Attachment #1

AIR PERMIT

FOLDER LEVEL

AIR PA #: 104011762   070363

File Type: PERMITS

Volume: 001

Inclusive Dates: 1/1/2003 - 12/31/2004

Media Code/ Form   ☐ Microfiche

☒ Roll Microfilm

☒ Electronic Image

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Box Barcode:

Please complete with typewriter or black pen.

Call to: _____   Call from: _____

Date of call: _____   File no.: _____

Phone no.: (_____) _____   Subject: _____

Ashland Inc — 102232

Information for file: _____

√ 11-13-03

Reg RN #

Signed _____

TNRCC-0225 (Rev. 09-01-93)

TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

Protecting Texas by Reducing and Preventing Pollution

December 15, 2003

Mr. Rick Gentry
Project Manager
Ashland, Inc.
5200 Blazer Parkway
Dublin, Ohio 43017

Re: Permits by Rule Registration Number: 70363
     Former Valvoline Facility (LPST No. 98876)
     Mobile Dual Phase Extraction (MPDE)
     Dallas, Dallas County
     Regulated Entity Number: RN104011762
     Customer Reference Number: CN600390801

Dear Mr. Gentry:

This is in response to your Form PI-7, entitled "Registration for Permits by Rule" concerning the conduction of a MDPE event to take place at 2537 Butler Street, in Dallas, Dallas County, Texas. We understand that EnVac Environmental Services, L.L.C., on behalf of Ashland, Inc., will conduct the MDPE event to remove phase-separated hydrocarbons and associated subsurface hydrocarbon vapors. Extracted vapors will be incinerated in a thermal oxidizer that has a destruction efficiency rating of 99 percent. Benzene emissions are expected to be below 0.009 pound per hour (lb/hr) and total petroleum hydrocarbon emissions will be below one lb/hr.

After evaluation of the information which you have furnished, we have determined that your construction is authorized under Title 30 Texas Administrative Code § 106.533 (30 TAC § 106.533) if constructed and operated as described in your registration request. This permit by rule was authorized by the Texas Commission on Environmental Quality (TCEQ) pursuant to 30 TAC Chapter 106.

A copy of the permit by rule in effect at the time of this registration is enclosed. You must construct facilities in accordance with the version of the permit by rule in effect when construction actually begins [see 30 TAC § 106.4(a)(5)]. After completion of the construction, the facility shall be operated in compliance with all the applicable conditions of the claimed permit by rule and 30 TAC § 106.4.

Re: Permits by Rule Registration Number: 70363

You are reminded that regardless of whether a permit is required, these facilities must be in compliance with all rules and regulations of the TCEQ and of the U.S. Environmental Protection Agency at all times.

Please reference the regulated entity number (RN), customer reference number (CN), and permit number noted in this document in all your future correspondence for the referenced facility or site. The RN replaces the former TCEQ account number for the facility (if portable) or site (if permanent). The CN is a unique number assigned to the company or corporation and applies to all facilities and sites owned or operated by this company or corporation.

Your cooperation in this matter is appreciated. If you have any questions concerning this permit by rule, please contact Ms. Jennifer Pfeil at (512) 239-4335 or write to the Texas Commission on Environmental Quality, Office of Permitting, Remediation, and Registration, Air Permits Division (MC-163), P.O. Box 13087, Austin, Texas 78711-3087.

Sincerely,

Anne M. Inman, Manager
General/Standard/Rule (GSR) Permit Section
Air Permits Division
Texas Commission on Environmental Quality

AMI/JLP/rc

Enclosure

cc: Mr. David Miller, Section Manager, Air Pollution Control Program, City of Dallas
        Environmental and Health Services, Dallas
      Mr. Tony L. Walker, Air Section Manager, Region 4 - Fort Worth
      Ms. Terri West, URS, Project Manager, Dallas, TX 75234
      Mr. Brian Burgess, EnVac Environmental Services, L.L.C. Tulsa, Ok 74133

Project Number: 102232

Registration #:	70363	Project #:	102232	APD Reviewer:	Ms. Jennifer Pfeil
Company Name:	Ashland, Inc.	Facility Name:	Former Valvoline Facility - Mobile Dual Phase Extraction (MDPE)	PBR(s) Claimed:	106.533

City:	Dallas	County:	Dallas	Date Assigned:	November 24, 2003
Reg Entity #	RN104011762	Assoc Permit #s	None	Date Received	November 10, 2003
Primary Contact Name/Title:	Mr. Rick Gentry Project Manager	Phone #	(614) 790-4302	Fax #	(614) 790-6232.
Technical Contact Name/Title:	Ms. Terri West Project Manager URS Corporation	Phone #	972-406-6998	Fax #	972-406-6951

GENERAL RULES CHECK:	YES	NO	DESCRIBE WHICH/HOW REQUIREMENTS ARE MET IF NEEDED
Is each PBR ≤ 25/250 tpy?	X		
Are PBR sitewide emissions > 25/250 tpy? (PN)		X	
Are there permit limits on using PBRs at site?		X	
Is PSD/Nonattainment netting required?		X	
Is FCAA §112g review required? (10/25 tpy)		X	
Do NSPS/NESHAPS/MACT Standards apply?		X	
Does NOx Cap and Trade apply to this PBR?		X	
Is the facility in compliance with all other applicable rules and regulations?	X		
Is this facility located at a Title V major site?		X	
Are grandfathered facilities involved with this Registration?		X	
Was the appropriate fee paid? (Eff. 11/01/02)		X	No fee required (LPST No. 98876)

OVERALL SITE / UNIT DESCRIPTION:
Leaking Petroleum Storage Tank (LPST) site at 2537 Butler Street, Dallas, Dallas County, Texas

PROJECT SOURCES / FACILITIES, PBRS CLAIMED, APPLICABLE STANDARDS, EMISSIONS AND CONTROL SUMMARY:
The company represents that all of the requirements of 106.533 are met. EnVac Environmental Services, LLC, on behalf of Ashland, Inc., will conduct the MDPE events at the above mentioned facility to remove phase-separated hydrocarbons and associated subsurface hydrocarbon vapors. Recovered fluids will be replaced in appropriate storage containers prior to off-site disposal, while the extracted hydrocarbon vapors will be treated in a high temperature thermal oxidizer that has a destruction efficiency rating of 99.5 %. During the high vacuum multi-phase extraction (HVME), EnVac will be responsible for site professionals to monitor and report fundamental data such as, time, air flow-rates, temperature, and vapor concentration approximately every 30 minutes. A summary field data report will be provided by EnVac for each HVME event that is conducted at this site. Emissions of benzene are estimated to be 0.0099 pound per hour, and the total petroleum hydrocarbon emissions will be below one pound per hour.

