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File Series/TCEQ ID/Folder Code:	IWD/ WQ0002436 -000/CO
County Name, if no TCEQ ID:	

EPA

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Washington, D.C. 20460

Form Approved
OMB No. 2040-0003
Approval Expires 3-31-85

NPDES Compliance Inspection Report

Section A: National Data System Coding

Transaction Code	NPDES	yr/mo/day	Inspec. Type	Inspector	Fac Type
1 N 2 5 3	T X 0 0 8 5 5 7 0 11 12	0 6 1 0 2 6 17	18 C	19 S	20 2

Remarks: S T A T E P E R M I T W Q 0 0 0 2 4 3 6 - 0 0 0

Inspection Work Days	Facility Evaluation Rating	BI	QA	Reserved
67	69 70 3	71 N	72	73 74 75 80

Section B: Facility Data

Name and Location of Regulated Entity Inspected *(For industrial users discharging to POTW, also include POTW name and NPDES permit number)* FORMOSA PLASTICS CORPORATRION, TEXAS 201 FORMOSA DRIVE, CITY OF POINT COMFORT, TEXAS 77978-0700	Entry Time /Date 9:00 AM 10/26/2006 Exit Time/Date 4:00 PM 10/27/2006	Permit Effective Date 08/30/2006 Permit Expiration Date 08/30/2010
Name(s) of On-Site Representative(s)/Title(s)/Phone and Fax Number(s) MR. KELLY J. LONG, ENVIRONMENTAL ENGINEERING STAFF (361) 987-7463 FAX 987-2363		Other Facility Data
Name, Address of Responsible Official/Title/Phone and Fax Number MR.R. P. SMITH, VICE PRESIDENT / GENERAL MANAGER P. O. BOX 700, POINT COMFORT, TEXAS 77978-0700 (361) 987-7000 FAX 987-2363	Contacted Yes X No	

Section C: Areas Evaluated During Inspection

(S = Satisfactory, M = Marginal, U = Unsatisfactory, N = Not Evaluated)

S	Permit	S	Flow Measurement	S	Operations & Maintenance	N	CSO/SSO
S	Records/Reports	S	Self-Monitoring Program	S	Sludge Handling/Disposal	N	Pollution Prevention
S	Facility Site Review	S	Compliance Schedules	N	Pretreatment	N	Multimedia
S	Effluent/Receiving Waters	S	Laboratory	N	Storm Water	N	Other:

Section D: Summary of Findings/Comments (Attach additional sheets if necessary)

SEE SUMMARY OF INVESTIGATION FINDINGS FOR OUTSTANDING ALLEGED VIOLATIONS.

SEE COMMENT SECTION OF THE CCEDS REPORT.

RECEIVED
JAN 17 2007
6EN-WW

Name(s) and Signature(s) of Inspector(s) RAMON G. JUAREZ Ramon G. Juarez	Agency/Office/Telephone/Fax TCEQ / R14 -CORPUS CHRISTI/ (361)-825-3100/3101	Date 12/07/ 2006
Signature of Management QA Reviewer DAVID M. KENNEBECK DM Kennebeck	Agency/Office/Phone and Fax Numbers TCEQ / R14 -CORPUS CHRISTI/ (361)-825-3100/3101	Date 12/15/2006

EPA Form 3560-3 (Rev. 9-94) Previous editions are obsolete.

Texas Commission on Environmental Quality
Investigation Report
FORMOSA PLASTICS CORPORATION TEXAS
CN600130017

FORMOSA POINT COMFORT PLANT
RN100218973

Investigation # 517230

Incident #

Investigator: RAMON JUAREZ

Site Classification
INDUSTRIAL MAJOR

Conducted: 10/26/2006 -- 10/27/2006

SIC Code: 2821
NAIC Code: 325211

Program(s): WASTEWATER

Investigation Type : Compliance Investigation

Location : INTXN OF FM 1593 & HWY 35 EXTENDING 1.8 MI N ON E SIDE OF FM 1593 & 1.7 MI E ON N SIDE HWY 35

Additional ID(s) : TX0085570
WQ0002436000

Address: 201 FORMOSA DRIVE GATE 3; POINT COMFORT, TX 77978

Activity Type : REGION 14 - CORPUS CHRISTI
WWCCIMDMAJ - WW CCI Mandatory Major

Principal(s) :

Role	Name
RESPONDENT	FORMOSA PLASTICS CORPORATION TEXAS

Contact(s) :

Role	Title	Name	Phone	
Regulated Entity Contact	ENVIRONMENTAL ENGINEERING STAFF	MR KELLY LONG		(361) 987-2363
			Work	(361) 987-7463
Participated in Investigation	COMBINED WATER TREATMENT PLANT DAY SUPERVISOR	MR MARK SCHOENER	Work	(361) 987-7468
				(361) 987-2363
Regulated Entity Mail Contact	VICE PRESIDENT/GENERAL MANAGER	MR R.P. SMITH	Work	(361) 987-7000
Participated in Investigation	ENVIRONMENTAL MANAGER	MR DAVID HILL	Work	(361) 987-7442

Other Staff Member(s) :

Role	Name
QA Reviewer	BARBARA BEYNON
Supervisor	DAVID KENNEBECK

Associated Check List

Checklist Name	Unit Name
WQ GENERAL CCI CHECKLIST	FPC No. 1
WQ INDUSTRIAL CCI	FPC No. 2

Investigation Comments :

INTRODUCTION
The Formosa Plastics Corporation wastewater treatment plant (WWTP) was investigated on October 26 and 27, 2006 to determine compliance with applicable wastewater treatment regulations. The facility was notified of the investigation on October 12, 2006. This investigation is considered a mandatory comprehensive compliance investigation. An exit interview, explaining the results of the investigation was conducted on October 27, 2006 with Mr. Kelly Long, Environmental Engineer and Mr.

David Hill, Environmental Manager. The exit interview form is attached to this report as Attachment No. 1. A Notice of Violation letter was issued on November 18, 2006 to facilitate compliance.

GENERAL FACILITY AND PROCESS INFORMATION
The Formosa Plastics Corporation, Point Comfort facility (FPC TX) manufactures organic and inorganic chemicals, plastics, and synthetic fibers. Formosa's Combined Wastewater Treatment Plant (CWTP) is permitted to discharge remediated groundwater and combined internal wastewater streams at a daily average flow not to exceed 9.7 MGD at outfall 001.

The CWTP consists of a three-train biological treatment process, a physical treatment process, and a sanitary treatment package plant. Two internal outfalls, outfall 101 and outfall 201, commingle prior to discharge at outfall 001. The effluent from outfall 101 consists of process wastewater, storm water, and utility wastewater treated in two of the biological trains (A and B trains) of the CWTP. The effluent from outfall 201 consists of utility and Ion Exchange Membrane (IEM) wastewater streams treated in the physical treatment train of the CWTP. The treated domestic wastewater and treated process polyvinyl chloride (PVC) wastewater from one of the biological trains (C train) are recycled for use as cooling tower make-up water.

Outfalls 002 through 012 are authorized for the discharge of non-process area storm water, hydrostatic test water, fire water, non-contact steam condensate, and non contact wash water.

Outfalls 001 and 011 discharge via pipeline to Lavaca Bay / Chocolate Bay in Segment No. 2453 of the Bays and Estuaries. Outfalls 002 through 010 and outfall 012 discharge to unnamed tributaries, thence to Cox Creek, thence to Cox Creek Lake, thence to Cox Bay in Segment No. 2454 of the Bays and Estuaries. The water quality permit for this facility was issued on August 30, 2005 and will expire on August 1, 2010.

The primary flow-measuring devices for Outfalls 001, 101, and 201 are magnetic closed conduit flow meters. A flow accuracy check cannot be performed on these types of meters. In house technicians calibrate the flow meters once per month.

The effluent samples were collected from outfall 001. The sample analysis results are attached to this report as Attachments Nos. 2 through 8, Investigation Sample Results, Attachment No. 9, Chain of Custody (COC), and Attachments No. 10 through 19, Laboratory Test Results. The sample results were compliant with permit limits.

At the time of the investigation, the receiving waters (001 outfall Lavaca Bay) appeared clear with no foaming, floating materials, or sludge noted.

Effluent samples are collected by FPC TX plant operators and analyzed by the in- house laboratory for all permit required parameters. At outfalls 001, 101, and 201, field measurements of pH, dissolved oxygen, and temperature are analyzed by in- line equipment. At outfalls 002 through 011, pH is measured by the in-house laboratory. Biomonitoring analyses are performed by PBS & J Laboratory in Houston, Texas. The FPC TX in-house laboratory participates in the EPA's DMR QA program, which is a laboratory proficiency performance test. Analytes of unknown concentrations are submitted to participating laboratories for analyses and evaluation. FPC TX submitted acceptable results for all analytes during the most recent evaluation.

Sludge from the biological and physical treatment processes are dewatered by two belt presses. The sludge is classified as a Class II, non-hazardous waste and is transported by a registered hauler to the Waste Management Coastal Plains landfill in Alvin, Texas for disposal.

BACKGROUND
A file review was conducted prior and after the investigation to evaluate historical compliance issues concerning the facility since the last investigation. The regional files and self-reporting data from January 2004 through September 2006 were reviewed.

ADDITIONAL INFORMATION
A walk-through of the CWTP was conducted with facility personnel. The entire CWTP is contained within concrete berms. Storm water, overflows, and spills which occur in the contained area are

drained to the head of the CWTP for treatment. The capacity of the dike wall and trench containment area for the A/B blocks of the CWTP is 6.23 MG. The capacity of the dike wall and trench containment area for the C Block of the CWTP is 2.51 MG.

Storm water outfalls 002 through 011 were observed during the investigation. All storm water outfalls are monitored by FPC TX personnel twice per day. Each of the outfalls is equipped with a gate which remains shut until the water is sampled and found to meet the permitted limits. None of the outfalls were discharging at the time of observation; however, some of the storm water conveyances contained water from a recent rainfall. No unusual conditions were noted.

During the investigation conducted October 26, 2006, a site inspection to Channel Marker 22 was conducted to review the method used by Formosa Plastics Corporation - Texas (FPC-TX) to comply with provision No. 13; Other Requirements from the TPDES Permit No. WQ0002436-000. Provision No. 13 states:

"At times when the natural depth of the Upper Lavaca Bay at Channel Marker 22 is less than one foot deep, the permittee shall cease discharge until the water level at the Channel Marker 22 exceeds one foot in depth. The permittee shall install a staff gauge or alternative equipment in the vicinity of Channel Marker 22 and read it on daily basis to comply with this requirement. These readings shall be kept in a bound log book and be available to authorized representative of the TCEQ upon request. Natural depth is defined as the depth of water from the surface to the natural bottom, i.e., bottom that is unaffected by man-made conditions ".

A procedure was implemented by FPC-TX personnel outlined in a document dated October 7, 1993. According to this document a depth correlation between the dock and Channel Marker 22 was determined. The depth measurements indicated a depth differential of 1 to 1.5 feet. The average depth at the dock is 3 feet. The average depth at Channel Marker 22 is 4 feet. From this observation, FPC-TX personnel infer that if the dock were completely dry, the one foot depth requirement (Provision No. 13) would not be met. The actual depth at Channel Marker 22 was not verified.

A log of data with depth correlations was evaluated and reviewed. The following items were noted. A 2.5 foot constant is being added to each dock measurement. The inferred 2.5 foot constant is subject to change due to environmental conditions of the bay and is an average of numerous measurements collected by FPC- TX personnel.

During the investigation conducted October 26, 2006, Dock and Channel Marker 22 measurements were collected. The Dock measurement from the surface of the water to the bottom of the bay measured 2.3 feet. The Channel Marker 22 measurement from the surface of the water to the bottom of the bay measured 4.2 feet. The depth measurements indicated a depth differential of 1.9 feet. According to FPC-TX personnel the diffuser is partially buried and is connected to a 36-inch pipe. The one- foot depth requirement is the distance from the diffuser to the surface of the water. The exact location of the diffuser is needed to determine the depth in reference to the natural bottom of the bay. The installation of a staff gauge or automated water level device is needed to establish a station datum at Channel Marker 22 from which all subsequent recorded water levels can be referenced. The permit requires daily water level measurements by a staff gauge or automated water level device.

NOV Date	Method
12/18/2006	WRITTEN

ALLEGED VIOLATIONS NOTED AND RESOLVED

Track No: 261664 **Resolution Date: December 06 06**

TWC Chapter 26.121(a)(1)
PERMIT TPDES Permit No. WQ0002436-008
Effluent Limitations & Monitoring Requirements; No.1; page 2; The permittee is authorized to discharge non-process area storm water, hydrostatic test water, fire water, non-contact steam condensate, and non-contact wash water.

Alleged Violation:
Investigation: 517230 Comment Date: 12/06/2006

Failure to prevent an unpermitted discharge of cooling tower blow down water via outfall 008. On the morning of July 8, 2006, a contractor at Formosa Plastics Corporation - Texas (FPC-TX) was excavating in the utilities area when a track hoe struck and damaged an underground 8-inch cooling tower blow down pipeline. The blow down water entered the storm water ditch which was already full with storm water due to heavy rain in the area. The commingled storm water and blow down water overflowed the gate structure at outfall 008. The combined discharged was estimated to be 140,000 gallons.

Recommended Corrective Action: The permittee is authorized to discharge non-process area storm water, hydrostatic test water, fire water, non-contact steam condensate, and non-contact wash water via out fall 008. Cooling tower blow down water is not authorized for discharge by the permit.

Resolution: The pipe line was isolated and repaired. Vacuum trucks were called out to capture as much of the blow down water as possible for diversion to the wastewater treatment plant. An incident investigation was conducted. Formosa environmental and wastewater personnel reported the incident according to TCEQ Non-Compliance Notification Protocol. The documentation is dated July 28, 2006 and was received on July 31, 2006. The Non-Compliance Notification is attached to this report as Attachment No. 20.

