes for DELAYED costs

Estimated cost to 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. The Date Required is the first date of non-compliance and the Final Date is the estimated 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	\$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

\$564

Screening Date 22-Sep-2020 Respondent SI Group, Inc. Case ID No. 59891 Reg. Ent. Reference No. RN100218999 Media Air Enf. Coordinator Danielle Porras	Docket No. 2020-1255-AIR-E	PCW <i>Policy Revision 4 (April 2014)</i> <i>PCW Revision March 26, 2014</i>	
Violation Number 14			
Rule Cite(s) 30 Tex. Admin. Code §§ 116.115(c) and 122.143(4), NSR Permit No. 84092, SC No. 8.D, FOP No. O1431, GTC and STC No. 11, and Tex. Health & Safety Code § 382.085(b)			
Violation Description <div style="border: 1px solid black; padding: 5px; margin-top: 5px;"> 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. </div>			
Base Penalty		\$25,000	
>> Environmental, Property and Human Health Matrix			
OR	Release	Harm	Percent 0.0%
	Major Moderate Minor Actual Potential	<div style="display: flex; justify-content: space-around;"> <div style="border: 1px solid black; width: 40px; height: 20px;"></div> <div style="border: 1px solid black; width: 40px; height: 20px;"></div> <div style="border: 1px solid black; width: 40px; height: 20px;"></div> </div>	
>> Programmatic Matrix			
	Falsification Major Moderate Minor <div style="display: flex; justify-content: space-around;"> <div style="border: 1px solid black; width: 40px; height: 20px;"></div> <div style="border: 1px solid black; width: 40px; height: 20px;"></div> <div style="border: 1px solid black; width: 40px; height: 20px;"></div> <div style="border: 1px solid black; width: 40px; height: 20px; text-align: center;">x</div> </div>		Percent 1.0%
Matrix Notes	Less than 30% of the rule requirements were not met.		
Adjustment		\$24,750	
		\$250	
Violation Events			
Number of Violation Events 1		1639 Number of violation days	
	daily weekly monthly quarterly semiannual annual single event	<div style="display: flex; flex-direction: column; align-items: center;"> <div style="border: 1px solid black; width: 40px; height: 20px;"></div> <div style="border: 1px solid black; width: 40px; height: 20px;"></div> <div style="border: 1px solid black; width: 40px; height: 20px;"></div> <div style="border: 1px solid black; width: 40px; height: 20px;"></div> <div style="border: 1px solid black; width: 40px; height: 20px;"></div> <div style="border: 1px solid black; width: 40px; height: 20px;"></div> <div style="border: 1px solid black; width: 40px; height: 20px; text-align: center;">x</div> </div>	Violation Base Penalty \$250
One single event is recommended for the incomplete record.			
Good Faith Efforts to Comply		0.0%	Reduction \$0
		Before NOE/NOV NOE/NOV to EDPRP/Settlement Offer	
	Extraordinary Ordinary N/A	<div style="display: flex; justify-content: space-around;"> <div style="border: 1px solid black; width: 40px; height: 20px;"></div> <div style="border: 1px solid black; width: 40px; height: 20px;"></div> </div> <div style="display: flex; justify-content: space-around;"> <div style="border: 1px solid black; width: 40px; height: 20px;"></div> <div style="border: 1px solid black; width: 40px; height: 20px;"></div> </div> <div style="display: flex; justify-content: space-around;"> <div style="border: 1px solid black; width: 40px; height: 20px; text-align: center;">x</div> <div style="border: 1px solid black; width: 40px; height: 20px;"></div> </div>	
	Notes	The Respondent does not meet the good faith criteria for this violation.	
Violation Subtotal		\$250	
Economic Benefit (EB) for this violation		Statutory Limit Test	
Estimated EB Amount \$564		Violation Final Penalty Total \$475	
This violation Final Assessed Penalty (adjusted for limits)		\$475	

Economic Benefit Worksheet

Respondent SI Group, Inc.
Case ID No. 59891
Reg. Ent. Reference No. RN100218999
Media Air
Violation No. 14

Percent Interest	Years of Depreciation
5.0	15

Item Description	Item Cost	Date Required	Final Date	Yrs	Interest Saved	Costs Saved	EB Amount
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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)				0.00	\$0	n/a	\$0

Notes for DELAYED costs

Estimated cost to 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. The Date Required is the first date of compliance and the Final Date is the estimated 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	\$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

\$564

Screening Date 22-Sep-2020 Respondent SI Group, Inc. Case ID No. 59891 Reg. Ent. Reference No. RN100218999 Media Air Enf. Coordinator Danielle Porras	Docket No. 2020-1255-AIR-E	PCW <i>Policy Revision 4 (April 2014)</i> <i>PCW Revision March 26, 2014</i>																
Violation Number 15																		
Rule Cite(s) 30 Tex. Admin. Code §§ 106.8(c)(2)(B) and (c)(4), 106.263(g)(3), and 122.143(4), FOP No. O1431, GTC and STC Nos. 12 and 13, and Tex. Health & Safety Code § 382.085(b)																		
Violation Description <div style="border: 1px solid black; padding: 5px; margin-top: 5px;"> 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. </div>																		
Base Penalty		\$25,000																
>> Environmental, Property and Human Health Matrix																		
OR	<table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td></td> <th colspan="3">Harm</th> </tr> <tr> <td></td> <th>Major</th> <th>Moderate</th> <th>Minor</th> </tr> <tr> <td>Actual</td> <td style="border: 1px solid black;"></td> <td style="border: 1px solid black;"></td> <td style="border: 1px solid black;"></td> </tr> <tr> <td>Potential</td> <td style="border: 1px solid black;"></td> <td style="border: 1px solid black;"></td> <td style="border: 1px solid black;"></td> </tr> </table>		Harm				Major	Moderate	Minor	Actual				Potential				Percent 0.0%
		Harm																
		Major	Moderate	Minor														
Actual																		
Potential																		
>> Programmatic Matrix																		
	<table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td></td> <th>Falsification</th> <th>Major</th> <th>Moderate</th> <th>Minor</th> </tr> <tr> <td></td> <td style="border: 1px solid black;"></td> <td style="border: 1px solid black; text-align: center;">x</td> <td style="border: 1px solid black;"></td> <td style="border: 1px solid black;"></td> </tr> </table>		Falsification	Major	Moderate	Minor			x			Percent 15.0%						
	Falsification	Major	Moderate	Minor														
		x																
Matrix Notes	100% of the rule requirements were not met.																	
Adjustment		\$21,250																
		\$3,750																
Violation Events																		
Number of Violation Events 1		308 Number of violation days																
	<table border="1" style="width: 100%; border-collapse: collapse;"> <tr><td>daily</td><td style="border: 1px solid black;"></td></tr> <tr><td>weekly</td><td style="border: 1px solid black;"></td></tr> <tr><td>monthly</td><td style="border: 1px solid black;"></td></tr> <tr><td>quarterly</td><td style="border: 1px solid black;"></td></tr> <tr><td>semiannual</td><td style="border: 1px solid black;"></td></tr> <tr><td>annual</td><td style="border: 1px solid black;"></td></tr> <tr><td>single event</td><td style="border: 1px solid black; text-align: center;">x</td></tr> </table>	daily		weekly		monthly		quarterly		semiannual		annual		single event	x	Violation Base Penalty \$3,750		
daily																		
weekly																		
monthly																		
quarterly																		
semiannual																		
annual																		
single event	x																	
One single event is recommended for the missing record.																		
Good Faith Efforts to Comply		Reduction \$0																
Before NOE/NOV NOE/NOV to EDPRP/Settlement Offer																		
Extraordinary 		Notes The Respondent does not meet the good faith criteria for this violation.																
Ordinary 																		
N/A x																		
Violation Subtotal		\$3,750																
Economic Benefit (EB) for this violation																		
Statutory Limit Test																		
Estimated EB Amount \$290		Violation Final Penalty Total \$7,125																
This violation Final Assessed Penalty (adjusted for limits)		\$7,125																

Economic Benefit Worksheet

Respondent SI Group, Inc.
Case ID No. 59891
Reg. Ent. Reference No. RN100218999
Media Air
Violation No. 15

Percent Interest	Years of Depreciation
5.0	15

Item Description	Item Cost	Date Required	Final Date	Yrs	Interest Saved	Costs Saved	EB Amount
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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

Estimated cost to 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. The Date Required is the investigation date and the Final Date is the estimated 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	\$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

Screening Date 22-Sep-2020 Respondent SI Group, Inc. Case ID No. 59891 Reg. Ent. Reference No. RN100218999 Media Air Enf. Coordinator Danielle Porras	Docket No. 2020-1255-AIR-E	PCW <i>Policy Revision 4 (April 2014)</i> <i>PCW Revision March 26, 2014</i>
Violation Number 16		
Rule Cite(s) 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)		
Violation Description 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.		
Base Penalty		\$25,000
>> Environmental, Property and Human Health Matrix		
OR	Release	Harm
	Major Moderate Minor	
	Actual Potential 	Percent 0.0%
>> Programmatic Matrix		
	Falsification Major Moderate Minor	
	 x 	Percent 15.0%
Matrix Notes	100% of the rule requirements are not met.	
Adjustment		\$21,250
		\$3,750
Violation Events		
Number of Violation Events 2		Number of violation days 308
	daily weekly monthly quarterly semiannual annual single event x	Violation Base Penalty \$7,500
Two single events are recommended for the missing records.		
Good Faith Efforts to Comply		Reduction \$0
Before NOE/NOV NOE/NOV to EDPRP/Settlement Offer		
Extraordinary		
Ordinary		
N/A	x	
Notes	The Respondent does not meet the good faith criteria for this violation.	
Violation Subtotal		\$7,500
Economic Benefit (EB) for this violation		
Statutory Limit Test		
Estimated EB Amount	\$290	Violation Final Penalty Total \$14,250
This violation Final Assessed Penalty (adjusted for limits)		\$14,250

Economic Benefit Worksheet

Respondent SI Group, Inc.
Case ID No. 59891
Reg. Ent. Reference No. RN100218999
Media Air
Violation No. 16

Percent Interest	Years of Depreciation
5.0	15

Item Description	Item Cost	Date Required	Final Date	Yrs	Interest Saved	Costs Saved	EB Amount
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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

Estimated cost to begin maintaining the records of controls used for the pressurized tanks or tanks vented and annual operating hours for the portable and emergency engines and turbines at the Plant and maintain these records for at least five years. The Date Required is the investigation date and the Final Date is the estimated 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	\$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

Screening Date 22-Sep-2020 Respondent SI Group, Inc. Case ID No. 59891 Reg. Ent. Reference No. RN100218999 Media Air Enf. Coordinator Danielle Porras	Docket No. 2020-1255-AIR-E	PCW <i>Policy Revision 4 (April 2014)</i> <i>PCW Revision March 26, 2014</i>
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Violation Number	17	Rule Cite(s)	
		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)	
Violation Description		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 hour from April 5, 2018 to April 14, 2018.	

Base Penalty	\$25,000
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>> Environmental, Property and Human Health Matrix

OR	Release	Harm			Percent	
		Major	Moderate	Minor		
	Actual					
	Potential				0.0%	

>> Programmatic Matrix

OR	Falsification	Major	Moderate	Minor	Percent	
			x			
					1.0%	

Matrix Notes	Less than 30% of the rule requirements were met.
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Adjustment	\$24,750
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	\$250
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Violation Events

Number of Violation Events	5	360	Number of violation days
daily			
weekly			
monthly			
quarterly			
semiannual			
annual			
single event	x		

Violation Base Penalty	\$1,250
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Five single events are recommended (one event for each set of incomplete records).	
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Good Faith Efforts to Comply

	25.0%	
	Before NOE/NOV	NOE/NOV to EDPRP/Settlement Offer
Extraordinary		
Ordinary	x	
N/A		
Notes	The Respondent completed the corrective measures by February 21, 2019, prior to the Notice of Enforcement ("NOE") dated August 28, 2020.	

