

Responses to TNOD #1
For RCRA Permit/Compliance Plan Renewal Application
Hazardous Waste Permit/Compliance Plan No. 50264
Industrial Solid Waste Registration No. 35921
Tracking No. 30613474; RN105087829/CN601688781

Appendix III.A
TCEQ Comment ID No. 1
Provide the facility names of the subsidiaries on Appendix III.A.
Dow Response to Comment ID No. 1
As requested, Dow has added the facility names of the subsidiaries on Appendix III.A.
Action Taken by Dow in Application
The facility names of the subsidiaries are included on Appendix III.A.
Appendix III.C
TCEQ Comment ID No. 2
In Appendix III.C of the application, provide a map showing the location of security features such as fences, gates and natural barriers.
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See revised Appendix III.C for map and text describing fences and natural barriers.
Part B, Appendix IV, Table IV.B
TCEQ Comment ID No. 3
The EPA waste codes in Table IV.B. do not match the waste codes in the facility's NOR. Please clarify which waste codes are correct and provide revisions to the application as needed.
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The waste codes provided in Table IV.B reflect the available information from the 1993 issued Permit and retained in the 2004 and 2015 issued Permits. The four regulated units were certified closed in 1987 by Union Carbide Corporation (UCC). NOR Units No. 009 and 005 were certified closed with waste left in place. NOR Units No. 002 and 018 were certified closed with no waste left in place. UCC was acquired by The Dow Chemical Company in 2001. Therefore, Dow's NOR reflects the available waste information at the time of the site acquisition. Dow believes that Table IV.B accurately reflects historical waste information that were managed within the permitted units.
Action Taken by Dow in Application
No action required. See responses above.



Texas Commission on Environmental Quality Waste Permits Division Correspondence Cover Sheet

Date: July 09, 2025

Facility Name: Union Carbide Corporation, Off-Plant
Disposal Area

Permit or Registration No.: HW-50264

Nature of Correspondence:

☐ Initial/New

☒ Response/Revision to TCEQ Tracking No.:
30613474 (from subject line of TCEQ letter
regarding initial submission)

Affix this cover sheet to the front of your submission to the Waste Permits Division. Check appropriate box for type of correspondence. Contact WPD at (512) 239-2335 if you have questions regarding this form.

Table 1 - Municipal Solid Waste Correspondence

Applications	Reports and Notifications
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<input type="checkbox"/> New Registration (including Subchapter T)	<input type="checkbox"/> Groundwater Alternate Source Demonstration
<input type="checkbox"/> Major Amendment	<input type="checkbox"/> Groundwater Corrective Action
<input type="checkbox"/> Minor Amendment	<input type="checkbox"/> Groundwater Monitoring Report
<input type="checkbox"/> Limited Scope Major Amendment	<input type="checkbox"/> Groundwater Background Evaluation
<input type="checkbox"/> Notice Modification	<input type="checkbox"/> Landfill Gas Corrective Action
<input type="checkbox"/> Non-Notice Modification	<input type="checkbox"/> Landfill Gas Monitoring
<input type="checkbox"/> Transfer/Name Change Modification	<input type="checkbox"/> Liner Evaluation Report
<input type="checkbox"/> Temporary Authorization	<input type="checkbox"/> Soil Boring Plan
<input type="checkbox"/> Voluntary Revocation	<input type="checkbox"/> Special Waste Request
<input type="checkbox"/> Subchapter T Disturbance Non-Enclosed Structure	<input type="checkbox"/> Other:
<input type="checkbox"/> Other:	

Table 2 - Industrial & Hazardous Waste Correspondence

Applications	Reports and Responses
<input type="checkbox"/> New	<input type="checkbox"/> Annual/Biennial Site Activity Report
<input checked="" type="checkbox"/> Renewal	<input type="checkbox"/> CPT Plan/Result
<input type="checkbox"/> Post-Closure Order	<input type="checkbox"/> Closure Certification/Report
<input type="checkbox"/> Major Amendment	<input type="checkbox"/> Construction Certification/Report
<input type="checkbox"/> Minor Amendment	<input type="checkbox"/> CPT Plan/Result
<input type="checkbox"/> CCR Registration	<input type="checkbox"/> Extension Request
<input type="checkbox"/> CCR Registration Major Amendment	<input type="checkbox"/> Groundwater Monitoring Report
<input type="checkbox"/> CCR Registration Minor Amendment	<input type="checkbox"/> Interim Status Change
<input type="checkbox"/> Class 3 Modification	<input type="checkbox"/> Interim Status Closure Plan
<input type="checkbox"/> Class 2 Modification	<input type="checkbox"/> Soil Core Monitoring Report
<input type="checkbox"/> Class 1 ED Modification	<input type="checkbox"/> Treatability Study
<input type="checkbox"/> Class 1 Modification	<input type="checkbox"/> Trial Burn Plan/Result
<input type="checkbox"/> Endorsement	<input type="checkbox"/> Unsaturated Zone Monitoring Report
<input type="checkbox"/> Temporary Authorization	<input type="checkbox"/> Waste Minimization Report
<input type="checkbox"/> Voluntary Revocation	<input type="checkbox"/> Other:
<input type="checkbox"/> 335.6 Notification	
<input type="checkbox"/> Other:	



TCEQ Core Data Form

For detailed instructions on completing this form, please read the Core Data Form Instructions or call 512-239-5175.

