

Derek Seal
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December 30, 2022

Via Electronic Mail: laurie.gharis@tceq.texas.gov (with enclosures)

Via TCEQ eFiling System (without enclosures)

Ms. Laurie Gharis, Chief Clerk
Attention: Mehgan Taack
Texas Commission on Environmental Quality
12100 Park 35 Circle, Building F
Austin, TX 78753

RE: *Application of Exflur Research Corporation for TCEQ Proposed Air Quality Permit No 165848; RN110969227; TCEQ Docket No. 2022-1552-AIR Administrative Record*

Dear Ms. Gharis:

Pursuant to 30 TEX. ADMIN. CODE § 80.118(d), Exflur Research Corporation (“Exflur”) submits the Applicant’s Bates-labeled Application Materials and Application Materials Index to the Texas Commission on Environmental Quality (“TCEQ”) Chief Clerk via electronic mail for inclusion in the administrative record in the above-referenced matter.

The documents were obtained from the files of the Chief Clerk of the TCEQ, from the TCEQ Air Permits Division, from the TCEQ Commissioners Integrated Database, and from Exflur’s files. Duplicates of the same documents from different sources have not been included. The documents are included in chronological order to the extent possible, from the date of filing of the application through the TCEQ Commission’s Interim Order referring the application to a contested case hearing. Any guidance materials referenced in the materials which are being filed are incorporated into the application materials by reference. Comments which are publicly available in the TCEQ Commissioner’s Integrated Database have not been included. Lastly, as indicated in the Application Materials Index, certain materials will be filed separately as confidential, which Exflur will provide to parties admitted as such by the Administrative Law Judge pursuant to a standard protective order.

If you have any questions or need information provided in an alternative format, please do not hesitate to contact me.

Laurie Gharis
December 30, 2022
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Sincerely yours,

A handwritten signature in black ink, appearing to read "Derek Seal". The signature is fluid and cursive, with the first name "Derek" being more prominent than the last name "Seal".

Derek Seal

TCEQ DOCKET NO. 2022-1552-AIR

**APPLICATION BY
EXFLUOR RESEARCH CORPORATION FOR
TCEQ AIR QUALITY
PERMIT NO. 165848**

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**BEFORE THE
STATE OFFICE OF
ADMINISTRATIVE HEARINGS**

EXFLUOR RESEARCH CORPORATION APPLICATION MATERIALS INDEX TCEQ PERMIT NO. 165848			
App. Ex.	Bates	Date	Document Description
1	APP-00001- APP-00157	7/7/21	Initial Application <i>(Source - TCEQ ED Files)</i>
1B	APP-00158	7/7/21	CONFIDENTIAL APPLICATION MATERIALS FILED SEPARATELY <i>(Source – Applicant’s Consultant Engineer’s Files)</i>
2	APP-00159- APP-00186	7/9-7/21/21	TCEQ ED Administrative Materials/Correspondence <i>(Source - TCEQ ED Files)</i>
3	APP-00187- APP-00204	7/14/21	TCEQ ED – Declaration of Administrative Completeness & Notice of Receipt of Application and Intent to Obtain Air Permit (NORI) Public Notice Documents <i>(Source – TCEQ Chief Clerk Files)</i>
4	APP-00205- APP-00206	7/14/21	Legislative Letter <i>(Source – TCEQ Commissioners’ Integrated Database (CID))</i>
5	APP-00207- APP-00212	7/15/21	TCEQ Chief Clerk’s NORI Mailing List <i>(Source – TCEQ Chief Clerk Files)</i>
6	APP-00213- APP-00229	7/28-29/21	NORI Proof of Publication (Affidavits/Tearsheets for English and Bilingual) <i>(Source – TCEQ Chief Clerk Files)</i>
7	APP-00230- APP-00309	9/2/21	Response to TCEQ ED Application Questions <i>(Source - TCEQ ED Files)</i>
7A	APP-00310	9/2/21	Response to TCEQ ED Application Questions CONFIDENTIAL MATERIALS FILED SEPARATELY <i>(Source – Applicant’s Consultant Engineer’s Files)</i>
8	APP-00311- APP-00318	9/7/21	NORI Public Notice Verification Form
9	APP-00319- APP00367	10/18/21	Response to TCEQ ED Request for Information <i>(Source - Applicant’s Consultant Engineer’s Files)</i>
10	APP-00368- APP-00383	11/5/22	Applicant’s Comments on the Electronic Modeling Evaluation Workbook (EMEW) Review Response <i>(Source - Applicant’s Consultant Engineer’s Files)</i>
10A	APP-00384	7/21	EMEW Review Response CONFIDENTIAL MATERIALS FILED SEPARATELY <i>(Source - Applicant’s Consultant Engineer’s Files)</i>
11	APP-00385- APP-00422	11/10-16/21	Response to TCEQ ED Request on 11/8/21 and 11/15/21 for Information Regarding the Air Quality Analysis <i>(Source - Applicant’s Consultant Engineer’s Files)</i>

**EXFLUOR RESEARCH CORPORATION
APPLICATION MATERIALS INDEX
TCEQ PERMIT NO. 165848**

App. Ex.	Bates	Date	Document Description
12	APP-00423-APP-00431	11/18/21	TCEQ ED Air Quality Analysis Audit/Internal Correspondence <i>(Source - TCEQ ED Files)</i>
13	APP-00432-APP-00451	11/9/21-2/9/22	TCEQ and Applicant Correspondence on Draft Special Conditions and MAERT and Other Matters <i>(Source - TCEQ ED Files)</i>
14	APP-00452-APP-00454	2/17/22	Legislative Letter <i>(Source - TCEQ ED Files)</i>
15	APP-00455-APP-00478	2/23/22	TCEQ ED – Notice of Application and Preliminary Decision for an Air Quality Permit (NAPD) Public Notice Documents, Including the Draft Permit <i>(Source – TCEQ Chief Clerk Files)</i>
16	APP-00479-APP-00482	2/24/22	TCEQ Chief Clerk’s NAPD Mailing List <i>(Source – TCEQ Chief Clerk Files)</i>
17	APP-00483-APP-00492	3/6-3/10/22	NAPD Proof of Publication (Affidavits/Tearsheets for English and Bilingual) <i>(Source – TCEQ Chief Clerk Files)</i>
18	APP-00493-APP-00498	3/24/22	TCEQ ED and Applicant Bilingual Public Notice Correspondence <i>(Source - TCEQ ED Files)</i>
19	APP-00499-APP-00543	4/4-12/22	TCEQ ED and Applicant Sign-Posting Notice Correspondence <i>(Source - TCEQ ED Files; Applicant’s Consultant Engineer’s Files)</i>
20	APP-00544-APP-00568	4/27/22	TCEQ ED – Amended/Consolidated NORI/NAPD Public Notice Documents, Including the Draft Permit <i>(Source – TCEQ Chief Clerk Files)</i>
21	APP-00569-APP-00573	4/27/-5/2/22	TCEQ ED and Applicant Correspondence on Amended/Consolidated NORI/NAPD Public Notice <i>(Source - TCEQ ED Files)</i>
22	APP-00574-APP-00585	4/29/22	TCEQ Chief Clerk’s Amended/Consolidated NORI/NAPD Mailing List <i>(Source – TCEQ Chief Clerk Files)</i>
23	APP-00586-APP-00588	4/27-28/22	TCEQ and Applicant Correspondence on Draft Special Conditions <i>(Source - TCEQ ED Files)</i>
24	APP-00589-APP-00596	5/4/22	Amended/Consolidated and Corrected NORI/NAPD Proof of Publication (Affidavits/Tearsheets for English Version) <i>(Source – TCEQ Chief Clerk Files; TCEQ ED Files)</i>
25	APP-00597-APP-00603	5/2-5/13	TCEQ Chief Clerk and Applicant Correspondence on Public Meeting Notice <i>(Source - TCEQ Chief Clerk Files)</i>
26	APP-00604-APP-00621	5/19/22	Amended/Consolidated and Corrected NORI/NAPD Proof of Publication (Affidavits/Tearsheets for Bilingual Version) <i>(Source – TCEQ Chief Clerk Files; TCEQ ED Files)</i>

**EXFLUOR RESEARCH CORPORATION
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App. Ex.	Bates	Date	Document Description
27	APP-00622- APP-00635	5/17/22	Chief Clerk Mailing of Public Meeting Notice, Including Texas Register Verification of Public Meeting Notice for May 27, 2022 Publication <i>(Source - TCEQ Chief Clerk Files)</i>
28	APP-00636- APP-00652	5/23/22	Chief Clerk Mailing of Amended Public Meeting Notice, Including Texas Register Verification of Public Meeting Notice for June 3, 2022 Publication <i>(Source - TCEQ Chief Clerk Files)</i>
29	APP-00653- APP-00694	6/16/22	Public Meeting Materials <i>(Source - TCEQ Chief Clerk Files)</i>
30	APP-00695- APP-00727	9/1/22	TCEQ ED's Response to Comments <i>(Source - TCEQ Chief Clerk Files)</i>
31	APP-00728- APP-00733	9/12/22	Amended/Consolidated and NORI/NAPD Public Notice Verification Form <i>(Source - TCEQ Chief Clerk Files)</i>
32	APP-00734- APP-00780	9/13/22	Final ED Decision Letter and Mailing of TCEQ ED's RTC <i>(Source - TCEQ Chief Clerk Files)</i>
33	APP-00781- APP-00799	11/9/22	TCEQ Chief Clerk Mailing of the December 14, 2022 TCEQ Commission Agenda Date <i>(Source - TCEQ Chief Clerk Files)</i>
34	APP-00800- APP-00801	12/5/22	Legislative Letter <i>(Source - TCEQ Chief Clerk Files)</i>
35	APP-00802- APP-00825	11/21/22	TCEQ Office of Public Interest Counsel's Response to Requests for Hearing and Request for Reconsideration <i>(Source - TCEQ Chief Clerk Files)</i>
36	APP-00826- APP-00887	11/21/22	Applicant Exflur Research Corporation's Response to Hearing Requests and Requests for Reconsideration <i>(Source - TCEQ Chief Clerk Files)</i>
37	APP-00888- APP-00941	11/21/22	TCEQ ED - Response to Hearing Requests and Response to Requests for Reconsideration <i>(Source - TCEQ Chief Clerk Files)</i>
38	APP-00942- APP-00967	11/21/22	TCEQ ED - Backup Material <i>(Source - TCEQ Chief Clerk Files)</i>
39	APP-00968- APP-01044	11/21-12/5/22	Shannon White-Shubert Reply <i>(Source - TCEQ Chief Clerk Files)</i>
40	APP-01045- APP-01120	12/5/22	North San Gabriel Alliance's Reply to Responses <i>(Source - TCEQ Chief Clerk Files)</i>
41	APP-01121- APP-01129	12/5/22	Hearing Requestor Elizabeth Ann Friou's Reply to Responses to Hearing Request <i>(Source - TCEQ Chief Clerk Files)</i>
42	APP-01130- APP-01137	12/5/22	TCEQ ED - Supplemental Commission Backup Material <i>(Source - TCEQ Chief Clerk Files)</i>
43	APP-00138- APP-01141	12/13/22	TCEQ ED and Applicant Correspondence on Availability of Permitting Files <i>(Source - Applicant's Files)</i>

**EXFLUOR RESEARCH CORPORATION
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TCEQ PERMIT NO. 165848**

App. Ex.	Bates	Date	Document Description
44	APP-01142- APP-01159	12/22/22	TCEQ Commission Interim Order <i>(Source – TCEQ Chief Clerk Files)</i>

Application Exhibit 1

Initial Application



Exflur Research Corporation | 2350 Double Creek Drive Round Rock, Texas 78664 USA | (512)310-9044

July 7, 2021

Air Permits Initial Review Team (APIRT) – MC 161
Texas Commission on Environmental Quality
P.O. Box 13087
Austin, TX 78711-3087

Submitted via STEERS

Re: Exflur Research Corporation
Air Permit Application for New Site
Florence, Williamson County
Regulated Entity No. RN110969227
Customer Reference No. CN602696791

Attn: APIRT

On behalf of Exflur Research Corporation, I am submitting this non-confidential portion of an air permit application for a proposed new facility located near Florence, Texas.

An electronic version of the Form PI-1 has been uploaded to STEERS along with the required supporting documentation. Additionally, the permit fee has been paid. The Process Description, Process Flow Diagram, and emission rate calculations are confidential and are included in a separate confidential submittal.

If you have any questions, please contact me at (512) 310-9044 or bierschenk_t@exflur.com.

Sincerely,

Thomas R. Bierschenk
Vice President
TRB/Attachments

Texas Commission on Environmental Quality
Permit Application For Florence Site

Volume 1 – Non-Confidential Information

Exflur Research Corporation


Florence, Williamson County
Air Quality Account ID No. None
Regulated Entity No. RN110969227
Customer No. CN602696791

July 2021

Prepared and Approved by


Joerg Windolph, P.E.
Principal Engineer




7/7/2021

Waid Corporation dba Waid Environmental
Certificate of Registration No. F-58

Document based on information provided by
Exflur Research Corporation
Waid Project No. EXF14242



Austin Office

13785 Research Blvd., Suite 100, Austin, Texas 78750
512.255.9999 • 512.255.8780 FAX

Houston Office

1325 Space Park Dr., Suite D, Houston, Texas 77058
281.333.9990 • 512.255.8780 FAX

**Texas Commission on Environmental Quality
Form PI-1 General Application
General**

July 2021
Permit No.: TBA
Exflur Research Corporation

I. Applicant Information	
<p style="color: red; margin: 0;">I acknowledge that I am submitting an authorized TCEQ application workbook and any necessary attachments. Except for inputting the requested data and adjusting row height and column width, I have not changed the TCEQ application workbook in any way, including but not limited to changing formulas, formatting, content, or protections.</p>	I agree
A. Company Information	
Company or Legal Name:	Exflur Research Corporation
<p>Permits are issued to either the facility owner or operator, commonly referred to as the applicant or permit holder. List the legal name of the company, corporation, partnership, or person who is applying for the permit. We will verify the legal name with the Texas Secretary of State at (512) 463-5555 or at the link below:</p> <p>https://www.sos.state.tx.us</p>	
Texas Secretary of State Charter/Registration Number (if given):	0041513100
B. Company Official Contact Information: must not be a consultant	
Prefix (Mr., Ms., Dr., etc.):	Mr.
First Name:	Thomas
Last Name:	Bierschenk
Title:	Vice President
Mailing Address:	2350 Double Creek Dr.
Address Line 2:	
City:	Round Rock
State:	Texas
ZIP Code:	78664
Telephone Number:	512-310-9044
Fax Number:	512-310-9045
Email Address:	bierschenk_t@exflur.com
C. Technical Contact Information: This person must have the authority to make binding agreements and representations on behalf of the applicant and may be a consultant. Additional technical contact(s) can be provided in a cover letter.	
Prefix (Mr., Ms., Dr., etc.):	Mr.
First Name:	Thomas
Last Name:	Bierschenk
Title:	Vice President
Company or Legal Name:	Exflur Research Corporation
Mailing Address:	2350 Double Creek Dr.
Address Line 2:	
City:	Round Rock
State:	Texas
ZIP Code:	78664
Telephone Number:	512-310-9044
Fax Number:	512-310-9045
Email Address:	bierschenk_t@exflur.com
D. Assigned Numbers	
<p>The CN and RN below are assigned when a Core Data Form is initially submitted to the Central Registry. The RN is also assigned if the agency has conducted an investigation or if the agency has issued an enforcement action. If these numbers have not yet been assigned, leave these questions blank and include a Core Data Form with your application submittal. See Section VI.B. below for additional information.</p>	
<p>Enter the CN. The CN is a unique number given to each business, governmental body, association, individual, or other entity that owns, operates, is responsible for, or is affiliated with a regulated entity.</p>	CN602696791
<p>Enter the RN. The RN is a unique agency assigned number given to each person, organization, place, or thing that is of environmental interest to us and where regulated activities will occur. The RN replaces existing air account numbers. The RN for portable units is assigned to the unit itself, and that same RN should be used when applying for authorization at a different location.</p>	RN110969227

Texas Commission on Environmental Quality
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 Exflur Research Corporation

II. Delinquent Fees and Penalties

Does the applicant have unpaid delinquent fees and/or penalties owed to the TCEQ?
 This form will not be processed until all delinquent fees and/or penalties owed to the TCEQ or the Office of the Attorney General on behalf of the TCEQ are paid in accordance with the Delinquent Fee and Penalty Protocol. For more information regarding Delinquent Fees and Penalties, go to the TCEQ Web site at the link below:
<https://www.tceq.texas.gov/agency/financial/fees/delin>

No

III. Permit Information

A. Permit and Action Type (multiple may be selected, leave no blanks)

Additional information regarding the different NSR authorizations can be found at the link below:
<https://www.tceq.texas.gov/permitting/air/guidance/authorize.html>

Select from the drop-down the type of action being requested for each permit type. **If that permit type does not apply, you MUST select "Not applicable".**

Provide all assigned permit numbers relevant for the project. Leave blank if the permit number has not yet been assigned.

Permit Type	Action Type Requested (do not leave blank)	Permit Number (if assigned)
Minor NSR (can be a Title V major source): <i>Not applicable, Initial, Amendment, Renewal, Renewal Certification, Renewal/Amendment, Relocation/Alteration, Change of Location, Alteration, Extension to Start of Construction</i>	Initial	
Special Permit: <i>Not applicable, Amendment, Renewal, Renewal Certification, Renewal/Amendment, Alteration, Extension to Start of Construction</i>	Not applicable	
De Minimis: <i>Not applicable, Initial</i>	Not applicable	
Flexible: <i>Not applicable, Initial, Amendment, Renewal, Renewal Certification, Renewal/Amendment, Alteration, Extension to Start of Construction</i>	Not applicable	
PSD: <i>Not applicable, Initial, Major Modification</i>	Not applicable	
Nonattainment: <i>Not applicable, Initial, Major Modification</i>	Not applicable	
HAP Major Source [FCAA § 112(g)]: <i>Not applicable, Initial, Major Modification</i>	Not applicable	
PAL: <i>Not applicable, Initial, Amendment, Renewal, Renewal/Amendment, Alteration</i>	Not applicable	
GHG PSD: <i>Not applicable, Initial, Major Modification, Voluntary Update</i>	Not applicable	

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General

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 Exflur Research Corporation

B. MSS Activities	
How are/will MSS activities for sources associated with this project be authorized?	Permit by Rule
List the permit number, registration number, and/or PBR number.	PBR number 106.263

C. Consolidating NSR Permits	
Will this permit be consolidated into another NSR permit with this action?	No
Will NSR permits be consolidated into this permit with this action?	No

D. Incorporation of Standard Permits, Standard Exemptions, and/or Permits By Rule (PBR)

To ensure protectiveness, previously issued authorizations (standard permits, standard exemptions, or PBRs) including those for MSS, are incorporated into a permit either by consolidation or by reference.

- Authorizations entirely incorporated by consolidation will be voided when the project is complete, and the sources and allowable emissions will be added to the NSR permit's MAERT.
- Authorizations incorporated by reference will be referenced with the final action for this project but will not be voided. Sources will continue to be authorized in the current manner.

At the time of renewal and/or amendment, consolidation (in some cases) may be voluntary and referencing is mandatory. More guidance regarding incorporation can be found in 30 TAC § 116.116(d)(2), 30 TAC § 116.615(3) and in this memo (link below):

https://www.tceq.texas.gov/assets/public/permitting/air/memos/pbr_spc06.pdf

Are there any standard permits, standard exemptions, or PBRs to be incorporated by reference?	No
Are there any PBR, standard exemptions, or standard permits associated to be incorporated by consolidation? Note: Emission calculations, a BACT analysis, and an impacts analysis must be attached to this application at the time of submittal for any authorization to be incorporated by consolidation.	No

E. Associated Federal Operating Permits	
Is this facility located at a site required to obtain a site operating permit (SOP) or general operating permit (GOP) ?	No

IV. Facility Location and General Information

A. Location	
County: Enter the county where the facility is physically located.	Williamson
TCEQ Region	Region 11
County attainment status as of Sept. 23, 2019	attainment or unclassified for all pollutants
Street Address:	1100 CR 236
City: If the address is not located in a city, then enter the city or town closest to the facility, even if it is not in the same county as the facility.	Florence

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ZIP Code: Include the ZIP Code of the physical facility site, not the ZIP Code of the applicant's mailing address.	76527
Site Location Description: If there is no street address, provide written driving directions to the site. Identify the location by distance and direction from well-known landmarks such as major highway intersections.	
Use USGS maps, county maps prepared by the Texas Department of Transportation, or an online software application such as Google Earth to find the latitude and longitude.	
Latitude (in degrees, minutes, and nearest second (DDD:MM:SS)) for the street address or the destination point of the driving directions. Latitude is the angular distance of a location north of the equator and will always be between 25 and 37 degrees north (N) in Texas.	30° 47' 28.3"
Longitude (in degrees, minutes, and nearest second (DDD:MM:SS)) for the street address or the destination point of the driving directions. Longitude is the angular distance of a location west of the prime meridian and will always be between 93 and 107 degrees west (W) in Texas.	97° 54' 11.52"
Is this a project for a lead smelter, concrete crushing facility, and/or a hazardous waste management facility?	No
B. General Information	
Site Name:	Florence Site
Area Name: Must indicate the general type of operation, process, equipment or facility. Include numerical designations, if appropriate. Examples are Sulfuric Acid Plant and No. 5 Steam Boiler. Vague names such as Chemical Plant are not acceptable.	Specialty Chemicals Manufacturing
Are there any schools located within 3,000 feet of the site boundary?	No
C. Portable Facility	
Permanent or portable facility?	Permanent
D. Industry Type	
Principal Company Product/Business:	Specialty Chemicals Manufacturing
A list of SIC codes can be found at the link below: https://www.naics.com/sic-codes-industry-drilldown/	
Principal SIC code:	2869
NAICS codes and conversions between NAICS and SIC Codes are available at the link below: https://www.census.gov/eos/www/naics/	
Principal NAICS code:	325998
E. State Senator and Representative for this site	
This information can be found at the link below (note, the website is not compatible to Internet Explorer): https://wrm.capitol.texas.gov/	
State Senator:	Charles Schwertner
District:	Texas Senate District 5
State Representative:	Terry M. Wilson
District:	Texas House District 20

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 Exflur Research Corporation

V. Project Information	
A. Description	
Provide a brief description of the project that is requested (describe the what, not the how and why). Limited to 500 characters.	Exflur Research Corporation (Exflur) is submitting this permit application to obtain authorization to build a new specialty chemicals manufacturing facility. The new facility will be located near Florence in Williamson County, Texas. Exflur will use the facility to produce a variety of perfluorocarbons.
B. Project Timing	
Authorization must be obtained for many projects before beginning construction. Construction is broadly interpreted as anything other than site clearance or site preparation. Enter the date as "Month Date, Year" (e.g. July 4, 1776).	
Projected Start of Construction:	November 1, 2021
Projected Start of Operation:	December 1, 2021
C. Enforcement Projects	
Is this application in response to, or related to, an agency investigation, notice of violation, or enforcement action?	No
D. Operating Schedule	
Will sources in this project be authorized to operate 8760 hours per year?	Yes

VI. Application Materials	
All representations regarding construction plans and operation procedures contained in the permit application shall be conditions upon which the permit is issued. (30 TAC § 116.116)	
A. Confidential Application Materials	
Is confidential information submitted with this application?	Yes
<i>If yes, is each confidential page marked "CONFIDENTIAL" in large red letters?</i>	Yes
THSC §382.041 requires us not to disclose any information related to manufacturing processes that is marked Confidential. Mark any information related to secret or proprietary processes or methods of manufacture Confidential if you do not want this information in the public file. All confidential information should be separated from the application and submitted as a separate file. Additional information regarding confidential information can be found at the link below: https://www.tceq.texas.gov/permitting/air/confidential.html	
B. Is the Core Data Form (Form 10400) attached (link to the form below)?	N/A
C. Is a current area map attached?	Yes
Is the area map a current map with a true north arrow, an accurate graduated scale, the entire plant property, the location of the property relative to prominent geographical features including, but not limited to, highways, roads, streams, and significant landmarks such as buildings, residences, schools, parks, hospitals, day care centers, and churches?	Yes
Does the map show a 3,000-foot radius from the property boundary?	Yes
D. Is a plot plan attached?	Yes
Does your plot plan clearly show a north arrow, an accurate scale, all property lines, all emission points, buildings, tanks, process vessels, other process equipment, and two bench mark locations?	Yes
Does your plot plan identify all emission points on the affected property, including all emission points authorized by other air authorizations, construction permits, PBRs, special permits, and standard permits?	Yes
Did you include a table of emission points indicating the authorization type and authorization identifier, such as a permit number, registration number, or rule citation under which each emission point is currently authorized?	Yes
E. Is a process flow diagram attached?	Yes

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Is the process flow diagram sufficiently descriptive so the permit reviewer can determine the raw materials to be used in the process; all major processing steps and major equipment items; individual emission points associated with each process step; the location and identification of all emission abatement devices; and the location and identification of all waste streams (including wastewater streams that may have associated air emissions)?	Yes
F. Is a process description attached?	Yes
Does the process description emphasize where the emissions are generated, why the emissions must be generated, what air pollution controls are used (including process design features that minimize emissions), and where the emissions enter the atmosphere?	Yes
Does the process description also explain how the facility or facilities will be operating when the maximum possible emissions are produced?	Yes
G. Is a detailed list of requested actions included in the application? This list can be included in the project description.	Yes
H. Are detailed calculations attached? Calculations must be provided for each source with new or changing emission rates. For example, a new source, changing emission factors, decreasing emissions, consolidated sources, etc. Calculations do not need to be submitted for sources without any proposed emission rate changes. Note: the preferred format is an electronic workbook (such as Excel) with all formulas viewable for review.	Yes
Are emission rates and associated calculations for planned MSS facilities and related activities attached?	N/A
I. Is a material balance (Table 2, Form 10155) attached?	Yes
Table 2 (Form 10155), entitled Material Balance: A material balance representation may be required for all applications to confirm technical emissions information. Typically this is required for refining and chemical manufacturing processes involving reactions, separations, and blending. It may also be requested by the permit reviewer for other applications. Table 2 should represent the total material balance; that is, all streams into the system and all streams out. Additional sheets may be attached if necessary. Complex material balances may be presented on spreadsheets or indicated using process flow diagrams. All materials in the process should be addressed whether or not they directly result in the emission of an air contaminant. All production rates must be based on maximum operating conditions.	
J. Is a list of MSS activities attached?	N/A
K. Is a discussion of state regulatory requirements attached, addressing 30 TAC Chapters 101, 111, 112, 113, 115, and 117?	Yes
For all applicable chapters, does the discussion include how the facility will comply with the requirements of the chapter?	Yes
For all not applicable chapters, does the discussion include why the chapter is not applicable?	Yes
L. Are all other required tables, calculations, and descriptions attached?	Yes

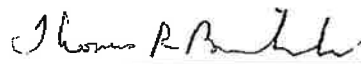
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VII. Signature

The owner or operator of the facility must apply for authority to construct. The appropriate company official (owner, plant manager, president, vice president, or environmental director) must sign all copies of the application. The applicant's consultant cannot sign the application. **Important Note: Unless submitting through STEERS, signatures must be original in ink, not reproduced by photocopy, fax, or other means, and must be received before any permit is issued.**

The signature below confirms that I have knowledge of the facts included in this application and that these facts are true and correct to the best of my knowledge and belief. I further state that to the best of my knowledge and belief, the project for which application is made will not in any way violate any provision of the Texas Water Code (TWC), Chapter 7; the Texas Health and Safety Code, Chapter 382; the Texas Clean Air Act (TCAA); the air quality rules of the Texas Commission on Environmental Quality; or any local governmental ordinance or resolution enacted pursuant to the TCAA. I further state that I understand my signature indicates that this application meets all applicable nonattainment, prevention of significant deterioration, or major source of hazardous air pollutant permitting requirements. The signature further signifies awareness that intentionally or knowingly making or causing to be made false material statements or representations in the application is a criminal offense subject to criminal penalties.

Name:	Thomas Bierschenk
Signature:	
<i>Original signature is required unless submitted through STEERS.</i>	
Date:	7/9/21

Texas Commission on Environmental Quality
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Technical

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E. Concrete Batch Plants	
Is this a project for a concrete batch plant?	No
VIII. Federal Regulatory Questions	
Indicate if any of the following requirements apply to the proposed facility. Note that some federal regulations apply to minor sources. Enter all applicable Subparts.	
A. Title 40 CFR Part 60	
Do NSPS subpart(s) apply to a facility in this application?	No
B. Title 40 CFR Part 61	
Do NESHAP subpart(s) apply to a facility in this application?	No
C. Title 40 CFR Part 63	
Do MACT subpart(s) apply to a facility in this application?	No
IX. Emissions Review	
A. Impacts Analysis	
Any change that may result in an increase in off-property concentrations of air contaminants requires an air quality impacts demonstration, which may include a qualitative analysis, the MERA, and/or modeling. Information regarding the air quality impacts demonstration must be provided with the application and show compliance with all state and federal requirements. Detailed requirements for the information necessary to make the demonstration are listed on the Impacts sheet.	
Are there any increases in short-term and/or long-term allowable emission rates?	Yes
Can all the emission rate increases be attributed to speciation of currently authorized PM emissions and/or revisions of AP-42 or TCEQ guidance?	No
Are there any new or modified control devices or emission sources?	Yes
Are there any changes to emission point discharge parameters? Consider all parameters on the Stack Parameters sheet, including location.	No
Will any PBR registrations, standard permit, or standard exemptions be incorporated by consolidation?	No
Does this project require an impacts analysis?	Yes
B. Disaster Review	
If the proposed facility will handle sufficient quantities of certain chemicals which, if released accidentally, would cause off-property impacts that could be immediately dangerous to life and health, a disaster review analysis may be required as part of the application. Contact the appropriate NSR permitting section for assistance at (512) 239-1250. Additional Guidance can be found at the link below: https://www.tceq.texas.gov/assets/public/permitting/air/Guidance/NewSourceReview/disrev-factsheet.pdf	
Does this application involve any air contaminants for which a disaster review is required?	Yes
If Yes, list which air contaminants require a disaster review.	Hydrogen fluoride

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C. Air Pollutant Watch List	
<p>Certain areas of the state have concentrations of specific pollutants that are of concern. The TCEQ has designated these portions of the state as watch list areas. Location of a facility in a watch list area could result in additional restrictions on emissions of the affected air pollutant(s) or additional permit requirements. The location of the areas and pollutants of interest can be found at the link below:</p> <p>https://www.tceq.texas.gov/toxicology/apwl/apwl.html</p>	
Is the proposed facility located in a watch list area?	No
D. Mass Emissions Cap and Trade	
<p>Is this facility located at a site within the Houston/Galveston nonattainment area (Brazoria, Chambers, Fort Bend, Galveston, Harris, Liberty, Montgomery, and Waller Counties)?</p>	
	No
X. Additional Requirements	
A. Bulk Fuel Terminals	
Is this project for a bulk fuel terminal?	No
B. Plant Fuel Gas Facilities	
Does this site utilize plant fuel gas?	No

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 Unit Types - Emission Rates

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Permit primary industry (must be selected for workbook to function)														
Chemical / Energy														
Action Requested (only 1 action per FIN)	Include these emissions in annual (tpy) summary?	Facility ID Number (FIN)	Emission Point Number (EPN)	Source Name	Pollutant	Current Short-Term (lb/hr)	Current Long-Term (tpy)	Consolidated Current Short-Term (lb/hr)	Consolidated Current Long-Term (tpy)	Proposed Short-Term (lb/hr)	Proposed Long-Term (tpy)	Short-Term Difference (lb/hr)	Long-Term Difference (tpy)	Unit Type (used for reviewing BACT and Monitoring Requirements)
New/Modified	Yes	EP3-1	EP3-1	Exhaust Gas Vent System	VOC					0.155	0.14	0.155	0.14	Process Vent
					HCl					<0.01	0.03	0.01	0.03	
					F2					<0.01	<0.01	0.01	0.01	
					HCl					<0.01	<0.01	0.01	0.01	
					HCl					0.023	0.09	0.023	0.09	
					HCl					<0.01	<0.01	0.01	0.01	
					NOx					0.05	0.2	0.05	0.2	
					CO					0.06	0.27	0.06	0.27	
					Carbon Compounds excluding VOC & CO					1.053	4.404	1.053	4.404	
New/Modified	Yes	EP3-2	EP3-2	Washing Reactor 1	VOC					0.733	0.2	0.733	0.2	Process Vent
New/Modified	Yes	EP3-3	EP3-3	Washing Reactor 2	VOC					0.984	0.27	0.984	0.27	Process Vent
New/Modified	Yes	EP3-4	EP3-4	Water Reservoir	VOC					<0.01	0.02	0.01	0.02	Process Vent
New/Modified	Yes	EP3-5	EP3-5	Evaporation Pond	VOC					0.01	0.05	0.01	0.05	Manufacturing Facilities
New/Modified	Yes	FUG3-1	FUG3-1	Building 3 Fugitives	VOC					0.13	0.56	0.13	0.56	Fugitives: Piping and Equipment Leak
					F2					0.103	0.453	0.103	0.453	
					B2					0.14	0.6	0.14	0.6	
					Carbon Compounds excluding VOC & CO					1.65	7.21	1.65	7.21	
					HCl					0.06	0.255	0.06	0.255	
New/Modified	Yes	FUG3-2	FUG3-2	Reduction Reactor 1 Fugitives	VOC					0.03	0.13	0.03	0.13	Fugitives: Piping and Equipment Leak
					HCl					0.0075	0.033	0.0075	0.033	
New/Modified	Yes	FUG3-3	FUG3-3	Reduction Reactor 2 Fugitives	VOC					0.03	0.13	0.03	0.13	Fugitives: Piping and Equipment Leak
					HCl					0.0036	0.016	0.0036	0.016	
					Carbon Compounds excluding VOC & CO					0.06	0.26	0.06	0.26	
New/Modified	Yes	FUG3-4	FUG3-4	Reduction Reactor 3 Fugitives	VOC					0.06	0.25	0.06	0.25	Fugitives: Piping and Equipment Leak
					HCl					0.0031	0.014	0.0031	0.014	
					Carbon Compounds excluding VOC & CO					0.085	0.415	0.085	0.415	
New/Modified	Yes	FUG3-5	FUG3-5	Solvent Strip Column 3 Fugitives	VOC					<0.01	<0.01	0.01	0.01	Fugitives: Piping and Equipment Leak
					Carbon Compounds excluding VOC & CO					0.085	0.037	0.085	0.037	
										0	0	0	0	
										0	0	0	0	

Emission Point Discharge Parameters												
EPN	Included in EMEW?	UTM Coordinates Zone	East (Meters)	North (Meters)	Building Height (ft)	Height Above Ground (ft)	Stack Exit Diameter (ft)	Velocity (FPS)	Temperature (°F)	Fugitives - Length (ft)	Fugitives - Width (ft)	Fugitives - Axis Degrees
EP3-1	Yes											
EP3-2	Yes											
EP3-3	Yes											
EP3-4	Yes											
EP3-5	Yes											
FUG3-1	Yes											
FUG3-2	Yes											
FUG3-3	Yes											
FUG3-4	Yes											
FUG3-5	Yes											

I. Public Notice Applicability					
A. Application Type					
Is this an application for an initial permit?					Yes
B. Project Increases and Public Notice Thresholds (for Initial and Amendment Projects)					
Pollutant			Proposed Long-Term (tpy)		
VOC			8.87		
PM			0.00		
PM ₁₀			0.00		
PM _{2.5}			0.00		
NO _x			0.20		
CO			0.27		
SO ₂			0.00		
Pb			0.00		
HF			0.59		
F2			0.463		
Br2			0.61		
HCl			0.153		
HBr			0.01		
Carbon Compounds e			12.326		
H2			0.255		
* Notice is required for PM, PM10, and PM2.5 if one of these pollutants is above the threshold.					
** Notice of a GHG action is determined by action type. Initial and major modification always require notice. Voluntary updates require a consolidated notice if there is a change to BACT. Project emission increases of CO2e (CO2 equivalent) are not relevant for determining public notice of GHG permit actions.					
D. Is public notice required for this project as represented in this PI-1?					Yes
If no, proceed to Section III Small Business Classification. Note: public notice applicability for this project may change throughout the technical review.					
E. Are any HAPs to be authorized/re-authorized with this project? The category "HAPs" must be specifically listed in the public notice if the project authorizes (reauthorizes for renewals) any HAP pollutants.					Yes

II. Public Notice Information	
Complete this section if public notice is required (determined in the above section) or if you are not sure if public notice is required.	
A. Contact Information	
Enter the contact information for the person responsible for publishing . This is a designated representative who is responsible for ensuring public notice is properly published in the appropriate newspaper and signs are posted at the facility site. This person will be contacted directly when the TCEQ is ready to authorize public notice for the application.	
Prefix (Mr., Ms., Dr., etc.):	Mr.
First Name:	Luke
Last Name:	Bernhard
Title:	EHS Manager
Company Name:	Exflur Research Corporation
Mailing Address:	2350 Double Creek Dr.
Address Line 2:	
City:	Round Rock
State:	Texas
ZIP Code:	78664
Telephone Number:	512.310.9044
Fax Number:	512.310.9045
Email Address:	luke.bernhard@exflur.com
Enter the contact information for the Technical Contact . This is the designated representative who will be listed in the public notice as a contact for additional information.	
Prefix (Mr., Ms., Dr., etc.):	Mr.
First Name:	Thomas
Last Name:	Bierschenk
Title:	Vice President
Company Name:	Exflur Research Corporation
Mailing Address:	2350 Double Creek Dr.
Address Line 2:	
City:	Round Rock
State:	Texas
ZIP Code:	78664
Telephone Number:	512.310.9044
Fax Number:	512.310.9045
Email Address:	bierschenk_t@exflur.com

B. Public place

Place a copy of the full application (including the entire completed PI-1 and all attachments) at a public place in the county where the facilities are or will be located. You must state where in the county the application will be available for public review and comment. The location must be a public place and described in the notice. A public place is a location which is owned and operated by public funds (such as libraries, county courthouses, city halls) and cannot be a commercial enterprise. You are required to pre-arrange this availability with the public place indicated below. The application must remain available from the first day of publication through the designated comment period.

If this is an application for a PSD, nonattainment, or FCAA §112(g) permit, the public place must have internet access available for the public as required in 30 TAC § 39.411(f)(3).

If the application is submitted to the agency with information marked as Confidential, you are required to indicate which specific portions of the application are not being made available to the public. These portions of the application must be accompanied with the following statement: **Any request for portions of this application that are marked as confidential must be submitted in writing, pursuant to the Public Information Act, to the TCEQ Public Information Coordinator, MC 197, P.O. Box 13087, Austin, Texas 78711-3087.**

Name of Public Place:	Eula Hunt Beck Florence Public Library
Physical Address:	206 East Main Street
Address Line 2:	
City:	Florence
ZIP Code:	76527
County:	Williamson
Has the public place granted authorization to place the application for public viewing and copying?	Yes

C. Alternate Language Publication

In some cases, public notice in an alternate language is required. If an elementary or middle school nearest to the facility is in a school district required by the Texas Education Code to have a bilingual program, a bilingual notice will be required. If there is no bilingual program required in the school nearest the facility, but children who would normally attend those schools are eligible to attend bilingual programs elsewhere in the school district, the bilingual notice will also be required. If it is determined that alternate language notice is required, you are responsible for ensuring that the publication in the alternate language is complete and accurate in that language.

Is a bilingual program required by the Texas Education Code in the School District?	Yes
Are the children who attend either the elementary school or the middle school closest to your facility eligible to be enrolled in a bilingual program provided by the district?	Yes
If yes to either question above, list which language(s) are required by the bilingual program. Enter the second required language, if applicable. Enter the third required language, if applicable. Enter the fourth required language, if applicable.	Spanish

III. Small Business Classification

Complete this section to determine small business classification. If a small business requests a permit, agency rules (30 TAC § 39.603(f)(1)(A)) allow for alternative public notification requirements if all of the following criteria are met. If these requirements are met, public notice does not have to include publication of the prominent (12 square inch) newspaper notice.

Does the company (including parent companies and subsidiary companies) have fewer than 100 employees or less than \$6 million in annual gross receipts?	Yes
Is the site a major source under 30 TAC Chapter 122, Federal Operating Permit Program?	No
Are the site emissions of any individual air contaminant greater than or equal to 50 tpy?	No
Are the site emissions of all air contaminants combined greater than or equal to 75 tpy?	No
Small business classification:	Yes

I. County Classification	
Does the project require retrospective review?	No
County (completed for you from your response on the General sheet)	Williamson
This project will be located in an area that is in attainment for ozone as of Sept. 23, 2019. Select from the drop-down list to the right if you would like the project to be reviewed under a different classification.	
Determination:	This project will be located in an area that is in attainment or unclassified for all pollutants. Nonattainment review is not required.

II. PSD and GHG PSD Applicability Summary			
Is netting required for the PSD analysis for this project?			No
Pollutant	Project Increase	Threshold	PSD Review Required?
CO	0.27	100	No
NO _x	0.2	100	No
PM			
PM ₁₀			
PM _{2.5}			
SO ₂			
Ozone (as VOC)	8.85	100	No
Ozone (as NO _x)	0.2	100	No
Pb			
H ₂ S			
TRS			
Reduced sulfur compounds (including H ₂ S)			
H ₂ SO ₄			
Fluoride (excluding HF)	20.19	100	No
CO ₂ e			

Texas Commission on Environmental Quality
Form PI-1 General Application
Fees

July 2021
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Exflur Research Corporation

I. Expedited Permitting Request	
Are you requesting to expedite this project?	No

II. General Information - Non-Renewal	
Is this project for new facilities controlled and operated directly by the federal government? (30 TAC § 116.141(b)(1) and 30 TAC § 116.163(a))	No
A fee of \$75,000 shall be required if no estimate of capital project cost is included with the permit application. (30 TAC § 116.141(d)) Select "yes" here to use this option.	No
Select Application Type	Minor Application

III. Direct Costs - Non-Renewal	
Type of Cost	Amount
Process and control equipment not previously owned by the applicant and not currently authorized under this chapter.	\$200,000.00
Auxiliary equipment, including exhaust hoods, ducting, fans, pumps, piping, conveyors, stacks, storage tanks, waste disposal facilities, and air pollution control equipment specifically needed to meet permit and regulation requirements.	\$200,000.00
Freight charges.	\$12,000.00
Site preparation, including demolition, construction of fences, outdoor lighting, road, and parking areas.	\$50,000.00
Installation, including foundations, erection of supporting structures, enclosures or weather protection, insulation and painting, utilities and connections, process integration, and process control equipment.	\$50,000.00
Auxiliary buildings, including materials storage, employee facilities, and changes to existing structures.	\$1,500,000.00
Ambient air monitoring network.	\$10,000.00
Sub-Total:	\$2,022,000.00

IV. Indirect Costs - Non-Renewal	
Type of Cost	Amount
Final engineering design and supervision, and administrative overhead.	\$100,000.00
Construction expense, including construction liaison, securing local building permits, insurance, temporary construction facilities, and construction clean-up.	\$40,000.00
Contractor's fee and overhead.	\$50,000.00
Sub-Total:	\$190,000.00

V. Calculations - Non-Renewal

For GHG permits: A single PSD fee (calculated on the capital cost of the project per 30 TAC § 116.163) will be required for all of the associated permitting actions for a GHG PSD project. Other NSR permit fees related to the project that have already been remitted to the TCEQ can be subtracted when determining the appropriate fee to submit with the GHG PSD application. Identify these other fees in the GHG PSD permit application.

In signing the "General" sheet with this fee worksheet attached, I certify that the total estimated capital cost of the project as defined in 30 TAC §116.141 is equal to or less than the above figure. I further state that I have read and understand Texas Water Code § 7.179, which defines Criminal Offenses for certain violations, including intentionally or knowingly making, or causing to be made, false material statements or representations.

Estimated Capital Cost	Minor Application Fee
Less than \$300,000	\$900 (minimum fee)
\$300,000 - \$7,500,000	N/A
\$300,000 - \$25,000,000	0.30% of capital cost
Greater than \$7,500,000	N/A
Greater than \$25,000,000	\$75,000 (maximum fee)

Your estimated capital cost:	\$2,212,000.00	x 0.30% =	
Permit Application Fee:			\$6,636.00

VII. Total Permit Fees

Note: fees can be paid together with one payment or as two separate payments.

Non-Renewal Fee	\$6,636.00
Total	\$6,636.00

VIII. Payment Information

A. Payment One (required)

Was the fee paid online?	No
Enter the fee amount:	\$ 6,636.00
Enter the check, money order, ePay Voucher, or other transaction number (enter "STEERS" if submitting and paying through STEERS):	
Enter the Company name as it appears on the check:	
C. Total Paid	\$6,636.00

IX. Professional Engineer Seal Requirement

Is the estimated capital cost of the project above \$2 million?	Yes
Is this project subject to an exemption contained in the Texas Engineering Practice Act (TEPA)? (30 TAC § 116.110(f))	No
Is the application required to be submitted under the seal of a Texas licensed P.E.? Note: an electronic PE seal is acceptable.	Yes

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Impacts

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Pollutant	Does this pollutant require PSD review?	How will you demonstrate that this project meets all applicable requirements?	Notes
VOC	No	MERA steps 0-2 AND Modeling (screen or refined)	Attach both an "Electronic Modeling Evaluation Workbook" (EMEW) AND a detailed description of which MERA step was met. Include speciated emission rates with the total VOC and/or PM species corresponding to the short-term and long-term differences represented on the Unit Types-Emission Rates sheet.
HF	No	MERA steps 0-2 AND Modeling (screen or refined)	Attach both an "Electronic Modeling Evaluation Workbook" (EMEW) AND a detailed description of which MERA step was met. Include speciated emission rates with the total VOC and/or PM species corresponding to the short-term and long-term differences represented on the Unit Types-Emission Rates sheet.
F2	No	MERA steps 0-2 AND Modeling (screen or refined)	Attach both an "Electronic Modeling Evaluation Workbook" (EMEW) AND a detailed description of which MERA step was met. Include speciated emission rates with the total VOC and/or PM species corresponding to the short-term and long-term differences represented on the Unit Types-Emission Rates sheet.
Br2	No	MERA steps 0-2 AND Modeling (screen or refined)	Attach both an "Electronic Modeling Evaluation Workbook" (EMEW) AND a detailed description of which MERA step was met. Include speciated emission rates with the total VOC and/or PM species corresponding to the short-term and long-term differences represented on the Unit Types-Emission Rates sheet.
HCl	No	MERA steps 0-2 AND Modeling (screen or refined)	Attach both an "Electronic Modeling Evaluation Workbook" (EMEW) AND a detailed description of which MERA step was met. Include speciated emission rates with the total VOC and/or PM species corresponding to the short-term and long-term differences represented on the Unit Types-Emission Rates sheet.
HBr	No	MERA steps 0-2 AND Modeling (screen or refined)	Attach both an "Electronic Modeling Evaluation Workbook" (EMEW) AND a detailed description of which MERA step was met. Include speciated emission rates with the total VOC and/or PM species corresponding to the short-term and long-term differences represented on the Unit Types-Emission Rates sheet.
NOx	No	Modeling: screen or refined	Attach a completed "Electronic Modeling Evaluation Workbook" (EMEW).
CO	No	Modeling: screen or refined	Attach a completed "Electronic Modeling Evaluation Workbook" (EMEW).
Carbon Compounds excluding VOC & CO	No	MERA steps 0-2 AND Modeling (screen or refined)	Attach both an "Electronic Modeling Evaluation Workbook" (EMEW) AND a detailed description of which MERA step was met. Include speciated emission rates with the total VOC and/or PM species corresponding to the short-term and long-term differences represented on the Unit Types-Emission Rates sheet.
H2	No	MERA steps 0-2 AND Modeling (screen or refined)	Attach both an "Electronic Modeling Evaluation Workbook" (EMEW) AND a detailed description of which MERA step was met. Include speciated emission rates with the total VOC and/or PM species corresponding to the short-term and long-term differences represented on the Unit Types-Emission Rates sheet.

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Form PI-1 General Application
BACT**

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Exfluor Research Corporation

Action Requested	FINs	Unit Type	Pollutant	Current Tier I BACT	Confirm	Additional Notes
New/Modified	EP3-1	Process Vent	VOC	Non-halogenated VOCs: flare, any oxidizer, adsorber, absorber/scrubber, etc. Specify technique. Must meet that control device's approved efficiency. Halogenated VOC: Thermal oxidation followed by absorber/scrubber carbon adsorption. Specify technique. Must meet that control device's approved efficiency.	Yes	The halogenated and non-halogenated VOC emissions are controlled by thermal oxidizers followed by scrubbers. The overall control efficiency of each system is 99.9%. The HF emissions are controlled by scrubbers. The control efficiency is at least 99.9% which is BACT. The F2 emissions are controlled by thermal oxidizers followed by scrubbers. The overall control efficiency is at least 99.9% which is BACT.
			HF	See additional notes:		
			F2	See additional notes:		
			Br2	See Additional Notes:		The Br2 emissions are controlled by thermal oxidizers followed by scrubbers. The overall control efficiency is at least 99.9% which is BACT.
			HCl	See additional notes:		The HCl emissions are controlled by scrubbers. The overall control efficiency is at least 99.9% which is BACT.
			HBr	See Additional Notes:		The HBr emissions are controlled by scrubbers. The overall control efficiency is at least 99.9% which is BACT.
			NOX	See Additional Notes:		The NOx emissions are controlled using burners that meet the Tier I BACT NOx emission factor requirement. NOx emissions are less than 0.2 ton/yr. Therefore, the cost of any additional control would not be economically reasonable.
			CO	See additional notes:		The CO emissions are controlled by operating at sufficiently high temperature to produce low CO emission rates. The CO emission rate is less than 0.3 ton/year. Therefore, the cost of any additional controls to reduce CO emissions would not be economically reasonable.
			Carbon Compounds excluding VOC & CO	See additional notes:		The emissions of halogenated and non-halogenated carbon compounds that are not VOC or CO are controlled by thermal oxidizers followed by scrubbers. The overall control efficiency of each system is 99.9% which is BACT.
			MSS	Same as normal operation BACT requirements.		MSS emissions are not authorized in this permit.
				Non-halogenated VOCs: flare, any oxidizer, adsorber, absorber/scrubber, etc. Specify technique. Must meet that control device's approved efficiency. Halogenated VOC: Thermal oxidation followed by absorber/scrubber carbon adsorption. Specify technique. Must meet that control device's approved efficiency.	No	The halogenated and non-halogenated VOC emissions from the source are less than 0.2 tpy. No further control is proposed because there are no control devices that could be installed on this vent that would meet the BACT requirement for being economically reasonable.
New/Modified	EP3-2	Process Vent	VOC	Same as normal operation BACT requirements.		MSS emissions are not authorized in this permit.
			MSS	Non-halogenated VOCs: flare, any oxidizer, adsorber, absorber/scrubber, etc. Specify technique. Must meet that control device's approved efficiency. Halogenated VOC: Thermal oxidation followed by absorber/scrubber carbon adsorption. Specify technique. Must meet that control device's approved efficiency.	No	The halogenated and non-halogenated VOC emissions from the source are less than 0.3 tpy. No further control is proposed because there are no control devices that could be installed on this vent that would meet the BACT requirement for being economically reasonable.
New/Modified	EP3-3	Process Vent	VOC	Same as normal operation BACT requirements.		MSS emissions are not authorized in this permit.
			MSS	Non-halogenated VOCs: flare, any oxidizer, adsorber, absorber/scrubber, etc. Specify technique. Must meet that control device's approved efficiency. Halogenated VOC: Thermal oxidation followed by absorber/scrubber carbon adsorption. Specify technique. Must meet that control device's approved efficiency.	No	The non-halogenated VOC emissions from the source are less than 0.3 tpy. No further control is proposed because there are no control devices that could be installed on this vent that would meet the BACT requirement for being economically reasonable.
New/Modified	EP3-4	Process Vent	VOC	Same as normal operation BACT requirements.		MSS emissions are not authorized in this permit.
			MSS	Non-halogenated VOCs: flare, any oxidizer, adsorber, absorber/scrubber, etc. Specify technique. Must meet that control device's approved efficiency. Halogenated VOC: Thermal oxidation followed by absorber/scrubber carbon adsorption. Specify technique. Must meet that control device's approved efficiency.	No	The non-halogenated VOC emissions from the source are less than 0.3 tpy. No further control is proposed because there are no control devices that could be installed on this vent that would meet the BACT requirement for being economically reasonable.

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Action Requested	FINS	Unit Type	Pollutant	Current Tier / BACT	Confirm	Additional Notes
New/Modified	EP3-5	Wastewater Facilities	VOC	<p>Applicable for organics and inorganics.</p> <p>Uncontrolled site-wide wastewater emissions < 5 tpy VOC; Piped and covered conveyance to storage or biological treatment.</p> <p>Uncontrolled site-wide wastewater emissions > 5 tpy VOC; stripped gases from pretreatment routed to a control device, collection system hard piped/covered conveyance to biological treatment unit vented to a control device, wastewater treatment system must be at least 90 percent efficient.</p>	Yes	Stripped gases from Solvent Strip Column 3 are routed to a Thermal Oxidizer for destruction of VOC. Solvent Strip Column 3 removes 99% of the VOC from the wastewater and the Thermal Oxidizer destroys 99.9% of the VOC vented from the solvent strip column. Emissions from EPN EP3-5 are less than 0.05 ton/year. Therefore, additional control measures would not be economically reasonable.
			MSS	<p>Same as normal operation BACT requirements.</p> <p>Specify which is applicable:</p> <ol style="list-style-type: none"> 1. Uncontrolled VOC emissions < 10 tpy: none 2. 10 tpy < uncontrolled VOC emissions < 25 tpy: 28M leak detection and repair program. 75% credit for 28M. 3. Uncontrolled VOC emissions > 25 tpy: 28VHP leak detection and repair program. 97% credit for valves, 85% for pumps and compressors. 4. VOC vp < 0.002 psia: no inspection required, no fugitive emissions expected. <p>For emissions of approved odorous compounds (chlorine, ammonia, hydrogen sulfide, hydrogen cyanide and mercaptans only): AVO inspection twice per shift. Appropriate credit for AVO program.</p>	Yes	<p>MSS emissions are not authorized in this permit.</p> <p>1. Uncontrolled VOC emissions < 10 tpy. Leaks from some streams that contain VOC also contain HF. TCEQ's APDG 6422 indicates the 28AVO program applies to HF. The 28AVO program will be used to monitor fugitive components on those streams and that monitoring will result in detection of some VOC leaks. AVO inspections will be done three times per day on weekdays when the site is typically staffed and once each morning on other days such as weekends and holidays.</p>
New/Modified	FUG3-1	Fugitives: Piping and Equipment Leak	VOC	<p>See additional notes:</p>	Yes	TCEQ's APDG 6422 indicates the 28AVO program applies to HF. The 28AVO program will be used to monitor fugitive components where HF would be present in the leaked material. AVO inspections will be done three times per day on weekdays when the site is typically staffed and once each morning on other days such as weekends and holidays.
			HF	<p>See additional notes:</p>		Streams that contain F2 also contain HF. Exflur will use the 28AVO program to monitor the fugitive components that would have HF in the leaked material. As a result, the components on streams that contain F2 will be monitored using the 28 AVO program. AVO inspections will be done three times per day on weekdays when the site is typically staffed and once each morning on other days such as weekends and holidays.
			F2	<p>See additional notes:</p>		Bromine (Br2) has published odor thresholds in a range that is very low, lower than HF in some cases. Additionally, Br2 is used in the same building where HF is used. Therefore, Exflur expects any Br2 leaks to be detected during weekly walk-throughs of the building. Uncontrolled Br2 fugitive emissions are less than 0.6 tpy.
			Br2	<p>See additional notes:</p>		Leaks from some streams that contain carbon compounds other than VOC and CO would also contain HF. Exflur will use the 28AVO program to monitor those fugitive components. AVO inspections will be done three times per day on weekdays when the site is typically staffed and once each morning on other days such as weekends and holidays. Uncontrolled fugitive emissions of carbon compounds other than VOC & CO are < 10 tpy.
			Carbon Compounds excluding VOC & CO	<p>See additional notes:</p>		Streams that contain H2 also contain HF. Exflur will use the 28AVO program to monitor the fugitive components in HF service. AVO inspections will be done three times per day on weekdays when the site is typically staffed and once each morning on other days such as weekends and holidays.
			H2	<p>See additional notes:</p>		
			MSS	<p>Same as normal operation BACT requirements.</p>		MSS emissions are not authorized in this permit.

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Action Requested	Flgs	Unit Type	Pollutant	Current Tier BACT	Confirm	Additional Notes
New/Modified	FUG3-2	Fugitives: Piping and Equipment Leak	VOC	Specify which is applicable: 1. Uncontrolled VOC emissions < 10 tpy: none 2. 10 tpy < uncontrolled VOC emissions < 25 tpy: 28M leak detection and repair program. 75% credit for 28M. 3. Uncontrolled VOC emissions > 25 tpy: 28VHP leak detection and repair program. 97% credit for valves, 85% for pumps and compressors. 4. VOC vp < 0.002 psia: no inspection required, no fugitive emissions expected. For emissions of approved odorous compounds (chlorine, ammonia, hydrogen sulfide, hydrogen cyanide and mercaptans only): AVO inspection twice per shift. Appropriate credit for AVO program. AVO inspection twice per shift. Appropriate credit for AVO program.	Yes	1. Site uncontrolled VOC fugitive emissions are less than 10 tpy. EPN FUG3-2 uncontrolled VOC fugitive emissions are less than 0.2 tpy.
			HCl		Yes	AVO inspections will be done three times per day on weekdays when the site is typically staffed and once each morning on other days such as weekends and holidays. No reduction credit for HCl fugitives is claimed because TCEQ's APD 6422 guidance for the 28AVO program does not list HCl as an approved chemical. EPN FUG3-2 HCl emissions are less than 0.04 tpy without applying any control credit. Site HCl uncontrolled fugitive emissions are less than 0.1 tpy.
			MSS	Same as normal operation BACT requirements.		MSS emissions are not authorized in this permit.
				Specify which is applicable: 1. Uncontrolled VOC emissions < 10 tpy: none 2. 10 tpy < uncontrolled VOC emissions < 25 tpy: 28M leak detection and repair program. 75% credit for 28M. 3. Uncontrolled VOC emissions > 25 tpy: 28VHP leak detection and repair program. 97% credit for valves, 85% for pumps and compressors. 4. VOC vp < 0.002 psia: no inspection required, no fugitive emissions expected. For emissions of approved odorous compounds (chlorine, ammonia, hydrogen sulfide, hydrogen cyanide and mercaptans only): AVO inspection twice per shift. Appropriate credit for AVO program. AVO inspection twice per shift. Appropriate credit for AVO program.	Yes	1. Site uncontrolled VOC fugitive emissions are less than 10 tpy. EPN FUG3-3 uncontrolled VOC fugitive emissions are less than 0.2 tpy.
New/Modified	FUG3-3	Fugitives: Piping and Equipment Leak	VOC	AVO inspection twice per shift. Appropriate credit for AVO program.	Yes	AVO inspections will be done three times per day on weekdays when the site is typically staffed and once each morning on other days such as weekends and holidays. No reduction credit for HCl fugitives is claimed because TCEQ's APD 6422 guidance for the 28AVO program does not list HCl as an approved chemical. EPN FUG3-3 HCl emissions are less than 0.02 tpy without applying any control credit. Site HCl uncontrolled fugitive emissions are less than 0.1 tpy.
			HCl		Yes	Site uncontrolled fugitive emissions of carbon compounds other than VOC and CO are less than 10 tpy. EPN FUG3-3 uncontrolled fugitive emissions of carbon compounds other than VOC and CO are less than 0.3 tpy.
			Carbon Compounds excluding VOC & CO	See additional notes:		
			MSS	Same as normal operation BACT requirements.		MSS emissions are not authorized in this permit.

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Action Requested	FINS	Unit Type	Pollutant	Current Tier BACT	Confirm	Additional Notes
				Specify which is applicable: 1. Uncontrolled VOC emissions < 10 tpy: none 2. 10 tpy < uncontrolled VOC emissions < 25 tpy: 28M leak detection and repair program. 75% credit for 28M. 3. Uncontrolled VOC emissions > 25 tpy: 28VHP leak detection and repair program. 97% credit for valves, 85% for pumps and compressors. 4. VOC vp < 0.002 psia: no inspection required, no fugitive emissions expected. For emissions of approved odorous compounds (chlorine, ammonia, hydrogen sulfide, hydrogen cyanide and mercaptans only): AVO inspection twice per shift. Appropriate credit for AVO program.		1. Site uncontrolled VOC fugitive emissions are less than 10 tpy. EPN FUG3-4 uncontrolled VOC fugitive emissions are less than 0.3 tpy.
New/Modified	FUG3-4	Fugitives: Piping and Equipment Leak	VOC	AVO inspection twice per shift. Appropriate credit for AVO program.	Yes	AVO inspections will be done three times per day on weekdays when the site is typically staffed and once each morning on other days such as weekends and holidays. No reduction credit for HCl fugitives is claimed because TCEQ's APDG 6422 guidance for the 28AVO program does not list HCl as an approved chemical. EPN FUG3-4 HCl emissions are less than 0.02 tpy without applying any control credit. Site HCl uncontrolled fugitive emissions are less than 0.1 tpy.
			HCl	See additional notes:	Yes	Site uncontrolled fugitive emissions of carbon compounds other than VOC and CO are less than 10 tpy. EPN FUG3-4 uncontrolled fugitive emissions of carbon compounds other than VOC and CO are less than 0.5 tpy.
			Carbon Compounds excluding VOC & CO			
			MSS	Same as normal operation BACT requirements.		MSS emissions are not authorized in this permit.
				Specify which is applicable: 1. Uncontrolled VOC emissions < 10 tpy: none 2. 10 tpy < uncontrolled VOC emissions < 25 tpy: 28M leak detection and repair program. 75% credit for 28M. 3. Uncontrolled VOC emissions > 25 tpy: 28VHP leak detection and repair program. 97% credit for valves, 85% for pumps and compressors. 4. VOC vp < 0.002 psia: no inspection required, no fugitive emissions expected. For emissions of approved odorous compounds (chlorine, ammonia, hydrogen sulfide, hydrogen cyanide and mercaptans only): AVO inspection twice per shift. Appropriate credit for AVO program.		1. Site uncontrolled VOC fugitive emissions are less than 10 tpy. EPN FUG3-5 uncontrolled VOC fugitive emissions are less than 0.01 tpy.
New/Modified	FUG3-5	Fugitives: Piping and Equipment Leak	VOC	See additional notes:	Yes	Site uncontrolled fugitive emissions of carbon compounds other than VOC and CO are less than 10 tpy. EPN FUG3-5 uncontrolled fugitive emissions of carbon compounds other than VOC and CO are less than 0.04 tpy.
			Carbon Compounds excluding VOC & CO			
			MSS	Same as normal operation BACT requirements.		MSS emissions are not authorized in this permit.

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FIN	Unit Type	Pollutant	Minimum Monitoring Requirements	Confirm	Additional Notes for Monitoring
EP3-1	Process Vent	VOC	Production rate or flow as appropriate Monitoring consistent with Control Device	Yes	Exflur will monitor the scrubbing liquid flow rate of the Thermal Oxidizer/Scrubber and the combustion temperatures of the thermal oxidizers.
		HF	See additional notes:		Exflur will monitor the scrubbing liquid flow rate of the Thermal Oxidizer/Scrubber and the combustion temperatures of the thermal oxidizers.
		F2	See additional notes:		Exflur will monitor the scrubbing liquid flow rate of the Thermal Oxidizer/Scrubber and the combustion temperatures of the thermal oxidizers.
		Br2	See additional notes:		Exflur will monitor the scrubbing liquid flow rate of the Thermal Oxidizer/Scrubber and the combustion temperatures of the thermal oxidizers.
		HCl	Production rate or flow as appropriate Monitoring consistent with Control Device	Yes	Exflur will monitor the scrubbing liquid flow rate of the Thermal Oxidizer/Scrubber and the combustion temperatures of the thermal oxidizers.
		HBr	See additional notes:		Exflur will monitor the scrubbing liquid flow rate of the Thermal Oxidizer/Scrubber and the combustion temperatures of the thermal oxidizers.
		NOx	See Additional Notes:		Exflur will monitor the hydrogen fuel flow rate and the combustion temperatures of the thermal oxidizers.
		CO	See Additional Notes:		Exflur will monitor the hydrogen fuel flow rate and the combustion temperatures of the thermal oxidizers.
		Carbon Compounds excluding VOC & CO	See additional notes:		Exflur will monitor the scrubbing liquid flow rate of the Thermal Oxidizer/Scrubber and the combustion temperatures of the thermal oxidizers.
EP3-2	Process Vent	VOC	Production rate or flow as appropriate Monitoring consistent with Control Device	Yes	Exflur will monitor the amount of product processed in the washing reactor and the temperature in the reactor.
EP3-3	Process Vent	VOC	Production rate or flow as appropriate Monitoring consistent with Control Device	Yes	Exflur will monitor the amount of product processed in the washing reactor and the temperature in the reactor.
EP3-4	Process Vent	VOC	Production rate or flow as appropriate Monitoring consistent with Control Device	Yes	Exflur will monitor the Solvent Strip Column 3 feed rates and the associated Thermal Oxidizer combustion temperature.
EP3-5	Wastewater Facilities	VOC	Daily Flow into treatment plant. Quarterly AVO check of water seal where site wastewater emissions >5tpy	Yes	Exflur will monitor the daily flow into the evaporation pond. Monthly, Exflur will monitor the tetrahydrofuran concentration in the water flowing into the pond.
FUG3-1	Fugitives: Piping and Equipment Leak	VOC	For Activated Sludge Biological Treatment, daily mixed liquor suspended solids (MLSS) Monthly wastewater concentration of all air contaminants entering treatment plant. Use EPA Method 21 to monitor for leaks from seals on pumps, compressors, agitator and valve seals on piping components in light liquid and gas VOC service quarterly. Gas or hydraulic check new and a replaced connectors prior to returning to service, or monitor with Method 21 within 15 days of returning to service. Leak detection and repair (LDAR) Program 28M has a leak definition where repair action is required at 10,000 ppmv. LDAR Program 28 VHP has a leak definition where repair action is required at 500 ppmv for valves and connectors and 2000 ppmv for pumps, compressors and agitators. Check connectors weekly using audio, visual or olfactory (AVO) senses to observe leaks. Record results and corrective action taken.	No	Leaks from many of the streams that contain VOC would also contain HF. TOCQ's APDQ 6422 indicates the 28AVO program applies to HF. The 28AVO program will be used to monitor fugitive components on those streams and that monitoring will result in detection of leaks that include VOC. AVO inspections will be done three times per day on weekdays when the site is typically staffed and once each morning on other days such as weekends and holidays. The uncontrolled VOC emissions are < 10 tpy.

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			See additional notes:		TCEQ's APDG 6422 indicates the 28AVO program applies to HF. The 28AVO program will be used to monitor fugitive components where HF would be present in the leaked material. AVO inspections will be done three times per day on weekdays when the site is typically staffed and once each morning on other days such as weekends and holidays.
			See additional notes:		Streams that contain F2 also contain HF. Exflur will use the 28AVO program to monitor the fugitive components in F2 and HF service. AVO inspections will be done three times per day on weekdays when the site is typically staffed and once each morning on other days such as weekends and holidays.
			See additional notes:		Bromine (Br2) has published odor thresholds in a range that is very low, lower than HF in some cases. Therefore, Br2 leaks will be detected during weekly walk-throughs of the building. Uncontrolled Br2 fugitive emissions are less than 0.6 ton per year.
		Carbon Compounds excluding VOC & CO	See additional notes:		Leaks from many of the streams that contain carbon compounds other than VOC and CO would also contain HF. Exflur will use the 28AVO program to monitor those fugitive components. AVO inspections will be done three times per day on weekdays when the site is typically staffed and once each morning on other days such as weekends and holidays. Uncontrolled fugitive emissions of carbon compounds other than VOC and CO are < 10 tpy.
		H2	See additional notes:		Streams that contain H2 also contain HF. Exflur will use the 28AVO program to monitor the fugitive components in HF service. AVO inspections will be done three times per day on weekdays when the site is typically staffed and once each morning on other days such as weekends and holidays.
FUG3-2	Fugitives: Piping and Equipment Leak	VOC	Use EPA Method 21 to monitor for leaks from seals on pumps, compressors, agitator and valve seals on piping components in light liquid and gas VOC service quarterly. Gas or hydraulic check new and a replaced connectors prior to returning to service, or monitor with Method 21 within 15 days of returning to service. Leak detection and repair (LDAR) Program 28M has a leak definition where repair action is required at 10,000 ppmv. LDAR Program 28 VHP has a leak definition where repair action is required at 500 ppmv for valves and connectors and 2000 ppmv for pumps, compressors and agitators. Check connectors weekly using audio, visual or olfactory (AVO) senses to observe leaks. Record results and corrective action taken.	No	VOC leaks will be detected during weekly walk-throughs of the EPN FUG3-2 area. EPN FUG3-2 VOC fugitive emissions are less than 0.2 ton per year. Site VOC uncontrolled fugitive emissions are less than ten tons per year. Therefore, the 28 series LDAR programs are not required.
		HCl	Look for leaks twice per shift using audio, visual or olfactory (AVO) senses to observe leaks. Record results and corrective action taken.	Yes	AVO inspections will be done three times per day on weekdays when the site is typically staffed and once each morning on other days such as weekends and holidays. EPN FUG3-2 HCl emissions are less than 0.04 tpy without applying any control credit. Site HCl uncontrolled fugitive emissions are less than 0.1 tpy.

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FUG3-3	Fugitives: Piping and Equipment Leak	VOC	Use EPA Method 21 to monitor for leaks from seals on pumps, compressors, agitator and valve seals on piping components in light liquid and gas VOC service quarterly. Gas or hydraulic check new and a replaced connectors prior to returning to service, or monitor with Method 21 within 15 days of returning to service. Leak detection and repair (LDAR) Program 28M has a leak definition where repair action is required at 10,000 ppmv. LDAR Program 28 VHP has a leak definition where repair action is required at 500 ppmv for valves and connectors and 2000 ppmv for pumps, compressors and agitators. Check connectors weekly using audio, visual or olfactory (AVO) senses to observe leaks. Record results and corrective action taken.	No	VOC leaks will be detected during weekly walk-throughs of the EPN FUG3-3 area. EPN FUG3-3 VOC fugitive emissions which are less than 0.2 ton per year. Site VOC uncontrolled fugitive emissions are less than ten tons per year. Therefore, the 28 series LDAR programs are not required.
		HCl	Look for leaks twice per shift using audio, visual or olfactory (AVO) senses to observe leaks. Record results and corrective action taken.	Yes	AVO inspections will be done three times per day on weekdays when the site is typically staffed and once each morning on other days such as weekends and holidays. EPN FUG3-3 uncontrolled HCl emissions are less than 0.02 tpy. Site HCl uncontrolled fugitive emissions are less than 0.1 tpy.
		Carbon Compounds excluding VOC & CO	See additional notes:		Leaks of carbon compounds other than VOC and CO will be detected during weekly walk-throughs of the EPN FUG3-3 area. EPN FUG3-3 fugitive emissions of those compounds are less than 0.3 ton per year. Site uncontrolled fugitive emissions of carbon compounds other than VOC and CO are less than ten tons per year.
FUG3-4	Fugitives: Piping and Equipment Leak	VOC	Use EPA Method 21 to monitor for leaks from seals on pumps, compressors, agitator and valve seals on piping components in light liquid and gas VOC service quarterly. Gas or hydraulic check new and a replaced connectors prior to returning to service, or monitor with Method 21 within 15 days of returning to service. Leak detection and repair (LDAR) Program 28M has a leak definition where repair action is required at 10,000 ppmv. LDAR Program 28 VHP has a leak definition where repair action is required at 500 ppmv for valves and connectors and 2000 ppmv for pumps, compressors and agitators. Check connectors weekly using audio, visual or olfactory (AVO) senses to observe leaks. Record results and corrective action taken.	No	VOC leaks will be detected during weekly walk-throughs of the EPN FUG3-4 area. EPN FUG3-4 VOC fugitive emissions are less than 0.3 ton per year. Site VOC uncontrolled fugitive emissions are less than ten tons per year. Therefore, the 28 series LDAR programs are not required.
		HCl	Look for leaks twice per shift using audio, visual or olfactory (AVO) senses to observe leaks. Record results and corrective action taken.	Yes	AVO inspections will be done three times per day on weekdays when the site is typically staffed and once each morning on other days such as weekends and holidays. EPN FUG3-4 uncontrolled HCl emissions are less than 0.02 tpy. Site HCl uncontrolled fugitive emissions are less than 0.1 tpy.
		Carbon Compounds excluding VOC & CO	See additional notes:		Leaks of carbon compounds other than VOC and CO will be detected during periodic walk-throughs of the EPN FUG3-4 area. EPN FUG3-4 fugitive emissions of those compounds are less than 0.5 ton per year. Site uncontrolled fugitive emissions of carbon compounds other than VOC and CO are less than ten tons per year.

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FUG3-5	Fugitives: Piping and Equipment Leak	VOC	<p>Use EPA Method 21 to monitor for leaks from seals on pumps, compressors, agitator and valve seals on piping components in light liquid and gas VOC service quarterly. Gas or hydraulic check new and a replaced connectors prior to returning to service, or monitor with Method 21 within 15 days of returning to service. Leak detection and repair (LDAR) Program 28M has a leak definition where repair action is required at 10,000 ppmv. LDAR Program 28 VHP has a leak definition where repair action is required at 500 ppmv for valves and connectors and 2000 ppmv for pumps, compressors and agitators. Check connectors weekly using audio, visual or olfactory (AVO) senses to observe leaks. Record results and corrective action taken.</p> <p>See additional notes:</p>	No	<p>VOC leaks will be detected during weekly walk-throughs of the EPN FUG3-5 area. EPN FUG3-5 VOC fugitive emissions are less than 0.01 ton per year. Site VOC uncontrolled fugitive emissions are less than ten tons per year. Therefore, the 28 series LDAR programs are not required.</p>
	Carbon Compounds excluding VOC & CO				<p>Leaks of carbon compounds other than VOC and CO will be detected during periodic walk-throughs of the EPN FUG3-5 area. EPN FUG3-5 fugitive emissions of those compounds are less than 0.04 ton per year. Site uncontrolled fugitive emissions of carbon compounds other than VOC and CO are less than ten tons per year.</p>

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Materials

July 2021
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 Exflur Research Corporation

Item	How submitted	Date submitted
A. Administrative Information		
Form PI-1 General Application	STEERS	07/09/2021
Hard copy of the General sheet with original (ink) signature	STEERS	07/09/2021
Professional Engineer Seal	STEERS	07/09/2021
B. General Information		
Copy of current permit (both Special Conditions and MAERT)		
Core Data Form	Not applicable	
Area map	STEERS	07/09/2021
Plot plan	STEERS	07/09/2021
Process description	STEERS	07/09/2021
Process flow diagram	STEERS	07/09/2021
List of MSS activities		
State regulatory requirements discussion	STEERS	07/09/2021
C. Federal Applicability		
Summary and project emission increase determination - Tables 1F and 2F	Not applicable	
Netting analysis (if required) - Tables 3F and 4F as needed	Not applicable	
D. Technical Information		
BACT discussion, if additional details are attached	STEERS	07/09/2021
Monitoring information, if additional details are attached	Not applicable	
Material Balance (if applicable)	STEERS	07/09/2021
Calculations	STEERS	07/09/2021
E. Impacts Analysis		
Qualitative impacts analysis	STEERS	07/09/2021
MERA analysis	STEERS	07/09/2021
EMEW: SCREEN3	Not applicable	
EMEW: NonSCREEN3	STEERS	07/09/2021
PSD modeling protocol	Not applicable	
F. Additional Attachments		

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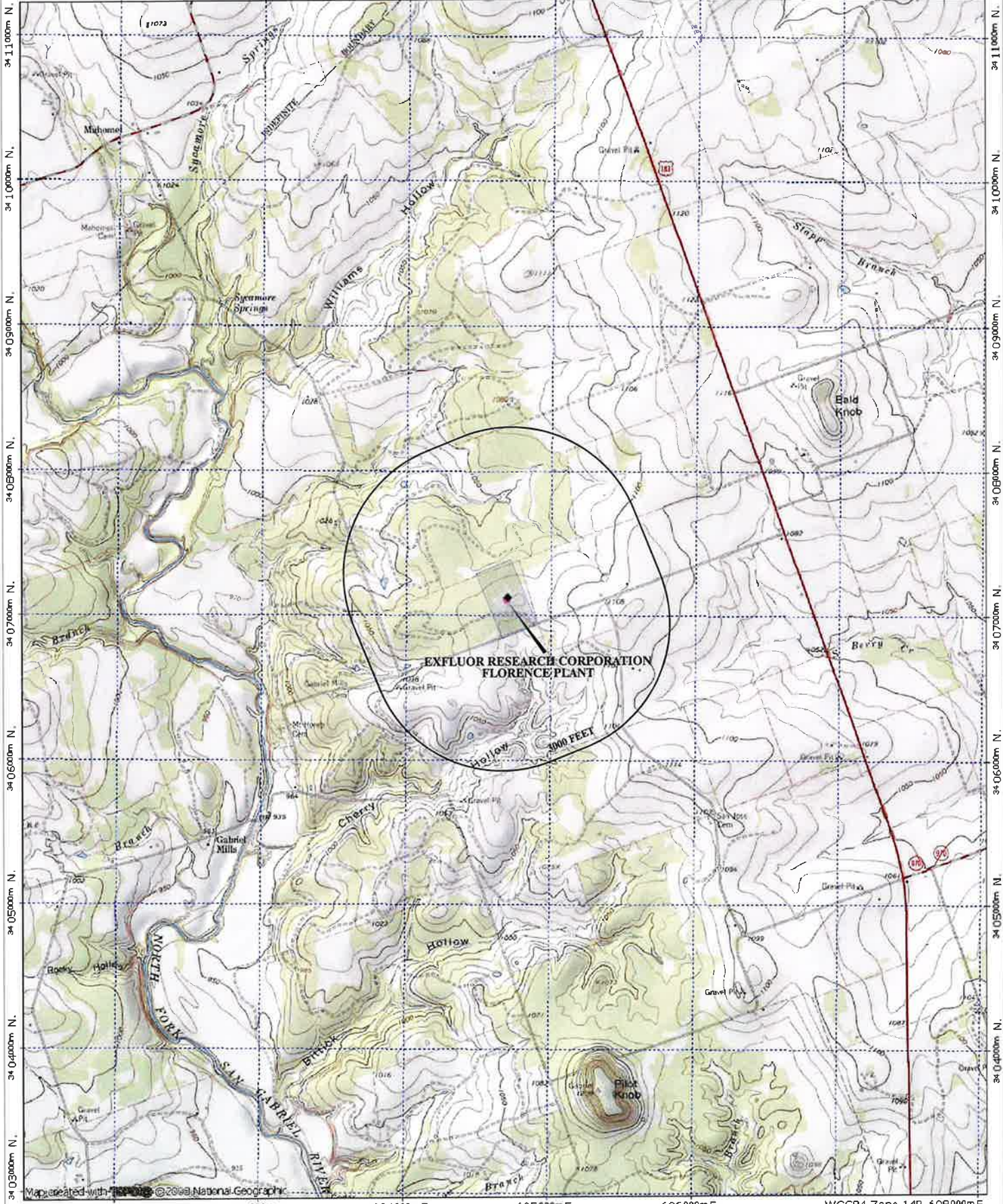
EXECUTIVE SUMMARY

Exflor Research Corporation (Exflor) proposes to build and operate a specialty chemicals manufacturing facility that will be located near Florence in Williamson County. The facility will be authorized to convert hydrocarbons to fluorocarbons. The detailed process description for the site is provided in the confidential volume of this application.

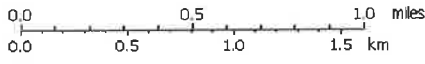
AREA MAP

30°47'33" N, 97°54'21" W WGS84 1964 Mahomet, TX

602000m.E. 603000m.E. 604000m.E. 605000m.E. 606000m.E. 607000m.E.



Map created with ©2009 National Geographic WGS84 Zone 14R 608000m.E.



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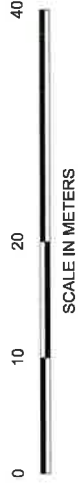
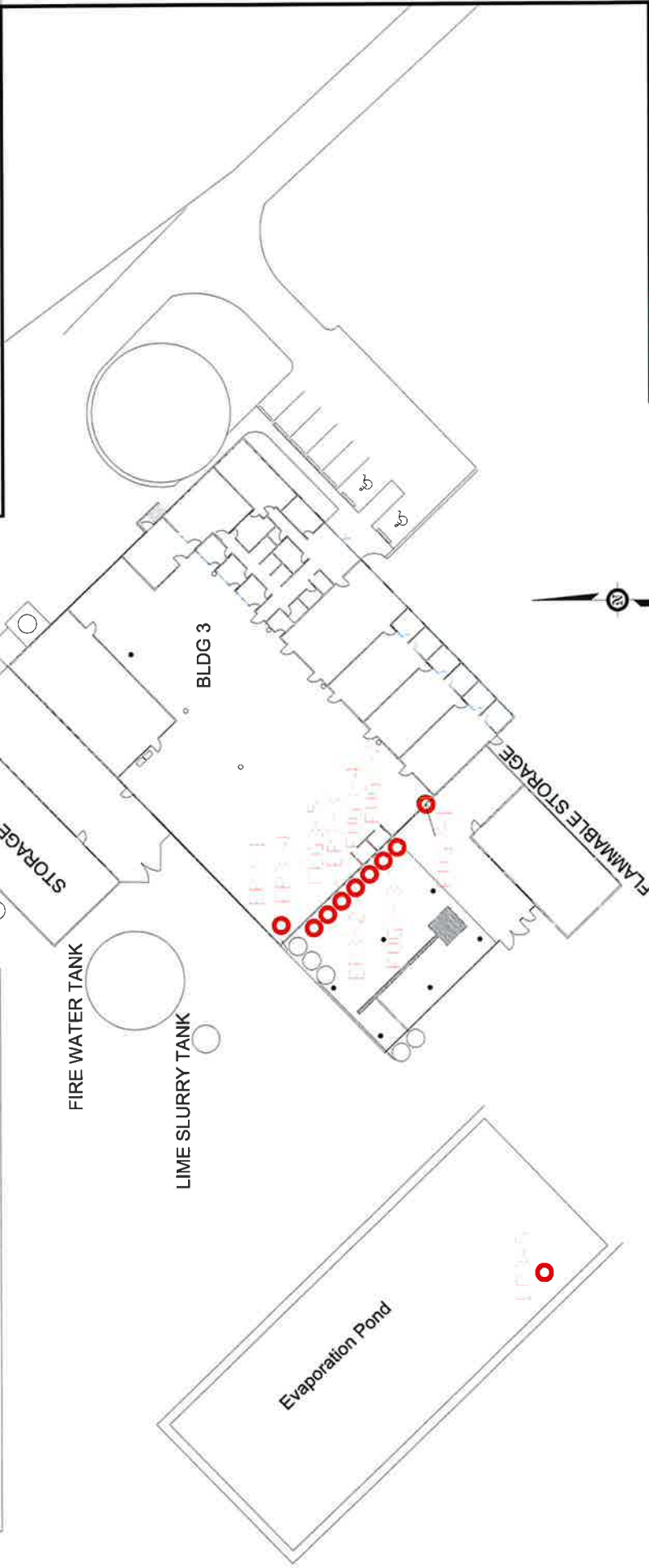
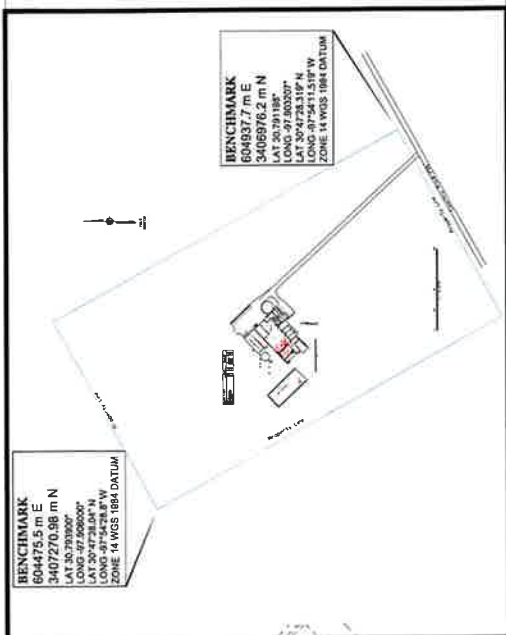


APP-00033

PLOT PLAN

Downwash Structure Name	Height (feet)	Height (meters)	Dimensions (meters)
BLDG 3	30.0	9.14	41.66 x 34.79
FIRE WATER TANK	16.0	4.88	Diameter 10.49
FLAMMABLE STORAGE	16.0	4.88	15.13 x 8.20
LIME SLURRY TANK	10.0	3.05	Diameter 2.95
STORAGE BLDG	16.0	4.88	24.82 x 9.90

Emission Point Number	Name	Location Easting, Northing
EP3-1	EXHAUST GAS VENT SYSTEM	604666, 3407123
EP3-2	WASHING REACTOR 1	604670, 3407115
EP3-3	WASHING REACTOR 2	604669, 3407117
EP3-4	SOLVENT WATER RESERVOIR	604666, 3407120
EP3-5	EVAPORATION POND	604629, 3407095
FUG3-1	BUILDING 3 FUGITIVES	604679, 3407108
FUG3-2	REDUCTION REACTOR 1	604675, 3407111
FUG3-3	REDUCTION REACTOR 3	604673, 3407112
FUG3-4	REDUCTION REACTOR 4	604672, 3407114
FUG3-5	SOLVENT STRIP COLUMN 3	604668, 3407118



WAD AND ASSOCIATES
EXFLUOR RESEARCH CORPORATION
ROUND ROCK FACILITY

Client: EXFLUOR
Date: 2/7/08
DWG: 6/18/21
PL011
Sheet: 4 of 4

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PROCESS FLOW DIAGRAM

The Process Flow Diagram (PFD) is confidential and is included in the separate confidential volume of this application.

PROCESS DESCRIPTION

The Process Description is confidential and is included in the separate confidential volume of this application.

EMISSIONS CALCULATIONS

The emissions calculation are confidential and are included in the separate confidential volume of this application.

MAINTENANCE, STARTUP, AND SHUTDOWN ACTIVITIES

During maintenance, startup or shutdown (MSS) activities, there will not be any emissions from any of the sources authorized in this permit application that exceed the emission rates during normal operation. Any MSS activity emissions will be authorized by Permit by Rule §106.263.

STATE REGULATORY REQUIREMENTS

CITATION	CITATION DESCRIPTION	APPLICABLE?	COMMENT
Chapter 101	General Rules		
§101.2	Multiple Air Contaminant Sources or Properties	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Exflur is not petitioning the commission to designate two or more properties as a single property.
§101.3.	Circumvention	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	Exflur will not use a plan, activity, device or contrivance to conceal or appear to minimize an emission violation of the Act or a regulation.
§101.4	Nuisance	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	The facility will not discharge air contaminants in such concentration/duration to be injurious or adversely affect human health or welfare, or interfere with the normal use/enjoyment of animal life, vegetation, or property.
§101.5	Traffic Hazard	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	The facility will not discharge air contaminants, uncombined water, or other materials from any source that causes or has a tendency to cause a traffic hazard or interfere with normal road use.
§101.8 and §101.9	Sampling and Sampling Ports	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	Exflur will comply with the applicable requirements if requested by the board or Executive Director to conduct sampling.
§101.10.	Emissions Inventory Requirements	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Exflur will not be required to submit an annual Emissions Inventory since the facility is not a major source and the proposed allowable emissions are less than the threshold amounts.
§101.14.	Sampling Procedures and Terminology	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	Exflur will employ commonly accepted methods and procedures for sampling/measuring air contaminants when otherwise not specified in rules, regulations, determinations and/or orders by the commission.
§101.20.	Compliance with Environmental Protection Agency Standards	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	The sources in this application will be operated to comply with the applicable Environmental Protection Agency Standards as detailed in this supporting documentation.
§101.21.	The National Primary and Secondary Ambient Air Quality Standards	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	The sources in this application will be operated in accordance with the National Primary and Secondary Air Quality Standards.
§101.23.	Alternate Emission Reduction (Bubble) Policy	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Exflur does not seek approval of emission controls from another facility at this site in lieu of controlling the sources as explained in this application.

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§101.24.	Inspection Fees	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Does not apply. This facility operates under SIC code 2869 and has a proposed production capacity of less than 1 million lbs/yr of organic chemicals. The SIC Code "2869 – Organic Chemicals" part of the table in §101.24(f) does not indicate an annual inspection fee for a capacity of less than 1 million lbs/yr.
§101.26.	Surcharge on Fuel Oil in Specified Boilers	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	There is not an industrial boiler or utility boiler as defined in §101.1 associated with this application.
§101.27.	Emissions Fees	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Exflur is not required to submit an annual emissions fee because the account does not meet any of the conditions of applicability specified in §101.27(a): The account does not emit or have the potential to emit, at maximum operation or design capacity, 100 tons per year (tpy) or more of any single air pollutant; the account is not located in a serious or severe ozone nonattainment area; the account does not emit ten tpy or more of any single hazardous air pollutant (HAP); the account does not emit an aggregate of 25 tpy or more of HAP compounds; the account is not subject to the National Emission Standards for Hazardous Air Pollutants (40 CFR Part 61); the account is not subject to the control requirements or emission limitations for New Source Performance Standards (40 CFR Part 60); the account is not subject to the Prevention of Significant Deterioration (40 CFR Part 52) requirements; and the account is not subject to the Acid Deposition provisions in the FCAA Amendments of 1990, Title IV.
§101.28.	Stringency Determination for Federal Operating Permits	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	The site is not required to have a federal operating permit since it is not a major source.
§101.201.	Emissions Event Reporting and Recordkeeping Requirements	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	Exflur will comply with the emissions events reporting and recordkeeping requirements.
§101.211.	Scheduled Maintenance, Startup, and Shutdown Reporting and Recordkeeping Requirements	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	Exflur will comply with the reporting and recordkeeping requirements for scheduled maintenance, startup, and shutdown activities.

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CITATION	CITATION DESCRIPTION	APPLICABLE?	COMMENT
§101.221 through §101.224.	Operational Requirements, Demonstrations, and Actions to Reduce Excessive Emissions	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	Exflur will comply with the applicable requirements of §101.221 through §101.224.
§101.231 through §101.233.	Variances	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Exflur is not seeking a variance.
§101.300 through §101.311.	Emission Credit Banking and Trading	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Exflur does not participate in the emissions credit banking and trading system for this site.
§101.330 through §101.339.	Emission Banking and Trading of Allowances	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	The site does not include an electric generating unit permitted under Chapter 116, Subchapter I.
§101.350 through §101.363.	Mass Emissions Cap and Trade Program	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	The site is not located in the Houston/Galveston nonattainment area subject to §117.106, §117.206, or §117.475
§101.370 through §101.379.	Discrete Emission Credit Banking and Trading	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Exflur does not participate in this voluntary reduction program.
§101.390 through §101.403.	Highly Reactive Volatile Organic Compound Emission Cap and Trade Program	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	This site is not located in the Houston/Galveston nonattainment area.
Chapter 111.	Visible Emissions		
§111.111 through §111.113.	Visible Emissions	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Visible emissions are not expected from the sources associated with this application.
§111.121 through §111.129.	Incineration	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	There is not an incinerator associated with this application that burns domestic, commercial, or industrial solid waste as defined in §101.1, medical waste, or hazardous waste as fuel for energy recovery.
§111.131 through §111.139.	Abrasive Blasting of Water Storage Tanks Performed by Portable Operations	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Abrasive blasting of water storage tanks performed by portable operations will not be performed at the facility as part of this application.

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CITATION	CITATION DESCRIPTION	APPLICABLE?	COMMENT
§111.141 through §111.149.	Materials Handling, Construction, Roads, Streets, Alleys, and Parking Lots	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	The site is located in Williamson County which is not listed as an affected area.
§111.151.	Allowable Emissions Limits	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	There are no PM emissions expected from the sources associated with this application.
§111.153.	Emissions Limits on Steam Generators	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	There are no steam generators with heat input greater than 2500 MM Btu/hr or any solid fossil fuel-fired steam generators associated with this application.
§111.171 through §111.175.	Emissions Limits on Agricultural Processes	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	There are no agricultural processes associated with this application.
§111.181 through §111.183.	Exemptions for Portable or Transient Operations	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	There are no portable or transient operations such as rock crushers, hot mix asphaltic concrete facilities, etc., associated with this application.
§111.201 through §111.221.	Outdoor Burning	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Outdoor burning will not be conducted at the facility as part of this application.
Chapter 112.	Sulfur Compounds		
§112.3 through §112.4.	Net Ground Level Concentrations	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	The sources in this application do not emit sulfur compounds.
§112.5 and §112.6.	Allowable Emission Rates - Sulfuric Acid Plants	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	There is not an affected sulfuric acid plant associated with this application.
§112.7.	Allowable Emission Rates - Sulfur Recovery Plant	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	There is not an affected sulfur recovery plant associated with this application.
§112.8.	Allowable Emission Rates from Solid Fossil Fuel-Fired Steam Generators	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	There is not a solid fossil fuel-fired steam generator associated with this application.
§112.9.	Allowable Emission Rates - Combustion of Liquid Fuel	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	There is not a combustion unit associated with this application
§112.14.	Allowable Emission Rates from Nonferrous Smelter Processes	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	There is not an affected nonferrous smelter process associated with this application.

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CITATION	CITATION DESCRIPTION	APPLICABLE?	COMMENT
§112.15 through §112.18.	Temporary Fuel Shortage Plan	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	This application does not contain a combustion source that would require a temporary fuel shortage plan.
§112.19 through §112.21.	Area Control Plan	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Exfluor does not intend to apply for an Area Control Plan at this time.
§112.31 through §112.34.	Control of Hydrogen Sulfide	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	The sources associated with this application are not expected to emit H ₂ S.
§112.41 through §112.47.	Control of Sulfuric Acid	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	The sources associated with this application are not expected to emit sulfuric acid.
§112.51 through §112.59.	Control of Total Reduced Sulfur	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	The Exfluor facility is not a kraft pulp mill.
Chapter 113.	Toxic Materials	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	The facility is not subject to any standard in this chapter. The facility is potentially subject to the National Emission Standards for Hazardous Air Pollutants for the Source Category Synthetic Organic Chemical Manufacturing Industry (40 CFR 63, Subpart F); however, emissions of HAP are below the applicable level.
Chapter 115.	Volatile Organic Compounds		
§115.110 through §115.119.	Storage of Volatile Organic Compounds	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	There is not an affected storage facility associated with this application.
§115.120 through §115.129.	Vent Gas Control	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	There is no affected vent source associated with this application because the Exfluor facility is not located in an affected county under §115.120 through §115.129.
§115.131 through §115.139.	Water Separation	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	There is not an affected water separation facility associated with this application because the Exfluor facility is not located in an affected county under §115.131 through §115.139.

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CITATION	CITATION DESCRIPTION	APPLICABLE?	COMMENT
§115.140 through §115.149.	Industrial Wastewater	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	There is not an affected VOC wastewater stream associated with this application because the Exflur facility is not located in an affected county under §115.140 through §115.149.
§115.152 through §115.159.	Municipal Solid Waste Landfills	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	There is not an affected municipal solid waste landfill source associated with this application.
§115.160 through §115.169.	Batch Processes	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	There is not an affected batch process associated with this application because the Exflur facility is not located in an affected county under §115.160 through §115.169.
§115.211 through §115.219.	Loading and Unloading of Volatile Organic Compounds	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	There is not an affected loading or unloading facility associated with this application because Exflur is not an owner or operator of a land-based VOC transfer operation or transport vessel.
§115.221 through §115.229.	Filling of Gasoline Storage Vessels (Stage I) for Motor Vehicle Fuel Dispensing Facilities	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	There is not an affected vehicle fuel dispensing facility associated with this application.
§115.234 through §115.239.	Control of Volatile Organic Compound Leaks from Transport Vessels	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	The sources in this application are not associated with filling or emptying gasoline tank trucks.
§115.240 through §115.248.	Control of Vehicle Refueling Emissions (Stage II) at Motor Vehicle Fuel Dispensing Facilities	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	There is not an affected motor fuel dispensing facility associated with this application.
§115.252 through §115.259.	Control of Reid Vapor Pressure of Gasoline	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	The sources associated with this application do not handle, store, and/or transfer gasoline.
§115.311 through §115.319.	Process Unit Turnaround and Vacuum-Producing Systems	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	There is no affected source associated with this application..
§115.322 through §115.329.	Fugitive Emission Control in Petroleum Refineries in Gregg, Nueces, and Victoria Counties	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	The Exflur facility is not a petroleum refinery or located in Gregg, Nueces, or Victoria Counties.

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CITATION	CITATION DESCRIPTION	APPLICABLE?	COMMENT
§115.352 through §115.359.	Fugitive Emission Control in Petroleum Refining, Natural Gas/Gasoline Processing, and Petrochemical Processes in Ozone Nonattainment Areas	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	There is not an affected fugitive source associated with this application.
§115.410 through §115.419.	Degreasing Processes	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	There is not an affected degreasing facility associated with this application.
§115.420 through §115.429.	Surface Coating Processes	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	There is not an affected surface coating facility associated with this application.
§115.430 through §115.439.	Flexographic and Rotogravure Printing	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	There is not an affected rotogravure or flexographic process associated with this application.
§115.440 through §115.449.	Offset Lithographic Printing	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	There is not an affected offset lithographic printing facility associated with this application.
§115.450 through §115.459.	Control Requirements for Surface Coating Processes	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	The site is not located in the Dallas-Fort Worth or Houston-Galveston-Brazoria areas.
§115.460 through §115.469.	Industrial Cleaning Solvents	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	The site is not located in the Dallas-Fort Worth or Houston-Galveston-Brazoria areas.
§115.470 through §115.479.	Miscellaneous Industrial Adhesives	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	The site is not located in the Dallas-Fort Worth or Houston-Galveston-Brazoria areas.
§115.510 through §115.519.	Cutback Asphalt	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	There is not a source of cutback asphalt associated with this application.
§115.531 through §115.539.	Pharmaceutical Manufacturing Facilities	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	There is not an affected pharmaceutical manufacturing facility associated with this application.

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CITATION	CITATION DESCRIPTION	APPLICABLE?	COMMENT
§115.540 through §115.549.	Degassing or Cleaning of Stationary, Marine, and Transport Vessels	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	There is not an affected degassing or cleaning facility associated with this application.
§115.552 through §115.559.	Petroleum Dry Cleaning Systems	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	There is not an affected petroleum dry cleaning system associated with this application.
§115.600 through §115.619.	Automotive Windshield Washer Fluid	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Exflur does not sell, supply, offer for sale, distribute, or manufacture automotive windshield washer fluid as defined in §115.600.
§115.720 through §115.729.	Vent Gas Control	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	The facility is not located in the Houston/Galveston/Brazoria area.
§115.760 through §115.769.	Cooling Tower Heat Exchange Systems	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	The facility is not located in the Houston/Galveston area.
§115.780 through §115.789.	Fugitive Emissions	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	The facility is not located in the Houston/Galveston area.
§115.901 through §115.916.	Alternate Means of Control	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	No insignificant emissions or alternate means of control are proposed.
§115.920 and §115.923.	Early Reductions	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	An extension of the compliance date is not requested.
§115.930 through §115.940.	Compliance and Control Plan Requirements	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	There are no relevant compliance dates or control plan requirements.
§115.950.	Emissions Trading	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Exflur is not participating in the emissions trading system to meet the emission control requirements.
Chapter 117.	Nitrogen Oxides	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Chapter 117 is not applicable because the site is not located in an affected county and/or the site does not operate an affected facility.

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CITATION	CITATION DESCRIPTION	APPLICABLE?	COMMENT
Chapter 122.	Federal Operating Permits	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	The Exfluor facility is not a major source subject to the federal operating permit program in §122.130(b).

BEST AVAILABLE CONTROL TECHNOLOGY (BACT)

State New Source Review (NSR) regulations in 30 TAC 116 are applicable to the Exflur facilities. State permitting requirements provide that new or modified facilities must utilize Best Available Control Technology (BACT).

TCEQ air permitting rule §116.10(3) defines BACT as the best available control technology "with consideration given to the technical practicability and the economic reasonableness of reducing or eliminating emissions from the facility." The TCEQ adopted the following three-tiered review process, as indicated in the TCEQ guidance document entitled, "Air Pollution Control," dated April 2001, APDG 6110.

Tier I BACT review accepts recent permit reviews for the same process/industry and are approvable for BACT in the current review as long as there have been no developments since then which would justify more stringent requirements based on economical reasonableness and technical practicability. These control technologies have already been demonstrated as technically practicable and economically reasonable thereby facilitating the Tier I review process. Should a proposed facility's performance be at least as good as the accepted Tier I BACT level then no further analysis or demonstration of BACT is needed. Otherwise a Tier II BACT analysis is required.

Tier II BACT review involves consideration of control levels achieved and accepted by the TCEQ in recent permits for similar streams but in different process/industry. Tier II BACT review may require additional research to review across industries, but an in-depth economic analysis is not required since it has already been demonstrated by use.

Tier III BACT review requires a detailed technical and economic analysis of alternative emission reduction options available for the facility being reviewed. Technical practicability is evaluated by considering the demonstrated success of a control technology option based on its previous use, and/or by performing an engineering evaluation of the availability and reliability of a proposed control system. Economic reasonableness is determined by the cost effectiveness of controlling emissions and does not take into account the effect of control cost on the permit applicant's corporate economics. It is evaluated on a dollar-per-ton basis considering both incremental and total tons controlled, although the focus is primarily on the dollar-per-total ton number. Tier III BACT review is not routinely necessary because technical practicability and economic reasonableness have usually been firmly established by industry practice as identified in the first two tiers.

As described in the following subsections, Exflur will employ emission control measures that meet current BACT for all new sources represented in the application.

Process Vents

The process vents from the Fluorine Generators, Fluorination Reactors, Thermal Cracking Reactors, Distillation Units, Polishing Reactors, Reduction Reactors, Hydrolysis Reactors, Methanolysis Reactors, Bromination Reactors, Extraction Tank, Anhydride Flasks, Acrylate Flasks, and Drying Flask are routed to an Exhaust Gas Vent System (EPN EP3-1).

The majority of the equipment vents into a central vent system that is connected to a series of control devices. In the first control device, the vent gases pass through the F₂ Scrubber to remove residual, unreacted fluorine, from the gas stream. Hydrogen gas, a byproduct of fluorine production, is present in the F₂ Scrubber. The hydrogen and fluorine react to give hydrogen fluoride. Next, the vent stream passes through the HF Recovery System where the HF is captured and fed into the fluorine generators. Finally, the vent stream passes through the Thermal Oxidizers 1 and 2 where trace amounts of fluorine, hydrogen fluoride and functional fluorocarbons are thermally decomposed and removed in an aqueous scrubber before the exhaust stream is emitted to the atmosphere. Thermal Oxidizer 3 is used to treat the remainder of the emissions from the stills and the other equipment used for further purification. Still condensers are under a constant nitrogen purge which is connected to a central vent system to Thermal Oxidizer 3. The still receiver vents are also connected to this same central vent system to Thermal Oxidizer 3.

This combination of HF Recovery Units and Exhaust Gas Vent System thermal oxidizers/scrubbers achieves at least 99.9% control of VOCs, other organic compounds, HF and other inorganic acids. Therefore, this control system meets TCEQ Tier 1 BACT requirements.

The process vents from Washing Reactor 1 (EPN EP3-2), Washing Reactor 2 (EPN EP3-3), and Water Reservoir (EPN EP3-4) release less than 0.2 ton/yr, less than 0.3 ton/yr, and less than 0.3 ton/yr of VOCs to the atmosphere, respectively. Due to the low VOC emission rates from each of these units, there are no control devices that could be installed on these process vents that would meet the BACT requirement of being economically reasonable.

Wastewater Facilities

Stripped gases from Solvent Strip Column 3 are routed to a Thermal Oxidizer for destruction of VOC. Solvent Strip Column 3 removes 99% of VOC from the wastewater and the Thermal Oxidizer destroys 99.9% of the VOC vented from the solvent strip column. Evaporation Pond (EPN EP3-5) releases less than 0.05 ton/yr of VOCs to the atmosphere. Due to the low VOC emission rate from this unit, there are no additional controls that could be installed on this unit that would meet the BACT requirement of being economically reasonable.

Fugitive Emissions

Leaks from some streams that contain VOC would also contain HF. TCEQ's APDG 6422 indicates the 28AVO Leak Detection and Repair (LDAR) program applies to HF. The 28AVO program will be used to monitor fugitive components on those streams that would have HF in the leaked material and that monitoring will result in detection of VOC leaks from those components. AVO inspections for HF will be done three times per day on weekdays when the site is typically staffed and once each morning on other days such as weekends and holidays. Uncontrolled VOC fugitive emissions are less than ten tons per year. Therefore, TCEQ Tier 1 BACT does not require additional control of those emissions.

Additionally, air in the rooms where HF fugitive emissions may occur will be monitored for HF continuously. Alarms from the continuous monitors will be responded to by conducting AVO inspections and tests to locate the source of any leak, isolate the leak, commence repair or replacement of the leaking components, or use a leak collection/containment system to prevent

the leak until repair or replacement can be made if immediate repair is not possible. Exflur believes that this combination of AVO inspections and continuous monitoring with alarms is at least as good as TCEQ Tier 1 BACT for VOC and HF fugitive emissions control. BACT for other fugitive emission pollutants is addressed in the TCEQ NSR workbook.

NONATTAINMENT REVIEW

This provision is not applicable since the Exflur site is not a major source or a major modification and is not located in an area designated as being in nonattainment of any National Ambient Air Quality Standard (NAAQS).

PREVENTION OF SIGNIFICANT DETERIORATION REVIEW

As defined by 40 CFR 52.21, PSD review does not apply because the Exflur site is not a major source and this permit application does not propose a major project by itself.

APPENDIX A
IMPACTS ANALYSIS

Texas Commission on Environmental Quality
Initial Permit Amendment Application
Air Quality Modeling Analysis

Exflur Research Corporation
Florence Site

Florence, Williamson County
Air Quality Account ID No. TBD
Regulated Entity No. RN110969227
Customer No. CN602696791

July 2021

Prepared by:




Steven DeNero
Senior Air Dispersion Modeler

Prepared and Approved by:



Joerg Windolph, P.E.
Principal Engineer


7/7/2021

Waid Corporation dba Waid Environmental
Certificate of Registration No. F-58

Document based on information provided by
Exflur Research Corporation
Waid Project No. EXF14242



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2.0	AREA MAP
3.0	MODELING RESULTS
4.0	ELECTRONIC INFORMATION

APPENDIX – EMISSIONS SUMMARY TABLES AND MODELED RELEASE PARAMETERS

SECTION 1.0

PLOT PLAN

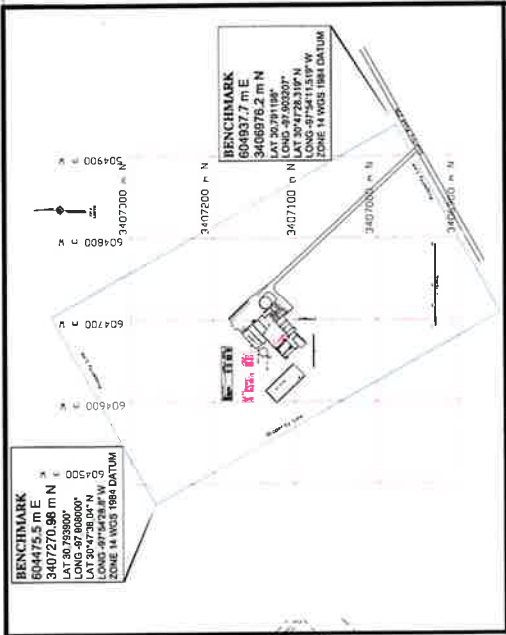
The plot plan of the Florence Site includes a clearly marked scale, all property lines, all emission points associated with the project analysis, a true north arrow, reference UTM coordinates, and all buildings and structures which could create downwash effects for the emission points associated with the project analysis.

The property lines indicated on the map represent the extents of Florence Site's property. The UTM coordinates are based on North American Datum (NAD83) system. The lengths, widths, and heights of the structures included in this AQA are all summarized in a table on the plot plan, and an electronic file summarizing their heights has been submitted with the modeling input/output files via the TCEQ's FTP website.

Downwash Structure	Height (feet)	Height (meters)	Dimensions (meters)
BLDG 3	30.0	9.14	41.66 x 34.79
FIRE WATER TANK	16.0	4.88	Diameter 10.49
FLAMMABLE STORAGE	16.0	4.88	15.13 x 8.20
LIME SLURRY TANK	10.0	3.05	Diameter 2.95
STORAGE BLDG	16.0	4.88	24.82 x 9.90

Emission Point Number	Name	Location Easting, Northing (meters)
EP31	EXHAUST GAS VENT SYSTEM W RAINCAP	604666, 3407123

1. The following information was obtained from the site visit on 11/11/21:
 2. The structure is a gas vent system with a raincap.
 3. The structure is located on the roof of BLDG 3.
 4. The structure is approximately 10 meters in diameter.
 5. The structure is approximately 16 meters in height.
 6. The structure is located in the center of the roof.
 7. The structure is located in the center of the roof.
 8. The structure is located in the center of the roof.
 9. The structure is located in the center of the roof.
 10. The structure is located in the center of the roof.



WALD AND ASSOCIATES
 EXFLUOR RESEARCH CORPORATION
 ROUND ROCK FACILITY
 2/7/08 7/1/21 WDL PLDT: 5
 \\CLIENTS\EXFLUOR\EXT\14242\ACAD

SECTION 2.0

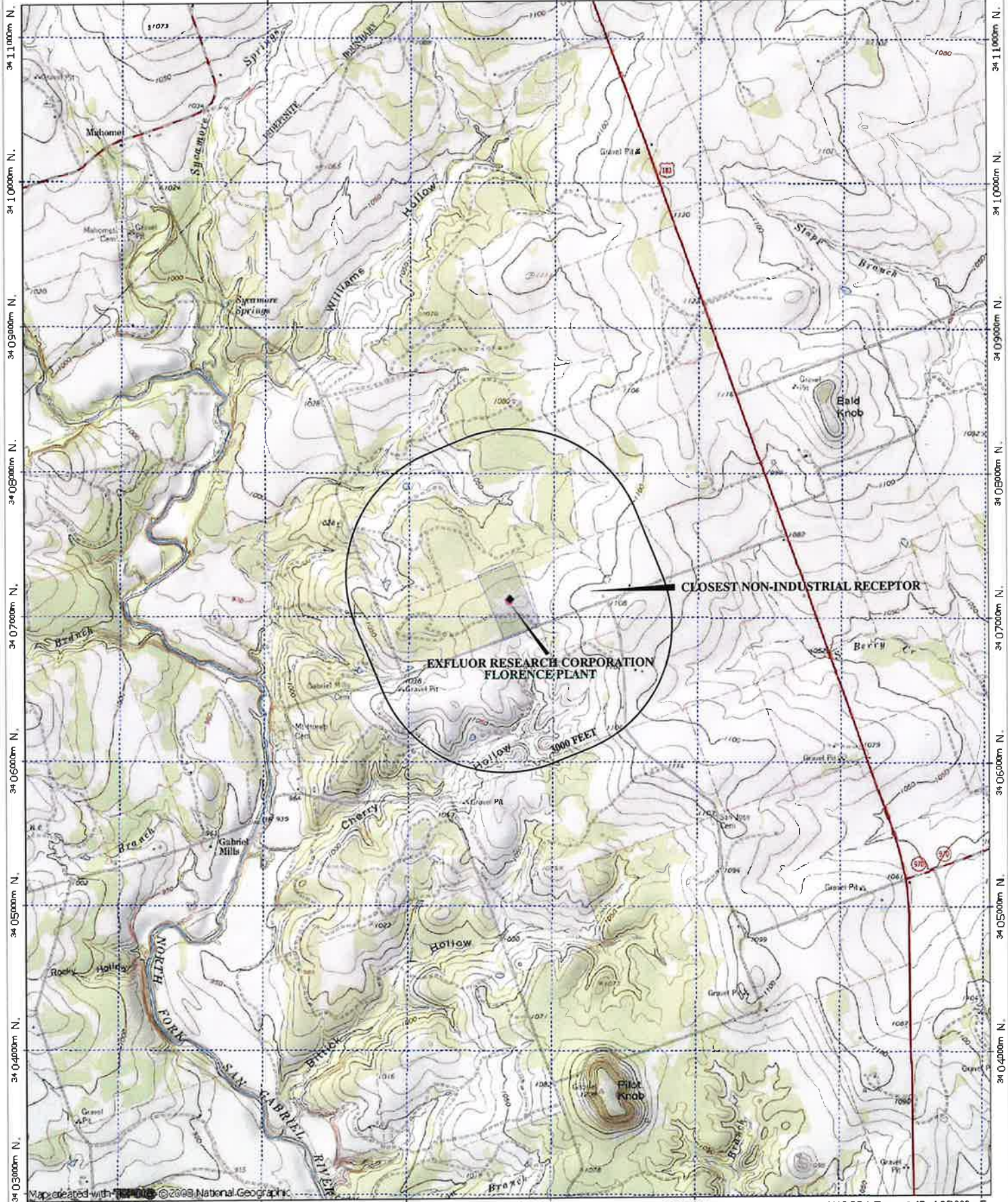
AREA MAP

The following area map provides an aerial view of the Florence Site and surrounding land-use. Identified in the following map are the plant's property boundaries, the closest non-industrial receptor, and a 3,000-ft radius from the plant.

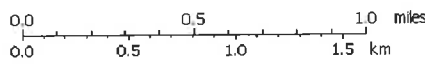
There are no schools located within 3,000 feet of the property line.

30°47'33" N, 97°54'21" W WGS84 1964 Mahomet, TX

602000m E. 603000m E. 604000m E. 605000m E. 606000m E. 607000m E.



34°03000m N. 34°04000m N. 34°05000m N. 34°06000m N. 34°07000m N. 34°08000m N. 34°09000m N. 34°10000m N. 34°11000m N.



WALD ENVIRONMENTAL
EXF14242MDLAREAMAP.DWG

TN MN
3 1/2°

Aerial Image

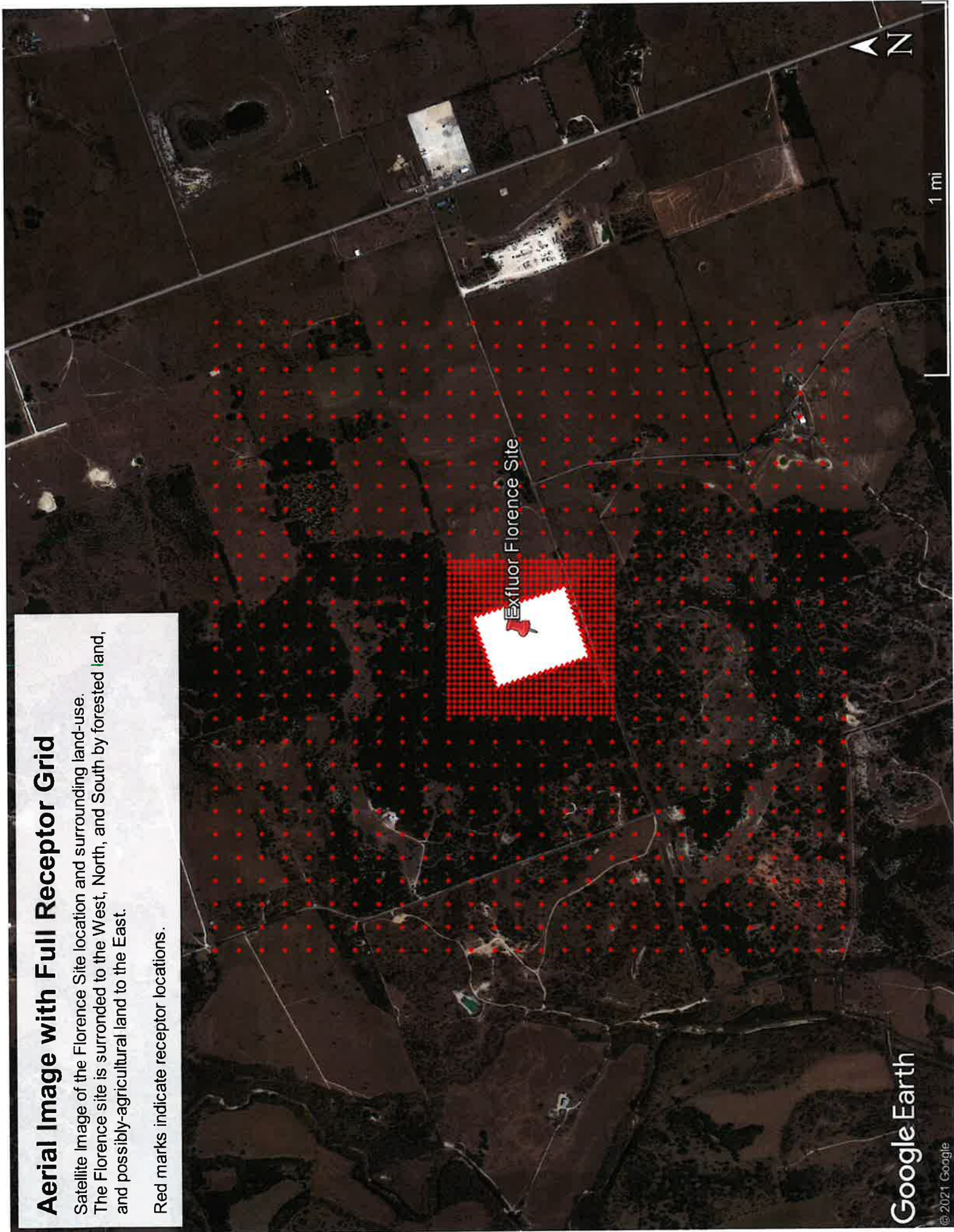
Satellite image of the Florence Site location and surrounding land-use. The Florence site is surrounded to the West, North, and South by forested land, and possibly-agricultural land to the East.



Aerial Image with Full Receptor Grid

Satellite image of the Florence Site location and surrounding land-use. The Florence site is surrounded to the West, North, and South by forested land, and possibly-agricultural land to the East.

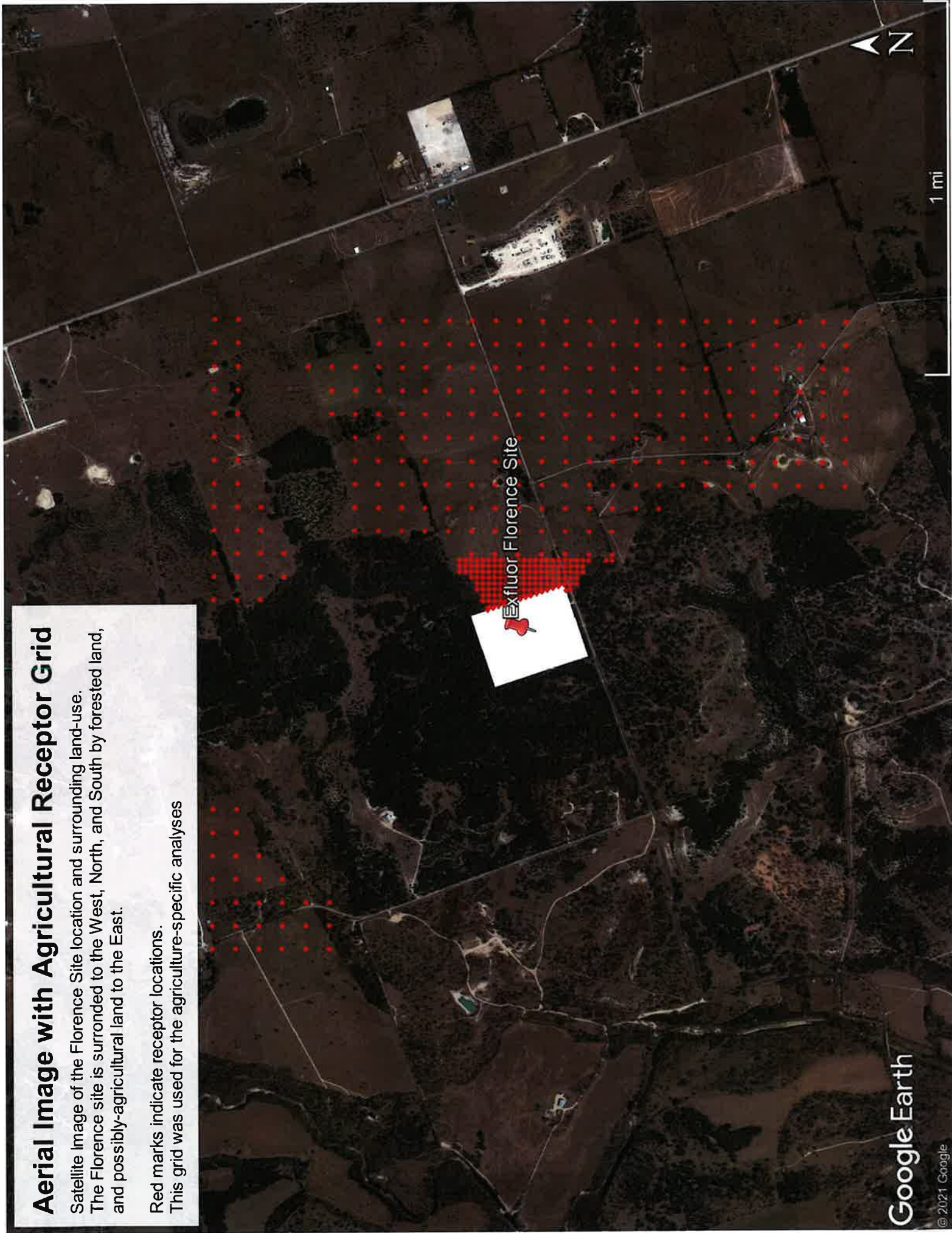
Red marks indicate receptor locations.



Aerial Image with Agricultural Receptor Grid

Satellite image of the Florence Site location and surrounding land-use. The Florence site is surrounded to the West, North, and South by forested land, and possibly-agricultural land to the East.

Red marks indicate receptor locations. This grid was used for the agriculture-specific analyses



SECTION 3.0

MODELING RESULTS

3.1 Evaluation Summary

The project proposes to authorize 170 unique chemicals emitted from ten sources. Of these 170 chemicals:

- Three of these are labeled 'Simple Asphyxiants' are listed on TCEQ's Toxicology Screening List in Appendix B of the MERA Guidance Document¹. This leaves 167 chemicals.
- Of these 167, two are known criteria pollutants (Nitrogen Oxides [NO_x] and Carbon Monoxide [CO]). Additionally, the project includes emissions of Butylated Hydroxytoluene, which are to be treated as particulate matter under 10 microns in diameter [PM₁₀] per Toxicology guidance. These three pollutants are analyzed following the minor NAAQS analysis framework. This leaves 164 non-criteria pollutants to be analyzed in the State Health Effects Analysis framework.
- Of these 164 non-criteria pollutants, 18 have an established effects screening level (ESL) available from TCEQ's TAMIS website². An additional 10 non-criteria pollutants have ESL values provided by the TCEQ Toxicology department in an email to Exflur Research Corporation in 2008. This leaves 136 pollutants without established ESLs.
- Following the MERA guidance document, these 136 pollutants are not included in the State Health Effects Analysis in this report.

3.2 Ambient Secondary PM_{2.5} Formation

This project proposes increases in annual emissions of NO_x, which is a precursor pollutant for atmospheric formation of PM_{2.5}. With the November 2019 release of the TCEQ Air Quality Modeling Guidelines, any project that proposes an increase in NO_x and/or SO₂ must evaluate secondary PM_{2.5} impacts.

This analysis uses EPA's Modeled Emission Rates for Precursor (MERP) Tier 1 approach to quantify the impact of secondary PM_{2.5} formed in the atmosphere from this project's proposed increases of NO_x and/or SO₂. The equation below outlines the procedure for this determination.

$$PM_{2.5} \text{ Secondary Concentration} = \left(\frac{NO_x ER}{NO_x MERP} + \frac{SO_2 ER}{SO_2 MERP} \right) * SIL$$

The worst-case MERP values were used for this report in lieu of justifying a less conservative option. The calculated values of PM_{2.5} formation for this project are:

Calculated Secondary Formation of PM_{2.5}

Precursor Pollutant	Project Increase	MERP Value		Secondary PM _{2.5} Formation (µg/m ³)	
		24-hour	Annual	24-hour	Annual
NO _x	0.20 tons/yr	2,649	10,397	<1E-4	<1E-4

1 <https://www.tceq.texas.gov/assets/public/permitting/air/Guidance/NewSourceReview/mera.pdf>

2 <https://www17.tceq.texas.gov/tamis/index.cfm?fuseaction=home.welcome>

3.3 Minor NAAQS Analysis – Preliminary Impacts Determination

The impacts of project proposed emissions of NO_x, CO, and Butylated Hydroxytoluene (surrogated as PM₁₀) are provided in the table below. All impacts are below the established significant impact levels. All of these impacts were determined through an impacts scaling exercise, which is included at the end of this section. This analysis also assumed a conservative 100% conversion of NO_x to NO₂.

This minor NAAQS analysis is now complete.

Preliminary Impacts Determination

Pollutant	Averaging Time	SIL (µg/m ³)	1-Yr Max (µg/m ³)	Impacts Below SIL?
CO	1-Hour	2000	9.62	TRUE
CO	8-Hour	500	2.75	TRUE
NO ₂	1-Hour	7.5	7.0	TRUE
NO ₂	Annual	1	0.13	TRUE
PM ₁₀	24-Hour	5	<1E-4	TRUE
PM _{2.5}	24-Hour	1.2	<1E-4	TRUE
PM _{2.5}	Annual	0.2	<1E-4	TRUE

Minor NAAQS Preliminary Impacts Determination

Modeled Rates for Emission Sources

Proposed Total Emission Rates per EPN

EPN	NOx		CO (lb/hr)	PM ₁₀ ¹ (lb/hr)
	(lb/hr)	(ton/yr)		
EP3-1	0.045	0.199	0.062	7.12E-09
EP3-2	-	-	-	-
EP3-3	-	-	-	-
EP3-4	-	-	-	-
EP3-5	-	-	-	-
FUG3-1	-	-	-	-
FUG3-2	-	-	-	-
FUG3-3	-	-	-	-
FUG3-4	-	-	-	-
FUG3-5	-	-	-	-

1: Emissions of Butylated Hydroxytoluene are treated as PM₁₀ per Toxicology ESL database.

AERMOD UIM Output

EPN	Unit Impact (µg/m ³)/(1 lb/hr)			
	1-hr	8-hr	24-hr	Annual
EP3-1	154.4	44.1	19.6	2.8

Preliminary Impacts Determination - Scaling Summary

Pollutant	Averaging Time	SIL (µg/m ³)	1-Yr Max (µg/m ³)	Impacts Below SIL?
CO	1-Hour	2000	9.62	TRUE
CO	8-Hour	500	2.75	TRUE
NO ₂	1-Hour	7.5	7.01	TRUE
NO ₂	Annual	1	0.13	TRUE
PM ₁₀	24-Hour	5	1.39E-07	TRUE

Sample Calculation:

$$\begin{aligned}
 \text{EP3-1 1-hour NO}_2 \text{ Impacts} &= \text{EP3-1 NO}_x \text{ Emissions} * \text{1-hour EP3-1 UIM} * \text{1:1 Ratio NO}_x/\text{NO}_2 \\
 &= 0.045 \text{ lbs/hr} * 154.37 \text{ µg/m}^3 \text{ per lb/hr} \\
 &= 7.009 \text{ µg/m}^3
 \end{aligned}$$

$$\begin{aligned}
 \text{EP3-1 Annual NO}_2 \text{ Impacts} &= \text{EP3-1 NO}_x \text{ Emissions} * \text{Annual EP3-1 UIM} * 2000/8760 * \text{1:1 Ratio NO}_x/\text{NO}_2 \\
 &= 0.199 \text{ lbs/hr} * 2.85 \text{ µg/m}^3 \text{ per lb/hr} * 2000/8760 \\
 &= 0.129 \text{ µg/m}^3
 \end{aligned}$$

3.4 State Health Effects Analysis

The TCEQ's MERA guidance document was used to determine the scope of modeling and effects review for the project allowable emissions increases of non-criteria pollutants. The 28 affected pollutants with established ESLs for this analysis are presented in the table below, along with their respective short-term and long-term ESLs (STESL, LTESL).

Non-Criteria Pollutants and Respective Effects Screening Levels

Pollutant Name	CAS No.	ESL Source	STESL (µg/m3)	LTESL (µg/m3)
Hydrogen Fluoride	7664-39-3	TAMIS	18.00	8.70
Hydrogen Fluoride (Agriculture)	7664-39-3	TAMIS	3.00	0.60
Hydrogen Fluoride (Agriculture with Cattle)	7664-39-3	TAMIS	n/a	0.75
Difluorine	7782-41-4	TAMIS	2.00	0.20
Carbonyl Fluoride	353-50-4	TAMIS	17.00	8.10
Carbonyl Fluoride (Agriculture)	353-50-4	TAMIS	2.80	0.57
Carbonyl Fluoride (Agriculture with Cattle)	353-50-4	TAMIS	n/a	0.71
Trifluoroacetic acid	76-05-1	TAMIS	17	8.1
Trifluoroacetic acid (Agriculture)	76-05-1	TAMIS	2.80	0.57
Trifluoroacetic acid (Agriculture with Cattle)	76-05-1	TAMIS	n/a	0.71
Perfluorohexane	355-42-0	TAMIS	10000	1000
Perfluoroheptane	335-57-9	TAMIS	200	20
Methanol	67-56-1	TAMIS	3900	2100
Isopropyl Alcohol	67-63-0	TAMIS	4920	492
Perfluorooctanoic acid	335-67-1	TAMIS	0.05	0.01
Bromine	7726-95-6	TAMIS	7.0	0.70
Toluene	108-88-3	TAMIS	4500.00	1200
Butylated Hydroxytoluene	128-37-0	TAMIS	Must Meet NAAQS	Must Meet NAAQS
Acrylic Acid	79-10-7	TAMIS	60	6
Hydrogen Chloride	7647-01-0	TAMIS	190	7.9
Ethyl acetate	141-78-6	TAMIS	3100	1440
1,1,2-Trichloro-1,2,2-trifluoroethane	76-13-1	TAMIS	38000	3800
Perfluoropropane	76-19-7	TAMIS	10000	1000
Carbon tetrafluoride	75-73-0	TAMIS	1800	1800
Tetrahydrofuran	109-99-9	TAMIS	1500	150
Hydrogen Bromide	10035-10-6	TAMIS	100	10
Acetyl Fluorides	354-34-7	2008 Email	200	20
Perfluorodecyl fluoride	594-98-9	2008 Email	200	20

Pollutant Name	CAS No.	ESL Source	STESL (µg/m3)	LTESL (µg/m3)
Perfluoro (bis-2-chloroethoxy methane)	130085-19-7	2008 Email	200	20
Perfluorooctane	307-34-6	2008 Email	20000	2000
Perfluorodecalin	306-94-5	2008 Email	200	20
Perfluoro-tert-butanol	2378-02-1	2008 Email	1000	100
Perfluorodecanoic acid	335-76-2	2008 Email	14	1.4
polymers of chlorotrifluoroethylene (PCTFE)	9002-83-9	2008 Email	1000	100
Perfluoro-t-butylcyclohexane	84808-64-0	2008 Email	200	20

The following steps detail the evaluation of these pollutants, and the chart at the end of this section presents the MERA analysis steps:

- Step 1:** Not Applicable. The net change in emissions for all pollutants was > 0. The evaluation proceeds to Step 2 for all other chemicals.
- Step 2:** The project proposed allowable emissions fall within the de minimis levels for the following pollutants: carbonyl fluoride, carbonyl fluoride for permitting in agricultural areas, Trifluoroacetic acid, Trifluoroacetic acid for permitting in agriculture areas, Perfluorohexane, Isopropyl Alcohol, Toluene, Acrylic Acid, Ethyl acetate, 1,1,2-Trichloro-1,2,2-trifluoroethane, Perfluoropropane, Tetrahydrofuran, Hydrogen Bromide, Acetyl Fluorides, Perfluorodecyl fluoride, Perfluorooctane, Perfluoro-tert-butanol, Perfluorodecanoic acid, and Perfluoro-t-butylcyclohexane. The evaluation is complete for these chemicals. For all other chemicals, the evaluation proceeds to Step 3.
- Step 3:** A unit impact scaling analysis was conducted on the proposed increases of all remaining pollutants. This unit impact analysis creates a conservatively high GLC_{MAX} value as the maximum concentration predicted is irrespective of time or space of an individual unit's impact. The results of this analysis step are included in the following table.
- The calculated hourly GLC_{MAX} concentrations (and annual GLC_{MAX} concentrations when required by the MERA guidelines) from this unit impact analysis are based on AERMOD modeling results. The concentrations presented are below 10% of the ST and LT ESLs for Methanol, Perfluorooctanoic acid, Hydrogen Chloride, Carbon tetrafluoride, and Perfluoro (bis-2-chloroethoxy methane). The health effects evaluation is therefore complete for these chemicals. The evaluation of the remaining chemicals proceeds to Step 4.
- Steps 4-6:** This analysis skips Steps 4-6 and proceeds straight to Step 7.
- Step 7:** This is an initial permit application for a new facility. Therefore, the proposed emission rates of this permit application represent the site-wide emission rates for these pollutants. The impacts determined from the Step 3 scaling analysis are now compared to the total ESL thresholds. When this conservative comparison is performed, the estimated impacts are below the total ESL

threshold for the following pollutants: Hydrogen Fluoride, Hydrogen Fluoride (Agriculture with Cattle), Carbonyl Fluoride (Agriculture with Cattle), Trifluoroacetic acid (Agriculture with Cattle), Perfluoroheptane, Bromine, Perfluorodecalin, and polymers of chlorotrifluoroethylene (PCTFE).

There are only two pollutants within this analysis whose impacts from the conservative UIM scaling approach do not fall under the respective ESLs. The remainder of this section discusses the pollutant-specific modeling performed and the resultant impacts.

Hydrogen Fluoride (for air permit reviews in agricultural areas)

Chemical-specific modeling was performed for the proposed emissions of Hydrogen Fluoride (HF) in agricultural areas. This respective ESL is only relevant in areas with agricultural processes. Exflur is unaware of any agricultural industry in the immediate vicinity of the proposed Florence Site, as most of the land appears to be uninhabited and undeveloped. However, to be conservative in this analysis, aerial satellite imagery of the surrounding lands was used to survey forested vs. non-forested land. All non-forested, non-road lands that fell within the original receptor grid footprint were considered potentially-agricultural. This includes the property immediately adjacent to the Florence Site's Eastern boundary. Using this agriculture-specific receptor grid, the following impacts were found for the proposed HF emissions.

Site-wide Modeling Results – Hydrogen Fluoride in Agricultural Areas

Description	GLC _{MAX}	GLC _{VINEYARD}
Concentration	3.86 µg/m ³	1.92 µg/m ³
UTM Location	604867.89, 3407174.21	605011.00, 3407134.00
Max Hours Above 1XESL	30 hours	0 hours
Max Hours Above 2XESL	0 hours	0 hours
Max Hours Above 4XESL	0 hours	0 hours

AERMOD output predicts the Agriculture-based ESL would be exceeded up to 30 hours per year. Aerial imagery and "street-view" imagery of the land east of the Florence Site indicates a small vineyard was recently established. This is identified on the plot included at the end of this section, and is also specifically called out in the table above. Impacts of HF are not expected to exceed the ESL at this vineyard.

As shown in the contour plot included at the end of this section, the ESL-exceeding impacts of HF are limited to <50 meters off-property along the Eastern edge of the Florence Site.

Difluorine

Chemical-specific modeling was performed for the proposed emissions of Difluorine. The table below provides the model-predicted impacts of this analysis. The full receptor grid was used for this analysis.

Site-wide Modeling Results – Difluorine

Description	GLC_{MAX}	GLC_{NI}
Concentration	3.88 µg/m ³	0.49 µg/m ³
UTM Location	604562.85, 3407070.82	605261.00, 3407184.00
Max Hours Above 1XESL	105 hours	0 hours
Max Hours Above 2XESL	0 hours	0 hours
Max Hours Above 4XESL	0 hours	0 hours

Impacts of Difluorine are expected to reach a maximum concentration at ground level of 3.88 µg/m³ along the Western property boundary of the Florence Site. The Western boundary is wooded and not developed and the chances of someone being exposed to these concentrations is very low. ESL-exceeding concentrations of Difluorine are expected to extend to all four sites of the property. As shown in the contour plot provided at the end of this section, the range of ESL-exceeding concentrations is limited to the close vicinity of the plant, and will not extend either to County Road 236 to the South of the Florence Site, nor out to any non-industrial structures.

Exflur Research Corporation believes that these impacts are acceptable given the remote location of this facility, and the limited spread of the pollutants' plumes. This health effects analysis is now complete.

