

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

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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,

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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



Penalty Calculation Worksheet (PCW)

Policy Revision 4 (April 2014)

PCW Revision March 26, 2014

DATES	Assigned	4-Jan-2021	Screening	11-Jan-2021	EPA Due	
	PCW	12-May-2021				

RESPONDENT/FACILITY INFORMATION	
Respondent	INV Performance Surfaces, LLC
Reg. Ent. Ref. No.	RN102663671
Facility/Site Region	14-Corpus Christi
Major/Minor Source	Major

CASE INFORMATION			
Enf./Case ID No.	60259	No. of Violations	2
Docket No.	2021-0086-AIR-E	Order Type	Findings
Media Program(s)	Air	Government/Non-Profit	No
Multi-Media		Enf. Coordinator	Yuliya Dunaway
		EC's Team	Enforcement Team 4
Admin. Penalty \$ Limit Minimum	\$0	Maximum	\$25,000

Penalty Calculation Section

TOTAL BASE PENALTY (Sum of violation base penalties)	Subtotal 1	\$4,000
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ADJUSTMENTS (+/-) TO SUBTOTAL 1

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

Compliance History	100.0%	Adjustment	Subtotals 2, 3, & 7	\$4,000
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Notes: Enhancement for four NOVs with same/similar violations, three NOVs with dissimilar violations, and five orders containing a denial of liability. Reduction for eight notices of intent to conduct an audit and five disclosures of violations.

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

Good Faith Effort to Comply Total Adjustments	Subtotal 5	-\$25
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Economic Benefit	0.0%	Enhancement*	Subtotal 6	\$0
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Total EB Amounts: \$1,146
 Estimated Cost of Compliance: \$11,750
 *Capped at the Total EB \$ Amount

SUM OF SUBTOTALS 1-7	Final Subtotal	\$7,975
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OTHER FACTORS AS JUSTICE MAY REQUIRE	0.0%	Adjustment	\$0
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Reduces or enhances the Final Subtotal by the indicated percentage.

Notes:

Final Penalty Amount	\$7,975
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STATUTORY LIMIT ADJUSTMENT	Final Assessed Penalty	\$7,975
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DEFERRAL	0.0%	Reduction	Adjustment	\$0
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Reduces the Final Assessed Penalty by the indicated percentage.

Notes:

No deferral is recommended for Findings Orders.

PAYABLE PENALTY	\$7,975
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Screening Date 11-Jan-2021

Docket No. 2021-0086-AIR-E

PCW

Respondent INV Performance Surfaces, LLC

Policy Revision 4 (April 2014)

Case ID No. 60259

PCW Revision March 26, 2014

Reg. Ent. Reference No. RN102663671

Media Air

Enf. Coordinator Yuliya Dunaway

Compliance History Worksheet

>> Compliance History Site Enhancement (Subtotal 2)

Component	Number of...	Number	Adjust.
NOVs	Written notices of violation ("NOVs") with same or similar violations as those in the current enforcement action (<i>number of NOVs meeting criteria</i>)	4	20%
	Other written NOVs	3	6%
Orders	Any agreed final enforcement orders containing a denial of liability (<i>number of orders meeting criteria</i>)	5	100%
	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 Decrees	Any non-adjudicated final court judgments or consent decrees containing a denial of liability of this state or the federal government (<i>number of judgments or consent decrees meeting criteria</i>)	0	0%
	Any adjudicated final court judgments and default judgments, or non-adjudicated final court judgments or consent decrees without a denial of liability, of this state or the federal government	0	0%
Convictions	Any criminal convictions of this state or the federal government (<i>number of counts</i>)	0	0%
Emissions	Chronic excessive emissions events (<i>number of events</i>)	0	0%
Audits	Letters notifying the executive director of an intended audit conducted under the Texas Environmental, Health, and Safety Audit Privilege Act, 74th Legislature, 1995 (<i>number of audits for which notices were submitted</i>)	8	-8%
	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%
Other	Environmental management systems in place for one year or more	No	0%
	Voluntary on-site compliance assessments conducted by the executive director under a special assistance program	No	0%
	Participation in a voluntary pollution reduction program	No	0%
	Early compliance with, or offer of a product that meets future state or federal government environmental requirements	No	0%

Adjustment Percentage (Subtotal 2) 108%

>> Repeat Violator (Subtotal 3)

No

Adjustment Percentage (Subtotal 3) 0%

>> Compliance History Person Classification (Subtotal 7)

Satisfactory Performer

Adjustment Percentage (Subtotal 7) 0%

>> Compliance History Summary

Compliance History Notes

Enhancement for four NOVs with same/similar violations, three NOVs with dissimilar violations, and five orders containing a denial of liability. Reduction for eight notices of intent to conduct an audit and five disclosures of violations.

Total Compliance History Adjustment Percentage (Subtotals 2, 3, & 7) 108%

>> Final Compliance History Adjustment

Final Adjustment Percentage *capped at 100% 100%

Screening Date 11-Jan-2021

Docket No. 2021-0086-AIR-E

PCW

Respondent INV Performance Surfaces, LLC

Policy Revision 4 (April 2014)

Case ID No. 60259

PCW Revision March 26, 2014

Reg. Ent. Reference No. RN102663671

Media Air

Enf. Coordinator Yuliya Dunaway

Violation Number 1

Rule Cite(s) 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)

Violation Description Failed to submit an initial notification for a reportable emissions event no later than 24 hours after the discovery of an emissions event. Specifically, 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.

Base Penalty \$25,000

>> Environmental, Property and Human Health Matrix

OR	Release	Harm			Percent
		Major	Moderate	Minor	
	Actual				0.0%
	Potential				

>> Programmatic Matrix

Matrix Notes	Falsification	Major	Moderate	Minor	Percent
				x	

Less than 30% of the rule requirements were not met.

Adjustment \$24,750

\$250

Violation Events

Number of Violation Events 1 Number of violation days 3

daily	
weekly	
monthly	
quarterly	
semiannual	
annual	
single event	x

Violation Base Penalty \$250

One single event is recommended.

Good Faith Efforts to Comply

10.0% Reduction \$25

	Before NOE/NOV	NOE/NOV to EDPRP/Settlement Offer
Extraordinary		
Ordinary		x
N/A		

Notes The Respondent achieved compliance by February 3, 2021, after the Notice of Enforcement dated December 16, 2020.

Violation Subtotal \$225

Economic Benefit (EB) for this violation

Statutory Limit Test

Estimated EB Amount \$90

Violation Final Penalty Total \$475

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

Economic Benefit Worksheet

Respondent INV Performance Surfaces, LLC
Case ID No. 60259
Reg. Ent. Reference No. RN102663671
Media Air
Violation No. 1

Percent Interest	Years of Depreciation
5.0	15

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

Equipment				0.00	\$0	\$0	\$0
Buildings				0.00	\$0	\$0	\$0
Other (as needed)				0.00	\$0	\$0	\$0
Engineering/Construction				0.00	\$0	\$0	\$0
Land				0.00	\$0	n/a	\$0
Record Keeping System	\$1,500	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

Notes for DELAYED costs

Estimated costs to submit the initial notification for Incident No. 325563 (\$250) and to conduct training in order to ensure that the initial notifications for reportable emissions events are submitted in a timely manner (\$1,500). The Dates Required are the date the initial notification was due and the Final Dates are the date the initial notification was submitted and the date of compliance.

Avoided Costs

ANNUALIZE avoided costs before entering item (except for one-time avoided costs)

Disposal				0.00	\$0	\$0	\$0
Personnel				0.00	\$0	\$0	\$0
Inspection/Reporting/Sampling				0.00	\$0	\$0	\$0
Supplies/Equipment				0.00	\$0	\$0	\$0
Financial Assurance				0.00	\$0	\$0	\$0
ONE-TIME avoided costs				0.00	\$0	\$0	\$0
Other (as needed)				0.00	\$0	\$0	\$0

Notes for AVOIDED costs

Approx. Cost of Compliance

\$1,750

TOTAL

\$90

Screening Date 11-Jan-2021

Docket No. 2021-0086-AIR-E

PCW

Respondent INV Performance Surfaces, LLC

Policy Revision 4 (April 2014)

Case ID No. 60259

PCW Revision March 26, 2014

Reg. Ent. Reference No. RN102663671

Media Air

Enf. Coordinator Yuliya Dunaway

Violation Number 2

Rule Cite(s) 30 Tex. Admin. Code §§ 101.20(3), 116.115(c), and 122.143(4), New Source Review Permit Nos. 7186, PSDTX1079M2, and GHGPSDTX145M1, Special Conditions No. 1, FOP No. O1904, GTC and STC No. 28, and Tex. Health & Safety Code § 382.085(b)

Violation Description

Failed to prevent unauthorized emissions. Specifically, 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. 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.

Base Penalty \$25,000

>> Environmental, Property and Human Health Matrix

Table with columns: Release (Actual, Potential), Harm (Major, Moderate, Minor), Percent (15.0%).

>> Programmatic Matrix

Table with columns: Falsification, Major, Moderate, Minor, Percent (0.0%).

Matrix Notes Human health or the environment has been exposed to insignificant amounts of pollutants which do not exceed levels that are protective of human health or the environmental receptors as a result of this violation.

Adjustment \$21,250

\$3,750

Violation Events

Number of Violation Events 1 9 Number of violation days

Table with columns: Frequency (daily, weekly, monthly, quarterly, semiannual, annual, single event), Count (x).

Violation Base Penalty \$3,750

One quarterly event is recommended.

Good Faith Efforts to Comply

0.0%

Reduction \$0

Before NOE/NOV NOE/NOV to EDPRP/Settlement Offer

Table with columns: Effort Type (Extraordinary, Ordinary, N/A), Count (x).

Notes The Respondent does not meet the good faith criteria for this violation.

Violation Subtotal \$3,750

Economic Benefit (EB) for this violation

Statutory Limit Test

Estimated EB Amount \$1,056

Violation Final Penalty Total \$7,500

This violation Final Assessed Penalty (adjusted for limits) \$7,500

Economic Benefit Worksheet

Respondent INV Performance Surfaces, LLC
Case ID No. 60259
Reg. Ent. Reference No. RN102663671
Media Air
Violation No. 2

Percent Interest	Years of Depreciation
5.0	15

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

Equipment				0.00	\$0	\$0	\$0
Buildings				0.00	\$0	\$0	\$0
Other (as needed)				0.00	\$0	\$0	\$0
Engineering/Construction				0.00	\$0	\$0	\$0
Land				0.00	\$0	n/a	\$0
Record Keeping System				0.00	\$0	n/a	\$0
Training/Sampling				0.00	\$0	n/a	\$0
Remediation/Disposal				0.00	\$0	n/a	\$0
Permit Costs				0.00	\$0	n/a	\$0
Other (as needed)	\$10,000	22-Nov-2019	1-Jan-2022	2.11	\$1,056	n/a	\$1,056

Notes for DELAYED costs

Estimated cost to implement measures and/or procedures designed to prevent the recurrence of emissions events due to the same or similar causes as Incident No. 325563. The Date Required is the date the emissions event began and the Final Date is the estimated date of compliance.

Avoided Costs

ANNUALIZE avoided costs before entering item (except for one-time avoided costs)

Disposal				0.00	\$0	\$0	\$0
Personnel				0.00	\$0	\$0	\$0
Inspection/Reporting/Sampling				0.00	\$0	\$0	\$0
Supplies/Equipment				0.00	\$0	\$0	\$0
Financial Assurance				0.00	\$0	\$0	\$0
ONE-TIME avoided costs				0.00	\$0	\$0	\$0
Other (as needed)				0.00	\$0	\$0	\$0

Notes for AVOIDED costs

Approx. Cost of Compliance

\$10,000

TOTAL

\$1,056



Penalty Calculation Worksheet (PCW)

Policy Revision 4 (April 2014)

PCW Revision March 26, 2014

DATES	Assigned	20-Jan-2021	Screening	25-Jan-2021	EPA Due	
	PCW	12-May-2021				

RESPONDENT/FACILITY INFORMATION	
Respondent	INV Performance Surfaces, LLC
Reg. Ent. Ref. No.	RN102663671
Facility/Site Region	14-Corpus Christi
Major/Minor Source	Major

CASE INFORMATION			
Enf./Case ID No.	60259	No. of Violations	2
Docket No.	2021-0086-AIR-E	Order Type	Findings
Media Program(s)	Air	Government/Non-Profit	No
Multi-Media		Enf. Coordinator	Yuliya Dunaway
		EC's Team	Enforcement Team 4
Admin. Penalty \$ Limit Minimum	\$0	Maximum	\$25,000

Penalty Calculation Section

TOTAL BASE PENALTY (Sum of violation base penalties)	Subtotal 1	\$7,750
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ADJUSTMENTS (+/-) TO SUBTOTAL 1

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

Compliance History	100.0%	Adjustment	Subtotals 2, 3, & 7	\$7,750
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Notes: Enhancement for four NOVs with same/similar violations, two NOVs with dissimilar violations, and five orders containing a denial of liability. Reduction for nine notices of intent to conduct an audit and four disclosures of violations.

