

TCEQ Interoffice Memorandum

To: Mary Smith, General Counsel

Thru: *MH* Megan Hamilton, Acting Assistant Deputy Director
Enforcement Division

From: *MP* Michael Parrish, Agenda Special Assistant
Enforcement Division

Date: January 16, 2026

Subject: **Supplemental Information**
January 28, 2026 Commission Agenda
Draft Item No. 10 - OCI Beaumont LLC
Docket No. 2024-1153-AIR-E

Enclosed please find the following:

Filing with Secretary of State:

- Texas Franchise Tax Public Information Report – November 15, 2023
- Certificate of Amendment – June 27, 2025

Please do not hesitate to call Michael Parrish at (512) 239-2548 if you have any questions regarding this matter.

cc: Garrett Arthur, Public Interest Counsel
Melissa Schmidt, Public Interest Counsel
Gill Valls, Office of General Counsel
Katherine McKenzie, Agenda Coordinator, Litigation Division
Amy Settemeyer, Deputy Director, Enforcement Division
Megan Hamilton, Acting Assistant Deputy Director, Enforcement Division
Johnny Bowers, Manager, Air Section, Enforcement Division
Caleb Martin, Team Leader, Air Section, Enforcement Division
Yuliya Dunaway, Enforcement Coordinator, Air Section, Enforcement Division



05-102
(Rev.9-15/33)

Texas Franchise Tax Public Information Report

To be filed by Corporations, Limited Liability Companies (LLC), Limited Partnerships (LP),
Professional Associations (PA) and Financial Institutions

■ Tcode 13196 Franchise

■ Taxpayer number

■ Report year

3 2 0 4 3 1 7 4 2 2 9

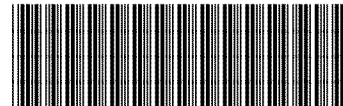
2 0 2 3

You have certain rights under Chapter 552 and 559, Government Code, to review, request and correct information we have on file about you. Contact us at 1-800-252-1381.

| | | | | | |
|--|--------------------|---------------------------------|--|--|--|
| Taxpayer name OCI BEAUMONT LLC | | | <input checked="" type="checkbox"/> Blacken circle if the mailing address has changed. | | |
| Mailing address 5470 N Twin City Hwy | | | Secretary of State (SOS) file number or Comptroller file number 0801353857 | | |
| City NEDERLAND | State TX | ZIP code plus 4 77627 | | | |

● Blacken circle if there are currently no changes from previous year; if no information is displayed, complete the applicable information in Sections A, B and C.

| |
|--|
| Principal office 5470 N Twin City Hwy, Nederland, TX, 77627 |
| Principal place of business 5470 N Twin City Hwy, Nederland, TX, 77627 |



1000000000015

You must report officer, director, member, general partner and manager information as of the date you complete this report.

Please sign below! This report must be signed to satisfy franchise tax requirements.

SECTION A Name, title and mailing address of each officer, director, member, general partner or manager.

| | | | |
|--|--------------------------------|--|--|
| Name AHMED EL HOSHY | Title PRESIDENT | Director <input type="checkbox"/> YES | Term expiration m m d d y y [][][][][][] |
| Mailing address 5470 N TWIN CITY HWY | City NEDERLAND | State TX | ZIP Code 77627 |
| Name Beshoy Guirguis | Title CFO | Director <input type="checkbox"/> YES | Term expiration m m d d y y [][][][][][] |
| Mailing address 5470 N Twin City Hwy Nederland | City NEDERLAND | State TX | ZIP Code 77627 |
| Name Ed Ray | Title Vice President | Director <input type="checkbox"/> YES | Term expiration m m d d y y [][][][][][] |
| Mailing address 5470 N Twin City Hwy Nederland | City NEDERLAND | State TX | ZIP Code 77627 |

SECTION B Enter information for each corporation, LLC, LP, PA or financial institution, if any, in which this entity owns an interest of 10 percent or more.

| | | | |
|--|--------------------|-------------------------------|-------------------------|
| Name of owned (subsidiary) corporation, LLC, LP, PA or financial institution | State of formation | Texas SOS file number, if any | Percentage of ownership |
| Name of owned (subsidiary) corporation, LLC, LP, PA or financial institution | State of formation | Texas SOS file number, if any | Percentage of ownership |

SECTION C Enter information for each corporation, LLC, LP, PA or financial institution, if any, that owns an interest of 10 percent or more in this entity.

| | | | |
|--|---------------------------------|--|---|
| Name of owned (parent) corporation, LLC, LP, PA or financial institution OCI PARTNERS LP | State of formation DE | Texas SOS file number, if any 0801854332 | Percentage of ownership 100.000 |
|--|---------------------------------|--|---|

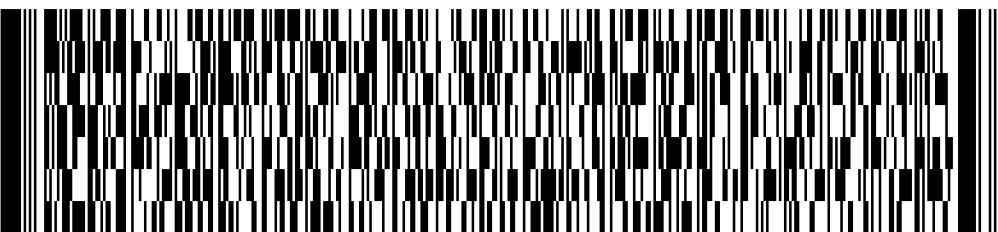
| | | | |
|--|--|--------------------|--------------------------|
| Registered agent and registered office currently on file (see instructions if you need to make changes) Agent: CORPORATION SERVICE COMPANY | You must make a filing with the Secretary of State to change registered agent, registered office or general partner information. | | |
| Office: 211 E 7TH STREET SUITE 620 | City AUSTIN | State TX | ZIP Code 78701 |

The information on this form is required by Section 171.203 of the Tax Code for each corporation, LLC, LP, PA or financial institution that files a Texas Franchise Tax Report. Use additional sheets for Sections A, B and C, if necessary. The information will be available for public inspection.