State Health Effects Analysis
 TCEQ Modeling and Effects Review Analysis Logical Hierarchy (APDQ 5874) (March 2018)

Qualifying Information

Pollutant Name	Hydrogen Fluoride	Hydrogen Fluoride (Agriculture)	Hydrogen Fluoride (Agriculture with Cattle)	Difluorine
CAS No.	7664-39-3	7664-39-3	7664-39-3	7782-41-4
Short-Term ESL ($\mu\text{g}/\text{m}^3$)	18	3	n/a	2
Long-Term ESL ($\mu\text{g}/\text{m}^3$)	8.7	0.6	0.75	0.2
Net Change in Hourly Emissions (lb/hr)	0.134	0.134	0.134	0.103
Net Change in Annual Emissions (TPY)	0.588	0.588	0.588	0.453
Total Hourly project increases (increase-only) (lbs/hr)	0.134	0.134	0.134	0.103
Total Annual project increases (increase-only) (tons/yr)	0.588	0.588	0.588	0.453
Total Hourly PTE project production increases only (tons/hr)	0.134	0.134	0.134	0.103
Total Annual PTE project production increases only (tons/yr)	0.588	0.588	0.588	0.453
Total Hourly PTE project MSS increases (lbs/hr)	-	-	-	-
Total Annual PTE project MSS increases (tons/yr)	-	-	-	-

Modeling and Effects Review Applicability (MERA) Guideline Steps

	Hydrogen Fluoride	Hydrogen Fluoride (Agriculture)	Hydrogen Fluoride (Agriculture with Cattle)	Difluorine
1 Is the net change in emissions ≤ 0 ?	No	No	No	No
2 De Minimis Increase * Is the LTESL $\geq 10\%$ STESL? * Does this project involve MSS emission increases? * Do MSS emissions overlap with Routine Production Emissions? ** Are hourly P / PTE increases ≤ 0.04 lb/hr and STESL = [2, 500]? ** Are hourly Production / PTE increases ≤ 0.1 lb/hr and STESL = [500, 3500]? ** Are hourly Production / PTE increases ≤ 0.4 lb/hr and STESL ≥ 3500 ? *** Are hourly MSS increases ≤ 0.1 lb/hr and STESL = [2, 3500]? *** Are hourly MSS increases ≤ 0.4 lb/hr and STESL ≥ 3500 ?	Yes No No No No No -	No No No -	No No No No No -	Yes No No No No -
3 Summed Unit-Impact Concentration * 10% of Short-term ESL ($\mu\text{g}/\text{m}^3$) * Hourly GLC_{max} concentration ($\mu\text{g}/\text{m}^3$) (AERMOD UIM) * Is Hourly $\text{GLC}_{\text{max}} \leq 10\%$ STESL? * Is the LTESL $\geq 10\%$ STESL? * 10% of Long-term ESL ($\mu\text{g}/\text{m}^3$) * Max annual off-property concentration ($\mu\text{g}/\text{m}^3$) (AERMOD UIM) * Is Annual $\text{GLC}_{\text{max}} \leq 10\%$ STESL?	1.8 5.877 No -	0.3 4.027 No -	- - -	0.2 3.878 No -
7 Conduct Site-wide Modeling and submit Air Quality Analysis * Short-term ESL ($\mu\text{g}/\text{m}^3$) * Hourly GLC_{max} concentration ($\mu\text{g}/\text{m}^3$) (AERMOD UIM) * Is Hourly $\text{GLC}_{\text{max}} \leq \text{STESL}$? * Long-term ESL ($\mu\text{g}/\text{m}^3$) * Annual GLC_{max} concentration ($\mu\text{g}/\text{m}^3$) (AERMOD UIM) * Is Annual $\text{GLC}_{\text{max}} \leq \text{LTESL}$?	Pending 18 5.877 Yes - Step 8 -	Pending 3 4.027 No -	Pending -	Pending 2 3.878 No -
8 Scope of MERA evaluation is complete.	Complete	Complete	Complete	Complete

State Health Effects Analysis
 TCEQ Modeling and Effects Review Analysis Logical Hierarchy (APDG 5874) (March 2018)

Qualifying Information

Pollutant Name	Carbonyl Fluoride	Carbonyl Fluoride (Agriculture)	Carbonyl Fluoride (Agriculture with Cattle)	Trifluoroacetic acid
CAS No.	353-50-4	353-50-4	353-50-4	76-05-1
Short-Term ESL ($\mu\text{g}/\text{m}^3$)	17	2.8	n/a	17
Long-Term ESL ($\mu\text{g}/\text{m}^3$)	8.1	0.57	0.71	8.1
Net Change in Hourly Emissions (lb/hr)	0.012	0.012	0.012	0.014
Net Change in Annual Emissions (TPY)	0.053	0.053	0.053	0.061
Total Hourly project increases (increase-only) (lbs/hr)	0.012	0.012	0.012	0.014
Total Annual project increases (increase-only) (tons/yr)	0.053	0.053	0.053	0.061
Total Hourly PTE project production increases only (lbs/hr)	0.012	0.012	0.012	0.014
Total Annual PTE project production increases only (tons/yr)	0.053	0.053	0.053	0.061
Total Hourly PTE project MSS increases (lbs/hr)	-	-	-	-
Total Annual PTE project MSS increases (tons/yr)	-	-	-	-

Modeling and Effects Review Applicability (MERA) Guideline Steps

1	Is the net change in emissions ≤ 0 ?	No	No	No	No
2	De Minimis Increase * Is the LTESL $\geq 10\%$ STESL? * Does this project involve MSS emission increases? * Do MSS emissions overlap with Routine Production Emissions? ** Are hourly Production / PTE increases ≤ 0.04 lb/hr and STESL = [2, 5000]? ** Are hourly Production / PTE increases ≤ 0.1 lb/hr and STESL = [500, 3500]? ** Are hourly Production / PTE increases ≤ 0.4 lb/hr and STESL ≥ 3500 ? *** Are hourly MSS increases ≤ 0.1 lb/hr and STESL = [2, 3500]? *** Are hourly MSS increases ≤ 0.4 lb/hr and STESL ≥ 3500 ?	Yes No No Yes - Step 8	No Yes No No Yes - Step 8	No Yes No No Yes - Step 8	No Yes No No Yes - Step 8
3	Summed Unit-Impact Concentration * 10% of Short-term ESL ($\mu\text{g}/\text{m}^3$) * Hourly GLC_{max} concentration ($\mu\text{g}/\text{m}^3$) (AERMOD UIM) * Is Hourly $\text{GLC}_{\text{max}} \leq 10\%$ STESL? * Is the LTESL $\geq 10\%$ STESL? * 10% of Long-term ESL ($\mu\text{g}/\text{m}^3$) * Max annual off-property concentration ($\mu\text{g}/\text{m}^3$) (AERMOD UIM) * Is Annual $\text{GLC}_{\text{max}} \leq 10\%$ STESL?	- - - - -	- - - - -	- - - - -	- - - - -
7	Conduct Site-wide Modeling and submit Air Quality Analysis * Short-term ESL ($\mu\text{g}/\text{m}^3$) * Hourly GLC_{max} concentration ($\mu\text{g}/\text{m}^3$) (AERMOD UIM) * Is Hourly $\text{GLC}_{\text{max}} \leq \text{STESL}$? * Long-term ESL ($\mu\text{g}/\text{m}^3$) * Annual GLC_{max} concentration ($\mu\text{g}/\text{m}^3$) (AERMOD UIM) * Is Annual $\text{GLC}_{\text{max}} \leq \text{LTESL}$?	- - - - -	- - - - -	- - - - -	- - - - -
8	Scope of MERA evaluation is complete.	Complete	Complete	Complete	Complete

State Health Effects Analysis
 TCEQ Modeling and Effects Review Analysis Logical Hierarchy (APDG 5874) (March 2018)

Qualifying Information

Pollutant Name	Trifluoroacetic acid (Agriculture)	Trifluoroacetic acid (Agriculture with Cattle)	Perfluorohexane	Perfluoroheptane
CAS No.	76-05-1	76-05-1	355-42-0	335-57-9
Short-Term ESL ($\mu\text{g}/\text{m}^3$)	2.8	n/a	10000	200
Long-Term ESL ($\mu\text{g}/\text{m}^3$)	0.57	0.71	1000	20
Net Change in Hourly Emissions (lb/hr)	0.014	0.014	0.221	0.527
Net Change in Annual Emissions (TPY)	0.061	0.061	0.916	2.277
Total Hourly project increases (increase-only) (lbs/hr)	0.014	0.014	0.221	0.527
Total Annual project increases (increase-only) (tons/yr)	0.061	0.061	0.916	2.277
Total Hourly PTE project production increases only (lbs/hr)	0.014	0.014	0.221	0.527
Total Annual PTE project production increases only (tons/yr)	0.061	0.061	0.916	2.277
Total Hourly PTE project MSS increases (lbs/hr)	-	-	-	-
Total Annual PTE project MSS increases (tons/yr)	-	-	-	-

Modeling and Effects Review Applicability (MERA) Guideline Steps

1	Is the net change in emissions ≤ 0 ?	No	No	No	No
2	De Minimis Increase * Is the LTESL $\geq 10\%$ STESL? * Does this project involve MSS emission increases? * Do MSS emissions overlap with Routine Production Emissions? ** Are hourly Production / PTE increases ≤ 0.04 lb/hr and STESL = [2, 500]? ** Are hourly Production / PTE increases ≤ 0.1 lb/hr and STESL = [500, 3500]? ** Are hourly Production / PTE increases ≤ 0.4 lb/hr and STESL ≥ 3500 ? *** Are hourly MSS increases ≤ 0.1 lb/hr and STESL = [2, 3500]? *** Are hourly MSS increases ≤ 0.4 lb/hr and STESL ≥ 3500 ?	Yes No No Yes - Step 8	No Yes No No No No Yes - Step 8	No Yes No No No No No Yes - Step 8	No Yes No No No No No -
3	Summed Unit-Impact Concentration * 10% of Short-term ESL ($\mu\text{g}/\text{m}^3$) * Hourly GLC_{max} concentration ($\mu\text{g}/\text{m}^3$) (AERMOD UIM) * Is Hourly $\text{GLC}_{\text{max}} \leq 10\%$ STESL? * Is the LTESL $\geq 10\%$ STESL? * 10% of Long-term ESL ($\mu\text{g}/\text{m}^3$) * Max annual off-property concentration ($\mu\text{g}/\text{m}^3$) (AERMOD UIM) * Is Annual $\text{GLC}_{\text{max}} \leq 10\%$ STESL?	No Yes No Yes - Step 8	No No No No No No No - Annual Required 0.071 0.031	No No No No No No No - Annual Required 0.071 0.031	No 20 21.509 No Yes - Skip Annual -
7	Conduct Site-wide Modeling and submit Air Quality Analysis * Short-term ESL ($\mu\text{g}/\text{m}^3$) * Hourly GLC_{max} concentration ($\mu\text{g}/\text{m}^3$) (AERMOD UIM) * Is Hourly $\text{GLC}_{\text{max}} \leq \text{STESE}$? * Long-term ESL ($\mu\text{g}/\text{m}^3$) * Annual GLC_{max} concentration ($\mu\text{g}/\text{m}^3$) (AERMOD UIM) * Is Annual $\text{GLC}_{\text{max}} \leq \text{LTESL}$?	Complete	Complete	Complete	Pending 200 21.509 Yes - Step 8 -
8	Scope of MERA evaluation is complete.	Complete	Complete	Complete	Complete

State Health Effects Analysis
 TCEQ Modeling and Effects Review Analysis Logical Hierarchy (APDG 5874) (March 2018)

Qualifying Information

Pollutant Name	Methanol	Isopropyl Alcohol	Perfluorooctanoic acid	Bromine
CAS No.	67-56-1	67-63-0	335-67-1	7726-95-6
Short-Term ESL ($\mu\text{g}/\text{m}^3$)	3900	4920	0.05	7
Long-Term ESL ($\mu\text{g}/\text{m}^3$)	2100	492	0.005	0.7
Net Change in Hourly Emissions (lb/hr)	0.629	0.000	0.000	0.137
Net Change in Annual Emissions (TPY)	0.274	0.000	0.000	0.598
Total Hourly project increases (increase-only) (lbs/hr)	0.629	0.000	0.000	0.137
Total Annual project increases (increase-only) (tons/yr)	0.274	0.000	0.000	0.598
Total Hourly PTE project production increases only (tons/hr)	0.629	0.000	0.000	0.137
Total Annual PTE project production increases only (tons/yr)	0.274	0.000	0.000	0.598
Total Hourly PTE project MSS increases (lbs/hr)	-	-	-	-
Total Annual PTE project MSS increases (tons/yr)	-	-	-	-

Modeling and Effects Review Applicability (MERA) Guideline Steps

1	Is the net change in emissions ≤ 0 ?	No	No	No	No
2	De Minimis Increase * Is the LTESL $\geq 10\%$ STESL? * Does this project involve MSS emission increases? * Do MSS emissions overlap with Routine Production Emissions? ** Are hourly Production / PTE increases ≤ 0.04 lb/hr and STESL = [2, 5000]? ** Are hourly Production / PTE increases ≤ 0.1 lb/hr and STESL = [500, 35000]? ** Are hourly Production / PTE increases ≤ 0.4 lb/hr and STESL ≥ 35000 ? *** Are hourly MSS increases ≤ 0.1 lb/hr and STESL = [2, 35000]? *** Are hourly MSS increases ≤ 0.4 lb/hr and STESL ≥ 35000 ?	Yes No No No No No No	No Yes No No No No No	Yes No No No No No No	No Yes No No No No No
3	Summed Unit-Impact Concentration * 10% of Short-term ESL ($\mu\text{g}/\text{m}^3$) * Hourly GLC_{MAX} concentration ($\mu\text{g}/\text{m}^3$) (AERMOD UJM) * Is Hourly $\text{GLC}_{\text{MAX}} \leq 10\%$ STESL? * Is the LTESL $\geq 10\%$ STESL? * 10% of Long-term ESL ($\mu\text{g}/\text{m}^3$) * Max annual off-property concentration ($\mu\text{g}/\text{m}^3$) (AERMOD UJM) * Is Annual $\text{GLC}_{\text{MAX}} \leq 10\%$ STESL?	390 334,359 Yes - Step 8 Yes - Skip Annual	0.005 0.000 Yes - Step 8 Yes - Skip Annual	0.7 5,106 No Yes - Skip Annual	0.7 5,106 No Yes - Skip Annual
7	Conduct Site-wide Modeling and submit Air Quality Analysis * Short-term ESL ($\mu\text{g}/\text{m}^3$) * Hourly GLC_{MAX} concentration ($\mu\text{g}/\text{m}^3$) (AERMOD UJM) * Is Hourly $\text{GLC}_{\text{MAX}} \leq \text{STESL}$? * Long-term ESL ($\mu\text{g}/\text{m}^3$) * Annual GLC_{MAX} concentration ($\mu\text{g}/\text{m}^3$) (AERMOD UJM) * Is Annual $\text{GLC}_{\text{MAX}} \leq \text{LTESL}$?	- - - - -	- - - - -	- - - - -	- - - - -
8	Scope of MERA evaluation is complete.	Complete	Complete	Complete	Complete

State Health Effects Analysis
 TCEQ Modeling and Effects Review Analysis Logical Hierarchy (APDG 5874) (March 2018)

Qualifying Information

Pollutant Name	Toluene	Butylated Hydroxytoluene	Acrylic Acid	Hydrogen Chloride
CAS No.	108-88-3	128-37-0	79-10-7	7647-01-0
Short-Term ESL ($\mu\text{g}/\text{m}^3$)	4500	Must Meet NAAQS	60	190
Long-Term ESL ($\mu\text{g}/\text{m}^3$)	1200	Must Meet NAAQS	6	7.9
Net Change in Hourly Emissions (lb/hr)	0.000	0.000	0.000	0.037
Net Change in Annual Emissions (TPY)	0.000	0.000	0.000	0.152
Total Hourly project increases (increase-only) (lbs/hr)	0.000	0.000	0.000	0.037
Total Annual project increases (increase-only) (tons/yr)	0.000	0.000	0.000	0.152
Total Hourly PTE project production increases only (lbs/hr)	0.000	0.000	0.000	0.037
Total Annual PTE project production increases only (tons/yr)	0.000	0.000	0.000	0.037
Total Hourly PTE project MSS increases (lbs/hr)	0.000	0.000	0.000	0.152
Total Annual PTE project MSS increases (tons/yr)	-	-	-	-

Modeling and Effects Review Applicability (MERA) Guideline Steps

1	Is the net change in emissions ≤ 0 ?	No	No	No
2	De Minimis Increase * Is the LTESL $\geq 10\%$ STESL? * Does this project involve MSS emission increases? * Do MSS emissions overlap with Routine Production Emissions? ** Are hourly Production / PTE increases ≤ 0.04 lb/hr and STESL = [2, 5000]? ** Are hourly Production / PTE increases ≤ 0.1 lb/hr and STESL = [500, 3500]? ** Are hourly Production / PTE increases ≤ 0.4 lb/hr and STESL ≥ 3500 ? *** Are hourly MSS increases ≤ 0.1 lb/hr and STESL = [2, 3500]? *** Are hourly MSS increases ≤ 0.4 lb/hr and STESL ≥ 3500 ?	Yes No No No No	Yes No No Yes - Step 8	No No No No -
3	Summed Unit-Impact Concentration * 10% of Short-term ESL ($\mu\text{g}/\text{m}^3$) * Hourly GLC_{max} concentration ($\mu\text{g}/\text{m}^3$) (AERMOD UJM) * Is Hourly $\text{GLC}_{\text{max}} \leq 10\%$ STESL? * Is the LTESL $\geq 10\%$ STESL? * 10% of Long-term ESL ($\mu\text{g}/\text{m}^3$) * Max annual off-property concentration ($\mu\text{g}/\text{m}^3$) (AERMOD UJM) * Is Annual $\text{GLC}_{\text{max}} \leq 10\%$ STESL?	Complete	Complete	19 4.323 Yes - Step 8 No - Annual Required 0.79 0.114
7	Conduct Site-wide Modeling and submit Air Quality Analysis * Short-term ESL ($\mu\text{g}/\text{m}^3$) * Hourly GLC_{max} concentration ($\mu\text{g}/\text{m}^3$) (AERMOD UJM) * Is Hourly $\text{GLC}_{\text{max}} \leq 10\%$ STESL? * Long-term ESL ($\mu\text{g}/\text{m}^3$) * Annual GLC_{max} concentration ($\mu\text{g}/\text{m}^3$) (AERMOD UJM) * Is Annual $\text{GLC}_{\text{max}} \leq 10\%$ STESL?	Complete	Complete	Complete
8	Scope of MERA evaluation is complete.	Complete	Complete	Complete

State Health Effects Analysis
 TCEQ Modeling and Effects Review Analysis Logical Hierarchy (APDG 5874) (March 2018)

Qualifying Information

Pollutant Name	Ethyl acetate	1,1,2-Trichloro-1,2,2-trifluoroethane	Perfluoropropane	Carbon tetrafluoride
CAS No.	141-78-6	76-13-1	76-19-7	75-73-0
Short-Term ESL ($\mu\text{g}/\text{m}^3$)	3100	38000	10000	18000
Long-Term ESL ($\mu\text{g}/\text{m}^3$)	1440	3800	1000	1800
Net Change in Hourly Emissions (lb/hr)	0.009	0.045	0.045	0.994
Net Change in Annual Emissions (TPY)	0.036	0.197	0.197	4.354
Total Hourly project increases (increase-only) (lbs/hr)	0.009	0.045	0.045	0.994
Total Annual project increases (increase-only) (tons/yr)	0.036	0.197	0.197	4.354
Total Hourly PTE project production increases only (lbs/hr)	0.009	0.045	0.045	0.994
Total Annual PTE project production increases only (tons/yr)	0.036	0.197	0.197	4.354
Total Hourly PTE project MSS increases (lbs/hr)	-	-	-	-
Total Annual PTE project MSS increases (tons/yr)	-	-	-	-

Modeling and Effects Review Applicability (MERA) Guideline Steps

1	Is the net change in emissions ≤ 0 ?	No	No	No	No
2	De Minimis Increase * Is the LTESL $\geq 10\%$ STESL? * Does this project involve MSS emission increases? * Do MSS emissions overlap with Routine Production Emissions? ** Are hourly Production / PTE increases ≤ 0.04 lb/hr and STESL = [2, 5000]? ** Are hourly Production / PTE increases ≤ 0.1 lb/hr and STESL = [500, 35000]? ** Are hourly Production / PTE increases ≤ 0.4 lb/hr and STESL ≥ 35000 ? *** Are hourly MSS increases ≤ 0.1 lb/hr and STESL = [2, 35000]? *** Are hourly MSS increases ≤ 0.4 lb/hr and STESL ≥ 35000 ?	No Yes No No No No Yes - Step 8	No Yes No No No No Yes - Step 8	No Yes No No No No Yes - Step 8	No Yes No No No No -
3	Summed Unit-Impact Concentration * 10% of Short-term ESL ($\mu\text{g}/\text{m}^3$) * Hourly GLC_{MAX} concentration ($\mu\text{g}/\text{m}^3$) (AERMOD UJM) * Is Hourly $\text{GLC}_{\text{MAX}} \leq 10\%$ STESL? * Is the LTESL $\geq 10\%$ STESL? * 10% of Long-term ESL ($\mu\text{g}/\text{m}^3$) * Max annual off-property concentration ($\mu\text{g}/\text{m}^3$) (AERMOD UJM) * Is Annual $\text{GLC}_{\text{MAX}} \leq 10\%$ STESL?	-	-	-	1800 153.447 Yes - Step 6 Yes - Skip Annual
7	Conduct Site-wide Modeling and submit Air Quality Analysis * Short-term ESL ($\mu\text{g}/\text{m}^3$) * Hourly GLC_{MAX} concentration ($\mu\text{g}/\text{m}^3$) (AERMOD UJM) * Is Hourly $\text{GLC}_{\text{MAX}} \leq \text{STESL}$? * Long-term ESL ($\mu\text{g}/\text{m}^3$) * Annual GLC_{MAX} concentration ($\mu\text{g}/\text{m}^3$) (AERMOD UJM) * Is Annual $\text{GLC}_{\text{MAX}} \leq \text{LTESL}$?	-	-	-	-
8	Scope of MERA evaluation is complete.	Complete	Complete	Complete	Complete

State Health Effects Analysis
 TCEQ Modeling and Effects Review Analysis Logical Hierarchy (APDG 5874) (March 2018)

Qualifying Information

Pollutant Name	Tetrahydrofuran	Hydrogen Bromide	Acetyl Fluorides	Perfluorodecyl Fluoride
CAS No.	109-99-9	10035-10-6	354-34-7	594-98-9
Short-Term ESL ($\mu\text{g}/\text{m}^3$)	1500	100	200	200
Long-Term ESL ($\mu\text{g}/\text{m}^3$)	150	10	20	20
Net Change in Hourly Emissions (lb/hr)	0.074	0.000	0.012	0.016
Net Change in Annual Emissions (TPY)	0.325	0.000	0.052	0.068
Total Hourly project increases (increase-only) (lbs/hr)	0.074	0.000	0.012	0.016
Total Annual project increases (increase-only) (tons/yr)	0.325	0.000	0.052	0.068
Total Hourly PTE project production increases only (lbs/hr)	0.074	0.000	0.012	0.016
Total Annual PTE project production increases only (tons/yr)	0.325	0.000	0.052	0.068
Total Hourly PTE project MSS increases (lbs/hr)	-	-	-	-
Total Annual PTE project MSS increases (tons/yr)	-	-	-	-

Modeling and Effects Review Applicability (MERA) Guideline Steps

1	Is the net change in emissions ≤ 0 ?	No	No	No	No
2	De Minimis Increase * Is the LTESL $\geq 10\%$ STESL? * Does this project involve MSS emission increases? * Do MSS emissions overlap with Routine Production Emissions? ** Are hourly Production / PTE increases ≤ 0.04 lb/hr and STESL = [2, 5000]? ** Are hourly Production / PTE increases ≤ 0.1 lb/hr and STESL = [500, 3500]? ** Are hourly Production / PTE increases ≤ 0.4 lb/hr and STESL ≥ 35000 ? *** Are hourly MSS increases ≤ 0.1 lb/hr and STESL = [2, 3500]? *** Are hourly MSS increases ≤ 0.4 lb/hr and STESL ≥ 35000 ?	Yes No No No	Yes No No	Yes No No	Yes No No
3	Summed Unit-Impact Concentration * 10% of Short-term ESL ($\mu\text{g}/\text{m}^3$) * Hourly GLC_{max} concentration ($\mu\text{g}/\text{m}^3$) (AERMOD UIM) * Is Hourly $\text{GLC}_{\text{max}} \leq 10\%$ STESL? * Is the LTESL $\geq 10\%$ STESL? * 10% of Long-term ESL ($\mu\text{g}/\text{m}^3$) * Max annual off-property concentration ($\mu\text{g}/\text{m}^3$) (AERMOD UIM) * Is Annual $\text{GLC}_{\text{max}} \leq 10\%$ STESL?	Yes - Step 8	Yes - Step 8	Yes - Step 8	Yes - Step 8
7	Conduct Site-wide Modeling and submit Air Quality Analysis * Short-term ESL ($\mu\text{g}/\text{m}^3$) * Hourly GLC_{max} concentration ($\mu\text{g}/\text{m}^3$) (AERMOD UIM) * Is Hourly $\text{GLC}_{\text{max}} \leq \text{STESL}$? * Long-term ESL ($\mu\text{g}/\text{m}^3$) * Annual GLC_{max} concentration ($\mu\text{g}/\text{m}^3$) (AERMOD UIM) * Is Annual $\text{GLC}_{\text{max}} \leq \text{LTESL}$?	Complete	Complete	Complete	Complete
8	Scope of MERA evaluation is complete.	Complete	Complete	Complete	Complete

EXFLUOR RESEARCH CORPORATION
INITIAL PERMIT APPLICATION FOR FLORENCE SITE
AIR QUALITY ANALYSIS

JULY 2021

State Health Effects Analysis
TCEQ Modeling and Effects Review Analysis Logical Hierarchy (APDG 5874) (March 2018)

Qualifying Information

Pollutant Name	Perfluoro (bis-2-chloroethoxy methane)	Perfluorooctane	Perfluorodecalin	Perfluoro-tert-butanol
CAS No.	130085-19-7	307-34-6	306-94-5	2378-02-1
Short-Term ESL ($\mu\text{g}/\text{m}^3$)	200	20000	200	1000
Long-Term ESL ($\mu\text{g}/\text{m}^3$)	20	2000	20	100
Net Change in Hourly Emissions (lb/hr)	0.132	0.393	0.546	0.001
Net Change in Annual Emissions (TPY)	0.561	1,705	2,387	0.000
Total Hourly project increases (increase-only) (lbs/hr)	0.132	0.393	0.546	0.001
Total Annual project increases (increase-only) (tons/yr)	0.561	1,705	2,387	0.000
Total Annual PTE project production increases only (lbs/hr)	0.132	0.393	0.546	0.001
Total Annual PTE project production increases only (tons/yr)	0.561	1,705	2,387	0.000
Total Annual PTE project MSS increases (lbs/hr)	-	-	-	-
Total Annual PTE project MSS increases (tons/yr)	-	-	-	-

Modeling and Effects Review Applicability (MERA) Guideline Steps

1	Is the net change in emissions ≤ 0 ?	No	No	No
2	De Minimis Increase * Is the LTESL $\geq 10\%$ STESL? * Does this project involve MSS emission increases? * Do MSS emissions overlap with Routine Production Emissions? ** Are hourly Production / PTE increases ≤ 0.04 lb/hr and STESL = [2, 500]? ** Are hourly Production / PTE increases ≤ 0.1 lb/hr and STESL = [500, 3500]? ** Are hourly Production / PTE increases ≤ 0.4 lb/hr and STESL ≥ 3500 ? *** Are hourly MSS increases ≤ 0.1 lb/hr and STESL = [2, 3500]? *** Are hourly MSS increases ≤ 0.4 lb/hr and STESL ≥ 3500 ?	Yes No No No No No	No Yes No No No No No No	No Yes No No No No No No Yes - Step 8
3	Summed Unit-Impact Concentration * 10% of Short-term ESL ($\mu\text{g}/\text{m}^3$) * Hourly GLC_{MAX} concentration ($\mu\text{g}/\text{m}^3$) (AERMOD UJM) * Is Hourly $\text{GLC}_{\text{MAX}} \leq 10\%$ STESL? * Is the LTESL $\geq 10\%$ STESL? * 10% of Long-term ESL ($\mu\text{g}/\text{m}^3$) * Max annual off-property concentration ($\mu\text{g}/\text{m}^3$) (AERMOD UJM) * Is Annual $\text{GLC}_{\text{MAX}} \leq 10\%$ STESL?	20 6,973 Yes - Step 8 Yes - Skip Annual - - -	20 21,649 No Yes - Skip Annual - - -	20 21,649 No Yes - Skip Annual - - -
7	Conduct Site-wide Modeling and submit Air Quality Analysis * Short-term ESL ($\mu\text{g}/\text{m}^3$) * Hourly GLC_{MAX} concentration ($\mu\text{g}/\text{m}^3$) (AERMOD UJM) * Is Hourly $\text{GLC}_{\text{MAX}} \leq \text{STEsl}$? * Long-term ESL ($\mu\text{g}/\text{m}^3$) * Annual GLC_{MAX} concentration ($\mu\text{g}/\text{m}^3$) (AERMOD UJM) * Is Annual $\text{GLC}_{\text{MAX}} \leq \text{LTEsl}$?	- - - - - -	- - - - - -	- - - - - -
8	Scope of MERA evaluation is complete.	Complete	Complete	Complete

EXFLUOR RESEARCH CORPORATION
 INITIAL PERMIT APPLICATION FOR FLORENCE SITE
 AIR QUALITY ANALYSIS

JULY 2021

State Health Effects Analysis
 TCEQ Modeling and Effects Review Analysis Logical Hierarchy (APDG 5874) (March 2018)

Qualifying Information

Pollutant Name	Perfluorodecanoic acid	polymers of chlorotrifluoroethylene (PCTFE)	Perfluoro-t-butylcyclohexane
CAS No.	335-76-2	9002-93-9	84808-64-0
Short-Term ESL ($\mu\text{g}/\text{m}^3$)	14	1000	200
Long-Term ESL ($\mu\text{g}/\text{m}^3$)	1.4	100	20.0
Net Change in Hourly Emissions (lb/hr)	0.000	0.314	0.003
Net Change in Annual Emissions (TPY)	0.000	0.143	0.013
Total Hourly project increases (increase-only) (lbs/hr)	0.000	0.314	0.003
Total Annual project increases (increase-only) (tons/yr)	0.000	0.143	0.013
Total Hourly PTE project production increases only (lbs/hr)	0.000	0.314	0.003
Total Annual PTE project production increases only (tons/yr)	0.000	0.143	0.013
Total Hourly PTE project MSS increases (lbs/hr)	-	-	-
Total Annual PTE project MSS increases (tons/yr)	-	-	-

Modeling and Effects Review Applicability (MERA) Guideline Steps

1	Is the net change in emissions ≤ 0 ?	No	No	No
2	De Minimis Increase <ul style="list-style-type: none"> * Is the LTESL $\geq 10\%$ STESL? * Does this project involve MSS emission increases? * Do MSS emissions overlap with Routine Production Emissions? ** Are hourly Production / PTE increases ≤ 0.04 lb/hr and STESL = [2, 5000]? ** Are hourly Production / PTE increases ≤ 0.1 lb/hr and STESL = [500, 35000]? ** Are hourly Production / PTE increases ≤ 0.4 lb/hr and STESL ≥ 35000? *** Are hourly MSS increases ≤ 0.1 lb/hr and STESL = [2, 35000]? *** Are hourly MSS increases ≤ 0.4 lb/hr and STESL ≥ 35000? 	Yes No No Yes - Step 8	Yes No No No No -	Yes No No Yes - Step 8
3	Summed Unit-Impact Concentration <ul style="list-style-type: none"> * 10% of Short-term ESL ($\mu\text{g}/\text{m}^3$) * Hourly GLC_{max} concentration ($\mu\text{g}/\text{m}^3$) (AERMOD UJM) * Is Hourly $\text{GLC}_{\text{max}} \leq 10\%$ STESL? * Is the LTESL $\geq 10\%$ STESL? * 10% of Long-term ESL ($\mu\text{g}/\text{m}^3$) * Max annual off-property concentration ($\mu\text{g}/\text{m}^3$) (AERMOD UJM) * Is Annual $\text{GLC}_{\text{max}} \leq 10\%$ STESL? 	-	100 169.526 No Yes - Skip Annual	-
7	Conduct Site-wide Modeling and submit Air Quality Analysis <ul style="list-style-type: none"> * Short-term ESL ($\mu\text{g}/\text{m}^3$) * Hourly GLC_{max} concentration ($\mu\text{g}/\text{m}^3$) (AERMOD UJM) * Is Hourly $\text{GLC}_{\text{max}} \leq \text{STESL}$? * Long-term ESL ($\mu\text{g}/\text{m}^3$) * Annual GLC_{max} concentration ($\mu\text{g}/\text{m}^3$) (AERMOD UJM) * Is Annual $\text{GLC}_{\text{max}} \leq \text{LTESL}$? 	-	Pending 1000 169.526 Yes - Step 8	-
8	Scope of MERA evaluation is complete.	Complete	Complete	Complete

Health Effects Analysis - MERA Step 3 & Step 7
Determining Conservative Impact with Unit Impact Scaling

Scaled Impact Determination Sample Calculation

Hourly Hydrogen Fluoride Impact of EPN EP3-1
 = Unit Impact EP3-1 ($\mu\text{g}/\text{m}^3$) / (lb/hr) * EP3-1 Hourly HF ER (lb/hr)
 = $154.37366 (\mu\text{g}/\text{m}^3) / (\text{lb}/\text{hr}) * 0.01$
 = $1.14 \mu\text{g}/\text{m}^3$

	1-hour UIM ($\mu\text{g}/\text{m}^3$) / (lb/hr)						
	EP3-1	EP3-2	EP3-3	FUG3-1	FUG3-2	FUG3-3	FUG3-4
Full Grid	154.37	56.87	57.54	37.36	57.59	55.58	58.87
Ag Grid	120.14	24.42	24.34	24.76	26.27	24.92	26.10

AERMOD Predicted Impacts ($\mu\text{g}/\text{m}^3$) - Scaled Hourly Impact

Non-Criteria Pollutant	Short-Term ESL ($\mu\text{g}/\text{m}^3$)	Hourly Impact ($\mu\text{g}/\text{m}^3$)						Short-Term Total	Impact Exceeds ESL?
		EP3-1	EP3-2	EP3-3	FUG3-1	FUG3-2	FUG3-3		
Hydrogen Fluoride	18.00	1.14	-	-	4.74	-	-	5.88	FALSE
Hydrogen Fluoride (Agriculture)	3.00	0.89	-	-	3.14	-	-	4.03	See Chemical Specific Modeling
Hydrogen Fluoride (Agriculture with Cattle)	n/a								
Difluorine	2.00	0.02	-	-	3.86	-	-	3.88	See Chemical Specific Modeling
Carbonyl Fluoride (Agriculture with Cattle)	n/a								
Trifluoroacetic acid (Agriculture with Cattle)	n/a								
Perfluoroheptane	200.00	2.42	-	-	19.09	-	-	21.51	FALSE
Methanol	3900.00	4.31	13.36	18.49	1.68	-	-	37.84	FALSE
Perfluorooctanoic acid	0.05	0.00	-	-	-	-	-	0.00	FALSE
Bromine	7.00	0.00	-	-	5.10	-	-	5.11	FALSE
Hydrogen Chloride	190.00	3.51	-	-	-	0.43	0.20	4.32	FALSE
Carbon tetrafluoride	18000.00	153.45	-	-	-	-	-	153.45	FALSE
Perfluoro (bis-2-chloroethoxy methane)	200.00	2.68	-	-	4.29	-	-	6.97	FALSE
Perfluorodecalin	200.00	1.64	-	-	20.01	-	-	21.65	FALSE
polymers of chlorotrifluoroethylene (PCTFE)	1000.00	0.05	6.76	9.58	1.05	-	-	17.44	FALSE

Health Effects Analysis - MERA Step 3 & Step 7
 Determining Conservative Impact with Unit Impact Scaling

Scaled Impact Determination Sample Calculation

Annual Hydrogen Fluoride Impact of EPN EP3-1
 = Unit Impact EP3-1 ($\mu\text{g}/\text{m}^3$) / (lb/hr) * EP3-1 Annual Phenol ER (tons/yr) * 2000 lbs/ton / 8760 hrs/yr
 = 2.84758 ($\mu\text{g}/\text{m}^3$) / (lb/hr) * 0.052 / 4.38
 = 0.03 $\mu\text{g}/\text{m}^3$

	Annual UIM ($\mu\text{g}/\text{m}^3$) / (lb/hr)							
	EP3-1	EP3-2	EP3-3	EP3-1	FUG3-1	FUG3-2	FUG3-3	FUG3-4
Full Grid	2.85	4.06	4.10	2.92	3.86	3.93	3.98	3.98
Ag Grid	2.23	1.65	1.64	1.99	1.71	1.68	1.68	1.68


AERMOD Predicted Impacts ($\mu\text{g}/\text{m}^3$) - Scaled Annual Impact


Non-Criteria Pollutant	Long-Term ESL ($\mu\text{g}/\text{m}^3$)	Annual Impact ($\mu\text{g}/\text{m}^3$)								Long-Term Total	Impact Exceeds ESL?	
		EP3-1	EP3-2	EP3-3	FUG3-1	FUG3-2	FUG3-3	FUG3-4	FUG3-4			
Hydrogen Fluoride	8.70	-	-	-	-	-	-	-	-	-	-	-
Hydrogen Fluoride (Agriculture)	0.60	-	-	-	-	-	-	-	-	-	-	-
Hydrogen Fluoride (Agriculture with Cattle)	0.75	0.02	-	-	0.25	-	-	-	-	0.27	-	FALSE
Difluorine	0.20	-	-	-	-	-	-	-	-	-	-	-
Carbonyl Fluoride (Agriculture with Cattle)	0.71	0.03	-	-	-	-	-	-	-	0.03	-	FALSE
Trifluoroacetic acid (Agriculture with Cattle)	0.71	0.03	-	-	-	-	-	-	-	0.03	-	FALSE
Perfluoroheptane	20.00	-	-	-	-	-	-	-	-	-	-	-
Methanol	2100.00	-	-	-	-	-	-	-	-	-	-	-
Perfluorooctanoic acid	0.01	-	-	-	-	-	-	-	-	-	-	-
Bromine	0.70	-	-	-	-	-	-	-	-	-	-	-
Hydrogen Chloride	7.90	0.06	-	-	-	0.03	0.01	0.01	0.01	0.11	-	FALSE
Carbon tetrafluoride	1800.00	-	-	-	-	-	-	-	-	-	-	-
Perfluoro (bis-2-chloroethoxy methane)	20.00	-	-	-	-	-	-	-	-	-	-	-
Perfluorodecalin	20.00	-	-	-	-	-	-	-	-	-	-	-
polymers of chlorotrifluoroethylene (PCTFE)	100.00	-	-	-	-	-	-	-	-	-	-	-

Impacts of Hydrogen Fluoride in Agricultural Areas

The contours in this plot represent predicted concentrations at or above the representative ESL threshold.

Legend

 3 ug/m3

 Exfluor Florence Site

HF Ag - GLCmax
3.46

Vineyard

Non-Industrial Receptor

Exfluor Facility



600 ft

Impacts of Difluorine

The contours in this plot represent predicted concentrations at or above the representative ESL threshold.

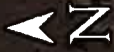
Legend

- 2 ug/m3
- 3 ug/m3
- Exfluor Florence Site



Non-Industrial Receptor

Difluorine - GLCmax



1000 ft

SECTION 4.0

ELECTRONIC INFORMATION

Model input/output and associated computer or electronic files will be shared via the TCEQ's FTP site concurrently with the submittal of this analysis document. The guide below provides an overview of the contents and organization of this shared directory.

File or Folder Name	Description
01 – Model Output	This directory contains the AERMOD modeling input/output files.
02 – Meteorology	This directory contains the meteorological input files downloaded from the TCEQ's website and used in these analyses.
03 – Receptors	This directory contains the receptor grids used for these modeling analyses
04 – AERSURFACE	This directory contains the AERSURFACE output files, containing the surface roughness value for the project site.
05 – Terrain Elevation	This directory contains the land elevation files used to determine base elevation of each receptor, emission point, and downwash structure.
06 – Downwash	This directory contains the BPIP input and output files for determining downwash factors for each point source.
07 – Plots and Maps	This directory contains the plot plan, area map, and contour plots of HF and Difluorine impacts.

APPENDIX

EMISSIONS SUMMARY TABLES AND MODELED RELEASE PARAMETERS

PROPOSED EMISSIONS FOR FLORENCE SITE

Pollutant	CAS	ESL Source	Short-Term ESL (µg/m3)	Long-Term ESL (µg/m3)	EP3-1		EP3-2	
					(lbs/hr)	(tons/yr)	(lbs/hr)	(tons/yr)
Hydrogen Fluoride	7664-39-3	TAMIS	18.00	8.70	7.4E-03	0.03	-	-
Hydrogen Fluoride (Agriculture)	7664-39-3	TAMIS	3.00	0.60	7.4E-03	0.03	-	-
Hydrogen Fluoride (Agriculture with Cattle)	7664-39-3	TAMIS	n/a	0.75	7.4E-03	0.03	-	-
Difluorine	7782-41-4	TAMIS	2.00	0.20	1.1E-04	5.0E-04	-	-
Carbonyl Fluoride	353-50-4	TAMIS	17.00	8.10	0.01	0.05	-	-
Carbonyl Fluoride (Agriculture)	353-50-4	TAMIS	2.80	0.57	0.01	0.05	-	-
Carbonyl Fluoride (Agriculture with Cattle)	353-50-4	TAMIS	n/a	0.71	0.01	0.05	-	-
Acetyl Fluorides	354-34-7	2008 Email	200.00	20.00	0.01	0.05	-	-
Trifluoroacetic acid	76-05-1	TAMIS	17.00	8.10	0.01	0.06	-	-
Trifluoroacetic acid (Agriculture)	76-05-1	TAMIS	2.80	0.57	0.01	0.06	-	-
Trifluoroacetic acid (Agriculture with Cattle)	76-05-1	TAMIS	n/a	0.71	0.01	0.06	-	-
Perfluoropentanoyl fluoride	375-62-2	-	-	-	0.02	0.04	-	-
Perfluorohexanoyl fluoride	355-38-4	-	-	-	0.02	0.04	-	-
Perfluoroheptanoyl fluoride	375-84-8	-	-	-	0.01	0.04	-	-
Perfluorooctanoyl fluoride	335-66-0	-	-	-	0.01	0.04	-	-
Perfluorononanoyl fluoride	558-95-2	-	-	-	0.01	0.04	-	-
Perfluorodecyl fluoride	594-98-9	2008 Email	200.00	20.00	0.01	0.04	-	-
Perfluorosuccinoyl fluoride	679-13-0	-	-	-	0.03	0.05	-	-
Hexafluoroglutaroyl fluoride	678-78-4	-	-	-	0.02	0.05	-	-
Octafluoroadipoyl fluoride	37881-62-2	-	-	-	0.02	0.05	-	-
Perfluorosuberoyl fluoride	24647-09-4	-	-	-	0.01	0.05	-	-
Perfluorosebacoyl fluoride	-	-	-	-	0.01	0.04	-	-
Perfluorobutoxyethoxyacetyl fluoride	172897-75-5	-	-	-	0.01	0.05	-	-
Perfluorotriglycoyl Fluoride	24647-19-6	-	-	-	0.02	0.05	-	-
Perfluoro-3,6,9-Trioxatridecanoyl Fluoride	883733-06-0	-	-	-	0.01	0.05	-	-
Perfluorotetraglycoyl Fluoride	24689-56-3	-	-	-	0.01	0.05	-	-
Perfluoro-3,6,9-trioxatridecanoic acid	330562-41-9	-	-	-	0.01	0.05	-	-
Perfluoropolyethylene Glycol Glycoyl fluoride	-	-	-	-	0.01	0.05	-	-
Perfluoropolytrimethylene acyl fluoride	-	-	-	-	1.2E-05	6.0E-08	-	-
Perfluoropolytetramethylene acyl fluoride	-	-	-	-	1.2E-05	6.0E-08	-	-
Perfluoropolydioxolane diacyl fluoride	-	-	-	-	1.2E-05	6.1E-08	-	-
Perfluorocyclohexyl carbonyl fluoride	6588-63-2	-	-	-	0.02	0.04	-	-
Perfluoropolyethylene Glycol Diol	-	-	-	-	-	-	-	-
Perfluoropolydioxolane Diol	-	-	-	-	5.8E-07	5.9E-08	-	-
Perfluoro (polyethylene glycol) diacid fluoride	-	-	-	-	0.01	0.05	-	-
Perfluoro (polytrimethylene glycol) diacid fluoride	-	-	-	-	0.01	0.04	-	-
Perfluoro (polytetramethylene glycol) diacid fluoride	-	-	-	-	1.0E-02	0.04	-	-
Perfluoropolydioxolane Diacid fluoride	882695-72-9	-	-	-	0.01	0.05	-	-
Tetrachlorohexafluorobutane	375-34-8	-	-	-	0.02	0.08	-	-
Pentachloropentafluorobutane	375-46-2	-	-	-	0.02	0.10	-	-
Hexachlorotetrafluorobutane	375-49-5	-	-	-	0.03	0.14	-	-
Perfluoro (bis-2-chloroethoxy methane)	130085-19-7	2008 Email	200.00	20.00	0.02	0.06	-	-
Perfluoropentane	678-26-2	-	-	-	0.03	0.04	-	-
Perfluorohexane	355-42-0	TAMIS	10000.00	1000.00	0.02	0.04	-	-
Perfluoroheptane	335-57-9	TAMIS	200.00	20.00	0.02	0.04	-	-
Perfluorooctane	307-34-6	2008 Email	20000.00	2000.00	0.01	0.04	-	-
Perfluorononane	375-96-2	-	-	-	0.01	0.04	-	-
Perfluorotridecane	376-03-4	-	-	-	9.3E-03	0.04	-	-
Perfluoropentadecane	2264-03-1	-	-	-	9.2E-03	0.04	-	-
Perfluorodecalin	306-94-5	2008 Email	200.00	20.00	0.01	0.04	-	-
Perfluoroperhydrophenanthrene	306-91-2	-	-	-	9.7E-03	0.04	-	-
Perfluoromethyldecalin	306-92-3	-	-	-	9.6E-03	0.04	-	-
Perfluorodimethylcyclohexane	306-98-9	-	-	-	0.01	0.04	-	-
Perfluoroperhydrofluorene	307-08-4	-	-	-	9.7E-03	0.04	-	-
Perfluorodisopropylcyclohexane	75169-51-6	-	-	-	9.2E-03	0.04	-	-
Perfluorooctyl bromide	423-55-2	-	-	-	1.3E-03	6.3E-06	-	-
Methyl perfluoropentanoate	13038-26-1	-	-	-	0.01	0.05	0.38	0.05
Methyl perfluorohexanoate	424-18-0	-	-	-	0.01	0.05	0.23	0.03
Methyl perfluoroheptanoate	14312-89-1	-	-	-	0.01	0.05	0.14	0.02
Methyl perfluorooctanoate	376-27-2	-	-	-	0.01	0.05	0.10	0.01
Methyl perfluorononanoate	51502-45-5	-	-	-	0.01	0.05	0.05	6.1E-03
Methyl perfluorodecanoate	307-79-7	-	-	-	0.01	0.04	0.02	2.5E-03
Methyl perfluorododecanoate	56554-52-0	-	-	-	0.01	0.04	2.0E-03	2.5E-04
Methyl perfluorotetradecanoate	203302-99-2	-	-	-	1.0E-02	0.04	4.1E-04	4.9E-05
Methyl perfluorohexadecanoate	165457-57-8	-	-	-	9.9E-03	0.04	-	-
Dimethyl perfluorosuccinate	356-36-5	-	-	-	0.02	0.09	0.03	3.4E-03
Dimethyl perfluoroglutarate	1513-62-8	-	-	-	0.02	0.07	8.6E-03	1.1E-03
Dimethyl perfluoro adipate	3107-98-0	-	-	-	0.01	0.06	6.1E-03	7.6E-04
Dimethyl perfluoro-3,6-dioxapentane-1,8-dioate	24647-20-9	-	-	-	0.02	0.07	7.1E-03	8.8E-04
Methyl perfluoro-3,6,9-trioxadecanoate	169289-58-1	-	-	-	0.01	0.05	0.05	5.9E-03
Dimethyl perfluorosuberate	2062-20-6	-	-	-	0.01	0.06	3.6E-03	4.5E-04
Dimethyl perfluoro-3,6,9-trioxadecane-1,11-dioate	35910-59-9	-	-	-	0.01	0.06	4.2E-03	5.1E-04
Methyl perfluoro-3,6-dioxadecanoate	129301-40-2	-	-	-	0.01	0.05	0.05	5.5E-03
Dimethyl perfluoroazelate	2216-90-1	-	-	-	0.01	0.05	2.1E-03	2.5E-04
Dimethyl perfluorosebacate	4590-24-3	-	-	-	0.01	0.05	2.0E-03	2.4E-04
Methyl perfluoroundecanoate	203302-98-1	-	-	-	0.01	0.04	8.9E-03	1.1E-03
Dimethyl perfluoro-1,12-dodecanedioate	84750-88-9	-	-	-	0.01	0.05	6.3E-03	7.5E-04

PROPOSED EMISSIONS FOR FLORENCE SITE

Pollutant	CAS	ESL Source	Short-Term ESL (µg/m3)	Long-Term ESL (µg/m3)	EP3-1		EP3-2	
					(lbs/hr)	(tons/yr)	(lbs/hr)	(tons/yr)
Perfluoropolyethylene	-	-	-	-	0.01	0.05	-	-
Methanol	67-56-1	TAMIS	3900.00	2100.00	0.03	4.7E-04	0.23	0.03
Methyl perfluoro-3,6-dioxaheptanoate	39187-41-2	-	-	-	-	-	0.15	0.02
Methyl perfluoro-3,6,9-trioxatridecanoate	330562-42-0	-	-	-	0.01	0.05	0.01	1.8E-03
Isopropyl Alcohol	67-63-0	TAMIS	4920.00	492.00	4.3E-05	8.1E-07	-	-
1H,1H-Perfluoro-1-pentanol	355-28-2	-	-	-	1.9E-04	6.5E-07	-	-
1H,1H-Perfluoro-1-hexanol	423-46-1	-	-	-	8.1E-05	2.6E-07	-	-
1H,1H-Perfluoro-1-heptanol	375-82-6	-	-	-	4.3E-05	1.3E-07	-	-
1H,1H-Perfluoro-1-octanol	307-30-2	-	-	-	3.0E-05	1.9E-07	-	-
1H,1H-Perfluoro-1-nonanol	423-56-3	-	-	-	1.2E-05	3.7E-08	-	-
1H,1H-Perfluoro-1-decanol	307-37-9	-	-	-	1.5E-06	3.9E-09	-	-
1H,1H-Perfluoro-1-undecanol	307-46-0	-	-	-	8.6E-06	3.0E-08	-	-
1H,1H-Perfluoro-1-dodecanol	423-65-4	-	-	-	7.5E-16	9.3E-20	-	-
1H,1H-Perfluoro-1-tetradecanol	15622-57-8	-	-	-	3.4E-08	6.9E-11	-	-
Perfluoro-3,7-dimethyloctan-1-ol	232587-50-7	-	-	-	1.5E-06	3.8E-09	-	-
1H,1H,4H,4H-Perfluoro-1,4-butanediol	425-61-6	-	-	-	4.4E-08	3.1E-09	-	-
1H,1H,5H,5H-Perfluoro-1,5-pentanediol	376-90-9	-	-	-	1.1E-08	4.6E-11	-	-
1H,1H,6H,6H-Perfluoro-1,6-hexanediol	355-74-8	-	-	-	1.4E-07	8.3E-10	-	-
1H,1H,8H,8H-Perfluoro-1,8-octanediol	90177-96-1	-	-	-	8.5E-08	2.1E-10	-	-
1H,1H,9H,9H-Perfluoro-1,9-nonanediol	203303-01-9	-	-	-	1.9E-10	2.8E-13	-	-
1H,1H,10H,10H-Perfluoro-1,10-decanediol	754-96-1	-	-	-	3.8E-10	6.1E-13	-	-
1H,1H,12H,12H-Perfluoro-1,12-dodecanediol	183162-43-8	-	-	-	1.4E-10	2.2E-13	-	-
Perfluoro-tert-butanol	2378-02-1	2008 Email	1000.00	100.00	1.1E-03	3.9E-06	-	-
Fluorinated diethylene glycol monomethyl ether	330562-43-1	-	-	-	6.4E-05	1.9E-07	-	-
Fluorinated triethylene glycol monomethyl ether	147492-57-7	-	-	-	7.9E-05	2.5E-07	-	-
Fluorinated diethylene glycol monobutyl ether	152914-73-3	-	-	-	5.0E-05	2.6E-07	-	-
Fluorinated triethylene glycol monobutyl ether	317817-24-6	-	-	-	2.0E-05	9.8E-08	-	-
Fluorinated triethylene glycol	129301-42-4	-	-	-	7.5E-09	2.5E-11	-	-
Fluorinated tetraethylene glycol	330562-44-2	-	-	-	2.5E-09	7.7E-12	-	-
Perfluoropentanoic acid	2706-90-3	-	-	-	6.3E-06	3.1E-08	-	-
Perfluorohexanoic acid	307-24-4	-	-	-	6.3E-06	3.1E-08	-	-
Perfluoroheptanoic acid	375-85-9	-	-	-	3.8E-06	1.9E-08	-	-
Perfluorooctanoic acid	335-67-1	TAMIS	0.05	0.01	1.9E-06	1.1E-08	-	-
Perfluorononanoic acid	375-95-1	-	-	-	1.8E-06	9.1E-09	-	-
Perfluorodecanoic acid	335-76-2	2008 Email	14.00	1.40	4.5E-07	2.3E-09	-	-
Perfluoroundecanoic acid	2059-94-8	-	-	-	1.3E-07	6.4E-10	-	-
Perfluorododecanoic acid	307-55-1	-	-	-	1.1E-07	5.4E-10	-	-
Perfluorododecanedioic acid	865-85-0	-	-	-	8.9E-10	4.4E-12	-	-
Perfluorotetradecanoic acid	376-06-7	-	-	-	1.5E-08	7.4E-11	-	-
Perfluorohexadecanoic acid	67905-19-5	-	-	-	1.1E-07	5.7E-10	-	-
Perfluorosuccinic acid	377-38-8	-	-	-	3.1E-08	1.5E-10	-	-
Perfluoroglutaric acid	376-73-8	-	-	-	1.0E-08	5.1E-11	-	-
Perfluoro-3,6-dioxaheptanoic acid	151772-58-6	-	-	-	1.1E-06	5.5E-09	-	-
Perfluoroadipic acid	336-08-3	-	-	-	2.9E-10	1.4E-12	-	-
Perfluoro-3,6-dioxaoctane-1,9-dioic acid	55621-21-1	-	-	-	5.4E-09	2.7E-11	-	-
Perfluoro-3,6,9-trioxadecanoic acid	151772-59-7	-	-	-	9.7E-06	4.8E-08	-	-
Perfluorosuberic acid	678-45-5	-	-	-	2.5E-08	1.2E-10	-	-
Perfluoro-3,6-dioxadecanoic acid	137780-69-9	-	-	-	3.2E-07	1.6E-09	-	-
Perfluoro-3,6,9-trioxaundecane-1,11-dioic acid	55621-18-6	-	-	-	3.4E-10	1.7E-12	-	-
Perfluoroazelaic acid	23453-64-7	-	-	-	6.9E-09	3.5E-11	-	-
Perfluoro-3,7-dimethyloctanoic acid	172155-07-8	-	-	-	6.9E-07	3.4E-09	-	-
Perfluorosebacic acid	307-78-8	-	-	-	1.9E-09	9.7E-12	-	-
Bromine	7726-95-6	TAMIS	7.00	0.70	1.5E-05	7.8E-07	-	-
Perfluorohexyl bromide	335-56-8	-	-	-	1.0E-06	7.7E-10	-	-
Perfluoroheptyl bromide	375-88-2	-	-	-	9.5E-07	7.1E-10	-	-
Perfluorononyl bromide	558-96-3	-	-	-	6.8E-07	5.1E-10	-	-
Perfluorodecyl bromide	307-43-7	-	-	-	7.9E-08	6.0E-11	-	-
Perfluoro-1,4-dibromobutane	335-48-8	-	-	-	2.3E-06	6.9E-09	-	-
Perfluoro-1,6-dibromohexane	918-22-9	-	-	-	1.0E-06	7.5E-10	-	-
Perfluoro-1,8-dibromooctane	812-58-8	-	-	-	2.5E-07	1.9E-10	-	-
Perfluoro-2,5,8-trioxanonyl bromide	330562-45-3	-	-	-	2.7E-07	2.0E-10	-	-
Perfluoro-2,5-dioxanonyl bromide	330562-46-4	-	-	-	3.1E-07	2.4E-10	-	-
Perfluoro-2,5,8-trioxadodecyl bromide	330562-47-5	-	-	-	3.5E-07	2.6E-10	-	-
Perfluoro-1,6-dibromo-2,5-dioxahexane	330562-48-6	-	-	-	5.2E-07	3.9E-10	-	-
Perfluoro-1,9-dibromo-2,5,8-trioxanonane	330562-49-7	-	-	-	7.7E-07	5.8E-10	-	-
polymers of chlorotrifluoroethylene (PCTFE)	9002-83-9	2008 Email	1000.00	100.00	3.3E-04	5.2E-04	0.12	7.8E-03
Toluene	108-88-3	TAMIS	4500.00	1200.00	1.8E-05	2.4E-07	-	-
Butylated Hydroxytoluene	128-37-0	TAMIS	Must Meet NAAQS	Must Meet NAAQS	7.1E-09	8.9E-11	-	-
PDO Diol	-	-	-	-	2.5E-11	4.8E-13	-	-
Perfluorosuccinic anhydride	699-30-9	-	-	-	5.9E-06	1.4E-07	-	-
Perfluoroglutaric anhydride	376-68-1	-	-	-	3.6E-06	8.7E-08	-	-
Acrylic Acid	79-10-7	TAMIS	60.00	6.00	4.8E-08	3.4E-08	-	-
1H,1H-Perfluoro-n-octyl acrylate	307-98-2	-	-	-	3.7E-08	4.4E-09	-	-
1H,1H-Perfluoro-n-decyl acrylate	335-83-1	-	-	-	1.6E-09	2.0E-10	-	-
1H,1H-Perfluoro-n-octyl methacrylate	3934-23-4	-	-	-	3.4E-09	4.1E-10	-	-
1H,1H-Perfluoro-n-decyl methacrylate	23069-32-1	-	-	-	2.5E-09	3.0E-10	-	-

PROPOSED EMISSIONS FOR FLORENCE SITE

Pollutant	CAS	ESL Source	Short-Term ESL (µg/m3)	Long-Term ESL (µg/m3)	EP3-1		EP3-2	
					(lbs/hr)	(tons/yr)	(lbs/hr)	(tons/yr)
1H,1H,6H,8H-Perfluoro-1,6-hexanediol diacrylate	2264-01-9	-	-	-	1.3E-11	1.5E-12	-	-
Perfluoro-[15]-crown-5 ether	97571-69-2	-	-	-	6.5E-07	7.7E-08	-	-
Fluorinated PTMG 250 Diol	146191-87-9	-	-	-	4.4E-07	8.9E-09	-	-
Hydrogen Chloride	7647-01-0	TAMIS	190.00	7.90	0.02	0.09	-	-
Fluorinated Poly (Trimethylene Glycol)	-	-	-	-	5.8E-07	1.2E-08	-	-
Tetraethylene glycol dimethyl ether	143-24-8	-	-	-	3.4E-09	2.2E-10	-	-
Perfluoro(Diethylene Glycol Monoisobutyl Ether)	1423231-12-2	-	-	-	2.5E-05	5.5E-07	-	-
Perfluorocyclohexyl methanol	28788-68-3	-	-	-	8.2E-06	1.4E-07	-	-
Perfluoro(Polyethylene Glycol 400)-CH2OH terminated	146222-54-0	-	-	-	5.8E-07	1.2E-08	-	-
Ethyl acetate	141-78-6	TAMIS	3100.00	1440.00	5.8E-04	1.0E-04	-	-
Perfluoro-t-butylcyclohexane	84808-64-0	2008 Email	200.00	20.00	-	-	-	-
1,1,2-Trichloro-1,2,2-trifluoroethane	76-13-1	TAMIS	38000.00	3800.00	-	-	-	-
Perfluorobutyl Fluoride	335-42-2	-	-	-	-	-	-	-
Perfluoropropane	76-19-7	TAMIS	10000.00	1000.00	-	-	-	-
Carbon tetrafluoride	75-73-0	TAMIS	18000.00	1800.00	0.99	4.35	-	-
Tetrahydrofuran	109-99-9	TAMIS	1500.00	150.00	1.8E-03	6.9E-03	-	-
Acid Fluorides	-	-	-	-	-	-	-	-
Hydrogen Bromide	10035-10-6	TAMIS	100.00	10.00	2.0E-04	1.3E-05	-	-
Oxides of Nitrogen	10102-43-9	TAMIS	Must Meet NAAQS	Must Meet NAAQS	0.05	0.20	-	-
Carbon Monoxide	630-08-0	TAMIS	Must Meet NAAQS	Must Meet NAAQS	0.06	0.03	-	-

PROPOSED EMISSIONS FOR FLORENCE SITE

Pollutant	CAS	ESL Source	Short-Term ESL (µg/m3)	Long-Term ESL (µg/m3)	EP3-3		EP3-4	
					(lbs/hr)	(tons/yr)	(lbs/hr)	(tons/yr)
Hydrogen Fluoride	7664-39-3	TAMIS	18.00	8.70	-	-	-	-
Hydrogen Fluoride (Agriculture)	7664-39-3	TAMIS	3.00	0.60	-	-	-	-
Hydrogen Fluoride (Agriculture with Cattle)	7664-39-3	TAMIS	n/a	0.75	-	-	-	-
Difluorine	7782-41-4	TAMIS	2.00	0.20	-	-	-	-
Carbonyl Fluoride	353-50-4	TAMIS	17.00	8.10	-	-	-	-
Carbonyl Fluoride (Agriculture)	353-50-4	TAMIS	2.80	0.57	-	-	-	-
Carbonyl Fluoride (Agriculture with Cattle)	353-50-4	TAMIS	n/a	0.71	-	-	-	-
Acetyl Fluorides	354-34-7	2008 Email	200.00	20.00	-	-	-	-
Trifluoroacetic acid	76-05-1	TAMIS	17.00	8.10	-	-	-	-
Trifluoroacetic acid (Agriculture)	76-05-1	TAMIS	2.80	0.57	-	-	-	-
Trifluoroacetic acid (Agriculture with Cattle)	76-05-1	TAMIS	n/a	0.71	-	-	-	-
Perfluoropentanoyl fluoride	375-62-2	-	-	-	-	-	-	-
Perfluorohexanoyl fluoride	355-38-4	-	-	-	-	-	-	-
Perfluoroheptanoyl fluoride	375-84-8	-	-	-	-	-	-	-
Perfluorooctanoyl fluoride	335-66-0	-	-	-	-	-	-	-
Perfluorononanoyl fluoride	558-95-2	-	-	-	-	-	-	-
Perfluorodecyl fluoride	594-98-9	2008 Email	200.00	20.00	-	-	-	-
Perfluorosuccinoyl fluoride	679-13-0	-	-	-	-	-	-	-
Hexafluoroglutaroyl fluoride	678-78-4	-	-	-	-	-	-	-
Octafluorodipoyl fluoride	37881-62-2	-	-	-	-	-	-	-
Perfluorosuberoyl fluoride	24647-09-4	-	-	-	-	-	-	-
Perfluorosebacoyl fluoride	-	-	-	-	-	-	-	-
Perfluorobutoxyethoxyacetyl fluoride	172897-75-5	-	-	-	-	-	-	-
Perfluorotriglycyl fluoride	24647-19-6	-	-	-	-	-	-	-
Perfluoro-3,6,9-Trioxatridecanoyl fluoride	883733-06-0	-	-	-	-	-	-	-
Perfluorotetraglycyl fluoride	24689-56-3	-	-	-	-	-	-	-
Perfluoro-3,6,9-trioxatridecanoic acid	330562-41-9	-	-	-	-	-	-	-
Perfluoropolyethylene Glycol Glycyl fluoride	-	-	-	-	-	-	-	-
Perfluoropolytrimethylene acyl fluoride	-	-	-	-	-	-	-	-
Perfluoropolytetramethylene acyl fluoride	-	-	-	-	-	-	-	-
Perfluoropolydioxolane diacyl fluoride	-	-	-	-	-	-	-	-
Perfluorocyclohexyl carbonyl fluoride	6588-63-2	-	-	-	-	-	-	-
Perfluoropolyethylene Glycol Diol	-	-	-	-	-	-	-	-
Perfluoropolydioxolane Diol	-	-	-	-	-	-	-	-
Perfluoro (polyethylene glycol) diacid fluoride	-	-	-	-	-	-	-	-
Perfluoro (polytrimethylene glycol) diacid fluoride	-	-	-	-	-	-	-	-
Perfluoro (polytetramethylene glycol) diacid fluoride	-	-	-	-	-	-	-	-
Perfluoropolydioxolane Diacid fluoride	882695-72-9	-	-	-	-	-	-	-
Tetrachlorohexafluorobutane	375-34-8	-	-	-	-	-	-	-
Pentachloropentafluorobutane	375-46-2	-	-	-	-	-	-	-
Hexachlorotetrafluorobutane	375-49-5	-	-	-	-	-	-	-
Perfluoro (bis-2-chloroethoxy methane)	130085-19-7	2008 Email	200.00	20.00	-	-	-	-
Perfluoropentane	678-26-2	-	-	-	-	-	-	-
Perfluorohexane	355-42-0	TAMIS	10000.00	1000.00	-	-	-	-
Perfluoroheptane	335-57-9	TAMIS	200.00	20.00	-	-	-	-
Perfluorooctane	307-34-6	2008 Email	20000.00	2000.00	-	-	-	-
Perfluorononane	375-96-2	-	-	-	-	-	-	-
Perfluorodecane	376-03-4	-	-	-	-	-	-	-
Perfluoropentadecane	2264-03-1	-	-	-	-	-	-	-
Perfluorodecalin	306-94-5	2008 Email	200.00	20.00	-	-	-	-
Perfluoroperhydrophenanthrene	306-91-2	-	-	-	-	-	-	-
Perfluoromethyldecalin	306-92-3	-	-	-	-	-	-	-
Perfluorodimethylcyclohexane	306-98-9	-	-	-	-	-	-	-
Perfluoroperhydrofluorene	307-08-4	-	-	-	-	-	-	-
Perfluorodisopropylcyclohexane	75169-51-6	-	-	-	-	-	-	-
Perfluorooctyl bromide	423-55-2	-	-	-	-	-	-	-
Methyl perfluoropentanoate	13038-26-1	-	-	-	0.50	0.06	-	-
Methyl perfluorohexanoate	424-18-0	-	-	-	0.30	0.04	-	-
Methyl perfluoroheptanoate	14312-89-1	-	-	-	0.18	0.02	-	-
Methyl perfluorooctanoate	376-27-2	-	-	-	0.13	0.02	-	-
Methyl perfluorononanoate	51502-45-5	-	-	-	0.06	8.2E-03	-	-
Methyl perfluorodecanoate	307-79-7	-	-	-	0.03	3.9E-03	-	-
Methyl perfluorododecanoate	56554-52-0	-	-	-	2.6E-03	3.9E-04	-	-
Methyl perfluorotetradecanoate	203302-99-2	-	-	-	5.2E-04	6.6E-05	-	-
Methyl perfluorohexadecanoate	165457-57-8	-	-	-	-	-	-	-
Dimethyl perfluorosuccinate	356-36-5	-	-	-	0.04	4.7E-03	-	-
Dimethyl perfluoroglutarate	1513-62-8	-	-	-	0.01	1.5E-03	-	-
Dimethyl perfluoro adipate	3107-98-0	-	-	-	7.9E-03	1.0E-03	-	-
Dimethyl perfluoro-3,6-dioxaoctane-1,8-dioate	24647-20-9	-	-	-	9.2E-03	1.2E-03	-	-
Methyl perfluoro-3,6,9-trioxadecanoate	169289-58-1	-	-	-	0.06	8.0E-03	-	-
Dimethyl perfluorosuberate	2062-20-6	-	-	-	4.7E-03	6.1E-04	-	-
Dimethyl perfluoro-3,6,9-trioxadecane-1,11-dioate	35910-59-9	-	-	-	5.4E-03	7.0E-04	-	-
Methyl perfluoro-3,6-dioxadecanoate	129301-40-2	-	-	-	0.06	7.5E-03	-	-
Dimethyl perfluoroazelate	2216-90-1	-	-	-	2.7E-03	3.4E-04	-	-
Dimethyl perfluorosebacate	4590-24-3	-	-	-	2.6E-03	3.3E-04	-	-
Methyl perfluoroundecanoate	203302-98-1	-	-	-	0.01	1.4E-03	-	-
Dimethyl perfluoro-1,12-decanedioate	84750-88-9	-	-	-	8.0E-03	1.0E-03	-	-

PROPOSED EMISSIONS FOR FLORENCE SITE

Pollutant	CAS	ESL Source	Short-Term ESL (µg/m3)	Long-Term ESL (µg/m3)	EP3-3		EP3-4	
					(lbs/hr)	(tons/yr)	(lbs/hr)	(tons/yr)
Perfluoropolyethylene	-	-	-	-	-	-	-	-
Methanol	67-56-1	TAMIS	3900.00	2100.00	0.32	0.04	-	-
Methyl perfluoro-3,6-dioxahexanoate	39187-41-2	-	-	-	0.19	0.03	-	-
Methyl perfluoro-3,6,9-trioxatridecanoate	330562-42-0	-	-	-	0.02	2.4E-03	-	-
Isopropyl Alcohol	67-63-0	TAMIS	4920.00	492.00	-	-	-	-
1H,1H-Perfluoro-1-pentanol	355-28-2	-	-	-	-	-	-	-
1H,1H-Perfluoro-1-hexanol	423-46-1	-	-	-	-	-	-	-
1H,1H-Perfluoro-1-heptanol	375-82-6	-	-	-	-	-	-	-
1H,1H-Perfluoro-1-octanol	307-30-2	-	-	-	-	-	-	-
1H,1H-Perfluoro-1-nonanol	423-56-3	-	-	-	-	-	-	-
1H,1H-Perfluoro-1-decanol	307-37-9	-	-	-	-	-	-	-
1H,1H-Perfluoro-1-undecanol	307-46-0	-	-	-	-	-	-	-
1H,1H-Perfluoro-1-dodecanol	423-65-4	-	-	-	-	-	-	-
1H,1H-Perfluoro-1-tetradecanol	15622-57-8	-	-	-	-	-	-	-
Perfluoro-3,7-dimethyloctan-1-ol	232587-50-7	-	-	-	-	-	-	-
1H,1H,4H,4H-Perfluoro-1,4-butanediol	425-61-6	-	-	-	-	-	-	-
1H,1H,5H,5H-Perfluoro-1,5-pentanediol	376-90-9	-	-	-	-	-	-	-
1H,1H,6H,6H-Perfluoro-1,6-hexanediol	355-74-8	-	-	-	-	-	-	-
1H,1H,8H,8H-Perfluoro-1,8-octanediol	90177-96-1	-	-	-	-	-	-	-
1H,1H,9H,9H-Perfluoro-1,9-nonanediol	203303-01-9	-	-	-	-	-	-	-
1H,1H,10H,10H-Perfluoro-1,10-decanediol	754-96-1	-	-	-	-	-	-	-
1H,1H,12H,12H-Perfluoro-1,12-dodecanediol	183162-43-8	-	-	-	-	-	-	-
Perfluoro-tert-butanol	2378-02-1	2008 Email	1000.00	100.00	-	-	-	-
Fluorinated diethylene glycol monomethyl ether	330562-43-1	-	-	-	-	-	-	-
Fluorinated triethylene glycol monomethyl ether	147492-57-7	-	-	-	-	-	-	-
Fluorinated diethylene glycol monobutyl ether	152914-73-3	-	-	-	-	-	-	-
Fluorinated triethylene glycol monobutyl ether	317817-24-6	-	-	-	-	-	-	-
Fluorinated triethylene glycol	129301-42-4	-	-	-	-	-	-	-
Fluorinated tetraethylene glycol	330562-44-2	-	-	-	-	-	-	-
Perfluoropentanoic acid	2706-90-3	-	-	-	-	-	-	-
Perfluorohexanoic acid	307-24-4	-	-	-	-	-	-	-
Perfluoroheptanoic acid	375-85-9	-	-	-	-	-	-	-
Perfluorooctanoic acid	335-67-1	TAMIS	0.05	0.01	-	-	-	-
Perfluorononanoic acid	375-95-1	-	-	-	-	-	-	-
Perfluorodecanoic acid	335-76-2	2008 Email	14.00	1.40	-	-	-	-
Perfluoroundecanoic acid	2058-94-8	-	-	-	-	-	-	-
Perfluorododecanoic acid	307-55-1	-	-	-	-	-	-	-
Perfluorododecanedioic acid	865-85-0	-	-	-	-	-	-	-
Perfluorotetradecanoic acid	376-06-7	-	-	-	-	-	-	-
Perfluorohexadecanoic acid	67905-19-5	-	-	-	-	-	-	-
Perfluorosuccinic acid	377-38-8	-	-	-	-	-	-	-
Perfluoroglutaric acid	376-73-8	-	-	-	-	-	-	-
Perfluoro-3,6-dioxahexanoic acid	151772-58-6	-	-	-	-	-	-	-
Perfluoroadipic acid	336-08-3	-	-	-	-	-	-	-
Perfluoro-3,6-dioxaoctane-1,8-dioic acid	55621-21-1	-	-	-	-	-	-	-
Perfluoro-3,6,9-trioxadecanoic acid	151772-59-7	-	-	-	-	-	-	-
Perfluorosuberlic acid	678-45-5	-	-	-	-	-	-	-
Perfluoro-3,6-dioxadecanoic acid	137780-69-9	-	-	-	-	-	-	-
Perfluoro-3,6,9-trioxoundecane-1,11-dioic acid	55621-18-6	-	-	-	-	-	-	-
Perfluoroazelaic acid	23453-64-7	-	-	-	-	-	-	-
Perfluoro-3,7-dimethyloctanoic acid	172155-07-8	-	-	-	-	-	-	-
Perfluorosebacic acid	307-78-8	-	-	-	-	-	-	-
Bromine	7726-95-6	TAMIS	7.00	0.70	-	-	-	-
Perfluorohexyl bromide	335-56-8	-	-	-	-	-	-	-
Perfluoroheptyl bromide	375-88-2	-	-	-	-	-	-	-
Perfluorononyl bromide	558-96-3	-	-	-	-	-	-	-
Perfluorodecyl bromide	307-43-7	-	-	-	-	-	-	-
Perfluoro-1,4-dibromobutane	335-48-8	-	-	-	-	-	-	-
Perfluoro-1,6-dibromohexane	918-22-9	-	-	-	-	-	-	-
Perfluoro-1,8-dibromooctane	812-58-8	-	-	-	-	-	-	-
Perfluoro-2,5,8-trioxanonyl bromide	330562-45-3	-	-	-	-	-	-	-
Perfluoro-2,5-dioxanonyl bromide	330562-46-4	-	-	-	-	-	-	-
Perfluoro-2,5,8-trioxadodecyl bromide	330562-47-5	-	-	-	-	-	-	-
Perfluoro-1,6-dibromo-2,5-dioxahexane	330562-48-6	-	-	-	-	-	-	-
Perfluoro-1,9-dibromo-2,5,8-trioxanonane	330562-49-7	-	-	-	-	-	-	-
polymers of chlorotrifluoroethylene (PCTFE)	9002-83-9	2008 Email	1000.00	100.00	0.17	0.01	-	-
Toluene	108-88-3	TAMIS	4500.00	1200.00	-	-	-	-
Butylated Hydroxytoluene	128-37-0	TAMIS	Must Meet NAAQS	Must Meet NAAQS	-	-	-	-
PDO Diol	-	-	-	-	-	-	-	-
Perfluorosuccinic anhydride	699-30-9	-	-	-	-	-	-	-
Perfluoroglutaric anhydride	376-68-1	-	-	-	-	-	-	-
Acrylic Acid	79-10-7	TAMIS	60.00	6.00	-	-	-	-
1H,1H-Perfluoro-n-octyl acrylate	307-98-2	-	-	-	-	-	-	-
1H,1H-Perfluoro-n-decyl acrylate	335-83-1	-	-	-	-	-	-	-
1H,1H-Perfluoro-n-octyl methacrylate	3934-23-4	-	-	-	-	-	-	-
1H,1H-Perfluoro-n-decyl methacrylate	23069-32-1	-	-	-	-	-	-	-

PROPOSED EMISSIONS FOR FLORENCE SITE

Pollutant	CAS	ESL Source	Short-Term ESL (µg/m3)	Long-Term ESL (µg/m3)	EP3-3		EP3-4	
					(lbs/hr)	(tons/yr)	(lbs/hr)	(tons/yr)
1H,1H,6H,6H-Perfluoro-1,6-hexanediol diacrylate	2264-01-9	-	-	-	-	-	-	-
Perfluoro-[15]-crown-5 ether	97571-69-2	-	-	-	-	-	-	-
Fluorinated PTMG 250 Diol	146191-87-9	-	-	-	-	-	-	-
Hydrogen Chloride	7647-01-0	TAMIS	190.00	7.90	-	-	-	-
Fluorinated Poly (Trimethylene Glycol)	-	-	-	-	-	-	-	-
Tetraethylene glycol dimethyl ether	143-24-8	-	-	-	-	-	-	-
Perfluoro(Diethylene Glycol Monoisobutyl Ether)	1423231-12-2	-	-	-	-	-	-	-
Perfluorocyclohexyl methanol	26788-68-3	-	-	-	-	-	-	-
Perfluoro(Polyethylene Glycol 400)-CH2OH terminated	146222-54-0	-	-	-	-	-	-	-
Ethyl acetate	141-78-6	TAMIS	3100.00	1440.00	-	-	-	-
Perfluoro-t-butylcyclohexane	84808-64-0	2008 Email	200.00	20.00	-	-	-	-
1,1,2-Trichloro-1,2,2-trifluoroethane	76-13-1	TAMIS	38000.00	3800.00	-	-	-	-
Perfluorobutryl Fluoride	335-42-2	-	-	-	-	-	-	-
Perfluoropropane	76-19-7	TAMIS	10000.00	1000.00	-	-	-	-
Carbon tetrafluoride	75-73-0	TAMIS	18000.00	1800.00	-	-	-	-
Tetrahydrofuran	109-99-9	TAMIS	1500.00	150.00	-	-	4.2E-03	0.02
Acid Fluorides	-	-	-	-	-	-	-	-
Hydrogen Bromide	10035-10-6	TAMIS	100.00	10.00	-	-	-	-
Oxides of Nitrogen	10102-43-9	TAMIS	Must Meet NAAQS	Must Meet NAAQS	-	-	-	-
Carbon Monoxide	630-08-0	TAMIS	Must Meet NAAQS	Must Meet NAAQS	-	-	-	-

PROPOSED EMISSIONS FOR FLORENCE SITE

Pollutant	CAS	ESL Source	Short-Term ESL (µg/m3)	Long-Term ESL (µg/m3)	EP3-5		FUG3-1	
					(lbs/hr)	(tons/yr)	(lbs/hr)	(tons/yr)
Hydrogen Fluoride	7664-39-3	TAMIS	18.00	8.70	-	-	0.13	0.56
Hydrogen Fluoride (Agriculture)	7664-39-3	TAMIS	3.00	0.60	-	-	0.13	0.56
Hydrogen Fluoride (Agriculture with Cattle)	7664-39-3	TAMIS	n/a	0.75	-	-	0.13	0.56
Difluorine	7782-41-4	TAMIS	2.00	0.20	-	-	0.10	0.45
Carbonyl Fluoride	353-50-4	TAMIS	17.00	8.10	-	-	-	-
Carbonyl Fluoride (Agriculture)	353-50-4	TAMIS	2.80	0.57	-	-	-	-
Carbonyl Fluoride (Agriculture with Cattle)	353-50-4	TAMIS	n/a	0.71	-	-	-	-
Acetyl Fluorides	354-34-7	2008 Email	200.00	20.00	-	-	1.1E-03	4.8E-03
Trifluoroacetic acid	76-05-1	TAMIS	17.00	8.10	-	-	-	-
Trifluoroacetic acid (Agriculture)	76-05-1	TAMIS	2.80	0.57	-	-	-	-
Trifluoroacetic acid (Agriculture with Cattle)	76-05-1	TAMIS	n/a	0.71	-	-	-	-
Perfluoropentanoyl fluoride	375-62-2	-	-	-	-	-	0.01	0.05
Perfluorohexanoyl fluoride	355-38-4	-	-	-	-	-	4.7E-03	0.02
Perfluoroheptanoyl fluoride	375-84-8	-	-	-	-	-	8.7E-03	0.04
Perfluorooctanoyl Fluoride	335-66-0	-	-	-	-	-	7.4E-03	0.03
Perfluorononanoyl fluoride	558-95-2	-	-	-	-	-	0.01	0.04
Perfluorodecyl fluoride	594-98-9	2008 Email	200.00	20.00	-	-	6.0E-03	0.03
Perfluorosuccinoyl fluoride	679-13-0	-	-	-	-	-	4.7E-03	0.02
Hexafluoroglutaroyl fluoride	678-78-4	-	-	-	-	-	7.4E-03	0.03
Octafluoroacetyl fluoride	37881-62-2	-	-	-	-	-	0.02	0.07
Perfluorosuberoyl fluoride	24647-09-4	-	-	-	-	-	6.0E-03	0.03
Perfluorosebacoyl fluoride	-	-	-	-	-	-	-	-
Perfluorobutoxyethoxyacetyl fluoride	172897-75-5	-	-	-	-	-	5.3E-03	0.02
Perfluorotriglycolyl fluoride	24647-19-6	-	-	-	-	-	2.0E-03	8.6E-03
Perfluoro-3,6,9-Trioxadecanoyl Fluoride	883733-06-0	-	-	-	-	-	6.8E-03	0.03
Perfluorotetraglycolyl fluoride	24689-56-3	-	-	-	-	-	2.0E-03	8.6E-03
Perfluoro-3,6,9-trioxadecanoic acid	330562-41-9	-	-	-	-	-	-	-
Perfluoropolyethylene Glycol Glycolyl fluoride	-	-	-	-	-	-	6.3E-03	0.03
Perfluoropolytrimethylene acyl fluoride	-	-	-	-	-	-	-	-
Perfluoropolytetramethylene acyl fluoride	-	-	-	-	-	-	-	-
Perfluoropolydioxolane diacyl fluoride	-	-	-	-	-	-	-	-
Perfluorocyclohexyl carbonyl fluoride	6588-63-2	-	-	-	-	-	4.7E-03	0.02
Perfluoropolyethylene Glycol Diol	-	-	-	-	-	-	-	-
Perfluoropolydioxolane Diol	-	-	-	-	-	-	-	-
Perfluoro (polyethylene glycol) diacid fluoride	-	-	-	-	-	-	2.0E-03	8.6E-03
Perfluoro (polytrimethylene glycol) diacid fluoride	-	-	-	-	-	-	2.0E-03	8.6E-03
Perfluoro (polytetramethylene glycol) diacid fluoride	-	-	-	-	-	-	1.9E-03	8.2E-03
Perfluoropolydioxolane Diacid fluoride	882695-72-9	-	-	-	-	-	9.9E-03	0.04
Tetrachlorohexafluorobutane	375-34-8	-	-	-	-	-	0.30	1.32
Pentachloropentafluorobutane	375-46-2	-	-	-	-	-	0.15	0.67
Hexachlorotetrafluorobutane	375-49-5	-	-	-	-	-	0.06	0.27
Perfluoro (bis-2-chloroethoxy methane)	130085-19-7	2008 Email	200.00	20.00	-	-	0.11	0.50
Perfluoropentane	678-26-2	-	-	-	-	-	0.11	0.48
Perfluorohexane	355-42-0	TAMIS	10000.00	1000.00	-	-	0.20	0.88
Perfluoroheptane	335-57-9	TAMIS	200.00	20.00	-	-	0.51	2.24
Perfluorooctane	307-34-6	2008 Email	20000.00	2000.00	-	-	0.38	1.67
Perfluorononane	375-96-2	-	-	-	-	-	0.11	0.48
Perfluorodecane	376-03-4	-	-	-	-	-	0.07	0.29
Perfluoropentadecane	2264-03-1	-	-	-	-	-	0.07	0.29
Perfluorodecalin	306-94-5	2008 Email	200.00	20.00	-	-	0.54	2.35
Perfluoroperhydrophenanthrene	306-91-2	-	-	-	-	-	0.09	0.37
Perfluoromethyldecalin	306-92-3	-	-	-	-	-	0.07	0.29
Perfluorodimethylcyclohexane	306-98-9	-	-	-	-	-	0.11	0.48
Perfluoroperhydrofluorene	307-08-4	-	-	-	-	-	0.07	0.29
Perfluorodisopropylcyclohexane	75169-51-6	-	-	-	-	-	-	-
Perfluorooctyl bromide	423-55-2	-	-	-	-	-	0.07	0.29
Methyl perfluoropentanoate	13038-26-1	-	-	-	-	-	-	-
Methyl perfluorohexanoate	424-18-0	-	-	-	-	-	-	-
Methyl perfluoroheptanoate	14312-89-1	-	-	-	-	-	-	-
Methyl perfluorooctanoate	376-27-2	-	-	-	-	-	-	-
Methyl perfluorononanoate	51502-45-5	-	-	-	-	-	-	-
Methyl perfluorodecanoate	307-79-7	-	-	-	-	-	-	-
Methyl perfluorododecanoate	56554-52-0	-	-	-	-	-	-	-
Methyl perfluorotetradecanoate	203302-99-2	-	-	-	-	-	-	-
Methyl perfluorohexadecanoate	165457-57-8	-	-	-	-	-	-	-
Dimethyl perfluorosuccinate	356-36-5	-	-	-	-	-	1.4E-03	5.9E-03
Dimethyl perfluoroglutarate	1513-62-8	-	-	-	-	-	-	-
Dimethyl perfluoro adipate	3107-98-0	-	-	-	-	-	-	-
Dimethyl perfluoro-3,6-dioxaoctane-1,8-dioate	24647-20-9	-	-	-	-	-	-	-
Methyl perfluoro-3,6,9-trioxadecanoate	169289-58-1	-	-	-	-	-	-	-
Dimethyl perfluorosuberate	2062-20-6	-	-	-	-	-	-	-
Dimethyl perfluoro-3,6,9-trioxadecane-1,11-dioate	35910-59-9	-	-	-	-	-	-	-
Methyl perfluoro-3,6-dioxadecanoate	129301-40-2	-	-	-	-	-	-	-
Dimethyl perfluoroazolate	2216-90-1	-	-	-	-	-	-	-
Dimethyl perfluorosebacate	4590-24-3	-	-	-	-	-	-	-
Methyl perfluoroundecanoate	203302-98-1	-	-	-	-	-	-	-
Dimethyl perfluoro-1,12-decanedioate	84750-88-9	-	-	-	-	-	-	-

PROPOSED EMISSIONS FOR FLORENCE SITE

Pollutant	CAS	ESL Source	Short-Term ESL (µg/m3)	Long-Term ESL (µg/m3)	EP3-5		FUG3-1	
					(lbs/hr)	(tons/yr)	(lbs/hr)	(tons/yr)
Perfluoropolyethylene	-	-	-	-	-	-	-	-
Methanol	67-56-1	TAMIS	3900.00	2100.00	-	-	0.05	0.20
Methyl perfluoro-3,6-dioxahexanoate	39187-41-2	-	-	-	-	-	-	-
Methyl perfluoro-3,6,9-trioxatridecanoate	330562-42-0	-	-	-	-	-	-	-
Isopropyl Alcohol	67-63-0	TAMIS	4920.00	492.00	-	-	-	-
1H,1H-Perfluoro-1-pentanol	355-28-2	-	-	-	-	-	-	-
1H,1H-Perfluoro-1-hexanol	423-46-1	-	-	-	-	-	-	-
1H,1H-Perfluoro-1-heptanol	375-82-6	-	-	-	-	-	-	-
1H,1H-Perfluoro-1-octanol	307-30-2	-	-	-	-	-	-	-
1H,1H-Perfluoro-1-nonanol	423-56-3	-	-	-	-	-	-	-
1H,1H-Perfluoro-1-decanol	307-37-9	-	-	-	-	-	-	-
1H,1H-Perfluoro-1-undecanol	307-46-0	-	-	-	-	-	-	-
1H,1H-Perfluoro-1-dodecanol	423-65-4	-	-	-	-	-	-	-
1H,1H-Perfluoro-1-tetradecanol	15622-57-8	-	-	-	-	-	-	-
Perfluoro-3,7-dimethyloctan-1-ol	232587-50-7	-	-	-	-	-	-	-
1H,1H,4H,4H-Perfluoro-1,4-butanediol	425-61-6	-	-	-	-	-	-	-
1H,1H,5H,5H-Perfluoro-1,5-pentanediol	376-90-9	-	-	-	-	-	-	-
1H,1H,6H,6H-Perfluoro-1,6-hexanediol	355-74-8	-	-	-	-	-	-	-
1H,1H,8H,8H-Perfluoro-1,8-octanediol	90177-96-1	-	-	-	-	-	-	-
1H,1H,9H,9H-Perfluoro-1,9-nonanediol	203303-01-9	-	-	-	-	-	-	-
1H,1H,10H,10H-Perfluoro-1,10-decanediol	754-96-1	-	-	-	-	-	-	-
1H,1H,12H,12H-Perfluoro-1,12-dodecanediol	183162-43-8	-	-	-	-	-	-	-
Perfluoro-tert-butanol	2378-02-1	2008 Email	1000.00	100.00	-	-	-	-
Fluorinated diethylene glycol monomethyl ether	330562-43-1	-	-	-	-	-	-	-
Fluorinated triethylene glycol monomethyl ether	147492-57-7	-	-	-	-	-	-	-
Fluorinated diethylene glycol monobutyl ether	152914-73-3	-	-	-	-	-	-	-
Fluorinated triethylene glycol monobutyl ether	317817-24-6	-	-	-	-	-	-	-
Fluorinated triethylene glycol	129301-42-4	-	-	-	-	-	-	-
Fluorinated tetraethylene glycol	330562-44-2	-	-	-	-	-	-	-
Perfluoropentanoic acid	2706-90-3	-	-	-	-	-	-	-
Perfluorohexanoic acid	307-24-4	-	-	-	-	-	-	-
Perfluoroheptanoic acid	375-85-9	-	-	-	-	-	-	-
Perfluorooctanoic acid	335-67-1	TAMIS	0.05	0.01	-	-	-	-
Perfluorononanoic acid	375-95-1	-	-	-	-	-	-	-
Perfluorodecanoic acid	335-76-2	2008 Email	14.00	1.40	-	-	-	-
Perfluoroundecanoic acid	2058-94-8	-	-	-	-	-	-	-
Perfluorododecanoic acid	307-55-1	-	-	-	-	-	-	-
Perfluorododecanedioic acid	865-85-0	-	-	-	-	-	-	-
Perfluorotetradecanoic acid	376-06-7	-	-	-	-	-	-	-
Perfluorohexadecanoic acid	67905-19-5	-	-	-	-	-	-	-
Perfluorosuccinic acid	377-38-8	-	-	-	-	-	-	-
Perfluoroglutaric acid	376-73-8	-	-	-	-	-	-	-
Perfluoro-3,6-dioxahexanoic acid	151772-58-6	-	-	-	-	-	-	-
Perfluoroadipic acid	336-08-3	-	-	-	-	-	-	-
Perfluoro-3,6-dioxaoctane-1,8-dioic acid	55821-21-1	-	-	-	-	-	-	-
Perfluoro-3,6,9-trioxadecanoic acid	151772-59-7	-	-	-	-	-	-	-
Perfluorosuberic acid	678-45-5	-	-	-	-	-	-	-
Perfluoro-3,6-dioxadecanoic acid	137780-69-9	-	-	-	-	-	-	-
Perfluoro-3,6,9-trioxaundecane-1,11-dioic acid	55621-18-6	-	-	-	-	-	-	-
Perfluoroazelaic acid	23453-64-7	-	-	-	-	-	-	-
Perfluoro-3,7-dimethyloctanoic acid	172155-07-8	-	-	-	-	-	-	-
Perfluorosebacic acid	307-78-8	-	-	-	-	-	-	-
Bromine	7726-95-6	TAMIS	7.00	0.70	-	-	0.14	0.60
Perfluorohexyl bromide	335-56-8	-	-	-	-	-	-	-
Perfluoroheptyl bromide	375-88-2	-	-	-	-	-	-	-
Perfluorononyl bromide	558-96-3	-	-	-	-	-	-	-
Perfluorodecyl bromide	307-43-7	-	-	-	-	-	-	-
Perfluoro-1,4-dibromobutane	335-48-8	-	-	-	-	-	-	-
Perfluoro-1,6-dibromohexane	918-22-9	-	-	-	-	-	-	-
Perfluoro-1,8-dibromooctane	812-58-8	-	-	-	-	-	-	-
Perfluoro-2,5,8-trioxanonyl bromide	330562-45-3	-	-	-	-	-	-	-
Perfluoro-2,5-dioxanonyl bromide	330562-46-4	-	-	-	-	-	-	-
Perfluoro-2,5,8-trioxadodecyl bromide	330562-47-5	-	-	-	-	-	-	-
Perfluoro-1,6-dibromo-2,5-dioxahexane	330562-48-6	-	-	-	-	-	-	-
Perfluoro-1,9-dibromo-2,5,8-trioxanonane	330562-49-7	-	-	-	-	-	-	-
polymers of chlorotrifluoroethylene (PCTFE)	9002-83-9	2008 Email	1000.00	100.00	-	-	0.03	0.12
Toluene	108-88-3	TAMIS	4500.00	1200.00	-	-	-	-
Butylated Hydroxytoluene	128-37-0	TAMIS	Must Meet NAAQS	Must Meet NAAQS	-	-	-	-
PDO Diol	-	-	-	-	-	-	-	-
Perfluorosuccinic anhydride	699-30-9	-	-	-	-	-	-	-
Perfluoroglutaric anhydride	376-68-1	-	-	-	-	-	-	-
Acrylic Acid	79-10-7	TAMIS	60.00	6.00	-	-	-	-
1H,1H-Perfluoro-n-octyl acrylate	307-98-2	-	-	-	-	-	-	-
1H,1H-Perfluoro-n-decyl acrylate	335-83-1	-	-	-	-	-	-	-
1H,1H-Perfluoro-n-octyl methacrylate	3934-23-4	-	-	-	-	-	-	-
1H,1H-Perfluoro-n-decyl methacrylate	23089-32-1	-	-	-	-	-	-	-

PROPOSED EMISSIONS FOR FLORENCE SITE

Pollutant	CAS	ESL Source	Short-Term ESL (µg/m3)	Long-Term ESL (µg/m3)	EP3-5		FUG3-1	
					(lbs/hr)	(tons/yr)	(lbs/hr)	(tons/yr)
1H,1H,6H,6H-Perfluoro-1,6-hexanediol diacrylate	2264-01-9	-	-	-	-	-	-	-
Perfluoro-[15]-crown-5 ether	97571-69-2	-	-	-	-	-	-	-
Fluorinated PTMG 250 Diol	146191-87-9	-	-	-	-	-	0.04	0.19
Hydrogen Chloride	7647-01-0	TAMIS	190.00	7.90	-	-	-	-
Fluorinated Poly (Trimethylene Glycol)	-	-	-	-	-	-	1.4E-03	5.9E-03
Tetraethylene glycol dimethyl ether	143-24-8	-	-	-	-	-	-	-
Perfluoro(Diethylene Glycol Monoisobutyl Ether)	1423231-12-2	-	-	-	-	-	-	-
Perfluorocyclohexyl methanol	28788-68-3	-	-	-	-	-	-	-
Perfluoro(Polyethylene Glycol 400)-CH2OH terminated	146222-54-0	-	-	-	-	-	-	-
Ethyl acetate	141-78-6	TAMIS	3100.00	1440.00	-	-	-	-
Perfluoro-t-butylcyclohexane	84808-64-0	2008 Email	200.00	20.00	-	-	2.9E-03	0.01
1,1,2-Trichloro-1,2,2-trifluoroethane	76-13-1	TAMIS	38000.00	3800.00	-	-	0.05	0.20
Perfluorobutyl Fluoride	335-42-2	-	-	-	-	-	2.7E-03	0.01
Perfluoropropane	76-19-7	TAMIS	10000.00	1000.00	-	-	0.05	0.20
Carbon tetrafluoride	75-73-0	TAMIS	18000.00	1800.00	-	-	-	-
Tetrahydrofuran	109-99-9	TAMIS	1500.00	150.00	0.01	0.05	-	-
Acid Fluorides	-	-	-	-	-	-	0.06	0.24
Hydrogen Bromide	10035-10-6	TAMIS	100.00	10.00	-	-	-	-
Oxides of Nitrogen	10102-43-9	TAMIS	Must Meet NAAQS	Must Meet NAAQS	-	-	-	-
Carbon Monoxide	630-08-0	TAMIS	Must Meet NAAQS	Must Meet NAAQS	-	-	-	-

PROPOSED EMISSIONS FOR FLORENCE SITE

Pollutant	CAS	ESL Source	Short-Term ESL (µg/m3)	Long-Term ESL (µg/m3)	FUG3-2		FUG3-3	
					(lbs/hr)	(tons/yr)	(lbs/hr)	(tons/yr)
Hydrogen Fluoride	7664-39-3	TAMIS	18.00	8.70	-	-	-	-
Hydrogen Fluoride (Agriculture)	7664-39-3	TAMIS	3.00	0.60	-	-	-	-
Hydrogen Fluoride (Agriculture with Cattle)	7664-39-3	TAMIS	n/a	0.75	-	-	-	-
Difluorine	7782-41-4	TAMIS	2.00	0.20	-	-	-	-
Carbonyl Fluoride	353-50-4	TAMIS	17.00	8.10	-	-	-	-
Carbonyl Fluoride (Agriculture)	353-50-4	TAMIS	2.80	0.57	-	-	-	-
Carbonyl Fluoride (Agriculture with Cattle)	353-50-4	TAMIS	n/a	0.71	-	-	-	-
Acetyl Fluorides	354-34-7	2008 Email	200.00	20.00	-	-	-	-
Trifluoroacetic acid	76-05-1	TAMIS	17.00	8.10	-	-	-	-
Trifluoroacetic acid (Agriculture)	76-05-1	TAMIS	2.80	0.57	-	-	-	-
Trifluoroacetic acid (Agriculture with Cattle)	76-05-1	TAMIS	n/a	0.71	-	-	-	-
Perfluoropentanoyl fluoride	375-62-2	-	-	-	-	-	-	-
Perfluorohexanoyl fluoride	355-38-4	-	-	-	-	-	-	-
Perfluoroheptanoyl fluoride	375-84-8	-	-	-	-	-	-	-
Perfluorooctanoyl Fluoride	335-66-0	-	-	-	-	-	-	-
Perfluorononanoyl fluoride	558-95-2	-	-	-	-	-	-	-
Perfluorodecyl fluoride	594-98-9	2008 Email	200.00	20.00	-	-	-	-
Perfluorosuccinoyl fluoride	679-13-0	-	-	-	-	-	-	-
Hexafluoroglutaroyl fluoride	678-78-4	-	-	-	-	-	-	-
Octafluoroadipoyl fluoride	37881-62-2	-	-	-	-	-	-	-
Perfluorosuberoyl fluoride	24847-09-4	-	-	-	-	-	-	-
Perfluorosebacoyl fluoride	-	-	-	-	-	-	-	-
Perfluorobutoxyethoxyacetyl fluoride	172897-75-5	-	-	-	-	-	-	-
Perfluorotriglycyl Fluoride	24847-19-6	-	-	-	-	-	-	-
Perfluoro-3,6,9-Trioxatridecanoyl Fluoride	883733-06-0	-	-	-	-	-	-	-
Perfluorotetraglycyl Fluoride	24689-56-3	-	-	-	-	-	-	-
Perfluoro-3,6,9-trioxatridecanoic acid	330562-41-9	-	-	-	-	-	-	-
Perfluoropolyethylene Glycol Glycyl fluoride	-	-	-	-	-	-	-	-
Perfluoropolytrimethylene acyl fluoride	-	-	-	-	-	-	-	-
Perfluoropolytetramethylene acyl fluoride	-	-	-	-	-	-	-	-
Perfluoropolydioxolane diacyl fluoride	-	-	-	-	-	-	-	-
Perfluorocyclohexyl carbonyl fluoride	6588-83-2	-	-	-	-	-	-	-
Perfluoropolyethylene Glycol Diol	-	-	-	-	-	-	-	-
Perfluoropolydioxolane Diol	-	-	-	-	-	-	5.4E-03	0.02
Perfluoro (polyethylene glycol) diacid fluoride	-	-	-	-	-	-	-	-
Perfluoro (polytrimethylene glycol) diacid fluoride	-	-	-	-	-	-	-	-
Perfluoro (polytetramethylene glycol) diacid fluoride	-	-	-	-	-	-	-	-
Perfluoropolydioxolane Diacid fluoride	882695-72-9	-	-	-	-	-	-	-
Tetrachlorohexafluorobutane	375-34-8	-	-	-	-	-	-	-
Pentachloropentafluorobutane	375-46-2	-	-	-	-	-	-	-
Hexachlorotetrafluorobutane	375-49-5	-	-	-	-	-	-	-
Perfluoro (bis-2-chloroethoxy methane)	130085-19-7	2008 Email	200.00	20.00	-	-	-	-
Perfluoropentane	678-26-2	-	-	-	-	-	-	-
Perfluorohexane	355-42-0	TAMIS	10000.00	1000.00	-	-	-	-
Perfluoroheptane	335-57-9	TAMIS	200.00	20.00	-	-	-	-
Perfluorooctane	307-34-6	2008 Email	20000.00	2000.00	-	-	-	-
Perfluorononane	375-96-2	-	-	-	-	-	-	-
Perfluorotridecane	376-03-4	-	-	-	-	-	-	-
Perfluoropentadecane	2264-03-1	-	-	-	-	-	-	-
Perfluorodecalin	306-94-5	2008 Email	200.00	20.00	-	-	-	-
Perfluoroperhydrophenanthrene	306-91-2	-	-	-	-	-	-	-
Perfluoromethyldecalin	306-92-3	-	-	-	-	-	-	-
Perfluorodimethylcyclohexane	306-98-9	-	-	-	-	-	-	-
Perfluoroperhydrofluorene	307-08-4	-	-	-	-	-	-	-
Perfluorodisopropylcyclohexane	75169-51-6	-	-	-	-	-	-	-
Perfluorooctyl bromide	423-55-2	-	-	-	-	-	-	-
Methyl perfluoropentanoate	13038-26-1	-	-	-	-	-	-	-
Methyl perfluorohexanoate	424-18-0	-	-	-	-	-	-	-
Methyl perfluoroheptanoate	14312-89-1	-	-	-	-	-	-	-
Methyl perfluorooctanoate	376-27-2	-	-	-	-	-	-	-
Methyl perfluorononanoate	51502-45-5	-	-	-	-	-	-	-
Methyl perfluorodecanoate	307-79-7	-	-	-	-	-	-	-
Methyl perfluorododecanoate	56554-52-0	-	-	-	-	-	-	-
Methyl perfluorotetradecanoate	203302-99-2	-	-	-	-	-	-	-
Methyl perfluorohexadecanoate	165457-57-8	-	-	-	-	-	-	-
Dimethyl perfluorosuccinate	358-36-5	-	-	-	6.9E-03	0.03	-	-
Dimethyl perfluoroglutarate	1513-62-8	-	-	-	-	-	-	-
Dimethyl perfluoroadipate	3107-98-0	-	-	-	-	-	-	-
Dimethyl perfluoro-3,6-dioxaoctane-1,8-dioate	24647-20-9	-	-	-	-	-	-	-
Methyl perfluoro-3,6,9-trioxadecanoate	169289-58-1	-	-	-	-	-	-	-
Dimethyl perfluorosuberate	2062-20-6	-	-	-	-	-	-	-
Dimethyl perfluoro-3,6,9-trioxaundecane-1,11-dioate	35910-59-9	-	-	-	-	-	-	-
Methyl perfluoro-3,6-dioxadecanoate	129301-40-2	-	-	-	-	-	-	-
Dimethyl perfluoroazelate	2216-80-1	-	-	-	-	-	-	-
Dimethyl perfluorosebacate	4590-24-3	-	-	-	-	-	-	-
Methyl perfluoroundecanoate	203302-98-1	-	-	-	-	-	-	-
Dimethyl perfluoro-1,12-decanedioate	84750-88-9	-	-	-	-	-	-	-

PROPOSED EMISSIONS FOR FLORENCE SITE

Pollutant	CAS	ESL Source	Short-Term ESL (µg/m3)	Long-Term ESL (µg/m3)	FUG3-2		FUG3-3	
					(lbs/hr)	(tons/yr)	(lbs/hr)	(tons/yr)
Perfluoropolyethylene	-	-	-	-	-	-	-	-
Methanol	67-56-1	TAMIS	3900.00	2100.00	-	-	-	-
Methyl perfluoro-3,6-dioxahexanoate	39187-41-2	-	-	-	-	-	-	-
Methyl perfluoro-3,6,9-trioxadecanoate	330562-42-0	-	-	-	-	-	-	-
Isopropyl Alcohol	67-63-0	TAMIS	4920.00	492.00	-	-	-	-
1H,1H-Perfluoro-1-pentanol	355-28-2	-	-	-	-	-	-	-
1H,1H-Perfluoro-1-hexanol	423-46-1	-	-	-	-	-	-	-
1H,1H-Perfluoro-1-heptanol	375-82-6	-	-	-	-	-	-	-
1H,1H-Perfluoro-1-octanol	307-30-2	-	-	-	-	-	-	-
1H,1H-Perfluoro-1-nonanol	423-56-3	-	-	-	-	-	-	-
1H,1H-Perfluoro-1-decanol	307-37-9	-	-	-	-	-	-	-
1H,1H-Perfluoro-1-undecanol	307-46-0	-	-	-	-	-	-	-
1H,1H-Perfluoro-1-dodecanol	423-65-4	-	-	-	-	-	-	-
1H,1H-Perfluoro-1-tetradecanol	15622-57-8	-	-	-	-	-	-	-
Perfluoro-3,7-dimethyloctan-1-ol	232587-50-7	-	-	-	-	-	-	-
1H,1H,4H,4H-Perfluoro-1,4-butanediol	425-61-6	-	-	-	-	-	-	-
1H,1H,5H,5H-Perfluoro-1,5-pentanediol	376-90-9	-	-	-	-	-	-	-
1H,1H,6H,6H-Perfluoro-1,6-hexanediol	355-74-8	-	-	-	-	-	-	-
1H,1H,8H,8H-Perfluoro-1,8-octanediol	90177-98-1	-	-	-	-	-	-	-
1H,1H,9H,9H-Perfluoro-1,9-nonanediol	203303-01-9	-	-	-	-	-	-	-
1H,1H,10H,10H-Perfluoro-1,10-decanediol	754-96-1	-	-	-	-	-	-	-
1H,1H,12H,12H-Perfluoro-1,12-dodecanediol	183162-43-8	-	-	-	-	-	-	-
Perfluoro-tert-butanol	2378-02-1	2008 Email	1000.00	100.00	-	-	-	-
Fluorinated diethylene glycol monomethyl ether	330562-43-1	-	-	-	-	-	-	-
Fluorinated triethylene glycol monomethyl ether	147492-57-7	-	-	-	-	-	-	-
Fluorinated diethylene glycol monobutyl ether	152914-73-3	-	-	-	-	-	-	-
Fluorinated triethylene glycol monobutyl ether	317817-24-6	-	-	-	-	-	-	-
Fluorinated triethylene glycol	129301-42-4	-	-	-	-	-	-	-
Fluorinated tetraethylene glycol	330562-44-2	-	-	-	-	-	-	-
Perfluoropentanoic acid	2706-90-3	-	-	-	-	-	-	-
Perfluorohexanoic acid	307-24-4	-	-	-	-	-	-	-
Perfluoroheptanoic acid	375-85-9	-	-	-	-	-	-	-
Perfluorooctanoic acid	335-67-1	TAMIS	0.05	0.01	-	-	-	-
Perfluorononanoic acid	375-95-1	-	-	-	-	-	-	-
Perfluorodecanoic acid	335-76-2	2008 Email	14.00	1.40	-	-	-	-
Perfluoroundecanoic acid	2058-94-8	-	-	-	-	-	-	-
Perfluorododecanoic acid	307-55-1	-	-	-	-	-	-	-
Perfluorododecanedioic acid	865-85-0	-	-	-	-	-	-	-
Perfluorotetradecanoic acid	376-06-7	-	-	-	-	-	-	-
Perfluorohexadecanoic acid	67905-19-5	-	-	-	-	-	-	-
Perfluorosuccinic acid	377-38-8	-	-	-	-	-	-	-
Perfluoroglutaric acid	376-73-8	-	-	-	-	-	-	-
Perfluoro-3,6-dioxahexanoic acid	151772-58-6	-	-	-	-	-	-	-
Perfluoroadipic acid	336-08-3	-	-	-	-	-	-	-
Perfluoro-3,6-dioxaoctane-1,8-dioic acid	55621-21-1	-	-	-	-	-	-	-
Perfluoro-3,6,9-trioxadecanoic acid	151772-59-7	-	-	-	-	-	-	-
Perfluorosuberic acid	678-45-5	-	-	-	-	-	-	-
Perfluoro-3,6-dioxadecanoic acid	137780-69-9	-	-	-	-	-	-	-
Perfluoro-3,6,9-trioxadecane-1,11-dioic acid	55621-18-6	-	-	-	-	-	-	-
Perfluoroazelaic acid	23453-64-7	-	-	-	-	-	-	-
Perfluoro-3,7-dimethyloctanoic acid	172155-07-8	-	-	-	-	-	-	-
Perfluorosebacic acid	307-78-8	-	-	-	-	-	-	-
Bromine	7726-95-6	TAMIS	7.00	0.70	-	-	-	-
Perfluorohexyl bromide	335-56-8	-	-	-	-	-	-	-
Perfluoroheptyl bromide	375-88-2	-	-	-	-	-	-	-
Perfluorononyl bromide	558-96-3	-	-	-	-	-	-	-
Perfluorodecyl bromide	307-43-7	-	-	-	-	-	-	-
Perfluoro-1,4-dibromobutane	335-48-8	-	-	-	-	-	-	-
Perfluoro-1,6-dibromohexane	918-22-9	-	-	-	-	-	-	-
Perfluoro-1,8-dibromooctane	812-58-8	-	-	-	-	-	-	-
Perfluoro-2,5,8-trioxanonyl bromide	330562-45-3	-	-	-	-	-	-	-
Perfluoro-2,5-dioxanonyl bromide	330562-46-4	-	-	-	-	-	-	-
Perfluoro-2,5,8-trioxadodecyl bromide	330562-47-5	-	-	-	-	-	-	-
Perfluoro-1,6-dibromo-2,5-dioxahexane	330562-48-6	-	-	-	-	-	-	-
Perfluoro-1,9-dibromo-2,5,8-trioxanonane	330562-49-7	-	-	-	-	-	-	-
polymers of chlorotrifluoroethylene (PCTFE)	9002-83-9	2008 Email	1000.00	100.00	-	-	-	-
Toluene	108-88-3	TAMIS	4500.00	1200.00	-	-	-	-
Butylated Hydroxytoluene	128-37-0	TAMIS	Must Meet NAAQS	Must Meet NAAQS	-	-	-	-
PDO Diol	-	-	-	-	-	-	-	-
Perfluorosuccinic anhydride	699-30-9	-	-	-	-	-	-	-
Perfluoroglutaric anhydride	376-68-1	-	-	-	-	-	-	-
Acrylic Acid	79-10-7	TAMIS	60.00	6.00	-	-	-	-
1H,1H-Perfluoro-n-octyl acrylate	307-98-2	-	-	-	-	-	-	-
1H,1H-Perfluoro-n-decyl acrylate	335-83-1	-	-	-	-	-	-	-
1H,1H-Perfluoro-n-octyl methacrylate	3934-23-4	-	-	-	-	-	-	-
1H,1H-Perfluoro-n-decyl methacrylate	23069-32-1	-	-	-	-	-	-	-

PROPOSED EMISSIONS FOR FLORENCE SITE

Pollutant	CAS	ESL Source	Short-Term ESL (µg/m3)	Long-Term ESL (µg/m3)	FUG3-2		FUG3-3	
					(lbs/hr)	(tons/yr)	(lbs/hr)	(tons/yr)
1H,1H,6H,6H-Perfluoro-1,6-hexanediol diacrylate	2264-01-9	-	-	-	-	-	-	-
Perfluoro-[15]-crown-5 ether	97571-69-2	-	-	-	-	-	-	-
Fluorinated PTMG 250 Diol	146191-87-9	-	-	-	-	-	-	-
Hydrogen Chloride	7647-01-0	TAMIS	190.00	7.90	7.5E-03	0.03	3.6E-03	0.02
Fluorinated Poly (Trimethylene Glycol)	-	-	-	-	-	-	-	-
Tetraethylene glycol dimethyl ether	143-24-8	-	-	-	-	-	-	-
Perfluoro(Diethylene Glycol Monoisobutyl Ether)	1423231-12-2	-	-	-	-	-	-	-
Perfluorocyclohexyl methanol	28788-68-3	-	-	-	-	-	-	-
Perfluoro(Polyethylene Glycol 400)-CH2OH terminated	146222-54-0	-	-	-	-	-	-	-
Ethyl acetate	141-78-6	TAMIS	3100.00	1440.00	8.1E-03	0.04	-	-
Perfluoro-t-butylcyclohexane	84808-64-0	2008 Email	200.00	20.00	-	-	-	-
1,1,2-Trichloro-1,2,2-trifluoroethane	76-13-1	TAMIS	38000.00	3800.00	-	-	-	-
Perfluorobutryl Fluoride	335-42-2	-	-	-	-	-	-	-
Perfluoropropane	76-19-7	TAMIS	10000.00	1000.00	-	-	-	-
Carbon tetrafluoride	75-73-0	TAMIS	18000.00	1800.00	-	-	-	-
Tetrahydrofuran	109-99-9	TAMIS	1500.00	150.00	0.02	0.07	0.02	0.10
Acid Fluorides	-	-	-	-	-	-	-	-
Hydrogen Bromide	10035-10-6	TAMIS	100.00	10.00	-	-	-	-
Oxides of Nitrogen	10102-43-9	TAMIS	Must Meet NAAQS	Must Meet NAAQS	-	-	-	-
Carbon Monoxide	630-08-0	TAMIS	Must Meet NAAQS	Must Meet NAAQS	-	-	-	-

PROPOSED EMISSIONS FOR FLORENCE SITE

Pollutant	CAS	ESL Source	Short-Term ESL (µg/m3)	Long-Term ESL (µg/m3)	FUG3-4		FUG3-5	
					(lbs/hr)	(tons/yr)	(lbs/hr)	(tons/yr)
Hydrogen Fluoride	7664-39-3	TAMIS	18.00	8.70	-	-	-	-
Hydrogen Fluoride (Agriculture)	7664-39-3	TAMIS	3.00	0.60	-	-	-	-
Hydrogen Fluoride (Agriculture with Cattle)	7664-39-3	TAMIS	n/a	0.75	-	-	-	-
Difluorine	7782-41-4	TAMIS	2.00	0.20	-	-	-	-
Carbonyl Fluoride	353-50-4	TAMIS	17.00	8.10	-	-	-	-
Carbonyl Fluoride (Agriculture)	353-50-4	TAMIS	2.80	0.57	-	-	-	-
Carbonyl Fluoride (Agriculture with Cattle)	353-50-4	TAMIS	n/a	0.71	-	-	-	-
Acetyl Fluorides	354-34-7	2008 Email	200.00	20.00	-	-	-	-
Trifluoroacetic acid	76-05-1	TAMIS	17.00	8.10	-	-	-	-
Trifluoroacetic acid (Agriculture)	76-05-1	TAMIS	2.80	0.57	-	-	-	-
Trifluoroacetic acid (Agriculture with Cattle)	76-05-1	TAMIS	n/a	0.71	-	-	-	-
Perfluoropentanoyl fluoride	375-62-2	-	-	-	-	-	-	-
Perfluorohexanoyl fluoride	355-38-4	-	-	-	-	-	-	-
Perfluoroheptanoyl fluoride	375-84-8	-	-	-	-	-	-	-
Perfluorooctanoyl fluoride	335-66-0	-	-	-	-	-	-	-
Perfluorononanoyl fluoride	558-95-2	-	-	-	-	-	-	-
Perfluorodecyl fluoride	594-98-9	2008 Email	200.00	20.00	-	-	-	-
Perfluorosuccinoyl fluoride	679-13-0	-	-	-	-	-	-	-
Hexafluoroglutaryl fluoride	678-78-4	-	-	-	-	-	-	-
Octafluoroadipoyl fluoride	37881-62-2	-	-	-	-	-	-	-
Perfluorosuberoyl fluoride	24647-09-4	-	-	-	-	-	-	-
Perfluorosebacoyl fluoride	-	-	-	-	-	-	-	-
Perfluorobutoxyethoxyacetyl fluoride	172897-75-5	-	-	-	-	-	-	-
Perfluorotriglycyl fluoride	24647-19-6	-	-	-	-	-	-	-
Perfluoro-3,6,9-trioxatridecanoil fluoride	883733-06-0	-	-	-	-	-	-	-
Perfluorotetraglycyl fluoride	24689-56-3	-	-	-	-	-	-	-
Perfluoro-3,6,9-trioxatridecanoic acid	330562-41-9	-	-	-	-	-	-	-
Perfluoropolyethylene Glycol Glycyl fluoride	-	-	-	-	-	-	-	-
Perfluoropolytrimethylene acyl fluoride	-	-	-	-	-	-	-	-
Perfluoropolytetramethylene acyl fluoride	-	-	-	-	-	-	-	-
Perfluoropolydioxolane diacyl fluoride	-	-	-	-	-	-	-	-
Perfluorocyclohexyl carbonyl fluoride	6588-63-2	-	-	-	-	-	-	-
Perfluoropolyethylene Glycol Diol	-	-	-	-	-	-	-	-
Perfluoropolydioxolane Diol	-	-	-	-	-	-	-	-
Perfluoro (polyethylene glycol) diacid fluoride	-	-	-	-	-	-	-	-
Perfluoro (polytrimethylene glycol) diacid fluoride	-	-	-	-	-	-	-	-
Perfluoro (polytetramethylene glycol) diacid fluoride	-	-	-	-	-	-	-	-
Perfluoropolydioxolane Diacid fluoride	882695-72-9	-	-	-	-	-	-	-
Tetrachlorohexafluorobutane	375-34-8	-	-	-	-	-	-	-
Pentachloropentafluorobutane	375-46-2	-	-	-	-	-	-	-
Hexachlorotetrafluorobutane	375-49-5	-	-	-	-	-	-	-
Perfluoro (bis-2-chloroethoxy methane)	130085-19-7	2008 Email	200.00	20.00	-	-	-	-
Perfluoropentane	678-26-2	-	-	-	-	-	-	-
Perfluorohexane	355-42-0	TAMIS	10000.00	1000.00	-	-	-	-
Perfluoroheptane	335-57-9	TAMIS	200.00	20.00	-	-	-	-
Perfluorooctane	307-34-6	2008 Email	20000.00	2000.00	-	-	-	-
Perfluorononane	375-96-2	-	-	-	-	-	-	-
Perfluorotridecane	376-03-4	-	-	-	-	-	-	-
Perfluoropentadecane	2264-03-1	-	-	-	-	-	-	-
Perfluorodecalin	306-94-5	2008 Email	200.00	20.00	-	-	-	-
Perfluoroperhydrophenanthrene	306-91-2	-	-	-	-	-	-	-
Perfluoromethyldecalin	306-92-3	-	-	-	-	-	-	-
Perfluorodimethylcyclohexane	306-98-9	-	-	-	-	-	-	-
Perfluoroperhydrofluorene	307-08-4	-	-	-	-	-	-	-
Perfluorodisopropylcyclohexane	75169-51-6	-	-	-	-	-	-	-
Perfluorooctyl bromide	423-55-2	-	-	-	-	-	-	-
Methyl perfluoropentanoate	13038-26-1	-	-	-	-	-	-	-
Methyl perfluorohexanoate	424-18-0	-	-	-	-	-	-	-
Methyl perfluoroheptanoate	14312-89-1	-	-	-	-	-	-	-
Methyl perfluorooctanoate	376-27-2	-	-	-	-	-	-	-
Methyl perfluorononanoate	51502-45-5	-	-	-	-	-	-	-
Methyl perfluorodecanoate	307-79-7	-	-	-	-	-	-	-
Methyl perfluorododecanoate	56554-52-0	-	-	-	-	-	-	-
Methyl perfluorotetradecanoate	203302-99-2	-	-	-	-	-	-	-
Methyl perfluorohexadecanoate	165457-57-8	-	-	-	-	-	-	-
Dimethyl perfluorosuccinate	356-36-5	-	-	-	-	-	-	-
Dimethyl perfluoroglutarate	1513-62-8	-	-	-	-	-	-	-
Dimethyl perfluoro adipate	3107-98-0	-	-	-	-	-	-	-
Dimethyl perfluoro-3,6-dioxoactane-1,8-dioate	24647-20-9	-	-	-	-	-	-	-
Methyl perfluoro-3,6,9-trioxadecanoate	169289-58-1	-	-	-	-	-	-	-
Dimethyl perfluorosuberate	2062-20-6	-	-	-	-	-	-	-
Dimethyl perfluoro-3,6,9-trioxaundecane-1,11-dioate	35910-59-9	-	-	-	-	-	-	-
Methyl perfluoro-3,6-dioxadecanoate	129301-40-2	-	-	-	-	-	-	-
Dimethyl perfluoroazelate	2216-90-1	-	-	-	-	-	-	-
Dimethyl perfluorosebacate	4590-24-3	-	-	-	-	-	-	-
Methyl perfluoroundecanoate	203302-98-1	-	-	-	-	-	-	-
Dimethyl perfluoro-1,12-decanedioate	84750-88-9	-	-	-	-	-	-	-

PROPOSED EMISSIONS FOR FLORENCE SITE

Pollutant	CAS	ESL Source	Short-Term ESL (µg/m3)	Long-Term ESL (µg/m3)	FUG3-4		FUG3-5	
					(lbs/hr)	(tons/yr)	(lbs/hr)	(tons/yr)
Perfluoropolyethylene	-	-	-	-	-	-	-	-
Methanol	67-56-1	TAMIS	3900.00	2100.00	-	-	-	-
Methyl perfluoro-3,6-dioxahexanoate	39187-41-2	-	-	-	-	-	-	-
Methyl perfluoro-3,6,9-trioxatridecanoate	330562-42-0	-	-	-	-	-	-	-
Isopropyl Alcohol	67-63-0	TAMIS	4920.00	492.00	-	-	-	-
1H,1H-Perfluoro-1-pentanol	355-28-2	-	-	-	-	-	-	-
1H,1H-Perfluoro-1-hexanol	423-46-1	-	-	-	-	-	-	-
1H,1H-Perfluoro-1-heptanol	375-82-6	-	-	-	-	-	-	-
1H,1H-Perfluoro-1-octanol	307-30-2	-	-	-	-	-	-	-
1H,1H-Perfluoro-1-nonanol	423-56-3	-	-	-	-	-	-	-
1H,1H-Perfluoro-1-decanol	307-37-9	-	-	-	-	-	-	-
1H,1H-Perfluoro-1-undecanol	307-46-0	-	-	-	-	-	-	-
1H,1H-Perfluoro-1-dodecanol	423-65-4	-	-	-	-	-	-	-
1H,1H-Perfluoro-1-tetradecanol	15622-57-8	-	-	-	-	-	-	-
Perfluoro-3,7-dimethyloctan-1-ol	232587-50-7	-	-	-	-	-	-	-
1H,1H,4H,4H-Perfluoro-1,4-butanediol	425-61-6	-	-	-	-	-	-	-
1H,1H,5H,5H-Perfluoro-1,5-pentanediol	376-90-9	-	-	-	-	-	-	-
1H,1H,6H,6H-Perfluoro-1,6-hexanediol	355-74-8	-	-	-	-	-	-	-
1H,1H,8H,8H-Perfluoro-1,8-octanediol	90177-96-1	-	-	-	-	-	-	-
1H,1H,9H,9H-Perfluoro-1,9-nonanediol	203303-01-9	-	-	-	-	-	-	-
1H,1H,10H,10H-Perfluoro-1,10-decanediol	754-96-1	-	-	-	-	-	-	-
1H,1H,12H,12H-Perfluoro-1,12-dodecanediol	183162-43-8	-	-	-	-	-	-	-
Perfluoro-tert-butanol	2378-02-1	2008 Email	1000.00	100.00	-	-	-	-
Fluorinated diethylene glycol monomethyl ether	330562-43-1	-	-	-	-	-	-	-
Fluorinated triethylene glycol monomethyl ether	147492-57-7	-	-	-	-	-	-	-
Fluorinated diethylene glycol monobutyl ether	152914-73-3	-	-	-	-	-	-	-
Fluorinated triethylene glycol monobutyl ether	317817-24-6	-	-	-	-	-	-	-
Fluorinated triethylene glycol	129301-42-4	-	-	-	-	-	-	-
Fluorinated tetraethylene glycol	330562-44-2	-	-	-	-	-	-	-
Perfluoropentanoic acid	2706-90-3	-	-	-	-	-	-	-
Perfluorohexanoic acid	307-24-4	-	-	-	-	-	-	-
Perfluoroheptanoic acid	375-85-9	-	-	-	-	-	-	-
Perfluorooctanoic acid	335-67-1	TAMIS	0.05	0.01	-	-	-	-
Perfluorononanoic acid	375-95-1	-	-	-	-	-	-	-
Perfluorodecanoic acid	335-76-2	2008 Email	14.00	1.40	-	-	-	-
Perfluoroundecanoic acid	2059-94-8	-	-	-	-	-	-	-
Perfluorododecanoic acid	307-55-1	-	-	-	-	-	-	-
Perfluorododecanedioic acid	865-85-0	-	-	-	-	-	-	-
Perfluorotetradecanoic acid	376-06-7	-	-	-	-	-	-	-
Perfluorohexadecanoic acid	67905-19-5	-	-	-	-	-	-	-
Perfluorosuccinic acid	377-38-8	-	-	-	-	-	-	-
Perfluoroglutaric acid	376-73-8	-	-	-	-	-	-	-
Perfluoro-3,6-dioxahexanoic acid	151772-58-6	-	-	-	-	-	-	-
Perfluoroadipic acid	336-08-3	-	-	-	-	-	-	-
Perfluoro-3,6-dioxaoctane-1,8-dioic acid	55621-21-1	-	-	-	-	-	-	-
Perfluoro-3,6,9-trioxadecanoic acid	151772-59-7	-	-	-	-	-	-	-
Perfluorosuberic acid	678-45-5	-	-	-	-	-	-	-
Perfluoro-3,6-dioxadecanoic acid	137780-69-9	-	-	-	-	-	-	-
Perfluoro-3,6,9-trioxaundecane-1,11-dioic acid	55621-18-6	-	-	-	-	-	-	-
Perfluoroazelaic acid	23453-64-7	-	-	-	-	-	-	-
Perfluoro-3,7-dimethyloctanoic acid	172155-07-8	-	-	-	-	-	-	-
Perfluorosebacic acid	307-78-8	-	-	-	-	-	-	-
Bromine	7726-95-6	TAMIS	7.00	0.70	-	-	-	-
Perfluorohexyl bromide	335-56-8	-	-	-	-	-	-	-
Perfluoroheptyl bromide	375-88-2	-	-	-	-	-	-	-
Perfluorononyl bromide	558-96-3	-	-	-	-	-	-	-
Perfluorodecyl bromide	307-43-7	-	-	-	-	-	-	-
Perfluoro-1,4-dibromobutane	335-48-8	-	-	-	-	-	-	-
Perfluoro-1,6-dibromohexane	918-22-9	-	-	-	-	-	-	-
Perfluoro-1,8-dibromooctane	812-58-8	-	-	-	-	-	-	-
Perfluoro-2,5,8-trioxanonyl bromide	330562-45-3	-	-	-	-	-	-	-
Perfluoro-2,5-dioxanononyl bromide	330562-46-4	-	-	-	-	-	-	-
Perfluoro-2,5,8-trioxadodecyl bromide	330562-47-5	-	-	-	-	-	-	-
Perfluoro-1,6-dibromo-2,5-dioxahexane	330562-48-6	-	-	-	-	-	-	-
Perfluoro-1,9-dibromo-2,5,8-trioxanonane	330562-49-7	-	-	-	-	-	-	-
polymers of chlorotrifluoroethylene (PCTFE)	9002-83-9	2008 Email	1000.00	100.00	-	-	-	-
Toluene	108-88-3	TAMIS	4500.00	1200.00	-	-	-	-
Butylated Hydroxytoluene	128-37-0	TAMIS	Must Meet NAAQS	Must Meet NAAQS	-	-	-	-
PDO Diol	-	-	-	-	-	-	-	-
Perfluorosuccinic anhydride	699-30-9	-	-	-	-	-	-	-
Perfluoroglutaric anhydride	376-68-1	-	-	-	-	-	-	-
Acrylic Acid	79-10-7	TAMIS	60.00	6.00	-	-	-	-
1H,1H-Perfluoro-n-octyl acrylate	307-98-2	-	-	-	-	-	-	-
1H,1H-Perfluoro-n-decyl acrylate	335-83-1	-	-	-	-	-	-	-
1H,1H-Perfluoro-n-octyl methacrylate	3934-23-4	-	-	-	-	-	-	-
1H,1H-Perfluoro-n-decyl methacrylate	23069-32-1	-	-	-	-	-	-	-

PROPOSED EMISSIONS FOR FLORENCE SITE

Pollutant	CAS	ESL Source	Short-Term ESL ($\mu\text{g}/\text{m}^3$)	Long-Term ESL ($\mu\text{g}/\text{m}^3$)	FUG3-4		FUG3-5	
					(lbs/hr)	(tons/yr)	(lbs/hr)	(tons/yr)
1H,1H,6H,6H-Perfluoro-1,6-hexanediol diacrylate	2264-01-9	-	-	-	-	-	-	-
Perfluoro-[15]-crown-5 ether	97571-69-2	-	-	-	-	-	-	-
Fluorinated PTMG 250 Diol	146191-87-9	-	-	-	3.5E-03	0.02	-	-
Hydrogen Chloride	7647-01-0	TAMIS	190.00	7.90	3.1E-03	0.01	-	-
Fluorinated Poly (Trimethylene Glycol)	-	-	-	-	3.5E-03	0.02	-	-
Tetraethylene glycol dimethyl ether	143-24-8	-	-	-	9.6E-03	0.04	-	-
Perfluoro(Diethylene Glycol Monoisobutyl Ether)	1423231-12-2	-	-	-	9.5E-03	0.04	-	-
Perfluorocyclohexyl methanol	28788-68-3	-	-	-	8.8E-03	0.04	-	-
Perfluoro(Polyethylene Glycol 400)-CH2OH terminated	146222-54-0	-	-	-	4.1E-03	0.02	-	-
Ethyl acetate	141-78-6	TAMIS	3100.00	1440.00	-	-	-	-
Perfluoro-t-butylcyclohexane	84808-64-0	2008 Email	200.00	20.00	-	-	-	-
1,1,2-Trichloro-1,2,2-trifluoroethane	76-13-1	TAMIS	38000.00	3800.00	-	-	-	-
Perfluorobutyl Fluoride	335-42-2	-	-	-	-	-	-	-
Perfluoropropane	76-19-7	TAMIS	10000.00	1000.00	-	-	-	-
Carbon tetrafluoride	75-73-0	TAMIS	18000.00	1800.00	-	-	-	-
Tetrahydrofuran	109-89-9	TAMIS	1500.00	150.00	0.02	0.08	4.3E-07	1.9E-06
Acid Fluorides	-	-	-	-	-	-	-	-
Hydrogen Bromide	10035-10-6	TAMIS	100.00	10.00	-	-	-	-
Oxides of Nitrogen	10102-43-9	TAMIS	Must Meet NAAQS	Must Meet NAAQS	-	-	-	-
Carbon Monoxide	630-08-0	TAMIS	Must Meet NAAQS	Must Meet NAAQS	-	-	-	-

Modeling Inputs - Point Source Parameters

FIN	EPN	Description	Modeling		UTM		Elevation		Release Height		Diameter		Velocity		Temp	
			EPN	Zone	East	North	(m)	(m)	(ft)	(m)	(ft)	(m)	(ft)	(m/s)	(ft/s)	(°F)
EP3-1	EP3-1	Exhaust Gas Vent System (w/ Raincap)	EP31	14	604,666	3,407,123	332	40.0	12.19	0.50	0.1524	7.266	2.2147	80.0	299.8	

Modeling Inputs - Volume Source Parameters

FIN	EPN	Description	Modeling		UTM		Elevation		Vol. Side Length		Building Height		Release Height (H)		σ _{z0}		Volume Source Type
			EPN	Zone	East	North	(m)	(m)	(ft)	(m)	(ft)	(m)	(ft)	(m)	(m)		
EP3-2	EP3-2	Washing Reactor 1	EP32	14	604,670	3,407,115	332	1.50	0.46	30.0	9.1	4.50	1.37	0.106	4.253	Elevated Adjacent to Structure	
EP3-3	EP3-3	Washing Reactor 2	EP33	14	604,669	3,407,117	332	1.83	0.56	30.0	9.1	4.50	1.37	0.130	4.253	Elevated Adjacent to Structure	
FUG3-1	FUG3-1	Building 3 Fugitives	FUG31	14	604,691	3,407,124	332	120.0	36.58	30.0	9.1	10.0	3.05	8.506	4.253	Elevated Adjacent to Structure	
FUG3-2	FUG3-2	Reduction Reactor 1 Fug	FUG32	14	604,675	3,407,111	332	3.28	1.00	30.0	9.1	3.28	1.00	0.233	4.253	Elevated Adjacent to Structure	
FUG3-3	FUG3-3	Reduction Reactor 2 Fug	FUG33	14	604,673	3,407,112	332	3.28	1.00	30.0	9.1	4.17	1.27	0.233	4.253	Elevated Adjacent to Structure	
FUG3-4	FUG3-4	Reduction Reactor 3 Fug	FUG34	14	604,672	3,407,114	332	3.28	1.00	30.0	9.1	3.28	1.00	0.233	4.253	Elevated Adjacent to Structure	

APPENDIX B

DISASTER REVIEW

Exflur has determined that Hydrogen fluoride (HF) requires a disaster review. In the event that an emergency response is needed, the site would be evacuated. Also, an assessment would be made by the Environmental, Health and Safety (EHS) Manager and Facility Supervisor to determine whether Exflur is capable of internally responding to control the hazardous release.

Exflur has a minimum of four personnel that are United States Occupational Safety and Health Administration (OSHA) Hazardous Waste Operations and Emergency Response (HAZWOPER) trained: 2 for the Entry Team and 2 for a Backup Team. If the EHS Manager and Facility Supervisor determine Exflur is capable of internally responding to the control the hazardous release, the Entry Team will enter the contaminated area to properly control the release and to perform clean up procedures. The Backup Team will be away from the contamination in the event that a rescue is needed. If the emergency response exceeds the capabilities of Exflur, local authorities will be contacted for assistance.

In case a release has occurred, Exflur will notify the National Response Center (NRC Reporting), the State Emergency Response Commission aka Texas Division of Emergency Management (SERC Reporting), and the Local Emergency Planning Committee of Williamson County to report the release.

Hydrogen Fluoride

Physical Characteristics:

	Hydrogen Fluoride
Chemical formula	HF
Molecular weight	20.01 g/mol
Vapor Pressure (psia at 68°F)	0.5 (psig)
Vapor specific gravity (relative to air) at 68°F and at the disaster release temperature	0.991 @ 68
Initial boiling point (°F)	20°C (68°F)
Material Safety Data Sheet (MSDS) or Safety Data Sheet (SDS)	Attached

Proposed process features, equipment design, instrumentation, safety redundancies, and operating procedures:

Five (5) HF cylinders are manifolded together to supply HF to the Fluorine Generators (3 purchased HF cylinders and 2 recovered HF cylinder from the HF recovery system). Each Fluorine generator has its own air operated valve that regulates how much HF is supplied to the fluorine generator. It is a normally closed valve and only opens when the fluorine generator calls for more HF. The manifold is constructed of 3/8" stainless steel tubing with Swagelok fittings and Swagelok valves. The only connections that are not Swagelok are the CGA fitting that connects the manifold to the cylinder and the cylinder valve itself.

To minimize the disaster potential, there will be actuated valves that will be connected to our HF monitor that will be able to isolate all the HF Cylinders, therefore reducing our disaster potential to only 1 cylinder.

Worst-Case Disaster Scenario

The worst-case scenario is characterized as a failure of the five HF cylinders as well as failure of all active and passive safety systems with an estimated release from the event of 450 lbs. As detailed in the Risk Management Program (RMP) requirements found in 40 CFR 68.25(c), the release rate is assumed to be the total quantity of the release divided by 10 minutes. This yields a rate of 45 lb/min.

Alternate Emission Release

Per 40 CFR 68.28(b) and EPA guidance, an alternate release scenario for a toxic gas release is characterized as a failure of the one HF cylinders with active and passive safety system properly functioning. The estimated release from this type of event would be approximately 90 lbs.

Active Mitigation Systems: Five (5) HF cylinders are manifolded together to supply HF to the Fluorine Generators. Each Fluorine generator has its own air operated valve that regulates how much HF is supplied to the fluorine generator. It is a normally closed valve and only opens when the fluorine generator calls for more HF. The manifold is constructed of 3/8" stainless steel tubing with Swagelok fittings and Swagelok valves. The only connections that are not Swagelok are the CGA fitting that connects the manifold to the cylinder and the cylinder valve itself. To minimize the disaster potential, there will be actuated valves that will be connected to our HF monitor that will be able to isolate all the HF Cylinders, therefore reducing the disaster potential to only 1 cylinder.

Passive Mitigation Systems: Exflur has an HF sensor to detect HF releases. When the HF sensor detects a release, an alarm is provided to Exflur personnel at the site or to Exflur personnel who are off-site during time periods that Exflur staff are not on site. The off-site personnel can respond within approximately 20 minutes of the alarm. Also, upon detecting an HF release, the HF sensor and alarm system shuts off the building blowers and diverts the air from the area with the release to the Exhaust Gas Vent System Scrubber. The blower for the Exhaust Gas Vent System is turned on during an alarm condition to assist in directing the release through the water scrubber.

Off-Site Consequence Analysis (OCA)

The worst-case release scenario and the alternative release scenario for hydrogen fluoride gas (HF) at the proposed Exflur Florence site are both described above. This section will discuss the off-site consequence analyses prepared for these scenarios. The analysis for both scenarios was performed following the EPA guidance document *Risk Management Program Guidance for Offsite Consequence Analysis* (EPA 550-B-99-009, March 2009)^{1,2}. The modeling tables in the guidance document were used to determine the distance to the toxic endpoint for both scenarios, as described in this section. HF is defined as a regulated toxic substance by §68.130, and can be defined as a dense vapor (HF behaves as dense gas since it is released under pressure) by Exhibit B-1 of the EPA guidance (included at end of this section). That table also states that the endpoint for HF is 0.016 mg/L (20 ppm).

Worst-Case Scenario OCA

Modeling Inputs

A worst-case scenario is defined as the largest possible quantity of a regulated substance from a vessel or process line failure that results in the greatest radial distance to a toxic endpoint, defined in §68.22(a). Per EPA's guidance, the OCA for this scenario contains the model inputs outlined in Table 1 below. Modeling was initially performed in a collaboration between NOAA and the EPA using the RMP*Comp program. The results of this modeling effort were published to standardize the toxic endpoint distance evaluation. As such, many of the items listed in Tables 1 and 2 below are standard for a worst-case scenario and an alternative release scenario.

The modeling tables used to determine the endpoint distance have options for both urban and rural conditions. The rural tables should be used if the site is in an open area with few obstructions whereas the urban tables should be used if the site is in an urban or obstructed area. The urban tables are also appropriate in a remote location if there are many obstructions nearby which would lend to building wake effects, otherwise known as downwash. As shown in the aerial photograph included in Appendix D, the Florence site is located in a rural section of Williamson County with few obstructions in and around the facility which would contribute to wake effects on the dispersing plume. Therefore the rural table was used in this analysis.

As documented above, the worst-case scenario is a release of 450 lb of HF. The worst-case scenario represents an unmitigated release of this toxic gas in the event of the failure of five 90-lb HF cylinders coupled with the failure of all active safety systems currently in place. Therefore, following the guidance from Section 3.1.1 of the EPA document which states that all worst-case scenarios be treated as 10-minute long events, the release rate of this scenario equates to 45 lb/min. Table 1 summarizes the scenario options used in the modeling effort for this worst-case scenario.

1 <https://www.epa.gov/sites/production/files/2013-11/documents/oca-chps.pdf>
2 <https://www.epa.gov/sites/production/files/2017-05/documents/oca-apds.pdf>

Table 1. Modeling Inputs for Worst-Case Scenario Toxic Endpoint Distance Determination

Toxic Endpoint	0.016 mg/L
Gas Density	Dense
Local Conditions	Rural
Total Emissions	450 lb
Emission Release Rate	45 lb/min
Release Time	10 minutes
Release Height	Ground Level, 0 ft
Minimum Wind Speed	1.5 meters/sec
Atmospheric Humidity	50%
Ambient Temperature	25°C / 77°F
Atmospheric Stability Class	F

Endpoint Determination

Generic reference tables to determine the endpoint are provided in the EPA Guidance document. EPA Reference Table 5 specifies the 'Dense Gas Distances to Toxic Endpoint' at a wind speed of 1.5 meters per second and an "F" stability class rating. The release rate for this worst-case scenario as stated above is 45 lb/min. For this release rate in a rural setting, Reference Table 5 identifies the distance to the endpoint to be approximately 3.0 miles.

The affected areas outside of the property includes mostly non-industrial public receptors. The Florence Site is located in a rural area. The land around the facility is used for agricultural purposes like farming and cattle raising. The nearest off-property public receptor (as defined by §68.3) which is a farm is approximately located 0.5 miles away. The plots included in Appendix B show a Google Earth view of the Florence Site, the nearest public receptors, and the radial distance of this worst-case scenario toxic endpoint. The affected area includes private households, public roadways, and some farms.

Alternative Release Scenario OCA

Modeling Inputs

The alternative release scenario is based on the release of 90 pounds of HF from a HF cylinder at the Florence site. Similar to the worst-case scenario OCA, generic dense gas modeling tables were used to find the distances to the toxic endpoint for the alternative release scenario OCA. The release time for the alternative release scenario is estimated to be approximately 10 minutes. A summary of all parameters for the alternative release are presented below in Table 2.

**Table 2. Modeling Inputs for Alternative Release Scenario
 Toxic Endpoint Distance Determination**

Toxic Endpoint	0.016 mg/L
Gas Density	Dense
Local Conditions	Rural
Total Emissions	90 lb
Emission Release Rate	9 lb/min
Release Time	10 minutes
Release Height	Ground Level, 0 ft
Minimum Wind Speed	3.0 meters/sec
Atmospheric Humidity	50%
Ambient Temperature	25°C / 77°F
Atmospheric Stability Class	D

Endpoint Determination

Generic reference tables are provided in the EPA Guidance documents to determine the endpoint. EPA Reference Table 18 specifies the 'Dense Gas Distances to Toxic Endpoint' for a wind speed of 3.0 meters per second and a "D" stability class rating. The release rate for this alternative-case scenario as stated above is 9 lb/min. Reference Table 18 identifies the distance to the endpoint to be approximately 0.4 miles.

Summary of Off-Site Consequence Analysis

The following summarizes information presented above:

Worst-Case Scenario	
Chemical Name	Hydrogen Fluoride (gas)
Wt-% of HF in Mixture	100%
Physical State of HF	Gaseous / Vapor
Model Used	ERPG-2
Scenario	Toxic Gas Release
Quantity Released	450 lbs
Release Rate	45 lbs/min
Release Duration	10 min
Wind Speed	1.5 meter/sec
Atmos. Stability Class	F
Topography	Rural
Distance to Endpoint	3.0 miles
Endpoint Used	0.016 mg/L

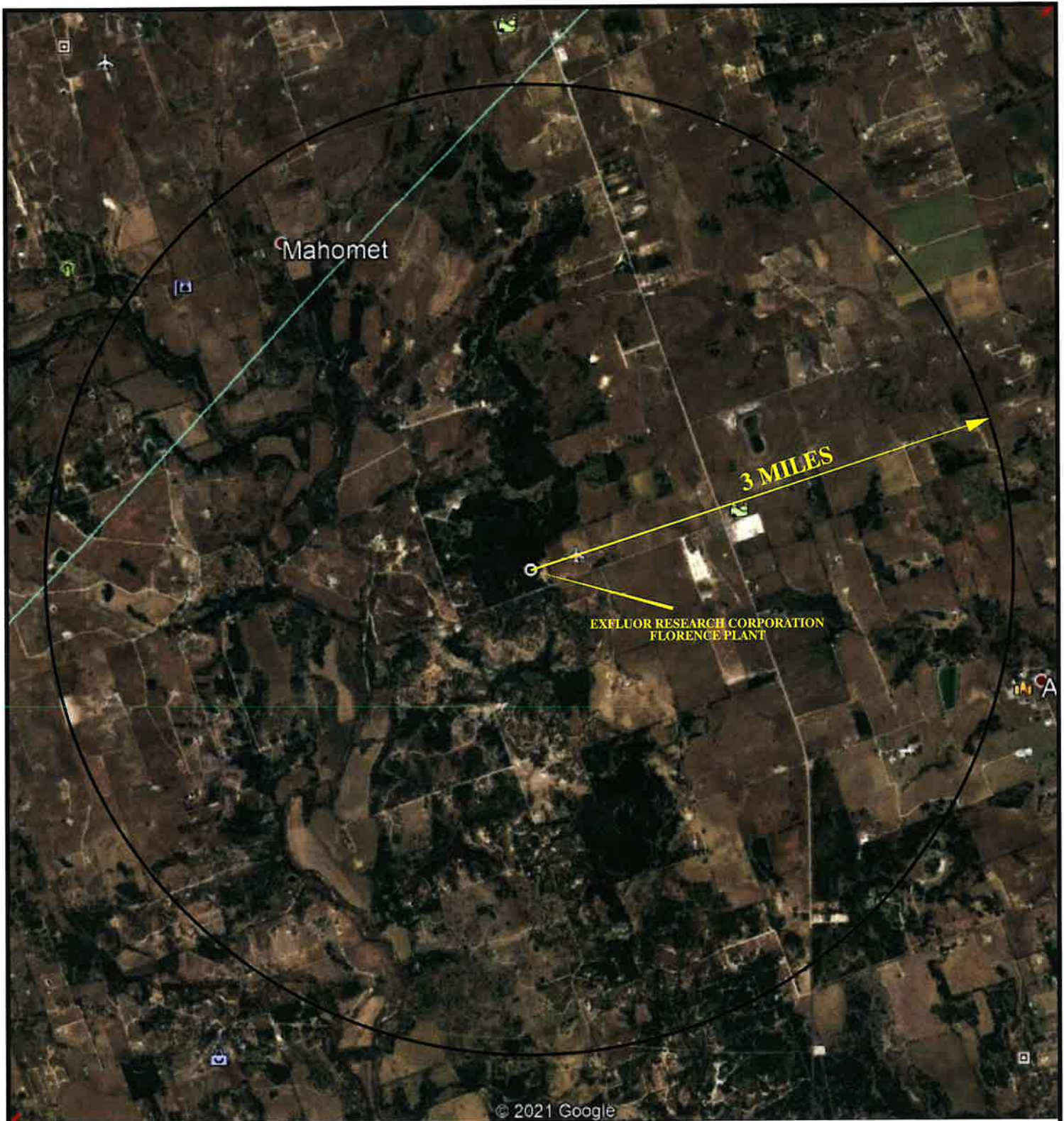
Public Receptors within Distance to Endpoint	Farmland and farms, public roads, private housing
Environmental Receptors within Distance to Endpoint	None
Passive Mitigation Measures Considered	None
Population within Distance to Endpoint	~960 ³ (based on 3.1 mile radius)

Alternative Release Scenario	
Chemical Name	Hydrogen Fluoride (gas)
Wt-% of HF in Mixture	100%
Physical State of HF	Gaseous / Vapor
Model Used	ERPG-2
Scenario	Toxic Gas Release
Quantity Released	90 lb
Quantity Released	9 lb/min
Quantity Released	10 min
Wind Speed	3.0 meter/sec
Atmos. Stability Class	D
Topography	Rural
Distance to Endpoint	0.4 miles
Endpoint Used	0.016 mg/L
Public Receptors within Distance to Endpoint	Farmland and farms, public roads, private housing
Environmental Receptors within Distance to Endpoint	None
Passive Mitigation Measures Considered	None
Active Mitigation Measures Considered	Swagelok fittings and Swagelok valves
Population within Distance to Endpoint	0 (radius does not extend to residential areas)

³ <https://sedac.ciesin.columbia.edu/mapping/popest/pes-v3/>

Fluorine

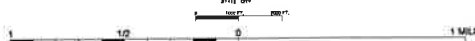
Fluorine does not present a disaster potential at the site. Exfluor will store Fluorine in two 320-gallon tanks. The Fluorine will be stored as a gas at a maximum pressure of 12 psig. Fluorine storage tanks 1 and 2 will be connected. The amount of Fluorine in the lines connecting the tanks together and to the process is considered to be insignificant compared to the amount of Fluorine in the storage tanks. The maximum potential release, based on the combined capacity of storage tanks 1 and 2, is 15.7 lbs. Based on EPA Screen3 dispersion modeling, the maximum ground-level concentration resulting from a release of 15.7 lbs of Fluorine would be approximately 19 ppmv, a concentration that is less than the National Institute for Occupational Safety and Health (NIOSH) published Immediately Dangerous to Life and Health (IDLH) value of 25 ppm for Fluorine. Additionally, the maximum quantity of Fluorine stored at the site, 15.7 lbs, is much less than the 1,000 lb threshold quantity in the U.S. EPA's Chemical Accident Prevention Provisions (Title 40 CFR Part 68, §68.130). Therefore, additional disaster review for Fluorine is not currently considered necessary.



**EXFLUOR RESEARCH CORPORATION
HF Worst-Case Off Site Consequence Analysis**



11°12'N 100°12'W WGS84



WAID ENVIRONMENTAL

EFX14242\AERIALPLOT1.DWG



**EXFLUOR RESEARCH CORPORATION
HF Alternate Release Off Site Consequence Analysis**

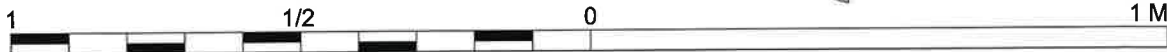


0 1000 FT. 2000 FT.



WAID ENVIRONMENTAL

EFX14242\AERIALAREAPLOT2.DWG



**Exhibit B-1
Data for Toxic Gases**

CAS Number	Chemical Name	Molecular Weight	Ratio of Specific Heats	Toxic Endpoint ^d			Liquid Factor Boiling (LFB)	Density Factor (DF) (Boiling)	Gas Factor (GF) ^k	Vapor Pressure @25 °C (psia)	Reference Table ^h
				mg/L	ppm	Basis					
7664-41-7	Ammonia (anhydrous) ^e	17.03	1.31	0.14	200	ERPG-2	0.073	0.71	14	14.5	Buoyant ^d
7784-42-1	Arsine	77.95	1.28	0.0019	0.6	EHS-LOC (IDLH)	0.23	0.30	30	239	Dense
10294-34-5	Boron trichloride	117.17	1.15	0.010	2	EHS-LOC (Tox ^c)	0.22	0.36	36	22.7	Dense
7637-07-2	Boron trifluoride	67.81	1.20	0.028	10	EHS-LOC (IDLH)	0.25	0.31	28	r	Dense
7782-50-5	Chlorine	70.91	1.32	0.0087	3	ERPG-2	0.19	0.31	29	113	Dense
10049-04-4	Chlorine dioxide	67.45	1.25	0.0028	1	EHS-LOC equivalent (IDLH) ^e	0.15	0.30	28	24.3	Dense
506-77-4	Cyanogen chloride	61.47	1.22	0.030	12	EHS-LOC equivalent (Tox) ^h	0.14	0.41	26	23.7	Dense
19287-45-7	Diborane	27.67	1.17	0.0011	1	ERPG-2	0.13	1.13	17	r	Buoyant ^d
75-21-8	Ethylene oxide	44.05	1.21	0.090	50	ERPG-2	0.12	0.55	22	25.4	Dense
7782-41-4	Fluorine	38.00	1.36	0.0039	2.5	EHS-LOC (IDLH)	0.35	0.32	22	r	Dense
50-00-0	Formaldehyde (anhydrous) ^e	30.03	1.31	0.012	10	ERPG-2	0.10	0.59	19	75.2	Dense
74-90-8	Hydrocyanic acid	27.03	1.30	0.011	10	ERPG-2	0.079	0.72	18	14.8	Buoyant ^d
7647-01-0	Hydrogen chloride (anhydrous) ^f	36.46	1.40	0.030	20	ERPG-2	0.15	0.41	21	684	Dense
7664-39-3	Hydrogen fluoride (anhydrous) ^f	20.01	1.40	0.016	20	ERPG-2	0.066	0.51	16	17.7	Buoyant ^d
7783-07-5	Hydrogen selenide	80.98	1.32	0.00066	0.2	EHS-LOC (IDLH)	0.21	0.25	31	151	Dense
7783-06-4	Hydrogen sulfide	34.08	1.32	0.042	30	ERPG-2	0.13	0.51	20	302	Dense
74-87-3	Methyl chloride	50.49	1.26	0.82	400	ERPG-2	0.14	0.48	24	83.2	Dense
74-93-1	Methyl mercaptan	48.11	1.20	0.049	25	ERPG-2	0.12	0.55	23	29.2	Dense
10102-43-9	Nitric oxide	30.01	1.38	0.031	25	EHS-LOC (TLV) ^g	0.21	0.38	19	r	Dense
75-44-5	Phosgene	98.92	1.17	0.00081	0.2	ERPG-2	0.20	0.35	33	27.4	Dense

April 15, 1999

Reference Table 5
Dense Gas Distances to Toxic Endpoint
10-minute Release, Rural Conditions, F Stability, Wind Speed 1.5 Meters per Second

Release Rate (lbs/min)	Toxic Endpoint (mg/L)																
	Distance (Miles)																
	0.0004	0.0007	0.001	0.002	0.0035	0.005	0.0075	0.01	0.02	0.035	0.05	0.075	0.1	0.25	0.5	0.75	
1	2.2	1.7	1.5	1.1	0.8	0.7	0.5	0.3	0.2	0.2	0.2	0.2	0.1	0.1	0.1	0.1	
2	3.0	2.4	2.1	1.5	1.1	0.9	0.7	0.4	0.3	0.3	0.3	0.2	0.2	0.1	<0.1	<0.1	
5	4.8	3.7	3.0	2.2	1.7	1.5	1.2	1.0	0.7	0.5	0.4	0.3	0.3	0.2	0.1	0.1	
10	6.8	5.0	4.2	3.0	2.4	2.1	1.7	1.4	1.0	0.7	0.6	0.5	0.4	0.2	0.2	0.1	
30	11	8.7	6.8	5.2	3.9	3.4	2.8	2.4	1.7	1.3	1.1	0.9	0.7	0.4	0.3	0.2	
50	14	11	9.3	6.8	5.0	4.2	3.5	3.0	2.2	1.7	1.4	1.1	0.9	0.6	0.4	0.3	
100	19	15	12	8.7	6.8	5.8	4.8	4.2	2.9	2.2	1.9	1.6	1.3	0.8	0.5	0.4	
150	24	18	15	11	8.1	6.8	5.7	5.0	3.6	2.7	2.3	1.9	1.6	0.9	0.6	0.5	
250	>25	22	19	14	11	8.7	7.4	6.2	4.5	3.4	2.8	2.3	2.0	1.2	0.8	0.6	
500	*	>25	>25	19	14	12	9.9	8.7	6.2	4.7	3.8	3.1	2.7	1.6	1.1	0.9	
750	*	*	*	23	17	15	12	11	7.4	5.5	4.5	3.7	3.2	1.9	1.3	1.0	
1,000	*	*	*	>25	20	17	14	12	8.1	6.2	5.2	4.2	3.6	2.2	1.4	1.1	
1,500	*	*	*	*	24	20	16	14	9.9	7.4	6.2	5.0	4.3	2.5	1.7	1.3	
2,000	*	*	*	*	>25	23	19	16	11	8.7	6.8	5.6	4.8	2.9	1.9	1.5	
2,500	*	*	*	*	*	>25	20	18	12	9.3	8.1	6.2	5.3	3.2	2.1	1.6	
3,000	*	*	*	*	*	*	23	20	14	9.9	8.7	6.8	5.6	3.4	2.2	1.7	
4,000	*	*	*	*	*	*	>25	22	16	11	9.3	7.4	6.2	3.8	2.5	2.0	
5,000	*	*	*	*	*	*	*	25	17	13	11	8.7	6.8	4.2	2.7	2.1	
7,500	*	*	*	*	*	*	*	>25	20	15	12	9.9	8.7	4.9	3.2	2.5	
10,000	*	*	*	*	*	*	*	*	24	17	14	11	9.3	5.5	3.6	2.8	
15,000	*	*	*	*	*	*	*	*	>25	20	17	13	11	6.2	4.2	3.2	
20,000	*	*	*	*	*	*	*	*	*	23	19	15	12	7.4	4.7	3.7	
50,000	*	*	*	*	*	*	*	*	*	>25	>25	21	18	10	6.6	5.0	
75,000	*	*	*	*	*	*	*	*	*	*	*	>25	21	12	7.6	5.8	
100,000	*	*	*	*	*	*	*	*	*	*	*	*	24	13	8.5	6.4	
150,000	*	*	*	*	*	*	*	*	*	*	*	*	>25	15	9.8	7.4	
200,000	*	*	*	*	*	*	*	*	*	*	*	*	*	17	11	8.2	

* > 25 miles (report distance as 25 miles)

<0.1 mile (report distance as 0.1 mile)

Reference Table 18
Dense Gas Distances to Toxic Endpoint
10-minute Release, Rural Conditions, D Stability, Wind Speed 3.0 Meters per Second

Release Rate (lbs/min)	Toxic Endpoint (mg/L)															
	0.0004	0.0007	0.001	0.002	0.0035	0.005	0.0075	0.01	0.02	0.035	0.05	0.075	0.1	0.25	0.5	0.75
	Distance (Miles)															
1	0.6	0.4	0.4	0.2	0.2	0.1	0.1	0.1	<0.1	<0.1	#	#	#	#	#	#
2	0.9	0.6	0.5	0.4	0.3	0.2	0.2	0.1	0.1	0.1	<0.1	<0.1	#	#	#	#
5	1.4	1.1	0.9	0.6	0.4	0.4	0.3	0.2	0.2	0.1	0.1	0.1	<0.1	#	#	#
10	2.0	1.5	1.2	0.9	0.6	0.5	0.4	0.4	0.2	0.2	0.1	0.1	0.1	<0.1	<0.1	#
30	3.7	2.7	2.2	1.5	1.1	0.9	0.7	0.7	0.5	0.3	0.3	0.2	0.2	0.1	0.1	<0.1
50	5.0	3.7	3.0	2.1	1.9	1.2	1.0	0.9	0.6	0.4	0.4	0.3	0.2	0.2	0.1	0.1
100	7.4	5.3	4.3	3.0	2.3	1.7	1.4	1.2	0.9	0.6	0.6	0.4	0.4	0.2	0.2	0.1
150	8.7	6.8	5.5	3.8	2.8	2.3	1.9	1.6	1.1	0.8	0.7	0.6	0.5	0.3	0.2	0.2
250	12	8.7	7.4	5.0	3.7	3.0	2.4	2.1	1.4	1.1	0.9	0.7	0.5	0.4	0.3	0.2
500	17	13	11	7.4	5.3	4.5	3.6	3.0	2.1	1.6	1.3	1.1	0.9	0.6	0.4	0.3
750	22	16	13	9.3	6.8	5.6	4.5	3.8	2.7	1.9	1.6	1.3	1.1	0.7	0.5	0.4
1,000	>25	19	16	11	8.1	6.8	5.2	4.5	3.1	2.3	2.2	1.5	1.3	0.8	0.6	0.4
1,500	*	23	19	13	9.9	8.1	6.8	5.6	3.9	2.9	2.4	1.9	1.6	1.0	0.7	0.6
2,000	*	>25	22	15	12	9.3	7.4	6.8	4.5	3.4	2.7	2.2	1.9	1.2	0.8	0.6
2,500	*	*	25	17	13	11	8.7	7.4	5.2	3.8	3.2	2.5	2.1	1.3	0.9	0.7
3,000	*	*	>25	19	14	12	9.3	8.1	5.7	4.2	3.5	2.8	2.4	1.4	1.0	0.8
4,000	*	*	*	22	17	14	11	9.3	6.8	4.9	4.1	3.3	2.8	1.7	1.1	0.9
5,000	*	*	*	>25	19	16	12	11	7.4	5.6	4.7	3.7	3.1	2.1	1.3	1.1
7,500	*	*	*	*	24	19	16	13	9.3	6.8	5.8	4.7	4.0	2.4	1.6	1.3
10,000	*	*	*	*	>25	22	18	16	11	8.1	6.8	5.3	4.6	2.8	1.9	1.5
15,000	*	*	*	*	*	>25	22	19	13	9.9	8.1	6.8	5.7	3.5	2.4	1.9
20,000	*	*	*	*	*	*	>25	22	16	11	9.3	7.4	6.8	4.0	2.8	2.2
50,000	*	*	*	*	*	*	*	>25	24	18	15	12	10	6.5	4.5	3.6
75,000	*	*	*	*	*	*	*	*	>25	22	18	15	13	7.8	5.4	4.4
100,000	*	*	*	*	*	*	*	*	*	>25	21	17	14	8.9	6.3	5.0
150,000	*	*	*	*	*	*	*	*	*	*	>25	20	17	11	7.4	6.0
200,000	*	*	*	*	*	*	*	*	*	*	*	23	19	12	8.5	6.8

* > 25 miles (report distance as 25 miles)

<0.1 mile (report distance as 0.1 mile)

04/06/21
09:27:14

*** SCREEN3 MODEL RUN ***
*** VERSION DATED 13043 ***

Exfluor - Florence Site - Fluorine Release

SIMPLE TERRAIN INPUTS:

SOURCE TYPE = POINT
EMISSION RATE (G/S) = 1.97820
STACK HEIGHT (M) = 0.3048
STK INSIDE DIAM (M) = 0.0010
STK EXIT VELOCITY (M/S) = 0.0000
STK GAS EXIT TEMP (K) = 293.1500
AMBIENT AIR TEMP (K) = 293.1500
RECEPTOR HEIGHT (M) = 0.0000
URBAN/RURAL OPTION = RURAL
BUILDING HEIGHT (M) = 9.1440
MIN HORIZ BLDG DIM (M) = 42.3400
MAX HORIZ BLDG DIM (M) = 43.8300

THE REGULATORY (DEFAULT) MIXING HEIGHT OPTION WAS SELECTED.
THE REGULATORY (DEFAULT) ANEMOMETER HEIGHT OF 10.0 METERS WAS ENTERED.

BUOY. FLUX = 0.000 M**4/S**3; MOM. FLUX = 0.000 M**4/S**2.