SECTION I: General Information

1. Reason for Submission (If other is checked please describe in space provided.)		
<input type="checkbox"/> New Permit, Registration or Authorization (Core Data Form should be submitted with the program application.)		
<input checked="" type="checkbox"/> Renewal (Core Data Form should be submitted with the renewal form)		<input type="checkbox"/> Other
2. Customer Reference Number (if issued)	Follow this link to search for CN or RN numbers in Central Registry**	3. Regulated Entity Reference Number (if issued)
CN 601688781		RN 105087829

SECTION II: Customer Information

4. General Customer Information		5. Effective Date for Customer Information Updates (mm/dd/yyyy)		
<input type="checkbox"/> New Customer <input checked="" type="checkbox"/> Update to Customer Information <input type="checkbox"/> Change in Regulated Entity Ownership <input type="checkbox"/> Change in Legal Name (Verifiable with the Texas Secretary of State or Texas Comptroller of Public Accounts)				
<i>The Customer Name submitted here may be updated automatically based on what is current and active with the Texas Secretary of State (SOS) or Texas Comptroller of Public Accounts (CPA).</i>				
6. Customer Legal Name (If an individual, print last name first: eg: Doe, John)			<i>If new Customer, enter previous Customer below:</i>	
Union Carbide Corporation				
7. TX SOS/CPA Filing Number	8. TX State Tax ID (11 digits) 11314217305	9. Federal Tax ID (9 digits) 980626782	10. DUNS Number (if applicable)	
11. Type of Customer:	<input checked="" type="checkbox"/> Corporation	<input type="checkbox"/> Individual	Partnership: <input type="checkbox"/> General <input type="checkbox"/> Limited	
Government: <input type="checkbox"/> City <input type="checkbox"/> County <input type="checkbox"/> Federal <input type="checkbox"/> Local <input type="checkbox"/> State <input type="checkbox"/> Other		<input type="checkbox"/> Sole Proprietorship	<input type="checkbox"/> Other:	
12. Number of Employees <input type="checkbox"/> 0-20 <input type="checkbox"/> 21-100 <input checked="" type="checkbox"/> 101-250 <input type="checkbox"/> 251-500 <input type="checkbox"/> 501 and higher		13. Independently Owned and Operated? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		
14. Customer Role (Proposed or Actual) – as it relates to the Regulated Entity listed on this form. Please check one of the following				
<input type="checkbox"/> Owner <input type="checkbox"/> Operator <input checked="" type="checkbox"/> Owner & Operator <input type="checkbox"/> Other: <input type="checkbox"/> Occupational Licensee <input type="checkbox"/> Responsible Party <input type="checkbox"/> VCP/BSA Applicant				
15. Mailing Address:	3301 5 th Avenue South			
	City	State	ZIP	ZIP + 4
	Texas City	TX	77590	8121
16. Country Mailing Information (if outside USA)			17. E-Mail Address (if applicable)	

18. Telephone Number (304) 747-5308	19. Extension or Code	20. Fax Number (if applicable) () -
---	------------------------------	--

SECTION III: Regulated Entity Information

21. General Regulated Entity Information (If "New Regulated Entity" is selected, a new permit application is also required.)							
<input type="checkbox"/> New Regulated Entity <input type="checkbox"/> Update to Regulated Entity Name <input checked="" type="checkbox"/> Update to Regulated Entity Information							
<i>The Regulated Entity Name submitted may be updated, in order to meet TCEQ Core Data Standards (removal of organizational endings such as Inc, LP, or LLC).</i>							
22. Regulated Entity Name (Enter name of the site where the regulated action is taking place.)							
Union Carbide Corporation							
23. Street Address of the Regulated Entity: (No PO Boxes)	2800 Loop 197 South						
	City	Texas City	State	TX	ZIP	77590	ZIP + 4
24. County	Galveston						

If no Street Address is provided, fields 25-28 are required.

25. Description to Physical Location:	The Union Carbide Corporation, Texas City Site, is located on the east side of Loop 197, to the south of the Texas City Industrial Ship Channel in Texas City, Galveston County, Texas.						
26. Nearest City				State		Nearest ZIP Code	
Texas City				TX		77590	
<i>Latitude/Longitude are required and may be added/updated to meet TCEQ Core Data Standards. (Geocoding of the Physical Address may be used to supply coordinates where none have been provided or to gain accuracy).</i>							
27. Latitude (N) In Decimal:			28. Longitude (W) In Decimal:				
Degrees	Minutes	Seconds	Degrees	Minutes	Seconds		
29	21	27	94	54	20		
29. Primary SIC Code (4 digits)		30. Secondary SIC Code (4 digits)		31. Primary NAICS Code (5 or 6 digits)		32. Secondary NAICS Code (5 or 6 digits)	
2869				325199			
33. What is the Primary Business of this entity? (Do not repeat the SIC or NAICS description.)							
Chemicals Manufacturing							
34. Mailing Address:	3301 5 th Avenue South						
	City	Texas City	State	TX	ZIP	77590	ZIP + 4 8121
35. E-Mail Address:		MVetterlein@dow.com					
36. Telephone Number		37. Extension or Code			38. Fax Number (if applicable)		
(304) 747-5308					() -		

39. TCEQ Programs and ID Numbers Check all Programs and write in the permits/registration numbers that will be affected by the updates submitted on this form. See the Core Data Form instructions for additional guidance.

