### Executive Summary – Enforcement Matter – Case No. 60259 INV Performance Surfaces, LLC RN102663671 Docket No. 2021-0086-AIR-E

**Order Type:** Findings Agreed Order **Findings Order Justification:** Three or more enforcement actions (NOVs, orders, etc.) over the prior five year period for the same violation(s). Media: AIR **Small Business:** No Location(s) Where Violation(s) Occurred: INV Nylon Chemicals Americas Victoria Site, 2695 Old Bloomington Road North, near Victoria, Victoria County **Type of Operation:** Chemical production plant **Other Significant Matters:** Additional Pending Enforcement Actions: Yes, Docket Nos. 2021-0858-WDW-E and 2019-1004-MLM-E Past-Due Penalties: No Other: N/A Interested Third-Parties: None Texas Register Publication Date: July 23, 2021 Comments Received: No **Penalty Information** Total Penalty Assessed: \$21,575 Total Paid to General Revenue: \$21,575 Total Due to General Revenue: \$0

Payment Plan: N/A Compliance History Classifications: Person/CN - Satisfactory Site/RN - Satisfactory 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 10, 2020 through November 24, 2020 and September 29, 2020 through November 3, 2020 **Date(s) of NOE(s):** December 16, 2020 and January 11, 2021

### Executive Summary – Enforcement Matter – Case No. 60259 INV Performance Surfaces, LLC RN102663671 Docket No. 2021-0086-AIR-E

## Violation Information

1. Failed to submit an initial notification for a reportable emissions event no later than 24 hours after the discovery of an emissions event [30 TEX. ADMIN. CODE §§ 101.201(a)(1)(B) and 122.143(4), Federal Operating Permit ("FOP") No. O1904, General Terms and Conditions ("GTC") and Special Terms and Conditions ("STC") No. 2.F, and TEX. HEALTH & SAFETY CODE § 382.085(b)].

2. Failed to prevent unauthorized emissions. Since the Respondent did not comply with the emissions event reporting requirements, the emissions event was not caused by a sudden unavoidable breakdown of equipment or process beyond the control of the owner or operator, and the emissions event could have been avoided by better design and/or better operational and maintenance practices, the Respondent is precluded from asserting an affirmative defense under 30 TEX. ADMIN. CODE § 101.222 [30 TEX. ADMIN. CODE §§ 101.20(3), 116.115(c), and 122.143(4), New Source Review ("NSR") Permit Nos. 7186, PSDTX1079M2, and GHGPSDTX145M1, Special Conditions ("SC") No. 1, FOP No. O1904, GTC and STC No. 28, and TEX. HEALTH & SAFETY CODE § 382.085(b)].

3. Failed to submit an initial notification for a reportable emissions event no later than 24 hours after the discovery of an emissions event [30 TEX. ADMIN. CODE §§ 101.201(a)(1)(B) and 122.143(4), FOP No. O1904, GTC and STC No. 2.F, and TEX. HEALTH & SAFETY CODE § 382.085(b)].

4. Failed to prevent unauthorized emissions. Since the Respondent did not comply with the emissions event reporting requirements, the Respondent is precluded from asserting an affirmative defense under 30 TEX. ADMIN. CODE § 101.222 [30 TEX. ADMIN. CODE §§ 101.20(3), 116.115(c), and 122.143(4), NSR Permit Nos. 7186, PSDTX1079M2, and GHGPSDTX145M1, SC No. 1, FOP No. O1904, GTC and STC No. 28, and TEX. HEALTH & SAFETY CODE § 382.085(b)].

## **Corrective Actions/Technical Requirements**

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

The Respondent implemented the following corrective measures:

a. On November 26, 2019, submitted the initial notification for Incident No. 325563;

b. On September 17, 2020, submitted the initial notification for Incident No. 342433;

c. By December 31, 2020, replaced the valve solenoid and the No. 4 Converter Rupture Discs, conducted a function test of the valve and sail switches, verified the high alarm on the No. 4 Converter Mixer inlet pressure, checked the Interlock Check Procedure,

## Executive Summary – Enforcement Matter – Case No. 60259 INV Performance Surfaces, LLC RN102663671 Docket No. 2021-0086-AIR-E

updated the work order to automatically reserve solenoid components, and set reminders for the change out of all the converter automatics in order to prevent the recurrence of emissions events due to the same or similar causes as Incident No. 342433; and

d. By February 3, 2021, conducted training in order to ensure that the initial notifications for reportable emissions events are submitted in a timely manner.

## **Technical Requirements:**

The Order will require the Respondent to:

a. Within 30 days, implement measures and/or procedures designed to prevent the recurrence of emissions events due to the same or similar causes as Incident No. 325563; and

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

## **Contact Information**

TCEQ Attorney: N/A
TCEQ Enforcement Coordinator: Yuliya Dunaway, Enforcement Division, Enforcement Team 4, MC R-13, (210) 403-4077; Michael Parrish, Enforcement Division, MC 219, (512) 239-2548
Respondent: Vincent Salvador, Plant Manager, INV Performance Surfaces, LLC, P.O. Box 2626, Victoria, Texas 77905
Jason Leigh, Technical Manager, INV Performance Surfaces, LLC, P.O. Box 2626, Victoria, Texas 77905
Respondent's Attorney: N/A

S COMMISSION	Policy F	Pe Revision 4 (April 2014)	-	alculatio	n Worksl	heet (PC	2	Revision Marcl	h 26, 2014
DATES	Assigned		• ·	44.1 2024			1		
	PCW			11-Jan-2021	EPA Due				
RESPO		TY INFORMATI		<u> </u>					1
Reg	g. Ent. Ref. No.	RN102663671	e Surfaces, LL						
Facili	ty/Site Region	14-Corpus Christ	ti		Major/I	Minor Source	Major		
CASE I	NFORMATION								
En	f./Case ID No.	60259 2021-0086-AIR-	c		No.	of Violations			
Med	lia Program(s)		<u> </u>		Governmen	Order Type t/Non-Profit			+
	Multi-Media					Coordinator	Yuliya Dunawa		
Adr	min. Penalty \$	Limit Minimum	\$0	Maximum	\$25,000	EC's Team	Enforcement	leam 4	<u> </u>
			Penalt	y Calcula	tion Secti	on			
ΤΟΤΑ	L BASE PENA	LTY (Sum of	violation	base penal	ties)		Subtotal 1		\$4,000
ADJUS	STMENTS (+	/-) TO SUBTO	OTAL 1						
	Subtotals 2-7 are of Compliance Hi	story	the Total Base F	enalty (Subtotal 1 100.0%	) by the indicated p Adjustment	percentage.	tals 2, 3, & 7	<b></b>	\$4,000
	compliance m	-	for four NOVs		nilar violations,				<i><i><b>4</b>17</i><b>000</b></i>
	Notes	with dissimilar v	violations, and	d five orders co	ntaining a deni	al of liability.			
	Notes	Reduction fo	-	es of intent to o sures of violat	conduct an audi	t and five			
			uisciu		10115.				
	Culpability	No		0.0%	Enhancement		Subtotal 4		\$0
	Notes	The Re	spondent doe	s not meet the	culpability crit	eria.			
	Good Faith Eff	ort to Comply T	otal Adjustn	nents			Subtotal 5		-\$25
		<b>a</b> .							
	Economic Ben	Total EB Amounts	\$1,146		Enhancement* d at the Total EB \$	Amount	Subtotal 6		\$0
	Estimated	I Cost of Compliance	\$11,750						
SUM (	OF SUBTOTA	LS 1-7				F	inal Subtotal		\$7,975
OTHE	R FACTORS	AS JUSTICE M	IAY REQUI	RE	0.0%		Adjustment		\$0
		Subtotal by the indic			L		1		-
	Notes								
						Final Per	alty Amount	<b></b>	\$7,975
						i mai i ci	anty Amount		<i>41,313</i>
STATU	JTORY LIMI		IT			Final Asse	ssed Penalty		\$7,975
DEFER	RRAL				0.0%	Reduction	Adjustment		\$0
Reduces t	he Final Assessed Pe	enalty by the indicated	l percentage.						
	Notes	No c	leferral is reco	ommended for	Findings Order	s.			
PAYA	BLE PENALT	Y							\$7,975

		Final Adjustment Percenta	age *capped a	at 100%	100%
>> Fina	al Compliance	Total Compliance History Adjustment Percentage (S History Adjustment			108%
	History Notes	and five orders containing a denial of liability. Reduction for eight notices of inten audit and five disclosures of violations.	t to conduct an	2 0 71	100%
>> CO	mpliance Histo	Enhancement for four NOVs with same/similar violations, three NOVs with dissim			
	Satisfactory F		centage (Sub	total 7)	0%
>> Co		ory Person Classification (Subtotal 7)		-	
	No	Adjustment Per	centage (Sub	total 3)	0%
>> Re	peat Violator	(Subtotal 3)			
		Adjustment Per	centage (Sub	total 2)	108%
		Early compliance with, or offer of a product that meets future state or federal government environmental requirements	No	0%	
	Other	Participation in a voluntary pollution reduction program	No	0%	
		Voluntary on-site compliance assessments conducted by the executive director under a special assistance program	No	0%	
		Environmental management systems in place for one year or more	No	0%	
	Audits	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> )	5	-10%	
	Audits	Letters notifying the executive director of an intended audit conducted under the Texas Environmental, Health, and Safety Audit Privilege Act, 74th Legislature, 1995 (number of audits for which notices were submitted)	8	-8%	
	Emissions	Chronic excessive emissions events ( <i>number of events</i> )	0	0%	
	Convictions	Any criminal convictions of this state or the federal government ( <i>number of counts</i> )	0	0%	
	and Consent Decrees	Any adjudicated final court judgments and default judgments, or non-adjudicated final court judgments or consent decrees without a denial of liability, of this state or the federal government	0	0%	
	Judgments	Any non-adjudicated final court judgments or consent decrees containing a denial of liability of this state or the federal government ( <i>number of judgments or consent decrees meeting criteria</i> )	0	0%	
	Orders	Any adjudicated final enforcement orders, agreed final enforcement orders without a denial of liability, or default orders of this state or the federal government, or any final prohibitory emergency orders issued by the commission	0	0%	
		Any agreed final enforcement orders containing a denial of liability (number of orders meeting criteria)	5	100%	
	1000	Other written NOVs	3	6%	
	NOVs	the current enforcement action (number of NOVs meeting criteria)	4	20%	

### Respondent INV Performance Surfaces, LLC **Case ID No.** 60259 Reg. Ent. Reference No. RN102663671 Media Air

Enf. Coordinator Yuliya Dunaway

Component Number of...

>>

Screening Date 11-Jan-2021

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

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

**Docket No.** 2021-0086-AIR-E

Policy Revision 4 (April 2014) PCW Revision March 26, 2014

Adjust.

20%

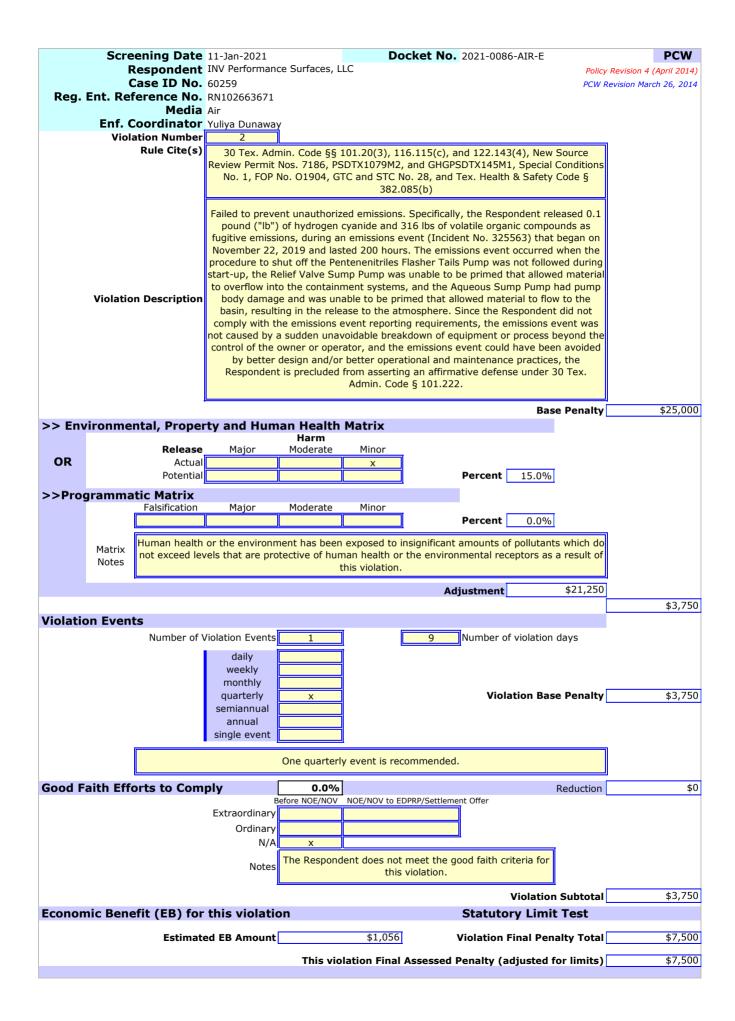
Number

4

**PCW** 

		ening Date			cket No. 2021-0086-AIR-E		PCW
		lespondent Case ID No.	INV Performance Surface	es, LLC			Revision 4 (April 2014)
Rea.		erence No.				PCWR	Revision March 26, 2014
		Media	Air				
			Yuliya Dunaway				
	VIOI	ation Number	1 30 Tax Admin Code	<u>55 101 201(a)(1</u>	)(B) and 122.143(4), Federal Op	orating	
		Rule Cite(s)	Permit ("FOP") No. Of	1904, General Te	rms and Conditions ("GTC") and	Special	
			Terms and Condition		2.F, and Tex. Health & Safety Co 085(b)	de §	
					a reportable emissions event no nissions event. Specifically, the		
	Violatio	n Description	notification for Incident	No. 325563 was	due by November 23, 2019 at 5		
			but was not s	submitted until No	ovember 26, 2019 at 3:11 a.m.		
					Bas	e Penalty	\$25,000
>> Env	vironme	ntal. Proper	ty and Human Hea	Ith Matrix			
		Release	Harn	ı			
OR		Actual	Major Modera	ite Minor	1		
		Potential			Percent 0.0%		
>>Pro	gramma	tic Matrix					
		Falsification	Major Modera				
				X	Percent 1.0%		
	Matrix						
	Notes		Less than 30% of	the rule requirer	nents were not met.		
					Adjustment	\$24,750	
							\$250
Violati	on Event	ts					
		Number of \	/iolation Events 1		3 Number of violation	days	
			daily				
			weekly monthly				
			quarterly		Violation Bas	e Penalty	\$250
			semiannual annual				
			single event x				
							1
			One sin	gle event is reco	mmended.		
Good F	aith Effo	orts to Com	ply 10.	0%		Reduction	\$25
			Before NOE/	NOV NOE/NOV to E	DPRP/Settlement Offer		
			Ordinary	X			
			N/A				
					ed compliance by February 3, Enforcement dated December		
					5, 2020.		
					Violation	Subtotal	\$225
Econor	nic Bene	efit (EB) for	this violation		Statutory Limit	: Test	
		Estimate	ed EB Amount	\$90	Violation Final Pen	alty Total	\$475
			This	violation Final	Assessed Penalty (adjusted f		
			1113		is source i charty (aujusteu i		77-پ

	E C	conomic	Benefit	Wo	r <b>ksheet</b>		
Respondent	INV Performar	nce Surfaces, LLC					
Case ID No.							
Reg. Ent. Reference No.	RN102663671						
Media							Years of
Violation No.	1					Percent Interest	Depreciation
						5.0	15
	Item Cost	Date Required	Final Date	Yrs	Interest Saved	Costs Saved	EB Amount
Item Description							
Item Description							
Delayed Costs	•						
Equipment			[	0.00	\$0	\$0	\$0
Buildings				0.00	\$0	\$0	\$0
Other (as needed)				0.00	\$0	\$0	\$0
Engineering/Construction				0.00	\$0	\$0	\$0
Land				0.00	\$0	n/a	\$0
Record Keeping System	\$1,500	23-Nov-2019	3-Feb-2021	1.20	\$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)	\$250	23-Nov-2019	26-Nov-2019	0.01	\$0	n/a	\$0
			initial notificatio	n for In	cident No. 325563	8 (\$250) and to cond	luct training in
Notes for DELAYED costs	order to er	nsure that the init 500). The Dates F	initial notificatio ial notifications Required are the	n for In for repo date tl	cident No. 325563 ortable emissions e ne initial notificatio		luct training in I in a timely
Notes for DELAYED costs	order to er manner (\$1,5	nsure that the init i00). The Dates F the date the ir	initial notificatio ial notifications Required are the iitial notification	n for In for repo date th was su	cident No. 325563 ortable emissions e ne initial notificatio bmitted and the d	(\$250) and to cond events are submitted on was due and the	luct training in 1 in a timely Final Dates are
	order to er manner (\$1,5	nsure that the init i00). The Dates F the date the ir	initial notificatio ial notifications Required are the iitial notification	n for In for repo date th was su	cident No. 325563 ortable emissions e ne initial notificatio bmitted and the d	(\$250) and to concepts are submitted on was due and the ate of compliance.	luct training in 1 in a timely Final Dates are
Avoided Costs	order to er manner (\$1,5	nsure that the init i00). The Dates F the date the ir	initial notificatio ial notifications Required are the iitial notification	n for In for repo date tl was su tering	cident No. 325563 ortable emissions e ne initial notificatio bmitted and the d item (except for	(\$250) and to conceptents are submitted on was due and the ate of compliance.	duct training in d in a timely Final Dates are <b>d costs)</b>
Avoided Costs Disposal Personnel	order to er manner (\$1,5	nsure that the init i00). The Dates F the date the ir	initial notificatio ial notifications Required are the iitial notification	n for In for repo date th was su tering 0.00	cident No. 325563 ortable emissions e ne initial notificatio bmitted and the d item (except for \$0	3 (\$250) and to conceptents are submitted on was due and the ate of compliance. r one-time avoided \$0	duct training in d in a timely Final Dates are d costs) \$0
Avoided Costs Disposal Personnel	order to er manner (\$1,5	nsure that the init i00). The Dates F the date the ir	initial notificatio ial notifications Required are the iitial notification	n for In for repo date th was su tering 0.00 0.00	cident No. 325563 prtable emissions ene initial notification bmitted and the d item (except for \$0 \$0	(\$250) and to concern events are submitted on was due and the ate of compliance.	duct training in d in a timely Final Dates are d costs) \$0 \$0
Avoided Costs Disposal Personnel Inspection/Reporting/Sampling	order to er manner (\$1,5	nsure that the init i00). The Dates F the date the ir	initial notificatio ial notifications Required are the iitial notification	n for In for repo date th was su tering 0.00 0.00 0.00	cident No. 325563 prtable emissions ender initial notification bmitted and the d item (except for \$0 \$0 \$0	(\$250) and to conceptents are submitted on was due and the ate of compliance. r one-time avoided \$0 \$0 \$0	duct training in d in a timely Final Dates are <b>d costs)</b> \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0
Avoided Costs Disposal Personnel Inspection/Reporting/Sampling Supplies/Equipment	order to er manner (\$1,5	nsure that the init i00). The Dates F the date the ir	initial notificatio ial notifications Required are the iitial notification	n for In for repo date ti was su <b>itering</b> 0.00 0.00 0.00 0.00 0.00 0.00	cident No. 325563 prtable emissions ene initial notification bmitted and the d item (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	(\$250) and to conceptents are submitted on was due and the ate of compliance. r one-time avoided \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	duct training in d in a timely Final Dates are \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0
Avoided Costs Disposal Personnel Inspection/Reporting/Sampling Supplies/Equipment Financial Assurance	order to er manner (\$1,5	nsure that the init i00). The Dates F the date the ir	initial notificatio ial notifications Required are the iitial notification	n for In for repo date ti was su <b>tering</b> 0.00 0.00 0.00 0.00	cident No. 325563 prtable emissions entrial notification bmitted and the d item (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	(\$250) and to conceptents are submitted on was due and the ate of compliance. r <b>one-time avoide</b> \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	duct training in d in a timely Final Dates are <b>d costs)</b> \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0
Avoided Costs Disposal Personnel Inspection/Reporting/Sampling Supplies/Equipment Financial Assurance ONE-TIME avoided costs	order to er manner (\$1,5	nsure that the init i00). The Dates F the date the ir	initial notificatio ial notifications Required are the iitial notification	n for In for repo date ti was su <b>itering</b> 0.00 0.00 0.00 0.00 0.00 0.00	cident No. 325563 prtable emissions ene initial notification bmitted and the d item (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	(\$250) and to conceptents are submitted on was due and the ate of compliance. r one-time avoided \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	duct training in d in a timely Final Dates are <b>(d costs)</b> \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0



		conomic	Benefit	Wo	rksheet		
Respondent	INV Performan	nce Surfaces, LLC					
Case ID No.	60259						
Reg. Ent. Reference No.	RN102663671						
Media Violation No.	Air					Percent Interest	Years of Depreciation
						5.0	15
	Item Cost	<b>Date Required</b>	Final Date	Yrs	Interest Saved	Costs Saved	EB Amount
Item Description							
Delayed Costs							
Equipment				0.00	\$0	\$0	\$0
Buildings				0.00	\$0	\$0	\$0
Other (as needed)				0.00	\$0	\$0	\$0
Engineering/Construction				0.00	\$0	\$0	\$0
Land				0.00	\$0	n/a	\$0
Record Keeping System				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
Permit Costs Other (as needed)	\$10,000	22-Nov-2019	1-Jan-2022	2.11	\$1,056	n/a	\$1,056
	Estimated cos events due	t to implement m to the same or s emissions event	easures and/or imilar causes as began and the I	procedu s Incider	\$1,056 ures designed to p nt No. 325563. Th te is the estimated	n/a revent the recurren ne Date Required is I date of compliance	\$1,056 ce of emissions the date the
Other (as needed)	Estimated cos events due	t to implement m to the same or s emissions event	easures and/or imilar causes as began and the I	2.11 procedu Incider inal Dat	\$1,056 ures designed to p nt No. 325563. Th te is the estimated <b>item (except fo</b>	n/a revent the recurren ne Date Required is I date of compliance r <b>one-time avoide</b>	\$1,056 ce of emissions the date the e. d costs)
Other (as needed) Notes for DELAYED costs	Estimated cos events due	t to implement m to the same or s emissions event	easures and/or imilar causes as began and the I	2.11 procedu Incider inal Dat tering 0.00	\$1,056 ures designed to p nt No. 325563. TH te is the estimated item (except for \$0	n/a revent the recurren ne Date Required is I date of compliance one-time avoide \$0	\$1,056 ce of emissions the date the e. d costs) \$0
Other (as needed) Notes for DELAYED costs Avoided Costs Disposal Personnel	Estimated cos events due	t to implement m to the same or s emissions event	easures and/or imilar causes as began and the I	2.11 procedu incider inal Dat inal Dat inal Dat 0.00 0.00	\$1,056 ares designed to p th No. 325563. The te is the estimated item (except for \$0 \$0 \$0	n/a revent the recurren the Date Required is a date of compliance r one-time avoide \$0 \$0	\$1,056 ce of emissions the date the c. d costs) \$0 \$0
Other (as needed) Notes for DELAYED costs <b>Avoided Costs</b> Disposal Personnel Inspection/Reporting/Sampling	Estimated cos events due	t to implement m to the same or s emissions event	easures and/or imilar causes as began and the I	2.11 procedu incider inal Dat tering 0.00 0.00	\$1,056 ures designed to p tt No. 325563. Th te is the estimated item (except for \$0 \$0 \$0	n/a revent the recurren he Date Required is date of compliance r one-time avoide \$0 \$0 \$0	\$1,056 ce of emissions the date the  d costs) \$0 \$0 \$0
Other (as needed) Notes for DELAYED costs <b>Avoided Costs</b> Disposal Personnel Inspection/Reporting/Sampling Supplies/Equipment	Estimated cos events due	t to implement m to the same or s emissions event	easures and/or imilar causes as began and the I	2.11 procedu inal Dat inal Dat 0.00 0.00 0.00 0.00	\$1,056 ures designed to p nt No. 325563. Th te is the estimated item (except for \$0 \$0 \$0 \$0 \$0	n/a revent the recurren te Date Required is date of compliance r one-time avoide \$0 \$0 \$0 \$0 \$0 \$0	\$1,056 ce of emissions the date the d costs) \$0 \$0 \$0 \$0 \$0
Other (as needed) Notes for DELAYED costs <b>Avoided Costs</b> Disposal Personnel Inspection/Reporting/Sampling Supplies/Equipment Financial Assurance	Estimated cos events due	t to implement m to the same or s emissions event	easures and/or imilar causes as began and the I	2.11 procedu inal Dat inal Dat 0.00 0.00 0.00 0.00 0.00	\$1,056 ures designed to p nt No. 325563. Th te is the estimated item (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0	n/a revent the recurren te Date Required is date of compliance r one-time avoide \$0 \$0 \$0 \$0 \$0 \$0 \$0	\$1,056 ce of emissions the date the e. d costs) \$0 \$0 \$0 \$0 \$0 \$0 \$0
Other (as needed) Notes for DELAYED costs <b>Avoided Costs</b> Disposal Personnel Inspection/Reporting/Sampling Supplies/Equipment Financial Assurance ONE-TIME avoided costs	Estimated cos events due	t to implement m to the same or s emissions event	easures and/or imilar causes as began and the I	2.11 procedu inal Dat inal Data inal	\$1,056 ures designed to p nt No. 325563. Th te is the estimated item (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	n/a revent the recurren the Date Required is to date of compliance r one-time avoide \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	\$1,056 ce of emissions the date the e. d costs) \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0
Other (as needed) Notes for DELAYED costs <b>Avoided Costs</b> Disposal Personnel Inspection/Reporting/Sampling Supplies/Equipment Financial Assurance	Estimated cos events due	t to implement m to the same or s emissions event	easures and/or imilar causes as began and the I	2.11 procedu inal Dat inal Dat 0.00 0.00 0.00 0.00 0.00	\$1,056 ures designed to p nt No. 325563. Th te is the estimated item (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0	n/a revent the recurren te Date Required is date of compliance r one-time avoide \$0 \$0 \$0 \$0 \$0 \$0 \$0	\$1,056 ce of emissions the date the e. d costs) \$0 \$0 \$0 \$0 \$0 \$0 \$0
Other (as needed) Notes for DELAYED costs <b>Avoided Costs</b> Disposal Personnel Inspection/Reporting/Sampling Supplies/Equipment Financial Assurance ONE-TIME avoided costs	Estimated cos events due	t to implement m to the same or s emissions event	easures and/or imilar causes as began and the I	2.11 procedu inal Dat inal Data inal	\$1,056 ures designed to p nt No. 325563. Th te is the estimated item (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	n/a revent the recurren the Date Required is to date of compliance r one-time avoide \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	\$1,056 ce of emissions the date the e. d costs) \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0

COMMISSION COMUNICA COMUN	Policy R	Pe Revision 4 (April 2014)	nalty C	Calculatio	n Worksl	neet (PC		Revision Marcl	h 26, 2014
DATES	Assigned		<u>.</u>				1		
	PCW	, ,		25-Jan-2021	EPA Due				
RESPO		TY INFORMATIC INV Performance							1
	g. Ent. Ref. No.	RN102663671		EC					
Facilit	ty/Site Region	14-Corpus Christ			Major/N	inor Source	Major		
	NFORMATION	60250							т
En	f./Case ID No. Docket No.	60259 2021-0086-AIR-E			NO. O	of Violations Order Type			+
Med	lia Program(s)	Air				t/Non-Profit			1
	Multi-Media				Enf.		Yuliya Dunawa Enforcement		+
Adn	nin. Penalty \$ I	Limit Minimum	\$0	Maximum	\$25,000				
			Pena	ty Calcula	tion Section	on			
ΤΟΤΑΙ	L BASE PENA	LTY (Sum of		,		••••	Subtotal 1		\$7,750
ADJUS	STMENTS (+	/-) TO SUBTO	TAL 1						
		btained by multiplying					tals 2, 3, & 7	·	\$7,750
	compliance m	Enhancement for	four NOVs	100.0%	Adjustment				\$7,750
	Notes	dissimilar viol	ations, and	five orders cont	aining a denial	of liability.			
	Notes	Reduction fo		es of intent to co losures of violati		and four			
			uise		0113.		ļ		
	Culpability	No		0.0%	Enhancement		Subtotal 4		\$0
	Notes	The Res	spondent do	es not meet the	culpability crite	eria.			
							]		
	Good Faith Eff	ort to Comply To	otal Adjust	ments			Subtotal 5		-\$1,900
	Economic Ben	Total EB Amounts	\$264		Enhancement* d at the Total EB \$	Amount	Subtotal 6		\$0
	Estimated	Cost of Compliance	\$36,750	]					
SUM C	OF SUBTOTA	LS 1-7				F	inal Subtotal		\$13,600
OTHE	D EACTODS /	AS JUSTICE M		TDF	0.0%		Adjustment		\$0
		Subtotal by the indica			0.0 /0		Aujustinent		ΨŪ
	Notes								
	Hotes								
						Final Per	alty Amount		\$13,600
STATU	JTORY LIMIT	<b>FADJUSTMEN</b>	т			Final Asse	ssed Penalty		\$13,600
DEFEF	RAI				0.0%	Reduction	Adjustment	<b></b>	\$0
		nalty by the indicated	percentage.		0.0 /0			ļ	÷
	Notes	No d	eferral is re	commended for	Findings Orders	s.			
DAY							1	r	
PAYA	BLE PENALT	Y							\$13,600

	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> )	4	20%	
		Other written NOVs	2	4%	
		Any agreed final enforcement orders containing a denial of liability ( <i>number of orders meeting criteria</i> )	5	100%	
	Orders	Any adjudicated final enforcement orders, agreed final enforcement orders without a denial of liability, or default orders of this state or the federal government, or any final prohibitory emergency orders issued by the commission	0	0%	
	Judgments and Consent	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%	
	Decrees	Any adjudicated final court judgments and default judgments, or non-adjudicated final court judgments or consent decrees without a denial of liability, of this state or the federal government	0	0%	
	Convictions	Any criminal convictions of this state or the federal government ( <i>number of counts</i> )	0	0%	
	Emissions	Chronic excessive emissions events (number of events)	0	0%	
	Audits	Letters notifying the executive director of an intended audit conducted under the Texas Environmental, Health, and Safety Audit Privilege Act, 74th Legislature, 1995 (number of audits for which notices were submitted)	9	-9%	
	Addits	Disclosures of violations under the Texas Environmental, Health, and Safety Audit Privilege Act, 74th Legislature, 1995 ( <i>number of audits for which violations were disclosed</i> )	4	-8%	
		Environmental management systems in place for one year or more	No	0%	
	Other	Voluntary on-site compliance assessments conducted by the executive director under a special assistance program	No	0%	1
		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%	1
		Adjustment Per	centage (Sub	total 2)	107%
>> Re	epeat Violator	(Subtotal 3)			
	No	Adjustment Per	centage (Sub	total 3)	0%
>> Co	mpliance Hist	ory Person Classification (Subtotal 7)			
	Satisfactory I	Performer Adjustment Per	centage (Sub	total 7)	0%
>> Co	mpliance Hist	ory Summary			
	Compliance History Notes	Enhancement for four NOVs with same/similar violations, two NOVs with dissimilar five orders containing a denial of liability. Reduction for nine notices of intent to c and four disclosures of violations.			
>> Fin	al Compliance	Total Compliance History Adjustment Percentage (S History Adjustment	Subtotals 2,	3, & 7)	107%
		Final Adjustment Percent	age *capped a	at 100%	100%

### Screening Date 25-Jan-2021 Respondent INV Performance Surfaces, LLC Case ID No. 60259 Reg. Ent. Reference No. RN102663671

Media Air

Enf. Coordinator Yuliya Dunaway

Component Number of...

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

PCW Revision March 26, 2014

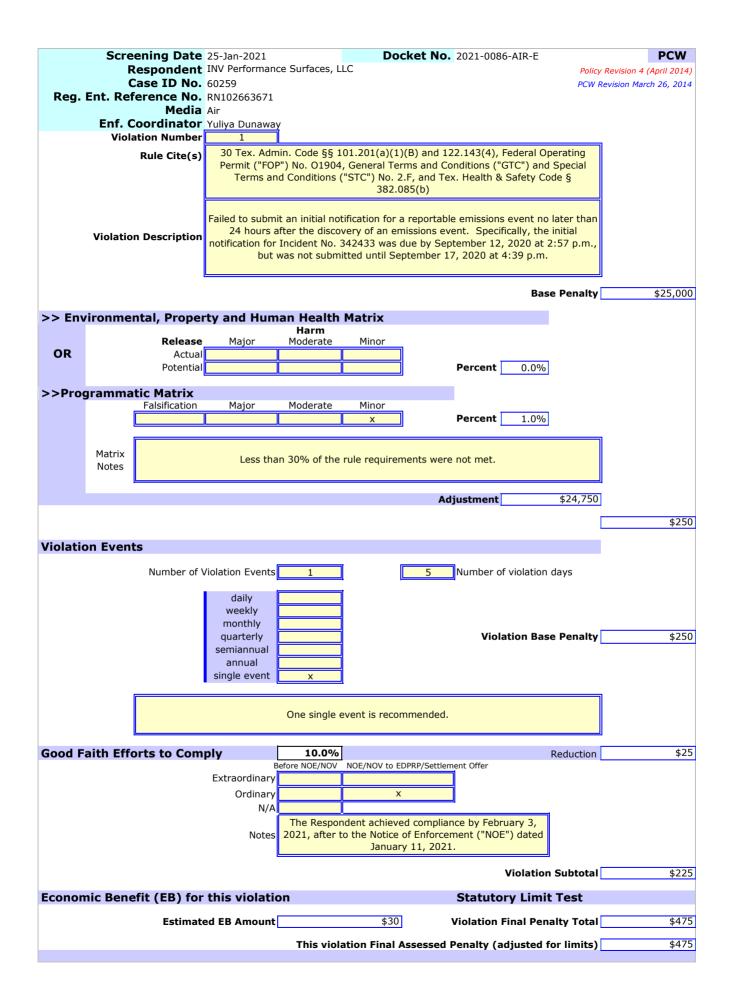
Adjust.



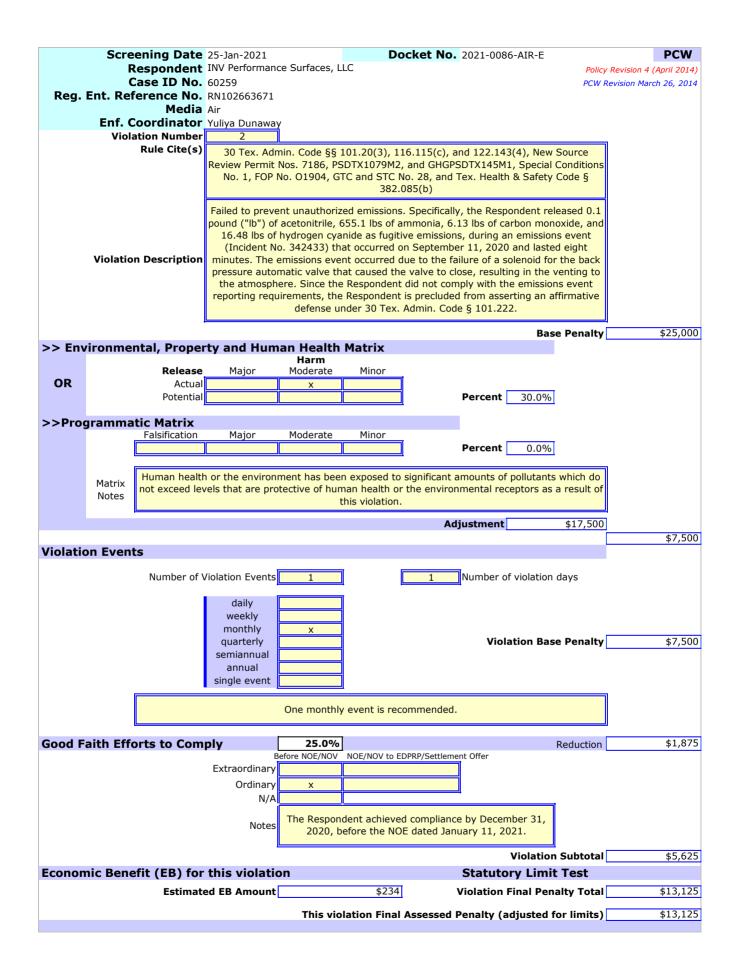
Number

Policy Revision 4 (April 2014)

PCW



		conomic	Benefit	IOW	rksneet		
Respondent	INV Performar	nce Surfaces, LLC					
Case ID No.	60259						
Reg. Ent. Reference No.	RN102663671						
Media							Years of
Violation No.	1					Percent Interest	Depreciation
	-					5.0	1
	Item Cost	Date Required	Final Date	Vrc	Interest Saved	Costs Saved	EB Amount
Item Description		bute Required	That Date		Interest Savea	costs suvcu	ED Amount
Item Description							
Delayed Costs	. <u></u>	1	1		1.0		
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	10.0 0000		0.00	\$0	n/a	\$0
Training/Sampling	\$1,500	12-Sep-2020	3-Feb-2021	0.39	\$30	n/a	\$30
				0.00	\$0	n/a	\$0
Remediation/Disposal							
Permit Costs	+250		17.0.0000	0.00	\$0	n/a	\$0
· · ·			initial notificatio	0.00 0.01	\$0 \$0 cident No. 342433	n/a n/a 8 (\$250) and to con	\$0 \$0 duct training in
Permit Costs	Estimated co order to er manner (\$1,5	sts to submit the nsure that the init 500). The Dates F the date the ir	initial notificationial notifications Required are the nitial notification	0.00 0.01 for Ind for repo e date th was sul	\$0 \$0 cident No. 342433 rtable emissions e ne initial notificatio bmitted and the d	n/a n/a (\$250) and to con events are submitte on was due and the ate of compliance.	\$0 \$0 duct training in d in a timely Final Dates are
Permit Costs Other (as needed)	Estimated co order to er manner (\$1,5	sts to submit the nsure that the init 500). The Dates F the date the ir	initial notificationial notifications Required are the nitial notification	0.00 0.01 on for Ind for repo e date th was sub	\$0 \$0 cident No. 342433 rtable emissions e ne initial notificatio bmitted and the d	n/a n/a (\$250) and to con events are submitte on was due and the	\$0 \$0 duct training in d in a timely Final Dates are
Permit Costs Other (as needed) Notes for DELAYED costs <b>Avoided Costs</b> Disposal	Estimated co order to er manner (\$1,5	sts to submit the nsure that the init 500). The Dates F the date the ir	initial notificationial notifications Required are the nitial notification	0.00 0.01 for repo e date th was sul	\$0 \$0 cident No. 342433 rtable emissions e he initial notificatio bmitted and the d item (except for \$0	n/a n/a (\$250) and to con events are submitte on was due and the ate of compliance. r one-time avoide \$0	\$0 \$0 duct training in d in a timely Final Dates are <b>d costs)</b> \$0
Permit Costs Other (as needed) Notes for DELAYED costs <b>Avoided Costs</b> Disposal Personnel	Estimated co order to er manner (\$1,5	sts to submit the nsure that the init 500). The Dates F the date the ir	initial notificationial notifications Required are the nitial notification	0.00 0.01 0 for Inc for repo e date th was sub ntering 0.00 0.00	\$0 \$0 cident No. 342433 rtable emissions e ne initial notification bmitted and the d item (except for \$0 \$0 \$0	n/a n/a (\$250) and to con- events are submitte on was due and the ate of compliance. r <b>one-time avoide</b> \$0 \$0	\$0 \$0 duct training in d in a timely Final Dates are d costs) \$0 \$0
Permit Costs Other (as needed) Notes for DELAYED costs <b>Avoided Costs</b> Disposal Personnel	Estimated co order to er manner (\$1,5	sts to submit the nsure that the init 500). The Dates F the date the ir	initial notificationial notifications Required are the nitial notification	0.00 0.01 0.01 for repo e date th was sub tering 0.00 0.00	\$0 \$0 cident No. 342433 rtable emissions end initial notification bmitted and the d item (except for \$0 \$0 \$0 \$0 \$0	n/a n/a (\$250) and to con events are submitte in was due and the ate of compliance. r one-time avoide \$0 \$0 \$0	\$0 \$0 duct training in d in a timely Final Dates are d costs) \$0 \$0 \$0 \$0
Permit Costs Other (as needed) Notes for DELAYED costs <b>Avoided Costs</b> Disposal Personnel nspection/Reporting/Sampling Supplies/Equipment	Estimated co order to er manner (\$1,5	sts to submit the nsure that the init 500). The Dates F the date the ir	initial notificationial notifications Required are the nitial notification	0.00 0.01 for repo e date th was sul <b>tering</b> 0.00 0.00 0.00	\$0 \$0 cident No. 342433 rtable emissions e the initial notification britted and the d <b>item (except for</b> \$0 \$0 \$0 \$0 \$0	n/a n/a (\$250) and to con events are submitte in was due and the ate of compliance. r one-time avoide \$0 \$0 \$0 \$0 \$0	\$0 \$0 duct training in d in a timely Final Dates are d costs) \$0 \$0 \$0 \$0 \$0 \$0
Permit Costs Other (as needed) Notes for DELAYED costs <b>Avoided Costs</b> Disposal Personnel Inspection/Reporting/Sampling Supplies/Equipment Financial Assurance	Estimated co order to er manner (\$1,5	sts to submit the nsure that the init 500). The Dates F the date the ir	initial notificationial notifications Required are the nitial notification	0.00 0.01 0.01 for repo e date tr was sub tering 0.00 0.00 0.00 0.00	\$0 \$0 cident No. 342433 rtable emissions e trable emissions e e initial notification bmitted and the d item (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	n/a n/a (\$250) and to con events are submitte on was due and the ate of compliance. r <b>one-time avoide</b> \$0 \$0 \$0 \$0 \$0 \$0	\$0 \$0 duct training in d in a timely Final Dates are <b>d costs)</b> \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0
Permit Costs Other (as needed) Notes for DELAYED costs <b>Avoided Costs</b> Disposal Personnel nspection/Reporting/Sampling Supplies/Equipment Financial Assurance ONE-TIME avoided costs	Estimated co order to er manner (\$1,5	sts to submit the nsure that the init 500). The Dates F the date the ir	initial notificationial notifications Required are the nitial notification	0.00 0.01 0.01 for repo e date th was sub tering 0.00 0.00 0.00 0.00 0.00	\$0 \$0 cident No. 342433 rtable emissions en initial notification bmitted and the d item (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	n/a n/a (\$250) and to con events are submitte on was due and the ate of compliance. r <b>one-time avoide</b> \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	\$0 \$0 duct training in d in a timely Final Dates are d costs) \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0
Permit Costs Other (as needed) Notes for DELAYED costs Disposal Personnel nspection/Reporting/Sampling Supplies/Equipment Financial Assurance	Estimated co order to er manner (\$1,5	sts to submit the nsure that the init 500). The Dates F the date the ir	initial notificationial notifications Required are the nitial notification	0.00 0.01 0.01 for repo e date tr was sub tering 0.00 0.00 0.00 0.00	\$0 \$0 cident No. 342433 rtable emissions e trable emissions e e initial notification bmitted and the d item (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	n/a n/a (\$250) and to con events are submitte on was due and the ate of compliance. r <b>one-time avoide</b> \$0 \$0 \$0 \$0 \$0 \$0	\$0 \$0 duct training in d in a timely Final Dates are d costs) \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0
Permit Costs Other (as needed) Notes for DELAYED costs <b>Avoided Costs</b> Disposal Personnel nspection/Reporting/Sampling Supplies/Equipment Financial Assurance ONE-TIME avoided costs	Estimated co order to er manner (\$1,5	sts to submit the nsure that the init 500). The Dates F the date the ir	initial notificationial notifications Required are the nitial notification	0.00 0.01 0.01 for repo e date th was sub tering 0.00 0.00 0.00 0.00 0.00	\$0 \$0 cident No. 342433 rtable emissions en initial notification bmitted and the d item (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	n/a n/a (\$250) and to con events are submitte on was due and the ate of compliance. r <b>one-time avoide</b> \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	\$0 \$0 duct training in d in a timely Final Dates are d costs) \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0



	E	conomic	Benefit	Wo	rksheet		
Respondent Case ID No. Reg. Ent. Reference No.	60259	nce Surfaces, LLC					
Media Violation No.						Percent Interest	Years of Depreciation
						5.0	15
		Date Required	Final Date	Yrs	Interest Saved	Costs Saved	EB Amount
Item Description							
Delayed Costs							
Delayed Costs Equipment	\$25,000	11-Sep-2020	28-Sep-2020	0.05	\$4	\$78	\$82
Buildings				0.00	\$0	\$0	\$0
Other (as needed)				0.00	\$0	\$0	\$0
Engineering/Construction				0.00	\$0	\$0	\$0
Land				0.00	\$0	n/a	\$0
Record Keeping System				0.00	\$0	n/a	\$0
Training/Sampling				0.00	\$0	n/a	\$0
Remediation/Disposal				0.00	\$0	n/a	\$0
Permit Costs Other (as needed)	\$10,000	11-Sep-2020	31-Dec-2020	0.00	<u>\$0</u> \$152	n/a n/a	<u>\$0</u> \$152
Notes for DELAYED costs	solenoid com order to pre	ponents, and set	reminders for the reminders for the reminders for the remissions are the date the remissions are the reminder	he char events	nge out of all the c due to the same ons event occurred	< order to automatic onverter automatics or similar causes as and the Final Dates	s (\$10,000) in Incident No.
Avoided Costs		NITZE avoided c	osts bafora an	toring	item (except for	r one-time avoide	d costs)
Avoided Costs Disposal	ANNOA		osts before en	0.00	\$0	\$0	\$0
Personnel				0.00	\$0	\$0	\$0
Inspection/Reporting/Sampling				0.00	\$0	\$0	\$0
Supplies/Equipment				0.00	\$0	\$0	\$0
Financial Assurance				0.00	\$0	\$0	\$0
ONE-TIME avoided costs				0.00	\$0	\$0	\$0
				0.00	\$0 \$0	\$0 \$0	\$0 \$0
<b>ONE-TIME</b> avoided costs							



## **Compliance History Report**

Customer, Respondent Owner/Operator:	t, or CN602582231, INV Performance St LLC	urfaces, Classification: SATISFACTORY Rating: 6.15
Regulated Entity:	RN102663671, INV NYLON CHEMIC AMERICAS VICTORIA SITE	CALS Classification: SATISFACTORY Rating: 7.65
Complexity Points:	52	Repeat Violator: NO
CH Group:	05 - Chemical Manufacturing	
ocation:	2695 OLD BLOOMINGTON RD NOR	TH NEAR VICTORIA, VICTORIA COUNTY, TX
CEQ Region:	REGION 14 - CORPUS CHRISTI	
ID Number(s):	C DEDMIT 1967	
AIR OPERATING PERMIT		AIR OPERATING PERMITS PERMIT 1415
AIR OPERATING PERMIT		AIR OPERATING PERMITS PERMIT 1904
	S ACCOUNT NUMBER VCA001A SUPPLY REGISTRATION 2350014	AIR OPERATING PERMITS ACCOUNT NUMBER VC0008Q AIR NEW SOURCE PERMITS PERMIT 809
POBLIC WATER STSTEM/	SUPPLY REGISTRATION 2550014	AIR NEW SOURCE PERMITS FLRMIT 809
AIR NEW SOURCE PERMI	TS PERMIT 810	AIR NEW SOURCE PERMITS PERMIT 812
AIR NEW SOURCE PERMI	TS PERMIT 813	AIR NEW SOURCE PERMITS PERMIT 7186
AIR NEW SOURCE PERMI	TS REGISTRATION 7873	AIR NEW SOURCE PERMITS PERMIT 9560
AIR NEW SOURCE PERMI	TS REGISTRATION 14751	AIR NEW SOURCE PERMITS PERMIT 23271
AIR NEW SOURCE PERMI	TS PERMIT 31376	AIR NEW SOURCE PERMITS REGISTRATION 37067
AIR NEW SOURCE PERMI	TS REGISTRATION 43301	AIR NEW SOURCE PERMITS REGISTRATION 43502
AIR NEW SOURCE PERMI	TS REGISTRATION 43501	AIR NEW SOURCE PERMITS REGISTRATION 44234
AIR NEW SOURCE PERMI	TS REGISTRATION 45256	AIR NEW SOURCE PERMITS REGISTRATION 47610
AIR NEW SOURCE PERMI	TS ACCOUNT NUMBER VC0008Q	AIR NEW SOURCE PERMITS AFS NUM 4846900001
AIR NEW SOURCE PERMI	TS REGISTRATION 71504	AIR NEW SOURCE PERMITS REGISTRATION 71789
AIR NEW SOURCE PERMI	TS REGISTRATION 56688	AIR NEW SOURCE PERMITS REGISTRATION 73896
AIR NEW SOURCE PERMI		AIR NEW SOURCE PERMITS REGISTRATION 73898
AIR NEW SOURCE PERMI		AIR NEW SOURCE PERMITS EPA PERMIT PSDTX1079
AIR NEW SOURCE PERMI		AIR NEW SOURCE PERMITS REGISTRATION 89577
AIR NEW SOURCE PERMI		AIR NEW SOURCE PERMITS REGISTRATION 93064
	TS EPA PERMIT PSDTX1079M1	AIR NEW SOURCE PERMITS REGISTRATION 92217
AIR NEW SOURCE PERMI		AIR NEW SOURCE PERMITS REGISTRATION 92339
AIR NEW SOURCE PERMI		AIR NEW SOURCE PERMITS REGISTRATION 102817
AIR NEW SOURCE PERMI		AIR NEW SOURCE PERMITS REGISTRATION 109746
AIR NEW SOURCE PERMI		AIR NEW SOURCE PERMITS REGISTRATION 103298
AIR NEW SOURCE PERMI		AIR NEW SOURCE PERMITS REGISTRATION 105010
AIR NEW SOURCE PERMI		AIR NEW SOURCE PERMITS REGISTRATION 111679
AIR NEW SOURCE PERMI	TS REGISTRATION 119719 TS EPA PERMIT PSDTX1079M2	AIR NEW SOURCE PERMITS EPA PERMIT GHGPSDTX129 AIR NEW SOURCE PERMITS REGISTRATION 131268
AIR NEW SOURCE PERMI		AIR NEW SOURCE PERMITS REGISTRATION 131208 AIR NEW SOURCE PERMITS REGISTRATION 108018
	TS EPA PERMIT GHGPSDTX145	AIR NEW SOURCE PERMITS REGISTRATION 108018 AIR NEW SOURCE PERMITS REGISTRATION 138475
	TS REGISTRATION 105728	AIR NEW SOURCE PERMITS REGISTRATION 136475 AIR NEW SOURCE PERMITS EPA PERMIT PSDTX1416
	TS REGISTRATION 103728	AIR NEW SOURCE PERMITS LEAPERMIT PSDTATETO AIR NEW SOURCE PERMITS REGISTRATION 115157
	TS REGISTRATION 115101	AIR NEW SOURCE PERMITS REGISTRATION 115157
	TS REGISTRATION 122060	AIR NEW SOURCE PERMITS REGISTRATION 122233
	TS REGISTRATION 122000	AIR NEW SOURCE PERMITS REGISTRATION 122034 AIR NEW SOURCE PERMITS REGISTRATION 106823
	TS EPA PERMIT PSDTX1448	AIR NEW SOURCE PERMITS REGISTRATION 100025 AIR NEW SOURCE PERMITS REGISTRATION 128539
AIR NEW SOURCE PERMI		AIR NEW SOURCE PERMITS REGISTRATION 120000
	TS EPA PERMIT GHGPSDTX13	AIR NEW SOURCE PERMITS REGISTRATION 107110
AIR NEW SOURCE PERMI		AIR NEW SOURCE PERMITS REGISTRATION 107050

