

May 6, 1994

Mr. David L. Clark  
General Manager  
HOYER USA INC.  
9938 Chemical Road  
Pasadena, Texas 77507

Re: Standard Exemption  
Registration No. 24722  
and 24728 - 24732  
Intermodal Container  
Services  
Pasadena, Harris County  
Account ID No. HG-4807-D

Dear Mr. Clark:

This is in response to your exemption registrations, Form PI-7, concerning plans to vapor free and intermodal tank containers containing the following chemicals not listed on Permit No. 21999:

Poly Alkyl Pyridines	Nalco 7369 Corrosion Inhibitor
R-8278	SF-1245
HAMP-ENE 100	Duraphos Dibutyl Hydrogen Phosphite
Isophorone Diamine	Foray 48B
Ethomeen C/12	Bayhibit AM
Sulfa-Check 2420	Piperazine
Naxonate 4L	ENJ-3912C
Di-Tert-Butylphenol 2,4	IS-7073

We understand emissions are based on a 50 container limit and will not exceed 0.144 tons per year of volatile organic compounds.

After evaluation of the information which you have furnished, we have determined that your proposed plans are exempt from permitting procedures under Standard Exemption Nos. 106 and 118 if constructed and operated as described in your application. These standard exemptions were authorized by the Executive Director pursuant to Texas Natural Resource Conservation Commission (TNRCC) Rule 116.211 of Regulation VI. Copies of the exemptions in effect at the time of this registration are enclosed. You must operate in accordance with all requirements of the enclosed standard exemptions.

You are reminded that regardless of whether a permit is required, these facilities must be in compliance with all air quality 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 contact Mr. Monico Banda of our New Source Review Program.

Sincerely,

Susan Blevins, P.E.  
Manager, Chemical Section  
New Source Review Program

Enclosures

cc: Ms. Karen Kilpatrick, Manager, Air Program, Houston  
Kenneth G. Mathis, M.D., Director, Pasadena City Health  
Department, Pasadena  
Mr. Rob Barrett, Director, Harris County Pollution  
Control Department, Pasadena

New Source Review, Office of Air Quality - 7200

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