



COVESTRO · TexMetrics

Company Compliance History Report

RN: RN100209931 | Generated: 2026-08-30 02:59

Customer: Covestro LLC

1. Facility Overview

Facility Name	COVESTRO
Regulated Entity (RN)	RN100209931
Location	8500 W BAY RD, BAYTOWN, TX 77523
County / Region	CHAMBERS / REGION 12 - HOUSTON

[Open in Google Maps](#)

2. Compliance History by Customer

There are 6 customers associated with this site. Ratings and classifications are from the TCEQ Compliance History Report (Texas Open Data Portal).

CN	Customer Name	Rating	Classification	Date
CN601544042	COVESTRO LLC	10.80	SATISFACTORY	2025-01-09
CN600359459	FIRST CHEMICAL TEXAS LP	1.88	SATISFACTORY	2025-01-09
CN602665556	LANXESS CORPORATION	1.70	SATISFACTORY	2025-01-09
CN600124440	BAYER CORPORATION	1.64	SATISFACTORY	2025-01-09
CN600371561	MILES INC	1.31	SATISFACTORY	2025-01-09
CN600381974	AIR PRODUCTS AND CHEMICALS INC	0.42	SATISFACTORY	2025-01-09

Site (RN) rating: 19.02 · SATISFACTORY · as of 2025-01-09

The RN rating is the site rating under 30 TAC Chapter 60. Customer rows are CN ratings associated with this RN.

TCEQ may publish newer ratings than this extract. Search the live database: [TCEQ Compliance History search](#). Ratings generally update about twice per year (March 1 / September 1) after ARCH.

3. Compliance Snapshot

19.02

SATISFACTORY

as of 2025-01-09

This is the **RN site rating**, not a customer (CN) rating, as of 2025-01-09.

Same NAICS (325199 — All Other Basic Organic Chemical Manufacturing): 55 scored Title V peers · median 5.52.

Same county (CHAMBERS): 62 Title V sites.

Scored peers are other Title V / Air Operating Permit sites with the same 6-digit NAICS and an RN rating greater than 0.

High Performer Above-satisfactory compliance record < 0.10	Satisfactory Generally complies with environmental regulations 0.10–55	Unsatisfactory Performs below minimal acceptable standards > 55
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Site rating of 19.02 is in the Satisfactory range. Classification boundaries can vary with complexity points (30 TAC §60.2).

4. Enforcement Snapshot (Last 5 Years)

Agreed Orders	2
Total Paid (Payable + SEP)	\$210,837

Notices of Enforcement	1
Notices of Violation	38
Violations recorded	156

Last 5 years (2021-08-30 to 2026-08-30).

This snapshot tracks progression from recorded violations to NOV's, NOEs, and agreed orders with payable penalties.

Active / open: 0

None currently identified in the matched extract.

Repeats: 8

Repeat-indicated violation(s). Repeat findings can increase enforcement risk and compliance-history points.

5. Violation mix

Work-process mix for 156 recorded violations in the last 5 years.

Category	Count	% of mix	Repeats
Pollutant / permit limits	38	24%	2
Flare operation	15	10%	0
Analyzers & CEM/CPMS	6	4%	0
LDAR & fugitives	13	8%	0
Events, MSS & control devices	24	15%	2
Records & reports	8	5%	0
Other	52	33%	4

Top units: thermal oxidizer / scrubber (17), fugitives (13).

TexMetrics groups TCEQ allegation text into work-process categories. Not an official TCEQ classification.

6. Recent & Notable Violations

All **active** and **repeat** violations, plus the 10 most recent others in the last 5 years.

Violations: 156 | Repeats: 8 | Active/open: 0

Date	Status	Repeat	Class	Allegation	Inv #
2023-02-27	RESOLVED	Yes	MODERATE	Failure to maintain temperature limit of 940 °C for Central Thermal Oxidizer (CTO) [EPN: FV87820115] (Category C4)	1866192
2023-02-27	RESOLVED	Yes	MODERATE	Failure to prevent exceedance of permitted limit of 0.04 lbs/hr for hydrochloric acid (HCl) for Vapor Combustor #1 (VC1) [EPN: FF87826211] (Category C7)	1866192
2023-02-27	RESOLVED	Yes	MODERATE	Failure to prevent exceedances of VOC (in lbs/hr) and CO (in lbs/hr) for Non-Selective Catalyst Reduction (NSCR) [EPN: FV87826152] (Category C4)	1866192
2023-02-27	RESOLVED	Yes	MODERATE	Failure to comply with required process vent provisions for DNT/SAC [EPN: FV022ST005] (Category C7)	1866192
2023-02-27	RESOLVED	Yes	MODERATE	Failure to comply with required process vent provisions for SAC [EPN: FV045ST004] (Category C7)	1866192
2023-02-27	RESOLVED	Yes	MODERATE	Failure to maintain temperature limit of 935 °C for Vapor Combustor #1 (VC1) [EPN: FF87826211] (Category C4)	1866192
2023-02-27	RESOLVED	Yes	MODERATE	Failure to prevent exceedance of permitted limit of 4.43 lbs/hr for nitrogen oxide (NOx) for Central Thermal Oxidizer (CTO) [EPN: FV87820115] (Category C7)	1866192