*** FULL METEOROLOGY ***

*** SCREEN AUTOMATED DISTANCES ***

*** TERRAIN HEIGHT OF 0. M ABOVE STACK BASE USED FOR FOLLOWING DISTANCES ***

DIST (M)	CONC (UG/M**3)	STAB	U10M (M/S)	USTK (M/S)	MIX HT (M)	PLUME HT (M)	SIGMA Y (M)	SIGMA Z (M)	DWASH
1.	0.000	0	0.0	0.0	0.0	0.00	0.00	0.00	NA
100.	7044.	6	1.0	1.0	10000.0	0.30	8.08	11.06	SS
200.	4495.	6	1.0	1.0	10000.0	0.30	11.57	12.10	SS
300.	3210.	6	1.0	1.0	10000.0	0.30	14.97	13.11	SS
400.	2480.	6	1.0	1.0	10000.0	0.30	18.29	13.88	SS
500.	1980.	6	1.0	1.0	10000.0	0.30	21.55	14.75	SS
600.	1630.	6	1.0	1.0	10000.0	0.30	24.77	15.60	SS
700.	1373.	6	1.0	1.0	10000.0	0.30	27.94	16.41	SS
800.	1178.	6	1.0	1.0	10000.0	0.30	31.08	17.20	SS
900.	1025.	6	1.0	1.0	10000.0	0.30	34.19	17.97	SS
1000.	902.3	6	1.0	1.0	10000.0	0.30	37.26	18.72	SS
1100.	802.6	6	1.0	1.0	10000.0	0.30	40.31	19.46	SS
1200.	719.9	6	1.0	1.0	10000.0	0.30	43.34	20.18	SS
1300.	650.6	6	1.0	1.0	10000.0	0.30	46.34	20.88	SS
1400.	591.7	6	1.0	1.0	10000.0	0.30	49.32	21.58	SS
1500.	559.6	6	1.0	1.0	10000.0	0.30	52.28	21.52	SS
1600.	515.4	6	1.0	1.0	10000.0	0.30	55.23	22.12	SS
1700.	477.1	6	1.0	1.0	10000.0	0.30	58.15	22.69	SS
1800.	443.4	6	1.0	1.0	10000.0	0.30	61.06	23.25	SS
1900.	413.6	6	1.0	1.0	10000.0	0.30	63.96	23.80	SS
2000.	387.0	6	1.0	1.0	10000.0	0.30	66.84	24.34	SS
2100.	363.2	6	1.0	1.0	10000.0	0.30	69.70	24.87	SS
2200.	341.8	6	1.0	1.0	10000.0	0.30	72.56	25.39	SS
2300.	322.4	6	1.0	1.0	10000.0	0.30	75.40	25.90	SS
2400.	304.8	6	1.0	1.0	10000.0	0.30	78.22	26.40	SS
2500.	288.8	6	1.0	1.0	10000.0	0.30	81.04	26.90	SS
2600.	281.4	6	1.0	1.0	10000.0	0.30	83.84	26.69	SS
2700.	267.7	6	1.0	1.0	10000.0	0.30	86.64	27.15	SS
2800.	255.5	6	1.0	1.0	10000.0	0.30	89.42	27.56	SS
2900.	244.2	6	1.0	1.0	10000.0	0.30	92.19	27.97	SS
3000.	233.8	6	1.0	1.0	10000.0	0.30	94.96	28.36	SS

3500.	191.5	6	1.0	1.0	10000.0	0.30	108.64	30.26	SS
4000.	161.0	6	1.0	1.0	10000.0	0.30	122.11	32.03	SS
4500.	138.0	6	1.0	1.0	10000.0	0.30	135.41	33.70	SS
5000.	120.2	6	1.0	1.0	10000.0	0.30	148.54	35.28	SS
5500.	106.0	6	1.0	1.0	10000.0	0.30	161.53	36.77	SS
6000.	94.51	6	1.0	1.0	10000.0	0.30	174.39	38.20	SS
6500.	85.02	6	1.0	1.0	10000.0	0.30	187.13	39.58	SS
7000.	77.80	6	1.0	1.0	10000.0	0.30	199.76	40.52	SS
7500.	71.20	6	1.0	1.0	10000.0	0.30	212.28	41.66	SS
8000.	65.54	6	1.0	1.0	10000.0	0.30	224.71	42.76	SS
8500.	60.62	6	1.0	1.0	10000.0	0.30	237.04	43.82	SS
9000.	56.32	6	1.0	1.0	10000.0	0.30	249.29	44.84	SS
9500.	52.54	6	1.0	1.0	10000.0	0.30	261.46	45.84	SS
10000.	49.18	6	1.0	1.0	10000.0	0.30	273.55	46.80	SS
15000.	29.34	6	1.0	1.0	10000.0	0.30	390.95	54.90	SS
20000.	20.74	6	1.0	1.0	10000.0	0.30	503.37	60.31	SS
25000.	15.86	6	1.0	1.0	10000.0	0.30	612.10	64.87	SS
30000.	12.74	6	1.0	1.0	10000.0	0.30	717.88	68.84	SS
40000.	9.164	6	1.0	1.0	10000.0	0.30	922.43	74.49	SS
50000.	7.102	6	1.0	1.0	10000.0	0.30	1119.55	79.19	SS

MAXIMUM 1-HR CONCENTRATION AT OR BEYOND 1. M:
 28. 0.3016E+05 4 1.0 1.0 320.0 0.30 3.31 6.51 SS

DWASH= MEANS NO CALC MADE (CONC = 0.0)
 DWASH=NO MEANS NO BUILDING DOWNWASH USED
 DWASH=HS MEANS HUBER-SNYDER DOWNWASH USED
 DWASH=SS MEANS SCHULMAN-SCIRE DOWNWASH USED
 DWASH=NA MEANS DOWNWASH NOT APPLICABLE, X<3*LB

 *** REGULATORY (Default) ***
 PERFORMING CAVITY CALCULATIONS
 WITH ORIGINAL SCREEN CAVITY MODEL
 (BRODE, 1988)

*** CAVITY CALCULATION - 1 ***	*** CAVITY CALCULATION - 2 ***
CONC (UG/M**3) = 3291.	CONC (UG/M**3) = 3406.
CRIT WS @10M (M/S) = 1.00	CRIT WS @10M (M/S) = 1.00
CRIT WS @ HS (M/S) = 1.00	CRIT WS @ HS (M/S) = 1.00
DILUTION WS (M/S) = 1.00	DILUTION WS (M/S) = 1.00
CAVITY HT (M) = 9.18	CAVITY HT (M) = 9.17
CAVITY LENGTH (M) = 34.89	CAVITY LENGTH (M) = 34.34
ALONGWIND DIM (M) = 42.34	ALONGWIND DIM (M) = 43.83

 END OF CAVITY CALCULATIONS

 *** SUMMARY OF SCREEN MODEL RESULTS ***

CALCULATION PROCEDURE	MAX CONC (UG/M**3)	DIST TO MAX (M)	TERRAIN HT (M)
SIMPLE TERRAIN	0.3016E+05	28.	0.
BLDG. CAVITY-1	3291.	35.	-- (DIST = CAVITY LENGTH)
BLDG. CAVITY-2	3406.	34.	-- (DIST = CAVITY LENGTH)

SAFETY DATA SHEET

Airgas

Fluorine

Section 1. Identification

GHS product identifier : Fluorine
Chemical name : fluorine
Other means of identification :
Product use : Synthetic/Analytical chemistry.
Synonym :
SDS # : 001061
Supplier's details : Airgas USA, LLC and its affiliates
259 North Radnor-Chester Road
Suite 100
Radnor, PA 19087-5283
1-610-687-5253

Emergency telephone number (with hours of operation) : 1-866-734-3438

Section 2. Hazards identification

OSHA/HCS status : This material is considered hazardous by the OSHA Hazard Communication Standard (29 CFR 1910.1200).
Classification of the substance or mixture : OXIDIZING GASES - Category 1
GASES UNDER PRESSURE - Compressed gas
ACUTE TOXICITY (inhalation) - Category 1
SKIN CORROSION/IRRITATION - Category 1
SERIOUS EYE DAMAGE/ EYE IRRITATION - Category 1
SPECIFIC TARGET ORGAN TOXICITY (SINGLE EXPOSURE) (respiratory tract) - Category 1

GHS label elements

Hazard pictograms :



Signal word :

Danger

Hazard statements :

May cause or intensify fire; oxidizer.
Contains gas under pressure; may explode if heated.
Extremely Reactive.
Fatal if inhaled.
Causes severe skin burns and eye damage.
Causes serious eye damage.
Corrosive to the respiratory tract.

Precautionary statements

Date of issue/Date of revision : 4/25/2015. **Date of previous issue** : 10/16/2014. **Version** : 0.04 1/14

Section 2. Hazards identification

- General** : Read and follow all Safety Data Sheets (SDS'S) before use. Read label before use. Keep out of reach of children. If medical advice is needed, have product container or label at hand. Close valve after each use and when empty. Use equipment rated for cylinder pressure. Do not open valve until connected to equipment prepared for use. Use a back flow preventative device in the piping. Use only equipment of compatible materials of construction. Open valve slowly. Use only with equipment cleaned for Oxygen service. Use only with equipment passivated before use. Use behind barricades with remote extensions on valves and regulators.
- Prevention** : Wear protective gloves. Wear eye or face protection. Wear respiratory protection. Keep away from clothing, incompatible materials and combustible materials. Keep reduction valves free from grease and oil. Use only outdoors or in a well-ventilated area. Do not breathe gas. Do not eat, drink or smoke when using this product. Wash hands thoroughly after handling. Use and store only outdoors or in a well ventilated place.
- Response** : In case of fire: Stop leak if safe to do so. IF exposed: Call a POISON CENTER or physician. IF INHALED: Remove victim to fresh air and keep at rest in a position comfortable for breathing. Immediately call a POISON CENTER or physician. IF SWALLOWED: Immediately call a POISON CENTER or physician. Rinse mouth. Do NOT induce vomiting. IF ON SKIN (or hair): Take off immediately all contaminated clothing. Rinse skin with water or shower. Wash contaminated clothing before reuse. Immediately call a POISON CENTER or physician. IF IN EYES: Rinse cautiously with water for several minutes. Remove contact lenses, if present and easy to do. Continue rinsing. Immediately call a POISON CENTER or physician.
- Storage** : Store locked up. Protect from sunlight. Protect from sunlight when ambient temperature exceeds 52°C/125°F. Store in a well-ventilated place.
- Disposal** : Dispose of contents and container in accordance with all local, regional, national and international regulations.
- Hazards not otherwise classified** : In addition to any other important health or physical hazards, this product may displace oxygen and cause rapid suffocation.

Section 3. Composition/information on ingredients

- Substance/mixture** : Substance
- Chemical name** : fluorine
- Other means of identification** :

CAS number/other identifiers

- CAS number** : 7782-41-4
- Product code** : 001061

Ingredient name	%	CAS number
fluorine	100	7782-41-4

There are no additional ingredients present which, within the current knowledge of the supplier and in the concentrations applicable, are classified as hazardous to health or the environment and hence require reporting in this section.

Occupational exposure limits, if available, are listed in Section 8.

Section 4. First aid measures

Description of necessary first aid measures

- Eye contact** : Get medical attention immediately. Call a poison center or physician. Immediately flush eyes with plenty of water, occasionally lifting the upper and lower eyelids. Check for and remove any contact lenses. Continue to rinse for at least 10 minutes. Chemical burns must be treated promptly by a physician.
- Inhalation** : Get medical attention immediately. Call a poison center or physician. Remove victim to fresh air and keep at rest in a position comfortable for breathing. If it is suspected that fumes are still present, the rescuer should wear an appropriate mask or self-contained breathing apparatus. If not breathing, if breathing is irregular or if respiratory arrest occurs, provide artificial respiration or oxygen by trained personnel. It may be dangerous to the person providing aid to give mouth-to-mouth resuscitation. If unconscious, place in recovery position and get medical attention immediately. Maintain an open airway. Loosen tight clothing such as a collar, tie, belt or waistband.
- Skin contact** : Get medical attention immediately. Call a poison center or physician. Flush contaminated skin with plenty of water. Remove contaminated clothing and shoes. Wash contaminated clothing thoroughly with water before removing it, or wear gloves. Continue to rinse for at least 10 minutes. Chemical burns must be treated promptly by a physician. Wash clothing before reuse. Clean shoes thoroughly before reuse.
- Ingestion** : As this product is a gas, refer to the inhalation section.

Most important symptoms/effects, acute and delayed

Potential acute health effects

- Eye contact** : Causes serious eye damage. Contact with rapidly expanding gas may cause burns or frostbite.
- Inhalation** : Fatal if inhaled. May give off gas, vapor or dust that is very irritating or corrosive to the respiratory system.
- Skin contact** : Causes severe burns. Contact with rapidly expanding gas may cause burns or frostbite.
- Frostbite** : Try to warm up the frozen tissues and seek medical attention.
- Ingestion** : May cause burns to mouth, throat and stomach. As this product is a gas, refer to the inhalation section.

Over-exposure signs/symptoms

- Eye contact** : Adverse symptoms may include the following:
pain
watering
redness
- Inhalation** : No specific data.
- Skin contact** : Adverse symptoms may include the following:
pain or irritation
redness
blistering may occur
- Ingestion** : Adverse symptoms may include the following:
stomach pains

Indication of immediate medical attention and special treatment needed, if necessary

- Notes to physician** : Treat symptomatically. Contact poison treatment specialist immediately if large quantities have been ingested or inhaled.
- Specific treatments** : No specific treatment.
- Protection of first-aiders** : No action shall be taken involving any personal risk or without suitable training. If it is suspected that fumes are still present, the rescuer should wear an appropriate mask or self-contained breathing apparatus. It may be dangerous to the person providing aid to give mouth-to-mouth resuscitation. Wash contaminated clothing thoroughly with water before removing it, or wear gloves.

Section 4. First aid measures

See toxicological information (Section 11)

Section 5. Fire-fighting measures

Extinguishing media

Suitable extinguishing media : Use an extinguishing agent suitable for the surrounding fire.

Unsuitable extinguishing media : None known.

Specific hazards arising from the chemical : Contains gas under pressure. Oxidizing material. This material increases the risk of fire and may aid combustion. Contact with combustible material may cause fire. In a fire or if heated, a pressure increase will occur and the container may burst or explode.

Hazardous thermal decomposition products : Decomposition products may include the following materials:
halogenated compounds

Special protective actions for fire-fighters : Promptly isolate the scene by removing all persons from the vicinity of the incident if there is a fire. No action shall be taken involving any personal risk or without suitable training. Contact supplier immediately for specialist advice. Move containers from fire area if this can be done without risk. Use water spray to keep fire-exposed containers cool. If involved in fire, shut off flow immediately if it can be done without risk.

Special protective equipment for fire-fighters : Fire-fighters should wear appropriate protective equipment and self-contained breathing apparatus (SCBA) with a full face-piece operated in positive pressure mode.

Section 6. Accidental release measures

Personal precautions, protective equipment and emergency procedures

For non-emergency personnel : No action shall be taken involving any personal risk or without suitable training. Evacuate surrounding areas. Keep unnecessary and unprotected personnel from entering. Shut off all ignition sources. No flares, smoking or flames in hazard area. Do not breathe gas. Provide adequate ventilation. Wear appropriate respirator when ventilation is inadequate. Put on appropriate personal protective equipment.

For emergency responders : If specialised clothing is required to deal with the spillage, take note of any information in Section 8 on suitable and unsuitable materials. See also the information in "For non-emergency personnel".

Environmental precautions : Ensure emergency procedures to deal with accidental gas releases are in place to avoid contamination of the environment. Inform the relevant authorities if the product has caused environmental pollution (sewers, waterways, soil or air).

Methods and materials for containment and cleaning up

Small spill : Immediately contact emergency personnel. Stop leak if without risk. Use spark-proof tools and explosion-proof equipment.

Large spill : Immediately contact emergency personnel. Stop leak if without risk. Use spark-proof tools and explosion-proof equipment. Note: see Section 1 for emergency contact information and Section 13 for waste disposal.

Section 7. Handling and storage

Precautions for safe handling

Protective measures : Put on appropriate personal protective equipment (see Section 8). Contains gas under pressure. Do not get in eyes or on skin or clothing. Do not breathe gas. Use only with adequate ventilation. Wear appropriate respirator when ventilation is inadequate. Keep away from clothing, incompatible materials and combustible materials. Keep reduction valves free from grease and oil. Empty containers retain product residue and can be hazardous. Do not puncture or incinerate container. Use equipment rated for cylinder pressure. Close valve after each use and when empty. Protect cylinders from physical damage; do not drag, roll, slide, or drop. Use a suitable hand truck for cylinder movement.

Advice on general occupational hygiene : Eating, drinking and smoking should be prohibited in areas where this material is handled, stored and processed. Workers should wash hands and face before eating, drinking and smoking. Remove contaminated clothing and protective equipment before entering eating areas. See also Section 8 for additional information on hygiene measures.

Conditions for safe storage, including any incompatibilities : Store in accordance with local regulations. Store in a segregated and approved area. Store away from direct sunlight in a dry, cool and well-ventilated area, away from incompatible materials (see Section 10). Store locked up. Separate from acids, alkalies, reducing agents and combustibles. Keep container tightly closed and sealed until ready for use. Cylinders should be stored upright, with valve protection cap in place, and firmly secured to prevent falling or being knocked over. Cylinder temperatures should not exceed 52 °C (125 °F).

Section 8. Exposure controls/personal protection

Control parameters

Occupational exposure limits

Ingredient name	Exposure limits
fluorine	<p>ACGIH TLV (United States, 3/2012). STEL: 3.1 mg/m³ 15 minutes. STEL: 2 ppm 15 minutes. TWA: 1.6 mg/m³ 8 hours. TWA: 1 ppm 8 hours.</p> <p>NIOSH REL (United States, 1/2013). TWA: 0.2 mg/m³ 10 hours. TWA: 0.1 ppm 10 hours.</p> <p>OSHA PEL (United States, 6/2010). TWA: 0.2 mg/m³ 8 hours. TWA: 0.1 ppm 8 hours.</p> <p>OSHA PEL 1989 (United States, 3/1989). TWA: 0.2 mg/m³ 8 hours. TWA: 0.1 ppm 8 hours.</p>

Appropriate engineering controls : Use only with adequate ventilation. Use process enclosures, local exhaust ventilation or other engineering controls to keep worker exposure to airborne contaminants below any recommended or statutory limits.

Environmental exposure controls : Emissions from ventilation or work process equipment should be checked to ensure they comply with the requirements of environmental protection legislation. In some cases, fume scrubbers, filters or engineering modifications to the process equipment will be necessary to reduce emissions to acceptable levels.

Individual protection measures

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Section 8. Exposure controls/personal protection

- Hygiene measures** : Wash hands, forearms and face thoroughly after handling chemical products, before eating, smoking and using the lavatory and at the end of the working period. Appropriate techniques should be used to remove potentially contaminated clothing. Wash contaminated clothing before reusing. Ensure that eyewash stations and safety showers are close to the workstation location.
- Eye/face protection** : Safety eyewear complying with an approved standard should be used when a risk assessment indicates this is necessary to avoid exposure to liquid splashes, mists, gases or dusts. If contact is possible, the following protection should be worn, unless the assessment indicates a higher degree of protection: chemical splash goggles and/or face shield. If inhalation hazards exist, a full-face respirator may be required instead.
- Skin protection**
- Hand protection** : Chemical-resistant, impervious gloves complying with an approved standard should be worn at all times when handling chemical products if a risk assessment indicates this is necessary. Considering the parameters specified by the glove manufacturer, check during use that the gloves are still retaining their protective properties. It should be noted that the time to breakthrough for any glove material may be different for different glove manufacturers. In the case of mixtures, consisting of several substances, the protection time of the gloves cannot be accurately estimated.
- Body protection** : Personal protective equipment for the body should be selected based on the task being performed and the risks involved and should be approved by a specialist before handling this product.
- Other skin protection** : Appropriate footwear and any additional skin protection measures should be selected based on the task being performed and the risks involved and should be approved by a specialist before handling this product.
- Respiratory protection** : Use a properly fitted, air-purifying or air-fed respirator complying with an approved standard if a risk assessment indicates this is necessary. Respirator selection must be based on known or anticipated exposure levels, the hazards of the product and the safe working limits of the selected respirator.

Section 9. Physical and chemical properties

Appearance

- Physical state** : Gas. [This gas is a pale-yellow to greenish, corrosive, toxic, liquefied gas which is an extremely powerful oxidizer with a pungent odor.]
- Color** : Yellowish. Yellow.
- Molecular weight** : 38 g/mole
- Molecular formula** : F₂
- Boiling/condensation point** : -188°C (-306.4°F)
- Melting/freezing point** : -219.61°C (-363.3°F)
- Critical temperature** : -128.55°C (-199.4°F)
- Odor** : Pungent.
- Odor threshold** : Not available.
- pH** : Not available.
- Flash point** : [Product does not sustain combustion.]
- Burning time** : Not applicable.
- Burning rate** : Not applicable.
- Evaporation rate** : Not available.
- Flammability (solid, gas)** : Extremely flammable in the presence of the following materials or conditions: reducing materials, combustible materials and organic materials.
- Lower and upper explosive (flammable) limits** : Not available.
- Vapor pressure** : Not available.

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Section 9. Physical and chemical properties

Vapor density	: 1.312 (Air = 1)
Specific Volume (ft ³ /lb)	: 10.2041
Gas Density (lb/ft ³)	: 0.098
Relative density	: Not applicable.
Solubility	: Not available.
Solubility in water	: Not available.
Partition coefficient: n-octanol/water	: Not available.
Auto-ignition temperature	: Not available.
Decomposition temperature	: Not available.
SADT	: Not available.
Viscosity	: Not applicable.

Section 10. Stability and reactivity

Reactivity	: No specific test data related to reactivity available for this product or its ingredients.
Chemical stability	: The product is stable.
Possibility of hazardous reactions	: Hazardous reactions or instability may occur under certain conditions of storage or use. Conditions may include the following: contact with combustible materials Reactions may include the following: risk of causing fire
Conditions to avoid	: No specific data.
Incompatibility with various substances	: Extremely reactive or incompatible with the following materials: reducing materials, combustible materials, organic materials, metals, alkalis and moisture.
Hazardous decomposition products	: Under normal conditions of storage and use, hazardous decomposition products should not be produced.
Hazardous polymerization	: Under normal conditions of storage and use, hazardous polymerization will not occur.

Section 11. Toxicological information

Information on toxicological effects

Acute toxicity

Product/ingredient name	Result	Species	Dose	Exposure
fluorine	LC50 Inhalation Gas.	Rat	185 ppm	1 hours

Irritation/Corrosion

Product/ingredient name	Result	Species	Score	Exposure	Observation
fluorine	Eyes - Mild irritant	Human	-	5 minutes 25 parts per million	-

Sensitization

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Section 11. Toxicological information

Not available.

Mutagenicity

Not available.

Carcinogenicity

Not available.

Reproductive toxicity

Not available.

Teratogenicity

Not available.

Specific target organ toxicity (single exposure)

Name	Category	Route of exposure	Target organs
fluorine	Category 1	Not determined	respiratory tract

Specific target organ toxicity (repeated exposure)

Not available.

Aspiration hazard

Not available.

Information on the likely routes of exposure : Not available.

Potential acute health effects

- Eye contact** : Causes serious eye damage. Contact with rapidly expanding gas may cause burns or frostbite.
- Inhalation** : Fatal if inhaled. May give off gas, vapor or dust that is very irritating or corrosive to the respiratory system.
- Skin contact** : Causes severe burns. Contact with rapidly expanding gas may cause burns or frostbite.
- Ingestion** : May cause burns to mouth, throat and stomach. As this product is a gas, refer to the inhalation section.

Symptoms related to the physical, chemical and toxicological characteristics

- Eye contact** : Adverse symptoms may include the following:
pain
watering
redness
- Inhalation** : No specific data.
- Skin contact** : Adverse symptoms may include the following:
pain or irritation
redness
blistering may occur
- Ingestion** : Adverse symptoms may include the following:
stomach pains

Delayed and immediate effects and also chronic effects from short and long term exposure

Short term exposure

Potential immediate effects : Not available.

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Section 11. Toxicological information

Potential delayed effects : Not available.

Long term exposure

Potential immediate effects : Not available.

Potential delayed effects : Not available.

Potential chronic health effects

Not available.

General : No known significant effects or critical hazards.

Carcinogenicity : No known significant effects or critical hazards.

Mutagenicity : No known significant effects or critical hazards.

Teratogenicity : No known significant effects or critical hazards.

Developmental effects : No known significant effects or critical hazards.

Fertility effects : No known significant effects or critical hazards.

Numerical measures of toxicity

Acute toxicity estimates

Not available.

Section 12. Ecological information

Toxicity

Not available.

Persistence and degradability

Not available.

Bioaccumulative potential

Not available.

Mobility in soil

Soil/water partition coefficient (K_{oc}) : Not available.

Other adverse effects : No known significant effects or critical hazards.

Section 13. Disposal considerations

Disposal methods : The generation of waste should be avoided or minimized wherever possible. Disposal of this product, solutions and any by-products should at all times comply with the requirements of environmental protection and waste disposal legislation and any regional local authority requirements. Dispose of surplus and non-recyclable products via a licensed waste disposal contractor. Waste should not be disposed of untreated to the sewer unless fully compliant with the requirements of all authorities with jurisdiction. Empty Airgas-owned pressure vessels should be returned to Airgas. Waste packaging should be recycled. Incineration or landfill should only be considered when recycling is not feasible. This material and its container must be disposed of in a safe way. Empty containers or liners may retain some product residues. Do not puncture or incinerate

Fluorine






Section 13. Disposal considerations

container.

United States - RCRA Acute hazardous waste "P" List

Ingredient	CAS #	Status	Reference number
Fluorine	7782-41-4	Listed	P056

Section 14. Transport information

	DOT	TDG	Mexico	IMDG	IATA
UN number	UN1045	UN1045	UN1045	UN1045	UN1045
UN proper shipping name	FLUORINE, COMPRESSED	FLUORINE, COMPRESSED	COMPRESSED, FLUORINE	FLUORINE, COMPRESSED	FLUORINE, COMPRESSED
Transport hazard class(es)	2.3 (5.1, 8) 	2.3 (5.1, 8) 	2.3 (5.1, 8) 	2.3 (5.1, 8) 	2.3 (5.1, 8) 
Packing group	-	-	-	-	-
Environment	No.	No.	No.	No.	No.
Additional information	<p>Inhalation hazard zone A</p> <p>Reportable quantity 10 lbs / 4.54 kg Package sizes shipped in quantities less than the product reportable quantity are not subject to the RQ (reportable quantity) transportation requirements.</p> <p>Limited quantity Yes.</p> <p>Packaging instruction Passenger aircraft Quantity limitation: Forbidden.</p> <p>Cargo aircraft Quantity limitation: Forbidden.</p> <p>Special provisions 1</p>	<p>Explosive Limit and Limited Quantity Index 0</p> <p>ERAP Index 25</p> <p>Passenger Carrying Ship Index Forbidden</p> <p>Passenger Carrying Road or Rail Index Forbidden</p> <p>Special provisions 38</p>	-	-	<p>Passenger and Cargo Aircraft Quantity limitation: 0 Forbidden</p> <p>Cargo Aircraft Only Quantity limitation: 0 Forbidden</p>

"Refer to CFR 49 (or authority having jurisdiction) to determine the information required for shipment of the product."

Special precautions for user : **Transport within user's premises:** always transport in closed containers that are upright and secure. Ensure that persons transporting the product know what to do in the event of an accident or spillage.

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Section 14. Transport information

Transport in bulk according to Annex II of MARPOL 73/78 and the IBC Code : Not available.

Section 15. Regulatory information

U.S. Federal regulations : TSCA 8(a) CDR Exempt/Partial exemption: Not determined
United States inventory (TSCA 8b): This material is listed or exempted.

Clean Air Act (CAA) 112 regulated toxic substances: fluorine

Clean Air Act Section 112 (b) Hazardous Air Pollutants (HAPs) : Not listed

Clean Air Act Section 602 Class I Substances : Not listed

Clean Air Act Section 602 Class II Substances : Not listed

DEA List I Chemicals (Precursor Chemicals) : Not listed

DEA List II Chemicals (Essential Chemicals) : Not listed

SARA 302/304

Composition/information on ingredients

Name	%	EHS	SARA 302 TPQ		SARA 304 RQ	
			(lbs)	(gallons)	(lbs)	(gallons)
fluorine	100	Yes.	-	-	-	-

SARA 304 RQ : Not applicable.

SARA 311/312

Classification : Sudden release of pressure
Immediate (acute) health hazard

Composition/information on ingredients

Name	%	Fire hazard	Sudden release of pressure	Reactive	Immediate (acute) health hazard	Delayed (chronic) health hazard
fluorine	100	No.	Yes.	No.	Yes.	No.

SARA 313

	Product name	CAS number	%
Form R - Reporting requirements	fluorine	7782-41-4	100
Supplier notification	fluorine	7782-41-4	100

SARA 313 notifications must not be detached from the SDS and any copying and redistribution of the SDS shall include copying and redistribution of the notice attached to copies of the SDS subsequently redistributed.

State regulations

Massachusetts : This material is listed.

New York : This material is listed.

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Section 15. Regulatory information

- New Jersey** : This material is listed.
Pennsylvania : This material is listed.
Canada inventory : This material is listed or exempted.

International regulations

- International lists** :
- Australia inventory (AICS):** This material is listed or exempted.
 - China inventory (IECSC):** This material is listed or exempted.
 - Japan inventory:** Not determined.
 - Korea inventory:** This material is listed or exempted.
 - Malaysia Inventory (EHS Register):** Not determined.
 - New Zealand Inventory of Chemicals (NZIoC):** This material is listed or exempted.
 - Philippines inventory (PICCS):** This material is listed or exempted.
 - Taiwan inventory (CSNN):** Not determined.

Chemical Weapons : Not listed

Convention List Schedule I Chemicals

Chemical Weapons : Not listed

Convention List Schedule II Chemicals

Chemical Weapons : Not listed

Convention List Schedule III Chemicals

Canada

- WHMIS (Canada)** :
- Class A: Compressed gas.
 - Class D-1A: Material causing immediate and serious toxic effects (Very toxic).
 - Class E: Corrosive material
 - Class F: Dangerously reactive material.
 - CEPA Toxic substances:** This material is not listed.
 - Canadian ARET:** This material is not listed.
 - Canadian NPRI:** This material is listed.
 - Alberta Designated Substances:** This material is not listed.
 - Ontario Designated Substances:** This material is not listed.
 - Quebec Designated Substances:** This material is not listed.

Section 16. Other information

- Canada Label requirements** :
- Class A: Compressed gas.
 - Class D-1A: Material causing immediate and serious toxic effects (Very toxic).
 - Class E: Corrosive material
 - Class F: Dangerously reactive material.

Hazardous Material Information System (U.S.A.)

Health	3
Flammability	0
Physical hazards	3

Caution: HMIS® ratings are based on a 0-4 rating scale, with 0 representing minimal hazards or risks, and 4 representing significant hazards or risks. Although HMIS® ratings are not required on SDSs under 29 CFR 1910.1200, the preparer may choose to provide them. HMIS® ratings are to be used with a fully implemented HMIS® program. HMIS® is a registered mark of the National Paint & Coatings Association (NPCA). HMIS® materials may be purchased exclusively from J. J. Keller (800) 327-6868.

The customer is responsible for determining the PPE code for this material.

Date of issue/Date of revision : 4/25/2015. **Date of previous issue** : 10/16/2014. **Version** : 0.04 12/14

Section 16. Other information

National Fire Protection Association (U.S.A.)



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Copyright ©2001, National Fire Protection Association, Quincy, MA 02269. This warning system is intended to be interpreted and applied only by properly trained individuals to identify fire, health and reactivity hazards of chemicals. The user is referred to certain limited number of chemicals with recommended classifications in NFPA 49 and NFPA 325, which would be used as a guideline only. Whether the chemicals are classified by NFPA or not, anyone using the 704 systems to classify chemicals does so at their own risk.

History

Date of printing	: 4/25/2015.
Date of issue/Date of revision	: 4/25/2015.
Date of previous issue	: 10/16/2014.
Version	: 0.04
Key to abbreviations	: ATE = Acute Toxicity Estimate BCF = Bioconcentration Factor GHS = Globally Harmonized System of Classification and Labelling of Chemicals IATA = International Air Transport Association IBC = Intermediate Bulk Container IMDG = International Maritime Dangerous Goods LogPow = logarithm of the octanol/water partition coefficient MARPOL 73/78 = International Convention for the Prevention of Pollution From Ships, 1973 as modified by the Protocol of 1978. ("Marpol" = marine pollution) UN = United Nations ACGIH – American Conference of Governmental Industrial Hygienists AIHA – American Industrial Hygiene Association CAS – Chemical Abstract Services CEPA – Canadian Environmental Protection Act CERCLA – Comprehensive Environmental Response, Compensation, and Liability Act (EPA) CFR – United States Code of Federal Regulations CPR – Controlled Products Regulations DSL – Domestic Substances List GWP – Global Warming Potential IARC – International Agency for Research on Cancer ICAO – International Civil Aviation Organisation Inh – Inhalation LC – Lethal concentration LD – Lethal dosage NDSL – Non-Domestic Substances List NIOSH – National Institute for Occupational Safety and Health TDG – Canadian Transportation of Dangerous Goods Act and Regulations TLV – Threshold Limit Value TSCA – Toxic Substances Control Act WEEL – Workplace Environmental Exposure Level WHMIS – Canadian Workplace Hazardous Material Information System
References	: Not available.

Date of issue/Date of revision	: 4/25/2015.	Date of previous issue	: 10/16/2014.	Version	: 0.04	13/14
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Section 16. Other information

✔ Indicates information that has changed from previously issued version.

Notice to reader

To the best of our knowledge, the information contained herein is accurate. However, neither the above-named supplier, nor any of its subsidiaries, assumes any liability whatsoever for the accuracy or completeness of the information contained herein.

Final determination of suitability of any material is the sole responsibility of the user. All materials may present unknown hazards and should be used with caution. Although certain hazards are described herein, we cannot guarantee that these are the only hazards that exist.

EXFLUOR RESEARCH CORPORATION
FLORENCE, TEXAS
PERMIT APPLICATION FOR FLORENCE SITE

JULY 2021

APPENDIX C

ELECTRONIC MODELING EVALUATION WORKBOOK (EMEW)

Texas Commission on Environmental Quality
Electronic Modeling Evaluation Workbook (EMEW)
General

July 2021
 Permit No.: TBA
 Exflur Research Corporation

Acknowledgement:		Select from the drop down:
I acknowledge that I am submitting an authorized TCEQ Electronic Modeling Evaluation Workbook and any necessary attachments. Except for inputting the requested data, I have not changed the TCEQ Electronic Modeling Evaluation Workbook in any way, including but not limited to changing formulas, formatting, content, or protections.		I agree
Administrative Information:		
Data Type:	Facility Information:	
Project Number (6 digits):		
Permit Number:	TBD	
Regulated Entity ID (9 digits):	110969227	
Facility Name:	Exflur Building 3	
Facility Address:	1100 CR 236	
Facility County (select one):	Williamson	
Company Name:	Exflur Research Corporation	
Company Contact Name:	Thomas	
Company Contact Number:	Bierschenk	
Company Contact Email:	bierschenk_t@exflur.com	
Modeling Company Name, as applicable:	Waid Environmental	
Modeling Contact Name:	Steven DeNero	
Modeling Contact Number:	(512) 255-9999	
Modeling Contact Email:	sdenero@waid.com	
New/Existing Site (select one):	New Site	
Modeling Date (MM/DD/YYYY):	7/1/2021	
Datum Used (select one):	NAD 83	
UTM Zone (select one):	14	
Sheet Instructions: Indicate in the Table of Contents which sections are applicable and included for this modeling demonstration. Select "X" from the drop down if the item below is included in the workbook. Note: This workbook is only for the following air dispersion models: AERSCREEN, ISC/ISCP, and/or AERMOD. If SCREEN3 is used, please use the separate Electronic Modeling Evaluation Workbook (EMEW) for SCREEN3 workbook.		
Table of Contents:		
Section:	Sheet Title (Click to jump to specific sheet):	Select an X from the dropdown menu if included:
1	General	X
2	Model Options	X
3	Building Downwash	X
4	Flare Source Parameters	
5	Point Source Parameters	X
6	Area Source Parameters	
7	Volume Source Calculations	X
8	Volume Source Parameters	X
9	Point and Flare Source Emissions	X
10	Area Source Emissions	
11	Volume Source Emissions	X
12	Speciated Emissions	X
13	Intermittent Sources	
14	Modeling Scenarios	X
15	Monitor Calculations	
16	Background Justification	
17	Secondary Formation of PM2.5	X
18	NAAQS/State Property Line (SPL) Modeling Results	X
19	Unit Impact Multipliers	X
20	Health Effects Modeling Results	X
21	Modeling File Names	X
22	Speciated Chemicals	

Texas Commission on Environmental Quality
Electronic Modeling Evaluation Workbook (EMEW)
General

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Included Attachments Instructions: The following are attachments that must be included with any modeling analysis. If providing the plot plan and area map with the permit application, ensure there is also a copy with the EMEW. The copy can be electronic.	Select an X from the dropdown menu if included:
Plot Plan: Instructions: Mark all that apply in the attached plot plan. For larger properties or dense source areas, provide multiple zoomed in plot plans that are legible.	
Property/Fence Lines all visible and marked.	X
North arrow included.	X
Clearly marked scale.	X
All sources and buildings are clearly labeled.	X
Area Map: Instructions: Mark all that apply in the attached area map.	
Annotate schools within 3,000ft of source's nearest property line.	Choose an item
All property lines are included.	X
Non-industrial receptors are identified.	X
Additional Attachments (as applicable): Note: These are just a few examples of attachments that may need to be included. There may be others depending on the scope of the modeling analysis.	Select an X from the dropdown menu if included:
Processed Met Data Information	
Excel spreadsheet of processed meteorology data.	Choose an item
Meteorological Files (all input and outputs).	Choose an item
Source Group Descriptions	
Description of modeling source groups (could be in a tabulated format).	Choose an item
Modeling Techniques and Scenarios Provide all justification and discussion on modeling scenarios used for the modeling analyses. The following boxes are examples of approaches that should be provided but is not all inclusive.	
Discussion on modeling techniques not discussed in workbook.	Choose an item
Justification for exceedance refinements, as applicable.	Choose an item
Discussion and images for worst-case determination, as applicable.	Choose an item
Single Property Line Designation, as applicable	
Include Agreement, Order, and map defining each petitioner.	Choose an item
Post Processing using Unit Impact Multipliers (UIMs)	
Include documentation on any calculations used with the UIMs (i.e., Step 3 of the MERA).	X
Tier 3 NO₂ analysis If OLM or PVMRM are used, provide all justification and documentation on using this approach.	
Description of model setup.	Choose an item
Description and justification of model options selected (i.e., NO ₂ to NO _x in-stack ratios).	Choose an item
Other Attachments Provide a list in the box below of additional attachments being provided that are not listed above:	
	Choose an item

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Electronic Modeling Evaluation Workbook (EMEW)
Model Options

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I. Project Information
A. Project Overview: In the box below, give a brief Project Overview. To type or insert text in box, double click in the box below. <i>Please limit your response to 2000 characters.</i>
Exflur Research Corporation (Exflur) proposes to build and operate a specialty chemicals manufacturing facility that will be located near Florence in Williamson County. The facility will be authorized to convert hydrocarbons to fluorocarbons.

II. Air Dispersion Modeling Preliminary Information								
Instructions: Fill in the information below based on your modeling setup. The selections chosen in this sheet will carry throughout the sheet and workbook. Based on selections below, only portions of the sheet and workbook will be available. Therefore, it is vital the sheet and workbook are filled out in order, do NOT skip around.								
For larger text boxes, double click to type or insert text.								
A. Type of Model Used: <i>Select "X" in all that apply</i>								
<table style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 30%; text-align: center;">AERSCREEN</td> <td style="width: 30%; text-align: center;"><input checked="" type="checkbox"/></td> <td style="width: 30%; text-align: center;">AERMOD</td> </tr> <tr> <td colspan="3" style="text-align: center;">Enter in all applicable Model Version(s).</td> </tr> </table>	AERSCREEN	<input checked="" type="checkbox"/>	AERMOD	Enter in all applicable Model Version(s).				
AERSCREEN	<input checked="" type="checkbox"/>	AERMOD						
Enter in all applicable Model Version(s).								
B. Building Downwash								
<table style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 10%; text-align: center;">Yes</td> <td>Is downwash applicable? (<i>Select "Yes" or "No"</i>)</td> </tr> <tr> <td style="text-align: center;">04274</td> <td>Enter BPIP version (AERMOD and ISCPrime only).</td> </tr> </table>	Yes	Is downwash applicable? (<i>Select "Yes" or "No"</i>)	04274	Enter BPIP version (AERMOD and ISCPrime only).				
Yes	Is downwash applicable? (<i>Select "Yes" or "No"</i>)							
04274	Enter BPIP version (AERMOD and ISCPrime only).							
C. Type of Analyses: (<i>Select "X" in all that apply</i>)								
*PSD projects should submit a protocol and not utilize this form.								
<table style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 10%; text-align: center;"><input checked="" type="checkbox"/></td> <td style="width: 60%;">Minor NSR NAAQS</td> <td style="width: 30%; text-align: center;"><input type="checkbox"/></td> <td style="width: 10%;">State Property Line</td> </tr> <tr> <td style="text-align: center;"><input checked="" type="checkbox"/></td> <td>Health Effects</td> <td></td> <td></td> </tr> </table>	<input checked="" type="checkbox"/>	Minor NSR NAAQS	<input type="checkbox"/>	State Property Line	<input checked="" type="checkbox"/>	Health Effects		
<input checked="" type="checkbox"/>	Minor NSR NAAQS	<input type="checkbox"/>	State Property Line					
<input checked="" type="checkbox"/>	Health Effects							

Texas Commission on Environmental Quality
Electronic Modeling Evaluation Workbook (EMEW)
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D. Constituents Evaluating: (Select "X" in all that apply)	
NAAQS: List all pollutants that require a modeling review. (Select "X" in all that apply)	
<input type="checkbox"/> SO ₂	<input type="checkbox"/> PM ₁₀
<input checked="" type="checkbox"/> CO	<input type="checkbox"/> PM _{2.5}
<input type="checkbox"/> Pb	<input checked="" type="checkbox"/> NO ₂
Both	Identify which averaging periods are being evaluated for NO ₂ .
Tier 1: Full Conversion	Identify the 1-hr NO ₂ tier used for the AERMOD or AERSCREEN analyses.
Tier 1: Full Conversion	Identify the annual NO ₂ tier used for the AERMOD or AERSCREEN analyses.
Health Effects: Fill in the Speciated Emissions sheet with all applicable pollutants, CAS numbers, and ESLs.	

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E. Dispersion Options: <i>If "Urban" has been selected and this project is using AERMOD or AERSCREEN, include the population used. Select "X" in the box to select an option.</i>	
<input type="checkbox"/> Urban	
<input checked="" type="checkbox"/> Rural	
Provide any additional justification on the dispersion option selected above:	
F. Determination of Surface Roughness: <i>If AERSCREEN or AERMOD is used, fill out the section below.</i>	
Select basis for surface roughness:	AERSURFACE
Select "X" in one of the three surface roughness categories:	
<input type="checkbox"/> Low	<input checked="" type="checkbox"/> Medium
	<input type="checkbox"/> High
If you are using AERSURFACE, please complete the following section:	
20060	AERSURFACE Version Number
604700	Center UTM Easting (meters)
3407100	Center UTM Northing (meters)
1	Study Radius (km)
No	Airport? (Select Yes or No)
No	Continuous Snow Cover (Select Yes or No)
Average	Surface Moisture (Select Wet, Dry, or Average)
No	Arid Region? (Select Yes or No)
Other (please specify in line below)	Month/Season Assignment

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G. Meteorological Data:			
If AERMOD and/or ISC/ISCPrime are selected, please complete the following section:			
13904	Surface Station		
3990	Upper Air Station		
150.9	Meters (m)	Profile Base Elevation (AERMOD only)	
19191	AERMET Version Number		
Yes	Was TCEQ pre-processed data used?	1 Year	Years used
Please enter the year(s) selected for this meteorological data:			
2016	1 Year		
Provide any other justification for Meteorological Data, as applicable.			

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Model Options

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H. Receptor Grid:		
For AERMOD or ISC/ISCPrime, fill in the following information on your modeled receptor grid. Note: Receptor grid resolution (tight, fine, medium, coarse) are based on recommended receptor grid spacing per the AQMG, if something outside of this is used, fully describe it below.		
25	Meters (m)	Tight Receptor Spacing
200	Meters (m)	Tight Receptor Distance
100	Meters (m)	Fine Receptor Spacing
1000	Meters (m)	Fine Receptor Distance
500	Meters (m)	Medium Receptor Spacing
5000	Meters (m)	Medium Receptor Distance
	Meters (m)	Coarse Receptor Spacing
	Meters (m)	Coarse Receptor Distance
Describe any other receptor grid designs (over water, GLC _{nh} , SPLD etc.):		
25-meter spacing along the fence line. Some of the non-criteria pollutants have specific ESLs for "Permitting in agricultural areas". A separate "Ag" receptor grid was used for these analyses. This is explained and illustrated in the supplemental document.		
I. Terrain:		
X	Elevated	
18081	AERMAP Version.	
For additional justification on terrain selection, fill in the box below:		

Texas Commission on Environmental Quality
Electronic Modeling Evaluation Workbook (EMEW)
Building Downwash

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Facility:

Downwash Type	Modeled Building ID	Tank Diameter (m)	Number of Tiers	Maximum Height (m)	Tier 1 Height (m)
Building	BLDG 3		1	9.14	9.14
Building	FIRE WA0		1	4.88	4.88
Building	FLAMMAB1		1	4.88	4.88
Building	LIME SL2		1	3.05	3.05
Building	STORAGE3		1	4.88	4.88

Texas Commission on Environmental Quality
Electronic Modeling Evaluation Workbook (EMEW)
Point Source Parameters

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Facility:

EPN	Model ID	Modeling Scenario	Source Description	Point Source Type	Point Source Justification	Easting: X [m]	Northing: Y [m]	Base Elevation [m]	Height [m]	Exit Temperature [K]	Exit Velocity [m/s]	Diameter [m]
EP3-1	EP31	Full Grid	Exhaust Gas Vent System	POINT	Vertical Stack	604666.00	3407123.00	331.80	12.19	299.800	2.215	0.152
EP3-1	EP31Ag	Ag Grid	Exhaust Gas Vent System	POINT	Vertical Stack	604666.00	3407123.00	331.80	12.19	299.800	2.215	0.152

Texas Commission on Environmental Quality
Electronic Modeling Evaluation Workbook (EMEW)
Volume Source Calculations

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Facility:

EPN	Model ID	Footprint of Source		Length of Side (making it a square) SQRT(L * W)	Type of Volume Source (sigma y)	Sigma Y (m)	Vertical Span		Vertical Dimension (m)
		Length (m)	Width (m)				Min Release (m)	Max Release (m)	
EP3-2	EP32	0.46	0.46	0.46	Single Volume Source <i>Pick from drop-down</i>	0.11	0.87	1.87	1.00
EP3-3	EP33	0.56	0.56	0.56	Single Volume Source	0.13	0.87	1.87	1.00
FUG3-1	FUG31	36.58	36.58	36.58	Single Volume Source	8.51	2.55	3.55	1.00
FUG3-2	FUG32	1.00	1.00	1.00	Single Volume Source	0.23	0.50	1.50	1.00
FUG3-3	FUG33	1.00	1.00	1.00	Single Volume Source	0.23	0.77	1.77	1.00
FUG3-4	FUG34	1.00	1.00	1.00	Single Volume Source	0.23	0.50	1.50	1.00
EP3-2	EP32Ag	0.46	0.46	0.46	Single Volume Source	0.11	0.87	1.87	1.00
EP3-3	EP33Ag	0.56	0.56	0.56	Single Volume Source	0.13	0.87	1.87	1.00
FUG3-1	FUG31Ag	36.58	36.58	36.58	Single Volume Source	8.51	2.55	3.55	1.00
FUG3-2	FUG32Ag	1.00	1.00	1.00	Single Volume Source	0.23	0.50	1.50	1.00
FUG3-3	FUG33Ag	1.00	1.00	1.00	Single Volume Source	0.23	0.77	1.77	1.00
FUG3-4	FUG34Ag	1.00	1.00	1.00	Single Volume Source	0.23	0.50	1.50	1.00

Texas Commission on Environmental Quality
Electronic Modeling Evaluation Workbook (EMEW)
Volume Source Calculations

Type of Volume Source (sigma z) <i>Pick from drop-down</i>	Release Height (middle point of vertical span) (m)	Building Name (if on/adjacent to a building) <i>Pick from drop-down</i>	Adjacent Building Height, if applicable (m)	Sigma Z (m)
Elevated Source: On or adjacent to Building	1.37	BLDG 3	9.14	4.25
Elevated Source: On or adjacent to Building	1.37	BLDG 3	9.14	4.25
Elevated Source: On or adjacent to Building	3.05	BLDG 3	9.14	4.25
Elevated Source: On or adjacent to Building	1.00	BLDG 3	9.14	4.25
Elevated Source: On or adjacent to Building	1.27	BLDG 3	9.14	4.25
Elevated Source: On or adjacent to Building	1.00	BLDG 3	9.14	4.25
Elevated Source: On or adjacent to Building	1.37	BLDG 3	9.14	4.25
Elevated Source: On or adjacent to Building	1.37	BLDG 3	9.14	4.25
Elevated Source: On or adjacent to Building	3.05	BLDG 3	9.14	4.25
Elevated Source: On or adjacent to Building	1.00	BLDG 3	9.14	4.25
Elevated Source: On or adjacent to Building	1.27	BLDG 3	9.14	4.25
Elevated Source: On or adjacent to Building	1.00	BLDG 3	9.14	4.25

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Volume Source Parameters

July 2021
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 Exflur Research Corporation

Facility:

EPN	Model ID	Modeled Release Height [m]	Modeled Length X [m]	Lateral Dimension SigmaY [m]	Vertical Dimension SigmaZ [m]	Modeling Scenario	Easting: X [m]	Northing: Y [m]	Base Elevation [m]	Source Description	Volume Source Size Justification
EP3-2	EP32	1.37	0.46	0.11	4.25	Full Grid	604670.00	3407115.00	331.90	Open-Top Washing Reactor	Reactor has top open to atmosphere with 1.5 ft diameter opening. Source footprint is equal to reactor opening. Release height is equal to height of vessel opening.
EP3-3	EP33	1.37	0.56	0.13	4.25	Full Grid	604669.00	3407117.00	331.87	Open-Top Washing Reactor	Reactor has top open to atmosphere with 1.83 ft diameter opening. Source footprint is equal to reactor opening. Release height is equal to height of vessel opening.
FUG3-1	FUG31	3.05	36.58	8.51	4.25	Full Grid	604691.00	3407124.00	332.02	Building 3 Fugitives	Fugitives from Building 3. Multiple locations for emissions from within building to exit to atmosphere. Source covers approximate footprint of building.
FUG3-2	FUG32	1.00	1.00	0.23	4.25	Full Grid	604675.00	3407111.00	331.97	Reactor Fugitives	Fugitives from reactor vessels. Footprint of source covers conservatively small 1 square-meter. Release height is also conservatively low to ground.
FUG3-3	FUG33	1.27	1.00	0.23	4.25	Full Grid	604673.00	3407112.00	331.95	Reactor Fugitives	Fugitives from reactor vessels. Footprint of source covers conservatively small 1 square-meter. Release height is also conservatively low to ground.
FUG3-4	FUG34	1.00	1.00	0.23	4.25	Full Grid	604672.00	3407114.00	331.92	Reactor Fugitives	Fugitives from reactor vessels. Footprint of source covers conservatively small 1 square-meter. Release height is also conservatively low to ground.
EP3-2	EP32Ag	1.37	0.46	0.11	4.25	Ag Grid	604670.00	3407115.00	331.90	Open-Top Washing Reactor	Reactor has top open to atmosphere with 1.5 ft diameter opening. Source footprint is equal to reactor opening. Release height is equal to height of vessel opening.
EP3-3	EP33Ag	1.37	0.56	0.13	4.25	Ag Grid	604669.00	3407117.00	331.87	Open-Top Washing Reactor	Reactor has top open to atmosphere with 1.83 ft diameter opening. Source footprint is equal to reactor opening. Release height is equal to height of vessel opening.
FUG3-1	FUG31Ag	3.05	36.58	8.51	4.25	Ag Grid	604691.00	3407124.00	332.02	Building 3 Fugitives	Fugitives from Building 3. Multiple locations for emissions from within building to exit to atmosphere. Source covers approximate footprint of building.
FUG3-2	FUG32Ag	1.00	1.00	0.23	4.25	Ag Grid	604675.00	3407111.00	331.97	Reactor Fugitives	Fugitives from reactor vessels. Footprint of source covers conservatively small 1 square-meter. Release height is also conservatively low to ground.
FUG3-3	FUG33Ag	1.27	1.00	0.23	4.25	Ag Grid	604673.00	3407112.00	331.95	Reactor Fugitives	Fugitives from reactor vessels. Footprint of source covers conservatively small 1 square-meter. Release height is also conservatively low to ground.
FUG3-4	FUG34Ag	1.00	1.00	0.23	4.25	Ag Grid	604672.00	3407114.00	331.92	Reactor Fugitives	Fugitives from reactor vessels. Footprint of source covers conservatively small 1 square-meter. Release height is also conservatively low to ground.

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Point + Flare Emissions

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 Exflur Research Corporation

Facility:

EPN	Model ID	Modeling Scenario	Pollutant	Modeled Averaging Time	Standard Type	Review Context	Intermittent Source?	Modeled Emission Rate [lb/hr]	Basis of Emission Rate	Scalars or Factors Used?
EP3-1	EP31	Full Grid	Generic	1-hr			No	1.00	Generic Modeling at 1 lb/hr	No
EP3-1	EP31	Full Grid	Generic	8-hr			No	1.00	Generic Modeling at 1 lb/hr	No
EP3-1	EP31	Full Grid	Generic	24-hr			No	1.00	Generic Modeling at 1 lb/hr	No
EP3-1	EP31	Full Grid	Generic	Annual			No	1.00	Generic Modeling at 1 lb/hr	No
EP3-1	EP31	Full Grid	Health Effects Pollutant	1-hr	Health Effects	Site Wide	No		Proposed Emission Rate	No
EP3-1	EP31Ag	Ag Grid	Generic	1-hr			No	1.00	Generic Modeling at 1 lb/hr for the Ag-Only Grid. Same source as above, just a different Receptor Grid and therefore a different UIM output.	No

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EPN	Model ID	Modeling Scenario	Pollutant	Modeled Averaging Time	Standard Type	Review Context	Intermittent Source?	Modeled Emission Rate (lb/hr)	Basis of Emission Rate	Scalars or Factors Used?
EP3-2	EP32	Full Grid	Generic	1-hr			No	1 lb/hr	Generic Modeling at 1 lb/hr	No
EP3-3	EP33	Full Grid	Generic	1-hr			No	1 lb/hr	Generic Modeling at 1 lb/hr	No
FUG3-1	FUG31	Full Grid	Generic	1-hr			No	1 lb/hr	Generic Modeling at 1 lb/hr	No
FUG3-2	FUG32	Full Grid	Generic	1-hr			No	1 lb/hr	Generic Modeling at 1 lb/hr	No
FUG3-3	FUG33	Full Grid	Generic	1-hr			No	1 lb/hr	Generic Modeling at 1 lb/hr	No
FUG3-4	FUG34	Full Grid	Generic	1-hr			No	1 lb/hr	Generic Modeling at 1 lb/hr	No
EP3-2	EP32	Full Grid	Generic	Annual			No	1 lb/hr	Generic Modeling at 1 lb/hr	No
EP3-3	EP33	Full Grid	Generic	Annual			No	1 lb/hr	Generic Modeling at 1 lb/hr	No
FUG3-1	FUG31	Full Grid	Generic	Annual			No	1 lb/hr	Generic Modeling at 1 lb/hr	No
FUG3-2	FUG32	Full Grid	Generic	Annual			No	1 lb/hr	Generic Modeling at 1 lb/hr	No
FUG3-3	FUG33	Full Grid	Generic	Annual			No	1 lb/hr	Generic Modeling at 1 lb/hr	No
FUG3-4	FUG34	Full Grid	Generic	Annual			No	1 lb/hr	Generic Modeling at 1 lb/hr	No
FUG3-1	FUG31	Full Grid	Health Effects Pollutant	1-hr	Health Effects	Site Wide	No		Proposed Emissions	No
EP3-2	EP32	Full Grid	Health Effects Pollutant	1-hr	Health Effects	Site Wide	No		Proposed Emissions	No
EP3-3	EP33	Full Grid	Health Effects Pollutant	1-hr	Health Effects	Site Wide	No		Proposed Emissions	No
FUG3-2	FUG32	Full Grid	Health Effects Pollutant	1-hr	Health Effects	Site Wide	No		Proposed Emissions	No
FUG3-3	FUG33	Full Grid	Health Effects Pollutant	1-hr	Health Effects	Site Wide	No		Proposed Emissions	No
FUG3-4	FUG34	Full Grid	Health Effects Pollutant	1-hr	Health Effects	Site Wide	No		Proposed Emissions	No
EP3-2	EP32Ag	Ag Grid	Generic	1-hr			No	1 lb/hr	Generic Modeling at 1 lb/hr for the Ag-Only Grid. Same source as above, just a different Receptor Grid and therefore a different UJM output.	No
EP3-3	EP33Ag	Ag Grid	Generic	Annual			No	1 lb/hr	Generic Modeling at 1 lb/hr for the Ag-Only Grid. Same source as above, just a different Receptor Grid and therefore a different UJM output.	No
FUG3-1	FUG31Ag	Ag Grid	Generic	Annual			No	1 lb/hr	Generic Modeling at 1 lb/hr for the Ag-Only Grid. Same source as above, just a different Receptor Grid and therefore a different UJM output.	No
FUG3-2	FUG32Ag	Ag Grid	Generic	Annual			No	1 lb/hr	Generic Modeling at 1 lb/hr for the Ag-Only Grid. Same source as above, just a different Receptor Grid and therefore a different UJM output.	No
FUG3-3	FUG33Ag	Ag Grid	Generic	Annual			No	1 lb/hr	Generic Modeling at 1 lb/hr for the Ag-Only Grid. Same source as above, just a different Receptor Grid and therefore a different UJM output.	No
FUG3-4	FUG34Ag	Ag Grid	Generic	Annual			No	1 lb/hr	Generic Modeling at 1 lb/hr for the Ag-Only Grid. Same source as above, just a different Receptor Grid and therefore a different UJM output.	No
EP3-2	EP32Ag	Ag Grid	Generic	Annual			No	1 lb/hr	Generic Modeling at 1 lb/hr for the Ag-Only Grid. Same source as above, just a different Receptor Grid and therefore a different UJM output.	No
EP3-3	EP33Ag	Ag Grid	Generic	Annual			No	1 lb/hr	Generic Modeling at 1 lb/hr for the Ag-Only Grid. Same source as above, just a different Receptor Grid and therefore a different UJM output.	No
FUG3-1	FUG31Ag	Ag Grid	Generic	Annual			No	1 lb/hr	Generic Modeling at 1 lb/hr for the Ag-Only Grid. Same source as above, just a different Receptor Grid and therefore a different UJM output.	No

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EPN	Model ID	Modeling Scenario	Pollutant	Modeled Averaging Time	Standard Type	Review Context	Intermittent Source?	Modeled Emission Rate [lb/hr]	Basis of Emission Rate	Scalars or Factors Used?
FUG3-2	FUG32Ag	Ag Grid	Generic	Annual			No	1 lb/hr	Generic Modeling at 1 lb/hr for the Ag-Only Grid. Same source as above, just a different Receptor Grid and therefore a different UJM output.	No
FUG3-3	FUG33Ag	Ag Grid	Generic	Annual			No	1 lb/hr	Generic Modeling at 1 lb/hr for the Ag-Only Grid. Same source as above, just a different Receptor Grid and therefore a different UJM output.	No
FUG3-4	FUG34Ag	Ag Grid	Generic	Annual			No	1 lb/hr	Generic Modeling at 1 lb/hr for the Ag-Only Grid. Same source as above, just a different Receptor Grid and therefore a different UJM output.	No

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Speciated Emissions

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Speciated Emissions by Model ID										
CAS #	Chemical Species	Other Species	Short-Term ESL (µg/m ³)	Long-Term ESL (µg/m ³)	Modeled Project Wide Emission Rate [lb/hr]	EP31 Rate [tpy]	Modeled Project Wide Emission Rate [tpy]	EP31 Rate [lb/hr]	Modeled Project Wide Emission Rate [lb/hr]	FUG31 Rate [tpy]
7664-39-3 (Not Defined)	hydrogen fluoride		18	8.7	0.00738	0.0323	0.0323	0.00738	0.127	0.555
7664-39-3 (For air permit reviews in agricultural areas)	hydrogen fluoride For air permit reviews in agricultural areas		3	0.6	0.00738	0.0323	0.0323	0.00738	0.127	0.555
7664-39-3 (For air permit reviews in agricultural areas with cattle)	hydrogen fluoride For air permit reviews in agricultural areas with cattle		0	0.75		0.0323	0.0323			0.555
7782-41-4	fluorine		2	0.2	1.13E-04	4.96E-04	4.96E-04	1.13E-04	0.103	0.453
353-50-4 (For air permit reviews in agricultural areas with cattle)	carbonyl fluoride For air permit reviews in agricultural areas with cattle		0	0.71		0.0534	0.0534			
76-05-1 (For air permit reviews in agricultural areas with cattle)	trifluoroacetic acid For air permit reviews in agricultural areas with cattle		0	0.71		0.0614	0.0614			
N/A	Other (Please specify):	Perfluorohexane	Provide Documentation	Provide Documentation	0.0157	0.0393	0.0393	0.0157	0.511	2.24
67-56-1	methanol		3800	2100	0.0278	4.65E-04	4.65E-04	0.0278	0.0450	0.197
335-67-1	perfluorooctanoic acid and its inorganic salts		0.05	0.005	1.95E-06	1.07E-06	1.07E-06	1.95E-06	0.137	0.598
7726-95-6	bromine		7	0.7	1.49E-05	7.84E-07	7.84E-07	1.49E-05	0.137	0.598
7647-01-0	hydrogen chloride		190	7.9	0.0227	0.0896	0.0896	0.0227		
75-73-0	carbon tetrafluoride		18000	1800	0.994	4.35	4.35	0.994		
N/A	Other (Please specify):	Perfluoro (bis-2-chloroethoxy methane)	Provide Documentation	Provide Documentation	0.0174	0.0576	0.0576	0.0174	0.115	0.503
N/A	Other (Please specify):	Perfluorodecalin	Provide Documentation	Provide Documentation	0.0106	0.0415	0.0415	0.0106	0.536	2.35
N/A	Other (Please specify):	polymers of chlorotrifluoroethylene (PCTFE)	Provide Documentation	Provide Documentation	3.33E-04	5.20E-04	5.20E-04	3.33E-04	0.0281	0.123

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Speciated Emissions

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Speciated Emissions b

CAS #	EP32 Modeled Project Wide Emission Rate [lb/hr]	EP32 Modeled Site Wide Emission Rate [lb/hr]	EP32 Modeled Project Wide Emission Rate [tpy]	EP32 Modeled Site Wide Emission Rate [tpy]	EP33 Modeled Project Wide Emission Rate [lb/hr]	EP33 Modeled Site Wide Emission Rate [lb/hr]	EP33 Modeled Project Wide Emission Rate [tpy]	EP33 Modeled Site Wide Emission Rate [tpy]	FUG32 Modeled Project Wide Emission Rate [lb/hr]	FUG32 Modeled Site Wide Emission Rate [lb/hr]	FUG32 Modeled Project Wide Emission Rate [tpy]	FUG32 Modeled Site Wide Emission Rate [tpy]	FUG33 Modeled Project Wide Emission Rate [lb/hr]	FUG33 Modeled Site Wide Emission Rate [lb/hr]	FUG33 Modeled Project Wide Emission Rate [tpy]	FUG33 Modeled Site Wide Emission Rate [tpy]	FUG34 Modeled Project Wide Emission Rate [lb/hr]	FUG34 Modeled Site Wide Emission Rate [lb/hr]	FUG34 Modeled Project Wide Emission Rate [tpy]	FUG34 Modeled Site Wide Emission Rate [tpy]
7664-39-3 (Not Defined)																				
7664-39-3 (For air permit reviews in agricultural areas)																				
7664-39-3 (For air permit reviews in agricultural areas with cattle)																				
7782-41-4																				
353-50-4 (For air permit reviews in agricultural areas with cattle)																				
76-05-1 (For air permit reviews in agricultural areas with cattle)																				
N/A																				
67-56-1	0.235	0.235	0.0318	0.0318	0.321	0.321	0.0448	0.0448												
335-67-1																				
7726-66-6																				
7647-01-0					0.00745	0.00745	0.0326	0.0326	0.00364	0.00364	0.0160	0.0160	0.00311	0.00311	0.0136	0.0136				
75-73-0																				
N/A																				
N/A																				
N/A	0.119	0.119	0.00781	0.00781	0.167	0.167	0.0111	0.0111												

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Modeling Scenarios

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Modeling Scenario	Scenario Description:
Ag Grid	Agricultural Areas receptor grid
Full Grid	Full grid used for all analyses other than those specific to "Ag Areas"

Texas Commission on Environmental Quality
Electronic Modeling Evaluation Workbook (EMEW)
Secondary Formation of PM2.5

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Facility: _____

Modeled Emission Rates for Precursors (MERPs) Demonstration Tool for Calculating Secondary PM _{2.5} Impacts						
Precursor	Project Increases (tpy)	Source Selection	Selection of Variables		MERP Value	
			Emission Rate (tpy)	Height (m)	24-hr	Annual
Nitrogen Oxide (NO _x)	0.199	worst-case			2649	10397
Sulfur Dioxide (SO ₂)	0					
					Total Secondary Value (µg/m ³)	Annual PM _{2.5}
					0.00009	0.00000

MERPs Demonstration - Justification		Applicat
A. Provide justification for selection of worst-case MERP and/or site-specific source here. Please limit your response to 2000 characters. Worst case in lieu of justifying a less conservative source		All internal comments
B. If a site-specific source is selected, provide justification for the selected emission rate variable(s) here. Please limit your response to 2000 characters.		
C. If a site specific MERP value is selected, provide justification for the selected height variable(s) here. Please limit your response to 2000 characters.		

Texas Commission on Environmental Quality
Electronic Modeling Evaluation Workbook (EMEW)
NAAQS-SPL Modeling Results

Table 3. Modeling Results for Minor NSR De Minimis

Pollutant	Averaging Time	GLCmax (µg/m ³)	De Minimis (µg/m ³)
SO ₂	1-hr		7.8*
SO ₂	3-hr		25
SO ₂	24-hr		5
SO ₂	Annual		1
PM ₁₀	24-hr	1.39E-07	5
NO ₂	1-hr	7.01000	7.5**
NO ₂	Annual	0.130	1
CO	1-hr	9.62000	2000
CO	8-hr	2.75000	500

Additional information for the De Minimis values listed above can be found at:
 * <https://www.epa.gov/sites/production/files/2015-07/documents/appwse2.pdf>
 ** https://www.tceq.texas.gov/assets/public/permitting/air/memos/guidance_1hr_no2naaqs.pdf

Texas Commission on Environmental Quality
Electronic Modeling Evaluation Workbook (EMEW)
NAAQS-SPL Modeling Results

Table 4. PM_{2.5} Modeling Results for Minor NSR De Minimis

Pollutant	Averaging Time	GLCmax (µg/m ³)	Secondary PM _{2.5} Contribution (µg/m ³)	Total Conc. = Secondary PM _{2.5} + GLCmax (µg/m ³)	De Minimis (µg/m ³)
PM _{2.5}	24-hr	0	9.01472E-05	0.00009	1.2*
PM _{2.5}	Annual	0	3.82803E-06	0.00000	0.2*

Additional information for the De Minimis values listed above can be found at:
<https://www.tceq.texas.gov/permitting/air/modeling/epa-mod-guidance.html>

Table 5. Total Concentrations for Minor NSR NAAQS (Concentrations > De Minimis)

Pollutant	Averaging Time	GLCmax (µg/m ³)	Background (µg/m ³)	Total Conc. = [Background + GLCmax] (µg/m ³)	Standard (µg/m ³)
SO ₂	1-hr		0	0	196
SO ₂	3-hr		0	0	1300
SO ₂	24-hr		0	0	365
SO ₂	Annual		0	0	80
PM ₁₀	24-hr		0	0	150
Pb	3-mo		0	0	0.15
NO ₂	1-hr		0	0	188
NO ₂	Annual		0	0	100
CO	1-hr		0	0	40000
CO	8-hr		0	0	10000

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NAAQS-SPL Modeling Results

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Table 6. Total Concentrations for Minor NSR NAAQS (Concentrations > De Minimis)

Pollutant	Averaging Time	GLCmax (µg/m ³)	Secondary PM _{2.5} Contribution (µg/m ³)	Background (µg/m ³)	Total Conc. = [Background + Secondary + GLCmax] (µg/m ³)	Standard (µg/m ³)
PM _{2.5}	24-hr		9.01472E-05	0	9.01E-05	35
PM _{2.5}	Annual		3.82803E-06	0	3.83E-06	12

Texas Commission on Environmental Quality
Electronic Modeling Evaluation Workbook (EMEW)
Unit Impact Multipliers

July 2021
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 Exflur Research Corporation

Facility:

EPN	Model ID	Modeling Scenario	Averaging Time	GLCmax ($\mu\text{g}/\text{m}^3$ per lb/hr)
EP3-1	EP31	Full Grid	1-hr	154.37
EP3-1	EP31	Full Grid	8-hr	44.09
EP3-1	EP31	Full Grid	24-hr	19.59
EP3-1	EP31	Full Grid	Annual	2.85
EP3-1	EP31Ag	Ag Grid	1-hr	120.14
EP3-2	EP32	Full Grid	1-hr	56.87
EP3-3	EP33	Full Grid	1-hr	57.54
FUG3-1	FUG31	Full Grid	1-hr	37.36
FUG3-2	FUG32	Full Grid	1-hr	57.59
FUG3-3	FUG33	Full Grid	1-hr	55.58
FUG3-4	FUG34	Full Grid	1-hr	58.87
EP3-2	EP32	Full Grid	Annual	4.06
EP3-3	EP33	Full Grid	Annual	4.10
FUG3-1	FUG31	Full Grid	Annual	2.92
FUG3-2	FUG32	Full Grid	Annual	3.86
FUG3-3	FUG33	Full Grid	Annual	3.93
FUG3-4	FUG34	Full Grid	Annual	3.98
EP3-2	EP32Ag	Ag Grid	1-hr	24.42
EP3-3	EP33Ag	Ag Grid	Annual	24.34
FUG3-1	FUG31Ag	Ag Grid	Annual	24.76
FUG3-2	FUG32Ag	Ag Grid	Annual	26.27
FUG3-3	FUG33Ag	Ag Grid	Annual	24.92
FUG3-4	FUG34Ag	Ag Grid	Annual	26.10
EP3-2	EP32Ag	Ag Grid	Annual	1.65
EP3-3	EP33Ag	Ag Grid	Annual	1.64
FUG3-1	FUG31Ag	Ag Grid	Annual	1.99
FUG3-2	FUG32Ag	Ag Grid	Annual	1.71
FUG3-3	FUG33Ag	Ag Grid	Annual	1.68
FUG3-4	FUG34Ag	Ag Grid	Annual	1.68

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Electronic Modeling Evaluation Workbook (EMEW)
Health Effect Modeling Results

July 2021
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 Exflur Research Corporation

Facility:		Modeled Health Effect Results (MERA Guidance):			Step 3	Step 4: Production		Step 4: MSS
Chemical Species	CAS Number	Averaging Time	ESL [$\mu\text{g}/\text{m}^3$]	10% ESL Step 3 Modeled GLCmax [$\mu\text{g}/\text{m}^3$]	25 % ESL Step 4 Production since most recent site wide modeling [$\mu\text{g}/\text{m}^3$]	10% ESL Step 4 Production Project Only GLCmax [$\mu\text{g}/\text{m}^3$]	50% ESL Step 4 MSS GLCmax since most recent site wide modeling [$\mu\text{g}/\text{m}^3$]	
hydrogen fluoride	4-39-3 (Not Defined)	1-hr	18	5.88				
hydrogen fluoride For air permit reviews in agricultural areas	permit reviews in agricultural areas	1-hr	3	4.03				
hydrogen fluoride For air permit reviews in agricultural areas with cattle	permit reviews in agricultural areas with cattle	Annual	0.75	0.27				
fluorine	7782-41-4	1-hr	2	3.88				
carbonyl fluoride For air permit reviews in agricultural areas with cattle	permit reviews in agricultural areas with cattle	Annual	0.71	0.03				
trifluoroacetic acid For air permit reviews in agricultural areas with cattle	permit reviews in agricultural areas with cattle	Annual	0.71	0.03				
Perfluoroheptane	N/A	1-hr	Provide Documentation	21.51				
methanol	67-56-1	1-hr	3900	37.84				
perfluorooctanoic acid and its inorganic salts	335-67-1	1-hr	0.05	0.00				
bromine	7726-95-6	1-hr	7	5.11				
hydrogen chloride	7647-01-0	1-hr	190	4.32				
hydrogen chloride	7647-01-0	Annual	7.9	0.11				
carbon tetrafluoride	75-73-0	1-hr	18000	153.45				
Perfluoro (bis-2-chloroethoxy methane)	N/A	1-hr	Provide Documentation	6.97				
Perfluorodecalin	N/A	1-hr	Provide Documentation	21.65				
polymers of chlorotrifluoroethylene (PCTFE)	N/A	1-hr	Provide Documentation	17.44				

Texas Commission on Environmental Quality

Electronic Modeling Evaluation Workbook (EMEW)

Health Effect Modeling Results

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Facility:	Modeled Hea		Step 5: Hours of Exceedance				Step 6
	25% ESL Step 4 MSS Project Only GLCmax [$\mu\text{g}/\text{m}^3$]	Full ESL Step 5 GLCmax [$\mu\text{g}/\text{m}^3$]	1X ESL GLCmax Step 5 MSS Hours of Exceedance	2X ESL GLCmax Step 5 MSS Hours of Exceedance	4X ESL GLCmax Step 5 MSS Hours of Exceedance	10X ESL GLCmax Step 5 MSS Hours of Exceedance	Was Step 6 relied on to fall out of the MERA? Yes (Verify with Permit Reviewer)
Chemical Species							
hydrogen fluoride							
hydrogen fluoride For air permit reviews in agricultural areas							
hydrogen fluoride For air permit reviews in agricultural areas with cattle							
fluorine							
carbonyl fluoride For air permit reviews in agricultural areas with cattle							
trifluoroacetic acid For air permit reviews in agricultural areas with cattle							
Perfluoroheptane							
methanol							
perfluorooctanoic acid and its inorganic salts							
bromine							
hydrogen chloride							
hydrogen chloride							
carbon tetrachloride							
Perfluoro (bis-2-chloroethoxy methane)							
Perfluorodecalin							
polymers of chlorotrifluoroethylene (PCTFE)							

Texas Commission on Environmental Quality
Electronic Modeling Evaluation Workbook (EMEW)
Health Effect Modeling Results

July 2021
 Permit No.: TBA
 Exflur Research Corporation

Facility:	Modeled Head Step 7: Site Wide				Step 7: Hours of Exceedance			
	Chemical Species	Site Wide GLCmax [$\mu\text{g}/\text{m}^3$]	Site Wide GLCni [$\mu\text{g}/\text{m}^3$]	GLCni Location Easting: X [m]	GLCni Location Northing: Y [m]	1X ESL GLCni Hours of Exceedance	2X ESL GLCmax Hours of Exceedance	4X ESL GLCmax Hours of Exceedance
hydrogen fluoride For air permit reviews in agricultural areas	3.86	1.92	605011.00	3407134.00	0	0	0	0
hydrogen fluoride For air permit reviews in agricultural areas with cattle								
fluorine	3.88	0.49	605261.00	3407184.00	0	0	0	0
carbonyl fluoride For air permit reviews in agricultural areas with cattle								
trifluoroacetic acid For air permit reviews in agricultural areas with cattle								
Perfluoroheptane								
methanol								
perfluorooctanoic acid and its inorganic salts								
bromine								
hydrogen chloride								
hydrogen chloride								
carbon tetrafluoride								
Perfluoro (bis-2-chloroethoxy methane)								
Perfluorodecalin								
polymers of chlorotrifluoroethylene (PCTFE)								

Texas Commission on Environmental Quality
Electronic Modeling Evaluation Workbook (EMEW)
Modeling File Names

July 2021
 Permit No.: TBA
 Exflur Research Corporation

Facility:

Model File Base Name	Pollutant	Averaging Time	File Extensions	Additional File Description
Exflur	All	1-hour, 8-hour, 24-hour, Annual	ADI, out, sum, P01, P08, P24, PAn	UIM analysis used with full grid
Exflur_Ag	All (in Ag Areas)	1-hour, Annual	ADI, out, sum, P01, PAn	UIM analysis used for the "Permitting in agricultural areas". Has same inputs as above, but different receptor grid input and therefore differing UIM output.
Exflur_HF_Ag	HF in Ag Areas	1-hour	ADI, out, sum, P01	Sitewide analysis for HF in agricultural areas
Exflur_Diflorine	Florine (Difluorine)	1-hour	ADI, out, sum, P01	Sitewide analysis for difluorine
WILLIAMSON_AUSFWD16M	All	All	.SFC, .PFL	TCEQ Met Files
Exflur_FullGrid	All	All	ROU	Full Grid
Exflur_Ag	All (in Ag Areas)	All	ROU	Ag Areas Receptor Grid

Application Exhibit 1A

**CONFIDENTIAL APPLICATION
MATERIALS FILED SEPARATELY**

Application Exhibit 2

TCEQ ED Administrative Materials/Correspondence

Steven Piper

From: Joel Stanford
Sent: Monday, July 12, 2021 1:58 PM
To: Steven Piper
Subject: RE: Air Permit Application Attachments for Exflur Research (Reference #423713, Confirmation #355797)

Sorry, I thought I replied to this? They included the fugitive workbooks apparently (i.e. those are the workbooks!).

From: Steven Piper <Steven.Piper@tceq.texas.gov>
Sent: Monday, July 12, 2021 1:57 PM
To: Joel Stanford <joel.stanford@tceq.texas.gov>
Subject: RE: Air Permit Application Attachments for Exflur Research (Reference #423713, Confirmation #355797)

Joel,
Were you able to look at the emission workbooks to determine whether we need a fugitive workbook?

From: Steven Piper
Sent: Friday, July 9, 2021 3:57 PM
To: Joel Stanford <Joel.Stanford@tceq.texas.gov>
Subject: RE: Air Permit Application Attachments for Exflur Research (Reference #423713, Confirmation #355797)

I put the files in your folder if you want to look at the 5 emission workbooks. They are in the Confidential section.

From: Joel Stanford <joel.stanford@tceq.texas.gov>
Sent: Friday, July 9, 2021 3:55 PM
To: Steven Piper <Steven.Piper@tceq.texas.gov>
Subject: RE: Air Permit Application Attachments for Exflur Research (Reference #423713, Confirmation #355797)

I would explain that if there are equipment leak fugitives/piping fugitives that we need the TCEQ Fugitive Calculation workbooks rather than "in-house" calculations.

It does seem that this industry would need them. What I don't know is if they already submitted those workbooks (their reference to the 5 workbooks).

From: Steven Piper <Steven.Piper@tceq.texas.gov>
Sent: Friday, July 9, 2021 3:38 PM
To: Joel Stanford <joel.stanford@tceq.texas.gov>
Subject: FW: Air Permit Application Attachments for Exflur Research (Reference #423713, Confirmation #355797)

Joel,
We received an application and according to Unit Types it needs a fugitive workbook. I contacted the company about this and below is their response. Please advise whether to move forward or if this should be incomplete.

Thank you,
Steven

From: Christopher L. Bauer <CBauer@WAID.com>
Sent: Friday, July 9, 2021 3:20 PM
To: Steven Piper <Steven.Piper@tceq.texas.gov>
Subject: Air Permit Application Attachments for Exflur Research (Reference #423713, Confirmation #355797)

Mr. Piper,

Exflur personnel contacted me regarding a request they received from you about providing the fugitive emission workbooks associated with the air permit application submitted earlier today under STEERS reference # 423713. There were five spreadsheet workbooks that were attached to the application. The COR and the list of attachments for this application in STEERS confirms that those five workbooks were attached to the application submittal (see attachments to this email). Please help me to understand the additional information that you still need.

Thank you,

Chris L. Bauer, P.E.
Principal Engineer
Waid Corporation dba Waid Environmental
13785 Research Blvd., Suite 100
Austin, TX 78750
(512) 255-9999 ext. 219 Fax: (512) 255-8780 Mobile (512) 497-5313
<http://www.waid.com> email: cbauer@waid.com

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Steven Piper

From: Johnny Bowers
Sent: Friday, July 9, 2021 1:38 PM
To: Steven Piper
Subject: Please process ePermits project 331049. Thanks!

Follow Up Flag: Follow up
Flag Status: Flagged

Johnny Bowers, Team Leader
Air Permits Initial Review Team
Air Permits Division, MC 161
Office of Air
Texas Commission on Environmental Quality
Phone: (512) 239-6770
Fax: (512) 239-7815
E-mail: johnny.bowers@tceq.texas.gov
Web site: www.tceq.texas.gov
Please consider whether it is necessary to print this e-mail
How are we doing? www.tceq.texas.gov/customersurvey



Texas Commission on Environmental Quality
Case-by-Case New Permit

Site Information (Regulated Entity)

What is the name of the site to be authorized?	EXFLUOR RESEARCH
Does the site have a physical address?	Yes
Physical Address	
Number and Street	1100 CR 236
City	FLORENCE
State	TX
ZIP	76527
County	WILLIAMSON
Latitude (N) (##.#####)	30.791
Longitude (W) (-###.#####)	-97.903
Primary SIC Code	2869
Secondary SIC Code	
Primary NAICS Code	325998
Secondary NAICS Code	
Regulated Entity Site Information	
What is the Regulated Entity's Number (RN)?	RN110969227
What is the name of the Regulated Entity (RE)?	EXFLUOR RESEARCH
Does the RE site have a physical address?	Yes
Physical Address	
Number and Street	1100 CR 236
City	FLORENCE
State	TX
ZIP	76527
County	WILLIAMSON
Latitude (N) (##.#####)	30.792
Longitude (W) (-###.#####)	-97.906
Facility NAICS Code	325998
What is the primary business of this entity?	SPECIALTY CHEMICAL MANUFACTURING

Customer (Applicant) Information

How is this applicant associated with this site?	Operator
What is the applicant's Customer Number (CN)?	CN602696791
Type of Customer	Corporation
Full legal name of the applicant:	
Legal Name	Exfluor Research Corporation

Texas SOS Filing Number	41513100
Federal Tax ID	742078890
State Franchise Tax ID	17420788907
State Sales Tax ID	
Local Tax ID	
DUNS Number	95108437
Number of Employees	
Independently Owned and Operated?	Yes
I certify that the full legal name of the entity applying for this permit has been provided and is legally authorized to do business in Texas.	Yes
Responsible Authority Contact	
Organization Name	Exfluor Research Corporation
Prefix	MR
First	Thomas
Middle	
Last	Bierschenk
Suffix	
Credentials	
Title	Vice President
Responsible Authority Mailing Address	
Enter new address or copy one from list:	
Address Type	Domestic
Mailing Address (include Suite or Bldg. here, if applicable)	2350 DOUBLE CREEK DR
Routing (such as Mail Code, Dept., or Attn:)	
City	ROUND ROCK
State	TX
ZIP	78664
Phone (###-###-####)	5123109044
Extension	
Alternate Phone (###-###-####)	
Fax (###-###-####)	5123109045
E-mail	bierschenk_t@exfluor.com

Responsible Official Contact

Person TCEQ should contact for questions about this application:

Same as another contact?

Organization Name

Prefix

First

Middle

Last

Suffix

CN602696791, Exfluor Research Corporation RESPONSIBLE AUTHORITY

Exfluor Research Corporation

MR

Thomas

Bierschenk

Credentials	
Title	Vice President
Enter new address or copy one from list:	
Mailing Address	
Address Type	Domestic
Mailing Address (include Suite or Bldg. here, if applicable)	2350 DOUBLE CREEK DR
Routing (such as Mail Code, Dept., or Attn:)	
City	ROUND ROCK
State	TX
ZIP	78664
Phone (###-###-####)	5123109044
Extension	
Alternate Phone (###-###-####)	
Fax (###-###-####)	5123109045
E-mail	bierschenk_t@exflur.com

Technical Contact

Person TCEQ should contact for questions about this application:	
Same as another contact?	CN602696791, Exflur Research Corporation RESPONSIBLE AUTHORITY
Organization Name	Exflur Research Corporation
Prefix	MR
First	Thomas
Middle	
Last	Bierschenk
Suffix	
Credentials	
Title	Vice President
Enter new address or copy one from list:	
Mailing Address	
Address Type	Domestic
Mailing Address (include Suite or Bldg. here, if applicable)	2350 DOUBLE CREEK DR
Routing (such as Mail Code, Dept., or Attn:)	
City	ROUND ROCK
State	TX
ZIP	78664
Phone (###-###-####)	5123109044
Extension	
Alternate Phone (###-###-####)	
Fax (###-###-####)	5123109045
E-mail	bierschenk_t@exflur.com

Case by Case General Information-New Sites

1) Is this application a re-submittal of a project voided within the last six months?	No
2) Is this application for a portable facility?	No
3) What type of new authorization are you applying for?	CONSTRUCT
3.1. Are there any associated federal Prevention of Significant Deterioration (PSD), Nonattainment (NA), or major source hazardous pollutants Federal Clean Air Act § 112(g) permits?	No
3.2. Are there any Permits by Rule (PBR) or standard exemptions associated to be incorporated?	No
3.3. List any PBR or standard exemptions with date claimed that need to be referenced that the TCEQ was previously not required to be notified of (unregistered PBR and standard exemptions).	None
3.4. List any PBR or standard exemptions with date claimed that need to be consolidated that the TCEQ was previously not required to be notified of (unregistered PBR and standard exemptions).	None
3.5. Are there any standard permits associated with this permit to be incorporated?	No
3.6. Are there any other permits to be consolidated into this permit?	No
3.7. Are there any other permits that should be voided as part of this application for any reason other than consolidation into this permit?	No

Case by Case Application Requirements

1) Is a completed Form PI-1 General Application attached with all supporting documentation?	Yes
2) Is an air quality impacts demonstration required?	Yes
2.1. Is the application for a major New Source Review (federal or PSD) permit?	No
3) Do the emissions from the proposed facility comply with all rules and regulations of the commission and with the intent of the Texas Clean Air Act (TCAA), including protection of the health and property of the public?	Yes
4) Does the application contain provisions for measuring emissions of significant air contaminants?	Yes
5) Does the application contain a best available control technology (BACT) evaluation for all facilities subject to the TCAA?	Yes
6) Is the proposed facility subject to a New Source Performance Standard (Title 40	No

Code of Federal Regulation (CFR) Part 60 (NSPS)?	
7) Is the proposed facility subject to a National Emission Standard for Hazardous Air Pollutants (Title 40 CFR Part 61) (NESHAP)?	No
8) Is the proposed facility subject to National Emission Standard for Hazardous Air Pollutants (Title 40 CFR Part 63) (MACT) evaluation required?	No
9) Is a nonattainment review (NA) and/or prevention of significant deterioration (PSD) evaluation required?	No
10) Does the application contain information to demonstrate that the proposed facility will achieve the performance specified in its permit?	Yes
11) If subject to Chapter 101, Subchapter H, Division 3 (relating to Mass Emissions Cap and Trade Program), the proposed facility, group of facilities, or account must obtain allowances to operate. Have the allowances been identified for the facilities contained in the application?	NA
12) Is the facility an affected source (as defined in 116.15(1)) for hazardous air pollutants?	No

Case by Case Table 30

1) Do nonattainment permitting requirements apply to this application?	No
2) Do prevention of significant deterioration permitting requirements apply to this application?	No
3) Enter the total permit application fee (non-renewal) based on your estimated capital cost.	6636

Expedite Case by Case

1) Per Texas Health and Safety Code, Section 382.05155, does the applicant want to expedite the processing of this application?	Yes
1.1. Can the applicant demonstrate that the purpose of this application will benefit the economy of this state or an area of this state?	Yes
1.2. Select the applicable expedited surcharge	10000

Case by Case Attachments

If the file size for any attachment is greater than 50MB, then combine all non-excel files into one PDF document and use the FTP process to create an account at <https://ftps.tceq.texas.gov/ut.php>, upload files, and share to <https://ftps.tceq.texas.gov/ut.php>

important;">APIRT@tceq.texas.gov. Detailed instructions can be found at https://ftps.tceq.texas.gov/help/.

Attach Form PI-1 General Application.

[File Properties]

File Name NSR_WORKBOOK_20210709_112139.xlsx
 Hash 6F37CB7039FEB6D3DF026AB24A453416FBAC03E86FAA318802972F158CC7C2D7
 MIME-Type application/vnd.openxmlformats-officedocument.spreadsheetml.sheet
 Confidential No

Attach Electronic Modeling Evaluation Workbook (EMEW), MERA, or Protocol.

[File Properties]

File Name EMEW_MERA_20210709_112900.xlsx
 Hash 5D3FF980EB085A21E3C75F01082F89FB9BCA5BDA6FBDA072A9D2A1AD5E740D28
 MIME-Type application/vnd.openxmlformats-officedocument.spreadsheetml.sheet
 Confidential No

Attach executive summary, introduction, and process description documents.

Attach area map, plot plan, and process flow diagram.

Attach federal applicability description.

Attach the Best Available Control Technology (BACT) demonstration.

Attach Emission Calculation.

[File Properties]

File Name EMISSIONS_CALCULATIONS_20210709_115504.xlsx
 Hash 9D841CB523A192E35F0FC9DCFC7A0D0E37C6E46FB3F19BE589C6F4E7173FD308
 MIME-Type application/vnd.openxmlformats-officedocument.spreadsheetml.sheet
 Confidential Yes

[File Properties]

File Name EMISSIONS_CALCULATIONS_20210709_115526.xlsx
 Hash D0202B735EE1BD0B787DD4A37091812C743F365221E528F808BF60FD8BF187C8
 MIME-Type application/vnd.openxmlformats-officedocument.spreadsheetml.sheet
 Confidential Yes

[File Properties]

File Name EMISSIONS_CALCULATIONS_20210709_115607.xlsx
 Hash 7BFFCA1C6B3B6E3CB01AA800A45526C520D6F11EF65AE05BEC433AC971C1E201
 MIME-Type

application/vnd.openxmlformats-officedocument.spreadsheetml.sheet

Confidential Yes

[File Properties]

File Name EMISSIONS_CALCULATIONS_20210709_115634.xlsx

Hash 5EFA1558C6918F66492F8797214677797B1F8A5378ED04810BC57B3CD2C8597F

MIME-Type application/vnd.openxmlformats-officedocument.spreadsheetml.sheet

Confidential Yes

[File Properties]

File Name EMISSIONS_CALCULATIONS_20210709_115700.xlsx

Hash 1BCED086203100C850FE6A396C3C65EBF80AC60A1F11D62D0693DB1E110C632C

MIME-Type application/vnd.openxmlformats-officedocument.spreadsheetml.sheet

Confidential Yes

Attach Material balance documentation.

Attach all equipment tables.

Attach netting forms (1F, 2F, 3F, and 4F).

Attach any other necessary information needed to complete the permit.

[File Properties]

File Name OTHER_INFORMATION_20210709_115857.pdf

Hash 05E85B8C11D7C5D816D65448683418717E792364094ABDF8F2B0F46950CB11D0

MIME-Type application/pdf

Confidential No

[File Properties]

File Name OTHER_INFORMATION_20210709_120059.pdf

Hash 65A919CE5A64AA617646562167D0D61C8E30F1BE46429FDA9AD25FDA58D48A7A

MIME-Type application/pdf

Confidential Yes

An additional space to attach any other necessary information needed to complete the permit.

Certification

The electronic signature below indicates that the Responsible Official has knowledge of the facts herein set forth and that the same are true, accurate, and complete to the best of my knowledge and belief. I further state that to the best of my knowledge and belief, the project for which application is made will not in any way violate any provision of the Texas Water Code (TWC), Chapter 7, Texas Clean Air Act (TCAA), as amended, or any of the air quality rules and regulations of the Texas Commission on Environmental Quality or any local governmental ordinance or resolution enacted pursuant to the TCAA. I further state that I understand my signature indicates that this application meets all applicable nonattainment, prevention of significant deterioration, or major source of hazardous air pollutant permitting requirements. I further state that I have read and understand TWC 7.177-7.183, which defines CRIMINAL OFFENSES for certain violations, including

intentionally or knowingly making or causing to be made false material statements or representations in this application, and TWC 7.187, pertaining to CRIMINAL PENALTIES.

1. I am Tom R Bierschenk, the owner of the STEERS account ER046363.
2. I have the authority to sign this data on behalf of the applicant named above.
3. I have personally examined the foregoing and am familiar with its content and the content of any attachments, and based upon my personal knowledge and/or inquiry of any individual responsible for information contained herein, that this information is true, accurate, and complete.
4. I further certify that I have not violated any term in my TCEQ STEERS participation agreement and that I have no reason to believe that the confidentiality or use of my password has been compromised at any time
5. I understand that use of my password constitutes an electronic signature legally equivalent to my written signature.
6. I also understand that the attestations of fact contained herein pertain to the implementation, oversight and enforcement of a state and/or federal environmental program and must be true and complete to the best of my knowledge.
7. I am aware that criminal penalties may be imposed for statements or omissions that I know or have reason to believe are untrue or misleading.
8. I am knowingly and intentionally signing Case-by-Case New Permit.
9. My signature indicates that I am in agreement with the information on this form, and authorize its submittal to the TCEQ.

OPERATOR Signature: Tom R Bierschenk OPERATOR

Account Number:	ER046363
Signature IP Address:	67.78.38.158
Signature Date:	2021-07-09
Signature Hash:	3999B7D0E07A5CADF7A51398B9B90B705A15BD76625FD0BC562A845690DD4272
Form Hash Code at time of Signature:	ACCAA73F0016387B711C8A3F4F7FB0DD013B29B601FEFF2D6507B55D4734929B

Fee Payment

Transaction by:	The application fee payment transaction was made by ER046363/Tom R Bierschenk
Paid by:	The application fee was paid by TOM BIERSCHEK
Fee Amount:	\$6636.00
Paid Date:	The application fee was paid on 2021-07-09
Transaction/Voucher number:	The transaction number is 582EA000439577 and the voucher number is 519262

Fee Payment

Transaction by:	The surcharge fee payment transaction was made by ER046363/Tom R Bierschenk
Paid by:	The surcharge fee was paid by TOM BIERSCHEK
Fee Amount:	\$10000.00

Paid Date:

The surcharge fee was paid on 2021-07-09

Transaction/Voucher number:

The transaction number is 582EA000439577 and the voucher number is 519263

Submission

Reference Number:

The application reference number is 423713

Submitted by:

The application was submitted by ER046363/Tom R Bierschenk

Submitted Timestamp:

The application was submitted on 2021-07-09 at 13:24:13 CDT

Submitted From:

The application was submitted from IP address 67.78.38.158

Confirmation Number:

The confirmation number is 355797

Steers Version:

The STEERS version is 6.44

Additional Information

Application Creator: This account was created by Christopher L Bauer

Steven Piper

From: Steven Piper
Sent: Monday, July 12, 2021 2:57 PM
To: Joel Stanford; Chad Dumas; Daniel Jamieson; Matthew Kovar
Subject: New Project Assignment - Currently in Initial Review Process

165848_331049 is located at Z:\Mechanical-Coatings\Joel Stanford. Please assign a reviewer and move the project folder to Z:\Mechanical-Coatings\Assigned Reviewer's Folder.

This project has been identified as an:

- Expedite Surcharge (SB1756)

Thank you!

Steven Piper

From: Steven Piper
Sent: Monday, July 12, 2021 2:55 PM
To: RFCAIR11
Subject: Site Review/Request for Comments for Project Number 331049
Attachments: RFC-331049.docx

PLEASE DO NOT RESPOND TO THE PERSON SENDING THIS EMAIL.

This is a request for comments. Please submit comments to the individual and within the specified time frame as identified in the attached file.

City of Florence

 Search

- [Water Conservation](#)
- [City Government](#)
- [Departments](#)
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- [Events/Attractions](#)
- [Code of Ordinances](#)

- [Digital Archives "The Florence Vidette"](#)
- [Hours and Location](#)
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- [E Books with SimplyE](#)

[Home](#) » [Departments](#) » [Eula Hunt Beck Florence Public Library](#) » Hours and Location


Hours and Location

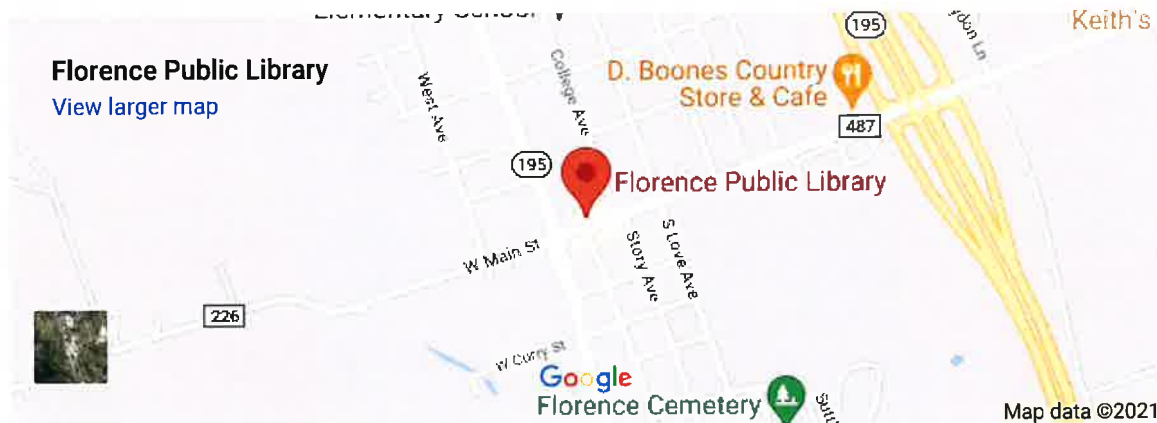
Eula Hunt Beck Florence Public Library

207 East Main Street

PO Box 430

Florence, Texas 76527

254-793-2672 



Hours of Operation-

Monday 9:30 – 1:00 and 1:30 – 5:00 pm

Tuesday 9:30 – 1:00 and 1:30 – 5:00 pm

Wednesday 9:30 – 1:00 and 1:30 – 3:30 pm

Thursday 9:30 – 1:00 and 1:30 – 5:00 pm

Friday 9:30 – 1:00 and 1:30 – 5:00 pm

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Departments

- [Building Services/Permits](#)
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- [Purchasing](#)
- [Eula Hunt Beck Florence Public Library](#)
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- [Planning and Zoning](#)
- [Public Works Department](#)

City Directory

- [Building Services/Permits](#)
- [City Secretary/Finance/HR](#)
- [Planning and Zoning Commission](#)
- [City Council](#)
- [Municipal Court](#)
- [Police Department](#)
- [Public Works Department](#)
- [Utilities](#)

Events/Attractions

- [Prehistoric Texas](#)
- [Annual Christmas Tree Lighting-December 3, 2021](#)
- [National Night Out Annual Event October 5, 2021](#)
- [The Gault School of Archaeological Research](#)
- [Spring City Wide Clean-Up- April 24, 2021](#)
- [City of Florence Neighborhood Watch Program](#)

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Steven Piper

From: Cara Hill
Sent: Tuesday, July 20, 2021 8:52 AM
To: Steven Piper
Subject: RE: EXFLUOR RESEARCH Project 331049

Hi Steven,

The Williamson County Sun is fine for the English language notice. It looks like El Mundo is distributed in Austin and San Antonio so it would not be in the County or Municipality of the plant. If there is no Spanish paper in Williamson County, then they don't need to publish the Spanish notice.

Thanks,
Cara

How is our customer service? www.tceq.texas.gov/customersurvey

From: Steven Piper <Steven.Piper@tceq.texas.gov>
Sent: Tuesday, July 20, 2021 8:25 AM
To: Cara Hill <Cara.Hill@Tceq.Texas.Gov>
Subject: FW: EXFLUOR RESEARCH Project 331049

Hello Cara,
The applicant below emailed me to ask to approve of the newspaper they wanted to publish in. Johnny Bowers advised me to refer to the technical individual who is working on the application.
Thanks,
Steven

From: luke.bernhard@exfluor.com <luke.bernhard@exfluor.com>
Sent: Monday, July 19, 2021 4:50 PM
To: Steven Piper <Steven.Piper@tceq.texas.gov>
Subject: RE: EXFLUOR RESEARCH

Sir,

I just want to confirm with you about publishing our public notices in the Williamson County Sun and in El Mundo will suffice for our newspaper ads and that they will be accepted. Just want to make sure we publish in a newspaper that will be accepted by TCEQ for this project. Thanks you.

Luke Bernhard
Exfluor Research
EHS Manager
Round Rock, Texas
C: 512-762-6622
O: 512-310-9044
exfluor.com

From: Steven Piper <Steven.Piper@tceq.texas.gov>
Sent: Friday, July 16, 2021 10:31 AM
To: luke.bernhard@exfluor.com
Subject: RE: EXFLUOR RESEARCH

Here you go sir

From: luke.bernhard@exfluor.com <luke.bernhard@exfluor.com>
Sent: Friday, July 16, 2021 10:24 AM
To: Steven Piper <Steven.Piper@tceq.texas.gov>
Subject: RE: EXFLUOR RESEARCH

Mr. Piper,

I see that the project #331049 Permit number 165848 has been marked administratively complete as of 7/14/21. I was wondering where I can get the updated public notice form and public notice packet. I just want to make sure that the small change to the location on the map got updated to the correct location as well. Thanks.

Luke Bernhard
Exfluor Research
EHS Manager
Round Rock, Texas
C: 512-762-6622
O: 512-310-9044
exfluor.com

From: Steven Piper <Steven.Piper@tceq.texas.gov>
Sent: Tuesday, July 13, 2021 3:31 PM
To: luke.bernhard@exfluor.com
Subject: RE: EXFLUOR RESEARCH

Yes I attached the previous one

From: luke.bernhard@exfluor.com <luke.bernhard@exfluor.com>
Sent: Tuesday, July 13, 2021 3:25 PM
To: Steven Piper <Steven.Piper@tceq.texas.gov>
Subject: RE: EXFLUOR RESEARCH

Like an excel spreadsheet?

Luke Bernhard
Exfluor Research
EHS Manager
Round Rock, Texas
C: 512-762-6622
O: 512-310-9044
exfluor.com

From: Steven Piper <Steven.Piper@tceq.texas.gov>
Sent: Tuesday, July 13, 2021 2:59 PM

To: luke.bernhard@exfluor.com
Subject: RE: EXFLUOR RESEARCH

Mr. Bernhard,
Would you mind emailing me an workbook showing the updated coordinates?
Thank you,
Steven

From: luke.bernhard@exfluor.com <luke.bernhard@exfluor.com>
Sent: Tuesday, July 13, 2021 2:49 PM
To: Steven Piper <Steven.Piper@tceq.texas.gov>
Cc: bierschenk_t@exfluor.com
Subject: RE: EXFLUOR RESEARCH

Mr. Piper,

The pin for the map is close to the location of our facility, however it is not where our facility is located. The following map indicates that the outline of our property boundary, and the center gray location is approximately where the building will be located. The address for the facility will be 1100 CR 236, Florence, Texas 76527.

The current location on the hyperlink is off just a little bit and doesn't represent the facility location.

The following corners have coordinates of:

Southeast corner
30° 47' 28.3194" N
97° 54' 11.5194" W

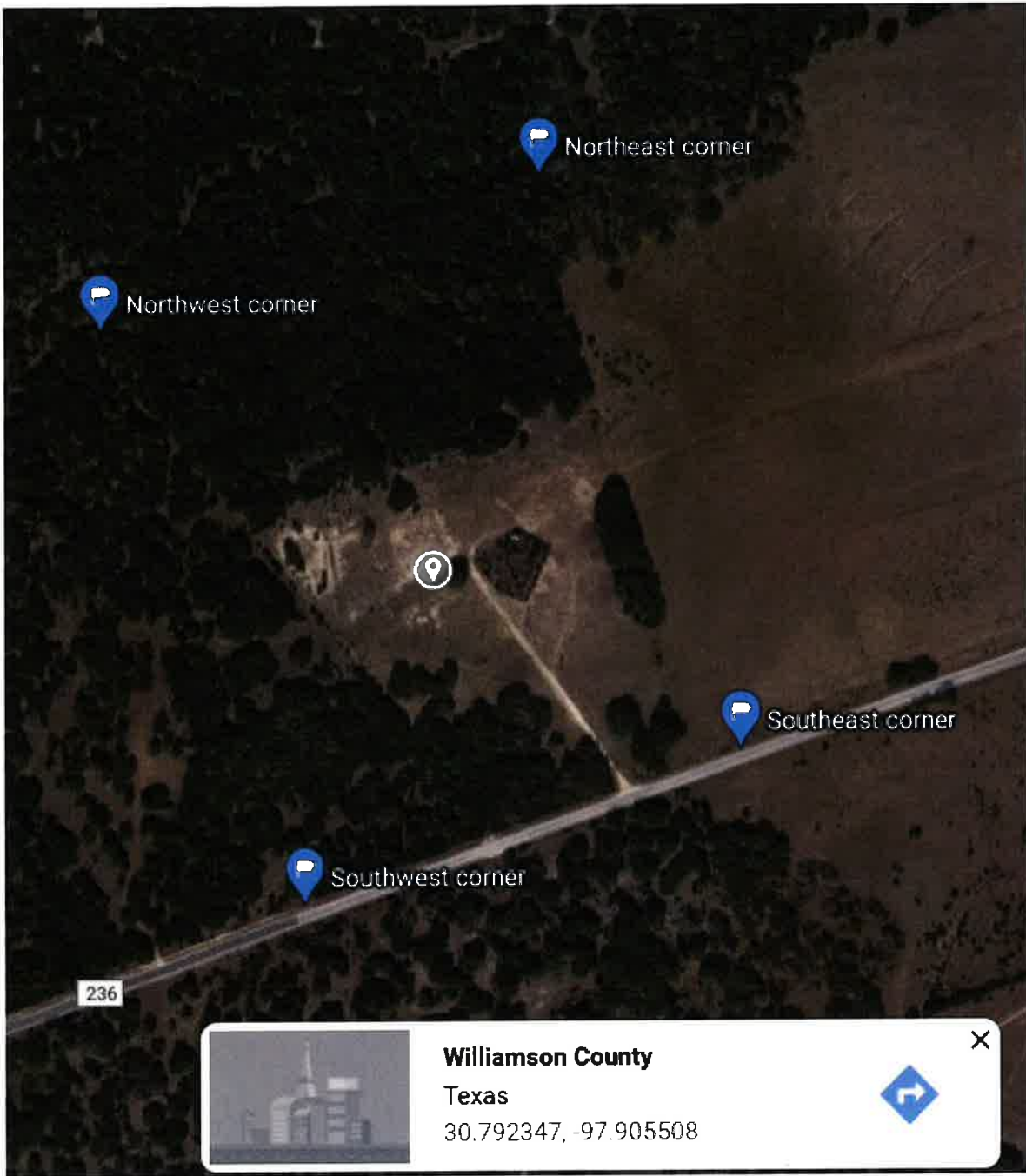
Northwest corner
30° 47' 38.04" N
97° 54' 28.8" W

And then the other corners are below:

Northwest Corner
30° 47' 41.6394" N
97° 54' 16.92" W

Southwest corner
30° 47' 24.7194" N
97° 54' 23.04"W

Please let me know if you have any questions.



Luke Bernhard
Exfluor Research
EHS Manager
Round Rock, Texas
C: 512-762-6622
O: 512-310-9044
exfluor.com

From: bierschenk_t@exfluor.com <bierschenk_t@exfluor.com>
Sent: Tuesday, July 13, 2021 12:48 PM
To: luke.bernhard@exfluor.com
Subject: FW: EXFLUOR RESEARCH

From: Steven Piper <Steven.Piper@tceq.texas.gov>
Sent: Monday, July 12, 2021 4:26 PM
To: BIERSCHENK_T@EXFLUOR.COM
Subject: EXFLUOR RESEARCH

TCEQ Public Notice DRAFT - Air Permit

Please see attached:

We have attached a draft portion of the Notice of Receipt of Application and Intent to Obtain a Permit, which contains information relevant to your application. The public notice is a legally approved document and only the items listed below are subject to approval/correction. If draft approval is not received within 2 working days, the notice package will be filed with the Chief Clerks' office "As Is". Please review the following information carefully and provide us with any corrections as soon as possible:

Facility address or driving directions to the facility

Hyperlink for the map to facility - please confirm the map shows the general vicinity of the facility

Contaminants list

Public viewing place (must be in the same county as the facility and may be required to have internet access)

For renewal applications, check all previous permitting actions to make sure they are listed in example A

Contact person and contact information

Big or small business status (If your answers on your application indicate that you qualify as a small business, you will not receive Example B with your draft or final package)

Alternative Language Requirement (see below)

If you determine that you must meet the alternative language notice requirements, you are responsible for ensuring that the publication in the alternative language is complete and accurate in that language. Spanish notice templates are available through the Air Permits Division Web site at www.tceq.state.tx.us/permitting/air/nav/air_publicnotice.html. All italic notes should be replaced with the corresponding Spanish translations for the specific application and published in the alternative language publication.

A delinquent fee/penalty check will be performed before declaring your application administratively complete. Please do not publish until your application has been declared administratively complete or you may be required to re-publish. Once declared administratively complete you will receive an email containing an administratively complete letter and public notice package. Then we will file the original notice package with the Chief Clerk for mailing.

Please reply to send approval via e-mail to and copy to: apirt@tceq.state.tx.us

Your prompt response is appreciated.



Virus-free. www.avast.com

Steven Piper

From: Steven Piper
Sent: Wednesday, July 14, 2021 9:06 AM
To: OCC-NSR; R6AirPermitsTX@epa.gov; BIERSCHEK_T@EXFLUOR.COM
Cc: RFCAIR11
Subject: INITIAL, Exflur Research Corporation, Project: 331049, Permit(s): 165848,
Attachments: EXFLUOR Spanish.docx; Exflur PN.docx

Please see Public Notice attached.

From: Joel Stanford
Sent: Thursday, July 15, 2021 9:52 AM
To: Christopher L. Bauer
Cc: Cara Hill; Ariel Ramirez
Subject: RE: Exflur Research - Florence- Initial Permit App - NSR#165848

Thank you!

From: Christopher L. Bauer <CBauer@WAID.com>
Sent: Thursday, July 15, 2021 9:32 AM
To: Joel Stanford <joel.stanford@tceq.texas.gov>
Subject: FW: Exflur Research - Florence- Initial Permit App - NSR#165848

Joel,

Thank you and your team for your work on the Exflur Research air permit application. I am sending you this email so that you will have my contact information in case you need to contact me while Joerg Windolph is out of the office. Please let me know if there are any items I need to help address.

Thanks,

Chris L. Bauer, P.E.
Principal Engineer
Waid Corporation dba Waid Environmental
13785 Research Blvd., Suite 100
Austin, TX 78750
(512) 255-9999 ext. 219 Fax: (512) 255-8780 Mobile (512) 497-5313
<http://www.waid.com> email: cbauer@waid.com

CONFIDENTIALITY NOTICE

The information contained in this electronic mail is strictly confidential, attorney work product, or subject to the Attorney-Client Privilege. This transmission is intended only for the addressee(s) named. You are hereby notified that any use, disclosure, dissemination, distribution, copying, or taking of any action because of this information by any party other than the addressee(s), is strictly prohibited. If you have received this transmission in error, please notify the sender by email, or call (512) 255-9999 immediately.

From: Joel Stanford <joel.stanford@tceq.texas.gov>
Sent: Wednesday, July 14, 2021 9:33 AM
To: Joerg Windolph <JWindolph@WAID.com>; Steven DeNero <SDeNero@WAID.com>
Cc: Cara Hill <Cara.Hill@Tceq.Texas.Gov>; Ariel Ramirez <Ariel.Ramirez@Tceq.Texas.Gov>
Subject: RE: Exflur Research - Florence- Initial Permit App - NSR#165848

Thanks, Joerg! We'll reach out to Chris if we have anything project related during that time.

From: Joerg Windolph <JWindolph@WAID.com>
Sent: Wednesday, July 14, 2021 9:26 AM
To: Joel Stanford <joel.stanford@tceq.texas.gov>; Steven DeNero <SDeNero@WAID.com>
Cc: Cara Hill <Cara.Hill@Tceq.Texas.Gov>; Ariel Ramirez <Ariel.Ramirez@Tceq.Texas.Gov>
Subject: RE: Exflur Research - Florence- Initial Permit App - NSR#165848

Joel,

Thank you for the explanation. We understand that the review time depends on several factors and cannot be predicted beforehand. We will do everything in our power to speed up the review process by responding quickly to any questions or issues raised by TCEQ personnel. We are looking forward to working with you, Cara, and Ariel on this project.

Just for your information, I will be on vacation from July 19, 2021 and returning August 2, 2021. However, Chris Bauer should be able to help you with any project related questions and Steve DeNero should be able to help with modeling questions during that time.

Thank you,

Joerg Windolph, P.E.
Principal Engineer

Waid Environmental

13785 Research Blvd., Suite 100
Austin, Texas 78750
Office: 512-255-9999
Cell: 512-550-8147
<http://www.waid.com>

Privilege and Confidentiality Notice

The following electronic message contains information that should be treated as confidential or privileged. The information is intended to be for the use of the individual or entity named above. If you are not the intended recipient, be aware that any disclosure, copying, distribution or use of the contents of this message is prohibited. If you have received this electronic message in error, please notify us immediately by telephone at (512) 255-9999.

From: Joel Stanford <joel.stanford@tceq.texas.gov>
Sent: Tuesday, July 13, 2021 2:40 PM
To: Joerg Windolph <JWindolph@WAID.com>; Steven DeNero <SDeNero@WAID.com>
Cc: Cara Hill <Cara.Hill@Tceq.Texas.Gov>; Ariel Ramirez <Ariel.Ramirez@Tceq.Texas.Gov>
Subject: Exflur Research - Florence- Initial Permit App - NSR#165848

Hi Joerg,

We were transferred this project yesterday, and I've assigned it to Cara Hill (CC'd) with Ariel Ramirez as co-assignee to help with the issuance timeframe.

We did notice the proposed timeline for issuance and wanted to temper expectations on that end. 3.5 months is about as fast as any expedited initial permit has ever been done, and while we typically beat Air Permits average timelines on my team by a great deal, fast initial permit applications skew more towards 4.5 months in good cases, provided rapid applicant responses to deficiencies, quickly resolved modeling issues, and so forth. Projects with a lot of deficiencies, BACT issues, and so forth can push out to 5-6 months and beyond.

We are willing to have a call/Teams meeting with the Applicant to try and sketch out and explain a timeline for this, and we do certainly understand their need for rapid issuance. We will seek to get their permit in hand relatively quickly and as close to their goal as we can. Responsiveness on the applicant's end will help greatly with this. Let me know if you have any questions or would like to discuss further.

Regards,

Joel Stanford
Team Leader - Expedited Team
Air Permits Division
Texas Commission on Environmental Quality
Mail Code: MC-163, PO Box 13087
Austin, Texas 78711-3087



How are we doing? Fill out our online customer satisfaction survey at: www.tceq.texas.gov/customersurvey

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Application Exhibit 3

TCEQ ED – Declaration of Administrative
Completeness & Notice of Receipt of
Application and Intent to Obtain Air Permit
(NORI) Public Notice Documents

Jon Niermann, *Chairman*
Emily Lindley, *Commissioner*
Bobby Janecka, *Commissioner*
Toby Baker, *Executive Director*



CID 124292

TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

Protecting Texas by Reducing and Preventing Pollution

July 14, 2021

DR THOMAS BIERSCHENK PHD
VICE PRESIDENT
EXFLUOR RESEARCH CORPORATION
2350 DOUBLE CREEK DR
ROUND ROCK TX 78664-3801

Re: Declaration of Administrative Completeness Small Business Stationary Source Permit Application
Permit Number: 165848
Exflur Research Corporation
Exflur Research
Florence, Williamson County
Customer Reference Number: CN602696791
Regulated Entity Number: RN110969227

Dear Dr. Bierschenk:

The Texas Commission on Environmental Quality (TCEQ) has declared the above-referenced application, received on July 9, 2021, administratively complete on July 14, 2021. We also understand you have represented that this application is for a small business stationary source.

You are now required to publish notice of your proposed activity. To help you meet the regulatory requirements associated with this notice, we have included the following items:

- Notices for Newspaper Publication (Examples A)
- Sign Posting Example (Example C)
- Public Notice Checklist
- Instructions for Public Notice
- Affidavit of Publication for Air Permitting (Form TCEQ-20533) and
- Alternative Language Affidavit of Publication for Air Permitting (Form TCEQ-20534)
- Web link to download Public Notice Verification Form (refer to Public Notice Instructions)
- Notification List

Please note that it is very important that you follow all directions in the enclosed instructions. If you do not, you may be required to republish the notice. Some common errors are the unauthorized changing of notice wording or font, omission of air contaminants, and inaccurate plant site location information represented in the application. Additional information can be found at www.tceq.texas.gov/permitting/air/bilingual/how1_2_pn.html or **if you have any questions, please contact us before you proceed with publication.**

A "Public Notice Checklist" is enclosed which notes the time limitations for each step of the public notice process. **The processing of your application may be delayed if these time limitations are not met (i.e.; submitting proof of publication of the notice within 10 business days after publication, affidavits of publication within 30 calendar days after the date of publication, and public notice verification form within 10 business days after the end of the designated comment period).** This checklist should be used as a tool in conjunction with the enclosed, detailed instructions.

P.O. Box 13087 · Austin, Texas 78711-3087 · 512-239-1000 · tceq.texas.gov

How is our customer service? tceq.texas.gov/customersurvey

APP-00188

Dr. Thomas Bierschenk PhD
Page 2
July 14, 2021

Re: Permit: 165848

If you do not comply with **all** requirements described in the instructions, the TCEQ cannot continue processing the application and may take other actions. Please note that as your application undergoes the technical review, we may request additional information.

If you have any questions regarding publication requirements, please contact the Office of the Chief Clerk at (512) 239-3300. If you have any other questions, please contact Mr. Steven Piper at (512) 239-1589.

Sincerely,



Johnny D. Bowers, Team Leader
Air Permits Initial Review Team
Air Permits Division
Texas Commission on Environmental Quality

Enclosures

cc: Air Section Manager, Region 11 - Austin
Air Permits Section Chief, New Source Review Section (6PD-R), U.S. Environmental Protection Agency, Region 6, Dallas

Project Number: 331049

TEXAS COMMISSION ON ENVIRONMENTAL QUALITY



EXAMPLE A

NOTICE OF RECEIPT OF APPLICATION AND INTENT TO OBTAIN AIR PERMIT

PROPOSED AIR QUALITY PERMIT NUMBER 165848

APPLICATION Exflur Research Corporation, has applied to the Texas Commission on Environmental Quality (TCEQ) for:
Issuance of Permit 165848

This application would authorize construction of the Exflur Research facility located at 1100 County Road 236, Florence, Williamson County, Texas 76527. This application is being processed in an expedited manner, as allowed by the commission's rules in 30 Texas Administrative Code, Chapter 101, Subchapter J. This link to an electronic map of the site or facility's general location is provided as a public courtesy and not part of the application or notice. For exact location, refer to application. <http://www.tceq.texas.gov/assets/public/hb610/index.html?lat=30.791111&lng=-97.904166&zoom=13&type=r> The facility will emit the following contaminants: hydrogen fluorides, carbon monoxide, hazardous air pollutants, nitrogen oxides and organic compounds.

This application was submitted to the TCEQ on July 9, 2021. The application will be available for viewing and copying at the TCEQ central office, the TCEQ Austin regional office, and the Eula Hunt Beck Florence Public Library, 207 East Main Street, Florence, Williamson County, Texas beginning the first day of publication of this notice. The facility's compliance file, if any exists, is available for public review in the Austin regional office of the TCEQ.

The executive director has determined the application is administratively complete and will conduct a technical review of the application.

PUBLIC COMMENT/PUBLIC MEETING You may submit public comments, or request a public meeting or a contested case hearing to the Office of the Chief Clerk at the address below. The TCEQ will consider all public comments in developing a final decision on the application. After the deadline for public comments, the executive director will prepare a response to all public comments.

The purpose of a public meeting is to provide the opportunity to submit comments or ask questions about the application. A public meeting about the application will be held if the executive director determines that there is a significant degree of public interest in the application, if requested by an interested person, or if requested by a local legislator. A public meeting is not a contested case hearing.

After technical review of the application is complete, the executive director may prepare a draft permit and will issue a preliminary decision on the application. Notice of Application and Preliminary Decision for an Air Quality Permit will then be published and mailed to those who made comments, submitted hearing requests or are on the mailing list for this application. That notice will contain the final deadline for submitting public comments.

OPPORTUNITY FOR A CONTESTED CASE HEARING You may request a contested case hearing. A contested case hearing is a legal proceeding similar to a civil trial in state district court. A contested case hearing will only be granted based on disputed issues of fact that are relevant and material to the Commission's decision. Further, the Commission will only grant a hearing on those issues submitted during the public comment period and not withdrawn. The deadline to submit a request for a contested case hearing is 30 days after newspaper notice is published. If a request is timely filed, the deadline for requesting a contested case hearing will be extended to 30 days after the mailing of the response to comments.

A person who may be affected by emissions of air contaminants from the facility is entitled to request a hearing. If requesting a contested case hearing, you must submit the following: (1) your name (or for a group or

association, an official representative), mailing address, and daytime phone number; (2) applicant's name and permit number; (3) the statement "[I/we] request a contested case hearing"; (4) a specific description of how you would be adversely affected by the application and air emissions from the facility in a way not common to the general public; (5) the location and distance of your property relative to the facility; (6) a description of how you use the property which may be impacted by the facility; and (7) a list of all disputed issues of fact that you submit during the comment period. If the request is made by a group or an association, one or more members who have standing to request a hearing must be identified by name and physical address. The interests the group or association seeks to protect must also be identified. You may also submit your proposed adjustments to the application/permit which would satisfy your concerns.

If a hearing request is timely filed, following the close of all applicable comment and request periods, the Executive Director will forward the application and any requests for contested case hearing to the Commissioners for their consideration at a scheduled Commission meeting. The Commission may only grant a request for a contested case hearing on issues the requestor submitted in their timely comments that were not subsequently withdrawn. **If a hearing is granted, the subject of a hearing will be limited to disputed issues of fact or mixed questions of fact and law relating to relevant and material air quality concerns submitted during the comment period.** Issues such as property values, noise, traffic safety, and zoning are outside of the Commission's jurisdiction to address in this proceeding.

MAILING LIST In addition to submitting public comments, you may ask to be placed on a mailing list to receive future public notices for this specific application by sending a written request to the Office of the Chief Clerk at the address below.

AGENCY CONTACTS AND INFORMATION Public comments and requests must be submitted either electronically at www14.tceq.texas.gov/epic/eComment/, or in writing to the Texas Commission on Environmental Quality, Office of the Chief Clerk, MC-105, P.O. Box 13087, Austin, Texas 78711-3087. Please be aware that any contact information you provide, including your name, phone number, email address and physical address will become part of the agency's public record. For more information about this permit application or the permitting process, please call the Public Education Program toll free at 1-800-687-4040. Si desea información en Español, puede llamar al 1-800-687-4040.

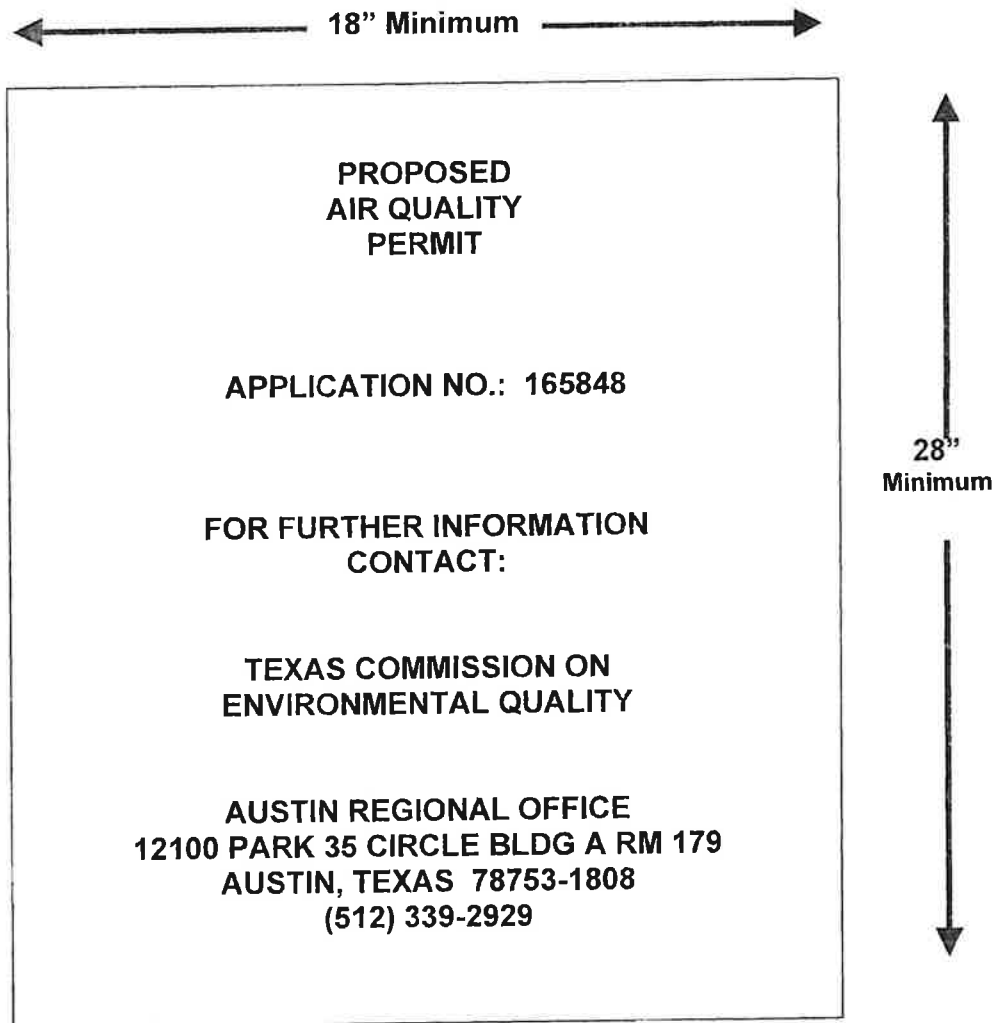
Further information may also be obtained from Exflour Research Corporation, 2350 Double Creek Drive, Round Rock, Texas 78664-3801 or by calling Dr. Thomas Bierschenk, PHD, Vice President at (512) 310-9044.

Notice Issuance Date: July 14, 2021

Example C

Sign Posting

Sign(s) must be in place on day of publication of first newspaper notice and must remain in place and the lettering must be legible during that designated comment period (30 days). It is recommended that the signs remain in place until 30 days after the last newspaper publication of the second notice (either English or alternate language notice, whichever is later). Note - The information shown is an example only. It is your responsibility to verify that the appropriate information pertaining to your application is accurate. Each sign placed at the site must be located within 10 feet of each (every) property line paralleling a public highway, street or road. Signs must be visible from the street and spaced at not more than 1,500-foot intervals. A minimum of one sign, but not more than three signs shall be required along any property line paralleling a public highway, street, or road.



Sign(s) must be placed at whatever height above the ground is necessary for sign(s) to be 100% visible from the street.

WHITE BACKGROUND WITH BLACK LETTERS

All lettering must be no less than 1-1/2 inch block printed capitals.

Public Notice Checklist
Notice of Receipt of Application and Intent to Obtain Permit
(1st Notice)

The following tasks must be completed for public notice. If publication in an alternative language is required, please complete the tasks for both the English and alternative language publications. Detailed instructions are included in the "Instructions for Public Notice" section of this package.

Within 30 calendar days after date of administrative completeness letter
<p>Publish <i>Notice of Receipt of Application and Intent to Obtain Permit</i></p> <ul style="list-style-type: none">- Example A must be published in "public notice" section of newspaper. Review for accuracy prior to publishing.- As part of the expedited permitting process, it is recommended that you publish immediately. <p>Provide copy of application at a public place for review and copying. Keep it there until end of the designated comment period.</p> <p>Prepare signs.</p>
First day of newspaper publication
<p>Review published newspaper notice for accuracy. If errors, contact Air Permits Division.</p> <p>Post signs and keep them up for duration of the designated comment period (see Example C).</p> <p>Ensure copy of application is at the public place.</p>
Within 10 business days after date of publication
<p>Proof of publication showing publication date and newspaper name should be emailed to PROOFS@tceq.texas.gov or mailed to:</p> <ul style="list-style-type: none">Texas Commission on Environmental QualityOffice of the Chief Clerk, MC-105Attn: Notice Team / AIR Expedited PermittingP.O. Box 13087Austin, Texas 78711-3087 <p>Mail or email, as instructed, photocopies of newspaper clippings showing publication date and newspaper name to persons listed on <i>Notification List</i></p>
Within 30 calendar days after date of publication
<p>Affidavit of publication for air permitting and alternative language affidavit of publication for air permitting (if applicable) should be emailed to PROOFS@tceq.texas.gov or mailed to:</p> <ul style="list-style-type: none">Texas Commission on Environmental QualityOffice of the Chief Clerk, MC-105Attn: Notice Team / AIR Expedited PermittingP.O. Box 13087Austin, Texas 78711-3087 <p>Mail or email, as instructed, photocopies of affidavits to persons listed on <i>Notification List</i></p>
Within 10 business days after end of the designated comment period
<p>Public Notice Verification Form should be emailed to PROOFS@tceq.texas.gov or mailed to:</p> <ul style="list-style-type: none">Texas Commission on Environmental QualityOffice of the Chief Clerk, MC-105Attn: Notice Team / AIR Expedited PermittingP.O. Box 13087Austin, Texas 78711-3087 <p>Mail or email, as instructed, photocopies of Public Notice Verification Form to persons listed on <i>Notification List</i></p>

TEXAS COMMISSION ON ENVIRONMENTAL QUALITY



Instructions for Public Notice For New Source Review Small Business Stationary Source Air Permit

Notice of Receipt of Application and Intent to Obtain Permit

Your application has been declared administratively complete and now you must comply with the following instructions:

Review Notice

Included in the notice is all of the information which the commission believes is necessary to effectuate compliance with applicable public notice requirements. Please read it carefully and notify the Texas Commission on Environmental Quality (TCEQ) immediately if it contains any errors or omissions. You are responsible for ensuring the accuracy of all information published. You may not change the text of the notice without prior approval from the TCEQ.

Newspaper Notice

- You must publish the enclosed *Notice of Receipt of Application and Intent to Obtain Permit* within **30 calendar days** after the date of administrative completeness. As part of the expedited permitting process, it is recommended that you publish immediately. Refer to the cover letter for the date of administrative completeness.
- You must publish the enclosed *Notice of Receipt of Application and Intent to Obtain Permit* at your expense, in a newspaper that is of general circulation in the municipality where the facility is or will be located. If the facility is not located within a municipality, the newspaper should be of general circulation in the municipality nearest to the location or proposed location.
- You must publish this notice in one issue of any applicable newspaper.
- You will find two example notices enclosed in this package. *Example A* must be published in the "public notice" section of the newspaper. The phrase "Example A" is not required to be published
- The bold text of the enclosed notice **must** be printed in the newspaper in a font style or size that distinguishes it from the rest of the notice (i.e., **bold, italics**). **Failure to do so may require re-notice.**

Alternative Language Notice

In certain circumstances, applicants for air permits must complete notice in alternative languages.

- Public notice rules require the applicant to determine whether a bilingual program is required at either the elementary or middle school nearest to the facility or proposed facility location. Bilingual education programs are determined on a district-wide basis. When students who are required to attend either school are eligible to be enrolled in a bilingual education program, some alternative language notice is required (signs, or signs and newspaper notice).

- Since the school district, and not the schools, must provide the bilingual education program, these programs do not have to be located at the elementary or middle school nearest to the facility or proposed facility to trigger the alternative language notice requirement. If there are students who would normally attend the nearest schools eligible to be taught in a bilingual education program at a different location, alternative language notice is required.
- If triggered, publication of alternative language notices must be made in a newspaper or publication primarily printed in each language taught in the bilingual education program. This notice is required if such a newspaper or publication exists in the municipality or the county where the facility is or will be located.
- The applicant must demonstrate a good faith effort to identify a newspaper or publication in the required language. If a newspaper or publication of general circulation published at least once a month in such language cannot be found, publishing in that language is not required, but signs must still be posted adjacent to each English language sign.
- Publication in an alternative language section or insertion within an English language newspaper does not satisfy these requirements.
- The applicant has the burden to demonstrate compliance with these requirements. You must fill out the ***Public Notice Verification Form (Form TCEQ-20244)*** indicating your compliance with the requirements regarding publication in an alternative language. **This form is available at www.tceq.texas.gov/permitting/air/nav/air_publicnotice.html.**
- It is suggested the applicant work with the local school district to do the following:
 - (a) determine if a bilingual program is required in the district;
 - (b) determine which language is required by the bilingual program;
 - (c) locate the nearest elementary and middle schools; and
 - (d) determine if any students attending either school are eligible to be enrolled in a bilingual educational program.
- **If you determine that you must meet the alternative language notice requirements, you are responsible for ensuring that the publication in the alternative language is complete and accurate in that language. Spanish notice templates are available through the Air Permits Division Web site at www.tceq.texas.gov/permitting/air/nav/air_publicnotice.html. All italic notes should be replaced with the corresponding Spanish translations for the specific application and published in the alternative language publication.**
- If you are required to publish notice in a language other than Spanish, you must translate the entire public notice at your own expense.

Public Comment Period

- The public comment period should last at least **30 calendar days**.
- The comment period will be longer if the last day of the public comment period ends on a weekend or a holiday. In this case, the comment period will end on the next business day.
- The comment period for the permit may lengthen depending on whether a public meeting is held. If a public meeting is held, the comment period will be extended to the later of either the date of the public meeting or the end of the second notice period.

Proof of Publication

- Check each publication to ensure that the articles were accurately published. If a notice was not published correctly you may be required to republish.
- For each newspaper in which you published, you must submit proof of publication that shows the notice, the date of publication, and the name of the newspaper to the Office of the Chief Clerk within **10 business days** after the date of publication. Acceptable proofs of publication are 1) copies of the published notice or 2) the newspaper clippings of the published notice. If you choose to submit copies of the published notice to the Office of the Chief Clerk, copies must be on standard-size 8½" x 11" paper and must show the actual size of the published notice (do not reduce the image when making copies). Published notices longer than 11" must be copied onto multiple 8½" x 11" pages. Please note, submitting a copy of your published notice could result in faster processing of your application. It is recommended that you maintain newspaper clippings or tear sheets of the notice for your records.
- You must submit an **affidavit of publication for air permitting and alternate language affidavit of publication for air permitting (if applicable)** to the Office of the Chief Clerk within **30 calendar days** after the date of publication. **You must use the enclosed affidavit forms.** The affidavits must clearly identify the applicant's name and permit number. You are encouraged to submit the affidavit with the proof of publication described above.
- You must submit the **Public Notice Verification Form (Form TCEQ-20244)** to the Office of the Chief Clerk within **10 business days** of the end of this public comment period. You must use this form to certify that you have met bilingual notice requirements. **This form is available at www.tceq.texas.gov/permitting/air/nav/air_publicnotice.html.**
- The **affidavits of publication, Public Notice Verification Form, and acceptable proof of publication of the published notices** should be emailed to PROOFS@tceq.texas.gov or mailed to:

Texas Commission on Environmental Quality
Office of the Chief Clerk, MC-105
Attn: Notice Team / AIR Expedited Permitting
P.O. Box 13087
Austin, Texas 78711-3087

- Please ensure that the affidavit(s) you send to the Chief Clerk have all blanks on the affidavit filled in correctly.
- Photocopies of newspaper clippings, affidavits, and verifications must also be sent to those listed on the enclosed *Notification List* within the deadlines specified above.

Failure to Publish and Submit Proof of Publication

You must meet all publication requirements. **If you fail to publish the notice or submit proof of publication on time, then** the TCEQ may suspend further processing on your application or take other actions.

Sign Posting

Applicants for air quality permits must also post signs.

- You must post at least one sign in English and as applicable, in each alternative language.

- Signs must be in place on the first day of publication in a newspaper and must remain in place and be legible and be visible from the street for the entire duration of the publications' designated comment period (see Example C).
- The sign template enclosed (*Example C*) is an example only. Read the sign template carefully and notify the TCEQ if it has an error or omissions. It is your responsibility to verify that the appropriate information pertaining to your application is accurate. Any changes to the text prepared by the TCEQ must be approved by the agency.
- Signs placed at the site must be located within 10 feet of each (every) property line paralleling a public street, road, or highway. Signs must be spaced at not more than 1,500-foot intervals. A minimum of one sign, but not more than three signs are required along any property line paralleling a public street, road, or highway. Sign(s) must be placed at a sufficient height above the ground that is necessary for sign(s) to be 100 percent visible from the street.
- All lettering on the sign must be no less than 1½" in height with block printed capital lettering. The sign must be at least 18" wide and 28" tall, and consist of black lettering on a white background.
- Alternative language signs are required if alternative notice is required, even if no newspaper can be found.
- Inspect each posted sign daily to ensure it is present and visible throughout the entire comment period.
- You must submit verification of sign posting using the **Public Notice Verification Form (Form TCEQ-20244)** within **10 business days** after end of the publications' designated comment period. Do not submit the *Public Notice Verification Form* verifying sign posting until after the comment period is over. You cannot certify that the sign posting is in compliance until after the comment period is over. **This form is available at www.tceq.texas.gov/permitting/air/nav/air_publicnotice.html.**

Application in a Public Place

- You must provide a copy of the administratively complete application at a public place for review and copying by the public. This place must be in the county in which the facility is located or proposed to be located.
- A public place is one that is publicly owned or operated. For example, libraries, county courthouses, or city halls.
- The administratively complete application must be available beginning on the first day of newspaper publication and remain available during the entire public comment period.
- If the application is submitted to the TCEQ with information marked as confidential, you are required to indicate which specific portions of the application are not being made available to the public. These portions of the application must be accompanied with the following statement: "Any request for portions of this application that are marked as confidential must be submitted in writing, pursuant to the Public Information Act, to the Texas Commission on Environmental Quality, Public Information Coordinator, MC-197, P.O. Box 13087, Austin, Texas 78711-3087."
- You must submit verification of file availability using the **Public Notice Verification Form (Form TCEQ-20244)** within **10 business days** after end of the publications' designated comment period. Do not submit the form verifying that the application was in a public place until after the comment period is complete. If a public meeting is held or second notice is required causing the public comment period to be extended, at a later date you will be required to verify that the

application was in a public place during the entire public comment period. **This form is available at www.tceq.texas.gov/permitting/air/nav/air_publicnotice.html.**

General Information

When contacting the Commission regarding this application, please refer to the permit number at the top of the *Notice of Application and Intent to Obtain Permit*.

If you wish to obtain an electronic copy, please contact the initial reviewer who assisted in the preparation of this public notice package. The electronic version is available in Microsoft Word format only and can be requested once your application has been declared administratively complete. Please ensure that the electronic version is correct and consistent with the hard copies that were provided. Any revisions made may not be accepted. **You may download copies of the Public Notice Verification Form and Affidavits of publication by visiting our agency Web site at www.tceq.texas.gov/permitting/air/nav/air_publicnotice.html.**

If you have questions or need assistance regarding publication requirements, please contact the Office of the Chief Clerk at (512) 239-3300 or the administrative reviewer listed in the cover letter.

TCEQ-Office of the Chief Clerk
MC-105 Attn: Notice Team
P.O. Box 13087
Austin, Texas 78711-3087

Applicant Name: Exflour Research Corporation
Permit No.: 165848
Application Received Date: July 9, 2021

AFFIDAVIT OF PUBLICATION FOR AIR PERMITTING

STATE OF TEXAS §
COUNTY OF _____ §

BEFORE ME, the undersigned authority, on this day personally appeared

_____, who being by me duly sworn, deposes and says that (s)he is *(Name of Person Representing Newspaper)*

the _____ of the _____
(Title of Person Representing Newspaper) *(Name of the Newspaper)*

that said newspaper is generally circulated in _____, Texas;
(The municipality or nearest municipality to the location of the facility or the proposed facility)

that the enclosed notice was published in said newspaper on the following date(s):

(Newspaper Representative's Signature)

Subscribed and sworn to before me this the _____ day of _____, 20____
to certify which witness my hand and seal of office.

[Affix Seal]

Notary Public in and for the State of Texas

Print or Type Name of Notary Public

My Commission Expires

TCEQ-Office of the Chief Clerk
MC-105 Attn: Notice Team
P.O. Box 13087
Austin, Texas 78711-3087

Applicant Name: Exflor Research Corporation
Permit No.: 165848
Application Received Date: July 9, 2021

ALTERNATIVE LANGUAGE AFFIDAVIT OF PUBLICATION FOR AIR PERMITTING

STATE OF TEXAS §

COUNTY OF _____ §

BEFORE ME, the undersigned authority, on this day personally appeared

_____, who being by me duly sworn, deposes and says that (s)he is *(Name of Person Representing Newspaper)*

the _____ of the _____;
(Title of Person Representing Newspaper) *(Name of the Newspaper)*

that said newspaper is generally circulated in _____, Texas;
(The municipality or county in which the facility or proposed facility is located)

that the enclosed notice was published in said newspaper on the following date(s):

(Newspaper Representative's Signature)

Subscribe and sworn to before me this the _____ day of _____, 20____
to certify which witness my hand and seal of office.

Notary Public in and for the State of Texas

[Affix Seal]

Print or Type Name of Notary Public

My Commission Expires

Notification List

It is the responsibility of the applicant to furnish the following offices with copies of the notices published, the *Affidavit of Publication for Air Permitting*, the *Alternative Language Affidavit of Publication for Air Permitting (if applicable)*, and a completed copy of the *Public Notice Verification Form (Form TCEQ-20244)*. Acceptable proof of publication and any affidavits and Form TCEQ-20244 should be emailed to PROOFS@tceq.texas.gov or mailed to the Texas Commission on Environmental Quality, Office of the Chief Clerk, MC-105, AIR Expedited Permitting, P.O. Box 13087, Austin, Texas 78711-3087.

Electronic copies should be submitted via email to the U.S. Environmental Protection Agency (EPA), **Region 6** at R6AirPermitsTX@EPA.gov. Please contact Ms. Aimee Wilson (wilson.aimee@epa.gov) at (214) 665-7596 if you have any questions pertaining to electronic submittals to the EPA.

Email copies to Mr. Joel Stanford at Joel.Stanford@tceq.texas.gov

Hard copies should be sent to the following:

Texas Commission on Environmental Quality
Air Section Manager
Austin Regional Office
12100 Park 35 Circle Bldg A Rm 179
Austin, Texas 78753-1808

For TCEQ Use Only

Permit Application Routing and Summary Sheet
Air Permits

This sheet should accompany all notices to be processed by the office of the chief clerk on the left side of the file folder.

Name of applicant: Exflur Research Corporation	
Facility/ Site name: Exflur Research	
TCEQ permit number: 165848	
Application received date: July 9, 2021	
Customer reference number: CN602696791	
Regulated entity number: RN110969227	
County: Williamson	Region: 11
Local program 1:	Local program 2:
Permit type: Permit Application	
Internal program routing	
Tech. team leader: Mr. Joel Stanford	Phone no. (512) 239-0270
APIRT team leader: Johnny Bowers	Date: July 14, 2021
Administratively reviewed by: Steve Piper	Phone no. (512) 239-1589
Administratively complete date:	July 14, 2021
Public viewing location must have internet access: <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
Is 2nd public notice required: <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
*709 applies	

For TCEQ Use Only

Applicant and Contact Information

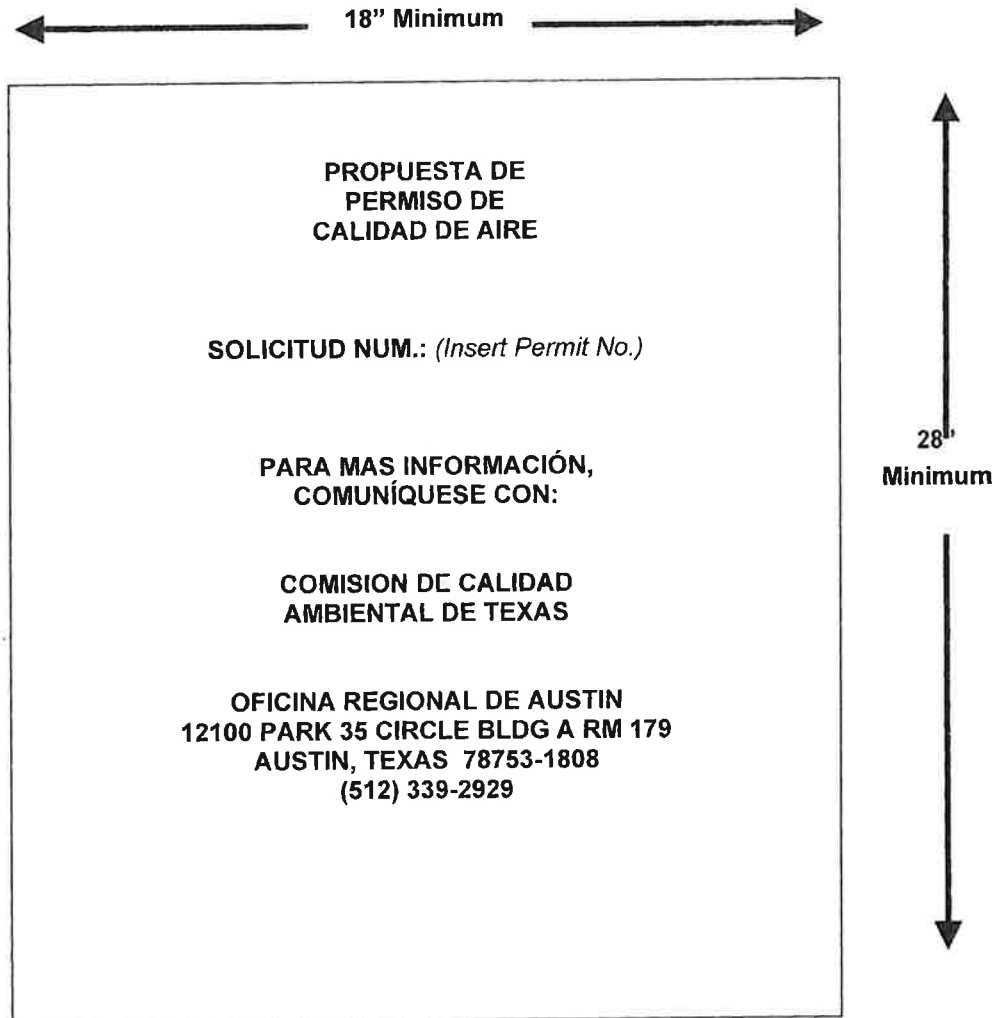
This sheet should accompany all notices to be processed by the office of the chief clerk on the right side of the file folder.

Applicant's main contact and address to be shown on permit:	
Name/Title: Thomas Bierschenk PHD, Vice President	
Company: Exflur Research Corporation	
Street/Road: 2350 Double Creek Dr	
City/State/Zip: Round Rock, TX 78664-3801	
Telephone: (512) 310-9044	Fax: (512) 310-9045
Applicant's technical representative/ consultant:	
Name/Title: Luke Bernhard, EHS Manager	
Company: Exflur Research Corporation	
Street/Road: 2350 Double Creek Dr	
City/State/Zip: Round Rock, TX 78664-3801	
Phone: (512) 310-9044	Fax: (512) 310-9045
Person responsible for publishing notice:	
Name/Title: Thomas Bierschenk PHD, Vice President	
Company: Exflur Research Corporation	
Street/Road: 2350 Double Creek Dr	
City/State/Zip: Round Rock, TX 78664-3801	
Telephone: (512) 310-9044	Fax: (512) 310-9045

EXAMPLE F

SIGN POSTING

Sign(s) must be in place on day of publication of first newspaper notice and must remain in place and be legible during that designated comment period (30 days). These signs must remain in place until 30 days after the last newspaper publication of the second notice (either English or alternate language notice, whichever is later). Note - The information shown is an example only. It is your responsibility to verify that the appropriate information pertaining to your application is accurate. Each sign placed at the site must be located within 10 feet of each (every) property line paralleling a public highway, street or road. Signs must be visible from the street and spaced at not more than 1,500-foot intervals. A minimum of one sign, but not more than three signs shall be required along any property line paralleling a public highway, street, or road.



Sign(s) must be placed at whatever height above the ground is necessary for sign(s) to be 100% visible from the street.

WHITE BACKGROUND WITH BLACK LETTERS

All lettering must be no less than 1-1/2 inch block printed capitals.

Application Exhibit 4

Legislative Letter

Senate Bill 709 (84th Texas Legislative Session, 2015) amended the Texas Water Code by adding new Section 5.5553, which requires the Texas Commission on Environmental Quality (TCEQ) to provide written notice to you at least thirty (30) days prior to the TCEQ's issuance of draft permits for applications that are located in your district.

Exfluor Research Corporation has applied to the TCEQ for air quality permitting actions regarding a Exfluor Research.

Application Received Date: July 9, 2021

Location: 1100 County Road 236, Florence, Williamson County, Texas, 76527

This link to an electronic map of the site or facility's general location is provided as a public courtesy and not part of the application or notice:

<http://www.tceq.texas.gov/assets/public/hb610/index.html?lat=30.791111&lng=-97.904166&zoom=13&type=r>.

Air Quality Permits affected:

- *Air Quality Permit 165848*

TCEQ is preparing the initial draft permit for applicant review. At the time the draft permit is issued, the applicant will be required to publish notice in a newspaper of general circulation, and the TCEQ will provide a copy of the notice of draft permit to persons who have requested to be on a mailing list.

Questions regarding this email may be directed to Bonnie Evridge by calling 512-239-5222.

Issued: July 14, 2021

Application Exhibit 5

TCEQ Chief Clerk's NORI Mailing List

TEXAS COMMISSION ON ENVIRONMENTAL QUALITY



EXAMPLE A

NOTICE OF RECEIPT OF APPLICATION AND INTENT TO OBTAIN AIR PERMIT

PROPOSED AIR QUALITY PERMIT NUMBER 165848

APPLICATION Exflur Research Corporation, has applied to the Texas Commission on Environmental Quality (TCEQ) for:
Issuance of Permit 165848

This application would authorize construction of the Exflur Research facility located at 1100 County Road 236, Florence, Williamson County, Texas 76527. This application is being processed in an expedited manner, as allowed by the commission's rules in 30 Texas Administrative Code, Chapter 101, Subchapter J. This link to an electronic map of the site or facility's general location is provided as a public courtesy and not part of the application or notice. For exact location, refer to application.
http://www.tceq.texas.gov/assets/public/hb610/index.html?lat=30.791111&lng=-97.904166&zoom=13&type=r_ The facility will emit the following contaminants: hydrogen fluorides, carbon monoxide, hazardous air pollutants, nitrogen oxides and organic compounds.

This application was submitted to the TCEQ on July 9, 2021. The application will be available for viewing and copying at the TCEQ central office, the TCEQ Austin regional office, and the Eula Hunt Beck Florence Public Library, 207 East Main Street, Florence, Williamson County, Texas beginning the first day of publication of this notice. The facility's compliance file, if any exists, is available for public review in the Austin regional office of the TCEQ.

The executive director has determined the application is administratively complete and will conduct a technical review of the application.

PUBLIC COMMENT/PUBLIC MEETING You may submit public comments, or request a public meeting or a contested case hearing to the Office of the Chief Clerk at the address below. The TCEQ will consider all public comments in developing a final decision on the application. After the deadline for public comments, the executive director will prepare a response to all public comments.

The purpose of a public meeting is to provide the opportunity to submit comments or ask questions about the application. A public meeting about the application will be held if the executive director determines that there is a significant degree of public interest in the application, if requested by an interested person, or if requested by a local legislator. A public meeting is not a contested case hearing.

After technical review of the application is complete, the executive director may prepare a draft permit and will issue a preliminary decision on the application. Notice of Application and Preliminary Decision for an Air Quality Permit will then be published and mailed to those who made comments, submitted hearing requests or are on the mailing list for this application. That notice will contain the final deadline for submitting public comments.

