



Region 6 Compliance Assurance and Enforcement Division INSPECTION REPORT

Inspection Date(s):	05/15/2018		
Media:	Water		
Regulatory Program(s)	Clean Water Act		
Company Name:	The Dow Chemical Company		
Facility Name:	Dow Chemical - Freeport		
Facility Physical Location:	2301 N. Brazosport Blvd		
(city, state, zip code)	Freeport, Texas		
Mailing address:	332 SH 332 E		
(city, state, zip code)	Lake Jackson, TX 77566		
County/Parish:	Brazoria County		
Facility Contact:	Yvonne E. Samson	EH&S Leveraged Delivery Operations Leader	
	979-238-4814	ysamson@dow.com	
FRS Number:			
Identification/Permit Number:	TX0006483		
Media Number:			
NAICS:	424690		
SIC:	2869, 2865, 2812, 2821, 2819, 2822, 2813, 2879, 3339		
Personnel participating in inspection:			
Michael Williams	EPA / 6EN-WMH	Inspector	281-983-2150
Maria Valdez	Dow Chemical	EH&S	979-238-9778
Chuck Zemanek	Dow Chemical	Environmental Operations	
Mike Kidd	Dow Chemical	Environmental Operations	
EPA Lead Inspector Signature/Date			
	Michael D. Williams		Date
Supervisor Signature/Date			
	Carol Peters		Date

Section I - Introduction

PURPOSE OF THE INSPECTION

EPA Region 6 inspectors, Michael Williams arrived at The Dow Chemical Co.(Dow) at 10:45 am on May 15, 2018 for an unannounced inspection. I met with Maria Valdez, Environmental Health and Safety Specialist. I presented my credentials to Ms. Valdez and informed her that this was an EPA lead inspection to determine compliance with the Clean Water Act. The scope of the inspection was with permit TX0006483 and facility operations and maintenance under the Clean Water Act.

The information presented in this report is based on the materials and information supplied by the Dow Chemicals Company representatives, (the permittee), observations made during the inspection and records and reports maintained by the permittee.

FACILITY DESCRIPTION

Dow is located at 2301 N. Brazosport Blvd, Freeport, Texas. The plant is a large integrated chemical manufacturing facility with over 65 separate chemical processing units. These units are owned by Dow, joint ventures between Dow and other companies, or owned by other companies. The site manufactures a variety of bulk, commodity and specialty chemicals as well as thermosetting and thermoplastic resins. The chlor-alkali units play a major role in the manufacturing of various products across the site. Products and feed materials are distributed utilizing a variety of shipping methods including, pipeline transfers, tank trucks, rail cars, barges and ships. Electricity is generated onsite through a series of power plants. Salt Dome Operations and the Dow pipeline systems are an integral party of the Dow Freeport site. These operations are used to mine brine, transfer and store products and raw materials

Wastewater is generated from multiple wastewater streams generated by the process units at the facility that include both process and non-process wastewater. The wastewater is treated at the wastewater treatment plant. The plant is composed of a biological treatment system as well as neutralization, solids separation and settling to treat many of the wastewater streams. The facility has a variety of storm water discharges that are required to be monitored.

Section II- Observations

This inspection revealed the following observations:

- *Operations* – On the day of the inspection, the facility wastewater treatment plant appeared to be operating as designed. Exceedances have occurred during wet weather conditions with heavy rainfall. Within the last twelve months, the facility has exceeded their loading twice and flow limitations once for their storm water outfalls.

Section III- Areas of Concerns

This inspection revealed the following areas of concerns:

- No major areas of concerns on the day of the inspection.

Section IV – LIST OF APPENDICES

- Appendix A – Block Flow Overview

Appendix A

Block flow Overview

WWTP Flow Diagram