Track No: 261668 **Resolution Date: December 06 06**

30 TAC Chapter 305.125(1)
PERMIT TPDES Permit No. WQ0002436-008
Effluent Limitations & Monitoring Requirements; No.1; page 2.

Alleged Violation:
Investigation: 517230 Comment Date: 12/06/2006

Failure to meet daily maximum discharge loading limit for total zinc at outfall 001. The facility reported 9.28 lbs/day loading for May 30, 2006. The daily maximum limit of 5.5 lbs /day of total zinc was exceeded. On May 29, 2006, the Chlor Alkli unit experienced a hydrochloric acid tank failure. The acid was contained within a secondary containment structure. The acid leached zinc from galvanized metal within the immediate area. This resulted in zinc deposited in the wastewater when the containment area was cleaned out and sent to the Combined Water Treatment Plant (CWTP) for treatment prior to discharge.

Recommended Corrective Action: The effluent shall comply with effluent limitations for total zinc lbs/day (loading) daily maximum. Submit immediately to the Region office a description of the corrective action that has been taken or is underway to become compliant with the permit limit.

Resolution: On May 29 & 30, 2006 the CWTP began to see elevated concentrations of zinc in the Chlor-Alkli unit wastewater. In response the CWTP increased the injection rate of metal reducing polymers to the treatment train, restricted the wastewater flow from the Chlor-Alkli unit and increased the sludge blow down from the clarifier to start removing zinc from the treatment unit. On May 31, 2006 the zinc concentrations from the Chlor-Alkli unit increased. In response the CWTP shut down the flow of incoming water from the Chlor-Alkli unit, reduced the flow from the treatment train to the final mixing sump and maintained a continous blow down from the clarifier. On June 2, 2006 zinc concentrations within the treatment train was reduced within specifications for the daily maximum (loading). Formosa personnel reported the incident according to TCEQ Non-Compliance Notification Protocol. The documentation is dated June 9, 2006 and is attached to this report as Attachment No. 21.

Track No: 261678 **Resolution Date: December 15 06**

30 TAC Chapter 305.125(1)
PERMIT TPDES Permit No. WQ0002436-001
Effluent Limitations & Monitoring Requirements; No. 2; page 2a; & Other Requirements; No. 9 (a), (b), (c); page 14. The permittee shall maintain the pH not to be less 6.0 SU nor greater than 9.0 SU and shall not exceed 60 minute duration limit for outfall 001.

Alleged Violation:
Investigation: 517230 Comment Date: 12/06/2006

Failure to meet effluent limitation for pH maximum and duration at outfall 001. On October 6, 2005, the Texas Commission on Environmental Quality (TCEQ) Region 14 office received notification of an explosion and fire at the Formosa Plastics facility. The explosion was caused by a trailer hitting a six inch propylene line in the Olefins II unit causing it to rupture. The pH violation occurred on October 6, 2005, the day of the explosion and fire in the Olephins II unit. The pH violation is indirectly associated with the incident because it was caused by operator error during the evacuation process. The pH was reported at 9.0 SU to 10.5 SU for 74 minutes. The pH duration limit of 60 minutes above 9.0 SU and less than 11.0 SU was exceeded by 14 minutes.

Recommended Corrective Action: The permittee shall maintain the pH not to be less than 6.0 SU nor greater than 9.0 SU and shall not exceed 60 minute duration limit for outfall 001.

Resolution: As soon as emergency personnel were allowed to enter the wastewater control room, the discharge to Lavaca Bay was stopped, ending the pH maximum violation. Formosa environmental and wastewater personnel reported the incident according to TCEQ Non-Compliance Notification Protocol. The documentation is dated October 14, 2006 and is attached to this report as Attachment No. 22.

Track No: 261681 **Resolution Date: December 15 06**

30 TAC Chapter 305.125(1)
PERMIT TPDES Permit No. WQ0002436-010
Effluent Limitations & Monitoring Requirements; No. 2; page 2g.
The permittee shall maintain the pH not to be less 6.0 SU nor greater than 9.0 SU.

Alleged Violation:
Investigation: 517230 Comment Date: 12/06/2006

Failure to meet effluent limitation for pH maximum at outfall 010. On July 22, 2005, intermittent heavy rains had been falling through the day causing the storm ditches and outfall 010 to fill. The gate was opened and the discharge sampled. The results indicated a 9.4 SU, exceeding the pH maximum permit limit of 9.0 SU. The gate was immediately closed. The pH violation is attributed to a temporary pH spike in the flow. Additional samples were taken after the gate was closed. The results were within the pH maximum permit limit of 9.0 SU

Recommended Corrective Action: The permittee shall maintain the pH not to be less than 6.0 SU nor greater than 9.0 SU.

Resolution: Immediately upon discovery of the high pH spike the gate at outfall 010 was closed to prevent further discharge of suspect storm water. Formosa environmental and wastewater personnel reported the incident according to TCEQ Non-Compliance Notification Protocol. The documentation is dated July 29, 2005 and is attached to this report as Attachment No. 23.

Additional Issues

Description	Additional Comments
ITEM	During the investigation conducted October 26, 2006, Dock and Channel Marker 22 measurements were collected. The Dock measurement from the surface of the water to the bottom of the bay measured 2.3 feet. The Channel Marker 22 measurement from the surface of the water to the bottom of the bay measured 4.2 feet. The depth measurements indicated a depth differential of 1.9 feet. According to FPC - TX personnel the diffuser is partially buried and is connected to a 36-inch

pipe. The one-foot depth requirement is the distance from the diffuser to the surface of the water. The exact location of the diffuser is needed to determine the depth in reference to the natural bottom of the bay. The installation of a staff gauge or automated water level device is needed to establish a station datum at Channel Marker 22 from which all subsequent recorded water levels can be referenced. The permit requires daily water level measurements by a staff gauge or automated water level device.

ITEM

An inspection of the Lavaca Bay Diffuser was conducted on November 9, 2005. The inspection report indicated the conditions of the diffuser as functional and flowing. However, there are concerns regarding excessive sediment, debris, and marine growth on the exterior concrete and cages around the nozzles. The diver recommended the diffuser be cleaned so that a proper inspection can be conducted.

Signed Rani Z. Gray
Environmental Investigator

Date 12/15/2006

Signed Kelly Rubble for David Kornbach
Supervisor

Date 12/18/2006

Attachments: (in order of final report submittal)

___Enforcement Action Request (EAR)
✓ Letter to Facility (specify type) : R-NOV
Investigation Report
✓ Sample Analysis Results 2-19
___Manifests
___NOR

___Maps, Plans, Sketches
___Photographs
✓ Correspondence from the facility 20-23
✓ Other (specify) : 1
EXIT INTERVIEW FORM

Investigation QA Appendix

Investigation #: 517230
Reg Ent: FORMOSA POINT COMFORT PLANT
Conducted: 10/26/2006 09:00 - 10/27/2006 16:00 **Notif Dt: 10/12/2006**

No Associated Incidents

NOV	Method
12/18/2006	WRITTEN

Staff Tasks

LEAD INVESTIGATOR	RAMON JUAREZ	Tasks:	12 hrs. INVEST 40 hrs. POSTINVEST 12 hrs. PREINVEST 8 hrs. TRAVEL
QA REVIEWER	BARBARA BEYNON	Tasks:	.5 hrs. QA

Documents Received

Submitted By	Document Type	Received Dt	Activity Dt	Document Dt
Formosa Plastics Corporation, Texas	RESPONSE TO NOV/NOE	07/31/2006	01/01/0001	07/28/2006
Formosa Plastics Corporation, Texas	RESPONSE TO NOV/NOE	06/11/2006	01/01/0001	06/09/2006
Formosa Plastics Coorporation, Texas	RESPONSE TO NOV/NOE	10/17/2005	01/01/0001	10/14/2005
Formosa Plastics Corporation, Texas	RESPONSE TO NOV/NOE	07/30/2005	01/01/0001	07/29/2005

Communication History

FINEXITINT	12/06/2006
PHOEMALFAX	10/12/2006

Fiscal Year	Activity Type
2007	WWCCIMDMAJ - WW CCI Mandatory Major

Risk-Based Criteria

WATER Discharge to Impaired Segments
Regional KnowledgeExperience
PermitAuthorization Exceedances
Proximity to Receptors

Alleged Violations

Checklist: **NO ASSOCIATED CHECKLIST**

Chklist Item:

Abbr Disc: Failure to prevent an unpermitted discharge of cooling tower blow down water via outfall 008.

Viol Comment: TPDES Permit No. WQ0002436-008; Effluent Limitations & Monitoring Requirements; No.1; page 2; The permittee is authorized to discharge non-process area storm water, hydrostatic test water, fire water, non-contact steam condensate, and non-contact wash water.
The Texas Water Code, Chapter 26.121 Unauthorized Discharges Prohibited, (a) except as authorized by the commission, no person may: (1) discharge sewage, municipal waste, recreational waste, agricultural waste, or industrial waste into or adjacent to any water in the state.

Citation(s): PERMIT TPDES Permit No. WQ0002436-008 Effluent Limitations & Monitoring Requirements; No.1; page 2; The permittee is authorized to dischar
TWC Chapter 26.121(a)(1)

Principal: FORMOSA PLASTICS CORPORATION TEXAS

Program: WASTEWATER

Track #: 261664

Classification: MODERATE Self Reported: NO

Status Code & Date:	RESOLVED, 12/06/2006	Immunity Granted:	NO
Compliance Plan Requested:	NO	Repeat Violation:	NO
Cat & Sub Cat Code:	B, B14	EPA Class:	N/A
Viol Start Dt:	07/08/2006	Refer to Investigation:	YES
Viol End Dt:	07/09/2006	Compliance Due Date:	01/15/2007

Viol Comment: TPDES Permit No. WQ0002436-008; Effluent Limitations & Monitoring Requirements; No.1; page 2.
Title 30 Part 1, Chapter 305, Subchapter F, Rule 305.125, (1)
(1) The permittee has a duty to comply with all permit conditions. Failure to comply with any permit condition is a violation of the permit and statutes under which it was issued and is grounds for enforcement action, for permit amendment, revocation or suspension, or for denial of a permit renewal application or an application for a permit for another facility.

Citation(s): PERMIT TPDES Permit No. WQ0002436-008 Effluent Limitations & Monitoring Requirements; No.1; page 2.
30 TAC Chapter 305.125(1)

Principal: FORMOSA PLASTICS CORPORATION TEXAS
Program: WASTEWATER
Track #: 261668

Classification:	MODERATE	Self Reported:	NO
Status Code & Date:	RESOLVED, 12/06/2006	Immunity Granted:	NO
Compliance Plan Requested:	NO	Repeat Violation:	NO
Cat & Sub Cat Code:	B, B19	EPA Class:	N/A
Viol Start Dt:	05/30/2006	Refer to Investigation:	YES
Viol End Dt:	05/31/2006	Compliance Due Date:	01/14/2007

Viol Comment: Title 30 Part 1, Chapter 305, Subchapter F, Rule 305.125, (1)
(1) The permittee has a duty to comply with all permit conditions. Failure to comply with any permit condition is a violation of the permit and statutes under which it was issued and is grounds for enforcement action, for permit amendment, revocation or suspension, or for denial of a permit renewal application or an application for a permit for another facility.

TPDES Permit No. WQ0002436-001; Effluent Limitations & Monitoring Requirements; No. 2; page 2a; & Other Requirements; No. 9 (a), (b), (c); page 14.
The permittee shall maintain the pH not to be less 6.SU nor greater than 9.0 SU and shall not exceed 60 minute duration limit for outfall 001.

Citation(s): PERMIT TPDES Permit No. WQ0002436-001 Effluent Limitations & Monitoring Requirements; No. 2; page 2a; & Other Requirements; No. 9 (a), (b)
30 TAC Chapter 305.125(1)

Principal: FORMOSA PLASTICS CORPORATION TEXAS
Program: WASTEWATER
Track #: 261678

Classification:	MODERATE	Self Reported:	NO
Status Code & Date:	RESOLVED, 12/15/2006	Immunity Granted:	NO
Compliance Plan Requested:	NO	Repeat Violation:	NO
Cat & Sub Cat Code:	C, C7	EPA Class:	N/A
Viol Start Dt:	10/06/2005	Refer to Investigation:	YES
Viol End Dt:	10/06/2005	Compliance Due Date:	01/15/2007

Viol Comment: Title 30 Part 1, Chapter 305, Subchapter F, Rule 305.125, (1)
(1) The permittee has a duty to comply with all permit conditions. Failure to comply with any permit condition is a violation of the permit and statutes under which it was issued and is grounds for enforcement action, for permit amendment, revocation or suspension, or for denial of a permit renewal application or an application for a permit for another facility.

TPDES Permit No. WQ0002436-010; Effluent Limitations & Monitoring Requirements; No. 2; page 2g. The permittee shall maintain the pH not to be less 6.SU nor greater than 9.0 SU.

