Order Type:

1660 Agreed Order

Findings Order Justification:

N/A **Media:** AIR

Small Business:

No

Location(s) Where Violation(s) Occurred:

Chocolate Bayou Plant, 15926 Farm-to-Market Road 2004, Alvin, Brazoria County

Type of Operation:

Chemical manufacturing plant

Other Significant Matters:

Additional Pending Enforcement Actions: Yes, Docket Nos. 2024-1735-AIR-E;

2023-0916-AIR-E; and 2023-0132-AIR-E; 2022-1565-AIR-E

Past-Due Penalties: No

Other: N/A

Interested Third-Parties: None

Texas Register Publication Date: January 10, 2025

Comments Received: No

Penalty Information

Total Penalty Assessed: \$2,246,729

Amount Deferred for Expedited Settlement: \$449,344

Total Paid to General Revenue: \$898,693

Total Due to General Revenue: \$0

Payment Plan: N/A

Supplemental Environmental Project ("SEP") Conditional Offset: \$898,692

Name of SEP: Texas City Independent School District (Third-Party Pre-Approved)

Compliance History Classifications:

Person/CN - Satisfactory Site/RN - Satisfactory

Major Source: Yes

Statutory Limit Adjustment: N/A

Applicable Penalty Policy: September 2002, April 2014, and January 2021

Investigation Information

Complaint Date(s): N/A **Complaint Information:** N/A

Date(s) of Investigation: January 21, 2016 through August 9, 2016, November 15, 2016 through November 17, 2016, January 10, 2018 through February 15, 2019, February 14, 2018 through February 27, 2018, September 18, 2018 through November 9, 2018, March 31, 2020 through August 26, 2020, June 4, 2020 through June 18, 2020, October 16, 2020 through October 30, 2020, October 23, 2020 through November 17,

2020, November 2, 2020, November 5, 2020 through November 19, 2020, November 30, 2020 through December 1, 2020, December 21, 2020 through April 16, 2021, March 31, 2021 through August 17, 2021, April 5, 2021 through June 23, 2021, April 27, 2021 through May 4, 2021, April 30, 2021 through May 14, 2021, May 13, 2021, June 30, 2021 through July 12, 2021, June 30, 2021 through July 14, 2021, July 20, 2021, July 21, 2021, August 12, 2021 through September 29, 2021, and August 23, 2021 through September 7, 2021

Date(s) of NOE(s): September 1, 2016, April 28, 2017, June 24, 2019, July 13, 2020, May 14, 2021, August 26, 2020, August 28, 2020, December 15, 2020, August 4, 2021, December 18, 2020, May 13, 2021, May 27, 2021, August 31, 2021, June 24, 2021, May 26, 2021, November 15, 2021, June 30, 2021, October 4, 2021, September 1, 2021, September 8, 2021, October 20, 2021, October 12, 2021, August 13, 2021, October 21, 2021, and November 19, 2021

Violation Information

- 1. Failed to comply with the maximum allowable emissions rates ("MAERs"). Specifically, the Respondent exceeded the benzene MAER of 1.01 pounds per hour ("lbs/hr") by a range from 0.01 lb/hr to 0.41 lb/hr and exceeded the volatile organic compounds ("VOC") MAER of 5.96 lbs/hr by a range from 0.09 lb/hr to 2.51 lbs/hr for a total of seven hours on four days from January 8, 2015 to May 4, 2015 for the Olefins 1 American Petroleum Institute ("API") Separator, Emissions Point Number ("EPN") FAM1704, resulting in the unauthorized release of 1.34 pounds ("lbs") of benzene emissions and 8.45 lbs of VOC emissions [30 Tex. Admin. Code §§ 101.20(3), 116.115(b)(2)(F) and (c), and 122.143(4), New Source Review ("NSR") Permit Nos. 95 and PSDTX854M2, Special Conditions ("SC") No. 1, Federal Operating Permit ("FOP") No. 02327, General Terms and Conditions ("GTC") and Special Terms and Conditions ("STC") No. 20, and Tex. Health & Safety Code § 382.085(b)].
- 2. Failed to submit an application for a revision to an FOP for those activities at a site which change, add, or remove one or more permit terms or conditions. Specifically, after FOP No. O2327 was revised on June 4, 2013, the Respondent did not submit an application to revise FOP No. O2327 to include 40 CODE OF FEDERAL REGULATIONS ("CFR") Part 60 Subpart VV as the applicable requirements for the No. 1 Olefins Unit Fugitives and No. 2 Olefins Unit Fugitives [30 Tex. ADMIN. CODE § 122.210(a) and Tex. HEALTH & SAFETY CODE § 382.085(b)].
- 3. Failed to report all instances of deviations. Specifically, the deviation reports for the October 1, 2014 through March 31, 2015 and April 1, 2015 through September 30, 2015 reporting periods did not include the deviation for failing to submit an application to revise FOP No. O2327 to include 40 CFR Part 60 Subpart VV as the applicable requirements for the No. 1 Olefins Unit Fugitives and No. 2 Olefins Unit Fugitives [30 Tex. Admin. Code §§ 122.143(4) and 122.145(2)(A), FOP No. O2327, GTC, and Tex. Health & Safety Code § 382.085(b)].

- 4. Failed to comply with the MAER. Specifically, the Respondent exceeded the carbon monoxide ("CO") MAER of 18.32 lbs/hr by 12.92 lbs/hr for one hour on January 17, 2015 for the Steam Cracking Furnace, EPN DB-106, resulting in 12.92 lbs of unauthorized CO emissions [30 Tex. ADMIN. CODE §§ 101.20(3), 116.115(b)(2)(F) and (c), and 122.143(4), NSR Permit Nos. 95 and PSDTX854M2, SC No. 1, FOP No. O2327, GTC and STC No. 20, and Tex. Health & Safety Code § 382.085(b)].
- 5. Failed to comply with the MAER. Specifically, the Respondent exceeded the CO MAER of 18.32 lbs/hr by a range from 1.16 lbs/hr to 98.10 lbs/hr for a total of four hours on three days from October 2, 2014 to January 14, 2015 for the Steam Cracking Furnace, EPN DB-107, resulting in 163.18 lbs of unauthorized CO emissions [30 Tex. ADMIN. CODE §§ 101.20(3), 116.115(b)(2)(F) and (c), and 122.143(4), NSR Permit Nos. 95 and PSDTX854M2, SC No. 1, FOP No. O2327, GTC and STC No. 20, and Tex. HEALTH & SAFETY CODE § 382.085(b)].
- 6. Failed to comply with the MAERs. Specifically, the Respondent exceeded the VOC MAER of 2.05 lbs/hr by 0.01 lb/hr for a total of two hours on October 19, 2014 and December 18, 2014 and exceeded the CO MAER of 18.32 lbs/hr by 26.73 lbs/hr for one hour on April 9, 2015 for the Steam Cracking Furnace, EPN DB-105, resulting in the unauthorized release of 0.02 lb of VOC emissions and 26.73 lbs of CO emissions [30 Tex. ADMIN. CODE §§ 101.20(3), 116.115(b)(2)(F) and (c), and 122.143(4), NSR Permit Nos. 95 and PSDTX854M2, SC No. 1, FOP No. O2327, GTC and STC No. 20, and Tex. HEALTH & SAFETY CODE § 382.085(b)].
- 7. Failed to comply with the MAER. Specifically, the Respondent exceeded the CO MAER of 7.03 lbs/hr by a range from 0.16 lb/hr to 1.87 lbs/hr for a total of four hours on four days from November 21, 2014 to February 9, 2015 for the Steam Cracking Furnace, EPN DDB-102A, resulting in 3.75 lbs of unauthorized CO emissions [30 Tex. ADMIN. CODE §§ 101.20(3), 116.115(b)(2)(F) and (c), and 122.143(4), NSR Permit Nos. 95 and PSDTX854M2, SC No. 1, FOP No. O2327, GTC and STC No. 20, and Tex. HEALTH & SAFETY CODE § 382.085(b)].
- 8. Failed to comply with the MAERs. Specifically, the Respondent exceeded the nitrogen oxides ("NOx") MAER of 26.60 lbs/hr by a range from 0.01 lb/hr to 1.87 lbs/hr for a total of 52 hours on 11 days from December 2, 2014 to January 8, 2015 and exceeded the CO MAER of 7.03 lbs/hr by a range from 0.41 lb/hr to 7.66 lbs/hr for a total of three hours on three days from February 8, 2015 to March 18, 2015 for the Steam Cracking Furnace, EPN DDB-102B, resulting in the unauthorized release of 29.66 lbs of NOx emissions and 10.72 lbs of CO emissions [30 Tex. ADMIN. CODE §§ 101.20(3), 116.115(b)(2)(F) and (c), and 122.143(4), NSR Permit Nos. 95 and PSDTX854M2, SC No. 1, FOP No. O2327, GTC and STC No. 20, and Tex. HEALTH & SAFETY CODE § 382.085(b)].
- 9. Failed to comply with the MAER. Specifically, the Respondent exceeded the CO MAER of 7.03 lbs/hr by 23.24 lbs/hr for one hour on October 21, 2014 for the Steam Cracking Furnace, EPN DDB-102C, resulting in 23.24 lbs of unauthorized CO emissions [30 Tex. ADMIN. CODE §§ 101.20(3), 116.115(b)(2)(F) and (c), and 122.143(4), NSR Permit

Nos. 95 and PSDTX854M2, SC No. 1, FOP No. O2327, GTC and STC No. 20, and TEX. HEALTH & SAFETY CODE § 382.085(b)].

- 10. Failed to comply with the MAER. Specifically, the Respondent exceeded the CO MAER of 14.40 lbs/hr by a range from 6.94 lbs/hr to 64.51 lbs/hr for a total of 169 hours on nine days from May 26, 2015 to June 2, 2015 and on August 20, 2015 for the No. 2 Olefins Unit Steam Boiler, EPN DDB901B, resulting in 9,806.82 lbs of unauthorized CO emissions [30 Tex. ADMIN. CODE §§ 116.115(b)(2)(F) and (c) and 122.143(4), NSR Permit No. 101, SC No. 1, FOP No. O2327, GTC and STC No. 20, and Tex. Health & Safety Code § 382.085(b)].
- 11. Failed to comply with the emissions limit. Specifically, the Respondent exceeded the CO emissions limit of 0.037 pound per one million British thermal units ("lb/MMBtu") based on the higher heating value of the fuel on a 24-hour average by a range from 0.011 lb/MMBtu to 0.299 lb/MMBtu for a total of 172 hours on nine days from May 11, 2015 to June 2, 2015 for the No. 2 Olefins Unit Steam Boiler, EPN DDB901B [30 Tex. ADMIN. CODE §§ 116.115(c) and 122.143(4), NSR Permit No. 101, SC No. 3.B.(2), FOP No. O2327, GTC and STC No. 20, and Tex. HEALTH & SAFETY CODE § 382.085(b)].
- 12. Failed to submit an application for a revision to an FOP for those activities at a site which change, add, or remove one or more permit terms or conditions. Specifically, after FOP No. O2327 was revised on June 4, 2013, the Respondent did not submit an application to revise FOP No. O2327 to include 30 Tex. Admin. Code § 115.788(a) and 30 Tex. Admin. Code ch. 117 Subchapter B as the applicable requirements for Steam Cracking Furnaces DB-105 through DB-109 and incorporate 30 Tex. Admin. Code § 106.412 for the Gasoline Tank [30 Tex. Admin. Code § 122.210(a) and Tex. Health & Safety Code § 382.085(b)].
- 13. Failed to record the operating time for stationary internal combustion engines with a non-resettable elapsed run-time meter. Specifically, the Respondent did not equip Stationary Engines DDM-904N, DM-177, PP3 MN1601, PP4 TN1601, DM-904N, AN-101, AN-111, and AN-402 with non-resettable elapsed run time meters to record the operating time [30 Tex. Admin. Code §§ 117.340(j) and 122.143(4), FOP No. O2327, GTC and STC No. 1.A., and Tex. Health & Safety Code § 382.085(b)].
- 14. Failed to obtain a revision for an FOP prior to operating emission units at the site. Specifically, after FOP No. O2327 was revised on July 29, 2005, the Respondent did not submit an application to revise FOP No. O2327 to add Emergency Generator DM-177 that was constructed on or about April 1, 2006 and to add Engines OLE2COMP2, UTILCOMP4, UTILCOMP5, and UTILCOMP6 that were replaced in April 2013, resulting in the operation of these emission units prior to obtaining authorization [30 Tex. Admin. Code §§ 122.121 and 122.210(a) and Tex. Health & Safety Code §§ 382.054 and 382.085(b)].

- 15. Failed to submit the 40 CFR Part 63 Subpart ZZZZ compliance reports no later than July 31 or January 31, whichever date is the first date following the end of the semiannual reporting period. Specifically, the Respondent did not submit the 40 CFR Part 63 Subpart ZZZZ compliance reports for the January 1, 2013 through June 30, 2013, July 1, 2013 through December 31, 2013, January 1, 2014 through June 30, 2014, July 1, 2014 through December 31, 2014, January 1, 2015 through June 30, 2015, July 1, 2015 through December 31, 2015, January 1, 2016 through June 30, 2016 reporting periods for Firewater Pump AG-203B and Level Control Pump AG-2705D by July 31, 2013, January 31, 2014, July 31, 2014, January 31, 2015, July 31, 2015, January 31, 2016, and July 31, 2016, respectively [30 Tex. ADMIN. CODE §§ 101.20(2), 113.1090, and 122.143(4), 40 CFR § 63.6650(b)(3), FOP No. O2327, GTC and STC No. 1.A., and Tex. HEALTH & SAFETY CODE § 382.085(b)].
- 16. Failed to maintain records for the calibration of the lower explosive limit ("LEL") detector. Specifically, the Respondent did not maintain the records for the calibration of the LEL detectors for Unit Nos. D5, D10, M2, M4, M5, M8, M9, T5, and Z14 on 13 occasions during maintenance, startup, or shutdown ("MSS") activities that occurred from October 1, 2015 to September 30, 2016 and did not record the calibration of the LEL detector for the No. 1 Olefins Unit MSS activities that occurred on nine occasions from May 29, 2016 to June 21, 2016 [30 Tex. ADMIN. CODE §§ 101.20(3), 116.115(c), and 122.143(4), NSR Permit Nos. 95 and PSDTX854M2, SC No. 61.C.(1), FOP No. O2327, GTC and STC No. 20, and Tex. Health & Safety Code § 382.085(b)].
- 17. Failed to maintain records for the functionality test of the LEL detector. Specifically, the Respondent did not maintain the records for the functionality test of the LEL detectors Unit Nos. A9, D10, D12, D20, H12, H18, H20, J3, J6, M1, M2, M3, M7, M8, M9, and T5 on 33 occasions during MSS activities that occurred from October 1, 2015 to September 30, 2016 and did not record the functionality test data of the LEL detector for the No. 1 Olefins Unit MSS activities that occurred on nine occasions from May 29, 2016 through June 21, 2016 [30 Tex. ADMIN. CODE §§ 101.20(3), 116.115(c), and 122.143(4), NSR Permit Nos. 95 and PSDTX854M2, SC No. 61.C.(2), FOP No. O2327, GTC and STC No. 20, and Tex. Health & Safety Code § 382.085(b)].
- 18. Failed to maintain records containing the information and data sufficient to demonstrate compliance with the permit. Specifically, the Respondent did not maintain the records for the LEL readings during the MSS activities that occurred on November 5, 2015 and April 4, 2016 to demonstrate compliance with SC No. 61.C. of NSR Permit Nos. 95 and PSDTX854M2 [30 Tex. Admin. Code §§ 101.20(3), 116.115(b)(2)(E)(i), and 122.143(4), NSR Permit Nos. 95 and PSDTX854M2, General Conditions No. 7, FOP No. O2327, GTC and STC No. 20, and Tex. Health & Safety Code § 382.085(b)].
- 19. Failed to comply with the concentration limit. Specifically, the Respondent exceeded the benzene outlet concentration limit of 50 parts per million by weight ("ppmw") by a range from 2.8 ppmw to 410.0 ppmw for a total of 16 hours on three days from February 4, 2016 to March 31, 2016 for the Second Stage Hydrotreater Unit

Treatment Process PRO-SSMON and by a range from 17.1 ppmw to 87.0 ppmw for a total of two hours on April 1, 2016 for the Olefins 2 Aromatic Waste Minimization Project Treatment Process PRO-AWMP2 [30 Tex. Admin. Code §§ 101.20(2), 113.120, 113.890, and 122.143(4), 40 CFR §§ 63.138(b)(1)(i) and 63.2450(a), FOP No. O2327, GTC and STC No. 1.A., and Tex. Health & Safety Code § 382.085(b)].

- 20. Failed to comply with the MAER. Specifically, the Respondent exceeded the CO MAER of 9.25 lbs/hr by a range from 0.01 lb/hr to 0.33 lb/hr for a total of 39 hours from November 9, 2015 through November 20, 2015 for the Steam Cracking Furnace, EPN DDB-101B, resulting in 4.27 lbs of unauthorized CO emissions [30 Tex. ADMIN. CODE §§ 101.20(3), 116.115(b)(2)(F) and (c), and 122.143(4), NSR Permit Nos. 95 and PSDTX854M2, SC No. 1, FOP No. O2327, GTC and STC No. 20, and Tex. HEALTH & SAFETY CODE § 382.085(b)].
- 21. Failed to comply with the MAERs. Specifically, the Respondent exceeded the NOx MAER of 14.85 lbs/hr by a range from 0.23 lb/hr to 7.97 lbs/hr for a total of four hours on three days from February 24, 2016 to September 20, 2016 and exceeded the CO MAER of 21.78 lbs/hr by a range from 7.89 lbs/hr to 67.52 lbs/hr for a total of three hours on July 26, 2016 and July 28, 2016 for Furnace No. 105, EPN DDB-105, resulting in the unauthorized release of 9.34 lbs of NOx emissions and 88.02 lbs of CO emissions [30 Tex. Admin. Code §§ 116.115(b)(2)(F) and (c) and 122.143(4), NSR Permit No. 97769, SC No. 1, FOP No. O2327, GTC and STC No. 20, and Tex. Health & Safety Code § 382.085(b)].
- 22. Failed to comply with the concentration limit. Specifically, the Respondent exceeded the ammonia ("NH3") concentration limit of 10 parts per million by volume dry ("ppmvd") at 3.0 percent oxygen ("% O2") based on a 24-hour averaging period by a range from 0.02 ppmvd to 7.94 ppmvd for a total of 503 hours on 38 days from November 7, 2015 to September 9, 2016 for the Steam Cracking Furnace, EPN DB-109 [30 Tex. Admin. Code §§ 117.310(c)(2)(B) and 122.143(4), FOP No. O2327, GTC and STC No. 1.A., and Tex. Health & Safety Code § 382.085(b)].
- 23. Failed to provide records upon request and maintain records containing sufficient information to demonstrate compliance with all applicable Permits by Rules ("PBRs"). Specifically, the Respondent was requested to provide the records containing sufficient information to demonstrate compliance for each PBR and standard exemption listed in the NSR Authorization Table of FOP No. O2327 by February 23, 2017, but 40% of the requested records were not provided [30 Tex. ADMIN. CODE §§ 106.8(c)(2) and (4) and 122.143(4), FOP No. O2327, GTC and STC No. 22, and Tex. HEALTH & SAFETY CODE § 382.085(b)].
- 24. Failed to report all instances of deviations. Specifically, the deviation reports for the October 1, 2015 through March 31, 2016 and April 1, 2016 through September 30, 2016 reporting periods did not include the deviations for failing to obtain a revision for FOP No. O2327 prior to operating emission units at the site; failing to submit an application for a revision to FOP No. O2327 for those activities at a site which change,

add, or remove one or more permit terms or conditions; and failing to submit the 40 CFR Part 63 Subpart ZZZZ compliance reports [30 Tex. Admin. Code §§ 122.143(4) and 122.145(2)(A), FOP No. O2327, GTC, and Tex. Health & Safety Code § 382.085(b)].

- 25. Failed to maintain records to support planned MSS activities. Specifically, the Respondent did not record the number of vacuum truck transfers and the volume of material transferred during five liquid transfers that occurred from April 1, 2017 to September 30, 2017 [30 Tex. ADMIN. CODE §§ 101.20(3), 116.115(c), and 122.143(4), NSR Permit Nos. 95 and PSDTX854M2, SC Nos. 65.A. and 65.C., FOP No. O2327, GTC and STC No. 20, and Tex. Health & Safety Code § 382.085(b)].
- 26. Failed to comply with the MAERs. Specifically, the Respondent exceeded the NOx MAER of 45.01 lbs/hr by a range from 0.23 lb/hr to 4.59 lbs/hr for a total of 12 hours and exceeded the CO MAER of 231.90 lbs/hr by a range from 5.24 lbs/hr to 20.82 lbs/hr for a total of 11 hours on November 21, 2016 and November 22, 2016 for the No. 1 Olefins Flare, EPN DM-1101, resulting in the unauthorized release of 34.04 lbs of NOx emissions and 144.22 lbs of CO emissions [30 Tex. ADMIN. CODE §§ 101.20(3), 116.115(b)(2)(F) and (c), and 122.143(4), NSR Permit Nos. 95 and PSDTX854M2, SC No. 2, FOP No. O2327, GTC and STC No. 20, and Tex. HEALTH & SAFETY CODE § 382.085(b)].
- 27. Failed to comply with the MAERs. Specifically, the Respondent exceeded the NOx MAER of 14.85 lbs/hr by a range from 0.01 lb/hr to 38.20 lbs/hr for a total of 11 hours on three days from December 29, 2016 to February 5, 2017, exceeded the CO MAER of 21.78 lbs/hr by 17.93 lbs/hr and 55.51 lbs/hr for a total of two hours on April 3, 2017, exceeded the NH3 MAER of 4.77 lbs/hr by 0.64 lb/hr on January 21, 2017 and 2.25 lbs/hr on April 3, 2017, and exceeded the NOx annual MAER of 21.68 tons per year ("tpy") based on a 12-month rolling period for the 12-month periods ending from October 2016 through June 2017 for Furnace No. 105, EPN DDB-105, resulting in the unauthorized release of 0.90 ton of NOx emissions, 73.44 lbs of CO emissions, and 2.89 lbs of NH3 emissions [30 Tex. Admin. Code §§ 116.115(b)(2)(F) and (c) and 122.143(4), NSR Permit No. 97769, SC No. 1, FOP No. O2327, GTC and STC No. 20, and Tex. Health & Safety Code § 382.085(b)].
- 28. Failed to comply with the MAERs. Specifically, the Respondent exceeded the CO MAER of 18.32 lbs/hr by a range from 0.59 lb/hr to 12.86 lbs/hr for a total of four hours on four days from October 18, 2016 to August 9, 2017 and exceeded the NH3 MAER of 4.36 lbs/hr by 5.47 lbs/hr for one hour on August 25, 2017 for the Steam Cracking Furnace, EPN DB-105, resulting in the unauthorized release of 22.88 lbs of CO emissions and 5.47 lbs of NH3 emissions [30 Tex. ADMIN. CODE §§ 101.20(3), 116.115(b)(2)(F) and (c), and 122.143(4), NSR Permit Nos. 95 and PSDTX854M2, SC No. 2, FOP No. O2327, GTC and STC No. 20, and Tex. HEALTH & SAFETY CODE § 382.085(b)].
- 29. Failed to comply with the MAER. Specifically, the Respondent exceeded the CO MAER of 7.03 lbs/hr by a range from 0.14 lb/hr to 55.97 lbs/hr for a total of 22 hours on eight days from October 21, 2016 to July 27, 2017 for the Steam Cracking Furnace, EPN DDB-102B, resulting in 172.79 lbs of unauthorized CO emissions [30 Tex. ADMIN.

CODE §§ 101.20(3), 116.115(b)(2)(F) and (c), and 122.143(4), NSR Permit Nos. 95 and PSDTX854M2, SC No. 2, FOP No. O2327, GTC and STC No. 20, and TEX. HEALTH & SAFETY CODE § 382.085(b)].

- 30. Failed to comply with the MAERs. Specifically, the Respondent exceeded the CO MAER of 18.32 lbs/hr by a range from 1.33 lbs/hr to 55.55 lbs/hr for a total of eight hours on eight days from November 24, 2016 to September 20, 2017 and exceeded the NH3 MAER of 4.36 lbs/hr by 3.54 lbs/hr and 7.17 lbs/hr for a total of two hours on August 25, 2017 for the Steam Cracking Furnace, EPN DB-106, resulting in unauthorized release of 163.88 lbs of CO emissions and 10.71 lbs of NH3 emissions [30 Tex. ADMIN. CODE §§ 101.20(3), 116.115(b)(2)(F) and (c), and 122.143(4), NSR Permit Nos. 95 and PSDTX854M2, SC No. 2, FOP No. O2327, GTC and STC No. 20, and Tex. HEALTH & SAFETY CODE § 382.085(b)].
- 31. Failed to comply with the MAER. Specifically, the Respondent exceeded the CO MAER of 7.03 lbs/hr by a range from 0.21 lb/hr to 12.55 lbs/hr for a total of seven hours on four days from November 28, 2016 to September 26, 2017 for the Steam Cracking Furnace, EPN DDB-102D, resulting in 40.26 lbs of unauthorized CO emissions [30 Tex. ADMIN. CODE §§ 101.20(3), 116.115(b)(2)(F) and (c), and 122.143(4), NSR Permit Nos. 95 and PSDTX854M2, SC No. 2, FOP No. O2327, GTC and STC No. 20, and Tex. HEALTH & SAFETY CODE § 382.085(b)].
- 32. Failed to comply with the MAER. Specifically, the Respondent exceeded the CO MAER of 18.32 lbs/hr by a range from 0.14 lb/hr to 20.28 lbs/hr for a total of 10 hours on nine days from November 30, 2016 to August 17, 2017 for the Steam Cracking Furnace, EPN DB-108, resulting in 60.78 lbs of unauthorized CO emissions [30 Tex. ADMIN. CODE §§ 101.20(3), 116.115(b)(2)(F) and (c), and 122.143(4), NSR Permit Nos. 95 and PSDTX854M2, SC No. 2, FOP No. O2327, GTC and STC No. 20, and Tex. HEALTH & SAFETY CODE § 382.085(b)].
- 33. Failed to comply with the MAER. Specifically, the Respondent exceeded the CO MAER of 14.40 lbs/hr by a range from 0.08 lb/hr to 27.36 lbs/hr for a total of 106 hours on 13 days from November 6, 2016 to January 27, 2017 for the No. 2 Olefins Unit Steam Boiler, EPN DDB901B, resulting in 460.29 lbs of unauthorized CO emissions [30 Tex. ADMIN. CODE §§ 116.115(b)(2)(F) and (c) and 122.143(4), NSR Permit No. 101, SC No. 1, FOP No. O2327, GTC and STC No. 20, and Tex. HEALTH & SAFETY CODE § 382.085(b)].
- 34. Failed to comply with the MAER. Specifically, the Respondent exceeded the CO MAER of 7.03 lbs/hr by a range from 0.73 lb/hr to 7.70 lbs/hr for a total of six hours on three days from February 23, 2017 to August 23, 2017 for the Steam Cracking Furnace, EPN DDB-102A, resulting in 26.96 lbs of unauthorized CO emissions [30 Tex. ADMIN. CODE §§ 101.20(3), 116.115(b)(2)(F) and (c), and 122.143(4), NSR Permit Nos. 95 and PSDTX854M2, SC No. 2, FOP No. O2327, GTC and STC No. 20, and Tex. HEALTH & SAFETY CODE § 382.085(b)].

- 35. Failed to comply with the MAER. Specifically, the Respondent exceeded the CO MAER of 7.03 lbs/hr by a range from 2.02 lbs/hr to 32.69 lbs/hr for a total of six hours on four days from March 19, 2017 to August 18, 2017 for the Steam Cracking Furnace, EPN DDB-102C, resulting in 81.21 lbs of unauthorized CO emissions [30 Tex. ADMIN. CODE §§ 101.20(3), 116.115(b)(2)(F) and (c), and 122.143(4), NSR Permit Nos. 95 and PSDTX854M2, SC No. 2, FOP No. O2327, GTC and STC No. 20, and Tex. HEALTH & SAFETY CODE § 382.085(b)].
- 36. Failed to report all instances of deviations. Specifically, the deviation report for the April 1, 2016 through September 30, 2016 reporting period did not include the deviation for conducting a cylinder gas audit ("CGA") earlier than two months after the previous CGA [30 Tex. Admin. Code §§ 122.143(4) and 122.145(2)(A), FOP No. O2327, GTC, and Tex. Health & Safety Code § 382.085(b)].
- 37. Failed to submit an initial notification for a reportable emissions event no later than 24 hours after the discovery of an emissions event. Specifically, although Incident No. 270980 began on September 4, 2017 at 9:55 a.m., Incident No. 270980 was not discovered until October 24, 2017 at 9:55 a.m. so the initial notification for Incident No. 270980 was due by October 25, 2017 at 9:55 a.m., but was not submitted until October 25, 2017 at 2:47 p.m. [30 Tex. ADMIN. CODE §§ 101.201(a)(1)(B) and 122.143(4), FOP No. 02327, GTC and STC No. 2.F., and Tex. HEALTH & SAFETY CODE § 382.085(b)].
- 38. Failed to prevent unauthorized emissions. Specifically, the Respondent released 8,617.16 lbs of VOC as fugitive emissions, during an emissions event (Incident No. 270980) that began on September 4, 2017 and lasted 1,201 hours [30 Tex. ADMIN. CODE §§ 101.20(3), 116.115(c), and 122.143(4), NSR Permit Nos. 95 and PSDTX854M2, SC No. 2, FOP No. O2327, GTC and STC No. 20, and Tex. Health & Safety Code § 382.085(b)].
- 39. Failed to prevent unauthorized emissions. Specifically, the Respondent released 32,724.77 lbs of CO, 6,422.18 lbs of NOx, and 36,234.14 lbs of VOC as fugitive emissions, during an emissions event (Incident No. 275491) that occurred on January 2, 2018 and lasted 18 hours and 15 minutes [30 Tex. ADMIN. CODE §§ 101.20(3), 116.115(c), and 122.143(4), NSR Permit Nos. 95 and PSDTX854M2, SC No. 2, FOP No. O2327, GTC and STC No. 20, and Tex. Health & Safety Code § 382.085(b)].
- 40. Failed to maintain the net heating value of the gas being combusted at 300 British thermal units per standard cubic foot ("Btu/scf") or greater if the flare is steamassisted or air-assisted. Specifically, the net heating value of the gas being combusted by the No. 1 Olefins Flare was less than 300 Btu/scf when the net heating value ranged from 0.00 Btu/scf to 299.47 Btu/scf for 668 hours on 178 days from August 1, 2018 to September 24, 2019 [30 Tex. ADMIN. CODE §§ 101.20(1), (2), and (3), 113.100, 116.115(c), and 122.143(4), 40 CFR §§ 60.18(c)(3)(ii) and 63.11(b)(6)(ii), NSR Permit Nos. 95 and PSDTX854M2 (effective December 21, 2015, SC No. 12.A., NSR Permit Nos. 95 and

PSDTX854M2 (effective August 8, 2018), SC No. 7.A., FOP No. O2327, GTC and STC Nos. 1.A. and 20, and Tex. Health & Safety Code § 382.085(b)].

- 41. Failed to operate a flare with no visible emissions except periods not to exceed a total of five minutes during any two consecutive hours. Specifically, the Respondent documented that visible emissions were observed for a total of 63 hours and 34 minutes on 12 days from June 2, 2018 to September 19, 2019 for the No. 2 Olefins Flare [30 Tex. Admin. Code §§ 101.20(1), (2), and (3), 116.115(c), and 122.143(4), 40 CFR §§ 60.18(c)(1) and 63.11(b)(4), NSR Permit Nos. 95 and PSDTX854M2 (effective December 21, 2015), SC No. 12.C., NSR Permit Nos. 95 and PSDTX854M2 (effective August 8, 2018), SC No. 7.C., FOP No. O2327, GTC and STC Nos. 1.A., 3.A.(i), and 26, and Tex. Health & Safety Code § 382.085(b)].
- 42. Failed to operate a flare with no visible emissions except periods not to exceed a total of five minutes during any two consecutive hours. Specifically, the Respondent documented that visible emissions were observed for a total of six hours and 18 minutes on four days from September 29, 2018 to September 19, 2019 for the No. 1 Olefins Flare [30 Tex. Admin. Code §§ 101.20(1), (2) and (3), 116.115(c), and 122.143(4), 40 CFR §§ 60.18(c)(1) and 63.11(b)(4), NSR Permit Nos. 95 and PSDTX854M2 (effective December 21, 2015), SC No. 12.C., NSR Permit Nos. 95 and PSDTX854M2 (effective August 8, 2018), SC No. 7.C., FOP No. 02327, GTC and STC Nos. 1.A., 3.A.(i), and 26, and Tex. Health & Safety Code § 382.085(b)].
- 43. Failed to continuously monitor and record a process parameter for the treatment process or wastewater treatment system unit. Specifically, the benzene analyzers did not continuously monitor the Aromatic Waste Minimization Project stripper bottoms in the Benzene Treatment Process 2 Unit for a total of 95 hours and 37 minutes on seven days from October 11, 2017 to November 30, 2017 [30 Tex. Admin. Code §§ 101.20(2) and 122.143(4), 40 CFR § 61.354(a)(2), FOP No. O2327, GTC and STC No. 1.A., and Tex. Health & Safety Code § 382.085(b)].
- 44. Failed to comply with the emissions limit. Specifically, the Respondent exceeded the NOx emissions limit of 0.2 lb/MMBtu by a range from 0.01 lb/MMBtu to 0.07 lb/MMBtu for a total of 220 hours on 13 days from October 5, 2018 to March 25, 2019 for the No. 1 Olefins Unit Steam Boiler, EPN DB-901A [30 Tex. ADMIN. CODE §§ 116.115(c) and 122.143(4), NSR Permit No. 101, SC No. 3.A.(1), FOP No. 02327, GTC and STC No. 26, and Tex. Health & Safety Code § 382.085(b)].
- 45. Failed to create a final record for a non-reportable emissions event no later than two weeks after the end of an emissions event. Specifically, the final record for the non-reportable emissions event that occurred from December 10, 2017 to March 8, 2018 was not created by March 22, 2018, the final record for the non-reportable emissions event that occurred from April 16, 2018 to April 20, 2018 was not created by May 4, 2018, and the final record for the non-reportable emissions event that occurred from November 14, 2018 to November 28, 2018 was not created by December

- 12, 2018 [30 Tex. ADMIN. CODE §§ 101.201(b) and 122.143(4), FOP No. O2327, GTC and STC No. 2.F., and Tex. Health & Safety Code § 382.085(b)].
- 46. Failed to report all instances of deviations. Specifically, the deviation report for the October 1, 2017 through March 31, 2018 reporting period did not include the deviation for failing to create the final record for a non-reportable emissions event no later than two weeks after the end of the emissions event [30 Tex. ADMIN. CODE §§ 122.143(4) and 122.145(2)(A), FOP No. O2327, GTC, and Tex. HEALTH & SAFETY CODE § 382.085(b)].
- 47. Failed to report all instances of deviations. Specifically, the deviation report for the April 1, 2018 through September 30, 2018 reporting period did not include the deviation for failing to create the final record for a non-reportable emissions event no later than two weeks after the end of an emissions event [30 Tex. ADMIN. CODE §§ 122.143(4) and 122.145(2)(A), FOP No. O2327, GTC, and Tex. HEALTH & SAFETY CODE § 382.085(b)].
- 48. Failed to report all instances of deviations. Specifically, the deviation report for the October 1, 2018 through March 31, 2019 reporting period did not include the deviation for failing to create the final record for a non-reportable emissions event no later than two weeks after the end of the emissions event [30 Tex. ADMIN. CODE §§ 122.143(4) and 122.145(2)(A), FOP No. O2327, GTC, and Tex. Health & Safety Code § 382.085(b)].
- 49. Failed to prevent unauthorized emissions. Specifically, the Respondent released 7,575.10 lbs of CO, 1,486.37 lbs of NOx, and 6,622.43 lbs of VOC from the No. 1 Olefins Flare, EPN DM-1101, during an emissions event (Incident No. 334381) that occurred on April 22, 2020 and lasted seven hours [30 Tex. Admin. Code §§ 101.20(3), 116.115(c), and 122.143(4), NSR Permit Nos. 95 and PSDTX854M2, SC No. 2, FOP No. O2327, GTC and STC No. 26, and Tex. Health & Safety Code § 382.085(b)].
- 50. Failed to prevent unauthorized emissions. Specifically, the Respondent released 2,070.60 lbs of CO, 406.19 lbs of NOx, and 2,916.80 lbs of VOC from the No. 2 Olefins Flare, EPN DDM-3101, and released 880.50 lbs of VOC as fugitive emissions, during an emissions event (Incident No. 341971) that occurred on September 9, 2020 and lasted five hours and 20 minutes [30 Tex. ADMIN. CODE §§ 101.20(3), 116.115(c), and 122.143(4), NSR Permit Nos. 95 and PSDTX854M2, SC No. 2, FOP No. O2327, GTC and STC No. 26, and Tex. Health & Safety Code § 382.085(b)].
- 51. Failed to submit a copy of the testing and sampling reports within 60 days after the completion of the testing and sampling. Specifically, the copy of the performance test for Turbine 1 was required to be submitted by April 14, 2020, but was not submitted until April 28, 2020; the copy of the performance test for Turbine 2 was required to be submitted by April 16, 2020, but was not submitted until April 28, 2020; the copy of the performance test for Boiler 2 was required to be submitted by April 20, 2020, but was not submitted until April 28, 2020; and the copy of the performance test for the Dew Point Heater was required to be submitted by April 27, 2020, but was not submitted until April 28, 2020 [30 Tex. ADMIN. CODE §§ 101.20(3), 116.115(c),

- 117.345(c), and 122.143(4), NSR Permit Nos. 123117, PSDTX1460, and GHGPSDTX135, SC No. 20.H., FOP No. O3966, GTC and STC Nos. 1.A. and 7, and Tex. Health & Safety Code § 382.085(b)].
- 52. Failed to comply with the MAER. Specifically, during a stack test completed on February 14, 2020, the Respondent exceeded the sulfur dioxide ("SO2") MAER of 0.07 lb/hr by 0.052 lb/hr for Turbine 1, EPN Turbine 1, resulting in approximately 686.40 lbs of unauthorized SO2 emissions [30 Tex. ADMIN. CODE §§ 101.20(3), 116.115(b)(2)(F) and (c), and 122.143(4), NSR Permit Nos. 123117, PSDTX1460, and GHGPSDTX135, SC No. 1, FOP No. O3966, GTC and STC No. 7, and Tex. HEALTH & SAFETY CODE § 382.085(b)].
- 53. Failed to comply with the MAER. Specifically, during a stack test completed on February 16, 2020, the Respondent exceeded the SO2 MAER of 0.07 lb/hr by 0.038 lb/hr for Turbine 2, EPN Turbine 2, resulting in approximately 499.78 lbs of unauthorized SO2 emissions [30 Tex. ADMIN. CODE §§ 101.20(3), 116.115(b)(2)(F) and (c), and 122.143(4), NSR Permit Nos. 123117, PSDTX1460, and GHGPSDTX135, SC No. 1, FOP No. O3966, GTC and STC No. 7, and Tex. HEALTH & SAFETY CODE § 382.085(b)].
- 54. Failed to comply with the MAER. Specifically, during a stack test completed on February 20, 2020, the Respondent exceeded the SO2 MAER of 0.05 lb/hr by 0.003 lb/hr for Boiler 2, EPN BLR2, resulting in approximately 39.17 lbs of unauthorized SO2 emissions [30 Tex. ADMIN. CODE §§ 101.20(3), 116.115(b)(2)(F) and (c), and 122.143(4), NSR Permit Nos. 123117, PSDTX1460, and GHGPSDTX135, SC No. 1, FOP No. O3966, GTC and STC No. 7, and Tex. HEALTH & SAFETY CODE § 382.085(b)].
- 55. Failed to comply with the MAER. Specifically, during a stack test completed on February 29, 2020, the Respondent exceeded the particulate matter ("PM") MAER of 1.95 lbs/hr by 0.46 lb/hr for Boiler 1, EPN BLR1, resulting in approximately 839.04 lbs of unauthorized PM emissions [30 Tex. ADMIN. CODE §§ 101.20(3), 116.115(b)(2)(F) and (c), and 122.143(4), NSR Permit Nos. 123117, PSDTX1460, and GHGPSDTX135, SC No. 1, FOP No. O3966, GTC and STC No. 7, and Tex. Health & Safety Code § 382.085(b)l.
- 56. Failed to comply with the MAER. Specifically, during a stack test completed on February 20, 2020, the Respondent exceeded the PM MAER of 1.95 lbs/hr by 8.26 lbs/hr for Boiler 2, EPN BLR2, resulting in approximately 17,643.36 lbs of unauthorized PM emissions [30 Tex. ADMIN. CODE §§ 101.20(3), 116.115(b)(2)(F) and (c), and 122.143(4), NSR Permit Nos. 123117, PSDTX1460, and GHGPSDTX135, SC No. 1, FOP No. O3966, GTC and STC No. 7, and Tex. HEALTH & SAFETY CODE § 382.085(b)].
- 57. Failed to comply with the concentration limit. Specifically, during a stack test completed on February 29, 2020, the Respondent exceeded the NH3 concentration limit of 10 ppmvd corrected to 3.0% O2 by 2.25 ppmvd for Boiler 3, EPN BLR3 [30 Tex. Admin. Code §§ 101.20(3), 116.115(c), 117.310(c)(2), and 122.143(4), NSR Permit Nos. 123117, PSDTX1460, and GHGPSDTX135, SC No. 7, FOP No. O3966, GTC and STC Nos. 1.A. and 7, and Tex. Health & Safety Code § 382.085(b)].

- 58. Failed to maintain and operate a totalizing fuel flow meter to individually and continuously measure the gas and liquid fuel usage. Specifically, during the stack test conducted from February 26, 2020 to February 27, 2020, the fuel flow meter for the Dew Point Heater was not operational [30 Tex. ADMIN. CODE §§ 117.340(a) and 122.143(4), FOP No. O3966, GTC and STC No. 1.A., and Tex. Health & Safety Code § 382.085(b)].
- 59. Failed to comply with the MAER. Specifically, during a stack test completed on February 20, 2020, the Respondent exceeded the SO2 MAER of 0.05 lb/hr by 0.0027 lb/hr for Boiler 3, EPN BLR3, resulting in approximately 34.67 lbs of unauthorized SO2 emissions [30 Tex. ADMIN. CODE §§ 101.20(3), 116.115(b)(2)(F) and (c), and 122.143(4), NSR Permit Nos. 123117, PSDTX1460, and GHGPSDTX135, SC No. 1, FOP No. O3966, GTC and STC No. 7, and Tex. Health & Safety Code § 382.085(b)].
- 60. Failed to prevent unauthorized emissions. Specifically, the Respondent released 110.37 lbs of VOC as fugitive emissions, during an emissions event (Incident No. 342492) that occurred on September 18, 2020 and lasted eight hours [30 Tex. ADMIN. CODE §§ 101.20(3), 116.115(c), and 122.143(4), NSR Permit Nos. 95 and PSDTX854M2, SC No. 2, FOP No. 02327, GTC and STC No. 26, and Tex. Health & Safety Code § 382.085(b)].
- 61. Failed to identify all required information on the final record for a reportable emissions event. Specifically, the Respondent did not identify all of the compounds released from the EPNs involved during the shutdown of the Butadiene Unit on the final record for Incident No. 342492 [30 Tex. ADMIN. CODE §§ 101.201(b)(1)(G) and 122.143(4), FOP No. O2327, GTC and STC No. 2.F., and Tex. HEALTH & SAFETY CODE § 382.085(b)].
- 62. Failed to prevent unauthorized emissions. Specifically, the Respondent released 77,184.97 lbs of CO, 15,145.54 lbs of NOx, and 78,003.59 lbs of VOC from the No. 2 Olefins Flare, EPN DDM-3101, during an emissions event (Incident No. 344750) that began on October 24, 2020 and lasted 59 hours [30 Tex. Admin. Code §§ 101.20(3), 116.115(c), and 122.143(4), NSR Permit Nos. 95 and PSDTX854M2, SC No. 2, FOP No. O2327, GTC and STC No. 26, and Tex. Health & Safety Code § 382.085(b)].
- 63. Failed to comply with the MAERs. Specifically, the Respondent exceeded the ethylene MAER of 78.75 tpy based on a 12-month rolling period, exceeded the CO MAER of 156.36 tpy based on a 12-month rolling period, and exceeded the NOx MAER of 30.68 tpy based on a 12-month rolling period for the 12-month period ending on September 2020 for the Olefins 2 Flare Routine Startup, Shutdown and Maintenance Emissions, EPN DDM-3101MSS, resulting in 11.21 tons of unauthorized ethylene emissions, 27.42 tons of unauthorized CO emissions, and 5.38 tons of unauthorized NOx emissions [30 Tex. ADMIN. CODE §§ 101.20(3), 116.115(b)(2)(F) and (c), and 122.143(4), NSR Permit Nos. 95 and PSDTX854M2, SC No. 2, FOP No. O2327, GTC and STC No. 26, and Tex. Health & Safety Code § 382.085(b)].

- 64. Failed to maintain the net heating value of the gas being combusted at 300 Btu/scf or greater if the flare is steam-assisted or air-assisted. Specifically, the net heating value of the gas being combusted by the No. 1 Olefins Facilities Flare was less than 300 Btu/scf when the net heating value ranged from 0.00 Btu/scf to 299.77 Btu/scf for a total of 3,357 hours on 301 days from October 1, 2019 to September 30, 2020 [30 Tex. ADMIN. CODE §§ 101.20(1), (2), and (3), 113.100, 116.115(c), and 122.143(4), 40 CFR §§ 60.18(c)(3)(ii) and 63.11(b)(6)(ii), NSR Permit Nos. 95 and PSDTX854M2, SC No. 7.A., FOP No. 02327, GTC and STC Nos. 1.A and 26, and Tex. HEALTH & SAFETY CODE § 382.085(b)].
- 65. Failed to comply with the operating parameter limit. Specifically, the Respondent did not maintain the established operating parameter limit of at least 2.6% O2 level when the oxygen level ranged from 0.00% to 2.598% for a total of 677 hours on 49 days from October 1, 2019 to January 12, 2020 for the No. 1 Olefins Boiler [30 Tex. ADMIN. CODE §§ 115.725(a)(2)(D) and 122.143(4), FOP No. O2327, GTC and STC No. 1.A., and Tex. Health & Safety Code § 382.085(b)].
- 66. Failed to comply with the concentration limit. Specifically, the Respondent exceeded the NH3 concentration limit of 10 ppmvd corrected to 3.0% O2 based on a rolling 24-hour averaging period by a range from 0.75 ppmvd to 144.99 ppmvd for a total of 14 hours on October 16, 2019 and April 11, 2020 for Furnace No. 105 [30 Tex. ADMIN. CODE §§ 116.115(c), 117.310(c)(2)(B), and 122.143(4), NSR Permit No. 97769, SC No. 5.F., FOP No. O2327, GTC and STC Nos. 1.A. and 26, and Tex. HEALTH & SAFETY CODE § 382.085(b)].
- 67. Failed to comply with the concentration limit. Specifically, the Respondent exceeded the NH3 slip concentration limit of 20 ppmvd corrected to 3% O2 on an hourly basis by a range from 3.18 ppmvd to 1,206.66 ppmvd for a total of 15 hours on five days from October 15, 2019 to August 22, 2020 for Furnace No. 105 [30 Tex. ADMIN. CODE §§ 116.115(c) and 122.143(4), NSR Permit No. 97769, SC No. 5.F., FOP No. O2327, GTC and STC No. 26, and Tex. Health & Safety Code § 382.085(b)].
- 68. Failed to comply with the firing rate limit. Specifically, the Respondent exceeded the firing rate limit of 388 million British thermal units per hour ("MMBtu/hr") by a range from 0.06 MMBtu/hr to 28.35 MMBtu/hr for a total of 227 hours on 13 days from October 1, 2019 to April 19, 2020 for the No. 2 Olefins Unit Steam Boiler [30 Tex. Admin. Code §§ 116.115(c) and 122.143(4), NSR Permit No. 101, SC No. 3.B.(3), FOP No. O2327, GTC and STC No. 26, and Tex. Health & Safety Code § 382.085(b)].
- 69. Failed to comply with the concentration limit. Specifically, the Respondent exceeded the NH3 concentration limit of 10 ppmvd corrected at 3.0% O2 by a range from 5.23 ppmvd to 262.37 ppmvd for a total of seven hours on August 27, 2020 and August 29, 2020 for the Steam Cracking Furnace [30 Tex. ADMIN. CODE §§ 117.310(c)(2) and 122.143(4), FOP No. O2327, GTC and STC No. 1.A., and Tex. Health & Safety Code § 382.085(b)].

- 70. Failed to comply with the MAER. Specifically, the Respondent exceeded the VOC MAER of 87.50 tpy based on a 12-month rolling period for the 12-month periods ending from August 2020 through September 2020 for the Olefins 1 and 2 Flare, EPN FLAREMSSCAP, resulting in 50.94 tons of unauthorized VOC emissions [30 Tex. ADMIN. CODE §§ 101.20(3), 116.115(b)(2)(F) and (c), and 122.143(4), NSR Permit Nos. 95 and PSDTX854M2, SC No. 2, FOP No. O2327, GTC and STC No. 26, and Tex. HEALTH & SAFETY CODE § 382.085(b)].
- 71. Failed to submit an application for a revision to an FOP at a site to change, add, or remove one or more permit terms and conditions. Specifically, the Respondent did not submit an application to revise FOP No. O2327 to incorporate the applicable regulatory requirements for Stationary Reciprocating Internal Combustion Engines UTILCMP3, UTILCMP4, UTILCMP6, OLE2COMP2, and DCPCOMP2 [30 Tex. ADMIN. CODE § 122.210(a) and Tex. Health & Safety Code § 382.085(b)].
- 72. Failed to comply with the concentration limits. Specifically, the Respondent exceeded the CO concentration limit of 4.0 ppmvd corrected to 15% O2 by a range from 0.001 ppmvd to 72.25 ppmvd for a total of 1,178 hours on 99 days from January 15, 2020 to September 30, 2020, exceeded the NOx concentration limit of 2.0 ppmvd at 15% O2 by a range from 0.0003 ppmvd to 556.78 ppmvd for a total of 412 hours on 40 days from January 15, 2020 to July 8, 2020, exceeded the NH3 concentration limit of 7.0 ppmvd at 15% O2 by a range from 0.001 ppmvd to 3.18 ppmvd for a total of 23 hours on seven days from January 29, 2020 to August 18, 2020, and exceeded the NH3 concentration limit of 10.0 ppmvd at 15% O2 by 0.18 ppmvd for one hour on January 9, 2020 for Turbine 1 [30 Tex. ADMIN. Code §§ 101.20(3), 116.115(c), 117.310(c)(2)(A), and 122.143(4), NSR Permit Nos. 123117, PSDTX1460, and GHGPSDTX135, SC No. 5, FOP No. O3966, GTC and STC Nos. 1.A. and 7, and Tex. HEALTH & SAFETY CODE § 382.085(b)].
- 73. Failed to comply with the concentration limits. Specifically, the Respondent exceeded the CO concentration limit of 4.0 ppmvd at 15% O2 by a range from 0.001 ppmvd to 37.44 ppmvd for a total of 2,760 hours on 153 days from January 15, 2020 to September 30, 2020, exceeded the NOx concentration limit of 2.0 ppmvd at 15% O2 by a range from 0.0001 ppmvd to 83.68 ppmvd for a total of 144 hours on 26 days from January 14, 2020 to August 27, 2020, exceeded the NH3 concentration limit of 7.0 ppmvd at 15% O2 by a range from 0.56 ppmvd to 14.23 ppmvd for a total of 25 hours on seven days from March 21, 2020 to June 27, 2020, and exceeded the NH3 concentration limit of 10.0 ppmvd at 15% O2 by a range from 2.66 ppmvd to 11.23 ppmvd for a total of 19 hours on five days from March 27, 2020 to June 27, 2020 for Turbine 2 [30 Tex. ADMIN. Code §§ 101.20(3), 116.115(c), 117.310(c)(2)(A), and 122.143(4), NSR Permit Nos. 123117, PSDTX1460, and GHGPSDTX135, SC No. 5, FOP No. O3966, GTC and STC Nos. 1.A. and 7, and Tex. HEALTH & SAFETY CODE § 382.085(b)].
- 74. Failed to comply with the MAERs. Specifically, the Respondent exceeded the CO MAER of 6.60 lbs/hr by a range from 0.03 lb/hr to 36.75 lbs/hr for a total of 220 hours on 35 days from February 1, 2020 to September 30, 2020 and exceeded the NOx MAER

of 5.42 lbs/hr by a range from 0.09 lb/hr to 29.42 lbs/hr for a total of 85 hours on 23 days from from January 29, 2020 to September 3, 2020 for Turbine 1, EPN Turbine 1, resulting in the unauthorized release of 850.73 lbs of CO emissions and 600.11 lbs of NOx emissions [30 Tex. ADMIN. CODE §§ 101.20(3), 116.115(b)(2)(F) and (c), and 122.143(4), NSR Permit Nos. 123117, PSDTX1460, and GHGPSDTX135, SC No. 1, FOP No. O3966, GTC and STC No. 7, and Tex. Health & Safety Code § 382.085(b)].

75. Failed to comply with the MAERs. Specifically, the Respondent exceeded the CO MAER of 6.60 lbs/hr by a range from 2.60 lbs/hr to 205.17 lbs/hr for a total of 1,558 hours on 93 days from January 30, 2020 to September 30, 2020, exceeded the NOx MAER of 5.42 lbs/hr by a range from 0.06 lb/hr to 111.53 lbs/hr for a total of 58 hours on 11 days from January 30, 2020 to July 7, 2020, exceeded the NH3 MAER of 7.01 lbs/hr by a range from 0.76 lb/hr to 14.09 lbs/hr for a total of three hours on three days from April 18, 2020 to May 25, 2020, and exceeded the VOC MAER of 0.68 lb/hr by a range from 0.0001 lb/hr to 0.05 lb/hr for a total of 50 hours from February 15, 2020 to March 29, 2020 for Turbine 2, EPN Turbine 2, resulting in the unauthorized release of 9,819.14 lbs of CO emissions, 1,695.43 lbs of NOx emissions, 16.47 lbs of NH3 emissions, and 1.50 lbs of VOC emissions [30 Tex. ADMIN. CODE §§ 101.20(3), 116.115(b)(2)(F) and (c), and 122.143(4), NSR Permit Nos. 123117, PSDTX1460, and GHGPSDTX135, SC No. 1, FOP No. O3966, GTC and STC No. 7, and Tex. HEALTH & SAFETY CODE § 382.085(b)].

76. Failed to comply with the emissions and concentration limits. Specifically, the Respondent exceeded the CO concentration limit of 50 ppmvd at 3% O2 by a range from 1.99 ppmvd to 139.43 ppmvd for a total of 15 hours on four days from February 24, 2020 to March 29, 2020, exceeded the NOx emissions limit of 0.01 lb/MMBtu by a range from 0.005 lb/MMBtu to 0.08 lb/MMBtu for a total of 171 hours on 19 days from February 20, 2020 to September 11, 2020, and exceeded the NH3 concentration limit of 10.0 ppmvd at 3% O2 based on a rolling 24-hour averaging period by a range from 0.05 ppmvd to 64.57 ppmvd for a total of 558 hours on 29 days from February 23, 2020 to September 16, 2020 for Boiler 1 [30 Tex. ADMIN. Code §§ 101.20(3), 116.115(c), 117.310(c)(2)(B), and 122.143(4), NSR Permit Nos. 123117, PSDTX1460, and GHGPSDTX135, SC No. 7, FOP No. O3966, GTC and STC Nos. 1.A. and 7, and Tex. HEALTH & SAFETY CODE § 382.085(b)].

77. Failed to comply with the emissions and concentration limits. Specifically, the Respondent exceeded the NOx emissions limit of 0.01 lb/MMBtu by a range from 0.01 lb/MMBtu to 0.09 lb/MMBtu for a total of 391 hours on 34 days from February 4, 2020 to September 22, 2020 and exceeded the NH3 concentration limit of 10.0 ppmvd at 3% O2 based on a rolling 24-hour averaging period by a range from 0.05 ppmvd to 0.42 ppmvd for a total on 21 hours on July 3, 2020 and July 4, 2020 for Boiler 2 [30 Tex. ADMIN. CODE §§ 101.20(3), 116.115(c), 117.310(c)(2)(B), and 122.143(4), NSR Permit Nos. 123117, PSDTX1460, and GHGPSDTX135, SC No. 4, FOP No. O3966, GTC and STC Nos. 1.A. and 7, and Tex. Health & Safety Code § 382.085(b)].

78. Failed to comply with the emissions and concentration limits. Specifically, the Respondent exceeded the CO concentration limit of 50 ppmvd at 3% O2 by a range from 0.23 ppmvd to 299.04 ppmvd for a total of 115 hours on 13 days from January 6, 2020 to April 19, 2020, exceeded the NOx emissions limit of 0.01 lb/MMBtu by a range from 0.005 lb/MMBtu to 0.19 lb/MMBtu for a total of 616 hours on 36 days from January 6, 2020 to September 16, 2020, and exceeded the NH3 concentration limit of 10.0 ppmvd at 3% O2 based on a rolling 24-hour averaging period by a range from 0.05 ppmvd to 28.67 ppmvd for a total of 741 hours on 48 days from January 20, 2020 to September 30, 2020 for Boiler 3 [30 Tex. Admin. Code §§ 101.20(3), 116.115(c), 117.310(c)(2)(B), and 122.143(4), NSR Permit Nos. 123117, PSDTX1460, and GHGPSDTX135, SC No. 7, FOP No. O3966, GTC and STC Nos. 1.A. and 7, and Tex. HEALTH & SAFETY CODE § 382.085(b)].

79. Failed to comply with MAERs. Specifically, the Respondent exceeded the CO MAER of 15.22 lbs/hr by a range from 1.49 lb/hr to 15.39 lbs/hr for a total of five hours on February 24, 2020 and March 3, 2020, exceeded the NOx MAER of 4.17 lbs/hr by a range from 0.01 lb/hr to 10.00 lbs/hr for a total of 87 hours on 16 days from February 25, 2020 to September 11, 2020, exceeded the NH3 MAER of 1.85 lbs/hr by a range from 0.01 lb/hr to 29.00 lbs/hr for a total of 206 hours on 16 days from February 23, 2020 to April 19, 2020, and exceeded the SO2 MAER of 0.05 lb/hr by a range from 0.00001 lb/hr to 0.01 lb/hr for a total of six hours on February 23, 2020 and February 24, 2020 for Boiler 1, EPN BLR1, resulting in the unauthorized release of 34.01 lbs of CO emissions, 407.69 lbs of NOx emissions, 533.00 lbs of NH3, and 0.06 lb of SO2 emissions [30 Tex. ADMIN. CODE §§ 101.20(3), 116.115(b)(2)(F) and (c), and 122.143(4), NSR Permit Nos. 123117, PSDTX1460, and GHGPSDTX135, SC No. 1, FOP No. O3966, GTC and STC No. 7, and Tex. HEALTH & SAFETY CODE § 382.085(b)].

80. Failed to comply with the MAERs. Specifically, the Respondent exceeded the CO MAER of 15.22 lbs/hr by a range from 0.11 lb/hr to 2.88 lbs/hr for a total of 12 hours on April 16, 2020 and April 19, 2020, exceeded the NOx MAER of 4.17 lbs/hr by a range from 0.01 lb/hr to 11.11 lbs/hr for a total of 226 hours on 32 days from January 6, 2020 to September 16, 2020, and exceeded the PM MAER of 1.95 lbs/hr by a range from 0.01 lb/hr to 0.47 lb/hr for a total of 19 hours from January 22, 2020 to March 24, 2020 for Boiler 3, EPN BLR3, resulting in the unauthorized release of 11.15 lbs of CO emissions, 340.17 lbs of NOx emissions, and 4.37 lbs of PM emissions [30 Tex. ADMIN. CODE §§ 101.20(3), 116.115(b)(2)(F) and (c), and 122.143(4), NSR Permit Nos. 123117, PSDTX1460, and GHGPSDTX135, SC No. 1, FOP No. O3966, GTC and STC No. 7, and Tex. Health & Safety Code § 382.085(b)].

81. Failed to prevent unauthorized emissions. Specifically, the Respondent released 6,805.61 lbs of CO and 1,348.23 lbs of NOx from the No. 1 Olefins Flare, EPN DM-1101, during an emissions event (Incident No. 352585) that began on March 12, 2021 and lasted 27 hours [30 Tex. Admin. Code §§ 101.20(3), 116.115(c), and 122.143(4), NSR Permit Nos. 95 and PSDTX854M2, SC No. 2, FOP No. O2327, GTC and STC No. 26, and Tex. Health & Safety Code § 382.085(b)].

- 82. Failed to prevent unauthorized emissions. Specifically, the Respondent released 1,996.98 lbs of CO, 391.84 lbs of NOx, and 2,823.11 lbs of VOC from the No. 2 Olefins Flare, EPN DDM-3101, during an emissions event (Incident No. 285534) that occurred on June 2, 2018 and lasted two hours [30 Tex. ADMIN. CODE §§ 101.20(3), 116.115(c), and 122.143(4), NSR Permit Nos. 95 and PSDTX854M2, SC No. 2, FOP No. O2327, GTC and STC No. 26, and Tex. Health & Safety Code § 382.085(b)].
- 83. Failed to prevent unauthorized emissions. Specifically, the Respondent released 66,227.61 lbs of CO, 13,065.88 lbs of NOx, and 39,464.64 lbs of VOC from the No. 2 Olefins Flare, EPN DDM-3101, during an emissions event (Incident No. 354056) that began on April 12, 2021 and lasted 155 hours [30 Tex. ADMIN. CODE §§ 101.20(3), 116.115(c), and 122.143(4), NSR Permit Nos. 95 and PSDTX854M2, SC No. 2, FOP No. O2327, GTC and STC No. 26, and Tex. HEALTH & SAFETY CODE § 382.085(b)].
- 84. Failed to prevent unauthorized emissions. Specifically, the Respondent released 479.27 lbs of CO, 94.02 lbs of NOx, and 547.15 lbs of VOC from the No. 1 Olefins Flare, EPN DM-1101, during an emissions event (Incident No. 291225) that occurred on August 28, 2018 and lasted one hour [30 Tex. ADMIN. CODE §§ 101.20(3), 116.115(c), and 122.143(4), NSR Permit Nos. 95 and PSDTX854M2, SC No. 2, FOP No. O2327, GTC and STC No. 26, and Tex. Health & Safety Code § 382.085(b)].
- 85. Failed to prevent unauthorized emissions. Specifically, the Respondent released 563.86 lbs of VOC as fugitive emissions, during an emissions event (Incident No. 293328) that began on September 29, 2018 and lasted 13 hours [30 Tex. ADMIN. CODE §§ 101.20(3), 116.115(c), and 122.143(4), NSR Permit Nos. 95 and PSDTX854M2, SC No. 2, FOP No. O2327, GTC and STC No. 26, and Tex. Health & Safety Code § 382.085(b)].
- 86. Failed to prevent unauthorized emissions. Specifically, the Respondent released 353.30 lbs of VOC as fugitive emissions, during an emissions event (Incident No. 297512) that occurred on November 19, 2018 and lasted nine hours [30 Tex. ADMIN. CODE §§ 101.20(3), 116.115(c), and 122.143(4), NSR Permit Nos. 95 and PSDTX854M2, SC No. 2, FOP No. O2327, GTC and STC No. 26, and Tex. Health & Safety Code § 382.085(b)].
- 87. Failed to prevent unauthorized emissions. Specifically, the Respondent released 198.90 lbs of ethylene as fugitive emissions, during an emissions event (Incident No. 340661) that began on August 13, 2020 and lasted two hours and 33 minutes [30 Tex. Admin. Code §§ 101.20(3), 116.115(c), and 122.143(4), NSR Permit Nos. 95 and PSDTX854M2, SC No. 2, FOP No. O2327, GTC and STC No. 26, and Tex. Health & Safety Code § 382.085(b)].
- 88. Failed to prevent unauthorized emissions. Specifically, the Respondent released 12,425.00 lbs of VOC as fugitive emissions, during an emissions event (Incident No. 340681) that occurred on August 15, 2020 and lasted 30 minutes [30 Tex. ADMIN. CODE §§ 101.20(3), 116.115(c), and 122.143(4), NSR Permit Nos. 95 and PSDTX854M2, SC No. 2, FOP No. O2327, GTC and STC No. 26, and Tex. Health & Safety Code § 382.085(b)].

- 89. Failed to prevent unauthorized emissions. Specifically, the Respondent released 8,413.27 lbs of CO, 1,657.64 of NOx, and 4,115.85 lbs of VOC from the No. 1 Olefins Flare, EPN DM-1101, during an emissions event (Incident No. 332637) that began on March 23, 2020 and lasted 14 hours [30 Tex. ADMIN. CODE §§ 101.20(3), 116.115(c), and 122.143(4), NSR Permit Nos. 95 and PSDTX854M2, SC No. 2, FOP No. O2327, GTC and STC No. 26, and Tex. Health & Safety Code § 382.085(b)].
- 90. Failed to prevent unauthorized emissions. Specifically, the Respondent released 11,713.24 lbs of CO, 2,302.91 lbs of NOx, and 12,270.70 lbs of VOC from the No. 1 Olefins Flare, EPN DM-1101, during an emissions event (Incident No. 333191) that occurred on April 1, 2020 and lasted nine hours [30 Tex. ADMIN. CODE §§ 101.20(3), 116.115(c), and 122.143(4), NSR Permit Nos. 95 and PSDTX854M2, SC No. 2, FOP No. O2327, GTC and STC No. 26, and Tex. Health & Safety Code § 382.085(b)].
- 91. Failed to prevent unauthorized emissions. Specifically, the Respondent released 825.00 lbs of ethylene as fugitive emissions, during an emissions event (Incident No. 324083) that occurred on November 4, 2019 and lasted 12 minutes [30 Tex. ADMIN. CODE §§ 101.20(3), 116.115(c), and 122.143(4), NSR Permit Nos. 95 and PSDTX854M2, SC No. 2, FOP No. O2327, GTC and STC No. 26, and Tex. Health & Safety Code § 382.085(b)].
- 92. Failed to prevent unauthorized emissions. Specifically, the Respondent released 602.11 lbs of CO, 118.10 lbs of NOx, and 945.82 lbs of VOC from the No. 1 Olefins Flare, EPN DM-1101, during an emissions event (Incident No. 339521) that occurred on July 24, 2020 and lasted 50 minutes [30 Tex. ADMIN. CODE §§ 101.20(3), 116.115(c), and 122.143(4), NSR Permit Nos. 95 and PSDTX854M2, SC No. 2, FOP No. O2327, GTC and STC No. 26, and Tex. Health & Safety Code § 382.085(b)].
- 93. Failed to prevent unauthorized emissions. Specifically, the Respondent released 4,009.92 lbs of CO, 786.81 lbs of NOx, and 3,749.71 lbs of VOC from the No. 2 Olefins Flare, EPN DDM-3101, during an emissions event (Incident No. 296381) that began on November 4, 2018 and lasted four hours [30 Tex. ADMIN. CODE §§ 101.20(3), 116.115(c), and 122.143(4), NSR Permit Nos. 95 and PSDTX854M2, SC No. 2, FOP No. O2327, GTC and STC No. 26, and Tex. Health & Safety Code § 382.085(b)].
- 94. Failed to prevent unauthorized emissions. Specifically, the Respondent released 2,753.07 lbs of CO, 540.13 lbs of NOx, and 3,304.23 lbs of VOC from the No. 2 Olefins Flare, EPN DDM-3101, and released 1,055.68 lbs of CO, 207.08 lbs of NOx, and 1,152.79 lbs of VOC from the No. 1 Olefins Flare, EPN DM-1101, during an emissions event (Incident No. 291947) that occurred on September 11, 2018 and lasted six hours [30 Tex. ADMIN. CODE §§ 101.20(3), 116.115(c), and 122.143(4), NSR Permit Nos. 95 and PSDTX854M2, SC No. 2, FOP No. O2327, GTC and STC No. 26, and Tex. HEALTH & SAFETY CODE § 382.085(b)].
- 95. Failed to prevent unauthorized emissions. Specifically, the Respondent released 250.05 lbs of CO, 641.20 lbs of NOx, 23.22 lbs of VOC, 22.09 lbs of NH3, 89.30 lbs of

PM, and 0.89 lb of SO2 from Turbine 1, EPN Turbine 1, during an emissions event (Incident No. 333379) that began on April 4, 2020 and lasted 32 hours [30 Tex. ADMIN. CODE §§ 101.20(3), 116.115(c), and 122.143(4), NSR Permit Nos. 123117, PSDTX1460, and GHGPSDTX135, SC No. 1, FOP No. O3966, GTC and STC No. 7, and Tex. HEALTH & SAFETY CODE § 382.085(b)].

96. Failed to prevent unauthorized emissions. Specifically, the Respondent released 31.00 lbs of VOC as fugitive emissions and released 8,433.31 lbs of CO, 1,667.25 lbs of NOx, and 5,804.05 lbs of VOC from the No. 2 Olefins Flare, EPN DDM-3101, during an emissions event (Incident No. 364479) that began on August 9, 2021 and lasted 26 hours and 10 minutes [30 Tex. ADMIN. CODE §§ 101.20(3), 116.115(c), and 122.143(4), NSR Permit Nos. 95 and PSDTX854M2, SC No. 2, FOP No. O2327, GTC and STC No. 26, 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 October 21, 2014, adjusted the feed, fuel, and oxygen levels in order to comply with the CO hourly MAER for the Steam Cracking Furnace, EPN DDB-102C;
- b. On January 14, 2015, adjusted the feed, fuel, and oxygen levels in order to comply with the CO hourly MAER for the Steam Cracking Furnace, EPN DB-107;
- c. On January 17, 2015, adjusted the feed, fuel, and oxygen levels in order to comply with the CO hourly MAER for the Steam Cracking Furnace, EPN DB-106;
- d. On February 9, 2015, adjusted the feed, fuel, and oxygen levels in order to comply with the CO hourly MAER for the Steam Cracking Furnace, EPN DDB-102A;
- e. On March 18, 2015, adjusted the feed, fuel, and oxygen levels in order to comply with the NOx and CO hourly MAERs for the Steam Cracking Furnace, EPN DDB-102B;
- f. On April 9, 2015, adjusted the feed, fuel, and oxygen levels in order to comply with the VOC and CO hourly MAERs for the Steam Cracking Furnace, EPN DB-105;
- g. On May 4, 2015, adjusted the feed, fuel, and oxygen levels in order to comply with the benzene and VOC hourly MAERs for the Olefins 1 API Separator, EPN FAM1704;
- h. On June 2, 2015, adjusted the feed, fuel, and oxygen levels in order to comply with the CO emissions limit for the No. 2 Olefins Unit Steam Boiler, EPN DDB901B;
- i. On August 20, 2015, adjusted the feed, fuel, and oxygen levels in order to comply with the CO hourly MAER for the No. 2 Olefins Unit Steam Boiler, EPN DDB901B;

- j. On November 20, 2015, implemented measures in order to comply with the CO hourly MAER for the Steam Cracking Furnace, EPN DDB-101B;
- k. On April 1, 2016, adjusted the process conditions in order to comply with the benzene outlet concentration limit for the Second Stage Hydrotreater Unit Treatment Process PRO-SSMON and Olefins 2 Aromatic Waste Minimization Project Treatment Process PRO-AWMP2;
- l. On September 9, 2016, implemented measures in order to comply with the NH3 concentration limit for the Steam Cracking Furnace, EPN DB-109;
- m. On September 20, 2016, implemented measures in order to comply with the NOx and CO hourly MAERs for Furnace No. 105, EPN DDB-105;
- n. By September 30, 2016, upgraded the data acquisition and data storage system for the MSS monitoring program and began maintaining the records for the calibration of the LEL detectors;
- o. By September 30, 2016, began maintaining the records for the functionality test for the LEL detectors;
- p. By September 30, 2016, began maintaining the records containing the information and data sufficient for the LEL readings during MSS activities in order to demonstrate compliance with NSR Permit Nos. 95 and PSDTX854M2;
- q. By November 29, 2016, maximized the hydrogen to fuel gas ratio in order to comply with the NOx and CO hourly MAERs for the No. 1 Olefins Flare, EPN DM-1101;
- r. On January 27, 2017, implemented measures in order to comply with the CO hourly MAER for the No. 2 Olefins Unit Steam Boiler, EPN DDB901B;
- s. By April 15, 2017, began recording the operating time for Stationary Engines DDM-904N, DM-177, PP3 MN1601, PP4 TN1601, DM-904N, AN-101, AN-111, and AN-402;
- t. On April 26, 2017, submitted a revised deviation report for the April 1, 2016 through September 30, 2016 reporting period to report the deviation for failing to conduct a CGA earlier than two months after the previous CGA;
- u. On July 27, 2017, implemented measures in order to comply with the CO hourly MAER for the Steam Cracking Furnace, EPN DDB-102B;
- v. By July 31, 2017, restored the steam in the furnace, restarted the NH3 system heater, resumed NH3 injection, and made adjustments to the furnace to limit the firing rate and NOx emissions in order to comply with the NOx, CO, and NH3 hourly MAERs and NOx annual MAER for Furnace No. 105, EPN DDB-105;

- w. On August 17, 2017, implemented measures in order to comply with the CO hourly MAER for the Steam Cracking Furnace, EPN DB-108;
- x. On August 18, 2017, implemented measures in order to comply with the CO hourly MAER for the Steam Cracking Furnace, EPN DDB-102C;
- y. On August 23, 2017, implemented measures in order to comply with the CO hourly MAER for the Steam Cracking Furnace, EPN DDB-102A;
- z. On August 25, 2017, implemented measures in order to comply with the CO and NH3 hourly MAERs for the Steam Cracking Furnace, EPN DB-105;
- aa. On September 20, 2017, implemented measures in order to comply with the CO and NH3 hourly MAERs for the Steam Cracking Furnace, EPN DB-106;
- bb. On September 26, 2017, implemented measures in order to comply with the CO hourly MAER for the Steam Cracking Furnace, EPN DDB-102D;
- cc. By September 30, 2017, began maintaining the records for the number of vacuum truck transfers and the volume of material transferred during the liquid transfers supporting planned MSS activities;
- dd. On October 25, 2017, submitted the initial notification for Incident No. 270980;
- ee. On October 27, 2017, obtained a revision for FOP No. O2327 that included 40 CFR Part 60 Subpart VV as the applicable requirements for the No. 1 Olefins Unit Fugitives and No. 2 Olefins Unit Fugitives; as applicable requirements for Steam Cracking Furnaces DB-105 through DB-109; for the Gasoline Tank; added Emergency Generator DM-177 that was constructed on or about April 1, 2006; and added Engines OLE2COMP2, UTILCOMP4, UTILCOMP5, and UTILCOMP6 that were replaced in April 2013;
- ff. On November 30, 2017, re-established communication in the distributive control system historian so that the system can collect, communicate, and record process data in order to continuously monitor and record the Aromatic Waste Minimization Project stripper bottoms in the Benzene Treatment Process 2 Unit;
- gg. By January 15, 2018, updated the procedure for the Boiler Startup by adding steps to ensure that the valves are closed after a startup activity has been completed in order to prevent the recurrence of emissions events due to the same or similar causes as Incident No. 270980;
- hh. By February 1, 2019, added logic to the Triconex to prevent the furnace from going to offline decoke if the feed Hand Indicating Control valve is still open, created a gun drill procedure to detail a response to the incident and describe a method to retest the

furnace logic to take the furnace to safe state, and updated the Digital Control System ("DCS") display for clarity in order to prevent the recurrence of emissions events due to the same or similar causes as Incident No. 285534;

- ii. By April 3, 2019, updated the DDB-105 Start-Up Procedure for clarity on lighting the burners while introducing feed to the furnace and developed training for Operations to allow the board operators to practice feeding the Selective Cracking Optimum Recovery ("SCORE") furnace in order to prevent the recurrence of emissions events due to the same or similar causes as Incident No. 296381;
- jj. On September 19, 2019, stabilized the flare to reduce flaring, restored the steam pressure to increase the steam to the flare, restarted the boilers, and repaired the electrical system in order to operate the No. 2 Olefins Flare with no visible emissions;
- kk. On September 19, 2019, stabilized the flare to reduce flaring, restored the steam pressure to increase the steam to the flare, restarted the boilers, and repaired the electrical system in order to operate the No. 1 Olefins Flare with no visible emissions;
- ll. By December 20, 2019, added the diethylhydroxylamine ("DEHA") lab specifications to help ensure adequate residual, added a low velocity operating envelope point to track and prevent low flow, and added DEHA alarms to both units to various towers to help ensure adequate residual in order to prevent the recurrence of emissions events due to the same or similar causes as Incident Nos. 293328 and 297512;
- mm. On January 12, 2020, raised the oxygen level for the No. 1 Olefins Boiler in order to comply with the operating parameter limit of at least 2.6 % O2;
- nn. By February 10, 2020, revised the Maintenance Preventative Maintenance Procedure to include detailed steps on disassembly and reassembly, including verification of complete lifting nut disengagement from the filter head, cleanliness requirements, and maintenance witnessing nitrogen pressure test of re-assembled filter in order to prevent the recurrence of emissions events due to the same or similar causes as Incident No. 324083;
- oo. On February 27, 2020, replaced the battery for the totalizing fuel flow meter in order to continuously measure the gas and liquid fuel usage for the Dew Point Heater;
- pp. On April 11, 2020, implemented measures in order to comply with the NH3 concentration limit for Furnace No. 105;
- qq. On April 19, 2020, implemented measures in order to comply with the firing rate limit for the No. 2 Olefins Unit Steam Boiler;
- rr. By April 21, 2020, implemented time delay undervoltage protection at each applicable variable frequency drive in order to prevent the recurrence of emissions events due to the same or similar causes as Incident No. 332637;

ss. On April 28, 2020, submitted a copy of the performance test reports for Turbine 1, Turbine 2, Boiler 2, and the Dew Point Heater;

tt. On May 15, 2020, conducted a stack test demonstrating compliance with the PM hourly MAER for Boiler 1, EPN BLR1;

uu. On May 19, 2020, conducted a stack test demonstrating compliance with the PM hourly MAER for Boiler 2, EPN BLR2;

vv. On May 20, 2020, conducted a stack test demonstrating compliance with the NH3 concentration limit for Boiler 3, EPN BLR3;

ww. On May 21, 2020, conducted a stack test demonstrating compliance with the VOC hourly MAER for Turbine 2, EPN Turbine 2;

xx. On August 22, 2020, implemented measures in order to comply with the NH3 slip concentration limit for Furnace No. 105;

yy. On August 29, 2020, implemented measures in order to comply with the NH3 concentration limit for the Steam Cracking Furnace;

zz. On September 30, 2020, added natural gas to the No. 1 Olefins Facilities Flare in order to maintain the net heating value of the gas being combusted at 300 Btu/scf or greater;

aaa. By September 30, 2020, implemented a reasonable inquiry process for the deviation report process by reviewing data on a more frequent basis and expanding the review process to include operators, engineers, and others in order to ensure that all instances of deviations are reported in a timely manner;

bbb. By October 1, 2020, removed the local stop switch from the current enclosure and installed a new switch rated for the area electrical classifications in order to prevent the recurrence of emissions events due to the same or similar causes as Incident No. 275491;

ccc. By November 2, 2020, ceased operations of the Dew Point Heater;

ddd. By November 30, 2020, labeled valves in the field to help ensure proper line-ups are made in order to prevent the recurrence of emissions events due to the same or similar causes as Incident No. 339521;

eee. On December 14, 2020, created and maintained the final records for the non-reportable emissions events that occurred from December 10, 2017 to March 8, 2018, from April 16, 2018 to April 20, 2018, and from November 14, 2018 to November 28, 2018;

fff. On February 4, 2021, submitted revised deviation reports for the October 1, 2017 through March 31, 2018, April 1, 2018 through September 30, 2018, and October 1, 2018 through March 31, 2019 reporting periods to report the deviations for failing to create the final records for the non-reportable emissions events no later than two weeks after the end of each emissions event;

ggg. By February 28, 2021, implemented an improved maintenance management plan by having the Operations personnel review the emission points where the emissions originated from every month and demonstrated compliance with the VOC annual MAER for the Olefins 1 and 2 Flare, EPN FLAREMSSCAP;

hhh. By March 31, 2021, developed communication protocols and training for the operators on the proper radio etiquette in order to prevent the recurrence of emissions events due to the same or similar causes as Incident No. 333191;

iii. By April 6, 2021, implemented a low output alarm at 10 percent to alert the operators if the valve fails inadvertently in order to prevent the recurrence of emissions events due to the same or similar causes as Incident No. 341971;

jjj. By April 19, 2021, performed maintenance on the compressor in order to prevent the recurrence of emissions events due to the same or similar causes as Incident No. 354056;

kkk. By May 31, 2021, implemented measures to comply with the ethylene, CO, and NOx annual MAERs for the Olefins 2 Flare Routine, Startup, Shutdown, and Maintenance Emissions, EPN DDM-3101MSS;

lll. By August 31, 2021, added inspection of the rack and servo linkage pins to the Maintenance Preventative Maintenance Procedure in order to prevent recurrence to prevent the recurrence of emissions events due to the same or similar causes as Incident No. 344750;

mmm. By September 27, 2021, replaced the capacitor bank breaker, tested the electrical equipment insulation for deterioration, conducted switching only on an as needed basis, and calculated and verified that the capacitor charging time is less than 10 seconds in order to prevent the recurrence of emissions events due to the same or similar causes as Incident No. 352585;

nnn. By December 20, 2021, installed a sampling system upstream of the selective catalytic reduction ("SCR") catalyst bed and developed a mapping procedure to provide operations with a guideline for preparation of the turbines for mapping in order to prevent the recurrence of emissions events due to the same or similar causes as Incident No. 333379;

ooo. By April 14, 2022, obtained PBR Registration No. 168626 that increased the natural gas flow to the No. 1 Olefins Flare in order to maintain the net heating value of the gas being combusted at 300 Btu/scf or greater;

ppp. By June 23, 2022, evaluated the Abnormal Situation Management ("ASM") Control Language ("CL") programs for all trip scenarios on similar Kinetics Technology International ("KTI") furnaces to confirm the proper actions if activated, updated the DCS control narratives, created a cause and effect matrix for KTI furnace trip scenarios, and created guidance for testing the CL programs to ensure proper function in order to prevent the recurrence of emissions events due to the same or similar causes as Incident No. 291947;

qqq. By June 28, 2022, implemented a new DEHA injection in the feed to the unit, installed new vent tubing for continuous purge and removal of potential oxygen from the system, and added operator rounds to check the insulation bands for expansion in order to prevent the recurrence of emissions events due to the same or similar causes as Incident No. 342492;

rrr. By July 2, 2022, conducted equipment preventative maintenance while equipment is down until the quadvoter upgrade project is complete and revised procedure H0302A08 to include steps related to re-introducing feed to T-305 and T-307 after acetylene run in order to prevent the recurrence of emissions events due to the same or similar causes as Incident No. 364479;

sss. On September 26, 2022, permanently shut down the No. 1 Olefins Unit Steam Boiler, EPN DB-901A;

ttt. By September 27, 2022, installed sample points and began routine sampling for 2301 and 3301 Lube Oil and cleaned the lube oil reservoirs for Turbine 1 and Turbine 2 in order to prevent the recurrence of emissions events due to the same or similar causes as Incident No. 334381;

uuu. By October 21, 2022, developed a document that provides guidelines to evaluate acoustic and flow induced vibration, updated the Project Design Basis Template to capture a review of the bypass scope control valves in critical applications, and updated the Relief System Design Guide to include considerations around piping design and acoustic-induced vibration in order to prevent the recurrence of emissions events due to the same or similar causes as Incident No. 340681;

vvv. By May 26, 2023, verified the contractor's quality control manual addresses non-conformance issues and developed an inspection and testing plan to identify and document any issues that need to be addressed on the package prior to final sign-off in order to prevent the recurrence of emissions events due to the same or similar causes as Incident No. 340661;

www. By July 14, 2023, established a review process to allow two levels of review for any reportable emissions event in order to ensure that all of the required information is identified on the final records for reportable emissions events;

xxx. By November 1, 2023, removed Stationary Reciprocating Internal Combustion Engines UTILCMP3, UTILCMP4, UTILCMP6, OLE2COMP2 from the Plant;

yyy. By July 29, 2024, implemented a 10 degree Fahrenheit maximum set point change limit on the reactor bed outlet temperature control in order to prevent the recurrence of emissions events due to the same or similar causes as Incident No. 291225; and

zzz. On August 23, 2024, obtained PBR No. 177025 to downsize Stationary Reciprocating Internal Combustion Engine DCPCOMP2 and updated FOP No. 0237 through the use of the off-permit change process.

aaaa. On December 18, 2024, submitted a permit amendment application for NSR Permit Nos. 123117, PSDTX1460, and GHGPSDTX135 to address the exceedances for the SO2, CO, and NOx hourly MAER and the NH3, CO, and NOx concentration limits for Turbines 1 and 2, the NH3 hourly MAER for Turbine 2, the CO and NOx concentration limits for Boilers 1 and 3, the NOx concentration limit for Boiler 2, the SO2 hourly MAER for Boilers 1, 2, and 3, the CO and NOx hourly MAER for Boilers 1 and 3, the NH3 hourly MAER for Boiler 1, and the hourly PM MAER for Boiler 3.