OPPORTUNITY FOR A CONTESTED CASE HEARING You may request a contested case hearing. A contested case hearing is a legal proceeding similar to a civil trial in state district court. A contested case hearing will only be granted based on disputed issues of fact that are relevant and material to the Commission's decision. Further, the Commission will only grant a hearing on those issues submitted during the public comment period and not withdrawn. **The deadline to submit a request for a contested case hearing is 30 days after newspaper notice is published. If a request is timely filed, the deadline for requesting a contested case hearing will be extended to 30 days after the mailing of the response to comments.**

A person who may be affected by emissions of air contaminants from the facility is entitled to request a hearing. If requesting a contested case hearing, you must submit the following: (1) your name (or for a group or association, an official representative), mailing address, and daytime phone number; (2) applicant's name and permit number; (3) the statement "[I/we] request a contested case hearing"; (4) a specific description of how you would be adversely affected by the application and air emissions from the facility in a way not common to the general public; (5) the location and distance of your property relative to the facility; (6) a description of how you use the property which may be impacted by the facility; and (7) a list of all disputed issues of fact that you submit during the comment period. If the request is made by a group or an association, one or more members who have standing to request a hearing must be identified by name and physical address. The interests the group or association seeks to protect must also be identified. You may also submit your proposed adjustments to the application/permit which would satisfy your concerns.

If a hearing request is timely filed, following the close of all applicable comment and request periods, the Executive Director will forward the application and any requests for contested case hearing to the Commissioners for their consideration at a scheduled Commission meeting. The Commission may only grant a request for a contested case hearing on issues the requestor submitted in their timely comments that were not subsequently withdrawn. **If a hearing is granted, the subject of a hearing will be limited to disputed issues of fact or mixed questions of fact and law relating to relevant and material air quality concerns submitted during the comment period.** Issues such as property values, noise, traffic safety, and zoning are outside of the Commission's jurisdiction to address in this proceeding.

MAILING LIST In addition to submitting public comments, you may ask to be placed on a mailing list to receive future public notices for this specific application by sending a written request to the Office of the Chief Clerk at the address below.

AGENCY CONTACTS AND INFORMATION Public comments and requests must be submitted either electronically at www14.tceq.texas.gov/epic/eComment/, or in writing to the Texas Commission on Environmental Quality, Office of the Chief Clerk, MC-105, P.O. Box 13087, Austin, Texas 78711-3087. Please be aware that any contact information you provide, including your name, phone number, email address and physical address will become part of the agency's public record. For more information about this permit application or the permitting process, please call the Public Education Program toll free at 1-800-687-4040. Si desea información en Español, puede llamar al 1-800-687-4040.

Further information may also be obtained from Exflour Research Corporation, 2350 Double Creek Drive, Round Rock, Texas 78664-3801 or by calling Dr. Thomas Bierschenk, PHD, Vice President at (512) 310-9044.

Notice Issuance Date: July 14, 2021

THE HONORABLE CHARLES
SCHWERTNER
TEXAS SENATE
DISTRICT ROOM 3E.10
TEXAS STATE CAPITOL
Charles.schwertner@senate.texas.gov

THE HONORABLE JOHN BUCY
TEXAS HOUSE OF REPRESENTATIVES
DISTRICT ROOM E2.602
TEXAS STATE CAPITOL
john.bucy@house.texas.gov

THE HONORABLE JAMES TALARICO
TEXAS HOUSE OF REPRESENTATIVES
DISTRICT ROOM E2.418
TEXAS STATE CAPITOL
james.talarico@house.texas.gov

THE HONORABLE TERRY WILSON
TEXAS HOUSE OF REPRESENTATIVES
DISTRICT ROOM E2.714
TEXAS STATE CAPITOL
Terry.wilson@house.texas.gov

145848

STATE

07/15/2021
APP-00210

CAPITAL AREA COUNCIL OF GOVERN
6800 BURLESON RD STE 165
AUSTIN TX 78744-2325

CITY OF AUSTIN WATERSHED DEPT
TPDES PERMIT
PO BOX 1088
AUSTIN TX 78767-1088

PUBLIC HEALTH REGION 7
TEXAS DEPARTMENT OF STATE HEAL
2408 S 37TH ST
TEMPLE TX 76504-7168

US ARMY CORPS OF ENGINEERS REG
CESWS-PER-R
PO BOX 17300
FORT WORTH TX 76102-0300

FIELD SUPERVISOR
US FISH & WILDLIFE SERVICE
10711 BURNET RD STE 200
AUSTIN TX 78758-4460

WILLIAMSON COUNTY & CITIES HEA
355 TEXAS AVE
ROUND ROCK TX 78664-2565

WILLIAMSON COUNTY JUDGE
710 S MAIN ST STE 101
GEORGETOWN TX 78626-5701

JIM BRIGGS
CITY OF GEORGETOWN UTILITY SYS
PO BOX 409
GEORGETOWN TX 78627-0409

MR MICHAEL THANE DIR OF UTI
CITY OF ROUND ROCK
2008 ENTERPRISE DR
ROUND ROCK TX 78664-2120

MR MICHAEL THANE DIR OF UTI
CITY OF ROUND ROCK
2008 ENTERPRISE DR
ROUND ROCK TX 78664

LAURALEE VALLON GENERAL CO
BRAZOS RIVER AUTHORITY
4600 COBBS DR
PO BOX 7555
WACO TX 76714-7555

COUNTY

RACHEL AUSTIN
CITY OF JONESTOWN
PO BOX 5023
JONESTOWN TX 78645-0002

SUZY BATES
16219 W STATE HIGHWAY 29
LIBERTY HILL TX 78642-3803

SHARON H CASSADY
1541 ORCHARD DR
LEANDER TX 78641-1370

JAMES R CLARNO
108 TRINITY LN
GEORGETOWN TX 78633-4118

CONCERNED CITIZEN
CITY OF AUSTIN - AUSTIN WATER UTILITY
ATTN DIRECTOR
PO BOX 1088
AUSTIN TX 78767-1088

NOELKE COTTON
LAW DEPARTMENT CITY OF AUSTIN
PO BOX 1088
AUSTIN TX 78767-1088

BETTY & CHESTER CRITCHFIELD
PECAN SPRINGS RANCH
801 COUNTY ROAD 344
JARRELL TX 76537-1194

DAVID O FREDERICK
FREDERICK PERALES ALLMON & ROCKWE
1206 SAN ANTONIO ST
AUSTIN TX 78701-1834

JUDY GRACI
15775 BOOTH CIR
VOLENTE TX 78641-9684

LORAIN HOANE
4920 N INTERSTATE 35
AUSTIN TX 78751-2716

M D HOSSAIN
CITY OF KILLEEN
PUBLIC WORKS/ENGINEERING
200 E AVENUE D
KILLEEN TX 76541-5228

MONICA JACOBS
KELLY HART & HALLMAN LLP
STE 2000
303 COLORADO ST
AUSTIN TX 78701-4653

IP/PROT

11a584A

07/15/2021

APP-00211

MR & MRS GARY JOHNSON
1011 RED CLIFF DR
AUSTIN TX 78758-5133

CORY R JUBY
826 LINGER LN
AUSTIN TX 78721-3650

CHUCK & DALE L MARTIN
APT 152
10600 JOLLYVILLE RD
AUSTIN TX 78759-6276

CHUCK & DALE L MARTIN
187 ESTRELLA XING
GEORGETOWN TX 78628-6973

KEN MARTIN PE
MARTIN PRATER & ASSOCIATES
2109 CRAIG PATRICK WAY
AUSTIN TX 78748-3537

LYLE A MCELDERRY
406 WYNDHAM HILL PKWY
TEMPLE TX 76502-1974

SUSAN MECKEL
LOWER COLORADO RIVER AUTHORITY
L106
PO BOX 220
AUSTIN TX 78767-0220

ANDREW MILLER
STE 370-134
6001 W PARMER LN
AUSTIN TX 78727-3901

ANDREW S MILLER
KEMP SMITH LLP
STE 1305
919 CONGRESS AVE
AUSTIN TX 78701-2102

ROSANA NAREZ
PO BOX 93331
SOUTHLAKE TX 76092-0113

ROSANA NAREZ
TEX-MEX NEWS
PO BOX 8665
WACO TX 76714-8665

MARK NUNEZ
CITY OF HUTTO
356 COUNTY ROAD 199
HUTTO TX 78634-4271

HELEN RAMIREZ
401 W FRONT ST
HUTTO TX 78634-4203

MS MARILYN SAMUELSON
14914 SVENSKA RD
COUPLAND TX 78615-4874

KENNETH & RITA SCHOEN
1437 SLAWSON LN
KILLEEN TX 76542-4271

STEVEN SMELTZER
ALAMO AREA COUNCIL OF GOVERNMENTS
8700 TESORO DR STE 160
SAN ANTONIO TX 78217-8221

MR S SORENSON
BRUSH BEND PROPERTY OWNERS ASSOC
901 BRUSHY BEND DR
ROUND ROCK TX 78681-1401

MICHAEL D THANE
3400 SUNRISE RD
ROUND ROCK TX 78665-2398

ALLISON THRASH
15100 FM 2769
VOLENTE TX 78641-9139

GWENDOLYN HILL WEBB
PO BOX 368
HOUSTON TX 77001-0368

GWENDOLYN HILL WEBB
4TH FL
900 BAGBY ST
HOUSTON TX 77002-2527

NANCY WEBBER
4128 LAWLESS ST
AUSTIN TX 78723-5393

GREGORY J WHITE IND PRETREAT
CEDAR PARK PUBLIC WORKS DEPT
2315 BRUSHY CREEK LOOP
CEDAR PARK TX 78613-3162

IP/PROT

110.5948

07/15/2021

APP-00212

Application Exhibit 6

NORI Proof of Publication

(Affidavits/Tearsheets for English and Bilingual)

TCEQ-Office of the Chief Clerk
MC-105 Attn: Notice Team
P.O. Box 13087
Austin, Texas 78711-3087

Applicant Name: Exfluo: Research Corporation
Permit No.: 165848
Application Received Date: July 9, 2021

AFFIDAVIT OF PUBLICATION FOR AIR PERMITTING

TEXAS
COMMISSION
ON ENVIRONMENTAL
QUALITY
2021 AUG -9 AM 10:19
CHIEF CLERKS OFFICE

STATE OF TEXAS §
COUNTY OF Williamson §

BEFORE ME, the undersigned authority, on this day personally appeared

Ellen Greeney, who being by me duly sworn, deposes and says that (s)he is (Name of Person Representing Newspaper)

the Archivist of the Williamson County Sun
(Title of Person Representing Newspaper) (Name of the Newspaper)

that said newspaper is generally circulated in Florence, Texas;
(The municipality or nearest municipality to the location of the facility or the proposed facility)

that the enclosed notice was published in said newspaper on the following date(s):

July 28, 2021
Ellen Greeney
(Newspaper Representative's Signature)

Subscribed and sworn to before me this the 4th day of August, 2021
to certify which witness my hand and seal of office.

[Affix Seal]



Dawn Steele
Notary Public in and for the State of Texas

Dawn Steele
Print or Type Name of Notary Public

8-26-2024
My Commission Expires

Prohibition-era sheriff sniffs out supply

July 29, 1921

Electric Current Will Be Off Sunday - In order to make changes in connections from the Switch-board to main line, made necessary by reason of the house, the current will be off most of Sunday, July 31st. Georgetown Light & Power Plant

Yesteryears

BARBARA VELVERTON

are convinced that even a President would gather in the function on such an occasion.

At The Monarch - Monday August 1 - William Farman in a Seven Part Special "Riders of The Purple Sage" by Zane Grey

President Harding gathered wood to cook the first meal at a camp near Peatonville, Md. Saturday

John Smith" in the party who issued a "no work" special edict. We've heard that edict ourselves and

watch confessed murderer M. hanged on July 30, 1923. M. mounted the scaffold at exactly 11 a.m. Two minutes later, his body had

dropped seven feet through the trap door. It hung there for 20 minutes before it was cut down and placed in a pine box for burial.

Two weeks later, Texas passed a law requiring death in the electric chair for those convicted of capital murder. The first to die by this method was executed at Huntsville State Prison on February 8, 1924.

Postmaster General William F. Bolger warned each of the 554,000 U.S. Post Department employees across the nation they could be fired if they participated in a nation-wide postal workers strike. In letters delivered to postal employees Tuesday, Bolger warned that strikers would be committing a felony and could

forfeit paid health and life insurance coverage.

Editorial: We are glad to see the threat of a nationwide postal worker strike eased. Those things do a lot more harm than good. Our local postmaster assured this newspaper that no matter how the vote went (in postal negotiations), his crew would deliver first class mail.

Second class mail, which would include the SUN, might not fare so well, so we were getting ready to set up some type of distribution scheme to get as many newspapers to our subscribers as possible without the help of the postoffice.

Thank goodness, the crisis appears over and we can relax for a while.

Editorial: I have not been just surprised, but amazed at the new spray-on lawn now being featured here by

Dennis Chapman, Jr. I saw the stuff being sprayed on piles of dirt at Southwestern several months ago and thought it was green paint. A couple of weeks later it was grass growing merrily. Serenada Racquet Club used the service and in just a few days had growing grass. I understand that quite a few astonished home-owners are now watching their lawns flourish just short weeks after the application.

Marshall and Matthew Edison play in the overflow as a pipe gushes hundreds of gallons of water from a tank on Janis Drive.

Plans for a dog park stalled by city

In a city-county trade, city gets public parking and county gets room to expand downtown government

complex, a \$5 million trade GISD serves 8,800 on 14 campuses.

July 24 & 28, 2013

GISD Supt. Joe Dan Lee was presented an American flag that flew over Camp Phoenix in Kabul, Afghanistan by Army 1st Class Giovanni Bennett. Lee plans to fly the flag at East View and Georgetown high schools before putting it on display.

Morton case bills total almost \$500,000

From Warrior to Pirate - Sgt. Brian Sunderman, a combat medic in the U. S. Army Reserves, recently made it to the national level in the military branch's Best Warrior Competition. [by] He plans to run track at Southwestern in the spring.

Public notice

facilities, and other related improvements; and those services to be provided by the District (the "Services") shall consist of those necessary for the administration and operation of the District, including those of the City and the annual collection of assessments. The District boundary consists of approximately 391.83 acres of the Georgetown Village neighborhood, generally located along Shell Road within Shell Ranch Sections 1, 2A, 2B, 2C and 3, Georgetown Village Sections 3B, 4, 4B, 5, 6, 7, 8 and 9, and Creekside at Georgetown Village subdivisions. Written or oral objections will be considered at the hearing. Persons wishing to speak for or against the assessment of the District may do so

a contested case hearing"; (4) a specific description of how you would be adversely affected by the application and air emissions from the facility in a way not common to the general public; (5) the location and distance of your property relative to the facility; (6) a description of how you use the property which may be impacted by the facility; and (7) a list of all disputed issues of fact that you submit during the comment period. If the request is made by a group or an association, one or more members who have standing to request a hearing must be identified by name and physical address. The interests the group or association seeks

shares and interest in such estate. Said application may be heard at 10:00 o'clock a.m. on or after the first Monday next after the expiration of ten days from the date of publication of this citation, at the Williamson County Justice Center in Georgetown, Williamson County, Texas.

All persons interested in said estate are hereby cited to appear before said Honorable Court on or before above mentioned time and place by filing a written answer contesting such application should they desire to do so. If this citation is not served within 90 days after the date of its issuance, it shall be returned unopened.

NOTICE TO ALL PERSONS HAVING CLAIMS AGAINST THE ESTATE OF ANTHONY J. SARAGUSA, SR., DECEASED NO. 21-077-C-24

NOTICE OF APPOINTMENT OF INDEPENDENT EXECUTOR

Notice is hereby given that on July 20, 2021, Letters Testamentary upon the above estate were issued to JOHN B. SARAGUSA, II by County Court at Law No. 4 of Williamson

for the bid list, go to <https://gwtwix.com/wave.net/CurrentSourcingEvents.aspx>

TEXAS
COMMISSION
ON ENVIRONMENTAL
QUALITY

2021 AUG -9 AM 10:19

CHIEF CLERKS OFFICE

Leander ISD is currently receiving responses for the following solicitation:
RFP #22003M22-Surplus Apple Computer: Sale, Recycling, or Disposal with Secure Data Destruction - Closes August 2, 2021 at 2:00 p.m.
The documents related to the above solicitations can be viewed at <https://leanderisd.tnfrhubb.comportal/7tab=USD>. Electronic bids will be opened via the USD Bidding program. Requests for additional information can be directed to lpurchasing@leanderisd.org or 512-570-0611.

CITATION BY PUBLICATION THE STATE OF TEXAS, COUNTY OF WILLIAMSON

Style of Case: The Homeowners' Association for Chandler Creek, Inc. vs. Leticia Osuna And Estate of Luis Osuna, Deceased; and any Unknown Party who may Claim as Heir, Devisee, Grantee, Assignee, Lienor, Creditor, Trustee, Or Other Claimant. By Through, Or Against Luis Osuna, Deceased; and any Unknown Party who may Claim as Heir, Devisee, Grantee, Assignee, Lienor, Creditor, Trustee, or other claimants, by or against Luis Osuna
NOTICE TO DEFENDANT- GREETING:
YOU HAVE BEEN SUED. YOU MAY EMPLOY AN ATTORNEY. IF YOU OR YOUR ATTORNEY DO NOT FILE A WRITTEN ANSWER WITH THE CLERK WHO ISSUED THIS CITATION BY 10:00 A.M. ON THE MONDAY NEXT FOLLOWING THE EXPIRATION OF FORTY TWO DAYS AFTER THE DATE THIS CITATION WAS ISSUED, A DEFAULT JUDGMENT FOR THE RELIEF DEMANDED IN THE PETITION MAY BE TAKEN AGAINST YOU. IN ADDITION TO FILING A WRITTEN ANSWER WITH THE CLERK, YOU MAY BE REQUIRED TO MAKE INITIAL DISCLOSURES TO THE OTHER PARTIES OF THIS SUIT. THESE DISCLOSURES GENERALLY MUST BE MADE NO LATER THAN 30 DAYS AFTER YOU FILE YOUR ANSWER WITH THE CLERK. FIND OUT MORE AT TEXASLAWHELP.ORG.
YOU ARE HEREBY COMMANDED to appear by filing a written answer to the Plaintiff's Petition at or before 10:00 o'clock A.M. on the Monday next after the expiration of 42 days after the date of issuance of this citation, the same being Monday, August 20, 2021 - before the Honorable 269th Judicial District Court of Williamson County, Texas, at the Williamson County Justice Center Courthouse, being located at 405 Martin Luther King Street, in the City of Georgetown, Texas. Said Plaintiff's Petition was filed in said court on the February 15, 2021 in the above entitled cause.

A brief statement of the nature of this suit is as follows, to-wit: You are hereby notified that, suit has been brought by Plaintiff THE HOMEOWNERS' ASSOCIATION FOR CHANDLER CREEK, INC. by and through its attorney of record, Greg Garza of Gagle Pugh, 4301 Westbank Drive, Bldg. A, Ste. 150, Austin, TX 78746, against Defendants Leticia Osuna and Estate of Luis Osuna, Deceased; and any unknown party who may claim as heir, devisee, grantee, assignee, lienor, creditor, trustee, or other claimant, by, through, or against Luis Osuna, Deceased regarding 1600 Llamana Drive, Round Rock, TX 78664 and more specifically described as: LOT 31 BLOCK "1" THE MEADOWS AT CHANDLER CREEK, SECTION FOUR (4), A SUBDIVISION IN WILLIAMSON COUNTY, TEXAS, ACCORDING TO THE MAP OR PLAT THEREOF RECORDED IN CABINET G, SLIDES 187-189, PLAT RECORDS OF WILLIAMSON COUNTY, TEXAS. This suit is for a Foreclosure, as is more fully shown by

the hearing. Persons wishing to speak for or against the assessment of the District may do so at the Public Hearing. Written comment may be submitted to the following address:
City of Georgetown
Attn: CMO/GVP/ID
PO Box 409
Georgetown, Texas 78627

NOTICE OF HEARING ON PROPOSED EXCLUSIONS OF LAND

Notice is hereby given that, in accordance with Sections 49.303-49.307, Texas Water Code, Williamson County Municipal Utility District No. 191 will conduct a hearing on the exclusion of land or other property from the District on the 11th day of August, 2021 at 11:30 a.m. The Board meeting at which the hearing will be conducted will be held via telephone conference pursuant to Section 551.125, Texas Government Code, as modified temporarily by Governor Greg Abbott, and the related guidance from the Office of the Texas Attorney General in connection with the Governor's COVID-19 Disaster Proclamation. Members of the public may participate in the meeting and address the Board of Directors during the hearing by calling the Toll-Free Dial-In Number for the Board meeting, 1-888-510-5505, and following the instructions provided by the system to access the meeting. The Participant Code for the meeting is 322512. An electronic agenda packet for the meeting is available at the following link:
<https://abusin.sharafilie.com/share/view/5d58144a2d143a28f0d05379-9b16-4b4c-8382-26562a2e2816>

All interested property owners are hereby advised of their right to present petitions for exclusion and to offer evidence in support of the petitions, and their right to contest any proposed exclusion based on either a petition or the Board's own conclusions and to offer evidence in support of the contest.

NOTICE OF RECEIPT OF APPLICATION AND INTENT TO OBTAIN AIR PERMIT PROPOSED AIR QUALITY PERMIT NUMBER 165848

APPLICATION: Exhior, Research Corporation, has applied to the Texas Commission on Environmental Quality (TCEQ) for:

Issuance of Permit 165848
This application would authorize construction of the Exhior Research facility located at 1100 County Road 236, Florence, Williamson County, Texas 76657. This application is being processed in an expedited manner, as allowed by the commission's rules in 30 Texas Administrative Code, Chapter 101, Subchapter J. This link to an electronic map of the site or facility's general location is provided as a public courtesy and not part of the application or notice. For exact location, refer to application, <http://www.tceq.texas.gov/assets/public/6b10f0d6xhtml?al=90.791111&lng=-97.904166&zoom=13&app=1>. The facility will emit the following contaminants: hydrogen sulfide, carbon monoxide, hazardous air pollutants, nitrogen oxides and organic compounds.

This application was submitted to the TCEQ on July 9, 2021. The application will be available for viewing and copying at the TCEQ central office, the TCEQ Austin regional office, and the East Ham, Beck, Florence, Williamson County, Texas beginning the first day of publication of this notice. The facility's compliance file, if any exists, is available for public review in the Austin regional office of the TCEQ.

Identified by name and physical address. The interests the group or association seeks to protect must also be identified. You may also submit your proposed adjustments to the application/permit which would satisfy your concerns.

If a hearing request is timely filed, following the close of all applicable comment and request periods, the Executive Director will forward the application and any requests for contested case hearing to the Commissioners for their consideration. The Commission may only grant a request for a contested case hearing on issues that were not subsequently withdrawn. If a hearing is granted, the subject of a hearing will be limited to disputed issues of fact or mixed questions of fact and law relating to relevant and material air quality concerns submitted during the comment period. Issues such as property values, noise, traffic safety, and zoning are outside of the Commission's jurisdiction to address in this proceeding.

MAILING LIST In addition to submitting public comments, you may ask to be placed on a mailing list to receive future public notices for this specific application by sending a written request to the Office of the Chief Clerk at the address below.

AGENCY CONTACTS AND INFORMATION Public comments and requests must be submitted either electronically at www14.tceq.texas.gov/eplc/Comment/, or in writing to the Texas Commission on Environmental Quality, Office of the Chief Clerk, MC-105, P.O. Box 13087, Austin, Texas 78711-3087. Please be aware that any contact information you provide, including your name, phone number, email address and physical address will become part of the agency's public record. For more information about this permit application or the permitting process, please call the Public Education Program toll free at 1-800-687-4040. Si desea informacion en Espanol, puede llamar al 1-800-687-4040.

Further information may also be obtained from Exhior, Research Corporation, 2350 Double Creek Drive, Round Rock, Texas 78664-3801 or by calling Dr. Thomas Bierschenk, PhD, Vice President at (512) 310-9044.
Notice Issuance Date: July 14, 2021

CITATION BY PUBLICATION THE STATE OF TEXAS COUNTY OF WILLIAMSON

TO ALL PERSONS INTERESTED IN THE ESTATE OF BOB HANSON, DECEASED, Cause No. 21-0751-CP4, in County Court at Law #4 of Williamson County, 405 Martin Luther King Street, Georgetown, Texas 78626
COLE HANSON, Applicant in the above numbered and entitled estate, filed on the 19th day of July, 2021 an APPLICATION FOR PROBATE OF WILL AND ISSUANCE OF LETTERS TESTAMENTARY AND REQUEST FOR DECLARATORY RELIEF of the said estate and requests that the said Court determine who are the heirs and only heirs of the said BOB HANSON, AKA BOB J. HANSON, DECEASED, and their respective shares and interest in such estate.

Said application may be heard at 10:00 o'clock a.m. on or after the first Monday next after the expiration of ten days from the date of publication of this citation, at the Williamson County Justice Center in Georgetown, Williamson County, Texas.
All persons interested in said estate are hereby cited to appear before said Honorable Court on or before above mentioned time and place by filing a written answer complying such application should they desire to do so.
If their attention is not served within or after after

the date of its issuance, it shall be returned unserved.
Issued and given under my hand and seal of office at Georgetown, Texas, this 22nd day of July, 2021.
Nancy E. Ristler
Williamson County Clerk
405 MLK Street, Box 14
Georgetown, Texas 78626
By/S/S: Kint, Deputy
Applicant's Attorney:
Rose Cohen
805 West 10th Street
Suite 100
Austin, TX 78701

NOTICE TO CREDITORS

Notice is hereby given that original Letters Testamentary for the Estate of Vivian Louise Wood, Deceased, were issued on July 22, 2021, in Cause No. 21-0736-CP4, pending in the County Court at Law No. Four, Williamson County, Texas, to John Calvin Wood.
All persons having claims against this Estate which is currently being administered are required to present them to the undersigned within the time and in the manner prescribed by law.
c/o: Ken Chain
Attorney at Law
PO Box 956
Georgetown, TX 78627
DATED the 22nd day of July, 2021.
/s/ Ken Chain, Attorney at Law

NOTICE TO ALL PERSONS HAVING CLAIMS AGAINST THE ESTATE OF PEARLIE MAE GAULT, DECEASED

Notice is hereby given that in Cause No. 16-0919-CP4, styled Estate of Pearlle Mae Gault, Deceased, pending in the County Court at Law No. 4, Williamson County, Texas, Letters of Dependent Administration were granted by said Court on June 30, 2021, to Chabonne L. Cowan, and she qualified as Dependent Administrator on July 13, 2021.
Claims may be presented and addressed to the personal representative of the estate in care of this attorneys at the following address:
COWAN & ASSOCIATES, PLLC
1403 West 6th Street
Austin, Texas 78703
FAX: (512) 475-8591
Tel.: (512) 697-2829
By: /s/ Chabonne L. Cowan
Chabonne L. Cowan
State Bar No. 007935556
Attorneys for Independent Executor

Williamson County's Engineering Department.

In accordance with National Flood Insurance Program regulation 65.70(1), hereby gives notice of the County's intent to revise the flood hazard information along Lackey Creek. The flood hazard revisions are being proposed as part of Letter of Map Revision (LOMR) Case No. 21-06-0778P. The removal of an existing high hazard earthen dam along Stan Gabriel Ranch Road has been replaced with a two-lane bridge. Construction on the bridge has completed which has modified the creek. The Letter of Map Revision (LOMR) request has been submitted that will, in part, revise the following flood hazards along Lackey Creek.
Phase Flood Elevations (FFE-F) will

by County Court at Law No. 4 of Williamson County, Texas, in cause No. 21-0717-CP4, pending upon the Probate Docket of such Court. All persons having claims against the Estate being administered are hereby requested to present the same within the time prescribed by law to:
John B. Saragusa, II, Independent Executor
of the Estate of Anthony J. Saragusa, Sr.,
Deceased c/o Luis M. Dita Dita Law, P.C.,
2900 Westslayn, Suite 150
Houston, Texas 77027

NOTICE TO CREDITORS

Notice is hereby given that original Letters Testamentary for the Estate of Darryl Lee Capparelli, Deceased were issued on July 19, 2021 in Docket No. 21-0709-CP4, pending in the County Court at Law Number Four of Williamson County, Texas, to:
Anerette Lee Capparelli
The residence of the Independent Executor is in Austin, Williamson County, Texas, but the post office address for notice is as follows:
c/o AKINS, NOWLIN & PREWITT, L.L.P. 896 Summit Street, Suite 106
P.O. Box 249
Round Rock, Texas 78680-0249

All persons having claims against the Estate which is currently being administered are required to present them within the time and in the manner prescribed by law.
DATED the 26 day of July, 2021.
AKINS, NOWLIN & PREWITT, L.L.P.
896 Summit Street, Suite 106
P. O. Box 249
Round Rock, Texas 78680
FAX: (512) 244-0001
FAX: (512) 244-9733
By: /s/ Wessley Prewitt
Wessley Prewitt
State Bar No. 24007872
ATTORNEYS FOR ESTATE

City of Georgetown Notice of Public Meeting

The City of Georgetown is considering the voluntary annexation of the following properties into the city limits. A Public Hearing will be held for each request at the August 10, 2021 City Council meeting beginning at 6:00pm. City Council meetings are located at the City Council Chambers, 510 W. 9th Street. Due to operational constraints resulting from the COVID-19 pandemic, this meeting may be held via a combination of in person and video conference or call in number. The final location of the meeting and instructions on how to join via the video conference or call in number meeting will be posted with the meeting agenda at agendas.georgetown.org the Wednesday prior to the meeting.

1. An approximately 39.969 acres of City-owned Right-of-Way situated in part in the Joseph Thompson Survey, Abstract No. 608, a right-of-way of varying width described to the City of Georgetown, Texas, generally located between Leander Road (FM2243) and the south fork of the South San Gabriel River to be known as the Southwest Bypass. (2021-2-ANX)
2. An approximately 20.00 acres of City-owned Right-of-Way situated in part in the J. Patterson Survey, Abstract No. 502 and the Barney C. Low Survey Abstract No. 385, a right-of-way of varying width described to the City of Georgetown, Texas, generally located between FM 1460 and IH 35 to be known as Westhollow Road. (2021-3-ANX)
After holding the required public hearings, the City Council will consider an ordinance for the annexation.
As a member of the general public you are

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COMMISSION
ON ENVIRONMENTAL
QUALITY

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CHIEF CLERKS OFFICE

A brief statement of the nature of this suit is as follows: You are hereby notified that suit has been brought by Plaintiff THE HOMEOWNERS ASSOCIATION FOR CHANDLER CREEK, INC. by and through its attorneys of record, Greg Garza of Cadle Pugh, 4301 Westpark Drive, Bldg. A, Ste. 150 Austin, TX 78746, against Defendants Laticia Osuna and Estate of Luis Osuna, Deceased, and any unknown party who may claim as heir, devisee, grantee, assignee, heir, creditor, trustee, or other claimant, by through, or against Luis Osuna, Deceased regarding 1600 Lantana Drive, Round Rock, TX 78664 and more specifically described as: LOT 31 BLOCK "1", THE MEADOWS AT CHANDLER CREEK, SECTION FOUR (4), A SUBDIVISION IN WILLIAMSON COUNTY, TEXAS ACCORDING TO THE MAP OR PLAT THEREOF RECORDED IN CABINET G, SIDES 187-189, PLAT RECORDS OF WILLIAMSON COUNTY, TEXAS. This suit is for a foreclosure, as is more fully shown by Plaintiff's Petition on file in this suit.

The officer executing this writ shall promptly serve the same according to requirements of law, and the mandates hereof, and make due return as the law directs.

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of July 2021.

By: /s/ Sabrina Rodriguez, Deputy Sabrina Rodriguez, Deputy
 ADDRESS OF LEAD ATTORNEY FOR DEBTLIN FIRM:
 Dawn Lyn Knox
 4301 Westpark Dr Bldg A Suite 150
 Austin TX 78746

Pursuant to Chapter 59.004 of the Texas Property Code, West County Storage, located at 4575 FM 971, West, Texas 78674, will hold a public sale of property being sold to satisfy a landlord's lien. This sale will be held on August 14th, 2021 at 11:00am at West County Storage. Property will be sold to highest bidder or cash. A deposit will be required for cleanup, and to withdraw property from sale. Unit items sold as-is to highest bidder. Property being sold includes contents in the unit or units of the following tenant(s): Gordon Draper, Chev Blazer, 1976 Idea Travel Trailer, Chev Truck, and storage unit, Ricky Williams, Kevin Fox, Randall Crawford, Tyler Williams, Eddie Jenkins, Servando Tavaraz, Stephanie Malay, Travis Jrs. Contents in the unit or units consist of household goods, exercise equipment, tools, furniture and misc. merchandise.

**CITY OF GEORGETOWN
 NOTICE OF PUBLIC HEARING**

Notice is hereby given of a public hearing to be held in accordance with Texas Local Government Code Chapter 372 at the regular meeting of the City Council, on August 10, 2021, at 6:00 PM at City Council Chambers, 510 W. 9th Street Georgetown, TX 78626. Meeting information is located at: <https://georgetown.org/public-meetings-calendar/>. To consider the proposal to assess each parcel of land in the Georgetown Village Public Improvement District #1 ("District") at a rate of \$0.14 per \$100 valuation based upon the annual assessed value of each parcel.

The general nature of the proposed services and improvements to be provided for the District include pocket parks, landscape areas, trees, sidewalks, trails, alleyways, distinctive lighting and signage, recreational facilities, water quality

allowed by the commission's rules in 30 Texas Administrative Code, Chapter 101, Subchapter J. This link to an electronic map of the site or facility's general location is provided as a public courtesy and not part of the application or notice. For exact location, refer to application. <http://www.leg.texas.gov/setses/public/hb10/index.html?title=90.791114&tag=97.904168&zoom=13&type=7>. The facility will emit the following contaminants: hydrogen fluoride, carbon monoxide, hydrocarbons air pollutants, nitrogen oxides, and organic compounds.

This application was submitted to the TCEQ on July 9, 2021. The application will be available for viewing and copying at the TCEQ central office, the TCEQ Austin regional office, and the Elia Hunt Beck, Florence, Williamson County, East Main Street, Florence, Williamson County, Texas beginning the first day of publication of this notice. The facility's compliance file, if any exists, is available for public review in the Austin regional office of the TCEQ.

The executive director has determined the application is administratively complete and will conduct a technical review of the application. **PUBLIC COMMENT/PUBLIC MEETING** You may submit public comments, or request a public meeting or a contested case hearing to the Office of the Chief Clerk at the address below. The TCEQ will consider all public comments in developing a final decision on the application. After the deadline for public comments, the executive director will prepare a response to all public comments.

The purpose of a public meeting is to provide the opportunity to submit comments or ask questions about the application. A public meeting about the application will be held if the executive director determines that there is a significant degree of public interest in the application, if requested by an interested person, or if requested by a local legislator. A public meeting is not a contested case hearing.

After technical review of the application is complete, the executive director may prepare a draft permit and will issue a preliminary decision on the application. Notice of Application and Preliminary Decision for an Air Quality Permit will then be published and mailed to those who made comments, submitted hearing requests or are on the mailing list for this application. That notice will contain the final deadline for submitting public comments.

OPPORTUNITY FOR A CONTESTED CASE HEARING You may request a contested case hearing. A contested case hearing is a legal proceeding similar to a civil trial in state district court. A contested case hearing will only be granted based on disputed issues of fact that are relevant and material to the Commission's decision. Further, the Commission will only grant a hearing on those issues submitted during the public comment period and not withdrawn. The deadline to submit a hearing newspaper notice is published. If a request is timely filed, the deadline for requesting a contested case hearing will be extended to 30 days after the mailing of the response to comments.

A person who may be affected by emissions of air contaminants from the facility is entitled to request a hearing. If requesting a contested case hearing, you must submit the following: (1) your name (or for a group or association, an official representative), mailing address, and daytime phone number; (2) applicant's name and permit number; (3) the statement "[w]e request

NING SUYEN, Georgetown, Texas 78626.

BOB HANSON, Applicant in the above numbered and entitled estate, filed on the 19th day of July, 2021 an APPLICATION FOR PROBATE OF WILL AND ISSUANCE OF LETTERS TESTAMENTARY AND REQUEST FOR DECLARATORY RELIEF of the said estate and requests that the said Court determine who are the heirs and only heirs of the said BOB HANSON, AKA/BOB J. HANSON, DECEASED, and their respective shares and interest in such estate.

Said application may be heard at 10:00 a.m. clock a.m. on or after the first Monday next after the expiration of ten days from the date of publication of this citation, at the Williamson County Justice Center in Georgetown, Williamson County, Texas.

All persons interested in said estate are hereby cited to appear before said Honorable Court on or before above mentioned time and place by filing a written answer corroborating such application should they desire to do so.

If this citation is not served within 90 days after the date of its issuance, it shall be returned unreserved and given under my hand and seal of office at Georgetown, Texas, this the 20th day of July, 2021

Nancy E. Ristler
 Williamson County Clerk
 405 MLK Street, Box 14
 Georgetown, Texas 78626
 By: /s/ S. Kim, Deputy
 Applicant's Attorney:
 Thomas J. O'Neala, Jr.
 7103 Ferrel Line Drive
 Austin TX 78749

NOTICE TO ALL PERSONS HAVING CLAIMS AGAINST THE ESTATE OF MELVALYN SUE HARPER TOUNGATE, DECEASED

Notice is hereby given that original Letters Testamentary for the Estate of MELVALYN SUE HARPER TOUNGATE, Deceased, were issued July 23, 2021, in Cause No. 21-0895-CP4, pending in County Court No. 4 of Williamson County, Texas, to DANA LYNN DEHLINGER. The notice to the Independent Executor may be delivered at the following address: c/o John M. Lane Law, PLLC – 1001 Cypress Creek Road, Suite 405, Cedar Park, Texas 78613. All persons having claims against this Estate which is currently being administered are required to present them within the time and in the manner prescribed by law. DANA LYNN DEHLINGER, Independent Executor of the Estate of MELVALYN SUE HARPER TOUNGATE, Deceased.

**CITATION BY PUBLICATION
 THE STATE OF TEXAS COUNTY OF WILLIAMSON**

TO ALL PERSONS INTERESTED IN THE ESTATE OF JULIA ANN INMAN, DECEASED

Law #4 No. 21-0893-CP4, in County Court at King Street, Georgetown, Texas 78626.

NICK EUGENE INMAN, Applicant, in the above numbered and entitled estate, filed on the 22nd day of July, 2021 an APPLICATION FOR DETERMINATION OF HEIRSHIP APPOINTMENT OF INDEPENDENT ADMINISTRATOR AND FOR ISSUANCE OF LETTERS OF INDEPENDENT ADMINISTRATION of the said estate and requests that the said Court determine who are the heirs and only heirs of the said JULIA ANN INMAN, DECEASED, and their respective

FAX: (512) 697-2829
 By: /s/ Claiborne L. Cowan
 Claiborne L. Cowan
 State Bar No. 00793558
 Attorneys For Independent Executor

Williamson County's Engineering Department

In accordance with National Flood Insurance Program regulation 65.7(b)(1), hereby gives notice of the County's intent to revise the flood hazard information along Lackey Creek. The flood hazard revisions are being proposed as part of Letter of Map Revision (LOMR) Case No. 21-06-078P. The removal of an existing high hazard earthen dam along San Gabriel Harsh Road has been replaced with a two-lane bridge. Construction on the bridge has completed which has modified the creek. The Letter of Map Revision (LOMR) request has been submitted that will, in part, revise the following flood hazards along Lackey Creek:

1. Base Flood Elevations (BFEs) will be established along Lackey Creek in the project area.
2. The SFHA will be established in the project area.
3. Water surface elevations (WSEL's) will increase along the project limits but will remain within the channel.

Maps and detailed analysis of the revision can be reviewed by Williamson County's Engineering Department located at 3151 S.E. Inner Loop, Ft. CFM, County Floodplain Administrator at 512-943-3330 for additional information from 8am to 5pm Monday - Friday.

**CLL MUNICIPAL UTILITY DISTRICT NO. 1
 NOTICE OF RATE ORDER AND RULES**

Notice is hereby given that on July 21, 2021, the Board of Directors of CLL Municipal Utility District No. 1 of Williamson County adopted a rate order containing rates and rules governing installation of connections to the sanitary sewer system of the District; limitations on flow of waste into the District's sanitary sewer system; fees and rates for sewer service and drainage service; provisions for enforcement of the rates and rules; and penalties for violations.

Breach of the rate order and rules will subject the violator to a penalty in the amount of \$200.00 per violation per day.

The full text of the rate order and rules is on file in the offices of the district at Terriann, Shanady & Hamala, P.C., 102 N. Railroad Avenue, Pflugerville, TX 78660, where they may be read by any interested person.

CITY OF GEORGETOWN

The City of Georgetown is accepting sealed bids for the following project:

Invitation to Bid # 202150 Lake Water Treatment Plant

30" Raw Water Line Improvements
 All sealed bids are due August 24, 2021 at 2:00 PM CST

Bids may be electronically submitted through the City E-bid system accessible via City's web site at: <https://downtownx.com/wave/new/CurrentSourcings.aspx>

Sealed bids may be submitted in hard copy at the following address:
 Georgetown Municipal Complex
 Purchasing Department
 300-1 Industrial Ave
 Georgetown, TX 78626

To obtain information on the bid and to register

will be posted with the meeting agenda at agendas.georgetown.org the Wednesday prior to the meeting.

1. An approximately 39,969 acres of City-owned Right-of-Way situated in part in the Joseph Thompson Survey, Abstract No. 608, a right-of-way of varying width described to the City of Georgetown, Texas, generally located between Leander Road (FM 2243) and the south fork of the South San Gabriel River to be known as the Southview Bypass. (2021-2-ANX)

2. An approximately 20,000 acres of City-owned Right-of-Way situated in part in the J. Patterson Survey, Abstract No. 502 and the Barry C. Low Survey, Abstract No. 385, a right-of-way of varying width described to the City of Georgetown, Texas, generally located between FM 1460 and IH 35 to be known as Westinghouse Road. (2021-3-ANX)

After holding the required public hearings, the City Council will consider an ordinance for the annexation.

As a member of the general public you are invited to be present at such meeting if you desire to discuss the proposed change or advisability of any other change. A copy of the planning report related to these items will be available at the Planning Department located at 809 Martin Luther King Jr. Street or at agendas.georgetown.org, no later than the Friday prior to the meeting described above. For further information, call the Planning Department office at 512-993-3575.

For additional information, please contact Nat. Waggoner in the Planning Department, 512-930-3584 or email at nat.waggoner@georgetown.org.

NOTICE TO CREDITORS

Notice is hereby given that original Letters Testamentary for the Estate of HAMID FORUGH Deceased, were issued on July 20, 2021, in Cause No. 21-0670-CP4 pending in the Probate Court of Williamson County, Texas to SEPIDEH HARIRI. Claims may be presented in care of the attorney for the Estate, addressed as follows:

Personal Representative,
 Estate of Hamid Forough, Deceased
 c/o: The Fowler Law Firm, P.C.
 Attn: David S. Oliver
 312 West University Avenue
 Georgetown, Texas 78626

All persons having claims against this estate, which is currently being administered, are required to present them within the time and in the manner prescribed by law.

DATED the 20th day of July 2021.
 By: /s/ David Oliver

David Oliver
 Attorney for Sepideh Hariri
 State Bar No.: 00797175
 312 W. University Ave.

Application has been made with the Texas Alcoholic Beverage Commission for a BG permit by Minh Nguyen dba Misaki, to be located at 3001 Joe DiMaggio Blvd Ste 1200, Round Rock, Williamson, Texas. Officer of said corporation is Minh Nguyen, director.

TEXAS
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2021 AUG -9 AM 10:20

CHIEF CLERKS OFFICE

TCEQ-Office of the Chief Clerk
MC-105 Attn: Notice Team
P.O. Box 13087
Austin, Texas 78711-3087

Applicant Name: Exfluor Research Corporation
Permit No.: 165848
Application Received Date: July 9, 2021

ALTERNATIVE LANGUAGE AFFIDAVIT OF PUBLICATION FOR AIR PERMITTING

STATE OF TEXAS §
COUNTY OF Travis §

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2021 AUG -9 AM 10:19
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BEFORE ME, the undersigned authority, on this day personally appeared

Irma Beatriz Portuondo, who being by me duly sworn, deposes and says that (s)he is (Name of Person Representing Newspaper)

the Traffic Manager of the El Mundo Newspaper
(Title of Person Representing Newspaper) (Name of the Newspaper)

that said newspaper is generally circulated in Williamson County, Texas;
(The municipality or county in which the facility or proposed facility is located)

that the enclosed notice was published in said newspaper on the following date(s):

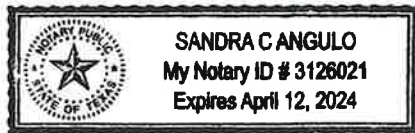
July 29, 20201.

Irma Portuondo
(Newspaper Representative's Signature)

Subscribe and sworn to before me this the 29th day of July, 2021
to certify which witness my hand and seal of office.

Sandra Carolina Angulo
Notary Public in and for the State of Texas

[Affix Seal]



Sandra Carolina Angulo
Print or Type Name of Notary Public

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APP-00222

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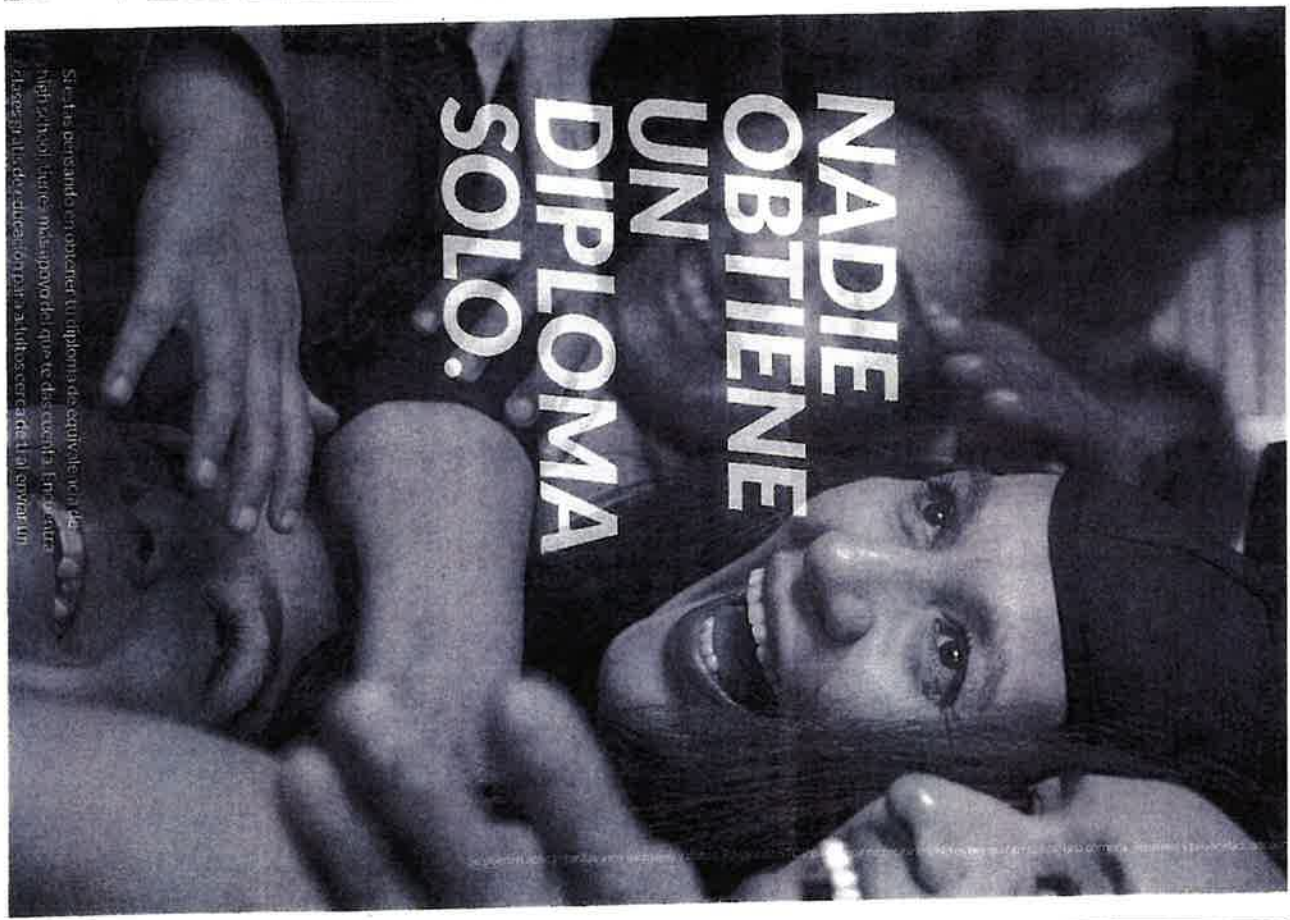
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LETRA DE COMBES Además de presentar comentarios públicos, puede pedir ser incluido en una lista de correo para recibir futuras notificaciones sobre esta solicitud específica, al enviar una peticion por escrito a la Oficina del Secretario General de la TCEQ a la dirección correspondiente.

CONTACTOS DE LA AGENCIA E INTERMEDIACIÓN Comentarios públicos y peticiones se deben entregar electrónicamente a WATER.LISTEN@STATE.TX.GOV o escrito a la Texas Commission on Environmental Quality, Oficina del Secretario Oficial, MC 105, 12650, P.O. Box 13007, Austin, Texas 78711 3897. Por favor venga en persona que cambiar información de contacto que proporcione. Incluyendo su nombre, número de telefono, dirección de correo electrónico y dirección física, se agregará al registro público de la agencia. Para más información sobre el proceso de peticion, por favor llame sin costo al Programa de Educación del Público al 1-800-887-4940. Si desea información en español, puede llamar al 1 800 887 2940.

Se puede obtener información adicional visitando el Centro de Recursos Comunitarios, 2350 Doudle Crest Drive,

su propiedad con relación a la patria; (6) una descripción de como usa la propiedad que puede venir afectada por la patria; y (7) una lista de todas las condiciones de hecho en el momento que se comentaron. Si la patria le hace un grupo o una asociación, uno o más miembros que tienen derecho a solicitar una audiencia deben ser identificados por su nombre y dirección física. Los intereses de grupo o el grupo o la asociación buscan profesor también deben ser identificados. También puede presentar sus modificaciones propuestas a la secretaría peticion que satisficran sus inquietudes.

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2021 AUG -9 AM 10: 19

CHIEF CLERKS OFFICE

Paul Worrall

From: luke.bernhard@exfluor.com
Sent: Thursday, August 5, 2021 10:33 AM
To: PROOFS; R6AirPermitsTX@EPA.gov; Joel Stanford
Subject: TCEQ Air Permit 165848 Proof of Public Notice
Attachments: Proof of publication.PDF

Please see attached proofs of publication for public notice in both the Spanish and English Newspapers that generally circulate in the area of the proposed site for Exfluor Research Corporation. The affidavits of publication are also included. Please let me know if you have any questions.

Luke Bernhard
Exfluor Research
EHS Manager
Round Rock, Texas
C: 512-762-6622
O: 512-310-9044
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August 5, 2021

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Office of the Chief Clerk
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Austin, Texas 78711-3087

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2021 AUG -9 AM 10:19
CHIEF CLERKS OFFICE

Re: Permit No. 165848
Project No. 331049

Attached are the proofs of publication in both the English Newspaper and Spanish Newspaper that generally circulate in Williamson County and around our new proposed site for Exfluor Research Corporation. The affidavits of publication for both publications are also included.

If you have any questions, please don't hesitate to contact me at (512) 310-9044 or luke.bernhard@exfluor.com.

Sincerely,



Luke Bernhard
EHS Manager

Application Exhibit 7

Response to TCEQ ED Application Questions

From: Joerg Windolph <JWindolph@WAID.com>
Sent: Thursday, September 2, 2021 5:06 PM
To: Cara Hill
Cc: luke.bernhard@exflur.com; 'Tom Bierschenk'
Subject: Exflur Research Corporation - Permit No. 165848 Application
Attachments: 20210902 Def Response Letter Non Confidential.pdf

Cara,

On behalf of Exflur Research, I am submitting a response to your questions regarding Permit 165848 that you sent to Exflur on August 3, 2021. This email has only the non-confidential items of the response attached. The confidential part of the response will be submitted via TCEQs secure ftp site. Please let us know if you have any other questions or comments.

Thank you,

Joerg Windolph, P.E.
Principal Engineer

Waid Environmental

13785 Research Blvd., Suite 100

Austin, Texas 78750

Office: 512-255-9999

Cell: 512-550-8147

<http://www.waid.com>

Privilege and Confidentiality Notice

The following electronic message contains information that should be treated as confidential or privileged. The information is intended to be for the use of the individual or entity named above. If you are not the intended recipient, be aware that any disclosure, copying, distribution or use of the contents of this message is prohibited. If you have received this electronic message in error, please notify us immediately by telephone at (512) 255-9999.



September 2, 2021

Ms. Cara Hill
Air Permits Division, MC 163
Texas Commission on Environmental Quality
P.O. Box 13087
Austin, TX 78711-308

Submitted via Email

Re: Exflur Research Corporation
Permit Application No. 165848
Regulated Entity No. RN110969227
Customer No. CN602696791
TCEQ Project No. 331049

Dear Ms. Hill:

On behalf of Exflur Research Corporation (Exflur), I am submitting the attached response to your request for information dated August 3, 2021. Detailed responses for each of the items you requested are included in the following attachments.

- Attachment 1: Detailed Responses to August 3, 2021 Additional Information Request Letter
- Attachment 2: PI-1 Application Workbook
- Attachment 3: Non-Confidential Process Description
- Attachment 4: Non-Confidential Area Map
- Attachment 5: Non-Confidential Plot Plan
- Attachment 6: Non-Confidential EcoSys Marathon Device Data
- Attachment 7: Updated **CONFIDENTIAL** Process Flow Diagram
(Transmitted via TCEQ Secure FTP)
- Attachment 8: Updated **CONFIDENTIAL** Process Description
(Transmitted via TCEQ Secure FTP)
- Attachment 9: Updated **CONFIDENTIAL** Emissions Calculations
(Transmitted via TCEQ Secure FTP)

This submittal includes **CONFIDENTIAL** information which is segregated and clearly labeled. Please handle this information accordingly.

Should you have any questions regarding this submittal or require additional information, please do not hesitate to contact Luke Bernhard at (512) 310-9044.

Sincerely,

Joerg Windolph, P.E.
Principal Engineer

JOW/tpv

Attachments

cc: Air Program Director, TCEQ Region 11, Austin, w/attachments

ATTACHMENT 1
RESPONSES TO E-MAILED QUESTIONS

The information in this attachment is in response to the request for information dated August 3, 2021. The questions appear below in bold font, followed by Exfluors' response in normal font.

General

1. **A process description was provided with the submitted application, however it was submitted confidentially. Although a detailed confidential process description is acceptable, a non-confidential version is required for the public file. Please provide a non-confidential process description for the public file.**

Exfluors' Response

A non-confidential process description is included in non-confidential Attachment 2.

2. **The provided plot plan indicates that there will be a fire water tank. Please clarify if there will be any emergency firewater pumps. If so, please provide updates to the application that include the emergency engines and diesel tank, including Form PI-1, calculations and a BACT review.**

Exfluors' Response

There will not be an emergency firewater pump at the site. In case of a fire, Exflur will use the fire departments truck engine to pump the water. Exflur will use a permit by rule to authorize an emergency firewater pump engine if needed in the future.

3. **Area Map: An area map was provided with the application, however it does not adhere to the following requirements: The provided area map should be adequate for a person who has never visited the area to be able to find the site. If an effects review is required, significant landmarks such as buildings, residences, schools, parks, churches, hospitals, day care centers, etc., should be noted. Please note the name and location of all schools (if any) located within 3,000 feet of the site boundary, as Texas law requires that these schools are reviewed for potential emissions impacts. The APD prefers that applicants submit a representation of the site property line on 7.5 minute series United States Geological Survey (U.S.G.S.) topographical maps (scale is equal to 1:24,000). Should the applicant not use a U.S.G.S. map or a TNRIS aerial photograph, the area map must show all of the same features present on a U.S.G.S. map which include a true north arrow, a scale, the entire plant property and the location of the property relative to prominent geographical features such as highways, roads, streams, and significant landmarks such as buildings, residences, schools, parks, and churches. Please provide an updated area map accordingly and ensure that any labels on the map can be easily read.**

Exfluors' Response

An updated area map is included in non-confidential Attachment 3.

PI-1 Application Workbook

4. **General:** Please ensure the updated workbook includes the permit number (row 54), as it has been assigned since the initial submittal.

Exfluors' Response

An updated workbook is included in non-confidential Attachment 2. The updated workbook includes the Permit No. 16588 in row 54 of the "General" tab of the workbook.

5. **General:** Section V.B of this tab indicates a projected start of construction as November 1, 2021, with a project start of Operation as December 1, 2021. Please clarify if this site is currently operating under Permit by Rule (PBR), as the represented 30-days between start of construction and operation does not seem feasible to construct the proposed project.

Exfluors' Response

The site is not currently operating under PBR. The projected start dates of construction and operation that were provided in the application submitted on June 25, 2021 were incorrect. The correct start date of construction will be February 1, 2022 and the projected start of operation will be December 1, 2022.

Exflur will be leasing the property and building. The owner of the property is expected to start on the construction of the building on February 1, 2022. The build-out of the building to meet Exfluors process requirements will not begin until Exflur has received draft permit conditions. The enclosed NSR workbook has been updated with the new dates.

6. **Technical:** Section IX.B of this tab represents that a disaster review is required for hydrogen fluoride (HF). The amount of HF will exceed a threshold quantity in 40 CFR Part 68 that will require a Risk Management Plan (RMP) prepared in accordance with EPA regulations on Chemical Accident Prevention Provisions promulgated in 40 CFR Part 68. Please submit a copy of the current RMP Disaster review for HF or indicate that one will be prepared prior to starting operations.

Exfluors' Response

The required Risk Management Plan and associated Disaster review will be prepared and implemented before starting operation of the plant.

7. **Unit Types – Emission Rates:** Column O of this tab of the PI-1 Application Workbook does not accurately reflect the Unit Types represented in the rest of the application materials. Specifically, multiple sources are identified as 'Process Vents' rather than the control device that they are routed to. Examples of some of the discrepancies found are as follows:

- EP3-1 (exhaust gas vent system), BACT section says this is controlled by a TO followed by scrubbers while Unit Type is identified as 'process vent';

Exfluors' Response

The exhaust gas vent system emission point EP3-1 has been separated into the control devices and the vent sources that are controlled. The control devices are two thermal oxidizers (TO-1 and TO-2) which are followed each by a scrubber. The third thermal oxidizer that was originally proposed will no longer be used. The controlled sources include several reactors, distillation units, an extraction tank, and flasks. All

of the controlled sources are identified as a single item under Unit Type "process vent". The two thermal oxidizers are also grouped together and are identified as Unit Type "Control: Oxidizer: Thermal" in the updated NSR workbook

- **EP3-2, EP-3 (washing reactors 1 and 2), and EP3-4 (water reservoir), BACT section proposes no control stating <0.3 tpy non-halogenated VOC emissions and economically infeasible for additional controls, while Unit Type is identified as 'process vent';**

Exfluors' Response

The washing reactors 1 and 2 (EP3-2 and EP3-3) are open-top vessels that have partial covers or lids with a hole for a mixer shaft. The washing reactors are proposed to be uncontrolled based on their small emission rates. The Unit Type for the washing reactors 1 and 2 has been changed to "Other".

The water reservoir (previously EP3-4) has been removed from the process and is no longer part of this application. The emissions calculation, emissions summary, and NSR workbook have been updated.

- **EP3-5 (evaporation pond), BACT section says routed to TO while Unit Type is identified as 'wastewater facilities'**

Exfluors' Response

The wastewater from the scrubbers that are part of the Thermal Oxidizer control system is pumped to the neutralization tank to which a lime slurry is added to neutralize the water and to precipitate out any remaining fluorides as calcium fluoride. The water then flows into a settling tank where the calcium fluoride is allowed to settle to the bottom of the tank. The treated water then flows from the top of the tank to the evaporation pond (renumbered to EP3-4). The evaporation pond is uncontrolled and the Unit Type is "wastewater facilities". There are no emissions expected from the wastewater and evaporation pond.

As stated in instruction 5 of this tab, the "Unit Types" column will be used to pre-populate the *BACT* and *Monitoring* requirements in later tabs of the workbook. Please provide an updated workbook which correctly represents the control devices which have been represented to control each FIN.

- a. **Note that by correcting Column O, the *BACT* and *Monitoring* tabs will update to reflect the correct requirements, which will have to be readdressed accordingly.**

Exfluors' Response

An updated workbook is provided in Non-Confidential Attachment 1 that represents the control devices correctly. The BACT and Monitoring tabs of the workbook have been updated to reflect the correct requirements.

8. ***Unit Types – Emission Rates, BACT:* When comparing the workbook to the application materials, it appears that multiple sources proposed for this facility have not been represented within the workbook, therefore the *BACT* tab does not include an analysis for each source and control device as required. Please provide a complete BACT review for all sources (source and proposed control) that have not been included in the workbook.**

Exfluors' Response

The emissions from the thermal oxidizers are grouped under EPN EP3-1. The thermal oxidizers control various sources including various reactors, distillation units, reduction reactors, hydrolysis reactors, methanolysis reactors, bromination reactors, extraction tank, anhydride flask, acrylate flask, and drying flask. All of these sources are classified as "process vent" unit types in the workbook and thus BACT and monitoring requirements for these sources are identical. The BACT and monitoring requirements are shown under the Exhaust Gas Vent System (EP3-1).

Control Devices

9. **Multiple discrepancies have been noted between the submitted application materials regarding how each source is proposed to be controlled, as well as the specific number of control devices and their appropriate source names. Please see the table below as it has been attempted to clearly identify each control device. Note that some sources require further distinction and may not be accurately represented, or may be missing from this table:**

EPN	Source Name
EP3-1	Thermal Oxidizer 1
EP3-1	Thermal Oxidizer 2
EP3-1	Thermal Oxidizer 3 (no longer proposed)
EP3-1	Thermal Oxidizer 1 Scrubber
EP3-1	Thermal Oxidizer 2 Scrubber
EP3-1	Thermal Oxidizer 3 Scrubber (no longer proposed)
See item below	F ₂ Scrubber 1
See item below	F ₂ Scrubber 2
EPN3-1	HF Adsorber(s)

- a. **Please ensure all control device names represented in the process flow diagram are consistent with the equipment tables.**

Exfluors' Response

Yes, all control device names represented in the process flow diagram are consistent with the equipment tables. The thermal oxidizer 3 has been removed from the application and is not proposed for the site anymore.

- b. **Page 4 of the confidential file (Sections 2.15 and 2.26) indicates that a condenser is proposed to be utilized for control. Please clarify the use of this source as a condenser is not accepted as a proposed control device.**

Exfluors' Response

The Reduction Reactors 1, 2, and 3 and the drying flask are equipped with condensers to reduce the exhaust vent flow rate of the sources. However, the emission calculations from these four sources do not use any control efficiency from the condensers.

Please ensure that the response clearly identifies all proposed sources by EPN/FIN, along with all proposed control devices. Please ensure that the application materials, PI-1 workbook (*Unit Types-Emission Rate* tab, Column O, mentioned in the item above), BACT analysis, etc. are consistent throughout the updated response.

Exfluors' Response

All proposed sources are clearly identified by EPN/FIN along with the proposed control devices in the process description, PI-1 workbook, BACT analysis, and emissions calculation section of the application. Thermal Oxidizer 3, the Solvent Water Reservoir (EPN EP3-4), and the Solvent Strip Column 3 fugitives (FUG3-5) have been removed from the process. The EPN from the Evaporation Pond has been changed from EP3-5 to EP3-4.

10. ***Thermal Oxidizer:*** The submitted calculations and workbook representations do not include speciated Particulate Matter for the thermal oxidizer(s) as a result of the combustion of hydrocarbons. Please provide updated calculations (and an updated workbook, BACT, etc.) which include PM for the thermal oxidizer(s).

Exfluors' Response

Emissions calculation for particulate matter for the two thermal oxidizers is included. Thermal oxidizer 3 will no longer be installed at the site. The thermal oxidizer emissions calculation have been updated. The calculations are considered confidential and are included in Confidential Attachment 8. The workbook, BACT, etc. has been updated to reflect particulate matter emissions from the thermal oxidizers.

11. The application materials indicate that there is a proposed back-up air scrubber but does not clarify what this source is proposed to be used for or provide calculations, BACT, etc. for this back-up source. Similarly, the application materials (confidential page 164) indicate a backup TO/scrubber is proposed to be on standby 'in case the bypass condition persists for more than 24 hours'. Please clarify if these are two separate proposed back-up control devices (i.e., a back-up scrubber and a backup TO/scrubber) and clarify if this 'back-up' scenario is for potential upset conditions. Note that the NSR permit only authorizes routine and identified MSS activities and does not permit upset scenarios.

Exfluors' Response

There will not be a back-up air scrubber or a backup TO/scrubber used at the site. Exflur will have shutdowns in place to prevent any upsets. MSS activities will be authorized through PBR 106.263.

12. An equipment table for a HF adsorber was included at the end of the confidential application materials (Table 15, pdf. Page 166), however such a device does not appear to be mentioned anywhere else in the application and is not found on the process flow diagram. Please clarify the discrepancy.
 - a. Additionally, please clarify if this equipment table is intended for one adsorber or multiple, as the 'Name of Abatement Device' is specified as Adsorbers rather than for one adsorber.

Exfluors' Response

The HF adsorber is also known as the HF recovery system. This system operates as a pair of adsorber columns. Each column pair is identified as a single unit in the PFD (i.e. HF recovery system 1a represents

2 columns while recovery system 1b represents another 2 columns). Recovery system 1a will be the primary adsorber column pair while the 1b is the secondary column pair. The exhaust gas passes through each system before going to the thermal oxidizer. The HF adsorber system is used to recover as much HF from the exhaust gas in order to recycle and reuse it in the process. Each HF adsorber pair is alternatively used. One pair is being used to adsorb the exhaust gas while the other pair is being regenerated and recovering the adsorbed HF. The HF recovery system drawing is on the last page of the confidential permit application and that drawing represents 1 (one) pair. Exflur will have 4 HF adsorber systems at the facility.

Wastewater

13. **The submitted application materials included the wastewater treatment summary, however additional information is still required to verify the proposed representations:**
- a. **Please provide a detailed description of the wastewater treatment process. Note that this can be included as part of the main process description. Please include a description of each step through the process beginning with the collection system, description of the type of biological treatment unit(s), identification of any control device(s), and indication of the final disposition of the treated wastewater and other waste products.**

Exfluors' Response

The wastewater from the scrubbers that are part of the Thermal Oxidizer control systems contain the majority of the HF and acid fluorides from the waste gas streams. The scrubbing water is low in pH and high in fluorides. After scrubbing, the water is pumped to the neutralization tank to which lime slurry is added to neutralize the water to a pH around 8.0 and to precipitate out the remaining fluorides as calcium fluoride. The water then flows into the settling tanks where the water is not agitated and the calcium fluoride is allowed to settle to the bottom of the tank. The treated water then flows from the top of the tank to the evaporation pond. The settled calcium fluoride is pumped off the bottom into the filter press to remove the calcium fluoride.

The wastewater treatment process does not include a biological treatment unit or any control devices.

- b. **Please ensure the plot plan includes all units and emission sources from the wastewater treatment plant, labeled with the FINs/EPNs and at a scale where the lettering is legible.**

Exfluors' Response

The plot plan includes all units/emission sources of the wastewater treatment system. The wastewater tanks contain neutralized water with inorganic salts that have no vapor pressure. Emissions are not expected from these sources.

- c. **Please provide all Water9 files to go along with the Water9 summary report for each unit in the treatment system so that the input for each unit can be verified. Page 22-1 of the Water9 User's Guide contains an example of a printout for a unit and a copy of the Water9 User's Guide can be found at this location:**

<https://www3.epa.gov/ttn/chief/software/water/water9/water9%20manual.pdf>

Exfluors' Response

The solvent strip column 3 and associated solvent water reservoir have been removed from the process. The Water9 calculations are no longer necessary.

- d. Please identify any compounds that were manually added to the Water9 compound library.**

Exfluors' Response

The solvent strip column 3 and associated solvent water reservoir have been removed from the process. The Water9 calculations are no longer necessary.

- e. Please indicate whether any of the default properties for compounds in the Water9 library were changed. If any property of the library was edited, please identify the changes to the property.**

Exfluors' Response

The solvent strip column 3 and associated solvent water reservoir have been removed from the process. The Water9 calculations are no longer necessary.

- f. Page 20 of the confidential file states that stripped gases from Solvent Strip Column 3 are routed to a thermal oxidizer. This thermal oxidizer appears to be Thermal Oxidizer 3 according to the process flow diagram. Please verify if this is correct;**

Exfluors' Response

The solvent strip column 3 has been removed from the process.

- g. Page 20 of application indicates that the stripper is propose to remove 99% of VOC, followed by a TO proposing to destroys 99.9% of the remaining VOC. Typically, when control devices are in series, the second control device is not able to control the small amounts of VOC left in the stream and therefore will not achieve 99.9% destruction efficiency. Please provide a vendor guarantee which says that this TO will remove 99.9% of what is left after the stripper removes 99% VOC.**

Exfluors' Response

The solvent strip column 3 has been removed from the process.

- h. Please clarify if the neutralization tanks and settling tanks are covered or if they are vented to a control device. If vented to control, please clearly identify which control device they are routed to.**

Exfluors' Response

The wastewater tanks (neutralization and settling tanks) are open top and are not vented to any control devices. There are no emissions expected from the neutralization tanks and settling tanks.

- 14. Please clarify if the represented evaporation pond is proposed to be utilized for storage or if it will be controlling pollutants. Please also clarify what happens to the water.**

Exfluors' Response

The evaporation pond is used for storage and a way of disposing of the wastewater by means of evaporation. The water will be treated before going to the evaporation pond. Emissions are not expected from the evaporation pond.

Fugitives

15. **EPN FUG-3-1:** The proposed short-term emission rates for F2 and H2 were consistent with the total emissions represented across the submitted fugitive workbooks; however, the annual emission rates proposed in the application workbook for F2 and H2 are not consistent with the calculated values. Please address the discrepancies shown below:

Contaminant	Proposed		Calculated	
	lb/hr	tpy	lb/hr	tpy
HF	0.1	0.56	0.10	0.45
H2	0.06	0.26*	0.06	0.25*
Note, the discrepancy for H2 may be due to a rounding error				

Please address the discrepancies and provide either and updated PI-1 or updated fugitive emission workbooks accordingly.

Exfluors' Response

The emission rates for hydrogen fluoride (HF), fluorine (F₂), and hydrogen (H₂) are correctly shown in the submitted workbook. Based on the submitted fugitive calculations, the emission rates for HF, F₂, and H₂ from EPN FUG3-1 are as follows:

Contaminant	(lb/hr)	(ton/yr)
Hydrogen fluoride	0.1268	0.5554
Fluorine	0.1033	0.4526
Hydrogen	0.0581	0.2547

16. **EPN FUG-3-1:** The following compounds were represented in the submitted fugitive emission workbooks, however they were not represented in the submitted .pdf confidential emissions calculations (pages 15-21) to clarify if they were to be included as part of the total proposed 'Carbon Compounds – excluding VOC and CO' emission rates. Please clarify if the following compounds were included in the total VOC, or the total Carbon Compounds, so that the speciated fugitive emission representations may be verified: 1,1,2-trichloro-1,2,2-trifluoroethane, Octafluoropropane, Perfluorobutyryl Fluoride, Perfluoro-t-butyl cyclohexane, and tetradecafluorohexane

Exfluors' Response

The emissions of 1,1,2-trichloro-1,2,2-trifluoroethane (CAS 76-13-1), octafluoropropane (CAS 76-91-7), Perfluoro-t-butyl cyclohexane, and tetradecafluorohexane (CAS 355-42-0) are included as part of the total proposed 'Carbon Compounds – excluding VOC and CO emissions.

The emissions of Perfluorobutyryl Fluoride are included in the total VOC emissions.

17. **EPN FUG3-3 and FUG 3-4: Note the proposed short-term values of HCL for these EPNs (0.01 lb/hr) calculated to <0.01 lb/hr. Please update the workbook to represent <0.01 lb/hr HCl for Eps FUG3-3 and FUG3-4, consistent with the submitted fugitive emissions calculations.**

Exfluors' Response

The workbook has been updated with HCl emissions of <0.01 lb/hr for EPNs FUG3-3 and FUG3-4 as well as for FUG3-2.

18. **Please clarify why water has been speciated for EPNs FUG3-2, FUG3-3, FUG3-4, and FUG3-5 (represented in submitted fugitive workbooks 4 and 5)**

Exfluors' Response

Water was represented in the speciation to show 100% composition of the stream.

19. **The PI-1 workbook for EPNs FUG3-3, FUG3-4, and FUG3-5 represent proposed emissions for Carbon Compounds excluding VOC and CO; however, the submitted fugitive workbook 5 appears to only speciate emissions of VOCs and HCl. Please clarify what contaminants have contributed to the proposed Carbon Compound emissions for these EPNs.**

Exfluors' Response

EPNs FUG3-3, FUG3-4, and FUG3-5 only have speciated emissions of VOC and HCl. The three fugitive emission points do not have emissions of Carbon Compounds excluding VOC and CO. The Carbon Compounds excluding VOC and CO emissions are therefore deleted from the fugitive and NSR workbooks.

- a. **Additionally, please clarify whether the speciated emissions of water (see item above regarding why water has been speciated) contributed in part to those proposed rates.**

Exfluors' Response

No, water emissions are not included in any of the proposed rates.

20. **Please provide the basis for the speciation represented in the submitted emissions calculations.**

Exfluors' Response

The speciation represented in the submitted emissions calculation are based on the compounds that are used as raw material in a process or that will be produced at the various processes in the plant.

21. **The application proposes to utilize the 28AVO Leak Detection and Repair (LDAR) program for fugitive emissions. Please note that HF fugitives are controlled visually with the utilization of HF detection paint and are also subject to the 28AVO LDAR program. The application did not mention use of HF detection paint. Please verify that HF detection paint will be utilized for HF fugitive emissions.**

Exfluors' Response

Exflur will be using the 28AVO LDAR program for the HF fugitive emissions without the HF detection paint as the odor threshold for HF is very low.

22. **The application proposes AVO monitoring, however the application also indicates that AVO inspections will not occur on weekends or holidays. Please note that this is not acceptable as leaks can occur at any time. Please refer to the TCEQ Fugitive Guidance (APDG 64422v2), which states that although the inspection frequency given in the 28AVO condition may be reduced on a case-by-case basis, it may not be reduced to less than once per shift. Please update the application materials to reflect the appropriate monitoring frequency.**

Exfluors' Response

The plant will be operated with one shift per day. Exflur will be performing the AVO monitoring checks at the facility every day, including weekends and holidays. Exflur is proposing that the AVO monitoring be conducted once per shift.

Other

23. **The TCEQ criteria for achieving 100% capture of emissions requires that the face velocity across all of the openings in a building, be greater than 100 feet per minute (fpm). Please note the face velocity for openings in the building can be determined by taking the exhaust flow rate (in cubic fpm) as determined from the capacity of the exhaust fan(s) and subtracting the flow rate for any air makeup fans that force air into the building and dividing the resulting flow rate by the area of the openings. Please provide calculations that demonstrate adequate face velocity across all openings in the building, otherwise emissions will be assumed to be exiting building openings.**

Exfluors' Response

Exflur did not represent in the application that 100% of the emissions released inside the building are captured and then emitted through a roof vent or vent to atmosphere. As shown in the modeling submitted on July 7, 2021, the building fugitives are emitting through building openings to atmosphere.

24. **Please provide calculations for speciated PM emissions for the filter press and handling of the dried precipitate, or provide clarification as to why PM would not be present.**

Exfluors' Response

The precipitate is not 100% dry. The 'dried' precipitate (calcium fluoride) is dropped into a trash bin which is then disposed as class 3 waste. Since the precipitate is still wet, PM emissions are not expected from the filter press.

25. **Please ensure that vendor data is provided for all proposed control devices to verify the proposed efficiencies represented in the calculations.**

Exfluors' Response

Destruction/Removal Efficiency Data for the EcoSys Marathon Integrated Combustion-Wet Abatement Device is provided in Non-Confidential Attachment 6.

26. The application indicates that TO1 and TO2 are proposed to utilize pure H₂ fuel from cylinders, however it is unclear as to the type of fuel proposed for TO3. Please clarify how TO3 will be fueled.

Exfluors' Response

The third Thermal Oxidizer 3 (TO3) will not be installed at the site.

27. The application materials include 136 chemicals which do not have a defined ESL and do not appear to have been included in the impacts analysis. Please clarify if TCEQ Toxicology has been contacted and has confirmed that this approach is acceptable and clarify how these contaminants are proposed to be included in the final impact analysis.

Exfluors' Response

For the 136 chemicals which do not have a defined ESL, Exflur followed Step 0 of the Modeling and Effects Review Applicability (MERA) guidance. Step 0 exempts from a MERA evaluation all chemical species for which there is not a current ESL listed in the Toxicity Factor Database. This database was accessed through the Texas Air Monitoring Information System (TAMIS) database via the Toxicology ESL summary and detail reports and reviewed for the 136 chemical species. Although there is no effects review initially required, the permit reviewer and APD management have the discretion to require an effects review outside of the MERA review. TCEQ Toxicology was not contacted during the initial impacts analysis to verify that this approach is acceptable. If you or TCEQ Toxicology will request an effects evaluation of the 136 chemical species at this time, Exflur will either use the default ESLs of 2 µg/m³ for the hourly emissions and 0.2 µg/m³ for the annual emissions or contact TCEQ Toxicology and obtain specific ESLs for chemicals which will not meet the default ESL criteria for the final impact analysis.

28. Please clarify exactly what sources are proposed to be located inside the building and ensure that all emission sources have been represented in the emissions calculations.

Exfluors' Response

The following table shows which emission sources are proposed to be located inside the building:

Emission Source	Location	Emission Point Number
Fluorine Generators	Inside Building 3	EP3-1
Fluorination Reactors	Inside Building 3	EP3-1
Cracking Reactors	Inside Building 3	EP3-1
Polishing Reactors	Inside Building 3	EP3-1
Distillation Units	Inside Building 3	EP3-1
Reduction Reactors 1, 2, and 3	Outside Building 3	EP3-1
Hydrolysis Reactors 1 and 2	Inside Building 3	EP3-1
Methanolysis Reactors 1, 2, and 3	Inside Building 3	EP3-1
Bromination Reactors 1 and 2	Inside Building 3	EP3-1
Extractor Tank	Inside Building 3	EP3-1
Anhydride Flask	Inside Building 3	EP3-1
Drying Flask	Inside Building 3	EP3-1
Acrylate Flask	Inside Building 3	EP3-1
Washing Reactor 1	Outside Building 3	EP3-2
Washing Reactor 2	Outside Building 3	EP3-3
Thermal Oxidizers 1 and 2	Inside Building 3	EP3-1
Evaporation Pond	Outside Building 3	EP3-4

29. **Please clarify if EPN EP3-1 is proposed to represent a shared stack, or if it is proposed to be the building vent.**

Exfluors' Response

EPN3-1 is proposed to represent a shared stack. It is not a building vent.

30. **Multiple sections of the application materials indicate that vents will be routed to the building exhaust system (EPN EP3-1). However based on several statements, it appears that sometimes specific streams are routed to this exhaust system and go to TO1 or TO2, whiles some streams are routed to this exhaust system and go to TO3 instead. Please clarify how Exflur knows what streams are to be routed to each TO, and how the streams will get there, as opposed to being mixed together. Please provide a detailed description as to how the exhaust system works and how each stream is handled accordingly.**

Exfluors' Response

The exhaust gasses from the reactor condensers, the distillation units, polishing reactors, methanolysis reactor, bromination reactor/condensers, and hydrolysis reactor/condensers feed to TO1 and TO2 after going through a series of HF adsorber columns. The vents from the stills are also vented to TO1 and TO2. The third thermal oxidizer (TO3) will not be installed at the site.

31. **The application indicates that Maintenance, Startup, and Shutdown (MSS) activities are proposed to be authorized under Permit by Rule (PBR) 106.263. The supplemental application materials state that "during MSS activities there will not be any emissions from any of the sources authorized in this permit application that exceed the emission rates during normal operation. Any MSS activity emissions will be authorized by Permit by Rule §106.263." Please be aware that if any MSS activity is not identified within this application, then it is not authorized. Plcasc update the application materials and workbook (i.e., include an EPN to represent controlled / uncontrolled MSS emissions, calculations, BACT/monitoring for MSS, etc.) to separate and identify all routine and MSS activities as appropriate.**

Exfluors' Response

As stated in the permit application, Exflur will use PBR 106.263 to authorize MSS activities at the time these MSS activities are done. MSS activities will not be authorized in this permit application.

EXFLUOR RESEARCH CORPRATION
PERMIT APPLICATION NO. 165848
ADDITONAL INFORMATION

SEPTEMBER 2, 2021

ATTACHMENT 2
PI-1 APPLICATION WORKBOOK

**Texas Commission on Environmental Quality
Form PI-1 General Application
General**

JULY 2021
REVISED SEPTEMBER 2021
PERMIT NO.: 165848
EXFLUOR RESEARCH CORPORATION

I. Applicant Information	
<p style="color: red; margin: 0;">I acknowledge that I am submitting an authorized TCEQ application workbook and any necessary attachments. Except for inputting the requested data and adjusting row height and column width, I have not changed the TCEQ application workbook in any way, including but not limited to changing formulas, formatting, content, or protections.</p>	I agree
A. Company Information	
Company or Legal Name:	Exflur Research Corporation
<p>Permits are issued to either the facility owner or operator, commonly referred to as the applicant or permit holder. List the legal name of the company, corporation, partnership, or person who is applying for the permit. We will verify the legal name with the Texas Secretary of State at (512) 463-5555 or at the link below:</p>	
<p>https://www.sos.state.tx.us</p>	
Texas Secretary of State Charter/Registration Number (if given):	0041513100
B. Company Official Contact Information: must not be a consultant	
Prefix (Mr., Ms., Dr., etc.):	Mr.
First Name:	Thomas
Last Name:	Bierschenk
Title:	Vice President
Mailing Address:	2350 Double Creek Dr.
Address Line 2:	
City:	Round Rock
State:	Texas
ZIP Code:	78664
Telephone Number:	512-310-9044
Fax Number:	512-310-9045
Email Address:	bierschenk_t@exflur.com
C. Technical Contact Information: This person must have the authority to make binding agreements and representations on behalf of the applicant and may be a consultant. Additional technical contact(s) can be provided in a cover letter.	
Prefix (Mr., Ms., Dr., etc.):	Mr.
First Name:	Thomas
Last Name:	Bierschenk
Title:	Vice President
Company or Legal Name:	Exflur Research Corporation
Mailing Address:	2350 Double Creek Dr.
Address Line 2:	
City:	Round Rock
State:	Texas
ZIP Code:	78664
Telephone Number:	512-310-9044
Fax Number:	512-310-9045
Email Address:	bierschenk_t@exflur.com
D. Assigned Numbers	
<p>The CN and RN below are assigned when a Core Data Form is initially submitted to the Central Registry. The RN is also assigned if the agency has conducted an investigation or if the agency has issued an enforcement action. If these numbers have not yet been assigned, leave these questions blank and include a Core Data Form with your application submittal. See Section VI.B. below for additional information.</p>	
Enter the CN. The CN is a unique number given to each business, governmental body, association, individual, or other entity that owns, operates, is responsible for, or is affiliated with a regulated entity.	CN602696791
Enter the RN. The RN is a unique agency assigned number given to each person, organization, place, or thing that is of environmental interest to us and where regulated activities will occur. The RN replaces existing air account numbers. The RN for portable units is assigned to the unit itself, and that same RN should be used when applying for authorization at a different location.	RN110969227

**Texas Commission on Environmental Quality
Form PI-1 General Application
General**

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EXFLUOR RESEARCH CORPORATION

II. Delinquent Fees and Penalties	
Does the applicant have unpaid delinquent fees and/or penalties owed to the TCEQ? This form will not be processed until all delinquent fees and/or penalties owed to the TCEQ or the Office of the Attorney General on behalf of the TCEQ are paid in accordance with the Delinquent Fee and Penalty Protocol. For more information regarding Delinquent Fees and Penalties, go to the TCEQ Web site at the link below: https://www.tceq.texas.gov/agency/financial/fees/delin	No

III. Permit Information
A. Permit and Action Type (multiple may be selected, leave no blanks) Additional information regarding the different NSR authorizations can be found at the link below: https://www.tceq.texas.gov/permitting/air/guidance/authorize.html Select from the drop-down the type of action being requested for each permit type. If that permit type does not apply, you MUST select "Not applicable". Provide all assigned permit numbers relevant for the project. Leave blank if the permit number has not yet been assigned.

Permit Type	Action Type Requested (do not leave blank)	Permit Number (if assigned)
Minor NSR (can be a Title V major source): <i>Not applicable, Initial, Amendment, Renewal, Renewal Certification, Renewal/Amendment, Relocation/Alteration, Change of Location, Alteration, Extension to Start of Construction</i>	Initial	165648
Special Permit: <i>Not applicable, Amendment, Renewal, Renewal Certification, Renewal/Amendment, Alteration, Extension to Start of Construction</i>	Not applicable	
De Minimis: <i>Not applicable, Initial</i>	Not applicable	
Flexible: <i>Not applicable, Initial, Amendment, Renewal, Renewal Certification, Renewal/Amendment, Alteration, Extension to Start of Construction</i>	Not applicable	
PSD: <i>Not applicable, Initial, Major Modification</i>	Not applicable	
Nonattainment: <i>Not applicable, Initial, Major Modification</i>	Not applicable	
HAP Major Source [FCAA § 112(g)]: <i>Not applicable, Initial, Major Modification</i>	Not applicable	
PAL: <i>Not applicable, Initial, Amendment, Renewal, Renewal/Amendment, Alteration</i>	Not applicable	
GHG PSD: <i>Not applicable, Initial, Major Modification, Voluntary Update</i>	Not applicable	

B. MSS Activities	
How are/will MSS activities for sources associated with this project be authorized?	Permit by Rule
List the permit number, registration number, and/or PBR number.	PBR Number 106.263

C. Consolidating NSR Permits	
Will this permit be consolidated into another NSR permit with this action?	No
Will NSR permits be consolidated into this permit with this action?	No

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EXFLUOR RESEARCH CORPORATION

D. Incorporation of Standard Permits, Standard Exemptions, and/or Permits By Rule (PBR)	
To ensure protectiveness, previously issued authorizations (standard permits, standard exemptions, or PBRs) including those for MSS, are incorporated into a permit either by consolidation or by reference. -Authorizations entirely incorporated by consolidation will be voided when the project is complete, and the sources and allowable emissions will be added to the NSR permit's MAERT. -Authorizations incorporated by reference will be referenced with the final action for this project but will not be voided. Sources will continue to be authorized in the current manner.	
At the time of renewal and/or amendment, consolidation (in some cases) may be voluntary and referencing is mandatory. More guidance regarding incorporation can be found in 30 TAC § 116.116(d)(2), 30 TAC § 116.615(3) and in this memo (link below): https://www.tceq.texas.gov/assets/public/permitting/air/memos/pbr_spc06.pdf	
Are there any standard permits, standard exemptions, or PBRs to be incorporated by reference?	No
Are there any PBR, standard exemptions, or standard permits associated to be incorporated by consolidation? Note: Emission calculations, a BACT analysis, and an impacts analysis must be attached to this application at the time of submittal for any authorization to be incorporated by consolidation.	No
E. Associated Federal Operating Permits	
Is this facility located at a site required to obtain a site operating permit (SOP) or general operating permit (GOP) ?	No

IV. Facility Location and General Information	
A. Location	
County: Enter the county where the facility is physically located.	Williamson
TCEQ Region	Region 11
County attainment status as of Sept. 23, 2019	attainment or unclassified for all pollutants
Street Address:	1100 CR 236
City: If the address is not located in a city, then enter the city or town closest to the facility, even if it is not in the same county as the facility.	Florence
ZIP Code: Include the ZIP Code of the physical facility site, not the ZIP Code of the applicant's mailing address.	76527
Site Location Description: If there is no street address, provide written driving directions to the site. Identify the location by distance and direction from well-known landmarks such as major highway intersections.	
Use USGS maps, county maps prepared by the Texas Department of Transportation, or an online software application such as Google Earth to find the latitude and longitude.	
Latitude (in degrees, minutes, and nearest second (DDD:MM:SS)) for the street address or the destination point of the driving directions. Latitude is the angular distance of a location north of the equator and will always be between 25 and 37 degrees north (N) in Texas.	30° 47' 28.3"
Longitude (in degrees, minutes, and nearest second (DDD:MM:SS)) for the street address or the destination point of the driving directions. Longitude is the angular distance of a location west of the prime meridian and will always be between 93 and 107 degrees west (W) in Texas.	97° 54' 11.52"

**Texas Commission on Environmental Quality
Form PI-1 General Application
General**

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EXFLUOR RESEARCH CORPORATION

Is this a project for a lead smelter, concrete crushing facility, and/or a hazardous waste management facility?	No
B. General Information	
Site Name:	Florence Site
Area Name: Must indicate the general type of operation, process, equipment or facility. Include numerical designations, if appropriate. Examples are Sulfuric Acid Plant and No. 5 Steam Boiler. Vague names such as Chemical Plant are not acceptable.	Specialty Chemicals Manufacturing
Are there any schools located within 3,000 feet of the site boundary?	No
C. Portable Facility	
Permanent or portable facility?	Permanent
D. Industry Type	
Principal Company Product/Business:	Specialty Chemicals Manufacturing
A list of SIC codes can be found at the link below: https://www.naics.com/sic-codes-industry-drilldown/	
Principal SIC code:	2869
NAICS codes and conversions between NAICS and SIC Codes are available at the link below: https://www.census.gov/eos/www/naics/	
Principal NAICS code:	325998
E. State Senator and Representative for this site	
This information can be found at the link below (note, the website is not compatible to Internet Explorer): https://wrm.capitol.texas.gov/	
State Senator:	Charles Schwertner
District:	Texas Senate District 5
State Representative:	Terry M. Wilson
District:	Texas House District 20
V. Project Information	
A. Description	
Provide a brief description of the project that is requested (describe the what, not the how and why). Limited to 500 characters.	Exflur Research Corporation (Exflur) is submitting this permit application to obtain authorization to build a new specialty chemicals manufacturing facility. The new facility will be located near Florence in Williamson County, Texas. Exflur will use the facility to produce a variety of perfluorocarbons.
B. Project Timing	
Authorization must be obtained for many projects before beginning construction. Construction is broadly interpreted as anything other than site clearance or site preparation. Enter the date as "Month Date, Year" (e.g. July 4, 1776).	
Projected Start of Construction:	February 1, 2022
Projected Start of Operation:	December 1, 2022
C. Enforcement Projects	
Is this application in response to, or related to, an agency investigation, notice of violation, or enforcement action?	No
D. Operating Schedule	
Will sources in this project be authorized to operate 8760 hours per year?	Yes

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EXFLUOR RESEARCH CORPORATION

VI. Application Materials	
All representations regarding construction plans and operation procedures contained in the permit application shall be conditions upon which the permit is issued. (30 TAC § 116.116)	
A. Confidential Application Materials	
Is confidential information submitted with this application?	Yes
If yes, is each confidential page marked "CONFIDENTIAL" in large red letters?	Yes
THSC §382.041 requires us not to disclose any information related to manufacturing processes that is marked Confidential. Mark any information related to secret or proprietary processes or methods of manufacture Confidential if you do not want this information in the public file. All confidential information should be separated from the application and submitted as a separate file. Additional information regarding confidential information can be found at the link below: https://www.tceq.texas.gov/permitting/air/confidential.html	
B. Is the Core Data Form (Form 10400) attached (link to the form below)?	N/A
C. Is a current area map attached?	
Is the area map a current map with a true north arrow, an accurate graduated scale, the entire plant property, the location of the property relative to prominent geographical features including, but not limited to, highways, roads, streams, and significant landmarks such as buildings, residences, schools, parks, hospitals, day care centers, and churches?	Yes
Does the map show a 3,000-foot radius from the property boundary?	Yes
D. Is a plot plan attached?	
Does your plot plan clearly show a north arrow, an accurate scale, all property lines, all emission points, buildings, tanks, process vessels, other process equipment, and two bench mark locations?	Yes
Does your plot plan identify all emission points on the affected property, including all emission points authorized by other air authorizations, construction permits, PBRs, special permits, and standard permits?	Yes
Did you include a table of emission points indicating the authorization type and authorization identifier, such as a permit number, registration number, or rule citation under which each emission point is currently authorized?	Yes
E. Is a process flow diagram attached?	
Is the process flow diagram sufficiently descriptive so the permit reviewer can determine the raw materials to be used in the process; all major processing steps and major equipment items; individual emission points associated with each process step; the location and identification of all emission abatement devices; and the location and identification of all waste streams (including wastewater streams that may have associated air emissions)?	Yes
F. Is a process description attached?	
Does the process description emphasize where the emissions are generated, why the emissions must be generated, what air pollution controls are used (including process design features that minimize emissions), and where the emissions enter the atmosphere?	Yes
Does the process description also explain how the facility or facilities will be operating when the maximum possible emissions are produced?	Yes
G. Is a detailed list of requested actions included in the application? This list can be included in the project description.	Yes
H. Are detailed calculations attached? Calculations must be provided for each source with new or changing emission rates. For example, a new source, changing emission factors, decreasing emissions, consolidated sources, etc. Calculations do not need to be submitted for sources without any proposed emission rate changes. Note: the preferred format is an electronic workbook (such as Excel) with all formulas viewable for review.	Yes
Are emission rates and associated calculations for planned MSS facilities and related activities attached?	N/A

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Form PI-1 General Application
General

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EXFLUOR RESEARCH CORPORATION

I. Is a material balance (Table 2, Form 10155) attached?	Yes
Table 2 (Form 10155), entitled Material Balance: A material balance representation may be required for all applications to confirm technical emissions information. Typically this is required for refining and chemical manufacturing processes involving reactions, separations, and blending. It may also be requested by the permit reviewer for other applications. Table 2 should represent the total material balance; that is, all streams into the system and all streams out. Additional sheets may be attached if necessary. Complex material balances may be presented on spreadsheets or indicated using process flow diagrams. All materials in the process should be addressed whether or not they directly result in the emission of an air contaminant. All production rates must be based on maximum operating conditions.	
J. Is a list of MSS activities attached?	N/A
K. Is a discussion of state regulatory requirements attached, addressing 30 TAC Chapters 101, 111, 112, 113, 115, and 117?	Yes
For all applicable chapters, does the discussion include how the facility will comply with the requirements of the chapter?	Yes
For all not applicable chapters, does the discussion include why the chapter is not applicable?	Yes
L. Are all other required tables, calculations, and descriptions attached?	Yes

VII. Signature	
The owner or operator of the facility must apply for authority to construct. The appropriate company official (owner, plant manager, president, vice president, or environmental director) must sign all copies of the application. The applicant's consultant cannot sign the application. Important Note: Unless submitting through STEERS, signatures must be original in ink, not reproduced by photocopy, fax, or other means, and must be received before any permit is issued.	
The signature below confirms that I have knowledge of the facts included in this application and that these facts are true and correct to the best of my knowledge and belief. I further state that to the best of my knowledge and belief, the project for which application is made will not in any way violate any provision of the Texas Water Code (TWC), Chapter 7; the Texas Health and Safety Code, Chapter 382; the Texas Clean Air Act (TCAA); the air quality rules of the Texas Commission on Environmental Quality; or any local governmental ordinance or resolution enacted pursuant to the TCAA. I further state that I understand my signature indicates that this application meets all applicable nonattainment, prevention of significant deterioration, or major source of hazardous air pollutant permitting requirements. The signature further signifies awareness that intentionally or knowingly making or causing to be made false material statements or representations in the application is a criminal offense subject to criminal penalties.	
Name:	Thomas Bierschenk
Signature:	
<i>Original signature is required unless submitted through STEERS.</i>	
Date:	

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Technical

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E. Concrete Batch Plants	
Is this a project for a concrete batch plant?	No

VIII. Federal Regulatory Questions

Indicate if any of the following requirements apply to the proposed facility. Note that some federal regulations apply to minor sources. Enter all applicable Subparts.

A. Title 40 CFR Part 60	
Do NSPS subpart(s) apply to a facility in this application?	No
B. Title 40 CFR Part 61	
Do NESHAP subpart(s) apply to a facility in this application?	No
C. Title 40 CFR Part 63	
Do MACT subpart(s) apply to a facility in this application?	No

IX. Emissions Review

A. Impacts Analysis

Any change that may result in an increase in off-property concentrations of air contaminants requires an air quality impacts demonstration, which may include a qualitative analysis, the MERA, and/or modeling. Information regarding the air quality impacts demonstration must be provided with the application and show compliance with all state and federal requirements. Detailed requirements for the information necessary to make the demonstration are listed on the Impacts sheet.

Are there any increases in short-term and/or long-term allowable emission rates?	Yes
Can all the emission rate increases be attributed to speciation of currently authorized PM emissions and/or revisions of AP-42 or TCEQ guidance?	No
Are there any new or modified control devices or emission sources?	Yes
Are there any changes to emission point discharge parameters? Consider all parameters on the Stack Parameters sheet, including location.	No
Will any PBR registrations, standard permit, or standard exemptions be incorporated by consolidation?	No
Does this project require an impacts analysis?	Yes
Will off property impacts for any of the pollutants require Tier III Toxicology Effects Evaluation as defined in Appendix D of MERA?	No

B. Disaster Review

If the proposed facility will handle sufficient quantities of certain chemicals which, if released accidentally, would cause off-property impacts that could be immediately dangerous to life and health, a disaster review analysis may be required as part of the application. Contact the appropriate NSR permitting section for assistance at (512) 239-1250. Additional Guidance can be found at the link below:

<https://www.tceq.texas.gov/assets/public/permitting/air/Guidance/NewSourceReview/disrev-factsheet.pdf>

Does this application involve any air contaminants for which a disaster review is required?	Yes
If Yes, list which air contaminants require a disaster review.	Hydrogen Fluoride

C. Air Pollutant Watch List

Certain areas of the state have concentrations of specific pollutants that are of concern. The TCEQ has designated these portions of the state as watch list areas. Location of a facility in a watch list area could result in additional restrictions on emissions of the affected air pollutant(s) or additional permit requirements. The location of the areas and pollutants of interest can be found at the link below:

<https://www.tceq.texas.gov/toxicology/apwl/apwl.html>

Is the proposed facility located in a watch list area?	No
--	----

D. Mass Emissions Cap and Trade

Is this facility located at a site within the Houston/Galveston nonattainment area (Brazoria, Chambers, Fort Bend, Galveston, Harris, Liberty, Montgomery, and Waller Counties)?	No
--	----

X. Additional Requirements

A. Bulk Fuel Terminals

Is this project for a bulk fuel terminal?	No
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B. Plant Fuel Gas Facilities

Does this site utilize plant fuel gas?	No
--	----

Texas Commission on Environmental Quality
 Form PI-1 General Application
 Unit Types - Emission Rates

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Action Requested (only 1 action per FIN)	Include these emissions in annual (tpy) summary?	Facility ID Number (FIN)	Emission Point Number (EPN)	Source Name	Pollutant	Current Short-Term (lb/hr)	Current Long-Term (tpy)	Consolidated Current Short-Term (lb/hr)	Consolidated Current Long-Term (tpy)
New/Modified	Yes	Misc. Vents	EP3-1	Exhaust Gas Vent System	VOC				
					HF				
					F2				
					Br2				
					HCl				
					HBr				
					Carbon Compounds excluding VOC & CO				
New/Modified	Yes	TO1-2	EP3-1	Thermal Oxidizers 1 and 2	NOx				
					CO				
					PM				
					PM10				
					PM2.5				
New/Modified	Yes	EP3-2	EP3-2	Washing Reactor 1	VOC				
New/Modified	Yes	EP3-3	EP3-3	Washing Reactor 2	VOC				
New/Modified	Yes	EP3-4	EP3-4	Evaporation Pond	VOC				
New/Modified	Yes	FUG3-1	FUG3-1	Building 3 Fugitives	VOC				
					HF				
					F2				
					Br2				
					Carbon Compounds excluding VOC & CO				
New/Modified	Yes	FUG3-2	FUG3-2	Reduction Reactor 1 Fugitives	H2				
					VOC				
New/Modified	Yes	FUG3-3	FUG3-3	Reduction Reactor 2 Fugitives	HCl				
					VOC				
New/Modified	Yes	FUG3-4	FUG3-4	Reduction Reactor 3 Fugitives	HCl				
					VOC				
					HCl				

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 Unit Types - Emission Rates

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Facility ID Number (FIN)	Proposed Short-Term (lb/hr)	Proposed Long-Term (tpy)	Short-Term Difference (lb/hr)	Long-Term Difference (tpy)	Unit Type (Used for reviewing BACT and Monitoring Requirements)	Unit Type Notes (only if "other" unit type in Column O)
Misc. Vents	0.16	0.14	0.16	0.14	Process Vent	
	<0.01	0.03	0.01	0.03		
	<0.01	<0.01	0.01	0.01		
	<0.01	<0.01	0.01	0.01		
	0.023	0.09	0.023	0.09		
	<0.01	<0.01	0.01	0.01		
	1.053	4.404	1.053	4.404		
TO1-2	0.03	0.13	0.03	0.13	Control: Oxidizer: Thermal	
	0.04	0.18	0.04	0.18		
	<0.01	0.02	0.01	0.02		
	<0.01	0.02	0.01	0.02		
	<0.01	0.02	0.01	0.02		
EP3-2	0.733	0.2	0.733	0.2	Other	
EP3-3	0.984	0.27	0.984	0.27	Other	
EP3-4	0	0	0	0	Wastewater Facilities	
FUG3-1	1.75	7.67	1.75	7.67	Fugitives: Piping and Equipment Leak	
	0.13	0.55	0.13	0.55		
	0.1	0.45	0.1	0.45		
	0.14	0.6	0.14	0.6		
	1.65	7.21	1.65	7.21		
	0.06	0.25	0.06	0.25		
FUG3-2	0.03	0.13	0.03	0.13	Fugitives: Piping and Equipment Leak	
	<0.01	0.033	0.01	0.033		
FUG3-3	0.03	0.13	0.03	0.13	Fugitives: Piping and Equipment Leak	
	<0.01	0.02	0.01	0.02		
FUG3-4	0.06	0.25	0.06	0.25	Fugitives: Piping and Equipment Leak	
	<0.01	0.014	0.01	0.014		

Emission Point Discharge Parameters												
EPN	Included in EMEW?	UTM Coordinates Zone	East (Meters)	North (Meters)	Building Height (ft)	Height Above Ground (ft)	Stack Exit Diameter (ft)	Velocity (FPS)	Temperature (°F)	Fugitives - Length (ft)	Fugitives - Width (ft)	Fugitives - Axis Degrees
EP3-1	Yes											
EP3-2	Yes											
EP3-3	Yes											
EP3-4	Yes											
FUG3-1	Yes											
FUG3-2	Yes											
FUG3-3	Yes											
FUG3-4	Yes											

I. Public Notice Applicability						
A. Application Type						
Is this an application for an initial permit?						Yes
B. Project Increases and Public Notice Thresholds (for Initial and Amendment Projects)						
Pollutant			Proposed Long-Term (tpy)			
VOC			8.79			
PM			0.02			
PM ₁₀			0.02			
PM _{2.5}			0.02			
NO _x			0.13			
CO			0.18			
SO ₂			0.00			
Pb			0.00			
HF			0.58			
F2			0.46			
Br2			0.61			
HCl			0.157			
HBr			0.01			
Carbon Compounds ex			11.614			
H2			0.25			
* Notice is required for PM, PM10, and PM2.5 if one of these pollutants is above the threshold.						
** Notice of a GHG action is determined by action type. Initial and major modification always require notice. Voluntary updates require a consolidated notice if there is a change to BACT. Project emission increases of CO2e (CO2 equivalent) are not relevant for determining public notice of GHG permit actions.						
D. Is public notice required for this project as represented in this PI-1?						Yes
If no, proceed to Section III Small Business Classification. Note: public notice applicability for this project may change throughout the technical review.						
E. Are any HAPs to be authorized/re-authorized with this project? The category "HAPs" must be specifically listed in the public notice if the project authorizes (reauthorizes for renewals) any HAP pollutants.						Yes

II. Public Notice Information

Complete this section if public notice is required (determined in the above section) or if you are not sure if public notice is required.

A. Contact Information

Enter the contact information for the **person responsible for publishing**. This is a designated representative who is responsible for ensuring public notice is properly published in the appropriate newspaper and signs are posted at the facility site. This person will be contacted directly when the TCEQ is ready to authorize public notice for the application.

Prefix (Mr., Ms., Dr., etc.):	Mr.
First Name:	Luke
Last Name:	Bernhard
Title:	EHS Manager
Company Name:	Exflur Research Corporation
Mailing Address:	2350 Double Creek Dr.
Address Line 2:	
City:	Round Rock
State:	Texas
ZIP Code:	78664
Telephone Number:	512.310.9044
Fax Number:	512.310.9045
Email Address:	luke.bernhard@exflur.com

Enter the contact information for the **Technical Contact**. This is the designated representative who will be listed in the public notice as a contact for additional information.

Prefix (Mr., Ms., Dr., etc.):	Mr.
First Name:	Thomas
Last Name:	Bierschenk
Title:	Vice President
Company Name:	Exflur Research Corporation
Mailing Address:	2350 Double Creek Dr.
Address Line 2:	
City:	Round Rock
State:	Texas
ZIP Code:	78664
Telephone Number:	512.310.9044
Fax Number:	512.310.9045
Email Address:	bierschenk_t@exflur.com

B. Public place

Place a copy of the full application (including the entire completed PI-1 and all attachments) at a public place in the county where the facilities are or will be located. You must state where in the county the application will be available for public review and comment. The location must be a public place and described in the notice. A public place is a location which is owned and operated by public funds (such as libraries, county courthouses, city halls) and cannot be a commercial enterprise. You are required to pre-arrange this availability with the public place indicated below. The application must remain available from the first day of publication through the designated comment period.

If this is an application for a PSD, nonattainment, or FCAA §112(g) permit, the public place must have internet access available for the public as required in 30 TAC § 39.411(f)(3).

If the application is submitted to the agency with information marked as Confidential, you are required to indicate which specific portions of the application are not being made available to the public. These portions of the application must be accompanied with the following statement: **Any request for portions of this application that are marked as confidential must be submitted in writing, pursuant to the Public Information Act, to the TCEQ Public Information Coordinator, MC 197, P.O. Box 13087, Austin, Texas 78711-3087.**

Name of Public Place:	Eula Hunt Beck Florence Public Library	
Physical Address:	206 East Main Street	
Address Line 2:		
City:	Florence	
ZIP Code:	76527	
County:	Williamson	
Has the public place granted authorization to place the application for public viewing and copying?	Yes	

C. Alternate Language Publication

In some cases, public notice in an alternate language is required. If an elementary or middle school nearest to the facility is in a school district required by the Texas Education Code to have a bilingual program, a bilingual notice will be required. If there is no bilingual program required in the school nearest the facility, but children who would normally attend those schools are eligible to attend bilingual programs elsewhere in the school district, the bilingual notice will also be required. If it is determined that alternate language notice is required, you are responsible for ensuring that the publication in the alternate language is complete and accurate in that language.

Is a bilingual program required by the Texas Education Code in the School District?	Yes
Are the children who attend either the elementary school or the middle school closest to your facility eligible to be enrolled in a bilingual program provided by the district?	Yes
If yes to either question above, list which language(s) are required by the bilingual program. Enter the second required language, if applicable. Enter the third required language, if applicable. Enter the fourth required language, if applicable.	Spanish

I. County Classification	
Does the project require retrospective review?	No
County (completed for you from your response on the General sheet)	Williamson
This project will be located in an area that is in attainment for ozone as of Sept. 23, 2019. Select from the drop-down list to the right if you would like the project to be reviewed under a different classification.	
Determination:	This project will be located in an area that is in attainment or unclassified for all pollutants. Nonattainment review is not required.

II. PSD and GHG PSD Applicability Summary			
Is netting required for the PSD analysis for this project?			No
Pollutant	Project Increase	Threshold	PSD Review Required?
CO	0.18	100	No
NO _x	0.13	100	No
PM	0.02	25	No
PM ₁₀	0.02	15	No
PM _{2.5}	0.02	10	No
SO ₂			
Ozone (as VOC)	8.79	100	No
Ozone (as NO _x)	0.13	100	No
Pb			
H ₂ S			
TRS			
Reduced sulfur compounds (including H ₂ S)			
H ₂ SO ₄			
Fluoride (excluding HF)	20.18	100	No
CO ₂ e			

Texas Commission on Environmental Quality
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Fees

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EXFLUOR RESEARCH CORPORATION

I. Expedited Permitting Request	
Are you requesting to expedite this project?	Yes
Does the purpose of the application associated with this request to expedite benefit the economy of this state or an area of this state? If no, this project does not qualify for expedited permitting.	Yes
Surcharge amount due	\$ 10,000.00
Surcharge amount paid	\$ 10,000.00
Enter the check, money order, ePay Voucher, or other transaction number.	
You must request expedited processing and pay the fee through STEERS when submitting your ePermit application.	

II. General Information - Non-Renewal	
Is this project for new facilities controlled and operated directly by the federal government? (30 TAC § 116.141(b)(1) and 30 TAC § 116.163(a))	No
A fee of \$75,000 shall be required if no estimate of capital project cost is included with the permit application. (30 TAC § 116.141(d)) Select "yes" here to use this option.	No
Select Application Type	Minor Application

III. Direct Costs - Non-Renewal	
Type of Cost	Amount
Process and control equipment not previously owned by the applicant and not currently authorized under this chapter.	\$200,000.00
Auxiliary equipment, including exhaust hoods, ducting, fans, pumps, piping, conveyors, stacks, storage tanks, waste disposal facilities, and air pollution control equipment specifically needed to meet permit and regulation requirements.	\$200,000.00
Freight charges.	\$12,000.00
Site preparation, including demolition, construction of fences, outdoor lighting, road, and parking areas.	\$50,000.00
Installation, including foundations, erection of supporting structures, enclosures or weather protection, insulation and painting, utilities and connections, process integration, and process control equipment.	\$50,000.00
Auxiliary buildings, including materials storage, employee facilities, and changes to existing structures.	\$1,500,000.00
Ambient air monitoring network.	\$10,000.00
Sub-Total:	\$2,022,000.00

IV. Indirect Costs - Non-Renewal	
Type of Cost	Amount
Final engineering design and supervision, and administrative overhead.	\$100,000.00
Construction expense, including construction liaison, securing local building permits, insurance, temporary construction facilities, and construction clean-up.	\$40,000.00
Contractor's fee and overhead.	\$50,000.00
Sub-Total:	\$190,000.00

V. Calculations - Non-Renewal

For GHG permits: A single PSD fee (calculated on the capital cost of the project per 30 TAC § 116.163) will be required for all of the associated permitting actions for a GHG PSD project. Other NSR permit fees related to the project that have already been remitted to the TCEQ can be subtracted when determining the appropriate fee to submit with the GHG PSD application. Identify these other fees in the GHG PSD permit application.

In signing the "General" sheet with this fee worksheet attached, I certify that the total estimated capital cost of the project as defined in 30 TAC §116.141 is equal to or less than the above figure. I further state that I have read and understand Texas Water Code § 7.179, which defines Criminal Offenses for certain violations, including intentionally or knowingly making, or causing to be made, false material statements or representations.

Estimated Capital Cost	Minor Application Fee	
Less than \$300,000	\$900 (minimum fee)	
\$300,000 - \$7,500,000	N/A	
\$300,000 - \$25,000,000	0.30% of capital cost	
Greater than \$7,500,000	N/A	
Greater than \$25,000,000	\$75,000 (maximum fee)	

Your estimated capital cost:	\$2,212,000.00	x 0.30% =	
Permit Application Fee:			\$6,636.00

VII. Total Permit Fees

Note: fees can be paid together with one payment or as two separate payments.

Non-Renewal Fee	\$6,636.00
Total	\$6,636.00

VIII. Payment Information

A. Payment One (required)

Was the fee paid online?	Yes
Enter the fee amount:	\$ 16,636.00
Enter the check, money order, ePay Voucher, or other transaction number (enter "STEERS" if submitting and paying through STEERS):	
Enter the Company name as it appears on the check:	
C. Total Paid	\$16,636.00

IX. Professional Engineer Seal Requirement

Is the estimated capital cost of the project above \$2 million?	Yes
Is this project subject to an exemption contained in the Texas Engineering Practice Act (TEPA)? (30 TAC § 116.110(f))	No
Is the application required to be submitted under the seal of a Texas licensed P.E.? Note: an electronic PE seal is acceptable.	Yes

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Impacts**

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EXFLUOR RESEARCH CORPORATION

Pollutant	Does this pollutant require PSD review?	How will you demonstrate that this project meets all applicable requirements?	Notes
VOC	No	MERA steps 0-2 AND Modeling (screen or refined)	Attach both an "Electronic Modeling Evaluation Workbook" (EMEW) AND a detailed description of which MERA step was met. Include speciated emission rates with the total VOC and/or PM species corresponding to the short-term and long-term differences represented on the Unit Types-Emission Rates sheet.
HF	No	MERA steps 0-2 AND Modeling (screen or refined)	Attach both an "Electronic Modeling Evaluation Workbook" (EMEW) AND a detailed description of which MERA step was met. Include speciated emission rates with the total VOC and/or PM species corresponding to the short-term and long-term differences represented on the Unit Types-Emission Rates sheet.
F2	No	MERA steps 0-2 AND Modeling (screen or refined)	Attach both an "Electronic Modeling Evaluation Workbook" (EMEW) AND a detailed description of which MERA step was met. Include speciated emission rates with the total VOC and/or PM species corresponding to the short-term and long-term differences represented on the Unit Types-Emission Rates sheet.
Br2	No	MERA steps 0-2 AND Modeling (screen or refined)	Attach both an "Electronic Modeling Evaluation Workbook" (EMEW) AND a detailed description of which MERA step was met. Include speciated emission rates with the total VOC and/or PM species corresponding to the short-term and long-term differences represented on the Unit Types-Emission Rates sheet.
HCl	No	MERA steps 0-2 AND Modeling (screen or refined)	Attach both an "Electronic Modeling Evaluation Workbook" (EMEW) AND a detailed description of which MERA step was met. Include speciated emission rates with the total VOC and/or PM species corresponding to the short-term and long-term differences represented on the Unit Types-Emission Rates sheet.
HBr	No	MERA steps 0-2 AND Modeling (screen or refined)	Attach both an "Electronic Modeling Evaluation Workbook" (EMEW) AND a detailed description of which MERA step was met. Include speciated emission rates with the total VOC and/or PM species corresponding to the short-term and long-term differences represented on the Unit Types-Emission Rates sheet.
Carbon Compounds excluding VOC & CO	No	MERA steps 0-2 AND Modeling (screen or refined)	Attach both an "Electronic Modeling Evaluation Workbook" (EMEW) AND a detailed description of which MERA step was met. Include speciated emission rates with the total VOC and/or PM species corresponding to the short-term and long-term differences represented on the Unit Types-Emission Rates sheet.

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Impacts**

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Pollutant	Does this pollutant require PSD review?	How will you demonstrate that this project meets all applicable requirements?	Notes
NOx	No	Modeling: screen or refined	Attach a completed "Electronic Modeling Evaluation Workbook" (EMEW).
CO	No	Modeling: screen or refined	Attach a completed "Electronic Modeling Evaluation Workbook" (EMEW).
PM	No	Not applicable	This pollutant is not a part of this project or does not require an impacts analysis.
PM10	No	Modeling: screen or refined	Attach a completed "Electronic Modeling Evaluation Workbook" (EMEW).
PM2.5	No	Modeling: screen or refined	Attach a completed "Electronic Modeling Evaluation Workbook" (EMEW).
H2	No	Not applicable	This pollutant is not a part of this project or does not require an impacts analysis.

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Form PI-1 General Application
BACT

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EXFLUOR RESEARCH CORPORATION

Action Requested	FlNs	Unit Type	Pollutant	Current Tier BACT	Confirm	Additional Notes
New/Modified	Misc. Vents	Process Vent	VOC	Non-halogenated VOCs: flare, any oxidizer, adsorber, absorber/scrubber, etc. Specify technique. Must meet that control device's approved efficiency. Halogenated VOC: Thermal oxidation followed by absorber/scrubber carbon adsorption. Specify technique. Must meet that control device's approved efficiency. See additional notes:	Yes	The halogenated and non-halogenated VOC emissions are controlled by thermal oxidizers followed by scrubbers. The overall control efficiency of each system is 99.9%. The HF emissions are controlled by scrubbers. The control efficiency is at least 99.9% which is BACT. The F2 emissions are controlled by thermal oxidizers followed by scrubbers. The overall control efficiency is at least 99.9% which is BACT. The Br2 emissions are controlled by thermal oxidizers followed by scrubbers. The overall control efficiency is at least 99.9% which is BACT.
			HF	See additional notes:		
			F2	See additional notes:		
			Br2	See Additional Notes:		
			HCl	See additional notes:		The HCl emissions are controlled by scrubbers. The overall control efficiency is at least 99.9% which is BACT.
			HBr	See additional notes:		The HBr emissions are controlled by scrubbers. The overall control efficiency is at least 99.9% which is BACT.
			Carbon Compounds excluding VOC & CO	See additional notes:		The emissions of halogenated and non-halogenated carbon compounds that are not VOC or CO are controlled by thermal oxidizers followed by scrubbers. The overall control efficiency of each system is 99.9% which is BACT.
			MSS	Same as normal operation BACT requirements. Low NOx burners (0.06 lb/MMBtu or less). Specify details.		MSS emissions are not authorized in this permit. The NOx emissions are controlled using burners that meet the Tier I BACT NOx emission factor requirement. NOx emissions are less than 0.2 ton/yr. Therefore, the cost of any additional control would not be economically reasonable.
New/Modified	TO1-2	Control: Oxidizer: Thermal	NOx	See Additional Notes:	Yes	The CO emissions are controlled by operating at sufficiently high temperature to produce low CO emission rates. The CO emission rate is less than 0.3 tpy. Therefore, the cost of any additional controls to reduce CO emissions would not be economically reasonable.
			CO	The emission reduction techniques for PM10 and PM2.5 will follow the technique for PM. See Additional Notes:	Yes	The thermal oxidizers will utilize good combustion controls that limit PM/PM10/PM2.5 emissions as BACT1.
			PM	Same as normal operation BACT requirements.	Yes	MSS emissions are not authorized in this permit. The halogenated and non-halogenated VOC emissions from the source are less than 0.2 tpy. No further control is proposed because there are no control devices that could be installed on the washing reactor that would meet the BACT requirement for being economically reasonable.
			MSS	See additional notes:		
New/Modified	EP3-2	Other	VOC	See additional notes:		MSS emissions are not authorized in this permit. The halogenated and non-halogenated VOC emissions from the source are less than 0.2 tpy. No further control is proposed because there are no control devices that could be installed on the washing reactor that would meet the BACT requirement for being economically reasonable.
			MSS	See additional notes:		
New/Modified	EP3-3	Other	VOC	See additional notes:		MSS emissions are not authorized in this permit. VOC emissions are not expected from the source. No control is proposed because there are no emissions associated with this EPN.
			MSS	Applicable for organics and inorganics. Uncontrolled site-wide wastewater emissions < 5 tpy VOC: Piped and covered conveyance to storage or biological treatment.		
New/Modified	EP3-4	Wastewater Facilities	VOC	Same as normal operation BACT requirements.		MSS emissions are not authorized in this permit.
			MSS			

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Action Requested	FINs	Unit Type	Pollutant	Current Tier / BACT	Confirm	Additional Notes
New/Modified	FUG3-1	Fugitives: Piping and Equipment Leak	VOC	Specify which is applicable: 1. Uncontrolled VOC emissions < 10 tpy: none 2. 10 tpy < uncontrolled VOC emissions < 25 tpy: 28M leak detection and repair program, 75% credit for 28M. 3. Uncontrolled VOC emissions > 25 tpy: 28VHP leak detection and repair program, 97% credit for valves, 85% for pumps and compressors. 4. VOC vp < 0.002 psia: no inspection required, no fugitive emissions expected. For emissions of approved odorous compounds (chlorine, ammonia, hydrogen sulfide, hydrogen cyanide and mercaptans only): AVO inspection twice per shift. Appropriate credit for AVO program. See additional notes:	Yes	1. Uncontrolled VOC emissions < 10 tpy. Leaks from some streams that contain VOC also contain HF. TCEQ's APDG 6422 indicates the 28AVO program applies to HF. The 28AVO program will be used to monitor fugitive components on those streams and that monitoring will result in detection of some VOC leaks. AVO inspections will be done once per shift including weekends and holidays. TCEQ's APDG 6422 indicates the 28AVO program applies to HF. The 28AVO program will be used to monitor fugitive components where HF would be present in the leaked material. AVO inspections will be done once per shift including weekends and holidays.
			HF	See additional notes:		Streams that contain F2 also contain HF. Exflur will use the 28AVO program to monitor the fugitive components that would have HF in the leaked material. As a result, the components on streams that contain F2 will be monitored using the 28 AVO program. AVO inspections will be done once per shift including weekends and holidays.
			F2	See additional notes:		Bromine (Br2) has published odor thresholds in a range that is very low, lower than HF in some cases. Additionally, Br2 is used in the same building where HF is used. Therefore, Exflur expects any Br2 leaks to be detected during weekly walk-throughs of the building. Uncontrolled Br2 fugitive emissions are less than 0.6 tpy.
			Br2	See additional notes:		Leaks from some streams that contain carbon compounds other than VOC and CO would also contain HF. Exflur will use the 28AVO program to monitor those fugitive components. AVO inspections will be done once per shift including weekends and holidays. Uncontrolled fugitive emissions of carbon compounds other than VOC & CO are < 10 tpy.
			Carbon Compounds excluding VOC & CO	See additional notes:		Streams that contain H2 also contain HF. Exflur will use the 28AVO program to monitor the fugitive components in HF service. AVO inspections will be done once per shift including weekends and holidays.
			H2	See additional notes:		Streams that contain H2 also contain HF. Exflur will use the 28AVO program to monitor the fugitive components in HF service. AVO inspections will be done once per shift including weekends and holidays.
			MSS	Same as normal operation BACT requirements. Specify which is applicable: 1. Uncontrolled VOC emissions < 10 tpy: none 2. 10 tpy < uncontrolled VOC emissions < 25 tpy: 28M leak detection and repair program, 75% credit for 28M. 3. Uncontrolled VOC emissions > 25 tpy: 28VHP leak detection and repair program, 97% credit for valves, 85% for pumps and compressors. 4. VOC vp < 0.002 psia: no inspection required, no fugitive emissions expected. For emissions of approved odorous compounds (chlorine, ammonia, hydrogen sulfide, hydrogen cyanide and mercaptans only): AVO inspection twice per shift. Appropriate credit for AVO program.		MSS emissions are not authorized in this permit. 1. Uncontrolled VOC emissions < 10 tpy. Leaks from some streams that contain VOC also contain HF. TCEQ's APDG 6422 indicates the 28AVO program applies to HF. The 28AVO program will be used to monitor fugitive components on those streams and that monitoring will result in detection of some VOC leaks. AVO inspections will be done once per shift including weekends and holidays.
New/Modified	FUG3-2	Fugitives: Piping and Equipment Leak	VOC	Specify which is applicable: 1. Uncontrolled VOC emissions < 10 tpy: none 2. 10 tpy < uncontrolled VOC emissions < 25 tpy: 28M leak detection and repair program, 75% credit for 28M. 3. Uncontrolled VOC emissions > 25 tpy: 28VHP leak detection and repair program, 97% credit for valves, 85% for pumps and compressors. 4. VOC vp < 0.002 psia: no inspection required, no fugitive emissions expected. For emissions of approved odorous compounds (chlorine, ammonia, hydrogen sulfide, hydrogen cyanide and mercaptans only): AVO inspection twice per shift. Appropriate credit for AVO program.	Yes	1. Uncontrolled VOC emissions < 10 tpy. Leaks from some streams that contain VOC also contain HF. TCEQ's APDG 6422 indicates the 28AVO program applies to HF. The 28AVO program will be used to monitor fugitive components on those streams and that monitoring will result in detection of some VOC leaks. AVO inspections will be done once per shift including weekends and holidays.

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Action Requested	Fls	Unit Type	Pollutant	Current Tier BACT	Confirm	Additional Notes
			HCl MSS	AVO inspection twice per shift. Appropriate credit for AVO program. Same as normal operation BACT requirements. Specify which is applicable: 1. Uncontrolled VOC emissions < 10 tpy: none 2. 10 tpy < uncontrolled VOC emissions < 25 tpy: 28M leak detection and repair program, 75% credit for 28M. 3. Uncontrolled VOC emissions > 25 tpy: 28VHP leak detection and repair program, 97% credit for valves, 85% for pumps and compressors. 4. VOC vp < 0.002 psia: no inspection required, no fugitive emissions expected. For emissions of approved odorous compounds (chlorine, ammonia, hydrogen sulfide, hydrogen cyanide and mercaptans only): AVO inspection twice per shift. Appropriate credit for AVO program.	Yes	AVO inspections will be conducted once per daily shift including weekends and holidays. No reduction credit for HCl fugitives is claimed because TCEQ's APDG 6422 guidance for the 28AVO program does not list HCl as an approved chemical. EPN FUG3-2 HCl emissions are less than 0.04 tpy without applying any control credit. Site HCl uncontrolled fugitive emissions are less than 0.1 tpy. MSS emissions are not authorized in this permit. 1. Site uncontrolled VOC fugitive emissions are less than 10 tpy. EPN FUG3-2 uncontrolled VOC fugitive emissions are less than 0.2 tpy.
New/Modified	FUG3-3	Fugitives: Piping and Equipment Leak	VOC	AVO inspection twice per shift. Appropriate credit for AVO program.	Yes	AVO inspections will be conducted once per daily shift including weekends and holidays. No reduction credit for HCl fugitives is claimed because TCEQ's APDG 6422 guidance for the 28AVO program does not list HCl as an approved chemical. EPN FUG3-2 HCl emissions are less than 0.04 tpy without applying any control credit. Site HCl uncontrolled fugitive emissions are less than 0.1 tpy.
			HCl MSS	Same as normal operation BACT requirements. Specify which is applicable: 1. Uncontrolled VOC emissions < 10 tpy: none 2. 10 tpy < uncontrolled VOC emissions < 25 tpy: 28M leak detection and repair program, 75% credit for 28M. 3. Uncontrolled VOC emissions > 25 tpy: 28VHP leak detection and repair program, 97% credit for valves, 85% for pumps and compressors. 4. VOC vp < 0.002 psia: no inspection required, no fugitive emissions expected. For emissions of approved odorous compounds (chlorine, ammonia, hydrogen sulfide, hydrogen cyanide and mercaptans only): AVO inspection twice per shift. Appropriate credit for AVO program.	Yes	MSS emissions are not authorized in this permit. 1. Site uncontrolled VOC fugitive emissions are less than 10 tpy. EPN FUG3-3 uncontrolled VOC fugitive emissions are less than 0.2 tpy.
New/Modified	FUG3-4	Fugitives: Piping and Equipment Leak	VOC	AVO inspection twice per shift. Appropriate credit for AVO program.	Yes	AVO inspections will be conducted once per daily shift including weekends and holidays. No reduction credit for HCl fugitives is claimed because TCEQ's APDG 6422 guidance for the 28AVO program does not list HCl as an approved chemical. EPN FUG3-3 HCl emissions are less than 0.02 tpy without applying any control credit. Site HCl uncontrolled fugitive emissions are less than 0.1 tpy.

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 Monitoring

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FIN	Unit Type	Pollutant	Minimum Monitoring Requirements	Confirm	Additional Notes for Monitoring
Misc. Vents	Process Vent	VOC	Production rate or flow as appropriate Monitoring consistent with Control Device	Yes	Exflur will monitor the scrubbing liquid flow rate of the Thermal Oxidizer/Scrubber and the combustion temperatures of the thermal oxidizers.
		HF	See additional notes:		Exflur will monitor the scrubbing liquid flow rate of the Thermal Oxidizer/Scrubber and the combustion temperatures of the thermal oxidizers.
		F2	See additional notes:		Exflur will monitor the scrubbing liquid flow rate of the Thermal Oxidizer/Scrubber and the combustion temperatures of the thermal oxidizers.
		Br2	See additional notes:		Exflur will monitor the scrubbing liquid flow rate of the Thermal Oxidizer/Scrubber and the combustion temperatures of the thermal oxidizers.
		HCl	Production rate or flow as appropriate Monitoring consistent with Control Device	Yes	Exflur will monitor the scrubbing liquid flow rate of the Thermal Oxidizer/Scrubber and the combustion temperatures of the thermal oxidizers.
		HBr	See additional notes:		Exflur will monitor the scrubbing liquid flow rate of the Thermal Oxidizer/Scrubber and the combustion temperatures of the thermal oxidizers.
		Carbon Compounds excluding VOC & CO NOx	See additional notes:		Exflur will monitor the scrubbing liquid flow rate of the Thermal Oxidizer/Scrubber and the combustion temperatures of the thermal oxidizers.
TO1-2	Control: Oxidizer: Thermal	CO	Waste gas flow monitor or operation record that provides flow by design. Waste gas flow monitor or operation record that provides flow by design.	Yes	Exflur will monitor the hydrogen fuel flow rate and the combustion temperatures of the thermal oxidizers.
		PM	The emission monitoring techniques for PM10 and PM2.5 will follow the technique for PM. Visible emissions check quarterly See additional notes:	Yes	Exflur will monitor the hydrogen fuel flow rate and the combustion temperatures of the thermal oxidizers.
EP3-2	Other	VOC	See additional notes:		Exflur will monitor the amount of product processed in the washing reactor and the temperature in the reactor.
EP3-3	Other	VOC	See additional notes:		Exflur will monitor the amount of product processed in the washing reactor and the temperature in the reactor.
EP3-4	Wastewater Facilities	VOC	Daily Flow into treatment plant. Quarterly AVO check of water seal where site wastewater emissions		No monitoring is proposed because there are no emissions expected from this source.

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FUG3-1	Fugitives: Piping and Equipment Leak	VOC	Use EPA Method 21 to monitor for leaks from seals on pumps, compressors, agitator and valve seals on piping components in light liquid and gas VOC service quarterly. Gas or hydraulic check new and a replaced connectors prior to returning to service, or monitor with Method 21 within 15 days of returning to service. Leak detection and repair (LDAR) Program 28M has a leak definition where repair action is required at 10,000 ppmv. LDAR Program 28 VHP has a leak definition where repair action is required at 500 ppmv for valves and connectors and 2000 ppmv for pumps, compressors and agitators. Check connectors weekly using audio, visual or olfactory (AVO) senses to observe leaks. Record results and corrective action taken.	Yes	Leaks from many of the streams that contain VOC would also contain HF. TCEQ's APD6 6422 indicates the 28AVO program applies to HF. The 28AVO program will be used to monitor fugitive components on those streams and that monitoring will result in detection of leaks that include VOC. AVO inspections will be done once per shift per day including weekends and holidays. The uncontrolled VOC emissions are < 10 tpy.
		HF	See additional notes:		TCEQ's APD6 6422 indicates the 28AVO program applies to HF. The 28AVO program will be used to monitor fugitive components where HF would be present in the leaked material. AVO inspections will be done once per shift per day including weekends and holidays.
		F2	See additional notes:		Streams that contain F2 also contain HF. Exflur will use the 28AVO program to monitor the fugitive components in F2 and HF service. AVO inspections will be done once per shift per day including weekends and holidays.
		Br2	See additional notes:		Bromine (Br2) has published odor thresholds in a range that is very low, lower than HF in some cases. Therefore, Br2 leaks will be detected during weekly walk-throughs of the building. Uncontrolled Br2 fugitive emissions are less than 0.6 ton per year.
		Carbon Compounds excluding VOC & CO	See additional notes:		Leaks from many of the streams that contain carbon compounds other than VOC and CO would also contain HF. Exflur will use the 28AVO program to monitor those fugitive components. AVO inspections will be done once per shift per day including weekends and holidays.
		H2	See additional notes:		Streams that contain H2 also contain HF. Exflur will use the 28AVO program to monitor the fugitive components in HF service. AVO inspections will be done once per shift per day including weekends and holidays.
FUG3-2	Fugitives: Piping and Equipment Leak	VOC	Use EPA Method 21 to monitor for leaks from seals on pumps, compressors, agitator and valve seals on piping components in light liquid and gas VOC service quarterly. Gas or hydraulic check new and a replaced connectors prior to returning to service, or monitor with Method 21 within 15 days of returning to service. Leak detection and repair (LDAR) Program 28M has a leak definition where repair action is required at 10,000 ppmv. LDAR Program 28 VHP has a leak definition where repair action is required at 500 ppmv for valves and connectors and 2000 ppmv for pumps, compressors and agitators. Check connectors weekly using audio, visual or olfactory (AVO) senses to observe leaks. Record results and corrective action taken.		VOC leaks will be detected during weekly walk-throughs of the EPN FUG3-2 area. EPN FUG3-2 VOC fugitive emissions are less than 0.2 ton per year. Site VOC uncontrolled fugitive emissions are less than ten tons per year. Therefore, the 28 series LDAR programs are not required.

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FUG3-3	Fugitives: Piping and Equipment Leak	HCl	Look for leaks twice per shift using audio, visual or olfactory (AVO) senses to observe leaks. Record results and corrective action taken.	AVO inspections will be done once per day including weekends and holidays. EPN FUG3-2 HCl emissions are less than 0.04 tpy without applying any control credit. Site HCl uncontrolled fugitive emissions are less than 0.1 tpy.
		VOC	Use EPA Method 21 to monitor for leaks from seals on pumps, compressors, agitator and valve seals on piping components in light liquid and gas VOC service quarterly. Gas or hydraulic check new and a replaced connectors prior to returning to service, or monitor with Method 21 within 15 days of returning to service. Leak detection and repair (LDAR) Program 28M has a leak definition where repair action is required at 10,000 ppmv. LDAR Program 28 VHP has a leak definition where repair action is required at 500 ppmv for valves and connectors and 2000 ppmv for pumps, compressors and agitators. Check connectors weekly using audio, visual or olfactory (AVO) senses to observe leaks. Record results and corrective action taken.	
FUG3-4	Fugitives: Piping and Equipment Leak	HCl	Look for leaks twice per shift using audio, visual or olfactory (AVO) senses to observe leaks. Record results and corrective action taken.	AVO inspections will be done once per day including weekends and holidays. EPN FUG3-3 HCl emissions are less than 0.04 tpy without applying any control credit. Site HCl uncontrolled fugitive emissions are less than 0.1 tpy.
		VOC	Use EPA Method 21 to monitor for leaks from seals on pumps, compressors, agitator and valve seals on piping components in light liquid and gas VOC service quarterly. Gas or hydraulic check new and a replaced connectors prior to returning to service, or monitor with Method 21 within 15 days of returning to service. Leak detection and repair (LDAR) Program 28M has a leak definition where repair action is required at 10,000 ppmv. LDAR Program 28 VHP has a leak definition where repair action is required at 500 ppmv for valves and connectors and 2000 ppmv for pumps, compressors and agitators. Check connectors weekly using audio, visual or olfactory (AVO) senses to observe leaks. Record results and corrective action taken.	
		HCl	Look for leaks twice per shift using audio, visual or olfactory (AVO) senses to observe leaks. Record results and corrective action taken.	AVO inspections will be done once per day including weekends and holidays. EPN FUG3-4 HCl emissions are less than 0.04 tpy without applying any control credit. Site HCl uncontrolled fugitive emissions are less than 0.1 tpy.

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Materials**

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REVISED SEPTEMBER 2021
PERMIT NO.: 165848
EXFLUOR RESEARCH CORPORATION

Item	How submitted	Date submitted
A. Administrative Information		
Form PI-1 General Application	STEERS	09/02/2021
Hard copy of the General sheet with original (ink) signature	STEERS	09/02/2021
Professional Engineer Seal	STEERS	09/02/2021
B. General Information		
Copy of current permit (both Special Conditions and MAERT)		
Core Data Form	Not applicable	
Area map	STEERS	09/02/2021
Plot plan	STEERS	09/02/2021
Process description	STEERS	09/02/2021
Process flow diagram	STEERS	09/02/2021
List of MSS activities		
State regulatory requirements discussion	STEERS	09/02/2021
C. Federal Applicability		
Summary and project emission increase determination - Tables 1F and 2F	Not applicable	
Netting analysis (if required) - Tables 3F and 4F as needed	Not applicable	
D. Technical Information		
BACT discussion, if additional details are attached	STEERS	09/02/2021
Monitoring information, if additional details are attached	Not applicable	
Material Balance (if applicable)	STEERS	09/02/2021
Calculations	STEERS	09/02/2021
E. Impacts Analysis		
Qualitative impacts analysis	STEERS	09/02/2021
MERA analysis	STEERS	09/02/2021
EMEW: SCREEN3	Not applicable	
EMEW: NonSCREEN3	STEERS	09/02/2021
PSD modeling protocol	Not applicable	
F. Additional Attachments		

ATTACHMENT 3

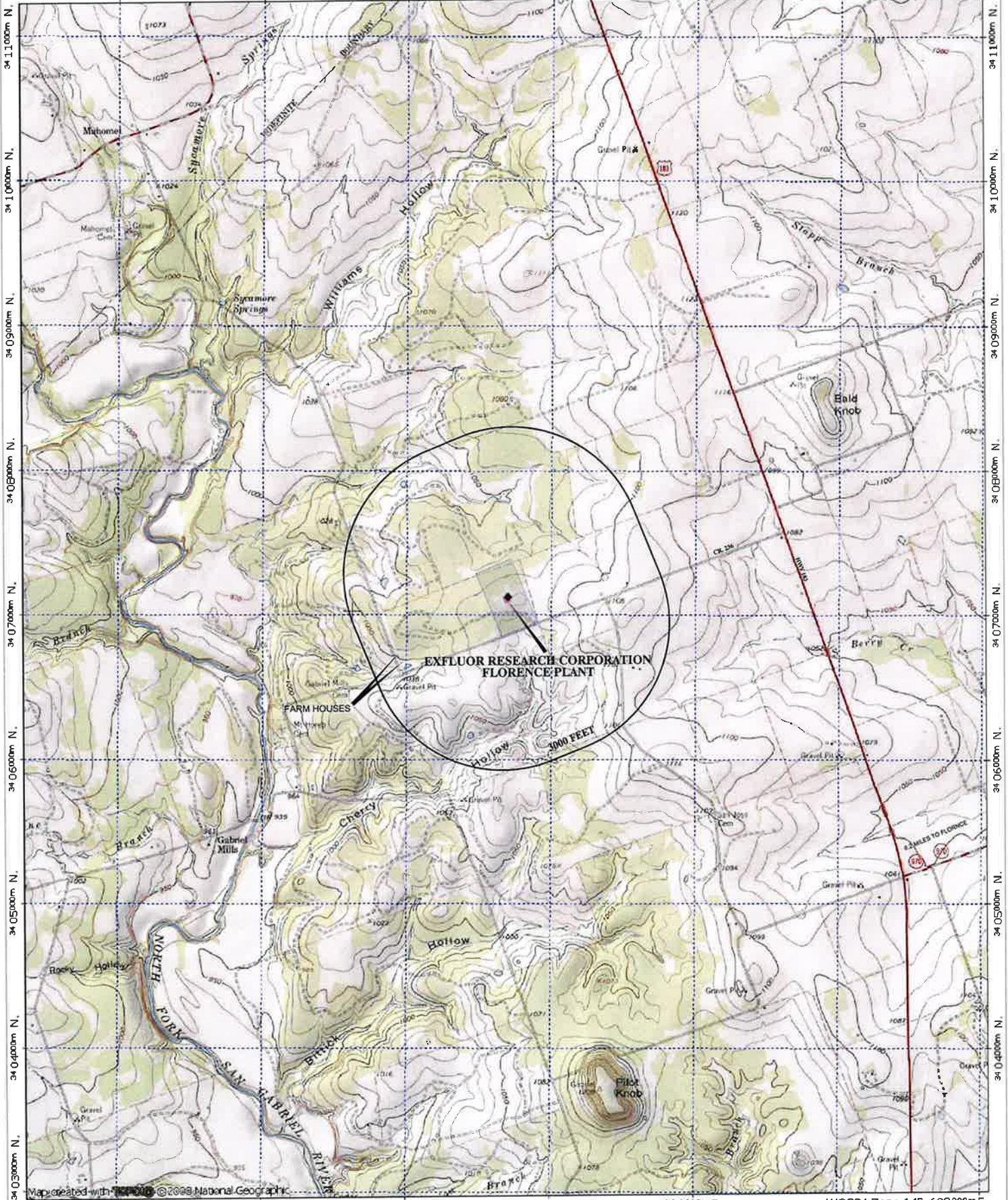
NON-CONFIDENTIAL PROCESS DESCRIPTION

The Exflur Research Corporation (Exflur) facility consists of 1 large warehouse building that includes office space and laboratories situated on over 36 acres. Exflur will produce a variety of specialty fluorocarbons by a fluorination process. Various hydrocarbons are slowly reacted with fluorine (F₂) gas in a stirred fluorine-inert solvent. The resulting products are typically purified by distillation to give the perfluorinated (completely fluorinated) products. The fluorine gas used in making the products is generated onsite. The detailed process description is considered confidential and is provided in the separate confidential part of the permit application.

ATTACHMENT 4
NON-CONFIDENTIAL AREA MAP

30°47'33" N, 97°54'21" W WGS84 1964 Mahomet, TX

602000m E, 603000m E, 604000m E, 605000m E, 606000m E, 607000m E.

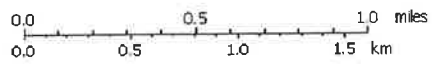


34 11000m N, 34 10000m N, 34 09000m N, 34 08000m N, 34 07000m N, 34 06000m N, 34 05000m N, 34 04000m N, 34 03000m N.

34 11000m N, 34 10000m N, 34 09000m N, 34 08000m N, 34 07000m N, 34 06000m N, 34 05000m N, 34 04000m N, 34 03000m N.

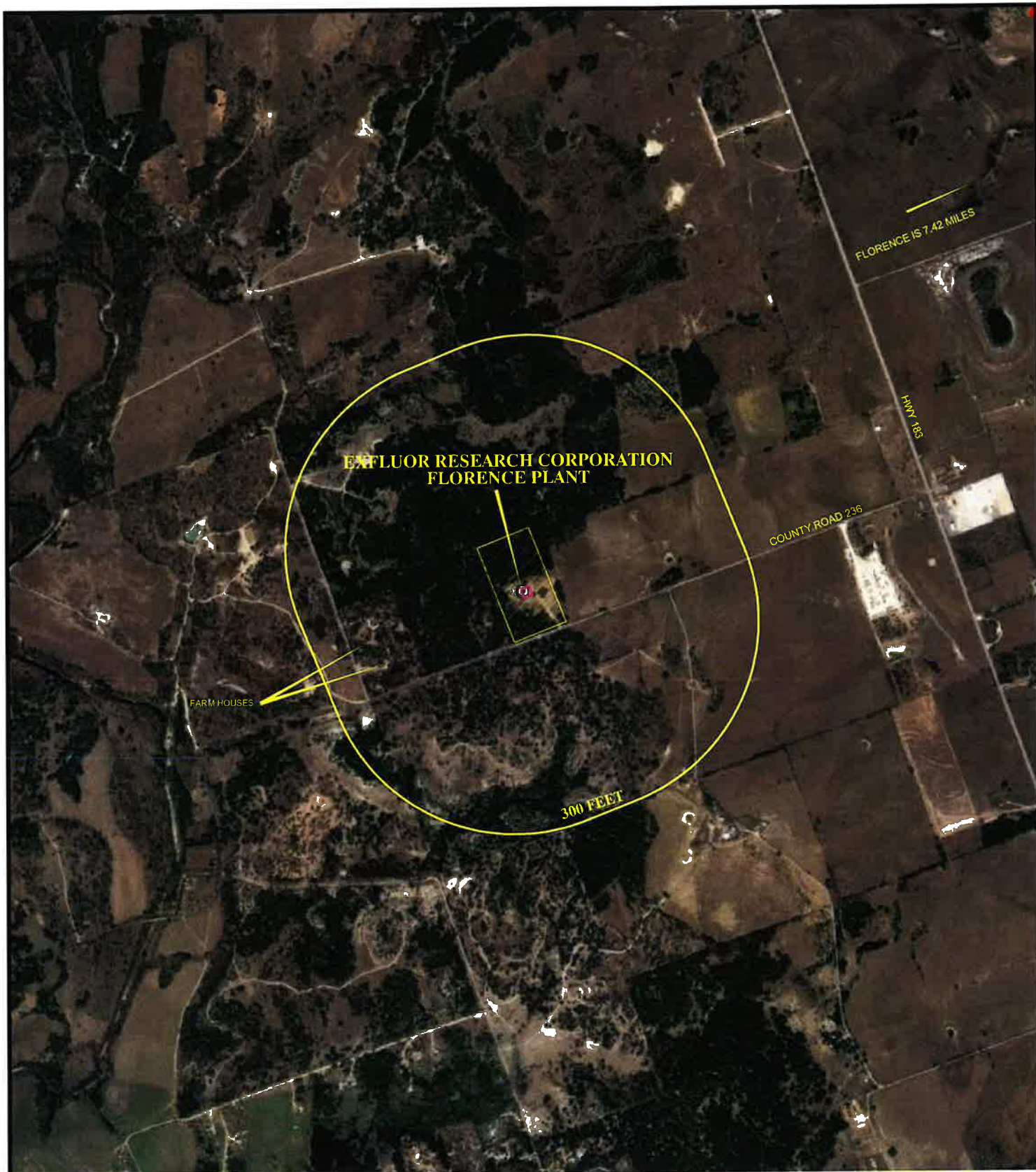
Map created with 100000 ©2000 National Geographic

602000m E, 603000m E, 604000m E, 605000m E, 606000m E, 608000m E. WGS84 Zone 14R



WAD ENVIRONMENTAL
EXF14242AREAMAP.DWG





FARM HOUSES

EXFLUOR RESEARCH CORPORATION
FLORENCE PLANT

300 FEET

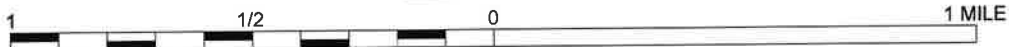
COUNTY ROAD 236

HWY 183

FLORENCE IS 7.42 MILES



30°47' 33" N -97°54' 21" W WGS84
QUADRANGLE MAHOMET, TX
TEXAS - FLORENCE



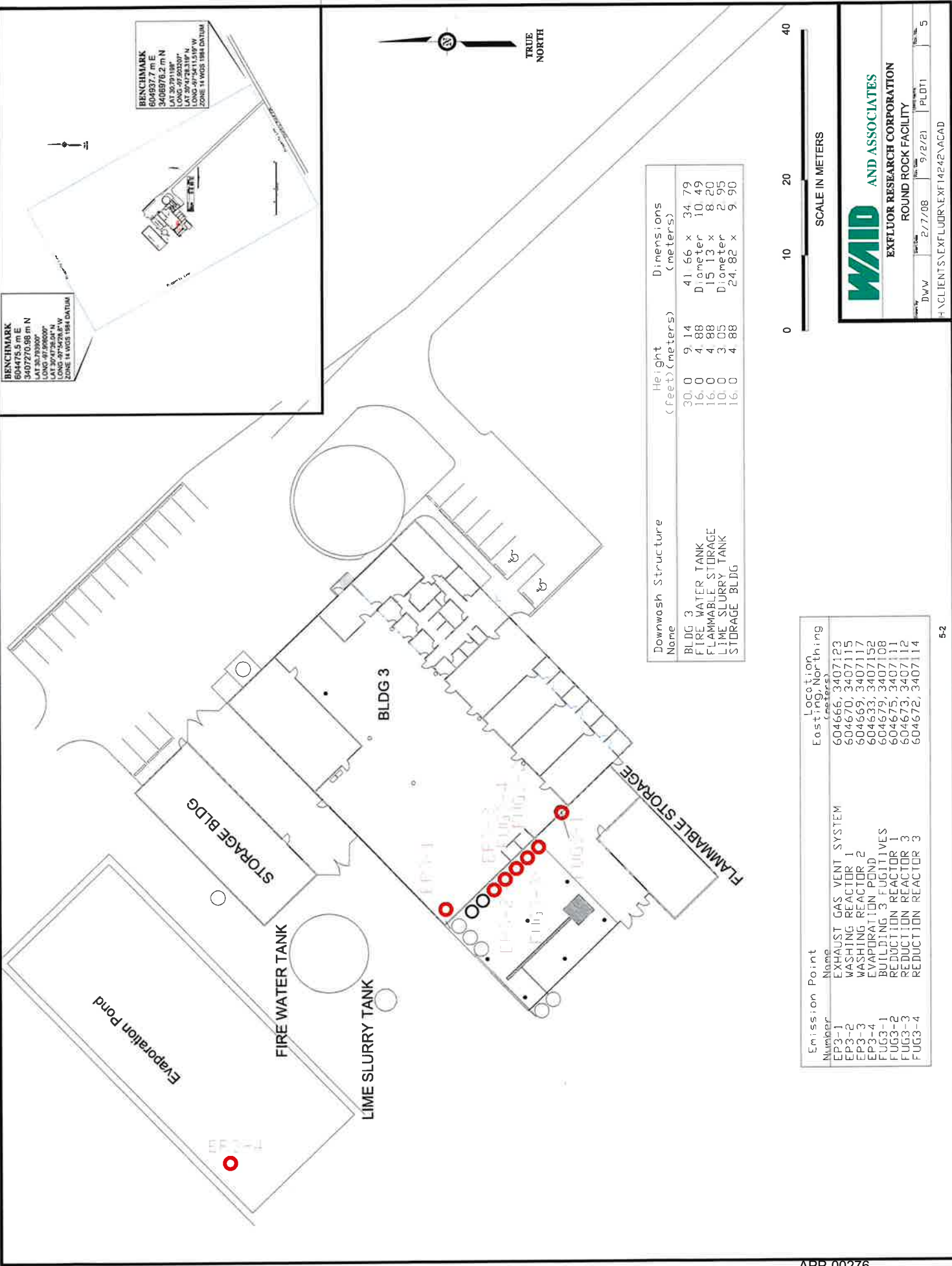
W A I D ENVIRONMENTAL

EFL14242AERIALAREAMAP.DWG

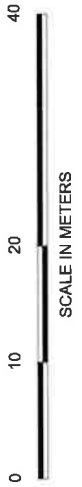
ATTACHMENT 5
NON-CONFIDENTIAL PLOT PLAN

BENCHMARK
 604475.5 m E
 3407270.98 m N
 LAT 30.73300°
 LONG -87.59500°
 UTM 14 QGS 1884 DATUM
 ZONE 14 WGS 1984 DATUM

BENCHMARK
 604937.7 m E
 3408876.2 m N
 LAT 30.79198°
 LONG -87.60300°
 UTM 14 QGS 1884 DATUM
 ZONE 14 WGS 1984 DATUM



Downwash Structure	Height (feet)	Height (meters)	Dimensions (meters)
None	30.0	9.14	41.66 x 34.79
BLDG 3	16.0	4.88	Diameter 10.49
FIRE WATER TANK	16.0	4.88	15.13 x 8.20
FLAMMABLE STORAGE	10.0	3.05	Diameter 2.95
LIME SLURRY TANK	16.0	4.88	24.82 x 9.90
STORAGE BLDG			



Emission Point Number	Name	Location Easting (meters)	Location Northing (meters)
EP3-1	EXHAUST GAS VENT SYSTEM	604666	3407123
EP3-2	WASHING REACTOR 1	604870	3407115
EP3-3	WASHING REACTOR 2	604669	3407117
EP3-4	EVAPORATION POND	604633	3407152
FUG3-1	BUILDING 3 FUGITIVES	604673	3407108
FUG3-2	REDUCTION REACTOR 1	604675	3407111
FUG3-3	REDUCTION REACTOR 3	604673	3407112
FUG3-4	REDUCTION REACTOR 3	604672	3407114

MAID AND ASSOCIATES
 EXFLUOR RESEARCH CORPORATION
 ROUND ROCK FACILITY

Drawn By: DWV Date: 2/7/08
 Scale: 1/8"=1'-0" Plot No: PLD01
 Job No: 5

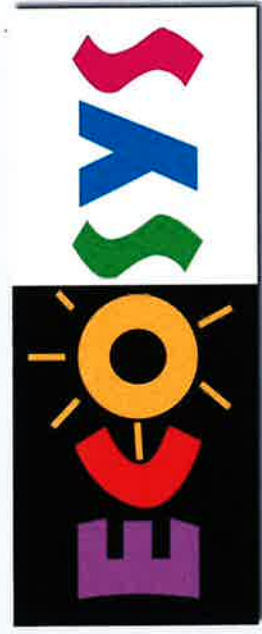
CLIENT: EXFLUOR\EXF14242\CAD

EXFLUOR RESEARCH CORPRATION
PERMIT APPLICATION NO. 165848
ADDITONAL INFORMATION

SEPTEMBER 2, 2021

ATTACHMENT 6

**NON-CONFIDENTIAL Destruction/Removal Efficiency Data for the EcoSys Marathon
Integrated Combustion-Wet Abatement Device Data**



EcoSys Abatement

Marathon™

**M8500/M8600 Integrated Combustion-Wet Abatement Device
Destruction/Removal Efficiency Data
August 24th, 2021**

EcoSys Abatement Confidential

Safety Disclaimer



Risk management is the responsibility of the customer. EcoSys makes a good faith effort to provide expert advice and excellent engineered solutions for challenging abatement requirements, usually including toxic, combustible/flammable, corrosive, and otherwise dangerous process chemicals used in electronics and other manufacturing. In addition to these chemical hazards, other physical hazards are also present such as high pressure, low pressure, high temperature, mechanical, electrical and other hazards. The suitability of use of an abatement device is dependent on many factors including process conditions, facilities context and design, maintenance, and monitoring. EcoSys recommends customers document all process conditions, including nominal case and expected worst case, and conduct a thorough internal EHS review of all abatement devices and the context within which they will provide service.

