Bryan W. Shaw, Ph.D., P.E., *Chairman* Toby Baker, *Commissioner* Zak Covar, *Commissioner* Richard A. Hyde, P.E., *Executive Director* 



## TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

Protecting Texas by Reducing and Preventing Pollution

June 3, 2014

MR TERRY ADAMS DIRECTOR SA RECYCLING LLC 3200 E FRONTERA ST ANAHEIM CA 92806-2822

#### Re: Change in Ownership Customer Number: CN604589671

Dear Mr. Adams:

Thank you for your request received on June 3, 2014, notifying us of the change in ownership. Your letter states that SA RECYCLING LLC is now the Operator of the facility or facilities listed in the enclosed document. Our records have been updated to reflect this change.

We understand that there will be no change in the type of pollutants emitted and no increase in the quantity of emissions. As the new permittee/registrant, you have committed to maintain compliance with all air quality regulations and applicable rule requirements of the Texas Commission on Environmental Quality.

Thank you for informing us of this change in ownership. If you have any questions regarding this letter, please feel free to contact Ms. Sandra Young at (512) 239-1326.

Sincerely,

Johnny D. Bowers, Team Leader Air Permits Initial Review Team Air Permits Division Texas Commission on Environmental Quality

JDB/sy

 cc: Air Quality Manager, Environmental Services Department, City of El Paso, El Paso Air Section Manager, Region 6 - El Paso Mr. Mark Chambers, Emissions Assessment Section (MC-164), Austin Mr. Adam Bullock, Emissions Assessment Section (MC-164), Austin Ms. Jeanette Emanuel, Emissions Assessment Section (MC-164), Austin TCEQ Central Records (MC-198)

Enclosure

P.O. Box 13087 • Austin, Texas 78711-3087 • 512-239-1000 • tceq.texas.gov

Change in Ownership Table

Domination	•						
Entity Number	Account Number	Permit / Registration Number	Permit / Registration Expiration Date	Previous Permitee / Registrant	TCEQ Region	County	
RN107010000	NIA	- 2 - 00	77.4				
220010/01/01	UNT	20000	NA	Newell Recycling	6 - El Paso El Paso	El Paso	
				Company Of El Paso I.P		<b>)</b>	
	N/N	5007	NTA -				
2200+0/0100	LAV.	/0031	NA	Newell Recycling	6 - El Paso El Paso	El Paso	
			•	Company Of El Paso I P			

## Sandra Young

То: Сс:	TADAMS@SARECYCLING.COM RFCAIR6; Mark Chambers; Adam Bullock; Jeanette Emanuel; Rodriguez- hefnere@elpasotexas.gov; albert.melero@elpasotexas.gov; rimkuskc@elpasotexas.gov; ETORREALBA@SARECYCLING.COM
Subject:	Change in Ownership for SA RECYCLING LLC
Attachments:	211697.Docx

Terry Adams,

This is confirmation that your request for change in ownership received on June 3, 2014 has been completed. Please refer to the attached letter for more details.