Technical Requirements:

- 1. The Order will require the Respondent to implement and complete a SEP (see SEP Attachment A).
- 2. The Order will also require the Respondent to:
- a. Within 30 days:
- i. Submit revised deviation reports for the October 1, 2014 through March 31, 2015 and April 1, 2015 through September 30, 2015 reporting periods to report the deviation for failing to submit an application to revise FOP No. O2327 to include 40 CFR Part 60 Subpart VV as the applicable requirements for the No. 1 Olefins Unit Fugitives and No. 2 Olefins Unit Fugitives;
- ii. Submit the 40 CFR Part 63 Subpart ZZZZ compliance reports for the January 1, 2013 through June 30, 2013, July 1, 2013 through December 31, 2013, January 1, 2014 through June 30, 2014, July 1, 2014 through December 31, 2014, January 1, 2015 through June 30, 2015, July 1, 2015 through December 31, 2015, January 1, 2016 through June 30, 2016 reporting periods for Firewater Pump AG-203B and Level Control Pump AG-2705D;

iii. Begin maintaining the records containing sufficient information to demonstrate compliance for each PBR and standard exemption listed in the NSR Authorization Table of FOP No. O2327 and make the records available in a reviewable format at the request of personnel from the Commission; and

iv. Submit revised deviation reports for the October 1, 2015 through March 31, 2016 and April 1, 2016 through September 30, 2016 reporting periods to report the deviations for failing to obtain a revision for FOP No. O2327 prior to operating emission units at the site; failing to submit an application for a revision to FOP No. O2327 for those activities at a site which change, add, or remove one or more permit terms or conditions; and failing to submit the 40 CFR Part 63 Subpart ZZZZ compliance reports.

- b. Within 45 days, submit written certification demonstrating compliance with 2.a.
- c. Within 180 days after the effective date of this Order, develop a boiler SCR catalyst demonstration project designed to control NOx and NH3 emissions and install a new SCR catalyst on either Boiler 1, 2 or 3.
- d.Within 180 days after installation of the SCR system on the boiler selected in Ordering Provision 2.c, determine the effectiveness of the new SCR catalyst based on the NH3 concentration. If the SCR catalyst demonstration project is achieving NOx and NH3 emissions control, purchase two additional SCR systems for installation on the remaining two boilers. If the SCR catalyst demonstration project does not achieve NOx and NH3 emissions control on the selected boiler, submit written certification of the results within 120 operation days.
- e. Within 180 days after receiving the SCR systems, install the new SCR system on the remaining two boilers.
- f. Within 120 operation days after installation of the new SCR system on the two remaining boilers, submit written certification demonstrating that the control of NOx and NH3 emissions for Boilers 1, 2 or 3 has been achieved.

Contact Information

TCEQ Attorney: N/A

TCEQ Enforcement Coordinator: Yuliya Dunaway, Enforcement Division, Enforcement Team 2, MC R-13, (210) 403-4077; Michael Parrish, Enforcement Division, MC 219, (512) 239-2548

TCEQ SEP Coordinator: Stuart Beckley, Enforcement Division, MC 219, (512) 239-3565 **SEP Third-Party Administrator**: Texas City Independent School District SEP, 2901 Turtle Creek Drive, Suite 445, Port Arthur, Texas 77642

Respondent: Greg Blanchard, Site Director, INEOS USA LLC, P.O. Box 1488, Alvin,

Texas 77512

Respondent's Attorney: N/A



Penalty Calculation Worksheet (PCW) Policy Revision 4 (April 2014)

PCW Revision March 26, 2014

Assigned 6-Sep-2016 DATES

PCW	14-Oct-2024 Screening 23-Sep-2016	EPA Due 27-Feb-2017		
RESPONDENT/FACILI	TY INFORMATION			
Respondent	INEOS USA LLC (PCW No. 1 of 4)			
Reg. Ent. Ref. No.				
Facility/Site Region	12-Houston	Major/Minor Source	Major	
		<u>-</u>		
CASE INFORMATION				
Enf./Case ID No.	60882	No. of Violations	38	
Docket No.	2021-0818-AIR-E	Order Type	1660	
Media Program(s)	Air	Government/Non-Profit	No	
Multi-Media		Enf. Coordinator	Danielle Porras	
		EC's Team	Enforcement Team 2	

Adı	min. Penalty \$	Limit Minimum	\$0 Max	imum	\$25,000			
			Penalty C	Calcula	tion Section	on		
TOTA	L BASE PENA	ALTY (Sum o	f violation base	e penal	ties)		Subtotal 1	\$241,500
ADJU	STMENTS (+							
	Subtotals 2-7 are o Compliance Hi		g the Total Base Penalty	y (Subtotal 1 78.0%) by the indicated p Adjustment		tals 2, 3, & 7	\$188,370
	Notes	Enhancement for with dissim	or three NOVs with ilar violations, and ition for one Notice Disclosure	same or s three orde of Intent	imilar violations ers containing a to conduct an a	, three NOVs denial of		4.00,070
	Culpability	No		0.0%	Enhancement		Subtotal 4	\$0
	Notes	The Re	espondent does not	meet the	culpability crite	eria.		
	Good Faith Eff	ort to Comply	Total Adjustments	S			Subtotal 5	-\$42,952
	Economic Ben				Enhancement*		Subtotal 6	\$0
	Estimated	Total EB Amounts d Cost of Compliance	\$11,767 \$260,250	*Cappe	d at the Total EB \$ A	Amount		
SUM (OF SUBTOTA	LS 1-7				F	inal Subtotal	\$386,918
	R FACTORS A		MAY REQUIRE cated percentage.		0.0%		Adjustment	\$0
	Notes							
						Final Per	nalty Amount	\$386,918
STAT	UTORY LIMI	T ADJUSTME	NT			Final Asse	ssed Penalty	\$386,918
DEFE					20.0%	Reduction	Adjustment	-\$77,383
Reduces	the Final Assessed Pe		ed percentage. Deferral offered for	expedite	d settlement.			
PAYA	BLE PENALT	Υ						\$309,535

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

Respondent INEOS USA LLC (PCW No. 1 of 4)

Case ID No. 60882

Reg. Ent. Reference No. RN100238708

Media Air

Enf. Coordinator Danielle Porras

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

Component	Number of	Number	Adjust.
NOVs	Written notices of violation ("NOVs") with same or similar violations as those in the current enforcement action (number of NOVs meeting criteria)	3	15%
	Other written NOVs	3	6%
	Any agreed final enforcement orders containing a denial of liability (number of orders meeting criteria)	3	60%
Orders	Any adjudicated final enforcement orders, agreed final enforcement orders without a denial of liability, or default orders of this state or the federal government, or any final prohibitory emergency orders issued by the commission	0	0%
Judgments	Any non-adjudicated final court judgments or consent decrees containing a denial of liability of this state or the federal government (number of judgments or consent decrees meeting criteria)	0	0%
and Consent Decrees	Any adjudicated final court judgments and default judgments, or non-adjudicated final court judgments or consent decrees without a denial of liability, of this state or the federal government		0%
Convictions	Any criminal convictions of this state or the federal government (number of counts)	0	0%

Letters notifying the executive director of an intended audit conducted under the Texas Environmental, Health, and Safety Audit Privilege Act, 74th Legislature,

Disclosures of violations under the Texas Environmental, Health, and Safety Audit Privilege Act, 74th Legislature, 1995 (number of audits for which violations were

Chronic excessive emissions events (number of events)

1995 (number of audits for which notices were submitted)

	Environmental management systems in place for one year or more	No	0%
Other	Voluntary on-site compliance assessments conducted by the executive director under a special assistance program	No	0%
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)

0

1

1

0%

-1%

-2%

78%

>> Repeat Violator (Subtotal 3)

Emissions

Audits

No

disclosed)

Adjustment Percentage (Subtotal 3)

0 /0

>> Compliance History Person Classification (Subtotal 7)

Satisfactory Performer

Adjustment Percentage (Subtotal 7)

0%

>> Compliance History Summary

Compliance History Notes Enhancement for three NOVs with same or similar violations, three NOVs with dissimilar violations, and three orders containing a denial of liability. Reduction for one Notice of Intent to conduct an audit and one Disclosure of Violations.

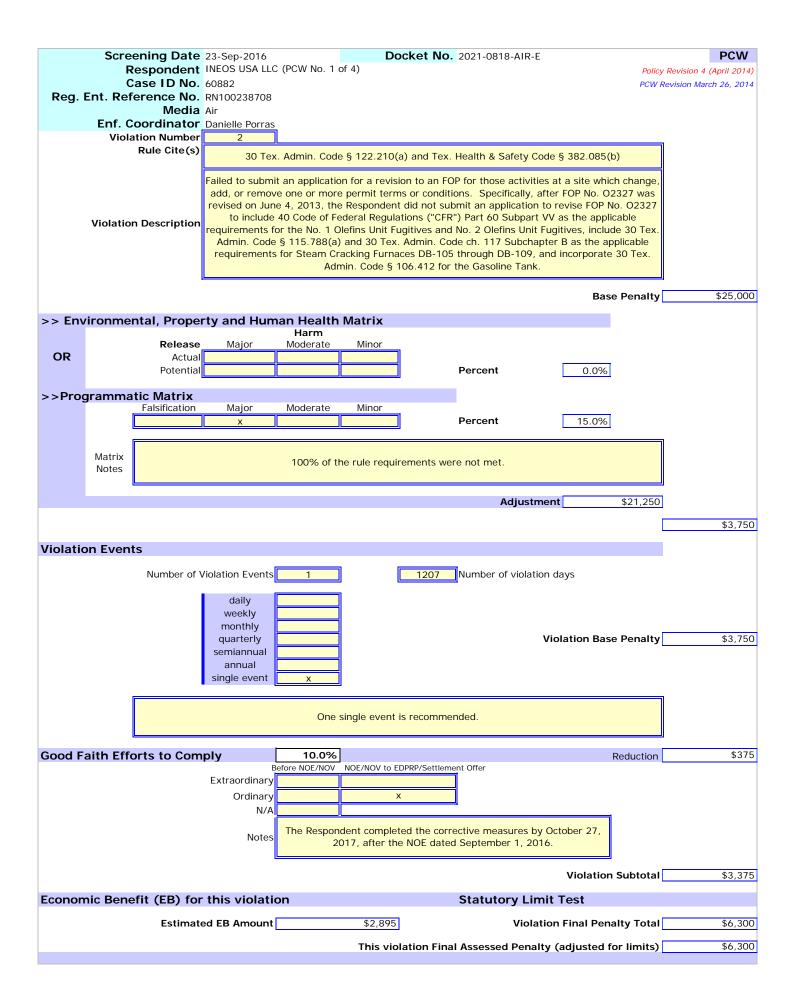
Total Compliance History Adjustment Percentage (Subtotals 2, 3, & 7)

>> Final Compliance History Adjustment

Final Adjustment Percentage *capped at 100%

78%

	E	conomic	Benefit	Wo	rksheet		
Respondent	INEOS USA LL	.C (PCW No. 1 of	4)				
Case ID No.	60882						
Reg. Ent. Reference No.							
Media							Years of
Violation No.						Percent Interest	Depreciation
Violation No.	•					5.0	15
	Itom Cost	Date Required	Final Date	Yrs	Interest Saved	Costs Saved	EB Amount
	rtem cost	Date Required	rinai Date	115	interest Saveu	cosis saveu	EB AIIIOUIII
Item Description							
Delayed Costs		1		1	1		
Equipment				0.00	\$0	\$0	\$0
Buildings				0.00	\$0	\$0	\$0
Other (as needed)				0.00	\$0	\$0	\$0
Engineering/Construction				0.00	\$0	\$0	\$0
Land				0.00	\$0	n/a	\$0
Record Keeping System				0.00	\$0	n/a	\$0
Training/Sampling				0.00	\$0	n/a	\$0
Remediation/Disposal				0.00	\$0 \$0	n/a	\$0
Permit Costs Other (as needed)	\$10,000	8-Jan-2015	4-May-2015	0.00	\$U \$159	n/a n/a	\$0 \$159
Notes for DELAYED costs		s for the Olefins 1	API Separator,	EPN FA		omply with the benz Required is the firs mpliance.	
Avoided Costs	ANNU	ALIZE avoided c	osts before en	tering	item (except for	one-time avoided	d costs)
Disposal				0.00	\$0	\$0	\$0
Personnel				0.00	\$0	\$0	\$0
Inspection/Reporting/Sampling				0.00	\$0	\$0	\$0
Supplies/Equipment				0.00	\$0	\$0	\$0
Financial Assurance				0.00	\$0	\$0	\$0
ONE-TIME avoided costs				0.00	\$0	\$0	\$0
Other (as needed)				0.00	\$0	\$0	\$0
Notes for AVOIDED costs							
Approx. Cost of Compliance		\$10,000			TOTAL		\$159



	Ed	conomic	Benefit	Wo	rksheet		
Respondent		C (PCW No. 1 of					
Case ID No.	60882						
Reg. Ent. Reference No.							
Media	Air					D	Years of
Violation No.	2					Percent Interest	Depreciation
						5.0	
	Item Cost	Date Required	Final Date	Yrs	Interest Saved	Costs Saved	EB Amount
Item Description	rtem oost	Date Required	i iliai bate	113	micrest Saveu	oosis saveu	LD Amount
rtem bescription							
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	ΦE 000	1 4 2007	27.0-+ 2017	0.00	\$0	n/a	\$0 \$2,895
Permit Costs Other (as needed)	\$5,000	1-Apr-2006	27-Oct-2017	0.00	\$2,895 \$0	n/a n/a	\$2,895 \$0
Notes for DELAYED costs	Estimated cost to obtain a revision for FOP No. 02327 that included 40 CFR Part 60 Subpart VV as the applicable requirements for the No. 1 Olefins Unit Fugitives and No. 2 Olefins Unit Fugitives; included 30 Tex. Admin. Code § 115.788(a) and 30 Tex. Admin. Code ch. 117 Subchapter B as applicable requirements for Steam Cracking Furnaces DB-105 through DB-109; incorporated 30 Tex. Admin. Code § 106.412 for the Gasoline Tank; added Emergency Generator DM-177 that was constructed on or about April 1, 2006; and added Engines OLE2COMP2, UTILCOMP4, UTILCOMP5, and UTILCOMP6 that were replaced in April 2013. The Date Required is the first date of non-compliance and the Final Date is the date of compliance.						
Avoided Costs	ANNUA	ALIZE avoided c	osts before er	tering	item (except for	one-time avoide	d costs)
Disposal				0.00	\$0	\$0	\$0
Personnel				0.00	\$0	\$0	\$0
Inspection/Reporting/Sampling				0.00	\$0	\$0	\$0
Supplies/Equipment				0.00	\$0	\$0	\$0
Financial Assurance				0.00	\$0 \$0	\$0 \$0	\$0
ONE-TIME avoided costs Other (as needed)				0.00	\$0 \$0	\$0 \$0	\$0 \$0
Notes for AVOIDED costs		1		0.00	υ ΨΟ	υ ΨΟ	ΨΟ
Approx. Cost of Compliance		\$5,000			TOTAL		\$2,895

	Screening Dat		Docket No. 2021-0818-AIR-E	PCW
		t INEOS USA LLC	(PCW No. 1 of 4)	Policy Revision 4 (April 2014)
Rea.	Case ID No Ent. Reference No			PCW Revision March 26, 2014
11191	Medi	a Air		
	Enf. Coordinato			
	Violation Numbe Rule Cite(s	\	Code SS 122 142(4) and 122 145(2)(4) FOR No. 02227 CTC	and
		2 30 Tex. Admin.	Code §§ 122.143(4) and 122.145(2)(A), FOP No. O2327, GTC, Tex. Health & Safety Code § 382.085(b)	and
		Failed to report	all instances of deviations. Specifically, the deviation reports fo	r the
		October 1, 201	through March 31, 2015 and April 1, 2015 through September	- 30,
	Violation Description		ring periods did not include the deviation for failing to submit an revise FOP No. O2327 to include 40 CFR Part 60 Subpart VV as	
		applicable requ	irements for the No. 1 Olefins Unit Fugitives and No. 2 Olefins Unit Fugitives	<mark>Jnit </mark>
			Fugitives.	
			Base Per	nalty \$25,000
>> En	vironmental, Prop	erty and Hum	an Health Matrix	
		_	Harm	
OR	Releas Actu		Moderate Minor	
	Potenti		Percent 0.0%	
>>Pro	ogrammatic Matrix			
////	Falsification		Moderate Minor	
			x Percent 1.0%	
	Matrix Notes	Less tha	n 30% of the rule requirements were not met.	
			Adjustment \$24	,750
				\$250
				,
Violati	ion Events			
	Number o	f Violation Events	2 329 Number of violation days	
		daily		
		weekly		
		monthly quarterly	Violation Base Per	nalty \$500
		semiannual	violation base i ci	larty \$300
		annual		
		single event	X	
			-	
			Two single events are recommended.	
Good I	Faith Efforts to Co	mply	0.0% Redu	ction \$0
Good	raitii Eiloits to coi		fore NOE/NOV NOE/NOV to EDPRP/Settlement Offer	CHOIT #0
		Extraordinary		
		Ordinary N/A	X	
			The Respondent does not meet the good faith criteria for	
		Notes	this violation.	
		<u> </u>		
			Violation Sub	total \$500
Econo	mic Benefit (EB) fo	or this violation	n Statutory Limit Tes	it
	Estima	ited EB Amount	\$649 Violation Final Penalty 1	Total \$890
	Estima	ited EB Amount	\$649 Violation Final Penalty 1 This violation Final Assessed Penalty (adjusted for lin	

	E	conomic	Benefit	Wα	rksheet		
Respondent		.C (PCW No. 1 of 4					
Case ID No.		(• /				
Reg. Ent. Reference No.							
							V
Media						Percent Interest	Years of
Violation No.	3						Depreciation
						5.0	15
	Item Cost	Date Required	Final Date	Yrs	Interest Saved	Costs Saved	EB Amount
Item Description		·					
i telli 2 eeei iptioli							
Delayed Costs							
Equipment	T T	1		0.00	\$0	\$0	\$0
Buildings				0.00	\$0	\$0 \$0	\$0 \$0
Other (as needed)		İ		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	30-Apr-2015	30-Sep-2020	5.42	\$407	n/a	\$407
Remediation/Disposal				0.00	\$0	n/a	\$0
Permit Costs				0.00	\$0	n/a	\$0
Other (as needed)	\$500	30-Apr-2015	1-Jan-2025	9.68	\$242	n/a	\$242
Notes for DELAYED costs	application to for the No implement frequent bas ensure that	o revise FOP No. Op. 1 Olefins Unit F a reasonable inquisis and expanding all instances of de	2327 to include ugitives and No uiry process for the review proce eviations are rep report was due	40 CFI 2 Olef the development to	R Part 60 Subpart ins Unit Fugitives (institution report proceinclude operators, in a timely manner	ne deviation for failing the deviation for failing the street of the str	e requirements ort) and to a on a more ers in order to es Required is
Avoided Costs	ANNUA	ALIZE avoided c	osts before en	tering	item (except for	one-time avoide	d costs)
Disposal				0.00	\$0	\$0	\$0
Personnel				0.00	\$0	\$0	\$0
Inspection/Reporting/Sampling				0.00	\$0	\$0	\$0
Supplies/Equipment				0.00	\$0	\$0	\$0
Financial Assurance				0.00	\$0	\$0	\$0
ONE-TIME avoided costs				0.00	\$0	\$0	\$0
Other (as needed)				0.00	\$0	\$0	\$0
Notes for AVOIDED costs							
Approx. Cost of Compliance		\$2,000			TOTAL		\$649

		ening Date				cket No. 2021-0818-AII	R-E	PCW
	R	espondent	INEOS USA LLC	(PCW No. 1	1 of 4)		Policy	Revision 4 (April 2014)
		ase ID No.					PCW R	evision March 26, 2014
Reg.	Ent. Ref		RN100238708					
		Media						
			Danielle Porras	i				
	Viola	ation Number						
		Rule Cite(s)	30 Tex. Admin.			15(b)(2)(F) and (c), and 1	1 1	
			Permit Nos. 95			. 1, FOP No. 02327, GTC a	nd STC No. 20,	
				and re.	x. Health & Sar	ety Code § 382.085(b)		
				•	•	ally, the Respondent excee		
	Violatio	n Description				/ 12.92 lbs/hr for one hour , EPN DB-106, resulting in	-	
					-	CO emissions.		
							Base Penalty	\$25,000
>> Env	vironme	ntal. Prope	rty and Hum	an Healt	h Matrix			
		, ,		Harm				
		Release	Major	Moderate	Minor			
OR		Actual			X			
		Potential				Percent 15	5.0%	
>>Pro	aramma	tic Matrix						
//FIU	yı arılına	Falsification	Major	Moderate	Minor			
						Percent (0.0%	
		Human health	or the environn	nent has be	en exposed to	insignificant amounts of po	llutants that did	
	Matrix Notes				•	environmental receptors a		
	Notes				violation.			
						Adjustment	\$21,250	
							Г	\$3,750
								,
Violati	on Even	ts						
				_	-			
		Number of \	violation Events	1		1 Number of viol	ation days	
			daily		-			
			weekly					
			monthly					
			quarterly	Х		Violation	n Base Penalty	\$3,750
			semiannual				_	
			annual					
			single event					
		One quarterly	event is recomi	mended for		non-compliance that occur	rred on January	
					17, 2015.			
			ı					
Good F	Faith Effo	orts to Com		25.09		ODDD (C-#1) Off	Reduction	\$937
			B Extraordinary	efore NOE/NO	v NOE/NOV to EI	OPRP/Settlement Offer		
			3					
			Ordinary	Х				
			Ordinary N/A		andont same l	ad the corrective	· on	
			N/A	The Respo	•	ed the corrective measures		
			,	The Respo	7, 2015, prior to	ed the corrective measures to the NOE dated September 2016.		
			N/A	The Respo	7, 2015, prior to	the NOE dated September		
			N/A	The Respo	7, 2015, prior to	o the NOE dated Septembe 2016.		\$2,813
Fooner	mic Rong	ofit (FR) for	N/A Notes	The Respo	7, 2015, prior to	o the NOE dated Septembe 2016. Viol	ation Subtotal	\$2,813
Econor	mic Bene	efit (EB) for	N/A	The Respo	7, 2015, prior to	o the NOE dated Septembe 2016.	ation Subtotal	\$2,813
Econor	mic Bene	,	N/A Notes	The Respo	7, 2015, prior to	o the NOE dated Septembe 2016. Viol Statutory I	ation Subtotal	\$2,813 \$5,738
Econor	mic Bene	,	N/A Notes	The Respo January 17	7, 2015, prior to	o the NOE dated Septembe 2016. Viol Statutory I	ation Subtotal Limit Test I Penalty Total	

	E	conomic	Benefit	Wo	rksheet		
Respondent	INEOS USA LL	C (PCW No. 1 of	4)				
Case ID No.	60882						
Reg. Ent. Reference No.							
Media							Years of
Violation No.						Percent Interest	Depreciation
Violation No.						5.0	15
	Itom Cost	Date Required	Final Data	Yrs	Interest Saved	Costs Saved	EB Amount
	rtem cost	Date Required	Final Date	115	interest Saveu	cosis saveu	EB AMOUNT
Item Description							
Delayed Costs							
Equipment				0.00	\$0	\$0	\$0
Buildings				0.00	\$0	\$0	\$0
Other (as needed)				0.00	\$0	\$0	\$0
Engineering/Construction				0.00	\$0	\$0	\$0
Land				0.00	\$0	n/a	\$0
Record Keeping System				0.00	\$0	n/a	\$0
Training/Sampling				0.00	\$0	n/a	\$0
Remediation/Disposal				0.00	\$0	n/a	\$0
Permit Costs				0.00	\$0	n/a	\$0
Other (as needed)	\$10,000	17-Jan-2015	17-Jan-2015	0.00	\$0	n/a	\$0
	Estimated co	st to adjust the fe	ed, fuel, and ox	vaen le	evels in order to co	mply with the CO he	ourly MAFR for
Notes for DELAYED costs						te of non-compliance	
Notes for BEEATED costs	the Steam on	deking ramace, L			of compliance.	te of flori compliant	e and the rinar
			Date is ti	ie date	or compliance.		
Avoided Costs	ANNUA	ALIZE avoided c	osts before en	tering	item (except for	one-time avoide	d costs)
Disposal				0.00	\$0	\$0	\$0
Personnel				0.00	\$0	\$0	\$0
Inspection/Reporting/Sampling				0.00	\$0	\$0	\$0
Supplies/Equipment				0.00	\$0	\$0	\$0
Financial Assurance				0.00	\$0	\$0	\$0
ONE-TIME avoided costs				0.00	\$0	\$0	\$0
Other (as needed)				0.00	\$0	\$0	\$0
Notes for AVOIDED costs							
Approx. Cost of Compliance		\$10,000			TOTAL		\$0

Screening Date			2021-0818-AIR-E	PCW
	INEOS USA LLC (PCW No.	1 of 4)	•	Revision 4 (April 2014)
Case ID No. Reg. Ent. Reference No.			PCW I	Revision March 26, 2014
Media				
Enf. Coordinator				
Violation Number Rule Cite(s)				Ī
Rule Cite(s)	30 Tex. Admin. Code 99 To		and (c), and 122.143(4), NSR	
		ex. Health & Safety Code § 3	O2327, GTC and STC No. 20, 82.085(b)	
		*		
	. ,	e MAER. Specifically, the Re	espondent exceeded the CO 98.10 lbs/hr for a total of four	
Violation Description	-	om October 2, 2014 to Janua		
	Cracking Furnace, EPN	N DB-107, resulting in 163.1 emissions.	8 lbs of unauthorized CO	
		erriissioris.		
			Base Penalty	\$25,000
Environmental Drane	rty and Uuman Haalt	th Matrix		
>> Environmental, Prope	Harm	ur wau ix		
OR Release				
Potential		X	Percent 15.0%	
_	,			
>>Programmatic Matrix Falsification	Major Moderate	e Minor		
			Percent 0.0%	
				ī
Matrix not exceed le			amounts of pollutants that did tal receptors as a result of the	
Notes	F	violation.		
		۸ ـ ۱ : ۰	\$21.250	
		Adju	ustment \$21,250	
				\$3,750
Violation Events				
Number of 1	Violation Events 1	3	Number of violation days	
Number of	Violation Events 1	<u> </u>	Number of violation days	
	daily			
	weekly monthly			
	quarterly		Violation Base Penalty	\$3,750
	semiannual x			
	annual single event	_		
	3 4 4 4 4			,
One semian		for the instances of non-cor	mpliance that occurred from	
	October 2,	2014 to January 14, 2015.		
Good Faith Efforts to Com	nply 25.09	2 /2	Reduction	\$937
Cood I altii Liioi ta to coii	Before NOE/NO			\$737
	Extraordinary			
	Ordinary x N/A			
		ondent completed the correc	tive measures on	
	· ·	4, 2015, prior to the NOE da		
		2016.		
			Violation Subtotal	40.010
			Violation Subtotal	\$2,813
Economic Benefit (EB) for	this violation			\$2,813
Economic Benefit (EB) for			Statutory Limit Test	
	ed EB Amount	\$142 V		\$2,813 \$5,738 \$5,738

	E(conomic	Benefit	VVO	rksheet		
Respondent	INEOS USA LL	C (PCW No. 1 of 4	!)				
Case ID No.	60882	•	•				
Reg. Ent. Reference No.							
Media							Years of
						Percent Interest	
Violation No.	5						Depreciation
						5.0	15
	Item Cost	Date Required	Final Date	Yrs	Interest Saved	Costs Saved	EB Amount
Item Description		•					
rtem bescription							
Dalassa d Oaasta							
Delayed Costs		1		0.00	Ι	Φ0	40
Equipment				0.00	\$0	\$0	\$0
Buildings				0.00	\$0 \$0	\$0	\$0
Other (as needed)						\$0 \$0	\$0
Engineering/Construction				0.00	\$0 \$0	n/a	\$0 \$0
Land Record Keeping System				0.00	\$0 \$0	n/a	\$0
Training/Sampling				0.00	\$0 \$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	2-Oct-2014	14-Jan-2015	0.28	\$142	n/a	\$142
Notes for DELAYED costs			B-107. The Da	te Requ		mply with the CO h te of non-compliand	
Avoided Costs	ANNU	ALIZE avoided co	osts before en	tering	item (except for	one-time avoide	d costs)
Disposal				0.00	\$0	\$0	\$0
Personnel				0.00	\$0	\$0	\$0
Inspection/Reporting/Sampling				0.00	\$0	\$0	\$0
Supplies/Equipment				0.00	\$0	\$0	\$0
Financial Assurance				0.00	\$0	\$0	\$0
ONE-TIME avoided costs				0.00	\$0	\$0	\$0
Other (as needed)				0.00	\$0	\$0	\$0
Notes for AVOIDED costs							
Approx. Cost of Compliance		\$10,000			TOTAL		\$142

		ening Date		Docket No. 2021-0818-AIR-E	PCW
				(PCW No. 1 of 4)	Policy Revision 4 (April 2014)
Dog		Case ID No. ference No.			PCW Revision March 26, 2014
Reg.	LIII. KEI	Media			
	Enf. C	coordinator	Danielle Porras		
	Viol	ation Number			
		Rule Cite(s)	30 Tex. Admin.	Code §§ 101.20(3), 116.115(b)(2)(F) and (c), and 122.143(4),	NSR
				and PSDTX854M2, SC No. 1, FOP No. O2327, GTC and STC No.	
				and Tex. Health & Safety Code § 382.085(b)	
			F 11 1 1		
				oly with the MAERs. Specifically, the Respondent exceeded the V bs/hr by 0.01 lb/hr for a total of two hours on October 19, 2014	
	Violatio	n Description		2014 and exceeded the CO MAER of 18.32 lbs/hr by 26.73 lbs/hr	
			·	ril 9, 2015 for the Steam Cracking Furnace, EPN DB-105, resulting trelease of 0.02 lb of VOC emissions and 26.73 lbs of CO emiss	_
			the diadthorize	a release of 0.02 ib of voc emissions and 20.75 ibs of 50 emiss	10113.
				Base Per	nalty \$25,000
					\$25,000
>> En	vironme	ntal, Prope	rty and Hum	an Health Matrix Harm	
		Release	Major	Moderate Minor	
OR		Actual		X	
		Potential		Percent 15.0%	
>>Pro	gramma	tic Matrix			
		Falsification	Major	Moderate Minor	
				Percent 0.0%	
		Human health	or the environr	nent has been exposed to insignificant amounts of pollutants tha	t did
	Matrix Notes			ective of human health or environmental receptors as a result o	
	Motes			violation.	
				Adjustment \$21	,250
					\$2.750
					\$3,750
Violati	ion Even	ts			
		Number of \	/iolation Events	1 Number of violation days	
			daily weekly		
			monthly		
			quarterly	Violation Base Per	nalty \$3,750
			semiannual	X	
			annual single event		
			onigio ovone		
		One semian	nual event is red	ommended for the instances of non-compliance that occurred fro	om
				October 19, 2014 to April 9, 2015.	
0- 1-	-:+L =cc			05.004	
Good F	raith Eff	orts to Com		25.0% Reduction Reduction NOE/NOV to EDPRP/Settlement Offer	ction \$937
			Extraordinary		
			Ordinary	X	
			N/A		
			Notes	The Respondent completed the corrective measures on	
				April 9, 2015, prior to the NOE dated September 1, 2016.	
			·	Violation Sub	total \$2,813
		a. /==:			
Econor	mic Bene	etit (EB) for	this violation	on Statutory Limit Tes	t
		Estimate	ed EB Amount	\$236 Violation Final Penalty T	otal \$5,738
				This violation Final Assessed Penalty (adjusted for lin	nits) \$5,738
				,	

	E	conomic	Benefit	Wo	rksheet		
Respondent	INEOS USA LL	C (PCW No. 1 of	4)				
Case ID No.	60882						
Rea. Ent. Reference No.	RN100238708						
Media							Years of
Violation No.						Percent Interest	Depreciation
						5.0	15
	Item Cost	Date Required	Final Date	Yrs	Interest Saved	Costs Saved	EB Amount
Item Description							
,							
Delayed Costs							
Equipment				0.00	\$0	\$0	\$0
Buildings				0.00	\$0	\$0	\$0
Other (as needed)				0.00	\$0	\$0	\$0
Engineering/Construction				0.00	\$0	\$0	\$0
Land				0.00	\$0	n/a	\$0
Record Keeping System				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	19-Oct-2014	9-Apr-2015	0.47	\$236	n/a	\$236
Notes for DELAYED costs	MAERs fo	r the Steam Crac compl	king Furnace, E iance and the Fi	PN DB- nal Dat	105. The Date Receis the date of co		te of non-
Avoided Costs	ANNUA	ALIZE avoided c	osts before en	-		one-time avoide	d costs)
Disposal				0.00	\$0	\$0	\$0
Personnel				0.00	\$0	\$0	\$0
Inspection/Reporting/Sampling				0.00	\$0	\$0	\$0
Supplies/Equipment				0.00	\$0	\$0	\$0
Financial Assurance				0.00	\$0	\$0	\$0
ONE-TIME avoided costs				0.00	\$0	\$0	\$0
Other (as needed)				0.00	\$0	\$0	\$0
Notes for AVOIDED costs							
Approx. Cost of Compliance		\$10,000			TOTAL		\$236

		ening Date				cket No.	2021-0818-AIR-E		PCW
		-	INEOS USA LLO	C (PCW No. 1	l of 4)				Revision 4 (April 2014)
		ase ID No.						PCW R	Revision March 26, 2014
Reg. I	ent. ket		RN100238708						
	Enf C	Media	Danielle Porras						
		tion Number		Ī					
	•1010	Rule Cite(s)							
							and (c), and 122.14		
			Permit Nos. 9		x. Health & Sa		. 02327, GTC and ST 382 085(b)	C No. 20,	
				and re.	x: ricaitir & Sa	cry code 3	302.003(b)		
			Failed to cor	nply with the	MAER. Speci	fically, the F	Respondent exceeded	the CO	
					•	-	1.87 lbs/hr for a tota		
	Violatio	n Description		-			oruary 9, 2015 for the		
			Cracking i	·urnace, EPN		suiting in 3 sions.	.75 lbs of unauthorize	ea CO	
					erris	310113.			
							Ras	e Penalty	\$25,000
							Das	c i charry	\$20,000
>> Env	/ironme	ntal, Prope	rty and Hun	nan Healt Harm	h Matrix				
		Release	Major	Moderate	Minor				
OR		Actual			х				
		Potential					Percent 15.0%		
s s Droc	~ ~ ~ ~ ~ ~ ~	tio Motrix							
>>P100	gi amma	tic Matrix Falsification	Major	Moderate	Minor				
			. ,				Percent 0.0%		
	Matrix	Human health	or the environ	ment has be	en exposed to	insignificant	amounts of pollutant	ts that did	
	Notes	not exceed lev	els that are pro	tective of hu		environme	ntal receptors as a re	sult of the	
					violation.				
						Ad	justment	\$21,250	
							,	+=-,===	
									\$3,750
Violatio	on Even								
		ts							
					= 7		ā		
			/iolation Events	1]]	4	Number of violation	days	
				1		4	Number of violation	days	
			/iolation Events daily weekly	1		4	Number of violation	days	
			daily	1		4	Number of violation	days	
			daily weekly monthly quarterly	1 X		4	Number of violation Violation Base	,	\$3,750
			daily weekly monthly quarterly semiannual			4		,	\$3,750
			daily weekly monthly quarterly semiannual annual			4		,	\$3,750
			daily weekly monthly quarterly semiannual			4		,	\$3,750
		Number of \	daily weekly monthly quarterly semiannual annual single event	X	or the instance	4	Violation Base	e Penalty	\$3,750
		Number of \	daily weekly monthly quarterly semiannual annual single event	x pmmended f	or the instance		Violation Base	e Penalty	\$3,750
		Number of \	daily weekly monthly quarterly semiannual annual single event	x pmmended f			Violation Base	e Penalty	\$3,750
Good Fa	aith Effe	Number of \	daily weekly monthly quarterly semiannual annual single event	x Dommended f November 21	1, 2014 to Feb	uary 9, 201	Violation Base mpliance that occurre 5.	e Penalty	\$3,750 \$3,750
Good Fa	aith Effo	Number of N	daily weekly monthly quarterly semiannual annual single event	x pmmended f	1, 2014 to Feb	uary 9, 201	Violation Base mpliance that occurre 5.	e Penalty	
Good Fa	aith Effo	Number of N	daily weekly monthly quarterly semiannual annual single event erly event is received.	x pmmended f November 21 25.09 Before NOE/NO	1, 2014 to Feb	uary 9, 201	Violation Base mpliance that occurre 5.	e Penalty	
Good Fa	aith Effe	Number of N	daily weekly monthly quarterly semiannual annual single event erly event is rece ply Extraordinary Ordinary	x Dommended f November 21	1, 2014 to Feb	uary 9, 201	Violation Base mpliance that occurre 5.	e Penalty	
Good Fa	aith Effo	Number of N	daily weekly monthly quarterly semiannual annual single event erly event is received.	x pommended f November 21 25.09 Sefore NOE/NO	6 NOE/NOV to E	DPRP/Settleme	Wiolation Base mpliance that occurre 5.	e Penalty	
Good Fa	aith Effo	Number of N	daily weekly monthly quarterly semiannual annual single event erly event is rece ply Extraordinary Ordinary	x Dommended f November 21 25.09 Before NOE/NO X The Response	6 NOE/NOV to E	DPRP/Settleme	Violation Base mpliance that occurre 5.	e Penalty	
Good Fa	aith Effo	Number of N	daily weekly monthly quarterly semiannual annual single event erly event is rece ply Extraordinary Ordinary N/A	x Dommended f November 21 25.09 Before NOE/NO X The Response	A NOE/NOV to E NOME COMPLETE NOTE: The complete	DPRP/Settleme	wpliance that occurre 5. ent Offer ective measures on	e Penalty	
Good Fa	aith Effe	Number of N	daily weekly monthly quarterly semiannual annual single event erly event is rece ply Extraordinary Ordinary N/A	x Dommended f November 21 25.09 Before NOE/NO X The Response	A NOE/NOV to E NOME COMPLETE NOTE: The complete	DPRP/Settleme	wpliance that occurre 5. ent Offer ective measures on lated September 1,	ed from	\$937
		One quarte	daily weekly monthly quarterly semiannual annual single event erly event is record ply Extraordinary Ordinary N/A Notes	x pommended f November 21 25.09 sefore NOE/NOO x The Respo	A NOE/NOV to E NOME COMPLETE NOTE: The complete	DPRP/Settleme	wpliance that occurre 5. ent Offer ective measures on lated September 1,	ed from Reduction	
		One quarte	daily weekly monthly quarterly semiannual annual single event erly event is rece ply Extraordinary Ordinary N/A	x pommended f November 21 25.09 sefore NOE/NOO x The Respo	A NOE/NOV to E NOME COMPLETE NOTE: The complete	DPRP/Settleme	wpliance that occurre 5. ent Offer ective measures on lated September 1,	ed from Reduction	\$937
		One quarte	daily weekly monthly quarterly semiannual annual single event erly event is record ply Extraordinary Ordinary N/A Notes	x pommended f November 21 25.09 gefore NOE/NOV x The Respo	A NOE/NOV to E NOME COMPLETE NOTE: The complete	pprep/settlement of the NOE of the NOE of 2016.	wpliance that occurre 5. ent Offer ective measures on lated September 1,	ed from Reduction Subtotal	\$937
		One quarte	daily weekly monthly quarterly semiannual annual single event erly event is rece ply Extraordinary Ordinary N/A Notes	x pmmended f November 21 25.09 Before NOE/NOV X The Respo	NOE/NOV to E nodent complet 2, 2015, prior t	pprep/settlements ed the correspondence NOE of the NOE of 2016.	wiolation Base mpliance that occurre 5. ent Offer ective measures on lated September 1, Violation Statutory Limit	ed from Reduction Subtotal Test alty Total	\$937

	E	conomic	Benefit	Wo	rksheet		
Respondent	INEOS USA LL	C (PCW No. 1 of	4)				
Case ID No.	60882						
Rea. Ent. Reference No.	RN100238708						
Media							Years of
Violation No.	7					Percent Interest	Depreciation
						5.0	15
	Item Cost	Date Required	Final Date	Yrs	Interest Saved	Costs Saved	EB Amount
Item Description		·					
1 to 2 cool .pc.							
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	21-Nov-2014	9-Feb-2015	0.22	\$110	n/a	\$110
	Estimated cos	st to adjust the fe	ed, fuel, and ox	ygen le	evels in order to co	mply with the CO h	ourly MAER for
Notes for DELAYED costs	the Steam C	racking Furnace, I	EPN DDB-102A.	The D	ate Required is the	e first date of non-co	ompliance and
			the Final Date	is the	date of compliance	э.	
Avaidad Casts	ANNUL	NII7E avoided a	asts hafara an	toring	itam (avaant far	one-time avoide	d aasts)
Avoided Costs	ANNUA	ALIZE avoided c	osts before en				
Disposal				0.00	\$0	\$0 \$0	\$0
Personnel Inspection/Reporting/Sampling				0.00	\$0 \$0	\$0 \$0	\$0 \$0
Supplies/Equipment				0.00	\$0	\$0 \$0	\$0 \$0
Financial Assurance				0.00	\$0	\$0	\$0 \$0
ONE-TIME avoided costs				0.00	\$0	\$0	\$0 \$0
Other (as needed)				0.00	\$0	\$0	\$0
other (as needed)		JI		0.00	Ι ΨΟ	Ψ0	Ψ0
Notes for AVOIDED costs							
		-				_	1
Approx. Cost of Compliance		\$10,000			TOTAL		\$110

	reening Date	23-3ep-2010	Docket No. 2021-0818-AIR-E	PCW
	-	INEOS USA LLC (PO	CW No. 1 of 4)	Policy Revision 4 (April 2014)
D	Case ID No.			PCW Revision March 26, 2014
Reg. Ent. F	Reference No.			
En f	Media			
	. Coordinator iolation Number			
V			d- 66 101 20(2) 11/ 11F(F)(2)(F) 1 (-) 1 122 142(4)	NCD
	Kule Cite(3)		de §§ 101.20(3), 116.115(b)(2)(F) and (c), and 122.143(4), d PSDTX854M2, SC No. 1, FOP No. 02327, GTC and STC No.	
		Permit Nos. 35 am	and Tex. Health & Safety Code § 382.085(b)	20,
			y with the MAERs. Specifically, the Respondent exceeded the	
			'NOx") MAER of 26.60 lbs/hr by a range from 0.01 lb/hr to 1.	
Viala	tion December		52 hours on 11 days from December 2, 2014 to January 8, 2	
Viola	tion Description		CO MAER of 7.03 lbs/hr by a range from 0.41 lb/hr to 7.66 lb e hours on three days from February 8, 2015 to March 18, 20	
			racking Furnace, EPN DDB-102B, resulting in the unauthorize	
			19.66 lbs of NOx emissions and 10.72 lbs of CO emissions.	
			Base Per	nalty \$25,000
				ψ <u>2</u> 0/000
>> Environr	nental, Prope	rty and Human		
	Release		Harm oderate Minor	
OR	Actual		X	
	Potential		Percent 15.0%	
		<u> </u>		
>>Programi	matic Matrix			
	Falsification	Major M	oderate Minor	
			Percent 0.0%	
Matr	Y		t has been exposed to insignificant amounts of pollutants that	
Note	s not exceed le	veis that are protect	ive of human health or environmental receptors as a result o violation.	i the
			violation.	
			Adjustment \$21	,250
				\$3,750
				\$5,750
Violation Ev	ante			\$3,730
Violation Ev	ents			\$3,730
Violation Ev		Violation Events	1 14 Number of violation days	\$5,730
Violation Eve		Violation Events	1 Number of violation days	\$3,730
Violation Eve		Violation Events	1 Number of violation days	\$3,730
Violation Eve		daily weekly	1 14 Number of violation days	\$3,730
Violation Ev		daily weekly monthly		
Violation Ev		daily weekly monthly quarterly	Violation Base Per	
Violation Ev		daily weekly monthly quarterly semiannual		
Violation Ev		daily weekly monthly quarterly semiannual annual	Violation Base Per	
Violation Ev		daily weekly monthly quarterly semiannual	Violation Base Per	
Violation Ev	Number of	daily weekly monthly quarterly semiannual annual single event	Violation Base Per	s3,750
Violation Ev	Number of	daily weekly monthly quarterly semiannual annual single event	Violation Base Per	s3,750
Violation Ev	Number of	daily weekly monthly quarterly semiannual annual single event	Violation Base Per	s 3,750
	Number of Volume	daily weekly monthly quarterly semiannual annual single event nual event is recommered.	Wiolation Base Per x	salty \$3,750
	Number of	daily weekly monthly quarterly semiannual annual single event nual event is recomment	Violation Base Per	salty \$3,750
	Number of Volume	daily weekly monthly quarterly semiannual annual single event nual event is recomment	Violation Base Per x mended for the instances of non-compliance that occurred from the instance occur	salty \$3,750
	Number of Volume	daily weekly monthly quarterly semiannual annual single event nual event is recome Fet aply Extraordinary	whended for the instances of non-compliance that occurred from the pruary 2, 2014 to March 18, 2015. 25.0% Reduce the instances of non-compliance that occurred from the pruary 2, 2014 to March 18, 2015. Reduce the instances of non-compliance that occurred from the pruary 2, 2014 to March 18, 2015.	salty \$3,750
	Number of Volume	daily weekly monthly quarterly semiannual annual single event nual event is recomment Fet apply Before	Violation Base Per x mended for the instances of non-compliance that occurred from the instance occur	salty \$3,750
	Number of Volume	daily weekly monthly quarterly semiannual annual single event nual event is recome Fet ply Extraordinary Ordinary N/A	whended for the instances of non-compliance that occurred from the pruary 2, 2014 to March 18, 2015. 25.0% Reduce NOE/NOV NOE/NOV to EDPRP/Settlement Offer X	salty \$3,750
	Number of Volume	daily weekly monthly quarterly semiannual annual single event nual event is recome Fet ply Extraordinary Ordinary N/A Th	whended for the instances of non-compliance that occurred from the pruary 2, 2014 to March 18, 2015. 25.0% Reduce the instances of non-compliance that occurred from the pruary 2, 2014 to March 18, 2015. Reduce the instances of non-compliance that occurred from the pruary 2, 2014 to March 18, 2015.	salty \$3,750
	Number of Volume	daily weekly monthly quarterly semiannual annual single event nual event is recome Fet ply Extraordinary Ordinary N/A Th	when ded for the instances of non-compliance that occurred from the pruary 2, 2014 to March 18, 2015. 25.0% Reduce the instances of non-compliance that occurred from the pruary 2, 2014 to March 18, 2015. Reduce the instances of non-compliance that occurred from the pruary 2, 2014 to March 18, 2015. Reduce the instances of non-compliance that occurred from the pruary 2, 2014 to March 18, 2015.	salty \$3,750
	Number of Volume	daily weekly monthly quarterly semiannual annual single event nual event is recome Fet ply Extraordinary Ordinary N/A Th	when ded for the instances of non-compliance that occurred from the instances occurred from the instances of non-compliance that occurred from the instances occ	extion \$937
	Number of Volume	daily weekly monthly quarterly semiannual annual single event nual event is recome Fet ply Extraordinary Ordinary N/A Th	when the instances of non-compliance that occurred from the instances occurred from the instance occurred from the instance occurred from the instance occurred	extion \$937
Good Faith E	One semian	daily weekly monthly quarterly semiannual annual single event nual event is recome Fet ply Extraordinary Ordinary N/A Th	when ded for the instances of non-compliance that occurred from the instances occurred from the instances of non-compliance that occurred from the instances occ	salty \$3,750
Good Faith E	One semian	daily weekly monthly quarterly semiannual annual single event nual event is recome Fet ply Extraordinary Ordinary N/A Notes The	wended for the instances of non-compliance that occurred from the pruary 2, 2014 to March 18, 2015. Reduce NOE/NOV NOE/NOV to EDPRP/Settlement Offer X Be Respondent completed the corrective measures on arch 18, 2015, prior to the NOE dated September 1, 2016. Violation Subtactions of non-compliance that occurred from the pruary 2, 2014 to March 18, 2015. Reduce the provided Head of the corrective measures on arch 18, 2015, prior to the NOE dated September 1, 2016. Violation Subtactions of non-compliance that occurred from the pruary 2, 2014 to March 18, 2015. Reduce the provided Head of the provided Head	salty \$3,750 com \$937 cotal \$2,813
Good Faith E	One semian	daily weekly monthly quarterly semiannual annual single event nual event is recome Fet apply Extraordinary Ordinary N/A Notes Th	when ded for the instances of non-compliance that occurred from the instances occurred from the instances of non-compliance that occurred from the instances occurred from the instances of non-compliance that occurred from the instances occurred f	salty \$3,750 com \$937 cotal \$2,813

	E(conomic	Benefit	Wo	rksheet		
Respondent	INEOS USA LL	C (PCW No. 1 of 4	1)				
Case ID No.	60882						
Reg. Ent. Reference No.							
Media							Years of
1110 0110						Percent Interest	Depreciation
Violation No.	8						
						5.0	15
	Item Cost	Date Required	Final Date	Yrs	Interest Saved	Costs Saved	EB Amount
Item Description							
110 2 0001. p 0							
Delayed Costs							
Equipment		1		0.00	\$0	\$0	\$0
Buildings				0.00	\$0 \$0	\$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	2-Dec-2014	18-Mar-2015	0.29	\$145	n/a	\$145
Notes for DELAYED costs	MAERs for	the Steam Cracki compl	ng Furnace, EPI iance and the Fi	N DDB- nal Dat	102B. The Date R e is the date of co	•	date of non-
Avoided Costs	ANNUA	ALIZE avoided c	osts before er	tering	item (except for	one-time avoide	d costs)
Disposal				0.00	\$0	\$0	\$0
Personnel				0.00	\$0	\$0	\$0
Inspection/Reporting/Sampling				0.00	\$0	\$0	\$0
Supplies/Equipment				0.00	\$0	\$0	\$0
Financial Assurance				0.00	\$0	\$0	\$0
ONE-TIME avoided costs				0.00	\$0	\$0	\$0
Other (as needed)				0.00	\$0	\$0	\$0
Notes for AVOIDED costs							
Approx. Cost of Compliance		\$10,000			TOTAL		\$145

			23-Sep-2016		Doo	ket No. 2	2021-0818-AIR-E		PCW
	R	espondent	INEOS USA LLC	(PCW No. 1 of	4)			Policy	Revision 4 (April 2014)
		ase ID No.						PCW R	Pevision March 26, 2014
Reg.	Ent. Ref	erence No.	RN100238708						
		Media							
			Danielle Porras	i					
	Viola	tion Number							
		Rule Cite(s)	30 Tex. Admin.	Code §§ 101.2	20(3), 116.1	5(b)(2)(F)	and (c), and 122.14	3(4), NSR	
				and PSDTX85	4M2, SC No.	1, FOP No. (O2327, GTC and ST		
				and Tex. F	lealth & Safe	ty Code § 3	82.085(b)		
					•	J	espondent exceeded		
	Violatio	n Description		,			n October 21, 2014		
		-	Steam Cracking	g Furnace, EPN	emiss	-	23.24 lbs of unauthor	orizea CO	
					CITII33	0113.			
							Base	Penalty	\$25,000
_	_								
>> En	vironme	ntal, Propei	rty and Hum		Matrix				
		Release	Major	Harm Moderate	Minor				
OR		Actual		Woderate	Х				
		Potential			<u> </u>	F	Percent 15.0%		
>>Pro	gramma	tic Matrix							
		Falsification	Major	Moderate	Minor				
						F	Percent 0.0%		
	Matrix				•	-	amounts of pollutant		
	Notes	not exceed lev	els that are pro			environment	tal receptors as a res	sult of the	
					violation.				
						Λdiı	ustment	\$21,250	
						Aujo	astricit	Ψ21,200	
									\$3,750
	=	• .							
violati	on Even	ts							
		Number of \	/iolation Events	1		1	Number of violation of	davs	
		Number of V	Holdtion Events	'	<u> </u>		variable of violation (adys	
			daily						
			weekly						
			weekly	X			Violation Base	e Penalty	\$3,750
			weekly monthly quarterly semiannual	X			Violation Base	e Penalty	\$3,750
			weekly monthly quarterly semiannual annual	X			Violation Base	e Penalty	\$3,750
			weekly monthly quarterly semiannual	X			Violation Base	e Penalty	\$3,750
			weekly monthly quarterly semiannual annual	X			Violation Base	e Penalty	\$3,750
		One quarterly	weekly monthly quarterly semiannual annual single event	mended for the		non-complia	Violation Base	-	\$3,750
		One quarterly	weekly monthly quarterly semiannual annual single event	mended for the	instance of r 21, 2014.	non-complia		-	\$3,750
			weekly monthly quarterly semiannual annual single event	mended for the		non-complia		-	
Good F	aith Effo	One quarterly	weekly monthly quarterly semiannual annual single event	mended for the	21, 2014.		nce that occurred or	-	\$3,750 \$937
Good F	aith Effo		weekly monthly quarterly semiannual annual single event	mended for the			nce that occurred or	o October	
Good F	aith Effo		weekly monthly quarterly semiannual annual single event vevent is recommon	mended for the 25.0% efore NOE/NOV	21, 2014.		nce that occurred or	o October	
Good F	aith Effo		weekly monthly quarterly semiannual annual single event event is recommon	mended for the	21, 2014.		nce that occurred or	o October	
Good F	aith Effo		weekly monthly quarterly semiannual annual single event vevent is recommon	25.0% efore NOE/NOV 1	21, 2014.	PRP/Settlemen	nce that occurred or	o October	
Good F	aith Effo		weekly monthly quarterly semiannual annual single event event is recomm ply Extraordinary Ordinary N/A	25.0% efore NOE/NOV 1	21, 2014.	PRP/Settlemen	nce that occurred or t Offer	o October	
Good F	aith Effo		weekly monthly quarterly semiannual annual single event event is recommon	25.0% efore NOE/NOV 1	21, 2014. NOE/NOV to EDI ent complete 014, prior to	d the correct the NOE da	nce that occurred or	o October	
Good F	aith Effo		weekly monthly quarterly semiannual annual single event event is recomm ply Extraordinary Ordinary N/A	25.0% efore NOE/NOV 1	21, 2014. NOE/NOV to EDI ent complete 014, prior to	PRP/Settlemen	nce that occurred or t Offer	o October	
Good F	aith Effo		weekly monthly quarterly semiannual annual single event event is recomm ply Extraordinary Ordinary N/A	25.0% efore NOE/NOV 1	21, 2014. NOE/NOV to EDI ent complete 014, prior to	d the correct the NOE da	nce that occurred or t Offer	October Reduction	
		orts to Com	weekly monthly quarterly semiannual annual single event event is recommendate Extraordinary Ordinary N/A Notes	25.0% efore NOE/NOV X The Responde October 21, 2	21, 2014. NOE/NOV to EDI ent complete 014, prior to	d the correct the NOE da 016.	t Offer vitive measures on the September 1,	October Reduction	\$937
		orts to Com	weekly monthly quarterly semiannual annual single event event is recomm ply Extraordinary Ordinary N/A	25.0% efore NOE/NOV X The Responde October 21, 2	21, 2014. NOE/NOV to EDI ent complete 014, prior to	d the correct the NOE da 016.	t Offer	October Reduction	\$937
		orts to Com	weekly monthly quarterly semiannual annual single event event is recommended ply Extraordinary Ordinary N/A Notes	25.0% efore NOE/NOV X The Responde October 21, 2	21, 2014. NOE/NOV to EDI ent complete 014, prior to 2	d the correct the NOE da 016.	t Offer to Offer violation Statutory Limit	October Reduction Subtotal	\$937 \$2,813
		orts to Com	weekly monthly quarterly semiannual annual single event event is recommendate Extraordinary Ordinary N/A Notes	z5.0% efore NOE/NOV t X The Responde October 21, 2	ent complete 014, prior to 2	d the correct the NOE da 016.	t Offer tive measures on steed September 1, Violation Statutory Limit iolation Final Pena	Subtotal Test	\$937
		orts to Com	weekly monthly quarterly semiannual annual single event event is recommended ply Extraordinary Ordinary N/A Notes	z5.0% efore NOE/NOV t X The Responde October 21, 2	ent complete 014, prior to 2	d the correct the NOE da 016.	t Offer to Offer violation Statutory Limit	Subtotal Test	\$937 \$2,813

	E	conomic	Benefit	Wo	rksheet		
Respondent	INEOS USA LL	C (PCW No. 1 of	4)				
Case ID No.	60882						
Rea. Ent. Reference No.	RN100238708						
Media							Years of
Violation No.						Percent Interest	Depreciation
						5.0	15
	Item Cost	Date Required	Final Date	Yrs	Interest Saved	Costs Saved	EB Amount
Item Description		·					
1 to 2 cool .pc.							
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	21-Oct-2014	21-Oct-2014	0.00	\$0	n/a	\$0
Notes for DELAYED costs			EPN DDB-102C.	The D		mply with the CO he e date of non-compl	
Avoided Costs	ANNUA	ALIZE avoided c	osts before en	tering	item (except for	one-time avoide	d costs)
Disposal				0.00	\$0	\$0	\$0
Personnel				0.00	\$0	\$0	\$0
Inspection/Reporting/Sampling				0.00	\$0	\$0	\$0
Supplies/Equipment				0.00	\$0	\$0	\$0
Financial Assurance				0.00	\$0	\$0	\$0
ONE-TIME avoided costs				0.00	\$0	\$0	\$0
Other (as needed)				0.00	\$0	\$0	\$0
Notes for AVOIDED costs							
Approx. Cost of Compliance		\$10,000			TOTAL		\$0

S	Screening Date			Docket No. 2021-0818-A	IR-E	PCW
		INEOS USA LLC (F	PCW No. 1 of 4)		Policy	Revision 4 (April 2014)
	Case ID No.				PCW R	evision March 26, 2014
Reg. Ent.	Reference No.					
Г.,	Media					
	nf. Coordinator Violation Number					
	Rule Cite(s)		L CC 447 44E(L)	(0)(5) 1() 1400440(4)	NCD D II N	
	Ruic Onc(3)	00 10/11 /10/11/11		(2)(F) and (c) and 122.143(4), C and STC No. 20, and Tex. H		
		101, 3C NO. 1,		e § 382.085(b)	ealth & Salety	
				. 3 002.000(2)		
				pecifically, the Respondent exc		
				m 6.94 lbs/hr to 64.51 lbs/hr f		
Viol	lation Description	,	•	15 to June 2, 2015 and on Aug , EPN DDB901B, resulting in 9		
		the No. 2 Olem		ized CO emissions.	,000.02 103 01	
					Base Penalty	\$25,000
					base Ferialty	\$25,000
>> Environ	mental, Proper	rty and Huma		•		
	Release	Major	Harm Moderate Minoi	-		
OR	Actual	Major I	x			
O.K	Potential		^	Percent 1	5.0%	
			, and the second		0.070	
>>Program	nmatic Matrix					
	Falsification	Major	Moderate Minor		0.004	
				Percent	0.0%	
	Lluman haalth	or the environme	nt has been syness	d to incignificant amounts of n	allutanta that did	
Mat	rriy		·	d to insignificant amounts of po th or environmental receptors		
Not	tes	cis that are protec	violatio	•	as a result of the	
				Adjustment	\$21,250	
					Г	\$3,750
					L	ψ0,700
Violation Ev	vents					
	Ni	/inlation Franks	1	Nh a m ofia		
	Number of V	/iolation Events	1	9 Number of vic	nation days	
		daily				
		weekly				
		monthly				
		quarterly	Х	Violatio	n Base Penalty	\$3,750
		semiannual				
		annual				
		single event				
	One quarterly	event is recomme	ended for the instan 26, 2015 to Augu	ces of non-compliance that occ	curred from May	
			20, 2013 to Augu	31 20, 2013.		
Cood Faith	Efforts to Com	nlv	2E 09/		Doduction	\$937
Good Faith	Efforts to Com		25.0% NOE/NOV	to EDPRP/Settlement Offer	Reduction	\$937
		Extraordinary	TO HOLINO			
		Ordinary	х			
		N/A				
		Ĭ.	he Respondent com	pleted the corrective measure	s on	
			•	or to the NOE dated Septembe		
				2016.		
				Vio	lation Subtotal	\$2,813
				Vic	nation Subtotal	\$∠,013
Economic B	Benefit (EB) for	this violation		Statutory	Limit Test	
	Estimate	ed EB Amount	\$	118 Violation Fina	al Penalty Total	\$5,738
			This violation Fi	nal Assessed Penalty (adju	sted for limits)	\$5,738

	E	conomic	Benefit	Wo	rksheet		
Respondent	INEOS USA LL	C (PCW No. 1 of	4)				
Case ID No.	60882						
Reg. Ent. Reference No.							
Media							Years of
Violation No.						Percent Interest	Depreciation
21012110111101						5.0	15
	Item Cost	Date Required	Final Date	Yrs	Interest Saved	Costs Saved	EB Amount
Item Description							
rtem bescription							
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	26-May-2015	20-Aug-2015	0.24	\$118	n/a	\$118
Notes for DELAYED costs	the No. 2 Ole	fins Unit Steam B	oiler, EPN DDB9 and the Final Da	01B. T	he Date Required ne date of compliar		on-compliance
Avoided Costs	ANNUA	ALIZE avoided c	osts before en	tering	item (except for	one-time avoide	d costs)
Disposal				0.00	\$0	\$0	\$0
Personnel				0.00	\$0	\$0	\$0
Inspection/Reporting/Sampling				0.00	\$0	\$0	\$0
Supplies/Equipment				0.00	\$0	\$0	\$0
Financial Assurance				0.00	\$0	\$0	\$0
ONE-TIME avoided costs				0.00	\$0	\$0	\$0
Other (as needed)				0.00	\$0	\$0	\$0
Notes for AVOIDED costs							
Approx. Cost of Compliance		\$10,000			TOTAL		\$118

	Date 23-Sep-2016	Docket No. 2021-0818-AIR-E	PCW
-	ndent INEOS USA LLC	(PCW No. 1 of 4)	Revision 4 (April 2014)
	D No. 60882	PCW I	Revision March 26, 2014
Reg. Ent. Reference			
	Media Air inator Danielle Porras		
Violation N			
	0:4-(-)	Codo SS 116 115(c) and 122 142(4) NSD Permit No. 101 SC No.	
	00 10/11/11/11	. Code §§ 116.115(c) and 122.143(4), NSR Permit No. 101, SC No. No. O2327, GTC and STC No. 20, and Tex. Health & Safety Code §	
	3.8.(2), 101	382.085(b)	
		· ·	
		with the emissions limit. Specifically, the Respondent exceeded the	
		mit of 0.037 pound per one million British thermal units ("lb/MMBtu")	
Violation Desc	-	gher heating value of the fuel on a 24-hour average by a range from u to 0.299 lb/MMBtu for a total of 172 hours on nine days from May	
		une 2, 2015 for the No. 2 Olefins Unit Steam Boiler, EPN DDB901B.	
		Base Penalty	\$25,000
		Base Felialty	\$23,000
>> Environmental,	Property and Hum		
R	Release Major	Harm Moderate Minor	
OR	Actual	Х	
P	Potential	Percent 15.0%	
Duo avo mono etie M	aduise		
>>Programmatic Markets	fication Major	Moderate Minor	
		Percent 0.0%	
			,
Matrix		nent has been exposed to insignificant amounts of pollutants that did	
Notes not ex	ceed levels that are prot	rective of human health or environmental receptors as a result of the	
		violation.	
		Adjustment \$21,250	
		, , , , , , , , , , , , , , , , , , ,	
			\$3,750
Violation Events			
Nun	nber of Violation Events	1 9 Number of violation days	
	daily		
	weekly		
	monthly		
	quarterly	X Violation Base Penalty	\$3,750
	semiannual		
	annual single event		
	Single event		
One o	quarterly event is recomm	mended for the instances of non-compliance that occurred from May	
		11, 2015 to June 2, 2015.	
			l
Good Faith Efforts to	. 3	25.0% Reduction	\$937
	Be Extraordinary	efore NOE/NOV NOE/NOV to EDPRP/Settlement Offer	
	Ordinary	V	
	N/A	X	
	Notes	The Respondent completed the corrective measures on June 2, 2015, prior to the NOE dated September 1, 2016.	
		Salis 2, 2013, prior to the NOL dated September 1, 2010.	
		Violation Subtotal	\$2,813
Economic Devertit (F	ID) for this citates		
Economic Benefit (E	tor this violation	on Statutory Limit Test	
E	Estimated EB Amount	\$30 Violation Final Penalty Total	\$5,738
		This violation Final Assessed Penalty (adjusted for limits)	\$5,738
		(44)	¥5,.30

	E	conomic	Benefit	Wo	rksheet		
Respondent	INEOS USA LL	C (PCW No. 1 of	4)				
Case ID No.	60882						
Rea. Ent. Reference No.	RN100238708						
Media							Years of
Violation No.	11					Percent Interest	Depreciation
						5.0	15
	Item Cost	Date Required	Final Date	Yrs	Interest Saved	Costs Saved	EB Amount
Item Description		•					
rtem Bescription							
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	11-May-2015	2-Jun-2015	0.06	\$30	n/a	\$30
	Estimated co	set to adjust the f	and fuel and o	vvaen l	avals in order to co	omply with the CO e	missions limit
Notes for DELAYED costs						equired is the first d	
Notes for DELAYED Costs	TOI THE INC					•	ate of flori-
		compi	iance and the F	mai Dat	te is the date of co	прпапсе.	
Avoided Costs	ANNUA	ALIZE avoided c	osts before er	tering	item (except for	one-time avoide	d costs)
Disposal				0.00	\$0	\$0	\$0
Personnel				0.00	\$0	\$0	\$0
Inspection/Reporting/Sampling				0.00	\$0	\$0	\$0
Supplies/Equipment				0.00	\$0	\$0	\$0
Financial Assurance				0.00	\$0	\$0	\$0
ONE-TIME avoided costs				0.00	\$0	\$0	\$0
Other (as needed)				0.00	\$0	\$0	\$0
No. 1 AVOIDED							
Notes for AVOIDED costs							
Approx. Cost of Committees		¢10.000	1		TOTAL		¢20
Approx. Cost of Compliance		\$10,000			TOTAL		\$30

		ening Date		Docket No. 2021-0818-AIR-E	PCW
		-		(PCW No. 1 of 4)	Policy Revision 4 (April 2014)
_		ase ID No.		ı	PCW Revision March 26, 2014
Reg.	Ent. Ref	erence No.			
	F f. O	Media			
			Danielle Porras		
	VIOI	ation Number Rule Cite(s)			
		Rule Cite(s)		Code §§ 117.340(j) and 122.143(4), FOP No. 02327, GTC and §	TC
				No. 1.A., and Tex. Health & Safety Code § 382.085(b)	
			Failed to record	the operating time for stationary internal combustion engines wi	th a
				elapsed run-time meter. Specifically, the Respondent did not eq	
	Violatio	n Description	Stationary Eng	ines DDM-904N, DM-177, PP3 MN1601, PP4 TN1601, DM-904N,	N-
				and AN-402 with non-resettable elapsed run time meters, but the	e
			ор	erating time for these engines were not being recorded.	
		'			
				Base Pena	alty \$25,000
>> En	vironme	ntal, Propei	rty and Hum	an Health Matrix	
				Harm	
OD		Release	Major	Moderate Minor	
OR		Actual		Percent 0.0%	
		Potential		Percent 0.0%	
>>Pro	gramma	tic Matrix			
		Falsification	Major	Moderate Minor	
				X Percent 1.0%	
	Matrix		Less tha	in 30% of the rule requirements were not met.	
	Notes		2033 1110	in 30% of the rule requirements were not met.	
				Adjustment \$24,	750
					\$250
Violati	on Even	ts			
		Number of \	/iolation Events	8 151 Number of violation days	
				- Tot Indiano di Modalion dage	
			daily		
			weekly		
			monthly		
			quarterly	Violation Base Pena	alty \$2,000
			semiannual annual		
			single event	x	
			9		
			Eight single ev	vents are recommended (one event for each engine).	
Good F	aith Effo	orts to Com		25.0% Reduc	ion \$500
				efore NOE/NOV NOE/NOV to EDPRP/Settlement Offer	
			Extraordinary		
			Ordinary	X	
			N/A		
			Notes	The Respondent completed the corrective measures by	
				April 15, 2017, prior to the NOE dated April 28, 2017.	
			<u>u</u>		
				Violation Subto	otal \$1,500
Econor	mic Bene	efit (EB) for	this violation	on Statutory Limit Test	
		Ectimate	ed EB Amount	\$31 Violation Final Penalty To	otal \$3,060
		Latinda	JU ED AIIIOUIIL	violation rinal relialty it	φ3,000
				This violation Final Assessed Penalty (adjusted for lim	its) \$3,060

	E	conomic	Benefit	Woı	rksheet		
Respondent	INEOS USA LL	C (PCW No. 1 of 4	1)				
Case ID No.		•	,				
Reg. Ent. Reference No.							
Media							Years of
						Percent Interest	Depreciation
Violation No.	12						
						5.0	15
	Item Cost	Date Required	Final Date	Yrs	Interest Saved	Costs Saved	EB Amount
Item Description							
,							
Delayed Costs							
Equipment				0.00	\$0	\$0	\$0
Buildings				0.00	\$0	\$0	\$0
Other (as needed)				0.00	\$0	\$0	\$0
Engineering/Construction				0.00	\$0	\$0	\$0
Land				0.00	\$0	n/a	\$0
Record Keeping System	\$1,500	15-Nov-2016	15-Apr-2017	0.41	\$31	n/a	\$31
Training/Sampling				0.00	\$0	n/a	\$0
Remediation/Disposal				0.00	\$0	n/a	\$0
Permit Costs				0.00	\$0	n/a	\$0
Other (as needed)				0.00	\$0	n/a	\$0
Notes for DELAYED costs	MN1601, PP4	4 TN1601, DM-90 dat	4N, AN-101, AN te and the Final	l-111, a Date is	and AN-402. The Is the date of compl		investigation
Avoided Costs	ANNUA	ALIZE avoided co	osts before en	tering	item (except for	one-time avoided	d costs)
Disposal				0.00	\$0	\$0	\$0
Personnel				0.00	\$0	\$0	\$0
Inspection/Reporting/Sampling				0.00	\$0	\$0	\$0
Supplies/Equipment				0.00	\$0	\$0	\$0
Financial Assurance				0.00	\$0	\$0	\$0
ONE-TIME avoided costs				0.00	\$0	\$0	\$0
Other (as needed)				0.00	\$0	\$0	\$0
Notes for AVOIDED costs							
Approx. Cost of Compliance		\$1,500			TOTAL		\$31

Respondent Case ID No. Reg. Ent. Reference No. Media			Docket No.	2021-0818-AIR-E	PCW
Reg. Ent. Reference No.	INEOS USA LLO	C (PCW No. 1 of 4)			Policy Revision 4 (April 2014)
_	. 60882				PCW Revision March 26, 2014
Media					
Enf. Coordinator		1			
Violation Number					
Rule Cite(s)	30 Tex Admin	Code §§ 122 121 a	nd 122 210(a) an	d Tex. Health & Safety Co	de 88
	JO TOX. Admin		054 and 382.085(_	ac 33
				ting emission units at the	
Violation Description				y 29, 2005, the Responder to add Engines OLE2COM	
Violation Description				were replaced in April 2013	
				rior to obtaining authorizat	
			, , , , , , , , , , , , , , , , , , ,	· · · · · · · · · · · · · · · · · · ·	
				Base Pe	nalty \$25,000
>> Environmental Prope	rty and Hun	an Haalth Matr	else.		
>> Environmental, Prope	ity and num	Harm	IX		
Release	e Major	Moderate Mir	nor		
OR Actua	I				
Potentia	I			Percent 0.0%	
>>Programmatic Matrix					
Falsification	Major	Moderate Mir	nor		
	Х			Percent 15.0%	
Matrix	100	20/ -£ th			
Notes	100	0% of the rule requir	ements were not	met.	
			Ac	djustment \$2	1,250
			710	Justinion	1,200
					\$3,750
Violation Events					
Number of	Violation Events	17	1/00	Number of violation days	
Number of	Violation Events	17	1498	Number of violation days	
Number of		17	1498	Number of violation days	
Number of	Violation Events daily weekly	17	1498	Number of violation days	
Number of	daily	17	1498	Number of violation days	
Number of	daily weekly	17	1498	Number of violation days Violation Base Pe	
Number of	daily weekly monthly		1498	-	
Number of	daily weekly monthly quarterly semiannual annual		1498	-	
Number of	daily weekly monthly quarterly semiannual		1498	-	
Number of	daily weekly monthly quarterly semiannual annual		1498	-	
	daily weekly monthly quarterly semiannual annual single event	X		-	nalty \$63,750
	daily weekly monthly quarterly semiannual annual single event	X	om the April 1, 20	Violation Base Pe	nalty \$63,750
	daily weekly monthly quarterly semiannual annual single event	x are recommended from	om the April 1, 20	Violation Base Pe	nalty \$63,750
	daily weekly monthly quarterly semiannual annual single event uarterly events a May 8, 20	x are recommended from	om the April 1, 20	Violation Base Pe	nalty \$63,750
Seventeen q	daily weekly monthly quarterly semiannual annual single event uarterly events a May 8, 20	x x are recommended from 17 screening date for 10.0%	om the April 1, 20	Violation Base Pe 013 non-compliance date to 0. 1358543.	nalty \$63,750
Seventeen q	daily weekly monthly quarterly semiannual annual single event uarterly events a May 8, 20	x x are recommended from 17 screening date for 10.0%	om the April 1, 20 or Investigation No	Violation Base Pe 013 non-compliance date to 0. 1358543.	\$63,750 so the
Seventeen q	daily weekly monthly quarterly semiannual annual single event uarterly events a May 8, 20	x x are recommended from 17 screening date for 10.0%	om the April 1, 20 or Investigation No	Violation Base Pe 013 non-compliance date to 0. 1358543.	\$63,750 so the
Seventeen q	daily weekly monthly quarterly semiannual annual single event uarterly events a May 8, 20	x x are recommended from 17 screening date for 10.0%	om the April 1, 20 or Investigation No	Violation Base Pe 013 non-compliance date to 0. 1358543.	\$63,750 so the
Seventeen q	daily weekly monthly quarterly semiannual annual single event uarterly events a May 8, 20 hply Extraordinary Ordinary	x are recommended fro 17 screening date for 10.0% Sefore NOE/NOV NOE/N	om the April 1, 20 or Investigation No DV to EDPRP/Settlem	Violation Base Pe	\$63,750 so the
Seventeen q	daily weekly monthly quarterly semiannual annual single event uarterly events a May 8, 20 hply Extraordinary Ordinary	x are recommended fro 17 screening date for 10.0% Before NOE/NOV NOE/N The Respondent co	om the April 1, 20 or Investigation No OV to EDPRP/Settlem X Completed the corr	Violation Base Pe 013 non-compliance date to 0. 1358543.	\$63,750 so the
Seventeen q	daily weekly monthly quarterly semiannual annual single event uarterly events a May 8, 20 nply Extraordinary Ordinary N/A	x are recommended fro 17 screening date for 10.0% Before NOE/NOV NOE/N The Respondent co	om the April 1, 20 or Investigation No OV to EDPRP/Settlem X Completed the corr	Violation Base Pe	\$63,750 so the
Seventeen q	daily weekly monthly quarterly semiannual annual single event uarterly events a May 8, 20 nply Extraordinary Ordinary N/A	x are recommended fro 17 screening date for 10.0% Before NOE/NOV NOE/N The Respondent co	om the April 1, 20 or Investigation No OV to EDPRP/Settlem X Completed the corr	Violation Base Pe	\$63,750 \$63,750 the section \$6,375
Seventeen q	daily weekly monthly quarterly semiannual annual single event uarterly events a May 8, 20 nply Extraordinary Ordinary N/A	x are recommended fro 17 screening date for 10.0% Before NOE/NOV NOE/N The Respondent co	om the April 1, 20 or Investigation No OV to EDPRP/Settlem X Completed the corr	Violation Base Pe	\$63,750 \$63,750 the section \$6,375
Seventeen q	daily weekly monthly quarterly semiannual annual single events May 8, 20 hply Extraordinary Ordinary N/A Notes	x are recommended fro 17 screening date for 10.0% before NOE/NOV NOE/N The Respondent co October 27, 2017	om the April 1, 20 or Investigation No OV to EDPRP/Settlem X Completed the corr	Violation Base Pe	\$63,750 the stotal \$57,375
Good Faith Efforts to Com Economic Benefit (EB) for	daily weekly monthly quarterly semiannual annual single event quarterly events a May 8, 20 hply Extraordinary Ordinary N/A Notes	x are recommended fro 17 screening date for 10.0% Before NOE/NOV NOE/N The Respondent coroctober 27, 2017	om the April 1, 20 or Investigation No OV to EDPRP/Settlem X completed the corr after the NOE da	Violation Base Pe	\$63,750 The \$63,750 Othe \$6,375 Othorized \$57,375
Good Faith Efforts to Com Economic Benefit (EB) for	daily weekly monthly quarterly semiannual annual single events May 8, 20 hply Extraordinary Ordinary N/A Notes	x are recommended fro 17 screening date for 10.0% Before NOE/NOV NOE/N The Respondent coroctober 27, 2017	om the April 1, 20 or Investigation No OV to EDPRP/Settlem X Completed the corr	Violation Base Pe	\$63,750 The \$63,750 Othe \$6,375 Othorized \$57,375
Good Faith Efforts to Com Economic Benefit (EB) for	daily weekly monthly quarterly semiannual annual single event quarterly events a May 8, 20 hply Extraordinary Ordinary N/A Notes	x are recommended fro 17 screening date for 10.0% Before NOE/NOV NOE/N The Respondent co October 27, 2017	om the April 1, 20 or Investigation Not to EDPRP/Settlem X Dempleted the corruption of the NOE date of the N	Violation Base Pe	\$63,750 \$63,750 \$63,750 \$6,375 \$6,375 \$5t \$107,100

Economic Benefit Worksheet								
Respondent	INEOS USA LL	.C (PCW No. 1 of 4	·)					
Case ID No.								
Reg. Ent. Reference No.	RN100238708	}						
Media Violation No.	Air					Percent Interest	Years of Depreciation	
Violation No.	13							
						5.0	15	
	Item Cost	Date Required	Final Date	Yrs	Interest Saved	Costs Saved	EB Amount	
Item Description								
Delayed Costs				<u>_</u>				
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)				0.00	\$0	n/a	\$0	
Notes for DELAYED costs					lation No. 2 in PCV			
Avoided Costs	ANNU	ALIZE avoided co	osts before er	tering	item (except for	one-time avoide	d costs)	
Disposal				0.00	\$0	\$0	\$0	
Personnel				0.00	\$0	\$0	\$0	
Inspection/Reporting/Sampling				0.00	\$0	\$0	\$0	
Supplies/Equipment				0.00	\$0	\$0	\$0	
Financial Assurance				0.00	\$0	\$0	\$0	
ONE-TIME avoided costs				0.00	\$0	\$0	\$0	
Other (as needed)				0.00	\$0	\$0	\$0	
Notes for AVOIDED costs								
Approx. Cost of Compliance		\$0			TOTAL		\$0	