I declare that the information in this document and any attachments is true and correct to the best of my knowledge and belief, as of the date below, and that a copy of this report has been mailed to each person named in this report who is an officer, director, member, general partner or manager and who is not currently employed by this or a related corporation, LLC, LP, PA or financial institution.

| | | | |
|----------------------------------|-------|---------------------------|-------------------------------------|
| sign here BESHOY GUIRGUIS | Title | Date 11/15/2023 | Area code and phone number () - |
|----------------------------------|-------|---------------------------|-------------------------------------|

Texas Comptroller Official Use Only



| | |
|--------------------------------|----------------------------------|
| VE/DE <input type="checkbox"/> | PIR IND <input type="checkbox"/> |
|--------------------------------|----------------------------------|





05-102
(Rev.9-15/33)

Texas Franchise Tax Public Information Report

To be filed by Corporations, Limited Liability Companies (LLC), Limited Partnerships (LP),
Professional Associations (PA) and Financial Institutions

■ Tcode 13196 Franchise

■ Taxpayer number

■ Report year

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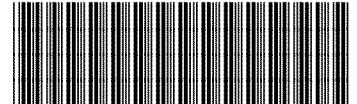
2 0 2 3

You have certain rights under Chapter 552 and 559, Government Code, to review, request and correct information we have on file about you. Contact us at 1-800-252-1381.

| | | | | | |
|--|--------------------|---------------------------------|--|--|--|
| Taxpayer name OCI BEAUMONT LLC | | | <input checked="" type="checkbox"/> Blacken circle if the mailing address has changed. | | |
| Mailing address 5470 N Twin City Hwy | | | Secretary of State (SOS) file number or Comptroller file number 0801353857 | | |
| City NEDERLAND | State TX | ZIP code plus 4 77627 | | | |

● Blacken circle if there are currently no changes from previous year; if no information is displayed, complete the applicable information in Sections A, B and C.

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| Principal office 5470 N Twin City Hwy, Nederland, TX, 77627 |
| Principal place of business 5470 N Twin City Hwy, Nederland, TX, 77627 |



1000000000015

You must report officer, director, member, general partner and manager information as of the date you complete this report.

Please sign below! This report must be signed to satisfy franchise tax requirements.

SECTION A Name, title and mailing address of each officer, director, member, general partner or manager.

| | | | |
|--|---------------------------|--|--|
| Name BOBBY OWENS | Title SECRETARY | Director <input type="checkbox"/> YES | Term expiration m m d d y y [][][][][][] |
| Mailing address 5470 N Twin City Hwy | City NEDERLAND | State TX | ZIP Code 77627 |
| Name | Title | Director <input type="checkbox"/> YES | Term expiration m m d d y y [][][][][][] |
| Mailing address | City | State | ZIP Code |
| Name | Title | Director <input type="checkbox"/> YES | Term expiration m m d d y y [][][][][][] |
| Mailing address | City | State | ZIP Code |

SECTION B Enter information for each corporation, LLC, LP, PA or financial institution, if any, in which this entity owns an interest of 10 percent or more.

| | | | |
|--|--------------------|-------------------------------|-------------------------|
| Name of owned (subsidiary) corporation, LLC, LP, PA or financial institution | State of formation | Texas SOS file number, if any | Percentage of ownership |
| Name of owned (subsidiary) corporation, LLC, LP, PA or financial institution | State of formation | Texas SOS file number, if any | Percentage of ownership |

SECTION C Enter information for each corporation, LLC, LP, PA or financial institution, if any, that owns an interest of 10 percent or more in this entity.

| | | | |
|--|--------------------|-------------------------------|-------------------------|
| Name of owned (parent) corporation, LLC, LP, PA or financial institution | State of formation | Texas SOS file number, if any | Percentage of ownership |
|--|--------------------|-------------------------------|-------------------------|

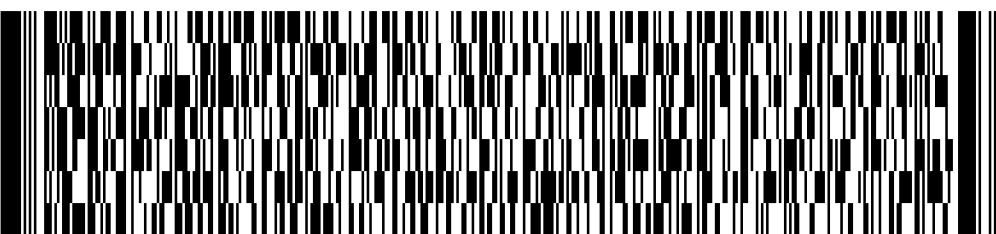
| | | | |
|---|-----------------------|--|--------------------------|
| Registered agent and registered office currently on file (see instructions if you need to make changes) | | You must make a filing with the Secretary of State to change registered agent, registered office or general partner information. | |
| Agent: CORPORATION SERVICE COMPANY | | | |
| Office: 211 E 7TH STREET SUITE 620 | City AUSTIN | State TX | ZIP Code 78701 |

The information on this form is required by Section 171.203 of the Tax Code for each corporation, LLC, LP, PA or financial institution that files a Texas Franchise Tax Report. Use additional sheets for Sections A, B and C, if necessary. The information will be available for public inspection.

I declare that the information in this document and any attachments is true and correct to the best of my knowledge and belief, as of the date below, and that a copy of this report has been mailed to each person named in this report who is an officer, director, member, general partner or manager and who is not currently employed by this or a related corporation, LLC, LP, PA or financial institution.

| | | | |
|----------------------------------|-------|---------------------------|-------------------------------------|
| sign here BESHOY GUIRGUIS | Title | Date 11/15/2023 | Area code and phone number () - |
|----------------------------------|-------|---------------------------|-------------------------------------|

Texas Comptroller Official Use Only



| | | | |
|-------|--------------------------|---------|--------------------------|
| VE/DE | <input type="checkbox"/> | PIR IND | <input type="checkbox"/> |
|-------|--------------------------|---------|--------------------------|



Form 424

Secretary of State
P.O. Box 13697
Austin, TX 78711-3697
FAX: 512/463-5709

Filing Fee: See instructions



**Certificate
of Amendment**

**Filed in the Office of the
Secretary of State of Texas
Filing #: 801353857 06/27/2025
Document #: 1494122340002
Image Generated Electronically
for Web Filing**

Entity Information

The filing entity is a: **Domestic Limited Liability Company (LLC)**

The name of the filing entity is: **OCI Beaumont LLC**

The file number issued to the filing entity by the secretary of state is: **801353857**

Amendment to Name

The amendment changes the formation document of the filing entity to change the article or provision that names the entity. The article or provision is amended to read as follows:

The name of the filing entity is:

Methanex Beaumont LLC

A letter of consent, if applicable, is attached.

Statement of Approval

The amendment has been approved in the manner required by the Texas Business Organizations Code and by the governing documents of the entity.

Effectiveness of Filing

- A. This document becomes effective when the document is filed by the secretary of state.
- B. This document becomes effective at a later date, which is not more than ninety (90) days from the date of its filing by the secretary of state. The delayed effective date is:

Execution

The undersigned signs this document subject to the penalties imposed by law for the submission of a materially false or fraudulent instrument and declares under penalty of perjury that the undersigned is authorized under the Texas Business Organizations Code to execute the filing instrument.