AIR NEW SOURCE PERMITS REGISTRATION 153000	AIR NEW SOURCE PERMITS REGISTRATION 151197
AIR NEW SOURCE PERMITS REGISTRATION 154192	AIR NEW SOURCE PERMITS REGISTRATION 151513
AIR NEW SOURCE PERMITS PERMIT AMOC64	AIR NEW SOURCE PERMITS REGISTRATION 150775
AIR NEW SOURCE PERMITS REGISTRATION 150427	AIR NEW SOURCE PERMITS REGISTRATION 162812
AIR NEW SOURCE PERMITS REGISTRATION 162811	AIR NEW SOURCE PERMITS REGISTRATION 162112
AIR NEW SOURCE PERMITS REGISTRATION 162916	AIR NEW SOURCE PERMITS REGISTRATION 161725
AIR NEW SOURCE PERMITS REGISTRATION 162330	AIR NEW SOURCE PERMITS REGISTRATION 163343
AIR NEW SOURCE PERMITS REGISTRATION 163344	AIR NEW SOURCE PERMITS REGISTRATION 163737
AIR NEW SOURCE PERMITS REGISTRATION 163502	AIR NEW SOURCE PERMITS REGISTRATION 162329
AIR NEW SOURCE PERMITS REGISTRATION 163531	AIR NEW SOURCE PERMITS REGISTRATION 163730
AIR NEW SOURCE PERMITS REGISTRATION 163501	AIR NEW SOURCE PERMITS REGISTRATION 163030
AIR NEW SOURCE PERMITS REGISTRATION 163729	AIR NEW SOURCE PERMITS REGISTRATION 162917
AIR NEW SOURCE PERMITS REGISTRATION 148170	AIR NEW SOURCE PERMITS REGISTRATION 144089
AIR NEW SOURCE PERMITS REGISTRATION 147282	AIR NEW SOURCE PERMITS REGISTRATION 146503
AIR NEW SOURCE PERMITS REGISTRATION 147180	AIR NEW SOURCE PERMITS EPA PERMIT GHGPSDTX145M1
AIR NEW SOURCE PERMITS REGISTRATION 146876	AIR NEW SOURCE PERMITS REGISTRATION 150425
AIR NEW SOURCE PERMITS EPA PERMIT GHGPSDTX160	AIR NEW SOURCE PERMITS REGISTRATION 160436
AIR NEW SOURCE PERMITS REGISTRATION 156653	AIR NEW SOURCE PERMITS REGISTRATION 159010
AIR NEW SOURCE PERMITS REGISTRATION 160437	AIR NEW SOURCE PERMITS REGISTRATION 160761
AIR NEW SOURCE PERMITS REGISTRATION 159427	AIR NEW SOURCE PERMITS REGISTRATION 159739
AIR NEW SOURCE PERMITS REGISTRATION 161663	AIR NEW SOURCE PERMITS REGISTRATION 160438
AIR NEW SOURCE PERMITS REGISTRATION 155252	AIR NEW SOURCE PERMITS REGISTRATION 154311
AIR NEW SOURCE PERMITS REGISTRATION 157983	AIR NEW SOURCE PERMITS REGISTRATION 156654
AIR NEW SOURCE PERMITS REGISTRATION 154819	PETROLEUM STORAGE TANK REGISTRATION REGISTRATION 24717
PETROLEUM STORAGE TANK REGISTRATION REGISTRATION 90505	IHW CORRECTIVE ACTION SOLID WASTE REGISTRATION # (SWR) 30079
UNDERGROUND INJECTION CONTROL PERMIT WDW004	UNDERGROUND INJECTION CONTROL PERMIT WDW028
UNDERGROUND INJECTION CONTROL PERMIT WDW029	UNDERGROUND INJECTION CONTROL PERMIT WDW030
UNDERGROUND INJECTION CONTROL PERMIT WDW105	UNDERGROUND INJECTION CONTROL PERMIT WDW106
UNDERGROUND INJECTION CONTROL PERMIT WDW142	UNDERGROUND INJECTION CONTROL PERMIT WDW143
UNDERGROUND INJECTION CONTROL PERMIT WDW144	WASTEWATER PERMIT WQ0000476000
WASTEWATER EPA ID TX0006050	AIR EMISSIONS INVENTORY ACCOUNT NUMBER VC0008Q
POLLUTION PREVENTION PLANNING ID NUMBER P06852	INDUSTRIAL AND HAZARDOUS WASTE EPA ID TXR000057968
INDUSTRIAL AND HAZARDOUS WASTE PERMIT 50393	INDUSTRIAL AND HAZARDOUS WASTE PERMIT 50056
INDUSTRIAL AND HAZARDOUS WASTE SOLID WASTE REGISTRATION # (SWR) 87449	TAX RELIEF ID NUMBER 16591
TAX RELIEF ID NUMBER 20128	TAX RELIEF ID NUMBER 16929
TAX RELIEF ID NUMBER 17849	TAX RELIEF ID NUMBER 23356
TAX RELIEF ID NUMBER 16589	TAX RELIEF ID NUMBER 20129
TAX RELIEF ID NUMBER 16734	TAX RELIEF ID NUMBER 18582
TAX RELIEF ID NUMBER 16590	TAX RELIEF ID NUMBER 16592
Compliance History Period: September 01, 2015 to August	· · · · · · · · · · · · · · · · ·
Date Compliance History Report Prepared:       January 1         Agency Decision Requiring Compliance History:       Enf	orcement
Component Period Selected: January 11, 2016 to January	
TCEQ Staff Member to Contact for Additional Informatic	on Regarding This Compliance History.
- Name: Yuliya Dunaway	Phone: (210) 403-4077
Site and Owner/Operator History:	
1) Has the site been in existence and/or operation for the full five yea	r compliance period? YES
2) Has there been a (known) change in ownership/operator of the site	
Components (Multimedia) for the Site Are Listed i	in Sections A - J

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

Effective Date: 07/12/2017 ADMINORDER 2015-1398-WDW-E (1660 Order-Agreed Order With Denial) Classification: Moderate Citation: 30 TAC Chapter 331, SubChapter D 331.64(b) 40 CFR Chapter 146, SubChapter D, PT 146, SubPT G 146.68(a) Rgmt Prov: PP. VIII.G. OP Description: Failed to monitor the specific gravity of injected waste in WDW 105 at least once every 24 hours Classification: Moderate Citation: 30 TAC Chapter 331, SubChapter D 331.63(e) 40 CFR Chapter 146, SubChapter D, PT 146, SubPT G 146.67(c) Rgmt Prov: PERMIT PP. VII. OPERATING PARAMETERS PERMIT PP.VII.F OP Description: Failed to maintain a positive pressure of 100 pounds per square inch gauge ("psig") over tubing injection pressure in the tubing-casing annulus in WDW 004 028, 105, 106, 142, 143, and 144 without dropping below this pressure differential for greater than 15 minutes Classification: Moderate Citation: 30 TAC Chapter 305, SubChapter F 305.125 30 TAC Chapter 331, SubChapter D 331.64(d) 30 TAC Chapter 331, SubChapter D 331.67(a) 40 CFR Chapter 146, SubChapter D, PT 146, SubPT G 146.67(f) Rgmt Prov: PP. VIII. A. Monitoring and Testing Reg. PERMIT PP.VIII.A. Monitoring and Testing Req. PERMIT Description: Failure to properly maintain and use continuous recording devices to record the injection pressure at WDW028 and WDW105 Classification: Minor Citation: 30 TAC Chapter 331, SubChapter D 331.67(a) Rqmt Prov: PP. IX. Record Keeping Requirements PERMIT PP.IX PERMIT Description: Failed to keep complete and accurate records of all monitoring Classification: Minor 30 TAC Chapter 331, SubChapter D 331.65(c)(1) Citation: 40 CFR Chapter 146, SubChapter D, PT 146, SubPT G 146.69(a) Description: Failed to comply with the guarterly reporting requirements for a Class I well injection operation Classification: Moderate Citation: 30 TAC Chapter 305, SubChapter F 305.125(1) Rgmt Prov: WDW144 Provision VII.F PERMIT Description: Failed to notify the TCEQ of the March 17, 2014 pressure deviation in the tubing-casing annulus in WDW 144 Effective Date: 01/16/2018 ADMINORDER 2017-0669-WDW-E (1660 Order-Agreed Order With Denial) Classification: Major Citation: 30 TAC Chapter 331, SubChapter D 331.63(e) 40 CFR Chapter 146, SubChapter D, PT 146, SubPT G 146.67(c) Rqmt Prov: PP.VII.F. Operating Parameters PERMIT Description: Failed to maintain an annulus pressure of at least 100 psi greater than the injection tubing pressure to prevent leaks from the well into unauthorized zones and to detect well malfunctions Classification: Minor Citation: 30 TAC Chapter 305, SubChapter F 305.125(1) 30 TAC Chapter 331, SubChapter D 331.67(a) 40 CFR Chapter 146, SubChapter D, PT 146, SubPT G 146.67(f) Rqmt Prov: PP.IX. Record Keeping Requirements PERMIT Description: Failed to keep complete and accurate records of all monitoring Effective Date: 07/25/2018 ADMINORDER 2017-0236-IHW-E (1660 Order-Agreed Order With Denial) Classification: Minor Citation: 30 TAC Chapter 305, SubChapter F 305.125(1) 30 TAC Chapter 335, SubChapter F 335.152(a)(8) 40 CFR Chapter 264, SubChapter I, PT 264, SubPT J 264.195(b) 40 CFR Chapter 264, SubChapter I, PT 264, SubPT J 264.195(c) Rgmt Prov: PP.III.D General Inspection Requirements PERMIT Description: Failed to conduct daily inspections of permitted HW tanks and less than 90-day HW tanks Classification: Minor 30 TAC Chapter 305, SubChapter F 305.125(1) Citation:

1

2

3

30 TAC Chapter 335, SubChapter F 335.152(a)(1) 40 CFR Chapter 264, SubChapter I, PT 264, SubPT B 264.15(d) 40 CFR Chapter 265, SubChapter I, PT 265, SubPT B 265.15(d) Rgmt Prov: PP.III.D General Inspection Requirements PERMIT Description: Failed to properly record inspections in an inspection log or summary Classification: Moderate 30 TAC Chapter 305, SubChapter F 305.125(1) Citation: 30 TAC Chapter 335, SubChapter F 335.152(a)(7) 40 CFR Chapter 264, SubChapter I, PT 264, SubPT I 264.171 Rgmt Prov: PP.V.B.2 Container Storage Areas PERMIT Description: Failed to properly manage containers holding HW Classification: Moderate Citation: 30 TAC Chapter 335, SubChapter C 335.69(a)(1)(B) 40 CFR Chapter 265, SubChapter I, PT 265, SubPT J 265.193(e)(1)(iii) Description: Failed to maintain the external liners of secondary containment systems free of cracks and gaps Classification: Moderate Citation: 30 TAC Chapter 335, SubChapter E 335.112(a)(9) 40 CFR Chapter 265, SubChapter I, PT 265, SubPT J 265.193(e)(3)(ii) Description: Failed to protect a double-walled tank system, if constructed of metal, from both corrosion of the primary tank interior and the external surface of the outer shell Classification: Minor Citation: 30 TAC Chapter 335, SubChapter C 335.69(a)(3) 30 TAC Chapter 335, SubChapter C 335.69(d)(2) 40 CFR Chapter 262, SubChapter I, PT 262, SubPT C 262.34(a)(3) 40 CFR Chapter 262, SubChapter I, PT 262, SubPT C 262.34(c)(1)(ii) Description: Failed to clearly label all HW containers with the words "Hazardous Waste" Classification: Moderate Citation: 30 TAC Chapter 335, SubChapter C 335.69(d)(1) 40 CFR Chapter 262, SubChapter I, PT 262, SubPT C 262.34(c)(1)(i) 40 CFR Chapter 265, SubChapter I, PT 265, SubPT I 265.173(a) Description: Failed to keep a container storing HW closed except when adding or removing waste Classification: Minor 30 TAC Chapter 335, SubChapter A 335.6(c) Citation: Description: Failed to update the Facility's NOR Classification: Minor Citation: 30 TAC Chapter 335, SubChapter A 335.10(a) 40 CFR Chapter 262, SubChapter I, PT 262, SubPT B 262.20(a)(1) Description: Failed to properly complete an HW manifest Effective Date: 05/13/2019 ADMINORDER 2018-0096-AIR-E (1660 Order-Agreed Order With Denial) Classification: Moderate Citation: 30 TAC Chapter 101, SubChapter A 101.20(3) 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) Rgmt Prov: SC 14 PERMIT STC 14 OP

STC 16 OP

Description: Failure to perform daily visible emissions observations when the associated baghouse and particulate scrubbers are in operation.

See addendum for information regarding federal actions.

### B. Criminal convictions:

N/A

4

C. Chronic excessive emissions events:

N/A

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

Item 1 January 15, 2016 (1288802)

Item 2	February 08, 2016	(1308369)
Item 3	March 17, 2016	(1331749)
Item 4	March 23, 2016	(1314458)
Item 5	April 19, 2016	(1338912)
Item 6	May 16, 2016	(1345712)
Item 7	June 17, 2016	(1338085)
Item 8	June 21, 2016	(1338726)
Item 9	July 25, 2016	(1344859)
Item 10	July 28, 2016	(1349096)
Item 11	August 02, 2016	(1349188)
Item 12	August 04, 2016	(1349169)
Item 13	August 16, 2016	(1275931)
Item 14	August 18, 2016	(1365552)
Item 15	August 26, 2016	(1342188)
Item 16	September 16, 2016	(1372253)
Item 17	September 30, 2016	(1363528)
Item 18	October 18, 2016	(1378430)
Item 19	October 25, 2016	(1364733)
Item 20	November 10, 2016	(1371863)
Item 21	November 17, 2016	(1384389)
Item 22	December 13, 2016	(1390527)
		. ,
Item 23 Item 24	January 17, 2017	(1397143)
	January 26, 2017	(1387943)
Item 25	February 14, 2017	(1393753)
Item 26	February 16, 2017	(1377914)
Item 27	February 20, 2017	(1370290)
Item 28	March 22, 2017	(1401605)
Item 29	April 11, 2017	(1383077)
Item 30	April 14, 2017	(1402007)
Item 31	April 19, 2017	(1417631)
Item 32	May 18, 2017	(1425220)
Item 33	May 25, 2017	(1400959)
Item 34	June 01, 2017	(1416000)
Item 35	June 13, 2017	(1416112)
Item 36	July 16, 2017	(1423925)
Item 37	July 24, 2017	(1396487)
Item 38	July 28, 2017	(1425002)
Item 39	August 01, 2017	(1429972)
Item 40	August 04, 2017	(1401463)
Item 41	August 18, 2017	(1443520)
Item 42	August 29, 2017	(1435824)
Item 43	September 12, 2017	(1436937)
Item 44	September 20, 2017	(1450147)
Item 45	October 18, 2017	(1455967)
Item 46	November 14, 2017	(1461448)
Item 47	December 14, 2017	(1442855)
Item 48	December 19, 2017	(1467827)
Item 49	January 16, 2018	(1474532)
Item 50	April 06, 2018	(1435175)
Item 51	April 18, 2018	(1493672)
Item 52	May 04, 2018	(1482739)
Item 53	May 17, 2018	(1500590)
Item 54	June 11, 2018	(1486276)
Item 55	June 14, 2018	(1480270)
Item 56	July 18, 2018	(1507707)
Item 57		(1514024) (1506476)
	August 02, 2018	. ,
Item 58	August 20, 2018	(1520086)
Item 59	August 27, 2018	(1512265)
Item 60	September 20, 2018	(1527251)
Item 61	September 28, 2018	(1513672)

Item 62	October 01, 2018	(1513685)
Item 63	October 11, 2018	(1519563)
Item 64	October 17, 2018	(1533609)
Item 65	October 24, 2018	(1519338)
Item 66	November 29, 2018	(1525087)
Item 67	January 14, 2019	(1532406)
Item 68	January 17, 2019	(1559659)
Item 69	January 24, 2019	(1539278)
Item 70	February 19, 2019	(1559657)
Item 71	February 25, 2019	(1549775)
Item 72	March 18, 2019	(1559658)
Item 73	March 29, 2019	(1551550)
Item 74	April 18, 2019	(1571825)
Item 75	May 20, 2019	(1583259)
Item 76	May 28, 2019	(1569602)
Item 77	May 30, 2019	(1553423)
Item 78	June 19, 2019	(1583260)
Item 79	June 21, 2019	(1575818)
Item 80	June 28, 2019	(1570896)
Item 81	July 02, 2019	(1578105)
Item 82	July 11, 2019	(1575847)
Item 83	July 19, 2019	(1593138)
Item 84	August 01, 2019	(1580321)
Item 85	August 07, 2019	(1579874)
Item 86	August 08, 2019	(1580982)
Item 87	October 17, 2019	(1613235)
Item 88	November 01, 2019	(1604022)
Item 89	December 12, 2019	(1611822)
Item 90	December 19, 2019	(1626401)
Item 91	February 18, 2020	(1640661)
Item 92	March 18, 2020	(1647181)
Item 93	April 17, 2020	(1653517)
Item 94	May 27, 2020	(1651341)
Item 95	June 18, 2020	(1666608)
Item 96	June 26, 2020	(1657712)
Item 97	June 29, 2020	(1658245)
Item 98	July 16, 2020	(1673565)
Item 99	July 29, 2020	(1665306)
Item 100	August 05, 2020	(1665506)
Item 101	August 17, 2020	(1680340)
Item 102	August 25, 2020	(1650930)
Item 103	August 31, 2020	(1671744)
Item 104	September 17, 2020	(1686909)
Item 105	September 25, 2020	(1678190)
Item 106	October 06, 2020	(1679294)
Item 107	October 20, 2020	(1679423)
Item 108	October 26, 2020	(1684969)
Item 109	November 13, 2020	(1685140)
Item 110	November 17, 2020	(1686149)
Item 111	December 03, 2020	(1691410)
Item 112	December 09, 2020	(1678701)
Item 113	December 15, 2020	(1691806)
		()

### 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: 04/3	30/2020 (166	0104)		
	Self Report?	YES		Classification:	Moderate
	Citation:		ter 26, SubChapter A 26.121(a) er 305, SubChapter F 305.125(2		
	Description:	Failure to mee	t the limit for one or more pern	nit parameter	

Date: 05 Self Report?	/29/2020 NO	(1644596)	Classification:	Moderate
Citation:	30 TAC 30 TAC 5C THS GTC OP SC 7C F	PERMIT	5(c)	Houchaite
	STC 15 STC 4E	OP		
Description:	system	to comply with time requirements fo (CEMS) maintenance.		-
Self Report?	NO		Classification:	Moderate
Citation:	30 TAC 30 TAC 30 TAC	A ERMIT OP	5(c)	
Description:	Failure	to maintain opacity from a vent belo	w 20% averaged over	er a six-minute period.
Self Report?	NO		Classification:	Moderate
Citation:	30 TAC 30 TAC	ERMIT OP	)5	
Description:	Failure	to maintain nitric acid production en er million by volume.	nissions of nitrogen o	xides (NOx) below 600
Self Report?	NO		Classification:	Moderate
Citation:	30 TAC 30 TAC 30 TAC	ERMIT	5(c) )5	
Description:		to comply with the hourly NOx rate on MAERT) of NSR 809.	of the Maximum Allow	wable Emission Rates
Self Report?	NO		Classification:	Moderate
Citation:	30 TAC 30 TAC 30 TAC	Chapter 113, SubChapter C 113.620 Chapter 116, SubChapter B 116.111 Chapter 116, SubChapter B 116.111 Chapter 122, SubChapter B 122.143 Chapter 122, SubChapter B 122.143	5(b) 5(c) 3(4)	
	5C THS GTC OP SC 5C4	PERMIT PERMIT OP OP	SubPT EEE 63.1206(c	:)(3)(vii)
Description: Self Report?	Failure NO	to comply with 40 CFR Part 63, Subp	oart EEE. Classification:	Moderate
Citation:	30 TAC	ERMIT		
Description: Self Report?		to comply with special conditions of	NSR 9560. Classification:	Moderate
Citation:		Chapter 116, SubChapter B 116.11		
listory Report f		Chapter 122, SubChapter B 122.143 82231, RN102663671, Rating Year 2		Compliance History (CH) components f

	5C THSC Chapter 382 382.085(b) GTC OP SC 5B PERMIT STC 15 OP
Description: Self Report?	Failure to comply with special conditions of NSR 9560. NO Classification: Moderate
Citation:	30 TAC Chapter 116, SubChapter B 116.115(b) 30 TAC Chapter 116, SubChapter B 116.115(c) 30 TAC Chapter 122, SubChapter B 122.143(4) 30 TAC Chapter 122, SubChapter B 122.143(6) 40 CFR Chapter 63, SubChapter C, PT 63, SubPT EEE 63.1211(b) 5C THSC Chapter 382 382.085(b) GTC OP SC 5C4 PERMIT STC 15 OP STC 1E OP
Description: Self Report?	Failure to comply with 40 CFR Part 63, Subpart EEE. 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) GTC OP SC 1 PERMIT STC 15 OP
Description:	Failure to comply with the Maintenance, StartUp, and Shutdown Operations (MSS) hourly NH3 rate of MAERT of NSR 809.
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 63, SubChapter C, PT 63, SubPT H 63.167(a)(1) 5C THSC Chapter 382 382.085(b) GTC OP SC 12E PERMIT STC 15 OP
Description:	Failure to meet open-ended line (OEL) requirements. Specifically, Invista discovered five (5) OELs during the period. See DR1, deviation item number 16 and DR2, deviation item number 17.
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) GTC OP SC 11F PERMIT SC 12F PERMIT STC 15 OP
Description:	Failure to monitor all valves quarterly for fugitive emissions with approved gas analyzer.
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) GTC OP SC 11 PERMIT STC 15 OP
Description: Self Report?	Failure to comply with special conditions of NSR 813. 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 60.13 5C THSC Chapter 382 382.085(b) GTC OP SC 9 PERMIT STC 15 OP STC 4E OP
Description:	Failure to meet quarterly monitoring requirement for continuous emissions monitoring system (CEMS) testing.
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) GTC OP SC 7C PERMIT

Description:	STC 15 OP STC 4E OP Failure to meet hourly monitoring requireme	nt for continuous de	monstration of
Self Report?	compliance. NO	Classification:	Moderate
Citation:	30 TAC Chapter 116, SubChapter B 116.115 30 TAC Chapter 116, SubChapter B 116.115 30 TAC Chapter 122, SubChapter B 122.143 5C THSC Chapter 382 382.085(b) GTC OP SC 1 PERMIT STC 15 OP	(b)(2)(F) (c)	Houerate
Description:	Failure to comply with the hourly N2O rate o	f the MAERT of NSR	812.
Date: 08,	/17/2020 (1659535)		
Self Report?	NO	Classification:	Moderate
Citation:	40 CFR Chapter 63, SubChapter C, PT 63, Su 5C THSC Chapter 382 382.085(b) FOP 0-01902, Special Term & Condition 1 Ol	p	
Description: Self Report?	Failure to comply with time limit usage of en	Classification:	Moderate
Citation:	30 TAC Chapter 122, SubChapter B 122.143 40 CFR Chapter 82, SubChapter C, PT 82, Su 5C THSC Chapter 382 382.085(b)	• •	
Description: Self Report?	Failure to comply with certification requirements NO	ents for operating Re Classification:	lief Valves (RVs). Moderate
Citation:	30 TAC Chapter 101, SubChapter A 101.20( 30 TAC Chapter 113, SubChapter C 113.100 30 TAC Chapter 116, SubChapter B 116.115 30 TAC Chapter 122, SubChapter B 122.143	(c)	
Description:	40 CFR Chapter 60, SubChapter C, PT 60, Su 40 CFR Chapter 63, SubChapter C, PT 63, Su 5C THSC Chapter 382 382.085(b) FOP 0-01902, Special Term & Condition 22 C NSR 23271/PSDTX1416/PSDTX1079M2, SC Failure to prevent open-ended lines.	ubPT H 63.167(a)(1) DP	
•	· · ·		
Self Report?	NO	Classification:	Moderate
Self Report? Citation:	30 TAC Chapter 101, SubChapter A 101.20( 30 TAC Chapter 116, SubChapter B 116.111 30 TAC Chapter 116, SubChapter B 116.115 30 TAC Chapter 122, SubChapter B 122.143 30 TAC Chapter 122, SubChapter B 122.144 5C THSC Chapter 382 382.085(b) FOP 0-01902, General Terms & Condition 22 C NSR 23271/PSDTX1416/PSDTX1079M2, SC NSR 23271/PSDTX1416/PSDTX1079M2, SC NSR 23271/PSDTX1416/PSDTX1079M2, SC NSR 23271/PSDTX1416/PSDTX1079M2, SC NSR 23271/PSDTX1416/PSDTX1079M2, SC NSR 31376, SC 18 PERMIT	3) (c) (4) (1) PP DP 11D PERMIT 18A PERMIT 23 PERMIT 7 PERMIT	
Citation: Description: Self Report?	30 TAC Chapter 101, SubChapter A 101.20(3 30 TAC Chapter 116, SubChapter B 116.111 30 TAC Chapter 116, SubChapter B 116.115 30 TAC Chapter 122, SubChapter B 122.143 30 TAC Chapter 122, SubChapter B 122.144 5C THSC Chapter 382 382.085(b) FOP 0-01902, General Terms & Condition 22 C NSR 23271/PSDTX1416/PSDTX1079M2, SC NSR 23271/PSDTX1416/PSDTX1079M2, SC NSR 23271/PSDTX1416/PSDTX1079M2, SC NSR 23271/PSDTX1416/PSDTX1079M2, SC NSR 23271/PSDTX1416/PSDTX1079M2, SC NSR 31376, SC 18 PERMIT Failure to maintain records as required by ap NO	3) (c) (4) (1) PP DP 11D PERMIT 18A PERMIT 23 PERMIT 7 PERMIT pplicable state permit Classification:	
Citation: Description:	30 TAC Chapter 101, SubChapter A 101.20(3 30 TAC Chapter 116, SubChapter B 116.111 30 TAC Chapter 116, SubChapter B 116.115 30 TAC Chapter 122, SubChapter B 122.143 30 TAC Chapter 122, SubChapter B 122.144 5C THSC Chapter 382 382.085(b) FOP 0-01902, General Terms & Condition 22 C NSR 23271/PSDTX1416/PSDTX1079M2, SC NSR 23271/PSDTX1416/PSDTX1079M2, SC NSR 23271/PSDTX1416/PSDTX1079M2, SC NSR 23271/PSDTX1416/PSDTX1079M2, SC NSR 23271/PSDTX1416/PSDTX1079M2, SC NSR 31376, SC 18 PERMIT Failure to maintain records as required by ap	3) (c) (4) (1) DP DP 11D PERMIT 18A PERMIT 23 PERMIT 7 PERMIT 7 PERMIT Classification: (c) (4)	t requirements.
Citation: Description: Self Report? Citation: Description:	30 TAC Chapter 101, SubChapter A 101.20(3 30 TAC Chapter 116, SubChapter B 116.111 30 TAC Chapter 116, SubChapter B 115.115 30 TAC Chapter 122, SubChapter B 122.143 30 TAC Chapter 122, SubChapter B 122.144 5C THSC Chapter 382 382.085(b) FOP 0-01902, General Terms & Condition 22 C NSR 23271/PSDTX1416/PSDTX1079M2, SC NSR 23271/PSDTX1416/PSDTX1079M2, SC NSR 23271/PSDTX1416/PSDTX1079M2, SC NSR 23271/PSDTX1416/PSDTX1079M2, SC NSR 31376, SC 18 PERMIT Failure to maintain records as required by ap NO 30 TAC Chapter 116, SubChapter B 116.115 30 TAC Chapter 122, SubChapter B 122.143 5C THSC Chapter 382 382.085(b) FOP 0-01902, Special Term & Condition 22 C NSR 31376, SC 10 PERMIT Failure to conduct wastewater testing on a q state permit	3) (c) (4) (1) DP DP 11D PERMIT 18A PERMIT 23 PERMIT 7 PERMIT 7 PERMIT classification: (c) (4) DP uarterly basis as req	t requirements. Moderate uired by the applicable
Citation: Description: Self Report? Citation:	30 TAC Chapter 101, SubChapter A 101.20(3 30 TAC Chapter 116, SubChapter B 116.111 30 TAC Chapter 116, SubChapter B 116.115 30 TAC Chapter 122, SubChapter B 122.143 30 TAC Chapter 122, SubChapter B 122.144 5C THSC Chapter 382 382.085(b) FOP 0-01902, General Terms & Condition 22 C NSR 23271/PSDTX1416/PSDTX1079M2, SC NSR 23271/PSDTX1416/PSDTX1079M2, SC NSR 23271/PSDTX1416/PSDTX1079M2, SC NSR 23271/PSDTX1416/PSDTX1079M2, SC NSR 31376, SC 18 PERMIT Failure to maintain records as required by ap NO 30 TAC Chapter 116, SubChapter B 116.115 30 TAC Chapter 122, SubChapter B 122.143 5C THSC Chapter 382 382.085(b) FOP 0-01902, Special Term & Condition 22 C NSR 31376, SC 10 PERMIT Failure to conduct wastewater testing on a q	3) (c) (4) (1) PP DP 11D PERMIT 18A PERMIT 23 PERMIT 7 PERMIT 7 PERMIT Classification: (c) (4)	t requirements. Moderate
Citation: Description: Self Report? Citation: Description: Self Report? Citation:	30 TAC Chapter 101, SubChapter A 101.20(3 30 TAC Chapter 116, SubChapter B 116.111 30 TAC Chapter 116, SubChapter B 112.143 30 TAC Chapter 122, SubChapter B 122.144 5C THSC Chapter 382 382.085(b) FOP 0-01902, General Terms & Condition 22 C NSR 23271/PSDTX1416/PSDTX1079M2, SC NSR 23271/PSDTX1416/PSDTX1079M2, SC NSR 23271/PSDTX1416/PSDTX1079M2, SC NSR 23271/PSDTX1416/PSDTX1079M2, SC NSR 23271/PSDTX1416/PSDTX1079M2, SC NSR 31376, SC 18 PERMIT Failure to maintain records as required by ap NO 30 TAC Chapter 116, SubChapter B 116.115 30 TAC Chapter 122, SubChapter B 122.143 5C THSC Chapter 382 382.085(b) FOP 0-01902, Special Term & Condition 22 C NSR 31376, SC 10 PERMIT Failure to conduct wastewater testing on a q state permit NO 30 TAC Chapter 101, SubChapter A 101.20(3 30 TAC Chapter 116, SubChapter B 116.115 30 TAC Chapter 116, SubChapter B 116.115 30 TAC Chapter 116, SubChapter B 116.115 30 TAC Chapter 116, SubChapter B 116.115 50 TAC Chapter 116, SubChapter B 116.115 50 TAC Chapter 116, SubChapter B 116.115 30 TAC Chapter 116, SubChapter B 116.110 30 TAC Chapter 116, SubChapter B 116.115 30 TAC Chapter 122, SubChapter B 122.143 5C THSC Chapter 382 382.085(b) FOP 0-01902, Special Term & Condition 22 C NSR 23271/PSDTX1416/PSDTX1079M2, GT8	3) (c) (4) (1) PP PP 11D PERMIT 18A PERMIT 23 PERMIT 7 PERMIT pplicable state permit Classification: (c) (4) DP uarterly basis as req Classification: 3) (e)(2) (b) (4) DP	t requirements. Moderate uired by the applicable
Citation: Description: Self Report? Citation: Description: Self Report?	30 TAC Chapter 101, SubChapter A 101.20(3 30 TAC Chapter 116, SubChapter B 116.111 30 TAC Chapter 116, SubChapter B 112.143 30 TAC Chapter 122, SubChapter B 122.144 5C THSC Chapter 382 382.085(b) FOP 0-01902, General Terms & Condition 22 C NSR 23271/PSDTX1416/PSDTX1079M2, SC NSR 23271/PSDTX1416/PSDTX1079M2, SC NSR 23271/PSDTX1416/PSDTX1079M2, SC NSR 23271/PSDTX1416/PSDTX1079M2, SC NSR 23271/PSDTX1416/PSDTX1079M2, SC NSR 31376, SC 18 PERMIT Failure to maintain records as required by ap NO 30 TAC Chapter 116, SubChapter B 116.115 30 TAC Chapter 122, SubChapter B 122.143 5C THSC Chapter 382 382.085(b) FOP 0-01902, Special Term & Condition 22 C NSR 31376, SC 10 PERMIT Failure to conduct wastewater testing on a q state permit NO 30 TAC Chapter 101, SubChapter A 101.20(3 30 TAC Chapter 116, SubChapter B 116.115 30 TAC Chapter 101, SubChapter A 101.20(3 30 TAC Chapter 116, SubChapter B 116.115 30 TAC Chapter 116, SubChapter B 116.115 30 TAC Chapter 116, SubChapter B 116.110 30 TAC Chapter 116, SubChapter B 116.110 30 TAC Chapter 116, SubChapter B 116.115 30 TAC Chapter 122, SubChapter B 122.143 5C THSC Chapter 382 382.085(b) FOP 0-01902, Special Term & Condition 22 C	3) (c) (4) (1) PP PP 11D PERMIT 18A PERMIT 23 PERMIT 7 PERMIT pplicable state permit Classification: (c) (4) PP uarterly basis as req Classification: 3) (e)(2) (b) (4) P CLassification: 3) (a)(1)(F)	t requirements. Moderate uired by the applicable

Compliance History Report for CN602582231, RN102663671, Rating Year 2020 which includes Compliance History (CH) components from January 11, 2016, through January 11, 2021.

Description:	30 TAC Chapter 122, SubChapter B 122.143(4) 5C THSC Chapter 382 382.085(b) FOP O-01902, Special Term & Condition 3A OP NSR 23271/PSDTX1416/PSDTX1079M2, SC 3 PERMIT Failure to conduct quarterly Method 9 observations.
Date: 08/	20/2020 (1658179)
Self Report?	NO Classification: Moderate
Citation:	2D TWC Chapter 26, SubChapter A 26.121(a)(1) 30 TAC Chapter 305, SubChapter F 305.125(1) Permit Conditions; No. 2g, Pg. 7 PERMIT
Description:	Failed to prevent an unauthorized discharge of wastewater or any other waste.
Date: 08/	25/2020 (1657948)
Self Report?	NO Classification: Moderate
Citation:	1904 ST&C 1A OP 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) 7186, SC 11 PERMIT
Description:	Failure to comply with the requirements listed in an applicable state permit. Specifically, on April 3, 2019 Invista loaded crude cresol into a tank trailer that had an expired Department of Transportation (DOT) leak tight check and annual DOT Certification.
Self Report?	NO Classification: Moderate
Citation:	1904 ST&C 1A OP 30 TAC Chapter 116, SubChapter B 116.115(c) 30 TAC Chapter 122, SubChapter B 122.143(4) 40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.169(c)(1)
Description:	5C THSC Chapter 382 382.085(b) Failure to comply with the requirements listed in an applicable state permit. Specifically, Invista failed to repair a pump within the fifteen-day regulatory timeframe. The pump was found leaking on April 11, 2019 but was not placed on Delay of Repair until June 10, 2019.
Self Report?	NO Classification: Moderate
Citation: Description:	1904 ST&C 28 OP 30 TAC Chapter 116, SubChapter B 116.115(c) 30 TAC Chapter 122, SubChapter B 122.143(4) 40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.167(a)(2) 5C THSC Chapter 382 382.085(b) 7186, SC 21F PERMIT Failure to equip each open-ended line (OEL) with a cap, blind flange, plug, or second valve to seal the line. Specifically, Invista discovered thirty-four (34) open ended lines
Calf Danasta	from April 1, 2019 through March 31, 2020.
Self Report?	NO Classification: Moderate
Citation:	1904 ST&C 1A OP 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)
Description:	Failure to perform visible emissions observations. Specifically, Invista failed to perform visible emissions observations five (5) times from May 22, 2019 through June 3, 2019 for the Butadiene Flare and the Cold NH3 Flare.
Self Report?	NO Classification: Moderate
Citation:	1904 ST&C 1 OP 30 TAC Chapter 116, SubChapter B 116.115(c) 30 TAC Chapter 122, SubChapter B 122.143(4) 40 CFR Part 63, Subpart H 63.166 5C THSC Chapter 382 382.085(b) 7186, SC 1 PERMIT
Description:	Failure to send purged liquids from a sample station to a closed-purge, closed-loop, or closed-vent system. Specifically, Invista's ADN column tails sample station drain was plugged which sent purged liquids from the ADN column tail sample station to their slab and open trench areas.
Self Report?	NO Classification: Moderate
Citation:	1904 ST&C 28 OP 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) 7186, SC 1 PERMIT
Description:	Failure to comply with the requirements listed in an applicable state permit. Specifically, Invista exceeded the 12-month rolling throughput from April 1, 2019 through September 30, 2019 for the PN Seal Flush Tank.

5

Self Report?	NO	Classification:	Moderate
Citation:	1904 ST&C 28 OP 30 TAC Chapter 101, SubChapter F 101.201 30 TAC Chapter 116, SubChapter B 116.115( 30 TAC Chapter 122, SubChapter B 122.143( 5C THSC Chapter 382 382.085(b) 7186, SC 1 PERMIT	4)	
Description:	Failure to notify the TCEQ Corpus Christi Reg within 24 hours after the discovery of the eve Commission on Environmental Quality (TCEQ Reporting System (STEERS) Incident No. 325 2019 at 0542 hours; however, Invista reporte November 26, 2019 at 0311 hours which was	ent. Specifically, an )/State of Texas Env 563, was discovere ed the event to the	emissions event, Texas vironmental Electronic d on November 22, TCEQ Region Office on
	28/2020 (1624119)		
Self Report?	NO	Classification:	Moderate
Citation:	30 TAC Chapter 101, SubChapter A 101.20(3 30 TAC Chapter 116, SubChapter B 116.115( 30 TAC Chapter 122, SubChapter B 122.143( 5C THSC Chapter 382 382.085(b) PSDTX 1448, SC 8(E) PERMIT ST&C 16 OP	c)	
Description:	Failure to equip each open-ended valve or lin blind flange, plug, or a second valve to seal t		propriately sized cap,
Self Report?	NO	Classification:	Moderate
Citation:	30 TAC Chapter 101, SubChapter A 101.20(3 30 TAC Chapter 116, SubChapter B 116.115( 30 TAC Chapter 122, SubChapter B 122.143( 5C THSC Chapter 382 382.085(b) PSDTX 1448, SC 16 PERMIT ST&C 16 OP	c)	
Description:	Failure to maintain valid data of differential p baghouse for at least 95 percent of the time previous rolling 12-month period.		
Self Report?	NO	Classification:	Moderate
Citation:	30 TAC Chapter 101, SubChapter A 101.20(3 30 TAC Chapter 116, SubChapter B 116.115( 30 TAC Chapter 122, SubChapter B 122.143( 5C THSC Chapter 382 382.085(b) PSDTX 1448, SC 8(F) PERMIT ST&C 16 OP	c)	
Description:	Failure to re-monitor the replacement for a le placed back into volatile organic compound ()		ithin 15 days of being
Self Report?	NO	Classification:	Moderate
Citation:	30 TAC Chapter 122, SubChapter B 122.143( 5C THSC Chapter 382 382.058(b) ST&C 15 OP	4)	
Description: Self Report?	Failure to conduct visible emissions observati NO	ons once per calenc Classification:	lar quarter. Moderate
Citation:	30 TAC Chapter 101, SubChapter F 101.201( 30 TAC Chapter 122, SubChapter B 122.143( 5C THSC Chapter 382 382.085(b) ST&C 2(F) OP		
Description:	Failure to create complete final records of all events as soon as practicable but no later that emissions events.		
Self Report?	NO	Classification:	Moderate
Citation:	30 TAC Chapter 101, SubChapter A 101.20(3	)	
	30 TAC Chapter 116, SubChapter B 116.115( 30 TAC Chapter 116, SubChapter B 116.115( 30 TAC Chapter 122, SubChapter B 122.143( 5C THSC Chapter 382 382.085(b) PSDTX 1448, GC 14 PA PSDTX 1448, GC 8 PERMIT PSDTX 1448, SC 1 PERMIT ST&C 16 OP	c)	
Description:	Failure to prevent unauthorized emissions to (recordable) emissions events.	the atmosphere dur	ring non-reportable
Self Report?	NO	Classification:	Moderate
Citation:	30 TAC Chapter 122, SubChapter B 122.143( 30 TAC Chapter 122, SubChapter B 122.145(		

5C THSC Chapter 382 382.085(b) GT&C OP Description: Failure to report all instances of deviations.

Date:	09/3	30/2020	(1693256)			
Self Repo	ort?	YES			Classification:	Moderate
Citation:		2D TWO	Chapter 26, SubChapt	er A 26.121(a)		
		30 TAC	Chapter 305, SubChapt	er F 305.125(1	L)	
Descriptio	on:	Failure	to meet the limit for one	e or more perm	nit parameter	

#### F. Environmental audits:

7

Notice of Intent Date: 07/21/2017 (1429814) No DOV Associated

 Notice of Intent Date:
 10/24/2018 (1526495)

 Disclosure Date:
 01/29/2019

 Viol. Classification:
 Moderate

 Citation:
 40 CFR Chapter 63, SubChapter C, PT 63, SubPT EEE 63.1211(c)(4)

 Description:
 Failed to implement the new operating parameter limits included in the Notification of Compliance

Description: Failed to implement the new operating parameter limits included in the Notification of Compliance Status for Boilers 7 and 8 signed on May 22, 2018.

Viol. Classification: Moderate

Citation: 30 TAC Chapter 122, SubChapter B 122.146(4)

Description: Failed to report excess emissions of NOX from Boiler 7 during a period of Subpart D applicability on April 27 and 28, 2018. Specifically, the performance test for Boilers 7 and 8 performed under 40 CFR 60 Subpart D resulted in an emissions rate below 70% of the emission standard for oxides of nitrogen (NOx). As a result, Subpart D did not require the units to use continuous emissions monitoring systems for NOx. However, the units had NOx analyzers on the individual ducts.

Viol. Classification: Minor

Citation: 40 CFR Chapter 60, SubChapter C, PT 60, SubPT D 60.45(e)

Description: Failed to use the required method to convert NOx concentration data to units of the standard using the F-factor for the appropriate fuel consumed. Specifically, the conversion was performed using the correlation between combustion air flow and stack gas flow derived from the Hazardous Waste Combustion MACT (MACT EEE) performance test, which did not conform to the method required by the regulation (NSPS D).

Viol. Classification: Moderate

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

Rqmt Prov: PERMIT SC No. 13.A.

Description: Failed to maintain required monitored emission rate data stored in units of pounds per hour on a 30-day rolling average basis for the West Power House. Specifically, this data was not readily available.

Viol. Classification: Moderate

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

Rqmt Prov: PERMIT SC No. 18.A. PERMIT SC No. 5.A.

PERMIT SC No. 5.B.

PERMIT SC No. 6

Description: Failed to generate and maintain 24-hour and 30-day rolling average emissions data for the Cogen unit. Specifically, this data was not readily available after February 2017.

Viol. Classification: Moderate

Citation: 40 CFR Chapter 75, SubChapter C, PT 75, SubPT H 75, 70(a)(2)

Description: Failed to perform sampling for methane or gross calorific value required by the referenced section of 40 CFR Part 75 Appendix D. Natural gas sampling was performed as required by 40 CFR 60 Subpart GG to demonstrate compliance with the sulfur standard.

Viol. Classification: Moderate

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

Rqmt Prov: PERMIT SC No. 10.E.

Description: Failed to maintain records of tank throughput for the previous month and the past 12 consecutive months for August and September 2018.

Viol. Classification: Moderate

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

Rqmt Prov: PERMIT SC No. 41

Description: Failed to review the control efficiency calculations of the VNOx system. Specifically, the Special Condition No. 41 of Permit No. 810 requires the VNOx system to operate at an overall N2O control efficiency of 95% for Adipic Acid unit off gas (there are no monitoring requirements or operating parameter limits specified in the permit to assure 95% control efficiency). The efficiency appeared to be calculated in the site monitoring system but this data was not routinely reviewed.

Notice of Intent Date: 05/10/2019 (1569892) Disclosure Date: 10/09/2019 Viol. Classification: Minor Citation: 30 TAC Chapter 101, SubChapter A 101.20(2) 30 TAC Chapter 116, SubChapter B 116.115(c) 40 CFR Chapter 61, SubChapter C, PT 61, SubPT FF 61.349(a)(1)(i) Rgmt Prov: PERMIT Special Condition No. 16.F Description: Failed to monitor accessible valves by leak-checking for fugitive emissions at least quarterly using and approved gas analyzer. Specifically, 53 light liquid/gas vapor normal to monitor valves were not previously included in the LDAR program. Viol. Classification: Minor Citation: 30 TAC Chapter 101, SubChapter A 101.20(2) 40 CFR Chapter 61, SubChapter C, PT 61, SubPT FF 61.349(a)(1)(i) Description: Failed to design and operate the closed vent system with no detectable emissions. Specifically, 82 connectors were not previously included in the LDAR program. Notice of Intent Date: 09/12/2019 (1597949) Disclosure Date: 10/18/2019 Viol. Classification: Moderate Citation: 30 TAC Chapter 116, SubChapter B 116.115(b)(2)(F) 30 TAC Chapter 116, SubChapter B 116.115(c) Rgmt Prov: PERMIT Special Condition No. 1 Description: Failed to maintain Natural Gas (NG) supplemental fuel flow rates for the Cold NH3 Flare (EPN 10FLR004A) at rates used to calculate the MAER. Specifically, the NG flow was determined to be 6500 scfh which is greater than the NG flow for NH3 Secondary Condenser Purge (normal operations) and for 11 MSS activities. Notice of Intent Date: 10/23/2019 (1609957) Disclosure Date: 02/25/2020 Viol. Classification: Moderate Citation: 30 TAC Chapter 101, SubChapter A 101.10(a)(1) 30 TAC Chapter 101, SubChapter A 101.10(b)(1) Failed to capture Acids Waste tank annual emissions in the site Emissions Inventory (EI) since the 2016 EI, Description: affecting the following units: 18TFL027, 18LTR027, 18LTR073, 18TFL030, 18LTR030, 18SMP063, 18TFL065, 18TFX072, 18TFX073, 18SEP075, 18SMP736, AND 18SMP737. Notice of Intent Date: 04/28/2020 (1645995) No DOV Associated Notice of Intent Date: 09/03/2020 (1672623) Disclosure Date: 10/27/2020 Viol. Classification: Moderate Citation: 30 TAC Chapter 334, SubChapter N 334.602(a) Description: Failed to perform or properly document Class C Operator training. Viol. Classification: Minor Citation: 30 TAC Chapter 334, SubChapter C 334.42(i) Description: Failed to document spill containment inspections of sumps and manways. Viol. Classification: Moderate 30 TAC Chapter 334, SubChapter C 334.50(d)(9) Citation: 30 TAC Chapter 334, SubChapter C 334.50(d)(9)(A) 30 TAC Chapter 334, SubChapter C 334.50(d)(9)(A)(i) 30 TAC Chapter 334, SubChapter C 334.50(d)(9)(A)(iii) Description: Failed to reconcile tank daily inventory and throughput monthly for CY2020. Viol. Classification: Moderate Citation: 30 TAC Chapter 334, SubChapter N 334.602(a)(4) Description: Failed to post safety and emergency contact information signage at fuel dispensers. Notice of Intent Date: 12/15/2020 (1698245) 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

### **Component Appendices**

### Appendix A

### All NOVs Issued During Component Period 1/11/2016 and 1/11/2021

1	Date:	01/31/2016	(1325020)
	Self Report	? YES	For Informational P <sup>Classification</sup> : On <sup>Moderate</sup>
	Citation:		Chapter 26, SubChapter A 26.121(a) Chapter 305, SubChapter F 305.125(1)
	Description	: Failure to	meet the limit for one or more permit parameter
2	Date:	04/18/2016	(1308014)
-	Self Report		
	Citation:	30 TAC C	Chapter 101, SubChapter F 101.201(c) Chapter 382 382.085(b)
	Description	: Failure to	b notify the TCEQ Corpus Christi Region Office of a reportable emissions event hours after the discovery of the event.
	Self Report	? NO	For Informational PClassification: OnModerate
	Citation:	30 TAC C	Chapter 111, SubChapter A 111.111(a)(1)(B) Chapter 116, SubChapter B 116.115(c) Chapter 382 382.085(b)
	Description	: Failure to	prevent visible emissions with opacity greater than a limit of 20 percent (%) l over a six-minute period from the West Power Houses Boiler No. 1.
	Self Report	-	For Informational PClassification: OnModerate
	Citation:	30 TAC C 5C THSC	Chapter 101, SubChapter F 101.201(c) Chapter 382 382.085(b)
	Description		b submit a copy of the final record to the applicable commission office no later weeks after the end of the maintenance activity.
	Self Report	? NO	For Informational P <sup>Classification</sup> : On <sup>Moderate</sup>
	Citation:	30 TAC C	Chapter 111, SubChapter A 111.111(a)(1)(B) Chapter 116, SubChapter B 116.115(c) Chapter 382 382.085(b)
	Description	: Failure to averaged	p prevent visible emissions with opacity greater than a limit of 20 percent (%) I over a six-minute period from the East Power Houses Boiler No. 7.
	Self Report	? NO	For Informational PClassification: Moderate
	Citation:	5C THSC	Chapter 101, SubChapter F 101.201(a)(1) Chapter 382 382.085(b)
	Description	within 24	b notify the TCEQ Corpus Christi Region Office of a reportable emissions event hours after the discovery of the event.
	Self Report		For Informational Pclassifications OnModerate
	Citation:	30 TAC C	
	Description		p prevent unauthorized emissions to the atmosphere during an emissions event discovered on November 9, 2014, TCEQ/STEERS Incident No. 206288.
3	Date:	06/22/2016	(1329329)
	Self Report	? NO	For Informational P <sup>Classification</sup> : On <sup>Minor</sup>
	Citation:		Chapter 290, SubChapter D 290.46(m)
	Description		maintain the good working condition and general appearance of the system's and equipment.
4	Date:	06/30/2016	(1359128)
	Self Report	? YES	For Informational PClassification: On Moderate
	Citation:	30 TAC C	Chapter 26, SubChapter A 26.121(a) Chapter 305, SubChapter F 305.125(1)
	Description	: Failure to	o meet the limit for one or more permit parameter

Date: 07/	/20/2016 (1349141)
Self Report?	NO For Informational PClassification: On Moderate
Citation:	30 TAC Chapter 101, SubChapter A 101.20(1) 30 TAC Chapter 116, SubChapter B 116.115(c) 5C THSC Chapter 382 382.085(b)
Description:	SC 7B PERMIT Failure to maintain CEMS data to demonstrate that the calibration drift did not exceed two times the performance specifications.
Self Report?	NO Ear Informational DClassification: On Moderate
Citation:	30 TAC Chapter 101, SubChapter A 101.20(1) 40 CFR Chapter 60, SubChapter C, PT 60, SubPT G 60.72(a)(2) 5C THSC Chapter 382 382.085(b)
Description: Self Report?	Failure to complete a required monthly visible emissions observation.
Citation:	30 TAC Chapter 101, SubChapter A 101.20(1) 30 TAC Chapter 116, SubChapter B 116.115(c) 5C THSC Chapter 382 382.085(b) SC 12B PERMIT
Description:	Failure to record the HCL Tank scrubber flow rate.
Self Report?	NO For Informational PClassifications OnModerate
Citation:	30 TAC Chapter 101, SubChapter A 101.20(1) 30 TAC Chapter 116, SubChapter B 116.115(c) 5C THSC Chapter 382 382.085(b) SC 11F PERMIT
Description:	Failure to monitor two valves.
Self Report?	NO For Informational PClassification: OnModerate
Citation:	30 TAC Chapter 101, SubChapter A 101.20(1) 40 CFR Chapter 63, SubChapter C, PT 63, SubPT EEE 63.1217(a)(5)(i) 5C THSC Chapter 382 382.085(b) SC 5C PERMIT
Description:	Failure to comply with CO emissions limit.
Self Report?	
Citation:	30 TAC Chapter 101, SubChapter A 101.20(1) 30 TAC Chapter 116, SubChapter B 116.115(c) 5C THSC Chapter 382 382.085(b)
Description:	SC 6D PERMIT Failure to maintain minimum natural gas flow.
Date: 08/	/03/2016 (1349369)
Self Report?	NO For Informational PClassification: On Moderate
Citation:	30 TAC Chapter 305, SubChapter F 305.125 30 TAC Chapter 331, SubChapter D 331.64(g)(1) 40 CFR Chapter 146, SubChapter D, PT 146, SubPT G 146.68(c)(2) 40 CFR Chapter 146, SubChapter D, PT 146, SubPT G 146.68(c)(3) VII.A Operating Parameters PERMIT VIII.A Monitoring and Testing Requiremen PERMIT
Description:	Failed to perform corrosion monitoring as required.
Date: 08/	/05/2016 (1349366)
Self Report?	NO For Informational PClassification: OnModerate
Citation:	30 TAC Chapter 305, SubChapter F 305.125 30 TAC Chapter 331, SubChapter D 331.64(d) 40 CFR Chapter 146, SubChapter D, PT 146, SubPT G 146.67(f)
Description:	VIII.A Monitoring & Testing Requirements PERMIT Failed to install, use, and maintain, in proper operating condition at all times, continuous recording devices to record injection tubing pressures, injection flow rates, injection fluid temperatures, injection volumes, tubing-long string casing annulus pressure and volume, and any other data specified by the permit.
Date: 08/	/23/2016 (1338121)
Self Report?	NO For Informational PClassification: Minor
Citation:	30 TAC Chapter 305, SubChapter F 305.125(1)
	Effluent Limits & Mon. RQMTs; Pg. 2b PERMIT
Description:	Failed to maintain compliance with the permitted effluent limits.
Self Report?	NO For Informational PClassification: On Moderate
Citation: Description:	30 TAC Chapter 305, SubChapter F 305.125(1) Effluent Limits & Mon. RQMTs; Pg. 2q PERMIT Failed to prevent the unauthorized discharge of floating solids.
Self Report?	NO For Informational Classification: Moderate 30 TAC Chapter 305, SubChapter F 305.125(1)

Effluent Limits & Mon. RQMTs; Pg. 2 PERMIT Description: Failed to ensure the discharge of only non-contact cooling water, utility wastewaters, water treatment wastes, non-process area stormwater, and previously monitored effluents (process area stormwater, treated domestic wastewater, and treated groundwater).

Data: 09	/26/2016 (1240177)
Date: 08, Self Report?	V26/2016 (1349177) NO For Informational Classification: Moderate
Citation:	30 TAC Chapter 101, SubChapter A 101.20(3)
	30 TAC Chapter 116, SubChapter B 116.115(c) 30 TAC Chapter 122, SubChapter B 122.143(4)
	50 TAC Chapter 122, Subchapter B 122,145(4) 5C THSC Chapter 382 382.085(b)
	FOP No. 0-1904, STC 24 OP
Description:	NSR No. 7186, SC 20 PERMIT Failure to conduct VOC monitoring.
Self Report?	NO For Informational PClassification: On Moderate
Citation:	30 TAC Chapter 111, SubChapter A 111.111(a)(1)(B)
	30 TAC Chapter 122, SubChapter B 122.143(4) 5C THSC Chapter 382 382.085(b)
Descriptions	FOP No. O-1904, STC 3 OP
Description:	Failure to conduct an observation of a stationary vent at least once during a calendar quarter.
Self Report?	NO For Informational PClassification: On Moderate
Citation:	30 TAC Chapter 111, SubChapter A 111.111(a)(4)(A)(ii) 30 TAC Chapter 122, SubChapter B 122.143(4)
	50 THSC Chapter 382 382.085(b)
Description:	FOP No. O-1904, STC 1 OP Failure to conduct visible emission monitoring.
Self Report?	NO For Informational Classification: On Minor
Citation:	30 TAC Chapter 101, SubChapter A 101.20(3)
	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 No. O-1904, STC 24 OP NSR No. 7186, SC 17 PERMIT
Description:	Failure to prevent fugitive emissions from Open Ended Lines (OEL).
Self Report?	NO For Informational PClassification: OnModerate
Citation:	30 TAC Chapter 101, SubChapter A 101.20(3) 30 TAC Chapter 116, SubChapter B 116.115(c)
	30 TAC Chapter 122, SubChapter B 122.143(4)
	40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.168(d)(2) 40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.174(b)(3)(i)
	5C THSC Chapter 382 382.085(b)
	FOP No. O-1904, STC 1A OP FOP No. O-1904, STC 24 OP
Description	NSR No. 7186, SC 17 PERMIT
Description:	Failure to monitor valves and connectors for fugitive emissions.
	/30/2016 (1349175)
Self Report?	
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 No. 0-1415 STC 17 OP
	NSR No. 810, SC1 PERMIT
Description: Self Report?	Failure to prevent the exceedance of the Maximum Allowable Emission Rates.
Citation:	NO For Informational Classification: Or Moderate 30 TAC Chapter 116, SubChapter B 116.116
	30 TAC Chapter 122, SubChapter B 122.143(4)
	5C THSC Chapter 382 382.085(b) FOP No. O-1415, SC 17 OP
Description:	Failure to comply with the representations and conditions of FOP No. 0-1415.
Self Report? Citation:	NO For Informational Classification: Moderate 30 TAC Chapter 116, SubChapter B 116.116(c)
	30 TAC Chapter 122, SubChapter B 122.143(4)
	5C THSC Chapter 382 382.085(b) FOP No. O-1415, STC 17 OP
	NSR No. 810, SC13 PERMIT
Description: Self Report?	Failure to conduct visible emission observations.
	NO For Informational Pclassification: OnMyderate

Citation:	30 TAC Chapter 116, SubChapter B 116.115(c) 30 TAC Chapter 122, SubChapter B 122.143(4)
Description: Self Report?	5C THSC Chapter 382 382.085(b) FOP No. O-1415, STC 17 OP NSR No. 20011, SC 8 PERMIT Failure to conduct audio, olfactory, and visual checks (AVO). NO
Citation:	NO 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 No. O-1415, STC 17 OP NSR No. 20011, SC 7E PERMIT NSR No. 810, SC 7E PERMIT
Description: Self Report? Citation:	Failure to prevent fugitive emissions from Open Ended Lines (OEL). NO Classification: Moderate 30 TAC Chapter 106, SubChapter S 106.433(4)(B) 30 TAC Chapter 122, SubChapter B 122.143(4) 5C THSC Chapter 382 382.085(b)
Description: Self Report? Citation:	FOP No. O-1415, STC 18 OP Failure to prevent the exceedance of the Maximum Allowable Emission Rates. NO For Informational Classification: Moderate 30 TAC Chapter 122, SubChapter B 122.143(4) 30 TAC Chapter 122, SubChapter B 122.145(2)(B) 5C THSC Chapter 382 382.085(b)
Description:	Failure to report all instances of a deviation.
	31/2016 (1355247)
Self Report? Citation:	NO For Informational Classification: Minor 30 TAC Chapter 116, SubChapter B 116.116(a) 30 TAC Chapter 122, SubChapter B 122.143(4) 5C THSC Chapter 382 382.085(b) SC 1 PERMIT STC 17 OP
Description: Self Report?	Failure to comply with the requirements listed in an applicable state permit.
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) GC 1 PERMIT STC 17 OP
Description: Self Report?	Failure to comply with the requirements listed in an applicable state permit.
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) GC 5 PERMIT STC 17 OP
Description: Self Report?	Failure to perform sampling for natural gas sulfur content. NO For Informational PClassification: 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) GC 10 PERMIT STC 17 OP
Description: Self Report?	Failure to perform monitoring on two connectors. NO For Informational PClassification: 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 63, SubChapter C, PT 63, SubPT H 63.167(a)(1) 5C THSC Chapter 382 382.085(b) GC 10 PERMIT STC 17 PERMIT
Description: Self Report? Citation:	Failure to prevent fugitive emissions from Open Ended Lines (OEL). NO 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) SC 1 PERMIT STC 17 PERMIT
Description:	Failure to comply with the requirements listed in an applicable state permit.