Distance Limitations (if applicable)

Site Review/Distance Limits	Yes	No	Description/Outcome	Date	Reviewed by
Site Review Required?		X		12/5/03	Ms. Jennifer Pfeil
PBR Distance Limits Met?	X			12/5/03	Ms. Jennifer Pfeil

Compliance History:

	Yes	No
Does this registration require a 30 TAC 60 review?		X

In accordance with 30 TAC Chapter 60, a compliance history report was reviewed on:

The compliance period was   from   to

Site rating & classification?   Company rating & classification?

Registration #:	70363	Project #:	102232	APD Reviewer:	Ms. Jennifer Pfeil
Company Name:	Ashland, Inc.	Facility Name:	Former Valvoline Facility - Mobile Dual Phase Extraction (MDPE)	PBR(s) Claimed:	106.533

If site was Poor, what action(s) occurred as a result? (i.e. changes to permit, reduced renewal period, etc.)

Is the PBR recommended to be denied or has the permit changed on the basis of compliance history or rating?   NO

Review Summary: **Yes**   **No**   **If no, describe**

Are all general and specific applicable rule conditions satisfied?   X

Accept Claim for Registration?   X

	Technical Reviewer	**Peer Review**	**Team Leader/Manager**
Name/Signature:	Ms. Jennifer Pfeil Points: 1.0	*Sid Wheeler* *Peer ReviewPoints: 010*	*Clyde Price* *Points: 1.0*
Date:	December 10, 2003	*December 11, 2003*	*December 11, 2003*

11/14/2003 -------------- NSR PERMITS IMS- PROJECT RECORD --

PROJECT#: 102232   PERMIT#: **70363**   STATUS: **P**   DISP CODE: _____

RECEIVED: **11/10/2003**   PROJTYPE: **XRVW**   RENEWAL: ISSUED DATE: _____

FEE DATE: FEE AMT: $ 0   STDX1/SP: 533   SUP-DISP DATE: _____

GROUP: PAR

PARSTAFF1: SLADEK, KIMBERLY &

PARSTAFF2: BARTLEY, LUCY

GROUP: ART

TECHENGR : SWOR, CINDY

ADMIN REVIEW

A - PAR RECEIVED :   11/10/2003   A - PAR TRANSFER TO APD :   11/14/2003   A - CENTRAL REGISTRY UPDATED :   11/14/2003

ISSUED TO: ASHLAND INC
COMPANY NAME: ASHLAND INC
CUSTOMER REGISTRY ID: **CN600390801**
PRIMARY CONTACT INFORMATION
CONTACT TYPE: RESPONSIBLE OFFICIAL
NAME: MR RICK GENTRY   TITLE: PROJECT MANAGER
PHONE: 614-790-4302 ext   FAX: 614-790-6232 ext
STREET: 5200 BLAZER PKWY   CITY/STATE,ZIP: DUBLIN, OH , 43017-

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PROJECT INFORMATION
UNIT: FORMER VALVOLINE FACILITY

SIC: 0   REGION: 4   ACCOUNT: REG ENTITY ID: **RN104011762**

SITE NAME: ASHLAND DALLAS
COUNTY: DALLAS   CAPUNITS: UNITTYPE:
CAPACITY: CITY: DALLAS
LOCATION: 2537 BUTLER ST

PUBLIC NOTICE
PUBLIC NOTICE REQUIRED?:   PN1 ALT LANGUAGE: NO   PN2 ALT LANGUAGE: NO

EMISSION RATES

TONS/YR REDUCTION	NOX	CO	VOC	PM	SO2	OTHER	TOTAL

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NOV 1 8 2003

PROJECT NOTES
ADMINISTRATIVE: SOS #1112306

AIR PERMITS DIVISION

TECHNICAL ACTIVITY HISTORY

TR - ENGINEER RECEIVE PROJECT :   FA - PROJECT ISSUED :   SUP - RECEIVED FROM PAR :   11/21

TR - PROJECT TO   TR - SUP/MANGR   TR - INITIAL REVIEW

From: Judy Mottern
To: Lucy Bartley
Date: 11/13/03 4:28PM
Subject: Project Number 102232

Customer: Ashland Inc CN600390801
Regulated Entity: Ashland Dallas RN10401762

Lucy, I added Dallas to this RN name because there are other Ashland RN's. This way we can identify it quickly. If this is not ok, just let me know and I will remove the Dallas.

If you have any questios, please call me.

Thanks,
Judy
x5328

PERMIT ADMIN REV.   5122392123   O

** Transmit Conf.Report **

P.1   Nov 13 2003   9:57

Fax/Phone Number	Mode	Start	Time	Page	Result	Note
5181	NORMAL	13, 9:57	0'33"	3	# O K	

FAX TRANSMITTAL

DATE   November 13, 2003   NUMBER OF PAGES *(including this cover sheet)*:   3

TO: Name   Central Registry

         Organization   *Attention: Central Registry*

         FAX Number   (512) 239-5181

FROM: TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

         Name   Lucy Bartley

         Division/Region   Air and Waste Applications Team,
                           Permits Administration Review Section

         Telephone Number (512) 239-5325

         FAX Number   (512) 239-4500

Check Box	
New Cust.	
New Reg Ent	✔

Check Box	
Update Customer	✔
Update Regulated Entity	
New Affiliation	
New Reg/Permit #	✔

Portable	

Attached is a CORE Data form or print out of CR Data. Please update Central Registry with the information on the form provided.

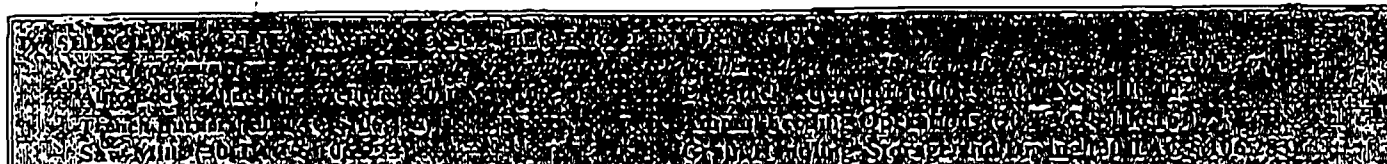| Company Name:	Ashland Inc
	Assumed Name: different than SOS Legal Name. Legal Name for TCEQ.
	Legal Name: Research shows name on CDF is Legal Name, not name currently in SOS.