Citation(s): PERMIT TPDES Permit No. WQ0002436-010 Effluent Limitations & Monitoring Requirements; No. 2; page 2g.
The permittee shall maintain the p
30 TAC Chapter 305.125(1)

Principal: FORMOSA PLASTICS CORPORATION TEXAS
Program: WASTEWATER
Track #: 261681

Classification:	MINOR	Self Reported:	NO
Status Code & Date:	RESOLVED, 12/15/2006	Immunity Granted:	NO
Compliance Plan Requested:	NO	Repeat Violation:	NO
Cat & Sub Cat Code:	C, C7	EPA Class:	N/A

Viol Start Dt:	07/22/2005	Refer to Investigation:	YES
Viol End Dt:	07/22/2005	Compliance Due Date:	01/15/2007

Investigation Notes Related to Potential Violations and/or Records Request

Regulated Entity/Site Name	Formosa Plastics Corp., Texas				**TCEQ Account No.**	TPDES Permit No. WQ00023436-000	
Investigation Type	CCI	**Contact Made In-House (Y/N)**	Y	**Purpose of Investigation**	Comprehensive Compliance Investigation		
Regulated Entity Contact	Kelly Long & David Hill			**Telephone No.**	361- 987-7463	**Date Contacted**	12/06/2006
Title	Env. Eng. / Env. Manager			**FAX No.**	(361) 987-2363	**Date FAX**	

NOTICE: The information provided in this Note is intended to provide clarity to issues that have arisen to the date of this Note during the above investigation and *does not represent agency findings related to violations*. Any potential or alleged violations discovered after the date of this Note will be communicated by telephone to the regulated entity representative prior to the issuance of a notice of violation or enforcement. Conclusions drawn from this investigation, including additional violations or potential violations discovered (if any) during the course of this investigation, will be documented in the final investigation report

Issue		**For Records Request, identify the necessary records, the company contact and date due to the agency. For Alleged and Potential Violation issues, include the rule in question with the clearly described potential problem. Other type of issues: fully describe.**	
No.	**Type[1]**	**Rule Citation**	**Description of Issue**
1	AV	WQ0002436-008; No.1; page 2	Failure to prevent an unpermitted discharge of cooling tower blow down water via outfall 008.). The incident was reported according to TCEQ Non-Compliance Notification Protocol & resolved.
2	AV	WQ0002436-008; No.1; page 2.	Failure to meet daily maximum discharge loading limit for total zinc at outfall 001. The incident was reported according to TCEQ Non-Compliance Notification Protocol & resolved.
3	AV	WQ0002436-001; No. 2; page 2a; & Other Requirements; No. 9 (a), (b), (c); page 14.	Failure to meet effluent limitation for pH maximum and duration at outfall 001. The incident was reported according to TCEQ Non-Compliance Notification Protocol & resolved.
4	AV	WQ0002436-010; No. 2; page 2g.	Failure to meet effluent limitation for pH maximum at outfall 010. The incident was reported according to TCEQ Non-Compliance Notification Protocol & resolved.
5	Add. Issue	N/A	During the investigation conducted October 26, 2006, Dock and Channel Marker 22 measurements were collected. The Dock measurement from the surface of the water to the bottom of the bay measured 2.3 feet. The Channel Marker 22 measurement from the surface of the water to the bottom of the bay measured 4.2 feet. The depth measurements have indicated a depth differential of 1.9 feet. According to FPC–TX personnel the diffuser is partially buried and is connected to a 36 inch pipe. The one foot depth requirement is the distance from the diffuser to the surface of the water. The exact location of the diffuser is needed to determine the depth in reference to the natural bottom of the bay. The installation of a staff gauge or automated water level device is needed to establish a station datum at Channel Marker 22 from which all subsequent recorded water levels can be referenced. The permit requires daily water level measurements by a staff gauge or automated water level device.

Issue		For Records Request, identify the necessary records, the company contact and date due to the agency. For Alleged and Potential Violation issues, include the rule in question with the clearly described potential problem. Other type of issues: fully describe.	
No.	Type[1]	Rule Citation	Description of Issue
6	Add. Issue	N/A	An inspection of the Lavaca Bay Diffuser was conducted on November 9, 2005. The inspection report indicated the conditions of the diffuser as functional and flowing. However, there are concerns regarding excessive sediment, debris, and marine growth on the exterior concrete and cages around the nozzles. The diver recommended the diffuser be cleaned so that a proper inspection can be conducted.

Note 1: Issue Type Can Be One or More of: AV (Alleged Violation), PV (Potential Violation), O (Other), or RR (Records Request)

Document Acknowledgment. Signature on this document establishes only that the regulated entity (company) representative received a copy of this document and associated continuation pages on the date noted. If contact was made by telephone, document will be faxed to regulated entity; therefore, signature not required.

Ramon G. Juarez	12/6/2006	David Hill	12/7/06
Investigator Name (Signed &Printed)	**Date**	**Regulated Entity Representative Name (Signed & Printed)**	**Date**

If you have questions about any information on this form, please contact your local TCEQ Regional Office.
Individuals are entitled to request and review their personal information that the agency gathers on its forms. They may also have any errors in their information corrected. To review such information, call 512/239-3282.

COPIES: Original: for Regulated Entity Representative, Copy: TCEQ
TCEQ- 20085 (08-20-03)

(Note: use additional pages as necessary) Page _2_ of _2___

Attachment No. 1

ATTACHMENT No. 2

INVESTIGATION SAMPLE RESULTS

Regulated Entity Name: Formosa Utility, LTD and Formosa Corporation, Texas
Authorization ID(s): TPDES Permit No. WQ0002436-000 / EPA I.D. No. TX0085570
Date of Investigation: October 26 and 27, 2006

Sampling Location & Parameter	Measured Value	Authorized Limit	Type Sample	COC ID No.	Primary Source of Wastewater or Waste
FIELD DATA					
Outfall 001					
FLOW MGD	5.95	N/A	Instantaneous	016182	
Cl^2 res mg/l	0.01	N/A		016182	
D. O. mg/l	5.98	2.0 min	Grab	016182	Re-mediated
pH SU	7.78	5.0 – 11.0	Grab	016182	Ground water
$T^{O}F$	86.0	N/A	Grab	016182	
LAB DATA					
C-BOD mg/l	6.7	41.0	Grab	016182	
COD mg/l	97.0	333.0	Grab	016182	
TOC mg/l	22.0	333.0	Grab	016182	Previously
TSS mg/l	10.0	115.0	Grab	016182	Monitored
NH^3 - N	<0.20	9.0	Grab	016182	Effluents
O & G mg/l	<5.0	15.0	Grab	016182	Via
Fecal Coliform	N/E	N/A	Grab	016182	Out falls
Cr tot mg/l	<0.020	0.14	Grab	016182	101
Hex Cr mg/l	<0.005	0.10	Grab	016182	&
Cu tot mg/l	0.011	0.15	Grab	016182	201
Pb tot mg/l	<0.005	0.24	Grab	016182	
Hg tot	<0.0020	0.01	Grab	016182	
Zn tot	<0.10	0.10	Grab	016182	

N/A: The daily average flow of effluent shall not exceed 9.7 million gallons per day (MGD); The daily maximum flow shall not exceed 15.1 MGD.

ATTACHMENT No. 3

INVESTIGATION SAMPLE RESULTS

Regulated Entity Name: Formosa Utility, LTD and Formosa Corporation, Texas
Authorization ID(s): TPDES Permit No. WQ0002436-000 / EPA I. D. No. TX0085570
Date of Investigation: October 26 and 27, 2006

Sampling Location & Parameter	Measured Value	Authorized Limit	Type Sample	COC ID No.	Primary Source of Wastewater or Waste
LAB DATA					
Outfall 001					
VOC's			Grab	016182	Re-mediated
Benzene	<0.005	0.04	Grab	016182	Ground water
1,2 - Dichloroethane	<0.005	0.07	Grab	016182	
Toluene	<0.005	0.03	Grab	016182	Previously
Trichlorethylene	N/E	0.02	Grab	016182	Monitored
Vinyl Chloride	<0.005	0.11	Grab	016182	Effluents
					Via
S-VOC's					Out falls
Phenol	<0.010	0.02	Grab	016182	101
2,3,7,8-TCDD Equivalents	N/E	28.7 ppq	Grab	016182	&
					201

TCEQ-0181 (12/6/2000)

ATTACHMENT No. 4

INVESTIGATION SAMPLE RESULTS

Regulated Entity Name: Formosa Utility, LTD and Formosa Corporation, Texas
Authorization ID(s): TPDES Permit No. WQ0002436-000 / EPA I. D. No. TX0085570
Date of Investigation: October 26 and 27, 2006

Sampling Location & Parameter	Measured Value	Authorized Limit	Type Sample	COC ID No.	Primary Source of Wastewater or Waste
FIELD DATA					
Outfall 101					
FLOW MGD	3.0	N/A	Instantaneous		
D. O. mg/l	5.79	N/A	Grab	016182	
pH SU	7.99	5.0 – 11.0	Grab	016182	
T ^{o} F	86.0	N/A	Grab	016182	Process
LAB DATA				016182	Wastewater,
BOD mg/l	15.0	90.0	Grab	016182	Equipment /
TSS mg/l	9.8	160.0	Grab		Facility
COD mg/l	70.0	350.0	Grab	016182	Wash down,
VOC's					Storm Water,
Acrylonitrile	< 0.050	0.310	Grab	016182	&
Benzene	< 0.005	0.174	Grab	016182	Utility
Carbon Tetrachloride	< 0.005	0.049	Grab	016182	Waste waters
Chlorbenzene	< 0.005	0.036	Grab	016182	
1,2-Dichloroethane	< 0.005	0.271	Grab	016182	
1,1,1-Trichlorethane	< 0.005	0.069	Grab	016182	
1,1-Dichlorethane	< 0.005	0.076	Grab	016182	
1,1,2-Trichloroethane	< 0.005	0.069	Grab	016182	
Chlorethane	< 0.005	0.344	Grab	016182	
Chlorform	< 0.005	0.059	Grab	016182	

N/A: The daily average flow of effluent shall not exceed 4.4 million gallons per day (MGD); The daily maximum flow shall not exceed 6.0 MGD.

TCEQ-0181 (12/6/2000)

ATTACHMENT No. 5

INVESTIGATION SAMPLE RESULTS

Regulated Entity Name: Formosa Utility, LTD and Formosa Corporation, Texas
Authorization ID(s): TPDES Permit No. WQ0002436-000 / EPA I. D. No. TX0085570
Date of Investigation: October 26 and 27, 2006

Sampling Location & Parameter	Measured Value	Authorized Limit	Type Sample	COC ID No.	Primary Source of Wastewater or Waste
LAB DATA					
Outfall 101					
VOC's continue...					
1,1-Dichloro-ethylene mg/l	N/E	0.032	Grab	016182	Treated
1,2-Trans-Dichlor ethylene mg/l	N/E	0.069	Grab	016182	Process
1,2- Dichloro propane mg/l	0.005	0.295	Grab	016182	Waste water,
1,3- Dichloro propylene mg/l	N/E	0.056	Grab	016182	Equipment /
Ethylbenzene mg/l	0.005	0.139	Grab	016182	Facility
Methylene Chloride mg/l	0.050	0.114	Grab	016182	Storm Water,
Methly Chloride mg/l	N/E	0.244			&
Toluene mg/l	0.005	0.103	Grab	016182	Utility
Vinyl Chloride mg/l	0.050	0.150	Grab	016182	Waste waters

TCEQ-0181 (12/6/2000)

ATTACHMENT No. 6

INVESTIGATION SAMPLE RESULTS

Regulated Entity Name: Formosa Utility, LTD and Formosa Corporation, Texas
Authorization ID(s): TPDES Permit No. WQ0002436-000 / EPA I. D. No. TX0085570
Date of Investigation: October 26 and 27, 2006

Sampling Location & Parameter	Measured Value	Authorized Limit	Type Sample	COC ID No.	Primary Source of Wastewater or Waste
LAB DATA					
Outfall 101					
S-VOC's cont...					
Acenaphene mg/l	0.010	0.076	Grab		
1,2,4-Trichloro benzene mg/l	0.010	0.180	Grab	016182	Treated
Hexa-chloro benzene mg/l	0.010	0.00098	Grab	016182	Process
Hexachloro Ethane mg/l	0.010	0.069	Grab	016182	Waste water,
2- Chloro phenol mg/l	0.010	0.126			Equipment /
1,2, - Dichloro benzene mg/l	0.010	0.209	Grab	016182	Facility
1,3-Dichloro benzene mg/l	0.010	0.056	Grab	016182	Storm Water,
1,4,-Dichloro benzene mg/l	0.010	0.036	Grab	016182	&
1,1-Dichloro ethylene mg/l	N/E	0.032	Grab	016182	Utility
1,2-trans-Dichlor ethylene mg/l	N/E	0.069	Grab		Waste waters
2-4-Dichloro phenol mg/l	0.010	0.144	Grab	016182	
1,3-Dichlor propylene mg/l	N/E	0.056	Grab	016182	

ATTACHMENT No. 7

INVESTIGATION SAMPLE RESULTS

Regulated Entity Name: Formosa Utility, LTD and Formosa Corporation, Texas
Authorization ID(s): TPDES Permit No. WQ0002436-000 / EPA I. D. No. TX0085570
Date of Investigation: October 26 and 27, 2006

Sampling Location & Parameter	Measured Value	Authorized Limit	Type Sample	COC ID No.	Primary Source of Wastewater or Waste
LAB DATA					
Outfall 101					
S -VOC's cont...					
2,4-Dimethyl phenol mg/ l	0.010	0.046	Grab	016182	
2,4-Dinitro Toluene mg/l	0.010	0.366	Grab	016182	
2,6-Dinitro toluene mg/l	0.010	0.822	Grab	016182	Treated
Flouranthene mg/l	0.010	0.087	Grab	016182	Process
Hexachloro- Butadiene mg/l	0.010	0.063	Grab	016182	Waste water,
Napthalene mg/l	0.010	0.076	Grab	016182	Equipment /
Nitrobenzene mg/l	0.010	0.087	Grab	016182	Facility
2-Nitrophenol mg/l	0.010	0.089	Grab	016182	Storm Water,
4 – Nitro phenol mg/l	0.050	0.159	Grab	016182	&
2,4-Dintrophenol mg/ l	0.050	0.158	Grab	016182	Utility
4,6-Dinitro-o-cresol mg/l	N/E	0.355	Grab	016182	
Phenol mg/l	0.010	0.033	Grab	016182	
Bis(2-ethylhexyl) phthalate mg/l	0.067	0.358	Grab	016182	