	E	conomic	Benefit	Woı	rksheet		
		C (PCW No. 1 of 4	1)				
Case ID No.							
Reg. Ent. Reference No.							V
Media Violation No.						Percent Interest	Years of Depreciation
Violation No.	14					1	
			F: 15 :	.,		5.0	15
	Item Cost	Date Required	Final Date	Yrs	Interest Saved	Costs Saved	EB Amount
I tem Description							
Delayed Costs							
Equipment				0.00	\$0	\$0	\$0
Buildings				0.00	\$0	\$0	\$0
Other (as needed)				0.00	\$0	\$0	\$0
Engineering/Construction				0.00	\$0	\$0	\$0
Land				0.00	\$0	n/a	\$0
Record Keeping System				0.00	\$0	n/a	\$0
Training/Sampling				0.00	\$0	n/a	\$0
Remediation/Disposal Permit Costs				0.00	\$0 \$0	n/a n/a	\$0 \$0
Other (as needed)	\$1,750	31-Jul-2013	1-Jan-2025	11.43	\$1,000	n/a	\$1,000
Notes for DELAYED costs	through July 1 2014, July 1 through Decer AG-203B an	ne 30, 2013, July , 2014 through D mber 31, 2015, Ja d Level Control Pu compliance	1, 2013 throug ecember 31, 20 inuary 1, 2016 imp AG-2705D and the Final D	h Decer 014, Jar through (\$250/r ate is th	mber 31, 2013, January 1, 2015 through June 30, 2016 report). The Date the estimated date	<u> </u>	gh June 30, July 1, 2015 Frewater Pump date of non-
Avoided Costs	ANNUA	ALIZE avoided co	osts before en			one-time avoided	
Disposal				0.00	\$0	\$0	\$0
Personnel				0.00	\$0 \$0	\$0 \$0	\$0 \$0
Inspection/Reporting/Sampling Supplies/Equipment				0.00	\$0 \$0	\$0 \$0	\$0 \$0
Financial Assurance				0.00	\$0 \$0	\$0 \$0	\$0
ONE-TIME avoided costs				0.00	\$0	\$0	\$0
Other (as needed)				0.00	\$0	\$0	\$0
Notes for AVOIDED costs							
Approx. Cost of Compliance		\$1,750			TOTAL		\$1,000

			23-Sep-2016			ket No . 2021-0818	AIR-E	PCW
	-		INEOS USA LLO	C (PCW No. 1 o	of 4)		Policy	Revision 4 (April 2014)
		ID No.					PCW F	Revision March 26, 2014
Reg.	Ent. Referer							
	E . C . O	Media						
			Danielle Porras	} 1				
	Violation		15					ī
	Ruie	e Cite(s)				15(c), and 122.143(4),		
			95 and PSDT)			P No. O2327, GTC and Code § 382.085(b)	STC No. 20, and	
	Violation Des	scription	detector. calibration of t Z14 on 13 oc that occurred calibration of t	Specifically, the LEL detector casions during from October he LEL detector	ne Respondent ors for Unit Nos maintenance, 1, 2015 to Sep or for the No. 1	ion of the lower explosion of the lower explosion of the result of the r	ecords for the 5, M8, M9, T5, and ("MSS") activities did not record the ities that occurred	
							Base Penalty	\$25,000
>> Env	vironmental,	, Proper	ty and Hun		Matrix			
		Release	Maias	Harm Moderate	Minor			
OR		Release Actual	Major	Moderate	Minor			
OK		Potential				Percent	0.0%	
						. 5. 5011	3.3.3	
>>Prog	grammatic N	Matrix						
	Fals	sification	Major	Moderate	Minor			
					Х	Percent	1.0%	
								ī
	Matrix Notes		Less th	an 30% of the	rule requirem	ents were not met.		
						Adjustment	\$24,750	
						Adjustment	\$24,750	***
						Adjustment	\$24,750	\$250
Violatio	on Events					Adjustment	\$24,750	\$250
Violatio	on Events					Adjustment	\$24,750	\$250
Violatio		umber of V	/iolation Events	10			\$24,750	\$250
Violatio		umber of V		10	Ē			\$250
Violatio		umber of \	daily	10				\$250
Violatio		umber of V		10				\$250
Violatio		umber of V	daily weekly monthly	10		365 Number of v	violation days	
Violatio		umber of \	daily weekly monthly quarterly	10		365 Number of v		\$250 \$2,500
Violatio		umber of \	daily weekly monthly quarterly semiannual	10		365 Number of v	violation days	
Violatio		umber of \	daily weekly monthly quarterly	10		365 Number of v	violation days	
Violatio		umber of V	daily weekly monthly quarterly semiannual annual			365 Number of v	violation days	
Violatio	Nu		daily weekly monthly quarterly semiannual annual single event	X	event for each	365 Number of v	violation days ion Base Penalty	
	Nu	en single e	daily weekly monthly quarterly semiannual annual single event	x x		365 Number of v	violation days ion Base Penalty records for each	\$2,500
	Nu	en single e	daily weekly monthly quarterly semiannual annual single event	x x x 25.0%	unit).	Number of v Violati	violation days ion Base Penalty	
	Nu	en single e	daily weekly monthly quarterly semiannual annual single event	x x x x x x x x x x x x x x x x x x x	unit).	365 Number of v	violation days ion Base Penalty records for each	\$2,500
	Nu	en single e	daily weekly monthly quarterly semiannual annual single event vents are recor	x x x x x x x x x x x x x x x x x x x	unit).	Number of v Violati	violation days ion Base Penalty records for each	\$2,500
	Nu	en single e	daily weekly monthly quarterly semiannual annual single event vents are recor	x x x x x x x x x x x x x x x x x x x	unit).	Number of v Violati	violation days ion Base Penalty records for each	\$2,500
	Nu	en single e	daily weekly monthly quarterly semiannual annual single event vents are recor	x x x x x x x x x x x x x x x x x x x	unit). NOE/NOV to EDF dent completed 30, 2016, prio	Number of v Violati	records for each Reduction	\$2,500
	Nu	en single e	daily weekly monthly quarterly semiannual annual single event vents are recor ply Extraordinary Ordinary N/A	x x x x x x x x x x x x x x x x x x x	unit). NOE/NOV to EDF dent completed 30, 2016, prio	Violation of the missing set of the missing set of the missing set of the missing set of the corrective measurer to the NOE dated April 17.	records for each Reduction	\$2,500
Good F	Nu	en single e to Com	daily weekly monthly quarterly semiannual annual single event vents are recor ply Extraordinary Ordinary N/A Notes	x x 25.0% Sefore NOE/NOV x X September	unit). NOE/NOV to EDF dent completed 30, 2016, prio	Violation of the missing set of the RP/Settlement Offer the the corrective measurer to the NOE dated April 17.	records for each Reduction res by il 28,	\$2,500 \$625
Good F	Te	en single e to Com	daily weekly monthly quarterly semiannual annual single event vents are recor ply Extraordinary Ordinary N/A Notes	x mmended (one 25.0% Before NOE/NOV X The Respond September	unit). NOE/NOV to EDF dent completed 30, 2016, prio	Violation of the missing set of the corrective measures to the NOE dated Apropriate. V Statutory	records for each Reduction res by iil 28,	\$2,500 \$625
Good F	Te	en single e to Com	daily weekly monthly quarterly semiannual annual single event vents are recor ply Extraordinary Ordinary N/A Notes	x x x x x x x x x x x x x x x x x x x	unit). NOE/NOV to EDP dent complete 30, 2016, prio 20	Violation of the missing set of the corrective measures to the NOE dated Apropriate. V Statutory	records for each Reduction Res by il 28, iolation Subtotal y Limit Test	\$2,500 \$625 \$1,875

	E	conomic	Benefit	Wo	rksheet		
Respondent	INEOS USA LL	.C (PCW No. 1 of	4)				
Case ID No.							
Reg. Ent. Reference No.							
Media							Years of
Violation No.						Percent Interest	Depreciation
Violation No.	13					= 0	
						5.0	
	Item Cost	Date Required	Final Date	Yrs	Interest Saved	Costs Saved	EB Amount
Item Description							
Delayed Costs							
Equipment				0.00	\$0	\$0	\$0
Buildings				0.00	\$0	\$0	\$0
Other (as needed)				0.00	\$0	\$0	\$0
Engineering/Construction				0.00	\$0	\$0	\$0
Land				0.00	\$0	n/a	\$0
Record Keeping System	\$1,500	1-Oct-2015	30-Sep-2016	1.00	\$75	n/a	\$75
Training/Sampling				0.00	\$0	n/a	\$0
Remediation/Disposal				0.00	\$0	n/a	\$0
Permit Costs				0.00	\$0	n/a	\$0
Other (as needed)				0.00	\$0	n/a	\$0
Notes for DELAYED costs		aintaining the rec	ords for the cali	bration	0 3	n for the MSS monit ors. The Date Requi e of compliance.	0. 0
Avoided Costs	ANNU/	ALIZE avoided c	osts before en	tering	item (except for	r one-time avoide	d costs)
Disposal				0.00	\$0	\$0	\$0
Personnel				0.00	\$0	\$0	\$0
Inspection/Reporting/Sampling				0.00	\$0	\$0	\$0
Supplies/Equipment				0.00	\$0	\$0	\$0
Financial Assurance				0.00	\$0	\$0	\$0
ONE-TIME avoided costs				0.00	\$0	\$0	\$0
Other (as needed)				0.00	\$0	\$0	\$0
Notes for AVOIDED costs							
Approx. Cost of Compliance		\$1,500			TOTAL		\$75

	Scre	ening Date	23-Sep-2016		Docket No	2021-0818-AIR-E		PCW
			INEOS USA LLC (PC)	W No. 1 of 4)				Revision 4 (April 2014)
Pog		ase ID No.					PCW Re	vision March 26, 2014
Reg.	Ent. Rei	erence No. Media	RN100238708					
	Fnf C		Danielle Porras					
		tion Number						
		Rule Cite(s)	30 Tex. Admin. Coo	de §§ 101.20(3),	116.115(c), aı	nd 122.143(4), NSR Per	mit Nos.	
					(2), FOP No. O	2327, GTC and STC No.		
	Violatio	n Description	the Respondent di detectors Unit Nos M8, M9, and T5 on 3 2015 to Septembe LEL detector foi	id not maintain th s. A9, D10, D12, I 33 occasions durir r 30, 2016 and d r the No. 1 Olefin	ne records for t D20, H12, H18 ng MSS activiti id not record t s Unit MSS act	of the LEL detector. Sp the functionality test of the part of the functionality test of the est hat occurred from One the functionality test data invities that occurred on the functionality test data invities that occurred on the functionality test data	the LEL M3, M7, October 1, a of the	
						Base	Penalty	\$25,000
>> Env	/ironme	ntal, Propei	rty and Human I	Health Matrix	(
		_	H	larm				
OR		Release Actual	Major Mo	derate Mino	r			
OK		Potential				Percent 0.0%		
>>Pro	gramma	tic Matrix						
		Falsification	Major Mo	derate Mino	r			
				X		Percent 1.0%		
	Matrix Notes		Less than 30	% of the rule req	uirements wer	re not met.		
					А	djustment	\$24,750	
								\$250
Violatio	on Event	is						
		Number of \	/iolation Events	17	365	Number of violation d	lays	
								
			daily					
			weekly monthly					
			quarterly			Violation Base	Penalty	\$4,250
			semiannual				_	
			annual					
			single event	Х				
		Seventeen s	ingle events are reco	mmended (one e each un		of the missing set of rec	ords for	
Cost	aith Fer	mts ts 0-	-1.	25 00/				¢1.0/0
G000 F	aiin Eiic	orts to Com		25.0% NOE/NOV	to EDPRP/Settler		Reduction	\$1,062
			Extraordinary					
			Ordinary	х				
			N/A					
				•	•	NOE dated April 28,		
						Violation	Subtotal	\$3,188
Econor	nic Bene	efit (EB) for	this violation			Statutory Limit	Test	
					¢7E		_	¢/ 500
		Estimate	ed EB Amount	:	\$75	Violation Final Pena	ity rotai	\$6,503
				This violation Fi	inal Assessed	l Penalty (adjusted fo	r limits)	\$6,503

	E	conomic	Benefit	Woi	rksheet		
		C (PCW No. 1 of	4)				
Case ID No.							
Reg. Ent. Reference No.	RN100238708	3					
Media Violation No.						Percent Interest	Years of Depreciation
						5.0	15
	Item Cost	Date Required	Final Date	Yrs	Interest Saved	Costs Saved	EB Amount
Item Description		•					
Delayed Costs							
Equipment				0.00	\$0	\$0	\$0
Buildings				0.00	\$0	\$0	\$0
Other (as needed)				0.00	\$0	\$0	\$0
Engineering/Construction				0.00	\$0	\$0	\$0
Land				0.00	\$0	n/a	\$0
Record Keeping System				0.00	\$0	n/a	\$0
Training/Sampling	\$1,500	1-Oct-2015	30-Sep-2016	1.00	\$75	n/a	\$75
Remediation/Disposal				0.00	\$0	n/a	\$0
Permit Costs				0.00	\$0	n/a	\$0
Other (as needed)				0.00	\$0	n/a	\$0
Notes for DELAYED costs	Require	ed is the first date	of non-complia	nce dat	e and the Final Da	t for the LEL detect te is the date of cor	npliance.
Avoided Costs	ANNU	ALIZE avoided c	osts before er		•	one-time avoide	
Disposal				0.00	\$0	\$0	\$0
Personnel				0.00	\$0	\$0	\$0
Inspection/Reporting/Sampling				0.00	\$0	\$0	\$0
Supplies/Equipment				0.00	\$0	\$0	\$0
Financial Assurance				0.00	\$0	\$0	\$0
ONE-TIME avoided costs				0.00	\$0	\$0	\$0
Other (as needed)				0.00	\$0	\$0	\$0
Notes for AVOIDED costs							
Approx. Cost of Compliance		\$1,500			TOTAL		\$75

		ening Date		Docket No. 2021-0818-AIR-E	PCW
				(PCW No. 1 of 4)	Policy Revision 4 (April 2014)
Rea.		case ID No.	RN100238708		PCW Revision March 26, 2014
		Media			
			Danielle Porras	1	
	Viola	ation Number Rule Cite(s)		nin. Code §§ 101.20(3), 116.115(b)(2)(E)(i), and 122.143(4), NS	2D
		Kulo Ollo(3)		5 and PSDTX854M2, General Conditions No. 7, FOP No. 02327, (
			and	STC No. 20, and Tex. Health & Safety Code § 382.085(b)	
				naintain records containing the information and data sufficient to	
	Violatio	n Description		e compliance with the permit. Specifically, the Respondent did no ecords for the LEL readings during the MSS activities that occurre	
		2 000 p		2015 and April 4, 2016 to demonstrate compliance with SC No. 6	
				of NSR Permit Nos. 95 and PSDTX854M2.	
				Base Per	nalty \$25,000
					arty \$23,000
>> En	vironme	ntal, Prope	rty and Hum	an Health Matrix Harm	
		Release		Moderate Minor	
OR		Actual Potential		Percent 0.0%	
		roteittai		Percent 0.0%	
>>Pro	gramma	tic Matrix	Major	Madarata Minar	
		Falsification	Major	Moderate Minor x Percent 1.0%	
			1	<u>11</u>	
	Matrix			200/ -646	
	Notes		Less tha	an 30% of the rule requirements were not met.	
				Adjustment \$24	,750
					\$250
Violati	on Even	ts			\$250
Violati	on Even		Violation Events	Number of violation days	\$250
Violati	on Even		Violation Events	1 2 Number of violation days	\$250
Violati	on Even		daily	1 2 Number of violation days	\$250
Violati	on Even		daily weekly	1 2 Number of violation days	\$250
Violati	on Even		daily	1 2 Number of violation days Violation Base Per	
Violati	on Even		daily weekly monthly quarterly semiannual		
Violati	on Even		daily weekly monthly quarterly semiannual annual		
Violati	on Even		daily weekly monthly quarterly semiannual		
Violati	on Even		daily weekly monthly quarterly semiannual annual	Violation Base Per	
Violati	on Even		daily weekly monthly quarterly semiannual annual		
		Number of N	daily weekly monthly quarterly semiannual annual single event	Violation Base Per x One single event is recommended.	nalty \$250
			daily weekly monthly quarterly semiannual annual single event	Violation Base Per	nalty \$250
		Number of N	daily weekly monthly quarterly semiannual annual single event	Violation Base Per X One single event is recommended. 25.0% efore NOE/NOV NOE/NOV to EDPRP/Settlement Offer	nalty \$250
		Number of N	daily weekly monthly quarterly semiannual annual single event ply Extraordinary Ordinary	Violation Base Per X One single event is recommended. Reduce	nalty \$250
		Number of N	daily weekly monthly quarterly semiannual annual single event	Violation Base Per X One single event is recommended. 25.0% efore NOE/NOV NOE/NOV to EDPRP/Settlement Offer	nalty \$250
		Number of N	daily weekly monthly quarterly semiannual annual single event ply Extraordinary Ordinary	One single event is recommended. 25.0% Reduce the fore NOE/NOV NOE/NOV to EDPRP/Settlement Offer X The Respondent completed the corrective measures by September 30, 2016, prior to the NOE dated April 28,	nalty \$250
		Number of N	daily weekly monthly quarterly semiannual annual single event Extraordinary Ordinary N/A	Violation Base Per X One single event is recommended. 25.0% Frequency Reduced to the content of the content	nalty \$250
		Number of N	daily weekly monthly quarterly semiannual annual single event Extraordinary Ordinary N/A	One single event is recommended. 25.0% Reduce the fore NOE/NOV NOE/NOV to EDPRP/Settlement Offer X The Respondent completed the corrective measures by September 30, 2016, prior to the NOE dated April 28,	nalty \$250
Good F	aith Eff	Number of N	daily weekly monthly quarterly semiannual annual single event Extraordinary Ordinary N/A	One single event is recommended. 25.0% Reduce For NOE/NOV NOE/NOV to EDPRP/Settlement Offer X The Respondent completed the corrective measures by September 30, 2016, prior to the NOE dated April 28, 2017. Violation Subt	total \$188
Good F	aith Eff	Number of Number	daily weekly monthly quarterly semiannual annual single event apply Extraordinary Ordinary N/A Notes	One single event is recommended. 25.0% Efore NOE/NOV NOE/NOV to EDPRP/Settlement Offer X The Respondent completed the corrective measures by September 30, 2016, prior to the NOE dated April 28, 2017. Violation Subt	stotal \$188
Good F	aith Eff	Number of Number	daily weekly monthly quarterly semiannual annual single event Extraordinary Ordinary N/A Notes	One single event is recommended. 25.0% Reduce For NOE/NOV NOE/NOV to EDPRP/Settlement Offer X The Respondent completed the corrective measures by September 30, 2016, prior to the NOE dated April 28, 2017. Violation Subt	total \$188

	E	conomic	Benefit	Woı	rksheet		
Respondent	INEOS USA LL	C (PCW No. 1 of 4	1)				
Case ID No.	60882						
Reg. Ent. Reference No.	RN100238708	3					
Media Violation No.						Percent Interest	Years of Depreciation
						5.0	15
	Item Cost	Date Required	Final Date	Yrs	Interest Saved	Costs Saved	EB Amount
Item Description							
Delayed Costs							
Equipment				0.00	\$0	\$0	\$0
Buildings				0.00	\$0	\$0	\$0
Other (as needed)				0.00	\$0	\$0	\$0
Engineering/Construction				0.00	\$0	\$0	\$0
Land				0.00	\$0	n/a	\$0
Record Keeping System	\$1,500	5-Nov-2015	30-Sep-2016	0.90	\$68	n/a	\$68
Training/Sampling				0.00	\$0	n/a	\$0
Remediation/Disposal				0.00	\$0	n/a	\$0
Permit Costs				0.00	\$0	n/a	\$0
Other (as needed)				0.00	\$0	n/a	\$0
Notes for DELAYED costs	readings	during MSS activ	ities in order to	demon	strate compliance of non-compliance	ion and data sufficie with NSR Permit No and the Final Date i	s. 95 and
Avoided Costs	ANNU	ALIZE avoided c	osts before er	tering	item (except for	one-time avoided	d costs)
Disposal				0.00	\$0	\$0	\$0
Personnel				0.00	\$0	\$0	\$0
Inspection/Reporting/Sampling				0.00	\$0	\$0	\$0
Supplies/Equipment				0.00	\$0	\$0	\$0
Financial Assurance				0.00	\$0	\$0	\$0
ONE-TIME avoided costs				0.00	\$0	\$0	\$0
Other (as needed)				0.00	\$0	\$0	\$0
Notes for AVOIDED costs							
Approx. Cost of Compliance		\$1,500			TOTAL		\$68

	Scre	ening Date	23-Sep-2016	Docket No. 2021-0818-AIR-E	PCW
		-		C (PCW No. 1 of 4)	Policy Revision 4 (April 2014)
Dog		Case ID No.	60882 RN100238708		PCW Revision March 26, 2014
Reg.	EIII. Rei	Media			
	Enf. C	Coordinator	Danielle Porras		
	Viola	ation Number			
		Rule Cite(s)		. Code §§ 101.20(2), 113.120, 113.890, and 122.143(4), 40 CFF	
			63.138(D)(1)(i) and 63.2450(a), FOP No. O2327, GTC and STC No. 1.A., and T Health & Safety Code § 382.085(b) 	ex.
			Failed to comp	y with the concentration limit. Specifically, the Respondent excer	adad
				itlet concentration limit of 50 parts per million by weight ("ppmw"	
	Violatio	n Description	3	2.8 ppmw to 410.0 ppmw for a total of 16 hours on three days fr , 2016 to March 31, 2016 for the Second Stage Hydrotreater Unit	
	violatio	ii bescription		ess PRO-SSMON and by a range from 17.1 ppmw to 87.0 ppmw	
			total of two h	ours on April 1, 2016 for the Olefins 2 Aromatic Waste Minimizati	on en
				Project Treatment Process PRO-AWMP2.	
				Base Pen	alty \$25,000
s s Em	dranma	ntal Drana	rty and Llum	on Health Matrix	
>> ENV	vironme	ntai, Prope	rty and Hun	nan Health Matrix Harm	
0.0		Release	Major	Moderate Minor	
OR		Actual Potential		X Percent 15.0%	
				1.0.000	
>>Prog	gramma	tic Matrix Falsification	Major	Moderate Minor	
		Taisincation	Wajor	Percent 0.0%	
	Matrix			nent has been exposed to insignificant amounts of pollutants that	
	Notes	not exceed lev	veis triat are pro	tective of human health or environmental receptors as a result or violation.	trie
				Adjustment \$21	,250
					\$3,750
Violatio	on Even	ts			
		Number of N	Violation Events	1 4 Number of violation days	
		Number of	violation Events	1 4 Number of violation days	
			daily		
			weekly monthly		
			quarterly	X Violation Base Pen	alty \$3,750
			semiannual		
			annual single event		
			3		
		One quarte	erly event is reco	ommended for the instances of non-compliance that occurred from	n
				February 4, 2016 to April 1, 2016.	
Good E	aith Eff	orts to Com	nlv	25.0% Reduc	stion \$937
COOU F	and Ell	orts to com	E	efore NOE/NOV NOE/NOV to EDPRP/Settlement Offer	ψ,37
			Extraordinary		
			Ordinary N/A	X	
			IV/A	The Despendent completed the corrective management on	
			Notes	The Respondent completed the corrective measures on April 1, 2016, prior to the NOE dated April 28, 2017.	
				Violation Subt	otal \$2,813
Econon	nic Bene	efit (EB) for	this violati	on Statutory Limit Tes	t
		Estimate	ed EB Amount	\$78 Violation Final Penalty T	otal \$5,738
				This violation Final Assessed Penalty (adjusted for lin	nits) \$5,738

	E	conomic	Benefit	wor	rksheet		
Respondent	INEOS USA LL	C (PCW No. 1 of 4	1)				
Case ID No.							
Reg. Ent. Reference No.							
Media						Percent Interest	Years of
Violation No.	18						Depreciation
						5.0	15
	I tem Cost	Date Required	Final Date	Yrs	Interest Saved	Costs Saved	EB Amount
Item Description							
Delayed Costs							
Equipment				0.00	\$0	\$0	\$0
Buildings				0.00	\$0	\$0	\$0
Other (as needed)				0.00	\$0 \$0	\$0	\$0 \$0
Engineering/Construction Land				0.00	\$0 \$0	\$0 n/a	\$0 \$0
Record Keeping System				0.00	\$0 \$0	n/a	\$0 \$0
Training/Sampling				0.00	\$0 \$0	n/a	\$0 \$0
Remediation/Disposal				0.00	\$0	n/a	\$0
Permit Costs				0.00	\$0	n/a	\$0
Other (as needed)	\$10,000	4-Feb-2016	1-Apr-2016	0.16	\$78	n/a	\$78
Notes for DELAYED costs	limit for the Se	econd Stage Hydr ion Project Treatr	otreater Unit Tr ment Process Pf	eatmen RO-AWN	t Process PRO-SSI	the benzene outlet MON and Olefins 2 A quired is the first da mpliance.	Aromatic Waste
Avoided Costs	ANNUA	LIZE avoided co	osts before en	tering	item (except for	one-time avoide	d costs)
Disposal				0.00	\$0	\$0	\$0
Personnel				0.00	\$0	\$0	\$0
Inspection/Reporting/Sampling				0.00	\$0	\$0	\$0
Supplies/Equipment				0.00	\$0	\$0	\$0
Financial Assurance				0.00	\$0 \$0	\$0 \$0	\$0 \$0
ONE-TIME avoided costs Other (as needed)				0.00	\$0 \$0	\$0 \$0	\$0 \$0
Notes for AVOIDED costs		<u> </u>		0.00	ΨΟ	Ψ0	Ψ0
Approx. Cost of Compliance		\$10,000			TOTAL		\$78

Screening Date		Docket No. 2021-0818-AI	R-E	PCW
	INEOS USA LLC (PCW No. 1 of 4)		ion 4 (April 2014)
Case ID No Reg. Ent. Reference No			PCW Revisio	n March 26, 2014
Media				
Enf. Coordinator				
Violation Numbe Rule Cite(s)				
Rule Cite(s)	30 Tex. Admin. C	Code §§ 101.20(3), 116.115(b)(2)(F) and (c), and 1		
	Permit Nos. 95 a	and PSDTX854M2, SC No. 1, FOP No. O2327, GTC a and Tex. Health & Safety Code § 382.085(b)	ind STC No. 20,	
	Failed to comp	ly with the MAER. Specifically, the Respondent exc	eeded the CO	
Violation Description		s/hr by a range from 0.01 lb/hr to 0.33 lb/hr for a to		
	from Novemb	er 9, 2015 through November 20, 2015 for the Ste DDB-101B, resulting in 4.27 lbs of unauthorized CO	9	
			Paca Donalty	\$25,000
			Base Penalty	\$25,000
>> Environmental, Prope	erty and Huma			
Release	e Major	Harm Moderate Minor		
OR Actua		Х		
Potentia		Percent 15	5.0%	
>>Programmatic Matrix				
Falsification	Major	Moderate Minor		
		Percent (0.0%	
Human healt	h or the environme	ent has been exposed to insignificant amounts of po	Ilutants that did	
		ctive of human health or environmental receptors a		
Notes		violation.		
		Adjustment	\$21,250	
				¢2.750
				\$3,750
Violation Events				
Number of	Violation Events	1 11 Number of vio	lation days	
			,	
	daily weekly			
	monthly			
	quarterly	x Violation	n Base Penalty	\$3,750
	semiannual			
	annual single event			
One quart	-	nmended for the instances of non-compliance that o	occurred from	
	Nov	vember 9, 2015 to November 20, 2015.		
Good Faith Efforts to Con	only	25.0%	Reduction	\$937
Cood Faith Ellorts to Coll	Bef	ore NOE/NOV NOE/NOV to EDPRP/Settlement Offer	Neduction	Ψ737
	Extraordinary			
	Ordinary N/A	X		
		The Respondent completed the corrective measures	s on	
	Notes	November 20, 2015, prior to the NOE dated April 2		
		2017.		
		Viol	lation Subtotal	\$2,813
Foonomic Bonofit (FD) f-	r this vistatia			
Economic Benefit (EB) fo	i inis violatioi	n Statutory I	Limit rest	
Estima	ted EB Amount	\$15 Violation Fina	l Penalty Total	\$5,738
		This violation Final Assessed Penalty (adjus	sted for limits)	\$5,738

	E	conomic	Benefit	Woı	rksheet		
Respondent	INEOS USA LL	.C (PCW No. 1 of	4)				
Case ID No.	60882						
Rea. Ent. Reference No.							
Media							Years of
Violation No.						Percent Interest	Depreciation
						5.0	15
	Item Cost	Date Required	Final Date	Yrs	Interest Saved	Costs Saved	EB Amount
Item Description							
Delayed Costs							
Equipment				0.00	\$0	\$0	\$0
Buildings				0.00	\$0	\$0	\$0
Other (as needed)				0.00	\$0	\$0	\$0
Engineering/Construction				0.00	\$0	\$0	\$0
Land				0.00	\$0	n/a	\$0
Record Keeping System				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	9-Nov-2015	20-Nov-2015	0.03	\$15	n/a	\$15
Notes for DELAYED costs	Furnace, EPN	DDB-101B. The	Date Required dat	s the fi e of cor	rst date of non-compliance.	ourly MAER for the S mpliance and the Fir	nal Date is the
Avoided Costs	ANNUA	ALIZE avoided c	osts before en			one-time avoide	
Disposal				0.00	\$0	\$0	\$0
Personnel				0.00	\$0	\$0	\$0
Inspection/Reporting/Sampling				0.00	\$0	\$0	\$0
Supplies/Equipment				0.00	\$0	\$0	\$0
Financial Assurance				0.00	\$0	\$0	\$0
ONE-TIME avoided costs				0.00	\$0	\$0	\$0
Other (as needed)				0.00	\$0	\$0	\$0
Notes for AVOIDED costs							
Approx. Cost of Compliance		\$10,000			TOTAL		\$15

		ening Date		Docket No. 2021-0818-AIR-E		PCW
				(PCW No. 1 of 4)	Policy	Revision 4 (April 2014)
_		Case ID No.			PCW F	Revision March 26, 2014
Reg.	Ent. Rei	rerence No. Media	RN100238708			
	Fnf (Danielle Porras			
		ation Number				
		Rule Cite(s)		Code §§ 116.115(b)(2)(F) and (c) and 122.143(4), NS	R Permit No	
			00 10/11 / 10/11/11	1, FOP No. O2327, GTC and STC No. 20, and Tex. Hea Code § 382.085(b)		
	Violatio	n Description	MAER of 14.85 hours on three the CO MAER o of three hours	ly with the MAERs. Specifically, the Respondent exceeds lbs/hr by a range from 0.23 lb/hr to 7.97 lbs/hr for a days from February 24, 2016 to September 20, 2016 at 21.78 lbs/hr by a range from 7.89 lbs/hr to 67.52 lbs/on July 26, 2016 and July 28, 2016 for Furnace No. 10 in the unauthorized release of 9.34 lbs of NOx emission lbs of CO emissions.	total of four nd exceeded hr for a total 5, EPN DDB-	
				Е	Base Penalty	\$25,000
>> Env	/ironme	ntal, Prope	rty and Hum	an Health Matrix		
		Release	Major	Harm Moderate Minor		
OR		Actual		X		
		Potential		Percent 15.0	%	
D		atia Matuis				
>>Pro(gramma	tic Matrix Falsification	Major	Moderate Minor		
				Percent 0.0	%	
						r
	Matrix Notes			ent has been exposed to insignificant amounts of pollui ective of human health or environmental receptors as a violation.		
				Adjustment	\$21,250	
						#2.750
						\$3,750
Violatio	on Even	ts				
		Number of N	/iolation Events	2 5 Number of violati	on days	
		Number of	Aloiation Events	2 INdiffiber of violati	on days	
			daily			
			weekly			
			monthly quarterly	Violation F	Base Penalty	\$7,500
			semiannual	X	ase Fenancy	\$7,500
			annual			
			single event			
						[
		Two semiann		commended for the instances of non-compliance that o bruary 24, 2016 to September 20, 2016.	ccurred from	
0	=		, ,			
Good F	aith Eff	orts to Com		25.0% fore NOE/NOV NOE/NOV to EDPRP/Settlement Offer	Reduction	\$1,875
			Extraordinary			
			Ordinary	х		
			N/A		-	
			Notes	The Respondent completed the corrective measures of September 20, 2016, prior to the NOE dated April 28, 2017.		
				Violat	ion Subtotal	\$5,625
Econon	nic Ben	efit (EB) for	this violatio	n Statutory Lir	nit Test	
		Fetimat	ed EB Amount	\$286 Violation Final P	enalty Total	\$11,475
		_5,,,,,				
				This violation Final Assessed Penalty (adjuste	d for limits)	\$11,475

	E	conomic	Benefit	Wo	rksheet		
Respondent	INEOS USA LL	C (PCW No. 1 of	4)				
Case ID No.	60882						
Rea. Ent. Reference No.	RN100238708						
Media							Years of
Violation No.						Percent Interest	Depreciation
						5.0	15
	Item Cost	Date Required	Final Date	Yrs	Interest Saved	Costs Saved	EB Amount
Item Description		•					
rtem Bescription							
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	24-Feb-2016	20-Sep-2016	0.57	\$286	n/a	\$286
Notes for DELAYED costs	No. 105, EPI	N DDB-105. The	Date Required is dat	s the fir e of cor	est date of non-con mpliance.	and CO hourly MAE npliance and the Fin	al Date is the
Avoided Costs	ANNUA	ALIZE avoided c	osts before en	tering	item (except for	one-time avoide	d costs)
Disposal				0.00	\$0	\$0	\$0
Personnel				0.00	\$0	\$0	\$0
Inspection/Reporting/Sampling				0.00	\$0	\$0	\$0
Supplies/Equipment				0.00	\$0	\$0	\$0
Financial Assurance				0.00	\$0	\$0	\$0
ONE-TIME avoided costs				0.00	\$0	\$0	\$0
Other (as needed)				0.00	\$0	\$0	\$0
Notes for AVOIDED costs							
Approx. Cost of Compliance		\$10,000			TOTAL		\$286

		ening Date			Docket No.	2021-0818-AIR-E		PCW
			INEOS USA LLC ((PCW No. 1 of 4)			Policy	Revision 4 (April 2014)
		ase ID No.					PCW R	evision March 26, 2014
Reg.	Ent. Ref		RN100238708					
		Media						
			Danielle Porras					
	Viola	tion Number						
		Rule Cite(s)				.143(4), FOP No. O23	27, GTC	
			and S	IC No. 1.A., and Tex	. Health & Safet	y Code § 382.085(b)		
	Violatio	n Description	the ammonia cor 3.0 percent oxyg 0.02 ppmv to	ncentration limit of 1 gen ("% O2") based 7.94 ppmv for a tota	0 parts per million on a 24-hour avoil of 503 hours o	cally, the Respondent on by volume dry ("pp eraging period by a ra in 38 days from Nover king Furnace, EPN DB-	omvd") at inge from inber 7,	
						Base	e Penalty	\$25,000
>> Env	/ironme	ntal, Propei	rty and Huma	n Health Matrix	(
		_		Harm				
		Release	Major	Moderate Mino	r			
OR		Actual		Х		_		
		Potential				Percent 15.0%		
> > Drog	aramma	tic Matrix						
>>5100	gramma	tic Matrix Falsification	Major	Moderate Mino	r			
		Tuisineation	Wajor	William IVIII IVII		Percent 0.0%		
				, , , , , , , , , , , , , , , , , , ,		0.070		
	Matrix Notes			•	th or environme	t amounts of pollutant ntal receptors as a res		
					Ad	justment	\$21,250	
							Г	¢2.750
							L	\$3,750
Violatio	on Event	ts						
			_			_		
		Number of \	/iolation Events	3	38	Number of violation of	days	
			daily weekly monthly			Violation Base	⊇ Bonalty√	\$11,250
			quarterly semiannual	X		Violation base	Fenanty	\$11,250
			annual					
			single event					
				1				
			•			compliance that occur 6 to September 9, 20		
Good F	aith Effo	orts to Com	vlq	25.0%			Reduction	\$2,812
					to EDPRP/Settleme			
			Extraordinary					
			Ordinary	Х]		
			N/A					
			Notes	The Respondent con September 9, 2016	•			
						Violation	Subtotal	\$8,438
Econon	nic Bene	fit (EB) for	this violation	n		Statutory Limit	Test	
		Estimate	ed EB Amount	\$	421	Violation Final Pena	alty Total	\$17,213
				This violeties 5	inal Assassas'	Donalty (adicioted fo	or limita)	¢17 010
				inis violation F	ırıaı Assessed I	Penalty (adjusted fo	ווייני (Imits	\$17,213

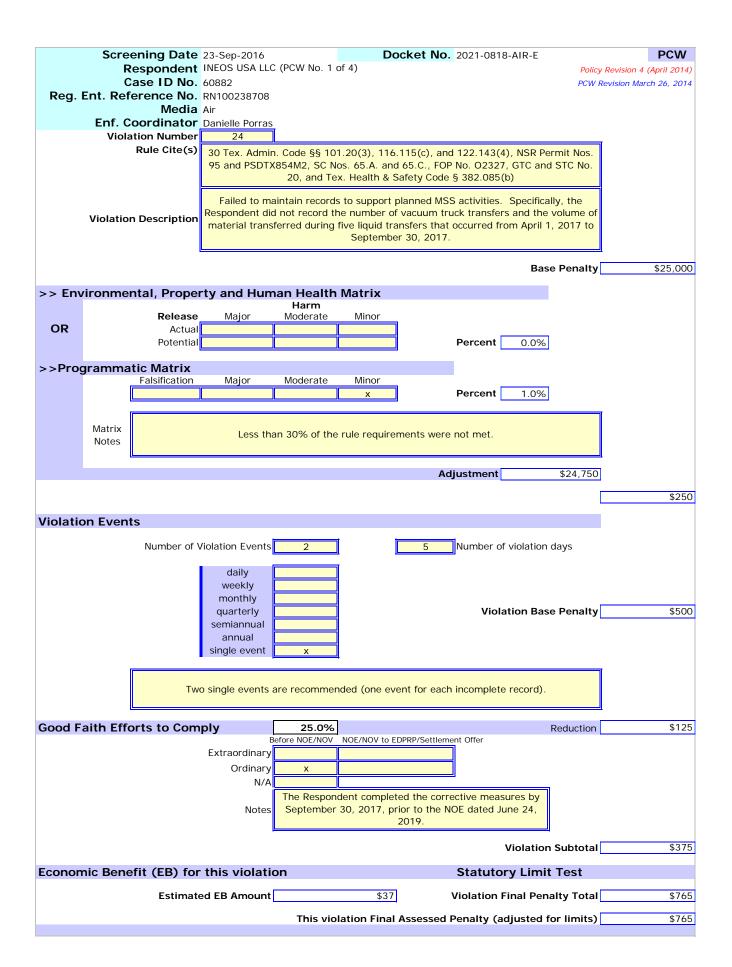
	E	conomic	Benefit	Wo	rksheet		
Respondent	INEOS USA LL	C (PCW No. 1 of	4)				
Case ID No.	60882						
Reg. Ent. Reference No.	RN100238708						
Media	Air					Percent Interest	Years of
Violation No.	21					Percent Interest	Depreciation
						5.0	15
	Item Cost	Date Required	Final Date	Yrs	Interest Saved	Costs Saved	EB Amount
Item Description		•					
rtem Bescription							
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	7-Nov-2015	9-Sep-2016	0.84	\$421	n/a	\$421
	Estimated c	ost to implement	measures in ord	ler to co	omply with the am	monia concentratio	n limit for the
Notes for DELAYED costs	Steam Crackir	ng Furnace, EPN D	B-109. The Da	te Requ	uired is the first da	te of non-compliand	e and the Final
			Date is th	ne date	of compliance.		
	0.010111	N. 1.75		••			1 4 - 2
Avoided Costs	ANNU	ALIZE avoided c	osts before en			one-time avoide	·
Disposal				0.00	\$0	\$0	\$0
Personnel				0.00	\$0	\$0 \$0	\$0
Inspection/Reporting/Sampling Supplies/Equipment				0.00	\$0 \$0	\$0 \$0	\$0 \$0
Financial Assurance				0.00	\$0	\$0 \$0	\$0 \$0
ONE-TIME avoided costs				0.00	\$0	\$0 \$0	\$0 \$0
Other (as needed)				0.00	\$0	\$0 \$0	\$0
Other (as needed)				0.00	\$0	\$ U	\$0
Notes for AVOIDED costs							
Approx. Cost of Compliance		\$10,000			TOTAL		\$421
		•					<u> </u>

		ening Date			Docket No. 2021-0818-AIR-E		PCW
				(PCW No. 1 of 4)		Policy	Revision 4 (April 2014)
_		ase ID No.				PCW F	Revision March 26, 2014
Reg.	Ent. Ref	erence No.					
	Enf C	Media	Danielle Porras				
		ation Number		[
	*1010	Rule Cite(s)		0 1 66 40(0()(0)	1/4) 1400 440/4) FOR N	20007 070	
			30 Tex. Admin		and (4) and 122.143(4), FOP No. (Health & Safety Code § 382.085(b		
			und	OTO No. 22, and Tox.	Tiediti' & Salety Sode 3 502.000(2	,	
			Failed to prov	ride records upon reque	est and maintain records containing	g sufficient	
				•	oliance with all applicable Permits b	-	
	Violatio	n Description	, ,		ndent was requested to provide the		
			_		o demonstrate compliance for each SR Authorization Table of FOP No.		
				•	the requested records were not pro	-	
					Ва	ase Penalty	\$25,000
s s En	vironmo	ntal Drana	rty and Hum	an Haalth Matrix	,		
>> EII	VIIOIIIIE	iitai, Propei	ty and nun	nan Health Matrix Harm			
		Release	Major	Moderate Minor			
OR		Actual					
		Potential			Percent 0.09	6	
>>Pro	gramma	tic Matrix					
77110	gramma	Falsification	Major	Moderate Minor	<u> </u>		
				Х	Percent 7.09	6	
							<u>, </u>
	Matrix						
	Notes	IVI	ore than 30% b	ut less than 70% of the	e rule requirements were not met.		
					Adjustment	\$23,250	
							04.750
							\$1,750
Violati	on Even	ts					
		Number of \	/iolation Events	1	74 Number of violation	n dave	
		Number of V	riolation Events		74 Number of violation	iii days	
			daily				
			weekly				
			monthly			_	===
			quarterly		Violation Ba	ase Penalty	\$1,750
			semiannual annual				
			single event	Х			
		'	-				
				0			
				One single event is r	econinended.		
							1
Good F	aith Effo	orts to Com		0.0% efore NOE/NOV NOE/NOV	to EDPRP/Settlement Offer	Reduction	\$0
			Extraordinary	S.S. C IVOL/INOV INOL/INOV	to 25 Revocation one		
			Ordinary				
			N/A	Х			
				The Respondent doos	not meet the good faith criteria fo	r	
			Notes	•	this violation.		
					Violatio	on Subtotal	\$1,750
Econor	mic Posc	ofit (ED) for	this violation	nn -	Statutanulim	it Tost	
ECOHOL	mic bene	:III (ED) 10r	uns violati	JII	Statutory Lim	iit iest	
		Estimate	ed EB Amount	\$5	Violation Final Pe	nalty Total	\$3,115
				This violation Fi	nal Assessed Penalty (adjusted	l for limits)	\$3,115
					, , , , , , , , , , , , , , , , , , ,		

	E	conomic	Benefit	Woi	rksheet		
Respondent	INEOS USA LL	.C (PCW No. 1 of 4	1)				
Case ID No.	60882						
Reg. Ent. Reference No.	RN100238708						
Media							Years of
Violation No.						Percent Interest	Depreciation
Violation No.	22					- o	
						5.0	15
	Item Cost	Date Required	Final Date	Yrs	Interest Saved	Costs Saved	EB Amount
Item Description							
Delayed Costs							
Equipment				0.00	\$0	\$0	\$0
Buildings				0.00	\$0	\$0	\$0
Other (as needed)				0.00	\$0	\$0	\$0
Engineering/Construction				0.00	\$0	\$0	\$0
Land	¢1.500	22 Feb 2017	1 1 2025	0.00	\$0	n/a	\$0
Record Keeping System Training/Sampling	\$1,500	23-Feb-2017	1-Jan-2025	7.86	\$590 \$0	n/a n/a	\$590 \$0
Remediation/Disposal				0.00	\$0	n/a	\$0 \$0
Permit Costs				0.00	\$0	n/a	\$0 \$0
Other (as needed)				0.00	\$0	n/a	\$0 \$0
other (as needed)		<u> </u>					
						nt information to der	
	•	•			•	ted in the NSR Auth	
Notes for DELAYED costs						it at the request of p	
	the Commis	ssion. The Date R	•		•	vas due and the Fina	al Date is the
			estimate	ed date	of compliance.		
Avoided Costs	ANNI I	ALLZE avoided co	osts hefore er	terina	item (except for	one-time avoide	d costs)
Disposal	ANNO	ALIZE avoided C	osts before er	0.00	\$0	\$0	\$0
Personnel				0.00	\$0	\$0 \$0	\$0 \$0
Inspection/Reporting/Sampling				0.00	\$0	\$0	\$0
Supplies/Equipment				0.00	\$0	\$0	\$0
Financial Assurance				0.00	\$0	\$0	\$0
ONE-TIME avoided costs				0.00	\$0	\$0	\$0
Other (as needed)				0.00	\$0	\$0	\$0
Notes for AVOIDED costs							
Approx. Cost of Compliance		\$1,500			TOTAL		\$590
Approx. cost or compliance	<u> </u>	Ψ1,300			IOIAL		Ψυσου

		ening Date		Docket No. 2021-0818-AIR-E	PCW
		-		C (PCW No. 1 of 4)	cy Revision 4 (April 2014)
_		Case ID No.		PCW	Revision March 26, 2014
Reg.	Ent. Rei	ference No.			
	Fnf (Media Coordinator	Danielle Porras		
		ation Number			
		Rule Cite(s)		. Code §§ 122.143(4) and 122.145(2)(A), FOP No. 02327, GTC, and	1
			30 Tex. Admii	Tex. Health & Safety Code § 382.085(b)	
				t all instances of deviations. Specifically, the deviation reports for the 15 through March 31, 2016 and April 1, 2016 through September 30,	
				g periods did not include the deviations for failing to obtain a revision	
	Violatio	n Description	for FOP No. O2	2327 prior to operating emission units at the site; failing to submit an	
				for a revision to FOP No. O2327 for those activities at a site which	
			-	I, or remove one or more permit terms or conditions; and failing to mit the 40 CFR Part 63 Subpart ZZZZ compliance reports.	
				Base Penalty	\$25,000
					, , , , , , , , , , , , , , , , , , , ,
>> Env	vironme	ntal, Prope	rty and Hun	nan Health Matrix Harm	
		Release	Major	Moderate Minor	
OR		Actual			
		Potential		Percent 0.0%	
> > Dro	aramma	ntic Matrix			
>>PI 0	gi amma	Falsification	Major	Moderate Minor	
				x Percent 1.0%	
	Matrix				
	Notes		Less th	an 30% of the rule requirements were not met.	
					_
				Adjustment \$24,750	D
					\$250
					,===
Violati	on Even	ts			
		Number of \	/iolation Events	2 373 Number of violation days	
			daily		
			weekly monthly		
			quarterly	Violation Base Penalty	\$500
			semiannual		
			annual		
			single event	X	
					1
				Two single events are recommended.	
					<u></u>
Good F	aith Eff	orts to Com	ply	0.0% Reduction	\$0
			E	efore NOE/NOV NOE/NOV to EDPRP/Settlement Offer	
			Extraordinary		
			Ordinary		
			N/A	X	
			Notes	The Respondent does not meet the good faith criteria for	
				this violation.	
				Violation Subtota	\$500
					\$500
Econor	mic Bene	efit (EB) for	this violati	on Statutory Limit Test	
		Estimate	ed EB Amount	\$217 Violation Final Penalty Tota	\$890
1				This violation Final Assessed Penalty (adjusted for limits)	\$890

	Ed	conomic	Benefit	Woı	rksheet					
		C (PCW No. 1 of 4	1)							
Case ID No.										
Reg. Ent. Reference No. Media Violation No.	Air					Percent Interest	Years of Depreciation			
11010111111						5.0	15			
	Item Cost	Date Required	Final Date	Yrs	Interest Saved	Costs Saved	EB Amount			
Item Description										
rtem Bescription										
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)	\$500	30-Apr-2016	1-Jan-2025	8.68	\$217	n/a	\$217			
Notes for DELAYED costs	obtain a re application for or more per reports (\$250 See the Ecc	Estimated cost to submit the revised deviation reports for the October 1, 2015 through March 31, 2016 and April 1, 2016 through September 30, 2016 reporting periods to report the deviations for failing to to obtain a revision for FOP No. O2327 prior to operating emission units at the site; failing to submit an application for a revision to FOP No. O2327 for those activities at a site which change, add, or remove one or more permit terms or conditions; and failing to submit the 40 CFR Part 63 Subpart ZZZZ compliance reports (\$250/deviation report). The Date Required is the date the first deviation report was due and the Final Date is the estimated date of compliance. See the Economic Benefit in Violation No. 3 of PCW No. 1 of 4 for implementing measures designed to ensure that all instances of deviations are reported in a timely manner.								
Avoided Costs	ANNUA	ALIZE avoided co	osts before er		item (except for	one-time avoide	d costs)			
Disposal				0.00	\$0	\$0	\$0			
Personnel				0.00	\$0	\$0	\$0			
Inspection/Reporting/Sampling				0.00	\$0	\$0	\$0			
Supplies/Equipment				0.00	\$0	\$0	\$0			
Financial Assurance				0.00	\$0	\$0	\$0			
ONE-TIME avoided costs				0.00	\$0	\$0	\$0			
Other (as needed)				0.00	\$0	\$0	\$0			
Notes for AVOIDED costs										
Approx. Cost of Compliance		\$500			TOTAL		\$217			



	E(conomic	Benefit	Wo	rksheet		
Respondent	INEOS USA LL	.C (PCW No. 1 of	4)				
Case ID No.	60882	•	•				
Reg. Ent. Reference No.							
Media							Years of
						Percent Interest	
Violation No.	24						Depreciation
						5.0	15
	Item Cost	Date Required	Final Date	Yrs	Interest Saved	Costs Saved	EB Amount
Item Description		•					
rtem bescription							
5.1							
Delayed Costs	<u> </u>	11 1				4.0	4.0
Equipment				0.00	\$0	\$0	\$0
Buildings				0.00	\$0	\$0	\$0
Other (as needed)				0.00	\$0	\$0	\$0
Engineering/Construction				0.00	\$0 \$0	\$0	\$0
Land	¢1 F00	1 4 2017	20 C 2017	0.00		n/a	\$0
Record Keeping System	\$1,500	1-Apr-2017	30-Sep-2017	0.50	\$37 \$0	n/a n/a	\$37 \$0
Training/Sampling Remediation/Disposal				0.00	\$0	n/a	\$0 \$0
Permit Costs				0.00	\$0	n/a	\$0
Other (as needed)				0.00	\$0 \$0	n/a	\$0
Notes for DELAYED costs		ansferred during t	he liquid transfe	ers supp	porting planned MS	um truck transfers a SS activities. The D date of compliance	ate Required is
Avoided Costs	ANNU	ALIZE avoided c	osts before en	tering	item (except for	one-time avoide	d costs)
Disposal				0.00	\$0	\$0	\$0
Personnel				0.00	\$0	\$0	\$0
Inspection/Reporting/Sampling				0.00	\$0	\$0	\$0
Supplies/Equipment				0.00	\$0	\$0	\$0
Financial Assurance				0.00	\$0	\$0	\$0
ONE-TIME avoided costs				0.00	\$0	\$0	\$0
Other (as needed)				0.00	\$0	\$0	\$0
Notes for AVOIDED costs							
Approx. Cost of Compliance		\$1,500			TOTAL		\$37

		ening Date			Docket No.	2021-0818-AIR-E		PCW
				(PCW No. 1 of 4)			Policy	Revision 4 (April 2014)
D		ase ID No.					PCW R	evision March 26, 2014
Reg.	ent. Ref	erence No. Media						
	Fnf C		Danielle Porras					
		ation Number						
				Code §§ 101.20(3),	116 115(b)(2)(F)	and (c) and 122 14	3(4) NSR	
		, ,	Permit Nos. 95	and PSDTX854M2, S and Tex. Health	C No. 2, FOP No.	O2327, GTC and ST	C No. 20,	
	Violatio	n Description	MAER of 45. hours and exc 20.82 lbs/hr for for the No. 1 (oly with the MAERs. S 11 lbs/hr by a range fi eeded the CO MAER of r a total of 11 hours of Diefins Flare, EPN DM 04 lbs of NOx emissio	rom 0.23 lb/hr to of 231.90 lbs/hr b on November 21, -1101, resulting i	4.59 lbs/hr for a tot by a range from 5.24 2016 and November n the unauthorized r	al of 12 lbs/hr to 22, 2016	
		mtal Duamas		on Hoolth Matri		Bas	e Penalty	\$25,000
>> En	vironme	ntai, Propei	rty and Hum	an Health Matrix Harm	х			
		Release	Major	Moderate Mino	or			
OR		Actual		X		_		
		Potential				Percent 15.0%		
>>Pro	gramma	tic Matrix						
	Ĭ	Falsification	Major	Moderate Mino	or			
						Percent 0.0%		
		Human boolth	or the environm	ant has been expess	d to incignificant	amounts of pollutan	ts that did	
	Matrix Notes			nent has been expose tective of human heal violatio	lth or environmer	•		
					Δdi	justment	\$21,250	
					710	ustinont	Ψ21,200	
							L	\$3,750
Violati	on Event	ts						
			F			1		
		Number of \	/iolation Events	1	2	Number of violation	days	
			daily					
			weekly					
			monthly				-	
			quarterly	X		Violation Bas	e Penalty	\$3,750
			semiannual annual					
			single event					
				<u> </u>				
		One quart	•	ommended for the ins		•	ed on	
			Nov	rember 21, 2016 and	November 22, 20	016.		
			-					****
Good F	Faith Effo	orts to Com		25.0% NOE/NOV	V to EDPRP/Settleme		Reduction	\$937
			Extraordinary	102/1101	V to EBI III / Cottleins			
			Ordinary	х				
			N/A					
			Notes	The Respondent co November 29, 2010				
			L			Violation	Subtotal	\$2,813
Fconor	mic Reno	ofit (FR) for	this violation	n e		Statutory Limit	Test	
LCOTIO	THE DELLE	ATT (LD) TO	tina violatio			Clatatory Limit	. 1031	
		Estimate	ed EB Amount		\$11	/iolation Final Pen	alty Total	\$5,738
				This violation F	inal Assessed F	Penalty (adjusted f	or limits)	\$5,738

	E	conomic	Benefit	Woı	rksheet		
Respondent	INEOS USA LL	C (PCW No. 1 of	4)				
Case ID No.	60882						
Rea. Ent. Reference No.	RN100238708						
Media							Years of
Violation No.	25					Percent Interest	Depreciation
						5.0	15
	Item Cost	Date Required	Final Date	Yrs	Interest Saved	Costs Saved	EB Amount
Item Description		·					
1 to 2 cool .pc.							
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	21-Nov-2016	29-Nov-2016	0.02	\$11	n/a	\$11
Notes for DELAYED costs		ne No. 1 Olefins F	lare, EPN DM-11	01. Th		omply with the NOx s the first date of no note.	
Avoided Costs	ANNUA	ALIZE avoided c	osts before en	tering	item (except for	one-time avoide	d costs)
Disposal				0.00	\$0	\$0	\$0
Personnel				0.00	\$0	\$0	\$0
Inspection/Reporting/Sampling				0.00	\$0	\$0	\$0
Supplies/Equipment				0.00	\$0	\$0	\$0
Financial Assurance				0.00	\$0	\$0	\$0
ONE-TIME avoided costs				0.00	\$0	\$0	\$0
Other (as needed)				0.00	\$0	\$0	\$0
Notes for AVOIDED costs							
Approx. Cost of Compliance		\$10,000			TOTAL		\$11

	E	conomic	Benefit	VVO	rksheet		
Respondent	INEOS USA LL	C (PCW No. 1 of 4	4)				
Case ID No.							
Reg. Ent. Reference No.							
Media							Years of
						Percent Interest	Depreciation
Violation No.	20						
						5.0	15
	Item Cost	Date Required	Final Date	Yrs	Interest Saved	Costs Saved	EB Amount
Item Description							
Delayed Costs							
Equipment				0.00	\$0	\$0	\$0
Buildings				0.00	\$0	\$0	\$0
Other (as needed)				0.00	\$0	\$0	\$0
Engineering/Construction				0.00	\$0	\$0	\$0
Land				0.00	\$0	n/a	\$0
Record Keeping System				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	1-Oct-2016	31-Jul-2017	0.83	\$415	n/a	\$415
Notes for DELAYED costs	injection, a comply with	ind make adjustm the NOx, CO, and	nents to the furn NH3 hourly MA	nace to ERs an	limit the firing rate d NOx annual MAE	a system heater, reseand NOx emission R for Furnace No. 1 al Date is the date	s in order to 05, EPN DDB-
Avoided Costs	ANNU <i>A</i>	ALIZE avoided c	osts before er	tering	item (except for	one-time avoide	d costs)
Disposal				0.00	\$0	\$0	\$0
Personnel				0.00	\$0	\$0	\$0
Inspection/Reporting/Sampling				0.00	\$0	\$0	\$0
Supplies/Equipment				0.00	\$0	\$0	\$0
Financial Assurance				0.00	\$0	\$0	\$0
ONE-TIME avoided costs				0.00	\$0	\$0	\$0
Other (as needed)				0.00	\$0	\$0	\$0
Notes for AVOIDED costs							
Approx. Cost of Compliance		\$10,000			TOTAL		\$415

Respondent Case ID No. Reg. Ent. Reference No. Media Enf. Coordinator	INFOS LISA LLC (F		Docket No. 2021-0818-AIR-E	PCW
Reg. Ent. Reference No. Media		'CW No. 1 of 4)		Policy Revision 4 (April 2014)
Media				PCW Revision March 26, 2014
Violation Number	27			
Rule Cite(s)	30 Tex. Admin. Co	ode §§ 101.20(3), 11	16.115(b)(2)(F) and (c), and 122.14	<mark>13(4), NSR</mark>
	Permit Nos. 95 ar		No. 2, FOP No. 02327, GTC and ST	⁻ C No. 20,
			Safety Code § 382.085(b)	1 2.2
		•	pecifically, the Respondent exceeded no 0.59 lb/hr to 12.86 lbs/hr for a tot	
Violation Description		, ,	2016 to August 9, 2017 and exceede	
Violation Description		•	r one hour on August 25, 2017 for t	
	Cracking Furnace,		ing in the unauthorized release of 2. 5.47 lbs of NH3 emissions.	2.88 lbs of
L		CO CITISSIONS AND	3.47 163 01 W13 01113310113.	
			Bas	e Penalty \$25,000
>> Environmental, Proper	ty and Humai	Health Matrix		
	-	Harm		
OR Release	Major N	Moderate Minor		
Potential		X	Percent 15.0%	
			10.070	
>>Programmatic Matrix				
Falsification	Major N	Moderate Minor	Percent 0.0%	
			Percent 0.078	
Human health	or the environmen	nt has been exposed	to insignificant amounts of pollutan	ts that did
Matrix		tive of human health	n or environmental receptors as a re	
Notes		violation	1.	
			Adjustment	\$21,250
			Adjustment	Ψ21,230
				\$3,750
Violation Events				
Number of V	iolation Events	2	5 Number of violation	days
	daily			
	weekly			
	monthly			
	quarterly		Violation Bas	- D Lt
		X		e Penalty \$7,500
	semiannual			e Penalty \$7,500
	annual single event			e Penalty \$7,500
	annual			e Penaity \$7,500
Two semiannu	annual single event	mmended for the ins	stances of non-compliance that occu	
Two semiannu	annual single event	mmended for the instable 18, 2016 to At	•	
	annual single event al events are reco	tober 18, 2016 to Au	ugust 25, 2017.	urred from
Two semiannu Good Faith Efforts to Comp	annual single event all events are reco	25.0%	ugust 25, 2017.	
	annual single event all events are reco	25.0%	ugust 25, 2017.	urred from
	annual single event all events are reco	25.0%	ugust 25, 2017.	urred from
	annual single event are reco	25.0% re NOE/NOV NOE/NOV 1	ugust 25, 2017.	urred from
	annual single event are reco	25.0% 	to EDPRP/Settlement Offer	urred from
	annual single event are reco	25.0% The NOE/NOV NOE/NOV IN The Respondent compared to Attack the	ugust 25, 2017.	urred from
	annual single event are reco	25.0% The NOE/NOV NOE/NOV IN The Respondent compared to Attack the	to EDPRP/Settlement Offer	urred from
	annual single event are reco	25.0% The NOE/NOV NOE/NOV IN The Respondent compared to Attack the	to EDPRP/Settlement Offer pleted the corrective measures on r to the NOE dated June 24, 2019.	urred from
	annual single event all events are reco	25.0% The NOE/NOV NOE/NOV to According to Ac	to EDPRP/Settlement Offer pleted the corrective measures on r to the NOE dated June 24, 2019.	Reduction \$1,875
Good Faith Efforts to Comp	annual single event all events are record or	25.0% The NOE/NOV NOE/NOV to According to Ac	pleted the corrective measures on r to the NOE dated June 24, 2019. Violation Statutory Limit	Reduction \$1,875 Subtotal \$5,625
Good Faith Efforts to Comp	annual single event all events are reco	25.0% TENDE NOE/NOV NOE/NOW N	to EDPRP/Settlement Offer pleted the corrective measures on r to the NOE dated June 24, 2019. Violatior	Reduction \$1,875 Subtotal \$5,625 t Test alty Total \$11,475

	E.	conomic	Benefit	vvoi	rksneet										
Respondent	INEOS USA LL	C (PCW No. 1 of	4)												
Case ID No.	60882														
Rea. Ent. Reference No.	RN100238708														
Media							Years of								
Violation No.	27					Percent Interest	Depreciation								
						5.0	15								
	Item Cost	Date Required	Final Date	Yrs	Interest Saved	Costs Saved	EB Amount								
Item Description		•													
rtem Bescription															
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	18-Oct-2016	25-Aug-2017	0.85	\$426	n/a	\$426								
	Estimated	rost to implement	measures in or	der to d	comply with the CC	and NH3 hourly M	ΔERs for the								
Notes for DELAYED costs						te of non-compliand									
Notes for DELATED costs	Steam Crackii	ig ruillace, Eriv L				te of flori-compliant	e and the milai								
			Date is tr	ie date	of compliance.										
Avoided Costs	ANNU	ALIZE avoided c	osts before en	<u> </u>											
Disposal				tering	item (except for	one-time avoide	d costs)								
Dispusai				tering 0.00	item (except for \$0	one-time avoide	d costs)								
Personnel							·								
•				0.00	\$0	\$0	\$0								
Personnel				0.00	\$0 \$0	\$0 \$0	\$0 \$0								
Personnel Inspection/Reporting/Sampling				0.00 0.00 0.00	\$0 \$0 \$0	\$0 \$0 \$0	\$0 \$0 \$0								
Personnel Inspection/Reporting/Sampling Supplies/Equipment				0.00 0.00 0.00 0.00	\$0 \$0 \$0 \$0	\$0 \$0 \$0 \$0	\$0 \$0 \$0 \$0 \$0								
Personnel Inspection/Reporting/Sampling Supplies/Equipment Financial Assurance				0.00 0.00 0.00 0.00 0.00	\$0 \$0 \$0 \$0 \$0 \$0	\$0 \$0 \$0 \$0 \$0	\$0 \$0 \$0 \$0 \$0 \$0								
Personnel Inspection/Reporting/Sampling Supplies/Equipment Financial Assurance ONE-TIME avoided costs				0.00 0.00 0.00 0.00 0.00	\$0 \$0 \$0 \$0 \$0 \$0 \$0	\$0 \$0 \$0 \$0 \$0 \$0	\$0 \$0 \$0 \$0 \$0 \$0 \$0								
Personnel Inspection/Reporting/Sampling Supplies/Equipment Financial Assurance ONE-TIME avoided costs Other (as needed)				0.00 0.00 0.00 0.00 0.00	\$0 \$0 \$0 \$0 \$0 \$0 \$0	\$0 \$0 \$0 \$0 \$0 \$0	\$0 \$0 \$0 \$0 \$0 \$0 \$0								
Personnel Inspection/Reporting/Sampling Supplies/Equipment Financial Assurance ONE-TIME avoided costs				0.00 0.00 0.00 0.00 0.00	\$0 \$0 \$0 \$0 \$0 \$0 \$0	\$0 \$0 \$0 \$0 \$0 \$0	\$0 \$0 \$0 \$0 \$0 \$0 \$0								
Personnel Inspection/Reporting/Sampling Supplies/Equipment Financial Assurance ONE-TIME avoided costs Other (as needed)				0.00 0.00 0.00 0.00 0.00	\$0 \$0 \$0 \$0 \$0 \$0 \$0	\$0 \$0 \$0 \$0 \$0 \$0	\$0 \$0 \$0 \$0 \$0 \$0 \$0								
Personnel Inspection/Reporting/Sampling Supplies/Equipment Financial Assurance ONE-TIME avoided costs Other (as needed)				0.00 0.00 0.00 0.00 0.00	\$0 \$0 \$0 \$0 \$0 \$0 \$0	\$0 \$0 \$0 \$0 \$0 \$0	\$0 \$0 \$0 \$0 \$0 \$0 \$0								
Personnel Inspection/Reporting/Sampling Supplies/Equipment Financial Assurance ONE-TIME avoided costs Other (as needed) Notes for AVOIDED costs				0.00 0.00 0.00 0.00 0.00	\$0 \$0 \$0 \$0 \$0 \$0 \$0	\$0 \$0 \$0 \$0 \$0 \$0	\$0 \$0 \$0 \$0 \$0 \$0 \$0								
Personnel Inspection/Reporting/Sampling Supplies/Equipment Financial Assurance ONE-TIME avoided costs Other (as needed)		\$10,000		0.00 0.00 0.00 0.00 0.00	\$0 \$0 \$0 \$0 \$0 \$0 \$0	\$0 \$0 \$0 \$0 \$0 \$0	\$0 \$0 \$0 \$0 \$0 \$0 \$0								

		ening Date			Docket No. 2021-0818-A	IR-E	PCW
				(PCW No. 1 of 4)		Policy	Revision 4 (April 2014)
		ase ID No.				PCW R	Pevision March 26, 2014
Reg. E	nt. Ref		RN100238708				
	Enf C	Media	Danielle Porras				
		tion Number		[
	*1010	Rule Cite(s)					•
			30 Tex. Admin.		16.115(b)(2)(F) and (c), and		
			Permit Nos. 95		C No. 2, FOP No. O2327, GTC Safety Code § 382.085(b)	and STC NO. 20,	
				and row mount o	. callety sear 3 0021000(2)		
			Failed to con	anly with the MAED S	nocifically, the Decrendent ov	anadad tha CO	
			MAFR of 7.0		pecifically, the Respondent ex m 0.14 lb/hr to 55.97 lbs/hr fo		
	Violation	n Description		, ,	2016 to July 27, 2017 for the		
			Furnace, EPN	DDB-102B, resulting	in 172.79 lbs of unauthorized	CO emissions.	
						Base Penalty	\$25,000
_	-						
>> Env	ironmei	ntal, Propei	rty and Hum	nan Health Matrix Harm			
		Release	Major	Moderate Minor	<u>-</u>		
OR		Actual		Х			
		Potential			Percent	15.0%	
>> Drog	ıramma	tic Matrix					
>>Pi 0g	ji ai i ii i ia	Falsification	Major	Moderate Minor	-		
					Percent	0.0%	
				<u>'</u>			
	Matrix	Human health	or the environr	nent has been exposed	d to insignificant amounts of p	ollutants that did	
	Notes	not exceed lev	vels that are pro		h or environmental receptors	as a result of the	
				violatio	n.		
					Adjustment	\$21,250	
					Aujustinent	Ψ21,230	
							\$3,750
Violatio	n Evont	te					
violatio	n Eveni	15					
		Number of \	Violation Events	2	8 Number of vi	olation days	
		·					
			daily				
			weekly monthly				
			quarterly		Violatio	on Base Penalty	\$7,500
			semiannual	Х		on Dass I sharty	4.7000
			annual				
			single event				
	ı						
		Two semianni	ual events are re		stances of non-compliance th	at occurred from	
				October 21, 2016 to	July 27, 2017.		
0	.:.L E.C.			2F 204			A4 075
Good Fa	aith Effo	orts to Com		25.0% efore NOE/NOV NOE/NOV	to EDPRP/Settlement Offer	Reduction	\$1,875
			Extraordinary	I. I. S I. S I. I S I I I I I I I I I I	12 25.14.700thoment one		
			Ordinary	Х			
			N/A				
				The Perpendent com	uplated the corrective measure	os on	
			Notes		pleted the corrective measure to the NOE dated June 24, 20		
				, , , ,			
					Vio	olation Subtotal	\$5,625
						_	
Foonara	io Dono	fit (ED) for	this violet	an .	Ctatutama	Limit Toot	
Econom	ic Bene	fit (EB) for	this violation			Limit Test	
Econom	ic Bene		this violation			Limit Test al Penalty Total	\$11,475
Econom	nic Bene			\$:		al Penalty Total	\$11,475 \$11,475

	E(conomic	Benefit	Wo	rksheet		
Respondent	INEOS USA LL	C (PCW No. 1 of 4	4)				
Case ID No.	60882						
Rea. Ent. Reference No.	RN100238708						
Media							Years of
Violation No.						Percent Interest	Depreciation
						5.0	15
	Item Cost	Date Required	Final Date	Yrs	Interest Saved	Costs Saved	EB Amount
Item Description		•					
rtem Bescription							
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	21-Oct-2016	27-Jul-2017	0.76	\$382	n/a	\$382
Notes for DELAYED costs			Date Required	is the fi		ourly MAER for the s mpliance and the Fi	
Avoided Costs	ANNUA	ALIZE avoided c	osts before er	tering	item (except for	one-time avoide	d costs)
Disposal				0.00	\$0	\$0	\$0
Personnel				0.00	\$0	\$0	\$0
Inspection/Reporting/Sampling				0.00	\$0	\$0	\$0
Supplies/Equipment				0.00	\$0	\$0	\$0
Financial Assurance				0.00	\$0	\$0	\$0
ONE-TIME avoided costs				0.00	\$0	\$0	\$0
Other (as needed)				0.00	\$0	\$0	\$0
Notes for AVOIDED costs							
Approx. Cost of Compliance		\$10,000			TOTAL		\$382

	E	conomic	Benefit	Wol	rksheet		
Respondent	INEOS USA LL	C (PCW No. 1 of	4)				
Case ID No.	60882						
Rea. Ent. Reference No.	RN100238708						
Media							Years of
Violation No.	29					Percent Interest	Depreciation
						5.0	15
	Item Cost	Date Required	Final Date	Yrs	Interest Saved	Costs Saved	EB Amount
Item Description		•					
rtem Bescription							
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	24-Nov-2016	20-Sep-2017	0.82	\$411	n/a	\$411
	Estimated	cost to implement	moacuroe in or	dor to	comply with the CC	and NH3 hourly M	AEDs for the
Natas for DELAVED and						te of non-compliand	
Notes for DELAYED costs	Steam Crackii	ig ruillace, EPN L				te of flori-compliant	e and the Final
			Date is tr	ie date	of compliance.		
Avoided Costs	ANNU	ALIZE avoided c	osts before en	tering	item (except for	one-time avoide	d costs)
Disposal				0.00	\$0	\$0	\$0
Personnel				0.00	\$0	\$0	\$0
Inspection/Reporting/Sampling				0.00	\$0	\$0	\$0
Supplies/Equipment				0.00	\$0	\$0	\$0
Financial Assurance				0.00	\$0	\$0	\$0
ONE-TIME avoided costs				0.00	\$0	\$0	\$0
				0.00	\$0	\$0	40
Other (as needed)				0.00		Ψ0	\$0
Other (as needed)		<u> </u>		0.00		ΨΟ	\$0
, ,		<u>JI</u>		0.00	**	ΨΟ	\$0
Other (as needed) Notes for AVOIDED costs		JI		0.00	¥ *	Ψ0	\$0
, ,		<u> </u>		0.00	, , , , , , , , , , , , , , , , , , ,	Ψ0	\$0
, ,				0.00	, , , , , , , , , , , , , , , , , , ,	Ψ0	\$0
Notes for AVOIDED costs		\$10.000l		0.00		ΨÜ.	
, ,		\$10,000		0.00	TOTAL	Ψ ⁰	\$411

		ening Date			Docket No.	2021-0818-AIR-E		PCW
				(PCW No. 1 of 4)			Policy Rev	ision 4 (April 2014)
		ase ID No.					PCW Revis	ion March 26, 2014
Reg.	Ent. Ref		RN100238708					
	Enf C	Media	Danielle Porras					
		ation Number						
	VIOIC			Codo 88 101 20(2)	116 115(b)(2)(E)	and (c), and 122.143(4)	NSD	
		11410 0110(0)	Permit Nos. 95	and PSDTX854M2.	SC No. 2. FOP No.	O2327, GTC and STC No), NSK), 20,	
					& Safety Code § 3		,	
						espondent exceeded the .55 lbs/hr for a total of s		
	Violatio	n Description				mber 26, 2017 for the S		
		•		-	•	26 lbs of unauthorized C		
					emissions.			
						Base Pe	enalty	\$25,000
>> Env	vironme	ntal, Propei	rty and Hum	an Health Matr	ix			
		_	-	Harm				
OR		Release Actual	Major	Moderate Min				
OK		Potential		X		Percent 15.0%		
		roteritia				13.070		
>>Prog	gramma	tic Matrix						
		Falsification	Major	Moderate Min				
						Percent 0.0%		
		Lluman hoalth	or the environm	ant has been evens	ad to insignificant	amounts of pollutants th	at did	
	Matrix			·	-	amounts of pollutants th tal receptors as a result		
	Notes	not exceed to	reis that are pro	violat		tarrecoptors as a result	or the	
					Adjı	ustment \$2	21,250	
								\$3,750
Violetia	F	. _						
violatio	on Even	ıs						
		Number of \	/iolation Events	2	4	Number of violation days	5	
		·						
			daily 					
			weekly					
			monthly quarterly			Violation Base Pe	enalty	\$7,500
			semiannual	Х				. ,
			annual					
			single event					
		Two seminann				compliance that occurred	d from	
			NO'	vember 28, 2016 to	September 26, 20	17.		
Good F	aith Eff	orts to Com	nly	25.0%		Dade	uction	\$1,875
COUG F	and Ell	J. 13 10 CUIII			OV to EDPRP/Settlemen		uction	Ψ1,073
			Extraordinary					
			Ordinary	Х				
			N/A					
				The Respondent co	•			
			Notes	September 26, 20	 prior to the NO 2019. 	E dated June 24,		
			<u> </u>		2017.			
						Violation Sub	ototal	\$5,625
Econon	nic Bene	efit (EB) for	this violation	on		Statutory Limit Te	st	
		, ,				_		¢44 475
		Estimate	ed EB Amount		\$414 V	iolation Final Penalty	rotai	\$11,475
						enalty (adjusted for li	:4-\	\$11,475

	E	conomic	Benefit	Wo	rksheet		
Respondent	INEOS USA LL	.C (PCW No. 1 of	4)				
Case ID No.	60882						
Reg. Ent. Reference No.	RN100238708						
Media	Air					Percent Interest	Years of
Violation No.	30					Percent Interest	Depreciation
						5.0	15
	Item Cost	Date Required	Final Date	Yrs	Interest Saved	Costs Saved	EB Amount
Item Description		•					
rtem Bescription							
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	28-Nov-2016	26-Sep-2017	0.83	\$414	n/a	\$414
	Estimated cos	t to implement me	easures in order	to com	only with the CO h	ourly MAER for the	Steam Cracking
Notes for DELAYED costs						mpliance and the Fi	
Notes for DELATED Costs	Turriace, Lin	I DDD-102D. THE	•		mpliance.	impliance and the m	nai Date is the
			uai	e or cor	прпансе.		
Avoided Costs	ANNUA	ALIZE avoided c	osts before er	tering	item (except for	one-time avoide	d costs)
Disposal				0.00	\$0	\$0	\$0
Personnel				0.00	\$0	\$0	\$0
Inspection/Reporting/Sampling				0.00	\$0	\$0	\$0
Supplies/Equipment				0.00	\$0	\$0	\$0
Financial Assurance				0.00	\$0	\$0	\$0
ONE-TIME avoided costs				0.00	\$0	\$0	\$0
Other (as needed)				0.00	\$0	\$0	\$0
Note: 6: AVOIDED							
Notes for AVOIDED costs							
	ı						
Annan Cast of Canaliana		¢10.000	ſ		TOTAL		¢414
Approx. Cost of Compliance		\$10,000			TOTAL		\$414

		ening Date			Do	cket No. 2021-0818-AIR-	E	PCW
			INEOS USA LLO	C (PCW No. 1	l of 4)		Policy	Revision 4 (April 2014)
D		ase ID No.					PCW R	evision March 26, 2014
кед.	Ent. Rei	erence No. Media	RN100238708					
	Fnf C		Danielle Porras					
		ation Number						
				Code 88 10	11 20(3) 116 1	15(b)(2)(F) and (c), and 122	2 143(4) NSR	
						2, FOP No. O2327, GTC and		
						ety Code § 382.085(b)	·	
					•	ically, the Respondent excee		
	Violatio	n Description		,	0	.14 lb/hr to 20.28 lbs/hr for		
				-		2016 to August 17, 2017 for 60.78 lbs of unauthorized		
			J		. 3			
							Doos Donolty	¢2F 000
						ı	Base Penalty	\$25,000
>> Env	vironme	ntal, Prope	rty and Hum		h Matrix			
		Release	Major	Harm Moderate	Minor			
OR		Actual		sucrute	X			
		Potential				Percent 15.0	0%	
_								
>>Pro	gramma	tic Matrix Falsification	Major	Moderate	Minor			
		1 disinication	Wajoi	Woderate	WIIITOI	Percent 0.0	0%	
			,		-1			
	Matrix				•	nsignificant amounts of pollu		
	Notes	not exceed lev	els that are pro	tective of hu		environmental receptors as	a result of the	
					violation.			
						Adjustment	\$21,250	
								\$3,750
							L	\$3,730
Violation	on Even	ts						
		Number of \	Violation Events	2	-	9 Number of violat	ion days	
					<u>-</u> 4	, rumber er vielat	e daye	
			daily					
			weekly					
			monthly		_	Violation	Dana Danaku	¢7.500
			quarterly semiannual	Х	=	violation	Base Penalty	\$7,500
			annual		=			
			single event					
		Two semiann				ces of non-compliance that of	occurred from	
			ı	November 30	0, 2016 to Aug	ust 17, 2017.		
Good F	aith Eff	orts to Com	nly	25.0%			Reduction	\$1,875
Good	aith Ein	orts to com		efore NOE/NO		PRP/Settlement Offer	Reduction	\$1,075
			Extraordinary					
			Ordinary	Х				
			N/A					
			Nietee	The Respo	ndent complete	ed the corrective measures of	n	
			Notes	August 17,	2017, prior to	the NOE dated June 24, 201	9.	
						Viola	tion Subtotal	\$5,625
Econor	mic Bene	efit (EB) for	this violation	on		Statutory Li	mit Test	
		Fstimate	ed EB Amount		\$356	Violation Final I	Penalty Total	\$11,475
		_5,,,,,,,,	ount					
				This vi	olation Final	Assessed Penalty (adjuste	ed for limits)	\$11,475

	E	conomic	Benefit	Wo	rksheet		
Respondent	INEOS USA LL	.C (PCW No. 1 of	4)				
Case ID No.	60882						
Reg. Ent. Reference No.							
Media							Years of
Violation No.						Percent Interest	Depreciation
71014110111101						5.0	15
	Item Cost	Date Required	Final Date	Yrs	Interest Saved	Costs Saved	EB Amount
Item Description	rtem cost	Date Required	i iiidi Bate	5	interest outeu	oosis carea	LD /iiiiouni
item bescription							
Delayed Costs							
Delayed Costs Equipment		1		0.00	\$0	\$0	\$0
Equipment Buildings				0.00	\$0 \$0	\$0 \$0	\$0 \$0
Other (as needed)				0.00	\$0 \$0	\$0 \$0	\$0
Engineering/Construction				0.00	\$0	\$0 \$0	\$0
Land				0.00	\$0	n/a	\$0 \$0
Record Keeping System				0.00	\$0	n/a	\$0
Training/Sampling				0.00	\$0	n/a	\$0 \$0
Remediation/Disposal				0.00	\$0	n/a	\$0
Permit Costs				0.00	\$0	n/a	\$0
Other (as needed)	\$10,000	30-Nov-2016	17-Aug-2017	0.71	\$356	n/a	\$356
	Furnace, EPN	DB-108. The Dat	e Required is th	e first of of comp	date of non-compli- liance.	ourly MAER for the Sance and the Final [Date is the date
Avoided Costs	ANNUA	ALIZE avoided c	osts before en	tering	item (except for	one-time avoide	d costs)
Disposal				0.00	\$0	\$0	\$0
Personnel				0.00	\$0	\$0	\$0
Inspection/Reporting/Sampling				0.00	\$0	\$0	\$0
Supplies/Equipment				0.00	\$0	\$0	\$0
Financial Assurance				0.00	\$0	\$0	\$0
ONE-TIME avoided costs				0.00	\$0	\$0	\$0
Other (as needed)				0.00	\$0	\$0	\$0
Notes for AVOIDED costs							
Approx. Cost of Compliance		\$10,000			TOTAL		\$356

		ening Date			Doo	cket No. 2021-0818-AIR-E		PCW
			INEOS USA LLC	(PCW No.	1 of 4)		Policy	Revision 4 (April 2014)
D		ase ID No.					PCW R	Pevision March 26, 2014
Reg.	Ent. Ref	erence No. Media						
	Fnf C		Danielle Porras					
		ation Number	32					
		Rule Cite(s)		0-4- 00 1	1/ 115/5)/2)/5		Damest Na	
		. ,				and (c) and 122.143(4), NSR d STC No. 20, and Tex. Health		
			101, 0010.	1,101110.	Code § 38		a ballety	
					•	cally, the Respondent exceede 08 lb/hr to 27.36 lbs/hr for a t		
	Violatio	n Description				to January 27, 2017 for the N		
		·				Iting in 460.29 lbs of unauthor		
					emiss	ions.		
		•				_		405.000
						Ва	se Penalty	\$25,000
>> Env	vironme	ntal, Propei	ty and Hum	an Healt	h Matrix			
		Deleges	Maior	Harm	Minor			
OR		Release Actual	Major	Moderate	Minor			
O.K		Potential			^	Percent 15.0%	,	
			<u> </u>					
>>Pro	gramma	tic Matrix						
		Falsification	Major	Moderate	Minor	D	.7	
						Percent 0.0%	b l	
		Human boalth	or the environm	oont has bo	on ovnosod to it	nsignificant amounts of polluta	nts that did	
	Matrix				•	environmental receptors as a		
	Notes		·		violation.	·		
						Adjustment	\$21,250	
								\$3,750
Violati	on Even	ts						
		Number of \	/iolation Events	1		13 Number of violatio	n days	
					<u> </u>	<u> </u>	,	
			daily					
			weekly 					
			monthly quarterly			Violation Ba	so Bonalty	\$3,750
			semiannual	Х		Violation Ba	ise reliaity	\$3,730
			annual					
			single event					
		One quarte	rly event is reco	mmended f	for the instances	of non-compliance that occur	red from	
			V	lovember 6	, 2016 to Janua	ry 27, 2017.		
Cost	Tolth Ff	orto to O=	mly.	05.00			David III	#007
Good F	aiin Eff	orts to Com		25.09 efore NOE/NO		PRP/Settlement Offer	Reduction	\$937
			Extraordinary					
			Ordinary	Х				
			N/A				_	
				The Respo	ondent complete	d the corrective measures on		
			Notes			the NOE dated June 24, 2019		
			L				_	
						Violatio	n Subtotal	\$2,813
Econor	mic Bene	efit (ER) for	this violation	on		Statutory Lim	it Test	
	Deric					_		
		Estimate	ed EB Amount		\$112	Violation Final Pe	nalty Total	\$5,738
				This v	iolation Final A	Assessed Penalty (adjusted	for limits)	\$5,738

