Executive Summary – Enforcement Matter – Case No. 68720
INEOS Americas LLC
RN100213958
Docket No. 2025-1652-AIR-E

Order Type:
1660 Agreed Order
Findings Order Justification:
N/A
Media:
AIR
Small Business:
No
Location(s) Where Violation(s) Occurred:
INEOS Americas Pasadena Site, 3503 Pasadena Freeway, Pasadena, Harris County
Type of Operation:
Chemical manufacturing plant
Other Significant Matters:
Additional Pending Enforcement Actions: Yes, Docket Nos. 2025-1899-AIR-E, 2025-1166-AIR-E, and 2024-0385-AIR-E
Past-Due Penalties: No
Past-Due Fees: No
Other: N/A
Interested Third-Parties: None
Texas Register Publication Date: April 17, 2026
Comments Received: No

Penalty Information

Total Penalty Assessed: $17,750
Amount Deferred for Expedited Settlement: $3,550
Total Paid to General Revenue: $14,200
Total Due to General Revenue: $0
Payment Plan: N/A
Compliance History Classifications:
Person/CN - Satisfactory
Site/RN - Satisfactory
Major Source: Yes
Statutory Limit Adjustment: N/A
Applicable Penalty Policy: January 2021

Investigation Information

Complaint Date(s): N/A
Complaint Information: N/A
Date(s) of Investigation: October 2, 2025
Date(s) of NOE(s): October 15, 2025

Executive Summary – Enforcement Matter – Case No. 68720
INEOS Americas LLC
RN100213958
Docket No. 2025-1652-AIR-E

Violation Information

Failed to prevent unauthorized emissions. Specifically, the Respondent released 7,634.00 pounds of benzene as fugitive emissions during an emissions event (Incident No. 425347) that occurred on June 21, 2024 and lasted one hour and four minutes [30 TEX. ADMIN. CODE §§ 116.115(c) and 122.143(4), New Source Review Permit No. 4825A, Special Conditions No. 1, Federal Operating Permit No. O1621, General Terms and Conditions and Special Terms and Conditions No. 18, and TEX. HEALTH & SAFETY CODE § 382.085(b)].

Corrective Actions/Technical Requirements

Corrective Action(s) Completed:

By September 1, 2025, the Respondent ensured that all changes that remove a layer of protection are subject to Management of Change that includes what additional layers of protection are then needed, inspected all Spec 34 tubing in the plant and corrected any with unions in straight tubing runs, and installed new area Lower Explosive Limit monitors for earlier detections of spills and releases in order to prevent the recurrence of emissions events due to the same or similar causes as Incident No. 425347.

Technical Requirements:

N/A

Contact Information

TCEQ Attorney: N/A
TCEQ Enforcement Coordinator: John Burkett, Enforcement Division, Enforcement Team 2, MC R-12, (512) 239-4169; Michael Parrish, Enforcement Division, MC R-12, (512) 239-2548
Respondent: Mike Meyer, Site Manager, INEOS Americas LLC, 3503 Pasadena Freeway, Pasadena, Texas 77503
Respondent's Attorney: N/A

Penalty Calculation Worksheet (PCW)

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

DATES						
Assigned	22-Oct-2025					
PCW	27-Feb-2026	**Screening**	22-Oct-2025	**EPA Due**		

RESPONDENT/FACILITY INFORMATION

Respondent	INEOS Americas LLC		
Reg. Ent. Ref. No.	RN100213958		
Facility/Site Region	12-Houston	**Major/Minor Source**	Major

CASE INFORMATION

Enf./Case ID No.	68720	**No. of Violations**	1
Docket No.	2025-1652-AIR-E	**Order Type**	1660
Media Program(s)	Air	**Government/Non-Profit**	No
Multi-Media		**Enf. Coordinator**	John Burkett
		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**

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

Compliance History **67.0%** Adjustment — ***Subtotals 2, 3, & 7*** **$8,375**

Notes: Enhancement for one NOV with same/similar violations, two orders containing a denial of liability, and one order without a denial of liability. Reduction for one notice of intent to conduct an audit and one disclosure of violations.

Culpability No **0.0%** Enhancement — ***Subtotal 4*** **$0**

Notes: The Respondent does not meet the culpability criteria.