TCEQ

Protecting Texas
by Reducing and
Preventing Pollution

TCEQ

Texas Commission on Environmental Quality
REGISTRATION FOR PERMITS BY RULE
FORM PI-7

I. REGISTRANT INFORMATION

A. Is a TCEQ Core Data Form (TCEQ Form No. 10400) attached? ☒ YES ☐ NO *If "NO," please indicate the following*

TCEQ Customer Reference Number	CN -600390801	TCEQ Regulated Entity Number:

B. Company or Other Legal Customer Name *(must be same as Core Data "Customer")*: Ashland Inc.

Company Official Contact Name:	Mr. Rick Gentry	Title:	Project Manager

Mailing Address: 5200 Blazer Parkway

City:	Dublin	State: OH	Zip Code:	43017
Phone:	614-790-4302	Fax: 614-790-6232	E-mail:	RGentry@Ashland.com

C. Technical Contact Name: Terri West Title: Project Manager

Company: URS Corporation

Mailing Address: 3010 LBJ Freeway Suite 1300

City:	Dallas	State: TX	Zip Code:	75234
Phone:	972-406-6998	Fax: 972-406-6951	E-mail:	Terri_West@urscorp.com

1. **Facility Location** Information Street Address: 2537 Butler Street

If no street address, provide written driving directions to the site: *(attach description if additional space is needed)*

City:	Dallas	County:	Dallas	Zip Code:	75235

II. FACILITY AND SITE INFORMATION

A. Name and Type of Facility: Former Valvoline Facility ☒ PERMANENT ☐ PORTABLE

B. Permits by Rule (PBR) claimed under 30 TAC § 106 *(List all)*: §106. 533 ____, ____, ____, ____

C. Are you registering a grandfathered facility? *If "YES," attach documentation of construction date.* ☐ YES ☒ NO

D. Is there a previous Standard Exemption (SE) or PBR for the facility in this registration? *(Attach details regarding changes)* ☐ YES ☒ NO	Registration No.:
	Rule No.:

E. Are there any **other facilities** at this site which are **authorized** by an air SE or PBR? ☐ YES ☒ NO	Registration No.:
	Rule No.:

F. Are there any **other air preconstruction permits** at this site? ☐ YES ☒ NO Permit Nos.:

G. Is this site required to obtain an air federal operating permit? ☐ YES ☒ NO Permit Nos.:

RECEIVED

H. TCEQ Account Identification Number *(if known)*:

NOV 1 0 2003

III. FEE INFORMATION

Air & Waste Applications Team

A. Is a fee required? *If "YES," to any of the following questions, a fee is not required and skip to Section IV If all answers are "NO," go to question B.*

Is this registration an update to a previously registered facility and accompanied by a Certification Form solely to establish a federally enforceable emission limit?	☐ YES	☒ NO

Is this registration for a remediation project which is reimbursable by the TCEQ or is part of an action with the Voluntary Cleanup Program or federal Superfund program ?	☒ YES ☐ NO	LPST/VCP/SF No.: 098876

Texas Commission on Environmental Quality
REGISTRATION FOR PERMITS BY RULE
FORM PI-7

Does this business have less than 100 employees?	☐ YES	☐ NO
Does this business have less than 1 million dollars in annual gross receipts?	☐ YES	☐ NO
Is this registration submitted by a governmental entity with a population of less than 10,000?	☐ YES	☐ NO
C. Check/Money Order/Transaction No.: Name on Check: For Amount:		

A. Is the required TCEQ checklist attached which shows the facility meets all general and specific requirements of the PBR(s) being claimed? (www.tnrcc.state.tx.us/permitting/airperm/nsr_permits/exempt.htm)   ☒ YES   ☐ NO

B. Distance from this facility's emission release point to the nearest property line: 120 Feet

Distance from this facility's emission release point to the nearest off-property structure: 500 Feet

Registrants must...

A. Is confidential information submitted and properly marked with this registration?   ☐ YES ☒ NO

B. Is a process flow diagram or a process description attached?   ☒ YES ☐ NO

C. Are emissions data and calculations for this claim attached?   ☒ YES ☐ NO

D. Is information attached showing how the general requirements (30 TAC § 106.4) of the PBR is met for this registration? (PBR checklists are optional - www.tnrcc.state.tx.us/permitting/airperm/nsr_permits/exempt.htm)   ☒ YES ☐ NO

Are you aware that if the facilities listed in this registration are subject to the Mass Emissions Cap & Trade program under 30 TAC Chapter 101, Subchapter H, Division 3, the owner/operator of these facilities must possess NO_x allowances equivalent to the actual NO_x emissions from these facilities?   ☐ YES ☐ NO ☒ N/A

E. Is information attached showing how the specific PBR requirements are met for this registration? (PBR checklists are optional - www.tnrcc.state.tx.us/permitting/airperm/nsr_permits/exempt.htm)   ☒ YES ☐ NO

F. Distance from this facility's emission release point to the nearest property line: 120 Feet

Distance from this facility's emission release point to the nearest off-property structure: 500 Feet

Note: In limited cases, a map or drawing of the site and surrounding land use may be requested during the technical review or at the request of the TCEQ Regional Office or local air pollution control program during an investigation.

The signature below indicates that I have knowledge of the facts herein set forth and that the same are true and correct to the best of my knowledge and belief. I further state that to the best of my knowledge and belief, the facility will satisfy the conditions and limitations of the indicated permit by rule. The facility will operate in compliance with all regulations of the Texas Commission on Environmental Quality and with federal U.S. Environmental Protection Agency regulations governing air pollution.

NAME: Rick Gentry   SIGNATURE: *[signature]*   DATE: 11/7/2003

TCEQ - 10228 (Rev. 5-1-2003)   NOV 10 2003 Page 3 of 4
PI-7 Form - This form is for use by sources subject to air quality permit requirements and may be revised periodically. [NSRC: 6910.2]

NOV 07 2003 17:39

Air & Waste Applications Team
** TOTAL PAGE.02 **

TNRCC Core Data Form

If you have questions on how to fill out this form or about our Central Registry, please contact us at 512-239-5175.

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 us at 512-239-3282.

SECTION I: General Information

1. Reason for Submission *Example: new wastewater permit; IHW registration; change in customer information; etc.*
Remediation Pilot Study Test

2. Attachments	Describe Any Attachments: *(ex: Title V Application, Waste Transporter Application, etc.)*
☒ Yes ☐ No	

3. Customer Reference Number *if Issued*	4. Regulated Entity Reference Number *if Issued*
CN 60039080/ (9 digits)	(9 digits)

SECTION II: Customer Information

5. Customer Role *(Proposed or Actual)* — As It Relates to the Regulated Entity Listed on This Form

Please check one of the following: ☐ Owner ☐ Operator ☐ Owner and Operator
☐ Occupational Licensee ☒ Volunteer Cleanup Applicant ☒ Other: **T1802**

6. General Customer Information
☐ New Customer ☐ Change to Customer Information ☐ Change in Regulated Entity Ownership ☒ No Change*
*If "No Change" and Section I is complete, skip to Section III - Regulated Entity Information.