<input type="checkbox"/> Dam Safety	<input type="checkbox"/> Districts	<input type="checkbox"/> Edwards Aquifer	<input type="checkbox"/> Emissions Inventory Air	<input checked="" type="checkbox"/> Industrial Hazardous Waste
				35921/HW-50264
<input type="checkbox"/> Municipal Solid Waste	<input type="checkbox"/> New Source Review Air	<input type="checkbox"/> OSSF	<input type="checkbox"/> Petroleum Storage Tank	<input type="checkbox"/> PWS
<input type="checkbox"/> Sludge	<input type="checkbox"/> Storm Water	<input type="checkbox"/> Title V Air	<input type="checkbox"/> Tires	<input type="checkbox"/> Used Oil
<input type="checkbox"/> Voluntary Cleanup	<input type="checkbox"/> Wastewater	<input type="checkbox"/> Wastewater Agriculture	<input type="checkbox"/> Water Rights	<input type="checkbox"/> Other:

SECTION IV: Preparer Information

40. Name:	Michelle Veterlein	41. Title:	Texas Waste and ComplianceManager
42. Telephone Number	43. Ext./Code	44. Fax Number	45. E-Mail Address
(304) 747-5308		() -	

SECTION V: Authorized Signature

46. By my signature below, I certify, to the best of my knowledge, that the information provided in this form is true and complete, and that I have signature authority to submit this form on behalf of the entity specified in Section II, Field 6 and/or as required for the updates to the ID numbers identified in field 39.

Company:	The Dow Chemical Company	Job Title:	Senior Responsible Care Director
Name (In Print):	Casey Rhodes	Phone:	(281) 228- 2606
Signature:		Date:	7/09/2025



Texas Commission on Environmental Quality
Waste Permits Division Correspondence
Cover Sheet

RECEIVED

JUL 03 2025

WASTE PERMITS DIVISION
TEXAS COMMISSION ON
ENVIRONMENTAL QUALITY

Date: July 2, 2025

Facility Name: Union Carbide Corporation, Off-Plant
Disposal Area

Permit or Registration No.: HW-50264

Nature of Correspondence:

☐ Initial/New

☒ Response/Revision to TCEQ Tracking No.:
30613474 (from subject line of TCEQ letter
regarding initial submission)

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<input type="checkbox"/> Voluntary Revocation	<input type="checkbox"/> Special Waste Request
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<input type="checkbox"/> Other:	

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<input type="checkbox"/> Voluntary Revocation	<input type="checkbox"/> Other:
<input type="checkbox"/> 335.6 Notification	
<input type="checkbox"/> Other:	

Part A and Part B Signature Pages

Signature Page

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Operator Signature: _____ Date: _____

Name and Official Title (type or print): _____

Operator Signature: _____ Date: _____

Name and Official Title (type or print): _____

Operator Signature: _____ Date: _____

Name and Official Title (type or print): _____

Owner Signature: *[Signature]* Date: 07/01/2025

Name and Official Title (type or print): Casey Rhodes Responsible Care Leader

To be completed by the operator if the application is signed by an authorized representative for the operator

I, _____ hereby designate _____
(operator) (authorized representative)

as my representative and hereby authorize said representative to sign any application, submit additional information as may be requested by the Commission; and/or appear for me at any hearing or before the Texas Commission on Environmental Quality in conjunction with this request for a Texas Water Code or Texas Solid Waste Disposal Act permit. I further understand that I am responsible for the contents of this application, for oral statements given by my authorized representative support of the application, and for compliance with the terms and conditions of any permit which might be issued based upon this application.

Printed or Typed Name of Operator or Principal Executive Officer

Signature

(Note: Application Must Bear Signature & Seal of Notary Public)

Subscribed and sworn to before me by the said Casey Rhodes on this
1st day of July, 2025.

My commission expires of the 27th day of October, 2027



Carla m. Perez
Notary Public in and for Harris County, Texas

Signature Page

I, Casey Rhodes, Responsible Care Leader,
(Operator) (Title)

certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Signature: [Signature] Date: 07/01/2025

To be completed by the Operator if the application is signed by an Authorized Representative for the Operator

I, _____, hereby designate _____
[Print or Type Name] [Print or Type Name]

as my representative and hereby authorize said representative to sign any application, submit additional information as may be requested by the Commission; and/or appear for me at any hearing or before the Texas Commission on Environmental Quality in conjunction with this request for a Texas Water Code or Texas Solid Waste Disposal Act permit. I further understand that I am responsible for the contents of this application, for oral statements given by my authorized representative in support of the application, and for compliance with the terms and conditions of any permit which might be issued based upon this application.

Printed or Typed Name of Operator or Principal Executive Officer _____

Signature _____

SUBSCRIBED AND SWORN to before me by the said Casey Rhodes

On this 1st day of July, 2025

My commission expires on the 27th day of October, 2027

Notary Public in and for Harris County, Texas
[Note: Application Must Bear Signature & Seal of Notary Public]

Carla M. Perez



OPDA TNOD 1 IHW Responses Submitted April 24, 2025

RE: Tracking No. 30613474 - TECHNICAL NOD1 Permit Renewal 50264 Union Carbide Corporation

From Vetterlein, Michelle (MM [REDACTED])
Date Thu 4/24/2025 11:35 AM
To Yahaira Reyes [REDACTED]
Cc Eun Ju Lee [REDACTED]; Trevino, Richard [REDACTED]; Belote, Donnie (DD) [REDACTED]

 2 attachments (2 MB)

OPDA_50264_TNOD1_Responses_Final.pdf; OPDA_50264_TNOD_1_ReplacementPages.pdf;

Arcadis Warning: Exercise caution with email messages from external sources such as this message. Always verify the sender and avoid clicking on links or scanning QR codes unless certain of their authenticity.