TCEQ-0181 (12/6/2000)

ATTACHMENT No. 8

INVESTIGATION SAMPLE RESULTS

Regulated Entity Name: Formosa Utility, LTD and Formosa Corporation, Texas
Authorization ID(s): TPDES Permit No. WQ0002436-000 / EPA I. D. No. TX0085570
Date of Investigation: October 26 and 27, 2006

Sampling Location & Parameter	Measured Value	Authorized Limit	Type Sample	COC ID No.	Primary Source of Wastewater or Waste
LAB DATA					
Outfall 101					
S-VOC's cont...					
Di-n-butyl phthalate mg/l	0.010	0.073	Grab	016182	
Dietyl phthalate mg/l	0.010	0.260	Grab	016182	Treated
Dimethyl phthalate mg/l	0.010	0.060	Grab	016182	Process
Benzo(a) anthrcene mg/l	0.010	0.076	Grab	016182	Waste water,
Benzo(a)pyrene mg/l	0.010	0.078	Grab	016182	Equipment /
3,4-Benzo fluoranthene mg/l	N/E	0.078	Grab	016182	Facility
Benzo(k)fluor Anthene mg/l	0.010	0.076	Grab	016182	Storm Water,
Chrysene mg/l	0.010	0.076	Grab	016182	&
Acenaphthylene mg/l	0.010	0.076	Grab	016182	Utility
Anthracene mg/l	0.010	0.076	Grab	016182	
Fluorene mg/l	0.010	0.076	Grab	016182	
Phenanthrene mg/l	0.010	0.076	Grab	016182	
Pyrene mg/l	0.010	0.086	Grab	016182	
Tetrachloro-ethylene mg/l	N/E	0.072	Grab	016182	
Trichloro ethylene mg/l	N/E	0.069	Grab	016182	

Attachment 9

Chain of Custody Record

2372

016182

Permit #: WQ0002436-000

(Do not fill in this shaded area if the facility information must be confidential)

Region:	Organization #:	PCA Code:	Program:	Sampler telephone number:
14	4214		WATER	(361) 825-3115

E-Mail ID: RJUAREZ@TCEQ.STATE.TX.US

Sampler: (signature) Ramon G. Juarez

Sampler: (please print clearly) RAMON G. JUAREZ

Lab ID Number	Sample ID	Date 2006	Time	# of Bottles	Grab/ Comp.	Matrix L,S,M,O,T	CL2	pH	Cond.	Analyses Requested	REMARKS
	-01/001	10/26	11:16AM	15	G	L	0.01	7.78	N/E	CBOD, COD, TOC, TSS, NH3-N & VOC and S-VOC O&G, HEX. Cr, Cr, Cu, Pb, Hg, ZN, TRIP BLK	
	-02/101	10/26	10:25pm	8	G	L	N/E	7.99	N/E	BOD, TSS, COD, VOC & S-VOC	
	-03/101	10/26	10:35	8	G	L	N/E	7.99	N/E	BOD, TSS, COD, VOC & S-VOC	
	-04/101	10/26	10:40	8	G	L	N/E	N/E	N/E	BOD, TSS, COD, VOC ~~VOC~~ ~~TRIP~~ ~~BLANK~~	& S-VOC
	-05/101	10/26	10:45	3	G	L	N/E	N/E	N/E	VOC TRIP BLANK	
	-06										
	-07										
	-08										
	-09										
	-10										

Relinquished by:	Date 2006	Time	Received by:
Ramon G. Juarez	10/26	4:33pm	M McCowen
Relinquished by:	Date	Time	Received by:
Relinquished by:	Date	Time	Received by:
Relinquished by:	Date	Time	Received by:

Shipper name: RAMON G. JUAREZ

Shipper Number: TCEQ R14 - Corpus Christi

For Laboratory Use: 0.4C 1.0C

Received on ice: (Y) N 0.4C 0.0C NOT FROZEN deg. C

Preservatives: (Y) N

COC Seal: Y (N)

Seals Intact: Y (N)

TCEQ-10065 (11/02) White (Original) -Lab Yellow-Lab Pink-Contract Lab Manager Goldenrod-Collector Copy

Attachment 10

MarSheila Stafford
Texas Commission on Env Quality / TCEQ
Field Operations Division (MC-174)
PO BOX 13087
Austin, TX 78711-3087

ı Number:	560-2372-1
Lab Sample Id:	560-2372-1
Client Matrix:	Water
Date Sampled:	10/26/2006 1116
Date Received:	10/26/2006 1633

Client Sample ID: 016182-01 001

	Result/Qualifier	Unit	RL	Method	Date Prepared	Date Analyzed	Dilution
GC/MS VOA							
Dichlorodifluoromethane	<5.0	ug/L	5.0	8260B	10/30/2006 1959	10/30/2006 1959	1.0
Chloromethane	<5.0	ug/L	5.0	8260B	10/30/2006 1959	10/30/2006 1959	1.0
Vinyl chloride	<5.0	ug/L	5.0	8260B	10/30/2006 1959	10/30/2006 1959	1.0
Bromomethane	<5.0	ug/L	5.0	8260B	10/30/2006 1959	10/30/2006 1959	1.0
Chloroethane	<5.0	ug/L	5.0	8260B	10/30/2006 1959	10/30/2006 1959	1.0
Trichlorofluoromethane	<5.0	ug/L	5.0	8260B	10/30/2006 1959	10/30/2006 1959	1.0
Ethyl ether	<5.0	ug/L	5.0	8260B	10/30/2006 1959	10/30/2006 1959	1.0
1,1-Dichloroethene	<5.0	ug/L	5.0	8260B	10/30/2006 1959	10/30/2006 1959	1.0
Carbon disulfide	130	ug/L	5.0	8260B	10/30/2006 1959	10/30/2006 1959	1.0
Iodomethane	<5.0	ug/L	5.0	8260B	10/30/2006 1959	10/30/2006 1959	1.0
Acrolein	<50	ug/L	50	8260B	10/30/2006 1959	10/30/2006 1959	1.0
Methylene Chloride	<50	ug/L	50	8260B	10/30/2006 1959	10/30/2006 1959	1.0
Acetone	<100	ug/L	100	8260B	10/30/2006 1959	10/30/2006 1959	1.0
trans-1,2-Dichloroethene	<5.0	ug/L	5.0	8260B	10/30/2006 1959	10/30/2006 1959	1.0
Methyl tert-butyl ether	<5.0	ug/L	5.0	8260B	10/30/2006 1959	10/30/2006 1959	1.0
Acetonitrile	<50	ug/L	50	8260B	10/30/2006 1959	10/30/2006 1959	1.0
1,1-Dichloroethane	<5.0	ug/L	5.0	8260B	10/30/2006 1959	10/30/2006 1959	1.0
Acrylonitrile	<50	ug/L	50	8260B	10/30/2006 1959	10/30/2006 1959	1.0
Vinyl acetate	<5.0	ug/L	5.0	8260B	10/30/2006 1959	10/30/2006 1959	1.0
cis-1,2-Dichloroethene	<5.0	ug/L	5.0	8260B	10/30/2006 1959	10/30/2006 1959	1.0
2,2-Dichloropropane	<5.0	ug/L	5.0	8260B	10/30/2006 1959	10/30/2006 1959	1.0
Chloroform	14	ug/L	5.0	8260B	10/30/2006 1959	10/30/2006 1959	1.0
Ethyl acetate	<5.0	ug/L	5.0	8260B	10/30/2006 1959	10/30/2006 1959	1.0
Carbon tetrachloride	<5.0	ug/L	5.0	8260B	10/30/2006 1959	10/30/2006 1959	1.0
1,1,1-Trichloroethane	<5.0	ug/L	5.0	8260B	10/30/2006 1959	10/30/2006 1959	1.0
1,1-Dichloropropene	<5.0	ug/L	5.0	8260B	10/30/2006 1959	10/30/2006 1959	1.0
Benzene	<5.0	ug/L	5.0	8260B	10/30/2006 1959	10/30/2006 1959	1.0
1,2-Dichloroethane	<5.0	ug/L	5.0	8260B	10/30/2006 1959	10/30/2006 1959	1.0
Trichloroethene	<5.0	ug/L	5.0	8260B	10/30/2006 1959	10/30/2006 1959	1.0
Dibromomethane	<5.0	ug/L	5.0	8260B	10/30/2006 1959	10/30/2006 1959	1.0
1,2-Dichloropropane	<5.0	ug/L	5.0	8260B	10/30/2006 1959	10/30/2006 1959	1.0
Dichlorobromomethane	<5.0	ug/L	5.0	8260B	10/30/2006 1959	10/30/2006 1959	1.0

Attachment 11

MarSheila Stafford
Texas Commission on Env Quality / TCEQ
Field Operations Division (MC-174)
PO BOX 13087
Austin, TX 78711-3087

Job Number: 560-2372-1
Lab Sample Id: 560-2372-1
Client Matrix: Water
Date Sampled: 10/26/2006 1116
Date Received: 10/26/2006 1633

Client Sample ID: 016182-01 001

	Result/Qualifier	Unit	RL	Method	Date Prepared	Date Analyzed	Dilution
GC/MS VOA							
Methyl methacrylate	<5.0	ug/L	5.0	8260B	10/30/2006 1959	10/30/2006 1959	1.0
1,4-Dioxane	190	ug/L	100	8260B	10/30/2006 1959	10/30/2006 1959	1.0
cis-1,3-Dichloropropene	<5.0	ug/L	5.0	8260B	10/30/2006 1959	10/30/2006 1959	1.0
Toluene	<5.0	ug/L	5.0	8260B	10/30/2006 1959	10/30/2006 1959	1.0
2-Nitropropane	<5.0	ug/L	5.0	8260B	10/30/2006 1959	10/30/2006 1959	1.0
methyl isobutyl ketone	<5.0	ug/L	5.0	8260B	10/30/2006 1959	10/30/2006 1959	1.0
trans-1,3-Dichloropropene	<5.0	ug/L	5.0	8260B	10/30/2006 1959	10/30/2006 1959	1.0
Tetrachloroethene	<5.0	ug/L	5.0	8260B	10/30/2006 1959	10/30/2006 1959	1.0
Ethyl methacrylate	<5.0	ug/L	5.0	8260B	10/30/2006 1959	10/30/2006 1959	1.0
1,1,2-Trichloroethane	<5.0	ug/L	5.0	8260B	10/30/2006 1959	10/30/2006 1959	1.0
Chlorodibromomethane	<5.0	ug/L	5.0	8260B	10/30/2006 1959	10/30/2006 1959	1.0
1,3-Dichloropropane	<5.0	ug/L	5.0	8260B	10/30/2006 1959	10/30/2006 1959	1.0
Ethylene Dibromide	<5.0	ug/L	5.0	8260B	10/30/2006 1959	10/30/2006 1959	1.0
2-Hexanone	<5.0	ug/L	5.0	8260B	10/30/2006 1959	10/30/2006 1959	1.0
Chlorobenzene	<5.0	ug/L	5.0	8260B	10/30/2006 1959	10/30/2006 1959	1.0
Ethylbenzene	<5.0	ug/L	5.0	8260B	10/30/2006 1959	10/30/2006 1959	1.0
Bromoform	<5.0	ug/L	5.0	8260B	10/30/2006 1959	10/30/2006 1959	1.0
Styrene	<5.0	ug/L	5.0	8260B	10/30/2006 1959	10/30/2006 1959	1.0
1,1,2,2-Tetrachloroethane	<5.0	ug/L	5.0	8260B	10/30/2006 1959	10/30/2006 1959	1.0
1,2,3-Trichloropropane	<5.0	ug/L	5.0	8260B	10/30/2006 1959	10/30/2006 1959	1.0
1,3,5-Trimethylbenzene	<5.0	ug/L	5.0	8260B	10/30/2006 1959	10/30/2006 1959	1.0
1,2,4-Trimethylbenzene	<5.0	ug/L	5.0	8260B	10/30/2006 1959	10/30/2006 1959	1.0
1,2,3-Trichlorobenzene	<5.0	ug/L	5.0	8260B	10/30/2006 1959	10/30/2006 1959	1.0
Methyl Ethyl Ketone	<5.0	ug/L	5.0	8260B	10/30/2006 1959	10/30/2006 1959	1.0
1,1,2-Trichloro-1,2,2-trifluoroethane	<5.0	ug/L	5.0	8260B	10/30/2006 1959	10/30/2006 1959	1.0
Xylenes, Total	<15	ug/L	15	8260B	10/30/2006 1959	10/30/2006 1959	1.0
Surrogate					Acceptance Limits		
Dibromofluoromethane (Surr)	99	%		8260B	80 - 120		
1,2-Dichloroethane-d4 (Surr)	102	%		8260B	70 - 120		
Toluene-d8 (Surr)	99	%		8260B	80 - 120		
4-Bromofluorobenzene (Surr)	94	%		8260B	75 - 120		

MarSheila Stafford
Texas Commission on Env Quality / TCEQ
Field Operations Division (MC-174)
PO BOX 13087
Austin, TX 78711-3087

Attachment 12

Job Number: 560-2372-1
Lab Sample Id: 560-2372-1
Client Matrix: Water
Date Sampled: 10/26/2006 1116
Date Received: 10/26/2006 1633