1

Thank you,

Sandra Young

06/03/2014NSR IMS - PROJE	CT RECORD	ی پیچ سر می سر می می ورد این	بر این های می واقع و می واقع بی این این این این این این این این این ای
PROJECT#: 211697	STATUS: PENDIN	G	DISP CODE:
RECEIVED: 06/03/2014 PROJTYPE: OWNCHANGE			ISSUED DT:
PROJECT ADMIN NAME: CHANGE OF OWNERS PROJECT TECH NAME: SA RECYCLING STAFF ASSIGNED TO PROJECT: YOUNG , SANDRA - REVIEWR			1
CUSTOMER INFORMATION (OWNER/OPERATO ISSUED TO: SA RECYCLING LLC COMPANY NAME: SA RECYCLING LLC CUSTOMER REFERENCE NUMBER: CN6045896	•		
REGULATED ENTITY/SITE INFORMATION REGULATED ENTITY NUMBER: RN107313322	ACCOUNT	-	
REGULATED ENTITY LOCATION: 6800 MARKET REGION 06 - EL PASO NEAR CITY:		COUNTY: I	EL PASO
		'CLING LLC 322	
PERMIT#: 56088 AUTHTYPE: PBR PERMIT NAME: NEWELL SALVAGE COMPANY O PERMIT#: 76831 AUTHTYPE: PBR PERMIT NAME: NEWELL SALVAGE COMPANY O	RENE PF EL - PASO RENE	WAL:	
PROJECT NOTES: 06/03/2014 CHANGE OF OWNERSHIP EFFE	CTIVE 06/01/2014		Send on one of the send of the
TRACKING ELEMENTS: TE Name APIRT RECEIVED PROJECT (DATE) CENTRAL REGISTRY UPDATED APIRT TRANSFERRED PROJECT TO TECHNIC/ ENHANCED ADMINISTRATIVE OR APPLICATION		Start Date 06/03/2014 06/03/2014	Complete Date 06/03/2014

http://ida.tceq.texas.gov/ida/index.cfm?fuseaction=nsrproject.project\_report&proj\_id=211697 6/3/2014