Good afternoon.

Attached please find the Union Carbide Responses and replacement pages that address Technical NOD1 on RCRA Permit Renewal 50264.

Please reach out if you have any questions.

Kind Regards,

Michelle Vetterlein

Michelle Vetterlein

Texas Waste Compliance and Permit Manager
Regulatory Affairs Leader PA-DE

Dow Chemical

phone: 304-747-5308 | email: [REDACTED]



General Business

From [REDACTED]
Sent [REDACTED]
To [REDACTED]
Cc [REDACTED]
Subject: Tracking No. 30613474 - TECHNICAL NOD1 Permit Renewal 50264 Union Carbide Corporation

[REDACTED]

and that this email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Union Carbide Corporation – Texas, Galveston County
Hazardous Waste Permit No. **50264**
Industrial Solid Waste Registration No. 35921/50264
EPA Identification No. TXD 980626782
Tracking No.30613474; RN105087829/ CN601688781

Good day Ms. Vetterlein,

Our review of your renewal application indicates that additional information must be presented to demonstrate compliance with Title 30 Texas Administrative Code (TAC) Sections (§§)305.45 and 305.50. Please address the following items for UCC Permit No.50264 Renewal:

- Provide the facility names of the subsidiaries on Appendix III.A.
- In Appendix III.C of the application, provide a map showing the location of security features such as fences, gates and natural barriers.
- The EPA waste codes in Table IV.B. do not match the waste codes in the facility's NOR. Please clarify which waste codes are correct and provide revisions to the application as needed.

Thank you for your time,

Yahaira Reyes

Chemist

Industrial and Hazardous Waste Permits Section | Waste Permits Division | TCEQ

[REDACTED]
(512)-239-6013

Please take a couple of minutes to participate in our survey,

www.tceq.texas.gov/goto/customersurvey

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For RCRA Permit/Compliance Plan Renewal Application
Hazardous Waste Permit/Compliance Plan No. 50264
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Action Taken by Dow in Application
No action required. See responses above.

Appendix III.A

Compliance History – List of Dow Facilities in Texas

1. Union Carbide Corporation, [Dow Texas City Off-Plant Disposal Area \(OPDA\) Operations](#)
A Wholly Owned Subsidiary of The Dow Chemical Company
2800 Loop 197 South
Texas City, Texas 77592
2. Union Carbide Corporation, [Dow Texas City Operations](#)
A Wholly Owned Subsidiary of The Dow Chemical Company
3301 5th Avenue South
Texas City, Texas 77590-8121
3. Union Carbide Corporation, [Dow Seadrift Operations](#)
A Wholly Owned Subsidiary of The Dow Chemical Company
Highway 185 N
Seadrift, Texas 77983
4. The Dow Chemical Company, [Dow](#) La Porte Operations
550 Independence Parkway South
La Porte, TX 77572-0685
5. The Dow Chemical Company, Texas Operations (Plants A, B, and Oyster Creek)
2301 North Brazosport Blvd.
Freeport, TX 77541-3257
6. Rohm and Haas Chemicals LLC, [Dow Bayport Operations](#)
A Wholly Owned Subsidiary of The Dow Chemical Company
Bayport Plant
13300 Bay Area Boulevard
La Porte, TX 77571
7. Rohm and Haas Texas Inc., [Dow Deer Park Operations](#)
A Wholly Subsidiary of The Dow Chemical Company
1900 Tidal Road
Deer Park, TX 77536
8. Rohm and Haas Texas Inc., [Dow Lone Star Operations](#)
A Wholly Subsidiary of The Dow Chemical Company
Lone Star Plant
1800 Tidal Road
Deer Park, TX 77536
9. The Dow Chemical Company, [Dow](#) Sabine River Operations
3055 Farm to Market (FM) Road 1006
Orange, Texas 77630

Appendix III.A

Compliance History – List of Dow Facilities in Texas

1. Union Carbide Corporation, Dow Texas City Off-Plant Disposal Area (OPDA) Operations
A Wholly Owned Subsidiary of The Dow Chemical Company
2800 Loop 197 South
Texas City, Texas 77592
2. Union Carbide Corporation, Dow Texas City Operations
A Wholly Owned Subsidiary of The Dow Chemical Company
3301 5th Avenue South
Texas City, Texas 77590-8121
3. Union Carbide Corporation, Dow Seadrift Operations
A Wholly Owned Subsidiary of The Dow Chemical Company
Highway 185 N
Seadrift, Texas 77983
4. The Dow Chemical Company, Dow La Porte Operations
550 Independence Parkway South
La Porte, TX 77572-0685
5. The Dow Chemical Company, Texas Operations (Plants A, B, and Oyster Creek)
2301 North Brazosport Blvd.
Freeport, TX 77541-3257
6. Rohm and Haas Chemicals LLC, Dow Bayport Operations
A Wholly Owned Subsidiary of The Dow Chemical Company
Bayport Plant
13300 Bay Area Boulevard
La Porte, TX 77571
7. Rohm and Haas Texas Inc., Dow Deer Park Operations
A Wholly Subsidiary of The Dow Chemical Company
1900 Tidal Road
Deer Park, TX 77536
8. Rohm and Haas Texas Inc., Dow Lone Star Operations
A Wholly Subsidiary of The Dow Chemical Company
Lone Star Plant
1800 Tidal Road
Deer Park, TX 77536
9. The Dow Chemical Company, Dow Sabine River Operations
3055 Farm to Market (FM) Road 1006
Orange, Texas 77630

