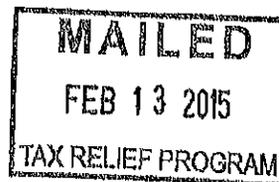


Bryan W. Shaw, Ph.D., P.E., *Chairman*
Toby Baker, *Commissioner*
Zak Covar, *Commissioner*
Richard A. Hyde, P.E., *Executive Director*



TEXAS COMMISSION ON ENVIRONMENTAL QUALITY
Protecting Texas by Reducing and Preventing Pollution

February 11, 2015

Mr. Andrej Fedor
Agent
Associated Tax Appraisers
PO Box 91119
Austin, Texas 78709

Re: Notice of Use Determinations
Derichebourg Recycling USA, Inc.
Wallisville Road Facility
7501 Wallisville Rd
Houston (Harris County)
Regulated Entity Number: RN100671254
Customer Reference Number: CN603440926
Application Number: 18145
Tracking Number: 14-TCEQ-Derichebourg-Wallisville-001

Dear Mr. Fedor:

This letter responds to Derichebourg Recycling USA, Inc.'s Application for Use Determination, received June 6, 2014, pursuant to the Texas Commission on Environmental Quality's (TCEQ) Tax Relief for Pollution Control Property Program for the Wallisville Road Facility.

The TCEQ has completed the review for application #18145 and has determined that certain property included in the application is not eligible for a Positive Use Determination. The TCEQ has issued a Positive Use Determination for the eligible property in the application in accordance with Title 30 Texas Administrative Code (TAC) §17.4 and a Negative Use Determination for the ineligible property in accordance with §17.4 and §17.6. The justification for the Negative Use Determination is provided below.

A negative determination is issued for the roofs, walls, foundations and floors of the Turnings Facility. The Turnings Facility is used as part of the production process at this facility and is not a pollution control device. The eligible portion of the facility is those items that are installed and used to control, monitor, or prevent air, water, or land pollution.

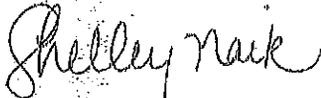
In order to request an exemption for the eligible property, the attached Use Determination Certificate and a completed Application for Pollution Control Property Tax Exemption, Form #50-248 (please see www.cpa.state.tx.us), must be provided to the chief appraiser of the appropriate appraisal district no later than April 30th of the applicable tax year.

Mr. Andrej Fedor
Page 2
February 11, 2015

Please be advised that a Use Determination may be appealed by the applicant or the chief appraiser of the applicable appraisal district. The appeal must be filed with the TCEQ Chief Clerk within 20 days after the receipt of this letter in accordance with 30 TAC §17.25.

If you have questions regarding this letter or need further assistance, please contact Ronald Hatlett of the Tax Relief for Pollution Control Property Program by telephone at (512) 239-6348, by e-mail at Ronald.Hatlett@tceq.texas.gov, or write to the Texas Commission on Environmental Quality, Tax Relief for Pollution Control Property Program, MC-110, P.O. Box 13087, Austin, Texas 78711-3087.

Sincerely,



Shelley Naik, Team Leader
Stationary Source Programs
Air Quality Division

SN/RH

Enclosure

cc: Chief Appraiser, Harris County Appraisal District, PO Box 922004, Houston, Texas
77292

The State of Texas
TEXAS COMMISSION ON ENVIRONMENTAL QUALITY



Application Number: 18145

County: Harris

USE DETERMINATION CERTIFICATE

This certifies that
Derichebourg Recycling USA, Inc.
Wallisville Road Facility
7501 Wallisville Rd
Houston, Texas

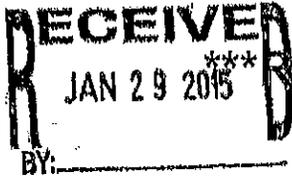
installed the following property that is used 100% for pollution control to meet or exceed federal or state regulations:
containment walls, sump, tanks, piping, and pumps used to collect cutting fluids and water.

February 11, 2015

Date

A handwritten signature in black ink, appearing to read "David Brymer".

David Brymer
Division Director



REVISED APP. 18145 1/26/14***

Rev 4

Texas Commission on Environmental Quality
Use Determination for Pollution Control Property Application

A person seeking a use determination must complete this application form. For assistance in completing the application form please refer to the Instructions for Use Determination for Pollution Control Property Application Form TCEQ-00611, as well as the rules governing the Tax Relief Program in Title 30 Texas Administrative Code Chapter 17 (30 TAC 17). Information relating to completing this application form is also available in the TCEQ regulatory guidance document, Property-Tax Exemptions for Pollution Control Property, RG-461. For additional assistance, please call the Tax Relief Program at 512-239-4900.

You must supply information for each field of this application form unless otherwise noted.

