

Jon Niermann, *Chairman*
Emily Lindley, *Commissioner*
Bobby Janecka, *Commissioner*
Toby Baker, *Executive Director*



TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

Protecting Texas by Reducing and Preventing Pollution

June 30, 2021

Prentice James
Regional EH&S Manager
The Dow Chemical Company
332 State Highway 332 East, APB2A1
Lake Jackson, Texas 77566
Via email

Subject: MECT Annual Compliance Report
The Dow Chemical Company
Dow Texas Operations Freeport
Customer Number: CN600356976
Regulated Entity Number: RN100225945
EBT Portfolio Number: P0182
Project Number: 416254

Dear Prentice James:

The Texas Commission on Environmental Quality (TCEQ) has processed the 2020 MECT Annual Compliance Report submitted on March 31, 2021 for compliance with 30 Texas Administrative Code (TAC) §101.359. This processing does not constitute an approval of the emissions quantification methods or results submitted in the site's Annual Compliance Report. A summary of the site's compliance account (portfolio) for the control period is attached.

Additional information regarding this project and the site's portfolio is available online at https://www2.tceq.texas.gov/airperm/index.cfm?fuseaction=ebt_dpa.start. If you have questions concerning this project or the EBT program, please contact Joseph Musa at joseph.musa@tceq.texas.gov or write to the TCEQ, Office of Air, Air Permits Division, MC-163, P.O. Box 13087, Austin, Texas 78711-3087.

This action is taken under authority delegated by the executive director of the TCEQ.

Sincerely,

A handwritten signature in black ink, appearing to read "Samuel Short", followed by a horizontal line.

Samuel Short, Deputy Director
Air Permits Division

cc: Jodie Vice, Environmental Health Director, Brazoria County Health Department

Table 1. Compliance Account Summary.

2020 Control Period	Amount (tons)
Certified Allocation	2466.6
Allowances for Offsets	49.1
Previous Year Deficit with 10% Penalty	0.0
Total Current Allowances Traded In	50.8
Total Current Allowances Traded Out	2468.3
Vintage Allowances from Previous Year	0.0
Vintage Allowances Traded In	1892.0
Vintage Allowances Traded Out	0.0
Total Reported Emissions	1342.7
Quantification Penalty	0.0
Current Allowances Used for Compliance	49.1
Vintage Allowances Used for Compliance	1293.6
Deficit	0.0
Vintage Allowances Expired	598.4
Current Allowances Remaining	0.0

2020 MECT Annual Compliance Report Technical Review

Project Number:	416254	Project Manager:	Joseph Musa
Customer Reference No.:	CN600356976	Company Name:	The Dow Chemical Company
Regulated Entity Reference No.:	RN100225945	Site Name:	Dow Texas Operations Freeport
Portfolio Number:	P0182	County:	Brazoria

Summary

Review Level:	☐ Basic ☒ Audit
Source Type:	☒ Major ☐ Minor ☐ Electric Generation Utility
Quantification Penalty:	☐ Yes ☒ No
Potential Deviation:	☐ Yes ☒ No
Was the company notified about insufficient allowances, penalties, or changes to the report?	☒ Yes ☐ N/A

General Review

Review	Yes/No	Explanation
Was the report submitted on or before March 31?	Yes	Date Submitted: 03/31/2021
Was the report certified (submitted) by the portfolio's registered Primary or Alternate Authorized Account Representative (AAR)?	Yes	Certified by: Prentice James
Are the company and site information consistent with Central Registry?	Yes	
Were any new FINs reported or did any existing FINs undergo a change in status (e.g., shutdown, removed, etc.)?	Yes	See Appendix A.
Did the site's account for this control period have sufficient allowances to cover the emissions and any penalties assessed?	Yes	

Audit Emissions Review

Review	Yes/No	Explanation
Were appropriate protocol citations provided for the Level of Activity (LOA) and Emission Factor (EF) for each FIN?	Yes	

Review	Yes/No	Explanation
For units without CEMS/PEMS, were the LOA and EF for each FIN reported in the units of the applicable Chapter 117 emission specifications?	Yes	
Was the appropriate supporting documentation provided for each FIN? See the MECT Supporting Documentation Guidance.	Yes	
Have all relevant stack tests been reviewed to determine if the results are acceptable under 101.354(a)? Is the EF in the stack test the same value reported for this control period?	Yes	See Additional Notes section.
Were the emission quantification calculations correct? See Annual Reports SOP for instructions on reviewing a representative sample for each FIN type.	Yes	
Were emissions from one or more FINs determined using alternate data under §101.354(b)?	No	

Additional Notes

The stack test reports for the following facilities were reviewed in project number 412809 and were deemed to be acceptable under §101.354(a): A26VEB500, B27P3H503, B27P3H511, B27P3H521, B35EWS200, B35EWS201, B8MBTO180, B93P5H510, BSRSRH575, BSRSRHDHT2, BSRSRHET1, BSRSRHET2, BSRSRHSBH, OC3DOH61, and OC3DOH62. These facilities have not been re-tested since the reviews were completed.

Thermal oxidizer B34VMTO210 was tested on 04/14/2003 and re-tested on 11/13/2018. According to the company, the 2018 test was performed under “non-routine worst expected case NO_x emission conditions which are not conditions that would be considered normal or representative of normal operations or emissions for the FTO.” Further, the company stated that the 2003 performance test was representative of the current operating conditions. Based on discussion with the team leader, the emission factor of 0.0027 lb/MMBtu, determined from the 2003 test, was accepted for the 2020 control period. It should be noted that the 2003 stack test report was reviewed in project number 412809 and was determined to be acceptable under §101.354(a).

The EBT IMS database was updated to reflect that new furnaces OC2L9H120 and OC2L9H129 are equipped with CEMS. The company was notified of the change.

Appendix A: Summary of FIN Status Changes that Occurred Since the Previous Control Period

FIN	EPN	Status	Effective Date
OC2L9H120	OC2H120	New	05/04/2020
OC2L9H129	OC2H129	New	08/05/2020

06/30/2021 ----- EBTP IMS- PROJECT RECORD -----

PROJECT#: 416254 STATUS: C DISP CODE: _____
 RECEIVED: 03/31/2021 PROJTYPE: BRPT ISSUED DT: _____
 SUP-DISP DATE: 06/30/2021

STAFF ASSIGNED TO PROJECT:

MUSA, JOSEPH

PROJECT NOTES:

[.Attachments](#) from Steers
[.Copy Of Record](#) from Steers
 .AUDIT REVIEW

PROJECT TRANSACTIONS**COMPANY DATA**

COMPANY NAME: THE DOW CHEMICAL COMPANY
 CUSTOMER REGISTRY ID: CN600356976

PORTFOLIO DATA

NUMBER: P0182 NAME: DOW TEXAS OPERATIONS FREEPORT - RN100225945

SITE DATA

ACCOUNT: BL0082R
 REG ENTITY ID: RN100225945
 SITE NAME: DOW TEXAS OPERATIONS FREEPORT
 COUNTY: BRAZORIA NEAREST CITY: FREEPORT
 LOCATION: 2301 N BRAZOSPORT BLVD, STE B1226,
 FREEPORT (HWY 288)

CONTACT DATA

NAME: PRENTICE C.JAMES TITLE: Regional EH&S Manager
 ROLE: AAR
 STREET: 332 SH 332 E, APB2A1
 CITY/STATE, ZIP: LAKE JACKSON, TX , 77566-
 PHONE: 979-238-1443 -
 EMAIL: PCJAMES@DOW.COM

TRANSACTION DATA

TRANSACTION TYPE: CAP_RPT POLLUTANT : NOX
 EFFECTIVE YEAR: 2020 TON: 5.2

Allowance Type	Total
ACTUAL	1342.7

TRANSACTION TYPE: CAP_VINT POLLUTANT : NOX
 EFFECTIVE YEAR: 2020 TON: 0

TRACKING ACTIVITIES

PROJECT SUBMITTED : 03/31/2021 AUDIT REPORT : 03/31/2021 PROJECT RECEIVED BY PM : 04/01/2021
 TR - DEFICIENCY CYCLE : 04/20/2021 04/21/2021
 TR - DEFICIENCY CYCLE : 05/03/2021 05/05/2021 TEAM LEAD REVIEW : 05/28/2021
 TR - DEFICIENCY CYCLE : 06/11/2021 06/23/2021 SECTION MANAGER REVIEW : 06/28/2021

Portfolio Detail

Portfolio Number: P0182
Portfolio Name: DOW TEXAS OPERATIONS FREEPORT - RN100225945
Company Name: THE DOW CHEMICAL COMPANY

