**Order Type:** 1660 Agreed Order **Findings Order Justification:** N/A Media: AIR **Small Business:** No Location(s) Where Violation(s) Occurred: MCA Beaumont Site, 6350 North Twin City Highway, Nederland, Jefferson County **Type of Operation:** Chemical manufacturing plant **Other Significant Matters:** Additional Pending Enforcement Actions: No Past-Due Penalties: No Other: N/A Interested Third-Parties: None Texas Register Publication Date: August 19, 2022 Comments Received: No

## **Penalty Information**

Total Penalty Assessed: \$28,834 Amount Deferred for Expedited Settlement: \$5,766 Total Paid to General Revenue: \$23,068 Total Due to General Revenue: \$0 Payment Plan: N/A Compliance History Classifications: Person/CN - Satisfactory Site/RN - Satisfactory Major Source: Yes Statutory Limit Adjustment: N/A Applicable Penalty Policy: January 2021

## **Investigation Information**

Complaint Date(s): N/A Complaint Information: N/A Date(s) of Investigation: February 22, 2022 Date(s) of NOE(s): March 25, 2022

## **Violation Information**

1. Failed to report all instances of deviations. Specifically, the deviation report for the October 4, 2020 through March 31, 2021 reporting period did not include the deviations for failing to prevent unauthorized emissions during Incident No. 353427, failing to conduct tune-ups for the North and South Process Air Preheaters, failing to maintain records of the visual observations of the Oleum Scrubber, failing to submit an accurate final record for Incident No. 349843, failing to submit a timely initial notification for Incident No. 353427, and failing to submit an accurate final record for Incident No. 353427, and failing to submit an accurate final record for Incident No. 353427, and failing to submit an accurate final record for Incident No. 353427, and failing to submit an accurate final record for Incident No. 353427, and failing to submit an accurate final record for Incident No. 353427, and failing to submit an accurate final record for Incident No. 353427, and failing to submit an accurate final record for Incident No. 353427, and failing to submit an accurate final record for Incident No. 353427, and failing to submit an accurate final record for Incident No. 353427 [30 TEX. ADMIN. CODE §§ 122.143(4) and 122.145(2)(A), Federal Operating Permit ("FOP") No. 01959, General Terms and Conditions ("GTC"), and TEX. HEALTH & SAFETY CODE § 382.085(b)].

2. Failed to maintain a record of the visual observation of the two Oleum Storage Tanks and the Oleum Scrubber at least once per shift when the scrubber is in operation. Specifically, for a total of 109 days from September 1, 2019 through March 21, 2021, the Respondent did not maintain records of the visual observations that were conducted to ensure the Oleum Scrubber was operating properly [30 TEX. ADMIN. CODE §§ 101.20(3), 116.115(c), and 122.143(4), New Source Review ("NSR") Permit Nos. 19005 and PSDTX753, Special Conditions ("SC") No. 23, FOP No. 01959, GTC and Special Terms and Conditions ("STC") No. 14, and TEX. HEALTH & SAFETY CODE § 382.085(b)].

3. Failed to identify all of the required information on the final record for a reportable emissions event. Specifically, on February 14, 2021, the Respondent identified 598.30 pounds ("lbs") of sulfur dioxide ("SO2") on the final record for Incident No. 349843, but after further review and investigation, the Respondent indicated that the total quantity was 1,406.30 lbs of SO2 [30 Tex. ADMIN. CODE §§ 101.201(b)(1)(H) and 122.143(4), FOP No. O1959, GTC and STC No. 2.F, and Tex. HEALTH & SAFETY CODE § 382.085(b)].

4. Failed to prevent unauthorized emissions. Specifically, the Respondent released 668.16 lbs of SO2 from the Sulfuric Acid Recovery Unit Main Stack, Emissions Point Number ("EPN") SAR-SARSTK, during an emissions event (Incident No. 349843) that began on February 1, 2021 and lasted six hours and four minutes. The emissions event occurred when the converter temperatures cooled during the startup of the Sulfuric Acid Recovery North Train that led to the shutdown of the Plant, resulting in the release to the atmosphere. Since the emissions event was not caused by a sudden unavoidable breakdown of equipment or process beyond the control of the owner or operator and could have been avoided by better design and/or operational and maintenance practices, the Respondent is precluded from asserting an affirmative defense under 30 Tex. ADMIN. CODE § 101.222 [30 Tex. ADMIN. CODE §§ 101.20(3), 116.115(c), and 122.143(4), NSR Permit Nos. 19005 and PSDTX753, SC No. 1, FOP No. O1959, GTC and STC No. 14, and Tex. HEALTH & SAFETY CODE § 382.085(b)].

5. Failed to submit an initial notification for a reportable emissions event no later than 24 hours after the discovery of an emissions event. Specifically, the initial notification for Incident No. 353427 was due by March 30, 2021 at 7:00 a.m., but was not submitted until March 30, 2021 at 10:58 a.m. [30 TEX. ADMIN. CODE §§ 101.201(a)(1)(B) and 122.143(4), FOP No. O1959, GTC and STC No. 2.F, and TEX. HEALTH & SAFETY CODE § 382.085(b)].

6. Failed to identify all of the required information on the final record for a reportable emissions event. Specifically, on April 12, 2021, the Respondent identified 1,429.00 lbs SO2 on the final record for Incident No. 353427, but after further review and investigation, the Respondent indicated that the total quantity was 3,740.40 lbs of SO2 [30 TEX. ADMIN. CODE §§ 101.201(b)(1)(H) and 122.143(4), FOP No. 01959, GTC and STC No. 2.F, and TEX. HEALTH & SAFETY CODE § 382.085(b)].

7. Failed to prevent unauthorized emissions. Specifically, the Respondent released 1,428.67 lbs of SO2 from the Sulfuric Acid Recovery Unit Main Stack, EPN SAR-SARSTK, during an emissions event (Incident No. 353427) that began on March 29, 2021 and lasted 19 hours. The emissions event occurred due to a calculation error in the Distributive Control System, resulting in the release to the atmosphere. Since the Respondent did not comply with the emissions event reporting requirements, the emissions event was not caused by a sudden unavoidable breakdown of equipment or process beyond the control of the owner or operator, and the emissions event could have been avoided by better design and/or better operational and maintenance practices, the Respondent is precluded from asserting an affirmative defense under 30 Tex. ADMIN. CODE § 101.222 [30 Tex. ADMIN. CODE §§ 101.20(3), 116.115(c), and 122.143(4), NSR Permit Nos. 19005 and PSDTX753, SC No. 1, FOP No. O1959, GTC and STC No. 14, and Tex. HEALTH & SAFETY CODE § 382.085(b)].

## Corrective Actions/Technical Requirements

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

The Respondent implemented the following corrective measures:

a. Submitting the initial notification for Incident No. 353427 on March 30, 2021;

b. Ceasing operations by April 4, 2021; and

c. Providing the correct estimated total quantities for SO2 that were released during Incident Nos. 349843 and 353427 by February 22, 2022.

## **Technical Requirements:**

The Order will require the Respondent to:

a. Within 30 days, submit a revised deviation report for the October 4, 2020 through March 31, 2021 reporting period that includes the deviations for failing to prevent unauthorized emissions during Incident No. 353427, failing to conduct tune-ups for the North and South Process Air Preheaters, failing to maintain records of the visual observations of the Oleum Scrubber, failing to submit an accurate final record for Incident No. 349843, failing to submit a timely initial notification for Incident No. 353427, and failing to submit an accurate final record for Incident No. 353427, and failing to submit an accurate final record for Incident No. 353427, and failing to submit an accurate final record for Incident No. 353427, and failing to submit an accurate final record for Incident No. 353427, and failing to submit an accurate final record for Incident No. 353427, and failing to submit an accurate final record for Incident No. 353427, and failing to submit an accurate final record for Incident No. 353427, and

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

## **Contact Information**

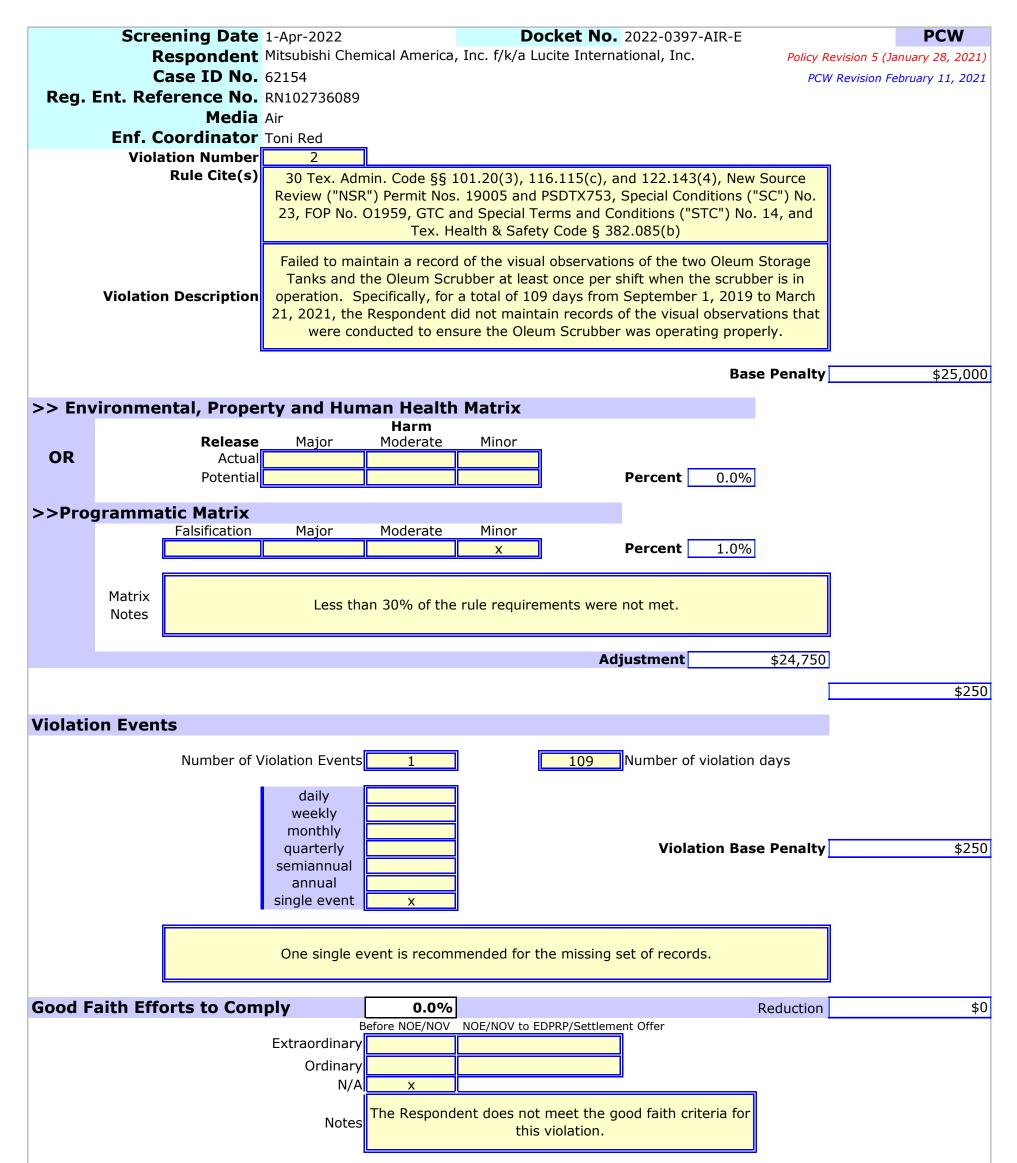
TCEQ Attorney: N/A TCEQ Enforcement Coordinator: Johnnie Wu, Enforcement Division, Enforcement Team 2, MC 219, (512) 239-2524; Michael Parrish, Enforcement Division, MC 219, (512) 239-2548 Respondent: Kevin Burgason, Regional Operations Director, Mitsubishi Chemical America, Inc. f/k/a Lucite International, Inc., 6350 North Twin City Highway, Nederland, Texas 77627 Respondent's Attorney: N/A

NO COMMISSION	Policy	/ Revi	Pe	•	alculatio	n Worksl	heet (PC	,	vision February 11, 202
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	f./Case ID	No.				No.	of Violations		
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PAYA	BLE PENA	LT	Y						\$23,06