Date: **June 27, 2025**

**OCI Partners LP, by its general partner OCI GP LLC Mike Nims,
President of OCI GP LLC**

Signature of authorized person

Executive Summary - Enforcement Matter - Case No. 66391

OCI Beaumont LLC

RN102559291

Docket No. 2024-1153-AIR-E

Order Type:

1660 Agreed Order

Findings Order Justification:

N/A

Media:

AIR

Small Business:

No

Location(s) Where Violation(s) Occurred:

Beaumont Plant, 5470 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

Past-Due Fees: No

Other: N/A

Interested Third-Parties: None

Texas Register Publication Date: October 24, 2025

Comments Received: No

Penalty Information

Total Penalty Assessed: \$38,250

Total Paid to General Revenue: \$19,125

Total Due to General Revenue: \$0

Payment Plan: N/A

Supplemental Environmental Project ("SEP") Conditional Offset: \$19,125

Name of SEP: Southeast Texas Regional Planning Commission (Third-Party Pre-Approved)

Compliance History Classifications:

Person/CN - Satisfactory

Site/RN - Satisfactory

Major Source: Yes

Statutory Limit Adjustment: N/A

Applicable Penalty Policy: January 2021

Investigation Information

Complaint Date(s): N/A

Complaint Information: N/A

Date(s) of Investigation: June 3, 2024

Date(s) of NOE(s): July 3, 2024

**Executive Summary - Enforcement Matter - Case No. 66391
OCI Beaumont LLC
RN102559291
Docket No. 2024-1153-AIR-E**

Violation Information

Failed to comply with the maximum allowable emissions rates ("MAERs"). Specifically, the Respondent exceeded the carbon monoxide ("CO") MAER of 218.56 pounds per hour ("lbs/hr") by a range from 54.1 lbs/hr to 78.92 lbs/hr for a total of five hours on August 28, 2022, March 16, 2023, and May 29, 2023 and exceeded the nitrogen oxides ("NOx") MAER of 18.00 lbs/hr by a range from 3.91 lbs/hr to 63.81 lbs/hr for total of 27 hours on April 28, 2023, June 10 and 11, 2023, October 21, 2023, and November 2, 3, and 4, 2023 for the Reforming Furnaces and Pre-Reformer Fired Heater, Emissions Point Number ("EPN") STK-41, resulting in the unauthorized release of 335.19 lbs of CO emissions and 649.73 lbs of NOx emissions [30 TEX. ADMIN. CODE §§ 101.20(3), 116.115(b)(2)(F) and (c), and 122.143(4), New Source Review Permit Nos. 901 and PSDTX1334, Special Conditions No. 1, Federal Operating Permit No. O1645, General Terms and Conditions and Special Terms and Conditions No. 17, and TEX. HEALTH & SAFETY CODE § 382.085(b)].

Corrective Actions/Technical Requirements

Corrective Action(s) Completed:

N/A

Technical Requirements:

1. The Order will require the Respondent to implement and complete a SEP (see SEP Attachment A).
2. The Order will also require the Respondent to, within 30 days, submit written documentation to demonstrate actions that have been taken to comply with the CO and NOx hourly MAERs for EPN STK-41.

Contact Information

TCEQ Attorney: N/A

TCEQ Enforcement Coordinator: Yuliya Dunaway, Enforcement Division, Enforcement Team 2, MC R-13, (210) 403-4077; Michael Parrish, Enforcement Division, MC R-12, (512) 239-2548

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

SEP Third-Party Administrator: Southeast Texas Regional Planning Commission, 2210 Eastex Freeway, Beaumont, Texas 77703

Respondent: Zach Adamson, Plant Manager, OCI Beaumont LLC, 5470 North Twin City Highway, Nederland, Texas 77627

Respondent's Attorney: N/A



Penalty Calculation Worksheet (PCW)

Policy Revision 5 (January 28, 2021)

PCW Revision February 11, 2021

| | | | | | | |
|--------------|-----------------|-------------|------------------|-------------|----------------|--|
| DATES | Assigned | 10-Jul-2024 | Screening | 11-Jul-2024 | EPA Due | |
| | PCW | 30-Jul-2025 | | | | |

| | |
|--|------------------|
| RESPONDENT/FACILITY INFORMATION | |
| Respondent | OCI Beaumont LLC |
| Reg. Ent. Ref. No. | RN102559291 |
| Facility/Site Region | 10-Beaumont |
| Major/Minor Source | Major |

| | | | |
|--|-----------------|------------------------------|--------------------|
| CASE INFORMATION | | | |
| Enf./Case ID No. | 66391 | No. of Violations | 1 |
| Docket No. | 2024-1153-AIR-E | Order Type | 1660 |
| Media Program(s) | Air | Government/Non-Profit | No |
| Multi-Media | | Enf. Coordinator | Yuliya Dunaway |
| | | EC's Team | Enforcement Team 2 |
| Admin. Penalty \$ Limit Minimum | \$0 | Maximum | \$25,000 |

Penalty Calculation Section

| | | |
|---|-------------------|----------|
| TOTAL BASE PENALTY (Sum of violation base penalties) | Subtotal 1 | \$22,500 |
|---|-------------------|----------|

ADJUSTMENTS (+/-) TO SUBTOTAL 1

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

| | | | | |
|---------------------------|-------|------------|--------------------------------|----------|
| Compliance History | 70.0% | Adjustment | Subtotals 2, 3, & 7 | \$15,750 |
|---------------------------|-------|------------|--------------------------------|----------|

Notes: Enhancement for one NOV with the same/similar violations and four orders containing a denial of liability. Reduction for seven notices of intent to conduct an audit and four disclosures of violations.

| | | | | | |
|--------------------|----|------|-------------|-------------------|-----|
| Culpability | No | 0.0% | Enhancement | Subtotal 4 | \$0 |
|--------------------|----|------|-------------|-------------------|-----|

Notes: The Respondent does not meet the culpability criteria.

| | | |
|--|-------------------|-----|
| Good Faith Effort to Comply Total Adjustments | Subtotal 5 | \$0 |
|--|-------------------|-----|

| | | | | |
|-------------------------|------|--------------|-------------------|-----|
| Economic Benefit | 0.0% | Enhancement* | Subtotal 6 | \$0 |
|-------------------------|------|--------------|-------------------|-----|

Total EB Amounts: \$1,297
 Estimated Cost of Compliance: \$10,000
 *Capped at the Total EB \$ Amount

| | | |
|-----------------------------|-----------------------|----------|
| SUM OF SUBTOTALS 1-7 | Final Subtotal | \$38,250 |
|-----------------------------|-----------------------|----------|

| | | | |
|---|------|------------|-----|
| OTHER FACTORS AS JUSTICE MAY REQUIRE | 0.0% | Adjustment | \$0 |
|---|------|------------|-----|

Reduces or enhances the Final Subtotal by the indicated percentage.

Notes:

| | |
|-----------------------------|----------|
| Final Penalty Amount | \$38,250 |
|-----------------------------|----------|

| | | |
|-----------------------------------|-------------------------------|----------|
| STATUTORY LIMIT ADJUSTMENT | Final Assessed Penalty | \$38,250 |
|-----------------------------------|-------------------------------|----------|

| | | | | |
|-----------------|------|-----------|------------|-----|
| DEFERRAL | 0.0% | Reduction | Adjustment | \$0 |
|-----------------|------|-----------|------------|-----|

Reduces the Final Assessed Penalty by the indicated percentage.