Self Report? Citation:	NO For Informational Classification: OMinor 30 TAC Chapter 111, SubChapter A 111.111(a)(8)(B)(i)
	30 TAC Chapter 122, SubChapter B 122.143(4) 5C THSC Chapter 382 382.085(b) STC 3B(ii) PERMIT
Description: Self Report?	Failure to perform visible emissions evaluations. NO For Informational Pclassification: 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) SC 5 PERMIT STC 17 PERMIT
Description: Self Report?	Failure to comply with the requirements listed in an applicable state permit.
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) SC 1 PERMIT STC 17 OP
Description:	Failure to comply with the requirements listed in an applicable state permit.
Self Report? Citation:	NO 30 TAC Chapter 116, SubChapter B 116.115(b)(2)(F) 30 TAC Chapter 116, SubChapter B 116.116(a) 30 TAC Chapter 122, SubChapter B 122.143(4) 5C THSC Chapter 382 382.085(b) SC 1 PERMIT STC 17 OP
Description: Self Report?	Failure to comply with the requirements listed in an applicable state permit.
Citation:	NO For Informational Classification: Onlinor 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) SC 17B PERMIT STC 17 OP
Description: Self Report?	Failure to conduct audio, olfactory, and visual checks (AVO). NO For Informational Pclassification: 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) SC 8C PERMIT STC 17 OP
Description:	Failure to comply with the requirements listed in an applicable state permit.
Self Report? Citation:	NO Classification: Minor 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) SC 1 PERMIT STC 17 OP
Description:	Failure to comply with the requirements listed in an applicable state permit.
Date: 09/3	30/2016 (1357771)
Self Report?	NO For Informational PClassification: On Moderate
Citation:	30 TAC Chapter 101, SubChapter A 101.20(3) 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) NSR 7186b & PSDTX1079M1 (SC) (1) PERMIT
Description:	Failure to prevent unauthorized emissions to the atmosphere during an emission event, Incident No. 240550 that occurred on August 1, 2016.
Date: 11/2	29/2016 (1370328)
Self Report?	NO For Informational Plassification: OnModerate
Citation:	30 TAC Chapter 101, SubChapter A 101.20(3) 30 TAC Chapter 116, SubChapter B 116.115(c) 5C THSC Chapter 382 382.085(b) NSR PERMIT Descrit DERMIT
Description:	Permit PERMIT Failure to prevent unauthorized emissions to the atmosphere during an emissions event that occurred on June 23, 2016 through June 26, 2016, TCEQ Incident No. 236240. Specifically, Invista released 10,791 lbs. of volatile organic compounds (VOC), 796.61 lbs. of carbon monoxide, 15.01 lbs. of nitrogen oxides, 38.28 lbs.

12

of ammonia to the atmosphere and exceeded an opacity limit by 36 percent during the incident which was determined to be caused by operator error.

	incluent which was determined to be eaused by operator error.
Date: 12,	/16/2016 (1357800)
Self Report? Citation:	NO 30 TAC Chapter 101, SubChapter F 101.201(a)(1) 30 TAC Chapter 122, SubChapter B 122.143(4) 5C THSC Chapter 382 382.085(b)
Description:	Federal Operating Permit No. 0-1415 OP Failure to notify the TCEQ Corpus Christi Region Office of a reportable emission event within 24 hours after the discovery of the event. Specifically, an emission event, Texas Commission on Environmental Quality (TCEQ)/State of Texas Environmental Electronic Reporting System (STEERS) Incident No. 199758, was discovered on May 15, 2014 at 04:08 hours; however, INVISTA SARL reported the event to the TCEQ Region Office on June 13, 2014 at 16:19 hours which was 28 days after the 24-hour deadline.
Self Report? Citation:	NO For Informational PClassification: Moderate 30 TAC Chapter 116, SubChapter B 116.110(a)
	5C THSC Chapter 382 382.085(b)
Description:	Failure to prevent unauthorized emissions to the atmosphere during an emission event that was discovered on May 15, 2014, TCEQ/STEERS Incident No. 199758. Specifically, INVISTA SARL released unauthorized emissions in the amount of 99.93 pounds of benzene from the outlying area (OLA). The event lasted 1 hour, 42 minutes. The OLA does not have a specific authorization.The event did not meet the affirmative defense due to failure to comply with reporting requirements.
Date: 01,	/16/2017 (1370561)
Self Report?	NO For Informational PClassification: On Moderate
Citation:	30 TAC Chapter 101, Subchapter F 101.201(C)
Description:	5C THSC Chapter 382 382.085(b) Failure to notify the TCEQ Corpus Christi Region Office of a reportable emissions event within 24 hours after the discovery of the event.
Self Report?	NO For Informational PClassification: Omoderate
Citation:	30 TAC Chapter 111, SubChapter A 111.111(a)(1)(B) 30 TAC Chapter 116, SubChapter B 116.115(c) 5C THSC Chapter 382 382.085(b) SC 3 PERMIT
Description:	Failure to prevent visible emissions with opacity greater than a limit of 20 percent (%) averaged over a six-minute period from the West Power Houses Boiler No. 1.
Self Report?	NO For Informational PClassification: On Moderate
Citation:	30 TAC Chapter 101, SubChapter F 101.201(c) 5C THSC Chapter 382 382.085(b)
Description:	Failure to submit a copy of the final record to the applicable commission office no later than two weeks after the end of the maintenance activity.
Self Report?	NO For Informational PClassification: OnModerate
Citation:	30 TAC Chapter 111, SubChapter A 111.111(a)(1)(B) 30 TAC Chapter 116, SubChapter B 116.115(c) 5C THSC Chapter 382 382.085(b) SC 3 PERMIT
Description:	Failure to prevent visible emissions with opacity greater than a limit of 20 percent (%) averaged over a six-minute period from the East Power Houses Boiler No. 7.
Self Report?	NO For Informational PClassifications OnModerate
Citation:	30 TAC Chapter 101, SubChapter F 101.201(a)(1) 5C THSC Chapter 382 382.085(b) Failure to patific the TCFO Course Christi Paries Office of a monotoble emission event
Description:	Failure to notify the TCEQ Corpus Christi Region Office of a reportable emissions event within 24 hours after the discovery of the event.
Self Report?	NO For Informational PClassification: On Moderate
Citation:	30 TAC Chapter 116, SubChapter B 116.115(b) 30 TAC Chapter 116, SubChapter B 116.115(c) 5C THSC Chapter 382 382.085(b) GC 8 PERMIT SC 1 PERMIT
Description:	Failure to prevent unauthorized emissions to the atmosphere during an emissions event that was discovered on November 9, 2014, TCEQ/STEERS Incident No. 206288.
Date: 01	(20/2017 (1370030)
Date: 01, Self Report?	V20/2017 (1370039) NO Ear Informational Classification: Moderate
Citation:	30 TAC Chapter 305, SubChapter F 305.125 30 TAC Chapter 335, SubChapter H 335.221(a)(6)

Compliance History Report for CN602582231, RN102663671, Rating Year 2020 which includes Compliance History (CH) components from January 11, 2016, through January 11, 2021. Page 20

30 TAC Chapter 335, SubChapter H 335.221(a)(6)

15

16

Description:	40 CFR Chapter 266, SubChapter I, PT 266, SubPT H 266.102(e)(8)(iii) PP.II.A. Duty to Comply PERMIT PP.III.D. General Inspection Requirement PERMIT Failed to follow the inspection schedule contained in the permit application submittals identified in Provision I.B, and as set out in Table III.D Inspection Schedule.
	/28/2017 (1411128)
Self Report? Citation:	YES 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
Date: 03/	/14/2017 (1357499)
Self Report?	NO For Informational PClassifications On Minor
Citation:	30 TAC Chapter 101, SubChapter F 101.201(a)(1) 30 TAC Chapter 122, SubChapter B 122.143(4) 5C THSC Chapter 382 382.085(b) GTC OP STC 2F OP
Description:	Failure to notify the TCEQ Corpus Christi Office of a reportable event within 24 hours after the discovery. Specifically, Invista Sarl failed to submit in a timely manner two initial notifications for two reportable events (TCEQ/STEERS Incident Nos. 214165 and 229122).
Self Report?	NO For Informational PClassification: Or Moderate
Citation:	30 TAC Chapter 101, SubChapter A 101.20(3) 30 TAC Chapter 116, SubChapter B 116.115(b)(2)(F) 30 TAC Chapter 122, SubChapter B 122.143(4) 5C THSC Chapter 382 382.085(b) SC 1 PA
Description:	STC 15 OP Failure to prevent unauthorized emissions to the atmosphere during a reportable emissions event, Incident 214165 that occurred on 05/09/15 at 15:17 hrs. Specifically, Invista Sarl released from the OP-1-Low Pressure Scrubber Vent (EPN 06VNT-001) and OP-1 High Pressure Scrubber Vent (EPN 06VNT-002) the following contaminants and total amounts: 18,102 lbs of cyclohexene and 3.44 lbs of benzene. The event occurred for duration of 127 hrs, 48 mins. The event did not meet the affirmative defense.
Self Report?	NO For Informational PClassification: On Moderate
Citation:	30 TAC Chapter 111, SubChapter A 111.111(a)(1)(B) 30 TAC Chapter 116, SubChapter B 116.115(b) 30 TAC Chapter 122, SubChapter B 122.143(4) 5C THSC Chapter 382 382.085(b) SC 3 PERMIT STC 15 OP STC 3 OP
Description:	Failure to prevent visible emissions with opacity greater than 20% averaged over a six-minute period. Specifically, Invista Sarl released 41.52% opacity from the West Power House Stack for Boilers 1 & 2 (EPN 15STK-005) during an event, Incident No. 229122, which was discovered on 03/12/16 at 00:24 hours for duration of 6 mins. The event was due to operator error, and notification for this event was not submitted to the TCEQ in a timely manner. This event does not meet the affirmative defense.
Self Report?	NO For Informational PClassification: On Moderate
Citation:	[7186/PSD-TX-1079M1] SC 1 PA 30 TAC Chapter 101, SubChapter A 101.20(3) 30 TAC Chapter 116, SubChapter B 116.115(b) 30 TAC Chapter 122, SubChapter B 122.143(4) 5C THSC Chapter 382 382.085(b) STC 15 OP
Description:	Failure to prevent unauthorized emissions to the atmosphere during a reportable emissions event, TCEQ/STEERS Incident No. 232412, which was discovered on April 28, 2016 at 13:18 hours. Specifically, Invista Sarl released 25.33 lbs of hydrogen cyanide, 196.89 lbs of ammonia, 513.15 lbs of carbon monoxide, 62.07 lbs of nitrogen oxides, 0.8 lbs of sulfur dioxide, 3.9 lbs of unspeciated VOC from the ADN Facility (EPNs 10FLR002, 10FLR004, 10FLR001, 10FLR005, 10FLR003A, and 10FLR003). The event occu
Self Report?	NO For Informational PClassification: On Moderate
Citation:	[7186/PSD-TX-1079M1] SC 1 PA 30 TAC Chapter 101, SubChapter A 101.20(3) 30 TAC Chapter 116, SubChapter B 116.115(b) 30 TAC Chapter 122, SubChapter B 122.143(4)

17

18

Description:	5C THSC Chapter 382 382.085(b) GTC OP STC 15 OP Failure to prevent unauthorized emissions to the atmosphere during a reportable emissions event, Incident No. 235220, which was discovered on 06/08/16 at 10:58 hours. Specifically, Invista Sarl released 1,491.48 lbs of ammonia and 4.57 lbs of unspeciated VOC from EPN 10FLR-004. The event occurred for duration of 47 minutes. The unauthorized emissions were not beyond the control of the owner/operator, and could have been avoided, and therefore, does not meet the affirmative defense.	
Self Report? Citation:	NO For Informational Classification: Moderate 30 TAC Chapter 101, SubChapter A 101.20(3) 30 TAC Chapter 116, SubChapter B 116.115(b) 30 TAC Chapter 122, SubChapter B 122.143(4) 5C THSC Chapter 382 382.085(b) 7186 [PSD-TX-1079M1] SC7(B) PA	
Description:	FOP O-1867 GTC OP FOP O-1867 STC 15 OP Failure to operate the Ammonia Startup Flare with a flame present at all times and/or have a constant pilot flame. Specifically, on June 8, 2016, between 10:58 hours and 11:45 hours, a build-up of water from the ammonia recycle/feed preparation system caused the Ammonia Startup Flare (EPN 10FLR-004) pilots to go out while ammonia and supplemental natural gas were being routed to the flare.	
Date: 04,	/19/2017 (1402112)	
Self Report? Citation:	NO 30 TAC Chapter 305, SubChapter F 305.125 30 TAC Chapter 331, SubChapter D 331.64(g)(1) 40 CFR Chapter 146, SubChapter D, PT 146, SubPT G 146.68(c)(2) 40 CFR Chapter 146, SubChapter D, PT 146, SubPT G 146.68(c)(3)	
Description:	PP.VIII.A Monitoring and Testing Require PERMIT Failed to perform corrosion monitoring as required.	
	/19/2017 (1402109)	
Self Report?	NO For Informational PClassifications On Moderate	
Citation: Description:	30 TAC Chapter 305, SubChapter F 305.125 30 TAC Chapter 331, SubChapter D 331.64(g)(1) 40 CFR Chapter 146, SubChapter D, PT 146, SubPT G 146.68(c)(2) 40 CFR Chapter 146, SubChapter D, PT 146, SubPT G 146.68(c)(3) PP.VIII.A Monitoring and Testing Require PERMIT Failed to perform corrosion monitoring as required.	
·	/26/2017 (1409010)	
Self Report?	NO For Informational PClassification: On <sup>Moderate</sup>	
Citation:	30 TAC Chapter 101, SubChapter A 101.20(3) 30 TAC Chapter 116, SubChapter B 116.115(b)(2)(F) 30 TAC Chapter 116, SubChapter B 116.115(c) 5C THSC Chapter 382 382.085(b) NSR PERMIT	
Description:	PSD PERMIT Failure to prevent unauthorized emission to the atmosphere during an emissions event that was discovered on March 3, 2017, TCEQ/STEERS Incident No. 253703. Specifically, Invista SARL, released unauthorized emissions in the amount of 2892 lbs of ammonia, 37 lbs of hexamethlenediamine, 5 lbs of unspeciated VOC, and 13 lbs of other organics from EPN 04VNT-007. The event lasted 23 minutes. Permit No. 23271's 6.75 lb/hr limit for ammonia, 0.01 lb/hr limit for VOC (as noted on the MAERT) were exceeded	
Date: 06,	/30/2017 (1439832)	
Self Report?	YES For Informational PClassification: 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	
	/07/2017 (1422568)	
Self Report? Citation:	NO For Informational Classification: Moderate 30 TAC Chapter 111, SubChapter A 111.111(a)(1)(C) 30 TAC Chapter 116, SubChapter B 116.115(c) 5C THSC Chapter 382 382.085(b) SC No. 3 PERMIT	

Description: Failure to prevent visible emissions with opacity greater than a limit of 10% averaged over a six-minute period from EPN 14STK-001. Specifically, Invista SARL released visible emissions with 46.6% opacity from EPN 14STK-001 during an event that was discovered on December 2, 2016, TCEQ/STEERS Incident No. 248035. The opacity event lasted 12 minutes. Opacity was measured by a continuous opacity monitoring system (COMS). The unauthorized opacity was the result of operator error.

24

25

	NO For Informational PClassification: OnModerate
Citation:	1902 STC 21 OP
	23271 SC1 PERMIT
	30 TAC Chapter 116, SubChapter B 116.115(a) 30 TAC Chapter 122, SubChapter B 122.143(4)
	50 TAC Chapter 122, Subchapter B 122.145(4) 5C THSC Chapter 382 382.085(b)
Description:	Failure to comply with the hourly maximum fill rate requirements listed in an applica state permit. Specifically, Invista exceeded the hourly maximum fill rate permit representations 18 times from May 1, 2016 and April 30, 2017 for the Refined HMI
	Tank, Big A Crude HMD Tank, Big B Crude HMD Tank, Self Leachate Tank, Wet Organ
	Tank, Misc. Slurries Sump, and East BZ Receiver.
Self Report?	NO For Informational PClassification: OnModerate
Citation:	23271 SC 5 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)
Description:	Failure to comply with the NOx emissions factor requirements listed in an applicable state permit. Specifically, Invista exceeded the emissions factor of 0.06 pounds of N per MMBtu while firing rates were greater than 130 MMBtu for the Hydrogen Reform Unit eleven (11) times from May 1, 2016 through April 30, 2017.
Self Report?	NO For Informational PClassification: On Moderate
Citation:	1902 STC SAFERIN
	30 TAC Chapter 111, SubChapter A 111.111(a)(8)(B)(i) 30 TAC Chapter 122, SubChapter B 122.143(4)
	5C THSC Chapter 382 382.085(b)
Description:	Failure to perform visible emissions evaluations. Specifically, Invista failed to perform
	Method 9 visible emissions evaluations from July 1, 2016 through September 30, 20 on the Water Pump Engine and from April 1, 2016 through June 30, 2016 on the Fir Pump Engine.
Self Report?	NO For Informational PClassification: OnModerate
Citation:	1902 STC 17 OP
	23271 SC1 PERMIT
	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 63, SubChapter C, PT 63, SubPT H 63.167(a)(1)
	5C THSC Chapter 382 382.085(b)
Description:	5C THSC Chapter 382 382.085(b)
Description: Self Report?	5C THSC Chapter 382 382.085(b) Failure to prevent fugitive emissions from Open Ended Lines (OEL). Specifically, Invi discovered seven open ended lines from May 1, 2016 through April 30, 2017.
·	<ul> <li>5C THSC Chapter 382 382.085(b)</li> <li>Failure to prevent fugitive emissions from Open Ended Lines (OEL). Specifically, Invidiscovered seven open ended lines from May 1, 2016 through April 30, 2017.</li> <li>NO For Informational PClassification: OnModerate 23271 SC 9 PERMIT</li> </ul>
Self Report?	<ul> <li>5C THSC Chapter 382 382.085(b)</li> <li>Failure to prevent fugitive emissions from Open Ended Lines (OEL). Specifically, Invidiscovered seven open ended lines from May 1, 2016 through April 30, 2017.</li> <li>NO For Informational PClassification: OnModerate 23271 SC 9 PERMIT 30 TAC Chapter 116, SubChapter B 116.115(b)(2)(C)</li> </ul>
Self Report?	<ul> <li>5C THSC Chapter 382 382.085(b)</li> <li>Failure to prevent fugitive emissions from Open Ended Lines (OEL). Specifically, Invidiscovered seven open ended lines from May 1, 2016 through April 30, 2017.</li> <li>NO For Informational Pclassification: One Moderate 23271 SC 9 PERMIT</li> <li>30 TAC Chapter 116, SubChapter B 116.115(b)(2)(C)</li> <li>30 TAC Chapter 122, SubChapter B 122.143(4)</li> </ul>
Self Report?	<ul> <li>5C THSC Chapter 382 382.085(b)</li> <li>Failure to prevent fugitive emissions from Open Ended Lines (OEL). Specifically, Invidiscovered seven open ended lines from May 1, 2016 through April 30, 2017.</li> <li>NO</li> <li>For Informational Pclassification: Official operation of the second seven open ended lines from May 1, 2016 through April 30, 2017.</li> <li>NO</li> <li>For Informational Pclassification: Official operation of the second seven open ended lines from May 1, 2016 through April 30, 2017.</li> <li>NO</li> <li>For Informational Pclassification: Official operation of the second seven open ended lines from May 1, 2016 through April 30, 2017.</li> <li>NO</li> <li>For Informational Pclassification: Official operation operation operation operation operation operation operation.</li> <li>Specifically, Invision operation.</li> </ul>
Self Report? Citation :	<ul> <li>5C THSC Chapter 382 382.085(b)</li> <li>Failure to prevent fugitive emissions from Open Ended Lines (OEL). Specifically, Invidiscovered seven open ended lines from May 1, 2016 through April 30, 2017.</li> <li>NO For Informational Pclassification: Official Moderate 23271 SC 9 PERMIT</li> <li>30 TAC Chapter 116, SubChapter B 116.115(b)(2)(C)</li> <li>30 TAC Chapter 122, SubChapter B 122.143(4)</li> <li>5C THSC Chapter 382 382.085(b)</li> </ul>
Self Report? Citation: Description:	<ul> <li>5C THSC Chapter 382 382.085(b)</li> <li>Failure to prevent fugitive emissions from Open Ended Lines (OEL). Specifically, Invisidiscovered seven open ended lines from May 1, 2016 through April 30, 2017.</li> <li>NO</li> <li>For Informational Pclassification: Official operation of the second seven open ended lines from May 1, 2016 through April 30, 2017.</li> <li>NO</li> <li>For Informational Pclassification: Official operation of the second seven open ended lines from May 1, 2016 through April 30, 2017.</li> <li>NO</li> <li>For Informational Pclassification: Official operation operation operation operation operation for the second seven open ended lines from May 1, 2016 through April 30, 2017.</li> <li>NO</li> <li>For Informational Pclassification: Official operation operation operation for the second seven operation operation seven times failed to record when the baghouse EPN: 11BAG311 was in operation seven operation seven operation seven operation operation seven operation seven operation operation seven operation seven operation seven operation operation seven opera</li></ul>
Self Report? Citation: Description: Date: 07/	<ul> <li>SC THSC Chapter 382 382.085(b)</li> <li>Failure to prevent fugitive emissions from Open Ended Lines (OEL). Specifically, Invidiscovered seven open ended lines from May 1, 2016 through April 30, 2017.</li> <li>NO For Informational PClassification: One Moderate 23271 SC 9 PERMIT</li> <li>30 TAC Chapter 116, SubChapter B 116.115(b)(2)(C)</li> <li>30 TAC Chapter 122, SubChapter B 122.143(4)</li> <li>SC THSC Chapter 382 382.085(b)</li> <li>Failure to adequately record when the baghouse was in operation. Specifically, Invisifailed to record when the baghouse EPN: 11BAG311 was in operation sixteen times from May 1, 2016 through April 30, 2017.</li> <li>/28/2017 (1420813)</li> </ul>
Self Report? Citation: Description: Date: 07/	<ul> <li>SC THSC Chapter 382 382.085(b)</li> <li>Failure to prevent fugitive emissions from Open Ended Lines (OEL). Specifically, Invidiscovered seven open ended lines from May 1, 2016 through April 30, 2017.</li> <li>NO</li> <li>For Informational PClassification: One Moderate 23271 SC 9 PERMIT</li> <li>30 TAC Chapter 116, SubChapter B 116.115(b)(2)(C)</li> <li>30 TAC Chapter 122, SubChapter B 122.143(4)</li> <li>SC THSC Chapter 382 382.085(b)</li> <li>Failure to adequately record when the baghouse was in operation. Specifically, Invisifailed to record when the baghouse EPN: 11BAG311 was in operation sixteen times from May 1, 2016 through April 30, 2017.</li> <li>/28/2017 (1420813)</li> <li>NO</li> <li>For Informational PClassification: One Moderate 30 TAC Chapter 101, SubChapter A 101.20(2)</li> </ul>
Self Report? Citation: Description: Date: 07/ Self Report?	<ul> <li>SC THSC Chapter 382 382.085(b)</li> <li>Failure to prevent fugitive emissions from Open Ended Lines (OEL). Specifically, Invidiscovered seven open ended lines from May 1, 2016 through April 30, 2017.</li> <li>NO</li> <li>For Informational PClassification: Onderate 23271 SC 9 PERMIT</li> <li>30 TAC Chapter 116, SubChapter B 116.115(b)(2)(C)</li> <li>30 TAC Chapter 122, SubChapter B 122.143(4)</li> <li>SC THSC Chapter 382 382.085(b)</li> <li>Failure to adequately record when the baghouse was in operation. Specifically, Invis failed to record when the baghouse EPN: 11BAG311 was in operation sixteen times from May 1, 2016 through April 30, 2017.</li> <li>/28/2017 (1420813)</li> <li>NO</li> <li>For Informational PClassification: Onderate 30 TAC Chapter 101, SubChapter A 101.20(2) 30 TAC Chapter 116, SubChapter B 116.115(c)</li> </ul>
Self Report? Citation: Description: Date: 07/ Self Report?	SC THSC Chapter 382 382.085(b) Failure to prevent fugitive emissions from Open Ended Lines (OEL). Specifically, Invi discovered seven open ended lines from May 1, 2016 through April 30, 2017. NO For Informational PClassification: One 23271 SC 9 PERMIT 30 TAC Chapter 116, SubChapter B 116.115(b)(2)(C) 30 TAC Chapter 122, SubChapter B 122.143(4) 5C THSC Chapter 382 382.085(b) Failure to adequately record when the baghouse was in operation. Specifically, Invis- failed to record when the baghouse EPN: 11BAG311 was in operation sixteen times from May 1, 2016 through April 30, 2017. /28/2017 (1420813) NO For Informational PClassification: One 30 TAC Chapter 101, SubChapter A 101.20(2) 30 TAC Chapter 116, SubChapter B 116.115(c) 30 TAC Chapter 122, SubChapter B 122.143
Self Report? Citation: Description: Date: 07/ Self Report?	<ul> <li>SC THSC Chapter 382 382.085(b)</li> <li>Failure to prevent fugitive emissions from Open Ended Lines (OEL). Specifically, Invidiscovered seven open ended lines from May 1, 2016 through April 30, 2017.</li> <li>NO</li> <li>For Informational PClassification: One Moderate 23271 SC 9 PERMIT</li> <li>30 TAC Chapter 116, SubChapter B 116.115(b)(2)(C)</li> <li>30 TAC Chapter 122, SubChapter B 122.143(4)</li> <li>SC THSC Chapter 382 382.085(b)</li> <li>Failure to adequately record when the baghouse was in operation. Specifically, Invisifailed to record when the baghouse EPN: 11BAG311 was in operation sixteen times from May 1, 2016 through April 30, 2017.</li> <li>/28/2017 (1420813)</li> <li>NO</li> <li>For Informational PClassification: One Moderate 30 TAC Chapter 101, SubChapter A 101.20(2)</li> <li>30 TAC Chapter 116, SubChapter B 116.115(c)</li> </ul>
Self Report? Citation: Description: Date: 07/ Self Report?	SC THSC Chapter 382 382.085(b) Failure to prevent fugitive emissions from Open Ended Lines (OEL). Specifically, Invi discovered seven open ended lines from May 1, 2016 through April 30, 2017. NO For Informational PClassification: Moderate 23271 SC 9 PERMIT 30 TAC Chapter 116, SubChapter B 116.115(b)(2)(C) 30 TAC Chapter 122, SubChapter B 122.143(4) 5C THSC Chapter 382 382.085(b) Failure to adequately record when the baghouse was in operation. Specifically, Invis failed to record when the baghouse EPN: 11BAG311 was in operation sixteen times from May 1, 2016 through April 30, 2017. /28/2017 (1420813) NO For Informational Classification: Moderate 30 TAC Chapter 101, SubChapter A 101.20(2) 30 TAC Chapter 116, SubChapter B 116.115(c) 30 TAC Chapter 116, SubChapter B 112.143 40 CFR Chapter 63, SubChapter C, PT 63, SubPT EEE 63.1217(a)(5)(i) 5C THSC Chapter 382 382.085(b) 812, SC 5C PERMIT
Self Report? Citation: Description: Date: 07/ Self Report?	SC THSC Chapter 382 382.085(b) Failure to prevent fugitive emissions from Open Ended Lines (OEL). Specifically, Invi discovered seven open ended lines from May 1, 2016 through April 30, 2017. NO For Informational PClassification: Moderate 23271 SC 9 PERMIT 30 TAC Chapter 116, SubChapter B 116.115(b)(2)(C) 30 TAC Chapter 122, SubChapter B 122.143(4) SC THSC Chapter 382 382.085(b) Failure to adequately record when the baghouse was in operation. Specifically, Invisi failed to record when the baghouse EPN: 11BAG311 was in operation sixteen times from May 1, 2016 through April 30, 2017. /28/2017 (1420813) NO For Informational Classification: Moderate 30 TAC Chapter 101, SubChapter A 101.20(2) 30 TAC Chapter 116, SubChapter B 116.115(c) 30 TAC Chapter 122, SubChapter B 122.143 40 CFR Chapter 63, SubChapter C, PT 63, SubPT EEE 63.1217(a)(5)(i) SC THSC Chapter 382 382.085(b) 812, SC 5C PERMIT Failure to comply with carbon monoxide (CO) emissions limit as specified by 40 Cod
Self Report? Citation: Description: Date: 07/ Self Report? Citation:	SC THSC Chapter 382 382.085(b) Failure to prevent fugitive emissions from Open Ended Lines (OEL). Specifically, Invisid discovered seven open ended lines from May 1, 2016 through April 30, 2017. NO For Informational PClassification: One Moderate 23271 SC 9 PERMIT 30 TAC Chapter 116, SubChapter B 116.115(b)(2)(C) 30 TAC Chapter 122, SubChapter B 122.143(4) 5C THSC Chapter 382 382.085(b) Failure to adequately record when the baghouse was in operation. Specifically, Invist failed to record when the baghouse EPN: 11BAG311 was in operation sixteen times from May 1, 2016 through April 30, 2017. /28/2017 (1420813) NO For Informational Classification: One Moderate 30 TAC Chapter 101, SubChapter A 101.20(2) 30 TAC Chapter 116, SubChapter B 116.115(c) 30 TAC Chapter 116, SubChapter B 112.143 40 CFR Chapter 63, SubChapter C, PT 63, SubPT EEE 63.1217(a)(5)(i) 5C THSC Chapter 382 382.085(b)

Compliance History Report for CN602582231, RN102663671, Rating Year 2020 which includes Compliance History (CH) components from January 11, 2016, through January 11, 2021.

Page 23

	30 TAC Chapter 122, SubChapter B 122.143
	5C THSC Chapter 382 382.085(b)
Description:	812 SC 12A PERMIT Failure to record the HCL Tank scrubber flow rate. Specifically, Invista failed to record the HCL Tank scrubber flow rate on three days between March 19, 2016 and July 2,
Self Report?	2016. NO For Informational P <sup>Classification</sup> : On <sup>Moderate</sup>
Citation:	30 TAC Chapter 101, SubChapter A 101.20(2)
	30 TAC Chapter 116, SubChapter B 116.115(c) 40 CFR Chapter 61, SubChapter C, PT 61, SubPT FF 61.354(d) 40 CFR Chapter 61, SubChapter C, PT 61, SubPT FF 61.356(j)(10)
Description:	5C THSC Chapter 382 382.085(b) Failure to record the monitoring time for the Distillate Dumpster Carbon Adsorber. Specifically, Invista failed to record the time the adsorber was monitored on February 2, 2016.
Date: 08,	/31/2017 (1429815)
Self Report?	NO For Informational PClassification: OnModerate
Citation:	30 TAC Chapter 101, SubChapter A 101.20(3)
	30 TAC Chapter 113, SubChapter C 113.100 30 TAC Chapter 116, SubChapter B 116.115(c)
	30 TAC Chapter 122, SubChapter B 122.143(4)
	30 TAC Chapter 122, SubChapter C 122.210(a) 40 CFR Chapter 63, SubChapter C, PT 63, SubPT A 63.6(e)(3)
	5C THSC Chapter 382 382.085(b)
	PERMIT 1904, FOP No. O-1904, STC 10 OP
	PERMIT 1904, FOP No. O-1904, STC 11 OP PERMIT 1904, FOP No. O-1904, STC 1E OP
	PERMIT 1904, FOP No. O-1904, STC 29 OP
Description:	PERMIT 7186, NSR No. 7186, SC 4 PERMIT Failure to update the startup, shutdown, and malfunction plan (SSMP).
Self Report?	NO For Informational Pclassification: Moderate
Citation:	30 TAC Chapter 101, SubChapter A 101.20(3)
	30 TAC Chapter 116, SubChapter B 116.115(c) 30 TAC Chapter 116, SubChapter B 116.116
	30 TAC Chapter 122, SubChapter B 122.143(4)
	5C THSC Chapter 382 382.085(b)
	PERMIT 1904, FOP No. O-1904, STC 24 OP PERMIT 7186, NSR No. 7186, SC 1 PERMIT
Description:	Failure to comply with representations and conditions of FOP No. O-1904.
Self Report?	NO For Informational Pclassification: OnModerate
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)
Description	PERMIT 1904, FOP No. O-1904, STC 1A OP Failure to conduct visible emission monitoring.
Description: Self Report?	NO For Informational PClassification: OMinor
Citation:	30 TAC Chapter 101, SubChapter A 101.20(3)
	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)
	PERMIT 1904, FOP No. O-1904, STC 1A OP
	PERMIT 1904, FOP No. O-1904, STC 29 OP PERMIT 7186, NSR No. 7186, SC 17E PERMIT
Description:	Failure to prevent fugitive emissions from Open Ended Lines (OEL).
Self Report?	NO For Informational PClassification: On Moderate
Citation:	30 TAC Chapter 101, SubChapter F 101.201(b) 30 TAC Chapter 122, SubChapter B 122.143(4)
	50 THSC Chapter 382 382.085(b)
D	PERMIT 1904, FOP No. O-1904, STC 2F OP
Description:	Failure to create a final record of all reportable and non-reportable emissions events no later than two weeks after the end of an emissions event.
Self Report?	NO For Informational PClassification: On Moderate
Citation:	30 TAC Chapter 101, SubChapter A 101.20(3)
	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)
	PERMIT 1904, FOP No. O-1904, STC 1A OP
	PERMIT 1904, FOP No. O-1904, STC 29 OP PERMIT 7186, NSR No. 7186, SC 11 PERMIT
Description:	Failure to record liquid flow rates and pH levels for the HCL Scrubber.
Self Report?	NO For Informational Pelassification: Only
History Penart f	or CN602582231 RN102663671 Rating Year 2020 which includes Compliance History (CH) cou

Compliance History Report for CN602582231, RN102663671, Rating Year 2020 which includes Compliance History (CH) components from January 11, 2016, through January 11, 2021. Page 24

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)
Description: Self Report?	Failure to report all instances of a deviation.
Citation:	30 TAC Chapter 101, SubChapter A 101.20(3)
	30 TAC Chapter 106, SubChapter K 106.263(g)
	30 TAC Chapter 122, SubChapter B 122.143(4) 5C THSC Chapter 382 382.085(b)
	PERMIT 1904, FOP No. O-1904, STC 29 OP
Description:	Failure to maintain sufficient records for Maintenance, Start-up, and Shutdown (MSS) activities.
Self Report?	
Citation:	30 TAC Chapter 101, SubChapter A 101.20(3)
	30 TAC Chapter 116, SubChapter B 116.115(c)
	30 TAC Chapter 122, SubChapter B 122.143(4) 40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.162
	5C THSC Chapter 382 382.085(b)
	PERMIT 1904, FOP No. O-1904, STC 1A OP PERMIT 1904, FOP No. O-1904, STC 27 OP
	PERMIT 1904, FOP No. O-1904, STC 29 OP
Description:	PERMIT 7186, NSR No. 7186, SC 17F PERMIT Failure to monitor valves, connectors, and replacements for leaking components.
Description.	
Date: 12/	/11/2017 (1430479)
Self Report?	NO For Informational PClassifications On Minor
Citation:	30 TAC Chapter 101, SubChapter A 101.20(3) 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) SC 8(E) PERMIT
	STC 16 OP
Description:	Failure to equip each open-ended valve or line (OEL) with an appropriately sized cap, blind flange, plug, or a second valve to seal the line.
Self Report?	NO For Informational PClassification: OMinor
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)
	SC 7(E) PERMIT
Description:	STC 16 OP Failure to equip each open-ended valve or line (OEL) with an appropriately sized cap,
Description.	blind flange, plug, or a second valve to seal the line.
Self Report?	NO For Informational PClassifications On Moderate
Citation:	30 TAC Chapter 106, SubChapter S 106.433(8) 30 TAC Chapter 122, SubChapter B 122.143(4)
	5C THSC Chapter 382 382.085(b)
Description:	STC 16 OP Failure to maintain sufficient records of surface coat activities.
Self Report?	NO For Informational PClassification: OnModerate
Citation:	30 TAC Chapter 106, SubChapter S 106.433(7)(A)
	30 TAC Chapter 122, SubChapter B 122.143(4) 5C THSC Chapter 382 382.085(b)
	STC 16 OP
Description:	Failure to emit no more than 6 pounds per hour (lb/hr) of volatile organic compound (VOC) emissions, averaged over any five-hour period, from surface coating operations.
Self Report?	NO For Informational PClassifications OnModerate
Citation:	30 TAC Chapter 101, SubChapter F 101.201(b) 30 TAC Chapter 122, SubChapter B 122.143(4)
	5C THSC Chapter 382 382.085(b)
Description:	STC 2(F) OP Failure to create final records of non-reportable (recordable) emissions events no later
Description.	than two weeks after the end of the events.
Self Report?	NO For Informational PClassification: Moderate 30 TAC Chapter 101, SubChapter A 101.20(3)
Citation:	30 TAC Chapter 101, SubChapter A 101.20(3) 30 TAC Chapter 116, SubChapter B 116.115(c)
	5C THSC Chapter 382 382.085(b)
Description:	SC 1 PERMIT Failure to prevent unauthorized emissions to the atmosphere during non-reportable
	(recordable) emissions events.
Self Report?	NO For Informational PClassifications OnModerate
Citation:	30 TAC Chapter 101, SubChapter A 101.20(1)

	Description:	30 TAC Chapter 101, SubChapter A 101.20(3) 30 TAC Chapter 116, SubChapter B 116.115(b)(2)(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 60.7 5C THSC Chapter 382 382.085(b) GC 3 PERMIT STC 16 OP STC 2(F) OP Failure to report start of construction, construction interruptions exceeding 45 days, or completion of construction no later than 15 working days after the occurrence of the
	Self Report?	event. NO For Informational PClassification: Moderate
	Citation:	30 TAC Chapter 106, SubChapter T 106.452 30 TAC Chapter 122, SubChapter B 122.143(4) 5C THSC Chapter 382 382.085(b) STC 16 OP
	Description:	Failure to comply with the maximum filtering velocity requirements for fabric filters.
28	Date: 01/3 Self Report? Citation: Description:	31/2018(1486758)YESFor Informational Classification:Moderate2D TWC Chapter 26, SubChapter A 26.121(a)30 TAC Chapter 305, SubChapter F 305.125(1)Failure to meet the limit for one or more permit parameter
29	-	28/2018 (1490435)
	Self Report? Citation:	YES Classification: Moderate 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
30	Date: 04/: Self Report? Citation:	10/2018 (1478976) NO For Informational Classification: Moderate 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) 809 SC 12 PERMIT 812 SC 14 PERMIT
	Description:	813 SC 17 PERMIT Failure to maintain MSS emissions records. Specifically, Invista failed to maintain and sum MSS emissions records for the rolling 12-month emissions on a monthly basis from February 1, 2017 through January 31, 2018.
	Self Report?	NO Cassification 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) 809 SC 7B PERMIT
	Description:	Failure to maintain AVO records. Specifically, Invista failed to maintain AVO records for NH3 leaks within the operating area at least once in every four hour block on May 4, 2017.
	Self Report?	NO For Informational PClassification: On 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) 813 SC 12E PERMIT
	Description:	Failure to prevent fugitive emissions from Open Ended Lines (OEL). Specifically, Invista discovered three open ended lines on April 24, 2017, October 20, 2017, and September 9, 2017.
31		29/2018 (1483974)
	Self Report? Citation:	NO For Informational Classification: Moderate 2D TWC Chapter 26, SubChapter A 26.121(a)(1) 30 TAC Chapter 305, SubChapter F 305.125(1)
	Description: Self Report?	Permit Conditions; No. 2g, Pg. 7 PERMIT Failed to prevent an unauthorized discharge of wastewater or any other waste. NO For Informational Classification: Minor
	Citation:	30 TAC Chapter 305, SubChapter F 305.125(1) Monitoring Requirements; No.5, Pg. 5 PERMIT
	Description:	Failed to accurately calibrate all automatic flow measuring or recording devices and all totalizing meters for measuring flows by a trained person at plant start-up

and as often thereafter as necessary to ensure accuracy, but not less often than annually. For Informational PClassification: Self Report? NO Minor 30 TAC Chapter 305, SubChapter F 305.125(1) Citation: Monitoring Requirements No. 2, Pg. 4 PERMIT Description: Failed to accurately accomplish in a representative manner all measurements, tests and calculations. Self Report? NO DClassification: Minor rmationa 30 TAC Chapter 305, SubChapter F 305.125(1) Citation: 30 TAC Chapter 305, SubChapter F 305.125(5) Operational Requirements; No. 1, Pg. 9 PERMIT Description: Failed to ensure that the facility and all of its systems of collection, treatment, and disposal are properly operated and maintained. This includes, but is not limited to, the regular, periodic examination of wastewater solids within the treatment plant by the operator in order to maintain an appropriate quantity and quality of solids inventory as described in the various operator training manuals and according to accepted industry standards for process control. Date: 07/11/2018 (1489984)Classification: Self Report? NO Minor or Informational Citation: 23271 SC14 OP 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 63, SubChapter C, PT 63, SubPT H 63.167(a)(1) 5C THSC Chapter 382 382.085(b) Description: Failure to prevent fugitive emissions from Open Ended Lines (OEL). Specifically, Invista discovered one open ended line on August 18, 2017. or Informational Pelassifications Self Report? NO Minor 23271 SC9 OP 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) Description: Failure to adequately record all of the information required by the bag filter daily inspection sheet. Specifically, Invista failed to record the pressure differential reading for the baghouse EPN: 11BAG311 on May 9, 2017 and May 10, 2017. Self Report? NO DClassification: Minor rmationa 30 TAC Chapter 116, SubChapter B 116.115(a) Citation: 30 TAC Chapter 122, SubChapter B 122.143(4) 5C THSC Chapter 382 382.085(b) Failure to comply with the hourly maximum fill rate requirements listed in an applicable Description: state permit. Specifically, Invista exceeded the hourly maximum fill rate permit representations 10 times from May 18, 2017 through April 20, 2018 for the Refined HMI Tank, Big A Crude HMD Tank, and the Big B Crude HMD Tank. Self Report? NO DClassification: Moderate Informational Citation: 1902 ST&C 23 OP 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) Description: Failure to report all instances of deviations. Specifically, Invista did not report the exceedance of a one-time PBR authorized activity for the reporting period of May 1, 2017 through April 30, 2018. Classification: Self Report? NO Minor Informational 1902 ST&C1 OP Citation: 30 TAC Chapter 106, SubChapter K 106.261 30 TAC Chapter 106, SubChapter K 106.262 30 TAC Chapter 122, SubChapter B 122.143(4) 5C THSC Chapter 382 382.085(b) Failure to comply with the one-time permitted PBR authorized activity requirements Description: listed in a PBR. Specifically, Invista exceeded the one-time PBR authorized activity under 30 TAC §106.261 and §106.262. The PBR authorized the activity as a one-time activity with a duration not to exceed ten days. Invista subsequently determined that the activity had occurred two additional times during the reporting period of May 1, 2017 through April 30, 2018. Date: 07/16/2018 (1489978)Self Report? NO Classification: Moderate Information Citation: 30 TAC Chapter 101, SubChapter A 101.20(2) 30 TAC Chapter 101, SubChapter A 101.20(3) 30 TAC Chapter 116, SubChapter B 116.115(c)

30 TAC Chapter 122, SubChapter B 122.143(4)

40 CFR Chapter 61, SubChapter C, PT 61, SubPT FF 61.346(b)(1)

Compliance History Report for CN602582231, RN102663671, Rating Year 2020 which includes Compliance History (CH) components from January 11, 2016, through January 11, 2021. Page 27

32

33

	5C THSC Chapter 382 382.085(b) FOP 1904 ST&C 1A & 9B OP NSR 7186 SC4 OP
Description:	Failure to equip each drain with a water seal or a tightly sealed cap or plug. Specifically, On 07/18/2017 Invista found an instance of a missing cap on a BWON drain system.
Self Report? Citation:	NO For Informational Classification: Minor 30 TAC Chapter 101, SubChapter A 101.20(3) 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) NSR 7186 SC 14B OP
Description:	Failure to complete tank throughput calculations. Specifically, Invista failed to complete the tank throughput calculations for two months from June 1, 2017 through July 31, 2017.
Self Report?	NO For Informational PClassification: On 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) FOP 1904 STC 1A OP
Description:	Failure to perform visible emissions observations. Specifically, Invista failed to perform visible emissions observations fifteen (15) times from April 1, 2017 through March 31, 2018 for the ADN Operating Flare, NH3 Startup Flare, Butadiene Flare and the Cold NH3 Flare.
Self Report?	NO For Informational PClassifications On Migor
Citation:	30 TAC Chapter 101, SubChapter A 101.20(3)
	30 TAC Chapter 113, SubChapter C 113.130 30 TAC Chapter 116, SubChapter B 116.115(c)
	30 TAC Chapter 122, SubChapter B 122.143(4)
	40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.167(a)(2)
	5C THSC Chapter 382 382.085(b) FOP 1904 ST&C 1A & 28 OP
	NSR 7186 SC 17E OP
Description:	Failure to equip each open-ended line (OEL) with a cap, blind flange, plug, or second valve to seal the line. Specifically, Invista discovered fifteen (15) open ended lines from April 1, 2017 through March 31, 2018.
Date: 10/	/24/2018 (1512369)
Self Report?	NO For Informational PClassification: On Moderate
Citation:	30 TAC Chapter 101, SubChapter A 101.20(3) 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) GC PA GTC OP SC 1 PA STC 22 OP
Description:	Failure to prevent unauthorized emissions to the atmosphere during an emissions event that was discovered on 01/15/18 at 0943 hours, TCEQ/STEERS Incident No. 276473. Specifically, Invista Sarl released unauthorized emissions in the amount of 2,323.00 lbs of NH3, 1.00 lb of adiponitrile, 1.00 lb of unspeciated VOC, 1.00 lb of 1,2-diaminocyclohexane, 157.00 lbs of HMD, and 11.00 lbs of hexamethyleneimine from the HMD Synthesis Building (EPNs 04VNT007 and 04UPSET).
Date: 10/	/31/2018 (1541444)
Self Report?	YES For Informational PClassification: On 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
Date: 11/	/30/2018 (1545228)
Self Report?	
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
Date: 01/	/11/2019 (1500318)
	· ·
Self Report?	NO For Informational PClassification: On Moderate

	30 TAC Chapter 122, SubChapter B 122.143(4)
	5C THSC Chapter 382 382.085(b) STC 16 OP
Description:	Failure to maintain complete records of the actual hours of operation of each coating or stripping operation.
Self Report?	NO For Informational PClassification: On Moderate
Citation:	30 TAC Chapter 106, SubChapter T 106.452(2)(A) 5C THSC Chapter 382 382.085(b) STC 16 OP
Description:	Failure to conduct outside blast cleaning at an abrasive usage rate that does not exceed one ton per day. Specifically, INVISTA used 1.53 tons of blast material on May 2, 2017 during outside abrasive blast cleaning operations.
Self Report?	NO For Informational PClassification: OnModerate
Citation :	30 TAC Chapter 101, SubChapter A 101.20(3) 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) SC 38(A)(1) PERMIT STC 14 OP STC 16 OP
Description:	Failure to inspect any fan and verify proper operation and inspect the capture system to verify there are no cracks, holes, tears, and other defects once a year.
Self Report?	NO For Informational PClassification: On Moderate
Citation:	30 TAC Chapter 101, SubChapter A 101.20(3) 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) SC 8(E) PERMIT STC 16 OP
Description:	Failure to equip each open-ended valve or line (OEL) with an appropriately sized cap, blind flange, plug, or a second valve to seal the line.
Self Report?	NO For Informational PClassification: Moderate
Citation:	30 TAC Chapter 122, SubChapter B 122.143(4) 5C THSC Chapter 382 382.085(b) STC 15 OP
Description:	Failure to conduct and record visible emission observations once per calendar quarter.
Self Report?	NO For Informational DClassification: Moderate
Citation:	NO For Informational Classification: Moderate 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) GTCs OP
Description:	Failure to report all instances of deviations.
Date: 02/	/04/2019 (1540328)
Self Report?	NO For Informational PClassification: Or Moderate
Citation:	30 TAC Chapter 101, SubChapter A 101.20(3) 30 TAC Chapter 116, SubChapter B 116.115(b)(2)(F) 30 TAC Chapter 116, SubChapter B 116.115(c) 5C THSC Chapter 382 382.085(b)
Description:	PSDTX1416, Special Condition 1 PERMIT Failure to prevent unauthorized emissions during an emissions event that occurred on September 14, 2018; TCEQ/STEERS Incident No. 292168.
Date: 06/	/19/2019 (1557608)
Self Report?	NO For Informational PClassification: Moderate
Citation:	30 TAC Chapter 101, SubChapter F 101.201(e) 30 TAC Chapter 101, SubChapter F 101.222(d)(1) 5C THSC Chapter 382 382.085(b)
Description:	Failure to notify the TCEQ Corpus Christi Region Office of an excess opacity event within 24 hours after the discovery of the event.
Self Report?	NO For Informational PClassification: On Moderate
Citation:	30 TAC Chapter 116, SubChapter B 116.115(c) 5C THSC Chapter 382 382.085(b)
Description:	SC No. 3 PERMIT Failure to prevent excess opacity to the atmosphere during an emissions event that occurred on April 11, 2018; TCEQ/STEERS Incident No. 282672.
Date: 06/	/26/2019 (1571573)
Self Report?	NO For Informational PClassification: On Moderate
Citation:	30 TAC Chapter 305, SubChapter F 305.125

39

40

Compliance History Report for CN602582231, RN102663671, Rating Year 2020 which includes Compliance History (CH) components from January 11, 2016, through January 11, 2021.

