

Executive Summary – Enforcement Matter – Case No. 68184
Indorama Ventures Oxides LLC
RN100219252
Docket No. 2025-1087-AIR-E

Order Type:

1660 Agreed Order

Findings Order Justification:

N/A

Media:

AIR

Small Business:

No

Location(s) Where Violation(s) Occurred:

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

Type of Operation:

Petrochemical 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: January 2, 2026

Comments Received: No

Penalty Information

Total Penalty Assessed: \$18,625

Amount Deferred for Expedited Settlement: \$3,725

Total Paid to General Revenue: \$8,450

Total Due to General Revenue: \$0

Payment Plan: N/A

Supplemental Environmental Project (“SEP”) Conditional Offset: \$6,450

Name of SEP: Texas Association of Resource Conservation & Development
Areas, Inc. (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 20, 2025 through July 1, 2025

Date(s) of NOE(s): July 3, 2025

Executive Summary – Enforcement Matter – Case No. 68184
Indorama Ventures Oxides LLC
RN100219252
Docket No. 2025-1087-AIR-E

Violation Information

Failed to prevent unauthorized emissions. Specifically, the Respondent released 8,076.67 pounds ("lbs") of volatile organic compounds ("VOC") as fugitive emissions and 1,475.73 lbs of carbon monoxide, 270.74 lbs of nitrogen oxides, and 1,659.25 lbs of VOC from the Flare No. 3, Emissions Point Number UER037, during an emissions event (Incident No. 424887) that began on June 12, 2024 and lasted 14 hours and 30 minutes [30 TEX. ADMIN. CODE §§ 116.115(c) and 122.143(4), New Source Review ("NSR") Permit No. 5952A, Special Conditions ("SC") No. 1, NSR Permit No. 106169, SC No. 1, NSR Permit No. 19823, SC No. 1, Federal Operating Permit ("FOP") No. O2288, General Terms and Conditions ("GTC") and Special Terms and Conditions ("STC") No. 19, FOP No. O1320, GTC and SCT No. 16, 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:
 - a. Within 30 days, submit written documentation that demonstrates actions taken to prevent the recurrence of emissions events due to the same or similar causes as Incident No. 424887; and
 - b. Within 45 days, submit written certification to demonstrate compliance with a.

Contact Information

TCEQ Attorney: N/A

TCEQ Enforcement Coordinator: Christina Ferrara, Enforcement Division, Enforcement Team 2, MC R-12, (512) 239-5081; Michael Parrish, Enforcement Division, MC R-12, (512) 239-2548

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

SEP Third-Party Administrator: Texas Association of Resource Conservation & Development Areas, Inc., P.O. Box 2533, Victoria, Texas 77902

Respondent: Kimberly A. Hoyt, Manufacturing & Transformation Office Lead, Indorama Ventures Oxides LLC, 2701 Spur 136, Port Neches, Texas 77651

Respondent's Attorney: N/A



Penalty Calculation Worksheet (PCW)

Policy Revision 5 (January 28, 2021)

PCW Revision February 11, 2021

DATES	Assigned	9-Jul-2025	Screening	9-Jul-2025	EPA Due	
	PCW	7-Nov-2025				

RESPONDENT/FACILITY INFORMATION	
Respondent	Indorama Ventures Oxides LLC
Reg. Ent. Ref. No.	RN100219252
Facility/Site Region	10-Beaumont
Major/Minor Source	Major

CASE INFORMATION				
Enf./Case ID No.	68184	No. of Violations	1	
Docket No.	2025-1087-AIR-E	Order Type	1660	
Media Program(s)	Air	Government/Non-Profit	No	
Multi-Media		Enf. Coordinator	Christina Ferrara	
		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	\$12,500
---	-------------------	----------

ADJUSTMENTS (+/-) TO SUBTOTAL 1

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

Compliance History	49.0%	Adjustment	Subtotals 2, 3, & 7	\$6,125
---------------------------	-------	------------	--------------------------------	---------

Notes: Enhancement for four NOVs with same/similar violations, six NOVs with dissimilar violations, and one order containing denial of liability. Reductions for three notices of intent to conduct an audit.

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: \$532
 Estimated Cost of Compliance: \$10,000
 *Capped at the Total EB \$ Amount

SUM OF SUBTOTALS 1-7	Final Subtotal	\$18,625
-----------------------------	-----------------------	----------

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

Reduces or enhances the Final Subtotal by the indicated percentage.

Notes:

Final Penalty Amount	\$18,625
-----------------------------	----------

STATUTORY LIMIT ADJUSTMENT	Final Assessed Penalty	\$18,625
-----------------------------------	-------------------------------	----------

DEFERRAL	20.0%	Reduction	Adjustment	-\$3,725
-----------------	-------	-----------	-------------------	----------

Reduces the Final Assessed Penalty by the indicated percentage.

Notes:

Deferral offered for expedited settlement.

PAYABLE PENALTY	\$14,900
------------------------	----------

Screening Date 9-Jul-2025

Docket No. 2025-1087-AIR-E

PCW

Respondent Indorama Ventures Oxides LLC

Policy Revision 5 (January 28, 2021)

Case ID No. 68184

PCW Revision February 11, 2021

Reg. Ent. Reference No. RN100219252

Media Air

Enf. Coordinator Christina Ferrara

Compliance History Worksheet

>> Compliance History Site Enhancement (Subtotal 2)

Component	Number of...	Number	Adjust.
NOVs	Written notices of violation ("NOVs") with same or similar violations as those in the current enforcement action (<i>number of NOVs meeting criteria</i>)	4	20%
	Other written NOVs	6	12%
Orders	Any agreed final enforcement orders containing a denial of liability (<i>number of orders meeting criteria</i>)	1	20%
	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>)	3	-3%
	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>)	0	0%
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) 49%

>> Repeat Violator (Subtotal 3)

No

Adjustment Percentage (Subtotal 3) 0%

>> Compliance History Person Classification (Subtotal 7)

Satisfactory Performer

Adjustment Percentage (Subtotal 7) 0%

>> Compliance History Summary

Compliance History Notes

Enhancement for four NOVs with same/similar violations, six NOVs with dissimilar violations, and one order containing denial of liability. Reductions for three notices of intent to conduct an audit.

Total Compliance History Adjustment Percentage (Subtotals 2, 3, & 7) 49%

>> Final Compliance History Adjustment

Final Adjustment Percentage *capped at 100% 49%

Screening Date 9-Jul-2025 **Docket No.** 2025-1087-AIR-E **PCW**
Respondent Indorama Ventures Oxides LLC *Policy Revision 5 (January 28, 2021)*
Case ID No. 68184 *PCW Revision February 11, 2021*
Reg. Ent. Reference No. RN100219252
Media Air
Enf. Coordinator Christina Ferrara

Violation Number
Rule Cite(s) 30 Tex. Admin. Code §§ 116.115(c) and 122.143(4), New Source Review ("NSR") Permit No. 5952A, Special Conditions ("SC") No. 1, NSR Permit No. 106169, SC No. 1, NSR Permit No. 19823, SC No. 1, Federal Operating Permit ("FOP") No. O2288, General Terms and Conditions ("GTC") and Special Terms and Conditions ("STC") No. 19, FOP No. O1320, GTC and SCT No. 16, and Tex. Health & Safety Code § 382.085(b)
Violation Description Failed to prevent unauthorized emissions. Specifically, the Respondent released 8,076.67 pounds ("lbs") of volatile organic compounds ("VOC") as fugitive emissions and 1,475.73 lbs of carbon monoxide, 270.74 lbs of nitrogen oxides, and 1,659.25 lbs of VOC from the Flare No. 3, Emissions Point Number UER037, during an emissions event (Incident No. 424887) that began on June 12, 2024 and lasted 14 hours and 30 minutes.

Base Penalty

>> Environmental, Property and Human Health Matrix

OR	Release	Harm			Percent
		Major	Moderate	Minor	
	Actual	<input type="text"/>	<input checked="" type="text" value="x"/>	<input type="text"/>	<input type="text" value="50.0%"/>
	Potential	<input type="text"/>	<input type="text"/>	<input type="text"/>	

>> Programmatic Matrix

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

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

Adjustment

Violation Events

Number of Violation Events Number of violation days

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

Violation Base Penalty

One weekly event is recommended.

Good Faith Efforts to Comply Reduction

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

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

Violation Subtotal

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

Estimated EB Amount **Violation Final Penalty Total**

This violation Final Assessed Penalty (adjusted for limits)

Economic Benefit Worksheet

Respondent Indorama Ventures Oxides LLC
Case ID No. 68184
Reg. Ent. Reference No. RN100219252
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	12-Jun-2024	5-Jul-2025	1.06	\$532	n/a	\$532

Notes for DELAYED costs

Estimated cost to implement measures designed to prevent the recurrence of emissions events due to the same or similar causes as Incident No. 424887. The Date Required is the date the emissions event began and the Final Date is the estimated date of compliance.

Avoided Costs

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

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

Notes for AVOIDED costs

Approx. Cost of Compliance

\$10,000

TOTAL

\$532



Compliance History Report

Compliance History Report for CN605743038, RN100219252, Rating Year 2025 which includes Compliance History (CH) components from September 1, 2020, through August 31, 2025.

Customer, Respondent, or Owner/Operator:	CN605743038, Indorama Ventures Oxides LLC	Classification:	SATISFACTORY	Rating:	5.74
Regulated Entity:	RN100219252, PORT NECHES OPERATIONS	Classification:	SATISFACTORY	Rating:	10.15
Complexity Points:	33	Repeat Violator:	NO		
CH Group:	05 - Chemical Manufacturing				
Location:	2701 SPUR 136, PORT NECHES, JEFFERSON COUNTY, TX				
TCEQ Region:	REGION 10 - BEAUMONT				

ID Number(s):

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

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

AIR NEW SOURCE PERMITS REGISTRATION 78974
AIR NEW SOURCE PERMITS REGISTRATION 80149
AIR NEW SOURCE PERMITS REGISTRATION 81531
AIR NEW SOURCE PERMITS REGISTRATION 82922
AIR NEW SOURCE PERMITS EPA PERMIT PSDTX780
AIR NEW SOURCE PERMITS REGISTRATION 139463
AIR NEW SOURCE PERMITS REGISTRATION 110757
AIR NEW SOURCE PERMITS REGISTRATION 110787
AIR NEW SOURCE PERMITS REGISTRATION 110808
AIR NEW SOURCE PERMITS REGISTRATION 150790
AIR NEW SOURCE PERMITS REGISTRATION 153791
AIR NEW SOURCE PERMITS REGISTRATION 152840
AIR NEW SOURCE PERMITS REGISTRATION 154036
AIR NEW SOURCE PERMITS REGISTRATION 164694
AIR NEW SOURCE PERMITS REGISTRATION 168479
AIR NEW SOURCE PERMITS REGISTRATION 169413
AIR NEW SOURCE PERMITS REGISTRATION 164877
AIR NEW SOURCE PERMITS REGISTRATION 167574
AIR NEW SOURCE PERMITS REGISTRATION 170963
AIR NEW SOURCE PERMITS REGISTRATION 163874
AIR NEW SOURCE PERMITS REGISTRATION 142196
AIR NEW SOURCE PERMITS REGISTRATION 148227
AIR NEW SOURCE PERMITS REGISTRATION 150992
AIR NEW SOURCE PERMITS PERMIT 79802
AIR NEW SOURCE PERMITS REGISTRATION 160594
AIR NEW SOURCE PERMITS REGISTRATION 159322
AIR NEW SOURCE PERMITS REGISTRATION 161151
AIR NEW SOURCE PERMITS REGISTRATION 152402
AIR NEW SOURCE PERMITS REGISTRATION 155384
AIR NEW SOURCE PERMITS REGISTRATION 155634
AIR NEW SOURCE PERMITS REGISTRATION 174868
AIR NEW SOURCE PERMITS REGISTRATION 175090
AIR NEW SOURCE PERMITS REGISTRATION 174436
AIR NEW SOURCE PERMITS REGISTRATION 176486
AIR NEW SOURCE PERMITS REGISTRATION 171678
AIR NEW SOURCE PERMITS REGISTRATION 179353
AIR NEW SOURCE PERMITS REGISTRATION 180561
AIR NEW SOURCE PERMITS PERMIT AMOC247

PETROLEUM STORAGE TANK REGISTRATION

REGISTRATION 79935

WASTEWATER PERMIT WQ0000511000

AIR EMISSIONS INVENTORY ACCOUNT NUMBER
JE0052V

INDUSTRIAL AND HAZARDOUS WASTE PERMIT 50055

INDUSTRIAL AND HAZARDOUS WASTE EPA ID
TX0000201202

INDUSTRIAL AND HAZARDOUS WASTE SOLID WASTE
REGISTRATION # (SWR) 30029

TAX RELIEF ID NUMBER 17974

TAX RELIEF ID NUMBER 17986

TAX RELIEF ID NUMBER 17100

TAX RELIEF ID NUMBER 17975

TAX RELIEF ID NUMBER 17983

TAX RELIEF ID NUMBER 18840

TAX RELIEF ID NUMBER 17970

TAX RELIEF ID NUMBER 17088

AIR NEW SOURCE PERMITS REGISTRATION 79529

AIR NEW SOURCE PERMITS REGISTRATION 80702

AIR NEW SOURCE PERMITS REGISTRATION 81415

AIR NEW SOURCE PERMITS REGISTRATION 92256

AIR NEW SOURCE PERMITS REGISTRATION 91994

AIR NEW SOURCE PERMITS PERMIT 106169

AIR NEW SOURCE PERMITS REGISTRATION 109215

AIR NEW SOURCE PERMITS REGISTRATION 110809

AIR NEW SOURCE PERMITS REGISTRATION 110813

AIR NEW SOURCE PERMITS REGISTRATION 150484

AIR NEW SOURCE PERMITS REGISTRATION 150307

AIR NEW SOURCE PERMITS REGISTRATION 152982

AIR NEW SOURCE PERMITS REGISTRATION 163020

AIR NEW SOURCE PERMITS REGISTRATION 169507

AIR NEW SOURCE PERMITS REGISTRATION 164604

AIR NEW SOURCE PERMITS REGISTRATION 166541

AIR NEW SOURCE PERMITS REGISTRATION 167060

AIR NEW SOURCE PERMITS REGISTRATION 170571

AIR NEW SOURCE PERMITS REGISTRATION 169228

AIR NEW SOURCE PERMITS REGISTRATION 166117

AIR NEW SOURCE PERMITS REGISTRATION 151107

AIR NEW SOURCE PERMITS REGISTRATION 143027

AIR NEW SOURCE PERMITS REGISTRATION 156133

AIR NEW SOURCE PERMITS REGISTRATION 155871

AIR NEW SOURCE PERMITS REGISTRATION 160459

AIR NEW SOURCE PERMITS REGISTRATION 155472

AIR NEW SOURCE PERMITS REGISTRATION 161628

AIR NEW SOURCE PERMITS REGISTRATION 160045

AIR NEW SOURCE PERMITS REGISTRATION 160606

AIR NEW SOURCE PERMITS REGISTRATION 173250

AIR NEW SOURCE PERMITS REGISTRATION 171239

AIR NEW SOURCE PERMITS REGISTRATION 172894

AIR NEW SOURCE PERMITS REGISTRATION 175892

AIR NEW SOURCE PERMITS REGISTRATION 178183

AIR NEW SOURCE PERMITS REGISTRATION 179883

AIR NEW SOURCE PERMITS PERMIT AMOC248

AIR NEW SOURCE PERMITS REGISTRATION 179352

PETROLEUM STORAGE TANK REGISTRATION

REGISTRATION 40711

IHW CORRECTIVE ACTION SOLID WASTE

REGISTRATION # (SWR) 30029

WASTEWATER EPA ID TX0005070

POLLUTION PREVENTION PLANNING ID NUMBER

P00679

INDUSTRIAL AND HAZARDOUS WASTE PERMIT 50363

INDUSTRIAL AND HAZARDOUS WASTE EPA ID

TXD008076846

TAX RELIEF ID NUMBER 17954

TAX RELIEF ID NUMBER 17984

TAX RELIEF ID NUMBER 17095

TAX RELIEF ID NUMBER 17093

TAX RELIEF ID NUMBER 17940

TAX RELIEF ID NUMBER 17977

TAX RELIEF ID NUMBER 18835

TAX RELIEF ID NUMBER 17985

TAX RELIEF ID NUMBER 24379

Compliance History Period: September 01, 2020 to August 31, 2025

Rating Year: 2025

Rating Date: 09/01/2025

Date Compliance History Report Prepared: November 07, 2025

Agency Decision Requiring Compliance History: Enforcement

Component Period Selected: November 07, 2020 to November 07, 2025

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

Name: Yuliya Dunaway

Phone: (512) 239-5081

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

Classification: Moderate

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

Rqmt Prov: NSR 20160 Special Condition 1 PERMIT
O3056 General Terms and Conditions OP
O3056 Special Condition 17 OP

