

Attachment #1
AIR PERMIT
FOLDER LEVEL

AIR PA #: WA0040C 000000X

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2004

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AIR/WA0040C/PA

07/21/1999 NSR Permits IMS Project Record 15:16:23

Project#: 66624 PrePerm: / / Group: COAT Permit #: X
Received: 06/16/1999 Reg6NOV: / / TechEngr: RXC2 ProjType: XLTR
Fee Date: / / Date BO: / / (Roberto Coronado) STDX1: 454
Fee Amt.: \$0 Bd-Ord#: - - NewJobs: 0 182(f): NO

Issued To: Texas Department Of Criminal Justice PSD-TX #: <NONE>
ProjLink: <NONE>

<Primary Contact Information>

Email:

Name: Mr. Marty Smith Title: Asst. Dep. Dir., Env.
Building: Phone: () -
Street: P.O. Box 4011 Fax: () -
City, State, Zip: Huntsville, Texas, 77340-4011

<Project Information>

Unit: Cold Solvent Cleaner SIC: _____ Region: 12
Account: WA-0040-C Capacity: SCC: _____ County: WALKER
UnitType: MXDEGC CapUnits: Lat: _____ City: Huntsville
Location: Route 6, FM 980 Long: _____ CtyCo: WALKER
Detail: Jim Estelle Unit

CORE Recd: 06/16/1999 ESOC: / / Deficient: / / RFC-SR: / /
CORE Engr: /RCC1 ASOC: / / Tech.Comp: 07/16/1999 RFC-DSC: / /
AdminComp: / / ESOC: / / Comp.Ltr.: / / ED Post: / /
TransEngr: / / ASOC: / /

<Public Notice Required: ???>

<Public> Requested Disposed Code

Meeting: / / / /
Hearing: / / / /

Date Notified: / /
Date Published: / /
Date PN/Sign/Cert: / /

<TONS/Yr Reduction> <NOX> <CO> <VOC> <PM> <SO2>

NSRP Reductions 0.0 0.0 0.0 0.0 0.0 0.0
VERP 766(A), 7(B): 0.0 0.0 0.0 0.0 0.0 0.0

Status: PARAGRAPHS (1) & (3) ARE APPLICABLE

<Project Activity History>

No	Date	Code	Date	Code	TelCons	Mis Date	Mis Code
1	/ /		/ /				
2	/ /		/ /				
3	/ /		/ /				
4	/ /		/ /				
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9	/ /		/ /				
10	/ /		/ /				

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TCEQ - CENTRAL FILE ROOM

<Codes: E=Engineer, C=Company, O=Other, ?=Partial, *=Complete>

NSPS Code:	N.A. County: NO	Non-PSD-Major: ???	<Local Programs>
NESHAP Code:	N.A.Net.Reg: ???	PSD Net. Req: ???	County: NO
MACT Code: ???	N.A.Rev.Reg: ???	PSD Rev. Req: ???	City: ???

<Project Disposal>

Chief Sign: 07/23/1999
Date Issued: / / Code: X

Processing Days as of 07/21/1999

Eng: 37 Comp: 0 Other: 0

Warn: NONE

FILE/AXCZ

Robert J. Huston, *Chairman*
R. B. "Ralph" Marquez, *Commissioner*
John M. Baker, *Commissioner*
Jeffrey A. Saitas, *Executive Director*



TEXAS NATURAL RESOURCE CONSERVATION COMMISSION

Protecting Texas by Reducing and Preventing Pollution

July 23, 1999

Mr. Marty Smith
Assistant Deputy Director for Environmental
Texas Department Of Criminal Justice
P.O. Box 4011
Huntsville, Texas 77340-4011

Re: Jim Estelle Unit: Diesel Mechanics Class
Cold Solvent Cleaner
Huntsville, Walker County
Account ID No. WA-0040-C

Dear Mr. Smith:

This is in response to your letter dated June 8, 1999, concerning the proposed installation and operation of a cold solvent cleaner at Route 6, FM 980 in Huntsville, Walker County. Based upon the information that you submitted, we understand that:

1. Your cold solvent cleaner is subject to the requirements of paragraphs (1) and (3) of 30 Texas Administrative Code (TAC) Section 106.454.
2. Total solvent makeup is less than 110 gallons per year. Therefore, registration using Form PI-7 is not required.

