

Executive Summary - Enforcement Matter - Case No. 61313
Bluehall Incorporated, Indorama Ventures Oxides International LLC, Indorama
Ventures Oxides LLC, Indorama Ventures Propylene Oxides LLC, and TPC Group
LLC
RN100219252
Docket No. 2021-1200-IWD-E

Order Type:

1660 Agreed Order

Findings Order Justification:

N/A

Media:

IWD

Small Business:

No

Location(s) Where Violation(s) Occurred:

Port Neches Operations, 2701 Spur 136, Port Neches, Jefferson County

Type of Operation:

Wastewater treatment facility for neighboring petrochemical, industrial gas, and synthetic rubber plants

Other Significant Matters:

Additional Pending Enforcement Actions: Yes, Docket Nos. 2022-1445-AIR-E; 2025-0999-AIR-E; 2025-1087-AIR-E; and 2025-1439-AIR-E

Past-Due Penalties: No

Past-Due Fees: No

Other: N/A

Interested Third-Parties: None

Texas Register Publication Date: March 13, 2026

Comments Received: No

Penalty Information

Total Penalty Assessed: \$205,104

Amount Deferred for Expedited Settlement: \$41,020

Total Paid to General Revenue: \$82,042

Total Due to General Revenue: \$0

Payment Plan: N/A

Supplemental Environmental Project ("SEP") Conditional Offset: \$82,042

Name of SEP: Texas Water Development Board (Third-Party Pre-Approved)

Compliance History Classifications:

Person/CN - Satisfactory

Site/RN - Satisfactory

Major Source: Yes

Statutory Limit Adjustment: N/A

Applicable Penalty Policy: January 2021

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Docket No. 2021-1200-IWD-E

Investigation Information

Complaint Date(s): N/A
Complaint Information: N/A
Date(s) of Investigation: May 26, 2021
Date(s) of NOE(s): July 2, 2021

Violation Information

1. Failed to comply with permitted effluent limitations for zinc, ammonia nitrogen, chemical oxygen demand, total suspended solids, *Enterococci*, dissolved oxygen, phenols, biochemical oxygen demand (5-day), carbonaceous biochemical oxygen demand (5-day) [30 TEX. ADMIN. CODE § 305.125(1), TEX. WATER CODE § 26.121(a)(1), and TPDES Permit No. WQ0000511000, Effluent Limitations and Monitoring Requirements No. 1, Outfall Nos. 001, 004, 301, 601, and 701].
2. Failed to collect and analyze effluent samples at the intervals specified in the permit. Specifically, the Respondents did not collect and analyze a sample for carbonaceous biochemical oxygen demand (5-day) for the month of October 2020 for Outfall No. 001 [30 TEX. ADMIN. CODE §§ 305.125(1) and 319.5(b) and TPDES Permit No. WQ0000511000, Effluent Limitations and Monitoring Requirements No. 1, Outfall No. 001].

Corrective Actions/Technical Requirements

Corrective Action(s) Completed:

By November 30, 2020, the Respondents began collecting and analyzing samples for carbonaceous biochemical oxygen demand (5-day) at the intervals specified in the permit at the Facility.

Technical Requirements:

1. The Order will require the Respondents to implement and complete a SEP (see SEP Attachment A).
2. The Order will also require the Respondents to, within 130 days, submit written certification of compliance with the permitted effluent limitations of TPDES Permit No. WQ0000511000, including specific corrective actions that were implemented at the Facility to achieve compliance and copies of the most current self-reported discharge monitoring reports, demonstrating at least three consecutive months of compliance with all permitted effluent limitations to demonstrate compliance.

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LLC
RN100219252
Docket No. 2021-1200-IWD-E

Contact Information

TCEQ Attorney: N/A

TCEQ Enforcement Coordinator: Bethany Batchelor, Enforcement Division,
Enforcement Backlog Team, MC R-12, (713) 767-3586; Michael Parrish, Enforcement
Division, MC R-12, (512) 239-2548

TCEQ SEP Coordinator: Stuart Beckley, Enforcement Division, MC 219, (512) 239-3565

SEP Third-Party Administrator: Texas Water Development Board, P.O. Box 13231,
Austin, Texas 78711

Respondent: Kho Irani, President and Chief Executive Officer, Bluehall Incorporated,
24 Waterway Avenue, 11th floor, The Woodlands, Texas 77380

David Hext, Operations Director, Indorama Ventures, 2625 Bay Area Boulevard,
Houston, Texas 77058

Chad Anderson, Chief Manufacturing & Technology Officer, Indorama Ventures, 2625
Bay Area Boulevard, Houston, Texas 77058

Guy Burnaman, Director of Terminals, TPC Group, 500 Dallas Street, Suite 1000,
Houston, Texas 77002-4718

Respondent's Attorney: N/A



Penalty Calculation Worksheet (PCW)

Policy Revision 5 (January 28, 2021)

PCW Revision February 11, 2021

DATES	Assigned PCW	12-Jul-2021	Screening	3-Aug-2021	EPA Due	5-Sep-2021
	PCW	10-Mar-2025				

RESPONDENT/FACILITY INFORMATION	
Respondent	Bluehall Incorporated, Indorama Ventures Oxides International LLC, Indorama Ventures Oxides LLC, Indorama Ventures Propylene Oxides LLC, and TPC Group LLC
Reg. Ent. Ref. No.	RN100219252
Facility/Site Region	10-Beaumont
Major/Minor Source	Major

CASE INFORMATION				
Enf./Case ID No.	61313	No. of Violations	5	
Docket No.	2021-1200-IWD-E	Order Type	1660	
Media Program(s)	Water Quality	Government/Non-Profit	No	
Multi-Media		Enf. Coordinator	Bethany Batchelor	
		EC's Team	Enforcement Team 1	
Admin. Penalty \$	Limit Minimum	\$0	Maximum	\$25,000

Penalty Calculation Section

TOTAL BASE PENALTY (Sum of violation base penalties)	Subtotal 1	\$102,500
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ADJUSTMENTS (+/-) TO SUBTOTAL 1

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

Compliance History	100.0%	Adjustment	Subtotals 2, 3, & 7	\$102,500
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Notes: Enhancement for nine self-reported effluent violations, one NOV with same/similar violations, four NOVs with dissimilar violations, and five orders with a denial of liability. Reduction for one notice of intent to conduct an audit and one disclosure of violations.

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

Good Faith Effort to Comply Total Adjustments	Subtotal 5	\$0
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Economic Benefit	0.0%	Enhancement*	Subtotal 6	\$0
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Total EB Amounts: \$14,159
 Estimated Cost of Compliance: \$50,100
 *Capped at the Total EB \$ Amount

SUM OF SUBTOTALS 1-7	Final Subtotal	\$205,000
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OTHER FACTORS AS JUSTICE MAY REQUIRE	0.1%	Adjustment	\$104
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Reduces or enhances the Final Subtotal by the indicated percentage.

Notes: Recommended enhancement to capture the avoided cost of compliance associated with Violation No. 5.

Final Penalty Amount	\$205,104
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STATUTORY LIMIT ADJUSTMENT	Final Assessed Penalty	\$205,104
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DEFERRAL	20.0%	Reduction	Adjustment	-\$41,020
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Reduces the Final Assessed Penalty by the indicated percentage.

Notes: Deferral offered for expedited settlement.

PAYABLE PENALTY	\$164,084
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Screening Date 3-Aug-2021

Docket No. 2021-1200-IWD-E

PCW

Bluehall Incorporated, Indorama Ventures Oxides International LLC, Indorama Ventures Oxides LLC, Indorama Ventures Propylene Oxides LLC, and TPC Group LLC

Policy Revision 5 (January 28, 2021)

PCW Revision February 11, 2021

Respondent Case ID No. 61313

Reg. Ent. Reference No. RN100219252

Media Water Quality

Enf. Coordinator Bethany Batchelor

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>)	10	50%
	Other written NOVs	4	8%
Orders	Any agreed final enforcement orders containing a denial of liability (<i>number of orders meeting criteria</i>)	5	100%
	Any adjudicated final enforcement orders, agreed final enforcement orders without a denial of liability, or default orders of this state or the federal government, or any final prohibitory emergency orders issued by the commission	0	0%
Judgments and Consent Decrees	Any non-adjudicated final court judgments or consent decrees containing a denial of liability of this state or the federal government (<i>number of judgments or consent decrees meeting criteria</i>)	0	0%
	Any adjudicated final court judgments and default judgments, or non-adjudicated final court judgments or consent decrees without a denial of liability, of this state or the federal government	0	0%
Convictions	Any criminal convictions of this state or the federal government (<i>number of counts</i>)	0	0%
Emissions	Chronic excessive emissions events (<i>number of events</i>)	0	0%
Audits	Letters notifying the executive director of an intended audit conducted under the Texas Environmental, Health, and Safety Audit Privilege Act, 74th Legislature, 1995 (<i>number of audits for which notices were submitted</i>)	1	-1%
	Disclosures of violations under the Texas Environmental, Health, and Safety Audit Privilege Act, 74th Legislature, 1995 (<i>number of audits for which violations were disclosed</i>)	1	-2%
Other	Environmental management systems in place for one year or more	No	0%
	Voluntary on-site compliance assessments conducted by the executive director under a special assistance program	No	0%
	Participation in a voluntary pollution reduction program	No	0%
	Early compliance with, or offer of a product that meets future state or federal government environmental requirements	No	0%

Adjustment Percentage (Subtotal 2) 155%

>> Repeat Violator (Subtotal 3)

No

Adjustment Percentage (Subtotal 3) 0%

>> Compliance History Person Classification (Subtotal 7)

Satisfactory Performer

Adjustment Percentage (Subtotal 7) 0%

>> Compliance History Summary

Compliance History Notes	Enhancement for nine self-reported effluent violations, one NOV with same/similar violations, four NOVs with dissimilar violations, and five orders with a denial of liability. Reduction for one notice of intent to conduct an audit and one disclosure of violations.
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Total Compliance History Adjustment Percentage (Subtotals 2, 3, & 7) 155%

>> Final Compliance History Adjustment

Final Adjustment Percentage *capped at 100% 100%

Screening Date	3-Aug-2021	Docket No.	2021-1200-IWD-E	PCW
Respondent Case ID No.	61313	Bluehall Incorporated, Indorama Ventures Oxides International LLC, Indorama Ventures Oxides LLC, Indorama Ventures Propylene Oxides LLC, and TPC Group LLC		<i>Policy Revision 5 (January 28, 2021) PCW Revision February 11, 2021</i>
Reg. Ent. Reference No.	RN100219252			
Media	Water Quality			
Enf. Coordinator	Bethany Batchelor			
Violation Number	1			
Rule Cite(s)	30 Tex. Admin. Code § 305.125(1), Tex. Water Code § 26.121(a)(1), and TPDES Permit No. WQ0000511000, Effluent Limitations and Monitoring Requirements No. 1, Outfall Nos. 001 and 004			
Violation Description	Failed to comply with permitted effluent limitations, as shown in the attached effluent violation table.			
Base Penalty				\$25,000

>> Environmental, Property and Human Health Matrix

OR		Harm			
	Release	Major	Moderate	Minor	
	Actual		X		Percent 50.0%
	Potential				

>> Programmatic Matrix

	Falsification	Major	Moderate	Minor	Percent 0.0%

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

Adjustment \$12,500

\$12,500

Violation Events

Number of Violation Events: 3 92 Number of violation days

daily	
weekly	
monthly	X
quarterly	
semiannual	
annual	
single event	

Violation Base Penalty \$37,500

Three monthly events are recommended. One for Outfall No. 001 for the month of December 2020. Two for Outfall No. 004 for the months of September 2020 and January 2021.

Good Faith Efforts to Comply 0.0% Reduction \$0

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

Notes: The Respondents do not meet the good faith criteria for this violation.

Violation Subtotal \$37,500

Economic Benefit (EB) for this violation **Statutory Limit Test**

Estimated EB Amount \$14,055 **Violation Final Penalty Total** \$75,038

This violation Final Assessed Penalty (adjusted for limits) \$75,038

Economic Benefit Worksheet

Respondent Bluehall Incorporated, Indorama Ventures Oxides International LLC, Indorama Ventures Oxides LLC, Indorama Ventures Propylene Oxides LLC, and TPC Group LLC

Case ID No. 61313

Reg. Ent. Reference No. RN100219252

Media Violation No. Water Quality
1

Percent Interest	Years of Depreciation
5.0	15

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

Equipment				0.00	\$0	\$0	\$0
Buildings				0.00	\$0	\$0	\$0
Other (as needed)				0.00	\$0	\$0	\$0
Engineering/Construction				0.00	\$0	\$0	\$0
Land				0.00	\$0	n/a	\$0
Record Keeping System				0.00	\$0	n/a	\$0
Training/Sampling				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)	\$50,000	30-Sep-2020	14-May-2026	5.62	\$14,055	n/a	\$14,055

Notes for DELAYED costs Estimated Other cost to determine the cause of noncompliance, make the necessary repairs/adjustments to the Facility, and achieve compliance with the permitted effluent limitations. The Date Required is the end date of the first month of noncompliance. The Final Date is the estimated date of compliance.

Avoided Costs

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

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

Notes for AVOIDED costs

Approx. Cost of Compliance \$50,000

TOTAL \$14,055

Screening Date	3-Aug-2021	Docket No.	2021-1200-IWD-E	PCW
Respondent	Bluehall Incorporated, Indorama Ventures Oxides International LLC, Indorama Ventures Oxides LLC, Indorama Ventures Propylene Oxides LLC, and TPC Group LLC			
Case ID No.	61313	<i>Policy Revision 5 (January 28, 2021)</i>		
Reg. Ent. Reference No.	RN100219252	<i>PCW Revision February 11, 2021</i>		
Media	Water Quality			
Enf. Coordinator	Bethany Batchelor			
Violation Number	2			
Rule Cite(s)	30 Tex. Admin. Code § 305.125(1), Tex. Water Code § 26.121(a)(1), and TPDES Permit No. WQ0000511000, Effluent Limitations and Monitoring Requirements No. 1, Outfall Nos. 001 and 004			
Violation Description	Failed to comply with permitted effluent limitations, as shown in the attached effluent violation table.			
Base Penalty				\$25,000
>> Environmental, Property and Human Health Matrix				
OR	Harm			
	Release	Major	Moderate	Minor
	Actual			X
Potential				
				Percent 30.0%
>> Programmatic Matrix				
				Percent 0.0%
Matrix Notes	Human health or the environment has been exposed to insignificant amounts of pollutants that do not exceed levels that are protective of human health or environmental receptors as a result of the violation.			
Adjustment				\$17,500
				\$7,500
Violation Events				
Number of Violation Events		4	Number of violation days	
		94		
	daily			
	weekly			
	monthly			
	quarterly	X		
	semiannual			
	annual			
	single event			
				Violation Base Penalty \$30,000
Four quarterly events are recommended. Two for Outfall No. 001 for the quarters containing the months of November 2020 and January 2021. Two for Outfall No. 004 for the quarters containing the months of April, November, and December 2020.				
Good Faith Efforts to Comply		0.0%	Reduction \$0	
<small>Before NOE/NOV NOE/NOV to EDRP/Settlement Offer</small>				
	Extraordinary			
	Ordinary			
	N/A	x		
Notes	The Respondents do not meet the good faith criteria for this violation.			
Violation Subtotal				\$30,000
Economic Benefit (EB) for this violation			Statutory Limit Test	
Estimated EB Amount		\$0	Violation Final Penalty Total \$60,030	
This violation Final Assessed Penalty (adjusted for limits)				\$60,030

Economic Benefit Worksheet

Respondent Bluehall Incorporated, Indorama Ventures Oxides International LLC, Indorama Ventures Oxides LLC, Indorama Ventures Propylene Oxides LLC, and TPC Group LLC

Case ID No. 61313

Reg. Ent. Reference No. RN100219252

Media Violation No. Water Quality
2

Percent Interest	Years of Depreciation
5.0	15

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

Equipment				0.00	\$0	\$0	\$0
Buildings				0.00	\$0	\$0	\$0
Other (as needed)				0.00	\$0	\$0	\$0
Engineering/Construction				0.00	\$0	\$0	\$0
Land				0.00	\$0	n/a	\$0
Record Keeping System				0.00	\$0	n/a	\$0
Training/Sampling				0.00	\$0	n/a	\$0
Remediation/Disposal				0.00	\$0	n/a	\$0
Permit Costs				0.00	\$0	n/a	\$0
Other (as needed)				0.00	\$0	n/a	\$0

Notes for DELAYED costs Estimated Other cost to determine the cause of noncompliance, make the necessary repairs/adjustments to the Facility, and achieve compliance with the permitted effluent limitations is captured in Economic Benefit Worksheet No. 1.

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 \$0 **TOTAL** \$0

Screening Date	3-Aug-2021	Docket No.	2021-1200-IWD-E	PCW
Respondent	Bluehall Incorporated, Indorama Ventures Oxides International LLC, Indorama Ventures Oxides LLC, Indorama Ventures Propylene Oxides LLC, and TPC Group LLC			<i>Policy Revision 5 (January 28, 2021)</i> <i>PCW Revision February 11, 2021</i>
Case ID No.	61313			
Reg. Ent. Reference No.	RN100219252			
Media	Water Quality			
Enf. Coordinator	Bethany Batchelor			
Violation Number	3			
Rule Cite(s)	30 Tex. Admin. Code § 305.125(1), Tex. Water Code § 26.121(a)(1), and TPDES Permit No. WQ0000511000, Effluent Limitations and Monitoring Requirements No. 1, Outfall No. 301			
Violation Description	Failed to comply with permitted effluent limitations, as shown in the attached effluent violation table.			
		Base Penalty	\$25,000	

>> Environmental, Property and Human Health Matrix

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

>> Programmatic Matrix

	Falsification	Major	Moderate	Minor	
					Percent 0.0%

Matrix Notes: Human health or the environment will or could be exposed to pollutants that would exceed levels that are protective of human health or environmental receptors as a result of the violation.

Adjustment \$17,500

\$7,500

Violation Events

Number of Violation Events: 3 91 Number of violation days

daily	
weekly	
monthly	x
quarterly	
semiannual	
annual	
single event	

Violation Base Penalty \$22,500

Three monthly events are recommended for the months of June, August, and November 2020.

Good Faith Efforts to Comply **0.0%** Reduction \$0

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

Notes: The Respondents do not meet the good faith criteria for this violation.

Violation Subtotal \$22,500

Economic Benefit (EB) for this violation **Statutory Limit Test**

Estimated EB Amount \$0 **Violation Final Penalty Total** \$45,023

This violation Final Assessed Penalty (adjusted for limits) \$45,023

Economic Benefit Worksheet

Respondent Bluehall Incorporated, Indorama Ventures Oxides International LLC, Indorama Ventures Oxides LLC, Indorama Ventures Propylene Oxides LLC, and TPC Group LLC

Case ID No. 61313

Reg. Ent. Reference No. RN100219252

Media Violation No. Water Quality
3

Percent Interest	Years of Depreciation
5.0	15

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

Equipment				0.00	\$0	\$0	\$0
Buildings				0.00	\$0	\$0	\$0
Other (as needed)				0.00	\$0	\$0	\$0
Engineering/Construction				0.00	\$0	\$0	\$0
Land				0.00	\$0	n/a	\$0
Record Keeping System				0.00	\$0	n/a	\$0
Training/Sampling				0.00	\$0	n/a	\$0
Remediation/Disposal				0.00	\$0	n/a	\$0
Permit Costs				0.00	\$0	n/a	\$0
Other (as needed)				0.00	\$0	n/a	\$0

Notes for DELAYED costs

Estimated Other cost to determine the cause of noncompliance, make the necessary repairs/adjustments to the Facility, and achieve compliance with the permitted effluent limitations is captured in Economic Benefit Worksheet No. 1.

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 \$0

TOTAL \$0

Screening Date	3-Aug-2021	Docket No.	2021-1200-IWD-E	PCW
Respondent	Bluehall Incorporated, Indorama Ventures Oxides International LLC, Indorama Ventures Oxides LLC, Indorama Ventures Propylene Oxides LLC, and TPC Group LLC			<i>Policy Revision 5 (January 28, 2021)</i>
Case ID No.	61313			<i>PCW Revision February 11, 2021</i>
Reg. Ent. Reference No.	RN100219252			
Media	Water Quality			
Enf. Coordinator	Bethany Batchelor			
Violation Number	4			
Rule Cite(s)	30 Tex. Admin. Code § 305.125(1), Tex. Water Code § 26.121(a)(1), and TPDES Permit No. WQ0000511000, Effluent Limitations and Monitoring Requirements No. 1, Outfall Nos. 301, 601, and 701			
Violation Description	Failed to comply with permitted effluent limitations, as shown in the attached effluent violation table.			
		Base Penalty	\$25,000	

>> Environmental, Property and Human Health Matrix

OR		Harm			
	Release	Major	Moderate	Minor	
	Actual				
	Potential			X	Percent 7.0%

>> Programmatic Matrix

	Falsification	Major	Moderate	Minor	
					Percent 0.0%

Matrix Notes: Human health or the environment will or could be exposed to insignificant amounts of pollutants that would not exceed levels that are protective of human health or environmental receptors as a result of the violation.

Adjustment \$23,250
\$1,750

Violation Events

Number of Violation Events: 5 185 Number of violation days

daily	
weekly	
monthly	
quarterly	x
semiannual	
annual	
single event	

Violation Base Penalty \$8,750

Five quarterly events are recommended. Two for Outfall 301, one for the quarter containing the month of July 2020 and one for the quarter containing the month of March 2021. One for Outfall 301, for the quarterly period ending July 2020. One for Outfall 601, for the quarter containing the months of October and November 2020. One for Outfall 701, for the quarter containing the months of December 2020 and January 2021.

Good Faith Efforts to Comply **0.0%** Reduction \$0

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

Notes: The Respondents do not meet the good faith criteria for this violation.

Violation Subtotal \$8,750

Economic Benefit (EB) for this violation **Statutory Limit Test**

Estimated EB Amount \$0 **Violation Final Penalty Total** \$17,509

This violation Final Assessed Penalty (adjusted for limits) \$17,509

Economic Benefit Worksheet

Respondent Bluehall Incorporated, Indorama Ventures Oxides International LLC, Indorama Ventures Oxides LLC, Indorama Ventures Propylene Oxides LLC, and TPC Group LLC

Case ID No. 61313

Reg. Ent. Reference No. RN100219252

Media Violation No. Water Quality
4

Percent Interest	Years of Depreciation
5.0	15

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

Equipment				0.00	\$0	\$0	\$0
Buildings				0.00	\$0	\$0	\$0
Other (as needed)				0.00	\$0	\$0	\$0
Engineering/Construction				0.00	\$0	\$0	\$0
Land				0.00	\$0	n/a	\$0
Record Keeping System				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 Estimated Other cost to determine the cause of noncompliance, make the necessary repairs/adjustments to the Facility, and achieve compliance with the permitted effluent limitations is captured in Economic Benefit Worksheet No. 1.

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 \$0

TOTAL \$0

Screening Date	3-Aug-2021	Docket No.	2021-1200-IWD-E	PCW
Respondent	Bluehall Incorporated, Indorama Ventures Oxides International LLC, Indorama Ventures Oxides LLC, Indorama Ventures Propylene Oxides LLC, and TPC Group LLC			<i>Policy Revision 5 (January 28, 2021)</i>
Case ID No.	61313			<i>PCW Revision February 11, 2021</i>
Reg. Ent. Reference No.	RN100219252			
Media	Water Quality			
Enf. Coordinator	Bethany Batchelor			
Violation Number	5			
Rule Cite(s)	30 Tex. Admin. Code §§ 305.125(1) and 319.5(b) and TPDES Permit No. WQ0000511000, Effluent Limitations and Monitoring Requirements No. 1, Outfall No. 001			
Violation Description	Failed to collect and analyze effluent samples at the intervals specified in the permit. Specifically, the Respondent did not collect and analyze a sample for carbonaceous biochemical oxygen demand (5-day) for the month of October 2020 for Outfall No. 001.			

Base Penalty

>> Environmental, Property and Human Health Matrix

OR		Harm			
	Release	Major	Moderate	Minor	
	Actual	<input type="text"/>	<input type="text"/>	<input type="text"/>	Percent <input type="text" value="15.0%"/>
Potential	<input type="text"/>	X	<input type="text"/>		

>> Programmatic Matrix

	Falsification	Major	Moderate	Minor	
	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	Percent <input type="text" value="0.0%"/>

Matrix Notes Human health or the environment will or could be exposed to significant amounts of pollutants that would not exceed levels that are protective of human health or environmental receptors as a result of the violation.

Adjustment

Violation Events

Number of Violation Events Number of violation days

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

Violation Base Penalty

One single event is recommended.

Good Faith Efforts to Comply Reduction

	Before NOE/NOV	NOE/NOV to EDPRP/Settlement Offer
Extraordinary	<input type="text"/>	<input type="text"/>
Ordinary	<input type="text"/>	<input type="text"/>
N/A	X	<input type="text"/>

Notes The Respondents do not meet the good faith criteria for this violation.

Violation Subtotal

Economic Benefit (EB) for this violation **Statutory Limit Test**

Estimated EB Amount **Violation Final Penalty Total**

This violation Final Assessed Penalty (adjusted for limits)

Economic Benefit Worksheet

Respondent Bluehall Incorporated, Indorama Ventures Oxides International LLC, Indorama Ventures Oxides LLC, Indorama Ventures Propylene Oxides LLC, and TPC Group LLC

Case ID No. 61313

Reg. Ent. Reference No. RN100219252

Media Violation No. Water Quality

5

Percent Interest	Years of Depreciation
5.0	15

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

Equipment				0.00	\$0	\$0	\$0
Buildings				0.00	\$0	\$0	\$0
Other (as needed)				0.00	\$0	\$0	\$0
Engineering/Construction				0.00	\$0	\$0	\$0
Land				0.00	\$0	n/a	\$0
Record Keeping System				0.00	\$0	n/a	\$0
Training/Sampling				0.00	\$0	n/a	\$0
Remediation/Disposal				0.00	\$0	n/a	\$0
Permit Costs				0.00	\$0	n/a	\$0
Other (as needed)				0.00	\$0	n/a	\$0

Notes for DELAYED costs

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)	\$100	31-Oct-2020	3-Aug-2021	0.76	\$4	\$100	\$104

Notes for AVOIDED costs

Estimated avoided cost to collect and analyze effluent samples. The Date Required is the end date of the month of noncompliance. The Final Date is the screening date.

Approx. Cost of Compliance \$100

TOTAL \$104

Indorama Ventures Oxides LLC, Indorama Ventures Oxides International LLC, Indorama Ventures
 Propylene Oxides LLC, Bluehall Incorporated, and TPC Group LLC
 Docket No. 2021-1200-IWD-E
 TPDES Permit No. WQ0000511000

Effluent Violation Table

Outfall No. 001				Outfall No. 004			
	CBOD5		Zinc	CBOD5		Ammonia Nitrogen	
	Daily Avg. Conc.	Daily Max. Conc.	Daily Max. Conc.	Daily Avg. Conc.	Daily Max. Conc.	Daily Avg. Conc.	Daily Max. Conc.
Monitoring Period	Limit = 10 mg/L	Limit = 30 mg/L	Limit = 0.150 mg/L	Limit = 10 mg/L	Limit = 30 mg/L	Limit = 8.0 mg/L	Limit = 15 mg/L
April 2020	c	c	c	c	40	c	c
September 2020	c	c	c	c	c	12.53	15.92
November 2020	10.36	c	c	18.62	31	c	c
December 2020	27	62	0.177	11	c	c	c
January 2021	58	58	c	35.16	46.35	8.58	c

Outfall No. 301

	BOD5		<i>Enterococci</i>		Chem. Oxygen Demand		TSS
	Daily Avg. Load.	Daily Max. Load.	Daily Avg. Conc.	Daily Max. Conc.	Daily Avg. Load.	Daily Max. Load.	Daily Avg. Load.
Monitoring Period	Limit = 1,798 lbs/day	Limit = 4,567 lbs/day	Limit = 35 CFU/100mL	Limit = 104 CFU/100mL	Limit = 10,700 lbs/day	Limit = 20,812 lbs/day	Limit = 2,973 lbs/day
June 2020	c	c	97.95	24,200	c	c	c
July 2020	c	c	119.74	221.52	c	c	c
August 2020	c	c	159.14	7,700	c	c	c
November 2020	1,995.34	c	137.73	5,170	12,943.1	21,600.81	49,770
March 2021	c	8,999.53	c	c	c	c	c

Effluent Violation Table (continued)				
	Outfall No. 301		Outfall No. 601	Outfall No. 701
	Phenols*		Dissolved Oxygen	Dissolved Oxygen
	Daily Avg. Load.	Daily Max. Load.	Single Grab Min. Conc.	Single Grab Min. Conc.
Monitoring Period	Limit = 10 lbs/day	Limit = 20 lbs/day	Limit = 3.0 mg/L	Limit = 2.0 mg/L
July 2020	10.7	25.7	c	c
October 2020	c	c	1.15	c
November 2020	c	c	0.62	c
December 2020	c	c	c	0.39
January 2021	c	c	c	0.32

c = compliant Avg. = average Max. = maximum Min. = minimum Conc. = concentration

Load. = loading mg/L = milligrams per liter TSS = total suspended solids No. = number

Chem. = chemical lbs/day = pounds per day * = done quarterly

CFU/100mL = colony forming units per 100 milliliters BOD5 = biochemical oxygen demand (5-day)

CBOD5 = carbonaceous biochemical oxygen demand (5-day)



Compliance History Report

Compliance History Report for CN605120393, RN100219252, Rating Year 2022 which includes Compliance History (CH) components from September 1, 2017, through August 31, 2022.