Good Faith Effort to Comply Total Adjustments — ***Subtotal 5*** **-$3,125**

Economic Benefit **0.0%** Enhancement* — ***Subtotal 6*** **$0**

Total EB Amounts $599
Estimated Cost of Compliance $10,000
**Capped at the Total EB $ Amount*

SUM OF SUBTOTALS 1-7 — ***Final Subtotal*** **$17,750**

OTHER FACTORS AS JUSTICE MAY REQUIRE **0.0%** **$0**

Reduces or enhances the Final Subtotal by the indicated percentage.

Notes:

Final Penalty Amount **$17,750**

STATUTORY LIMIT ADJUSTMENT — ***Final Assessed Penalty*** **$17,750**

DEFERRAL **20.0%** Reduction — ***Adjustment*** **-$3,550**

Reduces the Final Assessed Penalty by the indicated percentage.

Notes: Deferral offered for expedited settlement.

PAYABLE PENALTY **$14,200**

Screening Date 22-Oct-2025 **Docket No.** 2025-1652-AIR-E **PCW**

Respondent INEOS Americas LLC

Case ID No. 68720

Reg. Ent. Reference No. RN100213958

Media Air

Enf. Coordinator John Burkett

Policy Revision 5 (January 28, 2021)

PCW Revision February 11, 2021

Compliance History Worksheet

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

Component	Number of...	Number	Adjust.
NOVs	Written notices of violation ("NOVs") with same or similar violations as those in the current enforcement action (*number of NOVs meeting criteria*)	1	5%
	Other written NOVs	0	0%
Orders	Any agreed final enforcement orders containing a denial of liability (*number of orders meeting criteria*)	2	40%
	Any adjudicated final enforcement orders, agreed final enforcement orders without a denial of liability, or default orders of this state or the federal government, or any final prohibitory emergency orders issued by the commission	1	25%
Judgments and Consent Decrees	Any non-adjudicated final court judgments or consent decrees containing a denial of liability of this state or the federal government (*number of judgments or consent decrees meeting criteria*)	0	0%
	Any adjudicated final court judgments and default judgments, or non-adjudicated final court judgments or consent decrees without a denial of liability, of this state or the federal government	0	0%
Convictions	Any criminal convictions of this state or the federal government (*number of counts*)	0	0%
Emissions	Chronic excessive emissions events (*number of events*)	0	0%
Audits	Letters notifying the executive director of an intended audit conducted under the Texas Environmental, Health, and Safety Audit Privilege Act, 74th Legislature, 1995 *(number of audits for which notices were submitted)*	1	-1%
	Disclosures of violations under the Texas Environmental, Health, and Safety Audit Privilege Act, 74th Legislature, 1995 (*number of audits for which violations were disclosed*)	1	-2%

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) 67%

>> Repeat Violator (Subtotal 3)

No

Adjustment Percentage (Subtotal 3) 0%

>> Compliance History Person Classification (Subtotal 7)

Satisfactory Performer

Adjustment Percentage (Subtotal 7) 0%

>> Compliance History Summary

Compliance History Notes

Enhancement for one NOV with same/similar violations, two orders containing a denial of liability, and one order without a denial of liability. Reduction for one notice of intent to conduct an audit and one disclosure of violations.

Total Compliance History Adjustment Percentage (Subtotals 2, 3, & 7) 67%

>> Final Compliance History Adjustment

Final Adjustment Percentage ****capped at 100%*** 67%

Screening Date 22-Oct-2025 **Docket No.** 2025-1652-AIR-E **PCW**

Policy Revision 5 (January 28, 2021)

PCW Revision February 11, 2021

Respondent INEOS Americas LLC

Case ID No. 68720

Reg. Ent. Reference No. RN100213958

Media Air

Enf. Coordinator John Burkett

Violation Number 1

Rule Cite(s) 30 Tex. Admin. Code §§ 116.115(c) and 122.143(4), New Source Review Permit No. 4825A, Special Conditions No. 1, Federal Operating Permit ("FOP") No. O1621, General Terms and Conditions ("GTC") and Special Terms and Conditions ("STC") No. 18, and Tex. Health & Safety Code § 382.085(b)

Violation Description Failed to prevent unauthorized emissions. Specifically, the Respondent released 7,634.00 pounds of benzene as fugitive emissions during an emissions event (Incident No. 425347) that occurred on June 21, 2024 and lasted one hour and four minutes.