Scree	ning Date 1-Apr-2022 Docket No. 2022-0397-AIR-E		PC
Re	spondent Mitsubishi Chemical America, Inc. f/k/a Lucite International, Inc.	Policy Revi	sion 5 (January 28, 2
Ca	se ID No. 62154	PCW R	evision February 11,
Reg. Ent. Refe	rence No. RN102736089		
	Media Air		
Enf. Co	ordinator Toni Red		
	Compliance History Worksheet		
	tory Site Enhancement (Subtotal 2)		
Component		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> )	2	10%
	Other written NOVs	2	4%
	Any agreed final enforcement orders containing a denial of liability ( <i>number of orders meeting criteria</i> )	4	80%
Orders	Any adjudicated final enforcement orders, agreed final enforcement orders without a denial of liability, or default orders of this state or the federal government, or any final prohibitory emergency orders issued by the commission	1	25%
Judgments and Consent	Any non-adjudicated final court judgments or consent decrees containing a denial of liability of this state or the federal government ( <i>number of judgments or consent decrees meeting criteria</i> )	0	0%
Decrees	Any adjudicated final court judgments and default judgments, or non-adjudicated final court judgments or consent decrees without a denial of liability, of this state or the federal government	0	0%
Convictions	Any criminal convictions of this state or the federal government ( <i>number of counts</i> )	0	0%
Emissions	Chronic excessive emissions events ( <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 (number of audits for which notices were submitted)	4	-4%
Addits	Disclosures of violations under the Texas Environmental, Health, and Safety Audit Privilege Act, 74th Legislature, 1995 ( <i>number of audits for which violations were</i> <i>disclosed</i> )	3	-6%
	Environmental management systems in place for one year or more	No	0%
	Voluntary on-site compliance assessments conducted by the executive director	No	0%
Other	under a special assistance program	NI -	00/
	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 Pere	centage (Sub	ototal 2) 109
Repeat Violator	(Subtotal 3)		
No	Adjustment Pere	centage (Sub	ototal 3) 09
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> Final Compliance	History Adjustment		, ,
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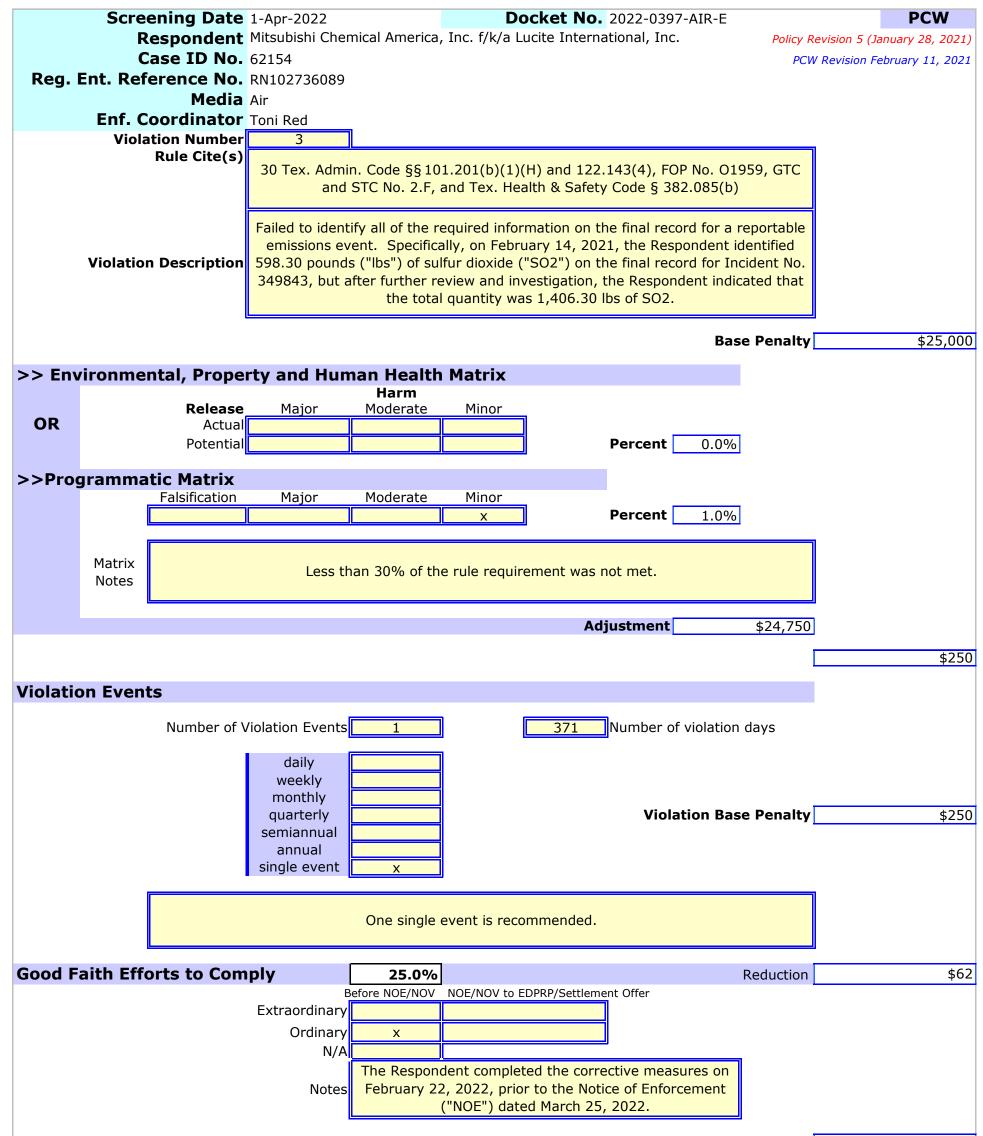
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				Adjustment	\$24,750	
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Case ID No. Reg. Ent. Reference No. Media Violation No.	Air					Percent Interest	Years of Depreciation
						5.0	15
	Item Cost	<b>Date Required</b>	Final Date	Yrs	Interest Saved	Costs Saved	EB Amount
Item Description							
Delayed Costs Equipment	r	1		0.00	\$0	\$0	\$0
Buildings				0.00	\$0	\$0	\$0
Other (as needed)				0.00	\$0	\$0	\$0
Engineering/Construction				0.00	\$0	\$0 \$0	\$0 \$0
Land				0.00	\$0	n/a	\$0
<b>Record Keeping System</b>				0.00	\$0	n/a	\$0
Training/Sampling				0.00	\$0	n/a	\$0
Remediation/Disposal				0.00	\$0	n/a	\$0
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Remediation/Disposal Permit Costs Other (as needed) Notes for DELAYED costs Notes for DELAYED costs Disposal Personnel Inspection/Reporting/Sampling Supplies/Equipment Financial Assurance	Estimated of reporting peri No. 353427, fa records of the Incident No. submit an a sh	cost to submit a r iod that includes ailing to conduct he visual observa 349843, failing t ccurate final reco ould have been r	revised deviation the deviations fo tune-ups for the tions of the Oleu o submit a timel rd for Incident N reported and the	0.00 0.00 1.84 report r failing North a m Scru y initial lo. 353 Final D tering 0.00 0.00 0.00 0.00 0.00	\$0 \$0 \$23 for the October 4, to prevent unaut and South Process bber, failing to su notification for In- 127. The Date Re- ate is the estimate <b>item (except for</b> \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	n/a n/a n/a , 2020 through Marc horized emissions d Air Preheaters, fail bmit an accurate fin cident No. 353427, quired is the date the ed date of complian <b>one-time avoidee</b> \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	\$0 \$0 \$23 ch 31, 2021 luring Incident ing to maintair al record for and failing to the deviations ce. <b>d costs)</b> \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0
Remediation/Disposal Permit Costs Other (as needed) Notes for DELAYED costs Notes for DELAYED costs Disposal Personnel Inspection/Reporting/Sampling Supplies/Equipment Financial Assurance ONE-TIME avoided costs	Estimated of reporting peri No. 353427, fa records of the Incident No. submit an a sh	cost to submit a r iod that includes ailing to conduct he visual observa 349843, failing t ccurate final reco ould have been r	revised deviation the deviations fo tune-ups for the tions of the Oleu o submit a timel rd for Incident N reported and the	0.00 0.00 1.84 report r failing North a m Scru y initial lo. 353 Final D tering 0.00 0.00 0.00 0.00 0.00 0.00 0.00	\$0 \$0 \$23 for the October 4, to prevent unaut and South Process bber, failing to su notification for Ind \$27. The Date Re- ate is the estimate <b>item (except for</b> \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	n/a n/a n/a , 2020 through Mare horized emissions d Air Preheaters, fail bmit an accurate fir cident No. 353427, quired is the date the ed date of complian so so so so so so so so so so so so so	\$0 \$0 \$23 ch 31, 2021 luring Incident ing to maintain nal record for and failing to the deviations ce. <b>d costs)</b> \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0
Remediation/Disposal Permit Costs Other (as needed) Notes for DELAYED costs Notes for DELAYED costs Disposal Personnel Inspection/Reporting/Sampling Supplies/Equipment Financial Assurance	Estimated of reporting peri No. 353427, fa records of the Incident No. submit an a sh	cost to submit a r iod that includes ailing to conduct he visual observa 349843, failing t ccurate final reco ould have been r	revised deviation the deviations fo tune-ups for the tions of the Oleu o submit a timel rd for Incident N reported and the	0.00 0.00 1.84 report r failing North a m Scru y initial lo. 353 Final D tering 0.00 0.00 0.00 0.00 0.00	\$0 \$0 \$23 for the October 4, to prevent unaut and South Process bber, failing to su notification for In- 127. The Date Re- ate is the estimate <b>item (except for</b> \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	n/a n/a n/a , 2020 through Marc horized emissions d Air Preheaters, fail bmit an accurate fin cident No. 353427, quired is the date the ed date of complian <b>one-time avoidee</b> \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	\$0 \$0 \$23 ch 31, 2021 luring Incident ing to maintair al record for and failing to the deviations ce. <b>d costs)</b> \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0



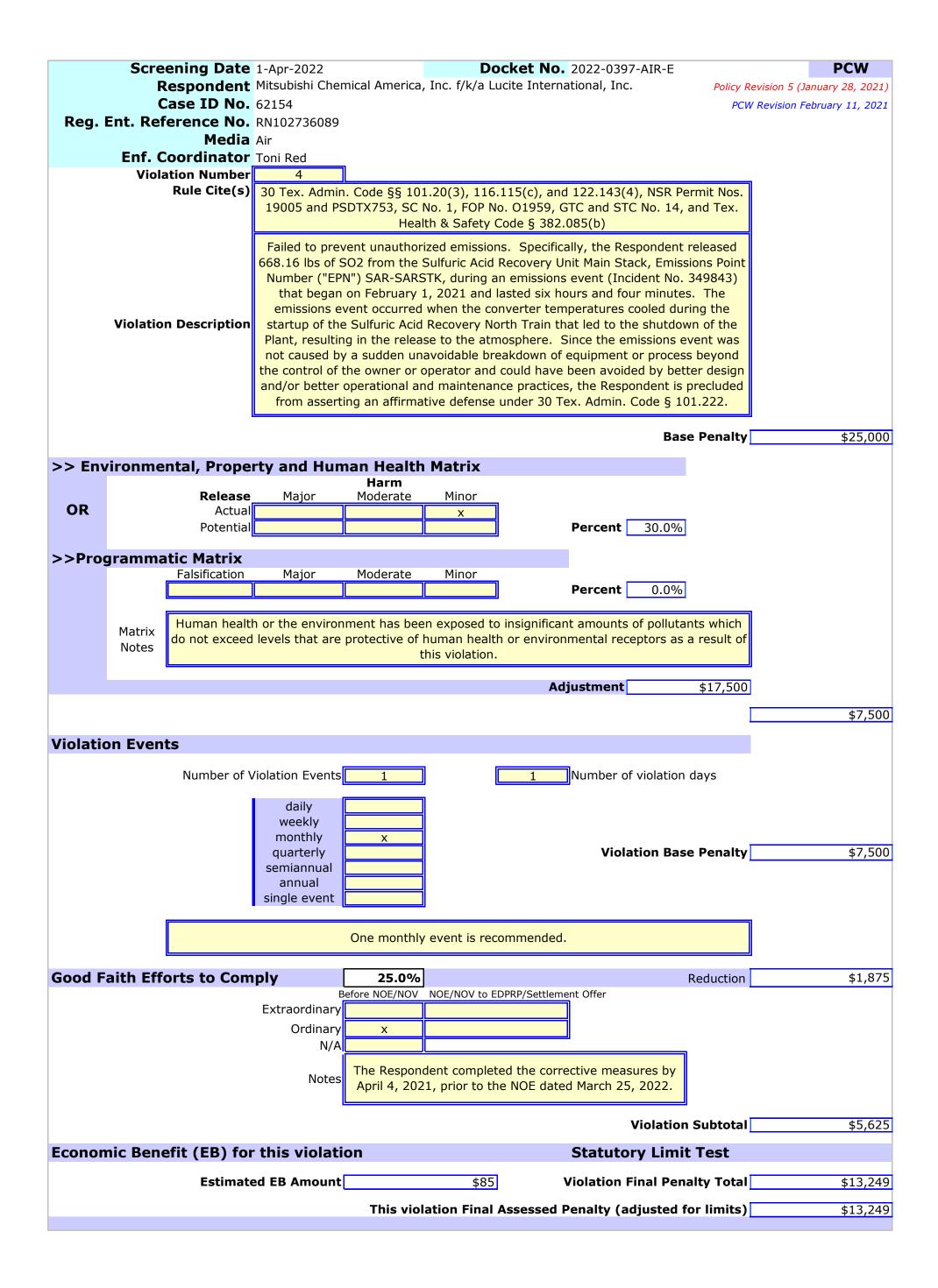
	Violation Subtotal	\$250
Economic Benefit (EB) for this violation	Statutory Limit Test	
Estimated EB Amount	\$270 Violation Final Penalty Total	\$505
	This violation Final Assessed Penalty (adjusted for limits)	\$505

	E	conomic	Benefit	Wor	ksheet		
Respondent	Mitsubishi Che	emical America, In	c. f/k/a Lucite I	nternati	ional, Inc.		
Case ID No.							
leg. Ent. Reference No.							
Media							Years of
Violation No.						<b>Percent Interest</b>	Depreciation
	2					5.0	15
	Item Cost	Date Required	Final Date	Vrc	Interest Saved	Costs Saved	EB Amount
Item Description	Item cost	Bate Required	That Date	115	Interest Savea		ED Amount
Item Description							
Delayed Costs	ľ	1 1			±0	+0	<b>#0</b>
Equipment				0.00	\$0	\$0	\$0
Buildings				0.00	\$0	\$0	\$0
Other (as needed)				0.00	\$0	\$0	\$0
Engineering/Construction				0.00	\$0	\$0	\$0
Land				0.00	\$0	n/a	\$0
Record Keeping System				0.00	\$0	n/a	\$0
Training/Sampling				0.00	\$0	n/a	\$0
Remediation/Disposal				0.00	\$0	n/a	\$0
Permit Costs Other (as needed)				0.00	<u>\$0</u> \$0	n/a n/a	<u>\$0</u> \$0
Notes for DELAYED costs							
Avoided Costs	ANNU	ALIZE avoided c	osts before en	tering	item (except for	one-time avoide	d costs)
Disposal				0.00	\$0	\$0	\$0
Personnel				0.00	\$0	\$0	\$0
inspection/Reporting/Sampling				0.00	\$0	\$0	\$0
Supplies/Equipment				0.00	\$0	\$0	\$0
Financial Assurance				0.00	\$0	\$0	\$0
ONE-TIME avoided costs				0.00	\$0	\$0	\$0
Other (as needed)	\$250	1-Sep-2019	4-Apr-2021	1.59	\$20	\$250	\$270
Notes for AVOIDED costs			properly. The	Date R		nat were conducted Il date of non-comp I.	
Approx. Cost of Compliance		\$250			TOTAL		\$270