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

Good Faith Effort to Comply Total Adjustments	Subtotal 5	-\$1,900
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Economic Benefit	0.0%	Enhancement*	Subtotal 6	\$0
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Total EB Amounts: \$264
 Estimated Cost of Compliance: \$36,750
 *Capped at the Total EB \$ Amount

SUM OF SUBTOTALS 1-7	Final Subtotal	\$13,600
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OTHER FACTORS AS JUSTICE MAY REQUIRE	0.0%	Adjustment	\$0
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Reduces or enhances the Final Subtotal by the indicated percentage.

Notes:

Final Penalty Amount	\$13,600
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STATUTORY LIMIT ADJUSTMENT	Final Assessed Penalty	\$13,600
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DEFERRAL	0.0%	Reduction	Adjustment	\$0
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Reduces the Final Assessed Penalty by the indicated percentage.

Notes:

No deferral is recommended for Findings Orders.

PAYABLE PENALTY	\$13,600
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Screening Date 25-Jan-2021

Docket No. 2021-0086-AIR-E

PCW

Respondent INV Performance Surfaces, LLC

Policy Revision 4 (April 2014)

Case ID No. 60259

PCW Revision March 26, 2014

Reg. Ent. Reference No. RN102663671

Media Air

Enf. Coordinator Yuliya Dunaway

Compliance History Worksheet

>> Compliance History Site Enhancement (Subtotal 2)

Component	Number of...	Number	Adjust.
NOVs	Written notices of violation ("NOVs") with same or similar violations as those in the current enforcement action (<i>number of NOVs meeting criteria</i>)	4	20%
	Other written NOVs	2	4%
Orders	Any agreed final enforcement orders containing a denial of liability (<i>number of orders meeting criteria</i>)	5	100%
	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 Decrees	Any non-adjudicated final court judgments or consent decrees containing a denial of liability of this state or the federal government (<i>number of judgments or consent decrees meeting criteria</i>)	0	0%
	Any adjudicated final court judgments and default judgments, or non-adjudicated final court judgments or consent decrees without a denial of liability, of this state or the federal government	0	0%
Convictions	Any criminal convictions of this state or the federal government (<i>number of counts</i>)	0	0%
Emissions	Chronic excessive emissions events (<i>number of events</i>)	0	0%
Audits	Letters notifying the executive director of an intended audit conducted under the Texas Environmental, Health, and Safety Audit Privilege Act, 74th Legislature, 1995 (<i>number of audits for which notices were submitted</i>)	9	-9%
	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%
Other	Environmental management systems in place for one year or more	No	0%
	Voluntary on-site compliance assessments conducted by the executive director under a special assistance program	No	0%
	Participation in a voluntary pollution reduction program	No	0%
	Early compliance with, or offer of a product that meets future state or federal government environmental requirements	No	0%

Adjustment Percentage (Subtotal 2) 107%

>> Repeat Violator (Subtotal 3)

No

Adjustment Percentage (Subtotal 3) 0%

>> Compliance History Person Classification (Subtotal 7)

Satisfactory Performer

Adjustment Percentage (Subtotal 7) 0%

>> Compliance History Summary

Compliance History Notes

Enhancement for four NOVs with same/similar violations, two NOVs with dissimilar violations, and five orders containing a denial of liability. Reduction for nine notices of intent to conduct an audit and four disclosures of violations.

Total Compliance History Adjustment Percentage (Subtotals 2, 3, & 7) 107%

>> Final Compliance History Adjustment

Final Adjustment Percentage *capped at 100% 100%

Screening Date 25-Jan-2021

Docket No. 2021-0086-AIR-E

PCW

Respondent INV Performance Surfaces, LLC

Policy Revision 4 (April 2014)

Case ID No. 60259

PCW Revision March 26, 2014

Reg. Ent. Reference No. RN102663671

Media Air

Enf. Coordinator Yuliya Dunaway

Violation Number 1

Rule Cite(s) 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)

Violation Description Failed to submit an initial notification for a reportable emissions event no later than 24 hours after the discovery of an emissions event. Specifically, 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.

Base Penalty \$25,000

>> Environmental, Property and Human Health Matrix

OR	Release	Harm			Percent
		Major	Moderate	Minor	
	Actual				0.0%
	Potential				

>> Programmatic Matrix

	Falsification	Major	Moderate	Minor	Percent
				x	1.0%

Matrix Notes Less than 30% of the rule requirements were not met.

Adjustment \$24,750

\$250

Violation Events

Number of Violation Events 1 5 Number of violation days

daily	
weekly	
monthly	
quarterly	
semiannual	
annual	
single event	x

Violation Base Penalty \$250

One single event is recommended.

Good Faith Efforts to Comply

10.0%

Reduction \$25

	Before NOE/NOV	NOE/NOV to EDPRP/Settlement Offer
Extraordinary		
Ordinary		x
N/A		

Notes The Respondent achieved compliance by February 3, 2021, after to the Notice of Enforcement ("NOE") dated January 11, 2021.

Violation Subtotal \$225

Economic Benefit (EB) for this violation

Statutory Limit Test

Estimated EB Amount \$30

Violation Final Penalty Total \$475

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

Economic Benefit Worksheet

Respondent INV Performance Surfaces, LLC
Case ID No. 60259
Reg. Ent. Reference No. RN102663671
Media Air
Violation No. 1

Percent Interest	Years of Depreciation
5.0	15

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

Equipment				0.00	\$0	\$0	\$0
Buildings				0.00	\$0	\$0	\$0
Other (as needed)				0.00	\$0	\$0	\$0
Engineering/Construction				0.00	\$0	\$0	\$0
Land				0.00	\$0	n/a	\$0
Record Keeping System				0.00	\$0	n/a	\$0
Training/Sampling	\$1,500	12-Sep-2020	3-Feb-2021	0.39	\$30	n/a	\$30
Remediation/Disposal				0.00	\$0	n/a	\$0
Permit Costs				0.00	\$0	n/a	\$0
Other (as needed)	\$250	12-Sep-2020	17-Sep-2020	0.01	\$0	n/a	\$0

Notes for DELAYED costs

Estimated costs to submit the initial notification for Incident No. 342433 (\$250) and to conduct training in order to ensure that the initial notifications for reportable emissions events are submitted in a timely manner (\$1,500). The Dates Required are the date the initial notification was due and the Final Dates are the date the initial notification was submitted and the date of compliance.

Avoided Costs

ANNUALIZE avoided costs before entering item (except for one-time avoided costs)

Disposal				0.00	\$0	\$0	\$0
Personnel				0.00	\$0	\$0	\$0
Inspection/Reporting/Sampling				0.00	\$0	\$0	\$0
Supplies/Equipment				0.00	\$0	\$0	\$0
Financial Assurance				0.00	\$0	\$0	\$0
ONE-TIME avoided costs				0.00	\$0	\$0	\$0
Other (as needed)				0.00	\$0	\$0	\$0

Notes for AVOIDED costs

Approx. Cost of Compliance \$1,750

TOTAL \$30

Screening Date 25-Jan-2021

Docket No. 2021-0086-AIR-E

PCW

Respondent INV Performance Surfaces, LLC

Policy Revision 4 (April 2014)

Case ID No. 60259

PCW Revision March 26, 2014

Reg. Ent. Reference No. RN102663671

Media Air

Enf. Coordinator Yuliya Dunaway

Violation Number 2

Rule Cite(s) 30 Tex. Admin. Code §§ 101.20(3), 116.115(c), and 122.143(4), New Source Review Permit Nos. 7186, PSDTX1079M2, and GHGPSDTX145M1, Special Conditions No. 1, FOP No. O1904, GTC and STC No. 28, and Tex. Health & Safety Code § 382.085(b)

Violation Description Failed to prevent unauthorized emissions. Specifically, the Respondent released 0.1 pound ("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. 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.

Base Penalty \$25,000

>> Environmental, Property and Human Health Matrix

OR	Release	Harm			Percent
		Major	Moderate	Minor	
Actual			x		30.0%
Potential					

>> Programmatic Matrix

Matrix Notes	Falsification	Harm			Percent
		Major	Moderate	Minor	
					0.0%

Human health or the environment has been exposed to significant amounts of pollutants which do not exceed levels that are protective of human health or the environmental receptors as a result of this violation.

Adjustment \$17,500

\$7,500

Violation Events

Number of Violation Events 1 1 Number of violation days

daily	
weekly	
monthly	x
quarterly	
semiannual	
annual	
single event	

Violation Base Penalty \$7,500

One monthly event is recommended.

Good Faith Efforts to Comply

25.0%

Reduction \$1,875

Before NOE/NOV NOE/NOV to EDPRP/Settlement Offer

Extraordinary		
Ordinary	x	
N/A		

Notes The Respondent achieved compliance by December 31, 2020, before the NOE dated January 11, 2021.

Violation Subtotal \$5,625

Economic Benefit (EB) for this violation

Statutory Limit Test

Estimated EB Amount \$234

Violation Final Penalty Total \$13,125

This violation Final Assessed Penalty (adjusted for limits) \$13,125

Economic Benefit Worksheet

Respondent INV Performance Surfaces, LLC
Case ID No. 60259
Reg. Ent. Reference No. RN102663671
Media Air
Violation No. 2

Percent Interest	Years of Depreciation
5.0	15

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

Equipment	\$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				0.00	\$0	n/a	\$0
Other (as needed)	\$10,000	11-Sep-2020	31-Dec-2020	0.30	\$152	n/a	\$152

Notes for DELAYED costs

Estimated costs to replace the valve solenoid and the No. 4 Converter Rupture Discs (\$25,000) and to conduct a function test of the valve and sail switches, verify the high alarm on the No. 4 Converter Mixer inlet pressure, check the Interlock Check Procedure, update the work order to automatically reserve solenoid components, and set reminders for the change out of all the converter automatics (\$10,000) in order to prevent the recurrence of emissions events due to the same or similar causes as Incident No. 342433. The Dates Required are the date the emissions event occurred and the Final Dates are the dates of compliance.

Avoided Costs

ANNUALIZE avoided costs before entering item (except for one-time avoided costs)

Disposal				0.00	\$0	\$0	\$0
Personnel				0.00	\$0	\$0	\$0
Inspection/Reporting/Sampling				0.00	\$0	\$0	\$0
Supplies/Equipment				0.00	\$0	\$0	\$0
Financial Assurance				0.00	\$0	\$0	\$0
ONE-TIME avoided costs				0.00	\$0	\$0	\$0
Other (as needed)				0.00	\$0	\$0	\$0

Notes for AVOIDED costs

Approx. Cost of Compliance

\$35,000

TOTAL

\$234



Compliance History Report

Compliance History Report for CN602582231, RN102663671, Rating Year 2020 which includes Compliance History (CH) components from September 1, 2015, through August 31, 2020.