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	· .	× ×			<u>``</u>	TCE	Q Use Only
TCEQ	TCEQ Co	ore Data	a Fo	orm			
For detailed instructions reg SECTION I: General Inform	arding completion of this f				ions or c	call 512-239-	5175,
1. Reason for Submission (If other is a		a in snaro novidi	ndi	···,			
New Permit, Registration or Authoriz				h the program ap	olicatio	n)	
Renewal (Core Data Form should b				·····	<u> </u>	 Dwnersh	ip
2. Attachments Describe Any A	itachments: (ex. Title \	Application, Wast	e Trans;				
Yes No							
3. Customer Reference Number (if issu		his link to search or RN numbers in	<u>4. Re</u>	gulated Entity F	<b>Refere</b> r	nce Numbe	r (if issued)
CN 60458967	Cent	ral Registry**	RN	100581768		1073	13322
SECTION II: Customer Infe		(vvv) 6/1/20	111				
5. Effective Date for Customer Informat 6. Customer Role (Proposed or Actual) – at		****		Please chock only	nna oft	ba fallowing	
Operato		Owner & Operat			<u>0118</u> 01 0	ne lonowing;	
		Voluntary Clean		icant 🛄Ot	her:		
7. General Customer Information							
New Cuetomer	-	lustomer Informa	tion				ntity Ownership
Change in Legal Name (Verifiable with **If "No Change" and Section I is compl			dilda e Incela	<u>No C</u>	hange	**	
8. Type of Customer: Corporation	· _ · · · · · · · · · · · · · · · · · ·		aty inn			······	
		Individual		Sole Propri	····	·	
		Federal Governi		State Gove			
Other Government General Pa		Limited Partners		_		d Liability	Company
9. Customer Legal Name (If an individual, p	orint last name first: ex: Do	bek	<u>W</u>	omer, enter previc			<u>End Date;</u>
SA Recycling LLC		Ner LP	well R	oyeling Compa	апу оf	El Paso,	06/01/2014
3200 East Frontera S	treet						
10. Mailing Address:	······					<del>,</del>	
City Anaheim	State	CA Z	IP 9	2806		ZIP+4	
11. Country Mailing Information (if outside	(JSA)	12. E-M	lail Ado	ress (if oppilooble)		I	
		tadam	is@sa	recycling.com	m		······································
13. Telephone Number ( 714 ) 283-6100	14. Extens	ion or Code				(if applicabl	e)
	Franchise Tax ID (11 di	(gils) 18. DUN	S Numi	<u>(714)</u> Ser <i>(if applicable</i> ) 1			Number (If applicable)
						-	86010
20. Number of Employees				21. Inde			and Operated?
0-20 21-100 101-250 [	251-500 🛛 501 a	and higher			∏ Ye	s	No
SECTION III: Regulated Ent	ht man	-					
22. General Regulated Entity Information						paniød by a	permit application)
	Regulated Entity Name		Regula	ated Entity Inform	nation	🗌 No (	Change** (See below)
23. Regulated Entity Name (name of the site	GE" is checked and Section where the redulated activ		to Section	n IV, Preparer Infor	mation.	17# I	
SA Recycling LLC				n			
	etres Te	lines	42	3930	· · · · ·	<u> </u>	
TCEQ-10400 (09/07)	2 5093	17-020	, - ,	•	'	·	A Page f of 2
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24. Street Addre		-	. <u></u>					
of the Regulated Entity:	1							
(No P.O. Boxes)	(	City		State	·····	ZIP		ZiP + 4
0H 81-10				u .				
25. Mailing Address:								
	(	City		State		ZIP		ZIP + 4
26. E-Mall Addre		(						
27. Telephone N	umber			28. Extension	or Code	29.	ax Number (# opp	licable)
()						(	) -	
30. Primary SIC	Code (4 d	digits) 31. Seco	ondary SIC (	Code (4 digits)	32. Primary I (5 or 6 digits)	VAICS C	ode 33.8 (5 or 6	econdary NAICS Code digits)
24 Mbat in the E								<i></i>
34. What is the F	mary i		entity? (P	lease do not lepe	at the SIC or NA	ICS des	vription.)	
t					,			
		stions 34 – 37 ad	ldress geog	raphic location	. Please refe	r to the i	instructions for a	oplicability.
35. Description to Physical Locatio								
36. Nearest City			* * j. 18	County		S	ate	Nearest ZIP Code
								·····
37. Latitude (N)	In Dech	mal:			38. Longitu	ide (W)	In Decimal:	
Degrees	Min	ules	Seconds		Degreés		Minutes	Seconda
39. TCEQ Program	s and ID	Numbers Check	all Programs an	d write in the permit	s/registration rum	bers that	vill he affected by the u	pdates submitted on this form of the
upuatea may sior de maç	le, lí your l	Program is not listed,	check other and	d write it in. See the	Côre Data Form i	instruction	s for additional guidance	e
Dam Safety		Districts		Edwards Ac	julfer	🔲 Ind	ustrial Hazardous Wa	aste 📃 Municipal Solid Wast
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LI New Source Key	Review - Air OSSF Dotroloum Storage Tank PWS							
Stormwater								
		Title V - Alr				L Utilities		
U Voluntary Clea	กายก	Mente Met			A		. hat   .	
El voluntery orge	leanup 🗌 Wasto Wator 🔄 Wastewater Agriculture 🗌 Water Rights 🗌 Other:							
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SECTION IV	: Pre	<u>parer Infor</u>	<u>mation</u>	•				
40. Name: <u>Eli</u>	o T <mark>orr</mark> o	calba			41.1	Title:	Director, Ai	r Quality
42. Telephone Nur	nber	43. Ext./Cod	le 44	. Fax Number	45	E Mail	Address	
(714) 371-653	5		0	/14)666-294	10		u	
SECTION V:	Anti	horized Sig	· · · · · · · · · · · · · · · · · · ·	<b>/</b>				
46. By my signati	ire belov nature a	w, T certify, to fl uthority to subn	ne best of m ait this form	iy knowledge, : 1 on behalf of t	that the infor he entity spe	mation cified i	provided in this ; a Section II, Field	form is true and complete, 19 and/or as required for th
See the Core Dat	a Form	instructions for	more info	rmation on wh	o should sig	n this f	orm.)	
Company:	SA Re	ecycling LLC			Job Title	: Di	ector	
Name(In Print) :	Terry	Adams					Phone:	(714)283-6100
Signature:					*****			6/2/14
อเนแสเนเซ: 🤇					the s		Date:	612110