Customer, Respondent, or Owner/Operator:	CN605120393, Bluehall Incorporated	Classification:	SATISFACTORY	Rating:	3.08
Regulated Entity:	RN100219252, PORT NECHES OPERATIONS	Classification:	SATISFACTORY	Rating:	3.08
Complexity Points:	47	Repeat Violator:	NO		
CH Group:	05 - Chemical Manufacturing				
Location:	2701 Spur 136 in Port Neches, Jefferson County, Texas				
TCEQ Region:	REGION 10 - BEAUMONT				

ID Number(s):

AIR OPERATING PERMITS ACCOUNT NUMBER JE0052V

AIR OPERATING PERMITS PERMIT 2286

AIR OPERATING PERMITS PERMIT 2288

AIR NEW SOURCE PERMITS AFS NUM 4824500006

AIR NEW SOURCE PERMITS REGISTRATION 51736

AIR NEW SOURCE PERMITS REGISTRATION 54551

AIR NEW SOURCE PERMITS REGISTRATION 44034

AIR NEW SOURCE PERMITS REGISTRATION 45090

AIR NEW SOURCE PERMITS REGISTRATION 45277

AIR NEW SOURCE PERMITS REGISTRATION 47065

AIR NEW SOURCE PERMITS REGISTRATION 47555

AIR NEW SOURCE PERMITS REGISTRATION 47887

AIR NEW SOURCE PERMITS REGISTRATION 48176

AIR NEW SOURCE PERMITS REGISTRATION 49493

AIR NEW SOURCE PERMITS PERMIT 647B

AIR NEW SOURCE PERMITS PERMIT 5952A

AIR NEW SOURCE PERMITS REGISTRATION 7761

AIR NEW SOURCE PERMITS PERMIT 19823

AIR NEW SOURCE PERMITS PERMIT 20160

AIR NEW SOURCE PERMITS REGISTRATION 31443

AIR NEW SOURCE PERMITS REGISTRATION 36453

AIR NEW SOURCE PERMITS REGISTRATION 40103

AIR NEW SOURCE PERMITS REGISTRATION 41444

AIR NEW SOURCE PERMITS REGISTRATION 41757

AIR NEW SOURCE PERMITS REGISTRATION 42153

AIR NEW SOURCE PERMITS REGISTRATION 75597

AIR NEW SOURCE PERMITS REGISTRATION 75748

AIR NEW SOURCE PERMITS REGISTRATION 55753

AIR NEW SOURCE PERMITS PERMIT 56390

AIR NEW SOURCE PERMITS REGISTRATION 70571

AIR NEW SOURCE PERMITS REGISTRATION 70726

AIR NEW SOURCE PERMITS REGISTRATION 56073

AIR NEW SOURCE PERMITS REGISTRATION 54219

AIR NEW SOURCE PERMITS REGISTRATION 72310

AIR NEW SOURCE PERMITS REGISTRATION 54570

AIR NEW SOURCE PERMITS REGISTRATION 71751

AIR NEW SOURCE PERMITS REGISTRATION 50360

AIR NEW SOURCE PERMITS REGISTRATION 72907

AIR NEW SOURCE PERMITS REGISTRATION 75203

AIR NEW SOURCE PERMITS REGISTRATION 76732

AIR NEW SOURCE PERMITS REGISTRATION 78974

AIR OPERATING PERMITS PERMIT 1320

AIR OPERATING PERMITS PERMIT 2287

AIR OPERATING PERMITS PERMIT 3056

AIR NEW SOURCE PERMITS PERMIT 29516

AIR NEW SOURCE PERMITS REGISTRATION 52715

AIR NEW SOURCE PERMITS REGISTRATION 54565

AIR NEW SOURCE PERMITS REGISTRATION 44434

AIR NEW SOURCE PERMITS REGISTRATION 45094

AIR NEW SOURCE PERMITS REGISTRATION 46791

AIR NEW SOURCE PERMITS REGISTRATION 47066

AIR NEW SOURCE PERMITS REGISTRATION 47577

AIR NEW SOURCE PERMITS REGISTRATION 48178

AIR NEW SOURCE PERMITS PERMIT 49247

AIR NEW SOURCE PERMITS ACCOUNT NUMBER JE0052V

AIR NEW SOURCE PERMITS PERMIT 5807A

AIR NEW SOURCE PERMITS PERMIT 5972A

AIR NEW SOURCE PERMITS PERMIT 16909

AIR NEW SOURCE PERMITS PERMIT 20134

AIR NEW SOURCE PERMITS REGISTRATION 23568

AIR NEW SOURCE PERMITS PERMIT 36646

AIR NEW SOURCE PERMITS REGISTRATION 39725

AIR NEW SOURCE PERMITS REGISTRATION 40527

AIR NEW SOURCE PERMITS REGISTRATION 41301

AIR NEW SOURCE PERMITS REGISTRATION 42103

AIR NEW SOURCE PERMITS REGISTRATION 42154

AIR NEW SOURCE PERMITS REGISTRATION 76018

AIR NEW SOURCE PERMITS PERMIT 83816

AIR NEW SOURCE PERMITS REGISTRATION 70024

AIR NEW SOURCE PERMITS REGISTRATION 56243

AIR NEW SOURCE PERMITS REGISTRATION 70781

AIR NEW SOURCE PERMITS REGISTRATION 53551

AIR NEW SOURCE PERMITS REGISTRATION 70011

AIR NEW SOURCE PERMITS REGISTRATION 53979

AIR NEW SOURCE PERMITS REGISTRATION 54231

AIR NEW SOURCE PERMITS REGISTRATION 54234

AIR NEW SOURCE PERMITS REGISTRATION 52077

AIR NEW SOURCE PERMITS REGISTRATION 73663

AIR NEW SOURCE PERMITS REGISTRATION 74296

AIR NEW SOURCE PERMITS REGISTRATION 75202

AIR NEW SOURCE PERMITS REGISTRATION 77129

AIR NEW SOURCE PERMITS REGISTRATION 79529

AIR NEW SOURCE PERMITS REGISTRATION 80149
AIR NEW SOURCE PERMITS REGISTRATION 81531
AIR NEW SOURCE PERMITS REGISTRATION 82922
AIR NEW SOURCE PERMITS EPA PERMIT PSDTX780
AIR NEW SOURCE PERMITS REGISTRATION 139463
AIR NEW SOURCE PERMITS REGISTRATION 110757
AIR NEW SOURCE PERMITS REGISTRATION 110787
AIR NEW SOURCE PERMITS REGISTRATION 110808
AIR NEW SOURCE PERMITS REGISTRATION 150790
AIR NEW SOURCE PERMITS REGISTRATION 153791
AIR NEW SOURCE PERMITS REGISTRATION 152840
AIR NEW SOURCE PERMITS REGISTRATION 154036
AIR NEW SOURCE PERMITS REGISTRATION 164694
AIR NEW SOURCE PERMITS REGISTRATION 168479
AIR NEW SOURCE PERMITS REGISTRATION 169413
AIR NEW SOURCE PERMITS REGISTRATION 164877
AIR NEW SOURCE PERMITS REGISTRATION 167574
AIR NEW SOURCE PERMITS REGISTRATION 170963
AIR NEW SOURCE PERMITS REGISTRATION 163874
AIR NEW SOURCE PERMITS REGISTRATION 142196
AIR NEW SOURCE PERMITS REGISTRATION 148227
AIR NEW SOURCE PERMITS REGISTRATION 150168
AIR NEW SOURCE PERMITS REGISTRATION 156133
AIR NEW SOURCE PERMITS REGISTRATION 155871
AIR NEW SOURCE PERMITS REGISTRATION 160459
AIR NEW SOURCE PERMITS REGISTRATION 155472
AIR NEW SOURCE PERMITS REGISTRATION 161628
AIR NEW SOURCE PERMITS REGISTRATION 152402
AIR NEW SOURCE PERMITS REGISTRATION 155384
AIR NEW SOURCE PERMITS REGISTRATION 155634
PETROLEUM STORAGE TANK REGISTRATION
REGISTRATION 40711
IHW CORRECTIVE ACTION SOLID WASTE REGISTRATION
(SWR) 30029
WASTEWATER EPA ID TX0005070
POLLUTION PREVENTION PLANNING ID NUMBER
P00679
INDUSTRIAL AND HAZARDOUS WASTE PERMIT 50363

INDUSTRIAL AND HAZARDOUS WASTE EPA ID
TXD008076846
TAX RELIEF ID NUMBER 17954
TAX RELIEF ID NUMBER 17984
TAX RELIEF ID NUMBER 17095
TAX RELIEF ID NUMBER 17093
TAX RELIEF ID NUMBER 17940
TAX RELIEF ID NUMBER 17977
TAX RELIEF ID NUMBER 18835
TAX RELIEF ID NUMBER 17985
TAX RELIEF ID NUMBER 24379

Compliance History Period: September 01, 2017 to August 31, 2022

Rating Year: 2022

Rating Date: 09/01/2022

Date Compliance History Report Prepared: January 10, 2023

Agency Decision Requiring Compliance History: Enforcement

Component Period Selected: January 10, 2018 to January 10, 2023

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

Name: Harley Hobson

Phone: (512) 239-1337

Site and Owner/Operator History:

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

YES

AIR NEW SOURCE PERMITS REGISTRATION 80702
AIR NEW SOURCE PERMITS REGISTRATION 81415
AIR NEW SOURCE PERMITS REGISTRATION 92256
AIR NEW SOURCE PERMITS REGISTRATION 91994
AIR NEW SOURCE PERMITS PERMIT 106169
AIR NEW SOURCE PERMITS REGISTRATION 109215
AIR NEW SOURCE PERMITS REGISTRATION 110809
AIR NEW SOURCE PERMITS REGISTRATION 110813
AIR NEW SOURCE PERMITS REGISTRATION 150484
AIR NEW SOURCE PERMITS REGISTRATION 150307
AIR NEW SOURCE PERMITS REGISTRATION 152982
AIR NEW SOURCE PERMITS REGISTRATION 163020
AIR NEW SOURCE PERMITS REGISTRATION 169507
AIR NEW SOURCE PERMITS REGISTRATION 164604
AIR NEW SOURCE PERMITS REGISTRATION 166541
AIR NEW SOURCE PERMITS REGISTRATION 167060
AIR NEW SOURCE PERMITS REGISTRATION 170571
AIR NEW SOURCE PERMITS REGISTRATION 169228
AIR NEW SOURCE PERMITS REGISTRATION 166117
AIR NEW SOURCE PERMITS REGISTRATION 151107
AIR NEW SOURCE PERMITS REGISTRATION 143027
AIR NEW SOURCE PERMITS REGISTRATION 150992
AIR NEW SOURCE PERMITS PERMIT 79802
AIR NEW SOURCE PERMITS REGISTRATION 160594
AIR NEW SOURCE PERMITS REGISTRATION 159322
AIR NEW SOURCE PERMITS REGISTRATION 161151
AIR NEW SOURCE PERMITS REGISTRATION 157572
AIR NEW SOURCE PERMITS REGISTRATION 160045
AIR NEW SOURCE PERMITS REGISTRATION 160606
AIR NEW SOURCE PERMITS REGISTRATION 171239
PETROLEUM STORAGE TANK REGISTRATION
REGISTRATION 79935
WASTEWATER PERMIT WQ0000511000
AIR EMISSIONS INVENTORY ACCOUNT NUMBER JE0052V
INDUSTRIAL AND HAZARDOUS WASTE PERMIT 50055
INDUSTRIAL AND HAZARDOUS WASTE EPA ID
TX0000201202
INDUSTRIAL AND HAZARDOUS WASTE SOLID WASTE
REGISTRATION # (SWR) 30029
TAX RELIEF ID NUMBER 17974
TAX RELIEF ID NUMBER 17986
TAX RELIEF ID NUMBER 17100
TAX RELIEF ID NUMBER 17975
TAX RELIEF ID NUMBER 17983
TAX RELIEF ID NUMBER 18840
TAX RELIEF ID NUMBER 17970
TAX RELIEF ID NUMBER 17088

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

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

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

- 1 Effective Date: 05/04/2018 ADMINORDER 2016-1709-IWD-E (1660 Order-Agreed Order With Denial)
Classification: Major
Citation: 2D TWC Chapter 26, SubChapter A 26.121(a)(1)
30 TAC Chapter 305, SubChapter F 305.125(1)
Rqmt Prov: Effluent Limits PERMIT
Description: Failed to comply with permitted effluent limitations, in violation of TEX. WATER CODE § 26.121(a)(1), 30 TEX. ADMIN. CODE § 305.125(1), and Texas Pollutant Discharge Elimination System ("TPDES") Permit No. WQ0000511000, Effluent Limitations and Monitoring Requirements No. 1, Outfall Nos. 001, 003 and 301 and Effluent Limitations and Monitoring Requirements No. 2, Outfall No. 009

- 2 Effective Date: 10/08/2018 ADMINORDER 2017-1219-AIR-E (1660 Order-Agreed Order With Denial)
Classification: Moderate
Citation: 30 TAC Chapter 116, SubChapter B 116.115(b)(2)(F)
30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)
5C THSC Chapter 382 382.085(b)
Rqmt Prov: General Terms and Conditions OP
Special Condition 1 PERMIT
Special Condition 14 OP
Description: Failure to prevent unauthorized emissions to the atmosphere during an emissions event that occurred on September 23, 2016, TCEQ/STEERS Incident No. 244445.
Classification: Moderate
Citation: 30 TAC Chapter 116, SubChapter B 116.115(b)(2)(F)
30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)
5C THSC Chapter 382 382.085(b)
Rqmt Prov: General Terms and Conditions OP
Special Condition 1 PERMIT
Special Condition 19 OP
Description: Failure to prevent unauthorized emissions to the atmosphere during an emissions event that occurred on October 20, 2016, TCEQ/STEERS Incident No. 245872.
Classification: Moderate
Citation: 30 TAC Chapter 116, SubChapter B 116.115(b)(2)(F)
30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)
5C THSC Chapter 382 382.085(b)
Rqmt Prov: General Terms and Conditions OP
Special Condition 1 PERMIT
Special Condition 17 OP
Description: Failure to prevent unauthorized emissions to the atmosphere during an emissions event that occurred on March 17, 2017, TCEQ Incident 254371.

- 3 Effective Date: 10/27/2020 ADMINORDER 2016-1906-AIR-E (1660 Order-Agreed Order With Denial)
Classification: Moderate
Citation: 30 TAC Chapter 116, SubChapter B 116.115(b)(2)(F)
30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)
Rqmt Prov: General Terms and Conditions OP
Special Condition 1 PERMIT
Special Condition 14 OP
Special Condition 17 OP
Special Condition 19 OP
Description: Failed to prevent unauthorized emissions. Specifically, the Respondent released 175.47 pounds ("lbs") of volatile organic compounds ("VOC") from the F6 Reabsorber Vent during an emissions event (Incident No. 222751) that began on November 7, 2015 and lasted 24 hours.
Classification: Moderate

Citation: 30 TAC Chapter 101, SubChapter F 101.201(b)(1)(H)
30 TAC Chapter 122, SubChapter B 122.143(4)

Rqmt Prov: General Terms and Conditions OP
Special Condition 2F OP

Description: Failure to provide the estimated total quantities of all compounds or mixtures of air contaminants released during an emissions event in the final records (TCEQ/STEERS Incident No. 222751).

Classification: Moderate

Citation: 30 TAC Chapter 116, SubChapter B 116.115(b)(2)(F)
30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)

Rqmt Prov: General Terms and Conditions OP
Special Condition 1 PERMIT
Special Condition 14 OP

Description: Failed to prevent unauthorized emissions. Specifically, the Respondent released 366 lbs of VOC from the F6 Reabsorber Vent during an emissions event (Incident No. 227974) that began on February 18, 2016 and lasted for 16 minutes.

Classification: Moderate

Citation: 30 TAC Chapter 116, SubChapter B 116.115(b)(2)(F)
30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)

Rqmt Prov: General Terms and Conditions OP
Special Condition 1 PERMIT
Special Condition 14 OP

Description: Failed to prevent unauthorized emissions. Specifically, the Respondent released 12,150.14 lbs of VOC from the F6 Reabsorber Vent during an emissions event (Incident No. 230209) that began on March 28, 2016 and lasted for 18 hours.

Classification: Moderate

Citation: 30 TAC Chapter 116, SubChapter B 116.115(b)(2)(F)
30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)

Rqmt Prov: General Terms and Conditions OP
Special Condition 1 PERMIT
Special Condition 17 OP
Special Condition 19 OP

Description: Failed to prevent unauthorized emissions. Specifically, the Respondent released 2,966 lbs of VOC, 2,149 lbs of CO, and 297 lbs of NOx from the PO Ground Flare, EPN POFLARE, 1,357 lbs of VOC, 2,936 lbs of CO, and 368 lbs of NOx from Flare No. 3, EPN UER037, and 607 lbs of CO, and 39 lbs of NOx collectively from Flare No. 1, EPN UER044, and Flare No. 2, EPN UER046, during an emissions event (Incident No. 239362) that began on July 19, 2016 and lasted for 48 hours.

Classification: Moderate

Citation: 30 TAC Chapter 116, SubChapter B 116.115(b)(2)(F)
30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)

Rqmt Prov: General Terms and Conditions OP
Special Condition 1 PERMIT
Special Condition 19 OP

Description: Failed to prevent unauthorized emissions. Specifically, the Respondent released 148.98 lbs of NOx and 301.63 lbs of CO from Flare Nos. 1 and 2, EPNs UER046 and UER044, respectively, and 1,580.26 lbs of VOC, 405.83 lbs of NOx, and 3,237 lbs of CO from Flare No. 3, EPN UER037, during an emissions event (Incident No. 242417) that began on August 28, 2016 and lasted for 14 hours and 39 minutes.

Classification: Moderate

Citation: 30 TAC Chapter 116, SubChapter B 116.115(b)(2)(F)
30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)

Rqmt Prov: General Terms and Conditions OP
Special Condition 1 PERMIT
Special Condition 13 PERMIT
Special Condition 19 OP

Description: Failed to prevent unauthorized emissions. Specifically, the Respondent released 5,416 lbs of VOC from the F-A3-103 DeMethanizer Pressure Relief Valve ("PRV") during an emissions event (Incident No. 242427) that began on August 28, 2016 and lasted eight minutes.

Classification: Moderate

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

30 TAC Chapter 122, SubChapter B 122.143(4)

Rqmt Prov: General Terms and Conditions OP

Special Condition 1 PERMIT

Special Condition 14 OP

Description: Failed to prevent unauthorized emissions. Specifically, the Respondent released 22,191 lbs of VOC from the F8 Ethylene Oxide Unit during emissions events (Incident Nos. 233310, 233312, and 233329) that occurred on May 15, 2016 and lasted one hour and 47 minutes and occurred on May 16, 2016 and lasted one hour and 27 minutes.

Classification: Moderate

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

Rqmt Prov: General Terms and Conditions OP

Special Condition 19 OP

Special Condition 28B PERMIT

Description: Failure to maintain the average annual flow rate for the North and Center Flares below permitted limits.

4 Effective Date: 11/28/2022 ADMINORDER 2020-1274-AIR-E (1660 Order-Agreed Order With Denial)

Classification: Moderate

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

30 TAC Chapter 122, SubChapter B 122.143(4)

5C THSC Chapter 382 382.085(b)

Rqmt Prov: NSR 20160 Special Condition 1 PERMIT

O3056 General Terms and Conditions OP

O3056 Special Condition 17 OP

Description: Failure to prevent unauthorized emissions. The Respondent released 13,459 pounds ("lbs") of volatile organic compounds ("VOC") and 41 lbs of acetone as fugitive emissions, during an emissions event (Incident No. 335200) that occurred on May 7, 2020 and lasted 15 minutes. The emissions event occurred due to an open bleeder valve in the TBA flush system and excessive vibration from excessive and cyclic flow through the TBA flush line that caused the plug on the bleeder valve to come off.

Classification: Moderate

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

30 TAC Chapter 122, SubChapter B 122.143(4)

5C THSC Chapter 382 382.085(b)

Rqmt Prov: FOP O13056 Special Condition 17 OP

FOP O3056 General Terms and Conditions OP

NSR 20160 Special Condition 1 PERMIT

Description: Failure to prevent unauthorized emissions. The Respondent released 3,759.78 lbs of VOC, 380.36 lbs of NOx, 35 lbs of acetone, and 2,771.66 lbs of CO from the Propylene Oxide ("PO") Ground Flare, EPN POFLARE, during an emissions event (Incident No. 335589) that began on May 16, 2020 and lasted 26 hours and two minutes. The emissions event occurred due to fouling in the float chamber of Level Controller Transmitter LT-2752 to fail and Compressor C-005 to safely shut down, resulting in flaring.

Classification: Moderate

Citation: 30 TAC Chapter 101, SubChapter F 101.201(b)(1)(F)

30 TAC Chapter 122, SubChapter B 122.143(4)

5C THSC Chapter 382 382.085(b)

Rqmt Prov: FOP O3056 General Terms and Conditions OP

FOP O3056 Special Condition 2F OP

Description: Failure to identify all required information on the final record for a reportable emissions event. The Respondent reported a duration of 37 hours and two minutes on the final record for Incident No. 335589, but after further review and investigation, the Respondent determined that the full duration of the emissions event was 26 hours and 2 mins.

Classification: Moderate

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

30 TAC Chapter 122, SubChapter B 122.143(4)

5C THSC Chapter 382 382.085(b)

Rqmt Prov: FOP O1320 General Terms and Conditions OP

FOP O1320 Special Condition 15 OP

FOP O3056 General Terms and Conditions OP

FOP O3056 Special Condition 17 OP

NSR 106169 Special Condition 1 PERMIT

NSR 20160 Special Condition 1 PERMIT

NSR 5952A Special Condition 1 PERMIT

NSR 5972A Special Condition 1 PERMIT

Description: Failure to prevent unauthorized emissions. The Respondent released 289.72 lbs of VOC, 70.66 lbs of NOx, 516.89 lbs of CO, and 17.72 lbs of acetone from the PO Ground Flare, EPN POFLARE, and 17,253.34 lbs of VOC as fugitive emissions from the F4 Unit (3,702.85 lbs), the F6 Unit (7,109.53 lbs), and the F8 Unit (6,440.96 lbs), during an emissions

event (Incident No. 343692) that began on October 9, 2020 and lasted eight hours. The emissions event occurred due to an area-wide power interruption

See addendum for information regarding federal actions.

B. Criminal convictions:

N/A

C. Chronic excessive emissions events:

N/A

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

Item 1	February 12, 2018	(1465800)	Item 32	March 25, 2020	(1647163)
Item 2	May 01, 2018	(1482263)	Item 33	April 03, 2020	(1632892)
Item 3	June 14, 2018	(1474203)	Item 34	April 10, 2020	(1632873)
Item 4	June 25, 2018	(1498328)	Item 35	May 08, 2020	(1646490)
Item 5	July 02, 2018	(1499106)	Item 36	June 22, 2020	(1666590)
Item 6	August 06, 2018	(1497881)	Item 38	August 14, 2020	(1664481)
Item 7	August 14, 2018	(1500326)	Item 39	August 18, 2020	(1666259)
Item 8	August 20, 2018	(1474362)	Item 40	October 14, 2020	(1666267)
Item 9	August 21, 2018	(1507534)	Item 41	October 27, 2020	(1684137)
Item 10	September 24, 2018	(1527233)	Item 42	January 15, 2021	(1690222)
Item 11	November 05, 2018	(1525865)	Item 43	May 30, 2021	(1705313)
Item 12	November 15, 2018	(1526096)	Item 44	June 03, 2021	(1705331)
Item 13	November 19, 2018	(1541426)	Item 45	June 04, 2021	(1706401)
Item 14	December 18, 2018	(1545210)	Item 46	June 08, 2021	(1706652)
Item 15	December 27, 2018	(1537332)	Item 47	June 09, 2021	(1706708)
Item 16	January 22, 2019	(1539063)	Item 48	June 25, 2021	(1735131)
Item 17	February 22, 2019	(1540687)	Item 49	November 08, 2021	(1765078)
Item 18	February 26, 2019	(1550024)	Item 50	November 16, 2021	(1762383)
Item 19	March 19, 2019	(1559604)	Item 51	November 22, 2021	(1783603)
Item 20	April 08, 2019	(1554750)	Item 52	December 07, 2021	(1764498)
Item 21	April 25, 2019	(1571807)	Item 53	December 24, 2021	(1790627)
Item 22	May 08, 2019	(1555583)	Item 54	January 20, 2022	(1798422)
Item 23	May 15, 2019	(1552240)	Item 55	February 17, 2022	(1782346)
Item 24	June 25, 2019	(1576172)	Item 56	March 14, 2022	(1782372)
Item 25	June 26, 2019	(1583224)	Item 58	May 20, 2022	(1817383)
Item 26	October 22, 2019	(1603077)	Item 59	October 20, 2022	(1804094)
Item 27	November 13, 2019	(1605757)	Item 60	November 04, 2022	(1853646)
Item 28	November 18, 2019	(1605647)	Item 62	November 18, 2022	(1859919)
Item 29	November 20, 2019	(1619031)	Item 63	December 16, 2022	(1866706)
Item 30	January 24, 2020	(1634024)	Item 64	December 20, 2022	(1866347)
Item 31	February 25, 2020	(1640643)	Item 65	January 02, 2023	(1867211)

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: 01/31/2022 (1806297)
 Self Report? YES Classification: Moderate
 Citation: 2D TWC Chapter 26, SubChapter A 26.121(a)
 30 TAC Chapter 305, SubChapter F 305.125(1)
 Description: Failure to meet the limit for one or more permit parameter

- 2 Date: 02/28/2022 (1813362)
 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

- 3 Date: 02/28/2022 (1774849)
 Self Report? NO Classification: Moderate
 Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
 30 TAC Chapter 122, SubChapter B 122.143(4)
 5C THSC Chapter 382 382.085(b)
 FOP O2286 General Terms and Conditions OP

Description: Failure to comply with permit conditions regarding the use of compounds. EIC
B18(g)(1) Mod 2D

- 4 Date: 03/31/2022 (1819934)
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: 04/01/2022 (1796299)
Self Report? NO Classification: Minor
Citation: DSPC, Pg. 3, No. 2(a) PERMIT
Description: Failure by Indorama Ventures Propylene Oxides, LLC - Port Neches Operation
(Indorama) to calibrate the flow meter at least annually to ensure accuracy.
Self Report? NO Classification: Minor
Citation: OpR, Pg. 11, No. 1 PERMIT
Description: Failure by Indorama Ventures Propylene Oxides, LLC - Port Neches Operation
(Indorama) to properly operate and maintain all systems of collection, treatment,
and disposal.
Self Report? NO Classification: Minor
Citation: OpR, Pg. 11, No. 1 PERMIT
Description: Failure by Indorama Ventures Propylene Oxides, LLC - Port Neches Operation
(Indorama) to properly operate and maintain all systems of collection, treatment,
and disposal.
Self Report? NO Classification: Minor
Citation: OpR, Pg. 11, No. 1 PERMIT
Description: Failure by Indorama Ventures Propylene Oxides, LLC - Port Neches Operation
(Indorama) to properly operate and maintain all systems of collection, treatment,
and disposal.
Self Report? NO Classification: Minor
Citation: MRR 7(c) PERMIT
Description: Failure by Indorama Ventures Oxides to report any effluent violation that deviates
from the permitted effluent limitation by more than 40% in writing to the
Regional Office and the Enforcement Division (MC 224) within 5 working days of
becoming aware of the noncompliance.
Self Report? NO Classification: Minor
Citation: MRR 3(c)(i) PERMIT
Description: Failure by Indorama Ventures Oxides (Indorama) to maintain records of
monitoring activities.
Self Report? NO Classification: Minor
Citation: MRR 3(c)(iii) PERMIT
Description: Failure by Indorama Ventures Oxides (Indorama) to maintain records of
monitoring activities.
Self Report? NO Classification: Minor
Citation: MRR 2(a) PERMIT
Description: Failure by Indorama Ventures Oxides to comply with test procedures specified in
30 TAC 319.11 - 319.12.
Self Report? NO Classification: Minor
Citation: MRR 2(a) PERMIT
Description: Failure by Indorama Ventures Oxides to comply with test procedures specified in
30 TAC 319.11 - 319.12.
Self Report? NO Classification: Minor
Citation: MRR 3(c)(vi) PERMIT
Description: Failure by Indorama Ventures Oxides to maintain records of monitoring activities.
Self Report? NO Classification: Minor
Citation: MRR 3(a) PERMIT
Description: Failure by Indorama Ventures Oxides to obtain measurements at times and in a
manner so as to be representative of the monitored activity.
Self Report? NO Classification: Minor
Citation: MRR 3(c)(vi) PERMIT
Description: Failure by Indorama Ventures Oxides to maintain records of monitoring activities.
Self Report? NO Classification: Minor
Citation: MRR 2(a) PERMIT
Description: Failure by Indorama Ventures Oxides to comply with test procedures 30 TAC
319.11 - 319.12.
Self Report? NO Classification: Moderate
Citation: ELMR 3 PERMIT
PC 2(d) PERMIT

Description: Failure by Indorama Ventures Oxides to take all reasonable steps to prevent a discharge that had a reasonable likelihood of adversely affecting human health or the environment which resulted in the discharge of visible oil.
 Self Report? NO Classification: Minor
 Citation: OpR 11(f) PERMIT

Description: Failure by Indorama Ventures Oxides to make records readily available for review by authorized representatives of the TCEQ.
 Self Report? NO Classification: Minor
 Citation: OpR 1 PERMIT

Description: Failure by Indorama Ventures Oxides to properly operate and maintain units of collection, treatment, and disposal.
 Self Report? NO Classification: Minor
 Citation: MRR 3(c)(i) PERMIT

Description: Failure by Indorama Ventures Oxides to maintain records of monitoring activities.
 Self Report? NO Classification: Moderate
 Citation: ELMR 1 PERMIT

Description: Failure by Indorama Ventures Oxides to discharge compliant effluent for oil and grease through Outfall 008.
 Self Report? NO Classification: Moderate
 Citation: ELMR 1 PERMIT

Description: Failure by Indorama Ventures Oxides to discharge compliant effluent for chemical oxygen demand at Outfall 301.
 Self Report? NO Classification: Moderate
 Citation: OT 2 PERMIT

Description: Failure by Indorama Ventures Oxides to report orally or by facsimile within 24 hours of becoming aware of the violation and a written report within five working days to the TCEQ Region 10 and the Enforcement Division (MC 224) when exceeding the daily maximum limitation of zinc.
 Self Report? NO Classification: Minor
 Citation: MRR 3(c)(v) PERMIT

Description: Failure Indorama Ventures Oxides to maintain records of monitoring activities.

6 Date: 04/30/2022 (1828774)
 Self Report? YES Classification: Moderate
 Citation: 2D TWC Chapter 26, SubChapter A 26.121(a)
 30 TAC Chapter 305, SubChapter F 305.125(1)
 Description: Failure to meet the limit for one or more permit parameter

7 Date: 05/31/2022 (1835064)
 Self Report? YES Classification: Moderate
 Citation: 2D TWC Chapter 26, SubChapter A 26.121(a)
 30 TAC Chapter 305, SubChapter F 305.125(1)
 Description: Failure to meet the limit for one or more permit parameter

8 Date: 06/30/2022 (1842270)
 Self Report? YES Classification: Moderate
 Citation: 2D TWC Chapter 26, SubChapter A 26.121(a)
 30 TAC Chapter 305, SubChapter F 305.125(1)
 Description: Failure to meet the limit for one or more permit parameter

9 Date: 07/31/2022 (1848404)
 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

10 Date: 08/10/2022 (1832699)
 Self Report? NO Classification: Moderate
 Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
 30 TAC Chapter 122, SubChapter B 122.143(4)
 5C THSC Chapter 382 382.085(b)
 FOP O2288 GTC OP
 FOP O2288 SC 19 OP
 NSR 19823 SC 25F PERMIT
 Description: Failure to maintain wastewater carbon bed Volatile Organic Compounds (VOC) concentrations below permitted limits. EIC B18(g)(1) Mod 2D
 Self Report? NO Classification: Moderate
 Citation: 30 TAC Chapter 101, SubChapter A 101.20(3)
 30 TAC Chapter 116, SubChapter B 116.115(c)

30 TAC Chapter 122, SubChapter B 122.143(4)
 5C THSC Chapter 382 382.085(b)
 FOP O2288 GTC OP
 FOP O2288 SC 19 OP
 NSR 16909 & PSDTX780 SC 1 PERMIT
 NSR 16909 & PSDTX780 SC 4 PERMIT
 Description: Failure to comply with permitted emissions rates for the Cogen Unit 1, EPN CG1.
 EIC B18(g)(1) Mod 2D
 Self Report? NO Classification: Moderate
 Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
 30 TAC Chapter 122, SubChapter B 122.143(4)
 5C THSC Chapter 382 382.085(b)
 FOP O2288 GTC OP
 FOP O2288 SC 19 OP
 NSR 19823 SC 19B PERMIT
 Description: Failure to maintain Cooling Tower EPN CT-4 Total Dissolved Solids (TDS) below
 permitted limits. EIC B18(g)(1) Mod 2D
 Self Report? NO Classification: Moderate
 Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
 30 TAC Chapter 122, SubChapter B 122.143(4)
 5C THSC Chapter 382 382.085(b)
 FOP O2288 GTC OP
 FOP O2288 SC 19 OP
 NSR 19823 SC 10F PERMIT
 Description: Failure to maintain flare heat inputs below the maximum combined limit for the
 North/Center Flares, EPNs UER044 and UER046, as required. EIC B18(g)(1)
 Mod 2D
 Self Report? NO Classification: Moderate
 Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
 30 TAC Chapter 122, SubChapter B 122.143(4)
 5C THSC Chapter 382 382.085(b)
 FOP O2288 GTC OP
 FOP O2288 SC 19 OP
 NSR 19823 SC 10F PERMIT
 Description: Failure to maintain flare heat inputs below the maximum limit for the South Flare,
 EPN UER037, as required. EIC B18(g)(1) Mod 2D
 Self Report? NO Classification: Moderate
 Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
 30 TAC Chapter 122, SubChapter B 122.143(4)
 5C THSC Chapter 382 382.085(b)
 FOP O2288 GTC OP
 FOP O2288 SC 19 OP
 NSR 19823 SC 1 PERMIT
 NSR 19823 SC 13A PERMIT
 NSR 19823 SC 8 PERMIT
 Description: Failure to comply with permitted emissions rates for the Waste Heat Boiler, EPN
 A3HA35. EIC B18(g)(1) Mod 2D
 Self Report? NO Classification: Moderate
 Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
 30 TAC Chapter 122, SubChapter B 122.143(4)
 5C THSC Chapter 382 382.085(b)
 FOP O2288 GTC OP
 FOP O2288 SC 19 OP
 NSR 49247 SC 3 PERMIT
 Description: Failure to maintain the minimum concentration in the aeration basins as required.
 EIC B18(g)(1) Mod 2D
 Self Report? NO Classification: Moderate
 Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
 30 TAC Chapter 122, SubChapter B 122.143(4)
 40 CFR Chapter 60, SubChapter C, PT 60, SubPT A 60.18(c)(3)(ii)
 5C THSC Chapter 382 382.085(b)
 FOP O2288 GTC OP
 FOP O2288 SC 19 OP
 FOP O2288 SC 1A OP
 NSR 19823 SC 10A PERMIT
 Description: Failure to maintain the minimum heating value for the South Flare, EPN UER037.
 EIC B18(g)(1) Mod 2D
 Self Report? NO Classification: Moderate
 Citation: 30 TAC Chapter 122, SubChapter B 122.143(4)
 30 TAC Chapter 122, SubChapter B 122.145(2)(A)
 5C THSC Chapter 382 382.085(b)
 FOP O2288 GTC OP
 Description: Failure to report deviations on a deviation report. EIC B3 MOD 2G

11 Date: 08/15/2022 (1833534)
Self Report? NO Classification: Moderate
Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)
5C THSC Chapter 382 382.085(b)
FOP O1320 SC 16 OP
NSR 5952A SC 14B PERMIT
O1320 GTC OP
Description: Failure to maintain the F6 Incinerator within the permitted temperature limit as required. EIC B18(g)(1) Mod 2D
Self Report? NO Classification: Moderate
Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)
5C THSC Chapter 382 382.085(b)
FOP O1320 GTC PERMIT
FOP O1320 SC 16 OP
NSR 5972A SC 4 PERMIT
Description: Failure to maintain the F4 Incinerator within the permitted temperature limit as required. EIC B18(g)(1) Mod 2D
Self Report? NO Classification: Moderate
Citation: 30 TAC Chapter 122, SubChapter B 122.143(4)
30 TAC Chapter 122, SubChapter B 122.145(2)(A)
5C THSC Chapter 382 382.085(b)
O1320 GTC OP
Description: Failure to report deviations on a deviation report. EIC B3 MOD 2G

12 Date: 08/30/2022 (1833615)
Self Report? NO Classification: Moderate
Citation: 30 TAC Chapter 116, SubChapter B 116.115(b)(2)(F)
30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)
5C THSC Chapter 382 382.085(b)
NSR 20160 SC 1 PERMIT
NSR 20160 SC 10A PERMIT
NSR 20160 SC 10D PERMIT
O3056 GTC OP
O3056 SC 17 OP
Description: Failure to comply with permitted emissions rates for Boilers H-K2-001 and H-K2-002, EPN STEAMGEN. EIC B18(g)(1) Mod 2D
Self Report? NO Classification: Moderate
Citation: 30 TAC Chapter 116, SubChapter B 116.115(b)(2)(F)
30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)
5C THSC Chapter 382 382.085(b)
FOP O3056 GTC OP
FOP O3056 SC 17 OP
NSR 20160 SC 1 PERMIT
NSR 20160 SC 12E PERMIT
SC 12B PERMIT
Description: Failure to comply with permitted emissions rates for Boiler H-K2-003, EPN HK-F5-003. EIC B18(g)(1) Mod 2D
Self Report? NO Classification: Moderate
Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)
5C THSC Chapter 382 382.085(b)
FOP O3056 GTC OP
FOP O3056 SC 17 OP
NSR 20160 SC 14A PERMIT
NSR 20160 SC 14I PERMIT
Description: Failure to comply with permitted emissions rates for Boiler H-K2-004, EPN HK-F5-004. EIC B18(g)(1) Mod 2D
Self Report? NO Classification: Moderate
Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)
40 CFR Chapter 60, SubChapter C, PT 60, SubPT Kb 60.113b(a)(2)
5C THSC Chapter 382 382.085(b)
FOP O3056 GTC OP
FOP O3056 SC 17 OP
FOP O3056 SC 1A OP
NSR 20160 SC 30B PERMIT
Description: Failure to conduct an annual inspection on a floating roof tank as required. EIC B18(g)(1) Mod 2D

Self Report? NO Classification: Moderate
Citation: 30 TAC Chapter 106, SubChapter A 106.4(a)(6)
30 TAC Chapter 116, SubChapter B 116.115(b)
30 TAC Chapter 122, SubChapter B 122.143(4)
5C THSC Chapter 382 382.085(b)
FOP O3056 GTC OP
FOP O3056 SC 18 OP
PBR 161628 GTC PERMIT
Description: Failure to submit notification of tank construction on time as required. EIC B3
Mod 2B

Self Report? NO Classification: Moderate
Citation: 30 TAC Chapter 122, SubChapter B 122.143(4)
30 TAC Chapter 122, SubChapter B 122.145(2)(A)
5C THSC Chapter 382 382.085(b)
FOP O3056 GTC OP
Description: Failure to report deviations on a deviation report as required. EIC B3 MOD
2G

Self Report? NO Classification: Moderate
Citation: 30 TAC Chapter 101, SubChapter F 101.201(b)(2)
30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)
5C THSC Chapter 382 382.085(b)
FOP O3056 GTC OP
FOP O3056 SC 17 OP
FOP O3056 SC 2F OP
NSR 20160 GTC 9 PERMIT
Description: Failure to create an accurate final record of non-reportable emissions events. EIC
B3 Mod 2B

13 Date: 08/31/2022 (1856200)
Self Report? YES Classification: Moderate

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

14 Date: 09/30/2022 (1862558)
Self Report? YES Classification: Moderate

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

F. Environmental audits:

Notice of Intent Date: 09/27/2019 (1602679)

Disclosure Date: 12/18/2019

Viol. Classification: Moderate

Citation: 30 TAC Chapter 101, SubChapter A 101.20(2)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT A 63.10(b)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT G 63.151(j)

Description: Failed to report and maintain documentation for updated Hazardous Organic NESHAP (HON) applicability for F4, F6, and F5 operating units.