Base Penalty $25,000

>> Environmental, Property and Human Health Matrix

OR

Release	Harm: Major	Moderate	Minor
Actual		x	
Potential			

Percent 50.0%

>>Programmatic Matrix

Falsification	Major	Moderate	Minor

Percent 0.0%

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

Adjustment $12,500

$12,500

Violation Events

Number of Violation Events: 1 — 1 Number of violation days

daily	
weekly	x
monthly	
quarterly	
semiannual	
annual	
single event	

Violation Base Penalty $12,500

One weekly event is recommended.

Good Faith Efforts to Comply

25.0% Reduction $3,125

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

Notes: The Respondent completed corrective measures by September 1, 2025, prior to the Notice of Enforcement dated October 15, 2025.

Violation Subtotal $9,375

Economic Benefit (EB) for this violation

Estimated EB Amount $599

Statutory Limit Test

Violation Final Penalt Total $17,750

This violation Final Assessed Penalt ad usted for limits $17,750

Economic Benefit Worksheet

Respondent INEOS Americas LLC
Case ID No. 68720
Reg. Ent. Reference No. RN100213958
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	21-Jun-2024	1-Sep-2025	1.20	$599	n/a	$599
Notes for DELAYED costs	Estimated cost to ensure that all changes that remove a layer of protection are subject to Management of Change that includes what additional layers of protection are then needed, inspect all Spec 34 tubing in the plant and correct any with unions in straight tubing runs, and install new area Lower Explosive Limit monitors for earlier detections of spills and releases in order to prevent the recurrence of emissions events due to the same or similar causes as Incident No. 425347. The Date Required is the date the emissions event occurred and the Final Date is the date of compliance.						
Avoided Costs	**ANNUALIZE avoided costs before entering item (except for one-time avoided costs)**						
Disposal				0.00	$0	$0	$0
Personnel				0.00	$0	$0	$0
Inspection/Reporting/Sampling				0.00	$0	$0	$0
Supplies/Equipment				0.00	$0	$0	$0
Financial Assurance				0.00	$0	$0	$0
ONE-TIME avoided costs				0.00	$0	$0	$0
Other (as needed)				0.00	$0	$0	$0
Notes for AVOIDED costs							

Approx. Cost of Compliance $10,000

TOTAL $599

The TCEQ is committed to accessibility.
To request a more accessible version of this report, please contact the TCEQ Help Desk at (512) 239-4357.

Compliance History Report

Compliance History Report for CN602805236, RN100213958, Rating Year 2025 which includes Compliance History (CH) components from September 1, 2020, through August 31, 2025.

Customer, Respondent, or Owner/Operator: CN602805236, INEOS Americas LLC **Classification:** SATISFACTORY **Rating:** 35.00

Regulated Entity: RN100213958, INEOS AMERICAS PASADENA SITE **Classification:** SATISFACTORY **Rating:** 6.08

Complexity Points: 30 **Repeat Violator:** NO

CH Group: 05 - Chemical Manufacturing

Location: 3503 PASADENA FWY, PASADENA, HARRIS COUNTY, TX

TCEQ Region: REGION 12 - HOUSTON

ID Number(s):

AIR OPERATING PERMITS ACCOUNT NUMBER HG0276T
AIR OPERATING PERMITS PERMIT 1621
AIR NEW SOURCE PERMITS PERMIT 4825A
AIR NEW SOURCE PERMITS REGISTRATION 23352
AIR NEW SOURCE PERMITS ACCOUNT NUMBER HG0276T
AIR NEW SOURCE PERMITS AFS NUM 4820100186
AIR NEW SOURCE PERMITS REGISTRATION 133385
AIR NEW SOURCE PERMITS REGISTRATION 111782
AIR NEW SOURCE PERMITS REGISTRATION 111781
AIR NEW SOURCE PERMITS REGISTRATION 170236
AIR NEW SOURCE PERMITS REGISTRATION 158358
AIR NEW SOURCE PERMITS REGISTRATION 159453
PETROLEUM STORAGE TANK REGISTRATION REGISTRATION 86858
IHW CORRECTIVE ACTION SOLID WASTE REGISTRATION # (SWR) 31608
STORMWATER PERMIT TXR05CO53
WASTEWATER PERMIT WQ0002067000
WASTEWATER EPA ID TX0072320
AIR EMISSIONS INVENTORY ACCOUNT NUMBER HG0276T
POLLUTION PREVENTION PLANNING ID NUMBER P00268
INDUSTRIAL AND HAZARDOUS WASTE EPA ID TXD093565653

Compliance History Period: September 01, 2020 to August 31, 2025 **Rating Year:** 2025 **Rating Date:** 09/01/2025