	Description:	30 TAC Chapter 331, SubChapter D 331.64(d) 40 CFR Chapter 146, SubChapter D, PT 146, SubPT G 146.67(f) WDW029 PP.VIII. MONITORING AND TESTING PERMIT Failed to install, use, and maintain in proper operating condition at all times, continuous recording devices to record injection tubing pressures, injection flow rates, injection fluid temperatures, injection volumes, tubing-long string casing annulus pressure and volume, and any other data specified by the permit.
41	Date: 07 Self Report? Citation:	/31/2019 (1599484) YES For Informational Classification: Moderate 2D TWC Chapter 26, SubChapter A 26.121(a)
	Description:	30 TAC Chapter 305, SubChapter F 305.125(1) Failure to meet the limit for one or more permit parameter
42	Date: 08	/05/2019 (1578969)
	Self Report?	NO For Informational PClassification: On Moderate
	Citation:	30 TAC Chapter 335, SubChapter C 335.69(a) 40 CFR Chapter 262, SubChapter I, PT 262, SubPT C 262.34(a)
	Description:	Failed to obtain a permit, interim status or other authorization prior to accumulating hazardous waste for more than 90 days.
	Self Report? Citation:	NO For Informational Classification: Moderate 30 TAC Chapter 335, SubChapter C 335.69(d)(1)
		40 CFR Chapter 262, SubChapter I, PT 262, SubPT C 262.34(c)(1)(i) 40 CFR Chapter 265, SubChapter I, PT 265, SubPT I 265.171
	Description:	Failed to ensure a container holding a hazardous waste (e.g., severe rusting, apparent structural defects) is in good condition.
	Self Report?	NO For Informational Pulasification: OnModerate
	Citation:	30 TAC Chapter 335, SubChapter C 335.69(a)(1)(A) 30 TAC Chapter 335, SubChapter E 335.112(a)(8) 40 CFR Chapter 262, SubChapter I, PT 262, SubPT C 262.34(a)(1)(i) 40 CFR Chapter 265, SubChapter I, PT 265, SubPT I 265.173(a)
	Description:	Failed to ensure a container storing hazardous waste is always closed except when it is necessary to add or remove waste.
	Self Report?	NO For Informational PClassification: On Moderate
	Citation:	30 TAC Chapter 335, SubChapter C 335.69(d)(1) 40 CFR Chapter 262, SubChapter I, PT 262, SubPT C 262.34(c)(1)(i) 40 CFR Chapter 265, SubChapter I, PT 265, SubPT I 265.173(a)
	Description:	Failed to ensure a container storing hazardous waste is always closed except when it is necessary to add or remove waste.
	Self Report? Citation:	NO For Informational Pclassification: Minor 30 TAC Chapter 335, SubChapter C 335.69(e)
	Description:	40 CFR Chapter 262, SubChapter I, PT 262, SubPT C 262.34(c)(2) Failed to ensure the container holding excess amount of hazardous waste marked with the beginning date of excess accumulation.
	Self Report?	NO For Informational PClassification: Moderate
	Citation:	30 TAC Chapter 335, SubChapter C 335.69(a)(2) 40 CFR Chapter 262, SubChapter I, PT 262, SubPT C 262.34(a)(2)
	Description:	Failed to clearly mark the date upon which each period of accumulation begins on each container.
	Self Report? Citation:	NO For Informational Pclassification: Minor 40 CFR Chapter 279, SubChapter I, PT 279, SubPT C 279.22(c)
	Description:	Failed to label or clearly mark containers and aboveground storage tanks used to stored used oil at generator facilities with the words "Used Oil."
	Self Report?	NO For Informational PClassification: On Moderate
	Citation:	30 TAC Chapter 335, SubChapter F 335.152(a)(1) 40 CFR Chapter 264, SubChapter I, PT 264, SubPT C 264.15(d) 50393, PP. II.A.2. Duty to Comply PERMIT 50393, PP. III. D. Gen. Inspection Reg. PERMIT
	Description:	Failed to follow the inspection schedule contained in the permit application submittals identified in Provision I.B. and as set out in Table III.D. Inspection Schedule. Failed to maintain records of inspections as required by 40 CFR 264.15(d) and 265.15(d).
43		/23/2019 (1582081)
	Self Report?	NO For Informational Pclassification: OnModerate
	Citation:	1902 STC 22 OP 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) NSR 23271 SC10 PERMIT
	Description:	Failure to adequately record all of the information required by the bag filter daily
	History Report f hrough January	for CN602582231, RN102663671, Rating Year 2020 which includes Compliance History (CH) components from January 11, 2021.

	inspection sheet. Specifically, Invista failed to adequately record all of the required information on two inspection forms on June 28, 2018 and July 8, 2018.
Self Report?	
Citation:	30 TAC Chapter 116, SubChapter B 116.115(c) 30 TAC Chapter 122, SubChapter B 122.143(4)
	40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.167(a)(1)
	5C THSC Chapter 382 382.085(b)
Description:	NSR 23271 SC 16E PERMIT Failure to prevent fugitive emissions from Open Ended Lines (OEL). Specifically, Invista
	discovered three open ended lines on August 14, 2018, August 16, 2018, and October 2, 2018.
Self Report?	NO For Informational Pclassification: On Moderate
Citation:	1902 STC 22 ORDER 30 TAC Chapter 116, SubChapter B 116.115(c)
	30 TAC Chapter 110, Subchapter B 110.113(C) 30 TAC Chapter 122, SubChapter B 122.143(4)
	5C THSC Chapter 382 382.085(b)
Description:	NSR 23271 SC 18 PERMIT Failure to adequately record all of the information required by when performing
F	ammonia (NH3) Audio, Visual and Olfactory (AVO) Inspections. Specifically, Invista
	failed to adequately record all of the required information during AVO inspections ten times from May 4, 2018 through April 25, 2019.
Self Report?	NO For Informational PClassification: OnModerate
Citation:	1902 STC 22 OF
	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)
Description:	NSR 23271 SC 24 PERMIT Failure to comply with the requirements listed in an applicable state permit. Specifically,
Description	Invista failed to take a second ammonia sample within twelve hours of an ammonia
	exceedance in the first sample on July 10, 2018 and February 12, 2019.
Self Report?	NO For Informational PClassification: OnModerate
Citation:	1902 STC 3 OP
	30 TAC Chapter 111, SubChapter A 111.111 30 TAC Chapter 122, SubChapter B 122.143(4)
Description:	Failure to conduct a quarterly visible emissions observation. Specifically, Invista failed to
	conduct the required third quarter of 2018 visible emissions observation for the RPF bag filter
Self Report?	NO For Informational PClassification: OnModerate
Citation:	1902 STC 22 OP
	30 TAC Chapter 116, SubChapter B 116.115(c) 30 TAC Chapter 122, SubChapter B 122.143(4)
	NSR 23271 SC 6 PERMIT
Description:	Failure to comply with the requirements listed in an applicable state permit. Specifically, Invista exceeded the emissions factor of 0.06 NOx MMBtu while firing rates were
	greater than 130 MM Btu for the Hydrogen Reformer Unit on July 31, 2018.
Self Report?	NO For Informational Pclassification: On Moderate
Citation:	1902 STC 22 OP
	30 TAC Chapter 116, SubChapter B 116.115(c) 30 TAC Chapter 122, SubChapter B 122.143(4)
	NSR 23271 SC 1 PERMIT
Description:	Failure to comply with the hourly maximum fill rate requirements listed in an applicable state permit. Specifically, Invista exceeded the hourly maximum fill rate permit
	representations for the Big A Crude Tank twice on January 22, 2019 and once on March
Colf Deport?	13, 2019.
Self Report? Citation:	NO For Informational Pclassification: On Moderate 1902 STC 22 OP
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)
	NSR 23271 SC 13 PERMIT
Description:	Failure to comply with the requirements listed in an applicable state permit. Specifically,
	Invista's HMD Rail Loading scrubber fell below 95 percent efficiency on December 28, 2018 and January 3, 2019.
Self Report?	NO For Informational PClassification: OnModerate
Citation:	1902 STC 6 OP
	30 TAC Chapter 116, SubChapter B 116.115(c) 30 TAC Chapter 122, SubChapter B 122.143(4)
	40 CFR Chapter 61, SubChapter C, PT 61, SubPT FF 61.354(a)(2)
	40 CFR Chapter 61, SubChapter C, PT 61, SubPT FF 61.356(i)(5) NSR 23271 SC 4 PERMIT
Description:	Failure to comply with the requirements listed in an applicable state permit.

Specifically, Invista failed to keep the make to feed ratio on the Benzene Flasher from dropping below 0.07 during a facility steam loss event on January 4, 2019. or Informational Persifications Self Report? NO Moderate 1902 STC 22 OP 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) NSR 31376 SC 13 PERMIT Failure to comply with the requirements listed in an applicable state permit. Specifically, Description: Invista exceeded the Total Dissolved Solids (TDS) concentration allowable limit during the week of April 24, 2019. Classification: Self Report? NO Moderate r Informational 1902 STC 22 OP 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) NSR 23271 SC 23 PERMIT Failure to adequately record all of the information required by the breather pot Description: inspection forms. Specifically, Invista failed to adequately record all of the required information on two inspection forms on January 18, 2019 and January 19, 2019. 08/30/2019 Date: (1590970)Informational Publications Self Report? NO Moderate Citation: 1904 ST&C 1A OP 30 TAC Chapter 101, SubChapter A 101.20(1) 30 TAC Chapter 113, SubChapter C 113.130 30 TAC Chapter 116, SubChapter B 116.115(c) 30 TAC Chapter 122, SubChapter B 122.143(4) 40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.167(a)(2) 5C THSC Chapter 382 382.085(b) NSR 7186 SC 21F PERMIT Description: Failure to equip each open-ended line (OEL) with a cap, blind flange, plug, or second valve to seal the line. Specifically, Invista discovered fifteen (15) open ended lines from April 1, 2018 through March 31, 2019. Informational PClassification: Self Report? NO Moderate 1904 ST&C 1A OP Citation: 30 TAC Chapter 101, SubChapter A 101.20(1) 30 TAC Chapter 113, SubChapter C 113.130 30 TAC Chapter 116, SubChapter B 116.115(c) 30 TAC Chapter 122, SubChapter B 122.143(4) 40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.171(a) 5C THSC Chapter 382 382.085(b) NSR 7186 SC 21J PERMIT Description: Failure to comply with the requirements listed in an applicable state permit. Specifically, Invista failed to repair a valve placed on Delay of Repair during a scheduled shutdown on March 31, 2019. Classification: Self Report? NO Moderate Informational Citation: 1904 ST&C 28 OP 30 TAC Chapter 101, SubChapter A 101.20(1) 30 TAC Chapter 111, SubChapter A 111.111(a)(4)(A) 30 TAC Chapter 113, SubChapter C 113.130 30 TAC Chapter 116, SubChapter B 116.115(c) 30 TAC Chapter 122, SubChapter B 122.143(4) 40 CFR Part 60, Subpart A 60.18 40 CFR Part 63, Subpart A 63.11 5C THSC Chapter 382 382.085(b) NSR 7186 SC 8C PERMIT Description: Failure to operate with no visible emissions. Specifically, Invista operated the ADN flare with visible emissions for six minutes and fifty seconds on April 11, 2018. Visible emissions are not to exceed a total of five minutes during any two consecutive hour periods. Classification: Self Report? NO Moderate Informational 1904 ST&C 28 OP Citation: 30 TAC Chapter 101, SubChapter A 101.20(2) 30 TAC Chapter 116, SubChapter B 116.115(c) 30 TAC Chapter 122, SubChapter B 122.143(4) 40 CFR Chapter 61, SubChapter C, PT 61, SubPT FF 61.356(b)(4) 5C THSC Chapter 382 382.085(b) NSR 7186 SC 4 PERMIT Description: Failure to adequately record all of the information required when performing quarterly Individual Drain Systems (IDS) Inspections. Specifically, Invista failed to identify and document water seals that had insufficient water levels and

	appropriately address those issues as part of the quarterly inspections required by 40
Solf Doport?	CFR §61.356(b)(4)(i).
Self Report? Citation:	1904 ST&C 1A OP
	30 TAC Chapter 111, SubChapter A 111.111 30 TAC Chapter 122, SubChapter B 122.143(4) 5C THSC Chapter 382 382.085(b)
Description:	Failure to adequately record all of the information required when performing a quarterly Method 9 visible emissions observation. Specifically, Invista to record all of the information required on the Method 9 visible emissions observation form for the second quarter of 2018.
Self Report?	NO For Informational PClassification: On Moderate
Citation:	1904 ST&C 1A OP 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)
Description:	Failure to perform daily visible emissions observations. Specifically, Invista failed to perform daily visible emissions observations while the Cold NH3 flare was in operation on February 16, 2019, February 17, 2019, March 21, 2019, and March 22, 2019.
Date: 08/	/30/2019 (1557529)
Self Report?	NO For Informational PClassification: On 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)
	GTC 1, 10, 14 OP GTC OP
	STC 11 OP STC 15 OP
Description	STC 25 OP The Inviste CARL Victoria Site (Inviste) failed to abide by special term and condition
Description:	The Invista SARL - Victoria Site (Invista) failed to abide by special term and condition (STC) 11 of NSR 813 and STC 25 of NSR 812.
Self Report?	NO For Informational PClassifications On Moderate
Citation:	30 TAC Chapter 116, SubChapter B 116.115(c) 30 TAC Chapter 122, SubChapter B 122.143(4) 40 CFR Chapter 63, SubChapter C, PT 63, SubPT EEE 63.1211(b) 5C THSC Chapter 382 382.085(b) GTC 1 & 7 OP
	GTC 10 & 14 OP GTC OP STC 1(A) OP
	STC 1(E) OP STC 15 OP STC 7 (C) OP
Description:	STC 7(D) OP Invista failed to comply with NSR 813 STC 7(C).
Self Report?	NO For Informational PClassification: On Moderate
Citation:	30 TAC Chapter 101, SubChapter F 101.211(b)
	30 TAC Chapter 111, SubChapter A 111.111(a)(1)(B) 30 TAC Chapter 116, SubChapter B 116.110(a)
	30 TAC Chapter 122, SubChapter B 122.143(4) 5C THSC Chapter 382 382.085(b)
	GTC 1, 10, 14 OP
	GTC OP STC 15 OP
	STC 1A OP
Description:	STC 3 OP Invista exceeded its permitted opacity limit of 20% averaged over a 6-minute period for the combined stack for boilers 3 and 4 (EPN 15STK-006), and the combined stack for boilers 7 and 8 (EPN 17STK-007) as required in NSR 812 STC 3 and NSR 813 STC 3 on
Solf Doport?	eight occasions.
Self Report? Citation:	NO For Informational Classification: Moderate 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) GTC 1, 10, 14 OP
	GTC OP STC 15 OP
Description:	STC 6(D) OP Invista failed to maintain a minimum flow of 2,350 standard cubic feet per hour (SCFH) of supplemental natural gas flow to the ring burner of the flare designated as "AOP
	Flare" (EPN 14FLR-001A) on two occasions.

Self Report? Citation:	NO For Informational Classification: Moderate 30 TAC Chapter 117, SubChapter F 117.4205 30 TAC Chapter 122, SubChapter B 122.143(4) 5C THSC Chapter 382 382.085(b)
	GTC 1, 8, 10, 14 OP GTC OP STC 1 OP STC 15 OP
Description: Self Report?	Invista failed to abide by 30 TAC §117.4205. NO For Informational PClassification: OnModerate
Citation:	30 TAC Chapter 122, SubChapter B 122.143(4) 5C THSC Chapter 382 382.085(b) GTC 1, 8, 10, 14 OP GTC OP STC 1 OP STC 15 OP
Description:	Invista failed to abide by their maximum allowable emissions rate (MAERT) for NOx as listed in NSR 809's MAERT table for the ammonia oxidation process (AOP) main stack (EPN 14STK-001).
Self Report?	NO For Informational PClassification: On 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) GTC 1, 7, 10, 14 OP GTC OP STC 12(B) OP STC 12 OP
Description:	STC 13 OP Invista failed to maintain records of continuous water flow to the hydrochloric acid
Self Report?	(HCL) scrubber at least once per day when the HCL tank is in service.
Citation:	30 TAC Chapter 116, SubChapter B 116.115(b)(2)(F)
	30 TAC Chapter 122, SubChapter B 122.143(4) 5C THSC Chapter 382 382.085(b) GTC 1, 8, 10, 14 OP GTC OP STC 1 OP STC 15 OP
Description:	Invista failed to abide by its MAERT limit of 4998.11 lbs/hour NOx regarding the catalytic abater unit (EPN 1SCAT-001).
Self Report?	NO For Informational PClassification: On Moderate
Citation:	30 TAC Chapter 116, SubChapter B 116.115(c) 30 TAC Chapter 122, SubChapter B 122.143(4) 40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.167(a)(1) 5C THSC Chapter 382 382.085(b) GTC 1, 9, 10, 14 OP GTC OP STC 12(E) OP STC 15 OP
Description:	Invista failed to meet the open-needed line (OEL) requirements outlined in NSR 813, STC 12 (E).
Self Report?	NO For Informational PClassification: On Moderate
Citation:	30 TAC Chapter 101, SubChapter F 101.201 30 TAC Chapter 116, SubChapter B 116.115(c) 30 TAC Chapter 122, SubChapter B 122.143(4) 40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.168(b) 5C THSC Chapter 382 382.085(b)
	GTC 1, 9 ,10, 14 OP GTC OP STC 12(F) OP STC 16 OP
Description:	Invista failed to monitor a valve that was placed back into volatile organic compounds (VOC) service on nine occasions.
Self Report?	NO For Informational PClassification: OnModerate
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) GTC 1, 9, 10, 14 OP GTC OP STC 15 OP
Description:	STC 9 OP Invista failed to abide by time requirements for planned continuous emissions
	monitoring system (CEMS) maintenance outlined within NSR 812.

	Self Report?	NO Classification: Moderate 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 D 60.44 5C THSC Chapter 382 382.085(b) GTC 1, 10, 14 OP GTC 0p
		GTC OP STC 15 OP
	Description: Self Report?	STC 5(A) OP Invista failed to abide by NOx emissions limits required by 40 CFR 60.44. NO For Informational Pclassification: Moderate
	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) GTC OP STC 14 OP
	Description:	Invista failed to report all instances of deviations.
	•	NO For Informational PClassification: OnModerate
	Citation:	30 TAC Chapter 116, SubChapter B 116.115(c) 30 TAC Chapter 122, SubChapter B 122.143(4)
		40 CFR Chapter 63, SubChapter C, PT 63, SubPT A 63.10(b)
		40 CFR Chapter 63, SubChapter C, PT 63, SubPT A 63.10(c) 40 CFR Chapter 63, SubChapter C, PT 63, SubPT EEE 63.1200
		40 CFR Chapter 63, SubChapter C, PT 63, SubPT EEE 63.1211(b)
		40 CFR Chapter 63, SubChapter C, PT 63, SubPT EEE 63.1217(a)(5)(i) GTC 1, 7, 10, 14 OP
		GTC OP
		STC 15 OP STC 5(C)(5) OP
	Description:	Invista Failed to abide by the CO hourly rolling average emissions concentration for
	Self Report?	start-up activities and reporting/recording requirements. NO For Informational Classification: Moderate
	Citation:	30 TAC Chapter 111, SubChapter A 111.111(a)(1)(E)
		30 TAC Chapter 116, SubChapter B 116.115(c) 30 TAC Chapter 122, SubChapter B 122.143(4) 30 TAC Chapter 122, SubChapter B 122.144(1) GTC 1, 7, 10 OP GTC OP STC 12 OP STC 12 OP STC 13 OP STC 3 OP
	Description:	Invista failed to maintain monitoring records
46	Date: 08/3	1/2019 (1606389)
		YES For Informational Classification: Moderate 2D TWC Chapter 26, SubChapter A 26.121(a)
	Description:	30 TAC Chapter 305, SubChapter F 305.125(1) Failure to meet the limit for one or more permit parameter
	Description.	
47*	-	1/2019 (1619049)
	Self Report? ` Citation:	YES For Informational Classification: On 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
48*	Date: 12/3	1/2019 (1634042)
	Self Report?	YES For Informational PClassification: On 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
49*	Date: 01/03	3/2020 (1605279)
		NO For Informational PClassification: On Moderate
	Citation:	30 TAC Chapter 305, SubChapter F 305.125(1)
		30 TAC Chapter 305, SubChapter F 305.125(5) Operational Requirements No. 1, Pg. 13 PERMIT
	Description:	Failed to ensure at all times that the facility and all of its systems of collection,
		treatment, and disposal are properly operated and maintained.

	Self Report?	YES For Informational PClassification: On Moderate
	Citation: Description:	2D TWC Chapter 26, SubChapter A 26.121(a) 30 TAC Chapter 305, SubChapter F 305.125(1) Failure to meet the limit for one or more permit parameter
	Description.	
51*	Date: 05/ Self Report?	V29/2020 (1644596) NO For Informational 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) GTC OP SC 7C PERMIT STC 15 OP STC 4E OP
	Description:	Failure to comply with time requirements for planned continuous emissions monitoring system (CEMS) maintenance.
	Self Report? Citation:	NO Classification: Moderate 30 TAC Chapter 111, SubChapter A 111.111(a)(1)(B) 30 TAC Chapter 116, SubChapter B 116.110 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) GTC OP SC 3 PA SC 3 PERMIT STC 15 OP STC 1A OP
	Description:	Failure to maintain opacity from a vent below 20% averaged over a six-minute period.
	Self Report? Citation:	NO Classification: Moderate 30 TAC Chapter 116, SubChapter B 116.115(c) 30 TAC Chapter 117, SubChapter F 117.4205 30 TAC Chapter 122, SubChapter B 122.143(4) 5C THSC Chapter 382 382.085(b) GTC OP SC 1 PERMIT STC 15 OP STC 1A OP
	Description:	Failure to maintain nitric acid production emissions of nitrogen oxides (NOx) below 600 parts per million by volume.
	Self Report? Citation:	NO Classification: Moderate 30 TAC Chapter 116, SubChapter B 116.115(b)(2)(F) 30 TAC Chapter 116, SubChapter B 116.115(c) 30 TAC Chapter 117, SubChapter F 117.4205 30 TAC Chapter 122, SubChapter B 122.143(4) 5C THSC Chapter 382 382.085(b) GTC OP SC 1 PERMIT STC 15 OP
	Description:	Failure to comply with the hourly NOx rate of the Maximum Allowable Emission Rates Table (MAERT) of NSR 809.
	Self Report? Citation:	NO         Classification:         Moderate           30 TAC Chapter 113, SubChapter C 113.620         30 TAC Chapter 116, SubChapter B 116.115(b)         30 TAC Chapter 116, SubChapter B 116.115(c)           30 TAC Chapter 122, SubChapter B 122.143(4)         30 TAC Chapter 122, SubChapter B 122.143(6)         40 CFR Chapter 63, SubChapter C, PT 63, SubPT EEE 63.1206(c)(3)(vii)           5C THSC Chapter 382 382.085(b)         GTC OP         SC 5C4 PERMIT           SC 5C5 PERMIT         STC 15 OP         STC 14 OP           STC 1E OP         STC 1E OP         STC 1E OP
	Description: Self Report?	Failure to comply with 40 CFR Part 63, Subpart EEE.
	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) GTC OP SC 6 PERMIT STC 15 OP
	ce History Report fo through January 1	or CN602582231, RN102663671, Rating Year 2020 which includes Compliance History (CH) components from January 1, 2021. Page 36
		rage JU

Description: Self Report?	Failure to comply with special conditions of NSR 9560. NO Ear Informational 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)
	GTC OP SC 5B PERMIT
Description	STC 15 OP Failure to comply with special conditions of NSR 9560.
Description: Self Report?	NO For Informational PClassification: Orderate
Citation:	30 TAC Chapter 116, SubChapter B 116.115(b)
	30 TAC Chapter 116, SubChapter B 116.115(c) 30 TAC Chapter 122, SubChapter B 122.143(4)
	30 TAC Chapter 122, SubChapter B 122.143(6)
	40 CFR Chapter 63, SubChapter C, PT 63, SubPT EEE 63.1211(b) 5C THSC Chapter 382 382.085(b)
	GTC OP SC 5C4 PERMIT
	STC 15 OP
Description:	STC 1E OP Failure to comply with 40 CFR Part 63, Subpart EEE.
Self Report?	NO For Informational PClassification: OnModerate
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) GTC OP
	SC 1 PERMIT
Description:	STC 15 OP Failure to comply with the Maintenance, StartUp, and Shutdown Operations (MSS)
	hourly NH3 rate of MAERT of NSR 809.
Self Report?	NO For Informational PClassification: OnModerate
Citation:	30 TAC Chapter 116, SubChapter B 116.115(c) 30 TAC Chapter 122, SubChapter B 122.143(4)
	40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.167(a)(1) 5C THSC Chapter 382 382.085(b)
	GTC OP
	SC 12E PERMIT STC 15 OP
Description:	Failure to meet open-ended line (OEL) requirements. Specifically, Invista discovered five
	(5) OELs during the period. See DR1, deviation item number 16 and DR2, deviation item number 17.
Self Report?	NO For Informational PClassification: On 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)
	GTC OP SC 11F PERMIT
	SC 12F PERMIT
Description:	STC 15 OP Failure to monitor all valves quarterly for fugitive emissions with approved gas analyzer.
Self Report? Citation:	NO For Informational Classification: Moderate 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) GTC OP
	SC 11 PERMIT
Description:	STC 15 OP Failure to comply with special conditions of NSR 813.
Self Report?	NO For Informational Plassification: OnModerate
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 60.13
	5C THSC Chapter 382 382.085(b) GTC OP
	SC 9 PERMIT
	STC 15 OP STC 4E OP
Description:	Failure to meet quarterly monitoring requirement for continuous emissions monitoring system (CEMS) testing.
Self Report?	NO For Informational PClassification: On Moderate
Citation:	30 TAC Chapter 116, SubChapter B 116.115(c)
nistory Report fo	or CN602582231, RN102663671, Rating Year 2020 which includes Compliance History (CH) com

	30 TAC Chapter 122, SubChapter B 122.143(4)
	5C THSC Chapter 382 382.085(b) GTC OP
	SC 7C PERMIT
	STC 15 OP STC 4E OP
Description:	Failure to meet hourly monitoring requirement for continuous demonstration of compliance.
Self Report?	NO For Informational PClassification: Or 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)
	GTC OP SC 1 PERMIT
	STC 15 OP
Description:	Failure to comply with the hourly N2O rate of the MAERT of NSR 812.
Date: 08/	/17/2020 (1659535)
Self Report?	NO For Informational Pclassifications OnModerate
Citation:	40 CFR Chapter 63, SubChapter C, PT 63, SubPT ZZZZ 63.6640 5C THSC Chapter 382 382.085(b)
	FOP O-01902, Special Term & Condition 1 OP
Description: Self Report?	Failure to comply with time limit usage of emergency engines.
Citation:	30 TAC Chapter 122, SubChapter B 122.143(4)
	40 CFR Chapter 82, SubChapter C, PT 82, SubPT F 82.161(a)(1)
Description:	5C THSC Chapter 382 382.085(b) Failure to comply with certification requirements for operating Relief Valves (RVs).
Self Report?	NO For Informational PClassification: On Moderate
Citation:	30 TAC Chapter 101, SubChapter A 101.20(1) 30 TAC Chapter 113, SubChapter C 113.100
	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 VV 60.482-6(a)(1) 40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.167(a)(1)
	5C THSC Chapter 382 382.085(b)
	FOP O-01902, Special Term & Condition 22 OP NSR 23271/PSDTX1416/PSDTX1079M2, SC 16E PERMIT
Description: Self Report?	Failure to prevent open-ended lines.
Citation:	NO For Informational Classification: Moderate 30 TAC Chapter 101, SubChapter A 101.20(3)
citation	30 TAC Chapter 116, SubChapter B 116.111
	30 TAC Chapter 116, SubChapter B 116.115(c) 30 TAC Chapter 122, SubChapter B 122.143(4)
	30 TAC Chapter 122, SubChapter B 122.144(1)
	5C THSC Chapter 382 382.085(b) FOP O-01902, General Terms & Conditions OP
	FOP O-01902, Special Term & Condition 22 OP
	NSR 23271/PSDTX1416/PSDTX1079M2, SC 11D PERMIT NSR 23271/PSDTX1416/PSDTX1079M2, SC 18A PERMIT
	NSR 23271/PSDTX1416/PSDTX1079M2, SC 23 PERMIT
	NSR 23271/PSDTX1416/PSDTX1079M2, SC 7 PERMIT NSR 31376, SC 18 PERMIT
Description:	Failure to maintain records as required by applicable state permit requirements.
Self Report?	NO For Informational PClassifications On 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 O-01902, Special Term & Condition 22 OP NSR 31376, SC 10 PERMIT
Description:	Failure to conduct wastewater testing on a quarterly basis as required by the applicable
Self Report?	state permit NO Ear Informational DClassification: Moderate
Citation:	30 TAC Chapter 101, SubChapter A 101.20(3)
	30 TAC Chapter 116, SubChapter B 116.110(e)(2)
	30 TAC Chapter 116, SubChapter B 116.115(b) 30 TAC Chapter 122, SubChapter B 122.143(4)
	5C THSC Chapter 382 382.085(b)
	FOP O-01902, Special Term & Condition 22 OP NSR 23271/PSDTX1416/PSDTX1079M2, GT&C 1 PERMIT
Description:	Failure to operate as represented.

Compliance History Report for CN602582231, RN102663671, Rating Year 2020 which includes Compliance History (CH) components from January 11, 2016, through January 11, 2021.

	Self Report? Citation: Description:	NO For Information Classification: Moderate 30 TAC Chapter 101, SubChapter A 101.20(3) 30 TAC Chapter 111, SubChapter A 111.111(a)(1)(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 O-01902, Special Term & Condition 3A OP NSR 23271/PSDTX1416/PSDTX1079M2, SC 3 PERMIT Failure to conduct quarterly Method 9 observations.
53*	Date: 08	/20/2020 (1658179)
	Self Report? Citation:	NO For Informational Classification: Moderate 2D TWC Chapter 26, SubChapter A 26.121(a)(1) 30 TAC Chapter 305, SubChapter F 305.125(1)
	Description:	Permit Conditions; No. 2g, Pg. 7 PERMIT Failed to prevent an unauthorized discharge of wastewater or any other waste.
54*	Date: 08	/25/2020 (1657948)
	Self Report?	NO For Informational PClassification: OnMyderate
	Citation:	1904 ST&C 1A OP 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) 7186, SC 11 PERMIT
	Description:	Failure to comply with the requirements listed in an applicable state permit. Specifically, on April 3, 2019 Invista loaded crude cresol into a tank trailer that had an expired Department of Transportation (DOT) leak tight check and annual DOT Certification.
	Self Report?	NO For Informational Persification: OnMyderate
	Citation:	1904 ST&C 1A OP
		30 TAC Chapter 116, SubChapter B 116.115(c) 30 TAC Chapter 122, SubChapter B 122.143(4) 40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.169(c)(1) 5C THSC Chapter 382 382.085(b)
	Description:	Failure to comply with the requirements listed in an applicable state permit. Specifically, Invista failed to repair a pump within the fifteen-day regulatory timeframe. The pump was found leaking on April 11, 2019 but was not placed on Delay of Repair until June 10, 2019.
	Self Report?	NO For Informational Pclassification: On Moderate 1904 ST&C 28 OP
	Citation:	1904 ST&C 28 OP
		30 TAC Chapter 116, SubChapter B 116.115(c) 30 TAC Chapter 122, SubChapter B 122.143(4) 40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.167(a)(2) 5C THSC Chapter 382 382.085(b) 7186, SC 21F PERMIT
	Description:	Failure to equip each open-ended line (OEL) with a cap, blind flange, plug, or second valve to seal the line. Specifically, Invista discovered thirty-four (34) open ended lines from April 1, 2019 through March 31, 2020.
	Self Report?	NO For Informational PClassifications OnModerate
	Citation:	1904 ST&C 1A OP 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)
	Description:	Failure to perform visible emissions observations. Specifically, Invista failed to perform visible emissions observations five (5) times from May 22, 2019 through June 3, 2019 for the Butadiene Flare and the Cold NH3 Flare.
	Self Report?	NO For Informational PClassification: OnModerate
	Citation:	1904 ST&C 1 OP 30 TAC Chapter 116, SubChapter B 116.115(c) 30 TAC Chapter 122, SubChapter B 122.143(4) 40 CFR Part 63, Subpart H 63.166 5C THSC Chapter 382 382.085(b) 7186, SC 1 PERMIT
	Description:	Failure to send purged liquids from a sample station to a closed-purge, closed-loop, or closed-vent system. Specifically, Invista's ADN column tails sample station drain was plugged which sent purged liquids from the ADN column tail sample station to their slab and open trench areas.
	Self Report?	NO For Informational PClassification: OnModerate
	Citation:	1904 ST&C 28 OP 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)
Compliance	llistor Donort f	ar CN602592221 PN102662671 Pating Yoar 2020 which includes Compliance History (CH) of

Compliance History Report for CN602582231, RN102663671, Rating Year 2020 which includes Compliance History (CH) components from January 11, 2016, through January 11, 2021.

Description:	7186, SC 1 PERMIT Failure to comply with the requirements listed in an applicable state permit. Specifically, Invista exceeded the 12-month rolling throughput from April 1, 2019 through September 30, 2019 for the PN Seal Flush Tank.
Self Report?	NO For Informational Pclassification: On Moderate 1904 ST&C 28 OP
Citation:	1904 ST&C 28 OP
	30 TAC Chapter 101, SubChapter F 101.201
	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)
	7186, SC 1 PERMIT
Description:	Failure to notify the TCEQ Corpus Christi Region Office of a reportable emissions event within 24 hours after the discovery of the event. Specifically, an emissions event, Texas Commission on Environmental Quality (TCEQ)/State of Texas Environmental Electronic Reporting System (STEERS) Incident No. 325563, was discovered on November 22, 2019 at 0542 hours; however, Invista reported the event to the TCEQ Region Office on November 26, 2019 at 0311 hours which was four days after the 24-hour deadli

Date:

08/28/2020 (1624119) r+2 NO

C - 16 D 12	
Self Report?	NO For Informational PClassifications On Moderate
Citation:	30 TAC Chapter 101, SubChapter A 101.20(3)
	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)
	PSDTX 1448, SC 8(E) PERMIT
	ST&C 16 OP
Description:	Failure to equip each open-ended valve or line (OEL) with an appropriately sized cap,
	blind flange, plug, or a second valve to seal the line.
Self Report?	NO For Informational PClassification: On Moderate
Citation:	30 TAC Chapter 101, SubChapter A 101.20(3)
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)
	PSDTX 1448, SC 16 PERMIT
	ST&C 16 OP
Description:	Failure to maintain valid data of differential pressure across the No. 4 Dryer Bag Filter
Description	baghouse for at least 95 percent of the time that the baghouse operated over the
	previous rolling 12-month period.
Self Report?	
-	FOR INTORNALIONAL PURDOSES UNIV
Citation:	30 TAC Chapter 101, SubChapter A 101.20(3)
	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)
	PSDTX 1448, SC 8(F) PERMIT
Description	ST&C 16 OP
Description:	Failure to re-monitor the replacement for a leaking component within 15 days of being
	placed back into volatile organic compound (VOC) service.
Self Report?	NO For Informational Classification: Moderate
Self Report? Citation:	placed back into volatile organic compound (VOC) service. NO For Informational Classification: Moderate 30 TAC Chapter 122, SubChapter B 122.143(4)
•	placed back into volatile organic compound (VOC) service. NO For Informational Classification: Moderate 30 TAC Chapter 122, SubChapter B 122.143(4) 5C THSC Chapter 382 382.058(b)
•	placed back into volatile organic compound (VOC) service. NO Classification: Moderate 30 TAC Chapter 122, SubChapter B 122.143(4) 5C THSC Chapter 382 382.058(b) ST&C 15 OP
Citation: Description:	placed back into volatile organic compound (VOC) service. NO Classification: Moderate 30 TAC Chapter 122, SubChapter B 122.143(4) 5C THSC Chapter 382 382.058(b) ST&C 15 OP Failure to conduct visible emissions observations once per calendar quarter.
Citation:	placed back into volatile organic compound (VOC) service. NO For Informational Classification: Moderate 30 TAC Chapter 122, SubChapter B 122.143(4) 5C THSC Chapter 382 382.058(b) ST&C 15 OP Failure to conduct visible emissions observations once per calendar quarter.
Citation: Description: Self Report?	placed back into volatile organic compound (VOC) service. NO Classification: Moderate 30 TAC Chapter 122, SubChapter B 122.143(4) 5C THSC Chapter 382 382.058(b) ST&C 15 OP Failure to conduct visible emissions observations once per calendar quarter. NO For Informational Classification: Moderate
Citation: Description:	placed back into volatile organic compound (VOC) service. NO Classification: Moderate 30 TAC Chapter 122, SubChapter B 122.143(4) 5C THSC Chapter 382 382.058(b) ST&C 15 OP Failure to conduct visible emissions observations once per calendar quarter. NO Classification: Moderate 30 TAC Chapter 101, SubChapter F 101.201(b)
Citation: Description: Self Report?	placed back into volatile organic compound (VOC) service. NO Classification: Moderate 30 TAC Chapter 122, SubChapter B 122.143(4) 5C THSC Chapter 382 382.058(b) ST&C 15 OP Failure to conduct visible emissions observations once per calendar quarter. NO Classification: Moderate 30 TAC Chapter 101, SubChapter F 101.201(b) 30 TAC Chapter 122, SubChapter B 122.143(4)
Citation: Description: Self Report?	placed back into volatile organic compound (VOC) service. NO Classification: Moderate 30 TAC Chapter 122, SubChapter B 122.143(4) 5C THSC Chapter 382 382.058(b) ST&C 15 OP Failure to conduct visible emissions observations once per calendar quarter. NO Classification: Moderate 30 TAC Chapter 101, SubChapter F 101.201(b) 30 TAC Chapter 122, SubChapter B 122.143(4) 5C THSC Chapter 382 382.085(b)
Citation: Description: Self Report? Citation:	placed back into volatile organic compound (VOC) service. NO Classification: Moderate 30 TAC Chapter 122, SubChapter B 122.143(4) 5C THSC Chapter 382 382.058(b) ST&C 15 OP Failure to conduct visible emissions observations once per calendar quarter. NO Classification: Moderate 30 TAC Chapter 101, SubChapter F 101.201(b) 30 TAC Chapter 122, SubChapter B 122.143(4) 5C THSC Chapter 382 382.085(b) ST&C 2(F) OP
Citation: Description: Self Report?	placed back into volatile organic compound (VOC) service. NO Classification: Moderate 30 TAC Chapter 122, SubChapter B 122.143(4) 5C THSC Chapter 382 382.058(b) ST&C 15 OP Failure to conduct visible emissions observations once per calendar quarter. NO Classification: Moderate 30 TAC Chapter 101, SubChapter F 101.201(b) 30 TAC Chapter 122, SubChapter B 122.143(4) 5C THSC Chapter 382 382.085(b) ST&C 2(F) OP Failure to create complete final records of all non-reportable (recordable) emissions
Citation: Description: Self Report? Citation:	placed back into volatile organic compound (VOC) service. NO Classification: Moderate 30 TAC Chapter 122, SubChapter B 122.143(4) 5C THSC Chapter 382 382.058(b) ST&C 15 OP Failure to conduct visible emissions observations once per calendar quarter. NO Classification: Moderate 30 TAC Chapter 101, SubChapter F 101.201(b) 30 TAC Chapter 122, SubChapter B 122.143(4) 5C THSC Chapter 382 382.085(b) ST&C 2(F) OP
Citation: Description: Self Report? Citation: Description:	placed back into volatile organic compound (VOC) service. NO Classification: Moderate 30 TAC Chapter 122, SubChapter B 122.143(4) 5C THSC Chapter 382 382.058(b) ST&C 15 OP Failure to conduct visible emissions observations once per calendar quarter. NO Classification: Moderate 30 TAC Chapter 101, SubChapter F 101.201(b) 30 TAC Chapter 101, SubChapter F 101.201(b) 30 TAC Chapter 122, SubChapter B 122.143(4) 5C THSC Chapter 382 382.085(b) ST&C 2(F) OP Failure to create complete final records of all non-reportable (recordable) emissions events as soon as practicable but no later than two weeks after the end of the emissions events.
Citation: Description: Self Report? Citation: Description: Self Report?	placed back into volatile organic compound (VOC) service. NO Classification: Moderate 30 TAC Chapter 122, SubChapter B 122.143(4) 5C THSC Chapter 382 382.058(b) ST&C 15 OP Failure to conduct visible emissions observations once per calendar quarter. NO Classification: Moderate 30 TAC Chapter 101, SubChapter F 101.201(b) 30 TAC Chapter 122, SubChapter B 122.143(4) 5C THSC Chapter 382 382.085(b) ST&C 2(F) OP Failure to create complete final records of all non-reportable (recordable) emissions events as soon as practicable but no later than two weeks after the end of the emissions events. NO Classification: Moderate
Citation: Description: Self Report? Citation: Description:	placed back into volatile organic compound (VOC) service. NO Classification: Moderate 30 TAC Chapter 122, SubChapter B 122.143(4) 5C THSC Chapter 382 382.058(b) ST&C 15 OP Failure to conduct visible emissions observations once per calendar quarter. NO Classification: Moderate 30 TAC Chapter 101, SubChapter F 101.201(b) 30 TAC Chapter 122, SubChapter B 122.143(4) 5C THSC Chapter 382 382.085(b) ST&C 2(F) OP Failure to create complete final records of all non-reportable (recordable) emissions events as soon as practicable but no later than two weeks after the end of the emissions events. NO Classification: Moderate 30 TAC Chapter 101, SubChapter A 101.20(3)
Citation: Description: Self Report? Citation: Description: Self Report?	placed back into volatile organic compound (VOC) service. NO Classification: Moderate 30 TAC Chapter 122, SubChapter B 122.143(4) 5C THSC Chapter 382 382.058(b) ST&C 15 OP Failure to conduct visible emissions observations once per calendar quarter. NO Classification: Moderate 30 TAC Chapter 101, SubChapter F 101.201(b) 30 TAC Chapter 122, SubChapter B 122.143(4) 5C THSC Chapter 382 382.085(b) ST&C 2(F) OP Failure to create complete final records of all non-reportable (recordable) emissions events as soon as practicable but no later than two weeks after the end of the emissions events. NO Classification: Moderate 30 TAC Chapter 101, SubChapter A 101.20(3) 30 TAC Chapter 116, SubChapter B 116.115(b)(2)(F)
Citation: Description: Self Report? Citation: Description: Self Report?	placed back into volatile organic compound (VOC) service. NO Classification: Moderate 30 TAC Chapter 122, SubChapter B 122.143(4) 5C THSC Chapter 382 382.058(b) ST&C 15 OP Failure to conduct visible emissions observations once per calendar quarter. NO Classification: Moderate 30 TAC Chapter 101, SubChapter F 101.201(b) 30 TAC Chapter 122, SubChapter B 122.143(4) 5C THSC Chapter 382 382.085(b) ST&C 2(F) OP Failure to create complete final records of all non-reportable (recordable) emissions events as soon as practicable but no later than two weeks after the end of the emissions events. NO Classification: Moderate 30 TAC Chapter 101, SubChapter A 101.20(3) 30 TAC Chapter 116, SubChapter B 116.115(b)(2)(F) 30 TAC Chapter 116, SubChapter B 116.115(c)
Citation: Description: Self Report? Citation: Description: Self Report?	placed back into volatile organic compound (VOC) service. NO Classification: Moderate 30 TAC Chapter 122, SubChapter B 122.143(4) 5C THSC Chapter 382 382.058(b) ST&C 15 OP Failure to conduct visible emissions observations once per calendar quarter. NO Classification: Moderate 30 TAC Chapter 101, SubChapter F 101.201(b) 30 TAC Chapter 122, SubChapter B 122.143(4) 5C THSC Chapter 382 382.085(b) ST&C 2(F) OP Failure to create complete final records of all non-reportable (recordable) emissions events as soon as practicable but no later than two weeks after the end of the emissions events. NO Classification: Moderate 30 TAC Chapter 101, SubChapter A 101.20(3) 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)
Citation: Description: Self Report? Citation: Description: Self Report?	placed back into volatile organic compound (VOC) service. NO Classification: Moderate 30 TAC Chapter 122, SubChapter B 122.143(4) 5C THSC Chapter 382 382.058(b) ST&C 15 OP Failure to conduct visible emissions observations once per calendar quarter. NO Classification: Moderate 30 TAC Chapter 101, SubChapter F 101.201(b) 30 TAC Chapter 122, SubChapter B 122.143(4) 5C THSC Chapter 382 382.085(b) ST&C 2(F) OP Failure to create complete final records of all non-reportable (recordable) emissions events as soon as practicable but no later than two weeks after the end of the emissions events. NO Classification: Moderate 30 TAC Chapter 101, SubChapter A 101.20(3) 30 TAC Chapter 101, 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)
Citation: Description: Self Report? Citation: Description: Self Report?	placed back into volatile organic compound (VOC) service. NO Classification: Moderate 30 TAC Chapter 122, SubChapter B 122.143(4) 5C THSC Chapter 382 382.058(b) ST&C 15 OP Failure to conduct visible emissions observations once per calendar quarter. NO Classification: Moderate 30 TAC Chapter 101, SubChapter F 101.201(b) 30 TAC Chapter 122, SubChapter B 122.143(4) 5C THSC Chapter 382 382.085(b) ST&C 2(F) OP Failure to create complete final records of all non-reportable (recordable) emissions events as soon as practicable but no later than two weeks after the end of the emissions events. NO Classification: Moderate 30 TAC Chapter 101, SubChapter A 101.20(3) 30 TAC Chapter 101, SubChapter A 101.20(3) 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) PSDTX 1448, GC 14 PA
Citation: Description: Self Report? Citation: Description: Self Report?	placed back into volatile organic compound (VOC) service. NO Classification: Moderate 30 TAC Chapter 122, SubChapter B 122.143(4) SC THSC Chapter 382 382.058(b) ST&C 15 OP Failure to conduct visible emissions observations once per calendar quarter. NO Classification: Moderate 30 TAC Chapter 101, SubChapter F 101.201(b) 30 TAC Chapter 122, SubChapter B 122.143(4) SC THSC Chapter 382 382.085(b) ST&C 2(F) OP Failure to create complete final records of all non-reportable (recordable) emissions events as soon as practicable but no later than two weeks after the end of the emissions events. NO Classification: Moderate 30 TAC Chapter 101, SubChapter A 101.20(3) 30 TAC Chapter 101, 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) SC THSC Chapter 382 382.085(b) PSDTX 1448, GC 14 PA PSDTX 1448, GC 8 PERMIT
Citation: Description: Self Report? Citation: Description: Self Report?	placed back into volatile organic compound (VOC) service. NO Classification: Moderate 30 TAC Chapter 122, SubChapter B 122.143(4) 5C THSC Chapter 382 382.058(b) ST&C 15 OP Failure to conduct visible emissions observations once per calendar quarter. NO Classification: Moderate 30 TAC Chapter 101, SubChapter F 101.201(b) 30 TAC Chapter 122, SubChapter B 122.143(4) 5C THSC Chapter 382 382.085(b) ST&C 2(F) OP Failure to create complete final records of all non-reportable (recordable) emissions events as soon as practicable but no later than two weeks after the end of the emissions events. NO Classification: Moderate 30 TAC Chapter 101, SubChapter A 101.20(3) 30 TAC Chapter 101, 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) PSDTX 1448, GC 14 PA PSDTX 1448, GC 14 PA PSDTX 1448, SC 1 PERMIT
Citation: Description: Self Report? Citation: Description: Self Report?	placed back into volatile organic compound (VOC) service. NO Classification: Moderate 30 TAC Chapter 122, SubChapter B 122.143(4) SC THSC Chapter 382 382.058(b) ST&C 15 OP Failure to conduct visible emissions observations once per calendar quarter. NO Classification: Moderate 30 TAC Chapter 101, SubChapter F 101.201(b) 30 TAC Chapter 122, SubChapter B 122.143(4) SC THSC Chapter 382 382.085(b) ST&C 2(F) OP Failure to create complete final records of all non-reportable (recordable) emissions events as soon as practicable but no later than two weeks after the end of the emissions events. NO Classification: Moderate 30 TAC Chapter 101, SubChapter A 101.20(3) 30 TAC Chapter 101, 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) SC THSC Chapter 382 382.085(b) PSDTX 1448, GC 14 PA PSDTX 1448, GC 8 PERMIT

	Self Report? Citation:	NO For Information Classification: Moderate 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) GT&C OP		
	Description:	Failure to report all instances of deviations.		
56	Date: 09/3	30/2020 (1693256)		
	Self Report?	YES For Informational PClassification: On Moderate		
	Citation:	YES For Informational PClassification: Moderate 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		
* NOVs applicable for the Compliance History rating period 9/1/2015 to 8/31/2020				

## Appendix B All Investigations Conducted During Component Period January 11, 2016 and January 11, 2021

Item 1*	January 15, 2016**	(1288802)	Durrance Only
Item 2	January 19, 2016**		Purposes Only
Item 3*	February 08, 2016**	For <sup>(1315628)</sup> mational	Purposes Only
Item 4	February 17, 2016**	For <sup>(1308369)</sup> mational	Purposes Only
Item 5*	March 17, 2016**	For <sup>(1325020)</sup> mational	Purposes Only
Item 6*	March 23, 2016**	For <sup>(1331749)</sup> mational	Purposes Only
Item 7*	April 19, 2016**	For <sup>(1314458)</sup> mational	Purposes Only
Item 8*	May 16, 2016**	For <sup>(1338912)</sup> mational	Purposes Only
Item 9	May 31, 2016**	For <sup>(1345712)</sup> mational For <sup>(1308014)</sup> mational	Purposes Only
Item 10*	June 17, 2016**	For <sup>(1338085)</sup> mational	Purposes Only
Item 11*	June 21, 2016**	For <sup>(1338726)</sup> mational	Purposes Only
Item 12	June 22, 2016**	For <sup>(1329329)</sup> mational	Purposes Only
Item 13	July 14, 2016**	For <sup>(1359128)</sup> mational	Purposes Only
Item 14*	July 25, 2016**	For <sup>(1344859)</sup> mational	Purposes Only
Item 15*	July 28, 2016**	For <sup>(1349096)</sup> mational	Purposes Only
Item 16*	August 02, 2016**	For <sup>(1349188)</sup> mational	Purposes Only
Item 17	August 03, 2016**	For <sup>(1349366)</sup> mational	Purposes Only
Item 18*	August 04, 2016**	For <sup>(1349169)</sup> mational	Purposes Only
Item 19*	August 16, 2016**	For <sup>(1275931)</sup> mational	Purposes Only
Item 20*	August 18, 2016**	For <sup>(1365552)</sup> mational	Purposes Only
Item 21	August 23, 2016**	For <sup>(1338121)</sup> mational	Purposes Only
Item 22*	August 26, 2016**	For <sup>(1342188)</sup> mational	
Item 23	August 30, 2016**	For <sup>(1349175)</sup> mational	Purposes Only
Item 24	August 31, 2016**	For <sup>(1355247)</sup> mational	Purposes Only
Item 25*	September 16, 2016**	For <sup>(1372253)</sup> mational	
Item 26	September 28, 2016**	For <sup>(1357771)</sup> mational	Purposes Only
Item 27*	September 30, 2016**	For <sup>(1363528)</sup> mational	Purposes Only
Item 28*	October 18, 2016**	For <sup>(1378430)</sup> mational	Purposes Only
Item 29*	October 25, 2016**	For <sup>(1364733)</sup> mational	Purposes Only
Item 30*	November 10, 2016**	For <sup>(1371863)</sup> mational	Purposes Only
Item 31*	November 17, 2016**	For <sup>(1384389)</sup> mational	Purposes Only
Item 32	November 29, 2016**	For <sup>(1370328)</sup> mational	Purposes Only
Item 33*	December 13, 2016**	For <sup>(1390527)</sup> mational	Purposes Only
Item 34	December 16, 2016**	For <sup>(1357800)</sup> mational	Purposes Only
Item 35	January 05, 2017**	For <sup>(1370561)</sup> mational	Purposes Only
Item 36*	January 17, 2017**	For <sup>(1397143)</sup> mational	Purposes Only
Item 37	January 20, 2017**	For <sup>(1370039)</sup> mational	Purposes Only
Item 38	January 25, 2017**	For <sup>(1370038)</sup> mational	Purposes Only
Item 39*	January 26, 2017**	For <sup>(1387943)</sup> mational	Purposes Only
Item 40*	February 14, 2017**	For <sup>(1393753)</sup> mational	Purposes Only

Item 41*	February 16, 2017**	For <sup>(1377914)</sup> mational	Purposes Only
Item 42*	February 20, 2017**	For <sup>(1370290)</sup> mational	Purposes Only
Item 43	March 09, 2017**	For <sup>(1411128)</sup> mational	Purposes Only
Item 44	March 14, 2017**	For <sup>(1357499)</sup> mational	Purposes Only
Item 45*	March 22, 2017**	For <sup>(1401605)</sup> mational	Purposes Only
Item 46*	April 11, 2017**	For <sup>(1383077)</sup> mational	Purposes Only
Item 47*	April 14, 2017**	For <sup>(1402007)</sup> mational	Purposes Only
Item 48	April 19, 2017**	For <sup>(1402109)</sup> mational	Purposes Only
Item 49	April 21, 2017**	For <sup>(1402111)</sup> mational	Purposes Only
Item 50*	May 18, 2017**	For <sup>(1425220)</sup> mational	Purposes Only
Item 51	May 19, 2017**	For <sup>(1409010)</sup> mational	Purposes Only
Item 52*	May 25, 2017**	For <sup>(1400959)</sup> mational	Purposes Only
Item 53*	June 01, 2017**	For <sup>(1416000)</sup> mational	Purposes Only
Item 54*	June 13, 2017**	For <sup>(1416112)</sup> mational	Purposes Only
Item 55	July 07, 2017**	For <sup>(1422568)</sup> mational	Purposes Only
Item 56*	July 16, 2017**	For <sup>(1423925)</sup> mational	Purposes Only
Item 57	July 19, 2017**	For <sup>(1439832)</sup> mational	Purposes Only
Item 58*	July 24, 2017**	For <sup>(1396487)</sup> mational	Purposes Only
Item 59	July 28, 2017**	For <sup>(1420813)</sup> mational	Purposes Only
Item 60*	August 01, 2017**	For <sup>(1429972)</sup> mational	Purposes Only
Item 61*	August 04, 2017**	For <sup>(1401463)</sup> mational	Purposes Only
Item 62*	August 18, 2017**	For <sup>(1443520)</sup> mational	Purposes Only
Item 63	August 21, 2017**	For <sup>(1424158)</sup> mational	Purposes Only
Item 64*	August 29, 2017**	For <sup>(1435824)</sup> mational	Purposes Only
Item 65	August 31, 2017**	For <sup>(1429815)</sup> mational	Purposes Only
Item 66*	September 12, 2017**		Purposes Only
Item 67*	September 20, 2017**	For <sup>(1450147)</sup> mational	Purposes Only
Item 68*	October 18, 2017**	For <sup>(1455967)</sup> mational	Purposes Only
Item 69*	November 14, 2017**	For <sup>(1461448)</sup> mational	Purposes Only
Item 70	December 11, 2017**	For <sup>(1430479)</sup> mational	Purposes Only
Item 71*	December 14, 2017**	For <sup>(1442855)</sup> mational	Purposes Only
Item 72*	December 19, 2017**	For <sup>(1467827)</sup> mational	Purposes Only
Item 73*	January 16, 2018**	For <sup>(1474532)</sup> mational	Purposes Only
Item 74	February 16, 2018**	For <sup>(1486758)</sup> mational	Purposes Only
Item 75	March 19, 2018**	For <sup>(1490435)</sup> mational	Purposes Only
Item 76*	April 06, 2018**	For <sup>(1435175)</sup> mational	Purposes Only
Item 77*	April 18, 2018**	For <sup>(1493672)</sup> mational	Purposes Only
Item 78*	May 04, 2018**	For <sup>(1482739)</sup> mational	Purposes Only
Item 79* Item 80	May 17, 2018**	For <sup>(1500590)</sup> mational	Purposes Only
Item 81*	May 24, 2018** June 11, 2018**	For <sup>(1478976)</sup> mational	Purposes Only
Item 82*	June 14, 2018**	For <sup>(1486276)</sup> mational	Purposes Only
	Sanc 1 1, 2010	For <sup>(1507707)</sup> mational	Purposes Only

Item 83	June 29, 2018**	For <sup>(1483974)</sup> mational	Purposes Only
Item 84	July 11, 2018**	For <sup>(1489984)</sup> mational	Purposes Only
Item 85*	July 18, 2018**	For <sup>(1514024)</sup> mational	Purposes Only
Item 86*	August 02, 2018**	For <sup>(1506476)</sup> mational	Purposes Only
Item 87	August 17, 2018**	(1_400070)	Purposes Only
Item 88*	August 20, 2018**	For <sup>(1520086)</sup> mational	1 /
Item 89*	August 27, 2018**	For <sup>(1512265)</sup> mational	
Item 90	September 05, 2018**		Purposes Only
Item 91*	September 20, 2018**	For <sup>(1527251)</sup> mational	
Item 92*	September 28, 2018**	For <sup>(1513672)</sup> mational	Purposes Only
Item 93*	October 01, 2018**	For <sup>(1513685)</sup> mational	Purposes Only
Item 94*	October 11, 2018**	For <sup>(1519563)</sup> mational	Purposes Only
Item 95*	October 17, 2018**	For <sup>(1533609)</sup> mational	Purposes Only
Item 96	October 24, 2018**	For <sup>(1512369)</sup> mational	Purposes Only
Item 97	November 14, 2018**	For <sup>(1541444)</sup> mational	Purposes Only
Item 98*	November 29, 2018**	For <sup>(1525087)</sup> mational	Purposes Only
Item 99	December 19, 2018**	For <sup>(1545228)</sup> mational	Purposes Only
Item 100*	January 14, 2019**	For <sup>(1532406)</sup> mational	Purposes Only
Item 101*	January 17, 2019**	For <sup>(1559659)</sup> mational	Purposes Only
Item 102*	January 24, 2019**	For <sup>(1539278)</sup> mational	Purposes Only
Item 103	January 29, 2019**	For <sup>(1500318)</sup> mational	Purposes Only
Item 104	February 01, 2019**	For <sup>(1540328)</sup> mational	Purposes Only
Item 105*	February 19, 2019**	For <sup>(1559657)</sup> mational	Purposes Only
Item 106*	February 25, 2019**	For <sup>(1549775)</sup> mational	Purposes Only
Item 107*	March 18, 2019**	(1 = = 0 < = 2)	Purposes Only
Item 108*	March 29, 2019**	For <sup>(1551550)</sup> mational	Purposes Only
Item 109*	April 18, 2019**	For <sup>(1571825)</sup> mational	Purposes Only
Item 110*	May 20, 2019**	For <sup>(1583259)</sup> mational	Purposes Only
Item 111*	May 28, 2019**	For <sup>(1569602)</sup> mational	Purposes Only
Item 112*	May 30, 2019**	For <sup>(1553423)</sup> mational	Purposes Only
Item 113	June 19, 2019**	For <sup>(1557608)</sup> mational	Purposes Only
Item 114*	June 21, 2019**	For <sup>(1575818)</sup> mational	Purposes Only
Item 115	June 25, 2019**	For <sup>(1571573)</sup> mational	Purposes Only
Item 116	June 26, 2019**	For <sup>(1571669)</sup> mational	Purposes Only
Item 117*	June 28, 2019**	For <sup>(1570896)</sup> mational	Purposes Only
Item 118*	July 02, 2019**	For <sup>(1578105)</sup> mational	Purposes Only
Item 119*	July 11, 2019**	For <sup>(1575847)</sup> mational	Purposes Only
Item 120*	July 19, 2019**	For <sup>(1593138)</sup> mational	Purposes Only
Item 121*	August 01, 2019**	For <sup>(1580321)</sup> mational	Purposes Only
Item 122*	August 07, 2019**	For <sup>(1579874)</sup> mational	Purposes Only
Item 123	August 08, 2019**	For <sup>(1578969)</sup> mational	Purposes Only
Item 124	August 15, 2019**	For <sup>(1599484)</sup> mational	Purposes Only

Item 125	August 23, 2019**	For <sup>(1582081)</sup> mational	Purposes Only
Item 126	August 29, 2019**	For <sup>(1590970)</sup> mational	Purposes Only
Item 127	August 30, 2019**	For <sup>(1557529)</sup> mational	Purposes Only
Item 128	September 18, 2019**	For <sup>(1606389)</sup> mational	Purposes Only
Item 129*	October 17, 2019**	(1612225)	Purposes Only
Item 130*	November 01, 2019**	For <sup>(1604022)</sup> mational	
Item 131	November 19, 2019**	For <sup>(1619049)</sup> mational	Purposes Only
Item 132	December 12, 2019**	For <sup>(1604859)</sup> mational	Purposes Only
Item 133*	December 19, 2019**	For <sup>(1626401)</sup> mational	Purposes Only
Item 134	January 16, 2020**	For <sup>(1634042)</sup> mational	Purposes Only
Item 135*	February 18, 2020**	For <sup>(1640661)</sup> mational	Purposes Only
Item 136*	March 18, 2020**	For <sup>(1647181)</sup> mational	Purposes Only
Item 137	March 27, 2020**	For <sup>(1623002)</sup> mational	Purposes Only
Item 138*	April 17, 2020**	For <sup>(1653517)</sup> mational	Purposes Only
Item 139	May 18, 2020**	For <sup>(1660104)</sup> mational	Purposes Only
Item 140*	May 27, 2020**	For <sup>(1651341)</sup> mational	Purposes Only
Item 141	May 29, 2020**	For <sup>(1644596)</sup> mational	Purposes Only
Item 142*	June 18, 2020**	For <sup>(1666608)</sup> mational	Purposes Only
Item 143*	June 26, 2020**	For <sup>(1657712)</sup> mational	Purposes Only
Item 144*	June 29, 2020**	For <sup>(1658245)</sup> mational	Purposes Only
Item 145*	July 16, 2020**	For <sup>(1673565)</sup> mational	Purposes Only
Item 146*	July 29, 2020**	For <sup>(1665306)</sup> mational	Purposes Only
Item 147*	August 05, 2020**	For <sup>(1665506)</sup> mational	Purposes Only
Item 148	August 14, 2020**	For <sup>(1670152)</sup> mational	Purposes Only
Item 149	August 17, 2020**	(16E0E2E)	Purposes Only
Item 150	August 20, 2020**	For <sup>(1658179)</sup> mational	Purposes Only
Item 151*	August 25, 2020**	For <sup>(1650930)</sup> mational	Purposes Only
Item 152	August 26, 2020**	For <sup>(1670055)</sup> mational	Purposes Only
Item 153	August 28, 2020**	For <sup>(1624119)</sup> mational	Purposes Only
Item 154*	August 31, 2020**	For <sup>(1671744)</sup> mational	Purposes Only
Item 155*	September 17, 2020	For <sup>(1686909)</sup> mational	Purposes Only
Item 156*	September 25, 2020	For <sup>(1678190)</sup> mational	Purposes Only
Item 157*	October 06, 2020	For <sup>(1679294)</sup> mational	Purposes Only
Item 158	October 15, 2020	For <sup>(1693256)</sup> mational	Purposes Only
Item 159*	October 20, 2020	For <sup>(1679423)</sup> mational	Purposes Only
Item 160*	October 26, 2020	For <sup>(1684969)</sup> mational	Purposes Only
Item 161*	November 13, 2020	For <sup>(1685140)</sup> mational	Purposes Only
Item 162*	November 17, 2020	For <sup>(1686149)</sup> mational	Purposes Only
Item 163*	December 03, 2020	For <sup>(1691410)</sup> mational	Purposes Only
Item 164*	December 09, 2020	For <sup>(1678701)</sup> mational	Purposes Only
Item 165*	December 15, 2020	For <sup>(1691806)</sup> mational	Purposes Only
Item 166	December 16, 2020	For <sup>(1691809)</sup> mational	Purposes Only

\* No violations documented during this investigation

\*\*Investigation applicable for the Compliance History Rating period between 09/01/2015 and 08/31/2020.