Viol. Classification: Moderate

Citation: 30 TAC Chapter 101, SubChapter A 101.20(2)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT F 63.100
40 CFR Chapter 63, SubChapter C, PT 63, SubPT G 63.151(j)

Description: Failed to update the Notification of Compliance Status to reflect revised applicability for F4, F6, and F5 operating units.

Viol. Classification: Moderate

Citation: 30 TAC Chapter 101, SubChapter A 101.20(2)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT A 63.10(b)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT G 63.151(j)

Description: Failed to report and maintain detailed applicability documentation for group status determinations of the F8 operating unit.

Viol. Classification: Moderate

Citation: 30 TAC Chapter 101, SubChapter A 101.20(2)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT G 63.152(b)

Description: Failed to update and submit Notice of Compliance Status documentation for the F8 operating unit.

Viol. Classification: Moderate

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

- 40 CFR Chapter 63, SubChapter C, PT 63, SubPT G 63.115
- 40 CFR Chapter 63, SubChapter C, PT 63, SubPT G 63.115(a)
- 40 CFR Chapter 63, SubChapter C, PT 63, SubPT G 63.115(b)
- 40 CFR Chapter 63, SubChapter C, PT 63, SubPT G 63.115(c)
- 40 CFR Chapter 63, SubChapter C, PT 63, SubPT G 63.115(d)
- 40 CFR Chapter 63, SubChapter C, PT 63, SubPT G 63.115(e)
- 40 CFR Chapter 63, SubChapter C, PT 63, SubPT G 63.115(f)

Description: Failed to maintain consistent documentation for the CO2 Vents associated with F4, F6, and F8 operating units and which adequately demonstrates Group 2 status as required.

Viol. Classification: Moderate

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

Rqmt Prov: PERMIT General Condition 1
PERMIT General Requirements 1

Description: Failed to provide accurate permit representations. Specifically, permitted maximum emissions rates for CO2 vents and wastewater fugitives are higher than actual emissions and do not align with existing Hazardous Organic NESHAP applicability determinations.

Viol. Classification: Moderate

Citation: 30 TAC Chapter 101, SubChapter A 101.20(2)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT G 63.132(a)(1)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT G 63.132(c)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT G 63.144(b)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT G 63.144(c)

Description: Failed to maintain detailed applicability documentation for several Hazardous Organic NESHAP wastewater Points of Determination.

Viol. Classification: Moderate

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

40 CFR Part 63, Subpart G 63.132(a)(2)(i)

Description: Failed to identify all Hazardous Organic NESHAP waste management units managing HON Group 1 Wastewater Streams.

Viol. Classification: Moderate

Citation: 30 TAC Chapter 101, SubChapter A 101.20(2)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT G 63.143(a)

Description: Failed to update documentation for Table 11 semiannual inspections for HON waste management units.

Viol. Classification: Moderate

Citation: 30 TAC Chapter 101, SubChapter A 101.20(2)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT G 63.148(i)

Description: Failed to update documentation for annual visual inspections for HON closed vent systems.

Viol. Classification: Moderate

Citation: 30 TAC Chapter 101, SubChapter A 101.20(2)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT G 63.110(d)

Description: Failed to prevent an incorrect application of overlap for process vents between 40 CFR Part 60, NSPS NNN/RRR and 40 CFR Part 63, Subparts F and G.

G. Type of environmental management systems (EMSs):

N/A

H. Voluntary on-site compliance assessment dates:

N/A

I. Participation in a voluntary pollution reduction program:

N/A

J. Early compliance:

N/A

Sites Outside of Texas:

N/A



Compliance History Report

Compliance History Report for CN602266173, RN100219252, Rating Year 2022 which includes Compliance History (CH) components from September 1, 2017, through August 31, 2022.

Customer, Respondent, or Owner/Operator:	CN602266173, Indorama Ventures Oxides International LLC	Classification:	SATISFACTORY	Rating:	3.08
Regulated Entity:	RN100219252, PORT NECHES OPERATIONS	Classification:	SATISFACTORY	Rating:	3.08
Complexity Points:	47	Repeat Violator:	NO		
CH Group:	05 - Chemical Manufacturing				
Location:	2701 Spur 136 in Port Neches, Jefferson County, Texas				
TCEQ Region:	REGION 10 - BEAUMONT				

ID Number(s):

AIR OPERATING PERMITS ACCOUNT NUMBER JE0052V
AIR OPERATING PERMITS PERMIT 2286
AIR OPERATING PERMITS PERMIT 2288
AIR NEW SOURCE PERMITS AFS NUM 4824500006
AIR NEW SOURCE PERMITS REGISTRATION 51736
AIR NEW SOURCE PERMITS REGISTRATION 54551
AIR NEW SOURCE PERMITS REGISTRATION 44034
AIR NEW SOURCE PERMITS REGISTRATION 45090
AIR NEW SOURCE PERMITS REGISTRATION 45277
AIR NEW SOURCE PERMITS REGISTRATION 47065
AIR NEW SOURCE PERMITS REGISTRATION 47555
AIR NEW SOURCE PERMITS REGISTRATION 47887
AIR NEW SOURCE PERMITS REGISTRATION 48176
AIR NEW SOURCE PERMITS REGISTRATION 49493
AIR NEW SOURCE PERMITS PERMIT 647B
AIR NEW SOURCE PERMITS PERMIT 5952A
AIR NEW SOURCE PERMITS REGISTRATION 7761
AIR NEW SOURCE PERMITS PERMIT 19823
AIR NEW SOURCE PERMITS PERMIT 20160
AIR NEW SOURCE PERMITS REGISTRATION 31443
AIR NEW SOURCE PERMITS REGISTRATION 36453
AIR NEW SOURCE PERMITS REGISTRATION 40103
AIR NEW SOURCE PERMITS REGISTRATION 41444
AIR NEW SOURCE PERMITS REGISTRATION 41757
AIR NEW SOURCE PERMITS REGISTRATION 42153
AIR NEW SOURCE PERMITS REGISTRATION 75597
AIR NEW SOURCE PERMITS REGISTRATION 75748
AIR NEW SOURCE PERMITS REGISTRATION 55753
AIR NEW SOURCE PERMITS PERMIT 56390
AIR NEW SOURCE PERMITS REGISTRATION 70571
AIR NEW SOURCE PERMITS REGISTRATION 70726
AIR NEW SOURCE PERMITS REGISTRATION 56073
AIR NEW SOURCE PERMITS REGISTRATION 54219
AIR NEW SOURCE PERMITS REGISTRATION 72310
AIR NEW SOURCE PERMITS REGISTRATION 54570
AIR NEW SOURCE PERMITS REGISTRATION 71751
AIR NEW SOURCE PERMITS REGISTRATION 50360
AIR NEW SOURCE PERMITS REGISTRATION 72907
AIR NEW SOURCE PERMITS REGISTRATION 75203
AIR NEW SOURCE PERMITS REGISTRATION 76732
AIR NEW SOURCE PERMITS REGISTRATION 78974

AIR OPERATING PERMITS PERMIT 1320
AIR OPERATING PERMITS PERMIT 2287
AIR OPERATING PERMITS PERMIT 3056
AIR NEW SOURCE PERMITS PERMIT 29516
AIR NEW SOURCE PERMITS REGISTRATION 52715
AIR NEW SOURCE PERMITS REGISTRATION 54565
AIR NEW SOURCE PERMITS REGISTRATION 44434
AIR NEW SOURCE PERMITS REGISTRATION 45094
AIR NEW SOURCE PERMITS REGISTRATION 46791
AIR NEW SOURCE PERMITS REGISTRATION 47066
AIR NEW SOURCE PERMITS REGISTRATION 47577
AIR NEW SOURCE PERMITS REGISTRATION 48178
AIR NEW SOURCE PERMITS PERMIT 49247
AIR NEW SOURCE PERMITS ACCOUNT NUMBER JE0052V
AIR NEW SOURCE PERMITS PERMIT 5807A
AIR NEW SOURCE PERMITS PERMIT 5972A
AIR NEW SOURCE PERMITS PERMIT 16909
AIR NEW SOURCE PERMITS PERMIT 20134
AIR NEW SOURCE PERMITS REGISTRATION 23568
AIR NEW SOURCE PERMITS PERMIT 36646
AIR NEW SOURCE PERMITS REGISTRATION 39725
AIR NEW SOURCE PERMITS REGISTRATION 40527
AIR NEW SOURCE PERMITS REGISTRATION 41301
AIR NEW SOURCE PERMITS REGISTRATION 42103
AIR NEW SOURCE PERMITS REGISTRATION 42154
AIR NEW SOURCE PERMITS REGISTRATION 76018
AIR NEW SOURCE PERMITS PERMIT 83816
AIR NEW SOURCE PERMITS REGISTRATION 70024
AIR NEW SOURCE PERMITS REGISTRATION 56243
AIR NEW SOURCE PERMITS REGISTRATION 70781
AIR NEW SOURCE PERMITS REGISTRATION 53551
AIR NEW SOURCE PERMITS REGISTRATION 70011
AIR NEW SOURCE PERMITS REGISTRATION 53979
AIR NEW SOURCE PERMITS REGISTRATION 54231
AIR NEW SOURCE PERMITS REGISTRATION 54234
AIR NEW SOURCE PERMITS REGISTRATION 52077
AIR NEW SOURCE PERMITS REGISTRATION 73663
AIR NEW SOURCE PERMITS REGISTRATION 74296
AIR NEW SOURCE PERMITS REGISTRATION 75202
AIR NEW SOURCE PERMITS REGISTRATION 77129
AIR NEW SOURCE PERMITS REGISTRATION 79529

AIR NEW SOURCE PERMITS REGISTRATION 80149
AIR NEW SOURCE PERMITS REGISTRATION 81531
AIR NEW SOURCE PERMITS REGISTRATION 82922
AIR NEW SOURCE PERMITS EPA PERMIT PSDTX780
AIR NEW SOURCE PERMITS REGISTRATION 139463
AIR NEW SOURCE PERMITS REGISTRATION 110757
AIR NEW SOURCE PERMITS REGISTRATION 110787
AIR NEW SOURCE PERMITS REGISTRATION 110808
AIR NEW SOURCE PERMITS REGISTRATION 150790
AIR NEW SOURCE PERMITS REGISTRATION 153791
AIR NEW SOURCE PERMITS REGISTRATION 152840
AIR NEW SOURCE PERMITS REGISTRATION 154036
AIR NEW SOURCE PERMITS REGISTRATION 164694
AIR NEW SOURCE PERMITS REGISTRATION 168479
AIR NEW SOURCE PERMITS REGISTRATION 169413
AIR NEW SOURCE PERMITS REGISTRATION 164877
AIR NEW SOURCE PERMITS REGISTRATION 167574
AIR NEW SOURCE PERMITS REGISTRATION 170963
AIR NEW SOURCE PERMITS REGISTRATION 163874
AIR NEW SOURCE PERMITS REGISTRATION 142196
AIR NEW SOURCE PERMITS REGISTRATION 148227
AIR NEW SOURCE PERMITS REGISTRATION 150168
AIR NEW SOURCE PERMITS REGISTRATION 156133
AIR NEW SOURCE PERMITS REGISTRATION 155871
AIR NEW SOURCE PERMITS REGISTRATION 160459
AIR NEW SOURCE PERMITS REGISTRATION 155472
AIR NEW SOURCE PERMITS REGISTRATION 161628
AIR NEW SOURCE PERMITS REGISTRATION 152402
AIR NEW SOURCE PERMITS REGISTRATION 155384
AIR NEW SOURCE PERMITS REGISTRATION 155634
PETROLEUM STORAGE TANK REGISTRATION
REGISTRATION 40711
IHW CORRECTIVE ACTION SOLID WASTE REGISTRATION
(SWR) 30029
WASTEWATER EPA ID TX0005070
POLLUTION PREVENTION PLANNING ID NUMBER
P00679
INDUSTRIAL AND HAZARDOUS WASTE PERMIT 50363

INDUSTRIAL AND HAZARDOUS WASTE EPA ID
TXD008076846
TAX RELIEF ID NUMBER 17954
TAX RELIEF ID NUMBER 17984
TAX RELIEF ID NUMBER 17095
TAX RELIEF ID NUMBER 17093
TAX RELIEF ID NUMBER 17940
TAX RELIEF ID NUMBER 17977
TAX RELIEF ID NUMBER 18835
TAX RELIEF ID NUMBER 17985
TAX RELIEF ID NUMBER 24379

AIR NEW SOURCE PERMITS REGISTRATION 80702
AIR NEW SOURCE PERMITS REGISTRATION 81415
AIR NEW SOURCE PERMITS REGISTRATION 92256
AIR NEW SOURCE PERMITS REGISTRATION 91994
AIR NEW SOURCE PERMITS PERMIT 106169
AIR NEW SOURCE PERMITS REGISTRATION 109215
AIR NEW SOURCE PERMITS REGISTRATION 110809
AIR NEW SOURCE PERMITS REGISTRATION 110813
AIR NEW SOURCE PERMITS REGISTRATION 150484
AIR NEW SOURCE PERMITS REGISTRATION 150307
AIR NEW SOURCE PERMITS REGISTRATION 152982
AIR NEW SOURCE PERMITS REGISTRATION 163020
AIR NEW SOURCE PERMITS REGISTRATION 169507
AIR NEW SOURCE PERMITS REGISTRATION 164604
AIR NEW SOURCE PERMITS REGISTRATION 166541
AIR NEW SOURCE PERMITS REGISTRATION 167060
AIR NEW SOURCE PERMITS REGISTRATION 170571
AIR NEW SOURCE PERMITS REGISTRATION 169228
AIR NEW SOURCE PERMITS REGISTRATION 166117
AIR NEW SOURCE PERMITS REGISTRATION 151107
AIR NEW SOURCE PERMITS REGISTRATION 143027
AIR NEW SOURCE PERMITS REGISTRATION 150992
AIR NEW SOURCE PERMITS PERMIT 79802
AIR NEW SOURCE PERMITS REGISTRATION 160594
AIR NEW SOURCE PERMITS REGISTRATION 159322
AIR NEW SOURCE PERMITS REGISTRATION 161151
AIR NEW SOURCE PERMITS REGISTRATION 157572
AIR NEW SOURCE PERMITS REGISTRATION 160045
AIR NEW SOURCE PERMITS REGISTRATION 160606
AIR NEW SOURCE PERMITS REGISTRATION 171239
PETROLEUM STORAGE TANK REGISTRATION
REGISTRATION 79935
WASTEWATER PERMIT WQ0000511000

AIR EMISSIONS INVENTORY ACCOUNT NUMBER JE0052V
INDUSTRIAL AND HAZARDOUS WASTE PERMIT 50055

INDUSTRIAL AND HAZARDOUS WASTE EPA ID
TX0000201202
INDUSTRIAL AND HAZARDOUS WASTE SOLID WASTE
REGISTRATION # (SWR) 30029
TAX RELIEF ID NUMBER 17974
TAX RELIEF ID NUMBER 17986
TAX RELIEF ID NUMBER 17100
TAX RELIEF ID NUMBER 17975
TAX RELIEF ID NUMBER 17983
TAX RELIEF ID NUMBER 18840
TAX RELIEF ID NUMBER 17970
TAX RELIEF ID NUMBER 17088

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

Date Compliance History Report Prepared: January 10, 2023

Agency Decision Requiring Compliance History: Enforcement

Component Period Selected: January 10, 2018 to January 10, 2023

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

Name: Harley Hobson

Phone: (512) 239-1337

Site and Owner/Operator History:

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

YES

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

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

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

- 1 Effective Date: 05/04/2018 ADMINORDER 2016-1709-IWD-E (1660 Order-Agreed Order With Denial)
Classification: Major
Citation: 2D TWC Chapter 26, SubChapter A 26.121(a)(1)
30 TAC Chapter 305, SubChapter F 305.125(1)
Rqmt Prov: Effluent Limits PERMIT
Description: Failed to comply with permitted effluent limitations, in violation of TEX. WATER CODE § 26.121(a)(1), 30 TEX. ADMIN. CODE § 305.125(1), and Texas Pollutant Discharge Elimination System ("TPDES") Permit No. WQ0000511000, Effluent Limitations and Monitoring Requirements No. 1, Outfall Nos. 001, 003 and 301 and Effluent Limitations and Monitoring Requirements No. 2, Outfall No. 009
- 2 Effective Date: 10/08/2018 ADMINORDER 2017-1219-AIR-E (1660 Order-Agreed Order With Denial)
Classification: Moderate
Citation: 30 TAC Chapter 116, SubChapter B 116.115(b)(2)(F)
30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)
5C THSC Chapter 382 382.085(b)
Rqmt Prov: General Terms and Conditions OP
Special Condition 1 PERMIT
Special Condition 14 OP
Description: Failure to prevent unauthorized emissions to the atmosphere during an emissions event that occurred on September 23, 2016, TCEQ/STEERS Incident No. 244445.
Classification: Moderate
Citation: 30 TAC Chapter 116, SubChapter B 116.115(b)(2)(F)
30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)
5C THSC Chapter 382 382.085(b)
Rqmt Prov: General Terms and Conditions OP
Special Condition 1 PERMIT
Special Condition 19 OP
Description: Failure to prevent unauthorized emissions to the atmosphere during an emissions event that occurred on October 20, 2016, TCEQ/STEERS Incident No. 245872.
Classification: Moderate
Citation: 30 TAC Chapter 116, SubChapter B 116.115(b)(2)(F)
30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)
5C THSC Chapter 382 382.085(b)
Rqmt Prov: General Terms and Conditions OP
Special Condition 1 PERMIT
Special Condition 17 OP
Description: Failure to prevent unauthorized emissions to the atmosphere during an emissions event that occurred on March 17, 2017, TCEQ Incident 254371.
- 3 Effective Date: 10/27/2020 ADMINORDER 2016-1906-AIR-E (1660 Order-Agreed Order With Denial)
Classification: Moderate
Citation: 30 TAC Chapter 116, SubChapter B 116.115(b)(2)(F)
30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)
Rqmt Prov: General Terms and Conditions OP
Special Condition 1 PERMIT
Special Condition 14 OP
Special Condition 17 OP
Special Condition 19 OP
Description: Failed to prevent unauthorized emissions. Specifically, the Respondent released 175.47 pounds ("lbs") of volatile organic compounds ("VOC") from the F6 Reabsorber Vent during an emissions event (Incident No. 222751) that began on November 7, 2015 and lasted 24 hours.
Classification: Moderate

Citation: 30 TAC Chapter 101, SubChapter F 101.201(b)(1)(H)
30 TAC Chapter 122, SubChapter B 122.143(4)

Rqmt Prov: General Terms and Conditions OP
Special Condition 2F OP

Description: Failure to provide the estimated total quantities of all compounds or mixtures of air contaminants released during an emissions event in the final records (TCEQ/STEERS Incident No. 222751).

Classification: Moderate

Citation: 30 TAC Chapter 116, SubChapter B 116.115(b)(2)(F)
30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)

Rqmt Prov: General Terms and Conditions OP
Special Condition 1 PERMIT
Special Condition 14 OP

Description: Failed to prevent unauthorized emissions. Specifically, the Respondent released 366 lbs of VOC from the F6 Reabsorber Vent during an emissions event (Incident No. 227974) that began on February 18, 2016 and lasted for 16 minutes.

Classification: Moderate

Citation: 30 TAC Chapter 116, SubChapter B 116.115(b)(2)(F)
30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)

Rqmt Prov: General Terms and Conditions OP
Special Condition 1 PERMIT
Special Condition 14 OP

Description: Failed to prevent unauthorized emissions. Specifically, the Respondent released 12,150.14 lbs of VOC from the F6 Reabsorber Vent during an emissions event (Incident No. 230209) that began on March 28, 2016 and lasted for 18 hours.

Classification: Moderate

Citation: 30 TAC Chapter 116, SubChapter B 116.115(b)(2)(F)
30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)

Rqmt Prov: General Terms and Conditions OP
Special Condition 1 PERMIT
Special Condition 17 OP
Special Condition 19 OP

Description: Failed to prevent unauthorized emissions. Specifically, the Respondent released 2,966 lbs of VOC, 2,149 lbs of CO, and 297 lbs of NOx from the PO Ground Flare, EPN POFLARE, 1,357 lbs of VOC, 2,936 lbs of CO, and 368 lbs of NOx from Flare No. 3, EPN UER037, and 607 lbs of CO, and 39 lbs of NOx collectively from Flare No. 1, EPN UER044, and Flare No. 2, EPN UER046, during an emissions event (Incident No. 239362) that began on July 19, 2016 and lasted for 48 hours.

Classification: Moderate

Citation: 30 TAC Chapter 116, SubChapter B 116.115(b)(2)(F)
30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)

Rqmt Prov: General Terms and Conditions OP
Special Condition 1 PERMIT
Special Condition 19 OP

Description: Failed to prevent unauthorized emissions. Specifically, the Respondent released 148.98 lbs of NOx and 301.63 lbs of CO from Flare Nos. 1 and 2, EPNs UER046 and UER044, respectively, and 1,580.26 lbs of VOC, 405.83 lbs of NOx, and 3,237 lbs of CO from Flare No. 3, EPN UER037, during an emissions event (Incident No. 242417) that began on August 28, 2016 and lasted for 14 hours and 39 minutes.

Classification: Moderate

Citation: 30 TAC Chapter 116, SubChapter B 116.115(b)(2)(F)
30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)

Rqmt Prov: General Terms and Conditions OP
Special Condition 1 PERMIT
Special Condition 13 PERMIT
Special Condition 19 OP

Description: Failed to prevent unauthorized emissions. Specifically, the Respondent released 5,416 lbs of VOC from the F-A3-103 DeMethanizer Pressure Relief Valve ("PRV") during an emissions event (Incident No. 242427) that began on August 28, 2016 and lasted eight minutes.

Classification: Moderate

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

30 TAC Chapter 122, SubChapter B 122.143(4)

Rqmt Prov: General Terms and Conditions OP

Special Condition 1 PERMIT

Special Condition 14 OP

Description: Failed to prevent unauthorized emissions. Specifically, the Respondent released 22,191 lbs of VOC from the F8 Ethylene Oxide Unit during emissions events (Incident Nos. 233310, 233312, and 233329) that occurred on May 15, 2016 and lasted one hour and 47 minutes and occurred on May 16, 2016 and lasted one hour and 27 minutes.

Classification: Moderate

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

Rqmt Prov: General Terms and Conditions OP

Special Condition 19 OP

Special Condition 28B PERMIT

Description: Failure to maintain the average annual flow rate for the North and Center Flares below permitted limits.

4 Effective Date: 11/28/2022 ADMINORDER 2020-1274-AIR-E (1660 Order-Agreed Order With Denial)

Classification: Moderate

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

30 TAC Chapter 122, SubChapter B 122.143(4)

5C THSC Chapter 382 382.085(b)

Rqmt Prov: NSR 20160 Special Condition 1 PERMIT

O3056 General Terms and Conditions OP

O3056 Special Condition 17 OP

Description: Failure to prevent unauthorized emissions. The Respondent released 13,459 pounds ("lbs") of volatile organic compounds ("VOC") and 41 lbs of acetone as fugitive emissions, during an emissions event (Incident No. 335200) that occurred on May 7, 2020 and lasted 15 minutes. The emissions event occurred due to an open bleeder valve in the TBA flush system and excessive vibration from excessive and cyclic flow through the TBA flush line that caused the plug on the bleeder valve to come off.

Classification: Moderate

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

30 TAC Chapter 122, SubChapter B 122.143(4)

5C THSC Chapter 382 382.085(b)

Rqmt Prov: FOP O13056 Special Condition 17 OP

FOP O3056 General Terms and Conditions OP

NSR 20160 Special Condition 1 PERMIT

Description: Failure to prevent unauthorized emissions. The Respondent released 3,759.78 lbs of VOC, 380.36 lbs of NOx, 35 lbs of acetone, and 2,771.66 lbs of CO from the Propylene Oxide ("PO") Ground Flare, EPN POFLARE, during an emissions event (Incident No. 335589) that began on May 16, 2020 and lasted 26 hours and two minutes. The emissions event occurred due to fouling in the float chamber of Level Controller Transmitter LT-2752 to fail and Compressor C-005 to safely shut down, resulting in flaring.

Classification: Moderate

Citation: 30 TAC Chapter 101, SubChapter F 101.201(b)(1)(F)

30 TAC Chapter 122, SubChapter B 122.143(4)

5C THSC Chapter 382 382.085(b)

Rqmt Prov: FOP O3056 General Terms and Conditions OP

FOP O3056 Special Condition 2F OP

Description: Failure to identify all required information on the final record for a reportable emissions event. The Respondent reported a duration of 37 hours and two minutes on the final record for Incident No. 335589, but after further review and investigation, the Respondent determined that the full duration of the emissions event was 26 hours and 2 mins.

Classification: Moderate

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

30 TAC Chapter 122, SubChapter B 122.143(4)

5C THSC Chapter 382 382.085(b)

Rqmt Prov: FOP O1320 General Terms and Conditions OP

FOP O1320 Special Condition 15 OP

FOP O3056 General Terms and Conditions OP

FOP O3056 Special Condition 17 OP

NSR 106169 Special Condition 1 PERMIT

NSR 20160 Special Condition 1 PERMIT

NSR 5952A Special Condition 1 PERMIT

NSR 5972A Special Condition 1 PERMIT

Description: Failure to prevent unauthorized emissions. The Respondent released 289.72 lbs of VOC, 70.66 lbs of NOx, 516.89 lbs of CO, and 17.72 lbs of acetone from the PO Ground Flare, EPN POFLARE, and 17,253.34 lbs of VOC as fugitive emissions from the F4 Unit (3,702.85 lbs), the F6 Unit (7,109.53 lbs), and the F8 Unit (6,440.96 lbs), during an emissions

event (Incident No. 343692) that began on October 9, 2020 and lasted eight hours. The emissions event occurred due to an area-wide power interruption

See addendum for information regarding federal actions.