7. Type of Customer: ☐ Individual ☐ Sole Proprietorship - D.B.A. ☐ Partnership ☒ Corporation
☐ Federal Government ☐ State Government ☐ County Government ☐ City Government
☐ Other Government _____ ☐ Other _____

8. Customer Name *(If an individual, please print last name first)* If new name, enter previous name:
Ashland Inc.

9. Mailing Address: **5200 Blazer Parkway**

City	State	ZIP	ZIP + 4
Dublin	**OH**	**43017**	

10. Country Mailing Information *if outside USA*	11. E-Mail Address *if applicable*

12. Telephone Number	13. Extension or Code	14. Fax Number *if applicable*
(614)790-4302		**(614)790-6232**

15. Federal Tax ID *(9 digits)*	16. State Franchise Tax ID Number *if applicable*	17. DUNS Number *if applicable* *(9 digits)*
610122250		**5003264**

18. Number of Employees	19. Independently Owned and Operated?
☐ 0-20 ☐ 21-100 ☐ 101-250 ☐ 251-500 ☒ 501 and higher	☐ YES ☒ NO

SECTION III: Regulated Entity Information

20. General Regulated Entity Information
☒ New Regulated Entity ☐ Change to Regulated Entity Information ☐ No Change*
*If "No Change" and Section I is complete, skip to Section IV - Preparer Information **RECEIVED**

21. Regulated Entity Name *(If an individual, please print last name first)*
Ashland Inc.

NOV 10 2003

22. Street Address:	2537 Butler St.			
(No P.O. Boxes)				
	City Dallas	State TX	ZIP 75235	ZIP + 4

23. Mailing	5200 Blazer Parkway			
Address				
	City Dublin	State OH	ZIP 43017	ZIP + 4

24. E-Mail Address: RGentry@Ashland.com

25. Telephone Number (614)790-4302	26. Extension or Code	27. Fax Number *if applicable* (614)790-6232

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

32. What is the Primary Business of this entity? *(Please do not repeat the SIC or NAICS description.)*
Former Valvoline Facility

Questions 33 - 37 address geographic location. Please refer to the instructions for applicability.

33. County: Dallas

34. Description of Physical Location
Located on Butler Street at the corner of Denton Drive and Butler Street.

35. Nearest City Dallas		State TX	Nearest ZIP 75235

36. Latitude (N)			37. Longitude (W)		
Degrees	Minutes	Seconds	Degrees	Minutes	Seconds
32	49	13	96	49	58

38. TNRCC Programs In Which This Regulated Entity Participates *Not all programs have been listed. Please add to this list as needed. If you don't know or are unsure, please mark "unknown."*

☐ Animal Feeding Operation	☒ Petroleum Storage Tank	☐ Water Rights
☐ Title V – Air	☒ Wastewater Permit	☒ **Corrective Action Program**
☐ Industrial & Hazardous Waste	☐ Water Districts	☐ _____
☐ Municipal Solid Waste	☐ Water Utilities	☒ Unknown
☐ New Source Review - Air	☐ Licensing - TYPE(s) _____	

SECTION IV: Preparer Information

39. Name Terri West	40. Title Project Manager

41. Telephone Number (972)406-6998	42. Extension or Code	43. Fax Number *if applicable* (972)406-6951

44. E-Mail Address: Terri_West@urscorp.com

URS

Facsimile

To: Permits Administrative Review

Firm: TCEQ, Permits Administrative Review

Facsimile: 512-239-2123

From: Terri West

Date: 11/10/03

Page 1 of:

Subject: Form PI-7, Core Data, Attachments
2537 Butler Street Dallas, TX.

Message:

Attached please find PI-7 Form, Data Form, and required attachments for 2537 Butler Street, Dallas, TX.

Should you have questions please call me at 972-406-6998!

Thank-you,
Terri West

RECEIVED

NOV 10 2003

Air & Waste Applications Team

CC:

URS Corporation
3010 LBJ Freeway, Suite 1300
Dallas, TX 75234
Tel: 972.406.6950
Fax: 972.406.6951
www.urscorp.com

TEXAS NATURAL RESOURCE CONSERVATION COMMISSION (TNRCC)

New Source Review Permits (NSRP) Division

EXEMPTIONS FROM PERMITTING - APPLICABILITY CHECKLIST
30 TAC CHAPTER 106, SECTION 106.4

This checklist is effective as of May 1, 1998.

General Instructions & Guidance

This checklist is designed to help owners/operators confirm that their proposed project meets the rules for using exemptions from permitting. In addition to this checklist, it is the responsibility of the owner/operator to document and submit information on how the facility equipment and operations will meet all of the requirements of each specific exemption being claimed. Please forward this completed form and all documentation to the TNRCC for verification of your exemption claim.

Before starting the checklist, please calculate all new emissions associated with this project, including fugitives, as well as upstream and downstream increases in emissions caused by the facilities added or modified by the exemption claim. Attach this information to the completed exemption claim. Note: 30 TAC 116.116(e) may authorize some of the upstream and downstream emissions associated with the exemption claim, however these emissions calculations are required for federal significance determination. Clearly describe 116.116(e) actions in the exemption process description and include these emissions for the federal applicability questions below.

Please complete and submit only the appropriate pages of this checklist with the exemption claim:

Title	Details
General Instructions & Guidance...........................	*Do not return*
Federal Applicability Reference Information.............	*Do not return*
General Requirements of §106.4 (short form)............	*Complete for all exemption claims*
More Requirements of §106.4	*Complete for all exemption claims where the answer to Question E of the General Requirements is "No"*
Houston/Galveston Nonattainment Applicability.........	*Complete if the facilities are to be located in Brazoria, Chambers, Ft. Bend, Galveston, Harris, Liberty, Montgomery, or Waller County and have VOC or NOₓ emissions*
Dallas/Ft. Worth Nonattainment Applicability...........	*Complete if the facilities are to be located in Collin, Dallas, Denton or Tarrant County and have VOC emissions*
Beaumont/Port Arthur Nonattainment Applicability....:	*Complete if the facilities are to be located in Hardin, Jefferson or Orange County and have VOC or NOₓ emissions*
El Paso Nonattainment Applicability.......................	*Complete if the facilities are to be located in El Paso County and have VOC, NOₓ, CO or PM₁₀ emissions*
PSD Applicability..	*Complete for all exemption claims where the answer to Question E of the General Requirements is "No". Please note that if the facility is located in a non-attainment area for VOCs, CO or PM10, you do not have to review that contaminant again for PSD Applicability.*

Easy Reference:

VOC	volatile organic compounds	Contaminant	Includes all criteria pollutant categories
NOₓ	nitrogen oxides	TPY	tons per year
SO₂	sulfur dioxide	NAAQS	National Ambient Air Quality Standards
CO	carbon monoxide	PSD	Prevention of Significant Deterioration
PM	suspendable particulate matter, including PM₁₀	Nonattainment	Areas designated by EPA as not meeting the NAAQS for a particular contaminant
PM₁₀	PM less than 10 microns in size	Attainment	Areas designated as meeting the NAAQS for a particular contaminant

After completing this checklist, attach all documentation needed to verify your claim and forward to all of the following:

NSRP Division, MC162
TNRCC
P.O. Box 13087
Austin, TX 78711
FAX (512) 239-1300

Appropriate TNRCC Regional Office #1 - 15
Air Program Manager
(see listings for addresses & Fax #s)

Any appropriate Local Air Pollution
Control Programs (see listings)

If you have any questions regarding this checklist, applicable requirements, or the exemption registration process, please feel free to call the TNRCC NSRP Division at (512) 239-1250.