	Violation Subtotal	\$188
Economic Benefit (EB) for this violation	Statutory Limit Test	
Estimated EB Amount	\$13 Violation Final Penalty Total	\$442
	This violation Final Assessed Penalty (adjusted for limits)	\$442

eg. Ent. Reference No. Media	Air					Percent Interest	Years of
Violation No.	3					5.0	Depreciation
	Item Cost	Date Required	Final Date	Vrc	Interest Saved	Costs Saved	EB Amount
Item Description		Date Required	i mai bate	113	Interest Saved	costs saved	LD Amount
Item Description							
Delayed Costs							
Equipment				0.00	\$0	\$0	\$0
Buildings				0.00	\$0	\$0 \$0	<u>\$0</u> \$0
Other (as needed)				0.00	\$0	\$0	\$0
Engineering/Construction	-			0.00	\$0	\$0	\$0
Land				0.00	\$0	n/a	\$0
<b>Record Keeping System</b>				0.00	\$0	n/a	\$0
Training/Sampling				0.00	\$0	n/a	\$0
				0.00	\$0	n/n	\$0
Remediation/Disposal						n/a	
Permit Costs				0.00	\$0	n/a	\$0
	\$250 Estimated co	16-Feb-2021 ost to provide the	22-Feb-2022 correct estimate	0.00 1.02	\$0 \$13		\$0 \$13
Permit Costs Other (as needed) Notes for DELAYED costs	Estimated co No. 349843	ost to provide the 3. The Date Requ	correct estimate ired is the date	0.00 1.02 ed total the fina complia	\$0 \$13 quantity for SO2 t I record was due a ance.	n/a n/a hat was released du and the Final Date is	\$0 <u>\$13</u> uring Incident the date of
Permit Costs Other (as needed) Notes for DELAYED costs Avoided Costs	Estimated co No. 349843	ost to provide the 3. The Date Requ	correct estimate ired is the date	0.00 1.02 ed total the fina complia	\$0 \$13 quantity for SO2 t I record was due a ance. item (except for	n/a n/a that was released du and the Final Date is one-time avoided	\$0 \$13 uring Incident the date of d costs)
Permit Costs Other (as needed) Notes for DELAYED costs <b>Avoided Costs</b> Disposal	Estimated co No. 349843	ost to provide the 3. The Date Requ	correct estimate ired is the date	0.00 1.02 ed total the fina complia <b>tering</b> 0.00	\$0 \$13 quantity for SO2 to ance. item (except for \$0	n/a n/a that was released du and the Final Date is one-time avoided \$0	\$0 \$13 uring Incident the date of d costs) \$0
Permit Costs Other (as needed) Notes for DELAYED costs <b>Avoided Costs</b> Disposal Personnel	Estimated co No. 349843	ost to provide the 3. The Date Requ	correct estimate ired is the date	0.00 1.02 ed total the fina complia tering 0.00 0.00	\$0 \$13 quantity for SO2 to l record was due a ance. item (except for \$0 \$0 \$0	n/a n/a that was released du and the Final Date is one-time avoided \$0 \$0	\$0 \$13 uring Incident the date of d costs) \$0 \$0 \$0
Permit Costs Other (as needed) Notes for DELAYED costs <b>Avoided Costs</b> Disposal Personnel nspection/Reporting/Sampling	Estimated co No. 349843	ost to provide the 3. The Date Requ	correct estimate ired is the date	0.00 1.02 ed total the fina complia tering 0.00 0.00 0.00	\$0 \$13 quantity for SO2 to ance. item (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	n/a n/a that was released du and the Final Date is one-time avoided \$0 \$0 \$0	\$0 \$13 uring Incident the date of d costs) \$0 \$0 \$0 \$0 \$0
Permit Costs Other (as needed) Notes for DELAYED costs <b>Avoided Costs</b> Disposal Personnel nspection/Reporting/Sampling Supplies/Equipment	Estimated co No. 349843	ost to provide the 3. The Date Requ	correct estimate ired is the date	0.00 1.02 the fina complia tering 0.00 0.00 0.00 0.00	\$0 \$13 quantity for SO2 to ance. item (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	n/a n/a that was released du and the Final Date is one-time avoided \$0 \$0 \$0 \$0 \$0 \$0	\$0 \$13 uring Incident the date of <b>d costs)</b> \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0
Permit Costs Other (as needed) Notes for DELAYED costs <b>Avoided Costs</b> Disposal Personnel inspection/Reporting/Sampling Supplies/Equipment Financial Assurance	Estimated co No. 349843	ost to provide the 3. The Date Requ	correct estimate ired is the date	0.00 1.02 the fina complia tering 0.00 0.00 0.00 0.00 0.00	\$0 \$13 quantity for SO2 to ance. item (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	n/a n/a hat was released du and the Final Date is one-time avoided \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	\$0 \$13 uring Incident the date of <b>d costs)</b> \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0
Permit Costs Other (as needed) Notes for DELAYED costs <b>Avoided Costs</b> Disposal Personnel nspection/Reporting/Sampling Supplies/Equipment Financial Assurance ONE-TIME avoided costs	Estimated co No. 349843	ost to provide the 3. The Date Requ	correct estimate ired is the date	0.00 1.02 the fina complia tering 0.00 0.00 0.00 0.00 0.00 0.00	\$0 \$13 quantity for SO2 to ance. item (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	n/a n/a hat was released du and the Final Date is one-time avoided \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	\$0 \$13 uring Incident the date of d costs) \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0
Permit Costs Other (as needed) Notes for DELAYED costs <b>Avoided Costs</b> Disposal Personnel nspection/Reporting/Sampling Supplies/Equipment Financial Assurance	Estimated co No. 349843	ost to provide the 3. The Date Requ	correct estimate ired is the date	0.00 1.02 the fina complia tering 0.00 0.00 0.00 0.00 0.00	\$0 \$13 quantity for SO2 to ance. item (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	n/a n/a hat was released du and the Final Date is one-time avoided \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	\$0 \$13 uring Incident the date of <b>d costs)</b> \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0

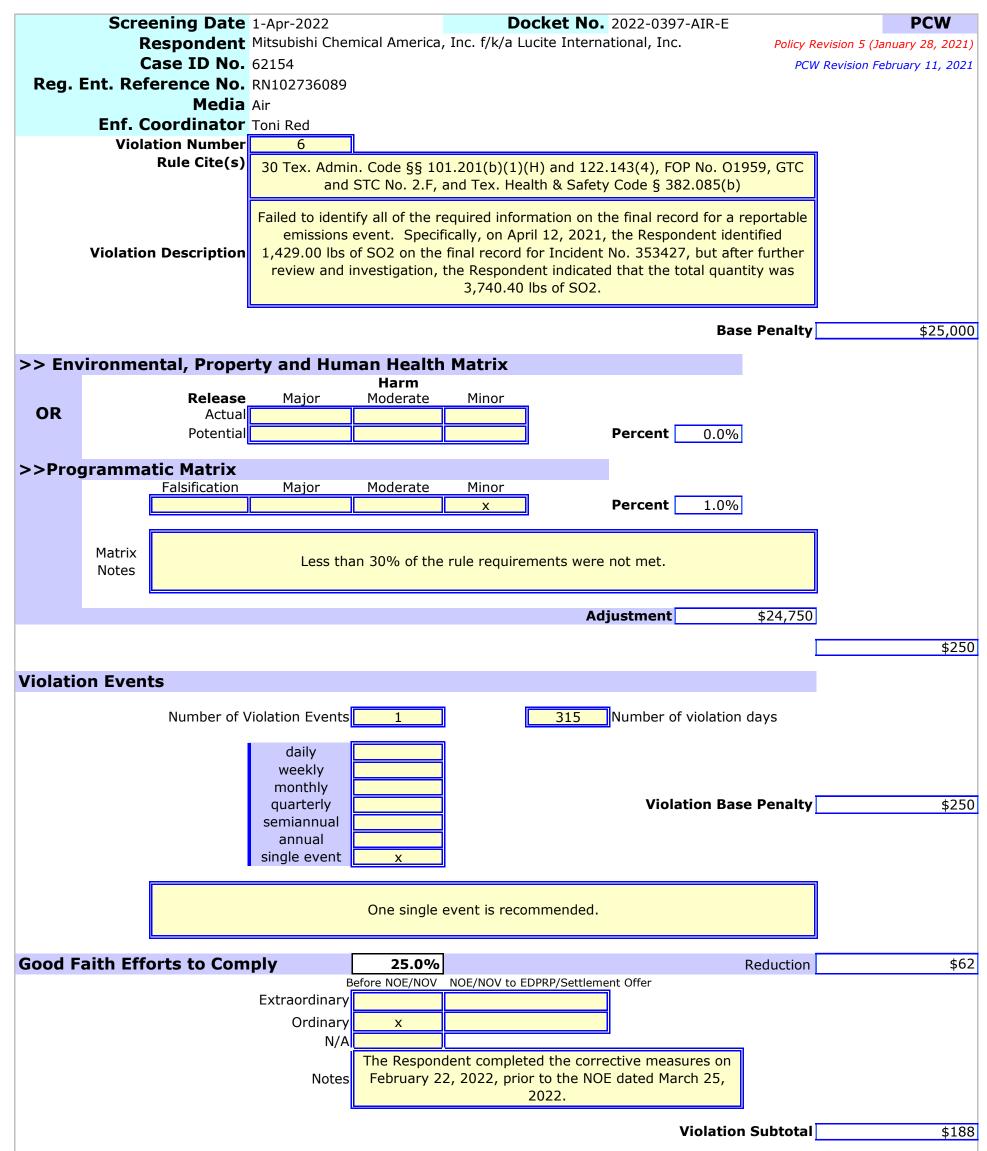


		conomic	Benefit	Woi	rksheet		
Respondent	Mitsubishi Che	emical America, In	c. f/k/a Lucite I	nternati	ional, Inc.		
Case ID No.							
eg. Ent. Reference No.							
-							Varia of
Media						<b>Percent Interest</b>	Years of
Violation No.	4						Depreciation
						5.0	1.
	Item Cost	<b>Date Required</b>	Final Date	Yrs	<b>Interest Saved</b>	Costs Saved	EB Amount
Item Description							
Item Description							
Delayed Costs	Ir				+0	+0	+0
Equipment				0.00	\$0	\$0	\$0
Buildings				0.00	\$0	\$0	\$0
Other (as needed)				0.00	\$0	\$0	\$0
Engineering/Construction				0.00	\$0 \$0	\$0 n/a	\$0 <b>\$0</b>
Land Record Keeping System				0.00	\$0	n/a	<u>\$0</u> \$0
Training/Sampling				0.00	\$0	n/a	<u> </u>
Remediation/Disposal				0.00	\$0	n/a	<u> </u>
Permit Costs				0.00	\$0	n/a	<u> </u>
Other (as needed)	\$10,000	1 Eab 2021	4 4 2021				
		<u>1-Feb-2021</u>	4-Apr-2021	0.17	\$85	<u>n/a</u>	\$85
Notes for DELAYED costs			ations. The Dat	e Requi		e emissions event be	
	Estimated o	ost to cease opera	ations. The Dat Final Date is t	e Requi he date	red is the date the operations ceased	e emissions event be	egan and the
Notes for DELAYED costs	Estimated o	ost to cease opera	ations. The Dat Final Date is t	e Requi he date tering	red is the date the operations ceased item (except for \$0	e emissions event be d. • <b>one-time avoide</b> \$0	egan and the d costs) \$0
Notes for DELAYED costs Avoided Costs Disposal Personnel	Estimated o	ost to cease opera	ations. The Dat Final Date is t	e Requi he date tering 0.00 0.00	red is the date the operations ceased item (except for \$0 \$0	e emissions event be d. • <b>one-time avoide</b> \$0 \$0	egan and the d costs) \$0 \$0
Notes for DELAYED costs Avoided Costs Disposal Personnel nspection/Reporting/Sampling	Estimated o	ost to cease opera	ations. The Dat Final Date is t	e Requi he date tering 0.00 0.00 0.00	red is the date the operations ceased item (except for \$0 \$0 \$0 \$0	e emissions event be d. • <b>one-time avoide</b> \$0 \$0 \$0 \$0	egan and the d costs) \$0 \$0 \$0 \$0
Notes for DELAYED costs Avoided Costs Disposal Personnel nspection/Reporting/Sampling Supplies/Equipment	Estimated o	ost to cease opera	ations. The Dat Final Date is t	e Requi he date tering 0.00 0.00 0.00 0.00	red is the date the operations ceased item (except for \$0 \$0 \$0 \$0 \$0 \$0	e emissions event be d. • one-time avoide \$0 \$0 \$0 \$0 \$0 \$0	egan and the d costs) \$0 \$0 \$0 \$0 \$0 \$0 \$0
Notes for DELAYED costs Avoided Costs Disposal Personnel nspection/Reporting/Sampling Supplies/Equipment Financial Assurance	Estimated o	ost to cease opera	ations. The Dat Final Date is t	e Requi he date tering 0.00 0.00 0.00 0.00 0.00	red is the date the operations ceased item (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	e emissions event be d. • <b>one-time avoide</b> \$0 \$0 \$0 \$0 \$0 \$0 \$0	egan and the d costs) \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0
Notes for DELAYED costs Avoided Costs Disposal Personnel nspection/Reporting/Sampling Supplies/Equipment Financial Assurance ONE-TIME avoided costs	Estimated o	ost to cease opera	ations. The Dat Final Date is t	e Requi he date tering 0.00 0.00 0.00 0.00 0.00 0.00	red is the date the operations ceased item (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	e emissions event be d. <b>one-time avoide</b> \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	egan and the d costs) \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0
Notes for DELAYED costs <b>Avoided Costs</b> Disposal Personnel nspection/Reporting/Sampling Supplies/Equipment Financial Assurance	Estimated o	ost to cease opera	ations. The Dat Final Date is t	e Requi he date tering 0.00 0.00 0.00 0.00 0.00	red is the date the operations ceased item (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	e emissions event be d. • <b>one-time avoide</b> \$0 \$0 \$0 \$0 \$0 \$0 \$0	egan and the d costs) \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0
Notes for DELAYED costs Avoided Costs Disposal Personnel nspection/Reporting/Sampling Supplies/Equipment Financial Assurance ONE-TIME avoided costs	Estimated o	ost to cease opera	ations. The Dat Final Date is t	e Requi he date tering 0.00 0.00 0.00 0.00 0.00 0.00	red is the date the operations ceased item (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	e emissions event be d. <b>one-time avoide</b> \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	egan and the d costs) \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0