Violation Subtotal	\$938
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Economic Benefit (EB) for this violation

Estimated EB Amount	\$5,597
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Statutory Limit Test

Violation Final Penalty Total	\$2,063
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This violation Final Assessed Penalty (adjusted for limits)	\$2,063
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Economic Benefit Worksheet

Respondent SI Group, Inc.
Case ID No. 59891
Reg. Ent. Reference No. RN100218999
Media Air
Violation No. 17

Percent Interest	Years of Depreciation
5.0	15

Item Description	Item Cost	Date Required	Final Date	Yrs	Interest Saved	Costs Saved	EB Amount
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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				0.00	\$0	n/a	\$0
Other (as needed)	\$1,500	26-Feb-2018	21-Feb-2019	0.99	\$74	n/a	\$74

Notes for DELAYED costs

Estimated costs to add a third pilot light to Flare X-794, Flare X-401, Flare X-601, and Flare X-695 (\$20,000/flare) and to implement 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 (\$1,500). The Dates Required are the initial date of noncompliance and the Final Dates are the dates 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	\$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

\$81,500

TOTAL

\$5,597

Screening Date 22-Sep-2020 Respondent SI Group, Inc. Case ID No. 59891 Reg. Ent. Reference No. RN100218999 Media Air Enf. Coordinator Danielle Porras	Docket No. 2020-1255-AIR-E	PCW <i>Policy Revision 4 (April 2014)</i> <i>PCW Revision March 26, 2014</i>		
Violation Number 18				
Rule Cite(s) 30 Tex. Admin. Code §§ 116.115(c) and 122.143(4), NSR Permit No. 2341, SC No. 4.D, FOP No. O1431, GTC and STC No. 11, and Tex. Health & Safety Code § 382.085(b)				
Violation Description <div style="border: 1px solid black; padding: 5px; margin-top: 5px;"> 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. </div>				
Base Penalty		\$25,000		
>> Environmental, Property and Human Health Matrix				
OR	Harm			
	Release	Major	Moderate	Minor
	Actual			x
	Potential			
		Percent	15.0%	
>> Programmatic Matrix				
	Falsification	Major	Moderate	Minor
		Percent	0.0%	
Matrix Notes	Human health or the environment has been exposed to insignificant amounts of pollutants that do not exceed levels that are protective of human health or environmental receptors.			
Adjustment		\$21,250		
		\$3,750		
Violation Events				
Number of Violation Events		2	127	
		Number of violation days		
	daily		Violation Base Penalty \$7,500	
	weekly			
	monthly			
	quarterly	x		
	semiannual			
	annual			
	single event			
Two quarterly events are recommended for the instances of non-compliance that occurred from February 22, 2018 to June 19, 2018.				
Good Faith Efforts to Comply		25.0%	Reduction	
		\$1,875		
		Before NOE/NOV	NOE/NOV to EDPRP/Settlement Offer	
	Extraordinary			
	Ordinary	x		
	N/A			
	Notes	The Respondent completed the corrective measures on June 29, 2018, prior to the NOE dated August 28, 2020.		
Violation Subtotal		\$5,625		
Economic Benefit (EB) for this violation		Statutory Limit Test		
Estimated EB Amount		\$87	Violation Final Penalty Total	
		\$12,375		
This violation Final Assessed Penalty (adjusted for limits)		\$12,375		

Economic Benefit Worksheet

Respondent SI Group, Inc.
Case ID No. 59891
Reg. Ent. Reference No. RN100218999
Media Air
Violation No. 18

Percent Interest	Years of Depreciation
5.0	15

Item Description	Item Cost	Date Required	Final Date	Yrs	Interest Saved	Costs Saved	EB Amount
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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

Estimated cost to amend NSR Permit No. 2341 that removed the waste gas stream flow limit to Flare X-501. The Date Required is the first date of non-compliance 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	\$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

Screening Date 22-Sep-2020 Respondent SI Group, Inc. Case ID No. 59891 Reg. Ent. Reference No. RN100218999 Media Air Enf. Coordinator Danielle Porras	Docket No. 2020-1255-AIR-E	PCW <i>Policy Revision 4 (April 2014)</i> <i>PCW Revision March 26, 2014</i>							
Violation Number 19									
Rule Cite(s) 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)									
Violation Description Failed to maintain records of the sulfur dioxide ("SO2") emissions data and fuel sampling data for the fuel oil used as raw material.									
Base Penalty		\$25,000							
>> Environmental, Property and Human Health Matrix									
OR	Release	Harm							
	Major Moderate Minor								
	Actual Potential	<table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 33%; height: 20px;"></td> <td style="width: 33%; height: 20px;"></td> <td style="width: 33%; height: 20px;"></td> </tr> <tr> <td style="height: 20px;"></td> <td style="height: 20px;"></td> <td style="height: 20px;"></td> </tr> </table>							
		Percent 0.0%							
>> Programmatic Matrix									
	Falsification Major Moderate Minor								
	<table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 25%; height: 20px;"></td> <td style="width: 25%; height: 20px; text-align: center;">x</td> <td style="width: 25%; height: 20px;"></td> <td style="width: 25%; height: 20px;"></td> </tr> </table>		x			Percent 15.0%			
	x								
Matrix Notes	100% of the rule requirements were not met.								
Adjustment		\$21,250							
		\$3,750							
Violation Events									
Number of Violation Events 1		73 Number of violation days							
	<div style="border: 1px solid black; padding: 2px;"> daily weekly monthly quarterly semiannual annual single event </div>	<table border="1" style="width: 100%; border-collapse: collapse;"> <tr><td style="height: 20px;"></td></tr> <tr><td style="height: 20px;"></td></tr> <tr><td style="height: 20px;"></td></tr> <tr><td style="height: 20px;"></td></tr> <tr><td style="height: 20px;"></td></tr> <tr><td style="height: 20px;"></td></tr> <tr><td style="height: 20px; text-align: center;">x</td></tr> </table>							x
x									
		Violation Base Penalty \$3,750							
One single event is recommended for the missing record.									
Good Faith Efforts to Comply		25.0% Before NOE/NOV NOE/NOV to EDPRP/Settlement Offer							
		Reduction \$937							
	Extraordinary Ordinary N/A	<table border="1" style="width: 100%; border-collapse: collapse;"> <tr><td style="height: 20px;"></td></tr> <tr><td style="height: 20px; text-align: center;">x</td></tr> <tr><td style="height: 20px;"></td></tr> </table>		x					
x									
	Notes The Respondent completed the corrective measures on January 31, 2020, prior to the NOE dated August 28, 2020.								
Violation Subtotal		\$2,813							
Economic Benefit (EB) for this violation									
Statutory Limit Test									
Estimated EB Amount	\$15	Violation Final Penalty Total \$6,188							
This violation Final Assessed Penalty (adjusted for limits)		\$6,188							

Economic Benefit Worksheet

Respondent SI Group, Inc.
Case ID No. 59891
Reg. Ent. Reference No. RN100218999
Media Air
Violation No. 19

Percent Interest	Years of Depreciation
5.0	15

Item Description	Item Cost	Date Required	Final Date	Yrs	Interest Saved	Costs Saved	EB Amount
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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	31-Jan-2020	0.20	\$15	n/a	\$15
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

Estimated cost to begin maintaining the records for the SO2 emissions data and fuel sampling data for the fuel oil used as raw material. The Date Required is the investigation date 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	\$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

\$15

Screening Date 22-Sep-2020 Respondent SI Group, Inc. Case ID No. 59891 Reg. Ent. Reference No. RN100218999 Media Air Enf. Coordinator Danielle Porras	Docket No. 2020-1255-AIR-E	PCW <i>Policy Revision 4 (April 2014)</i> <i>PCW Revision March 26, 2014</i>														
Violation Number 20																
Rule Cite(s) 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)																
Violation Description 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.																
Base Penalty		\$25,000														
>> Environmental, Property and Human Health Matrix																
OR	Release	Harm														
		Major Moderate Minor														
	Actual Potential	<table border="1" style="width: 100%; border-collapse: collapse;"> <tr><td style="width: 33%; height: 15px;"></td><td style="width: 33%; height: 15px;"></td><td style="width: 33%; height: 15px;"></td></tr> <tr><td style="height: 15px;"></td><td style="height: 15px;"></td><td style="height: 15px;"></td></tr> </table>							Percent 0.0%							
>> Programmatic Matrix																
	Falsification	Major Moderate Minor														
	<table border="1" style="width: 100%; border-collapse: collapse;"> <tr><td style="width: 33%; height: 15px;"></td><td style="width: 33%; height: 15px; text-align: center;">x</td><td style="width: 33%; height: 15px;"></td></tr> </table>		x		Percent 15.0%											
	x															
Matrix Notes	100% of the rule requirements were not met.															
Adjustment		\$21,250														
		\$3,750														
Violation Events																
Number of Violation Events 1		224 Number of violation days														
	<table border="1" style="width: 100%; border-collapse: collapse;"> <tr><td style="width: 30px;">daily</td><td style="width: 100px; height: 15px;"></td></tr> <tr><td>weekly</td><td style="height: 15px;"></td></tr> <tr><td>monthly</td><td style="height: 15px;"></td></tr> <tr><td>quarterly</td><td style="height: 15px;"></td></tr> <tr><td>semiannual</td><td style="height: 15px;"></td></tr> <tr><td>annual</td><td style="height: 15px;"></td></tr> <tr><td>single event</td><td style="text-align: center;">x</td></tr> </table>	daily		weekly		monthly		quarterly		semiannual		annual		single event	x	Violation Base Penalty \$3,750
daily																
weekly																
monthly																
quarterly																
semiannual																
annual																
single event	x															
One single event is recommended for the missing record.																
Good Faith Efforts to Comply		Reduction \$937														
Before NOE/NOV NOE/NOV to EDPRP/Settlement Offer																
Extraordinary																
Ordinary	x															
N/A																
Notes	The Respondent completed the corrective measure by June 30, 2020, prior to the NOE dated August 28, 2020.															
Violation Subtotal		\$2,813														
Economic Benefit (EB) for this violation																
Estimated EB Amount		\$46														
Statutory Limit Test																
Violation Final Penalty Total		\$6,188														
This violation Final Assessed Penalty (adjusted for limits)		\$6,188														

Economic Benefit Worksheet

Respondent SI Group, Inc.
Case ID No. 59891
Reg. Ent. Reference No. RN100218999
Media Air
Violation No. 20

Percent Interest	Years of Depreciation
5.0	15

Item Description	Item Cost	Date Required	Final Date	Yrs	Interest Saved	Costs Saved	EB Amount
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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

Estimated cost to implement 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. The Date Required is the investigation date 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	\$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

Screening Date 22-Sep-2020 Respondent SI Group, Inc. Case ID No. 59891 Reg. Ent. Reference No. RN100218999 Media Air Enf. Coordinator Danielle Porras	Docket No. 2020-1255-AIR-E	PCW <i>Policy Revision 4 (April 2014)</i> <i>PCW Revision March 26, 2014</i>
Violation Number 21		
Rule Cite(s) 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)		
Violation Description 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.		
Base Penalty		\$25,000
>> Environmental, Property and Human Health Matrix		
OR	Release Actual Potential	Harm Major Moderate Minor
Percent		0.0%
>> Programmatic Matrix		
	Falsification Major Moderate Minor	
		x
Percent		1.0%
Matrix Notes	Less than 30% of the rule requirements were met.	
Adjustment		\$24,750
		\$250
Violation Events		
Number of Violation Events 1		Number of violation days 597
<div style="border: 1px solid black; padding: 2px;"> daily weekly monthly quarterly semiannual annual single event </div>	<div style="border: 1px solid black; padding: 2px;"> <div style="border: 1px solid black; width: 50px; height: 20px;"></div> <div style="border: 1px solid black; width: 50px; height: 20px;"></div> <div style="border: 1px solid black; width: 50px; height: 20px;"></div> <div style="border: 1px solid black; width: 50px; height: 20px;"></div> <div style="border: 1px solid black; width: 50px; height: 20px;"></div> <div style="border: 1px solid black; width: 50px; height: 20px;"></div> <div style="border: 1px solid black; width: 50px; height: 20px; text-align: center;">x</div> </div>	
Violation Base Penalty		\$250
One single event is recommended for the incomplete record.		
Good Faith Efforts to Comply		
25.0%		Reduction \$62
Before NOE/NOV NOE/NOV to EDPRP/Settlement Offer		
Extraordinary Ordinary N/A	<div style="border: 1px solid black; padding: 2px;"> <div style="border: 1px solid black; width: 50px; height: 20px;"></div> <div style="border: 1px solid black; width: 50px; height: 20px; text-align: center;">x</div> <div style="border: 1px solid black; width: 50px; height: 20px;"></div> </div>	
Notes	The Respondent completed the corrective measures on July 1, 2020, prior to the NOE dated August 28, 2020.	
Violation Subtotal		\$188
Economic Benefit (EB) for this violation		
Statutory Limit Test		
Estimated EB Amount	\$123	Violation Final Penalty Total \$413
This violation Final Assessed Penalty (adjusted for limits)		\$413

Economic Benefit Worksheet

Respondent SI Group, Inc.
Case ID No. 59891
Reg. Ent. Reference No. RN100218999
Media Air
Violation No. 21

Percent Interest	Years of Depreciation
5.0	15

Item Description	Item Cost	Date Required	Final Date	Yrs	Interest Saved	Costs Saved	EB Amount
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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
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 flared gas and begin maintaining records demonstrating that the net heating values for the flared gas are 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	\$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