RECEIVED

NOV 10 2003

Air & Waste Applications Team

Nonattainment Major Source and Modification Definitions

Areas & Counties	Ozone Category	Contaminant	Major Source	Netting* Trigger	Major Modification	Offset Ratios	
Houston/Galveston	Severe	VOC	25 tpy	5 tpy	25 tpy	1.3 : 1	
Brazoria, Chambers, Fort Bend,		NO$_x$	25 tpy	5 tpy	25 tpy	1.3 : 1	
Harris, Galveston, Liberty,							
Montgomery, Waller							
Dallas/Ft. Worth							
Collin, Dallas, Denton, Tarrant	Serious	VOC	50 tpy	5 tpy	25 tpy	1.2 : 1	
Beaumont/Port Arthur	Moderate	VOC	100 tpy	5 tpy	40 tpy	1.15 : 1	
Jefferson, Orange, Hardin		NO$_x$	100 tpy	40 tpy	100 tpy	1.15 : 1	
El Paso	Serious	VOC	50 tpy	5 tpy	25 tpy	1.2 : 1	
		PM$_{10}$	100 tpy	15 tpy	15 tpy		
		CO	100 tpy	100 tpy	100 tpy		

*   *Only applicable if the site is already a major source*

PSD Named Source List

1. Fossil-fuel fired steam electric plants (>250 MMBtu/hr)
2. Coal cleaning plant with thermal dryers
3. Kraft pulp mills
4. Portland cement plants
5. Primary Zinc smelters
6. Iron and Steel mill plants
7. Primary aluminum ore reduction plants
8. Primary copper smelters
9. Municipal incinerators (> 250 tons refuse per day)
10. Hydrofluoric acid plants
11. Sulfuric acid plants
12. Nitric acid plants
13. Petroleum refineries
14. Lime plants
15. Phosphate rock processing plants
16. Coke oven batteries
17. Sulfur recovery plants
18. Carbon black plants (furnace process)
19. Primary lead smelters
20. Fuel conversion plants
21. Sintering plants
22. Secondary metal production plants
23. Chemical process plants
24. Fossil fuel boilers (>250 MMBtu/hr combined)
25. Petroleum storage and transfer units (>300,000 barrels)
26. Taconite ore processing plants
27. Glass fiber processing plants
28. Charcoal production plants

Significant Emission Rate Increases for PSD Review

Contaminant	Rate (TPY)	Contaminant	Rate (TPY)
CO	100	Sulfuric Acid mist	7
NO$_x$	40	Total Reduced Sulfur (TRS)	10
SO$_2$	40	Municipal Waste - organics	3.5×10^{-6}
PM$_{10}$	15	Municipal Waste - metals	15
VOC	40	Municipal Waste - acid gases	40
Lead (Pb)	0.6	Fluorides	3

Texas Natural Resource Conservation Commission: Regional Offices

No.	Region
1	**Amarillo:** 3918 Canyon Drive Amarillo, Texas 79109-4996 FAX: 806-358-9545
2	**Lubbock:** 4630 50th, Suite 600 Lubbock, 79414-3509 FAX 806-796-7107
3	**Abilene:** 209 S. Danville Drive Suite 200B Abilene, Texas 79605 FAX 915-692-5869
4	**Arlington:** 1101 East Arkansas Lane Arlington, Texas 76010-6499 FAX 817-469-6750
5	**Tyler:** 2916 Teague Tyler, Texas 75701 FAX 903-595-1562
6	**El Paso:** 7500 Viscount Blvd., Suite 147

No.	Region
	El Paso, Texas 79925 FAX 915-778-4576
7	**Midland:** 3300 North A St. Building A, Suite 107 Midland, Texas 79705-5404 FAX 915-570-4795
8	**San Angelo:** 301 West Beauregard Ave. San Angelo, Texas 76903 FAX 915-658-5431
9	**Waco:** 6801 Sanger Avenue Suite 2500 Waco, Texas 76710-7807 FAX 254-772-9241
10	**Beaumont:** 3870 Eastex Fwy., Suite 110 Beaumont, Texas 77703 FAX 409-892-2119
11	**Austin:** 1921 Cedar Bend, Suite 150

No.	Region
	Austin, Texas 78758 FAX 512-339-3795
12	**Houston:** 5425 Polk, Suite H Houston, Texas 77023-1423 FAX 713-767-3761
13	**San Antonio:** 140 Heimer Road, Suite 360 San Antonio, Texas 78202-5002 FAX 210-545-4329
14	**Corpus Christi:** Natural Resource Center 6300 Ocean Drive, Suite 1200 Corpus Christi, Texas 78412 FAX 512-980-3101
15	**Harlingen:** 134 East Van Buren, Suite 301 Harlingen, Texas 78550 FAX 210-412-5059

LOCAL PROGRAMS

Austin-Travis County Health Department
15 Waller Street
Austin, Texas 78702
FAX (512) 469-2030

City of Austin
P.O. Box 1088
Austin, Texas 78767
FAX (512) 499-2859

Brazoria County Health Department
436 East Mulberry
Angleton, Texas 77515
FAX (409) 849-0324

City of Carrollton Environmental Health
Department
P.O. Box 110535
Carrollton, Texas 75011-0535
FAX (972) 466-3175

City of Dallas Department of Health
and Human Services
320 E. Jefferson Street
Dallas, Texas 75203
FAX (214) 948-4426

El Paso City-County Health and Environmental
District
1148 Airways - Room 155
El Paso, Texas 79925
FAX (915) 771-5714

City of Farmers Branch Environmental Health
Office
P.O. Box 819010
Farmers Branch, Texas 75381-9010
FAX (972) 241-6305

Fort Worth Department of Environmental
Management
5000 MLK Freeway
Fort Worth, Texas 76119-4166
FAX (817) 871-5464

Galveston County Health District
P.O. Box 939
La Marque, Texas 77568
FAX (409) 938-2321

Harris County Pollution Control Department
P.O. Box 6031
Pasadena, Texas 77506
FAX (713) 475-8906

Houston Health and Human Services Department
7411 Park Place
Houston, Texas 77087
FAX (713) 640-4343

Irving Department of Health
P.O. Box 152288
Irving, Texas 75015-2288
FAX (972) 721-3634

City of Lewisville
P.O. Box 29002
Lewisville, Texas 75029-9002
FAX (972) 219-3414

City of Nacogdoches Environmental Health P.O.
Box 630648
Nacogdoches, Texas 75963
FAX (409) 560-5137

City of Richardson
P.O. Box 830309
Richardson, Texas 75083-0309
FAX (972) 644-2618