After evaluation of the information which you have furnished, we have determined that your cold solvent cleaner is exempt from permitting procedures under 30 TAC §106.454 if installed and operated as described in your letter. This exemption from permitting was authorized by the Executive Director of the Texas Natural Resource Conservation Commission (TNRCC) pursuant to 30 TAC Chapter 106. A copy of the exemption in effect at the time of this determination is enclosed. You must operate in accordance with all applicable requirements of the enclosed exemption from permitting.

Mr. Marty Smith

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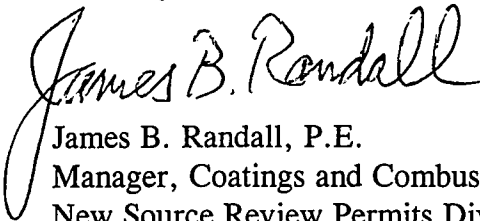
July 23, 1999

Re: Jim Estelle Unit: Diesel Mechanics Class

You are reminded that regardless of whether a permit or an exemption is required, this facility must be in compliance with all rules and regulations of the TNRCC and of the U.S. Environmental Protection Agency at all times.

If you have any questions concerning this correspondence, please call Mr. A. Roberto Coronado at (512) 239-6119 or write to him at Texas Natural Resource Conservation Commission, Office of Permitting, New Source Review Permits Division (MC-162), P.O. Box 13087, Austin, Texas 78711-3087.

Sincerely,

A handwritten signature in cursive script that reads "James B. Randall". The signature is written in dark ink and is positioned above the printed name and title.

James B. Randall, P.E.
Manager, Coatings and Combustion Section
New Source Review Permits Division

JR/RC/ss

Enclosure

cc: Ms. Orbie Ratcliff, Air Section Manager, Houston

Record No. 66624

COATINGS UNIT - EXEMPTION REVIEW SHEET

30 TAC Section 106.454 Review

Date Received by TNRC: 06-16-99 Date Received by Engineer: 06-18-99 E-mail Initials: RCORONAD
 Claimant: Texas Department Of Criminal Justice
 Account ID No.: WA-0040-C Permit No.: X Project No.: 66624
 Region: 12 County: Walker City: Huntsville
 Project Overview: Cold Solvent Cleaner / Diesel Mechanics Class / Windham School District

Is registration required?

Yes ☐ No ☒

Form Submitted:

None	PI-7	PI-7-124	PI-7-261	PI-7-261(a)	PI-7-436	PI-8
X						

Is a site review required?

Unknown ☐ Yes ☐ No ☒

Was site review favorable?

N/A ☒ Yes ☐ No ☐

Is an NOV involved for operating without proper authorization?

Unknown ☐ Yes ☐ No ☒

Is the facility located in a non-attainment county?

If Yes: Does the facility satisfy the requirements of 30 TAC Chapter 115?

N/A ☒ Yes ☐ No ☐

Is this facility at a site with previously permitted facilities?

If Yes: Do any special conditions ADDRESS use of exemptions at this site?

N/A ☒ Yes ☐ No ☐

Does this exemption registration/claim modify a permitted facility?

If Yes: 1. Do special conditions PRECLUDE MODIFICATION by exemption?
 2. Does this exemption need to be incorporated into the permit during the next permit amendment or renewal?

N/A ☒ Yes ☐ No ☐

Has SUFFICIENT INFORMATION been provided to determine if:

- 30 TAC §106.4 requirements are (or are not) being satisfied?
- the facility satisfies (or does not satisfy) the conditions of the exemption?

Yes ☒ No ☐
 Yes ☒ No ☐

Engineer's Determination:

☒ X2: 30 TAC §106.4 and exemption requirements are satisfied (non-autobody).

☐ X10/X14

Insufficient information has been submitted to determine if 30 TAC §106.4 and/or exemption requirements are satisfied.

Contact with claimant: Date:
 Date:

Purpose:
 Purpose:

Comments: The cold solvent cleaner is subject to the requirements of paragraphs (1) and (3) of 30 TAC §106.454. Furthermore, total solvent makeup is less than 110 gallons per year. Therefore, registration using Form PI-7 is not required.