	E	conomic	Benefit	Woı	rksheet		
Respondent	INEOS USA LL	C (PCW No. 1 of	4)				
Case ID No.	60882						
Reg. Ent. Reference No.							
Media							Years of
Violation No.						Percent Interest	Depreciation
violation No.	32						
						5.0	15
	Item Cost	Date Required	Final Date	Yrs	Interest Saved	Costs Saved	EB Amount
Item Description							
Delayed Costs							
Equipment		1		0.00	\$0	\$0	\$0
Buildings				0.00	\$0	\$0 \$0	\$0 \$0
Other (as needed)				0.00	\$0	\$0 \$0	\$0 \$0
Engineering/Construction				0.00	\$0	\$0	\$0
Land				0.00	\$0	n/a	\$0
Record Keeping System				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	6-Nov-2016	27-Jan-2017	0.22	\$112	n/a	\$112
Notes for DELAYED costs		•	01B. The Date	Require		hourly MAER for the of non-compliance	
Avoided Costs	ANNUA	ALIZE avoided c	osts before en	tering	item (except for	one-time avoide	d costs)
Disposal				0.00	\$0	\$0	\$0
Personnel				0.00	\$0	\$0	\$0
Inspection/Reporting/Sampling				0.00	\$0	\$0	\$0
Supplies/Equipment				0.00	\$0	\$0	\$0
Financial Assurance				0.00	\$0	\$0	\$0
ONE-TIME avoided costs				0.00	\$0	\$0	\$0
Other (as needed)				0.00	\$0	\$0	\$0
Notes for AVOIDED costs							
Approx. Cost of Compliance		\$10,000			TOTAL		\$112

		ening Date			Docket No. 2021-	0818-AIR-E	PCW
				(PCW No. 1 of 4)		Poli	cy Revision 4 (April 2014)
		ase ID No.				PCW	Revision March 26, 2014
Reg. I	Ent. Ref		RN100238708				
	Enf C	Media	Danielle Porras				
		tion Number					
	VIOIE			Code 88 101 20(3)	116.115(b)(2)(F) and () and 122 1/3//) NSI	
		11410 0110(0)			SC No. 2, FOP No. 0232		
					& Safety Code § 382.08		
							i
			Failed to com	ply with the MAER.	Specifically, the Respond	dent exceeded the CO	
	Violatio	n Description			0.73 lb/hr to 7.70 lbs/h		S
			-	-	017 to August 23, 2017 Ig in 26.96 lbs of unauth	_	
				1027,71004	.g 20170 100 01 anaan	0.1204 00 0.11100.01101	
							=1
						Base Penalty	\$25,000
>> Env	ironme	ntal, Propei	rty and Hum	an Health Matri	x		
		Dalassa	NA-:	Harm			
OR		Release Actual	Major	Moderate Mine	וע		
OK		Potential			Perce	nt 15.0%	
>>Prog	gramma	tic Matrix					
		Falsification	Major	Moderate Mine		nt 0.00/	
					Perce	nt 0.0%	
		Human health	or the environn	nent has been expose	ed to insignificant amour	nts of pollutants that did	
	Matrix			•	Ith or environmental rec	•	
	Notes		-	violati	on.		
					0 -1:	#24.2F	-
					Adjustme	ent \$21,250	<u>)</u>
							\$3,750
Violatio	n Event	ts					
		Number of \	violation Events	1	Numb	er of violation days	
			daily				
			weekly				
			monthly				
			quarterly		1	iolation Base Penalty	y \$3,750
			semiannual	Х			
			annual				
			single event				
		One comian	nual avent is rea	ammandad for the in	stances of non-compliar	ass that assurred from	1
		One semian		February 23, 2017 to	•	ice that occurred from	
							4
Good Fa	aith Effo	orts to Com		25.0%		Reduction	\$937
			B Extraordinary	efore NOE/NOV NOE/NO	V to EDPRP/Settlement Offer		
			Ordinary	х			
			N/A	Λ			
				The Decree	monlated the second		
			Notes		mpleted the corrective n fior to the NOE dated Jur		
				J .,, p.			
						Violation Subtota	\$2,813
Fooner	aio Porc	fit (ED) f	thic violetic	n e	Ctat	story Limit Tost	
Econom	nc Bene	iii (EB) TOP	this violation) I	Stati	utory Limit Test	
		Estimate	ed EB Amount		\$248 Violati	on Final Penalty Tota	\$5,738
			ou == /ou	<u> </u>	violati	on i mai i charty rota	Ψ0,700

	E	conomic	Benefit	Wo	rksheet		
Respondent	INEOS USA LL	C (PCW No. 1 of	4)				
Case ID No.	60882						
Reg. Ent. Reference No.							
Media							Years of
Violation No.						Percent Interest	Depreciation
						5.0	15
	Item Cost	Date Required	Final Date	Yrs	Interest Saved	Costs Saved	EB Amount
Item Description							
1 to 2 cool .pc.							
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	23-Feb-2017	23-Aug-2017	0.50	\$248	n/a	\$248
Notes for DELAYED costs	Furnace, EPN	DDB-102A. The	Date Required i dat	s the fi e of cor	rst date of non-cor mpliance.	ourly MAER for the smpliance and the Fir	nal Date is the
Avoided Costs	ANNUA	ALIZE avoided c	osts before en	-		one-time avoide	d costs)
Disposal				0.00	\$0	\$0	\$0
Personnel				0.00	\$0	\$0	\$0
Inspection/Reporting/Sampling				0.00	\$0	\$0	\$0
Supplies/Equipment				0.00	\$0	\$0	\$0
Financial Assurance				0.00	\$0	\$0	\$0
ONE-TIME avoided costs				0.00	\$0	\$0	\$0
Other (as needed)				0.00	\$0	\$0	\$0
Notes for AVOIDED costs							
Approx. Cost of Compliance		\$10,000			TOTAL		\$248

		ening Date			Do	cket No.	2021-0818-AIR-E		PCW
		-	INEOS USA LLO	C (PCW No. 1	1 of 4)			Policy	Revision 4 (April 2014)
_		ase ID No.						PCW Re	evision March 26, 2014
Reg.	Ent. Ref		RN100238708						
	F f C	Media	Air Danielle Porras						
		ation Number		I					
	VIOI			0 1 66 46	24 00/0) 44/4	145(1)(0)(5)) () 1400 440 (A) NGD	
		Rule Cite(s)	30 Tex. Admin.	Code §§ 10)1.20(3), 116. (954M2, SC No.	115(b)(2)(F)) and (c), and 122.143(4 . O2327, GTC and STC N	4), NSR	
			Terriit NOS. 73		x. Health & Saf			NO. 20,	
						, 3			
			Failed to con	noly with the	MAFR Speci	fically, the F	Respondent exceeded th	e CO	
	\(':-1-4!-	D	MAFR of 7.03				32.69 lbs/hr for a total		
	violatio	n Description	hours on four o	days from Ma	arch 19, 2017	to August 18	8, 2017 for the Steam C	racking	
			Furnace, EP	N DDB-1020	C, resulting in 8	31.21 lbs of	unauthorized CO emissi	ons.	
							Rase F	Penalty	\$25,000
							Dasc I	charty	Ψ20,000
>> En	vironme	ntal, Propei	rty and Hum		h Matrix				
		Deleges	Maior	Harm	Minor				
OR		Release Actual	Major	Moderate	Minor				
OK		Potential			X		Percent 15.0%		
		rotential					13.070		
>>Pro	gramma	tic Matrix							
		Falsification	Major	Moderate	Minor	i			
							Percent 0.0%		
	Matrix				•	•	amounts of pollutants t		
	Notes	not exceed lev	eis that are pro	itective of nu	ıman neaitn or violation.	environmei	ntal receptors as a resul	t or the	
					violation.				
						Ad	justment	21,250	
						•			
									\$3,750
Violati	on Even	te							
Violati	OII EVCII								
		Number of \	/iolation Events	1		4	Number of violation day	ys	
							_		
			daily 						
			weekly		_				
			monthly quarterly				Violation Base F	Penalty	\$3,750
			semiannual	Х			Violation Base i	Charty	ψ0,700
			annual						
			single event						
		1							
		One semianı	nual event is red	commended	for the instance	ces of non-co	ompliance that occurred	from	
				March 19,	2017 to Augus	st 18, 2017.			
Good F	aith Effo	orts to Com	ply	25.0%	6		Re	duction	\$937
				Sefore NOE/NO\	V NOE/NOV to E	DPRP/Settleme	ent Offer		
			Extraordinary						
			Ordinary	Х					
			N/A						
				The Respo	ndent complet	ed the corre	ective measures on		
			Notes				ated June 24, 2019.		
							Violation Su	ubtotal	\$2,813
_								act	
Econor	mic Bene	efit (EB) for	this violation	on			Statutory Limit T	CSI	
Econor	mic Bene	, ,	this violation	on	\$208	,	Statutory Limit 1 Violation Final Penalt	_	\$5,738
Econor	mic Bene	, ,					_	y Total	\$5,738 \$5,738

	E	conomic	Benefit	Wo	rksheet		
Respondent	INEOS USA LL	.C (PCW No. 1 of	4)				
Case ID No.	60882						
Rea. Ent. Reference No.							
Media							Years of
Violation No.						Percent Interest	Depreciation
21012110111101						5.0	15
	Item Cost	Date Required	Final Date	Yrs	Interest Saved	Costs Saved	EB Amount
Item Description							
rtem bescription							
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	19-Mar-2017	18-Aug-2017	0.42	\$208	n/a	\$208
Notes for DELAYED costs	Furnace, EPN	DDB-102C. The	Date Required dat	is the fi e of cor	rst date of non-compliance.	ourly MAER for the S mpliance and the Fi	nal Date is the
Avoided Costs	ANNUA	ALIZE avoided c	osts before en	tering	item (except for	one-time avoide	d costs)
Disposal				0.00	\$0	\$0	\$0
Personnel				0.00	\$0	\$0	\$0
Inspection/Reporting/Sampling				0.00	\$0	\$0	\$0
Supplies/Equipment				0.00	\$0	\$0	\$0
Financial Assurance				0.00	\$0	\$0	\$0
ONE-TIME avoided costs				0.00	\$0	\$0	\$0
Other (as needed)				0.00	\$0	\$0	\$0
Notes for AVOIDED costs							
Approx. Cost of Compliance		\$10,000			TOTAL		\$208

		ening Date		Docket No. 2021-0818-AIR-E	PCW
		espondent ase ID No.			Revision 4 (April 2014) Revision March 26, 2014
Reg.			RN100238708	TOW	Kevision Waren 20, 2014
	E . C . O	Media			
		oordinator	Danielle Porras		
	VIOIC	Rule Cite(s)		Code §§ 122.143(4) and 122.145(2)(A), FOP No. O2327, GTC, and	1
			30 Tex. Admin.	Tex. Health & Safety Code § 382.085(b)	
					1
				all instances of deviations. Specifically, the deviation report for the	
	Violatio	n Description		through September 30, 2016 reporting period did not include the onducting a cylinder gas audit ("CGA") earlier than two months after	
				the previous CGA.	
					<u> </u>
				Base Penalty	\$25,000
>> Env	vironme	ntal, Prope	rty and Hum	an Health Matrix	
		Release	Major	Harm Moderate Minor	
OR		Actual			
		Potential		Percent 0.0%	
>>Pro	gramma	tic Matrix			
		Falsification	Major	Moderate Minor	
				x Percent 1.0%	
	Matrix				1
	Notes		Less tha	n 30% of the rule requirements were not met.	
					1
				Adjustment \$24,750	
					\$250
Violatio	on Event	te			
Violatio	on Even				
		Number of \	iolation Events	1 985 Number of violation days	
			daily		
			weekly		
			monthly quarterly	Violation Base Penalty	\$250
			semiannual		
			annual single event	x	
	,		single event	<u> </u>	=
				One single event is recommended.	
					_
Good F	aith Effo	orts to Com	ply	10.0% Reduction	\$25
			Be	efore NOE/NOV NOE/NOV to EDPRP/Settlement Offer	
			Extraordinary		
			Ordinary N/A	X	
			.,,,,	The Respondent completed the corrective measures by	
			Notes	September 30, 2020, after to the NOE dated June 24, 2019.	
			<u> </u>	2017.	
				Violation Subtota	\$225
Econor	nic Bene	efit (EB) for	this violation	on Statutory Limit Test	
		Estimate	ed EB Amount	\$6 Violation Final Penalty Tota	\$420
				This violation Final Assessed Penalty (adjusted for limits)	\$420
				(aujustou isi iiiiiis)	4.20

	Ed	conomic	Benefit	Woi	rksheet		
Respondent Case ID No. Reg. Ent. Reference No.	60882	C (PCW No. 1 of 4	1)				
Media Violation No.						Percent Interest	Years of Depreciation
						5.0	15
	Item Cost	Date Required	Final Date	Yrs	Interest Saved	Costs Saved	EB Amount
Item Description							
Delayed Costs							
Equipment				0.00	\$0	\$0	\$0
Buildings				0.00	\$0	\$0	\$0
Other (as needed)				0.00	\$0	\$0	\$0
Engineering/Construction				0.00	\$0	\$0	\$0
Land				0.00	\$0	n/a	\$0
Record Keeping System				0.00	\$0	n/a	\$0
Training/Sampling				0.00	\$0	n/a	\$0
Remediation/Disposal				0.00	\$0	n/a	\$0
Permit Costs	4050	00.0.1.0047	0/ 4 0017	0.00	\$0	n/a	\$0
Other (as needed)	\$250	30-Oct-2016	26-Apr-2017	0.49	\$6	n/a	\$6
Notes for DELAYED costs	reporting per CGA. The	iod to report the Date Required is	deviation for co the date the de	nductin eviation compli	g a CGA earlier the report was due ar ance.	16 through Septem an two months afte nd the Final Date is lementing measures	the previous the date of
		ensure that a	II instances of de	eviation	ns are reported in a	a timely manner.	
Avoided Costs	ANNUA	I I I TE avoided co	nsts hefore en	terina	item (except for	one-time avoide	d costs)
Disposal	7		1	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		\$250			TOTAL		\$6

S	Screening Date			Docket No. 2021-0818-AIR-	E	PCW
		INEOS USA LLC (P	CW No. 1 of 4)		Policy	Revision 4 (April 2014)
D 5-4	Case ID No.				PCW R	Pevision March 26, 2014
Reg. Ent.	Reference No. Media					
Fn	of. Coordinator					
	Violation Number					
	Rule Cite(s)	30 Tex Admin (20de 88 101 201(a)	(1)(B) and 122.143(4), FOP No.	02327 GTC	
				Health & Safety Code § 382.085		
Viol	lation Description	24 hours after the No. 270980 bega not discovered	e discovery of an em in on September 4, 20 until October 24, 20 70980 was due by 0	for a reportable emissions event hissions event. Specifically, altho 2017 at 9:55 a.m., Incident No. 17 at 9:55 a.m. so the initial not ctober 25, 2017 at 9:55 a.m., b ober 25, 2017 at 2:47 p.m.	ough Incident 270980 was cification for	
				1	Base Penalty	\$25,000
>> Environ	mental, Prope	rty and Humar	Health Matrix			
	_	_	Harm			
OR	Release Actual		Moderate Minor			
OR	Potential			Percent 0.0	0%	
	, otorria			3.0	370	
>>Program	nmatic Matrix					
	Falsification	Major N	Moderate Minor		201	
			Х	Percent 1.0	0%	
Mat Not		Less than 3	30% of the rule requ	lirements were not met.		
				Adjustment	\$24,750	
				Aujustment	Ψ24,730	
						\$250
Violation Ev	vents					
Violation E	vents					
	Number of \	/iolation Events	1	1 Number of violat	ion days	
		daily weekly				
		monthly				
		quarterly		Violation I	Base Penalty	\$250
		semiannual			•	
		annual				
		single event	X			
						•
		C	One single event is re	ecommended.		
Good Faith	Efforts to Com	ply	25.0%		Reduction	\$62
				to EDPRP/Settlement Offer	rtoddotion	•
		Extraordinary				
		Ordinary	Х			
		N/A				
		Notacil		pleted the corrective measures or for to the NOE dated July 13, 202		
		<u> </u>		Viola	tion Subtotal	\$188
Fconomic P	Benefit (EB) for	this violation		Statutory Li	mit Tast	
Legioniic B	chefft (LB) 101	ans violation			init i Cat	
	Estimate	ed EB Amount		\$0 Violation Final F	Penalty Total	\$383
				nal Assessed Penalty (adjuste		\$383

	E	conomic	Benefit	Wo	rksheet		
Respondent	INEOS USA LL	C (PCW No. 1 of	4)				
Case ID No.	60882						
Rea. Ent. Reference No.							
Media							Years of
Violation No.						Percent Interest	Depreciation
Violation No.	00					5.0	15
	Itam Cost	Data Damiirad	Final Data	Ves	Interest Coved	Costs Saved	
	I tem Cost	Date Required	Final Date	Yrs	Interest Saved	Costs Saved	EB Amount
Item Description							
Delayed Costs							
Equipment				0.00	\$0	\$0	\$0
Buildings				0.00	\$0	\$0	\$0
Other (as needed)				0.00	\$0	\$0	\$0
Engineering/Construction				0.00	\$0	\$0	\$0
Land				0.00	\$0	n/a	\$0
Record Keeping System				0.00	\$0	n/a	\$0
Training/Sampling				0.00	\$0	n/a	\$0
Remediation/Disposal				0.00	\$0	n/a	\$0
Permit Costs				0.00	\$0	n/a	\$0
Other (as needed)	\$250	25-Oct-2017	25-Oct-2017	0.00	\$0	n/a	\$0
Notes for DELAYED costs		initial notifica	tion was due an	d the F	inal Date is the da		
Avoided Costs	ANNUA	ALIZE avoided c	osts before er			one-time avoide	
Disposal				0.00	\$0	\$0	\$0
Personnel				0.00	\$0	\$0	\$0
Inspection/Reporting/Sampling				0.00	\$0	\$0	\$0
Supplies/Equipment				0.00	\$0	\$0	\$0
Financial Assurance				0.00	\$0	\$0	\$0
ONE-TIME avoided costs				0.00	\$0	\$0	\$0
Other (as needed)				0.00	\$0	\$0	\$0
Notes for AVOIDED costs							
Approx. Cost of Compliance		\$250			TOTAL		\$0

	Screening Date		Docket No. 2021-0818-AIR-E	PCW
	Respondent Case ID No.	INEOS USA LLC		Revision 4 (April 2014)
Reg.	Ent. Reference No.		PCW K	Pevision March 26, 2014
_	Media			
	Enf. Coordinator Violation Number			
	Rule Cite(s)		Code §§ 101.20(3), 116.115(c), and 122.143(4), NSR Permit Nos.	
		95 and PSDTX	854M2, SC No. 2, FOP No. 02327, GTC and STC No. 20, and Tex.	
			Health & Safety Code § 382.085(b)	
		Failed to preve	ent unauthorized emissions. Specifically, the Respondent released	
	Violation Description		VOC as fugitive emissions, during an emissions event (Incident No.	
		270980)	that began on September 4, 2017 and lasted 1,201 hours.	
			Base Penalty	\$25,000
>> Env	vironmental, Prope	rty and Huma		
	Release	Major	Harm Moderate Minor	
OR	Actual		X	
	Potential		Percent 15.0%	
>>Pro	grammatic Matrix		M. J. J. W.	
	Falsification	Major	Moderate Minor Percent 0.0%	
		1	<u> </u>	
	Matrix		ent has been exposed to insignificant amounts of pollutants that did ective of human health or environmental receptors as a result of the	
	Notes Notes	reis triat are prote	violation.	
			Adiustment #21.250	
			Adjustment \$21,250	
			l	\$3,750
Violati	on Events			
	Number of \	/iolation Events	1 Number of violation days	
		daily		
		weekly		
		monthly quarterly	X Violation Base Penalty	\$3,750
		semiannual		
		annual single event		
		C	One quarterly event is recommended.	
Good F	aith Efforts to Com	ply	25.0% Reduction	\$937
		Bef Extraordinary	ore NOE/NOV NOE/NOV to EDPRP/Settlement Offer	
		Ordinary	X	
		N/A		
			The Respondent completed the corrective measures by January 15, 2018, prior to the NOE dated July 13, 2020.	
			Violation Subtotal	\$2,813
Econor	mic Benefit (EB) for	this violation	n Statutory Limit Test	
	Estimat	ed EB Amount	\$27 Violation Final Penalty Total	\$5,738
			This violation Final Assessed Penalty (adjusted for limits)	\$5,738

	E	conomic	Benefit	Woi	rksheet		
Respondent	INEOS USA LL	C (PCW No. 1 of	4)				
Case ID No.	60882						
Reg. Ent. Reference No.	RN100238708						
Media							Years of
Violation No.						Percent Interest	Depreciation
Tiolation ito.						5.0	15
	Itom Cost	Date Required	Final Date	Yrs	Interest Saved	Costs Saved	EB Amount
Itaaa Baaaaiatiaa	rtem cost	Date Required	rillai Date	113	TitleTest Saveu	costs saveu	EB AIIIOUIT
Item Description							
Delayed Costs		1		1		· · · · · · · · · · · · · · · · · · ·	
Equipment				0.00	\$0	\$0	\$0
Buildings				0.00	\$0	\$0	\$0
Other (as needed)				0.00	\$0	\$0	\$0
Engineering/Construction				0.00	\$0	\$0	\$0
Land				0.00	\$0 \$0	n/a	\$0
Record Keeping System				0.00	\$0 \$0	n/a n/a	\$0 \$0
Training/Sampling Remediation/Disposal				0.00	\$0 \$0	n/a	\$0
Permit Costs				0.00	\$0 \$0	n/a	\$0
Other (as needed)	\$1,500	4-Sep-2017	15-Jan-2018	0.36	\$27	n/a	\$27
Notes for DELAYED costs	are closed a	after a startup act to the same or s	ivity has been d imilar causes as	complete Incider	ed in order to prev	g steps to ensure the vent the recurrence be Date Required is the of compliance.	of emissions
Avoided Costs	ANNUA	ALIZE avoided c	osts before er	tering	item (except for	one-time avoided	d costs)
Disposal				0.00	\$0	\$0	\$0
Personnel				0.00	\$0	\$0	\$0
Inspection/Reporting/Sampling				0.00	\$0	\$0	\$0
Supplies/Equipment				0.00	\$0	\$0	\$0
Financial Assurance				0.00	\$0	\$0	\$0
ONE-TIME avoided costs				0.00	\$0	\$0	\$0
Other (as needed)				0.00	\$0	\$0	\$0
Notes for AVOIDED costs							
Approx. Cost of Compliance		\$1,500			TOTAL		\$27

		ening Date			Docket No.	2021-0818-AIR-E		PCW
	R	espondent	INEOS USA LLO	C (PCW No. 1 of 4)			Policy	Revision 4 (April 2014)
_		ase ID No.					PCW R	Revision March 26, 2014
Reg. E	nt. Ref		RN100238708					
	F=f C	Media						
		tion Number	Danielle Porras	Ī				
	viola	Rule Cite(s)						
		Rule Cite(s)	30 TCX. Admin			1 122.143(4), NSR Peri		
			95 and PSD1		OP No. 02327, G fety Code § 382.	TC and STC No. 20, ar	na rex.	
				Health & Sa	nety code § 302.	003(b)		
			Failed to prev	vent unauthorized em	issions. Specifica	ally, the Respondent re	eleased	
	Violeties	- Decemination	32 724 77 lh			234.14 lbs of VOC as f		
	violatioi	n Description	emissions, d	-		o. 275491) that occurr	ed on	
				January 2, 2018 and	lasted 18 hours	and 15 minutes.		
						Base	Penalty	\$25,000
	•							
>> Envi	ronmer	ntal, Prope	rty and Hum	nan Health Matri Harm	X			
		Release	Major	Moderate Mind	or			
OR		Actual		Х				
		Potential				Percent 30.0%		
						. <u></u>		
>>Prog	ramma	tic Matrix						
	П	Falsification	Major	Moderate Mine	or	5		
	Į.					Percent 0.0%		
	Ī							
	Matrix		•		-	pondent, human healt		
	Notes		•	-	•	s which did not exceed		
		tnat are p	rotective of num	nan neaith or environ	mental receptors	as a result of the viola	ition.	
	E.							
					Ad	justment	\$17,500	
							Ī	\$7,500
							L	Ψ7,300
Violatio	n Event	s						
						ī		
		Number of \	/iolation Events	1	1	Number of violation d	ays	
			daily					
			weekly					
			monthly	Х				
			quarterly			Violation Base	Penalty	\$7,500
			semiannual					
			annual					
			single event					
	П							
				One monthly event	is recommended			
				One monthly event	is recommended.			
	Ц							
Good Fa	ith Effo	rts to Com		25.0%		R	eduction	\$1,875
			r	efore NOE/NOV NOE/NO	V to EDPRP/Settleme	ent Offer		
			Extraordinary					
			Ordinary	Х				
			N/A					
			Not	The Respondent co	mpleted the corre	ective measures on		
			Notes	October 1, 2020, pr	ior to the NOE da	ated May 14, 2021.		
			l					
						Violation 9	Subtotal	\$5,625
Foonors	io Don-	fi+ (ED) f	thic violeti	on		Statuton: Limit	Tost	
Econom	ic bene	iii (EB) ior	this violation			Statutory Limit	rest	
		Estimate	ed EB Amount	\$1	,374	Violation Final Pena	lty Total	\$11,475
				This violation I	Final Assessed I	Penalty (adjusted fo	r limits)	\$11,475

	E	conomic	Benefit	Wo	rksheet		
Respondent	INEOS USA LL	C (PCW No. 1 of	4)				
Case ID No.	60882						
Reg. Ent. Reference No.							
Media							Years of
Violation No.						Percent Interest	Depreciation
						5.0	15
	Item Cost	Date Required	Final Date	Yrs	Interest Saved	Costs Saved	EB Amount
Item Description							
Delayed Costs							
Equipment				0.00	\$0	\$0	\$0
Buildings				0.00	\$0	\$0	\$0
Other (as needed)				0.00	\$0	\$0	\$0
Engineering/Construction				0.00	\$0	\$0	\$0
Land				0.00	\$0	n/a	\$0
Record Keeping System				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	2-Jan-2018	1-Oct-2020	2.75	\$1,374	n/a	\$1,374
Notes for DELAYED costs	for the area	a electrical classifi ar causes as Incid	cations in order lent No. 275491	to prev	ent the recurrence	ure and install a new e of emissions event ne date the emission nce.	ts due to the
Avoided Costs	ANNUA	ALIZE avoided c	osts before er	tering	item (except for	one-time avoide	d costs)
Disposal				0.00	\$0	\$0	\$0
Personnel				0.00	\$0	\$0	\$0
Inspection/Reporting/Sampling				0.00	\$0	\$0	\$0
Supplies/Equipment				0.00	\$0	\$0	\$0
Financial Assurance				0.00	\$0	\$0	\$0
ONE-TIME avoided costs				0.00	\$0	\$0	\$0
Other (as needed)				0.00	\$0	\$0	\$0
Notes for AVOIDED costs							
Approx. Cost of Compliance		\$10,000			TOTAL		\$1,374



PAYABLE PENALTY

STATE OF MENTAL OF	Policy R	Pe evision 2 (Septembe	•	aiculatio	n works	neet (PC	•	vision October 30, 2008
DATES	Assigned	1-May-2017						
	PCW	6-Aug-2024	Screening	8-May-2017	EPA Due			
DECDO	NDENT/FACTIT	TY INFORMATI	ON					
KESPUI		INEOS USA LLC		of 4)				
Red	j. Ent. Ref. No.		(PCW NO. 2	JI 4)				
	y/Site Region				Major/	Minor Source	Major	
					<u> </u>			
	NFORMATION	50000						
En	f./Case ID No.	60882 2021-0818-AIR-	_		No.	of Violations Order Type		
Med	ia Program(s)		·E		Governmen	order Type nt/Non-Profit		
Hea	Multi-Media	All					Danielle Porras	;
					!		Enforcement T	
Adn	nin. Penalty \$ I	imit Minimum	\$0	Maximum	\$10,000			
			Penal	ty Calcula	tion Secti	ion		
TOTAL	BASE PENA	LTY (Sum of		-			Subtotal 1	\$112,500
				Dase penan	,			+ /
		/-) TO SUBT						
	Compliance His	tained by multiplying	g the Total Base	Penalty (Subtotal 1 78.0%) by the indicated Adjustment		tals 2, 3, & 7	\$87,750
	Compliance in						lais 2, 3, & 7	\$67,750
	Notes		imilar violation tion for one N	OVs with same ones, and three of lotice of Intentions of Violations of V	rders containin to conduct an a	ig a denial of		
	Culpability	No		0.0%	Enhancement		Subtotal 4	\$0
				_				
	Notes	The Re	espondent do	es not meet the	culpability crit	eria.		
	ļ							
	Good Faith Eff	ort to Comply T	otal Adjust	ments			Subtotal 5	-\$11,250
		• ′						· , ,
		<i>c</i>						
	Economic Bene	Total EB Amounts	\$0		Enhancement* d at the Total EB \$	Amount	Subtotal 6	\$0
	Estimated	Cost of Compliance	\$0 \$0	Саррс	a at the rotal LD p	, , iiiiodine		
SUM C	OF SUBTOTAL	LS 1-7				F	inal Subtotal	\$189,000
ATILE		C THETTER I	44V DE011	TD=				10
		AS JUSTICE N Subtotal by the indi			0.0%		Adjustment	\$0
Reduces 0	i emiances the i mai	Subtotal by the mar	cateu percentag	c.			1	
	Notes							
	<u>'</u>					Final Per	nalty Amount	\$189,000
STATU	JTORY LIMIT	T ADJUSTMEI	NT			Final Asse	ssed Penalty	\$189,000
DE===	ND A I				55.55			100 000
DEFER		nalty by the indicate	d percentage		20.0%	Reduction	Adjustment	-\$37,800
Neuules II	ne i mai Assessed Pe	nalty by the indicate	u percentage.				1	
	Notes		Deferral offe	ed for expedite	d settlement.			

\$151,200

Docket No. 2021-0818-AIR-E

Policy Revision 2 (September 2002) PCW Revision October 30, 2008

Respondent INEOS USA LLC (PCW No. 2 of 4)

Case ID No. 60882

Reg. Ent. Reference No. RN100238708

Media Air

Enf. Coordinator Danielle Porras

Compliance History Worksheet

Component	ory Site Enhancement (Subtotal 2) Number of	Number	Adjus
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>)	3	15%
	Other written NOVs	3	6%
	Any agreed final enforcement orders containing a denial of liability (number of orders meeting criteria)	3	60%
Orders	Any adjudicated final enforcement orders, agreed final enforcement orders without a denial of liability, or default orders of this state or the federal government, or any final prohibitory emergency orders issued by the commission	0	0%
Judgments	Any non-adjudicated final court judgments or consent decrees containing a denial of liability of this state or the federal government (number of judgments or consent decrees meeting criteria)	0	0%
and Consent Decrees	Any adjudicated final court judgments and default judgments, or non-adjudicated final court judgments or consent decrees without a denial of liability, of this state or the federal government	0	0%
Convictions	Any criminal convictions of this state or the federal government (number of counts)	0	0%
Emissions	Chronic excessive emissions events (number of events)	0	0%
Audits	Letters notifying the executive director of an intended audit conducted under the Texas Environmental, Health, and Safety Audit Privilege Act, 74th Legislature, 1995 (number of audits for which notices were submitted)	1	-1%
Audits	Disclosures of violations under the Texas Environmental, Health, and Safety Audit Privilege Act, 74th Legislature, 1995 (number of audits for which violations were disclosed)	1	-2%
	Environmental management systems in place for one year or more	No	0%
Other	Voluntary on-site compliance assessments conducted by the executive director under a special assistance program	No	0%
Circi	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 3)

>> Compliance History Person Classification (Subtotal 7)

Satisfactory Performer

Adjustment Percentage (Subtotal 7)

>> Compliance History Summary

Compliance **History Notes**

Enhancement for three NOVs with same or similar violations, three NOVs with dissimilar violations, and three orders containing a denial of liability. Reduction for one Notice of Intent to conduct an audit and one Disclosure of Violations.

Total Adjustment Percentage (Subtotals 2, 3, & 7)

Scr	eening Date	8-May-2017	Doc	ket No. 2021-0818-AIR-E	PCW
	•	INEOS USA LLC (PCW No. 1	2 of 4)	·	evision 2 (September 2002)
Reg. Ent. Re	Case ID No.			PCW	Revision October 30, 2008
Reg. Ent. Re	Media				
		Danielle Porras			
Vio	lation Number				-
	Rule Cite(s)	30 Tex. Admin. Code §§ 1	.22.121 and 122 §§ 382.054 an	2.210(a) and Tex. Health & Safety Code d 382.085(b)	
Violatio	on Description	emission units at the site. 29, 2005, the Respondent to add Emergency Gener	Specifically, af did not submit ator DM-177 tha	rating permit ("FOP") prior to operating ter FOP No. O2327 was revised on July an application to revise FOP No. O2327 at was constructed on or about April 1, his emission unit prior to obtaining ration.	
				Base Penal	\$10,000
>> Environme	ental, Prope	rty and Human Healt	h Matrix		
	Release	Harm Major Moderate	Minor		
OR	Actual				
	Potential			Percent 0%	
>>Programma	atic Matrix				
	Falsification	Major Moderate	Minor		
		Х		Percent 25%	
Matrix Notes		100% of the ru	le requirements	were not met.	
				Adjustment \$7,5	00
				¥-7-	
					\$2,500
Violation Ever	its				
	Number of '	Violation Events 45		4055 Number of violation days	
		daily			
		weekly monthly			
		quarterly x		Violation Base Penal	ty \$112,500
		semiannual			
		annual single event			
					
	Forty-five qua		nded from the A 2017 screening	pril 1, 2006 non-compliance date to the date.	
Good Faith Eff	orts to Com			Reduction	on \$11,250
		Before NO Extraordinary	V NOV to EDPRP/S	Settlement Offer	
		Ordinary	×		
		N/A			
		· ·	27, 2017, after	the corrective measures by the Notice of Enforcement ril 28, 2017.	
		<u> </u>	-	Violation Subtot	al \$101,250
Economic Ben	efit (EB) for	this violation		Statutory Limit Test	
		ed EB Amount	\$0	Violation Final Penalty Tot	al \$189,000
	Latimat	·		-	
1		i nis vi	JIALION FINALA	ssessed Penalty (adjusted for limit	s) \$189,000

	E	conomic	Benefit	Wo	rksheet		
Respondent	INEOS USA LL	C (PCW No. 2 of 4	1)				
Case ID No.	60882						
Reg. Ent. Reference No.	RN100238708						
Media						Percent Interest	Years of
Violation No.	1					reiteilt Interest	Depreciation
						5.0	15
	Item Cost	Date Required	Final Date	Yrs	Interest Saved	Costs Saved	EB Amount
Item Description							
Delayed Costs							
Equipment				0.00	\$0	\$0	\$0
Buildings				0.00	\$0	\$0	\$0
Other (as needed)				0.00	\$0	\$0	\$0
Engineering/Construction				0.00	\$0	\$0	\$0
Land				0.00	\$0	n/a	\$0
Record Keeping System				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)				0.00	\$0	n/a	\$0
Notes for DELAYED costs		See the I	Economic Benef	it in Vio	lation No. 2 in PCV	V No. 1 of 2.	
Avoided Costs	ANNU	ALIZE avoided c	osts before er	tering	item (except for	one-time avoide	d costs)
Disposal				0.00	\$0	\$0	\$0
Personnel				0.00	\$0	\$0	\$0
Inspection/Reporting/Sampling				0.00	\$0	\$0	\$0
Supplies/Equipment				0.00	\$0	\$0	\$0
Financial Assurance				0.00	\$0	\$0	\$0
ONE-TIME avoided costs				0.00	\$0	\$0	\$0
Other (as needed)				0.00	\$0	\$0	\$0
Notes for AVOIDED costs							
Approx. Cost of Compliance		\$0			TOTAL		\$0



Penalty Calculation Worksheet (PCW)

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

Assigned 31-Aug-2020 PCW 16-Oct-2024 **DATES**

Screening 8-Sep-2020 **EPA Due** 22-Feb-2021

RESPONDENT/FACILI	TY INFORMATION		
Respondent	INEOS USA LLC (PCW No. 3 of 4)		
Reg. Ent. Ref. No.	RN100238708		
Facility/Site Region	12-Houston	Major/Minor Source Major	

CASE INFORMATION			
Enf./Case ID No.	60882	No. of Violations	32
Docket No.	2021-0818-AIR-E	Order Type	1660
Media Program(s)	Air	Government/Non-Profit	No
Multi-Media		Enf. Coordinator	Danielle Porras
		EC's Team	Enforcement Team 2
Admin. Penalty \$	Limit Minimum \$0 Maximum	\$25,000	

Au	Time I clidicy &	Liniic I-iiiiiiiiiiiiiiiiiiiiiiiiiiiiiiiiii	μ φο I-lux	uii	Ψ23,000			
			Penalty C	Calcula	tion Section	on		
TOTA	L BASE PENA	ALTY (Sum of	violation base	e penal	ties)		Subtotal 1	\$297,000
ADJU	STMENTS (+ Subtotals 2-7 are o	/-) TO SUBT	OTAL 1 g the Total Base Penalty	y (Subtotal 1) by the indicated p	ercentage.		
	Compliance Hi	istory		78.0%	Adjustment	Subto	tals 2, 3, & 7	\$231,660
	Notes	with dissimi	or three NOVs with lar violations, and tion for one Notice Disclosure	three orde of Intent	ers containing a to conduct an a	denial of		
	Culpability	No		0.0%	Enhancement		Subtotal 4	\$0
	Notes	The Re	espondent does not	meet the	culpability crite	ria.		
	Good Faith Eff	ort to Comply	Total Adjustments	S			Subtotal 5	-\$44,284
	Economic Ben				Enhancement*		Subtotal 6	\$22,426
	Estimated	Total EB Amounts d Cost of Compliance		*Cappe	d at the Total EB \$ A	Amount		
SUM (OF SUBTOTA	LS 1-7				F	inal Subtotal	\$506,802
OTHE	D EACTORS	AS IUSTICE I	MAY DECLITE		0.00/		A -12	\$0
		Subtotal by the indi	MAY REQUIRE cated percentage.		0.0%		Adjustment	90
	Notes							
						Final Per	nalty Amount	\$506,802
STAT	UTORY LIMI	T ADJUSTME	NT			Final Asse	ssed Penalty	\$506,802
DEFE					20.0%	Reduction	Adjustment	-\$101,360
Reduces	the Final Assessed Pe	enalty by the indicate	d percentage.				1	
	Notes		Deferral offered for	expedite	d settlement.			
ΡΔΥΛ	BLE PENALT	v						\$405,442
								¥ 100/112

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

Respondent INEOS USA LLC (PCW No. 3 of 4)

Case ID No. 60882

Reg. Ent. Reference No. RN100238708

Media Air

Enf. Coordinator Danielle Porras

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

Component	Number of	Number	Adjust.
NOVs	Written notices of violation ("NOVs") with same or similar violations as those in the current enforcement action (<i>number of NOVs meeting criteria</i>)	3	15%
	Other written NOVs	3	6%
	Any agreed final enforcement orders containing a denial of liability (<i>number of orders meeting criteria</i>)	3	60%
Orders	Any adjudicated final enforcement orders, agreed final enforcement orders without a denial of liability, or default orders of this state or the federal government, or any final prohibitory emergency orders issued by the commission		0%
Judgments	Any non-adjudicated final court judgments or consent decrees containing a denial of liability of this state or the federal government (number of judgments or consent decrees meeting criteria)	0	0%
and Consent Decrees	Any adjudicated final court judgments and default judgments, or non-adjudicated final court judgments or consent decrees without a denial of liability, of this state or the federal government		0%
Convictions	Any criminal convictions of this state or the federal government (number of counts)	0	0%
Emissions	Chronic excessive emissions events (number of events)	0	0%

Letters notifying the executive director of an intended audit conducted under the Texas Environmental, Health, and Safety Audit Privilege Act, 74th Legislature,

Disclosures of violations under the Texas Environmental, Health, and Safety Audit Privilege Act, 74th Legislature, 1995 (number of audits for which violations were

1995 (number of audits for which notices were submitted)

	Environmental management systems in place for one year or more	No	0%
Other	Voluntary on-site compliance assessments conducted by the executive director under a special assistance program	No	0%
2 3 1 1 2 1	Participation in a voluntary pollution reduction program	No	0%
	Early compliance with, or offer of a product that meets future state or federal government environmental requirements	No	0%

Adjustment Percentage (Subtotal 2)

1

1

-1%

-2%

>> Repeat Violator (Subtotal 3)

Audits

No

Adjustment Percentage (Subtotal 3)

>> Compliance History Person Classification (Subtotal 7)

disclosed)

Satisfactory Performer

Adjustment Percentage (Subtotal 7)

>> Compliance History Summary

Compliance History Notes

Enhancement for three NOVs with same or similar violations, three NOVs with dissimilar violations, and three orders containing a denial of liability. Reduction for one Notice of Intent to conduct an audit and one Disclosure of Violations.

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

>> Final Compliance History Adjustment

Final Adjustment Percentage *capped at 100%

78%

	E	conomic	Benefit	Wo	rksheet		
Respondent	INEOS USA LL	C (PCW No. 3 of	1)				
Case ID No.	60882						
Reg. Ent. Reference No.							
Media						Percent Interest	Years of
Violation No.	1						Depreciation
						5.0	15
	Item Cost	Date Required	Final Date	Yrs	Interest Saved	Costs Saved	EB Amount
Item Description							
Delayed Costs				_			
Equipment				0.00	\$0	\$0	\$0
Buildings				0.00	\$0	\$0	\$0
Other (as needed)				0.00	\$0	\$0	\$0
Engineering/Construction				0.00	\$0	\$0 /-	\$0
Land Record Keeping System				0.00	\$0 \$0	n/a n/a	\$0 \$0
Training/Sampling				0.00	\$0	n/a	\$0
Remediation/Disposal				0.00	\$0	n/a	\$0
Permit Costs				0.00	\$0	n/a	\$0
Other (as needed)	\$10,000	1-Aug-2018	14-Apr-2022	3.70	\$1,852	n/a	\$1,852
Notes for DELAYED costs	1 Olefins Fla	ire in order to ma	intain the net h	eating v	value of the gas be non-compliance an	ase the natural gas ing combusted at 3 d the Final Date is t	00 Btu/scf or
Avoided Costs	ANNUA	ALIZE avoided c	osts before en	tering	item (except for	one-time avoide	d costs)
Disposal				0.00	\$0	\$0	\$0
Personnel				0.00	\$0	\$0	\$0
Inspection/Reporting/Sampling				0.00	\$0	\$0	\$0
Supplies/Equipment				0.00	\$0	\$0	\$0
Financial Assurance				0.00	\$0	\$0	\$0
ONE-TIME avoided costs				0.00	\$0 \$0	\$0 \$0	\$0 \$0
Other (as needed) Notes for AVOIDED costs		1		0.00	30	∌U I	30
Approx. Cost of Compliance		\$10,000			TOTAL		\$1,852

	E	conomic	Benefit	Wo	rksheet		
Respondent	INEOS USA LL	C (PCW No. 3 of	4)				
Case ID No.	60882						
Reg. Ent. Reference No.	RN100238708						
Media							Years of
Violation No.						Percent Interest	Depreciation
Violation No.	_					5.0	15
	Th 6	Data Damiliand	Fire I Bata		T		
	Item Cost	Date Required	Final Date	Yrs	Interest Saved	Costs Saved	EB Amount
Item Description							
Delayed Costs				1			
Equipment				0.00	\$0	\$0	\$0
Buildings				0.00	\$0	\$0	\$0
Other (as needed)				0.00	\$0	\$0	\$0
Engineering/Construction				0.00	\$0	\$0	\$0
Land				0.00	\$0 \$0	n/a n/a	\$0 \$0
Record Keeping System 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)	\$20,000	2-Jun-2018	19-Sep-2019	1.30	\$1,299	n/a	\$1,299
,							
						pressure to increas	
Notes for DELAYED costs	•	•	•		•	o operate the No. 2	
Notes for DELATED Costs	with no visible	e emissions. The				mpliance and the Fi	nal Date is the
			dat	e of cor	mpliance.		
Avoided Costs	ANNUA	ALIZE avoided c	osts before er			one-time avoide	
Disposal				0.00	\$0 \$0	\$0 \$0	\$0 \$0
Personnel				0.00	\$0 \$0	\$0 \$0	\$0 \$0
Inspection/Reporting/Sampling Supplies/Equipment				0.00	\$0	\$0 \$0	\$0
Financial Assurance				0.00	\$0	\$0 \$0	\$0
ONE-TIME avoided costs				0.00	\$0	\$0	\$0
Other (as needed)				0.00	\$0	\$0	\$0
,							7.5
Notes for AVOIDED costs							
Į.							
Ammune Coat of Committees		#20.000			TOTAL		¢1 200
Approx. Cost of Compliance		\$20,000			TOTAL		\$1,299

	E	conomic	Benefit	Woı	rksheet		
Respondent		C (PCW No. 3 of	4)				
Case ID No.							
Reg. Ent. Reference No.							
Media						Percent Interest	Years of
Violation No.	3						Depreciation
						5.0	15
	Item Cost	Date Required	Final Date	Yrs	Interest Saved	Costs Saved	EB Amount
Item Description							
Delayed Costs		i -					
Equipment				0.00	\$0	\$0	\$0
Buildings Other (as needed)				0.00	\$0 \$0	\$0 \$0	\$0 \$0
Engineering/Construction				0.00	\$0	\$0 \$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)	\$20,000	29-Sep-2018	19-Sep-2019	0.97	\$973	n/a	\$973
Notes for DELAYED costs	the flare, re	start the boilers,	and repair the e Date Required	lectrica s the fi	l system in order t	pressure to increas o operate the No. 1 mpliance and the Fi	Olefins Flare
Avoided Costs	ANNUA	LIZE avoided c	osts before en	tering	item (except for	one-time avoide	d costs)
Disposal				0.00	\$0	\$0	\$0
Personnel				0.00	\$0	\$0	\$0
Inspection/Reporting/Sampling				0.00	\$0	\$0	\$0
Supplies/Equipment				0.00	\$0	\$0	\$0
Financial Assurance ONE-TIME avoided costs				0.00	\$0 \$ 0	\$0 \$ 0	\$0 \$ 0
Other (as needed)				0.00	\$0	\$0 \$0	\$0
Notes for AVOIDED costs]		0.00	J	3 0	\$0
Approx. Cost of Compliance		\$20,000			TOTAL		\$973

		ening Date			t No. 2021-0818-AIR-E	PCW
				C (PCW No. 3 of 4)	Pol	licy Revision 4 (April 2014)
D		ase ID No.			PCI	W Revision March 26, 2014
Reg.	Ent. Ker	erence No. Media	RN100238708			
	Enf. C		Danielle Porras			
		ation Number				
		Rule Cite(s)	30 Tex. Admir	n. Code §§ 101.20(2) and 122.	143(4), 40 CFR § 61.354(a)(2), FOP	
					Health & Safety Code § 382.085(b)	
			Failed to cont	inuously monitor and record a r	are cose narameter for the treatment	
					process parameter for the treatment . Specifically, the benzene analyzers	
	Violatio	n Description	did not cont	inuously monitor the Aromatic \	Waste Minimization Project stripper	
				ne Benzene Treatment Process 2 on seven days from October 11	2 Unit for a total of 95 hours and 37	
			minutes	on seven days from October 11	1, 2017 to November 30, 2017.	
					Base Penali	\$25,000
					Dase Pellali	.y \$23,000
>> En	vironme	ntal, Prope	rty and Hum	an Health Matrix		
		Release	Major	Harm Moderate Minor		
OR		Actual		Tioderate Timor		
		Potential		X	Percent 7.0%	
B		11 - M - 1 - 1 - 1				
>>Pro	gramma	tic Matrix Falsification	Major	Moderate Minor		
		T districation	riajor	Troderate Trinior	Percent 0.0%	
		,				
	Matrix			•	to insignificant amounts of pollutants	
	Notes	that would no	ot exceed levels	that are protective of human he result of the violation.	ealth or environmental receptors as a	a
				result of the violation.		
					Adjustment \$23,25	50
						+4 750
						\$1,750
Violati	on Event	ts				
		Number of \	Violation Events	1	Number of violation days	
			daily			
			weekly			
			monthly			===
			quarterly		Violation Base Penal	xy \$1,750
			semiannual annual			
			single event	X		
						_
		One single e	vent is recomme	ended (one event for the instan	ces of non-compliance that occurred	
			from	October 11, 2017 to Novembe	r 30, 2017).	
			-			
Good F	aith Effe	orts to Com		25.0%	Reductio	n \$437
			B Extraordinary	efore NOE/NOV NOE/NOV to EDPRP/S	Settlement Offer	
			Ordinary	X		
			N/A			
				The Respondent completed th	e corrective measures on	
			Notes	November 30, 2017, prior to t	9	
				2020		
					Violation Subtot	al \$1,313
_		a				1 7:23
Econor	mic Bene	efit (EB) for	this violation	on	Statutory Limit Test	
		Estimate	ed EB Amount	\$68	Violation Final Penalty Total	al \$3,379
		Estimate	ed EB Amount	·	Violation Final Penalty Totalssed Penalty (adjusted for limits	

	Ec	conomic	Benefit	Wo	rksheet		
Respondent	INEOS USA LL	C (PCW No. 3 of	4)				
Case ID No.	60882						
Reg. Ent. Reference No.							
Media							Years of
Violation No.						Percent Interest	Depreciation
Violation No.	•					5.0	
							15
	Item Cost	Date Required	Final Date	Yrs	Interest Saved	Costs Saved	EB Amount
Item Description							
Delayed Costs				_			
Equipment				0.00	\$0	\$0	\$0
Buildings				0.00	\$0	\$0	\$0
Other (as needed)				0.00	\$0	\$0	\$0
Engineering/Construction				0.00	\$0	\$0	\$0
Land				0.00	\$0	n/a	\$0
Record Keeping System				0.00	\$0	n/a	\$0
Training/Sampling				0.00	\$0	n/a	\$0
Remediation/Disposal				0.00	\$0	n/a	\$0
Permit Costs				0.00	\$0	n/a	\$0
Other (as needed)	\$10,000	11-Oct-2017	30-Nov-2017	0.14	\$68	n/a	\$68
	Estimated	cost to ro-ostabli	ch communicati	on in th	o distributivo cont	rol system historian	so that the
						•	
Notes for DELAYED costs						ntinuously monitor	
						eatment Process 2	
	Requi	irea is the first da	ite of non-comp	iiance a	and the Final Date	is the date of comp	liance.
Avoided Costs	ANNUA	LIZE avoided c	osts before en			one-time avoide	
Disposal				0.00	\$0	\$0	\$0
Personnel				0.00	\$0	\$0	\$0
Inspection/Reporting/Sampling				0.00	\$0 \$0	\$0 \$0	\$0
Supplies/Equipment Financial Assurance				0.00	\$0	\$0 \$0	\$0 \$0
ONE-TIME avoided costs				0.00	\$0	\$0 \$0	\$0 \$0
Other (as needed)				0.00	\$0	\$0 \$0	\$0
Other (as needed)				0.00	3 0	Φ0	\$ 0
Notes for AVOIDED costs							
Approx. Cost of Compliance		\$10,000			TOTAL		\$68

	E	conomic	Benefit	Wo	rksheet		
Respondent	INEOS USA LL	.C (PCW No. 3 of	4)				
Case ID No.							
Reg. Ent. Reference No.	RN100238708						
Media						Percent Interest	Years of
Violation No.	5					. c. cone mice coe	Depreciation
						5.0	15
	Item Cost	Date Required	Final Date	Yrs	Interest Saved	Costs Saved	EB Amount
Item Description							
Delayed Costs							
Equipment				0.00	\$0	\$0	\$0
Buildings				0.00	\$0	\$0	\$0
Other (as needed)				0.00	\$0	\$0	\$0
Engineering/Construction				0.00	\$0	\$0	\$0
Land				0.00	\$0	n/a	\$0
Record Keeping System				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	5-Oct-2018	26-Sep-2022	3.98	\$1,989	n/a	\$1,989
Notes for DELAYED costs	The Date	Required is the fi	rst date of non-	complia	nce and the Final [Boiler, EPN DB-901A Date is the date of c	ompliance.
Avoided Costs	ANNU	ALIZE avoided c	osts before er	tering	item (except for	one-time avoide	d costs)
Disposal				0.00	\$0	\$0	\$0
Personnel				0.00	\$0	\$0	\$0
Inspection/Reporting/Sampling				0.00	\$0	\$0	\$0
Supplies/Equipment				0.00	\$0	\$0	\$0
Financial Assurance				0.00	\$0	\$0	\$0
ONE-TIME avoided costs				0.00	\$0	\$0	\$0
Other (as needed)				0.00	\$0	\$0	\$0
Notes for AVOIDED costs							
Approx. Cost of Compliance		\$10,000			TOTAL		\$1,989

	E	conomic	Benefit	Woı	rksheet		
Respondent	INEOS USA LL	C (PCW No. 3 of	4)				
Case ID No.	60882						
Reg. Ent. Reference No.	RN100238708						
Media	Air					Percent Interest	Years of
Violation No.	6					reicent interest	Depreciation
						5.0	15
	Item Cost	Date Required	Final Date	Yrs	Interest Saved	Costs Saved	EB Amount
Item Description		•					
Delayed Costs				_			
Equipment				0.00	\$0	\$0	\$0
Buildings				0.00	\$0	\$0	\$0
Other (as needed)				0.00	\$0	\$0	\$0
Engineering/Construction				0.00	\$0	\$0	\$0
Land				0.00	\$0	n/a	\$0
Record Keeping System Training/Sampling				0.00	\$0 \$0	n/a n/a	\$0 \$0
Remediation/Disposal				0.00	\$0	n/a	\$0
Permit Costs				0.00	\$0	n/a	\$0
Other (as needed)	\$750	22-Mar-2018	14-Dec-2020	2.73	\$103	n/a	\$103
Notes for DELAYED costs	December 10,	2017 to March 8 28, 2018 (\$250/f	, 2018, from Ap inal record). Th	ril 16, 2 e Date	2018 to April 20, 2	sions events that or 018, and from Nove Ite the first final rec mpliance.	ember 14, 2018
Avoided Costs	ANNUA	LIZE avoided c	osts before en	tering	item (except for	one-time avoide	d costs)
Disposal				0.00	\$0	\$0	\$0
Personnel				0.00	\$0	\$0	\$0
Inspection/Reporting/Sampling				0.00	\$0	\$0	\$0
Supplies/Equipment				0.00	\$0	\$0	\$0
Financial Assurance ONE-TIME avoided costs				0.00	\$0 \$0	\$0 \$0	\$0 \$0
Other (as needed)				0.00	\$0	\$0 \$0	\$0
Notes for AVOIDED costs				0.00	, <u>v</u>	Ψ0	30
Approx. Cost of Compliance		\$750			TOTAL		\$103

	Scre	ening Date	8-Sep-2020	Docket No. 2021-0818-AIR-E	PCW
		-		(PCW No. 3 of 4)	olicy Revision 4 (April 2014)
_		ase ID No.		PC	W Revision March 26, 2014
Reg.	Ent. Ref		RN100238708		
		Media			
			Danielle Porras		
	Viola	ation Number	/		_
		Rule Cite(s)	30 Tex. Admin.	. Code §§ 122.143(4) and 122.145(2)(A), FOP No. O2327, GTC, a	ı <mark>d</mark>
				Tex. Health & Safety Code § 382.085(b)	
			Eailed to report	t all instances of deviations. Specifically, the deviation report for the	
			October 1 3	2017 through March 31, 2018 reporting period did not include the	ie i
	Violatio	n Description		ailing to create the final record for a non-reportable emissions ever	ıt
			no la	ater than two weeks after the end of the emissions event.	
				Base Pena	ty \$25,000
>> Fn:	vironme	ntal Prone	rty and Hum	an Health Matrix	
L.		_	cy and main	Harm	
		Release	Major	Moderate Minor	
OR		Actual			
		Potential		Percent 0.0%	
>>Pro	gramma	tic Matrix			
,,,,,	gramma	Falsification	Major	Moderate Minor	
				X Percent 1.0%	
	Matrix				
	Notes		Less tha	n 30% of the rule requirements were not met.	
				Adjustment \$24,7	50
				rajastinene _{42.1/1}	30
					\$250
Violati	on Even	te			
Violati	OII LVEII	LS			
		Number of \	/iolation Events	1 862 Number of violation days	
			F		
			daily		
			weekly monthly		
			quarterly	Violation Base Pena	ty \$250
			semiannual	Violation Base i cha	Ψ230
			annual		
			single event	X	
					_
				One single event is recommended	
				One single event is recommended.	
Good F	Faith Eff	orts to Com		10.0% Reducti	on \$25
			Extraordinary	efore NOE/NOV NOE/NOV to EDPRP/Settlement Offer	
			· · · · · · · · · · · · · · · · · · ·	x	
			Ordinary N/A	X	
			N/A		
			Notes	The Respondent completed the corrective measures by	
			13325	February 4, 2021, after the NOE dated August 26, 2020.	
			<u> </u>		*225
				Violation Subto	tal \$225
Econor	mic Bene	efit (EB) for	this violation	on Statutory Limit Test	
		Estimate	ed EB Amount	\$35 Violation Final Penalty To	tal \$1,121
				•	
				This violation Final Assessed Penalty (adjusted for limit	s) \$1,121

	Ec	conomic	Benefit	Woı	rksheet				
		C (PCW No. 3 of 4	·)						
Case ID No.									
Reg. Ent. Reference No.									
Media						Percent Interest	Years of		
Violation No.	7						Depreciation		
						5.0	15		
	Item Cost	Date Required	Final Date	Yrs	Interest Saved	Costs Saved	EB Amount		
Item Description									
Delayed Costs									
Equipment				0.00	\$0	\$0	\$0		
Buildings				0.00	\$0	\$0	\$0		
Other (as needed)				0.00	\$0	\$0	\$0		
Engineering/Construction Land				0.00	\$0 \$0	\$0	\$0 \$0		
Land Record Keeping System				0.00	\$0 \$0	n/a 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)	\$250	30-Apr-2018	4-Feb-2021	2.77	\$35	n/a	\$35		
Notes for DELAYED costs	reporting pemissions events of the Eco	Estimated cost to submit a revised deviation report for the October 1, 2017 through March 31, 2018 reporting period to report the deviation for the failing to create the final record for a non-reportable emissions event no later than two weeks after the end of the emissions event. The Date Required is the date the deviation report was due and the Final Date is the date of compliance. See the Economic Benefit in Violation No. 3 of PCW No. 1 of 4 for implementing measures designed to ensure that all instances of deviations are reported in a timely manner.							
Avoided Costs	ANNUA	LIZE avoided co	osts before er	tering		one-time avoide	d costs)		
Disposal				0.00	\$0	\$0	\$0		
Personnel				0.00	\$0	\$0	\$0		
Inspection/Reporting/Sampling				0.00	\$0 \$0	\$0 \$0	\$0 \$0		
Supplies/Equipment Financial Assurance				0.00	\$0 \$0	\$0 \$0	\$0 \$0		
ONE-TIME avoided costs				0.00	\$0	\$0 \$0	\$0 \$0		
Other (as needed)				0.00	\$0	\$0 \$0	\$0		
other (as necaca)				0.00	Ψ0	Ψ0 Ι	Ψ0		
Notes for AVOIDED costs									
Approx. Cost of Compliance		\$250			TOTAL		\$35		

	Scre	ening Date	8-Sep-2020	Docket No. 2021-0818-AIR-E	PCW
		•			y Revision 4 (April 2014)
Dan		ase ID No.		PCW	Revision March 26, 2014
Reg.	ent. Kei	Media	RN100238708		
	Enf. C		Danielle Porras		
		ation Number			
		Rule Cite(s)	20 Toy Admin	Code §§ 122.143(4) and 122.145(2)(A), FOP No. O2327, GTC, and	1
			30 Tex. Admin.	Tex. Health & Safety Code § 382.085(b)	
				1000 (1000)	
			Failed to report	all instances of deviations. Specifically, the deviation report for the	
	Violatio	n Description		through September 30, 2018 reporting period did not include the	
			deviation for fa	ailing to create the final record for a non-reportable emissions event ater than two weeks after the end of the emissions event.	
			110 16	ater than two weeks after the end of the emissions event.	
					+25,000
				Base Penalty	\$25,000
>> En	vironme	ntal, Prope	rty and Hum	an Health Matrix	
		Dalasas	Maiau	Harm Madausta Minau	
OR		Release Actual	Major	Moderate Minor	
		Potential		Percent 0.0%	
>>Pro	gramma	tic Matrix			
		Falsification	Major	Moderate Minor	
				x Percent 1.0%	
					1
	Matrix		Less tha	n 30% of the rule requirements were not met.	
	Notes		Ecoo tria	in 50 % of the rule requirements were not met.	
					4
				Adjustment \$24,750	
					\$250
					Ψ230
Violati	on Even	ts			
		Number of V	lialation Events	1 C70 Number of violation days	
		Number of V	/iolation Events	1 679 Number of violation days	
			daily		
			weekly		
			monthly		
			quarterly 	Violation Base Penalty	\$250
			semiannual annual		
			single event	X	
		ı	9.0 0	<u> </u>	
				One single event is recommended.	
					4
Good I	Faith Effo	orts to Com		10.0% Reduction	\$25
			To the state of th	efore NOE/NOV NOE/NOV to EDPRP/Settlement Offer	
			Extraordinary		
			Ordinary	X	
			N/A		
			Notes	The Respondent completed the corrective measures by	
			Notes	February 4, 2021, after the NOE dated August 26, 2020.	
			<u>L</u>		
				Violation Subtotal	\$225
Econo	mic Bene	efit (EB) for	this violation	on Statutory Limit Test	
			_		¢1 121
		Estimate	ed EB Amount	\$28 Violation Final Penalty Total	\$1,121
				This violation Final Assessed Penalty (adjusted for limits)	\$1,121

	Ec	conomic	Benefit	Woı	rksheet				
		C (PCW No. 3 of 4	·)						
Case ID No.									
Reg. Ent. Reference No.									
Media						Percent Interest	Years of		
Violation No.	8						Depreciation		
						5.0	15		
	Item Cost	Date Required	Final Date	Yrs	Interest Saved	Costs Saved	EB Amount		
Item Description									
Delayed Costs		1		1					
Equipment				0.00	\$0	\$0	\$0		
Buildings				0.00	\$0	\$0	\$0		
Other (as needed)				0.00	\$0	\$0	\$0		
Engineering/Construction				0.00	\$0	\$0	\$0		
Land				0.00	\$0 \$0	n/a	\$0		
Record Keeping System Training/Sampling				0.00	\$0 \$0	n/a n/a	\$0 \$0		
Remediation/Disposal				0.00	\$0	n/a	\$0		
Permit Costs				0.00	\$0	n/a	\$0		
Other (as needed)	\$250	30-Oct-2018	4-Feb-2021	2.27	\$28	n/a	\$28		
Notes for DELAYED costs	reporting pemissions ev	Estimated cost to submit a revised deviation report for the April 1, 2018 through September 30, 2018 reporting period to report the deviation for the failing to create the final record for a non-reportable emissions event no later than two weeks after the end of the emissions event. The Date Required is the date the deviation report was due and the Final Date is the date of compliance. See the Economic Benefit in Violation No. 3 of PCW No. 1 of 4 for implementing measures designed to ensure that all instances of deviations are reported in a timely manner.							
Avoided Costs	ANNUA	LIZE avoided co	osts before er	tering	item (except for	one-time avoide	d costs)		
Disposal				0.00	\$0	\$0	\$0		
Personnel				0.00	\$0	\$0	\$0		
Inspection/Reporting/Sampling				0.00	\$0	\$0	\$0		
Supplies/Equipment				0.00	\$0	\$0	\$0		
Financial Assurance				0.00	\$0	\$0	\$0		
ONE-TIME avoided costs				0.00	\$0	\$0	\$0		
Other (as needed)				0.00	\$0	\$0	\$0		
Notes for AVOIDED costs									
Approx. Cost of Compliance		\$250			TOTAL		\$28		

	Scre	ening Date	8-Sep-2020	Docket No. 2021-0818-AIR-E	PCW
		-			cy Revision 4 (April 2014)
Dag		Case ID No.		PCW	Revision March 26, 2014
Reg.	ent. Kei	erence No. Media			
	Fnf. C		Danielle Porras		
		ation Number			
		Rule Cite(s)	30 Toy Admin	Code §§ 122.143(4) and 122.145(2)(A), FOP No. O2327, GTC, and	
			JO TEX. Admini	Tex. Health & Safety Code § 382.085(b)	
			·	all instances of deviations. Specifically, the deviation report for the	
	Violatio	n Description	·	2018 through March 31, 2019 reporting period did not include the	
				ailing to create the final record for a non-reportable emissions event ater than two weeks after the end of the emissions event.	
			1.0 .0		
				Base Penalt	\$25,000
				Dase Penait	\$23,000
>> En	vironme	ntal, Prope	rty and Hum	an Health Matrix	
		Release	Major	Harm Moderate Minor	
OR		Actual			
		Potential		Percent 0.0%	
				_	
>>Pro	gramma	tic Matrix Falsification	Major	Moderate Minor	
		Taisincation	Major	x Percent 1.0%	
				2,070	_
	Matrick				
	Matrix Notes		Less tha	n 30% of the rule requirements were not met.	
	Notes				
				Adjustment \$24,75	
				Aujustillent \$24,73	<u> </u>
					\$250
Violati	on Even	te			
Violati	OII LVCII				
		Number of \	/iolation Events	1 497 Number of violation days	
			daily weekly		
			monthly		
			quarterly	Violation Base Penalt	y \$250
			semiannual		
			annual		
			single event	X	
					-
				One single event is recommended.	
Good I	Eaith Eff	orts to Com	nlv	10.0% Reduction	\$25
Good i	aitii Lii	orts to com		10.0% Reduction efore NOE/NOV NOE/NOV to EDPRP/Settlement Offer	Ψ25
			Extraordinary		
			Ordinary	X	
			N/A		
				The Respondent completed the corrective measures by	
			Notes	February 4, 2021, after the NOE dated August 26, 2020.	
			<u>[</u>		
				Violation Subtota	\$225
Econor	mic Bene	efit (EB) for	this violation	on Statutory Limit Test	
			_		
		Estimate	ed EB Amount	\$22 Violation Final Penalty Tota	\$1,121
				This violation Final Assessed Penalty (adjusted for limits	\$1,121

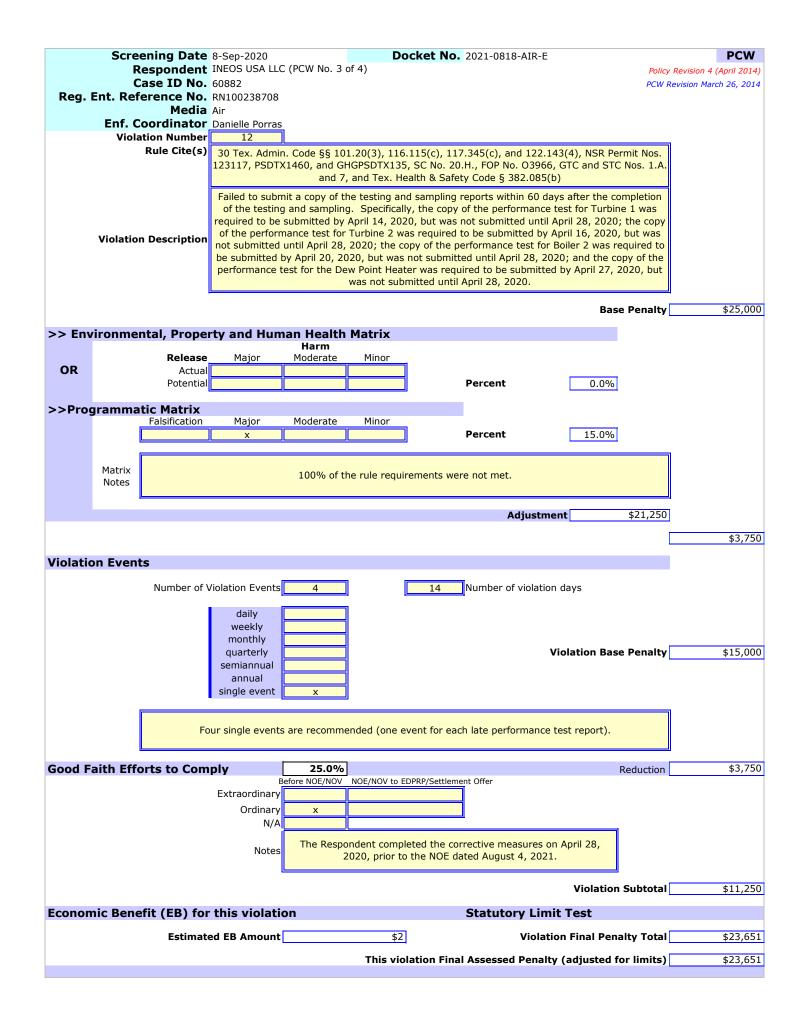
	E	conomic	Benefit	Wo	rksheet					
Respondent	INEOS USA LL	C (PCW No. 3 of 4	1)							
Case ID No.	60882									
Reg. Ent. Reference No.	RN100238708									
Media Violation No.						Percent Interest	Years of Depreciation			
						5.0	15			
	Item Cost	Date Required	Final Date	Yrs	Interest Saved	Costs Saved	EB Amount			
Item Description										
200m 2000 ipuon										
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 Other (as needed)	\$250	30-Apr-2019	4-Feb-2021	0.00 1.77	\$0 \$22	n/a n/a	\$0 \$22			
Notes for DELAYED costs	reporting pemissions evi	Estimated cost to submit a revised deviation report for the October 1, 2018 through March 31, 2019 reporting period to report the deviation for the failing to create the final record for a non-reportable emissions event no later than two weeks after the end of the emissions event. The Date Required is the date the deviation report was due and the Final Date is the date of compliance. See the Economic Benefit in Violation No. 3 of PCW No. 1 of 4 for implementing measures designed to ensure that all instances of deviations are reported in a timely manner.								
Avoided Costs	ANNUA	LIZE avoided co	osts before er		item (except for	one-time avoide	d costs)			
Disposal				0.00	\$0	\$0	\$0			
Personnel				0.00	\$0	\$0	\$0			
Inspection/Reporting/Sampling				0.00	\$0	\$0	\$0			
Supplies/Equipment				0.00	\$0	\$0	\$0			
Financial Assurance				0.00	\$0	\$0	\$0			
ONE-TIME avoided costs				0.00	\$0 \$0	\$0 \$0	\$0 \$0			
Other (as needed)				0.00	\$0	\$0	\$0			
Notes for AVOIDED costs										
Approx. Cost of Compliance		\$250			TOTAL		\$22			

	Scre	ening Date	8-Sep-2020	Docket No. 2021-0818-AIR-E	PCW
		•		(PCW No. 3 of 4)	Revision 4 (April 2014)
Dog		Case ID No. Terence No.		PCW	Revision March 26, 2014
Reg.	Liit. Kei	Media			
	Enf. C	coordinator	Danielle Porras		
	Viola	ation Number			1
		Rule Cite(s)	50 10/11/10/11/11	Code §§ 101.20(3), 116.115(c), and 122.143(4), NSR Permit Nos.	
			95 and PSD1)	(854M2, SC No. 2, FOP No. 02327, GTC and STC No. 26, and Tex. Health & Safety Code § 382.085(b)	
			- 11 11	, , ,	
				ent unauthorized emissions. Specifically, the Respondent released unds ("lbs") of carbon monoxide ("CO"), 1,486.37 lbs of NOx, and	
	Violatio	n Description		of volatile organic compounds ("VOC") from the No. 1 Olefins Flare,	
			EPN DM-1101,	during an emissions event (Incident No. 334381) that occurred on	
				April 22, 2020 and lasted seven hours.	
				Base Penalty	\$25,000
	.•				
>> Env	/ironme	ntai, Propei	rty and Hum	an Health Matrix Harm	
		Release	Major	Moderate Minor	
OR		Actual		X 20.00V	
		Potential		Percent 30.0%	
>>Prog	gramma	tic Matrix			
		Falsification	Major	Moderate Minor	
				Percent 0.0%	
		Human healt	h or the environ	ment has been exposed to significant amounts of pollutants that did	1
	Matrix Notes			ective of human health or environmental receptors as a result of the	
	Notes			violation.	
				Adjustment \$17,500	1
				Aujustinent \$17,500	
					\$7,500
Violatio	on Even	ts			
		Number of \	/iolation Events	1 Number of violation days	
			daily		
			weekly		
			monthly	X Violation Base Penalty	\$7,500
			quarterly semiannual	Violation base Penalty	\$7,300
			annual		
			single event		
					1
				One monthly event is recommended.	
Good F	aith Fff	orts to Com	nly	10.0% Reduction	\$750
dood i	aitii Eii	orts to com		efore NOE/NOV NOE/NOV to EDPRP/Settlement Offer	φ. 33
			Extraordinary		
			Ordinary	X	
			N/A	The Despendent completed the corrective managers by	
			Notes	The Respondent completed the corrective measures by September 27, 2022, after the NOE dated August 28,	
				2020.	
			_	Violation Subtotal	\$6,750
					\$0,750
Econon	nic Bene	efit (EB) for	this violation	n Statutory Limit Test	
		Estimate	ed EB Amount	\$1,216 Violation Final Penalty Total	\$13,301
			_	This violation Final Assessed Penalty (adjusted for limits)	\$13,301
				inis violation rinal Assessed Penalty (adjusted for limits)	\$10,JUI

	E	conomic	Benefit	Wo	rksheet		
Respondent	INEOS USA LL	C (PCW No. 3 of	4)				
Case ID No.	60882						
Reg. Ent. Reference No.	RN100238708						
Media							Years of
Violation No.						Percent Interest	Depreciation
Violation No.	10					F 0	
						5.0	15
	Item Cost	Date Required	Final Date	Yrs	Interest Saved	Costs Saved	EB Amount
Item Description							
Delayed Costs							
Equipment				0.00	\$0	\$0	\$0
Buildings				0.00	\$0	\$0	\$0
Other (as needed)				0.00	\$0	\$0	\$0
Engineering/Construction				0.00	\$0	\$0	\$0
Land				0.00	\$0	n/a	\$0
Record Keeping System				0.00	\$0	n/a	\$0
Training/Sampling				0.00	\$0	n/a	\$0
Remediation/Disposal				0.00	\$0	n/a	\$0
Permit Costs	+10.000	22.4. 2020	27.0 2022	0.00	\$0	n/a	\$0
Other (as needed)	\$10,000	22-Apr-2020	27-Sep-2022	2.43	\$1,216	n/a	\$1,216
	Estimated co	st to install samp	ole points and be	egin rou	itine sampling for 2	2301 and 3301 lube	oil and clean
						he recurrence of en	
Notes for DELAYED costs	due to the sa	ame or similar cau	uses as Incident	No. 33	4381. The Date R	equired is the date	the emissions
					ate is the date of		
						<u> </u>	
Avoided Costs	ANNUA	ALIZE avoided c	osts before er			one-time avoide	d costs)
Disposal				0.00	\$0	\$0	\$0
Personnel				0.00	\$0	\$0	\$0
Inspection/Reporting/Sampling				0.00	\$0	\$0	\$0
Supplies/Equipment				0.00	\$0	\$0	\$0
Financial Assurance				0.00	\$0	\$0 \$0	\$0
ONE-TIME avoided costs				0.00	\$0 \$0	\$0 \$0	\$0 \$0
Other (as needed)				0.00	\$0	\$0	\$0
Notes for AVOIDED costs							
				-			
Approx. Cost of Compliance		\$10,000			TOTAL		\$1,216

		ening Date			Docket No. 2021-0818-AIR	-E	PCW
				(PCW No. 3 of 4)		Policy	Revision 4 (April 2014)
_		ase ID No.				PCW R	evision March 26, 2014
Reg.	Ent. Ref		RN100238708				
	Enf C	Media	Air Danielle Porras				
		ation Number					
	VIOIC	Rule Cite(s)		C-1- CC 101 20(2) 1	16 115(-) 1122 142(4) NG	D. Daniella Mara	
		Ruic Citc(3)	50 . C/(1 / (d111111		16.115(c), and 122.143(4), NS P No. O2327, GTC and STC No. 1		
			75 and 1 5017		ty Code § 382.085(b)	zo, and rex.	
					-,		
					sions. Specifically, the Respond		
	Violetie	n December			Ox, and 2,916.80 lbs of VOC fro		
	violatio	n Description			eased 880.50 lbs of VOC as fugit No. 341971) that occurred on S		
			aariing arr airii		ive hours and 20 minutes.	, cp.co	
						Base Penalty	\$25,000
							1-0/000
>> En	vironme	ntal, Prope	rty and Hum	an Health Matrix			
		Release	Major	Harm Moderate Minor			
OR		Actual		Х			
		Potential			Percent 15.	0%	
		'					
>>Pro	gramma	tic Matrix	Madau	Madauata			
		Falsification	Major	Moderate Minor	Percent 0.	0%	
					Percent 0.	.070	
		Human health	or the environm	ent has been exposed	to insignificant amounts of poll	utants that did	•
	Matrix			•	n or environmental receptors as		
	Notes		•	violation	· 1.		
		,					•
					Adjustment	\$21,250	
							\$3,750
Violati	on Even	ts					
		Number of \	/iolation Events	1	1 Number of viola	tion days	
				-			
			daily				
			weekly				
			monthly				
			quarterly	X	Violation	Base Penalty	\$3,750
			semiannual annual				
			single event				
			omgio overic				
				One quarterly event is	recommended.		
Good F	aith Effo	orts to Com	ply	10.0%		Reduction	\$375
			To the state of th	efore NOE/NOV NOE/NOV	to EDPRP/Settlement Offer		
			Extraordinary				
			Ordinary		X		
			N/A				
			Notes	•	pleted the corrective measures	*	
			Notes	April 6, 2021, after th	e NOE dated December 15, 202	20.	
			<u>L</u>				
					Viola	tion Subtotal	\$3,375
Econor	mic Bene	efit (EB) for	this violation	on	Statutory Li	imit Test	
			_				÷7.001
		Estimate	ed EB Amount	\$2	86 Violation Final	renaity (otal	\$7,001
				This violation Fi	nal Assessed Penalty (adjust	ed for limits)	\$7,001

	E	conomic	Benefit	Wo	rksheet		
Respondent	INEOS USA LL	C (PCW No. 3 of	1)				
Case ID No.	60882						
Reg. Ent. Reference No.	RN100238708	3					
Media	Air						Years of
Violation No.	11					Percent Interest	Depreciation
11014101111101						5.0	15
	Thomas Cook	Data Danishad	Final Data	V	Interest Saved	Costs Saved	EB Amount
		Date Required	Final Date	Yrs	Interest Saveu	Costs Saveu	EB Amount
Item Description							
Delayed Costs	7			7			
Equipment				0.00	\$0	\$0	\$0
Buildings				0.00	\$0	\$0	\$0
Other (as needed)				0.00	\$0	\$0	\$0
Engineering/Construction				0.00	\$0	\$0	\$0
Land				0.00	\$0	n/a	\$0
Record Keeping System				0.00	\$0	n/a	\$0
Training/Sampling				0.00	\$0	n/a	\$0
Remediation/Disposal				0.00	\$0	n/a	\$0
Permit Costs	#10.000	0 Cam 2020	C Amm 2021	0.00	\$0	n/a	\$0 #206
Other (as needed)	\$10,000	9-Sep-2020	6-Apr-2021	0.57	\$286	n/a	\$286
						ert operators if the	
Notes for DELAYED costs		•				e to the same or sir	
Notes for DELATED Costs	Incident No.	341971. The Da	te Required is t	he date	the emissions eve	ent occurred and the	e Final Date is
			the d	late of c	compliance.		
Avoided Costs	ANNU	ALIZE avoided c	osts before er	terina	item (except for	one-time avoide	d costs)
Disposal				0.00	\$0	\$0	\$0
Personnel				0.00	\$0	\$0	\$0
Inspection/Reporting/Sampling				0.00	\$0	\$0	\$0
Supplies/Equipment				0.00	\$0	\$0	\$0
Financial Assurance				0.00	\$0	\$0	\$0
ONE-TIME avoided costs				0.00	\$0	\$0	\$0
Other (as needed)				0.00	\$0	\$0	\$0
Notes for AVOIDED costs							
		±10.000			TOTAL		+206
Approx. Cost of Compliance		\$10,000			TOTAL		\$286



	E	conomic	Benefit	Wo	rksheet		
Respondent	INEOS USA LL	.C (PCW No. 3 of	4)				
Case ID No.	60882						
Reg. Ent. Reference No.	RN100238708						
Media	Air					Percent Interest	Years of
Violation No.	12						Depreciation
						5.0	15
	Item Cost	Date Required	Final Date	Yrs	Interest Saved	Costs Saved	EB Amount
Item Description							
Delayed Costs				_			
Equipment				0.00	\$0	\$0	\$0
Buildings				0.00	\$0	\$0	\$0
Other (as needed)				0.00	\$0	\$0	\$0
Engineering/Construction				0.00	\$0	\$0	\$0
Land				0.00	\$0	n/a	\$0
Record Keeping System				0.00	\$0	n/a	\$0
Training/Sampling				0.00	\$0	n/a	\$0
Remediation/Disposal				0.00	\$0	n/a	\$0
Permit Costs	+1.000	111 1 2020	20.4 2020	0.00	\$0	n/a	\$0
Other (as needed)	\$1,000	14-Apr-2020	28-Apr-2020	0.04	\$2	n/a	\$2
Notes for DELAYED costs Avoided Costs	Dew Point Hea	ater (\$250/report). The Date Re is the	quired is date of	s the date the first compliance.	pine 1, Turbine 2, Bo report was due and one-time avoide	I the Final Date
Disposal	Ailito	TELE AVOIDED C	osts before er	0.00	\$0	\$0	\$0
Personnel				0.00	\$0	\$0 \$0	\$0 \$0
Inspection/Reporting/Sampling				0.00	\$0	\$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		\$1,000			TOTAL		\$2