San Antonio Metropolitan Health District
332 West Commerce
San Antonio, Texas 78205
FAX (210) 207-8039

City of Sugar Land
P.O. Box 110
Sugar Land, Texas 77487-0110
FAX (281) 275-2771

City of Webster
311 Pennsylvania
Webster, Texas 77598
FAX (281) 332-5834

Wichita Falls-Wichita County Public Health
District
1700 Third Street
Wichita Falls, Texas 76301-2199
FAX (940) 761-7821

○   ○

Company Name: _Ashland, Inc._____Checklist completed by: __mm_____ Date:_____Facility
Type:_ Former Valvoline Facility_____Exemption(s) claimed: §106._____Project Description:

(including equipment, materials, and brief process description)

List the maximum annual emission rates, in **TONS PER YEAR (TPY)**, <u>for this project</u>:

CO :_____   NO $_x$: _____   PM :

SO $_2$:_____   VOCs: _____   Other: _____   _____

The following questions require a "Yes" or "No" answer to be indicated for this exemption claim:

A. §106.4(a)(5):   Current Exemption Requirements

Yes_X__ No__   Have you checked to determine if this exempt project is being claimed under the current version
of 30 TAC 106?
If "Yes", continue to next question
If "No", please contact the TNRCC NSRP Division for a copy of the current exemption to be claimed

B. §106.4(a)(7):   Exemption prohibition check

Yes__ No_X__   Are there any <u>air permits</u> under the same account containing permit conditions which prohibit
or restrict the use of standard exemptions?
If "No", continue to next question
If "Yes", exemptions may not be used or their use must meet the restrictions of the permit.
A new permit or permit amendment may be required. List permit number(s):_____.

C. §106.4(b):   Circumvention check
§106.4(b) states "No person shall circumvent by artificial limitations the requirements of §116.110 of this title (covering permitting)."
Circumvention by artificial limitations may include but is not limited to:
1. dividing a complete project into separate segments to circumvent §106.4(a)(1) limits;
2. claiming feed or production rates below the physical capacity of the project's equipment in order to begin constructing facilities
before a permit or permit amendment is approved for full scale operations, particularly when the unit will not be economically
viable at less than permitted capacity;
3. claiming a limited chemical list in order to begin constructing facilities before a permit or permit amendment is approved for
additional chemicals, particularly when the unit will not be economically viable until the additional chemicals are authorized.

Yes___ No___   Does your project meet any of the criteria listed above?
If "No", continue to next rule question
If "Yes", an exemption may not be claimed

D. §106.4(c) - (d): Compliance with all Rules

Yes_X__ No__   Will the facility comply with all rules and regulations of the TNRCC, the intent of the Texas
Clean Air Act, and any local permitting or registration requirements?
If "Yes", continue to next rule question
If "No", an exemption may not be claimed.

E. §106.4(a)(1): Emission limits check

Yes___ No___   The maximum emissions from <u>all</u> facilities at the site, including this exemption claim, are less
than 25 tpy of any contaminant.
If the answer to this questions is "Yes", no further review is needed to complete this checklist.
Forward all information needed to verify your exemption claim to the TNRCC.
If "No", please continue through the remaining applicable pages of the checklist.

Detailed §106.4 Requirements

F. §106.4(a)(1): Emission limits check continued....

1. Yes___ No___ Are SO_x, PM, VOC, and other emissions shown above each less than 25 TPY?
2. Yes___ No___ Are the NO_x and CO emissions shown above each less than 250 TPY?
   If the answer to either question is "No", an exemption cannot be claimed.
   If the answer to both questions is "Yes", continue to next rule question

G. §106.4(a)(4): Site exemption emissions *(For all exemptions at the property and/or under the same Account ID No.)*

1. Yes___ No___ Are <u>total</u> NO_x and CO emissions each less than 250 TPY?
2. Yes___ No___ Are <u>total</u> emissions of all other contaminants each less than 25 TPY?
   If the answer to both questions is "Yes", continue to next rule question
   If either question is answered "No" please answer the following:

3. Yes___ No___ Has any facility at the property had public notification and comment as required in 30 TAC 116
   (or applicable procedures of Chapter 116 in effect at the time)?
   If "Yes", please describe the associated permit action and when notice occurred:
   If "No", an exemption may not be claimed

H. §106.4(a)(6): Federal Requirements for NSPS & NESHAPs

1. Yes___ No___ Are any EPA New Source Performance Standards (NSPS) applicable to the facilities for which
   the exemption is being claimed?

2. Yes___ No___ Are any EPA National Emissions Standards for Hazardous Air Pollutants (NESHAPs)
   applicable to the facilities for which the exemption is being claimed?
   If "No", continue to next rule question
   If "Yes", Please list the applicable SubPart(s):
   Please attach a discussion of how the facilities will meet applicable standards.

I. §106.4(a)(2): Nonattainment checklists

1. Yes_X_ No___ The facility to be exempted is located in a nonattainment county? (See list pages 1 & 2)
   If "Yes", complete applicable pages of this checklist, then answer the next question
   If "No", continue to the PSD questions below
2. Yes___ No_X_ For any regulated nonattainment contaminant, has this project triggered a nonattainment
   review?
   If "No", continue to the PSD questions below
   If "Yes", the project is a major source or a major modification and an exemption may not be used.
   A Nonattainment Permit review must be completed to authorize the project.

J. §106.4(a)(3): Prevention of Significant Deterioration (PSD) checklist

Yes___ No___ For any regulated National Ambient Air Quality Standard (NAAQS) contaminant, has this
project triggered a PSD review? *(Please complete the last page of this checklist, then answer:)*
If "No", no further review is needed to complete the checklist for Chapter 106. Forward all information
needed to verify your exemption claim to the TNRCC.
If "Yes", the project is a major source and an exemption may not be used. A PSD Permit review must be
completed to authorize the project.

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§106.4(a)(3): Prevention of Significant Deterioration (PSD) checklist

Please note that If the facility is located in a non-attainment area for VOCs, CO or PM10, you do not have to be reviewed again for PSD Applicability for that contaminant.