Section 1. Property/Equipment Owner Information

- 1. Company Name of Owner: Derichebourg Recycling USA, Inc
2. Mailing Address: 7501 Wallisville Road
3. City, State, Zip: Houston, TX 77020-3597
4. Customer Number (CN): CN603440926
5. Regulated Entity Number (RN): RN100671254
6. Is this property/equipment owned by the CN listed in Question 4? Yes [X] No []

If the answer is 'No,' please explain:

- 7. Is this property/equipment subject to any lease or lease-to-own agreement? Yes [] No [X]

If the answer is 'Yes,' please explain:

- 8. Is this property/equipment operated by the RN listed in Question 5? Yes [X] No []

If the answer is 'No,' please explain:

Section 2. Physical Location of Property/Equipment

- 1. Name of Facility or Unit where the property/equipment is physically located:
2. Type of Mfg. Process or Service: Scrap Metal Recycling
3. Street Address: 7501 Wallisville Rd
4. City, State, Zip: Houston, TX
5. County: Harris
6. Appraisal District Account Number(s): 1218850010001, 1044796 & 0585417

Section 3. Name of Property/Equipment Operator (If different from Owner)

1. Company Name:
2. Mailing Address:
3. City, State, Zip:
4. Customer Number (CN):
5. Regulated Entity Number (RN):

Section 4. Contact Name

1. Company Name: Associated Tax Appraisers
2. First Name of Contact: Andrej
3. Last Name of Contact: Fedor
4. Salutation: Mr. Mrs. Ms. Dr. Other:
5. Title:
6. Mailing Address: P.O. Box 91119
7. City, State, Zip: Austin, TX 78709
8. Phone Number/Fax Number: 281-497-2000(Phone) / 713-627-8454(Fax)
9. Email Address: afedor@nationalrealty.com
10. Tracking Number (optional): 14-TCEQ-Derichbourg-Wallisville-001

Section 5. General Information

1. What is the type of ownership of this facility?
Corporation Limited Partner Other:
Sole Proprietor Limited Liability Corporation
Partnership Utility
2. Size of Company: Number of Employees
1 to 99 500 to 999 2,000 to 4,999
100 to 499 1,000 to 1,999 5,000 or more
3. Business Description: (Briefly describe the type of business or activity at the facility)
Scrap Metal Recycling
4. Provide the North American Industry Classification System (NAICS) six-digit code for this facility. NAICS 421930 / SIC 5093

Section 6. Property/Equipment Description, Applicable Rule, and Environmental Benefit

For each piece, or each category, of pollution control property/equipment for which a use determination is being sought, answer the following questions.

Attach additional response sheets to the application for each piece of integrated pollution control property/equipment if a use determination is being sought for more than one (1) piece.

General Information

1. Name the property/equipment: Turnings Facility
2. Is the property/equipment used 100% as pollution control equipment? Yes No
If the answer is 'Yes,' explain how it was determined that the equipment is used 100% for pollution control: The property is in standard use and identified on the TCEQ's Tier I Table. In addition, the property was installed solely for the abatement of pollution as required by law.
3. Does the property/equipment generate a Marketable Product? Yes No
If the answer is 'Yes,' describe the marketable product:
4. What is the appropriate Tier I Table or Expedited Review List number? S-20
5. Is the property/equipment integrated pollution control equipment? Yes No
If the answer is 'No,' separate applications must be filed for each piece of property/equipment.
6. List applicable permit number(s) for the property/equipment: 31272 & TXR05V779

Incremental Cost Difference

7. Is the Tier I Table percentage based on the incremental cost difference? Yes No
If the answer is 'Yes,' answer the following questions:
8. What is the cost of the new piece of property/equipment?
9. What is the cost of the comparable property/equipment?
10. How was the value of the comparable property/equipment calculated?

Property/Equipment Description

11. Describe the property/equipment. (What is it? Where is it? How is it used?)
Building, containment walls, tanks, piping and pumps used to contain cutting fluids and water from incoming loads.

Applicable Rule

12. What adopted environmental rule or regulation is being met by the construction or installation of the property/equipment? The citation must be to the subsection level.
40 Code of Federal Regulations (CFR) Part 279.22 and 112.7

Environmental Benefit

13. What is the anticipated environmental benefit related to the construction or installation of the property/equipment?
Facility provides containment of cutting fluids and holding time for oil and water separation.

Section 7. Process Flow Diagram (Optional)

Attach documentation to the application showing a Process Flow Diagram for the property/equipment.

Section 8. Partial-Use Percentage Calculation

This section must be completed for all Tier III applications. Attach documentation to the application showing the calculations used to determine the partial-use percentage for the property/equipment.

Section 9. Property Categories and Costs

List each piece of property/equipment of integrated pollution control property/equipment for which a use determination is being sought.

Property/Equipment Name	Tier, Table No. or Expedited Review List No.	Use Percent	Estimated Dollar Value
Land: All qualifying land.	W-74	100%	
Property: Turnings Facility for Handling and Storage of Metal Working Fluids SEE ATTACHED	W-74	100%	\$1,161,818
Property:			
Total:			

Attach additional response sheets to the application if more than five (5) pieces of property/equipment need to be listed.