	E	conomic	Benefit	Wo	rksheet		
Respondent	INEOS USA LL	.C (PCW No. 3 of	4)				
Case ID No.							
Reg. Ent. Reference No.	RN100238708	}					
Media						Percent Interest	Years of
Violation No.	13					reiteilt Interest	Depreciation
						5.0	15
	Item Cost	Date Required	Final Date	Yrs	Interest Saved	Costs Saved	EB Amount
Item Description							
Delayed Costs							
Equipment				0.00	\$0	\$0	\$0
Buildings				0.00	\$0	\$0	\$0
Other (as needed)				0.00	\$0	\$0	\$0
Engineering/Construction				0.00	\$0	\$0	\$0
Land				0.00	\$0	n/a	\$0
Record Keeping System				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)	\$8,000	14-Feb-2020	1-Jul-2025	5.38	\$2,152	n/a	\$2,152
Notes for DELAYED costs			quired is the da	te of the		ne SO2 hourly MAER ack test and the Fin	
Avoided Costs	ANNU	ALIZE avoided c	osts before ei	ntering	item (except for	one-time avoide	d costs)
Disposal				0.00	\$0	\$0	\$0
Personnel				0.00	\$0	\$0	\$0
Inspection/Reporting/Sampling				0.00	\$0	\$0	\$0
Supplies/Equipment				0.00	\$0	\$0	\$0
Financial Assurance				0.00	\$0	\$0	\$0
ONE-TIME avoided costs				0.00	\$0	\$0	\$0
Other (as needed)				0.00	\$0	\$0	\$0
Notes for AVOIDED costs							

	ening Date		Docket No. 2021-0818-AIR-E	PCW
	espondent ase ID No.			icy Revision 4 (April 2014)
Reg. Ent. Ref			PCV	V Revision March 26, 2014
	Media	Air		
	oordinator tion Number	Danielle Porras		
Viola			Code §§ 101.20(3), 116.115(b)(2)(F) and (c), and 122.143(4), NS	D
	. ,	Permit Nos. 1	23117, PSDTX1460, and GHGPSDTX135, SC No. 1, FOP No. 03966,	
		GTC a	nd STC No. 7, and Tex. Health & Safety Code § 382.085(b)	
		Failed to con	aply with the MAER. Specifically, during a stack test completed on	
Violation	Description		020, the Respondent exceeded the SO2 MAER of 0.07 lb/hr by 0.03	8
		ib/nr for 11	urbine 2, EPN Turbine 2, resulting in approximately 499.78 lbs of unauthorized SO2 emissions.	
			Base Penalt	y \$25,000
>> Environmen	ntal, Prope	rty and Hum	an Health Matrix	
	Release	_	Harm	
OR	Actual	Major	Moderate Minor x	
	Potential		Percent 15.0%	
>>Programma	tic Matrix			
Frogramma	Falsification	Major	Moderate Minor	
			Percent 0.0%	
	Human health	or the environr	nent has been exposed to insignificant amounts of pollutants that di	d
Matrix Notes			tective of human health or environmental receptors as a result of th	
Notes			violation.	
			Adjustment \$21,25	0
				\$3,750
				\$3,730
Violation Event	S			
	Number of \	/iolation Events	7 548 Number of violation days	
		doily		
		daily weekly		
		monthly		
		quarterly semiannual	X Violation Base Penalt	y \$26,250
		annual		
		single event		
	C		The second secon	
	Seven qua	•	recommended from the February 16, 2020 stack test date to the 2021 screening date for Investigation No. 1659825.	
Good Faith Effo	rts to Com		0.0% Reductio	n \$0
		Extraordinary	efore NOE/NOV NOE/NOV to EDPRP/Settlement Offer	
		Ordinary		
		N/A	х	
		Notes	The Respondent does not meet the good faith criteria for	
			this violation.	
			Violation Subtota	\$26,250
Economic Bene	fit (EB) for	this violation	on Statutory Limit Test	
Economic Bene				¢47.426
Economic Bene		this violation	\$2,150 Statutory Limit Test \$2,150 Violation Final Penalty Tota This violation Final Assessed Penalty (adjusted for limits	

	E	conomic	Benefit	Wo	rksheet		
Respondent	INEOS USA LL	.C (PCW No. 3 of	1)				
Case ID No.	60882						
Reg. Ent. Reference No.	RN100238708						
Media Violation No.	Air					Percent Interest	Years of Depreciation
						5.0	15
	Item Cost	Date Required	Final Date	Yrs	Interest Saved	Costs Saved	EB Amount
Item Description		•					
200 2000puo							
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)	\$8,000	16-Feb-2020	1-Jul-2025	5.38	\$2,150	n/a	\$2,150
Notes for DELAYED costs			uired is the da	e of the		ne SO2 hourly MAEF ack test and the Fin	
Avoided Costs	ANNU	ALIZE avoided c	osts before ei	ntering	item (except for	one-time avoide	d costs)
Disposal				0.00	\$0	\$0	\$0
Personnel				0.00	\$0	\$0	\$0
Inspection/Reporting/Sampling				0.00	\$0	\$0	\$0
Supplies/Equipment				0.00	\$0	\$0	\$0
Financial Assurance				0.00	\$0	\$0	\$0
ONE-TIME avoided costs				0.00	\$0	\$0	\$0
Other (as needed)				0.00	\$0	\$0	\$0
Notes for AVOIDED costs							
Approx. Cost of Compliance		\$8,000			TOTAL		\$2,150

		ening Date		Docket No. 2021-0818-AIR-E	PCW
	R	espondent	INEOS USA LLO	C (PCW No. 3 of 4)	licy Revision 4 (April 2014)
		ase ID No.		PCI	W Revision March 26, 2014
Reg.	Ent. Ref	erence No.	RN100238708		
		Media			
			Danielle Porras		
	Viola	tion Number			_
		Rule Cite(s)	30 Tex. Admin	. Code §§ 101.20(3), 116.115(b)(2)(F) and (c), and 122.143(4), NS	iR
			Permit Nos. 1	.23117, PSDTX1460, and GHGPSDTX135, SC No. 1, FOP No. O3966,	,
			GTC :	and STC No. 7, and Tex. Health & Safety Code § 382.085(b)	
				mply with the MAER. Specifically, during a stack test completed on	
	Violatio	n Description		2020, the Respondent exceeded the SO2 MAER of 0.05 lb/hr by 0.00	
			וט/ווו וטו סטוונ	er 2, EPN BLR2, resulting in approximately 39.17 lbs of unauthorized SO2 emissions.	
				SOZ CINISSIONS.	
				Base Penal	\$25,000
>> Env	vironme	ntai, Prope	rty and Hun	nan Health Matrix Harm	
		Release	Major	Moderate Minor	
OR		Actual		X	
		Potential		Percent 15.0%	
>>Prog	gramma	tic Matrix			
		Falsification	Major	Moderate Minor	
				Percent 0.0%	
	Matrix			ment has been exposed to insignificant amounts of pollutants that dotective of human health or environmental receptors as a result of the	
	Notes	not exceed lev	veis triat are pro	violation.	
				11010000111	
				Adjustment \$21,25	50
					\$3,750
Violatio	on Even	te			\$3,750
Violatio	on Even	ts			\$3,750
Violatio	on Even		Violation Events	3 544 Number of violation days	\$3,750
Violatio	on Even		/iolation Events	3 544 Number of violation days	\$3,750
Violatio	on Even		/iolation Events daily	3 544 Number of violation days	\$3,750
Violatio	on Even		daily weekly	3 544 Number of violation days	\$3,750
Violatio	on Even		daily weekly monthly		
Violatio	on Even		daily weekly monthly quarterly	Violation Base Penal	
Violatio	on Even		daily weekly monthly quarterly semiannual		
Violatio	on Even		daily weekly monthly quarterly semiannual annual	Violation Base Penal	
Violatio	on Even		daily weekly monthly quarterly semiannual	Violation Base Penal	
Violatio	on Even	Number of \	daily weekly monthly quarterly semiannual annual single event	Violation Base Penalt	
Violatio	on Even	Number of \	daily weekly monthly quarterly semiannual annual single event	Violation Base Penals x re recommended from the February 20, 2020 stack test date to the	
Violatio	on Even	Number of \	daily weekly monthly quarterly semiannual annual single event	Violation Base Penalt	
		Number of N	daily weekly monthly quarterly semiannual annual single event	Violation Base Penals x re recommended from the February 20, 2020 stack test date to the August 17, 2021 screening date.	ty \$11,250
		Number of \	daily weekly monthly quarterly semiannual annual single event	violation Base Penals x re recommended from the February 20, 2020 stack test date to the August 17, 2021 screening date. 0.0% Reduction	ty \$11,250
		Number of N	daily weekly monthly quarterly semiannual annual single event	Violation Base Penals x re recommended from the February 20, 2020 stack test date to the August 17, 2021 screening date. Reduction Sefore NOE/NOV NOE/NOV to EDPRP/Settlement Offer	ty \$11,250
		Number of N	daily weekly monthly quarterly semiannual annual single event annual events a	Violation Base Penals x re recommended from the February 20, 2020 stack test date to the August 17, 2021 screening date. Reduction Sefore NOE/NOV NOE/NOV to EDPRP/Settlement Offer	ty \$11,250
		Number of N	daily weekly monthly quarterly semiannual annual single event ennual events a	Violation Base Penals x re recommended from the February 20, 2020 stack test date to the August 17, 2021 screening date. Reduction O.0% NOE/NOV NOE/NOV to EDPRP/Settlement Offer	ty \$11,250
		Number of N	daily weekly monthly quarterly semiannual annual single event annual events a	Violation Base Penals x re recommended from the February 20, 2020 stack test date to the August 17, 2021 screening date. Reduction Sefore NOE/NOV NOE/NOV to EDPRP/Settlement Offer X	ty \$11,250
		Number of N	daily weekly monthly quarterly semiannual annual single event ennual events a	Violation Base Penals x re recommended from the February 20, 2020 stack test date to the August 17, 2021 screening date. Reduction Sefore NOE/NOV NOE/NOV to EDPRP/Settlement Offer X The Respondent does not meet the good faith criteria for	ty \$11,250
		Number of N	daily weekly monthly quarterly semiannual annual single event ennual events a Extraordinary Ordinary N/A	Violation Base Penals x re recommended from the February 20, 2020 stack test date to the August 17, 2021 screening date. Reduction Before NOE/NOV NOE/NOV to EDPRP/Settlement Offer x The Respondent does not meet the good faith criteria for	ty \$11,250
		Number of N	daily weekly monthly quarterly semiannual annual single event ennual events a Extraordinary Ordinary N/A	Violation Base Penals x re recommended from the February 20, 2020 stack test date to the August 17, 2021 screening date. Reduction Before NOE/NOV NOE/NOV to EDPRP/Settlement Offer x The Respondent does not meet the good faith criteria for this violation.	sy \$11,250
		Number of N	daily weekly monthly quarterly semiannual annual single event ennual events a Extraordinary Ordinary N/A	Violation Base Penals x re recommended from the February 20, 2020 stack test date to the August 17, 2021 screening date. Reduction Sefore NOE/NOV NOE/NOV to EDPRP/Settlement Offer X The Respondent does not meet the good faith criteria for	sy \$11,250
Good F	aith Effe	Three semia	daily weekly monthly quarterly semiannual annual single event ennual events a Extraordinary Ordinary N/A	Violation Base Penals The Respondent does not meet the good faith criteria for this violation. Violation Base Penals Violation Base Penals Reduction Reduction X The Respondent does not meet the good faith criteria for this violation. Violation Subtot	sy \$11,250
Good F	aith Effe	Three semicorts to Com	daily weekly monthly quarterly semiannual annual single event annual events a ply Extraordinary Ordinary N/A Notes	Violation Base Penals The Respondent does not meet the good faith criteria for this violation. Violation Subtot Statutory Limit Test	sty \$11,250 n \$0 al \$11,250
Good F	aith Effe	Three semicorts to Com	daily weekly monthly quarterly semiannual annual single event annual events a ply Extraordinary Ordinary N/A Notes	Violation Base Penals x re recommended from the February 20, 2020 stack test date to the August 17, 2021 screening date. Reduction Sefore NOE/NOV NOE/NOV to EDPRP/Settlement Offer x The Respondent does not meet the good faith criteria for this violation. Violation Subtot Statutory Limit Test	sty \$11,250 n \$0 al \$11,250
Good F	aith Effe	Three semicorts to Com	daily weekly monthly quarterly semiannual annual single event annual events a ply Extraordinary Ordinary N/A Notes	Violation Base Penals The Respondent does not meet the good faith criteria for this violation. Violation Subtot Statutory Limit Test	sty \$11,250 n \$0 a1 \$11,250

	E	conomic	Benefit	Wo	rksheet		
Respondent	INEOS USA LL	.C (PCW No. 3 of 4	4)				
Case ID No.	60882						
Reg. Ent. Reference No.	RN100238708	1					
Media	Air					Percent Interest	Years of
Violation No.	15					r creene zneerese	Depreciation
						5.0	15
	Item Cost	Date Required	Final Date	Yrs	Interest Saved	Costs Saved	EB Amount
Item Description		•					
zeem Desemption							
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)	\$8,000	20-Feb-2020	1-Jul-2025	5.36	\$2,146	n/a	\$2,146
Notes for DELAYED costs	EPN BLR2	. The Date Requi	red is the date estimate	of the need date	on-compliant stack of compliance.	the SO2 hourly MAE k test and the Final	Date is the
Avoided Costs	ANNU/	ALIZE avoided c	osts before ei	tering	item (except for	one-time avoide	d costs)
Disposal				0.00	\$0	\$0	\$0
Personnel				0.00	\$0	\$0	\$0
Inspection/Reporting/Sampling				0.00	\$0	\$0	\$0
Supplies/Equipment				0.00	\$0	\$0	\$0
Financial Assurance	i			0.00	\$0	\$0	\$0 \$0
				0.00	\$0	\$0	
ONE-TIME avoided costs							
ONE-TIME avoided costs Other (as needed)				0.00	\$0	\$0	\$0

		ening Date		Docket No. 2021-0818-AIR-E	PCW
	R	espondent	INEOS USA LLO	C (PCW No. 3 of 4)	cy Revision 4 (April 2014)
		ase ID No.		PCW	Revision March 26, 2014
Reg.	Ent. Ref		RN100238708		
		Media			
			Danielle Porras	1	
	Viola	tion Number			-
		Rule Cite(s)		Code §§ 101.20(3), 116.115(b)(2)(F) and (c), and 122.143(4), NSF	R
				23117, PSDTX1460, and GHGPSDTX135, SC No. 1, FOP No. 03966,	
			GIC	and STC No. 7, and Tex. Health & Safety Code § 382.085(b)	
				nply with the MAER. Specifically, during a stack test completed on	
	Violatio	n Description		020, the Respondent exceeded the particulate matter ("PM") MAER of	f
		-	1.95 IDS/IIF DY	0.46 lb/hr for Boiler 1, EPN BLR1, resulting in approximately 839.04 lbs of unauthorized PM emissions.	
				ibs of diladifionized FPI ethissions.	
					_
				Base Penalty	\$25,000
_					
>> Env	vironme	ntal, Propei	rty and Hum	an Health Matrix	
		Release	Major	Harm Moderate Minor	
OR		Actual		X	
		Potential		Percent 15.0%	
>>Pro	gramma	tic Matrix			
		Falsification	Major	Moderate Minor	
				Percent 0.0%	
					¬
	Matrix			nent has been exposed to insignificant amounts of pollutants that did	
	Notes	not exceed lev	vels that are pro	tective of human health or environmental receptors as a result of the violation.	
				VIOIALIOIT.	
				Adjustment \$21,250	1
				Aujustinent	4
					\$3,750
	_				
Violatio	on Event	ts			
		Number of \	Violation Events	1 76 Number of violation days	
		Number of V	Violation Events	70 Number of Violation days	
			daily		
			weekly		
			monthly		
			quarterly	X Violation Base Penalty	\$3,750
			semiannual		
			annual · ·		
			single event		
					1
		One quarterly	y event is recon	nmended from the February 29, 2020 stack test date to the May 15,	
				2020 compliance date.	
Good F	aith Effo	orts to Com		25.0% Reduction	\$937
				efore NOE/NOV NOE/NOV to EDPRP/Settlement Offer	
			Extraordinary		
			Ordinary	X	
			N/A		
			Natas	The Respondent completed the corrective measures on	
			Notes	May 15, 2020, prior to the NOE dated August 4, 2021.	
				Violation Subtota	\$2,813
Econor	nic Bene	efit (EB) for	this violation	on Statutory Limit Test	
		Estimate	ed EB Amount	\$83 Violation Final Penalty Tota	\$6,439
				•	
				This violation Final Assessed Penalty (adjusted for limits	\$6,439

		conomic	Benefit	WOI	rksneet		
Respondent Case ID No. Reg. Ent. Reference No.	60882	C (PCW No. 3 of 4	4)				
Media Violation No.	Air					Percent Interest	Years of Depreciation
						5.0	15
	Item Cost	Date Required	Final Date	Yrs	Interest Saved	Costs Saved	EB Amount
Item Description							
Delayed Costs				_			
Equipment				0.00	\$0	\$0	\$0
Buildings				0.00	\$0	\$0	\$0
Other (as needed)				0.00	\$0	\$0	\$0
Engineering/Construction				0.00	\$0	\$0	\$0
Land				0.00	\$0	n/a	\$0
Record Keeping System				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)	\$8,000	29-Feb-2020	15-May-2020	0.21	\$83	n/a	\$83
Notes for DELAYED costs					mpliant stack test a	e PM hourly MAER for and the Final Date is	
Avoided Costs	ANNU	ALIZE avoided c	osts before en	tering		one-time avoided	i costs)
Disposal	ANNU	ALIZE avoided o	osts before en	tering 0.00	\$0	\$0	i costs) \$0
Disposal Personnel	ANNU	ALIZE avoided o	osts before en	0.00 0.00	\$0 \$0	\$0 \$0	\$0 \$0 \$0
Disposal Personnel nspection/Reporting/Sampling	ANNU	ALIZE avoided o	osts before en	0.00 0.00 0.00	\$0 \$0 \$0	\$0 \$0 \$0	\$0 \$0 \$0 \$0
Disposal Personnel nspection/Reporting/Sampling Supplies/Equipment	ANNU	ALIZE avoided o	osts before en	0.00 0.00 0.00 0.00	\$0 \$0 \$0 \$0 \$0	\$0 \$0 \$0 \$0	\$0 \$0 \$0 \$0 \$0
Disposal Personnel nspection/Reporting/Sampling Supplies/Equipment Financial Assurance	ANNU	ALIZE avoided c	osts before en	0.00 0.00 0.00 0.00 0.00	\$0 \$0 \$0 \$0 \$0 \$0	\$0 \$0 \$0 \$0 \$0 \$0	\$0 \$0 \$0 \$0 \$0 \$0
Disposal Personnel nspection/Reporting/Sampling Supplies/Equipment Financial Assurance ONE-TIME avoided costs	ANNU	ALIZE avoided c	osts before en	tering 0.00 0.00 0.00 0.00 0.00 0.00	\$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	\$0 \$0 \$0 \$0 \$0 \$0 \$0	\$0 \$0 \$0 \$0 \$0 \$0 \$0
Disposal Personnel nspection/Reporting/Sampling Supplies/Equipment Financial Assurance	ANNU.	ALIZE avoided o	osts before en	0.00 0.00 0.00 0.00 0.00	\$0 \$0 \$0 \$0 \$0 \$0	\$0 \$0 \$0 \$0 \$0 \$0	\$0 \$0 \$0 \$0 \$0 \$0
Disposal Personnel Inspection/Reporting/Sampling Supplies/Equipment Financial Assurance ONE-TIME avoided costs	ANNU	ALIZE avoided o	osts before en	tering 0.00 0.00 0.00 0.00 0.00 0.00	\$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	\$0 \$0 \$0 \$0 \$0 \$0 \$0	\$0 \$0 \$0 \$0 \$0 \$0 \$0

		ening Date		Docket No. 2021-0818-AIR-E	PCW
					icy Revision 4 (April 2014)
D		ase ID No.		PCV	/ Revision March 26, 2014
Reg.	Ent. Ker	erence No. Media	RN100238708		
	Enf. C		Danielle Porras		
		ation Number			
		Rule Cite(s)	20 Tay Admin	Code SS 101 20/2) 116 11E/b/(2)/E) and (a) and 122 142/4) NC	
				Code §§ 101.20(3), 116.115(b)(2)(F) and (c), and 122.143(4), NS 23117, PSDTX1460, and GHGPSDTX135, SC No. 1, FOP No. O3966,	
				and STC No. 7, and Tex. Health & Safety Code § 382.085(b)	
				mply with the MAER. Specifically, during a stack test completed on	
	Violatio	n Description		2020, the Respondent exceeded the PM MAER of 1.95 lbs/hr by 8.26 Boiler 2, EPN BLR2, resulting in approximately 17,643.36 lbs of	
			.23,	unauthorized PM emissions.	
				Base Penalt	y \$25,000
>> Fnv	vironme	ntal. Prone	rty and Hum	an Health Matrix	
, , <u>_</u>		iitai, i i ope	cy and man	Harm	
0.0		Release	Major	Moderate Minor	
OR		Actual Potential		X Percent 30.0%	
		Potential		Percent 30.0%	
>>Pro	gramma	tic Matrix			
		Falsification	Major	Moderate Minor	
				Percent 0.0%	
		Human hoalt	h or the enviror	ment has been exposed to significant amounts of pollutants that did	
	Matrix			tective of human health or environmental receptors as a result of th	
	Notes			violation.	
					-
				Adjustment \$17,50	0
					\$7,500
Violatio	on Even	t-c			
Violatio	OII EVEII	LS			
		Number of \	iolation Events	89 Number of violation days	
			daily		
			daily weekly		
			monthly	х	
			quarterly	Violation Base Penalt	y \$22,500
			semiannual		
			annual		
			single event		
		Three marth	ly ovente are	ocommonded from the Echrupy 20, 2020 stock test data to the Many	1
		THIEE HIGHLI	ily events are re	ecommended from the February 20, 2020 stack test date to the May 19, 2020 compliance date.	
					_
Good F	aith Eff	orts to Com		25.0% Reductio	s5,625
				efore NOE/NOV NOE/NOV to EDPRP/Settlement Offer	
			Extraordinary		
			Ordinary	X	
			N/A		
			Notes	The Respondent completed the corrective measures on	
				May 19, 2020, prior to the NOE dated August 4, 2021.	
				Violation Subtota	s16,875
					φ10,073
Econor	nic Bene	efit (EB) for	this violati	on Statutory Limit Test	
		Estimate	ed EB Amount	\$98 Violation Final Penalty Tota	s35,126
				This violation Final Assessed Penalty (adjusted for limits	\$35,126
				ims violation i mai Assesseu rendity (dujusteu ior iimits	, \$33,120

	E	conomic	Benefit	Woı	rksheet		
Respondent	INEOS USA LL	.C (PCW No. 3 of	4)				
Case ID No.	60882						
Reg. Ent. Reference No.		}					
Media Violation No.	Air					Percent Interest	Years of Depreciation
Violation No.	17					5.0	15
	Itom Cost	Date Required	Final Date	Yrs	Interest Saved	Costs Saved	EB Amount
The man Brown death and		Date Required	rillai Date	115	Interest Saveu	Costs Saveu	EB Allioulit
Item Description							
Delayed Costs	1	1		1			
Equipment				0.00	\$0	\$0	\$0
Buildings				0.00	\$0	\$0	\$0
Other (as needed)				0.00	\$0	\$0	\$0
Engineering/Construction				0.00	\$0	\$0	\$0
Land				0.00	\$0	n/a	\$0
Record Keeping System				0.00	\$0	n/a	\$0
Training/Sampling				0.00	\$0	n/a	\$0 \$0
Remediation/Disposal				0.00	\$0 \$0	n/a n/a	\$0 \$0
Permit Costs Other (as needed)	\$8,000	20-Feb-2020	19-May-2020	0.00	\$98	n/a	\$98
Notes for DELAYED costs	BLR2. The	Date Required is	the date of the	non-cor compli	mpliant stack test a ance.	e PM hourly MAER fo and the Final Date is	the date of
Avoided Costs	ANNU	ALIZE avoided o	osts before en	tering	item (except for	one-time avoided	l costs)
Disposal				0.00	\$0	\$0	\$0
Personnel				0.00	\$0	\$0	\$0
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		\$8,000			TOTAL		\$98

		ening Date			et No. 2021-0818-AIR-E	PCW
				C (PCW No. 3 of 4)		Policy Revision 4 (April 2014)
Daa		Case ID No.				PCW Revision March 26, 2014
Reg.	ent. Kei	rerence No. Media	RN100238708			
	Enf. C		Danielle Porras	;		
		ation Number				
		Rule Cite(s)		in Codo SS 101 20/2) 116 11	IE(a) 117 210(a)(2) and 122 142	(4)
					L5(c), 117.310(c)(2), and 122.143 Id GHGPSDTX135, SC No. 7, FOP N	
					ex. Health & Safety Code § 382.08	
			Failed to co	emply with the concentration li	mit. Specifically, during a stack te	st
	Violatio	n Description			ondent exceeded the ammonia ("N	
			concentration		volume dry ("ppmvd") corrected to	o 3.0
			perce	ent oxygen (% O2) by 2.25 p	ppmvd for Boiler 3, EPN BLR3.	
					Base Pe	nalty \$25,000
>> Env	vironme	ntal, Prope	rty and Hum	nan Health Matrix		
		Release	Major	Harm Moderate Minor		
OR		Actual		x		
		Potential			Percent 15.0%	
>>Pro	gramma	tic Matrix Falsification	Major	Moderate Minor		
		1 disirication	Major	Moderate Minor	Percent 0.0%	
	Matrix			•	ignificant amounts of pollutants tha	
	Notes	not exceed lev	vels that are pro	otective of human health or en violation.	vironmental receptors as a result of	of the
				violation.		
					Adjustment \$2	1,250
						\$3,750
						ψ3/130
Violati	on Even	ts				
		Number of \	Violation Events	3	81 Number of violation days	
					02	
			daily			
			weekly			
			monthly guarterly	X	Violation Base Pe	nalty \$11,250
			semiannual			411/200
			annual			
			single event			
		Three quarte	erly events are r	ecommended from the Februa 20, 2020 compliance da	ry 29, 2020 stack test date to the	May
Good F	aith Eff	orts to Com		25.0%	Redu	sction \$2,812
			Extraordinary	Before NOE/NOV NOE/NOV to EDPR	P/Settlement Offer	
			Ordinary			
			N/A			
			14/7		ble a second skip of the second	
			Notes	The Respondent completed May 20, 2020, prior to the I		
				, 20, 2020, prior to the i		
					Violation Sub	stotal \$8,438
Econor	mic Ben	efit (ER) for	this violati	on	Violation Sub	
Econor	mic Bene		this violati		Violation Sub Statutory Limit Tes	st
Econor	mic Bend		this violati		Violation Sub	st

	E	conomic	Benefit	Woi	rksheet		
Respondent	INEOS USA LL	.C (PCW No. 3 of 4	!)				
Case ID No.	60882						
Reg. Ent. Reference No.	RN100238708						
Media							Years of
Violation No.						Percent Interest	Depreciation
Violation ito.	10					г о	
						5.0	15
	Item Cost	Date Required	Final Date	Yrs	Interest Saved	Costs Saved	EB Amount
Item Description							
Delayed Costs							
Equipment				0.00	\$0	\$0	\$0
Buildings				0.00	\$0	\$0	\$0
Other (as needed)				0.00	\$0	\$0	\$0
Engineering/Construction				0.00	\$0	\$0	\$0
Land				0.00	\$0	n/a	\$0
Record Keeping System				0.00	\$0	n/a	\$0
Training/Sampling				0.00	\$0	n/a	\$0
Remediation/Disposal				0.00	\$0	n/a	\$0
Permit Costs				0.00	\$0	n/a	\$0
Other (as needed)	\$8,000	29-Feb-2020	20-May-2020	0.22	\$89	n/a	\$89
Notes for DELAYED costs	3, EPN BLR3.	The Date Require	ed is the date of	the no	n-compliant stack liance.	e NH3 concentration test and the Final D	ate is the date
Avoided Costs	ANNU	ALIZE avoided c	osts before en	tering	item (except for	one-time avoided	l 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		\$8,000			TOTAL		\$89

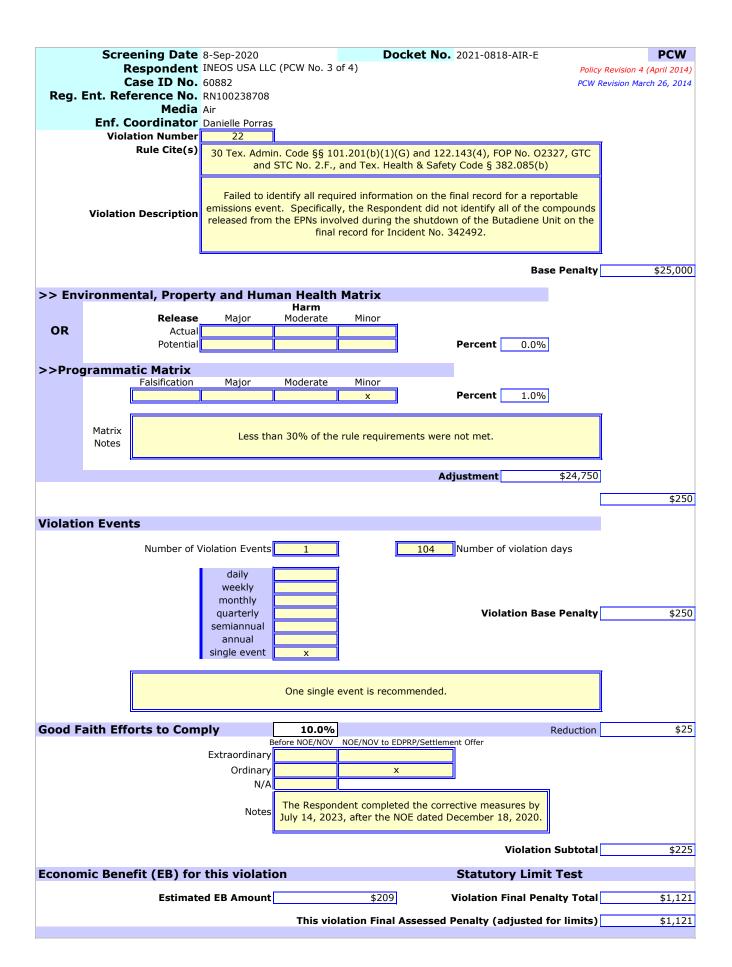
		ening Date	•	Docket No. 2021-0818-AIR-E	PCW
		•		C (PCW No. 3 of 4)	Policy Revision 4 (April 2014)
_		ase ID No.		P	CW Revision March 26, 2014
Reg.	Ent. Ref		RN100238708		
	Enf (Media			
		ation Number	Danielle Porras	Ī	
	VIOI	Rule Cite(s)			
		Rule Cite(s)		. Code §§ 117.340(a) and 122.143(4), FOP No. O3966, GTC and S	STC STC
				No. 1.A., and Tex. Health & Safety Code § 382.085(b)	
			Failed to m	aintain and operate a totalizing fuel flow meter to individually and	
	Violetie	n Docerintian	continuously	measure the gas and liquid fuel usage. Specifically, during the sta	ck
	violatio	n Description	test conducte	d from February 26, 2020 to February 27, 2020, the fuel flow met	<mark>er </mark>
				for the Dew Point Heater was not operational.	
				Base Pena	\$25,000
>> En	vironme	ntal, Prope	rtv and Hum	nan Health Matrix	
, , <u></u>		,	o, ana man	Harm	
		Release	Major	Moderate Minor	
OR		Actual			
		Potential		x Percent 7.0%	
>>Dro	aramma	tic Matrix			
FIU	gramma	Falsification	Major	Moderate Minor	
			- 7-	Percent 0.0%	
	Matrix	Human healt	th or the enviro	nment will or could be exposed to insignificant amounts of pollutan	ts
	Matrix Notes	that would no	ot exceed levels	that are protective of human health or environmental receptors as	s a
	Notes			result of the violation.	
				A divolution and	250
				Adjustment \$23,7	250
					+4 750
					\$1,750
	_				\$1,750
Violati	on Even	ts			\$1,750
Violati	on Even		Jiolation Events	1 Number of violation days	\$1,750
Violati	on Even		Violation Events	1 Number of violation days	\$1,/50
Violati	on Even		Violation Events	1 Number of violation days	\$1,/50
Violati	ion Even			1 Number of violation days	\$1,/50
Violati	on Even		daily weekly monthly		
Violati	on Even		daily weekly monthly quarterly	1 1 Number of violation days Violation Base Pena	
Violati	on Even		daily weekly monthly quarterly semiannual		
Violati	on Even		daily weekly monthly quarterly semiannual annual		
Violati	on Even		daily weekly monthly quarterly semiannual		
Violati	on Even		daily weekly monthly quarterly semiannual annual		
Violati	on Even		daily weekly monthly quarterly semiannual annual		
Violati	on Even		daily weekly monthly quarterly semiannual annual	Violation Base Pena	
		Number of \	daily weekly monthly quarterly semiannual annual single event	Violation Base Pena X One single event is recommended.	\$1,750
			daily weekly monthly quarterly semiannual annual single event	Violation Base Pena	\$1,750
		Number of \	daily weekly monthly quarterly semiannual annual single event	Violation Base Pena X One single event is recommended. Reduct	\$1,750
		Number of \	daily weekly monthly quarterly semiannual annual single event	Violation Base Pena X One single event is recommended. Reduct	\$1,750
		Number of \	daily weekly monthly quarterly semiannual annual single event	Violation Base Pena X One single event is recommended. 25.0% Reduct Reduct	\$1,750
		Number of \	daily weekly monthly quarterly semiannual annual single event Extraordinary Ordinary	Violation Base Pena X One single event is recommended. 25.0% Reduct Reduct	\$1,750
		Number of \	daily weekly monthly quarterly semiannual annual single event Extraordinary Ordinary	Violation Base Pena X One single event is recommended. 25.0% Reduct Reduct X X	\$1,750
		Number of \	daily weekly monthly quarterly semiannual annual single event Extraordinary Ordinary N/A	Violation Base Pena X One single event is recommended. 25.0% Reduct Perore NOE/NOV NOE/NOV to EDPRP/Settlement Offer X The Respondent completed the corrective measures on	\$1,750
		Number of \	daily weekly monthly quarterly semiannual annual single event Extraordinary Ordinary N/A	One single event is recommended. 25.0% Reduct NOE/NOV to EDPRP/Settlement Offer X The Respondent completed the corrective measures on February 27, 2020, prior to the NOE dated August 4,	\$1,750 sion \$437
Good I	Faith Eff	Number of \	daily weekly monthly quarterly semiannual annual single event Extraordinary Ordinary N/A Notes	One single event is recommended. 25.0% Reduct efore NOE/NOV NOE/NOV to EDPRP/Settlement Offer X The Respondent completed the corrective measures on February 27, 2020, prior to the NOE dated August 4, 2021. Violation Subto	sity \$1,750 ion \$437
Good I	Faith Eff	Number of \	daily weekly monthly quarterly semiannual annual single event Extraordinary Ordinary N/A	One single event is recommended. 25.0% Reduct efore NOE/NOV NOE/NOV to EDPRP/Settlement Offer X The Respondent completed the corrective measures on February 27, 2020, prior to the NOE dated August 4, 2021. Violation Subto	sity \$1,750 ion \$437
Good I	Faith Eff	Number of \	daily weekly monthly quarterly semiannual annual single event Extraordinary Ordinary N/A Notes	One single event is recommended. 25.0% Reduct efore NOE/NOV NOE/NOV to EDPRP/Settlement Offer X The Respondent completed the corrective measures on February 27, 2020, prior to the NOE dated August 4, 2021. Violation Subto	\$1,750 sion \$437
Good I	Faith Eff	Number of \	daily weekly monthly quarterly semiannual annual single event Extraordinary Ordinary N/A Notes	One single event is recommended. 25.0% Sefore NOE/NOV NOE/NOV to EDPRP/Settlement Offer X The Respondent completed the corrective measures on February 27, 2020, prior to the NOE dated August 4, 2021. Violation Subto	ion \$437

	E	conomic	Benefit	Wo	rksheet		
Respondent Case ID No. Reg. Ent. Reference No.	60882	LC (PCW No. 3 of 4	4)				
Media Violation No.						Percent Interest	Years of Depreciation
						5.0	15
	Item Cost	Date Required	Final Date	Yrs	Interest Saved	Costs Saved	EB Amount
Item Description							
Delayed Costs							
Equipment				0.00	\$0	\$0	\$0
Buildings				0.00	\$0	\$0	\$0
Other (as needed)				0.00	\$0	\$0	\$0
Engineering/Construction				0.00	\$0	\$0	\$0
Land				0.00	\$0	n/a	\$0
Record Keeping System				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)	\$100	27-Feb-2020	27-Feb-2020	0.00	\$0	n/a	\$0
Notes for DELAYED costs	gas and liqui	d fuel usage for th	ne Dew Point He the Final Da	eater. T te is the	he Date Required e compliance date.		ompliance and
Avoided Costs	ANNU	ALIZE avoided c	osts before ei			one-time avoide	
Disposal				0.00	\$0	\$0	\$0
Personnel				0.00	\$0	\$0	\$0
Inspection/Reporting/Sampling				0.00	\$0	\$0	\$0
Supplies/Equipment				0.00	\$0	\$0	\$0
Financial Assurance				0.00	\$0	\$0	\$0
ONE-TIME avoided costs				0.00	\$0	\$0	\$0
Other (as needed)				0.00	\$0	\$0	\$0
Notes for AVOIDED costs							
Approx. Cost of Compliance		\$100			TOTAL		\$0

	L	conomic	Renetit	WO	rksheet		
Respondent	INEOS USA LL	.C (PCW No. 3 of	4)				
Case ID No.	60882						
Reg. Ent. Reference No.	RN100238708						
Media							Years of
Violation No.						Percent Interest	Depreciation
						5.0	15
	Item Cost	Date Required	Final Date	Yrs	Interest Saved	Costs Saved	EB Amount
Item Description							
•							
Delayed Costs							
Equipment				0.00	\$0	\$0	\$0
Buildings				0.00	\$0	\$0	\$0
Other (as needed)				0.00	\$0	\$0	\$0
Engineering/Construction				0.00	\$0	\$0	\$0
Land				0.00	\$0	n/a	\$0
Record Keeping System				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)	\$8,000	20-Feb-2020	1-Jul-2025	5.36	\$2.146	n/a	+0 116
,	40,000	20-160-2020	1 Jul 2023	3.30	\$2,140	n/a	\$2,146
Notes for DELAYED costs	Estimated co	st to conduct a st	ack test demor	strating of the n	compliance with t	the SO2 hourly MAE k test and the Final	R for Boiler 3,
Notes for DELAYED costs Avoided Costs	Estimated co EPN BLR3	est to conduct a st . The Date Requi	ack test demon red is the date estimate	strating of the ned date	g compliance with ton-compliant stack of compliance.	the SO2 hourly MAE	R for Boiler 3, Date is the
	Estimated co EPN BLR3	est to conduct a st . The Date Requi	ack test demon red is the date estimate	strating of the ned date ntering	g compliance with ton-compliant stack of compliance. item (except for \$0	the SO2 hourly MAE k test and the Final r one-time avoide \$0	R for Boiler 3, Date is the
Avoided Costs	Estimated co EPN BLR3	est to conduct a st . The Date Requi	ack test demon red is the date estimate	of the ned date ntering 0.00 0.00	compliance with to con-compliant stack of compliance. item (except for \$0 \$0	the SO2 hourly MAE k test and the Final r one-time avoider \$0 \$0	R for Boiler 3, Date is the d costs) \$0 \$0
Avoided Costs Disposal Personnel	Estimated co EPN BLR3	est to conduct a st . The Date Requi	ack test demon red is the date estimate	strating of the n ed date ntering 0.00 0.00 0.00	compliance with to con-compliant stack of compliance. item (except for \$0 \$0 \$0 \$0 \$0	the SO2 hourly MAE k test and the Final r one-time avoider \$0 \$0 \$0 \$0	R for Boiler 3, Date is the d costs) \$0 \$0
Avoided Costs Disposal Personnel	Estimated co EPN BLR3	est to conduct a st . The Date Requi	ack test demon red is the date estimate	strating of the n ed date ntering 0.00 0.00 0.00 0.00	g compliance with ton-compliant stack of compliance. item (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	the SO2 hourly MAE k test and the Final r one-time avoider \$0 \$0 \$0 \$0 \$0 \$0	R for Boiler 3, Date is the d costs) \$0 \$0 \$0 \$0
Avoided Costs Disposal Personnel nspection/Reporting/Sampling	Estimated co EPN BLR3	est to conduct a st . The Date Requi	ack test demon red is the date estimate	strating of the need date ntering 0.00 0.00 0.00 0.00 0.00 0.00 0.00 0.	compliance with toon-compliant stack of compliance. item (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	the SO2 hourly MAE k test and the Final r one-time avoided \$0 \$0 \$0 \$0 \$0 \$0	R for Boiler 3, Date is the d costs) \$0 \$0 \$0 \$0 \$0
Avoided Costs Disposal Personnel nspection/Reporting/Sampling Supplies/Equipment	Estimated co EPN BLR3	est to conduct a st . The Date Requi	ack test demon red is the date estimate	strating of the need date of the need da	compliance with to con-compliant stack of compliance. item (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	the SO2 hourly MAE k test and the Final r one-time avoided \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	R for Boiler 3, Date is the d costs) \$0 \$0 \$0 \$0 \$0 \$0
Avoided Costs Disposal Personnel Inspection/Reporting/Sampling Supplies/Equipment Financial Assurance	Estimated co EPN BLR3	est to conduct a st . The Date Requi	ack test demon red is the date estimate	strating of the need date ntering 0.00 0.00 0.00 0.00 0.00 0.00 0.00 0.	compliance with toon-compliant stack of compliance. item (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	the SO2 hourly MAE k test and the Final r one-time avoided \$0 \$0 \$0 \$0 \$0 \$0	R for Boiler 3, Date is the d costs) \$0 \$0 \$0 \$0 \$0
Avoided Costs Disposal Personnel Inspection/Reporting/Sampling Supplies/Equipment Financial Assurance ONE-TIME avoided costs	Estimated co EPN BLR3	est to conduct a st . The Date Requi	ack test demon red is the date estimate	strating of the need date of the need da	compliance with to con-compliant stack of compliance. item (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	the SO2 hourly MAE k test and the Final r one-time avoided \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	R for Boiler 3, Date is the d costs) \$0 \$0 \$0 \$0 \$0 \$0

	Scre	ening Date	8-Sep-2020	Docket No. 2021-0818-AIR-E	PCW
				(PCW No. 3 of 4)	Revision 4 (April 2014)
Dom		ase ID No.		PCW I	Revision March 26, 2014
Reg.	ent. Kei	erence No. Media	RN100238708		
	Enf. C		Danielle Porras		
		ation Number			
		Rule Cite(s)	30 Tex. Admir	. Code §§ 101.20(3), 116.115(c), and 122.143(4), NSR Permit Nos.	
				X854M2, SC No. 2, FOP No. O2327, GTC and STC No. 26, and Tex.	
				Health & Safety Code § 382.085(b)	
			Failed to prov	rent unauthorized emissions. Specifically, the Respondent released	
	Violatio	n Description		VOC as fugitive emissions, during an emissions event (Incident No.	
		•		that occurred on September 18, 2020 and lasted eight hours.	
				Base Penalty	\$25,000
_	_				
>> Env	vironme	ntal, Prope	rty and Hum	an Health Matrix Harm	
		Release	Major	Moderate Minor	
OR		Actual		X	
		Potential		Percent 15.0%	
> > D#0	a 12 m m 2	tic Matrix			
>>P10	gi allillia	tic Matrix Falsification	Major	Moderate Minor	
				Percent 0.0%	
					,
	Matrix			nent has been exposed to insignificant amounts of pollutants that did	
	Notes	not exceed lev	els that are pro	tective of human health or environmental receptors as a result of the	
				violation.	
				Adjustment \$21,250	
					\$3,750
Violatio	on Even	ts			
			,		
		Number of \	/iolation Events	1 Number of violation days	
			daily		
			weekly		
			monthly		
			quarterly	X Violation Base Penalty	\$3,750
			semiannual		
			annual single event		
			onigio ovene		
				One quarterly event is recommended.	
Good F	aith Eff	orts to Com	ply	10.0% Reduction	\$375
			The state of the s	efore NOE/NOV NOE/NOV to EDPRP/Settlement Offer	
			Extraordinary		
			Ordinary	X	
			N/A		
			Notes	The Respondent completed the corrective measures by	
				June 28, 2022, after the NOE dated December 18, 2020.	
			•	Walakian Cultural	#3 3 7 F
				Violation Subtotal	\$3,375
Econor	nic Bene	efit (EB) for	this violation	on Statutory Limit Test	
		Estimate	ed EB Amount	\$888 Violation Final Penalty Total	\$7,001
			/ount	•	
				This violation Final Assessed Penalty (adjusted for limits)	\$7,001

	E	conomic	Benefit	Wo	rksheet		
Respondent	INEOS USA LL	C (PCW No. 3 of	4)				
Case ID No.	60882						
Reg. Ent. Reference No.	RN100238708						
Media							Years of
Violation No.						Percent Interest	Depreciation
Violation No.						5.0	15
	Thomas Cook	Data Danvinad	Final Data	V	Tutawast Carrad		
		Date Required	Final Date	Yrs	Interest Saved	Costs Saved	EB Amount
Item Description							
Delayed Costs	T			7			
Equipment				0.00	\$0	\$0	\$0
Buildings				0.00	\$0	\$0	\$0
Other (as needed)				0.00	\$0	\$0	\$0
Engineering/Construction				0.00	\$0	\$0	\$0
Land				0.00	\$0 \$0	n/a	<u>\$0</u> \$0
Record Keeping System Training/Sampling				0.00	\$0	n/a n/a	\$0 \$0
Remediation/Disposal				0.00	\$0	n/a	\$0
Permit Costs				0.00	\$0	n/a	\$0
Other (as needed)	\$10,000	18-Sep-2020	28-1un-2022	1.78	\$888	n/a	\$888
,					6		
		•		-		unit, install new ver	
			•	, ,	, ,	nd add operator rou	
Notes for DELAYED costs		•				issions events due t	
	similar cause	s as Incident No.			•	the emissions event	occurred and
			the Final Date	e is the	date of compliance	?.	
Avoided Costs	ANNUA	ALTZE avoided c	osts hefore er	nterina	item (except for	one-time avoide	d costs)
Disposal	<u> </u>	I I	ooto belole el	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							
Notes for Avoided costs							
	•			-			
Approx. Cost of Compliance		\$10,000			TOTAL		+000
		\$10,000i			IUIAL		\$888



	E	conomic	Benefit	Wo	rksheet		
Respondent	INEOS USA LL	C (PCW No. 3 of	4)				
Case ID No.							
Reg. Ent. Reference No.	RN100238708	3					
Media	Air					Percent Interest	Years of
Violation No.	22					ı	Depreciation
						5.0	15
	Item Cost	Date Required	Final Date	Yrs	Interest Saved	Costs Saved	EB Amount
Item Description							
Delayed Costs							
Equipment				0.00	\$0	\$0	\$0
Buildings				0.00	\$0	\$0	\$0
Other (as needed)				0.00	\$0	\$0	\$0
Engineering/Construction				0.00	\$0	\$0	\$0
Land				0.00	\$0	n/a	\$0
Record Keeping System	\$1,500	2-Oct-2020	14-Jul-2023	2.78	\$209	n/a	\$209
Training/Sampling				0.00	\$0	n/a	\$0
Remediation/Disposal				0.00	\$0	n/a	\$0
Permit Costs				0.00	\$0	n/a	\$0
Other (as needed)				0.00	\$0	n/a	\$0
Notes for DELAYED costs	event in orde	r to ensure that a	ıll of the require	d inforn	nation is identified final record was du	iew for any reportab on the final records ue and the Final Date	for reportable
Avoided Costs	ANNU/	ALIZE avoided c	osts before er	ntering	item (except for	one-time avoide	d costs)
Disposal				0.00	\$0	\$0	\$0
Personnel				0.00	\$0	\$0	\$0
nspection/Reporting/Sampling				0.00	\$0	\$0	\$0
Supplies/Equipment				0.00	\$0	\$0	\$0
Financial Assurance				0.00	\$0	\$0	\$0
ONE-TIME avoided costs				0.00	\$0	\$0	\$0
				0.00	\$0	\$0	\$0
Other (as needed)				0.00	40		
Other (as needed) Notes for AVOIDED costs				<u> 0.00</u>	Ţ		

Dec Ent		8-Sep-2020	Docket No. 2021-0818-AIR-E	PCW
Dog End			(PCW No. 3 of 4) Policy	Revision 4 (April 2014)
	Case ID No		PCW I	Revision March 26, 2014
Keg. En	t. Reference No.			
	Media Inf. Coordinatoi			
-	Violation Number			
	Rule Cite(s)	\		1
	Rule energy	JO TEX. Admini	. Code §§ 101.20(3), 116.115(c), and 122.143(4), NSR Permit Nos. X854M2, SC No. 2, FOP No. O2327, GTC and STC No. 26, and Tex.	
		95 and P5D1.	Health & Safety Code § 382.085(b)	
			Treatile & Surety Code § 502.005(b)	
		Failed to prev	rent unauthorized emissions. Specifically, the Respondent released	
Vi	olation Description	77 184 97 lbs	of CO, 15,145.54 lbs of NOx, and 78,003.59 lbs of VOC from the No.	
V1	olation Description	2 Olerins Flare	e, EPN DDM-3101, during an emissions event (Incident No. 344750)	
			that began on October 24, 2020 and lasted 59 hours.	
				4
			Base Penalty	\$25,000
>> Enviso	nmontal Drone	white and Hiller	an Uasith Matrix	
>> ENVIFO	nmental, Prope	erty and Hum	an Health Matrix Harm	
	Release	e Major	Moderate Minor	
OR	Actua		X	
	Potentia		Percent 30.0%	
>>Progra	mmatic Matrix Falsification	Major	Moderate Minor	
	raisincation	Major	Percent 0.0%	
			refeelt 0.070	
	Based on the	Air Quality Analy	sis Audit performed on the air dispersion modeling that was provided	
м			ealth or the environment has been exposed to significant amounts of	
			ceed levels that are protective of human health or environmental	
			receptors as a result of the violation.	
				4
			Adjustment \$17,500	
				\$7,500
				7.7222
Violation	Events			
	Number of	Violation Events	1 Number of violation days	
	Number of	violation Events	1 Number of violation days	
		daily		
		weekly		
		monthly	Х	
		quarterly	Violation Base Penalty	47 500
		semiannual		\$7,500
				\$7,500
		annual		\$7,500
		annual single event		\$7,500
				\$7,500
			One monthly event is recommended.	\$7,500
			One monthly event is recommended.	\$7,500
Good Enit	h Efforts to Cor	single event		
Good Fait	h Efforts to Con	single event	10.0% Reduction	\$7,500 \$750
Good Fait	h Efforts to Con	single event	10.0% Reduction	
Good Fait	h Efforts to Con	single event	10.0% Reduction	
Good Fait	h Efforts to Con	single event nply Extraordinary	10.0% Reduction efore NOE/NOV NOE/NOV to EDPRP/Settlement Offer	
Good Fait	h Efforts to Con	single event nply Extraordinary Ordinary	10.0% Reduction efore NOE/NOV NOE/NOV to EDPRP/Settlement Offer x	
Good Fait	h Efforts to Con	single event nply Extraordinary Ordinary	10.0% Reduction efore NOE/NOV NOE/NOV to EDPRP/Settlement Offer x The Respondent completed the corrective measures on	
Good Fait	h Efforts to Con	nply Extraordinary Ordinary N/A	10.0% Reduction efore NOE/NOV NOE/NOV to EDPRP/Settlement Offer x	
Good Fait	h Efforts to Con	nply Extraordinary Ordinary N/A	The Respondent completed the corrective measures on August 31, 2021, after the NOE dated May 13, 2021.	\$750
		nply Extraordinary Ordinary N/A Notes	10.0% Reduction efore NOE/NOV NOE/NOV to EDPRP/Settlement Offer X The Respondent completed the corrective measures on August 31, 2021, after the NOE dated May 13, 2021. Violation Subtotal	
	h Efforts to Con	nply Extraordinary Ordinary N/A Notes	10.0% Reduction efore NOE/NOV NOE/NOV to EDPRP/Settlement Offer X The Respondent completed the corrective measures on August 31, 2021, after the NOE dated May 13, 2021. Violation Subtotal	\$750
	Benefit (EB) fo	nply Extraordinary Ordinary N/A Notes	10.0% Reduction efore NOE/NOV NOE/NOV to EDPRP/Settlement Offer X The Respondent completed the corrective measures on August 31, 2021, after the NOE dated May 13, 2021. Violation Subtotal	\$750
	Benefit (EB) fo	nply Extraordinary Ordinary N/A Notes	The Respondent completed the corrective measures on August 31, 2021, after the NOE dated May 13, 2021. Violation Subtotal on Statutory Limit Test	\$750 \$6,750 \$13,301

	E	conomic	Renetit	WO	rksneet		
Respondent	INEOS USA LL	.C (PCW No. 3 of	4)				
Case ID No.	60882						
Reg. Ent. Reference No.	RN100238708						
Media							Years of
Violation No.						Percent Interest	Depreciation
Violation No.	23					5.0	
				.,			15
		Date Required	Final Date	Yrs	Interest Saved	Costs Saved	EB Amount
Item Description							
Delayed Costs							
Equipment				0.00	\$0	\$0	\$0
Buildings				0.00	\$0	\$0	\$0
Other (as needed)				0.00	\$0	\$0	\$0
Engineering/Construction				0.00	\$0	\$0	\$0
Land				0.00	\$0	n/a	\$0
Record Keeping System				0.00	\$0	n/a	\$0
Training/Sampling				0.00	\$0	n/a	\$0
Remediation/Disposal				0.00	\$0	n/a	\$0
Permit Costs				0.00	\$0	n/a	\$0
Other (as needed)	\$10,000	24-Oct-2020		0.85	\$426	n/a	\$426
	Estimate	ed cost to add insp	pection of rack a	ind serv	vo linkage pins to t	he Maintenance Pre	eventative
Notes for DELAYED costs	Maintenance	Procedure in orde	er to prevent red	currenc	e to prevent the re	currence of emissic	ns events due
Notes for DELAYED Costs	to the same of	or similar causes a	as Incident No. 3	344750	. The Date Require	ed is the date the e	missions event
		beg	an and the Fina	l Date i	s the date of comp	oliance.	
Avoided Costs	ANNU	ALTZE avoided c	osts hefore en	terina	item (except for	one-time avoide	d costs)
Disposal				0.00	\$0	\$0	\$0
Personnel		İ		0.00	\$0	\$0	\$0
Inspection/Reporting/Sampling				0.00	\$0	\$0	\$0
Inspection/Reporting/Sampling Supplies/Equipment				0.00	\$0 \$0	\$0 \$0	\$0 \$0
. ,					\$0 \$0 \$0		\$0 \$0 \$0
Supplies/Equipment				0.00	\$0	\$0	\$0
Supplies/Equipment Financial Assurance				0.00	\$0 \$0	\$0 \$0	\$0 \$0
Supplies/Equipment Financial Assurance ONE-TIME avoided costs				0.00 0.00 0.00	\$0 \$0 \$0	\$0 \$0 \$0	\$0 \$0 \$0
Supplies/Equipment Financial Assurance ONE-TIME avoided costs Other (as needed)				0.00 0.00 0.00	\$0 \$0 \$0	\$0 \$0 \$0	\$0 \$0 \$0
Supplies/Equipment Financial Assurance ONE-TIME avoided costs				0.00 0.00 0.00	\$0 \$0 \$0	\$0 \$0 \$0	\$0 \$0 \$0
Supplies/Equipment Financial Assurance ONE-TIME avoided costs Other (as needed)				0.00 0.00 0.00	\$0 \$0 \$0	\$0 \$0 \$0	\$0 \$0 \$0
Supplies/Equipment Financial Assurance ONE-TIME avoided costs Other (as needed)				0.00 0.00 0.00	\$0 \$0 \$0	\$0 \$0 \$0	\$0 \$0 \$0
Supplies/Equipment Financial Assurance ONE-TIME avoided costs Other (as needed) Notes for AVOIDED costs				0.00 0.00 0.00	\$0 \$0 \$0 \$0	\$0 \$0 \$0 \$0	\$0 \$0 \$0 \$0
Supplies/Equipment Financial Assurance ONE-TIME avoided costs Other (as needed)		\$10,000		0.00 0.00 0.00	\$0 \$0 \$0	\$0 \$0 \$0 \$0	\$0 \$0 \$0

	E	conomic	Benefit	Wo	rksheet		
Respondent	INEOS USA LL	C (PCW No. 3 of	4)				
Case ID No.	60882						
Reg. Ent. Reference No.	RN100238708						
Media						Percent Interest	Years of
Violation No.	24					Percent Interest	Depreciation
						5.0	15
	Item Cost	Date Required	Final Date	Yrs	Interest Saved	Costs Saved	EB Amount
Item Description							
Delayed Costs							
Equipment				0.00	\$0	\$0	\$0
Buildings				0.00	\$0	\$0	\$0
Other (as needed)				0.00	\$0	\$0	\$0
Engineering/Construction				0.00	\$0	\$0	\$0
Land				0.00	\$0	n/a	\$0
Record Keeping System				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	1-Sep-2020	31-May-2021	0.75	\$373	n/a	\$373
Notes for DELAYED costs	Olefins 2 Fla Requ	re Routine, Startuired is the first da	up, Shutdown, a ate of non-comp	and Mair oliance a	ntenance Emissions and the Final Date	D, and NOx annual Nox, EPN DDM-3101MS is the date of compl	SS. The Date iance.
Avoided Costs	ANNU	ALIZE avoided o	osts before er			one-time avoide	
Disposal				0.00	\$0	\$0	\$0
Personnel				0.00	\$0	\$0 \$0	\$0 \$0
Inspection/Reporting/Sampling				0.00	\$0 \$0	\$0 \$0	\$0 \$0
Supplies/Equipment				0.00	\$0 \$0	\$0 \$0	
Financial Assurance ONE-TIME avoided costs				0.00	\$0	\$0	\$0 \$0
				0.00	\$0	\$0	\$0
Other (as needed) Notes for AVOIDED costs		<u> </u>		<u> 0.00</u>	1 50	Φ0	\$0
Approx. Cost of Compliance		\$10,000			TOTAL		\$373

		ening Date			cket No. 2021-0818-AIR-E	PCW
	F	Respondent	INEOS USA LLC	(PCW No. 3 of 4)		Policy Revision 4 (April 2014)
	(Case ID No.	60882			PCW Revision March 26, 2014
Reg.	Ent. Ref		RN100238708			
		Media				
			Danielle Porras	1		
	Viol	ation Number				
		Rule Cite(s)			2), and (3), 113.100, 116.115(c), ar	
					d 63.11(b)(6)(ii), NSR Permit Nos. 9 327, GTC and STC Nos. 1.A. and 26,	
			P3D1X634M2	Tex. Health & Safety		allu
				,	5 ()	
					of the gas being combusted at 300 Bi	
					air-assisted. Specifically, the net he No. 1 Olefins Facilities Flare was less	<u> </u>
	Violatio	n Description			anged from 0.00 Btu/scf to 299.77 B	
					from October 1, 2019 to September	
				202	20.	
					Base Pe	enalty \$25,000
>> Env	vironme	ntai, Prope	rty and Hum	an Health Matrix		
		Release	Major	Moderate Minor		
OR		Actual		X		
		Potential			Percent 15.0%	
>>Pro	gramma	tic Matrix	Marian	Madauaka		
		Falsification	Major	Moderate Minor	Percent 0.0%	
					Percent 0.0%	
		Human health	or the environr	nent has been exposed to i	nsignificant amounts of pollutants th	at did
	Matrix				environmental receptors as a result	
	Notes		, , , , , , , , , , , , , , , , , , ,	violation.		
					Adjustment \$2	21,250
						\$3,750
						ψ3,730
Violatio	on Even	ts				
			<u>-</u> . [
		number or	Violation Events	4	Number of violation days	
			daily			
			weekly			
			monthly			
			quarterly	Х	Violation Base Pe	enalty \$15,000
			semiannual			
						,
			annual			, , ,
			annual single event			
		Four quarter	single event		es of non-compliance that occurred	
		Four quarter	single event	commended for the instance October 1, 2019 to Septemb	•	
			single event	October 1, 2019 to Septemb	per 30, 2020.	from
Good F	aith Eff	Four quarter	single event	25.0%	per 30, 2020. Red	
Good F	aith Eff		single event	25.0%	per 30, 2020.	from
Good F	aith Eff		single event ly events are reconnected apply Extraordinary	25.0% efore NOE/NOV to ED	per 30, 2020. Red	from
Good F	aith Eff		single event ly events are reconstruction aply Extraordinary Ordinary	25.0%	per 30, 2020. Red	from
Good F	aith Eff		single event ly events are reconnected apply Extraordinary	25.0% NOE/NOV to ED	PRP/Settlement Offer	from
Good F	aith Eff		single event ly events are reconstruction aply Extraordinary Ordinary	25.0% efore NOE/NOV NOE/NOV to ED X The Respondent complete	per 30, 2020. Red	from
Good F	aith Eff		single event ly events are reconstruction aply Extraordinary Ordinary N/A	25.0% efore NOE/NOV NOE/NOV to ED x The Respondent complete September 30, 2020, pri	PRP/Settlement Offer ed the corrective measures on	from
Good F	aith Eff		single event ly events are reconstruction aply Extraordinary Ordinary N/A	25.0% efore NOE/NOV NOE/NOV to ED x The Respondent complete September 30, 2020, pri	PRP/Settlement Offer ed the corrective measures on for to the NOE dated May 27, 2021.	from \$3,750
Good F	aith Eff		single event ly events are reconstruction aply Extraordinary Ordinary N/A	25.0% efore NOE/NOV NOE/NOV to ED x The Respondent complete September 30, 2020, pri	PRP/Settlement Offer ed the corrective measures on ior to the NOE dated May 27,	from \$3,750
		orts to Com	single event ly events are reconstruction aply Extraordinary Ordinary N/A	25.0% efore NOE/NOV NOE/NOV to ED X The Respondent complete September 30, 2020, pri	PRP/Settlement Offer ed the corrective measures on for to the NOE dated May 27, 2021.	from \$3,750 uction \$11,250
		orts to Com	single event ly events are reconstruction aply Extraordinary Ordinary N/A Notes	25.0% efore NOE/NOV NOE/NOV to ED x The Respondent complete September 30, 2020, pri	Red OPRP/Settlement Offer and the corrective measures on for to the NOE dated May 27, 2021. Violation Sul Statutory Limit Te	\$3,750 \$3,750 \$11,250 \$11,250 \$1
		orts to Com	single event rly events are reconstruction ply B Extraordinary Ordinary N/A Notes	25.0% efore NOE/NOV NOE/NOV to ED X The Respondent complete September 30, 2020, pri	PREP/Settlement Offer and the corrective measures on lor to the NOE dated May 27, 2021. Violation Sul	\$3,750 \$3,750 \$11,250 \$11,250 \$1
		orts to Com	single event ly events are reconstruction aply Extraordinary Ordinary N/A Notes	25.0% efore NOE/NOV NOE/NOV to ED X The Respondent complete September 30, 2020, pri	Red OPRP/Settlement Offer and the corrective measures on for to the NOE dated May 27, 2021. Violation Sul Statutory Limit Te	\$3,750 \$3,750 \$11,250 \$11,250 \$15t \$23,651

	E	conomic	Renetit	WO	rksneet										
Respondent	INEOS USA LL	.C (PCW No. 3 of	4)												
Case ID No.	60882														
Reg. Ent. Reference No.	RN100238708														
Media							Years of								
Violation No.						Percent Interest	Depreciation								
Violation ito.	25					F 0									
						5.0	15								
	Item Cost	Date Required	Final Date	Yrs	Interest Saved	Costs Saved	EB Amount								
Item Description															
Delayed Costs															
Equipment				0.00	\$0	\$0	\$0								
Buildings				0.00	\$0	\$0	\$0								
Other (as needed)				0.00	\$0	\$0	\$0								
Engineering/Construction				0.00	\$0	\$0	\$0								
Land				0.00	\$0	n/a	\$0								
Record Keeping System				0.00	\$0	n/a	\$0								
Training/Sampling				0.00	\$0	n/a	\$0								
Remediation/Disposal				0.00	\$0	n/a	\$0								
Permit Costs				0.00	\$0	n/a	\$0								
Other (as needed)	\$1,500	1-Oct-2019	30-Sep-2020	1.00	\$75	n/a	\$75								
Notes for DELAYED costs		compl	iance and the F	inal Dat	ce is the date of co	<u>'</u>	t date of non-								
Avoided Costs	ANNUA	ALIZE avoided c	osts before er	iterina	item (except for	Avoided Costs ANNUALIZE avoided costs before entering item (except for one-time avoided costs)									
Disposal	1														
				0.00	\$0	\$0	\$0								
Personnel				0.00	\$0 \$0	\$0 \$0	\$0 \$0								
nspection/Reporting/Sampling				0.00 0.00 0.00	\$0 \$0 \$0	\$0 \$0 \$0	\$0 \$0 \$0								
nspection/Reporting/Sampling Supplies/Equipment				0.00 0.00 0.00 0.00	\$0 \$0 \$0 \$0 \$0	\$0 \$0 \$0 \$0	\$0 \$0 \$0 \$0								
Inspection/Reporting/Sampling Supplies/Equipment Financial Assurance				0.00 0.00 0.00 0.00	\$0 \$0 \$0 \$0 \$0 \$0	\$0 \$0 \$0 \$0 \$0 \$0	\$0 \$0 \$0 \$0 \$0								
nspection/Reporting/Sampling Supplies/Equipment Financial Assurance ONE-TIME avoided costs				0.00 0.00 0.00 0.00 0.00	\$0 \$0 \$0 \$0 \$0 \$0 \$0	\$0 \$0 \$0 \$0 \$0 \$0 \$0	\$0 \$0 \$0 \$0 \$0 \$0 \$0								
nspection/Reporting/Sampling Supplies/Equipment Financial Assurance				0.00 0.00 0.00 0.00	\$0 \$0 \$0 \$0 \$0 \$0	\$0 \$0 \$0 \$0 \$0 \$0	\$0 \$0 \$0 \$0 \$0								
inspection/Reporting/Sampling Supplies/Equipment Financial Assurance ONE-TIME avoided costs				0.00 0.00 0.00 0.00 0.00	\$0 \$0 \$0 \$0 \$0 \$0 \$0	\$0 \$0 \$0 \$0 \$0 \$0 \$0	\$0 \$0 \$0 \$0 \$0 \$0 \$0								

	Scre	ening Date	8-Sep-2020	Docket No. 2021-0818-AIR-E	PCW
				(PCW No. 3 of 4)	Policy Revision 4 (April 2014)
D		ase ID No.			PCW Revision March 26, 2014
кед.	Ent. Ket	erence No. Media	RN100238708		
	Fnf. C		Danielle Porras		
		tion Number			
		Rule Cite(s)	30 Tex Admi	n. Code §§ 115.725(a)(2)(D) and 122.143(4), FOP No. O2327, G	STC
				STC No. 1.A., and Tex. Health & Safety Code § 382.085(b)	
			Failed to com	ply with the operating parameter limit. Specifically, the Respond	ent
	Violatio	n Description		n the established operating parameter limit of at least 2.6% O2	
				en level ranged from 0.00% to 2.598% for a total of 677 hours o	
			uays II oiii	October 1, 2019 to January 12, 2020 for the No. 1 Olefins Boiler.	•
				Base Per	salty \$25,000
>> Env	/ironme	ntal. Prope	rtv and Hum	an Health Matrix	
			_	Harm	
O.D.		Release	Major	Moderate Minor	
OR		Actual Potential		Percent 15.0%	
		rotential		recent 15.0%	
>>Prog	gramma	tic Matrix			
		Falsification	Major	Moderate Minor	
				Percent 0.0%	
		Human health	or the environr	nent has been exposed to insignificant amounts of pollutants tha	t did
	Matrix			tective of human health or environmental receptors as a result o	
	Notes			violation.	
					252
				Adjustment \$21	,250
					\$3,750
\/:-I-+:	-	. _			
violatio	on Even	ts .			
		Number of \	/iolation Events	2 49 Number of violation days	
			daily		
			weekly monthly		
			quarterly	X Violation Base Per	alty \$7,500
			semiannual		-
			annual		
			single event		
		Two quarter	ly events are re	commended for the instances of non-compliance that occurred from October 1, 2019 to January 12, 2020.	om
				October 1, 2015 to Junuary 12, 2020.	
Good F	aith Fff	orts to Com	nly	25.0% Reduc	ction \$1,875
Good I	aitii Lii	ores to com		efore NOE/NOV NOE/NOV to EDPRP/Settlement Offer	\$1,073
			Extraordinary		
			Ordinary	Х	
			N/A		
				The Respondent competed the corrective measures on	
			Notes	January 12, 2020, prior to the NOE dated May 27, 2021.	
			ı		
				Violation Sub	total \$5,625
Econon	nic Bene	efit (EB) for	this violation	on Statutory Limit Tes	t
			ed EB Amount	\$21 Violation Final Penalty 1	
		Estillati	Amount		
				This violation Final Assessed Penalty (adjusted for lin	nits) \$12,176

	E	conomic	Benefit	Wo	rksheet		
Respondent	INEOS USA LL	C (PCW No. 3 of	4)				
Case ID No.							
Reg. Ent. Reference No.	RN100238708	3					
Media						Percent Interest	Years of
Violation No.	26					Percent Interest	Depreciation
						5.0	15
	Item Cost	Date Required	Final Date	Yrs	Interest Saved	Costs Saved	EB Amount
Item Description							
Delayed Costs							
Equipment				0.00	\$0	\$0	\$0
Buildings				0.00	\$0	\$0	\$0
Other (as needed)				0.00	\$0	\$0	\$0
Engineering/Construction				0.00	\$0	\$0	\$0
Land				0.00	\$0	n/a	\$0
Record Keeping System				0.00	\$0	n/a	\$0
Training/Sampling				0.00	\$0	n/a	\$0
Remediation/Disposal				0.00	\$0	n/a	\$0
Permit Costs				0.00	\$0	n/a	\$0
Other (as needed)	\$1,500	1-Oct-2019	12-Jan-2020	0.28	\$21	n/a	\$21
	Estimated co	st to raise the oxy	vaen level for th	e No. 1	Olefins Boiler in o	rder to comply with	the operating
Notes for DELAYED costs			, ,			st date of non-comp	
	parameter iii	0. 40.0450 2.0			ate of compliance.		marroe arra erre
					'		
Avoided Costs	ANNU	ALIZE avoided c	osts before er	tering	item (except for	one-time avoide	d costs)
Disposal				0.00	\$0	\$0	\$0
Personnel				0.00	\$0	\$0	\$0
Inspection/Reporting/Sampling				0.00	\$0	\$0	\$0
Supplies/Equipment				0.00	\$0	\$0	\$0
Financial Assurance				0.00	\$0	\$0	\$0
ONE-TIME avoided costs				0.00	\$0	\$0	\$0
Other (as needed)				0.00	\$0	\$0	\$0
Notes for AVOIDED costs							

		ening Date		Docket No. 2021-0818-AIR-E	PCW
		lespondent Case ID No.			icy Revision 4 (April 2014) / Revision March 26, 2014
Reg.		erence No.	RN100238708	,.,	Revision Flaren 20, 2011
	Enf C	Media	Air Danielle Porras		
		ation Number			
			30 Tex. Admin.	Code §§ 116.115(c), 117.310(c)(2)(B), and 122.143(4), NSR Perm	
			No. 97769, SC	C No. 5.F., FOP No. O2327, GTC and STC Nos. 1.A. and 26, and Tex. Health & Safety Code § 382.085(b)	
				Health & Safety Code & 362.063(b)	
				y with the concentration limit. Specifically, the Respondent exceede	
	Violatio	n Description		ntration limit of 10 ppmvd corrected to 3.0% O2 based on a rolling 2 g period by a range from 0.75 ppmvd to 144.99 ppmvd for a total of	
			14 hours	s on October 16, 2019 and April 11, 2020 for Furnace No. 105.	
					4
				Base Penalt	y \$25,000
>> Env	vironme	ntal, Prope	rty and Hum	an Health Matrix	
		Release	Major	Harm Moderate Minor	
OR		Actual		X	
		Potential		Percent 15.0%	
>>Pro	gramma	tic Matrix			
		Falsification	Major	Moderate Minor	
				Percent 0.0%	
	Matuis	Human health	or the environr	nent has been exposed to insignificant amounts of pollutants that di	d
	Matrix Notes	not exceed lev	els that are pro	tective of human health or environmental receptors as a result of th	<mark>e</mark>
				violation.	
				Adjustment \$21,25	0
					\$3,750
Violetia	on Even	t-a			
violatio	on Even	ts			
		Number of \	/iolation Events	2 Number of violation days	
			daily		
			weekly		
			monthly quarterly	X Violation Base Penalt	y \$7,500
			semiannual	Violation base remain	y
			annual		
			single event		
		Two quarte	rly events are r	ecommended for the instances of non-compliance that occurred on	
		quui co	n, evente are n	October 16, 2019 and April 11, 2020.	
					+4.075
Good F	aith Eff	orts to Com		25.0% Reductio efore NOE/NOV NOE/NOV to EDPRP/Settlement Offer	n \$1,875
			Extraordinary		
			Ordinary	X	
			N/A		
			Notes	The Respondent completed the corrective measures on April 11, 2020, prior to the NOE dated May 27, 2021.	
				Violation Subtota	s5,625
Econon	nic Bene	efit (EB) for	this violation	on Statutory Limit Test	
		Estimate	ed EB Amount	\$244 Violation Final Penalty Tota	s12,176
				This violation Final Assessed Penalty (adjusted for limits	
				ims violation i mai Assesseu renaity (aujusteu ioi illillits	φ12,170

	E(conomic	Benefit	Wo	rksheet		
Respondent	INEOS USA LL	.C (PCW No. 3 of	4)				
Case ID No.	60882						
eg. Ent. Reference No.	RN100238708						
Media Violation No.						Percent Interest	Years of Depreciation
						5.0	15
	Item Cost	Date Required	Final Date	Yrs	Interest Saved	Costs Saved	EB Amount
Item Description							
•							
Delayed Costs							
Equipment				0.00	\$0	\$0	\$0
Buildings				0.00	\$0	\$0	\$0
Other (as needed)				0.00	\$0	\$0	\$0
Engineering/Construction				0.00	\$0	\$0	\$0
Land				0.00	\$0	n/a	\$0
Record Keeping System				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	16-Oct-2019	11-Apr-2020	0.49	\$244	n/a	\$244
							7
Notes for DELAYED costs	105. The Da	te Required is the	e first date of no	n-comp	pliance and the Fin	concentration limit f	of compliance.
Avoided Costs	105. The Da	te Required is the	e first date of no	n-comp	item (except for	al Date is the date or one-time avoide	of compliance. d costs)
Avoided Costs Disposal	105. The Da	te Required is the	e first date of no	tering 0.00	item (except for	al Date is the date of rone-time avoider \$0	of compliance. d costs) \$0
Avoided Costs Disposal Personnel	105. The Da	te Required is the	e first date of no	tering 0.00 0.00	item (except for \$0 \$0	r one-time avoide	of compliance. d costs) \$0 \$0
Avoided Costs Disposal Personnel espection/Reporting/Sampling	105. The Da	te Required is the	e first date of no	tering 0.00 0.00 0.00	item (except for \$0 \$0 \$0 \$0	r one-time avoider \$0 \$0 \$0	of compliance. d costs) \$0 \$0 \$0
Avoided Costs Disposal Personnel spection/Reporting/Sampling Supplies/Equipment	105. The Da	te Required is the	e first date of no	n-comp 0.00 0.00 0.00 0.00	item (except for \$0 \$0 \$0 \$0 \$0 \$0	r one-time avoider \$0 \$0 \$0 \$0 \$0	of compliance. d costs) \$0 \$0 \$0 \$0
Avoided Costs Disposal Personnel spection/Reporting/Sampling Supplies/Equipment Financial Assurance	105. The Da	te Required is the	e first date of no	n-comp 0.00 0.00 0.00 0.00 0.00	item (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	r one-time avoide \$0 \$0 \$0 \$0 \$0 \$0 \$0	of compliance. d costs) \$0 \$0 \$0 \$0 \$0
Avoided Costs Disposal Personnel spection/Reporting/Sampling Supplies/Equipment Financial Assurance ONE-TIME avoided costs	105. The Da	te Required is the	e first date of no	tering 0.00 0.00 0.00 0.00 0.00 0.00 0.00	item (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	r one-time avoide \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	of compliance. d costs) \$0 \$0 \$0 \$0 \$0 \$0
Avoided Costs Disposal Personnel spection/Reporting/Sampling Supplies/Equipment Financial Assurance	105. The Da	te Required is the	e first date of no	n-comp 0.00 0.00 0.00 0.00 0.00	item (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	r one-time avoide \$0 \$0 \$0 \$0 \$0 \$0 \$0	of compliance. d costs) \$0 \$0 \$0 \$0 \$0
Avoided Costs Disposal Personnel spection/Reporting/Sampling Supplies/Equipment Financial Assurance ONE-TIME avoided costs	105. The Da	te Required is the	e first date of no	tering 0.00 0.00 0.00 0.00 0.00 0.00 0.00	item (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	r one-time avoide \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	of compliance. d costs) \$0 \$0 \$0 \$0 \$0 \$0

		ening Date			Docket No. 2021-0818-AIR-E		PCW
				(PCW No. 3 of 4)		Policy	Revision 4 (April 2014)
D		ase ID No.				PCW R	evision March 26, 2014
Reg.	Ent. Ker	erence No. Media	RN100238708				
	Enf. C		Danielle Porras				
		ation Number					
		Rule Cite(s)	30 Tex. Admin.	Code §§ 116,115(c) ar	nd 122.143(4), NSR Permit No. 977	69, SC No.	
			5.F., FOP N	o. 02327, GTC and ST0	C No. 26, and Tex. Health & Safety	Code §	
				38	32.085(b)		
					n limit. Specifically, the Respondent ppmvd corrected to 3% O2 on an ho		
	Violatio	n Description			.66 ppmvd for a total of 15 hours or	-	
					ugust 22, 2020 for Furnace No. 105		
					Ras	e Penalty	\$25,000
					Dus	c i charty	Ψ23,000
>> Env	/ironme	ntal, Prope	rty and Hum	an Health Matrix			
		Release	Major	Harm Moderate Minor			
OR		Actual		Moderate Millor			
		Potential			Percent 15.0%		
			<u> </u>	-			
>>Prog	gramma	tic Matrix					
		Falsification	Major	Moderate Minor	D		
					Percent 0.0%		
		Human hoalth	or the environm	ant has been evened	to insignificant amounts of pollutan	to that did	
	Matrix			•	n or environmental receptors as a re		
	Notes	not exceed ie	veis that are pro	violation	·	Suit of the	
					Adjustment	\$21,250	
						Г	\$3,750
						L	\$3,730
Violatio	on Event	ts					
		Number of \	Violation Events	3	5 Number of violation	days	
			daily				
			weekly				
			monthly				
			quarterly	Х	Violation Bas	e Penalty	\$11,250
			semiannual				
			annual				
			single event				
		Three quarte	rly events are re		stances of non-compliance that occu	rred from	
				October 15, 2019 to A	ugust 22, 2020.		
	=						+2.012
G000 F	aith Effe	orts to Com		25.0% NOE/NOV NOE/NOV	to EDPRP/Settlement Offer	Reduction	\$2,812
			Extraordinary	erore mozymov	to Estat/Sectioneric orien		
			Ordinary	Х			
			N/A				
				The Deener deet com			
			Notes		pleted the corrective measures on r to the NOE dated May 27, 2021.		
				guot ==, 2020, prio	27, 2021		
					Violation	Subtotal	\$8,438
					Violation	Jubiolal	90,430
Econon	nic Bene	efit (EB) for	this violation	on	Statutory Limit	t Test	
		Estimate	ed EB Amount	\$4	27 Violation Final Pen	alty Total	\$17,914
				·			
					nal Assessed Penalty (adjusted f	or limite)	\$17,914

	E	conomic	Benefit	Wo	rksheet		
Respondent	INEOS USA LL	.C (PCW No. 3 of	4)				
Case ID No.							
Reg. Ent. Reference No.	RN100238708						
Media	Air					Percent Interest	Years of
Violation No.	28					T Crodine Interest	Depreciation
						5.0	15
	Item Cost	Date Required	Final Date	Yrs	Interest Saved	Costs Saved	EB Amount
Item Description							
Delayed Costs				_			
Equipment				0.00	\$0	\$0	\$0
Buildings				0.00	\$0	\$0	\$0
Other (as needed)				0.00	\$0	\$0	\$0
Engineering/Construction				0.00	\$0	\$0	\$0
Land				0.00	\$0	n/a	\$0
Record Keeping System				0.00	\$0	n/a	\$0
Training/Sampling				0.00	\$0	n/a	\$0
Remediation/Disposal				0.00	\$0	n/a	\$0
Permit Costs	110.000	15.0 : 0010		0.00	\$0	n/a	\$0
Other (as needed)	\$10,000	15-Oct-2019	22-Aug-2020	0.85	\$427	n/a	\$427
Notes for DELAYED costs					ion-compliance and	slip concentration li d the Final Date is tl	
Avoided Costs	ANNU	ALIZE avoided c	osts before er			one-time avoide	d costs)
Disposal				0.00	\$0	\$0	\$0
Personnel				0.00	\$0	\$0	\$0
Inspection/Reporting/Sampling				0.00	\$0	\$0	\$0
Supplies/Equipment				0.00	\$0	\$0	\$0
Financial Assurance				0.00	\$0	\$0	\$0
ONE-TIME avoided costs				0.00	\$0	\$0	\$0
Other (as needed)				0.00	\$0	\$0	\$0
Notes for AVOIDED costs							
Approx. Cost of Compliance		\$10,000			TOTAL		\$427

	56.6	ening Date	6-3ep-2020	Docket No. 2021-0818-AIR-E	PCW
	R	espondent	INEOS USA LLO	C (PCW No. 3 of 4)	olicy Revision 4 (April 2014)
		ase ID No.		PC	CW Revision March 26, 2014
Reg.	Ent. Ref	erence No.	RN100238708		
		Media			
			Danielle Porras		
	Viola	ition Number			
		Rule Cite(s)		n. Code §§ $116.115(c)$ and $122.143(4)$, NSR Permit No. 101 , SC No.	
			3.B.(3), FOP	No. 02327, GTC and STC No. 26, and Tex. Health & Safety Code §	
				382.085(b)	
			Failed to comp	ly with the firing rate limit. Specifically, the Respondent exceeded t	<mark>:he</mark>
	Violatio	n Description		of 388 million British thermal units per hour ("MMBtu/hr") by a ran	
			from 0.06 MI	MBtu/hr to 28.35 MMBtu/hr for a total of 227 hours on 13 days from	1
			October .	1, 2019 to April 19, 2020 for the No. 2 Olefins Unit Steam Boiler.	
				Base Pena	lty \$25,000
				2435 / 5/14	Ψ25/000
>> Env	vironme	ntal, Prope	rty and Hun	nan Health Matrix	
				Harm	
00		Release		Moderate Minor	
OR		Actual		X	
		Potential		Percent 15.0%	
>> Dro	aramma	tic Matrix			
PIO	yı aililli	Falsification	Major	Moderate Minor	
		Taisincation	Hajoi	Percent 0.0%	
				0.070	
		Human health	or the environ	ment has been exposed to insignificant amounts of pollutants that	lid
	Matrix			otective of human health or environmental receptors as a result of t	
	Notes			violation.	
				Adjustment \$21,2	50
					\$3,750
					ψ5/.50
Violati	on Evon	ha.			497, 33
Violatio	on Even	ts			43,730
Violatio	on Even		Violation Events	Number of violation days	45,755
Violatio	on Even		Violation Events	2 Number of violation days	ψο,σο
Violatio	on Even		/iolation Events	2 13 Number of violation days	ψο,σ
Violatio	on Even			2 Number of violation days	ψο,σ
Violatio	on Even		daily	2 Number of violation days	ψο,σ
Violation	on Even		daily weekly	2 13 Number of violation days X Violation Base Pena	
Violatio	on Even		daily weekly monthly		
Violatio	on Even		daily weekly monthly quarterly		
Violatio	on Even		daily weekly monthly quarterly semiannual		
Violatio	on Even		daily weekly monthly quarterly semiannual annual		
Violatio	on Even	Number of \	daily weekly monthly quarterly semiannual annual single event		ty \$7,500
Violatio	on Even	Number of \	daily weekly monthly quarterly semiannual annual single event	Violation Base Pena	ty \$7,500
Violatio	on Even	Number of \	daily weekly monthly quarterly semiannual annual single event	Violation Base Pena commended for the instances of non-compliance that occurred from	ty \$7,500
		Number of N	daily weekly monthly quarterly semiannual annual single event	Violation Base Pena commended for the instances of non-compliance that occurred from	\$7,500
		Number of \	daily weekly monthly quarterly semiannual annual single event	Violation Base Pena Commended for the instances of non-compliance that occurred from October 1, 2019 to April 19, 2020.	\$7,500
		Number of N	daily weekly monthly quarterly semiannual annual single event	Violation Base Pena Commended for the instances of non-compliance that occurred from October 1, 2019 to April 19, 2020. Reducti	\$7,500
		Number of N	daily weekly monthly quarterly semiannual annual single event	Violation Base Pena Commended for the instances of non-compliance that occurred from October 1, 2019 to April 19, 2020. Reducti	\$7,500
		Number of N	daily weekly monthly quarterly semiannual annual single event ly events are re	Commended for the instances of non-compliance that occurred from October 1, 2019 to April 19, 2020. 25.0% Reduction Base Pena NOE/NOV NOE/NOV to EDPRP/Settlement Offer X	\$7,500
		Number of N	daily weekly monthly quarterly semiannual annual single event ly events are re extraordinary Ordinary	violation Base Pena Commended for the instances of non-compliance that occurred from October 1, 2019 to April 19, 2020. 25.0% Reduction Base Pena NOE/NOV NOE/NOV to EDPRP/Settlement Offer X	\$7,500
		Number of N	daily weekly monthly quarterly semiannual annual single event ly events are re extraordinary Ordinary	violation Base Pena Violation Base Pena Commended for the instances of non-compliance that occurred from October 1, 2019 to April 19, 2020. Reduction Base Pena The Respondent completed the corrective measures on	\$7,500
		Number of N	daily weekly monthly quarterly semiannual annual single event ly events are re Extraordinary Ordinary N/A	Commended for the instances of non-compliance that occurred from October 1, 2019 to April 19, 2020. 25.0% Reduction Base Pena The Respondent completed the corrective measures on	\$7,500
		Number of N	daily weekly monthly quarterly semiannual annual single event ly events are re Extraordinary Ordinary N/A	x Violation Base Pena Commended for the instances of non-compliance that occurred from October 1, 2019 to April 19, 2020. 25.0% Reduction Base Pena The Respondent completed the corrective measures on April 19, 2020, prior to the NOE dated May 27, 2021.	sty \$7,500
		Number of N	daily weekly monthly quarterly semiannual annual single event ly events are re Extraordinary Ordinary N/A	violation Base Pena Violation Base Pena Commended for the instances of non-compliance that occurred from October 1, 2019 to April 19, 2020. Reduction Base Pena The Respondent completed the corrective measures on	sty \$7,500
Good F	aith Effe	Number of Number	daily weekly monthly quarterly semiannual annual single event y events are re Extraordinary Ordinary N/A Notes	Commended for the instances of non-compliance that occurred from October 1, 2019 to April 19, 2020. 25.0% Reduction Subtomark of the instances of non-compliance that occurred from October 1, 2019 to April 19, 2020. Reduction Subtomark of the Respondent completed the corrective measures on April 19, 2020, prior to the NOE dated May 27, 2021. Violation Subtomark of the Subtomark of the Subtomark of Subt	sty \$7,500
Good F	aith Effe	Number of Number	daily weekly monthly quarterly semiannual annual single event ly events are re Extraordinary Ordinary N/A	Commended for the instances of non-compliance that occurred from October 1, 2019 to April 19, 2020. 25.0% Reduction Base Pena The Respondent completed the corrective measures on April 19, 2020, prior to the NOE dated May 27, 2021. Violation Subtoon Statutory Limit Test	sty \$7,500
Good F	aith Effe	Two quarter	daily weekly monthly quarterly semiannual annual single event y events are re Extraordinary Ordinary N/A Notes	Commended for the instances of non-compliance that occurred from October 1, 2019 to April 19, 2020. 25.0% Sefore NOE/NOV NOE/NOV to EDPRP/Settlement Offer X The Respondent completed the corrective measures on April 19, 2020, prior to the NOE dated May 27, 2021. Violation Subtoon Statutory Limit Test	stal \$5,625
Good F	aith Effe	Two quarter	daily weekly monthly quarterly semiannual annual single event ly events are re Extraordinary Ordinary N/A Notes	Commended for the instances of non-compliance that occurred from October 1, 2019 to April 19, 2020. 25.0% Reduction Base Pena The Respondent completed the corrective measures on April 19, 2020, prior to the NOE dated May 27, 2021. Violation Subtoon Statutory Limit Test	\$7,500 \$7,500 \$1,875 \$

		conomic		Wo	rksheet		
Respondent Case ID No. Reg. Ent. Reference No.	60882	.C (PCW No. 3 of 4	4)				
Media Violation No.	Air					Percent Interest	Years of Depreciation
						5.0	15
	Item Cost	Date Required	Final Date	Yrs	Interest Saved	Costs Saved	EB Amount
Item Description							
Delayed Costs				_			
Equipment				0.00	\$0	\$0	\$0
Buildings				0.00	\$0	\$0	\$0
Other (as needed)				0.00	\$0	\$0	\$0
Engineering/Construction				0.00	\$0	\$0	\$0
Land				0.00	\$0	n/a	\$0
Record Keeping System				0.00	\$0	n/a	\$0
Training/Sampling				0.00	\$0	n/a	\$0
Remediation/Disposal				0.00	\$0	n/a	\$0
Permit Costs Other (as needed)	\$10,000	1-Oct-2019	19-Apr-2020	0.00	\$0 \$275	n/a n/a	<u>\$0</u> \$275
Notes for DELAYED costs					e of non-complianc	ng rate limit for the e and the Final Date	
Avoided Costs	ANNU/	ALIZE avoided c	osts before en	tering	item (except for	one-time avoide	d costs)
Disposal				0.00	\$0	\$0	\$0
Personnel				0.00	\$0	\$0	\$0
spection/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)	ļ			0.00	\$0	\$0	\$0
Notes for AVOIDED costs							

	Scre	ening Date	8-Sep-2020	Docket No. 2021-0818-AIR-E	PCW
	R	espondent	INEOS USA LLC	(PCW No. 3 of 4)	olicy Revision 4 (April 2014)
		ase ID No.		PC	CW Revision March 26, 2014
Reg.	Ent. Ref		RN100238708		
		Media			
		oordinator ation Number	Danielle Porras		
	VIOI	Rule Cite(s)			
		Rule Cite(S)	56 . 67 7	. Code §§ 117.310(c)(2) and 122.143(4), FOP No. O2327, GTC ar C No. 1.A., and Tex. Health & Safety Code § 382.085(b)	d
	Violatio	n Description	the NH3 cond	with the concentration limit. Specifically, the Respondent exceed tentration limit of 10 ppmvd corrected at 3.0% O2 by a range from the 262.37 ppmvd for a total of seven hours on August 27, 2020 and August 29, 2020 for the Steam Cracking Furnace.	
				Base Pena	\$25,000
>> En	vironme	ntal, Prope	rty and Hum	an Health Matrix	
		Dalaass	Maior	Harm Moderate Minor	
OR		Release Actual	Major	Moderate Minor	
		Potential		Percent 15.0%	
>>Pro	gramma	tic Matrix			
		Falsification	Major	Moderate Minor Percent 0.0%	
				Percent 0.0%	
		Human health	or the environn	nent has been exposed to insignificant amounts of pollutants that	lid
	Matrix			tective of human health or environmental receptors as a result of t	
	Notes			violation.	
					