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

Classification: Moderate

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

Rqmt Prov: FOP O13056 Special Condition 17 OP
FOP O3056 General Terms and Conditions OP
NSR 20160 Special Condition 1 PERMIT

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

Classification: Moderate

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

Rqmt Prov: FOP O3056 General Terms and Conditions OP
FOP O3056 Special Condition 2F OP

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

Classification: Moderate

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

Rqmt Prov: FOP O1320 General Terms and Conditions OP
FOP O1320 Special Condition 15 OP
FOP O3056 General Terms and Conditions OP
FOP O3056 Special Condition 17 OP
NSR 106169 Special Condition 1 PERMIT
NSR 20160 Special Condition 1 PERMIT

NSR 5952A Special Condition 1 PERMIT

NSR 5972A Special Condition 1 PERMIT

Description: Failure to prevent unauthorized emissions. The Respondent released 289.72 lbs of VOC, 70.66 lbs of NOx, 516.89 lbs of CO, and 17.72 lbs of acetone from the PO Ground Flare, EPN POFLARE, and 17,253.34 lbs of VOC as fugitive emissions from the F4 Unit (3,702.85 lbs), the F6 Unit (7,109.53 lbs), and the F8 Unit (6,440.96 lbs), during an emissions event (Incident No. 343692) that began on October 9, 2020 and lasted eight hours. The

B. Criminal convictions:

N/A

C. Chronic excessive emissions events:

N/A

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

Item 1	January 15, 2021	(1690222)
Item 2	May 30, 2021	(1705313)
Item 3	June 03, 2021	(1705331)
Item 4	June 04, 2021	(1706401)
Item 5	June 08, 2021	(1706652)
Item 6	June 09, 2021	(1706708)
Item 7	June 25, 2021	(1735131)
Item 8	November 08, 2021	(1765078)
Item 9	November 16, 2021	(1762383)
Item 10	November 22, 2021	(1783603)
Item 11	December 07, 2021	(1764498)
Item 12	December 24, 2021	(1790627)
Item 13	January 20, 2022	(1798422)
Item 14	February 17, 2022	(1782346)
Item 15	March 14, 2022	(1782372)
Item 17	May 20, 2022	(1817383)
Item 18	October 20, 2022	(1804094)
Item 19	November 04, 2022	(1853646)
Item 21	November 18, 2022	(1859919)
Item 22	November 24, 2022	(1869473)
Item 23	December 16, 2022	(1866706)
Item 24	December 19, 2022	(1875320)
Item 25	December 20, 2022	(1866347)
Item 26	January 02, 2023	(1867211)
Item 27	January 25, 2023	(1873565)
Item 28	February 09, 2023	(1103459)
Item 29	February 28, 2023	(1880777)
Item 30	June 23, 2023	(1919090)
Item 31	July 31, 2023	(1916632)
Item 34	December 28, 2023	(1945434)
Item 35	January 03, 2024	(1943503)
Item 36	February 23, 2024	(1965948)
Item 37	May 09, 2024	(1908965)
Item 38	May 21, 2024	(1996671)
Item 39	August 20, 2024	(1993903)
Item 40	August 22, 2024	(2002625)
Item 41	October 23, 2024	(2021464)
Item 42	October 25, 2024	(1995672)
Item 43	November 21, 2024	(2020803)
Item 44	December 11, 2024	(2042352)
Item 45	December 27, 2024	(2034419)
Item 46	January 16, 2025	(2049179)
Item 47	February 18, 2025	(2056747)
Item 48	April 03, 2025	(1949827)
Item 49	April 08, 2025	(2055125)
Item 50	April 15, 2025	(2072118)
Item 51	May 09, 2025	(2047341)
Item 52	June 24, 2025	(1989172)
Item 53	October 20, 2025	(2102910)
Item 54	October 28, 2025	(2090031)

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: 02/14/2025 (2041400)
Self Report? NO Classification: Moderate
Citation: 30 TAC Chapter 334, SubChapter C 334.48(g)(1)(B)
Description: Failure to conduct triennial overfill prevention equipment inspection. B1/Mod
Self Report? NO Classification: Moderate
Citation: 30 TAC Chapter 334, SubChapter H 334.48(h)(1)(B)
Description: Failure to conduct annual walkthrough inspections for under dispenser areas that do not have containment sumps. B1/Mod
Self Report? NO Classification: Moderate
Citation: 30 TAC Chapter 334, SubChapter C 334.48(g)(1)(A)(ii)
Description: Failure to conduct triennial testing of spill buckets. B1/Mod
- 2 Date: 02/28/2025 (2065313)
Self Report? YES Classification: Moderate
Citation: 2D TWC Chapter 26, SubChapter A 26.121(a)
30 TAC Chapter 305, SubChapter F 305.125(1)
Description: Failure to meet the limit for one or more permit parameter
- 3 Date: 04/30/2025 (2078517)
Self Report? YES Classification: Moderate
Citation: 2D TWC Chapter 26, SubChapter A 26.121(a)
30 TAC Chapter 305, SubChapter F 305.125(1)
Description: Failure to meet the limit for one or more permit parameter
- 4 Date: 05/31/2025 (2085608)
Self Report? YES Classification: Moderate
Citation: 2D TWC Chapter 26, SubChapter A 26.121(a)
30 TAC Chapter 305, SubChapter F 305.125(1)
Description: Failure to meet the limit for one or more permit parameter
- 5 Date: 06/16/2025 (2071403)
Self Report? NO Classification: Moderate
Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)
5C THSC Chapter 382 382.085(b)
FOP O1320 GTC OP
FOP O1320 SC 16 OP
NSR 5952A SC 14B PERMIT
Description: Failure to maintain the F6 Incinerator within the permitted temperature limit as required. EIC B18(g)(1) Mod 2D
Self Report? NO Classification: Moderate
Citation: FOP O1320 SC 16 OP
30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)
5C THSC Chapter 382 382.085(b)
FOP O1320 GTC OP
NSR 5952A SC 10 PERMIT
Description: Failure to maintain Ethylene Oxide in the F6 Wastewater Conveyance below permitted limits as required. EIC B18(g)(1) Mod 2D
- 6 Date: 06/30/2025 (2092717)
Self Report? YES Classification: Moderate
Citation: 2D TWC Chapter 26, SubChapter A 26.121(a)
30 TAC Chapter 305, SubChapter F 305.125(1)
Description: Failure to meet the limit for one or more permit parameter
- 7 Date: 07/31/2025 (2099297)
Self Report? YES Classification: Moderate
Citation: 2D TWC Chapter 26, SubChapter A 26.121(a)
30 TAC Chapter 305, SubChapter F 305.125(1)
Description: Failure to meet the limit for one or more permit parameter
- 8 Date: 08/08/2025 (2084627)

Self Report? NO Classification: Moderate
 Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
 30 TAC Chapter 122, SubChapter B 122.143(4)
 5C THSC Chapter 382 382.085(b)
 FOP O3056 GTC OP
 FOP O3056 STC 18 OP
 NSR 20160 SC 14A PERMIT
 NSR 20160 SC 14I PERMIT
 NSR 20160 SC 17 PERMIT
 NSR 20160 SC 17B PERMIT
 NSR 83816 SC 11A(i) (MSS) PERMIT
 Description: Failure to comply with permitted emissions rates for Boiler H-K2-004, EPN
 HK-F5-004. EIC B18(g)(1) Mod 2D

Self Report? NO Classification: Moderate
 Citation: 30 TAC Chapter 115, SubChapter D 115.354
 30 TAC Chapter 116, SubChapter B 116.115(c)
 30 TAC Chapter 122, SubChapter B 122.143(4)
 40 CFR Chapter 264, SubChapter I, PT 264, SubPT BB 264.1050
 40 CFR Chapter 60, SubChapter C, PT 60, SubPT VV 60.480
 40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.160
 5C THSC Chapter 382 382.085(b)
 FOP O3056 GTC OP
 FOP O3056 STC 18 PERMIT
 FOP O3056 STC 1A OP
 NSR 20160 SC 21 PERMIT
 NSR 20160 SC 4D PERMIT
 NSR 20160 SC 5D PERMIT
 Description: Failure to add components in VOC and organic hazardous air pollutant (HAP)
 service to Leak Detection and Repair (LDAR) program and monitor them as
 required. EIC B18g(9) Mod 2A

Self Report? NO Classification: Moderate
 Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
 30 TAC Chapter 122, SubChapter B 122.143(4)
 40 CFR Chapter 63, SubChapter C, PT 63, SubPT EEE 63.1206(c)(7)(i)
 5C THSC Chapter 382 382.085(b)
 NSR 20160 SC 5F PERMIT
 O3056 GTC OP
 O3056 STC 18 OP
 O3056 STC 1A OP
 Description: Failure to perform calibrations according to the operation and maintenance
 plan for Hazardous Waste Combustors as required. EIC B1 Mod 2A

Self Report? NO Classification: Minor
 Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
 30 TAC Chapter 122, SubChapter B 122.143(4)
 40 CFR Part 60, Subpart VV 60.482-2
 40 CFR Part 60, Subpart VV 60.482-7
 5C THSC Chapter 382 382.085(b)
 FOP O3056 GTC OP
 FOP O3056 STC 18 OP
 FOP O3056 STC 1A OP
 NSR 20160 SC 4D PERMIT
 Description: Failure to monitor LDAR components as required. EIC B1 Minor 3A

Self Report? NO Classification: Minor
 Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
 30 TAC Chapter 122, SubChapter B 122.143(4)
 5C THSC Chapter 382 382.085(b)
 FOP O3056 GTC OP
 FOP O3056 STC 18 OP
 NSR 20160 SC 21E PERMIT
 NSR 20160 SC 21F PERMIT
 Description: Failure to maintain weekly audio, visual, and olfactory (AVO) records as
 required. EIC C3 Minor 3C

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

Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)
40 CFR Chapter 60, SubChapter C, PT 60, SubPT A 60.18(c)(2)
5C THSC Chapter 382 382.085(b)
FOP O2287 GTC OP
FOP O2287 STC 11 OP
NSR 647B SC 5B PERMIT
Description: Failure to operate a flare with a flame present at all times. EIC B18(g)(1)
Mod 2D

Self Report? NO Classification: Moderate

Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)
5C THSC Chapter 382 382.085(b)
FOP O2287 GTC OP
FOP O2287 STC 11 OP
NSR 5807A SC 1 PERMIT

Description: Failure to comply with permitted emissions rates for E4 Unit Tank Car
Loading, EPN E4LREAW. EIC B18(g)(1) Mod 2D

Self Report? NO Classification: Moderate

Citation: 30 TAC Chapter 116, SubChapter B 116.115(b)(2)(E)
30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)
5C THSC Chapter 382 382.085(b)
FOP O2287 GTC OP
FOP O2287 STC 11 OP
NSR 647B SC 19 PERMIT

Description: Failure to demonstrate compliance with the operating parameters for the E7
Loading Scrubber, EPN E7TTLOAD. EIC B18(g)(1) Mod 2D

Self Report? NO Classification: Moderate

Citation: 30 TAC Chapter 122, SubChapter B 122.143(4)
30 TAC Chapter 122, SubChapter B 122.145(2)(A)
5C THSC Chapter 382 382.085(b)
FOP O2287 GTC OP

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

10

Date: 08/28/2025 (2089602)

Self Report? NO Classification: Moderate

Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)
5C THSC Chapter 382 382.085(b)
FOP O2288 GTC OP
FOP O2288 SC 19 OP
NSR 19823 SC 25F PERMIT

Description: Failure to maintain wastewater carbon bed Volatile Organic Compounds
(VOC) concentrations below permitted limits. EIC B18(g)(1) Mod 2D

Self Report? NO Classification: Moderate

Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)
5C THSC Chapter 382 382.085(b)
FOP O2288 GTC OP
FOP O2288 SC 19 OP
NSR 19823 SC 1 PERMIT
NSR 19823 SC 13A PERMIT
NSR 19823 SC 9 PERMIT
NSR 83816 SC 11A(ii) (MSS) PERMIT

Description: Failure to comply with permitted limits for the Waste Heat Boiler H-A3-5, EPN
A3HA35. EIC B18(g)(1) Mod 2D

Self Report? NO Classification: Moderate

Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)
40 CFR Chapter 60, SubChapter C, PT 60, SubPT A 60.18(c)(3)(ii)
5C THSC Chapter 382 382.085(b)
FOP O2288 GTC OP
FOP O2288 SC 19 OP
FOP O2288 SC 1A OP
NSR 19823 SC 10A PERMIT

Description: Failure to maintain the minimum heating value for the South Flare, EPN
UER037. EIC B18(g)(1) Mod 2D

Self Report? NO Classification: Moderate

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

30 TAC Chapter 122, SubChapter B 122.143(4)
 40 CFR Chapter 60, SubChapter C, PT 60, SubPT A 60.18(c)(3)(ii)
 5C THSC Chapter 382 382.085(b)
 FOP O2288 GTC OP
 FOP O2288 SC 19 OP
 FOP O2288 SC 1A OP
 NSR 19823 SC 10A PERMIT

Description: Failure to maintain the minimum heating value for the North Flare, EPN UER044. EIC B18(g)(1) Mod 2D

Self Report? NO **Classification:** Moderate

Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
 30 TAC Chapter 122, SubChapter B 122.143(4)
 40 CFR Chapter 60, SubChapter C, PT 60, SubPT A 60.18(c)(3)(ii)
 5C THSC Chapter 382 382.085(b)
 FOP O2288 GTC OP
 FOP O2288 SC 19 OP
 FOP O2288 SC 1A OP
 NSR 19823 SC 10A PERMIT

Description: Failure to maintain the minimum heating value for the Center Flare, EPN UER046. EIC B18(g)(1) Mod 2D

Self Report? NO **Classification:** Moderate

Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
 30 TAC Chapter 122, SubChapter B 122.143(4)
 5C THSC Chapter 382 382.085(b)
 FOP O2288 GTC OP
 FOP O2288 SC 19 OP
 NSR 19823 SC 10F PERMIT