\$123

Screening Date 22-Sep-2020 Respondent SI Group, Inc. Case ID No. 59891 Reg. Ent. Reference No. RN100218999 Media Air Enf. Coordinator Danielle Porras	Docket No. 2020-1255-AIR-E	PCW <i>Policy Revision 4 (April 2014)</i> <i>PCW Revision March 26, 2014</i>																					
Violation Number <input style="width: 50px;" type="text" value="22"/>																							
Rule Cite(s) 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. O1431, GTC and STC No. 11, and Tex. Health & Safety Code § 382.085(b)																							
Violation Description 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.																							
Base Penalty		<input style="width: 100px;" type="text" value="\$25,000"/>																					
>> Environmental, Property and Human Health Matrix																							
OR	<table border="1" style="margin: auto;"> <tr> <td></td> <th colspan="3">Harm</th> </tr> <tr> <td>Release</td> <td>Major</td> <td>Moderate</td> <td>Minor</td> </tr> <tr> <td>Actual</td> <td><input style="width: 50px;" type="text"/></td> <td><input style="width: 50px;" type="text"/></td> <td><input style="width: 50px;" type="text"/></td> </tr> <tr> <td>Potential</td> <td><input style="width: 50px;" type="text"/></td> <td><input style="width: 50px;" type="text"/></td> <td><input style="width: 50px;" type="text"/></td> </tr> </table>		Harm			Release	Major	Moderate	Minor	Actual	<input style="width: 50px;" type="text"/>	<input style="width: 50px;" type="text"/>	<input style="width: 50px;" type="text"/>	Potential	<input style="width: 50px;" type="text"/>	<input style="width: 50px;" type="text"/>	<input style="width: 50px;" type="text"/>	Percent <input style="width: 50px;" type="text" value="0.0%"/>					
		Harm																					
	Release	Major	Moderate	Minor																			
Actual	<input style="width: 50px;" type="text"/>	<input style="width: 50px;" type="text"/>	<input style="width: 50px;" type="text"/>																				
Potential	<input style="width: 50px;" type="text"/>	<input style="width: 50px;" type="text"/>	<input style="width: 50px;" type="text"/>																				
>> Programmatic Matrix																							
	<table border="1" style="margin: auto;"> <tr> <td></td> <td>Falsification</td> <td>Major</td> <td>Moderate</td> <td>Minor</td> </tr> <tr> <td></td> <td><input style="width: 50px;" type="text"/></td> <td><input style="width: 50px;" type="text"/></td> <td><input style="width: 50px;" type="text"/></td> <td><input style="width: 50px;" type="text" value="x"/></td> </tr> </table>		Falsification	Major	Moderate	Minor		<input style="width: 50px;" type="text"/>	<input style="width: 50px;" type="text"/>	<input style="width: 50px;" type="text"/>	<input style="width: 50px;" type="text" value="x"/>	Percent <input style="width: 50px;" type="text" value="1.0%"/>											
	Falsification	Major	Moderate	Minor																			
	<input style="width: 50px;" type="text"/>	<input style="width: 50px;" type="text"/>	<input style="width: 50px;" type="text"/>	<input style="width: 50px;" type="text" value="x"/>																			
Matrix Notes	Less than 30% of the rule requirements were met.																						
Adjustment		<input style="width: 100px;" type="text" value="\$24,750"/>																					
		<input style="width: 100px;" type="text" value="\$250"/>																					
Violation Events																							
Number of Violation Events <input style="width: 50px;" type="text" value="1"/>		<input style="width: 50px;" type="text" value="597"/> Number of violation days																					
	<table border="1" style="margin: auto;"> <tr> <td></td> <td>daily</td> <td><input style="width: 50px;" type="text"/></td> </tr> <tr> <td></td> <td>weekly</td> <td><input style="width: 50px;" type="text"/></td> </tr> <tr> <td></td> <td>monthly</td> <td><input style="width: 50px;" type="text"/></td> </tr> <tr> <td></td> <td>quarterly</td> <td><input style="width: 50px;" type="text"/></td> </tr> <tr> <td></td> <td>semiannual</td> <td><input style="width: 50px;" type="text"/></td> </tr> <tr> <td></td> <td>annual</td> <td><input style="width: 50px;" type="text"/></td> </tr> <tr> <td></td> <td>single event</td> <td><input style="width: 50px;" type="text" value="x"/></td> </tr> </table>		daily	<input style="width: 50px;" type="text"/>		weekly	<input style="width: 50px;" type="text"/>		monthly	<input style="width: 50px;" type="text"/>		quarterly	<input style="width: 50px;" type="text"/>		semiannual	<input style="width: 50px;" type="text"/>		annual	<input style="width: 50px;" type="text"/>		single event	<input style="width: 50px;" type="text" value="x"/>	Violation Base Penalty <input style="width: 100px;" type="text" value="\$250"/>
	daily	<input style="width: 50px;" type="text"/>																					
	weekly	<input style="width: 50px;" type="text"/>																					
	monthly	<input style="width: 50px;" type="text"/>																					
	quarterly	<input style="width: 50px;" type="text"/>																					
	semiannual	<input style="width: 50px;" type="text"/>																					
	annual	<input style="width: 50px;" type="text"/>																					
	single event	<input style="width: 50px;" type="text" value="x"/>																					
One single event is recommended for the incomplete record.																							
Good Faith Efforts to Comply																							
<input style="width: 50px;" type="text" value="25.0%"/>		Reduction <input style="width: 100px;" type="text" value="\$62"/>																					
Before NOE/NOV NOE/NOV to EDPRP/Settlement Offer																							
Extraordinary	<input style="width: 100px;" type="text"/>	<input style="width: 100px;" type="text"/>																					
Ordinary	<input style="width: 100px;" type="text" value="x"/>	<input style="width: 100px;" type="text"/>																					
N/A	<input style="width: 100px;" type="text"/>	<input style="width: 100px;" type="text"/>																					
Notes	The Respondent completed the corrective measures on July 1, 2020, prior to the NOE dated August 28, 2020.																						
Violation Subtotal		<input style="width: 100px;" type="text" value="\$188"/>																					
Economic Benefit (EB) for this violation																							
Statutory Limit Test																							
Estimated EB Amount	<input style="width: 100px;" type="text" value="\$123"/>	Violation Final Penalty Total <input style="width: 100px;" type="text" value="\$413"/>																					
This violation Final Assessed Penalty (adjusted for limits)		<input style="width: 100px;" type="text" value="\$413"/>																					

Economic Benefit Worksheet

Respondent SI Group, Inc.
Case ID No. 59891
Reg. Ent. Reference No. RN100218999
Media Air
Violation No. 22

Percent Interest	Years of Depreciation
5.0	15

Item Description	Item Cost	Date Required	Final Date	Yrs	Interest Saved	Costs Saved	EB Amount
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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
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)

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

\$123

Screening Date 22-Sep-2020 Respondent SI Group, Inc. Case ID No. 59891 Reg. Ent. Reference No. RN100218999 Media Air Enf. Coordinator Danielle Porras	Docket No. 2020-1255-AIR-E	PCW <i>Policy Revision 4 (April 2014)</i> <i>PCW Revision March 26, 2014</i>			
Violation Number 23					
Rule Cite(s) 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)					
Violation Description 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.					
Base Penalty		\$25,000			
>> Environmental, Property and Human Health Matrix					
OR	Release Actual Potential	Harm Major Moderate Minor <div style="display: flex; justify-content: space-around;"> <div style="border: 1px solid black; width: 40px; height: 20px;"></div> <div style="border: 1px solid black; width: 40px; height: 20px;"></div> <div style="border: 1px solid black; width: 40px; height: 20px;"></div> </div>	Percent 0.0%		
>> Programmatic Matrix					
	Falsification <div style="border: 1px solid black; width: 40px; height: 20px;"></div>	Major <div style="border: 1px solid black; width: 40px; height: 20px; text-align: center;">x</div>	Moderate <div style="border: 1px solid black; width: 40px; height: 20px;"></div>	Minor <div style="border: 1px solid black; width: 40px; height: 20px;"></div>	Percent 15.0%
Matrix Notes	100% of the rule requirements are not met.				
Adjustment		\$21,250			
		\$3,750			
Violation Events					
Number of Violation Events		1	244	Number of violation days	
	daily weekly monthly quarterly semiannual annual single event	<div style="border: 1px solid black; width: 40px; height: 20px;"></div> <div style="border: 1px solid black; width: 40px; height: 20px;"></div> <div style="border: 1px solid black; width: 40px; height: 20px;"></div> <div style="border: 1px solid black; width: 40px; height: 20px;"></div> <div style="border: 1px solid black; width: 40px; height: 20px;"></div> <div style="border: 1px solid black; width: 40px; height: 20px; text-align: center;">x</div>			Violation Base Penalty \$3,750
One single event is recommended for the missing record.					
Good Faith Efforts to Comply		25.0%		Reduction \$937	
		Before NOE/NOV NOE/NOV to EDPRP/Settlement Offer			
Extraordinary					
Ordinary		x			
N/A					
Notes		The Respondent completed the corrective measures on July 20, 2020, prior to the NOE dated August 28, 2020.			
Violation Subtotal		\$2,813			
Economic Benefit (EB) for this violation			Statutory Limit Test		
Estimated EB Amount		\$50		Violation Final Penalty Total	
				\$6,188	
This violation Final Assessed Penalty (adjusted for limits)				\$6,188	

Economic Benefit Worksheet

Respondent SI Group, Inc.
Case ID No. 59891
Reg. Ent. Reference No. RN100218999
Media Air
Violation No. 23

Percent Interest	Years of Depreciation
5.0	15

Item Description	Item Cost	Date Required	Final Date	Yrs	Interest Saved	Costs Saved	EB Amount
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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	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	Estimated cost to begin maintaining the records for the maintenance conducted on each stationary RICE. The Date Required is the investigation date 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	\$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 \$50

Screening Date 22-Sep-2020 Respondent SI Group, Inc. Case ID No. 59891 Reg. Ent. Reference No. RN100218999 Media Air Enf. Coordinator Danielle Porras	Docket No. 2020-1255-AIR-E	PCW <i>Policy Revision 4 (April 2014)</i> <i>PCW Revision March 26, 2014</i>	
Violation Number 24			
Rule Cite(s) 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)			
Violation Description 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.			
Base Penalty		\$25,000	
>> Environmental, Property and Human Health Matrix			
OR	Release Actual Potential	Harm Major Moderate Minor <div style="display: flex; justify-content: space-around;"> <div style="border: 1px solid black; width: 40px; height: 20px;"></div> <div style="border: 1px solid black; width: 40px; height: 20px;"></div> <div style="border: 1px solid black; width: 40px; height: 20px;"></div> </div>	Percent 0.0%
>> Programmatic Matrix			
	Falsification Major Moderate Minor <div style="display: flex; justify-content: space-around;"> <div style="border: 1px solid black; width: 40px; height: 20px;"></div> <div style="border: 1px solid black; width: 40px; height: 20px; text-align: center;">x</div> <div style="border: 1px solid black; width: 40px; height: 20px;"></div> <div style="border: 1px solid black; width: 40px; height: 20px;"></div> </div>	Percent 15.0%	
Matrix Notes	100% of the rule requirements were not met.		
Adjustment		\$21,250	
		\$3,750	
Violation Events			
Number of Violation Events 1		Number of violation days 224	
	<div style="border: 1px solid black; padding: 2px;"> daily weekly monthly quarterly semiannual annual single event </div>	<div style="border: 1px solid black; padding: 2px;"> <div style="border: 1px solid black; height: 20px; margin-bottom: 2px;"></div> <div style="border: 1px solid black; height: 20px; margin-bottom: 2px;"></div> <div style="border: 1px solid black; height: 20px; margin-bottom: 2px;"></div> <div style="border: 1px solid black; height: 20px; margin-bottom: 2px;"></div> <div style="border: 1px solid black; height: 20px; margin-bottom: 2px;"></div> <div style="border: 1px solid black; height: 20px; margin-bottom: 2px;"></div> <div style="border: 1px solid black; height: 20px; text-align: center;">x</div> </div>	
		Violation Base Penalty \$3,750	
One single event is recommended for the missing record.			
Good Faith Efforts to Comply			
25.0%		Reduction \$937	
	Before NOE/NOV NOE/NOV to EDPRP/Settlement Offer		
Extraordinary			
Ordinary	x		
N/A			
Notes	The Respondent completed the corrective measure on June 30, 2020, prior to the NOE dated August 28, 2020.		
Violation Subtotal		\$2,813	
Economic Benefit (EB) for this violation			
Statutory Limit Test			
Estimated EB Amount	\$46	Violation Final Penalty Total \$6,188	
This violation Final Assessed Penalty (adjusted for limits)		\$6,188	