Client Sample ID: 016182-01 001

	Result/Qualifier	Unit	RL	Method	Date Prepared	Date Analyzed	Dilution
GC/MS SEMI VOA							
Phenol	<10	ug/L	10	8270C	11/01/2006 1130	11/02/2006 1919	1.0
Bis(2-chloroethyl)ether	<10	ug/L	10	8270C	11/01/2006 1130	11/02/2006 1919	1.0
2-Chlorophenol	<10	ug/L	10	8270C	11/01/2006 1130	11/02/2006 1919	1.0
1,3-Dichlorobenzene	<10	ug/L	10	8270C	11/01/2006 1130	11/02/2006 1919	1.0
1,4-Dichlorobenzene	<10	ug/L	10	8270C	11/01/2006 1130	11/02/2006 1919	1.0
Benzyl alcohol	<20	ug/L	20	8270C	11/01/2006 1130	11/02/2006 1919	1.0
1,2-Dichlorobenzene	<10	ug/L	10	8270C	11/01/2006 1130	11/02/2006 1919	1.0
2-Methylphenol	<10	ug/L	10	8270C	11/01/2006 1130	11/02/2006 1919	1.0
Bis(2-chloroisopropyl) ether	<10	ug/L	10	8270C	11/01/2006 1130	11/02/2006 1919	1.0
3 & 4 Methylphenol	<10	ug/L	10	8270C	11/01/2006 1130	11/02/2006 1919	1.0
N-Nitrosodi-n-propylamine	<10	ug/L	10	8270C	11/01/2006 1130	11/02/2006 1919	1.0
Hexachloroethane	<10	ug/L	10	8270C	11/01/2006 1130	11/02/2006 1919	1.0
Nitrobenzene	<10	ug/L	10	8270C	11/01/2006 1130	11/02/2006 1919	1.0
Isophorone	<10	ug/L	10	8270C	11/01/2006 1130	11/02/2006 1919	1.0
2-Nitrophenol	<10	ug/L	10	8270C	11/01/2006 1130	11/02/2006 1919	1.0
2,4-Dimethylphenol	<10	ug/L	10	8270C	11/01/2006 1130	11/02/2006 1919	1.0
Bis(2-chloroethoxy)methane	<10	ug/L	10	8270C	11/01/2006 1130	11/02/2006 1919	1.0
2,4-Dichlorophenol	<10	ug/L	10	8270C	11/01/2006 1130	11/02/2006 1919	1.0
1,2,4-Trichlorobenzene	<10	ug/L	10	8270C	11/01/2006 1130	11/02/2006 1919	1.0
Naphthalene	<10	ug/L	10	8270C	11/01/2006 1130	11/02/2006 1919	1.0
4-Chloroaniline	<10	ug/L	10	8270C	11/01/2006 1130	11/02/2006 1919	1.0
Hexachlorobutadiene	<10	ug/L	10	8270C	11/01/2006 1130	11/02/2006 1919	1.0
4-Chloro-3-methylphenol	<10	ug/L	10	8270C	11/01/2006 1130	11/02/2006 1919	1.0
2-Methylnaphthalene	<10	ug/L	10	8270C	11/01/2006 1130	11/02/2006 1919	1.0
Hexachlorocyclopentadiene	<50	ug/L	50	8270C	11/01/2006 1130	11/02/2006 1919	1.0
2,4,6-Trichlorophenol	<10	ug/L	10	8270C	11/01/2006 1130	11/02/2006 1919	1.0
2,4,5-Trichlorophenol	<10	ug/L	10	8270C	11/01/2006 1130	11/02/2006 1919	1.0
2-Chloronaphthalene	<10	ug/L	10	8270C	11/01/2006 1130	11/02/2006 1919	1.0
2-Nitroaniline	<50	ug/L	50	8270C	11/01/2006 1130	11/02/2006 1919	1.0
Dimethyl phthalate	<10	ug/L	10	8270C	11/01/2006 1130	11/02/2006 1919	1.0
Acenaphthylene	<10	ug/L	10	8270C	11/01/2006 1130	11/02/2006 1919	1.0
2,6-Dinitrotoluene	<10	ug/L	10	8270C	11/01/2006 1130	11/02/2006 1919	1.0

Attachment 13

MarSheila Stafford
Texas Commission on Env Quality / TCEQ
Field Operations Division (MC-174)
PO BOX 13087
Austin, TX 78711-3087

Job Number: 560-2372-1
Lab Sample Id: 560-2372-1
Client Matrix: Water
Date Sampled: 10/26/2006 1116
Date Received: 10/26/2006 1633

Client Sample ID: 016182-01 001

	Result/Qualifier	Unit	RL	Method	Date Prepared	Date Analyzed	Dilution
GC/MS SEMI VOA							
3-Nitroaniline	<50	ug/L	50	8270C	11/01/2006 1130	11/02/2006 1919	1.0
Acenaphthene	<10	ug/L	10	8270C	11/01/2006 1130	11/02/2006 1919	1.0
2,4-Dinitrophenol	<50	ug/L	50	8270C	11/01/2006 1130	11/02/2006 1919	1.0
4-Nitrophenol	<50	ug/L	50	8270C	11/01/2006 1130	11/02/2006 1919	1.0
Dibenzofuran	<10	ug/L	10	8270C	11/01/2006 1130	11/02/2006 1919	1.0
2,4-Dinitrotoluene	<10	ug/L	10	8270C	11/01/2006 1130	11/02/2006 1919	1.0
Diethyl phthalate	<10	ug/L	10	8270C	11/01/2006 1130	11/02/2006 1919	1.0
Fluorene	<10	ug/L	10	8270C	11/01/2006 1130	11/02/2006 1919	1.0
4-Chlorophenyl phenyl ether	<10	ug/L	10	8270C	11/01/2006 1130	11/02/2006 1919	1.0
4-Nitroaniline	<50	ug/L	50	8270C	11/01/2006 1130	11/02/2006 1919	1.0
4,6-Dinitro-2-methylphenol	<50	ug/L	50	8270C	11/01/2006 1130	11/02/2006 1919	1.0
N-Nitrosodiphenylamine	<10	ug/L	10	8270C	11/01/2006 1130	11/02/2006 1919	1.0
4-Bromophenyl phenyl ether	<10	ug/L	10	8270C	11/01/2006 1130	11/02/2006 1919	1.0
Hexachlorobenzene	<10	ug/L	10	8270C	11/01/2006 1130	11/02/2006 1919	1.0
Phenanthrene	<10	ug/L	10	8270C	11/01/2006 1130	11/02/2006 1919	1.0
Anthracene	<10	ug/L	10	8270C	11/01/2006 1130	11/02/2006 1919	1.0
Di-n-butyl phthalate	<10	ug/L	10	8270C	11/01/2006 1130	11/02/2006 1919	1.0
Fluoranthene	<10	ug/L	10	8270C	11/01/2006 1130	11/02/2006 1919	1.0
Pyrene	<10	ug/L	10	8270C	11/01/2006 1130	11/02/2006 1919	1.0
Butyl benzyl phthalate	<10	ug/L	10	8270C	11/01/2006 1130	11/02/2006 1919	1.0
Benzo[a]anthracene	<10	ug/L	10	8270C	11/01/2006 1130	11/02/2006 1919	1.0
Chrysene	<10	ug/L	10	8270C	11/01/2006 1130	11/02/2006 1919	1.0
Bis(2-ethylhexyl) phthalate	<10	ug/L	10	8270C	11/01/2006 1130	11/02/2006 1919	1.0
Di-n-octyl phthalate	<10	ug/L	10	8270C	11/01/2006 1130	11/02/2006 1919	1.0
Benzo[b]fluoranthene	<10	ug/L	10	8270C	11/01/2006 1130	11/02/2006 1919	1.0
Benzo[k]fluoranthene	<10	ug/L	10	8270C	11/01/2006 1130	11/02/2006 1919	1.0
Benzo[a]pyrene	<10	ug/L	10	8270C	11/01/2006 1130	11/02/2006 1919	1.0
Indeno[1,2,3-cd]pyrene	<10	ug/L	10	8270C	11/01/2006 1130	11/02/2006 1919	1.0
Dibenz(a,h)anthracene	<10	ug/L	10	8270C	11/01/2006 1130	11/02/2006 1919	1.0
Benzo[g,h,i]perylene	<10	ug/L	10	8270C	11/01/2006 1130	11/02/2006 1919	1.0
3,3'-Dichlorobenzidine	<20	ug/L	20	8270C	11/01/2006 1130	11/02/2006 1919	1.0
Pentachlorophenol	<50	ug/L	50	8270C	11/01/2006 1130	11/02/2006 1919	1.0

MarSheila Stafford
Texas Commission on Env Quality / TCEQ
Field Operations Division (MC-174)
PO BOX 13087
Austin, TX 78711-3087

Attachment 14

Job Number: 560-2372-1
Lab Sample Id: 560-2372-1
Client Matrix: Water
Date Sampled: 10/26/2006 1116
Date Received: 10/26/2006 1633

Client Sample ID: 016182-01 001

	Result/Qualifier		Unit	RL	Method	Date Prepared	Date Analyzed	Dilution
GC/MS SEMI VOA								
Surrogate						Acceptance Limits		
2-Fluorophenol	43		%		8270C	10 - 120		
Phenol-d5	46		%		8270C	12 - 120		
Nitrobenzene-d5	69		%		8270C	30 - 120		
2-Fluorobiphenyl	64		%		8270C	26 - 120		
2,4,6-Tribromophenol	57		%		8270C	25 - 120		
Terphenyl-d14	28		%		8270C	10 - 120		
METALS								
Cr	<0.020		mg/L	0.020	6020	11/09/2006 1524	11/09/2006 2025	10
Pb	<0.0050		mg/L	0.0050	6020	11/09/2006 1524	11/09/2006 2025	10
Cu	0.011	B	mg/L	0.0050	6020	11/09/2006 1524	11/09/2006 2025	10
Zn	<0.10		mg/L	0.10	6020	11/09/2006 1524	11/09/2006 2025	10
Chromium, hexavalent	<0.0050		mg/L	0.0050	7197		10/27/2006 0930	1.0
Hg	<0.0020		mg/L	0.0020	7470A	10/30/2006 0930	10/30/2006 1306	1.0
GENERAL CHEMISTRY								
Total Suspended Solids	10		mg/L	4.0	160.2		11/01/2006 1630	1.0
HEM (Oil and Grease)	<5.0		mg/L	5.0	1664A	10/31/2006 1000	10/31/2006 1000	1.0
Ammonia	<0.20		mg/L	0.20	350.1	11/08/2006 1430	11/08/2006 1700	1.0
Total Organic Carbon	22		mg/L	1.0	415.1		11/02/2006 1700	1.0
Carbonaceous Biochemical Oxygen	6.7		mg/L	3.0	5210B		10/27/2006 1610	1.0
Chemical Oxygen Demand	97		mg/L	40	8000	10/30/2006 1230	10/30/2006 1230	1.0

Attachment 15

MarSheila Stafford
Texas Commission on Env Quality / TCEQ
Field Operations Division (MC-174)
PO BOX 13087
Austin, TX 78711-3087

Job Number: 560-2372-1
Lab Sample Id: 560-2372-2
Client Matrix: Water
Date Sampled: 10/26/2006 1025
Date Received: 10/26/2006 1633

Client Sample ID: 016182-02 101

	Result/Qualifier	Unit	RL	Method	Date Prepared	Date Analyzed	Dilution
GC/MS VOA							
Dichlorodifluoromethane	<5.0	ug/L	5.0	8260B	10/30/2006 2300	10/30/2006 2300	1.0
Chloromethane	<5.0	ug/L	5.0	8260B	10/30/2006 2300	10/30/2006 2300	1.0
Vinyl chloride	<5.0	ug/L	5.0	8260B	10/30/2006 2300	10/30/2006 2300	1.0
Bromomethane	<5.0	ug/L	5.0	8260B	10/30/2006 2300	10/30/2006 2300	1.0
Chloroethane	<5.0	ug/L	5.0	8260B	10/30/2006 2300	10/30/2006 2300	1.0
Trichlorofluoromethane	<5.0	ug/L	5.0	8260B	10/30/2006 2300	10/30/2006 2300	1.0
Ethyl ether	<5.0	ug/L	5.0	8260B	10/30/2006 2300	10/30/2006 2300	1.0
1,1-Dichloroethene	<5.0	ug/L	5.0	8260B	10/30/2006 2300	10/30/2006 2300	1.0
Carbon disulfide	140	ug/L	5.0	8260B	10/30/2006 2300	10/30/2006 2300	1.0
Iodomethane	<5.0	ug/L	5.0	8260B	10/30/2006 2300	10/30/2006 2300	1.0
Acrolein	<50	ug/L	50	8260B	10/30/2006 2300	10/30/2006 2300	1.0
Methylene Chloride	<50	ug/L	50	8260B	10/30/2006 2300	10/30/2006 2300	1.0
Acetone	<100	ug/L	100	8260B	10/30/2006 2300	10/30/2006 2300	1.0
trans-1,2-Dichloroethene	<5.0	ug/L	5.0	8260B	10/30/2006 2300	10/30/2006 2300	1.0
Methyl tert-butyl ether	<5.0	ug/L	5.0	8260B	10/30/2006 2300	10/30/2006 2300	1.0
Acetonitrile	<50	ug/L	50	8260B	10/30/2006 2300	10/30/2006 2300	1.0
1,1-Dichloroethane	<5.0	ug/L	5.0	8260B	10/30/2006 2300	10/30/2006 2300	1.0
Acrylonitrile	<50	ug/L	50	8260B	10/30/2006 2300	10/30/2006 2300	1.0
Vinyl acetate	<5.0	ug/L	5.0	8260B	10/30/2006 2300	10/30/2006 2300	1.0
cis-1,2-Dichloroethene	<5.0	ug/L	5.0	8260B	10/30/2006 2300	10/30/2006 2300	1.0
2,2-Dichloropropane	<5.0	ug/L	5.0	8260B	10/30/2006 2300	10/30/2006 2300	1.0
Chloroform	<5.0	ug/L	5.0	8260B	10/30/2006 2300	10/30/2006 2300	1.0
Ethyl acetate	<5.0	ug/L	5.0	8260B	10/30/2006 2300	10/30/2006 2300	1.0
Carbon tetrachloride	<5.0	ug/L	5.0	8260B	10/30/2006 2300	10/30/2006 2300	1.0
1,1,1-Trichloroethane	<5.0	ug/L	5.0	8260B	10/30/2006 2300	10/30/2006 2300	1.0
1,1-Dichloropropene	<5.0	ug/L	5.0	8260B	10/30/2006 2300	10/30/2006 2300	1.0
Benzene	<5.0	ug/L	5.0	8260B	10/30/2006 2300	10/30/2006 2300	1.0
1,2-Dichloroethane	<5.0	ug/L	5.0	8260B	10/30/2006 2300	10/30/2006 2300	1.0
Trichloroethene	<5.0	ug/L	5.0	8260B	10/30/2006 2300	10/30/2006 2300	1.0
Dibromomethane	<5.0	ug/L	5.0	8260B	10/30/2006 2300	10/30/2006 2300	1.0
1,2-Dichloropropane	<5.0	ug/L	5.0	8260B	10/30/2006 2300	10/30/2006 2300	1.0
Dichlorobromomethane	<5.0	ug/L	5.0	8260B	10/30/2006 2300	10/30/2006 2300	1.0