				Adjustment \$21,2	50
					\$3,750
Violati	on Even	ts			
		Number of \	/iolation Events	1 2 Number of violation days	
		Number of v	riolation Events	1 Number of violation days	
			daily		
			weekly		
			monthly		+2.750
			quarterly semiannual	X Violation Base Pena	lty \$3,750
			annual		
			single event		
					
		One quarterly	event is recomi	nended for the instances of non-compliance that occurred on Augu	est
				27, 2020 and August 29, 2020.	
					
Good I	Faith Eff	orts to Com		25.0% Reducti	on \$937
				efore NOE/NOV NOE/NOV to EDPRP/Settlement Offer	
			Extraordinary		
			Ordinary	X	
			N/A		
			Notes	The Respondent completed the corrective measures on	
				August 29, 2020, prior to the NOE dated May 27, 2021.	
			<u>.</u>		
				Violation Subto	tal \$2,813
Econo	mic Bene	efit (EB) for	this violation	on Statutory Limit Test	
		Estimate	ed EB Amount	\$3 Violation Final Penalty To	tal \$6,439
			- [
				This violation Final Assessed Penalty (adjusted for limit	(s) \$6,439

		conomic		Wo	rksheet		
Respondent Case ID No. Leg. Ent. Reference No.	60882	.C (PCW No. 3 of	4)				
Media Violation No.	Air					Percent Interest	Years of Depreciation
						5.0	15
	Item Cost	Date Required	Final Date	Yrs	Interest Saved	Costs Saved	EB Amount
Item Description							
Delayed Costs				_			
Equipment				0.00	\$0	\$0	\$0
Buildings				0.00	\$0	\$0	\$0
Other (as needed)				0.00	\$0	\$0	\$0
Engineering/Construction				0.00	\$0	\$0	\$0
Land				0.00	\$0	n/a	\$0
Record Keeping System				0.00	\$0	n/a	\$0
Training/Sampling				0.00	\$0	n/a	\$0
Remediation/Disposal				0.00	\$0	n/a	\$0
Permit Costs Other (as needed)	\$10,000	27-Aug-2020		0.00	\$0 \$3	n/a n/a	<u>\$0</u> \$3
Notes for DELAYED costs					of non-complianc	concentration limit e and the Final Date	
Avoided Costs	ANNU/	ALIZE avoided c	osts before er	tering	item (except for	one-time avoide	d costs)
Disposal				0.00	\$0	\$0	\$0
Personnel				0.00	\$0	\$0	
spection/Reporting/Sampling					+ 0		\$0
spection, keporting, sampling				0.00	\$0	\$0	\$0
Supplies/Equipment				0.00	\$0	\$0	\$0 \$0
				0.00	\$0 \$0	\$0 \$0	\$0 \$0 \$0
Supplies/Equipment				0.00 0.00 0.00	\$0 \$0 \$0	\$0 \$0 \$0	\$0 \$0 \$0 \$0
Supplies/Equipment Financial Assurance				0.00	\$0 \$0	\$0 \$0	\$0 \$0 \$0
Supplies/Equipment Financial Assurance ONE-TIME avoided costs				0.00 0.00 0.00	\$0 \$0 \$0	\$0 \$0 \$0	\$0 \$0 \$0 \$0

		ening Date				:ket No. 2021-0818-AIR-E		PCW
			INEOS USA LLO	(PCW No. 3 of	4)		Policy	Revision 4 (April 2014)
D		ase ID No.					PCW R	levision March 26, 2014
Reg. I	ent. Ker	erence No. Media	RN100238708					
	Fnf C		Danielle Porras					
		tion Number						
	11010			Code 88 101 2	0(3) 116 11	15(b)(2)(F) and (c), and 122.14	3(4) NSR	
			Permit Nos. 95	and PSDTX854	M2, SC No.	2, FOP No. 02327, GTC and ST	C No. 26,	
					•	ty Code § 382.085(b)	,	
			Failed to com	ply with the MAI	ER. Specific	ally, the Respondent exceeded	the VOC	
	Violatio	n Description				rolling period for the 12-month		
		-	_	-		nber 2020 for the Olefins 1 and tons of unauthorized VOC emis		
			LPN FLAKE	M33CAP, Tesuiti	ilig iii 30.94	tons of unauthorized voc entis	510115.	
								•
						Bas	e Penalty	\$25,000
>> Env	ironme	ntal. Prope	rty and Hum	an Health M	latrix			
		•	-	Harm				
OR		Release Actual	Major	Moderate	Minor			
UK		Potential		Х		Percent 30.0%		
		roteiitiai				Fercent 30.0%		
>>Prog	, ramma	tic Matrix						
Ī		Falsification	Major	Moderate	Minor			
						Percent 0.0%		
	Matrix				•	significant amounts of pollutants environmental receptors as a re		
	Notes	not exceed lev	reis triat are pro		ri nealth of e violation.	environmental receptors as a re	suit of the	
						Adjustment	\$17,500	
							Ī	\$7,500
Violatio	n Event	ts						
		Number of \	/iolation Events	2		61 Number of violation	days	
					<u> </u>		,	
			daily					
			weekly					
			monthly	Х		Walakian Baa		÷1 F 000
			quarterly semiannual			Violation Bas	e Penaity	\$15,000
			annual					
			single event					
		Two mont	bly ayanta ara m	acammandad fu	om August 1	2020 through Contombor 20	2020	
		TWO IIIOIIL	illy events are r	ecommended m	om August 1	, 2020 through September 30,	2020.	
		_	_					
Good Fa	aith Effo	orts to Com		25.0% efore NOE/NOV N	OF/NOV to FDI	PRP/Settlement Offer	Reduction	\$3,750
			Extraordinary	ciore NoL/Nov	OL/NOV to EDI	Tri / Section of the		
			Ordinary	х				
			N/A					
				The Responds	ent complete	d the corrective measures by		
			Notes			the NOE dated May 27, 2021.		
				, -, -	, , , , ,	., ,		
						Violation	Subtotal	\$11,250
Fconom	ic Rene	efit (FR) for	this violation	on		Statutory Limit	Test	
	c Delle			/ 11				
		Estimate	ed EB Amount		\$43	Violation Final Pen	alty Total	\$23,651
				This violat	tion Final A	ssessed Penalty (adjusted f	or limits)	\$23,651

	E	conomic	Benefit	Wo	rksheet		
Respondent	INEOS USA LL	C (PCW No. 3 of 4	1)				
Case ID No.	60882						
Reg. Ent. Reference No.	RN100238708						
Media	Air					Percent Interest	Years of
Violation No.	31					reicent interest	Depreciation
						5.0	15
	Item Cost	Date Required	Final Date	Yrs	Interest Saved	Costs Saved	EB Amount
Item Description							
•							
Delayed Costs							
Equipment				0.00	\$0	\$0	\$0
Buildings				0.00	\$0	\$0	\$0
Other (as needed)				0.00	\$0	\$0 \$0	\$0
Engineering/Construction Land				0.00	\$0 \$0	n/a	\$0 \$0
Record Keeping System				0.00	\$0	n/a	\$0
Training/Sampling				0.00	\$0	n/a	\$0
Remediation/Disposal				0.00	\$0	n/a	\$0
Permit Costs				0.00	\$0	n/a	\$0
Other (as needed)	\$1,500	1-Aug-2020	28-Feb-2021	0.58	\$43	n/a	\$43
Notes for DELAYED costs	review the em	nission points whe C annual MAER fo	re the emissions r the Olefins 1 a	s origin ınd 2 Fl	ated from every m	an by having Operatonth and demonstroscape. The Date Reate of compliance.	ate compliance
Avoided Costs	ANNUA	LIZE avoided c	osts before en	tering	item (except for	one-time avoide	d costs)
Disposal				0.00	\$0	\$0	\$0
Personnel				0.00	\$0	\$0	\$0
Inspection/Reporting/Sampling				0.00	\$0	\$0	\$0
Supplies/Equipment				0.00	\$0	\$0	\$0
Financial Assurance				0.00	\$0	\$0	\$0
ONE-TIME avoided costs				0.00	\$0	\$0	\$0
Other (as needed) Notes for AVOIDED costs				0.00	\$0	\$0	\$0
Approx. Cost of Compliance		\$1,500			TOTAL		\$43

	Scre	ening Date	8-Sep-2020		Doc	ket No. 2021-0818-AIR-E		PCW
			INEOS USA LLC	(PCW No. 3 of	4)		Policy I	Revision 4 (April 2014)
D		ase ID No.					PCW Re	evision March 26, 2014
Reg.	Ent. Ker	erence No. Media	RN100238708					
	Enf. C		Danielle Porras					
		tion Number						
		Rule Cite(s)	20 Toy Admir	a Codo 5 133	210(a) and T	ov. Haalth & Cafaty Coda C 202 001	E(b)	
			30 Tex. Admii	1. Code § 122.	210(a) and 1	ex. Health & Safety Code § 382.08	5(0)	
	Violatio	n Description	remove one or not submit ar regulatory requ	more permit to application to uirements for S	erms and con revise FOP N Stationary Red	on to an FOP at a site to change, ad ditions. Specifically, the Responder lo. O2327 to incorporate the applica ciprocating Internal Combustion Eng. , OLE2COMP2, and DCPCOMP2.	nt did able	
						Base Pe	nalty	\$25,000
>> Env	/ironme	ntal Proper	rty and Hum	an Health N	Matriv			
// LIIV		iitai, Fiopei	ity and main	Harm	-iati ix			
		Release	Major	Moderate	Minor			
OR		Actual				B		
		Potential				Percent 0.0%		
>>Proc	gramma	tic Matrix						
		Falsification	Major	Moderate	Minor			
			Х			Percent 15.0%		
	Matrix Notes		100	% of the rule r	requirements	were not met.		
						Adjustment \$2	21,250	
								¢2.7F0
								\$3,750
Violatio	on Event	ts						
		Number of \	/iolation Events	1		344 Number of violation days	_	
		Number of V	Tolation Events	Τ		Number of violation days	,	
			daily weekly monthly quarterly semiannual annual			Violation Base Pe	nalty	\$3,750
			single event	Х				
				One single ev	vent is recom	mended.		
Good F	aith Effo	orts to Com	ply	0.0%		Redu	uction	\$0
			 	efore NOE/NOV N	NOE/NOV to EDP	RP/Settlement Offer		
			Extraordinary					
			Ordinary					
			N/A	Х				
			Notes	The Responde		neet the good faith criteria for iolation.		
						Violation Sub	ototal	\$3,750
Econon	nic Bene	efit (EB) for	this violation	n		Statutory Limit Te	st	
		Estimate	ed EB Amount		\$2,705	Violation Final Penalty	Total	\$7,376
				This viola	ition Final A	ssessed Penalty (adjusted for li	mits)	\$7,376

	E	conomic	Benefit	Wo	rksheet		
Respondent	INEOS USA LL	C (PCW No. 3 of 4	1)				
Case ID No.	60882						
Reg. Ent. Reference No.	RN100238708						
Media	Air					Percent Interest	Years of
Violation No.	32					Percent Interest	Depreciation
						5.0	15
	Item Cost	Date Required	Final Date	Yrs	Interest Saved	Costs Saved	EB Amount
Item Description		_					
Delayed Costs							
Equipment				0.00	\$0	\$0	\$0
Buildings				0.00	\$0	\$0	\$0
Other (as needed)				0.00	\$0	\$0	\$0
Engineering/Construction				0.00	\$0	\$0	\$0
Land				0.00	\$0	n/a	\$0
Record Keeping System				0.00	\$0	n/a	\$0
Training/Sampling				0.00	\$0	n/a	\$0
Remediation/Disposal				0.00	\$0	n/a	\$0
Permit Costs	\$5,000	1-Jul-2020	23-Aug-2024	4.15	\$1,037	n/a	\$1,037
Other (as needed)	\$10,000	1-Jul-2020	1-Nov-2023	3.34	\$1,668	n/a	\$1,668
Notes for DELAYED costs	Combustic process (\$5,00	on Engine DCPCOM 00) and remove S 6, OLE2COMP2 fro	MP2 and update tationary Recipr om the Plant (\$	FOP No ocating 10,000	o. 0237 through th g Internal Combust	ationary Reciprocating use of the off-per cion Engines UTILCM ired are the first date compliance.	mit change IP3, UTILCMP4,
Avoided Costs	ANNUA	ALIZE avoided co	osts before en	tering	item (except for	one-time avoide	d costs)
Disposal				0.00	\$0	\$0	\$0
Personnel				0.00	\$0	\$0	\$0
Inspection/Reporting/Sampling				0.00	\$0	\$0	\$0
Supplies/Equipment				0.00	\$0	\$0	\$0
Financial Assurance				0.00	\$0	\$0	\$0
ONE-TIME avoided costs				0.00	\$0	\$0	\$0
Other (as needed)				0.00	\$0	\$0	\$0
Notes for AVOIDED costs							
Approx. Cost of Compliance		\$15,000			TOTAL		\$2,705



Penalty Calculation Worksheet (PCW)

Policy Revision 5 (January 28, 2021) PCW Revision February 11, 2021

 DATES
 Assigned
 8-Sep-2021

 PCW
 22-Aug-2024

PCW 22-Aug-2024 Screening 15-Sep-2021 EPA Due 27-Feb-2022

RESPONDENT/FACILI	TY INFORMATION		
Respondent	INEOS USA LLC (PCW No. 4 of 4)		
Reg. Ent. Ref. No.	RN100238708		Ī
Facility/Site Region	12-Houston	Major/Minor Source Major	1

CASE INFORMATION					
Enf./Case ID No.	60882		No.	of Violations	25
Docket No.	2021-0818-AIR-E			Order Type	1660
Media Program(s)	Air		Government	t/Non-Profit	No
Multi-Media			Enf.	Coordinator	Danielle Porras
		·		EC's Team	Enforcement Team 2
Admin. Penalty \$ I	imit Minimum \$0 M	aximum	\$25,000	•	_

			Penalty (Calcula	tion Section	n		
TOTA	L BASE PENA	ALTY (Sum of	violation bas			, 	Subtotal 1	\$650,000
AD1U	STMFNTS (+	/-) TO SUBTO	OTAL 1	-	-		-	
ADJO			the Total Base Penalt	y (Subtotal 1	.) by the indicated pe	ercentage.		
	Compliance Hi	story		78.0%	Adjustment	Subto	tals 2, 3, & 7	\$507,000
	Notes	NOVs with dissi	for three NOVs w milar violations, a ion for one Notice Disclosure	nd three o	rders containing to conduct an au	a denial of		
	Culpability	No		0.0%	Enhancement		Subtotal 4	\$0
	Notes		spondent does no			ria.		
	Good Faith Eff	ort to Comply T	otal Adjustment	:s			Subtotal 5	-\$26,125
							_	
	Economic Ben	efit		50.0%	Enhancement*		Subtotal 6	\$33,134
	Estimated	Total EB Amounts I Cost of Compliance	\$33,134 \$240,000		d at the Total EB \$ A	mount	_	
SUM (OF SUBTOTA	LS 1-7				F	inal Subtotal	\$1,164,009
							_	
		AS JUSTICE M I Subtotal by the indic	IAY REQUIRE		0.0%		Adjustment	\$0
Reduces	Notes	Subtotal by the make	aceu percentage.					
						Final Per	nalty Amount	\$1,164,009
STAT	IITODV I TMT	T ADJUSTMEN	JT			Einel Acce	seed Danathy	\$1,164,009
SIAI	OTOKI LIMI	I ADJUSTNEI	* 1			rinai ASSE	ssed Penalty	\$1,104,009
DEFE					20.0%	Reduction	Adjustment	-\$232,801
Reduces	Notes	enalty by the indicated	Deferral offered fo	r expedite	d settlement.			
PAYA	BLE PENALT	Y						\$931,208
	 -							

Policy Revision 5 (January 28, 2021) PCW Revision February 11, 2021

Respondent INEOS USA LLC (PCW No. 4 of 4)

Case ID No. 60882

Reg. Ent. Reference No. RN100238708

Media Air

Enf. Coordinator Danielle Porras

Compliance History Worksheet

>> Compliance History Site Enhancement (Subtotal 2)

Component	Number of	Number	Adjust.
NOVs	Written notices of violation ("NOVs") with same or similar violations as those in the current enforcement action (number of NOVs meeting criteria)	3	15%
	Other written NOVs	3	6%
	Any agreed final enforcement orders containing a denial of liability (number of orders meeting criteria)	3	60%
Orders	Any adjudicated final enforcement orders, agreed final enforcement orders without a denial of liability, or default orders of this state or the federal government, or any final prohibitory emergency orders issued by the commission	0	0%
Judgments	Any non-adjudicated final court judgments or consent decrees containing a denial of liability of this state or the federal government (number of judgments or consent decrees meeting criteria)	0	0%
and Consent Decrees	Any adjudicated final court judgments and default judgments, or non-adjudicated final court judgments or consent decrees without a denial of liability, of this state or the federal government	0	0%
Convictions	Any criminal convictions of this state or the federal government (number of counts)	0	0%
Emissions	Chronic excessive emissions events (number of events)	0	0%
Audits	Letters notifying the executive director of an intended audit conducted under the Texas Environmental, Health, and Safety Audit Privilege Act, 74th Legislature, 1995 (number of audits for which notices were submitted)	1	-1%
Addits	Disclosures of violations under the Texas Environmental, Health, and Safety Audit Privilege Act, 74th Legislature, 1995 (number of audits for which violations were disclosed)	1	-2%
	Te · · · · · · · · · · ·		
	Environmental management systems in place for one year or more	No	0%
Other	Voluntary on-site compliance assessments conducted by the executive director under a special assistance program	No	0%
	Participation in a voluntary pollution reduction program	No	0%

	Environmental management systems in place for one year or more	No	0%	
Other	Voluntary on-site compliance assessments conducted by the executive director under a special assistance program	No	0%	
	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)

>> Repeat Violator (Subtotal 3)

No

Adjustment Percentage (Subtotal 3)

>> Compliance History Person Classification (Subtotal 7)

Satisfactory Performer

Adjustment Percentage (Subtotal 7)

>> Compliance History Summary

Compliance History Notes

Enhancement for three NOVs with same or similar violations, three NOVs with dissimilar violations, and three orders containing a denial of liability. Reduction for one Notice of Intent to conduct an audit and one Disclosure of Violations.

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

>> Final Compliance History Adjustment

Final Adjustment Percentage *capped at 100%

78%

	E	conomic	Benefit	Wor	ksheet		
Respondent	INEOS USA LL	.C (PCW No. 4 of 4	!)				
Case ID No.							
Reg. Ent. Reference No.	RN100238708	}					
Media Violation No.	Air					Percent Interest	Years of Depreciation
						5.0	15
	Item Cost	Date Required	Final Date	Yrs	Interest Saved	Costs Saved	EB Amount
Item Description							
reem Description							
Delayed Costs							
Equipment				0.00	\$0	\$0	\$0
Buildings				0.00	\$0	\$0	\$0
Other (as needed)				0.00	\$0	\$0	\$0
Engineering/Construction				0.00	\$0	\$0	\$0
Land				0.00	\$0	n/a	\$0
Record Keeping System				0.00	\$0	n/a	\$0
Training/Sampling				0.00	\$0	n/a	\$0
Remediation/Disposal				0.00	\$0	n/a	\$0
Permit Costs				0.00	\$0	n/a	\$0
Other (as needed)	\$10,000	15-Jan-2020	1-Jan-2025	4.97	\$2,484	n/a	\$2,484
Notes for DELAYED costs			ired is the first o	late of r		NOx, and NH3 conce d the Final Date is t	
Avoided Costs	ANNU	ALIZE avoided c	osts before en	tering	item (except for	one-time avoided	l 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		\$2,484

	E	conomic	Benefit	Wor	ksheet		
Respondent	INEOS USA LL	.C (PCW No. 4 of 4	1)				
Case ID No.							
Reg. Ent. Reference No.	RN100238708	}					
Media Violation No.	Air					Percent Interest	Years of Depreciation
						5.0	15
	Item Cost	Date Required	Final Date	Yrs	Interest Saved	Costs Saved	EB Amount
Item Description						55555 54154	
Item Description							
Delayed Costs							
Equipment				0.00	\$0	\$0	\$0
Buildings				0.00	\$0	\$0	\$0
Other (as needed)				0.00	\$0	\$0	\$0
Engineering/Construction				0.00	\$0	\$0	\$0
Land				0.00	\$0	n/a	\$0
Record Keeping System				0.00	\$0	n/a	\$0
Training/Sampling				0.00	\$0	n/a	\$0
Remediation/Disposal				0.00	\$0	n/a	\$0
Permit Costs				0.00	\$0	n/a	\$0
Other (as needed)	\$10,000	14-Jan-2020	1-Jan-2025	4.97	\$2,485	n/a	\$2,485
Notes for DELAYED costs	for Turbine 2	2. The Date Requ	ired is the first o	late of ree of con	non-compliance and notice and notice.	NOx, and NH3 conce d the Final Date is th	ne estimated
Avoided Costs	ANNU	ALIZE avoided c	osts before er	tering	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		\$2,485

Responden	15-Sep-2021			cket No. 2021-0818-A	R-E	PCW
•	INEOS USA LL	C (PCW No. 4	of 4)		Policy R	evision 5 (January 28, 2021)
Case ID No					PCV	/ Revision February 11, 2021
Reg. Ent. Reference No						
Media						
Enf. Coordinato		} 				
Violation Numbe					1	
Rule Cite(s	30 Tex. Admin	. Code §§ 101	20(3), 116.13	15(b)(2)(F) and (c), and	122.143(4), NSR Permit Nos.	
	123117, PSD			, SC No. 1, FOP No. 0396 Safety Code § 382.085(b	66, GTC and STC No. 7, and)	
	Failed to co	mply with the	maximum allo	wable emissions rates ("I	MAERs"). Specifically, the	
					/hr") by a range from 0.03	
Wielstien Description					uary 1, 2020 to September	
Violation Description					m 0.09 lb/hr to 29.42 lbs/hr ptember 3, 2020 for Turbine	
			•		uthorized release of 850.73	
		lbs of 0	CO emissions a	and 600.11 lbs of NOx em	issions.	
					Base Penalty	\$25,000
>> Environmental, Prope	erty and Hun		Matrix			
Release	e Major	Harm Moderate	Minor			
OR Actua		Moderate	X			
Potentia				Percent	30.0%	
>>Programmatic Matrix						
Falsification	Major	Moderate	Minor			
				Percent	0.0%	
			•	nsignificant amounts of peronmental receptors as a	ollutants that did not exceed result of the violation.	
				Adjı	stment \$17,500	
						\$7,500
						ψ.,,500
Violation Events						
Number of	Violation Events	7		49 Number of vic	lation days	
	daily		1			
		41				
	weekly		i			
	weekly monthly	Х				
		X			Violation Base Penalty	\$52,500
	monthly	X			Violation Base Penalty	\$52,500
	monthly quarterly semiannual annual	X			Violation Base Penalty	\$52,500
	monthly quarterly semiannual	x			Violation Base Penalty	\$52,500
Seven mont	monthly quarterly semiannual annual single event	ecommended f		es of non-compliance tha pril 3, 2020 to Septembe	c occurred from January 29,	\$52,500
	monthly quarterly semiannual annual single event thly events are re 2020 to Fe	ecommended f	20 and from A	•	c occurred from January 29, - 30, 2020.	
Seven mont Good Faith Efforts to Cor	monthly quarterly semiannual annual single event thly events are re 2020 to Fe	ecommended f	20 and from A	pril 3, 2020 to Septembe	c occurred from January 29,	\$52,500 \$52,500
	monthly quarterly semiannual annual single event thly events are re 2020 to Fe	ecommended f bruary 28, 20 0.0% Before NOE/NOV	20 and from A	•	c occurred from January 29, - 30, 2020.	
	monthly quarterly semiannual annual single event thly events are re 2020 to Fe	ecommended f bbruary 28, 20 0.0% Before NOE/NOV	20 and from A	pril 3, 2020 to Septembe	c occurred from January 29, - 30, 2020.	
	monthly quarterly semiannual annual single event thly events are re 2020 to Fe mply Extraordinary Ordinary	ecommended february 28, 20: 0.0% Before NOE/NOV	20 and from A	pril 3, 2020 to Septembe	c occurred from January 29, - 30, 2020.	
	monthly quarterly semiannual annual single event thly events are re 2020 to Fe	ecommended february 28, 20. 0.0% Before NOE/NOV	20 and from A NOE/NOV to ED	pril 3, 2020 to Septembe	c occurred from January 29, - 30, 2020. Reduction	
	monthly quarterly semiannual annual single event thly events are re 2020 to Fe mply Extraordinary Ordinary	ecommended february 28, 20: 0.0% Before NOE/NOV x The Rest	20 and from A NOE/NOV to ED	pril 3, 2020 to Septembe	c occurred from January 29, - 30, 2020. Reduction	
	monthly quarterly semiannual annual single event chly events are re 2020 to Fe mply Extraordinary Ordinary N/A	ecommended february 28, 20: 0.0% Before NOE/NOV x The Rest	20 and from A NOE/NOV to ED	PRP/Settlement Offer	c occurred from January 29, - 30, 2020. Reduction	
	monthly quarterly semiannual annual single event thly events are re 2020 to Fe Extraordinary Ordinary N/A Notes	ecommended february 28, 20. 0.0% Before NOE/NOV X The Resp	20 and from A NOE/NOV to ED	PRP/Settlement Offer	Reduction riteria for this Violation Subtotal	\$0
Good Faith Efforts to Cor	monthly quarterly semiannual annual single event thly events are re 2020 to Fe Extraordinary Ordinary N/A Notes	ecommended fibruary 28, 20. 0.0% Before NOE/NOV x The Resp	20 and from A NOE/NOV to ED	PRP/Settlement Offer not meet the good faith coviolation. Statutory	Reduction riteria for this Violation Subtotal	\$0

	E	conomic	Benefit	Wor	ksheet		
		.C (PCW No. 4 of 4	1)				
Case ID No.	60882						
Reg. Ent. Reference No.	RN100238708	;					
Media Violation No.						Percent Interest	Years of Depreciation
						5.0	15
	Item Cost	Date Required	Final Date	Yrs	Interest Saved	Costs Saved	EB Amount
Item Description		•					
Delayed Costs							
Equipment				0.00	\$0	\$0	\$0
Buildings				0.00	\$0	\$0	\$0
Other (as needed)				0.00	\$0	\$0	\$0
Engineering/Construction				0.00	\$0	\$0	\$0
Land				0.00	\$0	n/a	\$0
Record Keeping System				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	29-Jan-2020	1-Jan-2025	4.93	\$2,464	n/a	\$2,464
Notes for DELAYED costs	1, Turbine 1	. The Date Requi	red is the first d dat	ate of n	on-compliance and notice and notice.	and NOx hourly MAE of the Final Date is th	ne estimated
Avoided Costs	ANNU	ALIZE avoided c	osts before en			one-time avoided	
Disposal				0.00	\$0	\$0	\$0
Personnel				0.00	\$0	\$0	\$0
Inspection/Reporting/Sampling				0.00	\$0	\$0	\$0
Supplies/Equipment				0.00	\$0	\$0	\$0
Financial Assurance				0.00	\$0	\$0	\$0
ONE-TIME avoided costs				0.00	\$0	\$0	\$0
Other (as needed)				0.00	\$0	\$0	\$0
Notes for AVOIDED costs							

	E	conomic	Benefit	Wor	'ksheet		
Respondent	INEOS USA LL	.C (PCW No. 4 of 4	1)				
Case ID No.							
Reg. Ent. Reference No.	RN100238708						
Media Violation No.	Air					Percent Interest	Years of Depreciation
Violation No.						5.0	15
	Item Cost	Date Required	Final Date	Yrs	Interest Saved	Costs Saved	EB Amount
Item Description		•					
Delayed Costs							
Equipment				0.00	\$0	\$0	\$0
Buildings				0.00	\$0	\$0	\$0
Other (as needed)				0.00	\$0	\$0	\$0
Engineering/Construction				0.00	\$0	\$0	\$0
Land				0.00	\$0	n/a	\$0
Record Keeping System				0.00	\$0	n/a	\$0
Training/Sampling				0.00	\$0	n/a	\$0
Remediation/Disposal				0.00	\$0	n/a	\$0
Permit Costs				0.00	\$0	n/a	\$0
Other (as needed)	\$10,000	30-Jan-2020	1-Jan-2025	4.93	\$2,463	n/a	\$2,463
Notes for DELAYED costs		•	Date Required i	s the fir	• •	NOx, NH3, and VOC	
Avoided Costs	ANNU	ALIZE avoided c	osts before er	tering	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		\$2,463

	E	conomic	Benefit	Woı	ksheet		
Respondent	INEOS USA LL	.C (PCW No. 4 of 4	.)				
Case ID No.	60882						
Reg. Ent. Reference No.	RN100238708						
Media Violation No.	Air					Percent Interest	Years of Depreciation
						5.0	15
	Item Cost	Date Required	Final Date	Yrs	Interest Saved	Costs Saved	EB Amount
Item Description		·					
Delayed Costs							
Equipment				0.00	\$0	\$0	\$0
Buildings				0.00	\$0	\$0	\$0
Other (as needed)				0.00	\$0	\$0	\$0
Engineering/Construction				0.00	\$0	\$0	\$0
Land				0.00	\$0	n/a	\$0
Record Keeping System				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	20-Feb-2020	1-Jan-2025	4.87	\$2,434	n/a	\$2,434
Notes for DELAYED costs		•	. The Date Rec	uired is	• •	and NH3 concentrat on-compliance and	
Avoided Costs	ANNU	ALIZE avoided c	osts before en	tering	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		\$2,434

	E	conomic	Benefit	Wor	ksheet		
Respondent	INEOS USA LL	C (PCW No. 4 of 4	·)				
Case ID No.	60882						
Reg. Ent. Reference No.	RN100238708	3					
Media Violation No.						Percent Interest	Years of Depreciation
Violation No.	ŭ					5.0	15
	Item Cost	Date Required	Final Date	Yrs	Interest Saved	Costs Saved	EB Amount
Item Description							
zeem zeeenparen							
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	+10.000	4.5.1.2020	4.1. 2025	0.00	\$0	n/a	\$0
Other (as needed)	\$10,000	4-Feb-2020	1-Jan-2025	4.91	\$2,456	n/a	\$2,456
	Estimate	d cost to impleme	nt measures de	sianed t	o comply with the	NOx emissions limit	and NH3
Notes for DELAYED costs		•		_	' '	-compliance and th	
		20 2.			e of compliance.	. compilarico ana en	o i mai bato ib
					<u> </u>		
Avoided Costs	ANNU	ALIZE avoided c	osts before en			one-time avoided	
Disposal				0.00	\$0	\$0	\$0
Personnel				0.00	\$0	\$0	\$0
Inspection/Reporting/Sampling				0.00	\$0	\$0	\$0
Supplies/Equipment Financial Assurance				0.00	\$0 \$0	\$0 \$0	\$0
ONE-TIME avoided costs				0.00		\$0 \$0	\$0 \$0
Other (as needed)				0.00	\$0 \$0	\$0 \$0	\$0
Other (as needed)		_		0.00	D U	\$ U	\$0
Notes for AVOIDED costs							
Ammuni Cont of Commission							
Approx. Cost of Compliance		\$10,000			TOTAL		\$2,456

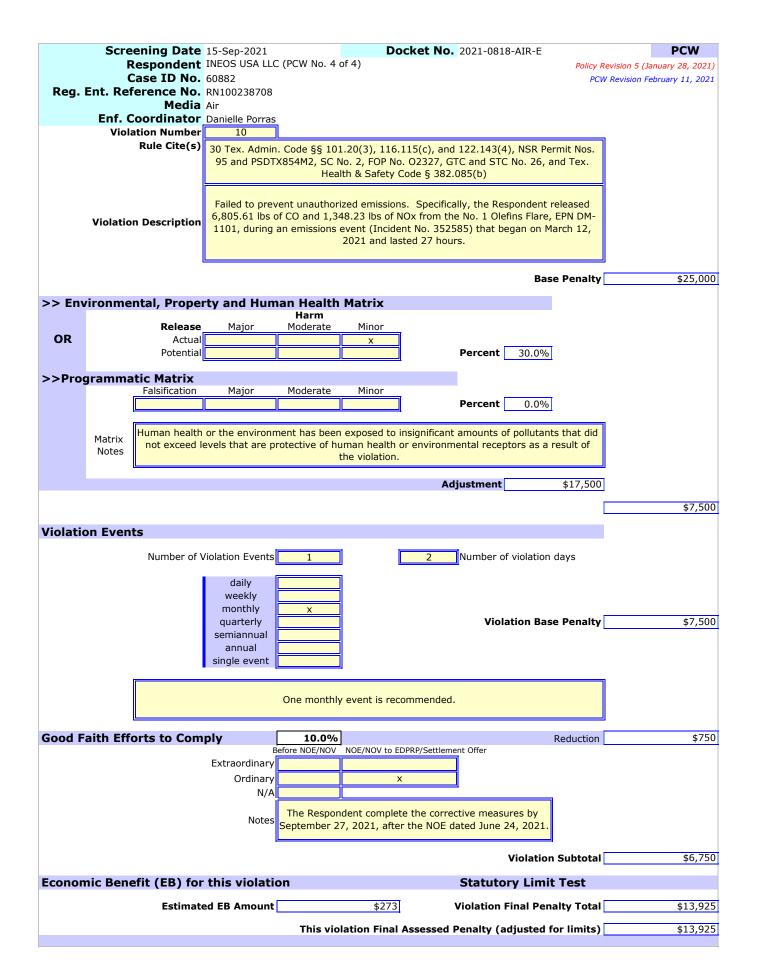
	Screening Date	15-Sep-2021		DOC	ket No. 2021-0818-A	AIN-L		PCW
	Respondent	INEOS USA LLO	C (PCW No. 4 o	of 4)			Policy Rev	vision 5 (January 28, 2021)
	Case ID No.	60882					PCW F	Revision February 11, 2021
Rea. Ent.	. Reference No.	RN100238708						
	Media							
F	nf. Coordinator							
-	Violation Number		1					
	Rule Cite(s)							
	Rule Cite(S)	00 10/11/11/11/11			5(c), 117.310(c)(2)(B)			
		Nos. 123117,			X135, SC No. 7, FOP No.		C Nos.	
			1.A. and	7, and Tex. He	ealth & Safety Code § 3	82.085(b)		
		Eailed to see	mply with the	omissions and	concentration limits. S	nacifically, the Becner	ndont	
					0 ppmvd at 3% O2 by a	• • • • • • • • • • • • • • • • • • • •		
					n 13 days from January			
		exceeded the			lb/MMBtu by a range fr	, , , , ,		
Vio	olation Description				s from January 6, 2020	•		
					10.0 ppmvd at 3% O2			
					mvd to 28.67 ppmvd fo			
		averaging pe		• • •	0 to September 30, 202		011 10	
			44,5	, 20, 202	0 to 0 opto50. 50, 202			
						D	D	+25.000
						Base	Penalty	\$25,000
>> Enviro	nmental, Prope	rtv and Hum	nan Health	Matrix				
	, , , , , , , , , , , , , , , , , , ,	,	Harm					
	Release	Major	Moderate	Minor				
OR	Actual			X				
	Potential				Percent	30.0%		
>>Program	mmatic Matrix							
	Falsification	Major	Moderate	Minor				
					Percent	0.0%		
	Library basks				-116	and the second of the second of the second		
				•	significant amounts of ponmental receptors as a			
INC	otes levels t	illat are protecti	ive or muman i	lealth of enviro	ommentar receptors as a	result of the violation	1.	
					Adj	ustment	\$17,500	
					Adj	ustment	\$17,500	47.50
					Adj	ustment	\$17,500	\$7,500
Violation F	Events				Adj	ustment	\$17,500	\$7,500
Violation E	Events				Adj	ustment	\$17,500	\$7,500
Violation E		/iolation Events	7		Adj		\$17,500	\$7,500
Violation E		/iolation Events	7				\$17,500	\$7,500
Violation E		/iolation Events daily	7				\$17,500	\$7,500
Violation E			7				\$17,500	\$7,500
Violation E		daily	7 X				\$17,500	\$7,500
Violation E		daily weekly						\$7,500 \$52,500
Violation E		daily weekly monthly				iolation days		
Violation E		daily weekly monthly quarterly				iolation days		
Violation E		daily weekly monthly quarterly semiannual				iolation days		
Violation E		daily weekly monthly quarterly semiannual annual				iolation days		
Violation E	Number of \	daily weekly monthly quarterly semiannual annual single event	X	for the instance		iolation days Violation Base	Penalty	
Violation E	Number of \ Seven monti	daily weekly monthly quarterly semiannual annual single event	X X Secondary Se		81 Number of vi	Violation Base	Penalty	
Violation E	Number of \ Seven monti	daily weekly monthly quarterly semiannual annual single event	X X Secondary Se		81 Number of vi	Violation Base	Penalty	
	Number of N Seven montl 2020 to May	daily weekly monthly quarterly semiannual annual single event	x x	to July 16, 202	81 Number of vi	Violation Base Violation Base at occurred from Janu r 15, 2020 to Septem	Penalty Jary 6, ber 30,	\$52,500
	Number of \ Seven monti	daily weekly monthly quarterly semiannual annual single event nly events are re 13, 2020, from	x x ecommended July 15, 2020	to July 16, 202 2020	81 Number of vines of non-compliance the 20, and from Septembe 1.	Violation Base Violation Base at occurred from Janu r 15, 2020 to Septem	Penalty	
	Number of N Seven montl 2020 to May	daily weekly monthly quarterly semiannual annual single event nly events are re 13, 2020, from	x x ecommended July 15, 2020	to July 16, 202 2020	81 Number of vi	Violation Base Violation Base at occurred from Janu r 15, 2020 to Septem	Penalty Jary 6, ber 30,	\$52,500
	Number of N Seven montl 2020 to May	daily weekly monthly quarterly semiannual annual single event 13, 2020, from ply Extraordinary	x x ecommended July 15, 2020	to July 16, 202 2020	81 Number of vines of non-compliance the 20, and from Septembe 1.	Violation Base Violation Base at occurred from Janu r 15, 2020 to Septem	Penalty Jary 6, ber 30,	\$52,500
	Number of N Seven montl 2020 to May	daily weekly monthly quarterly semiannual annual single event nly events are re 13, 2020, from	x x ecommended July 15, 2020	to July 16, 202 2020	81 Number of vines of non-compliance the 20, and from Septembe 1.	Violation Base Violation Base at occurred from Janu r 15, 2020 to Septem	Penalty Jary 6, ber 30,	\$52,500
	Number of N Seven montl 2020 to May	daily weekly monthly quarterly semiannual annual single event 13, 2020, from ply Extraordinary	x ecommended to July 15, 2020 0.0% efore NOE/NOV	to July 16, 202 2020	81 Number of vines of non-compliance the 20, and from Septembe 1.	Violation Base Violation Base at occurred from Janu r 15, 2020 to Septem	Penalty Jary 6, ber 30,	\$52,500
	Number of N Seven montl 2020 to May	daily weekly monthly quarterly semiannual annual single event 13, 2020, from Ply Extraordinary Ordinary	x ecommended of July 15, 2020 0.0% sefore NOE/NOV	to July 16, 2020 2020 NOE/NOV to EDP	es of non-compliance the 20, and from Septembe .	Violation Base Violation Base Nat occurred from Januar 15, 2020 to Septem R	Penalty Jary 6, ber 30,	\$52,500
	Number of N Seven montl 2020 to May	daily weekly monthly quarterly semiannual annual single event 13, 2020, from Ply Extraordinary Ordinary	x x x x x x x x x x x x x x x x x x x	to July 16, 2020 2020 NOE/NOV to EDP	es of non-compliance the 20, and from Septembe. RP/Settlement Offer ot meet the good faith of	Violation Base Violation Base Nat occurred from Januar 15, 2020 to Septem R	Penalty Jary 6, ber 30,	\$52,500
	Number of N Seven montl 2020 to May	daily weekly monthly quarterly semiannual annual single event 13, 2020, from Ply Extraordinary Ordinary N/A	x x x x x x x x x x x x x x x x x x x	to July 16, 2020 2020 NOE/NOV to EDP	es of non-compliance the 20, and from Septembe .	Violation Base Violation Base Nat occurred from Januar 15, 2020 to Septem R	Penalty Jary 6, ber 30,	\$52,500
	Number of N Seven montl 2020 to May	daily weekly monthly quarterly semiannual annual single event 13, 2020, from Ply Extraordinary Ordinary N/A	x x x x x x x x x x x x x x x x x x x	to July 16, 2020 2020 NOE/NOV to EDP	es of non-compliance the 20, and from Septembe. RP/Settlement Offer ot meet the good faith of	Violation Base Nat occurred from Januar 15, 2020 to Septem R criteria for this	Penalty Lary 6, ber 30, eduction	\$52,500 \$0
	Number of N Seven montl 2020 to May	daily weekly monthly quarterly semiannual annual single event 13, 2020, from Ply Extraordinary Ordinary N/A	x x x x x x x x x x x x x x x x x x x	to July 16, 2020 2020 NOE/NOV to EDP	es of non-compliance the 20, and from Septembe. RP/Settlement Offer ot meet the good faith of	Violation Base Violation Base Nat occurred from Januar 15, 2020 to Septem R	Penalty Lary 6, ber 30, eduction	\$52,500
Good Faith	Number of N Seven montl 2020 to May	daily weekly monthly quarterly semiannual annual single event 13, 2020, from Ply Extraordinary Ordinary N/A Notes	x ecommended of July 15, 2020 0.0% sefore NOE/NOV x The Resp	to July 16, 2020 2020 NOE/NOV to EDP	es of non-compliance the 20, and from Septembe. RP/Settlement Offer ot meet the good faith of violation.	Violation Base Nat occurred from Januar 15, 2020 to Septem R criteria for this	Penalty Lary 6, ber 30, eduction	\$52,500 \$0
Good Faith	Seven montl 2020 to May	daily weekly monthly quarterly semiannual annual single event many events are re 13, 2020, from ply Extraordinary Ordinary N/A Notes	x ecommended of July 15, 2020 0.0% sefore NOE/NOV The Resp	NOE/NOV to EDP	es of non-compliance the 20, and from Septembe. RP/Settlement Offer ot meet the good faith of violation. Statutory	Violation Base Pat occurred from Januar 15, 2020 to Septem Recriteria for this Violation Septems	Penalty Jary 6, ber 30, eduction	\$52,500 \$0 \$52,500
Good Faith	Seven montl 2020 to May	daily weekly monthly quarterly semiannual annual single event 13, 2020, from Ply Extraordinary Ordinary N/A Notes	x ecommended of July 15, 2020 0.0% sefore NOE/NOV The Resp	to July 16, 2020 2020 NOE/NOV to EDP	es of non-compliance the 20, and from Septembe. RP/Settlement Offer ot meet the good faith of violation. Statutory	Violation Base Violation Base Pat occurred from Januar 15, 2020 to Septem R Criteria for this Violation 5	Penalty Jary 6, ber 30, eduction	\$52,500 \$0

	E	conomic	Benefit	Woı	'ksheet		
Respondent	INEOS USA LL	.C (PCW No. 4 of 4	l)				
Case ID No.	60882						
Reg. Ent. Reference No.	RN100238708	}					
Media Violation No.						Percent Interest	Years of Depreciation
7.0.00.011						5.0	15
	Item Cost	Date Required	Final Date	Yrs	Interest Saved	Costs Saved	EB Amount
Item Description							
Item Description							
Delayed Costs							
Equipment				0.00	\$0	\$0	\$0
Buildings				0.00	\$0	\$0	\$0
Other (as needed)				0.00	\$0	\$0	\$0
Engineering/Construction				0.00	\$0	\$0	\$0
Land				0.00	\$0	n/a	\$0
Record Keeping System				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	6-Jan-2020	1-Jan-2025	4.99	\$2,496	n/a	\$2,496
Notes for DELAYED costs	NOx emission	ns limit for Boiler 3	is the estim	uired is ated da	the first date of notes te of compliance.	and NH3 concentrat on-compliance and t	the Final Date
Avoided Costs	ANNU	ALIZE avoided c	osts before en	tering	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		\$2,496

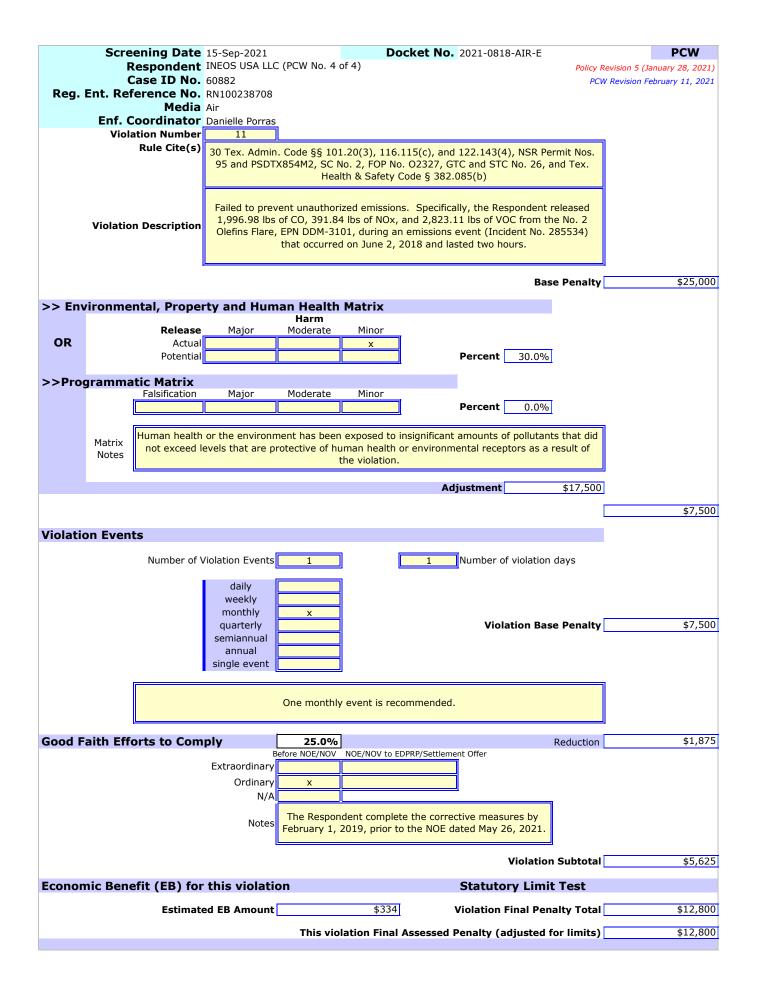
	E	conomic	Benefit	Wor	ksheet		
Respondent	INEOS USA LL	.C (PCW No. 4 of 4	1)				
Case ID No.							
Reg. Ent. Reference No.	RN100238708	}					
Media Violation No.	Air					Percent Interest	Years of Depreciation
2.0.00.0						5.0	15
	Item Cost	Date Required	Final Date	Yrs	Interest Saved	Costs Saved	EB Amount
Item Description							
Item Description							
Delayed Costs							
Equipment				0.00	\$0	\$0	\$0
Buildings				0.00	\$0	\$0	\$0
Other (as needed)				0.00	\$0	\$0	\$0
Engineering/Construction				0.00	\$0	\$0	\$0
Land				0.00	\$0	n/a	\$0
Record Keeping System				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	23-Feb-2020	1-Jan-2025	4.86	\$2,430	n/a	\$2,430
Notes for DELAYED costs		•	Date Required is	the firs		NOx, NH3, and SO2 pliance and the Fina	*
Avoided Costs	ANNU	ALIZE avoided c	osts before er	tering	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		\$2,430

		ening Date				cet No. 2021-0818-AIF	K-E	PCW
	R	espondent	INEOS USA LL	C (PCW No. 4	of 4)		Policy	Revision 5 (January 28, 2021)
	_	ase ID No.					PC	W Revision February 11, 2021
Reg.	Ent. Ref	erence No.	RN100238708	3				
		Media						
	Enf. C	oordinator	Danielle Porra	S				
	Viola	tion Number						=
		Rule Cite(s)	30 Tex. Admir	n. Code §§ 101	20(3), 116.115	5(b)(2)(F) and (c) , and 1	22.143(4), NSR Permit Nos.	1
							6, GTC and STC No. 7, and	
					Tex. Health & S	afety Code § 382.085(b))	
			Failed to com	ply with the MA	AERs. Specifical	ly, the Respondent excee	eded the CO MAER of 15.22	1
				. ,	•	,,	ours on April 16, 2020 and	
			April 19, 20	20, exceeded	the NOx MAER	of 4.17 lbs/hr by a range	from 0.01 lb/hr to 11.11	
	Violation	n Description					September 16, 2020, and	
		cccp	exceeded the				nge from 0.01 lb/hr to 0.47	
							20 for Boiler 3, EPN BLR3,	
			resulting in th	e unauthorized		.5 lbs of CO emissions, 3- bs of PM emissions.	40.17 lbs of NOx emissions,	
					anu 4.37 n	DS OF PM CHIISSIONS.		_
							Base Penalty	\$25,000
							base renarty	\$23,000
>> Env	/ironmer	ntal, Prope	rty and Hur	man Health	Matrix			
		<u> </u>	-	Harm				
		Release	Major	Moderate	Minor			
OR		Actual			X	_		
		Potential				Percent	30.0%	
> > D		tie Matrix						
>>Prog	gramma	tic Matrix Falsification	Major	Moderate	Minor			
		Taisincation	Major	Moderate	1411101	Percent	0.0%	
						, creciie	0.070	
								1
	Matrix				•	•	llutants that did not exceed	
	Notes	levels t	that are protec	tive of human	health or enviro	nmental receptors as a r	esult of the violation.	
	L							<u></u>
						A 42	1.15 500	-
						Aajus	stment \$17,500	
						Adjus	stment \$17,500	
						Adjus	stment \$17,500	\$7,500
Violatio	on Event	·s				Aajus	stment \$17,500	
Violatio	on Event	:s				Adjus	stment \$17,500	
Violatio	on Event		/iolation Events	s 7	1 🗆	Number of viol		
Violatio	on Event		/iolation Events	s <u>7</u>				
Violatio	on Event		/iolation Events	5 7]			
Violatio	on Event			s 7				
Violatio	on Event		daily weekly monthly	5 7 X			lation days	\$7,500
Violatio	on Event		daily weekly monthly quarterly					\$7,500
Violatio	on Event		daily weekly monthly quarterly semiannual				lation days	\$7,500
Violatio	on Event		daily weekly monthly quarterly semiannual annual	X			lation days	\$7,500
Violatio	on Event		daily weekly monthly quarterly semiannual	X			lation days	\$7,500
Violatio	on Event		daily weekly monthly quarterly semiannual annual	X			lation days	\$7,500
Violatio	on Event	Number of \	daily weekly monthly quarterly semiannual annual single event	x		35 Number of viol	Violation Base Penalty	\$7,500
Violatio	on Event	Number of \	daily weekly monthly quarterly semiannual annual single event	x		35 Number of viol	lation days Violation Base Penalty	\$7,500
		Number of \ Seven month 2020 to Ma	daily weekly monthly quarterly semiannual annual single event	x		35 Number of viol	Violation Base Penalty	\$7,500 \$52,500
		Number of \	daily weekly monthly quarterly semiannual annual single event	x	July 16, 2020,	35 Number of viol	Violation Base Penalty	\$7,500 \$52,500
		Number of \ Seven month 2020 to Ma	daily weekly monthly quarterly semiannual annual single event hly events are in ay 13, 2020, Ju	x recommended uly 15, 2020 to 0.0% Before NOE/NOV	July 16, 2020,	35 Number of viol	Violation Base Penalty t occurred from January 6, to September 16, 2020.	\$7,500 \$52,500
		Number of \ Seven month 2020 to Ma	daily weekly monthly quarterly semiannual annual single event nly events are in ay 13, 2020, Ju ply Extraordinary	x recommended uly 15, 2020 to 0.0% Before NOE/NOV	July 16, 2020,	Number of viol S of non-compliance that and from September 15,	Violation Base Penalty t occurred from January 6, to September 16, 2020.	\$7,500 \$52,500
		Number of \ Seven month 2020 to Ma	daily weekly monthly quarterly semiannual annual single event nly events are re ay 13, 2020, Ju ply Extraordinary Ordinary	x recommended uly 15, 2020 to 0.0% Before NOE/NOV	July 16, 2020,	Number of viol S of non-compliance that and from September 15,	Violation Base Penalty t occurred from January 6, to September 16, 2020.	\$7,500 \$52,500
		Number of \ Seven month 2020 to Ma	daily weekly monthly quarterly semiannual annual single event nly events are in ay 13, 2020, Ju ply Extraordinary	x recommended uly 15, 2020 to 0.0% Before NOE/NOV	July 16, 2020,	Number of viol S of non-compliance that and from September 15,	Violation Base Penalty t occurred from January 6, to September 16, 2020.	\$7,500 \$52,500
		Number of \ Seven month 2020 to Ma	daily weekly monthly quarterly semiannual annual single event ay 13, 2020, Ju ply Extraordinary Ordinary	x recommended uly 15, 2020 to 0.0% Before NOE/NOV	NOE/NOV to EDPR	Number of viol s of non-compliance that and from September 15,	Violation Base Penalty t occurred from January 6, to September 16, 2020. Reduction	\$7,500 \$52,500
		Number of \ Seven month 2020 to Ma	daily weekly monthly quarterly semiannual annual single event nly events are re ay 13, 2020, Ju ply Extraordinary Ordinary	x recommended uly 15, 2020 to 0.0% Before NOE/NOV	NOE/NOV to EDPR	Number of viol S of non-compliance that and from September 15,	Violation Base Penalty t occurred from January 6, to September 16, 2020. Reduction	\$7,500 \$52,500
		Number of \ Seven month 2020 to Ma	daily weekly monthly quarterly semiannual annual single event ay 13, 2020, Ju ply Extraordinary Ordinary	x recommended uly 15, 2020 to 0.0% Before NOE/NOV	NOE/NOV to EDPR	Number of viol s of non-compliance that and from September 15, RP/Settlement Offer t meet the good faith cri	Violation Base Penalty t occurred from January 6, to September 16, 2020. Reduction	\$7,500 \$52,500
		Number of \ Seven month 2020 to Ma	daily weekly monthly quarterly semiannual annual single event ay 13, 2020, Ju ply Extraordinary Ordinary	x recommended uly 15, 2020 to 0.0% Before NOE/NOV	NOE/NOV to EDPR	Number of viol s of non-compliance that and from September 15, RP/Settlement Offer t meet the good faith cri	Violation Base Penalty t occurred from January 6, to September 16, 2020. Reduction	\$7,500 \$52,500 \$0
		Number of \ Seven month 2020 to Ma	daily weekly monthly quarterly semiannual annual single event ay 13, 2020, Ju ply Extraordinary Ordinary	x recommended uly 15, 2020 to 0.0% Before NOE/NOV	NOE/NOV to EDPR	Number of viol s of non-compliance that and from September 15, RP/Settlement Offer t meet the good faith cri	Violation Base Penalty t occurred from January 6, to September 16, 2020. Reduction	\$7,500 \$52,500 \$0
Good F	aith Effc	Seven monti 2020 to Ma	daily weekly monthly quarterly semiannual annual single event ay 13, 2020, Ju ply Extraordinary Ordinary	x recommended aly 15, 2020 to 0.0% Before NOE/NOV X The Resp	NOE/NOV to EDPR	Number of viol s of non-compliance that and from September 15, RP/Settlement Offer t meet the good faith cri	Violation Base Penalty t occurred from January 6, to September 16, 2020. Reduction iteria for this Violation Subtotal	\$7,500 \$52,500 \$0
Good F	aith Effc	Seven month 2020 to Ma	daily weekly monthly quarterly semiannual annual single event ay 13, 2020, Ju ply Extraordinary Ordinary N/A	x recommended ally 15, 2020 to 0.0% Before NOE/NOV The Resp ion	NOE/NOV to EDPR	Statutory L	Violation Base Penalty t occurred from January 6, to September 16, 2020. Reduction iteria for this Violation Subtotal	\$7,500 \$52,500 \$0
Good F	aith Effc	Seven month 2020 to Ma	daily weekly monthly quarterly semiannual annual single event ay 13, 2020, Ju ply Extraordinary Ordinary N/A	x recommended ally 15, 2020 to 0.0% Before NOE/NOV The Resp ion	NOE/NOV to EDPR	S of non-compliance that and from September 15, RP/Settlement Offer ot meet the good faith criviolation. Statutory L Vice	Violation Base Penalty t occurred from January 6, to September 16, 2020. Reduction iteria for this Violation Subtotal	\$7,500 \$52,500 \$0 \$52,500 \$94,775

	E	conomic	Benefit	Wor	rksheet		
Respondent	INEOS USA LL	.C (PCW No. 4 of 4	1)				
Case ID No.							
Reg. Ent. Reference No.	RN100238708	}					
Media Violation No.	Air					Percent Interest	Years of Depreciation
						5.0	15
	Item Cost	Date Required	Final Date	Yrs	Interest Saved	Costs Saved	EB Amount
Item Description							
Item Description							
Delayed Costs							
Equipment	T T	1		0.00	\$0	\$0	\$0
Buildings				0.00	\$0	\$0 \$0	\$0
Other (as needed)				0.00	\$0	\$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	6-Jan-2020	1-Jan-2025	4.99	\$2,496	n/a	\$2,496
Notes for DELAYED costs		•	te Required is t	he first		, NOx, and PM hour ance and the Final I	,
Avoided Costs	ANNU	ALIZE avoided c	osts before er	tering	item (except for	one-time avoided	l 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		\$2,496



	E	conomic	Benefit	Wor	rksheet		
Respondent	INEOS USA LL	C (PCW No. 4 of	4)				
Case ID No.							
Reg. Ent. Reference No.	RN100238708						
Media	Air					Percent Interest	Years of
Violation No.	10					Percent Interest	Depreciation
						5.0	15
	Item Cost	Date Required	Final Date	Yrs	Interest Saved	Costs Saved	EB Amount
Item Description							
Delayed Costs				=			
Equipment				0.00	\$0	\$0	\$0
Buildings				0.00	\$0	\$0	\$0
Other (as needed)				0.00	\$0	\$0	\$0
Engineering/Construction				0.00	\$0	\$0	\$0 \$0
Land Record Keeping System				0.00	\$0 \$0	n/a 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	12-Mar-2021	27-Sep-2021	0.55	\$273	n/a	\$273
Notes for DELAYED costs	conduct switch than 10 secon	hing only on an a nds in order to pre	s needed basis, event the recurr Date Required is	and cald ence of the da	culate and verify the emissions events of the control of the contr	oment insulation for nat capacitor chargir due to the same or s vent began and the	ng time is less similar causes
Avoided Costs	ANNU	ALIZE avoided o	osts before en	tering		one-time avoided	
Disposal				0.00	\$0	\$0	\$0
Personnel				0.00	\$0	\$0	\$0
Inspection/Reporting/Sampling				0.00	\$0	\$0 #0	\$0 \$0
Supplies/Equipment Financial Assurance				0.00	\$0 \$0	\$0 \$0	\$0 \$0
ONE-TIME avoided costs				0.00	\$0	\$0 \$0	\$0
Other (as needed)				0.00	\$0	\$0	\$0
Notes for AVOIDED costs		,		,, 0.00	<u> </u>	Ţ	
Approx. Cost of Compliance		\$10,000			TOTAL		\$273



	E	conomic	Benefit	Woı	rksheet		
Respondent	INEOS USA LL	C (PCW No. 4 of 4	!)				
Case ID No.	60882						
Reg. Ent. Reference No.							
Media						Percent Interest	Years of
Violation No.	11						Depreciation
						5.0	15
	Item Cost	Date Required	Final Date	Yrs	Interest Saved	Costs Saved	EB Amount
Item Description							
51 16 1							
Delayed Costs Equipment		1		0.00	\$0	\$0	\$0
Buildings				0.00	\$0	\$0 \$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 Permit Costs				0.00	\$0 \$0	n/a n/a	\$0 \$0
Other (as needed)	\$10,000	2-Jun-2018	1-Feb-2019	0.67	\$334	n/a	\$334
Notes for DELAYED costs	Hand Indicat describe met ("DCS") dis	ing Control valve in the including the control of t	is still open, cre nace logic to tak order to prever 285534. The D	ate a gue furnace of the furnace of	un drill procedure to ce to safe state, ar ccurrence of emissi	going to offline dec o detail response to id update Digital Co ons events due to the emissions event	incident and ntrol System ne same or
Avoided Costs	ANNU	ALIZE avoided c	osts before er	tering	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 ONE-TIME avoided costs				0.00	\$0 \$0	\$0 \$0	\$0 \$0
Other (as needed)				0.00	\$0	\$0 \$0	\$0
Notes for AVOIDED costs)		1 0.00	1 40	Ψ0	
Approx. Cost of Compliance		\$10,000			TOTAL		\$334

	E	conomic	Benefit	Woi	'ksheet		
Respondent	INEOS USA LL	.C (PCW No. 4 of 4	1)				
Case ID No.	60882						
Reg. Ent. Reference No.	RN100238708	}					
Media						Percent Interest	Years of
Violation No.	12						Depreciation
						5.0	15
	Item Cost	Date Required	Final Date	Yrs	Interest Saved	Costs Saved	EB Amount
Item Description							
•							
Delayed Costs							
Equipment				0.00	\$0	\$0	\$0
Buildings				0.00	\$0	\$0	\$0
Other (as needed)				0.00	\$0	\$0	\$0
Engineering/Construction				0.00	\$0	\$0	\$0
Land				0.00	\$0	n/a	\$0
Record Keeping System				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	12-Apr-2021	19-Apr-2021	0.02	\$10	n/a	\$10
Notes for DELAYED costs	events due	to the same or si emissions e	milar causes as vent began and	Inciden the Fina	t No. 354056. The al Date is the date	<u> </u>	ne date the
Avoided Costs	ANNU	ALIZE avoided c	osts before en	tering	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		\$10

		ening Date				ocket No. 20	021-0818-AIR-E			PCW
		•	INEOS USA LLC	(PCW No. 4	of 4)			Policy R	evision 5 (Ja	anuary 28, 2021)
Dan		ase ID No.						PCW	Revision Fe	ebruary 11, 2021
Reg.	ent. Ker	erence No. Media	RN100238708							
	Enf. C		Danielle Porras							
		tion Number								
		Rule Cite(s)	30 Tex. Admin	. Code §§ 10	1,20(3), 116.	115(c), and 12	22.143(4), NSR Per	mit Nos.		
							and STC No. 26, a			
				Hea	Ith & Safety	Code § 382.08	5(b)			
							, the Respondent n			
	Violation	n Description					VOC from the No. 1 cident No. 291225)			
			,		-	2018 and laste	-			
							Rase	e Penalty		\$25,000
								. Charty		Ψ23/000
>> Env	vironmer	ital, Prope	rty and Hum	an Health Harm	Matrix					
		Release	Major	Harm Moderate	Minor					
OR		Actual			Х					
		Potential				P	ercent 30.0%			
>> Dro	aramma	tic Matrix								
//P10	yı alılılıa	Falsification	Major	Moderate	Minor					
						P	ercent 0.0%			
	Matrix				•	-	mounts of pollutant			
	Notes	not exceed i	eveis that are pr		uman neaith the violation.		ital receptors as a r	esuit or		
	L									
						Adju	stment	\$17,500		
								Ī		\$7,500
										1 /2 2 2
Violatio	on Event	:S								
		Number of \	/iolation Events	1]	1 N	umber of violation	days		
		,			- a					
			daily							
			weekly monthly	Х						
			quarterly				Violation Base	Penalty		\$7,500
			semiannual							1,722
			annual							
			single event							
				One monthly	y event is rec	ommended.				
Good F	aith Effo	rts to Com	ply	0.0%				Reduction		\$0
				efore NOE/NOV	NOE/NOV to E	DPRP/Settlement	Offer			
			Extraordinary							
			Ordinary N/A	X						
			14/7							
			Notes	The Respond		meet the good violation.	d faith criteria for			
					Cilis					
							Violation	Subtotal		\$7,500
Econon	nic Bene	fit (EB) for	this violation	on		S	Statutory Limit	Test		
					#2.062		_			#14 CZE
		Estimate	ed EB Amount		\$2,962	•	olation Final Pena	-		\$14,675
				This vio	lation Final	Assessed Pe	nalty (adjusted fo	or limits)		\$14,675

	E	conomic	Benefit	Wor	ksheet		
Respondent	INEOS USA LL	C (PCW No. 4 of 4	!)				
Case ID No.	60882						
Reg. Ent. Reference No.	RN100238708	3					
Media Violation No.	Air					Percent Interest	Years of Depreciation
Violation No.	13					5.0	15
	Item Cost	Date Required	Final Date	Yrs	Interest Saved	Costs Saved	EB Amount
Item Description							
Delayed Costs				_			
Equipment				0.00	\$0	\$0	\$0
Buildings				0.00	\$0	\$0	\$0
Other (as needed)				0.00	\$0	\$0	\$0
Engineering/Construction				0.00	\$0	\$0	\$0
Land				0.00	\$0	n/a	\$0
Record Keeping System				0.00	\$0	n/a	\$0
Training/Sampling				0.00	\$0	n/a	\$0
Remediation/Disposal				0.00	\$0	n/a	\$0
Permit Costs	110.000			0.00	\$0	n/a	\$0
Other (as needed)	\$10,000	28-Aug-2018	29-Jul-2024	5.92	\$2,962	n/a	\$2,962
Notes for DELAYED costs	outlet temp similar cause	perature control in es as Incident No.	order to preve 291225. The D the Final Date	nt the re ate Req e is the o	ecurrence of emiss uired is the date to date of compliance		he same or occurred and
Avoided Costs	ANNU	ALIZE avoided c	osts before er	tering	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		\$2,962

aith Efforts to Cor	monthly quarterly semiannual annual single event mply Extraordinary Ordinary N/A Notes	25.0% Defore NOE/NOV No. X The Responde December 20,	•	R	eduction Subtotal Test	\$1,875 \$1,875 \$5,625
	monthly quarterly semiannual annual single event mply Extraordinary Ordinary N/A Notes	One monthly e	DE/NOV to EDPRP/Set nt complete the c, 2019, prior to th	ded. R ttlement Offer prrective measures by e NOE dated June 30, Violation 5	eduction Subtotal	\$1,875
aith Efforts to Cor	monthly quarterly semiannual annual single event mply Extraordinary Ordinary N/A	One monthly e 25.0% Sefore NOE/NOV NO X The Responde	DE/NOV to EDPRP/Set nt complete the c, 2019, prior to th	ded. R tlement Offer orrective measures by e NOE dated June 30,	eduction	\$1,875
aith Efforts to Cor	monthly quarterly semiannual annual single event mply Extraordinary Ordinary N/A	One monthly e 25.0% Sefore NOE/NOV NO X The Responde	DE/NOV to EDPRP/Set nt complete the c, 2019, prior to th	ded. R tlement Offer porrective measures by		. ,
aith Efforts to Cor	monthly quarterly semiannual annual single event mply Extraordinary Ordinary	One monthly e	DE/NOV to EDPRP/Set	ded. R tlement Offer		. ,
aith Efforts to Cor	monthly quarterly semiannual annual single event mply Extraordinary	One monthly e		ded. R		. ,
aith Efforts to Cor	monthly quarterly semiannual annual single event	One monthly e		ded. R		
aith Efforts to Cor	monthly quarterly semiannual annual single event	One monthly e		ded. R		. ,
	monthly quarterly semiannual annual		vent is recommen		Penalty	\$7,500
	monthly quarterly semiannual annual		want is recommen		Penalty	\$7,500
	monthly quarterly semiannual annual	X		Violation Base	Penalty	\$7,500
	monthly quarterly semiannual	X		Violation Base	Penalty	\$7,500
	monthly	X		Violation Base	Penalty	\$7,500
	*					
	_				, -	
	Violation Events	1	1	Number of violation d	ays	
on Events						. , , , , , ,
						\$7,500
				Adjustment	\$17,500	
Notes not exceed	levels that are p			onmental receptors as a re	esult of	
Matrix				· ·		
	- 7			Percent 0.0%		
grammatic Matrix Falsification	Major	Moderate	Minor			
	11			Percent 30.0%		
Actua	nl	rioderate	X	Payant 20.00		
	_	Harm				
vironmental, Prope	erty and Hum	nan Health M	atrix			
				Base	Penalty	\$25,000
	29332	28) that began o	n September 29,	2018 and lasted 13 hours.		
Violation Description	563.86 lbs of	VOC as fugitive	emissions, during	an emissions event (Incide		
		X854M2, SC No.	2, FOP No. O232	7, GTC and STC No. 26, an		
	\ <u> </u>	. Code §§ 101.2	0(3), 116.115(c).	and 122.143(4), NSR Perr	nit Nos.	
		1				
Case ID No	60882					Revision February 11, 2021
_	•	C (PCW No. 4 of		NO. 2021-0818-AIR-E	Policy Rev	PCW rision 5 (January 28, 2021)
	Respondent Case ID No Ent. Reference No Media Enf. Coordinato Violation Numbe Rule Cite(s Violation Description Release Actua Potentia grammatic Matrix Falsification Matrix Notes Matrix Notes Matrix Notes	Respondent Case ID No. 60882 RN100238708 Media Enf. Coordinator Violation Number Rule Cite(s) Violation Description Failed to prev 563.86 lbs of 29333 Vironmental, Property and Hum Release Major Actual Potential Grammatic Matrix Falsification Major Matrix Notes Matrix Notes Notes Notes Notes Notes Notes INEOS USA LLC 60882 RN100238708 Air Danielle Porras 653.86 lbs of 29333	Respondent Case ID No. Ent. Reference No. Media Finf. Coordinator Violation Number Rule Cite(s) Violation Description Failed to prevent unauthorize 563.86 lbs of VOC as fugitive 293328) that began of Violation Major Release Actual Potential Matrix Notes Number of Violation Events Number of Violation Events INEOS USA LLC (PCW No. 4 of 4 of 4 of 4 of 4 of 4 of 4 of 4	Respondent Case ID No. 60882 Ent. Reference No. RN100238708 Media Air Enf. Coordinator Danielle Porras Violation Number Rule Cite(s) Violation Description Violation Description Violation Description Release Major Moderate Minor Actual Potential Matrix Notes Number of Violation Events Number of Violation Events Number of Violation Events Madia Air Release Najor Moderate Minor Moderate	Case ID No. 60882 Ent. Reference No. RN100238708 Media Air Enf. Coordinator Danielle Porras Violation Number Rule Cite(s) 30 Tex. Admin. Code §§ 101.20(3), 116.115(c), and 122.143(4), NSR Perry 95 and PSDTX854M2, SC No. 2, FOP No. 02327, GTC and STC No. 26, and Health & Safety Code § 382.085(b) Failed to prevent unauthorized emissions. Specifically, the Respondent response to the safety code § 382.085(b) Failed to prevent unauthorized emissions, during an emissions event (Incide 293328) that began on September 29, 2018 and lasted 13 hours. Base Pironmental, Property and Human Health Matrix Harm Release Major Moderate Minor Actual Actu	Respondent INEOS USA LLC (PCW No. 4 of 4) Case ID No. 60882 Ent. Reference No. RN100238708 Media Air Enf. Coordinator Danielle Porras Violation Number 14 Rule Cite(s) 30 Tex. Admin. Code §§ 101.20(3), 116.115(c), and 122.143(4), NSR Permit Nos. 95 and PSDTX854M2, SC No. 2, FOP No. 02327, GTC and STC No. 26, and Tex. Health & Safety Code § 382.085(b) Failed to prevent unauthorized emissions. Specifically, the Respondent released 563.86 lbs of VOC as fugitive emissions, during an emissions event (Incident No. 293328) that began on September 29, 2018 and lasted 13 hours. Base Penalty Fironmental, Property and Human Health Matrix Harm Release Major Moderate Minor Actual Potential Noderate Minor Actual Potential Property and Major Moderate Minor Actual Potential Property and Major Moderate Minor Actual Potential Property and Major Moderate Minor Actual Potential Property Major Moderate Minor Actual Potential Property Major Moderate Minor Actual Property Major Moderate Minor Percent 0.0% Matrix Notes Major Moderate Minor Percent 10.0% Matrix Notes Number of Violation Events 1 Number of violation days Adjustment \$17,500