Date Compliance History Report Prepared: February 27, 2026

Agency Decision Requiring Compliance History: Enforcement

Component Period Selected: February 27, 2021 to February 27, 2026

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

Name: John Burkett **Phone:** (512) 239-1000

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: 07/27/2023 ADMINORDER 2021-1233-AIR-E (Findings Order-Agreed Order Without Denial)

Classification: Major

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 1621, GTC OP
FOP 1621, STC No. 19 OP
Special Condition 1 PERMIT

Description: Failed to prevent unauthorized emissions. Specifically, the Respondent released 32,336.00 pounds of volatile organic compounds from Cumene Tank T-4, Emissions Point Number ("EPN") 5, and released 82,533.00 lbs

of VOC from Cumene Tank T-5, EPN 6, during an emissions event (Incident No. 287676) that began on July 4, 2018 and lasted 68 hours. The emissions event occurred due to corrosion in the seal area for the check mate valves for both tanks that caused blockages and did not properly allow rain

2 Effective Date: 10/16/2024 ADMINORDER 2022-1655-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: Special Condition 8 PERMIT
Special Term and Condition 18 OP

Description: Failed to comply with the concentration limits. Specifically, the Respondent exceeded the CO concentration limit of 100 ppmvd based at 7.0% stack gas O2 on a rolling hour average ... and exceeded the NOx concentration limit of 13.0 ppmvd based at 7.0% O2 on a rolling hourly average ... for a total of 201 hours on 17 days from September 15, 2021 to March 27, 2022 for the Hot Oil Heater, Emissions Point Number ("EPN") 12.

Classification: Moderate

Citation: 30 TAC Chapter 116, SubChapter B 116.115(b)(2)(F)
30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)
5C THSC Chapter 382 382.085(b)

Rqmt Prov: Special Condition 1 PERMIT
Special Term and Condition 18 OP

Description: Failed to comply with the MAER, in violation of 30 TEX. ADMIN. CODE §§ 116.115(b)(2)(F) and (c) and 122.143(4), NSR Permit No. 4825A, SC No. 1, FOP No. O1621, GTC and STC No. 18, and TEX. HEALTH & SAFETY CODE § 382.085(b). Specifically, the Respondent exceeded the VOC MAER of 3.78 lbs/hr by a range of 0.002 lb/hr to 135.24 lbs/hr for a total of 835 hours on 123 days from May 24, 2021 to May 23, 2022 for the Flare, EPN 11, resulting in 11,903.02 lbs of unauthorized VOC emissions.

See addendum for information regarding federal actions.

B. Criminal convictions:

N/A

C. Chronic excessive emissions events:

N/A

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

Item 1	March 01, 2021	(1692258)
Item 2	March 19, 2021	(1728200)
Item 3	March 23, 2021	(1705464)
Item 4	April 20, 2021	(1728201)
Item 5	May 20, 2021	(1741394)
Item 6	June 17, 2021	(1748053)
Item 7	July 19, 2021	(1752593)
Item 8	August 20, 2021	(1758012)
Item 9	September 17, 2021	(1767257)
Item 10	October 19, 2021	(1777719)
Item 11	November 12, 2021	(1770888)
Item 12	November 22, 2021	(1784518)
Item 13	December 16, 2021	(1791548)
Item 14	January 20, 2022	(1799390)
Item 15	February 16, 2022	(1807208)
Item 16	March 18, 2022	(1814274)
Item 17	April 20, 2022	(1820846)
Item 18	May 19, 2022	(1829678)
Item 19	June 17, 2022	(1835977)
Item 20	July 19, 2022	(1843176)
Item 21	August 18, 2022	(1849344)
Item 22	September 19, 2022	(1857106)
Item 23	October 19, 2022	(1863462)
Item 24	November 18, 2022	(1870376)