Attachment 16

MarSheila Stafford
Texas Commission on Env Quality / TCEQ
Field Operations Division (MC-174)
PO BOX 13087
Austin, TX 78711-3087

Job Number: 560-2372-1
Lab Sample Id: 560-2372-2
Client Matrix: Water
Date Sampled: 10/26/2006 1025
Date Received: 10/26/2006 1633

Client Sample ID: 016182-02 101

	Result/Qualifier	Unit	RL	Method	Date Prepared	Date Analyzed	Dilution
GC/MS VOA							
Methyl methacrylate	<5.0	ug/L	5.0	8260B	10/30/2006 2300	10/30/2006 2300	1.0
1,4-Dioxane	220	ug/L	100	8260B	10/30/2006 2300	10/30/2006 2300	1.0
cis-1,3-Dichloropropene	<5.0	ug/L	5.0	8260B	10/30/2006 2300	10/30/2006 2300	1.0
Toluene	<5.0	ug/L	5.0	8260B	10/30/2006 2300	10/30/2006 2300	1.0
2-Nitropropane	<5.0	ug/L	5.0	8260B	10/30/2006 2300	10/30/2006 2300	1.0
methyl isobutyl ketone	<5.0	ug/L	5.0	8260B	10/30/2006 2300	10/30/2006 2300	1.0
trans-1,3-Dichloropropene	<5.0	ug/L	5.0	8260B	10/30/2006 2300	10/30/2006 2300	1.0
Tetrachloroethene	<5.0	ug/L	5.0	8260B	10/30/2006 2300	10/30/2006 2300	1.0
Ethyl methacrylate	<5.0	ug/L	5.0	8260B	10/30/2006 2300	10/30/2006 2300	1.0
1,1,2-Trichloroethane	<5.0	ug/L	5.0	8260B	10/30/2006 2300	10/30/2006 2300	1.0
Chlorodibromomethane	<5.0	ug/L	5.0	8260B	10/30/2006 2300	10/30/2006 2300	1.0
1,3-Dichloropropane	<5.0	ug/L	5.0	8260B	10/30/2006 2300	10/30/2006 2300	1.0
Ethylene Dibromide	<5.0	ug/L	5.0	8260B	10/30/2006 2300	10/30/2006 2300	1.0
2-Hexanone	<5.0	ug/L	5.0	8260B	10/30/2006 2300	10/30/2006 2300	1.0
Chlorobenzene	<5.0	ug/L	5.0	8260B	10/30/2006 2300	10/30/2006 2300	1.0
Ethylbenzene	<5.0	ug/L	5.0	8260B	10/30/2006 2300	10/30/2006 2300	1.0
Bromoform	<5.0	ug/L	5.0	8260B	10/30/2006 2300	10/30/2006 2300	1.0
Styrene	<5.0	ug/L	5.0	8260B	10/30/2006 2300	10/30/2006 2300	1.0
1,1,2,2-Tetrachloroethane	<5.0	ug/L	5.0	8260B	10/30/2006 2300	10/30/2006 2300	1.0
1,2,3-Trichloropropane	<5.0	ug/L	5.0	8260B	10/30/2006 2300	10/30/2006 2300	1.0
1,3,5-Trimethylbenzene	<5.0	ug/L	5.0	8260B	10/30/2006 2300	10/30/2006 2300	1.0
1,2,4-Trimethylbenzene	<5.0	ug/L	5.0	8260B	10/30/2006 2300	10/30/2006 2300	1.0
1,2,3-Trichlorobenzene	<5.0	ug/L	5.0	8260B	10/30/2006 2300	10/30/2006 2300	1.0
Methyl Ethyl Ketone	<5.0	ug/L	5.0	8260B	10/30/2006 2300	10/30/2006 2300	1.0
1,1,2-Trichloro-1,2,2-trifluoroethane	<5.0	ug/L	5.0	8260B	10/30/2006 2300	10/30/2006 2300	1.0
Xylenes, Total	<15	ug/L	15	8260B	10/30/2006 2300	10/30/2006 2300	1.0
Surrogate					Acceptance Limits		
Dibromofluoromethane (Surr)	100	%		8260B	80 - 120		
1,2-Dichloroethane-d4 (Surr)	101	%		8260B	70 - 120		
Toluene-d8 (Surr)	100	%		8260B	80 - 120		
4-Bromofluorobenzene (Surr)	95	%		8260B	75 - 120		

Attachment No. 17

MarSheila Stafford
Texas Commission on Env Quality / TCEQ
Field Operations Division (MC-174)
PO BOX 13087
Austin, TX 78711-3087

›b Number: 560-2372-1
_ab Sample Id: 560-2372-2
Client Matrix: Water
Date Sampled: 10/26/2006 1025
Date Received: 10/26/2006 1633

Client Sample ID: 016182-02 101

GC/MS SEMI VOA	Result/Qualifier	Unit	RL	Method	Date Prepared	Date Analyzed	Dilution
Phenol	<10	ug/L	10	8270C	11/01/2006 1130	11/02/2006 1947	1.0
Bis(2-chloroethyl)ether	<10	ug/L	10	8270C	11/01/2006 1130	11/02/2006 1947	1.0
2-Chlorophenol	<10	ug/L	10	8270C	11/01/2006 1130	11/02/2006 1947	1.0
1,3-Dichlorobenzene	<10	ug/L	10	8270C	11/01/2006 1130	11/02/2006 1947	1.0
1,4-Dichlorobenzene	<10	ug/L	10	8270C	11/01/2006 1130	11/02/2006 1947	1.0
Benzyl alcohol	<20	ug/L	20	8270C	11/01/2006 1130	11/02/2006 1947	1.0
1,2-Dichlorobenzene	<10	ug/L	10	8270C	11/01/2006 1130	11/02/2006 1947	1.0
2-Methylphenol	<10	ug/L	10	8270C	11/01/2006 1130	11/02/2006 1947	1.0
Bis(2-chloroisopropyl) ether	<10	ug/L	10	8270C	11/01/2006 1130	11/02/2006 1947	1.0
3 & 4 Methylphenol	<10	ug/L	10	8270C	11/01/2006 1130	11/02/2006 1947	1.0
N-Nitrosodi-n-propylamine	<10	ug/L	10	8270C	11/01/2006 1130	11/02/2006 1947	1.0
Hexachloroethane	<10	ug/L	10	8270C	11/01/2006 1130	11/02/2006 1947	1.0
Nitrobenzene	<10	ug/L	10	8270C	11/01/2006 1130	11/02/2006 1947	1.0
Isophorone	<10	ug/L	10	8270C	11/01/2006 1130	11/02/2006 1947	1.0
2-Nitrophenol	<10	ug/L	10	8270C	11/01/2006 1130	11/02/2006 1947	1.0
2,4-Dimethylphenol	<10	ug/L	10	8270C	11/01/2006 1130	11/02/2006 1947	1.0
Bis(2-chloroethoxy)methane	<10	ug/L	10	8270C	11/01/2006 1130	11/02/2006 1947	1.0
2,4-Dichlorophenol	<10	ug/L	10	8270C	11/01/2006 1130	11/02/2006 1947	1.0
1,2,4-Trichlorobenzene	<10	ug/L	10	8270C	11/01/2006 1130	11/02/2006 1947	1.0
Naphthalene	<10	ug/L	10	8270C	11/01/2006 1130	11/02/2006 1947	1.0
4-Chloroaniline	<10	ug/L	10	8270C	11/01/2006 1130	11/02/2006 1947	1.0
Hexachlorobutadiene	<10	ug/L	10	8270C	11/01/2006 1130	11/02/2006 1947	1.0
4-Chloro-3-methylphenol	<10	ug/L	10	8270C	11/01/2006 1130	11/02/2006 1947	1.0
2-Methylnaphthalene	<10	ug/L	10	8270C	11/01/2006 1130	11/02/2006 1947	1.0
Hexachlorocyclopentadiene	<50	ug/L	50	8270C	11/01/2006 1130	11/02/2006 1947	1.0
2,4,6-Trichlorophenol	<10	ug/L	10	8270C	11/01/2006 1130	11/02/2006 1947	1.0
2,4,5-Trichlorophenol	<10	ug/L	10	8270C	11/01/2006 1130	11/02/2006 1947	1.0
2-Chloronaphthalene	<10	ug/L	10	8270C	11/01/2006 1130	11/02/2006 1947	1.0
2-Nitroaniline	<50	ug/L	50	8270C	11/01/2006 1130	11/02/2006 1947	1.0
Dimethyl phthalate	<10	ug/L	10	8270C	11/01/2006 1130	11/02/2006 1947	1.0
Acenaphthylene	<10	ug/L	10	8270C	11/01/2006 1130	11/02/2006 1947	1.0
2,6-Dinitrotoluene	<10	ug/L	10	8270C	11/01/2006 1130	11/02/2006 1947	1.0

Attach 18

MarSheila Stafford
Texas Commission on Env Quality / TCEQ
Field Operations Division (MC-174)
PO BOX 13087
Austin, TX 78711-3087

Job Number: 560-2372-1
Lab Sample Id: 560-2372-2
Client Matrix: Water
Date Sampled: 10/26/2006 1025
Date Received: 10/26/2006 1633

Client Sample ID: 016182-02 101

GC/MS SEMI VOA	Result/Qualifier	Unit	RL	Method	Date Prepared	Date Analyzed	Dilution
3-Nitroaniline	<50	ug/L	50	8270C	11/01/2006 1130	11/02/2006 1947	1.0
Acenaphthene	<10	ug/L	10	8270C	11/01/2006 1130	11/02/2006 1947	1.0
2,4-Dinitrophenol	<50	ug/L	50	8270C	11/01/2006 1130	11/02/2006 1947	1.0
4-Nitrophenol	<50	ug/L	50	8270C	11/01/2006 1130	11/02/2006 1947	1.0
Dibenzofuran	<10	ug/L	10	8270C	11/01/2006 1130	11/02/2006 1947	1.0
2,4-Dinitrotoluene	<10	ug/L	10	8270C	11/01/2006 1130	11/02/2006 1947	1.0
Diethyl phthalate	<10	ug/L	10	8270C	11/01/2006 1130	11/02/2006 1947	1.0
Fluorene	<10	ug/L	10	8270C	11/01/2006 1130	11/02/2006 1947	1.0
4-Chlorophenyl phenyl ether	<10	ug/L	10	8270C	11/01/2006 1130	11/02/2006 1947	1.0
4-Nitroaniline	<50	ug/L	50	8270C	11/01/2006 1130	11/02/2006 1947	1.0
4,6-Dinitro-2-methylphenol	<50	ug/L	50	8270C	11/01/2006 1130	11/02/2006 1947	1.0
N-Nitrosodiphenylamine	<10	ug/L	10	8270C	11/01/2006 1130	11/02/2006 1947	1.0
4-Bromophenyl phenyl ether	<10	ug/L	10	8270C	11/01/2006 1130	11/02/2006 1947	1.0
Hexachlorobenzene	<10	ug/L	10	8270C	11/01/2006 1130	11/02/2006 1947	1.0
Phenanthrene	<10	ug/L	10	8270C	11/01/2006 1130	11/02/2006 1947	1.0
Anthracene	<10	ug/L	10	8270C	11/01/2006 1130	11/02/2006 1947	1.0
Di-n-butyl phthalate	<10	ug/L	10	8270C	11/01/2006 1130	11/02/2006 1947	1.0
Fluoranthene	<10	ug/L	10	8270C	11/01/2006 1130	11/02/2006 1947	1.0
Pyrene	<10	ug/L	10	8270C	11/01/2006 1130	11/02/2006 1947	1.0
Butyl benzyl phthalate	<10	ug/L	10	8270C	11/01/2006 1130	11/02/2006 1947	1.0
Benzo[a]anthracene	<10	ug/L	10	8270C	11/01/2006 1130	11/02/2006 1947	1.0
Chrysene	<10	ug/L	10	8270C	11/01/2006 1130	11/02/2006 1947	1.0
Bis(2-ethylhexyl) phthalate	67	ug/L	10	8270C	11/01/2006 1130	11/02/2006 1947	1.0
Di-n-octyl phthalate	<10	ug/L	10	8270C	11/01/2006 1130	11/02/2006 1947	1.0
Benzo[b]fluoranthene	<10	ug/L	10	8270C	11/01/2006 1130	11/02/2006 1947	1.0
Benzo[k]fluoranthene	<10	ug/L	10	8270C	11/01/2006 1130	11/02/2006 1947	1.0
Benzo[a]pyrene	<10	ug/L	10	8270C	11/01/2006 1130	11/02/2006 1947	1.0
Indeno[1,2,3-cd]pyrene	<10	ug/L	10	8270C	11/01/2006 1130	11/02/2006 1947	1.0
Dibenz(a,h)anthracene	<10	ug/L	10	8270C	11/01/2006 1130	11/02/2006 1947	1.0
Benzo[g,h,i]perylene	<10	ug/L	10	8270C	11/01/2006 1130	11/02/2006 1947	1.0
3,3'-Dichlorobenzidine	<20	ug/L	20	8270C	11/01/2006 1130	11/02/2006 1947	1.0
Pentachlorophenol	<50	ug/L	50	8270C	11/01/2006 1130	11/02/2006 1947	1.0