Actual Allowances for Pollutant NOX

Balance/Year	2018	2019	2020	2021	2022	2023	2024
Penalty from last year	<u>0</u>	<u>0</u>	<u>0</u>	<u>0</u>	<u>0</u>	<u>0</u>	<u>0</u>
Certified Allocation	<u>2466.6</u>	<u>2466.6</u>	<u>2466.6</u>	<u>2466.6</u>	<u>2466.6</u>	<u>2466.6</u>	<u>2466.6</u>
Allowances for Offsets	<u>-0</u>	<u>-0</u>	<u>-49.1</u>	<u>-49.1</u>	<u>-49.1</u>	<u>-49.1</u>	<u>-49.1</u>
Future Trade In	<u>0</u>	<u>0</u>	<u>0</u>	<u>0</u>	<u>0</u>	<u>0</u>	<u>0</u>
Future Trade Out	<u>-0</u>	<u>-0</u>	<u>-0</u>	<u>-0</u>	<u>-0</u>	<u>-0</u>	<u>-0</u>
Stream Traded In	<u>0</u>	<u>50.8</u>	<u>50.8</u>	<u>50.8</u>	<u>50.8</u>	<u>50.8</u>	<u>50.8</u>
Stream Traded Out	<u>-2466.6</u>	<u>-2468.3</u>	<u>-2468.3</u>	<u>-2468.3</u>	<u>-2468.3</u>	<u>-2468.3</u>	<u>-2468.3</u>
Current Traded In	<u>0</u>	<u>0</u>	<u>0</u>	<u>0</u>	<u>0</u>	<u>0</u>	<u>0</u>
Current Traded Out	<u>-0</u>	<u>-49.1</u>	<u>-0</u>	<u>-0</u>	<u>-0</u>	<u>-0</u>	<u>-0</u>
Total Reported Emissions	-1207.2	-1376.3	0	0	0	0	0
Quantification Penalty	-0	-0	-0	-0	-0	-0	-0
Current Used for Compliance	<u>-0</u>	<u>-0</u>	<u>-0</u>	<u>-0</u>	<u>-0</u>	<u>-0</u>	<u>-0</u>
Vintage From Previous Year	<u>0</u>	<u>0</u>	<u>0</u>	<u>0</u>	<u>0</u>	<u>0</u>	<u>0</u>
Vintage Traded In	<u>1527.6</u>	<u>2000</u>	<u>1892</u>	<u>0</u>	<u>0</u>	<u>0</u>	<u>0</u>
Vintage Traded Out	<u>-0</u>	<u>-0</u>	<u>-0</u>	<u>-0</u>	<u>-0</u>	<u>-0</u>	<u>-0</u>
Vintage Used for Compliance	<u>-1207.2</u>	<u>-1376.3</u>	<u>-0</u>	<u>-0</u>	<u>-0</u>	<u>-0</u>	<u>-0</u>
DERC Intent	300	300	300	0	0	0	0
DERC Use	0	0	0	0	0	0	0
ERC Converted to Allowances	0	0	0	0	0	0	0
CURRENT ALLOWANCE BALANCE	<u>0</u>	<u>0</u>	<u>0</u>	<u>0</u>	<u>0</u>	<u>0</u>	<u>0</u>
VINTAGE ALLOWANCE BALANCE	<u>320.4</u>	<u>623.7</u>	<u>1892</u>	<u>0</u>	<u>0</u>	<u>0</u>	<u>0</u>

Allowable Allowances

Balance/Year	2018	2019	2020	2021	2022	2023	2024
Starting Allowance for **	0	0	0	0	0	0	0
Deficit	0	0	0	0	0	0	0
Actual Emissions	-0	-0	-0	-0	-0	-0	-0
Quantification Penalty	0	0	0	0	0	0	0
BALANCE	0	0	0	0	0	0	0

Starting Allowance for **	0	0	0	0	0	0	0
Deficit	0	0	0	0	0	0	0
Actual Emissions	-0	-0	-0	-0	-0	-0	-0
Quantification Penalty	0	0	0	0	0	0	0
BALANCE	0	0	0	0	0	0	0

Starting Allowance for **	0	0	0	0	0	0	0
Deficit	0	0	0	0	0	0	0
Actual Emissions	-0	-0	-0	-0	-0	-0	-0
Quantification Penalty	0	0	0	0	0	0	0
BALANCE	0	0	0	0	0	0	0

Starting Allowance for **	0	0	0	0	0	0	0
Deficit	0	0	0	0	0	0	0
Actual Emissions	-0	-0	-0	-0	-0	-0	-0
Quantification Penalty	0	0	0	0	0	0	0
BALANCE	0	0	0	0	0	0	0

Starting Allowance for **	0	0	0	0	0	0	0
Deficit	0	0	0	0	0	0	0
Actual Emissions	-0	-0	-0	-0	-0	-0	-0
Quantification Penalty	0	0	0	0	0	0	0
BALANCE	0	0	0	0	0	0	0

Starting Allowance for **	0	0	0	0	0	0	0
Deficit	0	0	0	0	0	0	0
Actual Emissions	-0	-0	-0	-0	-0	-0	-0
Quantification Penalty	0	0	0	0	0	0	0
BALANCE	0	0	0	0	0	0	0

Starting Allowance for **	0	0	0	0	0	0	0
Deficit	0	0	0	0	0	0	0
Actual Emissions	-0	-0	-0	-0	-0	-0	-0
Quantification Penalty	0	0	0	0	0	0	0
BALANCE	0	0	0	0	0	0	0

Starting Allowance for **	0	0	0	0	0	0	0
Deficit	0	0	0	0	0	0	0
Actual Emissions	-0	-0	-0	-0	-0	-0	-0
Quantification Penalty	0	0	0	0	0	0	0
BALANCE	0	0	0	0	0	0	0

Starting Allowance for	0	0	0	0	0	0	0
Deficit	0	0	0	0	0	0	0
Actual Emissions							

	-0	-0	-0	-0	-0	-0	-0
Quantification Penalty	0	0	0	0	0	0	0
BALANCE	0	0	0	0	0	0	0
Starting Allowance for **	0	0	0	0	0	0	0
Deficit	0	0	0	0	0	0	0
Actual Emissions	-0	-0	-0	-0	-0	-0	-0
Quantification Penalty	0	0	0	0	0	0	0
BALANCE	0	0	0	0	0	0	0
Starting Allowance for **	0	0	0	0	0	0	0
Deficit	0	0	0	0	0	0	0
Actual Emissions	-0	-0	-0	-0	-0	-0	-0
Quantification Penalty	0	0	0	0	0	0	0
BALANCE	0	0	0	0	0	0	0
Starting Allowance for **	0	0	0	0	0	0	0
Deficit	0	0	0	0	0	0	0
Actual Emissions	-0	-0	-0	-0	-0	-0	-0
Quantification Penalty	0	0	0	0	0	0	0
BALANCE	0	0	0	0	0	0	0
Starting Allowance for **	0	0	0	0	0	0	0
Deficit	0	0	0	0	0	0	0
Actual Emissions	-0	-0	-0	-0	-0	-0	-0
Quantification Penalty	0	0	0	0	0	0	0
BALANCE	0	0	0	0	0	0	0
Starting Allowance for **	0	0	0	0	0	0	0
Deficit	0	0	0	0	0	0	0
Actual Emissions	-0	-0	-0	-0	-0	-0	-0
Quantification Penalty	0	0	0	0	0	0	0
BALANCE	0	0	0	0	0	0	0
Starting Allowance for **	0	0	0	0	0	0	0
Deficit	0	0	0	0	0	0	0
Actual Emissions	-0	-0	-0	-0	-0	-0	-0
Quantification Penalty	0	0	0	0	0	0	0
BALANCE	0	0	0	0	0	0	0
Starting Allowance for **	0	0	0	0	0	0	0
Deficit	0	0	0	0	0	0	0
Actual Emissions	-0	-0	-0	-0	-0	-0	-0
Quantification Penalty	0	0	0	0	0	0	0
BALANCE	0	0	0	0	0	0	0

	0	0	0	0	0	0	0
Starting Allowance for **	0	0	0	0	0	0	0
Deficit	0	0	0	0	0	0	0
Actual Emissions	-0	-0	-0	-0	-0	-0	-0
Quantification Penalty	0	0	0	0	0	0	0
BALANCE	0	0	0	0	0	0	0
Starting Allowance for **	0	0	0	0	0	0	0
Deficit	0	0	0	0	0	0	0
Actual Emissions	-0	-0	-0	-0	-0	-0	-0
Quantification Penalty	0	0	0	0	0	0	0
BALANCE	0	0	0	0	0	0	0
Starting Allowance for **	0	0	0	0	0	0	0
Deficit	0	0	0	0	0	0	0
Actual Emissions	-0	-0	-0	-0	-0	-0	-0
Quantification Penalty	0	0	0	0	0	0	0
BALANCE	0	0	0	0	0	0	0
Starting Allowance for **	0	0	0	0	0	0	0
Deficit	0	0	0	0	0	0	0
Actual Emissions	-0	-0	-0	-0	-0	-0	-0
Quantification Penalty	0	0	0	0	0	0	0
BALANCE	0	0	0	0	0	0	0
Starting Allowance for	0	0	0	0	0	0	0
Deficit	0	0	0	0	0	0	0
Actual Emissions	-0	-0	-0	-0	-0	-0	-0
Quantification Penalty	0	0	0	0	0	0	0
BALANCE	0	0	0	0	0	0	0
Starting Allowance for **	0	0	0	0	0	0	0
Deficit	0	0	0	0	0	0	0
Actual Emissions	-0	-0	-0	-0	-0	-0	-0
Quantification Penalty	0	0	0	0	0	0	0
BALANCE	0	0	0	0	0	0	0

** This fin was recertified.

Flexible Allowances for Pollutant NOX

Balance	2018	2019	2020	2021	2022	2023	2024
Flexible Allowance	0	0	0	0	0	0	0
Penalty	0	0	0	0	0	0	0

