

Texas Commission on Environmental Quality  
**Remediation Division Correspondence Identification Form**

**SITE & PROGRAM AREA IDENTIFICATION**

SITE LOCATION		REMEDIATION DIVISION PROGRAM AND FACILITY IDENTIFICATION	
Site Name: <b>Former Blue Star Recycling</b>		Is This Site Being Managed Under A State Lead Contract? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
Address 1: <b>9505 and 9527 South Central Expressway</b>		Program Area:	<b>VO LUNTARY CLEANUP PROGRAM</b> ▼
Address 2:		Mail Code:	<b>MC-214</b>
City: <b>Dallas</b>	State: <b>Texas</b>	Is This A New Site To This Program Area? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
Zip Code: <b>75241</b>	County: <b>Dallas</b> ▼		
TCEQ Region: <b>Region 4 - Dallas/Fort Worth</b>			

**DOCUMENT(S) IDENTIFICATION**

PHASE OF REMEDIATION	DOCUMENT NAME
1. MISCELLANEOUS ▼	VCP APPLICATION FORM ▼
2. MISCELLANEOUS ▼	VCP AGREEMENT ▼
3. PRE-ASSESSMENT ▼	PHASE I SITE ASSESSMENT ▼
4. PRE-ASSESSMENT ▼	PHASE II SITE ASSESSMENT ▼
5. MISCELLANEOUS ▼	Core Data Form

**CONTACT INFORMATION**

**RESPONSIBLE PARTY/APPLICANT/CUSTOMER**

Name: **Lori Frauli Trulson**  
 Company: **City of Dallas**                      Phone Number: **(214) 671-8967**                      Fax Number: **(214) 670-0134**  
 Address 1: **1500 Marilla Street, Suite 7AN**                      City: **Dallas**                      State: **TX**                      Zip Code: **75201**  
 Address 2:                      Email Address: **Lori.trulson@dallas.gov**

**ENVIRONMENTAL CONSULTANT/REPORT PREPARER/AGENT**

Name: **Kenneth Tramm, PhD, PG, CHMM**  
 Company: **Modern Geosciences**                      Phone Number: **(682) 223-1322**                      Fax Number: **(682) 223-1593**  
 Address 1: **5100 Thompson Terrace**                      City: **Colleyville**                      State: **TX**                      Zip Code: **76034**  
 Address 2:                      Email Address: **[REDACTED]**

**TCEQ INTERNAL USE ONLY**

Document No.	TCEQ Database Term	Document No.	TCEQ Database Term
1.	VCP APPLICATION	4.	PHASE II
2.	VCP AGREEMENT	5.	CHANGE CONSULTANT/CONTACT
3.	PHASE I		



**MODERN GEOSCIENCES**  
TRUSTED ENVIRONMENTAL ADVISORS

DATE July 28, 2022  
PROJECT 22167

**TO Texas Commission on Environmental Quality**  
VCP/CA Section – Voluntary Cleanup Program (VCP)  
Remediation Division  
PO Box 13087  
Austin, Texas 78711-3087  
Attn: Ms. Jennifer Westerman

**SUBJECT VCP Application Package**  
Former Blue Star Recycling  
9505 and 9527 South Central Expressway  
Dallas, Dallas County, Texas

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VCP-CA Section

Dear Ms. Westerman:

Modern Geosciences, LLC (Modern) is pleased to provide the attached Voluntary Cleanup Program (VCP) Application Package to the Texas Commission on Environmental Quality (TCEQ) for the above-referenced property (Site) prepared on behalf of the City of Dallas (VCP Applicant).

Between January 2018 and May 2019, Blue Star Recycling collected asphalt roof shingles on its leased property in order to process the shingle material into a substance that could be used in paving and asphalt road-mix products. In response to community concerns and non-compliance at the Site, the City and Texas Commission on Environmental Quality engaged in legal action in an effort to see the property owner and operator address concerns.