Engineer:

A. Robert Coronado

Date:

7/16/99

Exemption Coordinator:

A. Robert Coronado

Date:

7/20/99



TEXAS DEPARTMENT OF CRIMINAL JUSTICE

Facilities Division Engineering Department
Environmental

P.O. Box 4011 • Huntsville, Texas 77340-4011

Wayne Scott
Executive Director

June 8, 1999

Matthew Baker
Office of Air Quality
New Source Review Division MC-162
Coatings and Combustion Section
P.O. BOX 13087
Austin, Texas 78711-3087

Re: Jim Estelle Unit, Walker County
Route 6, FM 980.
Huntsville, TX 77340
Account No. WA0040C (Formally Ellis Unit II)

§106.454 Degreasing Unit

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PERMITS PROGRAM

Mr. Baker:

The Environmental section of Facilities Engineering is requesting a letter of permit exemption referencing the operation of a cold solvent degreaser at the Jim Estelle Unit. The cleaner will demonstrate operating parameters as set forth by 30 TAC §106.454 part (3), Cold Solvent Cleaners. Please see the enclosed checklist and MSDS referencing the operating conditions of the following cleaner: The Kleen-Flo Model 70, SN 6861 located at the Diesel Mechanics Class operated by the Windham School District.

The cleaner has a calculated freeboard ratio >0.70 with a cover that will allow for easy one-handed operation. The degreaser has a cold solvent spray that is a solid fluid stream operating at <10 psi. An internal-cleaned parts drainage basket is provided for enclosed draining under cover. Cleaned parts are drained for at least 90 seconds or until dripping ceases. Considering annual solvent use (gross usage minus waste disposal) is <110 gallons per year and referencing exemption conditions as specified in part (3)(E), Form PI-7 registration is not required.

Monthly records of solvent makeup will be kept (usage minus disposal) and all waste solvent will be stored in an authorized on-site waste container where it will be removed by a licensed disposal service. The cleaner will not be used for the degreasing of absorbent or porous materials. There are permanent instructions posted near the cleaner summarizing the proper operating procedure to minimize emissions.

According to the information supplied on the enclosed checklists and MSDS, it is our understanding that the requirements for permit exemption for this cleaner as specified in (3) of §106.454, are satisfied.

Should you have questions or require further information concerning this request for exemption, please direct all inquiries to Gary Martin at (409) 437-1824.

Thank You:



Marty Smith
Assistant Deputy Director for Environmental

MS\glm

cc: Steven C. Mugg, P.E., C.P.E., Deputy Director for Facilities Engineering
Tom McMickle, Environmental Manager, Air Quality
Wayne Ginsel, Superintendent, Windham School District

ESTHER
LINDALL
DIESEL



DIESEL
MECHANICS
CLASS
~~WORKSHOP~~

30 TAC Section 106.454 Checklist
(Previously Standard Exemption 107)

Solvent Degreasing Units

WA-0040-C

The following checklist was developed by the Texas Natural Resource Conservation Commission (TNRCC) to assist the registrant in determining whether a degreaser meets the requirements of 30 Texas Administrative Code (TAC) Section 106.454, previously Standard Exemption (SE) No. 107. If all the exemption requirements are not met, the facility will not be allowed to operate under exemption and an application for a construction permit will be required.

The questions below follow the format of Exemption 106.454. Check the appropriate Yes or No box, and provide information in the blank spaces. If additional specific information needs to be given, include it on an extra page and explain which question or blank space is being referenced.

This checklist is for:

a Remote Reservoir Cleaner?

[] Yes [] No

Note: If 'Yes', complete part (a)

a Cold Solvent Cleaner?

[☒] Yes [] No

Note: If 'Yes', complete part (b)

7/16/99

a Open Top Solvent Vapor Degreaser?

[] Yes [] No

Note: If 'Yes', complete part (c)

a Conveyorized Degreaser?

[] Yes [] No

Note: If 'Yes', complete part (d)

(a) The following conditions apply to Remote Reservoir Cleaners ONLY:

- (1) The Remote Reservoir is made by _____, model number _____.
The total cleaner open area is equal to _____ inches long TIMES _____ inches wide which equals _____ square inches. The drain area is equal to $(\pi D^2)/4 =$ _____ square inches; where the D is the diameter of the opening and $\pi = 3.14$.
(e.g. for D = 2 inches: $\pi \times D \times D \div 4 = 3.14 \times 2 \text{ in.} \times 2 \text{ in.} \div 4 = 3.14 \text{ in.}^2$)
- (2) Does the degreaser have a solvent spray? [] Yes [] No
If Yes, the fluid spray stream is _____ (solid stream, or atomized spray) and operates at _____ pounds per square inch.
- (3) I am enclosing the Material Safety Data Sheet (MSDS) for the type of solvent to be used, this will allow the TNRCC to determine the true vapor pressure of the solvent at 100°F.
[] Yes [] No
- (4) Is the solvent heated? [] Yes [] No