B. Criminal convictions:

N/A

C. Chronic excessive emissions events:

N/A

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

Item 1	February 12, 2018	(1465800)	Item 32	March 25, 2020	(1647163)
Item 2	May 01, 2018	(1482263)	Item 33	April 03, 2020	(1632892)
Item 3	June 14, 2018	(1474203)	Item 34	April 10, 2020	(1632873)
Item 4	June 25, 2018	(1498328)	Item 35	May 08, 2020	(1646490)
Item 5	July 02, 2018	(1499106)	Item 36	June 22, 2020	(1666590)
Item 6	August 06, 2018	(1497881)	Item 38	August 14, 2020	(1664481)
Item 7	August 14, 2018	(1500326)	Item 39	August 18, 2020	(1666259)
Item 8	August 20, 2018	(1474362)	Item 40	October 14, 2020	(1666267)
Item 9	August 21, 2018	(1507534)	Item 41	October 27, 2020	(1684137)
Item 10	September 24, 2018	(1527233)	Item 42	January 15, 2021	(1690222)
Item 11	November 05, 2018	(1525865)	Item 43	May 30, 2021	(1705313)
Item 12	November 15, 2018	(1526096)	Item 44	June 03, 2021	(1705331)
Item 13	November 19, 2018	(1541426)	Item 45	June 04, 2021	(1706401)
Item 14	December 18, 2018	(1545210)	Item 46	June 08, 2021	(1706652)
Item 15	December 27, 2018	(1537332)	Item 47	June 09, 2021	(1706708)
Item 16	January 22, 2019	(1539063)	Item 48	June 25, 2021	(1735131)
Item 17	February 22, 2019	(1540687)	Item 49	November 08, 2021	(1765078)
Item 18	February 26, 2019	(1550024)	Item 50	November 16, 2021	(1762383)
Item 19	March 19, 2019	(1559604)	Item 51	November 22, 2021	(1783603)
Item 20	April 08, 2019	(1554750)	Item 52	December 07, 2021	(1764498)
Item 21	April 25, 2019	(1571807)	Item 53	December 24, 2021	(1790627)
Item 22	May 08, 2019	(1555583)	Item 54	January 20, 2022	(1798422)
Item 23	May 15, 2019	(1552240)	Item 55	February 17, 2022	(1782346)
Item 24	June 25, 2019	(1576172)	Item 56	March 14, 2022	(1782372)
Item 25	June 26, 2019	(1583224)	Item 58	May 20, 2022	(1817383)
Item 26	October 22, 2019	(1603077)	Item 59	October 20, 2022	(1804094)
Item 27	November 13, 2019	(1605757)	Item 60	November 04, 2022	(1853646)
Item 28	November 18, 2019	(1605647)	Item 62	November 18, 2022	(1859919)
Item 29	November 20, 2019	(1619031)	Item 63	December 16, 2022	(1866706)
Item 30	January 24, 2020	(1634024)	Item 64	December 20, 2022	(1866347)
Item 31	February 25, 2020	(1640643)	Item 65	January 02, 2023	(1867211)

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: 01/31/2022 (1806297)
 Self Report? YES Classification: Moderate
 Citation: 2D TWC Chapter 26, SubChapter A 26.121(a)
 30 TAC Chapter 305, SubChapter F 305.125(1)
 Description: Failure to meet the limit for one or more permit parameter

- 2 Date: 02/28/2022 (1813362)
 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

- 3 Date: 02/28/2022 (1774849)
 Self Report? NO Classification: Moderate
 Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
 30 TAC Chapter 122, SubChapter B 122.143(4)
 5C THSC Chapter 382 382.085(b)
 FOP O2286 General Terms and Conditions OP

Description: Failure to comply with permit conditions regarding the use of compounds. EIC
B18(g)(1) Mod 2D

- 4 Date: 03/31/2022 (1819934)
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: 04/01/2022 (1796299)
Self Report? NO Classification: Minor
Citation: DSPC, Pg. 3, No. 2(a) PERMIT
Description: Failure by Indorama Ventures Propylene Oxides, LLC - Port Neches Operation
(Indorama) to calibrate the flow meter at least annually to ensure accuracy.
Self Report? NO Classification: Minor
Citation: OpR, Pg. 11, No. 1 PERMIT
Description: Failure by Indorama Ventures Propylene Oxides, LLC - Port Neches Operation
(Indorama) to properly operate and maintain all systems of collection, treatment,
and disposal.
Self Report? NO Classification: Minor
Citation: OpR, Pg. 11, No. 1 PERMIT
Description: Failure by Indorama Ventures Propylene Oxides, LLC - Port Neches Operation
(Indorama) to properly operate and maintain all systems of collection, treatment,
and disposal.
Self Report? NO Classification: Minor
Citation: OpR, Pg. 11, No. 1 PERMIT
Description: Failure by Indorama Ventures Propylene Oxides, LLC - Port Neches Operation
(Indorama) to properly operate and maintain all systems of collection, treatment,
and disposal.
Self Report? NO Classification: Minor
Citation: MRR 7(c) PERMIT
Description: Failure by Indorama Ventures Oxides to report any effluent violation that deviates
from the permitted effluent limitation by more than 40% in writing to the
Regional Office and the Enforcement Division (MC 224) within 5 working days of
becoming aware of the noncompliance.
Self Report? NO Classification: Minor
Citation: MRR 3(c)(i) PERMIT
Description: Failure by Indorama Ventures Oxides (Indorama) to maintain records of
monitoring activities.
Self Report? NO Classification: Minor
Citation: MRR 3(c)(iii) PERMIT
Description: Failure by Indorama Ventures Oxides (Indorama) to maintain records of
monitoring activities.
Self Report? NO Classification: Minor
Citation: MRR 2(a) PERMIT
Description: Failure by Indorama Ventures Oxides to comply with test procedures specified in
30 TAC 319.11 - 319.12.
Self Report? NO Classification: Minor
Citation: MRR 2(a) PERMIT
Description: Failure by Indorama Ventures Oxides to comply with test procedures specified in
30 TAC 319.11 - 319.12.
Self Report? NO Classification: Minor
Citation: MRR 3(c)(vi) PERMIT
Description: Failure by Indorama Ventures Oxides to maintain records of monitoring activities.
Self Report? NO Classification: Minor
Citation: MRR 3(a) PERMIT
Description: Failure by Indorama Ventures Oxides to obtain measurements at times and in a
manner so as to be representative of the monitored activity.
Self Report? NO Classification: Minor
Citation: MRR 3(c)(vi) PERMIT
Description: Failure by Indorama Ventures Oxides to maintain records of monitoring activities.
Self Report? NO Classification: Minor
Citation: MRR 2(a) PERMIT
Description: Failure by Indorama Ventures Oxides to comply with test procedures 30 TAC
319.11 - 319.12.
Self Report? NO Classification: Moderate
Citation: ELMR 3 PERMIT
PC 2(d) PERMIT

Description: Failure by Indorama Ventures Oxides to take all reasonable steps to prevent a discharge that had a reasonable likelihood of adversely affecting human health or the environment which resulted in the discharge of visible oil.
 Self Report? NO Classification: Minor
 Citation: OpR 11(f) PERMIT

Description: Failure by Indorama Ventures Oxides to make records readily available for review by authorized representatives of the TCEQ.
 Self Report? NO Classification: Minor
 Citation: OpR 1 PERMIT

Description: Failure by Indorama Ventures Oxides to properly operate and maintain units of collection, treatment, and disposal.
 Self Report? NO Classification: Minor
 Citation: MRR 3(c)(i) PERMIT

Description: Failure by Indorama Ventures Oxides to maintain records of monitoring activities.
 Self Report? NO Classification: Moderate
 Citation: ELMR 1 PERMIT

Description: Failure by Indorama Ventures Oxides to discharge compliant effluent for oil and grease through Outfall 008.
 Self Report? NO Classification: Moderate
 Citation: ELMR 1 PERMIT

Description: Failure by Indorama Ventures Oxides to discharge compliant effluent for chemical oxygen demand at Outfall 301.
 Self Report? NO Classification: Moderate
 Citation: OT 2 PERMIT

Description: Failure by Indorama Ventures Oxides to report orally or by facsimile within 24 hours of becoming aware of the violation and a written report within five working days to the TCEQ Region 10 and the Enforcement Division (MC 224) when exceeding the daily maximum limitation of zinc.
 Self Report? NO Classification: Minor
 Citation: MRR 3(c)(v) PERMIT

Description: Failure Indorama Ventures Oxides to maintain records of monitoring activities.

6 Date: 04/30/2022 (1828774)
 Self Report? YES Classification: Moderate
 Citation: 2D TWC Chapter 26, SubChapter A 26.121(a)
 30 TAC Chapter 305, SubChapter F 305.125(1)
 Description: Failure to meet the limit for one or more permit parameter

7 Date: 05/31/2022 (1835064)
 Self Report? YES Classification: Moderate
 Citation: 2D TWC Chapter 26, SubChapter A 26.121(a)
 30 TAC Chapter 305, SubChapter F 305.125(1)
 Description: Failure to meet the limit for one or more permit parameter

8 Date: 06/30/2022 (1842270)
 Self Report? YES Classification: Moderate
 Citation: 2D TWC Chapter 26, SubChapter A 26.121(a)
 30 TAC Chapter 305, SubChapter F 305.125(1)
 Description: Failure to meet the limit for one or more permit parameter

9 Date: 07/31/2022 (1848404)
 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

10 Date: 08/10/2022 (1832699)
 Self Report? NO Classification: Moderate
 Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
 30 TAC Chapter 122, SubChapter B 122.143(4)
 5C THSC Chapter 382 382.085(b)
 FOP O2288 GTC OP
 FOP O2288 SC 19 OP
 NSR 19823 SC 25F PERMIT
 Description: Failure to maintain wastewater carbon bed Volatile Organic Compounds (VOC) concentrations below permitted limits. EIC B18(g)(1) Mod 2D
 Self Report? NO Classification: Moderate
 Citation: 30 TAC Chapter 101, SubChapter A 101.20(3)
 30 TAC Chapter 116, SubChapter B 116.115(c)

30 TAC Chapter 122, SubChapter B 122.143(4)
 5C THSC Chapter 382 382.085(b)
 FOP O2288 GTC OP
 FOP O2288 SC 19 OP
 NSR 16909 & PSDTX780 SC 1 PERMIT
 NSR 16909 & PSDTX780 SC 4 PERMIT
 Description: Failure to comply with permitted emissions rates for the Cogen Unit 1, EPN CG1.
 EIC B18(g)(1) Mod 2D
 Self Report? NO Classification: Moderate
 Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
 30 TAC Chapter 122, SubChapter B 122.143(4)
 5C THSC Chapter 382 382.085(b)
 FOP O2288 GTC OP
 FOP O2288 SC 19 OP
 NSR 19823 SC 19B PERMIT
 Description: Failure to maintain Cooling Tower EPN CT-4 Total Dissolved Solids (TDS) below
 permitted limits. EIC B18(g)(1) Mod 2D
 Self Report? NO Classification: Moderate
 Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
 30 TAC Chapter 122, SubChapter B 122.143(4)
 5C THSC Chapter 382 382.085(b)
 FOP O2288 GTC OP
 FOP O2288 SC 19 OP
 NSR 19823 SC 10F PERMIT
 Description: Failure to maintain flare heat inputs below the maximum combined limit for the
 North/Center Flares, EPNs UER044 and UER046, as required. EIC B18(g)(1)
 Mod 2D
 Self Report? NO Classification: Moderate
 Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
 30 TAC Chapter 122, SubChapter B 122.143(4)
 5C THSC Chapter 382 382.085(b)
 FOP O2288 GTC OP
 FOP O2288 SC 19 OP
 NSR 19823 SC 10F PERMIT
 Description: Failure to maintain flare heat inputs below the maximum limit for the South Flare,
 EPN UER037, as required. EIC B18(g)(1) Mod 2D
 Self Report? NO Classification: Moderate
 Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
 30 TAC Chapter 122, SubChapter B 122.143(4)
 5C THSC Chapter 382 382.085(b)
 FOP O2288 GTC OP
 FOP O2288 SC 19 OP
 NSR 19823 SC 1 PERMIT
 NSR 19823 SC 13A PERMIT
 NSR 19823 SC 8 PERMIT
 Description: Failure to comply with permitted emissions rates for the Waste Heat Boiler, EPN
 A3HA35. EIC B18(g)(1) Mod 2D
 Self Report? NO Classification: Moderate
 Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
 30 TAC Chapter 122, SubChapter B 122.143(4)
 5C THSC Chapter 382 382.085(b)
 FOP O2288 GTC OP
 FOP O2288 SC 19 OP
 NSR 49247 SC 3 PERMIT
 Description: Failure to maintain the minimum concentration in the aeration basins as required.
 EIC B18(g)(1) Mod 2D
 Self Report? NO Classification: Moderate
 Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
 30 TAC Chapter 122, SubChapter B 122.143(4)
 40 CFR Chapter 60, SubChapter C, PT 60, SubPT A 60.18(c)(3)(ii)
 5C THSC Chapter 382 382.085(b)
 FOP O2288 GTC OP
 FOP O2288 SC 19 OP
 FOP O2288 SC 1A OP
 NSR 19823 SC 10A PERMIT
 Description: Failure to maintain the minimum heating value for the South Flare, EPN UER037.
 EIC B18(g)(1) Mod 2D
 Self Report? NO Classification: Moderate
 Citation: 30 TAC Chapter 122, SubChapter B 122.143(4)
 30 TAC Chapter 122, SubChapter B 122.145(2)(A)
 5C THSC Chapter 382 382.085(b)
 FOP O2288 GTC OP
 Description: Failure to report deviations on a deviation report. EIC B3 MOD 2G

11 Date: 08/15/2022 (1833534)
Self Report? NO Classification: Moderate
Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)
5C THSC Chapter 382 382.085(b)
FOP O1320 SC 16 OP
NSR 5952A SC 14B PERMIT
O1320 GTC OP
Description: Failure to maintain the F6 Incinerator within the permitted temperature limit as required. EIC B18(g)(1) Mod 2D
Self Report? NO Classification: Moderate
Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)
5C THSC Chapter 382 382.085(b)
FOP O1320 GTC PERMIT
FOP O1320 SC 16 OP
NSR 5972A SC 4 PERMIT
Description: Failure to maintain the F4 Incinerator within the permitted temperature limit as required. EIC B18(g)(1) Mod 2D
Self Report? NO Classification: Moderate
Citation: 30 TAC Chapter 122, SubChapter B 122.143(4)
30 TAC Chapter 122, SubChapter B 122.145(2)(A)
5C THSC Chapter 382 382.085(b)
O1320 GTC OP
Description: Failure to report deviations on a deviation report. EIC B3 MOD 2G

12 Date: 08/30/2022 (1833615)
Self Report? NO Classification: Moderate
Citation: 30 TAC Chapter 116, SubChapter B 116.115(b)(2)(F)
30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)
5C THSC Chapter 382 382.085(b)
NSR 20160 SC 1 PERMIT
NSR 20160 SC 10A PERMIT
NSR 20160 SC 10D PERMIT
O3056 GTC OP
O3056 SC 17 OP
Description: Failure to comply with permitted emissions rates for Boilers H-K2-001 and H-K2-002, EPN STEAMGEN. EIC B18(g)(1) Mod 2D
Self Report? NO Classification: Moderate
Citation: 30 TAC Chapter 116, SubChapter B 116.115(b)(2)(F)
30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)
5C THSC Chapter 382 382.085(b)
FOP O3056 GTC OP
FOP O3056 SC 17 OP
NSR 20160 SC 1 PERMIT
NSR 20160 SC 12E PERMIT
SC 12B PERMIT
Description: Failure to comply with permitted emissions rates for Boiler H-K2-003, EPN HK-F5-003. EIC B18(g)(1) Mod 2D
Self Report? NO Classification: Moderate
Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)
5C THSC Chapter 382 382.085(b)
FOP O3056 GTC OP
FOP O3056 SC 17 OP
NSR 20160 SC 14A PERMIT
NSR 20160 SC 14I PERMIT
Description: Failure to comply with permitted emissions rates for Boiler H-K2-004, EPN HK-F5-004. EIC B18(g)(1) Mod 2D
Self Report? NO Classification: Moderate
Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)
40 CFR Chapter 60, SubChapter C, PT 60, SubPT Kb 60.113b(a)(2)
5C THSC Chapter 382 382.085(b)
FOP O3056 GTC OP
FOP O3056 SC 17 OP
FOP O3056 SC 1A OP
NSR 20160 SC 30B PERMIT
Description: Failure to conduct an annual inspection on a floating roof tank as required. EIC B18(g)(1) Mod 2D
Self Report? NO Classification: Moderate

Citation: 30 TAC Chapter 106, SubChapter A 106.4(a)(6)
 30 TAC Chapter 116, SubChapter B 116.115(b)
 30 TAC Chapter 122, SubChapter B 122.143(4)
 5C THSC Chapter 382 382.085(b)
 FOP O3056 GTC OP
 FOP O3056 SC 18 OP
 PBR 161628 GTC PERMIT

Description: Failure to submit notification of tank construction on time as required. EIC B3
 Mod 2B

Self Report? NO Classification: Moderate

Citation: 30 TAC Chapter 122, SubChapter B 122.143(4)
 30 TAC Chapter 122, SubChapter B 122.145(2)(A)
 5C THSC Chapter 382 382.085(b)
 FOP O3056 GTC OP

Description: Failure to report deviations on a deviation report as required. EIC B3 MOD
 2G

Self Report? NO Classification: Moderate

Citation: 30 TAC Chapter 101, SubChapter F 101.201(b)(2)
 30 TAC Chapter 116, SubChapter B 116.115(c)
 30 TAC Chapter 122, SubChapter B 122.143(4)
 5C THSC Chapter 382 382.085(b)
 FOP O3056 GTC OP
 FOP O3056 SC 17 OP
 FOP O3056 SC 2F OP
 NSR 20160 GTC 9 PERMIT

Description: Failure to create an accurate final record of non-reportable emissions events. EIC
 B3 Mod 2B

13 Date: 08/31/2022 (1856200)
 Self Report? YES Classification: Moderate

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

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

14 Date: 09/30/2022 (1862558)
 Self Report? YES Classification: Moderate

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

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

F. Environmental audits:

Notice of Intent Date: 09/27/2019 (1602679)

Disclosure Date: 12/18/2019

Viol. Classification: Moderate

Citation: 30 TAC Chapter 101, SubChapter A 101.20(2)
 40 CFR Chapter 63, SubChapter C, PT 63, SubPT A 63.10(b)
 40 CFR Chapter 63, SubChapter C, PT 63, SubPT G 63.151(j)

Description: Failed to report and maintain documentation for updated Hazardous Organic NESHAP (HON) applicability for F4, F6, and F5 operating units.

Viol. Classification: Moderate

Citation: 30 TAC Chapter 101, SubChapter A 101.20(2)
 40 CFR Chapter 63, SubChapter C, PT 63, SubPT F 63.100
 40 CFR Chapter 63, SubChapter C, PT 63, SubPT G 63.151(j)

Description: Failed to update the Notification of Compliance Status to reflect revised applicability for F4, F6, and F5 operating units.

Viol. Classification: Moderate

Citation: 30 TAC Chapter 101, SubChapter A 101.20(2)
 40 CFR Chapter 63, SubChapter C, PT 63, SubPT A 63.10(b)
 40 CFR Chapter 63, SubChapter C, PT 63, SubPT G 63.151(j)

Description: Failed to report and maintain detailed applicability documentation for group status determinations of the F8 operating unit.

Viol. Classification: Moderate

Citation: 30 TAC Chapter 101, SubChapter A 101.20(2)
 40 CFR Chapter 63, SubChapter C, PT 63, SubPT G 63.152(b)

Description: Failed to update and submit Notice of Compliance Status documentation for the F8 operating unit.

Viol. Classification: Moderate

Citation: 30 TAC Chapter 101, SubChapter A 101.20(2)
 40 CFR Chapter 63, SubChapter C, PT 63, SubPT G 63.115

40 CFR Chapter 63, SubChapter C, PT 63, SubPT G 63.115(a)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT G 63.115(b)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT G 63.115(c)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT G 63.115(d)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT G 63.115(e)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT G 63.115(f)

Description: Failed to maintain consistent documentation for the CO2 Vents associated with F4, F6, and F8 operating units and which adequately demonstrates Group 2 status as required.

Viol. Classification: Moderate

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

Rqmt Prov: PERMIT General Condition 1
PERMIT General Requirements 1

Description: Failed to provide accurate permit representations. Specifically, permitted maximum emissions rates for CO2 vents and wastewater fugitives are higher than actual emissions and do not align with existing Hazardous Organic NESHAP applicability determinations.

Viol. Classification: Moderate

Citation: 30 TAC Chapter 101, SubChapter A 101.20(2)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT G 63.132(a)(1)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT G 63.132(c)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT G 63.144(b)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT G 63.144(c)

Description: Failed to maintain detailed applicability documentation for several Hazardous Organic NESHAP wastewater Points of Determination.

Viol. Classification: Moderate

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

40 CFR Part 63, Subpart G 63.132(a)(2)(i)

Description: Failed to identify all Hazardous Organic NESHAP waste management units managing HON Group 1 Wastewater Streams.

Viol. Classification: Moderate

Citation: 30 TAC Chapter 101, SubChapter A 101.20(2)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT G 63.143(a)

Description: Failed to update documentation for Table 11 semiannual inspections for HON waste management units.

Viol. Classification: Moderate

Citation: 30 TAC Chapter 101, SubChapter A 101.20(2)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT G 63.148(i)

Description: Failed to update documentation for annual visual inspections for HON closed vent systems.

Viol. Classification: Moderate

Citation: 30 TAC Chapter 101, SubChapter A 101.20(2)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT G 63.110(d)

Description: Failed to prevent an incorrect application of overlap for process vents between 40 CFR Part 60, NSPS NNN/RRR and 40 CFR Part 63, Subparts F and G.

G. Type of environmental management systems (EMSs):

N/A

H. Voluntary on-site compliance assessment dates:

N/A

I. Participation in a voluntary pollution reduction program:

N/A

J. Early compliance:

N/A

Sites Outside of Texas:

N/A



Compliance History Report

Compliance History Report for CN605743038, RN100219252, Rating Year 2022 which includes Compliance History (CH) components from September 1, 2017, through August 31, 2022.

Customer, Respondent, or Owner/Operator: CN605743038, Indorama Ventures Oxides LLC **Classification:** SATISFACTORY **Rating:** 8.42

Regulated Entity: RN100219252, PORT NECHES OPERATIONS **Classification:** SATISFACTORY **Rating:** 10.94

Complexity Points: 47 **Repeat Violator:** NO

CH Group: 05 - Chemical Manufacturing

Location: 2701 Spur 136 in Port Neches, Jefferson County, Texas

TCEQ Region: REGION 10 - BEAUMONT

ID Number(s):

AIR OPERATING PERMITS ACCOUNT NUMBER JE0052V

AIR OPERATING PERMITS PERMIT 2286

AIR OPERATING PERMITS PERMIT 2288

AIR NEW SOURCE PERMITS AFS NUM 4824500006

AIR NEW SOURCE PERMITS REGISTRATION 51736

AIR NEW SOURCE PERMITS REGISTRATION 54551

AIR NEW SOURCE PERMITS REGISTRATION 44034

AIR NEW SOURCE PERMITS REGISTRATION 45090

AIR NEW SOURCE PERMITS REGISTRATION 45277

AIR NEW SOURCE PERMITS REGISTRATION 47065

AIR NEW SOURCE PERMITS REGISTRATION 47555

AIR NEW SOURCE PERMITS REGISTRATION 47887

AIR NEW SOURCE PERMITS REGISTRATION 48176

AIR NEW SOURCE PERMITS REGISTRATION 49493

AIR NEW SOURCE PERMITS PERMIT 647B

AIR NEW SOURCE PERMITS PERMIT 5952A

AIR NEW SOURCE PERMITS REGISTRATION 7761

AIR NEW SOURCE PERMITS PERMIT 19823

AIR NEW SOURCE PERMITS PERMIT 20160

AIR NEW SOURCE PERMITS REGISTRATION 31443

AIR NEW SOURCE PERMITS REGISTRATION 36453

AIR NEW SOURCE PERMITS REGISTRATION 40103

AIR NEW SOURCE PERMITS REGISTRATION 41444

AIR NEW SOURCE PERMITS REGISTRATION 41757

AIR NEW SOURCE PERMITS REGISTRATION 42153

AIR NEW SOURCE PERMITS REGISTRATION 75597

AIR NEW SOURCE PERMITS REGISTRATION 75748

AIR NEW SOURCE PERMITS REGISTRATION 55753

AIR NEW SOURCE PERMITS PERMIT 56390

AIR NEW SOURCE PERMITS REGISTRATION 70571

AIR NEW SOURCE PERMITS REGISTRATION 70726

AIR NEW SOURCE PERMITS REGISTRATION 56073

AIR NEW SOURCE PERMITS REGISTRATION 54219

AIR NEW SOURCE PERMITS REGISTRATION 72310

AIR NEW SOURCE PERMITS REGISTRATION 54570

AIR NEW SOURCE PERMITS REGISTRATION 71751

AIR NEW SOURCE PERMITS REGISTRATION 50360

AIR NEW SOURCE PERMITS REGISTRATION 72907

AIR NEW SOURCE PERMITS REGISTRATION 75203

AIR NEW SOURCE PERMITS REGISTRATION 76732

AIR NEW SOURCE PERMITS REGISTRATION 78974

AIR OPERATING PERMITS PERMIT 1320

AIR OPERATING PERMITS PERMIT 2287

AIR OPERATING PERMITS PERMIT 3056

AIR NEW SOURCE PERMITS PERMIT 29516

AIR NEW SOURCE PERMITS REGISTRATION 52715

AIR NEW SOURCE PERMITS REGISTRATION 54565

AIR NEW SOURCE PERMITS REGISTRATION 44434

AIR NEW SOURCE PERMITS REGISTRATION 45094

AIR NEW SOURCE PERMITS REGISTRATION 46791

AIR NEW SOURCE PERMITS REGISTRATION 47066

AIR NEW SOURCE PERMITS REGISTRATION 47577

AIR NEW SOURCE PERMITS REGISTRATION 48178

AIR NEW SOURCE PERMITS PERMIT 49247

AIR NEW SOURCE PERMITS ACCOUNT NUMBER JE0052V

AIR NEW SOURCE PERMITS PERMIT 5807A

AIR NEW SOURCE PERMITS PERMIT 5972A

AIR NEW SOURCE PERMITS PERMIT 16909

AIR NEW SOURCE PERMITS PERMIT 20134

AIR NEW SOURCE PERMITS REGISTRATION 23568

AIR NEW SOURCE PERMITS PERMIT 36646

AIR NEW SOURCE PERMITS REGISTRATION 39725

AIR NEW SOURCE PERMITS REGISTRATION 40527

AIR NEW SOURCE PERMITS REGISTRATION 41301

AIR NEW SOURCE PERMITS REGISTRATION 42103

AIR NEW SOURCE PERMITS REGISTRATION 42154

AIR NEW SOURCE PERMITS REGISTRATION 76018

AIR NEW SOURCE PERMITS PERMIT 83816

AIR NEW SOURCE PERMITS REGISTRATION 70024

AIR NEW SOURCE PERMITS REGISTRATION 56243

AIR NEW SOURCE PERMITS REGISTRATION 70781

AIR NEW SOURCE PERMITS REGISTRATION 53551

AIR NEW SOURCE PERMITS REGISTRATION 70011

AIR NEW SOURCE PERMITS REGISTRATION 53979

AIR NEW SOURCE PERMITS REGISTRATION 54231

AIR NEW SOURCE PERMITS REGISTRATION 54234

AIR NEW SOURCE PERMITS REGISTRATION 52077

AIR NEW SOURCE PERMITS REGISTRATION 73663

AIR NEW SOURCE PERMITS REGISTRATION 74296

AIR NEW SOURCE PERMITS REGISTRATION 75202

AIR NEW SOURCE PERMITS REGISTRATION 77129

AIR NEW SOURCE PERMITS REGISTRATION 79529

AIR NEW SOURCE PERMITS REGISTRATION 80149
AIR NEW SOURCE PERMITS REGISTRATION 81531
AIR NEW SOURCE PERMITS REGISTRATION 82922
AIR NEW SOURCE PERMITS EPA PERMIT PSDTX780
AIR NEW SOURCE PERMITS REGISTRATION 139463
AIR NEW SOURCE PERMITS REGISTRATION 110757
AIR NEW SOURCE PERMITS REGISTRATION 110787
AIR NEW SOURCE PERMITS REGISTRATION 110808
AIR NEW SOURCE PERMITS REGISTRATION 150790
AIR NEW SOURCE PERMITS REGISTRATION 153791
AIR NEW SOURCE PERMITS REGISTRATION 152840
AIR NEW SOURCE PERMITS REGISTRATION 154036
AIR NEW SOURCE PERMITS REGISTRATION 164694
AIR NEW SOURCE PERMITS REGISTRATION 168479
AIR NEW SOURCE PERMITS REGISTRATION 169413
AIR NEW SOURCE PERMITS REGISTRATION 164877
AIR NEW SOURCE PERMITS REGISTRATION 167574
AIR NEW SOURCE PERMITS REGISTRATION 170963
AIR NEW SOURCE PERMITS REGISTRATION 163874
AIR NEW SOURCE PERMITS REGISTRATION 142196
AIR NEW SOURCE PERMITS REGISTRATION 148227
AIR NEW SOURCE PERMITS REGISTRATION 150168
AIR NEW SOURCE PERMITS REGISTRATION 156133
AIR NEW SOURCE PERMITS REGISTRATION 155871
AIR NEW SOURCE PERMITS REGISTRATION 160459
AIR NEW SOURCE PERMITS REGISTRATION 155472
AIR NEW SOURCE PERMITS REGISTRATION 161628
AIR NEW SOURCE PERMITS REGISTRATION 152402
AIR NEW SOURCE PERMITS REGISTRATION 155384
AIR NEW SOURCE PERMITS REGISTRATION 155634
PETROLEUM STORAGE TANK REGISTRATION
REGISTRATION 40711
IHW CORRECTIVE ACTION SOLID WASTE REGISTRATION
(SWR) 30029
WASTEWATER EPA ID TX0005070
POLLUTION PREVENTION PLANNING ID NUMBER
P00679
INDUSTRIAL AND HAZARDOUS WASTE PERMIT 50363

INDUSTRIAL AND HAZARDOUS WASTE EPA ID
TXD008076846
TAX RELIEF ID NUMBER 17954
TAX RELIEF ID NUMBER 17984
TAX RELIEF ID NUMBER 17095
TAX RELIEF ID NUMBER 17093
TAX RELIEF ID NUMBER 17940
TAX RELIEF ID NUMBER 17977
TAX RELIEF ID NUMBER 18835
TAX RELIEF ID NUMBER 17985
TAX RELIEF ID NUMBER 24379

Compliance History Period: September 01, 2017 to August 31, 2022

Rating Year: 2022

Rating Date: 09/01/2022

Date Compliance History Report Prepared: January 10, 2023

Agency Decision Requiring Compliance History: Enforcement

Component Period Selected: January 10, 2018 to January 10, 2023

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

Name: Harley Hobson

Phone: (512) 239-1337

Site and Owner/Operator History:

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

YES

AIR NEW SOURCE PERMITS REGISTRATION 80702
AIR NEW SOURCE PERMITS REGISTRATION 81415
AIR NEW SOURCE PERMITS REGISTRATION 92256
AIR NEW SOURCE PERMITS REGISTRATION 91994
AIR NEW SOURCE PERMITS PERMIT 106169
AIR NEW SOURCE PERMITS REGISTRATION 109215
AIR NEW SOURCE PERMITS REGISTRATION 110809
AIR NEW SOURCE PERMITS REGISTRATION 110813
AIR NEW SOURCE PERMITS REGISTRATION 150484
AIR NEW SOURCE PERMITS REGISTRATION 150307
AIR NEW SOURCE PERMITS REGISTRATION 152982
AIR NEW SOURCE PERMITS REGISTRATION 163020
AIR NEW SOURCE PERMITS REGISTRATION 169507
AIR NEW SOURCE PERMITS REGISTRATION 164604
AIR NEW SOURCE PERMITS REGISTRATION 166541
AIR NEW SOURCE PERMITS REGISTRATION 167060
AIR NEW SOURCE PERMITS REGISTRATION 170571
AIR NEW SOURCE PERMITS REGISTRATION 169228
AIR NEW SOURCE PERMITS REGISTRATION 166117
AIR NEW SOURCE PERMITS REGISTRATION 151107
AIR NEW SOURCE PERMITS REGISTRATION 143027
AIR NEW SOURCE PERMITS REGISTRATION 150992
AIR NEW SOURCE PERMITS PERMIT 79802
AIR NEW SOURCE PERMITS REGISTRATION 160594
AIR NEW SOURCE PERMITS REGISTRATION 159322
AIR NEW SOURCE PERMITS REGISTRATION 161151
AIR NEW SOURCE PERMITS REGISTRATION 157572
AIR NEW SOURCE PERMITS REGISTRATION 160045
AIR NEW SOURCE PERMITS REGISTRATION 160606
AIR NEW SOURCE PERMITS REGISTRATION 171239
PETROLEUM STORAGE TANK REGISTRATION
REGISTRATION 79935
WASTEWATER PERMIT WQ0000511000
AIR EMISSIONS INVENTORY ACCOUNT NUMBER JE0052V
INDUSTRIAL AND HAZARDOUS WASTE PERMIT 50055
INDUSTRIAL AND HAZARDOUS WASTE EPA ID
TX0000201202
INDUSTRIAL AND HAZARDOUS WASTE SOLID WASTE
REGISTRATION # (SWR) 30029
TAX RELIEF ID NUMBER 17974
TAX RELIEF ID NUMBER 17986
TAX RELIEF ID NUMBER 17100
TAX RELIEF ID NUMBER 17975
TAX RELIEF ID NUMBER 17983
TAX RELIEF ID NUMBER 18840
TAX RELIEF ID NUMBER 17970
TAX RELIEF ID NUMBER 17088

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

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

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

- 1 Effective Date: 05/04/2018 ADMINORDER 2016-1709-IWD-E (1660 Order-Agreed Order With Denial)
Classification: Major
Citation: 2D TWC Chapter 26, SubChapter A 26.121(a)(1)
30 TAC Chapter 305, SubChapter F 305.125(1)
Rqmt Prov: Effluent Limits PERMIT
Description: Failed to comply with permitted effluent limitations, in violation of TEX. WATER CODE § 26.121(a)(1), 30 TEX. ADMIN. CODE § 305.125(1), and Texas Pollutant Discharge Elimination System ("TPDES") Permit No. WQ0000511000, Effluent Limitations and Monitoring Requirements No. 1, Outfall Nos. 001, 003 and 301 and Effluent Limitations and Monitoring Requirements No. 2, Outfall No. 009

- 2 Effective Date: 10/08/2018 ADMINORDER 2017-1219-AIR-E (1660 Order-Agreed Order With Denial)
Classification: Moderate
Citation: 30 TAC Chapter 116, SubChapter B 116.115(b)(2)(F)
30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)
5C THSC Chapter 382 382.085(b)
Rqmt Prov: General Terms and Conditions OP
Special Condition 1 PERMIT
Special Condition 14 OP
Description: Failure to prevent unauthorized emissions to the atmosphere during an emissions event that occurred on September 23, 2016, TCEQ/STEERS Incident No. 244445.
Classification: Moderate
Citation: 30 TAC Chapter 116, SubChapter B 116.115(b)(2)(F)
30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)
5C THSC Chapter 382 382.085(b)
Rqmt Prov: General Terms and Conditions OP
Special Condition 1 PERMIT
Special Condition 19 OP
Description: Failure to prevent unauthorized emissions to the atmosphere during an emissions event that occurred on October 20, 2016, TCEQ/STEERS Incident No. 245872.
Classification: Moderate
Citation: 30 TAC Chapter 116, SubChapter B 116.115(b)(2)(F)
30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)
5C THSC Chapter 382 382.085(b)
Rqmt Prov: General Terms and Conditions OP
Special Condition 1 PERMIT
Special Condition 17 OP
Description: Failure to prevent unauthorized emissions to the atmosphere during an emissions event that occurred on March 17, 2017, TCEQ Incident 254371.

- 3 Effective Date: 10/27/2020 ADMINORDER 2016-1906-AIR-E (1660 Order-Agreed Order With Denial)
Classification: Moderate
Citation: 30 TAC Chapter 116, SubChapter B 116.115(b)(2)(F)
30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)
Rqmt Prov: General Terms and Conditions OP
Special Condition 1 PERMIT
Special Condition 14 OP
Special Condition 17 OP
Special Condition 19 OP
Description: Failed to prevent unauthorized emissions. Specifically, the Respondent released 175.47 pounds ("lbs") of volatile organic compounds ("VOC") from the F6 Reabsorber Vent during an emissions event (Incident No. 222751) that began on November 7, 2015 and lasted 24 hours.
Classification: Moderate

Citation: 30 TAC Chapter 101, SubChapter F 101.201(b)(1)(H)
30 TAC Chapter 122, SubChapter B 122.143(4)

Rqmt Prov: General Terms and Conditions OP
Special Condition 2F OP

Description: Failure to provide the estimated total quantities of all compounds or mixtures of air contaminants released during an emissions event in the final records (TCEQ/STEERS Incident No. 222751).