NOTE: Separate applications must be filed for each piece of nonintegrated pollution control property/equipment.

Section 10. Type of Application and Fee

1. Type of Application being filed: *Select only one.*

Tier I – Fee: \$150

Tier II – Fee: \$1,000

Tier III – Fee: \$2,500

2. Fee Payment Type:

Check

Money Order

Electronic Payment

3. Payment Receipt Number: See Attached

4. Payment Amount: \$150

5. Payer Name on Payment: Ronald P. Little

6. Total Amount of Payment: \$150

NOTE: Enclose a check, money order to the TCEQ, or a copy of the ePay receipt along with the application to cover the required fee.

In accordance with the TCEQ's Delinquent Fee Protocol, the Tax Relief Program will not consider applications administratively complete until all delinquent fees the company owes to the TCEQ are paid.

Information regarding the TCEQ's Delinquent Fee Protocol is available at:

<http://www.tceq.state.tx.us/agency/delin/index.html>.

Section 11. Certification Statement

Must be signed by owner or designated representative.

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I further certify that the property/equipment listed in this application is eligible for a tax exemption under Texas Tax Code, §11.31 given that:

- the property/equipment is not solely used, constructed, acquired, or installed to manufacture or produce a good or provide a service, including a good or service that prevents, monitors, controls, or reduces air, water or land pollution,
- the environmental benefit associated with the property/equipment is not wholly derived from the use or characteristics of the goods or services produced by the property/equipment,
- the property/equipment is wholly or partly used, constructed, acquired, or installed to meet or exceed law, rule, regulation adopted by an environmental protection agency of the United States, Texas, or a political subdivision of Texas for the prevention, monitoring, control, or reduction of air, water, or land pollution,
- the property/equipment is not used for residential purposes, or for recreational, park, or scenic uses as defined by Texas Tax Code, §23.81,
- the property/equipment is not a motor vehicle, except for a dedicated service motor vehicle used solely for pollution control, and
- the property/equipment was not acquired, constructed, or installed before January 1, 1994.

I am aware there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Printed Name:

Date: 6/5/14

Signature:


Andrej Fodor

Title:

Company Name: Associated Tax Appraisers

Under Texas Penal Code 37.10, if you make a false statement on this application, you could receive a jail term of up to one year and a fine up to \$2,000, or a prison term of two to 10 years and a fine of up to \$5,000.

Application Submission

Send the completed application and the appropriate fee, along with a complete copy of the completed application for the appraisal district, to:

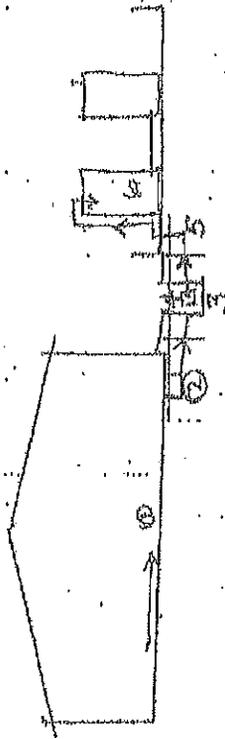
U.S. Mail

Cashiers Office, MC 214
Tax Relief Program
TCEQ
PO Box 13088
Austin TX 78711-3088

Physical Address

Cashier's Office, MC 214
Building A
TCEQ
12100 Park 35 Circle
Austin TX 78753

Process Flow Diagram



Building floor flows to sump which gravity feeds to lift station which pumps water and oil through pipe to storage tanks.

Water and oil is removed from the tanks with vacuum trucks for off-site disposal.



Derichebourg Recycling USA

Recycling Building
Houston, Texas

Revised February 9, 2012

IKON Environmental Solutions, LP proposes to construct a recycling building for Derichebourg Recycling USA at the existing facility in Houston, Texas, as described herein.

Submitted By:
Greg Blomquist
Vice President

IKON Environmental Solutions, LP
10660 Somerset Lane
Houston, Texas 77093
Phone: 281-766-1KON
Fax: 281-973-0010
gblomquist@ikonenviro.com

Sitework, Foundation, and Concrete Work

Engineering and Architectural Services

- ▶ Superior Building Systems shall design the foundation for the new building.

Sitework ¹

- ▶ Sitework shall be by IKON
 - ▶ All stockpiled material will be relocated on site.
 - ▶ Existing soil will be stabilized using hydrated lime to a depth of 1'.

Foundation ²

- ▶ Concrete work to construct the foundation and slab shall include:
 - ▶ Piers 12 total - 20" diameter 60" bells - 10" deep.
 - ▶ Caps 12 - 24" x 24" x 24" 4,000 psi concrete
 - ▶ Grade Beams 410 LE - 2.5' x 16" 4,000 psi concrete
 - ▶ Slab on Grade 10,000 s.f. - 13" thick with 2 mats of #5 rebar @ 12" with 4,000 psi concrete.
 - ▶ Retaining Wall 395' X 10' x 12" thick with 2 mats of #5 rebar @ 12" o.c.e.w. 4,000psi concrete.