Marathon™ M8500 Integrated Combustion-Wet Abatement Device



Benefits

- High Flow Capacity (700 slm) with maximum 4/6 Inlets/unit
- High Thermal Capacity (300 slm H₂ equivalent)
- In-line Flame Arrestor at Inlet
- FM4910 Fire-retarded Material Option
- PFC Treatment (CF₄ DRE > 99%)

Target Applications

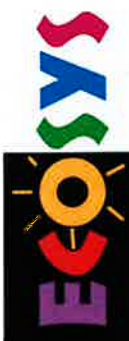
- Flat Panel Display/LCD Market
- CVD/PVD – Low-k, WCVD, HDP, SACVD etc.
- Diffusion –Poly, SiN etc.
- Etch PFC processes
- Epitaxy

Reliability*

- Uptime >99%
- MTBF 20,000 hrs. (>2 years)
- MTTR 1 hr.
- MTBS 30k wafers (stretch 60k)
- MTTS 2 hr.

*Process Dependent

Marathon™ M8500 Advantages



Modular Design with Front-side Service Access

- Subassemblies slide out on rails for easier access
- Less Serviceable Footprint than competitive systems with lower flow capacity

Stable Thermal Processing

- Fuel Compressor prevents fuel pressure fluctuations common with natural gas or LPG in negative pressure environments
- Prevents flame-outs

Patented Oxygen Enriched Air (OEA) technology for PFC abatement without O₂

- System separates compressed dry air (CDA) into N₂ and Oxygen Enriched Air for purging & combustion

Smart Abatement Technology (lower CoO, reduced fuel & cooling water consumption)

- Thermostatic Valve on cooling water line automatically regulates flow to reduce consumption

SEMI Standard Protocol e-Diagnostics

- Controls Interface with process tool
- Optimizes Performance & Reduces COO



Marathon™ M8500 Theory of Operation



Inlet manifold with automatic bypass valves

- Patented fuel delivery method for optimized fuel utilization

Fuel-fired thermal reactor

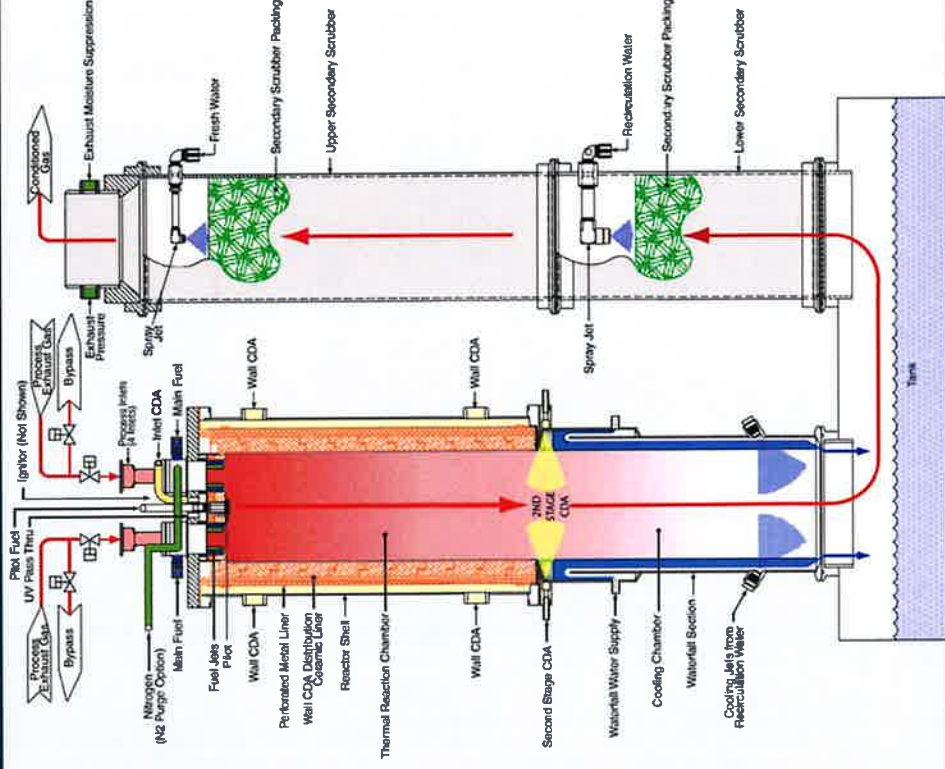
- Staged combustion - Reduces CO & NOx formation
- Passive particulate remediation

Quench section

- Spray nozzles
- Recirculated waterfall

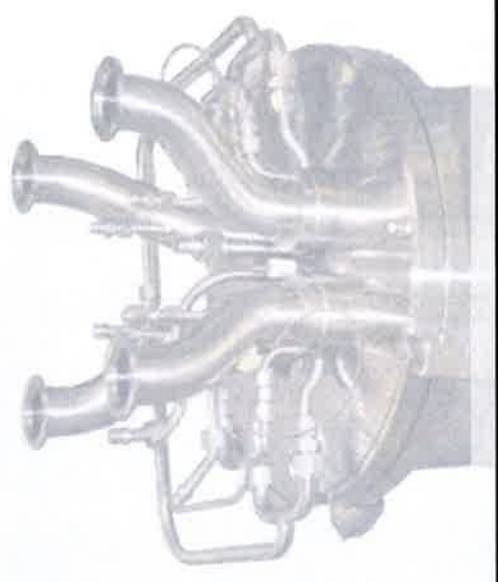
Secondary scrubbing sections

- Large diameter packed beds
- Counter-current water flow
- Fresh water to upper secondary





EcoSys Abatement Marathon™ M8500/M8600 Destruction/Removal Efficiency (DRE) & Test Data



Marathon™ M8500 Efficiency Performance



Superior Destruction/Removal Efficiency (DRE) Performance

Chemical	DRE (%)	Max. Flowrate Tested (slm)
4MS [Si(CH3)4]	>99	2.0
C2F6	>99	2.5
C3F8	>99	3.0
CF4	>99	4.0
Cl2	>99	2.0
DCS (SiH2Cl2)	>99	0.5
F2	>99	10.0
F2	>99	29.3
GeH4	>99	0.9

Chemical	DRE (%)	Max. Flowrate Tested (slm)
H2	>99	230.0
HCl	>99	100.0
HF	>99	36.0
mDEOS	>99	0.3
N2O	>99	125.0
NF3	>99	12.0
NF3	>99	21.0
NH3	>99	5.6
O3	>99	90.0

Chemical	DRE (%)	Max. Flowrate Tested (slm)
OMCTS	>99	0.5
SF6	>99	5.0
SiCl4	>99	n/a*
SiF4	>99	n/a*
SiH4	>99	12.0
TCS (SiHCl3)	>99	n/a*
TEOS ((C2H5O)4Si)	>99	30 mg/min

* Detected as a byproduct

Suitable for all applications:

- III/V
- ALD
- CVD

- Diffusion
- EPI
- Etch
- LCD/FPD

- MEMS
- PFCs
- PV
- Etc.

Marathon™ M8500 Efficiency Performance Cont.

Superior Destruction/Removal Efficiency (DRE) Performance

Chemical	DRE (%)
3MS (SiH(CH ₃) ₃)	>99
AsH ₃	>99
B ₂ H ₆	>99
BCl ₃	>99
BF ₃	>99
BTBAS (C ₈ H ₂₂ N ₂ Si)	>99
C ₄ F ₆	>99
C ₄ F ₈	>99
C ₅ F ₈	>99
CH ₂ F ₂	>99

Chemical	DRE (%)
CH ₃ F	>99
CHF ₃	>99
ClF ₃	>99
CO	>99
HBr	>99
HfCl ₄	>99
HMDS (NH(Si(CH ₃) ₃) ₂)	>99
HMDSO (C ₆ H ₁₈ OSi ₂)	>99
NO	Unknown
NO ₂	Unknown

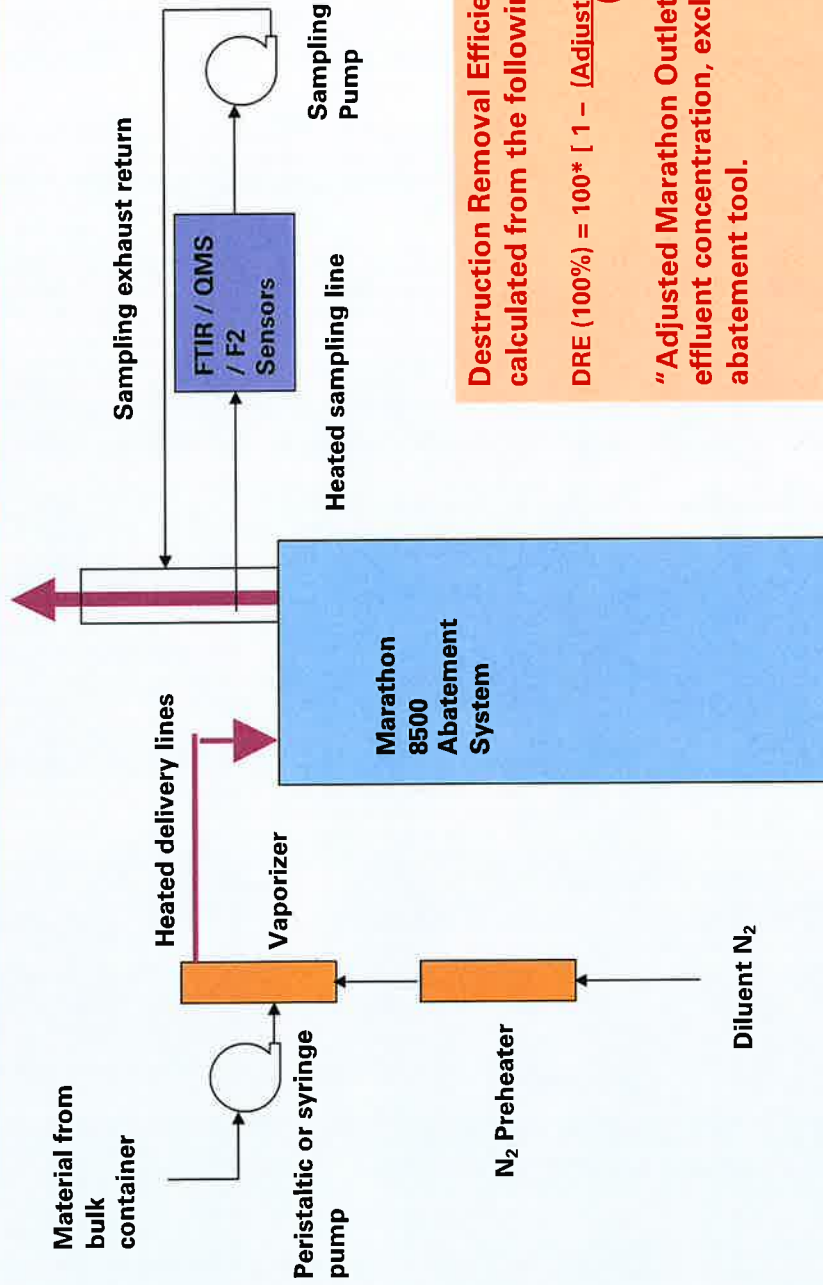
Chemical	DRE (%)
OF ₂	Unknown
PH ₃	>99
Si ₂ H ₆	>99
TDEAT (Ti[N(CH ₂ CH ₃) ₂] ₄)	>99
TDMAT (Ti[N(CH ₃) ₂] ₄)	>99
TiCl ₄	>99
TMB ((CH ₃ O) ₃ B)	>99
TMCTS ((HSiCH ₃ O) ₄)	>99
TMP ((CH ₃ O) ₃ P)	>99
WF ₆	>99

Raw data unavailable and/or performance extrapolated from previous generation product and/or modelled/predicted
 Inquire if empirical test data is desired

Marathon™ M8500 Typical DRE Experimental Apparatus



Destruction Removal Efficiency (DRE) measurement is based on SEMI Standard



Destruction Removal Efficiency (DRE) for each species is calculated from the following equation:

$$DRE (100\%) = 100 * [1 - \frac{\text{Adjusted Marathon Outlet Conc} \text{ ppm}]}{\text{Marathon Inlet Conc} \text{ ppm} }$$

"Adjusted Marathon Outlet Conc" = corrected process effluent concentration, excluding dilution effects from the abatement tool.

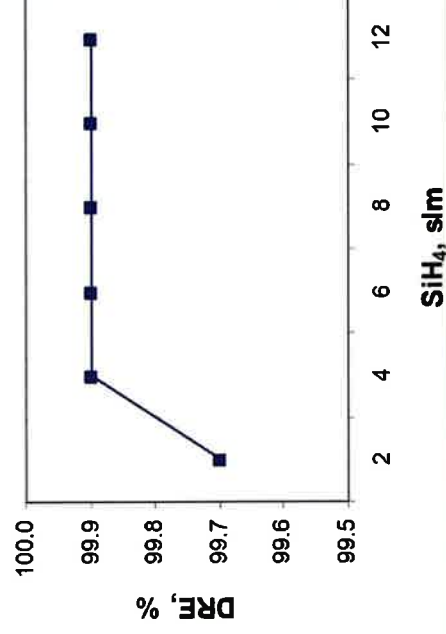
SiH₄ Abatement

SiH₄ abatement efficiency >99% for all flows

- 2 – 12 slm SiH₄
- CO below detection limit (0.5 ppm) for all flows
- NOx <160 ppm
- No OEA required

Variable SiH₄ Flow

SiH₄ DRE vs. Flow
45slm Fuel



Low-k Abatement

4MS

- 2 slm test flow
- >99.7% DRE (< 5 ppm emitted)
- CO emissions to be quantified

OMCTS

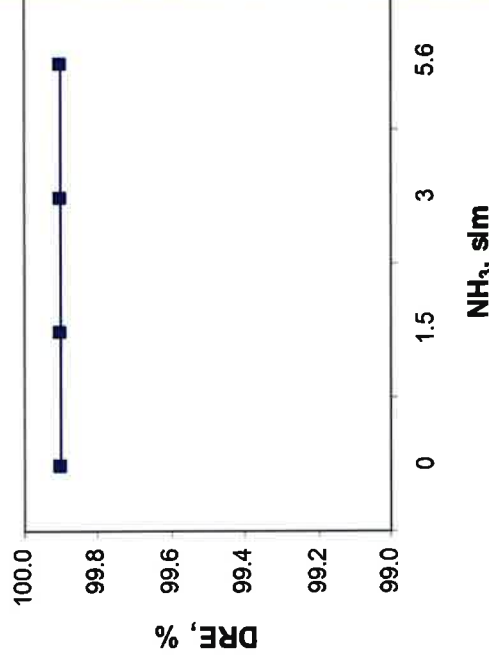
- 0.5 slm test flow
- >99.8% DRE (<1 ppm detection limit emitted)
- Marathon testing performed (hundreds of kgs) to optimize reactor for minimization of particulate agglomeration

NH₃ Abatement

NH₃ abatement efficiency >99% for all flows

- 0.25 – 5.6 slm NH₃
- NH₃ emissions <1 ppm
- Thermally destroyed
- CO below detection limit (0.5 ppm) for all flows
- NOx <250 ppm
- No OEA required

Variable NH₃ Flow
NH₃ DRE vs. Flow Rate
45slm Fuel



Note:

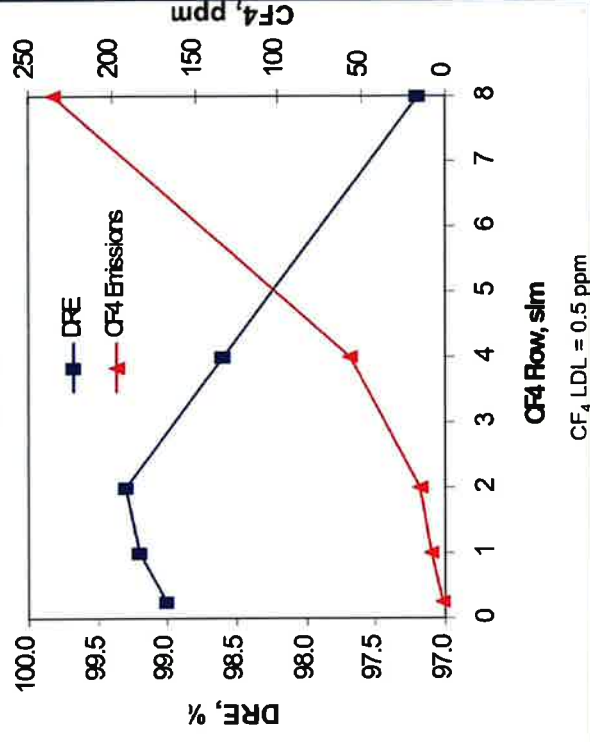
- CF₄ is the hardest PFC molecule to abate due to its' high molecular bond strength
- The "Oxygen Enriched Air (OEA)" option is required for increased heating.
- This option is generally not required.

CF₄ Abatement

- Four chamber simulation for all data
 - Pump purge maximized at 50 slm
 - Fuel flow 80 slm
- Required oxygen-enriched air module
- Abatement efficiency decreases with increased flow
 - >99% for flows 0.25-2 slm
 - >98% for 2-4 slm
 - >97% for 4-8 slm
- NOx emissions <410 ppm for all flows
- CO < detection limit (0.5 ppm)

Variable CF₄ Flow

CF₄ DRE vs. Row Rate
80 slm Fuel



Marathon™ M8500 Abatement Performance – CF₄ Tabular



Flow, slm	Total Inlet, slm	Fuel per Inlet, slm	Total Fuel, slm	Gas Out, ppm	CO, ppm	NOx, ppm	DRE, %
0.25	200	20	80	1.3	ND	ND	99.0
0.25	200	20	80	<1	ND	ND	>99.0
1	200	20	80	2.6	ND	ND	99.7
1	200	20	80	<2.5	ND	ND	>99.8
1	200	20	80	8.7	ND	ND	99.2
1	200	20	80	<1.5	<0.5	397	>99.8
2	200	20	80	14.3	<0.5	407	99.3
4	200	20	80	56.8	<0.5	393	98.6
8	200	20	80	234.5	<0.5	352	97.2

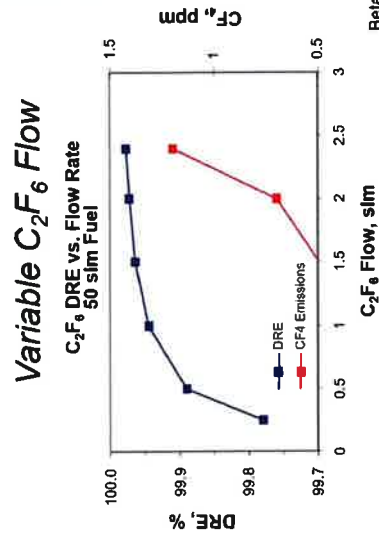
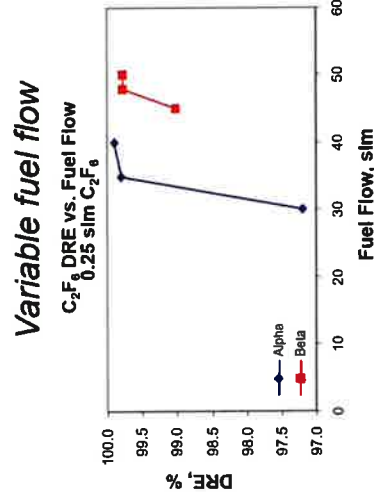
Marathon™ M8500 Abatement Performance – C₂F₆



C₂F₆ Abatement

- Variable fuel flow
 - 0.25 slm C₂F₆
 - DRE >97.2% for fuel flow 30 slm
 - DRE >99.9% for fuel flow 35 slm*
- Variable C₂F₆ Flow
 - 0.25 – 2.5 slm C₂F₆
 - 50 slm fuel
 - C₂F₆ < detection limit (0.5 ppm)
 - CF₄ emissions <1.5 ppm
- NOx and CO < detection limits
- No OEA required

*Up to 60 slm tested



Marathon™ M8500 Abatement Performance – C₂F₆ Tabular



System	Flow, slm	Total Inlet, slm	Total Fuel, slm	Gas Out, ppm	CO, ppm	NOx, ppm	CF4 By-product Emitted, ppm	DRE, %
Alpha	0.25	200	30	6.2	<0.5	<11	ND	97.2
Alpha	0.25	200	35	0.4	ND	ND	ND	99.8
Alpha	0.25	200	40	<0.2	<0.5	<11	ND	>99.9
Beta	0.25	200	45	2.2	ND	ND	<0.5	99.0
Beta	0.25	200	48	<0.5	ND	ND	<0.5	>99.8
Beta	0.25	200	50	<0.5	ND	ND	<0.5	>99.8
Beta	0.5	200	50	<0.5	ND	ND	<0.5	>99.9
Beta	1	200	50	<0.5	ND	ND	<0.5	>99.9
Beta	1.5	200	50	<0.5	ND	ND	<0.5	>99.9
Beta	2	200	50	<0.5	ND	ND	0.7	>99.9
Beta	2.4	200	50	<0.5	ND	ND	1.2	>99.9
Beta	2.4	200	48	<0.5	ND	ND	1.3	>99.9

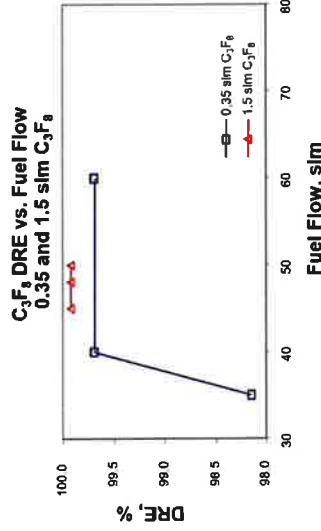
Marathon™ M8500 Abatement Performance – C₃F₈



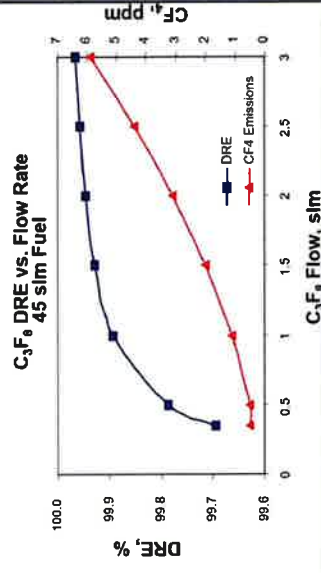
C₃F₈ Abatement

- Variable fuel flow
 - 0.35 slm C₃F₈
 - DRE >98.2% for fuel flow 36.5 slm
 - DRE >99.7% for fuel flow 41.5 slm
 - 1.5 slm C₃F₈
 - DRE >99.9% for fuel flow 40 slm
 - Minimum fuel flow not determined
- Variable C₃F₈ Flow
 - 0.35 – 3.0 slm C₃F₈
 - 45 slm fuel
 - C₃F₈ < detection limit (1 ppm)
 - CF₄ emissions < 6 ppm
- No OEA required
- NOx and CO not yet quantified, but expected to be analogous to C₂F₆ data

Variable fuel flow



Variable C₃F₈ Flow



Marathon™ M8500 Abatement Performance – C₃F₈ Tubular



Flow, slm	Total Inlet, slm	Total Fuel, slm	Gas Out, ppm	CO, ppm	NOx, ppm	CF4 By-product Emitted, ppm	DRE, %	CO, lb/yr	NOx, lb/yr
0.35	200	41.5	<1.0	ND	ND	0.5	>99.69	ND	ND
0.35	200	36.5	6	ND	ND	0.5	98.15	ND	ND
0.35	200	41.5	<1.0	ND	ND	0.5	>99.69	ND	ND
0.35	200	45	<1.0	ND	ND	0.5	>99.69	ND	ND
0.5	200	45	<1.0	ND	ND	0.5	>99.79	ND	ND
1	200	45	<1.0	ND	ND	1.1	>99.89	ND	ND
1.5	200	45	<1.0	ND	ND	2	>99.93	ND	ND
1.5	200	45	<1.0	ND	ND	2	>99.93	ND	ND
1.5	200	42	<1.0	ND	ND	1.7	>99.93	ND	ND
1.5	200	40	<1.0	ND	ND	1.3	>99.93	ND	ND
1.5	200	45	<1.0	ND	ND	1.8	>99.93	ND	ND
2	200	45	<1.0	ND	ND	3.1	>99.95	ND	ND
2.5	200	45	<1.0	ND	ND	4.4	>99.96	ND	ND
3	200	45	<1.0	ND	ND	5.9	>99.96	ND	ND

F₂ Abatement

F₂ abatement efficiency >99% for all flows

- 0.2 – 8 slm F₂ tested (equivalent to 5.3 slm NF₃)
- All F₂ emissions < 0.6 ppm (most below detection limit of 0.2 ppm)
- Maximum CF₄ byproduct of 38 ppm (at 8 slm F₂)
- OF₂ < 1.5 ppm detection limit
- No OEA required

Marathon™ M8500 Abatement Performance – F₂ Tabular

Flow, slm	Total Inlet, slm	Total Fuel, slm	Gas Out, ppm	CO, ppm	NOx, ppm	CF4 By-product Emitted, ppm	DRE, %
0.2	200	40	2	ND	ND	<1	98.9
0.4	200	40	0.4	ND	ND	<1	>99.8
1.0	200	40	<0.2	ND	ND	<1	>99.9
2.0	200	40	0.4	ND	ND	<1	>99.9
4.0	200	40	<0.2	ND	ND	6.3	>99.9
6.0	200	40	<0.2	ND	ND	18.5	>99.9
8.0	300	40	0.3	ND	ND	30.4	>99.9
8.0	470	40	0.3	ND	ND	13.6	>99.9
8.0	200	40	0.6	ND	ND	38.0	>99.9
4.6	470	80	<0.2	ND	ND	0.2	99.9
5.0	470	80	<0.2	ND	ND	<1	99.9



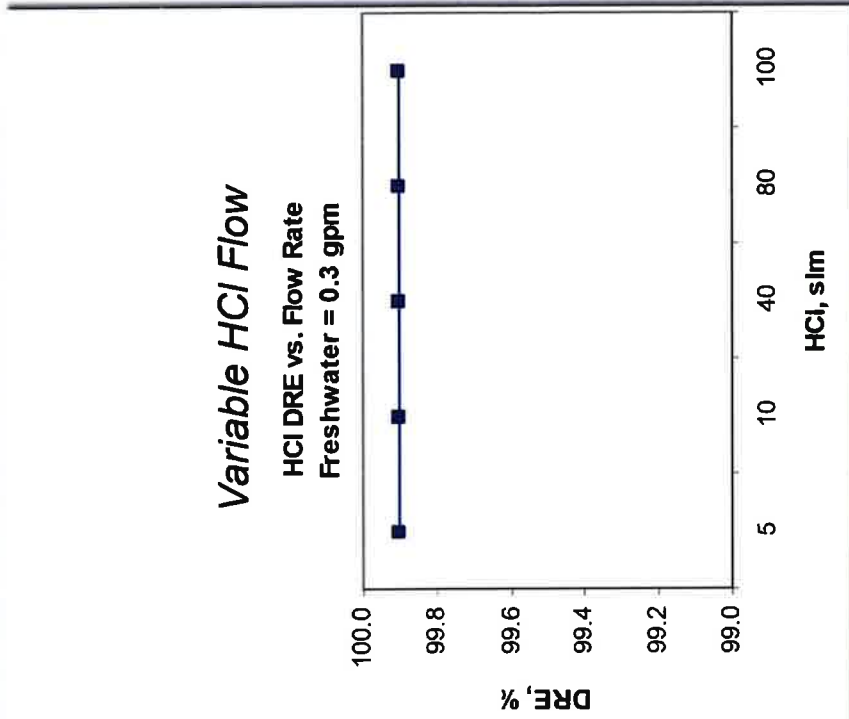
HCl Abatement

Test Conditions

- Utilized wet scrubber subsystem only
- Achieved equilibrium
- HCl flow rate up to 100 slm
- N2 inert flow = 1000 slm
- Fresh H₂O consumption = 0.3 gpm

Results

- HCl DRE >99.9%
- HCl emissions < 2 ppm detection limit



HF Scrubbing Efficiency

Test Conditions

- Utilized wet scrubber subsystem only
- Achieved equilibrium
- HF flow rate = 36 slm (equivalent to 12 slm NF_3)
- N_2 inert flow = 900 slm
- Fresh H_2O consumption = 0.4 gpm

Results

- HF DRE >99.9%
- HF emissions <1 ppm

Marathon™ M8500 Abatement Performance – N₂O



N₂O Abatement

Excellent DRE of N₂O >99% at flow rate up to 125 slpm
NO_x emission to be reduced by process optimization

Total N ₂ O Flow Rate (slm)	Total N ₂ Pump Purge (slm)	Total Fuel Flow Rate (slm)	N ₂ O DRE (%)	Exhaust NO (ppm)	Exhaust NO ₂ (ppm)
5	200	60	>99.4	<120	<40
60	200	60	>99.9	2377	117
100	200	60	>99.9	5430	696
125	200	60	>99.9	7058	1246
125	470	60	>99.1	4235	481
125	470	70	>99.7	3977	378
125	470	80	>99.9	1493	84

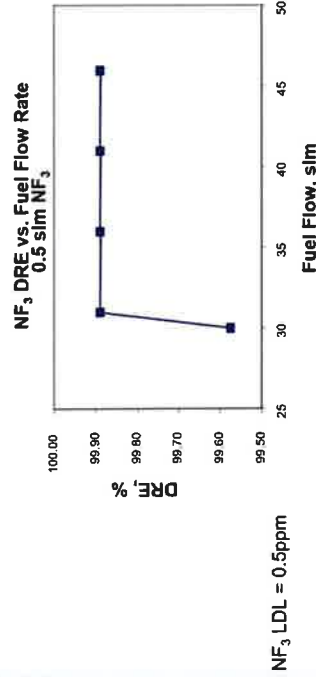


NF₃ Abatement

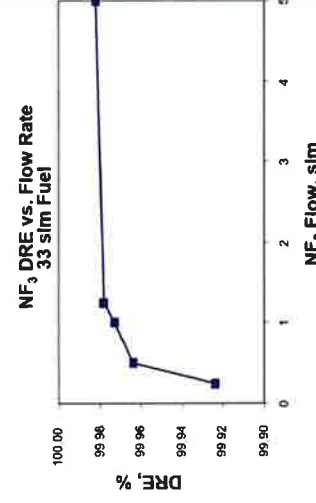
NF₃ abatement efficiency >99% for all flows

- DRE >99.9% and BDL for all fuel flows >30slm
- 0.25 – 4.5 slm NF₃
- CO below detection limit (0.5 ppm) for all flows
- NOx optimization TBD
- No OEA required

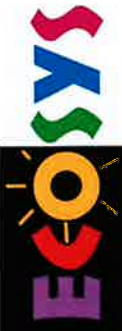
Variable Fuel flow



Variable NF₃ flow



Marathon™ M8500 Abatement Performance – NF₃ Tabular

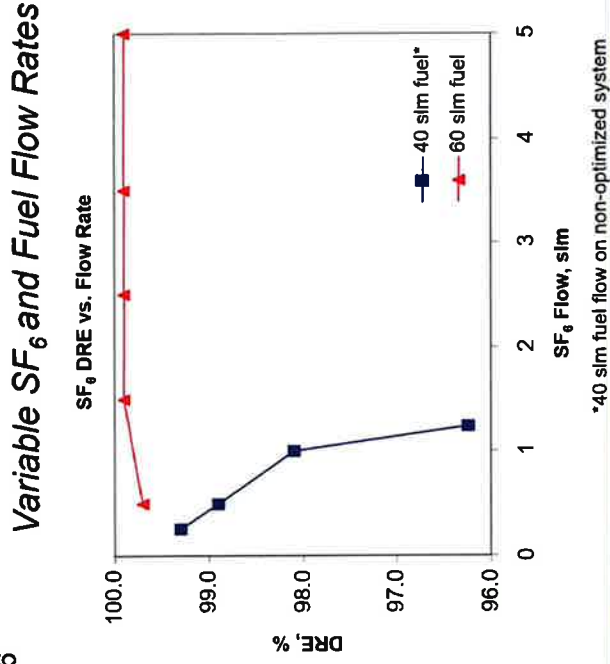


Flow, slm	Total Inlet, slm	Total Fuel, slm	Gas Out, ppm	CO, ppm	NO, ppm	NO ₂ , ppm	DRE, %
0.5	200	30	1.9	ND	217	<20	99.57
0.5	200	31	<0.5	ND	201	<20	>99.89
0.5	200	36	<0.5	ND	171	<20	>99.89
0.5	200	41	<0.5	ND	132	<20	>99.89
0.5	200	46	<0.5	ND	126	<20	>99.89
1	200	33	0.7	ND	385	48	99.92
1.5	200	33	<0.5	ND	506	86	>99.96
2	200	33	<0.5	ND	600	127	>99.97
2.5	200	33	<0.5	ND	681	163	>99.98
3	200	33	<0.5	ND	750	188	>99.98
3.5	200	33	<0.5	ND	817	204	>99.98
4	200	33	<0.5	ND	869	209	>99.99
4.5	200	33	<0.5	ND	925	211	>99.99

SF₆ Abatement

SF₆ abatement efficiency >99% for all flows on optimized system

- Flow rate varied, 0.5-5.0 slm SF₆
- SF₆ Emissions remained below detection limit (1.5 ppm)
- Fuel flow maintained at 60 slm
- No OEA required
- NOx and CO below detection limits



Marathon™ M8500 Abatement Performance – SF₆ Tabular



Flow, slm	Total Inlet, slm	Total Fuel, slm	Gas Out, ppm	CO, ppm	NOx, ppm	DRE, %
0.25	200	40	1.6	ND	ND	99.3
0.5	200	40	4.7	ND	ND	98.9
1.0	200	40	16.6	ND	ND	98.1
1.25	200	40	27.4	ND	ND	97.4
1.25	200	40	34.9	ND	ND	96.8
1.25	200	40	57.0	ND	ND	94.5
0.5	200	50	<1.5	ND	ND	>99.7
0.5	200	60	<1.5	ND	ND	>99.7
1.5	200	60	<1.5	ND	ND	>99.9
2.5	200	60	<1.5	ND	ND	>99.9
3.5	200	60	<1.5	ND	ND	>99.9
5	200	60	<1.5	ND	ND	>99.9



SF₆ & Cl₂ Abatement

Test Results:

- Excellent DRE for both Cl₂ and SF₆ > 99%
- CO emission < 0.5ppm
- HF emission < 1 ppm
- HCl emission < 2ppm

* 2.0 slpm of Cl₂ was run due to limitation in our Application Lab. However, we expect Cl₂ DRE > 99% even up to 8 slpm of Cl₂.

Cl ₂ Flow Rate (slpm)	SF ₆ Flow Rate (slpm)	Total N ₂ Pump Purge (slpm)	Total Fuel Flowrate (slpm)	Cl ₂ Exhaust Conc (ppm)	SF ₆ Exhaust Conc (ppm)	Cl ₂ DRE (%)	SF ₆ DRE (%)
2.0*	5.0	200	70	<20	10	>99	99.7

SF₆ & HCl Abatement

Test Results:

- Excellent DRE for both HCl and SF₆ > 99%
- CO emission < 0.5ppm
- HF emission < 1 ppm
- HCl emission < 2ppm

HCl Flow Rate (slpm)	SF ₆ Flow Rate (slpm)	Total N ₂ Pump Purge (slpm)	Total Fuel Flowrate (slpm)	HCl Exhaust Conc (ppm)	SF ₆ Exhaust Conc (ppm)	HCl DRE (%)	SF ₆ DRE (%)
20	5.0	200	70	<2.0	10	>99	99.7



Thank You!

EcoSys Abatement Values

- We value our customers and aim to provide a superior customer experience with competitive pricing
- We are committed to continuous growth and improvement as an abatement supplier
- We aim to produce and supply exceptional engineered solutions for our customer's challenging requirements

• We strive to adhere to the highest ethical and community standards

EcoSys Abatement Confidential

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EcoSys Abatement Confidential

EXFLUOR RESEARCH CORPRATION
PERMIT APPLICATION NO. 165848
ADDITONAL INFORMATION

SEPTEMBER 2, 2021

Any requests for portions of this application that are marked as confidential must be submitted in writing, pursuant to the Public Information Act, to the TCEQ Public Information Coordinator, MC-197, P.O. Box 13087, Austin, Texas 78711-3087.

Application Exhibit 7A

Response to TCEQ ED Application Questions

**CONFIDENTIAL MATERIALS FILED
SEPARATELY**

Application Exhibit 8


NORI Public Notice Verification Form

**Texas Commission on Environmental Quality
Public Notice Verification Form
Air Permit**


124292-C10

Applicant Name: Exflur Research Corporation	
Site or Facility Name: Exflur Research	
Application Received Date: 07/09/2021	
TCEQ Account Number (if applicable):	Permit Number: 165848
Regulated Entity Number (RN): RN110969227	Customer Number (CN): CN602696791
All applicants must complete all applicable portions of this form. Send this completed form to the TCEQ to the attention of the Office of the Chief Clerk within 10 business days after the end of the designated comment period . For more information regarding public notice, refer to the instructions in the public notice package.	
Alternative Language Checklist	
I have contacted the appropriate school district. <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
School District: Florence ISD	Phone Number: (254) 793-2850
Person Contacted: Human Resources	Date: 07/20/2021
Is a bilingual education program (BEP) required by the Texas Education Code in the district? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
If answer is "NO," skip to first question in verification box on next page. (Note: A BEP is different from "English as a Second Language" (ESL) program; and Elementary/Middle schools that only offer ESL will not trigger notice in an alternative language.)	
Notice in an alternative language is required if a BEP is required in the District, and one of the following conditions is met:	
1. students in the elementary or middle school nearest the facility are enrolled in a program at that school;	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
2. students from the elementary or middle school nearest the facility attend a BEP at another location; or	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
3. the school district that otherwise would be required to provide a BEP has been granted an exception from the requirements to provide the program, as provided for in 19 Texas Administrative Code 89.1207(a).	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
If the answer is "NO" to 1, 2, and 3 above, then alternative language notice is not required.	
The name of the elementary school nearest to the proposed or existing facility is:	
Florence Elementary School	
The name of the middle school nearest to the proposed or existing facility is:	
Florence Middle School	
The following language(s) is/are utilized in the bilingual program:	
Spanish	
If notice in an alternative language is required, then applicants must publish alternative language notice(s) and post alternative language sign(s), as outlined in the <i>Instructions for Public Notice</i> and certify compliance with those requirements on this form.	

**Texas Commission on Environmental Quality
Public Notice Verification Form
Air Permit**

Applicant Name: Exflur Research Corporation	
Site or Facility Name: Exflur Research	
Application Received Date: 07/09/2021	
TCEQ Account Number (if applicable):	Permit Number: 165848
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For more information regarding public notice, refer to the instructions in the public notice package.	
Alternative Language Verification	
1. A BEP is required by the Texas Education Code in the area addressed by this permit application and is subject to alternative language public notice requirements. If "NO," skip 2 through 6 and complete signature, title, date, and name of applicant.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
2. The applicant has conducted a diligent search for a newspaper or publication of general circulation in both the municipality and county in which the facility is located (or proposed to be located).	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
3. A newspaper or publication could not be found in any of the alternative language(s) in which notice is required.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
4. The publishers of the newspaper listed below refused to publish the notice as requested, and another newspaper or publication in the same language and of general circulation could not be found in the municipality or county in which the facility is located (or proposed to be located).	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A
Newspaper: El Mundo	Language: Spanish
5. Proof of publication of the newspaper alternative language notice(s) and the requested affidavits have been sent to the TCEQ.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
6. Alternative language signs were posted as required by the TCEQ.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
This form must be signed and dated by a designated representative acting on behalf of the applicant after the end of the designated comment period. Send this completed form to the TCEQ to the attention of the Office of the Chief Clerk within 10 business days after the end of the designated comment period. The TCEQ will not accept this form if submitted prior to that date.	
Verified by (signature):  Luke Bernhard	
Applicant: Exflur Research Corporation	
Title: EHS Manager	Date: 9/3/2021

**Texas Commission on Environmental Quality
Public Notice Verification Form
Air Permit**

Applicant Name: Exflur Research Corporation	
Site or Facility Name: Exflur Research	
Application Received Date: 07/09/2021	
TCEQ Account Number (if applicable):	Permit Number: 165848
Regulated Entity Number (RN): RN110969227	Customer Number (CN): CN602696791
For more information regarding public notice, refer to the instructions in the public notice package.	
New Source Review Permit Notice Verification (Complete this section, if applicable)	
Proof of publication of the newspaper notices and the requested affidavits have been furnished in accordance with the regulations and instructions of the TCEQ.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Notice of Receipt of Application and Intent to Obtain Permit (1st Notice):	
Required signs (for 1st notice) were posted in accordance with the regulations and instructions of the TCEQ.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
A copy of the administratively complete air quality application, and any revisions, were available for review and copying at the public place indicated below throughout the duration of the public comment period.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
The public place indicated below provides public access to the internet (for PSD, nonattainment, or FCAA 112(g) Permit).	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
Notice of Application and Preliminary Decision (2nd Notice, if applicable):	
A copy of the complete air quality application (including any subsequent revisions to the application), executive director's preliminary decision (which includes the draft permit), the preliminary determination summary and air quality analysis (if applicable), are available for review and copying at the public place indicated below from the first day after newspaper publication, and will remain available until either: (1) the TCEQ acts on the application; or (2) the application is referred to the State Office of Administrative Hearings (SOAH) for hearing	<input type="checkbox"/> Yes <input type="checkbox"/> No
Name of Public Place: Eula Hunt Beck Florence Public Library	
Address of Public Place: 207 E Main St	
City: Florence	State: Texas
ZIP Code: 76527	
This form must be signed and dated by a designated representative acting on behalf of the applicant after the end of the designated comment period. Send this completed form to the TCEQ to the attention of the Office of the Chief Clerk within 10 business days after the end of the designated comment period. The TCEQ will not accept this form if submitted prior to that date.	
Verified by (signature):  Luke Berthoud	
Applicant: Exflur Research Corporation	
Title: EHS Manager	Date: 9/3/2021

**Texas Commission on Environmental Quality
Public Notice Verification Form
Air Permit**

Applicant Name: Exflur Research Corporation		
Site or Facility Name: Exflur Research		
Application Received Date: 07/09/2021		
TCEQ Account Number (if applicable):		Permit Number: 165848
Regulated Entity Number (RN): RN110969227		Customer Number (CN): CN602696791
For more information regarding public notice, refer to the instructions in the public notice package.		
Federal Operating Permit (Title V) Notice Verification (Complete this section, if applicable)		
I verify that the required signs were posted in accordance with the regulations and instructions of the TCEQ.		<input type="checkbox"/> Yes <input type="checkbox"/> No
I verify that proof of publication of the newspaper notices and the requested affidavits have been furnished in accordance with the regulations and instruction of the TCEQ.		<input type="checkbox"/> Yes <input type="checkbox"/> No
I verify that a copy of the complete air quality application (including any subsequent revisions to the application) and draft permit were available for review and copying at the public place indicated below throughout the duration of the public comment period.		<input type="checkbox"/> Yes <input type="checkbox"/> No
Name of Public Place:		
Address of Public Place:		
City:	State:	ZIP Code:
<p>This form must be signed and dated by a designated representative acting on behalf of the applicant after the end of the designated comment period. Send this completed form to the TCEQ to the attention of the Office of the Chief Clerk within 10 business days after the end of the designated comment period. The TCEQ will not accept this form if submitted prior to that date.</p>		
Verified by (signature):  Luke Bernhard		
Applicant: Exflur Research Corporation		
Title: EHS Manager	Date: 9/3/2021	

PRINT FORM

RESET FORM

For TCEQ Use Only

**Permit Application Routing and Summary Sheet
Air Permits**

This sheet should accompany all notices to be processed by the office of the chief clerk on the left side of the file folder.

Name of applicant: Exfluor Research Corporation	
Facility/ Site name: Exfluor Research	
TCEQ permit number: 165848	
Application received date: July 9, 2021	
Customer reference number: CN602696791	
Regulated entity number: RN110969227	
County: Williamson	Region: 11
Local program 1:	Local program 2:
Permit type: Permit Application	
Internal program routing	
Tech. team leader: Mr. Joel Stanford	Phone no. (512) 239-0270
APIRT team leader: Johnny Bowers	Date: July 14, 2021
Administratively reviewed by: Steve Piper	Phone no. (512) 239-1589
Administratively complete date:	July 14, 2021
Public viewing location must have internet access: <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
Is 2nd public notice required: <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
*709 applies	

For TCEQ Use Only

Applicant and Contact Information

This sheet should accompany all notices to be processed by the office of the chief clerk on the right side of the file folder.

Applicant's main contact and address to be shown on permit:	
Name/Title: Thomas Bierschenk PHD, Vice President	
Company: Exfluor Research Corporation	
Street/Road: 2350 Double Creek Dr	
City/State/Zip: Round Rock, TX 78664-3801	
Telephone: (512) 310-9044	Fax: (512) 310-9045
Applicant's technical representative/ consultant:	
Name/Title: Luke Bernhard, EHS Manager	
Company: Exfluor Research Corporation	
Street/Road: 2350 Double Creek Dr	
City/State/Zip: Round Rock, TX 78664-3801	
Phone: (512) 310-9044	Fax: (512) 310-9045
Person responsible for publishing notice:	
Name/Title: Thomas Bierschenk PHD, Vice President	
Company: Exfluor Research Corporation	
Street/Road: 2350 Double Creek Dr	
City/State/Zip: Round Rock, TX 78664-3801	
Telephone: (512) 310-9044	Fax: (512) 310-9045

Paul Worrall

From: luke.bernhard@exfluor.com
Sent: Tuesday, September 7, 2021 8:02 AM
To: PROOFS; R6AirPermitsTX@EPA.gov; Joel Stanford
Subject: Exfluor Public Notice Verification Form
Attachments: Exfluor Research_20244.PDF; Exfluor Summary Sheet.PDF

Please see attached Public Notice Verification Form TCEQ-20244. Please let me know if you have any questions.

Luke Bernhard
Exfluor Research
EHS Manager
Round Rock, Texas
C: 512-762-6622
O: 512-310-9044
exfluor.com



Virus-free. www.avast.com

Application Exhibit 9

Response to TCEQ ED Request for Information

From: Joerg Windolph
Sent: Monday, October 18, 2021 1:37 PM
To: Cara Hill <Cara.Hill@Tceq.Texas.Gov>
Cc: arloe.fontenot@exfluor.com; biershenk_t@exfluor.com
Subject: Exfluor Research Corporation - Permit No. 165848 Application

Cara,

On behalf of Exfluor Research, I am submitting a response to your questions regarding Permit 165848 that you sent to Exfluor on October 5, 2021. Modeling input and output files, the modeling scaling analysis, and an updated EMEW are submitted via TCEQs secure ftp site. Please let us know if you have any other questions or comments.

Thank you,

Joerg Windolph, P.E.
Principal Engineer

Waid Environmental

13785 Research Blvd., Suite 100

Austin, Texas 78750

Office: 512-255-9999

Cell: 512-550-8147

<http://www.waid.com>

Privilege and Confidentiality Notice

The following electronic message contains information that should be treated as confidential or privileged. The information is intended to be for the use of the individual or entity named above. If you are not the intended recipient, be aware that any disclosure, copying, distribution or use of the contents of this message is prohibited. If you have received this electronic message in error, please notify us immediately by telephone at (512) 255-9999.



October 18, 2021

Ms. Cara Hill
Air Permits Division, MC 163
Texas Commission on Environmental Quality
P.O. Box 13087
Austin, TX 78711-3087

Submitted via Email

Re: Exfluor Research Corporation
Permit Application No. 165848
Regulated Entity No. RN110969227
Customer No. CN602696791
TCEQ Project No. 331049

Dear Ms. Hill:

On behalf of Exfluor Research Corporation (Exfluor), I am submitting the attached response to your request for information dated October 5, 2021. Detailed responses for each of the items you requested are included in the following attachments.

Attachment 1: Detailed Responses to October 5, 2021 Additional Information Request Letter
Attachment 2: Refined Modeling Analysis

Should you have any questions regarding this submittal or require additional information, please do not hesitate to contact Arloe Fontenot at (512) 310-9044.

Sincerely,

A handwritten signature in blue ink, appearing to read "Joerg Windolph".

Joerg Windolph, P.E.
Principal Engineer

JOW/tpv

Attachments

cc: Air Program Director, TCEQ Region 11, Austin, w/attachments

Austin Office

13785 Research Blvd., Suite 100, Austin, Texas 78750
512.255.9999 • 512.255.8780 FAX

Houston Office

1325 Space Park Dr., Suite D, Houston, Texas 77058
281.333.9990 • 512.255.8780 FAX

APP-00321

ATTACHMENT 1
RESPONSES TO E-MAILED QUESTIONS

The information in this attachment is in response to the request for information dated October 5, 2021. The questions appear below in bold font, followed by Exfluors' response in normal font.

- 1. Please submit a demonstration that emissions from the site will not cause or contribute to a violation of any National Ambient Air Quality Standards or state property line standard for sulfur compounds in accordance with 30 TAC §112. Please include emission rates as normal production and planned MSS for the site, including any emissions to be authorized under PBR for this project.**

Exfluors' Response

A demonstration that emissions from the site will not cause or contribute to a violation of any National Ambient Air Quality Standards or state property line standard for sulfur compounds in accordance with 30 TAC §112 is not required. There will be no sulfur compounds emitted from the routine operations from the Florence site.

At this point Exflur has not determined what activities will be included in future PBRs for planned MSS at the site. Emissions including emissions from sulfur compounds from potential future MSS activities have not been quantified.

- 2. Please submit the refined modeling required by the MERA analysis to demonstrate that the project will not endanger public health. Please include emission rates as normal production and planned MSS, including those to be authorized under PBR. Also, if any updates to the emission rates used in the MERA analysis submitted with the application are required, please submit an updated MERA analysis, including any emissions to be authorized under PBR for this project.**

Exfluors' Response

An updated refined air dispersion modeling analysis is attached. The updated analysis is based on routine facility emissions that were submitted on September 2, 2021. Planned MSS activities and any associated emissions have not been quantified and are not included in the updated refined modeling analysis.

ATTACHMENT 2
REFINED MODELING ANALYSIS

Texas Commission on Environmental Quality
Initial Permit Amendment Application
Air Quality Modeling Analysis

Permit Application No. 165848
TCEQ Project No. 331049

Exflur Research Corporation
Florence Site

Florence, Williamson County
Air Quality Account ID No. TBD
Regulated Entity No. RN110969227
Customer No. CN602696791

October 2021

Prepared by:




Steven DeNero
Senior Air Dispersion Modeler

Approved by:



Joerg Windolph, P.E.
Principal Engineer



10/18/2021

Waid Corporation dba Waid Environmental
Certificate of Registration No. F-58

Document based on information provided by
Exflur Research Corporation
Waid Project No. EXF14242



Austin Office

13785 Research Blvd., Suite 100, Austin, Texas 78750
512.255.9999 • 512.255.8780 FAX

Houston Office

1325 Space Park Dr., Suite D, Houston, Texas 77058
281.333.9990 • 512.255.8780 FAX

TABLE OF CONTENTS

<u>SECTION</u>	<u>DESCRIPTION</u>
1.0	PLOT PLAN
2.0	AREA MAP
3.0	MODELING RESULTS
4.0	ELECTRONIC INFORMATION

APPENDIX – EMISSIONS SUMMARY TABLES AND MODELED RELEASE PARAMETERS

SECTION 1.0

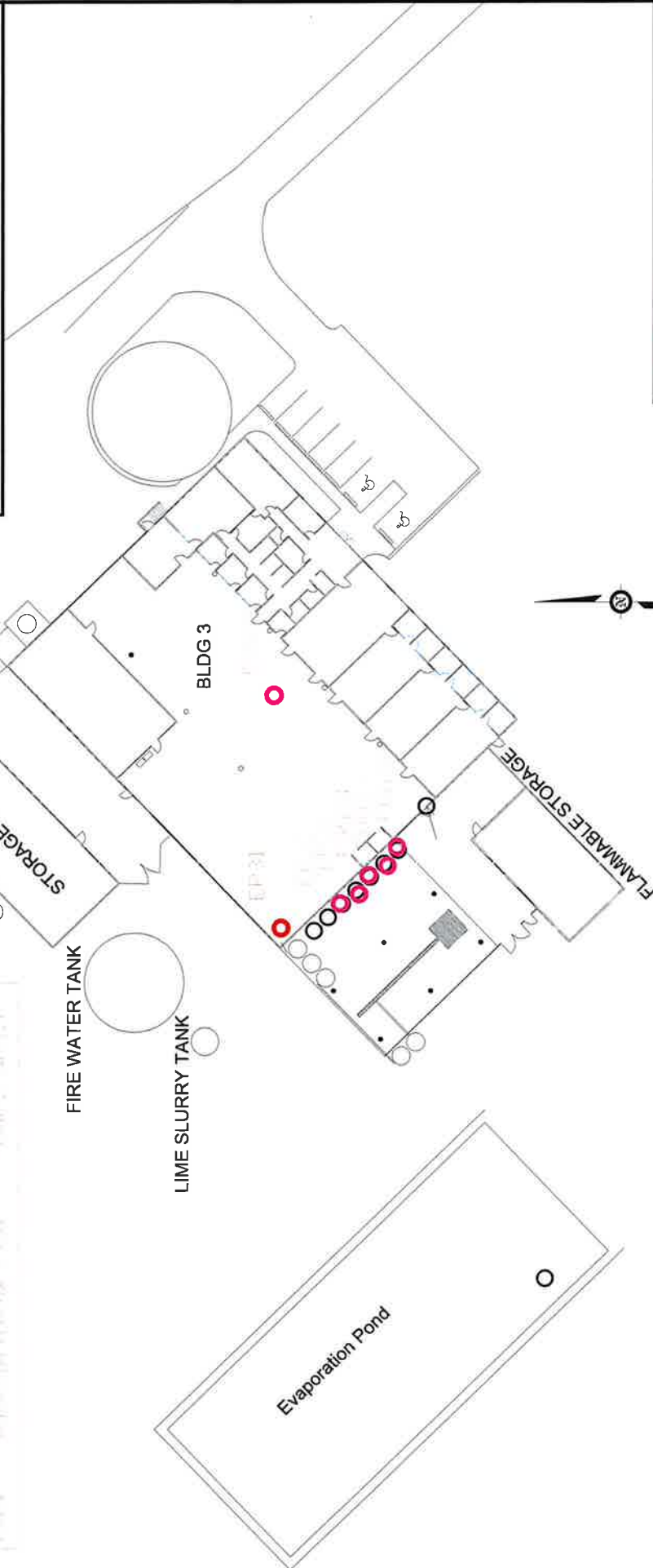
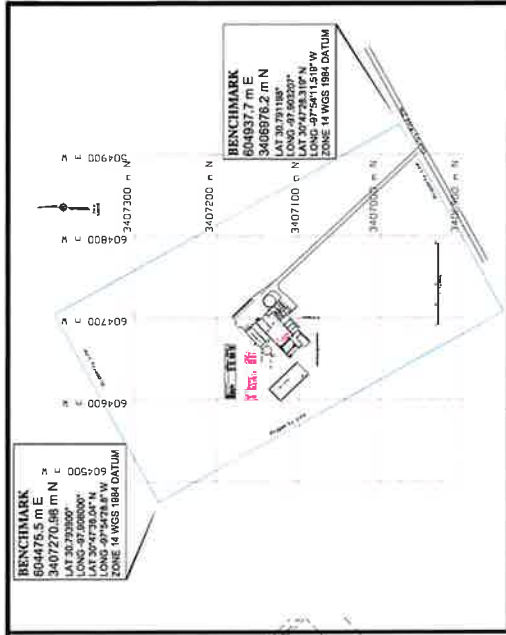
PLOT PLAN

The plot plan of the Florence Site includes a clearly marked scale, all property lines, all emission points associated with the project analysis, a true north arrow, reference UTM coordinates, and all buildings and structures which could create downwash effects for the emission points associated with the project analysis.

The property lines indicated on the map represent the extents of Florence Site's property. The UTM coordinates are based on North American Datum (NAD83) system. The lengths, widths, and heights of the structures included in this AQA are all summarized in a table on the plot plan, and an electronic file summarizing their heights has been submitted with the modeling input/output files via the TCEQ's FTP website.

Downwash Structure Name	Height (feet)	Height (meters)	Dimensions (meters)
BLDG 3	30.0	9.14	41.66 x 34.79
FIRE WATER TANK	16.0	4.88	Diameter 10.49
FLAMMABLE STORAGE	16.0	4.88	Diameter 15.13 x 8.20
LIME SLURRY TANK	10.0	3.05	Diameter 2.95
STORAGE BLDG	16.0	4.88	24.82 x 9.90

Emission Point Number	Name	Location Easting, Northing (meters)
EP31	EXHAUST GAS VENT SYSTEM W RAINCAP	604666, 3407123



WAD AND ASSOCIATES
 EXFLUOR RESEARCH CORPORATION
 ROUND ROCK FACILITY

Drawn By	DMW	Check Date	2/7/08	Issue No.	7/1/21	Sheet No.	5
Project No.	H:\CLIENTS\EXFLUOR\EXF14242\ACAD			MDPLD11			

SECTION 2.0

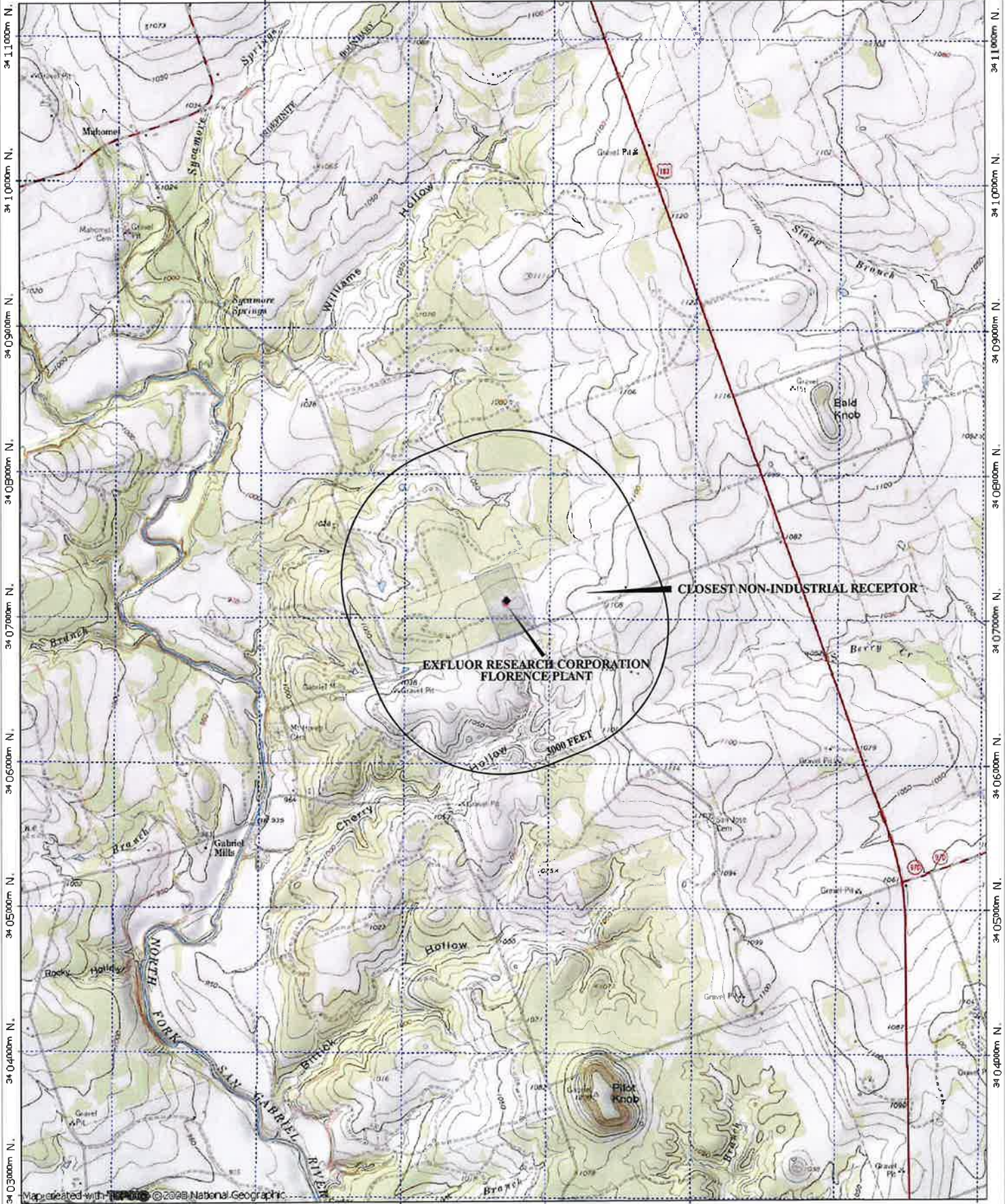
AREA MAP

The following area map provides an aerial view of the Florence Site and surrounding land-use. Identified in the following map are the plant's property boundaries, the closest non-industrial receptor, and a 3,000-ft radius from the plant.

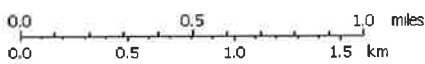
There are no schools located within 3,000 feet of the property line.

30°47'33" N, 97°54'21" W WGS84 1964 Mahomet, TX

602000m E. 603000m E. 604000m E. 605000m E. 606000m E. 607000m E.



Map created with TopoGIS © 2009 National Geographic. 602000m E. 603000m E. 604000m E. 605000m E. 606000m E. WGS84 Zone 14R 608000m E.



WALD ENVIRONMENTAL
 EXP14242MDLAREAMAP.DWG

TN
 3 1/2°
 12/02/20

APP-00329

Aerial Image

Satellite Image of the Florence Site location and surrounding land-use. The Florence site is surrounded to the West, North, and South by forested land, and possibly-agricultural land to the East.



Aerial Image with Full Receptor Grid

Satellite image of the Florence Site location and surrounding land-use. The Florence site is surrounded to the West, North, and South by forested land, and possibly-agricultural land to the East.

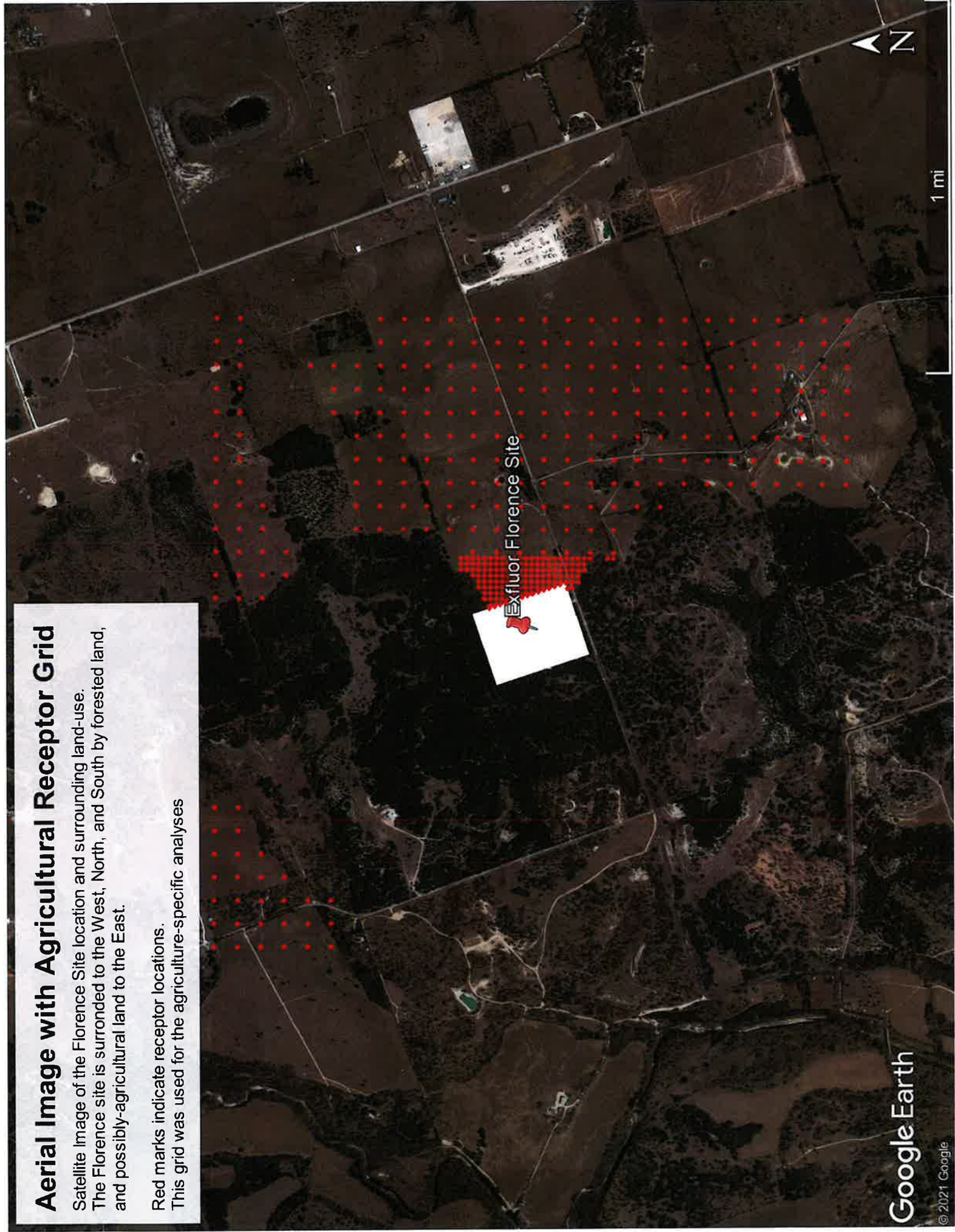
Red marks indicate receptor locations.



Aerial Image with Agricultural Receptor Grid

Satellite Image of the Florence Site location and surrounding land-use. The Florence site is surrounded to the West, North, and South by forested land, and possibly-agricultural land to the East.

Red marks indicate receptor locations. This grid was used for the agriculture-specific analyses



SECTION 3.0

MODELING RESULTS

3.1 Evaluation Summary

The project proposes to authorize 170 unique chemicals emitted from ten sources. Of these 170 chemicals:

- Three of these are labeled 'Simple Asphyxiants' and are listed on TCEQ's Toxicology Screening List in Appendix B of the MERA Guidance Document¹. This leaves 167 chemicals for further analysis.
- Of these 167, two are known criteria pollutants (Nitrogen Oxides [NO_x] and Carbon Monoxide [CO]). Additionally, the project includes emissions of Butylated Hydroxytoluene, which is to be treated as particulate matter under 10 microns in diameter [PM₁₀] per Toxicology guidance. These three pollutants are analyzed following the minor NAAQS analysis framework. This leaves 164 non-criteria pollutants to be analyzed in the State Health Effects Analysis framework.
- Of these 164 non-criteria pollutants, 18 have an established effects screening level (ESL) available from TCEQ's TAMIS website². An additional 10 non-criteria pollutants have ESL values provided by the TCEQ Toxicology department in an email to Exflur Research Corporation in 2008. This leaves 136 pollutants without established ESLs.
- Following the MERA guidance document, these 136 pollutants are not included in the State Health Effects Analysis in this report.

3.2 Ambient Secondary PM_{2.5} Formation

This project proposes increases in annual emissions of NO_x, which is a precursor pollutant for atmospheric formation of PM_{2.5}. With the November 2019 release of the TCEQ Air Quality Modeling Guidelines, any project that proposes an increase in NO_x and/or SO₂ must evaluate secondary PM_{2.5} impacts.

This analysis uses EPA's Modeled Emission Rates for Precursor (MERP) Tier 1 approach to quantify the impact of secondary PM_{2.5} formed in the atmosphere from this project's proposed increases of NO_x and/or SO₂. The equation below outlines the procedure for this determination.

$$PM_{2.5} \text{ Secondary Concentration} = \left(\frac{NO_x ER}{NO_x MERP} + \frac{SO_2 ER}{SO_2 MERP} \right) * SIL$$

The worst-case MERP values were used for this report in lieu of justifying a less conservative option. The calculated values of PM_{2.5} formation for this project are:

Calculated Secondary Formation of PM_{2.5}

Precursor Pollutant	Project Increase	MERP Value		Secondary PM _{2.5} Formation (µg/m ³)	
		24-hour	Annual	24-hour	Annual
NO _x	0.132 tons/yr	2,649	10,397	<1E-4	<1E-4

1 <https://www.tceq.texas.gov/assets/public/permitting/air/Guidance/NewSourceReview/mera.pdf>

2 <https://www17.tceq.texas.gov/tamis/index.cfm?fuseaction=home.welcome>

3.3 Minor NAAQS Analysis – Preliminary Impacts Determination

The impacts of project proposed emissions of NO_x, CO, PM₁₀, and PM_{2.5}, and Butylated Hydroxytoluene (surrogated and combined into the PM₁₀ analysis) are provided in the table below. All impacts are below the established significant impact levels. All of these impacts were determined through an impacts scaling exercise, which is included at the end of this section. This analysis also assumed a conservative 100% conversion of NO_x to NO₂.

This minor NAAQS analysis is now complete.

Preliminary Impacts Determination

Pollutant	Averaging Time	SIL (µg/m³)	1-Yr Max (µg/m³)	Impacts Below SIL?
CO	1-Hour	2000	9.62	TRUE
CO	8-Hour	500	2.75	TRUE
NO ₂	1-Hour	7.5	7.0	TRUE
NO ₂	Annual	1	0.13	TRUE
PM ₁₀	24-Hour	5	0.07	TRUE
Primary PM _{2.5}	24-Hour	1.2	0.07	TRUE
Primary PM _{2.5}	Annual	0.2	0.01	TRUE
Secondary PM _{2.5}	24-Hour	1.2	<1E-4	TRUE
Secondary PM _{2.5}	Annual	0.2	<1E-4	TRUE
Total PM _{2.5}	24-Hour	1.2	0.07	TRUE
Total PM _{2.5}	Annual	0.2	0.01	TRUE

Minor NAAQS Preliminary Impacts Determination

Modeled Rates for Emission Sources

Proposed Total Emission Rates per EPN

EPN	NO _x		CO (lb/hr)	PM ₁₀ ¹ (lb/hr)	PM _{2.5}	
	(lb/hr)	(ton/yr)			(lb/hr)	(ton/yr)
EP3-1	0.030	0.132	0.042	3.78E-03	3.78E-03	1.66E-02
EP3-2	-	-	-	-	-	-
EP3-3	-	-	-	-	-	-
EP3-4	-	-	-	-	-	-
EP3-5	-	-	-	-	-	-
FUG3-1	-	-	-	-	-	-
FUG3-2	-	-	-	-	-	-
FUG3-3	-	-	-	-	-	-
FUG3-4	-	-	-	-	-	-
FUG3-5	-	-	-	-	-	-

1: Emissions of Butylated Hydroxytoluene are treated as PM₁₀ per Toxicology ESL database.

AERMOD UIM Output

EPN	Unit Impact (µg/m ³)/(1 lb/hr)			
	1-hr	8-hr	24-hr	Annual
EP3-1	154.4	44.1	19.6	2.8

Preliminary Impacts Determination - Scaling Summary

Pollutant	Averaging Time	SIL (µg/m ³)	1-Yr Max (µg/m ³)	Impacts Below SIL?
CO	1-Hour	2000	6.41	TRUE
CO	8-Hour	500	1.83	TRUE
NO ₂	1-Hour	7.5	4.67	TRUE
NO ₂	Annual	1	0.09	TRUE
PM ₁₀	24-Hour	5	7.40E-02	TRUE
Primary PM _{2.5}	24-Hour	-	7.40E-02	-
Primary PM _{2.5}	Annual	-	1.08E-02	-
Secondary PM _{2.5}	24-Hour	-	9.01E-05	-
Secondary PM _{2.5}	Annual	-	3.83E-06	-
Total PM _{2.5}	24-Hour	1.2	7.41E-02	TRUE
Total PM _{2.5}	Annual	0.2	1.08E-02	TRUE

Sample Calculation:

$$\begin{aligned}
 \text{EP3-1 1-hour NO}_2 \text{ Impacts} &= \text{EP3-1 NO}_x \text{ Emissions} * \text{1-hour EP3-1 UIM} * \text{1:1 Ratio NO}_x/\text{NO}_2 \\
 &= 0.030 \text{ lbs/hr} * 154.37 \text{ µg/m}^3 \text{ per lb/hr} \\
 &= 4.668 \text{ µg/m}^3
 \end{aligned}$$

$$\begin{aligned}
 \text{EP3-1 Annual NO}_2 \text{ Impacts} &= \text{EP3-1 NO}_x \text{ Emissions} * \text{Annual EP3-1 UIM} * \text{2000/8760} * \text{1:1 Ratio NO}_x/\text{NO}_2 \\
 &= 0.132 \text{ lbs/hr} * 2.85 \text{ µg/m}^3 \text{ per lb/hr} * \text{2000/8760} \\
 &= 0.086 \text{ µg/m}^3
 \end{aligned}$$

3.4 State Health Effects Analysis

The TCEQ's MERA guidance document was used to determine the scope of modeling and effects review for the project allowable emissions increases of non-criteria pollutants. The 28 affected pollutants with established ESLs for this analysis are presented in the table below, along with their respective short-term and long-term ESLs (STESL, LTESL).

Non-Criteria Pollutants and Respective Effects Screening Levels

Pollutant Name	CAS No.	ESL Source	STESL (µg/m3)	LTESL (µg/m3)
Hydrogen Fluoride	7664-39-3	TAMIS	18.00	8.70
Hydrogen Fluoride (Agriculture)	7664-39-3	TAMIS	3.00	0.60
Hydrogen Fluoride (Agriculture with Cattle)	7664-39-3	TAMIS	n/a	0.75
Difluorine	7782-41-4	TAMIS	2.00	0.20
Carbonyl Fluoride	353-50-4	TAMIS	17.00	8.10
Carbonyl Fluoride (Agriculture)	353-50-4	TAMIS	2.80	0.57
Carbonyl Fluoride (Agriculture with Cattle)	353-50-4	TAMIS	n/a	0.71
Trifluoroacetic acid	76-05-1	TAMIS	17	8.1
Trifluoroacetic acid (Agriculture)	76-05-1	TAMIS	2.80	0.57
Trifluoroacetic acid (Agriculture with Cattle)	76-05-1	TAMIS	n/a	0.71
Perfluorohexane	355-42-0	TAMIS	10000	1000
Perfluoroheptane	335-57-9	TAMIS	200	20
Methanol	67-56-1	TAMIS	3900	2100
Isopropyl Alcohol	67-63-0	TAMIS	4920	492
Perfluorooctanoic acid	335-67-1	TAMIS	0.05	0.01
Bromine	7726-95-6	TAMIS	7.0	0.70
Toluene	108-88-3	TAMIS	4500.00	1200
Butylated Hydroxytoluene	128-37-0	TAMIS	Must Meet NAAQS	Must Meet NAAQS
Acrylic Acid	79-10-7	TAMIS	60	6
Hydrogen Chloride	7647-01-0	TAMIS	190	7.9
Ethyl acetate	141-78-6	TAMIS	3100	1440
1,1,2-Trichloro-1,2,2-trifluoroethane	76-13-1	TAMIS	38000	3800
Perfluoropropane	76-19-7	TAMIS	10000	1000
Carbon tetrafluoride	75-73-0	TAMIS	1800	1800
Tetrahydrofuran	109-99-9	TAMIS	1500	150
Hydrogen Bromide	10035-10-6	TAMIS	100	10
Acetyl Fluorides	354-34-7	2008 Email	200	20
Perfluorodecyl fluoride	594-98-9	2008 Email	200	20

Pollutant Name	CAS No.	ESL Source	STESL (µg/m ³)	LTESL (µg/m ³)
Perfluoro (bis-2-chloroethoxy methane)	130085-19-7	2008 Email	200	20
Perfluorooctane	307-34-6	2008 Email	20000	2000
Perfluorodecalin	306-94-5	2008 Email	200	20
Perfluoro-tert-butanol	2378-02-1	2008 Email	1000	100
Perfluorodecanoic acid	335-76-2	2008 Email	14	1.4
polymers of chlorotrifluoroethylene (PCTFE)	9002-83-9	2008 Email	1000	100
Perfluoro-t-butylcyclohexane	84808-64-0	2008 Email	200	20

The following steps detail the evaluation of these pollutants, and the chart at the end of this section presents the MERA analysis steps:

- Step 1:** Not Applicable. The net change in emissions for all pollutants was > 0. The evaluation proceeds to Step 2 for all other chemicals.
- Step 2:** The project proposed allowable emissions fall within the de minimis levels for the following pollutants: carbonyl fluoride, carbonyl fluoride for permitting in agricultural areas, Trifluoroacetic acid, Trifluoroacetic acid for permitting in agriculture areas, Perfluorohexane, Isopropyl Alcohol, Toluene, Acrylic Acid, Ethyl acetate, 1,1,2-Trichloro-1,2,2-trifluoroethane, Perfluoropropane, Tetrahydrofuran, Hydrogen Bromide, Acetyl Fluorides, Perfluorodecyl fluoride, Perfluorooctane, Perfluoro-tert-butanol, Perfluorodecanoic acid, and Perfluoro-t-butylcyclohexane. The evaluation is complete for these chemicals. For all other chemicals, the evaluation proceeds to Step 3.
- Step 3:** A unit impact scaling analysis was conducted on the proposed increases of all remaining pollutants. This unit impact analysis creates a conservatively high GLC_{MAX} value as the maximum concentration predicted is irrespective of time or space of an individual unit's impact. The results of this analysis step are included in the following table.
- The calculated hourly GLC_{MAX} concentrations (and annual GLC_{MAX} concentrations when required by the MERA guidelines) from this unit impact analysis are based on AERMOD modeling results. The concentrations presented are below 10% of the ST and LT ESLs for Methanol, Perfluorooctanoic acid, Hydrogen Chloride, Carbon tetrafluoride, and Perfluoro (bis-2-chloroethoxy methane). The health effects evaluation is therefore complete for these chemicals. The evaluation of the remaining chemicals proceeds to Step 4.
- Steps 4-6:** This analysis skips Steps 4-6 and proceeds straight to Step 7.
- Step 7:** This is an initial permit application for a new facility. Therefore, the proposed emission rates of this permit application represent the site-wide emission rates for these pollutants. The impacts determined from the Step 3 scaling analysis are now compared to the total ESL thresholds. When this conservative comparison is performed, the estimated impacts are below the total ESL

threshold for the following pollutants: Hydrogen Fluoride, Hydrogen Fluoride (Agriculture with Cattle), Carbonyl Fluoride (Agriculture with Cattle), Trifluoroacetic acid (Agriculture with Cattle), Perfluoroheptane, Bromine, Perfluorodecalin, and polymers of chlorotrifluoroethylene (PCTFE).

There are only two pollutants within this analysis whose impacts from the conservative UIM scaling approach do not fall under the respective ESLs. The remainder of this section discusses the pollutant-specific modeling performed and the resultant impacts.

Hydrogen Fluoride (for air permit reviews in agricultural areas)

Chemical-specific modeling was performed for the proposed emissions of Hydrogen Fluoride (HF) in agricultural areas. This respective ESL is only relevant in areas with agricultural processes. Exflur is unaware of any agricultural industry in the immediate vicinity of the proposed Florence Site, as most of the land appears to be uninhabited and undeveloped. However, to be conservative in this analysis, aerial satellite imagery of the surrounding lands was used to survey forested vs. non-forested land. All non-forested, non-road lands that fell within the original receptor grid footprint were considered potentially-agricultural. This includes the property immediately adjacent to the Florence Site’s Eastern boundary. Using this agriculture-specific receptor grid, the following impacts were found for the proposed HF emissions.

Site-wide Modeling Results – Hydrogen Fluoride in Agricultural Areas

Description	GLC_{MAX}	GLC_{VINEYARD}
Concentration	3.85 µg/m ³	1.92 µg/m ³
UTM Location	604867.89, 3407174.21	605011.00, 3407134.00
Max Hours Above 1XESL	29 hours	0 hours
Max Hours Above 2XESL	0 hours	0 hours
Max Hours Above 4XESL	0 hours	0 hours

AERMOD output predicts the Agriculture-based ESL would be exceeded up to 29 hours per year. Aerial imagery and “street-view” imagery of the land east of the Florence Site indicates a small vineyard was recently established. This is identified on the plot included at the end of this section, and is also specifically called out in the table above. Impacts of HF are not expected to exceed the ESL at this vineyard.

As shown in the contour plot included at the end of this section, the ESL-exceeding impacts of HF are limited to <50 meters off-property along the Eastern edge of the Florence Site.

Difluorine

Chemical-specific modeling was performed for the proposed emissions of Difluorine. The table below provides the model-predicted impacts of this analysis. The full receptor grid was used for this analysis.

Site-wide Modeling Results – Difluorine

Description	GLC_{MAX}	GLC_{NI}
Concentration	3.87 µg/m ³	0.49 µg/m ³
UTM Location	604562.85, 3407070.82	605261.00, 3407184.00
Max Hours Above 1XESL	105 hours	0 hours
Max Hours Above 2XESL	0 hours	0 hours
Max Hours Above 4XESL	0 hours	0 hours

Impacts of Difluorine are expected to reach a maximum concentration at ground level of 3.87 µg/m³ along the Western property boundary of the Florence Site. The Western boundary is wooded and not developed and the chances of someone being exposed to these concentrations is very low. ESL-exceeding concentrations of Difluorine are expected to extend to all four sites of the property. As shown in the contour plot provided at the end of this section, the range of ESL-exceeding concentrations is limited to the close vicinity of the plant, and will not extend either to County Road 236 to the South of the Florence Site, nor out to any non-industrial structures.

Exflur Research Corporation believes that these impacts are acceptable given the remote location of this facility, and the limited spread of the pollutants' plumes. This health effects analysis is now complete.

State Health Effects Analysis
 TCEQ Modeling and Effects Review Analysis Logical Hierarchy (APDG 5874) (March 2018)

Qualifying Information		Hydrogen Fluoride	Hydrogen Fluoride (Agriculture)	Hydrogen Fluoride (Agriculture with Cattle)	Diffluorine
Pollutant Name		7664-39-3	7664-39-3	7664-39-3	7782-41-4
CAS No.		18	3	n/a	2
Short-Term ESL ($\mu\text{g}/\text{m}^3$)		8.7	0.6	0.75	0.2
Long-Term ESL ($\mu\text{g}/\text{m}^3$)		0.134	0.134	0.134	0.103
Net Change in Hourly Emissions (lb/hr)		0.585	0.585	0.585	0.453
Net Change in Annual Emissions (TPY)		0.134	0.134	0.134	0.103
Total Hourly project increases (increase-only) (lbs/hr)		0.585	0.585	0.585	0.453
Total Annual project increases (increase-only) (tons/yr)		0.134	0.134	0.134	0.103
Total Hourly PTE project production increases only (tons/yr)		0.585	0.585	0.585	0.453
Total Annual PTE project production increases only (tons/yr)		0.134	0.134	0.134	0.103
Total Hourly PTE project MSS increases (lbs/hr)		0.585	0.585	0.585	0.453
Total Annual PTE project MSS increases (tons/yr)		-	-	-	-

Modeling and Effects Review Applicability (MERA) Guideline Steps

1	Is the net change in emissions ≤ 0 ?	No	No	No	No
2	De Minimis Increase * Is the LTESL $\geq 10\%$ STESL? * Does this project involve MSS emission increases? * Do MSS emissions overlap with Routine Production Emissions? ** Are hourly Production / PTE increases ≤ 0.04 lb/hr and STESL = [2, 500]? ** Are hourly Production / PTE increases ≤ 0.1 lb/hr and STESL = [500, 3500]? ** Are hourly Production / PTE increases ≤ 0.4 lb/hr and STESL ≥ 3500 ? *** Are hourly MSS increases ≤ 0.1 lb/hr and STESL = [2, 3500]? *** Are hourly MSS increases ≤ 0.4 lb/hr and STESL ≥ 3500 ?	Yes No No No No No -	Yes No No No No No -	No No No No No No -	No Yes No No No No -
3	Summed Unit-Impact Concentration * 10% of Short-term ESL ($\mu\text{g}/\text{m}^3$) * Hourly GLC_{MAX} concentration ($\mu\text{g}/\text{m}^3$) (AERMOD UJM) * Is Hourly $\text{GLC}_{\text{MAX}} \leq 10\%$ STESL? * Is the LTESL $\geq 10\%$ STESL? * 10% of Long-term ESL ($\mu\text{g}/\text{m}^3$) * Max annual off-property concentration ($\mu\text{g}/\text{m}^3$) (AERMOD UJM) * Is Annual $\text{GLC}_{\text{MAX}} \leq 10\%$ STESL?	1.8 5.856 No -	0.3 4.013 No -	- - - -	0.2 3.873 No -
7	Conduct Site-wide Modeling and submit Air Quality Analysis * Short-term ESL ($\mu\text{g}/\text{m}^3$) * Hourly GLC_{MAX} concentration ($\mu\text{g}/\text{m}^3$) (UJM or Chemical-Specific Modeling) * Is Hourly $\text{GLC}_{\text{MAX}} \leq \text{STESL}$? * Long-term ESL ($\mu\text{g}/\text{m}^3$) * Annual GLC_{MAX} concentration ($\mu\text{g}/\text{m}^3$) (AERMOD UJM) * Is Annual $\text{GLC}_{\text{MAX}} \leq \text{LTESL}$?	Pending 18 5.856 Yes - Step 8 -	Pending 3 3.848 No -	Pending - - 0.267 -	Pending 2 3.875 No -
8	Scope of MERA evaluation is complete.	Complete	Complete	Complete	Complete

State Health Effects Analysis
 TCEQ Modeling and Effects Review Analysis Logical Hierarchy (APDG 5874) (March 2018)

Qualifying Information		Carbonyl Fluoride	Carbonyl Fluoride (Agriculture)	Carbonyl Fluoride (Agriculture with Cattle)	Trifluoroacetic acid
Pollutant Name					
CAS No.		353-50-4	353-50-4	353-50-4	76-05-1
Short-Term ESL ($\mu\text{g}/\text{m}^3$)		17	2.8	n/a	17
Long-Term ESL ($\mu\text{g}/\text{m}^3$)		8.1	0.57	0.71	8.1
Net Change in Hourly Emissions (lb/hr)		0.012	0.012	0.012	0.014
Net Change in Annual Emissions (TPY)		0.053	0.053	0.053	0.061
Total Hourly project increases (increase-only) (lbs/hr)		0.012	0.012	0.012	0.014
Total Annual project increases (increase-only) (tons/yr)		0.053	0.053	0.053	0.061
Total Hourly PTE project production increases only (lbs/hr)		0.012	0.012	0.012	0.014
Total Annual PTE project production increases only (tons/yr)		0.053	0.053	0.053	0.061
Total Hourly PTE project MSS increases (lbs/hr)		-	-	-	-
Total Annual PTE project MSS increases (tons/yr)		-	-	-	-

Modeling and Effects Review Applicability (MERA) Guideline Steps		1	2	3	7	8
1	Is the net change in emissions ≤ 0 ?	No	No	No	No	No
2	De Minimis Increase * Is the LTESL $\geq 10\%$ STESL? * Does this project involve MSS emission increases? * Do MSS emissions overlap with Routine Production Emissions? ** Are hourly Production / PTE increases ≤ 0.04 lb/hr and STESL = [2, 5000]? ** Are hourly Production / PTE increases ≤ 0.1 lb/hr and STESL = [500, 3500]? ** Are hourly Production / PTE increases ≤ 0.4 lb/hr and STESL ≥ 3500 ? *** Are hourly MSS increases ≤ 0.1 lb/hr and STESL = [2, 3500]? *** Are hourly MSS increases ≤ 0.4 lb/hr and STESL ≥ 3500 ?	Yes	Yes	Yes - Step 8	No	Yes - Step 8
3	Summed Unit-Impact Concentration * 10% of Short-term ESL ($\mu\text{g}/\text{m}^3$) * Hourly GLC_{MAX} concentration ($\mu\text{g}/\text{m}^3$) (AERMOD UIM) * Is Hourly $\text{GLC}_{\text{MAX}} \leq 10\%$ STESL? * Is the LTESL $\geq 10\%$ STESL? * 10% of Long-term ESL ($\mu\text{g}/\text{m}^3$) * Max annual off-property concentration ($\mu\text{g}/\text{m}^3$) (AERMOD UIM) * Is Annual $\text{GLC}_{\text{MAX}} \leq 10\%$ STESL?	No	No	No	No - Annual Required	0.071 0.027
7	Conduct Site-wide Modeling and submit Air Quality Analysis * Short-term ESL ($\mu\text{g}/\text{m}^3$) * Hourly GLC_{MAX} concentration ($\mu\text{g}/\text{m}^3$) (UIM or Chemical-Specific Modeling) * Is Hourly $\text{GLC}_{\text{MAX}} \leq \text{STESL}$? * Long-term ESL ($\mu\text{g}/\text{m}^3$) * Annual GLC_{MAX} concentration ($\mu\text{g}/\text{m}^3$) (AERMOD UIM) * Is Annual $\text{GLC}_{\text{MAX}} \leq \text{LTESL}$?	Complete	Complete	Complete	Pending	0.71 0.027
8	Scope of MERA evaluation is complete.	Complete	Complete	Complete	Complete	Complete

State Health Effects Analysis
 TCEQ Modeling and Effects Review Analysis Logical Hierarchy (APDG 5874) (March 2018)

Qualifying Information

Pollutant Name	Trifluoroacetic acid (Agriculture)	Trifluoroacetic acid (Agriculture with Cattle)	Perfluorohexane	Perfluoroheptane
CAS No.	76-05-1	76-05-1	355-42-0	335-57-9
Short-Term ESL (µg/m³)	2.8	n/a	10000	200
Long-Term ESL (µg/m³)	0.57	0.71	1000	20
Net Change in Hourly Emissions (lb/hr)	0.014	0.014	0.221	0.527
Net Change in Annual Emissions (TPY)	0.061	0.061	0.916	2.277
Total Hourly project increases (increase-only) (lbs/hr)	0.014	0.014	0.221	0.527
Total Annual project increases (increase-only) (tons/yr)	0.061	0.061	0.916	2.277
Total Annual PTE project production increases only (tons/yr)	0.014	0.014	0.221	0.527
Total Hourly PTE project MSS increases (lbs/hr)	0.061	0.061	0.916	2.277
Total Annual PTE project MSS increases (tons/yr)	-	-	-	-

Modeling and Effects Review Applicability (MERA) Guideline Steps

1	Is the net change in emissions ≤ 0?	No	No	No	No
2	De Minimis Increase * Is the LTESL ≥ 10% STESL? * Does this project involve MSS emission increases? * Do MSS emissions overlap with Routine Production Emissions? ** Are hourly Production / PTE increases ≤ 0.04 lb/hr and STESL = [2, 500]? ** Are hourly Production / PTE increases ≤ 0.1 lb/hr and STESL = [500, 3500]? ** Are hourly Production / PTE increases ≤ 0.4 lb/hr and STESL ≥ 3500? *** Are hourly MSS increases ≤ 0.1 lb/hr and STESL = [2, 3500]? *** Are hourly MSS increases ≤ 0.4 lb/hr and STESL ≥ 3500?	No Yes No No Yes - Step 8	No Yes No No No No Yes - Step 8	No Yes No No No No No -	No Yes No No No No -
3	Summed Unit-Impact Concentration * 10% of Short-term ESL (µg/m³) * Hourly GLC _{max} concentration (µg/m³) (AERMOD UIM) * Is Hourly GLC _{max} ≤ 10% STESL? * Is the LTESL ≥ 10% STESL? * 10% of Long-term ESL (µg/m³) * Max annual off-property concentration (µg/m³) (AERMOD UIM) * Is Annual GLC _{max} ≤ 10% STESL?	- - - No - Annual Required 0.071 0.031	- - - No - Annual Required 0.071 0.031	- - - No 20 21,509 No	- - - Yes - Skip Annual - - -
7	Conduct Sitewide Modeling and submit Air Quality Analysis * Short-term ESL (µg/m³) * Hourly GLC _{max} concentration (µg/m³) (UIM or Chemical Specific Modeling) * Is Hourly GLC _{max} ≤ STESL? * Long-term ESL (µg/m³) * Annual GLC _{max} concentration (µg/m³) (AERMOD UIM) * Is Annual GLC _{max} ≤ LTESL?	Pending - - - 0.71 0.031	Pending - - - 0.71 0.031	Pending 200 21,509 Yes - Step 8	Pending 200 21,509 Yes - Step 8
8	Scope of MERA evaluation is complete.	Complete	Complete	Complete	Complete

State Health Effects Analysis
 TCEQ Modeling and Effects Review Analysis Logical Hierarchy (APDG 5874) (March 2018)

Qualifying Information

Pollutant Name	Methanol	Isopropyl Alcohol	Perfluorooctanoic acid	Bromine
CAS No.	67-56-1	67-63-0	335-67-1	7726-95-6
Short-Term ESL ($\mu\text{g}/\text{m}^3$)	3900	4920	0.05	7
Long-Term ESL ($\mu\text{g}/\text{m}^3$)	2100	0.000	0.000	0.7
Net Change in Hourly Emissions (lb/hr)	0.629	0.000	0.000	0.137
Net Change in Annual Emissions (TPY)	0.274	0.000	0.000	0.598
Total Hourly project increases (increase-only) (lbs/hr)	0.629	0.000	0.000	0.137
Total Annual project increases (increase-only) (tons/yr)	0.274	0.000	0.000	0.598
Total Hourly PTE project production increases only (lbs/hr)	0.629	0.000	0.000	0.137
Total Annual PTE project production increases only (tons/yr)	0.274	0.000	0.000	0.598
Total Hourly PTE project MSS increases (lbs/hr)	-	-	-	-
Total Annual PTE project MSS increases (tons/yr)	-	-	-	-

Modeling and Effects Review Applicability (MERA) Guideline Steps

1	Is the net change in emissions ≤ 0 ?	No	No	No	No
2	De Minimis Increase	Yes	Yes	Yes	Yes
	* Is the LTESL $\geq 10\%$ STESL?	No	No	No	No
	* Does this project involve MSS emission increases?	No	No	No	No
	* Do MSS emissions overlap with Routine Production Emissions?	No	No	No	No
	** Are hourly Production / PTE increases ≤ 0.04 lb/hr and STESL = [2, 500]?	No	No	No	No
	** Are hourly Production / PTE increases ≤ 0.1 lb/hr and STESL = [500, 3500]?	No	No	No	No
	** Are hourly Production / PTE increases ≤ 0.4 lb/hr and STESL ≥ 3500 ?	No	Yes - Step 8	No	No
	*** Are hourly MSS increases ≤ 0.1 lb/hr and STESL = [2, 3500]?	-	-	-	-
	*** Are hourly MSS increases ≤ 0.4 lb/hr and STESL ≥ 3500 ?	-	-	-	-
3	Summed Unit-Impact Concentration	390	0.005	0.7	0.7
	* 10% of Short-term ESL ($\mu\text{g}/\text{m}^3$)	37.838	0.000	5.106	5.106
	* Hourly GLC_{max} concentration ($\mu\text{g}/\text{m}^3$) (AERMOD UIM)	Yes - Step 8	Yes - Step 8	No	No
	* Is Hourly $\text{GLC}_{\text{max}} \leq 10\%$ STESL?	Yes - Skip Annual	Yes - Skip Annual	Yes - Skip Annual	Yes - Skip Annual
	* Is the LTESL $\geq 10\%$ STESL?	-	-	-	-
	* 10% of Long-term ESL ($\mu\text{g}/\text{m}^3$)	-	-	-	-
	* Max annual off-property concentration ($\mu\text{g}/\text{m}^3$) (AERMOD UIM)	-	-	-	-
	* Is Annual $\text{GLC}_{\text{max}} \leq 10\%$ STESL?	-	-	-	-
7	Conduct Site-wide Modeling and submit Air Quality Analysis				
	* Short-term ESL ($\mu\text{g}/\text{m}^3$)				Pending
	* Hourly GLC_{max} concentration ($\mu\text{g}/\text{m}^3$) (UIM or Chemical Specific Modeling)				7
	* Is Hourly $\text{GLC}_{\text{max}} \leq \text{STESL}$?				5.106
	* Long-term ESL ($\mu\text{g}/\text{m}^3$)				Yes - Step 8
	* Annual GLC_{max} concentration ($\mu\text{g}/\text{m}^3$) (AERMOD UIM)				-
	* Is Annual $\text{GLC}_{\text{max}} \leq \text{LTESL}$?				-
8	Scope of MERA evaluation is complete.	Complete	Complete	Complete	Complete

State Health Effects Analysis
 TCEQ Modeling and Effects Review Analysis Logical Hierarchy (APDG 5874) (March 2018)

Qualifying Information		Toluene	Butylated Hydroxytoluene	Acrylic Acid	Hydrogen Chloride
Pollutant Name					
CAS No.		108-88-3	128-37-0	79-10-7	7647-01-0
Short-Term ESL ($\mu\text{g}/\text{m}^3$)		4500	Must Meet NAAQS	60	190
Long-Term ESL ($\mu\text{g}/\text{m}^3$)		1200	Must Meet NAAQS	6	7.9
Net Change in Hourly Emissions (lb/hr)		0.000	0.000	0.000	0.037
Net Change in Annual Emissions (TPY)		0.000	0.000	0.000	0.152
Total Hourly project increases (increase-only) (lbs/hr)		0.000	0.000	0.000	0.037
Total Annual project increases (increase-only) (tons/yr)		0.000	0.000	0.000	0.152
Total Hourly PTE project production increases only (lbs/hr)		0.000	0.000	0.000	0.037
Total Annual PTE project production increases only (tons/yr)		0.000	0.000	0.000	0.152
Total Hourly PTE project MSS increases (lbs/hr)		0.000	0.000	0.000	0.037
Total Annual PTE project MSS increases (tons/yr)		0.000	0.000	0.000	0.152

Modeling and Effects Review Applicability (MERA) Guideline Steps		Toluene	Butylated Hydroxytoluene	Acrylic Acid	Hydrogen Chloride
1	Is the net change in emissions ≤ 0 ?	No		No	No
2	De Minimis Increase * Is the LTESL $\geq 10\%$ STESL? * Does this project involve MSS emission increases? * Do MSS emissions overlap with Routine Production Emissions? ** Are hourly Production / PTE increases ≤ 0.04 lb/hr and STESL = [2, 500]? ** Are hourly Production / PTE increases ≤ 0.1 lb/hr and STESL = [500, 3500]? ** Are hourly Production / PTE increases ≤ 0.4 lb/hr and STESL ≥ 3500 ? *** Are hourly MSS increases ≤ 0.1 lb/hr and STESL = [2, 3500]? *** Are hourly MSS increases ≤ 0.4 lb/hr and STESL ≥ 3500 ?	Yes No No No No		Yes No No Yes - Step 8	No No No -
3	Summed Unit-Impact Concentration * 10% of Short-term ESL ($\mu\text{g}/\text{m}^3$) * Hourly GLC_{max} concentration ($\mu\text{g}/\text{m}^3$) (AERMOD UIM) * Is Hourly $\text{GLC}_{\text{max}} \leq 10\%$ STESL? * Is the LTESL $\geq 10\%$ STESL? * 10% of Long-term ESL ($\mu\text{g}/\text{m}^3$) * Max annual off-property concentration ($\mu\text{g}/\text{m}^3$) (AERMOD UIM) * Is Annual $\text{GLC}_{\text{max}} \leq 10\%$ STESL?	Yes - Step 8			19 4.323 Yes - Step 8 No - Annual Required 0.79 0.114 -
7	Conduct Site-wide Modeling and submit Air Quality Analysis * Short-term ESL ($\mu\text{g}/\text{m}^3$) * Hourly GLC_{max} concentration ($\mu\text{g}/\text{m}^3$) (UIM or Chemical Specific Modeling) * Is Hourly $\text{GLC}_{\text{max}} \leq \text{STESL}$? * Long-term ESL ($\mu\text{g}/\text{m}^3$) * Annual GLC_{max} concentration ($\mu\text{g}/\text{m}^3$) (AERMOD UIM) * Is Annual $\text{GLC}_{\text{max}} \leq \text{LTESL}$?				
8	Scope of MERA evaluation is complete.	Complete		Complete	Complete

State Health Effects Analysis
 TCEQ Modeling and Effects Review Analysis Logical Hierarchy (APDG 5874) (March 2018)

Qualifying Information

Pollutant Name	Ethyl acetate	1,1,2-Trichloro-1,2,2-trifluoroethane	Perfluoropropane	Carbon tetrafluoride
CAS No.	141-78-6	76-13-1	76-19-7	75-73-0
Short-Term ESL (µg/m³)	3100	38000	10000	18000
Long-Term ESL (µg/m³)	1440	3800	1000	1800
Net Change in Hourly Emissions (lb/hr)	0.009	0.045	0.045	0.994
Net Change in Annual Emissions (TPY)	0.036	0.197	0.197	4.354
Total Hourly project increases (increase-only) (lbs/hr)	0.009	0.045	0.045	0.994
Total Annual project increases (increase-only) (tons/yr)	0.036	0.197	0.197	4.354
Total Hourly PTE project production increases only (lbs/hr)	0.009	0.045	0.045	0.994
Total Annual PTE project production increases only (tons/yr)	0.036	0.197	0.197	4.354
Total Hourly PTE project MSS increases (lbs/hr)	-	-	-	-
Total Annual PTE project MSS increases (tons/yr)	-	-	-	-

Modeling and Effects Review Applicability (MERA) Guideline Steps

1	Is the net change in emissions ≤ 0?	No	No	No	No
2	De Minimis Increase * Is the LTESL ≥ 10% STESL? * Does this project involve MSS emission increases? * Do MSS emissions overlap with Routine Production Emissions? ** Are hourly Production / PTE increases ≤ 0.04 lb/hr and STESL = [2, 5000]? ** Are hourly Production / PTE increases ≤ 0.1 lb/hr and STESL = [500, 35000]? ** Are hourly Production / PTE increases ≤ 0.4 lb/hr and STESL ≥ 35000? *** Are hourly MSS increases ≤ 0.1 lb/hr and STESL = [2, 35000]? *** Are hourly MSS increases ≤ 0.4 lb/hr and STESL ≥ 35000?	Yes No No No Yes - Step 8	No Yes No No No No Yes - Step 8	No Yes No No No No Yes - Step 8	No Yes No No No No -
3	Summed Unit-Impact Concentration * 10% of Short-term ESL (µg/m³) * Hourly GLC _{max} concentration (µg/m³) (AERMOD UIM) * Is Hourly GLC _{max} ≤ 10% STESL? * Is the LTESL ≥ 10% STESL? * 10% of Long-term ESL (µg/m³) * Max annual off-property concentration (µg/m³) (AERMOD UIM) * Is Annual GLC _{max} ≤ 10% STESL?				1800 153.447 Yes - Step 8 Yes - Skip Annual
7	Conduct Site-wide Modeling and submit Air Quality Analysis * Short-term ESL (µg/m³) * Hourly GLC _{max} concentration (µg/m³) (UIM or Chemical Specific Modeling) * Is Hourly GLC _{max} ≤ STESL? * Long-term ESL (µg/m³) * Annual GLC _{max} concentration (µg/m³) (AERMOD UIM) * Is Annual GLC _{max} ≤ LTESL?				
8	Scope of MERA evaluation is complete.	Complete	Complete	Complete	Complete

State Health Effects Analysis
 TCEQ Modeling and Effects Review Analysis Logical Hierarchy (APDG 5874) (March 2018)

Qualifying Information

Pollutant Name	Tetrahydrofuran	Hydrogen Bromide	Acetyl Fluorides	Perfluorodecyl fluoride
CAS No.	109-99-9	10035-10-6	354-34-7	594-98-9
Short-Term ESL ($\mu\text{g}/\text{m}^3$)	1500	100	200	200
Long-Term ESL ($\mu\text{g}/\text{m}^3$)	150	10	20	20
Net Change in Hourly Emissions (lb/hr)	0.074	0.000	0.012	0.016
Net Change in Annual Emissions (TPY)	0.325	0.000	0.052	0.068
Total Hourly project increases (increase-only) (lbs/hr)	0.074	0.000	0.012	0.016
Total Annual project increases (increase-only) (tons/yr)	0.325	0.000	0.052	0.068
Total Hourly PTE project production increases only (lbs/hr)	0.074	0.000	0.012	0.016
Total Annual PTE project production increases only (tons/yr)	0.325	0.000	0.052	0.068
Total Hourly PTE project MSS increases (lbs/hr)	-	-	-	-
Total Annual PTE project MSS increases (tons/yr)	-	-	-	-

Modeling and Effects Review Applicability (MERA) Guideline Steps

1	Is the net change in emissions ≤ 0 ?	No	No	No	No
2	De Minimis Increase <ul style="list-style-type: none"> * Is the LTESL $\geq 10\%$ STESL? * Does this project involve MSS emission increases? * Do MSS emissions overlap with Routine Production Emissions? ** Are hourly Production / PTE increases ≤ 0.04 lb/hr and STESL = [2, 500]? ** Are hourly Production / PTE increases ≤ 0.1 lb/hr and STESL = [500, 3500]? ** Are hourly Production / PTE increases ≤ 0.4 lb/hr and STESL ≥ 3500? *** Are hourly MSS increases ≤ 0.1 lb/hr and STESL = [2, 3500]? *** Are hourly MSS increases ≤ 0.4 lb/hr and STESL ≥ 3500? 	Yes	Yes	Yes	Yes
		No	No	No	No
		No	Yes - Step 8	Yes - Step 8	Yes - Step 8
3	Summed Unit-Impact Concentration <ul style="list-style-type: none"> * 10% of Short-term ESL ($\mu\text{g}/\text{m}^3$) * Hourly GLC_{max} concentration ($\mu\text{g}/\text{m}^3$) (AERMOD UJM) * Is Hourly $\text{GLC}_{\text{max}} \leq 10\%$ STESL? * Is the LTESL $\geq 10\%$ STESL? * 10% of Long-term ESL ($\mu\text{g}/\text{m}^3$) * Max annual off-property concentration ($\mu\text{g}/\text{m}^3$) (AERMOD UJM) * Is Annual $\text{GLC}_{\text{max}} \leq 10\%$ STESL? 				
7	Conduct Site-wide Modeling and submit Air Quality Analysis <ul style="list-style-type: none"> * Short-term ESL ($\mu\text{g}/\text{m}^3$) * Hourly GLC_{max} concentration ($\mu\text{g}/\text{m}^3$) (UJM or Chemical Specific Modeling) * Is Hourly $\text{GLC}_{\text{max}} \leq \text{STESL}$? * Long-term ESL ($\mu\text{g}/\text{m}^3$) * Annual GLC_{max} concentration ($\mu\text{g}/\text{m}^3$) (AERMOD UJM) * Is Annual $\text{GLC}_{\text{max}} \leq \text{LTESL}$? 				
8	Scope of MERA evaluation is complete.	Complete	Complete	Complete	Complete

State Health Effects Analysis
 TCEQ Modeling and Effects Review Analysis Logical Hierarchy (APDG 5874) (March 2018)

Qualifying Information

Pollutant Name	Perfluoro (bis-2-chloroethoxy methane)	Perfluorooctane	Perfluorodecalin	Perfluoro-tert-butanol
CAS No.	130085-19-7	307-34-6	306-94-5	2378-02-1
Short-Term ESL ($\mu\text{g}/\text{m}^3$)	200	20000	200	1000
Long-Term ESL ($\mu\text{g}/\text{m}^3$)	20	2000	20	100
Net Change in Hourly Emissions (lb/hr)	0.132	0.393	0.546	0.001
Net Change in Annual Emissions (TPY)	0.561	1.705	2.387	0.000
Total Hourly project increases (increase-only) (lbs/hr)	0.132	0.393	0.546	0.001
Total Annual project increases (increase-only) (tons/yr)	0.561	1.705	2.387	0.000
Total Hourly PTE project production increases only (lbs/hr)	0.132	0.393	0.546	0.001
Total Annual PTE project production increases only (tons/yr)	0.561	1.705	2.387	0.000
Total Hourly PTE project MSS increases (lbs/hr)	0.132	0.393	0.546	0.001
Total Annual PTE project MSS increases (tons/yr)	0.561	1.705	2.387	0.000

Modeling and Effects Review Applicability (MERA) Guideline Steps

1	Is the net change in emissions ≤ 0 ?	No	No	No	No
2	De Minimis Increase * Is the LTESL $\geq 10\%$ STESL? * Does this project involve MSS emission increases? * Do MSS emissions overlap with Routine Production Emissions? ** Are hourly Production / PTE increases ≤ 0.04 lb/hr and STESL = [2, 5000]? ** Are hourly Production / PTE increases ≤ 0.1 lb/hr and STESL = [500, 3500]? ** Are hourly Production / PTE increases ≤ 0.4 lb/hr and STESL ≥ 3500 ? *** Are hourly MSS increases ≤ 0.1 lb/hr and STESL = [2, 3500]? *** Are hourly MSS increases ≤ 0.4 lb/hr and STESL ≥ 3500 ?	Yes No No No No No	Yes No No No No No	Yes No No No No No	Yes No No No No No
3	Summed Unit-Impact Concentration * 10% of Short-term ESL ($\mu\text{g}/\text{m}^3$) * Hourly GLC_{max} concentration ($\mu\text{g}/\text{m}^3$) (AERMOD UIM) * Is Hourly $\text{GLC}_{\text{max}} \leq 10\%$ STESL? * Is the LTESL $\geq 10\%$ STESL? * 10% of Long-term ESL ($\mu\text{g}/\text{m}^3$) * Max annual off-property concentration ($\mu\text{g}/\text{m}^3$) (AERMOD UIM) * Is Annual $\text{GLC}_{\text{max}} \leq 10\%$ STESL?	20 6.973 Yes - Step 8 Yes - Skip Annual	20 21,649 No Yes - Skip Annual	20 21,649 No Yes - Skip Annual	20 21,649 No Yes - Skip Annual
7	Conduct Site-wide Modeling and submit Air Quality Analysis * Short-term ESL ($\mu\text{g}/\text{m}^3$) * Hourly GLC_{max} concentration ($\mu\text{g}/\text{m}^3$) (UIM or Chemical Specific Modeling) * Is Hourly $\text{GLC}_{\text{max}} \leq \text{STESL}$? * Long-term ESL ($\mu\text{g}/\text{m}^3$) * Annual GLC_{max} concentration ($\mu\text{g}/\text{m}^3$) (AERMOD UIM) * Is Annual $\text{GLC}_{\text{max}} \leq \text{LTESL}$?	- - - - -	- - - - -	- - - - -	- - - - -
8	Scope of MERA evaluation is complete.	Complete	Complete	Complete	Complete

State Health Effects Analysis
 TCEQ Modeling and Effects Review Analysis Logical Hierarchy (APDG 5874) (March 2018)

Qualifying Information

Pollutant Name	Perfluorodecanoic acid	polymers of chlorotrifluoroethylene (PCTFE)	Perfluoro-t-butylcyclohexane
CAS No.	335-76-2	9002-83-9	84808-64-0
Short-Term ESL (µg/m³)	14	1000	200
Long-Term ESL (µg/m³)	1.4	100	20.0
Net Change in Hourly Emissions (lb/hr)	0.000	0.314	0.003
Net Change in Annual Emissions (TPY)	0.000	0.143	0.013
Total Hourly project increases (increase-only) (lbs/hr)	0.000	0.314	0.003
Total Annual project increases (increase-only) (tons/yr)	0.000	0.143	0.013
Total Hourly PTE project production increases only (lbs/hr)	0.000	0.314	0.003
Total Annual PTE project production increases only (tons/yr)	0.000	0.143	0.013
Total Hourly PTE project MSS increases (lbs/hr)	-	-	-
Total Annual PTE project MSS increases (tons/yr)	-	-	-

Modeling and Effects Review Applicability (MERA) Guideline Steps

1	Is the net change in emissions ≤ 0?	No	No	No
2	De Minimis Increase * Is the LTESL ≥ 10% STESL? * Does this project involve MSS emission increases? * Do MSS emissions overlap with Routine Production Emissions? ** Are hourly Production / PTE increases ≤ 0.04 lb/hr and STESL = [2, 500]? ** Are hourly Production / PTE increases ≤ 0.1 lb/hr and STESL = [500, 3500]? ** Are hourly Production / PTE increases ≤ 0.4 lb/hr and STESL ≥ 3500? *** Are hourly MSS increases ≤ 0.1 lb/hr and STESL = [2, 3500]? *** Are hourly MSS increases ≤ 0.4 lb/hr and STESL ≥ 3500?	Yes No No Yes - Step 8	No Yes No No No No -	No Yes No No Yes - Step 8
3	Summed Unit-Impact Concentration * 10% of Short-term ESL (µg/m³) * Hourly GLC _{MAX} concentration (µg/m³) (AERMOD UJM) * Is Hourly GLC _{MAX} ≤ 10% STESL? * Is the LTESL ≥ 10% STESL? * 10% of Long-term ESL (µg/m³) * Max annual off-property concentration (µg/m³) (AERMOD UJM) * Is Annual GLC _{MAX} ≤ 10% STESL?	-	100 17,441 Yes - Step 8 Yes - Skip Annual	-
7	Conduct Steiwide Modeling and submit Air Quality Analysis * Short-term ESL (µg/m³) * Hourly GLC _{MAX} concentration (µg/m³) (UJM or Chemical-Specific Modeling) * Is Hourly GLC _{MAX} ≤ STESL? * Long-term ESL (µg/m³) * Annual GLC _{MAX} concentration (µg/m³) (AERMOD UJM) * Is Annual GLC _{MAX} ≤ LTESL?	-	Pending 1000 17,441 Yes - Step 8	-
8	Scope of MERA evaluation is complete.	Complete	Complete	Complete

Health Effects Analysis - MERA Step 3 & Step 7
 Determining Conservative Impact with Unit Impact Scaling

Scaled Impact Determination Sample Calculation

Hourly Hydrogen Fluoride Impact of EPN EP3-1

$$= \text{Unit impact EP3-1 } (\mu\text{g}/\text{m}^3) / (\text{lb}/\text{hr}) * \text{EP3-1 Hourly HF ER } (\text{lb}/\text{hr})$$

$$= 154.37366 (\mu\text{g}/\text{m}^3) / (\text{lb}/\text{hr}) * 0.01$$

$$= 1.14 \mu\text{g}/\text{m}^3$$

	1-hour UIM ($\mu\text{g}/\text{m}^3$) / (lb/hr)					
	EP3-1	EP3-2	EP3-3	FUG3-1	FUG3-2	FUG3-4
Full Grid	154.37	56.87	57.54	37.36	57.59	55.58
Ag Grid	120.14	24.42	24.34	24.76	26.27	24.92
						26.10

AERMOD Predicted Impacts ($\mu\text{g}/\text{m}^3$) - Scaled Hourly Impact

Non-Criteria Pollutant	Short-Term ESL ($\mu\text{g}/\text{m}^3$)	Hourly Impact ($\mu\text{g}/\text{m}^3$)						Short-Term Total	Impact Exceeds ESL?
		EP3-1	EP3-2	EP3-3	FUG3-1	FUG3-2	FUG3-3		
Hydrogen Fluoride	18.00	1.14	-	-	4.72	-	-	5.86	FALSE
Hydrogen Fluoride (Agriculture)	3.00	0.89	-	-	3.13	-	-	4.01	See Chemical Specific Modeling
Hydrogen Fluoride (Agriculture with Cattle)	n/a								
Difluorine	2.00	0.02	-	-	3.86	-	-	3.87	See Chemical Specific Modeling
Carbonyl Fluoride (Agriculture with Cattle)	n/a								
Trifluoroacetic acid (Agriculture with Cattle)	n/a								
Perfluorheptane	200.00	2.42	-	-	19.09	-	-	21.51	FALSE
Methanol	3900.00	4.31	13.36	18.49	1.68	-	-	37.84	FALSE
Perfluorooctanoic acid	0.05	0.00	-	-	-	-	-	0.00	FALSE
Bromine	7.00	0.00	-	-	5.10	-	-	5.11	FALSE
Hydrogen Chloride	190.00	3.51	-	-	-	0.43	0.20	4.32	FALSE
Carbon tetrafluoride	18000.00	153.45	-	-	-	-	-	153.45	FALSE
Perfluoro (bis-2-chloroethoxy methane)	200.00	2.68	-	-	4.29	-	-	6.97	FALSE
Perfluorodecalin	200.00	1.64	-	-	20.01	-	-	21.65	FALSE
polymers of chlorotrifluoroethylene (PCTFE)	1000.00	0.05	6.76	9.58	1.05	-	-	17.44	FALSE

Health Effects Analysis - MERA Step 3 & Step 7
 Determining Conservative Impact with Unit Impact Scaling

Scaled Impact Determination Sample Calculation

Annual Hydrogen Fluoride Impact of EPN EP3-1
 = Unit Impact EP3-1 ($\mu\text{g}/\text{m}^3$) / (lb/hr) * EP3-1 Annual Phenol ER (tons/yr) * 2000 lbs/ton / 8760 hrs/yr
 = 2.84758 ($\mu\text{g}/\text{m}^3$) / (lb/hr) * 0.052 / 4.38
 = 0.03 $\mu\text{g}/\text{m}^3$

	Annual UIM ($\mu\text{g}/\text{m}^3$) / (lb/hr)					
	EP3-1	EP3-2	EP3-3	FUG3-1	FUG3-2	FUG3-4
Full Grid	2.85	4.05	4.10	2.92	3.86	3.98
Ag Grid	2.23	1.65	1.64	1.99	1.71	1.68



AERMOD Predicted Impacts ($\mu\text{g}/\text{m}^3$) - Scaled Annual Impact

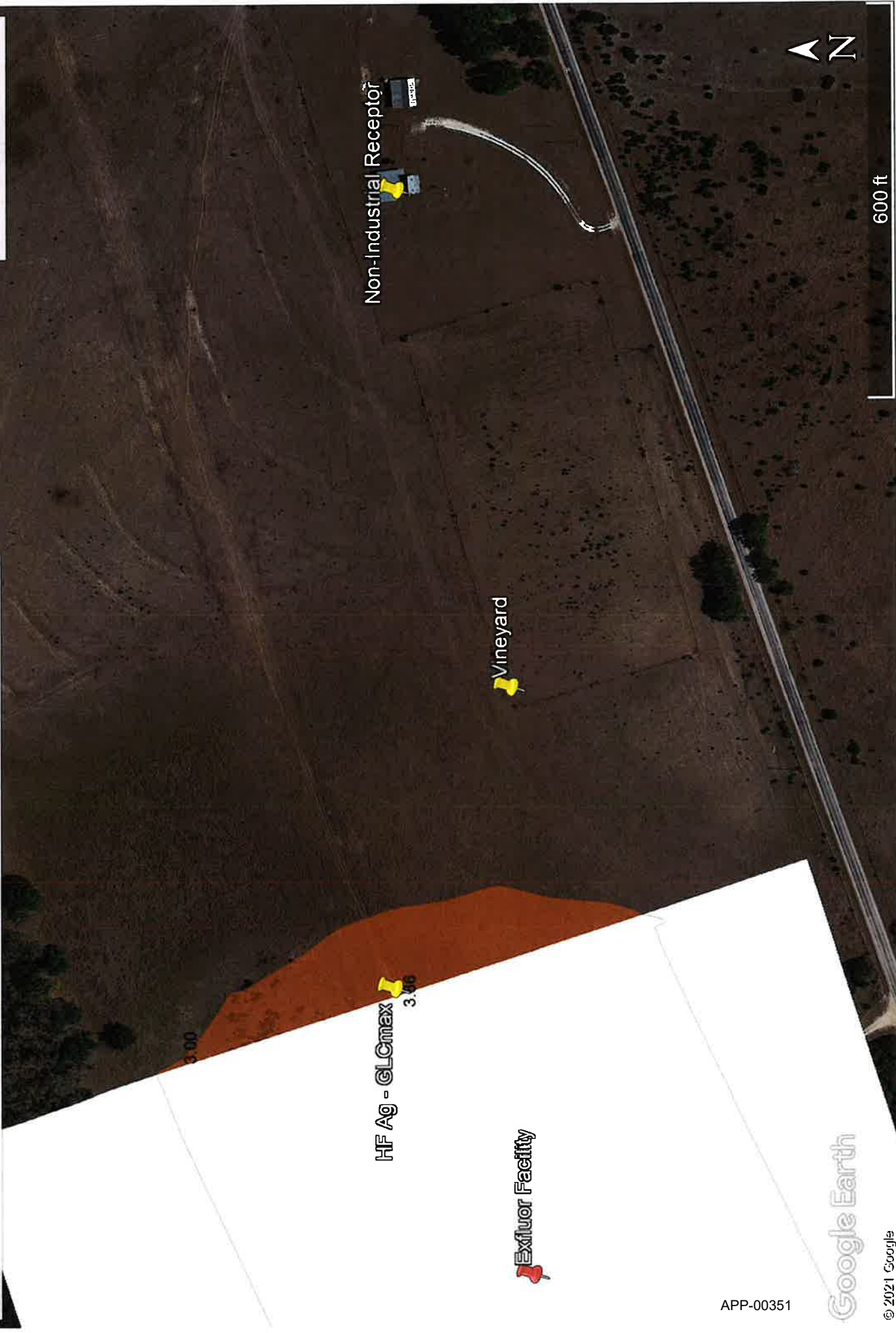
Non-Criteria Pollutant	Long-Term ESL ($\mu\text{g}/\text{m}^3$)	Annual Impact ($\mu\text{g}/\text{m}^3$)						Long-Term Total	Impact Exceeds ESL?
		EP3-1	EP3-2	EP3-3	FUG3-1	FUG3-2	FUG3-4		
Hydrogen Fluoride	8.70	-	-	-	-	-	-	-	-
Hydrogen Fluoride (Agriculture)	0.60	-	-	-	-	-	-	-	-
Hydrogen Fluoride (Agriculture with Cattle)	0.75	0.02	-	-	0.25	-	-	0.27	FALSE
Difluorine	0.20	-	-	-	-	-	-	-	-
Carbonyl Fluoride (Agriculture with Cattle)	0.71	0.03	-	-	-	-	-	0.03	FALSE
Trifluoroacetic acid (Agriculture with Cattle)	0.71	0.03	-	-	-	-	-	0.03	FALSE
Perfluoroheptane	20.00	-	-	-	-	-	-	-	-
Methanol	2100.00	-	-	-	-	-	-	-	-
Perfluorooctanoic acid	0.01	-	-	-	-	-	-	-	-
Bromine	0.70	-	-	-	-	-	-	-	-
Hydrogen Chloride	7.90	0.06	-	-	-	0.03	-	0.11	FALSE
Carbon tetrafluoride	1800.00	-	-	-	-	-	-	-	-
Perfluoro (bis-2-chloroethoxy methane)	20.00	-	-	-	-	-	-	-	-
Perfluorodecalin	20.00	-	-	-	-	-	-	-	-
polymers of chlorotrifluoroethylene (PCTFE)	100.00	-	-	-	-	-	-	-	-

Impacts of Hydrogen Fluoride in Agricultural Areas

The contours in this plot represent predicted concentrations at or above the representative ESL threshold.

Legend

-  3 ug/m³
-  Exfluor Florence Site



HF Ag - GLCmax
3.46

Vineyard



Non-Industrial Receptor

Exfluor Facility

Impacts of Difluorine

The contours in this plot represent predicted concentrations at or above the representative ESL threshold.

Legend

-  2 ug/m³
-  3 ug/m³
-  Exfluor Florence Site



1000 ft

SECTION 4.0

ELECTRONIC INFORMATION

Model input/output and associated computer or electronic files will be shared via the TCEQ's FTP site concurrently with the submittal of this analysis document. The guide below provides an overview of the contents and organization of this shared directory.

File or Folder Name	Description
01 – Model Output	This directory contains the AERMOD modeling input/output files.
02 – Meteorology	This directory contains the meteorological input files downloaded from the TCEQ's website and used in these analyses.
03 – Receptors	This directory contains the receptor grids used for these modeling analyses
04 – AERSURFACE	This directory contains the AERSURFACE output files, containing the surface roughness value for the project site.
05 – Terrain Elevation	This directory contains the land elevation files used to determine base elevation of each receptor, emission point, and downwash structure.
06 – Downwash	This directory contains the BPIP input and output files for determining downwash factors for each point source.
07 – Plots and Maps	This directory contains the plot plan, area map, and contour plots of HF and Difluorine impacts.

APPENDIX

EMISSIONS SUMMARY TABLES AND MODELED RELEASE PARAMETERS

PROPOSED EMISSIONS FOR FLORENCE SITE

Pollutant	CAS	ESL Source	Short-Term ESL (µg/m3)	Long-Term ESL (µg/m3)	EP3-1		EP3-2	
					(lbs/hr)	(tons/yr)	(lbs/hr)	(tons/yr)
Hydrogen Fluoride	7664-39-3	TAMIS	18.00	8.70	7.4E-03	0.03	-	-
Hydrogen Fluoride (Agriculture)	7664-39-3	TAMIS	3.00	0.60	7.4E-03	0.03	-	-
Hydrogen Fluoride (Agriculture with Cattle)	7664-39-3	TAMIS	n/a	0.75	7.4E-03	0.03	-	-
Difluorine	7782-41-4	TAMIS	2.00	0.20	1.1E-04	5.0E-04	-	-
Carbonyl Fluoride	353-50-4	TAMIS	17.00	8.10	0.01	0.05	-	-
Carbonyl Fluoride (Agriculture)	353-50-4	TAMIS	2.80	0.57	0.01	0.05	-	-
Carbonyl Fluoride (Agriculture with Cattle)	353-50-4	TAMIS	n/a	0.71	0.01	0.05	-	-
Acetyl Fluorides	354-34-7	2008 Email	200.00	20.00	0.01	0.05	-	-
Trifluoroacetic acid	76-05-1	TAMIS	17.00	8.10	0.01	0.06	-	-
Trifluoroacetic acid (Agriculture)	76-05-1	TAMIS	2.80	0.57	0.01	0.06	-	-
Trifluoroacetic acid (Agriculture with Cattle)	76-05-1	TAMIS	n/a	0.71	0.01	0.06	-	-
Perfluoropentanoyl fluoride	375-62-2	-	-	-	0.02	0.04	-	-
Perfluorohexanoyl fluoride	355-38-4	-	-	-	0.02	0.04	-	-
Perfluoroheptanoyl fluoride	375-84-8	-	-	-	0.01	0.04	-	-
Perfluorooctanoyl fluoride	335-66-0	-	-	-	0.01	0.04	-	-
Perfluorononanoyl fluoride	558-95-2	-	-	-	0.01	0.04	-	-
Perfluorodecyl fluoride	594-98-9	2008 Email	200.00	20.00	0.01	0.04	-	-
Perfluorosuccinoyl fluoride	679-13-0	-	-	-	0.03	0.05	-	-
Hexafluoroglutaroyl fluoride	678-78-4	-	-	-	0.02	0.05	-	-
Octafluoroadipoyl fluoride	37881-62-2	-	-	-	0.02	0.05	-	-
Perfluorosuberoyl fluoride	24647-09-4	-	-	-	0.01	0.05	-	-
Perfluorosebacoyl fluoride	-	-	-	-	0.01	0.04	-	-
Perfluorobutoxyethoxyacetyl fluoride	172897-75-5	-	-	-	0.01	0.05	-	-
Perfluorotriglycyl fluoride	24647-19-6	-	-	-	0.02	0.05	-	-
Perfluoro-3,6,9-Trioxatridecanoyl fluoride	883733-06-0	-	-	-	0.01	0.05	-	-
Perfluorotetraglycyl fluoride	24689-56-3	-	-	-	0.01	0.05	-	-
Perfluoro-3,6,9-Trioxatridecanoic acid	330562-41-9	-	-	-	0.01	0.05	-	-
Perfluoropolyethylene Glycol Glycyl fluoride	-	-	-	-	-	-	-	-
Perfluoropolytrimethylene acyl fluoride	-	-	-	-	1.2E-05	6.0E-08	-	-
Perfluoropolytetramethylene acyl fluoride	-	-	-	-	1.2E-05	6.0E-08	-	-
Perfluoropolydioxolane diacyl fluoride	-	-	-	-	1.2E-05	6.1E-08	-	-
Perfluorocyclohexyl carbonyl fluoride	6588-63-2	-	-	-	0.02	0.04	-	-
Perfluoropolyethylene Glycol Diol	-	-	-	-	-	-	-	-
Perfluoropolydioxolane Diol	-	-	-	-	5.8E-07	5.9E-08	-	-
Perfluoro (polyethylene glycol) diacid fluoride	-	-	-	-	0.01	0.05	-	-
Perfluoro (polytrimethylene glycol) diacid fluoride	-	-	-	-	0.01	0.04	-	-
Perfluoro (polytetramethylene glycol) diacid fluoride	-	-	-	-	1.0E-02	0.04	-	-
Perfluoropolydioxolane Diacid fluoride	882695-72-9	-	-	-	0.01	0.05	-	-
Tetrachlorohexafluorobutane	375-34-8	-	-	-	0.02	0.08	-	-
Pentachloropentafluorobutane	375-46-2	-	-	-	0.02	0.10	-	-
Hexachlorotetrafluorobutane	375-49-5	-	-	-	0.03	0.14	-	-
Perfluoro (bis-2-chloroethoxy methane)	130085-19-7	2008 Email	200.00	20.00	0.02	0.06	-	-
Perfluoropentane	678-26-2	-	-	-	0.03	0.04	-	-
Perfluorohexane	355-42-0	TAMIS	10000.00	1000.00	0.02	0.04	-	-
Perfluoroheptane	335-57-9	TAMIS	200.00	20.00	0.02	0.04	-	-
Perfluorooctane	307-34-6	2008 Email	20000.00	2000.00	0.01	0.04	-	-
Perfluorononane	375-96-2	-	-	-	0.01	0.04	-	-
Perfluorodecane	376-03-4	-	-	-	9.3E-03	0.04	-	-
Perfluoropentadecane	2264-03-1	-	-	-	9.2E-03	0.04	-	-
Perfluorodecalin	306-94-5	2008 Email	200.00	20.00	0.01	0.04	-	-
Perfluoroperhydrophenanthrene	306-91-2	-	-	-	9.7E-03	0.04	-	-
Perfluoromethyldecalin	306-92-3	-	-	-	9.6E-03	0.04	-	-
Perfluorodimethylcyclohexane	306-98-9	-	-	-	0.01	0.04	-	-
Perfluoroperhydrofluorene	307-08-4	-	-	-	9.7E-03	0.04	-	-
Perfluorodisopropylcyclohexane	75169-51-6	-	-	-	9.2E-03	0.04	-	-
Perfluorooctyl bromide	423-55-2	-	-	-	1.3E-03	6.3E-06	-	-
Methyl perfluoropentanoate	13038-26-1	-	-	-	0.01	0.05	0.38	0.05
Methyl perfluorohexanoate	424-18-0	-	-	-	0.01	0.05	0.23	0.03
Methyl perfluoroheptanoate	14312-89-1	-	-	-	0.01	0.05	0.14	0.02
Methyl perfluorooctanoate	376-27-2	-	-	-	0.01	0.05	0.10	0.01
Methyl perfluorononanoate	51502-45-5	-	-	-	0.01	0.05	0.05	6.1E-03
Methyl perfluorodecanoate	307-79-7	-	-	-	0.01	0.04	0.02	2.5E-03
Methyl perfluorododecanoate	56554-52-0	-	-	-	0.01	0.04	2.0E-03	2.5E-04
Methyl perfluorotetradecanoate	203302-99-2	-	-	-	1.0E-02	0.04	4.1E-04	4.9E-05
Methyl perfluorohexadecanoate	165457-57-8	-	-	-	9.9E-03	0.04	-	-
Dimethyl perfluorosuccinate	356-36-5	-	-	-	0.02	0.09	0.03	3.4E-03
Dimethyl perfluoroglutarate	1513-62-8	-	-	-	0.02	0.07	8.6E-03	1.1E-03
Dimethyl perfluoroadipate	3107-98-0	-	-	-	0.01	0.06	6.1E-03	7.6E-04
Dimethyl perfluoro-3,6-dioxaoctane-1,8-dioate	24647-20-9	-	-	-	0.02	0.07	7.1E-03	8.8E-04
Methyl perfluoro-3,6,9-trioxadecanoate	169289-58-1	-	-	-	0.01	0.05	0.05	5.9E-03
Dimethyl perfluorosuberate	2062-20-6	-	-	-	0.01	0.06	3.6E-03	4.5E-04
Dimethyl perfluoro-3,6,9-trioxadecane-1,11-dioate	35910-59-9	-	-	-	0.01	0.06	4.2E-03	5.1E-04
Methyl perfluoro-3,6-dioxadecanoate	129301-40-2	-	-	-	0.01	0.05	0.05	5.5E-03
Dimethyl perfluoroazelate	2216-90-1	-	-	-	0.01	0.05	2.1E-03	2.5E-04
Dimethyl perfluorosebacate	4590-24-3	-	-	-	0.01	0.05	2.0E-03	2.4E-04

PROPOSED EMISSIONS FOR FLORENCE SITE

Pollutant	CAS	ESL Source	Short-Term ESL (µg/m3)	Long-Term ESL (µg/m3)	EP3-1		EP3-2	
					(lbs/hr)	(tons/yr)	(lbs/hr)	(tons/yr)
Methyl perfluoroundecanoate	203302-98-1	-	-	-	0.01	0.04	8.9E-03	1.1E-03
Dimethyl perfluoro-1,12-decanedioate	84750-88-9	-	-	-	0.01	0.05	6.3E-03	7.5E-04
Perfluoropolyethylene	-	-	-	-	0.01	0.05	-	-
Methanol	67-58-1	TAMIS	3900.00	2100.00	0.03	4.7E-04	0.23	0.03
Methyl perfluoro-3,6-dioxahexanoate	39187-41-2	-	-	-	-	-	0.15	0.02
Methyl perfluoro-3,6,9-trioxatridecanoate	330562-42-0	-	-	-	0.01	0.05	0.01	1.8E-03
Isopropyl Alcohol	67-63-0	TAMIS	4920.00	492.00	4.3E-05	8.1E-07	-	-
1H,1H-Perfluoro-1-pentanol	355-28-2	-	-	-	1.9E-04	6.5E-07	-	-
1H,1H-Perfluoro-1-hexanol	423-46-1	-	-	-	8.1E-05	2.6E-07	-	-
1H,1H-Perfluoro-1-heptanol	375-82-6	-	-	-	4.3E-05	1.3E-07	-	-
1H,1H-Perfluoro-1-octanol	307-30-2	-	-	-	3.0E-05	1.9E-07	-	-
1H,1H-Perfluoro-1-nonanol	423-56-3	-	-	-	1.2E-05	3.7E-08	-	-
1H,1H-Perfluoro-1-decanol	307-37-9	-	-	-	1.5E-06	3.9E-09	-	-
1H,1H-Perfluoro-1-undecanol	307-46-0	-	-	-	8.6E-06	3.0E-08	-	-
1H,1H-Perfluoro-1-dodecanol	423-65-4	-	-	-	7.5E-16	9.3E-20	-	-
1H,1H-Perfluoro-1-tetradecanol	15622-57-8	-	-	-	3.4E-08	6.9E-11	-	-
Perfluoro-3,7-dimethyloctan-1-ol	232587-50-7	-	-	-	1.5E-06	3.8E-09	-	-
1H,1H,4H,4H-Perfluoro-1,4-butanediol	425-61-6	-	-	-	4.4E-08	3.1E-09	-	-
1H,1H,5H,5H-Perfluoro-1,5-pentanediol	376-90-9	-	-	-	1.1E-08	4.6E-11	-	-
1H,1H,6H,6H-Perfluoro-1,6-hexanediol	355-74-8	-	-	-	1.4E-07	8.3E-10	-	-
1H,1H,8H,8H-Perfluoro-1,8-octanediol	90177-96-1	-	-	-	8.5E-08	2.1E-10	-	-
1H,1H,9H,9H-Perfluoro-1,9-nonanediol	203303-01-9	-	-	-	1.9E-10	2.8E-13	-	-
1H,1H,10H,10H-Perfluoro-1,10-decanediol	754-96-1	-	-	-	3.8E-10	6.1E-13	-	-
1H,1H,12H,12H-Perfluoro-1,12-dodecanediol	183162-43-8	-	-	-	1.4E-10	2.2E-13	-	-
Perfluoro-tert-butanol	2378-02-1	2008 Email	1000.00	100.00	1.1E-03	3.9E-06	-	-
Fluorinated diethylene glycol monomethyl ether	330562-43-1	-	-	-	6.4E-05	1.9E-07	-	-
Fluorinated triethylene glycol monomethyl ether	147492-57-7	-	-	-	7.9E-05	2.5E-07	-	-
Fluorinated diethylene glycol monobutyl ether	152914-73-3	-	-	-	5.0E-05	2.6E-07	-	-
Fluorinated triethylene glycol monobutyl ether	317817-24-6	-	-	-	2.0E-05	9.8E-08	-	-
Fluorinated triethylene glycol	129301-42-4	-	-	-	7.5E-09	2.5E-11	-	-
Fluorinated tetraethylene glycol	330562-44-2	-	-	-	2.5E-09	7.7E-12	-	-
Perfluoropentanoic acid	2706-90-3	-	-	-	6.3E-06	3.1E-08	-	-
Perfluorohexanoic acid	307-24-4	-	-	-	6.3E-06	3.1E-08	-	-
Perfluoroheptanoic acid	375-85-9	-	-	-	3.8E-06	1.9E-08	-	-
Perfluorooctanoic acid	335-67-1	TAMIS	0.05	0.01	1.9E-06	1.1E-08	-	-
Perfluorononanoic acid	375-95-1	-	-	-	1.8E-06	9.1E-09	-	-
Perfluorodecanoic acid	335-76-2	2008 Email	14.00	1.40	4.5E-07	2.3E-09	-	-
Perfluoroundecanoic acid	2058-94-8	-	-	-	1.3E-07	6.4E-10	-	-
Perfluorododecanoic acid	307-55-1	-	-	-	1.1E-07	5.4E-10	-	-
Perfluorododecanedioic acid	865-85-0	-	-	-	8.9E-10	4.4E-12	-	-
Perfluorotetradecanoic acid	376-06-7	-	-	-	1.5E-08	7.4E-11	-	-
Perfluorohexadecanoic acid	67905-19-5	-	-	-	1.1E-07	5.7E-10	-	-
Perfluorosuccinic acid	377-38-8	-	-	-	3.1E-08	1.5E-10	-	-
Perfluoroglutaric acid	376-73-8	-	-	-	1.0E-08	5.1E-11	-	-
Perfluoro-3,6-dioxahexanoic acid	151772-58-6	-	-	-	1.1E-06	5.5E-09	-	-
Perfluoroazodic acid	336-08-3	-	-	-	2.9E-10	1.4E-12	-	-
Perfluoro-3,6-dioxaoctane-1,8-dioic acid	55621-21-1	-	-	-	5.4E-09	2.7E-11	-	-
Perfluoro-3,6,9-trioxadecanoic acid	151772-59-7	-	-	-	9.7E-06	4.8E-08	-	-
Perfluorosuberlic acid	678-45-5	-	-	-	2.5E-08	1.2E-10	-	-
Perfluoro-3,6-dioxadecanoic acid	137780-69-9	-	-	-	3.2E-07	1.6E-09	-	-
Perfluoro-3,6,9-trioxadecane-1,11-dioic acid	55621-18-6	-	-	-	3.4E-10	1.7E-12	-	-
Perfluoroazelaic acid	23453-64-7	-	-	-	6.9E-09	3.5E-11	-	-
Perfluoro-3,7-dimethyloctanoic acid	172155-07-8	-	-	-	6.9E-07	3.4E-09	-	-
Perfluorosebacic acid	307-78-8	-	-	-	1.9E-09	9.7E-12	-	-
Bromine	7726-95-6	TAMIS	7.00	0.70	1.5E-05	7.8E-07	-	-
Perfluorohexyl bromide	335-56-8	-	-	-	1.0E-06	7.7E-10	-	-
Perfluoroheptyl bromide	375-88-2	-	-	-	9.5E-07	7.1E-10	-	-
Perfluorononyl bromide	558-96-3	-	-	-	6.8E-07	5.1E-10	-	-
Perfluorodecyl bromide	307-43-7	-	-	-	7.9E-08	6.0E-11	-	-
Perfluoro-1,4-dibromobutane	335-48-8	-	-	-	2.3E-06	6.9E-09	-	-
Perfluoro-1,6-dibromohexane	918-22-9	-	-	-	1.0E-06	7.5E-10	-	-
Perfluoro-1,8-dibromooctane	812-58-8	-	-	-	2.5E-07	1.9E-10	-	-
Perfluoro-2,5,8-trioxanonyl bromide	330562-45-3	-	-	-	2.7E-07	2.0E-10	-	-
Perfluoro-2,5-dioxanonyl bromide	330562-46-4	-	-	-	3.1E-07	2.4E-10	-	-
Perfluoro-2,5,8-trioxadodecyl bromide	330562-47-5	-	-	-	3.5E-07	2.6E-10	-	-
Perfluoro-1,6-dibromo-2,5-dioxahexane	330562-48-6	-	-	-	5.2E-07	3.9E-10	-	-
Perfluoro-1,9-dibromo-2,5,8-trioxanonane	330562-49-7	-	-	-	7.7E-07	5.8E-10	-	-
polymers of chlorotrifluoroethylene (PCTFE)	9002-83-9	2008 Email	1000.00	100.00	3.3E-04	5.2E-04	0.12	7.8E-03
Toluene	108-88-3	TAMIS	4500.00	1200.00	1.8E-05	2.4E-07	-	-
Butylated Hydroxytoluene	128-37-0	TAMIS	Must Meet NAAQS	Must Meet NAAQS	7.1E-09	8.9E-11	-	-
PDO Diol	-	-	-	-	2.5E-11	4.8E-13	-	-
Perfluorosuccinic anhydride	699-30-9	-	-	-	5.9E-06	1.4E-07	-	-
Perfluoroglutaric anhydride	376-68-1	-	-	-	3.6E-06	8.7E-08	-	-
Acrylic Acid	79-10-7	TAMIS	60.00	6.00	4.8E-08	3.4E-08	-	-
1H,1H-Perfluoro-n-octyl acrylate	307-98-2	-	-	-	3.7E-08	4.4E-09	-	-

PROPOSED EMISSIONS FOR FLORENCE SITE

Pollutant	CAS	ESL Source	Short-Term ESL (µg/m3)	Long-Term ESL (µg/m3)	EP3-1		EP3-2	
					(lbs/hr)	(tons/yr)	(lbs/hr)	(tons/yr)
1H,1H-Perfluoro-n-decyl acrylate	335-83-1	-	-	-	1.6E-09	2.0E-10	-	-
1H,1H-Perfluoro-n-octyl methacrylate	3934-23-4	-	-	-	3.4E-09	4.1E-10	-	-
1H,1H-Perfluoro-n-decyl methacrylate	23069-32-1	-	-	-	2.5E-09	3.0E-10	-	-
1H,1H,6H-Perfluoro-1,8-hexanediol diacrylate	2264-01-9	-	-	-	1.3E-11	1.5E-12	-	-
Perfluoro-[15]-crown-5 ether	97571-69-2	-	-	-	6.5E-07	7.7E-08	-	-
Fluorinated PTMG 250 Diol	146191-87-9	-	-	-	4.4E-07	8.9E-09	-	-
Hydrogen Chloride	7647-01-0	TAMIS	190.00	7.90	0.02	0.09	-	-
Fluorinated Poly (Trimethylene Glycol)	-	-	-	-	5.8E-07	1.2E-08	-	-
Tetraethylene glycol dimethyl ether	143-24-8	-	-	-	3.4E-09	2.2E-10	-	-
Perfluoro(Diethylene Glycol Monoisobutyl Ether)	1423231-12-2	-	-	-	2.5E-05	5.5E-07	-	-
Perfluorocyclohexyl methanol	28788-68-3	-	-	-	8.2E-06	1.4E-07	-	-
Perfluoro(Polyethylene Glycol 400)-CH2OH terminated	146222-54-0	-	-	-	5.8E-07	1.2E-08	-	-
Ethyl acetate	141-78-6	TAMIS	3100.00	1440.00	5.8E-04	1.0E-04	-	-
Perfluoro-t-butylcyclohexane	84808-64-0	2008 Email	200.00	20.00	-	-	-	-
1,1,2-Trichloro-1,2,2-trifluoroethane	76-13-1	TAMIS	38000.00	3800.00	-	-	-	-
Perfluorobutyl Fluoride	335-42-2	-	-	-	-	-	-	-
Perfluoropropane	76-19-7	TAMIS	10000.00	1000.00	-	-	-	-
Carbon tetrafluoride	75-73-0	TAMIS	18000.00	1800.00	0.99	4.35	-	-
Tetrahydrofuran	109-99-9	TAMIS	1500.00	150.00	1.8E-03	6.9E-03	-	-
Acid Fluorides	-	-	-	-	-	-	-	-
Hydrogen Bromide	10035-10-6	TAMIS	100.00	10.00	2.0E-04	1.3E-05	-	-
Oxides of Nitrogen	10102-43-9	-	Must Meet NAAQS	Must Meet NAAQS	0.03	0.13	-	-
Carbon Monoxide	630-08-0	-	Must Meet NAAQS	Must Meet NAAQS	0.04	0.18	-	-
Particulate Matter (PM ₁₀ , PM _{2.5})	-	-	Must Meet NAAQS	Must Meet NAAQS	3.8E-03	0.02	-	-