Description: Failure to maintain flare heat inputs below the maximum limit for the South Flare, EPN UER037, as required. EIC B18(g)(1) Mod 2D

Self Report? NO **Classification:** Moderate

Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
 30 TAC Chapter 122, SubChapter B 122.143(4)
 5C THSC Chapter 382 382.085(b)
 FOP O2288 GTC OP
 FOP O2288 SC 19 OP
 NSR 19823 SC 10F PERMIT

Description: Failure to maintain flare heat inputs below the maximum combined limit for the North/Center Flares, EPNs UER044 and UER046, as required. EIC B18(g)(1) Mod 2D

Self Report? NO **Classification:** Moderate

Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
 30 TAC Chapter 122, SubChapter B 122.143(4)
 40 CFR Chapter 60, SubChapter C, PT 60, SubPT A 60.18(c)(1)
 5C THSC Chapter 382 382.085(b)
 FOP O2288 GTC OP
 FOP O2288 SC 19 OP
 NSR 19823 SC 10C PERMIT

Description: Failure to operate a flare with no visible emissions present except for periods not to exceed a total of 5 minutes during any 2 consecutive hours. EIC B18(g)(1) Mod 2D

Self Report? NO **Classification:** Moderate

Citation: 30 TAC Chapter 101, SubChapter A 101.20(3)
 30 TAC Chapter 116, SubChapter B 116.115(c)
 30 TAC Chapter 122, SubChapter B 122.143(4)
 5C THSC Chapter 382 382.085(b)
 FOP O2288 GTC OP
 FOP O2288 SC 19 OP

NSR 16909 & PSDTX780 SC 1 PERMIT
 NSR 16909 & PSDTX780 SC 4 PERMIT
 NSR 83816 SC 11A(ii) (MSS) PERMIT

Description: Failure to comply with permitted emissions rates for the Cogen Unit 2, EPN CG2. EIC B18(g)(1) Mod 2D

Self Report? NO **Classification:** Moderate

Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
 30 TAC Chapter 122, SubChapter B 122.143(4)
 5C THSC Chapter 382 382.085(b)
 FOP O2288 GTC OP
 FOP O2288 SC 19 OP
 NSR 49247 SC 3 PERMIT

Description: Failure to maintain the minimum concentration in the aeration basins as required. EIC B18(g)(1) Mod 2D

Self Report? NO **Classification:** Moderate

Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
 30 TAC Chapter 122, SubChapter B 122.143(4)
 5C THSC Chapter 382 382.085(b)
 FOP O2288 GTC OP
 FOP O2288 SC 19 OP
 FOP O2288 SC 1A OP
 NSR 19823 SC 5C PERMIT

Description: Failure to maintain required records for ethylene cracking furnace decoking operations. EIC B3 Mod 2B

Self Report? NO Classification: Moderate

Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
 30 TAC Chapter 122, SubChapter B 122.143(4)
 40 CFR Chapter 1, Subchapter C, PT 63, Subpt YY 63.1103(e)(4)
 40 CFR Chapter 63, SubChapter C, PT 63, SubPT CC 63.670(o)(4)
 5C THSC Chapter 382 382.085(b)
 FOP O2288 GTC OP
 FOP O2288 SC 19 OP
 FOP O2288 SC 1A OP
 NSR 19823 SC 5C PERMIT

Description: Failure to complete a root cause and corrective action analysis within 45 days of applicable flare flow event. EIC B3 Mod 2B

Self Report? NO Classification: Moderate

Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
 30 TAC Chapter 122, SubChapter B 122.143(4)
 40 CFR Chapter 1, Subchapter C, PT 63, Subpt YY 63.1103(e)(4)
 40 CFR Chapter 63, SubChapter C, PT 63, SubPT CC 63.670(b)
 5C THSC Chapter 382 382.085(b)
 FOP O2288 GTC OP
 FOP O2288 SC 19 OP
 FOP O2288 SC 1A OP
 NSR 19823 SC 10B PERMIT
 NSR 19823 SC 5C PERMIT

Description: Failure to maintain a flare operating with pilot flame as required. EIC B18(g)(1) Mod 2D

Self Report? NO Classification: Moderate

Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
 30 TAC Chapter 122, SubChapter B 122.143(4)
 40 CFR Chapter 1, Subchapter C, PT 63, Subpt YY 63.1103(e)(4)
 40 CFR Chapter 63, SubChapter C, PT 63, SubPT CC 63.670(d)
 40 CFR Chapter 63, SubChapter C, PT 63, SubPT CC 63.670(e)
 5C THSC Chapter 382 382.085(b)
 FOP O2288 GTC OP
 FOP O2288 SC 19 OP
 FOP O2288 SC 1A OP
 NSR 19823 SC 5C PERMIT

Description: Failure to continuously calculate the flare tip velocity and net heating value of the combustion zone on a 15-minute block period basis for the three A3 Unit South, North, and Center Flares, EPNs UER037, UERo44, and UER046, respectively. EIC B3 Mod 2B

Self Report? NO Classification: Moderate

Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
 30 TAC Chapter 122, SubChapter B 122.143(4)
 40 CFR Chapter 1, Subchapter C, PT 63, Subpt YY 63.1103(e)(4)
 40 CFR Chapter 63, SubChapter C, PT 63, SubPT CC 63.670(h)(2)
 5C THSC Chapter 382 382.085(b)
 FOP O2288 GTC OP
 FOP O2288 SC 19 OP
 FOP O2288 SC 1A OP
 NSR 19823 SC 5C PERMIT

Description: Failure to maintain continuously recorded images for visual emissions observations of the flare flame for the three A3 Unit South, North, and Center Flares, EPNs UER037, UERo44, and UER046, respectively. EIC B3 Mod 2B

Self Report? NO Classification: Moderate

Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
 30 TAC Chapter 122, SubChapter B 122.143(4)
 40 CFR Chapter 1, Subchapter C, PT 63, Subpt YY 63.1103(e)(4)
 5C THSC Chapter 382 382.085(b)
 FOP O2288 GTC OP
 FOP O2288 SC 19 OP
 FOP O2288 SC 1A OP
 NSR 19823 SC 5C PERMIT

Description: Failure to maintain a minimum net heating value in the combustion zone of 270 Btu/scf of the gas being combusted in the steam assisted A3 Unit South, North, and Center Flares, EPNs UER037, UERo44, and UER046, respectively. EIC B18(g)(1) Mod 2D

Self Report? NO Classification: Moderate

Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
40 CFR Chapter 61, SubChapter C, PT 61, SubPT FF 61.343(a)
40 CFR Chapter 61, SubChapter C, PT 61, SubPT FF 61.346(b)(3)
40 CFR Chapter 61, SubChapter C, PT 61, SubPT FF 61.349(f)
5C THSC Chapter 382 382.085(b)
FOP O2288 GTC OP
FOP O2288 SC 19 OP
FOP O2288 SC 1A OP
NSR 19823 SC 4C PERMIT

Description: Failure to conduct inspections and monitoring for all equipment in benzene waste operations, as required. EIC B1 Mod 2A

Self Report? NO Classification: Moderate

Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)
40 CFR Chapter 61, SubChapter C, PT 61, SubPT FF 61.343(a)
40 CFR Chapter 61, SubChapter C, PT 61, SubPT FF 61.349(a)
40 CFR Chapter 61, SubChapter C, PT 61, SubPT FF 61.351(a)
5C THSC Chapter 382 382.085(b)
FOP O2288 GTC OP
FOP O2288 SC 19 OP
FOP O2288 SC 1A OP
NSR 19823 SC 4C PERMIT

Description: Failure to identify all equipment in BWON service. EIC B1 Mod 2A

Self Report? NO Classification: Moderate

Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)
40 CFR Chapter 61, SubChapter C, PT 61, SubPT FF 61.356(d)
5C THSC Chapter 382 382.085(b)
FOP O2288 GTC OP
FOP O2288 SC 19 OP
FOP O2288 SC 1A OP
NSR 19823 SC 4C PERMIT

Description: Failure to maintain design documentation and certification for BWON control equipment. EIC B3 Mod 2B

Self Report? NO Classification: Moderate

Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)
40 CFR Chapter 61, SubChapter C, PT 61, SubPT FF 61.356(f)
5C THSC Chapter 382 382.085(b)
FOP O2288 GTC OP
FOP O2288 SC 19 OP
FOP O2288 SC 1A OP
NSR 19823 SC 4C PERMIT

Description: Failure to maintain design documentation and certification for BWON control devices. EIC B3 Mod 2B

Self Report? NO Classification: Moderate

Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
40 CFR Chapter 61, SubChapter C, PT 61, SubPT FF 61.355(a)

40 CFR Chapter 61, SubChapter C, PT 61, SubPT FF 61.356(b)
5C THSC Chapter 382 382.085(b)
FOP O2288 GTC OP
FOP O2288 SC 19 OP
FOP O2288 SC 1A OP
NSR 19823 SC 4C PERMIT

Description: Failure to identify all BWON waste streams in the Total Annual Benzene (TAB) and uncontrolled Benzene Quantity (BQ) reports. EIC B3 Mod 2B

Self Report? NO Classification: Moderate

Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)
40 CFR Chapter 61, SubChapter C, PT 61, SubPT FF 61.356(b)
5C THSC Chapter 382 382.085(b)
FOP O2288 GTC OP
FOP O2288 SC 19 OP
FOP O2288 SC 1A OP
NSR 19823 SC 4C PERMIT

Description: Failure to account for all BWON waste streams at the Point of Generation (POG). EIC B3 Mod 2B

Self Report?	NO	Classification:	Moderate
Citation:	30 TAC Chapter 116, SubChapter B 116.115(c) 30 TAC Chapter 122, SubChapter B 122.143(4) 40 CFR Chapter 61, SubChapter C, PT 61, SubPT FF 61.355(a) 40 CFR Chapter 61, SubChapter C, PT 61, SubPT FF 61.356(b) 5C THSC Chapter 382 382.085(b) FOP O2288 GTC OP FOP O2288 SC 19 OP FOP O2288 SC 1A OP NSR 19823 SC 4C PERMIT		
Description:	Failure to update data used to calculate the TAB and uncontrolled BQ to be representative of current operations and configuration of the facility. EIC B3 Mod 2B		
Self Report?	NO	Classification:	Moderate
Citation:	30 TAC Chapter 122, SubChapter B 122.143(4) 30 TAC Chapter 122, SubChapter B 122.145(2) 5C THSC Chapter 382 382.085(b) FOP O2288 GTC OP		
Description:	Failure to report deviations on a deviation report. EIC B3 MOD 2G		
Self Report?	NO	Classification:	Moderate
Citation:	30 TAC Chapter 122, SubChapter B 122.143(4) 30 TAC Chapter 122, SubChapter B 122.146(1) 30 TAC Chapter 122, SubChapter B 122.146(5)(D) FOP O2288 GTC OP		
Description:	Failure to accurately certify compliance with the terms and conditions of permit FOP O2288. EIC B3 MOD 2B		

F. Environmental audits:

Notice of Intent Date: 01/13/2023 (1873588)
 No DOV Associated

Notice of Intent Date: 03/19/2024 (1975857)
 No DOV Associated

Notice of Intent Date: 07/07/2025 (2082733)
 No DOV Associated

G. Type of environmental management systems (EMSs):

N/A

H. Voluntary on-site compliance assessment dates:

N/A

I. Participation in a voluntary pollution reduction program:

N/A

J. Early compliance:

N/A

Sites Outside of Texas:

N/A

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

8 Date: 03/05/2021 (1703206)
Self Report? NO Classification: Moderate
Citation: 30 TAC Chapter 122, SubChapter B 122.143(4)
30 TAC Chapter 122, SubChapter B 122.145(2)(A)
5C THSC Chapter 382 382.085(b)
O1320 General Terms and Conditions OP
Description: Failure to report deviations on a deviation report. EIC B3 MOD 2G

9 Date: 03/31/2021 (1725461)
Self Report? YES Classification: Moderate
Citation: 2D TWC Chapter 26, SubChapter A 26.121(a)
30 TAC Chapter 305, SubChapter F 305.125(1)
Description: Failure to meet the limit for one or more permit parameter

10 Date: 04/30/2021 (1740040)
Self Report? YES Classification: Moderate
Citation: 2D TWC Chapter 26, SubChapter A 26.121(a)
30 TAC Chapter 305, SubChapter F 305.125(1)
Description: Failure to meet the limit for one or more permit parameter

11 Date: 05/12/2021 (1705409)
Self Report? NO Classification: Moderate
Citation: 30 TAC Chapter 116, SubChapter B 116.115(b)(2)(F)
30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)
5C THSC Chapter 382 382.085(b)
NSR 20160 Special Condition 1 PERMIT
NSR 20160 Special Condition 12A PERMIT
NSR 20160 Special Condition 12E PERMIT
O3056 General Terms and Conditions OP
O3056 Special Condition 17 OP
Description: Failure to comply with permitted emissions rates for Boiler H-K2-003,
Emissions Point Number (EPN) HK-F5-003. EIC B18(g)(1) Mod 2D
Self Report? NO Classification: Moderate
Citation: 30 TAC Chapter 115, SubChapter B 115.115(a)(3)(A)
30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)
5C THSC Chapter 382 382.085(b)
NSR 20160 General Condition 10 PERMIT
NSR 83816 Special Condition 12(A)(ii) PERMIT
O3056 General Terms and Conditions OP
O3056 Special Condition 17 OP
Description: Failure to monitor a Carbon Adsorption System (CAS) as required. EIC B1
Mod 2A
Self Report? NO Classification: Moderate
Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)
40 CFR Chapter 60, SubChapter C, PT 60, SubPT A 60.18(c)(3)
5C THSC Chapter 382 382.085(b)
NSR 20160 Special Condition 17G PERMIT
O3056 General Terms and Conditions OP
O3056 Special Condition 17 OP
Description: Failure to maintain the minimum heating value for the PO ground flare, EPN
POFLARE. EIC B18(g)(1) Mod 2D

Self Report? NO Classification: Moderate
Citation:
30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)
5C THSC Chapter 382 382.085(b)
NSR 20160 Special Condition 14B PERMIT
NSR 20160 Special Condition 14I PERMIT
O3056 General Terms and Conditions OP
O3056 Special Condition 17 OP
Description: Failure to comply with permitted emissions rates for Boiler H-K2-004, EPN
HK-F5-004. EIC B18(g)(1) Mod 2D

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

12 Date: 05/31/2021 (1747566)
Self Report? YES Classification: Moderate
Citation:
2D TWC Chapter 26, SubChapter A 26.121(a)
30 TAC Chapter 305, SubChapter F 305.125(1)
Description: Failure to meet the limit for one or more permit parameter

13 Date: 06/30/2021 (1751687)
Self Report? YES Classification: Moderate
Citation:
2D TWC Chapter 26, SubChapter A 26.121(a)
30 TAC Chapter 305, SubChapter F 305.125(1)
Description: Failure to meet the limit for one or more permit parameter

14 Date: 07/31/2021 (1757151)
Self Report? YES Classification: Moderate
Citation:
2D TWC Chapter 26, SubChapter A 26.121(a)
30 TAC Chapter 305, SubChapter F 305.125(1)
Description: Failure to meet the limit for one or more permit parameter