Item 25	December 20, 2022	(1876227)
Item 26	January 19, 2023	(1883044)
Item 27	February 21, 2023	(1890853)
Item 28	March 20, 2023	(1899424)
Item 29	April 19, 2023	(1906227)
Item 30	May 19, 2023	(1913383)
Item 31	June 28, 2023	(1919991)
Item 32	July 26, 2023	(1926959)
Item 33	August 10, 2023	(1917245)
Item 34	August 21, 2023	(1923453)
Item 35	October 23, 2023	(1946901)
Item 36	October 30, 2023	(1924399)
Item 37	November 21, 2023	(1952590)
Item 38	December 19, 2023	(1962361)
Item 39	January 19, 2024	(1968951)
Item 40	February 19, 2024	(1978016)
Item 41	March 19, 2024	(1984590)
Item 42	April 17, 2024	(1991112)
Item 43	May 29, 2024	(1997567)
Item 44	June 19, 2024	(2004520)
Item 45	July 22, 2024	(2012075)
Item 46	August 27, 2024	(2017669)
Item 47	August 28, 2024	(2002786)
Item 48	September 19, 2024	(2024706)
Item 49	October 22, 2024	(2030814)
Item 50	November 05, 2024	(2022968)
Item 51	November 20, 2024	(2037136)
Item 52	December 16, 2024	(2043517)
Item 53	January 17, 2025	(2050081)
Item 54	February 19, 2025	(2057639)
Item 55	March 18, 2025	(2066201)
Item 56	April 15, 2025	(2073015)
Item 57	May 19, 2025	(2079403)
Item 58	June 18, 2025	(2086504)
Item 59	July 15, 2025	(2093607)
Item 60	August 25, 2025	(2100184)
Item 61	September 17, 2025	(2110251)
Item 62	October 16, 2025	(2110252)
Item 63	November 18, 2025	(2118812)
Item 64	December 16, 2025	(2125679)

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: 07/23/2025 (2029470)

Self Report? NO Classification: Moderate

Citation: 30 TAC Chapter 115, SubChapter D 115.352(4)
30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)
5C THSC Chapter 382 382.085(b)
Special Condition 24E PERMIT
Special Term & Condition 18 OP
Special Term & Condition 1A OP

Description: Failure to prevent an open-ended line (OEL). (Category C10)

Self Report? NO Classification: Moderate

Citation: 30 TAC Chapter 122, SubChapter B 122.143(4)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT G 63.120(b)(1)(iii)
5C THSC Chapter 382 382.085(b)
Special Term & Condition 1A OP

Description: Failure to perform annual seal gap measurements for Benzene Tank T-1 (EPN: 1). (Category B1)

Self Report? NO Classification: Moderate

Citation: 30 TAC Chapter 115, SubChapter B 115.114(a)(4)

30 TAC Chapter 122, SubChapter B 122.143(4)
5C THSC Chapter 382 382.085(b)
Special Term & Condition 1A OP

Description: Failure to perform secondary seal visual inspections for Benzene Tank T-1 (EPN: 1) at least once every six months. (Category B1)

Self Report? NO Classification: Moderate

Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)
5C THSC Chapter 382 382.085(b)
Special Condition 38.A.(4).(e) PERMIT
Special Term & Condition 18 OP

Description: Failure to limit degassing to the Flare (EPN: 11) to under 52 hours. (Category B18.g.1)

Self Report? NO Classification: Moderate

Citation: 30 TAC Chapter 122, SubChapter B 122.145(2)(A)
5C THSC Chapter 382 382.085(b)
General Terms & Conditions OP

Description: Failure to report all instances of deviations. (Category B3)

F. Environmental audits:

Notice of Intent Date: 03/18/2024 (1974624)

Disclosure Date: 11/06/2024

Viol. Classification: Moderate

Citation: 30 TAC Chapter 101, SubChapter F 101.201(a)
30 TAC Chapter 106, SubChapter U 106.475

Description: Failed to prevent 12 events of pressure vacuum safety valve (PSCS) activation and releases to the atmosphere from the Phenol Tank (T-27) resulting in emissions of Phenol vapors. The events were not previously known. The tank is normally vented to a scrubber for emissions control, is equipped with control systems to avoid overpressure and vacuum (12 events between 10/7/21 and 12/23/22).

Viol. Classification: Minor

Citation: 30 TAC Chapter 122, SubChapter B 122.145(2)

Description: Failed to include Finding No. 1 in deviation report for the compliance period 11/24/24-5/23/24.