] Urgent

Please review

Please comment





Anaheim, CA 92806 714-630-8901 Fax 714-630-5836 www.sarecycling.com

MAY 1.9 2014 RECEIVED www.sarecycling.com May 13, 2014

3200 East Frontera Street

Texas Commission on Environmental Quality (TCEQ) Air Permits Division Mail Code 163, P.O Box 13087 Austin, Texas 78711-3087

MAY 19 2014

## Subject: Permit-By-Rule (PBR) Change of Ownership Application

On behalf of SA Recycling LLC, I am submitting a Change of Ownership for a Permit-By-Rule (PBR). The current PBR is held by Newell Recycling Company of El Paso, LP, Regulated Entity No. RN-100581768, Account No. EE-0058M, Permit No. 56088.

SA Recycling LLC will assume operational control of the facility as of June 1, 2014, under a lease agreement with Newell Recycling Company of El Paso, LP. I have enclosed a copy of the lease agreement.

Currently, SA Recycling LLC is not contemplating making any changes to the equipment or to the feed rates. However, if in the future, SA Recycling LLC decides to upgrade the current equipment to make it more efficient and/or to increase production, I will notify TCEQ and I will submit the required applications and emissions information.

In my conversations (via telephone) with the TCEQ personnel (TCEQ Region 6, El Paso), I was informed that all I needed to submit was Form APDG 5857 v4 for a PBR change of ownership. I was also informed that no fees were required for the submittal referenced above.

For your reference, I have enclosed a copy a PBR registration package submitted by Newell Recycling Company of El Paso, LP, on June 16, 2010.

If you have any questions or need additional information, please contact me at (714) 283-6113 or at etorrealba@sarecycling.com.

Sincerely,

Elio Torrealba SA Recycling LLC Corporate Air Quality Director

Enclosures:

- 1. SA Recycling LLC / Newell Recycling Company of El Paso, LP lease agreement.
- 2. PBR registration package submitted by Newell Recycling Company of El Paso, LP on June 16, 2010.

TCEQ		on Environmental ( rmits Division me/Ownership Forr				
I. Application Type	<u></u>					
🖌 Change in Ownership	Change in Co	mpany Name				
II. Name of the New Owner of	r Operator of the Facilit	ies or Equipment (Leg	al Entity Name of the new permittee)			
A. Customer Name: SA Recycli	ng LLC	<u> </u>				
B. Customer Reference Number	(CN) (if issued): NA					
C. Submittal Date: 05/13/2014						
D. Effective Date of Change: 06,	/01/2014					
E. Is the new owner an affiliate o	f the previous owner?		YES 🗹 NO			
III. Responsible Official (RO) Contact Information						
Name (🗹 Mr. 🗌 Mrs. 🗍 Ms. 🗍 Dr.	: Terry	Adams				
Title: Director	0					
Company Name: SA Recycling LL	.C					
Mailing Address: 3200 E. Frontera	a Street					
City: Anaheim	State: CA		Zip Code: 92806			
Territory: NA		Country: USA				
Foreign Postal Code: NA		Internal Mail Code:	NA			
Telephone No.: (714) 283-6100		Fax No.: (714) 279	-7544			
E-mail Address: tadams@sarecyclin	g.com					
IV. Technical Contact Informa	ntion					
Name (🖌 Mr. 🗌 Mrs. 🗌 Ms. 🗌 Di	·.):					
Title: Air Quality Director						
Company Name: SA Recycling LLC	)					
Mailing Address: 3200 E. Frontera	Street					
City: Anaheim	State:CA		Zip Code: 92806			
Territory:NA						
Foreign Postal Code: NA		Internal Mail Code:	Internal Mail Code: NA			
lephone No.: (714) 283-6100 Fax No.: (714) 666-2940						
E-mail Address:						
V. Site Information						
A. Site Name: Newell Recyclin	g Company of El Paso	o, LP	· · · · · · · · · · · · · · · · · · ·			
B. Regulated Entity Number (RN	) ( <i>if issued</i> ): RN-100581	768				
C. Account Number ( <i>if issued</i> ): E	E-0058M					