15 Date: 08/05/2021 (1746290)
Self Report? NO Classification: Moderate
Citation:
30 TAC Chapter 122, SubChapter B 122.143(4)
30 TAC Chapter 122, SubChapter B 122.146(2)
5C THSC Chapter 382 382.085(b)
O2287 General Terms and Conditions OP
O2287 Special Condition 14 OP
Description: Failure to submit a timely compliance certification. EIC B3 Mod 2B

16 Date: 08/31/2021 (1766231)
Self Report? YES Classification: Moderate
Citation:
2D TWC Chapter 26, SubChapter A 26.121(a)
30 TAC Chapter 305, SubChapter F 305.125(1)
Description: Failure to meet the limit for one or more permit parameter

17 Date: 08/31/2021 (1756145)
Self Report? NO Classification: Moderate
Citation:

30 TAC Chapter 116, SubChapter B 116.115(c)
 30 TAC Chapter 122, SubChapter B 122.143(4)
 5C THSC Chapter 382 382.085(b)
 FOP O2288 General Terms and Conditions OP
 FOP O2288 Special Condition 19 OP
 NSR 19823 Special Condition 1 PERMIT
 NSR 19823 Special Condition 13A PERMIT
 Description: Failure to comply with permitted emissions rates for the Waste Heat Boiler,
 Emissions Point Number (EPN) A3HA35. EIC B18(g)(1) Mod 2D
 Self Report? NO Classification: Moderate
 Citation:

30 TAC Chapter 101, SubChapter A 101.20(3)
 30 TAC Chapter 116, SubChapter B 116.115(c)
 30 TAC Chapter 122, SubChapter B 122.143(4)
 5C THSC Chapter 382 382.085(b)
 FOP O2288 General Terms and Conditions OP
 FOP O2288 Special Condition 19 OP
 NSR 16909 & PSDTX780 Special Condition 7 PERMIT
 Description: Failure to comply with permitted emissions rates for Boiler HK-11, EPN
 UEHK11. EIC B18(g)(1) Mod 2D
 Self Report? NO Classification: Moderate
 Citation:

30 TAC Chapter 116, SubChapter B 116.115(c)
 30 TAC Chapter 122, SubChapter B 122.143(4)
 5C THSC Chapter 382 382.085(b)
 FOP O2288 General Terms and Conditions OP
 FOP O2288 Special Condition 19 OP
 NSR 19823 Special Condition 8 PERMIT
 Description: Failure to maintain the short-term firing rate below permitted limits for Heater
 H-A3-4, EPN A3HA34. EIC B18(g)(1) Mod 2D
 Self Report? NO Classification: Moderate
 Citation:

30 TAC Chapter 101, SubChapter A 101.20(3)
 30 TAC Chapter 116, SubChapter B 116.115(c)
 30 TAC Chapter 122, SubChapter B 122.143(4)
 5C THSC Chapter 382 382.085(b)
 FOP O2288 General Terms and Conditions OP
 FOP O2288 Special Condition 19 OP
 NSR 16909 & PSDTX780 Special Condition 1 PERMIT
 NSR 16909 & PSDTX780 Special Condition 4 PERMIT
 Description: Failure to comply with permitted emissions rates for the Cogen Unit 1, EPN
 CG1. EIC B18(g)(1) Mod 2D
 Self Report? NO Classification: Moderate
 Citation:

30 TAC Chapter 116, SubChapter B 116.115(c)
 30 TAC Chapter 122, SubChapter B 122.143(4)
 5C THSC Chapter 382 382.085(b)
 FOP O2288 General Terms and Conditions OP
 FOP O2288 Special Condition 19 OP
 NSR 19823 Special Condition 25F PERMIT
 Description: Failure to maintain wastewater carbon bed Volatile Organic Compounds
 (VOC) concentrations below permitted limits. EIC B19(g)(1) Mod 2D
 Self Report? NO Classification: Moderate
 Citation:

30 TAC Chapter 116, SubChapter B 116.115(c)
 30 TAC Chapter 122, SubChapter B 122.143(4)
 5C THSC Chapter 382 382.085(b)
 FOP O2288 General Terms and Conditions OP
 FOP O2288 Special Condition 19 OP
 NSR 19823 Special Condition 10D PERMIT
 Description: Failure to operate a calorimeter for a flare at least 95% of the time as
 required. EIC B1 Mod 2A
 Self Report? NO Classification: Moderate
 Citation:

30 TAC Chapter 122, SubChapter B 122.143(4)
 30 TAC Chapter 122, SubChapter B 122.145(2)(C)
 5C THSC Chapter 382 382.085(b)
 FOP O2288 General Terms and Conditions OP
 Description: Failure to submit a deviation report on time. EIC B3 Mod 2B

	Self Report?	NO	Classification:	Moderate
	Citation:	30 TAC Chapter 122, SubChapter B 122.143(4) 30 TAC Chapter 122, SubChapter B 122.145(2)(A) 5C THSC Chapter 382 382.085(b) FOP O2288 General Terms and Conditions OP		
	Description:	Failure to report deviations on a deviation report.	EIC B3	MOD 2G
18	Date:	09/30/2021 (1776634)		
	Self Report?	YES	Classification:	Moderate
	Citation:	2D TWC Chapter 26, SubChapter A 26.121(a) 30 TAC Chapter 305, SubChapter F 305.125(1)		
	Description:	Failure to meet the limit for one or more permit parameter		
19	Date:	01/31/2022 (1806297)		
	Self Report?	YES	Classification:	Moderate
	Citation:	2D TWC Chapter 26, SubChapter A 26.121(a) 30 TAC Chapter 305, SubChapter F 305.125(1)		
	Description:	Failure to meet the limit for one or more permit parameter		
20	Date:	02/28/2022 (1813362)		
	Self Report?	YES	Classification:	Moderate
	Citation:	2D TWC Chapter 26, SubChapter A 26.121(a) 30 TAC Chapter 305, SubChapter F 305.125(1)		
	Description:	Failure to meet the limit for one or more permit parameter		
21	Date:	02/28/2022 (1774849)		
	Self Report?	NO	Classification:	Moderate
	Citation:	30 TAC Chapter 116, SubChapter B 116.115(c) 30 TAC Chapter 122, SubChapter B 122.143(4) 5C THSC Chapter 382 382.085(b) FOP O2286 General Terms and Conditions OP FOP O2286 Special Condition 8 OP NSR 20134 SC12 PERMIT		
	Description:	Failure to comply with permit conditions regarding the use of compounds. EIC B18(g)(1) Mod 2D		
22	Date:	03/31/2022 (1819934)		
	Self Report?	YES	Classification:	Moderate
	Citation:	2D TWC Chapter 26, SubChapter A 26.121(a) 30 TAC Chapter 305, SubChapter F 305.125(1)		
	Description:	Failure to meet the limit for one or more permit parameter		
23	Date:	04/01/2022 (1796299)		
	Self Report?	NO	Classification:	Minor
	Citation:	DSPC, Pg. 3, No. 2(a) PERMIT		
	Description:	Failure by Indorama Ventures Propylene Oxides, LLC - Port Neches Operation (Indorama) to calibrate the flow meter at least annually to ensure accuracy.		
	Self Report?	NO	Classification:	Minor
	Citation:	OpR, Pg. 11, No. 1 PERMIT		
	Description:	Failure by Indorama Ventures Propylene Oxides, LLC - Port Neches Operation (Indorama) to properly operate and maintain all systems of collection,		

	treatment, and disposal.		
Self Report?	NO	Classification:	Minor
Citation:	OpR, Pg. 11, No. 1 PERMIT		
Description:	Failure by Indorama Ventures Propylene Oxides, LLC - Port Neches Operation (Indorama) to properly operate and maintain all systems of collection, treatment, and disposal.		
Self Report?	NO	Classification:	Minor
Citation:	OpR, Pg. 11, No. 1 PERMIT		
Description:	Failure by Indorama Ventures Propylene Oxides, LLC - Port Neches Operation (Indorama) to properly operate and maintain all systems of collection, treatment, and disposal.		
Self Report?	NO	Classification:	Minor
Citation:	MRR 7(c) PERMIT		
Description:	Failure by Indorama Ventures Oxides to report any effluent violation that deviates from the permitted effluent limitation by more than 40% in writing to the Regional Office and the Enforcement Division (MC 224) within 5 working days of becoming aware of the noncompliance.		
Self Report?	NO	Classification:	Minor
Citation:	MRR 3(c)(i) PERMIT		
Description:	Failure by Indorama Ventures Oxides (Indorama) to maintain records of monitoring activities.		
Self Report?	NO	Classification:	Minor
Citation:	MRR 3(c)(iii) PERMIT		
Description:	Failure by Indorama Ventures Oxides (Indorama) to maintain records of monitoring activities.		
Self Report?	NO	Classification:	Minor
Citation:	MRR 2(a) PERMIT		
Description:	Failure by Indorama Ventures Oxides to comply with test procedures specified in 30 TAC 319.11 - 319.12.		
Self Report?	NO	Classification:	Minor
Citation:	MRR 2(a) PERMIT		
Description:	Failure by Indorama Ventures Oxides to comply with test procedures specified in 30 TAC 319.11 - 319.12.		
Self Report?	NO	Classification:	Minor
Citation:	MRR 3(c)(vi) PERMIT		
Description:	Failure by Indorama Ventures Oxides to maintain records of monitoring activities.		
Self Report?	NO	Classification:	Minor
Citation:	MRR 3(a) PERMIT		
Description:	Failure by Indorama Ventures Oxides to obtain measurements at times and in a manner so as to be representative of the monitored activity.		
Self Report?	NO	Classification:	Minor
Citation:	MRR 3(c)(vi) PERMIT		
Description:	Failure by Indorama Ventures Oxides to maintain records of monitoring activities.		
Self Report?	NO	Classification:	Minor
Citation:	MRR 2(a) PERMIT		
Description:	Failure by Indorama Ventures Oxides to comply with test procedures 30 TAC 319.11 - 319.12.		
Self Report?	NO	Classification:	Moderate
Citation:	ELMR 3 PERMIT PC 2(d) PERMIT		
Description:	Failure by Indorama Ventures Oxides to take all reasonable steps to prevent a discharge that had a reasonable likelihood of adversely affecting human health or the environment which resulted in the discharge of visible oil.		

Self Report? NO Classification: Minor
Citation: OpR 11(f) PERMIT
Description: Failure by Indorama Ventures Oxides to make records readily available for review by authorized representatives of the TCEQ.

Self Report? NO Classification: Minor
Citation: OpR 1 PERMIT
Description: Failure by Indorama Ventures Oxides to properly operate and maintain units of collection, treatment, and disposal.

Self Report? NO Classification: Minor
Citation: MRR 3(c)(i) PERMIT
Description: Failure by Indorama Ventures Oxides to maintain records of monitoring activities.

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

Self Report? NO Classification: Moderate
Citation: ELMR 1 PERMIT
Description: Failure by Indorama Ventures Oxides to discharge compliant effluent for chemical oxygen demand at Outfall 301.

Self Report? NO Classification: Moderate
Citation: OT 2 PERMIT
Description: Failure by Indorama Ventures Oxides to report orally or by facsimile within 24 hours of becoming aware of the violation and a written report within five working days to the TCEQ Region 10 and the Enforcement Division (MC 224) when exceeding the daily maximum limitation of zinc.

Self Report? NO Classification: Minor
Citation: MRR 3(c)(v) PERMIT
Description: Failure Indorama Ventures Oxides to maintain records of monitoring activities.

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

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

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

27 Date: 07/31/2022 (1848404)
Self Report? YES Classification: Moderate

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

28

Date: 08/10/2022 (1832699)

Self Report? NO Classification: Moderate

Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)
5C THSC Chapter 382 382.085(b)
FOP O2288 GTC OP
FOP O2288 SC 19 OP
NSR 19823 SC 25F PERMIT

Description: Failure to maintain wastewater carbon bed Volatile Organic Compounds (VOC) concentrations below permitted limits. EIC B18(g)(1) Mod 2D

Self Report? NO Classification: Moderate

Citation: 30 TAC Chapter 101, SubChapter A 101.20(3)
30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)
5C THSC Chapter 382 382.085(b)
FOP O2288 GTC OP
FOP O2288 SC 19 OP
NSR 16909 & PSDTX780 SC 1 PERMIT
NSR 16909 & PSDTX780 SC 4 PERMIT

Description: Failure to comply with permitted emissions rates for the Cogen Unit 1, EPN CG1. EIC B18(g)(1) Mod 2D

Self Report? NO Classification: Moderate

Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)
5C THSC Chapter 382 382.085(b)
FOP O2288 GTC OP
FOP O2288 SC 19 OP
NSR 19823 SC 19B PERMIT

Description: Failure to maintain Cooling Tower EPN CT-4 Total Dissolved Solids (TDS) below permitted limits. EIC B18(g)(1) Mod 2D

Self Report? NO Classification: Moderate

Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)
5C THSC Chapter 382 382.085(b)
FOP O2288 GTC OP
FOP O2288 SC 19 OP
NSR 19823 SC 10F PERMIT

Description: Failure to maintain flare heat inputs below the maximum combined limit for the North/Center Flares, EPNs UER044 and UER046, as required. EIC B18(g)(1) Mod 2D

Self Report? NO Classification: Moderate

Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)
5C THSC Chapter 382 382.085(b)
FOP O2288 GTC OP
FOP O2288 SC 19 OP

NSR 19823 SC 10F PERMIT

Description: Failure to maintain flare heat inputs below the maximum limit for the South Flare, EPN UER037, as required. EIC B18(g)(1) Mod 2D

Self Report? NO Classification: Moderate

Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)
5C THSC Chapter 382 382.085(b)
FOP O2288 GTC OP
FOP O2288 SC 19 OP
NSR 19823 SC 1 PERMIT

NSR 19823 SC 13A PERMIT
NSR 19823 SC 8 PERMIT

Description: Failure to comply with permitted emissions rates for the Waste Heat Boiler, EPN A3HA35. EIC B18(g)(1) Mod 2D

Self Report? NO Classification: Moderate

Citation:
30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)
5C THSC Chapter 382 382.085(b)
FOP O2288 GTC OP
FOP O2288 SC 19 OP
NSR 49247 SC 3 PERMIT

Description: Failure to maintain the minimum concentration in the aeration basins as required. EIC B18(g)(1) Mod 2D

Self Report? NO Classification: Moderate

Citation:
30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)
40 CFR Chapter 60, SubChapter C, PT 60, SubPT A 60.18(c)(3)(ii)
5C THSC Chapter 382 382.085(b)
FOP O2288 GTC OP
FOP O2288 SC 19 OP
FOP O2288 SC 1A OP
NSR 19823 SC 10A PERMIT

Description: Failure to maintain the minimum heating value for the South Flare, EPN UER037. EIC B18(g)(1) Mod 2D

Self Report? NO Classification: Moderate

Citation:
30 TAC Chapter 122, SubChapter B 122.143(4)
30 TAC Chapter 122, SubChapter B 122.145(2)(A)
5C THSC Chapter 382 382.085(b)
FOP O2288 GTC OP

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

29 Date: 08/15/2022 (1833534)

Self Report? NO Classification: Moderate

Citation:
30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)
5C THSC Chapter 382 382.085(b)
FOP O1320 SC 16 OP
NSR 5952A SC 14B PERMIT
O1320 GTC OP