G. Type of environmental management systems (EMSs):

N/A

H. Voluntary on-site compliance assessment dates:

N/A

I. Participation in a voluntary pollution reduction program:

N/A

J. Early compliance:

N/A

Sites Outside of Texas:

N/A

Addendum to Compliance History Federal Enforcement Actions

Reg Entity Name: INEOS AMERICAS PASADENA SITE

Reg Entity Add: 700 HARBOR BLVD

Reg Entity City: PASADENA ***Reg Entity No:*** **RN100213958**

EPA Case No: 06-2025-3380 ***Order Issue Date (yyyymmdd):*** 20250508

Case Result: Adminstrative Penalty Ord ***Statute:*** CAA ***Sect of Statute:*** 112[R][7]

Classification: Moderate ***Program:*** Risk Management Progra ***Citation:*** 40 CFR

Violation Type: Safety Instructions/Mmgt. Safety ***Cite Sect:*** ***Cite Part:*** 68

Enforcement Action: Final Order With Penalty

TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

IN THE MATTER OF AN	**§**	**BEFORE THE**
ENFORCEMENT ACTION	**§**	
CONCERNING	**§**	**TEXAS COMMISSION ON**
INEOS AMERICAS LLC	**§**	
RN100213958	**§**	**ENVIRONMENTAL QUALITY**

AGREED ORDER
DOCKET NO. 2025-1652-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 INEOS Americas LLC (the "Respondent") under the authority of TEX. HEALTH & SAFETY CODE ch. 382 and TEX. WATER CODE ch. 7. The Executive Director of the TCEQ, through the Enforcement Division, and the Respondent together stipulate that:

1. The Respondent owns and operates a chemical manufacturing plant located at 3503 Pasadena Freeway in Pasadena, Harris 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 $17,750 is assessed by the Commission in settlement of the violations alleged in Section II ("Allegations"). The Respondent paid $14,200 of the penalty and $3,550 is deferred contingent upon the Respondent's timely and satisfactory compliance with all the terms of this Order. The deferred amount shall be waived only upon full compliance with all the terms and conditions contained in this Order. If the Respondent fails to timely and satisfactorily comply with any of the terms or requirements contained in this Order, the Executive Director may demand payment of all or part of the deferred penalty amount.

5. The Executive Director and the Respondent agree on a settlement of the matters alleged in this enforcement action, subject to final approval in accordance with 30 TEX. ADMIN. CODE § 70.10(a). Any notice and procedures, which might otherwise be authorized or required in this action, are waived in the interest of a more timely resolution of the matter.

6. The Executive Director may, without further notice or hearing, refer this matter to the Office of the Attorney General of the State of Texas ("OAG") for further enforcement proceedings if the Executive Director determines that the Respondent has not complied with one or more of the terms or conditions in this Order.

7. This Order represents the complete and fully integrated agreement of the parties. The provisions of this Order are deemed severable and, if a court of competent jurisdiction or other appropriate authority deems any provision of this Order unenforceable, the remaining provisions shall be valid and enforceable.

8. This Order shall terminate five years from its effective date or upon compliance with all the terms and conditions set forth in this Order, whichever is later.

9. Executive Director recognizes that by September 1, 2025, the Respondent ensured that all changes that remove a layer of protection are subject to Management of Change that includes what additional layers of protection are then needed, inspected all Spec 34 tubing in the plant and corrected any with unions in straight tubing runs, and installed new area Lower Explosive Limit monitors for earlier detections of spills and releases in order to prevent the recurrence of emissions events due to the same or similar causes as Incident No. 425347.

II. ALLEGATIONS

During a record review for the Plant conducted on October 2, 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 Permit No. 4825A, Special Conditions No. 1, Federal Operating Permit No. O1621, General Terms and Conditions and Special Terms and Conditions No. 18, and TEX. HEALTH & SAFETY CODE § 382.085(b). Specifically, the Respondent released 7,634.00 pounds of benzene as fugitive emissions during an emissions event (Incident No. 425347) that occurred on June 21, 2024 and lasted one hour and four minutes.

III. DENIALS

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

IV. ORDERING PROVISIONS

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

1. The Respondent is assessed a penalty as set forth in Section I, Paragraph No. 4. The payment of this penalty and the Respondent's compliance with all of the requirements set forth in this Order resolve only the allegations in Section II. The Commission shall not be constrained in any manner from requiring corrective action or penalties for violations which are not raised here. Penalty payments shall be made payable to "TCEQ" and shall be sent with the notation "Re: INEOS Americas LLC, Docket No. 2025-1652-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. All relief not expressly granted in this Order is denied.

3. 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.

4. 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.

5. 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.

6. 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.

7. 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

Kristie Mello-Jurack 06/11/2026
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.

_____ 3/17/26
Signature Date

Michael Mayer Site Manager
Name (Printed or typed) Title
Authorized Representative of
INEOS Americas LLC

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

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