Attachment No. 19

MarSheila Stafford
Texas Commission on Env Quality / TCEQ
Field Operations Division (MC-174)
PO BOX 13087
Austin, TX 78711-3087

Job Number: 560-2372-1
Lab Sample Id: 560-2372-2
Client Matrix: Water
Date Sampled: 10/26/2006 1025
Date Received: 10/26/2006 1633

Client Sample ID: 016182-02 101

	Result/Qualifier	Unit	RL	Method	Date Prepared	Date Analyzed	Dilution
GC/MS SEMI VOA							
Surrogate					Acceptance Limits		
2-Fluorophenol	41	%		8270C	10 - 120		
Phenol-d5	45	%		8270C	12 - 120		
Nitrobenzene-d5	66	%		8270C	30 - 120		
2-Fluorobiphenyl	60	%		8270C	26 - 120		
2,4,6-Tribromophenol	56	%		8270C	25 - 120		
Terphenyl-d14	29	%		8270C	10 - 120		
GENERAL CHEMISTRY							
Total Suspended Solids	9.8	mg/L	4.0	160.2		11/01/2006 1630	1.0
Biochemical Oxygen Demand	15	mg/L	3.0	405.1		10/27/2006 1500	1.0
Chemical Oxygen Demand	70	mg/L	40	8000	10/30/2006 1230	10/30/2006 1230	1.0

FORMOSA PLASTICS CORPORATION, TEXAS

ISO-9002 CERTIFIED
ISO-14001 CERTIFIED

P. O. BOX 700
201 FORMOSA DRIVE
POINT COMFORT, TX 77978

PHONE: 361-987-7000
FAX: 361-987-2363

July 28, 2006

ATTACH. 20

CERTIFIED MAIL: 7005-3110-0000-4885-6059

Mr. Sinoel Contreras
Water Section Manager, Region 14
Texas Commission on Environmental Quality
NRC Building, Suite 1200
6300 Ocean Drive, Unit 5839
Corpus Christi, Texas 78412-5839

RE: Formosa Plastics Corporation, Texas
TPDES Permit No. WQ0002436000
Customer Number: CN600130017
Regulated Entity Number: RN100218973
Unauthorized Discharge at Stormwater Outfall 008: Follow-up Letter

Dear Mr. Contreras:

This is a follow-up letter and revision to a letter previously sent on July 12, 2006. Formosa Plastics Corporation, Texas (FPC-TX), submitted the original letter to inform you of an unauthorized discharge that occurred on July 8, 2006, at permitted Stormwater Outfall 008. The discharge occurred when an underground water line containing cooling tower blow down water was broken during an excavation. The water from the line break, added to stormwater from a heavy rainfall event that fell the same day, caused the outfall gates to overflow. No outfall parameters were violated, but cooling tower blow down water is not authorized by the TPDES permit to be released through Outfall 008. It is important to note, that although we have assumed some cooling tower blowdown water was discharged, we can not be sure of the amount since the Outfall structure already contained a significant volume of rain water from the rain event that occurred that day. And much of the collected water was recovered.

Outfall 008:

Parameter:	Cooling tower blow down not permitted for discharge.
Date:	July 8, 2006
Time:	Approximately 1524 hrs.
Duration:	Estimate 13 hours

Anticipated Time Noncompliance Will Continue If Not Corrected:
Not Applicable.

ATTACH. 20

24 – Hour Oral Report:
Not required. No danger to human health, safety, or the environment.

Potential Danger to Human Health, Safety, or the Environment
None anticipated or experienced.

Background:
On the morning of July 8, 2006, a contractor at FPC-TX was excavating in the Utilities area when a track hoe struck and damaged an underground 8-inch cooling tower blow down pipeline. Steps were taken to isolate the pipeline and stop the flow of water, but due to the size of the line and pressure of the water a large amount was lost before the line could be completely isolated and drained down. This water entered the storm ditch system, which was already full due to heavy rains at the plant site the same day, and overflowed the outfall gate structure. Regular samples were taken and tested. The pH was 8.1 standards units (must be within the range of 6.0 to 9.0). The TOC was 11 mg/l (must be 55 mg/l or less). A combined discharge of stormwater and cooling tower blow down water was estimated to be about 140,000 gallons.

Immediate Steps Taken to Reduce, Eliminate and Prevent Reoccurrence of the Noncompliance and to Mitigate Its Adverse Effects
Pipeline was isolated and repaired. Vacuum trucks were called out to capture as much of the blow down water as possible for diversion to the treatment plant. An incident investigation was conducted.

Should you require additional information or assistance, please contact Kelly Long, at (361) 987-7463.

Sincerely,

R. P. Smith
Vice President/General Manager
Formosa Plastics Corporation, Texas

FORMOSA PLASTICS CORPORATION, TEXAS

ISO-9002 CERTIFIED
ISO-14001 CERTIFIED

P. O. BOX 700
201 FORMOSA DRIVE
POINT COMFORT, TX 77978

PHONE: 361-987-7000
FAX: 361-987-2363

June 9, 2006

CERTIFIED MAIL: 7003-3110-0005-6268-2488

ATTACH. 21

Mr. Sinoel Contreras
Water Section Manager, Region 14
Texas Commission on Environmental Quality
NRC Building, Suite 1200
6300 Ocean Drive, Unit 5839
Corpus Christi, Texas 78412-5839

COPY

RE: Formosa Plastics Corporation, Texas
TPDES Permit No. WQ0002436000
Customer Number: CN600130017
Regulated Entity Number: RN100218973
Zinc Noncompliance at Outfall 001

Dear Mr. Contreras:

Formosa Plastics Corporation, Texas, is submitting this letter to follow up our verbal notification of the zinc noncompliance that occurred at the FPC-TX permitted Outfall 001 on May 30, 2006. Initial discovery was made on Friday June 2, 2006, when the 24-hour composite sample taken on May 30th was tested for metals.

Outfall 001:

Parameter:	Daily maximum of 5.5 lbs/day of Total Zinc
Date:	May 30, 2006
Time:	24-hour composite
Duration:	24 hours
Noncompliance:	Zinc loading for May 30th was 9.28 lbs/day

Anticipated Time Noncompliance Will Continue If Not Corrected:
Not Applicable.

24 – Hour Oral Report:
David Kennebeck, TCEQ Region 14, was notified verbally, at 1620 hours on June 2, 2006.

Potential Danger to Human Health, Safety, or the Environment
None anticipated or experienced.

ATTACH 21

Background:

On May 29, 2006 the Plant site received a significant amount of rainfall. A total of about 4.5 inches of rain was received on that day, and rain continued to fall over the next several days. On this same day at approximately 2000 hours the Chlor-Alkali Unit experienced a hydrochloric acid tank failure. When the tank failed the contents of the tank emptied into a secondary containment dike. The acid within the dike leached zinc from galvanized metal within the immediate area. This resulted in zinc depositing in the wastewater when the containment area was cleaned out, which was ultimately sent to the Combined Water Treatment Plant (CWTP) for treatment prior to discharge.

Immediate Steps Taken to Reduce, Eliminate and Prevent Reoccurrence of the Noncompliance and to Mitigate Its Adverse Effects

On Monday night and Tuesday morning the CWTP began to see elevated concentrations of zinc in the Chlor-Alkali wastewater effluent. In response, the CWTP: 1) increased the injection rate of metals reducing polymer to the treatment train, and 2) restricted the wastewater flow rate from Chlor-Alkali, and 3) increased the sludge blowdown from the clarifier to start removing zinc from the treatment unit.

On Wednesday May 31st the zinc concentration from Chlor-Alkali increased. In response the CWTP: 1) shutdown the flow of incoming water from Chlor-Alkali, 2) reduced the flow from the treatment train to the final mixing sump, and 3) maintained a continuous blowdown from the clarifier.

On Thursday and Friday, June 1st and 2nd, respectively, we continued to operate in the same manner as above. The composite sample taken on Thursday June 1st still showed higher than normal zinc, but within specifications for the daily maximum. By Friday evening the zinc within the treatment train was reduced. On Friday night a limited flow of process wastewater from Chlor-Alkali was again initiated. CWTP has maintained the increased injection of the metals reducing polymer and the continuous blowdown on the clarifier. CWTP zinc sample results at the clarifier and the sump have remained in specification.

An incident investigation for the zinc excursion began on June 06, 2006, and is still in progress.

Should you require additional information or assistance, please contact Kelly Long, at (361) 987-7463.

Sincerely,

R. P. Smith
Vice President/General Manager
Formosa Plastics Corporation, Texas

ATTACH. 21

CC: CERTIFIED MAIL: 7003-3110-0005-6268-2495
Ms. Cindy Stanislawski
Texas Commission on Environmental Quality
Enforcement Division
Water Quality Compliance Monitoring Team (MC 224)
P.O. Box 13087
Austin, TX 78711-3087

FORMOSA PLASTICS CORPORATION, TEXAS

ISO-9002 CERTIFIED
ISO-14001 CERTIFIED

P. O. BOX 700
201 FORMOSA DRIVE
POINT COMFORT, TX 77978

PHONE: 361-987-7000
FAX: 361-987-2363

22
ATTACH. 22

FILE

October 14, 2005

CERTIFIED MAIL: 7005-1160-0004-0377-5958

Mr. Sinoel Contreras
Water Section Manager, Region 14
Texas Commission on Environmental Quality
NRC Building, Suite 1200
6300 Ocean Drive, Unit 5839
Corpus Christi, Texas 78412-5839

RE: Formosa Plastics Corporation, Texas
TPDES Permit No. WQ0002436000
Customer Number: CN600130017
Regulated Entity Number: RN100218973
High pH Excursion at Outfall 001

Dear Mr. Contreras:

Formosa Plastics Corporation, Texas, is submitting this letter to follow up our verbal notification for the pH excursion that occurred at the FPC-TX permitted Outfall 001 on Thursday October 6, 2005. The incident began while the facility was under a mandatory evacuation order, and ended when Emergency Personnel were allowed back into the unit to shut the outfall pump off.

Outfall 001:

Parameter:	pH of 10.49 standard units, maximum
Date:	October 6, 2005
Time Period:	6:15 PM to 7:29 PM
Duration:	74 minutes.
Excursion:	pH excursion greater than 9.0 standard units, exceeding 60 minutes in duration.

Anticipated Time Noncompliance Will Continue If Not Corrected:
Not Applicable.

24 – Hour Oral Report:
Hector Gonzalez, TCEQ Region 14, was notified verbally, on site, on October 7, 2005, within one business day.

Certified Mail may ONLY be combined with First-Class Mail® or Priority Mail®.
Certified Mail is not available for any class of international mail.
NO INSURANCE COVERAGE IS PROVIDED with Certified Mail. For valuables, please consider Insured or Registered Mail.
For an additional fee, a Return Receipt may be requested to provide proof of

ATTACH 22

Background:

On October 6, 2005, at approximately 3:20 PM, an explosion and fire occurred in the Olefins-II Unit. Several minutes later a plant-wide shutdown and evacuation was called, and the Wastewater Department began its shutdown activities. This shut down the physical treatment lines (IEM/DEMIN and Cooling Tower Blowdown) and the biological treatment line, including the pH adjustment systems associated with each of them. Pump TPT-32A, which pumps treated water to permitted Outfall 001, was inadvertently left running. When the instrument air supply was lost and the control valves stopped operating, control valve FIC-T137, which controls the flow from TTT-44 (IEM/DEMIN Treatment), failed open instead of closed. This allowed high pH water from the TTT-44 equalization tank to flow out, through the system to pump TPT-32A (which was left running) and out the Outfall. At 6:15 PM the pH of the water discharging through Outfall 001 reached 9.02 standard units, which was the beginning of the excursion. The pH continued increasing until it reached a maximum of 10.49 s.u. The flow was shutdown by Emergency Personnel at 7:29 PM, for a total excursion discharge time of 74 minutes.

Immediate Steps Taken to Reduce, Eliminate and Prevent Reoccurrence of the Noncompliance and to Mitigate Its Adverse Effects

As soon as Emergency Personnel were allowed to enter the wastewater control room, the pump was shut down stopping all flow to the bay, and ending the excursion at approximately 7:29 PM.

Should you require additional information or assistance, please contact Kelly Long, at (361) 987-7463.