Notes:

No deferral for orders in which the Respondent has two or more prior administrative penalty orders as set out in Tex. Water Code § 7.105(b)(2), (b)(4), and (b)(6).

| | |
|------------------------|----------|
| PAYABLE PENALTY | \$38,250 |
|------------------------|----------|

Screening Date 11-Jul-2024

Docket No. 2024-1153-AIR-E

PCW

Respondent OCI Beaumont LLC

Policy Revision 5 (January 28, 2021)

Case ID No. 66391

PCW Revision February 11, 2021

Reg. Ent. Reference No. RN102559291

Media Air

Enf. Coordinator Yuliya Dunaway

Compliance History Worksheet

>> Compliance History Site Enhancement (Subtotal 2)

| Component | Number of... | Number | Adjust. |
|-------------------------------|--|--------|---------|
| NOVs | Written notices of violation ("NOVs") with same or similar violations as those in the current enforcement action (<i>number of NOVs meeting criteria</i>) | 1 | 5% |
| | Other written NOVs | 0 | 0% |
| Orders | Any agreed final enforcement orders containing a denial of liability (<i>number of orders meeting criteria</i>) | 4 | 80% |
| | Any adjudicated final enforcement orders, agreed final enforcement orders without a denial of liability, or default orders of this state or the federal government, or any final prohibitory emergency orders issued by the commission | 0 | 0% |
| Judgments and Consent Decrees | Any non-adjudicated final court judgments or consent decrees containing a denial of liability of this state or the federal government (<i>number of judgments or consent decrees meeting criteria</i>) | 0 | 0% |
| | Any adjudicated final court judgments and default judgments, or non-adjudicated final court judgments or consent decrees without a denial of liability, of this state or the federal government | 0 | 0% |
| Convictions | Any criminal convictions of this state or the federal government (<i>number of counts</i>) | 0 | 0% |
| Emissions | Chronic excessive emissions events (<i>number of events</i>) | 0 | 0% |
| Audits | Letters notifying the executive director of an intended audit conducted under the Texas Environmental, Health, and Safety Audit Privilege Act, 74th Legislature, 1995 (<i>number of audits for which notices were submitted</i>) | 7 | -7% |
| | Disclosures of violations under the Texas Environmental, Health, and Safety Audit Privilege Act, 74th Legislature, 1995 (<i>number of audits for which violations were disclosed</i>) | 4 | -8% |
| Other | Environmental management systems in place for one year or more | No | 0% |
| | Voluntary on-site compliance assessments conducted by the executive director under a special assistance program | No | 0% |
| | Participation in a voluntary pollution reduction program | No | 0% |
| | Early compliance with, or offer of a product that meets future state or federal government environmental requirements | No | 0% |

Adjustment Percentage (Subtotal 2) 70%

>> Repeat Violator (Subtotal 3)

No

Adjustment Percentage (Subtotal 3) 0%

>> Compliance History Person Classification (Subtotal 7)

Satisfactory Performer

Adjustment Percentage (Subtotal 7) 0%

>> Compliance History Summary

Compliance History Notes

Enhancement for one NOV with the same/similar violations and four orders containing a denial of liability. Reduction for seven notices of intent to conduct an audit and four disclosures of violations.

Total Compliance History Adjustment Percentage (Subtotals 2, 3, & 7) 70%

>> Final Compliance History Adjustment

Final Adjustment Percentage *capped at 100% 70%

Screening Date 11-Jul-2024 **Docket No.** 2024-1153-AIR-E **PCW**
Respondent OCI Beaumont LLC *Policy Revision 5 (January 28, 2021)*
Case ID No. 66391 *PCW Revision February 11, 2021*
Reg. Ent. Reference No. RN102559291
Media Air
Enf. Coordinator Yuliya Dunaway

Violation Number 1
Rule Cite(s) 30 Tex. Admin. Code §§ 101.20(3), 116.115(b)(2)(F) and (c), and 122.143(4), New Source Review ("NSR") Permit Nos. 901 and PSDTX1334, Special Conditions No. 1, Federal Operating Permit No. O1645, General Terms and Conditions and Special Terms and Conditions No. 17, and Tex. Health & Safety Code § 382.085(b)
Violation Description Failed to comply with the maximum allowable emissions rates ("MAERs"). Specifically, the Respondent exceeded the carbon monoxide ("CO") MAER of 218.56 pounds per hour ("lbs/hr") by a range from 54.1 lbs/hr to 78.92 lbs/hr for a total of five hours on August 28, 2022, March 16, 2023, and May 29, 2023 and exceeded the nitrogen oxides ("NOx") MAER of 18.00 lbs/hr by a range from 3.91 lbs/hr to 63.81 lbs/hr for total of 27 hours on April 28, 2023, June 10 and 11, 2023, October 21, 2023, and November 2, 3, and 4, 2023 for the Reforming Furnaces and Pre-Reformer Fired Heater, Emissions Point Number ("EPN") STK-41, resulting in the unauthorized release of 335.19 lbs of CO emissions and 649.73 lbs of NOx emissions.

Base Penalty \$25,000

>> Environmental, Property and Human Health Matrix

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

>> Programmatic Matrix

| Matrix Notes | Falsification | Harm | | | Percent |
|--|---------------|-------|----------|-------|---------|
| | | Major | Moderate | Minor | |
| | | | | | 0.0% |
| Human health or the environment has been exposed to insignificant amounts of pollutants that do not exceed levels that are protective of human health or environmental receptors as a result of the violation. | | | | | |

Adjustment \$17,500

Violation Events

Number of Violation Events: 3 555 Number of violation days
 daily:
 weekly:
 monthly:
 quarterly: x
 semiannual:
 annual:
 single event:

Violation Base Penalty \$22,500

Three quarterly events are recommended for the instances of non-compliance that occurred on April 28, 2022, from March 16, 2023 to June 11, 2023, and from October 21, 2023 to November 4, 2023.