# Compliance History Report

Customer, Respondent, or Owner/Operator:	CN602582231, Inv Performance Sur LLC	rfaces,	Classification: SATISFACTORY	<b>Rating:</b> 5.44
<b>Regulated Entity:</b>	RN102663671, INV NYLON CHEMIC/ AMERICAS VICTORIA SITE	ALS	Classification: SATISFACTORY	<b>Rating:</b> 7.65
<b>Complexity Points:</b>	52		Repeat Violator: NO	
CH Group:	05 - Chemical Manufacturing			
Location:	2695 OLD BLOOMINGTON RD NORT	H NEA	R VICTORIA, VICTORIA COUNTY, TX	
TCEQ Region:	REGION 14 - CORPUS CHRISTI			
ID Number(s): AIR OPERATING PERMITS AIR OPERATING PERMITS AIR OPERATING PERMITS PUBLIC WATER SYSTEM/S 2350014	PERMIT 1902 ACCOUNT NUMBER VCA001A	AIR C AIR C	DPERATING PERMITS PERMIT 1415 DPERATING PERMITS PERMIT 1904 DPERATING PERMITS ACCOUNT NUMB NEW SOURCE PERMITS PERMIT 809	BER VC0008Q
AIR NEW SOURCE PERMIT			IEW SOURCE PERMITS PERMIT 812	
AIR NEW SOURCE PERMIT			IEW SOURCE PERMITS PERMIT 7186	
AIR NEW SOURCE PERMIT AIR NEW SOURCE PERMIT			IEW SOURCE PERMITS PERMIT 9560 IEW SOURCE PERMITS PERMIT 23271	1
AIR NEW SOURCE PERMIT			IEW SOURCE PERMITS PERMIT 2327	
AIR NEW SOURCE PERMIT			IEW SOURCE PERMITS REGISTRATIO	
AIR NEW SOURCE PERMIT			IEW SOURCE PERMITS REGISTRATIO	
AIR NEW SOURCE PERMIT	<b>S</b> REGISTRATION 45256		IEW SOURCE PERMITS REGISTRATIO	N 47610
AIR NEW SOURCE PERMIT	S ACCOUNT NUMBER VC0008Q	AIR N	IEW SOURCE PERMITS AFS NUM 484	6900001
AIR NEW SOURCE PERMIT	S REGISTRATION 71504	AIR N	IEW SOURCE PERMITS REGISTRATIO	N 71789
AIR NEW SOURCE PERMIT	<b>S</b> REGISTRATION 56688	AIR N	IEW SOURCE PERMITS REGISTRATIO	N 73896
AIR NEW SOURCE PERMIT			IEW SOURCE PERMITS REGISTRATIO	
AIR NEW SOURCE PERMIT			IEW SOURCE PERMITS EPA PERMIT P	
AIR NEW SOURCE PERMIT			IEW SOURCE PERMITS REGISTRATIO	
AIR NEW SOURCE PERMIT			IEW SOURCE PERMITS REGISTRATIO IEW SOURCE PERMITS REGISTRATIO	
AIR NEW SOURCE PERMIT			IEW SOURCE PERMITS REGISTRATIO	
AIR NEW SOURCE PERMIT			IEW SOURCE PERMITS REGISTRATIO	
AIR NEW SOURCE PERMIT			IEW SOURCE PERMITS REGISTRATIO	
AIR NEW SOURCE PERMIT			IEW SOURCE PERMITS REGISTRATIO	
AIR NEW SOURCE PERMIT	<b>S</b> REGISTRATION 141367		IEW SOURCE PERMITS REGISTRATIO	N 105010
AIR NEW SOURCE PERMIT	S REGISTRATION 131067		IEW SOURCE PERMITS REGISTRATIO	N 111679
AIR NEW SOURCE PERMIT	S REGISTRATION 119719	AIR N	IEW SOURCE PERMITS EPA PERMIT G	HGPSDTX129
AIR NEW SOURCE PERMIT	<b>S</b> EPA PERMIT PSDTX1079M2	AIR N	IEW SOURCE PERMITS REGISTRATIO	N 131268
AIR NEW SOURCE PERMIT			IEW SOURCE PERMITS REGISTRATIO	
			IEW SOURCE PERMITS REGISTRATIO	
AIR NEW SOURCE PERMIT			IEW SOURCE PERMITS EPA PERMIT P	
AIR NEW SOURCE PERMIT AIR NEW SOURCE PERMIT			IEW SOURCE PERMITS REGISTRATIO IEW SOURCE PERMITS REGISTRATIO	
AIR NEW SOURCE PERMIT			IEW SOURCE PERMITS REGISTRATIO	
AIR NEW SOURCE PERMIT			IEW SOURCE PERMITS REGISTRATIO	
AIR NEW SOURCE PERMIT			IEW SOURCE PERMITS REGISTRATIO	
AIR NEW SOURCE PERMIT			IEW SOURCE PERMITS REGISTRATIO	
AIR NEW SOURCE PERMIT			IEW SOURCE PERMITS REGISTRATIO	
AIR NEW SOURCE PERMIT	<b>S</b> REGISTRATION 134439		IEW SOURCE PERMITS REGISTRATIO	N 112388
AIR NEW SOURCE PERMIT	S PERMIT AMOC58		IEW SOURCE PERMITS REGISTRATIO	N 154387

AIR NEW SOURCE PERMITS REGISTRATION 151197	AIR NEW SOURCE PERMITS REGISTRATION 154192		
AIR NEW SOURCE PERMITS REGISTRATION 151513	AIR NEW SOURCE PERMITS PERMIT AMOC64		
AIR NEW SOURCE PERMITS REGISTRATION 162812	AIR NEW SOURCE PERMITS REGISTRATION 162811		
AIR NEW SOURCE PERMITS REGISTRATION 162112	AIR NEW SOURCE PERMITS REGISTRATION 162916		
AIR NEW SOURCE PERMITS REGISTRATION 161725	AIR NEW SOURCE PERMITS REGISTRATION 162330		
AIR NEW SOURCE PERMITS REGISTRATION 163343	AIR NEW SOURCE PERMITS REGISTRATION 163344		
AIR NEW SOURCE PERMITS REGISTRATION 163737	AIR NEW SOURCE PERMITS REGISTRATION 163502		
AIR NEW SOURCE PERMITS REGISTRATION 164298	AIR NEW SOURCE PERMITS REGISTRATION 162329		
AIR NEW SOURCE PERMITS REGISTRATION 163531	AIR NEW SOURCE PERMITS REGISTRATION 163730		
AIR NEW SOURCE PERMITS REGISTRATION 163501	AIR NEW SOURCE PERMITS REGISTRATION 163880		
AIR NEW SOURCE PERMITS REGISTRATION 163030	AIR NEW SOURCE PERMITS REGISTRATION 163729		
AIR NEW SOURCE PERMITS REGISTRATION 163881	AIR NEW SOURCE PERMITS REGISTRATION 162917		
AIR NEW SOURCE PERMITS REGISTRATION 144089	AIR NEW SOURCE PERMITS REGISTRATION 147282		
AIR NEW SOURCE PERMITS REGISTRATION 146503	AIR NEW SOURCE PERMITS REGISTRATION 147180		
AIR NEW SOURCE PERMITS EPA PERMIT	AIR NEW SOURCE PERMITS REGISTRATION 146876		
GHGPSDTX145M1 AIR NEW SOURCE PERMITS EPA PERMIT GHGPSDTX160	AIR NEW SOURCE PERMITS REGISTRATION 156653		
AIR NEW SOURCE PERMITS REGISTRATION 159010	AIR NEW SOURCE PERMITS REGISTRATION 160437		
AIR NEW SOURCE PERMITS REGISTRATION 160761	AIR NEW SOURCE PERMITS REGISTRATION 159739		
AIR NEW SOURCE PERMITS REGISTRATION 161663	AIR NEW SOURCE PERMITS REGISTRATION 160438		
AIR NEW SOURCE PERMITS REGISTRATION 155252	AIR NEW SOURCE PERMITS REGISTRATION 154311		
AIR NEW SOURCE PERMITS REGISTRATION 157983	AIR NEW SOURCE PERMITS REGISTRATION 156654		
AIR NEW SOURCE PERMITS REGISTRATION 154819	PETROLEUM STORAGE TANK REGISTRATION		
PETROLEUM STORAGE TANK REGISTRATION	REGISTRATION 24717 IHW CORRECTIVE ACTION SOLID WASTE REGISTRATION		
REGISTRATION 90505	# (SWR) 30079		
UNDERGROUND INJECTION CONTROL PERMIT WDW004	UNDERGROUND INJECTION CONTROL PERMIT WDW028		
UNDERGROUND INJECTION CONTROL PERMIT WDW029	UNDERGROUND INJECTION CONTROL PERMIT WDW030		
UNDERGROUND INJECTION CONTROL PERMIT WDW105	UNDERGROUND INJECTION CONTROL PERMIT WDW106		
UNDERGROUND INJECTION CONTROL PERMIT WDW142	UNDERGROUND INJECTION CONTROL PERMIT WDW143		
UNDERGROUND INJECTION CONTROL PERMIT WDW144			
WASTEWATER EPA ID TX0006050	AIR EMISSIONS INVENTORY ACCOUNT NUMBER VC00080		
POLLUTION PREVENTION PLANNING ID NUMBER	INDUSTRIAL AND HAZARDOUS WASTE EPA ID		
INDUSTRIAL AND HAZARDOUS WASTE PERMIT 50393 INDUSTRIAL AND HAZARDOUS WASTE SOLID WASTE	INDUSTRIAL AND HAZARDOUS WASTE PERMIT 50056		
REGISTRATION # (SWR) 87449	TAX RELIEF ID NUMBER 16591		
TAX RELIEF ID NUMBER 20128	TAX RELIEF ID NUMBER 16929		
TAX RELIEF ID NUMBER 17849	TAX RELIEF ID NUMBER 23356		
TAX RELIEF ID NUMBER 16589	TAX RELIEF ID NUMBER 20129		
TAX RELIEF ID NUMBER 16734	TAX RELIEF ID NUMBER 18582		
TAX RELIEF ID NUMBER 16590	TAX RELIEF ID NUMBER 16592		
Compliance History Period: September 01, 2015 to Augu	Ist 31, 2020 Rating Year: 2020 Rating Date: 09/01/2020		
Date Compliance History Report Prepared: May 12, 2021			
Agency Decision Requiring Compliance History: Er	nforcement		
Component Period Selected: May 12, 2016 to May 12,	2021		

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

Name: Yuliya Dunaway

**Phone:** (210) 403-4077

# Site and Owner/Operator History:

1) Has the site been in existence and/or operation for the full five year compliance period?YESYESYES

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: 07/12/2017 ADMINORDER 2015-1398-WDW-E (1660 Order-Agreed Order With Denial) Classification: Moderate Citation: 30 TAC Chapter 331, SubChapter D 331.64(b) 40 CFR Chapter 146, SubChapter D, PT 146, SubPT G 146.68(a) Rgmt Prov: PP. VIII.G. OP Description: Failed to monitor the specific gravity of injected waste in WDW 105 at least once every 24 hours Classification: Moderate Citation: 30 TAC Chapter 331, SubChapter D 331.63(e) 40 CFR Chapter 146, SubChapter D, PT 146, SubPT G 146.67(c) Rqmt Prov: PERMIT PP. VII. OPERATING PARAMETERS PERMIT PP.VII.F OP Description: Failed to maintain a positive pressure of 100 pounds per square inch gauge ("psig") over tubing injection pressure in the tubing-casing annulus in WDW 004 028, 105, 106, 142, 143, and 144 without dropping below this pressure differential for greater than 15 minutes Classification: Moderate Citation: 30 TAC Chapter 305, SubChapter F 305.125 30 TAC Chapter 331, SubChapter D 331.64(d) 30 TAC Chapter 331, SubChapter D 331.67(a) 40 CFR Chapter 146, SubChapter D, PT 146, SubPT G 146.67(f) Rgmt Prov: PP. VIII. A. Monitoring and Testing Reg. PERMIT PP.VIII.A. Monitoring and Testing Reg. PERMIT Description: Failure to properly maintain and use continuous recording devices to record the injection pressure at WDW028 and WDW105. Classification: Minor Citation: 30 TAC Chapter 331, SubChapter D 331.67(a) Rgmt Prov: PP. IX. Record Keeping Requirements PERMIT PP.IX PERMIT Description: Failed to keep complete and accurate records of all monitoring Classification: Minor Citation: 30 TAC Chapter 331, SubChapter D 331.65(c)(1) 40 CFR Chapter 146, SubChapter D, PT 146, SubPT G 146.69(a) Description: Failed to comply with the quarterly reporting requirements for a Class I well injection operation Classification: Moderate Citation: 30 TAC Chapter 305, SubChapter F 305.125(1) Rqmt Prov: WDW144 Provision VII.F PERMIT Description: Failed to notify the TCEQ of the March 17, 2014 pressure deviation in the tubing-casing annulus in WDW 144 ADMINORDER 2017-0669-WDW-E (1660 Order-Agreed Order With Denial) 2 Effective Date: 01/16/2018 Classification: Major Citation: 30 TAC Chapter 331, SubChapter D 331.63(e) 40 CFR Chapter 146, SubChapter D, PT 146, SubPT G 146.67(c) Rqmt Prov: PP.VII.F. Operating Parameters PERMIT Description: Failed to maintain an annulus pressure of at least 100 psi greater than the injection tubing pressure to prevent leaks from the well into unauthorized zones and to detect well malfunctions Classification: Minor 30 TAC Chapter 305, SubChapter F 305.125(1) Citation: 30 TAC Chapter 331, SubChapter D 331.67(a) 40 CFR Chapter 146, SubChapter D, PT 146, SubPT G 146.67(f) Rgmt Prov: PP.IX. Record Keeping Requirements PERMIT Description: Failed to keep complete and accurate records of all monitoring 3 Effective Date: 07/25/2018 ADMINORDER 2017-0236-IHW-E (1660 Order-Agreed Order With Denial) Classification: Minor Citation: 30 TAC Chapter 305, SubChapter F 305.125(1) 30 TAC Chapter 335, SubChapter F 335.152(a)(8) 40 CFR Chapter 264, SubChapter I, PT 264, SubPT J 264.195(b) 40 CFR Chapter 264, SubChapter I, PT 264, SubPT J 264.195(c) Rqmt Prov: PP.III.D General Inspection Requirements PERMIT

Description: Failed to conduct daily inspections of permitted HW tanks and less than 90-day HW tanks Classification: Minor Citation: 30 TAC Chapter 305, SubChapter F 305.125(1) 30 TAC Chapter 335, SubChapter F 335.152(a)(1) 40 CFR Chapter 264, SubChapter I, PT 264, SubPT B 264.15(d) 40 CFR Chapter 265, SubChapter I, PT 265, SubPT B 265.15(d) Rqmt Prov: PP.III.D General Inspection Requirements PERMIT Description: Failed to properly record inspections in an inspection log or summary Classification: Moderate Citation: 30 TAC Chapter 305, SubChapter F 305.125(1) 30 TAC Chapter 335, SubChapter F 335.152(a)(7) 40 CFR Chapter 264, SubChapter I, PT 264, SubPT I 264.171 Rgmt Prov: PP.V.B.2 Container Storage Areas PERMIT Description: Failed to properly manage containers holding HW Classification: Moderate Citation: 30 TAC Chapter 335, SubChapter C 335.69(a)(1)(B) 40 CFR Chapter 265, SubChapter I, PT 265, SubPT J 265.193(e)(1)(iii) Description: Failed to maintain the external liners of secondary containment systems free of cracks and gaps Classification: Moderate Citation: 30 TAC Chapter 335, SubChapter E 335.112(a)(9) 40 CFR Chapter 265, SubChapter I, PT 265, SubPT J 265.193(e)(3)(ii) Description: Failed to protect a double-walled tank system, if constructed of metal, from both corrosion of the primary tank interior and the external surface of the outer shell Classification: Minor Citation: 30 TAC Chapter 335, SubChapter C 335.69(a)(3) 30 TAC Chapter 335, SubChapter C 335.69(d)(2) 40 CFR Chapter 262, SubChapter I, PT 262, SubPT C 262.34(a)(3) 40 CFR Chapter 262, SubChapter I, PT 262, SubPT C 262.34(c)(1)(ii) Description: Failed to clearly label all HW containers with the words "Hazardous Waste" Classification: Moderate Citation: 30 TAC Chapter 335, SubChapter C 335.69(d)(1) 40 CFR Chapter 262, SubChapter I, PT 262, SubPT C 262.34(c)(1)(i) 40 CFR Chapter 265, SubChapter I, PT 265, SubPT I 265.173(a) Description: Failed to keep a container storing HW closed except when adding or removing waste Classification: Minor Citation: 30 TAC Chapter 335, SubChapter A 335.6(c) Description: Failed to update the Facility's NOR Classification: Minor Citation: 30 TAC Chapter 335, SubChapter A 335.10(a) 40 CFR Chapter 262, SubChapter I, PT 262, SubPT B 262.20(a)(1) Description: Failed to properly complete an HW manifest Effective Date: 05/13/2019 ADMINORDER 2018-0096-AIR-E (1660 Order-Agreed Order With Denial) Classification: Moderate Citation: 30 TAC Chapter 101, SubChapter A 101.20(3) 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: SC 14 PERMIT STC 14 OP STC 16 OP Description: Failure to perform daily visible emissions observations when the associated baghouse and particulate scrubbers are in operation.

See addendum for information regarding federal actions.

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

N/A

4

C. Chronic excessive emissions events:

N/A

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

The app	roval dates of inve	estigations (CCEDS Ir
Item 1	May 16, 2016	(1345712)
Item 2	June 17, 2016	(1338085)
Item 3	June 21, 2016	(1338726)
Item 4	July 25, 2016	(1344859)
Item 5	July 28, 2016	(1349096)
Item 6	August 02, 2016	(1349188)
Item 7	August 04, 2016	(1349169)
Item 8	August 16, 2016	(1275931)
Item 9	August 18, 2016	(1365552)
Item 10	August 26, 2016	(1342188)
Item 11	September 16, 2	
Item 12	September 30, 2	
Item 13	October 18, 2016	
Item 14	October 25, 2016	
Item 15	November 10, 20	
Item 16	November 17, 20	
Item 17	December 13, 20	
Item 18	January 17, 2017	
Item 19	January 26, 2017	
Item 20	February 14, 201	
Item 21	February 16, 201	
Item 22	February 20, 201	
Item 23	March 22, 2017	(1401605)
Item 24	April 11, 2017	(1383077)
Item 25	April 14, 2017	(1402007)
Item 26	April 19, 2017	(1417631)
Item 27 Item 28	May 18, 2017 May 25, 2017	(1425220)
Item 29	June 01, 2017	(1400959) (1416000)
Item 30	June 13, 2017	(1416000)
Item 31	July 16, 2017	(1423925)
Item 32	July 24, 2017	(1396487)
Item 33	July 28, 2017	(1425002)
Item 34	August 01, 2017	(1429972)
Item 35	August 04, 2017	(1401463)
Item 36	August 18, 2017	(1443520)
Item 37	August 29, 2017	(1435824)
Item 38	September 12, 2	· ,
Item 39	September 20, 2	
Item 40	October 18, 2017	· ,
Item 41	November 14, 20	)17 (1461448)
Item 42	December 14, 20	(1442855)
Item 43	December 19, 20	(1467827)
Item 44	January 16, 2018	3 (1474532)
Item 45	April 06, 2018	(1435175)
Item 46	April 18, 2018	(1493672)
Item 47	May 04, 2018	(1482739)
Item 48	May 17, 2018	(1500590)
Item 49	June 11, 2018	(1486276)
Item 50	June 14, 2018	(1507707)
Item 51	July 18, 2018	(1514024)
Item 52	August 02, 2018	(1506476)
Item 53	August 20, 2018	(1520086)
Item 54	August 27, 2018	(1512265)
Item 55	September 20, 2	
Item 56	September 28, 2	
Item 57	October 01, 2018	
Item 58	October 11, 2018	
Item 59	October 17, 2018	3 (1533609)

Item 60	October 24, 2018	(1519338)
Item 61	November 29, 2018	(1525087)
Item 62	January 14, 2019	(1532406)
Item 63	January 17, 2019	(1559659)
Item 64	January 24, 2019	(1539278)
Item 65	February 19, 2019	(1559657)
Item 66	February 25, 2019	(1549775)
Item 67	March 18, 2019	(1559658)
Item 68	March 29, 2019	(1551550)
Item 69	April 18, 2019	(1571825)
Item 70	May 20, 2019	(1583259)
Item 71	May 28, 2019	(1569602)
Item 72	May 30, 2019	(1553423)
Item 73	June 19, 2019	(1583260)
Item 74	June 21, 2019	(1575818)
Item 75	June 28, 2019	(1570896)
Item 76	July 02, 2019	(1578105)
Item 77	July 11, 2019	(1575847)
Item 78	July 19, 2019	(1593138)
Item 79	August 01, 2019	(1580321)
Item 80	August 07, 2019	(1579874)
Item 81	August 08, 2019	(1580982)
Item 82	October 17, 2019	(1613235)
Item 83	November 01, 2019	(1604022)
Item 84	December 12, 2019	(1611822)
Item 85	December 19, 2019	(1626401)
Item 86	February 18, 2020	(1640661)
Item 87	March 18, 2020	(1647181)
Item 88	April 17, 2020	(1653517)
Item 89	May 27, 2020	(1651341)
Item 90	June 18, 2020	(1666608)
Item 91	June 26, 2020	(1657712)
Item 92	June 29, 2020	(1658245)
Item 93	July 16, 2020	(1673565)
Item 94	July 29, 2020	(1665306)
Item 95	August 05, 2020	(1665506)
Item 96	August 17, 2020	(1680340)
Item 97	August 25, 2020	(1650930)
Item 98	August 31, 2020	(1671744)
Item 99	September 17, 2020	(1686909)
Item 100	September 25, 2020	(1678190)
Item 101	October 06, 2020	(1679294)
Item 102	October 20, 2020	(1679423)
Item 102	October 26, 2020	(1684969)
Item 104	November 12, 2020	(1712458)
Item 101	November 13, 2020	(1685140)
Item 105	November 17, 2020	(1686149)
Item 100 Item 107	December 03, 2020	(1691410)
Item 107	December 09, 2020	(1678701)
Item 108	December 15, 2020	(1691806)
Item 109	December 16, 2020	(1712459)
Item 111	January 18, 2021	(1712439) (1712460)
Item 112	March 03, 2021	(1712400) (1703786)
Item 112 Item 113	March 03, 2021 May 03, 2021	(1709524)
Item 113 Item 114	May 03, 2021 May 04, 2021	(1709524) (1710914)
11011114	nay 04, 2021	(1/10914)

## 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.

Date:	05/2	29/2020	(1644596)
Self Repor	rt?	NO	

1

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) GTC OP SC 7C PERMIT STC 15 OP STC 4E OP	
Description:	Failure to comply with time requirements for planned continu- monitoring system (CEMS) maintenance.	ous emissions
Self Report? Citation:	NO Classification: 30 TAC Chapter 111, SubChapter A 111.111(a)(1)(B) 30 TAC Chapter 116, SubChapter B 116.110 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) GTC OP SC 3 PA SC 3 PERMIT STC 15 OP STC 1A OP	Moderate
Description:	Failure to maintain opacity from a vent below 20% averaged	over a six-minute
Self Report? Citation:	period. NO Classification: 30 TAC Chapter 116, SubChapter B 116.115(c) 30 TAC Chapter 117, SubChapter F 117.4205 30 TAC Chapter 122, SubChapter B 122.143(4) 5C THSC Chapter 382 382.085(b) GTC OP SC 1 PERMIT STC 15 OP STC 1A OP	Moderate
Description:	Failure to maintain nitric acid production emissions of nitroge below 600 parts per million by volume.	n oxides (NOx)
Self Report? Citation:	NO Classification: 30 TAC Chapter 116, SubChapter B 116.115(b)(2)(F) 30 TAC Chapter 116, SubChapter B 116.115(c) 30 TAC Chapter 117, SubChapter F 117.4205 30 TAC Chapter 122, SubChapter B 122.143(4) 5C THSC Chapter 382 382.085(b) GTC OP SC 1 PERMIT STC 15 OP	Moderate
Description:	Failure to comply with the hourly NOx rate of the Maximum A Rates Table (MAERT) of NSR 809.	llowable Emission
Self Report? Citation:	NO Classification: 30 TAC Chapter 113, SubChapter C 113.620 30 TAC Chapter 116, SubChapter B 116.115(b) 30 TAC Chapter 116, SubChapter B 116.115(c) 30 TAC Chapter 122, SubChapter B 122.143(4) 30 TAC Chapter 122, SubChapter C, PT 63, SubPT EEE 63.1200 5C THSC Chapter 63, SubChapter C, PT 63, SubPT EEE 63.1200 5C THSC Chapter 382 382.085(b) GTC OP SC 5C4 PERMIT SC 5C5 PERMIT STC 15 OP STC 14 OP STC 1E OP	
Description: Self Report? Citation:	Failure to comply with 40 CFR Part 63, Subpart EEE. NO Classification: 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) GTC OP SC 6 PERMIT STC 15 OP	Moderate
Description: Self Report? Citation:	Failure to comply with special conditions of NSR 9560. NO Classification: 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) GTC OP SC 5B PERMIT STC 15 OP Page 7	Moderate

Description: Self Report? Citation:	Failure to comply with special conditions of NSR 9560. NO Classification: Moderate 30 TAC Chapter 116, SubChapter B 116.115(b) 30 TAC Chapter 116, SubChapter B 116.115(c) 30 TAC Chapter 122, SubChapter B 122.143(4) 30 TAC Chapter 122, SubChapter B 122.143(6) 40 CFR Chapter 63, SubChapter C, PT 63, SubPT EEE 63.1211(b) 5C THSC Chapter 382 382.085(b) GTC OP SC 5C4 PERMIT STC 15 OP
Description: Self Report? Citation:	STC 1E OP Failure to comply with 40 CFR Part 63, Subpart EEE. NO Classification: Moderate 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) GTC OP SC 1 PERMIT STC 15 OP
Description:	Failure to comply with the Maintenance, StartUp, and Shutdown Operations (MSS) hourly NH3 rate of MAERT of NSR 809.
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 63, SubChapter C, PT 63, SubPT H 63.167(a)(1) 5C THSC Chapter 382 382.085(b) GTC OP SC 12E PERMIT STC 15 OP
Description:	Failure to meet open-ended line (OEL) requirements. Specifically, Invista discovered five (5) OELs during the period. See DR1, deviation item number 16 and DR2, deviation item number 17.
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) GTC OP SC 11F PERMIT SC 12F PERMIT STC 15 OP
Description:	Failure to monitor all valves quarterly for fugitive emissions with approved gas analyzer.
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) GTC OP SC 11 PERMIT STC 15 OP
Description:	Failure to comply with special conditions of NSR 813.
Self Report? Citation:	NO Classification: Moderate 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 60.13 5C THSC Chapter 382 382.085(b) GTC OP SC 9 PERMIT STC 15 OP STC 4E OP
Description:	Failure to meet quarterly monitoring requirement for continuous emissions
Self Report?	monitoring system (CEMS) testing. 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) GTC OP SC 7C PERMIT STC 15 OP STC 4E OP
Description:	Failure to meet hourly monitoring requirement for continuous demonstration of
Self Report?	compliance. NO Classification: Moderate
	Page 8

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) GTC OP SC 1 PERMIT STC 15 OP
Description:	Failure to comply with the hourly N2O rate of the MAERT of NSR 812.
Date: 08/ Self Report? Citation: Description: Self Report? Citation: Description: Self Report? Citation:	<ul> <li>17/2020 (1659535)</li> <li>NO Classification: Moderate</li> <li>40 CFR Chapter 63, SubChapter C, PT 63, SubPT ZZZZ 63.6640</li> <li>5C THSC Chapter 382 382.085(b)</li> <li>FOP O-01902, Special Term &amp; Condition 1 OP</li> <li>Failure to comply with time limit usage of emergency engines.</li> <li>NO Classification: Moderate</li> <li>30 TAC Chapter 122, SubChapter B 122.143(4)</li> <li>40 CFR Chapter 82, SubChapter C, PT 82, SubPT F 82.161(a)(1)</li> <li>5C THSC Chapter 382 382.085(b)</li> <li>Failure to comply with certification requirements for operating Relief Valves (RVs).</li> <li>NO Classification: Moderate</li> <li>30 TAC Chapter 101, SubChapter A 101.20(1)</li> <li>30 TAC Chapter 113, SubChapter C 113.100</li> <li>30 TAC Chapter 116, SubChapter B 122.143(4)</li> </ul>
Description:	40 CFR Chapter 60, SubChapter C, PT 60, SubPT VV 60.482-6(a)(1) 40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.167(a)(1) 5C THSC Chapter 382 382.085(b) FOP 0-01902, Special Term & Condition 22 OP NSR 23271/PSDTX1416/PSDTX1079M2, SC 16E PERMIT Failure to prevent open-ended lines.
Self Report? Citation:	NO Classification: Moderate 30 TAC Chapter 101, SubChapter A 101.20(3) 30 TAC Chapter 116, SubChapter B 116.111 30 TAC Chapter 116, SubChapter B 116.115(c) 30 TAC Chapter 122, SubChapter B 122.143(4) 30 TAC Chapter 122, SubChapter B 122.144(1) 5C THSC Chapter 382 382.085(b) FOP O-01902, General Terms & Conditions OP FOP O-01902, Special Term & Condition 22 OP NSR 23271/PSDTX1416/PSDTX1079M2, SC 11D PERMIT NSR 23271/PSDTX1416/PSDTX1079M2, SC 18A PERMIT NSR 23271/PSDTX1416/PSDTX1079M2, SC 23 PERMIT NSR 23271/PSDTX1416/PSDTX1079M2, SC 7 PERMIT NSR 31376, SC 18 PERMIT
Description: Self Report? Citation:	Failure to maintain records as required by applicable state permit requirements. NO Classification: Moderate 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 0-01902, Special Term & Condition 22 OP NSR 31376, SC 10 PERMIT
Description:	Failure to conduct wastewater testing on a quarterly basis as required by the applicable state permit.
Self Report? Citation:	NOClassification:Moderate30 TAC Chapter 101, SubChapter A 101.20(3)30 TAC Chapter 116, SubChapter B 116.110(e)(2)30 TAC Chapter 116, SubChapter B 116.115(b)30 TAC Chapter 122, SubChapter B 122.143(4)5C THSC Chapter 382 382.085(b)FOP O-01902, Special Term & Condition 22 OPNSR 23271/PSDTX1416/PSDTX1079M2, GT&C 1 PERMIT
Description: Self Report? Citation:	Failure to operate as represented. NO Classification: Moderate 30 TAC Chapter 101, SubChapter A 101.20(3) 30 TAC Chapter 111, SubChapter A 111.111(a)(1)(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 O-01902, Special Term & Condition 3A OP NSR 23271/PSDTX1416/PSDTX1079M2, SC 3 PERMIT
Description:	Failure to conduct quarterly Method 9 observations.

	/20/2020 (1658179)
Self Report? Citation:	NO Classification: Moderate 2D TWC Chapter 26, SubChapter A 26.121(a)(1)
Citation.	30 TAC Chapter 305, SubChapter F 305.125(1)
	Permit Conditions; No. 2g, Pg. 7 PERMIT
Description:	Failed to prevent an unauthorized discharge of wastewater or any other waste.
Date: 08	/25/2020 (1657948)
Self Report?	NO Classification: Moderate
Citation:	1904 ST&C 1A OP
	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) 7186, SC 11 PERMIT
Description:	Failure to comply with the requirements listed in an applicable state permit.
	Specifically, on April 3, 2019 Invista loaded crude cresol into a tank trailer that
	had an expired Department of Transportation (DOT) leak tight check and annual DOT Certification.
Self Report?	NO Classification: Moderate
Citation:	1904 ST&C 1A OP
	30 TAC Chapter 116, SubChapter B 116.115(c)
	30 TAC Chapter 122, SubChapter B 122.143(4) 40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.169(c)(1)
	5C THSC Chapter 382 382.085(b)
Description:	Failure to comply with the requirements listed in an applicable state permit.
	Specifically, Invista failed to repair a pump within the fifteen-day regulatory timeframe. The pump was found leaking on April 11, 2019 but was not placed on
	Delay of Repair until June 10, 2019.
Self Report?	NO Classification: Moderate
Citation:	1904 ST&C 28 OP
	30 TAC Chapter 116, SubChapter B 116.115(c) 30 TAC Chapter 122, SubChapter B 122.143(4)
	40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.167(a)(2)
	5C THSC Chapter 382 382.085(b)
Description:	7186, SC 21F PERMIT Failure to equip each open-ended line (OEL) with a cap, blind flange, plug, or
Description.	second valve to seal the line. Specifically, Invista discovered thirty-four (34) open
	ended lines from April 1, 2019 through March 31, 2020.
Self Report? Citation:	NO Classification: Moderate
Citation:	1904 ST&C 1A OP 30 TAC Chapter 111, SubChapter A 111.111(a)(4)(A)(ii)
	30 TAC Chapter 122, SubChapter B 122.143(4)
Descriptions	5C THSC Chapter 382 382.085(b)
Description:	Failure to perform visible emissions observations. Specifically, Invista failed to perform visible emissions observations five (5) times from May 22, 2019 through
	June 3, 2019 for the Butadiene Flare and the Cold NH3 Flare.
Self Report?	NO Classification: Moderate
Citation:	1904 ST&C 1 OP 30 TAC Chapter 116, SubChapter B 116.115(c)
	30 TAC Chapter 122, SubChapter B 122.143(4)
	40 CFR Part 63, Subpart H 63.166
	5C THSC Chapter 382 382.085(b) 7186, SC 1 PERMIT
Description:	Failure to send purged liquids from a sample station to a closed-purge,
2 000. iptioni	closed-loop, or closed-vent system. Specifically, Invista's ADN column tails
	sample station drain was plugged which sent purged liquids from the ADN column
Self Report?	tail sample station to their slab and open trench areas. NO Classification: Moderate
Citation:	1904 ST&C 28 OP
	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)
	7186, SC 1 PERMIT
Description:	Failure to comply with the requirements listed in an applicable state permit.
	Specifically, Invista exceeded the 12-month rolling throughput from April 1, 2019
Self Report?	through September 30, 2019 for the PN Seal Flush Tank. NO Classification: Moderate
Citation:	1904 ST&C 28 OP
	30 TAC Chapter 101, SubChapter F 101.201
	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)
	7186, SC 1 PERMIT

Page 10

Description:	Failure to notify the TCEQ Corpus Chris event within 24 hours after the discove event, Texas Commission on Environm Environmental Electronic Reporting Sys discovered on November 22, 2019 at 0 event to the TCEQ Region Office on No four days after the 24-hour deadli	ery of the event. Speci ental Quality (TCEQ)/ stem (STEERS) Incide 542 hours; however,	fically, an emissions State of Texas nt No. 325563, was Invista reported the
	/28/2020 (1624119)		
Self Report? Citation:	NO 30 TAC Chapter 101, SubChapter A 10 30 TAC Chapter 116, SubChapter B 11 30 TAC Chapter 122, SubChapter B 12 5C THSC Chapter 382 382.085(b) PSDTX 1448, SC 8(E) PERMIT ST&C 16 OP	6.115(c)	Moderate
Description:	Failure to equip each open-ended valve cap, blind flange, plug, or a second val		appropriately sized
Self Report? Citation:	NO 30 TAC Chapter 101, SubChapter A 10 30 TAC Chapter 116, SubChapter B 11 30 TAC Chapter 122, SubChapter B 12 5C THSC Chapter 382 382.085(b) PSDTX 1448, SC 16 PERMIT ST&C 16 OP	Classification: 1.20(3) 6.115(c)	Moderate
Description:	Failure to maintain valid data of differe Filter baghouse for at least 95 percent over the previous rolling 12-month per	of the time that the b	
Self Report?	NO	Classification:	Moderate
Citation:	30 TAC Chapter 101, SubChapter A 10 30 TAC Chapter 116, SubChapter B 11 30 TAC Chapter 122, SubChapter B 12 5C THSC Chapter 382 382.085(b) PSDTX 1448, SC 8(F) PERMIT ST&C 16 OP	6.115(c)	
Description: Self Report?	Failure to re-monitor the replacement the being placed back into volatile organic NO		
Citation:	30 TAC Chapter 122, SubChapter B 12 5C THSC Chapter 382 382.058(b) ST&C 15 OP		Hoderate
Description: Self Report?	Failure to conduct visible emissions obs	servations once per ca Classification:	lendar quarter. Moderate
Citation:	30 TAC Chapter 101, SubChapter F 10: 30 TAC Chapter 122, SubChapter B 12 5C THSC Chapter 382 382.085(b) ST&C 2(F) OP	1.201(b)	Moderate
Description:	Failure to create complete final records emissions events as soon as practicabl of the emissions events.		
Self Report?	NO	Classification:	Moderate
Citation:	30 TAC Chapter 101, SubChapter A 10 30 TAC Chapter 116, SubChapter B 11 30 TAC Chapter 116, SubChapter B 11 30 TAC Chapter 122, SubChapter B 12 5C THSC Chapter 382 382.085(b) PSDTX 1448, GC 14 PA PSDTX 1448, GC 8 PERMIT PSDTX 1448, SC 1 PERMIT ST&C 16 OP	6.115(b)(2)(F) 6.115(c)	
Description:	Failure to prevent unauthorized emission non-reportable (recordable) emissions		e during
Self Report? Citation:	NO 30 TAC Chapter 122, SubChapter B 12 30 TAC Chapter 122, SubChapter B 12 5C THSC Chapter 382 382.085(b)	Classification: 2.143(4)	Moderate
Description:	GT&C OP Failure to report all instances of deviat	ions.	
Date: 09/ Self Report?	/30/2020 (1693256) 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

## F. Environmental audits:

Notice of Intent Date: 07/21/2017 (1429814) No DOV Associated

Notice of Intent Date: 10/24/2018 (1526495)

Disclosure Date: 01/29/2019

Viol. Classification: Moderate

Citation: 40 CFR Chapter 63, SubChapter C, PT 63, SubPT EEE 63.1211(c)(4)

Description: Failed to implement the new operating parameter limits included in the Notification of Compliance Status for Boilers 7 and 8 signed on May 22, 2018.

Viol. Classification: Moderate

Citation: 30 TAC Chapter 122, SubChapter B 122.146(4)

Description: Failed to report excess emissions of NOX from Boiler 7 during a period of Subpart D applicability on April 27 and 28, 2018. Specifically, the performance test for Boilers 7 and 8 performed under 40 CFR 60 Subpart D resulted in an emissions rate below 70% of the emission standard for oxides of nitrogen (NOx). As a result, Subpart D did not require the units to use continuous emissions monitoring systems for NOx. However, the units had NOx analyzers on the individual ducts.

Viol. Classification: Minor

Citation: 40 CFR Chapter 60, SubChapter C, PT 60, SubPT D 60.45(e)

Description: Failed to use the required method to convert NOx concentration data to units of the standard using the F-factor for the appropriate fuel consumed. Specifically, the conversion was performed using the correlation between combustion air flow and stack gas flow derived from the Hazardous Waste Combustion MACT (MACT EEE) performance test, which did not conform to the method required by the regulation (NSPS D).

Viol. Classification: Moderate

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

- Rqmt Prov: PERMIT SC No. 13.A.
- Description: Failed to maintain required monitored emission rate data stored in units of pounds per hour on a 30-day rolling average basis for the West Power House. Specifically, this data was not readily available. Viol. Classification: Moderate

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

Rgmt Prov: PERMIT SC No. 18.A.

PERMIT SC No. 5.A.

PERMIT SC No. 5.B.

PERMIT SC No. 6

- Description: Failed to generate and maintain 24-hour and 30-day rolling average emissions data for the Cogen unit. Specifically, this data was not readily available after February 2017.
- Viol. Classification: Moderate
- Citation: 40 CFR Chapter 75, SubChapter C, PT 75, SubPT H 75.70(a)(2)
- Description: Failed to perform sampling for methane or gross calorific value required by the referenced section of 40 CFR Part 75 Appendix D. Natural gas sampling was performed as required by 40 CFR 60 Subpart GG to demonstrate compliance with the sulfur standard.
- Viol. Classification: Moderate

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

- Rqmt Prov: PERMIT SC No. 10.E.
- Description: Failed to maintain records of tank throughput for the previous month and the past 12 consecutive months for August and September 2018.

Viol. Classification: Moderate

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

- Rqmt Prov: PERMIT SC No. 41
- Description: Failed to review the control efficiency calculations of the VNOx system. Specifically, the Special Condition No. 41 of Permit No. 810 requires the VNOx system to operate at an overall N2O control efficiency of 95% for Adipic Acid unit off gas (there are no monitoring requirements or operating parameter limits specified in the permit to assure 95% control efficiency). The efficiency appeared to be calculated in the site monitoring system but this data was not routinely reviewed.

Notice of Intent Date: 05/10/2019 (1569892) Disclosure Date: 10/09/2019 Viol. Classification: Minor

Citation: 30 TAC Chapter 101, SubChapter A 101.20(2)

30 TAC Chapter 116, SubChapter B 116.115(c)

40 CFR Chapter 61, SubChapter C, PT 61, SubPT FF 61.349(a)(1)(i)

Rqmt Prov: PERMIT Special Condition No. 16.F

- Description: Failed to monitor accessible valves by leak-checking for fugitive emissions at least quarterly using and approved gas analyzer. Specifically, 53 light liquid/gas vapor normal to monitor valves were not previously included in the LDAR program.
- Viol. Classification: Minor

Citation: 30 TAC Chapter 101, SubChapter A 101.20(2)

40 CFR Chapter 61, SubChapter C, PT 61, SubPT FF 61.349(a)(1)(i)

Description: Failed to design and operate the closed vent system with no detectable emissions. Specifically, 82 connectors were not previously included in the LDAR program.

Notice of Intent Date: 09/12/2019 (1597949)

Disclosure Date: 10/18/2019

Viol. Classification: Moderate

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

Rqmt Prov: PERMIT Special Condition No. 1

- Description: Failed to maintain Natural Gas (NG) supplemental fuel flow rates for the Cold NH3 Flare (EPN 10FLR004A) at rates used to calculate the MAER. Specifically, the NG flow was determined to be 6500 scfh which is greater than the NG flow for NH3 Secondary Condenser Purge (normal operations) and for 11 MSS activities.
- Notice of Intent Date: 10/23/2019 (1609957) No DOV Associated
- Notice of Intent Date: 04/28/2020 (1645995) No DOV Associated
- Notice of Intent Date:
   09/03/2020 (1672623)

   Disclosure Date:
   10/27/2020
- Viol. Classification: Moderate
- Citation: 30 TAC Chapter 334, SubChapter N 334.602(a)
- Description: Failed to perform or properly document Class C Operator training. Viol. Classification: Minor
- Citation: 30 TAC Chapter 334, SubChapter C 334.42(i)

Description: Failed to document spill containment inspections of sumps and manways.

Viol. Classification: Moderate

- Citation: 30 TAC Chapter 334, SubChapter C 334.50(d)(9) 30 TAC Chapter 334, SubChapter C 334.50(d)(9)(A)
  - 30 TAC Chapter 334, SubChapter C 334.50(d)(9)(A)(i)
  - 30 TAC Chapter 334, SubChapter C 334.50(d)(9)(A)(iii)

Description: Failed to reconcile tank daily inventory and throughput monthly for CY2020.

- Viol. Classification: Moderate
- Citation: 30 TAC Chapter 334, SubChapter N 334.602(a)(4)

Description: Failed to post safety and emergency contact information signage at fuel dispensers.

Notice of Intent Date: 12/15/2020 (1698245) No DOV Associated

Notice of Intent Date: 04/14/2021 (1710203) 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:  $_{N/A} \label{eq:N/A}$
- J. Early compliance:

N/A

Sites Outside of Texas:

N/A

## **Component Appendices**

## Appendix A All NOVs Issued During Component Period 5/12/2016 and 5/12/2021

1	Date:	06/3	22/2016	(1329329)			
						Classification:	Minor
	Self Repo	ort?	NO	For Informa	tional	Purposes	Only
	Citation:		30 TAC C	napter 290, SubChapt	er D 290.4	l6(m)	~
	Descriptio	on:		maintain the good wor		ition and general	appearance of the
			system's	facilities and equipme	nt.		
2	Date:	06/3	30/2016	(1359128)			
						Classification:	Moderate
	Self Repo	ort?	YES	For Informa	tional	Purposes	Only
	Citation:			Chapter 26, SubChapte			
	Doccrinti			hapter 305, SubChapt			<b>-</b>
	Descriptio	511.	Failure to	meet the limit for one		berniit parameter	
3	Date:	07/3	20/2016	(1349141)			
					-	Classification:	Moderate
	Self Repo	ort?	NO	For Informa	tional	Purposes	Only
	Citation:			hapter 101, SubChapt			
				hapter 116, SubChapt Chapter 382 382.085(		.15(c)	
			SC 7B PE		(5)		
	Descriptio	on:		maintain CEMS data t			ibration drift did not
			exceed th	o times the performa	nce specifi	Classification:	Moderate
	Self Repo	nrt?	NO	For Informa	tional	Purposes	Only
	Citation:			napter 101, SubChapt			0)
			40 CFR C	napter 60, SubChapte	r C, PT 60,		(a)(2)
	Descriptio			Chapter 382 382.085( complete a required r		sible omissions o	bearvation
	Description	511.	i anure to	complete a required i	nontriny vis		
						Classification:	Moderate
	Self Repo	ort?	NO	For Informa	tional	Purposes	Only
	Citation:		30 TAC C	napter 101, SubChapt			
				hapter 116, SubChapt		.15(c)	
			SC 12B P	Chapter 382 382.085( ERMIT	<b>D</b> )		
	Descriptio	on:	Failure to	record the HCL Tank	scrubber fl	low rate.	
						Classification:	Moderate
	Self Repo	ort?	NO	For Informa	tional	Purposes	Only
	Citation:			hapter 101, SubChapt			
				1apter 116, SubChapt Chapter 382 382.085(		.15(C)	
			SC 11F P	RMIT			
	Descriptio	on:	Failure to	monitor two valves.		Classification:	Moderate
			NO	For Informa	tional		
	Self Repo Citation:	ort?		For Informa			Only
	Citation.			napter 101, SubChapt napter 63, SubChapte			.217(a)(5)(i)
			5C THSC	Chapter 382 382.085(			
	Descriptio	n.	SC 5C PE Failure to	Comply with CO emis	sions limit		
	20001000			comply man co cimb		Classification:	Moderate
	Self Repo	ort?	NO	For Informa	tional	Purposes	Only
	Citation:			napter 101, SubChapt	er A 101.2	20(1)	<i>I</i>
				hapter 116, SubChapt		.15(c)	
			SC THSC	Chapter 382 382.085( RMIT	U)		
	Descriptio	on:		maintain minimum na	atural gas	flow.	