Customer, Respondent, or Owner/Operator:	CN602582231, INV Performance Surfaces, LLC	Classification:	SATISFACTORY	Rating:	6.15
Regulated Entity:	RN102663671, INV NYLON CHEMICALS AMERICAS VICTORIA SITE	Classification:	SATISFACTORY	Rating:	7.65
Complexity Points:	52	Repeat Violator:	NO		
CH Group:	05 - Chemical Manufacturing				
Location:	2695 OLD BLOOMINGTON RD NORTH NEAR VICTORIA, VICTORIA COUNTY, TX				
TCEQ Region:	REGION 14 - CORPUS CHRISTI				

ID Number(s):

AIR OPERATING PERMITS PERMIT 1867
AIR OPERATING PERMITS PERMIT 1902
AIR OPERATING PERMITS ACCOUNT NUMBER VCA001A
PUBLIC WATER SYSTEM/SUPPLY REGISTRATION 2350014

AIR OPERATING PERMITS PERMIT 1415
AIR OPERATING PERMITS PERMIT 1904
AIR OPERATING PERMITS ACCOUNT NUMBER VC0008Q
AIR NEW SOURCE PERMITS PERMIT 809

AIR NEW SOURCE PERMITS PERMIT 810
AIR NEW SOURCE PERMITS PERMIT 813
AIR NEW SOURCE PERMITS REGISTRATION 7873
AIR NEW SOURCE PERMITS REGISTRATION 14751
AIR NEW SOURCE PERMITS PERMIT 31376
AIR NEW SOURCE PERMITS REGISTRATION 43301
AIR NEW SOURCE PERMITS REGISTRATION 43501
AIR NEW SOURCE PERMITS REGISTRATION 45256
AIR NEW SOURCE PERMITS ACCOUNT NUMBER VC0008Q
AIR NEW SOURCE PERMITS REGISTRATION 71504
AIR NEW SOURCE PERMITS REGISTRATION 56688
AIR NEW SOURCE PERMITS REGISTRATION 74109
AIR NEW SOURCE PERMITS REGISTRATION 76575
AIR NEW SOURCE PERMITS REGISTRATION 80416L
AIR NEW SOURCE PERMITS REGISTRATION 92605
AIR NEW SOURCE PERMITS EPA PERMIT PSDTX1079M1
AIR NEW SOURCE PERMITS REGISTRATION 91536
AIR NEW SOURCE PERMITS REGISTRATION 96200
AIR NEW SOURCE PERMITS REGISTRATION 98317
AIR NEW SOURCE PERMITS REGISTRATION 99179
AIR NEW SOURCE PERMITS REGISTRATION 141367
AIR NEW SOURCE PERMITS REGISTRATION 131067
AIR NEW SOURCE PERMITS REGISTRATION 119719
AIR NEW SOURCE PERMITS EPA PERMIT PSDTX1079M2
AIR NEW SOURCE PERMITS REGISTRATION 122193
AIR NEW SOURCE PERMITS EPA PERMIT GHGSPSDTX145
AIR NEW SOURCE PERMITS REGISTRATION 105728
AIR NEW SOURCE PERMITS REGISTRATION 111677
AIR NEW SOURCE PERMITS REGISTRATION 115101
AIR NEW SOURCE PERMITS REGISTRATION 122060
AIR NEW SOURCE PERMITS REGISTRATION 136474
AIR NEW SOURCE PERMITS EPA PERMIT PSDTX1448
AIR NEW SOURCE PERMITS REGISTRATION 111678
AIR NEW SOURCE PERMITS EPA PERMIT GHGSPSDTX13
AIR NEW SOURCE PERMITS REGISTRATION 134439
AIR NEW SOURCE PERMITS PERMIT AMOC58

AIR NEW SOURCE PERMITS PERMIT 812
AIR NEW SOURCE PERMITS PERMIT 7186
AIR NEW SOURCE PERMITS PERMIT 9560
AIR NEW SOURCE PERMITS PERMIT 23271
AIR NEW SOURCE PERMITS REGISTRATION 37067
AIR NEW SOURCE PERMITS REGISTRATION 43502
AIR NEW SOURCE PERMITS REGISTRATION 44234
AIR NEW SOURCE PERMITS REGISTRATION 47610
AIR NEW SOURCE PERMITS AFS NUM 4846900001
AIR NEW SOURCE PERMITS REGISTRATION 71789
AIR NEW SOURCE PERMITS REGISTRATION 73896
AIR NEW SOURCE PERMITS REGISTRATION 73898
AIR NEW SOURCE PERMITS EPA PERMIT PSDTX1079
AIR NEW SOURCE PERMITS REGISTRATION 89577
AIR NEW SOURCE PERMITS REGISTRATION 93064
AIR NEW SOURCE PERMITS REGISTRATION 92217
AIR NEW SOURCE PERMITS REGISTRATION 92339
AIR NEW SOURCE PERMITS REGISTRATION 102817
AIR NEW SOURCE PERMITS REGISTRATION 109746
AIR NEW SOURCE PERMITS REGISTRATION 103298
AIR NEW SOURCE PERMITS REGISTRATION 105010
AIR NEW SOURCE PERMITS REGISTRATION 111679
AIR NEW SOURCE PERMITS EPA PERMIT GHGSPSDTX129
AIR NEW SOURCE PERMITS REGISTRATION 131268
AIR NEW SOURCE PERMITS REGISTRATION 108018
AIR NEW SOURCE PERMITS REGISTRATION 138475
AIR NEW SOURCE PERMITS EPA PERMIT PSDTX1416
AIR NEW SOURCE PERMITS REGISTRATION 115157
AIR NEW SOURCE PERMITS REGISTRATION 122233
AIR NEW SOURCE PERMITS REGISTRATION 122834
AIR NEW SOURCE PERMITS REGISTRATION 106823
AIR NEW SOURCE PERMITS REGISTRATION 128539
AIR NEW SOURCE PERMITS REGISTRATION 137118
AIR NEW SOURCE PERMITS REGISTRATION 107096
AIR NEW SOURCE PERMITS REGISTRATION 112388
AIR NEW SOURCE PERMITS REGISTRATION 154387

AIR NEW SOURCE PERMITS REGISTRATION 153000
AIR NEW SOURCE PERMITS REGISTRATION 154192
AIR NEW SOURCE PERMITS PERMIT AMOC64
AIR NEW SOURCE PERMITS REGISTRATION 150427
AIR NEW SOURCE PERMITS REGISTRATION 162811
AIR NEW SOURCE PERMITS REGISTRATION 162916
AIR NEW SOURCE PERMITS REGISTRATION 162330
AIR NEW SOURCE PERMITS REGISTRATION 163344
AIR NEW SOURCE PERMITS REGISTRATION 163502
AIR NEW SOURCE PERMITS REGISTRATION 163531
AIR NEW SOURCE PERMITS REGISTRATION 163501
AIR NEW SOURCE PERMITS REGISTRATION 163729
AIR NEW SOURCE PERMITS REGISTRATION 148170
AIR NEW SOURCE PERMITS REGISTRATION 147282
AIR NEW SOURCE PERMITS REGISTRATION 147180

AIR NEW SOURCE PERMITS REGISTRATION 146876
AIR NEW SOURCE PERMITS EPA PERMIT GHGPSDTX160
AIR NEW SOURCE PERMITS REGISTRATION 156653
AIR NEW SOURCE PERMITS REGISTRATION 160437
AIR NEW SOURCE PERMITS REGISTRATION 159427
AIR NEW SOURCE PERMITS REGISTRATION 161663
AIR NEW SOURCE PERMITS REGISTRATION 155252
AIR NEW SOURCE PERMITS REGISTRATION 157983
AIR NEW SOURCE PERMITS REGISTRATION 154819

PETROLEUM STORAGE TANK REGISTRATION REGISTRATION 90505
UNDERGROUND INJECTION CONTROL PERMIT WDW004
UNDERGROUND INJECTION CONTROL PERMIT WDW029
UNDERGROUND INJECTION CONTROL PERMIT WDW105
UNDERGROUND INJECTION CONTROL PERMIT WDW142
UNDERGROUND INJECTION CONTROL PERMIT WDW144
WASTEWATER EPA ID TX0006050

POLLUTION PREVENTION PLANNING ID NUMBER P06852

INDUSTRIAL AND HAZARDOUS WASTE PERMIT 50393
INDUSTRIAL AND HAZARDOUS WASTE SOLID WASTE REGISTRATION # (SWR) 87449
TAX RELIEF ID NUMBER 20128
TAX RELIEF ID NUMBER 17849
TAX RELIEF ID NUMBER 16589
TAX RELIEF ID NUMBER 16734
TAX RELIEF ID NUMBER 16590

AIR NEW SOURCE PERMITS REGISTRATION 151197
AIR NEW SOURCE PERMITS REGISTRATION 151513
AIR NEW SOURCE PERMITS REGISTRATION 150775
AIR NEW SOURCE PERMITS REGISTRATION 162812
AIR NEW SOURCE PERMITS REGISTRATION 162112
AIR NEW SOURCE PERMITS REGISTRATION 161725
AIR NEW SOURCE PERMITS REGISTRATION 163343
AIR NEW SOURCE PERMITS REGISTRATION 163737
AIR NEW SOURCE PERMITS REGISTRATION 162329
AIR NEW SOURCE PERMITS REGISTRATION 163730
AIR NEW SOURCE PERMITS REGISTRATION 163030
AIR NEW SOURCE PERMITS REGISTRATION 162917
AIR NEW SOURCE PERMITS REGISTRATION 144089
AIR NEW SOURCE PERMITS REGISTRATION 146503
AIR NEW SOURCE PERMITS EPA PERMIT GHGPSDTX145M1

AIR NEW SOURCE PERMITS REGISTRATION 150425
AIR NEW SOURCE PERMITS REGISTRATION 160436
AIR NEW SOURCE PERMITS REGISTRATION 159010
AIR NEW SOURCE PERMITS REGISTRATION 160761
AIR NEW SOURCE PERMITS REGISTRATION 159739
AIR NEW SOURCE PERMITS REGISTRATION 160438
AIR NEW SOURCE PERMITS REGISTRATION 154311
AIR NEW SOURCE PERMITS REGISTRATION 156654

PETROLEUM STORAGE TANK REGISTRATION REGISTRATION 24717

IHW CORRECTIVE ACTION SOLID WASTE REGISTRATION # (SWR) 30079

UNDERGROUND INJECTION CONTROL PERMIT WDW028
UNDERGROUND INJECTION CONTROL PERMIT WDW030
UNDERGROUND INJECTION CONTROL PERMIT WDW106
UNDERGROUND INJECTION CONTROL PERMIT WDW143
WASTEWATER PERMIT WQ0000476000
AIR EMISSIONS INVENTORY ACCOUNT NUMBER VC0008Q

INDUSTRIAL AND HAZARDOUS WASTE EPA ID TXR000057968
INDUSTRIAL AND HAZARDOUS WASTE PERMIT 50056
TAX RELIEF ID NUMBER 16591

TAX RELIEF ID NUMBER 16929
TAX RELIEF ID NUMBER 23356
TAX RELIEF ID NUMBER 20129
TAX RELIEF ID NUMBER 18582
TAX RELIEF ID NUMBER 16592

Compliance History Period: September 01, 2015 to August 31, 2020 **Rating Year:** 2020 **Rating Date:** 09/01/2020

Date Compliance History Report Prepared: January 11, 2021

Agency Decision Requiring Compliance History: Enforcement

Component Period Selected: January 11, 2016 to January 11, 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? YES
- 2) Has there been a (known) change in ownership/operator of the site during the compliance period? NO

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

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

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

- 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)
Rqmt 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)
Rqmt Prov: PP. VIII. A. Monitoring and Testing Req. 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
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
- 2 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
- 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

Rqmt 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

4 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

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	January 17, 2017	(1397143)
Item 24	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	(1507707)
Item 56	July 18, 2018	(1514024)
Item 57	August 02, 2018	(1506476)
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: 04/30/2020 (1660104)
Self Report? YES Classification: Moderate
Citation: 2D TWC Chapter 26, SubChapter A 26.121(a)
30 TAC Chapter 305, SubChapter F 305.125(1)
Description: Failure to meet the limit for one or more permit parameter

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

Date: 05/29/2020 (1644596)

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
STC 15 OP
STC 4E OP

Description: Failure to comply with time requirements for planned continuous emissions monitoring system (CEMS) maintenance.

Self Report? NO Classification: Moderate

Citation: 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? NO Classification: Moderate

Citation: 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? 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 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? NO Classification: Moderate

Citation: 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 1A OP
STC 1E OP

Description: Failure to comply with 40 CFR Part 63, Subpart EEE.

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 6 PERMIT
STC 15 OP

Description: Failure to comply with special conditions of NSR 9560.

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 5B PERMIT
 STC 15 OP
 Description: Failure to comply with special conditions of NSR 9560.
 Self Report? 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: Failure to comply with 40 CFR Part 63, Subpart EEE.
 Self Report? NO Classification: Moderate
 Citation: 30 TAC Chapter 116, SubChapter B 116.115(b)(2)(F)
 30 TAC Chapter 116, SubChapter B 116.115(c)
 30 TAC Chapter 122, SubChapter B 122.143(4)
 5C THSC Chapter 382 382.085(b)
 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? 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

STC 15 OP
 STC 4E OP
 Description: Failure to meet hourly monitoring requirement for continuous demonstration of compliance.
 Self Report? NO Classification: Moderate
 Citation: 30 TAC Chapter 116, SubChapter B 116.115(b)(2)(F)
 30 TAC Chapter 116, SubChapter B 116.115(c)
 30 TAC Chapter 122, SubChapter B 122.143(4)
 5C THSC Chapter 382 382.085(b)
 GTC OP
 SC 1 PERMIT
 STC 15 OP
 Description: Failure to comply with the hourly N2O rate of the MAERT of NSR 812.