Classification: Moderate

Citation: 30 TAC Chapter 116, SubChapter B 116.115(b)(2)(F)
30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)

Rqmt Prov: General Terms and Conditions OP
Special Condition 1 PERMIT
Special Condition 14 OP

Description: Failed to prevent unauthorized emissions. Specifically, the Respondent released 366 lbs of VOC from the F6 Reabsorber Vent during an emissions event (Incident No. 227974) that began on February 18, 2016 and lasted for 16 minutes.

Classification: Moderate

Citation: 30 TAC Chapter 116, SubChapter B 116.115(b)(2)(F)
30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)

Rqmt Prov: General Terms and Conditions OP
Special Condition 1 PERMIT
Special Condition 14 OP

Description: Failed to prevent unauthorized emissions. Specifically, the Respondent released 12,150.14 lbs of VOC from the F6 Reabsorber Vent during an emissions event (Incident No. 230209) that began on March 28, 2016 and lasted for 18 hours.

Classification: Moderate

Citation: 30 TAC Chapter 116, SubChapter B 116.115(b)(2)(F)
30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)

Rqmt Prov: General Terms and Conditions OP
Special Condition 1 PERMIT
Special Condition 17 OP
Special Condition 19 OP

Description: Failed to prevent unauthorized emissions. Specifically, the Respondent released 2,966 lbs of VOC, 2,149 lbs of CO, and 297 lbs of NOx from the PO Ground Flare, EPN POFLARE, 1,357 lbs of VOC, 2,936 lbs of CO, and 368 lbs of NOx from Flare No. 3, EPN UER037, and 607 lbs of CO, and 39 lbs of NOx collectively from Flare No. 1, EPN UER044, and Flare No. 2, EPN UER046, during an emissions event (Incident No. 239362) that began on July 19, 2016 and lasted for 48 hours.

Classification: Moderate

Citation: 30 TAC Chapter 116, SubChapter B 116.115(b)(2)(F)
30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)

Rqmt Prov: General Terms and Conditions OP
Special Condition 1 PERMIT
Special Condition 19 OP

Description: Failed to prevent unauthorized emissions. Specifically, the Respondent released 148.98 lbs of NOx and 301.63 lbs of CO from Flare Nos. 1 and 2, EPNs UER046 and UER044, respectively, and 1,580.26 lbs of VOC, 405.83 lbs of NOx, and 3,237 lbs of CO from Flare No. 3, EPN UER037, during an emissions event (Incident No. 242417) that began on August 28, 2016 and lasted for 14 hours and 39 minutes.

Classification: Moderate

Citation: 30 TAC Chapter 116, SubChapter B 116.115(b)(2)(F)
30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)

Rqmt Prov: General Terms and Conditions OP
Special Condition 1 PERMIT
Special Condition 13 PERMIT
Special Condition 19 OP

Description: Failed to prevent unauthorized emissions. Specifically, the Respondent released 5,416 lbs of VOC from the F-A3-103 DeMethanizer Pressure Relief Valve ("PRV") during an emissions event (Incident No. 242427) that began on August 28, 2016 and lasted eight minutes.

Classification: Moderate

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

30 TAC Chapter 122, SubChapter B 122.143(4)

Rqmt Prov: General Terms and Conditions OP

Special Condition 1 PERMIT

Special Condition 14 OP

Description: Failed to prevent unauthorized emissions. Specifically, the Respondent released 22,191 lbs of VOC from the F8 Ethylene Oxide Unit during emissions events (Incident Nos. 233310, 233312, and 233329) that occurred on May 15, 2016 and lasted one hour and 47 minutes and occurred on May 16, 2016 and lasted one hour and 27 minutes.

Classification: Moderate

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

Rqmt Prov: General Terms and Conditions OP

Special Condition 19 OP

Special Condition 28B PERMIT

Description: Failure to maintain the average annual flow rate for the North and Center Flares below permitted limits.

4 Effective Date: 11/28/2022 ADMINORDER 2020-1274-AIR-E (1660 Order-Agreed Order With Denial)

Classification: Moderate

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

30 TAC Chapter 122, SubChapter B 122.143(4)

5C THSC Chapter 382 382.085(b)

Rqmt Prov: NSR 20160 Special Condition 1 PERMIT

O3056 General Terms and Conditions OP

O3056 Special Condition 17 OP

Description: Failure to prevent unauthorized emissions. The Respondent released 13,459 pounds ("lbs") of volatile organic compounds ("VOC") and 41 lbs of acetone as fugitive emissions, during an emissions event (Incident No. 335200) that occurred on May 7, 2020 and lasted 15 minutes. The emissions event occurred due to an open bleeder valve in the TBA flush system and excessive vibration from excessive and cyclic flow through the TBA flush line that caused the plug on the bleeder valve to come off.

Classification: Moderate

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

30 TAC Chapter 122, SubChapter B 122.143(4)

5C THSC Chapter 382 382.085(b)

Rqmt Prov: FOP O13056 Special Condition 17 OP

FOP O3056 General Terms and Conditions OP

NSR 20160 Special Condition 1 PERMIT

Description: Failure to prevent unauthorized emissions. The Respondent released 3,759.78 lbs of VOC, 380.36 lbs of NOx, 35 lbs of acetone, and 2,771.66 lbs of CO from the Propylene Oxide ("PO") Ground Flare, EPN POFLARE, during an emissions event (Incident No. 335589) that began on May 16, 2020 and lasted 26 hours and two minutes. The emissions event occurred due to fouling in the float chamber of Level Controller Transmitter LT-2752 to fail and Compressor C-005 to safely shut down, resulting in flaring.

Classification: Moderate

Citation: 30 TAC Chapter 101, SubChapter F 101.201(b)(1)(F)

30 TAC Chapter 122, SubChapter B 122.143(4)

5C THSC Chapter 382 382.085(b)

Rqmt Prov: FOP O3056 General Terms and Conditions OP

FOP O3056 Special Condition 2F OP

Description: Failure to identify all required information on the final record for a reportable emissions event. The Respondent reported a duration of 37 hours and two minutes on the final record for Incident No. 335589, but after further review and investigation, the Respondent determined that the full duration of the emissions event was 26 hours and 2 mins.

Classification: Moderate

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

30 TAC Chapter 122, SubChapter B 122.143(4)

5C THSC Chapter 382 382.085(b)

Rqmt Prov: FOP O1320 General Terms and Conditions OP

FOP O1320 Special Condition 15 OP

FOP O3056 General Terms and Conditions OP

FOP O3056 Special Condition 17 OP

NSR 106169 Special Condition 1 PERMIT

NSR 20160 Special Condition 1 PERMIT

NSR 5952A Special Condition 1 PERMIT

NSR 5972A Special Condition 1 PERMIT

Description: Failure to prevent unauthorized emissions. The Respondent released 289.72 lbs of VOC, 70.66 lbs of NOx, 516.89 lbs of CO, and 17.72 lbs of acetone from the PO Ground Flare, EPN POFLARE, and 17,253.34 lbs of VOC as fugitive emissions from the F4 Unit (3,702.85 lbs), the F6 Unit (7,109.53 lbs), and the F8 Unit (6,440.96 lbs), during an emissions

event (Incident No. 343692) that began on October 9, 2020 and lasted eight hours. The emissions event occurred due to an area-wide power interruption

See addendum for information regarding federal actions.

B. Criminal convictions:

N/A

C. Chronic excessive emissions events:

N/A

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

Item 1	February 12, 2018	(1465800)	Item 32	March 25, 2020	(1647163)
Item 2	May 01, 2018	(1482263)	Item 33	April 03, 2020	(1632892)
Item 3	June 14, 2018	(1474203)	Item 34	April 10, 2020	(1632873)
Item 4	June 25, 2018	(1498328)	Item 35	May 08, 2020	(1646490)
Item 5	July 02, 2018	(1499106)	Item 36	June 22, 2020	(1666590)
Item 6	August 06, 2018	(1497881)	Item 38	August 14, 2020	(1664481)
Item 7	August 14, 2018	(1500326)	Item 39	August 18, 2020	(1666259)
Item 8	August 20, 2018	(1474362)	Item 40	October 14, 2020	(1666267)
Item 9	August 21, 2018	(1507534)	Item 41	October 27, 2020	(1684137)
Item 10	September 24, 2018	(1527233)	Item 42	January 15, 2021	(1690222)
Item 11	November 05, 2018	(1525865)	Item 43	May 30, 2021	(1705313)
Item 12	November 15, 2018	(1526096)	Item 44	June 03, 2021	(1705331)
Item 13	November 19, 2018	(1541426)	Item 45	June 04, 2021	(1706401)
Item 14	December 18, 2018	(1545210)	Item 46	June 08, 2021	(1706652)
Item 15	December 27, 2018	(1537332)	Item 47	June 09, 2021	(1706708)
Item 16	January 22, 2019	(1539063)	Item 48	June 25, 2021	(1735131)
Item 17	February 22, 2019	(1540687)	Item 49	November 08, 2021	(1765078)
Item 18	February 26, 2019	(1550024)	Item 50	November 16, 2021	(1762383)
Item 19	March 19, 2019	(1559604)	Item 51	November 22, 2021	(1783603)
Item 20	April 08, 2019	(1554750)	Item 52	December 07, 2021	(1764498)
Item 21	April 25, 2019	(1571807)	Item 53	December 24, 2021	(1790627)
Item 22	May 08, 2019	(1555583)	Item 54	January 20, 2022	(1798422)
Item 23	May 15, 2019	(1552240)	Item 55	February 17, 2022	(1782346)
Item 24	June 25, 2019	(1576172)	Item 56	March 14, 2022	(1782372)
Item 25	June 26, 2019	(1583224)	Item 58	May 20, 2022	(1817383)
Item 26	October 22, 2019	(1603077)	Item 59	October 20, 2022	(1804094)
Item 27	November 13, 2019	(1605757)	Item 60	November 04, 2022	(1853646)
Item 28	November 18, 2019	(1605647)	Item 62	November 18, 2022	(1859919)
Item 29	November 20, 2019	(1619031)	Item 63	December 16, 2022	(1866706)
Item 30	January 24, 2020	(1634024)	Item 64	December 20, 2022	(1866347)
Item 31	February 25, 2020	(1640643)	Item 65	January 02, 2023	(1867211)

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: 01/31/2022 (1806297)
 Self Report? YES Classification: Moderate
 Citation: 2D TWC Chapter 26, SubChapter A 26.121(a)
 30 TAC Chapter 305, SubChapter F 305.125(1)
 Description: Failure to meet the limit for one or more permit parameter

- 2 Date: 02/28/2022 (1813362)
 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

- 3 Date: 02/28/2022 (1774849)
 Self Report? NO Classification: Moderate
 Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
 30 TAC Chapter 122, SubChapter B 122.143(4)
 5C THSC Chapter 382 382.085(b)
 FOP O2286 General Terms and Conditions OP

Description: Failure to comply with permit conditions regarding the use of compounds. EIC
B18(g)(1) Mod 2D

- 4 Date: 03/31/2022 (1819934)
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: 04/01/2022 (1796299)
Self Report? NO Classification: Minor
Citation: DSPC, Pg. 3, No. 2(a) PERMIT
Description: Failure by Indorama Ventures Propylene Oxides, LLC - Port Neches Operation
(Indorama) to calibrate the flow meter at least annually to ensure accuracy.
Self Report? NO Classification: Minor
Citation: OpR, Pg. 11, No. 1 PERMIT
Description: Failure by Indorama Ventures Propylene Oxides, LLC - Port Neches Operation
(Indorama) to properly operate and maintain all systems of collection, treatment,
and disposal.
Self Report? NO Classification: Minor
Citation: OpR, Pg. 11, No. 1 PERMIT
Description: Failure by Indorama Ventures Propylene Oxides, LLC - Port Neches Operation
(Indorama) to properly operate and maintain all systems of collection, treatment,
and disposal.
Self Report? NO Classification: Minor
Citation: OpR, Pg. 11, No. 1 PERMIT
Description: Failure by Indorama Ventures Propylene Oxides, LLC - Port Neches Operation
(Indorama) to properly operate and maintain all systems of collection, treatment,
and disposal.
Self Report? NO Classification: Minor
Citation: MRR 7(c) PERMIT
Description: Failure by Indorama Ventures Oxides to report any effluent violation that deviates
from the permitted effluent limitation by more than 40% in writing to the
Regional Office and the Enforcement Division (MC 224) within 5 working days of
becoming aware of the noncompliance.
Self Report? NO Classification: Minor
Citation: MRR 3(c)(i) PERMIT
Description: Failure by Indorama Ventures Oxides (Indorama) to maintain records of
monitoring activities.
Self Report? NO Classification: Minor
Citation: MRR 3(c)(iii) PERMIT
Description: Failure by Indorama Ventures Oxides (Indorama) to maintain records of
monitoring activities.
Self Report? NO Classification: Minor
Citation: MRR 2(a) PERMIT
Description: Failure by Indorama Ventures Oxides to comply with test procedures specified in
30 TAC 319.11 - 319.12.
Self Report? NO Classification: Minor
Citation: MRR 2(a) PERMIT
Description: Failure by Indorama Ventures Oxides to comply with test procedures specified in
30 TAC 319.11 - 319.12.
Self Report? NO Classification: Minor
Citation: MRR 3(c)(vi) PERMIT
Description: Failure by Indorama Ventures Oxides to maintain records of monitoring activities.
Self Report? NO Classification: Minor
Citation: MRR 3(a) PERMIT
Description: Failure by Indorama Ventures Oxides to obtain measurements at times and in a
manner so as to be representative of the monitored activity.
Self Report? NO Classification: Minor
Citation: MRR 3(c)(vi) PERMIT
Description: Failure by Indorama Ventures Oxides to maintain records of monitoring activities.
Self Report? NO Classification: Minor
Citation: MRR 2(a) PERMIT
Description: Failure by Indorama Ventures Oxides to comply with test procedures 30 TAC
319.11 - 319.12.
Self Report? NO Classification: Moderate
Citation: ELMR 3 PERMIT
PC 2(d) PERMIT

Description: Failure by Indorama Ventures Oxides to take all reasonable steps to prevent a discharge that had a reasonable likelihood of adversely affecting human health or the environment which resulted in the discharge of visible oil.
 Self Report? NO Classification: Minor
 Citation: OpR 11(f) PERMIT

Description: Failure by Indorama Ventures Oxides to make records readily available for review by authorized representatives of the TCEQ.
 Self Report? NO Classification: Minor
 Citation: OpR 1 PERMIT

Description: Failure by Indorama Ventures Oxides to properly operate and maintain units of collection, treatment, and disposal.
 Self Report? NO Classification: Minor
 Citation: MRR 3(c)(i) PERMIT

Description: Failure by Indorama Ventures Oxides to maintain records of monitoring activities.
 Self Report? NO Classification: Moderate
 Citation: ELMR 1 PERMIT

Description: Failure by Indorama Ventures Oxides to discharge compliant effluent for oil and grease through Outfall 008.
 Self Report? NO Classification: Moderate
 Citation: ELMR 1 PERMIT

Description: Failure by Indorama Ventures Oxides to discharge compliant effluent for chemical oxygen demand at Outfall 301.
 Self Report? NO Classification: Moderate
 Citation: OT 2 PERMIT

Description: Failure by Indorama Ventures Oxides to report orally or by facsimile within 24 hours of becoming aware of the violation and a written report within five working days to the TCEQ Region 10 and the Enforcement Division (MC 224) when exceeding the daily maximum limitation of zinc.
 Self Report? NO Classification: Minor
 Citation: MRR 3(c)(v) PERMIT

Description: Failure Indorama Ventures Oxides to maintain records of monitoring activities.

6 Date: 04/30/2022 (1828774)
 Self Report? YES Classification: Moderate
 Citation: 2D TWC Chapter 26, SubChapter A 26.121(a)
 30 TAC Chapter 305, SubChapter F 305.125(1)
 Description: Failure to meet the limit for one or more permit parameter

7 Date: 05/31/2022 (1835064)
 Self Report? YES Classification: Moderate
 Citation: 2D TWC Chapter 26, SubChapter A 26.121(a)
 30 TAC Chapter 305, SubChapter F 305.125(1)
 Description: Failure to meet the limit for one or more permit parameter

8 Date: 06/30/2022 (1842270)
 Self Report? YES Classification: Moderate
 Citation: 2D TWC Chapter 26, SubChapter A 26.121(a)
 30 TAC Chapter 305, SubChapter F 305.125(1)
 Description: Failure to meet the limit for one or more permit parameter

9 Date: 07/31/2022 (1848404)
 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

10 Date: 08/10/2022 (1832699)
 Self Report? NO Classification: Moderate
 Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
 30 TAC Chapter 122, SubChapter B 122.143(4)
 5C THSC Chapter 382 382.085(b)
 FOP O2288 GTC OP
 FOP O2288 SC 19 OP
 NSR 19823 SC 25F PERMIT
 Description: Failure to maintain wastewater carbon bed Volatile Organic Compounds (VOC) concentrations below permitted limits. EIC B18(g)(1) Mod 2D
 Self Report? NO Classification: Moderate
 Citation: 30 TAC Chapter 101, SubChapter A 101.20(3)
 30 TAC Chapter 116, SubChapter B 116.115(c)
 30 TAC Chapter 122, SubChapter B 122.143(4)

5C THSC Chapter 382 382.085(b)
 FOP O2288 GTC OP
 FOP O2288 SC 19 OP
 NSR 16909 & PSDTX780 SC 1 PERMIT
 NSR 16909 & PSDTX780 SC 4 PERMIT
 Description: Failure to comply with permitted emissions rates for the Cogen Unit 1, EPN CG1.
 EIC B18(g)(1) Mod 2D
 Self Report? NO Classification: Moderate
 Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
 30 TAC Chapter 122, SubChapter B 122.143(4)
 5C THSC Chapter 382 382.085(b)
 FOP O2288 GTC OP
 FOP O2288 SC 19 OP
 NSR 19823 SC 19B PERMIT
 Description: Failure to maintain Cooling Tower EPN CT-4 Total Dissolved Solids (TDS) below
 permitted limits. EIC B18(g)(1) Mod 2D
 Self Report? NO Classification: Moderate
 Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
 30 TAC Chapter 122, SubChapter B 122.143(4)
 5C THSC Chapter 382 382.085(b)
 FOP O2288 GTC OP
 FOP O2288 SC 19 OP
 NSR 19823 SC 10F PERMIT
 Description: Failure to maintain flare heat inputs below the maximum combined limit for the
 North/Center Flares, EPNs UER044 and UER046, as required. EIC B18(g)(1)
 Mod 2D
 Self Report? NO Classification: Moderate
 Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
 30 TAC Chapter 122, SubChapter B 122.143(4)
 5C THSC Chapter 382 382.085(b)
 FOP O2288 GTC OP
 FOP O2288 SC 19 OP
 NSR 19823 SC 10F PERMIT
 Description: Failure to maintain flare heat inputs below the maximum limit for the South Flare,
 EPN UER037, as required. EIC B18(g)(1) Mod 2D
 Self Report? NO Classification: Moderate
 Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
 30 TAC Chapter 122, SubChapter B 122.143(4)
 5C THSC Chapter 382 382.085(b)
 FOP O2288 GTC OP
 FOP O2288 SC 19 OP
 NSR 19823 SC 1 PERMIT
 NSR 19823 SC 13A PERMIT
 NSR 19823 SC 8 PERMIT
 Description: Failure to comply with permitted emissions rates for the Waste Heat Boiler, EPN
 A3HA35. EIC B18(g)(1) Mod 2D
 Self Report? NO Classification: Moderate
 Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
 30 TAC Chapter 122, SubChapter B 122.143(4)
 5C THSC Chapter 382 382.085(b)
 FOP O2288 GTC OP
 FOP O2288 SC 19 OP
 NSR 49247 SC 3 PERMIT
 Description: Failure to maintain the minimum concentration in the aeration basins as required.
 EIC B18(g)(1) Mod 2D
 Self Report? NO Classification: Moderate
 Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
 30 TAC Chapter 122, SubChapter B 122.143(4)
 40 CFR Chapter 60, SubChapter C, PT 60, SubPT A 60.18(c)(3)(ii)
 5C THSC Chapter 382 382.085(b)
 FOP O2288 GTC OP
 FOP O2288 SC 19 OP
 FOP O2288 SC 1A OP
 NSR 19823 SC 10A PERMIT
 Description: Failure to maintain the minimum heating value for the South Flare, EPN UER037.
 EIC B18(g)(1) Mod 2D
 Self Report? NO Classification: Moderate
 Citation: 30 TAC Chapter 122, SubChapter B 122.143(4)
 30 TAC Chapter 122, SubChapter B 122.145(2)(A)
 5C THSC Chapter 382 382.085(b)
 FOP O2288 GTC OP
 Description: Failure to report deviations on a deviation report. EIC B3 MOD 2G

Self Report? NO Classification: Moderate
Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)
5C THSC Chapter 382 382.085(b)
FOP O1320 SC 16 OP
NSR 5952A SC 14B PERMIT
O1320 GTC OP

Description: Failure to maintain the F6 Incinerator within the permitted temperature limit as required. EIC B18(g)(1) Mod 2D

Self Report? NO Classification: Moderate

Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)
5C THSC Chapter 382 382.085(b)
FOP O1320 GTC PERMIT
FOP O1320 SC 16 OP
NSR 5972A SC 4 PERMIT

Description: Failure to maintain the F4 Incinerator within the permitted temperature limit as required. EIC B18(g)(1) Mod 2D

Self Report? NO Classification: Moderate

Citation: 30 TAC Chapter 122, SubChapter B 122.143(4)
30 TAC Chapter 122, SubChapter B 122.145(2)(A)
5C THSC Chapter 382 382.085(b)
O1320 GTC OP

Description: Failure to report deviations on a deviation report. EIC B3 MOD 2G

12 Date: 08/30/2022 (1833615)

Self Report? NO Classification: Moderate

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

30 TAC Chapter 122, SubChapter B 122.143(4)
5C THSC Chapter 382 382.085(b)
NSR 20160 SC 1 PERMIT
NSR 20160 SC 10A PERMIT
NSR 20160 SC 10D PERMIT
O3056 GTC OP
O3056 SC 17 OP

Description: Failure to comply with permitted emissions rates for Boilers H-K2-001 and H-K2-002, EPN STEAMGEN. EIC B18(g)(1) Mod 2D

Self Report? NO Classification: Moderate

Citation: 30 TAC Chapter 116, SubChapter B 116.115(b)(2)(F)
30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)
5C THSC Chapter 382 382.085(b)
FOP O3056 GTC OP
FOP O3056 SC 17 OP
NSR 20160 SC 1 PERMIT
NSR 20160 SC 12E PERMIT
SC 12B PERMIT

Description: Failure to comply with permitted emissions rates for Boiler H-K2-003, EPN HK-F5-003. EIC B18(g)(1) Mod 2D

Self Report? NO Classification: Moderate

Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)
5C THSC Chapter 382 382.085(b)
FOP O3056 GTC OP
FOP O3056 SC 17 OP
NSR 20160 SC 14A PERMIT
NSR 20160 SC 14I PERMIT

Description: Failure to comply with permitted emissions rates for Boiler H-K2-004, EPN HK-F5-004. EIC B18(g)(1) Mod 2D

Self Report? NO Classification: Moderate

Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)
40 CFR Chapter 60, SubChapter C, PT 60, SubPT Kb 60.113b(a)(2)
5C THSC Chapter 382 382.085(b)
FOP O3056 GTC OP
FOP O3056 SC 17 OP
FOP O3056 SC 1A OP
NSR 20160 SC 30B PERMIT

Description: Failure to conduct an annual inspection on a floating roof tank as required. EIC B18(g)(1) Mod 2D

Self Report? NO Classification: Moderate

Citation: 30 TAC Chapter 106, SubChapter A 106.4(a)(6)
 30 TAC Chapter 116, SubChapter B 116.115(b)
 30 TAC Chapter 122, SubChapter B 122.143(4)
 5C THSC Chapter 382 382.085(b)
 FOP O3056 GTC OP
 FOP O3056 SC 18 OP
 PBR 161628 GTC PERMIT

Description: Failure to submit notification of tank construction on time as required. EIC B3
 Mod 2B

Self Report? NO Classification: Moderate

Citation: 30 TAC Chapter 122, SubChapter B 122.143(4)
 30 TAC Chapter 122, SubChapter B 122.145(2)(A)
 5C THSC Chapter 382 382.085(b)
 FOP O3056 GTC OP

Description: Failure to report deviations on a deviation report as required. EIC B3 MOD
 2G

Self Report? NO Classification: Moderate

Citation: 30 TAC Chapter 101, SubChapter F 101.201(b)(2)
 30 TAC Chapter 116, SubChapter B 116.115(c)
 30 TAC Chapter 122, SubChapter B 122.143(4)
 5C THSC Chapter 382 382.085(b)
 FOP O3056 GTC OP
 FOP O3056 SC 17 OP
 FOP O3056 SC 2F OP
 NSR 20160 GTC 9 PERMIT

Description: Failure to create an accurate final record of non-reportable emissions events. EIC
 B3 Mod 2B

13 Date: 08/31/2022 (1856200)
 Self Report? YES Classification: Moderate

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

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

14 Date: 09/30/2022 (1862558)
 Self Report? YES Classification: Moderate

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

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

F. Environmental audits:

Notice of Intent Date: 05/28/2018 (1490235)

Disclosure Date: 07/26/2018

Viol. Classification: Moderate

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

Rqmt Prov: PERMIT Special Conditions No. 10.D.
 PERMIT Special Conditions No. 10.E.

Description: Although installed by the compliance date, the BTU analyzers were not capturing and analyzing data as required by Special Condition 10.

Disclosure Date: 09/11/2018

Viol. Classification: Moderate

Citation: 30 TAC Chapter 115, SubChapter D 115.354(4)

Description: Failed to monitor pressure relief valves that vented on January 8, 2018 and January 17, 2018 within 24 hours after the release.

Disclosure Date: 03/08/2019

Viol. Classification: Moderate

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

Rqmt Prov: PERMIT Special Condition No. 1

Description: Failed to route emissions from the G6 Glycol Unit's 4th Effect Tower vent as represented in the permit.

Viol. Classification: Moderate

Citation: 30 TAC Chapter 101, SubChapter F 101.201(a)
 30 TAC Chapter 116, SubChapter B 116.110
 30 TAC Chapter 122, SubChapter B 122.143(4)
 30 TAC Chapter 122, SubChapter B 122.145(2)(A)

Rqmt Prov: PERMIT General Terms and Conditions

Description: Failed to report an emissions event. Specifically, it was determined during a records review that a

reportable amount of NOx released during what was initially calculated to be a recordable event on January 2, 2018. Additionally, the unreported event was not included in the semi-annual deviation report.

Viol. Classification: Moderate

Citation: 30 TAC Chapter 101, SubChapter F 101.201(a)
30 TAC Chapter 116, SubChapter B 116.110
30 TAC Chapter 122, SubChapter B 122.143(4)
30 TAC Chapter 122, SubChapter B 122.145(2)(A)

Rqmt Prov: PERMIT General Terms and Conditions

Description: Failed to identify emissions from flaring at the A3 Unit associated with an event that occurred on March 10, 2018 that resulted in a shutdown of the F4 Unit. As a result, CO and NOx emissions exceeded permit limits, but were not included in the recordable event. Additionally, the unreported emissions were not included in the semi-annual deviation report.

Notice of Intent Date: 09/27/2019 (1602679)

Disclosure Date: 12/18/2019

Viol. Classification: Moderate

Citation: 30 TAC Chapter 101, SubChapter A 101.20(2)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT A 63.10(b)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT G 63.151(j)

Description: Failed to report and maintain documentation for updated Hazardous Organic NESHAP (HON) applicability for F4, F6, and F5 operating units.

Viol. Classification: Moderate

Citation: 30 TAC Chapter 101, SubChapter A 101.20(2)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT F 63.100
40 CFR Chapter 63, SubChapter C, PT 63, SubPT G 63.151(j)

Description: Failed to update the Notification of Compliance Status to reflect revised applicability for F4, F6, and F5 operating units.

Viol. Classification: Moderate

Citation: 30 TAC Chapter 101, SubChapter A 101.20(2)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT A 63.10(b)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT G 63.151(j)

Description: Failed to report and maintain detailed applicability documentation for group status determinations of the F8 operating unit.

Viol. Classification: Moderate

Citation: 30 TAC Chapter 101, SubChapter A 101.20(2)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT G 63.152(b)

Description: Failed to update and submit Notice of Compliance Status documentation for the F8 operating unit.

Viol. Classification: Moderate

Citation: 30 TAC Chapter 101, SubChapter A 101.20(2)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT G 63.115
40 CFR Chapter 63, SubChapter C, PT 63, SubPT G 63.115(a)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT G 63.115(b)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT G 63.115(c)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT G 63.115(d)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT G 63.115(e)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT G 63.115(f)

Description: Failed to maintain consistent documentation for the CO2 Vents associated with F4, F6, and F8 operating units and which adequately demonstrates Group 2 status as required.

Viol. Classification: Moderate

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

Rqmt Prov: PERMIT General Condition 1
PERMIT General Requirements 1

Description: Failed to provide accurate permit representations. Specifically, permitted maximum emissions rates for CO2 vents and wastewater fugitives are higher than actual emissions and do not align with existing Hazardous Organic NESHAP applicability determinations.

Viol. Classification: Moderate

Citation: 30 TAC Chapter 101, SubChapter A 101.20(2)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT G 63.132(a)(1)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT G 63.132(c)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT G 63.144(b)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT G 63.144(c)

Description: Failed to maintain detailed applicability documentation for several Hazardous Organic NESHAP wastewater Points of Determination.

Viol. Classification: Moderate

Citation: 30 TAC Chapter 101, SubChapter A 101.20(2)
40 CFR Part 63, Subpart G 63.132(a)(2)(i)

Description: Failed to identify all Hazardous Organic NESHAP waste management units managing HON Group 1 Wastewater Streams.

Viol. Classification: Moderate

Citation: 30 TAC Chapter 101, SubChapter A 101.20(2)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT G 63.143(a)

Description: Failed to update documentation for Table 11 semiannual inspections for HON waste management units.

Viol. Classification: Moderate

Citation: 30 TAC Chapter 101, SubChapter A 101.20(2)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT G 63.148(i)

Description: Failed to update documentation for annual visual inspections for HON closed vent systems.

Viol. Classification: Moderate

Citation: 30 TAC Chapter 101, SubChapter A 101.20(2)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT G 63.110(d)

Description: Failed to prevent an incorrect application of overlap for process vents between 40 CFR Part 60, NSPS NNN/RRR and 40 CFR Part 63, Subparts F and G.

G. Type of environmental management systems (EMSs):

N/A

H. Voluntary on-site compliance assessment dates:

N/A

I. Participation in a voluntary pollution reduction program:

N/A

J. Early compliance:

N/A

Sites Outside of Texas:

N/A



Compliance History Report

Compliance History Report for CN602266140, RN100219252, Rating Year 2022 which includes Compliance History (CH) components from September 1, 2017, through August 31, 2022.