TCEQ 20405 (Revised 01/09) Air Permits Division Change of Name/Ownership Form This form is for use by sources subject to air quality permit requirements and may be revised periodically. (APDG 5857 v4)

Page\_1\_of\_2



#### Texas Commission on Environmental Quality Air Permits Division Change of Name/Ownership Form

V. Site Information (c	ontinuea	)					<u>n an an an</u>		
<b>D.</b> If action is transfer of	ownershi	p, is the c	change fo	r the enti	re site?			[	✓ YES □ NO □ N/A
E. If action is transfer of major source?									
F. Indicate all pollutants	for which	the site	is a majo	r source b	ased on	the site's	potential	to emit.	
Pollutant:	VOC	NOX	SO <sub>2</sub>	PM <sub>10</sub>	CO	PB	HAPs		Other
Major at the Site (YES/NO):	NO	NO	NO	NO	NO	NO	NO		
VI. Air Authorizations That Are Affected By This Action									
A. List all NSR authoriza PBR ID No. 56088	tions (inc 7683	-	BR, SE, a	ınd standa	ard perm	t registra	ations, and	NSR pei	rmits), as applicable:
<b>B.</b> List all FOPs (includin	g SOPs a	ind ÀTO:	s under G	OPs), as	applicab	le:			
VII. NSR Conditions' for	r Change	of Own	ership u	nder 30 T	TAC § 11	6.110(e)	)		
<ul> <li>The new owner agrees to be bound by all the permit conditions and all representations made in the permit and any amendments and alterations.</li> <li>The new owner asserts there will be no change in the type of pollutants emitted.</li> <li>The new owner asserts there will be no increase in the quantity emitted.</li> </ul>									
VIII. FOP Conditions for Change of Ownership									
<ul> <li>For SOP holders: Pursuant to 30 TAC § 122.210 and § 122.211, the permit holder (new owner) is required to submit a permit revision application for a change to the permit identification of ownership or operational control of a site. The change must be facilitated by a written agreement containing a specific date for transfer of permit responsibility, coverage, and liability between the old and new permit holder. This written agreement is maintained with the permit.</li> <li>For GOP holders: Pursuant to 30 TAC § 122.503, the permit holder (new owner) is required to submit (before the change is operated) an application for a new authorization to operate for a change to the permit identification of ownership or operational control of a site. The change must be facilitated by a written agreement containing a specific date for transfer of permit permit identification of ownership or operational control of a site. The change must be facilitated by a written agreement containing a specific date for transfer of permit permit holder. This written agreement is maintained with the permit identification of ownership or operational control of a site. The change must be facilitated by a written agreement containing a specific date for transfer of permit responsibility, coverage, and liability between the old and new permit holder. This written agreement is maintained with the permit.</li> </ul>									
A. Are any other changes needed for the FOP? (If YES, submit the information as explained in the instructions.)									
B. Is there an Acid Rain permit or Clean Air Interstate Rule (CAIR) permit included in the SOP? YES INO (If YES, submit the information as explained in the instructions.)									
IX. Authorization									
I, Terry Adams and that, based on information accurate, and complete.	I, <u>Terry Adams</u> , certify that I am the responsible official for this application and that, based on information and belief formed after reasonable inquiry, the statements and information on this form are true,								
Signature:					Si	gnature I	Date: 05/1	3/2014	
Title: Director									

TCEQ 20405 (Revised 01/09) Air Permits Division Change of Namc/Ownership Form This form is for use by sources subject to air quality permit requirements and may be revised periodically. (APDG 5857 v4)

Page 2 of 2

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#### Sandra Young

From:	Sandra Young
Sent:	Monday, June 02, 2014 1:17 PM
То:	'Elio Torrealba (HQ Orange 0413)'
Subject:	RE: Change of Ownership PBRs 56088 & 76831 - SA Recycling LLC

Thanks, Elio. In this case, you will get your own RN on this site. If you had some common control with Newell, we would have left you on their site. I can create a new RN and transfer both of these authorizations to the new RN. I'll watch for your Core Data form.

