

AIR NSR_102911385-142557_PA_20140912_SITE REVIEW_1351361_
Texas Commission on Environmental Quality
Investigation Report

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Customer: Keith Industries, Inc.
Customer Number: CN605223932

Regulated Entity Name: KEITH INDUSTRIES

Regulated Entity Number: RN102911385

Investigation # 1351361

Investigator: SETH TATE

Conducted: 09/12/2016 -- 09/12/2016

Program(s): AIR NEW SOURCE PERMITS

Investigation Type: Site Assessment File Review

Additional ID(s): 142557

Incident Numbers

Site Classification MINOR SOURCE

SIC Code: 3479

NAIC Code: 332812

SIC Code: 1381

Location: INTERSECTION FM 521 AND FM 1462

Address: 20701 FM 521 RD,
ROSHARON, TX , 77583

Local Unit: REGION 12 - HOUSTON

Activity Type(s): PMSI116IH - AIR PMSI116IH - IN
HOUSE CH 116 PERMIT SITE
REVIEW

Principal(s):

Role	Name
RESPONDENT	KEITH INDUSTRIES INC

Contact(s):

Role	Title	Name	Phone
REGULATED ENTITY CONTACT	CONSULTANT	PAUL HAMILTON	Work (281) 437-7285

Other Staff Member(s):

Role	Name
QA Reviewer	AMY MESSICK
Supervisor	AMY MESSICK

Associated Check List

<u>Checklist Name</u>
AIR PERMIT SITE REVIEW

<u>Unit Name</u>
Sitewide

Investigation Comments:

INTRODUCTION / INVESTIGATION SUMMARY

Introduction

On September 6, 2016 the Texas Commission on Environmental Quality (TCEQ) Houston Regional Office received a Request for Comments (RFC) from the TCEQ Air Permits Division (APD) for Standard Permit # 142557 for Keith Industries, Inc. (APD Project No. 257892).

RECEIVED

JUN 27 2017

TCEQ
CENTRAL FILE ROOM

KEITH INDUSTRIES - ROSHARON

9/12/2016 Inv. # - 1351361

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Narrative

On September 12, 2016, Mr. Seth Tate of the TCEQ conducted an in-house review of the draft new permit for Standard Permit # 142557.

A response was sent to the permit writer via e-mail on September 12, 2016. A copy of the response can be found in Attachment 1.

Exit Interview

An exit interview with Keith Industries, Inc. was not conducted during this permit review process.

GENERAL FACILITY AND PROCESS INFORMATION

Process Description

Keith Industries performs abrasive blasting for piping and other metal surfaces.

BACKGROUND

Current Enforcement Actions

Comments from regional staff regarding current enforcement actions are included in Attachment 1, if applicable.

Agreed Orders, Court Orders, and Other Compliance Agreements

Comments from regional staff regarding Agreed Orders, Court Orders, and other Compliance Agreements are included in Attachment 1, if applicable.

Complaints

Comments from regional staff regarding any complaints are included in Attachment 1, if applicable.

Prior Enforcement Issues

Comments from regional staff regarding any prior enforcement issues are included in Attachment 1, if applicable.

ADDITIONAL INFORMATION / RECOMMENDATIONS

Conclusions and Recommendations

Comments from regional staff regarding applicability and enforceability are included in Attachment 1.

Additional Issues

Additional issues are included in Attachment 1, if applicable.

List of Report Attachments

1. Request for Comments Form sent from APD.

No Violations Associated to this Investigation

Signed


Environmental Investigator

Date

9/13/16

Signed


Supervisor

Date

9/13/16

Attachments: (in order of final report submittal)

___ Enforcement Action Request (EAR)

___ Letter to Facility (specify type) : _____

___ Investigation Report

___ Sample Analysis Results

___ Manifests

___ Notice of Registration

___ Maps, Plans, Sketches

___ Photographs

___ Correspondence from the facility

☒ Other (specify) :

SEE REPORT ATTACHMENTS

- Attachment 1, RFC Documents from APD
 - RN102-911-385
 - Keith Industries, Inc.
 - September 12, 2016

**Permit By Rule
Request for Comments -- Site Review
TCEQ New Source Review Program**

REGIONAL OFFICES: This notice is being sent to all programs with jurisdiction over the proposed site as noted below. Please return comments ASAP, but no later than the comments deadline which is **10 days** from the submittal date. Permit by rule disposition will proceed after comments are received. If a local program has assumed the responsibility of responding to this notice, you must respond to this notice informing Air Permits Division of who is responsible for the RFC reply.