**Appendix III.C
Facility-Wide Security**

Table of Contents

1.0 Security 1-1

1.0 Facility Security

The OPDA facility is inactive and is protected by ~~a two (2)~~ fences. ~~One fence is~~ located on the west facility boundary ~~(along Basin 3)~~. ~~The second fence acts as a barrier to the Barge Marshalling Area (east side of Basin 2, north of Basin 5) just south of the Industrial Ship Channel. Additionally, and~~ natural barriers including the Industrial Ship Canal, Hurricane Outflow Canal, and Galveston Bay on the north, south, and east facility boundaries, respectively. ~~Each~~The fence is a six-foot high chain-link fence topped with barbed wire that separates the OPDA facility from the adjacent Oiltanking facility ~~and the Barge Marshalling Area~~.

The waste management units are located within the OPDA facility boundary and there is only one entrance gate to the facility. The entrance gate is locked and only authorized personnel are allowed to enter the OPDA facility. There are warning signs posted at the entry points to the waste management units. The signs are visible from all angles of approach to the waste management units and are legible from a distance of twenty-five (25) feet.

Tables/Figures/Drawings for Facility-Wide Security

Tables

None

Figures

~~None~~ [Figure 1 – Site Security features, Off-Plant Disposal Area \(OPDA\)](#)

Drawings

None

Appendices to Facility-Wide Security

None

Appendix III.C Facility-Wide Security

Table of Contents

1.0	Security	1-1
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1.0 Facility Security

The OPDA facility is inactive and is protected by two (2) fences. One fence is located on the west facility boundary (along Basin 3). The second fence acts as a barrier to the Barge Marshalling Area (east side of Basin 2, north of Basin 5) just south of the Industrial Ship Channel. Additionally, natural barriers including the Industrial Ship Canal, Hurricane Outflow Canal, and Galveston Bay on the north, south, and east facility boundaries, respectively. Each fence is a six-foot high chain-link fence topped with barbed wire that separates the OPDA facility from the adjacent Oiltanking facility and the Barge Marshalling Area.

The waste management units are located within the OPDA facility boundary and there is only one entrance gate to the facility. The entrance gate is locked and only authorized personnel are allowed to enter the OPDA facility. There are warning signs posted at the entry points to the waste management units. The signs are visible from all angles of approach to the waste management units and are legible from a distance of twenty-five (25) feet.

Tables/Figures/Drawings for Facility-Wide Security

Tables

None

Figures

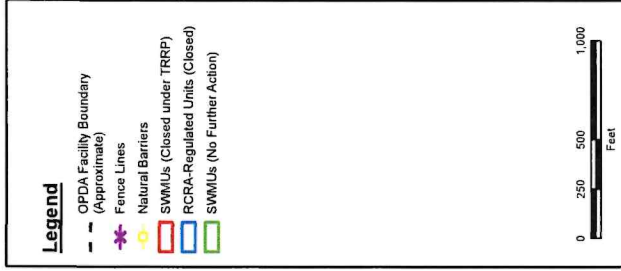
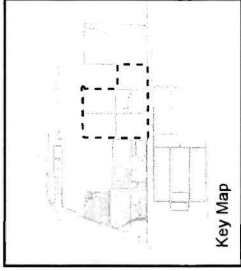
Figure 1 – Site Security features, Off-Plant Disposal Area (OPDA)

Drawings

None

Appendices to Facility-Wide Security

None



**Appendix III.C.3
Figure 1
Site Security Features
Off-Plant Disposal Area (OPDA)**

Union Carbide Corporation
OPDA Facility
HW Permit No. 50264
March 2025

DOW
ARCADIS

OPDA TNOD 1 CP Responses Submitted May 20, 2025

From: Michael Duffi [REDACTED]
Sent: Monday, May 5, 2025 9:16 AM
To: Belote, Donnie ([REDACTED])
[REDACTED]

Subject: Union Carbide_NOD1 Compliance Plan

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Donnie,

Please see the attached letter and NOD Table.

Union Carbide_NOD1 Compliance Plan

From Vetterlein, Michelle (MM) [REDACTED]

Date Tue 5/20/2025 10:28 AM

To [REDACTED]

Cc [REDACTED]

 2 attachments (5 MB)

OPDA_50264_TNOD1_CP_Responses_FINAL.pdf; OPDA_TNOD1_CP_ReplacementPages.pdf;

Arcadis Warning: Exercise caution with email messages from external sources such as this message. Always verify the sender and avoid clicking on links or scanning QR codes unless certain of their authenticity.

Good afternoon.

Attached please find the Union Carbide Responses and replacement pages that address TNOD1-CP on RCRA Permit Renewal 50264.

Please reach out if you have any questions.