Associated Annual Emissions**BALANCE**

-0	-0	-0	-0	-0	-0	-0
0	0	0	0	0	0	0

Sb7 Allowances for Pollutant NOX

Balance/Year	2018	2019	2020	2021	2022	2023	2024
Previous Year Deficit	<u>0</u>	<u>0</u>	<u>0</u>	<u>0</u>	<u>0</u>	<u>0</u>	<u>0</u>
Allowances Remaining from Previous Year	<u>0</u>	<u>0</u>	<u>0</u>	<u>0</u>	<u>0</u>	<u>0</u>	<u>0</u>
Allocation	<u>0</u>	<u>0</u>	<u>0</u>	<u>0</u>	<u>0</u>	<u>0</u>	<u>0</u>
Current Traded In	<u>0</u>	<u>0</u>	<u>0</u>	<u>0</u>	<u>0</u>	<u>0</u>	<u>0</u>
Current Traded Out	<u>-0</u>	<u>-0</u>	<u>-0</u>	<u>-0</u>	<u>-0</u>	<u>-0</u>	<u>-0</u>
Stream Traded In	<u>0</u>	<u>0</u>	<u>0</u>	<u>0</u>	<u>0</u>	<u>0</u>	<u>0</u>
Stream Traded Out	<u>-0</u>	<u>-0</u>	<u>-0</u>	<u>-0</u>	<u>-0</u>	<u>-0</u>	<u>-0</u>
Total Reported Emissions	-0	-0	-0	-0	-0	-0	-0
Remaining Balance	<u>0</u>	<u>0</u>	<u>0</u>	<u>0</u>	<u>0</u>	<u>0</u>	<u>0</u>

DERC >

Certificate Num	Cont Code	Avail Tons	Transaction Type	Inactive Date	Gen Start Date	Gen End Date	County	Parent Cert Num
1150-1674	NOX	525.00	DERC_GEN	01/26/2000	12/30/3000		BRAZORIA	
D1003	NOX	7841.00	DERC_RET	11/15/2004	11/01/1994	12/31/1997	BRAZORIA	
D1023	NOX	2375.40	DERC_SELL	08/25/2010	01/01/2001	12/31/2001	BRAZORIA	0
D2546	NOX	2000.00	DERC_SELL	09/03/2010	01/01/2001	12/31/2001	BRAZORIA	D1023
D2734	NOX	433.90	DERC_RET	08/30/2011	01/01/2000	12/31/2000	BRAZORIA	D2568
D1148	NOX	126.60	DERC_SELL	01/14/2010	03/20/1999	11/15/1999	BRAZORIA	0
D1149	NOX	20.10	DERC_GEN	01/14/2010	10/22/1999	11/15/1999	BRAZORIA	
D2452	NOX	13.10	DERC_RET	02/04/2010	10/22/1999	11/15/1999	BRAZORIA	D1149
D2457	NOX	26.60	DERC_SELL	11/18/2010	03/20/1999	11/15/1999	BRAZORIA	D1148
D2477	NOX	3.10	DERC_RET	11/18/2010	10/22/1999	11/15/1999	BRAZORIA	D2452
D2568	NOX	436.90	DERC_RET	02/01/2011	01/01/2000	12/31/2000	BRAZORIA	D2555
D2671	NOX	25.60	DERC_SELL	12/08/2010	03/20/1999	11/15/1999	BRAZORIA	D2457
D2768	NOX	1299.10	DERC_RET	12/30/3000	01/01/2000	12/31/2000	BRAZORIA	D2555
D2780	NOX	359.90	DERC_RET	08/13/2015	01/01/2000	12/31/2000	BRAZORIA	D2734
D2780	NOX	359.90	DERC_SELL	08/13/2015	01/01/2000	12/31/2000	BRAZORIA	D2734
D3188	NOX	300.00	DERC_RET	08/28/2020	01/01/2000	12/31/2000	BRAZORIA	D2780
10132-1149	NOX	1018.00	DERC_SELL	09/26/2001	12/30/3000	12/31/1997	BRAZORIA	10132-1149
D1007	NOX	477.00	DERC_RET	08/25/2010	01/01/1994	12/31/1994	BRAZORIA	0
D1012	NOX	3414.00	DERC_RET	09/09/2010	01/01/1998	12/31/1998	BRAZORIA	D1012
D2568	NOX	436.90	DERC_SELL	02/01/2011	01/01/2000	12/31/2000	BRAZORIA	D2555
D2673	NOX	0.10	DERC_RET	09/09/2010	10/22/1999	11/15/1999	BRAZORIA	D2477
00091-9931	NOX	9841.00	DERC_GEN	01/26/2000	12/30/3000	12/31/1997	BRAZORIA	00091-9931

10132-1149	NOX	1018.00	DERC_GEN	09/26/2001	12/30/3000	12/31/1997	BRAZORIA	10132-1149
D1003	NOX	7841.00	DERC_SELL	11/15/2004	11/01/1994	12/31/1997	BRAZORIA	
D1006	NOX	218.00	DERC_SELL	09/08/2009	11/01/1994	12/31/1997	BRAZORIA	D1006
D2273	NOX	5541.00	DERC_RET	02/13/2009	11/01/1994	12/31/1997	BRAZORIA	D2271
D2452	NOX	13.10	DERC_SELL	02/04/2010	10/22/1999	11/15/1999	BRAZORIA	D1149
D2477	NOX	3.10	DERC_SELL	11/18/2010	10/22/1999	11/15/1999	BRAZORIA	D2452
D2768	NOX	1299.10	DERC_INTEN	12/30/3000	01/01/2000	12/31/2000	BRAZORIA	D2555
D3188	NOX	300.00	DERC_INTEN	08/28/2020	01/01/2000	12/31/2000	BRAZORIA	D2780
D3444	NOX	268.80	DERC_RET	12/30/3000	01/01/2000	12/31/2000	BRAZORIA	D3188
11150-1674	NOX	525.00	DERC_GEN	01/26/2000	12/30/3000	12/31/1997	BRAZORIA	
D1022	NOX	2044.00	DERC_RET	09/03/2010	01/01/2000	12/31/2000	BRAZORIA	0
D2273	NOX	5541.00	DERC_SELL	02/13/2009	11/01/1994	12/31/1997	BRAZORIA	D2271
D2415	NOX	213.00	DERC_RET	09/09/2010	11/01/1994	12/31/1997	BRAZORIA	D1006
D2551	NOX	1700.90	DERC_RET	12/30/3000	01/01/2001	12/31/2001	BRAZORIA	D2546
0091-7931	NOX	7841.00	DERC_RET	01/26/2000	12/31/1997		BRAZORIA	0091-7931
D1023	NOX	2375.40	DERC_RET	08/25/2010	01/01/2001	12/31/2001	BRAZORIA	0
D1149	NOX	20.10	DERC_SELL	01/14/2010	10/22/1999	11/15/1999	BRAZORIA	
D1187	NOX	7831.00	DERC_SELL	01/31/2007	11/01/1994	12/31/1997	BRAZORIA	D1003
D2166	NOX	7581.00	DERC_SELL	11/18/2009	11/01/1994	12/31/1997	BRAZORIA	D1187
D2190	NOX	7541.00	DERC_SELL	02/13/2009	11/01/1994	12/31/1997	BRAZORIA	D2166
D2457	NOX	26.60	DERC_RET	11/18/2010	03/20/1999	11/15/1999	BRAZORIA	D1148
D2671	NOX	25.60	DERC_RET	12/08/2010	03/20/1999	11/15/1999	BRAZORIA	D2457
91-10131	NOX	10041.00	DERC_GEN	01/26/2000	12/30/3000	12/31/1997	BRAZORIA	
D1007	NOX	477.00	DERC_SELL	08/25/2010	01/01/1994	12/31/1994	BRAZORIA	0
D1148	NOX	126.60	DERC_GEN	01/14/2010	03/20/1999	11/15/1999	BRAZORIA	0
D1187	NOX	7831.00	DERC_RET	01/31/2007	11/01/1994	12/31/1997	BRAZORIA	D1003
D2271	NOX	6541.00	DERC_RET	02/17/2009	11/01/1994	12/31/1997	BRAZORIA	D2190
D2275	NOX	4541.00	DERC_RET	09/09/2010	11/01/1994	12/31/1997	BRAZORIA	D2273
D2555	NOX	1736.00	DERC_INTEN	05/17/2011	01/01/2000	12/31/2000	BRAZORIA	D1022
D3491	NOX	31.20	DERC_USE	08/28/2020	01/01/2000	12/31/2000	BRAZORIA	D3188
10932-1149	NOX	218.00	DERC_RET	01/26/2000	12/31/1997		BRAZORIA	
1150-1626	NOX	477.00	DERC_RET	01/26/2000	12/31/1994		BRAZORIA	
D1006	NOX	218.00	DERC_RET	09/08/2009	11/01/1994	12/31/1997	BRAZORIA	D1006
D1021	NOX	2965.00	DERC_RET	09/09/2010	01/01/1999	11/15/1999	BRAZORIA	D1021
D1022	NOX	2044.00	DERC_SELL	09/03/2010	01/01/2000	12/31/2000	BRAZORIA	0
D2166	NOX	7581.00	DERC_RET	11/18/2009	11/01/1994	12/31/1997	BRAZORIA	D1187
D2190	NOX	7541.00	DERC_RET	02/13/2009	11/01/1994	12/31/1997	BRAZORIA	D2166
D2271	NOX	6541.00	DERC_SELL	02/17/2009	11/01/1994	12/31/1997	BRAZORIA	D2190
D2546	NOX	2000.00	DERC_RET	09/03/2010	01/01/2001	12/31/2001	BRAZORIA	D1023
D2551	NOX	1700.90	DERC_INTEN	12/30/3000	01/01/2001	12/31/2001	BRAZORIA	D2546

D2555	NOX	1736.00	DERC_RET	05/17/2011	01/01/2000	12/31/2000	BRAZORIA	D1022
D2734	NOX	433.90	DERC_SELL	08/30/2011	01/01/2000	12/31/2000	BRAZORIA	D2568