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

Self Report? NO Classification: Moderate

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

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

Self Report? NO Classification: Moderate

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

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

30 Date: 08/30/2022 (1833615)

Self Report? NO Classification: Moderate

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

30 TAC Chapter 116, SubChapter B 116.115(c)
 30 TAC Chapter 122, SubChapter B 122.143(4)
 5C THSC Chapter 382 382.085(b)
 NSR 20160 SC 1 PERMIT
 NSR 20160 SC 10A PERMIT
 NSR 20160 SC 10D PERMIT
 O3056 GTC OP
 O3056 SC 17 OP
Description: Failure to comply with permitted emissions rates for Boilers H-K2-001 and H-K2-002, EPN STEAMGEN. EIC B18(g)(1) Mod 2D
Self Report? NO **Classification:** Moderate
Citation:

30 TAC Chapter 116, SubChapter B 116.115(b)(2)(F)
 30 TAC Chapter 116, SubChapter B 116.115(c)
 30 TAC Chapter 122, SubChapter B 122.143(4)
 5C THSC Chapter 382 382.085(b)
 FOP O3056 GTC OP
 FOP O3056 SC 17 OP
 NSR 20160 SC 1 PERMIT
 NSR 20160 SC 12E PERMIT
 SC 12B PERMIT
Description: Failure to comply with permitted emissions rates for Boiler H-K2-003, EPN HK-F5-003. EIC B18(g)(1) Mod 2D
Self Report? NO **Classification:** Moderate
Citation:

30 TAC Chapter 116, SubChapter B 116.115(c)
 30 TAC Chapter 122, SubChapter B 122.143(4)
 5C THSC Chapter 382 382.085(b)
 FOP O3056 GTC OP
 FOP O3056 SC 17 OP
 NSR 20160 SC 14A PERMIT
 NSR 20160 SC 14I PERMIT
Description: Failure to comply with permitted emissions rates for Boiler H-K2-004, EPN HK-F5-004. EIC B18(g)(1) Mod 2D
Self Report? NO **Classification:** Moderate
Citation:

30 TAC Chapter 116, SubChapter B 116.115(c)
 30 TAC Chapter 122, SubChapter B 122.143(4)
 40 CFR Chapter 60, SubChapter C, PT 60, SubPT Kb 60.113b(a)(2)
 5C THSC Chapter 382 382.085(b)
 FOP O3056 GTC OP
 FOP O3056 SC 17 OP
 FOP O3056 SC 1A OP
 NSR 20160 SC 30B PERMIT
Description: Failure to conduct an annual inspection on a floating roof tank as required. EIC B18(g)(1) Mod 2D
Self Report? NO **Classification:** Moderate
Citation:

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

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

30 TAC Chapter 101, SubChapter F 101.201(b)(2)
 30 TAC Chapter 116, SubChapter B 116.115(c)
 30 TAC Chapter 122, SubChapter B 122.143(4)

5C THSC Chapter 382 382.085(b)
FOP O3056 GTC OP
FOP O3056 SC 17 OP
FOP O3056 SC 2F OP
NSR 20160 GTC 9 PERMIT

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

- 31 Date: 08/31/2022 (1856200)
Self Report? YES Classification: Moderate
Citation:
2D TWC Chapter 26, SubChapter A 26.121(a)
30 TAC Chapter 305, SubChapter F 305.125(1)
Description: Failure to meet the limit for one or more permit parameter
- 32 Date: 09/30/2022 (1862558)
Self Report? YES Classification: Moderate
Citation:
2D TWC Chapter 26, SubChapter A 26.121(a)
30 TAC Chapter 305, SubChapter F 305.125(1)
Description: Failure to meet the limit for one or more permit parameter
- 33 Date: 12/31/2022 (1882142)
Self Report? YES Classification: Moderate
Citation:
2D TWC Chapter 26, SubChapter A 26.121(a)
30 TAC Chapter 305, SubChapter F 305.125(1)
Description: Failure to meet the limit for one or more permit parameter
- 34 Date: 01/31/2023 (1889959)
Self Report? YES Classification: Moderate
Citation:
2D TWC Chapter 26, SubChapter A 26.121(a)
30 TAC Chapter 305, SubChapter F 305.125(1)
Description: Failure to meet the limit for one or more permit parameter
- 35 Date: 02/28/2023 (1898516)
Self Report? YES Classification: Moderate
Citation:
2D TWC Chapter 26, SubChapter A 26.121(a)
30 TAC Chapter 305, SubChapter F 305.125(1)
Description: Failure to meet the limit for one or more permit parameter
- 36 Date: 03/31/2023 (1905305)
Self Report? YES Classification: Moderate
Citation:
2D TWC Chapter 26, SubChapter A 26.121(a)
30 TAC Chapter 305, SubChapter F 305.125(1)
Description: Failure to meet the limit for one or more permit parameter
- 37 Date: 04/30/2023 (1912490)
Self Report? YES Classification: Moderate
Citation:
2D TWC Chapter 26, SubChapter A 26.121(a)
30 TAC Chapter 305, SubChapter F 305.125(1)
Description: Failure to meet the limit for one or more permit parameter
- 38 Date: 06/30/2023 (1926055)

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

39 Date: 07/31/2023 (1933020)

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

40 Date: 08/21/2023 (1918521)

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)
NSR 20160 SC 19F PERMIT
O3056 GTC OP
O3056 SC 17 OP
Description: Failure to conduct weekly pressure testing on disc integrity as required. EIC
B1 Mod 2A

Self Report? NO Classification: Moderate
Citation:
30 TAC Chapter 116, SubChapter B 116.115(b)(2)(F)
30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)
5C THSC Chapter 382 382.085(b)
NSR 20160 SC 1 PERMIT
NSR 20160 SC 10D PERMIT
O3056 GTC OP
O3056 SC 17 OP
Description: Failure to comply with permitted emissions rates for Boilers H-K2-001 and
H-K2-002, EPN STEAMGEN. EIC B18(g)(1) Mod 2D

Self Report? NO Classification: Moderate
Citation:
30 TAC Chapter 116, SubChapter B 116.115(b)(2)(F)
30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)
5C THSC Chapter 382 382.085(b)
FOP O3056 GTC OP
FOP O3056 SC 17 OP
NSR 20160 SC 1 PERMIT
NSR 20160 SC 12E PERMIT
Description: Failure to comply with permitted emissions rates for Boiler H-K2-003, EPN
HK-F5-003. EIC B18(g)(1) Mod 2D

41 Date: 08/23/2023 (1918831)

Self Report? NO Classification: Moderate
Citation:
30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)
5C THSC Chapter 382 382.085(b)
FOP O2288 GTC OP
FOP O2288 SC 19 OP
NSR 19823 SC 1 PERMIT
NSR 19823 SC 13 PERMIT
NSR 19823 SC 9 PERMIT
Description: Failure to comply with permitted limits for the Waste Heat Boiler, Emission
Point Number (EPN) A3HA35. EIC B18(g)(1) Mod 2D

Self Report? NO Classification: Moderate
Citation:
30 TAC Chapter 101, SubChapter A 101.20(3)

30 TAC Chapter 116, SubChapter B 116.115(c)
 30 TAC Chapter 122, SubChapter B 122.143(4)
 5C THSC Chapter 382 382.085(b)
 FOP O2288 GTC OP
 FOP O2288 SC 19 OP
 NSR 16909 & PSDTX780 SC 7B PERMIT
 Description: Failure to comply with permitted emissions rates for Boiler HK-11, EPN UEHK11. EIC B18(g)(1) Mod 2D
 Self Report? NO Classification: Moderate
 Citation:

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

30 TAC Chapter 116, SubChapter B 116.115(c)
 30 TAC Chapter 122, SubChapter B 122.143(4)
 5C THSC Chapter 382 382.085(b)
 FOP O2288 GTC OP
 FOP O2288 SC 19 OP
 NSR 19823 SC 10F PERMIT
 Description: Failure to maintain the maximum heat input for the South Flare, EPN UER037, as required. EIC B18(g)(1) Mod 2D
 Self Report? NO Classification: Moderate
 Citation:

30 TAC Chapter 116, SubChapter B 116.115(c)
 30 TAC Chapter 122, SubChapter B 122.143(4)
 5C THSC Chapter 382 382.085(b)
 FOP O2288 GTC OP
 FOP O2288 SC 19 OP
 NSR 49247 SC 3 PERMIT
 Description: Failure to maintain the minimum concentration in the aeration basins as required. EIC B18(g)(1) Mod 2D
 Self Report? NO Classification: Moderate
 Citation:

30 TAC Chapter 116, SubChapter B 116.115(c)
 30 TAC Chapter 122, SubChapter B 122.143(4)
 5C THSC Chapter 382 382.085(b)
 FOP O2288 GTC OP
 FOP O2288 SC 19 OP
 NSR 19823 SC 8 PERMIT
 Description: Failure to maintain the short-term firing rate below permitted limits for Heater H-A3-3, EPN A3HA33. EIC B18(g)(1) Mod 2D
 Self Report? NO Classification: Moderate
 Citation:

30 TAC Chapter 122, SubChapter B 122.143(4)
 30 TAC Chapter 122, SubChapter B 122.145(2)(A)
 5C THSC Chapter 382 382.085(b)
 FOP O2288 General Terms and Conditions OP
 Description: Failure to report deviations on a deviation report. EIC B3 MOD 2G

42 Date: 08/25/2023 (1918834)
 Self Report? NO Classification: Moderate
 Citation:

30 TAC Chapter 116, SubChapter B 116.115(c)
 30 TAC Chapter 122, SubChapter B 122.143(4)
 5C THSC Chapter 382 382.085(b)
 FOP O1320 GTC OP
 FOP O1320 SC 16 OP
 NSR 5952A SC 14B PERMIT
 Description: Failure to maintain the F6 Incinerator within the permitted temperature limit as required. EIC B18(g)(1) Mod 2D

Self Report? NO Classification: Moderate
Citation: 30 TAC Chapter 101, SubChapter A 101.20(2)
30 TAC Chapter 113, SubChapter C 113.120
30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT G 63.114(d)(2)
5C THSC Chapter 382 382.085(b)
FOP O1320 GTC OP
FOP O1320 SC 16 OP
NSR 5952A SC 4C PERMIT
NSR 5972A SC 8 PERMIT
Description: Failure to secure valves on bypass lines with a car seal as required. EIC
B18(g)(1) Mod 2D

Self Report? NO Classification: Moderate
Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)
5C THSC Chapter 382 382.085(b)
FOP O1320 GTC OP
FOP O1320 SC 16 OP
NSR 5972A SC 4 PERMIT
Description: Failure to maintain the F4 Incinerator within the permitted temperature limit
as required. EIC B18(g)(1) Mod 2D

Self Report? NO Classification: Moderate
Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)
5C THSC Chapter 382 382.085(b)
FOP O1320 GTC OP
FOP O1320 SC 16 OP
NSR 36646 SC 12C PERMIT
Description: Failure to conduct total dissolved solids (TDS) sampling on cooling towers as
required. EIC B1 Mod 2A

Self Report? NO Classification: Moderate
Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)
5C THSC Chapter 382 382.085(b)
FOP O1320 GTC OP
FOP O1320 SC 16 OP
NSR 5952A SC 14C PERMIT
Description: Failure to monitor and record the F6 Incinerator firebox temperature as
required. EIC EIC B1 Mod 2A

Self Report? NO Classification: Moderate
Citation: 30 TAC Chapter 122, SubChapter B 122.143(4)
30 TAC Chapter 122, SubChapter B 122.145(2)(A)
5C THSC Chapter 382 382.085(b)
FOP O1320 GTC OP
Description: Failure to report deviations on a deviation report. EIC B3 MOD 2G

43 Date: 08/31/2023 (1939154)
Self Report? YES Classification: Moderate
Citation: 2D TWC Chapter 26, SubChapter A 26.121(a)
30 TAC Chapter 305, SubChapter F 305.125(1)
Description: Failure to meet the limit for one or more permit parameter

44 Date: 09/30/2023 (1946006)
Self Report? YES Classification: Moderate
Citation: 2D TWC Chapter 26, SubChapter A 26.121(a)
30 TAC Chapter 305, SubChapter F 305.125(1)
Description: Failure to meet the limit for one or more permit parameter

45 Date: 10/31/2023 (1951698)
Self Report? YES Classification: Moderate
Citation:
2D TWC Chapter 26, SubChapter A 26.121(a)
30 TAC Chapter 305, SubChapter F 305.125(1)
Description: Failure to meet the limit for one or more permit parameter

46 Date: 11/30/2023 (1961460)
Self Report? YES Classification: Moderate
Citation:
2D TWC Chapter 26, SubChapter A 26.121(a)
30 TAC Chapter 305, SubChapter F 305.125(1)
Description: Failure to meet the limit for one or more permit parameter

47 Date: 12/08/2023 (1925974)
Self Report? NO Classification: Moderate
Citation:
30 TAC Chapter 305, SubChapter F 305.125(1)
40 CFR Chapter 264, SubChapter I, PT 264, SubPT C 264.31
Description: Failure to operate a facility in such a manner to minimize the possibility of any unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents to air, soil, or surface water which could threaten human health or the environment.

48 Date: 12/31/2023 (1968056)
Self Report? YES Classification: Moderate
Citation:
2D TWC Chapter 26, SubChapter A 26.121(a)
30 TAC Chapter 305, SubChapter F 305.125(1)
Description: Failure to meet the limit for one or more permit parameter

49 Date: 01/31/2024 (1977119)
Self Report? YES Classification: Moderate
Citation:
2D TWC Chapter 26, SubChapter A 26.121(a)
30 TAC Chapter 305, SubChapter F 305.125(1)
Description: Failure to meet the limit for one or more permit parameter

50 Date: 02/07/2024 (1955333)
Self Report? NO Classification: Minor
Citation:
OpR, Pg. 11, No. 1 PERMIT
Description: Failure by Indorama Ventures Propylene Oxides, LLC - Port Neches Operation (Indorama) to properly operate and maintain all systems of collection, treatment, and disposal.
Self Report? NO Classification: Minor
Citation:
OpR 1 PERMIT
Description: Failure by Indorama Ventures Oxides to properly operate and maintain units of collection, treatment, and disposal.
Self Report? NO Classification: Minor
Citation:
30 TAC Chapter 305, SubChapter F 305.125(1)
MRR, Pg. 6, No. 5 PERMIT
Description: Failure by Indorama Ventures Oxides (Indorama) to accurately calibrate the flow meter as often as necessary to ensure accuracy but not less than annually.
Self Report? NO Classification: Minor
Citation:
30 TAC Chapter 305, SubChapter F 305.125(1)
30 TAC Chapter 305, SubChapter F 305.125(5)

OPR Pg. 11, No. 1 PERMIT

Description: Failure by Indorama Ventures Oxides (Indorama) to properly operate and maintain units of collection, treatment, and disposal.

Self Report? NO Classification: Minor

Citation:
30 TAC Chapter 305, SubChapter F 305.125(1)
30 TAC Chapter 305, SubChapter F 305.125(19)
PC Pg. 7, No. 1(a) PERMIT

Description: Failure by Indorama Ventures Oxides (Indorama) to properly report results on the Discharge Monitoring Reports (DMR).

Self Report? NO Classification: Minor

Citation:
30 TAC Chapter 305, SubChapter F 305.125(1)
30 TAC Chapter 305, SubChapter F 305.125(19)
PC Pg. 7, No. 1(a) PERMIT

Description: Failure by Indorama Ventures Oxides (Indorama) to properly report results on the Discharge Monitoring Reports (DMR).