Customer, Respondent, or Owner/Operator:	CN602266140, Indorama Ventures Propylene Oxides LLC	Classification:	SATISFACTORY	Rating:	3.08
Regulated Entity:	RN100219252, PORT NECHES OPERATIONS	Classification:	SATISFACTORY	Rating:	3.08
Complexity Points:	47	Repeat Violator:	NO		
CH Group:	05 - Chemical Manufacturing				
Location:	2701 Spur 136 in Port Neches, Jefferson County, Texas				
TCEQ Region:	REGION 10 - BEAUMONT				

ID Number(s):

AIR OPERATING PERMITS ACCOUNT NUMBER JE0052V

AIR OPERATING PERMITS PERMIT 2286

AIR OPERATING PERMITS PERMIT 2288

AIR NEW SOURCE PERMITS AFS NUM 4824500006

AIR NEW SOURCE PERMITS REGISTRATION 51736

AIR NEW SOURCE PERMITS REGISTRATION 54551

AIR NEW SOURCE PERMITS REGISTRATION 44034

AIR NEW SOURCE PERMITS REGISTRATION 45090

AIR NEW SOURCE PERMITS REGISTRATION 45277

AIR NEW SOURCE PERMITS REGISTRATION 47065

AIR NEW SOURCE PERMITS REGISTRATION 47555

AIR NEW SOURCE PERMITS REGISTRATION 47887

AIR NEW SOURCE PERMITS REGISTRATION 48176

AIR NEW SOURCE PERMITS REGISTRATION 49493

AIR NEW SOURCE PERMITS PERMIT 647B

AIR NEW SOURCE PERMITS PERMIT 5952A

AIR NEW SOURCE PERMITS REGISTRATION 7761

AIR NEW SOURCE PERMITS PERMIT 19823

AIR NEW SOURCE PERMITS PERMIT 20160

AIR NEW SOURCE PERMITS REGISTRATION 31443

AIR NEW SOURCE PERMITS REGISTRATION 36453

AIR NEW SOURCE PERMITS REGISTRATION 40103

AIR NEW SOURCE PERMITS REGISTRATION 41444

AIR NEW SOURCE PERMITS REGISTRATION 41757

AIR NEW SOURCE PERMITS REGISTRATION 42153

AIR NEW SOURCE PERMITS REGISTRATION 75597

AIR NEW SOURCE PERMITS REGISTRATION 75748

AIR NEW SOURCE PERMITS REGISTRATION 55753

AIR NEW SOURCE PERMITS PERMIT 56390

AIR NEW SOURCE PERMITS REGISTRATION 70571

AIR NEW SOURCE PERMITS REGISTRATION 70726

AIR NEW SOURCE PERMITS REGISTRATION 56073

AIR NEW SOURCE PERMITS REGISTRATION 54219

AIR NEW SOURCE PERMITS REGISTRATION 72310

AIR NEW SOURCE PERMITS REGISTRATION 54570

AIR NEW SOURCE PERMITS REGISTRATION 71751

AIR NEW SOURCE PERMITS REGISTRATION 50360

AIR NEW SOURCE PERMITS REGISTRATION 72907

AIR NEW SOURCE PERMITS REGISTRATION 75203

AIR NEW SOURCE PERMITS REGISTRATION 76732

AIR NEW SOURCE PERMITS REGISTRATION 78974

AIR OPERATING PERMITS PERMIT 1320

AIR OPERATING PERMITS PERMIT 2287

AIR OPERATING PERMITS PERMIT 3056

AIR NEW SOURCE PERMITS PERMIT 29516

AIR NEW SOURCE PERMITS REGISTRATION 52715

AIR NEW SOURCE PERMITS REGISTRATION 54565

AIR NEW SOURCE PERMITS REGISTRATION 44434

AIR NEW SOURCE PERMITS REGISTRATION 45094

AIR NEW SOURCE PERMITS REGISTRATION 46791

AIR NEW SOURCE PERMITS REGISTRATION 47066

AIR NEW SOURCE PERMITS REGISTRATION 47577

AIR NEW SOURCE PERMITS REGISTRATION 48178

AIR NEW SOURCE PERMITS PERMIT 49247

AIR NEW SOURCE PERMITS ACCOUNT NUMBER JE0052V

AIR NEW SOURCE PERMITS PERMIT 5807A

AIR NEW SOURCE PERMITS PERMIT 5972A

AIR NEW SOURCE PERMITS PERMIT 16909

AIR NEW SOURCE PERMITS PERMIT 20134

AIR NEW SOURCE PERMITS REGISTRATION 23568

AIR NEW SOURCE PERMITS PERMIT 36646

AIR NEW SOURCE PERMITS REGISTRATION 39725

AIR NEW SOURCE PERMITS REGISTRATION 40527

AIR NEW SOURCE PERMITS REGISTRATION 41301

AIR NEW SOURCE PERMITS REGISTRATION 42103

AIR NEW SOURCE PERMITS REGISTRATION 42154

AIR NEW SOURCE PERMITS REGISTRATION 76018

AIR NEW SOURCE PERMITS PERMIT 83816

AIR NEW SOURCE PERMITS REGISTRATION 70024

AIR NEW SOURCE PERMITS REGISTRATION 56243

AIR NEW SOURCE PERMITS REGISTRATION 70781

AIR NEW SOURCE PERMITS REGISTRATION 53551

AIR NEW SOURCE PERMITS REGISTRATION 70011

AIR NEW SOURCE PERMITS REGISTRATION 53979

AIR NEW SOURCE PERMITS REGISTRATION 54231

AIR NEW SOURCE PERMITS REGISTRATION 54234

AIR NEW SOURCE PERMITS REGISTRATION 52077

AIR NEW SOURCE PERMITS REGISTRATION 73663

AIR NEW SOURCE PERMITS REGISTRATION 74296

AIR NEW SOURCE PERMITS REGISTRATION 75202

AIR NEW SOURCE PERMITS REGISTRATION 77129

AIR NEW SOURCE PERMITS REGISTRATION 79529

AIR NEW SOURCE PERMITS REGISTRATION 80149
AIR NEW SOURCE PERMITS REGISTRATION 81531
AIR NEW SOURCE PERMITS REGISTRATION 82922
AIR NEW SOURCE PERMITS EPA PERMIT PSDTX780
AIR NEW SOURCE PERMITS REGISTRATION 139463
AIR NEW SOURCE PERMITS REGISTRATION 110757
AIR NEW SOURCE PERMITS REGISTRATION 110787
AIR NEW SOURCE PERMITS REGISTRATION 110808
AIR NEW SOURCE PERMITS REGISTRATION 150790
AIR NEW SOURCE PERMITS REGISTRATION 153791
AIR NEW SOURCE PERMITS REGISTRATION 152840
AIR NEW SOURCE PERMITS REGISTRATION 154036
AIR NEW SOURCE PERMITS REGISTRATION 164694
AIR NEW SOURCE PERMITS REGISTRATION 168479
AIR NEW SOURCE PERMITS REGISTRATION 169413
AIR NEW SOURCE PERMITS REGISTRATION 164877
AIR NEW SOURCE PERMITS REGISTRATION 167574
AIR NEW SOURCE PERMITS REGISTRATION 170963
AIR NEW SOURCE PERMITS REGISTRATION 163874
AIR NEW SOURCE PERMITS REGISTRATION 142196
AIR NEW SOURCE PERMITS REGISTRATION 148227
AIR NEW SOURCE PERMITS REGISTRATION 150168
AIR NEW SOURCE PERMITS REGISTRATION 156133
AIR NEW SOURCE PERMITS REGISTRATION 155871
AIR NEW SOURCE PERMITS REGISTRATION 160459
AIR NEW SOURCE PERMITS REGISTRATION 155472
AIR NEW SOURCE PERMITS REGISTRATION 161628
AIR NEW SOURCE PERMITS REGISTRATION 152402
AIR NEW SOURCE PERMITS REGISTRATION 155384
AIR NEW SOURCE PERMITS REGISTRATION 155634
PETROLEUM STORAGE TANK REGISTRATION
REGISTRATION 40711
IHW CORRECTIVE ACTION SOLID WASTE REGISTRATION
(SWR) 30029
WASTEWATER EPA ID TX0005070
POLLUTION PREVENTION PLANNING ID NUMBER
P00679
INDUSTRIAL AND HAZARDOUS WASTE PERMIT 50363

INDUSTRIAL AND HAZARDOUS WASTE EPA ID
TXD008076846
TAX RELIEF ID NUMBER 17954
TAX RELIEF ID NUMBER 17984
TAX RELIEF ID NUMBER 17095
TAX RELIEF ID NUMBER 17093
TAX RELIEF ID NUMBER 17940
TAX RELIEF ID NUMBER 17977
TAX RELIEF ID NUMBER 18835
TAX RELIEF ID NUMBER 17985
TAX RELIEF ID NUMBER 24379

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

Date Compliance History Report Prepared: January 10, 2023

Agency Decision Requiring Compliance History: Enforcement

Component Period Selected: January 10, 2018 to January 10, 2023

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

Name: Harley Hobson

Phone: (512) 239-1337

Site and Owner/Operator History:

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

AIR NEW SOURCE PERMITS REGISTRATION 80702
AIR NEW SOURCE PERMITS REGISTRATION 81415
AIR NEW SOURCE PERMITS REGISTRATION 92256
AIR NEW SOURCE PERMITS REGISTRATION 91994
AIR NEW SOURCE PERMITS PERMIT 106169
AIR NEW SOURCE PERMITS REGISTRATION 109215
AIR NEW SOURCE PERMITS REGISTRATION 110809
AIR NEW SOURCE PERMITS REGISTRATION 110813
AIR NEW SOURCE PERMITS REGISTRATION 150484
AIR NEW SOURCE PERMITS REGISTRATION 150307
AIR NEW SOURCE PERMITS REGISTRATION 152982
AIR NEW SOURCE PERMITS REGISTRATION 163020
AIR NEW SOURCE PERMITS REGISTRATION 169507
AIR NEW SOURCE PERMITS REGISTRATION 164604
AIR NEW SOURCE PERMITS REGISTRATION 166541
AIR NEW SOURCE PERMITS REGISTRATION 167060
AIR NEW SOURCE PERMITS REGISTRATION 170571
AIR NEW SOURCE PERMITS REGISTRATION 169228
AIR NEW SOURCE PERMITS REGISTRATION 166117
AIR NEW SOURCE PERMITS REGISTRATION 151107
AIR NEW SOURCE PERMITS REGISTRATION 143027
AIR NEW SOURCE PERMITS REGISTRATION 150992
AIR NEW SOURCE PERMITS PERMIT 79802
AIR NEW SOURCE PERMITS REGISTRATION 160594
AIR NEW SOURCE PERMITS REGISTRATION 159322
AIR NEW SOURCE PERMITS REGISTRATION 161151
AIR NEW SOURCE PERMITS REGISTRATION 157572
AIR NEW SOURCE PERMITS REGISTRATION 160045
AIR NEW SOURCE PERMITS REGISTRATION 160606
AIR NEW SOURCE PERMITS REGISTRATION 171239
PETROLEUM STORAGE TANK REGISTRATION
REGISTRATION 79935
WASTEWATER PERMIT WQ0000511000
AIR EMISSIONS INVENTORY ACCOUNT NUMBER JE0052V
INDUSTRIAL AND HAZARDOUS WASTE PERMIT 50055
INDUSTRIAL AND HAZARDOUS WASTE EPA ID
TX0000201202
INDUSTRIAL AND HAZARDOUS WASTE SOLID WASTE
REGISTRATION # (SWR) 30029
TAX RELIEF ID NUMBER 17974
TAX RELIEF ID NUMBER 17986
TAX RELIEF ID NUMBER 17100
TAX RELIEF ID NUMBER 17975
TAX RELIEF ID NUMBER 17983
TAX RELIEF ID NUMBER 18840
TAX RELIEF ID NUMBER 17970
TAX RELIEF ID NUMBER 17088

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

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

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

- 1 Effective Date: 05/04/2018 ADMINORDER 2016-1709-IWD-E (1660 Order-Agreed Order With Denial)
Classification: Major
Citation: 2D TWC Chapter 26, SubChapter A 26.121(a)(1)
30 TAC Chapter 305, SubChapter F 305.125(1)
Rqmt Prov: Effluent Limits PERMIT
Description: Failed to comply with permitted effluent limitations, in violation of TEX. WATER CODE § 26.121(a)(1), 30 TEX. ADMIN. CODE § 305.125(1), and Texas Pollutant Discharge Elimination System ("TPDES") Permit No. WQ0000511000, Effluent Limitations and Monitoring Requirements No. 1, Outfall Nos. 001, 003 and 301 and Effluent Limitations and Monitoring Requirements No. 2, Outfall No. 009

- 2 Effective Date: 10/08/2018 ADMINORDER 2017-1219-AIR-E (1660 Order-Agreed Order With Denial)
Classification: Moderate
Citation: 30 TAC Chapter 116, SubChapter B 116.115(b)(2)(F)
30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)
5C THSC Chapter 382 382.085(b)
Rqmt Prov: General Terms and Conditions OP
Special Condition 1 PERMIT
Special Condition 14 OP
Description: Failure to prevent unauthorized emissions to the atmosphere during an emissions event that occurred on September 23, 2016, TCEQ/STEERS Incident No. 244445.
Classification: Moderate
Citation: 30 TAC Chapter 116, SubChapter B 116.115(b)(2)(F)
30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)
5C THSC Chapter 382 382.085(b)
Rqmt Prov: General Terms and Conditions OP
Special Condition 1 PERMIT
Special Condition 19 OP
Description: Failure to prevent unauthorized emissions to the atmosphere during an emissions event that occurred on October 20, 2016, TCEQ/STEERS Incident No. 245872.
Classification: Moderate
Citation: 30 TAC Chapter 116, SubChapter B 116.115(b)(2)(F)
30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)
5C THSC Chapter 382 382.085(b)
Rqmt Prov: General Terms and Conditions OP
Special Condition 1 PERMIT
Special Condition 17 OP
Description: Failure to prevent unauthorized emissions to the atmosphere during an emissions event that occurred on March 17, 2017, TCEQ Incident 254371.

- 3 Effective Date: 10/27/2020 ADMINORDER 2016-1906-AIR-E (1660 Order-Agreed Order With Denial)
Classification: Moderate
Citation: 30 TAC Chapter 116, SubChapter B 116.115(b)(2)(F)
30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)
Rqmt Prov: General Terms and Conditions OP
Special Condition 1 PERMIT
Special Condition 14 OP
Special Condition 17 OP
Special Condition 19 OP
Description: Failed to prevent unauthorized emissions. Specifically, the Respondent released 175.47 pounds ("lbs") of volatile organic compounds ("VOC") from the F6 Reabsorber Vent during an emissions event (Incident No. 222751) that began on November 7, 2015 and lasted 24 hours.
Classification: Moderate

Citation: 30 TAC Chapter 101, SubChapter F 101.201(b)(1)(H)
30 TAC Chapter 122, SubChapter B 122.143(4)

Rqmt Prov: General Terms and Conditions OP
Special Condition 2F OP

Description: Failure to provide the estimated total quantities of all compounds or mixtures of air contaminants released during an emissions event in the final records (TCEQ/STEERS Incident No. 222751).

Classification: Moderate

Citation: 30 TAC Chapter 116, SubChapter B 116.115(b)(2)(F)
30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)

Rqmt Prov: General Terms and Conditions OP
Special Condition 1 PERMIT
Special Condition 14 OP

Description: Failed to prevent unauthorized emissions. Specifically, the Respondent released 366 lbs of VOC from the F6 Reabsorber Vent during an emissions event (Incident No. 227974) that began on February 18, 2016 and lasted for 16 minutes.

Classification: Moderate

Citation: 30 TAC Chapter 116, SubChapter B 116.115(b)(2)(F)
30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)

Rqmt Prov: General Terms and Conditions OP
Special Condition 1 PERMIT
Special Condition 14 OP

Description: Failed to prevent unauthorized emissions. Specifically, the Respondent released 12,150.14 lbs of VOC from the F6 Reabsorber Vent during an emissions event (Incident No. 230209) that began on March 28, 2016 and lasted for 18 hours.

Classification: Moderate

Citation: 30 TAC Chapter 116, SubChapter B 116.115(b)(2)(F)
30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)

Rqmt Prov: General Terms and Conditions OP
Special Condition 1 PERMIT
Special Condition 17 OP
Special Condition 19 OP

Description: Failed to prevent unauthorized emissions. Specifically, the Respondent released 2,966 lbs of VOC, 2,149 lbs of CO, and 297 lbs of NOx from the PO Ground Flare, EPN POFLARE, 1,357 lbs of VOC, 2,936 lbs of CO, and 368 lbs of NOx from Flare No. 3, EPN UER037, and 607 lbs of CO, and 39 lbs of NOx collectively from Flare No. 1, EPN UER044, and Flare No. 2, EPN UER046, during an emissions event (Incident No. 239362) that began on July 19, 2016 and lasted for 48 hours.

Classification: Moderate

Citation: 30 TAC Chapter 116, SubChapter B 116.115(b)(2)(F)
30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)

Rqmt Prov: General Terms and Conditions OP
Special Condition 1 PERMIT
Special Condition 19 OP

Description: Failed to prevent unauthorized emissions. Specifically, the Respondent released 148.98 lbs of NOx and 301.63 lbs of CO from Flare Nos. 1 and 2, EPNs UER046 and UER044, respectively, and 1,580.26 lbs of VOC, 405.83 lbs of NOx, and 3,237 lbs of CO from Flare No. 3, EPN UER037, during an emissions event (Incident No. 242417) that began on August 28, 2016 and lasted for 14 hours and 39 minutes.

Classification: Moderate

Citation: 30 TAC Chapter 116, SubChapter B 116.115(b)(2)(F)
30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)

Rqmt Prov: General Terms and Conditions OP
Special Condition 1 PERMIT
Special Condition 13 PERMIT
Special Condition 19 OP

Description: Failed to prevent unauthorized emissions. Specifically, the Respondent released 5,416 lbs of VOC from the F-A3-103 DeMethanizer Pressure Relief Valve ("PRV") during an emissions event (Incident No. 242427) that began on August 28, 2016 and lasted eight minutes.

Classification: Moderate

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

30 TAC Chapter 122, SubChapter B 122.143(4)

Rqmt Prov: General Terms and Conditions OP

Special Condition 1 PERMIT

Special Condition 14 OP

Description: Failed to prevent unauthorized emissions. Specifically, the Respondent released 22,191 lbs of VOC from the F8 Ethylene Oxide Unit during emissions events (Incident Nos. 233310, 233312, and 233329) that occurred on May 15, 2016 and lasted one hour and 47 minutes and occurred on May 16, 2016 and lasted one hour and 27 minutes.

Classification: Moderate

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

Rqmt Prov: General Terms and Conditions OP

Special Condition 19 OP

Special Condition 28B PERMIT

Description: Failure to maintain the average annual flow rate for the North and Center Flares below permitted limits.

4 Effective Date: 11/28/2022 ADMINORDER 2020-1274-AIR-E (1660 Order-Agreed Order With Denial)

Classification: Moderate

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

30 TAC Chapter 122, SubChapter B 122.143(4)

5C THSC Chapter 382 382.085(b)

Rqmt Prov: NSR 20160 Special Condition 1 PERMIT

O3056 General Terms and Conditions OP

O3056 Special Condition 17 OP

Description: Failure to prevent unauthorized emissions. The Respondent released 13,459 pounds ("lbs") of volatile organic compounds ("VOC") and 41 lbs of acetone as fugitive emissions, during an emissions event (Incident No. 335200) that occurred on May 7, 2020 and lasted 15 minutes. The emissions event occurred due to an open bleeder valve in the TBA flush system and excessive vibration from excessive and cyclic flow through the TBA flush line that caused the plug on the bleeder valve to come off.

Classification: Moderate

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

30 TAC Chapter 122, SubChapter B 122.143(4)

5C THSC Chapter 382 382.085(b)

Rqmt Prov: FOP O13056 Special Condition 17 OP

FOP O3056 General Terms and Conditions OP

NSR 20160 Special Condition 1 PERMIT

Description: Failure to prevent unauthorized emissions. The Respondent released 3,759.78 lbs of VOC, 380.36 lbs of NO_x, 35 lbs of acetone, and 2,771.66 lbs of CO from the Propylene Oxide ("PO") Ground Flare, EPN POFLARE, during an emissions event (Incident No. 335589) that began on May 16, 2020 and lasted 26 hours and two minutes. The emissions event occurred due to fouling in the float chamber of Level Controller Transmitter LT-2752 to fail and Compressor C-005 to safely shut down, resulting in flaring.

Classification: Moderate

Citation: 30 TAC Chapter 101, SubChapter F 101.201(b)(1)(F)

30 TAC Chapter 122, SubChapter B 122.143(4)

5C THSC Chapter 382 382.085(b)

Rqmt Prov: FOP O3056 General Terms and Conditions OP

FOP O3056 Special Condition 2F OP

Description: Failure to identify all required information on the final record for a reportable emissions event. The Respondent reported a duration of 37 hours and two minutes on the final record for Incident No. 335589, but after further review and investigation, the Respondent determined that the full duration of the emissions event was 26 hours and 2 mins.

Classification: Moderate

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

30 TAC Chapter 122, SubChapter B 122.143(4)

5C THSC Chapter 382 382.085(b)

Rqmt Prov: FOP O1320 General Terms and Conditions OP

FOP O1320 Special Condition 15 OP

FOP O3056 General Terms and Conditions OP

FOP O3056 Special Condition 17 OP

NSR 106169 Special Condition 1 PERMIT

NSR 20160 Special Condition 1 PERMIT

NSR 5952A Special Condition 1 PERMIT

NSR 5972A Special Condition 1 PERMIT

Description: Failure to prevent unauthorized emissions. The Respondent released 289.72 lbs of VOC, 70.66 lbs of NO_x, 516.89 lbs of CO, and 17.72 lbs of acetone from the PO Ground Flare, EPN POFLARE, and 17,253.34 lbs of VOC as fugitive emissions from the F4 Unit (3,702.85 lbs), the F6 Unit (7,109.53 lbs), and the F8 Unit (6,440.96 lbs), during an emissions

event (Incident No. 343692) that began on October 9, 2020 and lasted eight hours. The emissions event occurred due to an area-wide power interruption

See addendum for information regarding federal actions.

B. Criminal convictions:

N/A

C. Chronic excessive emissions events:

N/A

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

Item 1	February 12, 2018	(1465800)	Item 32	March 25, 2020	(1647163)
Item 2	May 01, 2018	(1482263)	Item 33	April 03, 2020	(1632892)
Item 3	June 14, 2018	(1474203)	Item 34	April 10, 2020	(1632873)
Item 4	June 25, 2018	(1498328)	Item 35	May 08, 2020	(1646490)
Item 5	July 02, 2018	(1499106)	Item 36	June 22, 2020	(1666590)
Item 6	August 06, 2018	(1497881)	Item 38	August 14, 2020	(1664481)
Item 7	August 14, 2018	(1500326)	Item 39	August 18, 2020	(1666259)
Item 8	August 20, 2018	(1474362)	Item 40	October 14, 2020	(1666267)
Item 9	August 21, 2018	(1507534)	Item 41	October 27, 2020	(1684137)
Item 10	September 24, 2018	(1527233)	Item 42	January 15, 2021	(1690222)
Item 11	November 05, 2018	(1525865)	Item 43	May 30, 2021	(1705313)
Item 12	November 15, 2018	(1526096)	Item 44	June 03, 2021	(1705331)
Item 13	November 19, 2018	(1541426)	Item 45	June 04, 2021	(1706401)
Item 14	December 18, 2018	(1545210)	Item 46	June 08, 2021	(1706652)
Item 15	December 27, 2018	(1537332)	Item 47	June 09, 2021	(1706708)
Item 16	January 22, 2019	(1539063)	Item 48	June 25, 2021	(1735131)
Item 17	February 22, 2019	(1540687)	Item 49	November 08, 2021	(1765078)
Item 18	February 26, 2019	(1550024)	Item 50	November 16, 2021	(1762383)
Item 19	March 19, 2019	(1559604)	Item 51	November 22, 2021	(1783603)
Item 20	April 08, 2019	(1554750)	Item 52	December 07, 2021	(1764498)
Item 21	April 25, 2019	(1571807)	Item 53	December 24, 2021	(1790627)
Item 22	May 08, 2019	(1555583)	Item 54	January 20, 2022	(1798422)
Item 23	May 15, 2019	(1552240)	Item 55	February 17, 2022	(1782346)
Item 24	June 25, 2019	(1576172)	Item 56	March 14, 2022	(1782372)
Item 25	June 26, 2019	(1583224)	Item 58	May 20, 2022	(1817383)
Item 26	October 22, 2019	(1603077)	Item 59	October 20, 2022	(1804094)
Item 27	November 13, 2019	(1605757)	Item 60	November 04, 2022	(1853646)
Item 28	November 18, 2019	(1605647)	Item 62	November 18, 2022	(1859919)
Item 29	November 20, 2019	(1619031)	Item 63	December 16, 2022	(1866706)
Item 30	January 24, 2020	(1634024)	Item 64	December 20, 2022	(1866347)
Item 31	February 25, 2020	(1640643)	Item 65	January 02, 2023	(1867211)

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: 01/31/2022 (1806297)
 Self Report? YES Classification: Moderate
 Citation: 2D TWC Chapter 26, SubChapter A 26.121(a)
 30 TAC Chapter 305, SubChapter F 305.125(1)
 Description: Failure to meet the limit for one or more permit parameter

- 2 Date: 02/28/2022 (1813362)
 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

- 3 Date: 02/28/2022 (1774849)
 Self Report? NO Classification: Moderate
 Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
 30 TAC Chapter 122, SubChapter B 122.143(4)
 5C THSC Chapter 382 382.085(b)
 FOP O2286 General Terms and Conditions OP

Description: Failure to comply with permit conditions regarding the use of compounds. EIC
B18(g)(1) Mod 2D

- 4 Date: 03/31/2022 (1819934)
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: 04/01/2022 (1796299)
Self Report? NO Classification: Minor
Citation: DSPC, Pg. 3, No. 2(a) PERMIT
Description: Failure by Indorama Ventures Propylene Oxides, LLC - Port Neches Operation
(Indorama) to calibrate the flow meter at least annually to ensure accuracy.
Self Report? NO Classification: Minor
Citation: OpR, Pg. 11, No. 1 PERMIT
Description: Failure by Indorama Ventures Propylene Oxides, LLC - Port Neches Operation
(Indorama) to properly operate and maintain all systems of collection, treatment,
and disposal.
Self Report? NO Classification: Minor
Citation: OpR, Pg. 11, No. 1 PERMIT
Description: Failure by Indorama Ventures Propylene Oxides, LLC - Port Neches Operation
(Indorama) to properly operate and maintain all systems of collection, treatment,
and disposal.
Self Report? NO Classification: Minor
Citation: OpR, Pg. 11, No. 1 PERMIT
Description: Failure by Indorama Ventures Propylene Oxides, LLC - Port Neches Operation
(Indorama) to properly operate and maintain all systems of collection, treatment,
and disposal.
Self Report? NO Classification: Minor
Citation: MRR 7(c) PERMIT
Description: Failure by Indorama Ventures Oxides to report any effluent violation that deviates
from the permitted effluent limitation by more than 40% in writing to the
Regional Office and the Enforcement Division (MC 224) within 5 working days of
becoming aware of the noncompliance.
Self Report? NO Classification: Minor
Citation: MRR 3(c)(i) PERMIT
Description: Failure by Indorama Ventures Oxides (Indorama) to maintain records of
monitoring activities.
Self Report? NO Classification: Minor
Citation: MRR 3(c)(iii) PERMIT
Description: Failure by Indorama Ventures Oxides (Indorama) to maintain records of
monitoring activities.
Self Report? NO Classification: Minor
Citation: MRR 2(a) PERMIT
Description: Failure by Indorama Ventures Oxides to comply with test procedures specified in
30 TAC 319.11 - 319.12.
Self Report? NO Classification: Minor
Citation: MRR 2(a) PERMIT
Description: Failure by Indorama Ventures Oxides to comply with test procedures specified in
30 TAC 319.11 - 319.12.
Self Report? NO Classification: Minor
Citation: MRR 3(c)(vi) PERMIT
Description: Failure by Indorama Ventures Oxides to maintain records of monitoring activities.
Self Report? NO Classification: Minor
Citation: MRR 3(a) PERMIT
Description: Failure by Indorama Ventures Oxides to obtain measurements at times and in a
manner so as to be representative of the monitored activity.
Self Report? NO Classification: Minor
Citation: MRR 3(c)(vi) PERMIT
Description: Failure by Indorama Ventures Oxides to maintain records of monitoring activities.
Self Report? NO Classification: Minor
Citation: MRR 2(a) PERMIT
Description: Failure by Indorama Ventures Oxides to comply with test procedures 30 TAC
319.11 - 319.12.
Self Report? NO Classification: Moderate
Citation: ELMR 3 PERMIT
PC 2(d) PERMIT

Description: Failure by Indorama Ventures Oxides to take all reasonable steps to prevent a discharge that had a reasonable likelihood of adversely affecting human health or the environment which resulted in the discharge of visible oil.
 Self Report? NO Classification: Minor
 Citation: OpR 11(f) PERMIT

Description: Failure by Indorama Ventures Oxides to make records readily available for review by authorized representatives of the TCEQ.
 Self Report? NO Classification: Minor
 Citation: OpR 1 PERMIT

Description: Failure by Indorama Ventures Oxides to properly operate and maintain units of collection, treatment, and disposal.
 Self Report? NO Classification: Minor
 Citation: MRR 3(c)(i) PERMIT

Description: Failure by Indorama Ventures Oxides to maintain records of monitoring activities.
 Self Report? NO Classification: Moderate
 Citation: ELMR 1 PERMIT

Description: Failure by Indorama Ventures Oxides to discharge compliant effluent for oil and grease through Outfall 008.
 Self Report? NO Classification: Moderate
 Citation: ELMR 1 PERMIT

Description: Failure by Indorama Ventures Oxides to discharge compliant effluent for chemical oxygen demand at Outfall 301.
 Self Report? NO Classification: Moderate
 Citation: OT 2 PERMIT

Description: Failure by Indorama Ventures Oxides to report orally or by facsimile within 24 hours of becoming aware of the violation and a written report within five working days to the TCEQ Region 10 and the Enforcement Division (MC 224) when exceeding the daily maximum limitation of zinc.
 Self Report? NO Classification: Minor
 Citation: MRR 3(c)(v) PERMIT

Description: Failure Indorama Ventures Oxides to maintain records of monitoring activities.