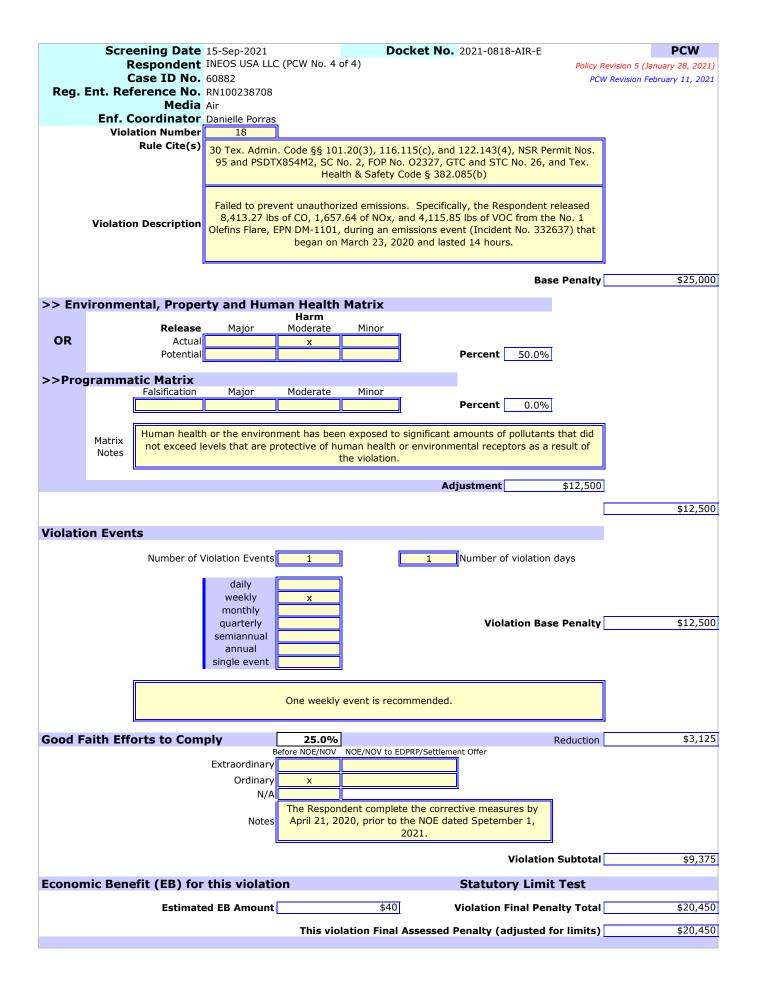
	E	conomic	Benefit	Woı	ksheet		
Respondent	INEOS USA LL	C (PCW No. 4 of 4	1)				
Case ID No.	60882						
Reg. Ent. Reference No.							
Media						Percent Interest	Years of
Violation No.	14						Depreciation
						5.0	15
	Item Cost	Date Required	Final Date	Yrs	Interest Saved	Costs Saved	EB Amount
Item Description							
Delayed Costs		1		1			
Equipment				0.00	\$0	\$0	\$0
Buildings				0.00	\$0 \$0	\$0 \$0	\$0 \$0
Other (as needed) Engineering/Construction				0.00	\$0 \$0	\$0 \$0	\$0 \$0
Land				0.00	\$0	n/a	\$0
Record Keeping System				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	29-Sep-2018	20-Dec-2019	1.22	\$612	n/a	\$612
Notes for DELAYED costs	add a low ve units to vario events due to	locity operating e ous towers to help the same or simi	nvelope point to ensure adequa ilar causes as In	track a te resid cident N	nd prevent low flow ual in order to prevalors. 293328 and 2	to help ensure adeq w, and add DEHA al vent the recurrence 97512. The Date R e date of compliance	of emissions equired is the
Avoided Costs	ANNU	ALIZE avoided c	osts before en	tering	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 ONE-TIME avoided costs				0.00	\$0 \$0	\$0 \$0	\$0 \$0
Other (as needed)				0.00	\$0	\$0	\$0
Notes for AVOIDED costs				0.00	1 40	- Ψ - I	4 0
Approx. Cost of Compliance		\$10,000			TOTAL		\$612

	Date 15-Sep-2021	Docket No. 2021-0818-AIR-E	PCW
Respor	ndent INEOS USA LLC (PCW No	. 4 of 4)	Policy Revision 5 (January 28, 2021)
Case I	D No. 60882		PCW Revision February 11, 2021
Reg. Ent. Referenc	e No. RN100238708		
N	1edia Air		
Enf. Coordi	nator Danielle Porras		
Violation N	umber 15		
Rule (Cite(s) 30 Tex Admin Code 88	101.20(3), 116.115(c), and 122.143(4), NSR Permit I	Voc
	Jo Tex. Admin. Code 99	SC No. 2, FOP No. 02327, GTC and STC No. 26, and To	
		Health & Safety Code § 382.085(b)	20.
		Treatin & Surety Code § 502.005(b)	
Violation Desci		chorized emissions. Specifically, the Respondent releasingitive emissions, during an emissions event (Incident	
Violation Desci		urred on November 19, 2018 and lasted nine hours.	NO.
	29/312) that occ	urred on November 19, 2010 and lasted fille flours.	
		Base Pe	nalty \$25,000
>> Environmental, F	Property and Human Hea		
_	Harm elease Maior Modera		
OR	elease Major Modera Actual		
	otential	Percent 30.0%	
1	oteritiai	Percent 30.0 %	
>>Programmatic Ma	atrix		
	cation Major Modera	te Minor	
		Percent 0.0%	
Human	health or the environment has b	peen exposed to insignificant amounts of pollutants tha	t did
Matrix Notes not e	exceed levels that are protective of	of human health or environmental receptors as a result	of
Notes		the violation.	
		Adjustment \$1	7,500
			\$7,500
			4.723
Violation Events			
Num	ber of Violation Events 1	1 Number of violation days	
	al a the c		
	daily		
	weekly		
	monthly x	Violation Base Pe	nalty \$7,500
	quarterly semiannual	Violation base Fe	11aity \$7,300
	annual		
	single event		
	Single event		
	One mor	nthly event is recommended.	
015-12 50			
Good Faith Efforts to		NOV NOE/NOV to EDPRP/Settlement Offer	stion \$1,875
	Extraordinary	NOL/NOV to LOFRE/Settlement oner	
	· ·		
	,		
	N/A		
		spondent complete the corrective measures by ber 20, 2019, prior to the NOE dated June 30,	
	Notes	2021.	
		Violation Sub	total \$5,625
Economic Benefit (E	R) for this violation	Statutory Limit Te	-t
Leonomic Deficit (E	b) for this violation		
E:	stimated EB Amount	\$0 Violation Final Penalty	Total \$12,800
		violation Final Assessed Penalty (adjusted for li	mits) \$12,800
	Thic		

	E	conomic	Benefit	Woı	ksheet		
Respondent	INEOS USA LL	C (PCW No. 4 of 4	1)				
Case ID No.	60882	•					
Reg. Ent. Reference No.							
Media							Years of
Violation No.						Percent Interest	Depreciation
Violation No.	13					5.0	15
	Item Cost	Date Required	Final Date	Yrs	Interest Saved	Costs Saved	EB Amount
Item Description							
zeem Besempelon							
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)				0.00	\$0	n/a	\$0
Notes for DELAYED costs	ANNU				on No. 14 of PCW	No. 4 of 4.	L costs)
Avoided Costs	ANNO	ALIZE avoided C	osts before er	0.00	\$0	\$0	\$0
Disposal Personnel				0.00	\$0 \$0	\$0 \$0	\$0 \$0
Inspection/Reporting/Sampling				0.00	\$0 \$0	\$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		\$0			TOTAL		\$0

	E	conomic	Benefit	Wor	ksheet		
Respondent	INEOS USA LL	C (PCW No. 4 of	1)				
Case ID No.	60882						
Reg. Ent. Reference No.	RN100238708						
Media Violation No.						Percent Interest	Years of Depreciation
						5.0	15
	Item Cost	Date Required	Final Date	Yrs	Interest Saved	Costs Saved	EB Amount
Item Description							
Delayed Costs							
Equipment				0.00	\$0	\$0	\$0
Buildings				0.00	\$0	\$0	\$0
Other (as needed)				0.00	\$0	\$0	\$0
Engineering/Construction				0.00	\$0	\$0	\$0
Land				0.00	\$0	n/a	\$0
Record Keeping System				0.00	\$0	n/a	\$0
Training/Sampling				0.00	\$0	n/a	\$0
Remediation/Disposal				0.00	\$0	n/a	\$0
Permit Costs	\$10,000	13-Aug-2020	26 May 2022	0.00	\$0 \$1,392	n/a n/a	\$0 \$1,392
Other (as needed)							
Notes for DELAYED costs	develop an in the package	spection and test prior to final sign-	ing plan to ident off in order to p o. 340661. The	ify and event to Date Re	document any issu the recurrence of e	ses non-conformance that need to be emissions events due the emissions events.	addressed on the to the same
Avoided Costs	ANNU	ALIZE avoided c	osts before en	tering	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		\$1,392

	E	conomic	Benefit	Wor	ksheet		
Respondent	INEOS USA LL	C (PCW No. 4 of 4	l)				
Case ID No.	60882						
Reg. Ent. Reference No.	RN100238708						
Media						Percent Interest	Years of
Violation No.	17						Depreciation
						5.0	15
	Item Cost	Date Required	Final Date	Yrs	Interest Saved	Costs Saved	EB Amount
Item Description							
Delayed Costs	<u> </u>	-1r		1			
Equipment				0.00	\$0	\$0 #0	\$0 ¢0
Buildings Other (as needed)				0.00	\$0 \$0	\$0 \$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	15-Aug-2020	21-Oct-2022	2.18	\$1,092	n/a	\$1,092
Notes for DELAYED costs	vibration, u critical applic design and a	pdate Project Descations, and update occupants of the project of t	sign Basis Templ te the Relief Sys ibration in order ncident No. 3406	ate to c tem De to prev 81. Th	capture a review of sign Guide to include the recurrence of the re	uate acoustic and fl bypass scope contride considerations a e of emissions event the date the emiss pliance.	ol valves in round piping s due to the
Avoided Costs	ANNU	ALIZE avoided c	osts before en	tering	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 Other (as needed)				0.00	\$0 \$0	\$0 \$0	\$0 \$0
Notes for AVOIDED costs		1		0.00	Φ0	3 0	3 0
Approx. Cost of Compliance		\$10,000			TOTAL		\$1,092



	E	conomic	Benefit	Woi	'ksheet		
Respondent Case ID No. Reg. Ent. Reference No.	60882	C (PCW No. 4 of 4	1)				
Media Violation No.	Air					Percent Interest	Years of Depreciation
						5.0	15
	Item Cost	Date Required	Final Date	Yrs	Interest Saved	Costs Saved	EB Amount
Item Description							
Delayed Costs				_			
Equipment				0.00	\$0	\$0	\$0
Buildings				0.00	\$0	\$0	\$0
Other (as needed)				0.00	\$0	\$0	\$0
Engineering/Construction				0.00	\$0	\$0	\$0
Land				0.00	\$0	n/a	\$0
Record Keeping System				0.00	\$0	n/a	\$0
Training/Sampling				0.00	\$0	n/a	\$0
Remediation/Disposal				0.00	\$0	n/a	\$0
Permit Costs	+10.000	22.14	24 4 2020	0.00	\$0	n/a	\$0
Other (as needed)	\$10,000	23-Mar-2020		0.08	\$40	n/a	\$40
Notes for DELAYED costs	in order to p	revent the recurre	ence of emission	s event	s due to the same ons event began ar	applicable variable f or similar causes as nd the Final Date is	Incident No.
Avoided Costs	ANNU	ALIZE avoided c	osts before en	tering	item (except for	one-time avoided	l 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		\$40

			15-Sep-2021			ket No. 2021-0818-AIR-E		PCW
	Res	pondent	INEOS USA LLC	(PCW No. 4	of 4)		Policy R	evision 5 (January 28, 2021)
		e ID No.					PCV	/ Revision February 11, 2021
Reg.	Ent. Refer		RN100238708					
		Media						
			Danielle Porras	1				
		n Number	19					1
	RI	ıle Cite(s)				5(c), and 122.143(4), NSR		
			95 and PSDT			02327, GTC and STC No. 26	, and Tex.	
				неа	ith & Safety Co.	de § 382.085(b)		
						Specifically, the Responder		
	Violation D	escription				nd 12,270.70 lbs of VOC frossions event (Incident No. 3		
			Oleillis Flare, L		_	and lasted nine hours.	33131) tilat	
		L						
						В	ase Penalty	\$25,000
>> Env	vironmenta	al, Proper	rty and Hum	an Health	Matrix			
			-	Harm				
0.0		Release	Major	Moderate	Minor			
OR		Actual Potential		X		Percent 50.0	0/0	
		roteiitiai				Percent 30.0	70	
>>Pro	grammatic	Matrix						
•		alsification	Major	Moderate	Minor		<u></u>	
						Percent 0.0	%	
	Matrix B:					dent, human health or the e		
	Notes				•	that did not exceed levels to otors as a result of the viola		
		protect	ctive of fidition i	icaicii oi ciivii	Tommental recep	otors as a result of the viola	cioii.	
						Adjustment	\$12,500	
								+12.500
								\$12,500
Violatio	on Events							
		Number of V	iolation Events/	1		1 Number of violation	on days	
			مادان		1			
			daily weekly	.,				
			monthly	X				
			quarterly			Violation B	ase Penalty	\$12,500
			semiannual				-	•
			annual					
			single event					
				One weekly	event is recom	mended		
				0.10 11001117				
			-		1			10.105
Good F	aith Effort	s to Com		25.0% efore NOE/NOV		RP/Settlement Offer	Reduction	\$3,125
			Extraordinary	elore NOL/NOV	NOL/NOV to EDFI	XF/Settlement Onei		
			Ordinary	Х				
			N/A	Α				
			,/.	The Respon	dent complete	the corrective measures by		
			Notes	March 31, 2	2021, prior to th	e NOE dated September 8,		
					20	21.		
						Violati	on Subtotal	\$9,375
						violati	on Subtotal	φ5,373
Econon	nic Benefit	(EB) for	this violation	on		Statutory Lin	nit Test	
		Estimate	ed EB Amount		\$499	Violation Final P	enalty Total	\$20,450
			•	Th''	lation First C		-	
				i nis vio	iation Final As	ssessed Penalty (adjuste	a for limits)	\$20,450

	E	conomic	Benefit	Woi	'ksheet		
Respondent Case ID No. Reg. Ent. Reference No.	60882	C (PCW No. 4 of 4	1)				
Media Violation No.	Air					Percent Interest	Years of Depreciation
						5.0	15
	Item Cost	Date Required	Final Date	Yrs	Interest Saved	Costs Saved	EB Amount
Item Description							
Delayed Costs							
Equipment				0.00	\$0	\$0	\$0
Buildings				0.00	\$0	\$0	\$0
Other (as needed)				0.00	\$0	\$0	\$0
Engineering/Construction				0.00	\$0	\$0	\$0
Land				0.00	\$0	n/a	\$0
Record Keeping System				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	1-Apr-2020	31-Mar-2021	1.00	\$499	n/a	\$499
Notes for DELAYED costs	Estimated cost to develop communication protocols and training for operators on the proper radio etiquette in order to prevent the recurrence of emissions events due to the same or similar causes as Incident No. 333191. The Date Required is the date the emissions event occurred and the Final Date is the date of compliance.						
Avoided Costs	ANNUALIZE avoided costs before entering item (except for one-time avoided costs)						
Disposal				0.00	\$0	\$0	\$0
Personnel				0.00	\$0	\$0	\$0
Inspection/Reporting/Sampling				0.00	\$0	\$0	\$0
Supplies/Equipment				0.00	\$0	\$0	\$0
Financial Assurance				0.00	\$0	\$0	\$0
ONE-TIME avoided costs				0.00	\$0	\$0	\$0
Other (as needed)				0.00	\$0	\$0	\$0
Notes for AVOIDED costs							
Approx. Cost of Compliance		\$10,000			TOTAL		\$499

	E	conomic	Benefit	Woı	rksheet		
Respondent	INEOS USA LL	C (PCW No. 4 of 4	1)				
Case ID No.	60882						
Reg. Ent. Reference No.							
Media						Percent Interest	Years of
Violation No.	20						Depreciation
						5.0	15
	Item Cost	Date Required	Final Date	Yrs	Interest Saved	Costs Saved	EB Amount
Item Description							
Delayed Costs		1		1			
Equipment				0.00	\$0	\$0	\$0
Buildings				0.00	\$0	\$0	\$0
Other (as needed)				0.00	\$0 \$0	\$0 \$0	\$0 \$0
Engineering/Construction Land				0.00	\$0	n/a	\$0 \$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	4-Nov-2019	10-Feb-2020	0.27	\$134	n/a	\$134
Notes for DELAYED costs	disassembly head, cleanling order to pre	and reassembly, ess requirements vent the recurren	including verific and maintenand ace of emissions	ation of e witne events	complete lifting no ssing nitrogen preduce to the same of the same of the same	lure to include detai ut disengagement fr ssure test of re-asse ir similar causes as l and the Final Date is	om the filter embled filter in incident No.
Avoided Costs	ANNU	ALIZE avoided c	osts before en	tering	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		\$134

Respondent	15-Sep-2021			et No. 2021-0818-AIR-E	PCW
• • • • • • • • • • • • • • • • • • •	INEOS USA LLC	(PCW No. 4 o	of 4)	Poli	cy Revision 5 (January 28, 2021)
Case ID No.					PCW Revision February 11, 2021
Reg. Ent. Reference No.					
Media					
Enf. Coordinator					
Violation Number	21				_
Rule Cite(s)	30 Tex. Admin.	. Code §§ 101	1.20(3), 116.115(c), and 122.143(4), NSR Permit No.	5.
		(854M2, SC N	No. 2, FOP No. O2	327, GTC and STC No. 26, and Tex.	
		Heal	Ith & Safety Code	§ 382.085(b)	
	Failed to prev	ent unauthori	ized emissions. S	pecifically, the Respondent released	
Violation Description				.82 lbs of VOC from the No. 1 Olefin	
Violation Description	Flare, EPN [event (Incident No. 339521) that	
		occurred on	n July 24, 2020 ar	nd lasted 50 minutes.	
				Base Pena	lty \$25,000
				20001 0110	Ψ20/000
>> Environmental, Prope	rty and Hum		Matrix		
Release	Major	Harm Moderate	Minor		
OR Actual		···uciate	X		
Potential				Percent 30.0%	
	,				
>>Programmatic Matrix					
Falsification	Major	Moderate	Minor	_	
				Percent 0.0%	
				nificant amounts of pollutants that o	
Notes Notes	eveis triat are pr		the violation.	ivironmental receptors as a result of	
			the violation.		
				Adjustment \$17,5	00
					\$7,500
Violation Events					
Violation Events					
Number of \	Violation Events	1		1 Number of violation days	
	_				
	daily				
	weekly				
	and the state of t				
	monthly	Х		Violeties Page Page	¢7.500
	quarterly	Х		Violation Base Pena	s7,500
	quarterly semiannual	X		Violation Base Pena	\$7,500
	quarterly	X		Violation Base Pena	\$7,500
	quarterly semiannual annual	X		Violation Base Pena	\$7,500
	quarterly semiannual annual				\$7,500
	quarterly semiannual annual		v event is recomm		\$7,500
	quarterly semiannual annual		v event is recomm		\$7,500
Good Faith Efforts to Com	quarterly semiannual annual single event		v event is recomm		
Good Faith Efforts to Com	quarterly semiannual annual single event	One monthly 25.0%		nended. Reducti	
Good Faith Efforts to Com	quarterly semiannual annual single event	One monthly 25.0%		nended. Reducti	
Good Faith Efforts to Com	quarterly semiannual annual single event	One monthly 25.0%		nended. Reducti	
Good Faith Efforts to Com	quarterly semiannual annual single event single event september 2 Extraordinary	One monthly 25.0% efore NOE/NOV		nended. Reducti	
Good Faith Efforts to Com	quarterly semiannual annual single event ply Extraordinary Ordinary N/A	One monthly 25.0% efore NOE/NOV X The Respon	NOE/NOV to EDPRP/	Reducti Settlement Offer e corrective measures by	
Good Faith Efforts to Com	quarterly semiannual annual single event aply Extraordinary Ordinary	One monthly 25.0% efore NOE/NOV X The Respon	NOE/NOV to EDPRP/	Reduction Settlement Offer Settlement Of	
Good Faith Efforts to Com	quarterly semiannual annual single event ply Extraordinary Ordinary N/A	One monthly 25.0% efore NOE/NOV X The Respon	NOE/NOV to EDPRP/	Reduction Settlement Offer Settlement Of	
Good Faith Efforts to Com	quarterly semiannual annual single event ply Extraordinary Ordinary N/A	One monthly 25.0% efore NOE/NOV X The Respon	NOE/NOV to EDPRP/	Reduction Settlement Offer Settlement Of	on \$1,875
	quarterly semiannual annual single event ply Extraordinary Ordinary N/A Notes	One monthly 25.0% efore NOE/NOV X The Respon November 30	NOE/NOV to EDPRP/	Reduction Settlement Offer the corrective measures by the NOE dated October 12, the NOE dated Oc	on \$1,875
Good Faith Efforts to Com Economic Benefit (EB) for	quarterly semiannual annual single event ply Extraordinary Ordinary N/A Notes	One monthly 25.0% efore NOE/NOV X The Respon November 30	NOE/NOV to EDPRP/	Reduction Settlement Offer Settlement Offer Settlement Offer Set Corrective measures by the NOE dated October 12, 1.	on \$1,875
Economic Benefit (EB) for	quarterly semiannual annual single event ply Extraordinary Ordinary N/A Notes	One monthly 25.0% efore NOE/NOV X The Respon November 30	NOE/NOV to EDPRP/	Reduction Settlement Offer the corrective measures by the NOE dated October 12, the NOE dated Oc	on \$1,875
Economic Benefit (EB) for	quarterly semiannual annual single event extraordinary Ordinary N/A Notes	One monthly 25.0% efore NOE/NOV X The Respon November 30	NOE/NOV to EDPRP/ dent complete the complete of the complete o	Reducti Settlement Offer e corrective measures by the NOE dated October 12, the NOE dated Statutory Limit Test	tal \$5,625

	E	conomic	Benefit	Wor	'ksheet		
Respondent	INEOS USA LL	C (PCW No. 4 of 4	1)				
Case ID No.	60882						
Reg. Ent. Reference No.	RN100238708						
Media	Air					Percent Interest	Years of
Violation No.	21					reiteilt Interest	Depreciation
						5.0	15
	Item Cost	Date Required	Final Date	Yrs	Interest Saved	Costs Saved	EB Amount
Item Description							
Delayed Costs							
Equipment				0.00	\$0	\$0	\$0
Buildings				0.00	\$0	\$0	\$0
Other (as needed)				0.00	\$0	\$0	\$0
Engineering/Construction				0.00	\$0	\$0	\$0
Land				0.00	\$0	n/a	\$0
Record Keeping System				0.00	\$0	n/a	\$0
Training/Sampling				0.00	\$0	n/a	\$0
Remediation/Disposal				0.00	\$0	n/a	\$0
Permit Costs	110.000	2171222		0.00	\$0	n/a	\$0
Other (as needed)	\$10,000	24-Jul-2020	30-Nov-2020	0.35	\$177	n/a	\$177
Notes for DELAYED costs	recurrence Require	of emissions ever d is the date the e	nts due to the s emissions event	occurre	similar causes as I d and the Final Da	are made in order t ncident No. 339521 te is the date of cor	. The Date npliance.
Avoided Costs	ANNU	ALIZE avoided c	osts before er			one-time avoided	
Disposal				0.00	\$0 \$0	\$0 \$0	\$0 ¢0
Personnel Inspection/Reporting/Sampling				0.00	\$0 \$0	\$0 \$0	\$0 \$0
Supplies/Equipment				0.00	\$0 \$0	\$0 \$0	\$0 \$0
Financial Assurance				0.00	\$0 \$0	\$0 \$0	\$0 \$0
ONE-TIME avoided costs				0.00	\$0	\$0	\$0
Other (as needed)				0.00	\$0	\$0	\$0
Notes for AVOIDED costs				, 0.00	, Ç	Ţ	ŢŨ
Approx. Cost of Compliance		\$10,000			TOTAL		\$177

			Dellell	VV OI	rksheet		
Respondent	INEOS USA LL	C (PCW No. 4 of 4	!)				
Case ID No.	60882						
Reg. Ent. Reference No.	RN100238708						
Media	Air					Percent Interest	Years of
Violation No.	22					reiteilt Interest	Depreciation
						5.0	15
	Item Cost	Date Required	Final Date	Yrs	Interest Saved	Costs Saved	EB Amount
Item Description		•					
Delayed Costs				_			
Equipment				0.00	\$0	\$0	\$0
Buildings				0.00	\$0	\$0	\$0
Other (as needed)				0.00	\$0	\$0	\$0
Engineering/Construction				0.00	\$0	\$0	\$0
Land				0.00	\$0	n/a	\$0
Record Keeping System				0.00	\$0	n/a	\$0
Training/Sampling				0.00	\$0 \$0	n/a	\$0 \$0
Remediation/Disposal Permit Costs				0.00	\$0	n/a n/a	\$0 \$0
Other (as needed)	\$10,000	4-Nov-2018	3-Apr-2019	0.00	\$205	n/a	\$205
other (as needed)							
Notes for DELAYED costs	feed to the	furnace and dev	elop training for	operat	ions to allow board	lighting burners whi I operators to practi event the recurrence	ce feeding
						e Date Required is t	
					al Date is the date	•	
Avoided Costs	ANNUA	ALIZE avoided c	osts before en			one-time avoided	
Disposal				0.00	\$0 \$0	\$0	\$0
Personnel Inspection/Reporting/Sampling				0.00	\$0 \$0	\$0 \$0	\$0 \$0
Supplies/Equipment				0.00	\$0 \$0	\$0 \$0	\$0 \$0
Financial Assurance				0.00	\$0 \$0	\$0 \$0	\$0 \$0
ONE-TIME avoided costs				0.00	\$0	\$0	\$0
Other (as needed)				0.00	\$0	\$0	\$0
, ,						7.7	
Notes for AVOIDED costs							
Approx. Cost of Compliance		\$10,000			TOTAL		\$205

	E	conomic	Benefit	Wor	ksheet		
Respondent	INEOS USA LL	C (PCW No. 4 of 4	1)				
Case ID No.	60882						
Reg. Ent. Reference No.	RN100238708						
Media						Percent Interest	Years of
Violation No.	23						Depreciation
						5.0	15
	Item Cost	Date Required	Final Date	Yrs	Interest Saved	Costs Saved	EB Amount
Item Description							
Delayed Costs				a l			
Equipment				0.00	\$0	\$0	\$0
Buildings				0.00	\$0	\$0	\$0
Other (as needed)				0.00	\$0	\$0 \$0	\$0
Engineering/Construction Land				0.00	\$0 \$0	n/a	\$0 \$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-2018	23-Jun-2022	3.78	\$1,892	n/a	\$1,892
Notes for DELAYED costs	for all trip scel if activated, up and create gu of emissions	Estimated cost to evaluate Abnormal Situtation Management ("ASM") Control Language ("CL") programs for all trip scenarios on similar Kinetics Technology International ("KTI") furnaces to confirm proper actions if activated, update DCS control narratives, create a cause and effect matrix for KTI furnace trip scenarios, and create guidance for testing CL programs to ensure proper function in order to prevent the recurrence of emissions events due to the same or similar causes as Incident No. 291947. The Date Required is the date the emissions event occurred and the Final Date is the date of compliance.					
Avoided Costs	ANNU	ALIZE avoided c	osts before er	tering	item (except for	one-time avoided	l 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		\$1,892

	E	conomic	Benefit '	Woi	ksheet		
Respondent	INEOS USA LL	C (PCW No. 4 of 4	1)				
Case ID No.	60882						
Reg. Ent. Reference No.	RN100238708						
Media	Air					Percent Interest	Years of
Violation No.	24					r creent interest	Depreciation
						5.0	15
	Item Cost	Date Required	Final Date	Yrs	Interest Saved	Costs Saved	EB Amount
Item Description							
Delayed Costs				_			
Equipment				0.00	\$0	\$0	\$0
Buildings				0.00	\$0	\$0	\$0
Other (as needed)				0.00	\$0	\$0	\$0
Engineering/Construction				0.00	\$0	\$0	\$0
Land				0.00	\$0	n/a	\$0
Record Keeping System				0.00	\$0	n/a	\$0
Training/Sampling				0.00	\$0 \$0	n/a	\$0 \$0
Remediation/Disposal Permit Costs						n/a	\$0
Other (as needed)	\$10,000	4-Apr-2020	20-Dec-2021	0.00 1.71	\$0 \$856	n/a n/a	\$856
Notes for DELAYED costs	develop a m mapping in	napping procedure order to prevent	to provide oper the recurrence of e Required is the	rations of of emiss e date t	with a guideline for sions events due to	talytic reduction cat r preparation of the o the same or simila t began and the Fin	turbines for r causes as
Avoided Costs	ANNU	ALIZE avoided c	osts before en	tering	item (except for	one-time avoided	l 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) Notes for AVOIDED costs				0.00	\$0	\$0	\$0
Approx. Cost of Compliance		\$10,000			TOTAL		\$856

Sci	reening Date				et No. 2021-0818-AIR-E	PCW
	Respondent		C (PCW No. 4 o	of 4)	Po	icy Revision 5 (January 28, 2021)
	Case ID No.					PCW Revision February 11, 2021
Reg. Ent. R	eference No.					
	Media					
	Coordinator		1			
Vic	olation Number	25				
	Rule Cite(s)	30 Tex. Admin	. Code §§ 101	1.20(3), 116.115	(c), and 122.143(4), NSR Permit No	s.
					2327, GTC and STC No. 26, and Tex	
			Hea	Ith & Safety Code	e § 382.085(b)	
					Specifically, the Respondent released	
\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\	·				eleased 8,433.31 lbs of CO, 1,667.2	
Violat	ion Description		•		e No. 2 Olefins Flare, EPN DDM-310 4479) that began on August 9, 2021	·
		during an em		lasted 26 hours a		
					Base Pena	lty \$25,000
						Ψ23,000
>> Environm	ental, Prope	rty and Hum		Matrix		
	Palanca	Maiar	Harm Moderate	Mino-		
OR	Release Actual	Major	Moderate	Minor		
OK .	Potential		X		Percent 50.0%	
	i occirciai				30.070	
>>Programm	natic Matrix					
	Falsification	Major	Moderate	Minor		
					Percent 0.0%	
Matrix					nificant amounts of pollutants that d	
Notes	not exceed i	eveis that are p		iman neaith or e the violation.	nvironmental receptors as a result o	T
				the violation.		
					Adjustment \$12,	500
					,	
						\$12,500
Violation Eve	nte					
Violation Lve	iits					
	Number of \	Violation Events	1		Number of violation days	
				- <u></u>		
		daily				
		weekly	X			
		monthly quarterly			Violation Base Pena	lty \$12,500
		semiannual			Violation base Pena	\$12,300
		annual				
		single event				
				<u>-</u>		
			One weekly	event is recomm	nended.	
Good Faith Ef	fforts to Com	ply	10.0%		Reduct	ion \$1,250
		В	Before NOE/NOV	NOE/NOV to EDPRE		
		Extraordinary				
		Ordinary		Х		
		N/A				
			The Respon	dent complete th	ne corrective measures by	
		Notes	·	•	dated November 19, 2021.	
					Violation Subto	tal \$11,250
	e. (==) c					
Economic Be	nefit (EB) for	this violation	on		Statutory Limit Test	
	Estimat	ed EB Amount		\$448	Violation Final Penalty To	tal \$22,325
	Estimat	ed EB Amount		•	·	
	Estimat	ed EB Amount		•	Violation Final Penalty To sessed Penalty (adjusted for limi	

	E	conomic	Benefit	Wor	ksheet		
Respondent	INEOS USA LL	C (PCW No. 4 of 4	1)				
Case ID No.	60882						
Reg. Ent. Reference No.	RN100238708						
Media	Air					B	Years of
Violation No.	25					Percent Interest	Depreciation
						5.0	15
	Item Cost	Date Required	Final Date	Yrs	Interest Saved	Costs Saved	EB Amount
Item Description							
Delayed Costs				_			
Equipment				0.00	\$0	\$0	\$0
Buildings				0.00	\$0	\$0	\$0
Other (as needed)				0.00	\$0	\$0	\$0
Engineering/Construction				0.00	\$0	\$0	\$0
Land				0.00	\$0	n/a	\$0
Record Keeping System				0.00	\$0	n/a	\$0
Training/Sampling				0.00	\$0 #0	n/a	\$0 #0
Remediation/Disposal Permit Costs				0.00	\$0 \$0	n/a n/a	\$0 \$0
Other (as needed)	\$10,000	9-Aug-2021	2-Jul-2022	0.00	\$448	n/a	\$448
other (as necaca)							
						e equipment is down	
						8 to include steps re	
Notes for DELAYED costs				,		vent the recurrence	
	events due					e Date Required is the	ne date the
		emissions e	vent began and	the Fina	al Date is the date	of compliance.	
Avoided Costs	ANNU	ALIZE avoided c	osts before er	tering	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		\$448

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 CN602817884, RN100238708, Rating Year 2023 which includes Compliance History (CH) components from September 1, 2018, through August 31, 2023.

Customer, Respondent, CN602817884, INEOS USA LLC Classification: SATISFACTORY **Rating:** 10.38

or Owner/Operator:

Classification: SATISFACTORY **Rating: 11.86** Regulated Entity: RN100238708, CHOCOLATE BAYOU

PLANT

Complexity Points: Repeat Violator: NO

CH Group: 05 - Chemical Manufacturing

Location: 15926 Farm-to-Market Road 2004, Alvin, Brazoria County, Texas

TCEQ Region: REGION 12 - HOUSTON

ID Number(s):

AIR OPERATING PERMITS ACCOUNT NUMBER BL0002S AIR OPERATING PERMITS PERMIT 1353

AIR OPERATING PERMITS PERMIT 2327

PUBLIC WATER SYSTEM/SUPPLY REGISTRATION 0200132

AIR NEW SOURCE PERMITS PERMIT 101

AIR NEW SOURCE PERMITS REGISTRATION 12953 **AIR NEW SOURCE PERMITS REGISTRATION 10465 AIR NEW SOURCE PERMITS REGISTRATION 11060**

AIR NEW SOURCE PERMITS REGISTRATION 12136 AIR NEW SOURCE PERMITS ACCOUNT NUMBER

BL0002S

AIR NEW SOURCE PERMITS EPA PERMIT PSDTX854

AIR NEW SOURCE PERMITS PERMIT 491A AIR NEW SOURCE PERMITS PERMIT 4882

AIR NEW SOURCE PERMITS PERMIT 19868 AIR NEW SOURCE PERMITS REGISTRATION 48637

AIR NEW SOURCE PERMITS REGISTRATION 74968

AIR NEW SOURCE PERMITS EPA PERMIT PSDTX793

AIR NEW SOURCE PERMITS EPA PERMIT PSDTX642 **AIR NEW SOURCE PERMITS** EPA PERMIT PSDTX854M2

AIR NEW SOURCE PERMITS REGISTRATION 94567

AIR NEW SOURCE PERMITS REGISTRATION 119368

AIR NEW SOURCE PERMITS EPA PERMIT PSDTX642M2

AIR NEW SOURCE PERMITS REGISTRATION 139465 AIR NEW SOURCE PERMITS REGISTRATION 118784

AIR NEW SOURCE PERMITS REGISTRATION 164204

AIR NEW SOURCE PERMITS REGISTRATION 169828

AIR NEW SOURCE PERMITS REGISTRATION 164642

AIR NEW SOURCE PERMITS REGISTRATION 164404

AIR NEW SOURCE PERMITS PERMIT 123117

AIR NEW SOURCE PERMITS REGISTRATION 146149

AIR NEW SOURCE PERMITS REGISTRATION 157335

AIR NEW SOURCE PERMITS REGISTRATION 156143

AIR NEW SOURCE PERMITS REGISTRATION 157279

AIR NEW SOURCE PERMITS REGISTRATION 175913

PETROLEUM STORAGE TANK REGISTRATION

REGISTRATION 12999

UNDERGROUND INJECTION CONTROL PERMIT

5D0400007

WASTEWATER PERMIT WQ0001333000

AIR EMISSIONS INVENTORY ACCOUNT NUMBER

BL0002S

AIR OPERATING PERMITS PERMIT 3966 AIR NEW SOURCE PERMITS PERMIT 95

AIR NEW SOURCE PERMITS REGISTRATION 75608 AIR NEW SOURCE PERMITS REGISTRATION 75399 AIR NEW SOURCE PERMITS REGISTRATION 10906 AIR NEW SOURCE PERMITS REGISTRATION 11539 AIR NEW SOURCE PERMITS REGISTRATION 12709 AIR NEW SOURCE PERMITS AFS NUM 4803900014

AIR NEW SOURCE PERMITS PERMIT 488A AIR NEW SOURCE PERMITS REGISTRATION 1041 AIR NEW SOURCE PERMITS PERMIT 7196 AIR NEW SOURCE PERMITS PERMIT 35735

AIR NEW SOURCE PERMITS REGISTRATION 71820 AIR NEW SOURCE PERMITS REGISTRATION 76394 AIR NEW SOURCE PERMITS EPA PERMIT PSDTX983 **AIR NEW SOURCE PERMITS REGISTRATION 78483 AIR NEW SOURCE PERMITS REGISTRATION 87813**

AIR NEW SOURCE PERMITS PERMIT 97769

AIR NEW SOURCE PERMITS REGISTRATION 131449 AIR NEW SOURCE PERMITS REGISTRATION 109242 AIR NEW SOURCE PERMITS EPA PERMIT GHGPSDTX135 **AIR NEW SOURCE PERMITS EPA PERMIT PSDTX1460**

AIR NEW SOURCE PERMITS PERMIT AMOC195

AIR NEW SOURCE PERMITS REGISTRATION 168626

AIR NEW SOURCE PERMITS REGISTRATION 166365

AIR NEW SOURCE PERMITS REGISTRATION 149467

AIR NEW SOURCE PERMITS REGISTRATION 151128

AIR NEW SOURCE PERMITS REGISTRATION 155199

AIR NEW SOURCE PERMITS REGISTRATION 155412

AIR NEW SOURCE PERMITS REGISTRATION 160686

AIR NEW SOURCE PERMITS REGISTRATION 172362 AIR NEW SOURCE PERMITS REGISTRATION 174098

IHW CORRECTIVE ACTION SOLID WASTE

REGISTRATION # (SWR) 30042

STORMWATER PERMIT TXR05DG63 WASTEWATER EPA ID TX0004821

POLLUTION PREVENTION PLANNING ID NUMBER

P00028

INDUSTRIAL AND HAZARDOUS WASTE EPA ID INDUSTRIAL AND HAZARDOUS WASTE SOLID WASTE TXD050309012 REGISTRATION # (SWR) 30042

INDUSTRIAL AND HAZARDOUS WASTE PERMIT 50121

TAX RELIEF ID NUMBER 21034 TAX RELIEF ID NUMBER 23641 TAX RELIEF ID NUMBER 23910 TAX RELIEF ID NUMBER 21037 TAX RELIEF ID NUMBER 21032

Compliance History Period: September 01, 2018 to August 31, 2023 Rating Year: 2023 **Rating Date:** 09/01/2023

Date Compliance History Report Prepared: May 23, 2024

Agency Decision Requiring Compliance History: Enforcement

Component Period Selected: May 23, 2019 to May 23, 2024

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

Name: Danielle Porras **Phone:** (512) 239-2923

Site and Owner/Operator History:

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

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:

Effective Date: 10/21/2019 ADMINORDER 2017-1540-AIR-E (1660 Order-Agreed Order With Denial)

Classification: Moderate

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

30 TAC Chapter 122, SubChapter B 122.143(4)

5C THSC Chapter 382 382.085(b)

Ramt Prov: STC 1A OP

Description: Failed to install totalizing fuel flow meters with an accuracy of ± 5% on all applicable combustion engines to individually and continuously measure the gas and liquid fuel usage in order to demonstrate continuous compliance with control requirements for NOx in the Houston-Galveston-Brazoria nonattainment area,

Classification: Moderate

Citation: 30 TAC Chapter 101, SubChapter A 101.20(3)

30 TAC Chapter 116, SubChapter G 116,715(a)

30 TAC Chapter 122, SubChapter B 122.143(4)

5C THSC Chapter 382 382.085(b)

Rgmt Prov: SC 37A PA

STC 19 OP

Description: Failed to conduct fugitive monitoring on 11,782 flanges and connectors in VOC service in accordance

with monitoring requirements. Classification: Moderate

Citation: 30 TAC Chapter 101, SubChapter A 101.20(3)

30 TAC Chapter 116, SubChapter G 116.715(a) 30 TAC Chapter 122, SubChapter B 122.143(4)

5C THSC Chapter 382 382.085(b)

Rgmt Prov: SC 1 PA

STC 19 PA

Description: Failed to maintain the emissions limit within the maximum allowable emission rate table ("MAERT"), as documented during an investigation conducted on August 1, 2008. Specifically, the Respondent exceeded the Other Source Routine NOx Emissions Cap of 86.91 tons with emissions from October 2006 through September 2007 averaging 170.04 tons.

Classification: Moderate

30 TAC Chapter 101, SubChapter A 101.20(3)

30 TAC Chapter 116, SubChapter G 116.715(a)

30 TAC Chapter 122, SubChapter B 122.143(4)

5C THSC Chapter 382 382.085(b)

Rgmt Prov: Special Condition No. 1 PERMIT

Special Terms and Conditions No. 18 OP

Description: Failed to maintain the emissions limit within the MAERT, as documented during an investigation conducted on August 1, 2008. Specifically, the Maintenance, Start-up, and Shutdown ("MSS") ethylene emissions for the Olefins #1 and #2 Flares exceeded the rolling limit of 78.75 tpy from January 2007 through February 2007

Classification: Moderate

Citation: 30 TAC Chapter 101, SubChapter A 101.20(3)

30 TAC Chapter 116, SubChapter G 116.715(a) 30 TAC Chapter 122, SubChapter B 122.143(4)

5C THSC Chapter 382 382.085(b)

Rgmt Prov: Special Condition No. 1 PERMIT

Special Condition No. 18 OP

Description: Failed to maintain the emissions limit within the MAERT, as documented during an investigation conducted on August 1, 2008. Specifically, the MSS VOC emissions for the Olefins #1 and #2 Flares exceeded the rolling limit of 87.50 tpy from January 2007 through March 2007

Classification: Moderate

Citation: 30 TAC Chapter 101, SubChapter A 101.20(3)

30 TAC Chapter 116, SubChapter B 116.115(c)

30 TAC Chapter 122, SubChapter B 122.143(4)

5C THSC Chapter 382 382.085(b)

Rgmt Prov: FOP Special Term & Condition 20 OP

NSR Special Condition 43H PERMIT

Description: Failure to operate predictive emissions monitoring systems (PEMS) at least 95 percent of the time for

four furnaces (EPNs: DB-104, DDB-101C; DDB-104A, & DDB-104B). [Category C4]

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)

Rgmt Prov: Special Condition 2 PERMIT

Special Terms and Conditions (ST&C) 20 OP

Description: Failure to comply with maximum allowable emission rate (MAER) for CO. (Category A8GC2)

2 Effective Date: 06/19/2023 ADMINORDER 2021-0473-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: FOP 2327, GTC OP

FOP 2327, STC No. 26 OP

NSR Permit No. 95, Special Condition 2 PERMIT

Description: Failure to prevent unauthorized emissions. The Respondent released 60,436.66 pounds ("lbs") of volatile organic compounds ("VOC"), 79,128.27 lbs of carbon monoxide ("CO"), and 15,554.09 lbs of nitrogen oxides ("NOx") from the No. 2 Olefins Flare, Emissions Point Number ("EPN") DDM-3101, during an emissions event (Incident No. 342047) that began on September 11, 2020 and lasted 57 hours. The emission event occurred due to a collapsed strainer on Ethylene Compressor C501, resulting in flaring.

Classification: Minor

Citation: 30 TAC Chapter 101, SubChapter F 101.211(b)(1)

30 TAC Chapter 122, SubChapter B 122.143(4)

5C THSC Chapter 382 382.085(b)

Rgmt Prov: FOP 2327, GTC and STC No. 2.G OP

Description: Failed identify the required information on the final record for a scheduled maintenance, startup, or shutdown activity. The Respondent did not include the reason for the maintenance activity on the final record for Incident No. 342047.

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: FOP 2327, GTC OP

FOP 2327, STC No. 26 OP

NSR, Special Condition 2 PERMIT

Description: Failure to prevent unauthorized emissions. The Respondent released 30,131.42 lbs of VOC, 28,921.39 lbs of CO, and 5,682.88 lbs of NOx from the No. 2 Olefins Flare, EPN DDM-3101, during an emissions event (Incident No. 346644) that began on November 25, 2020 and lasted 16 hours. The emissions event occurred when the level transmitter on the level controller on the drum did not read the level correctly that caused the incorrect level reading to not alarm on high level, resulting in the compressor

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: FOP 2327, GTC OP

FOP 2327, STC No. 26 OP

NSR Permit, Special Condition 2 PERMIT

Description: Failed to prevent unauthorized emissions. The Respondent released 12,107.34 lbs of VOC, 19,765.92 lbs of CO, and 3,891.90 lbs of NOx from the No. 1 Olefins Flare, EPN DM-1101, during an emissions event (Incident No. 346735) that began on November 30, 2020 and lasted 29 hours. The emissions event occurred due to a fuel gas compressor trip that caused the unexpected loss of two steam Cogeneration Units, resulting in flaring.

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: FOP 2327, GTC OP

FOP 2327, STC No. 26 OP Special Condition 2 PERMIT

Description: Failed to prevent unauthorized emissions. The Respondent released 23,021.62 lbs of VOC, 32,042.74 lbs of CO, and 6,304.72 lbs of NOx from the No. 1 Olefins Flare, EPN DM-1101, during an emissions event (Incident No. 326641) that began on December 15, 2019 and lasted 35 hours. The emissions event occurred due to a temporary loss of power that caused the control valves to switch to their fail position and the Acetylene Reactor to trip, resulting in flaring.

3 Effective Date: 08/07/2023 ADMINORDER 2023-0064-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: FOP 2327, GTC OP

FOP 2327, STC No. 26 OP NSR 95, SC No. 2 PERMIT

Description: Failed to prevent unauthorized emissions. Specifically, the Respondent released 233.52 pounds of nitrogen oxides from Cogen, Emissions Point Number A-100, during an emissions event (Incident No. 321895) that began on September 29, 2019 and lasted nine hours. The emissions event occurred due to the misfiring of spark plugs and debris from the atmosphere or air inlet system being sucked into the air inlet and passing through the turbine compressor which caused the debris to be superheated after p

B. Criminal convictions:

N/A

C. Chronic excessive emissions events:

1uly 08 2010

N/A

Itom 1

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

(1503113)

item i	July 08, 2019	(1593113)
Item 2	August 02, 2019	(1552294)
Item 3	September 11, 2019	(1606364)
Item 4	October 08, 2019	(1613210)
Item 5	December 02, 2019	(1612000)
Item 6	December 11, 2019	(1626376)
Item 7	January 13, 2020	(1634017)
Item 8	February 10, 2020	(1640636)
Item 9	April 09, 2020	(1653492)
Item 10	April 28, 2020	(1640257)
Item 11	May 04, 2020	(1597713)
Item 12	May 12, 2020	(1646363)
Item 13	May 18, 2020	(1660078)
Item 14	June 09, 2020	(1666583)
Item 15	July 14, 2020	(1640012)
Item 16	July 31, 2020	(1651359)
Item 17	August 07, 2020	(1680315)
Item 18	August 25, 2020	(1624754)
Item 19	October 12, 2020	(1693230)

Item 20	November 13, 2020	(1686496)
Item 21	November 30, 2020	(1692122)
Item 22	December 10, 2020	(1757144)
Item 23	January 08, 2021	(1686259)
Item 24	January 12, 2021	(1712385)
Item 25	February 05, 2021	(1725438)
Item 26	February 25, 2021	(1696929)
Item 27	March 11, 2021	(1699415)
	·	
Item 28	March 12, 2021	(1725439)
Item 29	April 13, 2021	(1725440)
Item 30	May 14, 2021	(1740030)
Item 31	May 28, 2021	(1711364)
Item 32	June 10, 2021	(1723572)
Item 33	June 11, 2021	(1740031)
Item 34	July 01, 2021	(1735657)
Item 35	July 19, 2021	(1751680)
Item 36	August 02, 2021	(1747394)
Item 37	August 20, 2021	(1745863)
Item 38	August 30, 2021	(1685590)
	5 ,	
Item 39	September 01, 2021	(1702300)
Item 40	September 14, 2021	(1690450)
Item 41	September 17, 2021	(1766224)
Item 42	September 23, 2021	(1684041)
Item 43	September 27, 2021	(1692237)
Item 44	October 12, 2021	(1776627)
Item 45	October 31, 2021	(1763655)
Item 46	November 11, 2021	(1783596)
Item 47	December 07, 2021	(1848397)
Item 48	December 10, 2021	(1790620)
Item 49	December 14, 2021	
	•	(1771237)
Item 50	December 15, 2021	(1781391)
Item 51	January 20, 2022	(1798415)
Item 52	February 16, 2022	(1806290)
Item 53	March 17, 2022	(1813355)
Item 54	May 11, 2022	(1828767)
Item 55	June 20, 2022	(1835057)
Item 56	June 23, 2022	(1707999)
Item 57	July 12, 2022	(1842263)
Item 58	August 07, 2022	(1834230)
Item 59	August 22, 2022	(1772434)
Item 60	September 12, 2022	(1856193)
	'	
Item 61	October 18, 2022	(1862551)
Item 62	November 10, 2022	(1869466)
Item 63	December 12, 2022	(1882135)
Item 64	December 19, 2022	(1875313)
Item 65	December 23, 2022	(1861709)
Item 66	February 08, 2023	(1889952)
Item 67	February 22, 2023	(1874667)
Item 68	March 08, 2023	(1893861)
Item 69	March 21, 2023	(1874824)
Item 70	April 10, 2023	(1905298)
Item 71	May 10, 2023	(1855535)
Item 72	June 13, 2023	(1919083)
Item 73	July 11, 2023	(1919003)
		,
Item 74	July 12, 2023	(1845934)
Item 75	July 21, 2023	(1912330)
Item 76	July 27, 2023	(1917276)
Item 77	August 10, 2023	(1933013)
Item 78	September 13, 2023	(1939147)
Item 79	October 10, 2023	(1945999)
Item 80	October 18, 2023	(1971789)
	•	

Item 81	October 25, 2023	(1931876)
Item 82	October 30, 2023	(1924210)
Item 83	December 12, 2023	(1961453)
Item 84	February 15, 2024	(1961240)
Item 85	February 19, 2024	(1977112)
Item 86	March 25, 2024	(1942881)

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

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

1 Date: 06/01/2023 (1881184)

Self Report? YES Classification: Minor

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

30 TAC Chapter 122, SubChapter B 122.145(2)(A)

3966 OP

5C THSC Chapter 382 382.085(b)

Description: Failure to report all instances of deviations in the October 1, 2021 through

March 30, 2022 semi-annual deviation report. (Category B3)

Self Report? YES Classification: Mino

Citation: 123117 PERMIT

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

3966 OP

5C THSC Chapter 382 382.085(b)

Description: Failure to conduct daily audible, visible, olfactory (AVO) inspections for

emission point number (EPN) Fugitives

(Category B1)

Self Report? YES Classification: Moderate

Citation: 123117 PERMIT

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

3966 OP

5C THSC Chapter 382 382.085(b)

Description: Failure to conduct quarterly cylinder gas audits (CGA) at least two months

apart at EPN BLR1 (Category C4)

Self Report? YES Classification: Minor

Citation: 123117 PERMIT

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

3966 OP

5C THSC Chapter 382 382.085(b)

Description: Failure to comply with maximum allowable emission rate (MAER) for NH3,

NOx, and CO at EPN TURB1 (Category B13)

2 Date: 08/18/2023 (1881183)

Self Report? YES Classification: Moderate

Citation: 2327 OP

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)

Description: Failure to prevent visible emissions from boiler unit DB901A; EPN DB-901A

(Category B13 violation)

Self Report? YES Classification: Moderate

Citation: 2327 OP

2327 PERMIT

30 TAC Chapter 116, SubChapter B 116.115(c) 30 TAC Chapter 117, SubChapter B 117.310(c)(2) 30 TAC Chapter 122, SubChapter B 122.143(4)

5C THSC Chapter 382 382.085(b)

95 PERMIT

Description: Failure to comply with CO emissions rates (MAER); NH3 and NOx

concentration limits, for furnace unit DB108; EPN DB-108 (Category B13

violation).

Self Report? YES Classification: Moderate

Citation: 2327 OP

30 TAC Chapter 115, SubChapter H 115.725(d)(4) 30 TAC Chapter 122, SubChapter B 122.143(4)

5C THSC Chapter 382 382.085(b)

Description: Failure to perform manual flare header gas sampling at unit P-2OLEF; EPN

DDM-3101 (Category B1).

Self Report? YES Classification: Moderate

Citation: 2327 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)

95 PERMIT

Description: Failure to conduct weekly audible, visible, olfactory (AVO) inspections for

Olefins 1 Unit (Category B1).

Self Report? YES Classification: Moderate

Citation: 2327 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)

95 PERMIT

Description: Failure to conduct weekly audible, visible, olfactory (AVO) inspections for

Olefins 2 Unit (Category B1).

Self Report? YES Classification: Moderate

Citation: 2327 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)

95 PERMIT

Description: Failure to document volume of vacuum truck material during MSS activity

(Category B3).

Self Report? YES Classification: Moderate

Citation: 2327 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)

95 PERMIT

Description: Failure to document carbon breakthrough during MSS activities (Category

B3).

Self Report? YES Classification: Moderate

Citation: 2327 OP

30 TAC Chapter 116, SubChapter B 116.115(c) 30 TAC Chapter 117, SubChapter B 117.310(c)(2) 30 TAC Chapter 122, SubChapter B 122.143(4)

5C THSC Chapter 382 382.085(b)

95 PERMIT

Description: Failure to comply with CO maximum allowable emissions rates (MAER); and

NH3 concentration limits for furnace unit DB-105; EPN DB-105 (Category B13

violation)

Self Report? YES Classification: Moderate

Citation: 2327 OP

30 TAC Chapter 115, SubChapter D 115.352(4) 30 TAC Chapter 115, SubChapter H 115.783(5) 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) 40 CFR Chapter 63, SubChapter C, PT 63, SubPT UU 63.1033(b)(1)

5C THSC Chapter 382 382.085(b)

95 PERMIT

Description: Failure to prevent open ended lines; EPN Fugitives (Category C10).
Self Report? YES Classification: Moderate

Citation: 2327 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)

95 PERMIT

Description: Failure to comply with VOC maximum allowable emissions rate (MAER) for

unit DCWT; EPN AT-1210 (Category B13).

Self Report? YES Classification: Moderate

Citation: 2327 OP

30 TAC Chapter 111, SubChapter A 111.111(a)(4)(A) 30 TAC Chapter 116, SubChapter B 116.115(c) 30 TAC Chapter 122, SubChapter B 122.143(4)

40 CFR Chapter 60, SubChapter C, PT 60, SubPT A 60.18(c)(1) 40 CFR Chapter 63, SubChapter C, PT 63, SubPT A 63.11(b)(4)

5C THSC Chapter 382 382.085(b)

95 PERMIT

Description: Failure to prevent visible emissions from flare unit P-10LEF; EPN DM-1101

(Category B13)

Self Report? YES Classification: Minor

Citation: 2327 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)

95 PERMIT

Description: Failure to record functionality testing results for LEL monitors during MSS

activity (Category B3).

Self Report? YES Classification: Minor

Citation: 2327 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)

95 PERMIT

Description: Failure to maintain LEL calibration test data during MSS activities (Category

B3).

Self Report? YES Classification: Moderate

Citation: 2327 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)

97769 PERMIT

Description: Failure to comply with total annual hours devoted to operations in hot standby

mode at furnace unit HB105; EPN DDB-105 (Category B17).

Self Report? YES Classification: Moderate

Citation: 2327 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)

97769 PERMIT

Description: Failure to comply with total annual hours devoted to decoking a cracking

furnace at HB105; EPN DDB-105 (Category B13).

Self Report? YES Classification: Moderate

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

40 CFR Chapter 63, SubChapter C, PT 63, SubPT ZZZZ 63.6625

5C THSC Chapter 382 382.085(b)

Description: Failure to install continuous parameter monitoring system (CPMS) on Engine

DCPCOMP1 (Category B15 violation).

Self Report? YES Classification: Moderate

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

40 CFR Chapter 63, SubChapter C, PT 63, SubPT ZZZZ 63.6625

5C THSC Chapter 382 382.085(b)

Description: Failure to install continuous parameter monitoring system (CPMS) on Engine

DCPCOMP2 (Category B15 violation)

Self Report? YES Classification: Moderate

Citation: 2327 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)

95 PERMIT

Description: Failure to comply with maximum allowable emission rates (MAER) for CO at

EPN DDB-102D (Category B13 violation)

Self Report? YES Classification: Moderate

Citation: 2327 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)

95 PERMIT

Description: Failure to comply with maximum allowable emission rates (MAER) for CO at

EPN DDB-102A (Category B13 violation)

Self Report? YES Classification: Moderate

Citation: 2327 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)

95 PERMIT

Description: Failure to comply with maximum allowable emission rates (MAER) for CO at

EPN DDB-102B (Category B13 violation)

Self Report? YES Classification: Moderate

Citation: 2327 OP

30 TAC Chapter 117, SubChapter B 117.310(c)(2) 30 TAC Chapter 122, SubChapter B 122.143(4)

5C THSC Chapter 382 382.085(b)

Description: Failure to comply with NH3 one-hour concentration limit for Furnace DB-109;

EPN DB-109 (Category B13 violation)

Self Report? YES Classification: Moderate

Citation: 2327 OP

30 TAC Chapter 111, SubChapter A 111.111(a)(4)(A) 30 TAC Chapter 116, SubChapter B 116.115(c) 30 TAC Chapter 122, SubChapter B 122.143(4)

40 CFR Chapter 60, SubChapter C, PT 60, SubPT A 60.18(c)(1) 40 CFR Chapter 63, SubChapter C, PT 63, SubPT A 63.11(b)(4)

5C THSC Chapter 382 382.085(b)

95 PERMIT

Description: Failure to prevent visible emissions from flare unit P-2OLEF; EPN DDM-3101

(Category B13)

Self Report? YES Classification: Minor

Citation: 2327 OP

30 TAC Chapter 117, SubChapter B 117.310(f) 30 TAC Chapter 122, SubChapter B 122.143(4)

5C THSC Chapter 382 382.085(b)

Description: Failure to comply with engine operating restrictions at unit AN-101; EPN

CBMISCENG (Category C4 violation)

Self Report? YES Classification: Moderate

Citation: 2327 OP

30 TAC Chapter 115, SubChapter B 115.112(e)(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)

95 PERMIT

Description: Failure to maintain minimum seal gap requirement for tank T3901PYGAS; EPN

AF-3901 (Category B13 violation)

Self Report? YES Classification: Moderate

Citation: 2327 OP

30 TAC Chapter 122, SubChapter B 122.143(4)

40 CFR Chapter 63, SubChapter C, PT 63, SubPT G 63.138(b)(1)(i)

5C THSC Chapter 382 382.085(b)

Description: Failure to maintain a concentration of total Hazardous Air Pollutants (HAPS) in

wastewater (Category B13 violation)

Self Report? YES Classification: Moderate

Citation: 2327 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)

95 PERMIT

Description: Failure to record pilot flame for flare unit OSDOCKFLR; EPN AM-1500

(Category B1 violation)

Self Report? YES Classification: Moderate

Citation: 30 TAC Chapter 116, SubChapter B 116.116(a)(1)

5C THSC Chapter 382 382.085(b)

Description: Failure to maintain maximum firing rate for unit HB104A; EPN DDB-104A

(Category B17 violation)

Self Report? YES Classification: Moderate Citation: 40 CFR Chapter 63, SubChapter C, PT 63, SubPT ZZZZ 63.6610(a)

5C THSC Chapter 382 382.085(b)

Description: Failure to conduct the initial performance test (formaldehyde testing) on

stationary diesel fuel engine DCPCOMP1. (Category B1 violation)

Self Report? YES Classification: Moderate Citation: 40 CFR Chapter 63, SubChapter C, PT 63, SubPT ZZZZ 63.6610(a)

5C THSC Chapter 382 382.085(b)

Description: Failure to conduct the initial performance test (formaldehyde testing) on for

diesel fuel engine DCPCOMP2. (Category B1 violation)

Self Report? YES Classification: Moderate

Citation: 30 TAC Chapter 122, SubChapter B 122.142(b)(2)

5C THSC Chapter 382 382.085(b)

Description: Failure to properly represent DCPCOMP1 emissions unit within a Federal

Operating Permit (Category B3)

Self Report? YES Classification: Moderate

Citation: 30 TAC Chapter 122, SubChapter B 122.142(b)(2)

5C THSC Chapter 382 382.085(b)

Description: Failure to properly represent DCPCOMP2 emissions unit within a Federal

Operating Permit (Category B3)

Self Report? YES Classification: Moderate

Citation: 30 TAC Chapter 117, SubChapter B 117.335(a)(2)

5C THSC Chapter 382 382.085(b)

Description: Failure to test engine DCPCOMP1 for NH3 emissions (Category B1 violation)
Self Report? YES Classification: Moderate

Citation: 30 TAC Chapter 117, SubChapter B 117.335(a)(2)

5C THSC Chapter 382 382.085(b)

Description: Failure to test engine DCPCOMP2 for NH3 emissions (Category B1 violation)
Self Report? YES Classification: Moderate

Citation: 30 TAC Chapter 117, SubChapter B 117.340(c)(1)(D)

5C THSC Chapter 382 382.085(b)

Description: Failure to install continuous or predictive monitoring system (CEMS/PEMS) on

Engine DCPCOMP1 (Category B15 violation)

Self Report? YES Classification: Moderate

Citation: 30 TAC Chapter 117, SubChapter B 117.340(c)(1)(D)

5C THSC Chapter 382 382.085(b)

Description: Failure to install continuous or predictive monitoring system (CEMS/PEMS) on

Engine DCPCOMP2 (Category B15 violation)

Self Report? YES Classification: Moderate

Citation: 2327 OP

30 TAC Chapter 106, SubChapter A 106.8(c)(2) 30 TAC Chapter 116, SubChapter B 116.115(c) 30 TAC Chapter 122, SubChapter B 122.143(4) 40 CFR Part 61, Subpart FF 61.356(f)(2)(i)(D) 5C THSC Chapter 382 382.085(b)

of DEDMIT

95 PERMIT

Description: Failure to maintain documentation for temporary flare (Category B3 violation)

Self Report? YES Classification: Minor

Citation: 2327 OP

30 TAC Chapter 116, SubChapter B 116.115(c) 30 TAC Chapter 117, SubChapter B 117.310(c)(2) 30 TAC Chapter 122, SubChapter B 122.143(4)

5C THSC Chapter 382 382.085(b)

95 PERMIT

Description: Failure to comply with CO pounds per hour emissions rates, and NH3 and NOx

concentration limits for furnace unit DB-106 (EPN DB-106) (Category B13

violation)

Self Report? YES Classification: Moderate

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

5C THSC Chapter 382 382.085(b)

Description: Failure to comply with continuing demonstration of compliance for ammonia

emissions for engine DCPCOMP1 (Category B1 violation)

Self Report? YES Classification: Moderate

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

5C THSC Chapter 382 382.085(b)

Description: Failure to comply with continuing demonstration of compliance for ammonia

emissions for engine DCPCOMP2 (Category B1 violation)

Self Report? YES Classification: Moderate

Citation: 2327 OP

30 TAC Chapter 122, SubChapter B 122.143(4)

5C THSC Chapter 382 382.085(b)

Description: Failure to maintain minimum inlet gas flow rate (steam flow) at EPN

GRP-VENT6 (Category B13 violation)

3 Date: 10/31/2023 (1951691)

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

4 Date: 12/31/2023 (1968049)

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: 02/29/2024 (1983677)

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

6 Date: 05/20/2024 (1924903)

Self Report? NO Classification: Minor

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

40 CFR Chapter 60, SubChapter C, PT 60, SubPT A 60.18(c)(2)

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

Special Terms and Conditions 1A and 14 OP

Description: Failure to maintain a constant pilot flame for Flare P4 (EPN: P4-Flare)

(Category 4).

Self Report? NO Classification: Moderate

Citation: 30 TAC Chapter 111, SubChapter A 111.111(a)(4)(A) 30 TAC Chapter 116, SubChapter B 116.115(c) 30 TAC Chapter 122, SubChapter B 122.143(4)

40 CFR Chapter 60, SubChapter C, PT 60, SubPT A 60.18(c)(1)

5C THSC Chapter 382 382.085(b) Special Condition 10(C) PERMIT

Special Terms and Conditions 1A and 14 OP

Description: Failure to prevent visible emissions Flare P3 (EPN: P-3Poly) (Category B13). Self Report? NO Classification: Moderate

Citation: 30 TAC Chapter 111, SubChapter A 111.111(a)(4)(A)

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

40 CFR Chapter 60, SubChapter C, PT 60, SubPT A 60.18(c)(1)

5C THSC Chapter 382 382.085(b) Special Condition 5D PERMIT

Special Terms and Conditions 1A and 14 OP

Description: Failure to prevent visible emissions Flare (EPN: P4-Flare) (Category B13). Self Report? NO Classification: Moderate

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

30 TAC Chapter 122, SubChapter B 122.143(4)

5C THSC Chapter 382 382.085(b) Special Condition 10 PERMIT

Special Terms and Conditions 12 and 14 OP

Description: Failure to prevent exceedance of the differential pressure for TM-508 fabric

filter (EPN): P4-PELFLTR) (Category B17)

F. Environmental audits:

Notice of Intent Date: 04/23/2021 (1711955)

Disclosure Date: 09/21/2021

Viol. Minor

Classification:

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

40 CFR Chapter 61, SubChapter C, PT 61, SubPT FF 61.342(a) 40 CFR Chapter 61, SubChapter C, PT 61, SubPT FF 61.356(b)

Description: Failed to maintain an up-to-date list of aqueous wastes containing benzene.

Viol. Moderate

Classification:

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

40 CFR Chapter 61, SubChapter C, PT 61, SubPT FF 61.342(e)(1)
40 CFR Chapter 61, SubChapter C, PT 61, SubPT FF 61.345(a)(1)(ii)
40 CFR Chapter 61, SubChapter C, PT 61, SubPT FF 61.345(b)
40 CFR Chapter 61, SubChapter C, PT 61, SubPT FF 61.345(c)
40 CFR Chapter 61, SubChapter C, PT 61, SubPT FF 61.356(g)

Description: Failed to meet inspection requirements for some containing non-aqueous benzene waste.

Viol. Moderate

Classification:

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

40 CFR Chapter 61, SubChapter C, PT 61, SubPT FF 61.342(e)(1)
40 CFR Chapter 61, SubChapter C, PT 61, SubPT FF 61.345(a)(1)(i)
40 CFR Chapter 61, SubChapter C, PT 61, SubPT FF 61.345(c)

Description: Failed to meet monitoring requirements for some containing non-aqueous benzene waste.

Viol. Moderate

Classification:

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

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

Description: Failed to monitor all components associated with Individual Drain System Waste Management Units for

No Detectable Emissions.

Viol. Minor

Classification:

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)
40 CFR Chapter 61, SubChapter C, PT 61, SubPT FF 61.349(f)
40 CFR Chapter 61, SubChapter C, PT 61, SubPT FF 61.349(g)

Description: Failed to meet monitoring requirements for some components of the closed vent system routing

organic vapors to a control device.

Viol. Minor

Classification:

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

40 CFR Chapter 61, SubChapter C, PT 61, SubPT FF 61.349(c)
40 CFR Chapter 61, SubChapter C, PT 61, SubPT FF 61.356(f)(1)

Description: Failed to maintain on file design documentation for boilers used as a control device for organic vapors.

Viol. Moderate

Classification:

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

40 CFR Chapter 61, SubChapter C, PT 61, SubPT FF 61.349(c)
40 CFR Chapter 61, SubChapter C, PT 61, SubPT FF 61.354(c)(5)
40 CFR Chapter 61, SubChapter C, PT 61, SubPT FF 61.356(f)(2)

40 CFR Part 61, Subpart FF 61.356(f)(3)

Description: Failed to establish an acceptable continuous operating parameter to demonstrate that the boiler

achieves the appropriate conditions for proper operation for boilers used as a control device for

organic vapors.

G. Type of environmental management systems (EMSs):

N/A

H. Voluntary on-site compliance assessment dates:

Ν/Δ

I. Participation in a voluntary pollution reduction program:

N/A

J. Early compliance:

N/A

Sites Outside of Texas:

N/A

TEXAS COMMISSION ON ENVIRONMENTAL QUALITY



IN THE MATTER OF AN \$ BEFORE THE
ENFORCEMENT ACTION \$
CONCERNING \$ TEXAS COMMISSION ON
INEOS USA LLC \$
RN100238708 \$ ENVIRONMENTAL QUALITY

AGREED ORDER DOCKET NO. 2021-0818-AIR-E

I. JURISDICTION AND STIPULATIONS

On	, the Texas Commission on Environmental Quality ("the
Commission" or "TO	EQ") considered this agreement of the parties, resolving an enforcement
action regarding INI	OS USA LLC (the "Respondent") under the authority of Tex. Health & Safety
CODE ch. 382 and TE	X. WATER CODE ch. 7. The Executive Director of the TCEQ, through the
Enforcement Division	n, and the Respondent together stipulate that:

- 1. The Respondent owns and operates a chemical manufacturing plant located at 15926 Farm-to-Market Road 2004 in Alvin, Brazoria County, Texas (the "Plant"). The Plant consists or consisted of one or more sources as defined in Tex. Health & Safety Code § 382.003(12).
- 2. The Executive Director and the Respondent agree that the TCEQ has jurisdiction to enter this Order pursuant to Tex. Water Code §§ 7.002, 7.051, and 7.073, and that the Respondent is subject to TCEQ's jurisdiction. The TCEQ has jurisdiction in this matter pursuant to Tex. Water Code § 5.013 because it alleges violations of Tex. Health & Safety Code ch. 382 and the rules of the TCEQ.
- 3. The occurrence of any violation is in dispute and the entry of this Order shall not constitute an admission by the Respondent of any violation alleged in Section II ("Allegations"), nor of any statute or rule.
- 4. An administrative penalty in the amount of \$2,246,729 is assessed by the Commission in settlement of the violations alleged in Section II ("Allegations"). The Respondent paid \$898,693 of the penalty and \$449,344 of the penalty is deferred contingent upon the Respondent's timely and satisfactory compliance with all the terms of this Order and shall be waived only upon full compliance with all the terms and conditions of this Order. If the Respondent fails to timely and satisfactorily comply with any of the terms and conditions contained in this Order, the Executive Director may demand payment of all or part of the deferred penalty amount.

Pursuant to Tex. Water Code § 7.067, \$898,692 of the penalty shall be conditionally offset by the Respondent's timely and satisfactory completion of a Supplemental Environmental Project ("SEP") as defined in the attached SEP Agreement ("Attachment A", incorporated herein by reference). The Respondent's obligation to pay the conditionally offset portion of the penalty shall be discharged upon full compliance with all the terms

- and conditions of this Order, which includes the timely and satisfactory completion of all provisions of the SEP Agreement, as determined by the Executive Director.
- 5. The Executive Director and the Respondent agree on a settlement of the matters alleged in this enforcement action, subject to final approval in accordance with 30 Tex. ADMIN. CODE § 70.10(a). Any notice and procedures, which might otherwise be authorized or required in this action, are waived in the interest of a more timely resolution of the matter.
- 6. The Executive Director may, without further notice or hearing, refer this matter to the Office of the Attorney General of the State of Texas ("OAG") for further enforcement proceedings if the Executive Director determines that the Respondent has not complied with one or more of the terms or conditions in this Order.
- 7. This Order represents the complete and fully integrated agreement of the parties. The provisions of this Order are deemed severable and, if a court of competent jurisdiction or other appropriate authority deems any provision of this Order unenforceable, the remaining provisions shall be valid and enforceable.
- 8. This Order shall terminate five years from its effective date or upon compliance with all the terms and conditions set forth in this Order, whichever is later.
- 9. The Executive Director recognizes that the Respondent implemented the following corrective measures at the Plant:
 - a. On October 21, 2014, adjusted the feed, fuel, and oxygen levels in order to comply with the carbon monoxide ("CO") hourly maximum allowable emissions rate ("MAER") for the Steam Cracking Furnace, Emissions Point Number ("EPN") DDB-102C;
 - b. On January 14, 2015, adjusted the feed, fuel, and oxygen levels in order to comply with the CO hourly MAER for the Steam Cracking Furnace, EPN DB-107;
 - c. On January 17, 2015, adjusted the feed, fuel, and oxygen levels in order to comply with the CO hourly MAER for the Steam Cracking Furnace, EPN DB-106;
 - d. On February 9, 2015, adjusted the feed, fuel, and oxygen levels in order to comply with the CO hourly MAER for the Steam Cracking Furnace, EPN DDB-102A;
 - e. On March 18, 2015, adjusted the feed, fuel, and oxygen levels in order to comply with the nitrogen oxides ("NOx") and CO hourly MAERs for the Steam Cracking Furnace, EPN DDB-102B;
 - f. On April 9, 2015, adjusted the feed, fuel, and oxygen levels in order to comply with the volatile organic compounds ("VOC") and CO hourly MAERs for the Steam Cracking Furnace, EPN DB-105;
 - g. On May 4, 2015, adjusted the feed, fuel, and oxygen levels in order to comply with the benzene and VOC hourly MAERs for the Olefins 1 American Petroleum Institute ("API") Separator, EPN FAM1704;
 - h. On June 2, 2015, adjusted the feed, fuel, and oxygen levels in order to comply with the CO emissions limit for the No. 2 Olefins Unit Steam Boiler, EPN DDB901B;

- i. On August 20, 2015, adjusted the feed, fuel, and oxygen levels in order to comply with the CO hourly MAER for the No. 2 Olefins Unit Steam Boiler, EPN DDB901B;
- j. On November 20, 2015, implemented measures in order to comply with the CO hourly MAER for the Steam Cracking Furnace, EPN DDB-101B;
- k. On April 1, 2016, adjusted the process conditions in order to comply with the benzene outlet concentration limit for the Second Stage Hydrotreater Unit Treatment Process PRO-SSMON and Olefins 2 Aromatic Waste Minimization Project Treatment Process PRO-AWMP2;
- l. On September 9, 2016, implemented measures in order to comply with the ammonia ("NH3") concentration limit for the Steam Cracking Furnace, EPN DB-109;
- m. On September 20, 2016, implemented measures in order to comply with the NOx and CO hourly MAERs for Furnace No. 105, EPN DDB-105;
- n. By September 30, 2016, upgraded the data acquisition and data storage system for the maintenance, startup, or shutdown ("MSS") monitoring program and began maintaining the records for the calibration of the lower explosive limit ("LEL") detectors;
- o. By September 30, 2016, began maintaining the records for the functionality test for the LEL detectors;
- p. By September 30, 2016, began maintaining the records containing the information and data sufficient for the LEL readings during MSS activities in order to demonstrate compliance with New Source Review ("NSR") Permit Nos. 95 and PSDTX854M2:
- q. By November 29, 2016, maximized the hydrogen to fuel gas ratio in order to comply with the NOx and CO hourly MAERs for the No. 1 Olefins Flare, EPN DM-1101;
- r. On January 27, 2017, implemented measures in order to comply with the CO hourly MAER for the No. 2 Olefins Unit Steam Boiler, EPN DDB901B;
- s. By April 15, 2017, began recording the operating time for Stationary Engines DDM-904N, DM-177, PP3 MN1601, PP4 TN1601, DM-904N, AN-101, AN-111, and AN-402;
- t. On April 26, 2017, submitted a revised deviation report for the April 1, 2016 through September 30, 2016 reporting period to report the deviation for failing to conduct a cylinder gas audit ("CGA") earlier than two months after the previous CGA;
- u. On July 27, 2017, implemented measures in order to comply with the CO hourly MAER for the Steam Cracking Furnace, EPN DDB-102B;
- v. By July 31, 2017, restored the steam in the furnace, restarted the NH3 system heater, resumed NH3 injection, and made adjustments to the furnace to limit the firing rate and NOx emissions in order to comply with the NOx, CO, and NH3 hourly MAERs and NOx annual MAER for Furnace No. 105, EPN DDB-105:
- w. On August 17, 2017, implemented measures in order to comply with the CO hourly MAER for the Steam Cracking Furnace, EPN DB-108;

- x. On August 18, 2017, implemented measures in order to comply with the CO hourly MAER for the Steam Cracking Furnace, EPN DDB-102C;
- y. On August 23, 2017, implemented measures in order to comply with the CO hourly MAER for the Steam Cracking Furnace, EPN DDB-102A;
- z. On August 25, 2017, implemented measures in order to comply with the CO and NH3 hourly MAERs for the Steam Cracking Furnace, EPN DB-105;
- aa. On September 20, 2017, implemented measures in order to comply with the CO and NH3 hourly MAERs for the Steam Cracking Furnace, EPN DB-106;
- bb. On September 26, 2017, implemented measures in order to comply with the CO hourly MAER for the Steam Cracking Furnace, EPN DDB-102D;
- cc. By September 30, 2017, began maintaining the records for the number of vacuum truck transfers and the volume of material transferred during the liquid transfers supporting planned MSS activities;
- dd. On October 25, 2017, submitted the initial notification for Incident No. 270980;
- ee. On October 27, 2017, obtained a revision for Federal Operating Permit ("FOP") No. O2327 that included 40 CFR Part 60 Subpart VV as the applicable requirements for the No. 1 Olefins Unit Fugitives and No. 2 Olefins Unit Fugitives; included 30 Tex. Admin. Code § 115.788(a) and 30 Tex. Admin. Code ch. 117 Subchapter B as applicable requirements for Steam Cracking Furnaces DB-105 through DB-109; incorporated 30 Tex. Admin. Code § 106.412 for the Gasoline Tank; added Emergency Generator DM-177 that was constructed on or about April 1, 2006; and added Engines OLE2COMP2, UTILCOMP4, UTILCOMP5, and UTILCOMP6 that were replaced in April 2013;
- ff. On November 30, 2017, re-established communication in the distributive control system historian so that the system can collect, communicate, and record process data in order to continuously monitor and record the Aromatic Waste Minimization Project stripper bottoms in the Benzene Treatment Process 2 Unit;
- gg. By January 15, 2018, updated the procedure for the Boiler Startup by adding steps to ensure that the valves are closed after a startup activity has been completed in order to prevent the recurrence of emissions events due to the same or similar causes as Incident No. 270980;
- hh. By February 1, 2019, added logic to the Triconex to prevent the furnace from going to offline decoke if the feed Hand Indicating Control valve is still open, created a gun drill procedure to detail a response to the incident and describe a method to retest the furnace logic to take the furnace to safe state, and updated the Digital Control System ("DCS") display for clarity in order to prevent the recurrence of emissions events due to the same or similar causes as Incident No. 285534:
- ii. By April 3, 2019, updated the DDB-105 Start-Up Procedure for clarity on lighting the burners while introducing feed to the furnace and developed training for Operations to allow the board operators to practice feeding the Selective Cracking Optimum Recovery ("SCORE") furnace in order to prevent the recurrence of emissions events due to the same or similar causes as Incident No. 296381;
- jj. On September 19, 2019, stabilized the flare to reduce flaring, restored the steam pressure to increase the steam to the flare, restarted the boilers, and repaired

- the electrical system in order to operate the No. 2 Olefins Flare with no visible emissions;
- kk. On September 19, 2019, stabilized the flare to reduce flaring, restored the steam pressure to increase the steam to the flare, restarted the boilers, and repaired the electrical system in order to operate the No. 1 Olefins Flare with no visible emissions;
- ll. By December 20, 2019, added the diethylhydroxylamine ("DEHA") lab specifications to help ensure adequate residual, added a low velocity operating envelope point to track and prevent low flow, and added DEHA alarms to both units to various towers to help ensure adequate residual in order to prevent the recurrence of emissions events due to the same or similar causes as Incident Nos. 293328 and 297512;
- mm. On January 12, 2020, raised the oxygen level for the No. 1 Olefins Boiler in order to comply with the operating parameter limit of at least 2.6 percent oxygen ("% O2");
- nn. By February 10, 2020, revised the Maintenance Preventative Maintenance Procedure to include detailed steps on disassembly and reassembly, including verification of complete lifting nut disengagement from the filter head, cleanliness requirements, and maintenance witnessing nitrogen pressure test of re-assembled filter in order to prevent the recurrence of emissions events due to the same or similar causes as Incident No. 324083;
- oo. On February 27, 2020, replaced the battery for the totalizing fuel flow meter in order to continuously measure the gas and liquid fuel usage for the Dew Point Heater;
- pp. On April 11, 2020, implemented measures in order to comply with the NH3 concentration limit for Furnace No. 105;
- qq. On April 19, 2020, implemented measures in order to comply with the firing rate limit for the No. 2 Olefins Unit Steam Boiler;
- rr. By April 21, 2020, implemented time delay undervoltage protection at each applicable variable frequency drive in order to prevent the recurrence of emissions events due to the same or similar causes as Incident No. 332637;
- ss. On April 28, 2020, submitted a copy of the performance test reports for Turbine 1, Turbine 2, Boiler 2, and the Dew Point Heater;
- tt. On May 15, 2020, conducted a stack test demonstrating compliance with the particulate matter ("PM") hourly MAER for Boiler 1, EPN BLR1;
- uu. On May 19, 2020, conducted a stack test demonstrating compliance with the PM hourly MAER for Boiler 2, EPN BLR2;
- vv. On May 20, 2020, conducted a stack test demonstrating compliance with the NH3 concentration limit for Boiler 3, EPN BLR3;
- ww. On May 21, 2020, conducted a stack test demonstrating compliance with the VOC hourly MAER for Turbine 2, EPN Turbine 2;
- xx. On August 22, 2020, implemented measures in order to comply with the NH3 slip concentration limit for Furnace No. 105;
- yy. On August 29, 2020, implemented measures in order to comply with the NH3 concentration limit for the Steam Cracking Furnace;

- zz. On September 30, 2020, added natural gas to the No. 1 Olefins Facilities Flare in order to maintain the net heating value of the gas being combusted at 300 British thermal units per standard cubic foot ("Btu/scf") or greater;
- aaa. By September 30, 2020, implemented a reasonable inquiry process for the deviation report process by reviewing data on a more frequent basis and expanding the review process to include operators, engineers, and others in order to ensure that all instances of deviations are reported in a timely manner;
- bbb. By October 1, 2020, removed the local stop switch from the current enclosure and installed a new switch rated for the area electrical classifications in order to prevent the recurrence of emissions events due to the same or similar causes as Incident No. 275491;
- ccc. By November 2, 2020, ceased operations of the Dew Point Heater;
- ddd. By November 30, 2020, labeled valves in the field to help ensure proper line-ups are made in order to prevent the recurrence of emissions events due to the same or similar causes as Incident No. 339521:
- eee. On December 14, 2020, created and maintained the final records for the non-reportable emissions events that occurred from December 10, 2017 to March 8, 2018, from April 16, 2018 to April 20, 2018, and from November 14, 2018 to November 28, 2018:
- fff. On February 4, 2021, submitted revised deviation reports for the October 1, 2017 through March 31, 2018, April 1, 2018 through September 30, 2018, and October 1, 2018 through March 31, 2019 reporting periods to report the deviations for failing to create the final records for the non-reportable emissions events no later than two weeks after the end of each emissions event;
- ggg. By February 28, 2021, implemented an improved maintenance management plan by having the Operations personnel review the emission points where the emissions originated from every month and demonstrated compliance with the VOC annual MAER for the Olefins 1 and 2 Flare, EPN FLAREMSSCAP;
- hhh. By March 31, 2021, developed communication protocols and training for the operators on the proper radio etiquette in order to prevent the recurrence of emissions events due to the same or similar causes as Incident No. 333191;
- iii. By April 6, 2021, implemented a low output alarm at 10 percent to alert the operators if the valve fails inadvertently in order to prevent the recurrence of emissions events due to the same or similar causes as Incident No. 341971;
- jjj. By April 19, 2021, performed maintenance on the compressor in order to prevent the recurrence of emissions events due to the same or similar causes as Incident No. 354056;
- kkk. By May 31, 2021, implemented measures to comply with the ethylene, CO, and NOx annual MAERs for the Olefins 2 Flare Routine, Startup, Shutdown, and Maintenance Emissions, EPN DDM-3101MSS;
- lll. By August 31, 2021, added inspection of the rack and servo linkage pins to the Maintenance Preventative Maintenance Procedure in order to prevent recurrence to prevent the recurrence of emissions events due to the same or similar causes as Incident No. 344750;
- mmm. By September 27, 2021, replaced the capacitor bank breaker, tested the electrical equipment insulation for deterioration, conducted switching only on an as

- needed basis, and calculated and verified that the capacitor charging time is less than 10 seconds in order to prevent the recurrence of emissions events due to the same or similar causes as Incident No. 352585;
- nnn. By December 20, 2021, installed a sampling system upstream of the selective catalytic reduction catalyst bed and developed a mapping procedure to provide operations with a guideline for preparation of the turbines for mapping in order to prevent the recurrence of emissions events due to the same or similar causes as Incident No. 333379:
- ooo. By April 14, 2022, obtained Permit by Rule ("PBR") Registration No. 168626 that increased the natural gas flow to the No. 1 Olefins Flare in order to maintain the net heating value of the gas being combusted at 300 Btu/scf or greater;
- ppp. By June 23, 2022, evaluated the Abnormal Situation Management ("ASM") Control Language ("CL") programs for all trip scenarios on similar Kinetics Technology International ("KTI") furnaces to confirm the proper actions if activated, updated the DCS control narratives, created a cause and effect matrix for KTI furnace trip scenarios, and created guidance for testing the CL programs to ensure proper function in order to prevent the recurrence of emissions events due to the same or similar causes as Incident No. 291947;
- qqq. By June 28, 2022, implemented a new DEHA injection in the feed to the unit, installed new vent tubing for continuous purge and removal of potential oxygen from the system, and added operator rounds to check the insulation bands for expansion in order to prevent the recurrence of emissions events due to the same or similar causes as Incident No. 342492;
- rrr. By July 2, 2022, conducted equipment preventative maintenance while equipment is down until the quadvoter upgrade project is complete and revised procedure H0302A08 to include steps related to re-introducing feed to T-305 and T-307 after acetylene run in order to prevent the recurrence of emissions events due to the same or similar causes as Incident No. 364479;
- sss. On September 26, 2022, permanently shut down the No. 1 Olefins Unit Steam Boiler, EPN DB-901A;
- ttt. By September 27, 2022, installed sample points and began routine sampling for 2301 and 3301 Lube Oil and cleaned the lube oil reservoirs for Turbine 1 and Turbine 2 in order to prevent the recurrence of emissions events due to the same or similar causes as Incident No. 334381;
- uuu. By October 21, 2022, developed a document that provides guidelines to evaluate acoustic and flow induced vibration, updated the Project Design Basis Template to capture a review of the bypass scope control valves in critical applications, and updated the Relief System Design Guide to include considerations around piping design and acoustic-induced vibration in order to prevent the recurrence of emissions events due to the same or similar causes as Incident No. 340681;
- vvv. By May 26, 2023, verified the contractor's quality control manual addresses non-conformance issues and developed an inspection and testing plan to identify and document any issues that need to be addressed on the package prior to final sign-off in order to prevent the recurrence of emissions events due to the same or similar causes as Incident No. 340661;

- www. By July 14, 2023, established a review process to allow two levels of review for any reportable emissions event in order to ensure that all of the required information is identified on the final records for reportable emissions events;
- xxx. By November 1, 2023, removed Stationary Reciprocating Internal Combustion Engines UTILCMP3, UTILCMP4, UTILCMP6, OLE2COMP2 from the Plant;
- yyy. By July 29, 2024, implemented a 10 degree Fahrenheit maximum set point change limit on the reactor bed outlet temperature control in order to prevent the recurrence of emissions events due to the same or similar causes as Incident No. 291225; and
- ZZZ. On August 23, 2024, obtained PBR No. 177025 to downsize Stationary Reciprocating Internal Combustion Engine DCPCOMP2 and updated FOP No. 0237 through the use of the off-permit change process, in accordance with 30 Tex. Admin Code § 122.222(k).
- aaaa. December 18, 2024, submitted a permit amendment application for NSR Permit Nos. 123117, PSDTX1460, and GHGPSDTX135 to address the exceedances for the SO2, CO, and NOx hourly MAER and the NH3, CO, and NOx concentration limits for Turbines 1 and 2, the NH3 hourly MAER for Turbine 2, the CO and NOx concentration limits for Boilers 1 and 3, the NOx concentration limit for Boiler 2, the SO2 hourly MAER for Boilers 1, 2, and 3, the CO and NOx hourly MAER for Boilers 1 and 3, the NH3 hourly MAER for Boiler 1, and the hourly PM MAER for Boiler 3.