Kind Regards,

Michelle Vetterlein

Michelle Vetterlein

Texas Waste Compliance and Permit Manager

Regulatory Affairs Leader PA-DE

Dow Chemical

phone: 304-747-5308 | email [REDACTED]



General Business

Responses to TNOD #1 – Compliance Plan
For RCRA Permit/Compliance Plan Renewal Application
Hazardous Waste Permit/Compliance Plan No. 50264
Industrial Solid Waste Registration No. 35921
Tracking No. 30613474; RN105087829/CN601688781

Part B, Section XI, CP Tables
TCEQ Comment ID No. CP1
The unit names provided on the CP Tables for the OPDA Basins are inconsistent with the unit names listed on CP Table I. Please revise the unit names to list the correct name for each unit, e.g., OPDA Basin #.
Dow Response to Comment ID No. CP1
According to the CP Tables submitted in Rev. 0, the only table that lists the OPDA Basins differently is CP Table IX. Therefore, where mentioned, the words have been updated to read OPDA Basin No. (1,2,3,4, or 5).
Action Taken by Dow in Application
See revised CP Table IX with updated unit names.
Part B, Section XI, CP Attachment A, Sheets 1 of 3, 2 of 3, and 3 of 3
TCEQ Comment ID No. CP2
The three sheets are given in both black and white and in color. Please remove the three sheets in color.
Dow Response to Comment ID No. CP2
Dow has removed the three sheets provided in color from Appendix XI.A, CP Attachment A, Sheets 1 of 3, 2 of 3, and 3 of 3.
Action Taken by Dow in Application
See revised Appendix XI.A, CP Attachment A sheets for black and white sheets.
Part B, Section XI, CP Attachment A, Sheets 2 of 3 and 3 of 3
TCEQ Comment ID No. CP3
Revise the off-site property owner's name from Oiltanking Texas City, L.P. to Advario.
Dow Response to Comment ID No. CP3
Oiltanking Texas City, L.P. is the correct property owner according to the Galveston County Real Property records. Dow acknowledges that Advario (a subsidiary of Oiltanking) is the current operator of the property west of the OPDA Facility. Therefore, as requested, Dow has updated the facility name to Advario on CP Attachment A Sheets 2 and 3. Sheet 1 was also updated to note Advario Texas City, L.P. as the adjacent facility name.
Action Taken by Dow in Application
See revised CP Attachment A sheets showing the current operator Advario.
Part B, Section XI, CP Table VI
TCEQ Comment ID No. CP4
Please provide a separate table for each of the RCRA-Regulated Units. A table was not included for OPDA Basin No. 5, the North Phase Separation Organic Pit, and the South Phase Separation Organic Pit.
Dow Response to Comment ID No. CP4
Dow has created a separate CP Table VI for each RCRA-Regulated Unit (Basin No. 5, the North Phase Separation Organic Pit, and the South Phase Separation Organic Pit).
Action Taken by Dow in Application
See updated CP Table VI for each RCRA-Regulated Unit provided in this response.

Response to TNOD #1
Compliance Plan
Replacement Pages

Part B
Appendix XI – CP Tables

CP Table VI: Compliance Period and Post Closure Period for RCRA-Regulated Units

OPDA Basin No. 3	Year or Number of Years
Year Waste Management Activities Initiated	1952
Year Closed	1987
Compliance Period	35 Years
Compliance Period Begin Date	1993
Compliance Period End Date	2028
Post Closure Care Period	30 Years
Post Closure Care Period Begin Date	1987
Post Closure Care Period End Date	2017

CP Table VI: Compliance Period and Post Closure Period for RCRA-Regulated Units

OPDA Basin No. 5	Year or Number of Years
Year Waste Management Activities Initiated	1966
Year Closed	1987
Compliance Period	21 Years
Compliance Period Begin Date	1993
Compliance Period End Date	2014
Post Closure Care Period	30 Years
Post Closure Care Period Begin Date	1987
Post Closure Care Period End Date	2017

CP Table VI: Compliance Period and Post Closure Period for RCRA-Regulated Units

OPDA North Phase Separation Organic Pit	Year or Number of Years
Year Waste Management Activities Initiated	1978
Year Closed	1987
Compliance Period	9 Years
Compliance Period Begin Date	1993
Compliance Period End Date	2002
Post Closure Care Period	30 Years
Post Closure Care Period Begin Date	1987
Post Closure Care Period End Date	2017

CP Table VI: Compliance Period and Post Closure Period for RCRA-Regulated Units

OPDA South Phase Separation Organic Pit	Year or Number of Years
Year Waste Management Activities Initiated	1978
Year Closed	1987
Compliance Period	9 Years
Compliance Period Begin Date	1993
Compliance Period End Date	2002
Post Closure Care Period	30 Years
Post Closure Care Period Begin Date	1987
Post Closure Care Period End Date	2017