Self Report? NO Classification: Moderate

Citation:
2D TWC Chapter 26, SubChapter A 26.121(a)(1)
30 TAC Chapter 305, SubChapter F 305.125(1)
PC Pg. 8, No. 2(g) PERMIT

Description: Failure by Indorama Ventures Oxides (Indorama) to prevent Unauthorized Discharges (UDs) into or adjacent to the waters of the state at any location not permitted as an outfall.

Self Report? NO Classification: Minor

Citation:
30 TAC Chapter 305, SubChapter F 305.125(1)
MRR Pg. 6, No. 7(C) PERMIT

Description: Failure by Indorama Ventures Oxides (Indorama) (City) to submit a report for effluent violations that deviated from the permitted effluent limitation by more than 40% in writing to the Regional Office and the Enforcement Division (MC 224) within 5 working days of becoming aware of the noncompliance.

Self Report? NO Classification: Minor

Citation:
30 TAC Chapter 305, SubChapter F 305.125(1)
30 TAC Chapter 305, SubChapter F 305.125(5)
OPR Pg. 11, No. 1 PERMIT

Description: Failure by Indorama Ventures Oxides (Indorama) to properly operate and maintain units of collection, treatment, and disposal.

51 Date: 02/29/2024 (1983684)

Self Report? YES Classification: Moderate

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

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

52 Date: 03/31/2024 (1990214)

Self Report? YES Classification: Moderate

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

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

53 Date: 05/31/2024 (2003621)

Self Report? YES Classification: Moderate

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

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

54 Date: 06/30/2024 (2011175)

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

55 Date: 07/03/2024 (1988158)

Self Report? NO Classification: Moderate
Citation: 30 TAC Chapter 101, SubChapter A 101.20(3)
30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)
5C THSC Chapter 382 382.085(b)
FOP O2288 GTC OP
FOP O2288 SC 19 OP
NSR 16909 & PSDTX780 SC 1 PERMIT
NSR 16909 & PSDTX780 SC 7A PERMIT
NSR 16909 & PSDTX780 SC 7B PERMIT
Description: Failure to comply with permitted emissions rates for Boiler HK-11, EPN
UEHK11. EIC B18(g)(1) Mod 2D

Self Report? NO Classification: Moderate
Citation: 30 TAC Chapter 101, SubChapter A 101.20(3)
30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)
5C THSC Chapter 382 382.085(b)
FOP O2288 GTC OP
FOP O2288 SC 19 OP
NSR 16909 & PSDTX780 SC4 PERMIT
Description: Failure to comply with permitted emissions rates for the Cogen Unit 1, EPN
CG1. EIC B18(g)(1) Mod 2D

Self Report? NO Classification: Moderate
Citation: 30 TAC Chapter 101, SubChapter A 101.20(3)
30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)
5C THSC Chapter 382 382.085(b)
FOP O2288 GTC OP
FOP O2288 SC 19 OP
NSR 16909 & PSDTX780 SC4 PERMIT
Description: Failure to comply with permitted emissions rates for the Cogen Unit 2, EPN
CG2. EIC B18(g)(1) Mod 2D

Self Report? NO Classification: Moderate
Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)
5C THSC Chapter 382 382.085(b)
FOP O2288 GTC OP
FOP O2288 SC 19 OP
NSR 19823 SC 1 PERMIT
NSR 19823 SC 13 PERMIT
Description: Failure to comply with permitted limits for the Waste Heat Boiler H-A3-5, EPN
A3HA35. EIC B18(g)(1) Mod 2D

Self Report? NO Classification: Moderate
Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)
5C THSC Chapter 382 382.085(b)
FOP O2288 GTC OP
FOP O2288 SC 19 OP
NSR 49247 SC 3 PERMIT
Description: Failure to maintain the minimum concentration in the aeration basins as
required. EIC B18(g)(1) Mod 2D

Self Report? NO Classification: Moderate
Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)
5C THSC Chapter 382 382.085(b)

FOP O2288 GTC OP
 FOP O2288 SC 19 OP
 NSR 19823 SC 10F PERMIT
 Description: Failure to maintain flare heat inputs below the maximum limit for the South Flare, EPN UER037, as required. EIC B18(g)(1) Mod 2D
 Self Report? NO Classification: Moderate
 Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
 30 TAC Chapter 122, SubChapter B 122.143(4)
 5C THSC Chapter 382 382.085(b)
 FOP O2288 GTC OP
 FOP O2288 SC 19 OP
 NSR 19823 SC 10F PERMIT
 Description: Failure to maintain flare heat inputs below the maximum combined limit for the North/Center Flares, EPNs UER044 and UER046, as required. EIC B18(g)(1) Mod 2D
 Self Report? NO Classification: Moderate
 Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
 30 TAC Chapter 122, SubChapter B 122.143(4)
 40 CFR Chapter 60, SubChapter C, PT 60, SubPT A 60.18(c)(1)
 5C THSC Chapter 382 382.085(b)
 FOP O2288 GTC OP
 FOP O2288 SC 19 OP
 NSR 19823 SC 10C PERMIT
 Description: Failure to operate a flare with no visible emissions present except for periods not to exceed a total of 5 minutes during any 2 consecutive hours. EIC B18(g)(1) Mod 2D
 Self Report? NO Classification: Moderate
 Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
 30 TAC Chapter 122, SubChapter B 122.143(4)
 5C THSC Chapter 382 382.085(b)
 FOP O2288 GTC OP
 FOP O2288 SC 19 OP
 NSR 19823 SC 25F PERMIT
 Description: Failure to maintain wastewater carbon bed Volatile Organic Compounds (VOC) concentrations below permitted limits. EIC B18(g)(1) Mod 2D

56 Date: 07/09/2024 (1995475)
 Self Report? NO Classification: Moderate
 Citation: 30 TAC Chapter 113, SubChapter C 113.120
 30 TAC Chapter 116, SubChapter B 116.115(c)
 30 TAC Chapter 122, SubChapter B 122.143(4)
 40 CFR Chapter 63, SubChapter C, PT 63, SubPT G 63.114(a)(1)
 5C THSC Chapter 382 382.085(b)
 FOP O1320 GTC OP
 FOP O1320 SC 1 OP
 FOP O1320 SC 16 OP
 NSR 5952A SC 14C PERMIT
 Description: Failure to monitor and record the F6 Incinerator firebox temperature as required. EIC EIC B1 Mod 2A

57 Date: 07/31/2024 (2016779)
 Self Report? YES Classification: Moderate
 Citation: 2D TWC Chapter 26, SubChapter A 26.121(a)
 30 TAC Chapter 305, SubChapter F 305.125(1)
 Description: Failure to meet the limit for one or more permit parameter

58 Date: 08/06/2024 (2001549)
 Self Report? NO Classification: Moderate
 Citation: 30 TAC Chapter 116, SubChapter B 116.115(b)(2)(F)

30 TAC Chapter 116, SubChapter B 116.115(c)
 30 TAC Chapter 122, SubChapter B 122.143(4)
 5C THSC Chapter 382 382.085(b)
 NSR 20160 SC 1 PERMIT
 NSR 20160 SC 10A PERMIT
 NSR 20160 SC 10D PERMIT
 O3056 GTC OP
 O3056 SC 17 OP
 Description: Failure to comply with permitted emissions rates for Boilers H-K2-001 and H-K2-002, EPN STEAMGEN. EIC B18(g)(1) Mod 2D
 Self Report? NO Classification: Moderate
 Citation:

30 TAC Chapter 116, SubChapter B 116.115(c)
 30 TAC Chapter 122, SubChapter B 122.143(4)
 5C THSC Chapter 382 382.085(b)
 NSR 20160 SC 14A PERMIT
 NSR 20160 SC 14B PERMIT
 NSR 20160 SC 14I PERMIT
 O3056 GTC OP
 O3056 SC 17 OP
 Description: Failure to comply with permitted emissions rates for Boiler H-K2-004, EPN HK-F5-004. EIC B18(g)(1) Mod 2D
 Self Report? NO Classification: Moderate
 Citation:

30 TAC Chapter 116, SubChapter B 116.115(b)(2)(F)
 30 TAC Chapter 116, SubChapter B 116.115(c)
 30 TAC Chapter 122, SubChapter B 122.143(4)
 5C THSC Chapter 382 382.085(b)
 FOP O3056 GTC OP
 FOP O3056 SC 17 OP
 NSR 20160 SC 1 PERMIT
 NSR 20160 SC 12E PERMIT
 Description: Failure to comply with permitted emissions rates for Boiler H-K2-003, EPN HK-F5-003. EIC B18(g)(1) Mod 2D
 Self Report? NO Classification: Moderate
 Citation:

30 TAC Chapter 116, SubChapter B 116.115(c)
 30 TAC Chapter 122, SubChapter B 122.143(4)
 5C THSC Chapter 382 382.085(b)
 FOP O3056 GTC OP
 FOP O3056 SC 17 OP
 Description: NSR 20160 SC 17C PERMIT
 Failure to operate a flare with no visible emissions present except for periods not to exceed a total of 5 minutes during any 2 consecutive hours. EIC B18(g)(1) Mod 2D

59 Date: 08/31/2024 (2023796)
 Self Report? YES Classification: Moderate
 Citation:

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

60* Date: 09/30/2024 (2029920)
 Self Report? YES Classification: Moderate
 Citation:

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

61* Date: 10/28/2024 (2015870)
 Self Report? NO Classification: Moderate
 Citation:

30 TAC Chapter 334, SubChapter C 334.48(g)(1)(B)
 Description: Failure to conduct triennial overfill prevention equipment inspection. B1/Mod

Self Report? NO Classification: Moderate
 Citation: 30 TAC Chapter 334, SubChapter H 334.48(h)(1)(B)
 Description: Failure to conduct annual walkthrough inspections for under dispenser areas that do not have containment sumps. B1/Mod
 Self Report? NO Classification: Moderate
 Citation: 30 TAC Chapter 334, SubChapter C 334.48(g)(1)(A)(ii)
 Description: Failure to conduct triennial testing of spill buckets. B1/Mod

62* Date: 10/31/2024 (2036241)
 Self Report? YES Classification: Moderate
 Citation: 2D TWC Chapter 26, SubChapter A 26.121(a)
 30 TAC Chapter 305, SubChapter F 305.125(1)
 Description: Failure to meet the limit for one or more permit parameter

63* Date: 02/14/2025 (2041400)
 Self Report? NO Classification: Moderate
 Citation: 30 TAC Chapter 334, SubChapter C 334.48(g)(1)(B)
 Description: Failure to conduct triennial overfill prevention equipment inspection. B1/Mod
 Self Report? NO Classification: Moderate
 Citation: 30 TAC Chapter 334, SubChapter H 334.48(h)(1)(B)
 Description: Failure to conduct annual walkthrough inspections for under dispenser areas that do not have containment sumps. B1/Mod
 Self Report? NO Classification: Moderate
 Citation: 30 TAC Chapter 334, SubChapter C 334.48(g)(1)(A)(ii)
 Description: Failure to conduct triennial testing of spill buckets. B1/Mod

64* Date: 02/28/2025 (2065313)
 Self Report? YES Classification: Moderate
 Citation: 2D TWC Chapter 26, SubChapter A 26.121(a)
 30 TAC Chapter 305, SubChapter F 305.125(1)
 Description: Failure to meet the limit for one or more permit parameter

65* Date: 04/30/2025 (2078517)
 Self Report? YES Classification: Moderate
 Citation: 2D TWC Chapter 26, SubChapter A 26.121(a)
 30 TAC Chapter 305, SubChapter F 305.125(1)
 Description: Failure to meet the limit for one or more permit parameter

66* Date: 05/31/2025 (2085608)
 Self Report? YES Classification: Moderate
 Citation: 2D TWC Chapter 26, SubChapter A 26.121(a)
 30 TAC Chapter 305, SubChapter F 305.125(1)
 Description: Failure to meet the limit for one or more permit parameter

67* Date: 06/16/2025 (2071403)
 Self Report? NO Classification: Moderate
 Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
 30 TAC Chapter 122, SubChapter B 122.143(4)
 5C THSC Chapter 382 382.085(b)
 FOP O1320 GTC OP

FOP O1320 SC 16 OP
 NSR 5952A SC 14B PERMIT
 Description: Failure to maintain the F6 Incinerator within the permitted temperature limit as required. EIC B18(g)(1) Mod 2D
 Self Report? NO Classification: Moderate
 Citation: FOP O1320 SC 16 OP
 30 TAC Chapter 116, SubChapter B 116.115(c)
 30 TAC Chapter 122, SubChapter B 122.143(4)
 5C THSC Chapter 382 382.085(b)
 FOP O1320 GTC OP
 NSR 5952A SC 10 PERMIT
 Description: Failure to maintain Ethylene Oxide in the F6 Wastewater Conveyance below permitted limits as required. EIC B18(g)(1) Mod 2D

68* Date: 06/30/2025 (2092717)
 Self Report? YES Classification: Moderate
 Citation: 2D TWC Chapter 26, SubChapter A 26.121(a)
 30 TAC Chapter 305, SubChapter F 305.125(1)
 Description: Failure to meet the limit for one or more permit parameter

69* Date: 07/31/2025 (2099297)
 Self Report? YES Classification: Moderate
 Citation: 2D TWC Chapter 26, SubChapter A 26.121(a)
 30 TAC Chapter 305, SubChapter F 305.125(1)
 Description: Failure to meet the limit for one or more permit parameter

70* Date: 08/08/2025 (2084627)
 Self Report? NO Classification: Moderate
 Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
 30 TAC Chapter 122, SubChapter B 122.143(4)
 5C THSC Chapter 382 382.085(b)
 FOP O3056 GTC OP
 FOP O3056 STC 18 OP
 NSR 20160 SC 14A PERMIT
 NSR 20160 SC 14I PERMIT
 NSR 20160 SC 17 PERMIT
 NSR 20160 SC 17B PERMIT
 NSR 83816 SC 11A(i) (MSS) PERMIT
 Description: Failure to comply with permitted emissions rates for Boiler H-K2-004, EPN HK-F5-004. EIC B18(g)(1) Mod 2D
 Self Report? NO Classification: Moderate
 Citation: 30 TAC Chapter 115, SubChapter D 115.354
 30 TAC Chapter 116, SubChapter B 116.115(c)
 30 TAC Chapter 122, SubChapter B 122.143(4)
 40 CFR Chapter 264, SubChapter I, PT 264, SubPT BB 264.1050
 40 CFR Chapter 60, SubChapter C, PT 60, SubPT VV 60.480
 40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.160
 5C THSC Chapter 382 382.085(b)
 FOP O3056 GTC OP
 FOP O3056 STC 18 PERMIT
 FOP O3056 STC 1A OP
 NSR 20160 SC 21 PERMIT
 NSR 20160 SC 4D PERMIT
 NSR 20160 SC 5D PERMIT
 Description: Failure to add components in VOC and organic hazardous air pollutant (HAP) service to Leak Detection and Repair (LDAR) program and monitor them as required. EIC B18g(9) Mod 2A
 Self Report? NO Classification: Moderate
 Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
 30 TAC Chapter 122, SubChapter B 122.143(4)

40 CFR Chapter 63, SubChapter C, PT 63, SubPT EEE 63.1206(c)(7)(i)
5C THSC Chapter 382 382.085(b)
NSR 20160 SC 5F PERMIT
O3056 GTC OP
O3056 STC 18 OP
O3056 STC 1A OP