3

Date: 08/17/2020 (1659535)
 Self Report? NO Classification: Moderate
 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: Failure to comply with time limit usage of emergency engines.
 Self Report? NO Classification: Moderate
 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).
 Self Report? NO Classification: 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: Failure to prevent open-ended lines.
 Self Report? NO Classification: Moderate
 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(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 Classification: Moderate
 Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
 30 TAC Chapter 122, SubChapter B 122.143(4)
 5C THSC Chapter 382 382.085(b)
 FOP 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..
 Self Report? NO Classification: 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.
 Self Report? NO Classification: Moderate
 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.

4 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.

5 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)
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 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.

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(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

6 Date: 08/28/2020 (1624119)
 Self Report? NO Classification: Moderate

Citation: 30 TAC Chapter 101, SubChapter A 101.20(3)
 30 TAC Chapter 116, SubChapter B 116.115(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 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)
 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.

Self Report? NO 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)
 PSDTX 1448, SC 8(F) PERMIT
 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 Classification: Moderate

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.
 Self Report? NO Classification: Moderate

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.

Self Report? NO Classification: 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)
 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 Classification: Moderate

Citation: 30 TAC Chapter 122, SubChapter B 122.143(4)
 30 TAC Chapter 122, SubChapter B 122.145(2)

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

7 Date: 09/30/2020 (1693256)
Self Report? YES Classification: Moderate
Citation: 2D TWC Chapter 26, SubChapter A 26.121(a)
30 TAC Chapter 305, SubChapter F 305.125(1)
Description: Failure to meet the limit for one or more permit parameter

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)

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)

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)

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)

Description: Failed to capture Acids Waste tank annual emissions in the site Emissions Inventory (EI) since the 2016 EI, 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

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

G. Type of environmental management systems (EMSs):

N/A

H. Voluntary on-site compliance assessment dates:

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

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 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
- 2 Date: 04/18/2016 (1308014)
Self Report? NO Classification: Moderate
Citation: 30 TAC Chapter 101, SubChapter F 101.201(c)
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.
Self Report? NO Classification: Moderate
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 Classification: 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 Classification: Moderate
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 Classification: Moderate
Citation: 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.
Self Report? NO Classification: 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.
- 3 Date: 06/22/2016 (1329329)
Self Report? NO Classification: Minor
Citation: 30 TAC Chapter 290, SubChapter D 290.46(m)
Description: Failed to maintain the good working condition and general appearance of the system's facilities and equipment.
- 4 Date: 06/30/2016 (1359128)
Self Report? YES Classification: Moderate
Citation: 2D TWC Chapter 26, SubChapter A 26.121(a)
30 TAC Chapter 305, SubChapter F 305.125(1)
Description: Failure to meet the limit for one or more permit parameter

- 5 Date: 07/20/2016 (1349141)
 Self Report? NO Classification: 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)
 SC 7B PERMIT
 Description: Failure to maintain CEMS data to demonstrate that the calibration drift did not exceed two times the performance specifications.
 Self Report? NO Classification: 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: Failure to complete a required monthly visible emissions observation.
 Self Report? NO Classification: 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)
 SC 12B PERMIT
 Description: Failure to record the HCL Tank scrubber flow rate.
 Self Report? NO Classification: 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)
 SC 11F PERMIT
 Description: Failure to monitor two valves.
 Self Report? NO Classification: Moderate
 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? NO Classification: 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)
 SC 6D PERMIT
 Description: Failure to maintain minimum natural gas flow.
- 6 Date: 08/03/2016 (1349369)
 Self Report? NO Classification: 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.
- 7 Date: 08/05/2016 (1349366)
 Self Report? NO Classification: Moderate
 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)
 VIII.A Monitoring & Testing Requirements 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.
- 8 Date: 08/23/2016 (1338121)
 Self Report? NO Classification: 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 Classification: Moderate
 Citation: 30 TAC Chapter 305, SubChapter F 305.125(1)
 Effluent Limits & Mon. RQMTs; Pg. 2q PERMIT
 Description: Failed to prevent the unauthorized discharge of floating solids.
 Self Report? NO Classification: Moderate
 Citation: 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).

9 Date: 08/26/2016 (1349177)

Self Report? NO 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)
FOP No. O-1904, STC 24 OP
NSR No. 7186, SC 20 PERMIT

Description: Failure to conduct VOC monitoring.
Self Report? NO Classification: 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)
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 Classification: Moderate

Citation: 30 TAC Chapter 111, SubChapter A 111.111(a)(4)(A)(ii)
30 TAC Chapter 122, SubChapter B 122.143(4)
5C THSC Chapter 382 382.085(b)
FOP No. O-1904, STC 1 OP

Description: Failure to conduct visible emission monitoring.
Self Report? NO Classification: 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 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)
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.

10 Date: 08/30/2016 (1349175)

Self Report? NO Classification: Moderate

Citation: 30 TAC Chapter 116, SubChapter B 116.115(b)(2)(F)
30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)
5C THSC Chapter 382 382.085(b)
FOP No. O-1415 STC 17 OP
NSR No. 810, SC1 PERMIT

Description: Failure to prevent the exceedance of the Maximum Allowable Emission Rates.
Self Report? NO Classification: Moderate

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.
Self Report? NO Classification: Moderate

Citation: 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: Failure to conduct visible emission observations.
Self Report? NO Classification: Moderate

Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
 30 TAC Chapter 122, SubChapter B 122.143(4)
 5C THSC Chapter 382 382.085(b)
 FOP No. O-1415, STC 17 OP
 NSR No. 20011, SC 8 PERMIT

Description: Failure to conduct audio, olfactory, and visual checks (AVO).
 Self Report? NO Classification: Minor

Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
 30 TAC Chapter 122, SubChapter B 122.143(4)
 5C THSC Chapter 382 382.085(b)
 FOP No. O-1415, STC 17 OP
 NSR No. 20011, SC 7E PERMIT
 NSR No. 810, SC 7E PERMIT

Description: Failure to prevent fugitive emissions from Open Ended Lines (OEL).
 Self Report? NO Classification: Moderate

Citation: 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)
 FOP No. O-1415, STC 18 OP

Description: Failure to prevent the exceedance of the Maximum Allowable Emission Rates.
 Self Report? NO Classification: Moderate

Citation: 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.

11 Date: 08/31/2016 (1355247)

Self Report? NO Classification: Minor

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.
 Self Report? NO Classification: Minor

Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
 30 TAC Chapter 122, SubChapter B 122.143(4)
 5C THSC Chapter 382 382.085(b)
 GC 1 PERMIT
 STC 17 OP

Description: Failure to comply with the requirements listed in an applicable state permit.
 Self Report? NO Classification: Minor

Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
 30 TAC Chapter 122, SubChapter B 122.143(4)
 5C THSC Chapter 382 382.085(b)
 GC 5 PERMIT
 STC 17 OP

Description: Failure to perform sampling for natural gas sulfur content.
 Self Report? NO Classification: Minor

Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
 30 TAC Chapter 122, SubChapter B 122.143(4)
 5C THSC Chapter 382 382.085(b)
 GC 10 PERMIT
 STC 17 OP

Description: Failure to perform monitoring on two connectors.
 Self Report? NO Classification: Minor

Citation: 30 TAC Chapter 101, SubChapter A 101.20(1)
 30 TAC Chapter 116, SubChapter B 116.115(c)
 30 TAC Chapter 122, SubChapter B 122.143(4)
 40 CFR Chapter 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).
 Self Report? NO Classification: Minor

Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
 30 TAC Chapter 122, SubChapter B 122.143(4)
 5C THSC Chapter 382 382.085(b)
 SC 1 PERMIT
 STC 17 PERMIT

Description: Failure to comply with the requirements listed in an applicable state permit.

Self Report? NO Classification: Minor
 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.

Self Report? NO Classification: Minor
 Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
 30 TAC Chapter 122, SubChapter B 122.143(4)
 5C THSC Chapter 382 382.085(b)
 SC 5 PERMIT
 STC 17 PERMIT
 Description: Failure to comply with the requirements listed in an applicable state permit.

Self Report? NO Classification: Minor
 Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
 30 TAC Chapter 122, SubChapter B 122.143(4)
 5C THSC Chapter 382 382.085(b)
 SC 1 PERMIT
 STC 17 OP
 Description: Failure to comply with the requirements listed in an applicable state permit.

Self Report? NO Classification: Minor
 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.

Self Report? NO Classification: Minor
 Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
 30 TAC Chapter 122, SubChapter B 122.143(4)
 5C THSC Chapter 382 382.085(b)
 SC 17B PERMIT
 STC 17 OP
 Description: Failure to conduct audio, olfactory, and visual checks (AVO).

Self Report? NO Classification: Minor
 Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
 30 TAC Chapter 122, SubChapter B 122.143(4)
 5C THSC Chapter 382 382.085(b)
 SC 8C PERMIT
 STC 17 OP
 Description: Failure to comply with the requirements listed in an applicable state permit.

Self Report? NO Classification: Minor
 Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
 30 TAC Chapter 122, SubChapter B 122.143(4)
 5C THSC Chapter 382 382.085(b)
 SC 1 PERMIT
 STC 17 OP
 Description: Failure to comply with the requirements listed in an applicable state permit.

12 Date: 09/30/2016 (1357771)
 Self Report? NO 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)
 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.

13 Date: 11/29/2016 (1370328)
 Self Report? NO Classification: Moderate
 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
 Permit PERMIT
 Description: 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.

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.

- 14 Date: 12/16/2016 (1357800)
Self Report? NO Classification: Moderate
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)
Federal Operating Permit No. O-1415 OP
Description: 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? NO Classification: Moderate
Citation: 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.
- 15 Date: 01/16/2017 (1370561)
Self Report? NO Classification: Moderate
Citation: 30 TAC Chapter 101, SubChapter F 101.201(c)
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.
- Self Report? NO Classification: Moderate
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 Classification: 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 Classification: Moderate
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 Classification: Moderate
Citation: 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.
- Self Report? NO Classification: 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.
- 16 Date: 01/20/2017 (1370039)
Self Report? NO Classification: Moderate
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
PP.III.D. General Inspection Requirement 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.

17 Date: 02/28/2017 (1411128)
Self Report? YES Classification: Moderate
Citation: 2D TWC Chapter 26, SubChapter A 26.121(a)
30 TAC Chapter 305, SubChapter F 305.125(1)
Description: Failure to meet the limit for one or more permit parameter

18 Date: 03/14/2017 (1357499)
Self Report? NO Classification: 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 Classification: 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
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 Classification: 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 Classification: 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 unspecified VOC from the ADN Facility (EPNs 10FLR002, 10FLR004, 10FLR001, 10FLR005, 10FLR003A, and 10FLR003). The event occurred

Self Report? NO Classification: 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)
GTC OP
STC 15 OP

Description: 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? NO Classification: Moderate

Citation: 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

Description: 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.

19 Date: 04/19/2017 (1402112)

Self Report? NO Classification: 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)
PP.VIII.A Monitoring and Testing Require PERMIT

Description: Failed to perform corrosion monitoring as required.

20 Date: 04/19/2017 (1402109)

Self Report? NO Classification: 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)
PP.VIII.A Monitoring and Testing Require PERMIT

Description: Failed to perform corrosion monitoring as required.

21 Date: 05/26/2017 (1409010)

Self Report? NO Classification: 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)
NSR PERMIT
PSD PERMIT

Description: 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 SARM, released unauthorized emissions in the amount of 2892 lbs of ammonia, 37 lbs of hexamethylenediamine, 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

22 Date: 06/30/2017 (1439832)

Self Report? YES Classification: Moderate

Citation: 2D TWC Chapter 26, SubChapter A 26.121(a)
30 TAC Chapter 305, SubChapter F 305.125(1)

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

23 Date: 07/07/2017 (1422568)

Self Report? NO Classification: Moderate

Citation: 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.

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Date: 07/21/2017 (1424158)

Self Report? NO Classification: Moderate

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)
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 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.

Self Report? NO Classification: Moderate

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)
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 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.

Self Report? NO Classification: Moderate

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.

Self Report? NO Classification: Moderate

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.

Self Report? NO Classification: Moderate

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.

25

Date: 07/28/2017 (1420813)

Self Report? NO Classification: Moderate

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 Code of Federal Regulations 63.1217(a)(5)(i).

Self Report? NO Classification: Moderate

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.

Self Report? NO Classification: Moderate

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)
 5C THSC Chapter 382 382.085(b)

Description: 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.

26 Date: 08/31/2017 (1429815)

Self Report? NO Classification: Moderate

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
 PERMIT 7186, NSR No. 7186, SC 4 PERMIT

Description: Failure to update the startup, shutdown, and malfunction plan (SSMP).

Self Report? NO Classification: 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 Classification: Moderate

Citation: 30 TAC Chapter 111, SubChapter A 111.111(a)(4)(A)(ii)
 30 TAC Chapter 122, SubChapter B 122.143(4)
 5C THSC Chapter 382 382.085(b)
 PERMIT 1904, FOP No. O-1904, STC 1A OP

Description: Failure to conduct visible emission monitoring.