Respondent       Misubiai       Charles No. 62154         Reg. Ent. Reference No. 8010735089       Media Ar         Enf. Coordinator       Tool Ref         Violation Number       30 Tex. Admin. Code §5 101,201(a)(1/(8) and 122,143(4), FOP No. 01959, GTC and STC No. 2, and Tex. Health X Safety Code §3 38,085(h)         Violation Number       Failed to submit an initial notification for a reportable emissions event. Societally, the initial multification for Trodern No. 335427 was due by March 30, 2021 at 7:00 a.m., but was not submitted und March 30, 2021, prior to the NOL March 25, 2025		Scre	ening Date	1-Apr-2022		Do	ocket No.	2022-039	7-AIR-E		PO	CW
Reg. Ent. Reference No. RN122728089 Media Ar Enf. Coordinator Toxi Red Violation Number 5 Rule Cite(s) 30 Tex. Admin. Code §5 103.201(a)(1)(8) and 122.143(4), FOP No. 01959, GTC and STC No. 2.F, and Tex. Health & Safety Code § 382.085(b)			•		nical America,	Inc. f/k/a L	ucite Interna	ational, Inc	•	Policy R	evision 5 (January 2	8, 2021)
Wedia Air       Violation Number       30 Tex. Admin. Code §5 101.201(a)(1)(8) and 122.143(4), FOP No. 01959, GTC and STC No. 2, F, and Tex. Health & Safety Code § 382.085(b)       Violation Description       Failed to submit an initial notification for a reportable emissions event. Specifically, the initial notification for Incident No. 35342/ Was due by Warch 30, 2021 at 7100 a.m., but was not submitted until March 30, 2021 at 10:58 a.m.       Base Penalty       925,001       Programmatic Matrix       Major       Moderate Minor       Percent     0.0%       Adjustment       Percent     1.0%       Violation Events       Major     Moderate Minor       Percent     1.0%       Violation Events       Main     Minor       Adjustment     224,750       Violation Events       One single event is recommended.       Good Faith Efforts to Comply     25.099       Violation Base Penalty     5251       One single event is recommended.       Ordinary     Single event is recommended.       Or	_									PCV	V Revision February	11, 2021
Enf. Coordinator Tori Red         Violation Number 2         Rule Cite(s)         30 Tex. Admin. Code §§ 101.201(a)(1)(8) and 122.143(4), FOP No. 01959, GTC and STC No. 2.F, and Tex. Health & Safety Code § 382.085(b)         Failed to subprit an inklu notification for a reportable emissions event no latter than 24 hours after the discovery of an emissions event. No. 2021 at 7:00 a.m., but was not submitted until March 30, 2021 at 7:00 a.m., but was not submitted until March 30, 2021 at 7:00 a.m., but was not submitted until March 30, 2021 at 7:00 a.m.         OR       Release Major       Moderate Moderate       Minor         OR       Actual Actual Potential       Moderate Moderate       Minor         OR       Actual Moderate       Minor       0.0%         >>Programmatic Matrix       Faledification       Major       Moderate       Minor         Violation Events       Image: Major       Moderate       0.0%       4251         Violation Events       Image: Major       Moderate       925,700         Violation Events       Image: Major       Moderate       926,720         Violation Events       Image: Major       925,700         Viola	Reg.	Ent. Ref										
Violation Number       5         30 Tex. Admin. Code §§ 101.201(a)(1)(B) and 122,143(4), FOP No. 01959, GTC and STC No. 2, F, and Tex. Health & Safety Code § 382.005(b)         Failed to submit an initial notification for a reportable emissione event no later than 24 hours after the discovery of an emissions event. Specifically, the initial notification for Incident No. 353427 was due by March 30, 2021 at 7:00 a. m., but was not submitted until March 30, 2021 at 10:58 a.m.         Base Penalty         \$25,001         > Environmental, Property and Human Health Matrix Harm         Maint Matrix         Harm         OR         Adjustment         Percent         OR         Adjustment         Percent         OR         Adjustment         Percent         OR         Adjustment         Percent         OR         Adjustment         Staff.com         Major         Major         Adjustment         Staff.com         Violation Events         Number of Violation Even		Enf (										
Rule Cite(s)       30 Tex. Admin. Cade §\$ 101.201(a)(1)(B) and 122.143(4), FOP No. 01959, GTC and STC No. 2.F, and Tex. Heath & Safety Code § 382.085(b)         Violation Description       Pailed to submit an initial notification for a reportable emissions event no later than 24 hours after the discovery of an emissions event. Note initial notification for incident No. 353422 was due by March 30, 2021 at 7:00 a.m., but was not submitted until March 30, 2021 at 10:58 a.m.         OR       Release       Major       Moderate       Minor         OR       Release       Major       Moderate       Minor         Porgrammatic Matrix       Base Penalty       625.000         >> Programmatic Matrix       Base Penalty       625.000         Matrix       Less than 30% of the rule requirements were not met.       0.0%         Violation Events       Adjustment       524,750         Violation Events       Image: Penalty       525         Ore single event is recommended.       Good Faith Efforts to Comply       25.0%         Ordinary       Z.50%       Reduction       56         Ordinary       Z.50%       Reduction       56         Violation Base Penalty       525       525         Violation Base Penalty       525       525         Matrix       Unservice       Second Faith Efforts to Comply       50.0% <t< th=""><th></th><th></th><th></th><th></th><th></th><th></th><th></th><th></th><th></th><th></th><th></th><th></th></t<>												
30 Tex. Admin. Code §5 101.201(q)(1)(8) and 122.143(4), FOP No. 01595, GTC and STC No. 2, 7, and Tex. Health & Sefery Code § 382.085(b) Failed to submit an initial notification for a reportable ensistence swent no later than 24 hours after the discovery of an emissions event. Specifically, the initial notification for Incident No. 353427 wis due by March 30, 2021 at 7:00 am., but was not submitted until March 30, 2021 at 1:02 am., but was not submitted until March 30, 2021 at 1:02 am., but was not submitted and March 30, 2021 at 1:02 am., but was not submitted S25,000 >> Environmental, Property and Human Health Matrix Release Major Moderate Minor Potential Percent 0.0% >> Programmatic Matrix Less than 30% of the rule requirements were not met. Notes Violation Events Number of Violation Events 1 Number of violation days dialy weekly u quartery Setimationual am single event is recommended. Good Faith Efforts to Comply 25.0% Cone single event is recommended. Good Faith Efforts to Comply 25.0% Notes The Respondent completed the corrective measures by March 30, 2021, prior to the NOE date March 25, 2022.					<u> </u>							
Violation Description       Nours after the discovery of an emissions event. Specifically, the initial notification for Incident No. 353427 was due by March 30, 2021 at 70:08 a.m., but was not submitted until March 30, 2021 at 10:58 a.m.         See Penalty       \$25,000         >> Environmental, Property and Human Health Matrix       Harm         OR       Release       Major         Actual       Moderate       Minor         Portential       Percent       0.0%         >> Programmatic Matrix       Fasification       Major         Fasification       Major       Moderate         Motors       Less than 30% of the rule requirements were not met.       1.0%         Violation Events       1       Number of Violation Events       \$24,750         Violation Events       1       Number of Violation Events       \$25,050         One single event is recommended.       Social annual				30 Tex. Adm						GTC and		
>> Environmental, Property and Human Health Matrix Harm Moderate Minor Potential Potential Potential Potential Potential Potential Potential Potential Potential Potential Potential Potential Percent 0.0% Percent 0.0% Percent 1.0% Matrix Notes Less than 30% of the rule requirements were not met. Adjustment \$24,750 Second Faith Efforts to Comply 25.0% Semiannual angle event is recommended. Second Faith Efforts to Comply 25.0% Set Potential Second Paith Efforts to Comply 25.0% Set Potential Potential Potential Potential Potential Potential Percent 0.0% Percent 0.0% Percent 1.0% Violation Base Penalty 5250 Set Potential		Violatio	n Description	hours after th	ne discovery o 353427 was d	f an emissio ue by March	ns event. S 30, 2021 at	pecifically, t 7:00 a.m	the initial notifi	cation for		
OR       Harm Actual       Harm Moderate       Percent       0.0%         >>Programmatic Matrix Falsification       Falsification       Major       Percent       1.0%         Matrix Notes       Less than 30% of the rule requirements were not met.       4djustment       \$224,750         Violation       Events       \$231         Violation       Events       \$253         One single event is recommended.       Yiolation Base Penalty       \$259         One single event is recommended.       Second Faith Efforts to Comply       25.0%         Extraordinary       X       Reduction       \$66         Violation Base Penalty       \$251       \$66         Second Faith Efforts to Comply       25.0%       Reduction       \$66         Violation Respondent completed the corrective measures by March 30, 2021, prior to the NOE dated March 25, 2022.       Secondent Completed the corrective measures by March 30, 2021, prior to the NOE dated March 25, 2022.									Bas	se Penalty	\$	25,000
OR       Release Major Moderate Minor Potential       Percent 0.0%         >>Programmatic Matrix Falsification Major Moderate Minor Falsification Major Moderate Minor Matrix Notes       Percent 0.0%         Matrix Notes       Less than 30% of the rule requirements were not met.       10%         Matrix Notes       Less than 30% of the rule requirements were not met.       \$24,750         Violation Events       1       1       Number of violation days         Violation Events       1       1       Number of violation days         daily quarterly annual single event       violation Base Penalty       \$250         Cone single event is recommended.       Second Faith Efforts to Comply       25.0%       Reduction       \$60         Second Faith Efforts to Comply       25.0%       NoterNOV NOE/NOV to EDORP/Settlement Offer       Second Faith Efforts to Complex the Respondent completed the corrective measures by March 30, 2021, prior to the NOE dated March 25, 2022.       Second Faith March 25, 2022.	>> Env	/ironme	ntal, Prope	rty and Hun		Matrix						
OR       Actual       Percent       0.0%         >>Programmatic Matrix       Percent       0.0%         >>Programmatic Matrix       Percent       1.0%         Matrix       Less than 30% of the rule requirements were not met.       4djustment       \$24,750         Adjustment       \$24,750       \$251         Violation Events			Release	Major		Minor						
>>Programmatic Matrix          Falsification       Major       Moderate       Minor         Percent       1.0%         Matrix       Less than 30% of the rule requirements were not met.         Adjustment       \$24,750         Violation Events       1         Number of Violation Events       1         Violation Events       1         Number of Violation Events       1         Violation Base Penalty       \$250         Semiannual annual	OR				Moderate	Phillip						
Falsification       Major       Moderate       Minor         Matrix       Less than 30% of the rule requirements were not met.       Adjustment       \$24,750         Adjustment       \$24,750       \$256         Violation Events       1       Number of violation days         Violation Events       1       Number of violation days         Violation Base Penalty       \$256         One single event is recommended.       \$250         Good Faith Efforts to Comply       25.0%         Refore NOF/NOV NOF/NOV to EDRR/Settlement Offer       \$60         Extraordinary       x         Notes       The Respondent completed the corrective measures by March 30, 2021, prior to the NOE dated March 25, 2022.			Potential					Percent	0.0%	]		
Falsification       Major       Moderate       Minor         Matrix       Less than 30% of the rule requirements were not met.       Adjustment       \$24,750         Adjustment       \$24,750       \$256         Violation Events       1       Number of violation days         Violation Events       1       Number of violation days         Violation Base Penalty       \$256         One single event is recommended.       \$250         Good Faith Efforts to Comply       25.0%         Refore NOF/NOV NOF/NOV to EDRR/Settlement Offer       \$60         Extraordinary       x         Notes       The Respondent completed the corrective measures by March 30, 2021, prior to the NOE dated March 25, 2022.			tie Metrix									
Matrix Notes       Less than 30% of the rule requirements were not met.         Adjustment       \$24,750         Adjustment       \$24,750         Violation Events       \$250         Violation Events       1         Number of Violation Events       1         Violation Base Penalty       \$250         Good Faith Efforts to Comply       25.0%         Extraordinary       Reduction         Sefore NDE/NOV to EDRR/Settlement Offer         Extraordinary       x         Notes       The Respondent completed the corrective measures by March         30, 2021, prior to the NOE dated March 25, 2022.	>>Prog	gramma		Major	Moderate	Minor						
Notes       Less than 30% of the rule requirements were not met.         Adjustment       \$24,750         \$250       \$250         Violation Events       1         Number of Violation Events       1         Violation Base Penalty       \$250         Semiannual annual single event       x         One single event is recommended.       Sedore NOE/NOV to EDDRP/Settlement Offer         Extraordinary       x         N/A       Notes         The Respondent completed the corrective measures by March 30, 2021, prior to the NOE dated March 25, 2022.       —					Moderate			Percent	1.0%	]		
Notes       Less than 30% of the rule requirements were not met.         Adjustment       \$24,750         \$250       \$250         Violation Events       1         Number of Violation Events       1         Violation Base Penalty       \$250         Semiannual annual single event       x         One single event is recommended.       Sedore NOE/NOV to EDDRP/Settlement Offer         Extraordinary       x         N/A       Notes         The Respondent completed the corrective measures by March 30, 2021, prior to the NOE dated March 25, 2022.       —			L		··							
Yiolation Events				Less	than 30% of t	he rule requ			t.			
Violation Events          Number of Violation Events       1       1       Number of violation days         daily							Ad	justment		\$24,750		
Number of Violation Events       1       Number of violation days         daily       weekly         monthly       quarterly         semiannual       single event         single event       x         One single event is recommended.       \$60         Good Faith Efforts to Comply       25.0%         Reduction       \$60         Before NOE/NOV to EDPRP/Settlement Offer         Extraordinary       x         N/A       Notes         The Respondent completed the corrective measures by March 30, 2021, prior to the NOE dated March 25, 2022.												\$25
daily       weekly         monthly       quarterly         semiannual       annual         annual       x         Single event       x         One single event is recommended.       Reduction         Good Faith Efforts to Comply       25.0%         Refore NOE/NOV       NOE/NOV to EDPRP/Settlement Offer         Extraordinary       Notes         The Respondent completed the corrective measures by March         30, 2021, prior to the NOE dated March 25, 2022.	Violatio	on Even	ts									·
weekly monthly quarterly semiannual single event       Violation Base Penalty       \$250         One single event is recommended.       0ne single event is recommended.       \$62         Good Faith Efforts to Comply       25.0%       Reduction       \$62         Before NOE/NOV       NOE/NOV to EDPRP/Settlement Offer       \$62         Ordinary       x       X       X         Notes       The Respondent completed the corrective measures by March 30, 2021, prior to the NOE dated March 25, 2022.       Second Secon			Number of V	Violation Events	1		1	Number o	f violation days			
Good Faith Efforts to Comply       25.0%       Reduction       \$62         Before NOE/NOV       NOE/NOV to EDPRP/Settlement Offer       \$62         Ordinary       x       \$63         N/A       \$64       \$65         The Respondent completed the corrective measures by March       \$0, 2021, prior to the NOE dated March 25, 2022.				weekly monthly quarterly semiannual annual					Violation Ba	se Penalty		\$250
Before NOE/NOV       NOE/NOV to EDPRP/Settlement Offer         Extraordinary					One sing	le event is r	ecommende	d.				
Extraordinary Cordinary X Cordinary X N/A The Respondent completed the corrective measures by March 30, 2021, prior to the NOE dated March 25, 2022.	Good F	aith Eff	orts to Com			NOF/NOV to F		ent Offer		Reduction		\$62
N/A The Respondent completed the corrective measures by March Notes 30, 2021, prior to the NOE dated March 25, 2022.												
Notes The Respondent completed the corrective measures by March 30, 2021, prior to the NOE dated March 25, 2022.												
Violation Subtotal \$188					The Respond							
									Violatio	n Subtotal		\$188