Notes: All concrete is 4,000 psi with 1 1/2" aggregate and 4" slump unless noted otherwise.

Pre-Engineered Building Specifications

General Notes

- ▶ The building shall measure 80'-0" wide and 125'-0" long, with a 30'-0" eave height and a 1 on 12 roof slope. The building shall consist of five (5) 25'-0" bays, clear span no interior columns.
 - ▶ The building shall be designed to support a 10 ton top running crane, brackets, beams, cap and rail for 125' crane run is included.

¹ All sitework is proposed in accordance with preliminary information for bidding purposes pending receipt of a soils report. Upon receipt and review of the soils report, any changes arising from conditions at the site such as subsurface or otherwise concealed or unknown physical conditions of an unusual nature which differ from those ordinarily found to exist causing an increase or decrease in the cost of, or time required for performance of any part of the work, will be furnished to Owner for further observation and investigation with a request for final determination. Any costs arising from such conditions shall be for the Owner's account.

² IKON will exercise proper caution and care in the installation of the foundation; however, if any existing sewer lines, gas lines, water lines, or electrical conduit lines are damaged as a result of our operations, IKON cannot assume the cost of repairs to these lines, and the Owner agrees to indemnify and hold harmless IKON and its subcontractors from any claims or damages resulting. IKON does, however, guarantee prompt and complete repairs on a non-profit basis for the Owner's account.

If adequate soil bearing for the foundation as described herein is not obtained within a maximum of 10'-0" in depth, an additional charge may be applicable.

- ▶ The building columns shall start at the top of the 10 high wall to provide a building with a 40' eave height above finish floor.

Design Load Criteria

- ▶ The following loads have been considered in the building design:
 - ▶ The dead load of all structural materials which form a permanent part of the completed structure
 - ▶ Roof live load of 20 PSF, with tributary reduction allowed
 - ▶ Wind velocity of 110 MPH, Exposure "C"
 - ▶ Collateral load of 5 PSF
 - ▶ Seismic loads of $S_s = 0.088$ and $S_1 = 0.036$, Importance 1.0
 - ▶ Combinations applied as recommended by IBC 2006
- ▶ A bent of full and typical size shall be used at the new endwall of the building for added structural integrity, with typical connections for girts and purlins to facilitate future extensions. Endwall materials shall be designed and connected so as to be easily removable and reusable.

Primary and Secondary Framing

- ▶ The building shall be rigid frame, purlin and girt type construction.
- ▶ Primary structural framing members shall be fabricated from structural plates and shapes.
 - ▶ The "AISC Specifications for the Design, Fabrication and Erection of Structural Steel for Buildings" relating to design requirements and allowable stresses shall be utilized in the rigid frame design
- ▶ Secondary structural framing members (purlins, girts, etc.) shall be fabricated from cold-formed material.
 - ▶ The "AISI Specifications for the Design of Cold-Formed Steel Structural Members" shall be utilized for secondary structural member design

Finish of Primary and Secondary Members

- ▶ All primary structural steel members shall be hand-tool cleaned in accordance with SSPC SP-2 and shall receive one shop coat of standard red oxide primer.
- ▶ All secondary structural steel members shall be roll formed from coil material with a factory-applied, baked-on red oxide primer.

Pre-Engineered Building Specifications, Continued

Paneling and Trim

- ▶ The roof and wall panels of the building shall be purlin bearing R-profile rolled from 26 gauge coil material.
 - ▶ Finish shall be Galvalume® or equal aluminum-zinc alloy coating
 - ▶ Roofing components shall meet or exceed requirement of UL-90 uplift rating

- ▼ Cadmium-plated carbon steel self-tapping fasteners with loose steel and neoprene washers, painted to complement adjacent panels, shall be used to attach the panels to the secondary members.
- ▼ Trim, flashing, gutters and downspouts shall be fabricated from 26 gauge coil material.
 - ▼ Finish shall be silicone polyester over Galvalume® or equal substrate
 - ▼ The color shall be selected from the manufacturer's standard color chart
- ▼ Closed cell, pre-formed closure strips having a profile matching the panel configuration shall be provided for weathertightness at the eave, rake and ridge.

Ventilation

- ▼ Roof mounted Exhaust fans and wall louvers shall be supplied to provide 10 air changes per hour.

Pre-Engineered Building Accessories

- ▼ One framed opening for access 22' wide x 20' high.