PROPOSED EMISSIONS FOR FLORENCE SITE

Pollutant	CAS	ESL Source	Short-Term ESL (µg/m3)	Long-Term ESL (µg/m3)	EP3-3		FUG3-1	
					(lbs/hr)	(tons/yr)	(lbs/hr)	(tons/yr)
Hydrogen Fluoride	7664-39-3	TAMIS	18.00	8.70	-	-	0.13	0.55
Hydrogen Fluoride (Agriculture)	7664-39-3	TAMIS	3.00	0.60	-	-	0.13	0.55
Hydrogen Fluoride (Agriculture with Cattle)	7664-39-3	TAMIS	n/a	0.75	-	-	0.13	0.55
Difluorine	7782-41-4	TAMIS	2.00	0.20	-	-	0.10	0.45
Carbonyl Fluoride	353-50-4	TAMIS	17.00	8.10	-	-	-	-
Carbonyl Fluoride (Agriculture)	353-50-4	TAMIS	2.80	0.57	-	-	-	-
Carbonyl Fluoride (Agriculture with Cattle)	353-50-4	TAMIS	n/a	0.71	-	-	-	-
Acetyl Fluorides	354-34-7	2008 Email	200.00	20.00	-	-	1.1E-03	4.8E-03
Trifluoroacetic acid	76-05-1	TAMIS	17.00	8.10	-	-	-	-
Trifluoroacetic acid (Agriculture)	76-05-1	TAMIS	2.80	0.57	-	-	-	-
Trifluoroacetic acid (Agriculture with Cattle)	76-05-1	TAMIS	n/a	0.71	-	-	-	-
Perfluoropentanoyl fluoride	375-62-2	-	-	-	-	-	0.01	0.05
Perfluorohexanoyl fluoride	355-38-4	-	-	-	-	-	4.7E-03	0.02
Perfluoroheptanoyl fluoride	375-84-8	-	-	-	-	-	8.7E-03	0.04
Perfluorooctanoyl fluoride	335-66-0	-	-	-	-	-	7.4E-03	0.03
Perfluorononanoyl fluoride	558-95-2	-	-	-	-	-	0.01	0.04
Perfluorodecyl fluoride	594-98-9	2008 Email	200.00	20.00	-	-	6.0E-03	0.03
Perfluorosuccinoyl fluoride	679-13-0	-	-	-	-	-	4.7E-03	0.02
Hexafluoroglutaroyl fluoride	678-78-4	-	-	-	-	-	7.4E-03	0.03
Octafluoroadipoyl fluoride	37881-62-2	-	-	-	-	-	0.02	0.07
Perfluorosuberoyl fluoride	24647-09-4	-	-	-	-	-	3.3E-03	0.01
Perfluorosebacoyl fluoride	-	-	-	-	-	-	-	-
Perfluorobutoxyethoxyacetyl fluoride	172897-75-5	-	-	-	-	-	5.3E-03	0.02
Perfluorotriethyl acyl fluoride	24647-19-6	-	-	-	-	-	2.0E-03	8.6E-03
Perfluoro-3,6,9-trioxatridecanoil fluoride	883733-06-0	-	-	-	-	-	6.8E-03	0.03
Perfluorotetraglycol fluoride	24689-56-3	-	-	-	-	-	2.0E-03	8.6E-03
Perfluoro-3,6,9-trioxatridecanoic acid	330562-41-9	-	-	-	-	-	-	-
Perfluoropolyethylene Glycol Glycol fluoride	-	-	-	-	-	-	6.3E-03	0.03
Perfluoropolytrimethylene acyl fluoride	-	-	-	-	-	-	-	-
Perfluoropolytetramethylene acyl fluoride	-	-	-	-	-	-	-	-
Perfluoropolydioxolane diacyl fluoride	-	-	-	-	-	-	-	-
Perfluorocyclohexyl carbonyl fluoride	6588-63-2	-	-	-	-	-	4.7E-03	0.02
Perfluoropolyethylene Glycol Diol	-	-	-	-	-	-	-	-
Perfluoropolydioxolane Diol	-	-	-	-	-	-	-	-
Perfluoro (polyethylene glycol) diacid fluoride	-	-	-	-	-	-	2.0E-03	8.6E-03
Perfluoro (polytrimethylene glycol) diacid fluoride	-	-	-	-	-	-	2.0E-03	8.6E-03
Perfluoro (polytetramethylene glycol) diacid fluoride	-	-	-	-	-	-	1.9E-03	8.2E-03
Perfluoropolydioxolane Diacid fluoride	882695-72-9	-	-	-	-	-	9.9E-03	0.04
Tetrachlorohexafluorobutane	375-34-8	-	-	-	-	-	0.30	1.32
Pentachloropentafluorobutane	375-46-2	-	-	-	-	-	0.15	0.67
Hexachlorotetrafluorobutane	375-49-5	-	-	-	-	-	0.06	0.27
Perfluoro (bis-2-chloroethoxy methane)	130085-19-7	2008 Email	200.00	20.00	-	-	0.11	0.50
Perfluoropentane	678-26-2	-	-	-	-	-	0.11	0.48
Perfluorohexane	355-42-0	TAMIS	10000.00	1000.00	-	-	0.20	0.88
Perfluoroheptane	335-57-9	TAMIS	200.00	20.00	-	-	0.51	2.24
Perfluorooctane	307-34-6	2008 Email	20000.00	2000.00	-	-	0.38	1.67
Perfluorononane	375-96-2	-	-	-	-	-	0.11	0.48
Perfluorotridecane	376-03-4	-	-	-	-	-	0.07	0.29
Perfluoropentadecane	2264-03-1	-	-	-	-	-	0.07	0.29
Perfluorodecalin	306-94-5	2008 Email	200.00	20.00	-	-	0.54	2.35
Perfluoroperhydrophenanthrene	306-91-2	-	-	-	-	-	0.09	0.37
Perfluoromethyldecalin	306-92-3	-	-	-	-	-	0.07	0.29
Perfluorodimethylcyclohexane	306-98-9	-	-	-	-	-	0.11	0.48
Perfluoroperhydrofluorene	307-08-4	-	-	-	-	-	0.07	0.29
Perfluorodiisopropylcyclohexane	75169-51-6	-	-	-	-	-	-	-
Perfluorooctyl bromide	423-55-2	-	-	-	-	-	0.07	0.29
Methyl perfluoropentanoate	13038-26-1	-	-	-	0.50	0.06	-	-
Methyl perfluorohexanoate	424-18-0	-	-	-	0.30	0.04	-	-
Methyl perfluoroheptanoate	14312-89-1	-	-	-	0.18	0.02	-	-
Methyl perfluorooctanoate	376-27-2	-	-	-	0.13	0.02	-	-
Methyl perfluorononanoate	51502-45-5	-	-	-	0.06	8.2E-03	-	-
Methyl perfluorodecanoate	307-79-7	-	-	-	0.03	3.3E-03	-	-
Methyl perfluorododecanoate	56554-52-0	-	-	-	2.6E-03	3.3E-04	-	-
Methyl perfluorotetradecanoate	203302-99-2	-	-	-	5.2E-04	6.6E-05	-	-
Methyl perfluorohexadecanoate	165457-57-8	-	-	-	-	-	-	-
Dimethyl perfluorosuccinate	356-36-5	-	-	-	0.04	4.7E-03	1.4E-03	5.9E-03
Dimethyl perfluoroglutarate	1513-62-8	-	-	-	0.01	1.5E-03	-	-
Dimethyl perfluoroadipate	3107-98-0	-	-	-	7.9E-03	1.0E-03	-	-
Dimethyl perfluoro-3,6-dioxaoctane-1,8-dioate	24647-20-9	-	-	-	9.2E-03	1.2E-03	-	-
Methyl perfluoro-3,6,9-trioxadecanoate	169289-58-1	-	-	-	0.06	8.0E-03	-	-
Dimethyl perfluorosuberate	2062-20-6	-	-	-	4.7E-03	6.1E-04	-	-
Dimethyl perfluoro-3,6,9-trioxadecane-1,11-dioate	35910-59-9	-	-	-	5.4E-03	7.0E-04	-	-
Methyl perfluoro-3,6-dioxadecanoate	129301-40-2	-	-	-	0.06	7.5E-03	-	-
Dimethyl perfluoroazalate	2216-90-1	-	-	-	2.7E-03	3.4E-04	-	-
Dimethyl perfluorosebacate	4590-24-3	-	-	-	2.6E-03	3.3E-04	-	-

PROPOSED EMISSIONS FOR FLORENCE SITE

Pollutant	CAS	ESL Source	Short-Term ESL (µg/m3)	Long-Term ESL (µg/m3)	EP3-3		FUG3-1	
					(lbs/hr)	(tons/yr)	(lbs/hr)	(tons/yr)
Methyl perfluoroundecanoate	203302-98-1	-	-	-	0.01	1.4E-03	-	-
Dimethyl perfluoro-1,12-decanedioate	84750-88-9	-	-	-	8.0E-03	1.0E-03	-	-
Perfluoropolyethylene	-	-	-	-	-	-	-	-
Methanol	67-56-1	TAMIS	3900.00	2100.00	0.32	0.04	0.05	0.20
Methyl perfluoro-3,6-dioxahexanoate	39187-41-2	-	-	-	0.19	0.03	-	-
Methyl perfluoro-3,6,9-trioxatridecanoate	330562-42-0	-	-	-	0.02	2.4E-03	-	-
Isopropyl Alcohol	67-63-0	TAMIS	4920.00	492.00	-	-	-	-
1H,1H-Perfluoro-1-pentanol	355-28-2	-	-	-	-	-	-	-
1H,1H-Perfluoro-1-hexanol	423-46-1	-	-	-	-	-	-	-
1H,1H-Perfluoro-1-heptanol	375-82-6	-	-	-	-	-	-	-
1H,1H-Perfluoro-1-octanol	307-30-2	-	-	-	-	-	-	-
1H,1H-Perfluoro-1-nonanol	423-56-3	-	-	-	-	-	-	-
1H,1H-Perfluoro-1-decanol	307-37-9	-	-	-	-	-	-	-
1H,1H-Perfluoro-1-undecanol	307-46-0	-	-	-	-	-	-	-
1H,1H-Perfluoro-1-dodecanol	423-65-4	-	-	-	-	-	-	-
1H,1H-Perfluoro-1-tetradecanol	15622-57-8	-	-	-	-	-	-	-
Perfluoro-3,7-dimethyloctan-1-ol	232587-50-7	-	-	-	-	-	-	-
1H,1H,4H,4H-Perfluoro-1,4-butanediol	425-61-6	-	-	-	-	-	-	-
1H,1H,5H,5H-Perfluoro-1,5-pentanediol	376-90-9	-	-	-	-	-	-	-
1H,1H,6H,6H-Perfluoro-1,6-hexanediol	355-74-8	-	-	-	-	-	-	-
1H,1H,8H,8H-Perfluoro-1,8-octanediol	90177-96-1	-	-	-	-	-	-	-
1H,1H,9H,9H-Perfluoro-1,9-nonanediol	203303-01-9	-	-	-	-	-	-	-
1H,1H,10H,10H-Perfluoro-1,10-decanediol	754-96-1	-	-	-	-	-	-	-
1H,1H,12H,12H-Perfluoro-1,12-dodecanediol	183162-43-8	-	-	-	-	-	-	-
Perfluoro-tert-butanol	2378-02-1	2008 Email	1000.00	100.00	-	-	-	-
Fluorinated diethylene glycol monomethyl ether	330562-43-1	-	-	-	-	-	-	-
Fluorinated triethylene glycol monomethyl ether	147492-57-7	-	-	-	-	-	-	-
Fluorinated diethylene glycol monobutyl ether	152914-73-3	-	-	-	-	-	-	-
Fluorinated triethylene glycol monobutyl ether	317817-24-6	-	-	-	-	-	-	-
Fluorinated triethylene glycol	129301-42-4	-	-	-	-	-	-	-
Fluorinated tetraethylene glycol	330562-44-2	-	-	-	-	-	-	-
Perfluoropentanoic acid	2706-90-3	-	-	-	-	-	-	-
Perfluorohexanoic acid	307-24-4	-	-	-	-	-	-	-
Perfluoroheptanoic acid	375-85-9	-	-	-	-	-	-	-
Perfluorooctanoic acid	335-67-1	TAMIS	0.05	0.01	-	-	-	-
Perfluorononanoic acid	375-95-1	-	-	-	-	-	-	-
Perfluorodecanoic acid	335-76-2	2008 Email	14.00	1.40	-	-	-	-
Perfluoroundecanoic acid	2058-94-8	-	-	-	-	-	-	-
Perfluorododecanoic acid	307-55-1	-	-	-	-	-	-	-
Perfluorododecanedioic acid	865-85-0	-	-	-	-	-	-	-
Perfluorotetradecanoic acid	376-06-7	-	-	-	-	-	-	-
Perfluorohexadecanoic acid	67905-19-5	-	-	-	-	-	-	-
Perfluorosuccinic acid	377-38-9	-	-	-	-	-	-	-
Perfluoroglutaric acid	376-73-8	-	-	-	-	-	-	-
Perfluoro-3,6-dioxahexanoic acid	151772-58-6	-	-	-	-	-	-	-
Perfluoro-3,6-dioxaoctane-1,8-dioic acid	55621-21-1	-	-	-	-	-	-	-
Perfluoro-3,6,9-trioxadecanoic acid	151772-59-7	-	-	-	-	-	-	-
Perfluorosuberic acid	678-45-5	-	-	-	-	-	-	-
Perfluoro-3,6-dioxadecanoic acid	137780-89-9	-	-	-	-	-	-	-
Perfluoro-3,6,9-trioxadecane-1,11-dioic acid	55621-18-6	-	-	-	-	-	-	-
Perfluoroazelaic acid	23453-64-7	-	-	-	-	-	-	-
Perfluoro-3,7-dimethyloctanoic acid	172155-07-8	-	-	-	-	-	-	-
Perfluorosebacic acid	307-78-8	-	-	-	-	-	-	-
Bromine	7726-95-6	TAMIS	7.00	0.70	-	-	0.14	0.60
Perfluorohexyl bromide	335-56-8	-	-	-	-	-	-	-
Perfluoroheptyl bromide	375-88-2	-	-	-	-	-	-	-
Perfluorononyl bromide	558-96-3	-	-	-	-	-	-	-
Perfluorodecyl bromide	307-43-7	-	-	-	-	-	-	-
Perfluoro-1,4-dibromobutane	335-48-8	-	-	-	-	-	-	-
Perfluoro-1,8-dibromooctane	918-22-9	-	-	-	-	-	-	-
Perfluoro-1,8-dibromooctane	812-58-8	-	-	-	-	-	-	-
Perfluoro-2,5,8-trioxanonyl bromide	330562-45-3	-	-	-	-	-	-	-
Perfluoro-2,5-dioxanonyl bromide	330562-46-4	-	-	-	-	-	-	-
Perfluoro-2,5,8-trioxadodecyl bromide	330562-47-5	-	-	-	-	-	-	-
Perfluoro-1,6-dibromo-2,5-dioxahexane	330562-48-6	-	-	-	-	-	-	-
Perfluoro-1,9-dibromo-2,5,8-trioxanonane	330562-49-7	-	-	-	-	-	-	-
polymers of chlorotrifluoroethylene (PCTFE)	9002-83-9	2008 Email	1000.00	100.00	0.17	0.01	0.03	0.12
Toluene	108-88-3	TAMIS	4500.00	1200.00	-	-	-	-
Butylated Hydroxytoluene	128-37-0	TAMIS	Must Meet NAAQS	Must Meet NAAQS	-	-	-	-
PDO Diol	-	-	-	-	-	-	-	-
Perfluorosuccinic anhydride	699-30-9	-	-	-	-	-	-	-
Perfluoroglutaric anhydride	376-68-1	-	-	-	-	-	-	-
Acrylic Acid	79-10-7	TAMIS	60.00	6.00	-	-	-	-
1H,1H-Perfluoro-n-octyl acrylate	307-98-2	-	-	-	-	-	-	-

PROPOSED EMISSIONS FOR FLORENCE SITE

Pollutant	CAS	ESL Source	Short-Term ESL (µg/m3)	Long-Term ESL (µg/m3)	EP3-3		FUG3-1	
					(lbs/hr)	(tons/yr)	(lbs/hr)	(tons/yr)
1H,1H-Perfluoro-n-decyl acrylate	335-83-1	-	-	-	-	-	-	-
1H,1H-Perfluoro-n-octyl methacrylate	3934-23-4	-	-	-	-	-	-	-
1H,1H-Perfluoro-n-decyl methacrylate	23069-32-1	-	-	-	-	-	-	-
1H,1H,6H-Perfluoro-1,6-hexanediol diacrylate	2264-01-9	-	-	-	-	-	-	-
Perfluoro-[15]-crown-5 ether	97571-69-2	-	-	-	-	-	-	-
Fluorinated PTMG 250 Dial	146191-87-9	-	-	-	-	-	0.04	0.19
Hydrogen Chloride	7647-01-0	TAMIS	190.00	7.90	-	-	-	-
Fluorinated Poly (Trimethylene Glycol)	-	-	-	-	-	-	1.4E-03	5.9E-03
Tetraethylene glycol dimethyl ether	143-24-8	-	-	-	-	-	-	-
Perfluoro(Diethylene Glycol Monoisobutyl Ether)	1423231-12-2	-	-	-	-	-	-	-
Perfluorocyclohexyl methanol	28788-68-3	-	-	-	-	-	-	-
Perfluoro(Polyethylene Glycol 400),-CH2OH terminated	146222-54-0	-	-	-	-	-	-	-
Ethyl acetate	141-78-6	TAMIS	3100.00	1440.00	-	-	-	-
Perfluoro-t-butylcyclohexane	84808-64-0	2008 Email	200.00	20.00	-	-	2.9E-03	0.01
1,1,2-Trichloro-1,2,2-trifluoroethane	76-13-1	TAMIS	38000.00	3800.00	-	-	0.05	0.20
Perfluorobutryl Fluoride	335-42-2	-	-	-	-	-	2.7E-03	0.01
Perfluoropropane	76-19-7	TAMIS	10000.00	1000.00	-	-	0.05	0.20
Carbon tetrafluoride	75-73-0	TAMIS	18000.00	1800.00	-	-	-	-
Tetrahydrofuran	109-99-9	TAMIS	1500.00	150.00	-	-	-	-
Acid Fluorides	-	-	-	-	-	-	0.06	0.24
Hydrogen Bromide	10035-10-6	TAMIS	100.00	10.00	-	-	-	-
Oxides of Nitrogen	10102-43-9	-	Must Meet NAAQS	Must Meet NAAQS	-	-	-	-
Carbon Monoxide	630-08-0	-	Must Meet NAAQS	Must Meet NAAQS	-	-	-	-
Particulate Matter (PM ₁₀ , PM _{2.5})	-	-	Must Meet NAAQS	Must Meet NAAQS	-	-	-	-

PROPOSED EMISSIONS FOR FLORENCE SITE

Pollutant	CAS	ESL Source	Short-Term ESL (µg/m3)	Long-Term ESL (µg/m3)	FUG3-2		FUG3-3	
					(lbs/hr)	(tons/yr)	(lbs/hr)	(tons/yr)
Hydrogen Fluoride	7664-39-3	TAMIS	18.00	8.70	-	-	-	-
Hydrogen Fluoride (Agriculture)	7664-39-3	TAMIS	3.00	0.60	-	-	-	-
Hydrogen Fluoride (Agriculture with Cattle)	7664-39-3	TAMIS	n/a	0.75	-	-	-	-
Difluorine	7782-41-4	TAMIS	2.00	0.20	-	-	-	-
Carbonyl Fluoride	353-50-4	TAMIS	17.00	8.10	-	-	-	-
Carbonyl Fluoride (Agriculture)	353-50-4	TAMIS	2.80	0.57	-	-	-	-
Carbonyl Fluoride (Agriculture with Cattle)	353-50-4	TAMIS	n/a	0.71	-	-	-	-
Acetyl Fluorides	354-34-7	2008 Email	200.00	20.00	-	-	-	-
Trifluoroacetic acid	76-05-1	TAMIS	17.00	8.10	-	-	-	-
Trifluoroacetic acid (Agriculture)	76-05-1	TAMIS	2.80	0.57	-	-	-	-
Trifluoroacetic acid (Agriculture with Cattle)	76-05-1	TAMIS	n/a	0.71	-	-	-	-
Perfluoropentanoyl fluoride	375-62-2	-	-	-	-	-	-	-
Perfluorohexanoyl fluoride	355-38-4	-	-	-	-	-	-	-
Perfluoroheptanoyl fluoride	375-84-8	-	-	-	-	-	-	-
Perfluorooctanoyl Fluoride	335-66-0	-	-	-	-	-	-	-
Perfluorononanoyl fluoride	558-95-2	-	-	-	-	-	-	-
Perfluorodecyl fluoride	594-98-9	2008 Email	200.00	20.00	-	-	-	-
Perfluorosuccinoyl fluoride	679-13-0	-	-	-	-	-	-	-
Hexafluoroglutaroyl fluoride	678-78-4	-	-	-	-	-	-	-
Octafluoroadipoyl fluoride	37881-62-2	-	-	-	-	-	-	-
Perfluorosuberoyl fluoride	24647-09-4	-	-	-	-	-	-	-
Perfluorosebacoyl fluoride	-	-	-	-	-	-	-	-
Perfluorobutoxyethoxyacetyl fluoride	172897-75-5	-	-	-	-	-	-	-
Perfluorotriglycyl Fluoride	24647-19-6	-	-	-	-	-	-	-
Perfluoro-3,6,9-Trioxatridecanoyl Fluoride	883733-06-0	-	-	-	-	-	-	-
Perfluorotetraglycyl Fluoride	24689-56-3	-	-	-	-	-	-	-
Perfluoro-3,6,9-trioxatridecanoic acid	330562-41-9	-	-	-	-	-	-	-
Perfluoropolyethylene Glycol Glycyl fluoride	-	-	-	-	-	-	-	-
Perfluoropolytrimethylene acyl fluoride	-	-	-	-	-	-	-	-
Perfluoropolytetramethylene acyl fluoride	-	-	-	-	-	-	-	-
Perfluoropolydioxolane diacyl fluoride	-	-	-	-	-	-	-	-
Perfluorocyclohexyl carbonyl fluoride	6588-63-2	-	-	-	-	-	-	-
Perfluoropolyethylene Glycol Diol	-	-	-	-	-	-	5.4E-03	0.02
Perfluoropolydioxolane Diol	-	-	-	-	-	-	-	-
Perfluoro (polyethylene glycol) diacid fluoride	-	-	-	-	-	-	-	-
Perfluoro (polytrimethylene glycol) diacid fluoride	-	-	-	-	-	-	-	-
Perfluoro (polytetramethylene glycol) diacid fluoride	-	-	-	-	-	-	-	-
Perfluoropolydioxolane Diacid fluoride	882895-72-9	-	-	-	-	-	-	-
Tetrachlorohexafluorobutane	375-34-8	-	-	-	-	-	-	-
Pentachloropentafluorobutane	375-46-2	-	-	-	-	-	-	-
Hexachlorotetrafluorobutane	375-49-5	-	-	-	-	-	-	-
Perfluoro (bis-2-chloroethoxy methane)	130085-19-7	2008 Email	200.00	20.00	-	-	-	-
Perfluoropentane	678-26-2	-	-	-	-	-	-	-
Perfluorohexane	355-42-0	TAMIS	10000.00	1000.00	-	-	-	-
Perfluoroheptane	335-57-9	TAMIS	200.00	20.00	-	-	-	-
Perfluorooctane	307-34-6	2008 Email	20000.00	2000.00	-	-	-	-
Perfluorononane	375-96-2	-	-	-	-	-	-	-
Perfluorotridecane	376-03-4	-	-	-	-	-	-	-
Perfluoropentadecane	2264-03-1	-	-	-	-	-	-	-
Perfluorodecalin	306-94-5	2008 Email	200.00	20.00	-	-	-	-
Perfluoroperhydrophenanthrene	306-91-2	-	-	-	-	-	-	-
Perfluoromethyldecalin	306-92-3	-	-	-	-	-	-	-
Perfluorodimethylcyclohexane	306-98-9	-	-	-	-	-	-	-
Perfluoroperhydrofluorene	307-08-4	-	-	-	-	-	-	-
Perfluorodisopropylcyclohexane	75169-51-6	-	-	-	-	-	-	-
Perfluorooctyl bromide	423-55-2	-	-	-	-	-	-	-
Methyl perfluoropentanoate	13038-26-1	-	-	-	-	-	-	-
Methyl perfluorohexanoate	424-18-0	-	-	-	-	-	-	-
Methyl perfluoroheptanoate	14312-89-1	-	-	-	-	-	-	-
Methyl perfluorooctanoate	376-27-2	-	-	-	-	-	-	-
Methyl perfluorononanoate	51502-45-5	-	-	-	-	-	-	-
Methyl perfluorodecanoate	307-79-7	-	-	-	-	-	-	-
Methyl perfluorododecanoate	56554-52-0	-	-	-	-	-	-	-
Methyl perfluorotetradecanoate	203302-99-2	-	-	-	-	-	-	-
Methyl perfluorohexadecanoate	165457-57-8	-	-	-	-	-	-	-
Dimethyl perfluorosuccinate	356-36-5	-	-	-	6.9E-03	0.03	-	-
Dimethyl perfluoroglutarate	1513-62-8	-	-	-	-	-	-	-
Dimethyl perfluoroadipate	3107-98-0	-	-	-	-	-	-	-
Dimethyl perfluoro-3,6-dioxaoctane-1,8-dioate	24647-20-9	-	-	-	-	-	-	-
Methyl perfluoro-3,6,9-trioxadecanoate	169289-58-1	-	-	-	-	-	-	-
Dimethyl perfluorosuberate	2062-20-6	-	-	-	-	-	-	-
Dimethyl perfluoro-3,6,9-trioxadecane-1,11-dioate	35910-59-9	-	-	-	-	-	-	-
Methyl perfluoro-3,6-dioxadecanoate	129301-40-2	-	-	-	-	-	-	-
Dimethyl perfluoroazellate	2216-90-1	-	-	-	-	-	-	-
Dimethyl perfluorosebacate	4590-24-3	-	-	-	-	-	-	-

PROPOSED EMISSIONS FOR FLORENCE SITE

Pollutant	CAS	ESL Source	Short-Term ESL (µg/m3)	Long-Term ESL (µg/m3)	FUG3-2		FUG3-3	
					(lbs/hr)	(tons/yr)	(lbs/hr)	(tons/yr)
Methyl perfluoroundecanoate	203302-98-1	-	-	-	-	-	-	-
Dimethyl perfluoro-1,12-decanedioate	84750-88-9	-	-	-	-	-	-	-
Perfluoropolyethylene	-	-	-	-	-	-	-	-
Methanol	67-56-1	TAMIS	3900.00	2100.00	-	-	-	-
Methyl perfluoro-3,6-dioxaheptanoate	39187-41-2	-	-	-	-	-	-	-
Methyl perfluoro-3,6,9-trioxatridecanoate	330562-42-0	-	-	-	-	-	-	-
Isopropyl Alcohol	67-63-0	TAMIS	4920.00	492.00	-	-	-	-
1H,1H-Perfluoro-1-pentanol	355-28-2	-	-	-	-	-	-	-
1H,1H-Perfluoro-1-hexanol	423-46-1	-	-	-	-	-	-	-
1H,1H-Perfluoro-1-heptanol	375-82-6	-	-	-	-	-	-	-
1H,1H-Perfluoro-1-octanol	307-30-2	-	-	-	-	-	-	-
1H,1H-Perfluoro-1-nonanol	423-56-3	-	-	-	-	-	-	-
1H,1H-Perfluoro-1-decanol	307-37-9	-	-	-	-	-	-	-
1H,1H-Perfluoro-1-undecanol	307-46-0	-	-	-	-	-	-	-
1H,1H-Perfluoro-1-dodecanol	423-65-4	-	-	-	-	-	-	-
1H,1H-Perfluoro-1-tetradecanol	15622-57-8	-	-	-	-	-	-	-
Perfluoro-3,7-dimethyloctan-1-ol	232587-50-7	-	-	-	-	-	-	-
1H,1H,4H,4H-Perfluoro-1,4-butanediol	425-61-6	-	-	-	-	-	-	-
1H,1H,5H,5H-Perfluoro-1,5-pentanediol	376-90-9	-	-	-	-	-	-	-
1H,1H,6H,6H-Perfluoro-1,6-hexanediol	355-74-8	-	-	-	-	-	-	-
1H,1H,8H,8H-Perfluoro-1,8-octanediol	90177-96-1	-	-	-	-	-	-	-
1H,1H,9H,9H-Perfluoro-1,9-nonanediol	203303-01-9	-	-	-	-	-	-	-
1H,1H,10H,10H-Perfluoro-1,10-decanediol	754-96-1	-	-	-	-	-	-	-
1H,1H,12H,12H-Perfluoro-1,12-dodecanediol	183162-43-8	-	-	-	-	-	-	-
Perfluoro-tert-butanol	2378-02-1	2008 Email	1000.00	100.00	-	-	-	-
Fluorinated diethylene glycol monomethyl ether	330562-43-1	-	-	-	-	-	-	-
Fluorinated triethylene glycol monomethyl ether	147492-57-7	-	-	-	-	-	-	-
Fluorinated diethylene glycol monobutyl ether	152914-73-3	-	-	-	-	-	-	-
Fluorinated triethylene glycol monobutyl ether	317817-24-6	-	-	-	-	-	-	-
Fluorinated triethylene glycol	129301-42-4	-	-	-	-	-	-	-
Fluorinated tetraethylene glycol	330562-44-2	-	-	-	-	-	-	-
Perfluoropentanoic acid	2706-90-3	-	-	-	-	-	-	-
Perfluorohexanoic acid	307-24-4	-	-	-	-	-	-	-
Perfluoroheptanoic acid	375-85-9	-	-	-	-	-	-	-
Perfluorooctanoic acid	335-67-1	TAMIS	0.05	0.01	-	-	-	-
Perfluorononanoic acid	375-95-1	-	-	-	-	-	-	-
Perfluorodecanoic acid	335-76-2	2008 Email	14.00	1.40	-	-	-	-
Perfluoroundecanoic acid	2058-94-8	-	-	-	-	-	-	-
Perfluorododecanoic acid	307-55-1	-	-	-	-	-	-	-
Perfluorododecanedioic acid	865-85-0	-	-	-	-	-	-	-
Perfluorotetradecanoic acid	376-06-7	-	-	-	-	-	-	-
Perfluorohexadecanoic acid	67905-19-5	-	-	-	-	-	-	-
Perfluorosuccinic acid	377-38-8	-	-	-	-	-	-	-
Perfluoroglutaric acid	376-73-8	-	-	-	-	-	-	-
Perfluoro-3,6-dioxaheptanoic acid	151772-58-6	-	-	-	-	-	-	-
Perfluoroazepic acid	336-08-3	-	-	-	-	-	-	-
Perfluoro-3,6-dioxaoctane-1,8-dioic acid	55621-21-1	-	-	-	-	-	-	-
Perfluoro-3,6,9-trioxadecanoic acid	151772-59-7	-	-	-	-	-	-	-
Perfluorosuberic acid	678-45-5	-	-	-	-	-	-	-
Perfluoro-3,6-dioxadecanoic acid	137780-69-9	-	-	-	-	-	-	-
Perfluoro-3,6,9-trioxaundecane-1,11-dioic acid	55621-18-6	-	-	-	-	-	-	-
Perfluoroazelaic acid	23453-64-7	-	-	-	-	-	-	-
Perfluoro-3,7-dimethylcyclohexanoic acid	172155-07-8	-	-	-	-	-	-	-
Perfluorosebacic acid	307-78-8	-	-	-	-	-	-	-
Bromine	7726-95-6	TAMIS	7.00	0.70	-	-	-	-
Perfluorohexyl bromide	335-56-8	-	-	-	-	-	-	-
Perfluoroheptyl bromide	375-88-2	-	-	-	-	-	-	-
Perfluorononyl bromide	558-96-3	-	-	-	-	-	-	-
Perfluorodecyl bromide	307-43-7	-	-	-	-	-	-	-
Perfluoro-1,4-dibromobutane	335-48-8	-	-	-	-	-	-	-
Perfluoro-1,6-dibromohexane	918-22-9	-	-	-	-	-	-	-
Perfluoro-1,8-dibromooctane	812-58-8	-	-	-	-	-	-	-
Perfluoro-2,5,8-trioxanonyl bromide	330562-45-3	-	-	-	-	-	-	-
Perfluoro-2,5-dioxanonyl bromide	330562-46-4	-	-	-	-	-	-	-
Perfluoro-2,5,8-trioxadodecyl bromide	330562-47-5	-	-	-	-	-	-	-
Perfluoro-1,6-dibromo-2,5-dioxahexane	330562-48-6	-	-	-	-	-	-	-
Perfluoro-1,9-dibromo-2,5,8-trioxanonane	330562-49-7	-	-	-	-	-	-	-
polymers of chlorotrifluoroethylene (PCTFE)	9002-83-9	2008 Email	1000.00	100.00	-	-	-	-
Toluene	108-88-3	TAMIS	4500.00	1200.00	-	-	-	-
Butylated Hydroxytoluene	128-37-0	TAMIS	Must Meet NAAQS	Must Meet NAAQS	-	-	-	-
PDO Diol	-	-	-	-	-	-	-	-
Perfluorosuccinic anhydride	699-30-9	-	-	-	-	-	-	-
Perfluoroglutaric anhydride	376-68-1	-	-	-	-	-	-	-
Acrylic Acid	79-10-7	TAMIS	60.00	6.00	-	-	-	-
1H,1H-Perfluoro-n-octyl acrylate	307-98-2	-	-	-	-	-	-	-

PROPOSED EMISSIONS FOR FLORENCE SITE

Pollutant	CAS	ESL Source	Short-Term ESL (µg/m3)	Long-Term ESL (µg/m3)	FUG3-2		FUG3-3	
					(lbs/hr)	(tons/yr)	(lbs/hr)	(tons/yr)
1H,1H-Perfluoro-n-decyl acrylate	335-83-1	-	-	-	-	-	-	-
1H,1H-Perfluoro-n-octyl methacrylate	3934-23-4	-	-	-	-	-	-	-
1H,1H-Perfluoro-n-decyl methacrylate	23069-32-1	-	-	-	-	-	-	-
1H,1H,6H-Perfluoro-1,6-hexanediol diacrylate	2264-01-9	-	-	-	-	-	-	-
Perfluoro-[15]-crown-5 ether	97571-69-2	-	-	-	-	-	-	-
Fluorinated PTMG 250 Diol	146191-87-9	-	-	-	-	-	-	-
Hydrogen Chloride	7647-01-0	TAMIS	190.00	7.90	7.5E-03	0.03	3.6E-03	0.02
Fluorinated Poly (Trimethylene Glycol)	-	-	-	-	-	-	-	-
Tetraethylene glycol dimethyl ether	143-24-8	-	-	-	-	-	-	-
Perfluoro(Diethylene Glycol Monoisobutyl Ether)	1423231-12-2	-	-	-	-	-	-	-
Perfluorocyclohexyl methanol	28788-68-3	-	-	-	-	-	-	-
Perfluoro(Polyethylene Glycol 400),-CH2OH terminated	146222-54-0	-	-	-	-	-	-	-
Ethyl acetate	141-78-6	TAMIS	3100.00	1440.00	8.1E-03	0.04	-	-
Perfluoro-t-butylcyclohexane	84808-64-0	2008 Email	200.00	20.00	-	-	-	-
1,1,2-Trichloro-1,2,2-trifluoroethane	76-13-1	TAMIS	38000.00	3800.00	-	-	-	-
Perfluorobutryl Fluoride	335-42-2	-	-	-	-	-	-	-
Perfluoropropane	76-19-7	TAMIS	10000.00	1000.00	-	-	-	-
Carbon tetrafluoride	75-73-0	TAMIS	18000.00	1800.00	-	-	-	-
Tetrahydrofuran	109-99-9	TAMIS	1500.00	150.00	0.02	0.07	0.02	0.10
Acid Fluorides	-	-	-	-	-	-	-	-
Hydrogen Bromide	10035-10-6	TAMIS	100.00	10.00	-	-	-	-
Oxides of Nitrogen	10102-43-9	*	Must Meet NAAQS	Must Meet NAAQS	-	-	-	-
Carbon Monoxide	630-08-0	-	Must Meet NAAQS	Must Meet NAAQS	-	-	-	-
Particulate Matter (PM ₁₀ , PM _{2.5})	-	*	Must Meet NAAQS	Must Meet NAAQS	-	-	-	-

PROPOSED EMISSIONS FOR FLORENCE SITE

Pollutant	CAS	ESL Source	Short-Term ESL (µg/m3)	Long-Term ESL (µg/m3)	FUG3-4	
					(lbs/hr)	(tons/yr)
Hydrogen Fluoride	7664-39-3	TAMIS	18.00	8.70	-	-
Hydrogen Fluoride (Agriculture)	7664-39-3	TAMIS	3.00	0.60	-	-
Hydrogen Fluoride (Agriculture with Cattle)	7664-39-3	TAMIS	n/a	0.75	-	-
Difluorine	7782-41-4	TAMIS	2.00	0.20	-	-
Carbonyl Fluoride	353-50-4	TAMIS	17.00	8.10	-	-
Carbonyl Fluoride (Agriculture)	353-50-4	TAMIS	2.80	0.57	-	-
Carbonyl Fluoride (Agriculture with Cattle)	353-50-4	TAMIS	n/a	0.71	-	-
Acetyl Fluorides	354-34-7	2008 Email	200.00	20.00	-	-
Trifluoroacetic acid	76-05-1	TAMIS	17.00	8.10	-	-
Trifluoroacetic acid (Agriculture)	76-05-1	TAMIS	2.80	0.57	-	-
Trifluoroacetic acid (Agriculture with Cattle)	76-05-1	TAMIS	n/a	0.71	-	-
Perfluoropentanoyl fluoride	375-62-2	-	-	-	-	-
Perfluorohexanoyl fluoride	355-38-4	-	-	-	-	-
Perfluoroheptanoyl fluoride	375-84-8	-	-	-	-	-
Perfluorooctanoyl Fluoride	335-66-0	-	-	-	-	-
Perfluorononanoyl fluoride	558-95-2	-	-	-	-	-
Perfluorodecyl fluoride	594-98-9	2008 Email	200.00	20.00	-	-
Perfluorosuccinoyl fluoride	679-13-0	-	-	-	-	-
Hexafluoroglutaroyl fluoride	678-78-4	-	-	-	-	-
Octafluoroadipoyl fluoride	37881-62-2	-	-	-	-	-
Perfluorosuberoyl fluoride	24647-09-4	-	-	-	-	-
Perfluorosebacoyl fluoride	-	-	-	-	-	-
Perfluorobutoxyethoxyacetyl fluoride	172897-75-5	-	-	-	-	-
Perfluorotriglycyl Fluoride	24647-19-6	-	-	-	-	-
Perfluoro-3,6,9-Trioxatridecanoyl Fluoride	883733-06-0	-	-	-	-	-
Perfluorotetraglycyl Fluoride	24689-56-3	-	-	-	-	-
Perfluoro-3,6,9-trioxatridecanoic acid	330562-41-9	-	-	-	-	-
Perfluoropolyethylene Glycol Glycyl fluoride	-	-	-	-	-	-
Perfluoropolytrimethylene acyl fluoride	-	-	-	-	-	-
Perfluoropolytetramethylene acyl fluoride	-	-	-	-	-	-
Perfluoropolydioxolane diacyl fluoride	-	-	-	-	-	-
Perfluorocyclohexyl carbonyl fluoride	6588-63-2	-	-	-	-	-
Perfluoropolyethylene Glycol Diol	-	-	-	-	-	-
Perfluoropolydioxolane Diol	-	-	-	-	-	-
Perfluoro (polyethylene glycol) diacid fluoride	-	-	-	-	-	-
Perfluoro (polytrimethylene glycol) diacid fluoride	-	-	-	-	-	-
Perfluoro (polytetramethylene glycol) diacid fluoride	-	-	-	-	-	-
Perfluoropolydioxolane Diacid fluoride	882695-72-9	-	-	-	-	-
Tetrachlorohexafluorobutane	375-34-8	-	-	-	-	-
Pentachloropentafluorobutane	375-46-2	-	-	-	-	-
Hexachlorotetrafluorobutane	375-49-5	-	-	-	-	-
Perfluoro (bis-2-chloroethoxy methane)	130085-19-7	2008 Email	200.00	20.00	-	-
Perfluoropentane	678-26-2	-	-	-	-	-
Perfluorohexane	355-42-0	TAMIS	10000.00	1000.00	-	-
Perfluoroheptane	335-57-9	TAMIS	200.00	20.00	-	-
Perfluorooctane	307-34-6	2008 Email	20000.00	2000.00	-	-
Perfluorononane	375-96-2	-	-	-	-	-
Perfluorotridecane	376-03-4	-	-	-	-	-
Perfluoropentadecane	2264-03-1	-	-	-	-	-
Perfluorodecalin	306-94-5	2008 Email	200.00	20.00	-	-
Perfluoroperhydrophenanthrene	306-91-2	-	-	-	-	-
Perfluoromethyldecalin	306-92-3	-	-	-	-	-
Perfluorodimethylcyclohexane	306-98-9	-	-	-	-	-
Perfluoroperhydrofluorene	307-08-4	-	-	-	-	-
Perfluoro-diisopropylcyclohexane	75169-51-6	-	-	-	-	-
Perfluorooctyl bromide	423-55-2	-	-	-	-	-
Methyl perfluoropentanoate	13038-26-1	-	-	-	-	-
Methyl perfluorohexanoate	424-18-0	-	-	-	-	-
Methyl perfluoroheptanoate	14312-89-1	-	-	-	-	-
Methyl perfluorooctanoate	376-27-2	-	-	-	-	-
Methyl perfluorononanoate	51502-45-5	-	-	-	-	-
Methyl perfluorodecanoate	307-79-7	-	-	-	-	-
Methyl perfluorododecanoate	56554-52-0	-	-	-	-	-
Methyl perfluorotetradecanoate	203302-99-2	-	-	-	-	-
Methyl perfluorohexadecanoate	165457-57-8	-	-	-	-	-
Dimethyl perfluorosuccinate	356-36-5	-	-	-	-	-
Dimethyl perfluoroglutarate	1513-62-8	-	-	-	-	-
Dimethyl perfluoroadipate	3107-98-0	-	-	-	-	-
Dimethyl perfluoro-3,6-dioxaoctane-1,8-dioate	24647-20-9	-	-	-	-	-
Methyl perfluoro-3,6,9-trioxadecanoate	169289-58-1	-	-	-	-	-
Dimethyl perfluorosuberate	2062-20-6	-	-	-	-	-
Dimethyl perfluoro-3,6,9-trioxadecane-1,11-dioate	35910-59-9	-	-	-	-	-
Methyl perfluoro-3,6-dioxadecanoate	129301-40-2	-	-	-	-	-
Dimethyl perfluoroazelate	2216-90-1	-	-	-	-	-
Dimethyl perfluorosebacate	4590-24-3	-	-	-	-	-

PROPOSED EMISSIONS FOR FLORENCE SITE

Pollutant	CAS	ESL Source	Short-Term ESL (µg/m3)	Long-Term ESL (µg/m3)	FUG3-4	
					(lbs/hr)	(tons/yr)
Methyl perfluoroundecanoate	203302-98-1	-	-	-	-	-
Dimethyl perfluoro-1,12-decanedioate	84750-88-9	-	-	-	-	-
Perfluoropolyethylene	-	-	-	-	-	-
Methanol	67-56-1	TAMIS	3900.00	2100.00	-	-
Methyl perfluoro-3,6-dioxahexanoate	39187-41-2	-	-	-	-	-
Methyl perfluoro-3,6,9-trioxatridecanoate	330562-42-0	-	-	-	-	-
Isopropyl Alcohol	67-63-0	TAMIS	4920.00	492.00	-	-
1H,1H-Perfluoro-1-pentanol	355-28-2	-	-	-	-	-
1H,1H-Perfluoro-1-hexanol	423-46-1	-	-	-	-	-
1H,1H-Perfluoro-1-heptanol	375-82-6	-	-	-	-	-
1H,1H-Perfluoro-1-octanol	307-30-2	-	-	-	-	-
1H,1H-Perfluoro-1-nonanol	423-56-3	-	-	-	-	-
1H,1H-Perfluoro-1-decanol	307-37-9	-	-	-	-	-
1H,1H-Perfluoro-1-undecanol	307-46-0	-	-	-	-	-
1H,1H-Perfluoro-1-dodecanol	423-65-4	-	-	-	-	-
1H,1H-Perfluoro-1-tetradecanol	15622-57-8	-	-	-	-	-
Perfluoro-3,7-dimethyloctan-1-ol	232587-50-7	-	-	-	-	-
1H,1H,4H,4H-Perfluoro-1,4-butanediol	425-61-6	-	-	-	-	-
1H,1H,5H,5H-Perfluoro-1,5-pentanediol	376-90-9	-	-	-	-	-
1H,1H,6H,6H-Perfluoro-1,6-hexanediol	355-74-8	-	-	-	-	-
1H,1H,8H,8H-Perfluoro-1,8-octanediol	90177-96-1	-	-	-	-	-
1H,1H,9H,9H-Perfluoro-1,9-nonanediol	203303-01-9	-	-	-	-	-
1H,1H,10H,10H-Perfluoro-1,10-decanediol	754-96-1	-	-	-	-	-
1H,1H,12H,12H-Perfluoro-1,12-dodecanediol	183162-43-8	-	-	-	-	-
Perfluoro-tert-butanol	2376-02-1	2008 Email	1000.00	100.00	-	-
Fluorinated diethylene glycol monomethyl ether	330562-43-1	-	-	-	-	-
Fluorinated triethylene glycol monomethyl ether	147492-57-7	-	-	-	-	-
Fluorinated diethylene glycol monobutyl ether	152914-73-3	-	-	-	-	-
Fluorinated triethylene glycol monobutyl ether	317817-24-6	-	-	-	-	-
Fluorinated triethylene glycol	129301-42-4	-	-	-	-	-
Fluorinated tetraethylene glycol	330562-44-2	-	-	-	-	-
Perfluoropentanoic acid	2706-90-3	-	-	-	-	-
Perfluorohexanoic acid	307-24-4	-	-	-	-	-
Perfluoroheptanoic acid	375-85-9	-	-	-	-	-
Perfluorooctanoic acid	335-67-1	TAMIS	0.05	0.01	-	-
Perfluorononanoic acid	375-95-1	-	-	-	-	-
Perfluorodecanoic acid	335-76-2	2008 Email	14.00	1.40	-	-
Perfluoroundecanoic acid	2058-94-8	-	-	-	-	-
Perfluorododecanoic acid	307-55-1	-	-	-	-	-
Perfluorododecanedioic acid	865-85-0	-	-	-	-	-
Perfluorotetradecanoic acid	376-06-7	-	-	-	-	-
Perfluorohexadecanoic acid	67905-19-5	-	-	-	-	-
Perfluorosuccinic acid	377-38-8	-	-	-	-	-
Perfluoroglutaric acid	376-73-8	-	-	-	-	-
Perfluoro-3,6-dioxahexanoic acid	151772-58-6	-	-	-	-	-
Perfluoroadipic acid	336-08-3	-	-	-	-	-
Perfluoro-3,6-dioxaoctane-1,8-dioic acid	55621-21-1	-	-	-	-	-
Perfluoro-3,6,9-trioxadecanoic acid	151772-59-7	-	-	-	-	-
Perfluorosuberic acid	678-45-5	-	-	-	-	-
Perfluoro-3,6-dioxadecanoic acid	137780-69-9	-	-	-	-	-
Perfluoro-3,6,9-trioxadecane-1,11-dioic acid	55621-18-6	-	-	-	-	-
Perfluoroazelaic acid	23453-64-7	-	-	-	-	-
Perfluoro-3,7-dimethyloctanoic acid	172155-07-8	-	-	-	-	-
Perfluorosebacic acid	307-78-8	-	-	-	-	-
Bromine	7726-95-6	TAMIS	7.00	0.70	-	-
Perfluorohexyl bromide	335-56-8	-	-	-	-	-
Perfluoroheptyl bromide	375-88-2	-	-	-	-	-
Perfluorononyl bromide	558-96-3	-	-	-	-	-
Perfluorodecyl bromide	307-43-7	-	-	-	-	-
Perfluoro-1,4-dibromobutane	335-48-8	-	-	-	-	-
Perfluoro-1,6-dibromohexane	918-22-9	-	-	-	-	-
Perfluoro-1,8-dibromooctane	812-58-8	-	-	-	-	-
Perfluoro-2,5,8-trioxanonyl bromide	330562-45-3	-	-	-	-	-
Perfluoro-2,5-dioxanonyl bromide	330562-46-4	-	-	-	-	-
Perfluoro-2,5,8-trioxadodecyl bromide	330562-47-5	-	-	-	-	-
Perfluoro-1,6-dibromo-2,5-dioxahexane	330562-48-6	-	-	-	-	-
Perfluoro-1,9-dibromo-2,5,8-trioxanonane	330562-49-7	-	-	-	-	-
polymers of chlorotrifluoroethylene (PCTFE)	9002-83-9	2008 Email	1000.00	100.00	-	-
Toluene	108-88-3	TAMIS	4500.00	1200.00	-	-
Butylated Hydroxytoluene	128-37-0	TAMIS	Must Meet NAAQS	Must Meet NAAQS	-	-
PDO Diol	-	-	-	-	-	-
Perfluorosuccinic anhydride	699-30-9	-	-	-	-	-
Perfluoroglutaric anhydride	376-68-1	-	-	-	-	-
Acrylic Acid	79-10-7	TAMIS	60.00	6.00	-	-
1H,1H-Perfluoro-n-octyl acrylate	307-98-2	-	-	-	-	-

PROPOSED EMISSIONS FOR FLORENCE SITE

Pollutant	CAS	ESL Source	Short-Term ESL (µg/m3)	Long-Term ESL (µg/m3)	FUG3-4	
					(lbs/hr)	(tons/yr)
1H,1H-Perfluoro-n-decyl acrylate	335-83-1	-	-	-	-	-
1H,1H-Perfluoro-n-octyl methacrylate	3934-23-4	-	-	-	-	-
1H,1H-Perfluoro-n-decyl methacrylate	23069-32-1	-	-	-	-	-
1H,1H,6H,6H-Perfluoro-1,6-hexanediol diacrylate	2264-01-9	-	-	-	-	-
Perfluoro-[15]-crown-5 ether	97571-69-2	-	-	-	-	-
Fluorinated PTMG 250 Diol	146191-87-9	-	-	-	3.5E-03	0.02
Hydrogen Chloride	7647-01-0	TAMIS	190.00	7.90	3.1E-03	0.01
Fluorinated Poly (Trimethylene Glycol)	-	-	-	-	3.5E-03	0.02
Tetraethylene glycol dimethyl ether	143-24-8	-	-	-	9.6E-03	0.04
Perfluoro(Diethylene Glycol Monoisobutyl Ether)	1423231-12-2	-	-	-	9.5E-03	0.04
Perfluorocyclohexyl methanol	28788-68-3	-	-	-	8.8E-03	0.04
Perfluoro(Polyethylene Glycol 400),-CH2OH terminated	146222-54-0	-	-	-	4.1E-03	0.02
Ethyl acetate	141-78-6	TAMIS	3100.00	1440.00	-	-
Perfluoro-t-butylcyclohexane	84808-64-0	2008 Email	200.00	20.00	-	-
1,1,2-Trichloro-1,2,2-trifluoroethane	76-13-1	TAMIS	38000.00	3800.00	-	-
Perfluorobutryl Fluoride	335-42-2	-	-	-	-	-
Perfluoropropane	76-19-7	TAMIS	10000.00	1000.00	-	-
Carbon tetrafluoride	75-73-0	TAMIS	18000.00	1800.00	-	-
Tetrahydrofuran	109-99-9	TAMIS	1500.00	150.00	0.02	0.08
Acid Fluorides	-	-	-	-	-	-
Hydrogen Bromide	10035-10-6	TAMIS	100.00	10.00	-	-
Oxides of Nitrogen	10102-43-9	-	Must Meet NAAQS	Must Meet NAAQS	-	-
Carbon Monoxide	630-08-0	-	Must Meet NAAQS	Must Meet NAAQS	-	-
Particulate Matter (PM ₁₀ , PM _{2.5})	-	-	Must Meet NAAQS	Must Meet NAAQS	-	-

Modeling Inputs - Point Source Parameters

FIN	EPN	Description	Modeling EPN		UTM		Elevation		Release Height		Diameter		Velocity		Temp	
			EPN	Zone	East	North	(m)	(m)	(ft)	(m)	(ft)	(m)	(ft)	(m/s)	(ft/s)	(°F)
EP3-1	EP3-1	Exhaust Gas Vent System (w/ Raincap)	EP31	14	604,666	3,407,123	332	40.0	12.19	0.50	0.1524	7.266	2.2147	80.0	299.8	

Modeling Inputs - Volume Source Parameters

FIN	EPN	Description	Modeling EPN		UTM		Elevation		Vol. Side Length		Building Height		Release Height (H)		σ _{no}		Volume Source Type
			EPN	Zone	East	North	(m)	(m)	(ft)	(m)	(ft)	(m)	(ft)	(m)	(m)		
EP3-2	EP3-2	Washing Reactor 1	EP32	14	604,670	3,407,115	332	1.50	0.46	30.0	9.1	4.50	1.37	0.106	4.253	Elevated Adjacent to Structure	
EP3-3	EP3-3	Washing Reactor 2	EP33	14	604,669	3,407,117	332	1.83	0.56	30.0	9.1	4.50	1.37	0.130	4.253	Elevated Adjacent to Structure	
FUG3-1	FUG3-1	Building 3 Fugitives	FUG31	14	604,691	3,407,124	332	120.0	36.58	30.0	9.1	10.0	3.05	8.506	4.253	Elevated Adjacent to Structure	
FUG3-2	FUG3-2	Reduction Reactor 1 Fug	FUG32	14	604,675	3,407,111	332	3.28	1.00	30.0	9.1	3.28	1.00	0.233	4.253	Elevated Adjacent to Structure	
FUG3-3	FUG3-3	Reduction Reactor 2 Fug	FUG33	14	604,673	3,407,112	332	3.28	1.00	30.0	9.1	4.17	1.27	0.233	4.253	Elevated Adjacent to Structure	
FUG3-4	FUG3-4	Reduction Reactor 3 Fug	FUG34	14	604,672	3,407,114	332	3.28	1.00	30.0	9.1	3.28	1.00	0.233	4.253	Elevated Adjacent to Structure	

Application Exhibit 10

Applicant's Comments on the Electronic Modeling Evaluation Workbook (EMEW) Review Response



November 5, 2021

Ms. Cara Hill
Air Permits Division, MC 163
Texas Commission on Environmental Quality
P.O. Box 13087
Austin, TX 78711-3087

Submitted via Email

Re: Exflur Research Corporation
Permit Application No. 165848
NSR Project No. 331049
ADMT Project No. 7452
Regulated Entity No. RN110969227
Customer No. CN602696791

Dear Ms. Hill:

On behalf of Exflur Research Corporation (Exflur), I am submitting this letter to address the comments of the July 23, 2021 Initial Electronic Modeling Evaluation Workbook (EMEW) Review Response conducted by Ms. Jasleen Dhilon. Detailed responses for each of the items of the review are included in the following discussion.

Should you have any questions regarding this submittal or require additional information, please do not hesitate to contact Mr. Arloe Fontenot at (512) 310-9044.

Sincerely,

A handwritten signature in blue ink, appearing to read "Joerg Windolph".

Joerg Windolph, P.E.
Principal Engineer

JOW/tpv

Attachments

cc: Air Program Director, TCEQ Region 11, Austin, w/attachments

ATTACHMENT A

RESPONSES TO INITIAL MODELING EMEW REVIEW

1. General

Administrative Information:

Be sure to include NSR Project No. 331049 and Permit No. 165848 for the Facility Information's Project Number and Permit Number, respectively, in the final submittal.

Exfluor's Response

The NSR Project No. 331049 and Permit No. 165848 were added to the EMEW.

2. Additional Attachments

The ADMT could not verify the UIM calculations as this additional attachment was not provided. Please be sure to provide this attachment in the final modeling submittal. If possible, please provide the attachment in an electronic spreadsheet format.

Exfluor's Response

The UIM calculations were provided on October 18, 2021 with the updated modeling analysis. The calculations were uploaded to TCEQs ftp site.

The supplemental report notes 136 health effects pollutants were excluded from the analysis because they do not have ESLs in the TAMIS database. Please coordinate with the permit reviewer as they will need to verify this with toxicology.

Exfluor's Response

Exfluor will coordinate with the permit reviewer whether the assumption to exclude 136 health effects pollutant from the modeling analysis is acceptable. The 136 pollutants were excluded because they do not have ESLs in the TAMIS database.

Please provide justification for the non-industrial location chosen for the site-wide difluorine/fluorine analysis. From the surrounding land use description and aerial photography, it appears the site is mainly surrounded by non-industrial land, but the selected non-industrial location is about 350m east of the property line.

Exfluor's Response

Most of the land around the Florence site appears to be uninhabited and undeveloped land. The chances of someone being in that area and exposed to any of the pollutants emitted from the Florence site are very low. Aerial imagery and "street-view" imagery of the land east of the Florence Site indicate a small vineyard that was recently established. Exfluor

believes that the vineyard is the closest location at which the public could be exposed to the pollutants emitted from the Florence site.

In the supplemental report, Model ID EP31 is characterized as an “exhaust gas vent system with raincap.” Please include this information in the EMEW’s Point Source Parameters tab.

Exflur’s Response

The Exhaust Gas Vent System (Model ID EP31) will not have a rain cap. Thus, the EMEW’s Point Source Parameters tab was not revised.

3. Model Options

A. Type of Model Used:

Please be sure to input the model version number in the final modeling analysis. Be aware the latest version of AERMOD is 21112.

Exflur’s Response

The model version number 21112 was added to Section II.A of the EMEW.

F. Determination of Surface Roughness:

As “Other” is selected for the Month/Season Assignment, please include assignment information in the cell below the statement.

Exflur’s Response

The selection of “Other” for the Month/Season Assignment to determine the surface roughness is incorrect. The correct assignment is “Default”. The EMEW was corrected to include the correct assignment method of “Default”.

4. Speciated Emissions

Please include the ESL documentation email for the “Other (Please specify)” pollutants.

Exflur’s Response

The ESL documentation emails for the “Other” pollutants are attached.

5. NAAQS/State Property Line Modeling Results

Although preliminary results were provided, the modeling files were not submitted for review. Therefore, the reported results could not be verified. It is recommended for future submittals that the applicant provide the preliminary modeling files with the EMEW for review.

Exflur's Response

The modeling files were uploaded to TCEQs ftp site on October 18, 2021.

6. Unit Impact Multipliers

Although preliminary results were provided, the modeling files were not submitted for review. Therefore, the reported results could not be verified. It is recommended for future submittals that the applicant provide the preliminary modeling files with the EMEW for review.

Exflur's Response

The Unit Impact Multipliers were added to the EMEW which was uploaded to TCEQs ftp site on October 18, 2021.

7. Health Effects Modeling Results

Although preliminary results were provided, the modeling files were not submitted for review. Therefore, the reported results could not be verified. It is recommended for future submittals that the applicant provide the preliminary modeling files with the EMEW for review.

Exflur's Response

The modeling files were uploaded to TCEQs ftp site on October 18, 2021.

Please delete the entry in row 24 under the Step 6 column as the pollutant meets step 3 of the MERA.

Exflur's Response

The entry in row 24 (hydrogen fluoride) under Step 6 column was deleted. The revised EMEW was uploaded to TCEQs ftp site on October 18, 2021.

It appears several pollutants went on to step 7 of the MERA but were not reported in the EMEW. Please report the GLCmax at step 7 in the EMEW, even if it is the same as the GLCmax at step 3.

Exflur's Response

The final EMEW reports the GLCmax at step 7 for all pollutants which required plant-wide modeling. The revised EMEW was uploaded to TCEQs ftp site on October 18, 2021.

8. Modeling File Names

Be sure to completely fill out the Modeling File Name tab (including downwash files, AERSURFACE run, etc.) with the final submittal of the EMEW.

Exflur's Response

The Modeling File Name tab is completely filled out in the final EMEW. All modeling files were uploaded to TCEQ's ftp site on October 18, 2021.

Compounds for which ESLs are needed

Compound	CAS #	Formula	S.T. ESL (ug/m3)		L.T. ESL (ug/m3)
			50 (as PM); 1000 (as vapor)	5 (as PM); 100 (as vapor)	
Polychlorotrifluoroethylene (PCTFE)	9002-83-9	[CF ₂ CClF] _n			
1,10-decanediol	112-47-0	HO(CH ₂) ₁₀ OH	50	5	5
Perfluorodecanoic acid	335-76-2	CF ₃ (CF ₂) ₈ CO ₂ H	14	1.4	1.4
Perfluorohexane	335-57-9	C ₇ F ₁₆	200	20	20
Perfluorodecalin	306-94-5	C ₁₀ F ₁₈	200	20	20
Trifluoroacetyl fluoride (Perfluoroacetyl fluoride)	354-34-7	CF ₃ -COF	200	20	20
perfluorobutyl fluoride		CF ₃ (CF ₂) ₂ -COF	200	20	20
perfluoropentyl fluoride		CF ₃ (CF ₂) ₃ -COF	200	20	20
perfluorohexyl fluoride		CF ₃ (CF ₂) ₄ -COF	200	20	20
perfluoroheptyl fluoride		CF ₃ (CF ₂) ₅ -COF	200	20	20
perfluorooctyl fluoride		CF ₃ (CF ₂) ₆ -COF	200	20	20
perfluorononyl fluoride		CF ₃ (CF ₂) ₇ -COF	200	20	20
perfluorodecyl fluoride		CF ₃ (CF ₂) ₈ -COF	200	20	20
perfluorosuccinyl fluoride		FOC-(CF ₂) ₂ -COF	200	20	20
perfluoroglutaryl fluoride		FOC-(CF ₂) ₃ -COF	200	20	20
perfluoroadipoyl fluoride		FOC-(CF ₂) ₄ -COF	200	20	20
perfluorosebacyl fluoride		FOC-(CF ₂) ₈ -COF	200	20	20
Perfluorodiisopropyl cyclohexane			200	20	20
Perfluoro-t-butylcyclohexane			200	20	20
Perfluorodimethyl naphthalene (also known as perfluoroperhydrodimethyl naphthalene)			200	20	20
92 Solvent (Ethane, 1,1'-[difluoromethylenebis(oxy)]bis[2-chloro- 1,1,2,2-tetrafluoro-])	130085-19-7	CF ₂ ClCF ₂ OOCF ₂ OOCF ₂ Cl	200	20	20

From: [Manny Reyna](#)
To: [Christopher L. Bauer](#)
Cc: [Justin Cherry](#); [Jong-Song Lee](#)
Subject: Re: Compounds for Which ESLs are Needed
Date: Thursday, October 30, 2008 10:55:59 AM
Attachments: [List of Compounds for ESLs \(2\).xls](#)

The requested ESLs are attached.

>>> "Christopher L. Bauer" <CBauer@WAID.com> 10/30/2008 9:29 AM >>>

I was just informed that the compound shown in Cell A23 of the spreadsheet that I sent to you yesterday should have been shown as Perfluorodimethyl naphthalene (also known as perfluoroperhydrodimethyl naphthalene) instead of Perfluorodimethyl naphthalene. The corrected spreadsheet is attached. My apology for any inconvenience this may have caused. Please let me know if you have any questions or need additional information.

Thanks,

Chris L. Bauer, P.E.
Senior Consulting Engineer
Waid and Associates
14205 N Mopac Expy., Suite 600
Austin, TX 78728
(512) 255-9999 ext. 219 Fax: (512) 255-8780 Mobile (512) 497-5313
<http://www.waid.com> email: cbauer@waid.com

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From: Christopher L. Bauer
Sent: Wednesday, October 29, 2008 3:16 PM
To: 'Manny Reyna'
Subject: FW: Compounds for Which ESLs are Needed

Last month you provided the ESLs in the attached spreadsheet. I now need ESLs for three additional compounds which have been added at the bottom of the list. I have also attached an ESL request form. Please let me know if you need additional information.

Also, the ESLs you provided for PCTFE (50 µg/m³ short-term and 5 µg/m³ long-term) were lower than expected since the material is believed to be of very low toxicity. I have attached the MSDS for Halocarbon 0.8 Oil which is composed of PCTFE. Section VI of this MSDS (the Health Hazard Data section) indicates that there were no effects on rats at 2650 ppm (34.3 mg/L; i.e., 34,300 mg/m³ or 34,300,000 µg/m³). The MSDS also states that the material is considered by OSHA definition to be nontoxic. Does this information provide an adequate basis for increasing the ESL for this compound?

Thanks,

Chris L. Bauer, P.E.
Senior Consulting Engineer
Waid and Associates
14205 N Mopac Expy., Suite 600
Austin, TX 78728

(512) 255-9999 ext. 219 Fax: (512) 255-8780 Mobile (512) 497-5313
<http://www.waid.com> email: cbauer@waid.com

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From: Manny Reyna [mailto:MReyna@tceq.state.tx.us]
Sent: Thursday, September 18, 2008 10:29 AM
To: Christopher L. Bauer
Cc: Justin Cherry; Jong-Song Lee
Subject: RE: Compounds for Which ESLs are Needed

See attached.

>>> "Christopher L. Bauer" <CBauer@WAID.com> 9/17/2008 5:58 PM >>>
Please see attachment. Please let me know if additional information is needed. Thank you.

Chris L. Bauer, P.E.
Senior Consulting Engineer
Waid and Associates
14205 N Mopac Expy., Suite 600
Austin, TX 78728
(512) 255-9999 ext. 219 Fax: (512) 255-8780 Mobile (512) 497-5313
<http://www.waid.com> email: cbauer@waid.com

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From: Manny Reyna [mailto:MReyna@tceq.state.tx.us]
Sent: Wednesday, September 17, 2008 3:30 PM
To: Christopher L. Bauer
Subject: Re: Compounds for Which ESLs are Needed

Please fill out and return the attached ESL request form. Thank you.

>>> "Christopher L. Bauer" <CBauer@WAID.com> 9/17/2008 3:18 PM >>>
Manny,

Please provide ESLs for the compounds listed in the attachment. Please let me know if you have any questions.

Thanks,

Chris L. Bauer, P.E.
Senior Consulting Engineer
Waid and Associates
14205 N Mopac Expy., Suite 600
Austin, TX 78728

(512) 255-9999 ext. 219 Fax: (512) 255-8780 Mobile (512) 497-5313
<http://www.waid.com> email: cbauer@waid.com

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From: [Manny Reyna](#)
To: [Christopher L. Bauer](#)
Subject: Re: Effects Screening Level Request
Date: Thursday, August 6, 2009 2:59:59 PM
Attachments: [List of Compounds for ESLs.xls](#)

Please see the attached.

>>> "Christopher L. Bauer" <CBauer@WAID.com> 8/5/2009 9:37 AM >>>
Mr. Reyna,

Please provide Effects Screening Levels for the chemicals in the attached list. I have also attached an ESL Derivation Request Form in case you need that.

Three of the compounds in the attached list, perfluoroheptane, perfluorooctane and perfluorononane, are believed to be nontoxic or to have a very low toxicity, similar to the completely fluorinated perfluoroethane which has a short-term ESL of 28,000 µg/m³. The compounds perfluorohexane and perfluorooctane are used for medical applications. One of the companies that sells these types of compounds for a variety of medical applications, F2 Chemicals, has a website that provides some information on these applications and on the very low toxicity of these types of compounds. A link to their website is provided below. Perfluoroheptane and perfluorononane are also essentially nontoxic and could be used in a variety of medical applications. Please let me know if you need additional information with regard to these chemicals.

http://www.fluoros.co.uk/data/medical_applications.php

Thank you for your help with these ESL values.

Regards,

Chris L. Bauer, P.E.
Principal Engineer
Waid Environmental
14205 N Mopac Expy., Suite 600
Austin, TX 78728
(512) 255-9999 ext. 219 Fax: (512) 255-8780 Mobile (512) 497-5313
<http://www.waid.com> email: cbauer@waid.com

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Compounds for Which ESLs are Needed

Chemical Name	Molecular Formula	MW	CAS RN	Will an ESL of > 2 $\mu\text{g}/\text{m}^3$ suffice?	Short-term ESL ($\mu\text{g}/\text{m}^3$)	Long-term ESL ($\mu\text{g}/\text{m}^3$)
Perfluoropentanoic acid	C5HF9O2	264	2706-90-3	Yes	>2	0.2
Perfluorohexanoic acid	C6HF11O2	314	307-24-4	Yes	>2	0.2
Perfluoroheptanoic acid	C7HF13O2	364	375-85-9	Yes	>2	0.2
Perfluorooctanoic acid	C8HF15O2	414	335-67-1	Yes	>2	0.2
Perfluorononanoic acid	C9HF17O2	464	375-95-1	Yes	>2	0.2
Perfluoroundecanoic acid	C11HF21O2	564	2058-94-8	Yes	>2	0.2
Perfluorododecanoic acid	C12HF23O2	614	307-55-1	Yes	>2	0.2
Perfluorotetradecanoic acid	C14HF27O2	714	376-06-7	Yes	>2	0.2
Perfluorohexadecanoic acid	C16HF31O2	814	67905-19-5	Yes	>2	0.2
Perfluoro-3,5,5-trimethylhexanoic acid	C9HF17O2	464	238403-51-5	Yes	>2	0.2
Perfluoro-3,7-dimethyloctanoic acid	C10HF19O2	514	172155-07-6	Yes	>2	0.2
Perfluorosuccinic acid	C4H2F4O4	190	377-38-8	Yes	>2	0.2
Perfluoroglutaric acid	C5H2F6O4	240	376-73-8	Yes	>2	0.2
Perfluoroadipic acid	C6H2F8O4	290	336-08-3	Yes	>2	0.2
Perfluorosuberic acid	C8H2F12O4	390	678-45-5	Yes	>2	0.2
Perfluoroazelaic acid	C9H2F14O4	440	23453-64-7	Yes	>2	0.2
Perfluorosebacic acid	C10H2F16O4	490	307-78-8	Yes	>2	0.2
Perfluorododecanedioic acid	C12H2F20O4	590	865-85-0	Yes	>2	0.2
Perfluoro-3,6,9-trioxadecanoic acid	C7HF13O5	412	151772-59-7	Yes	>2	0.2
Perfluoro-3,6-dioxadecanoic acid	C8HF15O4	446	137780-69-9	Yes	>2	0.2
Perfluoro-3,6,9-trioxatridecanoic acid	C10HF19O5	562	330562-41-9	Yes	>2	0.2
Perfluoro-3,6-dioxaoctane-1,8-dioic acid	C6H2F8O6	322	55621-21-1	Yes	>2	0.2
Perfluoro-3,6,9-trioxaundecane-1,11-dioic acid	C8H2F12O7	438	55621-18-6	Yes	>2	0.2
Perfluoroheptanoyl fluoride	C7F14O	366	375-84-8	Yes	>2	0.2
Perfluorobutoxyethoxyacetyl fluoride	C8F16O3	448	172897-75-5	Yes	>2	0.2
Perfluoro-3,6-dioxaoctanedioyl difluoride	C6F10O4	326	24647-19-6	Yes	>2	0.2
Perfluoro-3,6,9-trioxaundecanedioyl difluoride	C8F14O5	442	24689-56-3	Yes	>2	0.2
1H,1H-Perfluoro-n-octyl acrylate	C11H5F15O2	454	307-98-2	Yes	>2	0.2
1H,1H-Perfluoro-n-decyl acrylate	C13H5F19O2	554	335-83-1	Yes	>2	0.2
1H,1H-Perfluoro-n-octyl methacrylate	C12H7F15O2	468	3934-23-4	Yes	>2	0.2
1H,1H-Perfluoro-n-decyl methacrylate	C14H7F19O2	568	23069-32-1	Yes	>2	0.2
1H,1H,6H,6H-Perfluoro-1,6-hexanediol diacrylate	C12H10F8O4	370	2264-01-9	Yes	>2	0.2
1H,1H-Perfluoro-1-hexanol	C6H3F11O	300	423-46-1	Yes	>2	0.2
1H,1H-Perfluoro-1-heptanol	C7H3F13O	350	375-82-6	Yes	>2	0.2
1H,1H-Perfluoro-1-octanol	C8H3F15O	400	307-30-2	Yes	>2	0.2
1H,1H-Perfluoro-1-nonanol	C9H3F17O	450	423-56-3	Yes	>2	0.2
1H,1H-Perfluoro-1-decanol	C10H3F19O	500	307-37-9	Yes	>2	0.2
1H,1H-Perfluoro-1-undecanol	C11H3F21O	550	307-46-0	Yes	>2	0.2
1H,1H-Perfluoro-1-dodecanol	C12H3F23O	600	423-65-4	Yes	>2	0.2
1H,1H-Perfluoro-1-tetradecanol	C14H3F27O	700	15622-57-8	Yes	>2	0.2
Perfluoro-3,5,5-trimethylhexan-1-ol	C9H3F17O	450	232267-34-4	Yes	>2	0.2
Perfluoro-3,7-dimethyloctan-1-ol	C10H3F19O	500	232587-50-7	Yes	>2	0.2
1H,1H,4H,4H-Perfluoro-1,4-butanediol	C4H6F4O2	162	425-61-6	Yes	>2	0.2
1H,1H,5H,5H-Perfluoro-1,5-pentanediol	C5H6F6O2	212	376-90-9	Yes	>2	0.2
1H,1H,6H,6H-Perfluoro-1,6-hexanediol	C6H6F8O2	262	355-74-8	Yes	>2	0.2
1H,1H,8H,8H-Perfluoro-1,8-octanediol	C8H6F12O2	362	90177-96-1	Yes	>2	0.2

Compounds for Which ESLs are Needed

Chemical Name	Molecular Formula	MW	CAS RN	Will an ESL of > 2 $\mu\text{g}/\text{m}^3$ suffice?	Short-term ESL ($\mu\text{g}/\text{m}^3$)	Long-term ESL ($\mu\text{g}/\text{m}^3$)
1H,1H,9H,9H-Perfluoro-1,9-nonanediol	C9H6F14O2	412	203303-01-9	Yes	>2	0.2
1H,1H,10H,10H-Perfluoro-1,10-decanediol	C10H6F16O2	462	754-96-1	Yes	>2	0.2
1H,1H,12H,12H-Perfluoro-1,12-dodecanediol	C12H6F20O2	562	183162-43-8	Yes	>2	0.2
Perfluoro-tert-butanol	C4HF9O	236	2378-02-1	No	1,000	100
Fluorinated diethylene glycol monomethyl ether	C5H3F9O3	282	330562-43-1	Yes	>2	0.2
Fluorinated triethylene glycol monomethyl ether	C7H3F13O4	398	147492-57-7	Yes	>2	0.2
Fluorinated diethylene glycol monobutyl ether	C8H3F15O3	432	152914-73-3	Yes	>2	0.2
Fluorinated triethylene glycol monobutyl ether	C10H3F19O4	548	317817-24-6	Yes	>2	0.2
Fluorinated triethylene glycol	C6H6F8O4	294	129301-42-4	Yes	>2	0.2
Fluorinated tetraethylene glycol	C8H6F12O5	410	330562-44-2	Yes	>2	0.2
Perfluoroheptane	C7F16	388	335-57-9	No	20,000	2,000
Perfluorooctane	C8F18	438	307-34-6	No	20,000	2,000
Perfluorononane	C9F20	488	375-96-2	Yes	>2	0.2
Perfluorosuccinic anhydride	C4F4O3	172	699-30-9	Yes	>2	0.2
Perfluoroglutaric anhydride	C5F6O3	222	376-68-1	Yes	>2	0.2
Perfluorohexyl bromide; Perfluoro-1-bromohexane	C6BrF13	399	335-56-8	Yes	>2	0.2
Perfluoroheptyl bromide; Perfluoro-1-bromoheptane	C7BrF15	449	375-88-2	Yes	>2	0.2
Perfluorooctyl bromide; Perfluoro-1-bromooctane	C8BrF17	499	423-55-2	Yes	>2	0.2
Perfluorononyl bromide; Perfluoro-1-bromononane	C9BrF19	549	558-96-3	Yes	>2	0.2
Perfluoro-1,4-dibromobutane	C4Br2F8	360	335-48-8	Yes	>2	0.2
Perfluoro-1,6-dibromohexane	C6Br2F12	460	918-22-9	Yes	>2	0.2
Perfluoro-1,8-dibromooctane	C8Br2F16	560	812-58-8	Yes	>2	0.2
Perfluoro-2,5,8-trioxanonyl bromide	C6F13O3Br	447	330562-45-3	Yes	>2	0.2
Perfluoro-2,5-dioxanonyl bromide	C7F15O2Br	481	330562-46-4	Yes	>2	0.2
Perfluoro-2,5,8-trioxadodecyl bromide	C9F19O3Br	597	330562-47-5	Yes	>2	0.2
Perfluoro-1,6-dibromo-2,5-dioxahexane	C4F8O2Br2	392	330562-48-6	Yes	>2	0.2
Perfluoro-1,9-dibromo-2,5,8-trioxanonane	C6F12O3Br2	508	330562-49-7	Yes	>2	0.2
Methyl perfluoropentanoate	C6H3F9O2	278	13038-26-1	Yes	>2	0.2
Methyl perfluorohexanoate	C7H3F11O2	328	424-18-0	Yes	>2	0.2
Methyl perfluoroheptanoate	C8H3F13O2	378	14312-89-1	Yes	>2	0.2
Methyl perfluorooctanoate	C9H3F15O2	428	376-27-2	Yes	>2	0.2
Methyl perfluorononanoate	C10H3F17O2	478	51502-45-5	Yes	>2	0.2
Methyl perfluorodecanoate	C11H3F19O2	528	307-79-7	Yes	>2	0.2
Methyl perfluorododecanoate	C13H3F23O2	628	56554-52-0	Yes	>2	0.2
Methyl perfluorotetradecanoate	C15H3F27O2	728	203302-99-2	Yes	>2	0.2
Methyl perfluorohexadecanoate	C17H3F31O2	828	165457-57-8	Yes	>2	0.2
Dimethyl perfluorosuccinate	C6H6F4O4	218	356-36-5	Yes	>2	0.2
Perfluoro-[15]-crown-5 ether	C10F20O5	580	97571-69-2	Yes	>2	0.2

From: Joerg Windolph
Sent: Friday, November 5, 2021 8:23 AM
To: Cara Hill <Cara.Hill@Tceq.Texas.Gov>
Cc: arloe.fontenot@exfluor.com
Subject: RE: Initial EMEW Review Response - Exfluor Research Corporation - Permit No. 331049

Cara,

As you requested, attached is a response to the initial EMEW review. Please let us know if you have any other question.

Thank you,

Joerg Windolph, P.E.
Principal Engineer

Waid Environmental

13785 Research Blvd., Suite 100

Austin, Texas 78750

Office: 512-255-9999

Cell: 512-550-8147

<http://www.waid.com>

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From: Cara Hill <Cara.Hill@Tceq.Texas.Gov>
Sent: Wednesday, November 3, 2021 4:02 PM
To: Joerg Windolph <JWindolph@WAID.com>
Subject: RE: Initial EMEW Review Response - Exfluor Research Corporation - Permit No. 331049

Yes, that would be great if you can get it to us as soon as you can.

Thanks,
Cara

How is our customer service? www.tceq.texas.gov/customersurvey

From: Joerg Windolph <JWindolph@WAID.com>
Sent: Wednesday, November 3, 2021 2:30 PM
To: Cara Hill <Cara.Hill@Tceq.Texas.Gov>
Subject: RE: Initial EMEW Review Response - Exfluor Research Corporation - Permit No. 331049

Cara,

I don't think that we have submitted a response to the initial EMEW review since you had not requested it yet. We can prepare and provide you a response if you would like for us to do that. APP-00381

Just let me know and I will get started on it.

Thanks,

Joerg Windolph, P.E.

Principal Engineer

Waid Environmental

13785 Research Blvd., Suite 100

Austin, Texas 78750

Office: 512-255-9999

Cell: 512-550-8147

<http://www.waid.com>

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From: Cara Hill <Cara.Hill@Tceq.Texas.Gov>

Sent: Wednesday, November 3, 2021 2:02 PM

To: Joerg Windolph <JWindolph@WAID.com>

Subject: FW: Initial EMEW Review Response - Exflur Research Corporation - Permit No. 331049

Hi Joerg,

Do you know if a response to the initial EMEW review was done? I didn't see it in any of my files

and I was thinking it may have been in the first modeling FTP upload that we couldn't download.

Thanks,

Cara

From: Jasleen Dhillon <Jasleen.Dhillon@tceq.texas.gov>

Sent: Thursday, July 22, 2021 10:14 AM

To: Steven DeNero <SDeNero@WAID.com>

Cc: Cara Hill <Cara.Hill@Tceq.Texas.Gov>; bierschenk_t@exflur.com

Subject: Initial EMEW Review Response - Exflur Research Corporation - Permit No. 331049

Good Morning,

Please see the attached Initial EMEW Review Response for Exflur Research Corporation (Permit No. 165848, NSR Project No. 331049). Be sure to address the comments with the final submittal of the EMEW once requested by the permit reviewer.

Feel free to contact me if you require any clarification or have any questions.

Thank you,

APP-00382

Jasleen Dhillon

Texas Commission on Environmental Quality
Office of Air, Air Permits Division
Air Dispersion Modeling Team
512-239-1252
Jasleen.Dhillon@tceq.texas.gov

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Application Exhibit 10A

EMEW Review Response

**CONFIDENTIAL MATERIALS FILED
SEPARATELY**

Application Exhibit 11

Response to TCEQ ED Request on 11/8/21
and 11/15/21 for Information Regarding the
Air Quality Analysis

From: Steven DeNero <SDeNero@WAID.com>
Sent: Tuesday, November 16, 2021 3:45 PM
To: Ahmed Omar <Ahmed.Omar@tceq.texas.gov>
Cc: Arloe Fontenot <arloe.fontenot@exfluoer.com>; Joerg Windolph <JWindolph@WAID.com>; Cara Hill <Cara.Hill@Tceq.Texas.Gov>
Subject: RE: Modeling audit - 165848 Exfluoer Research Corporation

Mr. Omar,

Exfluoer's responses are included below in-line with your questions.

Best,

Steven P. DeNero, M.S.
Sr. Air Dispersion Modeler
Waid Corporation dba Waid Environmental
Phone: 512 255 9999

From: Ahmed Omar <Ahmed.Omar@tceq.texas.gov>
Sent: Monday, November 15, 2021 2:36 PM
To: Steven DeNero <SDeNero@WAID.com>
Cc: Arloe Fontenot <arloe.fontenot@exfluoer.com>; Joerg Windolph <JWindolph@WAID.com>; Cara Hill <Cara.Hill@Tceq.Texas.Gov>
Subject: RE: Modeling audit - 165848 Exfluoer Research Corporation

Steve,

Please address the following items:

- 1- ADMT reviewed the submitted documentation and the correspondence with Toxicology division supporting the used ESLs and could not find the documentation supporting the ESL of Perfluoro (bis-2-chloroethoxy methane). Please address.

The CAS No. for this pollutant is 130085-19-7. This chemical was included in communication with TCEQ Toxicology in 2008. The chemical name used in the 2008 communication was "92 Solvent (Ethane,1,1'-[difluoromethylenebis(oxy)]bis[2-chloro-1,1,2,2-tetrafluoro-])". The ESL values used in the current modeling analysis match those created by TCEQ Toxicology in response to the 2008 request.

- 2- The GLC_{NI} for 1-hr fluorine was determined based on sensitive receptor only (e.g. resident homes or other non-industrial businesses). It appears the site is mainly surrounded by undeveloped land, therefore, any land not zoned industrial should be considered non-industrial. Also, the GLC_{NI} should not be limited to sensitive receptors only. Please address.

The impacts of fluorine (CAS No. 7782-41-4) were presented for both the GLC_{MAX} and the GLC_{NI}. The GLC_{MAX} was shown to exceed the ESL and is located on the property line of the proposed Florence site. Given the rural setting for this site, the analysis described that there is very low probability of a

member of the public actually experiencing these concentrations. Therefore, impacts at the nearest structure (a residence) were also presented to provide more context of the impacts. Additionally, the plot files and ESL-exceedance contour files were provided with the analysis showing all of these predicted impacts.

The following table provides Exceedance Counts for the GLC_{MAX}, which falls on the western property boundary of the proposed Florence Site. This is adjacent to undeveloped land and therefore, as you stated, should also be considered in non-industrial impacts reporting. The attached EMEW has also been updated with these values.

Location Description	Location	# Hours Above 1x ESL	# Hours Above 2x ESL
GLCmax	604562.85, 3407070.82	99	0

Please let me know if you have any question.

Thanks,

Ahmed Omar, P.E.

TCEQ, Air Permits Division
Air Dispersion Modeling Team
Ahmed.Omar@tceq.texas.gov
(512)-239-1285

From: Steven DeNero <SDeNero@WAID.com>
Sent: Wednesday, November 10, 2021 12:41 PM
To: Ahmed Omar <Ahmed.Omar@tceq.texas.gov>
Cc: Arloe Fontenot <arloe.fontenot@exfluoer.com>; Joerg Windolph <JWindolph@WAID.com>
Subject: RE: Modeling audit - 165848 Exfluoer Research Corporation

Mr. Omar,

Exfluoer's responses are included below in-line with your questions.

Best,

Steven P. DeNero, M.S.
Sr. Air Dispersion Modeler
Waid Corporation dba Waid Environmental
Phone: 512 255 9999

From: Ahmed Omar <Ahmed.Omar@tceq.texas.gov>

APP-00387

Sent: Monday, November 8, 2021 11:12 AM
To: Steven DeNero <SDeNero@WAID.com>
Cc: Cara Hill <Cara.Hill@Tceq.Texas.Gov>; [bierschenk t@exfluoer.com](mailto:bierschenk_t@exfluoer.com)
Subject: Modeling audit - 165848 Exfluoer Research Corporation

Steve,

After reviewing the AQA submitted by Exfluoer Research Corporation for permit No. 165848, the following items need to be addressed:

1- Provide the electronic version of the spreadsheet for UIMs calculations.
Please see the attached document.

2- The modeled area sources were not documented in the EMEW. Please explain.
The scaling files "Exfluoer.ADI" and "Exfluoer_Ag.ADI" included representations for EPNs EP3-4 and EP3-5 as area sources. These are not to be confused with the naming style of the fugitive sources, such as EPN FUG3-4. EPNs EP3-4 and EP3-5 (model IDs EP34 and EP35 respectively) were created early on in the analysis before the final emissions were established. Neither EP34 or EP35 were used in the final submitted analysis, but they remained in the modeling files as holdovers. Therefore they were not included in the EMEW. Please disregard these sources.

3- Volume source, source ID FUG35, was modeled; however, this source is not documented in EMEW. Please explain.
Similar to how EP34 and EP35 did not end up getting included in the analysis, EPN FUG3 5 (model ID FUG35) was also not used when the final emission rates were established for this project. Therefore, please also disregard this source.

Please let me know if you have any question.

Thanks,

Ahmed Omar, P.E.
TCEQ, Air Permits Division
Air Dispersion Modeling Team
Ahmed.Omar@tceq.texas.gov
(512)-239-1285

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From: [Manny Reyna](#)
To: [Christopher L. Bauer](#)
Cc: [Justin Cherry](#); [Jong-Song Lee](#)
Subject: Re: Compounds for Which ESLs are Needed
Date: Thursday, October 30, 2008 10:55:59 AM
Attachments: [List of Compounds for ESLs \(2\).xls](#)

The requested ESLs are attached.

>>> "Christopher L. Bauer" <CBauer@WAID.com> 10/30/2008 9:29 AM >>>
I was just informed that the compound shown in Cell A23 of the spreadsheet that I sent to you yesterday should have been shown as Perfluorodimethyl naphthalene (also known as perfluoroperhydrodimethyl naphthalene) instead of Perfluorodimethyl naphthalene. The corrected spreadsheet is attached. My apology for any inconvenience this may have caused. Please let me know if you have any questions or need additional information.

Thanks,

Chris L. Bauer, P.E.
Senior Consulting Engineer
Waid and Associates
14205 N Mopac Expy., Suite 600
Austin, TX 78728
(512) 255-9999 ext. 219 Fax: (512) 255-8780 Mobile (512) 497-5313
<http://www.waid.com> email: cbauer@waid.com

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From: Christopher L. Bauer
Sent: Wednesday, October 29, 2008 3:16 PM
To: 'Manny Reyna'
Subject: FW: Compounds for Which ESLs are Needed

Last month you provided the ESLs in the attached spreadsheet. I now need ESLs for three additional compounds which have been added at the bottom of the list. I have also attached an ESL request form. Please let me know if you need additional information.

Also, the ESLs you provided for PCTFE (50 µg/m³ short-term and 5 µg/m³ long-term) were lower than expected since the material is believed to be of very low toxicity. I have attached the MSDS for Halocarbon 0.8 Oil which is composed of PCTFE. Section VI of this MSDS (the Health Hazard Data section) indicates that there were no effects on rats at 2650 ppm (34.3 mg/L; i.e., 34,300 mg/m³ or 34,300,000 µg/m³). The MSDS also states that the material is considered by OSHA definition to be nontoxic. Does this information provide an adequate basis for increasing the ESL for this compound?

Thanks,

Chris L. Bauer, P.E.
Senior Consulting Engineer
Waid and Associates
14205 N Mopac Expy., Suite 600
Austin, TX 78728

(512) 255-9999 ext. 219 Fax: (512) 255-8780 Mobile (512) 497-5313
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From: Manny Reyna [mailto:MR Reyna@tceq.state.tx.us]
Sent: Thursday, September 18, 2008 10:29 AM
To: Christopher L. Bauer
Cc: Justin Cherry; Jong-Song Lee
Subject: RE: Compounds for Which ESLs are Needed

See attached.

>>> "Christopher L. Bauer" <CBauer@WAID.com> 9/17/2008 5:58 PM >>>
Please see attachment. Please let me know if additional information is needed. Thank you.

Chris L. Bauer, P.E.
Senior Consulting Engineer
Waid and Associates
14205 N Mopac Expy., Suite 600
Austin, TX 78728
(512) 255-9999 ext. 219 Fax: (512) 255-8780 Mobile (512) 497-5313
<http://www.waid.com> email: cbauer@waid.com

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From: Manny Reyna [mailto:MR Reyna@tceq.state.tx.us]
Sent: Wednesday, September 17, 2008 3:30 PM
To: Christopher L. Bauer
Subject: Re: Compounds for Which ESLs are Needed

Please fill out and return the attached ESL request form. Thank you.

>>> "Christopher L. Bauer" <CBauer@WAID.com> 9/17/2008 3:18 PM >>>
Manny,

Please provide ESLs for the compounds listed in the attachment. Please let me know if you have any questions.

Thanks,

Chris L. Bauer, P.E.
Senior Consulting Engineer
Waid and Associates
14205 N Mopac Expy., Suite 600
Austin, TX 78728

(512) 255-9999 ext. 219 Fax: (512) 255-8780 Mobile (512) 497-5313
<http://www.waid.com> email: cbauer@waid.com

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Compounds for which ESLs are needed

Compound	CAS #	Formula	S.T. ESL (ug/m ³) 50 (as PM); 1000 (as vapor)	L.T. ESL (ug/m ³) 5 (as PM); 100 (as vapor)
Polychlorotrifluoroethylene (PCTFE)	9002-83-9	[CF ₂ CClF] _n	50	5
1,10-decanediol	112-47-0	HO(CH ₂) ₁₀ OH	50	5
Perfluorodecanoic acid	335-76-2	CF ₃ (CF ₂) ₈ CO ₂ H	14	1.4
Perfluorohexane	335-57-9	C ₆ F ₁₄	200	20
Perfluorodecalin	306-94-5	C ₁₀ F ₁₈	200	20
Trifluoroacetyl fluoride (Perfluoroacetyl fluoride)	354-34-7	CF ₃ -COF	200	20
perfluorobutyl fluoride		CF ₃ (CF ₂) ₂ -COF	200	20
perfluoropentyl fluoride		CF ₃ (CF ₂) ₃ -COF	200	20
perfluorohexyl fluoride		CF ₃ (CF ₂) ₄ -COF	200	20
perfluoroheptyl fluoride		CF ₃ (CF ₂) ₅ -COF	200	20
perfluorooctyl fluoride		CF ₃ (CF ₂) ₆ -COF	200	20
perfluorononyl fluoride		CF ₃ (CF ₂) ₇ -COF	200	20
perfluorodecyl fluoride		CF ₃ (CF ₂) ₈ -COF	200	20
perfluorosuccinyl fluoride		FOC-(CF ₂) ₂ -COF	200	20
perfluoroglutaryl fluoride		FOC-(CF ₂) ₃ -COF	200	20
perfluoroadipoyl fluoride		FOC-(CF ₂) ₄ -COF	200	20
perfluorosebacyl fluoride		FOC-(CF ₂) ₆ -COF	200	20
Perfluorodisopropyl cyclohexane			200	20
Perfluoro-t-butylcyclohexane			200	20
Perfluorodimethyl naphthalene (also known as perfluoroperhydrodimethyl naphthalene)			200	20
92 Solvent (Ethane, 1,1'-[difluoromethylenebis(oxy)]bis[2-chloro- 1,1,2,2-tetrafluoro-])	130085-19-7	CF ₂ ClCF ₂ OOCF ₂ OOCF ₂ OOCF ₂ Cl	200	20

PROPOSED EMISSIONS FOR FLORENCE SITE

Pollutant	CAS	ESL Source	Short-Term ESL (µg/m³)	Long-Term ESL (µg/m³)	EP3-1		EP3-2	
					(lb/hr)	(ton/yr)	(lb/hr)	(ton/yr)
Hydrogen Fluoride	7664-39-3	TAMIS	18.00	8.70	7.4E-03	0.03	-	-
Hydrogen Fluoride (Agriculture)	7664-39-3	TAMIS	3.00	0.60	7.4E-03	0.03	-	-
Hydrogen Fluoride (Agriculture with Cattle)	7664-39-3	TAMIS	n/a	0.75	7.4E-03	0.03	-	-
Difluorine	7782-41-4	TAMIS	2.00	0.20	1.1E-04	5.0E-04	-	-
Carbonyl Fluoride	353-50-4	TAMIS	17.00	8.10	0.01	0.05	-	-
Carbonyl Fluoride (Agriculture)	353-50-4	TAMIS	2.80	0.57	0.01	0.05	-	-
Carbonyl Fluoride (Agriculture with Cattle)	353-50-4	TAMIS	n/a	0.71	0.01	0.05	-	-
Acetyl Fluorides	354-34-7	2008 Email	200.00	20.00	0.01	0.05	-	-
Trifluoroacetic acid	76-05-1	TAMIS	17.00	8.10	0.01	0.06	-	-
Trifluoroacetic acid (Agriculture)	76-05-1	TAMIS	2.80	0.57	0.01	0.06	-	-
Trifluoroacetic acid (Agriculture with Cattle)	76-05-1	TAMIS	n/a	0.71	0.01	0.06	-	-
Perfluoropentanoyl fluoride	375-62-2	-	-	-	0.02	0.04	-	-
Perfluorohexanoyl fluoride	355-38-4	-	-	-	0.02	0.04	-	-
Perfluoroheptanoyl fluoride	375-84-8	-	-	-	0.01	0.04	-	-
Perfluorooctanoyl fluoride	335-66-0	-	-	-	0.01	0.04	-	-
Perfluorononanoyl fluoride	558-95-2	-	-	-	0.01	0.04	-	-
Perfluorodecyl fluoride	584-98-9	2008 Email	200.00	20.00	0.01	0.04	-	-
Perfluoroundecyl fluoride	679-13-0	-	-	-	0.03	0.05	-	-
Perfluorododecyl fluoride	678-78-4	-	-	-	0.02	0.05	-	-
Octafluorodipropyl fluoride	37881-62-2	-	-	-	0.02	0.05	-	-
Perfluorooctyl fluoride	24647-09-4	-	-	-	0.01	0.05	-	-
Perfluorooctadecyl fluoride	172897-75-5	-	-	-	0.02	0.05	-	-
Perfluorobutoxyethoxyacetyl fluoride	24647-19-6	-	-	-	0.01	0.05	-	-
Perfluorotriethyl Glycol Fluoride	883733-06-0	-	-	-	0.01	0.05	-	-
Perfluoro-3,6,9-trioxadecanoyl Fluoride	24689-56-3	-	-	-	0.01	0.05	-	-
Perfluoro-3,6,9-trioxadecanoyl Fluoride	330562-41-9	-	-	-	0.01	0.05	-	-
Perfluoro-3,6,9-trioxadecanonic acid	-	-	-	-	0.01	0.05	-	-
Perfluoropolyethylene Glycol Glycyl fluoride	-	-	-	-	1.2E-05	6.0E-08	-	-
Perfluoropolyethylene acyl fluoride	-	-	-	-	1.2E-05	6.0E-08	-	-
Perfluoropolytetramethylene acyl fluoride	-	-	-	-	1.2E-05	6.1E-08	-	-
Perfluoropolyoxolane diacyl fluoride	-	-	-	-	0.02	0.04	-	-
Perfluorocyclohexyl carbonyl fluoride	65888-63-2	-	-	-	-	-	-	-
Perfluoropolyethylene Glycol Diol	-	-	-	-	5.8E-07	5.9E-08	-	-
Perfluoropolydioxolane Diol	-	-	-	-	0.01	0.05	-	-
Perfluoro (polyethylene glycol) diacid fluoride	-	-	-	-	0.01	0.04	-	-
Perfluoro (polytrimethylene glycol) diacid fluoride	-	-	-	-	1.0E-02	0.04	-	-
Perfluoro (polytetramethylene glycol) diacid fluoride	882695-72-9	-	-	-	0.01	0.05	-	-
Perfluoropolyoxolane Diacid fluoride	375-34-8	-	-	-	0.02	0.08	-	-
Tetrachloroethoxyfluorobutane	375-46-2	-	-	-	0.02	0.10	-	-
Penta-chloro-pentafluorobutane	375-49-5	-	-	-	0.03	0.14	-	-
Hexachloroethylfluorobutane	130085-19-7	2008 Email	200.00	20.00	0.02	0.06	-	-
Perfluoro (bis-2-chloroethoxy methane)	678-26-2	-	-	-	0.03	0.04	-	-
Perfluoropentane	355-42-0	TAMIS	10000.00	1000.00	0.02	0.04	-	-
Perfluorohexane	335-57-9	TAMIS	200.00	20.00	0.02	0.04	-	-
Perfluoroheptane	307-34-6	2008 Email	20000.00	2000.00	0.01	0.04	-	-
Perfluorooctane	375-96-2	-	-	-	0.01	0.04	-	-
Perfluorononane	376-03-4	-	-	-	9.3E-03	0.04	-	-
Perfluorodecane	2264-03-1	-	-	-	9.2E-03	0.04	-	-
Perfluorododecane	306-94-5	2008 Email	200.00	20.00	0.01	0.04	-	-
Perfluorodecalin	306-91-2	-	-	-	9.7E-03	0.04	-	-
Perfluorooctylphenanthrene	306-92-3	-	-	-	9.6E-03	0.04	-	-
Perfluorodimethylcyclohexane	306-98-9	-	-	-	0.01	0.04	-	-
Perfluoropentylfluorene	307-08-4	-	-	-	9.7E-03	0.04	-	-

PROPOSED EMISSIONS FOR FLORENCE SITE

Pollutant	CAS	ESL Source	Short-Term ESL (µg/m³)	Long-Term ESL (µg/m³)	EP3-1		EP3-2	
					(lbs/hr)	(tons/yr)	(lbs/hr)	(tons/yr)
Perfluorodisopropylcyclohexane	75169-51-6	-	-	-	9.2E-03	0.04	-	-
Perfluorooxy bromide	423-55-2	-	-	-	1.3E-03	6.3E-06	-	-
Methyl perfluoropentanoate	13039-26-1	-	-	-	0.01	0.05	0.38	0.05
Methyl perfluorohexanoate	424-18-0	-	-	-	0.01	0.05	0.23	0.03
Methyl perfluoroheptanoate	14312-99-1	-	-	-	0.01	0.05	0.14	0.02
Methyl perfluorooctanoate	376-27-2	-	-	-	0.01	0.05	0.10	0.01
Methyl perfluorononanoate	51502-45-5	-	-	-	0.01	0.05	0.05	6.1E-03
Methyl perfluorodecanoate	307-79-7	-	-	-	0.01	0.04	0.02	2.5E-03
Methyl perfluorododecanoate	56554-52-0	-	-	-	0.01	0.04	2.0E-03	2.5E-04
Methyl perfluorotetradecanoate	203302-99-2	-	-	-	1.0E-02	0.04	4.1E-04	4.9E-05
Methyl perfluorohexadecanoate	165457-57-8	-	-	-	9.9E-03	0.04	-	-
Dimethyl perfluorosuccinate	356-36-5	-	-	-	0.02	0.09	0.03	3.4E-03
Dimethyl perfluoglutarate	1513-62-8	-	-	-	0.02	0.07	8.6E-03	1.1E-03
Dimethyl perfluoro-3,6-dioxoactane-1,8-dioate	3107-98-0	-	-	-	0.01	0.06	6.1E-03	7.6E-04
Dimethyl perfluoro-3,6-dioxoactane-1,8-dioate	24647-20-9	-	-	-	0.02	0.07	7.1E-03	8.8E-04
Methyl perfluoro-3,6,9-trioxadecanoate	169289-58-1	-	-	-	0.01	0.05	0.05	5.9E-03
Dimethyl perfluorosubarate	2062-20-6	-	-	-	0.01	0.06	3.6E-03	4.5E-04
Dimethyl perfluoro-3,6,9-trioxadecanoate-1,11-dioate	35910-59-9	-	-	-	0.01	0.06	4.2E-03	5.1E-04
Methyl perfluoro-3,6-dioxadecanoate	129301-40-2	-	-	-	0.01	0.05	0.05	5.5E-03
Dimethyl perfluoroazetate	2216-90-1	-	-	-	0.01	0.05	2.1E-03	2.5E-04
Dimethyl perfluorosebacate	4590-24-3	-	-	-	0.01	0.05	2.0E-03	2.4E-04
Methyl perfluoroundecanoate	203302-98-1	-	-	-	0.01	0.04	8.9E-03	1.1E-03
Dimethyl perfluoro-1,12-decanedioate	84750-88-9	-	-	-	0.01	0.05	6.3E-03	7.5E-04
Perfluoropolyethylene	-	-	-	-	0.01	0.05	-	-
Methanol	67-56-1	TAMIS	3900.00	2100.00	0.03	4.7E-04	0.23	0.03
Methyl perfluoro-3,6-dioxahexanoate	39187-41-2	-	-	-	-	-	0.15	0.02
Methyl perfluoro-3,6,9-trioxadecanoate	330562-42-0	TAMIS	4920.00	492.00	4.3E-05	8.1E-07	0.01	1.8E-03
Isopropyl Alcohol	67-63-0	-	-	-	0.01	0.05	-	-
1H,1H-Perfluoro-1-pentanol	356-28-2	-	-	-	4.3E-05	8.1E-07	-	-
1H,1H-Perfluoro-1-hexanol	423-46-1	-	-	-	8.1E-05	2.6E-07	-	-
1H,1H-Perfluoro-1-heptanol	375-82-6	-	-	-	4.3E-05	1.3E-07	-	-
1H,1H-Perfluoro-1-octanol	307-30-2	-	-	-	3.0E-05	1.9E-07	-	-
1H,1H-Perfluoro-1-nonanol	423-56-3	-	-	-	1.2E-05	3.7E-08	-	-
1H,1H-Perfluoro-1-decanol	307-37-9	-	-	-	1.5E-06	3.9E-09	-	-
1H,1H-Perfluoro-1-dodecanol	307-46-0	-	-	-	8.6E-06	3.0E-08	-	-
1H,1H-Perfluoro-1-dodecanol	423-65-4	-	-	-	7.5E-16	9.3E-20	-	-
1H,1H-Perfluoro-1-tetradecanol	15622-57-8	-	-	-	3.4E-08	6.9E-11	-	-
Perfluoro-3,7-dimethyloctan-1-ol	232587-50-7	-	-	-	1.5E-06	3.8E-09	-	-
1H,1H,4H,4H-Perfluoro-1,4-butanediol	423-61-6	-	-	-	4.4E-08	3.1E-09	-	-
1H,1H,5H,5H-Perfluoro-1,5-pentanediol	376-90-9	-	-	-	1.1E-08	4.6E-11	-	-
1H,1H,6H,6H-Perfluoro-1,6-hexanediol	356-74-8	-	-	-	1.4E-07	8.3E-10	-	-
1H,1H,8H,8H-Perfluoro-1,8-octanediol	90177-96-1	-	-	-	8.5E-08	2.1E-10	-	-
1H,1H,9H,9H-Perfluoro-1,9-nonanediol	203303-01-9	-	-	-	1.9E-10	2.8E-13	-	-
1H,1H,10H,10H-Perfluoro-1,10-decanediol	754-96-1	-	-	-	3.8E-10	6.1E-13	-	-
1H,1H,12H,12H-Perfluoro-1,12-dodecanediol	183162-43-8	-	-	-	1.4E-10	2.2E-13	-	-
Perfluoro-tert-butanol	2378-02-1	2008 Email	1000.00	100.00	1.1E-03	3.9E-06	-	-
Fluorinated diethylene glycol monomethyl ether	330562-43-1	-	-	-	6.4E-05	1.9E-07	-	-
Fluorinated triethylene glycol monomethyl ether	147492-57-7	-	-	-	7.9E-05	2.5E-07	-	-
Fluorinated diethylene glycol monobutyl ether	152914-73-3	-	-	-	5.0E-05	2.6E-07	-	-
Fluorinated triethylene glycol monobutyl ether	317817-24-6	-	-	-	2.0E-05	9.8E-08	-	-
Fluorinated triethylene glycol	129301-42-4	-	-	-	7.5E-09	2.5E-11	-	-
Fluorinated tetraethylene glycol	330562-44-2	-	-	-	2.5E-09	7.7E-12	-	-
Perfluoropentanoic acid	2706-90-3	-	-	-	6.3E-06	3.1E-08	-	-
Perfluorohexanoic acid	307-24-4	-	-	-	6.3E-06	3.1E-08	-	-

Emissions

Exfluror Florence Plant Scaling Analysis and MERA

PROPOSED EMISSIONS FOR FLORENCE SITE

Pollutant	CAS	ESL Source	Short-Term ESL (µg/m ³)	Long-Term ESL (µg/m ³)	EP3-1		EP3-2	
					(lbs/yr)	(tons/yr)	(lbs/yr)	(tons/yr)
Perfluoroolefinic acid	375-85-9	*	0.05	0.01	3.8E-06	1.9E-08	-	-
Perfluorooctanoic acid	335-67-1	TAMIS	-	-	1.9E-06	1.1E-08	-	-
Perfluorononanoic acid	375-95-1	-	-	-	1.8E-06	9.1E-09	-	-
Perfluorodecanoic acid	335-76-2	2008 Email	14.00	1.40	4.5E-07	2.3E-09	-	-
Perfluoroundecanoic acid	2058-94-8	-	-	-	1.3E-07	6.4E-10	-	-
Perfluorododecanoic acid	307-55-1	-	-	-	1.1E-07	5.4E-10	-	-
Perfluorotetradecanoic acid	865-85-0	-	-	-	8.9E-10	4.4E-12	-	-
Perfluorohexadecanoic acid	376-06-7	-	-	-	1.5E-08	7.4E-11	-	-
Perfluorooctadecanoic acid	67905-19-5	-	-	-	1.1E-07	5.7E-10	-	-
Perfluorodecanoic acid	377-38-8	-	-	-	3.1E-08	1.5E-10	-	-
Perfluoroundecanoic acid	376-73-8	-	-	-	1.0E-08	5.1E-11	-	-
Perfluorododecanoic acid	151772-58-6	-	-	-	1.1E-08	5.5E-09	-	-
Perfluorotridecanoic acid	336-08-3	-	-	-	2.9E-10	1.4E-12	-	-
Perfluorotetradecanoic acid	55621-21-1	-	-	-	5.4E-09	2.7E-11	-	-
Perfluoro-3,6,9-trioxadecanoic acid	151772-59-7	-	-	-	9.7E-08	4.8E-08	-	-
Perfluoro-3,6,9-trioxadecanoic acid	678-45-5	-	-	-	2.5E-08	1.2E-10	-	-
Perfluorosuberic acid	137780-69-9	-	-	-	3.2E-07	1.6E-09	-	-
Perfluoro-3,6-dioxadecanoic acid	55621-18-6	-	-	-	3.4E-10	1.7E-12	-	-
Perfluoro-3,6,9-trioxadecanoic acid	23453-64-7	-	-	-	6.9E-09	3.5E-11	-	-
Perfluoro-3,7-dimethyladecanoic acid	172155-07-8	-	-	-	6.9E-07	3.4E-09	-	-
Perfluorosebacic acid	307-78-9	-	-	-	1.9E-09	9.7E-12	-	-
Bromine	7726-95-6	TAMIS	7.00	0.70	1.5E-05	7.8E-07	-	-
Perfluorohexyl bromide	335-56-8	-	-	-	1.0E-06	7.7E-10	-	-
Perfluorohexyl bromide	375-88-2	-	-	-	9.5E-07	7.1E-10	-	-
Perfluorononyl bromide	558-96-3	-	-	-	6.8E-07	5.1E-10	-	-
Perfluorodecyl bromide	307-43-7	-	-	-	7.9E-08	6.0E-11	-	-
Perfluoro-1,4-dibromobutane	335-48-8	-	-	-	2.3E-06	6.9E-09	-	-
Perfluoro-1,6-dibromohexane	918-22-9	-	-	-	1.0E-06	7.5E-10	-	-
Perfluoro-1,8-dibromooctane	812-58-8	-	-	-	2.5E-07	1.9E-10	-	-
Perfluoro-2,5,8-trioxanonyl bromide	330562-45-3	-	-	-	2.7E-07	2.0E-10	-	-
Perfluoro-2,5-dioxanonyl bromide	330562-46-4	-	-	-	3.1E-07	2.4E-10	-	-
Perfluoro-2,5,8-trioxadodecyl bromide	330562-47-5	-	-	-	3.5E-07	2.6E-10	-	-
Perfluoro-1,6-dibromo-2,5-dioxahexane	330562-48-6	-	-	-	5.2E-07	3.9E-10	-	-
Perfluoro-1,9-dibromo-2,5,8-trioxanonane	330562-49-7	-	-	-	7.7E-07	5.8E-10	-	-
polymers of chlorotrifluoroethylene (PCTFE)	9002-93-9	2008 Email	1000.00	100.00	3.3E-04	5.2E-04	0.12	7.8E-03
Toluene	108-88-3	TAMIS	4500.00	1200.00	1.8E-05	2.4E-07	-	-
Butylated Hydroxytoluene	128-37-0	TAMIS	Must Meet NAAQS	Must Meet NAAQS	7.1E-09	8.9E-11	-	-
PDO Diol	-	-	-	-	2.5E-11	4.8E-13	-	-
Perfluorosuccinic anhydride	699-30-9	-	-	-	5.9E-06	1.4E-07	-	-
Perfluoroglutaric anhydride	375-68-1	-	-	-	3.6E-06	8.7E-08	-	-
Acrylic Acid	79-10-7	TAMIS	60.00	6.00	4.8E-08	3.4E-08	-	-
1H,1H-Perfluoro-n-octyl acrylate	307-98-2	-	-	-	3.7E-08	4.4E-09	-	-
1H,1H-Perfluoro-n-decyl acrylate	335-83-1	-	-	-	1.6E-09	2.0E-10	-	-
1H,1H-Perfluoro-n-octyl methacrylate	3934-23-4	-	-	-	3.4E-09	4.1E-10	-	-
1H,1H-Perfluoro-n-decyl methacrylate	23069-32-1	-	-	-	2.9E-09	3.0E-10	-	-
1H,1H,6H,6H-Perfluoro-1,6-hexanediol diacrylate	2264-01-9	-	-	-	1.3E-11	1.5E-12	-	-
Perfluoro-15H-crown-5 ether	97571-89-2	-	-	-	6.5E-07	7.7E-08	-	-
Fluorinated PMG 250 Diol	146191-87-9	-	-	-	4.4E-07	8.9E-09	-	-
Hydrogen Chloride	7647-01-0	TAMIS	190.00	7.90	0.02	0.09	-	-
Fluorinated Poly (Trimethylene Glycol)	143-24-8	-	-	-	5.8E-07	1.2E-08	-	-
Tetraethylene glycol dimethyl ether	1423231-12-2	-	-	-	3.4E-09	2.2E-10	-	-
Perfluoro(Diethylene Glycol Monoisobutyl Ether)	-	-	-	-	2.5E-05	5.5E-07	-	-
Perfluorocyclohexyl methanol	28788-68-3	-	-	-	8.2E-06	1.4E-07	-	-

Emissions

Exfluror Florence Plant Sealing Analysis and MERA

PROPOSED EMISSIONS FOR FLORENCE SITE

Pollutant	CAS	ESL Source	Short-Term ESL (µg/m ³)	Long-Term ESL (µg/m ³)	EP3-1		EP3-2	
					(lbs/hr)	(tons/yr)	(lbs/hr)	(tons/yr)
Pentfluoropolyethylene Glycol 400, -CH ₂ OH terminated	146222-64-0	-	-	-	5.8E-07	1.2E-08	-	-
Ethyl acetate	141-79-6	TAMIS	3100.00	1440.00	5.8E-04	1.0E-04	-	-
Perfluoro-1-butylcyclohexane	84808-64-0	2008 Email	200.00	20.00	-	-	-	-
1,1,2-Trichloro-1,2,2-trifluoroethane	76-13-1	TAMIS	38000.00	3800.00	-	-	-	-
Perfluorobutyl Vinyl Fluoride	335-42-2	-	-	-	-	-	-	-
Perfluoropropane	76-19-7	TAMIS	10000.00	1000.00	-	-	-	-
Carbon tetrafluoride	75-73-0	TAMIS	18000.00	1800.00	0.99	4.35	-	-
Tetrahydrofuran	109-99-9	TAMIS	1500.00	150.00	1.8E-03	6.9E-03	-	-
Acid Fluorides	-	-	-	-	-	-	-	-
Hydrogen Bromide	10035-10-6	TAMIS	100.00	10.00	2.0E-04	1.3E-05	-	-
Oxides of Nitrogen	10102-43-9	TAMIS	Must Meet NAAQS	Must Meet NAAQS	0.03	0.13	-	-
Carbon Monoxide	630-08-0	TAMIS	Must Meet NAAQS	Must Meet NAAQS	0.04	0.18	-	-
Particulate Matter (PM ₁₀ , PM _{2.5})	-	-	Must Meet NAAQS	Must Meet NAAQS	3.8E-03	0.02	-	-

PROPOSED EMISSIONS FOR FLORENCE SITE

Pollutant	CAS	ESL Source	Short-Term ESL (ug/m3)	Long-Term ESL (ug/m3)	EP3-3		FUG3-1	
					(lb/hr)	(tones/yr)	(lb/hr)	(tones/yr)
Hydrogen Fluoride	7664-39-3	TAMIS	18.00	8.70	-	-	0.13	0.55
Hydrogen Fluoride (Agriculture)	7664-39-3	TAMIS	3.00	0.60	-	-	0.13	0.55
Hydrogen Fluoride (Agriculture with Cattle)	7664-39-3	TAMIS	n/a	0.75	-	-	0.13	0.55
Difluorine	7782-41-4	TAMIS	2.00	0.20	-	-	0.10	0.45
Carbonyl Fluoride	353-50-4	TAMIS	17.00	8.10	-	-	-	-
Carbonyl Fluoride (Agriculture)	353-50-4	TAMIS	2.80	0.57	-	-	-	-
Carbonyl Fluoride (Agriculture with Cattle)	353-50-4	TAMIS	n/a	0.71	-	-	-	-
Acetyl Fluorides	354-34-7	2008 Email	200.00	20.00	-	-	1.1E-03	4.8E-03
Trifluoroacetic acid	76-05-1	TAMIS	17.00	8.10	-	-	-	-
Trifluoroacetic acid (Agriculture)	76-05-1	TAMIS	2.80	0.57	-	-	-	-
Trifluoroacetic acid (Agriculture with Cattle)	76-05-1	TAMIS	n/a	0.71	-	-	-	-
Perfluoropentanoyl fluoride	375-62-2	-	-	-	-	-	0.01	0.05
Perfluorohexanoyl fluoride	355-38-4	-	-	-	-	-	4.7E-03	0.02
Perfluoroheptanoyl fluoride	375-84-8	-	-	-	-	-	8.7E-03	0.04
Perfluorooctanoyl fluoride	335-66-0	-	-	-	-	-	7.4E-03	0.03
Perfluorononoyl fluoride	538-95-2	-	-	-	-	-	0.01	0.04
Perfluorodecyl fluoride	594-98-9	2008 Email	200.00	20.00	-	-	6.0E-03	0.03
Perfluoroundecyl fluoride	679-13-0	-	-	-	-	-	4.7E-03	0.02
Hexafluoroglutaryl fluoride	678-78-4	-	-	-	-	-	7.4E-03	0.03
Octafluoroadipoyl fluoride	37881-62-2	-	-	-	-	-	0.02	0.07
Perfluoroundecyl fluoride	24647-09-4	-	-	-	-	-	3.3E-03	0.01
Perfluorosebacoyl fluoride	-	-	-	-	-	-	-	-
Perfluorobutoxyethoxyacetyl fluoride	172897-76-5	-	-	-	-	-	5.3E-03	0.02
Perfluorotriglycyl fluoride	24647-19-6	-	-	-	-	-	2.0E-03	8.6E-03
Perfluoro-3,6,9-Trioxatridecanoyl fluoride	883733-06-0	-	-	-	-	-	6.9E-03	0.03
Perfluorotetraglycyl fluoride	24689-56-3	-	-	-	-	-	2.0E-03	8.6E-03
Perfluoro-3,6,9-hioxatridecanoic acid	330562-41-9	-	-	-	-	-	-	-
Perfluoropolyethylene Glycol Glycyl fluoride	-	-	-	-	-	-	6.3E-03	0.03
Perfluoropolyethylene acyl fluoride	-	-	-	-	-	-	-	-
Perfluoropolytetramethylene acyl fluoride	-	-	-	-	-	-	-	-
Perfluoropolydioxolane diacyl fluoride	-	-	-	-	-	-	-	-
Perfluorocyclohexyl carbonyl fluoride	6588-63-2	-	-	-	-	-	4.7E-03	0.02
Perfluoropolyethylene Glycol Diol	-	-	-	-	-	-	-	-
Perfluoropolydioxolane Diol	-	-	-	-	-	-	-	-
Perfluoro (polyethylene glycol) diacid fluoride	-	-	-	-	-	-	2.0E-03	8.6E-03
Perfluoro (polyimethylene glycol) diacid fluoride	-	-	-	-	-	-	2.0E-03	8.6E-03
Perfluoro (polytetramethylene glycol) diacid fluoride	882695-72-9	-	-	-	-	-	1.9E-03	8.2E-03
Perfluoropolydioxolane Diacid fluoride	375-34-8	-	-	-	-	-	9.9E-03	0.04
Tetrachloropentafluorobutane	375-46-2	-	-	-	-	-	0.30	1.32
Pentafluorohexafluorobutane	375-49-5	-	-	-	-	-	0.15	0.67
Hexachloroheptafluorobutane	130055-19-7	2008 Email	200.00	20.00	-	-	0.06	0.27
Perfluoro (bis-2-chloroethoxy methane)	678-26-2	-	-	-	-	-	0.11	0.50
Perfluoropentane	355-42-0	TAMIS	10000.00	1000.00	-	-	0.20	0.88
Perfluorohexane	335-57-9	TAMIS	200.00	20.00	-	-	0.51	2.24
Perfluoroheptane	307-34-6	2008 Email	20000.00	2000.00	-	-	0.38	1.67
Perfluorooctane	375-96-2	-	-	-	-	-	0.11	0.48
Perfluorononane	376-03-4	-	-	-	-	-	0.07	0.29
Perfluorodecane	2264-03-1	-	-	-	-	-	0.07	0.29
Perfluoropentadecane	305-94-5	2008 Email	200.00	20.00	-	-	0.54	2.35
Perfluorooctadecalin	306-91-2	-	-	-	-	-	0.09	0.37
Perfluorooctylhydroperfluorobutane	306-92-3	-	-	-	-	-	0.07	0.29
Perfluorodimethylcyclohexane	306-98-9	-	-	-	-	-	0.11	0.48
Perfluorooxyhydrofluorane	307-09-4	-	-	-	-	-	0.07	0.29

PROPOSED EMISSIONS FOR FLORENCE SITE

Pollutant	CAS	ESL Source	Short-Term ESL (µg/m3)	Long-Term ESL (µg/m3)	EP3-3		FUG3-1	
					(lb/yr)	(tons/yr)	(lbs/yr)	(tons/yr)
Perfluorodisopropylcyclohexane	75169-51-6	-	-	-	-	-	-	-
Perfluorocetyl bromide	423-55-2	-	-	-	0.50	0.06	0.07	0.29
Methyl perfluoropentanoate	13039-26-1	-	-	-	0.30	0.04	-	-
Methyl perfluorohexanoate	424-18-0	-	-	-	0.18	0.02	-	-
Methyl perfluoroheptanoate	14312-89-1	-	-	-	0.13	0.02	-	-
Methyl perfluorooctanoate	376-27-2	-	-	-	0.06	8.2E-03	-	-
Methyl perfluorononanoate	51502-45-5	-	-	-	0.03	3.3E-03	-	-
Methyl perfluorodecanoate	307-79-7	-	-	-	2.6E-03	3.3E-04	-	-
Methyl perfluorododecanoate	56554-52-0	-	-	-	5.2E-04	6.6E-05	-	-
Methyl perfluorotetradecanoate	203302-99-2	-	-	-	-	-	-	-
Methyl perfluorohexadecanoate	165457-57-8	-	-	-	0.04	4.7E-03	1.4E-03	5.9E-03
Dimethyl perfluorosuccinate	356-36-5	-	-	-	0.01	1.5E-03	-	-
Dimethyl perfluoroglutarate	1513-62-8	-	-	-	7.9E-03	1.0E-03	-	-
Dimethyl perfluorodipate	3107-98-0	-	-	-	9.2E-03	1.2E-03	-	-
Dimethyl perfluoro-3,6-dioxadecane-1,8-dioate	24647-20-9	-	-	-	0.06	8.0E-03	-	-
Methyl perfluoro-3,6,9-trioxadecanoate	169289-58-1	-	-	-	4.7E-03	6.1E-04	-	-
Dimethyl perfluorosuberate	2062-20-6	-	-	-	5.4E-03	7.0E-04	-	-
Dimethyl perfluoro-3,6,9-trioxadecane-1,11-dioate	35910-59-9	-	-	-	0.06	7.5E-03	-	-
Methyl perfluoro-3,6-dioxadecanoate	129301-40-2	-	-	-	2.7E-03	3.4E-04	-	-
Dimethyl perfluoroazalate	2216-50-1	-	-	-	2.6E-03	3.3E-04	-	-
Dimethyl perfluorosebacate	44590-24-3	-	-	-	0.01	1.4E-03	-	-
Methyl perfluoroundecanoate	203302-98-1	-	-	-	8.0E-03	1.0E-03	-	-
Dimethyl perfluoro-1,12-decanedioate	84750-88-9	-	-	-	-	-	-	-
Perfluoropolyether	-	-	-	-	-	-	-	-
Methanol	67-56-1	TAMIS	3900.00	2100.00	0.32	0.04	0.05	0.20
Methyl perfluoro-3,6-dioxahexanoate	39187-41-2	-	-	-	0.19	0.03	-	-
Methyl perfluoro-3,6,9-trioxadecanoate	330562-42-0	TAMIS	4920.00	492.00	0.02	2.4E-03	-	-
Isopropyl Alcohol	67-63-0	-	-	-	-	-	-	-
1H, 1H-Perfluoro-1-pentanol	355-28-2	-	-	-	-	-	-	-
1H, 1H-Perfluoro-1-hexanol	423-46-1	-	-	-	-	-	-	-
1H, 1H-Perfluoro-1-heptanol	375-82-6	-	-	-	-	-	-	-
1H, 1H-Perfluoro-1-octanol	307-30-2	-	-	-	-	-	-	-
1H, 1H-Perfluoro-1-nonanol	423-56-3	-	-	-	-	-	-	-
1H, 1H-Perfluoro-1-decanol	307-37-9	-	-	-	-	-	-	-
1H, 1H-Perfluoro-1-undecanol	307-46-0	-	-	-	-	-	-	-
1H, 1H-Perfluoro-1-dodecanol	423-65-4	-	-	-	-	-	-	-
1H, 1H-Perfluoro-1-tetradecanol	15622-57-8	-	-	-	-	-	-	-
Perfluoro-3,7-dimethyloctan-1-ol	232587-50-7	-	-	-	-	-	-	-
1H, 1H,4H,4H-Perfluoro-1,4-butanediol	425-61-6	-	-	-	-	-	-	-
1H, 1H,5H,5H-Perfluoro-1,5-pentanediol	376-90-9	-	-	-	-	-	-	-
1H, 1H,6H,6H-Perfluoro-1,6-hexanediol	355-74-8	-	-	-	-	-	-	-
1H, 1H,8H,8H-Perfluoro-1,8-octanediol	90177-98-1	-	-	-	-	-	-	-
1H, 1H,9H,9H-Perfluoro-1,9-nonanediol	203303-01-9	-	-	-	-	-	-	-
1H, 1H,10H,10H-Perfluoro-1,10-decanediol	754-96-1	-	-	-	-	-	-	-
1H, 1H,12H,12H-Perfluoro-1,12-dodecanediol	183162-43-8	-	-	-	-	-	-	-
Perfluoro-tert-butanol	2378-02-1	2008 Email	1000.00	100.00	-	-	-	-
Fluorinated diethylene glycol monomethyl ether	330562-43-1	-	-	-	-	-	-	-
Fluorinated triethylene glycol monomethyl ether	147492-57-7	-	-	-	-	-	-	-
Fluorinated diethylene glycol monobutyl ether	152914-73-3	-	-	-	-	-	-	-
Fluorinated triethylene glycol monobutyl ether	317817-24-6	-	-	-	-	-	-	-
Fluorinated triethylene glycol	129301-42-4	-	-	-	-	-	-	-
Fluorinated tetraethylene glycol	330562-44-2	-	-	-	-	-	-	-
Perfluoropentanoic acid	2706-90-3	-	-	-	-	-	-	-
Perfluorohexanoic acid	307-24-4	-	-	-	-	-	-	-

Emissions

Exfluror Florence Plant Scaling Analysis and MERA

PROPOSED EMISSIONS FOR FLORENCE SITE

Pollutant	CAS	ESL Source	Short-Term ESL (µg/m ³)	Long-Term ESL (µg/m ³)	EP3-3		FUG3-1	
					(lbs/hr)	(tons/yr)	(lbs/hr)	(tons/yr)
Perfluorobiphenyl acid	375-85-9	-	-	-	-	-	-	-
Perfluorooctanoic acid	335-67-1	TAMIS	0.05	0.01	-	-	-	-
Perfluorononanoic acid	375-95-1	-	-	-	-	-	-	-
Perfluorodecanoic acid	335-76-2	2008 Email	14.00	1.40	-	-	-	-
Perfluoroundecanoic acid	2058-94-8	-	-	-	-	-	-	-
Perfluorododecanoic acid	307-55-1	-	-	-	-	-	-	-
Perfluorotetradecanoic acid	865-85-0	-	-	-	-	-	-	-
Perfluorohexadecanoic acid	376-06-7	-	-	-	-	-	-	-
Perfluorooctadecanoic acid	67905-19-5	-	-	-	-	-	-	-
Perfluorostyrene	377-39-8	-	-	-	-	-	-	-
Perfluoroglycidic acid	376-73-8	-	-	-	-	-	-	-
Perfluoro-3,6-dioxahexanoic acid	151772-58-6	-	-	-	-	-	-	-
Perfluoro-3,6-dioxahexanoic acid	336-08-3	-	-	-	-	-	-	-
Perfluoro-3,6-dioxadecane-1,11-dioic acid	55621-21-1	-	-	-	-	-	-	-
Perfluoro-3,6,9-trioxadecanoic acid	151772-59-7	-	-	-	-	-	-	-
Perfluorosuberic acid	678-45-5	-	-	-	-	-	-	-
Perfluoro-3,5-dioxadecanoic acid	137780-69-9	-	-	-	-	-	-	-
Perfluoro-3,5,9-trioxadecane-1,11-dioic acid	55621-18-6	-	-	-	-	-	-	-
Perfluorazelaic acid	23453-64-7	-	-	-	-	-	-	-
Perfluoro-3,7-dimethylcyclohexanoic acid	172155-07-8	-	-	-	-	-	-	-
Perfluorosebacic acid	307-78-8	TAMIS	7.00	0.70	-	-	0.14	0.80
Bromine	7726-95-6	-	-	-	-	-	-	-
Perfluorohexyl bromide	335-56-8	-	-	-	-	-	-	-
Perfluorohexyl bromide	375-88-2	-	-	-	-	-	-	-
Perfluorooctyl bromide	558-96-3	-	-	-	-	-	-	-
Perfluorodecyl bromide	307-43-7	-	-	-	-	-	-	-
Perfluoro-1,4-dibromobutane	335-48-8	-	-	-	-	-	-	-
Perfluoro-1,6-dibromohexane	918-22-9	-	-	-	-	-	-	-
Perfluoro-1,8-dibromooctane	812-58-8	-	-	-	-	-	-	-
Perfluoro-2,5,8-trioxanonyl bromide	330562-45-3	-	-	-	-	-	-	-
Perfluoro-2,5-dioxanonyl bromide	330562-46-4	-	-	-	-	-	-	-
Perfluoro-2,5,8-trioxadodecyl bromide	330562-47-5	-	-	-	-	-	-	-
Perfluoro-1,6-dibromo-2,5-dioxahexane	330562-48-5	-	-	-	-	-	-	-
Perfluoro-1,9-dibromo-2,5,8-trioxononane	330562-49-7	-	-	-	-	-	-	-
polymers of chlorotrifluoroethylene (PCTFE)	9002-83-9	2008 Email	1000.00	100.00	0.17	0.01	0.03	0.12
Toluene	108-88-3	TAMIS	4500.00	1200.00	-	-	-	-
Butylated Hydroxytoluene	128-37-0	TAMIS	Must Meet NAAQS	Must Meet NAAQS	-	-	-	-
PDO Diol	-	-	-	-	-	-	-	-
Perfluorosuccinic anhydride	699-30-9	-	-	-	-	-	-	-
Perfluoroglutaric anhydride	376-68-1	-	-	-	-	-	-	-
Acrylic Acid	79-10-7	TAMIS	60.00	6.00	-	-	-	-
1H,1H-Perfluoro-n-octyl acrylate	307-98-2	-	-	-	-	-	-	-
1H,1H-Perfluoro-n-decyl acrylate	335-83-1	-	-	-	-	-	-	-
1H,1H-Perfluoro-n-octyl methacrylate	3934-23-4	-	-	-	-	-	-	-
1H,1H-Perfluoro-n-decyl methacrylate	23069-32-1	-	-	-	-	-	-	-
1H,1H,6H,6H-Perfluoro-1,6-hexanediol diacrylate	2264-01-9	-	-	-	-	-	-	-
Perfluoro-1,5,9-trioxon-5 ether	9757-169-2	-	-	-	-	-	-	-
Fluorinated PMG 250 Diol	146191-87-9	-	-	-	-	-	-	-
Hydrogen Chloride	7647-01-0	TAMIS	190.00	7.90	-	-	0.04	0.19
Fluorinated Poly (Trimethylene Glycol)	-	-	-	-	-	-	-	-
Tetraethylene glycol dimethyl ether	143-24-8	-	-	-	-	-	-	-
Perfluoro(Diethylene Glycol Monoisobutyl Ether)	142323-112-2	-	-	-	-	-	-	-
Perfluorocyclohexyl methanol	28788-68-3	-	-	-	-	-	-	-

Emissions

Exfluror Florence Plant Sealing Analysis and MERA

PROPOSED EMISSIONS FOR FLORENCE SITE

Pollutant	CAS	ESL Source	Short-Term ESL (µg/m ³)	Long-Term ESL (µg/m ³)	EP3-3		FUG3-1	
					(lbs/hr)	(ton/yr)	(lbs/hr)	(ton/yr)
Perfluoro(Polyethylene Glycol 400)-CH ₂ OH terminated	146222-54-0	-	-	-	-	-	-	-
Ethyl acetate	141-78-6	TAMIS	3100.00	1440.00	-	-	-	-
Perfluoro-t-butylcyclohexane	84808-64-0	2008 Email	200.00	20.00	-	-	2.9E-03	0.01
1,1,2-Trichloro-1,2,2-tetrafluoroethane	76-13-1	TAMIS	38000.00	3800.00	-	-	0.05	0.20
Perfluorobutylvinyl Fluoride	336-42-2	-	-	-	-	-	2.7E-03	0.01
Perfluoropropane	76-19-7	TAMIS	10000.00	1000.00	-	-	0.05	0.20
Carbon tetrafluoride	75-73-0	TAMIS	18000.00	1800.00	-	-	-	-
Tetrahydrofuran	109-99-9	TAMIS	1500.00	150.00	-	-	-	-
Acid Fluorides	-	-	-	-	-	-	0.06	0.24
Hydrogen Bromide	10035-10-6	TAMIS	100.00	10.00	-	-	-	-
Oxides of Nitrogen	10102-43-9	TAMIS	Must Meet NAAQS	Must Meet NAAQS	-	-	-	-
Carbon Monoxide	630-08-0	TAMIS	Must Meet NAAQS	Must Meet NAAQS	-	-	-	-
Particulate Matter (PM ₁₀ , PM _{2.5})	-	-	Must Meet NAAQS	Must Meet NAAQS	-	-	-	-

PROPOSED EMISSIONS FOR FLORENCE SITE

Pollutant	CAS	ESL Source	Short-Term ESL (µg/m ³)	Long-Term ESL (µg/m ³)	FUG3-2		FUG3-3	
					(lbs/hr)	(tons/yr)	(lbs/hr)	(tons/yr)
Hydrogen Fluoride (Agriculture)	7664-39-3	TAMIS	18.00	8.70	-	-	-	-
Hydrogen Fluoride (Agriculture with Cattle)	7664-39-3	TAMIS	3.00	0.60	-	-	-	-
Difluorine	7782-41-4	TAMIS	n/a	0.75	-	-	-	-
Carbonyl Fluoride (Agriculture)	353-50-4	TAMIS	17.00	2.00	-	-	-	-
Carbonyl Fluoride (Agriculture with Cattle)	353-50-4	TAMIS	2.80	0.57	-	-	-	-
Acetyl Fluorides	354-34-7	2008 Email	n/a	0.71	-	-	-	-
Trifluoroacetic acid	76-05-1	TAMIS	200.00	20.00	-	-	-	-
Trifluoroacetic acid (Agriculture)	76-05-1	TAMIS	17.00	8.10	-	-	-	-
Trifluoroacetic acid (Agriculture with Cattle)	76-05-1	TAMIS	2.80	0.57	-	-	-	-
Perfluorooctanoic acid	375-62-2	TAMIS	n/a	0.71	-	-	-	-
Perfluorohexanoic acid	355-38-4	-	-	-	-	-	-	-
Perfluorooctanoic acid	375-84-8	-	-	-	-	-	-	-
Perfluorooctanoic acid	335-66-0	-	-	-	-	-	-	-
Perfluorooctanoic acid	558-95-2	-	-	-	-	-	-	-
Perfluorodecanoic acid	594-98-9	2008 Email	200.00	20.00	-	-	-	-
Perfluorododecanoic acid	679-13-0	-	-	-	-	-	-	-
Hexafluoroisobutylene fluoride	678-78-4	-	-	-	-	-	-	-
Octafluoroadipoyl fluoride	37881-82-2	-	-	-	-	-	-	-
Perfluorooctanoic acid	24647-09-4	-	-	-	-	-	-	-
Perfluorooctanoic acid	112897-76-5	-	-	-	-	-	-	-
Perfluorooctanoic acid	24647-19-6	-	-	-	-	-	-	-
Perfluorooctanoic acid	883733-06-0	-	-	-	-	-	-	-
Perfluorooctanoic acid	24689-56-3	-	-	-	-	-	-	-
Perfluoro-3,6,9-trioxatridecanoic acid	330562-41-9	-	-	-	-	-	-	-
Perfluoropolyethylene Glycol Glycoyl fluoride	-	-	-	-	-	-	-	-
Perfluoropolyethylene acyl fluoride	-	-	-	-	-	-	-	-
Perfluoropolyethylene diacyl fluoride	-	-	-	-	-	-	-	-
Perfluoropolyethylene carbonyl fluoride	-	-	-	-	-	-	-	-
Perfluoropolyethylene Glycol Diol	6588-63-2	-	-	-	-	-	-	-
Perfluoropolyethylene Glycol Diol	-	-	-	-	-	-	-	-
Perfluoro (polyethylene glycol) diacid fluoride	-	-	-	-	-	-	-	-
Perfluoro (polytetramethylene glycol) diacid fluoride	-	-	-	-	-	-	-	-
Perfluoro (polytetramethylene glycol) diacid fluoride	-	-	-	-	-	-	-	-
Perfluoro (polytetramethylene glycol) diacid fluoride	882695-72-9	-	-	-	-	-	-	-
Tetrachlorohexafluorobutane	375-34-8	-	-	-	-	-	-	-
Pentachloropentafluorobutane	375-46-2	-	-	-	-	-	-	-
Hexachloroheptafluorobutane	375-49-5	-	-	-	-	-	-	-
Perfluoro (bis-2-chloroethoxy methane)	130085-19-7	2008 Email	200.00	20.00	-	-	-	-
Perfluoropentane	678-26-2	-	-	-	-	-	-	-
Perfluorohexane	355-42-0	TAMIS	10000.00	1000.00	-	-	-	-
Perfluoroheptane	335-57-9	TAMIS	200.00	20.00	-	-	-	-
Perfluorooctane	307-34-6	2008 Email	20000.00	2000.00	-	-	-	-
Perfluorononane	375-96-2	-	-	-	-	-	-	-
Perfluorodecane	376-03-4	-	-	-	-	-	-	-
Perfluorododecane	2264-03-1	-	-	-	-	-	-	-
Perfluorotetradecane	306-94-5	2008 Email	200.00	20.00	-	-	-	-
Perfluorooctadecane	306-91-2	-	-	-	-	-	-	-
Perfluoromethyldecalin	306-92-3	-	-	-	-	-	-	-
Perfluoromethylcyclohexane	306-98-9	-	-	-	-	-	-	-
Perfluoropenthydrofluorene	307-08-4	-	-	-	-	-	-	-

PROPOSED EMISSIONS FOR FLORENCE SITE

Pollutant	CAS	ESL Source	Short-Term ESL (µg/m3)	Long-Term ESL (µg/m3)	FUG3-2		FUG3-3	
					(lbs/hr)	(tons/yr)	(lbs/hr)	(tons/yr)
Perfluorodisopropylcyclohexane	75169-51-6	-	-	-	-	-	-	
Perfluorooxyl bromide	423-55-2	-	-	-	-	-	-	
Methyl perfluoropentanoate	13038-26-1	-	-	-	-	-	-	
Methyl perfluorohexanoate	424-18-0	-	-	-	-	-	-	
Methyl perfluoroheptanoate	14312-89-1	-	-	-	-	-	-	
Methyl perfluorooctanoate	376-27-2	-	-	-	-	-	-	
Methyl perfluorononanoate	51502-45-5	-	-	-	-	-	-	
Methyl perfluorodecanoate	307-79-7	-	-	-	-	-	-	
Methyl perfluorododecanoate	56554-52-0	-	-	-	-	-	-	
Methyl perfluorotetradecanoate	203302-99-2	-	-	-	-	-	-	
Methyl perfluorohexadecanoate	165457-57-8	-	-	-	-	-	-	
Dimethyl perfluorosuccinate	356-36-5	-	-	-	6.9E-03	0.03	-	
Dimethyl perfluoroglutarate	1513-62-8	-	-	-	-	-	-	
Dimethyl perfluorodipate	3107-99-0	-	-	-	-	-	-	
Dimethyl perfluoro-3,6-dioxadecane-1,8-dioate	24647-20-8	-	-	-	-	-	-	
Methyl perfluoro-3,6,9-trioxadecanoate	169289-58-1	-	-	-	-	-	-	
Dimethyl perfluorosuberate	2062-20-6	-	-	-	-	-	-	
Dimethyl perfluoro-3,6,9-trioxadecane-1,11-dioate	35910-59-9	-	-	-	-	-	-	
Methyl perfluoro-3,6-dioxadecanoate	129301-40-2	-	-	-	-	-	-	
Dimethyl perfluoroazalate	2216-90-1	-	-	-	-	-	-	
Dimethyl perfluorosebacate	4590-24-3	-	-	-	-	-	-	
Methyl perfluoroundecanoate	203302-98-1	-	-	-	-	-	-	
Dimethyl perfluoro-1,12-decanedicarlate	84750-88-9	-	-	-	-	-	-	
Perfluoropolyethylene	-	-	-	-	-	-	-	
Methanol	67-56-1	TAMIS	3900.00	2100.00	-	-	-	
Methyl perfluoro-3,6-dioxahexanoate	39187-41-2	-	-	-	-	-	-	
Methyl perfluoro-3,6,9-trioxadecanoate	330562-42-0	TAMIS	4820.00	482.00	-	-	-	
Isopropyl Alcohol	67-63-0	-	-	-	-	-	-	
1H,1H-Perfluoro-1-pentanol	356-28-2	-	-	-	-	-	-	
1H,1H-Perfluoro-1-hexanol	423-46-1	-	-	-	-	-	-	
1H,1H-Perfluoro-1-heptanol	375-82-6	-	-	-	-	-	-	
1H,1H-Perfluoro-1-octanol	307-30-2	-	-	-	-	-	-	
1H,1H-Perfluoro-1-nonanol	423-56-3	-	-	-	-	-	-	
1H,1H-Perfluoro-1-decanol	307-37-9	-	-	-	-	-	-	
1H,1H-Perfluoro-1-undecanol	307-46-0	-	-	-	-	-	-	
1H,1H-Perfluoro-1-dodecanol	423-65-4	-	-	-	-	-	-	
1H,1H-Perfluoro-1-tetradecanol	15622-57-8	-	-	-	-	-	-	
Perfluoro-3,7-dimethyloctan-1-ol	232587-50-7	-	-	-	-	-	-	
1H,1H,4H-Perfluoro-1,4-butanediol	425-61-6	-	-	-	-	-	-	
1H,1H,5H,5H-Perfluoro-1,5-pentaneidiol	376-90-9	-	-	-	-	-	-	
1H,1H,6H,6H-Perfluoro-1,6-hexanediol	356-74-8	-	-	-	-	-	-	
1H,1H,8H,8H-Perfluoro-1,8-octanediol	90177-96-1	-	-	-	-	-	-	
1H,1H,9H,9H-Perfluoro-1,9-nonanediol	203303-01-9	-	-	-	-	-	-	
1H,1H,10H,10H-Perfluoro-1,10-decanediol	754-98-1	-	-	-	-	-	-	
1H,1H,12H,12H-Perfluoro-1,12-dodecanediol	183162-43-8	-	-	-	-	-	-	
Perfluoro-tert-butanol	2378-02-1	2008 Email	1000.00	100.00	-	-	-	
Fluorinated diethylene glycol monomethyl ether	330562-43-1	-	-	-	-	-	-	
Fluorinated triethylene glycol monomethyl ether	147492-57-7	-	-	-	-	-	-	
Fluorinated diethylene glycol monobutyl ether	152914-73-3	-	-	-	-	-	-	
Fluorinated triethylene glycol monobutyl ether	317817-24-6	-	-	-	-	-	-	
Fluorinated triethylene glycol	129301-42-4	-	-	-	-	-	-	
Fluorinated tetraethylene glycol	330562-44-2	-	-	-	-	-	-	
Perfluoropentanoic acid	2706-90-3	-	-	-	-	-	-	
Perfluorohexanoic acid	307-24-4	-	-	-	-	-	-	

PROPOSED EMISSIONS FOR FLORENCE SITE

Pollutant	CAS	ESL Source	Short-Term ESL (µg/m³)	Long-Term ESL (µg/m³)	FUG3-2		FUG3-3	
					(lbs/hr)	(tons/yr)	(lbs/hr)	(tons/yr)
Perfluorooctanoic acid	375-85-9	-	-	-	-	-	-	
Perfluorooctanoic acid	335-67-1	TAMIS	0.05	0.01	-	-	-	
Perfluorononanoic acid	375-95-1	-	-	-	-	-	-	
Perfluorodecanoic acid	335-76-2	2008 Email	14.00	1.40	-	-	-	
Perfluoroundecanoic acid	2058-94-8	-	-	-	-	-	-	
Perfluorododecanoic acid	307-55-1	-	-	-	-	-	-	
Perfluorotridecanoic acid	865-85-0	-	-	-	-	-	-	
Perfluorotetradecanoic acid	376-06-7	-	-	-	-	-	-	
Perfluorohexadecanoic acid	67905-19-5	-	-	-	-	-	-	
Perfluorooctanoic acid	377-38-8	-	-	-	-	-	-	
Perfluoroglutanic acid	376-73-8	-	-	-	-	-	-	
Perfluoro-3,6-dioxahaphtanoic acid	151772-58-6	-	-	-	-	-	-	
Perfluoroadipic acid	338-08-3	-	-	-	-	-	-	
Perfluoro-3,6-dioxadecane-1,8-dioic acid	55621-21-1	-	-	-	-	-	-	
Perfluoro-3,6,9-trioxadecanoic acid	151772-59-7	-	-	-	-	-	-	
Perfluoro-3,6,9-trioxadecanoic acid	678-45-5	-	-	-	-	-	-	
Perfluorosuberic acid	137790-69-9	-	-	-	-	-	-	
Perfluoro-3,6,9-trioxadecane-1,11-dioic acid	55621-18-6	-	-	-	-	-	-	
Perfluoroazelaic acid	23453-64-7	-	-	-	-	-	-	
Perfluoro-3,7-dimethyladecanoic acid	172155-07-8	-	-	-	-	-	-	
Perfluorosebacic acid	307-78-8	-	-	-	-	-	-	
Bromine	7726-95-6	TAMIS	7.00	0.70	-	-	-	
Perfluorohexyl bromide	335-56-8	-	-	-	-	-	-	
Perfluorooctyl bromide	375-88-2	-	-	-	-	-	-	
Perfluorononyl bromide	558-86-3	-	-	-	-	-	-	
Perfluorodecyl bromide	307-43-7	-	-	-	-	-	-	
Perfluoro-1,4-dibromobutane	335-48-8	-	-	-	-	-	-	
Perfluoro-1,6-dibromohexane	918-22-9	-	-	-	-	-	-	
Perfluoro-1,8-dibromooctane	812-58-8	-	-	-	-	-	-	
Perfluoro-2,5,8-trioxanonyl bromide	330562-45-3	-	-	-	-	-	-	
Perfluoro-2,5-dioxanonyl bromide	330562-46-4	-	-	-	-	-	-	
Perfluoro-2,5,8-trioxadodecyl bromide	330562-47-5	-	-	-	-	-	-	
Perfluoro-1,6-dibromo-2,5-dioxahexane	330562-48-6	-	-	-	-	-	-	
Perfluoro-1,9-dibromo-2,5,8-trioxanonane	330562-49-7	-	-	-	-	-	-	
polymers of chlorotrifluoroethylene (PCTFE)	9002-83-9	2008 Email	1000.00	100.00	-	-	-	
Toluene	108-88-3	TAMIS	4500.00	1200.00	-	-	-	
Butylated Hydroxytoluene	128-37-0	TAMIS	Must Meet NAAQS	Must Meet NAAQS	-	-	-	
PDO Diol	-	-	-	-	-	-	-	
Perfluorosuccinic anhydride	699-30-9	-	-	-	-	-	-	
Perfluoroglutaric anhydride	376-68-1	-	-	-	-	-	-	
Acrylic Acid	79-10-7	TAMIS	60.00	6.00	-	-	-	
1H,1H-Perfluoro-n-octyl acrylate	307-98-2	-	-	-	-	-	-	
1H,1H-Perfluoro-n-decyl acrylate	335-83-1	-	-	-	-	-	-	
1H,1H-Perfluoro-n-octyl methacrylate	3934-23-4	-	-	-	-	-	-	
1H,1H-Perfluoro-n-decyl methacrylate	23069-32-1	-	-	-	-	-	-	
1H,1H,6H,8H-Perfluoro-1,6-hexanediol diacrylate	2264-01-9	-	-	-	-	-	-	
Perfluoro-1(5)-crown-5 ether	97571-69-2	-	-	-	-	-	-	
Fluorinated PMG 250 Diol	146191-87-9	-	-	-	-	-	-	
Hydrogen Chloride	7647-01-0	TAMIS	190.00	7.90	7.5E-03	0.03	3.6E-03	
Fluorinated Poly (Trimethylene Glycol)	-	-	-	-	-	-	-	
Tetraethylene glycol dimethyl ether	143-24-8	-	-	-	-	-	-	
Perfluoro(Diethylene Glycol Monoisobutyl Ether)	1423231-12-2	-	-	-	-	-	-	
Perfluorocyclohexyl methanol	28788-68-3	-	-	-	-	-	-	

Emissions

Exfluro Florence Plant Scaling Analysis and MERA

PROPOSED EMISSIONS FOR FLORENCE SITE

Pollutant	CAS	ESL Source	ESL		FUG3-2		FUG3-3	
			(µg/m ³)	(µg/m ³)	(lbs/hr)	(tons/yr)	(lbs/hr)	(tons/yr)
Perfluoropolyethylene Glycol 400, -CH ₂ OH terminated	146222-54-0	-	-	-	-	-	-	-
Ethyl acetate	141-78-6	TAMIS	3100.00	1440.00	8.1E-03	0.04	-	-
Perfluoro-4-butylcyclohexane	84808-64-0	2008 Email	200.00	20.00	-	-	-	-
1,1,2-Trichloro-1,2,2-trifluoroethane	76-13-1	TAMIS	38000.00	3800.00	-	-	-	-
Perfluorobutyl Vinyl Fluoride	335-42-2	-	-	-	-	-	-	-
Perfluoropropane	76-19-7	TAMIS	10000.00	1000.00	-	-	-	-
Carbon tetrafluoride	75-73-0	TAMIS	18000.00	1800.00	-	-	-	-
Tetrahydrofuran	109-99-9	TAMIS	1500.00	150.00	0.02	0.07	0.02	0.10
Acid Fluorides	-	TAMIS	-	-	-	-	-	-
Hydrogen Bromide	10035-10-6	TAMIS	100.00	10.00	-	-	-	-
Oxides of Nitrogen	10102-43-9	TAMIS	Must Meet NAAQS	Must Meet NAAQS	-	-	-	-
Carbon Monoxide	630-08-0	TAMIS	Must Meet NAAQS	Must Meet NAAQS	-	-	-	-
Particulate Matter (PM ₁₀ , PM _{2.5})	-	-	Must Meet NAAQS	Must Meet NAAQS	-	-	-	-

PROPOSED EMISSIONS FOR FLORENCE SITE

Pollutant	CAS	ESL Source	Short-Term ESL (µg/m³)	Long-Term ESL (µg/m³)	FUG3-4	
					(lb/yr)	(tons/yr)
Hydrogen Fluoride	7664-39-3	TAMIS	18.00	8.70	-	-
Hydrogen Fluoride (Agriculture)	7664-39-3	TAMIS	3.00	0.60	-	-
Hydrogen Fluoride (Agriculture with Cattle)	7664-39-3	TAMIS	n/a	0.75	-	-
Difluorine	7782-41-4	TAMIS	2.00	0.20	-	-
Carbonyl Fluoride	353-50-4	TAMIS	17.00	8.10	-	-
Carbonyl Fluoride (Agriculture)	353-50-4	TAMIS	2.80	0.57	-	-
Carbonyl Fluoride (Agriculture with Cattle)	353-50-4	TAMIS	n/a	0.71	-	-
Acetyl Fluorides	354-34-7	2008 Email	200.00	20.00	-	-
Trifluoroacetic acid	76-05-1	TAMIS	17.00	8.10	-	-
Trifluoroacetic acid (Agriculture)	76-05-1	TAMIS	2.80	0.57	-	-
Trifluoroacetic acid (Agriculture with Cattle)	76-05-1	TAMIS	n/a	0.71	-	-
Perfluoropentanoyl fluoride	375-62-2	-	-	-	-	-
Perfluorohexanoyl fluoride	355-38-4	-	-	-	-	-
Perfluoroheptanoyl fluoride	375-84-8	-	-	-	-	-
Perfluorooctanoyl fluoride	335-66-0	-	-	-	-	-
Perfluorononanoyl fluoride	538-95-2	-	-	-	-	-
Perfluorodecyl fluoride	594-98-9	2008 Email	200.00	20.00	-	-
Perfluoroundecyl fluoride	679-13-0	-	-	-	-	-
Hexafluoroglutaryl fluoride	678-78-4	-	-	-	-	-
Octafluoroadipyl fluoride	37881-62-2	-	-	-	-	-
Perfluorosuberoyl fluoride	24647-09-4	-	-	-	-	-
Perfluorosebacoyl fluoride	-	-	-	-	-	-
Perfluorobutoxyethoxyacetyl fluoride	172897-75-5	-	-	-	-	-
Perfluoroethylacyl fluoride	24647-19-6	-	-	-	-	-
Perfluoro-3,6,9-Trioxadecanoyl fluoride	883733-06-0	-	-	-	-	-
Perfluoroheptadecyl fluoride	24689-56-3	-	-	-	-	-
Perfluoro-3,6,9-trioxadecanoic acid	330562-41-9	-	-	-	-	-
Perfluoropolyethylene Glycol Glycoyl fluoride	-	-	-	-	-	-
Perfluoropolyethylene acyl fluoride	-	-	-	-	-	-
Perfluoropolytetramethylene acyl fluoride	-	-	-	-	-	-
Perfluoropolydioxolane diacyl fluoride	-	-	-	-	-	-
Perfluorocyclohexyl carbonyl fluoride	6588-63-2	-	-	-	-	-
Perfluoropolyethylene Glycol Diol	-	-	-	-	-	-
Perfluoropolydioxolane Diol	-	-	-	-	-	-
Perfluoro (polyethylene glycol) diacid fluoride	-	-	-	-	-	-
Perfluoro (polytetramethylene glycol) diacid fluoride	-	-	-	-	-	-
Perfluoro (polytetramethylene glycol) diacid fluoride	882695-72-9	-	-	-	-	-
Tetrachlorohexafluorobutane	375-34-8	-	-	-	-	-
Pentachloropentaffluorobutane	375-46-2	-	-	-	-	-
Hexachloroheptafluorobutane	375-49-5	-	-	-	-	-
Perfluoro (bis-2-chloroethoxy methane)	130085-19-7	2008 Email	200.00	20.00	-	-
Perfluoropentane	678-26-2	TAMIS	-	-	-	-
Perfluorohexane	355-42-0	TAMIS	10000.00	1000.00	-	-
Perfluoroheptane	335-57-9	TAMIS	2007.00	20.00	-	-
Perfluorooctane	307-34-6	2008 Email	20000.00	2000.00	-	-
Perfluorononane	375-96-2	-	-	-	-	-
Perfluorodecane	376-03-4	-	-	-	-	-
Perfluorododecane	2264-03-1	-	-	-	-	-
Perfluoropentadecane	306-94-5	2008 Email	200.00	20.00	-	-
Perfluorooctadecane	306-91-2	-	-	-	-	-
Perfluorooctadecane	306-92-3	-	-	-	-	-
Perfluorodimethylcyclohexane	306-98-9	-	-	-	-	-
Perfluoropenthydrofluorene	307-08-4	-	-	-	-	-

Emissions

Exfluror Florence Plant Scaling Analysis and MERA

PROPOSED EMISSIONS FOR FLORENCE SITE

Pollutant	CAS	ESL Source	Short-Term ESL (µg/m ³)	Long-Term ESL (µg/m ³)	FIGS-4 (lbs/yr)	FIGS-4 (tones/yr)
Perfluorodisopropylcyclohexane	75769-51-6	-	-	-	-	-
Perfluorocetyl bromide	423-55-2	-	-	-	-	-
Methyl perfluoropentanoate	13038-26-1	-	-	-	-	-
Methyl perfluorohexanoate	424-18-0	-	-	-	-	-
Methyl perfluoroheptanoate	14312-89-1	-	-	-	-	-
Methyl perfluorooctanoate	376-27-2	-	-	-	-	-
Methyl perfluorononoate	51502-45-5	-	-	-	-	-
Methyl perfluorodecanoate	307-79-7	-	-	-	-	-
Methyl perfluorododecanoate	56554-52-0	-	-	-	-	-
Methyl perfluorotetradecanoate	203302-99-2	-	-	-	-	-
Methyl perfluorohexadecanoate	165457-57-8	-	-	-	-	-
Dimethyl perfluorosuccinate	356-36-5	-	-	-	-	-
Dimethyl perfluoroglutarate	1513-62-8	-	-	-	-	-
Dimethyl perfluoroadipate	3107-98-0	-	-	-	-	-
Dimethyl perfluoro-3,6-dioxocane-1,8-dioate	24647-20-9	-	-	-	-	-
Methyl perfluoro-3,6-troxadecanoate	169289-58-1	-	-	-	-	-
Dimethyl perfluorosuberate	2062-20-6	-	-	-	-	-
Dimethyl perfluoro-3,6,9-troxauodecane-1,11-dioate	35910-59-9	-	-	-	-	-
Methyl perfluoro-3,6-dioxadecanoate	129301-40-2	-	-	-	-	-
Dimethyl perfluoroazalate	2216-90-1	-	-	-	-	-
Dimethyl perfluorosebacate	4590-24-3	-	-	-	-	-
Methyl perfluoroundecanoate	203302-98-1	-	-	-	-	-
Dimethyl perfluoro-1,12-decanediclate	84750-88-9	-	-	-	-	-
Perfluoropolyethylene	-	-	-	-	-	-
Methanol	67-56-1	TAMIS	3900.00	2100.00	-	-
Methyl perfluoro-3,6-dioxahexanoate	39187-41-2	-	-	-	-	-
Methyl perfluoro-3,6,9-troxatridecanoate	330562-42-0	-	-	-	-	-
Isopropyl Alcohol	67-63-0	TAMIS	4920.00	492.00	-	-
1H,1H-Perfluoro-1-pentanol	356-28-2	-	-	-	-	-
1H,1H-Perfluoro-1-hexanol	423-46-1	-	-	-	-	-
1H,1H-Perfluoro-1-heptanol	375-82-6	-	-	-	-	-
1H,1H-Perfluoro-1-octanol	307-30-2	-	-	-	-	-
1H,1H-Perfluoro-1-nonanol	423-56-3	-	-	-	-	-
1H,1H-Perfluoro-1-decanol	307-37-9	-	-	-	-	-
1H,1H-Perfluoro-1-undecanol	307-46-0	-	-	-	-	-
1H,1H-Perfluoro-1-dodecanol	423-65-4	-	-	-	-	-
1H,1H-Perfluoro-1-tetradecanol	15622-57-8	-	-	-	-	-
Perfluoro-3,7-dimethyloctan-1-ol	232687-50-7	-	-	-	-	-
1H,1H,4H,4H-Perfluoro-1,4-butanediol	425-61-6	-	-	-	-	-
1H,1H,5H,5H-Perfluoro-1,5-pentanediol	376-90-9	-	-	-	-	-
1H,1H,6H,6H-Perfluoro-1,6-hexanediol	355-74-8	-	-	-	-	-
1H,1H,8H,8H-Perfluoro-1,8-octanediol	90177-96-1	-	-	-	-	-
1H,1H,9H,9H-Perfluoro-1,9-nonanediol	203303-01-9	-	-	-	-	-
1H,1H,10H,10H-Perfluoro-1,10-decanediol	754-96-1	-	-	-	-	-
1H,1H,12H,12H-Perfluoro-1,12-dodecanediol	183162-43-8	-	-	-	-	-
Perfluoro-tert-butanol	2378-02-1	2008 Email	1000.00	100.00	-	-
Fluorinated diethylene glycol monomethyl ether	330562-43-1	-	-	-	-	-
Fluorinated triethylene glycol monomethyl ether	147492-57-7	-	-	-	-	-
Fluorinated diethylene glycol monobutyl ether	152814-73-3	-	-	-	-	-
Fluorinated triethylene glycol monobutyl ether	317817-24-6	-	-	-	-	-
Fluorinated triethylene glycol	123301-42-4	-	-	-	-	-
Fluorinated tetraethylene glycol	330562-44-2	-	-	-	-	-
Perfluoropentanoic acid	2706-90-3	-	-	-	-	-
Perfluorohexanoic acid	307-24-4	-	-	-	-	-

PROPOSED EMISSIONS FOR FLORENCE SITE

Pollutant	CAS	ESL Source	Short-Term ESL (µg/m ³)	Long-Term ESL (µg/m ³)	FUG3.4	
					(lb/yr)	(ton/yr)
Perfluorohexanoic acid	375-85-9	-	-	-	-	-
Perfluorooctanoic acid	335-87-1	TAMIS	0.05	0.01	-	-
Perfluorononanoic acid	375-95-1	-	-	-	-	-
Perfluorodecanoic acid	335-76-2	2008 Email	14.00	1.40	-	-
Perfluoroundecanoic acid	2058-94-8	-	-	-	-	-
Perfluorododecanoic acid	307-55-1	-	-	-	-	-
Perfluorotridecanoic acid	865-85-0	-	-	-	-	-
Perfluorotetradecanoic acid	376-06-7	-	-	-	-	-
Perfluorohexadecanoic acid	67305-19-5	-	-	-	-	-
Perfluorooctanoic acid	377-38-8	-	-	-	-	-
Perfluoroglutaric acid	376-73-8	-	-	-	-	-
Perfluoro-3,6-dioxahexanoic acid	151772-58-6	-	-	-	-	-
Perfluoro-3,6-dioxaoctanoic acid	336-09-3	-	-	-	-	-
Perfluoro-3,6-dioxadecanoic acid	55621-21-1	-	-	-	-	-
Perfluoro-3,6,9-trioxadecanoic acid	151772-58-7	-	-	-	-	-
Perfluorosuberic acid	678-45-5	-	-	-	-	-
Perfluoro-3,6-dioxadecanoic acid	137780-68-9	-	-	-	-	-
Perfluoro-3,6,9-trioxadecanoic acid	55621-18-6	-	-	-	-	-
Perfluoroazelaic acid	23453-64-7	-	-	-	-	-
Perfluoro-3,7-dimethyloctanoic acid	172155-07-8	-	-	-	-	-
Perfluorosebacic acid	307-78-8	-	-	-	-	-
Bromine	7728-95-6	TAMIS	7.00	0.70	-	-
Perfluorohexyl bromide	335-56-8	-	-	-	-	-
Perfluorooctyl bromide	375-88-2	-	-	-	-	-
Perfluorononyl bromide	558-96-3	-	-	-	-	-
Perfluorodecyl bromide	307-43-7	-	-	-	-	-
Perfluoro-1,4-dibromobutane	335-48-8	-	-	-	-	-
Perfluoro-1,6-dibromohexane	918-22-9	-	-	-	-	-
Perfluoro-1,8-dibromooctane	812-58-8	-	-	-	-	-
Perfluoro-2,5,8-trioxanonyl bromide	330562-45-3	-	-	-	-	-
Perfluoro-2,5-dioxanonyl bromide	330562-46-4	-	-	-	-	-
Perfluoro-2,5,8-trioxadodecyl bromide	330562-47-5	-	-	-	-	-
Perfluoro-1,6-dibromo-2,5-dioxahexane	330562-48-6	-	-	-	-	-
Perfluoro-1,9-dibromo-2,5,8-trioxanane polymers of chlorotrifluoroethylene (PCTFE)	330562-48-7	-	-	-	-	-
Toluene	108-89-3	2008 Email	1000.00	100.00	-	-
Butylated Hydroxytoluene	128-37-0	TAMIS	4500.00	1200.00	-	-
PDO Diol	-	-	Must Meet NAAQS	Must Meet NAAQS	-	-
Perfluorosuccinic anhydride	699-30-9	-	-	-	-	-
Perfluoroglutaric anhydride	376-68-1	-	-	-	-	-
Acrylic Acid	79-10-7	TAMIS	60.00	6.00	-	-
1H,1H-Perfluoro-n-octyl acrylate	307-98-2	-	-	-	-	-
1H,1H-Perfluoro-n-decyl acrylate	335-83-1	-	-	-	-	-
1H,1H-Perfluoro-n-ethyl methacrylate	3834-23-4	-	-	-	-	-
1H,1H-Perfluoro-n-decyl methacrylate	23069-32-1	-	-	-	-	-
1H,1H,6H,6H-Perfluoro-1,6-hexamethoxy diacrylate	2264-01-9	-	-	-	-	-
Perfluoro-(15)-crown-5 ether	97571-69-2	-	-	-	-	-
Fluorinated PTMG 250 Diol	146191-87-9	-	-	-	-	-
Hydrogen Chloride	7647-01-0	TAMIS	190.00	7.90	-	-
Fluorinated Poly (Trimethylene Glycol)	-	-	-	-	-	-
Tetraethylene glycol dimethyl ether	143-24-8	-	-	-	-	-
Perfluoro(Diethylene Glycol Methyl Ether)	1423231-12-2	-	-	-	-	-
Perfluorocyclohexyl methanol	28788-68-3	-	-	-	-	-

PROPOSED EMISSIONS FOR FLORENCE SITE

Pollutant	CAS	ESL Source	Short-Term ESL (µg/m³)	Long-Term ESL (µg/m³)	FUG3-4	
					(lbs/yr)	(tons/yr)
Perfluoro(Polyethylene Glycol 400), -CH2OH terminated	146222-54-0	-	-	-	4.1E-03	0.02
Ethyl acetate	141-79-6	TAMIS	3100.00	1440.00	-	-
Perfluoro-t-butylcyclohexane	84808-54-0	2008 Email	200.00	20.00	-	-
1,1,2-Trichloro-1,2,2-trifluoroethane	76-13-1	TAMIS	38000.00	3800.00	-	-
Perfluorobutyl Vinyl Fluoride	335-42-2	-	-	-	-	-
Perfluoropropane	76-19-7	TAMIS	10000.00	1000.00	-	-
Carbon tetrafluoride	75-73-0	TAMIS	18000.00	1800.00	-	-
Tetrahydrofuran	109-99-9	TAMIS	1500.00	150.00	0.02	0.08
Acid Fluorides	-	-	-	-	-	-
Hydrogen Bromide	10035-10-6	TAMIS	100.00	10.00	-	-
Oxides of Nitrogen	10102-43-9	TAMIS	Must Meet	Must Meet	-	-
Carbon Monoxide	630-08-0	TAMIS	Must Meet	Must Meet	-	-
Particulate Matter (PM ₁₀ , PM _{2.5})	-	-	Must Meet	Must Meet	-	-

EXFLUOR RESEARCH CORPORATION
 INITIAL PERMIT APPLICATION FOR FLORENCE SITE
 AIR QUALITY ANALYSIS

JULY 2021

Minor NAAQS Preliminary Impacts Determination
 Modeled Rates for Emission Sources
 Proposed Total Emission Rates per EPN

EPN	NOx		CO (lb/hr)	PM10 ¹ (lb/hr)	PM2.5	
	(lb/hr)	(ton/yr)			(lb/hr)	(ton/yr)
EP3-1	0.045	0.199	0.062	3.78E-03	3.78E-03	1.66E-02
EP3-2	-	-	-	-	-	-
EP3-3	-	-	-	-	-	-
EP3-4	-	-	-	-	-	-
EP3-5	-	-	-	-	-	-
FUG3-1	-	-	-	-	-	-
FUG3-2	-	-	-	-	-	-
FUG3-3	-	-	-	-	-	-
FUG3-4	-	-	-	-	-	-
FUG3-5	-	-	-	-	-	-

1: Emissions of Butylated Hydroxytoluene are treated as PM₁₀ per Toxicology ESL database.