The following questions require a "Yes" or "No" answer to be indicated for this exemption claim:

S. PSD Applicability check

Named Sources

1. Yes___ No_X_   Is the SITE a **named** PSD source? (See list on page 2 of checklist)
   - *If "No", continue to the un-named source questions (#4) below*
   - *If "Yes", please answer the following:*

2. Yes___ No___   Prior to this action, are site-wide emissions of any NAAQS regulated pollutant (including fugitives) greater than 100 TPY? (i.e. Is this site an existing major source?)
   - *If "Yes", the site is a major source. Please answer questions #6-8 below (PSD "Significance")*
   - *If "No", answer the next question*

3. Yes___ No___   For any regulated NAAQS contaminant (except as noted above), will the project's increases be greater than 100 TPY? (i.e. Is this project major?)
   - *If "No", no further review is needed to complete the checklist for Chapter 106.*
   - *If "Yes", the project is a major source and an exemption may not be used and a PSD Permit review must be completed to authorize the project.*

Un-named Sources

4. Yes_X_ No___   Is the SITE an **un-named** PSD source? (See list on page 2 of checklist)
   - *If "No", the above questions regarding named sources should be completed*
   - *If "Yes", please answer the following:*

5. Yes___ No_X_   Prior to this action, are site-wide emissions of any NAAQS regulated pollutant (point sources only) greater than 250 TPY? (i.e. Is this site an existing major source?)
   - *If "Yes", the site is a major source. Please answer questions #6-8 below (PSD "Significance")*
   - *If "No", no further review is required. Please send this checklist and all additional documentation to the TNRCC NSRP Division and the applicable Regional office.*

6. **PSD "Significance" check:**
   If the existing site is a major source, Complete the following chart and attach calculations to determine the project's emission increases for all regulated NAAQS compounds (in TPY).

		NO_x	PM_{10}	CO	VOCs	SO_2	Other: _____	Other: _____
New allowable rate	+	_____	_____	_____	_____	_____	_____	_____
Old actual rate**	-	_____	_____	_____	_____	_____	_____	_____
Project Increase	=	_____	_____	_____	_____	_____	_____	_____

7. Yes___ No___   For any regulated NAAQS contaminant, will the project's increases be greater than the PSD 'significant' rates? (i.e. Does this action trigger netting?) (See list on page 2 of checklist)
   - *If "No", no further review is needed to complete the checklist for Chapter 106.*
   - *If "Yes", PSD Applicability review and netting calculations must be completed (attach).*
   - *These netting calculations should be used to answer the following:*

8. Yes___ No___   For any regulated NAAQS contaminant, are the contemporaneous net increases greater than the PSD 'significant' rates? (i.e. Is this project a major modification?)
   - *If "No", no further review is needed to complete the checklist for Chapter 106. Please attach all netting calculations and documentation for review by TNRCC NSRP staff.*
   - *If "Yes", the project is a major modification and an exemption may not be used.*
   - *A PSD Permit review must be completed to authorize the project.*

Project No.: 37679214.04300   07-Nov-03

Location: 2537 Butler St. Dallas, TX

Equilibrium Partitioning Equation

Theoretical maximum vapor concentration in soil

Soil Vapor Concentration Calculations:

			Benzene	
C_T	bulk soil concentration	mg/kg	0.15	Site Specific (MW-7)
H'	Henry's Law Constant	unitless	0.23	chemical specific
B	Dry soil bulk density	kg/L	1.8	Site Specific (default=1.8)
Kd	Soil water partitiion coefficient	(kg/kg)/(kg/L)	0.166	(Koc x f)
Koc	Organic carbon partition coefficient	(kg/kg)/(kg/L)	83	chemical specific
f	soil organic carbon fraction		0.002	Site Specific (default=0.002)
Pb	Particle density	kg/L	2.65	Site Specific (default=2.65)
n	Total soil porosity	fraction	0.321	Site Specific (default=1-B/Pb)
n_w	Fraction water voids	fraction	0.15	Assumed
n_a	Fraction air voids	fraction	0.17	$(n-n_w)$

C_a	Soil Vapor Concentration	mg/L	0.127	calculated
C_a	Soil Vapor Concentration	ug/L	127.2	calculated

Equation:

$$C_a = \frac{C_T \times H' \times B}{Kd \times B + n_w + n_a \times H'}$$

Emission Rate Calculation:

			Benzene	
Q	Flow Rate	cu. ft/min	50	Assumed
MW	Molecular weight	lb/lb-mole	78	chemical specific
C_a (ppmv)	Soil Vapor Conc. in ppmv	ppmv	39.2	calculated

Emission Rate before controls		lb/hr	0.02418	
Emission Rate after controls		lb/hr	0.00024	Assume 99% efficiency

Equation:

Emission

     Rate = C_a (ppmv) x MW x Q x 1.581E-7 (lb-mole-min/cu. ft.-ppmv-hr)

Chemical Emission Limit

Project: 37679214.04300   Date: 11/07/03
Site: 2537 Butler St. Dallas, TX

This spreadsheet calculates the emission limit for a chemical according to Standard Exemption 106.262.
Petroleum hydrocarbon emissions are limited to one pound per hour per Standard Exemption 106.533
except that benzene emissions must also meet the conditions of Exemption 106.262(2) and (3).

Calculations: $E = L / K$
where:
E = maximum allowable hourly emission, pounds.
L = Limit value from Table 262
K = Distance factor from Standard Exemption 106.262(3).

Distance to the nearest off-plant receptor   120 feet
Distance factor, K   300.8
Chemical   Benzene
Limit value for chemical, L   3

Maximum allowable emissions, E   0.0100 pounds per hour   0.0100

Chemical	mg/m³	Synonyms
Acetone	590	
Benzene	3	
Chloroform	10	
Methylene chloride	26	
Tetrachloroethene	33.5	Perchloroethylene
Toluene	375 (1)	
Trichloroethene	135	Trichloroethylene
Vinyl chloride	2	
Xylenes	(1)	

(1) TWA-TLV value for chemicals not listed in Table 262

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Memo

EnVac
Environmental Services, LLC

To:

Ms. Terri West
URS
3010 LBJ Freeway Suite 1300
Dallas, TX 75234

972-406-6950 Office phone
972-406-6951 Facsimile

From:

Mr. Brian Burgess
EnVac Environmental Services, L.L.C.
7922 S. 92nd East Place
Tulsa, OK 74183

(918) 461-2161 Office phone
(918) 461-1165 Facsimile
(918) 406-2211 Mobile Phone

Date: May 1, 2003
cc:
Re: Description of MDPE as provided by EnVac

Dear Ms. West:

General Description of the Vacuum Pump and Tank

The *EnVac system*, consists of an industrial vacuum truck (tradename *KingVac*) containing one (1) water sealed, *"Kaiser"* liquid ring pump that is potentially capable of producing air flow rates as high as **1,500 SCFM at 18-inches (Hg) of vacuum**. This high air flow-rate and vacuum are capable when there is no resistance to the vacuum inlet (i.e., open 6-inch inlet valve with no monitor or recovery wells manifolded to the vacuum inlet). While the air flow-rate yielded from near subsurface soil/rock formations is, in most cases, fairly low (i.e., 50 SCFM to 250 SCFM), *ambient* air is added to the hydrocarbon vapor stream via a relief valve on the liquid ring pump to prevent pump cavitation. At most sites, the *cumulative* or *total* air flow rate ranges between 400 and 600 SCFM upon exiting the *KingVac* vapor stacks and entering the thermal oxidizer. It is critical to note that the *high air flow rate* during *high vacuum* (> 18-inches Hg) is what allows mulitiple extraction wells (1 to 5 simultaneously) to be evacuated of liquids while applying substantial vacuum to the contaminated soil strata or rock formation.