Fluid Recovery and Storage System

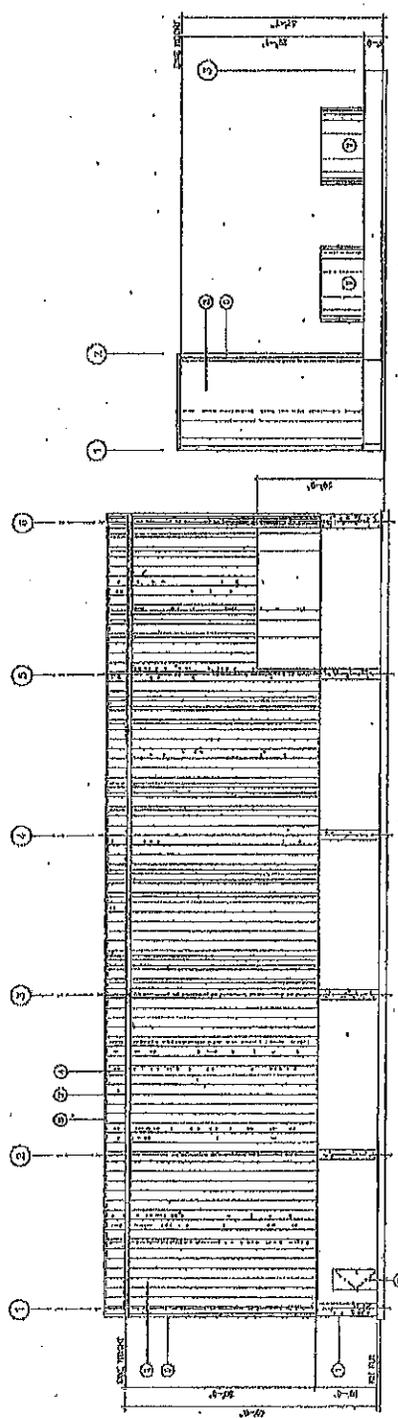
- ▼ Tankage, piping and pumps will be installed to handle cutting fluids and water from incoming loads.
- ▼ Tanks will provide holding time for oil and water to separate. Water will be pumped from tanks and disposed of off site.
- ▼ Exact equipment has not been specified, more information will be needed to specify exact equipment required. Information such as throughput volume and oil content (separation efficiency) will be used to design treatment system.
- ▼ Site Concrete (For fluid recovery and storage system)
 - ▼ Containment walls measuring 128' x 4' x 8" thick with 1 mat of #5 @ 12" o.c.e.w. 4,000 psi concrete will be constructed to accommodate a water treatment system and storage tanks.
 - ▼ Construct sump for liquids collection 10' x 10' x 4' deep with 8" thick walls with 1 mat of #5 @ 12" o.c.e.w. 4,000 psi concrete.
 - ▼ Construct 12" x 12" trench with frame and grates in the middle of the floor draining to a collection point.

Electrical

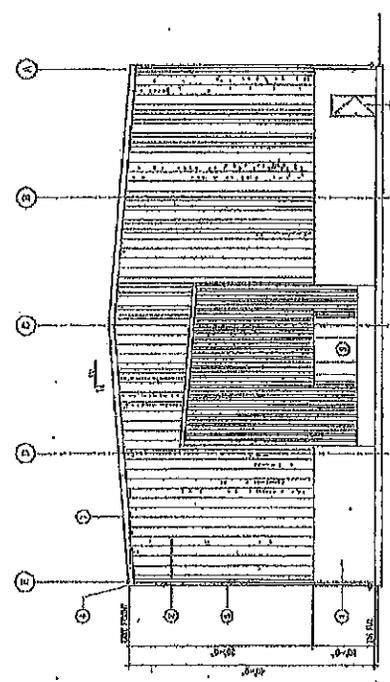
- ▼ (16) 6 lamp TS high bay lights
- ▼ 4 emergency exit lights
- ▼ 4 exterior egress lights
- ▼ 6 400 W wall packs
- ▼ Hook up of exhaust fans
- ▼ 100 amp feeder to crane rail
- ▼ 400A MLO 277/480V panel
- ▼ 30kva XFMR
- ▼ 100A MCB 120/208V Panel
- ▼ 400amp 480v disconnect

- ▶ 30 400A Service Feeder
- ▶ Grounding▶
- ▶ Electrical Drawings





SOUTH EXTERIOR ELEVATION



EAST EXTERIOR ELEVATION

1. THIS DRAWING IS A PART OF THE PROJECT'S ARCHITECTURAL RECORD. IT IS THE PROPERTY OF BUILDING SYSTEMS, INC. AND IS NOT TO BE REPRODUCED OR TRANSMITTED IN ANY FORM OR BY ANY MEANS, ELECTRONIC OR MECHANICAL, INCLUDING PHOTOCOPYING, RECORDING, OR BY ANY INFORMATION STORAGE AND RETRIEVAL SYSTEM, WITHOUT THE WRITTEN PERMISSION OF BUILDING SYSTEMS, INC.