Economic Benefit Worksheet

Respondent SI Group, Inc.
Case ID No. 59891
Reg. Ent. Reference No. RN100218999
Media Air
Violation No. 24

Percent Interest	Years of Depreciation
5.0	15

Item Description	Item Cost	Date Required	Final Date	Yrs	Interest Saved	Costs Saved	EB Amount
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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

Estimated cost to implement procedures for the records needed for each stationary RICE and begin maintaining records for the hours of operation of each stationary RICE that is recorded through the non-resettable hour meter. The Date Required is the investigation date 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	\$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

Screening Date 22-Sep-2020 Respondent SI Group, Inc. Case ID No. 59891 Reg. Ent. Reference No. RN100218999 Media Air Enf. Coordinator Danielle Porras	Docket No. 2020-1255-AIR-E	PCW <i>Policy Revision 4 (April 2014)</i> <i>PCW Revision March 26, 2014</i>	
Violation Number 25			
Rule Cite(s) 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)			
Violation Description 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.			
Base Penalty		\$25,000	
>> Environmental, Property and Human Health Matrix			
OR	Release	Harm	
		Major Moderate Minor	
	Actual Potential	<div style="border-bottom: 1px solid black; height: 15px; width: 100%;"></div> <div style="border-bottom: 1px solid black; height: 15px; width: 100%;"></div>	<div style="border-bottom: 1px solid black; height: 15px; width: 100%;"></div> <div style="border-bottom: 1px solid black; height: 15px; width: 100%;"></div>
		Percent	0.0%
>> Programmatic Matrix			
	Falsification	Major Moderate Minor	
	<div style="border-bottom: 1px solid black; height: 15px; width: 100%;"></div>	<div style="border-bottom: 1px solid black; height: 15px; width: 100%;"></div> <div style="border-bottom: 1px solid black; height: 15px; width: 100%;"></div> <div style="border-bottom: 1px solid black; height: 15px; width: 100%; text-align: center;">x</div>	<div style="border-bottom: 1px solid black; height: 15px; width: 100%;"></div>
Percent		1.0%	
Matrix Notes	Less than 30% of the rule requirements were met.		
Adjustment		\$24,750	
		\$250	
Violation Events			
Number of Violation Events		1	Number of violation days
		440	
	daily weekly monthly quarterly semiannual annual single event	<div style="border-bottom: 1px solid black; height: 15px; width: 100%;"></div> <div style="border-bottom: 1px solid black; height: 15px; width: 100%;"></div> <div style="border-bottom: 1px solid black; height: 15px; width: 100%;"></div> <div style="border-bottom: 1px solid black; height: 15px; width: 100%;"></div> <div style="border-bottom: 1px solid black; height: 15px; width: 100%;"></div> <div style="border-bottom: 1px solid black; height: 15px; width: 100%; text-align: center;">x</div>	
Violation Base Penalty		\$250	
One single event is recommended for the incomplete record.			
Good Faith Efforts to Comply		25.0%	Reduction
		\$62	
Before NOE/NOV NOE/NOV to EDPRP/Settlement Offer			
	Extraordinary	<div style="border-bottom: 1px solid black; height: 15px; width: 100%;"></div>	
	Ordinary	<div style="border-bottom: 1px solid black; height: 15px; width: 100%; text-align: center;">x</div>	
	N/A	<div style="border-bottom: 1px solid black; height: 15px; width: 100%;"></div>	
	Notes	The Respondent completed the corrective measure on March 10, 2020, prior to the NOE dated August 28, 2020.	
Violation Subtotal		\$188	
Economic Benefit (EB) for this violation		Statutory Limit Test	
Estimated EB Amount		\$90	Violation Final Penalty Total
		\$413	
This violation Final Assessed Penalty (adjusted for limits)		\$413	

Economic Benefit Worksheet

Respondent SI Group, Inc.
Case ID No. 59891
Reg. Ent. Reference No. RN100218999
Media Air
Violation No. 25

Percent Interest	Years of Depreciation
5.0	15

Item Description	Item Cost	Date Required	Final Date	Yrs	Interest Saved	Costs Saved	EB Amount
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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	10-Mar-2020	1.21	\$90	n/a	\$90
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

Estimated cost to implement 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. The Date Required is the effective date of the special condition 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	\$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

Screening Date 22-Sep-2020 Respondent SI Group, Inc. Case ID No. 59891 Reg. Ent. Reference No. RN100218999 Media Air Enf. Coordinator Danielle Porras	Docket No. 2020-1255-AIR-E	PCW <i>Policy Revision 4 (April 2014)</i> <i>PCW Revision March 26, 2014</i>
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Violation Number	26	
Rule Cite(s)	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)	
Violation Description	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.	

Base Penalty	\$25,000
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>> Environmental, Property and Human Health Matrix

OR		Harm			
	Release	Major	Moderate	Minor	
	Actual	<input type="text"/>	<input type="text"/>	<input type="text"/>	Percent <input style="width: 50px;" type="text" value="0.0%"/>
	Potential	<input type="text"/>	<input type="text"/>	<input type="text"/>	

>> Programmatic Matrix

	Falsification	Major	Moderate	Minor	
	<input type="text"/>	<input type="text"/>	<input type="text"/>	x	Percent <input style="width: 50px;" type="text" value="1.0%"/>

Matrix Notes	Less than 30% of the rule requirements were met.
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Adjustment	\$24,750
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	\$250
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Violation Events

Number of Violation Events	1	597	Number of violation days
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	daily	<input type="text"/>	Violation Base Penalty <input style="width: 100px;" type="text" value="\$250"/>
	weekly	<input type="text"/>	
	monthly	<input type="text"/>	
	quarterly	<input type="text"/>	
	semiannual	<input type="text"/>	
	annual	<input type="text"/>	
	single event	x	

One single event is recommended.

Good Faith Efforts to Comply

25.0%	Reduction <input style="width: 100px;" type="text" value="\$62"/>
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		Before NOE/NOV	NOE/NOV to EDPRP/Settlement Offer	
Extraordinary	<input type="text"/>	<input type="text"/>	<input type="text"/>	
Ordinary	x	<input type="text"/>	<input type="text"/>	
N/A	<input type="text"/>	<input type="text"/>	<input type="text"/>	

Notes	The Respondent completed the corrective measures by July 1, 2020, prior to the NOE dated August 28, 2020.
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Violation Subtotal	\$188
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Economic Benefit (EB) for this violation

Estimated EB Amount	\$123
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Statutory Limit Test

Violation Final Penalty Total	\$413
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This violation Final Assessed Penalty (adjusted for limits)	\$413
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Economic Benefit Worksheet

Respondent SI Group, Inc.
Case ID No. 59891
Reg. Ent. Reference No. RN100218999
Media Air
Violation No. 26

Percent Interest	Years of Depreciation
5.0	15

Item Description	Item Cost	Date Required	Final Date	Yrs	Interest Saved	Costs Saved	EB Amount
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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
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 design documentation for establishing the flow rate for the Water Scrubber F-700 and begin 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. 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	\$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

\$123

Screening Date 22-Sep-2020 Respondent SI Group, Inc. Case ID No. 59891 Reg. Ent. Reference No. RN100218999 Media Air Enf. Coordinator Danielle Porras	Docket No. 2020-1255-AIR-E	PCW <i>Policy Revision 4 (April 2014)</i> <i>PCW Revision March 26, 2014</i>																
Violation Number 27																		
Rule Cite(s) 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)																		
Violation Description 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.																		
Base Penalty		\$25,000																
>> Environmental, Property and Human Health Matrix																		
OR	<table border="1" style="margin: auto;"> <tr> <td></td> <th colspan="3">Harm</th> </tr> <tr> <th>Release</th> <th>Major</th> <th>Moderate</th> <th>Minor</th> </tr> <tr> <td>Actual</td> <td style="border: 1px solid black;"></td> <td style="border: 1px solid black;"></td> <td style="border: 1px solid black;"></td> </tr> <tr> <td>Potential</td> <td style="border: 1px solid black;"></td> <td style="border: 1px solid black;"></td> <td style="border: 1px solid black;"></td> </tr> </table>		Harm			Release	Major	Moderate	Minor	Actual				Potential				Percent 0.0%
		Harm																
	Release	Major	Moderate	Minor														
Actual																		
Potential																		
>> Programmatic Matrix																		
Matrix Notes	<table border="1" style="margin: auto;"> <tr> <td></td> <th>Falsification</th> <th>Major</th> <th>Moderate</th> <th>Minor</th> </tr> <tr> <td></td> <td style="border: 1px solid black;"></td> <td style="border: 1px solid black;"></td> <td style="border: 1px solid black;"></td> <td style="border: 1px solid black; text-align: center;">x</td> </tr> </table>		Falsification	Major	Moderate	Minor					x	Percent 1.0%						
		Falsification	Major	Moderate	Minor													
					x													
Less than 30% of the rule requirements were met.																		
Adjustment		\$24,750																
		\$250																
Violation Events																		
Number of Violation Events 1		308 Number of violation days																
<table border="1" style="margin: auto;"> <tr><td>daily</td><td style="border: 1px solid black;"></td></tr> <tr><td>weekly</td><td style="border: 1px solid black;"></td></tr> <tr><td>monthly</td><td style="border: 1px solid black;"></td></tr> <tr><td>quarterly</td><td style="border: 1px solid black;"></td></tr> <tr><td>semiannual</td><td style="border: 1px solid black;"></td></tr> <tr><td>annual</td><td style="border: 1px solid black;"></td></tr> <tr><td>single event</td><td style="border: 1px solid black; text-align: center;">x</td></tr> </table>		daily		weekly		monthly		quarterly		semiannual		annual		single event	x	Violation Base Penalty \$250		
daily																		
weekly																		
monthly																		
quarterly																		
semiannual																		
annual																		
single event	x																	
One single event is recommended for the incomplete record.																		
Good Faith Efforts to Comply		Reduction \$62																
<div style="display: flex; justify-content: space-between;"> Before NOE/NOV NOE/NOV to EDRP/Settlement Offer </div> <table border="1" style="margin: auto;"> <tr> <td>Extraordinary</td> <td style="border: 1px solid black;"></td> </tr> <tr> <td>Ordinary</td> <td style="border: 1px solid black; text-align: center;">x</td> </tr> <tr> <td>N/A</td> <td style="border: 1px solid black;"></td> </tr> </table>			Extraordinary		Ordinary	x	N/A											
Extraordinary																		
Ordinary	x																	
N/A																		
Notes The Respondent completed the corrective measures on October 30, 2019, prior to the NOE dated August 28, 2020.																		
Violation Subtotal		\$188																
Economic Benefit (EB) for this violation																		
Statutory Limit Test																		
Estimated EB Amount \$63		Violation Final Penalty Total \$413																
This violation Final Assessed Penalty (adjusted for limits)		\$413																

Economic Benefit Worksheet

Respondent SI Group, Inc.
Case ID No. 59891
Reg. Ent. Reference No. RN100218999
Media Air
Violation No. 27

Percent Interest	Years of Depreciation
5.0	15

Item Description	Item Cost	Date Required	Final Date	Yrs	Interest Saved	Costs Saved	EB Amount
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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

Notes for DELAYED costs

Estimated cost to begin maintaining records in the process control data historian demonstrating that the gas fuel usage for each combustion device is recorded monthly. The Date Required is the effective date of the special condition 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	\$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

\$63

Screening Date 22-Sep-2020 Respondent SI Group, Inc. Case ID No. 59891 Reg. Ent. Reference No. RN100218999 Media Air Enf. Coordinator Danielle Porras	Docket No. 2020-1255-AIR-E	PCW <i>Policy Revision 4 (April 2014)</i> <i>PCW Revision March 26, 2014</i>
Violation Number 28		
Rule Cite(s) 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)		
Violation Description 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.		
Base Penalty		\$25,000
>> Environmental, Property and Human Health Matrix		
OR	Release	Harm
	Major	Moderate
	Minor	Minor
Actual		
Potential		
Percent		0.0%
>> Programmatic Matrix		
	Falsification	Major
	Moderate	Minor
		x
Percent		1.0%
Matrix Notes	Less than 30% of the rule requirements were met.	
Adjustment		\$24,750
		\$250
Violation Events		
Number of Violation Events		1
		572
		Number of violation days
<div style="border: 1px solid black; padding: 2px; margin-bottom: 2px;">daily</div> <div style="border: 1px solid black; padding: 2px; margin-bottom: 2px;">weekly</div> <div style="border: 1px solid black; padding: 2px; margin-bottom: 2px;">monthly</div> <div style="border: 1px solid black; padding: 2px; margin-bottom: 2px;">quarterly</div> <div style="border: 1px solid black; padding: 2px; margin-bottom: 2px;">semiannual</div> <div style="border: 1px solid black; padding: 2px; margin-bottom: 2px;">annual</div> <div style="border: 1px solid black; padding: 2px;">single event</div>	<div style="border: 1px solid black; width: 50px; height: 15px; margin-bottom: 2px;"></div> <div style="border: 1px solid black; width: 50px; height: 15px; margin-bottom: 2px;"></div> <div style="border: 1px solid black; width: 50px; height: 15px; margin-bottom: 2px;"></div> <div style="border: 1px solid black; width: 50px; height: 15px; margin-bottom: 2px;"></div> <div style="border: 1px solid black; width: 50px; height: 15px; margin-bottom: 2px;"></div> <div style="border: 1px solid black; width: 50px; height: 15px; margin-bottom: 2px;"></div> <div style="border: 1px solid black; width: 50px; height: 15px; text-align: center;">x</div>	
Violation Base Penalty		\$250
One single event is recommended for the incomplete record.		
Good Faith Efforts to Comply		
25.0%		Reduction
		\$62
Before NOE/NOV NOE/NOV to EDPRP/Settlement Offer		
Extraordinary		
Ordinary	x	
N/A		
Notes	The Respondent completed the corrective measures on July 20, 2020, prior to the NOE dated August 28, 2020.	
Violation Subtotal		\$188
Economic Benefit (EB) for this violation		
Statutory Limit Test		
Estimated EB Amount	\$118	Violation Final Penalty Total
		\$413
This violation Final Assessed Penalty (adjusted for limits)		\$413