Self Report? NO Classification: 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)
 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 Classification: Moderate

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)
 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 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)
 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 Classification: 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)

Description: Failure to report all instances of a deviation.

Self Report? NO Classification: Moderate

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? NO 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)
 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

Description: Failure to monitor valves, connectors, and replacements for leaking components.

27

Date: 12/11/2017 (1430479)

Self Report? NO Classification: 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 Classification: Minor

Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
 30 TAC Chapter 122, SubChapter B 122.143(4)
 5C THSC Chapter 382 382.085(b)
 SC 7(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 Classification: 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)
 STC 16 OP

Description: Failure to maintain sufficient records of surface coat activities.

Self Report? NO Classification: Moderate

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 Classification: Moderate

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)
 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.

Self Report? NO Classification: Moderate

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)
 SC 1 PERMIT

Description: Failure to prevent unauthorized emissions to the atmosphere during non-reportable (recordable) emissions events.

Self Report? NO Classification: Moderate

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

Description: 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 event.

Self Report? NO Classification: 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: 01/31/2018 (1486758)

Self Report? YES Classification: Moderate

Citation: 2D TWC Chapter 26, SubChapter A 26.121(a)
30 TAC Chapter 305, SubChapter F 305.125(1)

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

29 Date: 02/28/2018 (1490435)

Self Report? YES Classification: Moderate

Citation: 2D TWC Chapter 26, SubChapter A 26.121(a)
30 TAC Chapter 305, SubChapter F 305.125(1)

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

30 Date: 04/10/2018 (1478976)

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)
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 basis from February 1, 2017 through January 31, 2018.

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)
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 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)
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 Date: 06/29/2018 (1483974)

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.

Self Report? NO 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.

Self Report? NO Classification: Minor
Citation: 30 TAC Chapter 305, SubChapter F 305.125(1)
Monitoring Requirements No. 2, Pg. 4 PERMIT
Description: Failed to accurately accomplish in a representative manner all measurements, tests and calculations.
Self Report? NO Classification: Minor
Citation: 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
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.

32 Date: 07/11/2018 (1489984)

Self Report? NO Classification: Minor
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.
Self Report? NO Classification: Minor
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.
Self Report? NO Classification: Minor
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.
Self Report? NO Classification: Moderate
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.
Self Report? NO Classification: Minor
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.

33 Date: 07/16/2018 (1489978)

Self Report? NO Classification: Moderate
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)

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? NO Classification: 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)
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 Classification: Moderate

Citation: 30 TAC Chapter 111, SubChapter A 111.111(a)(4)(A)(ii)
30 TAC Chapter 122, SubChapter B 122.143(4)
5C THSC Chapter 382 382.085(b)
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 Classification: Minor

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.

34 Date: 10/24/2018 (1512369)

Self Report? NO Classification: 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 unspecified 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).

35 Date: 10/31/2018 (1541444)

Self Report? YES Classification: Moderate

Citation: 2D TWC Chapter 26, SubChapter A 26.121(a)
30 TAC Chapter 305, SubChapter F 305.125(1)

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

36 Date: 11/30/2018 (1545228)

Self Report? YES Classification: Moderate

Citation: 2D TWC Chapter 26, SubChapter A 26.121(a)
30 TAC Chapter 305, SubChapter F 305.125(1)

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

37 Date: 01/11/2019 (1500318)

Self Report? NO Classification: Moderate

Citation: 30 TAC Chapter 106, SubChapter S 106.433(8)(B)

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 Classification: 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 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)
 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 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)
 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 Classification: 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 Classification: Moderate

Citation: 30 TAC Chapter 122, SubChapter B 122.143(4)
 30 TAC Chapter 122, SubChapter B 122.145(2)
 5C THSC Chapter 382 382.085(b)
 GTCs OP

Description: Failure to report all instances of deviations.

38 Date: 02/04/2019 (1540328)

Self Report? NO Classification: 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)
 PSDTX1416, Special Condition 1 PERMIT

Description: Failure to prevent unauthorized emissions during an emissions event that occurred on September 14, 2018; TCEQ/STEERS Incident No. 292168.

39 Date: 06/19/2019 (1557608)

Self Report? NO Classification: 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 Classification: Moderate

Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
 5C THSC Chapter 382 382.085(b)
 SC No. 3 PERMIT

Description: Failure to prevent excess opacity to the atmosphere during an emissions event that occurred on April 11, 2018; TCEQ/STEERS Incident No. 282672.

40 Date: 06/26/2019 (1571573)

Self Report? NO Classification: Moderate

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)
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.

41 Date: 07/31/2019 (1599484)
Self Report? YES Classification: Moderate
Citation: 2D TWC Chapter 26, SubChapter A 26.121(a)
30 TAC Chapter 305, SubChapter F 305.125(1)
Description: Failure to meet the limit for one or more permit parameter

42 Date: 08/05/2019 (1578969)
Self Report? NO Classification: 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? NO 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 265.171
Description: Failed to ensure a container holding a hazardous waste (e.g., severe rusting, apparent structural defects) is in good condition.

Self Report? NO Classification: Moderate
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 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 ensure a container storing hazardous waste is always closed except when it is necessary to add or remove waste.

Self Report? NO Classification: Minor
Citation: 30 TAC Chapter 335, SubChapter C 335.69(e)
40 CFR Chapter 262, SubChapter I, PT 262, SubPT C 262.34(c)(2)
Description: Failed to ensure the container holding excess amount of hazardous waste marked with the beginning date of excess accumulation.

Self Report? NO Classification: 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? NO Classification: Minor
Citation: 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 Classification: 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 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).

43 Date: 08/23/2019 (1582081)
Self Report? NO Classification: Moderate
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.

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)
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.

Self Report? NO Classification: Moderate

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)
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.

Self Report? NO Classification: Moderate

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.

Self Report? NO Classification: Moderate

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 Classification: 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 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 Classification: 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 13, 2019.

Self Report? NO Classification: Moderate

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.

Self Report? NO Classification: Moderate

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.

Self Report? NO Classification: Moderate

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.

Self Report? NO Classification: Moderate

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.

44 Date: 08/30/2019 (1590970)

Self Report? NO Classification: 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.

Self Report? NO Classification: 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 63.171(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.

Self Report? NO Classification: Moderate

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.

Self Report? NO Classification: Moderate

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).

Self Report? NO Classification: Moderate

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 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 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.

45 Date: 08/30/2019 (1557529)

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 1, 10, 14 OP

GTC OP
STC 11 OP
STC 15 OP
STC 25 OP

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 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 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
STC 7(D) OP

Description: Invista failed to comply with NSR 813 STC 7(C).

Self Report? NO Classification: 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
STC 3 OP

Description: 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 eight occasions.

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 1, 10, 14 OP
GTC OP
STC 15 OP
STC 6(D) OP

Description: 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? NO Classification: Moderate
Citation: 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: Invista failed to abide by 30 TAC §117.4205.

Self Report? NO Classification: Moderate
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 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 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.

Self Report? NO Classification: Moderate
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 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 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 Classification: 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 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 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.

Self Report? NO Classification: Moderate
Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)
40 CFR Chapter 60, SubChapter C, PT 60, SubPT D 60.44
5C THSC Chapter 382 382.085(b)
GTC 1, 10, 14 OP
GTC OP
STC 15 OP
STC 5(A) OP

Description: Invista failed to abide by NOx emissions limits required by 40 CFR 60.44.
Self Report? NO Classification: 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.
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 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.

Self Report? NO 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 13 OP
STC 3 OP

Description: Invista failed to maintain monitoring records

46 Date: 08/31/2019 (1606389)
Self Report? YES Classification: Moderate
Citation: 2D TWC Chapter 26, SubChapter A 26.121(a)
30 TAC Chapter 305, SubChapter F 305.125(1)
Description: Failure to meet the limit for one or more permit parameter

47* Date: 10/31/2019 (1619049)
Self Report? YES Classification: Moderate
Citation: 2D TWC Chapter 26, SubChapter A 26.121(a)
30 TAC Chapter 305, SubChapter F 305.125(1)
Description: Failure to meet the limit for one or more permit parameter

48* Date: 12/31/2019 (1634042)
Self Report? YES Classification: Moderate
Citation: 2D TWC Chapter 26, SubChapter A 26.121(a)
30 TAC Chapter 305, SubChapter F 305.125(1)
Description: Failure to meet the limit for one or more permit parameter

49* Date: 01/03/2020 (1605279)
Self Report? NO Classification: 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.

50* Date: 04/30/2020 (1660104)

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

51* Date: 05/29/2020 (1644596)
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
STC 15 OP
STC 4E OP
Description: Failure to comply with time requirements for planned continuous emissions monitoring system (CEMS) maintenance.

Self Report? NO Classification: Moderate
Citation: 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? NO Classification: Moderate
Citation: 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? 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 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? NO Classification: Moderate
Citation: 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 1A OP
STC 1E OP
Description: Failure to comply with 40 CFR Part 63, Subpart EEE.

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 6 PERMIT
STC 15 OP

Description: Failure to comply with special conditions of NSR 9560.
 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 5B PERMIT
 STC 15 OP

Description: Failure to comply with special conditions of NSR 9560.
 Self Report? 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: Failure to comply with 40 CFR Part 63, Subpart EEE.
 Self Report? NO Classification: Moderate
 Citation: 30 TAC Chapter 116, SubChapter B 116.115(b)(2)(F)
 30 TAC Chapter 116, SubChapter B 116.115(c)
 30 TAC Chapter 122, SubChapter B 122.143(4)
 5C THSC Chapter 382 382.085(b)
 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? 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
 STC 15 OP
 STC 4E OP

Description: Failure to meet hourly monitoring requirement for continuous demonstration of compliance.

Self Report? NO Classification: Moderate

Citation: 30 TAC Chapter 116, SubChapter B 116.115(b)(2)(F)
 30 TAC Chapter 116, SubChapter B 116.115(c)
 30 TAC Chapter 122, SubChapter B 122.143(4)
 5C THSC Chapter 382 382.085(b)
 GTC OP
 SC 1 PERMIT
 STC 15 OP

Description: Failure to comply with the hourly N2O rate of the MAERT of NSR 812.

52* Date: 08/17/2020 (1659535)

Self Report? NO Classification: Moderate

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: Failure to comply with time limit usage of emergency engines.

Self Report? NO Classification: Moderate

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).

Self Report? NO Classification: 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: Failure to prevent open-ended lines.

Self Report? NO Classification: Moderate

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(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 Classification: Moderate

Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
 30 TAC Chapter 122, SubChapter B 122.143(4)
 5C THSC Chapter 382 382.085(b)
 FOP 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..

Self Report? NO Classification: 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.

Self Report? NO Classification: Moderate
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.

53* 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.

54* 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)
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 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.
 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(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

55* Date: 08/28/2020 (1624119)
 Self Report? NO Classification: Moderate
 Citation: 30 TAC Chapter 101, SubChapter A 101.20(3)
 30 TAC Chapter 116, SubChapter B 116.115(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 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)
 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.
 Self Report? NO 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)
 PSDTX 1448, SC 8(F) PERMIT
 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 Classification: Moderate
 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.
 Self Report? NO Classification: Moderate
 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.
 Self Report? NO Classification: 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)
 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 Classification: Moderate
Citation: 30 TAC Chapter 122, SubChapter B 122.143(4)
30 TAC Chapter 122, SubChapter B 122.145(2)
5C THSC Chapter 382 382.085(b)
GT&C OP
Description: Failure to report all instances of deviations.