LOCAL PROGRAMS: This Request for Comment is being sent to all applicable local programs. Please coordinate site review with the TCEQ Regional Office.

To Region: 12	City: Rosharon	County: Brazoria
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Date Request Submitted: September 6, 2016

Comments deadline is 10 calendar days from the date request submitted.

Date Application Received by Air Permits Initial Review Team: August 29, 2016

EXEMPTION TYPE

Permit by Rule No. 106.452	Division: APD General/Standard Rule Permit
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Permit No.: 142557	TCEQ Account No.:
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Regulated Entity No.: RN102911385	Customer No.: CN605223932
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Company Name: Keith Industries, Inc.

Site Name: Keith Industries	City: Rosharon	County: Brazoria
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Location: 20701 FM 521 Rd

Unit Name: Keith Industries

Plant Contact: Paul Hamilton	Phone: (281) 437-7285
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Local Program: ☒ Yes ☐ No Local Programs: Brazoria

Note: For sites in a region that has a local program with jurisdiction, MSS projects for those sites will be reviewed by TCEQ Regional Offices only.

Project No.: 257892

PLEASE SEND COMMENTS TO THE PERSON IDENTIFIED BELOW. (To avoid delays, please do not send this back to the Air Permits Initial Review Team.):

To: Rule Registration Section	E-Mail: AirRR@tceq.texas.gov	Phone: (512) 239-1250	Fax: (512) 239-2101
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Investigation Type: PM SI
Air Account NO: RN 102911385
Attachment: 1
Page 1 **of** 2

From Region: 12	County: Brazoria	City: Rosharon
Comments Deadline:	Date RFC Received:	
Company Name: Keith Industries, Inc.		
TCEQ Account Number:		
Permit No.: 142557	Project No. 257892	
Copy of Registration Received by Your Office: <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Date Received: (If not received, please contact company representative listed above for copy)		
Site Visit? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		Date of Investigation:
Investigator's Name (Please Print): Seth Tate		
Organization: TCEQ - Region 12	Phone: 713-767-3619	
Is the site review being conducted by City or County Local Program?		<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
If "Yes," name of Local Program:		Investigation Type: <u>PM 51</u>
SITE INFORMATION:		Air Account NO: <u>RN102-911-385</u>
Nuisance/Odor Potential: <input checked="" type="checkbox"/> Low <input type="checkbox"/> Moderate <input type="checkbox"/> High		Attachment: <u>1</u>
Type of Material to be Handled: Sand Blasting Media		Page <u>2</u> of <u>2</u>
Surrounding Land Use: Agricultural with 1 industrial site North of the facility		
School within 3000 feet? <input checked="" type="checkbox"/> No <input type="checkbox"/> Yes Name of School:		
Distance to Nearest Off-Property Receptor: ~200 ft if East of main building & ~548 ft. if performed in southern portion of land.		
Receptor Type: <input type="checkbox"/> School <input checked="" type="checkbox"/> Residence <input type="checkbox"/> Other (explain):		
Describe area surrounding nearest receptor: Agricultural		
Distance from unit to nearest property line: 165 ft if East of main building 72 ft if performed in southern portion of land		
Does the request for this PBR registration have a distance requirement?: <input type="checkbox"/> No <input checked="" type="checkbox"/> Yes		
Does the proposed site meet the distance requirement of the PBR?: <input type="checkbox"/> No <input type="checkbox"/> Yes		
SITE REVIEW:		
In light of the proximity of sensitive receptors and the surrounding land use, please discuss any concerns you have concerning a facility of this type locating at the proposed site.		
Depending on the location of the sand blasting, it can meet the distance requirements.		
The following MSS activities in the application are insufficient or inconsistent with our knowledge of MSS at the facility, and why: N/A		
The following activities are typically considered planned MSS and are not found in the registration. These activities should be added or addressed: N/A		
RECOMMENDED ACTION:		
Proceed with Air Permits Division Review <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No		
Deny for following reasons: N/A		
Investigator Name/Phone Number/Email: Seth Tate/713-767-3619/Seth.Tate		Date: 09/12/16
Section Manager Name/Phone Number/Email: Amy Messick/713-767-3745/Amy.Messick		Date: 09/12/16
Date Comments Returned to Air Permits Division: 09/12/2016		