Economic Benefit Worksheet

Respondent SI Group, Inc.
Case ID No. 59891
Reg. Ent. Reference No. RN100218999
Media Air
Violation No. 28

Percent Interest	Years of Depreciation
5.0	15

Item Description	Item Cost	Date Required	Final Date	Yrs	Interest Saved	Costs Saved	EB Amount
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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	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

Estimated cost to begin maintaining records demonstrating that each diesel engine manufacturer's design and operation specifications and all emission-related maintenance requirements are maintained at the Plant. The Date Required is the effective date of the special condition 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	\$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

Screening Date 22-Sep-2020 Respondent SI Group, Inc. Case ID No. 59891 Reg. Ent. Reference No. RN100218999 Media Air Enf. Coordinator Danielle Porras	Docket No. 2020-1255-AIR-E	PCW <i>Policy Revision 4 (April 2014)</i> <i>PCW Revision March 26, 2014</i>
Violation Number 29		
Rule Cite(s) 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. O1431, GTC and STC No. 11, and Tex. Health & Safety Code § 382.085(b)		
Violation Description 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.		
Base Penalty		\$25,000
>> Environmental, Property and Human Health Matrix		
OR	Release Harm Major Moderate Minor Actual Potential 	Percent 0.0%
	>> Programmatic Matrix	
	Falsification Major Moderate Minor x	Percent 1.0%
Matrix Notes	Less than 30% of the rule requirements were met.	
Adjustment		\$24,750
		\$250
Violation Events		
Number of Violation Events 1		1404 Number of violation days
	<div style="border: 1px solid black; padding: 2px;"> <div style="display: flex; justify-content: space-between; padding: 2px;"> daily </div> <div style="display: flex; justify-content: space-between; padding: 2px;"> weekly </div> <div style="display: flex; justify-content: space-between; padding: 2px;"> monthly </div> <div style="display: flex; justify-content: space-between; padding: 2px;"> quarterly </div> <div style="display: flex; justify-content: space-between; padding: 2px;"> semiannual </div> <div style="display: flex; justify-content: space-between; padding: 2px;"> annual </div> <div style="display: flex; justify-content: space-between; padding: 2px;"> single event x </div> </div>	Violation Base Penalty \$250
One single event is recommended for the incomplete record.		
Good Faith Efforts to Comply		25.0% Reduction \$62
Before NOE/NOV NOE/NOV to EDPRP/Settlement Offer		
Extraordinary Ordinary x N/A 		
Notes The Respondent completed the corrective measures on January 31, 2020, prior to the NOE dated August 28, 2020.		
Violation Subtotal		\$188
Economic Benefit (EB) for this violation		
Statutory Limit Test		
Estimated EB Amount \$288		Violation Final Penalty Total \$413
		This violation Final Assessed Penalty (adjusted for limits) \$413

Economic Benefit Worksheet

Respondent SI Group, Inc.
Case ID No. 59891
Reg. Ent. Reference No. RN100218999
Media Air
Violation No. 29

Percent Interest	Years of Depreciation
5.0	15

Item Description	Item Cost	Date Required	Final Date	Yrs	Interest Saved	Costs Saved	EB Amount
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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				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

Estimated cost to cease operating the CAS. The Dates Required is the first date of non-compliance 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	\$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

Screening Date 22-Sep-2020 Respondent SI Group, Inc. Case ID No. 59891 Reg. Ent. Reference No. RN100218999 Media Air Enf. Coordinator Danielle Porras	Docket No. 2020-1255-AIR-E	PCW <i>Policy Revision 4 (April 2014)</i> <i>PCW Revision March 26, 2014</i>				
Violation Number 30						
Rule Cite(s) 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. O1431, GTC and STC No. 11, and Tex. Health & Safety Code § 382.085(b)						
Violation Description 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.						
Base Penalty		\$25,000				
>> Environmental, Property and Human Health Matrix						
OR	Release	Harm				
		Major Moderate Minor				
	Actual Potential	 	 	 	 	Percent 0.0%
>> Programmatic Matrix						
	Falsification	Major	Moderate	Minor		
				x	Percent 1.0%	
Matrix Notes	Less than 30% of the rule requirements were met.					
Adjustment					\$24,750	
					\$250	
Violation Events						
Number of Violation Events		1	596 Number of violation days			
	daily					
	weekly					
	monthly					
	quarterly					
	semiannual					
	annual					
	single event	x				
One single event is recommended for the incomplete record.						
Good Faith Efforts to Comply		25.0%	Reduction		\$62	
		Before NOE/NOV NOE/NOV to EDPRP/Settlement Offer				
	Extraordinary					
	Ordinary	x				
	N/A					
	Notes	The Respondent completed the corrective measures on June 30, 2020, prior to the NOE dated August 28, 2020.				
Violation Subtotal					\$188	
Economic Benefit (EB) for this violation			Statutory Limit Test			
Estimated EB Amount		\$46	Violation Final Penalty Total		\$413	
This violation Final Assessed Penalty (adjusted for limits)					\$413	

Economic Benefit Worksheet

Respondent SI Group, Inc.
Case ID No. 59891
Reg. Ent. Reference No. RN100218999
Media Air
Violation No. 30

Percent Interest	Years of Depreciation
5.0	15

Item Description	Item Cost	Date Required	Final Date	Yrs	Interest Saved	Costs Saved	EB Amount
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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

Estimated cost to implement procedures for the records needed for the AOV checks for VOC leaks and begin 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. The Date Required is the investigation date 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	\$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

Screening Date 22-Sep-2020 Respondent SI Group, Inc. Case ID No. 59891 Reg. Ent. Reference No. RN100218999 Media Air Enf. Coordinator Danielle Porras	Docket No. 2020-1255-AIR-E	PCW <i>Policy Revision 4 (April 2014)</i> <i>PCW Revision March 26, 2014</i>
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Violation Number	31	
Rule Cite(s)	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)	
Violation Description	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.	
Base Penalty		\$25,000

>> Environmental, Property and Human Health Matrix

OR		Harm			
	Release	Major	Moderate	Minor	
	Actual				
	Potential				Percent 0.0%

>> Programmatic Matrix

	Falsification	Major	Moderate	Minor	
		x			
					Percent 15.0%

Matrix Notes	100% of the rule requirements were not met.
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Adjustment	\$21,250
\$3,750	

Violation Events

Number of Violation Events	1	224	Number of violation days
	daily		
	weekly		
	monthly		
	quarterly		
	semiannual		
	annual		
	single event	x	
Violation Base Penalty \$3,750			
One single event is recommended for the missing record.			

Good Faith Efforts to Comply

	25.0%	
	Before NOE/NOV	NOE/NOV to EDPRP/Settlement Offer
Extraordinary		
Ordinary	x	
N/A		
Notes	The Respondent completed the corrective measure on June 30, 2020, prior to the NOE dated August 28, 2020.	
Violation Subtotal		\$2,813

Economic Benefit (EB) for this violation	Statutory Limit Test
Estimated EB Amount \$46	Violation Final Penalty Total \$6,188
This violation Final Assessed Penalty (adjusted for limits) \$6,188	

Economic Benefit Worksheet

Respondent SI Group, Inc.
Case ID No. 59891
Reg. Ent. Reference No. RN100218999
Media Air
Violation No. 31

Percent Interest	Years of Depreciation
5.0	15

Item Description	Item Cost	Date Required	Final Date	Yrs	Interest Saved	Costs Saved	EB 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				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

Estimated cost to implement procedures for the records needed for the relief valve monitoring and begin 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. The Date Required is the investigation date 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	\$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

Screening Date 22-Sep-2020 Respondent SI Group, Inc. Case ID No. 59891 Reg. Ent. Reference No. RN100218999 Media Air Enf. Coordinator Danielle Porras	Docket No. 2020-1255-AIR-E	PCW <i>Policy Revision 4 (April 2014)</i> <i>PCW Revision March 26, 2014</i>	
Violation Number 32			
Rule Cite(s) 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)			
Violation Description <div style="border: 1px solid black; padding: 5px; margin-top: 5px;"> 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. </div>			
Base Penalty		\$25,000	
>> Environmental, Property and Human Health Matrix			
OR	Release Actual Potential	Harm Major Moderate Minor <div style="display: flex; justify-content: space-around;"> <div style="border: 1px solid black; width: 40px; height: 20px;"></div> <div style="border: 1px solid black; width: 40px; height: 20px;"></div> <div style="border: 1px solid black; width: 40px; height: 20px;"></div> </div>	Percent 0.0%
>> Programmatic Matrix			
	Falsification Major Moderate Minor <div style="display: flex; justify-content: space-around;"> <div style="border: 1px solid black; width: 40px; height: 20px;"></div> <div style="border: 1px solid black; width: 40px; height: 20px; text-align: center;">x</div> <div style="border: 1px solid black; width: 40px; height: 20px;"></div> <div style="border: 1px solid black; width: 40px; height: 20px;"></div> </div>	Percent 15.0%	
Matrix Notes	100% of the rule requirements were not met.		
Adjustment		\$21,250	
		\$3,750	
Violation Events			
Number of Violation Events 1		224 Number of violation days	
	<div style="border: 1px solid black; padding: 2px;"> daily weekly monthly quarterly semiannual annual single event </div>	<div style="border: 1px solid black; padding: 2px;"> <div style="border: 1px solid black; width: 40px; height: 15px;"></div> <div style="border: 1px solid black; width: 40px; height: 15px;"></div> <div style="border: 1px solid black; width: 40px; height: 15px;"></div> <div style="border: 1px solid black; width: 40px; height: 15px;"></div> <div style="border: 1px solid black; width: 40px; height: 15px;"></div> <div style="border: 1px solid black; width: 40px; height: 15px;"></div> <div style="border: 1px solid black; width: 40px; height: 15px; text-align: center;">x</div> </div>	
		Violation Base Penalty	
		\$3,750	
One single event is recommended for the missing record.			
Good Faith Efforts to Comply		25.0% Reduction \$937	
<div style="display: flex; justify-content: space-between; font-size: small;"> Before NOE/NOV NOE/NOV to EDPRP/Settlement Offer </div> <div style="display: flex; justify-content: space-between;"> <div style="width: 30%;"> Extraordinary Ordinary N/A </div> <div style="width: 60%;"> <div style="border: 1px solid black; padding: 2px; display: flex; justify-content: space-around;"> <div style="border: 1px solid black; width: 40px; height: 15px;"></div> <div style="border: 1px solid black; width: 40px; height: 15px;"></div> </div> <div style="border: 1px solid black; padding: 2px; display: flex; justify-content: space-around;"> <div style="border: 1px solid black; width: 40px; height: 15px; text-align: center;">x</div> <div style="border: 1px solid black; width: 40px; height: 15px;"></div> </div> <div style="border: 1px solid black; padding: 2px; display: flex; justify-content: space-around;"> <div style="border: 1px solid black; width: 40px; height: 15px;"></div> <div style="border: 1px solid black; width: 40px; height: 15px;"></div> </div> </div> </div>			
Notes: The Respondent completed the corrective measures on June 30, 2020, prior to the NOE dated August 28, 2020.			
Violation Subtotal		\$2,813	
Economic Benefit (EB) for this violation			
Statutory Limit Test			
Estimated EB Amount \$46		Violation Final Penalty Total \$6,188	
This violation Final Assessed Penalty (adjusted for limits)		\$6,188	