56 Date: 09/30/2020 (1693256)
Self Report? YES Classification: Moderate
Citation: 2D TWC Chapter 26, SubChapter A 26.121(a)
30 TAC Chapter 305, SubChapter F 305.125(1)
Description: Failure to meet the limit for one or more permit parameter

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

Item 41*	February 16, 2017**	(1377914)
Item 42*	February 20, 2017**	(1370290)
Item 43	March 09, 2017**	(1411128)
Item 44	March 14, 2017**	(1357499)
Item 45*	March 22, 2017**	(1401605)
Item 46*	April 11, 2017**	(1383077)
Item 47*	April 14, 2017**	(1402007)
Item 48	April 19, 2017**	(1402109)
Item 49	April 21, 2017**	(1402111)
Item 50*	May 18, 2017**	(1425220)
Item 51	May 19, 2017**	(1409010)
Item 52*	May 25, 2017**	(1400959)
Item 53*	June 01, 2017**	(1416000)
Item 54*	June 13, 2017**	(1416112)
Item 55	July 07, 2017**	(1422568)
Item 56*	July 16, 2017**	(1423925)
Item 57	July 19, 2017**	(1439832)
Item 58*	July 24, 2017**	(1396487)
Item 59	July 28, 2017**	(1420813)
Item 60*	August 01, 2017**	(1429972)
Item 61*	August 04, 2017**	(1401463)
Item 62*	August 18, 2017**	(1443520)
Item 63	August 21, 2017**	(1424158)
Item 64*	August 29, 2017**	(1435824)
Item 65	August 31, 2017**	(1429815)
Item 66*	September 12, 2017**	(1436937)
Item 67*	September 20, 2017**	(1450147)
Item 68*	October 18, 2017**	(1455967)
Item 69*	November 14, 2017**	(1461448)
Item 70	December 11, 2017**	(1430479)
Item 71*	December 14, 2017**	(1442855)
Item 72*	December 19, 2017**	(1467827)
Item 73*	January 16, 2018**	(1474532)
Item 74	February 16, 2018**	(1486758)
Item 75	March 19, 2018**	(1490435)
Item 76*	April 06, 2018**	(1435175)
Item 77*	April 18, 2018**	(1493672)
Item 78*	May 04, 2018**	(1482739)
Item 79*	May 17, 2018**	(1500590)
Item 80	May 24, 2018**	(1478976)
Item 81*	June 11, 2018**	(1486276)
Item 82*	June 14, 2018**	(1507707)

Item 83	June 29, 2018**	(1483974)
Item 84	July 11, 2018**	(1489984)
Item 85*	July 18, 2018**	(1514024)
Item 86*	August 02, 2018**	(1506476)
Item 87	August 17, 2018**	(1489978)
Item 88*	August 20, 2018**	(1520086)
Item 89*	August 27, 2018**	(1512265)
Item 90	September 05, 2018**	(1512818)
Item 91*	September 20, 2018**	(1527251)
Item 92*	September 28, 2018**	(1513672)
Item 93*	October 01, 2018**	(1513685)
Item 94*	October 11, 2018**	(1519563)
Item 95*	October 17, 2018**	(1533609)
Item 96	October 24, 2018**	(1512369)
Item 97	November 14, 2018**	(1541444)
Item 98*	November 29, 2018**	(1525087)
Item 99	December 19, 2018**	(1545228)
Item 100*	January 14, 2019**	(1532406)
Item 101*	January 17, 2019**	(1559659)
Item 102*	January 24, 2019**	(1539278)
Item 103	January 29, 2019**	(1500318)
Item 104	February 01, 2019**	(1540328)
Item 105*	February 19, 2019**	(1559657)
Item 106*	February 25, 2019**	(1549775)
Item 107*	March 18, 2019**	(1559658)
Item 108*	March 29, 2019**	(1551550)
Item 109*	April 18, 2019**	(1571825)
Item 110*	May 20, 2019**	(1583259)
Item 111*	May 28, 2019**	(1569602)
Item 112*	May 30, 2019**	(1553423)
Item 113	June 19, 2019**	(1557608)
Item 114*	June 21, 2019**	(1575818)
Item 115	June 25, 2019**	(1571573)
Item 116	June 26, 2019**	(1571669)
Item 117*	June 28, 2019**	(1570896)
Item 118*	July 02, 2019**	(1578105)
Item 119*	July 11, 2019**	(1575847)
Item 120*	July 19, 2019**	(1593138)
Item 121*	August 01, 2019**	(1580321)
Item 122*	August 07, 2019**	(1579874)
Item 123	August 08, 2019**	(1578969)
Item 124	August 15, 2019**	(1599484)

Item 125	August 23, 2019**	(1582081)
Item 126	August 29, 2019**	(1590970)
Item 127	August 30, 2019**	(1557529)
Item 128	September 18, 2019**	(1606389)
Item 129*	October 17, 2019**	(1613235)
Item 130*	November 01, 2019**	(1604022)
Item 131	November 19, 2019**	(1619049)
Item 132	December 12, 2019**	(1604859)
Item 133*	December 19, 2019**	(1626401)
Item 134	January 16, 2020**	(1634042)
Item 135*	February 18, 2020**	(1640661)
Item 136*	March 18, 2020**	(1647181)
Item 137	March 27, 2020**	(1623002)
Item 138*	April 17, 2020**	(1653517)
Item 139	May 18, 2020**	(1660104)
Item 140*	May 27, 2020**	(1651341)
Item 141	May 29, 2020**	(1644596)
Item 142*	June 18, 2020**	(1666608)
Item 143*	June 26, 2020**	(1657712)
Item 144*	June 29, 2020**	(1658245)
Item 145*	July 16, 2020**	(1673565)
Item 146*	July 29, 2020**	(1665306)
Item 147*	August 05, 2020**	(1665506)
Item 148	August 14, 2020**	(1670152)
Item 149	August 17, 2020**	(1659535)
Item 150	August 20, 2020**	(1658179)
Item 151*	August 25, 2020**	(1650930)
Item 152	August 26, 2020**	(1670055)
Item 153	August 28, 2020**	(1624119)
Item 154*	August 31, 2020**	(1671744)
Item 155*	September 17, 2020	(1686909)
Item 156*	September 25, 2020	(1678190)
Item 157*	October 06, 2020	(1679294)
Item 158	October 15, 2020	(1693256)
Item 159*	October 20, 2020	(1679423)
Item 160*	October 26, 2020	(1684969)
Item 161*	November 13, 2020	(1685140)
Item 162*	November 17, 2020	(1686149)
Item 163*	December 03, 2020	(1691410)
Item 164*	December 09, 2020	(1678701)
Item 165*	December 15, 2020	(1691806)
Item 166	December 16, 2020	(1691809)

* No violations documented during this investigation

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

The TCEQ is committed to accessibility.

To request a more accessible version of this report, please contact the TCEQ Help Desk at (512) 239-4357.



Compliance History Report

Compliance History Report for CN602582231, RN102663671, Rating Year 2020 which includes Compliance History (CH) components from September 1, 2015, through August 31, 2020.

Customer, Respondent, or Owner/Operator: CN602582231, Inv Performance Surfaces, LLC **Classification:** SATISFACTORY **Rating:** 5.44
Regulated Entity: RN102663671, INV NYLON CHEMICALS AMERICAS VICTORIA SITE **Classification:** SATISFACTORY **Rating:** 7.65
Complexity Points: 52 **Repeat Violator:** NO
CH Group: 05 - Chemical Manufacturing
Location: 2695 OLD BLOOMINGTON RD NORTH NEAR VICTORIA, VICTORIA COUNTY, TX
TCEQ Region: REGION 14 - CORPUS CHRISTI

ID Number(s):

AIR OPERATING PERMITS PERMIT 1867
AIR OPERATING PERMITS PERMIT 1902
AIR OPERATING PERMITS ACCOUNT NUMBER VCA001A
PUBLIC WATER SYSTEM/SUPPLY REGISTRATION 2350014
AIR NEW SOURCE PERMITS PERMIT 810
AIR NEW SOURCE PERMITS PERMIT 813
AIR NEW SOURCE PERMITS REGISTRATION 7873
AIR NEW SOURCE PERMITS REGISTRATION 14751
AIR NEW SOURCE PERMITS PERMIT 31376
AIR NEW SOURCE PERMITS REGISTRATION 43301
AIR NEW SOURCE PERMITS REGISTRATION 43501
AIR NEW SOURCE PERMITS REGISTRATION 45256
AIR NEW SOURCE PERMITS ACCOUNT NUMBER VC0008Q
AIR NEW SOURCE PERMITS REGISTRATION 71504
AIR NEW SOURCE PERMITS REGISTRATION 56688
AIR NEW SOURCE PERMITS REGISTRATION 74109
AIR NEW SOURCE PERMITS REGISTRATION 76575
AIR NEW SOURCE PERMITS REGISTRATION 80416L
AIR NEW SOURCE PERMITS REGISTRATION 92605
AIR NEW SOURCE PERMITS EPA PERMIT PSDTX1079M1
AIR NEW SOURCE PERMITS REGISTRATION 91536
AIR NEW SOURCE PERMITS REGISTRATION 96200
AIR NEW SOURCE PERMITS REGISTRATION 98317
AIR NEW SOURCE PERMITS REGISTRATION 99179
AIR NEW SOURCE PERMITS REGISTRATION 141367
AIR NEW SOURCE PERMITS REGISTRATION 131067
AIR NEW SOURCE PERMITS REGISTRATION 119719
AIR NEW SOURCE PERMITS EPA PERMIT PSDTX1079M2
AIR NEW SOURCE PERMITS REGISTRATION 122193
AIR NEW SOURCE PERMITS EPA PERMIT GHGSPDX145
AIR NEW SOURCE PERMITS REGISTRATION 105728
AIR NEW SOURCE PERMITS REGISTRATION 111677
AIR NEW SOURCE PERMITS REGISTRATION 115101
AIR NEW SOURCE PERMITS REGISTRATION 122060
AIR NEW SOURCE PERMITS REGISTRATION 136474
AIR NEW SOURCE PERMITS EPA PERMIT PSDTX1448
AIR NEW SOURCE PERMITS REGISTRATION 111678
AIR NEW SOURCE PERMITS EPA PERMIT GHGSPDX13
AIR NEW SOURCE PERMITS REGISTRATION 134439
AIR NEW SOURCE PERMITS PERMIT AMOC58

AIR OPERATING PERMITS PERMIT 1415
AIR OPERATING PERMITS PERMIT 1904
AIR OPERATING PERMITS ACCOUNT NUMBER VC0008Q
AIR NEW SOURCE PERMITS PERMIT 809
AIR NEW SOURCE PERMITS PERMIT 812
AIR NEW SOURCE PERMITS PERMIT 7186
AIR NEW SOURCE PERMITS PERMIT 9560
AIR NEW SOURCE PERMITS PERMIT 23271
AIR NEW SOURCE PERMITS REGISTRATION 37067
AIR NEW SOURCE PERMITS REGISTRATION 43502
AIR NEW SOURCE PERMITS REGISTRATION 44234
AIR NEW SOURCE PERMITS REGISTRATION 47610
AIR NEW SOURCE PERMITS AFS NUM 4846900001
AIR NEW SOURCE PERMITS REGISTRATION 71789
AIR NEW SOURCE PERMITS REGISTRATION 73896
AIR NEW SOURCE PERMITS REGISTRATION 73898
AIR NEW SOURCE PERMITS EPA PERMIT PSDTX1079
AIR NEW SOURCE PERMITS REGISTRATION 89577
AIR NEW SOURCE PERMITS REGISTRATION 93064
AIR NEW SOURCE PERMITS REGISTRATION 92217
AIR NEW SOURCE PERMITS REGISTRATION 92339
AIR NEW SOURCE PERMITS REGISTRATION 102817
AIR NEW SOURCE PERMITS REGISTRATION 109746
AIR NEW SOURCE PERMITS REGISTRATION 103298
AIR NEW SOURCE PERMITS REGISTRATION 105010
AIR NEW SOURCE PERMITS REGISTRATION 111679
AIR NEW SOURCE PERMITS EPA PERMIT GHGSPDX129
AIR NEW SOURCE PERMITS REGISTRATION 131268
AIR NEW SOURCE PERMITS REGISTRATION 108018
AIR NEW SOURCE PERMITS REGISTRATION 138475
AIR NEW SOURCE PERMITS EPA PERMIT PSDTX1416
AIR NEW SOURCE PERMITS REGISTRATION 115157
AIR NEW SOURCE PERMITS REGISTRATION 122233
AIR NEW SOURCE PERMITS REGISTRATION 122834
AIR NEW SOURCE PERMITS REGISTRATION 106823
AIR NEW SOURCE PERMITS REGISTRATION 128539
AIR NEW SOURCE PERMITS REGISTRATION 137118
AIR NEW SOURCE PERMITS REGISTRATION 107096
AIR NEW SOURCE PERMITS REGISTRATION 112388
AIR NEW SOURCE PERMITS REGISTRATION 154387

AIR NEW SOURCE PERMITS REGISTRATION 151197
AIR NEW SOURCE PERMITS REGISTRATION 151513
AIR NEW SOURCE PERMITS REGISTRATION 162812
AIR NEW SOURCE PERMITS REGISTRATION 162112
AIR NEW SOURCE PERMITS REGISTRATION 161725
AIR NEW SOURCE PERMITS REGISTRATION 163343
AIR NEW SOURCE PERMITS REGISTRATION 163737
AIR NEW SOURCE PERMITS REGISTRATION 164298
AIR NEW SOURCE PERMITS REGISTRATION 163531
AIR NEW SOURCE PERMITS REGISTRATION 163501
AIR NEW SOURCE PERMITS REGISTRATION 163030
AIR NEW SOURCE PERMITS REGISTRATION 163881
AIR NEW SOURCE PERMITS REGISTRATION 144089
AIR NEW SOURCE PERMITS REGISTRATION 146503
AIR NEW SOURCE PERMITS EPA PERMIT
GHGPSDTX145M1
AIR NEW SOURCE PERMITS EPA PERMIT GHGPSDTX160
AIR NEW SOURCE PERMITS REGISTRATION 159010
AIR NEW SOURCE PERMITS REGISTRATION 160761
AIR NEW SOURCE PERMITS REGISTRATION 161663
AIR NEW SOURCE PERMITS REGISTRATION 155252
AIR NEW SOURCE PERMITS REGISTRATION 157983
AIR NEW SOURCE PERMITS REGISTRATION 154819