RECYCLING BUILDING
FOR
BERKELEY RECYCLING USA
HOUSTON TEXAS

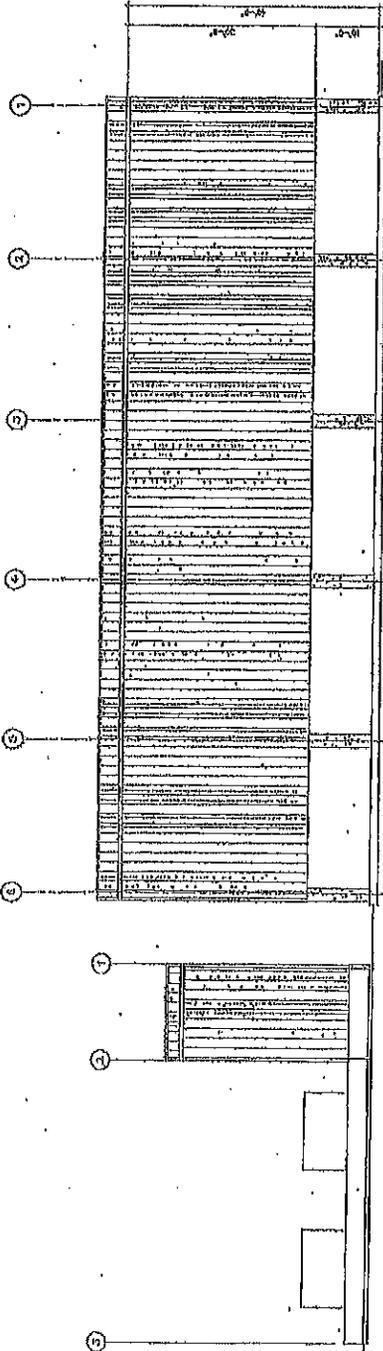
Scale: 1/8" = 1'-0"