Economic Benefit Worksheet

Respondent SI Group, Inc.
Case ID No. 59891
Reg. Ent. Reference No. RN100218999
Media Air
Violation No. 32

Percent Interest	Years of Depreciation
5.0	15

Item Description	Item Cost	Date Required	Final Date	Yrs	Interest Saved	Costs Saved	EB Amount
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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

Estimated cost to implement procedures for the records needed for the new connector monitoring and begin 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. The Date Required is the investigation date 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	\$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

Screening Date 22-Sep-2020 Respondent SI Group, Inc. Case ID No. 59891 Reg. Ent. Reference No. RN100218999 Media Air Enf. Coordinator Danielle Porras	Docket No. 2020-1255-AIR-E	PCW <i>Policy Revision 4 (April 2014)</i> <i>PCW Revision March 26, 2014</i>																
Violation Number 33																		
Rule Cite(s) 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)																		
Violation Description 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.																		
Base Penalty		\$25,000																
>> Environmental, Property and Human Health Matrix																		
OR	<table border="1" style="margin: auto;"> <tr> <td></td> <th colspan="3">Harm</th> </tr> <tr> <th>Release</th> <th>Major</th> <th>Moderate</th> <th>Minor</th> </tr> <tr> <td>Actual</td> <td style="border: 1px solid black;"></td> <td style="border: 1px solid black;"></td> <td style="border: 1px solid black;"></td> </tr> <tr> <td>Potential</td> <td style="border: 1px solid black;"></td> <td style="border: 1px solid black;"></td> <td style="border: 1px solid black;"></td> </tr> </table>		Harm			Release	Major	Moderate	Minor	Actual				Potential				Percent 0.0%
		Harm																
	Release	Major	Moderate	Minor														
Actual																		
Potential																		
>> Programmatic Matrix																		
	<table border="1" style="margin: auto;"> <tr> <td></td> <th>Falsification</th> <th>Major</th> <th>Moderate</th> <th>Minor</th> </tr> <tr> <td></td> <td style="border: 1px solid black;"></td> <td style="border: 1px solid black; text-align: center;">x</td> <td style="border: 1px solid black;"></td> <td style="border: 1px solid black;"></td> </tr> </table>		Falsification	Major	Moderate	Minor			x			Percent 15.0%						
	Falsification	Major	Moderate	Minor														
		x																
Matrix Notes	100% of the rule requirements were not met.																	
Adjustment		\$21,250																
		\$3,750																
Violation Events																		
Number of Violation Events 1		224 Number of violation days																
	<table border="1" style="margin: auto;"> <tr><td>daily</td><td style="border: 1px solid black;"></td></tr> <tr><td>weekly</td><td style="border: 1px solid black;"></td></tr> <tr><td>monthly</td><td style="border: 1px solid black;"></td></tr> <tr><td>quarterly</td><td style="border: 1px solid black;"></td></tr> <tr><td>semiannual</td><td style="border: 1px solid black;"></td></tr> <tr><td>annual</td><td style="border: 1px solid black;"></td></tr> <tr><td>single event</td><td style="border: 1px solid black; text-align: center;">x</td></tr> </table>	daily		weekly		monthly		quarterly		semiannual		annual		single event	x	Violation Base Penalty \$3,750		
daily																		
weekly																		
monthly																		
quarterly																		
semiannual																		
annual																		
single event	x																	
One single event is recommended for the missing record.																		
Good Faith Efforts to Comply		Reduction \$937																
Before NOE/NOV NOE/NOV to EDPRP/Settlement Offer																		
Extraordinary 																		
Ordinary x																		
N/A 																		
Notes The Respondent completed the corrective measures on June 30, 2020, prior to the NOE dated August 28, 2020. 																		
Violation Subtotal		\$2,813																
Economic Benefit (EB) for this violation		Statutory Limit Test																
Estimated EB Amount \$46		Violation Final Penalty Total \$6,188																
This violation Final Assessed Penalty (adjusted for limits)		\$6,188																

Economic Benefit Worksheet

Respondent SI Group, Inc.
Case ID No. 59891
Reg. Ent. Reference No. RN100218999
Media Air
Violation No. 33

Percent Interest	Years of Depreciation
5.0	15

Item Description	Item Cost	Date Required	Final Date	Yrs	Interest Saved	Costs Saved	EB Amount
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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

Estimated cost to implement procedures for the records needed for the calibration of the monitoring instruments and begin 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. The Date Required is the investigation date 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	\$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

Screening Date 22-Sep-2020 Respondent SI Group, Inc. Case ID No. 59891 Reg. Ent. Reference No. RN100218999 Media Air Enf. Coordinator Danielle Porras	Docket No. 2020-1255-AIR-E	PCW <i>Policy Revision 4 (April 2014)</i> <i>PCW Revision March 26, 2014</i>
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Violation Number	34	
Rule Cite(s)	30 Tex. Admin. Code §§ 101.20(1), 115.356(3)(C), and 122.143(4), 40 CFR § 60.480(d)(1), FOP No. O1431, GTC and STC No. 1.A, and Tex. Health & Safety Code § 382.085(b)	
Violation Description	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.	

Base Penalty	\$25,000
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>> Environmental, Property and Human Health Matrix

OR	Release	Harm			
		Major Moderate Minor			
	Actual	<input type="text"/>	<input type="text"/>	<input type="text"/>	
	Potential	<input type="text"/>	<input type="text"/>	<input type="text"/>	Percent <input style="width: 50px;" type="text" value="0.0%"/>

>> Programmatic Matrix

	Falsification	Major	Moderate	Minor	
	<input type="text"/>	<input checked="" type="text" value="x"/>	<input type="text"/>	<input type="text"/>	
					Percent <input style="width: 50px;" type="text" value="15.0%"/>

Matrix Notes	100% of the rule requirements were not met.
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Adjustment	\$21,250
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	\$3,750
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Violation Events

Number of Violation Events	1	224	Number of violation days
----------------------------	---	-----	--------------------------

	daily	<input type="text"/>		
	weekly	<input type="text"/>		
	monthly	<input type="text"/>		
	quarterly	<input type="text"/>		
	semiannual	<input type="text"/>		
	annual	<input type="text"/>		
	single event	<input checked="" type="text" value="x"/>		

One single event is recommended for the missing record.	
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Good Faith Efforts to Comply	25.0%	Reduction	\$937
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	Before NOE/NOV	NOE/NOV to EDPRP/Settlement Offer	
Extraordinary	<input type="text"/>	<input type="text"/>	
Ordinary	<input checked="" type="text" value="x"/>	<input type="text"/>	
N/A	<input type="text"/>	<input type="text"/>	

Notes	The Respondent completed the corrective measures on June 30, 2020, prior to the NOE dated August 28, 2020.
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Violation Subtotal	\$2,813
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Economic Benefit (EB) for this violation

Estimated EB Amount	\$46
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Statutory Limit Test

Violation Final Penalty Total	\$6,188
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This violation Final Assessed Penalty (adjusted for limits)	\$6,188
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Economic Benefit Worksheet

Respondent SI Group, Inc.
Case ID No. 59891
Reg. Ent. Reference No. RN100218999
Media Air
Violation No. 34

Percent Interest	Years of Depreciation
5.0	15

Item Description	Item Cost	Date Required	Final Date	Yrs	Interest Saved	Costs Saved	EB Amount
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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

Estimated cost to implement procedures for the records needed for exempt components and begin maintaining records by the process unit that identifies and justifies each exemption by component claimed under 30 Tex. Admin. Code § 115.357. The Date Required is the investigation date 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	\$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

Screening Date 22-Sep-2020 Respondent SI Group, Inc. Case ID No. 59891 Reg. Ent. Reference No. RN100218999 Media Air Enf. Coordinator Danielle Porras	Docket No. 2020-1255-AIR-E	PCW <i>Policy Revision 4 (April 2014)</i> <i>PCW Revision March 26, 2014</i>		
Violation Number 35				
Rule Cite(s) 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)				
Violation Description Failed to maintain records of all equipment subject to the 40 CFR Part 60 Subpart VV requirements on site.				
Base Penalty		\$25,000		
>> Environmental, Property and Human Health Matrix				
OR	Release Actual Potential	Harm Major Moderate Minor	Percent 0.0%	
>> Programmatic Matrix				
	Falsification Major Moderate Minor		Percent 15.0%	
	x			
Matrix Notes	100% of the rule requirements were not met.			
Adjustment		\$21,250		
		\$3,750		
Violation Events				
Number of Violation Events		1	224	
		Number of violation days		
	daily weekly monthly quarterly semiannual annual single event	 x	Violation Base Penalty \$3,750	
One single event is recommended for the missing record.				
Good Faith Efforts to Comply		25.0%	Reduction \$937	
		Before NOE/NOV NOE/NOV to EDPRP/Settlement Offer		
	Extraordinary Ordinary N/A	 x 		
Notes		The Respondent completed the corrective measures on June 30, 2020, prior to the NOE dated August 28, 2020.		
Violation Subtotal		\$2,813		
Economic Benefit (EB) for this violation				
Estimated EB Amount		\$46	Statutory Limit Test	
		Violation Final Penalty Total	\$6,188	
This violation Final Assessed Penalty (adjusted for limits)		\$6,188		

Economic Benefit Worksheet

Respondent SI Group, Inc.
Case ID No. 59891
Reg. Ent. Reference No. RN100218999
Media Air
Violation No. 35

Percent Interest	Years of Depreciation
5.0	15

Item Description	Item Cost	Date Required	Final Date	Yrs	Interest Saved	Costs Saved	EB Amount
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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

Estimated cost to implement procedures for the records needed for the equipment subject to the 40 CFR Part 60 Subpart VV requirements and begin maintaining records for all equipment subject to the 40 CFR Part 60 Subpart VV requirements. The Date Required is the investigation date 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	\$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

Screening Date 22-Sep-2020 Respondent SI Group, Inc. Case ID No. 59891 Reg. Ent. Reference No. RN100218999 Media Air Enf. Coordinator Danielle Porras	Docket No. 2020-1255-AIR-E	PCW <i>Policy Revision 4 (April 2014)</i> <i>PCW Revision March 26, 2014</i>									
Violation Number 36											
Rule Cite(s) 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)											
Violation Description 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.											
Base Penalty		\$25,000									
>> Environmental, Property and Human Health Matrix											
OR	Release Actual Potential	Harm Major Moderate Minor <div style="display: flex; justify-content: space-around;"> <div style="border: 1px solid black; width: 40px; height: 20px;"></div> <div style="border: 1px solid black; width: 40px; height: 20px;"></div> <div style="border: 1px solid black; width: 40px; height: 20px;"></div> </div>	Percent 0.0%								
>> Programmatic Matrix											
	Falsification <div style="border: 1px solid black; width: 40px; height: 20px;"></div>	Major Moderate Minor <div style="display: flex; justify-content: space-around;"> <div style="border: 1px solid black; width: 40px; height: 20px; text-align: center;">x</div> <div style="border: 1px solid black; width: 40px; height: 20px;"></div> <div style="border: 1px solid black; width: 40px; height: 20px;"></div> </div>	Percent 15.0%								
Matrix Notes	100% of the rule requirements were not met.										
Adjustment		\$21,250									
		\$3,750									
Violation Events											
Number of Violation Events 2		Number of violation days 180									
	<div style="border: 1px solid black; padding: 2px;"> daily weekly monthly quarterly semiannual annual single event </div>	<div style="border: 1px solid black; padding: 2px;"> <div style="border: 1px solid black; width: 40px; height: 20px;"></div> <div style="border: 1px solid black; width: 40px; height: 20px;"></div> <div style="border: 1px solid black; width: 40px; height: 20px;"></div> <div style="border: 1px solid black; width: 40px; height: 20px;"></div> <div style="border: 1px solid black; width: 40px; height: 20px;"></div> <div style="border: 1px solid black; width: 40px; height: 20px;"></div> <div style="border: 1px solid black; width: 40px; height: 20px; text-align: center;">x</div> </div>	Violation Base Penalty \$7,500								
Two single events are recommended (one event for each missing record).											
Good Faith Efforts to Comply		Reduction \$1,875									
<div style="display: flex; justify-content: space-between; font-size: small;"> Before NOE/NOV NOE/NOV to EDPRP/Settlement Offer </div> <table style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 30%;">Extraordinary</td> <td style="width: 30%; border: 1px solid black; height: 20px;"></td> <td style="width: 30%; border: 1px solid black; height: 20px;"></td> </tr> <tr> <td>Ordinary</td> <td style="border: 1px solid black; text-align: center;">x</td> <td style="border: 1px solid black; height: 20px;"></td> </tr> <tr> <td>N/A</td> <td style="border: 1px solid black; height: 20px;"></td> <td style="border: 1px solid black; height: 20px;"></td> </tr> </table>			Extraordinary			Ordinary	x		N/A		
Extraordinary											
Ordinary	x										
N/A											
Notes The Respondent completed the corrective measures on August 21, 2018, prior to the NOE dated August 28, 2020.											
Violation Subtotal		\$5,625									
Economic Benefit (EB) for this violation											
Estimated EB Amount		\$37									
Statutory Limit Test											
Violation Final Penalty Total		\$12,375									
This violation Final Assessed Penalty (adjusted for limits)		\$12,375									