Date	Status	Repeat	Class	Allegation	Inv #
2023-02-24	RESOLVED	Yes	MODERATE	Failure to maintain temperature limit of 140°F for Tank [EPN: FT71000510] (Category C7)	1866191
2025-08-29	RESOLVED	No	MODERATE	Failure to submit biennial reports for the years of 2021 and 2023.	2029593
2025-08-29	RESOLVED	No	MODERATE	The facility failed to complete and submit EPA Form 8700-13 A/B to the Regional Administrator by March 1 of the following even numbered year and must cover activities during the previous year.	2029593
2025-08-29	RESOLVED	No	VERBAL	Failure to update the Notice of Registration (NOR).	2029593
2025-08-29	RESOLVED	No	VERBAL	Failure to maintain labels on hazardous waste containers.	2029593
2025-06-09	RESOLVED	No	MODERATE	Failure to control venting of volatile organic compound (VOC) emissions from storage tanks (EPNs: FT13501000 and FT13501500) (Category B17).	2028175
2025-06-09	RESOLVED	No	MODERATE	Failure to control venting of VOC and hazardous air pollutant (HAP) emissions from the process vent (EPN: FV13502800) (Category B17).	2028175
2025-06-09	RESOLVED	No	MINOR	Failure to prevent open-ended lines (OELs) for Fugitive Units (EPNs: FU13100000, FU13500000, and FU13600000) (Category C10).	2028175
2025-02-26	RESOLVED	No	MINOR	Failure to conduct weekly total dissolved solids (TDS) monitoring for the MDA Cooling Tower (EPN: FC830WK010) (Category C1).	2028171
2025-02-26	RESOLVED	No	MODERATE	Failure to maintain the permitted water flow rate to the Vent Scrubber (EPN: FS08211000) (Category B17).	2028171
2025-02-26	RESOLVED	No	MINOR	Failure to prevent open-ended lines (OELs) (Category C10).	2028171

Sorted active first, then repeats, then other recent (newest first within each group). Active rows are shaded red; repeat rows are shaded amber.

7. Agreed Orders

3 orders · total paid \$261,987

Order Date	TCEQ Docket No.	Program	Assessed	Payable	SEP	Total Paid
2024-12-18	2019-1310-AIR-E	AIR QUALITY	\$210,565	\$105,283	\$105,282	\$210,565
2023-06-20	2022-1626-AIR-E	AIR QUALITY	\$340	\$272	\$0	\$272
2018-12-12	2017-1039-AIR-E	AIR QUALITY	\$63,937	\$25,575	\$25,575	\$51,150
Total			\$274,842	\$131,130	\$130,857	\$261,987

Docket numbers link to the TCEQ CIO download. Total Paid = Payable Amount + SEP Offset.

Order obligations (last 5 years)

2024-12-18 | [2019-1310-AIR-E](#) | AIR QUALITY

Assessed \$210,565 / Payable \$105,283 / SEP \$105,282 / Total paid \$210,565

Incidents

Incident 347184 (Dec 7, 2020).
239.00 lbs anhydrous NH3 fugitive.

Corrective measures recognized

By September 29, 2017, obtained Permit by Rule ("PBR") Registration No. 148II6 that certified the increase in the PM hourly MAER and retrained the staff on the rolling throughput monitoring review process for Irganox in order to comply with the PM hourly MAER and throughput limit for the CD Reactor, EPN FV09509900

On November 1, 2017, claimed the PBR under 30 TEX. ADMIN. CODEs 106.472 that authorized the increase in the storage tank throughput limit for Storage Tank 090 548

By November 1, 2017, claimed the PBR under 30 TEX. ADMIN. CODEs 106.4 72 that authorized the change of service of the NH3 Dump Tank to a level control vessel for wastewater in order to comply with the throughput limit for the MDA II Vent Scrubber (Storage Tanks 081-045, 081-076, and 081-159) ; Covestro LLC -E

On November 2, 2017, claimed the PBR under 30 TEX. ADMIN. CODEs 106.472 that authorized the increase in the voe annual MAER and storage tank throughput limit for the Crude NitrobenzeneTank, EPN TK-2102

On November 7, 2018, submitted the PCC for the October 1, 2017 through September 30, 2018 certification period

By January 27, 2020, demonstrated that Storage Tank 091 010 is used for non-air contaminant service and obtained an amendment for NSR Permit No. 2005 that removed the throughput representations for Storage Tank 091 010; I. By January 6, 2021, obtained an amendment for NSR Permit No. 2035A that authorized the increase in the Multtranol throughput limit for the Line 6 Extruder Melt Pot