Sheet: 1 of 2
Date: 10/12/07
Author: J. B. BAKER

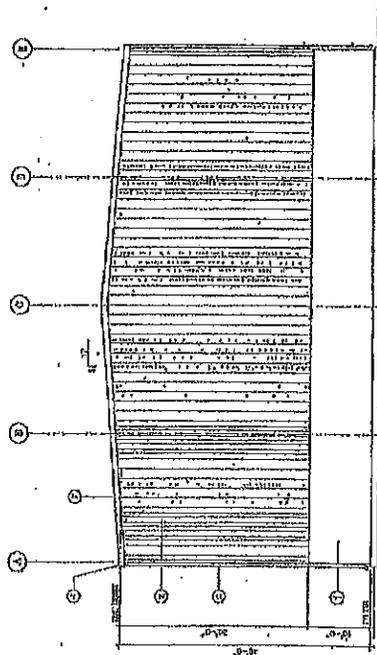
Project No. A3.2

Sheet Title
EXTERIOR
ELEVATIONS

Project Number: A3.2
Sheet No. A3.2

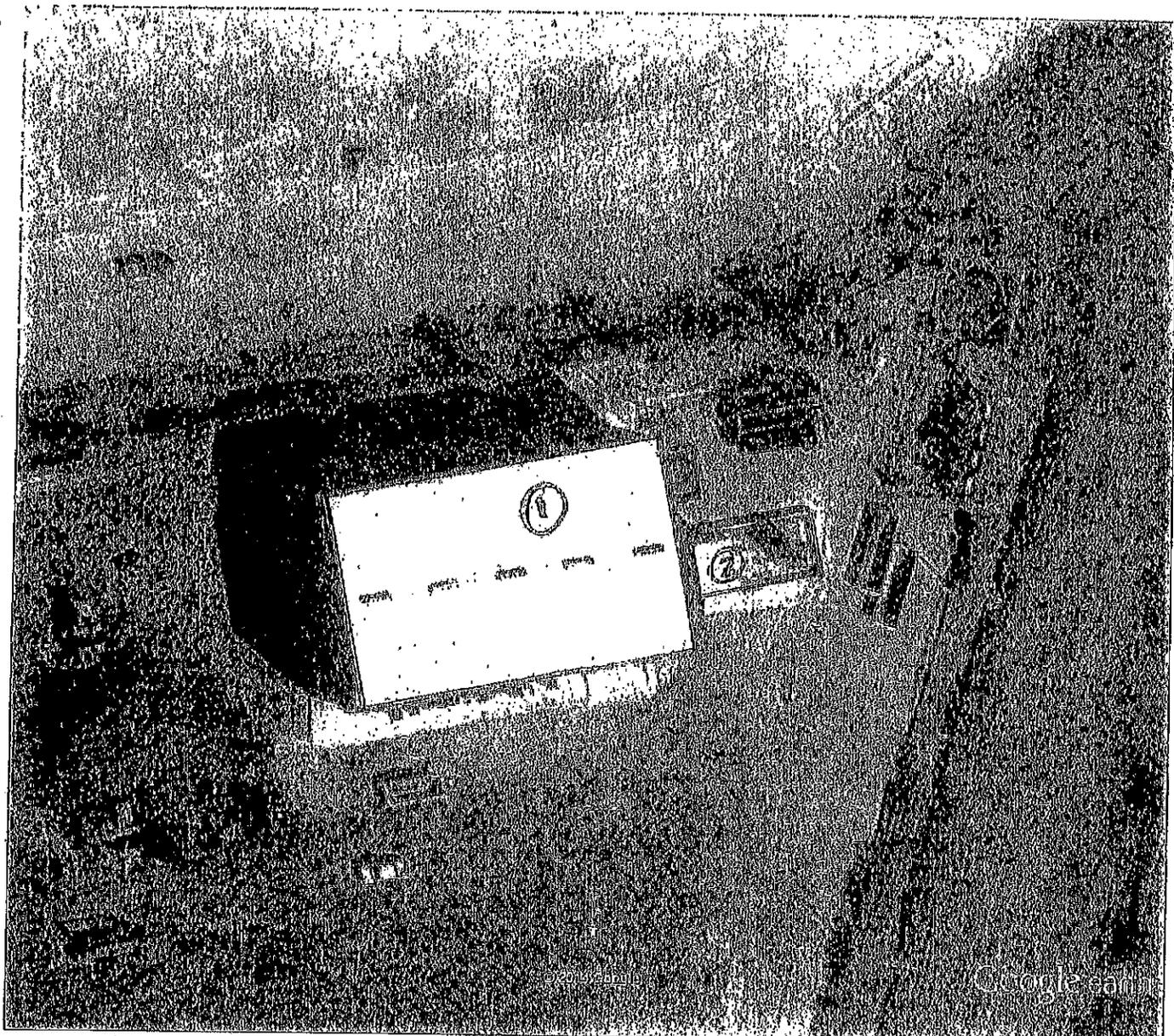


NORTH EXTERIOR

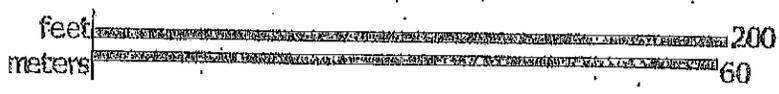


WEST ELEVATION

NOTES TO SHEET



Google earth



① 10,000 sq. ft. = 125' x 80'

② 960 sq. ft. = 40' x 24'

③ 200 sq. ft. = 20' x 10'

Total: 11,160 sq. ft.

Andrej Fedor

From: Andrej Fedor
Sent: Tuesday, January 27, 2016 12:12 PM
To: 'Ronald Hatlett'
Subject: RE: TCEQ Use Determination App. 18145; Deerichembourg Recycling USA; 7501 Wallisville Rd.
Attachments: (01.27.15) Revised TCEQ App.pdf

Mr. Hatlett,

Attached is Derichembourg Recycling USA's response to the TCEQ's Notice of Deficiency dated December 11, 2014, regarding its technical review of Application No. 18145. We sent the original by certified mail today, along with the appropriate number of copies.

We look forward to receiving your findings. Please do not hesitate to request any additional information.

Thank you,

Andrej Fedor
Associated Tax Appraisers
4543 Post Oak Place, Suite 232
Houston, Texas 77027
Telephone: (281) 497-2200
Facsimile: (713) 627-8454
Email: afedor@nationalrealty.com

From: Ronald Hatlett [mailto:ronald.hatlett@tceq.texas.gov]
Sent: Monday, January 12, 2015 7:51 AM
To: Andrej Fedor
Subject: Re: TCEQ Use Determination App. 18145; Deerichembourg Recycling USA; 7501 Wallisville Rd.

A two week extension is granted.

Sent using OWA for iPad

From: Andrej Fedor <afedor@nationalrealty.com>
Sent: Friday, January 09, 2015 5:02:03 PM
To: Ronald Hatlett
Subject: TCEQ Use Determination App. 18145; Deerichembourg Recycling USA; 7501 Wallisville Rd.

Good Afternoon,

We have a deadline to respond to a Notice of Deficiency regard the above-referenced Use Determination Application by January 13, 2015. Please allow this email to request a short extension to file our response.

Thank you,

Andrej Fedor
Associated Tax Appraisers
4543 Post Oak Place, Suite 232
Houston, Texas 77027
Telephone: (281) 497-2200
Facsimile: (713) 627-8454
Email: afedor@nationalrealty.com

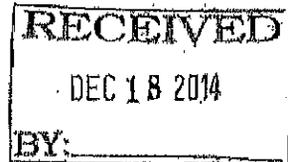
1/27/2015

Bryan W. Shaw, Ph.D., P.E., *Chairman*
Toby Baker, *Commissioner*
Zak Covar, *Commissioner*
Richard A. Hyde, P.E., *Executive Director*



TEXAS COMMISSION ON ENVIRONMENTAL QUALITY
Protecting Texas by Reducing and Preventing Pollution

December 11, 2014



Mr. Andrej Fedor
Agent
Associated Tax Appraisers
PO Box 91119
Austin, Texas 78709

Re: Notice of Technical Deficiency
Derichebourg Recycling USA, Inc.
Wallisville Road Facility
7501 Wallisville Rd
Houston (Harris County)
Regulated Entity Number: RN100671254
Customer Reference Number: CN603440926
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Tracking Number: 14-TCEQ-Derichebourg-Wallisville-001

Dear Mr. Fedor:

This letter responds to Derichebourg Recycling USA, Inc.'s Application for Use Determination, received June 6, 2014, pursuant to the Texas Commission on Environmental Quality's (TCEQ) Tax Relief for Pollution Control Property Program for the Wallisville Road Facility.