6 Date: 04/30/2022 (1828774)
 Self Report? YES Classification: Moderate
 Citation: 2D TWC Chapter 26, SubChapter A 26.121(a)
 30 TAC Chapter 305, SubChapter F 305.125(1)
 Description: Failure to meet the limit for one or more permit parameter

7 Date: 05/31/2022 (1835064)
 Self Report? YES Classification: Moderate
 Citation: 2D TWC Chapter 26, SubChapter A 26.121(a)
 30 TAC Chapter 305, SubChapter F 305.125(1)
 Description: Failure to meet the limit for one or more permit parameter

8 Date: 06/30/2022 (1842270)
 Self Report? YES Classification: Moderate
 Citation: 2D TWC Chapter 26, SubChapter A 26.121(a)
 30 TAC Chapter 305, SubChapter F 305.125(1)
 Description: Failure to meet the limit for one or more permit parameter

9 Date: 07/31/2022 (1848404)
 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

10 Date: 08/10/2022 (1832699)
 Self Report? NO Classification: Moderate
 Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
 30 TAC Chapter 122, SubChapter B 122.143(4)
 5C THSC Chapter 382 382.085(b)
 FOP O2288 GTC OP
 FOP O2288 SC 19 OP
 NSR 19823 SC 25F PERMIT
 Description: Failure to maintain wastewater carbon bed Volatile Organic Compounds (VOC) concentrations below permitted limits. EIC B18(g)(1) Mod 2D
 Self Report? NO Classification: Moderate
 Citation: 30 TAC Chapter 101, SubChapter A 101.20(3)
 30 TAC Chapter 116, SubChapter B 116.115(c)

30 TAC Chapter 122, SubChapter B 122.143(4)
 5C THSC Chapter 382 382.085(b)
 FOP O2288 GTC OP
 FOP O2288 SC 19 OP
 NSR 16909 & PSDTX780 SC 1 PERMIT
 NSR 16909 & PSDTX780 SC 4 PERMIT
 Description: Failure to comply with permitted emissions rates for the Cogen Unit 1, EPN CG1.
 EIC B18(g)(1) Mod 2D
 Self Report? NO Classification: Moderate
 Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
 30 TAC Chapter 122, SubChapter B 122.143(4)
 5C THSC Chapter 382 382.085(b)
 FOP O2288 GTC OP
 FOP O2288 SC 19 OP
 NSR 19823 SC 19B PERMIT
 Description: Failure to maintain Cooling Tower EPN CT-4 Total Dissolved Solids (TDS) below
 permitted limits. EIC B18(g)(1) Mod 2D
 Self Report? NO Classification: Moderate
 Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
 30 TAC Chapter 122, SubChapter B 122.143(4)
 5C THSC Chapter 382 382.085(b)
 FOP O2288 GTC OP
 FOP O2288 SC 19 OP
 NSR 19823 SC 10F PERMIT
 Description: Failure to maintain flare heat inputs below the maximum combined limit for the
 North/Center Flares, EPNs UER044 and UER046, as required. EIC B18(g)(1)
 Mod 2D
 Self Report? NO Classification: Moderate
 Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
 30 TAC Chapter 122, SubChapter B 122.143(4)
 5C THSC Chapter 382 382.085(b)
 FOP O2288 GTC OP
 FOP O2288 SC 19 OP
 NSR 19823 SC 10F PERMIT
 Description: Failure to maintain flare heat inputs below the maximum limit for the South Flare,
 EPN UER037, as required. EIC B18(g)(1) Mod 2D
 Self Report? NO Classification: Moderate
 Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
 30 TAC Chapter 122, SubChapter B 122.143(4)
 5C THSC Chapter 382 382.085(b)
 FOP O2288 GTC OP
 FOP O2288 SC 19 OP
 NSR 19823 SC 1 PERMIT
 NSR 19823 SC 13A PERMIT
 NSR 19823 SC 8 PERMIT
 Description: Failure to comply with permitted emissions rates for the Waste Heat Boiler, EPN
 A3HA35. EIC B18(g)(1) Mod 2D
 Self Report? NO Classification: Moderate
 Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
 30 TAC Chapter 122, SubChapter B 122.143(4)
 5C THSC Chapter 382 382.085(b)
 FOP O2288 GTC OP
 FOP O2288 SC 19 OP
 NSR 49247 SC 3 PERMIT
 Description: Failure to maintain the minimum concentration in the aeration basins as required.
 EIC B18(g)(1) Mod 2D
 Self Report? NO Classification: Moderate
 Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
 30 TAC Chapter 122, SubChapter B 122.143(4)
 40 CFR Chapter 60, SubChapter C, PT 60, SubPT A 60.18(c)(3)(ii)
 5C THSC Chapter 382 382.085(b)
 FOP O2288 GTC OP
 FOP O2288 SC 19 OP
 FOP O2288 SC 1A OP
 NSR 19823 SC 10A PERMIT
 Description: Failure to maintain the minimum heating value for the South Flare, EPN UER037.
 EIC B18(g)(1) Mod 2D
 Self Report? NO Classification: Moderate
 Citation: 30 TAC Chapter 122, SubChapter B 122.143(4)
 30 TAC Chapter 122, SubChapter B 122.145(2)(A)
 5C THSC Chapter 382 382.085(b)
 FOP O2288 GTC OP
 Description: Failure to report deviations on a deviation report. EIC B3 MOD 2G

11 Date: 08/15/2022 (1833534)
Self Report? NO Classification: Moderate
Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)
5C THSC Chapter 382 382.085(b)
FOP O1320 SC 16 OP
NSR 5952A SC 14B PERMIT
O1320 GTC OP
Description: Failure to maintain the F6 Incinerator within the permitted temperature limit as required. EIC B18(g)(1) Mod 2D
Self Report? NO Classification: Moderate
Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)
5C THSC Chapter 382 382.085(b)
FOP O1320 GTC PERMIT
FOP O1320 SC 16 OP
NSR 5972A SC 4 PERMIT
Description: Failure to maintain the F4 Incinerator within the permitted temperature limit as required. EIC B18(g)(1) Mod 2D
Self Report? NO Classification: Moderate
Citation: 30 TAC Chapter 122, SubChapter B 122.143(4)
30 TAC Chapter 122, SubChapter B 122.145(2)(A)
5C THSC Chapter 382 382.085(b)
O1320 GTC OP
Description: Failure to report deviations on a deviation report. EIC B3 MOD 2G

12 Date: 08/30/2022 (1833615)
Self Report? NO Classification: Moderate
Citation: 30 TAC Chapter 116, SubChapter B 116.115(b)(2)(F)
30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)
5C THSC Chapter 382 382.085(b)
NSR 20160 SC 1 PERMIT
NSR 20160 SC 10A PERMIT
NSR 20160 SC 10D PERMIT
O3056 GTC OP
O3056 SC 17 OP
Description: Failure to comply with permitted emissions rates for Boilers H-K2-001 and H-K2-002, EPN STEAMGEN. EIC B18(g)(1) Mod 2D
Self Report? NO Classification: Moderate
Citation: 30 TAC Chapter 116, SubChapter B 116.115(b)(2)(F)
30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)
5C THSC Chapter 382 382.085(b)
FOP O3056 GTC OP
FOP O3056 SC 17 OP
NSR 20160 SC 1 PERMIT
NSR 20160 SC 12E PERMIT
SC 12B PERMIT
Description: Failure to comply with permitted emissions rates for Boiler H-K2-003, EPN HK-F5-003. EIC B18(g)(1) Mod 2D
Self Report? NO Classification: Moderate
Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)
5C THSC Chapter 382 382.085(b)
FOP O3056 GTC OP
FOP O3056 SC 17 OP
NSR 20160 SC 14A PERMIT
NSR 20160 SC 14I PERMIT
Description: Failure to comply with permitted emissions rates for Boiler H-K2-004, EPN HK-F5-004. EIC B18(g)(1) Mod 2D
Self Report? NO Classification: Moderate
Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)
40 CFR Chapter 60, SubChapter C, PT 60, SubPT Kb 60.113b(a)(2)
5C THSC Chapter 382 382.085(b)
FOP O3056 GTC OP
FOP O3056 SC 17 OP
FOP O3056 SC 1A OP
NSR 20160 SC 30B PERMIT
Description: Failure to conduct an annual inspection on a floating roof tank as required. EIC B18(g)(1) Mod 2D

Self Report? NO Classification: Moderate
Citation: 30 TAC Chapter 106, SubChapter A 106.4(a)(6)
30 TAC Chapter 116, SubChapter B 116.115(b)
30 TAC Chapter 122, SubChapter B 122.143(4)
5C THSC Chapter 382 382.085(b)
FOP O3056 GTC OP
FOP O3056 SC 18 OP
PBR 161628 GTC PERMIT
Description: Failure to submit notification of tank construction on time as required. EIC B3
Mod 2B

Self Report? NO Classification: Moderate
Citation: 30 TAC Chapter 122, SubChapter B 122.143(4)
30 TAC Chapter 122, SubChapter B 122.145(2)(A)
5C THSC Chapter 382 382.085(b)
FOP O3056 GTC OP
Description: Failure to report deviations on a deviation report as required. EIC B3 MOD
2G

Self Report? NO Classification: Moderate
Citation: 30 TAC Chapter 101, SubChapter F 101.201(b)(2)
30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)
5C THSC Chapter 382 382.085(b)
FOP O3056 GTC OP
FOP O3056 SC 17 OP
FOP O3056 SC 2F OP
NSR 20160 GTC 9 PERMIT
Description: Failure to create an accurate final record of non-reportable emissions events. EIC
B3 Mod 2B

13 Date: 08/31/2022 (1856200)
Self Report? YES Classification: Moderate
Citation: 2D TWC Chapter 26, SubChapter A 26.121(a)
30 TAC Chapter 305, SubChapter F 305.125(1)
Description: Failure to meet the limit for one or more permit parameter

14 Date: 09/30/2022 (1862558)
Self Report? YES Classification: Moderate
Citation: 2D TWC Chapter 26, SubChapter A 26.121(a)
30 TAC Chapter 305, SubChapter F 305.125(1)
Description: Failure to meet the limit for one or more permit parameter

F. Environmental audits:

Notice of Intent Date: 09/27/2019 (1602679)

Disclosure Date: 12/18/2019

Viol. Classification: Moderate

Citation: 30 TAC Chapter 101, SubChapter A 101.20(2)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT A 63.10(b)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT G 63.151(j)

Description: Failed to report and maintain documentation for updated Hazardous Organic NESHAP (HON) applicability for F4, F6, and F5 operating units.

Viol. Classification: Moderate

Citation: 30 TAC Chapter 101, SubChapter A 101.20(2)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT F 63.100
40 CFR Chapter 63, SubChapter C, PT 63, SubPT G 63.151(j)

Description: Failed to update the Notification of Compliance Status to reflect revised applicability for F4, F6, and F5 operating units.

Viol. Classification: Moderate

Citation: 30 TAC Chapter 101, SubChapter A 101.20(2)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT A 63.10(b)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT G 63.151(j)

Description: Failed to report and maintain detailed applicability documentation for group status determinations of the F8 operating unit.

Viol. Classification: Moderate

Citation: 30 TAC Chapter 101, SubChapter A 101.20(2)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT G 63.152(b)

Description: Failed to update and submit Notice of Compliance Status documentation for the F8 operating unit.

Viol. Classification: Moderate

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

- 40 CFR Chapter 63, SubChapter C, PT 63, SubPT G 63.115
- 40 CFR Chapter 63, SubChapter C, PT 63, SubPT G 63.115(a)
- 40 CFR Chapter 63, SubChapter C, PT 63, SubPT G 63.115(b)
- 40 CFR Chapter 63, SubChapter C, PT 63, SubPT G 63.115(c)
- 40 CFR Chapter 63, SubChapter C, PT 63, SubPT G 63.115(d)
- 40 CFR Chapter 63, SubChapter C, PT 63, SubPT G 63.115(e)
- 40 CFR Chapter 63, SubChapter C, PT 63, SubPT G 63.115(f)

Description: Failed to maintain consistent documentation for the CO2 Vents associated with F4, F6, and F8 operating units and which adequately demonstrates Group 2 status as required.

Viol. Classification: Moderate
 Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
 Rqmt Prov: PERMIT General Condition 1
 PERMIT General Requirements 1

Description: Failed to provide accurate permit representations. Specifically, permitted maximum emissions rates for CO2 vents and wastewater fugitives are higher than actual emissions and do not align with existing Hazardous Organic NESHAP applicability determinations.

Viol. Classification: Moderate
 Citation: 30 TAC Chapter 101, SubChapter A 101.20(2)
 40 CFR Chapter 63, SubChapter C, PT 63, SubPT G 63.132(a)(1)
 40 CFR Chapter 63, SubChapter C, PT 63, SubPT G 63.132(c)
 40 CFR Chapter 63, SubChapter C, PT 63, SubPT G 63.144(b)
 40 CFR Chapter 63, SubChapter C, PT 63, SubPT G 63.144(c)

Description: Failed to maintain detailed applicability documentation for several Hazardous Organic NESHAP wastewater Points of Determination.

Viol. Classification: Moderate
 Citation: 30 TAC Chapter 101, SubChapter A 101.20(2)

40 CFR Part 63, Subpart G 63.132(a)(2)(i)

Description: Failed to identify all Hazardous Organic NESHAP waste management units managing HON Group 1 Wastewater Streams.

Viol. Classification: Moderate
 Citation: 30 TAC Chapter 101, SubChapter A 101.20(2)
 40 CFR Chapter 63, SubChapter C, PT 63, SubPT G 63.143(a)

Description: Failed to update documentation for Table 11 semiannual inspections for HON waste management units.

Viol. Classification: Moderate
 Citation: 30 TAC Chapter 101, SubChapter A 101.20(2)
 40 CFR Chapter 63, SubChapter C, PT 63, SubPT G 63.148(i)

Description: Failed to update documentation for annual visual inspections for HON closed vent systems.

Viol. Classification: Moderate
 Citation: 30 TAC Chapter 101, SubChapter A 101.20(2)
 40 CFR Chapter 63, SubChapter C, PT 63, SubPT G 63.110(d)

Description: Failed to prevent an incorrect application of overlap for process vents between 40 CFR Part 60, NSPS NNN/RRR and 40 CFR Part 63, Subparts F and G.

G. Type of environmental management systems (EMSs):

N/A

H. Voluntary on-site compliance assessment dates:

N/A

I. Participation in a voluntary pollution reduction program:

N/A

J. Early compliance:

N/A

Sites Outside of Texas:

N/A



Compliance History Report

Compliance History Report for CN603624289, RN100219252, Rating Year 2022 which includes Compliance History (CH) components from September 1, 2017, through August 31, 2022.

Customer, Respondent, or Owner/Operator: CN603624289, TPC Group LLC

Classification: SATISFACTORY

Rating: 8.46

Regulated Entity: RN100219252, PORT NECHES OPERATIONS

Classification: SATISFACTORY

Rating: 3.08

Complexity Points: 47

Repeat Violator: NO

CH Group: 05 - Chemical Manufacturing

Location: 2701 Spur 136 in Port Neches, Jefferson County, Texas

TCEQ Region: REGION 10 - BEAUMONT

ID Number(s):

AIR OPERATING PERMITS ACCOUNT NUMBER JE0052V

AIR OPERATING PERMITS PERMIT 2286

AIR OPERATING PERMITS PERMIT 2288

AIR NEW SOURCE PERMITS AFS NUM 4824500006

AIR NEW SOURCE PERMITS REGISTRATION 51736

AIR NEW SOURCE PERMITS REGISTRATION 54551

AIR NEW SOURCE PERMITS REGISTRATION 44034

AIR NEW SOURCE PERMITS REGISTRATION 45090

AIR NEW SOURCE PERMITS REGISTRATION 45277

AIR NEW SOURCE PERMITS REGISTRATION 47065

AIR NEW SOURCE PERMITS REGISTRATION 47555

AIR NEW SOURCE PERMITS REGISTRATION 47887

AIR NEW SOURCE PERMITS REGISTRATION 48176

AIR NEW SOURCE PERMITS REGISTRATION 49493

AIR NEW SOURCE PERMITS PERMIT 647B

AIR NEW SOURCE PERMITS PERMIT 5952A

AIR NEW SOURCE PERMITS REGISTRATION 7761

AIR NEW SOURCE PERMITS PERMIT 19823

AIR NEW SOURCE PERMITS PERMIT 20160

AIR NEW SOURCE PERMITS REGISTRATION 31443

AIR NEW SOURCE PERMITS REGISTRATION 36453

AIR NEW SOURCE PERMITS REGISTRATION 40103

AIR NEW SOURCE PERMITS REGISTRATION 41444

AIR NEW SOURCE PERMITS REGISTRATION 41757

AIR NEW SOURCE PERMITS REGISTRATION 42153

AIR NEW SOURCE PERMITS REGISTRATION 75597

AIR NEW SOURCE PERMITS REGISTRATION 75748

AIR NEW SOURCE PERMITS REGISTRATION 55753

AIR NEW SOURCE PERMITS PERMIT 56390

AIR NEW SOURCE PERMITS REGISTRATION 70571

AIR NEW SOURCE PERMITS REGISTRATION 70726

AIR NEW SOURCE PERMITS REGISTRATION 56073

AIR NEW SOURCE PERMITS REGISTRATION 54219

AIR NEW SOURCE PERMITS REGISTRATION 72310

AIR NEW SOURCE PERMITS REGISTRATION 54570

AIR NEW SOURCE PERMITS REGISTRATION 71751

AIR NEW SOURCE PERMITS REGISTRATION 50360

AIR NEW SOURCE PERMITS REGISTRATION 72907

AIR NEW SOURCE PERMITS REGISTRATION 75203

AIR NEW SOURCE PERMITS REGISTRATION 76732

AIR NEW SOURCE PERMITS REGISTRATION 78974

AIR OPERATING PERMITS PERMIT 1320

AIR OPERATING PERMITS PERMIT 2287

AIR OPERATING PERMITS PERMIT 3056

AIR NEW SOURCE PERMITS PERMIT 29516

AIR NEW SOURCE PERMITS REGISTRATION 52715

AIR NEW SOURCE PERMITS REGISTRATION 54565

AIR NEW SOURCE PERMITS REGISTRATION 44434

AIR NEW SOURCE PERMITS REGISTRATION 45094

AIR NEW SOURCE PERMITS REGISTRATION 46791

AIR NEW SOURCE PERMITS REGISTRATION 47066

AIR NEW SOURCE PERMITS REGISTRATION 47577

AIR NEW SOURCE PERMITS REGISTRATION 48178

AIR NEW SOURCE PERMITS PERMIT 49247

AIR NEW SOURCE PERMITS ACCOUNT NUMBER JE0052V

AIR NEW SOURCE PERMITS PERMIT 5807A

AIR NEW SOURCE PERMITS PERMIT 5972A

AIR NEW SOURCE PERMITS PERMIT 16909

AIR NEW SOURCE PERMITS PERMIT 20134

AIR NEW SOURCE PERMITS REGISTRATION 23568

AIR NEW SOURCE PERMITS PERMIT 36646

AIR NEW SOURCE PERMITS REGISTRATION 39725

AIR NEW SOURCE PERMITS REGISTRATION 40527

AIR NEW SOURCE PERMITS REGISTRATION 41301

AIR NEW SOURCE PERMITS REGISTRATION 42103

AIR NEW SOURCE PERMITS REGISTRATION 42154

AIR NEW SOURCE PERMITS REGISTRATION 76018

AIR NEW SOURCE PERMITS PERMIT 83816

AIR NEW SOURCE PERMITS REGISTRATION 70024

AIR NEW SOURCE PERMITS REGISTRATION 56243

AIR NEW SOURCE PERMITS REGISTRATION 70781

AIR NEW SOURCE PERMITS REGISTRATION 53551

AIR NEW SOURCE PERMITS REGISTRATION 70011

AIR NEW SOURCE PERMITS REGISTRATION 53979

AIR NEW SOURCE PERMITS REGISTRATION 54231

AIR NEW SOURCE PERMITS REGISTRATION 54234

AIR NEW SOURCE PERMITS REGISTRATION 52077

AIR NEW SOURCE PERMITS REGISTRATION 73663

AIR NEW SOURCE PERMITS REGISTRATION 74296

AIR NEW SOURCE PERMITS REGISTRATION 75202

AIR NEW SOURCE PERMITS REGISTRATION 77129

AIR NEW SOURCE PERMITS REGISTRATION 79529

AIR NEW SOURCE PERMITS REGISTRATION 80149
AIR NEW SOURCE PERMITS REGISTRATION 81531
AIR NEW SOURCE PERMITS REGISTRATION 82922
AIR NEW SOURCE PERMITS EPA PERMIT PSDTX780
AIR NEW SOURCE PERMITS REGISTRATION 139463
AIR NEW SOURCE PERMITS REGISTRATION 110757
AIR NEW SOURCE PERMITS REGISTRATION 110787
AIR NEW SOURCE PERMITS REGISTRATION 110808
AIR NEW SOURCE PERMITS REGISTRATION 150790
AIR NEW SOURCE PERMITS REGISTRATION 153791
AIR NEW SOURCE PERMITS REGISTRATION 152840
AIR NEW SOURCE PERMITS REGISTRATION 154036
AIR NEW SOURCE PERMITS REGISTRATION 164694
AIR NEW SOURCE PERMITS REGISTRATION 168479
AIR NEW SOURCE PERMITS REGISTRATION 169413
AIR NEW SOURCE PERMITS REGISTRATION 164877
AIR NEW SOURCE PERMITS REGISTRATION 167574
AIR NEW SOURCE PERMITS REGISTRATION 170963
AIR NEW SOURCE PERMITS REGISTRATION 163874
AIR NEW SOURCE PERMITS REGISTRATION 142196
AIR NEW SOURCE PERMITS REGISTRATION 148227
AIR NEW SOURCE PERMITS REGISTRATION 150168
AIR NEW SOURCE PERMITS REGISTRATION 156133
AIR NEW SOURCE PERMITS REGISTRATION 155871
AIR NEW SOURCE PERMITS REGISTRATION 160459
AIR NEW SOURCE PERMITS REGISTRATION 155472
AIR NEW SOURCE PERMITS REGISTRATION 161628
AIR NEW SOURCE PERMITS REGISTRATION 152402
AIR NEW SOURCE PERMITS REGISTRATION 155384
AIR NEW SOURCE PERMITS REGISTRATION 155634
PETROLEUM STORAGE TANK REGISTRATION
REGISTRATION 40711
IHW CORRECTIVE ACTION SOLID WASTE REGISTRATION
(SWR) 30029
WASTEWATER EPA ID TX0005070
POLLUTION PREVENTION PLANNING ID NUMBER
P00679
INDUSTRIAL AND HAZARDOUS WASTE PERMIT 50363

INDUSTRIAL AND HAZARDOUS WASTE EPA ID
TXD008076846
TAX RELIEF ID NUMBER 17954
TAX RELIEF ID NUMBER 17984
TAX RELIEF ID NUMBER 17095
TAX RELIEF ID NUMBER 17093
TAX RELIEF ID NUMBER 17940
TAX RELIEF ID NUMBER 17977
TAX RELIEF ID NUMBER 18835
TAX RELIEF ID NUMBER 17985
TAX RELIEF ID NUMBER 24379

AIR NEW SOURCE PERMITS REGISTRATION 80702
AIR NEW SOURCE PERMITS REGISTRATION 81415
AIR NEW SOURCE PERMITS REGISTRATION 92256
AIR NEW SOURCE PERMITS REGISTRATION 91994
AIR NEW SOURCE PERMITS PERMIT 106169
AIR NEW SOURCE PERMITS REGISTRATION 109215
AIR NEW SOURCE PERMITS REGISTRATION 110809
AIR NEW SOURCE PERMITS REGISTRATION 110813
AIR NEW SOURCE PERMITS REGISTRATION 150484
AIR NEW SOURCE PERMITS REGISTRATION 150307
AIR NEW SOURCE PERMITS REGISTRATION 152982
AIR NEW SOURCE PERMITS REGISTRATION 163020
AIR NEW SOURCE PERMITS REGISTRATION 169507
AIR NEW SOURCE PERMITS REGISTRATION 164604
AIR NEW SOURCE PERMITS REGISTRATION 166541
AIR NEW SOURCE PERMITS REGISTRATION 167060
AIR NEW SOURCE PERMITS REGISTRATION 170571
AIR NEW SOURCE PERMITS REGISTRATION 169228
AIR NEW SOURCE PERMITS REGISTRATION 166117
AIR NEW SOURCE PERMITS REGISTRATION 151107
AIR NEW SOURCE PERMITS REGISTRATION 143027
AIR NEW SOURCE PERMITS REGISTRATION 150992
AIR NEW SOURCE PERMITS PERMIT 79802
AIR NEW SOURCE PERMITS REGISTRATION 160594
AIR NEW SOURCE PERMITS REGISTRATION 159322
AIR NEW SOURCE PERMITS REGISTRATION 161151
AIR NEW SOURCE PERMITS REGISTRATION 157572
AIR NEW SOURCE PERMITS REGISTRATION 160045
AIR NEW SOURCE PERMITS REGISTRATION 160606
AIR NEW SOURCE PERMITS REGISTRATION 171239
PETROLEUM STORAGE TANK REGISTRATION
REGISTRATION 79935
WASTEWATER PERMIT WQ0000511000

AIR EMISSIONS INVENTORY ACCOUNT NUMBER JE0052V
INDUSTRIAL AND HAZARDOUS WASTE PERMIT 50055

INDUSTRIAL AND HAZARDOUS WASTE EPA ID
TX0000201202
INDUSTRIAL AND HAZARDOUS WASTE SOLID WASTE
REGISTRATION # (SWR) 30029
TAX RELIEF ID NUMBER 17974
TAX RELIEF ID NUMBER 17986
TAX RELIEF ID NUMBER 17100
TAX RELIEF ID NUMBER 17975
TAX RELIEF ID NUMBER 17983
TAX RELIEF ID NUMBER 18840
TAX RELIEF ID NUMBER 17970
TAX RELIEF ID NUMBER 17088

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

Date Compliance History Report Prepared: January 10, 2023

Agency Decision Requiring Compliance History: Enforcement

Component Period Selected: January 10, 2018 to January 10, 2023

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

Name: Harley Hobson

Phone: (512) 239-1337

Site and Owner/Operator History:

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

YES

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

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

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

- 1 Effective Date: 05/04/2018 ADMINORDER 2016-1709-IWD-E (1660 Order-Agreed Order With Denial)
Classification: Major
Citation: 2D TWC Chapter 26, SubChapter A 26.121(a)(1)
30 TAC Chapter 305, SubChapter F 305.125(1)
Rqmt Prov: Effluent Limits PERMIT
Description: Failed to comply with permitted effluent limitations, in violation of TEX. WATER CODE § 26.121(a)(1), 30 TEX. ADMIN. CODE § 305.125(1), and Texas Pollutant Discharge Elimination System ("TPDES") Permit No. WQ0000511000, Effluent Limitations and Monitoring Requirements No. 1, Outfall Nos. 001, 003 and 301 and Effluent Limitations and Monitoring Requirements No. 2, Outfall No. 009

- 2 Effective Date: 10/08/2018 ADMINORDER 2017-1219-AIR-E (1660 Order-Agreed Order With Denial)
Classification: Moderate
Citation: 30 TAC Chapter 116, SubChapter B 116.115(b)(2)(F)
30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)
5C THSC Chapter 382 382.085(b)
Rqmt Prov: General Terms and Conditions OP
Special Condition 1 PERMIT
Special Condition 14 OP
Description: Failure to prevent unauthorized emissions to the atmosphere during an emissions event that occurred on September 23, 2016, TCEQ/STEERS Incident No. 244445.
Classification: Moderate
Citation: 30 TAC Chapter 116, SubChapter B 116.115(b)(2)(F)
30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)
5C THSC Chapter 382 382.085(b)
Rqmt Prov: General Terms and Conditions OP
Special Condition 1 PERMIT
Special Condition 19 OP
Description: Failure to prevent unauthorized emissions to the atmosphere during an emissions event that occurred on October 20, 2016, TCEQ/STEERS Incident No. 245872.
Classification: Moderate
Citation: 30 TAC Chapter 116, SubChapter B 116.115(b)(2)(F)
30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)
5C THSC Chapter 382 382.085(b)
Rqmt Prov: General Terms and Conditions OP
Special Condition 1 PERMIT
Special Condition 17 OP
Description: Failure to prevent unauthorized emissions to the atmosphere during an emissions event that occurred on March 17, 2017, TCEQ Incident 254371.

- 3 Effective Date: 10/27/2020 ADMINORDER 2016-1906-AIR-E (1660 Order-Agreed Order With Denial)
Classification: Moderate
Citation: 30 TAC Chapter 116, SubChapter B 116.115(b)(2)(F)
30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)
Rqmt Prov: General Terms and Conditions OP
Special Condition 1 PERMIT
Special Condition 14 OP
Special Condition 17 OP
Special Condition 19 OP
Description: Failed to prevent unauthorized emissions. Specifically, the Respondent released 175.47 pounds ("lbs") of volatile organic compounds ("VOC") from the F6 Reabsorber Vent during an emissions event (Incident No. 222751) that began on November 7, 2015 and lasted 24 hours.
Classification: Moderate

Citation: 30 TAC Chapter 101, SubChapter F 101.201(b)(1)(H)
30 TAC Chapter 122, SubChapter B 122.143(4)

Rqmt Prov: General Terms and Conditions OP
Special Condition 2F OP

Description: Failure to provide the estimated total quantities of all compounds or mixtures of air contaminants released during an emissions event in the final records (TCEQ/STEERS Incident No. 222751).

Classification: Moderate

Citation: 30 TAC Chapter 116, SubChapter B 116.115(b)(2)(F)
30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)

Rqmt Prov: General Terms and Conditions OP
Special Condition 1 PERMIT
Special Condition 14 OP

Description: Failed to prevent unauthorized emissions. Specifically, the Respondent released 366 lbs of VOC from the F6 Reabsorber Vent during an emissions event (Incident No. 227974) that began on February 18, 2016 and lasted for 16 minutes.

Classification: Moderate

Citation: 30 TAC Chapter 116, SubChapter B 116.115(b)(2)(F)
30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)

Rqmt Prov: General Terms and Conditions OP
Special Condition 1 PERMIT
Special Condition 14 OP

Description: Failed to prevent unauthorized emissions. Specifically, the Respondent released 12,150.14 lbs of VOC from the F6 Reabsorber Vent during an emissions event (Incident No. 230209) that began on March 28, 2016 and lasted for 18 hours.

Classification: Moderate

Citation: 30 TAC Chapter 116, SubChapter B 116.115(b)(2)(F)
30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)

Rqmt Prov: General Terms and Conditions OP
Special Condition 1 PERMIT
Special Condition 17 OP
Special Condition 19 OP

Description: Failed to prevent unauthorized emissions. Specifically, the Respondent released 2,966 lbs of VOC, 2,149 lbs of CO, and 297 lbs of NOx from the PO Ground Flare, EPN POFLARE, 1,357 lbs of VOC, 2,936 lbs of CO, and 368 lbs of NOx from Flare No. 3, EPN UER037, and 607 lbs of CO, and 39 lbs of NOx collectively from Flare No. 1, EPN UER044, and Flare No. 2, EPN UER046, during an emissions event (Incident No. 239362) that began on July 19, 2016 and lasted for 48 hours.

Classification: Moderate

Citation: 30 TAC Chapter 116, SubChapter B 116.115(b)(2)(F)
30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)

Rqmt Prov: General Terms and Conditions OP
Special Condition 1 PERMIT
Special Condition 19 OP

Description: Failed to prevent unauthorized emissions. Specifically, the Respondent released 148.98 lbs of NOx and 301.63 lbs of CO from Flare Nos. 1 and 2, EPNs UER046 and UER044, respectively, and 1,580.26 lbs of VOC, 405.83 lbs of NOx, and 3,237 lbs of CO from Flare No. 3, EPN UER037, during an emissions event (Incident No. 242417) that began on August 28, 2016 and lasted for 14 hours and 39 minutes.

Classification: Moderate

Citation: 30 TAC Chapter 116, SubChapter B 116.115(b)(2)(F)
30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)

Rqmt Prov: General Terms and Conditions OP
Special Condition 1 PERMIT
Special Condition 13 PERMIT
Special Condition 19 OP

Description: Failed to prevent unauthorized emissions. Specifically, the Respondent released 5,416 lbs of VOC from the F-A3-103 DeMethanizer Pressure Relief Valve ("PRV") during an emissions event (Incident No. 242427) that began on August 28, 2016 and lasted eight minutes.

Classification: Moderate

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

30 TAC Chapter 122, SubChapter B 122.143(4)

Rqmt Prov: General Terms and Conditions OP

Special Condition 1 PERMIT

Special Condition 14 OP

Description: Failed to prevent unauthorized emissions. Specifically, the Respondent released 22,191 lbs of VOC from the F8 Ethylene Oxide Unit during emissions events (Incident Nos. 233310, 233312, and 233329) that occurred on May 15, 2016 and lasted one hour and 47 minutes and occurred on May 16, 2016 and lasted one hour and 27 minutes.

Classification: Moderate

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

Rqmt Prov: General Terms and Conditions OP

Special Condition 19 OP

Special Condition 28B PERMIT

Description: Failure to maintain the average annual flow rate for the North and Center Flares below permitted limits.

4 Effective Date: 11/28/2022 ADMINORDER 2020-1274-AIR-E (1660 Order-Agreed Order With Denial)

Classification: Moderate

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

30 TAC Chapter 122, SubChapter B 122.143(4)

5C THSC Chapter 382 382.085(b)

Rqmt Prov: NSR 20160 Special Condition 1 PERMIT

O3056 General Terms and Conditions OP

O3056 Special Condition 17 OP

Description: Failure to prevent unauthorized emissions. The Respondent released 13,459 pounds ("lbs") of volatile organic compounds ("VOC") and 41 lbs of acetone as fugitive emissions, during an emissions event (Incident No. 335200) that occurred on May 7, 2020 and lasted 15 minutes. The emissions event occurred due to an open bleeder valve in the TBA flush system and excessive vibration from excessive and cyclic flow through the TBA flush line that caused the plug on the bleeder valve to come off.

Classification: Moderate

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

30 TAC Chapter 122, SubChapter B 122.143(4)

5C THSC Chapter 382 382.085(b)

Rqmt Prov: FOP O13056 Special Condition 17 OP

FOP O3056 General Terms and Conditions OP

NSR 20160 Special Condition 1 PERMIT

Description: Failure to prevent unauthorized emissions. The Respondent released 3,759.78 lbs of VOC, 380.36 lbs of NOx, 35 lbs of acetone, and 2,771.66 lbs of CO from the Propylene Oxide ("PO") Ground Flare, EPN POFLARE, during an emissions event (Incident No. 335589) that began on May 16, 2020 and lasted 26 hours and two minutes. The emissions event occurred due to fouling in the float chamber of Level Controller Transmitter LT-2752 to fail and Compressor C-005 to safely shut down, resulting in flaring.

Classification: Moderate

Citation: 30 TAC Chapter 101, SubChapter F 101.201(b)(1)(F)

30 TAC Chapter 122, SubChapter B 122.143(4)

5C THSC Chapter 382 382.085(b)

Rqmt Prov: FOP O3056 General Terms and Conditions OP

FOP O3056 Special Condition 2F OP

Description: Failure to identify all required information on the final record for a reportable emissions event. The Respondent reported a duration of 37 hours and two minutes on the final record for Incident No. 335589, but after further review and investigation, the Respondent determined that the full duration of the emissions event was 26 hours and 2 mins.

Classification: Moderate

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

30 TAC Chapter 122, SubChapter B 122.143(4)

5C THSC Chapter 382 382.085(b)

Rqmt Prov: FOP O1320 General Terms and Conditions OP

FOP O1320 Special Condition 15 OP

FOP O3056 General Terms and Conditions OP

FOP O3056 Special Condition 17 OP

NSR 106169 Special Condition 1 PERMIT

NSR 20160 Special Condition 1 PERMIT

NSR 5952A Special Condition 1 PERMIT

NSR 5972A Special Condition 1 PERMIT

Description: Failure to prevent unauthorized emissions. The Respondent released 289.72 lbs of VOC, 70.66 lbs of NOx, 516.89 lbs of CO, and 17.72 lbs of acetone from the PO Ground Flare, EPN POFLARE, and 17,253.34 lbs of VOC as fugitive emissions from the F4 Unit (3,702.85 lbs), the F6 Unit (7,109.53 lbs), and the F8 Unit (6,440.96 lbs), during an emissions

event (Incident No. 343692) that began on October 9, 2020 and lasted eight hours. The emissions event occurred due to an area-wide power interruption

See addendum for information regarding federal actions.