Date: 0	8/03/2016	(1349369)			
24(0)	5,00,2010	(10,000)	(	Classification:	Moderate
Self Report? Citation:	30 TAC ( 30 TAC ( 40 CFR (	Chapter 305, SubC Chapter 331, SubC Chapter 146, SubC	hapter D 331.64( hapter D, PT 146,	g)(1) , SubPT G 146	.68(c)(2)
		Chapter 146, SubC perating Parameter		, SUDPT G 140	.68(C)(3)
Description:		onitoring and Testi perform corrosion			
Date: 08	8/05/2016	(1349366)			
				Classification:	Moderate
Self Report?			national P		Only
Citation:	30 TAC ( 40 CFR ( VIII.A M	Chapter 305, SubC Chapter 331, SubC Chapter 146, SubC onitoring & Testing	hapter D 331.64( hapter D, PT 146, Requirements PE	d) , SubPT G 146 ERMIT	
Description:	continuo rates, in	ous recording devic	es to record inject ratures, injection	tion tubing pre volumes, tubi	ndition at all times, essures, injection flow ng-long string casing d by the permit.
Date: 08	8/23/2016	(1338121)			
				Classification:	Minor
Self Report?			national P		Only
Citation:		Chapter 305, SubC Limits & Mon. RQM			
Description:		maintain compliar	nce with the perm	itted effluent l	
				Classification:	Moderate
Self Report?			national P		Uniy
Citation:		Chapter 305, SubC Limits & Mon. RQM			
Description:		prevent the unaut	horized discharge	e of floating so	
0 K D 10		For Infor	national P	Classification:	Moderate
Self Report? Citation:		Chapter 305, SubC			Only
Description:	Effluent Failed to	Limits & Mon. RQM ensure the discha aters, water treatm	ITs; Pg. 2 PERMIT rge of only non-co	ontact cooling	
	previous	ly monitored efflue ater, and treated gi	ents (process area		
Date: 08	8/26/2016	(1349177)			
				Classification:	
Self Report?			national P		Only
Citation:	30 TAC ( 30 TAC ( 5C THSC	Chapter 101, SubC Chapter 116, SubC Chapter 122, SubC C Chapter 382 382. O-1904, STC 24 C	hapter B 116.115 hapter B 122.143 085(b)	(c)	
	NSR No.	7186, SC 20 PERM	1IT		
Description:		o conduct VOC mo	nitoring.	ol :::	M. 1
0 K D 10		For Infor		Classification:	Moderate
Self Report? Citation:		Chapter 111, SubC	national P		Only
citation	30 TAC ( 5C THSC	Chapter 122, SubC Chapter 382 382. O-1904, STC 3 OP	hapter B 122.143 085(b)		
Description:	Failure t	o conduct an obser quarter.	vation of a station	nary vent at le Classification:	ast once during a Moderate
Solf Donot		For Infor	national P		
Self Report? Citation:		Chapter 111, SubC			<b>U</b> III y
	JUTAC				

	30 TAC Chapter 122, SubChapter B 122.143(4) 5C THSC Chapter 382 382.085(b)
Description:	FOP No. O-1904, STC 1 OP Failure to conduct visible emission monitoring. Classification: Minor
Solf Poport?	No For Informational Purposes Only
Self Report? Citation:	30 TAC Chapter 101, SubChapter A 101.20(3)
0.0000	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 No. O-1904, STC 24 OP
Description:	NSR No. 7186, SC 17 PERMIT Failure to prevent fugitive emissions from Open Ended Lines (OEL).
Description.	Classification: Moderate
Self Report?	NO For Informational Purposes Only
Citation:	30 TAC Chapter 101, SubChapter A 101.20(3) 30 TAC Chapter 116, SubChapter B 116.115(c)
	30 TAC Chapter 122, SubChapter B 122.143(4)
	40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.168(d)(2) 40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.174(b)(3)(i)
	5C THSC Chapter 382 382.085(b)
	FOP No. O-1904, STC 1A OP FOP No. O-1904, STC 24 OP
	NSR No. 7186, SC 17 PERMIT
Description:	Failure to monitor valves and connectors for fugitive emissions.
Date: 08/	30/2016 (1349175)
	Classification: Moderate
Self Report?	NO For Informational Purposes Only
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 No. O-1415 STC 17 OP NSR No. 810, SC1 PERMIT
Description:	Failure to prevent the exceedance of the Maximum Allowable Emission Rates. Classification: Moderate
Self Report?	No For Informational Purposes Only
Citation:	30 TAC Chapter 116, SubChapter B 116.116
	30 TAC Chapter 122, SubChapter B 122.143(4)
	5C THSC Chapter 382 382.085(b) FOP No. O-1415, SC 17 OP
Description:	Failure to comply with the representations and conditions of FOP No. O-1415. Classification: Moderate
Solf Doport?	NO For Informational Purposes Only
Self Report? Citation:	30 TAC Chapter 116, SubChapter B 116.116(c)
0.0000	30 TAC Chapter 122, SubChapter B 122.143(4)
	5C THSC Chapter 382 382.085(b) FOP No. O-1415, STC 17 OP
	NSR No. 810, SC13 PERMIT
Description:	Failure to conduct visible emission observations. Classification: Moderate
Self Report?	No For Informational Purposes Only
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 No. O-1415, STC 17 OP
	NSR No. 20011, SC 8 PERMIT
Description:	Failure to conduct audio, olfactory, and visual checks (AVO). Classification: Minor
Self Report?	NO For Informational Purposes Only
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 No. O-1415, STC 17 OP
	NSR No. 20011, SC 7E PERMIT
Description:	NSR No. 810, SC 7E PERMIT Failure to prevent fugitive emissions from Open Ended Lines (OEL).

Classification: Moderate For Informational Purposes Only Self Report? NO 30 TAC Chapter 106, SubChapter S 106.433(4)(B) Citation: 30 TAC Chapter 122, SubChapter B 122.143(4) 5C THSC Chapter 382 382.085(b) FOP No. O-1415, STC 18 OP Failure to prevent the exceedance of the Maximum Allowable Emission Rates. Description: Classification: Moderate Self Report? For Informational Purposes Only NO 30 TAC Chapter 122, SubChapter B 122.143(4) Citation: 30 TAC Chapter 122, SubChapter B 122.145(2)(B) 5C THSC Chapter 382 382.085(b) Failure to report all instances of a deviation. Description: Date: 08/31/2016 (1355247)Classification: Minor For Informational Purposes Only Self Report? NO Citation: 30 TAC Chapter 116, SubChapter B 116.116(a) 30 TAC Chapter 122, SubChapter B 122.143(4) 5C THSC Chapter 382 382.085(b) SC 1 PERMIT STC 17 OP Description: Failure to comply with the requirements listed in an applicable state permit. Classification: Minor For Informational Purposes Only Self Report? NO 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) GC 1 PERMIT STC 17 OP Description: Failure to comply with the requirements listed in an applicable state permit. Classification: Minor For Informational Purposes Only Self Report? NO 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) GC 5 PERMIT STC 17 OP Description: Failure to perform sampling for natural gas sulfur content. Classification: Minor For Informational Purposes Only Self Report? NO 30 TAC Chapter 116, SubChapter B 116.115(c) Citation: 30 TAC Chapter 122, SubChapter B 122.143(4) 5C THSC Chapter 382 382.085(b) GC 10 PERMIT STC 17 OP Description: Failure to perform monitoring on two connectors. Classification: Minor For Informational Purposes Unly NO Self Report? 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 63, SubChapter C, PT 63, SubPT H 63.167(a)(1) 5C THSC Chapter 382 382.085(b) GC 10 PERMIT STC 17 PERMIT Description: Failure to prevent fugitive emissions from Open Ended Lines (OEL). Classification: Minor For Informational Purposes Unly NO Self Report? 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) SC 1 PERMIT STC 17 PERMIT Description: Failure to comply with the requirements listed in an applicable state permit.

	Classification: Minor
Self Report?	NO For Informational Purposes Only
Citation:	30 TAC Chapter 111, SubChapter A 111.111(a)(8)(B)(i)
	30 TAC Chapter 122, SubChapter B 122.143(4) 5C THSC Chapter 382 382.085(b)
	STC 3B(ii) PERMIT
Description:	Failure to perform visible emissions evaluations.
	Classification: Minor
Self Report?	NO For Informational Purposes Only
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)
	SC 5 PERMIT
Description:	STC 17 PERMIT Failure to comply with the requirements listed in an applicable state permit.
2 000 ip 000	Classification: Minor
Self Report?	NO For Informational Purposes Only
Citation:	30 TAC Chapter 116, SubChapter B 116.115(c)
Citationi	30 TAC Chapter 122, SubChapter B 122.143(4)
	5C THSC Chapter 382 382.085(b) SC 1 PERMIT
	STC 17 OP
Description:	Failure to comply with the requirements listed in an applicable state permit.
	Classification: Minor
Self Report?	NO For Informational Purposes Only
Citation:	30 TAC Chapter 116, SubChapter B 116.115(b)(2)(F) 30 TAC Chapter 116, SubChapter B 116.116(a)
	30 TAC Chapter 122, SubChapter B 122.143(4)
	5C THSC Chapter 382 382.085(b) SC 1 PERMIT
	STC 17 OP
Description:	Failure to comply with the requirements listed in an applicable state permit. Classification: Minor
Self Report?	NO For Informational Purposes Only
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) SC 17B PERMIT
	STC 17 OP
Description:	Failure to conduct audio, olfactory, and visual checks (AVO). Classification: Minor
Colf Doport?	For Informational Durpages Only
Self Report? Citation:	NO FOR INFORMATIONAL PURPOSES ONLY 30 TAC Chapter 116, SubChapter B 116.115(c)
Citation	30 TAC Chapter 122, SubChapter B 122.143(4)
	5C THSC Chapter 382 382.085(b)
	SC 8C PERMIT STC 17 OP
Description:	Failure to comply with the requirements listed in an applicable state permit.
	Classification: Minor
Self Report?	NO For Informational Purposes Only
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)
	SC 1 PERMIT
Description:	STC 17 OP Failure to comply with the requirements listed in an applicable state permit.
Date: 09/	30/2016 (1357771)
	Classification: Moderate
Self Report?	NO For Informational Purposes Only
Citation:	30 TAC Chapter 101, SubChapter A 101.20(3) 30 TAC Chapter 116, SubChapter B 116.115(c)
	30 TAC Chapter 112, SubChapter B 122.143(4)
	5C THSC Chapter 382 382.085(b)
	NSR 7186b & PSDTX1079M1 (SC) (1) PERMIT

Description: Failure to prevent unauthorized emissions to the atmosphere during an emission event, Incident No. 240550 that occurred on August 1, 2016.

11	Date:	11/	29/2016	(1370328)			
						Classification:	Moderate
	Self Repo Citation:	rt?	30 TAC C	hapter 101, SubCh hapter 116, SubCh Chapter 382 382.0 MIT	apter A 101.2 apter B 116.1		Dnly
	Descriptio	on:	Failure to event tha 236240. (VOC), 79 of ammo	prevent unauthor toccurred on June Specifically, Invista 96.61 lbs. of carbo nia to the atmosph	23, 2016 thre released 10, n monoxide, 1 ere and excee	ough June 26, 201 791 lbs. of volatile	e during an emissions 6, TCEQ Incident No. organic compounds en oxides, 38.28 lbs. it by 36 percent perator error.
12	Date:	12/	16/2016	(1357800)		Classification:	Moderate
	0 K D			For Inform	antional		
	Self Repo Citation:		30 TAC C 5C THSC Federal C	hapter 101, SubCh hapter 122, SubCh Chapter 382 382.0 perating Permit No	apter F 101.2 apter B 122.1 )85(b) o. O-1415 OP	.43(4)	,
	Descriptio	on:	event wit event, Te Environm discovere the event	hin 24 hours after exas Commission of ental Electronic Re d on May 15, 2014 t to the TCEQ Regio	the discovery n Environment porting Syste at 04:08 hou on Office on Ju	of the event. Spec tal Quality (TCEQ)/ m (STEERS) Incide ırs; however, INVI	eportable emission ifically, an emission State of Texas ent No. 199758, was STA SARL reported :19 hours which was
			28 days a	after the 24-hour d	eadline.	Classification:	Moderate
	Colf Dono	<b>⊷</b> +⊃	NO	For Inform	national	Purposes (	John
	Self Repo Citation:	rt?	30 TAC C	hapter 116, SubCh Chapter 382 382.0	apter B 116.1		Jiliy
	Descriptio	on:	Failure to event tha Specifical 99.93 pot 42 minute	prevent unauthor at was discovered of lly, INVISTA SARL unds of benzene fro es. The OLA does r affirmative defens	ized emissions on May 15, 20 released unau om the outlyir not have a spe	14, TCEQ/STEERS thorized emissions	event lasted 1 hour, The event did not
13	Date:	01/	16/2017	(1370561)		Classification:	Moderate
		-+-2	NO	For Inform	national	Purposes (	
	Self Repo	rt?	NO 30 TAC C	hapter 101, SubCh			Энту
			5C THSC	Chapter 382 382.0	)85(b)		
	Descriptio	on:		notify the TCEQ C notify the TCEQ C notify the ter			reportable emissions Moderate
	Self Repo	rt?	NO	For Inform	national	Purposes (	Dnly
	Citation:		30 TAC C	hapter 111, SubCh hapter 116, SubCh Chapter 382 382.0 MIT	apter B 116.1		
	Descriptio	n:		aged over a six-mi	nute period fr	om the West Power Classification:	n a limit of 20 percent r Houses Boiler No. 1. Moderate
	Self Repo	rt?	NO	For Inform	national	Purposes (	Dnly
	Citation:			hapter 101, SubCh Chapter 382 382.0		01(c)	
	Descriptio	n:	Failure to	submit a copy of t	the final record	d to the applicable maintenance activ Classification:	commission office no ity. Moderate

Self Report? Citation:	NO For Informational Purposes Only 30 TAC Chapter 111, SubChapter A 111.111(a)(1)(B) 30 TAC Chapter 116, SubChapter B 116.115(c) 5C THSC Chapter 382 382.085(b)
Description:	SC 3 PERMIT Failure to prevent visible emissions with opacity greater than a limit of 20 percent (%) averaged over a six-minute period from the East Power Houses Boiler No. 7. Classification: Moderate
Self Report? Citation:	NO For Informational Purposes Only 30 TAC Chapter 101, SubChapter F 101.201(a)(1) 5C THSC Chapter 382 382.085(b)
Description:	Failure to notify the TCEQ Corpus Christi Region Office of a reportable emissions event within 24 hours after the discovery of the event. Classification: Moderate
Self Report?	NO For Informational Purposes Only
Citation:	30 TAC Chapter 116, SubChapter B 116.115(b) 30 TAC Chapter 116, SubChapter B 116.115(c) 5C THSC Chapter 382 382.085(b) GC 8 PERMIT SC 1 PERMIT
Description:	Failure to prevent unauthorized emissions to the atmosphere during an emissions event that was discovered on November 9, 2014, TCEQ/STEERS Incident No. 206288.
Date: 01/	/20/2017 (1370039)
	Classification: Moderate
Self Report?	NO For Informational Purposes Only
Citation:	30 TAC Chapter 305, SubChapter F 305.125 30 TAC Chapter 335, SubChapter H 335.221(a)(6) 40 CFR Chapter 266, SubChapter I, PT 266, SubPT H 266.102(e)(8)(iii) PP.II.A. Duty to Comply PERMIT
Description:	PP.III.D. General Inspection Requirement PERMIT Failed to follow the inspection schedule contained in the permit application submittals identified in Provision I.B, and as set out in Table III.D Inspection Schedule.
Date: 02/	/28/2017 (1411128)
	Classification: Moderate
Self Report?	YES For Informational Purposes Only
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
	/14/2017 (1357499)
	Classification: Minor
Self Report?	NO For Informational Purposes Only
Citation:	30 TAC Chapter 101, SubChapter F 101.201(a)(1) 30 TAC Chapter 122, SubChapter B 122.143(4) 5C THSC Chapter 382 382.085(b) GTC OP STC 2F OP
Description:	Failure to notify the TCEQ Corpus Christi Office of a reportable event within 24 hours after the discovery. Specifically, Invista Sarl failed to submit in a timely manner two initial notifications for two reportable events (TCEQ/STEERS Incident Nos. 214165 and 229122). Classification: Moderate
Self Report?	NO For Informational Purposes Only
Citation:	30 TAC Chapter 101, SubChapter A 101.20(3) 30 TAC Chapter 116, SubChapter B 116.115(b)(2)(F) 30 TAC Chapter 122, SubChapter B 122.143(4) 5C THSC Chapter 382 382.085(b)
	SC 1 PA STC 15 OP
Description:	Failure to prevent unauthorized emissions to the atmosphere during a reportable emissions event, Incident 214165 that occurred on 05/09/15 at 15:17 hrs.

	Specifically, Invista Sarl released from the OP-1-Low Pressure Scrubber Vent (EPN 06VNT-001) and OP-1 High Pressure Scrubber Vent (EPN 06VNT-002) the following contaminants and total amounts: 18,102 lbs of cyclohexene and 3.44 lbs of benzene. The event occurred for duration of 127 hrs, 48 mins. The event did not meet the affirmative defense.
Self Report?	NO For Informational Purposes Only
Citation:	30 TAC Chapter 111, SubChapter A 111.111(a)(1)(B) 30 TAC Chapter 116, SubChapter B 116.115(b) 30 TAC Chapter 122, SubChapter B 122.143(4) 5C THSC Chapter 382 382.085(b) SC 3 PERMIT STC 15 OP STC 3 OP
Description:	Failure to prevent visible emissions with opacity greater than 20% averaged over a six-minute period. Specifically, Invista Sarl released 41.52% opacity from the West Power House Stack for Boilers 1 & 2 (EPN 15STK-005) during an event, Incident No. 229122, which was discovered on 03/12/16 at 00:24 hours for duration of 6 mins. The event was due to operator error, and notification for this event was not submitted to the TCEQ in a timely manner. This event does not meet the affirmative defense.
	Classification: Moderate
Self Report?	NO For Informational Purposes Only
Citation:	[7186/PSD-TX-1079M1] SC 1 PA 30 TAC Chapter 101, SubChapter A 101.20(3)
	30 TAC Chapter 116, SubChapter B 116.115(b)
	30 TAC Chapter 122, SubChapter B 122.143(4) 5C THSC Chapter 382 382.085(b)
Decerintian	STC 15 OP
Description:	Failure to prevent unauthorized emissions to the atmosphere during a reportable emissions event, TCEQ/STEERS Incident No. 232412, which was discovered on
	April 28, 2016 at 13:18 hours. Specifically, Invista Sarl released 25.33 lbs of
	hydrogen cyanide, 196.89 lbs of ammonia, 513.15 lbs of carbon monoxide, 62.07 lbs of nitrogen oxides, 0.8 lbs of sulfur dioxide, 3.9 lbs of unspeciated VOC from
	the ADN Facility (EPNs 10FLR002, 10FLR004, 10FLR001, 10FLR005, 10FLR003A,
	and 10FLR003). The event occu
	Classification' Moderate
Solf Doport?	Classification: Moderate
Self Report?	NO For Informational Purposes Only
Self Report? Citation:	NO For Informational Purposes Only [7186/PSD-TX-1079M1] SC 1 PA 30 TAC Chapter 101, SubChapter A 101.20(3)
	NO For Informational Purposes Only [7186/PSD-TX-1079M1] SC 1 PA 30 TAC Chapter 101, SubChapter A 101.20(3) 30 TAC Chapter 116, SubChapter B 116.115(b)
	NO For Informational Purposes Only [7186/PSD-TX-1079M1] SC 1 PA 30 TAC Chapter 101, SubChapter A 101.20(3)
	NO For Informational Purposes Only [7186/PSD-TX-1079M1] SC 1 PA 30 TAC Chapter 101, SubChapter A 101.20(3) 30 TAC Chapter 116, SubChapter B 116.115(b) 30 TAC Chapter 122, SubChapter B 122.143(4) 5C THSC Chapter 382 382.085(b) GTC OP
Citation:	NO For Informational Purposes Only [7186/PSD-TX-1079M1] SC 1 PA 30 TAC Chapter 101, SubChapter A 101.20(3) 30 TAC Chapter 116, SubChapter B 116.115(b) 30 TAC Chapter 122, SubChapter B 122.143(4) 5C THSC Chapter 382 382.085(b) GTC OP STC 15 OP
	NO For Informational Purposes Only [7186/PSD-TX-1079M1] SC 1 PA 30 TAC Chapter 101, SubChapter A 101.20(3) 30 TAC Chapter 116, SubChapter B 116.115(b) 30 TAC Chapter 122, SubChapter B 122.143(4) 5C THSC Chapter 382 382.085(b) GTC OP STC 15 OP Failure to prevent unauthorized emissions to the atmosphere during a reportable emissions event, Incident No. 235220, which was discovered on 06/08/16 at 10:58 hours. Specifically, Invista Sarl released 1,491.48 lbs of ammonia and 4.57 lbs of unspeciated VOC from EPN 10FLR-004. The event occurred for duration of 47 minutes. The unauthorized emissions were not beyond the control of the owner/operator, and could have been avoided, and therefore, does not
Citation:	NO For Informational Purposes Only [7186/PSD-TX-1079M1] SC 1 PA 30 TAC Chapter 101, SubChapter A 101.20(3) 30 TAC Chapter 116, SubChapter B 116.115(b) 30 TAC Chapter 122, SubChapter B 122.143(4) 5C THSC Chapter 382 382.085(b) GTC OP STC 15 OP Failure to prevent unauthorized emissions to the atmosphere during a reportable emissions event, Incident No. 235220, which was discovered on 06/08/16 at 10:58 hours. Specifically, Invista Sarl released 1,491.48 lbs of ammonia and 4.57 lbs of unspeciated VOC from EPN 10FLR-004. The event occurred for duration of 47 minutes. The unauthorized emissions were not beyond the control of the owner/operator, and could have been avoided, and therefore, does not meet the affirmative defense.
Citation: Description:	NO For Informational Purposes Only [7186/PSD-TX-1079M1] SC 1 PA 30 TAC Chapter 101, SubChapter A 101.20(3) 30 TAC Chapter 116, SubChapter B 116.115(b) 30 TAC Chapter 122, SubChapter B 122.143(4) 5C THSC Chapter 382 382.085(b) GTC OP STC 15 OP Failure to prevent unauthorized emissions to the atmosphere during a reportable emissions event, Incident No. 235220, which was discovered on 06/08/16 at 10:58 hours. Specifically, Invista Sarl released 1,491.48 lbs of ammonia and 4.57 lbs of unspeciated VOC from EPN 10FLR-004. The event occurred for duration of 47 minutes. The unauthorized emissions were not beyond the control of the owner/operator, and could have been avoided, and therefore, does not meet the affirmative defense. Classification: Moderate
Citation: Description: Self Report?	NO For Informational Purposes Only [7186/PSD-TX-1079M1] SC 1 PA 30 TAC Chapter 101, SubChapter A 101.20(3) 30 TAC Chapter 116, SubChapter B 116.115(b) 30 TAC Chapter 122, SubChapter B 122.143(4) 5C THSC Chapter 382 382.085(b) GTC OP STC 15 OP Failure to prevent unauthorized emissions to the atmosphere during a reportable emissions event, Incident No. 235220, which was discovered on 06/08/16 at 10:58 hours. Specifically, Invista Sarl released 1,491.48 lbs of ammonia and 4.57 lbs of unspeciated VOC from EPN 10FLR-004. The event occurred for duration of 47 minutes. The unauthorized emissions were not beyond the control of the owner/operator, and could have been avoided, and therefore, does not nee the affirmative defense. Classification: Moderate NO FORINGENERIAL PURPOSED ONLY
Citation: Description:	NO For Informational Purposes Only [7186/PSD-TX-1079M1] SC 1 PA 30 TAC Chapter 101, SubChapter A 101.20(3) 30 TAC Chapter 116, SubChapter B 116.115(b) 30 TAC Chapter 122, SubChapter B 122.143(4) 5C THSC Chapter 382 382.085(b) GTC OP STC 15 OP Failure to prevent unauthorized emissions to the atmosphere during a reportable emissions event, Incident No. 235220, which was discovered on 06/08/16 at 10:58 hours. Specifically, Invista Sarl released 1,491.48 lbs of ammonia and 4.57 lbs of unspeciated VOC from EPN 10FLR-004. The event occurred for duration of 47 minutes. The unauthorized emissions were not beyond the control of the owner/operator, and could have been avoided, and therefore, does not meet the affirmative defense. NO For Informational Purposes Only 30 TAC Chapter 101, SubChapter A 101.20(3) 30 TAC Chapter 101, SubChapter A 101.20(3) 30 TAC Chapter 116, SubChapter B 116.115(b)
Citation: Description: Self Report?	NO For Informational Purposes Only [7186/PSD-TX-1079M1] SC 1 PA 30 TAC Chapter 101, SubChapter A 101.20(3) 30 TAC Chapter 116, SubChapter B 116.115(b) 30 TAC Chapter 122, SubChapter B 122.143(4) 5C THSC Chapter 382 382.085(b) GTC OP STC 15 OP Failure to prevent unauthorized emissions to the atmosphere during a reportable emissions event, Incident No. 235220, which was discovered on 06/08/16 at 10:58 hours. Specifically, Invista Sarl released 1,491.48 lbs of ammonia and 4.57 lbs of unspeciated VOC from EPN 10FLR-004. The event occurred for duration of 47 minutes. The unauthorized emissions were not beyond the control of the owner/operator, and could have been avoided, and therefore, does not meet the affirmative defense. NO For Informational Purposes Only 30 TAC Chapter 101, SubChapter A 101.20(3) 30 TAC Chapter 101, SubChapter A 101.20(3) 30 TAC Chapter 116, SubChapter B 116.115(b) 30 TAC Chapter 122, SubChapter B 122.143(4)
Citation: Description: Self Report?	NO For Informational Purposes Only [7186/PSD-TX-1079M1] SC 1 PA 30 TAC Chapter 101, SubChapter A 101.20(3) 30 TAC Chapter 116, SubChapter B 116.115(b) 30 TAC Chapter 122, SubChapter B 122.143(4) 5C THSC Chapter 382 382.085(b) GTC OP STC 15 OP Failure to prevent unauthorized emissions to the atmosphere during a reportable emissions event, Incident No. 235220, which was discovered on 06/08/16 at 10:58 hours. Specifically, Invista Sarl released 1,491.48 lbs of ammonia and 4.57 lbs of unspeciated VOC from EPN 10FLR-004. The event occurred for duration of 47 minutes. The unauthorized emissions were not beyond the control of the owner/operator, and could have been avoided, and therefore, does not meet the affirmative defense. NO For Informational Purposes Only 30 TAC Chapter 101, SubChapter A 101.20(3) 30 TAC Chapter 101, SubChapter A 101.20(3) 30 TAC Chapter 116, SubChapter B 116.115(b)
Citation: Description: Self Report?	NO For Informational Purposes Only [7186/PSD-TX-1079M1] SC 1 PA 30 TAC Chapter 101, SubChapter A 101.20(3) 30 TAC Chapter 116, SubChapter B 116.115(b) 30 TAC Chapter 122, SubChapter B 122.143(4) 5C THSC Chapter 382 382.085(b) GTC OP STC 15 OP Failure to prevent unauthorized emissions to the atmosphere during a reportable emissions event, Incident No. 235220, which was discovered on 06/08/16 at 10:58 hours. Specifically, Invista Sarl released 1,491.48 lbs of ammonia and 4.57 lbs of unspeciated VOC from EPN 10FLR-004. The event occurred for duration of 47 minutes. The unauthorized emissions were not beyond the control of the owner/operator, and could have been avoided, and therefore, does not meet the affirmative defense. NO For Informational Purposes Only 30 TAC Chapter 101, SubChapter A 101.20(3) 30 TAC Chapter 116, SubChapter B 116.115(b) 30 TAC Chapter 122, SubChapter B 122.143(4) 5C THSC Chapter 382 382.085(b) 7186 [PSD-TX-1079M1] SC7(B) PA
Citation: Description: Self Report?	NO For Informational Purposes Only [7186/PSD-TX-1079M1] SC 1 PA 30 TAC Chapter 101, SubChapter A 101.20(3) 30 TAC Chapter 116, SubChapter B 116.115(b) 30 TAC Chapter 122, SubChapter B 122.143(4) SC THSC Chapter 382 382.085(b) GTC OP STC 15 OP Failure to prevent unauthorized emissions to the atmosphere during a reportable emissions event, Incident No. 235220, which was discovered on 06/08/16 at 10:58 hours. Specifically, Invista Sarl released 1,491.48 lbs of ammonia and 4.57 lbs of unspeciated VOC from EPN 10FLR-004. The event occurred for duration of 47 minutes. The unauthorized emissions were not beyond the control of the owner/operator, and could have been avoided, and therefore, does not meet the affirmative defense. NO For Informational Purposes Only 30 TAC Chapter 101, SubChapter A 101.20(3) 30 TAC Chapter 116, SubChapter B 116.115(b) 30 TAC Chapter 122, SubChapter B 122.143(4) 5C THSC Chapter 382 382.085(b) 7186 [PSD-TX-1079M1] SC7(B) PA FOP 0-1867 GTC OP
Citation: Description: Self Report? Citation:	NO For Informational Purposes Only [7186/PSD-TX-1079M1] SC 1 PA 30 TAC Chapter 101, SubChapter A 101.20(3) 30 TAC Chapter 116, SubChapter B 116.115(b) 30 TAC Chapter 122, SubChapter B 122.143(4) 5C THSC Chapter 382 382.085(b) GTC OP STC 15 OP Failure to prevent unauthorized emissions to the atmosphere during a reportable emissions event, Incident No. 235220, which was discovered on 06/08/16 at 10:58 hours. Specifically, Invista Sarl released 1,491.48 lbs of ammonia and 4.57 lbs of unspeciated VOC from EPN 10FLR-004. The event occurred for duration of 47 minutes. The unauthorized emissions were not beyond the control of the owner/operator, and could have been avoided, and therefore, does not meet the affirmative defense. Classification: Moderate NO For Informational Purposes Only 30 TAC Chapter 101, SubChapter A 101.20(3) 30 TAC Chapter 116, SubChapter B 116.115(b) 30 TAC Chapter 122, SubChapter B 116.115(b) 30 TAC Chapter 122, SubChapter B 116.115(b) 30 TAC Chapter 1382 382.085(b) 7186 [PSD-TX-1079M1] SC7(B) PA FOP 0-1867 GTC OP FOP 0-1867 STC 15 OP
Citation: Description: Self Report?	NO For Informational Purposes Only [7186/PSD-TX-1079M1] SC 1 PA 30 TAC Chapter 101, SubChapter A 101.20(3) 30 TAC Chapter 116, SubChapter B 116.115(b) 30 TAC Chapter 122, SubChapter B 122.143(4) 5C THSC Chapter 382 382.085(b) GTC OP STC 15 OP Failure to prevent unauthorized emissions to the atmosphere during a reportable emissions event, Incident No. 235220, which was discovered on 06/08/16 at 10:58 hours. Specifically, Invista Sarl released 1,491.48 lbs of ammonia and 4.57 lbs of unspeciated VOC from EPN 10FLR-004. The event occurred for duration of 47 minutes. The unauthorized emissions were not beyond the control of the owner/operator, and could have been avoided, and therefore, does not meet the affirmative defense. Classification: Moderate NO For Informational Purposes Only 30 TAC Chapter 101, SubChapter A 101.20(3) 30 TAC Chapter 116, SubChapter B 116.115(b) 30 TAC Chapter 122, SubChapter B 122.143(4) 5C THSC Chapter 382 382.085(b) 7186 [PSD-TX-1079M1] SC7(B) PA FOP O-1867 GTC OP FOP O-1867 STC 15 OP Failure to operate the Ammonia Startup Flare with a flame present at all times and/or have a constant pilot flame. Specifically, on June 8, 2016, between 10:58
Citation: Description: Self Report? Citation:	NO         For Informational Purposes Only           [7186/PSD-TX-1079M1] SC 1 PA           30 TAC Chapter 101, SubChapter A 101.20(3)           30 TAC Chapter 116, SubChapter B 116.115(b)           30 TAC Chapter 122, SubChapter B 122.143(4)           SC THSC Chapter 382 382.085(b)           GTC OP           STI 15 OP           Failure to prevent unauthorized emissions to the atmosphere during a reportable emissions event, Incident No. 235220, which was discovered on 06/08/16 at 10:58 hours. Specifically, Invista Sarl released 1,491.48 lbs of ammonia and 4.57 lbs of unspeciated VOC from EPN 10FLR-004. The event occurred for duration of 47 minutes. The unauthorized emissions were not beyond the control of the owner/operator, and could have been avoided, and therefore, does not meet the affirmative defense.           NO         For Informational Purposes Only           30 TAC Chapter 101, SubChapter A 101.20(3)         30 TAC Chapter 116, SubChapter B 116.115(b)           30 TAC Chapter 116, SubChapter B 122.143(4)         5C THSC Chapter 382 382.085(b)           7186 [PSD-TX-1079M1] SC7(B) PA         FOP 0-1867 STC 15 OP           Failure to operate the Ammonia Startup Flare with a flame present at all times and/or have a constant pilot flame. Specifically, on June 8, 2016, between 10:58 hours and 11:45 hours, a build-up of water from the ammonia recycle/feed
Citation: Description: Self Report? Citation:	NO For Informational Purposes Only [7186/PSD-TX-1079M1] SC 1 PA 30 TAC Chapter 101, SubChapter A 101.20(3) 30 TAC Chapter 116, SubChapter B 116.115(b) 30 TAC Chapter 122, SubChapter B 122.143(4) 5C THSC Chapter 382 382.085(b) GTC OP STC 15 OP Failure to prevent unauthorized emissions to the atmosphere during a reportable emissions event, Incident No. 235220, which was discovered on 06/08/16 at 10:58 hours. Specifically, Invista Sarl released 1,491.48 lbs of ammonia and 4.57 lbs of unspeciated VOC from EPN 10FLR-004. The event occurred for duration of 47 minutes. The unauthorized emissions were not beyond the control of the owner/operator, and could have been avoided, and therefore, does not meet the affirmative defense. Classification: Moderate NO For Informational Purposes Only 30 TAC Chapter 101, SubChapter A 101.20(3) 30 TAC Chapter 116, SubChapter B 116.115(b) 30 TAC Chapter 122, SubChapter B 122.143(4) 5C THSC Chapter 382 382.085(b) 7186 [PSD-TX-1079M1] SC7(B) PA FOP O-1867 GTC OP FOP O-1867 STC 15 OP Failure to operate the Ammonia Startup Flare with a flame present at all times and/or have a constant pilot flame. Specifically, on June 8, 2016, between 10:58
Citation: Description: Self Report? Citation:	NO       For Informational Purposes Only         [7186/PSD-TX-1079M1] SC 1 PA         30 TAC Chapter 101, SubChapter A 101.20(3)         30 TAC Chapter 116, SubChapter B 116.115(b)         30 TAC Chapter 122, SubChapter B 112.143(4)         SC THSC Chapter 382 382.085(b)         GT OP         STC 15 OP         Failure to prevent unauthorized emissions to the atmosphere during a reportable emissions event, Incident No. 235220, which was discovered on 06/08/16 at 10:58 hours. Specifically, Invista Sarl released 1,491.48 lbs of ammonia and 4.57 lbs of unspeciated VOC from EPN 10FLR-004. The event occurred for duration of 47 minutes. The unauthorized emissions were not beyond the control of the owner/operator, and could have been avoided, and therefore, does not meet the affirmative defense.         NO       FORINFORMATIONAL PURPOSES ONLY         30 TAC Chapter 101, SubChapter A 101.20(3)       30 TAC Chapter 101, SubChapter B 116.115(b)         30 TAC Chapter 116, SubChapter B 116.115(b)       30 TAC Chapter 382 382.085(b)         7186 [PSD-TX-1079M1] SC7(B) PA         FOP 0-1867 GTC OP         FOP 0-1867 STC 15 OP         Failure to operate the Ammonia Startup Flare with a flame present at all times and/or have a constant pilot flame. Specifically, on June 8, 2016, between 10:58 hours and 11:45 hours, a build-up of water from the ammonia recycle/feed preparation system caused the Ammonia Startup Flare (EPN 10FLR-004) pilots to
Citation: Description: Self Report? Citation: Description:	<ul> <li>No For Informational Purposes Only</li> <li>[7186/PSD-TX-1079M1] SC 1 PA</li> <li>30 TAC Chapter 101, SubChapter A 101.20(3)</li> <li>30 TAC Chapter 116, SubChapter B 116.115(b)</li> <li>30 TAC Chapter 122, SubChapter B 122.143(4)</li> <li>5C THSC Chapter 382 382.085(b)</li> <li>GTOP</li> <li>Failure to prevent unauthorized emissions to the atmosphere during a reportable emissions event, Incident No. 235220, which was discovered on 06/08/16 at 10:58 hours. Specifically, Invista Sarl released 1,491.48 lbs of ammonia and 4.57 lbs of unspeciated VOC from EPN 10FLR-004. The event occurred for duration of 47 minutes. The unauthorized emissions were not beyond the control of the owner/operator, and could have been avoided, and therefore, does not meet the affirmative defense.</li> <li>C FOR Informational Purposes Only</li> <li>30 TAC Chapter 101, SubChapter A 101.20(3)</li> <li>30 TAC Chapter 116, SubChapter B 116.115(b)</li> <li>30 TAC Chapter 122, SubChapter B 122.143(4)</li> <li>5C THSC Chapter 382 382.085(b)</li> <li>7186 [PSD-TX-1079M1] SC7(B) PA FOP 0-1867 GTC OP FOP 0-1867 STC 15 OP</li> <li>Faliure to operate the Ammonia Startup Flare with a flame present at all times and/or have a constant pilot flame. Specifically, on June 8, 2016, between 10:58 hours and 11:45 hours, a build-up of water from the ammonia recycle/feed preparation system caused the Ammonia Startup Flare (EPN 10FLR-004) pilots to go out while ammonia and supplemental natural gas were being routed to the flare.</li> </ul>
Citation: Description: Self Report? Citation: Description:	NO       For Informational Purposes Only         [7186/PSD-TX-1079M1] SC 1 PA         30 TAC Chapter 101, SubChapter A 101.20(3)         30 TAC Chapter 116, SubChapter B 116.115(b)         30 TAC Chapter 122, SubChapter B 122.143(4)         SC THSC Chapter 382 382.085(b)         GTC OP         STC 15 OP         Failure to prevent unauthorized emissions to the atmosphere during a reportable emissions event, Incident No. 235220, which was discovered on 06/08/16 at 10:58 hours. Specifically, Invista Sarl released 1,491.48 lbs of ammonia and 4.57 lbs of unspeciated VOC from EPN 10FLR-004. The event occurred for duration of 47 minutes. The unauthorized emissions were not beyond the control of the owner/operator, and could have been avoided, and therefore, does not meet the affirmative defense.         NO       FORINFORMATIONAL PURPOSES ONLY         30 TAC Chapter 101, SubChapter A 101.20(3)       30 TAC Chapter 116, SubChapter B 116.115(b)         30 TAC Chapter 122, SubChapter B 112.143(4)       5C THSC Chapter 382 382.085(b)         7186 [PSD-TX-1079M1] SC7(B) PA         FOP O-1867 STC 15 OP         Failure to operate the Ammonia Startup Flare with a flame present at all times and/or have a constant pilot flame. Specifically, on June 8, 2016, between 10:58 hours and 11:45 hours, a build-up of water from the ammonia recycle/feed preparation system caused the Ammonia Startup Flare (EPN 10FLR-004) pilots to go out while ammonia and supplemental natural gas were being routed to the

	Self Repo	rt? NO	For Infor	mational Pu	poses Onl	V
	Citation:	30 TAC C 30 TAC C 40 CFR C 40 CFR C	Chapter 305, Sub Chapter 331, Sub Chapter 146, Sub Chapter 146, Sub	Chapter F 305.125 Chapter D 331.64(g)( Chapter D, PT 146, S Chapter D, PT 146, S	1) JbPT G 146.68(c) JbPT G 146.68(c)	(2)
	Descriptio		-	Testing Require PERM on monitoring as requ		
18	Date:	04/19/2017	(1402109)	Cla	ssification: M	oderate
	Self Repo	rt? NO	For Infor	mational Pu		
	Citation:	30 TAC C 30 TAC C 40 CFR C 40 CFR C PP.VIII.A	Chapter 305, Sub Chapter 331, Sub Chapter 146, Sub Chapter 146, Sub Monitoring and	Chapter F 305.125 Chapter D 331.64(g)( Chapter D, PT 146, S Chapter D, PT 146, S Testing Require PERM	1) JbPT G 146.68(c) JbPT G 146.68(c) IT	(2)
	Descriptio	in: Failed to	perform corrosio	on monitoring as requ	red.	
19	Date:	05/26/2017	(1409010)	Cla	ssification: M	oderate
	Self Repo	rt? NO	For Infor	mational Pu	poses Onl	ly l
	Citation:	30 TAC 0 30 TAC 0	Chapter 116, Sub Chapter 116, Sub Chapter 382 38 MIT	Chapter A 101.20(3) Chapter B 116.115(b Chapter B 116.115(c) 2.085(b)		
	Descriptio	event tha Specifica Ibs of am 13 Ibs of Permit N	at was discovere Illy, Invista SARL Imonia, 37 lbs of other organics f	orized emission to the d on March 3, 2017, T , released unauthorize hexamethlenediamin om EPN 04VNT-007. b/hr limit for ammoni	CEQ/STEERS Inci ed emissions in th e, 5 lbs of unspec The event lasted	dent No. 253703. e amount of 2892 iated VOC, and 23 minutes.
				e exceeded		
20	Date:	06/30/2017	(1439832)		ssification: M	oderate
20	Self Repo	06/30/2017 rt? YES	(1439832) For Infor	cla mational Pu		
20	Self Repo Citation:	06/30/2017 rt? YES 2D TWC 30 TAC C	(1439832) For Infor Chapter 26, Sub Chapter 305, Sub	Cla Chapter A 26.121(a) Chapter F 305.125(1)	poses Onl	
	Self Repo Citation: Descriptio	06/30/2017 rt? YES 2D TWC 30 TAC C on: Failure to	(1439832) For Infor Chapter 26, Sub Chapter 305, Sub pomeet the limit	Cla mational Pur Chapter A 26.121(a)	poses Onl	
20 21	Self Repo Citation:	06/30/2017 rt? YES 2D TWC 30 TAC C	(1439832) For Infor Chapter 26, Sub Chapter 305, Sub	Cla Chapter A 26.121(a) Chapter F 305.125(1) or one or more permi	poses Onl	
	Self Repo Citation: Descriptio	06/30/2017 rt? YES 2D TWC 30 TAC C on: Failure to 07/07/2017	(1439832) For Infor Chapter 26, Sub Chapter 305, Sub o meet the limit (1422568)	Cla Chapter A 26.121(a) Chapter F 305.125(1) or one or more permi	poses Onl t parameter ssification: Mo	oderate
	Self Repo Citation: Descriptio Date:	06/30/2017 rt? YES 2D TWC 30 TAC C on: Failure to 07/07/2017 rt? NO 30 TAC C 30 TAC C	(1439832) For Infor Chapter 26, Sub Chapter 305, Sub to meet the limit (1422568) For Infor Chapter 111, Sub Chapter 116, Sub Chapter 382 38	Cla Chapter A 26.121(a) Chapter F 305.125(1) or one or more permi Cla Cla Chapter A 111.111(a) Chapter B 116.115(c)	poses Onl t parameter ssification: Ma poses Onl (1)(C)	oderate
	Self Report Citation: Description Date: Self Report	06/30/2017 rt? YES 2D TWC 30 TAC C on: Failure to 07/07/2017 rt? NO 30 TAC C 30 TAC C 30 TAC C 5C THSC SC No. 3 on: Failure to averaged SARL reliant an event 248035. continuo	(1439832) For Infor Chapter 26, Sub Chapter 305, Sub to meet the limit for (1422568) For Infor Chapter 111, Sub Chapter 116, Sub Chapter 382 38 PERMIT to prevent visible d over a six-minu- eased visible em that was discov The opacity event	Cla Chapter A 26.121(a) Chapter F 305.125(1) or one or more permi Cla Cla Chapter A 111.111(a) Chapter B 116.115(c)	poses Onl t parameter ssification: Ma poses Onl (1)(C) greater than a li ISTK-001. Specifi acity from EPN 14 2016, TCEQ/STEE Opacity was meas	oderate y imit of 10% cally, Invista ISTK-001 during RS Incident No. sured by a
	Self Repor Citation: Descriptio Date: Self Repor Citation:	06/30/2017 rt? YES 2D TWC 30 TAC C on: Failure to 07/07/2017 rt? NO 30 TAC C 30 TAC C 30 TAC C 5C THSC SC No. 3 on: Failure to averaged SARL reliant an event 248035. continuo	(1439832) For Infor Chapter 26, Sub Chapter 305, Sub to meet the limit for (1422568) For Infor Chapter 111, Sub Chapter 116, Sub Chapter 382 38 PERMIT to prevent visible d over a six-minu- eased visible em that was discov The opacity event us opacity monit	Cla Chapter A 26.121(a) Chapter F 305.125(1) or one or more permi Cla Chapter A 111.111(a) Chapter A 111.111(a) Chapter B 116.115(c) 2.085(b) emissions with opacitit te period from EPN 14 ssions with 46.6% op pered on December 2, at lasted 12 minutes. pring system (COMS).	poses Onl t parameter ssification: Me poses Onl (1)(C) y greater than a li ISTK-001. Specifi acity from EPN 14 2016, TCEQ/STEE Opacity was meas The unauthorized	oderate y imit of 10% cally, Invista ISTK-001 during RS Incident No. sured by a d opacity was the
21	Self Repor Citation: Descriptio Date: Self Repor Citation: Descriptio	06/30/2017 rt? YES 2D TWC 30 TAC C on: Failure to 07/07/2017 rt? NO 30 TAC C 30 TAC C 30 TAC C 5C THSC SC No. 3 on: Failure to an event 248035. continuo result of 07/21/2017	(1439832) For Infor Chapter 26, Sub Chapter 305, Sub to meet the limit (1422568) For Infor Chapter 111, Sub Chapter 116, Sub Chapter 382 38 PERMIT o prevent visible d over a six-minu- eased visible em- that was discov The opacity even us opacity monit operator error. (1424158)	Cla Chapter A 26.121(a) Chapter F 305.125(1) or one or more permi Cla Chapter A 111.111(a) Chapter A 111.111(a) Chapter B 116.115(c) 2.085(b) emissions with opacitit te period from EPN 14 ssions with 46.6% op pered on December 2, t lasted 12 minutes. pring system (COMS).	poses Onl t parameter ssification: Me poses Onl (1)(C) y greater than a li STK-001. Specifi acity from EPN 14 2016, TCEQ/STEE Dpacity was meas The unauthorized	oderate y imit of 10% cally, Invista ISTK-001 during RS Incident No. sured by a d opacity was the
21	Self Repo Citation: Descriptio Date: Self Repo Citation: Descriptio	06/30/2017 rt? YES 2D TWC 30 TAC C on: Failure to 07/07/2017 rt? NO 30 TAC C 30 TAC C 30 TAC C 5C THSC SC No. 3 on: Failure to an event 248035. continuo result of 07/21/2017	(1439832) For Infor Chapter 26, Sub Chapter 305, Sub to meet the limit in (1422568) For Infor Chapter 111, Sub Chapter 116, Sub Chapter 116, Sub Chapter 382 38 PERMIT to prevent visible d over a six-minute eased visible em that was discove The opacity event us opacity monitor operator error. (1424158) For Infor	Cla Chapter A 26.121(a) Chapter F 305.125(1) or one or more permi Cla Chapter A 111.111(a) Chapter A 111.111(a) Chapter B 116.115(c) 2.085(b) emissions with opacitit te period from EPN 14 ssions with 46.6% op pered on December 2, at lasted 12 minutes. pring system (COMS).	poses Onl t parameter ssification: Me poses Onl (1)(C) y greater than a li STK-001. Specifi acity from EPN 14 2016, TCEQ/STEE Dpacity was meas The unauthorized	oderate y imit of 10% cally, Invista ISTK-001 during RS Incident No. sured by a d opacity was the
21	Self Report Citation: Description Date: Self Report Citation: Description	06/30/2017 rt? YES 2D TWC 30 TAC C 30 TAC C 07/07/2017 rt? NO 30 TAC C 30 TAC C 30 TAC C 5C THSC SC No. 3 on: Failure to averaged SARL relu- an event 248035. continuoo result of 07/21/2017 rt? NO 1902 STC 23271 SC	(1439832) For Infor Chapter 26, Sub Chapter 305, Sub to meet the limit is (1422568) For Infor Chapter 111, Sub Chapter 116, Sub Chapter 116, Sub Chapter 382 38 PERMIT to prevent visible d over a six-minu- eased visible em that was discov The opacity event us opacity monit operator error. (1424158) For Infor C 21 OP C1 PERMIT	Cla Chapter A 26.121(a) Chapter F 305.125(1) or one or more permi Cla Chapter A 111.111(a) Chapter A 111.111(a) Chapter B 116.115(c) 2.085(b) emissions with opacit te period from EPN 14 ssions with 46.6% op pered on December 2, at lasted 12 minutes. pring system (COMS). Cla Cla	poses Onl t parameter ssification: Mo poses Onl (1)(C) greater than a li (STK-001. Specific acity from EPN 14 2016, TCEQ/STEE Opacity was meas The unauthorized ssification: Mo poses Onl	oderate y imit of 10% cally, Invista ISTK-001 during RS Incident No. sured by a d opacity was the
21	Self Report Citation: Description Date: Self Report Citation: Description	06/30/2017 rt? YES 2D TWC 30 TAC C 30 TAC C 07/07/2017 rt? NO 30 TAC C 30 TAC C 30 TAC C 5C THSC SC No. 3 on: Failure to averaged SARL reliance an event 248035. continuo result of 07/21/2017 rt? NO 1902 STC 23271 SC 30 TAC C 30 TAC C	(1439832) For Infor Chapter 26, Sub Chapter 305, Sub to meet the limit is (1422568) For Infor Chapter 111, Sub Chapter 116, Sub Chapter 116, Sub Chapter 382 38 PERMIT to prevent visible d over a six-minu- eased visible em- that was discov The opacity event us opacity monit operator error. (1424158) For Infor C 21 OP C1 PERMIT Chapter 116, Sub	Cla Chapter A 26.121(a) Chapter F 305.125(1) or one or more permi Cla Chapter A 111.111(a) Chapter A 111.111(a) Chapter B 116.115(c) 2.085(b) emissions with opacit te period from EPN 14 ssions with 46.6% op pered on December 2, at lasted 12 minutes. pring system (COMS). Cla Chapter B 116.115(a) Chapter B 116.115(a) Chapter B 116.115(a)	poses Onl t parameter ssification: Ma poses Onl (1)(C) y greater than a li ISTK-001. Specifi acity from EPN 14 2016, TCEQ/STEE Dpacity was meas The unauthorized ssification: Ma poses Onl	oderate y imit of 10% cally, Invista ISTK-001 during RS Incident No. sured by a d opacity was the

	applicable state permit. Specifically, Invista exceeded the hourly maximum fill rate permit representations 18 times from May 1, 2016 and April 30, 2017 for the Refined HMI Tank, Big A Crude HMD Tank, Big B Crude HMD Tank, Self Leachate Tank, Wet Organics Tank, Misc. Slurries Sump, and East BZ Receiver. Classification: Moderate
Self Report?	NO For Informational Purposes Only
Citation:	1902 STC 17 OP
	23271 SC 5 PERMIT 30 TAC Chapter 116, SubChapter B 116.115(c)
	30 TAC Chapter 122, SubChapter B 122.143(4)
Description:	5C THSC Chapter 382 382.085(b) Failure to comply with the NOx emissions factor requirements listed in an applicable state permit. Specifically, Invista exceeded the emissions factor of 0.06 pounds of NOx per MMBtu while firing rates were greater than 130 MMBtu for the Hydrogen Reformer Unit eleven (11) times from May 1, 2016 through April 30, 2017.
	Classification: Moderate
Self Report?	NO For Informational Purposes Only
Citation:	1902 STC 3A PERMIT
	30 TAC Chapter 111, SubChapter A 111.111(a)(8)(B)(i) 30 TAC Chapter 122, SubChapter B 122.143(4) 5C THSC Chapter 382 382.085(b)
Description:	Failure to perform visible emissions evaluations. Specifically, Invista failed to
	perform Method 9 visible emissions evaluations from July 1, 2016 through
	September 30, 2016 on the Water Pump Engine and from April 1, 2016 through June 30, 2016 on the Fire Pump Engine.
	Classification: Moderate
Self Report?	NO For Informational Purposes Only
Citation:	1902 STC 17 OP
	23271 SC1 PERMIT
	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 63, SubChapter C, PT 63, SubPT H 63.167(a)(1) 5C THSC Chapter 382 382.085(b)
Description:	Failure to prevent fugitive emissions from Open Ended Lines (OEL). Specifically,
	Invista discovered seven open ended lines from May 1, 2016 through April 30,
	2017. Classification: Moderate
Self Report?	NO For Informational Purposes Only
Citation:	23271 SC 9 PERMIT
	30 TAC Chapter 116, SubChapter B 116.115(b)(2)(C)
	30 TAC Chapter 122, SubChapter B 122.143(4) 5C THSC Chapter 382 382.085(b)
Description:	Failure to adequately record when the baghouse was in operation. Specifically,
	Invista failed to record when the baghouse EPN: 11BAG311 was in operation
	sixteen times from May 1, 2016 through April 30, 2017.
Date: 07,	/28/2017 (1420813)
	Classification: Moderate
Self Report?	NO For Informational Purposes Only
Citation:	30 TAC Chapter 101, SubChapter A 101.20(2)
	30 TAC Chapter 116, SubChapter B 116.115(c) 30 TAC Chapter 122, SubChapter B 122.143
	40 CFR Chapter 63, SubChapter C, PT 63, SubPT EEE 63.1217(a)(5)(i)
	5C THSC Chapter 382 382.085(b) 812, SC 5C PERMIT
Description:	Failure to comply with carbon monoxide (CO) emissions limit as specified by 40
2 000	Code of Federal Regulations 63.1217(a)(5)(i).
	Classification: Moderate
Self Report?	NO For Informational Purposes Only
Citation:	30 TAC Chapter 116, SubChapter B 116.115(c)
	30 TAC Chapter 122, SubChapter B 122.143 5C THSC Chapter 382 382.085(b)
	812 SC 12A PERMIT
Description:	Failure to record the HCL Tank scrubber flow rate. Specifically, Invista failed to
	record the HCL Tank scrubber flow rate on three days between March 19, 2016 and July 2, 2016.
	Classification: Moderate

