

Bryan W. Shaw, Ph.D., *Chairman*
Buddy Garcia, *Commissioner*
Carlos Rubinstein, *Commissioner*
Mark R. Vickery, P.G., *Executive Director*



TEXAS COMMISSION ON ENVIRONMENTAL QUALITY
Protecting Texas by Reducing and Preventing Pollution

October 17, 2011

MR MICHAEL GAMBRELL
VICE PRESIDENT MANUFACTURING & ENGINEERING
THE DOW CHEMICAL COMPANY
2030 DOW CTR
MIDLAND MI 48674-0001

Re: Off-Permit/Operational Flexibility Notification Acknowledgment
Permit Number: O1388
Chemicals and Metals (1)
Freeport, Brazoria County
Regulated Entity Number: RN100225945
Customer Reference Number: CN600356976
Account Number: BL-0082-R

RECEIVED

OCT 20 2011

TCEQ
CENTRAL FILE ROOM

Dear Mr. Gambrell:

The Texas Commission on Environmental Quality (TCEQ) has received your notification dated September 30, 2011, in accordance with Title 30 Texas Administrative Code § 122.222 (30 TAC § 122.222) for the above-referenced permit.

Based on an evaluation of the submitted information, we have determined that the action described in the notification satisfies the criteria specified in 30 TAC § 122.222. Please maintain a copy of this letter and all related documentation with your Title V Federal Operating Permit (FOP).

Please note that the above-referenced permit was not changed or revised in response to your notification. It is the applicant's responsibility to submit all required information as indicated in 30 TAC § 122.132, including information describing the changes addressed in the Form OP-Notify (Off-Permit/Operational Flexibility Notification) with the renewal application in order to incorporate the changes resulting from the notification. Although the FOP document has not been updated or revised at this time, please note that the applicable requirements are enforceable as indicated in 30 TAC § 122.143(6).

Mr. Michael Gambrell

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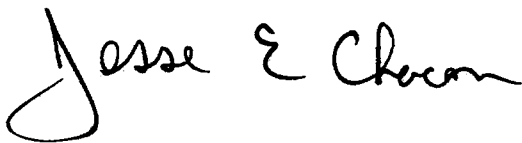
In addition, it is the applicant's responsibility to notify the U.S. Environmental Protection Agency (EPA) Region 6 regarding off-permit/operational flexibility notification requirements as indicated in 30 TAC § 122.222(c). If you have not already done so, notify the EPA Region 6 at the following address:

Air Section Chief (6PD-R)
Region 6
U.S. Environmental Protection Agency
1445 Ross Avenue, Suite 1200
Dallas, Texas 75202-2733

Your cooperation in this matter is appreciated. If you have any questions concerning this off-permit/operational flexibility action, please contact Mr. Thomas Moeller at (512) 239-1423 or Thomas.Moeller@tceq.texas.gov.

This action is taken under authority delegated by the Executive Director of the TCEQ.

Sincerely,



Jesse E. Chacon, P.E., Manager
Operating Permits Section
Air Permits Division
Texas Commission on Environmental Quality

JEC/TM/tm

cc: Mr. Joel Courtwright, Environmental Project Manager, The Dow Chemical Company,
Freeport
Ms. Fran Falcon, EHS Leveraged Delivery Leader - Texas Operations, The Dow Chemical
Company, Freeport
Director, Environmental Health, Brazoria County Health Department, Angleton
Air Section Manager, Region 12 - Houston
Air Permit Section Chief, U.S. Environmental Protection Agency, Region 6-Dallas

Project Number: 16976

APD Correspondence Routing Slip

Company: The Dow Chemical Company

Permit No: O1388

Project No: 16976

Project Type: Op-notify

Admin. Project No: 52269

Processing/Approval

<u>Approval/sign:</u>	<u>Initials</u>	<u>Date</u>
Engineer	TM	10-13-11
Team Leader	KS	10/14
Section Manager		
Steven Hagood		
Mike Wilson		
Steve Hagle		
Executive Dir		

Request/Information

Title V
Letter/Corresp Type: OP-Notify
Letter Doc No: 62185
Letter Doc No: _____
Permit Doc No: _____
Tech Summary: _____
SOB Doc No: _____
SOB To Be Mailed ☐ Yes ☒ No

ED Agenda:

Day 4: _____

Day 14: _____

High Profile: No

Action Type:

Regulated Entity No: RN100225945

Customer Ref No: CN600356976

Admin. Penalty Due?

☐ Yes ☒ No

Initials

SM

Date

10/4/2011

RBLC Required?

☐ Yes

☐ No

Admin Process

Initials

Date

Returned:

8 10/14

Mailed:

8 10/17

Permit Reviewer: Thomas Moeller

Phone Extension: 1423

Comments/Special Instructions

Section Manager Approval:

10/17



September 30, 2011 ✓

The Dow Chemical Company
2301 N. Brazosport Blvd.
Freeport, Texas 77541
USA

CERTIFIED MAIL 7011 1150 0000 8792 8163

RETURN RECEIPT REQUESTED

Mr. Donald Nelon
Air Permit Review Team, MC-163
Texas Commission on Environmental Quality
P.O. Box 13087
Austin, TX 78711-3087



AIR PERMITS DIVISION

OCT 03 2011

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THE DOW CHEMICAL COMPANY CN600356976
DOW TEXAS OPERATIONS FREEPORT 100225945
PERMIT O-01388 DOW CHEMICALS & METALS (1)
OFF-PERMIT NOTIFICATION-CHLORINATED METHANES PLANT

Dear Mr. Nelon:

Purpose

The purpose of this submittal is to meet the requirements for Title V off-permit notification for projects that have been authorized via NSR permit by rule. This submittal fulfills the requirements in 30 TAC §122.222(k), for the Title V Permit O-01388 Dow Chemicals & Metals (1).