Economic Benefit Worksheet

Respondent SI Group, Inc.
Case ID No. 59891
Reg. Ent. Reference No. RN100218999
Media Air
Violation No. 36

Percent Interest	Years of Depreciation
5.0	15

Item Description	Item Cost	Date Required	Final Date	Yrs	Interest Saved	Costs Saved	EB Amount
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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

Estimated cost to begin 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. The Date Required is the first date of non-compliance 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	\$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	Rating:	0.00
Regulated Entity:	RN100218999, SI Group Texas Operations	Classification:	HIGH	Rating:	0.00
Complexity Points:	20	Repeat Violator:	NO		
CH Group:	05 - Chemical Manufacturing				
Location:	702 Farm-to-Market Road 523, Freeport, Brazoria County, Texas				
TCEQ Region:	REGION 12 - HOUSTON				

ID Number(s):

AIR OPERATING PERMITS ACCOUNT NUMBER BL0048R

AIR NEW SOURCE PERMITS PERMIT 2341

AIR NEW SOURCE PERMITS REGISTRATION 48692

AIR NEW SOURCE PERMITS REGISTRATION 169346

AIR NEW SOURCE PERMITS PERMIT 84092

AIR NEW SOURCE PERMITS REGISTRATION 111464

AIR NEW SOURCE PERMITS REGISTRATION 124346

AIR NEW SOURCE PERMITS REGISTRATION 169557

AIR NEW SOURCE PERMITS REGISTRATION 142343

WASTEWATER PERMIT WQ0001961000

AIR EMISSIONS INVENTORY ACCOUNT NUMBER BL0048R

INDUSTRIAL AND HAZARDOUS WASTE EPA ID
TXD010797389

AIR OPERATING PERMITS PERMIT 1431

AIR NEW SOURCE PERMITS REGISTRATION 29053

AIR NEW SOURCE PERMITS ACCOUNT NUMBER BL0048R

AIR NEW SOURCE PERMITS AFS NUM 4803900033

AIR NEW SOURCE PERMITS PERMIT 139407

AIR NEW SOURCE PERMITS REGISTRATION 111605

AIR NEW SOURCE PERMITS REGISTRATION 111467

AIR NEW SOURCE PERMITS REGISTRATION 164667

USED OIL ID NUMBER HOU00073

WASTEWATER EPA ID TX0067946

POLLUTION PREVENTION PLANNING ID NUMBER
P00611

INDUSTRIAL AND HAZARDOUS WASTE SOLID WASTE
REGISTRATION # (SWR) 30763

Compliance History Period: September 01, 2017 to August 31, 2022 **Rating Year:** 2022 **Rating Date:** 09/01/2022

Date Compliance History Report Prepared: December 01, 2022

Agency Decision Requiring Compliance History: Enforcement

Component Period Selected: December 01, 2017 to December 01, 2022

TCEQ Staff Member to Contact for Additional Information Regarding This Compliance History.

Name: Danielle Porras

Phone: (713) 767-3682

Site and Owner/Operator History:

- | | |
|--|-----|
| 1) Has the site been in existence and/or operation for the full five year compliance period? | YES |
| 2) Has there been a (known) change in ownership/operator of the site during the compliance period? | NO |

Components (Multimedia) for the Site Are Listed in Sections A - J

A. Final Orders, court judgments, and consent decrees:

- | | | | |
|---|---|----------------------------|--|
| 1 | Effective Date: 12/12/2018 | ADMINORDER 2017-1144-AIR-E | (Findings Order-Agreed Order Without Denial) |
| | 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)(1) | | |
| | 30 TAC Chapter 122, SubChapter B 122.143(4) | | |
| | 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)

Rqmt 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).

- 2 Effective Date: 09/10/2019 ADMINORDER 2018-1549-IWD-E (1660 Order-Agreed Order With Denial)
Classification: Moderate
Citation: 2D TWC Chapter 26, SubChapter A 26.121(a)(1)
30 TAC Chapter 305, SubChapter F 305.125(1)
Rqmt 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.
- 3 Effective Date: 12/17/2019 ADMINORDER 2019-0237-AIR-E (1660 Order-Agreed Order With Denial)
Classification: Moderate
Citation: 30 TAC Chapter 122, SubChapter B 122.143(4)
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)).
- 4 Effective Date: 12/18/2019 ADMINORDER 2018-1474-AIR-E (1660 Order-Agreed Order With Denial)
Classification: Minor
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: FOP O1431, 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, 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.

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.):

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.

1	Date: 06/30/2022 (1762629)	
	Self Report? NO	Classification: Moderate
	Citation: 2341 PERMIT 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) O1431 OP	
	Description: Failure to maintain Natural Gas Content limit of 28 % by volume for Flare [EPN: P3014, Unit ID: X-501] (Category B17)	
	Self Report? NO	Classification: Moderate
	Citation: 2341 PERMIT 30 TAC Chapter 116, SubChapter B 116.115(c) 30 TAC Chapter 122, SubChapter B 122.143(4) 5C THSC Chapter 382 382.085(b) O1431 OP	
	Description: Failure to maintain Natural Gas Content limit of 28 % by volume for Flare [EPN: EPN: P6001, Unit ID: X-695] (Category B17)	
	Self Report? NO	Classification: Moderate
	Citation: 30 TAC Chapter 111, SubChapter A 111.111(a)(4)(A)(ii) 30 TAC Chapter 122, SubChapter B 122.143(4) 5C THSC Chapter 382 382.085(b) O1431 OP	
	Description: Failure to perform daily visible emissions checks for Flare [Unit IDs: X-401, X-501, X-601, X-602, X-695, & X-794] (Category C1)	
	Self Report? NO	Classification: Moderate
	Citation: 2341 PERMIT 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 Kb 60.112b(a)(3)(i) 5C THSC Chapter 382 382.085(b) O1431 OP	
	Description: Failure to maintain the operational parameters of Vapor Recovery System for Flare [EPN: P3014, Unit ID: X-501] (Category B18g.(1))	
	Self Report? NO	Classification: Moderate
	Citation: 2341 PERMIT 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) O1431 OP	
	Description: Failure to collect and/or analyze daily conductivity samples for Cooling Towers [EPNs: W-501, W-502 & W-503] (Category B1)	
	Self Report? NO	Classification: Moderate
	Citation: 2341 PERMIT 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) O1431 OP	

Description: Failure to maintain pilot flame for Flare [EPN: P4004; Unit ID: Flare X-401]
(Category B17)

Self Report? NO Classification: Moderate

Citation: 2341 PERMIT
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)
O1431 OP

Description: Failure to maintain pilot flame for Flare [EPN: PX501; Unit ID: Flare X-501]
(Category B17)

Self Report? NO Classification: Moderate

Citation: 2341 PERMIT
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)
O1431 OP

Description: Failure to maintain pilot flame for Flare [EPN: P3015; Unit ID: Flare X-602]
(Category B17)

Self Report? NO Classification: Moderate

Citation: 2341 PERMIT
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)
O1431 OP

Description: Failure to maintain pilot flame for Flare [EPN: P7002; Unit ID: Flare X- 794]
(Category B17)

Self Report? NO Classification: Moderate

Citation: 30 TAC Chapter 101, SubChapter F 101.201(b)(2)
30 TAC Chapter 122, SubChapter B 122.143(4)
5C THSC Chapter 382 382.085(b)
O1431 OP

Description: Failure to document required information for non-reportable emission events
(Category B1)

Self Report? NO Classification: Moderate

Citation: 2341 PERMIT
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)(3)(i)(B)(ii)
5C THSC Chapter 382 382.085(b)
O1431 OP

Description: Failure to maintain heating value of 300 British Thermal Unit per standard cubic
feet (Btu/scf) or greater for Flare [EPN: X-794] (Category C7)

Self Report? NO Classification: Moderate

Citation: 30 TAC Chapter 122, SubChapter B 122.143(4)
5C THSC Chapter 382 382.085(b)
O1431 OP

Description: Failure to document degreaser inspections for degreaser [EPN: DEGREASE]
(Category B1)

Self Report? NO Classification: Moderate

Citation: 2341 PERMIT
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)
O1431 OP

Description: Failure to prevent exceedances of volatile organic compounds (VOC) limits (in
lb/hr) for Storage Tanks (Category B17)

Self Report? NO Classification: Moderate

Citation: 2341 PERMIT
30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)
5C THSC Chapter 382 382.085(b)
O1431 OP

Description: Failure to collect and/or analyze weekly Total Dissolved Solids (TDS) samples for
Cooling Towers [EPNs: W-501, W-502 & W-503] (Category B1)

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 from F-322 resulting in unauthorized 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

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-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-xlenol 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-xlenol, but the 2,6-xlenol 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-xlenol 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
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-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

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 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

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 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

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 backed up into TF-0 N2 system causing release of emissions.

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 E-402 reboiler level instrument bridge due to design of piping. Residual chemical was released when bridge 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)

Description: Failure to maintain equipment. Pin hole leak in Tank F-737 butylene discharge line at strainers.

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 maintain 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)

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
 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-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
 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. 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 O1431.
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

Citation: 30 TAC Chapter 115, SubChapter C 115.216(3)(B)

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 > 0.5 psia, 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 always be confirmed.

Viol. Classification: Moderate

Citation: 30 TAC Chapter 101, SubChapter A 101.20

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

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

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 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 at the facility.

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 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

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, 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

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, 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

Citation: 30 TAC Chapter 122, SubChapter B 122.143
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
Citation: 30 TAC Chapter 122, SubChapter B 122.143
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
Citation: 30 TAC Chapter 122, SubChapter B 122.143
30 TAC Chapter 122, SubChapter B 122.144
Description: Failure to continuously monitor temperature for tank F-414.

Viol. Classification: Moderate
Citation: 30 TAC Chapter 122, SubChapter B 122.143
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
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(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
Citation: 30 TAC Chapter 122, SubChapter B 122.144

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):

N/A

H. Voluntary on-site compliance assessment dates:

N/A

I. Participation in a voluntary pollution reduction program:

N/A

J. Early compliance:

N/A

Sites Outside of Texas:

N/A

Appendix A
All NOV's Issued During Component Period 12/1/2017 and 12/1/2022

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5C THSC Chapter 382 382.085(b)
 Special Condition 4D PA
 Special Term & Condition 11 OP
 Description: Failure to prevent an exceedance of the waste gas stream flow to Flare X-501 (EPN PX501) (Category B18(g)(1)).
 Self Report? NO Classification: Minor
 Citation: 30 TAC Chapter 122, SubChapter B 122.143(4)
 30 TAC Chapter 122, SubChapter B 122.145(2)(A)
 5C THSC Chapter 382 382.085(b)
 General Terms & Conditions OP
 Description: Failure to report all deviations (Category B3).
 Self Report? NO Classification: Minor
 Citation: 30 TAC Chapter 122, SubChapter B 122.143(4)
 30 TAC Chapter 122, SubChapter B 122.145(2)(A)
 5C THSC Chapter 382 382.085(b)
 General Terms & Conditions OP
 Description: Failure to report all deviations (Category B3).
 Self Report? NO Classification: Minor
 Citation: 30 TAC Chapter 122, SubChapter B 122.143(4)
 30 TAC Chapter 122, SubChapter B 122.145(2)(A)
 5C THSC Chapter 382 382.085(b)
 General Terms & Conditions OP
 Description: Failure to report all deviations (Category B3).
 Self Report? NO Classification: Minor
 Citation: 30 TAC Chapter 122, SubChapter B 122.143(4)
 30 TAC Chapter 122, SubChapter B 122.145(2)(A)
 5C THSC Chapter 382 382.085(b)
 General Terms & Conditions OP
 Description: Failure to report all deviations (Category B3).
 Self Report? NO Classification: Minor
 Citation: 30 TAC Chapter 115, SubChapter E 115.412(1)
 30 TAC Chapter 122, SubChapter B 122.143(4)
 Periodic Monitoring Summary OP
 Special Term & Condition 10 OP
 Description: Failure to conduct monthly visual inspection for degreaser (Category C1).
 Self Report? NO Classification: Minor
 Citation: 30 TAC Chapter 115, SubChapter D 115.354(5)
 30 TAC Chapter 122, SubChapter B 122.143(4)
 40 CFR Chapter 60, SubChapter C, PT 60, SubPT VV 60.486(b)(1)
 5C THSC Chapter 382 382.085(b)
 Special Term & Condition 1A OP
 Description: Failure to attach a leak tag on a component (Category C3).
 Self Report? NO Classification: Moderate
 Citation: 30 TAC Chapter 116, SubChapter B 116.116(a)(1)
 30 TAC Chapter 122, SubChapter B 122.143(4)
 5C THSC Chapter 382 382.085(b)
 Special Term & Condition 11 OP
 Description: Failure to comply with permit representation for vent gas to a control device (Category B17).
 Self Report? NO Classification: Moderate
 Citation: 30 TAC Chapter 116, SubChapter B 116.116(a)(1)
 30 TAC Chapter 122, SubChapter B 122.143(4)
 5C THSC Chapter 382 382.085(b)
 Special Term & Condition 11 OP
 Description: Failure to comply with permit representation for multiple tanks (Category B17).

