October 23, 1997

Mr. Jeff Large Environmental, Health, and Safety Manager Reef Industries, Inc. 9709 Almeda Genoa Road Houston, Texas 77075

Re: 60 Gallon Solvent Distillation Unit Houston, Harris County Account ID No. HG-0294-R

Dear Mr. Large:

This is in response to your letter dated August 26, 1997, concerning the proposed installation of a solvent distillation unit at your plant located at 10020 Mykawa Road in Houston, Harris County. We understand that the solvent distillation unit will be located at least 100 feet from any off-plant receptor.

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 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.

You are reminded that regardless of whether a permit is required, this facility must be in compliance with all rules and

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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 contact Mr. A. Roberto Coronado of our New Source Review Permits Division at (512) 239-6119.

Sincerely,

James E. Crocker, P.E. Manager, Coatings and Combustion Section New Source Review Permits Division Texas Natural Resource Conservation Commission

JC/RC/ds

Enclosure

cc: Ms. Karen Atkinson, Assistant Regional Manager, Houston Mr. Rob Barrett, Director, Harris County Pollution Control Department, Pasadena

Mr. Manuel Aguirre, P.E., Chief, Bureau of Air Quality Control, Health and Human

Services Department, Houston

Record No. 53709

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ENVIRONMENTAL HEALTH AND SAFETY MANAGER