N/A

Exemption 106.454 (previously SE 107) Checklist
Solvent Degreasing Units
Page 2

- (5) Is the waste solvent from all degreasing operations stored in covered containers, and removed by a licensed disposal service or emptied into an authorized on-site waste management facility?
[] Yes [] No

- (6) Are porous or absorbent materials, such as cloth, leather, wood, or rope degreased?
[] Yes [] No

- (7) Will leaks be repaired immediately? [] Yes [] No

If No, will the degreaser be shut down until repairs are complete?

[] Yes [] No

- (8) Will a permanent and conspicuous label summarizing proper operating procedures to minimize emissions be posted on or near the degreaser? [] Yes [] No

(b) The following conditions apply **ONLY** to Cold Solvent Cleaners:

- (1) Condition (A) or (B) below must be satisfied:

- (A) Measure the distance from the top of the solvent level in the degreaser to the top edge of the degreasing tank (24 inches) and DIVIDE by the smaller of degreaser tank width, length, or diameter (21 inches); this equals 1.142, the freeboard ratio. Is the calculated freeboard ratio 0.70 or more?
[☒] Yes [] No

If No is answered in part (A) above,

- (B) The solvent is insoluble in and heavier than water and there are 4 inches of water above the solvent level (a water cover); a solvent MSDS is enclosed for verification.

[] Yes [] No \Rightarrow N/A

- (2) The cleaner is equipped with a cover that has a handle for easy one-handed operation.

[☒] Yes [] No

If No, enclose the solvent MSDS and answer the questions below:

Is the solvent agitated? [] Yes [] No

Is the solvent heated? [] Yes [] No

- (3) Does the degreaser have a solvent spray? [☒] Yes [] No

If Yes, the fluid spray stream is YES (solid stream) or atomized spray) and operates at 5 pounds per square inch.

- (4) Cleaned parts are drained for 90 (seconds) or 2 MINUTES. An internal cleaned-parts BASKET (i.e. rack, basket, etc.) is provided for enclosed draining under a cover. If you try to use an external-cleaned parts drainage rack submit the solvent MSDS for vapor pressure determination.

Exemption 106.454 (previously SE 107) Checklist
Solvent Degreasing Units
Page 3

- (5) Annual solvent use (gross usage minus waste disposal) is 10 gallons per year. all
- (6) The amount of chlorinated solvent used is 0 gallons per year. all
- (7) Have you included or submitted a Form PI-7 to register the degreaser? all
[] Yes [X] No
And, will monthly records be kept of total solvent makeup (gross usage minus waste disposal)?
[X] Yes [] No all
- (8) Is the waste solvent from all degreasing operations stored in covered containers, and removed by a licensed disposal service or emptied into an authorized on-site waste management facility?
[X] Yes [] No all
- (9) Are porous or absorbent materials, such as cloth, leather, wood, or rope degreased?
[] Yes [X] No all
- (10) Will leaks be repaired immediately? [X] Yes [] No all
If No, will the degreaser be shut down until repairs are complete?
[] Yes [] No
- (11) Will a permanent and conspicuous label summarizing proper operating procedures to minimize emissions be posed on or near the degreaser? [X] Yes [] No all
- (12) Will the degreaser, regardless of the county in which it is located, meet the requirements of 30 TAC Chapter 115, §115.412, and §115.415 concerning cold cleansers?
[X] Yes [] No all

(c) The following condition apply to Open Top Solvent Vapor Degreasers ONLY: 2/16/99

- (1) The length of the solvent surface _____ feet TIMES the width of the solvent surface _____ feet equals _____ square feet.
- (2) Is the cleaner equipped with a cover that can easily be opened without disturbing the vapor zone?
[] Yes [] No
If the degreaser opening, _____ feet long TIMES _____ feet wide which equals _____ square feet, is more than 10 square feet, a powered cover is required.
- (3) Is the degreaser cover kept CLOSED except when parts are being processed? N/A
[] Yes [] No