ERC

Certificate Num	Cont Code	Avail Tons	Transaction Type	Active/Inactive	Gen Date	Exp Date	County	Parent Cert Num
3405	NOX	1.90	ERC_INTEN	03/06/2019	04/02/2014	04/02/2019	GALVESTON	2889
3342	NOX	3.80	ERC_BUY	12/11/2018	10/03/2013	10/03/2018	GALVESTON	2874
3405	NOX	1.90	ERC_USE	03/06/2019	04/02/2014	04/02/2019	GALVESTON	2889
3342	NOX	3.80	ERC_INTEN	12/11/2018	10/03/2013	10/03/2018	GALVESTON	2874
3342	NOX	3.80	ERC_USE	12/11/2018	10/03/2013	10/03/2018	GALVESTON	2874
3405	NOX	1.90	ERC_BUY	03/06/2019	04/02/2014	04/02/2019	GALVESTON	2889

Banking Cap and Trade
Portfolio Balance for P182

Actual Allowances for NOX

Balance/Year	2018	2019	2020	2021	2022	2023	2024
Current Balance	0	0	0	0	0	0	0

Vintage Balances for NOX

Balance/Year	2018	2019	2020	2021	2022	2023	2024
Current Balance	320.40	623.70	598.40	0	0	0	0

Allowances for Offsets NOX

Balance/Year	2019	2020	2021	2022	2023	2024
Current Balance	0	0	49.10	49.10	49.10	49.10

Flex permits Allowances for NOX

Balance/Year	2018	2019	2020	2021	2022	2023	2024
Current Balance	0	0	0	0	0	0	0

Pending Projects		
Proj_num	Xaction Type	
416284	DERC_USE	

Pseudocally Closed Projects		
Proj_num	Xaction Type	
416254	CAP_RPT	
416254	CAP_VINT	

Confirm Records to Send to TCEQ

Portfolio Number:P0182
Data current as of:03/31/2021

Portfolio Information

Portfolio Number: P0182
Portfolio Name: DOW TEXAS OPERATIONS FREEPORT - RN100225945
Program: MECT
Project Number: 416254
Pollutant Code: NOX
Control Period: 2020

FIN:A26VEB500	Fin Name:WASTE GAS BOILER WGB-500 INCI-2665			EPN:A26S500	CEMS/PEMS:No
LOA	LOA Citation	LOA Units	EF Citation	EF Units	Tons Reported
330615.000000	117.340(a)(1)(B)	MMBTU	117.340(o)	LB/MMBTU	30.42
FIN:A36S621	Fin Name:F-621 FURNACE/SCR VENT-2761			EPN:	CEMS/PEMS:Yes
LOA	LOA Citation	LOA Units	EF Citation	EF Units	Tons Reported
1010375.000000	117.340(a)(1)(B)	MMBTU	117.340(c),(f)		5.37
FIN:B27P3H503	Fin Name:FURNACE DTY-503-2697			EPN:B27S503	CEMS/PEMS:No
LOA	LOA Citation	LOA Units	EF Citation	EF Units	Tons Reported
156128.000000	117.340(a)(1)(B)	MMBTU	117.340(o)	LB/MMBTU	2.19
FIN:B27P3H511	Fin Name:FURNACE DTY-511-2699			EPN:B27S511	CEMS/PEMS:No
LOA	LOA Citation	LOA Units	EF Citation	EF Units	Tons Reported
220840.000000	117.340(a)(1)(B)	MMBTU	117.340(o)	LB/MMBTU	9.39
FIN:B27P3H521	Fin Name:FURNACE DTY-533-2700			EPN:B27S521	CEMS/PEMS:No
LOA	LOA Citation	LOA Units	EF Citation	EF Units	Tons Reported
69961.000000	117.340(a)(1)(B)	MMBTU	117.340(o)	LB/MMBTU	1.57
FIN:B27P3H523	Fin Name:FURNACE DTY-523-2698			EPN:B27S523	CEMS/PEMS:No
LOA	LOA Citation	LOA Units	EF Citation	EF Units	Tons Reported
158080.000000	117.340(a)(1)(B)	MMBTU	117.340(o)	LB/MMBTU	3.71
FIN:B33JNS1	Fin Name:TEXAS KILN-2691			EPN:	CEMS/PEMS:Yes
LOA	LOA Citation	LOA Units	EF Citation	EF Units	Tons Reported
10551.000000	117.340(a)(2)(A)	MMSCF	117.340(c),(f)		48.26
FIN:B34VMT0210	Fin Name:FTO-3891			EPN:B34S1400	CEMS/PEMS:No
LOA	LOA Citation	LOA Units	EF Citation	EF Units	Tons Reported
592447.000000	117.340(a)(1)(B)	MMBTU	117.340(o)	LB/MMBTU	0.80
FIN:B35EWS200	Fin Name:CG-200 THROX INCINERATOR-2689			EPN:B35EWS200	CEMS/PEMS:No
LOA	LOA Citation	LOA Units	EF Citation	EF Units	Tons Reported
238145.000000	117.340(a)(1)(B)	MMBTU	117.340(o)	LB/MMBTU	6.43
FIN:B35EWS201	Fin Name:IN-201 BACKUP TOX INCINERATOR-2690			EPN:B35EWS201	CEMS/PEMS:No
LOA	LOA Citation	LOA Units	EF Citation	EF Units	Tons Reported
15032.000000	117.340(a)(1)(B)	MMBTU	117.340(o)	LB/MMBTU	0.50
FIN:B41P4TO365	Fin Name:POLY 4 BACK UP TOX 365-12202			EPN:	CEMS/PEMS:No
LOA	LOA Citation	LOA Units	EF Citation	EF Units	Tons Reported
14622.000000	117.340(a)(1)(B)	MMBTU	117.340(o)	LB/MMBTU	0.20
FIN:B56CR96	Fin Name:GT 96			EPN:	CEMS/PEMS:Yes
LOA	LOA Citation	LOA Units	EF Citation	EF Units	Tons Reported
12124686.000000	117.340(a)(1)(B)	MMBTU	117.340(c),(f)		62.23
FIN:B56SB1	Fin Name:BOILER 91-2767			EPN:	CEMS/PEMS:Yes
LOA	LOA Citation	LOA Units	EF Citation	EF Units	Tons Reported
1153737.000000	117.340(a)(1)(B)	MMBTU	117.340(c),(f)		3.84
FIN:B56SB2	Fin Name:BOILER 92-2768			EPN:	CEMS/PEMS:Yes
LOA	LOA Citation	LOA Units	EF Citation	EF Units	Tons Reported
1424755.000000	117.340(a)(1)(B)	MMBTU	117.340(c),(f)		4.46
FIN:B56SB3	Fin Name:BOILER 93-2769			EPN:	CEMS/PEMS:Yes
LOA	LOA Citation	LOA Units	EF Citation	EF Units	Tons Reported
1269036.000000	117.340(a)(1)(B)	MMBTU	117.340(c),(f)		4.09
FIN:B56SB4	Fin Name:BOILER 94-2770			EPN:	CEMS/PEMS:Yes
LOA	LOA Citation	LOA Units	EF Citation	EF Units	Tons Reported
1167685.000000	117.340(a)(1)(B)	MMBTU	117.340(c),(f)		3.56
FIN:B72L7HH1	Fin Name:FURNACE H-1-6898			EPN:	CEMS/PEMS:Yes
LOA	LOA Citation	LOA Units	EF Citation	EF Units	Tons Reported
2788725.000000	117.340(a)(1)(B)	MMBTU	117.340(c),(f)		56.51
FIN:B72L7HH2	Fin Name:FURNACE H-2-7025			EPN:	CEMS/PEMS:Yes
LOA	LOA Citation	LOA Units	EF Citation	EF Units	Tons Reported
2751922.000000	117.340(a)(1)(B)	MMBTU	117.340(c),(f)		49.35
FIN:B72L7HH3	Fin Name:FURNACE H-3-7026			EPN:	CEMS/PEMS:Yes
LOA	LOA Citation	LOA Units	EF Citation	EF Units	Tons Reported
2668220.000000	117.340(a)(1)(B)	MMBTU	117.340(c),(f)		57.27
FIN:B72L7HH4	Fin Name:FURNACE H-4-7027			EPN:	CEMS/PEMS:Yes
LOA	LOA Citation	LOA Units	EF Citation	EF Units	Tons Reported
2935731.000000	117.340(a)(1)(B)	MMBTU	117.340(c),(f)		56.94
FIN:B72L7HH5	Fin Name:FURNACE H-5-7028			EPN:	CEMS/PEMS:Yes
LOA	LOA Citation	LOA Units	EF Citation	EF Units	Tons Reported
2585001.000000	117.340(a)(1)(B)	MMBTU	117.340(c),(f)		51.66
FIN:B8MBTO180	Fin Name:B-824 TOX-2664			EPN:B8S180	CEMS/PEMS:No
LOA	LOA Citation	LOA Units	EF Citation	EF Units	Tons Reported
396275.000000	117.340(a)(1)(B)	MMBTU	117.340(o)	LB/MMBTU	5.15
FIN:B93P5H510	Fin Name:POLY 5 DOWTHERM FURNACE F-5510-11152			EPN:	CEMS/PEMS:No
LOA	LOA Citation	LOA Units	EF Citation	EF Units	Tons Reported
478519.000000	117.340(a)(1)(B)	MMBTU	117.340(o)	LB/MMBTU	8.37
FIN:B93P6H6510	Fin Name:POLY 6 DOWTHERM FURNACE F-6510-12098			EPN:	CEMS/PEMS:No
LOA	LOA Citation	LOA Units	EF Citation	EF Units	Tons Reported
413193.000000	117.340(a)(1)(B)	MMBTU	117.340(o)	LB/MMSCF	4.55
FIN:BSRSRGE14	Fin Name:C14 GAS ENGINE-2704			EPN:BSRGE14	CEMS/PEMS:No
LOA	LOA Citation	LOA Units	EF Citation	EF Units	Tons Reported
1048500.000000	117.340(a)(1)(B)	HP-HR	117.340(o)	G/HP-HR	0.07
FIN:BSRSRH575	Fin Name:DOWTHERM HEATER H-575-11178			EPN:	CEMS/PEMS:No