PETROLEUM STORAGE TANK REGISTRATION

REGISTRATION 90505
UNDERGROUND INJECTION CONTROL PERMIT WDW004
UNDERGROUND INJECTION CONTROL PERMIT WDW029
UNDERGROUND INJECTION CONTROL PERMIT WDW105
UNDERGROUND INJECTION CONTROL PERMIT WDW142
UNDERGROUND INJECTION CONTROL PERMIT WDW144
WASTEWATER EPA ID TX0006050

POLLUTION PREVENTION PLANNING ID NUMBER
P06852

INDUSTRIAL AND HAZARDOUS WASTE PERMIT 50393
INDUSTRIAL AND HAZARDOUS WASTE SOLID WASTE
REGISTRATION # (SWR) 87449
TAX RELIEF ID NUMBER 20128
TAX RELIEF ID NUMBER 17849
TAX RELIEF ID NUMBER 16589
TAX RELIEF ID NUMBER 16734
TAX RELIEF ID NUMBER 16590

AIR NEW SOURCE PERMITS REGISTRATION 154192
AIR NEW SOURCE PERMITS PERMIT AMOC64
AIR NEW SOURCE PERMITS REGISTRATION 162811
AIR NEW SOURCE PERMITS REGISTRATION 162916
AIR NEW SOURCE PERMITS REGISTRATION 162330
AIR NEW SOURCE PERMITS REGISTRATION 163344
AIR NEW SOURCE PERMITS REGISTRATION 163502
AIR NEW SOURCE PERMITS REGISTRATION 162329
AIR NEW SOURCE PERMITS REGISTRATION 163730
AIR NEW SOURCE PERMITS REGISTRATION 163880
AIR NEW SOURCE PERMITS REGISTRATION 163729
AIR NEW SOURCE PERMITS REGISTRATION 162917
AIR NEW SOURCE PERMITS REGISTRATION 147282
AIR NEW SOURCE PERMITS REGISTRATION 147180
AIR NEW SOURCE PERMITS REGISTRATION 146876

AIR NEW SOURCE PERMITS REGISTRATION 156653
AIR NEW SOURCE PERMITS REGISTRATION 160437
AIR NEW SOURCE PERMITS REGISTRATION 159739
AIR NEW SOURCE PERMITS REGISTRATION 160438
AIR NEW SOURCE PERMITS REGISTRATION 154311
AIR NEW SOURCE PERMITS REGISTRATION 156654

PETROLEUM STORAGE TANK REGISTRATION

REGISTRATION 24717
IHW CORRECTIVE ACTION SOLID WASTE REGISTRATION
(SWR) 30079
UNDERGROUND INJECTION CONTROL PERMIT WDW028
UNDERGROUND INJECTION CONTROL PERMIT WDW030
UNDERGROUND INJECTION CONTROL PERMIT WDW106
UNDERGROUND INJECTION CONTROL PERMIT WDW143
WASTEWATER PERMIT WQ0000476000
AIR EMISSIONS INVENTORY ACCOUNT NUMBER
VC0008Q
INDUSTRIAL AND HAZARDOUS WASTE EPA ID
TXR000057968
INDUSTRIAL AND HAZARDOUS WASTE PERMIT 50056
TAX RELIEF ID NUMBER 16591

TAX RELIEF ID NUMBER 16929
TAX RELIEF ID NUMBER 23356
TAX RELIEF ID NUMBER 20129
TAX RELIEF ID NUMBER 18582
TAX RELIEF ID NUMBER 16592

Compliance History Period: September 01, 2015 to August 31, 2020 **Rating Year:** 2020 **Rating Date:** 09/01/2020

Date Compliance History Report Prepared: May 12, 2021

Agency Decision Requiring Compliance History: Enforcement

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? | YES |
| 2) Has there been a (known) change in ownership/operator of the site during the compliance period? | NO |

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

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

- 1 Effective Date: 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)
- Rqmt 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)
- Rqmt Prov: PP. VIII. A. Monitoring and Testing Req. 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
- 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
- 2 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
- 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

Rqmt 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

4 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

C. Chronic excessive emissions events:

N/A

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

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, 2016	(1372253)
Item 12	September 30, 2016	(1363528)
Item 13	October 18, 2016	(1378430)
Item 14	October 25, 2016	(1364733)
Item 15	November 10, 2016	(1371863)
Item 16	November 17, 2016	(1384389)
Item 17	December 13, 2016	(1390527)
Item 18	January 17, 2017	(1397143)
Item 19	January 26, 2017	(1387943)
Item 20	February 14, 2017	(1393753)
Item 21	February 16, 2017	(1377914)
Item 22	February 20, 2017	(1370290)
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	May 18, 2017	(1425220)
Item 28	May 25, 2017	(1400959)
Item 29	June 01, 2017	(1416000)
Item 30	June 13, 2017	(1416112)
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, 2017	(1436937)
Item 39	September 20, 2017	(1450147)
Item 40	October 18, 2017	(1455967)
Item 41	November 14, 2017	(1461448)
Item 42	December 14, 2017	(1442855)
Item 43	December 19, 2017	(1467827)
Item 44	January 16, 2018	(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, 2018	(1527251)
Item 56	September 28, 2018	(1513672)
Item 57	October 01, 2018	(1513685)
Item 58	October 11, 2018	(1519563)
Item 59	October 17, 2018	(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 103	October 26, 2020	(1684969)
Item 104	November 12, 2020	(1712458)
Item 105	November 13, 2020	(1685140)
Item 106	November 17, 2020	(1686149)
Item 107	December 03, 2020	(1691410)
Item 108	December 09, 2020	(1678701)
Item 109	December 15, 2020	(1691806)
Item 110	December 16, 2020	(1712459)
Item 111	January 18, 2021	(1712460)
Item 112	March 03, 2021	(1703786)
Item 113	May 03, 2021	(1709524)
Item 114	May 04, 2021	(1710914)

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: 05/29/2020 (1644596)
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
 STC 15 OP
 STC 4E OP

Description: Failure to comply with time requirements for planned continuous emissions monitoring system (CEMS) maintenance.

Self Report? NO Classification: Moderate

Citation: 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? NO Classification: Moderate

Citation: 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? 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 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? NO Classification: Moderate

Citation: 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 1A OP
 STC 1E OP

Description: Failure to comply with 40 CFR Part 63, Subpart EEE.

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 6 PERMIT
 STC 15 OP

Description: Failure to comply with special conditions of NSR 9560.

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 5B PERMIT
 STC 15 OP

Description: Failure to comply with special conditions of NSR 9560.
Self Report? 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: Failure to comply with 40 CFR Part 63, Subpart EEE.
Self Report? NO Classification: Moderate
Citation: 30 TAC Chapter 116, SubChapter B 116.115(b)(2)(F)
30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)
5C THSC Chapter 382 382.085(b)
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? 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
STC 15 OP
STC 4E OP

Description: Failure to meet hourly monitoring requirement for continuous demonstration of compliance.
Self Report? NO Classification: Moderate

Citation: 30 TAC Chapter 116, SubChapter B 116.115(b)(2)(F)
30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)
5C THSC Chapter 382 382.085(b)
GTC OP
SC 1 PERMIT
STC 15 OP
Description: Failure to comply with the hourly N2O rate of the MAERT of NSR 812.

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Date: 08/17/2020 (1659535)
Self Report? NO Classification: Moderate
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: Failure to comply with time limit usage of emergency engines.
Self Report? NO Classification: Moderate
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).
Self Report? NO Classification: 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: Failure to prevent open-ended lines.
Self Report? NO Classification: Moderate
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(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 Classification: Moderate
Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)
5C THSC Chapter 382 382.085(b)
FOP 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..
Self Report? NO Classification: 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.
Self Report? NO Classification: Moderate
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.

- 3 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.
- 4 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)
 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 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.
- 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(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

5 Date: 08/28/2020 (1624119)
Self Report? NO Classification: Moderate

Citation: 30 TAC Chapter 101, SubChapter A 101.20(3)
30 TAC Chapter 116, SubChapter B 116.115(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 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)
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.

Self Report? NO 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)
PSDTX 1448, SC 8(F) PERMIT
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 Classification: Moderate

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.

Self Report? NO Classification: Moderate

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.

Self Report? NO Classification: 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)
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 Classification: Moderate

Citation: 30 TAC Chapter 122, SubChapter B 122.143(4)
30 TAC Chapter 122, SubChapter B 122.145(2)
5C THSC Chapter 382 382.085(b)
GT&C OP

Description: Failure to report all instances of deviations.

6 Date: 09/30/2020 (1693256)
Self Report? YES Classification: Moderate

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

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)

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)

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

J. Early compliance:

N/A

Sites Outside of Texas:

N/A

Component Appendices

Appendix A

All NOV's Issued During Component Period 5/12/2016 and 5/12/2021

- 1 Date: 06/22/2016 (1329329) Classification: Minor
Self Report? NO For Informational Purposes Only
Citation: 30 TAC Chapter 290, SubChapter D 290.46(m)
Description: Failed to maintain the good working condition and general appearance of the system's facilities and equipment.
- 2 Date: 06/30/2016 (1359128) 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
- 3 Date: 07/20/2016 (1349141) Classification: Moderate
Self Report? NO For Informational Purposes Only
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 7B PERMIT
Description: Failure to maintain CEMS data to demonstrate that the calibration drift did not exceed two times the performance specifications.
Classification: Moderate
Self Report? NO For Informational Purposes Only
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: Failure to complete a required monthly visible emissions observation.
Classification: Moderate
Self Report? NO For Informational Purposes Only
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.
Classification: Moderate
Self Report? NO For Informational Purposes Only
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.
Classification: Moderate
Self Report? NO For Informational Purposes Only
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.
Classification: Moderate
Self Report? NO For Informational Purposes Only
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 6D PERMIT
Description: Failure to maintain minimum natural gas flow.

4 Date: 08/03/2016 (1349369) Classification: Moderate
Self Report? NO For Informational Purposes Only
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.

5 Date: 08/05/2016 (1349366) Classification: Moderate
Self Report? NO For Informational Purposes Only
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)
VIII.A Monitoring & Testing Requirements 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.

6 Date: 08/23/2016 (1338121) Classification: Minor
Self Report? NO For Informational Purposes Only
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.
Classification: Moderate

Self Report? NO For Informational Purposes Only
Citation: 30 TAC Chapter 305, SubChapter F 305.125(1)
Effluent Limits & Mon. RQMTs; Pg. 2q PERMIT
Description: Failed to prevent the unauthorized discharge of floating solids.
Classification: Moderate

Self Report? NO For Informational Purposes Only
Citation: 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).

7 Date: 08/26/2016 (1349177) 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)
FOP No. O-1904, STC 24 OP
NSR No. 7186, SC 20 PERMIT
Description: Failure to conduct VOC monitoring.
Classification: Moderate

Self Report? NO For Informational Purposes Only
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)
FOP No. O-1904, STC 3 OP
Description: Failure to conduct an observation of a stationary vent at least once during a calendar quarter.
Classification: Moderate

Self Report? NO For Informational Purposes Only
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 No. O-1904, STC 1 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)
FOP No. O-1904, STC 24 OP
NSR No. 7186, SC 17 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 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.

8 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

Self Report? NO For Informational Purposes Only

Citation: 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: 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
NSR No. 810, SC 7E 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 106, SubChapter S 106.433(4)(B)
30 TAC Chapter 122, SubChapter B 122.143(4)
5C THSC Chapter 382 382.085(b)
FOP No. O-1415, STC 18 OP

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 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.

9

Date: 08/31/2016 (1355247)

Classification: Minor

Self Report? NO

For Informational Purposes Only

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

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)
GC 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)
GC 5 PERMIT
STC 17 OP

Description: Failure to perform sampling for natural gas sulfur content.

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)
GC 10 PERMIT
STC 17 OP

Description: Failure to perform monitoring on two connectors.

Classification: Minor

Self Report? NO

For Informational Purposes Only

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

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
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
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 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.