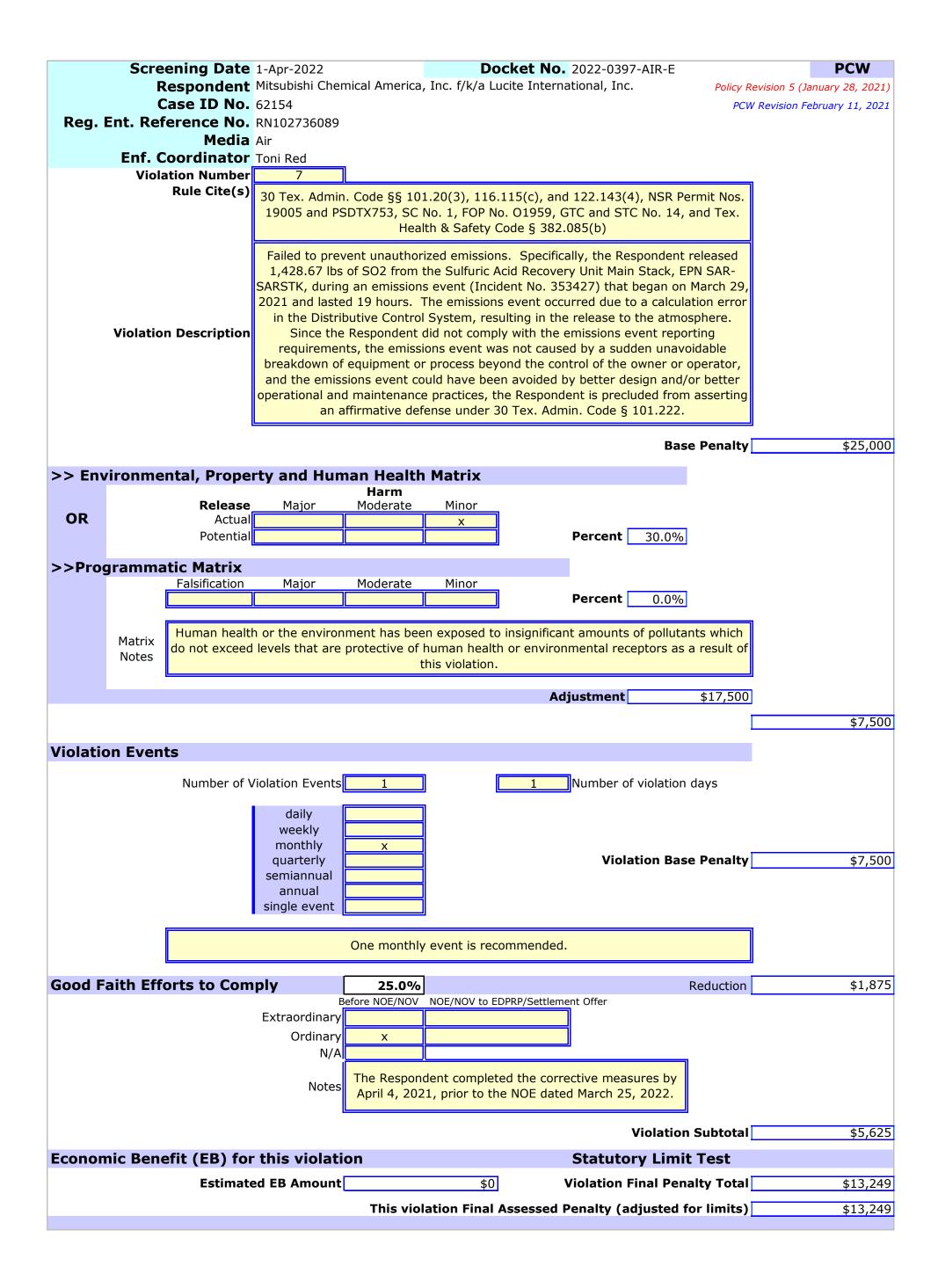
Economic Benefit (EB) for this violation	Statutory Limit Test	
Estimated EB Amount	\$0 Violation Final Penalty Tota	\$442
	This violation Final Assessed Penalty (adjusted for limits	\$442

	E	conomic	Benefit	Wor	rksheet		
Pesnondent		emical America, In					
		sinical America, in		nternati			
Case ID No.							
leg. Ent. Reference No.		)					
Media						<b>Percent Interest</b>	Years of
Violation No.	5						Depreciation
						5.0	1
	Item Cost	Date Required	Final Date	Vrc	Interest Saved	Costs Saved	<b>EB</b> Amount
These Decemination		Bate Required	That Date	113	Interest Saved		ED Amount
Item Description							
Delayed Costs	·			=			
Equipment	-			0.00	\$0	\$0	\$0
Buildings				0.00	\$0	\$0	\$0
Other (as needed)				0.00	\$0	\$0	\$0
Engineering/Construction				0.00	\$0	\$0	\$0
Land				0.00	\$0	n/a	\$0
Record Keeping System				0.00	\$0	n/a	\$0
Training/Sampling				0.00	\$0	n/a	\$0
Remediation/Disposal				0.00	\$0	n/a	\$0
Permit Costs Other (as needed)	\$250	30-Mar-2021	30-Mar-2021	0.00	\$0 \$0	n/a n/a	<u>\$0</u> \$0
Notes for DELAYED costs	Estimated cos				dent No. 353427. nal Date is the dat	The Date Required e of compliance.	is the date the
Avoided Costs	ANNU	ALIZE avoided co	osts before er	tering	item (except for	one-time avoide	d costs)
Disposal				0.00	\$0	\$0	\$0
Personnel				0.00	\$0	\$0	\$0
Inspection/Reporting/Sampling				0.00	\$0	\$0	\$0
Supplies/Equipment				0.00	\$0	\$0	\$0
Financial Assurance				0.00	\$0	\$0	\$0
ONE-TIME avoided costs				0.00	\$0	\$0	\$0
Other (as needed)				0.00	\$0	\$0	\$0
Notes for AVOIDED costs							
	<u> </u>						



Economic Benefit (EB) for this violation	Statutory Limit Test
Estimated EB Amount	\$11 Violation Final Penalty Total \$442
	This violation Final Assessed Penalty (adjusted for limits) \$442

		conomic	Benefit	Woi	rksheet		
Respondent	Mitsubishi Che	mical America, In	c. f/k/a Lucite I	nternati	ional, Inc.		
Case ID No.							
eg. Ent. Reference No.							
Media						_	Years of
Violation No.						Percent Interest	Depreciation
						5.0	1
	Item Cost	<b>Date Required</b>	<b>Final Date</b>	Yrs	<b>Interest Saved</b>	<b>Costs Saved</b>	EB Amount
Item Description							
Delayed Costs							
Equipment		l I		0.00	\$0	\$0	\$0
Buildings				0.00	\$0	\$0	<u>\$0</u>
Other (as needed)				0.00	\$0	\$0	\$0
Engineering/Construction				0.00	\$0	\$0	\$0
Land				0.00	\$0	n/a	\$0
Record Keeping System				0.00	\$0	n/a	\$0
Training/Sampling				0.00	\$0	n/a	\$0
Remediation/Disposal				0.00	\$0	n/a	\$0
Permit Costs				0.00	\$0	n/a	\$0
Other (as needed)	\$250	40.4 0004					
	Estimated co					n/a	-
Notes for DELAYED costs	Estimated co No. 35342	ost to provide the 7. The Date Requ	correct estimate ired is the date	ed total the fina complia	quantity for SO2 t al record was due a ance.	hat was released du and the Final Date is	uring Incident s the date of
Notes for DELAYED costs Avoided Costs	Estimated co No. 35342	ost to provide the 7. The Date Requ	correct estimatori ired is the date	ed total the fina complia	quantity for SO2 t al record was due a ance. item (except for	that was released dual the Final Date is <b>one-time avoide</b>	uring Incident s the date of d costs)
Notes for DELAYED costs Avoided Costs Disposal	Estimated co No. 35342	ost to provide the 7. The Date Requ	correct estimatori ired is the date	ed total the fina complia <b>tering</b> 0.00	quantity for SO2 t al record was due a ance. item (except for \$0	that was released dual the Final Date is ond the Final Date is one-time avoide \$0	uring Incident s the date of d costs) \$0
Notes for DELAYED costs Avoided Costs Disposal Personnel	Estimated co No. 35342	ost to provide the 7. The Date Requ	correct estimatori ired is the date	ed total the fina complia tering 0.00	quantity for SO2 t al record was due a ance. item (except for \$0 \$0	that was released do and the Final Date is <b>one-time avoide</b> \$0 \$0	uring Incident s the date of d costs) \$0 \$0
Notes for DELAYED costs Avoided Costs Disposal Personnel Inspection/Reporting/Sampling	Estimated co No. 35342	ost to provide the 7. The Date Requ	correct estimatori ired is the date	ed total the fina complia tering 0.00 0.00 0.00	quantity for SO2 t al record was due a ance. item (except for \$0 \$0 \$0	hat was released do and the Final Date is one-time avoided \$0 \$0 \$0 \$0	the date of the date of <b>d costs)</b> \$0 \$0 \$0 \$0
Notes for DELAYED costs Avoided Costs Disposal Personnel Inspection/Reporting/Sampling Supplies/Equipment	Estimated co No. 35342	ost to provide the 7. The Date Requ	correct estimatori ired is the date	ed total the fina complia tering 0.00 0.00 0.00	quantity for SO2 t al record was due a ance. item (except for \$0 \$0 \$0 \$0 \$0 \$0	hat was released du and the Final Date is one-time avoided \$0 \$0 \$0 \$0 \$0 \$0	d costs) 4 costs) 5 0 50 50 50 50 50 50 50 50 50 5
Notes for DELAYED costs Avoided Costs Disposal Personnel Inspection/Reporting/Sampling Supplies/Equipment Financial Assurance	Estimated co No. 35342	ost to provide the 7. The Date Requ	correct estimatori ired is the date	ed total the fina complia 0.00 0.00 0.00 0.00 0.00	quantity for SO2 t al record was due a ance. item (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	that was released during the final Date is and the Final Date is a solution of the final Date	d costs) d costs) d costs) \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0
Notes for DELAYED costs <b>Avoided Costs</b> Disposal Personnel Inspection/Reporting/Sampling Supplies/Equipment Financial Assurance ONE-TIME avoided costs	Estimated co No. 35342	ost to provide the 7. The Date Requ	correct estimatori ired is the date	ed total the fina complia 0.00 0.00 0.00 0.00 0.00 0.00	quantity for SO2 t al record was due a ance. item (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	nd the Final Date is one-time avoided \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	d costs) d costs) d costs) \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0
Notes for DELAYED costs <b>Avoided Costs</b> Disposal Personnel Inspection/Reporting/Sampling Supplies/Equipment Financial Assurance	Estimated co No. 35342	ost to provide the 7. The Date Requ	correct estimatori ired is the date	ed total the fina complia 0.00 0.00 0.00 0.00 0.00	quantity for SO2 t al record was due a ance. item (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	that was released during the final Date is and the Final Date is a solution of the final Date	d costs) d costs) d costs) \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0
Notes for DELAYED costs <b>Avoided Costs</b> Disposal Personnel Inspection/Reporting/Sampling Supplies/Equipment Financial Assurance ONE-TIME avoided costs	Estimated co No. 35342	ost to provide the 7. The Date Requ	correct estimatori ired is the date	ed total the fina complia 0.00 0.00 0.00 0.00 0.00 0.00	quantity for SO2 t al record was due a ance. item (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	nd the Final Date is one-time avoided \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	d costs) d costs) d costs) \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0



	E	conomic	Benefit	Woi	rksheet		
Respondent Case ID No. Reg. Ent. Reference No.	62154	emical America, In	c. f/k/a Lucite I	nternati	ional, Inc.		
Media Violation No.	Air					Percent Interest	Years of Depreciation
						5.0	15
	Item Cost	<b>Date Required</b>	Final Date	Yrs	Interest Saved	Costs Saved	EB Amount
Item Description							
Delayed Costs				7			
Equipment		<u> </u>		0.00	\$0	\$0	\$0
Buildings		<u>  </u>		0.00	\$0	\$0	\$0
Other (as needed)				0.00	\$0	\$0	\$0
Engineering/Construction				0.00	\$0	\$0	\$0
Land		<u> </u>		0.00	\$0 \$0	n/a	\$0
Record Keeping System	-			0.00	<u>\$0</u> \$0	n/a n/a	<u>\$0</u> \$0
Training/Sampling Remediation/Disposal				0.00	\$0 \$0	n/a	\$0
Permit Costs				0.00	\$0	n/a	\$0
Other (as needed)		<u> </u>		0.00	\$0	n/a	\$0
Notes for DELAYED costs Avoided Costs					efit in Violation No.	4.	d costs)
Disposal			bala belore en	0.00	\$0	\$0	\$0
Personnel		<u> </u>		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

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# **Compliance History Report**

Compliance History Report for CN605866037, RN102736089, Rating Year 2021 which includes Compliance History (CH) components from September 1, 2016, through August 31, 2021.