LOA	LOA Citation	LOA Units	EF Citation	EF	EF Units	Tons Reported
3062.000000	117.340(a)(1)(B)	MMBTU	117.340(o)	0.017000	LB/MMBTU	0.03
FIN:BSRSRDH2 Fin Name:SALT DOME OPERATION - DOWNTHERM #2-8897						
LOA	LOA Citation	LOA Units	EF Citation	EF	EF Units	Tons Reported
1176.000000	117.340(a)(1)(B)	MMBTU	117.340(o)	0.064000	LB/MMBTU	0.04
FIN:BSRSRHET1 Fin Name:SALT DOME OPERATION NORTH ETH-2693						
LOA	LOA Citation	LOA Units	EF Citation	EF	EF Units	Tons Reported
39844.000000	117.340(a)(1)(B)	MMBTU	117.340(o)	0.065000	LB/MMBTU	1.29
FIN:BSRSRHET2 Fin Name:SALT DOME OPERATION SOUTH ETH-2695						
LOA	LOA Citation	LOA Units	EF Citation	EF	EF Units	Tons Reported
29486.000000	117.340(a)(1)(B)	MMBTU	117.340(o)	0.073000	LB/MMBTU	1.08
FIN:BSRSRHSBH Fin Name:SALT DOME OPERATION SALT BATH-2694						
LOA	LOA Citation	LOA Units	EF Citation	EF	EF Units	Tons Reported
3281.000000	117.340(a)(1)(B)	MMBTU	117.340(o)	0.086000	LB/MMBTU	0.14
FIN:OC2L9H120 Fin Name:HEATER H-120-12096						
LOA	LOA Citation	LOA Units	EF Citation	EF	EF Units	Tons Reported
2749074.000000	117.340(a)(1)(B)	MMBTU	117.340(c),(f)	0.007770	LB/MMBTU	10.68
FIN:OC2L9H121 Fin Name:FURNACE H-121-11153						
LOA	LOA Citation	LOA Units	EF Citation	EF	EF Units	Tons Reported
3977976.000000	117.340(a)(1)(B)	MMBTU	117.340(c),(f)			16.56
FIN:OC2L9H122 Fin Name:FURNACE H-122-11154						
LOA	LOA Citation	LOA Units	EF Citation	EF	EF Units	Tons Reported
4050949.000000	117.340(a)(1)(B)	MMBTU	117.340(c),(f)			15.60
FIN:OC2L9H123 Fin Name:FURNACE H-123-11155						
LOA	LOA Citation	LOA Units	EF Citation	EF	EF Units	Tons Reported
3958847.000000	117.340(a)(1)(B)	MMBTU	117.340(c),(f)			16.63
FIN:OC2L9H124 Fin Name:FURNACE H-124-11156						
LOA	LOA Citation	LOA Units	EF Citation	EF	EF Units	Tons Reported
3867206.000000	117.340(a)(1)(B)	MMBTU	117.340(c),(f)			15.53
FIN:OC2L9H125 Fin Name:FURNACE H-125-11157						
LOA	LOA Citation	LOA Units	EF Citation	EF	EF Units	Tons Reported
3921355.000000	117.340(a)(1)(B)	MMBTU	117.340(c),(f)			15.95
FIN:OC2L9H126 Fin Name:FURNACE H-126-11158						
LOA	LOA Citation	LOA Units	EF Citation	EF	EF Units	Tons Reported
3895340.000000	117.340(a)(1)(B)	MMBTU	117.340(c),(f)			16.37
FIN:OC2L9H127 Fin Name:FURNACE H-127-11159						
LOA	LOA Citation	LOA Units	EF Citation	EF	EF Units	Tons Reported
3900792.000000	117.340(a)(1)(B)	MMBTU	117.340(c),(f)			16.05
FIN:OC2L9H128 Fin Name:FURNACE H-128-11160						
LOA	LOA Citation	LOA Units	EF Citation	EF	EF Units	Tons Reported
3903552.000000	117.340(a)(1)(B)	MMBTU	117.340(c),(f)			16.10
FIN:OC2L9H129 Fin Name:HEATER H-129-12097						
LOA	LOA Citation	LOA Units	EF Citation	EF	EF Units	Tons Reported
1630767.000000	117.340(a)(1)(B)	MMBTU	117.340(c),(f)	0.007844	LB/MMBTU	6.40
FIN:OC3DOH61 Fin Name:FURNACE F-61-2666						
LOA	LOA Citation	LOA Units	EF Citation	EF	EF Units	Tons Reported
57750.000000	117.340(a)(1)(B)	MMBTU	117.340(o)	0.034000	LB/MMBTU	0.98
FIN:OC3DOH62 Fin Name:FURNACE F-62-2667						
LOA	LOA Citation	LOA Units	EF Citation	EF	EF Units	Tons Reported
59910.000000	117.340(a)(1)(B)	MMBTU	117.340(o)	0.032000	LB/MMBTU	0.96
FIN:OC4PHH310 Fin Name:PDH-1 HEATER H-310-10156						
LOA	LOA Citation	LOA Units	EF Citation	EF	EF Units	Tons Reported
1146764.000000	117.340(a)(1)(B)	MMBTU	117.340(c),(f)			10.72
FIN:OC4PHH320 Fin Name:PDH-1 HEATER H-320-10157						
LOA	LOA Citation	LOA Units	EF Citation	EF	EF Units	Tons Reported
1212781.000000	117.340(a)(1)(B)	MMBTU	117.340(c),(f)			11.38
FIN:OC4PHH330 Fin Name:PDH-1 HEATER H-330-10158						
LOA	LOA Citation	LOA Units	EF Citation	EF	EF Units	Tons Reported
753979.000000	117.340(a)(1)(B)	MMBTU	117.340(c),(f)			6.99
FIN:OC4PHH340 Fin Name:PDH-1 HEATER H-340-10159						
LOA	LOA Citation	LOA Units	EF Citation	EF	EF Units	Tons Reported
442467.000000	117.340(a)(1)(B)	MMBTU	117.340(c),(f)			6.27
FIN:OC6L8H1 Fin Name:PYROLYSIS FURNACE 1-2784						
LOA	LOA Citation	LOA Units	EF Citation	EF	EF Units	Tons Reported
1773130.000000	117.340(a)(1)(B)	MMBTU	117.340(c),(f)			68.46
FIN:OC6L8H10 Fin Name:PYROLYSIS FURNACE 10-2793						
LOA	LOA Citation	LOA Units	EF Citation	EF	EF Units	Tons Reported
2446088.000000	117.340(a)(1)(B)	MMBTU	117.340(c),(f)			65.67
FIN:OC6L8H2 Fin Name:PYROLYSIS FURNACE 2-2785						
LOA	LOA Citation	LOA Units	EF Citation	EF	EF Units	Tons Reported
1877650.000000	117.340(a)(1)(B)	MMBTU	117.340(c),(f)			80.53
FIN:OC6L8H3 Fin Name:PYROLYSIS FURNACE 3-2786						
LOA	LOA Citation	LOA Units	EF Citation	EF	EF Units	Tons Reported
2139428.000000	117.340(a)(1)(B)	MMBTU	117.340(c),(f)			92.76
FIN:OC6L8H4 Fin Name:PYROLYSIS FURNACE 4-2787						
LOA	LOA Citation	LOA Units	EF Citation	EF	EF Units	Tons Reported
1789780.000000	117.340(a)(1)(B)	MMBTU	117.340(c),(f)			76.91
FIN:OC6L8H5 Fin Name:PYROLYSIS FURNACE 5-2788						
LOA	LOA Citation	LOA Units	EF Citation	EF	EF Units	Tons Reported
2053083.000000	117.340(a)(1)(B)	MMBTU	117.340(c),(f)			98.77
FIN:OC6L8H6 Fin Name:PYROLYSIS FURNACE 6-2789						
LOA	LOA Citation	LOA Units	EF Citation	EF	EF Units	Tons Reported
1680456.000000	117.340(a)(1)(B)	MMBTU	117.340(c),(f)			67.46
FIN:OC6L8H7 Fin Name:PYROLYSIS FURNACE 7-2790						
LOA	LOA Citation	LOA Units	EF Citation	EF	EF Units	Tons Reported
1821907.000000	117.340(a)(1)(B)	MMBTU	117.340(c),(f)			62.65
FIN:OC6L8H8 Fin Name:PYROLYSIS FURNACE 8-2791						
LOA	LOA Citation	LOA Units	EF Citation	EF	EF Units	Tons Reported
2434882.000000	117.340(a)(1)(B)	MMBTU	117.340(c),(f)			66.20
FIN:OC6L8H9 Fin Name:PYROLYSIS FURNACE 9-2792						

LOA	LOA Citation	LOA Units	EF Citation	EF	EF Units	Tons Reported		
9628.000000	117.340(a)(1)(B)	MMBTU	117.340(c),(f)			0.62		
							Total Tons	1342.7

Contact Information

Primary Contact Name:

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Phone:

Email:

Technical Contact Name:

Phone:

Email:

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I certify that I have not violated any term in my TCEQ STEERS participation agreement and have no reason to believe that the confidentiality or use of my password has been compromised at any time. I understand that entering my password and pressing the "Confirm Submit" button constitutes an electronic signature legally equivalent to my written signature.