On December 10, 2020, the Court signed an Agreed Final Judgment. In exchange, the City of Dallas agreed to remove and dispose of the solid waste at the property and to perform an environmental site assessment. The City engaged a contractor to assist in the removal of all remaining shingle material at the property. The material was moved to the City of Dallas' McCommas Bluff Landfill and is being properly recycled. This process included mitigation efforts to minimize the impact on the neighboring community and employed air quality monitoring both on and off the property throughout the removal event. Data from this event was shared through a Community Dashboard that can be accessed here: <https://storymaps.arcgis.com/stories/0a10210bd0924f1e96774834c6f0eda2>

As part of the assessment process, elevated lead concentrations were noted in surface soils at the Site apparently related to prior fill material placed at the Site prior to the shingle recycling operations.



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As the current owner of the Site, the City of Dallas has completed the delineation of lead to residential goals and will address remaining corrective action through the Texas VCP.

Modern and the City of Dallas look forward to working with the TCEQ towards closure of the Site. If you should have any questions or comments, please feel free to contact the undersigned at 682.223.1322.

Respectfully submitted,



Kenneth S. Tramm, PhD, PG, CHMM  
PROGRAM MANAGER

**MODERN GEOSCIENCES**

TEXAS REGISTERED GEOSCIENCE FIRM 50411

TEXAS REGISTERED ENGINEERING FIRM F-16201

ATTACHMENTS



**MODERN GEOSCIENCES**  
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*VCP DOCUMENTS*



TCEQ Use Only

# TCEQ Core Data Form

For detailed instructions regarding completion of this form, please read the Core Data Form Instructions or call 512-239-5175.

## SECTION I: General Information

1. Reason for Submission (If other is checked please describe in space provided.)		
<input checked="" type="checkbox"/> New Permit, Registration or Authorization (Core Data Form should be submitted with the program application.)		
<input type="checkbox"/> Renewal (Core Data Form should be submitted with the renewal form)	<input type="checkbox"/> Other	
2. Customer Reference Number (if issued)	Follow this link to search for CN or RN numbers in Central Registry**	3. Regulated Entity Reference Number (if issued)
CN 600331730		RN

## SECTION II: Customer Information

4. General Customer Information	5. Effective Date for Customer Information Updates (mm/dd/yyyy)	05/09/2022	
<input type="checkbox"/> New Customer <input type="checkbox"/> Update to Customer Information <input type="checkbox"/> Change in Regulated Entity Ownership <input type="checkbox"/> Change in Legal Name (Verifiable with the Texas Secretary of State or Texas Comptroller of Public Accounts)			
<b>The Customer Name submitted here may be updated automatically based on what is current and active with the Texas Secretary of State (SOS) or Texas Comptroller of Public Accounts (CPA).</b>			
6. Customer Legal Name (If an individual, print last name first: eg: Doe, John)		If new Customer, enter previous Customer below:	
City of Dallas			
7. TX SOS/CPA Filing Number	8. TX State Tax ID (11 digits)	9. Federal Tax ID (9 digits)	10. DUNS Number (if applicable)
11. Type of Customer:		Partnership: <input type="checkbox"/> General <input type="checkbox"/> Limited	
<input type="checkbox"/> Corporation <input type="checkbox"/> Individual Government: <input checked="" type="checkbox"/> City <input type="checkbox"/> County <input type="checkbox"/> Federal <input type="checkbox"/> State <input type="checkbox"/> Other		<input type="checkbox"/> Sole Proprietorship <input type="checkbox"/> Other: Limited Liability Company	
12. Number of Employees		13. Independently Owned and Operated?	
<input type="checkbox"/> 0-20 <input type="checkbox"/> 21-100 <input type="checkbox"/> 101-250 <input type="checkbox"/> 251-500 <input checked="" type="checkbox"/> 501 and higher		<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
14. Customer Role (Proposed or Actual) – as it relates to the Regulated Entity listed on this form. Please check one of the following			
<input checked="" type="checkbox"/> Owner <input type="checkbox"/> Operator <input type="checkbox"/> Owner & Operator <input type="checkbox"/> Occupational Licensee <input type="checkbox"/> Responsible Party <input checked="" type="checkbox"/> Voluntary Cleanup Applicant <input type="checkbox"/> Other:			
15. Mailing Address:			
City                      State    TX                      ZIP                      ZIP + 4			
16. Country Mailing Information (if outside USA)		17. E-Mail Address (if applicable)	
18. Telephone Number	19. Extension or Code	20. Fax Number (if applicable)	
(    ) -		(    ) -	