By the way, if you need a Stormwater Permit, they won't transfer ownership anyway. They make you get a new one.

From: Elio Torrealba (HQ Orange 0413) [mailto;ETorrealba@sarecycling.com] Sent: Monday, June 02, 2014 1:08 PM To: Sandra Young Subject: RE: Change of Ownership PBRs 56088 & 76831 - SA Recycling LLC

The explanation that I got from my director is as follows:

"The answer is that Newell will have some responsibilities as the landlord, but that SA will be able to conduct all of its business activities without relying on Newell."

I hope this helps.

Elio Torrealba Director, Air Quality Compliance SA Recycling Anaheim, CA etorrealba@sarecycling.com 714.688.4947 (voice) 714.371.6535 (cell) 714.639.9430 (fax) www.sarecycling.com GOT SCRAP? ®

new per geling

From: Sandra Young [mailto:Sandra.Young@tceq.texas.gov]
Sent: Monday, June 02, 2014 10:50 AM
To: Elio Torrealba (HQ Orange 0413)
Subject: RE: Change of Ownership PBRs 56088 & 76831 - SA Recycling LLC

Elio,

Is any of what you do dependent on Newell or are they dependent on you for anything (a product, shipping, etc.)? Sandra

From: Elio Torrealba (HQ Orange 0413) [mailto:ETorrealba@sarecycling.com]
Sent: Monday, June 02, 2014 12:46 PM
To: Sandra Young
Subject: RE: Change of Ownership PBRs 56088 & 76831 - SA Recycling LLC

No, but they still own the site and the equipment, which SA Recycling may buy in the near future. Currently, we just lease the site and the metal scrapping equipment.

Elio Torrealba Director, Air Quality Compliance SA Recycling Anaheim, CA <u>etorrealba@sarecycling.com</u> 714.688.4947 (voice) 714.371.6535 (cell) 714.639.9430 (fax) www.sarecycling.com GOT SCRAP? ®

From: Sandra Young [mailto:Sandra.Young@tceq.texas.gov]
Sent: Monday, June 02, 2014 10:03 AM
To: Elio Torrealba (HQ Orange 0413)
Subject: RE: Change of Ownership PBRs 56088 & 76831 - SA Recycling LLC

Is Newell still working on the site?

From: Elio Torrealba (HQ Orange 0413) [mailto:ETorrealba@sarecycling.com]
Sent: Monday, June 02, 2014 11:17 AM
To: Sandra Young
Subject: RE: Change of Ownership PBRs 56088 & 76831 - SA Recycling LLC

Thank you so much for the reminder Sandra.

BTW, If SA Recycling decides not to take over the responsibilities of the UST located at the El Paso facility, do we need to submit additional applications? SA Recycling, does not plan to use the UST. We rather leave the UST under the responsibility of Newell Recycling Company of El Paso, TCEQ RN-100581768.

I figure that we would want to take over the responsibilities of the on-site sewage facility permit and the Stormwater permit, but I still don't have confirmation from our Stormwater Manager, Lindsay Maine. We'll keep you posted on these two items. Lindsay is currently on leave. She'll return in about a week.

Thank you.