I certify that I am authorized to make this submission on behalf of the owners and operators of the site and facilities included in this submission. I certify that I have knowledge of the information in this submission and any attachments, and that, based on my knowledge and belief formed after reasonable inquiry, the information is true, accurate, and complete. I acknowledge that I have read and understand Texas Water Code (TWC) §§7.177-7.183, which define criminal offenses for certain violations, including intentionally or knowingly making or causing to be made false material statements or representations in this application, and TWC §7.187, pertaining to criminal penalties. Additionally, I understand that TWC §5.102 and Texas Health and Safety Code §382.002 authorize the TCEQ to carry out and enforce its rules and associated duties, including the duty to take enforcement actions if these rules are violated.

This document was signed by Prentice C James.
Signature Hash: D0A48E5011818C05A2078D8B6192B0894C288AC2C9EFFBC55EA74AAC4FCC9797

The following is additional information contained in your Copy of Record:
Submission IP address: 204.136.203.143
Submission date and time: 03/31/2021
Submission STEERS Version: 6.41
Submission Confirmation Number: 11997
Submission Data Hash Code: 36C481DD6DFC8B21C81ADDE371EB2E3935CF6E9A67163CF83865C344A21C3BD9

Central Registry Query - Regulated Entity Information

Regulated Entity Information

RN Number: RN100225945**Name:** DOW TEXAS OPERATIONS FREEPORT [View Prior Names ...](#)**Primary Business:** INDUSTRIAL CHEMICAL MANUFACTURING PLANT**Street Address:** 101 2301 N BRAZOSPORT BLVD, FREEPORT TX 77541**County:** BRAZORIA**Nearest City:** FREEPORT**State:** TX**Near ZIP Code:** 77541**Physical Location:** No physical location description ON file.

Affiliated Customers - Current

Your Search Returned **4** Current Affiliation Records ([View Affiliation History ...](#))

The Customer Name displayed may be different than the Customer Name associated to the Additional IDs related to the customer. This name may be different due to ownership changes, legal name changes, or other administrative changes.

1-4 of 4 Records

CN Number ▲	Customer Name	Customer Role(s)	Details
CN600356976	THE DOW CHEMICAL COMPANY	OWNER OPERATOR, RESPONSIBLE PARTY	
CN601287600	CORTEVA AGRISCIENCE LLC	OWNER OPERATOR	
CN604930784	BLUE CUBE OPERATIONS LLC	OWNER OPERATOR	
CN605483213	SK PRIMACOR AMERICAS LLC	OWNER	

Industry Type Codes

Code	Classification	Name
315110	NAICS	HOSIERY AND SOCK MILLS
325110	NAICS	Petrochemical Manufacturing
325181	NAICS	Alkalies and Chlorine Manufacturing
32519	NAICS	Other Basic Organic Chemical Manufacturing
325199	NAICS	All Other Basic Organic Chemical Manufacturing
325211	NAICS	Plastics Material and Resin Manufacturing
325320	NAICS	Pesticide and Other Agricultural Chemical Manufacturing
325998	NAICS	All Other Miscellaneous Chemical Product Manufacturing
1479	SIC	Chemical and Fertilizer Mineral Mining
1521	SIC	General Contractors-Single-Family Houses
1629	SIC	Heavy Construction



**Form ECT-1 Support Documentation
Annual Compliance Report
(Title 30 Texas Administrative Code § 101.359)**

FIN <u>B33INS1</u>	2020 Annual Stack Exhaust Flow Information	
		units
Stack Exhaust Flow	10,551,133	mscf

FIN <u>B35EWS200</u>	2020 Annual Fuel Information			Emission Factor
	mscf	btu/scf (HHV)	basis for HHV value	lb-NOx/mmbtu
Natural Gas Stream #1	90,141	1,020	site/supplier data	0.054
Natural Gas Stream #2	84,031	1,020	site/supplier data	
Vent Gas Stream #3	3,989,915	10	analyzed data	
Vent Gas Stream #4	32,840	627	analyzed data	

FIN <u>B35EWS201</u>	2020 Annual Fuel Information			Emission Factor
	mscf	btu/scf (HHV)	basis for HHV value	lb-NOx/mmbtu
Natural Gas Stream #1	7,063	1,020	site/supplier data	0.066
Natural Gas Stream #2	5,208	1,020	site/supplier data	
Vent Gas Stream #3	237,125	10	analyzed data	
Vent Gas Stream #4	14,537	10	analyzed data	

FIN <u>B34VMTO210</u>	2020 Annual Fuel Information			Emission Factor
	mscf	btu/scf (HHV)	basis for HHV value	lb-NOx/mmbtu
Natural Gas Stream #1	191,037	1,020	site/supplier data	0.0027
Natural Gas Stream #2	231,919	1,020	site/supplier data	
Vent Gas Stream #2A	79,706	65	analyzed data	
Vent Gas Stream #2B	4,706	187	analyzed data	
Vent Gas Stream #2C	17,070	256	analyzed data	
Vent Gas Stream #3A	135,819	121	analyzed data	
Vent Gas Stream #3B	0	833	analyzed data	
Vent Gas Stream #3D	202,164	664	analyzed data	



**Form ECT-1 Support Documentation
Annual Compliance Report
(Title 30 Texas Administrative Code § 101.359)**

FIN	Unit of Measure	2020 Total Heat Input
B72L7HH1	mmbtu	2,788,725
B72L7HH2	mmbtu	2,751,922
B72L7HH3	mmbtu	2,668,220
B72L7HH4	mmbtu	2,935,731
B72L7HH5	mmbtu	2,585,001
OC6L8H1	mmbtu	1,773,130
OC6L8H10	mmbtu	2,446,088
OC6L8H2	mmbtu	1,877,650
OC6L8H3	mmbtu	2,139,428
OC6L8H4	mmbtu	1,789,780
OC6L8H5	mmbtu	2,053,083
OC6L8H6	mmbtu	1,680,456
OC6L8H7	mmbtu	1,821,907
OC6L8H8	mmbtu	2,434,882
OC6L8H9	mmbtu	9,628
OC2L9H120	mmbtu	2,749,074
OC2L9H121	mmbtu	3,977,976
OC2L9H122	mmbtu	4,050,949
OC2L9H123	mmbtu	3,958,847
OC2L9H124	mmbtu	3,867,206
OC2L9H125	mmbtu	3,921,355
OC2L9H126	mmbtu	3,895,340
OC2L9H127	mmbtu	3,900,792
OC2L9H128	mmbtu	3,903,552
OC2L9H129	mmbtu	1,630,767
OC4PHH310	mmbtu	1,146,764
OC4PHH320	mmbtu	1,212,781
OC4PHH330	mmbtu	753,979
OC4PHH340	mmbtu	442,467
A36S621	mmbtu	1,010,375
B56SB1	mmbtu	1,153,737
B56SB2	mmbtu	1,424,755
B56SB3	mmbtu	1,269,036
B56SB4	mmbtu	1,167,685
B56CR96	mmbtu	12,124,686



**Form ECT-1 Support Documentation
Annual Compliance Report
(Title 30 Texas Administrative Code § 101.359)**

FIN	2020 Annual Fuel Information				Emission Factor
	fuel type	mscf	btu/scf (HHV)	basis for HHV value	lb-NOx/mmbtu
OC3DOH61	natural gas	56,617	1,020	site/supplier data	0.034
OC3DOH62	natural gas	58,735	1,020	site/supplier data	0.032
B27P3H503	natural gas	153,067	1,020	site/supplier data	0.028
B27P3H511	natural gas	216,510	1,020	site/supplier data	0.085
B27P3H523	natural gas	154,981	1,020	site/supplier data	0.047
B27P3H521	natural gas	68,589	1,020	site/supplier data	0.045
B41P4TO365	natural gas	14,335	1,020	site/supplier data	0.027
BSRSRDHT	natural gas	1,153	1,020	site/supplier data	0.064
BSRSRHET1	natural gas	39,063	1,020	site/supplier data	0.065
BSRSRHET2	natural gas	28,908	1,020	site/supplier data	0.073
BSRSRH575	natural gas	3,002	1,020	site/supplier data	0.017
BSRSRHSBH	natural gas	3,217	1,020	site/supplier data	0.086
A26VEB500	natural gas	324,132	1,020	site/supplier data	0.0184 0.184
B93P5H510	natural gas	469,136	1,020	site/supplier data	0.035
B93P5H6510	natural gas	405,092	1,020	site/supplier data	0.022

FIN <u>B8MBTO180</u>	2020 Annual Fuel Information			Emission Factor
	mscf	btu/scf (HHV)	basis for HHV value	lb-NOx/mmbtu
Natural Gas Stream #1	80,999	1,020	site/supplier data	0.026
Vent Gas Stream #1	18,957	603	analyzed data	
FIN <u>B8MBTO180</u>	2020 Annual Fuel Information			Emission Factor
	gallons	btu/gallon (HHV)	basis for HHV value	lb-NOx/mmbtu
Vent Liquid Stream #1	1,864,871	81,125	analyzed data	0.026
Vent Liquid Stream #2	2,193,423	68,813	analyzed data	

