

CR&L

**Chemical Research &
Licensing Company**
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Pasadena, Texas 77507
(281) 474-0600
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VIA CERTIFIED MAIL # 7008 1830 0000 6682 9158
RETURN RECEIPT REQUESTED

December 21, 2010

Mr. Larry Starfield (6RA-D)
Deputy Regional Administrator
U.S. Environment Protection Agency, Region 6
1445 Ross Avenue, Suite 1200
Dallas, TX 75202-2733

Re: Chemical Research & Licensing
RN102904794
Flexible Air Permit No.: 32468

RECEIVED
DEC 23 2010
COMPLIANCE & ENFORCEMENT

AIR PERMITS DIVISION
DEC 27 2010
RECEIVED

Dear Mr. Starfield:

Chemical Research & Licensing (CR&L) is submitting this letter in response to your September 20, 2010 letter regarding an opportunity to confer about the Texas Flexible Permit Program. Pursuant to my telephone discussion with Ms. Patricia Capps Welton on November 23, 2010, it is my understanding that no meeting with EPA is required regarding these permitting issues. Instead, EPA has requested a letter confirming our intent to obtain a SIP-approved authorization to replace existing TCEQ Flexible Air Permit No. 32468.

In response to EPA's "Opportunity to Confer" letter, please note that CR&L does not expect that the voluntary audit program or four-step process laid out in the September 15, 2010 preliminary discussion draft entitled "*Process for Transitioning Texas Subchapter G Flexible Permits to Subchapter B NSR SIP-Approved Permits*" will be necessary to address the relatively insignificant emission limits at its Research & Development (R&D) facilities. Accordingly, as a minor source of air emissions, CR&L will work directly with TCEQ to seek an appropriate SIP-approved state authorization mechanism for our R&D facilities within one year of the date of this letter (absent the granting of an extension).

Should additional questions arise, please contact me by phone at (281) 474-0636 or by e-mail at Will.Groten@CDTECH.com. CR&L looks forward to cooperation with both EPA and TCEQ on these air permitting issues.

Sincerely,



Will A. Groten
President, Chemical Research & Licensing

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cc: John Blevins (6EN), EPA Director of Compliance Assurance & Enforcement
Jeff Robinson (6PD), EPA Air Permits Section Chief
Patricia Capps Welton (6RC), EPA Air Enforcement Branch Chief
Richard Hyde (MC 122), Deputy Director, TCEQ Air Permits Division
John Sadlier (MC 172), Deputy Director, TCEQ Enforcement Division