## SECTION III: Regulated Entity Information

21. General Regulated Entity Information (If 'New Regulated Entity' is selected below this form should be accompanied by a permit application)	
<input checked="" type="checkbox"/> New Regulated Entity <input type="checkbox"/> Update to Regulated Entity Name <input type="checkbox"/> Update to Regulated Entity Information	
<b>The Regulated Entity Name submitted may be updated in order to meet TCEQ Agency Data Standards (removal of organizational endings such as Inc, LP, or LLC).</b>	
22. Regulated Entity Name (Enter name of the site where the regulated action is taking place.)	
Former Blue Star Recycling	

23. Street Address of the Regulated Entity: <i>(No PO Boxes)</i>	9505 and 9527 S. Central Expressway						
	City	Dallas	State	TX	ZIP	75241	ZIP + 4
24. County	Dallas						

**Enter Physical Location Description if no street address is provided.**

25. Description to Physical Location:	The Site is located adjacent northwest of South Central Expressway and McCommas Bluff Road.
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26. Nearest City	State	Nearest ZIP Code
Dallas	TX	75241

27. Latitude (N) In Decimal:	32.680736°	28. Longitude (W) In Decimal:	-96.734192°
Degrees	Minutes	Seconds	Degrees
32	40	50.65	96
			44
			03.09

29. Primary SIC Code (4 digits)	30. Secondary SIC Code (4 digits)	31. Primary NAICS Code (5 or 6 digits)	32. Secondary NAICS Code (5 or 6 digits)

33. What is the Primary Business of this entity? <i>(Do not repeat the SIC or NAICS description.)</i>
Former Blue Star Recycling

34. Mailing Address:	1500 Marilla Street, Suite 7AN [City of Dallas, Office of Environmental Quality & Sustainability]						
	[Attn: Lori Frauli Trulson, 1500 Marilla Street, 7AN]						
	City	Dallas	State	TX	ZIP	75201	ZIP + 4

35. E-Mail Address:	lori.trulson@dallascityhall.com
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36. Telephone Number	37. Extension or Code	38. Fax Number <i>(if applicable)</i>
( 214 ) 671-8967		( 214 ) 670-134

**39. TCEQ Programs and ID Numbers** Check all Programs and write in the permits/registration numbers that will be affected by the updates submitted on this form. See the Core Data Form instructions for additional guidance.

<input type="checkbox"/> Dam Safety	<input type="checkbox"/> Districts	<input type="checkbox"/> Edwards Aquifer	<input type="checkbox"/> Emissions Inventory Air	<input type="checkbox"/> Industrial Hazardous Waste
<input type="checkbox"/> Municipal Solid Waste	<input type="checkbox"/> New Source Review Air	<input type="checkbox"/> OSSF	<input type="checkbox"/> Petroleum Storage Tank	<input type="checkbox"/> PWS
<input type="checkbox"/> Sludge	<input type="checkbox"/> Storm Water	<input type="checkbox"/> Title V Air	<input type="checkbox"/> Tires	<input type="checkbox"/> Used Oil
<input checked="" type="checkbox"/> Voluntary Cleanup	<input type="checkbox"/> Waste Water	<input type="checkbox"/> Wastewater Agriculture	<input type="checkbox"/> Water Rights	<input type="checkbox"/> Other:
TBD				

**SECTION IV: Preparer Information**

40. Name:	Kenneth S. Tramm, PhD, PG, CHMM	41. Title:	Program Manager
42. Telephone Number	43. Ext./Code	44. Fax Number	45. E-Mail Address
( 682 ) 223-1322	204	( 682 ) 223-1593	

**SECTION V: Authorized Signature**

46. By my signature below, I certify, to the best of my knowledge, that the information provided in this form is true and complete, and that I have signature authority to submit this form on behalf of the entity specified in Section II, Field 6 and/or as required for the updates to the ID numbers identified in field 39.