The *total* or *cumulative* air flow rate, and hydrocarbon concentration (*diluted T.O. feed*), is monitored approximately every 30 minutes of operation using a thermal anemometer and flame ionization detector (MicroFID-calibrated to methane) and/or combustible gas indicator (Bacharach TLV sniffer – 500 ppm hexane calgas).

The *KingVac* also employs the use a 2,600 gallon debris tank which is used as a liquid/vapor separation knockout for produced groundwater and phase separated hydrocarbon (PSH) emulsion. Liquids generated during MDPE operations are transferred to a local reclamation company at the end of an MDPE event.

General Description of the 750-SCFM thermal Oxidizer (*T.O.*)

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Air & Waste Applications Team

The *EnVac system* also utilizes a 750 SCFM *T.O.* "downstream" from the *KingVac* effluent to destroy extracted hydrocarbon vapors generated during high vacuum multi-phase extraction (HVME). The *T.O.* feed passes through a flame arrestor into the combustion chamber of the *T.O.* The *T.O.* is direct fired using an auxiliary air burner to maintain at least 1,400 degrees (Fahrenheit) combustion temperature, with at least 4.5% flue gas oxygen. Residence time, when operating with *T.O.* feed and 5,500 ppm VOC, calculated as hexane, is **greater than 1.0 second.** Destruction efficiency for non-methane hydrocarbons, calculated as hexane is **99.5%.** When the *T.O.* feed is less than 750-SCFM, the residence time inside the combustion chamber is even longer than 1.0 second, thus, contributing to a higher destruction efficiency.

Temperature in the combustion chamber, when processing soil vapors, is, 1,400 degrees Fahrenheit or higher. Since the oxidization concentration of the VOC's, and the accompanying heat release occurs near the inlet of the *T.O.*, and because there is always some heat loss to the surroundings between the *T.O.* inlet and exhaust stack, the average temperature in the *T.O.* will always be higher than that measured in the exhaust stack. Exhaust stack temperature is, therefore, a conservative value for operating temperature.

Site Specific Data Collection

EnVac conducts all HVME events with site personnel present (site professional and driver/technician). During a typical HVME event, it is the responsibility of the *EnVac* site professional to monitor and report fundamental data, such as, time, air flow-rates (i.e., process stream velocity), temperature, and vapor concentration approximately every 30 minutes. This pertinent information is recorded and reported by *EnVac* in the form of a summary field data report for each HVME event that is conducted (archived reports are available for the previous four (4) years). During each HVME event that *EnVac* conducts, normally three (3) air samples are collected for laboratory analysis (BTEX and TPH) to determine both the destruction efficiency of the *T.O.* and accuracy of the field-screening instrument (FID/combustible gas indicator). .
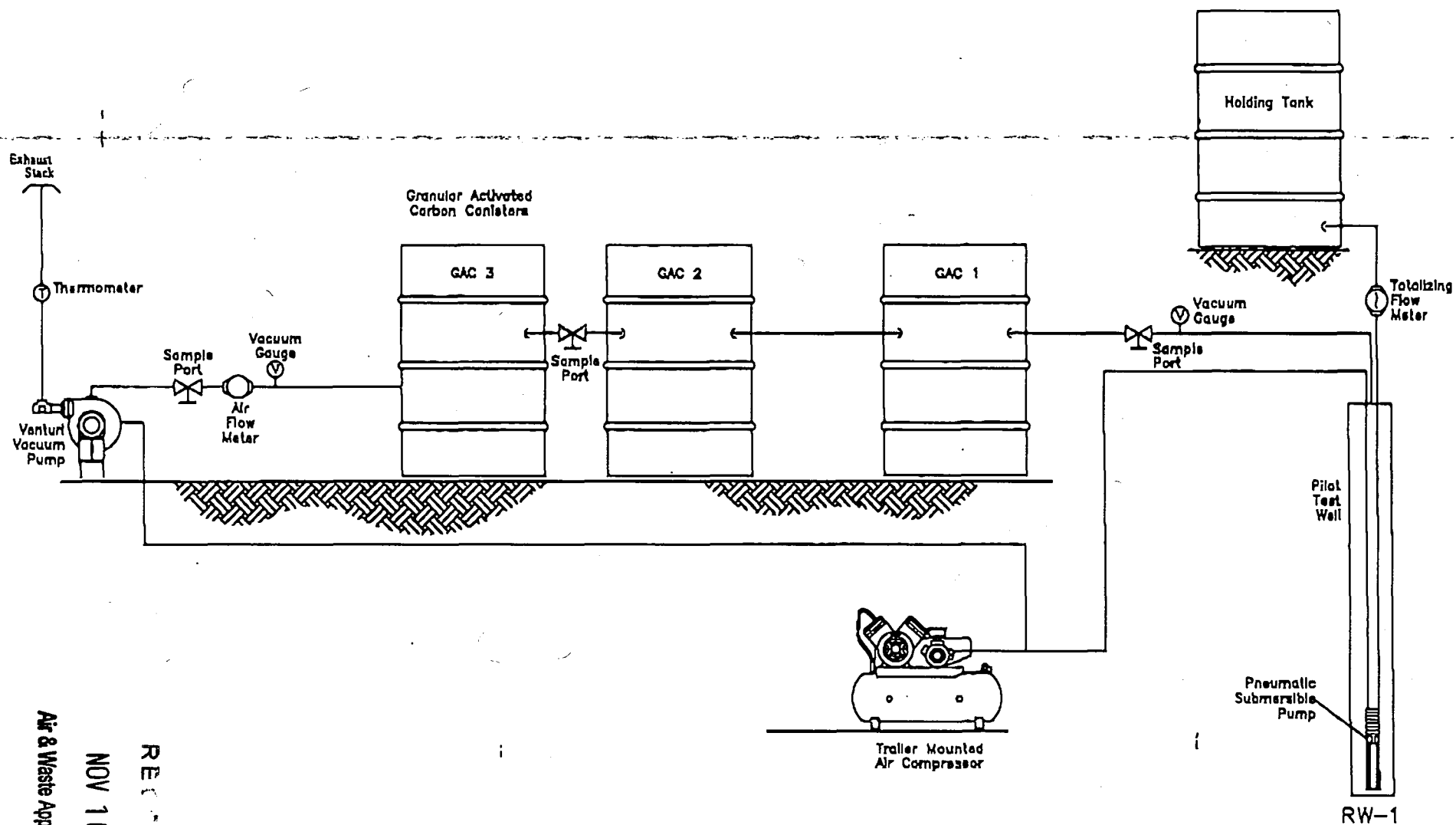
Thank you very much for your attention to this matter and please do not hesitate to call if you have any questions or comments regarding this important issue.

Sincerely,
EnVac Environmental Services, LLC.

Brian W. Burgess

Figure 2. Process Flow Diagram

Date:	5-10-02
Scale:	NTS
By:	DSM