FIN <u>BSRSRGE14</u>	2020 Annual Fuel Information			Emission Factor
	mscf	btu/scf (HHV)	basis for HHV value	g/hp-hr
Natural Gas Stream	4,763	1,020	site/supplier data	0.059
Engine Heat Rate: 5,050 BTU/hp-hr				



**Form ECT-1 Support Documentation
Annual Compliance Report
(Title 30 Texas Administrative Code § 101.359)**

FIN <u>B33INS1</u>	2020 Annual Stack Exhaust Flow Information	
		units
Stack Exhaust Flow	10,551,133	mscf

FIN <u>B35EWS200</u>	2020 Annual Fuel Information			Emission Factor
	mscf	btu/scf (HHV)	basis for HHV value	lb-NOx/mmbtu
Natural Gas Stream #1	90,141	1,020	site/supplier data	0.054
Natural Gas Stream #2	84,031	1,020	site/supplier data	
Vent Gas Stream #3	3,989,915	10	analyzed data	
Vent Gas Stream #4	32,840	627	analyzed data	

FIN <u>B35EWS201</u>	2020 Annual Fuel Information			Emission Factor
	mscf	btu/scf (HHV)	basis for HHV value	lb-NOx/mmbtu
Natural Gas Stream #1	7,063	1,020	site/supplier data	0.066
Natural Gas Stream #2	5,208	1,020	site/supplier data	
Vent Gas Stream #3	237,125	10	analyzed data	
Vent Gas Stream #4	14,537	10	analyzed data	

FIN <u>B34VMTO210</u>	2020 Annual Fuel Information			Emission Factor
	mscf	btu/scf (HHV)	basis for HHV value	lb-NOx/mmbtu
Natural Gas Stream #1	191,037	1,020	site/supplier data	0.0027
Natural Gas Stream #2	231,919	1,020	site/supplier data	
Vent Gas Stream #2A	79,706	65	analyzed data	
Vent Gas Stream #2B	4,706	187	analyzed data	
Vent Gas Stream #2C	17,070	256	analyzed data	
Vent Gas Stream #3A	135,819	121	analyzed data	
Vent Gas Stream #3B	0	833	analyzed data	
Vent Gas Stream #3D	202,164	664	analyzed data	

**Texas Commission on Environmental Quality
Emissions Banking and Trading Programs
Mass Emissions Cap and Trade (MECT) Program
Supporting Documentation for CEMS and PEMS**

General Information

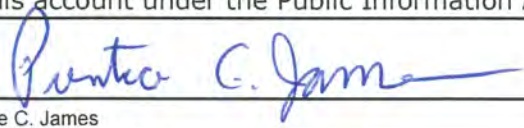
EBT Portfolio Number: PP0182
Company Name: THE DOW CHEMICAL COMPANY
Site Name: DOW TEXAS OPERATIONS FREEPORT
Customer Reference Number: CN600356976
Regulated Entity Reference Number: RN100225945
MECT Control Period: 2020

Verification of Continuous Emissions Monitoring Systems (CEMS) or Predictive Emissions Monitoring Systems (PEMS) Data Used for MECT Program Compliance

Check the boxes to certify that each statement below is true.

☒	For this control period, each CEMS or PEMS used to determine MECT emissions for the site is in compliance with the certification and quality assurance requirements in 30 TAC §117.8100 or §117.8110, as applicable. When applicable, appropriate substitute emission compliance data was used for all periods when the NO _x monitor was off-line.
☐	Information is provided in attached Table 1 for each CEMS or PEMS with downtime that exceeded 5% of the total annual operating hours of the unit during this control period. Additional information is attached to this form to explain the excessive downtime and validate the reported emissions for each CEMS or PEMS that exceeded 5% downtime.

Authorized Account Representative Signature

I certify that I am authorized to make this submission on behalf of the owners and operators of the site and facilities included in this submission. I certify that I have knowledge of the information in this submission and any attachments, and that, based on my knowledge and belief formed after reasonable inquiry, the information is true, accurate, and complete. I acknowledge that I have read and understand <u>Texas Water Code (TWC) §§7.177-7.183</u> , which define criminal offenses for certain violations, including intentionally or knowingly making or causing to be made false material statements or representations in this application, and <u>TWC §7.187</u> , pertaining to criminal penalties. Additionally, I understand that <u>TWC §5.102</u> and <u>Texas Health and Safety Code §382.002</u> authorize the TCEQ to carry out and enforce its rules and associated duties, including the duty to take enforcement actions if these rules are violated. I consent to the release of my contact information, including email address, in connection with information regarding this account under the Public Information Act.	
Signature: 	Date: March 22, 2021
Name: Prentice C. James	
Title: Regional Emissions Manager	
Telephone: 979-238-1443	
Email: pcjames@dow.com	

Print

Reset

Table 1: Summary of NO_x CEMS or PEMS Exceeding 5 % Downtime

FIN	EPN	Total Annual Monitor Downtime (hours)	Citation for Data Substitution Procedures Used	Total Annual Emissions (tpy) from Data Substitution Procedures

Initial Questions

These questions are based on the initial review of the application. This is not an exhaustive list. Additional information may be requested to complete this project.

1. For boiler A26VEB500, the reported emission factor of 0.184 lb/MMBtu appears to be incorrect. Also, based on the reported capacity of 201.9 MMBtu/hr, the emission factor should be different than 0.0184 lb/MMBtu, shown in the supporting documentation. Please provide updated emission factor, emissions, and maximum rated capacity.
4/21 P. James - According to my records, the reported capacity for this FIN was 330,615 MMBTU for 2020. We also reported 30.42 tons-NOx. Not sure what was transmitted to the agency through STEERS, but these are the numbers we reported based on my documentation. Emission factor was 0.184 lb-NOx/MMBTU. The maximum rated capacity is 62 MMBTU/hr.
2. An electronic copy of the stack test report for heater B27P3H523. The maximum rated capacity for the heater and the actual load for each test run should be included in the stack test report, as required by §117.8010(2)(B). If not, please provide also this information.
4/21 P. James - I've attached the stack test report.
3. Please provide the information listed below for thermal oxidizer B34VMT0210.
 - i. Maximum rated capacity, MMBtu/hr. 4/21 P. James - 98 MMBTU/hr.
 - ii. Actual load, MMBtu/hr, for each test run. 4/21 P. James - please see attached stack test
 - iii. Calculations showing how the average emission rate of 1.15 lb/hr, determined from the stack test, was converted to 0.0027 lb/MMBtu.
4/21 P. James - please see attached stack test
 - iv. The emission factor of 0.010 lb/MMBtu, as shown in the supporting documentation, does not match the stack test emission factor. Please update the emissions. - 4/21 P. James - Cut and paste mistake, apologies. I've updated the supporting documentation and attached. Information is correct in STEERS.
4. Maximum rated capacity and actual load for each test run for thermal oxidizer B41P4TO365.
4/21 P. James - Max rated capacity is 75 MMBTU/hr. I've attached the stack test results.
5. Please provide the information listed below for engine BSRSRGE14.
 - i. Maximum rated capacity, hp. 4/21 P. James - 1,000 hp
 - ii. Actual load, hp, for each test run. 4/21 P. James - Stack test attached.
 - iii. Calculations showing how the average emission rate of 0.13 lb/hr, determined from the stack test, was converted to 0.059 g/hp-hr.
4/21 P. James - using the stack test information and the 1,000 hp rating of the engine -
$$\text{NOx: } (0.13 \text{ lb/hr}) * (453.5924 \text{ g/lb} / 1000 \text{ hp}) = 0.059 \text{ g/hp*hr}$$
6. For furnace OC2L9H120, the stack test emission factor of 0.009 lb/MMBtu does not match the emission factor, 0.00777 lb/MMBtu, which was used to calculate the emissions. Please

clarify. 4/21 P. James - This FIN is equipped with CEMS so the stack test factor is not applicable (normally) for reporting.

7. For furnace OC2L9H129, the stack test emission factor of 0.009 lb/MMBtu does not match the emission factor, 0.007844 lb/MMBtu, which was used to calculate the emissions. Please clarify. 4/21 P. James - This FIN is equipped with CEMS so the stack test factor is not applicable (normally) for reporting.

From: [Joseph Musa](#)
To: [James, Prentice \(P\)](#)
Cc: [Melissa Ruano](#)
Subject: RE: Response needed by June 23: MECT Annual Compliance Report for Dow Texas Operations Freeport Site (Project Number 416254)
Date: Friday, June 25, 2021 2:56:00 PM

Mr. James:

Based on the assertion by the facility that the 2003 performance test is representative of the current operating conditions, the emission factor of 0.0027 lb/MMBtu, determined from the 2003 performance test, may be used for determining the NOx emissions for 2020. No further action is needed.

Joseph Musa

From: James, Prentice (P) <PCJames@dow.com>
Sent: Wednesday, June 23, 2021 5:39 PM
To: Melissa Ruano <melissa.ruano@tceq.texas.gov>
Cc: Joseph Musa <joseph.musa@tceq.texas.gov>
Subject: RE: Response needed by June 23: MECT Annual Compliance Report for Dow Texas Operations Freeport Site (Project Number 416254)

Good afternoon,

Thanks as always for your patience and understanding. Here is the reply from the facility regarding your inquiry:

"The emission factor of 0.0027 lbs/MMBTU derived from the 2003 performance test is being used for 2020 NOx emissions. The 2018 performance test of the B3400 Flameless Thermal Oxidizer (FTO) was performed under non-routine worst expected case NOx emission conditions which are not conditions that would be considered normal or representative of normal operations or emissions for the FTO. As a follow-up to that test, the operating conditions were optimized to reduce the thermal release rate and adjust the air to fuel ratio to reduce the NOx emission rate. The 2003 performance test is representative of the current operating conditions."