Customer, Respondent, or Owner/Operator:	CN605866037, Mitsubishi Chemica America, Inc. f/k/a Lucite Internal		RY <b>Rating:</b> 7.58
Regulated Entity:	RN102736089, MCA BEAUMONT S		RY <b>Rating:</b> 10.43
Complexity Points: CH Group: Location: TCEQ Region:	24 05 - Chemical Manufacturing 6350 NORTH TWIN CITY HIGHWA REGION 10 - BEAUMONT	<b>Repeat Violator:</b> NO Y IN NEDERLAND, JEFFERSON COUNTY, TE	EXAS
AIR NEW SOURCE PERMIT AIR NEW SOURCE PERMIT UNDERGROUND INJECTION UNDERGROUND INJECTION WASTEWATER EPA ID TX00 POLLUTION PREVENTION P00334 INDUSTRIAL AND HAZARD REGISTRATION # (SWR) 812 INDUSTRIAL AND HAZARD TXP490355186	S ACCOUNT NUMBER JE0425E S PERMIT 2796A S REGISTRATION 103843 N CONTROL PERMIT WDW101 N CONTROL PERMIT WDW390 04669 PLANNING ID NUMBER OUS WASTE SOLID WASTE 82 OUS WASTE EPA ID	AIR OPERATING PERMITS PERMIT 19 AIR NEW SOURCE PERMITS AFS NUM AIR NEW SOURCE PERMITS PERMIT 3 UNDERGROUND INJECTION CONTRO UNDERGROUND INJECTION CONTRO WASTEWATER PERMIT WQ0000473000 AIR EMISSIONS INVENTORY ACCOUN INDUSTRIAL AND HAZARDOUS WAS TXD988088761 INDUSTRIAL AND HAZARDOUS WAS 41750	A 4824500136 B18 DL PERMIT WDW100 DL PERMIT WDW389 NT NUMBER JE0425E TE EPA ID TE OTS REQUEST
	od: September 01, 2016 to Augus	· <b>-</b>	Rating Date: 09/01/2021
-	y Report Prepared: April 05, ing Compliance History: Eni	2022 forcement	
	ted: April 05, 2017 to April 05,		
-		ation Regarding This Compliance	History.
Name: Toni Red		Phone: (512) 239-17	-
2) Has there been a (known)	nce and/or operation for the full five	e site during the compliance period?	YES NO
A. Final Orders, court ju 1 Effective Date: 0 Classification: Citation: 30 T 40 C Rqmt Prov: PER PERM Description: Fa Classification: Citation: 30 T 40 C Rqmt Prov: PER	udgments, and consent decr1/31/2018ADMINORDIModerateAC Chapter 331, SubChapter D 331FR Chapter 146, SubChapter D, PTMIT WDW100, Provision VII.B PERMMIT WDW101, Provision VII.B PERMwiled to maintain an operating wellh	<b>ees:</b> ER 2017-0763-WDW-E (1660 Order-Ag .63(c) 146, SubPT G 146.67(a) MIT IT ead injection pressure that does not excee .63(e) 146, SubPT G 146.67(c) MIT	

Description: Failed to maintain a positive pressure of 100 psig over tubing injection pressure in the tubing-casing annulus in WDW100 and WDW101 without dropping below this pressure differential for greater than 15 minutes.

Madavata	ADMINORDER	2017-1401-AIR-E	(Findings Order-Agreed Order Without Deni
on: Moderate			
30 TAC Chapter 116, Sub	Chapter B 116.11	5(b)(2)(F)	
30 TAC Chapter 116, Sub	Chapter B 116.11	5(c)	
30 TAC Chapter 122, Sub	Chapter B 122.14	3(4)	
5C THSC Chapter 382 382	2.085(b)		
	lissions at the Me	thyi Methacrylate (M	MA) Flare (MMA-PFL).
		- /	
		4(1)(E)	
General Terms and Cond	litions OP		
Special Term and Condition	on 13 OP		
: Failure to properly reco	ord Visible Emissio	ons observations at t	he SAR Unit Stack (Unit ID No.: SAR-SARST
	Chanter B 122 1/	3(1)	
		J(Z)(A)	
: Failure to report all ins	tances of deviatio	ns.	
e: 08/04/2020	ADMINORDER	2019-1436-AIR-E	(1660 Order-Agreed Order With Denial)
			, , , , , , , , , , , , , , , , , , ,
-	Chapter A 101.20	(3)	
		3(4)	
Special Condition 8 PERM	IT		
Special Condition 9 PERM	IT		
Special Terms and Condit	ions 14 OP		
: Failure to maintain SO	2 pounds per hou	r (lb/hr) limit.	
02/21/2021		2020 0791 AID E	(1660 Order Agreed Order With Depial)
	ADMINORDER	2020-0701-AIK-L	(1000 Order Agreed Order With Denial)
	Chamber 5 101 20	1(-)(1)(D)	
30 TAC Chapter 122, Sub	Chapter B 122.14	3(4)	
•			
5C THSC Chapter 382 382	2.085(b)		
•			
5C THSC Chapter 382 382 GTC and STC No. 2.F OP		r a reportable emiss	ions event no later than 24 hours after the
5C THSC Chapter 382 38: GTC and STC No. 2.F OP : Failure to submit an in	itial notification fo		ions event no later than 24 hours after the cident No. 328480 was due by January 16, 2
5C THSC Chapter 382 38: GTC and STC No. 2.F OP : Failure to submit an in f an emissions event. Sp n., but was not submitted	itial notification fo pecifically, the initi	al notification for In	
5C THSC Chapter 382 38: GTC and STC No. 2.F OP : Failure to submit an in f an emissions event. Sp	itial notification fo pecifically, the initi	al notification for In	
5C THSC Chapter 382 38: GTC and STC No. 2.F OP : Failure to submit an in f an emissions event. Sp n., but was not submitted	itial notification fo pecifically, the initi until January 20,	al notification for In 2020 at 4:04 p.m.	
5C THSC Chapter 382 38: GTC and STC No. 2.F OP : Failure to submit an in f an emissions event. Sp n., but was not submitted on: Moderate	itial notification fo pecifically, the initi until January 20, Chapter B 116.11	al notification for In 2020 at 4:04 p.m. 5(c)	
5C THSC Chapter 382 38: GTC and STC No. 2.F OP : Failure to submit an in f an emissions event. Sp n, but was not submitted on: Moderate 30 TAC Chapter 116, Sub 30 TAC Chapter 122, Sub	itial notification fo pecifically, the initi until January 20, Chapter B 116.11 Chapter B 122.14	al notification for In 2020 at 4:04 p.m. 5(c)	
5C THSC Chapter 382 38. GTC and STC No. 2.F OP : Failure to submit an in f an emissions event. Sp n., but was not submitted on: Moderate 30 TAC Chapter 116, Sub 30 TAC Chapter 122, Sub 5C THSC Chapter 382 38.	itial notification fo pecifically, the initi until January 20, Chapter B 116.11 Chapter B 122.14 2.085(b)	al notification for In 2020 at 4:04 p.m. 5(c)	
5C THSC Chapter 382 38. GTC and STC No. 2.F OP : Failure to submit an in f an emissions event. Sp n., but was not submitted on: Moderate 30 TAC Chapter 116, Sub 30 TAC Chapter 122, Sub 5C THSC Chapter 382 38. GENERAL TERMS AND CO	itial notification fo pecifically, the initi until January 20, Chapter B 116.11 Chapter B 122.14 2.085(b)	al notification for In 2020 at 4:04 p.m. 5(c)	
5C THSC Chapter 382 383 GTC and STC No. 2.F OP : Failure to submit an in f an emissions event. Sp n., but was not submitted on: Moderate 30 TAC Chapter 116, Sub 30 TAC Chapter 122, Sub 5C THSC Chapter 382 383 GENERAL TERMS AND CO GTC & STC No. 14 OP	itial notification fo pecifically, the initi until January 20, Chapter B 116.11 Chapter B 122.14 2.085(b) ONDITIONS OP	al notification for In 2020 at 4:04 p.m. 5(c)	
5C THSC Chapter 382 383 GTC and STC No. 2.F OP : Failure to submit an in f an emissions event. Sp n., but was not submitted on: Moderate 30 TAC Chapter 116, Sub 30 TAC Chapter 122, Sub 5C THSC Chapter 382 383 GENERAL TERMS AND CO GTC & STC No. 14 OP SPECIAL CONDITION 1 O	itial notification fo pecifically, the initi until January 20, Chapter B 116.11 Chapter B 122.14 2.085(b) ONDITIONS OP P	al notification for In 2020 at 4:04 p.m. 5(c)	ions event no later than 24 hours after the cident No. 328480 was due by January 16, 20
5C THSC Chapter 382 383 GTC and STC No. 2.F OP : Failure to submit an in f an emissions event. Sp h, but was not submitted on: Moderate 30 TAC Chapter 116, Sub 30 TAC Chapter 122, Sub 5C THSC Chapter 382 383 GENERAL TERMS AND CO GTC & STC No. 14 OP SPECIAL CONDITION 1 O SPECIAL CONDITION 1 PE	itial notification fo pecifically, the initi until January 20, Chapter B 116.11 Chapter B 122.14 2.085(b) ONDITIONS OP P ERMIT	al notification for In 2020 at 4:04 p.m. 5(c) 3(4)	
	30 TAC Chapter 122, Sub 5C THSC Chapter 382 383 General Terms and Cond Special Condition 1 PERM Special Term and Condition Term and Condition Term and Condition Term and Condition TAC Chapter 122, Sub 30 TAC Chapter 122, Sub 5C THSC Chapter 122, Sub 5C THSC Chapter 382 383 General Terms and Condition Term and Condition Failure to properly record Term and Condition TAC Chapter 122, Sub 30 TAC Chapter 122, Sub 30 TAC Chapter 122, Sub 5C THSC Chapter 122, Sub 5C THSC Chapter 122, Sub 5C THSC Chapter 122, Sub 5C THSC Chapter 382 383 General Terms and Cond TAC Chapter 101, Sub 30 TAC Chapter 101, Sub 30 TAC Chapter 116, Sub 30 TAC Chapter 116, Sub 30 TAC Chapter 116, Sub 30 TAC Chapter 116, Sub 30 TAC Chapter 122, Sub 5C THSC Chapter 382 383 General Terms and Cond Special Condition 1 PERM Special Condition 9 PERM Special Condition 9 PERM Special Terms and Condit Failure to maintain SO Ce: 02/21/2021 The Chapter 101, Sub	30 TAC Chapter 122, SubChapter B 122.14 5C THSC Chapter 382 382.085(b) 5 General Terms and Conditions OP 5 Special Condition 1 PERMIT 5 Special Term and Condition 14 OP 5 Failure to limit MSS emissions at the Met 5 on: Minor 30 TAC Chapter 122, SubChapter B 122.14 30 TAC Chapter 122, SubChapter B 122.14 5C THSC Chapter 382 382.085(b) 5 General Terms and Conditions OP 5 Special Term and Condition 13 OP 5 Special Term and Condition 13 OP 5 Failure to properly record Visible Emission 50 TAC Chapter 122, SubChapter B 122.14 30 TAC Chapter 122, SubChapter B 122.14 5C THSC Chapter 382 382.085(b) 5 General Terms and Conditions OP 5 Failure to report all instances of deviatio 6 Context Chapter 101, SubChapter A 101.20 30 TAC Chapter 116, SubChapter B 116.11 30 TAC Chapter 116, SubChapter B 116.11 30 TAC Chapter 116, SubChapter B 116.11 30 TAC Chapter 122, SubChapter B 122.14 5C THSC Chapter 382 382.085(b) 5 General Terms and Conditions OP 5 Failure to report all instances of deviation 6 Context 116, SubChapter B 116.11 30 TAC Chapter 116, SubChapter B 116.11 30 TAC Chapter 116, SubChapter B 116.11 30 TAC Chapter 122, SubChapter B 122.14 5C THSC Chapter 382 382.085(b) 5 General Terms and Conditions OP 5 Special Condition 1 PERMIT 5 Special Condition 1 PERMIT 5 Special Condition 9 PERMIT 5 Special Condition 9 PERMIT 5 Special Condition 9 PERMIT 5 Special Condition 9 PERMIT 5 Special Terms and Conditions 14 OP 6 Failure to maintain SO2 pounds per hour 7 Chapter 101, SubChapter F 101.20 7 Chapter 101, SubChapter F 101.20	<ul> <li>General Terms and Conditions OP</li> <li>Special Condition 1 PERMIT</li> <li>Special Term and Condition 14 OP</li> <li>Failure to limit MSS emissions at the Methyl Methacrylate (Mon: Minor</li> <li>30 TAC Chapter 122, SubChapter B 122.143(4)</li> <li>30 TAC Chapter 122, SubChapter B 122.144(1)(E)</li> <li>5C THSC Chapter 382 382.085(b)</li> <li>General Terms and Conditions OP</li> <li>Special Term and Condition 13 OP</li> <li>Failure to properly record Visible Emissions observations at toon: Minor</li> <li>30 TAC Chapter 122, SubChapter B 122.143(4)</li> <li>30 TAC Chapter 122, SubChapter B 122.143(4)</li> <li>30 TAC Chapter 122, SubChapter B 122.145(2)(A)</li> <li>5C THSC Chapter 382 382.085(b)</li> <li>General Terms and Conditions OP</li> <li>Failure to report all instances of deviations.</li> <li>e: 08/04/2020 ADMINORDER 2019-1436-AIR-E</li> <li>on: Major</li> <li>30 TAC Chapter 101, SubChapter A 101.20(3)</li> <li>30 TAC Chapter 116, SubChapter B 116.115(b)(2)(F)</li> <li>30 TAC Chapter 122, SubChapter B 116.115(b)(2)(F)</li> <li>30 TAC Chapter 122, SubChapter B 122.143(4)</li> <li>5C THSC Chapter 382 382.085(b)</li> <li>General Terms and Conditions OP</li> <li>Special Condition 1 PERMIT</li> <li>Special Condition 1 PERMIT</li> <li>Special Condition 1 PERMIT</li> <li>Special Condition 8 PERMIT</li> <li>Special Condition 9 PERMIT</li> <li>Special Condition 1 PERMIT</li> <li>Special Condition 1 PERMIT</li> <li>Special Condition 1 PERMIT</li> <li>Special Condition 1 SO2 pounds per hour (lb/hr) limit.</li> <li>e: 02/21/2021 ADMINORDER 2020-078</li></ul>