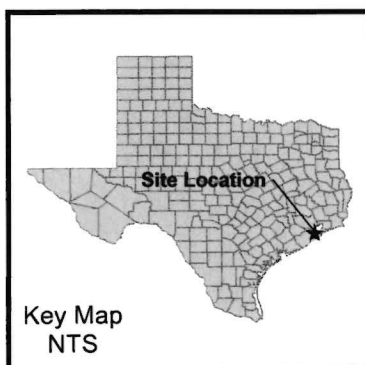
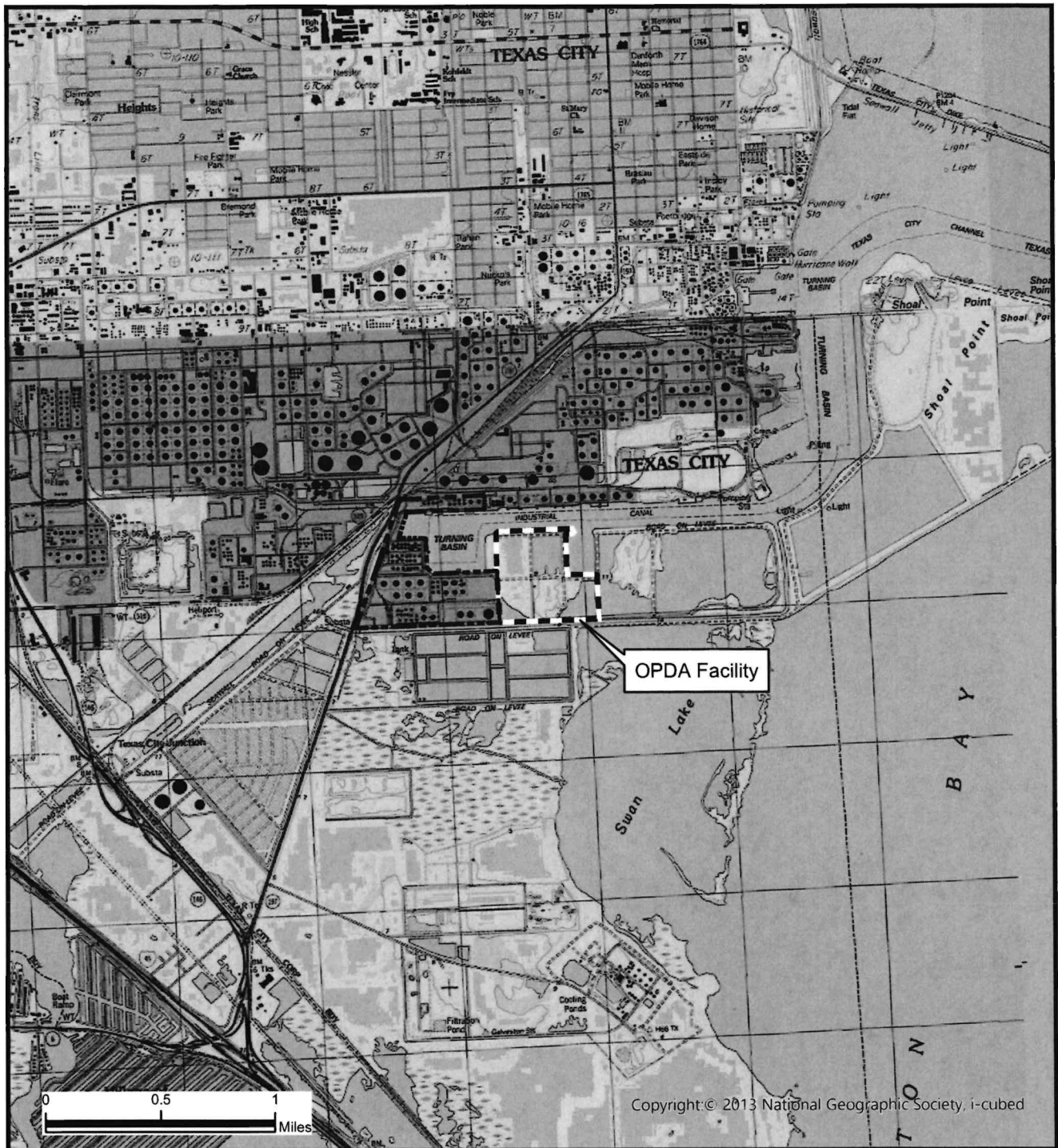
CP Table IX: Description of Uppermost Aquifer

The term "Uppermost Aquifer" as referenced in this Compliance Plan refers to the


Zone III, the -30 ft MSL aquifer, consists of silty sand, sand, and silt. It is the uppermost aquifer beneath the OPDA and is laterally continuous beneath most of the OPDA and becomes discontinuous beneath the OPDA Basin No. 2 at the northeast corner. This zone ranges in thickness from 0 to 30 feet beneath the OPDA with an average thickness of 20 feet. It is underlain by Zone IV. The top of Zone III dips slightly to the south with elevations ranging from -10 to -15 ft MSL. The base of Zone III dips to the south and west over OPDA Basins No. 3 and No. 4. The aquifer then pinches out as it passes the boundary to the former Marine Terminal area. Groundwater flow is divided across the central portion of the site that causes groundwater to flow generally towards the northeast in OPDA Basins No. 2 and No. 4, and towards the south-southwest near OPDA Basins No. 1, No. 3, and No. 5. The groundwater flow generally trended northward in the direction of the Texas City Industrial Ship Channel (north of the divide) and to the south toward the Gulf Coast Waste Disposal Authority Facility (south of the divide).


Part B

Appendix XI – CP Attachment A



LEGEND

 OPDA Facility Boundary

 Advorio Texas City, L.P. Facility

Reference: The displayed Digital Raster Graphic (DRG) includes portions of the United States Geological Survey 7.5 minute quadrangles of Virginia Point and Texas City (USGS, 1993).