**§122.222(k)
Requirements**

- This project will comply with all existing applicable requirements in permit O-01388 and all existing permit terms and conditions. There are no new applicable requirements. The permit by rule §106.373, September 4, 2000 version, which authorizes this project is not currently referenced as cited above, in permit O-01388.
- Dow is not applying for a change in the permit shield
- Dow will keep a record of this notification with the permit. ✓

Attachments

The following items are attached

- OP-CRO1 Certification by Responsible Official
- OP-NOTIFY Project Descriptions and Date of Change
- Table of Emission Units with Emissions

Future Contact

For future correspondence please contact

Yvonne Samson (979) 238-4814 or
FAX (979) 238-0317
e-mail ysamson@dow.com

Sincerely,

Yvonne Samson,
Sr. EH&S Leveraged Delivery Specialist
Bldg. B-101 / Office 104

16976
DFC 10/4/11
SOS ✓

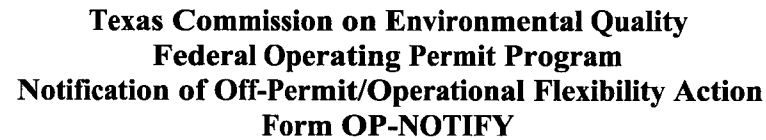
XC:

Air Section Manager

Air Program, OCE/FO Region XII,
5425 Polk Avenue, Suite H, Houston, TX 77023-1486

Environmental Health
Director

Brazoria County Health Department ,111 E. Locust Bldg A-
29, Ste. 270 Angleton, Texas 77515-4642



Action Type	Date of Change	Emission Units Affected	Description of Change (Include deletions/additions in: amount of emissions, types of pollutants emitted, and/or applicable requirements)
OFFPMT	10/22/2011	A18CMFU0B	Changing the refrigerant in the Mechanical Refrigeration Unit (MRU) from R-12 to R-134A
	OK		
			106.373 → NRR

OCT 0

AP

This form is for use by facilities subject to air quality permit requirements and may be revised periodically. (APDG 5771v2)



Form OP-CRO1
Certification by Responsible Official
Federal Operating Permit Program

All initial permit application, revision, renewal, and reopening submittals requiring certification must be addressed using this form. Updates to site operating permit (SOP) and temporary operating permit (TOP) applications, other than public notice verification materials, must be certified prior to authorization of public notice or start of public announcement. Updates to general operating permit (GOP) applications must be certified prior to receiving an authorization to operate under a GOP.

I. IDENTIFYING INFORMATION			
A. RN: 100225945		B. CN: 600356976	
D. Permit No.: O-01388		E. Project No.:	
F. Area Name: Chemicals and Metals (1)			
G. Company Name: The Dow Chemical Company			
II. CERTIFICATION TYPE (Please mark the appropriate box)			
A. <input type="checkbox"/> Responsible Official:		B. <input checked="" type="checkbox"/> Duly Authorized Representative:	
III. SUBMITTAL TYPE (Place an "X" in the appropriate box) (Only one response can be accepted per form)			
<input type="checkbox"/> SOP/TOP Initial Permit Application		<input type="checkbox"/> Update to Permit Application	
<input type="checkbox"/> GOP Initial Permit Application		<input type="checkbox"/> Permit Revision, Renewal, or Reopening	
<input checked="" type="checkbox"/> Other: Off Permit Notification			
IV. CERTIFICATION OF TRUTH			
This certification does not extend to information which is designated by the TCEQ as information for reference only.			
I, <u>Laura Ambrose</u> ✓, certify that I am the <u>DAR</u> for this application (Certifier Name printed or typed) (RO or DAR)			
and that, based on information and belief formed after reasonable inquiry, the statements and information dated during the time period in Section IV.A below, or on the specific date(s) in Section IV.B below, are true, accurate, and complete:			
Note: Enter EITHER a Time Period OR Specific Date(s) for each certification. This section must be completed. The certification is not valid without documentation date(s).			
A. Time Period: From _____ to _____ Start Date* End Date*			
OR			
B. Specific Dates: <u>9/30/2011</u> ✓			
Date 1* Date 2* Date 3* Date 4* Date 5* Date 6* Date 7* Date 8*			
*The Time Period option may only be used when the "Submittal Type" is 'Update to Permit Application' and there are multiple uncertified submittals; or a submittal package has multiple dates recorded in the documentation. Do not use the Time Period option if the "Submittal Type" is 'Other.'			
Signature: <u>[Signature]</u>		Signature Date: <u>9/29/11</u> ✓	
Title: <u>Responsible Care Leader, Texas Operations Freeport</u>			





**Texas Commission on Environmental Quality
Table 1(a) Emission Point Summary**

Permit	PBR 106.373 NSR 5340	RN	100225945	Date	9/9/2011
Company	Dow Chemical Company - Freeport				

AIR CONTAMINANT DATA					
1. Emission Point			2. Component or Air Contaminant Name	3. Air Contaminant Emission Rate	
EPN (A)	FIN (B)	NAME (C)		Pounds per Hour (A)	TPY (B)
A18FU0B	A18CMFU0B	Main Process Fugitive Area	CFC	0.42	1.84

Table 1a