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JUN 16 1999

PERMITS PROGRAM

DATE ISSUED: 03/22/99
SUPERSEDES DATE: 01/24/97

MATERIAL SAFETY DATA SHEET

EXXON COMPANY, U.S.A. P.O. BOX 2180 HOUSTON, TX 77252-2180

A. IDENTIFICATION AND EMERGENCY INFORMATION

PRODUCT NAME
VAR SOL 1

PRODUCT CODE
131030 - 00627

PRODUCT CATEGORY
Petroleum Solvent

PRODUCT APPEARANCE AND ODOR
Clear water-white liquid
Mineral spirits odor

MEDICAL EMERGENCY TELEPHONE NUMBER: (713) 656-3424

TRANSPORTATION EMERGENCY TELEPHONE NUMBERS
(BAYTOWN) (281) 834-3296 (CHEMTREC) 1-800-424-9300

FOR PRODUCT INFORMATION AND TECHNICAL ASSISTANCE CALL: 1-800-443-9966

FOR A FAXED COPY OF AN MSDS DIAL: 1-800-298-4007

FOR AN MSDS OR ASSISTANCE WITH AN MSDS, DIRECT INQUIRIES TO THE ADDRESS
BELOW OR CALL:

MARKETING TECHNICAL SERVICES
EXXON COMPANY, U.S.A.
ROOM 2344
P. O. BOX 2180
HOUSTON, TX 77252-2180
(713) 656-5949

B. COMPONENTS AND HAZARD INFORMATION

COMPONENTS	CAS NO. OF COMPONENTS	APPROXIMATE CONCENTRATION
Stoddard solvent	8052-41-3	100%
This product consists predominantly of C7 C10 hydrocarbons.		
It includes:		
C7 C10 saturated hydrocarbons	Mixture	Approximately 83.0%
1,2,4-Trimethylbenzene	95-63-6	Approximately 4.0%
C8 Aromatics	Mixture	Approximately 17.0%
This product, as manufactured by Exxon, does not contain polychlorinated biphenyls (PCB's).		
All components of this product are listed on the U.S. TSCA inventory.		
See Section E for Health and Hazard Information.		

anesthesia, drowsiness, unconsciousness, and other central nervous system effects, including death.

NATURE OF HAZARD AND TOXICITY INFORMATION

Prolonged or repeated skin contact with this product tends to remove skin oils, possibly leading to irritation and dermatitis; however, based on human experience and available toxicological data, this product is judged to be neither a "corrosive" nor an "irritant" by OSHA criteria.

Product contacting the eyes may cause eye irritation.

Product has a low order of acute oral and dermal toxicity, but minute amounts aspirated into the lungs during ingestion or vomiting may cause mild to severe pulmonary injury and possibly death.

This product is judged to have an acute oral LD50 (rat) greater than 5 g/kg of body weight, and an acute dermal LD50 (rabbit) greater than 3.16 g/kg of body weight.

PRE-EXISTING MEDICAL CONDITIONS WHICH MAY BE AGGRAVATED BY EXPOSURE

Petroleum Solvents/Petroleum Hydrocarbons - Skin contact may aggravate an existing dermatitis.

F. PHYSICAL DATA

The following data are approximate or typical values and should not be used for precise design purposes.

BOILING RANGE

157-201°C (315-394°F)

VAPOR PRESSURE

1.6 mm Hg @ 20°C (68°F)
ASTM D 2879

SPECIFIC GRAVITY (15.6°C/15.6°C)

0.80 (6.67 lb/gal)

VAPOR DENSITY (AIR = 1)

3.5

MOLECULAR WEIGHT

140

PERCENT VOLATILE BY VOLUME

Approximately 50% in 29 minutes
@ 1 atm. and 25°C (77°F)

pH

Essentially neutral

EVAPORATION RATE @ 1 ATM. AND 25°C (77°F) (n-BUTYL ACETATE = 1)

0.1

POUR, CONGEALING OR MELTING POINT

Less than -18°C (0°F)
Pour Point by ASTM D 97

SOLUBILITY IN WATER @ 1 ATM. AND 25°C (77°F)

Negligible; 0.005%

VISCOSITY

1.25 cSt @ 25°C (77°F) ASTM D 445

G. REACTIVITY

This product is stable and will not react violently with water. Hazardous polymerization will not occur. Avoid contact with strong oxidants such as liquid chlorine, concentrated oxygen, sodium hypochlorite, calcium hypochlorite, etc., as this presents a serious explosion hazard.

H. ENVIRONMENTAL INFORMATION