6 Date: 06/30/2019 (1593990)
 Self Report? YES Classification: Moderate
 Citation: 2D TWC Chapter 26, SubChapter A 26.121(a)
 30 TAC Chapter 305, SubChapter F 305.125(1)
 Description: Failure to meet the limit for one or more permit parameter

7 Date: 09/30/2019 (1614055)
 Self Report? YES Classification: Moderate

Citation: 2D TWC Chapter 26, SubChapter A 26.121(a)
30 TAC Chapter 305, SubChapter F 305.125(1)
Description: Failure to meet the limit for one or more permit parameter

8 Date: 03/31/2020 (1654339)
Self Report? YES Classification: Moderate
Citation: 2D TWC Chapter 26, SubChapter A 26.121(a)
30 TAC Chapter 305, SubChapter F 305.125(1)
Description: Failure to meet the limit for one or more permit parameter

9 Date: 08/31/2020 (1592472)
Self Report? NO 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)
Special Condition 4D PERMIT
Special Term & Condition 11 OP
Description: Failure to maintain a fuel gas concentration of 28% in the vent stream for Flare X-501 (EPN: PX501). (Category C4)
Self Report? NO Classification: Minor
Citation: 30 TAC Chapter 122, SubChapter B 122.143(4)
5C THSC Chapter 382 382.085(b)
Special Term & Condition 3A(iii)(1) OP
Description: Failure to conduct quarterly visible emission observation for the Wastewater Diesel Pump J-522A (EPN: P1031). (Category B1)
Self Report? NO 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)
Special Condition 19 PERMIT
Special Term & Condition 11 OP
Description: Failure to maintain Baghouse R-301 (EPN: P1019) exhaust temperature below the limit. (Category C4)
Self Report? NO Classification: Minor
Citation: 30 TAC Chapter 122, SubChapter B 122.143(4)
5C THSC Chapter 382 382.085(b)
Periodic Monitoring Summary OP
Special Term & Condition 10 OP
Description: Failure to conduct monthly visual inspection for degreaser (Unit ID: DEGREASE). (Category C3)
Self Report? NO Classification: Minor
Citation: 30 TAC Chapter 111, SubChapter A 111.111(a)(4)(A)
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)(1)
5C THSC Chapter 382 382.085(b)
Special Condition 14(C) PERMIT
Special Term & Condition 11 OP
Special Term & Condition 1A OP
Description: Failure to prevent Flare X-601 (EPN: P3014) from smoking for more than five minutes during a two hour period. (Category C4)
Self Report? NO Classification: Moderate
Citation: 30 TAC Chapter 111, SubChapter A 111.111(a)(4)(A)
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)(1)
5C THSC Chapter 382 382.085(b)
Special Condition 14(C) PERMIT
Special Term & Condition 11 OP
Special Term & Condition 1A OP

Description: Failure to prevent Flare X-695 (EPN: P6001) from smoking for more than five minutes during a two hour period. (Category C4)

Self Report? NO 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)
 Special Condition 1 PERMIT
 Special Term and Condition 11 OP

Description: Failure to prevent the exceedance of hourly VOC emission rate limits for storage tanks. (Category B13)

10

Date: 12/07/2020 (1672558)

Self Report? NO Classification: Minor

Citation:
 30 TAC Chapter 111, SubChapter A 111.111(a)(4)(A)(ii)
 30 TAC Chapter 122, SubChapter B 122.143(4)
 5C THSC Chapter 382 382.085(b)
 Special Term & Condition 1A OP

Description: Failure to conduct daily visible emission observations. (CATEGORY C1 Violation)

Self Report? NO 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)
 Special Condition 5D PERMIT
 Special Term & Condition 11 OP

Description: Failure to maintain natural gas content for Flare (Unit ID: X-501). (CATEGORY C4 Violation)

Self Report? NO Classification: Moderate

Citation:
 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 Kb 60.112b(a)(3)(i)
 5C THSC Chapter 382 382.085(b)
 General Condition 9 PERMIT
 Special Term & Condition 11 OP

Description: Failure to maintain vapor recovery system for Flare (Unit ID: X-501). (CATEGORY C4 Violation)

Self Report? NO 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)
 FOP, Special Term and Condition 11 OP
 NSR, Special Condition 1 PERMIT

Description: Failure to maintain hourly VOC emission rates within permitted limits for storage tanks. (CATEGORY C4 Violation)

Self Report? NO Classification: Moderate

Citation:
 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)
 Special Condition 5B PERMIT
 Special Term & Condition 11 OP

Description: Failure to maintain pilot for Flare (Unit ID: X-401). (CATEGORY C4 Violation)

Self Report? NO Classification: Moderate

Citation:
 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)
 Special Condition 5B PERMIT
 Special Term & Condition 11 OP
 Special Term & Condition 1A OP

Description: Failure to maintain pilot for Flare (Unit ID: X-501). (CATEGORY B13 Violation)

Self Report? NO Classification: Moderate
Citation:
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)
Special Condition 5B PERMIT
Special Term & Condition 11 OP
Special Term & Condition 1A OP
Description: Failure to maintain pilot for Flare (Unit ID: X-602). (CATEGORY C4 Violation)
Self Report? NO 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)
Special Condition 19 PERMIT
Special Term & Condition 11 OP
Description: Failure to conduct weekly visible emissions observations for the Flaking Plant Baghouse (Unit ID: R-301). (CATEGORY B1 Violation)
Self Report? NO 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)
Special Condition 16 PERMIT
Special Term & Condition 11 OP
Description: Failure to conduct daily sampling analysis for Wastewater Surge Tank (Unit ID: F-1001). (CATEGORY B1 Violation)
Self Report? NO Classification: Minor
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)
Special Condition 7B PERMIT
Special Term & Condition 11 OP
Description: Failure to conduct daily conductivity for Cooling Towers (Unit IDs: W-501; W-502; and W-503). (CATEGORY C1 Violation)
Self Report? NO 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)
FOP, Special Term & Condition 11 OP
NSR, Special Condition 7B PERMIT
Description: Failure to conduct weekly total dissolved solids (TDS) sampling on Cooling Towers (Unit IDs: W-501; W-502; and W-503). (Category C1)

11 Date: 02/28/2021 (1727954)
Self Report? YES Classification: Moderate
Citation:
2D TWC Chapter 26, SubChapter A 26.121(a)
30 TAC Chapter 305, SubChapter F 305.125(1)
Description: Failure to meet the limit for one or more permit parameter

12* Date: 09/30/2021 (1777638)
Self Report? YES Classification: Moderate
Citation:
2D TWC Chapter 26, SubChapter A 26.121(a)
30 TAC Chapter 305, SubChapter F 305.125(1)
Description: Failure to meet the limit for one or more permit parameter

13* Date: 10/31/2021 (1784437)
Self Report? YES Classification: Moderate
Citation:
2D TWC Chapter 26, SubChapter A 26.121(a)
30 TAC Chapter 305, SubChapter F 305.125(1)

Description: Failure to meet the limit for one or more permit parameter

14* Date: 06/30/2022 (1762629)

Self Report? NO Classification: Moderate

Citation:

2341 PERMIT
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)
O1431 OP

Description: Failure to maintain Natural Gas Content limit of 28 % by volume for Flare [EPN: P3014, Unit ID: X-501] (Category B17)

Self Report? NO Classification: Moderate

Citation:

2341 PERMIT
30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)
5C THSC Chapter 382 382.085(b)
O1431 OP

Description: Failure to maintain Natural Gas Content limit of 28 % by volume for Flare [EPN: EPN: P6001, Unit ID: X-695] (Category B17)

Self Report? NO Classification: Moderate

Citation:

30 TAC Chapter 111, SubChapter A 111.111(a)(4)(A)(ii)
30 TAC Chapter 122, SubChapter B 122.143(4)
5C THSC Chapter 382 382.085(b)
O1431 OP

Description: Failure to perform daily visible emissions checks for Flare [Unit IDs: X-401, X-501, X-601, X-602, X-695, & X-794] (Category C1)

Self Report? NO Classification: Moderate

Citation:

2341 PERMIT
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 Kb 60.112b(a)(3)(i)
5C THSC Chapter 382 382.085(b)
O1431 OP

Description: Failure to maintain the operational parameters of Vapor Recovery System for Flare [EPN: P3014, Unit ID: X-501] (Category B18g.(1))

Self Report? NO Classification: Moderate

Citation:

2341 PERMIT
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)
O1431 OP

Description: Failure to collect and/or analyze daily conductivity samples for Cooling Towers [EPNs: W-501, W-502 & W-503] (Category B1)

Self Report? NO Classification: Moderate

Citation:

2341 PERMIT
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)
O1431 OP

Description: Failure to maintain pilot flame for Flare [EPN: P4004; Unit ID: Flare X-401] (Category B17)

Self Report? NO Classification: Moderate

Citation:

2341 PERMIT
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)
O1431 OP

Description: Failure to maintain pilot flame for Flare [EPN: PX501; Unit ID: Flare X-501] (Category B17)

Self Report? NO Classification: Moderate

Citation:	2341 PERMIT 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) O1431 OP		
Description:	Failure to maintain pilot flame for Flare [EPN: P3015; Unit ID: Flare X-602] (Category B17)		
Self Report?	NO	Classification:	Moderate
Citation:	2341 PERMIT 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) O1431 OP		
Description:	Failure to maintain pilot flame for Flare [EPN: P7002; Unit ID: Flare X- 794] (Category B17)		
Self Report?	NO	Classification:	Moderate
Citation:	30 TAC Chapter 101, SubChapter F 101.201(b)(2) 30 TAC Chapter 122, SubChapter B 122.143(4) 5C THSC Chapter 382 382.085(b) O1431 OP		
Description:	Failure to document required information for non-reportable emission events (Category B1)		
Self Report?	NO	Classification:	Moderate
Citation:	2341 PERMIT 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)(3)(i)(B)(ii) 5C THSC Chapter 382 382.085(b) O1431 OP		
Description:	Failure to maintain heating value of 300 British Thermal Unit per standard cubic feet (Btu/scf) or greater for Flare [EPN: X-794] (Category C7)		
Self Report?	NO	Classification:	Moderate
Citation:	30 TAC Chapter 122, SubChapter B 122.143(4) 5C THSC Chapter 382 382.085(b) O1431 OP		
Description:	Failure to document degreaser inspections for degreaser [EPN: DEGREASE] (Category B1)		
Self Report?	NO	Classification:	Moderate
Citation:	2341 PERMIT 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) O1431 OP		
Description:	Failure to prevent exceedances of volatile organic compounds (VOC) limits (in lb/hr) for Storage Tanks (Category B17)		
Self Report?	NO	Classification:	Moderate
Citation:	2341 PERMIT 30 TAC Chapter 116, SubChapter B 116.115(c) 30 TAC Chapter 122, SubChapter B 122.143(4) 5C THSC Chapter 382 382.085(b) O1431 OP		
Description:	Failure to collect and/or analyze weekly Total Dissolved Solids (TDS) samples for Cooling Towers [EPNs: W-501, W-502 & W-503] (Category B1)		

* NOV's applicable for the Compliance History rating period 9/1/2017 to 8/31/2022

Appendix B

All Investigations Conducted During Component Period December 01, 2017 and December 01, 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*	September 17, 2020**	(1687730)
Item 41*	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)

* 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

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;
- l. 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. O1431, 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. 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 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. O1431, 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. O1431, 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. 01431, 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. O1431, 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. O1431, 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. O1431, 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. O1431, 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. O1431, 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. O1431, 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 one-hour 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. O1431, 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. O1431, 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. 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 net heating values for the flared gas was recorded at least once every 15 minutes.
22. 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. 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 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. 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 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. 01431, 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. 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 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. 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 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. 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, 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. 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 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

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.

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

06/26/2023

Date

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:*

Instructions: Send the original, signed Order with penalty payment to the Financial Administration Division, Revenue Operations Section at the address in Ordering Provision 1 of this Order.