caused a leak in the pipe under the piping insulation, resulting in the release to the atmosphere. Since the Respondent did not comply with the emissions

Effective Date: 07/13/2021 ADMINORDER 2020-1063-AIR-E (1660 Order-Agreed Order With Denial) Classification: Moderate Citation: 30 TAC Chapter 101, SubChapter A 101.20(3) 30 TAC Chapter 116, SubChapter B 116.115(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 & CONDITIONS OP SPECIAL CONDITION 1 PERMIT SPECIAL CONDITION 14 OP SPECIAL CONDITION 1A OP SPECIAL CONDITION 8 PERMIT SPECIAL CONDITION 9 PERMIT Description: Failed to comply with the MAER. Specifically, the Respondent exceeded the SO2 MAER of 121.67 lbs/hr by 141.70 lbs/hr for one hour on October 14, 2019 and by 289.80 lbs/hr for one hour on October 16, 2019 for the Spent Acid

Recovery Unit Main Stack, EPN SAR-SARSTK, resulting in 431.50 lbs of unauthorized SO2 emissions.

#### B. Criminal convictions:

N/A

5

#### C. Chronic excessive emissions events:

N/A

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

The approx	ai uales of investigati	
Item 1	May 05, 2017	(1409692)
Item 2	June 28, 2017	(1422591)
Item 3	June 30, 2017	(1422366)
Item 4	July 20, 2017	(1425012)
Item 5	July 25, 2017	(1429139)
Item 6	August 16, 2017	(1443490)
Item 7	September 08, 2017	(1437229)
Item 8	September 18, 2017	(1450117)
Item 9	December 12, 2017	(1437598)
Item 10	December 14, 2017	(1454987)
Item 11	January 18, 2018	(1474502)
Item 12	March 14, 2018	(1490405)
Item 13	March 16, 2018	(1477999)
Item 14	April 06, 2018	(1478967)
Item 15	April 12, 2018	(1493642)
Item 16	May 14, 2018	(1500560)
Item 17	June 15, 2018	(1507677)
Item 18	July 16, 2018	(1503862)
Item 19	August 10, 2018	(1493539)
Item 20	August 16, 2018	(1520056)
Item 21	September 20, 2018	(1527221)
Item 22	October 15, 2018	(1533579)
Item 23	October 18, 2018	(1511114)
Item 24	November 19, 2018	(1541414)
Item 25	January 03, 2019	(1532717)
Item 26	January 18, 2019	(1559569)
Item 27	February 15, 2019	(1559567)
Item 28	February 28, 2019	(1550264)
Item 29	March 20, 2019	(1559568)
Item 30	April 09, 2019	(1554006)
Item 31	June 18, 2019	(1575642)
Item 32	June 19, 2019	(1583199)
Item 33	July 18, 2019	(1593108)
Item 34	August 15, 2019	(1599454)

Item 35	September 16, 2019	(1606359)
Item 36	September 26, 2019	(1596803)
Item 37	October 10, 2019	(1613205)
Item 38	October 17, 2019	(1603430)
Item 39	November 20, 2019	(1619019)
Item 40	November 21, 2019	(1610633)
Item 41	December 19, 2019	(1626371)
Item 42	January 09, 2020	(1622270)
Item 43	January 21, 2020	(1634012)
Item 44	January 28, 2020	(1623292)
Item 46	February 18, 2020	(1630565)
Item 47	February 20, 2020	(1640631)
Item 48	February 24, 2020	(1624987)
Item 49	March 17, 2020	(1637467)
Item 50	March 23, 2020	(1647151)
Item 51	April 28, 2020	(1645232)
Item 52	April 29, 2020	(1644186)
Item 53	May 18, 2020	(1673535)
Item 54	May 20, 2020	(1660073)
Item 55	June 22, 2020	(1666578)
Item 56	July 14, 2020	(1652986)
Item 57	July 28, 2020	(1664738)
Item 58	August 06, 2020	(1665635)
Item 59	August 07, 2020	(1665392)
Item 60	August 18, 2020	(1680310)
Item 61	August 20, 2020	(1665638)
Item 62	September 23, 2020	(1686879)
Item 63	October 15, 2020	(1693225)
Item 64	November 19, 2020	(1712368)
Item 65	November 20, 2020	(1691385)
Item 66	December 08, 2020	(1691585)
Item 67		(1712369)
Item 68	December 16, 2020	. ,
Item 69	January 07, 2021	(1685990) (1698914)
Item 70	January 11, 2021	(1098914) (1697748)
Item 70 Item 71	January 25, 2021	```
	January 27, 2021	(1698648)
Item 72	January 28, 2021	(1700857)
Item 73	January 29, 2021	(1677770)
Item 74	February 22, 2021	(1725423)
Item 75	February 26, 2021	(1703252)
Item 76	April 22, 2021	(1725425)
Item 77	May 05, 2021	(1707083)
Item 78	May 19, 2021	(1740024)
Item 79	June 18, 2021	(1735900)
Item 80	June 24, 2021	(1722689)
Item 81	July 16, 2021	(1751675)
Item 82	August 24, 2021	(1757139)
Item 83	September 17, 2021	(1762643)
Item 84	September 24, 2021	(1766219)
Item 85	October 20, 2021	(1776622)
Item 86	November 18, 2021	(1783591)
Item 87	January 20, 2022	(1798410)
Item 88	January 21, 2022	(1783405)
Item 89	February 17, 2022	(1763206)

### 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	- ,	ce of violation is not a final enforcement ac ///////////////////////////////////		
	Self Report?	YES	Classification:	Moderate
	Citation:	2D TWC Chapter 26, SubChapter A 26.		
	Description:	30 TAC Chapter 305, SubChapter F 305 Failure to meet the limit for one or mor		
	Description			
2		/04/2021 (1708610)		
	Self Report? Citation:	NO 30 TAC Chapter 101, SubChapter A 103	Classification:	Moderate
	Citation.	30 TAC Chapter 116, Subchapter A 16		
		30 TAC Chapter 122, SubChapter B 122		
		40 CFR Chapter 60, SubChapter C, PT 6 40 CFR Part 60, Subpart H 60.82(a)	50, SUDPT H 60.64(e)	
		5C THSC Chapter 382 382.085(b)		
		General Terms and Conditions OP PSDTX753 Special Condition 6 PERMI	г	
		PSDTX753 Special Condition 3B PERMI		
		Special Term and Condition 1A OP Special Terms and Conditions 14 OP		
	Description:	Failure to maintain the 3 hour (hr) rollin	ng average limit of 4	pounds Sulfur Dioxide
	Self Report?	(SO2) per ton of sulfuric acid (H2SO4) NO	(lbs/ton acid) produc Classification:	ed. Moderate
	Citation:	30 TAC Chapter 101, SubChapter A 10:		Moderate
		30 TAC Chapter 116, SubChapter B 116		
		30 TAC Chapter 116, SubChapter B 116 30 TAC Chapter 122, SubChapter B 122		
		5C THSC Chapter 382 382.085(b)		
		General Terms and Conditions OP PSDTX753, General Condition 8 PERMI	г	
		PSDTX753, Special Condition 1 PERMIT		
	Description:	Special Terms and Conditions 14 OP Failure to maintain sulfur dioxide (SO2)	) emissions below the	allowable limit
	Self Report?	NO	Classification:	Moderate
	Citation:	30 TAC Chapter 116, SubChapter B 116		
		30 TAC Chapter 122, SubChapter B 122 5C THSC Chapter 382 382.085(b)	2.143(4)	
		General Terms and Conditions OP		
		Special Condition 6A PERMIT Special Terms and Conditions 14 OP		
	Description:	Failure to maintain hourly average limit		
		oxides (NOx) and 100 ppm (dry basis, Monoxide (CO) for Boiler No. 7 (Emissio		
	Self Report?	NO	Classification:	Moderate
	Citation:	30 TAC Chapter 116, SubChapter B 116		
		30 TAC Chapter 122, SubChapter B 122 5C THSC Chapter 382 382.085(b)	2.143(4)	
		General Terms and Conditions OP		
		Special Condition 11A PERMIT Special Terms and Conditions 14 OP		
	Description:	Failure to maintain daily average limits		
		oxides (NOx) and 100 ppm (dry basis, Monoxide (CO) for Boiler No. 7 (Emissio		
	Self Report?	NO	Classification:	Moderate
	Citation:	30 TAC Chapter 122, SubChapter B 122		
		30 TAC Chapter 122, SubChapter B 122 30 TAC Chapter 122, SubChapter B 122		
		5C THSC Chapter 382 382.085(b)		
	Description:	General Terms and Conditions OP Failure to report all instances of deviati	ons	
	Description.			
3		/30/2021 (1790615)		<b>N</b> 1 .
	Self Report? Citation:	YES 2D TWC Chapter 26, SubChapter A 26.	Classification:	Moderate
	citation.	30 TAC Chapter 305, SubChapter F 305		
	Description:	Failure to meet the limit for one or mor	e permit parameter	

03/25/2022 (1795790) Date: Self Report? NO Classification: Moderate Citation: 30 TAC Chapter 101, SubChapter A 101.20(3) 30 TAC Chapter 116, SubChapter B 116.115(c) 30 TAC Chapter 122, SubChapter B 122.143(4) 40 CFR Chapter 60, SubChapter C, PT 60, SubPT H 60.84(e) 40 CFR Part 60, Subpart H 60.82(a) 5C THSC Chapter 382 382.085(b) General Terms and Conditions OP PSDTX753 Special Condition 3B PERMIT PSDTX753, Special Condition 6 PERMIT Special Term and Condition 1A OP Special Terms and Conditions 14 OP Description: Failure to maintain the 3 hour (hr) rolling average limit of 4 pounds Sulfur Dioxide (SO2) per ton of sulfuric acid (H2SO4) (lbs/ton acid) produced. F. Environmental audits:

#### Notice of Intent Date: 03/21/2018 (1479242) Disclosure Date: 10/26/2018 Viol. Classification: Minor Citation: 40 CFR Chapter 262, SubChapter I, PT 262, SubPT M 262.260(a) 40 CFR Chapter 265, SubChapter I, PT 265, SubPT D 265.51(a) 30 TAC Chapter 335, SubChapter E 335.112(a)(3) Description: Failed to have a complete and updated hazardous waste contingency plan. Viol. Classification: Minor Citation: 40 CFR Chapter 112, SubChapter D, PT 112 112.3 30 TAC Chapter 324, SubChapter A 324.15 Description: Failed to maintain an up to date spill prevention control and countermeasures plan. Viol. Classification: Minor Citation: 30 TAC Chapter 335, SubChapter A 335.9(a)(1)(B) Description: Failed to maintain a record of the location of all hazardous waste accumulation areas. Viol. Classification: Minor Citation: 30 TAC Chapter 331, SubChapter D 331.64(g) Description: Failed to conduct quarterly corrosion monitoring. Notice of Intent Date: 06/19/2019 (1577680) Disclosure Date: 06/18/2020 Viol. Classification: Moderate Citation: 30 TAC Chapter 116, SubChapter B 116.116(b)(1)(C) Rgmt Prov: PERMIT GC 1 Description: Failure to abide by representations in the permit application without first obtaining a permit amendment. The particulate matter sample calculation submitted in the permit application omitted the 8.34 lbs/gal conversion factor for water Notice of Intent Date: 08/03/2020 (1673183) No DOV Associated Notice of Intent Date: 03/31/2021 (1722399) Disclosure Date: 11/18/2021 Viol. Classification: Minor 30 TAC Chapter 101, SubChapter A 101.20(3) 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) Rgmt Prov: PERMIT MAERT

- Description: The Plant exceeded the SO2 limit of the SAR stack during 196 additional and previously unknown hourly periods, which are identified in green on the attached Table A in the column titled "Adjusted Emissions ('calc 13')".
- G. Type of environmental management systems (EMSs): N/A