Company:	City of Dallas	Job Title:	Senior Environmental Coordinator
Name <i>(In Print)</i> :	Lori Frauli Trulson	Phone:	( 214 ) 671- 8967

Signature:

*Joie Kauli-Tudson*

Date:

*7/14/2022*

CK 10930

OFFICE USE ONLY: PCA number: _____ VCP Project number: <u>64535</u>
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TCEQ - Revenue Section  
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**TEXAS COMMISSION ON ENVIRONMENTAL QUALITY  
VOLUNTARY CLEANUP PROGRAM**

**Program Application**

Please complete this form (Form 10242), a Core Data Form (Form 10400) and a VCP Agreement (Form 10242 to request assistance and review from TCEQ staff in the Voluntary Cleanup Program (VCP) pursuant to §361.604 of the Texas Solid Waste Disposal Act. You may download these documents via the Internet at <http://www.tceq.texas.gov/state.tx.us/remediation/vcp/vcp.html>

Complete all applicable sections. The TCEQ may reject incomplete or inaccurate applications as per §361.605 of the VCP statute. To accurately complete this form, please refer to the VCP Application Instructions or call the TCEQ's Voluntary Cleanup Section at (512) 239-5891 with any questions concerning the completion of this form.

**General Site Information**

Site Name: Former Blue Star Recycling  
 Site Size (acres): Approximately 4.358 Acres  
 Regulated Entity Reference No. (if issued): \_\_\_\_\_ CN- 600331730

**IMPORTANT - Please attach a completed CORE Data Form TCEQ-10400 for Applicant A Only**

**Applicant(s)**

**Applicant A** (The person or entity seeking review and approval of a plan or report and/or issuance of a VCP Certificate of Completion by the TCEQ. Applicant A is responsible for payment of TCEQ costs of review and oversight unless indicated otherwise on page 2 of this form).

Applicant : <b>City of Dallas</b>		
Contact Person: <b>Lori Frauli Trulson</b>	Title: <b>Senior Environmental Coordinator</b>	
Customer Reference No. (if issued):		
Address: <b>1500 Marilla Street, Suite 7AN</b>		
City, State, Zip: <b>Dallas, Texas 75201</b>		
Organization: <b>City of Dallas</b>	Phone: <b>214-671-8967</b>	Fax: <b>214-670-0134</b>
Interest in Property: <b>Owner</b>		
Receive copies of TCEQ correspondence? <input checked="" type="checkbox"/> Yes      ___ No		

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VCP-CA Section

**Applicant B**

Applicant :		
Contact Person:	Title:	
Customer Reference No. (if issued): CN		
Address:		
City, State, Zip:		
Organization:	Phone:	Fax:
Interest in Property:		
Receive copies of TCEQ correspondence? <input type="checkbox"/> Yes <input type="checkbox"/> No		

**Applicant C**

Applicant :		
Contact Person:	Title:	
Customer Reference No. (if issued): CN		
Address:		
City, State, Zip:		
Organization:	Phone: ( )	Fax: ( )
Interest in Property:		
Receive copies of TCEQ correspondence? <input type="checkbox"/> Yes <input type="checkbox"/> No		

If there are more than three applicants, list others under "Additional Applicants" on page 8 of this form.

**Current Site Owner (if different from an applicant)**

Owner(s) : <b>Same as Applicant A</b>		
Contact Person:	Title:	
Customer Reference No. (if issued):		
Address:		
City, State, Zip:		
Organization:	Phone:	Fax:

**Other Contacts** (Consultant/Attorney)

Name(s): <b>Kenneth Tramm, PhD, PG, CHMM</b>		Title: <b>Program Manager</b>	
Customer Reference No. (if issued): CN			
Organization: <b>Modern Geosciences</b>		Phone: <b>(682) 223-1322</b>	Fax: <b>(682) 223-1593</b>
Address: <b>5100 Thompson Terrace</b>			
City: <b>Colleyville</b>		State: <b>TX</b>	Zip Code: <b>76034</b>

Name(s):		Title:	
Customer Reference No. (if issued): CN			
Organization:		Phone:	Fax:
Address:			
City:		State:	Zip Code:

**Billing Information**

If billing should be directed to a person other than Applicant A, please enter the required information below and include their signature consenting to the obligation for payment of TCEQ oversight costs.