AERMOD UIM Output

EPN	Unit Impact (µg/m ³)/(1 lb/hr)			
	1-hr	8-hr	24-hr	Annual
EP3-1	154.4	44.1	19.6	2.8

Preliminary Impacts Determination - Scaling Summary

Pollutant	Averaging Time	SIL (µg/m ³)	1-Yr Max (µg/m ³)	Impacts Below SIL?
CO	1-Hour	2000	9.62	TRUE
CO	8-Hour	500	2.75	TRUE
NO ₂	1-Hour	7.5	7.01	TRUE
NO ₂	Annual	1	0.13	TRUE
PM ₁₀	24-Hour	5	7.40E-02	TRUE
Primary PM _{2.5}	24-Hour	-	7.40E-02	-

NAAQS Impacts
 Exfluor Florence Plant Scaling Analysis and MERA

**EXFLUOR RESEARCH CORPORATION
INITIAL PERMIT APPLICATION FOR FLORENCE SITE**

AIR QUALITY ANALYSIS

Primary PM _{2.5}	Annual	-	1.08E-02	-
Secondary PM _{2.5}	24-Hour	-	9.01E-05	-
Secondary PM _{2.5}	Annual	-	3.83E-06	-
Total PM _{2.5}	24-Hour	1.2	7.41E-02	TRUE
Total PM _{2.5}	Annual	0.2	1.08E-02	TRUE

Sample Calculation:

$$\begin{aligned}
 \text{EP3-1 1-hour NO}_2 \text{ Impacts} &= \text{EP3-1 NO}_x \text{ Emissions} * \text{1-hour EP3-1 UIM} * \text{1:1 Ratio NO}_x/\text{NO}_2 \\
 &= 0.045 \text{ lbs/hr} * 154.37 \text{ }\mu\text{g/m}^3 \text{ per lb/hr} \\
 &= 7.009 \text{ }\mu\text{g/m}^3
 \end{aligned}$$

$$\begin{aligned}
 \text{EP3-1 Annual NO}_2 \text{ Impacts} &= \text{EP3-1 NO}_x \text{ Emissions} * \text{Annual EP3-1 UIM} * \text{2000/8760} * \text{1:1 Ratio NO}_x/\text{NO}_2 \\
 &= 0.199 \text{ lbs/hr} * 2.85 \text{ }\mu\text{g/m}^3 \text{ per lb/hr} * \text{2000/8760} \\
 &= 0.129 \text{ }\mu\text{g/m}^3
 \end{aligned}$$

Health Effects Analysis - MERA Step 3 & Step 7
 Determining Conservative Impact with Unit Impact Scaling

Scaled Impact Determination Sample Calculation

Hourly Hydrogen Fluoride Impact of EPN EP3-1
 = Unit Impact EP3-1 (µg/m³) / (lb/hr) * EP3-1 Hourly HF ER (lb/hr)
 = 154.37366 (µg/m³) / (lb/hr) * 0.01
 = 1.14 µg/m³

	1-hour UIM (µg/m ³) / (lb/hr)							
	EP3-1	EP3-2	EP3-3	FUG3-1	FUG3-2	FUG3-3	FUG3-4	
Full Grid	154.37	56.87	57.54	37.36	57.59	55.58	58.87	
Ag Grid	120.14	24.42	24.34	24.76	26.27	24.92	26.10	

AERMOD Predicted Impacts (µg/m³) - Scaled Hourly Impact

Non-Criteria Pollutant	Short-Term ESL (µg/m ³)	Hourly Impact (µg/m ³)				Hourly Impact (µg/m ³)				Short-Term Total	Impact Exceeds ESL?
		EP3-1	EP3-2	EP3-3	FUG3-1	FUG3-2	FUG3-3	FUG3-4			
Hydrogen Fluoride	18.00	1.14	-	-	4.72	-	-	-	-	5.86	FALSE
Hydrogen Fluoride (Agriculture)	3.00	0.89	-	-	3.13	-	-	-	-	4.01	See Chemical Specific Modeling
Hydrogen Fluoride (Agriculture with Cattle)	n/a	-	-	-	-	-	-	-	-	-	-
Difluorine	2.00	0.02	-	-	3.86	-	-	-	-	3.87	See Chemical Specific Modeling
Carbonyl Fluoride (Agriculture with Cattle)	n/a	-	-	-	-	-	-	-	-	-	-
Trifluoroacetic acid (Agriculture with Cattle)	n/a	-	-	-	-	-	-	-	-	-	-
Perfluorohexane	200.00	2.42	-	-	19.09	-	-	-	-	21.51	FALSE
Methanol	3900.00	4.31	13.36	18.49	1.68	-	-	-	-	37.84	FALSE
Perfluorooctanoic acid	0.05	0.00	-	-	-	-	-	-	-	0.00	FALSE
Bromine	7.00	0.00	-	-	5.10	-	-	-	-	5.11	FALSE
Hydrogen Chloride	190.00	3.51	-	-	-	0.43	0.20	0.18	-	4.32	FALSE
Carbon tetrachloride	18000.00	153.45	-	-	-	-	-	-	-	153.45	FALSE
Perfluoro (bis-2-chloroethoxy methane)	200.00	2.68	-	-	4.29	-	-	-	-	6.97	FALSE
Perfluorodecalin	200.00	1.64	-	-	20.01	-	-	-	-	21.65	FALSE
polymers of chlorotrifluoroethylene (PCTE)	1000.00	0.05	6.76	9.58	1.05	-	-	-	-	17.44	FALSE

Health Effects Analysis - MERA Step 3 & Step 7
 Determining Conservative Impact with Unit Impact Scaling

Scaled Impact Determination Sample Calculation

Annual Hydrogen Fluoride Impact of EPN EP3-1
 = Unit Impact EP3-1 (µg/m³) / (lb/hr) * EP3-1 Annual Phenol ER (tons/yr) * 2000 lbs/ton / 3760 hrs/yr
 = 2.84758 (µg/m³) / (lb/hr) * 0.052 / 4.38
 = 0.03 µg/m³

	Annual UIM (µg/m ³) / (lb/hr)			
	EP3-1	EP3-2	EP3-3	EP3-4
Full Grid	2.85	4.06	4.10	4.10
Ag Grid	2.23	1.65	1.64	1.64

	Annual Impact (µg/m ³)			
	FUG3-1	FUG3-2	FUG3-3	FUG3-4
Full Grid	2.92	3.86	3.93	3.98
Ag Grid	1.99	1.71	1.68	1.68

AERMOD Predicted Impacts (µg/m³) - Scaled Annual Impact

Non-Criteria Pollutant	Long-Term ESL (µg/m ³)	Annual Impact (µg/m ³)				Long-Term Total	Impact Exceeds ESL?
		EP3-1	EP3-2	EP3-3	EP3-4		
Hydrogen Fluoride	8.70	-	-	-	-	-	-
Hydrogen Fluoride (Agriculture)	0.60	-	-	-	-	-	-
Hydrogen Fluoride (Agriculture with Cattle)	0.75	0.02	-	-	0.25	0.27	FALSE
Difluorine	0.20	-	-	-	-	-	-
Carbonyl Fluoride (Agriculture with Cattle)	0.71	0.03	-	-	-	0.03	FALSE
Trifluoroacetic acid (Agriculture with Cattle)	0.71	0.03	-	-	-	0.03	FALSE
Perfluorooheptane	20.00	-	-	-	-	-	-
Methanol	2100.00	-	-	-	-	-	-
Perfluorooctanoic acid	0.01	-	-	-	-	-	-
Bromine	0.70	-	-	-	-	-	-
Hydrogen Chloride	7.90	0.06	-	-	0.03	0.01	0.11
Carbon tetrafluoride	1800.00	-	-	-	-	-	-
Perfluoro (bis-2-chloroethoxy methane)	20.00	-	-	-	-	-	-
Perfluorodecalin	20.00	-	-	-	-	-	-
polymers of chlorotrifluoroethylene (PCTFE)	100.00	-	-	-	-	-	-

State Health Effects Analysis
 TCEQ Modeling and Effects Review Analysis Logical Hierarchy (APDG 5874) (March 2018)

Qualifying Information

Pollutant Name	Hydrogen Fluoride	Hydrogen Fluoride (Agriculture)	Hydrogen Fluoride (Agriculture with Cattle)	Difluorine
CAS No.	7664-39-3	7664-39-3	7664-39-3	7782-41-4
Short-Term ESL (µg/m³)	18	3	n/a	2
Long-Term ESL (µg/m³)	8.7	0.6	0.75	0.2
Net Change in Hourly Emissions (lb/hr)	0.134	0.134	0.134	0.103
Net Change in Annual Emissions (TPY)	0.585	0.585	0.585	0.453
Total Hourly project increases (increase-only) (lbs/hr)	0.134	0.134	0.134	0.103
Total Annual project increases (increase-only) (tons/yr)	0.585	0.585	0.585	0.453
Total Hourly PTE project production increases only (lbs/hr)	0.134	0.134	0.134	0.103
Total Annual PTE project production increases only (tons/yr)	0.585	0.585	0.585	0.453
Total Hourly PTE project MSS increases (lbs/hr)	-	-	-	-
Total Annual PTE project MSS increases (tons/yr)	-	-	-	-

Modeling and Effects Review Applicability (MERA) Guideline Steps

1	Is the net change in emissions ≤ 0?	No	No	No	No
2	De Minimis Increase <ul style="list-style-type: none"> * Is the LTESL ≥ 10% STESL? * Does this project involve MSS emission increases? * Do MSS emissions overlap with Routine Production Emissions? ** Are hourly Production / PTE increases ≤ 0.04 lb/hr and STESL = [2, 500]? ** Are hourly Production / PTE increases ≤ 0.1 lb/hr and STESL = [500, 3500]? ** Are hourly Production / PTE increases ≤ 0.4 lb/hr and STESL ≥ 3500? ** Are hourly MSS increases ≤ 0.1 lb/hr and STESL = [2, 3500]? *** Are hourly MSS increases ≤ 0.4 lb/hr and STESL ≥ 3500? 	Yes No No No No No No	Yes No No No No No No	No No No No No No No	Yes No No No No No No
3	Summed Unit-Impact Concentration <ul style="list-style-type: none"> * 10% of Short-term ESL (µg/m³) * Hourly GL_{Cmax} concentration (µg/m³) (AERMOD UIM) * Is Hourly GL_{Cmax} ≤ 10% STESL? * Is the LTESL ≥ 10% STESL? * 10% of Long-term ESL (µg/m³) * Max annual off-property concentration (µg/m³) (AERMOD UIM) * Is Annual GL_{Cmax} ≤ 10% STESL? 	1.8 5.855 No Yes - Skip Annual	0.3 4.013 No Yes - Skip Annual	- - - 0.075 0.267	0.2 3.873 No Yes - Skip Annual
7	Conduct Site-wide Modeling and submit Air Quality Analysis <ul style="list-style-type: none"> * Short-term ESL (µg/m³) * Hourly GL_{Cmax} concentration (µg/m³) (UIM or Chemical Specific Modeling) * Is Hourly GL_{Cmax} ≤ STESL? * Long-term ESL (µg/m³) * Annual GL_{Cmax} concentration (µg/m³) (AERMOD UIM) * Is Annual GL_{Cmax} ≤ LTESL? 	Pending 18 5.856 Yes - Step 8	Pending 3 3.848 No	Pending - - 0.75 0.267	Pending 2 3.875 No
8	Scope of MERA evaluation is complete.	Complete	Complete	Yes - Step 8 Complete	Complete

State Health Effects Analysis
 TCEQ Modeling and Effects Review Analysis Logical Hierarchy (APPG 5874) (March 2018)

Qualifying Information

Pollutant Name	Metharol	Isopropyl Alcohol	Perfluorooctanoic acid	Bromine
CAS No.	67-56-1	67-63-0	335-67-1	7726-95-6
Short-Term ESL (µg/m³)	3900	4920	0.05	7
Long-Term ESL (µg/m³)	2100	492	0.005	0.7
Net Change in Hourly Emissions (lb/hr)	0.629	0.000	0.000	0.137
Net Change in Annual Emissions (TPY)	0.272	0.000	0.000	0.598
Total Hourly project increases (increase-only) (lbs/hr)	0.629	0.000	0.000	0.137
Total Annual project increases (increase-only) (tons/yr)	0.272	0.000	0.000	0.598
Total Hourly PTE project production increases only (lbs/hr)	0.629	0.000	0.000	0.137
Total Annual PTE project production increases only (tons/yr)	0.272	0.000	0.000	0.598
Total Hourly PTE project MSS increases (lbs/hr)	-	-	-	-
Total Annual PTE project MSS increases (tons/yr)	-	-	-	-

Modeling and Effects Review Applicability (MERA) Guideline Steps

1	Is the net change in emissions ≤ 0?	No	No	No	No
2	De Minimis Increase * Is the LTESL ≥ 10% STESL? * Does this project involve MSS emission increases? * Do MSS emissions overlap with Routine Production Emissions? * Are hourly Production / PTE increases ≤ 0.04 lb/hr and STESL = [2, 500]? * Are hourly Production / PTE increases ≤ 0.1 lb/hr and STESL = [500, 3500]? * Are hourly Production / PTE increases ≤ 0.4 lb/hr and STESL ≥ 3500? * Are hourly MSS increases ≤ 0.1 lb/hr and STESL = [2, 3500]? * Are hourly MSS increases ≤ 0.4 lb/hr and STESL ≥ 3500?	Yes No No No No No No	Yes No No No No No No	Yes No No No No No No	Yes No No No No No No
3	Summed Unit-Impact Concentration * 10% of Short-term ESL (µg/m³) * Hourly GLC _{max} concentration (µg/m³) (AERMOD UIM) * Is Hourly GLC _{max} ≤ 10% STESL? * Is the LTESL ≥ 10% STESL? * 10% of Long-term ESL (µg/m³) * Max annual off-property concentration (µg/m³) (AERMOD UIM) * Is Annual GLC _{max} ≤ 10% STESL?	390 37,833 Yes - Step 8 Yes - Skip Annual	0.005 0.000 Yes - Step 8 Yes - Skip Annual	0.7 5.106 No Yes - Skip Annual	Pending 7 5.106 Yes - Step 8
7	Conduct Site-wide Modeling and submit Air Quality Analysis * Short-term ESL (µg/m³) * Hourly GLC _{max} concentration (µg/m³) (UIM or Chemical Specific Modeling) * Is Hourly GLC _{max} ≤ STESL? * Long-term ESL (µg/m³) * Annual GLC _{max} concentration (µg/m³) (AERMOD UIM) * Is Annual GLC _{max} ≤ LTESL?	- - - - - -	- - - - - -	- - - - - -	- - - - - -
8	Scope of MERA evaluation is complete.	Complete	Complete	Complete	Complete

State Health Effects Analysis
 TCEQ Modeling and Effects Review Analysis Logical Hierarchy (APDG 5874) (March 2018)

Qualifying Information

Pollutant Name	Toluene	Burylated Hydroxytoluene	Acrylic Acid	Hydrogen Chloride
CAS No.	108-88-3	128-37-0	79-10-7	7647-01-0
Short-Term ESL ($\mu\text{g}/\text{m}^3$)	4500	Must Meet NAAQS	60	190
Long-Term ESL ($\mu\text{g}/\text{m}^3$)	1200	Must Meet NAAQS	6	7.9
Net Change in Hourly Emissions (lb/hr)	0.000	0.000	0.000	0.037
Net Change in Annual Emissions (TPY)	0.000	0.000	0.000	0.152
Total Hourly project increases (increase-only) (lbs/hr)	0.000	0.000	0.000	0.037
Total Annual project increases (increase-only) (tons/yr)	0.000	0.000	0.000	0.152
Total Annual PTE project production increases only (lbs/hr)	0.000	0.000	0.000	0.037
Total Annual PTE project production increases only (tons/yr)	0.000	0.000	0.000	0.152
Total Hourly PTE project MSS increases (lbs/hr)	-	-	-	-
Total Annual PTE project MSS increases (tons/yr)	-	-	-	-

Modeling and Effects Review Applicability (MERA) Guideline Steps

1	Is the net change in emissions ≤ 0 ?	No	No	No
2	De Minimis Increase * Is the LTESL $\geq 10\%$ STESL? * Does this project involve MSS emission increases? * Do MSS emissions overlap with Routine Production Emissions? ** Are hourly Production / PTE increases ≤ 0.04 lb/hr and STESL = [2, 500]? ** Are hourly Production / PTE increases ≤ 0.1 lb/hr and STESL = [500, 3500]? ** Are hourly Production / PTE increases ≤ 0.4 lb/hr and STESL ≥ 3500 ? *** Are hourly MSS increases ≤ 0.1 lb/hr and STESL = [2, 3500]? *** Are hourly MSS increases ≤ 0.4 lb/hr and STESL ≥ 3500 ?	Yes No No No No No Yes - Step 8	Yes No No Yes - Step 8	No No No - - - -
3	Summed Unit-Impact Concentration * 10% of Short-term ESL ($\mu\text{g}/\text{m}^3$) * Hourly GLC_{max} concentration ($\mu\text{g}/\text{m}^3$) (AERMOD UIM) * Is Hourly $\text{GLC}_{\text{max}} \leq 10\%$ STESL? * Is the LTESL $\geq 10\%$ STESL? * 10% of Long-term ESL ($\mu\text{g}/\text{m}^3$) * Max annual off-property concentration ($\mu\text{g}/\text{m}^3$) (AERMOD UIM) * Is Annual $\text{GLC}_{\text{max}} \leq 10\%$ STESL?			19 4,323 Yes - Step 8 No - Annual Required 0.79 0.114 -
7	Conduct Steward Modeling and submit Air Quality Analysis * Short-term ESL ($\mu\text{g}/\text{m}^3$) * Hourly GLC_{max} concentration ($\mu\text{g}/\text{m}^3$) (UIM or Chemical Specific Modeling) * Is Hourly $\text{GLC}_{\text{max}} \leq \text{STEsl}$? * Long-term ESL ($\mu\text{g}/\text{m}^3$) * Annual GLC_{max} concentration ($\mu\text{g}/\text{m}^3$) (AERMOD UIM) * Is Annual $\text{GLC}_{\text{max}} \leq \text{LTESL}$?			
8	Scope of MERA evaluation is complete.	Complete	Complete	Complete

State Health Effects Analysis
 TCEQ Modeling and Effects Review Analysis Logical Hierarchy (APDG 5874) (March 2018)

Qualifying Information

Pollutant Name	Ethyl acetate	1,1,2-Trichloro-1,2,2-trifluoroethane	Perfluoropropane	Carbon tetrafluoride
CAS No.	141-79-6	76-13-1	76-19-7	75-73-0
Short-Term ESL ($\mu\text{g}/\text{m}^3$)	3100	38000	10000	18000
Long-Term ESL ($\mu\text{g}/\text{m}^3$)	1440	3800	1000	1800
Net Change in Hourly Emissions (lb/hr)	0.0C9	0.045	0.045	0.994
Net Change in Annual Emissions (TPY)	0.0C6	0.197	0.197	4.354
Total Hourly project increases (increase-only) (lbs/hr)	0.0C9	0.045	0.045	0.994
Total Annual project increases (increase-only) (tons/yr)	0.0C6	0.197	0.197	4.354
Total Hourly PTE project production increases only (lbs/hr)	0.0C9	0.045	0.045	0.994
Total Annual PTE project production increases only (tons/yr)	0.0C6	0.197	0.197	4.354
Total Hourly PTE project MSS increases (lbs/hr)	-	-	-	-
Total Annual PTE project MSS increases (tons/yr)	-	-	-	-

Modeling and Effects Review Applicability (MERA) Guideline Steps

1	Is the net change in emissions ≤ 0 ?	Nc	No	No	No
2	De Minimis Increase * Is the LTESL $\geq 10\%$ STESL? * Does this project involve MSS emission increases? * Do MSS emissions overlap with Routine Production Emissions? * Are hourly Production / PTE increases ≤ 0.04 lb/hr and STESL = [2, 500]? ** Are hourly Production / PTE increases ≤ 0.1 lb/hr and STESL = [500, 3500]? *** Are hourly MSS increases ≤ 0.1 lb/hr and STESL = [2, 3500]? **** Are hourly MSS increases ≤ 0.4 lb/hr and STESL ≥ 3500 ? ***** Are hourly MSS increases ≤ 0.4 lb/hr and STESL ≥ 3500 ? Summed Unit-Impact Concentration * 10% of Short-term ESL ($\mu\text{g}/\text{m}^3$) * Hourly GLC_{MAX} concentration ($\mu\text{g}/\text{m}^3$) (AERMOD UIM) * Is Hourly $\text{GLC}_{\text{MAX}} \leq 10\%$ STESL? * Is the LTESL $\geq 10\%$ STESL? * 10% of Long-term ESL ($\mu\text{g}/\text{m}^3$) * Max annual off-property concentration ($\mu\text{g}/\text{m}^3$) (AERMOD UIM) * Is Annual $\text{GLC}_{\text{MAX}} \leq 10\%$ STESL? Conduct Stewwide Modeling and submit Air Quality Analysis * Short-term ESL ($\mu\text{g}/\text{m}^3$) * Hourly GLC_{MAX} concentration ($\mu\text{g}/\text{m}^3$) (UIM or Chemical Specific Modeling) * Is Hourly $\text{GLC}_{\text{MAX}} \leq \text{STESEL}$? * Long-term ESL ($\mu\text{g}/\text{m}^3$) * Annual GLC_{MAX} concentration ($\mu\text{g}/\text{m}^3$) (AERMOD UIM) * Is Annual $\text{GLC}_{\text{MAX}} \leq \text{L TESL}$? Scope of MERA evaluation is complete.	Yes Nc Nc Nc Yes - Step 8	Yes No No No Yes - Step 8	Yes No No No Yes - Step 8	Yes No No No No 1800 153,447 #REF! Yes - Skip Annual #REF!
7	Conduct Stewwide Modeling and submit Air Quality Analysis * Short-term ESL ($\mu\text{g}/\text{m}^3$) * Hourly GLC_{MAX} concentration ($\mu\text{g}/\text{m}^3$) (UIM or Chemical Specific Modeling) * Is Hourly $\text{GLC}_{\text{MAX}} \leq \text{STESEL}$? * Long-term ESL ($\mu\text{g}/\text{m}^3$) * Annual GLC_{MAX} concentration ($\mu\text{g}/\text{m}^3$) (AERMOD UIM) * Is Annual $\text{GLC}_{\text{MAX}} \leq \text{L TESL}$? Scope of MERA evaluation is complete.	Complete	Complete	Complete	Complete
8	Scope of MERA evaluation is complete.	Complete	Complete	Complete	Complete

State Health Effects Analysis
 TCEQ Modeling and Effects Review Analysis Logical Hierarchy (APDG 5874) (March 2018)

Qualifying Information

Pollutant Name	Tetrahydrofuran	Hydrogen Bromide	Acetyl Fluorides	Perfluorodecyl fluoride
CAS No.	109-99-9	10035-10-6	354-34-7	594-98-9
Short-Term ESL (µg/m³)	1500	100	200	200
Long-Term ESL (µg/m³)	150	10	20	20
Net Change in Hourly Emissions (lb/hr)	0.053	0.000	0.012	0.016
Net Change in Annual Emissions (TPY)	0.257	0.000	0.052	0.068
Total Hourly project increases (increase-only) (lbs/hr)	0.053	0.000	0.012	0.016
Total Annual project increases (increase-only) (tons/yr)	0.257	0.000	0.052	0.068
Total Hourly PTE project production increases only (lbs/hr)	0.053	0.000	0.012	0.016
Total Annual PTE project production increases only (tons/yr)	0.257	0.000	0.052	0.068
Total Hourly PTE project MSS increases (lbs/hr)	-	-	-	-
Total Annual PTE project MSS increases (tons/yr)	-	-	-	-

Modeling and Effects Review Applicability (MERA) Guideline Steps

1	Is the net change in emissions ≤ 0? <ul style="list-style-type: none"> * De Minimis Increase * Is the LTESL ≥ 10% STESL? 	No	No	No	No
2	<ul style="list-style-type: none"> * Does this project involve MSS emission increases? * Do MSS emissions overlap with Routine Production Emissions? ** Are hourly Production / PTE increases ≤ 0.04 lb/hr and STESL = [2, 500]? ** Are hourly Production / PTE increases ≤ 0.1 lb/hr and STESL = [500, 3500]? ** Are hourly Production / PTE increases ≤ 0.4 lb/hr and STESL ≥ 3500? *** Are hourly MSS increases ≤ 0.1 lb/hr and STESL = [2, 3500]? *** Are hourly MSS increases ≤ 0.4 lb/hr and STESL ≥ 3500? 	Yes No No No	Yes No No No	Yes No No No	Yes No No No
3	<ul style="list-style-type: none"> Summed Unit-Impact Concentration * 10% of Short-term ESL (µg/m³) * Hourly GLC_{max} concentration (µg/m³) (AERMOD UJM) * Is Hourly GLC_{max} ≤ 10% STESL? * Is the LTESL ≥ 10% STESL? * 10% of Long-term ESL (µg/m³) * Max annual off-property concentration (µg/m³) (AERMOD UJM) * Is Annual GLC_{max} ≤ 10% STESL? 	Yes - Step 8	Yes - Step 8	Yes - Step 8	Yes - Step 8
7	<ul style="list-style-type: none"> Conduct Sitewide Modeling and submit Air Quality Analysis * Short-term ESL (µg/m³) * Hourly GLC_{max} concentration (µg/m³) (UJM or Chemical Specific Modeling) * Is Hourly GLC_{max} ≤ STESL? * Long-term ESL (µg/m³) * Annual GLC_{max} concentration (µg/m³) (AERMOD UJM) * Is Annual GLC_{max} ≤ LTESL? 	Complete	Complete	Complete	Complete
8	Scope of MERA evaluation is complete.	Complete	Complete	Complete	Complete

State Health Effects Analysis
 TCEQ Modeling and Effects Review Analysis Logical Hierarchy (APDG 5874) (March 2018)

Qualifying Information

Pollutant Name	Perfluorodecanoic acid	polymers of chlorotrifluoroethylene (PCTFE)	Perfluoro-t-butylcyclohexane
CAS No.	335-76-2	9002-83-9	84808-64-0
Short-Term ESL ($\mu\text{g}/\text{m}^3$)	14	1000	200
Long-Term ESL ($\mu\text{g}/\text{m}^3$)	1.4	100	20.0
Net Change in Hourly Emissions (lb/hr)	0.000	0.314	0.003
Net Change in Annual Emissions (TPY)	0.000	0.143	0.013
Total Hourly project increases (increase-only) (lbs/hr)	0.000	0.314	0.003
Total Annual project increases (increase-only) (tons/yr)	0.000	0.143	0.013
Total Hourly PTE project production increases only (lbs/hr)	0.000	0.314	0.003
Total Annual PTE project production increases only (tons/yr)	0.000	0.143	0.013
Total Hourly PTE project MSS increases (lbs/hr)	-	-	-
Total Annual PTE project MSS increases (tons/yr)	-	-	-

Modeling and Effects Review Applicability (MERA) Guideline Steps

1	Is the net change in emissions ≤ 0 ?	No	No	No
2	De Minimis Increase * Is the LTESL $\geq 10\%$ STESL? * Does this project involve MSS emission increases? * Do MSS emissions overlap with Routine Production Emissions? * Are hourly Production / PTE increases ≤ 0.04 lb/hr and STESL = [2, 500]? ** Are hourly Production / PTE increases ≤ 0.1 lb/hr and STESL = [500, 3500]? *** Are hourly MSS increases ≤ 0.1 lb/hr and STESL = [2, 3500]? **** Are hourly MSS increases ≤ 0.4 lb/hr and STESL ≥ 3500 ?	Yes No No Yes - Step 8	Yes No No No No No	Yes No No Yes - Step 8
3	Summed Unit-Impact Concentration * 10% of Short-term ESL ($\mu\text{g}/\text{m}^3$) * Hourly GLC _{max} concentration ($\mu\text{g}/\text{m}^3$) (AERMOD UJM) * Is Hourly GLC _{max} $\leq 10\%$ STESL? * Is the LTESL $\geq 10\%$ STESL? * 10% of Long-term ESL ($\mu\text{g}/\text{m}^3$) * Max annual off-property concentration ($\mu\text{g}/\text{m}^3$) (AERMOD UJM) * Is Annual GLC _{max} $\leq 10\%$ STESL?	100 17,441 Yes - Step 8	Yes - Skip Annual	
7	Conduct Site-wide Modeling and submit Air Quality Analysis * Short-term ESL ($\mu\text{g}/\text{m}^3$) * Hourly GLC _{max} concentration ($\mu\text{g}/\text{m}^3$) (UJM or Chemical Specific Modeling) * Is Hourly GLC _{max} \leq STESL? * Long-term ESL ($\mu\text{g}/\text{m}^3$) * Annual GLC _{max} concentration ($\mu\text{g}/\text{m}^3$) (AERMOD UJM) * Is Annual GLC _{max} \leq LTESL? * Scope of MERA evaluation is complete.	Pending 1,000 17,441 Yes - Step 8		
8	Scope of MERA evaluation is complete.	Complete	Complete	Complete

Application Exhibit 12

TCEQ ED Air Quality Analysis Audit/Internal Correspondence

TCEQ Interoffice Memorandum

To: Cara Hill
Mechanical/Coatings Section

Thru: Chad Dumas, Team Leader
Air Dispersion Modeling Team (ADMT)

From: Ahmed Omar, P.E.
ADMT

Date: November 18, 2021

Subject: **Air Quality Analysis Audit – Exflur Research Corporation (RN110969227)**

1. Project Identification Information

Permit Application Number: 165848

NSR Project Number: 331049

ADMT Project Number: 7632

County: Williamson

Published Map: <\\tceq4avmgisdata\GISWRK\APD\MODEL PROJECTS\7632\7632.pdf>

Air Quality Analysis: Submitted by Waid Environmental, October 2021, on behalf of Exflur Research Corporation. Additional information was provided November 2021.

2. Report Summary

The air quality analysis is acceptable for all review types and pollutants. The results are summarized below.

A. Minor Source NSR and Air Toxics Analysis

Table 1. Modeling Results for Minor NSR De Minimis

Pollutant	Averaging Time	GLCmax ($\mu\text{g}/\text{m}^3$)	De Minimis ($\mu\text{g}/\text{m}^3$)
PM ₁₀	24-hr	0.1	5
PM _{2.5}	24-hr	0.1	1.2
PM _{2.5}	Annual	0.01	0.2
NO ₂	1-hr	7	7.5
NO ₂	Annual	0.1	1
CO	1-hr	10	2000
CO	8-hr	3	500

The GLCmax are the maximum predicted concentrations associated with one year of meteorological data.

TCEQ Interoffice Memorandum

Generic modeling was used for the above analyses; refer to section 3 for more details on the generic modeling.

The justification for selecting the EPA's interim 1-hr NO₂ De Minimis level was based on the assumptions underlying EPA's development of the 1-hr NO₂ De Minimis level. As explained in EPA guidance memoranda¹, the EPA believes it is reasonable as an interim approach to use a De Minimis level that represents 4% of the 1-hr NO₂ NAAQS.

The PM_{2.5} De Minimis levels are the EPA recommended De Minimis levels. The use of the EPA recommended De Minimis levels is sufficient to conclude that a proposed source will not cause or contribute to a violation of a PM_{2.5} NAAQS based on the analyses documented in EPA guidance and policy memorandums².

To evaluate secondary PM_{2.5} impacts, the applicant provided an analysis based on a Tier 1 demonstration approach consistent with the EPA's Guideline on Air Quality Models. Specifically, the applicant used a Tier 1 demonstration tool developed by the EPA referred to as Modeled Emission Rates for Precursors (MERPs). The basic idea behind the MERPs is to use technically credible air quality modeling to relate precursor emissions and peak secondary pollutants impacts from a source. Using data associated with the worst-case source, the applicant estimated 24-hr and annual secondary PM_{2.5} concentrations of 0.0001 µg/m³ and <0.0001 µg/m³, respectively. When these estimates are added to the GLCmax listed in the table above, the results are less than the De Minimis levels.

¹ www.tceq.texas.gov/assets/public/permitting/air/memos/guidance_1hr_no2naaqs.pdf

² www.tceq.texas.gov/permitting/air/modeling/epa-mod-guidance.html

TCEQ Interoffice Memorandum

Table 2. Minor NSR Site-wide Modeling Results for Health Effects

Pollutant	CAS#	Averaging Time	GLCmax ($\mu\text{g}/\text{m}^3$)	GLCmax Location	GLCni ($\mu\text{g}/\text{m}^3$)	GLCni Location	ESL ($\mu\text{g}/\text{m}^3$)
hydrogen fluoride	7664-39-3	1-hr	6	-	<6	-	18
hydrogen fluoride For air permit reviews in agricultural areas	7664-39-3	1-hr	3.9	Eastern Property Line	-	-	3
hydrogen fluoride For air permit reviews in agricultural areas with cattle	7664-39-3	Annual	0.3	-	-	-	0.75
fluorine	7782-41-4	1-hr	3.9	Western Property Line	3.9	Western Property Line	2
perfluoroheptane	335-57-9	1-hr	22	-	<22	-	20000
methanol	67-56-1	1-hr	38	-	<38	-	3900
perfluorooctanoic acid and its inorganic salts	335-67-1	1-hr	<0.01	-	<0.01	-	0.05
bromine	7726-95-6	1-hr	5	-	<5	-	7
hydrogen chloride	7647-01-0	1-hr	4	-	<4	-	190
hydrogen chloride	7647-01-0	Annual	0.1	-	<0.1	-	7.9
carbon tetrafluoride	75-73-0	1-hr	154	-	<154	-	18000
Perfluoro (bis-2-chloroethoxy methane)	Not found	1-hr	7	-	<7	-	200
Perfluorodecalin	306-94-5	1-hr	22	-	<22	-	200
polymers of chlorotrifluoroethylene (PCTFE)	9002-83-9	1-hr	17	-	<17	-	50

TCEQ Interoffice Memorandum

Pollutant	CAS#	Averaging Time	GLCmax ($\mu\text{g}/\text{m}^3$)	GLCmax Location	GLCni ($\mu\text{g}/\text{m}^3$)	GLCni Location	ESL ($\mu\text{g}/\text{m}^3$)
carbonyl fluoride For air permit reviews in agricultural areas with cattle	353-50-4	Annual	0.03	-	<0.03	-	0.71
trifluoroacetic acid For air permit reviews in agricultural areas with cattle	76-05-1	Annual	0.03	-	<0.03	-	0.71

Table 3. Minor NSR Hours of Exceedance for Health Effects

Pollutant	Averaging Time	1 X ESL GLCni
fluorine	1-hr	99

For fluorine, the GLCmax and the GLCni are the same. Pollutant-specific modeling was conducted for fluorine and 1-hr hydrogen fluoride at agricultural areas. For all other pollutants and averaging times, generic modeling was used; refer to section 3 for more details on the generic modeling.

TCEQ Interoffice Memorandum

3. Model Used and Modeling Techniques

AERMOD (Version 21112) was used in a refined screening mode.

A unitized emission rate of 1 lb/hr was used to predict a generic short-term and long-term impact for each source. The generic impact was multiplied by the proposed pollutant specific emission rates to calculate a maximum predicted concentration for each source. The maximum predicted concentration for each source was summed to get a total predicted concentration for each pollutant. Pollutant-specific modeling was conducted for fluorine and 1-hr hydrogen fluoride at agricultural areas.

A. Land Use

Medium roughness and elevated terrain were used in the modeling analysis. These selections are consistent with the AERSURFACE analysis, topographic map, DEMs, and aerial photography. The selection of medium roughness is reasonable.

B. Meteorological Data

Surface Station and ID: Austin, TX (Station #: 13904)
Upper Air Station and ID: Fort Worth, TX (Station #: 3990)
Meteorological Dataset: 2016
Profile Base Elevation: 150.9 meters

C. Receptor Grid

The grid modeled was sufficient in density and spatial coverage to capture representative maximum ground-level concentrations.

D. Building Wake Effects (Downwash)

Input data to Building Profile Input Program Prime (Version 04274) are consistent with the aerial photography, plot plan, and modeling report.

4. Modeling Emissions Inventory

The modeled emission point and volume source parameters and rates were consistent with the modeling report. The source characterizations used to represent the sources were appropriate.

The applicant assumed full conversion of NO_x to NO₂, which is conservative.

Maximum allowable hourly emission rates were used for the short-term averaging time analyses, and annual average emission rates were used for the annual averaging time analyses.

From: Ahmed Omar
Sent: Friday, November 19, 2021 7:58 AM
To: Cara Hill
Subject: RE: Modeling Request for Project Number: 331049
Attachments: Modeling Audit - 165848 Exfluor Research Corporation.docx

Good morning Cara,

The modeling audit is complete and the memo is attached. The WCC content ID is 5843027.

Please let me know if you have any question.

Thanks,

Ahmed

From: Chad Dumas <Chad.Dumas@Tceq.Texas.Gov>
Sent: Tuesday, October 26, 2021 11:40 AM
To: Cara Hill <Cara.Hill@Tceq.Texas.Gov>
Cc: Ahmed Omar <Ahmed.Omar@tceq.texas.gov>; Chad Dumas <Chad.Dumas@Tceq.Texas.Gov>;
Matthew Kovar <matthew.kovar@tceq.texas.gov>; Daniel Jamieson <daniel.jamieson@tceq.texas.gov>;
Philip Leung <Philip.Leung@Tceq.Texas.Gov>
Subject: Modeling Request for Project Number: 331049

CARA HILL,

Your request for a Modeling Audit has been assigned as follows:

- Modeler Assigned: **AHMED OMAR**
- Company Name: **EXFLUOR RESEARCH CORPORATION**
- Permit Number: **165848**
- Regulated Entity Number: **RN110969227**
- Proposed Due Date: **Saturday, December 25, 2021**
- County: **WILLIAMSON**
- NSR Project Number: **331049**
- Modeling Project Number: **7632**
- Requester Comments:

Expedited. Intial permit for fluorine manufacturing plant. NAAQS and health effects. State permit only.

- Modeler Comments:

Expedited Project:

From: Ahmed Omar
Sent: Monday, November 22, 2021 7:43 AM
To: Steve Sun; Cara Hill
Subject: RE: Project 331049 Permit 165848 Exflur Research Corporation

The modeling audit is complete and I do not need any hours for the modeling.

Thanks,

Ahmed

From: Steve Sun <steve.sun@tceq.texas.gov>
Sent: Monday, November 22, 2021 7:41 AM
To: Ahmed Omar <Ahmed.Omar@tceq.texas.gov>; Cara Hill <Cara.Hill@Tceq.Texas.Gov>
Subject: RE: Project 331049 Permit 165848 Exflur Research Corporation

The balance is at \$65.73. The system will probably prevent you from entering another activity so you may need to put this one on hold. I will send a zero balance letter.

Steve Sun
Technical Specialist
Air Permits Division
(512) 239-3554



How are we doing? Fill out our online customer satisfaction survey at www.tceq.texas.gov/customersurvey

From: Ahmed Omar <Ahmed.Omar@tceq.texas.gov>
Sent: Monday, November 8, 2021 11:05 AM
To: Cara Hill <Cara.Hill@Tceq.Texas.Gov>; Steve Sun <Steve.Sun@tceq.texas.gov>
Subject: RE: Project 331049 Permit 165848 Exflur Research Corporation

I may need about 10 to 20 hours more.

Thanks,

Ahmed

From: Cara Hill <Cara.Hill@Tceq.Texas.Gov>
Sent: Monday, November 8, 2021 11:01 AM
To: Steve Sun <steve.sun@tceq.texas.gov>
Cc: Ahmed Omar <Ahmed.Omar@tceq.texas.gov>
Subject: RE: Project 331049 Permit 165848 Exflur Research Corporation

I think I will need about 20-30 more hours for me, plus the hours we will need for modeling.

Thanks,
Cara

How is our customer service? www.tceq.texas.gov/customersurvey

From: Steve Sun <steve.sun@tceq.texas.gov>

Sent: Monday, November 8, 2021 10:54 AM

To: Cara Hill <Cara.Hill@Tceq.Texas.Gov>

Cc: Ahmed Omar <Ahmed.Omar@tceq.texas.gov>

Subject: Project 331049 Permit 165848 Exfluor Research Corporation

Cara,

The balance on this project is at \$704.01. How much more time do you need on this project.

Steve Sun
Technical Specialist
Air Permits Division
(512) 239-3554



How are we doing? Fill out our online customer satisfaction survey at
www.tceq.texas.gov/customersurvey

Application Exhibit 13

TCEQ and Applicant Correspondence on Draft Special Conditions and MAERT and Other Matters

From: Joerg Windolph <JWindolph@WAID.com>
Sent: Tuesday, November 30, 2021 9:36 AM
To: Cara Hill
Cc: arloe.fontenot@exflor.com; Tom Bierschenk
Subject: RE: 165848 Exflor Research (Initial, 331049)
Attachments: Proposed Flexibiity Condition.docx

Cara,

On behalf of Exflor Research I am providing comments on the draft special conditions and MAERT of Permit No. 165848 (Project No. 331049) that you provided on November 9, 2021.

Thermal Oxidizers

Special Condition Nos. 6.B./7.B. The thermal oxidizer firebox exit temperature shall be maintained at not less than 1400°F and exhaust oxygen concentration not less than 3 percent on a six-minute average while waste gas is being fed into the oxidizer.

The thermal oxidizers are fired with hydrogen fuel. The hydrogen burns at a temperature of greater than 2000 deg Celcius. We propose to change this condition so that we will be required to maintain the firebox temperature that will be measured during the performance testing of thermal oxidizers.

Special Condition No. 7.A. Thermal Oxidizer 2 (EPN EP3-2), shall maintain the VOC concentration in the exhaust gas less than 10 ppmv on a dry basis, corrected to 3 percent oxygen, or achieve a VOC destruction efficiency greater than 99.9 percent.

Please change the EPN of Thermal Oxidizer 2 to EPN EP3-1.

Scrubbers

Special Condition No. 8.A. The scrubber shall operate with no less than 99.9% percent removal efficiency for HF and HCl on an hourly average.

The purpose of the fluorine scrubbers is to convert the unreacted fluorine to HF so that it can be reused. The fluorine scrubber does not remove/control HF or HCl. Please remove this special condition.

Special Condition No. 8.B. The minimum liquid flow to the absorber shall be 0.80 gpm. The circulation rate shall be monitored and recorded at least once an hour.

The flow monitoring device shall be calibrated at a frequency in accordance with the manufacturer's specifications, or at least annually, whichever is more frequent, and shall be accurate to within 2 percent of span or 5 percent of the design value.

Quality assured (or valid) data must be generated when the scrubber is operating except during the performance of a daily zero check. Loss of valid data due to periods of monitor breakdown, out-of-control operation (producing inaccurate data), repair, maintenance, or calibration may be exempted provided it does not exceed 5 percent of the time (in hours) that the scrubber operated over the previous rolling 12-month period. The measurements missed shall be estimated using engineering judgment and the methods used recorded.

There is no liquid flow in the Fluorine scrubber. The fluorine scrubber is not an adsorber. The purpose of the fluorine scrubber is to convert unreacted fluorine gas to gaseous HF. The gaseous HF will be reused in the process. Please delete this special condition.

Special Condition No. 8.C. The scrubbing solution shall be maintained at or above a pH of (#). The pH shall be continuously analyzed and recorded at least once a minute. Each monitoring device shall be cleaned with an automatic cleaning system, or cleaned weekly using hydraulic, chemical, or mechanical cleaning. Each monitoring device shall be calibrated at a frequency in accordance with the manufacturer's specifications, or at least weekly, whichever is more frequent, and shall be accurate to within ± 0.5 pH unit.

Quality assured (or valid) data must be generated when the scrubber is operating except during the performance of a daily zero and span check. Loss of valid data due to periods of monitor break down, out-of-control operation (producing inaccurate data), repair, maintenance, or calibration may be exempted provided it does not exceed 5 percent of the time (in hours) that the scrubber operated over the previous rolling 12 month period. The measurements missed shall be estimated using engineering judgement and the methods used recorded.

Please delete this special condition. There is no scrubbing solution.

HF Adsorbers

Special Condition No. 1.A. The HF Adsorption Towers shall be sampled and recorded continuously by a CEMS to assure the HF concentration does not exceed 10.0 ppmv. An alarm shall be installed such that an operator is alerted and can take action before the HF Adsorption Towers outlet concentration exceeds the maximum allowable concentration.

The HF concentration coming out of the primary and the backup HF adsorption columns is much higher than 10 ppm. That is why the vent is sent to the thermal oxidizer which removes 99.9% of the remaining HF in the stream. Please delete this special condition.

Fugitives

Special Condition No. 1 The HF-sensitive paint shall be maintained on all the external surfaces of all components in HF service. If discoloration is noted, any necessary, corrective action shall be taken as described in Special Condition No. 11.

Exflur did not propose the use of HF-sensitive paint in the permit application. Instead, we proposed to use HF monitors. The HF monitors will be located in the production area of the building. Upon detection of HF, the monitors will sound off with an audible alarm informing the operators of HF in the production area. We feel that an audible alarm from a monitor provides better detection of HF than HF sensitive paint. Therefore delete this special condition.

MAERT

There is only one correction on the MAERT. Please change the annual emission rate of fluorine (F2) at EPN FUG3-1 from 0.56 tpy to 0.45 tpy.

Other Comments/Question

Exflur would also like to include a permit condition that would allow for chemical flexibility. Please see the attached proposed condition.

Although we are already at the draft permit stage, we would like to gain additional clarity on how the TCEQ defines VOC in relation to perfluorinated hydrocarbons. Traditional definitions hold that VOCs hold a vapor pressure at or below 20C (68F), participate in atmospheric photochemical reactions, and cause ground level ozone. Many of our chemicals would not be classified as VOCs per these

definitions. However the EPA has 3 different classifications of VOCs based on boiling point from 0-400C. Please let us know how we should define VOC in relation to perfluorinated hydrocarbons.

We would like to have a conference call to discuss our comments and the path forward once you had a chance to review our comments. Please let us know of your availability.

Joerg Windolph, P.E.
Principal Engineer

Waid Environmental

13785 Research Blvd., Suite 100

Austin, Texas 78750

Office: 512-255-9999

Cell: 512-550-8147

<http://www.waid.com>

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From: Cara Hill <Cara.Hill@Tceq.Texas.Gov>

Sent: Tuesday, November 9, 2021 12:03 PM

To: Joerg Windolph <JWindolph@WAID.com>

Cc: arloe.fontenot@exfluoer.com; Tom Bierschenk <bierschenk_t@exfluoer.com>

Subject: 165848 Exfluoer Research (Initial, 331049)

Hi Joerg,

I've attached the draft permit. Please let me know if you would like to discuss the draft. I realize there will likely need to be some changes to the language and monitoring given this is a unique process, and it might be easier to discuss in a call once you have had a chance to review.

Thanks,
Cara Hill
TCEQ Air Permits
512-239-5123

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Thanks,
Cara Hill
TCEQ Air Permits
512-239-5123

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Special Conditions

OPERATIONAL FLEXIBILITY

1. Except as provided for below, the use of compounds at the Exflur Research Corporation facility is limited to those identified in the permit application, PI-1 dated, July 7, 2021 (including subsequent submittals made during the permit application review process). New compounds may be added through the use of the procedure below, 30 TAC Chapter 106, or 30 TAC Chapter 116.
 - A. Short-term (pounds per hour [lb/hr]) and annual (TPY) emissions and calculations shall be completed for each chemical at each affected source. Emission rates (ER) shall be calculated with the methods documented in the permit application PI-1 dated, July 7, 2021. The calculated ER shall not exceed the maximum allowable emissions rate at any emission point.
 - B. The Effect Screening Level (ESL) for the compound shall be obtained from the current TCEQ ESL list or by written request to the TCEQ Toxicology Section.
 - C. The new compounds or chemicals shall serve the same basic function and the emissions shall be from the same location as the emissions from the current materials.
 - D. All the compounds within a new mixture are known, i.e. the weight percentages of the ingredients add to 100 percent or more.
 - E. Any air contaminant compound in a new mixture is exempt from the requirements of subparagraph F. below if it meets one of the following conditions:

- (1) It is emitted at a rate and has a short-term Effects Screening Level (ESL) as stated in the following table; or

Emission Rate (lbs/hr)	Short-term ESL ($\mu\text{g}/\text{m}_3$)
≤ 0.04	≥ 2 & < 500
≤ 0.10	≥ 500 & $< 3,500$
≤ 0.40	$\geq 3,500$

- (2) It has a true vapor pressure at 68°F of less than 0.01 mm Hg.

- F. For all other new or increased air contaminants the following procedure shall be completed:
 - (1) Determine the emission rate (ER) of each air contaminant ingredient including emissions of the same air contaminant from currently authorized materials that may be emitted at the same time from each emission point.
 - (2) Multiply the emission rate of the air contaminant by the unit impact multiplier for each emission point from the following table to determine the off-property impact (Ground Level Concentration (GLC)) for each emission point.

Emission Point	Unit Impact ($\mu\text{g}/\text{m}_3$ per lb/hr)
EP3-1	415.37
EP3-2	56.87
EP3-3	57.54
FUG3-1	37.36
FUG3-2	57.59
FUG3-3	55.58

FUG3-4	55.87
--------	-------

- (3) Sum the impacts from each emission point/emission point group to determine a total off-property impact (Total GLC_{MAX}) for the new or increased air contaminant.
- (4) Compare the total off-property impact to the ESL for the air contaminant as follows: $Total\ GLC_{MAX} \leq ESL_{NEW}$

Where:

$Total\ GLC_{MAX}$ = the sum of the GLCs from each emission point.

ESL_{new} = short-term ESL of new ingredient air contaminant from the most current ESL list published by the TCEQ or as specifically derived by TCEQ Toxicology Section. The ESL shall be obtained in writing prior to the use of the new or increased air contaminant.

- G. Short-term emission rates from new or increased air contaminants shall not cause any increases in air contaminant category annual emission rates as listed on the maximum allowable emission rates table (MAERT).
- H. The permit holder shall maintain records of the information below and the demonstrations in steps A through C above. The following documentation is required for each compound:
 - (1) Chemical name(s), composition, and chemical abstract registry number if available.
 - (2) True vapor pressure at maximum hourly and annual average storage temperature.
 - (3) Molecular weight.
 - (4) Storage tanks, loading areas, and fugitive areas where the material is to be handled and the emission control device to be utilized.
 - (5) Date new compound handling commenced.
 - (6) Material Safety Data Sheet.
 - (7) Maximum concentration of the chemical in mole percent (or in weight percent for fugitive areas) in the affected facilities

From: Cara Hill <Cara.Hill@Tceq.Texas.Gov>
Sent: Monday, November 22, 2021 8:38 AM
To: Joerg Windolph <JWindolph@WAID.com>
Subject: FW: Project 331049 Permit 165848 Exfluor Research Corporation

Hi Joerg,

I wanted to let you know the modeling audit is complete and the modeling was approved. I've also attached a copy of the low balance letter. Do you know if the company plans to keep the project in the expedited program? We only have remainder of the condition negotiation and second public notice left to complete. We haven't gotten a response from the company regarding the low balance.

Thanks,
Cara

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From: Steve Sun <steve.sun@tceq.texas.gov>
Sent: Monday, November 22, 2021 7:51 AM
To: Cara Hill <Cara.Hill@Tceq.Texas.Gov>
Cc: Ahmed Omar <Ahmed.Omar@tceq.texas.gov>
Subject: RE: Project 331049 Permit 165848 Exfluor Research Corporation

Cara,

There is no technical contact listed on the project. I have not gotten a response from the RO when I sent the low balance letter. You may want to pass along to the technical contact.

Thanks.

Steve Sun
Technical Specialist
Air Permits Division
(512) 239-3554



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Brand, Martha

From: Steve Sun <steve.sun@tceq.texas.gov>
Sent: Monday, November 22, 2021 7:46 AM
To: BIRSCHENK_T@EXFLUOR.COM
Subject: Expedited Permitting Request
Attachments: Expedited Permitting request Permit 165848 - Project 331049.pdf

Dr. Bierschenk,

Thank you for your interest in the Texas Commission on Environmental Quality (TCEQ) Expedited Permitting Program. In response to your expedited permitting request, please review the attached letter.

Jon Niermann, *Chairman*
Emily Lindley, *Commissioner*
Bobby Janecka, *Commissioner*
Toby Baker, *Executive Director*



TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

Protecting Texas by Reducing and Preventing Pollution

November 22, 2021

DR THOMAS BIERSCHENK PHD
VICE PRESIDENT
EXFLUOR RESEARCH CORPORATION
2350 DOUBLE CREEK DR
ROUND ROCK TX 78664-3801

Re: Permit Number: 165848
Exfluor Research Corporation
Exfluor Research
Florence, Williamson County
Regulated Entity Number: RN110969227
Customer Reference Number: CN602696791

Dear Dr. Bierschenk:

On July 9, 2021, the Air Permits Division received your application for the above-referenced permit and your expedited permit surcharge in the amount of \$10,000.

As of the date of this letter, your expedited permit balance is zero. If you would like to continue in the expedited program, you will need to submit additional surcharge funds. Otherwise, APD will continue to process your application on a non-expedited basis.

If you have questions related to your expedited permit, you may call Mr. Steve Sun at (512) 239-3554.

Sincerely,

A handwritten signature in black ink, appearing to read "Samuel Short", with a long horizontal line extending to the right.

Samuel Short, Deputy Director
Air Permits Division
Office of Air

Project Number: 331049

From: Joerg Windolph <JWindolph@WAID.com>
Sent: Monday, January 24, 2022 11:32 AM
To: Cara Hill
Cc: arloe.fontenot@exfluor.com
Subject: RE: Exfuor Permit No. 165848 Application

No problem. We will review and get back to you.

Thank you,

Joerg Windolph, P.E.
Principal Engineer

Waid Environmental

13785 Research Blvd., Suite 100

Austin, Texas 78750

Office: 512-255-9999

Cell: 512-550-8147

<http://www.waid.com>

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From: Cara Hill <Cara.Hill@Tceq.Texas.Gov>
Sent: Monday, January 24, 2022 11:23 AM
To: Joerg Windolph <JWindolph@WAID.com>
Cc: arloe.fontenot@exfluor.com
Subject: RE: Exfuor Permit No. 165848 Application

Hi Joerg,

I thought I had sent them on the 13th. I've attached the revised draft. Sorry about that!

Thanks,
Cara

How is our customer service? www.tceq.texas.gov/customersurvey

From: Joerg Windolph <JWindolph@WAID.com>
Sent: Monday, January 24, 2022 10:55 AM
To: Cara Hill <Cara.Hill@Tceq.Texas.Gov>
Cc: arloe.fontenot@exfluor.com
Subject: RE: Exfuor Permit No. 165848 Application

Cara,

I have not heard from in a while. Is everything okay?

Could you please give us another update on your progress?

Thank you,

Joerg Windolph, P.E.
Principal Engineer

Waid Environmental

13785 Research Blvd., Suite 100

Austin, Texas 78750

Office: 512-255-9999

Cell: 512-550-8147

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From: Cara Hill <Cara.Hill@Tceq.Texas.Gov>

Sent: Thursday, January 13, 2022 7:59 AM

To: Joerg Windolph <JWindolph@WAID.com>

Cc: arloe.fontenot@exfluor.com

Subject: RE: Exfuor Permit No. 165848 Application

Hi Joerg,

I should have the updated conditions back to you all today. If you have further comments, we can set up a call to go through the conditions so we can get it wrapped up to go to notice.

Thanks,

Cara

How is our customer service? www.tceq.texas.gov/customersurvey

From: Joerg Windolph <JWindolph@WAID.com>

Sent: Wednesday, January 12, 2022 7:55 AM

To: Cara Hill <Cara.Hill@Tceq.Texas.Gov>

Cc: arloe.fontenot@exfluor.com

Subject: Exfuor Permit No. 165848 Application

Cara,

Can you please give us an update on where you are on your permit review for Exfluor's Permit No. 165848? Are you waiting on anything from us? Is there anything that we can do to help you? Please let us know.

Thank you,

Joerg Windolph, P.E.
Principal Engineer

Waid Environmental

13785 Research Blvd., Suite 100

Austin, Texas 78750

Office: 512-255-9999

Cell: 512-550-8147

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From: Joerg Windolph <JWindolph@WAID.com>
Sent: Thursday, January 13, 2022 8:51 AM
To: Cara Hill
Subject: RE: Exfluor Permit No. 165848 Application

That sounds great. Thank you Cara.

Joerg Windolph, P.E.
Principal Engineer

Waid Environmental

13785 Research Blvd., Suite 100
Austin, Texas 78750
Office: 512-255-9999
Cell: 512-550-8147

<http://www.waid.com>

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Cc: arloe.fontenot@exfluor.com
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Can you please give us an update on where you are on your permit review for Exfluor's Permit No. 165848? Are you waiting on anything from us? Is there anything that we can do to help you? Please let us know.

Thank you,

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From: Joerg Windolph <JWindolph@WAID.com>
Sent: Wednesday, February 9, 2022 8:27 AM
To: Cara Hill
Cc: arloe.fontenot@exfluor.com
Subject: RE: Exfluor Permit No. 165848 Application
Attachments: Proposed Flexibiity Condition.docx

Cara,

On behalf of Exfluor Research Corporation, I want to let you know that we are accepting the draft conditions and MAERT for Permit No. 165848 that you emailed to us on January 24, 2022. Exfluor would like to have just one addition to the draft conditions. As requested in our initial response to the draft conditions dated November 30, 2021, Exfluor would like to include a permit condition that would allow for chemical flexibility. Please see the attached proposed chemical flexibility condition. If this addition can be made, Exfluor is ready to proceed to the 2nd public notice. Please let us know if you have additional questions or comments.

Thank you,

Joerg Windolph, P.E.
Principal Engineer

Waid Environmental

13785 Research Blvd., Suite 100
Austin, Texas 78750
Office: 512-255-9999
Cell: 512-550-8147

<http://www.waid.com>

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To: Joerg Windolph <JWindolph@WAID.com>
Cc: arloe.fontenot@exfluor.com
Subject: RE: Exfluor Permit No. 165848 Application

Hi Joerg,

I thought I had sent them on the 13th. I've attached the revised draft. Sorry about that!

Thanks,
Cara

How is our customer service? www.tceq.texas.gov/customersurvey

From: Joerg Windolph <JWindolph@WAID.com>
Sent: Monday, January 24, 2022 10:55 AM
To: Cara Hill <Cara.Hill@Tceq.Texas.Gov>
Cc: arloe.fontenot@exfluor.com
Subject: RE: Exfuor Permit No. 165848 Application

Cara,

I have not heard from in a while. Is everything okay?

Could you please give us another update on your progress?

Thank you,

Joerg Windolph, P.E.
Principal Engineer
Waid Environmental
13785 Research Blvd., Suite 100
Austin, Texas 78750
Office: 512-255-9999
Cell: 512-550-8147
<http://www.waid.com>

Privilege and Confidentiality Notice

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From: Cara Hill <Cara.Hill@Tceq.Texas.Gov>
Sent: Thursday, January 13, 2022 7:59 AM
To: Joerg Windolph <JWindolph@WAID.com>
Cc: arloe.fontenot@exfluor.com
Subject: RE: Exfuor Permit No. 165848 Application

Hi Joerg,

I should have the updated conditions back to you all today. If you have further comments, we can set up a call to go through the conditions so we can get it wrapped up to go to notice.

Thanks,
Cara

How is our customer service? www.tceq.texas.gov/customersurvey

From: Joerg Windolph <JWindolph@WAID.com>
Sent: Wednesday, January 12, 2022 7:55 AM
To: Cara Hill <Cara.Hill@Tceq.Texas.Gov>
Cc: arloe.fontenot@exfluor.com
Subject: Exfuor Permit No. 165848 Application

Cara,

Can you please give us an update on where you are on your permit review for Exfluor's Permit No. 165848? Are you waiting on anything from us? Is there anything that we can do to help you? Please let us know.

Thank you,

Joerg Windolph, P.E.
Principal Engineer

Waid Environmental

13785 Research Blvd., Suite 100

Austin, Texas 78750

Office: 512-255-9999

Cell: 512-550-8147

<http://www.waid.com>

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This email has been scanned for spam and viruses by Proofpoint Essentials. Click [here](#) to report this email as spam.

This email has been scanned for spam and viruses by Proofpoint Essentials. Click [here](#) to report this email as spam.

Thanks,
Cara Hill
TCEQ Air Permits
512-239-5123

How is our customer service? www.tceq.texas.gov/customersurvey

Special Conditions

OPERATIONAL FLEXIBILITY

1. Except as provided for below, the use of compounds at the Exflur Research Corporation facility is limited to those identified in the permit application, PI-1 dated, July 7, 2021 (including subsequent submittals made during the permit application review process). New compounds may be added through the use of the procedure below, 30 TAC Chapter 106, or 30 TAC Chapter 116.
 - A. Short-term (pounds per hour [lb/hr]) and annual (TPY) emissions and calculations shall be completed for each chemical at each affected source. Emission rates (ER) shall be calculated with the methods documented in the permit application PI-1 dated, July 7, 2021. The calculated ER shall not exceed the maximum allowable emissions rate at any emission point.
 - B. The Effect Screening Level (ESL) for the compound shall be obtained from the current TCEQ ESL list or by written request to the TCEQ Toxicology Section.
 - C. The new compounds or chemicals shall serve the same basic function and the emissions shall be from the same location as the emissions from the current materials.
 - D. All the compounds within a new mixture are known, i.e. the weight percentages of the ingredients add to 100 percent or more.
 - E. Any air contaminant compound in a new mixture is exempt from the requirements of subparagraph F. below if it meets one of the following conditions:

- (1) It is emitted at a rate and has a short-term Effects Screening Level (ESL) as stated in the following table; or

Emission Rate (lbs/hr)	Short-term ESL ($\mu\text{g}/\text{m}_3$)
≤ 0.04	≥ 2 & < 500
≤ 0.10	≥ 500 & $< 3,500$
≤ 0.40	$\geq 3,500$

- (2) It has a true vapor pressure at 68°F of less than 0.01 mm Hg.

- F. For all other new or increased air contaminants the following procedure shall be completed:
 - (1) Determine the emission rate (ER) of each air contaminant ingredient including emissions of the same air contaminant from currently authorized materials that may be emitted at the same time from each emission point.
 - (2) Multiply the emission rate of the air contaminant by the unit impact multiplier for each emission point from the following table to determine the off-property impact (Ground Level Concentration (GLC)) for each emission point.

Emission Point	Unit Impact ($\mu\text{g}/\text{m}_3$ per lb/hr)
EP3-1	415.37
EP3-2	56.87
EP3-3	57.54
FUG3-1	37.36
FUG3-2	57.59
FUG3-3	55.58

FUG3-4	55.87
--------	-------

- (3) Sum the impacts from each emission point/emission point group to determine a total off- property impact (Total GLC_{MAX}) for the new or increased air contaminant.
- (4) Compare the total off-property impact to the ESL for the air contaminant as follows: $Total\ GLC_{MAX} \leq ESL_{NEW}$

Where:

Total GLC_{MAX} = the sum of the GLCs from each emission point.

ESL_{new} = short-term ESL of new ingredient air contaminant from the most current ESL list published by the TCEQ or as specifically derived by TCEQ Toxicology Section. The ESL shall be obtained in writing prior to the use of the new or increased air contaminant.

- G. Short-term emission rates from new or increased air contaminants shall not cause any increases in air contaminant category annual emission rates as listed on the maximum allowable emission rates table (MAERT).
- H. The permit holder shall maintain records of the information below and the demonstrations in steps A through C above. The following documentation is required for each compound:
 - (1) Chemical name(s), composition, and chemical abstract registry number if available.
 - (2) True vapor pressure at maximum hourly and annual average storage temperature.
 - (3) Molecular weight.
 - (4) Storage tanks, loading areas, and fugitive areas where the material is to be handled and the emission control device to be utilized.
 - (5) Date new compound handling commenced.
 - (6) Material Safety Data Sheet.
 - (7) Maximum concentration of the chemical in mole percent (or in weight percent for fugitive areas) in the affected facilities

Application Exhibit 14

Legislative Letter

Senate Bill 709 (84th Texas Legislative Session, 2015) amended the Texas Water Code by adding new Section 5.5553, which requires the Texas Commission on Environmental Quality (TCEQ) to provide written notice to you at least thirty (30) days prior to the TCEQ's issuance of draft permits for applications that are located in your district.

Exfluor Research Corporation has applied to the TCEQ for air quality permitting actions regarding a Exfluor Research.

Application Received Date: July 9, 2021

Location: 1100 County Road 236, Florence, Williamson County, Texas, 76527

This link to an electronic map of the site or facility's general location is provided as a public courtesy and not part of the application or notice:

<http://www.tceq.texas.gov/assets/public/hb610/index.html?lat=30.791111&lng=-97.904166&zoom=13&type=r>.

Air Quality Permits affected:

- *Air Quality Permit 165848*

You were previously sent notification for this application, but the draft permit was delayed.

TCEQ is preparing the initial draft permit for applicant review. At the time the draft permit is issued, the applicant will be required to publish notice in a newspaper of general circulation, and the TCEQ will provide a copy of the notice of draft permit to persons who have requested to be on a mailing list.

Questions regarding this email may be directed to Bonnie Evridge by calling 512-239-5222.

Issued: February 17, 2022

From: eNotice TCEQ
Sent: Thursday, February 17, 2022 12:48 PM
To: Charles.schwertner@senate.texas.gov; Terry.wilson@house.texas.gov;
james.talarico@house.texas.gov; john.bucy@house.texas.gov
Subject: TCEQ Notice - Williamson, Exflur Research Corporation, RN110969227,
331049
Attachments: TCEQ Notice - Permit 165848.pdf

This email electronically transmits an official document issued by the Air Permits Division of the Texas Commission on Environmental Quality.

You have received this email because either (a) you filed a document with the Office of the Chief Clerk that placed you on the official mailing list for the above referenced matter, or (b) notice to you is legally required. As authorized by Texas Water Code Section 5.128, this electronic transmittal is replacing the previous practice of hard copy distribution. Amendments to Texas Government Code Section 552.137 prompted a change to the agency's privacy policy regarding confidentiality of certain email addresses. The revised privacy policy can be viewed at https://www.tceq.texas.gov/help/policies/electronic_info_policy.html

The attached document is provided in an Adobe Acrobat .pdf format. If you cannot display the attachment, you may need to visit the Adobe web site (<http://get.adobe.com/reader>) to download the free Adobe Acrobat Reader software.

Application Exhibit 15

TCEQ ED – Notice of Application and Preliminary Decision for an Air Quality Permit (NAPD) Public Notice Documents, Including the Draft Permit

Jon Njermann, *Chairman*
 Emily Lindley, *Commissioner*
 Bobby Janecka, *Commissioner*
 Toby Baker, *Executive Director*



TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

Protecting Texas by Reducing and Preventing Pollution

February 23, 2022

DR THOMAS BIERSCHENK PHD
 VICE PRESIDENT
 EXFLUOR RESEARCH CORPORATION
 2350 DOUBLE CREEK DR
 ROUND ROCK TX 78664-3801

Re: Permit Application
 Permit Number: 165848
 Exflur Research Corporation
 Exflur Research
 Florence, Williamson County
 Regulated Entity Number: RN110969227
 Customer Reference Number: CN602696791

Dear Dr. Bierschenk:

The Texas Commission on Environmental Quality (TCEQ) has completed the technical review of your application and has prepared a preliminary decision and draft permit.

You are now required to publish notice of your proposed activity. To help you meet the regulatory requirements associated with this notice, we have included the following items:

- Notices for Newspaper Publication (Examples A and B)
- Public Notice Checklist
- Instructions for Public Notice
- Affidavit of Publication for Air Permitting (Form TCEQ-20533) and Alternative Language Affidavit of Publication for Air Permitting (Form TCEQ-20534)
- Web link to download Public Notice Verification Form (refer to Public Notice Instructions)
- Notification List
- Draft Permit

Please note that it is **very important** that you follow **all** directions in the enclosed instructions. If you do not, you may be required to republish the notice. A common mistake is the unauthorized changing of notice wording or font. If you have any questions, please contact us before you proceed with publication.

A "Public Notice Checklist" is enclosed which notes the time limitations for each step of the public notice process. **The processing of your application may be delayed if these time limitations are not met (i.e.; submitting proof of publication of the notice within 10 business days after publication, affidavits of publication within 30 calendar days after the date of publication, and public notice verification form within 10 business days after the end of the designated comment period).** This checklist should be used as a tool in conjunction with the enclosed, detailed instructions.

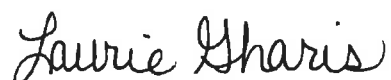
If you do not comply with **all** requirements described in the instructions, further processing of your application may be suspended or the agency may take other actions.

Dr. Thomas Bierschenk, PhD
Page 2
February 23, 2022

Re: Permit: 165848

If you have any questions regarding publication requirements, please contact the Office of the Chief Clerk at (512) 239-3300. If you have any other questions, please contact Ms. Cara Hill at (512) 239-5123.

Sincerely,



Laurie Gharis
Chief Clerk
Office of the Chief Clerk
Texas Commission on Environmental Quality

Enclosure

cc: Air Section Manager, Region 11 - Austin
Air Permits Section Chief, New Source Review Section (6MM-AP), U.S. Environmental Protection Agency, Region 6, Dallas

Project Number: 331049

TEXAS COMMISSION ON ENVIRONMENTAL QUALITY



EXAMPLE A

NOTICE OF APPLICATION AND PRELIMINARY DECISION FOR AN AIR QUALITY PERMIT

PROPOSED PERMIT NUMBER: 165848

APPLICATION AND PRELIMINARY DECISION. Exflur Research Corporation has applied to the Texas Commission on Environmental Quality (TCEQ) for issuance of Proposed Air Quality Permit Number 165848, which would authorize construction of the Exflur Research facility located at 1100 County Road 236, Florence, Williamson County, Texas 76527. This application was processed in an expedited manner, as allowed by the commission's rules in 30 Texas Administrative Code, Chapter 101, Subchapter J. This application was submitted to the TCEQ on July 9, 2021. The proposed facility will emit the following contaminants: hydrogen fluorides, carbon monoxide, hazardous air pollutants, nitrogen oxides and organic compounds.

The executive director has completed the technical review of the application and prepared a draft permit which, if approved, would establish the conditions under which the facility must operate. The executive director has made a preliminary decision to issue the permit because it meets all rules and regulations. The permit application, executive director's preliminary decision, and draft permit will be available for viewing and copying at the TCEQ central office, the TCEQ Austin regional office, and at the Eula Hunt Beck Florence Public Library, 207 East Main Street, Williamson County, Texas beginning the first day of publication of this notice. The facility's compliance file, if any exists, is available for public review at the TCEQ Austin Regional Office, 12100 Park 35 Circle Building A Room 179, Austin, Texas.

PUBLIC COMMENT/PUBLIC MEETING. You may submit public comments or request a public meeting about this application. The purpose of a public meeting is to provide the opportunity to submit comment or to ask questions about the application. The TCEQ will hold a public meeting if the executive director determines that there is a significant degree of public interest in the application or if requested by a local legislator. A public meeting is not a contested case hearing. **You may submit additional written public comments within 30 days of the date of newspaper publication of this notice in the manner set forth in the AGENCY CONTACTS AND INFORMATION paragraph below.**

RESPONSE TO COMMENTS AND EXECUTIVE DIRECTOR ACTION. After the deadline for public comments, the executive director will consider the comments and prepare a response to all relevant and material or significant public comments. Because no timely hearing requests have been received, after preparing the response to comments, the executive director may then issue final approval of the application. **The response to comments, along with the executive director's decision on the application will be mailed to everyone who submitted public comments or is on a mailing list for this application, and will be posted electronically to the Commissioners' Integrated Database (CID).**

INFORMATION AVAILABLE ONLINE. When they become available, the executive director's response to comments and the final decision on this application will be accessible through the Commission's Web site at www.tceq.texas.gov/goto/cid. Once you have access to the CID using the above link, enter the permit number for this application which is provided at the top of this notice. This link to an electronic map of the site or facility's general location is provided as a public courtesy and not part of the application or notice. For exact location, refer to application. <http://www.tceq.texas.gov/assets/public/hb610/index.html?lat=30.791111&lng=-97.904166&zoom=13&type=r>.

MAILING LIST. You may ask to be placed on a mailing list to obtain additional information on this application by sending a request to the Office of the Chief Clerk at the address below.

AGENCY CONTACTS AND INFORMATION. Public comments and requests must be submitted either electronically at www14.tceq.texas.gov/epic/eComment/, or in writing to the Texas Commission on Environmental Quality, Office of the Chief Clerk, MC-105, P.O. Box 13087, Austin, Texas 78711-3087. Please be aware that any contact information you provide, including your name, phone number, email address and physical address will become part of the agency's public record. For more information about this permit application or the permitting process, please call the Public Education Program toll free at 1-800-687-4040. Si desea información en Español, puede llamar al 1-800-687-4040.

Further information may also be obtained from Exflor Research Corporation at the address stated above or by calling Dr. Thomas Bierschenk, PhD, Vice President at (512) 310-9044.

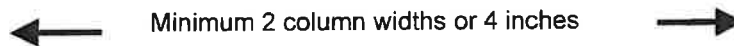
Notice Issuance Date: February 23, 2022

Example B

Publication Elsewhere in the Newspaper:

TO ALL INTERESTED PERSONS AND PARTIES:

Exfluor Research Corporation, has applied to the Texas Commission on Environmental Quality (TCEQ) for issuance of Proposed Air Quality Permit Number 165848, which would authorize construction of the Exfluor Research facility located at 1100 County Road 236, Florence, Williamson County, Texas 76527. This application was processed in an expedited manner, as allowed by the commission's rules in 30 Texas Administrative Code, Chapter 101, Subchapter J. Additional information concerning this application is contained in the public notice section of this newspaper.



Public Notice Checklist
Notice of Application and Preliminary Decision for an Air Quality Permit
(2nd Notice)

The following tasks must be completed for public notice. If publication in an alternative language is required, please complete the tasks for both the English and alternative language publications. Detailed instructions are included in the "Instructions for Public Notice" section of this package.

Within 33 calendar days after date of this letter
<p>Publish <i>Notice of Application and Preliminary Decision for an Air Quality Permit</i> in the same newspaper(s) in which you published <i>Notice of Receipt of Intent to Obtain Permit</i> for this application.</p> <ul style="list-style-type: none"> - Example A must be published in "public notice" section of newspaper. Review for accuracy prior to publishing. - Example B (if applicable) must be published in prominent location (other than "public notice") in same issue of newspaper - As part of the expedited permitting process, it is recommended that you publish immediately. <p>Provide copy of the complete application (including any subsequent revisions) and the executive director's preliminary decision (including the draft permit) at a public place for review and copying. Keep them there for duration of the designated comment period.</p>
First day of newspaper publication
<p>Review published newspaper notice for accuracy. If errors, contact Air Permits Division.</p> <p>Ensure copy of the complete application (including any subsequent revisions) and the executive director's preliminary decision (including the draft permit) are at the public place.</p> <p>It is recommended that the signs from the first notice be in place and the lettering must remain legible and visible until 30 days after publication of the <i>Notice of Application and Preliminary Decision</i> (either English or alternative language notice, whichever is later).</p>
Within 10 business days after date of publication
<p>Proof of publication showing publication date and newspaper name should be emailed to PROOFS@tceq.texas.gov or mailed to:</p> <p style="padding-left: 40px;">Texas Commission on Environmental Quality Office of the Chief Clerk, MC-105 Attn: Notice Team / AIR Expedited Permitting P.O. Box 13087 Austin, Texas 78711-3087</p> <p>Mail or email, as instructed, photocopies of newspaper clippings showing publication date and newspaper name to persons listed on <i>Notification List</i>.</p>
Within 30 calendar days after date of publication
<p>Affidavit of publication for air permitting and alternative language affidavit of publication for air permitting (if applicable) should be emailed to PROOFS@tceq.texas.gov or mailed to:</p> <p style="padding-left: 40px;">Texas Commission on Environmental Quality Office of the Chief Clerk, MC-105 Attn: Notice Team / AIR Expedited Permitting P.O. Box 13087 Austin, Texas 78711-3087</p> <p>Mail or email, as instructed, photocopies of affidavits to persons listed on <i>Notification List</i>.</p>
Within 10 business days after end of the designated comment period
<p>Public Notice Verification Form should be emailed to PROOFS@tceq.texas.gov or mailed to:</p> <p style="padding-left: 40px;">Texas Commission on Environmental Quality Office of the Chief Clerk, MC-105 Attn: Notice Team / AIR Expedited Permitting P.O. Box 13087 Austin, Texas 78711-3087</p> <p>Mail or email, as instructed, photocopies of Public Notice Verification Form to persons listed on <i>Notification List</i>.</p>

TEXAS COMMISSION ON ENVIRONMENTAL QUALITY



Instructions for Public Notice For New Source Review Air Permit

Notice of Application and Preliminary Decision

We have completed the technical review of your application and issued a preliminary decision. You must comply with the following instructions:

Review Notice

Included in the notice is all of the information which the commission believes is necessary to effectuate compliance with applicable public notice requirements. Please read it carefully and notify the Texas Commission on Environmental Quality (TCEQ) immediately if it contains any errors or omissions. You are responsible for ensuring the accuracy of all information published. You may not change the text of the notice without prior approval from the TCEQ.

Newspaper Notice

- You must publish the enclosed *Notice of Application and Preliminary Decision for an Air Quality Permit* within **33 calendar days** after the date this information was mailed to you (see date of letter). As part of the expedited permitting process, it is recommended that you publish immediately.
- You must publish the enclosed *Notice of Application and Preliminary Decision for an Air Quality Permit* at your expense, in the same newspaper(s) in which you published the *Notice of Receipt and Intent to Obtain Permit* for this application. The newspaper must be a newspaper that is of general circulation in the municipality where the facility is or will be located. If the facility is not located within a municipality, the newspaper must be of general circulation in the municipality nearest the location.
- You must publish this notice in one issue of any applicable newspaper.
- You will find two example notices enclosed in this package. *Example A* must be published in the "public notice" section of the newspaper. The phrase "Example A" is not required to be published. *Example B* must be published in the **same issue** of the newspaper as *Example A*; however, it must be published in a prominent location (other than the public notice section). *Example B* refers the public to the "public notice" section of the newspaper where *Example A* provides more information regarding the permit application.
- *Example B* must be a total of at least **6 column inches (standard advertising units)** with a height of at least **3 inches** and a horizontal dimension of **2 column widths**. If the newspaper chosen does not use standard advertising units for measurement, the notice must be at least **12 square inches** with the shortest side of at least **3 inches**.
- The bold text of the enclosed notice **must** be printed in the newspaper in a font style or size that distinguishes it from the rest of the notice (i.e., **bold, italics**). **Failure to do so may require re-notice.**

Alternative Language Notice

In certain circumstances, applicants for air permits must complete notice in alternative languages.

- Public notice rules require the applicant to determine whether a bilingual program is required at either the elementary or middle school nearest to the facility or proposed facility location. Bilingual education programs are determined on a district-wide basis. When students who are required to attend either school are eligible to be enrolled in a bilingual education program, some alternative language notice is required (newspaper notice).
- Since the school district, and not the schools, must provide the bilingual education program, these programs do not have to be located at the elementary or middle school nearest to the facility or proposed facility to trigger the alternative language notice requirement. If there are students who would normally attend the nearest schools eligible to be taught in a bilingual education program at a different location, alternative language notice is required.
- If triggered, publications of alternative language notices must be made in a newspaper or publication printed primarily in each language taught in the bilingual education program. The same newspaper(s) used for *Notice of Receipt and Intent to Obtain Permit* must be used for publication of the *Notice of Application and Preliminary Decision for an Air Quality Permit*. This notice is required if such a newspaper or publication exists in the municipality or the county where the facility is or will be located.
- The applicant must demonstrate a good faith effort to identify a newspaper or publication in the required language. If a newspaper or publication of general circulation published at least once a month in such language cannot be found, publishing in that language is not required, but signs must remain posted in the same location(s) utilized during the *Notice of Receipt of Intent to Obtain Permit (1st public notice)*.
- Publication in an alternative language section or insertion within an English language newspaper does not satisfy these requirements.
- The applicant has the burden to demonstrate compliance with these requirements. You must fill out the **Public Notice Verification Form (Form TCEQ-20244)** indicating your compliance with the requirements regarding publication in an alternative language. **This form is available at www.tceq.texas.gov/permitting/air/nav/air_publicnotice.html.**
- It is suggested the applicant work with the local school district to do the following:
 - (a) determine if a bilingual program is required in the district;
 - (b) determine which language is required by the bilingual program;
 - (c) locate the nearest elementary and middle schools; and
 - (d) determine if any students attending either school are entitled to be enrolled in a bilingual educational program.
- **If you determine that you must meet the alternative language notice requirements, you are responsible for ensuring that the publication in the alternative language is complete and accurate in that language.** Since the most common bilingual programs are in Spanish, the TCEQ has provided example Spanish notice templates for your use. All italic notes should be replaced with the corresponding Spanish translations for the specific application and published in the alternative language publication. Electronic versions of the Spanish templates are available through the Air Permits Division Web site at www.tceq.texas.gov/goto/air/publicnotice.
- If you are required to publish notice in a language other than Spanish, you must translate the entire public notice at your own expense.

Public Comment Period

- The public comment period will last at least **30 calendar days after publication of the last notice**.
- The comment period will be longer if the last day of the public comment period ends on a weekend or a holiday. In this case, the comment period will end on the next business day.
- The comment period for the permit may lengthen depending on whether a public meeting is held. If a public meeting is held, the comment period will be extended to the later of either the date of the public meeting or the end of the second notice period.

Proof of Publication

- Check each publication to ensure that the articles were accurately published. If a notice was not published correctly you may be required to republish.
- For each newspaper in which you published, you must submit proof of publication that shows the notice, the date of publication, and the name of the newspaper to the Office of the Chief Clerk within **10 business days** after the date of publication. Acceptable proofs of publication are 1) copies of the published notice or 2) the newspaper clippings of the published notice. If you choose to submit copies of the published notice to the Office of the Chief Clerk, copies must be on standard-size 8½" x 11" paper and must show the actual size of the published notice (do not reduce the image when making copies). Published notices longer than 11" must be copied onto multiple 8½" x 11" pages. Please note, submitting a copy of your published notice could result in faster processing of your application. It is recommended that you maintain newspaper clippings or tear sheets of the notice for your records.
- You must submit an **affidavit of publication for air permitting and alternate language affidavit of publication for air permitting (if applicable)** to the Office of the Chief Clerk within **30 calendar days** after the date of publication. **You must use the enclosed affidavit forms.** The affidavits must clearly identify the applicant's name and permit number. You are encouraged to submit the affidavit with the proof of publication described above.
- You must submit the **Public Notice Verification Form (Form TCEQ-20244)** to the Office of the Chief Clerk within **10 business days** of the end of this public comment period. You must use this form to certify that you have met bilingual notice requirements. **This form is available at www.tceq.texas.gov/permitting/air/nav/air_publicnotice.html.**
- The **affidavits of publication, Public Notice Verification Form, and acceptable proof of publication of the published notices** should be emailed to PROOFS@tceq.texas.gov or mailed to:

Texas Commission on Environmental Quality
Office of the Chief Clerk, MC-105
Attn: Notice Team / AIR Expedited Permitting
P.O. Box 13087
Austin, Texas 78711-3087

- Please ensure that the affidavit(s) you send to the Chief Clerk have all blanks filled in correctly.
- Photocopies of newspaper clippings, affidavits, and verifications must also be sent to those listed on the enclosed *Notification List* within the deadlines specified above.

Failure to Publish and Submit Proof of Publication

You must meet all publication requirements. **If you fail to publish the notice or submit proof of publication on time**, the TCEQ may suspend further processing on your application or take other actions.

Sign Posting

It is recommended that the signs that were put in place prior to publication of the first notice remain in place and be legible and visible until 30 days after publication of the *Notice of Application and Preliminary Decision* (either English or alternative language notice, whichever is later).

Application in a Public Place

- You must provide a copy of the complete application (including any subsequent revisions) and the executive director's preliminary decision (including the draft permit), at a public place for review and copying by the public. This place must be in the county in which the facility is located or proposed to be located.
- A public place is one that is publicly owned or operated (ex: libraries, county courthouses, or city halls.)
- This copy must be accessible to the public for review and copying. The copy must be available beginning on the first day of newspaper publication and remain in place until the commission has taken action on the application or the commission refers issues to the State Office of Administrative Hearings.
- If the application is submitted to the TCEQ with information marked as "CONFIDENTIAL," you are required to indicate which specific portions of the application are not being made available to the public. These portions of the application must be accompanied with the following statement: "Any request for portions of this application that are marked as confidential must be submitted in writing, pursuant to the Public Information Act, to the Texas Commission on Environmental Quality, Public Information Coordinator, MC-197, P.O. Box 13087, Austin, Texas 78711-3087."
- You must submit verification of file availability using the ***Public Notice Verification Form (Form TCEQ-20244)*** within **10 business days** after end of the publications' designated comment period. Do not submit the form verifying that the application was in a public place until after the comment period is complete. If a public meeting is held or second notice is required causing the public comment period to be extended, at a later date you will be required to verify that the application was in a public place during the entire public comment period. **This form is available at www.tceq.texas.gov/permitting/air/nav/air_publicnotice.html.**

General Information

When contacting the Commission regarding this application, please refer to the permit number at the top of the *Notice of Application and Preliminary Decision*.

If you have questions or need assistance regarding publication requirements, please contact the Office of the Chief Clerk at (512) 239-3300 or the project reviewer listed in the cover letter.

TCEQ-Office of the Chief Clerk
MC-105 Attn: Notice Team
P.O. Box 13087
Austin, Texas 78711-3087

Applicant Name: Exflor Research Corporation
Permit No.: 165848
Application Received Date: July 9, 2021

AFFIDAVIT OF PUBLICATION FOR AIR PERMITTING

STATE OF TEXAS §
COUNTY OF _____ §

BEFORE ME, the undersigned authority, on this day personally appeared

_____, who being by me duly sworn, deposes and says that (s)he is (*Name of Person Representing Newspaper*)

the _____ of the _____
(*Title of Person Representing Newspaper*) (*Name of the Newspaper*)

that said newspaper is generally circulated in _____, Texas;
(*The municipality or nearest municipality to the location of the facility or the proposed facility*)

that the enclosed notice was published in said newspaper on the following date(s):

(*Newspaper Representative's Signature*)

Subscribed and sworn to before me this the _____ day of _____, 20____
to certify which witness my hand and seal of office.

Notary Public in and for the State of Texas

[Affix Seal]

Print or Type Name of Notary Public

My Commission Expires

TCEQ-Office of the Chief Clerk
MC-105 Attn: Notice Team
P.O. Box 13087
Austin, Texas 78711-3087

Applicant Name: Exflur Research Corporation
Permit No.: 165848
Application Received Date: July 9, 2021

ALTERNATIVE LANGUAGE AFFIDAVIT OF PUBLICATION FOR AIR PERMITTING

STATE OF TEXAS §

COUNTY OF _____ §

BEFORE ME, the undersigned authority, on this day personally appeared

_____, who being by me duly sworn, deposes and says that (s)he is (*Name of Person Representing Newspaper*)

the _____ of the _____;
(*Title of Person Representing Newspaper*) (*Name of the Newspaper*)

that said newspaper is generally circulated in _____, Texas;
(*The municipality or county in which the facility or proposed facility is located*)

that the enclosed notice was published in said newspaper on the following date(s):

(*Newspaper Representative's Signature*)

Subscribe and sworn to before me this the _____ day of _____, 20____
to certify which witness my hand and seal of office.

[Affix Seal]

Notary Public in and for the State of Texas

Print or Type Name of Notary Public

My Commission Expires

Notification List

It is the responsibility of the applicant to furnish the following offices with copies of the notices published, the *Affidavit of Publication for Air Permitting*, the *Alternative Language Affidavit of Publication for Air Permitting (if applicable)*, and a completed copy of the *Public Notice Verification Form (Form TCEQ-20244)*. Acceptable proof of publication and any affidavits and Form TCEQ-20244 should be emailed to PROOFS@tceq.texas.gov or mailed to the Texas Commission on Environmental Quality, Office of the Chief Clerk, MC-105, AIR Expedited Permitting, P.O. Box 13087, Austin, Texas 78711-3087.

Electronic copies should be submitted via email to the U.S. Environmental Protection Agency (EPA), **Region 6** at R6AirPermitsTX@EPA.gov. Please contact Ms. Aimee Wilson (wilson.aimee@epa.gov) at (214) 665-7596 if you have any questions pertaining to electronic submittals to the EPA.

Email copies to Ms. Ariel Ramirez at Ariel.Ramirez@tceq.texas.gov

Hard copies should be sent to the following:

Texas Commission on Environmental Quality
Austin Regional Office
12100 Park 35 Circle Bldg A Rm 179
Austin, Texas 78753-1808

Jon Niermann, *Chairman*
Emily Lindley, *Commissioner*
Bobby Janecka, *Commissioner*
Toby Baker, *Executive Director*



TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

Protecting Texas by Reducing and Preventing Pollution

February 23, 2022

DR THOMAS BIERSCHENK PHD
VICE PRESIDENT
EXFLUOR RESEARCH CORPORATION
2350 DOUBLE CREEK DR
ROUND ROCK TX 78664-3801

Re: Permit Application
Permit Number: 165848
Exflor Research Corporation
Exflor Research
Florence, Williamson County
Regulated Entity Number: RN110969227
Customer Reference Number: CN602696791

Dear Dr. Bierschenk:

The Texas Commission on Environmental Quality (TCEQ) has made a preliminary decision on the above-referenced application. In accordance with Title 30 Texas Administrative Code § 39.419(b), you are now required to publish Notice of Application and Preliminary Decision. You must provide a copy of this preliminary decision letter with the draft permit at the public place referenced in the public notice.

If you have any questions, please call Ms. Cara Hill at (512) 239-5123 or write to the TCEQ, Office of Air, Air Permits Division, MC-163, P.O. Box 13087, Austin, Texas 78711-3087.

Sincerely,

A handwritten signature in cursive script that reads "Bonnie Evridge".

Bonnie Evridge, Manager
Mechanical/Coatings New Source Review Permits Section
Air Permits Division

Enclosure

cc: Air Section Manager, Region 11 - Austin

Project Number: 331049

Special Conditions

Permit Number 165848

1. This permit covers only those sources of emissions listed in the attached table entitled "Emission Sources - Maximum Allowable Emission Rates" (MAERT), and those sources are limited to the emission limits and other conditions specified in that table.
2. Non-fugitive emissions from relief valves, safety valves, or rupture discs of gases containing volatile organic compounds (VOC) at a concentration of greater than 1 percent are not authorized by this permit unless authorized on the MAERT. Any releases directly to atmosphere from relief valves, safety valves, or rupture discs of gases containing VOC at a concentration greater than 1 weight percent are not consistent with good practice for minimizing emissions.

Emission Standards and Operational Specifications

3. The process vents from the Fluorine Generators, Fluorination Reactors, Thermal Cracking Reactors, Distillation Units, Polishing Reactors, Reduction Reactors, Hydrolysis Reactors, Methanolysis Reactors, Bromination Reactors, Extraction Tank, Anhydride Flasks, Acrylate Flasks, and Drying Flask shall be routed to the Exhaust Gas Vent System (EPN EP3-1).
4. Annual production shall not the rates listed in the Table 2 Material Balance submitted with application form PI-1 dated July 9, 2021. Production records shall be updated monthly with the rates of each product produced during the previous month and rolling 12 months to date.
5. The thermal oxidizers shall be fired with hydrogen.

Thermal Oxidizers

6. The following requirements shall apply to Thermal Oxidizer 1 (EPN EP3-1).
 - A. Thermal Oxidizer 1 (EPN EP3-1), shall maintain the VOC concentration in the exhaust gas less than 10 ppmv on a dry basis, corrected to 3 percent oxygen, or achieve a VOC destruction efficiency greater than 99.9 percent.
 - B. The thermal oxidizer firebox exit temperature shall be maintained at not less than 2000°C and exhaust oxygen concentration not less than 3 percent on a six-minute average while waste gas is being fed into the oxidizer prior to initial stack testing. After the initial stack test has been completed, the six minute average temperature shall be equal to, or greater than the respective hourly average maintained during the most recent satisfactory stack testing required by Special Condition No. 9.
 - C. The thermal oxidizer exhaust temperature shall be continuously monitored and recorded when waste gas is directed to the oxidizer. The temperature measurement device shall reduce the temperature readings to an averaging period of 6 minutes or less and record it at that frequency. The temperature measurement device shall be installed, calibrated, and maintained according to accepted practice and the manufacturer's specifications. The device shall have an accuracy of the greater of ± 0.75 percent of the temperature being measured expressed in degrees Celsius or $\pm 2.5^\circ\text{C}$.

Quality assured (or valid) data must be generated when the thermal oxidizer is operating except during the performance of a daily zero and span check. Loss of valid data due to periods of monitor break down, out-of-control operation (producing inaccurate data), repair, maintenance, or calibration may be exempted provided it does not exceed 5 percent of the

time (in minutes) that the thermal oxidizer operated over the previous rolling 12 month period. The measurements missed shall be estimated using engineering judgment and the methods used recorded.

- D. The oxygen analyzer used to satisfy this Special Condition shall continuously monitor and record oxygen concentration when waste gas is directed to the oxidizer. It shall reduce the oxygen readings to an averaging period of 6 minutes or less and record it at that frequency.

The oxygen analyzer shall be zeroed and spanned daily and corrective action taken when the 24-hour span drift exceeds two times the amounts specified Performance Specification No. 3, 40 CFR Part 60, Appendix B. Zero and span is not required on weekends and plant holidays if instrument technicians are not normally scheduled on those days.

The analyzer shall be quality-assured at least semiannually using cylinder gas audits (CGAs) in accordance with 40 CFR Part 60, Appendix F, Procedure 1, § 5.1.2, with the following exception: a relative accuracy test audit is not required once every four quarters (i.e., two successive semiannual CGAs may be conducted). An equivalent quality-assurance method approved by the TCEQ may also be used. Successive semiannual audits shall occur no closer than four months. Necessary corrective action shall be taken for all CGA exceedances of ± 15 percent accuracy and any continuous emissions monitoring system downtime in excess of 5 percent of the incinerator operating time. These occurrences and corrective actions shall be reported to the appropriate TCEQ Regional Director on a quarterly basis. Supplemental stack concentration measurements may be required at the discretion of the appropriate TCEQ Regional Director.

Quality assured (or valid) data must be generated when the thermal oxidizer is operating except during the performance of a daily zero and span check. Loss of valid data due to periods of monitor break down, out-of-control operation (producing inaccurate data), repair, maintenance, or calibration may be exempted provided it does not exceed 5 percent of the time (in minutes) that the thermal oxidizer operated over the previous rolling 12 month period. The measurements missed shall be estimated using engineering judgment and the methods used recorded.

7. The following requirements shall apply to Thermal Oxidizer 2 (EPN EP3-1).
- A. Thermal Oxidizer 2 (EPN EP3-1), shall maintain the VOC concentration in the exhaust gas less than 10 ppmv on a dry basis, corrected to 3 percent oxygen, or achieve a VOC destruction efficiency greater than 99.9 percent.
 - B. The thermal oxidizer firebox exit temperature shall be maintained at not less than 2000°C and exhaust oxygen concentration not less than 3 percent on a six-minute average while waste gas is being fed into the oxidizer prior to initial stack testing. After the initial stack test has been completed, the six minute average temperature shall be equal to, or greater than the respective hourly average maintained during the most recent satisfactory stack testing required by Special Condition No. 9.
 - C. The thermal oxidizer exhaust temperature shall be continuously monitored and recorded when waste gas is directed to the oxidizer. The temperature measurement device shall reduce the temperature readings to an averaging period of 6 minutes or less and record it at that frequency. The temperature measurement device shall be installed, calibrated, and maintained according to accepted practice and the manufacturer's specifications. The device

shall have an accuracy of the greater of ± 0.75 percent of the temperature being measured expressed in degrees Celsius or $\pm 2.5^{\circ}\text{C}$.

Quality assured (or valid) data must be generated when the thermal oxidizer is operating except during the performance of a daily zero and span check. Loss of valid data due to periods of monitor break down, out-of-control operation (producing inaccurate data), repair, maintenance, or calibration may be exempted provided it does not exceed 5 percent of the time (in minutes) that the thermal oxidizer operated over the previous rolling 12 month period. The measurements missed shall be estimated using engineering judgment and the methods used recorded.

- D. The oxygen analyzer used to satisfy this Special Condition shall continuously monitor and record oxygen concentration when waste gas is directed to the oxidizer. It shall reduce the oxygen readings to an averaging period of 6 minutes or less and record it at that frequency.

The oxygen analyzer shall be zeroed and spanned daily and corrective action taken when the 24-hour span drift exceeds two times the amounts specified Performance Specification No. 3, 40 CFR Part 60, Appendix B. Zero and span is not required on weekends and plant holidays if instrument technicians are not normally scheduled on those days.

The analyzer shall be quality-assured at least semiannually using cylinder gas audits (CGAs) in accordance with 40 CFR Part 60, Appendix F, Procedure 1, § 5.1.2, with the following exception: a relative accuracy test audit is not required once every four quarters (i.e., two successive semiannual CGAs may be conducted). An equivalent quality-assurance method approved by the TCEQ may also be used. Successive semiannual audits shall occur no closer than four months. Necessary corrective action shall be taken for all CGA exceedances of ± 15 percent accuracy and any continuous emissions monitoring system downtime in excess of 5 percent of the incinerator operating time. These occurrences and corrective actions shall be reported to the appropriate TCEQ Regional Director on a quarterly basis. Supplemental stack concentration measurements may be required at the discretion of the appropriate TCEQ Regional Director.

Quality assured (or valid) data must be generated when the thermal oxidizer is operating except during the performance of a daily zero and span check. Loss of valid data due to periods of monitor break down, out-of-control operation (producing inaccurate data), repair, maintenance, or calibration may be exempted provided it does not exceed 5 percent of the time (in minutes) that the thermal oxidizer operated over the previous rolling 12 month period. The measurements missed shall be estimated using engineering judgment and the methods used recorded.

Fugitives

Piping, Valves, Pumps, and Compressors in contact with Hydrogen Fluoride - 28AVO

8. Except as may be provided for in the Special Conditions of this permit, the following requirements apply to the above-referenced equipment:
- A. Audio, olfactory, and visual checks for leaks within the operating area shall be made every four hours.

- B. Immediately, but no later than one hour upon detection of a leak, plant personnel shall take at least one of the following actions:
- (1) Isolate the leak.
 - (2) Commence repair or replacement of the leaking component.
 - (3) Use a leak collection/containment system to prevent the leak until repair or replacement can be made if immediate repair is not possible.

Date and time of each inspection shall be noted in the operator's log or equivalent. Records shall be maintained at the plant site of all repairs and replacements made due to leaks. These records shall be made available to representatives of the Texas Commission on Environmental Quality (TCEQ) upon request.

Initial Determination of Compliance

9. The permit holder shall perform stack sampling and other testing as required to establish the actual pattern and quantities of air contaminants being emitted into the atmosphere from the thermal oxidizers to demonstrate compliance with the MAERT and Special Condition Nos. 6.A. and 7.A. The permit holder is responsible for providing sampling and testing facilities and conducting the sampling and testing operations at his expense. Sampling shall be conducted in accordance with the appropriate procedures of the Texas Commission on Environmental Quality (TCEQ) Sampling Procedures Manual and the U.S. Environmental Protection Agency (EPA) Reference Methods.

Requests to waive testing for any pollutant specified in this condition shall be submitted to the TCEQ Office of Air, Air Permits Division. Test waivers and alternate/equivalent procedure proposals for Title 40 Code of Federal Regulation Part 60 (40 CFR Part 60) testing which must have EPA approval shall be submitted to the TCEQ Regional Director.

- A. The appropriate TCEQ Regional Office shall be notified not less than 45 days prior to sampling. The notice shall include:
- (1) Proposed date for pretest meeting.
 - (2) Date sampling will occur.
 - (3) Name of firm conducting sampling.
 - (4) Type of sampling equipment to be used.
 - (5) Method or procedure to be used in sampling.
 - (6) Description of any proposed deviation from the sampling procedures specified in this permit or TCEQ/EPA sampling procedures.
 - (7) Procedure/parameters to be used to determine worst case emissions.

The purpose of the pretest meeting is to review the necessary sampling and testing procedures, to provide the proper data forms for recording pertinent data, and to review the format procedures for the test reports. The TCEQ Regional Director must approve any deviation from specified sampling procedures.

- B. Air contaminants emitted from the thermal oxidizers to be tested for include (but are not limited to) VOC.

- C. Sampling shall occur within 60 days after achieving the maximum operating rate, but no later than 180 days after initial start-up of the facilities (or increase in production, as appropriate) and at such other times (identify the need for any periodic sampling here) as may be required by the TCEQ Executive Director. Requests for additional time to perform sampling shall be submitted to the appropriate regional office.
- D. The facility being sampled shall operate at maximum production during stack emission testing. These conditions/parameters and any other primary operating parameters that affect the emission rate shall be monitored and recorded during the stack test. Any additional parameters shall be determined at the pretest meeting and shall be stated in the sampling report. Permit conditions and parameter limits may be waived during stack testing performed under this condition if the proposed condition/parameter range is identified in the test notice specified in paragraph A and accepted by the TCEQ Regional Office. Permit allowable emissions and emission control requirements are not waived and still apply during stack testing periods.

During subsequent operations, if the production is greater than that recorded during the test period, stack sampling shall be performed at the new operating conditions within 120 days. This sampling may be waived by the TCEQ Air Section Manager for the region.
- E. Copies of the final sampling report shall be forwarded to the offices below within 60 days after sampling is completed. Sampling reports shall comply with the attached provisions entitled "Chapter 14, Contents of Sampling Reports" of the TCEQ Sampling Procedures Manual. The reports shall be distributed as follows:
 - One copy to the appropriate TCEQ Regional Office.
 - One copy to each local air pollution control program.
- F. Sampling ports and platform(s) shall be incorporated into the design of (source stack and EPN) according to the specifications set forth in the attachment entitled "Chapter 2, Guidelines for Stack Sampling Facilities" of the Texas Commission on Environmental Quality (TCEQ) Sampling Procedures Manual. Alternate sampling facility designs must be submitted for approval to the TCEQ Regional Director.

Disaster Review

- 10. The holder of this permit shall comply with EPA regulations on Chemical Accident Prevention Provisions promulgated in 40 CFR Part 68. The Risk Management Plan (RMP) shall be submitted to the TCEQ Office of Air, Air Permits Division prior to the date this site first exceeds a threshold quantity of hydrogen fluoride.

Chemical Flexibility

- 11. Except as provided for below, the use of compounds at the Exfluor Research Corporation facility is limited to those identified in the permit application, PI-1 dated, July 7, 2021 (including subsequent submittals made during the permit application review process). New compounds may be added through the use of the procedure below, 30 TAC Chapter 106, or 30 TAC Chapter 116.
 - A. Short-term (pounds per hour [lb/hr]) and annual (TPY) emissions and calculations shall be completed for each chemical at each affected source. Emission rates (ER) shall be calculated with the methods documented in the permit application PI-1 dated, July 7, 2021.

The calculated ER shall not exceed the maximum allowable emissions rate at any emission point.

- B. The Effect Screening Level (ESL) for the compound shall be obtained from the current TCEQ ESL list or by written request to the TCEQ Toxicology Section.
- C. The new compounds or chemicals shall serve the same basic function and the emissions shall be from the same location as the emissions from the current materials.
- D. All the compounds within a new mixture are known, i.e. the weight percentages of the ingredients add to 100 percent or more.
- E. Any air contaminant compound in a new mixture is exempt from the requirements of subparagraph F. below if it meets one of the following conditions:
 - (1) It is emitted at a rate and has a short-term Effects Screening Level (ESL) as stated in the following table; or

Emission Rate (lbs/hr)	Short-term ESL ($\mu\text{g}/\text{m}_3$)
≤ 0.04	≥ 2 & < 500
≤ 0.10	≥ 500 & $< 3,500$
≤ 0.40	$\geq 3,500$

- (2) It has a true vapor pressure at 68°F of less than 0.01 mm Hg.
- F. For all other new or increased air contaminants the following procedure shall be completed:
 - (1) Determine the emission rate (ER) of each air contaminant ingredient including emissions of the same air contaminant from currently authorized materials that may be emitted at the same time from each emission point.
 - (2) Multiply the emission rate of the air contaminant by the unit impact multiplier for each emission point from the following table to determine the off-property impact (Ground Level Concentration (GLC)) for each emission point.

Emission Point	Unit Impact ($\mu\text{g}/\text{m}_3$ per lb/hr)
EP3-1	415.37
EP3-2	56.87
EP3-3	57.54
FUG3-1	37.36
FUG3-2	57.59
FUG3-3	55.58
FUG3-4	55.87

- (3) Sum the impacts from each emission point/emission point group to determine a total off-property impact (Total GLC_{MAX}) for the new or increased air contaminant.
- (4) Compare the total off-property impact to the ESL for the air contaminant as

follows: $\text{Total GLC}_{\text{MAX}} \leq \text{ESL}_{\text{NEW}}$

Where:

$\text{Total GLC}_{\text{MAX}}$ = the sum of the GLCs from each emission point.

ESL_{new} = short-term ESL of new ingredient air contaminant from the most current ESL list published by the TCEQ or as specifically derived by TCEQ Toxicology Section. The ESL shall be obtained in writing prior to the use of the new or increased air contaminant.

- G. Short-term emission rates from new or increased air contaminants shall not cause any increases in air contaminant category annual emission rates as listed on the maximum allowable emission rates table (MAERT).
- H. The permit holder shall maintain records of the information below and the demonstrations in steps A through C above. The following documentation is required for each compound:
- (1) Chemical name(s), composition, and chemical abstract registry number if available.
 - (2) True vapor pressure at maximum hourly and annual average storage temperature.
 - (3) Molecular weight.
 - (4) Storage tanks, loading areas, and fugitive areas where the material is to be handled and the emission control device to be utilized.
 - (5) Date new compound handling commenced.
 - (6) Material Safety Data Sheet.
 - (7) Maximum concentration of the chemical in mole percent (or in weight percent for fugitive areas) in the affected facilities

Permit by Rule

12. The following sources and/or activities are authorized under a Permit by Rule (PBR) by Title 30 Texas Administrative Code Chapter 106 (30 TAC Chapter 106). These lists are not intended to be all inclusive and can be altered without modifications to this permit.

Authorization	Source or Activity
30 TAC § 106.263 (effective 11/01/01)	Routine Facility Maintenance

Date: _____ TBD _____

Emission Sources - Maximum Allowable Emission Rates

Permit Number 165848

This table lists the maximum allowable emission rates and all sources of air contaminants on the applicant's property covered by this permit. The emission rates shown are those derived from information submitted as part of the application for permit and are the maximum rates allowed for these facilities, sources, and related activities. Any proposed increase in emission rates may require an application for a modification of the facilities covered by this permit.

Air Contaminants Data

Emission Point No. (1)	Source Name (2)	Air Contaminant Name (3)	Emission Rates	
			lbs/hour	TPY (4)
EP3-1	Exhaust Gas Vent System, Thermal Oxidizer 1, and Thermal Oxidizer 2	VOC	0.16	0.14
		NO _x	0.03	0.13
		CO	0.04	0.18
		PM	<0.01	0.02
		PM ₁₀	<0.01	0.02
		PM _{2.5}	<0.01	0.02
		HF	<0.01	0.03
		HCl	0.02	0.09
		F ₂	<0.01	<0.01
		Br ₂	<0.01	<0.01
		HBr	<0.01	<0.01
	Exempt organic compounds	1.05	4.40	
EP3-2	Washing Reactor 1	VOC	0.73	0.20
EP3-3	Washing Reactor 2	VOC	0.98	0.27
EP3-4	Water Reservoir	VOC	< 0.01	0.02
FUG3-1	Building 3 Fugitives (5)	VOC	1.75	7.67
		HF	0.13	0.56
		F ₂	0.10	0.45
		Br ₂	0.14	0.60
		H ₂	0.06	0.26
		Exempt organic compounds	1.65	7.21
FUG3-2	Reduction Reactor 1 Fugitives (5)	VOC	0.03	0.13
		HCl	0.01	0.03

Emission Sources - Maximum Allowable Emission Rates

Emission Point No. (1)	Source Name (2)	Air Contaminant Name (3)	Emission Rates	
			lbs/hour	TPY (4)
FUG3-3	Reduction Reactor 2 Fugitives (5)	VOC	0.03	0.13
		HCl	0.01	0.02
		Exempt organic compounds	0.06	0.26
FUG3-4	Reduction Reactor 3 Fugitives (5)	VOC	0.06	0.25
		HCl	0.01	0.01
		Exempt organic compounds	0.10	0.42
FUG3-5	Solvent Strip Column 3 Fugitives (5)	VOC	< 0.01	< 0.01
		Exempt organic compounds	0.01	0.04

- (1) Emission point identification - either specific equipment designation or emission point number from plot plan.
- (2) Specific point source name. For fugitive sources, use area name or fugitive source name.
- (3) VOC - volatile organic compounds as defined in Title 30 Texas Administrative Code § 101.1
 - NO_x - total oxides of nitrogen
 - CO - carbon monoxide
 - HF - hydrogen fluoride
 - HCl - hydrogen chloride
 - F₂ - Fluorine
 - Br₂ - Bromine
 - HBr - hydrogen bromide
 - H₂ - hydrogen
 - Exempt organic compounds - Those carbon compounds or mixtures of carbon compounds which have been excluded from the definition of volatile organic compound.
- (4) Compliance with annual emission limits (tons per year) is based on a 12-month rolling period.
- (5) Emission rate is an estimate and is enforceable through compliance with the applicable special condition(s) and permit application representations.

Date: _____ TBD _____

Application Exhibit 16

TCEQ Chief Clerk's NAPD Mailing List

165848

THE HONORABLE CHARLES
SCHWERTNER
TEXAS SENATE
DISTRICT ROOM 3E.10
TEXAS STATE CAPITOL
Charles.schwertner@senate.texas.gov

THE HONORABLE JOHN BUCY
TEXAS HOUSE OF REPRESENTATIVES
DISTRICT ROOM E2.602
TEXAS STATE CAPITOL
john.bucy@house.texas.gov

THE HONORABLE JAMES TALARICO
TEXAS HOUSE OF REPRESENTATIVES
DISTRICT ROOM E2.418
TEXAS STATE CAPITOL
james.talarico@house.texas.gov

THE HONORABLE TERRY WILSON
TEXAS HOUSE OF REPRESENTATIVES
DISTRICT ROOM E2.714
TEXAS STATE CAPITOL
Terry.wilson@house.texas.gov

State Leg

Mailed
2.24.2022
APP-00480

CAPITAL AREA COUNCIL OF GOVERN
6800 BURLESON RD STE 165
AUSTIN TX 78744-2325

CITY OF AUSTIN WATERSHED DEPT.
TPDES PERMIT
PO BOX 1088
AUSTIN TX 78767-1088

PUBLIC HEALTH REGION 7
TEXAS DEPARTMENT OF STATE HEAL
2408 S 37TH ST
TEMPLE TX 76504-7168

US ARMY CORPS OF ENGINEERS REG
CESWS-PER-R
PO BOX 17300
FORT WORTH TX 76102-0300

FIELD SUPERVISOR
US FISH & WILDLIFE SERVICE
10711 BURNET RD STE 200
AUSTIN TX 78758-4460

WILLIAMSON COUNTY & CITIES HEA
355 TEXAS AVE
ROUND ROCK TX 78664-2565

WILLIAMSON COUNTY JUDGE
710 S MAIN ST STE 101
GEORGETOWN TX 78626-5701

JIM BRIGGS
CITY OF GEORGETOWN UTILITY SYS
PO BOX 409
GEORGETOWN TX 78627-0409

MR MICHAEL THANE DIR OF UTI
CITY OF ROUND ROCK
2008 ENTERPRISE DR
ROUND ROCK TX 78664-2120

MR MICHAEL THANE DIR OF UTI
CITY OF ROUND ROCK
2008 ENTERPRISE DR
ROUND ROCK TX 78664

LAURALEE VALLON GENERAL CO
BRAZOS RIVER AUTHORITY
4600 COBBS DR
PO BOX 7555
WACO TX 76714-7555

RACHEL AUSTIN
CITY OF JONESTOWN
PO BOX 5023
JONESTOWN TX 78645-0002

SUZY BATES
16249 W STATE HIGHWAY 29
LIBERTY HILL TX 78642-3803

MR JOHN J CARLTON
THE CARLTON LAW FIRM PLLC
STE B130
4301 WESTBANK DR
AUSTIN TX 78746-6568

SHARON H CASSADY
1541 ORCHARD DR
LEANDER TX 78641-1370

JAMES R CLARNO
108 TRINITY LN
GEORGETOWN TX 78633-4118

CONCERNED CITIZEN
CITY OF AUSTIN - AUSTIN WATER UTILITY
ATTN DIRECTOR
PO BOX 1088
AUSTIN TX 78767-1088

NOELKE COTTON
LAW DEPARTMENT CITY OF AUSTIN
PO BOX 1088
AUSTIN TX 78767-1088

BETTY & CHESTER CRITCHFIELD
PECAN SPRINGS RANCH
801 COUNTY ROAD 344
JARRELL TX 76537-1194

DAVID O FREDERICK
PERALES ALLMON & ICE PC
1206 SAN ANTONIO ST
AUSTIN TX 78701-1834

JUDY GRACI
15775 BOOTH CIR
VOLENTE TX 78641-9684

LORAIN HOANE
4920 N INTERSTATE 35
AUSTIN TX 78751-2716

M D HOSSAIN
CITY OF KILLEEN
PUBLIC WORKS/ENGINEERING
200 E AVENUE D
KILLEEN TX 76541-5228

MONICA JACOBS
KELLY HART & HALLMAN LLP
STE 2000
303 COLORADO ST
AUSTIN TX 78701-4653

MR & MRS GARY JOHNSON
1011 RED CLIFF DR
AUSTIN TX 78758-5133

CORY R JUBY
826 LINGER LN
AUSTIN TX 78721-3650

CHUCK & DALE L MARTIN
APT 152
10600 JOLLYVILLE RD
AUSTIN TX 78759-6276

CHUCK & DALE L MARTIN
187 ESTRELLA XING
GEORGETOWN TX 78628-6973

KEN MARTIN PE
MARTIN PRATER & ASSOCIATES
2109 CRAIG PATRICK WAY
AUSTIN TX 78748-3537

LYLE A MCELDERRY
408 WYNDHAM HILL PKWY
TEMPLE TX 76502-1974

SUSAN MECKEL
LOWER COLORADO RIVER AUTHORITY
L106
PO BOX 220
AUSTIN TX 78767-0220

ANDREW MILLER
STE 370-134
6001 W PARMER LN
AUSTIN TX 78727-3901

ANDREW S MILLER
KEMP SMITH LLP
STE 1305
919 CONGRESS AVE
AUSTIN TX 78701-2102

ROSANA NAREZ
PO BOX 93331
SOUTHLAKE TX 76092-0113

ROSANA NAREZ
TEX-MEX NEWS
PO BOX 8665
WACO TX 76714-8665

MARK NUNEZ
CITY OF HUTTO
356 COUNTY ROAD 199
HUTTO TX 78634-4271

KENNETH & RITA SCHOEN
1437 SLAWSON LN
KILLEEN TX 76542-4271

STEVEN SMELTZER
ALAMO AREA COUNCIL OF GOVERNMENTS
STE 110
2700 NE LOOP 410
SAN ANTONIO TX 78217-4840

STEVEN SMELTZER
ALAMO AREA COUNCIL OF GOVERNMENTS
STE 160
8700 TESORO DR
SAN ANTONIO TX 78217-6208

MR S SORENSON
BRUSH BEND PROPERTY OWNERS ASSOC
901 BRUSHY BEND DR
ROUND ROCK TX 78681-1401

MICHAEL D THANE
3400 SUNRISE RD
ROUND ROCK TX 78665-2398

ALLISON THRASH
15100 FM 2769
VOLENTE TX 78641-9139

NANCY WEBBER
4128 LAWLESS ST
AUSTIN TX 78723-5393

GREGORY J WHITE IND PRETREAT
CEDAR PARK PUBLIC WORKS DEPT
2315 BRUSHY CREEK LOOP
CEDAR PARK TX 78613-3162

Application Exhibit 17

NAPD Proof of Publication (Affidavits/Tearsheets for English and Bilingual)

TCEQ-Office of the Chief Clerk
MC-105 Attn: Notice Team
P.O. Box 13087
Austin, Texas 78711-3087

124292

Applicant Name: Exflur Research Corporation
Permit No.: 165848
Application Received Date: July 9, 2021

AFFIDAVIT OF PUBLICATION FOR AIR PERMITTING

STATE OF TEXAS §
COUNTY OF Williamson §

BEFORE ME, the undersigned authority, on this day personally appeared

Ellen Greaney, who being by me duly sworn, deposes and says that (s)he is (Name of Person Representing Newspaper)

the Archivist of the Williamson County Sun
(Title of Person Representing Newspaper) (Name of the Newspaper)

that said newspaper is generally circulated in Florence, Texas;
(The municipality or nearest municipality to the location of the facility or the proposed facility)

that the enclosed notice was published in said newspaper on the following date(s):

March 6, 2022
Ellen Greaney
(Newspaper Representative's Signature)

Subscribed and sworn to before me this the 7th day of March, 2022
to certify which witness my hand and seal of office.

[Affix Seal]



Dawn Steele
Notary Public in and for the State of Texas

Dawn Steele
Print or Type Name of Notary Public

8-26-24
My Commission Expires

services manager for the city, said. If paid as proposed, it does not actually expand the amount of long-term debt the city takes on.

Single public information phone number

to make it easier for the

other departments, such as Human Resources and Information Technology, serve other city departments - not the public directly - and they must charge the other departments for their work, he said.

TO ALL INTERESTED PERSONS AND PARTIES:

Exfluor Research Corporation, has applied to the Texas Commission on Environmental Quality (TCEQ) for issuance of Proposed Air Quality Permit Number 165848, which would authorize construction of the Exfluor Research facility located at 1100 County Road 236, Florence, Wilberson County, Texas 78527. This application was processed in an expedited manner, as allowed by the commission's rules in 30 Texas Administrative Code, Chapter 101, Subchapter J. Additional information concerning this application is contained in the public notice section of this newspaper.

The Sunday Sun

Phone: 512-930-4824

News: editor@wilcosun.com

Advertising: ads@wilcosun.com

Web: www.wilcosun.com

Mail: P.O. Box 39,

Georgetown, TX 78627

Location: 707 Main Street,

Georgetown, TX 78626

Postmaster - Send address changes to: The Sunday Sun, P.O. Box 39, Georgetown, Texas 78627. The Sunday Sun (USPS 018-790) published weekly by Sun Systems, Inc., 707 Main Street, Georgetown, Texas 78627. Periodicals Postage Paid at Georgetown, Texas.

ROY SERIES :

Theft

at

Conference Room

Ave

as 78626

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30 PM

eam Bar

ncial literacy series. He will be financial scams, recognizing possible the chance of falling victim to scams.

n March 25th

liability.

y at cbailey@firsttexasbank.com



bank.bank

The Sunday Sun, March 6, 2022 3



Public Notice

THE STATE OF TEXAS COUNTY OF WILLIAMSON
 CITATION BY PUBLICATION
 DIVORCE
 NO. 20-0091-CPSC1

Zachary Morgan
 to all whom it may concern,
 MEETING.
 YOU HAVE BEEN SUED. YOU MAY
 PLOY AN ATTORNEY. IF YOU
 YOUR ATTORNEY DO NOT FILE
 WRITTEN ANSWER WITH THE
 ERK WHO ISSUED THIS CITATION
 10.00 A.M. ON THE MONDAY
 TWENTY DAYS AFTER YOU
 RE SERVED THIS CITATION AND
 ITION, A DEFAULT JUDGMENT
 THE RELIEF DEMANDED IN THE
 TION MAY BE TAKEN AGAINST
 IN ADDITION TO FILING A

CPSC1, and entitled in the
 of Kaylee Meehan, Kaitlyn
 Kash, Meedars, Minor
 then. The suit requests termination
 he parent-child relationship. The
 and place of birth of the children
 are the subjects of the suit. Kaylee
 han, Born September 8, 2010
 Williamson County, Texas; Kaitlyn
 ers, Born November 22, 2017 In
 mson County, Texas; and Kash
 ers, Born April 17, 2020 in Bell
 y, Texas. The court has authority
 suit to render an order in the
 wo interest that will be binding
 on, including the termination
 parent-child relationship, the
 ination of paternity, and the
 ment of a conservator with
 y to consent to the children's
 n. The Court has the authority
 suit to enter any judgment or
 dissolving the marriage and
 g for the division of property
 be binding on you.

AND GIVEN UNDER MY
 AND SEAL of said Court
 on this the 22nd day of
 at, 2021.
 id, District Clerk
 M, 405 Martin Luther King,
 Georgetown, TX 78627
 in County, Texas
 1212
 ina Rodriguez
 idiguez, Deputy
 OF ATTORNEY FOR
 ER,
 Hobbs, Jr.
 Luther King Box 7
 in TX 78626

ON BY PUBLICATION
 OF TEXAS COUNTY OF
 WILLIAMSON
 D. 20-0647-CP95

Yen Tram Trinh vs. Billy

TO DEFENDANT.

BEEN SUED. YOU MAY
 Y ATTORNEY. IF YOU
 TORNEY DO NOT FILE
 ANSWER WITH THE
 ISSUED THIS CITATION
 M ON THE MONDAY
 WING THE EXPIRATION
 WO DAYS AFTER THE
 TATION WAS ISSUED,
 JUDGMENT FOR
 DEMANDED IN THE
 BE TAKEN AGAINST
 TION TO FILING A
 ISER WITH THE

CITATION BY PUBLICATION
 PC 102.010
 Cause # 21-0016-CP339

THE STATE OF TEXAS COUNTY OF WILLIAMSON

TO: JOSE VELZ AND TO WHOM IT MAY CONCERN

NOTICE TO RESPONDENT: YOU HAVE BEEN SUED. YOU MAY

an attorney. If you or your

do not file a written answer

with the clerk who issued this citation

on the Monday next following

the expiration of 20 days after

you were served this citation,

a default judgment may be

taken against you. In addition

to the relief demanded in the

petition, a default judgment

may be taken against you.

In addition to filing a

written answer with the clerk,

you are required to make initial

disclosures generally must be

no later than 30 days after you

answer with the clerk. Find out

more at www.texaslawhelp.org.

The petition of Texas Farm

Department of Protective S

was filed in the 395th Judicial

Court of Williamson County, T

on the 3rd day of March, 2021, nu

21-0016-CP3395 and entitled

in *State of Texas vs. Jose Velz*.

Incurred by the City for: (1) acq

upgrading City radio commo

equipment and public safety e

including self-contained

apparatus fire safety equip

renovating, improving and

existing City Municipal

buildings: (8) constructing, i

renovating, expanding and

a public safety facility of

of a City Fire Logistics bui

acquiring and upgrading city

including fire and police veh

NOTICE TO CREDITORS

Notice is given that original Letters
 Testamentary for the Estate of Richard
 Campbell Foltz were issued on
 February 24, 2022, in docket number
 1428-CP4, pending in the County
 Court at Law Number 4 of Williamson
 County, Texas, to Margarita O. Foltz,
 a person having claims against
 the estate, which is presently being
 administered, are required to submit
 them, within the time and manner
 prescribed by law, and before the
 estate is closed, addressed as follows:

Representative
 Estate of Richard Campbell Foltz
 c/o Joshua Wilson
 1000 Heritage Center Circle
 Round Rock, TX 78664

PUBLIC NOTICE WILLIAMSON COUNTY

The Williamson County Commissioners' Court invites the submission of Online Auction Bids for:
SALE OF SURPLUS PROPERTY
 The County has Office Furniture, Office Machines, Computers & Accessories, Security Equipment and Industrial Equipment that will be put up for auction. The online auction will be open from Wednesday, March 9, 2022, until

THE ESTATE OF MERVIN EDWARD GILLARD

Administration of the Estate of Mervin Edward Gillard, Decedent, has been commenced by the issuance of Letters of Dependent Administration to J. Lee Jarrard, Jr., Dependent Administrator of the Estate, on February 16, 2022, by the County Court of Williamson County, Texas, acting in Cause No. 21-1114-CP4, styled In Re Estate of Mervin Edward Gillard, Decedent, in which court the matter is pending.

All persons having claims against the estate are notified to present them in care of J. Lee Jarrard, Jr., Dietz & Jarrard, PC, 106 Fannin Ave. East, Round Rock, Texas 78664. Dependent Administrator of the Estate. Dated: March 2, 2022

By: /s/ J. Lee Jarrard, Jr.
 J. Lee Jarrard, Jr.
 Dependent Administrator for the Estate of Mervin Edward Gillard
 State Bar No. 10678200
 Dietz & Jarrard, PC
 106 Fannin Ave. East
 Round Rock, Texas 78664
 (512)244-9314
 Facsimile: (512)244-3768
 ljarrard@lawdietz.com

NOTICE TO ALL PERSONS HAVING CLAIMS

Property includes contents of the following info: Furniture, Saucedo-Household, Collectibles, Clewson-Furniture, Misc Household Items, Gonzales-Furniture, Bags, Totes, Brown-Personal Items, Suitcase, Clothes, Dowdy-Furniture, Valdez-Washer, Dryer, Lamp, Bika, Contact Hometown Self-Storage, Inc., 401 West 21st St, Georgetown, TX 78626 512-864-9009

CITATION BY PUBLICATION THE STATE OF TEXAS COUNTY OF WILLIAMSON

TO ALL PERSONS INTERESTED IN THE ESTATE OF LINDA MARIE WRIGHT, DECEASED, Cause No. 22-0238-CP4, in County Court at Law #4 of Williamson County, 405 Martin Luther King Street, Georgetown, Texas 78626, LISA MARIE WRIGHT, Applicant, in the above numbered and entitled estate, filed on the 1st day of March, 2022 an APPLICATION FOR ISSUANCE OF LETTERS OF INDEPENDENT ADMINISTRATION AND TO DETERMINE HEIRSHIP of the said estate and requests that the said Court determine who are the heirs and

continued on T1

Texas Commission on Environmental Quality



Public Library, 207 East Main Street, Williamson County, Texas beginning the first day of publication of this notice. The facility's compliance file, if any exists, is available for public review at the TCEQ Austin Regional Office, 12100 Park 35 Circle Building A Room 178, Austin, Texas.

NOTICE OF APPLICATION AND PRELIMINARY DECISION FOR AN AIR QUALITY PERMIT

PROPOSED PERMIT NUMBER: 188948

APPLICATION AND PRELIMINARY DECISION. Exflur Research Corporation has applied to the Texas Commission on Environmental Quality (TCEQ) for issuance of Proposed Air Quality Permit Number: 188948, which would authorize construction of the Exflur Research facility located at 1100 County Road 238, Florence, Williamson County, Texas 78627. This application was processed in an expedited manner, as allowed by the commission's rules in 30 Texas Administrative Code, Chapter 101, Subchapter J. This application was submitted to the TCEQ on July 8, 2021. The proposed facility will emit the following contaminants: hydrogen fluoride, carbon monoxide, hazardous air pollutants, nitrogen oxides and organic compounds.

The executive director has completed the technical review of the application and prepared a draft permit which, if approved, would establish the conditions under which the facility must operate. The executive director has made a preliminary decision to issue the permit because it meets all rules and regulations. The permit application, executive director's preliminary decision, and draft permit will be available for viewing and copying at the TCEQ central office, the TCEQ Austin regional office, and at the Eula Hunt Beck Florence

PUBLIC COMMENT/PUBLIC MEETING. You may submit public comments or request a public meeting about this application. The purpose of a public meeting is to provide the opportunity to submit comment or to ask questions about the application. The TCEQ will hold a public meeting if the executive director determines that there is a significant degree of public interest in the application or if requested by a local legislator. A public meeting is not a contested case hearing. You may submit additional written public comments within 30 days of the date of newspaper publication of this notice in the manner set forth in the AGENCY CONTACTS AND INFORMATION paragraph below.

RESPONSE TO COMMENTS AND EXECUTIVE DIRECTOR ACTION. After the deadline for public comments, the executive director will consider the comments and prepare a response to all relevant and material or significant public comments. Because no timely hearing requests have been received after preparing the response to comments, the executive director may then issue final approval of the application. The response to comments, along with the executive director's decision on the application will be mailed to everyone who submitted public comments or is on a mailing list for this application, and will be posted electronically to the Commissioners' Integrated Database (CID).

INFORMATION AVAILABLE ONLINE. When they become available, the executive director's

response to comments and the final decision on this application will be accessible through the Commission's Web site at www.tceq.texas.gov/cid/. Once you have access to the CID using the above link, enter the permit number for this application which is provided at the top of this notice. This link to an electronic map of the site or facility's general location is provided as a public courtesy and not part of the application or notice. For exact location, refer to application <http://www.tceq.texas.gov/assata/public/hb610/index.html?al=92.79111&lang=92.904189&zoom=13&vmapr>.

MAILING LIST. You may ask to be placed on a mailing list to obtain additional information on this application by sending a request to the Office of the Chief Clerk at the address below.

AGENCY CONTACTS AND INFORMATION. Public comments and requests must be submitted either electronically at www.tceq.texas.gov/assata/Comments/, or in writing to the Texas Commission on Environmental Quality, Office of the Chief Clerk, MC-105, P.O. Box 13087, Austin, Texas 78711-3087. Please be aware that any contact information you provide, including your name, phone number, email address and physical address will become part of the agency's public record. For more information about this permit application or the permitting process, please call the Public Education Program toll free at 18006674040. Si desea información en Español, puede llamar al 1-800-687-4040.

Further information may also be obtained from Exflur Research Corporation at the address stated above or by calling Dr. Thomas Blaschek, PhD, Vice President at (512) 310-9044.

Notice Issuance Date: February 23, 2022

124 292

TCEQ-Office of the Chief Clerk
MC-105 Attn: Notice Team
P.O. Box 13087
Austin, Texas 78711-3087

Applicant Name: Exflour Research Corporation
Permit No.: 165848
Application Received Date: July 9, 2021

ALTERNATIVE LANGUAGE AFFIDAVIT OF PUBLICATION FOR AIR PERMITTING

STATE OF TEXAS §
COUNTY OF Travis §

BEFORE ME, the undersigned authority, on this day personally appeared

Irma B. Portuondo, who being by me duly sworn, deposes and says that (s)he is (Name of Person Representing Newspaper)

the Traffic Manager of the El Mundo Newspaper
(Title of Person Representing Newspaper) (Name of the Newspaper)

that said newspaper is generally circulated in williamsou, Texas;
(The municipality or county in which the facility or proposed facility is located)

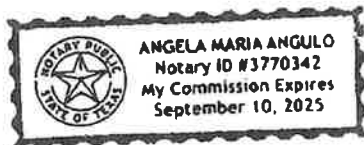
that the enclosed notice was published in said newspaper on the following date(s):

March 10, 2022

Irma Portuondo
(Newspaper Representative's Signature)

Subscribe and sworn to before me this the 10 day of March, 2022
to certify which witness my hand and seal of office

[Affix Seal]



[Signature]
Notary Public in and for the State of Texas
Angela M. Angulo
Print or Type Name of Notary Public

September 10, 2025
My Commission Expires

COMISION DE CALIDAD ASISTENCIAL DE VECINOS



Comisión de Calidad Asistencial de Vecinos

El propósito de esta Comisión es garantizar la calidad de los servicios de salud que reciben los pacientes...

El propósito de esta Comisión es garantizar la calidad de los servicios de salud que reciben los pacientes...

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COMISION DE CALIDAD ASISTENCIAL DE VECINOS



Comisión de Calidad Asistencial de Vecinos

El propósito de esta Comisión es garantizar la calidad de los servicios de salud que reciben los pacientes...

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El propósito de esta Comisión es garantizar la calidad de los servicios de salud que reciben los pacientes...

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goldcorp SOLICITA SERVIDORES, COCINEROS, PANADEROS Y LAVAPLATOS

TU SUPERPODER ES TRABAJO EN EQUIPO? SORTEO MENSUAL DE Apreciación DE LOS EMPLEADOS

La Posada SOLICITA

Solicitud gratuita para trabajar con mascotas

COMPANIA DE LIMPIEZA

SOLICITO PERSONAL PARA LIMPIEZA DE CASAS Y DEPARTAMENTOS

SOLICITO personal de construcción

RENTA

SERVICIO

SE RENTA CUARTO EN CASA

AVISO PÚBLICO Aclaraciones Breves De Las Enmiendas Constitucionales Elección Especial del 7 de Mayo de 2022

Prevenición del Suicidio RECURSOS

Casa Nueva con Terreno Pare de Rentar!

Línea Nacional de Prevención del Suicidio: 800-273-8255 (TALK)

CASAS MÓVILES Y MODULARES PAQUETE DE TERRENO Y CASA!

Paul Worrall

From: arloe.fontenot@exfluor.com
Sent: Thursday, March 17, 2022 1:15 PM
To: PROOFS
Cc: bierschenk_t@exfluor.com; eric.bierschenk@exfluor.com; 'Joerg Windolph'
Subject: Exfluor NSR 165848 Proof of Publication
Attachments: Exfluor Proof of Publication165848.pdf

See attached Proof of Publication

Thanks,

Arloe Fontenot
EHS Manager
Exfluor Research Corp
Round Rock, Texas
C: 225-636-1010
O: 512-310-9044
exfluor.com



Paul Worrall

From: arloe.fontenot@exfluor.com
Sent: Friday, March 18, 2022 1:24 PM
To: PROOFS
Subject: ExFluor Proof of Publication - Alternative Language
Attachments: Exfluor El Mundo Pg1 March 10 2022.pdf; Exfluor El Mundo Pg 2 March 10 2022.pdf

See proof of publication in alternative language newspaper

Arloe Fontenot
EHS Manager
Exfluor Research Corp
Round Rock, Texas
C: 225-636-1010
O: 512-310-9044
exfluor.com



Application Exhibit 18

TCEQ ED and Applicant Bilingual Public Notice Correspondence

From: arloe.fontenot@exfluor.com
Sent: Thursday, March 24, 2022 3:30 PM
To: 'Joerg Windolph'; Cara Hill
Subject: RE: Exfluor public notice
Attachments: Exfluor El Mundo Pg1 March 10 2022.pdf; Exfluor El Mundo Pg 2 March 10 2022.pdf; Affidavit El Mundo Exfluor 3.10.2022.pdf

Sure Joerg.

Hi Cara,
The notice ran in Spanish language newspaper El Mundo on March 10.
See attached notice and affidavit.

Thanks,

Arloe Fontenot
EHS Manager
Exfluor Research Corp
Round Rock, Texas
C: 225-636-1010
O: 512-310-9044
exfluor.com



From: Joerg Windolph <JWindolph@WAID.com>
Sent: Thursday, March 24, 2022 3:13 PM
To: arloe.fontenot@exfluor.com
Subject: FW: Exfluor public notice

Arloe,

Can you answer the question from Cara regarding the public notice date in Spanish.

Thanks,

Joerg Windolph, P.E.
Principal Engineer
Waid Environmental
13785 Research Blvd., Suite 100
Austin, Texas 78750
Office: 512-255-9999
Cell: 512-550-8147
<http://www.waid.com>

Privilege and Confidentiality Notice

The following electronic message contains information that should be treated as confidential or privileged. The information is intended to be for the use of the individual or entity named above. If you are not the intended recipient, be aware that any disclosure, copying, distribution or use of the contents of this message is prohibited. If you have received this electronic message in error, please notify us immediately by telephone at (512) 255-9999.

From: Cara Hill <Cara.Hill@Tceq.Texas.Gov>
Sent: Thursday, March 24, 2022 3:10 PM
To: Joerg Windolph <JWindolph@WAID.com>
Subject: Exfluor public notice

Hi Joerg,

I just wanted to see what date the Spanish notice published. I saw that the English notice was published 3/6, but just wanted to check on the Spanish so we will know when the comment period will end.

Thanks,
Cara Hill
TCEQ Air Permits
512-239-5123

How is our customer service? www.tceq.texas.gov/customersurvey

CAUTION: This message was sent from an external source. **Take Caution** when opening attachments and links.

TCEQ-Office of the Chief Clerk
MC-105 Attn: Notice Team
P.O. Box 13087
Austin, Texas 78711-3087

Applicant Name: Exflur Research Corporation
Permit No.: 165848
Application Received Date: July 9, 2021

ALTERNATIVE LANGUAGE AFFIDAVIT OF PUBLICATION FOR AIR PERMITTING

STATE OF TEXAS §
COUNTY OF Travis §

BEFORE ME, the undersigned authority, on this day personally appeared

Irma B. Portuondo, who being by me duly sworn, deposes and says that (s)he is (Name of Person Representing Newspaper)

the Traffic Manager of the El Mundo Newspaper
(Title of Person Representing Newspaper) (Name of the Newspaper)

that said newspaper is generally circulated in Williamson, Texas;
(The municipality or county in which the facility or proposed facility is located)

that the enclosed notice was published in said newspaper on the following date(s):

March 10, 2022

Irma Portuondo
(Newspaper Representative's Signature)

Subscribe and sworn to before me this the 10 day of March, 2022
to certify which witness my hand and seal of office.

[Affix Seal]



Angela M. Angulo
Notary Public in and for the State of Texas
Print or Type Name of Notary Public
September 10, 2025
My Commission Expires

COMISIÓN DE CALIDAD AMBIENTAL DE TEXAS



Noticia de Aplicación y Decisión Preliminar para un Permiso de Calidad de Aire

PERMISO PROPUESTO No. 166848

APLICACIÓN. Edcor Research Corporation ha solicitado a la Comisión de Calidad Ambiental de Texas (TCEQ, por sus siglas en inglés) para emisión de un Permiso Propuesto de Calidad de Aire Núm. 165848, el cual autorizaría la construcción de una facilidad de Edcor Research ubicada en 1100 County Road 236, Florence, Condado de Williamson, Texas 76527. Esta aplicación está siendo procesada de una manera acelerada, como se permitió por las reglas de la comisión en el Código Administrativo de Texas 30, Capítulo 101, Subcapítulo J. Esta solicitud se presentó a la TCEQ el 9 de Julio del 2021. La instalación existente y/o las instalaciones relacionadas están autorizadas para emitir las siguientes contaminantes: Fluoruro de hidrógeno, monóxido de carbono, materia particulada peligrosa, óxidos de nitrógeno y componentes orgánicos.