Elio Torrealba Director, Air Quality Compliance SA Recycling Anaheim, CA <u>etorrealba@sarecycling.com</u> 714.688.4947 (voice) 714.371.6535 (cell) 714.639.9430 (fax) www.sarecycling.com GOT SCRAP? ®

**From:** Sandra Young [mailto:Sandra.Young@tceq.texas.gov] **Sent:** Monday, June 02, 2014 7:42 AM

2

#### To: Elio Torrealba (HQ Orange 0413)

Subject: Change of Ownership PBRs 56088 & 76831 - SA Recycling LLC

Elio, Just a reminder to fax the Core Data form to my attention at 512-239-7130 so I can change ownership.

Sandra Young The Texas Commission on Environmental Quality 12100 Park 35 Circle Bldg C, Mail Code 161 Austin, TX 78753 Phone: 512-239-1326 Fax: 512-239-7130

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# Hold - June 6

### Sandra Young

From: Sent: To: Cc: Subject: Elio Torrealba (HQ Orange 0413) <ETorrealba@sarecycling.com> Tuesday, May 20, 2014 1:54 PM Sandra Young Terry Adams (HQ Orange 0575); Lindsay K. Maine (HQ Orange 0411) RE: Change of Ownership Authorizations on RN100581768

Hello Sandra,

You are correct. Terry Adams is the Responsible Official (RO) of record.

As discussed, please transfer both PBR Registrations (56088 and 76831) to the SA Recycling LLC name.

Additionally, as you indicated during our telephone conversation, I will not be sending the TCEQ Core Data Form to you until after the lease agreement on the site becomes official, after June 1, 2014.

will let you know about the On-Site Sewage Facility permit, the Petroleum Storage Tank Registration, and the Stormwater permit after I have a chance to discuss it with our director, Terry Adams, and our stormwater manager, Lindsay Maine.

It was a real pleasure speaking with you. Should you need additional information, please let me know.

Thank you so much for your help.

Elio Torrealba Director, Air Quality Compliance SA Recycling Anaheim, CA <u>etorrealba@sarecycling.com</u> 714.688.4947 (voice) 714.371.6535 (cell) 714.639.9430 (fax) www.sarecycling.com GOT SCRAP? ®

From: Terry Adams (HQ Orange 0575)
Sent: Tuesday, May 20, 2014 9:19 AM
To: Sandra Young
Cc: Elio Torrealba (HQ Orange 0413)
Subject: Re: Change of Ownership Authorizations on RN100581768

Hi Sandra. I am currently out of the office this week and I have asked Elio to assist in answering your questions. Regards Terry

Sent from my iPhone

On May 20, 2014, at 9:29 AM, "Sandra Young" <<u>Sandra.Young@tceq.texas.gov</u>> wrote:

I just saw the 06/01/2014 Effective Date of Change. I can't do a Change of Ownership in advance. If you'll get me the rest of the information I need, I will hold it until June 1<sup>st</sup> and I will contact you to get an email verifying that the transfer did take place. Thanks. Sandra

I have your Change of Name/Ownership form, but you did not fill in the name of the RO. Please give me that information. We don't use a Technical Contact for Changes of Ownership.

You listed Registration 56088 on this form, but there is a second active PBR – 76831. May I also transfer this Registration?

I also need a Core Data form, which I have attached. Be sure and fill out the entire first page. I will need that information in order to create a Customer Number (CN) for SA Recycling LLC. Just leave the CN space on the form, blank for now. In #23, you might want to change the Registered Entity name (RN). It is currently Newell Recycling. On the second page, please fill out #40 and get a signature. You can fax this form to my attention at 512-239-7130.

Are you also taking over the On Site Sewage Facility permit, the Petroleum Storage Tank Registration, and the Stormwater permit for this site? Please let me know because I will have a few other questions if not. When I complete my paperwork, it will be sent to these other TCEQ programs so they can process a Change of Ownership. They should call you if they need any additional documents.

Thanks.

Sandra Young Lawless The Texas Commission on Environmental Quality 12100 Park 35 Circle Bldg C, Mail Code 161 Austin, TX 78753 Phone: 512-239-1326 Fax: 512-239-7130

<CDF 10400.doc>

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