On March 9, 2022, conducted a stack test demonstrating compliance with the NOx hourly MAER for the Vapor Combustor No. 1, EPN FF87826211; Covestro LLC

On October 21, 2022, obtained Permit by Rule Registration No. 170594 that increased the HCl hourly MAER for the Vapor Combustor No. 1, EPN FF87826211; and

By April 13, 2024 , implemented and maintained an Environmental Management System in order to ensure that all instances of deviations are reported in a timely manner and the PCCs are submitted in a timely manner

2023-06-20 | [2022-1626-AIR-E](#) | AIR QUALITY

Assessed \$340 / Payable \$272 / SEP \$0 / Total paid \$272

Alleged effluent / permit issues

During a record review for the Plant conducted on May 5, 2020 through June 2, 2020, an investigator documented that the Respondent failed to report all instances of deviations

Corrective measures recognized

The Executive Director recognizes that on April 25, 2019, the Respondent submitted the deviation report for the October 1, 2018 through March 31, 2019 reporting period that included the deviations for failing to perform weekly calibrations for the Non-Selective Catalyst Reduction ("NSCR") Continuous Emissions Monitoring System ("CEMS"), failing to maintain records for the quarterly visible emissions observations for the Soda Ash Solution tank and Soda Ash Scrubber, and failing to maintain records for the quarterly visible emissions observations for the Residue Storage Silo and Residue Loading Dust Collector

Public CIO / signed-order text. Not legal advice.

TCEQ affirmative defense = sudden unavoidable breakdown, 30 TAC 101.222.

8. Notices of Enforcement

12 NOEs for this RN

NOE Date	TCEQ Docket No.	Docket Created	Investigation #	Violations
2024-01-24	2024-0219-AIR-E	2025-11-19	1930042	1
2021-07-07	2019-1310-AIR-E	2024-12-18	1701909	2
2021-05-17	2019-1310-AIR-E	2024-12-18	1704689	2
2021-03-15	2019-1310-AIR-E	2024-12-18	1704079	1
2020-08-05	2019-1310-AIR-E	2024-12-18	1631832	5
2020-06-26	2022-1626-AIR-E	2023-06-20	1631835	1
2019-08-29	2019-1310-AIR-E	2024-12-18	1517787	3
2019-08-28	2019-1310-AIR-E	2024-12-18	1437550	3
2017-06-28	2017-1039-AIR-E	2018-12-12	1416790	2
2017-04-28	2017-1039-AIR-E	2018-12-12	1416790	3
2013-04-23	2013-1157-AIR-E	2014-02-22	1050413	1

NOE Date	TCEQ Docket No.	Docket Created	Investigation #	Violations
2011-06-17	2011-1191-AIR-E	2012-07-08	900008	1

9. Notices of Violation

38 NOVs for this RN (showing 25 most recent)

NOV Date	Investigation #	NOV ID	Violations
2026-06-02	2107880	622547832026152	8
2026-04-23	2107460	677319062026113	4
2026-03-23	2107807	854242212026082	1
2026-02-27	2106293	294560882026057	4
2026-02-09	2107466	908591592026035	3
2026-02-02	2107203	162603292026029	1
2025-09-02	2029593	492537562025241	4
2025-06-09	2028175	956376672025160	3
2025-02-26	2028172	936478752025055	3
2025-02-26	2028171	929595952025052	5
2025-02-26	2028173	822604112025052	7
2025-01-24	2028143	696309562025024	1
2025-01-17	2028114	682353322025017	1
2024-06-03	1956316	420562992024151	14
2024-05-20	1956257	427504202024138	1
2024-05-20	1956275	165592232024138	7
2024-05-15	1956258	305482522024135	1
2024-04-18	1956256	143320482024106	2
2024-02-29	1956317	238714282024059	2
2024-02-28	1956277	788523342024058	3
2024-02-28	1956272	461377432024059	3
2023-04-04	1866178	558394532023093	6
2023-03-02	1866165	439451942023060	5
2023-03-01	1866177	233728562023059	6
2023-02-28	1866176	849554932023058	2

10. Data Sources & Methodology

Data compiled from publicly available TCEQ / Texas Open Data Portal extracts processed on 2026-08-30 02:59.

- [TCEQ Compliance History Report \(Open Data mich-cjem\)](#)
- [TCEQ Compliance History live search](#)
- [Administrative Orders \(Open Data u66a-ggqi\)](#)
- [Notices of Enforcement \(Open Data rua3-iswk\)](#)
- [Notices of Violation \(Open Data mwzi-gyvw7\)](#)
- [Violation Citations \(Open Data gyd4-wuys\)](#)
- [TCEQ Commission Issued Orders \(CIO\) for docket PDFs](#)

Ratings are based on TCEQ's five-year compliance history period. The agency updates classifications about March 1 and September 1 (after ARCH). As-of dates for this extract appear in the report body.

This report is for informational purposes only and does not constitute legal advice. Official compliance history and enforcement documents should be obtained directly from TCEQ for regulatory decision-making.

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