Good Faith Efforts to Comply 0.0% Reduction \$0

| | Before NOE/NOV | NOE/NOV to EDPRP/Settlement Offer |
|---------------|--|-----------------------------------|
| Extraordinary | | |
| Ordinary | | |
| N/A | x | |
| Notes | The Respondent does not meet the good faith criteria for this violation. | |

Violation Subtotal \$22,500

Economic Benefit (EB) for this violation **Statutory Limit Test**
 Estimated EB Amount: \$1,297 Violation Final Penalty Total: \$38,250
This violation Final Assessed Penalty (adjusted for limits) \$38,250

Economic Benefit Worksheet

Respondent OCI Beaumont LLC
Case ID No. 66391
Reg. Ent. Reference No. RN102559291
Media Air
Violation No. 1

| Percent Interest | Years of Depreciation |
|------------------|-----------------------|
| 5.0 | 15 |

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

Delayed Costs

| | | | | | | | |
|--------------------------------|---|-------------|------------|------|---------|-----|---------|
| Equipment | | | | 0.00 | \$0 | \$0 | \$0 |
| Buildings | | | | 0.00 | \$0 | \$0 | \$0 |
| Other (as needed) | | | | 0.00 | \$0 | \$0 | \$0 |
| Engineering/Construction | | | | 0.00 | \$0 | \$0 | \$0 |
| Land | | | | 0.00 | \$0 | n/a | \$0 |
| Record Keeping System | | | | 0.00 | \$0 | n/a | \$0 |
| Training/Sampling | | | | 0.00 | \$0 | n/a | \$0 |
| Remediation/Disposal | | | | 0.00 | \$0 | n/a | \$0 |
| Permit Costs | | | | 0.00 | \$0 | n/a | \$0 |
| Other (as needed) | \$10,000 | 28-Aug-2022 | 1-Apr-2025 | 2.59 | \$1,297 | n/a | \$1,297 |
| Notes for DELAYED costs | Estimated cost to submit written documentation to demonstrate actions that have been taken to comply with the CO and NOx hourly MAERs for the Reforming Furnaces and Pre-Reformer Fired Heater, EPN STK-41. The Date Required is the first date of non-compliance and the Final Date is the estimated date of compliance. | | | | | | |

Avoided Costs

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

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

Approx. Cost of Compliance \$10,000

TOTAL \$1,297



Compliance History Report

Compliance History Report for CN604138933, RN102559291, Rating Year 2024 which includes Compliance History (CH) components from September 1, 2019, through August 31, 2024.

Customer, Respondent, or Owner/Operator: CN604138933, Methanex Beaumont Llc **Classification:** SATISFACTORY **Rating:** 33.67
Regulated Entity: RN102559291, BEAUMONT PLANT **Classification:** SATISFACTORY **Rating:** 33.67
Complexity Points: 20 **Repeat Violator:** NO
CH Group: 05 - Chemical Manufacturing
Location: 5470 North Twin City Highway Nederland, Jefferson County, Texas 77627-3168
TCEQ Region: REGION 10 - BEAUMONT

ID Number(s):

AIR OPERATING PERMITS ACCOUNT NUMBER JE0343H
AIR NEW SOURCE PERMITS PERMIT 901

AIR NEW SOURCE PERMITS AFS NUM 4824500140
AIR NEW SOURCE PERMITS REGISTRATION 139348
AIR NEW SOURCE PERMITS REGISTRATION 124163
AIR NEW SOURCE PERMITS REGISTRATION 131459
AIR NEW SOURCE PERMITS REGISTRATION 167264
AIR NEW SOURCE PERMITS REGISTRATION 170053
AIR NEW SOURCE PERMITS REGISTRATION 157761
AIR NEW SOURCE PERMITS REGISTRATION 172534

INDUSTRIAL AND HAZARDOUS WASTE

NONPERMITTED ID NUMBER 89426
AIR EMISSIONS INVENTORY ACCOUNT NUMBER JE0343H
INDUSTRIAL AND HAZARDOUS WASTE EPA ID TXP490350841
INDUSTRIAL AND HAZARDOUS WASTE EPA ID TXR000080362
TAX RELIEF ID NUMBER 20130

AIR OPERATING PERMITS PERMIT 1645
AIR NEW SOURCE PERMITS ACCOUNT NUMBER JE0343H
AIR NEW SOURCE PERMITS EPA PERMIT PSDTX1334
AIR NEW SOURCE PERMITS REGISTRATION 138267
AIR NEW SOURCE PERMITS EPA PERMIT GHGPSDTX50
AIR NEW SOURCE PERMITS REGISTRATION 107868
AIR NEW SOURCE PERMITS REGISTRATION 167861
AIR NEW SOURCE PERMITS REGISTRATION 156567
AIR NEW SOURCE PERMITS REGISTRATION 169290
AIR NEW SOURCE PERMITS REGISTRATION 177223
INDUSTRIAL AND HAZARDOUS WASTE
NONPERMITTED ID NUMBER EPA ID TXR000080362
POLLUTION PREVENTION PLANNING ID NUMBER P01570
INDUSTRIAL AND HAZARDOUS WASTE EPA ID TXD988066650
INDUSTRIAL AND HAZARDOUS WASTE SOLID WASTE REGISTRATION # (SWR) 89426
TAX RELIEF ID NUMBER 18477

Compliance History Period: September 01, 2019 to August 31, 2024 **Rating Year:** 2024 **Rating Date:** 09/01/2024

Date Compliance History Report Prepared: July 30, 2025

Agency Decision Requiring Compliance History: Enforcement

Component Period Selected: July 30, 2020 to July 30, 2025

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

Name: Yuliya Dunaway

Phone: (210) 403-4077

Site and Owner/Operator History:

- 1) Has the site been in existence and/or operation for the full five year compliance period? YES
- 2) Has there been a (known) change in ownership/operator of the site during the compliance period? NO

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

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

- 1 Effective Date: 12/15/2020 ADMINORDER 2019-1777-AIR-E (1660 Order-Agreed Order With Denial)
 Classification: Moderate
 Citation: 30 TAC Chapter 101, SubChapter A 101.20(3)
 30 TAC Chapter 116, SubChapter B 116.115(c)
 30 TAC Chapter 122, SubChapter B 122.143(4)

5C THSC Chapter 382 382.085(b)
Rqmt Prov: General Terms and Conditions OP
Special Condition 1 PERMIT
Special Condition 16 OP

Description: Failure to prevent the release of unauthorized emissions to the atmosphere.

2 Effective Date: 07/07/2021 ADMINORDER 2020-0691-AIR-E (1660 Order-Agreed Order With Denial)

Classification: Moderate

Citation: 30 TAC Chapter 101, SubChapter A 101.20(3)
30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)
5C THSC Chapter 382 382.085(b)

Rqmt Prov: General Terms and Conditions OP
Special Condition 1 PERMIT
Special Condition 16 OP

Description: Failure to maintain an emission rate below the reportable quantity.

Classification: Moderate

Citation: 30 TAC Chapter 101, SubChapter A 101.20(3)
30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)
5C THSC Chapter 382 382.085(b)

Rqmt Prov: General Terms and Conditions OP
Special Condition 1 PERMIT
Special Condition 16 OP

Description: Failure to maintain an emission rate below the allowable emission limits.

3 Effective Date: 01/19/2022 ADMINORDER 2020-1141-AIR-E (1660 Order-Agreed Order With Denial)

Classification: Moderate

Citation: 30 TAC Chapter 101, SubChapter A 101.20(3)
30 TAC Chapter 122, SubChapter B 122.143(4)
5C THSC Chapter 382 382.085(b)

Rqmt Prov: General Condition IC PERMIT
General Terms and Conditions OP
Special Condition IV.A.2(g) PERMIT

Description: Failure to maintain the permitted Oxygen 2 (O2) concentration limit at 3%.

