

February 3, 1999

Mr. Paul Moyer
Director of
Environmental Affairs
Brite-Sol Services
P.O. Box 1791
Wilmington, Delaware 19899

Re: Tank Semi-Trailer
Cleaning Facility
Channelview, Harris County

Dear Mr. Moyer:

This is in response to your application dated January 4, 1999 concerning the addition of chemicals to your existing list of authorized chemical products to be cleaned from tank trucks and containers near 2700 Appelt Drive, Channelview, Harris County. After evaluation of the information which you have furnished, we have determined that your project is exempt from the permit procedures under 30 Texas Administrative Code (TAC) Section 106.261 if operated as described in your letter. We understand these emissions, 0.15 pounds per hour and 0.04 tons per year of volatile organic compounds, are based on the cleaning of five 6,000 gallon containers per week for fifty-two weeks per year. We further understand the emissions resulting from the cleaning of these additional chemical products will be controlled through utilization of an existing caustic scrubber and flare (operated together in series). Recordkeeping and reporting requirements of Permit No.18447 emissions shall be utilized to ensure compliance with maximum allowable emission rates associated with the cleaning of both the new species and species formed during the rinsing and scrubbing process.

This exemption was authorized by the Executive Director of the Texas Natural Resource Conservation Commission (TNRCC) pursuant to 30 Texas Administrative Code Chapter 106. A copy of the exemption in effect at the time of this determination is enclosed. You must operate in accordance with all requirements

Mr. Paul Moyer
Page 2
February 3, 1999

Re: Tank Semi-Trailer Cleaning Facility

of the enclosed exemption.

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

Your cooperation in this matter is appreciated. If you have any questions concerning this exemption, please call Mr. Don Young, P.E., at (512) 239-1165 or write to him at Texas Natural Resource Conservation Commission, Office of Air Quality, New Source Review Permits Division (MC-162), P.O. Box 13087, Austin, Texas 78711-3087.

Sincerely,

Tammy Villarreal
Manager, Chemical Section
New Source Review Permits Division

TV/DY/pl

Enclosure

cc: Ms. Orbie Ratcliff, Air Section Manager, Houston
Mr. Rob Barrett, Director, Harris County Pollution Control
Department, Pasadena
Mr. John J. McKee, Manager, Brite Sol Services, Wilmington,
Delaware

Record No. 63615

bcc: Mr. Ralph G. Chaiet, Phoenix Engineering, Inc.

New Source Review, Office of Air Quality 7200\MC-162

MR PAUL MOYER
DIR OF ENV AFFAIRS
BRITE-SOL SERVICES
PO BOX 1791
WILMINGTON DE 19899

New Source Review, Office of Air Quality 7200MC-162

MR RALPH G CHAIET
PHOENIX ENGINEERING INC
STE 500
8866 GULF FWY
HOUSTON TX 77017

New Source Review, Office of Air Quality 7200MC-162

MR. JOHN J. MCKEE
MANAGER
BRITE-SOL SERVICES
PO BOX 1791
WILMINGTON DE 19899