B. Criminal convictions:

N/A

C. Chronic excessive emissions events:

N/A

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

Item 1	February 12, 2018	(1465800)	Item 32	March 25, 2020	(1647163)
Item 2	May 01, 2018	(1482263)	Item 33	April 03, 2020	(1632892)
Item 3	June 14, 2018	(1474203)	Item 34	April 10, 2020	(1632873)
Item 4	June 25, 2018	(1498328)	Item 35	May 08, 2020	(1646490)
Item 5	July 02, 2018	(1499106)	Item 36	June 22, 2020	(1666590)
Item 6	August 06, 2018	(1497881)	Item 38	August 14, 2020	(1664481)
Item 7	August 14, 2018	(1500326)	Item 39	August 18, 2020	(1666259)
Item 8	August 20, 2018	(1474362)	Item 40	October 14, 2020	(1666267)
Item 9	August 21, 2018	(1507534)	Item 41	October 27, 2020	(1684137)
Item 10	September 24, 2018	(1527233)	Item 42	January 15, 2021	(1690222)
Item 11	November 05, 2018	(1525865)	Item 43	May 30, 2021	(1705313)
Item 12	November 15, 2018	(1526096)	Item 44	June 03, 2021	(1705331)
Item 13	November 19, 2018	(1541426)	Item 45	June 04, 2021	(1706401)
Item 14	December 18, 2018	(1545210)	Item 46	June 08, 2021	(1706652)
Item 15	December 27, 2018	(1537332)	Item 47	June 09, 2021	(1706708)
Item 16	January 22, 2019	(1539063)	Item 48	June 25, 2021	(1735131)
Item 17	February 22, 2019	(1540687)	Item 49	November 08, 2021	(1765078)
Item 18	February 26, 2019	(1550024)	Item 50	November 16, 2021	(1762383)
Item 19	March 19, 2019	(1559604)	Item 51	November 22, 2021	(1783603)
Item 20	April 08, 2019	(1554750)	Item 52	December 07, 2021	(1764498)
Item 21	April 25, 2019	(1571807)	Item 53	December 24, 2021	(1790627)
Item 22	May 08, 2019	(1555583)	Item 54	January 20, 2022	(1798422)
Item 23	May 15, 2019	(1552240)	Item 55	February 17, 2022	(1782346)
Item 24	June 25, 2019	(1576172)	Item 56	March 14, 2022	(1782372)
Item 25	June 26, 2019	(1583224)	Item 58	May 20, 2022	(1817383)
Item 26	October 22, 2019	(1603077)	Item 59	October 20, 2022	(1804094)
Item 27	November 13, 2019	(1605757)	Item 60	November 04, 2022	(1853646)
Item 28	November 18, 2019	(1605647)	Item 62	November 18, 2022	(1859919)
Item 29	November 20, 2019	(1619031)	Item 63	December 16, 2022	(1866706)
Item 30	January 24, 2020	(1634024)	Item 64	December 20, 2022	(1866347)
Item 31	February 25, 2020	(1640643)	Item 65	January 02, 2023	(1867211)

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: 01/31/2022 (1806297)
 Self Report? YES Classification: Moderate
 Citation: 2D TWC Chapter 26, SubChapter A 26.121(a)
 30 TAC Chapter 305, SubChapter F 305.125(1)
 Description: Failure to meet the limit for one or more permit parameter

- 2 Date: 02/28/2022 (1813362)
 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

- 3 Date: 02/28/2022 (1774849)
 Self Report? NO Classification: Moderate
 Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
 30 TAC Chapter 122, SubChapter B 122.143(4)
 5C THSC Chapter 382 382.085(b)
 FOP O2286 General Terms and Conditions OP

Description: Failure to comply with permit conditions regarding the use of compounds. EIC
B18(g)(1) Mod 2D

- 4 Date: 03/31/2022 (1819934)
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: 04/01/2022 (1796299)
Self Report? NO Classification: Minor
Citation: DSPC, Pg. 3, No. 2(a) PERMIT
Description: Failure by Indorama Ventures Propylene Oxides, LLC - Port Neches Operation
(Indorama) to calibrate the flow meter at least annually to ensure accuracy.
Self Report? NO Classification: Minor
Citation: OpR, Pg. 11, No. 1 PERMIT
Description: Failure by Indorama Ventures Propylene Oxides, LLC - Port Neches Operation
(Indorama) to properly operate and maintain all systems of collection, treatment,
and disposal.
Self Report? NO Classification: Minor
Citation: OpR, Pg. 11, No. 1 PERMIT
Description: Failure by Indorama Ventures Propylene Oxides, LLC - Port Neches Operation
(Indorama) to properly operate and maintain all systems of collection, treatment,
and disposal.
Self Report? NO Classification: Minor
Citation: OpR, Pg. 11, No. 1 PERMIT
Description: Failure by Indorama Ventures Propylene Oxides, LLC - Port Neches Operation
(Indorama) to properly operate and maintain all systems of collection, treatment,
and disposal.
Self Report? NO Classification: Minor
Citation: MRR 7(c) PERMIT
Description: Failure by Indorama Ventures Oxides to report any effluent violation that deviates
from the permitted effluent limitation by more than 40% in writing to the
Regional Office and the Enforcement Division (MC 224) within 5 working days of
becoming aware of the noncompliance.
Self Report? NO Classification: Minor
Citation: MRR 3(c)(i) PERMIT
Description: Failure by Indorama Ventures Oxides (Indorama) to maintain records of
monitoring activities.
Self Report? NO Classification: Minor
Citation: MRR 3(c)(iii) PERMIT
Description: Failure by Indorama Ventures Oxides (Indorama) to maintain records of
monitoring activities.
Self Report? NO Classification: Minor
Citation: MRR 2(a) PERMIT
Description: Failure by Indorama Ventures Oxides to comply with test procedures specified in
30 TAC 319.11 - 319.12.
Self Report? NO Classification: Minor
Citation: MRR 2(a) PERMIT
Description: Failure by Indorama Ventures Oxides to comply with test procedures specified in
30 TAC 319.11 - 319.12.
Self Report? NO Classification: Minor
Citation: MRR 3(c)(vi) PERMIT
Description: Failure by Indorama Ventures Oxides to maintain records of monitoring activities.
Self Report? NO Classification: Minor
Citation: MRR 3(a) PERMIT
Description: Failure by Indorama Ventures Oxides to obtain measurements at times and in a
manner so as to be representative of the monitored activity.
Self Report? NO Classification: Minor
Citation: MRR 3(c)(vi) PERMIT
Description: Failure by Indorama Ventures Oxides to maintain records of monitoring activities.
Self Report? NO Classification: Minor
Citation: MRR 2(a) PERMIT
Description: Failure by Indorama Ventures Oxides to comply with test procedures 30 TAC
319.11 - 319.12.
Self Report? NO Classification: Moderate
Citation: ELMR 3 PERMIT
PC 2(d) PERMIT

Description: Failure by Indorama Ventures Oxides to take all reasonable steps to prevent a discharge that had a reasonable likelihood of adversely affecting human health or the environment which resulted in the discharge of visible oil.
 Self Report? NO Classification: Minor
 Citation: OpR 11(f) PERMIT

Description: Failure by Indorama Ventures Oxides to make records readily available for review by authorized representatives of the TCEQ.
 Self Report? NO Classification: Minor
 Citation: OpR 1 PERMIT

Description: Failure by Indorama Ventures Oxides to properly operate and maintain units of collection, treatment, and disposal.
 Self Report? NO Classification: Minor
 Citation: MRR 3(c)(i) PERMIT

Description: Failure by Indorama Ventures Oxides to maintain records of monitoring activities.
 Self Report? NO Classification: Moderate
 Citation: ELMR 1 PERMIT

Description: Failure by Indorama Ventures Oxides to discharge compliant effluent for oil and grease through Outfall 008.
 Self Report? NO Classification: Moderate
 Citation: ELMR 1 PERMIT

Description: Failure by Indorama Ventures Oxides to discharge compliant effluent for chemical oxygen demand at Outfall 301.
 Self Report? NO Classification: Moderate
 Citation: OT 2 PERMIT

Description: Failure by Indorama Ventures Oxides to report orally or by facsimile within 24 hours of becoming aware of the violation and a written report within five working days to the TCEQ Region 10 and the Enforcement Division (MC 224) when exceeding the daily maximum limitation of zinc.
 Self Report? NO Classification: Minor
 Citation: MRR 3(c)(v) PERMIT

Description: Failure Indorama Ventures Oxides to maintain records of monitoring activities.

6 Date: 04/30/2022 (1828774)
 Self Report? YES Classification: Moderate
 Citation: 2D TWC Chapter 26, SubChapter A 26.121(a)
 30 TAC Chapter 305, SubChapter F 305.125(1)
 Description: Failure to meet the limit for one or more permit parameter

7 Date: 05/31/2022 (1835064)
 Self Report? YES Classification: Moderate
 Citation: 2D TWC Chapter 26, SubChapter A 26.121(a)
 30 TAC Chapter 305, SubChapter F 305.125(1)
 Description: Failure to meet the limit for one or more permit parameter

8 Date: 06/30/2022 (1842270)
 Self Report? YES Classification: Moderate
 Citation: 2D TWC Chapter 26, SubChapter A 26.121(a)
 30 TAC Chapter 305, SubChapter F 305.125(1)
 Description: Failure to meet the limit for one or more permit parameter

9 Date: 07/31/2022 (1848404)
 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

10 Date: 08/10/2022 (1832699)
 Self Report? NO Classification: Moderate
 Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
 30 TAC Chapter 122, SubChapter B 122.143(4)
 5C THSC Chapter 382 382.085(b)
 FOP O2288 GTC OP
 FOP O2288 SC 19 OP
 NSR 19823 SC 25F PERMIT
 Description: Failure to maintain wastewater carbon bed Volatile Organic Compounds (VOC) concentrations below permitted limits. EIC B18(g)(1) Mod 2D
 Self Report? NO Classification: Moderate
 Citation: 30 TAC Chapter 101, SubChapter A 101.20(3)
 30 TAC Chapter 116, SubChapter B 116.115(c)

30 TAC Chapter 122, SubChapter B 122.143(4)
 5C THSC Chapter 382 382.085(b)
 FOP O2288 GTC OP
 FOP O2288 SC 19 OP
 NSR 16909 & PSDTX780 SC 1 PERMIT
 NSR 16909 & PSDTX780 SC 4 PERMIT
 Description: Failure to comply with permitted emissions rates for the Cogen Unit 1, EPN CG1.
 EIC B18(g)(1) Mod 2D
 Self Report? NO Classification: Moderate
 Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
 30 TAC Chapter 122, SubChapter B 122.143(4)
 5C THSC Chapter 382 382.085(b)
 FOP O2288 GTC OP
 FOP O2288 SC 19 OP
 NSR 19823 SC 19B PERMIT
 Description: Failure to maintain Cooling Tower EPN CT-4 Total Dissolved Solids (TDS) below
 permitted limits. EIC B18(g)(1) Mod 2D
 Self Report? NO Classification: Moderate
 Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
 30 TAC Chapter 122, SubChapter B 122.143(4)
 5C THSC Chapter 382 382.085(b)
 FOP O2288 GTC OP
 FOP O2288 SC 19 OP
 NSR 19823 SC 10F PERMIT
 Description: Failure to maintain flare heat inputs below the maximum combined limit for the
 North/Center Flares, EPNs UER044 and UER046, as required. EIC B18(g)(1)
 Mod 2D
 Self Report? NO Classification: Moderate
 Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
 30 TAC Chapter 122, SubChapter B 122.143(4)
 5C THSC Chapter 382 382.085(b)
 FOP O2288 GTC OP
 FOP O2288 SC 19 OP
 NSR 19823 SC 10F PERMIT
 Description: Failure to maintain flare heat inputs below the maximum limit for the South Flare,
 EPN UER037, as required. EIC B18(g)(1) Mod 2D
 Self Report? NO Classification: Moderate
 Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
 30 TAC Chapter 122, SubChapter B 122.143(4)
 5C THSC Chapter 382 382.085(b)
 FOP O2288 GTC OP
 FOP O2288 SC 19 OP
 NSR 19823 SC 1 PERMIT
 NSR 19823 SC 13A PERMIT
 NSR 19823 SC 8 PERMIT
 Description: Failure to comply with permitted emissions rates for the Waste Heat Boiler, EPN
 A3HA35. EIC B18(g)(1) Mod 2D
 Self Report? NO Classification: Moderate
 Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
 30 TAC Chapter 122, SubChapter B 122.143(4)
 5C THSC Chapter 382 382.085(b)
 FOP O2288 GTC OP
 FOP O2288 SC 19 OP
 NSR 49247 SC 3 PERMIT
 Description: Failure to maintain the minimum concentration in the aeration basins as required.
 EIC B18(g)(1) Mod 2D
 Self Report? NO Classification: Moderate
 Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
 30 TAC Chapter 122, SubChapter B 122.143(4)
 40 CFR Chapter 60, SubChapter C, PT 60, SubPT A 60.18(c)(3)(ii)
 5C THSC Chapter 382 382.085(b)
 FOP O2288 GTC OP
 FOP O2288 SC 19 OP
 FOP O2288 SC 1A OP
 NSR 19823 SC 10A PERMIT
 Description: Failure to maintain the minimum heating value for the South Flare, EPN UER037.
 EIC B18(g)(1) Mod 2D
 Self Report? NO Classification: Moderate
 Citation: 30 TAC Chapter 122, SubChapter B 122.143(4)
 30 TAC Chapter 122, SubChapter B 122.145(2)(A)
 5C THSC Chapter 382 382.085(b)
 FOP O2288 GTC OP
 Description: Failure to report deviations on a deviation report. EIC B3 MOD 2G

11 Date: 08/15/2022 (1833534)
Self Report? NO Classification: Moderate
Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)
5C THSC Chapter 382 382.085(b)
FOP O1320 SC 16 OP
NSR 5952A SC 14B PERMIT
O1320 GTC OP
Description: Failure to maintain the F6 Incinerator within the permitted temperature limit as required. EIC B18(g)(1) Mod 2D
Self Report? NO Classification: Moderate
Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)
5C THSC Chapter 382 382.085(b)
FOP O1320 GTC PERMIT
FOP O1320 SC 16 OP
NSR 5972A SC 4 PERMIT
Description: Failure to maintain the F4 Incinerator within the permitted temperature limit as required. EIC B18(g)(1) Mod 2D
Self Report? NO Classification: Moderate
Citation: 30 TAC Chapter 122, SubChapter B 122.143(4)
30 TAC Chapter 122, SubChapter B 122.145(2)(A)
5C THSC Chapter 382 382.085(b)
O1320 GTC OP
Description: Failure to report deviations on a deviation report. EIC B3 MOD 2G

12 Date: 08/30/2022 (1833615)
Self Report? NO Classification: Moderate
Citation: 30 TAC Chapter 116, SubChapter B 116.115(b)(2)(F)
30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)
5C THSC Chapter 382 382.085(b)
NSR 20160 SC 1 PERMIT
NSR 20160 SC 10A PERMIT
NSR 20160 SC 10D PERMIT
O3056 GTC OP
O3056 SC 17 OP
Description: Failure to comply with permitted emissions rates for Boilers H-K2-001 and H-K2-002, EPN STEAMGEN. EIC B18(g)(1) Mod 2D
Self Report? NO Classification: Moderate
Citation: 30 TAC Chapter 116, SubChapter B 116.115(b)(2)(F)
30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)
5C THSC Chapter 382 382.085(b)
FOP O3056 GTC OP
FOP O3056 SC 17 OP
NSR 20160 SC 1 PERMIT
NSR 20160 SC 12E PERMIT
SC 12B PERMIT
Description: Failure to comply with permitted emissions rates for Boiler H-K2-003, EPN HK-F5-003. EIC B18(g)(1) Mod 2D
Self Report? NO Classification: Moderate
Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)
5C THSC Chapter 382 382.085(b)
FOP O3056 GTC OP
FOP O3056 SC 17 OP
NSR 20160 SC 14A PERMIT
NSR 20160 SC 14I PERMIT
Description: Failure to comply with permitted emissions rates for Boiler H-K2-004, EPN HK-F5-004. EIC B18(g)(1) Mod 2D
Self Report? NO Classification: Moderate
Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)
40 CFR Chapter 60, SubChapter C, PT 60, SubPT Kb 60.113b(a)(2)
5C THSC Chapter 382 382.085(b)
FOP O3056 GTC OP
FOP O3056 SC 17 OP
FOP O3056 SC 1A OP
NSR 20160 SC 30B PERMIT
Description: Failure to conduct an annual inspection on a floating roof tank as required. EIC B18(g)(1) Mod 2D
Self Report? NO Classification: Moderate

Citation: 30 TAC Chapter 106, SubChapter A 106.4(a)(6)
 30 TAC Chapter 116, SubChapter B 116.115(b)
 30 TAC Chapter 122, SubChapter B 122.143(4)
 5C THSC Chapter 382 382.085(b)
 FOP O3056 GTC OP
 FOP O3056 SC 18 OP
 PBR 161628 GTC PERMIT

Description: Failure to submit notification of tank construction on time as required. EIC B3
 Mod 2B

Self Report? NO Classification: Moderate

Citation: 30 TAC Chapter 122, SubChapter B 122.143(4)
 30 TAC Chapter 122, SubChapter B 122.145(2)(A)
 5C THSC Chapter 382 382.085(b)
 FOP O3056 GTC OP

Description: Failure to report deviations on a deviation report as required. EIC B3 MOD
 2G

Self Report? NO Classification: Moderate

Citation: 30 TAC Chapter 101, SubChapter F 101.201(b)(2)
 30 TAC Chapter 116, SubChapter B 116.115(c)
 30 TAC Chapter 122, SubChapter B 122.143(4)
 5C THSC Chapter 382 382.085(b)
 FOP O3056 GTC OP
 FOP O3056 SC 17 OP
 FOP O3056 SC 2F OP
 NSR 20160 GTC 9 PERMIT

Description: Failure to create an accurate final record of non-reportable emissions events. EIC
 B3 Mod 2B

13 Date: 08/31/2022 (1856200)
 Self Report? YES Classification: Moderate

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

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

14 Date: 09/30/2022 (1862558)
 Self Report? YES Classification: Moderate

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

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

F. Environmental audits:

Notice of Intent Date: 09/27/2019 (1602679)

Disclosure Date: 12/18/2019

Viol. Classification: Moderate

Citation: 30 TAC Chapter 101, SubChapter A 101.20(2)
 40 CFR Chapter 63, SubChapter C, PT 63, SubPT A 63.10(b)
 40 CFR Chapter 63, SubChapter C, PT 63, SubPT G 63.151(j)

Description: Failed to report and maintain documentation for updated Hazardous Organic NESHAP (HON) applicability for F4, F6, and F5 operating units.

Viol. Classification: Moderate

Citation: 30 TAC Chapter 101, SubChapter A 101.20(2)
 40 CFR Chapter 63, SubChapter C, PT 63, SubPT F 63.100
 40 CFR Chapter 63, SubChapter C, PT 63, SubPT G 63.151(j)

Description: Failed to update the Notification of Compliance Status to reflect revised applicability for F4, F6, and F5 operating units.

Viol. Classification: Moderate

Citation: 30 TAC Chapter 101, SubChapter A 101.20(2)
 40 CFR Chapter 63, SubChapter C, PT 63, SubPT A 63.10(b)
 40 CFR Chapter 63, SubChapter C, PT 63, SubPT G 63.151(j)

Description: Failed to report and maintain detailed applicability documentation for group status determinations of the F8 operating unit.

Viol. Classification: Moderate

Citation: 30 TAC Chapter 101, SubChapter A 101.20(2)
 40 CFR Chapter 63, SubChapter C, PT 63, SubPT G 63.152(b)

Description: Failed to update and submit Notice of Compliance Status documentation for the F8 operating unit.

Viol. Classification: Moderate

Citation: 30 TAC Chapter 101, SubChapter A 101.20(2)
 40 CFR Chapter 63, SubChapter C, PT 63, SubPT G 63.115

40 CFR Chapter 63, SubChapter C, PT 63, SubPT G 63.115(a)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT G 63.115(b)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT G 63.115(c)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT G 63.115(d)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT G 63.115(e)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT G 63.115(f)

Description: Failed to maintain consistent documentation for the CO2 Vents associated with F4, F6, and F8 operating units and which adequately demonstrates Group 2 status as required.

Viol. Classification: Moderate

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

Rqmt Prov: PERMIT General Condition 1
PERMIT General Requirements 1

Description: Failed to provide accurate permit representations. Specifically, permitted maximum emissions rates for CO2 vents and wastewater fugitives are higher than actual emissions and do not align with existing Hazardous Organic NESHAP applicability determinations.

Viol. Classification: Moderate

Citation: 30 TAC Chapter 101, SubChapter A 101.20(2)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT G 63.132(a)(1)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT G 63.132(c)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT G 63.144(b)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT G 63.144(c)

Description: Failed to maintain detailed applicability documentation for several Hazardous Organic NESHAP wastewater Points of Determination.

Viol. Classification: Moderate

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

40 CFR Part 63, Subpart G 63.132(a)(2)(i)

Description: Failed to identify all Hazardous Organic NESHAP waste management units managing HON Group 1 Wastewater Streams.

Viol. Classification: Moderate

Citation: 30 TAC Chapter 101, SubChapter A 101.20(2)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT G 63.143(a)

Description: Failed to update documentation for Table 11 semiannual inspections for HON waste management units.

Viol. Classification: Moderate

Citation: 30 TAC Chapter 101, SubChapter A 101.20(2)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT G 63.148(i)

Description: Failed to update documentation for annual visual inspections for HON closed vent systems.

Viol. Classification: Moderate

Citation: 30 TAC Chapter 101, SubChapter A 101.20(2)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT G 63.110(d)

Description: Failed to prevent an incorrect application of overlap for process vents between 40 CFR Part 60, NSPS NNN/RRR and 40 CFR Part 63, Subparts F and G.

G. Type of environmental management systems (EMSs):

N/A

H. Voluntary on-site compliance assessment dates:

N/A

I. Participation in a voluntary pollution reduction program:

N/A

J. Early compliance:

N/A

Sites Outside of Texas:

N/A

Addendum to Compliance History Federal Enforcement Actions

Reg Entity Name: PORT NECHES OPERATION

Reg Entity Add: 2701 SPUR 136

Reg Entity City: PORT NECHES

Reg Entity No: RN100219252

EPA Case No: 06-2022-1708

Order Issue Date (yyyymmdd): 20220113

Case Result:

Statute: CWA **Sect of Statute:** 301/402

Classification: Minor

Program: NPDES - Base Program **Citation:**

Violation Type: Effluent Limit Violations, Not
Otherwise Specified

Cite Sect: **Cite Part:**

Enforcement Action: Administrative Compliance Orders

TEXAS COMMISSION ON ENVIRONMENTAL QUALITY



IN THE MATTER OF AN
ENFORCEMENT ACTION
CONCERNING
BLUEHALL INCORPORATED,
INDORAMA VENTURES OXIDES
INTERNATIONAL LLC, INDORAMA
VENTURES OXIDES LLC, INDORAMA
VENTURES PROPYLENE OXIDES LLC,
AND TPC GROUP LLC
RN100219252

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BEFORE THE

TEXAS COMMISSION ON

ENVIRONMENTAL QUALITY

AGREED ORDER
DOCKET NO. 2021-1200-IWD-E

I. JURISDICTION AND STIPULATIONS

On _____, the Texas Commission on Environmental Quality ("the Commission" or "TCEQ") considered this agreement of the parties, resolving an enforcement action regarding Bluehall Incorporated, Indorama Ventures Oxides International LLC, Indorama Ventures Oxides LLC, Indorama Ventures Propylene Oxides LLC, and TPC Group LLC (the "Respondents") under the authority of TEX. WATER CODE chs. 7 and 26. The Executive Director of the TCEQ, through the Enforcement Division, and the Respondents together stipulate that:

1. The Respondents own and operate a wastewater treatment facility for neighboring petrochemical, industrial gas, and synthetic rubber plants located at 2701 Spur 136 in Port Neches, Jefferson County, Texas (the "Facility"). The Facility is near or adjacent to water in the state as defined in TEX. WATER CODE § 26.001(5).
2. The Executive Director and the Respondents 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 Respondents are 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. WATER CODE ch. 26 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 Respondents of any violation alleged in Section II ("Allegations"), nor of any statute or rule.
4. An administrative penalty in the amount of \$205,104 is assessed by the Commission in settlement of the violations alleged in Section II ("Allegations"). The Respondents paid \$82,042 of the penalty and \$41,020 of the penalty is deferred contingent upon the Respondents' 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 Respondents 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, \$82,042 of the penalty shall be conditionally offset by the Respondents' timely and satisfactory completion of a Supplemental Environmental Project ("SEP") as defined in the attached SEP Agreement ("Attachment A", incorporated herein by reference). The Respondents' 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 Respondents 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 Respondents have 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 by November 30, 2020, the Respondents began collecting and analyzing samples for carbonaceous biochemical oxygen demand (5-day) at the intervals specified in the permit at the Facility.

II. ALLEGATIONS

During a record review for the Facility conducted on May 26, 2021, an investigator documented that the Respondents:

1. Failed to comply with permitted effluent limitations, in violation of 30 TEX. ADMIN. CODE § 305.125(1), TEX. WATER CODE § 26.121(a)(1), and TPDES Permit No. WQ0000511000, Effluent Limitations and Monitoring Requirements No. 1, Outfall Nos. 001, 004, 301, 601, and 701, as shown in the effluent violation tables below:

Effluent Violation Table							
Outfall No. 001				Outfall No. 004			
	CBOD5		Zinc	CBOD5		Ammonia Nitrogen	
	Daily Avg. Conc.	Daily Max. Conc.	Daily Max. Conc.	Daily Avg. Conc.	Daily Max. Conc.	Daily Avg. Conc.	Daily Max. Conc.
Monitoring Period	Limit = 10 mg/L	Limit = 30 mg/L	Limit = 0.150 mg/L	Limit = 10 mg/L	Limit = 30 mg/L	Limit = 8.0 mg/L	Limit = 15 mg/L
April 2020	c	c	c	c	40	c	c
September 2020	c	c	c	c	c	12.53	15.92
November 2020	10.36	c	c	18.62	31	c	c
December 2020	27	62	0.177	11	c	c	c
January 2021	58	58	c	35.16	46.35	8.58	c

Outfall No. 301							
	BOD5		<i>Enterococci</i>		Chem. Oxygen Demand		TSS
	Daily Avg. Load.	Daily Max. Load.	Daily Avg. Conc.	Daily Max. Conc.	Daily Avg. Load.	Daily Max. Load.	Daily Avg. Load.
Monitoring Period	Limit = 1,798 lbs/day	Limit = 4,567 lbs/day	Limit = 35 CFU/100mL	Limit = 104 CFU/100mL	Limit = 10,700 lbs/day	Limit = 20,812 lbs/day	Limit = 2,973 lbs/day
June 2020	c	c	97.95	24,200	c	c	c
July 2020	c	c	119.74	221.52	c	c	c
August 2020	c	c	159.14	7,700	c	c	c
November 2020	1,995.34	c	137.73	5,170	12,943.1	21,600.81	49,770
March 2021	c	8,999.53	c	c	c	c	c

Effluent Violation Table (continued)				
	Outfall No. 301		Outfall No. 601	Outfall No. 701
	Phenols*		Dissolved Oxygen	Dissolved Oxygen
	Daily Avg. Load.	Daily Max. Load.	Single Grab Min. Conc.	Single Grab Min. Conc.
Monitoring Period	Limit = 10 lbs/day	Limit = 20 lbs/day	Limit = 3.0 mg/L	Limit = 2.0 mg/L
July 2020	10.7	25.7	c	c
October 2020	c	c	1.15	c
November 2020	c	c	0.62	c
December 2020	c	c	c	0.39
January 2021	c	c	c	0.32

c = compliant Avg. = average Max. = maximum Min. = minimum Conc. = concentration
 Load. = loading mg/L = milligrams per liter TSS = total suspended solids No. = number
 Chem. = chemical lbs/day = pounds per day * = done quarterly

CFU/100mL = colony forming units per 100 milliliters BOD5 = biochemical oxygen demand (5-day)
 CBOD5 = carbonaceous biochemical oxygen demand (5-day)

- Failed to collect and analyze effluent samples at the intervals specified in the permit, in violation of 30 TEX. ADMIN. CODE §§ 305.125(1) and 319.5(b) and TPDES Permit No. WQ0000511000, Effluent Limitations and Monitoring Requirements No. 1, Outfall No. 001. Specifically, the Respondents did not collect and analyze a sample for carbonaceous biochemical oxygen demand (5-day) for the month of October 2020 for Outfall No. 001.

III. DENIALS

The Respondents generally deny each allegation in Section II ("Allegations").

IV. ORDERING PROVISIONS

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

- The Respondents are assessed a penalty as set forth in Section I, Paragraph No. 4. The payment of this penalty and the Respondents' 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: Bluehall Incorporated, Indorama Ventures Oxides International LLC, Indorama Ventures Oxides LLC, Indorama Ventures Propylene Oxides LLC, and TPC Group LLC, Docket No. 2021-1200-IWD-E" to:

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

2. The Respondents are jointly and severally liable for the violations documented in this Order, and are jointly and severally liable for timely and satisfactory compliance with all terms and conditions of this Order.
3. The Respondents shall implement and complete the SEP as set forth in Section I, Paragraph No. 4. The amount of \$82,042 of the assessed penalty is conditionally offset based on the Respondents' 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.
4. The Respondents shall, within 130 days after the effective date of this Order, submit written certification of compliance with the permitted effluent limitations of TPDES Permit No. WQ0000511000, including specific corrective actions that were implemented at the Facility to achieve compliance and copies of the most current self-reported discharge monitoring reports, demonstrating at least three consecutive months of compliance with all permitted effluent limitations, and include detailed supporting documentation including photographs, receipts, and/or other records to demonstrate compliance. The certification shall be signed by the Respondents 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:

Water Section Manager
Beaumont Regional Office
Texas Commission on Environmental Quality
3870 Eastex Freeway
Beaumont, Texas 77703-1830

5. All relief not expressly granted in this Order is denied.
6. The duties and provisions imposed by this Order shall apply to and be binding upon the Respondents. The Respondents are ordered to give notice of this Order to personnel who maintain day-to-day control over the Facility operations referenced in this Order.
7. 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 Respondents shall be made in writing to the Executive Director. Extensions are not effective until the Respondents receive 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.
8. This Order, issued by the Commission, shall not be admissible against the Respondents 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.
9. 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.
10. The effective date of this Order is the date it is signed by the Commission. A copy of this fully executed Order shall be provided to each of the parties.

SIGNATURE PAGE

TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

For the Commission



For the Executive Director

Date

03/29/2026

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

02/05/2026

Date

Kho Irani

Name (Printed or typed)

Authorized Representative of
Bluehall Incorporated

President & CEO

Title

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

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

SIGNATURE PAGE

TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

For the Commission

Date

Kriste Mello-Jurack

For the Executive Director

04/07/2026

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.

David Hext

Signature

2-12-26

Date

David Hext

Name (Printed or typed)
Authorized Representative of
Indorama Ventures Oxides International LLC

Operations Director Intermediate Chemicals

Title

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

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

SIGNATURE PAGE

TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

For the Commission

Date

Krista Mello-Jurack

04/07/2026

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.

Chad Anderson

Signature

2/12/2026

Date

Chad Anderson

Name (Printed or typed)

Chief Manufacturing & Technology Officer

Title

Authorized Representative of
Indorama Ventures Oxides LLC

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

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

SIGNATURE PAGE

TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

For the Commission

Date

Krista Mello-Jurack

04/07/2026

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;
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- 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.

David Hest

Signature

2-12-26

Date

David Hest

Name (Printed or typed)
Authorized Representative of
Indorama Ventures Propylene Oxides LLC

Operations Director Intermediate Chemicals

Title

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

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SIGNATURE PAGE

TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

For the Commission

Date

Krista Mallo-Jurack

04/07/2026

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:

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- 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.

Guy Buemann

Signature

2-5-26

Date

Guy Buemann

Name (Printed or typed)
Authorized Representative of
TPC Group LLC

Director of Terminals

Title

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

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

Attachment A

Docket Number: 2021-1200-IWD-E

SUPPLEMENTAL ENVIRONMENTAL PROJECT

Respondent:	Bluehall Incorporated, Indorama Ventures
Penalty Amount:	\$164,084
SEP Offset Amount:	\$82,042
Type of SEP:	Contribution to a Third-Party Pre-Approved SEP
Third-Party Administrator:	Texas Water Development Board
Project Name:	<i>Water-Level Recorder Data in Texas</i>
Total Project Budget:	\$648,829.50
Location of SEP:	Statewide; Preference for Jefferson County

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 compliance with the terms of this Attachment A.

1. **Project Description**

A. *Project*

The Respondent shall contribute the SEP Offset Amount to the **Texas Water Development Board**, as a Third-Party Administrator, for its *Water Level Recorder Data in Texas* project (the “Project”). The Project is to purchase, install, and maintain automatic water-level recorders in unused wells to satisfy updated network objectives of up to two recorders per recognized aquifer per county in Texas. The Third-Party Administrator shall use the SEP Offset Amount to perform the Project. The Project will be done in accordance with all federal, state, and local environmental laws and regulations. The contribution will be used in accordance with the SEP Agreement between the Third-Party Administrator and TCEQ.

All dollars contributed will be used solely for the cost of implementing the Project, including for 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 in any manner from this SEP.

B. *Environmental Benefit*

The groundwater stored within Texas’ major and minor aquifers is an important natural resource that is relied upon to meet the water supply demands of Texans across the state. Many factors affect the availability of this resource, including drought and increased demand. This Project will further provide real-time statewide comprehensive groundwater level data to Texas counties, cities, groundwater conservation districts, water supply companies, and individual well owners. The availability of this comprehensive data will promote awareness of the effects of drought on Texas’ aquifers and assist in groundwater management planning and use statewide.

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 Third-Party Administrator. The Respondent shall make the contribution payable to the **Texas Water Development Board**, and mail it with a copy of the Agreed Order to:

Texas Water Development Board
Attention: Finance
P.O. Box 13231
Austin, Texas 78711

3. Records and Reporting

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

Texas Commission on Environmental Quality
Enforcement Division
Attention: SEP Coordinator, MC 219
P.O. Box 13087
Austin, Texas 78711-3087
SEPReports@tceq.texas.gov

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 to TCEQ.

In the event the ED determines that the Respondent failed to fully implement and complete the contribution to 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 contribution to 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 the SEP coordinator at the address provided above.

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 contribution to the project was performed as part of the settlement of an enforcement action brought by 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 TCEQ or any other agency of the state or federal government.