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 and Conditions OP
Special Condition 1 PERMIT
Special Term and Condition 16 OP
Special Term and Condition 1A OP

Description: Failure to maintain an emission rate below the allowable CO emission limits of 218.56 pounds per hour (lbs/hr) from EPN STK-41. [Cat. A12.i(6)]

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 and Conditions OP
Special Condition 1 PERMIT
Special Term and Condition 16 OP
Special Term and Condition 1A OP

Description: Failure to comply with the Volatile Organic Compound (VOC) MAER limit of 0.61 TPY for Methanol Flare

(EPN MEOH Flare-45) based on a 12-month rolling period.

Classification: Major

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 and Conditions OP
Special Condition 1 PERMIT
Special Term and Condition 16 OP

Description: Failed to comply with the MAERs. Specifically, the Respondent exceeded the CO MAER of 218.56 lbs/hr by an average of 37.05 lbs/hr for a total of ten hours from August 12, 2019 to May 17, 2020 and the NOx MAER of 18.00 lbs/hr by an average of 26.93 lbs/hr for a total of 65 hours from February 20, 2020 to May 22, 2020 for the Reforming Furnaces and Pre-Reformer Fired Heater, EPN STK-41, resulting in the unauthorized release of 370.52 pounds of CO emissions and 1,750.65 pounds of NOx emissions.

4 Effective Date: 08/20/2024 ADMINORDER 2021-1523-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
30 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: Special Condition 1 PERMIT
Special Term and Condition 16 OP

Description: Failure to prevent unauthorized emissions to the atmosphere during emissions event incident 359134. Specifically, the Respondent released 0.26 pound ("lb") of nitrogen oxides ("NOx"), 0.02 lb of carbon monoxide ("CO"), and 0.22 lb of anhydrous ammonia from the Ammonia Plant Flare, Emissions Point Number ("EPN") FL32 I, and released 245.59 lbs of NOx from Methanol Plant Flare, EPN 45, during an emissions event (Incident No. 359134) that occurred on May 26, 2021 and lasted 4 hours and 18 minutes.

Classification: Moderate

Citation: 30 TAC Chapter 101, SubChapter A 101.20(3)
30 TAC Chapter 116, SubChapter B 116.115
30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)
5C THSC Chapter 382 382.085(b)

Rqmt Prov: Special Condition 1 PERMIT
Special Term and Condition 16 OP

Description: Failure to prevent unauthorized emissions to the atmosphere during emissions event incident 366354. Specifically, the Respondent released 983 lbs of anhydrous ammonia from the Ammonia Storage Tank Flare, EPN TKFLARE, during an emissions event (Incident No. 366354) that occurred on September 11, 2021 and lasted one hour and 30 minutes.

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 and Conditions OP
Special Condition 1 PERMIT
Special Term and Condition 16 OP

Description: Failure to comply with the MAER. Specifically, the Respondent exceeded the CO MAER of 218.56 pounds per hour ("lbs/hr") by an average of 61.12 lbs/hr for nine hours on seven days from August 20, 2020 through June 15, 2021 for the Reforming Furnaces and Pre-Reformer Fired Heater, EPN STK-41.

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 and Conditions OP
Special Condition 1 PERMIT

Special Term and Condition 16 OP

Description: Failure to comply with the maximum allowable emissions rates ("MAERs"). Specifically, the Respondent exceeded the CO MAER of 218.56 pounds per hour ("lbs/hr") by an average of 61.12 lbs/hr for nine hours on seven

days from August 20, 2020 through June 15, 2021 and exceeded the NOx MAER of 18.0 lbs/hr by an average of 25.94 lbs/hr for eleven hours on three days from July 24, 2020 through October 19, 2020 for the Reforming Furnaces and Pre-Reformer Fired Heater, EPN STK-41.

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 and Conditions OP
Special Condition 1 PERMIT
Special Term and Condition 16 OP

Description: Failure to comply with the MAER. Specifically, the Respondent exceeded the NOx MAER of 4.27 tons per year based on a 12-month rolling period for the 12-month periods ending from November 2019 through October 2020 for the Methanol Plant Flare, EPN 45M, resulting in 1.01 tons of unauthorized NOx emissions.

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 and Conditions OP
Special Condition 1 PERMIT
Special Term and Condition 16 OP

Description: Failure to comply with the MAER. Specifically, the Respondent exceeded the NOx MAER of 4.17 tons per year based on a 12-month rolling period for the 12-month periods ending from September 2020 and from February 2021 through June 2021 for the Reformer Flare, EPN FL42M, resulting in 1.09 tons of unauthorized NOx emissions.

Classification: Moderate

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

Rqmt Prov: General Terms and Conditions OP

Description: Failure to report all deviations. Specifically, the deviation report for the January 1, 2020 through June 30, 2020 reporting period did not include the deviation for failing to comply with the NOx MAER based on a 12-month rolling period for the Reformer Flare, EPN FL42M.

Classification: Moderate

Citation: 30 TAC Chapter 101, SubChapter F 101.201(a)(1)(B)
30 TAC Chapter 122, SubChapter B 122.143(4)
5C THSC Chapter 382 382.085(b)

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

Description: Failure to submit an initial notification for a reportable emissions event no later than 24 hours after the discovery of an emissions event. Specifically, the Respondent had an emissions event that occurred on February 26, 2021 and lasted 28 minutes, but the initial notification was not submitted.

Classification: Moderate

Citation: 30 TAC Chapter 101, SubChapter A 101.20(3)
30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)
5C THSC Chapter 382 382.085(b)

Rqmt Prov: General Terms and Conditions OP
Special Condition 1 PERMIT
Special Term and Condition 16 OP

Description: Failure to prevent unauthorized emissions to the atmosphere during an emissions event. Specifically, the Respondent released 4,797.98 lbs of methanol, 4,539.05 lbs of methyl formate, and 249.86 lbs of volatile organic compounds as fugitive emissions, during an emissions event that occurred on February 26, 2021 and lasted 28 minutes.

Classification: Moderate

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

30 TAC Chapter 122, SubChapter B 122.143(4)
5C THSC Chapter 382 382.085(b)

Rqmt Prov: Special Condition 1 PERMIT
Special Term and Condition 16 OP

Description: Failure to prevent unauthorized emissions to the atmosphere during emissions event incident 372340. Specifically, the Respondent released 329.98 lbs of anhydrous ammonia from the Fugitives-Ammonia Plant, EPN AFUG322, during an emissions event (Incident No. 372340) that occurred on January 4, 2022 and lasted six minutes..