**CP Attachment A
Sheet 1 of 3
Facility Site Map**

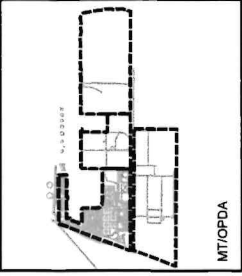
Union Carbide Corporation
OPDA Facility
HW Permit No. 50264
May 2025



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Legend

- OPDA Facility Boundary
- Notice of Registration (NOR) Unit Boundary

Notes:

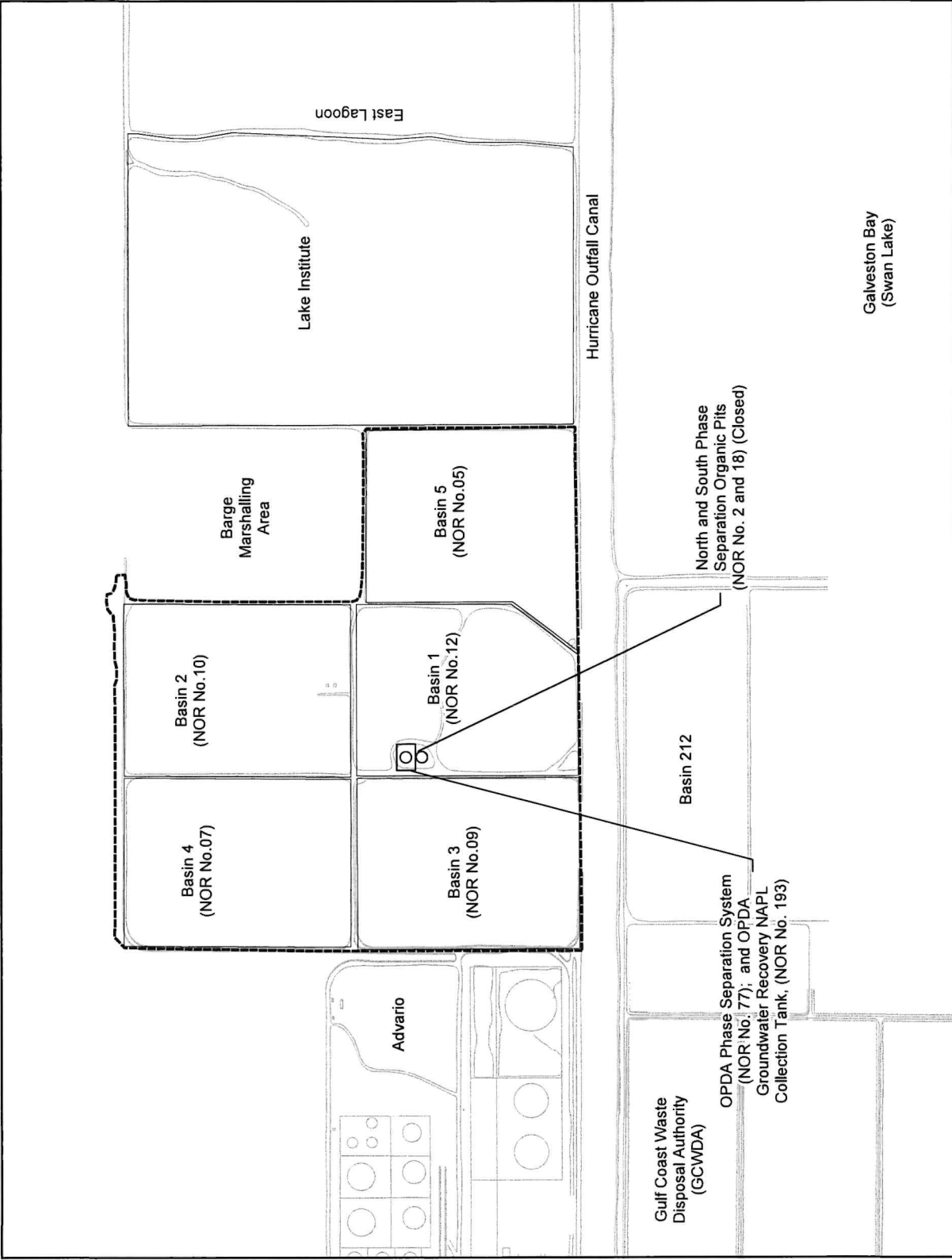
- Active NOR units located on Oil Tanking were transferred to Oil Tanking when the property was sold on July 1, 2004. See CP Table II for regulatory status.
- SWMUs and Regulated Units (with NOR No. shown) on OPDA facility is listed in the CP Table 1 and Table II.

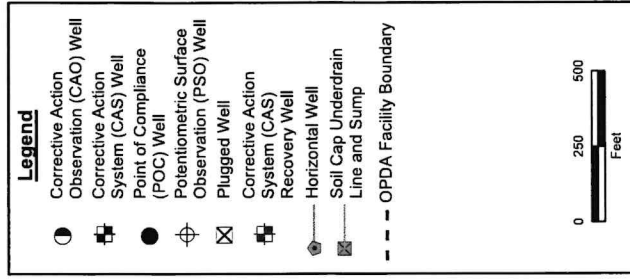
0 300 600
Feet

CP Attachment A
Sheet 2 of 3
Locations of SWMUs

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May 2025

N





<p>CP Attachment A Sheet 3 of 3 Proposed Groundwater Corrective Action and Monitoring Network Union Carbide Corporation OPDA Facility HW Permit No. 50264 May 2025</p>	