Sincerely,

R. P. Smith
Vice President/General Manager
Formosa Plastics Corporation, Texas

FORMOSA PLASTICS CORPORATION, TEXAS

ISO-9002 CERTIFIED
ISO-14001 CERTIFIED

P. O. BOX 700
201 FORMOSA DRIVE
POINT COMFORT, TEXAS 77978

PHONE: 361/987-7000
FAX: 361/987-2363

July 29, 2005

CERTIFIED MAIL: 7003-3110-0005-6267-8610

ATTACH 23

Mr. Sinoel Contreras
Water Section Manager, Region 14
Texas Commission on Environmental Quality
NRC Building, Suite 1200
6300 Ocean Drive, Unit 5839
Corpus Christi, Texas 78412-5839

RE: Formosa Plastics Corporation, Texas
TPDES Permit No. WQ0002436000
Customer Number: CN600130017
Regulated Entity Number: RN100218973
High pH Excursion at Stormwater Outfall 010

Dear Mr. Contreras:

Formosa Plastics Corporation, Texas, is submitting this letter to follow up our telephone notification for the incident that occurred at FPC's permitted Stormwater Outfall 010 on Friday July 22, 2005. After taking the prerequisite water samples for opening the storm gate, all of which were within specification, permitted Outfall 010 was opened to release rainwater that had been falling in the area earlier in the day. Upon opening the gate a discharge sample was taken, per the permit, within 15 minutes after the discharge began. This was tested and the results came back with a pH of 9.4 standard units, exceeding the permit limit of 9.0 standard units. The gate was immediately closed. FPC believes this to have been a temporary pH "spike" in the flow. Additional samples were taken after the gate was closed, all of which were within specification.

Outfall 010:

Parameter:	pH of 9.4 standard units
Date:	July 22, 2005
Time Period:	11:00 PM to 11:20 PM
Duration:	20 minutes.
Excursion:	pH not to exceed 9.0 standard units

ATTACH. 23

Anticipated Time Noncompliance Will Continue If Not Corrected:
Not Applicable.

24 – Hour Oral Report:
Shea Ladner, TCEQ Region 14, was notified by phone on July 25, 2005, within one business day.

Background:
Intermittent heavy rains had been falling through the day, causing the storm ditches and Outfall 010 to fill. By 11:00PM the water needed to be released. All of the pre-discharge samples were good, as well as the continuous readings from the field pH meter and the pre-discharge visual inspection.

Immediate Steps Taken to Reduce, Eliminate and Prevent Reoccurrence of the Noncompliance and to Mitigate Its Adverse Effects

Immediately upon discovery of the high pH spike, the gate was shut.

Should you require additional information or assistance, please contact Kelly Long, at (361) 987-7463.

Sincerely,

R. P. Smith
Vice President/General Manager
Formosa Plastics Corporation, Texas

ATTACH. 23

CC: CERTIFIED MAIL: 7003-3110-0005-6267-8627
Ms. Cindy Stanislawski
Texas Commission on Environmental Quality
Enforcement Division
Water Quality Compliance Monitoring Team (MC 224)
P.O. Box 13087
Austin, TX 78711-3087

IW 102436 CO

Kathleen Hartnett White, *Chairman*
Larry R. Soward, *Commissioner*
Martin A. Hubert, *Commissioner*
Glenn Shankle, *Executive Director*

TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

Protecting Texas by Reducing and Preventing Pollution

RECEIVE
DEC 20 2006
Air/Toxics & Inspection Coordination Branch
6EN-A

December 18, 2006

CERTIFIED MAIL#7005 1820 0007 7265 4897
RETURN RECEIPT REQUESTED

Mr. R. P. Smith, Vice President/General Manager
Formosa Plastics Corporation, Texas (TCEQ Customer CN600130017)
P. O. Box 700
Point Comfort, Texas 77978

Re: Notice of Violation for the Comprehensive Compliance Investigation (TCEQ Investigation 517230) at: Formosa Plastics Facility, 201 Formosa Drive, Northeast of the City of, Point Comfort (Calhoun County), Texas; TCEQ Regulated Entity RN100218973; TCEQ Permit No.: WQ0002436-000; EPA ID No.: TX0085570

Dear Mr. Smith:

On October 26-27, 2006, Ramon G. Juarez of the Texas Commission on Environmental Quality (TCEQ) Corpus Christi Region Office conducted an investigation of the above-referenced facility to evaluate compliance with applicable requirements for wastewater treatment. Enclosed is a summary which lists certain alleged violations and additional issues identified as part of the investigation review process. A written description demonstrating that compliance has been achieved for each of the alleged violations has been received by this office. Therefore, these alleged violations are resolved and no further response is required. The additional issues identified in the summary will require a written response. Please submit to this office by January 15, 2007, a written description of action taken and the required documentation demonstrating that the issue has been properly addressed.

In the listing of alleged violations, we have cited applicable requirements, including TCEQ rules. If you would like to obtain a copy of the applicable TCEQ rules, you may contact any of the sources listed in the enclosed brochure entitled "Obtaining TCEQ Rules."

The Texas Commission on Environmental Quality appreciates your assistance in this matter. Please note that the Legislature has granted TCEQ enforcement powers which we may exercise to ensure compliance with environmental regulatory requirements. Self-reported effluent violations may be subject to enforcement including penalties, upon review by the Enforcement Division. We anticipate that you will resolve the alleged violations as required in order to protect the State's environment. If you have additional information that we are unaware of, you have the opportunity to contest the violations documented in this notice. Should you choose to do so, you must notify the Corpus Christi Region Office within 10 days from the date of this letter. At that time, the Water Section Manager will schedule a violation review meeting to be conducted within 21 days from the date of this letter. However, please be advised that if you decide to participate in the violation review process, the TCEQ may still require you to adhere to the compliance schedule included in the attached Summary of Investigation Findings until an official decision is made regarding the status of any or all of the contested violations.

If you or members of your staff have any questions, please feel free to contact Mr. Juarez in the Corpus Christi Region Office at (361) 825-3100.

Sincerely,

David M. Kennebeck
Water Section Manager
Corpus Christi Region Office

SBC/RGJ/aa

Enclosures: Summary of Investigation Findings
Obtaining TCEQ Rules

cc: Surveillance Section (6EN-AS)
U. S. EPA, Region 6
1445 Ross Avenue
Dallas, Texas 75202

Central Records, Bldg., E, MC 213

Summary of Investigation Findings

FORMOSA POINT COMFORT PLANT
201 FORMOSA DRIVE GATE 3
POINT COMFORT, CALHOUN COUNTY, TX 77978
Additional ID(s): TX0085570
WQ0002436000

Investigation # 517230
Investigation Date: 10/26/2006

ALLEGED VIOLATIONS NOTED AND RESOLVED

Track No: 261664

TWC Chapter 26.121(a)(1)

PERMIT TPDES Permit No. WQ0002436-008
Effluent Limitations & Monitoring Requirements; No.1; page 2; The permittee is authorized to discharge non-process area storm water, hydrostatic test water, fire water, non-contact steam condensate, and non-contact wash water.

Alleged Violation:
Investigation: 517230 Comment Date: 12/6/2006

Failure to prevent an unpermitted discharge of cooling tower blow down water via outfall 008. On the morning of July 8, 2006, a contractor at Formosa Plastics Corporation - Texas (FPC-TX) was excavating in the utilities area when a track hoe struck and damaged an underground 8-inch cooling tower blow down pipeline. The blow down water entered the storm water ditch which was already full with storm water due to heavy rain in the area. The commingled storm water and blow down water overflowed the gate structure at outfall 008. The combined discharged was estimated to be 140,000 gallons.

Recommended Corrective Action: The permittee is authorized to discharge non-process area storm water, hydrostatic test water, fire water, non-contact steam condensate, and non-contact wash water via out fall 008. Cooling tower blow down water is not authorized for discharge by the permit.

Resolution: The pipe line was isolated and repaired. Vacuum trucks were called out to capture as much of the blow down water as possible for diversion to the wastewater treatment plant. An incident investigation was conducted. Formosa environmental and wastewater personnel reported the incident according to TCEQ Non-Compliance Notification Protocol. The documentation is dated July 28, 2006 and was received on July 31, 2006. The Non-Compliance Notification is attached to this report as Attachment No. 20.

Track No: 261668

30 TAC Chapter 305.125(1)

PERMIT TPDES Permit No. WQ0002436-008
Effluent Limitations & Monitoring Requirements; No.1; page 2.

Alleged Violation:
Investigation: 517230 Comment Date: 12/6/2006

Failure to meet daily maximum discharge loading limit for total zinc at outfall 001. The facility reported 9.28 lbs/day loading for May 30, 2006. The daily maximum limit of 5.5 lbs /day of total zinc was exceeded. On May 29, 2006, the Chlor Alkli unit experienced a hydrochloric acid tank failure. The acid was contained within a secondary containment structure. The acid leached zinc from galvanized metal within the immediate area. This resulted in zinc deposited in the wastewater when the containment area was cleaned out and sent to the Combined Water Treatment Plant (CWTP) for treatment prior to discharge.

Recommended Corrective Action: The effluent shall comply with effluent limitations for total zinc lbs/day (loading) daily maximum. Submit immediately to the Region office a description of the corrective action that has been taken or is underway to become compliant with the permit limit.

Resolution: On May 29 & 30, 2006 the CWTP began to see elevated concentrations of zinc in the Chlor-Alkli unit wastewater. In response the CWTP increased the injection rate of metal reducing polymers to the treatment train, restricted the wastewater flow from the Chlor-Alkli unit and increased the sludge blow down from the clarifier to start removing zinc from the treatment unit. On May 31, 2006 the zinc concentrations from the Chlor-Alkli unit increased. In response the CWTP shut down the flow of incoming water from the Chlor-Alkli unit, reduced the flow from the treatment train to the final mixing sump and maintained a continous blow down from the clarifier. On June 2, 2006 zinc concentrations within the treatment train was reduced within specifications for the daily maximum (loading). Formosa personnel reported the incident according to TCEQ Non-Compliance Notification Protocol. The documentation is dated June 9, 2006 and is attached to this report as Attachment No. 21.

Track No: 261678

30 TAC Chapter 305.125(1)

PERMIT TPDES Permit No. WQ0002436-001
Effluent Limitations & Monitoring Requirements; No. 2; page 2a; & Other Requirements; No. 9 (a), (b), (c); page 14. The permittee shall maintain the pH not to be less 6.0 SU nor greater than 9.0 SU and shall not exceed 60 minute duration limit for outfall 001.

Alleged Violation:
Investigation: 517230 Comment Date: 12/6/2006

Failure to meet effluent limitation for pH maximum and duration at outfall 001. On October 6, 2005, the Texas Commission on Environmental Quality (TCEQ) Region 14 office received notification of an explosion and fire at the Formosa Plastics facility. The explosion was caused by a trailer hitting a six inch propylene line in the Olefins II unit causing it to rupture. The pH violation occurred on October 6, 2005, the day of the explosion and fire in the Olephins II unit. The pH violation is indirectly associated with the incident because it was caused by operator error during the evacuation process. The pH was reported at 9.0 SU to 10.5 SU for 74 minutes. The pH duration limit of 60 minutes above 9.0 SU and less than 11.0 SU was exceeded by 14 minutes.

Recommended Corrective Action: The permittee shall maintain the pH not to be less than 6.0 SU nor greater than 9.0 SU and shall not exceed 60 minute duration limit for outfall 001.

Resolution: As soon as emergency personnel were allowed to enter the wastewater control room, the discharge to Lavaca Bay was stopped, ending the pH maximum violation. Formosa environmental and wastewater personnel reported the incident according to TCEQ Non-Compliance Notification Protocol. The documentation is dated October 14, 2006 and is attached to this report as Attachment No. 22.

Track No: 261681

30 TAC Chapter 305.125(1)

PERMIT TPDES Permit No. WQ0002436-010
Effluent Limitations & Monitoring Requirements; No. 2; page 2g.
The permittee shall maintain the pH not to be less 6.0 SU nor greater than 9.0 SU.

Alleged Violation:
Investigation: 517230 Comment Date: 12/6/2006

Failure to meet effluent limitation for pH maximum at outfall 010. On July 22, 2005, intermittent heavy rains had been falling through the day causing the storm ditches and outfall 010 to fill. The gate was opened and the discharge sampled. The results indicated a 9.4 SU, exceeding the pH maximum permit limit of 9.0 SU. The gate was immediately closed. The pH violation is attributed to a temporary pH spike in the flow. Additional samples were taken after the gate was closed. The results were within the pH maximum permit limit of 9.0 SU

Recommended Corrective Action: The permittee shall maintain the pH not to be less than 6.0 SU nor greater than 9.0 SU.

Resolution: Immediately upon discovery of the high pH spike the gate at outfall 010 was

closed to prevent further discharge of suspect storm water. Formosa environmental and wastewater personnel reported the incident according to TCEQ Non-Compliance Notification Protocol. The documentation is dated July 29, 2005 and is attached to this report as Attachment No. 23.

ADDITIONAL ISSUES

Description	Additional Comments
ITEM	During the investigation conducted October 26, 2006, Dock and Channel Marker 22 measurements were collected. The Dock measurement from the surface of the water to the bottom of the bay measured 2.3 feet. The Channel Marker 22 measurement from the surface of the water to the bottom of the bay measured 4.2 feet. The depth measurements indicated a depth differential of 1.9 feet. According to FPC - TX personnel the diffuser is partially buried and is connected to a 36-inch pipe. The one-foot depth requirement is the distance from the diffuser to the surface of the water. The exact location of the diffuser is needed to determine the depth in reference to the natural bottom of the bay. The installation of a staff gauge or automated water level device is needed to establish a station datum at Channel Marker 22 from which all subsequent recorded water levels can be referenced. The permit requires daily water level measurements by a staff gauge or automated water level device.
ITEM	An inspection of the Lavaca Bay Diffuser was conducted on November 9, 2005. The inspection report indicated the conditions of the diffuser as functional and flowing. However, there are concerns regarding excessive sediment, debris, and marine growth on the exterior concrete and cages around the nozzles. The diver recommended the diffuser be cleaned so that a proper inspection can be conducted.