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

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 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
STC 17 OP

Description: Failure to comply with the requirements listed in an applicable state permit.

10

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 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.

11 Date: 11/29/2016 (1370328)

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)
5C THSC Chapter 382 382.085(b)
NSR PERMIT
Permit PERMIT

Description: 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. 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.

12 Date: 12/16/2016 (1357800)

Classification: Moderate

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)
Federal Operating Permit No. O-1415 OP

Description: 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.

Classification: Moderate

Self Report? NO For Informational Purposes Only

Citation: 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.

13 Date: 01/16/2017 (1370561)

Classification: Moderate

Self Report? NO For Informational Purposes Only

Citation: 30 TAC Chapter 101, SubChapter F 101.201(c)
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 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.

Classification: Moderate

Self Report? NO For Informational Purposes Only

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.

Classification: Moderate

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(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.
Classification: Moderate

Self Report? NO For Informational Purposes Only
Citation: 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.

14 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
PP.III.D. General Inspection Requirement 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.

15 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

16 Date: 03/14/2017 (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.

Classification: Moderate

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)
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 unspecified VOC from the ADN Facility (EPNs 10FLR002, 10FLR004, 10FLR001, 10FLR005, 10FLR003A, and 10FLR003). The event occurred

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)
GTC OP
STC 15 OP

Description: 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 unspecified 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

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)
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

Description: 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.

Self Report? NO For Informational Purposes Only

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)
PP.VIII.A Monitoring and Testing Require PERMIT

Description: Failed to perform corrosion monitoring as required.

18 Date: 04/19/2017 (1402109)

Classification: Moderate

Self Report? NO For Informational Purposes Only

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)
PP.VIII.A Monitoring and Testing Require PERMIT

Description: Failed to perform corrosion monitoring as required.

19 Date: 05/26/2017 (1409010)

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)
5C THSC Chapter 382 382.085(b)
NSR PERMIT
PSD PERMIT

Description: 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 hexamethylenediamine, 5 lbs of unspecified 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

20 Date: 06/30/2017 (1439832)

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

21 Date: 07/07/2017 (1422568)

Classification: Moderate

Self Report? NO For Informational Purposes Only

Citation: 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.

22 Date: 07/21/2017 (1424158)

Classification: Moderate

Self Report? NO For Informational Purposes Only

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)
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 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)
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 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.

23

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 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

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)
5C THSC Chapter 382 382.085(b)
Description: 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.

24

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
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. O-1904.
Classification: Moderate

Self Report? NO For Informational Purposes Only
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)
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
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)
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.
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)

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? NO For Informational Purposes Only

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: Failure to report all instances of a deviation.
Classification: Moderate

Self Report? NO For Informational Purposes Only

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.

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 63.162
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

Description: Failure to monitor valves, connectors, and replacements for leaking components.

25 Date: 12/11/2017 (1430479) 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)
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? 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 7(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 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? NO For Informational Purposes Only

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.

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)
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

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)
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

Self Report? NO

For Informational Purposes Only

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

Description: 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 event.

Classification: Moderate

Self Report? NO

For Informational Purposes Only

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)

Description: STC 16 OP
Failure to comply with the maximum filtering velocity requirements for fabric filters.

26 Date: 01/31/2018 (1486758)

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

27 Date: 02/28/2018 (1490435)

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

28 Date: 04/10/2018 (1478976)

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)
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

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)
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.

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.

29

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)
Permit Conditions; No. 2g, Pg. 7 PERMIT

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

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

Citation: 30 TAC Chapter 305, SubChapter F 305.125(1)
Monitoring Requirements No. 2, Pg. 4 PERMIT

Description: Failed to accurately accomplish in a representative manner all measurements, tests and calculations.

Classification: Minor

Self Report? NO

For Informational Purposes Only

Citation: 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

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.

30

Date: 07/11/2018 (1489984)

Classification: Minor

Self Report? NO

For Informational Purposes Only

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.

Classification: Minor

Self Report? NO

For Informational Purposes Only

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.

31 Date: 07/16/2018 (1489978) Classification: Moderate

Self Report? NO For Informational Purposes Only

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)
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.
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)
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.

Classification: Moderate

Self Report? NO For Informational Purposes Only

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.

Classification: Minor

Self Report? NO For Informational Purposes Only

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.

32 Date: 10/24/2018 (1512369)

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)
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 unspciated 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).

33 Date: 10/31/2018 (1541444)

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

34 Date: 11/30/2018 (1545228)

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

35 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)
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.

Classification: Moderate

Self Report? NO For Informational Purposes Only

Citation: 30 TAC Chapter 106, SubChapter T 106.452(2)(A)
5C THSC Chapter 382 382.085(b)

Description: STC 16 OP
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? 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)
GTCs OP

Description: Failure to report all instances of deviations.

36 Date: 02/04/2019 (1540328)

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)
5C THSC Chapter 382 382.085(b)
PSDTX1416, Special Condition 1 PERMIT

Description: Failure to prevent unauthorized emissions during an emissions event that occurred on September 14, 2018; TCEQ/STEERS Incident No. 292168.

37 Date: 06/19/2019 (1557608)

Classification: Moderate

Self Report? NO For Informational Purposes Only

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.

Classification: Moderate

Self Report? NO For Informational Purposes Only

Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
5C THSC Chapter 382 382.085(b)
SC No. 3 PERMIT

Description: Failure to prevent excess opacity to the atmosphere during an emissions event that occurred on April 11, 2018; TCEQ/STEERS Incident No. 282672.

- 38 Date: 06/26/2019 (1571573) Classification: Moderate
 Self Report? NO For Informational Purposes Only
 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)
 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.
- 39 Date: 07/31/2019 (1599484) 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
- 40 Date: 08/05/2019 (1578969) Classification: Moderate
 Self Report? NO For Informational Purposes Only
 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.
 Classification: Moderate
- Self Report? NO For Informational Purposes Only
 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 265.171
 Description: Failed to ensure a container holding a hazardous waste (e.g., severe rusting, apparent structural defects) is in good condition.
 Classification: Moderate
- Self Report? NO For Informational Purposes Only
 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.
 Classification: Moderate
- Self Report? NO For Informational Purposes Only
 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.
 Classification: Minor
- Self Report? NO For Informational Purposes Only
 Citation: 30 TAC Chapter 335, SubChapter C 335.69(e)
 40 CFR Chapter 262, SubChapter I, PT 262, SubPT C 262.34(c)(2)
 Description: Failed to ensure the container holding excess amount of hazardous waste marked with the beginning date of excess accumulation.
 Classification: Moderate
- Self Report? NO For Informational Purposes Only
 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.
 Classification: Minor
- Self Report? NO For Informational Purposes Only
 Citation: 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."

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).

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Date: 08/23/2019 (1582081)

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)
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)
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

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 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.

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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)

	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) 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. 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 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

Date: 08/30/2019 (1557529)

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, 10, 14 OP
GTC OP
STC 11 OP
STC 15 OP
STC 25 OP

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.

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 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
STC 7(D) OP

Description: Invista failed to comply with NSR 813 STC 7(C).

Classification: Moderate

Self Report? NO For Informational Purposes Only

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
STC 3 OP

Description: 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 eight 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, 10, 14 OP
GTC OP
STC 15 OP
STC 6(D) OP

Description: 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.

Classification: Moderate

Self Report? NO For Informational Purposes Only

Citation: 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: Invista failed to abide by 30 TAC §117.4205.

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)
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).
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, 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
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).
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? NO For Informational Purposes Only
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.
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? 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 D 60.44
5C THSC Chapter 382 382.085(b)
GTC 1, 10, 14 OP
GTC 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? NO

For Informational Purposes Only

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.

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? NO

For Informational Purposes Only

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 13 OP
STC 3 OP

Description: Invista failed to maintain monitoring records

44 Date: 08/31/2019 (1606389)

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

45* Date: 10/31/2019 (1619049)

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

46* Date: 12/31/2019 (1634042)

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

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Date: 01/03/2020 (1605279)

Classification: Moderate

Self Report? NO

For Informational Purposes Only

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.

48*

Date: 04/30/2020 (1660104)

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

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Date: 05/29/2020 (1644596)

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 comply with time requirements for planned continuous emissions monitoring system (CEMS) maintenance.

Classification: Moderate

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 116.110
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.

Classification: Moderate

Self Report? NO

For Informational Purposes Only

Citation: 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.

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 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.

Classification: Moderate

Self Report? NO For Informational Purposes Only

Citation: 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 1A OP
STC 1E OP

Description: Failure to comply with 40 CFR Part 63, Subpart EEE.

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 6 PERMIT
STC 15 OP

Description: Failure to comply with special conditions of NSR 9560.

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 5B PERMIT
STC 15 OP

Description: Failure to comply with special conditions of NSR 9560.

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)
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? 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
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? 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 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? 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 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
 STC 15 OP

Description: 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)
 FOP O-01902, Special Term & Condition 1 OP

Description: Failure to comply with time limit usage of emergency engines.
 Classification: Moderate

Self Report? NO For Informational Purposes Only

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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 O-01902, Special Term & Condition 22 OP
NSR 23271/PSDTX1416/PSDTX1079M2, SC 16E PERMIT

Description: Failure to prevent open-ended lines.
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 116.111
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.
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? NO For Informational Purposes Only

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.
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.

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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

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

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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? 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)
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.

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)
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 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

53* 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
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.
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)

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.
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)
5C THSC Chapter 382 382.085(b)
GT&C OP

Description: Failure to report all instances of deviations.

54 Date: 09/30/2020 (1693256) 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

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

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

Item 56	August 21, 2017**	(1424158) 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**	(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**	(1486758) 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 (1514024)
Item 78*	July 18, 2018**	For Informational Purposes Only (1506476)
Item 79*	August 02, 2018**	For Informational Purposes Only (1489978)
Item 80	August 17, 2018**	For Informational Purposes Only (1520086)
Item 81*	August 20, 2018**	For Informational Purposes Only (1512265)
Item 82*	August 27, 2018**	For Informational Purposes Only (1512818)
Item 83	September 05, 2018**	For Informational Purposes Only (1527251)
Item 84*	September 20, 2018**	For Informational Purposes Only (1513672)
Item 85*	September 28, 2018**	For Informational Purposes Only (1513685)
Item 86*	October 01, 2018**	For Informational Purposes Only (1519563)
Item 87*	October 11, 2018**	For Informational Purposes Only (1533609)
Item 88*	October 17, 2018**	For Informational Purposes Only (1512369)
Item 89	October 24, 2018**	For Informational Purposes Only (1541444)
Item 90	November 14, 2018**	For Informational Purposes Only (1525087)
Item 91*	November 29, 2018**	For Informational Purposes Only (1545228)
Item 92	December 19, 2018**	For Informational Purposes Only (1532406)
Item 93*	January 14, 2019**	For Informational Purposes Only (1559659)
Item 94*	January 17, 2019**	For Informational Purposes Only (1539278)
Item 95*	January 24, 2019**	For Informational Purposes Only (1500318)
Item 96	January 29, 2019**	For Informational Purposes Only (1540328)
Item 97	February 01, 2019**	For Informational Purposes Only (1559657)

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

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**	(1604022) For Informational Purposes Only
Item 124	November 19, 2019**	(1619049) For Informational Purposes Only
Item 125	December 12, 2019**	(1604859) For Informational Purposes Only
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
Item 143	August 20, 2020**	(1658179) For Informational Purposes Only
Item 144*	August 25, 2020**	(1650930) 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	(1712458) 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
		(1712460)

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

Reg Entity City: VICTORIA

Reg Entity No: RN102663671

EPA Case No: 06-2016-3351

Order Issue Date (yyyymmdd): 20160322

Case Result: Final Order No Penalty

Statute: CAA

Sect of Statute: 112[R][7]

Classification: Minor

Program: Risk Management Progra

Citation:

Violation Type:

Cite Sect:

Cite Part:

Enforcement Action: Administrative Compliance Orders

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. O1904, 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. 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 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.
 - b. 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

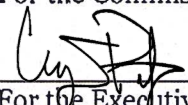
3. All relief not expressly granted in this Order is denied.
4. The duties and provisions imposed by this Order shall apply to and be binding upon the Respondent. The Respondent is ordered to give notice of this Order to personnel who maintain day-to-day control over the Plant operations referenced in 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.

INV Performance Surfaces, LLC
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SIGNATURE PAGE

TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

_____ For the Commission	_____ Date
 _____ For the Executive Director	_____ 12/01/2021 _____ 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.

<u>Jason Leigh</u>	14 June 2021
_____ Signature	_____ Date
Jason Leigh	Technical Manager
_____ Name (Printed or typed)	_____ Title
Authorized Representative 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.