- H. Voluntary on-site compliance assessment dates:  $_{\mbox{N/A}}$
- I. Participation in a voluntary pollution reduction program: \$N/A\$
- J. Early compliance: N/A

## Sites Outside of Texas:

N/A

## TEXAS COMMISSION ON ENVIRONMENTAL QUALITY



IN THE MATTER OF AN ENFORCEMENT ACTION CONCERNING MITSUBISHI CHEMICAL AMERICA, INC. F/K/A LUCITE INTERNATIONAL, INC. RN102736089 **BEFORE THE** 

TEXAS COMMISSION ON

ENVIRONMENTAL QUALITY

## AGREED ORDER DOCKET NO. 2022-0397-AIR-E

## I. JURISDICTION AND STIPULATIONS

On \_\_\_\_\_\_, the Texas Commission on Environmental Quality ("the Commission" or "TCEQ") considered this agreement of the parties, resolving an enforcement action regarding Mitsubishi Chemical America, Inc. f/k/a Lucite International, Inc. (the "Respondent") under the authority of TEX. HEALTH & SAFETY CODE ch. 382 and TEX. WATER CODE ch. 7. The Executive Director of the TCEQ, through the Enforcement Division, and the Respondent together stipulate that:

- 1. The Respondent owns and operated a chemical manufacturing plant located at 6350 North Twin City Highway in Nederland, Jefferson County, Texas (the "Plant"). The Plant consists or consisted of one or more sources as defined in Tex. HEALTH & SAFETY CODE § 382.003(12).
- 2. The Executive Director and the Respondent agree that the TCEQ has jurisdiction to enter this Order pursuant to Tex. WATER CODE §§ 7.002, 7.051, and 7.073, and that the Respondent is subject to TCEQ's jurisdiction. The TCEQ has jurisdiction in this matter pursuant to Tex. WATER CODE § 5.013 because it alleges violations of Tex. HEALTH & SAFETY CODE ch. 382 and the rules of the TCEQ.
- 3. The occurrence of any violation is in dispute and the entry of this Order shall not constitute an admission by the Respondent of any violation alleged in Section II ("Allegations"), nor of any statute or rule.
- 4. An administrative penalty in the amount of \$28,834 is assessed by the Commission in settlement of the violations alleged in Section II ("Allegations"). The Respondent paid \$23,068 of the penalty and \$5,776 is deferred contingent upon the Respondent's timely and satisfactory compliance with all the terms of this Order. The deferred amount shall be waived only upon full compliance with all the terms and conditions contained in this Order. If the Respondent fails to timely and satisfactorily comply with any of the terms or requirements contained in this Order, the Executive Director may demand payment of all or part of the deferred penalty amount.
- 5. The Executive Director and the Respondent agree on a settlement of the matters alleged in this enforcement action, subject to final approval in accordance with 30 Tex. ADMIN. CODE § 70.10(a). Any notice and procedures, which might otherwise be authorized or

required in this action, are waived in the interest of a more timely resolution of the matter.

- 6. The Executive Director may, without further notice or hearing, refer this matter to the Office of the Attorney General of the State of Texas ("OAG") for further enforcement proceedings if the Executive Director determines that the Respondent has not complied with one or more of the terms or conditions in this Order.
- 7. This Order represents the complete and fully-integrated agreement of the parties. The provisions of this Order are deemed severable and, if a court of competent jurisdiction or other appropriate authority deems any provision of this Order unenforceable, the remaining provisions shall be valid and enforceable.
- 8. This Order shall terminate five years from its effective date or upon compliance with all the terms and conditions set forth in this Order, whichever is later.
- 9. The Executive Director recognizes that the Respondent implemented the following corrective measures at the Plant:
  - a. By submitting the initial notification for Incident No. 353427 on March 30, 2021;
  - b. By ceasing operations by April 4, 2021; and
  - c. By providing the correct estimated total quantities for sulfur dioxide ("SO2") that were released during Incident Nos. 349843 and 353427 by February 22, 2022.

## **II. ALLEGATIONS**

During an investigation conducted at the Plant on February 22, 2022, an investigator documented that the Respondent:

- 1. Failed to report all instances of deviations, in violation of 30 TEX. ADMIN. CODE §§ 122.143(4) and 122.145(2)(A), Federal Operating Permit ("FOP") No. O1959, General Terms and Conditions ("GTC"), and TEX. HEALTH & SAFETY CODE § 382.085(b). Specifically, the deviation report for the October 4, 2020 through March 31, 2021 reporting period did not include the deviations for failing to prevent unauthorized emissions during Incident No. 353427, failing to conduct tune-ups for the North and South Process Air Preheaters, failing to maintain records of the visual observations of the Oleum Scrubber, failing to submit an accurate final record for Incident No. 349843, failing to submit a timely initial notification for Incident No. 353427, and failing to submit an accurate final record for Incident No. 353427.
- 2. Failed to maintain a record of the visual observation of the two Oleum Storage Tanks and the Oleum Scrubber at least once per shift when the scrubber is in operation, in violation of 30 TEX. ADMIN. CODE §§ 101.20(3), 116.115(c), and 122.143(4), New Source Review ("NSR") Permit Nos. 19005 and PSDTX753, Special Conditions ("SC") No. 23, FOP No. O1959, GTC and Special Terms and Conditions ("STC") No. 14, and TEX. HEALTH & SAFETY CODE § 382.085(b). Specifically, for a total of 109 days from September 1, 2019 through March 21, 2021, the Respondent did not maintain records of the visual observations that were conducted to ensure the Oleum Scrubber was operating properly.

Mitsubishi Chemical America, Inc. f/k/a Lucite International, Inc. DOCKET NO. 2022-0397-AIR-E Page 3

- 3. Failed to identify all of the required information on the final record for a reportable emissions event, in violation of 30 TEX. ADMIN. CODE §§ 101.201(b)(1)(H) and 122.143(4), FOP No. 01959, GTC and STC No. 2.F, and TEX. HEALTH & SAFETY CODE § 382.085(b). Specifically, on February 14, 2021, the Respondent identified 598.30 pounds ("lbs") of SO2 on the final record for Incident No. 349843, but after further review and investigation, the Respondent indicated that the total quantity was 1,406.30 lbs of SO2.
- 4. Failed to prevent unauthorized emissions, in violation of 30 TEX. ADMIN. CODE §§ 101.20(3), 116.115(c), and 122.143(4), NSR Permit Nos. 19005 and PSDTX753, SC No. 1, FOP No. O1959, GTC and STC No. 14, and TEX. HEALTH & SAFETY CODE § 382.085(b). Specifically, the Respondent released 668.16 lbs of SO2 from the Sulfuric Acid Recovery Unit Main Stack, EPN SAR-SARSTK, during an emissions event (Incident No. 349843) that began on February 1, 2021 and lasted six hours and four minutes. The emissions event occurred when the converter temperatures cooled during the startup of the Sulfuric Acid Recovery North Train that led to the shutdown of the Plant, resulting in the release to the atmosphere. Since the emissions event was not caused by a sudden unavoidable breakdown of equipment or process beyond the control of the owner or operator and could have been avoided by better design and/or operational and maintenance practices, the Respondent is precluded from asserting an affirmative defense under 30 TEX. ADMIN. CODE § 101.222.
- 5. Failed to submit an initial notification for a reportable emissions event no later than 24 hours after the discovery of an emissions event, in violation of 30 TEX. ADMIN. CODE §§ 101.201(a)(1)(B) and 122.143(4), FOP No. 01959, GTC and STC No. 2.F, and TEX. HEALTH & SAFETY CODE § 382.085(b). Specifically, the initial notification for Incident No. 353427 was due by March 30, 2021 at 7:00 a.m., but was not submitted until March 30, 2021 at 10:58 a.m.
- 6. Failed to identify all of the required information on the final record for a reportable emissions event, in violation of 30 Tex. ADMIN. CODE §§ 101.201(b)(1)(H) and 122.143(4), FOP No. 01959, GTC and STC No. 2.F, and Tex. HEALTH & SAFETY CODE § 382.085(b). Specifically, on April 12, 2021, the Respondent identified 1,429.00 lbs SO2 on the final record for Incident No. 353427, but after further review and investigation, the Respondent indicated that the total quantity was 3,740.40 lbs of SO2.
- 7. Failed to prevent unauthorized emissions, in violation of 30 TEX. ADMIN. CODE §§ 101.20(3), 116.115(c), and 122.143(4), NSR Permit Nos. 19005 and PSDTX753, SC No. 1, FOP No. 01959, GTC and STC No. 14, and TEX. HEALTH & SAFETY CODE § 382.085(b). Specifically, the Respondent released 1,428.67 lbs of SO2 from the Sulfuric Acid Recovery Unit Main Stack, EPN SAR-SARSTK, during an emissions event (Incident No. 353427) that began on March 29, 2021 and lasted 19 hours. The emissions event occurred due to a calculation error in the Distributive Control System, resulting in the release to the atmosphere. Since the Respondent did not comply with the emissions event reporting requirements, the emissions event was not caused by a sudden unavoidable breakdown of equipment or process beyond the control of the owner or operator, and the emissions event could have been avoided by better design and/or better operational and maintenance practices, the Respondent is precluded from asserting an affirmative defense under 30 TEX. ADMIN. CODE § 101.222.

## **III. DENIALS**

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

## **IV. ORDERING PROVISIONS**

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

1. The Respondent is assessed a penalty as set forth in Section I, Paragraph No. 4. The payment of this penalty and the Respondent's compliance with all of the requirements set forth in this Order resolve only the allegations in Section II. The Commission shall not be constrained in any manner from requiring corrective action or penalties for violations which are not raised here. Penalty payments shall be made payable to "TCEQ" and shall be sent with the notation "Re: Mitsubishi Chemical America, Inc. f/k/a Lucite International, Inc., Docket No. 2022-0397-AIR-E" to:

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

- 2. The Respondent shall undertake the following technical requirements at the Plant:
  - a. Within 30 days after the effective date of this Order, submit a revised deviation report for the October 4, 2020 through March 31, 2021 reporting period that includes the deviations for failing to prevent unauthorized emissions during Incident No. 353427, failing to conduct tune-ups for the North and South Process Air Preheaters, failing to maintain records of the visual observations of the Oleum Scrubber, failing to submit an accurate final record for Incident No. 353427, and failing to submit an accurate final record for Incident No. 353427, and failing to submit an accurate final record for Incident No. 353427, and failing to submit an accurate final record for Incident No. 353427, and failing to submit an accurate final record for Incident No. 353427, and failing to submit an accurate final record for Incident No. 353427, and failing to submit an accurate final record for Incident No. 353427.
  - b. Within 45 days after the effective date of this Order, submit written certification, and include detailed supporting documentation including photographs, receipts, and/or other records to demonstrate compliance with Ordering Provision No.
     2.a. The certification shall be signed by the Respondent and shall include the following certification language:

"I certify under penalty of law that I have personally examined and am familiar with the information submitted and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fines and imprisonment for knowing violations." Mitsubishi Chemical America, Inc. f/k/a Lucite International, Inc. DOCKET NO. 2022-0397-AIR-E Page 5

The certification shall be submitted to:

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

with a copy to:

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

- 3. All relief not expressly granted in this Order is denied.
- 4. The duties and provisions imposed by this Order shall apply to and be binding upon the Respondent.
- 5. If the Respondent fails to comply with any of the Ordering Provisions in this Order within the prescribed schedules, and that failure is caused solely by an act of God, war, strike, riot, or other catastrophe, the Respondent's failure to comply is not a violation of this Order. The Respondent shall have the burden of establishing to the Executive Director's satisfaction that such an event has occurred. The Respondent shall notify the Executive Director within seven days after the Respondent becomes aware of a delaying event and shall take all reasonable measures to mitigate and minimize any delay.
- 6. The Executive Director may grant an extension of any deadline in this Order or in any plan, report, or other document submitted pursuant to this Order, upon a written and substantiated showing of good cause. All requests for extensions by the Respondent shall be made in writing to the Executive Director. Extensions are not effective until the Respondent receives written approval from the Executive Director. The determination of what constitutes good cause rests solely with the Executive Director. Extension requests shall be sent to the Order Compliance Team at the address listed above.
- 7. This Order, issued by the Commission, shall not be admissible against the Respondent in a civil proceeding, unless the proceeding is brought by the OAG to: (1) enforce the terms of this Order; or (2) pursue violations of a statute within the Commission's jurisdiction, or of a rule adopted or an order or permit issued by the Commission under such a statute.
- 8. This Order may be executed in separate and multiple counterparts, which together shall constitute a single instrument. Any page of this Order may be copied, scanned, digitized, converted to electronic portable document format ("pdf"), or otherwise reproduced and may be transmitted by digital or electronic transmission, including but not limited to facsimile transmission and electronic mail. Any signature affixed to this Order shall constitute an original signature for all purposes and may be used, filed, substituted, or issued for any purpose for which an original signature could be used. The term "signature" shall include manual signatures and true and accurate reproductions of manual signatures created, executed, endorsed, adopted, or authorized

by the person or persons to whom the signatures are attributable. Signatures may be copied or reproduced digitally, electronically, by photocopying, engraving, imprinting, lithographing, electronic mail, facsimile transmission, stamping, or any other means or process which the Executive Director deems acceptable. In this paragraph exclusively, the terms: electronic transmission, owner, person, writing, and written, shall have the meanings assigned to them under TEX. BUS. ORG. CODE § 1.002.

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

Mitsubishi Chemical America, Inc. f/k/a Lucite International, Inc. DOCKET NO. 2022-0397-AIR-E Page 7

#### SIGNATURE PAGE

#### TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

For the Commission

Date

For the Executive Director

\_\_\_\_<u>11/7/2022</u> 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 NW

Date TERIONAL OPALSTISMS DIRECTOR

Name (Printed or typed) Title Authorized Representative of Mitsubishi Chemical America, Inc. f/k/a Lucite International, Inc.

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