II. ALLEGATIONS

- 1. During a record review for the Plant conducted from January 21, 2016 through August 9, 2016, an investigator documented that the Respondent:
 - a. Failed to comply with the MAERs, in violation of 30 Tex. Admin. Code §§ 101.20(3), 116.115(b)(2)(F) and (c), and 122.143(4), NSR Permit Nos. 95 and PSDTX854M2, Special Conditions ("SC") No. 1, FOP No. O2327, General Terms and Conditions ("GTC") and Special Terms and Conditions ("STC") No. 20, and Tex. HEALTH & SAFETY CODE § 382.085(b). Specifically, the Respondent exceeded the benzene MAER of 1.01 pounds per hour ("lbs/hr") by a range from 0.01 lb/hr to 0.41 lb/hr and exceeded the VOC MAER of 5.96 lbs/hr by a range from 0.09 lb/hr to 2.51 lbs/hr for a total of seven hours on four days from January 8, 2015 to May 4, 2015 for the Olefins 1 API Separator, EPN FAM1704, resulting in the unauthorized release of 1.34 pounds ("lbs") of benzene emissions and 8.45 lbs of VOC emissions.
 - b. Failed to submit an application for a revision to an FOP for those activities at a site which change, add, or remove one or more permit terms or conditions, in violation of 30 Tex. Admin. Code § 122.210(a) and Tex. Health & Safety Code § 382.085(b). Specifically, after FOP No. O2327 was revised on June 4, 2013, the Respondent did not submit an application to revise FOP No. O2327 to include 40 Code of Federal Regulations ("CFR") Part 60 Subpart VV as the applicable requirements for the No. 1 Olefins Unit Fugitives and No. 2 Olefins Unit Fugitives.

- c. Failed to report all instances of deviations, in violation of 30 Tex. Admin. Code §§ 122.143(4) and 122.145(2)(A), FOP No. O2327, GTC, and Tex. Health & Safety Code § 382.085(b). Specifically, the deviation reports for the October 1, 2014 through March 31, 2015 and April 1, 2015 through September 30, 2015 reporting periods did not include the deviation for failing to submit an application to revise FOP No. O2327 to include 40 CFR Part 60 Subpart VV as the applicable requirements for the No. 1 Olefins Unit Fugitives and No. 2 Olefins Unit Fugitives.
- d. Failed to comply with the MAER, in violation of 30 Tex. ADMIN. CODE §§ 101.20(3), 116.115(b)(2)(F) and (c), and 122.143(4), NSR Permit Nos. 95 and PSDTX854M2, SC No. 1, FOP No. O2327, GTC and STC No. 20, and Tex. Health & Safety Code § 382.085(b). Specifically, the Respondent exceeded the CO MAER of 18.32 lbs/hr by 12.92 lbs/hr for one hour on January 17, 2015 for the Steam Cracking Furnace, EPN DB-106, resulting in 12.92 lbs of unauthorized CO emissions.
- e. Failed to comply with the MAER, in violation of 30 Tex. Admin. Code §§ 101.20(3), 116.115(b)(2)(F) and (c), and 122.143(4), NSR Permit Nos. 95 and PSDTX854M2, SC No. 1, FOP No. O2327, GTC and STC No. 20, and Tex. Health & Safety Code § 382.085(b). Specifically, the Respondent exceeded the CO MAER of 18.32 lbs/hr by a range from 1.16 lbs/hr to 98.10 lbs/hr for a total of four hours on three days from October 2, 2014 to January 14, 2015 for the Steam Cracking Furnace, EPN DB-107, resulting in 163.18 lbs of unauthorized CO emissions.
- f. Failed to comply with the MAERs, in violation of 30 Tex. Admin. Code §§ 101.20(3), 116.115(b)(2)(F) and (c), and 122.143(4), NSR Permit Nos. 95 and PSDTX854M2, SC No. 1, FOP No. O2327, GTC and STC No. 20, and Tex. Health & Safety Code § 382.085(b). Specifically, the Respondent exceeded the VOC MAER of 2.05 lbs/hr by 0.01 lb/hr for a total of two hours on October 19, 2014 and December 18, 2014 and exceeded the CO MAER of 18.32 lbs/hr by 26.73 lbs/hr for one hour on April 9, 2015 for the Steam Cracking Furnace, EPN DB-105, resulting in the unauthorized release of 0.02 lb of VOC emissions and 26.73 lbs of CO emissions.
- g. Failed to comply with the MAER, in violation of 30 Tex. Admin. Code §§ 101.20(3), 116.115(b)(2)(F) and (c), and 122.143(4), NSR Permit Nos. 95 and PSDTX854M2, SC No. 1, FOP No. O2327, GTC and STC No. 20, and Tex. Health & Safety Code § 382.085(b). Specifically, the Respondent exceeded the CO MAER of 7.03 lbs/hr by a range from 0.16 lb/hr to 1.87 lbs/hr for a total of four hours on four days from November 21, 2014 to February 9, 2015 for the Steam Cracking Furnace, EPN DDB-102A, resulting in 3.75 lbs of unauthorized CO emissions.
- h. Failed to comply with the MAERs, in violation of 30 Tex. Admin. Code §§ 101.20(3), 116.115(b)(2)(F) and (c), and 122.143(4), NSR Permit Nos. 95 and PSDTX854M2, SC No. 1, FOP No. O2327, GTC and STC No. 20, and Tex. Health & Safety Code § 382.085(b). Specifically, the Respondent exceeded the NOx MAER of 26.60 lbs/hr by a range from 0.01 lb/hr to 1.87 lbs/hr for a total of 52 hours on 11 days from December 2, 2014 to January 8, 2015 and exceeded the CO MAER of 7.03 lbs/hr by a range from 0.41 lb/hr to 7.66 lbs/hr for a total of three hours on three days from February 8, 2015 to March 18, 2015 for the Steam Cracking Furnace, EPN DDB-102B, resulting in the unauthorized release of 29.66 lbs of NOx emissions and 10.72 lbs of CO emissions.

- i. Failed to comply with the MAER, in violation of 30 Tex. Admin. Code §§ 101.20(3), 116.115(b)(2)(F) and (c), and 122.143(4), NSR Permit Nos. 95 and PSDTX854M2, SC No. 1, FOP No. O2327, GTC and STC No. 20, and Tex. Health & Safety Code § 382.085(b). Specifically, the Respondent exceeded the CO MAER of 7.03 lbs/hr by 23.24 lbs/hr for one hour on October 21, 2014 for the Steam Cracking Furnace, EPN DDB-102C, resulting in 23.24 lbs of unauthorized CO emissions.
- j. Failed to comply with the MAER, in violation of 30 Tex. ADMIN. CODE §§ 116.115(b)(2)(F) and (c) and 122.143(4), NSR Permit No. 101, SC No. 1, FOP No. O2327, GTC and STC No. 20, and Tex. Health & Safety Code § 382.085(b). Specifically, the Respondent exceeded the CO MAER of 14.40 lbs/hr by a range from 6.94 lbs/hr to 64.51 lbs/hr for a total of 169 hours on nine days from May 26, 2015 to June 2, 2015 and on August 20, 2015 for the No. 2 Olefins Unit Steam Boiler, EPN DDB901B, resulting in 9,806.82 lbs of unauthorized CO emissions.
- k. Failed to comply with the emissions limit, in violation of 30 Tex. Admin. Code §§ 116.115(c) and 122.143(4), NSR Permit No. 101, SC No. 3.B.(2), FOP No. O2327, GTC and STC No. 20, and Tex. Health & Safety Code § 382.085(b). Specifically, the Respondent exceeded the CO emissions limit of 0.037 pound per one million British thermal units ("lb/MMBtu") based on the higher heating value of the fuel on a 24-hour average by a range from 0.011 lb/MMBtu to 0.299 lb/MMBtu for a total of 172 hours on nine days from May 11, 2015 to June 2, 2015 for the No. 2 Olefins Unit Steam Boiler, EPN DDB901B.
- 2. During a record review for the Plant conducted from November 15, 2016 through November 17, 2016, an investigator documented that the Respondent:
 - a. Failed to submit an application for a revision to an FOP for those activities at a site which change, add, or remove one or more permit terms or conditions, in violation of 30 Tex. Admin. Code § 122.210(a) and Tex. Health & Safety Code § 382.085(b). Specifically, after FOP No. O2327 was revised on June 4, 2013, the Respondent did not submit an application to revise FOP No. O2327 to include 30 Tex. Admin. Code § 115.788(a) and 30 Tex. Admin. Code ch. 117 Subchapter B as the applicable requirements for Steam Cracking Furnaces DB-105 through DB-109 and incorporate 30 Tex. Admin. Code § 106.412 for the Gasoline Tank.
 - b. Failed to record the operating time for stationary internal combustion engines with a non-resettable elapsed run-time meter, in violation of 30 Tex. Admin. Code §§ 117.340(j) and 122.143(4), FOP No. O2327, GTC and STC No. 1.A., and Tex. Health & Safety Code § 382.085(b). Specifically, the Respondent did not equip Stationary Engines DDM-904N, DM-177, PP3 MN1601, PP4 TN1601, DM-904N, AN-101, AN-111, and AN-402 with non-resettable elapsed run time meters to record the operating time.
 - c. Failed to obtain a revision for an FOP prior to operating emission units at the site, 30 Tex. Admin. Code §§ 122.121 and 122.210(a) and Tex. Health & Safety Code §§ 382.054 and 382.085(b). Specifically, after FOP No. O2327 was revised on July 29, 2005, the Respondent did not submit an application to revise FOP No. O2327 to add Emergency Generator DM-177 that was constructed on or about April 1, 2006 and to add Engines OLE2COMP2, UTILCOMP4, UTILCOMP5, and

UTILCOMP6 that were replaced in April 2013, resulting in the operation of these emission units prior to obtaining authorization.

- d. Failed to submit the 40 CFR Part 63 Subpart ZZZZ compliance reports no later than July 31 or January 31, whichever date is the first date following the end of the semiannual reporting period, in violation of 30 Tex. Admin. Code §§ 101.20(2), 113.1090, and 122.143(4), 40 CFR § 63.6650(b)(3), FOP No. O2327, GTC and STC No. 1.A., and Tex. Health & Safety Code § 382.085(b). Specifically, the Respondent did not submit the 40 CFR Part 63 Subpart ZZZZ compliance reports for the January 1, 2013 through June 30, 2013, July 1, 2013 through December 31, 2013, January 1, 2014 through June 30, 2014, July 1, 2014 through December 31, 2014, January 1, 2015 through June 30, 2015, July 1, 2015 through December 31, 2015, January 1, 2016 through June 30, 2016 reporting periods for Firewater Pump AG-203B and Level Control Pump AG-2705D by July 31, 2013, January 31, 2014, July 31, 2014, January 31, 2015, July 31, 2015, January 31, 2016, and July 31, 2016, respectively.
- e. Failed to maintain records for the calibration of the LEL detector, in violation of 30 Tex. Admin. Code §§ 101.20(3), 116.115(c), and 122.143(4), NSR Permit Nos. 95 and PSDTX854M2, SC No. 61.C.(1), FOP No. O2327, GTC and STC No. 20, and Tex. Health & Safety Code § 382.085(b). Specifically, the Respondent did not maintain the records for the calibration of the LEL detectors for Unit Nos. D5, D10, M2, M4, M5, M8, M9, T5, and Z14 on 13 occasions during MSS activities that occurred from October 1, 2015 to September 30, 2016 and did not record the calibration of the LEL detector for the No. 1 Olefins Unit MSS activities that occurred on nine occasions from May 29, 2016 to June 21, 2016.
- f. Failed to maintain records for the functionality test of the LEL detector, in violation of 30 Tex. Admin. Code §§ 101.20(3), 116.115(c), and 122.143(4), NSR Permit Nos. 95 and PSDTX854M2, SC No. 61.C.(2), FOP No. O2327, GTC and STC No. 20, and Tex. Health & Safety Code § 382.085(b). Specifically, the Respondent did not maintain the records for the functionality test of the LEL detectors Unit Nos. A9, D10, D12, D20, H12, H18, H20, J3, J6, M1, M2, M3, M7, M8, M9, and T5 on 33 occasions during MSS activities that occurred from October 1, 2015 to September 30, 2016 and did not record the functionality test data of the LEL detector for the No. 1 Olefins Unit MSS activities that occurred on nine occasions from May 29, 2016 through June 21, 2016.
- g. Failed to maintain records containing the information and data sufficient to demonstrate compliance with the permit, in violation of 30 Tex. Admin. Code §§ 101.20(3), 116.115(b)(2)(E)(i), and 122.143(4), NSR Permit Nos. 95 and PSDTX854M2, General Conditions No. 7, FOP No. O2327, GTC and STC No. 20, and Tex. Health & Safety Code § 382.085(b). Specifically, the Respondent did not maintain the records for the LEL readings during the MSS activities that occurred on November 5, 2015 and April 4, 2016 to demonstrate compliance with SC No. 61.C. of NSR Permit Nos. 95 and PSDTX854M2.
- h. Failed to comply with the concentration limit, in violation of 30 Tex. Admin. Code §§ 101.20(2), 113.120, 113.890, and 122.143(4), 40 CFR §§ 63.138(b)(1)(i) and 63.2450(a), FOP No. O2327, GTC and STC No. 1.A., and Tex. Health & Safety Code § 382.085(b). Specifically, the Respondent exceeded the benzene outlet concentration limit of 50 parts per million by weight ("ppmw") by a range from

- 2.8 ppmw to 410.0 ppmw for a total of 16 hours on three days from February 4, 2016 to March 31, 2016 for the Second Stage Hydrotreater Unit Treatment Process PRO-SSMON and by a range from 17.1 ppmw to 87.0 ppmw for a total of two hours on April 1, 2016 for the Olefins 2 Aromatic Waste Minimization Project Treatment Process PRO-AWMP2.
- i. Failed to comply with the MAER, in violation of 30 Tex. Admin. Code §§ 101.20(3), 116.115(b)(2)(F) and (c), and 122.143(4), NSR Permit Nos. 95 and PSDTX854M2, SC No. 1, FOP No. O2327, GTC and STC No. 20, and Tex. Health & Safety Code § 382.085(b). Specifically, the Respondent exceeded the CO MAER of 9.25 lbs/hr by a range from 0.01 lb/hr to 0.33 lb/hr for a total of 39 hours from November 9, 2015 through November 20, 2015 for the Steam Cracking Furnace, EPN DDB-101B, resulting in 4.27 lbs of unauthorized CO emissions.
- j. Failed to comply with the MAERs, in violation of 30 Tex. Admin. Code §§ 116.115(b)(2)(F) and (c) and 122.143(4), NSR Permit No. 97769, SC No. 1, FOP No. O2327, GTC and STC No. 20, and Tex. Health & Safety Code § 382.085(b). Specifically, the Respondent exceeded the NOx MAER of 14.85 lbs/hr by a range from 0.23 lb/hr to 7.97 lbs/hr for a total of four hours on three days from February 24, 2016 to September 20, 2016 and exceeded the CO MAER of 21.78 lbs/hr by a range from 7.89 lbs/hr to 67.52 lbs/hr for a total of three hours on July 26, 2016 and July 28, 2016 for Furnace No. 105, EPN DDB-105, resulting in the unauthorized release of 9.34 lbs of NOx emissions and 88.02 lbs of CO emissions.
- k. Failed to comply with the concentration limit, in violation of 30 Tex. Admin. Code §§ 117.310(c)(2)(B) and 122.143(4), FOP No. O2327, GTC and STC No. 1.A., and Tex. Health & Safety Code § 382.085(b). Specifically, the Respondent exceeded the NH3 concentration limit of 10 parts per million by volume dry ("ppmvd") at 3.0 percent oxygen ("% O2") based on a 24-hour averaging period by a range from 0.02 ppmvd to 7.94 ppmvd for a total of 503 hours on 38 days from November 7, 2015 to September 9, 2016 for the Steam Cracking Furnace, EPN DB-109.
- l. Failed to provide records upon request and maintain records containing sufficient information to demonstrate compliance with all applicable Permits by Rules ("PBRs"), in violation of 30 Tex. Admin. Code §§ 106.8(c)(2) and (4) and 122.143(4), FOP No. O2327, GTC and STC No. 22, and Tex. Health & Safety Code § 382.085(b). Specifically, the Respondent was requested to provide the records containing sufficient information to demonstrate compliance for each PBR and standard exemption listed in the NSR Authorization Table of FOP No. O2327 by February 23, 2017, but 40% of the requested records were not provided.
- m. Failed to report all instances of deviations, in violation of 30 Tex. Admin. Code §§ 122.143(4) and 122.145(2)(A), FOP No. O2327, GTC, and Tex. Health & Safety Code § 382.085(b). Specifically, the deviation reports for the October 1, 2015 through March 31, 2016 and April 1, 2016 through September 30, 2016 reporting periods did not include the deviations for failing to obtain a revision for FOP No. O2327 prior to operating emission units at the site; failing to submit an application for a revision to FOP No. O2327 for those activities at a site which change, add, or remove one or more permit terms or conditions; and failing to submit the 40 CFR Part 63 Subpart ZZZZ compliance reports.

- 3. During a record review for the Plant conducted from January 10, 2018 through February 15, 2019, an investigator documented that the Respondent:
 - a. Failed to maintain records to support planned MSS activities, in violation of 30 Tex. Admin. Code §§ 101.20(3), 116.115(c), and 122.143(4), NSR Permit Nos. 95 and PSDTX854M2, SC Nos. 65.A. and 65.C., FOP No. O2327, GTC and STC No. 20, and Tex. Health & Safety Code § 382.085(b). Specifically, the Respondent did not record the number of vacuum truck transfers and the volume of material transferred during five liquid transfers that occurred from April 1, 2017 to September 30, 2017.
 - b. Failed to comply with the MAERs, in violation of 30 Tex. Admin. Code §§ 101.20(3), 116.115(b)(2)(F) and (c), and 122.143(4), NSR Permit Nos. 95 and PSDTX854M2, SC No. 2, FOP No. O2327, GTC and STC No. 20, and Tex. Health & SAFETY Code § 382.085(b). Specifically, the Respondent exceeded the NOx MAER of 45.01 lbs/hr by a range from 0.23 lb/hr to 4.59 lbs/hr for a total of 12 hours and exceeded the CO MAER of 231.90 lbs/hr by a range from 5.24 lbs/hr to 20.82 lbs/hr for a total of 11 hours on November 21, 2016 and November 22, 2016 for the No. 1 Olefins Flare, EPN DM-1101, resulting in the unauthorized release of 34.04 lbs of NOx emissions and 144.22 lbs of CO emissions.
 - c. Failed to comply with the MAERs, in violation of 30 Tex. Admin. Code §§ 116.115(b)(2)(F) and (c) and 122.143(4), NSR Permit No. 97769, SC No. 1, FOP No. O2327, GTC and STC No. 20, and Tex. Health & Safety Code § 382.085(b). Specifically, the Respondent exceeded the NOx MAER of 14.85 lbs/hr by a range from 0.01 lb/hr to 38.20 lbs/hr for a total of 11 hours on three days from December 29, 2016 to February 5, 2017, exceeded the CO MAER of 21.78 lbs/hr by 17.93 lbs/hr and 55.51 lbs/hr for a total of two hours on April 3, 2017, exceeded the NH3 MAER of 4.77 lbs/hr by 0.64 lb/hr on January 21, 2017 and 2.25 lbs/hr on April 3, 2017, and exceeded the NOx annual MAER of 21.68 tons per year ("tpy") based on a 12-month rolling period for the 12-month periods ending from October 2016 through June 2017 for Furnace No. 105, EPN DDB-105, resulting in the unauthorized release of 0.90 ton of NOx emissions, 73.44 lbs of CO emissions, and 2.89 lbs of NH3 emissions.
 - d. Failed to comply with the MAERs, in violation of 30 Tex. Admin. Code §§ 101.20(3), 116.115(b)(2)(F) and (c), and 122.143(4), NSR Permit Nos. 95 and PSDTX854M2, SC No. 2, FOP No. O2327, GTC and STC No. 20, and Tex. Health & SAFETY Code § 382.085(b). Specifically, the Respondent exceeded the CO MAER of 18.32 lbs/hr by a range from 0.59 lb/hr to 12.86 lbs/hr for a total of four hours on four days from October 18, 2016 to August 9, 2017 and exceeded the NH3 MAER of 4.36 lbs/hr by 5.47 lbs/hr for one hour on August 25, 2017 for the Steam Cracking Furnace, EPN DB-105, resulting in the unauthorized release of 22.88 lbs of CO emissions and 5.47 lbs of NH3 emissions.
 - e. Failed to comply with the MAER, in violation of 30 Tex. Admin. Code §§ 101.20(3), 116.115(b)(2)(F) and (c), and 122.143(4), NSR Permit Nos. 95 and PSDTX854M2, SC No. 2, FOP No. O2327, GTC and STC No. 20, and Tex. Health & Safety Code § 382.085(b). Specifically, the Respondent exceeded the CO MAER of 7.03 lbs/hr by a range from 0.14 lb/hr to 55.97 lbs/hr for a total of 22 hours on eight days from October 21, 2016 to July 27, 2017 for the Steam Cracking Furnace, EPN DDB-102B, resulting in 172.79 lbs of unauthorized CO emissions.

- f. Failed to comply with the MAERs, in violation of 30 Tex. Admin. Code §§ 101.20(3), 116.115(b)(2)(F) and (c), and 122.143(4), NSR Permit Nos. 95 and PSDTX854M2, SC No. 2, FOP No. O2327, GTC and STC No. 20, and Tex. Health & SAFETY Code § 382.085(b). Specifically, the Respondent exceeded the CO MAER of 18.32 lbs/hr by a range from 1.33 lbs/hr to 55.55 lbs/hr for a total of eight hours on eight days from November 24, 2016 to September 20, 2017 and exceeded the NH3 MAER of 4.36 lbs/hr by 3.54 lbs/hr and 7.17 lbs/hr for a total of two hours on August 25, 2017 for the Steam Cracking Furnace, EPN DB-106, resulting in unauthorized release of 163.88 lbs of CO emissions and 10.71 lbs of NH3 emissions.
- g. Failed to comply with the MAER, in violation of 30 Tex. Admin. Code §§ 101.20(3), 116.115(b)(2)(F) and (c), and 122.143(4), NSR Permit Nos. 95 and PSDTX854M2, SC No. 2, FOP No. O2327, GTC and STC No. 20, and Tex. Health & Safety Code § 382.085(b). Specifically, the Respondent exceeded the CO MAER of 7.03 lbs/hr by a range from 0.21 lb/hr to 12.55 lbs/hr for a total of seven hours on four days from November 28, 2016 to September 26, 2017 for the Steam Cracking Furnace, EPN DDB-102D, resulting in 40.26 lbs of unauthorized CO emissions.
- h. Failed to comply with the MAER, in violation of 30 Tex. Admin. Code §§ 101.20(3), 116.115(b)(2)(F) and (c), and 122.143(4), NSR Permit Nos. 95 and PSDTX854M2, SC No. 2, FOP No. O2327, GTC and STC No. 20, and Tex. Health & Safety Code § 382.085(b). Specifically, the Respondent exceeded the CO MAER of 18.32 lbs/hr by a range from 0.14 lb/hr to 20.28 lbs/hr for a total of 10 hours on nine days from November 30, 2016 to August 17, 2017 for the Steam Cracking Furnace, EPN DB-108, resulting in 60.78 lbs of unauthorized CO emissions.
- i. Failed to comply with the MAER, in violation of 30 Tex. ADMIN. CODE §§ 116.115(b)(2)(F) and (c) and 122.143(4), NSR Permit No. 101, SC No. 1, FOP No. O2327, GTC and STC No. 20, and Tex. Health & Safety Code § 382.085(b). Specifically, the Respondent exceeded the CO MAER of 14.40 lbs/hr by a range from 0.08 lb/hr to 27.36 lbs/hr for a total of 106 hours on 13 days from November 6, 2016 to January 27, 2017 for the No. 2 Olefins Unit Steam Boiler, EPN DDB901B, resulting in 460.29 lbs of unauthorized CO emissions.
- j. Failed to comply with the MAER, in violation of 30 Tex. Admin. Code §§ 101.20(3), 116.115(b)(2)(F) and (c), and 122.143(4), NSR Permit Nos. 95 and PSDTX854M2, SC No. 2, FOP No. O2327, GTC and STC No. 20, and Tex. Health & Safety Code § 382.085(b). Specifically, the Respondent exceeded the CO MAER of 7.03 lbs/hr by a range from 0.73 lb/hr to 7.70 lbs/hr for a total of six hours on three days from February 23, 2017 to August 23, 2017 for the Steam Cracking Furnace, EPN DDB-102A, resulting in 26.96 lbs of unauthorized CO emissions.
- k. Failed to comply with the MAER, in violation of 30 Tex. Admin. Code §§ 101.20(3), 116.115(b)(2)(F) and (c), and 122.143(4), NSR Permit Nos. 95 and PSDTX854M2, SC No. 2, FOP No. O2327, GTC and STC No. 20, and Tex. Health & Safety Code § 382.085(b). Specifically, the Respondent exceeded the CO MAER of 7.03 lbs/hr by a range from 2.02 lbs/hr to 32.69 lbs/hr for a total of six hours on four days from March 19, 2017 to August 18, 2017 for the Steam Cracking Furnace, EPN DDB-102C, resulting in 81.21 lbs of unauthorized CO emissions.

- 1. Failed to report all instances of deviations, in violation of 30 Tex. Admin. Code §§ 122.143(4) and 122.145(2)(A), FOP No. O2327, GTC, and Tex. Health & Safety Code § 382.085(b). Specifically, the deviation report for the April 1, 2016 through September 30, 2016 reporting period did not include the deviation for conducting a CGA earlier than two months after the previous CGA.
- 4. During a record review for the Plant conducted from February 14, 2018 through February 27, 2018, an investigator documented that the Respondent:
 - a. 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. O2327, GTC and STC No. 2.F., and Tex. Health & Safety Code § 382.085(b). Specifically, although Incident No. 270980 began on September 4, 2017 at 9:55 a.m., Incident No. 270980 was not discovered until October 24, 2017 at 9:55 a.m. so the initial notification for Incident No. 270980 was due by October 25, 2017 at 9:55 a.m., but was not submitted until October 25, 2017 at 2:47 p.m.
 - b. 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. 95 and PSDTX854M2, SC No. 2, FOP No. O2327, GTC and STC No. 20, and Tex. Health & Safety Code § 382.085(b). Specifically, the Respondent released 8,617.16 lbs of VOC as fugitive emissions, during an emissions event (Incident No. 270980) that began on September 4, 2017 and lasted 1,201 hours.
- 5. During a record review for the Plant conducted from September 18, 2018 through November 9, 2018, an investigator documented that 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. 95 and PSDTX854M2, SC No. 2, FOP No. 02327, GTC and STC No. 20, and Tex. Health & Safety Code § 382.085(b). Specifically, the Respondent released 32,724.77 lbs of CO, 6,422.18 lbs of NOx, and 36,234.14 lbs of VOC as fugitive emissions, during an emissions event (Incident No. 275491) that occurred on January 2, 2018 and lasted 18 hours and 15 minutes.
- 6. During a record review for the Plant conducted from March 31, 2020 through August 26, 2020, an investigator documented that the Respondent:
 - a. Failed to maintain the net heating value of the gas being combusted at 300 Btu/scf or greater if the flare is steam-assisted or air-assisted, in violation of 30 Tex. Admin. Code §§ 101.20(1), (2), and (3), 113.100, 116.115(c), and 122.143(4), 40 CFR §§ 60.18(c)(3)(ii) and 63.11(b)(6)(ii), NSR Permit Nos. 95 and PSDTX854M2 (effective December 21, 2015, SC No. 12.A., NSR Permit Nos. 95 and PSDTX854M2 (effective August 8, 2018), SC No. 7.A., FOP No. O2327, GTC and STC Nos. 1.A. and 20, and Tex. Health & Safety Code § 382.085(b). Specifically, the net heating value of the gas being combusted by the No. 1 Olefins Flare was less than 300 Btu/scf when the net heating value ranged from 0.00 Btu/scf to 299.47 Btu/scf for 668 hours on 178 days from August 1, 2018 to September 24, 2019.
 - b. Failed to operate a flare with no visible emissions except periods not to exceed a total of five minutes during any two consecutive hours, in violation of 30 Tex. ADMIN. CODE §§ 101.20(1), (2), and (3), 116.115(c), and 122.143(4), 40 CFR §§ 60.18(c)(1) and 63.11(b)(4), NSR Permit Nos. 95 and PSDTX854M2 (effective

December 21, 2015), SC No. 12.C., NSR Permit Nos. 95 and PSDTX854M2 (effective August 8, 2018), SC No. 7.C., FOP No. O2327, GTC and STC Nos. 1.A., 3.A.(i), and 26, and Tex. Health & Safety Code § 382.085(b). Specifically, the Respondent documented that visible emissions were observed for a total of 63 hours and 34 minutes on 12 days from June 2, 2018 to September 19, 2019 for the No. 2 Olefins Flare.

- c. Failed to operate a flare with no visible emissions except periods not to exceed a total of five minutes during any two consecutive hours, in violation of 30 Tex. ADMIN. CODE §§ 101.20(1), (2) and (3), 116.115(c), and 122.143(4), 40 CFR §§ 60.18(c)(1) and 63.11(b)(4), NSR Permit Nos. 95 and PSDTX854M2 (effective December 21, 2015), SC No. 12.C., NSR Permit Nos. 95 and PSDTX854M2 (effective August 8, 2018), SC No. 7.C., FOP No. 02327, GTC and STC Nos. 1.A., 3.A.(i), and 26, and Tex. Health & Safety Code § 382.085(b). Specifically, the Respondent documented that visible emissions were observed for a total of six hours and 18 minutes on four days from September 29, 2018 to September 19, 2019 for the No. 1 Olefins Flare.
- d. Failed to continuously monitor and record a process parameter for the treatment process or wastewater treatment system unit, in violation of 30 Tex. Admin. Code §§ 101.20(2) and 122.143(4), 40 CFR § 61.354(a)(2), FOP No. O2327, GTC and STC No. 1.A., and Tex. Health & Safety Code § 382.085(b). Specifically, the benzene analyzers did not continuously monitor the Aromatic Waste Minimization Project stripper bottoms in the Benzene Treatment Process 2 Unit for a total of 95 hours and 37 minutes on seven days from October 11, 2017 to November 30, 2017.
- e. Failed to comply with the emissions limit, in violation of 30 Tex. Admin. Code §§ 116.115(c) and 122.143(4), NSR Permit No. 101, SC No. 3.A.(1), FOP No. O2327, GTC and STC No. 26, and Tex. Health & Safety Code § 382.085(b). Specifically, the Respondent exceeded the NOx emissions limit of 0.2 lb/MMBtu by a range from 0.01 lb/MMBtu to 0.07 lb/MMBtu for a total of 220 hours on 13 days from October 5, 2018 to March 25, 2019 for the No. 1 Olefins Unit Steam Boiler, EPN DB-901A.
- f. Failed to create a final record for a non-reportable emissions event no later than two weeks after the end of an emissions event, in violation of 30 Tex. Admin. Code §§ 101.201(b) and 122.143(4), FOP No. O2327, GTC and STC No. 2.F., and Tex. Health & Safety Code § 382.085(b). Specifically, the final record for the non-reportable emissions event that occurred from December 10, 2017 to March 8, 2018 was not created by March 22, 2018, the final record for the non-reportable emissions event that occurred from April 16, 2018 to April 20, 2018 was not created by May 4, 2018, and the final record for the non-reportable emissions event that occurred from November 14, 2018 to November 28, 2018 was not created by December 12, 2018.
- g. Failed to report all instances of deviations, in violation of 30 Tex. Admin. Code §§ 122.143(4) and 122.145(2)(A), FOP No. O2327, GTC, and Tex. Health & Safety Code § 382.085(b). Specifically, the deviation report for the October 1, 2017 through March 31, 2018 reporting period did not include the deviation for failing to create the final record for a non-reportable emissions event no later than two weeks after the end of the emissions event.

- h. Failed to report all instances of deviations, in violation of 30 Tex. Admin. Code §§ 122.143(4) and 122.145(2)(A), FOP No. O2327, GTC, and Tex. Health & Safety Code § 382.085(b). Specifically, the deviation report for the April 1, 2018 through September 30, 2018 reporting period did not include the deviation for failing to create the final record for a non-reportable emissions event no later than two weeks after the end of an emissions event.
- i. Failed to report all instances of deviations, in violation of 30 Tex. Admin. Code §§ 122.143(4) and 122.145(2)(A), FOP No. O2327, GTC, and Tex. Health & Safety Code § 382.085(b). Specifically, the deviation report for the October 1, 2018 through March 31, 2019 reporting period did not include the deviation for failing to create the final record for a non-reportable emissions event no later than two weeks after the end of the emissions event.
- 7. During a record review for the Plant conducted from June 4, 2020 through June 18, 2020, an investigator documented that 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. 95 and PSDTX854M2, SC No. 2, FOP No. O2327, GTC and STC No. 26, and Tex. Health & Safety Code § 382.085(b). Specifically, the Respondent released 7,575.10 lbs of CO, 1,486.37 lbs of NOx, and 6,622.43 lbs of VOC from the No. 1 Olefins Flare, EPN DM-1101, during an emissions event (Incident No. 334381) that occurred on April 22, 2020 and lasted seven hours.
- 8. During a record review for the Plant conducted from October 16, 2020 through October 30, 2020, an investigator documented that 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. 95 and PSDTX854M2, SC No. 2, FOP No. 02327, GTC and STC No. 26, and Tex. Health & Safety Code § 382.085(b). Specifically, the Respondent released 2,070.60 lbs of CO, 406.19 lbs of NOx, and 2,916.80 lbs of VOC from the No. 2 Olefins Flare, EPN DDM-3101, and released 880.50 lbs of VOC as fugitive emissions, during an emissions event (Incident No. 341971) that occurred on September 9, 2020 and lasted five hours and 20 minutes.
- 9. During a record review for the Plant conducted from October 23, 2020 through November 17, 2020, an investigator documented that the Respondent:
 - a. Failed to submit a copy of the testing and sampling reports within 60 days after the completion of the testing and sampling, in violation of 30 Tex. Admin. Code §§ 101.20(3), 116.115(c), 117.345(c), and 122.143(4), NSR Permit Nos. 123117, PSDTX1460, and GHGPSDTX135, SC No. 20.H., FOP No. O3966, GTC and STC Nos. 1.A. and 7, and Tex. Health & Safety Code § 382.085(b). Specifically, the copy of the performance test for Turbine 1 was required to be submitted by April 14, 2020, but was not submitted until April 28, 2020; the copy of the performance test for Turbine 2 was required to be submitted by April 16, 2020, but was not submitted until April 28, 2020; the copy of the performance test for Boiler 2 was required to be submitted by April 20, 2020, but was not submitted until April 28, 2020; and the copy of the performance test for the Dew Point Heater was required to be submitted by April 27, 2020, but was not submitted until April 28, 2020.
 - b. Failed to comply with the MAER, in violation of 30 Tex. ADMIN. CODE §§ 101.20(3), 116.115(b)(2)(F) and (c), and 122.143(4), NSR Permit Nos. 123117, PSDTX1460,

and GHGPSDTX135, SC No. 1, FOP No. O3966, GTC and STC No. 7, and Tex. Health & Safety Code § 382.085(b). Specifically, during a stack test completed on February 14, 2020, the Respondent exceeded the sulfur dioxide ("SO2") MAER of 0.07 lb/hr by 0.052 lb/hr for Turbine 1, EPN Turbine 1, resulting in approximately 686.40 lbs of unauthorized SO2 emissions.

- c. Failed to comply with the MAER, in violation of 30 Tex. Admin. Code §§ 101.20(3), 116.115(b)(2)(F) and (c), and 122.143(4), NSR Permit Nos. 123117, PSDTX1460, and GHGPSDTX135, SC No. 1, FOP No. O3966, GTC and STC No. 7, and Tex. Health & Safety Code § 382.085(b). Specifically, during a stack test completed on February 16, 2020, the Respondent exceeded the SO2 MAER of 0.07 lb/hr by 0.038 lb/hr for Turbine 2, EPN Turbine 2, resulting in approximately 499.78 lbs of unauthorized SO2 emissions.
- d. Failed to comply with the MAER, in violation of 30 Tex. Admin. Code §§ 101.20(3), 116.115(b)(2)(F) and (c), and 122.143(4), NSR Permit Nos. 123117, PSDTX1460, and GHGPSDTX135, SC No. 1, FOP No. O3966, GTC and STC No. 7, and Tex. Health & Safety Code § 382.085(b). Specifically, during a stack test completed on February 20, 2020, the Respondent exceeded the SO2 MAER of 0.05 lb/hr by 0.003 lb/hr for Boiler 2, EPN BLR2, resulting in approximately 39.17 lbs of unauthorized SO2 emissions.
- e. Failed to comply with the MAER, in violation of 30 Tex. Admin. Code §§ 101.20(3), 116.115(b)(2)(F) and (c), and 122.143(4), NSR Permit Nos. 123117, PSDTX1460, and GHGPSDTX135, SC No. 1, FOP No. O3966, GTC and STC No. 7, and Tex. Health & Safety Code § 382.085(b). Specifically, during a stack test completed on February 29, 2020, the Respondent exceeded the PM MAER of 1.95 lbs/hr by 0.46 lb/hr for Boiler 1, EPN BLR1, resulting in approximately 839.04 lbs of unauthorized PM emissions.
- f. Failed to comply with the MAER, in violation of 30 Tex. Admin. Code §§ 101.20(3), 116.115(b)(2)(F) and (c), and 122.143(4), NSR Permit Nos. 123117, PSDTX1460, and GHGPSDTX135, SC No. 1, FOP No. O3966, GTC and STC No. 7, and Tex. Health & Safety Code § 382.085(b). Specifically, during a stack test completed on February 20, 2020, the Respondent exceeded the PM MAER of 1.95 lbs/hr by 8.26 lbs/hr for Boiler 2, EPN BLR2, resulting in approximately 17,643.36 lbs of unauthorized PM emissions.
- g. Failed to comply with the concentration limit, in violation of 30 Tex. Admin. Code §§ 101.20(3), 116.115(c), 117.310(c)(2), and 122.143(4), NSR Permit Nos. 123117, PSDTX1460, and GHGPSDTX135, SC No. 7, FOP No. O3966, GTC and STC Nos. 1.A. and 7, and Tex. Health & Safety Code § 382.085(b). Specifically, during a stack test completed on February 29, 2020, the Respondent exceeded the NH3 concentration limit of 10 ppmvd corrected to 3.0% O2 by 2.25 ppmvd for Boiler 3, EPN BLR3.
- h. Failed to maintain and operate a totalizing fuel flow meter to individually and continuously measure the gas and liquid fuel usage, in violation of 30 Tex. Admin. Code §§ 117.340(a) and 122.143(4), FOP No. O3966, GTC and STC No. 1.A., and Tex. Health & Safety Code § 382.085(b). Specifically, during the stack test conducted from February 26, 2020 to February 27, 2020, the fuel flow meter for the Dew Point Heater was not operational.

- i. Failed to comply with the MAER, in violation of 30 Tex. Admin. Code §§ 101.20(3), 116.115(b)(2)(F) and (c), and 122.143(4), NSR Permit Nos. 123117, PSDTX1460, and GHGPSDTX135, SC No. 1, FOP No. O3966, GTC and STC No. 7, and Tex. HEALTH & SAFETY CODE § 382.085(b). Specifically, during a stack test completed on February 20, 2020, the Respondent exceeded the SO2 MAER of 0.05 lb/hr by 0.0027 lb/hr for Boiler 3, EPN BLR3, resulting in approximately 34.67 lbs of unauthorized SO2 emissions.
- 10. During a record review for the Plant conducted on November 2, 2020, an investigator documented that the Respondent:
 - a. 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. 95 and PSDTX854M2, SC No. 2, FOP No. O2327, GTC and STC No. 26, and Tex. Health & Safety Code § 382.085(b). Specifically, the Respondent released 110.37 lbs of VOC as fugitive emissions, during an emissions event (Incident No. 342492) that occurred on September 18, 2020 and lasted eight hours.
 - b. Failed to identify all required information on the final record for a reportable emissions event, in violation of 30 Tex. Admin. Code §§ 101.201(b)(1)(G) and 122.143(4), FOP No. O2327, GTC and STC No. 2.F., and Tex. Health & Safety Code § 382.085(b). Specifically, the Respondent did not identify all of the compounds released from the EPNs involved during the shutdown of the Butadiene Unit on the final record for Incident No. 342492.
- 11. During a record review for the Plant conducted from November 5, 2020 through November 19, 2020, an investigator documented that 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. 95 and PSDTX854M2, SC No. 2, FOP No. 02327, GTC and STC No. 26, and Tex. Health & Safety Code § 382.085(b). Specifically, the Respondent released 77,184.97 lbs of CO, 15,145.54 lbs of NOx, and 78,003.59 lbs of VOC from the No. 2 Olefins Flare, EPN DDM-3101, during an emissions event (Incident No. 344750) that began on October 24, 2020 and lasted 59 hours.
- During a record review for the Plant conducted from November 30, 2020 through December 1, 2020, an investigator documented that the Respondent failed to comply with the MAERs, in violation of 30 Tex. Admin. Code §§ 101.20(3), 116.115(b)(2)(F) and (c), and 122.143(4), NSR Permit Nos. 95 and PSDTX854M2, SC No. 2, FOP No. 02327, GTC and STC No. 26, and Tex. Health & Safety Code § 382.085(b). Specifically, the Respondent exceeded the ethylene MAER of 78.75 tpy based on a 12-month rolling period, exceeded the CO MAER of 156.36 tpy based on a 12-month rolling period, and exceeded the NOx MAER of 30.68 tpy based on a 12-month rolling period for the 12-month period ending on September 2020 for the Olefins 2 Flare Routine Startup, Shutdown and Maintenance Emissions, EPN DDM-3101MSS, resulting in 11.21 tons of unauthorized ethylene emissions, 27.42 tons of unauthorized CO emissions, and 5.38 tons of unauthorized NOx emissions.
- During a record review for the Plant conducted from December 21, 2020 through April 16, 2021, an investigator documented that the Respondent:
 - a. Failed to maintain the net heating value of the gas being combusted at 300 Btu/scf or greater if the flare is steam-assisted or air-assisted, in violation of 30

TEX. ADMIN. CODE §§ 101.20(1), (2), and (3), 113.100, 116.115(c), and 122.143(4), 40 CFR §§ 60.18(c)(3)(ii) and 63.11(b)(6)(ii), NSR Permit Nos. 95 and PSDTX854M2, SC No. 7.A., FOP No. O2327, GTC and STC Nos. 1.A and 26, and TEX. HEALTH & SAFETY CODE § 382.085(b). Specifically, the net heating value of the gas being combusted by the No. 1 Olefins Facilities Flare was less than 300 Btu/scf when the net heating value ranged from 0.00 Btu/scf to 299.77 Btu/scf for a total of 3,357 hours on 301 days from October 1, 2019 to September 30, 2020.

- b. Failed to comply with the operating parameter limit, in violation of 30 Tex. ADMIN. CODE §§ 115.725(a)(2)(D) and 122.143(4), FOP No. O2327, GTC and STC No. 1.A., and Tex. Health & Safety Code § 382.085(b). Specifically, the Respondent did not maintain the established operating parameter limit of at least 2.6% O2 level when the oxygen level ranged from 0.00% to 2.598% for a total of 677 hours on 49 days from October 1, 2019 to January 12, 2020 for the No. 1 Olefins Boiler.
- c. Failed to comply with the concentration limit, in violation of 30 Tex. Admin. Code §§ 116.115(c), 117.310(c)(2)(B), and 122.143(4), NSR Permit No. 97769, SC No. 5.F., FOP No. O2327, GTC and STC Nos. 1.A. and 26, and Tex. Health & Safety Code § 382.085(b). Specifically, the Respondent exceeded the NH3 concentration limit of 10 ppmvd corrected to 3.0% O2 based on a rolling 24-hour averaging period by a range from 0.75 ppmvd to 144.99 ppmvd for a total of 14 hours on October 16, 2019 and April 11, 2020 for Furnace No. 105.
- d. Failed to comply with the concentration limit, in violation of 30 Tex. Admin. Code §§ 116.115(c) and 122.143(4), NSR Permit No. 97769, SC No. 5.F., FOP No. 02327, GTC and STC No. 26, and Tex. Health & Safety Code § 382.085(b). Specifically, the Respondent exceeded the NH3 slip concentration limit of 20 ppmvd corrected to 3% O2 on an hourly basis by a range from 3.18 ppmvd to 1,206.66 ppmvd for a total of 15 hours on five days from October 15, 2019 to August 22, 2020 for Furnace No. 105.
- e. Failed to comply with the firing rate limit, in violation of 30 Tex. Admin. Code §§ 116.115(c) and 122.143(4), NSR Permit No. 101, SC No. 3.B.(3), FOP No. 02327, GTC and STC No. 26, and Tex. Health & Safety Code § 382.085(b). Specifically, the Respondent exceeded the firing rate limit of 388 million British thermal units per hour ("MMBtu/hr") by a range from 0.06 MMBtu/hr to 28.35 MMBtu/hr for a total of 227 hours on 13 days from October 1, 2019 to April 19, 2020 for the No. 2 Olefins Unit Steam Boiler.
- f. Failed to comply with the concentration limit, in violation of 30 Tex. Admin. Code §§ 117.310(c)(2) and 122.143(4), FOP No. O2327, GTC and STC No. 1.A., and Tex. Health & Safety Code § 382.085(b). Specifically, the Respondent exceeded the NH3 concentration limit of 10 ppmvd corrected at 3.0% O2 by a range from 5.23 ppmvd to 262.37 ppmvd for a total of seven hours on August 27, 2020 and August 29, 2020 for the Steam Cracking Furnace.
- g. Failed to comply with the MAER, in violation of 30 Tex. Admin. Code §§ 101.20(3), 116.115(b)(2)(F) and (c), and 122.143(4), NSR Permit Nos. 95 and PSDTX854M2, SC No. 2, FOP No. O2327, GTC and STC No. 26, and Tex. Health & Safety Code § 382.085(b). Specifically, the Respondent exceeded the VOC MAER of 87.50 tpy based on a 12-month rolling period for the 12-month periods ending from

- August 2020 through September 2020 for the Olefins 1 and 2 Flare, EPN FLAREMSSCAP, resulting in 50.94 tons of unauthorized VOC emissions.
- h. Failed to submit an application for a revision to an FOP at a site to change, add, or remove one or more permit terms and conditions, in violation of 30 Tex. ADMIN. CODE § 122.210(a) and Tex. Health & Safety Code § 382.085(b). Specifically, the Respondent did not submit an application to revise FOP No. O2327 to incorporate the applicable regulatory requirements for Stationary Reciprocating Internal Combustion Engines UTILCMP3, UTILCMP4, UTILCMP6, OLE2COMP2, and DCPCOMP2.
- 14. During a record review for the Plant conducted from March 31, 2021 through August 17, 2021, an investigator documented that the Respondent:
 - a. Failed to comply with the concentration limits, in violation of 30 Tex. Admin. Code §§ 101.20(3), 116.115(c), 117.310(c)(2)(A), and 122.143(4), NSR Permit Nos. 123117, PSDTX1460, and GHGPSDTX135, SC No. 5, FOP No. O3966, GTC and STC Nos. 1.A. and 7, and Tex. Health & Safety Code § 382.085(b). Specifically, the Respondent exceeded the CO concentration limit of 4.0 ppmvd corrected to 15% O2 by a range from 0.001 ppmvd to 72.25 ppmvd for a total of 1,178 hours on 99 days from January 15, 2020 to September 30, 2020, exceeded the NOx concentration limit of 2.0 ppmvd at 15% O2 by a range from 0.0003 ppmvd to 556.78 ppmvd for a total of 412 hours on 40 days from January 15, 2020 to July 8, 2020, exceeded the NH3 concentration limit of 7.0 ppmvd at 15% O2 by a range from 0.001 ppmvd to 3.18 ppmvd for a total of 23 hours on seven days from January 29, 2020 to August 18, 2020, and exceeded the NH3 concentration limit of 10.0 ppmvd at 15% O2 by 0.18 ppmvd for one hour on January 9, 2020 for Turbine 1.
 - b. Failed to comply with the concentration limits, in violation of 30 Tex. Admin. Code §§ 101.20(3), 116.115(c), 117.310(c)(2)(A), and 122.143(4), NSR Permit Nos. 123117, PSDTX1460, and GHGPSDTX135, SC No. 5, FOP No. O3966, GTC and STC Nos. 1.A. and 7, and Tex. Health & Safety Code § 382.085(b). Specifically, the Respondent exceeded the CO concentration limit of 4.0 ppmvd at 15% O2 by a range from 0.001 ppmvd to 37.44 ppmvd for a total of 2,760 hours on 153 days from January 15, 2020 to September 30, 2020, exceeded the NOx concentration limit of 2.0 ppmvd at 15% O2 by a range from 0.0001 ppmvd to 83.68 ppmvd for a total of 144 hours on 26 days from January 14, 2020 to August 27, 2020, exceeded the NH3 concentration limit of 7.0 ppmvd at 15% O2 by a range from 0.56 ppmvd to 14.23 ppmvd for a total of 25 hours on seven days from March 21, 2020 to June 27, 2020, and exceeded the NH3 concentration limit of 10.0 ppmvd at 15% O2 by a range from 2.66 ppmvd to 11.23 ppmvd for a total of 19 hours on five days from March 27, 2020 to June 27, 2020 for Turbine 2.
 - c. Failed to comply with the MAERs, in violation of 30 Tex. Admin. Code §§ 101.20(3), 116.115(b)(2)(F) and (c), and 122.143(4), NSR Permit Nos. 123117, PSDTX1460, and GHGPSDTX135, SC No. 1, FOP No. O3966, GTC and STC No. 7, and Tex. Health & Safety Code § 382.085(b). Specifically, the Respondent exceeded the CO MAER of 6.60 lbs/hr by a range from 0.03 lb/hr to 36.75 lbs/hr for a total of 220 hours on 35 days from February 1, 2020 to September 30, 2020 and exceeded the NOx MAER of 5.42 lbs/hr by a range from 0.09 lb/hr to 29.42 lbs/hr for a total of 85 hours on 23 days from from January 29, 2020 to

- September 3, 2020 for Turbine 1, EPN Turbine 1, resulting in the unauthorized release of 850.73 lbs of CO emissions and 600.11 lbs of NOx emissions.
- d. Failed to comply with the MAERs, in violation of 30 Tex. ADMIN. CODE §§ 101.20(3), 116.115(b)(2)(F) and (c), and 122.143(4), NSR Permit Nos. 123117, PSDTX1460, and GHGPSDTX135, SC No. 1, FOP No. O3966, GTC and STC No. 7, and Tex. Health & Safety Code § 382.085(b). Specifically, the Respondent exceeded the CO MAER of 6.60 lbs/hr by a range from 2.60 lbs/hr to 205.17 lbs/hr for a total of 1,558 hours on 93 days from January 30, 2020 to September 30, 2020, exceeded the NOx MAER of 5.42 lbs/hr by a range from 0.06 lb/hr to 111.53 lbs/hr for a total of 58 hours on 11 days from January 30, 2020 to July 7, 2020, exceeded the NH3 MAER of 7.01 lbs/hr by a range from 0.76 lb/hr to 14.09 lbs/hr for a total of three hours on three days from April 18, 2020 to May 25, 2020, and exceeded the VOC MAER of 0.68 lb/hr by a range from 0.0001 lb/hr to 0.05 lb/hr for a total of 50 hours from February 15, 2020 to March 29, 2020 for Turbine 2, EPN Turbine 2, resulting in the unauthorized release of 9,819.14 lbs of CO emissions, 1,695.43 lbs of NOx emissions, 16.47 lbs of NH3 emissions, and 1.50 lbs of VOC emissions.
- e. Failed to comply with the emissions and concentration limits, in violation of 30 Tex. Admin. Code §§ 101.20(3), 116.115(c), 117.310(c)(2)(B), and 122.143(4), NSR Permit Nos. 123117, PSDTX1460, and GHGPSDTX135, SC No. 7, FOP No. O3966, GTC and STC Nos. 1.A. and 7, and Tex. Health & Safety Code § 382.085(b). Specifically, the Respondent exceeded the CO concentration limit of 50 ppmvd at 3% O2 by a range from 1.99 ppmvd to 139.43 ppmvd for a total of 15 hours on four days from February 24, 2020 to March 29, 2020, exceeded the NOx emissions limit of 0.01 lb/MMBtu by a range from 0.005 lb/MMBtu to 0.08 lb/MMBtu for a total of 171 hours on 19 days from February 20, 2020 to September 11, 2020, and exceeded the NH3 concentration limit of 10.0 ppmvd at 3% O2 based on a rolling 24-hour averaging period by a range from 0.05 ppmvd to 64.57 ppmvd for a total of 558 hours on 29 days from February 23, 2020 to September 16, 2020 for Boiler 1.
- f. Failed to comply with the emissions and concentration limits, in violation of 30 Tex. Admin. Code §§ 101.20(3), 116.115(c), 117.310(c)(2)(B), and 122.143(4), NSR Permit Nos. 123117, PSDTX1460, and GHGPSDTX135, SC No. 4, FOP No. O3966, GTC and STC Nos. 1.A. and 7, and Tex. Health & Safety Code § 382.085(b). Specifically, the Respondent exceeded the NOx emissions limit of 0.01 lb/MMBtu by a range from 0.01 lb/MMBtu to 0.09 lb/MMBtu for a total of 391 hours on 34 days from February 4, 2020 to September 22, 2020 and exceeded the NH3 concentration limit of 10.0 ppmvd at 3% O2 based on a rolling 24-hour averaging period by a range from 0.05 ppmvd to 0.42 ppmvd for a total on 21 hours on July 3, 2020 and July 4, 2020 for Boiler 2.
- g. Failed to comply with the emissions and concentration limits, in violation of 30 Tex. Admin. Code §§ 101.20(3), 116.115(c), 117.310(c)(2)(B), and 122.143(4), NSR Permit Nos. 123117, PSDTX1460, and GHGPSDTX135, SC No. 7, FOP No. O3966, GTC and STC Nos. 1.A. and 7, and Tex. Health & Safety Code § 382.085(b). Specifically, the Respondent exceeded the CO concentration limit of 50 ppmvd at 3% O2 by a range from 0.23 ppmvd to 299.04 ppmvd for a total of 115 hours on 13 days from January 6, 2020 to April 19, 2020, exceeded the NOx emissions limit of 0.01 lb/MMBtu by a range from 0.005 lb/MMBtu to 0.19 lb/MMBtu for a total of 616 hours on 36 days from January 6, 2020 to September 16, 2020, and

exceeded the NH3 concentration limit of 10.0 ppmvd at 3% O2 based on a rolling 24-hour averaging period by a range from 0.05 ppmvd to 28.67 ppmvd for a total of 741 hours on 48 days from January 20, 2020 to September 30, 2020 for Boiler 3.

- h. Failed to comply with MAERs, in violation of 30 Tex. ADMIN. Code §§ 101.20(3), 116.115(b)(2)(F) and (c), and 122.143(4), NSR Permit Nos. 123117, PSDTX1460, and GHGPSDTX135, SC No. 1, FOP No. O3966, GTC and STC No. 7, and Tex. HEALTH & SAFETY CODE § 382.085(b). Specifically, the Respondent exceeded the CO MAER of 15.22 lbs/hr by a range from 1.49 lb/hr to 15.39 lbs/hr for a total of five hours on February 24, 2020 and March 3, 2020, exceeded the NOx MAER of 4.17 lbs/hr by a range from 0.01 lb/hr to 10.00 lbs/hr for a total of 87 hours on 16 days from February 25, 2020 to September 11, 2020, exceeded the NH3 MAER of 1.85 lbs/hr by a range from 0.01 lb/hr to 29.00 lbs/hr for a total of 206 hours on 16 days from February 23, 2020 to April 19, 2020, and exceeded the SO2 MAER of 0.05 lb/hr by a range from 0.00001 lb/hr to 0.01 lb/hr for a total of six hours on February 23, 2020 and February 24, 2020 for Boiler 1, EPN BLR1, resulting in the unauthorized release of 34.01 lbs of CO emissions, 407.69 lbs of NOx emissions, 533.00 lbs of NH3, and 0.06 lb of SO2 emissions.
- i. Failed to comply with the MAERs, in violation of 30 Tex. Admin. Code §§ 101.20(3), 116.115(b)(2)(F) and (c), and 122.143(4), NSR Permit Nos. 123117, PSDTX1460, and GHGPSDTX135, SC No. 1, FOP No. O3966, GTC and STC No. 7, and Tex. Health & Safety Code § 382.085(b). Specifically, the Respondent exceeded the CO MAER of 15.22 lbs/hr by a range from 0.11 lb/hr to 2.88 lbs/hr for a total of 12 hours on April 16, 2020 and April 19, 2020, exceeded the NOx MAER of 4.17 lbs/hr by a range from 0.01 lb/hr to 11.11 lbs/hr for a total of 226 hours on 32 days from January 6, 2020 to September 16, 2020, and exceeded the PM MAER of 1.95 lbs/hr by a range from 0.01 lb/hr to 0.47 lb/hr for a total of 19 hours from January 22, 2020 to March 24, 2020 for Boiler 3, EPN BLR3, resulting in the unauthorized release of 11.15 lbs of CO emissions, 340.17 lbs of NOx emissions, and 4.37 lbs of PM emissions.
- During a record review for the Plant conducted from April 5, 2021 through June 23, 2021, an investigator documented that 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. 95 and PSDTX854M2, SC No. 2, FOP No. O2327, GTC and STC No. 26, and Tex. Health & Safety Code § 382.085(b). Specifically, the Respondent released 6,805.61 lbs of CO and 1,348.23 lbs of NOx from the No. 1 Olefins Flare, EPN DM-1101, during an emissions event (Incident No. 352585) that began on March 12, 2021 and lasted 27 hours.
- 16. During a record review for the Plant conducted from April 27, 2021 through May 4, 2021, an investigator documented that 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. 95 and PSDTX854M2, SC No. 2, FOP No. O2327, GTC and STC No. 26, and Tex. Health & Safety Code § 382.085(b). Specifically, the Respondent released 1,996.98 lbs of CO, 391.84 lbs of NOx, and 2,823.11 lbs of VOC from the No. 2 Olefins Flare, EPN DDM-3101, during an emissions event (Incident No. 285534) that occurred on June 2, 2018 and lasted two hours.

- 17. During a record review for the Plant conducted from April 30, 2021 through May 14, 2021, an investigator documented that 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. 95 and PSDTX854M2, SC No. 2, FOP No. O2327, GTC and STC No. 26, and Tex. Health & Safety Code § 382.085(b). Specifically, the Respondent released 66,227.61 lbs of CO, 13,065.88 lbs of NOx, and 39,464.64 lbs of VOC from the No. 2 Olefins Flare, EPN DDM-3101, during an emissions event (Incident No. 354056) that began on April 12, 2021 and lasted 155 hours.
- 18. During a record review for the Plant conducted on May 13, 2021, an investigator documented that the Respondent:
 - a. 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. 95 and PSDTX854M2, SC No. 2, FOP No. O2327, GTC and STC No. 26, and Tex. Health & Safety Code § 382.085(b). Specifically, the Respondent released 479.27 lbs of CO, 94.02 lbs of NOx, and 547.15 lbs of VOC from the No. 1 Olefins Flare, EPN DM-1101, during an emissions event (Incident No. 291225) that occurred on August 28, 2018 and lasted one hour.
 - b. 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. 95 and PSDTX854M2, SC No. 2, FOP No. O2327, GTC and STC No. 26, and Tex. Health & Safety Code § 382.085(b). Specifically, the Respondent released 563.86 lbs of VOC as fugitive emissions, during an emissions event (Incident No. 293328) that began on September 29, 2018 and lasted 13 hours.
 - c. 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. 95 and PSDTX854M2, SC No. 2, FOP No. O2327, GTC and STC No. 26, and Tex. Health & Safety Code § 382.085(b). Specifically, the Respondent released 353.30 lbs of VOC as fugitive emissions, during an emissions event (Incident No. 297512) that occurred on November 19, 2018 and lasted nine hours.
- 19. During a record review for the Plant conducted from June 30, 2021 through July 12, 2021, an investigator documented that 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. 95 and PSDTX854M2, SC No. 2, FOP No. O2327, GTC and STC No. 26, and Tex. Health & Safety Code § 382.085(b). Specifically, the Respondent released 198.90 lbs of ethylene as fugitive emissions, during an emissions event (Incident No. 340661) that began on August 13, 2020 and lasted two hours and 33 minutes.
- 20. During a record review for the Plant conducted from June 30, 2021 through July 12, 2021, an investigator documented that 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. 95 and PSDTX854M2, SC No. 2, FOP No. O2327, GTC and STC No. 26, and Tex. Health & Safety Code § 382.085(b). Specifically, the Respondent released 12,425.00 lbs of VOC as fugitive emissions, during an emissions event (Incident No. 340681) that occurred on August 15, 2020 and lasted 30 minutes.
- 21. During a record review for the Plant conducted from June 30, 2021 through July 14, 2021, an investigator documented that 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. 95 and PSDTX854M2, SC No. 2, FOP No. O2327, GTC and STC No. 26, and Tex. Health & Safety Code § 382.085(b). Specifically, the Respondent released 8,413.27 lbs of CO, 1,657.64 of NOx, and 4,115.85 lbs of VOC from the No. 1 Olefins Flare, EPN DM-1101, during an emissions event (Incident No. 332637) that began on March 23, 2020 and lasted 14 hours.

- 22. During a record review for the Plant conducted from June 30, 2021 through July 14, 2021, an investigator documented that 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. 95 and PSDTX854M2, SC No. 2, FOP No. O2327, GTC and STC No. 26, and Tex. Health & Safety Code § 382.085(b). Specifically, the Respondent released 11,713.24 lbs of CO, 2,302.91 lbs of NOx, and 12,270.70 lbs of VOC from the No. 1 Olefins Flare, EPN DM-1101, during an emissions event (Incident No. 333191) that occurred on April 1, 2020 and lasted nine hours.
- 23. During a record review for the Plant conducted from June 30, 2021 through July 14, 2021, an investigator documented that 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. 95 and PSDTX854M2, SC No. 2, FOP No. O2327, GTC and STC No. 26, and Tex. Health & Safety Code § 382.085(b). Specifically, the Respondent released 825.00 lbs of ethylene as fugitive emissions, during an emissions event (Incident No. 324083) that occurred on November 4, 2019 and lasted 12 minutes.
- 24. During a record review for the Plant conducted from June 30, 2021 through July 14, 2021, an investigator documented that 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. 95 and PSDTX854M2, SC No. 2, FOP No. O2327, GTC and STC No. 26, and Tex. Health & Safety Code § 382.085(b). Specifically, the Respondent released 602.11 lbs of CO, 118.10 lbs of NOx, and 945.82 lbs of VOC from the No. 1 Olefins Flare, EPN DM-1101, during an emissions event (Incident No. 339521) that occurred on July 24, 2020 and lasted 50 minutes.
- 25. During a record review for the Plant conducted on July 20, 2021, an investigator documented that 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. 95 and PSDTX854M2, SC No. 2, FOP No. O2327, GTC and STC No. 26, and Tex. Health & Safety Code § 382.085(b). Specifically, the Respondent released 4,009.92 lbs of CO, 786.81 lbs of NOx, and 3,749.71 lbs of VOC from the No. 2 Olefins Flare, EPN DDM-3101, during an emissions event (Incident No. 296381) that began on November 4, 2018 and lasted four hours.
- 26. During a record review for the Plant conducted on July 21, 2021, an investigator documented that 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. 95 and PSDTX854M2, SC No. 2, FOP No. O2327, GTC and STC No. 26, and Tex. Health & Safety Code § 382.085(b). Specifically, the Respondent released 2,753.07 lbs of CO, 540.13 lbs of NOx, and 3,304.23 lbs of VOC from the No. 2 Olefins Flare, EPN DDM-3101, and released 1,055.68 lbs of CO, 207.08 lbs of NOx, and 1,152.79 lbs of VOC from the No. 1 Olefins Flare, EPN DM-1101, during an emissions event (Incident No. 291947) that occurred on September 11, 2018 and lasted six hours.

- 27. During a record review for the Plant conducted from August 12, 2021 through September 29, 2021, an investigator documented that 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. 123117, PSDTX1460, and GHGPSDTX135, SC No. 1, FOP No. O3966, GTC and STC No. 7, and Tex. Health & Safety Code § 382.085(b). Specifically, the Respondent released 250.05 lbs of CO, 641.20 lbs of NOx, 23.22 lbs of VOC, 22.09 lbs of NH3, 89.30 lbs of PM, and 0.89 lb of SO2 from Turbine 1, EPN Turbine 1, during an emissions event (Incident No. 333379) that began on April 4, 2020 and lasted 32 hours.
- 28. During a record review for the Plant conducted from August 23, 2021 through September 7, 2021, an investigator documented that 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. 95 and PSDTX854M2, SC No. 2, FOP No. O2327, GTC and STC No. 26, and Tex. Health & Safety Code § 382.085(b). Specifically, the Respondent released 31.00 lbs of VOC as fugitive emissions and released 8,433.31 lbs of CO, 1,667.25 lbs of NOx, and 5,804.05 lbs of VOC from the No. 2 Olefins Flare, EPN DDM-3101, during an emissions event (Incident No. 364479) that began on August 9, 2021 and lasted 26 hours and 10 minutes.

III. DENIALS

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

IV. ORDERING PROVISIONS

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

1. The Respondent is assessed a penalty as set forth in Section I, Paragraph No. 4. The payment of this penalty and the Respondent's compliance with all of the requirements set forth in this Order resolve only the allegations in Section II. The Commission shall not be constrained in any manner from requiring corrective action or penalties for violations which are not raised here. Penalty payments shall be made payable to "TCEQ" and shall be sent with the notation "Re: INEOS USA LLC, Docket No. 2021-0818-AIR-E" to:

Financial Administration Division, Revenue Operations Section Attention: Cashier's Office, MC 214 Texas Commission on Environmental Quality 12100 Park 35 Circle Austin, Texas 78753

- 2. The Respondent shall implement and complete the SEP as set forth in Section I, Paragraph No. 4. The amount of \$898,692 of the assessed penalty is conditionally offset based on the Respondent's implementation and completion of the SEP pursuant to the terms of the SEP Agreement, as defined in Attachment A. Penalty payments for any portion of the SEP deemed by the Executive Director as not complete shall be paid within 30 days after the date the Executive Director demands payment.
- 3. The Respondent shall undertake the following technical requirements at the Plant:
 - a. Within 30 days after the effective date of this Order:

- i. Submit revised deviation reports for the October 1, 2014 through March 31, 2015 and April 1, 2015 through September 30, 2015 reporting periods to report the deviation for failing to submit an application to revise FOP No. O2327 to include 40 CFR Part 60 Subpart VV as the applicable requirements for the No. 1 Olefins Unit Fugitives and No. 2 Olefins Unit Fugitives;
- ii. Submit the 40 CFR Part 63 Subpart ZZZZ compliance reports for the January 1, 2013 through June 30, 2013, July 1, 2013 through December 31, 2013, January 1, 2014 through June 30, 2014, July 1, 2014 through December 31, 2014, January 1, 2015 through June 30, 2015, July 1, 2015 through December 31, 2015, January 1, 2016 through June 30, 2016 reporting periods for Firewater Pump AG-203B and Level Control Pump AG-2705D;
- iii. Begin maintaining the records containing sufficient information to demonstrate compliance for each PBR and standard exemption listed in the NSR Authorization Table of FOP No. O2327 and make the records available in a reviewable format at the request of personnel from the Commission; and
- iv. Submit revised deviation reports for the October 1, 2015 through March 31, 2016 and April 1, 2016 through September 30, 2016 reporting periods to report the deviations for failing to obtain a revision for FOP No. O2327 prior to operating emission units at the site; failing to submit an application for a revision to FOP No. O2327 for those activities at a site which change, add, or remove one or more permit terms or conditions; and failing to submit the 40 CFR Part 63 Subpart ZZZZ compliance reports.
- b. Within 45 days after the effective date of this Order, submit written certification demonstrating compliance with Ordering Provision No. 3.a., as described in Ordering Provision No. 3.f.
- c. Within 180 days after the effective date of this Order, develop a boiler selective catalytic reduction ("SCR") catalyst demonstration project designed to control NOx and NH3 emissions and install a new SCR catalyst on either Boiler 1, 2 or 3.
- d. Within 180 days after installation of the SCR system on the boiler selected in Ordering Provision 3.c, determine the effectiveness of the new SCR catalyst based on the NH3 concentration. If the SCR catalyst demonstration project is achieving NOx and NH3 emissions control, purchase two additional SCR systems for installation on the remaining two boilers. If the SCR catalyst demonstration project does not achieve NOx and NH3 emissions control on the selected boiler, submit written certification of the results within 120 operation days, as described in Ordering Provision No. 3.f.
- e. Within 180 days after receiving the SCR systems, install the new SCR system on the remaining two boilers.
- f. Within 120 operation days after installation of the new SCR system on the two remaining boilers, submit written certification demonstrating that the control of NOx and NH3 emissions for Boilers 1, 2 or 3 has been achieved, and include

detailed supporting documentation including photographs, receipts, and/or other records to demonstrate compliance. The certification shall be signed by the Respondent and shall include the following certification language:

"I certify under penalty of law that I have personally examined and am familiar with the information submitted and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fines and imprisonment for knowing violations."

The certification shall be submitted to:

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

with a copy to:

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

- 4. All relief not expressly granted in this Order is denied.
- 5. 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.
- 6. The Executive Director may grant an extension of any deadline in this Order or in any plan, report, or other document submitted pursuant to this Order, upon a written and substantiated showing of good cause. All requests for extensions by the Respondent shall be made in writing to the Executive Director. Extensions are not effective until the Respondent receives written approval from the Executive Director. The determination of what constitutes good cause rests solely with the Executive Director. Extension requests shall be sent to the Enforcement Division at the address listed above.
- 7. This Order, issued by the Commission, shall not be admissible against the Respondent in a civil proceeding, unless the proceeding is brought by the OAG to: (1) enforce the terms of this Order; or (2) pursue violations of a statute within the Commission's jurisdiction, or of a rule adopted or an order or permit issued by the Commission under such a statute.
- 8. This Order may be executed in separate and multiple counterparts, which together shall constitute a single instrument. Any page of this Order may be copied, scanned, digitized, converted to electronic portable document format ("pdf"), or otherwise reproduced and may be transmitted by digital or electronic transmission, including but

not limited to facsimile transmission and electronic mail. Any signature affixed to this Order shall constitute an original signature for all purposes and may be used, filed, substituted, or issued for any purpose for which an original signature could be used. The term "signature" shall include manual signatures and true and accurate reproductions of manual signatures created, executed, endorsed, adopted, or authorized by the person or persons to whom the signatures are attributable. Signatures may be copied or reproduced digitally, electronically, by photocopying, engraving, imprinting, lithographing, electronic mail, facsimile transmission, stamping, or any other means or process which the Executive Director deems acceptable. In this paragraph exclusively, the terms: electronic transmission, owner, person, writing, and written, shall have the meanings assigned to them under Tex. Bus. Org. Code § 1.002.

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

INEOS USA LLC DOCKET NO. 2021-0818-AIR-E Page 30

SIGNATURE PAGE

TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

For the Commission	Date
Kriote Mello-Jurach	07/30/2025
For the Executive Director	Date

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

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

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

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

Signature Date

Greg Blanchard Site Director

Name (Printed or typed)
Authorized Representative of

INEOS USA LLC

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

Attachment A

Docket Number: 2021-0818-AIR-E

SUPPLEMENTAL ENVIRONMENTAL PROJECT

Respondent:	INEOS USA LLC
Payable Penalty Amount:	\$1,797,385
SEP Offset Amount:	\$898,692
Type of SEP:	Contribution to a Third-Party Pre-Approved SEP
Third-Party Administrator:	Texas City Independent School District
Project Name:	TCISD Alternative Fuel School Bus Program
Location of SEP:	Texas Air Quality Control Region 216: Houston-Galveston

The Texas Commission on Environmental Quality ("TCEQ") agrees to offset a portion of the administrative penalty amount assessed in this Agreed Order for the Respondent to contribute to a Supplemental Environmental Project ("SEP"). The offset is equal to the SEP Offset Amount set forth above and is conditioned upon completion of the project in accordance with the terms of this Attachment A.

1. Project Description

a. Project

The Respondent shall contribute the SEP Offset Amount to the Third-Party Administrator named above. The contribution will be to the **Texas City Independent School District** for the *TCISD Alternative Fuel School Bus Program* project. The contribution will be used in accordance with the SEP between the Third-Party Administrator and the TCEQ (the "Project"). Specifically, the SEP Offset Amount will be used to purchase lower-emission propane fueled school buses that are model year 2010 or newer ("Replacement Bus(es)") to replace buses currently in the fleet that are model year 2006 or older ("Older Bus(es)"). The Older Buses will then be decommissioned, thus permanently removing them from the roads. The SEP Offset Amount shall only be used for the purchase of a base model propane fueled Replacement Bus. The Third-Party Administrator shall own and operate each Replacement Bus for at least five years following the date of purchase.

The Third-Party Administrator shall give preference to replacing the oldest, most polluting buses within its fleet. Only Older Buses that are currently in regular use, driven on a regular route on a weekly basis for at least the past two years are eligible for replacement.

The Third-Party Administrator shall ensure that each Replacement Bus purchased has an engine that meets the Environmental Protection Agency's 2010 emissions standards. Additionally, all Older Buses that are replaced shall be fully decommissioned as required in the SEP Vehicle Disposition Form. All funds received for the scrap value of the Older Bus shall be deposited into the SEP Account and become part of the SEP. The SEP will be done in accordance with all federal, state, and local environmental laws and regulations.

INEOS USA LLC Docket No. 2021-0818-AIR-E Agreed Order - Attachment A

All dollars contributed will be used solely for the direct cost of implementing the Project, including, but not limited to supplies, materials, and equipment. Any portion of this contribution that is not spent on the specifically identified SEP may, at the discretion of the Executive Director ("ED"), be applied to another pre-approved SEP.

The Respondent's signature affixed to this Agreed Order certifies that the Respondent has no prior commitment to make this contribution and that it is being contributed solely to settle this enforcement action. The Respondent shall not profit from this SEP.

b. Environmental Benefit

The Project will directly benefit air quality in Third-Party Administrator's region by reducing harmful exhaust emissions from older school buses by replacing them with lower-emission propane buses. Older school bus engines emit greater amounts of harmful pollutants such as nitrous oxides, particulate matter, volatile organic compounds, and carbon monoxide than newer, lower-emission buses. These pollutants contribute to the formation of ground level ozone which damages vegetation and ecosystems and may cause or exacerbate a number of respiratory diseases, including asthma, especially in children.

c. Minimum Expenditure

The Respondent shall contribute at least the SEP Offset Amount to the Third-Party Administrator and comply with all other provisions of this SEP.

2. Performance Schedule

Within 30 days after the effective date of this Agreed Order, the Respondent must contribute the SEP Offset Amount to the Third-Party Administrator. The Respondent shall make the check payable to **Texas City Independent School District SEP** and shall mail the contribution with a copy of the Agreed Order to:

Texas City Independent School District SEP Attention: Megan Gallien, Chief Financial Officer Griffith, Moseley, Johnson & Associates, Inc. 2901 Turtle Creek Drive, Suite 445 Port Arthur, Texas 77642

3. Records and Reporting

Concurrent with the payment of the SEP Offset Amount, the Respondent shall provide the Enforcement SEP Coordinator with a copy of the check and transmittal letter indicating full payment of the SEP Offset Amount to the Third-Party Administrator. The Respondent shall mail a copy of the check and transmittal letter to:

Texas Commission on Environmental Quality Enforcement Division Attention: SEP Coordinator, MC 219 P.O. Box 13087 Austin, Texas 78711-3087 INEOS USA LLC Docket No. 2021-0818-AIR-E Agreed Order - Attachment A

4. Failure to Fully Perform

If the Respondent does not perform its obligations under this Attachment A, including full expenditure of the SEP Offset Amount and submittal of the required reporting described in Sections 2 and 3 above, the ED may require immediate payment of all or part of the SEP Offset Amount.

In the event the ED determines that the Respondent failed to fully implement and complete the Project, the Respondent shall remit payment for all or a portion of the SEP Offset Amount, as determined by the ED, and as set forth in the attached Agreed Order. After receiving notice of failure to complete the SEP, the Respondent shall include the docket number of the attached Agreed Order and a note that the enclosed payment is for the reimbursement of a SEP, shall make the check payable to "Texas Commission on Environmental Quality," and shall mail it to:

Texas Commission on Environmental Quality Litigation Division Attention: SEP Coordinator, MC 175 P.O. Box 13087 Austin, Texas 78711-3087

5. Publicity

Any public statements concerning this SEP and/or project, made by or on behalf of the Respondent must include a clear statement that **the project was performed as part of the settlement of an enforcement action brought by the TCEQ**. Such statements include advertising, public relations, and press releases.

6. Recognition

The Respondent may not seek recognition for this contribution in any other state or federal regulatory program.

7. Other SEPs by TCEQ or Other Agencies

The SEP Offset Amount identified in this Attachment A and in the attached Agreed Order has not been, and shall not be, included as a SEP for the Respondent under any other Agreed Order negotiated with the TCEQ or any other agency of the state or federal government.