Name(s): <b>Same as Applicant A</b>		Title:	
Customer Reference No. (if issued):			
Organization:		Phone:	Fax: ( )
Address:			
City:		State:	Zip Code:
Signature of Consent:			Date:

**Current Property Use** (Use percentage if site is divided into different use categories.)

Residential \_\_\_\_\_ Other (e.g., agricultural, recreational) \_\_\_\_\_  
Non-residential  X  If non-residential, type of business  Vacant commercial/industrial

Is a real estate transaction imminent for this site?  No   
If yes, what is the planned closing date? \_\_\_\_\_

**Latitude/Longitude**

Latitude (degrees, min., sec. N or decimal degrees)  32.680736°

Longitude (degrees, min., sec. W or decimal degrees) -96.734192°

Date of collection 05/09/22 Organization providing collection data Google Earth

Check the method used to determine latitude and longitude:

GPS - Real Time Differentially Corrected \_\_\_\_\_

GPS - Post Processed Differentially Corrected \_\_\_\_\_

Map Interpolation - Manual \_\_\_\_\_

Map Interpolation - Digital Google Earth \_\_\_\_\_

DOQQ \_\_\_\_\_

If using GPS, please state professional unit brand name, model number and accuracy tolerances.

If using Map Interpolation, please state which USGS quad map was used for interpolation.

If using DOQQ Interpolation, please state which DOQQ was used for interpolation.

Does the latitude and longitude listed above refer to the

Center of the property?

Main entrance to the property?

Other, please describe \_\_\_\_\_

### VCP Eligibility and Involvement with Other Regulatory Programs

Is the site subject to a TCEQ permit or administrative order? Yes  No

Have response actions been initiated at the site on or after April 19, 1996 that were not covered by a VCP agreement? Yes  No

Note: Response actions initiated by the VCP applicant on or after April 19, 1996, that were not covered by a VCP agreement may cause the applicant to become ineligible for the VCP.

Has a state or federal Notice of Violation or any other notice of enforcement action been issued relating to contamination at the site? Yes  No

Has there been any prior contact with any state or federal environmental regulatory programs or agencies relating to environmental issues at this site? Yes  No

If yes, please describe all prior contact with any state or federal environmental regulatory programs or agencies which relate to each of these questions. Attach additional sheets as necessary.

Is a request for reimbursement pre-approval currently under review by the Petroleum Storage Tank (PST) Program? Yes  No

If yes, then please describe the site's status in the PST Program: \_\_\_\_\_

Please provide any and all state and federal identification numbers related to the property in question, including any solid waste registration, leaking petroleum storage tank, CERCLIS, RCRIS, UIC, etc. registration numbers which have been assigned. **RN110114022:** R04110114022, 100509, TXR05EG53, TXR1522DJ **RN105457519:** 100229, 79838, TXR05X011

**Contaminated Media and Contaminants Present**

Have contaminants been detected in on-site media? Yes  No

Please check the chemicals of concern within each contaminant category and the media which have been affected:

Contaminant Category	Soil	Groundwater	Surface Water	Sediment
*VOCs				
*SVOCs				
*Heavy Metals	<b>X</b>			
*Chlorinated Solvents				
Pesticides				
TPH				
PCBs				
Other _____				

\*Please describe: Lead in shallow surface soil

**Applicant’s Intended Response Action Objectives (Cleanup Levels)**

\_\_\_\_\_ Not known at this time. Applicant wishes to receive guidance from the VCP prior to the signing of a VCP agreement.

**Texas Risk Reduction Program Rules (30 TAC Chapter 350) - Check Appropriate Standard and Tier Level:**

\_\_\_\_\_ Self-Implemented Cleanup to Remedy Standard A, Tier 1 \_\_\_ Tier 2 \_\_\_ Tier 3 \_\_\_  
 Non Self-Implemented Cleanup to Remedy Standard A, Tier 1  Tier 2  Tier 3   
 \_\_\_\_\_ Cleanup to Remedy Standard B, Tier 1 \_\_\_ Tier 2 \_\_\_ Tier 3 \_\_\_

**PST Rules (30 TAC Chapter 334) - Check Appropriate Standard:**

\_\_\_\_\_ Cleanup to generic risk-based levels (following PST Plan A requirements).  
 \_\_\_\_\_ Cleanup to site specific risk-based levels not relying on engineering or institutional controls (following PST Plan B requirements).