Classification: Moderate

Self Report?	NO For Informational Purposes Only
Citation:	30 TAC Chapter 101, SubChapter A 101.20(2)
	30 TAC Chapter 116, SubChapter B 116.115(c) 40 CFR Chapter 61, SubChapter C, PT 61, SubPT FF 61.354(d)
	40 CFR Chapter 61, SubChapter C, PT 61, SubPT FF 61.356(j)(10)
Description:	5C THSC Chapter 382 382.085(b) Failure to record the monitoring time for the Distillate Dumpster Carbon Adsorber.
	Specifically, Invista failed to record the time the adsorber was monitored on
	February 2, 2016.
Data: 00	(21/2017 (1/20015)
Date: 08/	/31/2017 (1429815) Classification: Moderate
Self Report?	NO For Informational Purposes Only
Citation:	30 TAC Chapter 101, SubChapter A 101.20(3)
	30 TAC Chapter 113, SubChapter C 113.100 30 TAC Chapter 116, SubChapter B 116.115(c)
	30 TAC Chapter 122, SubChapter B 122.143(4)
	30 TAC Chapter 122, SubChapter C 122.210(a) 40 CFR Chapter 63, SubChapter C, PT 63, SubPT A 63.6(e)(3)
	5C THSC Chapter 382 382.085(b) PERMIT 1904, FOP No. O-1904, STC 10 OP
	PERMIT 1904, FOP No. O-1904, STC 11 OP
	PERMIT 1904, FOP No. O-1904, STC 1E OP PERMIT 1904, FOP No. O-1904, STC 29 OP
Description	PERMIT 7186, NSR No. 7186, SC 4 PERMIT
Description:	Failure to update the startup, shutdown, and malfunction plan (SSMP). Classification: Moderate
Self Report?	NO For Informational Purposes Only
Citation:	30 TAC Chapter 101, SubChapter A 101.20(3) 30 TAC Chapter 116, SubChapter B 116.115(c)
	30 TAC Chapter 116, SubChapter B 116.116
	30 TAC Chapter 122, SubChapter B 122.143(4) 5C THSC Chapter 382 382.085(b)
	PERMIT 1904, FOP No. O-1904, STC 24 OP PERMIT 7186, NSR No. 7186, SC 1 PERMIT
Description:	Failure to comply with representations and conditions of FOP No. 0-1904.
	Classification: Moderate
Self Report? Citation:	NO For Informational Purposes Only 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) PERMIT 1904, FOP No. O-1904, STC 1A OP
Description:	Failure to conduct visible emission monitoring. Classification: Minor
Self Report?	NO For Informational Purposes Only
Citation:	30 TAC Chapter 101, SubChapter A 101.20(3)
	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)
	PERMIT 1904, FOP No. O-1904, STC 1A OP PERMIT 1904, FOP No. O-1904, STC 29 OP
Description	PERMIT 7186, NSR No. 7186, SC 17E PERMIT
Description:	Failure to prevent fugitive emissions from Open Ended Lines (OEL). Classification: Moderate
Self Report?	NO For Informational Purposes Only
Citation:	30 TAC Chapter 101, SubChapter F 101.201(b) 30 TAC Chapter 122, SubChapter B 122.143(4)
	5C THSC Chapter 382 382.085(b)
Description:	PERMIT 1904, FOP No. O-1904, STC 2F OP Failure to create a final record of all reportable and non-reportable emissions
2 000.10000	events no later than two weeks after the end of an emissions event.
	Classification: Moderate NO For Informational Purposes Only
Self Report? Citation:	NO FOR INFORMATIONAL PURPOSES ONLY 30 TAC Chapter 101, SubChapter A 101.20(3)
	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)
	D

	PERMIT 1904, FOP No. O-1904, STC 1A OP PERMIT 1904, FOP No. O-1904, STC 29 OP PERMIT 7186, NSR No. 7186, SC 11 PERMIT
Description:	Failure to record liquid flow rates and pH levels for the HCL Scrubber. Classification: Moderate
Self Report? Citation:	NO For Informational Purposes Only 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)
Description:	5C THSC Chapter 382 382.085(b) Failure to report all instances of a deviation. Classification: Moderate
Self Report? Citation:	NO For Informational Purposes Only 30 TAC Chapter 101, SubChapter A 101.20(3) 30 TAC Chapter 106, SubChapter K 106.263(g) 30 TAC Chapter 122, SubChapter B 122.143(4) 5C THSC Chapter 382 382.085(b) PERMIT 1904, FOP No. O-1904, STC 29 OP
Description:	Failure to maintain sufficient records for Maintenance, Start-up, and Shutdown (MSS) activities. Classification: Moderate
Self Report? Citation:	NO For Informational Purposes Only 30 TAC Chapter 101, SubChapter A 101.20(3) 30 TAC Chapter 116, SubChapter B 116.115(c) 30 TAC Chapter 122, SubChapter B 122.143(4)
Description:	40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.162 5C THSC Chapter 382 382.085(b) PERMIT 1904, FOP No. O-1904, STC 1A OP PERMIT 1904, FOP No. O-1904, STC 27 OP PERMIT 1904, FOP No. O-1904, STC 29 OP PERMIT 7186, NSR No. 7186, SC 17F PERMIT Failure to monitor valves, connectors, and replacements for leaking components.
	/11/2017 (1430479)
,	Classification: Minor
Self Report? Citation:	NO For Informational Purposes Only 30 TAC Chapter 101, SubChapter A 101.20(3) 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) SC 8(E) PERMIT STC 16 OP
Description:	Failure to equip each open-ended valve or line (OEL) with an appropriately sized cap, blind flange, plug, or a second valve to seal the line. Classification: Minor
Self Report? Citation:	NO For Informational Purposes Only 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) SC 7(E) PERMIT
Description:	STC 16 OP Failure to equip each open-ended valve or line (OEL) with an appropriately sized cap, blind flange, plug, or a second valve to seal the line. Classification: Moderate
Self Report? Citation:	NO For Informational Purposes Only 30 TAC Chapter 106, SubChapter S 106.433(8) 30 TAC Chapter 122, SubChapter B 122.143(4) 5C THSC Chapter 382 382.085(b) STC 16 OP
Description:	Failure to maintain sufficient records of surface coat activities. Classification: Moderate
Self Report? Citation:	NO For Informational Purposes Only 30 TAC Chapter 106, SubChapter S 106.433(7)(A) 30 TAC Chapter 122, SubChapter B 122.143(4) 5C THSC Chapter 382 382.085(b) STC 16 OP
Description:	Failure to emit no more than 6 pounds per hour (lb/hr) of volatile organic compound (VOC) emissions, averaged over any five-hour period, from surface Page 25

coating operations. Classification: Moderate For Informational Purposes Only Self Report? NO 30 TAC Chapter 101, SubChapter F 101.201(b) Citation: 30 TAC Chapter 122, SubChapter B 122.143(4) 5C THSC Chapter 382 382.085(b) STC 2(F) OP Description: Failure to create final records of non-reportable (recordable) emissions events no later than two weeks after the end of the events. Classification: Moderate For Informational Purposes Only Self Report? NO 30 TAC Chapter 101, SubChapter A 101.20(3) 30 TAC Chapter 116, SubChapter B 116.115(c) Citation: 5C THSC Chapter 382 382.085(b) SC 1 PERMIT Description: Failure to prevent unauthorized emissions to the atmosphere during non-reportable (recordable) emissions events. Classification: Moderate For Informational Purposes Only Self Report? NO Citation: 30 TAC Chapter 101, SubChapter A 101.20(1) 30 TAC Chapter 101, SubChapter A 101.20(3) 30 TAC Chapter 116, SubChapter B 116.115(b)(2)(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 60.7 5C THSC Chapter 382 382.085(b) GC 3 PERMIT STC 16 OP STC 2(F) OP Failure to report start of construction, construction interruptions exceeding 45 Description: days, or completion of construction no later than 15 working days after the occurrence of the event. Classification: Moderate For Informational Purposes Only Self Report? NO 30 TAC Chapter 106, SubChapter T 106.452 Citation: 30 TAC Chapter 122, SubChapter B 122.143(4) 5C THSC Chapter 382 382.085(b) STC 16 OP Description: Failure to comply with the maximum filtering velocity requirements for fabric filters. 01/31/2018 (1486758)Date: Classification: Moderate For Informational Purposes Only Self Report? YES 2D TWC Chapter 26, SubChapter A 26.121(a) Citation: 30 TAC Chapter 305, SubChapter F 305.125(1) Description: Failure to meet the limit for one or more permit parameter 02/28/2018 (1490435)Date: Classification: Moderate For Informational Purposes Only Self Report? YES 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 Date: 04/10/2018 (1478976)Classification: Moderate For Informational Purposes Unly Self Report? NO 30 TAC Chapter 116, SubChapter B 116.115(c) Citation: 30 TAC Chapter 122, SubChapter B 122.143(4) 5C THSC Chapter 382 382.085(b) 809 SC 12 PERMIT 812 SC 14 PERMIT 813 SC 17 PERMIT Description: Failure to maintain MSS emissions records. Specifically, Invista failed to maintain and sum MSS emissions records for the rolling 12-month emissions on a monthly Page 26

26

27

	basis from February 1, 2017 through January 31, 2018. Classification: Moderate
Self Report?	NO For Informational Purposes Only
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)
Description:	809 SC 7B PERMIT Failure to maintain AVO records. Specifically, Invista failed to maintain AVO
	records for NH3 leaks within the operating area at least once in every four hour block on May 4, 2017.
	Classification: Moderate
Self Report?	NO For Informational Purposes Only
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) 813 SC 12E PERMIT
Description:	Failure to prevent fugitive emissions from Open Ended Lines (OEL). Specifically,
	Invista discovered three open ended lines on April 24, 2017, October 20, 2017, and September 9, 2017.
Date: 06/	29/2018 (1483974)
	Classification: Moderate
Self Report?	NO For Informational Purposes Only
Citation:	2D TWC Chapter 26, SubChapter A 26.121(a)(1) 30 TAC Chapter 305, SubChapter F 305.125(1)
Description:	Permit Conditions; No. 2g, Pg. 7 PERMIT Failed to prevent an unauthorized discharge of wastewater or any other waste.
Description	Classification: Minor
Self Report?	NO For Informational Purposes Only
Citation:	30 TAC Chapter 305, SubChapter F 305.125(1) Monitoring Requirements; No.5, Pg. 5 PERMIT
Description:	Failed to accurately calibrate all automatic flow measuring or recording devices and all totalizing meters for measuring flows by a trained person at plant start-up
	and as often thereafter as necessary to ensure accuracy, but not less often than annually.
	Classification: Minor
Self Report?	NO For Informational Purposes Only
Self Report? Citation:	
•	NO For Informational Purposes Only 30 TAC Chapter 305, SubChapter F 305.125(1) Monitoring Requirements No. 2, Pg. 4 PERMIT Failed to accurately accomplish in a representative manner all measurements,
Citation:	NO For Informational Purposes Only 30 TAC Chapter 305, SubChapter F 305.125(1) Monitoring Requirements No. 2, Pg. 4 PERMIT Failed to accurately accomplish in a representative manner all measurements, tests and calculations. Classification: Minor
Citation: Description: Self Report?	NO         For Informational Purposes Only           30 TAC Chapter 305, SubChapter F 305.125(1)         Monitoring Requirements No. 2, Pg. 4 PERMIT           Failed to accurately accomplish in a representative manner all measurements, tests and calculations.         Classification: Minor           NO         For Informational Purposes Only
Citation: Description:	NO       For Informational Purposes Only         30 TAC Chapter 305, SubChapter F 305.125(1)         Monitoring Requirements No. 2, Pg. 4 PERMIT         Failed to accurately accomplish in a representative manner all measurements, tests and calculations.         Classification:       Minor         NO       For Informational Purposes Only         30 TAC Chapter 305, SubChapter F 305.125(1)         30 TAC Chapter 305, SubChapter F 305.125(1)         30 TAC Chapter 305, SubChapter F 305.125(5)
Citation: Description: Self Report? Citation:	NO For Informational Purposes Only 30 TAC Chapter 305, SubChapter F 305.125(1) Monitoring Requirements No. 2, Pg. 4 PERMIT Failed to accurately accomplish in a representative manner all measurements, tests and calculations. Classification: Minor NO For Informational Purposes Only 30 TAC Chapter 305, SubChapter F 305.125(1) 30 TAC Chapter 305, SubChapter F 305.125(5) Operational Requirements; No. 1, Pg. 9 PERMIT
Citation: Description: Self Report?	NO For Informational Purposes Only 30 TAC Chapter 305, SubChapter F 305.125(1) Monitoring Requirements No. 2, Pg. 4 PERMIT Failed to accurately accomplish in a representative manner all measurements, tests and calculations. Classification: Minor NO For Informational Purposes Only 30 TAC Chapter 305, SubChapter F 305.125(1) 30 TAC Chapter 305, SubChapter F 305.125(5) Operational Requirements; No. 1, Pg. 9 PERMIT Failed to ensure that the facility and all of its systems of collection, treatment, and disposal are properly operated and maintained. This includes, but is not
Citation: Description: Self Report? Citation:	NO       For Informational Purposes Only         30 TAC Chapter 305, SubChapter F 305.125(1)         Monitoring Requirements No. 2, Pg. 4 PERMIT         Failed to accurately accomplish in a representative manner all measurements, tests and calculations.         Classification:       Minor         NO       For Informational Purposes Only         30 TAC Chapter 305, SubChapter F 305.125(1)         30 TAC Chapter 305, SubChapter F 305.125(5)         Operational Requirements; No. 1, Pg. 9 PERMIT         Failed to ensure that the facility and all of its systems of collection, treatment, and disposal are properly operated and maintained. This includes, but is not limited to, the regular, periodic examination of wastewater solids within the treatment plant by the operator in order to maintain an appropriate quantity and
Citation: Description: Self Report? Citation:	NO For Informational Purposes Only 30 TAC Chapter 305, SubChapter F 305.125(1) Monitoring Requirements No. 2, Pg. 4 PERMIT Failed to accurately accomplish in a representative manner all measurements, tests and calculations. Classification: Minor NO For Informational Purposes Only 30 TAC Chapter 305, SubChapter F 305.125(1) 30 TAC Chapter 305, SubChapter F 305.125(5) Operational Requirements; No. 1, Pg. 9 PERMIT Failed to ensure that the facility and all of its systems of collection, treatment, and disposal are properly operated and maintained. This includes, but is not limited to, the regular, periodic examination of wastewater solids within the
Citation: Description: Self Report? Citation:	NO       For Informational Purposes Only         30 TAC Chapter 305, SubChapter F 305.125(1)         Monitoring Requirements No. 2, Pg. 4 PERMIT         Failed to accurately accomplish in a representative manner all measurements, tests and calculations.         Classification:       Minor         NO       For Informational Purposes Only         30 TAC Chapter 305, SubChapter F 305.125(1)         30 TAC Chapter 305, SubChapter F 305.125(5)         Operational Requirements; No. 1, Pg. 9 PERMIT         Failed to ensure that the facility and all of its systems of collection, treatment, and disposal are properly operated and maintained. This includes, but is not limited to, the regular, periodic examination of wastewater solids within the treatment plant by the operator in order to maintain an appropriate quantity and
Citation: Description: Self Report? Citation: Description:	NO For Informational Purposes Only 30 TAC Chapter 305, SubChapter F 305.125(1) Monitoring Requirements No. 2, Pg. 4 PERMIT Failed to accurately accomplish in a representative manner all measurements, tests and calculations. Classification: Minor NO For Informational Purposes Only 30 TAC Chapter 305, SubChapter F 305.125(1) 30 TAC Chapter 305, SubChapter F 305.125(5) Operational Requirements; No. 1, Pg. 9 PERMIT Failed to ensure that the facility and all of its systems of collection, treatment, and disposal are properly operated and maintained. This includes, but is not limited to, the regular, periodic examination of wastewater solids within the treatment plant by the operator in order to maintain an appropriate quantity and quality of solids inventory as described in the various operator training manuals and according to accepted industry standards for process control. 11/2018 (1489984)
Citation: Description: Self Report? Citation: Description: Date: 07/	NO For Informational Purposes Only 30 TAC Chapter 305, SubChapter F 305.125(1) Monitoring Requirements No. 2, Pg. 4 PERMIT Failed to accurately accomplish in a representative manner all measurements, tests and calculations. Classification: Minor NO For Informational Purposes Only 30 TAC Chapter 305, SubChapter F 305.125(1) 30 TAC Chapter 305, SubChapter F 305.125(5) Operational Requirements; No. 1, Pg. 9 PERMIT Failed to ensure that the facility and all of its systems of collection, treatment, and disposal are properly operated and maintained. This includes, but is not limited to, the regular, periodic examination of wastewater solids within the treatment plant by the operator in order to maintain an appropriate quantity and quality of solids inventory as described in the various operator training manuals and according to accepted industry standards for process control. 11/2018 (148984) Classification: Minor
Citation: Description: Self Report? Citation: Description:	NO For Informational Purposes Only 30 TAC Chapter 305, SubChapter F 305.125(1) Monitoring Requirements No. 2, Pg. 4 PERMIT Failed to accurately accomplish in a representative manner all measurements, tests and calculations. Classification: Minor NO For Informational Purposes Only 30 TAC Chapter 305, SubChapter F 305.125(1) 30 TAC Chapter 305, SubChapter F 305.125(5) Operational Requirements; No. 1, Pg. 9 PERMIT Failed to ensure that the facility and all of its systems of collection, treatment, and disposal are properly operated and maintained. This includes, but is not limited to, the regular, periodic examination of wastewater solids within the treatment plant by the operator in order to maintain an appropriate quantity and quality of solids inventory as described in the various operator training manuals and according to accepted industry standards for process control. 11/2018 (1489984) Classification: Minor NO For Informational Purposes Only 23271 SC14 OP
Citation: Description: Self Report? Citation: Description: Date: 07/ Self Report?	NO       For Informational Purposes Only         30 TAC Chapter 305, SubChapter F 305.125(1)         Monitoring Requirements No. 2, Pg. 4 PERMIT         Failed to accurately accomplish in a representative manner all measurements, tests and calculations.         Classification:       Minor         NO       For Informational Purposes Only         30 TAC Chapter 305, SubChapter F 305.125(1)         30 TAC Chapter 305, SubChapter F 305.125(5)         Operational Requirements; No. 1, Pg. 9 PERMIT         Failed to ensure that the facility and all of its systems of collection, treatment, and disposal are properly operated and maintained. This includes, but is not limited to, the regular, periodic examination of wastewater solids within the treatment plant by the operator in order to maintain an appropriate quantity and quality of solids inventory as described in the various operator training manuals and according to accepted industry standards for process control.         11/2018       (1489984)         NO       For Informational Purposes Only         23271 SC14 OP       30 TAC Chapter 101, SubChapter A 101.20(1)
Citation: Description: Self Report? Citation: Description: Date: 07/ Self Report?	NO For Informational Purposes Only 30 TAC Chapter 305, SubChapter F 305.125(1) Monitoring Requirements No. 2, Pg. 4 PERMIT Failed to accurately accomplish in a representative manner all measurements, tests and calculations. Classification: Minor NO For Informational Purposes Only 30 TAC Chapter 305, SubChapter F 305.125(1) 30 TAC Chapter 305, SubChapter F 305.125(5) Operational Requirements; No. 1, Pg. 9 PERMIT Failed to ensure that the facility and all of its systems of collection, treatment, and disposal are properly operated and maintained. This includes, but is not limited to, the regular, periodic examination of wastewater solids within the treatment plant by the operator in order to maintain an appropriate quantity and quality of solids inventory as described in the various operator training manuals and according to accepted industry standards for process control. 11/2018 (1489984) Classification: Minor NO For Informational Purposes Only 23271 SC14 OP 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)
Citation: Description: Self Report? Citation: Description: Date: 07/ Self Report? Citation:	NO For Informational Purposes Only 30 TAC Chapter 305, SubChapter F 305.125(1) Monitoring Requirements No. 2, Pg. 4 PERMIT Failed to accurately accomplish in a representative manner all measurements, tests and calculations. Classification: Minor NO For Informational Purposes Only 30 TAC Chapter 305, SubChapter F 305.125(1) 30 TAC Chapter 305, SubChapter F 305.125(5) Operational Requirements; No. 1, Pg. 9 PERMIT Failed to ensure that the facility and all of its systems of collection, treatment, and disposal are properly operated and maintained. This includes, but is not limited to, the regular, periodic examination of wastewater solids within the treatment plant by the operator in order to maintain an appropriate quantity and quality of solids inventory as described in the various operator training manuals and according to accepted industry standards for process control. 11/2018 (1489984) Classification: Minor NO For Informational Purposes Only 23271 SC14 OP 30 TAC Chapter 101, SubChapter A 101.20(1) 30 TAC Chapter 116, SubChapter A 101.20(1) 30 TAC Chapter 116, SubChapter B 116.115(C) 30 TAC Chapter 116, SubChapter B 116.115(C) 30 TAC Chapter 122, SubChapter B 122.143(4) 40 CFR Chapter 163, SubChapter C, PT 63, SubPT H 63.167(a)(1) 5C THSC Chapter 382 382.085(b)
Citation: Description: Self Report? Citation: Description: Date: 07/ Self Report?	NO For Informational Purposes Only 30 TAC Chapter 305, SubChapter F 305.125(1) Monitoring Requirements No. 2, Pg. 4 PERMIT Failed to accurately accomplish in a representative manner all measurements, tests and calculations. Classification: Minor NO For Informational Purposes Only 30 TAC Chapter 305, SubChapter F 305.125(1) 30 TAC Chapter 305, SubChapter F 305.125(5) Operational Requirements; No. 1, Pg. 9 PERMIT Failed to ensure that the facility and all of its systems of collection, treatment, and disposal are properly operated and maintained. This includes, but is not limited to, the regular, periodic examination of wastewater solids within the treatment plant by the operator in order to maintain an appropriate quantity and quality of solids inventory as described in the various operator training manuals and according to accepted industry standards for process control. 11/2018 (1489984) Classification: Minor NO For Informational Purposes Only 23271 SC14 OP 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 1382 382.085(b) Failure to prevent fugitive emissions from Open Ended Lines (OEL). Specifically, Invista discovered one open ended line on August 18, 2017.
Citation: Description: Self Report? Citation: Description: Date: 07/ Self Report? Citation: Description:	NO For Informational Purposes Only 30 TAC Chapter 305, SubChapter F 305.125(1) Monitoring Requirements No. 2, Pg. 4 PERMIT Failed to accurately accomplish in a representative manner all measurements, tests and calculations. Classification: Minor NO For Informational Purposes Only 30 TAC Chapter 305, SubChapter F 305.125(1) 30 TAC Chapter 305, SubChapter F 305.125(5) Operational Requirements; No. 1, Pg. 9 PERMIT Failed to ensure that the facility and all of its systems of collection, treatment, and disposal are properly operated and maintained. This includes, but is not limited to, the regular, periodic examination of wastewater solids within the treatment plant by the operator in order to maintain an appropriate quantity and quality of solids inventory as described in the various operator training manuals and according to accepted industry standards for process control. 11/2018 (1489984) Classification: Minor NO For Informational Purposes Only 23271 SC14 OP 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 138 2382.085(b) Failure to prevent fugitive emissions from Open Ended Lines (OEL). Specifically, Invista discovered one open ended line on August 18, 2017. Classification: Minor
Citation: Description: Self Report? Citation: Description: Date: 07/ Self Report? Citation:	NO For Informational Purposes Only 30 TAC Chapter 305, SubChapter F 305.125(1) Monitoring Requirements No. 2, Pg. 4 PERMIT Failed to accurately accomplish in a representative manner all measurements, tests and calculations. Classification: Minor NO For Informational Purposes Only 30 TAC Chapter 305, SubChapter F 305.125(1) 30 TAC Chapter 305, SubChapter F 305.125(5) Operational Requirements; No. 1, Pg. 9 PERMIT Failed to ensure that the facility and all of its systems of collection, treatment, and disposal are properly operated and maintained. This includes, but is not limited to, the regular, periodic examination of wastewater solids within the treatment plant by the operator in order to maintain an appropriate quantity and quality of solids inventory as described in the various operator training manuals and according to accepted industry standards for process control. 11/2018 (1489984) Classification: Minor NO For Informational Purposes Only 23271 SC14 OP 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 1382 382.085(b) Failure to prevent fugitive emissions from Open Ended Lines (OEL). Specifically, Invista discovered one open ended line on August 18, 2017.

Citation:	23271 SC9 OP 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)
Description:	Failure to adequately record all of the information required by the bag filter daily inspection sheet. Specifically, Invista failed to record the pressure differential reading for the baghouse EPN: 11BAG311 on May 9, 2017 and May 10, 2017. Classification: Minor
Self Report?	NO For Informational Purposes Only
Citation:	30 TAC Chapter 116, SubChapter B 116.115(a) 30 TAC Chapter 122, SubChapter B 122.143(4) 5C THSC Chapter 382 382.085(b)
Description:	Failure to comply with the hourly maximum fill rate requirements listed in an applicable state permit. Specifically, Invista exceeded the hourly maximum fill rate permit representations 10 times from May 18, 2017 through April 20, 2018 for the Refined HMI Tank, Big A Crude HMD Tank, and the Big B Crude HMD Tank. Classification: Moderate
Self Report?	NO For Informational Purposes Only
Citation:	1902 ST&C 23 OP 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)
Description:	Failure to report all instances of deviations. Specifically, Invista did not report the exceedance of a one-time PBR authorized activity for the reporting period of May 1, 2017 through April 30, 2018.
	Classification: Minor
Self Report?	NO For Informational Purposes Only
Citation:	1902 ST&C1 OP 30 TAC Chapter 106, SubChapter K 106.261 30 TAC Chapter 106, SubChapter K 106.262 30 TAC Chapter 122, SubChapter B 122.143(4) 5C THSC Chapter 382 382.085(b)
Description:	Failure to comply with the one-time permitted PBR authorized activity requirements listed in a PBR. Specifically, Invista exceeded the one-time PBR authorized activity under 30 TAC §106.261 and §106.262. The PBR authorized the activity as a one-time activity with a duration not to exceed ten days. Invista subsequently determined that the activity had occurred two additional times during the reporting period of May 1, 2017 through April 30, 2018.
Date: 07,	/16/2018 (1489978)
	(1489978) Classification: Moderate
Self Report?	V16/2018     (1489978)       NO     For Informational Purposes Only
	(16/2018 (1489978) Classification: Moderate NO For Informational Purposes Only 30 TAC Chapter 101, SubChapter A 101.20(2)
Self Report?	(16/2018 (1489978) Classification: Moderate NO For Informational Purposes Only 30 TAC Chapter 101, SubChapter A 101.20(2) 30 TAC Chapter 101, SubChapter A 101.20(3) 30 TAC Chapter 116, SubChapter B 116.115(c)
Self Report?	(16/2018 (1489978) Classification: Moderate NO For Informational Purposes Only 30 TAC Chapter 101, SubChapter A 101.20(2) 30 TAC Chapter 101, SubChapter A 101.20(3) 30 TAC Chapter 116, SubChapter B 116.115(c) 30 TAC Chapter 122, SubChapter B 122.143(4)
Self Report?	(16/2018 (1489978) Classification: Moderate NO For Informational Purposes Only 30 TAC Chapter 101, SubChapter A 101.20(2) 30 TAC Chapter 101, SubChapter A 101.20(3) 30 TAC Chapter 116, SubChapter B 116.115(c)
Self Report?	Classification: Moderate NO For Informational Purposes Only 30 TAC Chapter 101, SubChapter A 101.20(2) 30 TAC Chapter 101, SubChapter A 101.20(3) 30 TAC Chapter 116, SubChapter B 116.115(c) 30 TAC Chapter 122, SubChapter B 122.143(4) 40 CFR Chapter 61, SubChapter C, PT 61, SubPT FF 61.346(b)(1) 5C THSC Chapter 382 382.085(b) FOP 1904 ST&C 1A & 9B OP NSR 7186 SC4 OP Failure to equip each drain with a water seal or a tightly sealed cap or plug. Specifically, On 07/18/2017 Invista found an instance of a missing cap on a
Self Report? Citation:	Classification: Moderate NO For Informational Purposes Only 30 TAC Chapter 101, SubChapter A 101.20(2) 30 TAC Chapter 101, SubChapter A 101.20(3) 30 TAC Chapter 116, SubChapter B 116.115(c) 30 TAC Chapter 122, SubChapter B 122.143(4) 40 CFR Chapter 61, SubChapter C, PT 61, SubPT FF 61.346(b)(1) 5C THSC Chapter 382 382.085(b) FOP 1904 ST&C 1A & 9B OP NSR 7186 SC4 OP Failure to equip each drain with a water seal or a tightly sealed cap or plug.
Self Report? Citation:	Classification: Moderate NO For Informational Purposes Only 30 TAC Chapter 101, SubChapter A 101.20(2) 30 TAC Chapter 101, SubChapter A 101.20(3) 30 TAC Chapter 116, SubChapter A 101.20(3) 30 TAC Chapter 116, SubChapter B 116.115(c) 30 TAC Chapter 122, SubChapter B 122.143(4) 40 CFR Chapter 61, SubChapter C, PT 61, SubPT FF 61.346(b)(1) 5C THSC Chapter 382 382.085(b) FOP 1904 ST&C 1A & 9B OP NSR 7186 SC4 OP Failure to equip each drain with a water seal or a tightly sealed cap or plug. Specifically, On 07/18/2017 Invista found an instance of a missing cap on a BWON drain system.
Self Report? Citation: Description:	Classification: Moderate NO For Informational Purposes Only 30 TAC Chapter 101, SubChapter A 101.20(2) 30 TAC Chapter 101, SubChapter A 101.20(3) 30 TAC Chapter 116, SubChapter B 116.115(c) 30 TAC Chapter 122, SubChapter B 122.143(4) 40 CFR Chapter 61, SubChapter C, PT 61, SubPT FF 61.346(b)(1) 5C THSC Chapter 382 382.085(b) FOP 1904 ST&C 1A & 9B OP NSR 7186 SC4 OP Failure to equip each drain with a water seal or a tightly sealed cap or plug. Specifically, On 07/18/2017 Invista found an instance of a missing cap on a BWON drain system. Classification: Minor NO For Informational Purposes Only 30 TAC Chapter 101, SubChapter A 101.20(3)
Self Report? Citation: Description: Self Report?	/16/2018       (1489978)         Classification:       Moderate         NO       For Informational Purposes Only         30 TAC Chapter 101, SubChapter A 101.20(2)       30 TAC Chapter 101, SubChapter A 101.20(3)         30 TAC Chapter 116, SubChapter B 116.115(c)       30 TAC Chapter 122, SubChapter B 122.143(4)         40 CFR Chapter 61, SubChapter C, PT 61, SubPT FF 61.346(b)(1)       5C THSC Chapter 382 382.085(b)         FOP 1904 ST&C 1A & 9B OP       NSR 7186 SC4 OP         Failure to equip each drain with a water seal or a tightly sealed cap or plug.         Specifically, On 07/18/2017 Invista found an instance of a missing cap on a BWON drain system.         NO       For Informational Purposes Only         30 TAC Chapter 101, SubChapter A 101.20(3)         30 TAC Chapter 101, SubChapter A 101.20(3)         30 TAC Chapter 116, SubChapter B 116.115(c)         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)
Self Report? Citation: Description: Self Report?	Classification: Moderate NO For Informational Purposes Only 30 TAC Chapter 101, SubChapter A 101.20(2) 30 TAC Chapter 101, SubChapter A 101.20(3) 30 TAC Chapter 116, SubChapter B 116.115(c) 30 TAC Chapter 122, SubChapter B 122.143(4) 40 CFR Chapter 61, SubChapter C, PT 61, SubPT FF 61.346(b)(1) 5C THSC Chapter 382 382.085(b) FOP 1904 ST&C 1A & 9B OP NSR 7186 SC4 OP Failure to equip each drain with a water seal or a tightly sealed cap or plug. Specifically, On 07/18/2017 Invista found an instance of a missing cap on a BWON drain system. Classification: Minor NO For Informational Purposes Only 30 TAC Chapter 101, SubChapter A 101.20(3) 30 TAC Chapter 116, SubChapter B 116.115(c) 30 TAC Chapter 122, SubChapter B 122.143(4)
Self Report? Citation: Description: Self Report? Citation:	<sup>1</sup> 16/2018 (1489978) Classification: Moderate No For Informational Purposes Only 30 TAC Chapter 101, SubChapter A 101.20(2) 30 TAC Chapter 101, SubChapter A 101.20(3) 30 TAC Chapter 116, SubChapter B 116.115(c) 30 TAC Chapter 122, SubChapter C, PT 61, SubPT FF 61.346(b)(1) 5C THSC Chapter 382 382.085(b) FOP 1904 ST&C 1A & 9B OP NSR 7186 SC4 OP Failure to equip each drain with a water seal or a tightly sealed cap or plug. Specifically, On 07/18/2017 Invista found an instance of a missing cap on a BWON drain system. Classification: Minor NO FOR Informational Purposes Only 30 TAC Chapter 101, SubChapter A 101.20(3) 30 TAC Chapter 101, SubChapter B 116.115(c) 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) NSR 7186 SC 14B OP Failure to complete tank throughput calculations. Specifically, Invista failed to complete the tank throughput calculations for two months from June 1, 2017 trough July 31, 2017.
Self Report? Citation: Description: Self Report? Citation:	<sup>16</sup> /2018 (148978) Classification: Moderate No For Informational Purposes Only 30 TAC Chapter 101, SubChapter A 101.20(2) 30 TAC Chapter 101, SubChapter A 101.20(3) 30 TAC Chapter 101, SubChapter A 101.20(3) 30 TAC Chapter 116, SubChapter B 116.115(c) 30 TAC Chapter 122, SubChapter B 112.143(4) 40 CFR Chapter 61, SubChapter C, PT 61, SubPT FF 61.346(b)(1). 50 F1904 ST&C 1A & 9B 0P NSR 7186 SC4 0P Rilure to equip each drain with a water seal or a tightly sealed cap or plug. Specifically, On 07/18/2017 Invista found an instance of a missing cap on a bwow drain system. Classification: Minor NO FORIOMATIONAL PURPOSES ONLS 30 TAC Chapter 101, SubChapter A 101.20(3) 30 TAC Chapter 116, SubChapter B 116.115(c) 30 TAC Chapter 116, SubChapter B 116.115(c) 30 TAC Chapter 122, SubChapter B 122.143(4) 50 TAC SC Chapter 382 382.085(b) NSR 7186 SC 148 OP Rairre to complete tank throughput calculations. Specifically, Invista failed to complete the tank throughput calculations for two months from June 1, 2017 Classification: Moderation Stering Juny 31, 2017.
Self Report? Citation: Description: Self Report? Citation:	<sup>1</sup> 16/2018 (1489978) Classification: Moderate No For Informational Purposes Only 30 TAC Chapter 101, SubChapter A 101.20(2) 30 TAC Chapter 101, SubChapter A 101.20(3) 30 TAC Chapter 116, SubChapter B 116.115(c) 30 TAC Chapter 122, SubChapter C, PT 61, SubPT FF 61.346(b)(1) 5C THSC Chapter 382 382.085(b) FOP 1904 ST&C 1A & 9B OP NSR 7186 SC4 OP Failure to equip each drain with a water seal or a tightly sealed cap or plug. Specifically, On 07/18/2017 Invista found an instance of a missing cap on a BWON drain system. Classification: Minor NO FOR Informational Purposes Only 30 TAC Chapter 101, SubChapter A 101.20(3) 30 TAC Chapter 101, SubChapter B 116.115(c) 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) NSR 7186 SC 14B OP Failure to complete tank throughput calculations. Specifically, Invista failed to complete the tank throughput calculations for two months from June 1, 2017 trough July 31, 2017.

Page 28

	5C THSC	Chapter 122, SubChapter B 122.143(4) C Chapter 382 382.085(b) 14 STC 1A OP
Description:	perform through	to perform visible emissions observations. Specifically, Invista failed to visible emissions observations fifteen (15) times from April 1, 2017 March 31, 2018 for the ADN Operating Flare, NH3 Startup Flare, ne Flare and the Cold NH3 Flare. Classification: Minor
Self Report?	NO	For Informational Purposes Only
Citation:		Chapter 101, SubChapter A 101.20(3)
	30 TAC ( 30 TAC ( 30 TAC ( 40 CFR ( 5C THSC FOP 190	Chapter 113, SubChapter C 113.130 Chapter 116, SubChapter B 116.115(c) Chapter 122, SubChapter B 122.143(4) Chapter 63, SubChapter C, PT 63, SubPT H 63.167(a)(2) C Chapter 382 382.085(b) 4 ST&C 1A & 28 OP 36 SC 17E OP
Description:	second v	to equip each open-ended line (OEL) with a cap, blind flange, plug, or valve to seal the line. Specifically, Invista discovered fifteen (15) open nes from April 1, 2017 through March 31, 2018.
Date: 10	/24/2018	(1512369)
		Classification: Moderate
Self Report?	NO	For Informational Purposes Only
Citation:		Chapter 101, SubChapter A 101.20(3) Chapter 116, SubChapter B 116.115(b)(2)(F)
		Chapter 116, SubChapter B 116.115(b)(2)(r)
Description:	event th No. 2764 amount VOC, 1.0	to prevent unauthorized emissions to the atmosphere during an emissions that was discovered on 01/15/18 at 0943 hours, TCEQ/STEERS Incident 473. Specifically, Invista Sarl released unauthorized emissions in the of 2,323.00 lbs of NH3, 1.00 lb of adiponitrile, 1.00 lb of unspeciated 00 lb of 1,2-diaminocyclohexane, 157.00 lbs of HMD, and 11.00 lbs of thyleneimine from the HMD Synthesis Building (EPNs 04VNT007 and T).
Date: 10	/31/2018	(1541444)
		Classification: Moderate
Self Report?	YES	For Informational Purposes Only
Citation:		Chapter 26, SubChapter A 26.121(a)
Description:		Chapter 305, SubChapter F 305.125(1) to meet the limit for one or more permit parameter
Date: 11	/30/2018	(1545228) Classification: Moderate
Self Report? Citation:	YES	For Informational Purposes Only Chapter 26, SubChapter A 26.121(a)
Citation.		Chapter 305, SubChapter F 305.125(1)
Description:	Failure t	o meet the limit for one or more permit parameter
Date: 01	/11/2019	(1500318) Classification: Moderate
Self Report?	NO	For Informational Purposes Only
Citation:	30 TAC (	Chapter 106, SubChapter S 106.433(8)(B) Chapter 122, SubChapter B 122.143(4) C Chapter 382 382.085(b)
Description:		o maintain complete records of the actual hours of operation of each or stripping operation.
	seating	Classification: Moderate
Self Report?	NO	For Informational Purposes Only
Citation:		Chapter 106, SubChapter T 106.452(2)(A) C Chapter 382 382.085(b)
		Page 29

	STC 16 OP
Description:	Failure to conduct outside blast cleaning at an abrasive usage rate that does not exceed one ton per day. Specifically, INVISTA used 1.53 tons of blast material on May 2, 2017 during outside abrasive blast cleaning operations. Classification: Moderate
Self Report?	NO For Informational Purposes Only
Citation:	30 TAC Chapter 101, SubChapter A 101.20(3) 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) SC 38(A)(1) PERMIT STC 14 OP STC 16 OP
Description:	Failure to inspect any fan and verify proper operation and inspect the capture system to verify there are no cracks, holes, tears, and other defects once a year. Classification: Moderate
Self Report?	NO For Informational Purposes Only
Citation:	30 TAC Chapter 101, SubChapter A 101.20(3) 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) SC 8(E) PERMIT STC 16 OP
Description:	Failure to equip each open-ended valve or line (OEL) with an appropriately sized cap, blind flange, plug, or a second valve to seal the line. Classification: Moderate
Self Report?	NO For Informational Purposes Only
Citation:	30 TAC Chapter 122, SubChapter B 122.143(4) 5C THSC Chapter 382 382.085(b) STC 15 OP
Description:	Failure to conduct and record visible emission observations once per calendar quarter.
	Classification: Moderate
Self Report? Citation:	NO For Informational Purposes Only 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) GTCs OP
•	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)
Citation: Description:	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) GTCs OP
Citation: Description:	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) GTCs OP Failure to report all instances of deviations.
Citation: Description:	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) GTCs OP Failure to report all instances of deviations. /04/2019 (1540328)
Citation: Description: Date: 02,	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) GTCs OP Failure to report all instances of deviations. /04/2019 (1540328) Classification: Moderate
Citation: Description: Date: 02, Self Report?	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) GTCs OP Failure to report all instances of deviations. /04/2019 (1540328) Classification: Moderate NO For Informational Purposes Only 30 TAC Chapter 101, SubChapter A 101.20(3) 30 TAC Chapter 116, SubChapter B 116.115(b)(2)(F) 30 TAC Chapter 116, SubChapter B 116.115(c) 5C THSC Chapter 382 382.085(b)
Citation: Description: Date: 02, Self Report? Citation: Description:	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) GTCs OP Failure to report all instances of deviations. /04/2019 (1540328) Classification: Moderate NO For Informational Purposes Only 30 TAC Chapter 101, SubChapter A 101.20(3) 30 TAC Chapter 116, SubChapter B 116.115(b)(2)(F) 30 TAC Chapter 116, SubChapter B 116.115(c) 5C THSC Chapter 382 382.085(b) PSDTX1416, Special Condition 1 PERMIT Failure to prevent unauthorized emissions during an emissions event that
Citation: Description: Date: 02, Self Report? Citation: Description:	30 TAC Chapter 122, SubChapter B 122.143(4) 30 TAC Chapter 122, SubChapter B 122.145(2) SC THSC Chapter 382 382.085(b) GTCs OP Failure to report all instances of deviations. /04/2019 (1540328) Classification: Moderate NO For Informational Purposes Only 30 TAC Chapter 101, SubChapter A 101.20(3) 30 TAC Chapter 116, SubChapter B 116.115(b)(2)(F) 30 TAC Chapter 116, SubChapter B 116.115(c) SC THSC Chapter 382 382.085(b) PSDTX1416, Special Condition 1 PERMIT Failure to prevent unauthorized emissions during an emissions event that occurred on September 14, 2018; TCEQ/STEERS Incident No. 292168. /19/2019 (1557608) Classification: Moderate
Citation: Description: Date: 02, Self Report? Citation: Description:	30 TAC Chapter 122, SubChapter B 122.143(4) 30 TAC Chapter 122, SubChapter B 122.145(2) SC THSC Chapter 382 382.085(b) GTCs OP Failure to report all instances of deviations. /04/2019 (1540328) Classification: Moderate NO For Informational Purposes Only 30 TAC Chapter 101, SubChapter A 101.20(3) 30 TAC Chapter 116, SubChapter B 116.115(b)(2)(F) 30 TAC Chapter 116, SubChapter B 116.115(c) SC THSC Chapter 382 382.085(b) PSDTX1416, Special Condition 1 PERMIT Failure to prevent unauthorized emissions during an emissions event that occurred on September 14, 2018; TCEQ/STEERS Incident No. 292168. /19/2019 (1557608) Classification: Moderate NO For Informational Purposes Only
Citation: Description: Date: 02, Self Report? Citation: Description: Date: 06,	30 TAC Chapter 122, SubChapter B 122.143(4) 30 TAC Chapter 122, SubChapter B 122.145(2) SC THSC Chapter 382 382.085(b) GTCs OP Failure to report all instances of deviations. /04/2019 (1540328) Classification: Moderate NO For Informational Purposes Only 30 TAC Chapter 101, SubChapter A 101.20(3) 30 TAC Chapter 116, SubChapter B 116.115(b)(2)(F) 30 TAC Chapter 116, SubChapter B 116.115(c) SC THSC Chapter 382 382.085(b) PSDTX1416, Special Condition 1 PERMIT Failure to prevent unauthorized emissions during an emissions event that occurred on September 14, 2018; TCEQ/STEERS Incident No. 292168. /19/2019 (1557608) Classification: Moderate NO For Informational Purposes Only 30 TAC Chapter 101, SubChapter F 101.201(e)
Citation: Description: Date: 02, Self Report? Citation: Description: Date: 06, Self Report?	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) GTCs OP Failure to report all instances of deviations. /04/2019 (1540328) Classification: Moderate NO For Informational Purposes Only 30 TAC Chapter 101, SubChapter A 101.20(3) 30 TAC Chapter 116, SubChapter B 116.115(b)(2)(F) 30 TAC Chapter 116, SubChapter B 116.115(c) 5C THSC Chapter 382 382.085(b) PSDTX1416, Special Condition 1 PERMIT Failure to prevent unauthorized emissions during an emissions event that occurred on September 14, 2018; TCEQ/STEERS Incident No. 292168. /19/2019 (1557608) Classification: Moderate NO For Informational Purposes Only 30 TAC Chapter 101, SubChapter F 101.201(e) 30 TAC Chapter 101, SubChapter F 101.222(d)(1) 5C THSC Chapter 382 382.085(b)
Citation: Description: Date: 02, Self Report? Citation: Description: Date: 06, Self Report?	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) GTCs OP Failure to report all instances of deviations. /04/2019 (1540328) Classification: Moderate NO For Informational Purposes Only 30 TAC Chapter 101, SubChapter A 101.20(3) 30 TAC Chapter 116, SubChapter B 116.115(b)(2)(F) 30 TAC Chapter 116, SubChapter B 116.115(c) 5C THSC Chapter 382 382.085(b) PSDTX1416, Special Condition 1 PERMIT Failure to prevent unauthorized emissions during an emissions event that occurred on September 14, 2018; TCEQ/STEERS Incident No. 292168. /19/2019 (1557608) Classification: Moderate NO For Informational Purposes Only 30 TAC Chapter 101, SubChapter F 101.201(e) 30 TAC Chapter 101, SubChapter F 101.222(d)(1)
Citation: Description: Date: 02, Self Report? Citation: Description: Date: 06, Self Report? 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) GTCs OP Failure to report all instances of deviations. /04/2019 (1540328) Classification: Moderate NO For Informational Purposes Only 30 TAC Chapter 101, SubChapter A 101.20(3) 30 TAC Chapter 116, SubChapter B 116.115(b)(2)(F) 30 TAC Chapter 116, SubChapter B 116.115(c) 5C THSC Chapter 382 382.085(b) PSDTX1416, Special Condition 1 PERMIT Failure to prevent unauthorized emissions during an emissions event that occurred on September 14, 2018; TCEQ/STEERS Incident No. 292168. /19/2019 (1557608) Classification: Moderate NO For Informational Purposes Only 30 TAC Chapter 101, SubChapter F 101.201(e) 30 TAC Chapter 101, SubChapter F 101.222(d)(1) 5C THSC Chapter 382 382.085(b) Failure to notify the TCEQ Corpus Christi Region Office of an excess opacity event within 24 hours after the discovery of the event. Classification: Moderate
Citation: Description: Date: 02, Self Report? Citation: Description: Date: 06, Self Report? Citation: Description:	30 TAC Chapter 122, SubChapter B 122.143(4) 30 TAC Chapter 122, SubChapter B 122.145(2) SC THSC Chapter 382 382.085(b) GTCs OP Failure to report all instances of deviations. /04/2019 (1540328) Classification: Moderate NO For Informational Purposes Only 30 TAC Chapter 101, SubChapter A 101.20(3) 30 TAC Chapter 116, SubChapter B 116.115(b)(2)(F) 30 TAC Chapter 116, SubChapter B 116.115(c) SC THSC Chapter 382 382.085(b) PSDTX1416, Special Condition 1 PERMIT Failure to prevent unauthorized emissions during an emissions event that occurred on September 14, 2018; TCEQ/STEERS Incident No. 292168. /19/2019 (1557608) Classification: Moderate NO For Informational Purposes Only 30 TAC Chapter 101, SubChapter F 101.201(e) 30 TAC Chapter 101, SubChapter F 101.222(d)(1) SC THSC Chapter 382 382.085(b) Failure to notify the TCEQ Corpus Christi Region Office of an excess opacity event within 24 hours after the discovery of the event Classification: Moderate NO For Informational Purposes Only 30 TAC Chapter 116, SubChapter B 116.115(c) SC THSC Chapter 116, SubChapter B 116.115(c) SC THSC Chapter 116, SubChapter B 116.115(c) SC THSC Chapter 382 382.085(b)
Citation: Description: Date: 02, Self Report? Citation: Description: Date: 06, Self Report? Citation: Description: Self Report?	30 TAC Chapter 122, SubChapter B 122.143(4) 30 TAC Chapter 122, SubChapter B 122.145(2) SC THSC Chapter 382 382.085(b) GTCs OP Failure to report all instances of deviations. /04/2019 (1540328) Classification: Moderate NO For Informational Purposes Only 30 TAC Chapter 101, SubChapter A 101.20(3) 30 TAC Chapter 116, SubChapter B 116.115(b)(2)(F) 30 TAC Chapter 116, SubChapter B 116.115(c) SC THSC Chapter 382 382.085(b) PSDTX1416, Special Condition 1 PERMIT Failure to prevent unauthorized emissions during an emissions event that occurred on September 14, 2018; TCEQ/STEERS Incident No. 292168. /19/2019 (1557608) Classification: Moderate NO For Informational Purposes Only 30 TAC Chapter 101, SubChapter F 101.201(e) 30 TAC Chapter 101, SubChapter F 101.22(d)(1) SC THSC Chapter 382 382.085(b) Failure to notify the TCEQ Corpus Christi Region Office of an excess opacity event within 24 hours after the discovery of the event. Classification: Moderate NO For Informational Purposes Only 30 TAC Chapter 101, SubChapter F 101.222(d)(1) SC THSC Chapter 382 382.085(b) Failure to notify the TCEQ Corpus Christi Region Office of an excess opacity event within 24 hours after the discovery of the event. Classification: Moderate NO For Informational Purposes Only 30 TAC Chapter 116, SubChapter B 116.115(c)

Date: 06/26/2019 (1571573)Classification: Moderate For Informational Purposes Only NO Self Report? 30 TAC Chapter 305, SubChapter F 305.125 Citation: 30 TAC Chapter 331, SubChapter D 331.64(d) 40 CFR Chapter 146, SubChapter D, PT 146, SubPT G 146.67(f) WDW029 PP.VIII. MONITORING AND TESTING PERMIT Description: Failed to install, use, and maintain in proper operating condition at all times, continuous recording devices to record injection tubing pressures, injection flow rates, injection fluid temperatures, injection volumes, tubing-long string casing annulus pressure and volume, and any other data specified by the permit. Date: 07/31/2019 (1599484)Moderate Classification: For Informational Purposes Only Self Report? YES 2D TWC Chapter 26, SubChapter A 26.121(a) Citation: 30 TAC Chapter 305, SubChapter F 305.125(1) Description: Failure to meet the limit for one or more permit parameter Date: 08/05/2019 (1578969)Classification: Moderate For Informational Purposes Only Self Report? NO 30 TAC Chapter 335, SubChapter C 335.69(a) Citation: 40 CFR Chapter 262, SubChapter I, PT 262, SubPT C 262.34(a) Failed to obtain a permit, interim status or other authorization prior to Description: accumulating hazardous waste for more than 90 days. Classification: Moderate For Informational Purposes Only Self Report? NO 30 TAC Chapter 335, SubChapter C 335.69(d)(1) Citation: 40 CFR Chapter 262, SubChapter I, PT 262, SubPT C 262.34(c)(1)(i) 40 CFR Chapter 265, SubChapter I, PT 265, SubPT I 265.171 Failed to ensure a container holding a hazardous waste (e.g., severe rusting, Description: apparent structural defects) is in good condition. Classification: Moderate NO For Informational Purposes Only Self Report? 30 TAC Chapter 335, SubChapter C 335.69(a)(1)(A) Citation: 30 TAC Chapter 335, SubChapter E 335.112(a)(8) 40 CFR Chapter 262, SubChapter I, PT 262, SubPT C 262.34(a)(1)(i) 40 CFR Chapter 265, SubChapter I, PT 265, SubPT I 265.173(a) Failed to ensure a container storing hazardous waste is always closed except Description: when it is necessary to add or remove waste. Classification: Moderate For Informational Purposes Only Self Report? NO 30 TAC Chapter 335, SubChapter C 335.69(d)(1) Citation: 40 CFR Chapter 262, SubChapter I, PT 262, SubPT C 262.34(c)(1)(i) 40 CFR Chapter 265, SubChapter I, PT 265, SubPT I 265.173(a) Description: Failed to ensure a container storing hazardous waste is always closed except when it is necessary to add or remove waste. Classification: Minor For Informational Purposes Only NO Self Report? Citation: 30 TAC Chapter 335, SubChapter C 335.69(e) 40 CFR Chapter 262, SubChapter I, PT 262, SubPT C 262.34(c)(2) Failed to ensure the container holding excess amount of hazardous waste marked Description: with the beginning date of excess accumulation. Classification: Moderate For Informational Purposes Only Self Report? NO 30 TAC Chapter 335, SubChapter C 335.69(a)(2) Citation: 40 CFR Chapter 262, SubChapter I, PT 262, SubPT C 262.34(a)(2) Description: Failed to clearly mark the date upon which each period of accumulation begins on each container. Classification: Minor For Informational Purposes Only Self Report? NO 40 CFR Chapter 279, SubChapter I, PT 279, SubPT C 279.22(c) Citation:

38

39

40

Page 31

Description:	Failed to label or clearly mark containers and aboveground storage tanks used to stored used oil at generator facilities with the words "Used Oil." Classification: Moderate
Self Report?	NO For Informational Purposes Only
Citation:	30 TAC Chapter 335, SubChapter F 335.152(a)(1)
	40 CFR Chapter 264, SubChapter I, PT 264, SubPT C 264.15(d)
	50393, PP. II.A.2. Duty to Comply PERMIT 50393, PP. III. D. Gen. Inspection Req. PERMIT
Description:	Failed to follow the inspection schedule contained in the permit application
	submittals identified in Provision I.B. and as set out in Table III.D. Inspection Schedule. Failed to maintain records of inspections as required by 40 CFR 264.15(d) and 265.15(d).
Date: 08	/23/2019 (1582081)
Date. 00	Classification: Moderate
Self Report?	NO For Informational Purposes Only
Citation:	1902 STC 22 OP
	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)
	NSR 23271 SC10 PERMIT
Description:	Failure to adequately record all of the information required by the bag filter daily inspection sheet. Specifically, Invista failed to adequately record all of the required information on two inspection forms on June 28, 2018 and July 8, 2018. Classification: Moderate
Self Report?	NO For Informational Purposes Only
Citation:	30 TAC Chapter 116, SubChapter B 116.115(c)
	30 TAC Chapter 122, SubChapter B 122.143(4)
	40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.167(a)(1) 5C THSC Chapter 382 382.085(b)
<b>D</b>	NSR 23271 SC 16E PERMIT
Description:	Failure to prevent fugitive emissions from Open Ended Lines (OEL). Specifically, Invista discovered three open ended lines on August 14, 2018, August 16, 2018, and October 2, 2018.
	Classification: Moderate
Self Report?	NO For Informational Purposes Only
Citation:	1902 STC 22 ORDER
	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)
Description	NSR 23271 SC 18 PERMIT
Description:	Failure to adequately record all of the information required by when performing ammonia (NH3) Audio, Visual and Olfactory (AVO) Inspections. Specifically, Invista failed to adequately record all of the required information during AVO
	inspections ten times from May 4, 2018 through April 25, 2019.
	Classification: Moderate
Self Report?	NO For Informational Purposes Only
Citation:	1902 STC 22 OP 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) NSR 23271 SC 24 PERMIT
Description:	Failure to comply with the requirements listed in an applicable state permit.
	Specifically, Invista failed to take a second ammonia sample within twelve hours of an ammonia exceedance in the first sample on July 10, 2018 and February 12,
	2019.
	Classification: Moderate
Self Report?	NO For Informational Purposes Only
Citation:	1902 STC 3 OP
	30 TAC Chapter 111, SubChapter A 111.111 30 TAC Chapter 122, SubChapter B 122.143(4)
Description:	Failure to conduct a quarterly visible emissions observation. Specifically, Invista
	failed to conduct the required third quarter of 2018 visible emissions observation for the RPF bag filter
	Classification: Moderate
Self Report?	NO For Informational Purposes Only
-	