Description: Failure to perform calibrations according to the operation and maintenance plan for Hazardous Waste Combustors as required. EIC B1 Mod 2A

Self Report? NO Classification: Minor

Citation:

30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)
40 CFR Part 60, Subpart VV 60.482-2
40 CFR Part 60, Subpart VV 60.482-7
5C THSC Chapter 382 382.085(b)
FOP O3056 GTC OP
FOP O3056 STC 18 OP
FOP O3056 STC 1A OP
NSR 20160 SC 4D PERMIT

Description: Failure to monitor LDAR components as required. EIC B1 Minor 3A

Self Report? NO Classification: Minor

Citation:

30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)
5C THSC Chapter 382 382.085(b)
FOP O3056 GTC OP
FOP O3056 STC 18 OP
NSR 20160 SC 21E PERMIT
NSR 20160 SC 21F PERMIT

Description: Failure to maintain weekly audio, visual, and olfactory (AVO) records as required. EIC C3 Minor 3C

Self Report? NO Classification: Moderate

Citation:

30 TAC Chapter 122, SubChapter B 122.143(4)
30 TAC Chapter 122, SubChapter B 122.145(2)(A)
FOP O3056 GTC OP

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

71* Date: 08/28/2025 (2083016)

Self Report? NO Classification: Moderate

Citation:

30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)
40 CFR Chapter 60, SubChapter C, PT 60, SubPT A 60.18(c)(2)
5C THSC Chapter 382 382.085(b)
FOP O2287 GTC OP
FOP O2287 STC 11 OP
NSR 647B SC 5B PERMIT

Description: Failure to operate a flare with a flame present at all times. EIC B18(g)(1) Mod 2D

Self Report? NO Classification: Moderate

Citation:

30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)
5C THSC Chapter 382 382.085(b)
FOP O2287 GTC OP
FOP O2287 STC 11 OP
NSR 5807A SC 1 PERMIT

Description: Failure to comply with permitted emissions rates for E4 Unit Tank Car Loading, EPN E4LREAW. EIC B18(g)(1) Mod 2D

Self Report? NO Classification: Moderate

Citation:

30 TAC Chapter 116, SubChapter B 116.115(b)(2)(E)
30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)
5C THSC Chapter 382 382.085(b)
FOP O2287 GTC OP

FOP O2287 STC 11 OP
 NSR 647B SC 19 PERMIT
 Description: Failure to demonstrate compliance with the operating parameters for the E7 Loading Scrubber, EPN E7TTLOAD. EIC B18(g)(1) Mod 2D
 Self Report? NO Classification: Moderate
 Citation:
 30 TAC Chapter 122, SubChapter B 122.143(4)
 30 TAC Chapter 122, SubChapter B 122.145(2)(A)
 5C THSC Chapter 382 382.085(b)
 FOP O2287 GTC OP
 Description: Failure to report deviations on a deviation report. EIC B3 MOD 2G

72* Date: 08/28/2025 (2089602)
 Self Report? NO Classification: Moderate
 Citation:
 30 TAC Chapter 116, SubChapter B 116.115(c)
 30 TAC Chapter 122, SubChapter B 122.143(4)
 5C THSC Chapter 382 382.085(b)
 FOP O2288 GTC OP
 FOP O2288 SC 19 OP
 NSR 19823 SC 25F PERMIT
 Description: Failure to maintain wastewater carbon bed Volatile Organic Compounds (VOC) concentrations below permitted limits. EIC B18(g)(1) Mod 2D
 Self Report? NO Classification: Moderate
 Citation:
 30 TAC Chapter 116, SubChapter B 116.115(c)
 30 TAC Chapter 122, SubChapter B 122.143(4)
 5C THSC Chapter 382 382.085(b)
 FOP O2288 GTC OP
 FOP O2288 SC 19 OP
 NSR 19823 SC 1 PERMIT
 NSR 19823 SC 13A PERMIT
 Description: Failure to comply with permitted limits for the Waste Heat Boiler H-A3-5, EPN A3HA35. EIC B18(g)(1) Mod 2D
 Self Report? NO Classification: Moderate
 Citation:
 30 TAC Chapter 116, SubChapter B 116.115(c)
 30 TAC Chapter 122, SubChapter B 122.143(4)
 40 CFR Chapter 60, SubChapter C, PT 60, SubPT A 60.18(c)(3)(ii)
 5C THSC Chapter 382 382.085(b)
 FOP O2288 GTC OP
 FOP O2288 SC 19 OP
 FOP O2288 SC 1A OP
 NSR 19823 SC 10A PERMIT
 Description: Failure to maintain the minimum heating value for the South Flare, EPN UER037. EIC B18(g)(1) Mod 2D
 Self Report? NO Classification: Moderate
 Citation:
 30 TAC Chapter 116, SubChapter B 116.115(c)
 30 TAC Chapter 122, SubChapter B 122.143(4)
 40 CFR Chapter 60, SubChapter C, PT 60, SubPT A 60.18(c)(3)(ii)
 5C THSC Chapter 382 382.085(b)
 FOP O2288 GTC OP
 FOP O2288 SC 19 OP
 FOP O2288 SC 1A OP
 NSR 19823 SC 10A PERMIT
 Description: Failure to maintain the minimum heating value for the North Flare, EPN UER044. EIC B18(g)(1) Mod 2D
 Self Report? NO Classification: Moderate
 Citation:
 30 TAC Chapter 116, SubChapter B 116.115(c)
 30 TAC Chapter 122, SubChapter B 122.143(4)
 40 CFR Chapter 60, SubChapter C, PT 60, SubPT A 60.18(c)(3)(ii)
 5C THSC Chapter 382 382.085(b)
 FOP O2288 GTC OP
 FOP O2288 SC 19 OP

FOP O2288 SC 1A OP
 NSR 19823 SC 10A PERMIT
 Description: Failure to maintain the minimum heating value for the Center Flare, EPN UER046. EIC B18(g)(1) Mod 2D
 Self Report? NO Classification: Moderate
 Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
 30 TAC Chapter 122, SubChapter B 122.143(4)
 5C THSC Chapter 382 382.085(b)
 FOP O2288 GTC OP
 FOP O2288 SC 19 OP
 NSR 19823 SC 10F PERMIT
 Description: Failure to maintain flare heat inputs below the maximum limit for the South Flare, EPN UER037, as required. EIC B18(g)(1) Mod 2D
 Self Report? NO Classification: Moderate
 Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
 30 TAC Chapter 122, SubChapter B 122.143(4)
 5C THSC Chapter 382 382.085(b)
 FOP O2288 GTC OP
 FOP O2288 SC 19 OP
 NSR 19823 SC 10F PERMIT
 Description: Failure to maintain flare heat inputs below the maximum combined limit for the North/Center Flares, EPNs UER044 and UER046, as required. EIC B18(g)(1) Mod 2D
 Self Report? NO Classification: Moderate
 Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
 30 TAC Chapter 122, SubChapter B 122.143(4)
 40 CFR Chapter 60, SubChapter C, PT 60, SubPT A 60.18(c)(1)
 5C THSC Chapter 382 382.085(b)
 FOP O2288 GTC OP
 FOP O2288 SC 19 OP
 NSR 19823 SC 10C PERMIT
 Description: Failure to operate a flare with no visible emissions present except for periods not to exceed a total of 5 minutes during any 2 consecutive hours. EIC B18(g)(1) Mod 2D
 Self Report? NO Classification: Moderate
 Citation: 30 TAC Chapter 101, SubChapter A 101.20(3)
 30 TAC Chapter 116, SubChapter B 116.115(c)
 30 TAC Chapter 122, SubChapter B 122.143(4)
 5C THSC Chapter 382 382.085(b)
 FOP O2288 GTC OP
 FOP O2288 SC 19 OP
 NSR 16909 & PSDTX780 SC 1 PERMIT
 NSR 16909 & PSDTX780 SC 4 PERMIT
 NSR 83816 SC 11A(ii) (MSS) PERMIT
 Description: Failure to comply with permitted emissions rates for the Cogen Unit 2, EPN CG2. EIC B18(g)(1) Mod 2D
 Self Report? NO Classification: Moderate
 Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
 30 TAC Chapter 122, SubChapter B 122.143(4)
 5C THSC Chapter 382 382.085(b)
 FOP O2288 GTC OP
 FOP O2288 SC 19 OP
 NSR 49247 SC 3 PERMIT
 Description: Failure to maintain the minimum concentration in the aeration basins as required. EIC B18(g)(1) Mod 2D
 Self Report? NO Classification: Moderate
 Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
 30 TAC Chapter 122, SubChapter B 122.143(4)
 5C THSC Chapter 382 382.085(b)
 FOP O2288 GTC OP
 FOP O2288 SC 19 OP
 FOP O2288 SC 1A OP
 NSR 19823 SC 5C PERMIT
 Description: Failure to maintain required records for ethylene cracking furnace decoking

operations. EIC B3 Mod 2B

Self Report? NO Classification: Moderate

Citation:

30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)
40 CFR Chapter 1, Subchapter C, PT 63, Subpt YY 63.1103(e)(4)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT CC 63.670(o)(4)
5C THSC Chapter 382 382.085(b)
FOP O2288 GTC OP
FOP O2288 SC 19 OP
FOP O2288 SC 1A OP
NSR 19823 SC 5C PERMIT

Description: Failure to complete a root cause and corrective action analysis within 45 days of applicable flare flow event. EIC B3 Mod 2B

Self Report? NO Classification: Moderate

Citation:

30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)
40 CFR Chapter 1, Subchapter C, PT 63, Subpt YY 63.1103(e)(4)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT CC 63.670(b)
5C THSC Chapter 382 382.085(b)
FOP O2288 GTC OP
FOP O2288 SC 19 OP
FOP O2288 SC 1A OP
NSR 19823 SC 10B PERMIT
NSR 19823 SC 5C PERMIT

Description: Failure to maintain a flare operating with pilot flame as required. EIC B18(g)(1) Mod 2D

Self Report? NO Classification: Moderate

Citation:

30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)
40 CFR Chapter 1, Subchapter C, PT 63, Subpt YY 63.1103(e)(4)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT CC 63.670(d)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT CC 63.670(e)
5C THSC Chapter 382 382.085(b)
FOP O2288 GTC OP
FOP O2288 SC 19 OP
FOP O2288 SC 1A OP
NSR 19823 SC 5C PERMIT

Description: Failure to continuously calculate the flare tip velocity and net heating value of the combustion zone on a 15-minute block period basis for the three A3 Unit South, North, and Center Flares, EPNs UER037, UERo44, and UER046, respectively. EIC B3 Mod 2B

Self Report? NO Classification: Moderate

Citation:

30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)
40 CFR Chapter 1, Subchapter C, PT 63, Subpt YY 63.1103(e)(4)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT CC 63.670(h)(2)
5C THSC Chapter 382 382.085(b)
FOP O2288 GTC OP
FOP O2288 SC 19 OP
FOP O2288 SC 1A OP
NSR 19823 SC 5C PERMIT

Description: Failure to maintain continuously recorded images for visual emissions observations of the flare flame for the three A3 Unit South, North, and Center Flares, EPNs UER037, UERo44, and UER046, respectively. EIC B3 Mod 2B

Self Report? NO Classification: Moderate

Citation:

30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)
40 CFR Chapter 1, Subchapter C, PT 63, Subpt YY 63.1103(e)(4)
5C THSC Chapter 382 382.085(b)
FOP O2288 GTC OP
FOP O2288 SC 19 OP
FOP O2288 SC 1A OP
NSR 19823 SC 5C PERMIT

Description: Failure to maintain a minimum net heating value in the combustion zone of

270 Btu/scf of the gas being combusted in the steam assisted A3 Unit South, North, and Center Flares, EPNs UER037, UERo44, and UER046, respectively. EIC B18(g)(1) Mod 2D

Self Report? NO Classification: Moderate

Citation:

30 TAC Chapter 116, SubChapter B 116.115(c)
40 CFR Chapter 61, SubChapter C, PT 61, SubPT FF 61.343(a)
40 CFR Chapter 61, SubChapter C, PT 61, SubPT FF 61.346(b)(3)
40 CFR Chapter 61, SubChapter C, PT 61, SubPT FF 61.349(f)
5C THSC Chapter 382 382.085(b)
FOP O2288 GTC OP
FOP O2288 SC 19 OP
FOP O2288 SC 1A OP
NSR 19823 SC 4C PERMIT

Description: Failure to conduct inspections and monitoring for all equipment in benzene waste operations, as required. EIC B1 Mod 2A

Self Report? NO Classification: Moderate

Citation:

30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)
40 CFR Chapter 61, SubChapter C, PT 61, SubPT FF 61.343(a)
40 CFR Chapter 61, SubChapter C, PT 61, SubPT FF 61.349(a)
40 CFR Chapter 61, SubChapter C, PT 61, SubPT FF 61.351(a)
5C THSC Chapter 382 382.085(b)
FOP O2288 GTC OP
FOP O2288 SC 19 OP
FOP O2288 SC 1A OP
NSR 19823 SC 4C PERMIT

Description: Failure to identify all equipment in BWON service. EIC B1 Mod 2A

Self Report? NO Classification: Moderate

Citation:

30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)
40 CFR Chapter 61, SubChapter C, PT 61, SubPT FF 61.356(d)
5C THSC Chapter 382 382.085(b)
FOP O2288 GTC OP
FOP O2288 SC 19 OP
FOP O2288 SC 1A OP
NSR 19823 SC 4C PERMIT

Description: Failure to maintain design documentation and certification for BWON control equipment. EIC B3 Mod 2B

Self Report? NO Classification: Moderate

Citation:

30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)
40 CFR Chapter 61, SubChapter C, PT 61, SubPT FF 61.356(f)
5C THSC Chapter 382 382.085(b)
FOP O2288 GTC OP
FOP O2288 SC 19 OP
FOP O2288 SC 1A OP
NSR 19823 SC 4C PERMIT

Description: Failure to maintain design documentation and certification for BWON control devices. EIC B3 Mod 2B

Self Report? NO Classification: Moderate

Citation:

30 TAC Chapter 116, SubChapter B 116.115(c)
40 CFR Chapter 61, SubChapter C, PT 61, SubPT FF 61.355(a)
40 CFR Chapter 61, SubChapter C, PT 61, SubPT FF 61.356(b)
5C THSC Chapter 382 382.085(b)
FOP O2288 GTC OP
FOP O2288 SC 19 OP
FOP O2288 SC 1A OP
NSR 19823 SC 4C PERMIT

Description: Failure to identify all BWON waste streams in the Total Annual Benzene (TAB) and uncontrolled Benzene Quantity (BQ) reports. EIC B3 Mod 2B

Self Report? NO Classification: Moderate

Citation:

30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)
40 CFR Chapter 61, SubChapter C, PT 61, SubPT FF 61.356(b)

5C THSC Chapter 382 382.085(b)
 FOP O2288 GTC OP
 FOP O2288 SC 19 OP
 FOP O2288 SC 1A OP
 NSR 19823 SC 4C PERMIT
 Description: Failure to account for all BWON waste streams at the Point of Generation (POG). EIC B3 Mod 2B

Self Report? NO Classification: Moderate
 Citation:

30 TAC Chapter 116, SubChapter B 116.115(c)
 30 TAC Chapter 122, SubChapter B 122.143(4)
 40 CFR Chapter 61, SubChapter C, PT 61, SubPT FF 61.355(a)
 40 CFR Chapter 61, SubChapter C, PT 61, SubPT FF 61.356(b)
 5C THSC Chapter 382 382.085(b)
 FOP O2288 GTC OP
 FOP O2288 SC 19 OP
 FOP O2288 SC 1A OP
 NSR 19823 SC 4C PERMIT

Description: Failure to update data used to calculate the TAB and uncontrolled BQ to be representative of current operations and configuration of the facility. EIC B3 Mod 2B

Self Report? NO Classification: Moderate
 Citation:

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

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

Self Report? NO Classification: Moderate
 Citation:

30 TAC Chapter 122, SubChapter B 122.143(4)
 30 TAC Chapter 122, SubChapter B 122.146(1)
 30 TAC Chapter 122, SubChapter B 122.146(5)(D)
 FOP O2288 GTC OP

Description: Failure to accurately certify compliance with the terms and conditions of permit FOP O2288. EIC B3 MOD 2B

* NOVs applicable for the Compliance History rating period 9/1/2020 to 8/31/2025

Appendix B

All Investigations Conducted During Component Period November 07, 2020 and November 07, 2025

Item 1	November 12, 2020**	(1712404)
Item 2	November 20, 2020**	(1691052)
Item 3	December 08, 2020**	(1686785)
Item 4	December 17, 2020**	(1691536)
Item 5	December 21, 2020**	(1712405)
Item 6	January 12, 2021**	(1685323)
Item 7*	January 15, 2021**	(1690222)
Item 8	February 09, 2021**	(1712406)
Item 9	February 22, 2021**	(1725459)
Item 10	February 26, 2021**	(1703206)
Item 11	March 22, 2021**	(1725460)
Item 12	April 25, 2021**	(1725461)
Item 13	May 05, 2021**	(1705409)
Item 14	May 21, 2021**	(1740040)
Item 15*	May 30, 2021**	(1705313)
Item 16*	June 03, 2021**	(1705331)
Item 17*	June 04, 2021**	(1706401)

Item 18*	June 08, 2021**	(1706652)
Item 19*	June 09, 2021**	(1706708)
Item 20	June 24, 2021**	(1747566)
Item 21	June 25, 2021**	(1504274)
Item 22	June 30, 2021**	(1708810)
Item 23	July 06, 2021**	(1723958)
Item 24	July 22, 2021**	(1751687)
Item 25	July 29, 2021**	(1746290)
Item 26	August 13, 2021**	(1725189)
Item 27	August 23, 2021**	(1757151)
Item 28	August 24, 2021**	(1756145)
Item 29	September 17, 2021**	(1701895)
Item 30	September 20, 2021**	(1738982)
Item 31	September 23, 2021**	(1766231)
Item 32	September 30, 2021**	(1745141)
Item 33	October 22, 2021**	(1776634)
Item 34*	November 08, 2021**	(1765078)
Item 35	November 09, 2021**	(1762475)
Item 36*	November 16, 2021**	(1762383)
Item 37*	November 22, 2021**	(1783603)
Item 38*	December 07, 2021**	(1764498)
Item 39*	December 24, 2021**	(1790627)
Item 40*	January 20, 2022**	(1798422)
Item 41	January 27, 2022**	(1772316)
Item 42	February 16, 2022**	(1806297)
Item 43*	February 17, 2022**	(1782346)
Item 44	February 22, 2022**	(1774849)
Item 45*	March 14, 2022**	(1782372)
Item 46	March 23, 2022**	(1813362)
Item 47	April 01, 2022**	(1796299)
Item 48	April 25, 2022**	(1819934)
Item 49	May 12, 2022**	(1828774)
Item 50*	May 20, 2022**	(1817383)
Item 51	June 21, 2022**	(1810113)
Item 52	June 29, 2022**	(1810121)
Item 53	July 22, 2022**	(1842270)
Item 54	August 03, 2022**	(1832699)
Item 55	August 04, 2022**	(1832555)
Item 56	August 08, 2022**	(1833534)
Item 57	August 23, 2022**	(1848404)
Item 58	August 30, 2022**	(1833615)
Item 59	September 19, 2022**	(1856200)
Item 60	October 19, 2022**	(1862558)
Item 61*	October 20, 2022**	(1804094)
Item 62	October 28, 2022**	(1847484)
Item 63*	November 04, 2022**	(1853646)
Item 64*	November 18, 2022**	(1859919)
Item 65*	November 24, 2022**	(1869473)

Item 66*	December 16, 2022**	(1866706)
Item 67*	December 19, 2022**	(1875320)
Item 68*	December 20, 2022**	(1866347)
Item 69*	January 02, 2023**	(1867211)
Item 70*	January 25, 2023**	(1873565)
Item 71	January 27, 2023**	(1870958)
Item 72	January 30, 2023**	(1846144)
Item 73*	February 09, 2023**	(1103459)
Item 74	February 20, 2023**	(1889959)
Item 75*	February 28, 2023**	(1880777)
Item 76	March 23, 2023**	(1898516)
Item 77	March 31, 2023**	(1846095)
Item 78	April 25, 2023**	(1905305)
Item 79	May 24, 2023**	(1912490)
Item 80*	June 23, 2023**	(1919090)
Item 81	July 24, 2023**	(1926055)
Item 82*	July 31, 2023**	(1916632)
Item 83	August 14, 2023**	(1918521)
Item 84	August 16, 2023**	(1918831)
Item 85	August 21, 2023**	(1918834)
Item 86	August 23, 2023**	(1933020)
Item 87	September 21, 2023**	(1939154)
Item 88	October 23, 2023**	(1946006)
Item 89	November 20, 2023**	(1925974)
Item 90	November 21, 2023**	(1951698)
Item 91	December 14, 2023**	(1961460)
Item 92*	December 28, 2023**	(1945434)
Item 93*	January 03, 2024**	(1943503)
Item 94	January 23, 2024**	(1968056)
Item 95	February 05, 2024**	(1955333)
Item 96	February 12, 2024**	(1955396)
Item 97*	February 23, 2024**	(1965948)
Item 98	February 25, 2024**	(1977119)
Item 99	March 19, 2024**	(1983684)
Item 100	April 01, 2024**	(1955175)
Item 101	April 10, 2024**	(1990214)
Item 102*	May 09, 2024**	(1908965)
Item 103*	May 21, 2024**	(1996671)
Item 104	June 18, 2024**	(2003621)
Item 105	July 02, 2024**	(1995475)
Item 106	July 03, 2024**	(1988158)
Item 107	July 16, 2024**	(2011175)
Item 108	August 06, 2024**	(2001549)
Item 109	August 15, 2024**	(2016779)
Item 110*	August 20, 2024**	(1993903)
Item 111	August 21, 2024**	(2007927)
Item 112*	August 22, 2024**	(2002625)
Item 113	September 17, 2024**	(2023796)

Item 114	September 20, 2024**	(2007930)
Item 115	September 24, 2024**	(1917475)
Item 116	September 30, 2024**	(2015214)
Item 117	October 15, 2024**	(2029920)
Item 118	October 21, 2024**	(2015870)
Item 119*	October 23, 2024**	(2021464)
Item 120*	October 25, 2024**	(1995672)
Item 121	November 20, 2024**	(2036241)
Item 122*	November 21, 2024**	(2020803)
Item 123*	December 11, 2024**	(2042352)
Item 124*	December 27, 2024**	(2034419)
Item 125	January 02, 2025**	(2033612)
Item 126	January 09, 2025**	(1931471)
Item 127*	January 16, 2025**	(2049179)
Item 128	January 27, 2025**	(2034447)
Item 129*	February 18, 2025**	(2056747)
Item 130	March 19, 2025**	(2065313)
Item 131*	April 03, 2025**	(1949827)
Item 132*	April 08, 2025**	(2055125)
Item 133*	April 15, 2025**	(2072118)
Item 134*	May 09, 2025**	(2047341)
Item 135	May 20, 2025**	(2078517)
Item 136	June 11, 2025**	(2085608)
Item 137	June 16, 2025**	(2071403)
Item 138*	June 24, 2025**	(1989172)
Item 139	July 03, 2025**	(2001226)
Item 140	July 10, 2025**	(2092717)
Item 141	July 16, 2025**	(2072012)
Item 142	August 08, 2025**	(2084627)
Item 143	August 19, 2025**	(2099297)
Item 144	August 28, 2025**	(2083016)
Item 145	September 09, 2025	(2090840)
Item 146	October 10, 2025	(2097060)
Item 147*	October 20, 2025	(2102910)
Item 148*	October 28, 2025	(2090031)

* No violations documented during this investigation

**Investigation applicable for the Compliance History Rating period between 09/01/2020 and 08/31/2025.

TEXAS COMMISSION ON ENVIRONMENTAL QUALITY



IN THE MATTER OF AN
ENFORCEMENT ACTION
CONCERNING
INDORAMA VENTURES OXIDES LLC
RN100219252

§ BEFORE THE
§ TEXAS COMMISSION ON
§ ENVIRONMENTAL QUALITY
§

AGREED ORDER DOCKET NO. 2025-1087-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 Indorama Ventures Oxides 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 petrochemical manufacturing plant located at 2701 Spur 136 in Port Neches, 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 \$18,625 is assessed by the Commission in settlement of the violations alleged in Section II ("Allegations"). The Respondent paid \$8,450 of the penalty and \$3,725 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.

Pursuant to TEX. WATER CODE § 7.067, \$6,450 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 from June 20, 2025 through July 1, 2025, an investigator documented that the Respondent failed to prevent unauthorized emissions, in violation of 30 TEX. ADMIN. CODE §§ 116.115(c) and 122.143(4), New Source Review ("NSR") Permit No. 5952A, Special Conditions ("SC") No. 1, NSR Permit No. 106169, SC No. 1, NSR Permit No. 19823, SC No. 1, Federal Operating Permit ("FOP") No. O2288, General Terms and Conditions ("GTC") and Special Terms and Conditions ("STC") No. 19, FOP No. O1320, GTC and SCT No. 16, and TEX. HEALTH & SAFETY CODE § 382.085(b). Specifically, the Respondent released 8,076.67 pounds ("lbs") of volatile organic compounds ("VOC") as fugitive emissions and 1,475.73 lbs of carbon monoxide, 270.74 lbs of nitrogen oxides, and 1,659.25 lbs of VOC from the Flare No. 3, Emissions Point Number UER037, during an emissions event (Incident No. 424887) that began on June 12, 2024 and lasted 14 hours and 30 minutes..

III. DENIALS

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

IV. ORDERING PROVISIONS

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

1. The Respondent is assessed a penalty as set forth in Section I, Paragraph No. 4. The payment of this penalty and the Respondent's compliance with all of the requirements set forth in this Order resolve only the allegations in Section II. The Commission shall not be constrained in any manner from requiring corrective action or penalties for violations which are not raised here. Penalty payments shall be made payable to "TCEQ" and shall be sent with the notation "Re: Indorama Ventures Oxides LLC, Docket No. 2025-1087-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 \$6,450 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 that demonstrates actions taken to prevent the recurrence of emissions events due to the same or similar causes as Incident No. 424887.
 - 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. 3.a. The certification shall be signed by the Respondent and shall include the following certification language:

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

The certification shall be submitted to:

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

Date

Krista Mello-Jurack

03/23/2026

For the Executive Director

Date

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

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

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

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

James Lilla

Signature

3/11/2026

Date

JACK TINDEL

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

SITE DIRECTOR

Title

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

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

Attachment A

Docket Number: 2025-1087-AIR-E

SUPPLEMENTAL ENVIRONMENTAL PROJECT

Respondent:	Indorama Ventures Oxides LLC
Payable Penalty Amount:	\$14,900
SEP Offset Amount:	\$6,450
Type of SEP:	Contribution to a Third-Party Pre-Approved SEP
Third-Party Administrator:	Texas Association of Resource Conservation & Development Areas, Inc.
Project Name:	<i>Cleanup of Unauthorized Dump/Tire Sites</i>
Total Project Budget:	\$1,140,000
Location of SEP:	Anderson, Angelina, Aransas, Austin, Bastrop, Bee, Bell, Bosque, Bowie, Brazoria, Brazos, Brooks, Brown, Burlison, Caldwell, Calhoun, Callahan, Cameron, Camp, Cass, Chambers, Cherokee, Colorado, Comanche, Coryell, Dallas, Delta, DeWitt, Duval, Eastland, Ellis, Erath, Falls, Fannin, Fayette, Fort Bend, Franklin, Freestone, Galveston, Goliad, Gonzales, Gregg, Grimes, Hamilton, Hardin, Harris, Harrison, Hays, Henderson, Hidalgo, Hill, Hood, Hopkins, Houston, Hunt, Jackson, Jasper, Jefferson, Jim Hogg, Jim Wells, Johnson, Karnes, Kaufman, Kenedy, Kleberg, Lamar, Lavaca, Lee, Leon, Liberty, Limestone, Live Oak, Madison, Marion, Matagorda, McLennan, McMullen, Milam, Mills, Montgomery, Morris, Nacogdoches, Navarro, Newton, Nueces, Orange, Palo Pinto, Panola, Parker, Polk, Rains, Red River, Refugio, Robertson, Rockwall, Rusk, Sabine, San Augustine, San Jacinto, San Patricio, Shackelford, Shelby, Smith, Somervell, Starr, Stephens, Tarrant, Titus, Travis, Trinity, Tyler, Upshur, Van Zandt, Victoria, Walker, Waller, Washington, Webb, Wharton, Willacy, Williamson, Wood, and Zapata Counties.

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

1. Project Description

A. Project

The Respondent shall contribute the SEP Offset Amount to the **Texas Association of Resource Conservation & Development Areas, Inc.**, as a Third-Party Administrator, for its Cleanup of Unauthorized Dump/Tire Sites project (the “Project”). The Project will involve cleanup of sites where trash, tires, or other materials have been illegally disposed of. The Third-Party Administrator shall use the SEP Offset Amount to perform the Project. The Project will be done in accordance with all federal, state, and local environmental laws and regulations. The contribution will be used in accordance with the SEP Agreement between the Third-Party Administrator and TCEQ.

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

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

B. Environmental Benefit

This SEP will provide a discernable environmental benefit by reducing the dangers and health threats associated with illegally dumped tires. Areas used for illegal tire dumping may be easily accessible to people, especially children, exposing them to physical hazards. Abandoned tires and tire scraps collect standing water, which attract rodents and insects and provide ideal breeding grounds for mosquitoes carrying diseases such as the West Nile Virus. Tires are highly flammable, and tire fires are difficult to extinguish, leading to contamination of air, land, and water. Run-off from scrap tires can contaminate groundwater and surface water. In addition, abandoned tires may impact drainage, making areas more susceptible to flooding when the waste blocks waterways.

This SEP will also help reduce the dangers and health threats associated with non-regulated trash dumps, which contaminate air and water and harbor disease-carrying animals and insects. The SEP will remove solid waste that might otherwise be disposed of in storm drains, the sewage system, or via other means detrimental to the environment.

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 contribution payable to the **Texas Association of Resource Conservation & Development Areas, Inc.**, and mail it with a copy of the Agreed Order to:

Texas Association of Resource Conservation & Development Areas, Inc.
Attention: Executive Director
P.O. Box 2533
Victoria, Texas 77902

3. Records and Reporting

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

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

4. Failure to Fully Perform

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

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

5. Publicity

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

6. Recognition

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

7. Other SEPs by TCEQ or Other Agencies

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