The TCEQ has conducted a technical review and has determined that the information required in 30 Texas Administrative Code (TAC) §17.10 is incomplete for application #18145. Please revise the application to include the following information and include a copy of this letter with your response.

Please provide a detailed description of the business operations that occur within the building including an explanation of how the oils and greases are separated from the turnings. Please note that roofs, walls, foundations, and floors of buildings are eligible for a positive use determination only when there is an adopted environmental rule or regulation requiring the activity to occur within an enclosed structure. Based on the description provided in the notice of deficiency response the eligible items listed on this application are the containment walls, sump, tanks, piping, pumps, and the land designated as area #2.

Mr. Andrej Fedor
Page 2
December 11, 2014

The TCEQ appreciates your response in this matter. The revised application must be submitted by January 13, 2015, to the TCEQ Tax Relief for Pollution Control Property Program, MC-110; P.O. Box 13087, Austin, Texas 78711-3087. Failure to submit a complete application, including the requested information, may result in your application being voided and the associated application fee being forfeited in accordance with 30 TAC §17.20(b).

If you have questions regarding this letter or need further assistance, please contact Ronald Hatlett of the Tax Relief for Pollution Control Property Program by telephone at (512) 239-6348, by e-mail at Ronald.Hatlett@tceq.texas.gov, or write to the Texas Commission on Environmental Quality, Tax Relief for Pollution Control Property Program, MC-110, P.O. Box 13087, Austin, Texas 78711-3087.

Sincerely,



Shelley Naik, Team Leader
Stationary Source Programs
Air Quality Division

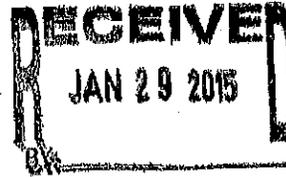
SN/RH

Enclosure

ASSOCIATED TAX APPRAISERS

AD VALOREM TAX CONSULTANTS

January 27, 2015



*Sent Certified Mail RR# 7014 0150 0001 6180 8961
And VIA Email: Ronald Hatlett [ronald.hatlett@tceq.texas.gov]*

Texas Commission on Environmental Quality
Tax Relief for Pollution Control Property Program
MC-110, P.O. Box 13087
Austin, Texas 78711-3087

**Re: Response to Notice of Technical Deficiency Dated October 28, 2014
Derichebourg Recycling USA, Inc.
Wallisville Road Facility
7501 Wallisville Rd
Houston (Harris County)
Regulated Entity Number: RN100671254
Customer Reference Number: CN603440926
Application Number: 18145
Tracking Number: 14-TCEQ-Derichebourg-Wallisville-001**

To Whom It May Concern:

Please allow this letter to serve as a formal response to the TCEQ's Notice of Technical Deficiency dated December 11, 2014, regarding Derichebourg Recycling USA's Application for Use Determination for Pollution Control Property referenced above. As requested, enclosed please find the original and one (1) copy of the revised Use Determination for Pollution Control Property Application, along with a copy of the Notice of Deficiency. Further, the following are responses to each of the issues raised by the Notice of Deficiency:

1. 40 Code of Federal Regulations (CFR) Part 112.7 Subpart C requires Derichebourg Recycling USA to provide appropriate containment and/or diversionary structures or equipment to prevent a discharge, including but not limited to walls and floor. The **entire** containment system must be capable of containing oil and must be constructed so that any discharge from a primary containment system will not escape the containment system before cleanup occurs.

The entire Turnings Facility is constructed on leak proof concrete pads, which are designed to be self-contained and rain proof in order to control contamination. The facility has drains on the pads in order to collect liquids, which are pumped into two high capacity tanks.

When a truck offloads containers full of turnings at the facility, the majority of oil will have decanted on the containers' floor. For this reason, the containers are equipped with a ball valve, which is opened to allow oil can be collected. The turnings are then removed from their containers and any remaining oil is captured.

If there are any addition materials or information that the TCEQ may need or require, please do not hesitate to contact us. We appreciate your cooperation in this matter and look forward to hearing from you.

Sincerely yours,

Associated Tax Appraisers

A handwritten signature in black ink, appearing to read "A. Fedor" or similar, written over the typed name.

Andrej Fedor
AF/af