Please let me know how we should proceed and I will follow-up with the agency or facility as needed. Again, thanks for your patience as the facility worked to address your questions.

Kind regards,

Prentice

Prentice C. James
Regional Emissions Manager
The Dow Chemical Company - Texas Operations
Office# 979.238.1443
pcjames@dow.com

General Business

From: Melissa Ruano <melissa.ruano@tceq.texas.gov>
Sent: Tuesday, June 22, 2021 8:36 AM
To: James, Prentice (P) <PCJames@dow.com>
Cc: Joseph Musa <joseph.musa@tceq.texas.gov>; Schroeder, Elaine (EM) <Eschroeder@dow.com>
Subject: RE: Response needed by June 23: MECT Annual Compliance Report for Dow Texas Operations Freeport Site (Project Number 416254)

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.

Good Morning Mr. James,

Thank you for your response and attention to this issue. We will look forward to receiving response. If you wouldn't mind, could you please provide an update tomorrow on the status of the information, if you have not heard back from the data owners.

Thank you!

Sincerely,

Melissa Ruano

Emissions Banking and Trading Program Team Leader
Texas Commission on Environmental Quality
Air Permits Division

Email: Melissa.Ruano@tceq.texas.gov

How is our customer service? Fill out our customer satisfaction survey at www.tceq.texas.gov/goto/customersurvey

Sign up to receive e-mail updates on EBT programs. Select *Emissions Banking and Trading (EBT) Program* under the *Air Quality* heading.

From: James, Prentice (P) <PCJames@dow.com>
Sent: Monday, June 21, 2021 6:22 PM
To: EBTTTL <EBTTTL@tceq.texas.gov>
Cc: Joseph Musa <joseph.musa@tceq.texas.gov>; Schroeder, Elaine (EM) <Eschroeder@dow.com>
Subject: RE: Response needed by June 23: MECT Annual Compliance Report for Dow Texas Operations Freeport Site (Project Number 416254)

Good afternoon,

Thanks for the notification. I've reached out to the facility in question regarding the inquiry. To

date, I have not yet heard back from the data owners. I will keep you posted and respond as soon as the data owner addresses your questions.

Thanks as always for your patience and understanding.

Kind regards,

Prentice

Prentice C. James
Regional Emissions Manager
The Dow Chemical Company - Texas Operations
Office# 979.238.1443
pcjames@dow.com

General Business

From: EBTTTL <EBTTTL@tceq.texas.gov>
Sent: Monday, June 21, 2021 2:48 PM
To: James, Prentice (P) <PCJames@dow.com>
Cc: Joseph Musa <joseph.musa@tceq.texas.gov>
Subject: Response needed by June 23: MECT Annual Compliance Report for Dow Texas Operations Freeport Site (Project Number 416254)
Importance: High

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.

Good Afternoon Mr. James,

This message regards the MECT Annual Report for Dow Texas Operations, EBT Project 416254.

I am following up on the requests for information that were sent to you by Mr. Joseph Musa on June 16 and June 11. Please see the emails below. This information is needed to complete the 2020 report.

If you could please provide response by **Wednesday, June 23, 2021** to Mr. Musa's questions, we will appreciate it.

Thank you for your assistance and attention to this issue.

Sincerely,

Melissa Ruano
Emissions Banking and Trading Program Team Leader
Texas Commission on Environmental Quality

Air Permits Division

Email: Melissa.Ruano@tceq.texas.gov

How is our customer service? Fill out our customer satisfaction survey at www.tceq.texas.gov/goto/customersurvey

Sign up to receive e-mail updates on EBT programs. Select *Emissions Banking and Trading (EBT) Program* under the *Air Quality* heading.

From: Joseph Musa

Sent: Wednesday, June 16, 2021 3:07 PM

To: 'James, Prentice (P)' <PCJames@dow.com>

Subject: RE: MECT Annual Compliance Report for Dow Texas Operations Freeport Site

Mr. James:

As a follow up to my previous email, the emission factor for the thermal oxidizer may be converted to an equivalent value in lb/MMBtu by dividing the mass emission rate by the rated capacity of the unit, which is consistent with the method used for engine BSRSRGE14. Please let me know if the emission factor can be updated to 0.0117 lb/MMBtu (1.15 lb/hr * 1/98 MMBtu/hr).

Joseph Musa

From: Joseph Musa

Sent: Friday, June 11, 2021 2:19 PM

To: James, Prentice (P) <PCJames@dow.com>

Subject: RE: MECT Annual Compliance Report for Dow Texas Operations Freeport Site

Mr. James:

The project was reviewed by management, and there was a question concerning the derivation of the emission factor of 0.0027 lb/MMBtu for thermal oxidizer B34VMTO210. On further review of the provided document (attached), I noted that the data used to derive the emission factor was compiled during the 2003 stack test and may not apply to the 2018 test. The emission factor determined from the 2018 test is 1.15 lb/hr. Please provide an updated emission factor in units of lb/MMBtu and an explanation on the calculations used to derive the value.

Joseph Musa

From: [EBTTL](#)
To: [PSSMGR](#)
Cc: [Joseph Musa](#)
Subject: For Review and Approval by 6/30/21: MECT Audit Report 416254
Date: Monday, June 28, 2021 11:04:26 AM
Attachments: [416254-MECT RP_P0182.pdf](#)
[416254 CTAL.docx](#)
[416254 CTTR.docx](#)
[416254 Route Slip.docx](#)
[B27P3H523_B27S523.docx](#)
[B41P4TQ365_B41TQ365.docx](#)
[B93P6H6510_B93H6510.docx](#)
[BSRSRGE14_BSRGE14.docx](#)

Please find the attached documents for MECT Audit 416254. The target date is 6/29; however I marked the deadline as 6/30. If you feel that this project could be expedited to meet the target date, please change the deadline.

Please let us know if you have questions.

Thanks!
Melissa

From: Joseph Musa <joseph.musa@tceq.texas.gov>
Sent: Friday, June 25, 2021 3:40 PM
To: EBTTL <EBTTL@tceq.texas.gov>
Subject: For Review and Approval by 6/29/21: MECT Audit Report 416254

Melissa:

Please find the attached documents for the referenced project. The technical review and the stack test reviews for units B27P3H523 and BSRSRGE14 were updated. The 2003 stack test report for unit B34VMTO210 was reviewed in project number 412809. Concerning unit B27P3H523, I could not locate the stack test report in WCC.

Joseph

From: EBTTL <EBTTL@tceq.texas.gov>
Sent: Thursday, June 10, 2021 8:26 PM
To: Joseph Musa <joseph.musa@tceq.texas.gov>
Subject: MECT Audit Report 416254
Importance: High

Hi Joseph,

Please find my edits/additions/comments to your technical review as well as to the stack test reviews for B27P3H523, B34VMTO210, and BSRSRGE14. Also, for FIN B27P3H523, it looks like the

stack test was reviewed with report project 412809. Is there a reason that you re-reviewed the report for this unit?

Please address my edits and return this project for my review.

Thanks!

Melissa

From: Joseph Musa <joseph.musa@tceq.texas.gov>

Sent: Friday, May 28, 2021 1:29 PM

To: EBTTTL <EBTTTL@tceq.texas.gov>

Subject: For Review and Approval by 6/2/21: MECT Audit Report 416254

Melissa:

Please find the attached documents for the referenced project. The stack test reports are saved on the H drive Temp Files.

Joseph Musa
(512) 239-3328

From: [Beryl Thatcher](#)
To: [PSSMGR](#)
Cc: [EBTTL](#); [Joseph Musa](#)
Subject: RE: For Review and Approval by 6/30/21: MECT Audit Report 416254
Date: Wednesday, June 30, 2021 7:31:51 AM

Approved

From: PSSMGR <PSSMGR@tceq.texas.gov>
Sent: Monday, June 28, 2021 2:18 PM
To: Beryl Thatcher <Beryl.Thatcher@Tceq.Texas.Gov>
Cc: EBTTL <EBTTL@tceq.texas.gov>; Joseph Musa <joseph.musa@tceq.texas.gov>
Subject: FW: For Review and Approval by 6/30/21: MECT Audit Report 416254

Please find the attached documents for MECT Audit 416254

APD Emissions Banking and Trading Correspondence Route Slip

Decision Due Date: 6/30/2021

Project Type: MECT Audit Report

Project No: 416254

	Initials	Date	Comments
Joseph Musa, Project Manager	JM	5/28/2021	Re-sent 6/25/2021 with updated technical review and stack test reviews for units B27P3H523 and BSRSRGE14.
Melissa Ruano, Team Leader	MR	6/28/2021	
Daniel Menendez, Section Manager			
Beryl Thatcher, Assistant Director			
Sam Short, Division Director			
Mailout Information			
Emailed 6/30/2021			

From: [Joseph Musa](#)
To: [James, Prentice \(P\)](#)
Cc: jodiey@brazoria-county.com
Subject: TCEQ EBT Document - MECT Report
Date: Wednesday, June 30, 2021 3:27:00 PM
Attachments: [416254 The Dow Chemical Company .pdf](#)

Please see the attached EBT document for project number 416254. For additional information about this project, visit the [TCEQ EBT Database](#). If you have any questions, please see the contact information in the last paragraph of the attached letter.

Texas Commission on Environmental Quality

EBT Programs

(512) 239-4900

ebt@tceq.texas.gov