Citation:	1902 STC 22 OP 30 TAC Chapter 116, SubChapter B 116.115(c) 30 TAC Chapter 122, SubChapter B 122.143(4) NSR 23271 SC 6 PERMIT
Description:	Failure to comply with the requirements listed in an applicable state permit. Specifically, Invista exceeded the emissions factor of 0.06 NOx MMBtu while firing rates were greater than 130 MM Btu for the Hydrogen Reformer Unit on July 31, 2018.
	Classification: Moderate NO For Informational Purposes Only
Self Report? Citation:	NO FOR INFORMATIONAL PURPOSES ONLY 1902 STC 22 OP
Citation	30 TAC Chapter 116, SubChapter B 116.115(c) 30 TAC Chapter 122, SubChapter B 122.143(4) NSR 23271 SC 1 PERMIT
Description:	Failure to comply with the hourly maximum fill rate requirements listed in an applicable state permit. Specifically, Invista exceeded the hourly maximum fill rate permit representations for the Big A Crude Tank twice on January 22, 2019
	and once on March 13, 2019. Classification: Moderate
Self Report?	NO For Informational Purposes Only
Citation:	1902 STC 22 OP 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)
	NSR 23271 SC 13 PERMIT
Description:	Failure to comply with the requirements listed in an applicable state permit. Specifically, Invista's HMD Rail Loading scrubber fell below 95 percent efficiency on December 28, 2018 and January 3, 2019.
	Classification: Moderate
Self Report?	NO For Informational Purposes Only
Citation:	1902 STC 6 OP 30 TAC Chapter 116, SubChapter B 116.115(c) 30 TAC Chapter 122, SubChapter B 122.143(4) 40 CFR Chapter 61, SubChapter C, PT 61, SubPT FF 61.354(a)(2) 40 CFR Chapter 61, SubChapter C, PT 61, SubPT FF 61.356(i)(5) NSR 23271 SC 4 PERMIT
Description:	Failure to comply with the requirements listed in an applicable state permit. Specifically, Invista failed to keep the make to feed ratio on the Benzene Flasher from dropping below 0.07 during a facility steam loss event on January 4, 2019. Classification: Moderate
Self Report?	NO For Informational Purposes Only
Citation:	1902 STC 22 OP 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) NSR 31376 SC 13 PERMIT
Description:	Failure to comply with the requirements listed in an applicable state permit. Specifically, Invista exceeded the Total Dissolved Solids (TDS) concentration allowable limit during the week of April 24, 2019. Classification: Moderate
Self Report?	No For Informational Purposes Only
Citation:	1902 STC 22 OP
	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) NSR 23271 SC 23 PERMIT
Description:	Failure to adequately record all of the information required by the breather pot inspection forms. Specifically, Invista failed to adequately record all of the required information on two inspection forms on January 18, 2019 and January 19, 2019.
Date: 08/	/30/2019 (1590970)
	Classification: Moderate
Self Report?	NO For Informational Purposes Only
Citation:	1904 ST&C 1A OP 30 TAC Chapter 101, SubChapter A 101.20(1) 30 TAC Chapter 113, SubChapter C 113.130 30 TAC Chapter 116, SubChapter B 116.115(c)
	Page 33

	30 TAC Chapter 122, SubChapter B 122.143(4) 40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.167(a)(2) 5C THSC Chapter 382 382.085(b) NSR 7186 SC 21F PERMIT
Description:	Failure to equip each open-ended line (OEL) with a cap, blind flange, plug, or second valve to seal the line. Specifically, Invista discovered fifteen (15) open ended lines from April 1, 2018 through March 31, 2019. Classification: Moderate
Self Report?	NO For Informational Purposes Only
Citation:	1904 ST&C 1A OP
	30 TAC Chapter 101, SubChapter A 101.20(1) 30 TAC Chapter 113, SubChapter C 113.130
	30 TAC Chapter 116, SubChapter B 116.115(c) 30 TAC Chapter 122, SubChapter B 122.143(4)
	40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.171(a)
	5C THSC Chapter 382 382.085(b) NSR 7186 SC 21J PERMIT
Description:	Failure to comply with the requirements listed in an applicable state permit. Specifically, Invista failed to repair a valve placed on Delay of Repair during a
	scheduled shutdown on March 31, 2019. Classification: Moderate
Self Report?	NO For Informational Purposes Only
Citation:	1904 ST&C 28 OP
	30 TAC Chapter 101, SubChapter A 101.20(1) 30 TAC Chapter 111, SubChapter A 111.111(a)(4)(A)
	30 TAC Chapter 113, SubChapter C 113.130 30 TAC Chapter 116, SubChapter B 116.115(c)
	30 TAC Chapter 122, SubChapter B 122.143(4)
	40 CFR Part 60, Subpart A 60.18 40 CFR Part 63, Subpart A 63.11
	5C THSC Chapter 382 382.085(b) NSR 7186 SC 8C PERMIT
Description:	Failure to operate with no visible emissions. Specifically, Invista operated the ADN
	flare with visible emissions for six minutes and fifty seconds on April 11, 2018. Visible emissions are not to exceed a total of five minutes during any two consecutive hour periods.
	Classification: Moderate
Self Report?	NO For Informational Purposes Only
Citation:	1904 ST&C 28 OP 30 TAC Chapter 101, SubChapter A 101.20(2)
	30 TAC Chapter 116, SubChapter B 116.115(c) 30 TAC Chapter 122, SubChapter B 122.143(4)
	40 CFR Chapter 61, SubChapter C, PT 61, SubPT FF 61.356(b)(4)
	5C THSC Chapter 382 382.085(b) NSR 7186 SC 4 PERMIT
Description:	Failure to adequately record all of the information required when performing quarterly Individual Drain Systems (IDS) Inspections. Specifically, Invista failed
	to identify and document water seals that had insufficient water levels and appropriately address those issues as part of the quarterly inspections required
	by 40 CFR §61.356(b)(4)(i). Classification: Moderate
Self Report?	NO For Informational Purposes Only
Citation:	1904 ST&C 1A OP
	30 TAC Chapter 111, SubChapter A 111.111 30 TAC Chapter 122, SubChapter B 122.143(4)
Description:	5C THSC Chapter 382 382.085(b) Failure to adequately record all of the information required when performing a
Description	quarterly Method 9 visible emissions observation. Specifically, Invista to record all
	of the information required on the Method 9 visible emissions observation form for the second quarter of 2018.
	Classification: Moderate
Self Report? Citation:	NO For Informational Purposes Only 1904 ST&C 1A OP
citation	30 TAC Chapter 111, SubChapter A 111.111(a)(4)(A)(ii)
	30 TAC Chapter 122, SubChapter B 122.143(4)
Description	5C THSC Chapter 382 382.085(b) Failure to perform daily visible emissions observations. Specifically, Invista failed
Description:	Failure to perform daily visible emissions observations. Specifically, Invista failed to perform daily visible emissions observations while the Cold NH3 flare was in
Description:	Failure to perform daily visible emissions observations. Specifically, Invista failed

Date:	08/30/2019	(1557529)	Classific	ation	Moderate
Self Repo Citation:	30 TAC ( 30 TAC ( 5C THSC	Chapter 116, SubCha Chapter 122, SubCha C Chapter 382 382.08 .0, 14 OP OP OP	ational Purpo pter B 116.115(c) pter B 122.143(4)		
Descriptio			te (Invista) failed to al 3 and STC 25 of NSR 8 Classific	812.	pecial term and Moderate
Self Repo	30 TAC 30 TAC 40 CFR (	Chapter 116, SubCha Chapter 122, SubChap Chapter 63, SubChap C Chapter 382 382.08 7 OP & 14 OP ) OP ) OP OP C) OP	pter B 122.143(4) ter C, PT 63, SubPT EE		<i>*</i>
Descriptio		ailed to comply with I		ation:	Moderate
Self Repo	30 TAC ( 30 TAC ( 30 TAC ( 30 TAC ( 30 TAC ( 5C THSC	Chapter 101, SubCha Chapter 111, SubCha Chapter 116, SubCha Chapter 122, SubCha C Chapter 382 382.08 .0, 14 OP OP OP	pter A 111.111(a)(1)(l pter B 116.110(a) pter B 122.143(4)		Dnly
Descriptio	period fo combine	or the combined stack	d opacity limit of 20% for boilers 3 and 4 (E and 8 (EPN 17STK-007 t occasions. Classific	PN 15STk ') as requ	<-006), and the
Self Repo	30 TAC 30 TAC 5C THSC GTC 1, 1 GTC 0P STC 15	Chapter 116, SubCha Chapter 122, SubCha C Chapter 382 382.08 .0, 14 OP OP	ational Purpo pter B 116.115(c) pter B 122.143(4)		
Descriptio	(SCFH)	ailed to maintain a m of supplemental natu	inimum flow of 2,350 s al gas flow to the ring D1A) on two occasions. Classific	burner o	
Self Repo Citation:	30 TAC ( 30 TAC ( 5C THSC	Chapter 117, SubCha Chapter 122, SubCha C Chapter 382 382.08 3, 10, 14 OP P	ational Purpo pter F 117.4205 pter B 122.143(4)		
Descriptio		ailed to abide by 30 1	AC §117.4205. Classific	ation:	Moderate

Self Report?	NO For Informational Purposes Only
Citation:	30 TAC Chapter 122, SubChapter B 122.143(4) 5C THSC Chapter 382 382.085(b) GTC 1, 8, 10, 14 OP
	GTC OP STC 1 OP
	STC 15 OP
Description:	Invista failed to abide by their maximum allowable emissions rate (MAERT) for NOx as listed in NSR 809's MAERT table for the ammonia oxidation process (AOP) main stack (EPN 14STK-001).
Self Report?	Classification: Moderate NO For Informational Purposes Only
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) GTC 1, 7, 10, 14 OP GTC OP STC 12(B) OP STC 13 OP
Description:	Invista failed to maintain records of continuous water flow to the hydrochloric acid (HCL) scrubber at least once per day when the HCL tank is in service. Classification: Moderate
Self Report?	NO For Informational Purposes Only
Citation:	30 TAC Chapter 116, SubChapter B 116.115(b)(2)(F) 30 TAC Chapter 122, SubChapter B 122.143(4) 5C THSC Chapter 382 382.085(b) GTC 1, 8, 10, 14 OP
	GTC OP STC 1 OP
Description:	STC 15 OP Invista failed to abide by its MAERT limit of 4998.11 lbs/hour NOx regarding the
	catalytic abater unit (EPN 1SCAT-001). Classification: Moderate
Self Report?	NO For Informational Purposes Only
Citation:	30 TAC Chapter 116, SubChapter B 116.115(c) 30 TAC Chapter 122, SubChapter B 122.143(4)
	40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.167(a)(1) 5C THSC Chapter 382 382.085(b) GTC 1, 9, 10, 14 OP
	GTC OP STC 12(E) OP STC 15 OP
Description:	Invista failed to meet the open-needed line (OEL) requirements outlined in NSR 813, STC 12 (E).
	Classification: Moderate
Self Report? Citation:	NO For Informational Purposes Only 30 TAC Chapter 101, SubChapter F 101.201
	30 TAC Chapter 116, SubChapter B 116.115(c) 30 TAC Chapter 122, SubChapter B 122.143(4)
	40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.168(b) 5C THSC Chapter 382 382.085(b)
	GTC 1, 9 ,10, 14 OP GTC OP
	STC 12(F) OP STC 16 OP
Description:	Invista failed to monitor a valve that was placed back into volatile organic compounds (VOC) service on nine occasions. Classification: Moderate
Self Report?	NO For Informational Purposes Only
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) GTC 1, 9, 10, 14 OP GTC OP
	STC 15 OP STC 9 OP
Description:	Invista failed to abide by time requirements for planned continuous emissions monitoring system (CEMS) maintenance outlined within NSR 812.

	Classification: Moderate
Self Report? Citation:	NO For Informational Purposes Only 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 D 60.44 5C THSC Chapter 382 382.085(b) GTC 1, 10, 14 OP GTC OP STC 15 OP STC 15 OP STC 5(A) OP
Description:	Invista failed to abide by NOx emissions limits required by 40 CFR 60.44. Classification: Moderate
Self Report? Citation:	NO For Informational Purposes Only 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) GTC OP STC 14 OP
Description:	Invista failed to report all instances of deviations. Classification: Moderate
Self Report?	NO For Informational Purposes Only
Citation:	30 TAC Chapter 116, SubChapter B 116.115(c) 30 TAC Chapter 122, SubChapter B 122.143(4) 40 CFR Chapter 63, SubChapter C, PT 63, SubPT A 63.10(b) 40 CFR Chapter 63, SubChapter C, PT 63, SubPT A 63.10(c) 40 CFR Chapter 63, SubChapter C, PT 63, SubPT EEE 63.1200 40 CFR Chapter 63, SubChapter C, PT 63, SubPT EEE 63.1211(b) 40 CFR Chapter 63, SubChapter C, PT 63, SubPT EEE 63.1217(a)(5)(i) GTC 1, 7, 10, 14 OP GTC OP STC 15 OP STC 5(C)(5) OP
Description:	Invista Failed to abide by the CO hourly rolling average emissions concentration for start-up activities and reporting/recording requirements. Classification: Moderate
Self Report? Citation:	NO For Informational Purposes Only 30 TAC Chapter 111, SubChapter A 111.111(a)(1)(E) 30 TAC Chapter 116, SubChapter B 116.115(c) 30 TAC Chapter 122, SubChapter B 122.143(4) 30 TAC Chapter 122, SubChapter B 122.144(1) GTC 1, 7, 10 OP GTC OP STC 12 OP STC 13 OP STC 3 OP
Description:	Invista failed to maintain monitoring records
Date: 08/	31/2019 (1606389) Classification: Moderate
Self Report? Citation: Description:	YES For Informational Purposes Only 2D TWC Chapter 26, SubChapter A 26.121(a) 30 TAC Chapter 305, SubChapter F 305.125(1) Failure to meet the limit for one or more permit parameter
Date: 10/	31/2019 (1619049)
Self Report? Citation: Description:	Classification:       Moderate         YES       For Informational Purposes Only         2D TWC Chapter 26, SubChapter A 26.121(a)       30 TAC Chapter 305, SubChapter F 305.125(1)         Failure to meet the limit for one or more permit parameter
Date: 12/	31/2019 (1634042) Classification: Moderate
Self Report? Citation:	YES For Informational Purposes Only 2D TWC Chapter 26, SubChapter A 26.121(a) 30 TAC Chapter 305, SubChapter F 305.125(1)

45\*

46\*

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

				F F	
47*	Date: 01,	/03/2020	(1605279)	Classification: Moderate	
	Self Report?	NO	For Informational	Purposes Only	
	Citation:		Chapter 305, SubChapter F 305. Chapter 305, SubChapter F 305.	125(1)	
			nal Requirements No. 1, Pg. 13		
	Description:	treatmer	ensure at all times that the faci nt, and disposal are operated and maintained.	lity and all of its systems of collection,	
48*	Date: 04,	/30/2020	(1660104)	Classification: Moderate	
	Self Report?	YES	For Informational	Purposes Only	
	Citation:		Chapter 26, SubChapter A 26.1. Chapter 305, SubChapter F 305.		
	Description:		o meet the limit for one or more		
	·				
49*	Date: 05/	/29/2020	(1644596)		
				Classification: Moderate	
	Self Report?	NO	For Informational		
	Citation:		Chapter 116, SubChapter B 116. Chapter 122, SubChapter B 122.		
		5C THSC	Chapter 382 382.085(b)		
		GTC OP SC 7C PE	RMIT		
		STC 15 (	)P		
	Description:	STC 4E (		s for planned continuous emissions	
	Description.	i anare a	s comply with time requirement		
		monitori	ng system (CEMS) maintenance	Classification: Moderate	
	Self Report?	NO	For Informational	Purposes Only	
	Citation:		Chapter 111, SubChapter A 111.		
			Chapter 116, SubChapter B 116. Chapter 116, SubChapter B 116.		
		30 TAC (	Chapter 122, SubChapter B 122.		
		GTC OP	Chapter 382 382.085(b)		
		SC 3 PA	MIT		
		SC 3 PEF STC 15 (			
	<b>D</b>	STC 1A (			
	Description:	period.	o maintain opacity from a vent b	below 20% averaged over a six-minute	
				Classification: Moderate	
	Self Report?	NO	For Informational	Purposes Only	
	Citation:		Chapter 116, SubChapter B 116.		
			Chapter 117, SubChapter F 117. Chapter 122, SubChapter B 122.		
		5C THSC GTC OP	Chapter 382 382.085(b)		
		SC 1 PEF	RMIT		
		STC 15 (			
	Description:	STC 1A ( Failure to		emissions of nitrogen oxides (NOx)	
			00 parts per million by volume.		
	<b>a</b> 16 -		Ear Informational	Classification: Moderate	
	Self Report?		For Informational		
	Citation:		Chapter 116, SubChapter B 116. Chapter 116, SubChapter B 116.		
		30 TAC (	Chapter 117, SubChapter F 117.	4205	
			Chapter 122, SubChapter B 122. Chapter 382 382.085(b)	143(4)	
		GTC OP			
		SC 1 PEF STC 15 (			
			-		

Description:	Failure to comply with the hourly NOx rate of the Maximum Allowable Emission Rates Table (MAERT) of NSR 809. Classification: Moderate
Self Report? Citation:	NO For Informational Purposes Only 30 TAC Chapter 113, SubChapter C 113.620 30 TAC Chapter 116, SubChapter B 116.115(b) 30 TAC Chapter 116, SubChapter B 116.115(c) 30 TAC Chapter 122, SubChapter B 122.143(4) 30 TAC Chapter 122, SubChapter C, PT 63, SubPT EEE 63.1206(c)(3)(vii) 5C THSC Chapter 382 382.085(b) GTC OP SC 5C4 PERMIT SC 5C5 PERMIT STC 15 OP STC 14 OP STC 1E OP
Description:	Failure to comply with 40 CFR Part 63, Subpart EEE. Classification: Moderate
Self Report? Citation:	NO For Informational Purposes Only 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) GTC OP SC 6 PERMIT STC 15 OP
Description:	Failure to comply with special conditions of NSR 9560. Classification: Moderate
Self Report? Citation:	NO For Informational Purposes Only 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) GTC OP SC 5B PERMIT STC 15 OP
Description:	Failure to comply with special conditions of NSR 9560. Classification: Moderate
Self Report? Citation:	NO For Informational Purposes Only 30 TAC Chapter 116, SubChapter B 116.115(b) 30 TAC Chapter 116, SubChapter B 116.115(c) 30 TAC Chapter 122, SubChapter B 122.143(4) 30 TAC Chapter 122, SubChapter B 122.143(6) 40 CFR Chapter 63, SubChapter C, PT 63, SubPT EEE 63.1211(b) 5C THSC Chapter 382 382.085(b) GTC OP
	SC 5C4 PERMIT STC 15 OP STC 1E OP
Description:	Failure to comply with 40 CFR Part 63, Subpart EEE. Classification: Moderate
Self Report? Citation:	NO For Informational Purposes Only 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) GTC OP SC 1 PERMIT STC 15 OP
Description:	Failure to comply with the Maintenance, StartUp, and Shutdown Operations (MSS) hourly NH3 rate of MAERT of NSR 809. Classification: Moderate
Self Report? Citation:	NO For Informational Purposes Only 30 TAC Chapter 116, SubChapter B 116.115(c) 30 TAC Chapter 122, SubChapter B 122.143(4) 40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.167(a)(1) 5C THSC Chapter 382 382.085(b) GTC OP SC 12E PERMIT

Description:	STC 15 OP Failure to meet open-ended line (OEL) requirements. Specifically, Invista discovered five (5) OELs during the period. See DR1, deviation item number 16 and DR2, deviation item number 17. Classification: Moderate
Self Report? Citation:	NO For Informational Purposes Only 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) GTC OP SC 11F PERMIT SC 12F PERMIT STC 15 OP
Description:	Failure to monitor all valves quarterly for fugitive emissions with approved gas analyzer. Classification: Moderate
Self Report?	No For Informational Purposes Only
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) GTC OP SC 11 PERMIT STC 15 OP
Description:	Failure to comply with special conditions of NSR 813. Classification: Moderate
Self Report?	NO For Informational Purposes Only
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 60.13 5C THSC Chapter 382 382.085(b) GTC OP SC 9 PERMIT STC 15 OP STC 4E OP
Description:	Failure to meet quarterly monitoring requirement for continuous emissions monitoring system (CEMS) testing. Classification: Moderate
Self Report?	No For Informational Purposes Only
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) GTC OP SC 7C PERMIT STC 15 OP STC 4E OP
Description:	Failure to meet hourly monitoring requirement for continuous demonstration of compliance. Classification: Moderate
Self Report?	NO For Informational Purposes Only
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) GTC OP SC 1 PERMIT
Description:	STC 15 OP Failure to comply with the hourly N2O rate of the MAERT of NSR 812.
Date: 08/	17/2020 (1659535) Classification: Moderate
Self Report?	No For Informational Purposes Only
Citation:	40 CFR Chapter 63, SubChapter C, PT 63, SubPT ZZZZ 63.6640 5C THSC Chapter 382 382.085(b)
Description:	FOP O-01902, Special Term & Condition 1 OP Failure to comply with time limit usage of emergency engines. Classification: Moderate
Self Report?	No For Informational Purposes Only
	Page 40

50\*

Citation:	30 TAC Chapter 122, SubChapter B 122.143(4) 40 CFR Chapter 82, SubChapter C, PT 82, SubPT F 82.161(a)(1) 5C THSC Chapter 382 382.085(b)
Description:	Failure to comply with certification requirements for operating Relief Valves (RVs). Classification: Moderate
Self Report?	NO For Informational Purposes Only
Citation:	30 TAC Chapter 101, SubChapter A 101.20(1) 30 TAC Chapter 113, SubChapter C 113.100 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 VV 60.482-6(a)(1) 40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.167(a)(1) 5C THSC Chapter 382 382.085(b) FOP 0-01902, Special Term & Condition 22 OP NSR 23271/PSDTX1416/PSDTX1079M2, SC 16E PERMIT
Description:	Failure to prevent open-ended lines.
	Classification: Moderate
Self Report? Citation:	NO For Informational Purposes Only 30 TAC Chapter 101, SubChapter A 101.20(3)
	30 TAC Chapter 116, SubChapter B 116.111 30 TAC Chapter 116, SubChapter B 116.111 30 TAC Chapter 122, SubChapter B 122.143(4) 30 TAC Chapter 122, SubChapter B 122.144(1) 5C THSC Chapter 382 382.085(b) FOP O-01902, General Terms & Conditions OP FOP O-01902, Special Term & Condition 22 OP NSR 23271/PSDTX1416/PSDTX1079M2, SC 11D PERMIT NSR 23271/PSDTX1416/PSDTX1079M2, SC 18A PERMIT NSR 23271/PSDTX1416/PSDTX1079M2, SC 23 PERMIT NSR 23271/PSDTX1416/PSDTX1079M2, SC 7 PERMIT NSR 23271/PSDTX1416/PSDTX1079M2, SC 7 PERMIT NSR 31376, SC 18 PERMIT
Description:	Failure to maintain records as required by applicable state permit requirements. Classification: Moderate
Self Report?	NO For Informational Purposes Only
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 O-01902, Special Term & Condition 22 OP NSR 31376, SC 10 PERMIT
Description:	Failure to conduct wastewater testing on a quarterly basis as required by the applicable state permit
	Classification: Moderate
Self Report? Citation:	NO For Informational Purposes Only 30 TAC Chapter 101, SubChapter A 101.20(3) 30 TAC Chapter 116, SubChapter B 116.110(e)(2) 30 TAC Chapter 116, SubChapter B 116.115(b) 30 TAC Chapter 122, SubChapter B 122.143(4) 5C THSC Chapter 382 382.085(b) FOP O-01902, Special Term & Condition 22 OP NSR 23271/PSDTX1416/PSDTX1079M2, GT&C 1 PERMIT
Description:	Failure to operate as represented. Classification: Moderate
Self Report?	No For Informational Purposes Only
Citation:	30 TAC Chapter 101, SubChapter A 101.20(3) 30 TAC Chapter 111, SubChapter A 111.111(a)(1)(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 O-01902, Special Term & Condition 3A OP NSR 23271/PSDTX1416/PSDTX1079M2, SC 3 PERMIT
Description:	Failure to conduct quarterly Method 9 observations.
Date: 08/	20/2020 (1658179) Classification: Moderate
Self Report?	NO For Informational Purposes Only
Citation:	2D TWC Chapter 26, SubChapter A 26.121(a)(1) 30 TAC Chapter 305, SubChapter F 305.125(1) Permit Conditions; No. 2g, Pg. 7 PERMIT

51\*

Description: Failed to prevent an unauthorized discharge of wastewater or any other waste.

	Description	railed to prevent an analationzed discharge of wastewater of any other waster
52*	Date: 08	25/2020 (1657948)
		Classification: Moderate
	Self Report?	NO For Informational Purposes Only
	Citation:	1904 ST&C 1A OP 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) 7186, SC 11 PERMIT
	Description:	Failure to comply with the requirements listed in an applicable state permit.
		Specifically, on April 3, 2019 Invista loaded crude cresol into a tank trailer that had an expired Department of Transportation (DOT) leak tight check and annual
		DOT Certification.
		Classification: Moderate
	Self Report?	NO For Informational Purposes Only
	Citation:	1904 ST&C 1A OP 30 TAC Chapter 116, SubChapter B 116.115(c)
		30 TAC Chapter 122, SubChapter B 122.143(4)
		40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.169(c)(1) 5C THSC Chapter 382 382.085(b)
	Description:	Failure to comply with the requirements listed in an applicable state permit.
		Specifically, Invista failed to repair a pump within the fifteen-day regulatory timeframe. The pump was found leaking on April 11, 2019 but was not placed on
		Delay of Repair until June 10, 2019.
		Classification: Moderate
	Self Report? Citation:	NO For Informational Purposes Only 1904 ST&C 28 OP
	Citation.	30 TAC Chapter 116, SubChapter B 116.115(c)
		30 TAC Chapter 122, SubChapter B 122.143(4) 40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.167(a)(2)
		5C THSC Chapter 382 382.085(b)
	Description	7186, SC 21F PERMIT Failure to equip each open-ended line (OEL) with a cap, blind flange, plug, or
	Description:	second valve to seal the line. Specifically, Invista discovered thirty-four (34) open
		ended lines from April 1, 2019 through March 31, 2020. Classification: Moderate
	Self Report?	No For Informational Purposes Only
	Citation:	1904 ST&C 1A OP
		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)
	Description:	Failure to perform visible emissions observations. Specifically, Invista failed to
		perform visible emissions observations five (5) times from May 22, 2019 through June 3, 2019 for the Butadiene Flare and the Cold NH3 Flare.
		Classification: Moderate
	Self Report?	NO For Informational Purposes Only
	Citation:	1904 ST&C 1 OP 30 TAC Chapter 116, SubChapter B 116.115(c)
		30 TAC Chapter 122, SubChapter B 122.143(4)
		40 CFR Part 63, Subpart H 63.166 5C THSC Chapter 382 382.085(b)
		7186, SC 1 PERMIT
	Description:	Failure to send purged liquids from a sample station to a closed-purge, closed-loop, or closed-vent system. Specifically, Invista's ADN column tails
		sample station drain was plugged which sent purged liquids from the ADN column
		tail sample station to their slab and open trench areas. Classification: Moderate
	Self Report?	NO For Informational Purposes Only
	Citation:	1904 ST&C 28 OP
		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)
	Dec. 1.11	7186, SC 1 PERMIT
	Description:	Failure to comply with the requirements listed in an applicable state permit. Specifically, Invista exceeded the 12-month rolling throughput from April 1, 2019
		through September 30, 2019 for the PN Seal Flush Tank.
		Classification: Moderate

Self Report?	NO For Informational Purposes Only
Citation:	1904 ST&C 28 OP 30 TAC Chapter 101, SubChapter F 101.201
	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) 7186, SC 1 PERMIT
Description:	Failure to notify the TCEQ Corpus Christi Region Office of a reportable emissions
2 000. pt.o	event within 24 hours after the discovery of the event. Specifically, an emissions
	event, Texas Commission on Environmental Quality (TCEQ)/State of Texas
	Environmental Electronic Reporting System (STEERS) Incident No. 325563, was discovered on November 22, 2019 at 0542 hours; however, Invista reported the
	event to the TCEQ Region Office on November 26, 2019 at 0311 hours which was
	four days after the 24-hour deadli
Date: 08/	/28/2020 (1624119)
	Classification: Moderate
Self Report?	NO For Informational Purposes Only
Citation:	30 TAC Chapter 101, SubChapter A 101.20(3)
	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)
	PSDTX 1448, SC 8(E) PERMIT
	ST&C 16 OP
Description:	Failure to equip each open-ended valve or line (OEL) with an appropriately sized
	cap, blind flange, plug, or a second valve to seal the line. Classification: Moderate
Self Report?	NO For Informational Purposes Only
Citation:	30 TAC Chapter 101, SubChapter A 101.20(3)
	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) PSDTX 1448, SC 16 PERMIT
	ST&C 16 OP
Description:	Failure to maintain valid data of differential pressure across the No. 4 Dryer Bag
	Filter baghouse for at least 95 percent of the time that the baghouse operated over the previous rolling 12-month period.
	Classification: Moderate
Self Report?	NO For Informational Purposes Only
Citation:	30 TAC Chapter 101, SubChapter A 101.20(3)
	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)
	PSDTX 1448, SC 8(F) PERMIT
Description:	ST&C 16 OP Failure to re-monitor the replacement for a leaking component within 15 days of
Description	being placed back into volatile organic compound (VOC) service.
	Classification: Moderate
Self Report?	NO For Informational Purposes Only
Citation:	30 TAC Chapter 122, SubChapter B 122.143(4)
	5C THSC Chapter 382 382.058(b) ST&C 15 OP
Description:	Failure to conduct visible emissions observations once per calendar quarter.
	Classification: Moderate
Self Report?	NO For Informational Purposes Only
Citation:	30 TAC Chapter 101, SubChapter F 101.201(b)
	30 TAC Chapter 122, SubChapter B 122.143(4) 5C THSC Chapter 382 382.085(b)
	ST&C 2(F) OP
Description:	Failure to create complete final records of all non-reportable (recordable)
	emissions events as soon as practicable but no later than two weeks after the end of the emissions events.
	Classification: Moderate
Self Report?	NO For Informational Purposes Only
Citation:	30 TAC Chapter 101, SubChapter A 101.20(3)
	30 TAC Chapter 116, SubChapter B 116.115(b)(2)(F)
	30 TAC Chapter 116, SubChapter B 116.115(c)
	Page 43

	30 TAC Chapter 122, SubChapter B 122.143(4) 5C THSC Chapter 382 382.085(b) PSDTX 1448, GC 14 PA PSDTX 1448, GC 8 PERMIT PSDTX 1448, SC 1 PERMIT ST&C 16 OP	
Description:	Failure to prevent unauthorized emissions to the atmosphere during non-reportable (recordable) emissions events.	
Self Report?	NO For Informational Purposes Only	
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) GT&C OP	
Description:	Failure to report all instances of deviations.	
Date: 09/		
	Classification: Moderate	
Self Report? Citation: Description:	YES For Informational Purposes Only 2D TWC Chapter 26, SubChapter A 26.121(a) 30 TAC Chapter 305, SubChapter F 305.125(1) Failure to meet the limit for one or more permit parameter	
	Self Report? Citation: Description: Date: 09/3 Self Report? Citation:	SC THSC Chapter 382 382.085(b)         PSDTX 1448, GC 14 PA         PSDTX 1448, GC 8 PERMIT         PSDTX 1448, SC 1 PERMIT         ST&C 16 OP         Description:         Failure to prevent unauthorized emissions to the atmosphere during non-reportable (recordable) emissions events.         Classification:         Moderate         Self Report?         NO         For Informational Purposes Only         Citation:         30 TAC Chapter 122, SubChapter B 122.143(4)         30 TAC Chapter 122, SubChapter B 122.145(2)         SC THSC Chapter 382 382.085(b)         GT&C OP         Description:         Failure to report all instances of deviations.         Date:       09/30/2020         Date:       09/30/2020         Self Report?       YES         For Informational Purposes Only         Citation:       2D TWC Chapter 26, SubChapter A 26.121(a)         30 TAC Chapter 305, SubChapter F 305.125(1)

\* NOVs applicable for the Compliance History rating period 9/1/2015 to 8/31/2020

## Appendix B All Investigations Conducted During Component Period May 12, 2016 and May 12, 2021

Item 1*	May 16, 2016**	(1345712) For Informational Purposes Only
Item 2	May 31, 2016**	(1308014) For Informational Purposes Only
Item 3*	June 17, 2016**	(1338085) For Informational Purposes Only
Item 4*	June 21, 2016**	(1338726) For Informational Purposes Only
Item 5	June 22, 2016**	(1329329) For Informational Purposes Only
Item 6	July 14, 2016**	(1359128) For Informational Purposes Only
Item 7*	July 25, 2016**	(1344859) For Informational Purposes Only
Item 8*	July 28, 2016**	(1349096) For Informational Purposes Only
Item 9*	August 02, 2016**	(1349188) For Informational Purposes Only
Item 10	August 03, 2016**	(1349366) For Informational Purposes Only
Item 11*	August 04, 2016**	(1349169) For Informational Purposes Only
Item 12*	August 16, 2016**	(1275931) For Informational Purposes Only
		(1365552)

Item 13*	August 18, 2016**	For Informational	Purposes Only
Item 14	August 23, 2016**	(1338121) For Informational	Purposes Only
Item 15*	August 26, 2016**	(1342188) For Informational	Purposes Only
Item 16	August 30, 2016**	(1349175) For Informational	Purposes Only
Item 17	August 31, 2016**	(1355247) For Informational	Purposes Only
Item 18*	September 16, 2016*	(1372253) For Informational	Purposes Only
Item 19	September 28, 2016*	(1357771) For Informational	Purposes Only
Item 20*	September 30, 2016*	(1363528) For Informational	Purposes Only
Item 21*	October 18, 2016**	<sup>(1378430)</sup> For Informational	Purposes Only
Item 22*	October 25, 2016**	<sup>(1364733)</sup> For Informational	Purposes Only
Item 23*	November 10, 2016*	(1371863) • For Informational	Purposes Only
Item 24*	November 17, 2016*	(1384389) • For Informational	Purposes Only
Item 25	November 29, 2016*	(1370328) • For Informational	Purposes Only
Item 26*	December 13, 2016* <sup>;</sup>	(1390527) • For Informational	Purposes Only
Item 27	December 16, 2016*	(1357800) • For Informational	Purposes Only
Item 28	January 05, 2017**	(1370561) For Informational	Purposes Only
Item 29*	January 17, 2017**	(1397143) For Informational	Purposes Only
Item 30	January 20, 2017**	(1370039) For Informational	Purposes Only
Item 31	January 25, 2017**	(1370038) For Informational	Purposes Only
Item 32*	January 26, 2017**	(1387943) For Informational	Purposes Only
Item 33*	February 14, 2017**	(1393753) For Informational	Purposes Only
Item 34*	February 16, 2017**	(1377914) For Informational Page	

		(1370290)
Item 35*	February 20, 2017**	For Informational Purposes Only
Item 36	March 09, 2017**	(1411128) For Informational Purposes Only
Item 37	March 14, 2017**	(1357499) For Informational Purposes Only
		(1401605)
Item 38*	March 22, 2017**	For Informational Purposes Only (1383077)
Item 39*	April 11, 2017**	For Informational Purposes Only
Item 40*	April 14, 2017**	(1402007) For Informational Purposes Only
		(1402109)
Item 41	April 19, 2017**	For Informational Purposes Only
Item 42	April 21, 2017**	(1402111) For Informational Purposes Only
Item 43*	May 18, 2017**	<sup>(1425220)</sup> For Informational Purposes Only
Item 44	May 19, 2017**	(1409010) For Informational Purposes Only
		(1400959)
Item 45*	May 25, 2017**	For Informational Purposes Only (1416000)
Item 46*	June 01, 2017**	For Informational Purposes Only
Item 47*	June 13, 2017**	(1416112) For Informational Purposes Only
Item 48	July 07, 2017**	(1422568) For Informational Purposes Only
Item 49*	July 16, 2017**	<sup>(1423925)</sup> For Informational Purposes Only
Item 50	July 19, 2017**	(1439832) For Informational Purposes Only
71 544		(1396487) For Informational Purposes Only
Item 51*	July 24, 2017**	For Informational Purposes Only (1420813)
Item 52	July 28, 2017**	For Informational Purposes Only
Item 53*	August 01, 2017**	(1429972) For Informational Purposes Only
Item 54*	August 04, 2017**	(1401463) For Informational Purposes Only
		(1443520)
Item 55*	August 18, 2017**	For Informational Purposes Only

		(1424158)
Item 56	August 21, 2017**	For Informational Purposes Only
Item 57*	August 29, 2017**	(1435824) For Informational Purposes Only
Item 58	August 31, 2017**	(1429815) For Informational Purposes Only
Item 59*	September 12, 2017*	(1436937) *For Informational Purposes Only
Item 60*	September 20, 2017*	(1450147) *For Informational Purposes Only
Item 61*	October 18, 2017**	(1455967) For Informational Purposes Only
Item 62*	November 14, 2017* <sup>,</sup>	(1461448) • For Informational Purposes Only
Item 63	December 11, 2017**	(1430479) For Informational Purposes Only
Item 64*	December 14, 2017**	(1442855) For Informational Purposes Only
Item 65*	December 19, 2017**	(1467827) For Informational Purposes Only
Item 66*	January 16, 2018**	(1474532) For Informational Purposes Only
Item 67	February 16, 2018**	<sup>(1486758)</sup> For Informational Purposes Only
Item 68	March 19, 2018**	(1490435) For Informational Purposes Only
Item 69*	April 06, 2018**	(1435175) For Informational Purposes Only
Item 70*	April 18, 2018**	(1493672) For Informational Purposes Only
Item 71*	May 04, 2018**	(1482739) For Informational Purposes Only
Item 72*	May 17, 2018**	(1500590) For Informational Purposes Only
Item 73	May 24, 2018**	(1478976) For Informational Purposes Only
Item 74*	June 11, 2018**	(1486276) For Informational Purposes Only
Item 75*	June 14, 2018**	(1507707) For Informational Purposes Only
Item 76	June 29, 2018**	(1483974) For Informational Purposes Only
		(1489984)

Item 77	July 11, 2018**	For Informational	Purposes Only
Item 78*	July 18, 2018**	<sup>(1514024)</sup> For Informational	Purposes Only
Item 79*	August 02, 2018**	(1506476) For Informational	Purposes Only
Item 80	August 17, 2018**	<sup>(1489978)</sup> For Informational	Purposes Only
Item 81*	August 20, 2018**	(1520086) For Informational	Purposes Only
Item 82*	August 27, 2018**	(1512265) For Informational	Purposes Only
Item 83	September 05, 2018*	(1512818) *For Informational	Purposes Only
Item 84*	September 20, 2018*	(1527251) *For Informational	Purposes Only
Item 85*	September 28, 2018*	(1513672) *For Informational	Purposes Only
Item 86*	October 01, 2018**	(1513685) For Informational	Purposes Only
Item 87*	October 11, 2018**	<sup>(1519563)</sup> For Informational	Purposes Only
Item 88*	October 17, 2018**	<sup>(1533609)</sup> For Informational	Purposes Only
Item 89	October 24, 2018**	(1512369) For Informational	Purposes Only
Item 90	November 14, 2018**	(1541444) For Informational	Purposes Only
Item 91*	November 29, 2018**	(1525087) For Informational	Purposes Only
Item 92	December 19, 2018**	(1545228) For Informational	Purposes Only
Item 93*	January 14, 2019**	(1532406) For Informational	Purposes Only
Item 94*	January 17, 2019**	(1559659) For Informational	Purposes Only
Item 95*	January 24, 2019**	(1539278) For Informational	Purposes Only
Item 96	January 29, 2019**	(1500318) For Informational	Purposes Only
Item 97	February 01, 2019**	(1540328) For Informational	Purposes Only
		(1559657)	- /

Item 98*	February 19, 2019**	For Informational Purposes Only
Item 99*	February 25, 2019**	(1549775) For Informational Purposes Only
Item 100*	March 18, 2019**	<sup>(1559658)</sup> For Informational Purposes Only
Item 101*	March 29, 2019**	(1551550) For Informational Purposes Only
Item 102*	April 18, 2019**	(1571825) For Informational Purposes Only
Item 103*	May 20, 2019**	<sup>(1583259)</sup> For Informational Purposes Only
Item 104*	May 28, 2019**	<sup>(1569602)</sup> For Informational Purposes Only
Item 105*	May 30, 2019**	<sup>(1553423)</sup> For Informational Purposes Only
Item 106	June 19, 2019**	(1557608) For Informational Purposes Only
Item 107*	June 21, 2019**	(1575818) For Informational Purposes Only
Item 108	June 25, 2019**	(1571573) For Informational Purposes Only
Item 109	June 26, 2019**	(1571669) For Informational Purposes Only
Item 110*	June 28, 2019**	(1570896) For Informational Purposes Only
Item 111*	July 02, 2019**	(1578105) For Informational Purposes Only
Item 112*	July 11, 2019**	(1575847) For Informational Purposes Only
Item 113*	July 19, 2019**	(1593138) For Informational Purposes Only
Item 114*	August 01, 2019**	(1580321) For Informational Purposes Only
Item 115*	August 07, 2019**	(1579874) For Informational Purposes Only
Item 116	August 08, 2019**	(1578969) For Informational Purposes Only
Item 117	August 15, 2019**	(1599484) For Informational Purposes Only
Item 118	August 23, 2019**	(1582081) For Informational Purposes Only
Item 119	August 29, 2019**	(1590970) For Informational Purposes Only
		Page 49

Item 120	August 30, 2019**	(1557529) For Informational Purposes Only
Item 121	September 18, 2019*	(1606389) For Informational Purposes Only
Item 122*	October 17, 2019**	(1613235) For Informational Purposes Only
Item 123*	November 01, 2019* <sup>.</sup>	(1604022) * For Informational Purposes Only
Item 124	November 19, 2019*	(1619049) * For Informational Purposes Only
Item 125	December 12, 2010*	(1604859) • For Informational Purposes Only
Item 125	December 12, 2019*	
Item 126*	December 19, 2019*	(1626401) • For Informational Purposes Only
Item 127	January 16, 2020**	(1634042) For Informational Purposes Only
Item 128*	February 18, 2020**	(1640661) For Informational Purposes Only
Item 129*	March 18, 2020**	(1647181) For Informational Purposes Only
Item 130	March 27, 2020**	(1623002) For Informational Purposes Only
Item 131*	April 17, 2020**	(1653517) For Informational Purposes Only
Item 132	May 18, 2020**	(1660104) For Informational Purposes Only
Item 133*	May 27, 2020**	(1651341) For Informational Purposes Only
Item 134	May 29, 2020**	(1644596) For Informational Purposes Only
Item 135*	June 18, 2020**	(1666608) For Informational Purposes Only
Item 136*	June 26, 2020**	(1657712) For Informational Purposes Only
Item 137*	June 29, 2020**	(1658245) For Informational Purposes Only
Item 138*	July 16, 2020**	(1673565) For Informational Purposes Only
Item 139*	July 29, 2020**	(1665306) For Informational Purposes Only
Item 140*	August 05, 2020**	(1665506) For Informational Purposes Only

Item 141	August 14, 2020**	(1670152) For Informational Purposes Only
Item 142	August 17, 2020**	(1659535) For Informational Purposes Only
		(1658179)
Item 143	August 20, 2020**	For Informational Purposes Only (1650930)
Item 144*	August 25, 2020**	For Informational Purposes Only
Item 145	August 26, 2020**	(1670055) For Informational Purposes Only
Item 146	August 28, 2020**	(1624119) For Informational Purposes Only
Item 147*	August 31, 2020**	(1671744) For Informational Purposes Only
Item 148*	September 17, 2020	(1686909) For Informational Purposes Only
Item 149*	September 25, 2020	(1678190) For Informational Purposes Only
Item 150*	October 06, 2020	(1679294) For Informational Purposes Only
Item 151	October 15, 2020	(1693256) For Informational Purposes Only
Item 152*	October 20, 2020	(1679423) For Informational Purposes Only
Item 153*	October 26, 2020	(1684969) For Informational Purposes Only
Item 154*	November 12, 2020	<sup>(1712458)</sup> For Informational Purposes Only
Item 155*	November 13, 2020	(1685140) For Informational Purposes Only
Item 156*	November 17, 2020	(1686149) For Informational Purposes Only
Item 157*	December 03, 2020	(1691410) For Informational Purposes Only
Item 158*	December 09, 2020	(1678701) For Informational Purposes Only
Item 159*	December 15, 2020	(1691806) For Informational Purposes Only
Item 160	December 16, 2020	(1691809) For Informational Purposes Only
Item 161	January 12, 2021	(1678327) For Informational Purposes Only
101	5411441 y 12, 2021	(1712460)

Item 162*	January 18, 2021	For Informational Purposes Only
Item 163*	March 03, 2021	(1703786) For Informational Purposes Only
Item 164	April 09, 2021	(1706523) For Informational Purposes Only
Item 165*	May 03, 2021	(1709524) For Informational Purposes Only
Item 166*	May 04, 2021	(1710914) For Informational Purposes Only

\* No violations documented during this investigation \*\*Investigation applicable for the Compliance History Rating period between 09/01/2015 and 08/31/2020.

# Addendum to Compliance History Federal Enforcement Actions

## Reg Entity Name: INVISTA SARL

Reg Entity Add:2695 OLD BLOOMINGTON RD NReg Entity City:VICTORIA

Reg Entity No: RN102663671

EPA Case No:	06-2016-3351	Order Issu	ie Date (yy	yymmdd): 20160322
Case Result:	Final Order No Penalty	Statute:	CAA	Sect of Statute: 112[R][7]
Classification:	Minor	Program:	Risk Manag	ement Progra Citation:
Violation Type:		Cite Sect:		Cite Part:
Enforcement Action: Administrative Compliance Orders				

Monday, January 11, 2021

# TEXAS COMMISSION ON ENVIRONMENTAL QUALITY



§

§ §

§

§

§

IN THE MATTER OF AN ENFORCEMENT ACTION CONCERNING INV PERFORMANCE SURFACES, LLC RN102663671 **BEFORE THE** 

TEXAS COMMISSION ON

ENVIRONMENTAL QUALITY

### AGREED ORDER DOCKET NO. 2021-0086-AIR-E

On \_\_\_\_\_\_\_, the Texas Commission on Environmental Quality ("the Commission" or "TCEQ") considered this agreement of the parties, resolving an enforcement action regarding INV Performance Surfaces, LLC (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 presented this Order to the Commission.

The Respondent understands that it has certain procedural rights at certain points in the enforcement process, including the right to formal notice of violations, notice of an evidentiary hearing, the right to an evidentiary hearing, and a right to appeal. By entering into this Order, the Respondent agrees to waive all notice and procedural rights.

It is further understood and agreed that 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. The duties and responsibilities imposed by this Order are binding upon the Respondent.

The Commission makes the following Findings of Fact and Conclusions of Law:

### I. FINDINGS OF FACT

- 1. The Respondent owns and operates a chemical manufacturing plant located at 2695 Old Bloomington Road North near Victoria, Victoria 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. During a record review conducted from November 10, 2020 through November 24, 2020, an investigator documented that:
  - a. The initial notification for Incident No. 325563 was due by November 23, 2019 at 5:42 a.m., but was not submitted until November 26, 2019 at 3:11 a.m.
  - b. The Respondent released 0.1 pound ("lb") of hydrogen cyanide and 316 lbs of volatile organic compounds as fugitive emissions, during an emissions event

(Incident No. 325563) that began on November 22, 2019 and lasted 200 hours. The emissions event occurred when the procedure to shut off the Pentenenitriles Flasher Tails Pump was not followed during start-up, the Relief Valve Sump Pump was unable to be primed that allowed material to overflow into the containment systems, and the Aqueous Sump Pump had pump body damage and was unable to be primed that allowed material to flow to the basin, resulting in the release to the atmosphere. TCEQ staff determined that the Respondent did not comply with the emissions event reporting requirements, the emissions event was not caused by a sudden unavoidable breakdown of equipment or process beyond the control of the owner or operator, and the emissions event could have been avoided by better design and/or better operational and maintenance practices.

- 3. During a record review conducted from September 29, 2020 through November 3, 2020, an investigator documented that:
  - a. The initial notification for Incident No. 342433 was due by September 12, 2020 at 2:57 p.m., but was not submitted until September 17, 2020 at 4:39 p.m.
  - b. The Respondent released 0.1 lb of acetonitrile, 655.1 lbs of ammonia, 6.13 lbs of carbon monoxide, and 16.48 lbs of hydrogen cyanide as fugitive emissions, during an emissions event (Incident No. 342433) that occurred on September 11, 2020 and lasted eight minutes. The emissions event occurred due to the failure of a solenoid for the back pressure automatic valve that caused the valve to close, resulting in the venting to the atmosphere. TCEQ staff determined that the Respondent did not comply with the emissions event reporting requirements.
- 4. The Executive Director recognizes that the Respondent implemented the following corrective measures at the Plant:
  - a. On November 26, 2019, submitted the initial notification for Incident No. 325563.
  - b. On September 17, 2020, submitted the initial notification for Incident No. 342433.
  - c. By December 31, 2020, replaced the valve solenoid and the No. 4 Converter Rupture Discs, conducted a function test of the valve and sail switches, verified the high alarm on the No. 4 Converter Mixer inlet pressure, checked the Interlock Check Procedure, updated the work order to automatically reserve solenoid components, and set reminders for the change out of all the converter automatics in order to prevent the recurrence of emissions events due to the same or similar causes as Incident No. 342433.
  - d. By February 3, 2021, conducted training in order to ensure that the initial notifications for reportable emissions events are submitted in a timely manner.

#### **II. CONCLUSIONS OF LAW**

- 1. As evidenced by Finding of Fact No. 1, the Respondent is subject to the jurisdiction of the TCEQ pursuant to TEX. HEALTH & SAFETY CODE ch. 382 and the rules of the TCEQ.
- 2. As evidenced by Finding of Fact No. 2.a, the Respondent failed to submit an initial notification for a reportable emissions event no later than 24 hours after the discovery of an emissions event, in violation of 30 TEX. ADMIN. CODE §§ 101.201(a)(1)(B) and 122.143(4), Federal Operating Permit ("FOP") No. 01904, General Terms and Conditions ("GTC") and Special Terms and Conditions ("STC") No. 2.F, and TEX. HEALTH & SAFETY CODE § 382.085(b).
- 3. As evidenced by Finding of Fact No. 2.b, the Respondent failed to prevent unauthorized emissions, in violation of 30 TEX. ADMIN. CODE §§ 101.20(3), 116.115(c), and 122.143(4), New Source Review ("NSR") Permit Nos. 7186, PSDTX1079M2, and GHGPSDTX145M1, Special Conditions ("SC") No. 1, FOP No. 01904, GTC and STC No. 28, and TEX. HEALTH & SAFETY CODE § 382.085(b). Since the Respondent did not comply with the emissions event reporting requirements, the emissions event was not caused by a sudden unavoidable breakdown of equipment or process beyond the control of the owner or operator, and the emissions event could have been avoided by better design and/or better operational and maintenance practices, the Respondent is precluded from asserting an affirmative defense under 30 TEX. ADMIN. CODE § 101.222.
- 4. As evidenced by Finding of Fact No. 3.a, the Respondent failed to submit an initial notification for a reportable emissions event no later than 24 hours after the discovery of an emissions event, in violation of 30 TEX. ADMIN. CODE §§ 101.201(a)(1)(B) and 122.143(4), FOP No. O1904, GTC and STC No. 2.F, and TEX. HEALTH & SAFETY CODE § 382.085(b).
- 5. As evidenced by Finding of Fact No. 3.b, the Respondent failed to prevent unauthorized emissions, in violation of 30 TEX. ADMIN. CODE §§ 101.20(3), 116.115(c), and 122.143(4), NSR Permit Nos. 7186, PSDTX1079M2, and GHGPSDTX145M1, SC No. 1, FOP No. O1904, GTC and STC No. 28, and TEX. HEALTH & SAFETY CODE § 382.085(b). Since the Respondent did not comply with the emissions event reporting requirements, the Respondent is precluded from asserting an affirmative defense under 30 TEX. ADMIN. CODE § 101.222.
- 6. Pursuant to TEX. WATER CODE § 7.051, the TCEQ has the authority to assess an administrative penalty against the Respondent for violations of state statutes within the TCEQ's jurisdiction, for violations of rules adopted under such statutes, or for violations of orders or permits issued under such statutes.
- 7. An administrative penalty in the amount of \$21,575 is justified by the facts recited in this Order, and considered in light of the factors set forth in TEX. WATER CODE § 7.053. The Respondent paid the \$21,575 penalty.

#### **III. ORDERING PROVISIONS**

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

1. The Respondent is assessed a penalty as set forth in Conclusion of Law No. 7 for violations of state statutes and rules of the TCEQ. The payment of this penalty and the Respondent's compliance with all the requirements set forth in this Order resolve only the matters set forth by this Order in this action. The Commission shall not be constrained in any manner from requiring corrective actions or penalties for violations that are not raised here. Penalty payments shall be made payable to "TCEQ" and shall be sent with the notation "Re: INV Performance Surfaces, LLC, Docket No. 2021-0086-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:
  - a. Within 30 days after the effective date of this Order, implement measures and/or procedures designed to prevent the recurrence of emissions events due to the same or similar causes as Incident No. 325563.
  - Within 45 days after the effective date of this Order, submit written certification, and include detailed supporting documentation including photographs, receipts, and/or other records to demonstrate compliance with Ordering Provision No.
     2.a. 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:

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

with a copy to:

Air Section Manager Corpus Christi Regional Office Texas Commission on Environmental Quality 6300 Ocean Drive, Suite 1200 Corpus Christi, Texas 78412-5839

- 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 Order Compliance Team at the address listed above.
- 7. 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 in this Order.
- 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. 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.
- 10. 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.
- 11. 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		
( in the	12/01/2021		
For the Executive Director	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 Attorney General's Office 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 Attorney General's Office 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.

Jason Leigh	
Signature	
Jason Leigh	
Name (Printed or typed) Authorized Representativ	e of

INV Performance Surfaces, LLC

□ 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.

14 June 2021

Date

**Technical Manager** 

Title