Cleanup to site specific risk-based levels which rely on engineering or institutional controls (following PST Plan B requirements).  
 Other (explain) \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

### **Federal Brownfields Tax Deduction**

Are you requesting TCEQ certification that the site is eligible for a federal tax deduction under the Taxpayer Relief Act of 1997 (HR 2014)? Yes  No

If yes, please submit a Brownfields Tax Deduction Pre-Certification Form. This form may be downloaded from <http://www.tceq.state.tx.us/assets/public/remediation/vcp/taxform>

### **State Property Tax Abatements for Brownfields**

Are you interested in signing an agreement with the local taxing authority to receive a property tax abatement after issuance of the VCP Certificate of Completion, as allowed under Section 312.211 of the Texas Tax Code? Yes  No

If yes, please read the application instructions for more information about this tax abatement.

### **Environmental Assessment**

An environmental assessment that includes the following information must be attached to this application:

1. a legal description of the site, including a site map drawn to scale;
2. the physical characteristics of the site;
3. the operational history of the site, to the extent the history is known by the applicant;
4. information that the applicant is aware of concerning the nature and extent of any contamination and/or release at the site and in areas contiguous to the site; and
5. relevant information the applicant is aware of concerning the potential for human and environmental exposure to contamination at or emanating from the site.

### **Intent to Participate**

The undersigned requests oversight by the TCEQ of investigation and cleanup activities of possible contamination at the property described above and intends to negotiate in good faith, a written agreement with the TCEQ to provide technical and regulatory oversight. This Intent to Participate does not constitute such an agreement and neither TCEQ nor the undersigned will be bound to proceed with VCP oversight unless such an agreement is executed. Applicants should be aware that in order for the TCEQ to issue a VCP Certificate of Completion for an entire site, the applicant must provide adequate information to document that the entire site meets the applicable standards. As an alternative, the applicant may pursue a VCP Certificate of Completion for only a portion of the site, as a partial response action area. The agreement will describe the project activities of each party and will require Applicant A (unless indicated otherwise on page 2 of this form) to reimburse the TCEQ for all of its oversight costs. By completing and signing this Intent to Participate and that excepting areal limitations with partial response actions, all environmental media which exceed the critical Protective Concentration Levels shall be addressed through appropriate response actions. The undersigned affirms the applicant's financial capability to

perform the voluntary cleanup. The Executive Director may also request additional information to support this affirmation.

With this Intent to Participate, the undersigned does not admit or assume liability for investigation or cleanup of the site. In addition, the undersigned may terminate the Intent to Participate at any time. If the TCEQ rejects the application, it will notify the applicant and explain the reasons for rejection and will refund half of the application deposit, unless the applicant indicates a desire to resubmit a corrected application. An applicant can resubmit an application once without submitting an additional application fee, if the applicant resubmits within 45 days after the rejection notice date.

### **Deposit of Oversight Costs**

The applicant must submit with this application, a deposit in the amount of one thousand dollars (\$1,000), and made payable to the Texas Commission on Environmental Quality. Deposits may be made in the form of company or personal checks. If a deposit check is returned due to insufficient funds, the application will be considered incomplete and will be rejected. Cash deposits will not be accepted.

**Please execute this Intent to Participate in the space below and return it and all associated documents (e.g., environmental assessment reports) to:**

**Attention: Cashier  
Texas Commission on Environmental Quality  
MC- 214  
P.O. Box 13088  
Austin, Texas 78711-3088**

**For overnight or express mail please use the following street address:**

**Attention: Cashier  
Texas Commission on Environmental Quality  
MC-214  
12100 Park 35 Circle  
Austin, Texas 78753**

**\*\*\*\*\*Please do not send the application and associated documents directly to the VCP. This will only result in a delay in processing your application.\*\*\*\*\***

**If you have any questions on how to fill out this form or about the VCP, please contact us at 512/239-5894.**

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, contact the TCEQ at 512-239-3282.