B. Criminal convictions:

N/A

C. Chronic excessive emissions events:

N/A

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

| | | |
|---------|--------------------|-----------|
| Item 1 | August 31, 2020 | (1672043) |
| Item 2 | January 05, 2021 | (1679077) |
| Item 3 | January 07, 2021 | (1678262) |
| Item 4 | March 11, 2021 | (1702659) |
| Item 5 | April 09, 2021 | (1702415) |
| Item 6 | June 07, 2021 | (1722224) |
| Item 7 | August 03, 2021 | (1749418) |
| Item 8 | March 28, 2022 | (1804298) |
| Item 9 | May 23, 2022 | (1804678) |
| Item 10 | August 30, 2022 | (1826333) |
| Item 11 | October 31, 2022 | (1853803) |
| Item 12 | July 21, 2023 | (1916630) |
| Item 13 | November 30, 2023 | (1931472) |
| Item 14 | August 12, 2024 | (2003316) |
| Item 15 | September 19, 2024 | (2014916) |
| Item 16 | October 03, 2024 | (2014928) |

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

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

- 1 Date: 06/27/2025 (2070743)
 - Self Report? NO Classification: Moderate
 - Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)
5C THSC Chapter 382 382.085(b)
General Terms and Conditions OP
Special Condition 13(A)(2) PERMIT
Special Condition 17 OP
 - Description: Failure to continuously monitor flow and data in the Crude Methanol Tank Scrubber.
 - Self Report? NO Classification: Moderate
 - Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)
5C THSC Chapter 382 382.085(b)
General Terms and Conditions OP
Special Condition 17 OP
Special Condition 20(H) PERMIT
Special Condition 20(I) PERMIT
 - Description: Failure to maintain record for the first attempt and final attempt of repair after a leak was discovered.
 - Self Report? NO Classification: Moderate
 - Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)
5C THSC Chapter 382 382.085(b)
General Terms and Conditions OP
Special Condition 11 OP
Special Condition 14(B) PERMIT
 - Description: Special Condition 14(D) PERMIT
Failure to maintain minimum liquid flow to the scrubber (EPN: 35) and minimum freshwater addition rate to the scrubber.

F. Environmental audits:

Notice of Intent Date: 04/14/2021 (1710754)

Disclosure Date: 07/29/2021

Viol. Minor

Classification:

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

Description: Visible emissions observation records are incomplete or not available.

Viol. Minor

Classification:

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

Rqmt Prov: OP ST&C 14

Description: Monthly HON Car Seal valve inspections were missed.

Disclosure Date: 01/27/2022

Viol. Minor

Classification:

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

Description: The CO2 Stripper Vent Vent was not routed to process as planned. The source is not authorized adequately.

Disclosure Date: 03/29/2022

Viol. Minor

Classification:

Citation: 30 TAC Chapter 101, SubChapter A 101.10

Description: Failed to accurately report emissions on the Annual Emission Inventory Report.

Notice of Intent Date: 05/26/2022 (1825835)

No DOV Associated

Notice of Intent Date: 07/28/2022 (1841161)

No DOV Associated

Notice of Intent Date: 12/19/2022 (1866871)

Disclosure Date: 01/27/2023

Viol. Moderate

Classification:

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

Rqmt Prov: PERMIT PBR Registration

Description: Failure to ensure that no more than one truck per hour is loaded.

Notice of Intent Date: 04/20/2023 (1910871)

Disclosure Date: 07/27/2023

Viol. Moderate

Classification:

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

Rqmt Prov: PERMIT SC 7

Description: Failure to ensure the Ammonia Storage Tank (EPN:TKFLARE and ATK2FLR) inline flowmeters are factory calibrated during the annual PM.

Notice of Intent Date: 04/20/2023 (1923841)

No DOV Associated

Notice of Intent Date: 09/21/2023 (1936728)

Disclosure Date: 01/29/2024

Viol. Moderate

Classification:

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

Description: Failure to ensure that the Appendix F procedure is adequate to support spare parts list.

G. Type of environmental management systems (EMSs):

N/A

H. Voluntary on-site compliance assessment dates:

N/A

I. Participation in a voluntary pollution reduction program:

N/A

J. Early compliance:

N/A

Sites Outside of Texas:

N/A

TEXAS COMMISSION ON ENVIRONMENTAL QUALITY



IN THE MATTER OF AN
ENFORCEMENT ACTION
CONCERNING
OCI BEAUMONT LLC
RN102559291

§ BEFORE THE
§ TEXAS COMMISSION ON
§ ENVIRONMENTAL QUALITY

AGREED ORDER DOCKET NO. 2024-1153-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 OCI Beaumont LLC (the "Respondent") under the authority of TEX. HEALTH & SAFETY CODE ch. 382 AND TEX. WATER CODE ch. 7. The Executive Director of the TCEQ, through the Enforcement Division, and the Respondent together stipulate that:

1. The Respondent owns and operates a chemical manufacturing plant located at 5470 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 \$38,250 is assessed by the Commission in settlement of the violations alleged in Section II ("Allegations"). The Respondent paid \$19,125 of the penalty. Pursuant to TEX. WATER CODE § 7.067, \$19,125 of the penalty shall be conditionally offset by the Respondent's timely and satisfactory completion of a Supplemental Environmental Project ("SEP") as defined in the attached SEP Agreement ("Attachment A", incorporated herein by reference). The Respondent's obligation to pay the conditionally offset portion of the penalty shall be discharged upon full compliance with all the terms and conditions of this Order, which includes the timely and satisfactory completion of all provisions of the SEP Agreement, as determined by the Executive Director.
5. The Executive Director and the Respondent agree on a settlement of the matters alleged in this enforcement action, subject to final approval in accordance with 30 TEX. ADMIN. CODE § 70.10(a). Any notice and procedures, which might otherwise be authorized or

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

6. The Executive Director may, without further notice or hearing, refer this matter to the Office of the Attorney General of the State of Texas ("OAG") for further enforcement proceedings if the Executive Director determines that the Respondent has not complied with one or more of the terms or conditions in this Order.
7. This Order represents the complete and fully integrated agreement of the parties. The provisions of this Order are deemed severable and, if a court of competent jurisdiction or other appropriate authority deems any provision of this Order unenforceable, the remaining provisions shall be valid and enforceable.
8. This Order shall terminate five years from its effective date or upon compliance with all the terms and conditions set forth in this Order, whichever is later.

II. ALLEGATIONS

During a record review for the Plant conducted on June 3, 2024, an investigator documented that the Respondent failed to comply with the maximum allowable emissions rates ("MAERs"), in violation of 30 TEX. ADMIN. CODE §§ 101.20(3), 116.115(b)(2)(F) and (c), and 122.143(4), New Source Review ("NSR") Permit Nos. 901 and PSDTX1334, Special Conditions No. 1, Federal Operating Permit No. O1645, General Terms and Conditions and Special Terms and Conditions No. 17, and TEX. HEALTH & SAFETY CODE § 382.085(b). Specifically, the Respondent exceeded the carbon monoxide ("CO") MAER of 218.56 pounds per hour ("lbs/hr") by a range from 54.1 lbs/hr to 78.92 lbs/hr for a total of five hours on August 28, 2022, March 16, 2023, and May 29, 2023 and exceeded the nitrogen oxides ("NOx") MAER of 18.00 lbs/hr by a range from 3.91 lbs/hr to 63.81 lbs/hr for total of 27 hours on April 28, 2023, June 10 and 11, 2023, October 21, 2023, and November 2, 3, and 4, 2023 for the Reforming Furnaces and Pre-Reformer Fired Heater, Emissions Point Number ("EPN") STK-41, resulting in the unauthorized release of 335.19 lbs of CO emissions and 649.73 lbs of NOx emissions.

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: OCI Beaumont LLC, Docket No. 2024-1153-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 implement and complete the SEP as set forth in Section I, Paragraph No. 4. The amount of \$19,125 of the assessed penalty is conditionally offset based on the Respondent's implementation and completion of the SEP pursuant to the terms of the SEP Agreement, as defined in Attachment A. Penalty payments for any portion of the SEP deemed by the Executive Director as not complete shall be paid within 30 days after the date the Executive Director demands payment.
3. The Respondent shall undertake the following technical requirements:

- a. Within 30 days after the effective date of this Order, submit written documentation to demonstrate actions that have been taken to comply with the CO and NOx hourly MAERs for EPN STK-41, in accordance with NSR Permit Nos. 901 and PSDTX1334.
- b. The documentation referenced in Ordering Provision No. 3.a shall include written certification, and detailed supporting documentation including photographs, receipts, and/or other records to demonstrate compliance. The certification shall be signed by the Respondent and shall include the following certification language:

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

The certification shall be submitted to:

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

with a copy to:

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

4. All relief not expressly granted in this Order is denied.

5. The duties and provisions imposed by this Order shall apply to and be binding upon the Respondent. The Respondent is ordered to give notice of this Order to personnel who maintain day-to-day control over the Plant operations referenced in this Order.
6. The Executive Director may grant an extension of any deadline in this Order or in any plan, report, or other document submitted pursuant to this Order, upon a written and substantiated showing of good cause. All requests for extensions by the Respondent shall be made in writing to the Executive Director. Extensions are not effective until the Respondent receives written approval from the Executive Director. The determination of what constitutes good cause rests solely with the Executive Director. Extension requests shall be sent to the Enforcement Division at the address listed above.
7. This Order, issued by the Commission, shall not be admissible against the Respondent in a civil proceeding, unless the proceeding is brought by the OAG to: (1) enforce the terms of this Order; or (2) pursue violations of a statute within the Commission's jurisdiction, or of a rule adopted or an order or permit issued by the Commission under such a statute.
8. This Order may be executed in separate and multiple counterparts, which together shall constitute a single instrument. Any page of this Order may be copied, scanned, digitized, converted to electronic portable document format ("pdf"), or otherwise reproduced and may be transmitted by digital or electronic transmission, including but not limited to facsimile transmission and electronic mail. Any signature affixed to this Order shall constitute an original signature for all purposes and may be used, filed, substituted, or issued for any purpose for which an original signature could be used. The term "signature" shall include manual signatures and true and accurate reproductions of manual signatures created, executed, endorsed, adopted, or authorized by the person or persons to whom the signatures are attributable. Signatures may be copied or reproduced digitally, electronically, by photocopying, engraving, imprinting, lithographing, electronic mail, facsimile transmission, stamping, or any other means or process which the Executive Director deems acceptable. In this paragraph exclusively, the terms: electronic transmission, owner, person, writing, and written, shall have the meanings assigned to them under TEX. BUS. ORG. CODE § 1.002.
9. The effective date of this Order is the date it is signed by the Commission. A copy of this fully executed Order shall be provided to each of the parties.

SIGNATURE PAGE

TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

For the Commission
Krista Mello-Jurack

Date
12/13/2025

For the Executive Director
Date

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

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

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

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

Zach Adamson

Signature
Date
9/17/2025

Zach Adamson

Name (Printed or typed)
Authorized Representative of
OCI Beaumont LLC
Title
Plant Manager

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

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

Attachment A

Docket Number: 2024-1153-AIR-E

SUPPLEMENTAL ENVIRONMENTAL PROJECT

| | |
|-----------------------------------|---|
| Respondent: | OCI Beaumont LLC |
| Payable Penalty Amount: | \$38,250 |
| SEP Offset Amount: | \$19,125 |
| Type of SEP: | Contribution to a Third-Party Pre-Approved SEP |
| Third-Party Administrator: | Southeast Texas Regional Planning Commission |
| Project Name: | <i>Southeast Texas Regional Air Monitoring Network</i> |
| Total Project Budget: | \$1,500,000 |
| Location of SEP: | Jefferson and Orange Counties |

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

I. Project Description

A. Project

The Respondent shall contribute the SEP Offset Amount to the **Southeast Texas Regional Planning Commission**, as a Third-Party Administrator, for the *Southeast Texas Regional Air Monitoring Network* project (the “Project”). This Project involves air quality monitoring throughout Jefferson and Orange Counties, and specifically the Beaumont and Port Arthur area. The Third-Party Administrator operates nine air monitors in this area.

The Third-Party Administrator shall use the SEP Offset Amount to pay a contractor for monthly operation and maintenance of the sites, acquisition of all data from the monitors, processing and validating all data, monthly reporting of data, and performance of Quality Assurance Audits on all hardware systems. The air monitors will operate on a continuous basis, 24 hours per day, 365 days per year. The Third-Party Administrator shall ensure that the data is validated and sent to TCEQ’s Leading Environmental Analysis and Display System (“LEADS”) in a format acceptable to TCEQ. The Project will be done in accordance with all federal, state, and local environmental laws and regulations. The contribution will be used in accordance with the Supplemental Environmental Project between the Third-Party Administrator and the TCEQ.

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

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

B. Environmental Benefit

The Project will provide environmental benefits to the Beaumont and Port Arthur area by providing measurements of concentrations of certain air pollutants and an evaluation of those air pollutants. Continued air monitoring in this area will help with better understanding air quality pollutants and will enable better identification of emissions sources. The data will focus

on specific chemicals that may raise air quality concerns. The information obtained from this network will provide the area's community with more knowledge of the types and quantities of pollutants emitted from the industries in this area. In addition, data obtained from the monitoring sites and made available to the public may be used by TCEQ and EPA.

C. Minimum Expenditure

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

2. Performance Schedule

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

Southeast Texas Regional Planning Commission
Attention: Director
Transportation & Environmental Resources
2210 Eastex Freeway
Beaumont, Texas 77703

3. Records and Reporting

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

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

4. Failure to Fully Perform

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

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

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

5. Publicity

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

6. Recognition

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

7. Other SEPs by TCEQ or Other Agencies

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