**Correctness of Information**

The undersigned affirm that the information contained in this application is true and accurate to the best of their knowledge.

**Applicant's Signatures**

**Applicant A**

By: Lori Frauli Trulson  
(signature)

Name: Lori Frauli Trulson  
(print or type)

Date: 7/14/2022

Title: Senior Environmental Coordinator

Company: City of Dallas

Phone: 214-671-8967

**Applicant B**

By: \_\_\_\_\_  
(signature)

Name: \_\_\_\_\_  
(print or type)

Date: \_\_\_\_\_

Title: \_\_\_\_\_

Company: \_\_\_\_\_

Phone: \_\_\_\_\_

**Applicant C**

By: \_\_\_\_\_  
(signature)

Name: \_\_\_\_\_  
(print or type)

Date: \_\_\_\_\_

Title: \_\_\_\_\_

Company: \_\_\_\_\_

Phone: (\_\_\_\_) \_\_\_\_\_

**VCP Application Supplemental Information**  
Former Blue Star Recycling  
9505 and 9527 South Central Expressway, Dallas, Texas

**Reports**

- **Phase I Environmental Site Assessment**, Former Blue Star Recycling, 9505 and 9527 S. Central Expressway, Dallas, Texas; Modern Project No. 20202; dated April 9, 2021.
- **Phase II Site Investigation Report**, Former Blue Star Recycling, 9505 and 9527 S. Central Expressway, Dallas, Texas; Modern Project No. 20202; dated June 7, 2021.

**Attachment**

- **Regulatory Activity Summary**

**Regulatory Activity Summary**  
Former Blue Star Recycling  
9505 and 9527 South Central Expressway  
Dallas, Dallas County, Texas

The Site previously operated as an asphaltic roof-shingle recycling facility that operated at 9505 and 9527 South Central Expressway between January 2018 and April 2019. In April 2019, a court order was issued to Blue Star Recycling (BSR) to stop accepting and processing building materials (shingles, wood, brick, etc.) and remove the waste material from the Site.

According to the TCEQ Central Registry, a complaint was received by the TCEQ in October 2018 concerning a previous business that operated at the Site (Blue Star Recycling). The TCEQ Central Registry noted the “complainant alleges there are two large piles of roofing shingles and is unsure if the property has the required authorization to operate. The complainant also alleged that the operator is stockpiling shingles without removing the materials and stockpiling material at two locations.” An investigation was conducted in November 2018. The TCEQ issued a Notice of Enforcement (NOE) on March 11, 2019. The violations included:

- Failure to have a fire prevention and suppression plan and failure to make that plan available to the local fire prevention authority. Failure to report any updates or changes to information contained in the Facility's site report within 90 days of the effective date of the change.
- Failure to maintain adequate cost closure estimates for the maximum inventories of all processed and unprocessed combustible materials stored outdoors.

According to the regulatory database, an NOV was issued by the TCEQ on June 28, 2019 for “failure to obtain a Permit by Rule (PBR)” and for “failure to keep asphalt-laden dust from leaving their property.” The database also stated that “the entity forfeited existence with the Secretary of State” and is no longer operating. An additional complaint was received in May 2020, regarding “the spreading of asphalt shingles near the creek on the property.” An investigation was conducted in June 2020 and no Notice of Violation (NOV) or NOE was issued.

The City of Dallas was authorized to access the Site on December 11, 2020 through a Final Agreed Judgment. Following this, the City completed remedial planning and began site preparation efforts on December 14, 2020 when formal control of the Site was granted by the property owner. As part of the approved efforts to remove staged shingle material and related debris, Modern was asked to complete due diligence in the form of a Phase I Environmental Site Assessment (ESA) and subsequent Phase II Site Investigation. Above-grade shingle material was removed between December 2020 and February 2021 with additional subsurface material (e.g., shingle material mixed with soil) removal between February and May 2021. An estimated 152,000 tons of material was removed from the Site.

After completing the removal of shingles and related material, the City became the property owner. During due diligence efforts it was confirmed the shallow soil at the Site exhibited localized areas with elevated lead concentrations. To prepared for redevelopment of the Site, additional investigation is underway to aid closure in the Texas Voluntary Cleanup Program (VCP).