El director ejecutivo ha completado las revisiones de la aplicación y ha preparado un borrador del permiso que de ser aprobado, establecería las condiciones bajo las cuales la planta deberá operar. El Director Ejecutivo ha hecho una decisión preliminar de emitir la registración porque cumple con todas las reglas aplicables. La aplicación decisión preliminar del Director Ejecutivo y el permiso estándar estarán disponibles para ser revisados y copiados en la oficina central de la TCEQ, en la oficina regional de la TCEQ en Austin y la Biblioteca Pública de Eula Hunt Beck Florence ubicada en el 207 East Main Street, Condado de Williamson, Texas, comenzando el primer día de la publicación de esta noticia. El archivo de cumplimiento de la instalación, si existe alguno, estará disponible para el público en la Oficina Regional del TCEQ en Austin ubicada en el 12100 Park 35 Circle Edificio A Oficina 179, Austin, Texas.

COMENTARIO PÚBLICO Usted puede presentar comentarios públicos o solicitar una reunión pública acerca de esta aplicación. El propósito de una junta pública es para dar la oportunidad de dar sus comentarios o hacer preguntas acerca de la aplicación.

Vea la sección de contactos. La TCEQ tomará en cuenta todos los comentarios públicos en la decisión final sobre la solicitud. La fecha límite para presentar comentarios públicos es 30 días después de que se publique el aviso en el periódico. Cuestiones tales como valor de propiedad, ruido, seguridad del tráfico, y zonificación no están dentro de la jurisdicción de la TCEQ para abordarse en el proceso del permiso. Una reunión pública acerca de la aplicación se hará si el Director Ejecutivo determina que hay un grado

Comisión de Calidad Ambiental de Texas



COMUNTO

AVISO DE RECIBO DE SOLICITUD E INTENTO DE OBTENER PERMISO DE CALIDAD DE AGUA (6899)

Y AVISO DE SOLICITUD Y DECISIÓN PRELIMINAR PROPUESTOS TIPOS PARA AGUAS RESIDUALES MUNICIPALES NUEVO PERMISO NO. W9991000001

SOLICITUD Y DECISIÓN PRELIMINAR. O'Brien et Ivan, LLC, 1090 San Felipe Street Suite 305, Houston, Texas 77054, solicitó a la Comisión de Calidad Ambiental de Texas (TCEQ) el nuevo Permiso No. W9991000001 del Sistema de Eliminación de Descargas de Contaminantes de Texas (TDCD), para autorizar la descarga de aguas residuales domésticas tratadas a un flujo promedio diario que no excede las 225,000 galones por día. TCEQ recibió esta solicitud el 5 de noviembre de 2021.

El sitio candidato se encuentra para entregar la ruta de descarga establecida en la 1994.

La instalación se ubicará aproximadamente a 1,500 pies al noroeste de la intersección de County Road 101 y State Highway 78, en el condado de Williamson, Texas 76704. El sitio candidato se descargará a un estuario sin corriente, de allí a Little Mustang Creek y de allí al sitio de construcción de aguas residuales tratadas a un flujo promedio diario que no excede las 225,000 galones por día. TCEQ recibió esta solicitud el 5 de noviembre de 2021. La instalación se ubicará aproximadamente a 1,500 pies al noroeste de la intersección de County Road 101 y State Highway 78, en el condado de Williamson, Texas 76704. El sitio candidato se descargará a un estuario sin corriente, de allí a Little Mustang Creek y de allí al sitio de construcción de aguas residuales tratadas a un flujo promedio diario que no excede las 225,000 galones por día. TCEQ recibió esta solicitud el 5 de noviembre de 2021. La instalación se ubicará aproximadamente a 1,500 pies al noroeste de la intersección de County Road 101 y State Highway 78, en el condado de Williamson, Texas 76704. El sitio candidato se descargará a un estuario sin corriente, de allí a Little Mustang Creek y de allí al sitio de construcción de aguas residuales tratadas a un flujo promedio diario que no excede las 225,000 galones por día. TCEQ recibió esta solicitud el 5 de noviembre de 2021.

El Director Ejecutivo de la TCEQ completó la revisión técnica de la solicitud y preparó un borrador del permiso. El borrador del permiso, si se aprueba, establecería las condiciones bajo las cuales debe operar la instalación. El Director Ejecutivo ha tomado una decisión preliminar de que este permiso, si se emite, cumple con todas las reglas legales y reglamentarias. La solicitud de permiso, la decisión preliminar del Director Ejecutivo y el borrador del permiso están disponibles para ser revisados y copiados en la Biblioteca Pública de Georgetown, 402 West 8th Street, Georgetown, Texas.

COMENTARIO PÚBLICO / REUNIÓN PÚBLICA. Puede enviar comentarios públicos o solicitar una reunión pública sobre esta solicitud. El propósito de una reunión pública es brindar la oportunidad de enviar comentarios o hacer preguntas sobre la solicitud. La TCEQ recibirá sus comentarios públicos al Director Ejecutivo determine que existe un grado significativo de interés público en la solicitud o si la aplica un legislador local. Una reunión pública no es una sesión de caso legislativo.

OPORTUNIDAD PARA UNA AUDIENCIA DE CASO IMPEDIMIENTOS. Después de la fecha límite para enviar comentarios públicos, el Director Ejecutivo considerará todos los comentarios oportunos y preparará una respuesta a todos los comentarios públicos relevantes y establecerá o modificará la decisión que se emite.

EMPLEOS EMPLEOS EMPLEOS



SOLICITA SERVIDORES, COCINEROS, PANADEROS Y LAVAPLATOS

Con disponibilidad de horario. Turno de tarde y debe trabajar fines de semana. Salario basado en la experiencia. Ofrecemos descuento de comida generosos y Excelentes Beneficios.

Si le interesa trabajar en un lugar de ritmo rápido y donde nuestros empleados son respetados y apreciados.

APLIQUE EN PERSONA EN EL 12509 N. LAMAR BLVD. AUSTIN, TX 78753

(512) 973-8264 IGUALDAD OPORTUNIDAD DE EMPLEO

La Posada
Mexican Restaurant

SOLICITA Meseras (hombres y mujeres) con experiencia, Bussers y cocineros linecook & dishwasher con mínimo 2 años de experiencia.

Aplicar en persona
6800 Westgate Blvd #143
(512) 444-2631

Solicito personas para trabajar en limpieza

que vivan en el área de Austin, San Marcos, Kyle, Buda, Georgetown, Lakeway, Lampasas, Oak Hill, Ect.

(512) 481-8191 con Nlna

COMPANÍA DE LIMPIEZA

busca personal bilingüe con experiencia para limpieza de construcción en el área de Bee Caves y alrededores.

\$15 POR HORA dependiendo de experiencia puede ser más. Lunes a Viernes. Debe contar con transportación, licencia de manejo y documentos legales. Informes al **(512) 796-3164**

SOLICITO PERSONAL PARA LIMPIEZA DE CASAS Y DEPARTAMENTOS

Aplicar en 2105 Justin Ln Ste 102 ATX 78757. de 9am a 4pm lun. a vie.

(512) 963-4999 (512) 506-9293 mensaje o texto

SOLICITO personal de construcción

Trabajo general, cementeros y formaleros

BUENA PAGA

Interesados llamar al

RENTA

RENTO ESPACIO PARA RV \$600 al mes, no incluye tanque séptico

BODEGA CON OFICINA \$1400 al mes. También

RENTO APTO DE 1 REC. 14531 Cameron Rd Pflugerville, TX 78660 Informes (512) 436-5118

SE RENTA CUARTO EN CASA

Aclaraciones Br Elección

La SJR 2 propone legislatura a proveer cantidad total de impuestos para fines generales de las propiedades residenciales para reflejar cualquier operaciones fijados p

La enmienda propue "La enmienda const la reducción del impuestos ad valor las escuelas pública residencial de una p reflejar cualquier r en la tasa comprimi y operaciones fijado

La SJR 2 propone ur de la exención de la p dad para fines de las

mediante de caso impugnado. Usted puede comentar los comentarios públicos por escrito dentro de 30 días desde la fecha de esta publicación en el período en la manera de exponer en los CONTACTOS DE LA AGENCIA E INFORMACIÓN en el párrafo abajo.

RESPUESTA A COMENTARIOS Y ACTIÓN DEL DIRECTOR EJECUTIVO. Después de la fecha límite de los comentarios públicos, el Director Ejecutivo considerará los comentarios y preparará una respuesta para todos los comentarios relevantes, materiales o significativos. La decisión del Director Ejecutivo en la aplicación y en la respuesta a los comentarios será aplicada a todas las personas en la lista de correo. Si no se reciben pedidos de una audiencia de caso contencioso a tiempo o si todos los pedidos han sido escudados, el Director Ejecutivo podrá dar una aprobación final de la aplicación. La respuesta a los comentarios, y la decisión del Director Ejecutivo en la aplicación será enviada a todos los que escribieron comentarios públicos o al editor en la lista de correo para esta aplicación y será puesta electrónicamente en la Base de Datos del Contencioso (DB).

Información disponible en línea. Cuando esta disponible, la respuesta del Director Ejecutivo a los comentarios le decidirá final de esta aplicación electrónica de la Comisión en: www.texas.gov, www.tceq.texas.gov, www.tceq.texas.gov/submitComments/ o deben enviarse por correo a la Texas Commission on Environmental Quality, Oficina del Secretario Oficial, MC 105, TCEQ, P.O. Box 3087, Fort Worth, Texas 76111-3087. Por favor, tenga en cuenta que cualquier información de contacto que proporcione, incluyendo su nombre, número de teléfono, dirección de correo electrónico y dirección física, se agregará al registro público de la agencia. Para más información sobre este proceso de permisos, por favor llame sin costo al Programa de Educación del Público al 1 800 887 4048. Si desea información en español, puede llamar al 1 800 887 4040.

LISTA DE CORREO. Usted puede pedir ser incluido en la lista de correo para obtener información adicional en esta aplicación mandando un correo a la Oficina del Jefe Principal en la dirección que aparece abajo.

CONTACTO E INFORMACIÓN DE LA AGENCIA. Comentarios públicos y peticiones se deben enviar electrónicamente a www.tceq.texas.gov/submitComments/ o deben enviarse por correo a la Texas Commission on Environmental Quality, Oficina del Secretario Oficial, MC 105, TCEQ, P.O. Box 3087, Fort Worth, Texas 76111-3087. Por favor, tenga en cuenta que cualquier información de contacto que proporcione, incluyendo su nombre, número de teléfono, dirección de correo electrónico y dirección física, se agregará al registro público de la agencia. Para más información sobre este proceso de permisos, por favor llame sin costo al Programa de Educación del Público al 1 800 887 4048. Si desea información en español, puede llamar al 1 800 887 4040.

Se puede obtener información adicional también de Earth Research Corporation en la dirección que aparece arriba o llamando al Dr. Thomas Dienerbach, PhD, Vicepresidente al (512) 310-6044.

Fecha de Expedición: 23 de Febrero del 2022.

añadir y a las personas que están en la lista de correo para esta solicitud. Si se reciben comentarios, el correo electrónico proporcionado anteriormente para solicitar una audiencia de caso impugnado o una reconsideración de la decisión del Director Ejecutivo. Una audiencia de caso impugnado es un procedimiento legal similar a un juicio que se realiza en un tribunal estatal de distrito.

APA SELECCIÓN UNA AGENCIA DE CASO IMPUGNADO, COMO INCLUIR EL SIGUIENTE ARTÍCULO EN SU SOLICITUD: Si usted desea solicitar una audiencia de caso impugnado o una reconsideración de la decisión del Director Ejecutivo, debe incluir en su solicitud una declaración jurada que afirma que usted está haciendo esta solicitud de buena fe y que no está haciendo esto para obtener un beneficio económico. La declaración debe incluir una declaración de que usted no está haciendo esto para obtener un beneficio económico. La declaración debe incluir una declaración de que usted no está haciendo esto para obtener un beneficio económico. La declaración debe incluir una declaración de que usted no está haciendo esto para obtener un beneficio económico.

La Comisión está planeando una audiencia de caso impugnado o una reconsideración de la decisión del Director Ejecutivo. Si usted desea solicitar una audiencia de caso impugnado o una reconsideración de la decisión del Director Ejecutivo, debe incluir en su solicitud una declaración jurada que afirma que usted está haciendo esta solicitud de buena fe y que no está haciendo esto para obtener un beneficio económico.

ACCIÓN DEL DIRECTOR EJECUTIVO. El Director Ejecutivo puede emitir la aprobación final de la solicitud a menos que se presente un comentario público o una solicitud de audiencia de caso impugnado o una solicitud de reconsideración. Si se presenta una solicitud de audiencia de caso impugnado o una solicitud de reconsideración a tiempo, el Director Ejecutivo no podrá emitir la aprobación final de la solicitud a menos que usted se presente a la Comisión de la TCEQ para su consideración en una reunión programada de la Comisión.

LISTA DE CORREO. Si usted quiere recibir una copia de esta solicitud de permiso, envíe un correo electrónico a public@tceq.texas.gov o llame al 1-800-887-4048. Si desea información en español, llame al 1-800-887-4040.

INFORMACIÓN DISPONIBLE EN LÍNEA. Para obtener detalles sobre el estado de la solicitud, visite la base de datos electrónica de los comentarios en www.tceq.texas.gov, www.tceq.texas.gov/submitComments/ o llame al 1-800-887-4048.

CONTACTO E INFORMACIÓN DE LA AGENCIA. Los comentarios y peticiones se deben enviar electrónicamente a www.tceq.texas.gov/submitComments/ o por correo a la Texas Commission on Environmental Quality, Oficina del Secretario Oficial, MC 105, TCEQ, P.O. Box 3087, Fort Worth, Texas 76111-3087.

Se puede obtener información adicional también de Earth Research Corporation en la dirección que aparece arriba o llamando al Dr. Thomas Dienerbach, PhD, Vicepresidente al (512) 310-6044.

Fecha de emisión 23 de febrero de 2022

SERVICIO

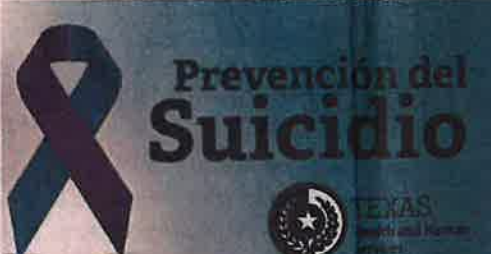
Hombre conciente a ti mismo
Movimiento Gróscico A.C.
¿Quiénes somos?
¿Hacia dónde vamos?
¿Por qué estamos aquí?
CLASES GRATIS
(512) 639-8902
(210) 291-1427

luz, agua y gas.
(512) 680-2771

SE RENTA TERRENO
para poner tralla con agua y luz
8619 Linden Road
en Del Valle, TX
Interesados llamar al
(512) 923-7326

"La emmición de imp de las escue

Publ



Prevencción del Suicidio

RECURSOS

- Llame al 2-1-1 y seleccione la opción 8, o visite el sitio 211.texas.org.
- Si llama al 911, pida hablar con alguien especializado en salud mental.
- Localice los números para situaciones de crisis de las autoridades locales de salud mental en el sitio. bit.ly/HHSmentalhealthcrisis.
- Línea Nacional de Prevencción del Suicidio: 800-273-8255 (TALK). Para más información o para chatear en línea: SuicidePrevention.Lifeline.org.
- Línea de crisis para veteranos: 800-273-8255, oprima el 1.
- Línea de mensajes de texto en casos de crisis: 741-741. Para más información: CrisisTextLine.org.
- Comuníquese con el Trevor Project (organización de ayuda para jóvenes LGBTQ) las 24 horas y los 7 días de la semana, llamando al 866-488-7386; enviando por texto la palabra "START" al 678678, o ingresando a su chat en línea en TheTrevorProject.org/get-help-now.

Application Exhibit 19

TCEQ ED and Applicant Sign-Posting Notice Correspondence

From: arloe.fontenot@exfluor.com
Sent: Tuesday, April 12, 2022 3:22 PM
To: Cara Hill; 'Joerg Windolph'
Cc: eric.bierschenk@exfluor.com
Subject: RE: Public comment on Permit Number 165848
Attachments: ExFluor E Prop Posting Public Notice 1.JPEG; ExFluor W Prop Posting Public Notice 1.JPEG; ExFluor E Posting Public Notice 1 _ Aug 17 2021.JPG; ExFluor E Posting Public Notice 1 _ July 28 2021.JPG; ExFluor W Posting Public Notice 1 _ Aug 17 2021.JPG; ExFluor W Posting Public Notice 1 _ July 28 2021.JPG

Hi Cara,

See attached pictures of the W end & E end of the property from the 1st public notice period. Also included time stamps of the pictures during that time. Let us know if anything else is needed.

Thanks,

Arloe Fontenot

EHS Manager
Exfluor Research Corp
Round Rock, Texas
C: 225-636-1010
O: 512-310-9044
exfluor.com



From: Cara Hill <Cara.Hill@Tceq.Texas.Gov>
Sent: Tuesday, April 12, 2022 1:44 PM
To: arloe.fontenot@exfluor.com; 'Joerg Windolph' <JWindolph@WAID.com>
Cc: eric.bierschenk@exfluor.com
Subject: RE: Public comment on Permit Number 165848

Hi Arloe,

Do you happen to also have pictures from the 1st public notice period? If you do, we were just wanting to add them to the file.

Thanks,
Cara

How is our customer service? www.tceq.texas.gov/customersurvey

From: arloe.fontenot@exfluor.com <arloe.fontenot@exfluor.com>
Sent: Tuesday, April 5, 2022 5:01 PM
To: Cara Hill <Cara.Hill@Tceq.Texas.Gov>; 'Joerg Windolph' <JWindolph@WAID.com>
Cc: eric.bierschenk@exfluor.com
Subject: RE: Public comment on Permit Number 165848

Hi Cara,
See signs posted on eastern & western ends of the property within 10' of the property lines.
Please reach out of if any additional concerns.

Thanks,

Arloe Fontenot
EHS Manager
Exfluor Research Corp
Round Rock, Texas
C: 225-636-1010
O: 512-310-9044
exfluor.com



From: Cara Hill <Cara.Hill@Tceq.Texas.Gov>
Sent: Monday, April 4, 2022 8:23 AM
To: 'Joerg Windolph' <JWindolph@WAID.com>; arloe.fontenot@exfluor.com
Subject: FW: Public comment on Permit Number 165848

Good morning,

I wanted to let you all know that we have received some comments on the application. I'm forwarding one indicating that the signs were not properly posted for you to look into. If you would like to view other comments, you can look up the permit in the CID database:

<https://www14.tceq.texas.gov/epic/eCID/>

Enter the permit number in the "TCEQ ID Number:" box and check the "Include all correspondence from the public on this Item:" box.

Let me know if you have questions.

Thanks,
Cara

How is our customer service? www.tceq.texas.gov/customersurvey

From: PUBCOMMENT-APD <PUBCOMMENT-APD@tceq.texas.gov>
Sent: Monday, April 4, 2022 7:45 AM
To: Cara Hill <Cara.Hill@Tceq.Texas.Gov>
Subject: FW: Public comment on Permit Number 165848

From: PUBCOMMENT-OCC <PUBCOMMENT-OCC@tceq.texas.gov>
Sent: Monday, April 4, 2022 7:43 AM
To: PUBCOMMENT-OCC2 <PUBCOMMENT-OCC2@tceq.texas.gov>; PUBCOMMENT-OPIC <PUBCOMMENT-OPIC@tceq.texas.gov>; PUBCOMMENT-ELD <PUBCOMMENT-ELD@tceq.texas.gov>; PUBCOMMENT-APD <PUBCOMMENT-APD@tceq.texas.gov>
Subject: FW: Public comment on Permit Number 165848

PM
H

From: gwyneth@txenvirolaw.com <gwyneth@txenvirolaw.com>
Sent: Friday, April 1, 2022 5:22 PM
To: PUBCOMMENT-OCC <PUBCOMMENT-OCC@tceq.texas.gov>
Subject: Public comment on Permit Number 165848

REGULATED ENTY NAME EXFLUOR RESEARCH

RN NUMBER: RN110969227

PERMIT NUMBER: 165848

DOCKET NUMBER:

COUNTY: WILLIAMSON

PRINCIPAL NAME: EXFLUOR RESEARCH CORPORATION

CN NUMBER: CN602696791

FROM

NAME: Gwyneth Lonergan

EMAIL: gwyneth@txenvirolaw.com

COMPANY: Perales, Allmon & Ice, P.C.

ADDRESS: 1206 SAN ANTONIO ST
AUSTIN TX 78701-1834

PHONE: 5124696000

FAX: 5124829346

COMMENTS: Please see the attached formal public comments, request for a public meeting, and request for a contested case hearing submitted on behalf of North San Gabriel Alliance.



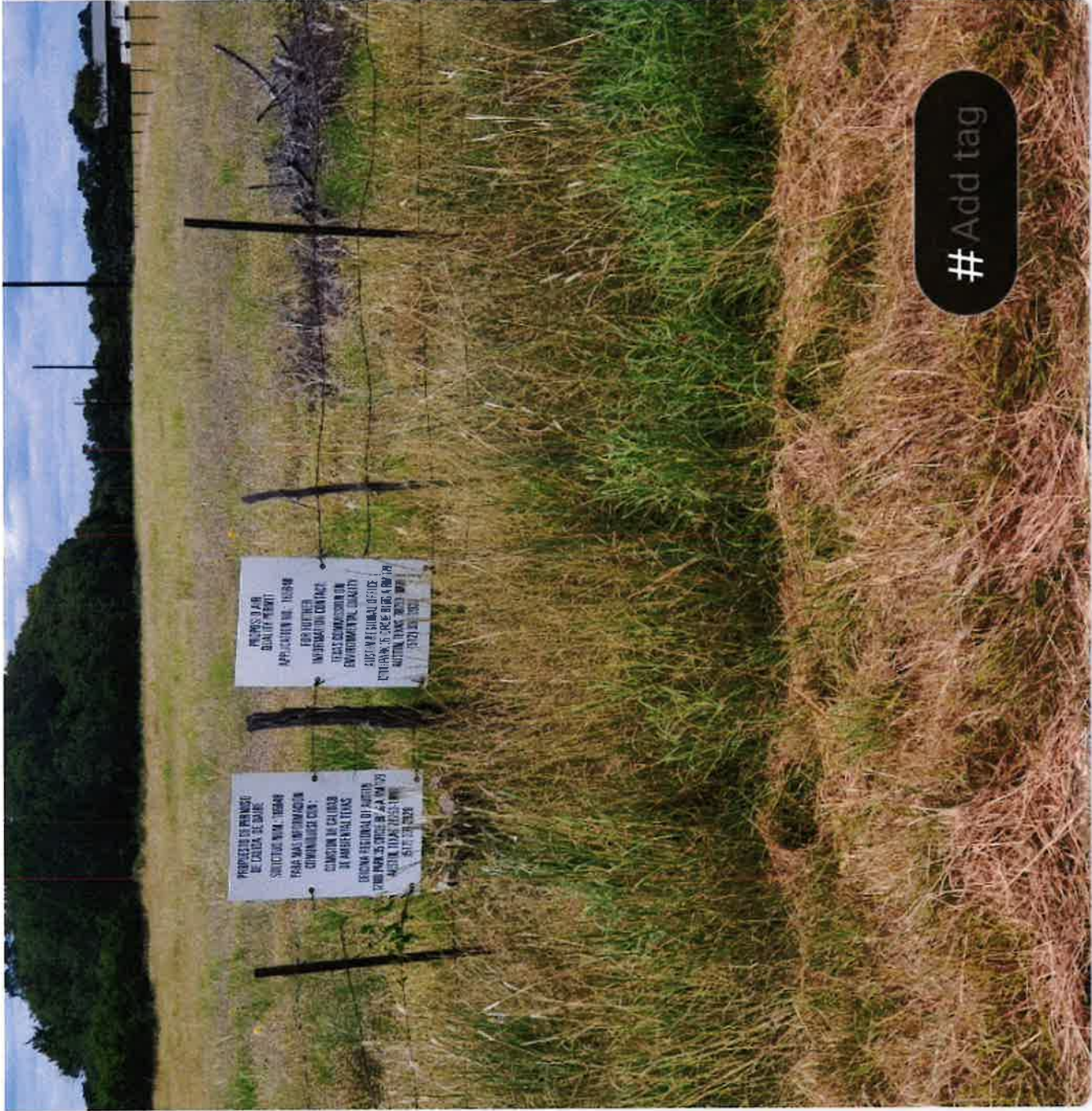
PROPOSED AIR
QUALITY PERMIT
APPLICATION NO. 165946
FOR FURTHER
INFORMATION CONTACT
TEXAS COMMISSION ON
ENVIRONMENTAL QUALITY
AUSTIN REGIONAL OFFICE
1200 PARKS CIRCLE, SUITE 1000
AUSTIN, TEXAS 78758-1000
512/261-2527

PROPUESTO DE PERMISO
DE CALIDAD DE AIRE
SOLICITUD NÚM. 165946
PARA MÁS INFORMACIÓN
COMUNIQUESE CON:
COMISIÓN DE CALIDAD
DE AMBIENTAL TEXAS
OFICINA REGIONAL DE AUSTIN
1200 PARKS CIRCLE, SUITE 1000
AUSTIN, TEXAS 78758-1000
512/261-2527



PROPUESTA DE PERMISO
DE CALIDAD DE OMBRE
SOLICITUD NUM. 165848
PARA MAS INFORMACION
COMUNIQUESE CON:
COMISION DE CALIDAD
DE AMBIENTAL TEXAS
OFICINA REGIONAL DE AUSTIN
12000 PARK 35 CIRCLE, BLDG. A, RM 179
AUSTIN, TEXAS 78735-1808
(512) 339-2925

PROPOSED AIR
QUALITY PERMIT
APPLICATION NO. 165848
FOR FURTHER
INFORMATION CONTACT:
TEXAS COMMISSION ON
ENVIRONMENTAL QUALITY
AUSTIN REGIONAL OFFICE
12000 PARK 35 CIRCLE, BLDG. A, RM 179
AUSTIN, TEXAS 78735-1808
(512) 339-2925



PROYECTO DE PROMOCIÓN
DE CALIDAD DE VIDA
SUSTENTABLE PARA
PARA UNA INVESTIGACIÓN
COPORATIVA CON:
COMUNIDAD DE CALLE
DE AMÉRICA DEL SUR
ECONOMÍA REGIONAL DE AMÉRICA
DEL SUR PARA LAS CIUDADES DE LA AMÉRICA
DEL SUR, TEXAS, TEXAS, TEXAS
512.338.2828

PROYECTO DE
CALIDAD DE VIDA
SUSTENTABLE
PARA UNA INVESTIGACIÓN
COPORATIVA CON:
COMUNIDAD DE CALLE
DE AMÉRICA DEL SUR
ECONOMÍA REGIONAL DE AMÉRICA
DEL SUR PARA LAS CIUDADES DE LA AMÉRICA
DEL SUR, TEXAS, TEXAS, TEXAS
512.338.2828

Add tag

20210817_142345.jpg



20210728_095558.jpg

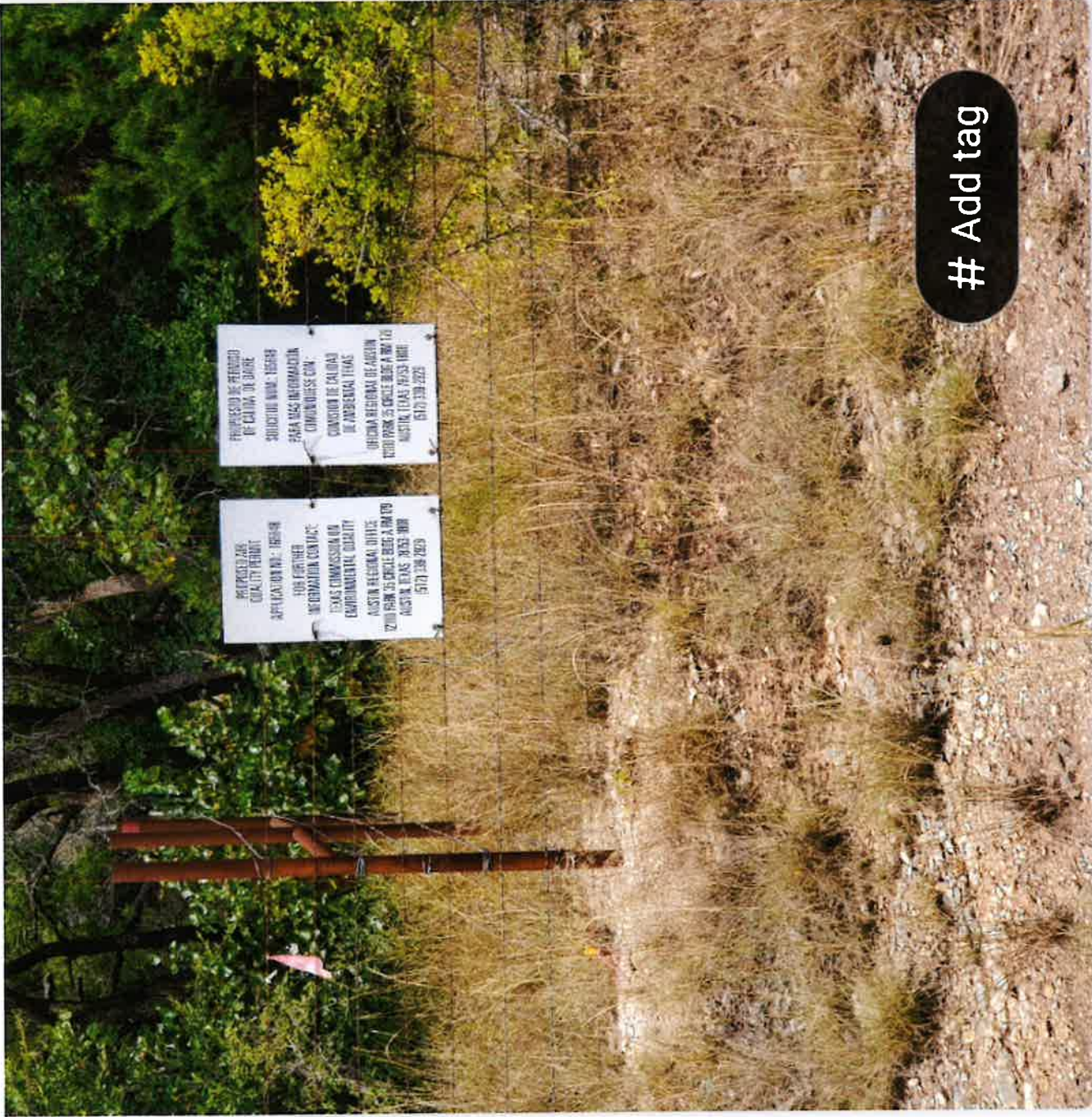
8.99 MB 4032x3024

/Internal storage/DCIM/Exflour



Location





PROCESO DE PERMISO
DE CALIDAD DE AGUA
SOLICITE NUNCA: HERRER
PARA MAS INFORMACION
CONTACTE NUESTRO
COMUNICADOR
COMISION DE CALIDAD
DE AMBIENTE TEXAS
OFICINA REGIONAL DE AUSTIN
1200 PARK 35 SOUTH BEEB A, RAY RD
AUSTIN TEXAS 78753-1000
512.389.2829

PROCESO DE PERMISO
DE CALIDAD DE AGUA
SOLICITE NUNCA: HERRER
PARA MAS INFORMACION
CONTACTE NUESTRO
COMUNICADOR
COMISION DE CALIDAD
DE AMBIENTE TEXAS
OFICINA REGIONAL DE AUSTIN
1200 PARK 35 SOUTH BEEB A, RAY RD
AUSTIN TEXAS 78753-1000
512.389.2829

Add tag

20210817_142227.jpg



20210728_100547.jpg

7.18 MB 4032x3024

/Internal storage/DCIM/Exflour



Location



PERALES, ALLMON & ICE, P.C.

ATTORNEYS AT LAW

1206 San Antonio Street
Austin, Texas 78701
(512) 469-6000 • (512) 482-9346 (facsimile)
info@txenvirolaw.com

Of Counsel:
David Frederick
Richard Lowerre
Brad Rockwell

April 1, 2022

Ms. Laurie Gharis
Office of the Chief Clerk
Texas Commission on Environmental Quality
MC-105
P.O. Box 13087
Austin, Texas 78711-3087

via: TCEQ Comments Online

Re: Public Comments, Request for a Public Meeting, and Request for a Contested Case Hearing on the Application of Exflur Research Corporation for Air New Source Review Permit No. 165848.

Dear Ms. Gharis:

On behalf of North San Gabriel Alliance, I am submitting these formal public comments, request for a public meeting, and request for a contested case hearing on the application by Exflur Research Corporation (“Exflur”) for Permit No. 165848 (the “Application”) that would authorize the construction of the Exflur Research facility to be located at 1100 County Road 236, Florence, Williamson County, Texas 76527.

North San Gabriel Alliance (“NSGA” or the “Alliance”) is a Texas non-profit organization that works to protect the natural environment, homes, crops, animals, and property of people who live, work, farm, ranch, and recreate in the area of the North Fork of the San Gabriel River, in Williamson and Burnet Counties, Texas. The Alliance is a membership organization, with members who own property and live in the immediate vicinity of the site of the proposed Exflur facility, including those within one mile of the site. These members possess a justiciable interest that will be impacted by the proposed facility in a manner not shared by the general public.

For the reasons identified below, Exflur’s Application should be denied. In the alternative, the Exflur Application should be returned for failure to comply with the Commission’s notice requirements.

I. North San Gabriel Alliance's Comments

a. Exflur has failed to demonstrate compliance with TCEQ public notice requirements.

As an initial matter, there is no evidence that Exflur complied with public notice requirements in the Commission's rules. Based on information known to members of the Alliance, it is likely that Exflur failed to comply with the sign-posting requirement found in Texas Health and Safety Code (THSC), Section 382.056(c) and Title 30, Texas Administrative Code (TAC), Rule 39.604.

In accordance with THSC, Chapter 382, the Commission's rules impose strict requirements on sign-posting. The sign(s) must be placed at the site of the proposed facility declaring the filing of an application for a permit and stating the manner in which the Commission may be contacted for further information.¹ The sign(s) must consist of dark lettering on a white background and must be no smaller than 18 inches by 28 inches with letters no less than 1 ½ inches in size.² The sign(s) must be headed by prescribed wording and include particular wording and information.³

Additionally, the sign(s) "must be in place by the date of publication of the Notice of Receipt of Application and Intent to Obtain Permit [NORI] and must remain in place and legible throughout that public comment period."⁴ "Each sign placed at the site must be located within ten feet of every property line paralleling a public highway, street, or road. Signs must be visible from the street. . . ."⁵ Finally, alternative language sign posting is required whenever alternative language newspaper notice would be required.⁶

It is clear from the Commission's language that the intent behind specific posting requirements is to ensure that the signs are seen by those passing by the proposed site, so that those individuals have the opportunity to participate in the permitting processing, as provided for in THSC, Chapter 382.

Affidavits submitted by Exflur assert that the NORI was published in the *Williamson County Sun* on July 28, 2021 and in the *El Mundo Newspaper* on July 29, 2021. Assuming these records are accurate, this means that two signs—one in English and one in Spanish—were required to have been placed at the site of the proposed Exflur facility by July 28, 2021 and to have remained in place until at least August 30, 2021.

¹ 30 TAC § 39.604(a).

² *Id.* at 39.604(a)(1).

³ *Id.* at 39.604(a)(2).

⁴ *Id.* at 39.604(b).

⁵ *Id.* at 39.604(c).

⁶ *Id.* at 39.604(e).

It is worth mentioning that Agency instructions recommend that the signs remain in place until 30 days after the last newspaper publication of the second notice.⁷ In this case, Exflur affidavits assert that the second notice (the NAPD) was published in the *Williamson County Sun* on March 6, 2022 and in *El Mundo Newspaper* on March 10, 2022, meaning the *recommended* timeframe for keeping the sign posted would be ongoing and until at least April 9, 2022.

There is no actual evidence that Exflur posted the requisite signs by July 28, 2021 and ensured they remained in place for 30 days following, or that the signs complied with the Commission's strict rules regarding form, content, and location. Maude McCormick Allen, a local resident with a large, extended family, many of whom also live nearby, attested that, despite her driving past the site of the proposed Exflur facility about a dozen times during the 30-day time period in July and August 2021, she never observed a TCEQ sign posted on the Exflur property.⁸

Ms. Allen is a retired rural USPS mail carrier, who has seen at least three other TCEQ signs posted in other locations while on her mail route in the last four to five years.⁹ She is very familiar with the area around the site of the proposed Exflur facility, tries to be aware of changes in her surroundings, and observed other actual changes that occurred on the Exflur site around the time that the sign posting would have been required.¹⁰ Thus, she would have likely recognized a TCEQ sign had one been posted on the Exflur property in a place that was 100 percent visible from the street.

After Ms. Allen learned about the proposed Exflur facility, she drove to the site and observed one sign posted at the Exflur gate, which appeared to be an 8 ½-inch by 11-inch sign regarding permitting through Williamson County.¹¹ Ms. Allen's photos from March 15, 2022 and March 30, 2022 depict the sign posted on a flat surface to the left (west side) of the Exflur gate.¹² The content of the Williamson County sign is not legible from the

⁷ **Attachment 1**, Declaration of Administrative Completeness (July 14, 2021) (from TCEQ to Exflur, providing instructions and examples to comply with notice requirements, including Example C, Sign Posting, and instructing Exflur; "The sign template enclosed (*Example C*) is an example only. Read the sign template carefully and notify the TCEQ if it has an error or omissions. It is your responsibility to verify that the appropriate information pertaining to your application is accurate. Any changes to the text prepared by the TCEQ must be approved by the agency.")

⁸ **Attachment 2**, Affidavit of Maude McCormick Allen, ¶¶ 4, 7, 8, 11 (Mar. 30, 2022).

⁹ *Id.* at ¶¶ 5-6.

¹⁰ *Id.* at ¶¶ 4, 9-10.

¹¹ *Id.* at ¶¶ 12-13.

¹² *Id.* at Exhibits A-B.

street and there are no other signs visible in these two photos; Ms. Allen also attests that the Williamson County sign was the only sign that was posted in that location at that time.¹³

Ms. Allen's observations cast serious doubt on whether the requisite sign was posted during the requisite time period. Her observations also cast doubt as to whether the sign, if posted, was posted in a location that was within ten feet of the property line paralleling County Road 236 and was visible from the street, as is strictly required by Commission Rule 39.604(c).

Ms. Allen's photos depict a flat surface to the left (West side) of the Exflur gate that Exflur is apparently using for posting other permit-related signs or notices. But this location is not within ten feet of the property line paralleling County Road 236. Review of Williamson County Appraisal District's (WCAD) website and use of the WCAD's measuring tools indicate that this location is nearly 60 feet from the property line paralleling County Road 236.¹⁴ Even measuring from Exflur's fenceline along the road, the sign posting area is approximately 46 feet back from the fenceline. Ms. Allen's personal observations are consistent with these estimates.¹⁵ Therefore, even if Exflur posted a sign that met all other criteria, posting in this location would not comply with the Commission's rules, and could likely be a reason that no signs were observed during the initial comment period.

It is also worth mentioning that nothing in the public records provided by TCEQ staff show correspondence with Exflur that would indicate that Exflur followed the instructions provided by the TCEQ, particularly that Exflur was to read the sign template provided carefully and "notify the TCEQ if it has an error or omissions."¹⁶ TCEQ instructed Exflur to have any changes to the text prepared by the TCEQ to be approved by the agency.¹⁷ Changes would have likely been necessary, because the Application is being processed in an expedited manner, and pursuant to Commission rules, "[w]hen existing public notice requirements must be met and the applicant pays a surcharge as described in §101.601 of this title (relating to Surcharge), the applicable public notice must indicate that the application is being processed in an expedited manner."¹⁸ In addition, as was already established, Exflur was required to post a Spanish-language sign as well.

¹³ *Id.* at ¶ 13, Exhibits A-B.

¹⁴ See **Attachment 3**, created from the Williamson County Appraisal District's website, showing Parcel Identification Number R590750 for property owned by Exflur Research Corporation, available at: <https://portico.mygisonline.com/html5/?viewer=williamsontx> (last visited April 1, 2022).

¹⁵ See **Attachment 2**, Allen Affid. at ¶ 16.

¹⁶ **Attachment 1** at 10.

¹⁷ *Id.*

¹⁸ 30 TAC § 101.602.

In light of all of this information (or lack thereof) and concerns, Exflur should provide evidence of proper sign-posting, and if Exflur cannot, or in the alternative, Exflur must be required to provide initial notice (first notice of NORI) again, which would have the effect of re-opening the initial comment period.

b. Exflur's apparent failure to comply with the notice requirements has harmed local residents.

Often in permitting matters before the Commission, notice is improper and not in accordance with the Commission's rules, but neighbors somehow receive actual notice in a timely fashion anyway. In those instances, the failure to provide proper notice does not necessarily cause any harm. That is not the case here.

In this matter, Exflur's Application is being processed as a minor NSR permit application. Therefore, hearing requests were only timely if received in the initial 30-day comment period (by August 30, 2021). The Application was submitted to the TCEQ on July 9, 2021, and is being processed in an expedited manner. Many local residents did not receive actual notice of the proposed Exflur facility until early 2022, during the second notice and comment period.

Exflur acknowledges that its facility, if built, would emit several contaminants, including hydrogen fluorides, carbon monoxide, hazardous air pollutants, nitrogen oxides and organic compounds. Improper notice during the initial notice and comment period has effectively denied local residents their right to contest the permit Application and Exflur's proposal to emit hazardous air pollutants and other contaminants into their local environment. Because Exflur has not shown notice was proper, and since Exflur's apparent failure to comply with the notice requirements has harmed local residents and affected their right to a hearing, Exflur must be required to provide initial notice (first notice of NORI) again, which would have the effect of re-opening the initial comment period.

II. North San Gabriel Alliance's Request for a Public Meeting

North San Gabriel Alliance requests a public meeting. The Alliance was formed only recently when local residents learned of the proposed Exflur facility. As previously discussed, because public notice was deficient, local residents learned of the Application belatedly; however, the Alliance believes there is substantial public interest in the Application. This is a rural area, but one that is home to many residents who have lived in the area their entire lives and on land that has been in their family for generations.

In addition to residences, there are known historical sites and structures in the area, cattle, livestock, and crops that are dependent on the land, and tributaries on and near the Exflur site that drain across several properties to the North Fork of the San Gabriel River.

A public meeting would allow the community the opportunity to ask questions about the Application of Exflur and of TCEQ staff. The Alliance requests that the public meeting be held in person and in the local community but with a remote participation option for those who may have mobility or health concerns (especially in light of the ongoing Covid-19 pandemic) considering many in the community are elderly.

III. North San Gabriel Alliance's Request for a Contested Case Hearing

North San Gabriel Alliance requests a contested case hearing. As previously mentioned, NSGA is a Texas non-profit organization that works to protect the natural environment, homes, crops, animals, and property of people who live, work, farm, ranch, and recreate in the area of the North Fork of the San Gabriel River, in Williamson and Burnet Counties, Texas. The Alliance is a membership organization, with members who own property and live in the immediate vicinity of the site of the proposed Exflur facility, including those within one mile of the site. These members possess a justiciable interest that will be impacted by the proposed facility in a manner not shared by the general public.

One such member of NSGA is Patricia McCormick Mulvihill, who is Trustee^{*} for approximately 31 acres of property owned by her children located at 1050 County Road 208, Florence, Texas 76527, about 0.67 miles north of the Exflur property. Ms. Mulvihill and her family and guests frequently use this property for nature walks, wildlife observation, bird watching, outdoor recreation and exercise, rest and relaxation, and mental health retreats. Ms. Mulvihill intends in the near future to build a residence home to be used in retirement. This home site has been planned for many years but will not be possible if threatened by toxic chemicals. Ms. Mulvihill's current and future use will be impacted by adverse air quality and the danger that going outside could expose her and her family members and guests to harmful chemical pollutants.

Another NSGA member is Bryce Philip McCormick, whose primary residence at 1250 County Road 208, Florence, Texas 76527 sits on approximately 10 acres and who owns and ranches an additional 65 acres of property (the "Ranch") adjacent to Ms. Mulvihill's property. Mr. McCormick's home and Ranch property are approximately 0.90 miles north of the Exflur property. He uses his property as his primary residence and raises cattle and goats on the Ranch for meat consumption. In addition, the Ranch is home to several charitable events each year, some of which are attended by more than 100 guests. Mr. McCormick's home and use of his Ranch will be negatively impacted by adverse air quality and the danger that going outside could expose him and his family members and guests to harmful chemical pollutants.

IV. Conclusion

For all these reasons, North San Gabriel Alliance respectfully requests that the Application be denied. If not denied, the Application should be returned for failure to comply with the Commission's notice requirements. The Alliance also requests a public meeting and a contested case hearing. We reserve the right to supplement these comments.

Members of North San Gabriel Alliance may be contacted through my firm at the address and telephone number provided below.

Respectfully submitted,

/s/ Lauren Ice

Lauren Ice

PERALES, ALLMON & ICE, P.C.

1206 San Antonio Street

Austin, Texas 78701

Tel. (512) 469-6000

Fax (512) 482-9346

lauren@txenvirolaw.com

Attorney for North San Gabriel Alliance

ATTACHMENT 1

Jon Niermann, *Chairman*
Emily Lindley, *Commissioner*
Bobby Janecka, *Commissioner*
Toby Baker, *Executive Director*



TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

Protecting Texas by Reducing and Preventing Pollution

July 14, 2021

DR THOMAS BIERSCHENK PHD
VICE PRESIDENT
EXFLUOR RESEARCH CORPORATION
2350 DOUBLE CREEK DR
ROUND ROCK TX 78664-3801

Re: Declaration of Administrative Completeness Small Business Stationary Source Permit Application
Permit Number: 165848
Exfluor Research Corporation
Exfluor Research
Florence, Williamson County
Customer Reference Number: CN602696791
Regulated Entity Number: RN110969227

Dear Dr. Bierschenk:

The Texas Commission on Environmental Quality (TCEQ) has declared the above-referenced application, received on July 9, 2021, administratively complete on July 14, 2021. We also understand you have represented that this application is for a small business stationary source.

You are now required to publish notice of your proposed activity. To help you meet the regulatory requirements associated with this notice, we have included the following items:

- Notices for Newspaper Publication (Examples A)
- Sign Posting Example (Example C)
- Public Notice Checklist
- Instructions for Public Notice
- Affidavit of Publication for Air Permitting (Form TCEQ-20533) and
- Alternative Language Affidavit of Publication for Air Permitting (Form TCEQ-20534)
- Web link to download Public Notice Verification Form (refer to Public Notice Instructions)
- Notification List

Please note that it is very important that you follow all directions in the enclosed instructions. If you do not, you may be required to republish the notice. Some common errors are the unauthorized changing of notice wording or font, omission of air contaminants, and inaccurate plant site location information represented in the application. Additional information can be found at www.tceq.texas.gov/permitting/air/bilingual/how1_2_pn.html or **if you have any questions, please contact us before you proceed with publication.**

A "Public Notice Checklist" is enclosed which notes the time limitations for each step of the public notice process. **The processing of your application may be delayed if these time limitations are not met (i.e.; submitting proof of publication of the notice within 10 business days after publication, affidavits of publication within 30 calendar days after the date of publication, and public notice verification form within 10 business days after the end of the designated comment period).** This checklist should be used as a tool in conjunction with the enclosed, detailed instructions.

P.O. Box 13087 · Austin, Texas 78711-3087 · 512-239-1000 · tceq.texas.gov

How is our customer service? tceq.texas.gov/customersurvey
printed on recycled paper

APP-00518

Dr. Thomas Bierschenk PHD
Page 2
July 14, 2021

Re: Permit: 165848

If you do not comply with all requirements described in the instructions, the TCEQ cannot continue processing the application and may take other actions. Please note that as your application undergoes the technical review, we may request additional information.

If you have any questions regarding publication requirements, please contact the Office of the Chief Clerk at (512) 239-3300. If you have any other questions, please contact Mr. Steven Piper at (512) 239-1589.

Sincerely,



Johnny D. Bowers, Team Leader
Air Permits Initial Review Team
Air Permits Division
Texas Commission on Environmental Quality

Enclosures

cc: Air Section Manager, Region 11 - Austin
Air Permits Section Chief, New Source Review Section (6PD-R), U.S. Environmental Protection Agency, Region 6, Dallas

Project Number: 331049

TEXAS COMMISSION ON ENVIRONMENTAL QUALITY



EXAMPLE A

NOTICE OF RECEIPT OF APPLICATION AND INTENT TO OBTAIN AIR PERMIT

PROPOSED AIR QUALITY PERMIT NUMBER 165848

APPLICATION Exflur Research Corporation, has applied to the Texas Commission on Environmental Quality (TCEQ) for:
Issuance of Permit 165848

This application would authorize construction of the Exflur Research facility located at 1100 County Road 236, Florence, Williamson County, Texas 76527. This application is being processed in an expedited manner, as allowed by the commission's rules in 30 Texas Administrative Code, Chapter 101, Subchapter J. This link to an electronic map of the site or facility's general location is provided as a public courtesy and not part of the application or notice. For exact location, refer to application. http://www.tceq.texas.gov/assets/public/hb610/index.html?lat=30.791111&lng=-97.904166&zoom=13&type=r_ The facility will emit the following contaminants: hydrogen fluorides, carbon monoxide, hazardous air pollutants, nitrogen oxides and organic compounds.

This application was submitted to the TCEQ on July 9, 2021. The application will be available for viewing and copying at the TCEQ central office, the TCEQ Austin regional office, and the Eula Hunt Beck Florence Public Library, 207 East Main Street, Florence, Williamson County, Texas beginning the first day of publication of this notice. The facility's compliance file, if any exists, is available for public review in the Austin regional office of the TCEQ.

The executive director has determined the application is administratively complete and will conduct a technical review of the application.

PUBLIC COMMENT/PUBLIC MEETING You may submit public comments, or request a public meeting or a contested case hearing to the Office of the Chief Clerk at the address below. The TCEQ will consider all public comments in developing a final decision on the application. After the deadline for public comments, the executive director will prepare a response to all public comments.

The purpose of a public meeting is to provide the opportunity to submit comments or ask questions about the application. A public meeting about the application will be held if the executive director determines that there is a significant degree of public interest in the application, if requested by an interested person, or if requested by a local legislator. A public meeting is not a contested case hearing.

After technical review of the application is complete, the executive director may prepare a draft permit and will issue a preliminary decision on the application. Notice of Application and Preliminary Decision for an Air Quality Permit will then be published and mailed to those who made comments, submitted hearing requests or are on the mailing list for this application. That notice will contain the final deadline for submitting public comments.

OPPORTUNITY FOR A CONTESTED CASE HEARING You may request a contested case hearing. A contested case hearing is a legal proceeding similar to a civil trial in state district court. A contested case hearing will only be granted based on disputed issues of fact that are relevant and material to the Commission's decision. Further, the Commission will only grant a hearing on those issues submitted during the public comment period and not withdrawn. **The deadline to submit a request for a contested case hearing is 30 days after newspaper notice is published. If a request is timely filed, the deadline for requesting a contested case hearing will be extended to 30 days after the mailing of the response to comments.**

A person who may be affected by emissions of air contaminants from the facility is entitled to request a hearing. If requesting a contested case hearing, you must submit the following: (1) your name (or for a group or

association, an official representative), mailing address, and daytime phone number; (2) applicant's name and permit number; (3) the statement "[I/we] request a contested case hearing"; (4) a specific description of how you would be adversely affected by the application and air emissions from the facility in a way not common to the general public; (5) the location and distance of your property relative to the facility; (6) a description of how you use the property which may be impacted by the facility; and (7) a list of all disputed issues of fact that you submit during the comment period. If the request is made by a group or an association, one or more members who have standing to request a hearing must be identified by name and physical address. The interests the group or association seeks to protect must also be identified. You may also submit your proposed adjustments to the application/permit which would satisfy your concerns.

If a hearing request is timely filed, following the close of all applicable comment and request periods, the Executive Director will forward the application and any requests for contested case hearing to the Commissioners for their consideration at a scheduled Commission meeting. The Commission may only grant a request for a contested case hearing on issues the requestor submitted in their timely comments that were not subsequently withdrawn. **If a hearing is granted, the subject of a hearing will be limited to disputed issues of fact or mixed questions of fact and law relating to relevant and material air quality concerns submitted during the comment period.** Issues such as property values, noise, traffic safety, and zoning are outside of the Commission's jurisdiction to address in this proceeding.

MAILING LIST In addition to submitting public comments, you may ask to be placed on a mailing list to receive future public notices for this specific application by sending a written request to the Office of the Chief Clerk at the address below.

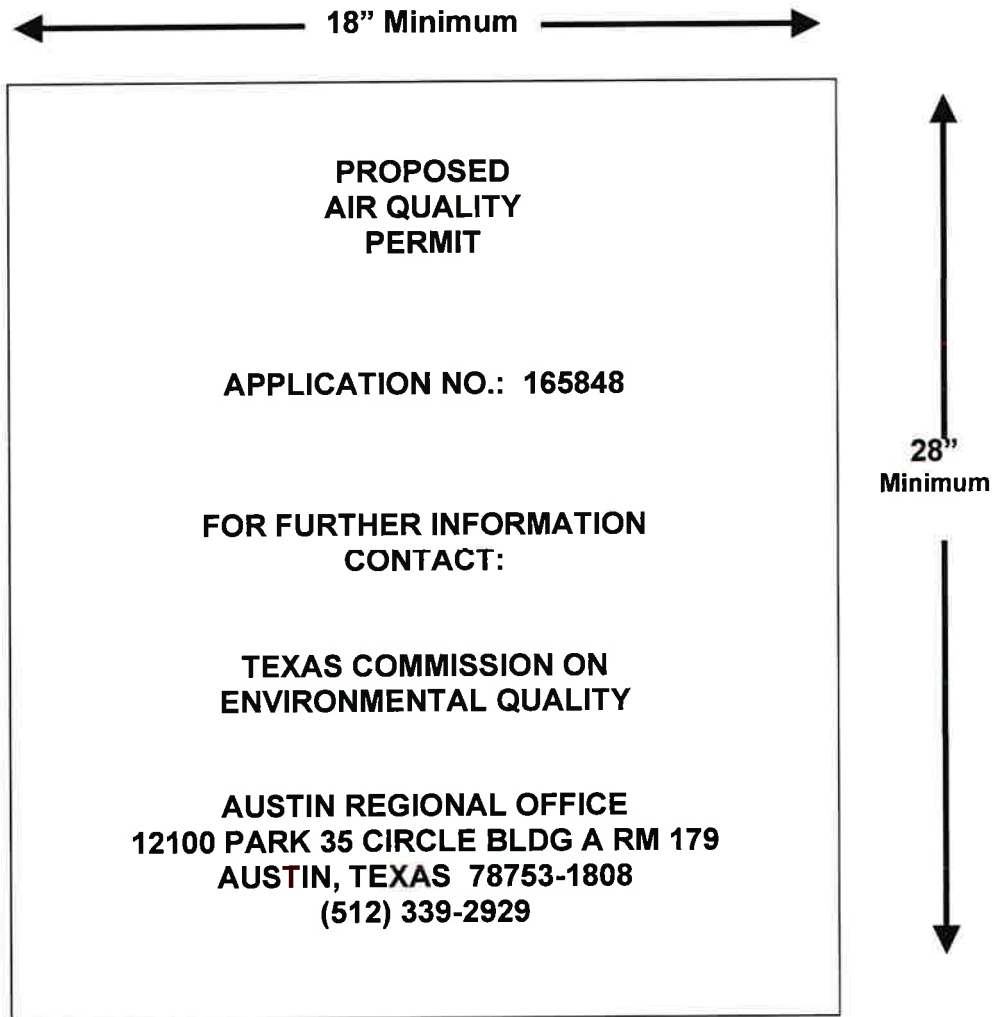
AGENCY CONTACTS AND INFORMATION Public comments and requests must be submitted either electronically at www14.tceq.texas.gov/epic/eComment/, or in writing to the Texas Commission on Environmental Quality, Office of the Chief Clerk, MC-105, P.O. Box 13087, Austin, Texas 78711-3087. Please be aware that any contact information you provide, including your name, phone number, email address and physical address will become part of the agency's public record. For more information about this permit application or the permitting process, please call the Public Education Program toll free at 1-800-687-4040. Si desea información en Español, puede llamar al 1-800-687-4040.

Further information may also be obtained from Exflur Research Corporation, 2350 Double Creek Drive, Round Rock, Texas 78664-3801 or by calling Dr. Thomas Bierschenk, PHD, Vice President at (512) 310-9044.

Notice Issuance Date: July 14, 2021

Example C
Sign Posting

Sign(s) must be in place on day of publication of first newspaper notice and must remain in place and the lettering must be legible during that designated comment period (30 days). It is recommended that the signs remain in place until 30 days after the last newspaper publication of the second notice (either English or alternate language notice, whichever is later). Note - The information shown is an example only. It is your responsibility to verify that the appropriate information pertaining to your application is accurate. Each sign placed at the site must be located within 10 feet of each (every) property line paralleling a public highway, street or road. Signs must be visible from the street and spaced at not more than 1,500-foot intervals. A minimum of one sign, but not more than three signs shall be required along any property line paralleling a public highway, street, or road.



Sign(s) must be placed at whatever height above the ground is necessary for sign(s) to be 100% visible from the street.

WHITE BACKGROUND WITH BLACK LETTERS

All lettering must be no less than 1-1/2 inch block printed capitals.

Public Notice Checklist
Notice of Receipt of Application and Intent to Obtain Permit
(1st Notice)

The following tasks must be completed for public notice. If publication in an alternative language is required, please complete the tasks for both the English and alternative language publications. Detailed instructions are included in the "Instructions for Public Notice" section of this package.

Within 30 calendar days after date of administrative completeness letter
<p>Publish <i>Notice of Receipt of Application and Intent to Obtain Permit</i></p> <ul style="list-style-type: none">- Example A must be published in "public notice" section of newspaper. Review for accuracy prior to publishing.- As part of the expedited permitting process, it is recommended that you publish immediately. <p>Provide copy of application at a public place for review and copying. Keep it there until end of the designated comment period.</p> <p>Prepare signs.</p>
First day of newspaper publication
<p>Review published newspaper notice for accuracy. If errors, contact Air Permits Division.</p> <p>Post signs and keep them up for duration of the designated comment period (see Example C).</p> <p>Ensure copy of application is at the public place.</p>
Within 10 business days after date of publication
<p>Proof of publication showing publication date and newspaper name should be emailed to PROOFS@tceq.texas.gov or mailed to:</p> <p style="padding-left: 40px;">Texas Commission on Environmental Quality Office of the Chief Clerk, MC-105 Attn: Notice Team / AIR Expedited Permitting P.O. Box 13087 Austin, Texas 78711-3087</p> <p>Mail or email, as instructed, photocopies of newspaper clippings showing publication date and newspaper name to persons listed on <i>Notification List</i></p>
Within 30 calendar days after date of publication
<p>Affidavit of publication for air permitting and alternative language affidavit of publication for air permitting (if applicable) should be emailed to PROOFS@tceq.texas.gov or mailed to:</p> <p style="padding-left: 40px;">Texas Commission on Environmental Quality Office of the Chief Clerk, MC-105 Attn: Notice Team / AIR Expedited Permitting P.O. Box 13087 Austin, Texas 78711-3087</p> <p>Mail or email, as instructed, photocopies of affidavits to persons listed on <i>Notification List</i></p>
Within 10 business days after end of the designated comment period
<p>Public Notice Verification Form should be emailed to PROOFS@tceq.texas.gov or mailed to:</p> <p style="padding-left: 40px;">Texas Commission on Environmental Quality Office of the Chief Clerk, MC-105 Attn: Notice Team / AIR Expedited Permitting P.O. Box 13087 Austin, Texas 78711-3087</p> <p>Mail or email, as instructed, photocopies of Public Notice Verification Form to persons listed on <i>Notification List</i></p>

TEXAS COMMISSION ON ENVIRONMENTAL QUALITY



Instructions for Public Notice For New Source Review Small Business Stationary Source Air Permit

Notice of Receipt of Application and Intent to Obtain Permit

Your application has been declared administratively complete and now you must comply with the following instructions:

Review Notice

Included in the notice is all of the information which the commission believes is necessary to effectuate compliance with applicable public notice requirements. Please read it carefully and notify the Texas Commission on Environmental Quality (TCEQ) immediately if it contains any errors or omissions. You are responsible for ensuring the accuracy of all information published. You may not change the text of the notice without prior approval from the TCEQ.

Newspaper Notice

- You must publish the enclosed *Notice of Receipt of Application and Intent to Obtain Permit* within **30 calendar days** after the date of administrative completeness. As part of the expedited permitting process, it is recommended that you publish immediately. Refer to the cover letter for the date of administrative completeness.
- You must publish the enclosed *Notice of Receipt of Application and Intent to Obtain Permit* at your expense, in a newspaper that is of general circulation in the municipality where the facility is or will be located. If the facility is not located within a municipality, the newspaper should be of general circulation in the municipality nearest to the location or proposed location.
- You must publish this notice in one issue of any applicable newspaper.
- You will find two example notices enclosed in this package. *Example A* must be published in the "public notice" section of the newspaper. The phrase "Example A" is not required to be published
- The bold text of the enclosed notice **must** be printed in the newspaper in a font style or size that distinguishes it from the rest of the notice (i.e., **bold**, *italics*). **Failure to do so may require re-notice.**

Alternative Language Notice

In certain circumstances, applicants for air permits must complete notice in alternative languages.

- Public notice rules require the applicant to determine whether a bilingual program is required at either the elementary or middle school nearest to the facility or proposed facility location. Bilingual education programs are determined on a district-wide basis. When students who are required to attend either school are eligible to be enrolled in a bilingual education program, some alternative language notice is required (signs, or signs and newspaper notice).

- Since the school district, and not the schools, must provide the bilingual education program, these programs do not have to be located at the elementary or middle school nearest to the facility or proposed facility to trigger the alternative language notice requirement. If there are students who would normally attend the nearest schools eligible to be taught in a bilingual education program at a different location, alternative language notice is required.
- If triggered, publication of alternative language notices must be made in a newspaper or publication primarily printed in each language taught in the bilingual education program. This notice is required if such a newspaper or publication exists in the municipality or the county where the facility is or will be located.
- The applicant must demonstrate a good faith effort to identify a newspaper or publication in the required language. If a newspaper or publication of general circulation published at least once a month in such language cannot be found, publishing in that language is not required, but signs must still be posted adjacent to each English language sign.
- Publication in an alternative language section or insertion within an English language newspaper does not satisfy these requirements.
- The applicant has the burden to demonstrate compliance with these requirements. You must fill out the **Public Notice Verification Form (Form TCEQ-20244)** indicating your compliance with the requirements regarding publication in an alternative language. **This form is available at www.tceq.texas.gov/permitting/air/nav/air_publicnotice.html.**
- It is suggested the applicant work with the local school district to do the following:
 - (a) determine if a bilingual program is required in the district;
 - (b) determine which language is required by the bilingual program;
 - (c) locate the nearest elementary and middle schools; and
 - (d) determine if any students attending either school are eligible to be enrolled in a bilingual educational program.
- **If you determine that you must meet the alternative language notice requirements, you are responsible for ensuring that the publication in the alternative language is complete and accurate in that language. Spanish notice templates are available through the Air Permits Division Web site at www.tceq.texas.gov/permitting/air/nav/air_publicnotice.html. All italic notes should be replaced with the corresponding Spanish translations for the specific application and published in the alternative language publication.**
- If you are required to publish notice in a language other than Spanish, you must translate the entire public notice at your own expense.

Public Comment Period

- The public comment period should last at least **30 calendar days**.
- The comment period will be longer if the last day of the public comment period ends on a weekend or a holiday. In this case, the comment period will end on the next business day.
- The comment period for the permit may lengthen depending on whether a public meeting is held. If a public meeting is held, the comment period will be extended to the later of either the date of the public meeting or the end of the second notice period.

Proof of Publication

- Check each publication to ensure that the articles were accurately published. If a notice was not published correctly you may be required to republish.
- For each newspaper in which you published, you must submit proof of publication that shows the notice, the date of publication, and the name of the newspaper to the Office of the Chief Clerk within **10 business days** after the date of publication. Acceptable proofs of publication are 1) copies of the published notice or 2) the newspaper clippings of the published notice. If you choose to submit copies of the published notice to the Office of the Chief Clerk, copies must be on standard-size 8½" x 11" paper and must show the actual size of the published notice (do not reduce the image when making copies). Published notices longer than 11" must be copied onto multiple 8½" x 11" pages. Please note, submitting a copy of your published notice could result in faster processing of your application. It is recommended that you maintain newspaper clippings or tear sheets of the notice for your records.
- You must submit an **affidavit of publication for air permitting and alternate language affidavit of publication for air permitting (if applicable)** to the Office of the Chief Clerk within **30 calendar days** after the date of publication. **You must use the enclosed affidavit forms.** The affidavits must clearly identify the applicant's name and permit number. You are encouraged to submit the affidavit with the proof of publication described above.
- You must submit the **Public Notice Verification Form (Form TCEQ-20244)** to the Office of the Chief Clerk within **10 business days** of the end of this public comment period. You must use this form to certify that you have met bilingual notice requirements. **This form is available at www.tceq.texas.gov/permitting/air/nav/air_publicnotice.html.**
- The affidavits of publication, **Public Notice Verification Form, and acceptable proof of publication of the published notices** should be emailed to PROOFS@tceq.texas.gov or mailed to:

Texas Commission on Environmental Quality
Office of the Chief Clerk, MC-105
Attn: Notice Team / AIR Expedited Permitting
P.O. Box 13087
Austin, Texas 78711-3087

- Please ensure that the affidavit(s) you send to the Chief Clerk have all blanks on the affidavit filled in correctly.
- Photocopies of newspaper clippings, affidavits, and verifications must also be sent to those listed on the enclosed *Notification List* within the deadlines specified above.

Failure to Publish and Submit Proof of Publication

You must meet all publication requirements. **If you fail to publish the notice or submit proof of publication on time, then** the TCEQ may suspend further processing on your application or take other actions.

Sign Posting

Applicants for air quality permits must also post signs.

- You must post at least one sign in English and as applicable, in each alternative language.

- Signs must be in place on the first day of publication in a newspaper and must remain in place and be legible and be visible from the street for the entire duration of the publications' designated comment period (see Example C).
- The sign template enclosed (*Example C*) is an example only. Read the sign template carefully and notify the TCEQ if it has an error or omissions. It is your responsibility to verify that the appropriate information pertaining to your application is accurate. Any changes to the text prepared by the TCEQ must be approved by the agency.
- Signs placed at the site must be located within 10 feet of each (every) property line paralleling a public street, road, or highway. Signs must be spaced at not more than 1,500-foot intervals. A minimum of one sign, but not more than three signs are required along any property line paralleling a public street, road, or highway. Sign(s) must be placed at a sufficient height above the ground that is necessary for sign(s) to be 100 percent visible from the street.
- All lettering on the sign must be no less than 1½" in height with block printed capital lettering. The sign must be at least 18" wide and 28" tall, and consist of black lettering on a white background.
- Alternative language signs are required if alternative notice is required, even if no newspaper can be found.
- Inspect each posted sign daily to ensure it is present and visible throughout the entire comment period.
- You must submit verification of sign posting using the **Public Notice Verification Form (Form TCEQ-20244)** within **10 business days** after end of the publications' designated comment period. Do not submit the *Public Notice Verification Form* verifying sign posting until after the comment period is over. You cannot certify that the sign posting is in compliance until after the comment period is over. **This form is available at www.tceq.texas.gov/permitting/air/nav/air_publicnotice.html.**

Application in a Public Place

- You must provide a copy of the administratively complete application at a public place for review and copying by the public. This place must be in the county in which the facility is located or proposed to be located.
- A public place is one that is publicly owned or operated. For example, libraries, county courthouses, or city halls.
- The administratively complete application must be available beginning on the first day of newspaper publication and remain available during the entire public comment period.
- If the application is submitted to the TCEQ with information marked as confidential, you are required to indicate which specific portions of the application are not being made available to the public. These portions of the application must be accompanied with the following statement: "Any request for portions of this application that are marked as confidential must be submitted in writing, pursuant to the Public Information Act, to the Texas Commission on Environmental Quality, Public Information Coordinator, MC-197, P.O. Box 13087, Austin, Texas 78711-3087."
- You must submit verification of file availability using the **Public Notice Verification Form (Form TCEQ-20244)** within **10 business days** after end of the publications' designated comment period. Do not submit the form verifying that the application was in a public place until after the comment period is complete. If a public meeting is held or second notice is required causing the public comment period to be extended, at a later date you will be required to verify that the

application was in a public place during the entire public comment period. **This form is available at www.tceq.texas.gov/permitting/air/nav/air_publicnotice.html.**

General Information

When contacting the Commission regarding this application, please refer to the permit number at the top of the *Notice of Application and Intent to Obtain Permit*.

If you wish to obtain an electronic copy, please contact the initial reviewer who assisted in the preparation of this public notice package. The electronic version is available in Microsoft Word format only and can be requested once your application has been declared administratively complete. Please ensure that the electronic version is correct and consistent with the hard copies that were provided. Any revisions made may not be accepted. **You may download copies of the Public Notice Verification Form and Affidavits of publication by visiting our agency Web site at www.tceq.texas.gov/permitting/air/nav/air_publicnotice.html.**

If you have questions or need assistance regarding publication requirements, please contact the Office of the Chief Clerk at (512) 239-3300 or the administrative reviewer listed in the cover letter.

TCEQ-Office of the Chief Clerk
MC-105 Attn: Notice Team
P.O. Box 13087
Austin, Texas 78711-3087

Applicant Name: Exflur Research Corporation
Permit No.: 165848
Application Received Date: July 9, 2021

AFFIDAVIT OF PUBLICATION FOR AIR PERMITTING

STATE OF TEXAS §

COUNTY OF _____ §

BEFORE ME, the undersigned authority, on this day personally appeared

_____, who being by me duly sworn, deposes and says that (s)he is (*Name of Person Representing Newspaper*)

the _____ of the _____
(*Title of Person Representing Newspaper*) (Name of the Newspaper)

that said newspaper is generally circulated in _____, Texas;
(*The municipality or nearest municipality to the location of the facility or the proposed facility*)

that the enclosed notice was published in said newspaper on the following date(s):

(*Newspaper Representative's Signature*)

Subscribed and sworn to before me this the _____ day of _____, 20____
to certify which witness my hand and seal of office.

[Affix Seal]

Notary Public in and for the State of Texas

Print or Type Name of Notary Public

My Commission Expires

TCEQ-Office of the Chief Clerk
MC-105 Attn: Notice Team
P.O. Box 13087
Austin, Texas 78711-3087

Applicant Name: Exfluor Research Corporation
Permit No.: 165848
Application Received Date: July 9, 2021

ALTERNATIVE LANGUAGE AFFIDAVIT OF PUBLICATION FOR AIR PERMITTING

STATE OF TEXAS §

COUNTY OF _____ §

BEFORE ME, the undersigned authority, on this day personally appeared

_____, who being by me duly sworn, deposes and says that (s)he is (*Name of Person Representing Newspaper*)

the _____ of the _____;
(*Title of Person Representing Newspaper*) (*Name of the Newspaper*)

that said newspaper is generally circulated in _____, Texas;
(*The municipality or county in which the facility or proposed facility is located*)

that the enclosed notice was published in said newspaper on the following date(s):

(*Newspaper Representative's Signature*)

Subscribe and sworn to before me this the _____ day of _____, 20____
to certify which witness my hand and seal of office.

[Affix Seal]

Notary Public in and for the State of Texas

Print or Type Name of Notary Public

My Commission Expires

Notification List

It is the responsibility of the applicant to furnish the following offices with copies of the notices published, the *Affidavit of Publication for Air Permitting*, the *Alternative Language Affidavit of Publication for Air Permitting (if applicable)*, and a completed copy of the *Public Notice Verification Form (Form TCEQ-20244)*. Acceptable proof of publication and any affidavits and Form TCEQ-20244 should be emailed to PROOFS@tceq.texas.gov or mailed to the Texas Commission on Environmental Quality, Office of the Chief Clerk, MC-105, AIR Expedited Permitting, P.O. Box 13087, Austin, Texas 78711-3087.

Electronic copies should be submitted via email to the U.S. Environmental Protection Agency (EPA), **Region 6** at R6AirPermitsTX@EPA.gov. Please contact Ms. Aimee Wilson (wilson.aimee@epa.gov) at (214) 665-7596 if you have any questions pertaining to electronic submittals to the EPA.

Email copies to Mr. Joel Stanford at Joel.Stanford@tceq.texas.gov

Hard copies should be sent to the following:

Texas Commission on Environmental Quality
Air Section Manager
Austin Regional Office
12100 Park 35 Circle Bldg A Rm 179
Austin, Texas 78753-1808

For TCEQ Use Only

**Permit Application Routing and Summary Sheet
Air Permits**

This sheet should accompany all notices to be processed by the office of the chief clerk on the left side of the file folder.

Name of applicant: Exflur Research Corporation	
Facility/ Site name: Exflur Research	
TCEQ permit number: 165848	
Application received date: July 9, 2021	
Customer reference number: CN602696791	
Regulated entity number: RN110969227	
County: Williamson	Region: 11
Local program 1:	Local program 2:
Permit type: Permit Application	
Internal program routing	
Tech. team leader: Mr. Joel Stanford	Phone no. (512) 239-0270
APIRT team leader: Johnny Bowers	Date: July 14, 2021
Administratively reviewed by: Steve Piper	Phone no. (512) 239-1589
Administratively complete date:	July 14, 2021
Public viewing location must have internet access: <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
Is 2nd public notice required: <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
*709 applies	

For TCEQ Use Only

Applicant and Contact Information

This sheet should accompany all notices to be processed by the office of the chief clerk on the right side of the file folder.

Applicant's main contact and address to be shown on permit:	
Name/Title: Thomas Bierschenk PHD, Vice President	
Company: Exfluor Research Corporation	
Street/Road: 2350 Double Creek Dr	
City/State/Zip: Round Rock, TX 78664-3801	
Telephone: (512) 310-9044	Fax: (512) 310-9045
Applicant's technical representative/ consultant:	
Name/Title: Luke Bernhard, EHS Manager	
Company: Exfluor Research Corporation	
Street/Road: 2350 Double Creek Dr	
City/State/Zip: Round Rock, TX 78664-3801	
Phone: (512) 310-9044	Fax: (512) 310-9045
Person responsible for publishing notice:	
Name/Title: Thomas Bierschenk PHD, Vice President	
Company: Exfluor Research Corporation	
Street/Road: 2350 Double Creek Dr	
City/State/Zip: Round Rock, TX 78664-3801	
Telephone: (512) 310-9044	Fax: (512) 310-9045

ATTACHMENT 2

AFFIDAVIT OF MAUDE MCCORMICK ALLEN

STATE OF TEXAS

§

COUNTY OF TRAVIS

§

§

BEFORE ME, the undersigned notary public, on this day personally appeared Maude McCormick Allen, a person whose identity is known to me. After I administered an oath to her and upon her oath, she stated:

1. My name is Maude McCormick Allen. I am over eighteen (18) years of age and of sound mind and am otherwise competent and capable of making this affidavit. The facts testified to in this affidavit are within my personal knowledge and are true and correct.
2. I am on the Board of Directors of North San Gabriel Alliance, a Texas nonprofit organization.
3. I own about 175 acres of property where I also reside at 1251 County Road 208, Florence, Williamson County, Texas 76527. My property is approximately 1.3 miles from the proposed Exflur Research Corporation facility associated with proposed TCEQ Air Quality Permit No. 165848, and which, according to TCEQ, is to be located at 1100 County Road 236, Florence, Williamson County, Texas 76527.
4. Altogether, my immediate and extended family have owned nearly 1,500 acres in the area since 1852. My family, and many of my extended family members have lived on this property our entire lives. We are very familiar with the roads and the properties in the area.
5. I was a rural United States Postal Service mail carrier for 32 years. I retired last summer and my last day on the job was July 31, 2021.
6. Before becoming aware of the proposed Exflur facility, I have seen at least three TCEQ signs posted in other locations while on my mail route. One sign was for a proposed air quality permit for an asphalt plant on FM 487 near Florence, Texas. The other two were near quarries or concrete plants on Ronald Reagan Boulevard and FM 2843. I observed these TCEQ signs within the last four to five years.
7. I drove on County Road 236 past the site of the proposed Exflur facility once per day every weekday last summer up through July 31, 2021, because that was the route I would drive home when my mail carrier shift ended between 3:30 and 4:00 P.M.
8. I also drove on County Road 236 past the site of the proposed Exflur facility nearly every Saturday, if not every Saturday, last summer, because I would regularly drive into Georgetown to run other errands. On the Saturdays I did drive to Georgetown, I


drove past the Exflur site twice each day, first on my way to Georgetown and again on my home again.

9. As a rural mail carrier and a longtime resident of the area, I always tried to be very aware of my surroundings. I also pride myself in noticing when changes have occurred, especially changes that I thought I or my neighbors needed to be concerned about. For example, I have stopped and knocked on neighbors' doors before if I thought that I should conduct a welfare check. On several occasions, I noticed that cattle were out or a mailbox was broken, and I would regularly stop and notify the property owner.
10. Between June and August 2021, on my regular drives past the site of the proposed Exflur facility, I observed that vegetation along the fenceline was being cleared and cleaned up. I specifically remember observing that vegetation near the gate was being cleared as was cedar trees around the well site was being cleared, which was visible from the road.
11. At no time during the months of June, July, or August, and at no time since, have I seen any sign on the site of the proposed Exflur facility notifying the public of a proposed air quality permit or any other permit from TCEQ.
12. I did not learn about the proposed Exflur facility or the proposed air quality permit until sometime in late January or early February 2022 when a family member told me about a sign that she had seen on the gate having to do with a septic system permit from Williamson County.
13. I drove by to see the sign for myself very soon after learning about it. That is when I first observed what appeared to be a standard 8 1/2-inch by 11-inch sign regarding permitting through Williamson County. At that time, that was the only sign posted in that location.
14. I drove by again on March 15, 2022, and took a photo of the gate. The gate and the sign looked the same as the site did the first time I saw the Williamson County sign.
15. Attached as **Exhibit A** is a photo I took on March 15, 2022. To take the photo, I pulled my car off of the north side of County Road 236 and took the photo while facing north, showing the Williamson County sign posted on the Exflur gate. The photograph in Exhibit A is a true and accurate depiction of what I saw on the site that day.
16. Based on my personal observations, I estimate that the Exflur fenceline that runs the length of the Exflur property is approximately 15 feet from the edge of County Road 236 near the gate. I estimate that the gate is at least another 30 feet from that fenceline.
17. Attached as **Exhibit B** is a photo I took on March 30, 2022. This photo shows the proximity of County Road 236 to the Exflur fenceline and to the Exflur gate. The photograph in Exhibit B is a true and accurate depiction of what I saw on the site that day.

18. I have observed the Exfluor fence and gate in the same configuration for several decades. It was in the same configuration last summer during the months of June, July, and August, where the gate was at least 30 feet from the fenceline and another 15 feet from the road.

19. I still have never seen a sign on the Exfluor site regarding the TCEQ air quality permit.

Further the Affiant sayeth not.


Maude McCormick Allen, Affiant

SWORN TO AND SUBSCRIBED before me this 30 day of March, 2022.


Notary Public, State of Texas

5/16/23
My Commission Expires:

Calvin Clites
Notary Public's Printed Name



EXHIBIT A



Photo Taken by Maude McCormick Allen on March 15, 2022.

EXHIBIT B



Photo Taken by Maude McCormick Allen on March 30, 2022.

ATTACHMENT 3



County of Williamson, Esri, HERE, Garmin, GeoTechnologies, Inc., NGA, USGS

Application Exhibit 20

TCEQ ED – Amended/Consolidated
NORI/NAPD Public Notice Documents,
Including the Draft Permit

Jon Niermann, *Chairman*
Emily Lindley, *Commissioner*
Bobby Janecka, *Commissioner*
Toby Baker, *Executive Director*



124292

TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

Protecting Texas by Reducing and Preventing Pollution

April 27, 2022

DR THOMAS BIERSCHENK PHD
VICE PRESIDENT
EXFLUOR RESEARCH CORPORATION
2350 DOUBLE CREEK DR
ROUND ROCK TX 78664-3801

Re: Amended Notice of Application and Preliminary Decision
Small Business Stationary Source Permit Application
Consolidated Notice of Receipt of Application and Intent to Obtain Permit and Notice of Application
and Preliminary Decision
Permit Number: 165848
Exfluor Research Corporation
Exfluor Research
Florence, Williamson County
Regulated Entity Number: RN110969227
Customer Reference Number: CN602696791

Dear Dr. Bierschenk:

The Texas Commission on Environmental Quality (TCEQ) has completed the technical review of your application and has prepared a preliminary decision and draft permit.

You are now required to publish notice of your proposed activity. To help you meet the regulatory requirements associated with this notice, we have included the following items:

- Notices for Newspaper Publication (Examples A)
- Sign Posting Example (Example C)
- Public Notice Checklist
- Instructions for Public Notice
- Affidavit of Publication for Air Permitting (Form TCEQ-20533) and Alternative Language Affidavit of Publication for Air Permitting (Form TCEQ-20534)
- Web link to download Public Notice Verification Form (refer to Public Notice Instructions)
- Notification List
- Draft Permit

Please note that it is **very important** that you follow **all** directions in the enclosed instructions. If you do not, you may be required to republish the notice. A common mistake is the unauthorized changing of notice wording or font. If you have any questions, please contact us before you proceed with publication.

A "Public Notice Checklist" is enclosed which notes the time limitations for each step of the public notice process. **The processing of your application may be delayed if these time limitations are not met (i.e.; submitting proof of publication of the notice within 10 business days after publication, affidavits of publication within 30 calendar days after the date of publication, and public notice verification form within 10 business days after the end of the designated comment period).** This checklist should be used as a tool in conjunction with the enclosed, detailed instructions.

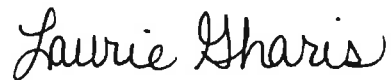
If you do not comply with **all** requirements described in the instructions, further processing of your application may be suspended or the agency may take other actions.

Dr. Thomas Bierschenk PhD
Page 2
April 27, 2022

Re: Permit: 165848

If you have any questions regarding publication requirements, please contact the Office of the Chief Clerk at (512) 239-3300. If you have any other questions, please contact Ms. Cara Hill at (512) 239-5123.

Sincerely,



Laurie Gharis
Chief Clerk
Office of the Chief Clerk
Texas Commission on Environmental Quality

Enclosure

cc: Air Section Manager, Region 11 - Austin
Air Permits Section Chief, New Source Review Section (6MM-AP), U.S. Environmental Protection
Agency, Region 6, Dallas

Project Number: 331049

TEXAS COMMISSION ON ENVIRONMENTAL QUALITY



EXAMPLE A

AMENDED CONSOLIDATED NOTICE OF RECEIPT OF APPLICATION AND INTENT TO OBTAIN PERMIT AND NOTICE OF APPLICATION AND PRELIMINARY DECISION

PROPOSED PERMIT NUMBER: 165848

APPLICATION AND PRELIMINARY DECISION. Exflur Research Corporation, 2350 Double Creek Dr, Round Rock, Texas 78664-3801, has applied to the Texas Commission on Environmental Quality (TCEQ) for issuance of Proposed Air Quality Permit Number 165848, which would authorize construction of a Exflur Research located at 1100 County Road 236, Florence, Williamson County, Texas 76527. This application was processed in an expedited manner, as allowed by the commission's rules in 30 Texas Administrative Code, Chapter 101, Subchapter J. This application was submitted to the TCEQ on July 9, 2021. The proposed facility will emit the following contaminants: carbon monoxide, hydrogen fluorides, hazardous air pollutants, nitrogen oxides, organic compounds, and particulate matter including particulate matter with diameters of 10 microns or less and 2.5 microns or less.

The executive director has completed the technical review of the application and prepared a draft permit which, if approved, would establish the conditions under which the facility must operate. The executive director has made a preliminary decision to issue the permit because it meets all rules and regulations. The permit application, executive director's preliminary decision, and draft permit will be available for viewing and copying at the TCEQ central office, the TCEQ Austin regional office, and at the Eula Hunt Beck Florence Public Library, 207 East Main Street, Williamson County, Texas, beginning the first day of publication of this notice. The facility's compliance file, if any exists, is available for public review at the TCEQ Austin Regional Office, 12100 Park 35 Circle Building A Room 179, Austin, Texas.

PUBLIC COMMENT. You may submit public comments to the Office of the Chief Clerk at the address below. The TCEQ will consider all public comments in developing a final decision on the application and the executive director will prepare a response to those comments.

PUBLIC MEETING. You may request a public meeting to the Office of the Chief Clerk at the address below. The purpose of a public meeting is to provide the opportunity to submit comments or ask questions about the application. A public meeting about the application will be held if requested by an interested person and the executive director determines that there is a significant degree of public interest in the application or if requested by a local legislator. A public meeting is not a contested case hearing.

OPPORTUNITY FOR A CONTESTED CASE HEARING. You may request a contested case hearing if you are a person who may be affected by emissions of air contaminants from the facility. If requesting a contested case hearing, you must submit the following: (1) your name (or for a group or association, an official representative), mailing address, and daytime phone number; (2) applicant's name and permit number; (3) the statement "[I/we] request a contested case hearing"; (4) a specific description of how you would be adversely affected by the application and air emissions from the facility in a way not common to the general public; (5) the location and distance of your property relative to the facility; (6) a description of how you use the property which may be impacted by the facility; and (7) a list of all disputed issues of fact that you submit during the comment period. If the request is made by a group or an association, one or more members who have standing to request a hearing must be identified by name and physical address. The interests the group or association seeks to protect must also be identified. You may also submit your proposed adjustments to the application/permit which would satisfy your concerns.

The deadline to submit a request for a contested case hearing is 30 days after newspaper notice is published. If a request is timely filed, the deadline for requesting a contested case hearing will be extended to 30 days after the mailing of the response to comments.

If a hearing request is timely filed, following the close of all applicable comment and request periods, the Executive Director will forward the application and any requests for contested case hearing to the Commissioners for their consideration at a scheduled Commission meeting. The Commission may only grant a request for a contested case hearing on issues the requestor submitted in their timely comments that were not subsequently withdrawn. **If a hearing is granted, the subject of a hearing will be limited to disputed issues of fact or mixed questions of fact and law relating to relevant and material air quality concerns submitted during the comment period.** Issues such as property values, noise, traffic safety, and zoning are outside of the Commission's jurisdiction to address in this proceeding.

RESPONSE TO COMMENTS AND EXECUTIVE DIRECTOR ACTION. After the deadline for public comments, the executive director will consider the comments and prepare a response to all relevant and material or significant public comments. Because no timely hearing requests have been received, after preparing the response to comments, the executive director may then issue final approval of the application. **The response to comments, along with the executive director's decision on the application will be mailed to everyone who submitted public comments or is on a mailing list for this application, and will be posted electronically to the Commissioners' Integrated Database (CID).**

INFORMATION AVAILABLE ONLINE. When they become available, the executive director's response to comments and the final decision on this application will be accessible through the Commission's Web site at www.tceq.texas.gov/goto/cid. Once you have access to the CID using the above link, enter the permit number for this application which is provided at the top of this notice. This link to an electronic map of the site or facility's general location is provided as a public courtesy and not part of the application or notice. For exact location, refer to application. <http://www.tceq.texas.gov/assets/public/hb610/index.html?lat=30.791111&lng=-97.904166&zoom=13&type=r>.

MAILING LIST. You may ask to be placed on a mailing list to obtain additional information on this application by sending a request to the Office of the Chief Clerk at the address below.

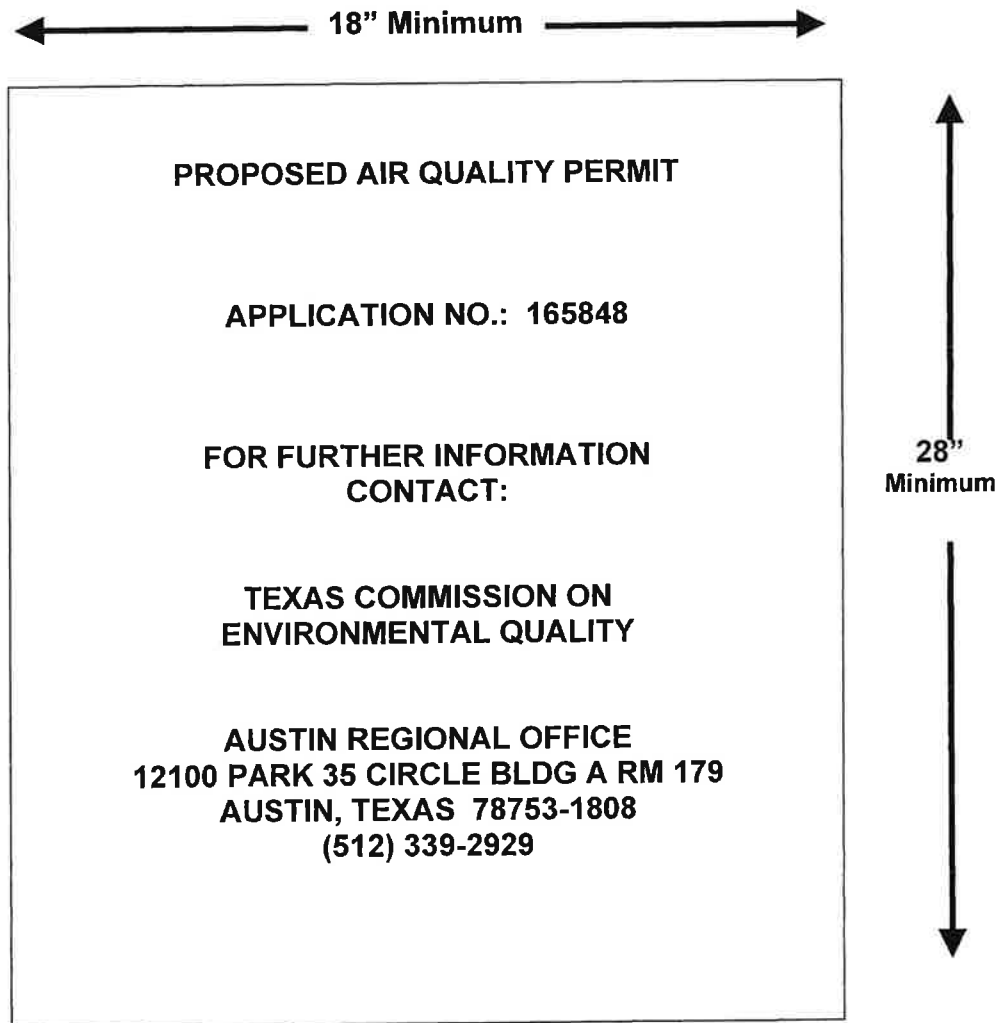
AGENCY CONTACTS AND INFORMATION. Public comments and requests must be submitted either electronically at www14.tceq.texas.gov/epic/eComment/, or in writing to the Texas Commission on Environmental Quality, Office of the Chief Clerk, MC-105, P.O. Box 13087, Austin, Texas 78711-3087. Please be aware that any contact information you provide, including your name, phone number, email address and physical address will become part of the agency's public record. For more information about this permit application or the permitting process, please call the Public Education Program toll free at 1-800-687-4040. Si desea información en Español, puede llamar al 1-800-687-4040.

Further information may also be obtained from Exflur Research Corporation at the address stated above or by calling Dr. Thomas Bierschenk PhD, Vice President at (512) 310-9044.

Amended Notice Issuance Date: April 27, 2022

Example C
Sign Posting

Sign(s) must be in place on day of publication of first newspaper notice **and must remain in place and the lettering must be legible during that designated comment period (30 days)**. Note - The information shown is an example only. It is your responsibility to verify that the appropriate information pertaining to your application is accurate. Each sign placed at the site must be located within 10 feet of each (every) property line paralleling a public highway, street or road. Signs must be visible from the street and spaced at not more than 1,500-foot intervals. A minimum of one sign, but not more than three signs shall be required along any property line paralleling a public highway, street, or road.



Sign(s) must be placed at whatever height above the ground is necessary for sign(s) to be 100% visible from the street.

WHITE BACKGROUND WITH BLACK LETTERS

All lettering must be no less than 1-1/2 inch block printed capitals.

Public Notice Checklist
Consolidated Notice of Receipt of Application and Intent to Obtain Permit and Notice of Application and Preliminary Decision
(1st Notice and 2nd Notice)

The following tasks must be completed for public notice. If publication in an alternative language is required, please complete the tasks for both the English and alternative language publications. Detailed instructions are included in the "Instructions for Public Notice" section of this package.

Within 33 calendar days after date of this letter
<p>Publish <i>Notice of Application and Preliminary Decision for an Air Quality Permit</i> in the same newspaper(s) in which you published <i>Notice of Receipt of Intent to Obtain Permit</i> for this application.</p> <ul style="list-style-type: none"> - Example A must be published in "public notice" section of newspaper. Review for accuracy prior to publishing. - As part of the expedited permitting process, it is recommended that you publish immediately. <p>Provide copy of the complete application (including any subsequent revisions) and the executive director's preliminary decision (including the draft permit) at a public place for review and copying. Keep them there for duration of the designated comment period.</p>
First day of newspaper publication
<p>Review published newspaper notice for accuracy. If errors, contact Air Permits Division. Ensure copy of the complete application (including any subsequent revisions) and the executive director's preliminary decision (including the draft permit) are at the public place. It is recommended that the signs from the first notice be in place and the lettering must remain legible and visible until 30 days after publication of the <i>Notice of Application and Preliminary Decision</i> (either English or alternative language notice, whichever is later).</p>
Within 10 business days after date of publication
<p>Proof of publication showing publication date and newspaper name should be emailed to PROOFS@tceq.texas.gov or mailed to:</p> <p style="padding-left: 40px;">Texas Commission on Environmental Quality Office of the Chief Clerk, MC-105 Attn: Notice Team / AIR Expedited Permitting P.O. Box 13087 Austin, Texas 78711-3087</p> <p>Mail or email, as instructed, photocopies of newspaper clippings showing publication date and newspaper name to persons listed on <i>Notification List</i>.</p>
Within 30 calendar days after date of publication
<p>Affidavit of publication for air permitting and alternative language affidavit of publication for air permitting (if applicable) should be emailed to PROOFS@tceq.texas.gov or mailed to:</p> <p style="padding-left: 40px;">Texas Commission on Environmental Quality Office of the Chief Clerk, MC-105 Attn: Notice Team / AIR Expedited Permitting P.O. Box 13087 Austin, Texas 78711-3087</p> <p>Mail or email, as instructed, photocopies of affidavits to persons listed on <i>Notification List</i>.</p>
Within 10 business days after end of the designated comment period
<p>Public Notice Verification Form should be emailed to PROOFS@tceq.texas.gov or mailed to:</p> <p style="padding-left: 40px;">Texas Commission on Environmental Quality Office of the Chief Clerk, MC-105 Attn: Notice Team / AIR Expedited Permitting P.O. Box 13087 Austin, Texas 78711-3087</p> <p>Mail or email, as instructed, photocopies of Public Notice Verification Form to persons listed on <i>Notification List</i>.</p>

TEXAS COMMISSION ON ENVIRONMENTAL QUALITY



Instructions for Public Notice For New Source Review Air Permit For Small Business Stationary Source

Consolidated Notice of Receipt of Application and Intent to Obtain Permit and Notice of Application and Preliminary Decision

We have completed the technical review of your application and issued a preliminary decision. You must comply with the following instructions:

Review Notice

Included in the notice is all of the information which the commission believes is necessary to effectuate compliance with applicable public notice requirements. Please read it carefully and notify the Texas Commission on Environmental Quality (TCEQ) immediately if it contains any errors or omissions. You are responsible for ensuring the accuracy of all information published. You may not change the text of the notice without prior approval from the TCEQ.

Newspaper Notice

- You must publish the enclosed *Consolidated Notice of Receipt of Application and Intent to Obtain Permit and Notice of Application and Preliminary Decision* within **30 calendar days** after the date of administrative and technical completeness. As part of the expedited permitting process, it is recommended that you publish immediately.
- You must publish the enclosed notice at your expense, in the same newspaper(s) in which you published the *Notice of Receipt and Intent to Obtain Permit* for this application. The newspaper must be a newspaper that is of general circulation in the municipality where the facility is or will be located. If the facility is not located within a municipality, the newspaper must be of general circulation in the municipality nearest the location.
- You must publish this notice in one issue of any applicable newspaper.
- The bold text of the enclosed notice **must** be printed in the newspaper in a font style or size that distinguishes it from the rest of the notice (i.e., **bold**, *italics*). **Failure to do so may require re-notice.**

Alternative Language Notice

In certain circumstances, applicants for air permits must complete notice in alternative languages.

- Public notice rules require the applicant to determine whether a bilingual program is required at either the elementary or middle school nearest to the facility or proposed facility location. Bilingual education programs are determined on a district-wide basis. When students who are required to attend either school are eligible to be enrolled in a bilingual education program, some alternative language notice is required (newspaper notice).

- Since the school district, and not the schools, must provide the bilingual education program, these programs do not have to be located at the elementary or middle school nearest to the facility or proposed facility to trigger the alternative language notice requirement. If there are students who would normally attend the nearest schools eligible to be taught in a bilingual education program at a different location, alternative language notice is required.
- If triggered, publications of alternative language notices must be made in a newspaper or publication printed primarily in each language taught in the bilingual education program. The same newspaper(s) used for *Notice of Receipt and Intent to Obtain Permit* must be used for publication of the *Notice of Application and Preliminary Decision for an Air Quality Permit*. This notice is required if such a newspaper or publication exists in the municipality or the county where the facility is or will be located.
- The applicant must demonstrate a good faith effort to identify a newspaper or publication in the required language. If a newspaper or publication of general circulation published at least once a month in such language cannot be found, publishing in that language is not required, but signs must remain posted in the same location(s) utilized during the *Notice of Receipt of Intent to Obtain Permit (1st public notice)*.
- Publication in an alternative language section or insertion within an English language newspaper does not satisfy these requirements.
- The applicant has the burden to demonstrate compliance with these requirements. You must fill out the ***Public Notice Verification Form for Consolidated Public Notice for Qualifying New or Amended New Source Review Permits or Flexible Permits (Form TCEQ-20866)*** indicating your compliance with the requirements regarding publication in an alternative language. **This form is available at www.tceq.texas.gov/permitting/air/nav/air_publicnotice.html.**
- It is suggested the applicant work with the local school district to do the following:
 - (a) determine if a bilingual program is required in the district;
 - (b) determine which language is required by the bilingual program;
 - (c) locate the nearest elementary and middle schools; and
 - (d) determine if any students attending either school are entitled to be enrolled in a bilingual educational program.
- **If you determine that you must meet the alternative language notice requirements, you are responsible for ensuring that the publication in the alternative language is complete and accurate in that language.** Since the most common bilingual programs are in Spanish, the TCEQ has provided example Spanish notice templates for your use. All italic notes should be replaced with the corresponding Spanish translations for the specific application and published in the alternative language publication. Electronic versions of the Spanish templates are available through the Air Permits Division Web site at www.tceq.texas.gov/qoto/air/publicnotice.
- If you are required to publish notice in a language other than Spanish, you must translate the entire public notice at your own expense.

Public Comment Period

- The public comment period should last at least **30 calendar days after publication of the last notice**.
- The comment period will be longer if the last day of the public comment period ends on a weekend or a holiday. In this case, the comment period will end on the next business day.

- The comment period for the permit may lengthen depending on whether a public meeting is held. If a public meeting is held, the comment period will be extended to the later of either the date of the public meeting or the end of the second notice period.

Proof of Publication

- Check each publication to ensure that the articles were accurately published. If a notice was not published correctly you may be required to republish.
- For each newspaper in which you published, you must submit proof of publication that shows the notice, the date of publication, and the name of the newspaper to the Office of the Chief Clerk within **10 business days** after the date of publication. Acceptable proofs of publication are 1) copies of the published notice or 2) the newspaper clippings of the published notice. If you choose to submit copies of the published notice to the Office of the Chief Clerk, copies must be on standard-size 8½" x 11" paper and must show the actual size of the published notice (do not reduce the image when making copies). Published notices longer than 11" must be copied onto multiple 8½" x 11" pages. Please note, submitting a copy of your published notice could result in faster processing of your application. It is recommended that you maintain newspaper clippings or tear sheets of the notice for your records.
- You must submit an **affidavit of publication for air permitting and alternate language affidavit of publication for air permitting (if applicable)** to the Office of the Chief Clerk within **30 calendar days** after the date of publication. **You must use the enclosed affidavit forms.** The affidavits must clearly identify the applicant's name and permit number. You are encouraged to submit the affidavit with the proof of publication described above.
- You must submit the **Public Notice Verification Form for Consolidated Public Notice for Qualifying New or Amended New Source Review Permits or Flexible Permits (Form TCEQ-20866)** to the Office of the Chief Clerk within **10 business days** of the end of this public comment period. You must use this form to certify that you have met bilingual notice requirements. **This form is available at www.tceq.texas.gov/permitting/air/nav/air_publicnotice.html.**
- The **affidavits of publication, Public Notice Verification Form, and acceptable proof of publication of the published notices** should be emailed to PROOFS@tceq.texas.gov or mailed to:

Texas Commission on Environmental Quality
Office of the Chief Clerk, MC-105
Attn: Notice Team / AIR Expedited Permitting
P.O. Box 13087
Austin, Texas 78711-3087

- Please ensure that the affidavit(s) you send to the Chief Clerk have all blanks filled in correctly.
- Photocopies of newspaper clippings, affidavits, and verifications must also be sent to those listed on the enclosed *Notification List* within the deadlines specified above.

Failure to Publish and Submit Proof of Publication

You must meet all publication requirements. **If you fail to publish the notice or submit proof of publication on time**, the TCEQ may suspend further processing on your application or take other actions.

Sign Posting

It is recommended that the signs that were put in place prior to publication of the first notice remain in place and be legible and visible until 30 days after publication of the *Notice of Application and Preliminary Decision* (either English or alternative language notice, whichever is later).

Application in a Public Place

- You must provide a copy of the complete application (including any subsequent revisions) and the executive director's preliminary decision (including the draft permit), at a public place for review and copying by the public. This place must be in the county in which the facility is located or proposed to be located.
- A public place is one that is publicly owned or operated (ex: libraries, county courthouses, or city halls.)
- This copy must be accessible to the public for review and copying. The copy must be available beginning on the first day of newspaper publication and remain in place until the commission has taken action on the application or the commission refers issues to the State Office of Administrative Hearings.
- If the application is submitted to the TCEQ with information marked as "CONFIDENTIAL," you are required to indicate which specific portions of the application are not being made available to the public. These portions of the application must be accompanied with the following statement: Any request for portions of this application that are marked as confidential must be submitted in writing, pursuant to the Public Information Act, to the Texas Commission on Environmental Quality, Public Information Coordinator, MC-197, P.O. Box 13087, Austin, Texas 78711-3087."
- You must submit verification of file availability using the ***Public Notice Verification Form for Consolidated Public Notice for Qualifying New or Amended New Source Review Permits or Flexible Permits (Form TCEQ-20866)*** within **10 business days** after end of the publications' designated comment period. Do not submit the form verifying that the application was in a public place until after the comment period is complete. If a public meeting is held or second notice is required causing the public comment period to be extended, at a later date you will be required to verify that the application was in a public place during the entire public comment period. **This form is available at www.tceq.texas.gov/permitting/air/nav/air_publicnotice.html.**

General Information

When contacting the Commission regarding this application, please refer to the permit number at the top of the *Notice of Application and Preliminary Decision*.

If you have questions or need assistance regarding publication requirements, please contact the Office of the Chief Clerk at (512) 239-3300 or the project reviewer listed in the cover letter.

TCEQ-Office of the Chief Clerk
MC-105 Attn: Notice Team
P.O. Box 13087
Austin, Texas 78711-3087

Applicant Name: Exflur Research Corporation
Permit No.: 165848
Application Received Date: July 9, 2021

AFFIDAVIT OF PUBLICATION FOR AIR PERMITTING

STATE OF TEXAS §

COUNTY OF _____ §

BEFORE ME, the undersigned authority, on this day personally appeared

_____, who being by me duly sworn, deposes and says that (s)he is *(Name of Person Representing Newspaper)*

the _____ of the _____
(Title of Person Representing Newspaper) *(Name of the Newspaper)*

that said newspaper is generally circulated in _____, Texas;
(The municipality or nearest municipality to the location of the facility or the proposed facility)

that the enclosed notice was published in said newspaper on the following date(s):

(Newspaper Representative's Signature)

Subscribed and sworn to before me this the _____ day of _____, 20____
to certify which witness my hand and seal of office.

[Affix Seal]

Notary Public in and for the State of Texas

Print or Type Name of Notary Public

My Commission Expires

TCEQ-Office of the Chief Clerk
MC-105 Attn: Notice Team
P.O. Box 13087
Austin, Texas 78711-3087

Applicant Name: Exflor Research Corporation
Permit No.: 165848
Application Received Date: July 9, 2021

ALTERNATIVE LANGUAGE AFFIDAVIT OF PUBLICATION FOR AIR PERMITTING

STATE OF TEXAS §

COUNTY OF _____ §

BEFORE ME, the undersigned authority, on this day personally appeared

_____, who being by me duly sworn, deposes and says that (s)he is (*Name of Person Representing Newspaper*)

the _____ of the _____;
(*Title of Person Representing Newspaper*) (Name of the Newspaper)

that said newspaper is generally circulated in _____, Texas;
(*The municipality or county in which the facility or proposed facility is located*)

that the enclosed notice was published in said newspaper on the following date(s):

(*Newspaper Representative's Signature*)

Subscribe and sworn to before me this the _____ day of _____, 20____
to certify which witness my hand and seal of office.

Notary Public in and for the State of Texas

[Affix Seal]

Print or Type Name of Notary Public

My Commission Expires

Notification List

It is the responsibility of the applicant to furnish the following offices with copies of the notices published, the *Affidavit of Publication for Air Permitting*, the *Alternative Language Affidavit of Publication for Air Permitting (if applicable)*, and a completed copy of the *Public Notice Verification for Consolidated Public Notice for Qualifying New or Amended New Source Review Permits or Flexible Permits (Form TCEQ-20866)*. Acceptable proof of publication and any affidavits and Form TCEQ-20244 should be emailed to PROOFS@tceq.texas.gov or mailed to the Texas Commission on Environmental Quality, Office of the Chief Clerk, MC-105, AIR Expedited Permitting, P.O. Box 13087, Austin, Texas 78711-3087.

Electronic copies should be submitted via email to the U.S. Environmental Protection Agency (EPA), **Region 6** at R6AirPermitsTX@EPA.gov. Please contact Ms. Aimee Wilson (wilson.aimee@epa.gov) at (214) 665-7596 if you have any questions pertaining to electronic submittals to the EPA.

Email copies to Ms. Cara Hill at Cara.Hill@tceq.texas.gov

Hard copies should be sent to the following:

Texas Commission on Environmental Quality
Austin Regional Office
12100 Park 35 Circle Bldg A Rm 179
Austin, Texas 78753-1808

For TCEQ Use Only

**Permit Application Routing and Summary Sheet
Air Permits**

This sheet should accompany all notices to be processed by the office of the chief clerk on the left side of the file folder.

Name of applicant: Exflur Research Corporation	
Facility/ Site name: Exflur Research	
TCEQ permit number: 165848	
Application received date: July 9, 2021	
Customer reference number: CN602696791	
Regulated entity number: RN110969227	
County: Williamson	Region: 11
Local program 1:	Local program 2:
Permit type:	
Internal program routing	
Tech. team leader:	Phone no. (512) 239-
APIRT team leader: Johnny Bowers	Date:
Technically reviewed by: Cara Hill	Phone no. (512) 239-5123
Administratively complete date: 07/14/2021	
Public viewing location must have internet access: <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	

For TCEQ Use Only

Applicant and Contact Information

This sheet should accompany all notices to be processed by the office of the chief clerk on the right side of the file folder.

Applicant's main contact and address to be shown on permit:	
Name/Title: ,	
Company:	
Street/Road:	
City/State/Zip:	
Telephone:	Fax:
Applicant's technical representative/ consultant:	
Name/Title: ,	
Company:	
Street/Road:	
City/State/Zip:	
Phone:	Fax:
Person responsible for publishing notice:	
Name/Title: ,	
Company:	
Street/Road:	
City/State/Zip:	
Telephone:	Fax:

Special Conditions

Permit Number 165848

1. This permit covers only those sources of emissions listed in the attached table entitled "Emission Sources - Maximum Allowable Emission Rates" (MAERT), and those sources are limited to the emission limits and other conditions specified in that table.
2. Non-fugitive emissions from relief valves, safety valves, or rupture discs of gases containing volatile organic compounds (VOC) at a concentration of greater than 1 percent are not authorized by this permit unless authorized on the MAERT. Any releases directly to atmosphere from relief valves, safety valves, or rupture discs of gases containing VOC at a concentration greater than 1 weight percent are not consistent with good practice for minimizing emissions.

Emission Standards and Operational Specifications

3. The process vents from the Fluorine Generators, Fluorination Reactors, Thermal Cracking Reactors, Distillation Units, Polishing Reactors, Reduction Reactors, Hydrolysis Reactors, Methanolysis Reactors, Bromination Reactors, Extraction Tank, Anhydride Flasks, Acrylate Flasks, and Drying Flask shall be routed to the Exhaust Gas Vent System (EPN EP3-1).
4. Annual production shall not the rates listed in the Table 2 Material Balance submitted with application form PI-1 dated July 9, 2021. Production records shall be updated monthly with the rates of each product produced during the previous month and rolling 12 months to date.
5. The thermal oxidizers shall be fired with hydrogen.

Thermal Oxidizers

6. The following requirements shall apply to Thermal Oxidizer 1 (EPN EP3-1).
 - A. Thermal Oxidizer 1 (EPN EP3-1), shall maintain the VOC concentration in the exhaust gas less than 10 ppmv on a dry basis, corrected to 3 percent oxygen, or achieve a VOC destruction efficiency greater than 99.9 percent.
 - B. The thermal oxidizer firebox exit temperature shall be maintained at not less than 2000°C and exhaust oxygen concentration not less than 3 percent on a six-minute average while waste gas is being fed into the oxidizer prior to initial stack testing. After the initial stack test has been completed, the six minute average temperature shall be equal to, or greater than the respective hourly average maintained during the most recent satisfactory stack testing required by Special Condition No. 9.
 - C. The thermal oxidizer exhaust temperature shall be continuously monitored and recorded when waste gas is directed to the oxidizer. The temperature measurement device shall reduce the temperature readings to an averaging period of 6 minutes or less and record it at that frequency. The temperature measurement device shall be installed, calibrated, and maintained according to accepted practice and the manufacturer's specifications. The device shall have an accuracy of the greater of ± 0.75 percent of the temperature being measured expressed in degrees Celsius or $\pm 2.5^\circ\text{C}$.

Quality assured (or valid) data must be generated when the thermal oxidizer is operating except during the performance of a daily zero and span check. Loss of valid data due to periods of monitor break down, out-of-control operation (producing inaccurate data), repair, maintenance, or calibration may be exempted provided it does not exceed 5 percent of the

time (in minutes) that the thermal oxidizer operated over the previous rolling 12 month period. The measurements missed shall be estimated using engineering judgment and the methods used recorded.

- D. The oxygen analyzer used to satisfy this Special Condition shall continuously monitor and record oxygen concentration when waste gas is directed to the oxidizer. It shall reduce the oxygen readings to an averaging period of 6 minutes or less and record it at that frequency.

The oxygen analyzer shall be zeroed and spanned daily and corrective action taken when the 24-hour span drift exceeds two times the amounts specified Performance Specification No. 3, 40 CFR Part 60, Appendix B. Zero and span is not required on weekends and plant holidays if instrument technicians are not normally scheduled on those days.

The analyzer shall be quality-assured at least semiannually using cylinder gas audits (CGAs) in accordance with 40 CFR Part 60, Appendix F, Procedure 1, § 5.1.2, with the following exception: a relative accuracy test audit is not required once every four quarters (i.e., two successive semiannual CGAs may be conducted). An equivalent quality-assurance method approved by the TCEQ may also be used. Successive semiannual audits shall occur no closer than four months. Necessary corrective action shall be taken for all CGA exceedances of ± 15 percent accuracy and any continuous emissions monitoring system downtime in excess of 5 percent of the incinerator operating time. These occurrences and corrective actions shall be reported to the appropriate TCEQ Regional Director on a quarterly basis. Supplemental stack concentration measurements may be required at the discretion of the appropriate TCEQ Regional Director.

Quality assured (or valid) data must be generated when the thermal oxidizer is operating except during the performance of a daily zero and span check. Loss of valid data due to periods of monitor break down, out-of-control operation (producing inaccurate data), repair, maintenance, or calibration may be exempted provided it does not exceed 5 percent of the time (in minutes) that the thermal oxidizer operated over the previous rolling 12 month period. The measurements missed shall be estimated using engineering judgment and the methods used recorded.

7. The following requirements shall apply to Thermal Oxidizer 2 (EPN EP3-1).
- A. Thermal Oxidizer 2 (EPN EP3-1), shall maintain the VOC concentration in the exhaust gas less than 10 ppmv on a dry basis, corrected to 3 percent oxygen, or achieve a VOC destruction efficiency greater than 99.9 percent.
- B. The thermal oxidizer firebox exit temperature shall be maintained at not less than 2000°C and exhaust oxygen concentration not less than 3 percent on a six-minute average while waste gas is being fed into the oxidizer prior to initial stack testing. After the initial stack test has been completed, the six minute average temperature shall be equal to, or greater than the respective hourly average maintained during the most recent satisfactory stack testing required by Special Condition No. 9.
- C. The thermal oxidizer exhaust temperature shall be continuously monitored and recorded when waste gas is directed to the oxidizer. The temperature measurement device shall reduce the temperature readings to an averaging period of 6 minutes or less and record it at that frequency. The temperature measurement device shall be installed, calibrated, and maintained according to accepted practice and the manufacturer's specifications. The device

shall have an accuracy of the greater of ± 0.75 percent of the temperature being measured expressed in degrees Celsius or $\pm 2.5^{\circ}\text{C}$.

Quality assured (or valid) data must be generated when the thermal oxidizer is operating except during the performance of a daily zero and span check. Loss of valid data due to periods of monitor break down, out-of-control operation (producing inaccurate data), repair, maintenance, or calibration may be exempted provided it does not exceed 5 percent of the time (in minutes) that the thermal oxidizer operated over the previous rolling 12 month period. The measurements missed shall be estimated using engineering judgment and the methods used recorded.

- D. The oxygen analyzer used to satisfy this Special Condition shall continuously monitor and record oxygen concentration when waste gas is directed to the oxidizer. It shall reduce the oxygen readings to an averaging period of 6 minutes or less and record it at that frequency.

The oxygen analyzer shall be zeroed and spanned daily and corrective action taken when the 24-hour span drift exceeds two times the amounts specified Performance Specification No. 3, 40 CFR Part 60, Appendix B. Zero and span is not required on weekends and plant holidays if instrument technicians are not normally scheduled on those days.

The analyzer shall be quality-assured at least semiannually using cylinder gas audits (CGAs) in accordance with 40 CFR Part 60, Appendix F, Procedure 1, § 5.1.2, with the following exception: a relative accuracy test audit is not required once every four quarters (i.e., two successive semiannual CGAs may be conducted). An equivalent quality-assurance method approved by the TCEQ may also be used. Successive semiannual audits shall occur no closer than four months. Necessary corrective action shall be taken for all CGA exceedances of ± 15 percent accuracy and any continuous emissions monitoring system downtime in excess of 5 percent of the incinerator operating time. These occurrences and corrective actions shall be reported to the appropriate TCEQ Regional Director on a quarterly basis. Supplemental stack concentration measurements may be required at the discretion of the appropriate TCEQ Regional Director.

Quality assured (or valid) data must be generated when the thermal oxidizer is operating except during the performance of a daily zero and span check. Loss of valid data due to periods of monitor break down, out-of-control operation (producing inaccurate data), repair, maintenance, or calibration may be exempted provided it does not exceed 5 percent of the time (in minutes) that the thermal oxidizer operated over the previous rolling 12 month period. The measurements missed shall be estimated using engineering judgment and the methods used recorded.

Fugitives

Piping, Valves, Pumps, and Compressors in contact with Hydrogen Fluoride - 28AVO

8. Except as may be provided for in the Special Conditions of this permit, the following requirements apply to the above-referenced equipment:
- A. Audio, olfactory, and visual checks for leaks within the operating area shall be made every four hours.

- B. Immediately, but no later than one hour upon detection of a leak, plant personnel shall take at least one of the following actions:
- (1) Isolate the leak.
 - (2) Commence repair or replacement of the leaking component.
 - (3) Use a leak collection/containment system to prevent the leak until repair or replacement can be made if immediate repair is not possible.

Date and time of each inspection shall be noted in the operator's log or equivalent. Records shall be maintained at the plant site of all repairs and replacements made due to leaks. These records shall be made available to representatives of the Texas Commission on Environmental Quality (TCEQ) upon request.

Initial Determination of Compliance

9. The permit holder shall perform stack sampling and other testing as required to establish the actual pattern and quantities of air contaminants being emitted into the atmosphere from the thermal oxidizers to demonstrate compliance with the MAERT and Special Condition Nos. 6.A and 7.A. The permit holder is responsible for providing sampling and testing facilities and conducting the sampling and testing operations at his expense. Sampling shall be conducted in accordance with the appropriate procedures of the Texas Commission on Environmental Quality (TCEQ) Sampling Procedures Manual and the U.S. Environmental Protection Agency (EPA) Reference Methods.

Requests to waive testing for any pollutant specified in this condition shall be submitted to the TCEQ Office of Air, Air Permits Division. Test waivers and alternate/equivalent procedure proposals for Title 40 Code of Federal Regulation Part 60 (40 CFR Part 60) testing which must have EPA approval shall be submitted to the TCEQ Regional Director.

- A. The appropriate TCEQ Regional Office shall be notified not less than 45 days prior to sampling. The notice shall include:
- (1) Proposed date for pretest meeting.
 - (2) Date sampling will occur.
 - (3) Name of firm conducting sampling.
 - (4) Type of sampling equipment to be used.
 - (5) Method or procedure to be used in sampling.
 - (6) Description of any proposed deviation from the sampling procedures specified in this permit or TCEQ/EPA sampling procedures.
 - (7) Procedure/parameters to be used to determine worst case emissions.

The purpose of the pretest meeting is to review the necessary sampling and testing procedures, to provide the proper data forms for recording pertinent data, and to review the format procedures for the test reports. The TCEQ Regional Director must approve any deviation from specified sampling procedures.

- B. Air contaminants emitted from the thermal oxidizers to be tested for include (but are not limited to) VOC.

- C. Sampling shall occur within 60 days after achieving the maximum operating rate, but no later than 180 days after initial start-up of the facilities (or increase in production, as appropriate) and at such other times (identify the need for any periodic sampling here) as may be required by the TCEQ Executive Director. Requests for additional time to perform sampling shall be submitted to the appropriate regional office.
- D. The facility being sampled shall operate at maximum production during stack emission testing. These conditions/parameters and any other primary operating parameters that affect the emission rate shall be monitored and recorded during the stack test. Any additional parameters shall be determined at the pretest meeting and shall be stated in the sampling report. Permit conditions and parameter limits may be waived during stack testing performed under this condition if the proposed condition/parameter range is identified in the test notice specified in paragraph A and accepted by the TCEQ Regional Office. Permit allowable emissions and emission control requirements are not waived and still apply during stack testing periods.
- During subsequent operations, if the production is greater than that recorded during the test period, stack sampling shall be performed at the new operating conditions within 120 days. This sampling may be waived by the TCEQ Air Section Manager for the region.
- E. Copies of the final sampling report shall be forwarded to the offices below within 60 days after sampling is completed. Sampling reports shall comply with the attached provisions entitled "Chapter 14, Contents of Sampling Reports" of the TCEQ Sampling Procedures Manual. The reports shall be distributed as follows:
- One copy to the appropriate TCEQ Regional Office.
One copy to each local air pollution control program.
- F. Sampling ports and platform(s) shall be incorporated into the design of (source stack and EPN) according to the specifications set forth in the attachment entitled "Chapter 2, Guidelines for Stack Sampling Facilities" of the Texas Commission on Environmental Quality (TCEQ) Sampling Procedures Manual. Alternate sampling facility designs must be submitted for approval to the TCEQ Regional Director.

Disaster Review

10. The holder of this permit shall comply with EPA regulations on Chemical Accident Prevention Provisions promulgated in 40 CFR Part 68. The Risk Management Plan (RMP) shall be submitted to the TCEQ Office of Air, Air Permits Division prior to the date this site first exceeds a threshold quantity of hydrogen fluoride.

Chemical Flexibility

11. Except as provided for below, the use of compounds at the Exflur Research Corporation facility is limited to those identified in the permit application, PI-1 dated, July 7, 2021 (including subsequent submittals made during the permit application review process). New compounds may be added through the use of the procedure below, 30 TAC Chapter 106, or 30 TAC Chapter 116.
- A. Short-term (pounds per hour [lb/hr]) and annual (TPY) emissions and calculations shall be completed for each chemical at each affected source. Emission rates (ER) shall be calculated with the methods documented in the permit application PI-1 dated, July 7, 2021.

The calculated ER shall not exceed the maximum allowable emissions rate at any emission point.

- B. The Effect Screening Level (ESL) for the compound shall be obtained from the current TCEQ ESL list or by written request to the TCEQ Toxicology Section.
- C. The new compounds or chemicals shall serve the same basic function and the emissions shall be from the same location as the emissions from the current materials.
- D. All the compounds within a new mixture are known, i.e. the weight percentages of the ingredients add to 100 percent or more.
- E. Any air contaminant compound in a new mixture is exempt from the requirements of subparagraph F. below if it meets one of the following conditions:
 - (1) It is emitted at a rate and has a short-term Effects Screening Level (ESL) as stated in the following table; or

Emission Rate (lbs/hr)	Short-term ESL ($\mu\text{g}/\text{m}_3$)
≤ 0.04	≥ 2 & < 500
≤ 0.10	≥ 500 & $< 3,500$
≤ 0.40	$\geq 3,500$

- (2) It has a true vapor pressure at 68°F of less than 0.01 mm Hg.
- F. For all other new or increased air contaminants the following procedure shall be completed:
 - (1) Determine the emission rate (ER) of each air contaminant ingredient including emissions of the same air contaminant from currently authorized materials that may be emitted at the same time from each emission point.
 - (2) Multiply the emission rate of the air contaminant by the unit impact multiplier for each emission point from the following table to determine the off-property impact (Ground Level Concentration (GLC)) for each emission point.

Emission Point	Unit Impact ($\mu\text{g}/\text{m}_3$ per lb/hr)
EP3-1	415.37
EP3-2	56.87
EP3-3	57.54
FUG3-1	37.36
FUG3-2	57.59
FUG3-3	55.58
FUG3-4	55.87

- (3) Sum the impacts from each emission point/emission point group to determine a total off-property impact (Total GLC_{MAX}) for the new or increased air contaminant.
- (4) Compare the total off-property impact to the ESL for the air contaminant as

follows: $\text{Total GLC}_{\text{MAX}} \leq \text{ESL}_{\text{NEW}}$

Where:

$\text{Total GLC}_{\text{MAX}}$ = the sum of the GLCs from each emission point.

ESL_{new} = short-term ESL of new ingredient air contaminant from the most current ESL list published by the TCEQ or as specifically derived by TCEQ Toxicology Section. The ESL shall be obtained in writing prior to the use of the new or increased air contaminant.

- G. Short-term emission rates from new or increased air contaminants shall not cause any increases in air contaminant category annual emission rates as listed on the maximum allowable emission rates table (MAERT).
- H. The permit holder shall maintain records of the information below and the demonstrations in steps A through C above. The following documentation is required for each compound:
- (1) Chemical name(s), composition, and chemical abstract registry number if available.
 - (2) True vapor pressure at maximum hourly and annual average storage temperature.
 - (3) Molecular weight.
 - (4) Storage tanks, loading areas, and fugitive areas where the material is to be handled and the emission control device to be utilized.
 - (5) Date new compound handling commenced.
 - (6) Material Safety Data Sheet.
 - (7) Maximum concentration of the chemical in mole percent (or in weight percent for fugitive areas) in the affected facilities

Permit by Rule

12. The following sources and/or activities are authorized under a Permit by Rule (PBR) by Title 30 Texas Administrative Code Chapter 106 (30 TAC Chapter 106). These lists are not intended to be all inclusive and can be altered without modifications to this permit.

Authorization	Source or Activity
30 TAC § 106.263 (effective 11/01/01)	Routine Facility Maintenance

Date: _____ TBD _____

Emission Sources - Maximum Allowable Emission Rates

Permit Number 165848

This table lists the maximum allowable emission rates and all sources of air contaminants on the applicant's property covered by this permit. The emission rates shown are those derived from information submitted as part of the application for permit and are the maximum rates allowed for these facilities, sources, and related activities. Any proposed increase in emission rates may require an application for a modification of the facilities covered by this permit.

Air Contaminants Data

Emission Point No. (1)	Source Name (2)	Air Contaminant Name (3)	Emission Rates	
			lbs/hour	TPY (4)
EP3-1	Exhaust Gas Vent System, Thermal Oxidizer 1, and Thermal Oxidizer 2	VOC	0.16	0.14
		NO _x	0.03	0.13
		CO	0.04	0.18
		PM	<0.01	0.02
		PM ₁₀	<0.01	0.02
		PM _{2.5}	<0.01	0.02
		HF	<0.01	0.03
		HCl	0.02	0.09
		F ₂	<0.01	<0.01
		Br ₂	<0.01	<0.01
		HBr	<0.01	<0.01
	Exempt organic compounds	1.05	4.40	
EP3-2	Washing Reactor 1	VOC	0.73	0.20
EP3-3	Washing Reactor 2	VOC	0.98	0.27
EP3-4	Water Reservoir	VOC	< 0.01	0.02
FUG3-1	Building 3 Fugitives (5)	VOC	1.75	7.67
		HF	0.13	0.56
		F ₂	0.10	0.45
		Br ₂	0.14	0.60
		H ₂	0.06	0.26
		Exempt organic compounds	1.65	7.21
FUG3-2	Reduction Reactor 1 Fugitives (5)	VOC	0.03	0.13
		HCl	0.01	0.03

Application Exhibit 21

TCEQ ED and Applicant Correspondence on Amended/Consolidated NORI/NAPD Public Notice

From: arloe.fontenot@exfluor.com
Sent: Monday, May 2, 2022 2:42 PM
To: Cara Hill
Cc: eric.bierschenk@exfluor.com; bierschenk_t@exfluor.com
Subject: RE: publication dates

Hi Cara,

Williamson County Sun will run **Wednesday May 4**
El Mundo Alternative language paper will run **Thursday May 5**

Also thank you the clarification between Centigrade and Fahrenheit made in error.

Thank you and the TCEQ for your help.

Regards,

Arloe Fontenot
EHS Manager
Exfluor Research Corp
Round Rock, Texas
C: 225-636-1010
O: 512-310-9044
exfluor.com



From: Cara Hill <Cara.Hill@Tceq.Texas.Gov>
Sent: Monday, May 2, 2022 1:09 PM
To: arloe.fontenot@exfluor.com
Cc: eric.bierschenk@exfluor.com
Subject: publication dates

Hi Arloe,

When you know which day the amended notice ran in the papers, could you let me know those dates for both English and Spanish?

Thanks,
Cara Hill
TCEQ Air Permits
512-239-5123

How is our customer service? www.tceq.texas.gov/customersurvey

From: ElecRsp
Sent: Wednesday, April 27, 2022 4:39 PM
To: bierschenk_t@exfluor.com; R6AirPermitsTX@EPA.gov
Cc: Cara Hill
Subject: 165848 - Public Notice - NORI & NAPD - Exfluor Research Corporation - 331049
Attachments: 165848_331049_Public Notice - NORI & NAPD_6052006.docx;
165848_331049_Conditions_6052011.docx;
165848_331049_MAERT_6052012.docx

Please see attached documents.

Texas Commission on Environmental Quality

Air Permits Division

(512) 239-1250

From: arloe.fontenot@exfluor.com
Sent: Wednesday, April 27, 2022 5:49 PM
To: Cara Hill
Cc: eric.bierschenk@exfluor.com
Subject: RE: Amended PN2 package

Hi Cara,

Thanks so much for sending over. I'll get the amended notices in tomorrow, asap in the same 2 papers.

Regards,

Arloe Fontenot

EHS Manager
Exfluor Research Corp
Round Rock, Texas
C: 225-636-1010
O: 512-310-9044
exfluor.com



From: Cara Hill <Cara.Hill@Tceq.Texas.Gov>
Sent: Wednesday, April 27, 2022 4:03 PM
To: arloe.fontenot@exfluor.com
Cc: eric.bierschenk@exfluor.com
Subject: Amended PN2 package

Hi Arloe,

We're still waiting on the mailout to be processed, so I've attached the amended public notice package. You will probably get another copy in the official email either later today or tomorrow. Let me know if you have any questions.

Thanks,
Cara Hill
TCEQ Air Permits
512-239-5123

How is our customer service? www.tceq.texas.gov/customersurvey

Application Exhibit 22

TCEQ Chief Clerk's Amended/Consolidated NORI/NAPD Mailing List

TCEQ Interoffice Memorandum

124292

To: Laurie Gharis, Chief Clerk

Thru: Bonnie Evridge, Manager
Mechanical/Coatings New Source Review Permits Section

From: Cara Hill
Expedite Team, Mechanical/Coatings New Source Review Permits Section

Date: April 27, 2022

Subject: **Amended Notice of Application and Preliminary Decision**

Exflor Research Corporation
Permit: 165848

We request that this amended notice be mailed to the established mailing list for the above referenced permit. First public notice for this permit was originally filed with the Chief Clerk's Office on July 15, 2021. Second public notice for this permit was originally filed with the Chief Clerk's Office on February 24, 2022. During the technical review, it was determined that air contaminants of particulate matter were erroneously left off the first and second public notices. The amended consolidated public notice correctly identifies all air contaminants proposed with this permit application.

THE HONORABLE DAWN BUCKINGHAM
TEXAS SENATE
DISTRICT ROOM E1.808
TEXAS STATE CAPITOL
Dawn.buckingham@senate.texas.gov

THE HONORABLE CHARLES
SCHWERTNER
TEXAS SENATE
DISTRICT ROOM 3E.10
TEXAS STATE CAPITOL
Charles.schwertner@senate.texas.gov

124292
THE HONORABLE JOHN BUCY
TEXAS HOUSE OF REPRESENTATIVES
DISTRICT ROOM E2.602
TEXAS STATE CAPITOL
john.bucy@house.texas.gov

THE HONORABLE JAMES TALARICO
TEXAS HOUSE OF REPRESENTATIVES
DISTRICT ROOM E2.418
TEXAS STATE CAPITOL
james.talarico@house.texas.gov

THE HONORABLE TERRY WILSON
TEXAS HOUSE OF REPRESENTATIVES
DISTRICT ROOM E2.714
TEXAS STATE CAPITOL
Terry.wilson@house.texas.gov

CAPITAL AREA COUNCIL OF GOVERN
6800 BURLESON RD STE 165
AUSTIN TX 78744-2325

CITY OF AUSTIN WATERSHED DEPT.
TPDES PERMIT
PO BOX 1088
AUSTIN TX 78767-1088

PUBLIC HEALTH REGION 7
TEXAS DEPARTMENT OF STATE HEAL
2408 S 37TH ST
TEMPLE TX 76504-7168

US ARMY CORPS OF ENGINEERS REG
CESWS-PER-R
PO BOX 17300
FORT WORTH TX 76102-0300

FIELD SUPERVISOR
US FISH & WILDLIFE SERVICE
10711 BURNET RD STE 200
AUSTIN TX 78758-4460

WILLIAMSON COUNTY & CITIES HEA
355 TEXAS AVE
ROUND ROCK TX 78664-2565

WILLIAMSON COUNTY JUDGE
710 S MAIN ST STE 101
GEORGETOWN TX 78626-5701

JIM BRIGGS
CITY OF GEORGETOWN UTILITY SYS
PO BOX 409
GEORGETOWN TX 78627-0409

MR MICHAEL THANE DIR OF UTI
CITY OF ROUND ROCK
2008 ENTERPRISE DR
ROUND ROCK TX 78664-2120

MR MICHAEL THANE DIR OF UTI
CITY OF ROUND ROCK
2008 ENTERPRISE DR
ROUND ROCK TX 78664

LAURALEE VALLON GENERAL CO
BRAZOS RIVER AUTHORITY
4600 COBBS DR
PO BOX 7555
WACO TX 76714-7555

COUNTY

THE HONORABLE TERRY M WILSON STATE
TEXAS HOUSE OF REPRESENTATIVES DIS
PO BOX 2910
AUSTIN TX 78768-2910

THE HONORABLE CHARLES SCHWERTNEF
THE SENATE OF TEXAS DISTRICT 5
PO BOX 12068
AUSTIN TX 78711-2068

COURTNEY ALCOTT
108 SAN MARINO TRL
GEORGETOWN TX 78633-4467

MAUDE MCCORMICK ALLEN
1251 COUNTY ROAD 208
FLORENCE TX 76527-4275

FEDERICO I ARCE
10116 ANDRE DR
IRVING TX 75063-5932

RACHEL AUSTIN
CITY OF JONESTOWN
PO BOX 5023
JONESTOWN TX 78645-0002

TAMI BAKER
BLUE LINE REALTY LLC
901 COUNTY ROAD 209
LIBERTY HILL TX 78642-3740

MR MARK BAKER
5420 COUNTY ROAD 236
LIBERTY HILL TX 78642-3743

MRS KRISTYN BARRY
1250 COUNTY ROAD 207
LIBERTY HILL TX 78642-3750

MS REBECCA BARTELS
PO BOX 1051
CEDAR PARK TX 78630-1051

ROBERT LIONEL BASKIND
165 MALLARD LN
LEANDER TX 78641-2709

SUZY BATES
16249 W STATE HIGHWAY 29
LIBERTY HILL TX 78642-3803

IP/PROT

105848

04/29/2022

APP-00577

STEPHEN BAUER
800 HIDDEN BEAR RD
LIBERTY HILL TX 78642-4634

DANIAL BEESLEY
709 OAK CREST LN
GEORGETOWN TX 78628-2622

DR. DON T BERRY
829 CASTLE RIDGE RD
AUSTIN TX 78746-5105

ANNE KATHRINE BEVILLE
443 COUNTY ROAD 278
LIBERTY HILL TX 78642-4378

JAMES BLAKE
604 PURPLE SALVIA CV
LIBERTY HILL TX 78642-2382

LANA BLAKE
604 PURPLE SALVIA CV
LIBERTY HILL TX 78642-2382

JOY BORJES
216 CAPSTONE RD
LIBERTY HILL TX 78642-3620

BARRY L BOWDEN
PURCELL FARM
708 COUNTY ROAD 208
FLORENCE TX 76527-4751

TWILA BOWDEN
708 COUNTY ROAD 208
FLORENCE TX 76527-4751

GEN RICHARD ARTHUR BOX
2504 SPRING LN
AUSTIN TX 78703-1743

DR. WHITNEY BRACE
611 COWBOY TRL
LIBERTY HILL TX 78642-4019

LINDSEY BRASSFIELD
516 WARLANDER WAY
GEORGETOWN TX 78626-4353

ASHLEY BROOKS
111 CREEKSIDE DR
LIBERTY HILL TX 78642-3936

CHRISTOPHER BUNCH
101 MILESTONE RD
LIBERTY HILL TX 78642-4409

JAIME CADWALADER
105 RETAMA TREE TRCE
LIBERTY HILL TX 78642-2223

ALEX CAMPO
PO BOX 40
WEIR TX 78674-0040

SUSAN G CARLSON
128 N SHOWHORSE DR
LIBERTY HILL TX 78642-3928

MR JOHN J CARLTON
THE CARLTON LAW FIRM PLLC
STE B130
4301 WESTBANK DR
AUSTIN TX 78746-6568

MR ROBERT CARWELL
6600 COUNTY ROAD 200
LIBERTY HILL TX 78642-3725

SHARON H CASSADY
1541 ORCHARD DR
LEANDER TX 78641-1370

MONICA CASTRO
1630 COUNTY ROAD 279
LIBERTY HILL TX 78642-4299

RANDA CHAPMAN
1244 COUNTY ROAD 202
LIBERTY HILL TX 78642-2335

JAMES R CLARNO
108 TRINITY LN
GEORGETOWN TX 78633-4118

CONCERNED CITIZEN
CITY OF AUSTIN - AUSTIN WATER UTILITY
ATTN DIRECTOR
PO BOX 1088
AUSTIN TX 78767-1088

VICCI CONWAY
668 SPEED HORSE
LIBERTY HILL TX 78642-4782

NOELKE COTTON
LAW DEPARTMENT CITY OF AUSTIN
PO BOX 1088
AUSTIN TX 78767-1088

BETTY & CHESTER CRITCHFIELD
PECAN SPRINGS RANCH
801 COUNTY ROAD 344
JARRELL TX 76537-1194

MR ERIC CROP
1799 COUNTY ROAD 223
FLORENCE TX 76527-4231

GRANT CROSS
158 BARN OWL LOOP
LEANDER TX 78641-1881

KAREN CROSS
31161 RIVERWOOD RD
MILLSBORO DE 19966-7299

165848

IP / PROT

04/29/2022

VASANTHA DACHA
13811 BOYLE LN
FRISCO TX 75035-0375

CORWIN E DAVIDSON
100 CLEAR CREEK RD
LIBERTY HILL TX 78642-3719

PAUL DAVIDSON
100 CLEAR CREEK RD
LIBERTY HILL TX 78642-3719

ERIN DEBARBIERI
109 NORTHERN HARRIER CT
LEANDER TX 78641-4524

AMY B DECOSMO
120 RETAMA TREE TRCE
LIBERTY HILL TX 78642-2223

MENGBING DONG
905 UMBRELLA SKY
LIBERTY HILL TX 78642-2233

JANET ELLIS
223 CARRIAGE OAKS DR
LIBERTY HILL TX 78642-3853

MR GUY ENDSLEY
4600 COUNTY ROAD 207
LIBERTY HILL TX 78642-3799

LAUREN ENDSLEY
4600 COUNTY ROAD 207
LIBERTY HILL TX 78642-3799

MORGAN ENDSLEY
4600 COUNTY ROAD 207
LIBERTY HILL TX 78642-3799

TANYA ENDSLEY
4600 COUNTY ROAD 207
LIBERTY HILL TX 78642-3799

DR. FRANCESCA C ESTRADA
249 COWBOY TRL
LIBERTY HILL TX 78642-3954

TYLER ANDREW EYRE
305 RIDGE VIEW DR
GEORGETOWN TX 78628-6899

JENNIFER EYRE
305 RIDGE VIEW DR
GEORGETOWN TX 78628-6899

MS SHERYL MARIE FARLEY
6600 COUNTY ROAD 200
LIBERTY HILL TX 78642-3725

MRS JEANNIE FICKEL
2775 COUNTY ROAD 207
LIBERTY HILL TX 78642-3778

ANTHONY FIGGINS
101 QUARRY ROCK LOOP
LIBERTY HILL TX 78642-4039

AMANDA FOSTER
132 LOCKHART DR
LIBERTY HILL TX 78642-2318

DAVID O FREDERICK
PERALES ALLMON & ICE PC
1206 SAN ANTONIO ST
AUSTIN TX 78701-1834

ELIZABETH ANN FRIOU
5203 RIDGE OAK DR
AUSTIN TX 78731-4811

KATHERINE FULLER
177 EAGLE OWL LOOP
LEANDER TX 78641-2712

JILLIAN GABRIEL
105 LARK ST
LEANDER TX 78641-1890

ANNA GANDY
211 NORMAL SCHOOL WAY
LIBERTY HILL TX 78642-4892

BRITNI GANZE
205 WESTON DR
LIBERTY HILL TX 78642-5560

BRANDON GARCIA
441 FALCON LN
LEANDER TX 78641-1771

KYLE GEHRER
1200 COUNTY ROAD 236
FLORENCE TX 76527-4850

SHANNON GEHRER
1200 COUNTY ROAD 236
FLORENCE TX 76527-4850

MR WILLIAM PATRICK GEORGE
2301 COUNTY ROAD 223
FLORENCE TX 76527-4214

RICHARD GRABISH
201 SHADY OAKS TRL
LIBERTY HILL TX 78642-3944

JUDY GRACI
15775 BOOTH CIR
VOLENTE TX 78641-9684

1105848

IP/PRINT

01/29/2022

APP-00579

KATLYN GREEN
221 KING ELDER LN
LEANDER TX 78641-1738

CHARLES GROSS
5731 COUNTY ROAD 236
LIBERTY HILL TX 78642-2300

CHRISTI LACHELLE GUTIERREZ
218 QUARRY ROCK LOOP
LIBERTY HILL TX 78642-4040

HEINRICH HAFNER
6750 COUNTY ROAD 200
LIBERTY HILL TX 78642-3974

DENELLE HAGER
5900 COUNTY ROAD 236
LIBERTY HILL TX 78642

KELLEY HEATH
205 TALON GRASP TRL
LEANDER TX 78641-2595

CHELSEY HEIL
516 TALON GRASP TRL
LEANDER TX 78641-3414

BRENDA HENDRICKSON
137 TORDESILLAS DR
GEORGETOWN TX 78626

JAMES HENLEY
304 TANAGER PASS
LEANDER TX 78641-3841

ED HILLIS
1012 COUNTRY CLUB RD
GEORGETOWN TX 78628-3514

LORAIN HOANE
4920 N INTERSTATE 35
AUSTIN TX 78751-2716

JULIA HOLLIS
1025 LEEDS CASTLE WALK
GEORGETOWN TX 78626-8031

M D HOSSAIN
CITY OF KILLEEN
PUBLIC WORKS/ENGINEERING
200 E AVENUE D
KILLEEN TX 76541-5228

LIZ HOWELLS
1818 BLUFFWOOD PL
ROUND ROCK TX 78665-5610

RIMA HUQ
4913 STRADA DR
ROUND ROCK TX 78665-2265

LAUREN ICE
PERALES ALLMON & ICE PC
1206 SAN ANTONIO ST
AUSTIN TX 78701-1834

MONICA JACOBS
KELLY HART & HALLMAN LLP
STE 2000
303 COLORADO ST
AUSTIN TX 78701-4653

ANDREA JAGODZINSKI
216 CAPITAL HILL VW
LIBERTY HILL TX 78642-2241

SHAWN JAGODZINSKI
216 CAPITAL HILL VW
LIBERTY HILL TX 78642-2241

BRIAN S JALUFKA
1650 COUNTY ROAD 204
LIBERTY HILL TX 78642-3586

SABRINA JANNISE
116 CHICKADEE LN
LEANDER TX 78641-2703

TIFFANY JOHNSON
2500 COUNTY ROAD 207
LIBERTY HILL TX 78642-4044

SUZANNE JOHNSON
JOHNSON WOODS
1400 COUNTY ROAD 236
FLORENCE TX 76527

MATTHEW JOHNSON
900 COUNTY ROAD 202
LIBERTY HILL TX 78642-3767

MR & MRS GARY JOHNSON
1011 RED CLIFF DR
AUSTIN TX 78758-5133

CATHERINE JOHNSTON
4960 HIGHWAY 138
FLORENCE TX 76527-4901

MRS CHESLEY JONES
100 GOLDEN EAGLE LN
LEANDER TX 78641-2717

CORY R JUBY
826 LINGER LN
AUSTIN TX 78721-3650

HEMANTH KHAMBHAMMETTU
401 NORTHCREST DR
LIBERTY HILL TX 78642-2392

TIMOTHY KING
157 CASCATA WAY
LIBERTY HILL TX 78642-2125

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24/29/2022

DOLORES KING
157 CASCATA WAY
LIBERTY HILL TX 78642-2125

DAVID KUBIN
741 R O RANCH RD
LIBERTY HILL TX 78642-3977

ARUN KUMAR
905 UMBRELLA SKY
LIBERTY HILL TX 78642-2233

LARS KUSLICH
PO BOX 1908
LIBERTY TX 77575-1908

MRS ERICA LADDEN
104 KINGFISHER LN
LEANDER TX 78641-3421

KIMM LANGSTON
113 ESPERANZA PETAL PASS
LIBERTY HILL TX 78642-2221

LAUREN LARSON
101 POST OAK RANCH RD
LIBERTY HILL TX 78642-3559

KATRINA D LEAL
400 KINGFISHER LN
LEANDER TX 78641-1796

GWYNETH LONERGAN
PERALES ALLMON & ICE PC
1206 SAN ANTONIO ST
AUSTIN TX 78701-1834

STEPHANIE LONG
237 CALERA ST
LIBERTY HILL TX 78642-2192

DANI LOPEZ
541 PEACE DR
LIBERTY HILL TX 78642-2258

BABU MADALA
1501 COUNTY ROAD 223
FLORENCE TX 76527-4259

NELSON MAK
812 GABRIEL MILLS DR
ROUND ROCK TX 78664-7911

ALYCEN MALONE
158 BARN OWL LOOP
LEANDER TX 78641-1881

MRS NICHOLE MANTHEY
140 FLOYDS RUN
BERTRAM TX 78605-4807

BRYAN MARTIN
2112 BEAR CREEK DR
LEANDER TX 78641-4471

MRS SHERRI MARTIN
1450 COUNTY ROAD 208
FLORENCE TX 76527-4276

CHUCK & DALE L MARTIN
APT 152
10600 JOLLYVILLE RD
AUSTIN TX 78759-6276

CHUCK & DALE L MARTIN
187 ESTRELLA XING
GEORGETOWN TX 78628-6973

KEN MARTIN PE
MARTIN PRATER & ASSOCIATES
2109 CRAIG PATRICK WAY
AUSTIN TX 78748-3537

LINDA MARTINEZ
1044 RIVER RNCH
LIBERTY HILL TX 78642-4890

MARY MASSEY
270 COLE DR
LIBERTY HILL TX 78642-4511

MRS STACY MATTISON
151 FALON LN
LIBERTY HILL TX 78642-4321

EMMA MAY
112 LOCKLIN DR
LIBERTY HILL TX 78642-2137

MR BRYCE P MCCORMICK
NORTH SAN GABRIEL ALLIANCE
1250 COUNTY ROAD 208
FLORENCE TX 76527-4628

TIMOTHY MCDANIEL
1800 COUNTY ROAD 208
FLORENCE TX 76527-4235

T J MCDONALD
900 COUNTY ROAD 236
FLORENCE TX 76527-4835

LYLE A MCELDERRY
406 WYNDHAM HILL PKWY
TEMPLE TX 76502-1974

KELLEY MCGHIE
304 REMUDA
LIBERTY HILL TX 78642-4550

RONAL DALTON MCLOUD
4810 COUNTY ROAD 207
LIBERTY HILL TX 78642-4023

1125848

IP 1P20T

04/29/2022

APP-00581

SUSAN MECKEL
LOWER COLORADO RIVER AUTHORITY
L106
PO BOX 220
AUSTIN TX 78767-0220

ANDRES MENDEZ
330 MISTY WOOD
BERTRAM TX 78605-4486

MRS NOOR AGHA MENDEZ
330 MISTY WOOD
BERTRAM TX 78605-4486

ALLISON METCALFE
1200 ASH DR
MARBLE FALLS TX 78654-7231

ANDREW S MILLER
KEMP SMITH LLP
STE 205
2905 SAN GABRIEL ST
AUSTIN TX 78705

KAREN MILONE
208 N HAVEN DR
LIBERTY HILL TX 78642-2387

KENNETH MOHR
PO BOX 1686
CEDAR PARK TX 78630-1686

MONICA MONK
750 ABBEY RD
LIBERTY HILL TX 78642-3996

JAMES MONK
750 ABBEY RD
LIBERTY HILL TX 78642-3996

CONNIE MOORE
112 HOOT OWL LN N
LEANDER TX 78641-1727

HENRY N MULVIHILL JR
PO BOX 831945
RICHARDSON TX 75083-1945

PATRICIA MULVIHILL
NORTH SAN GABRIEL ALLIANCE
8 LUNDYS LN
RICHARDSON TX 75080-2343

SHEILA NARDELLI
530 ABBEY RD
LIBERTY HILL TX 78642-3994

ROSANA NAREZ
PO BOX 93331
SOUTHLAKE TX 76092-0113

ROSANA NAREZ
TEX-MEX NEWS
PO BOX 8665
WACO TX 76714-8665

CASEY NASH
7603 ISLANDER DR
AUSTIN TX 78749-3028

CINDY NASH
205 ENCORE DR
LIBERTY HILL TX 78642-2147

JAKE NORMAN
1500 COUNTY ROAD 225
FLORENCE TX 76527-3852

NICK NOVO
116 SHADY OAKS TRL
LIBERTY HILL TX 78642-3945

SARAH NOVO
116 SHADY OAKS TRL
LIBERTY HILL TX 78642-3945

MARK NUNEZ
CITY OF HUTTO
356 COUNTY ROAD 199
HUTTO TX 78634-4271

MRS BRITTNEY ORTIZ
120 COUNTY ROAD 279
LIBERTY HILL TX 78642-4245

MR JOE OWEN
OWEN HOLDINGS
4718 MILL CREEK RD
DALLAS TX 75244-6916

MRS REBECCA R OWENS
20307 MCSHEPHERD RD
GEORGETOWN TX 78626-9320

MRS HEATHER PACHECO
201 COWBOY TRL
LIBERTY HILL TX 78642-3954

LAURIE F PAIR
PO BOX 5908
AUSTIN TX 78763-5908

JEROME PALMER
333 HIDDEN OAKS LN
LIBERTY HILL TX 78642-3726

MR CARVEY LEE PARKJER
105 ROSA DR
LIBERTY HILL TX 78642-2190

TANARA PATEL
128 RAVELLO ST
LIBERTY HILL TX 78642-2306

EMILY PATTERSON
140 PARRYI CV
LEANDER TX 78641-4720

1105848

IP/P/ROT

md/09/2022

BONNIE PEARSON
5545 COUNTY ROAD 200
LIBERTY HILL TX 78642-3721

RON PEARSON
5545 COUNTY ROAD 200
LIBERTY HILL TX 78642-3721

RENEE PEYTON
132 KRUPP AVE
LIBERTY HILL TX 78642-4476

CHRIS PEYTON
132 KRUPP AVE
LIBERTY HILL TX 78642-4476

CARLA PICINICH
2101 COUNTY ROAD 226
FLORENCE TX 76527-4868

PATTI PORTER
411 BLESSING RANCH RD
LIBERTY HILL TX 78642-4588

BRYAN PRIMROSE
3901 COUNTY ROAD 258
LIBERTY HILL TX 78642-2106

GINA RAHBARI
232 HOOT OWL LN N
LEANDER TX 78641-1733

TRAVIS REDDING
595 GATLIN RANCH RD
LIBERTY HILL TX 78642-3312

BESSIE RHODES
14814 KINGSFORD WILLOW LN
CYPRESS TX 77429-7918

JAMES RICHARDSON
131 SADDLE LN
LIBERTY HILL TX 78642-4065

LARRY A RIDOLFI
FTL DRIVES INC
1051 COUNTY ROAD 204
LIBERTY HILL TX 78642-3792

DAVID RIVERA
105 LARK ST
LEANDER TX 78641-1890

ERIKA RIX
251 COUNTY ROAD 203
LIBERTY HILL TX 78642-3714

RANDAL ROBBINS
249 COWBOY TRL
LIBERTY HILL TX 78642-3954

WHITNEY ROBBINS
441 SIERRA MAR LOOP
LEANDER TX 78641-3544

CHRIS ROBION
104 REINDEER WAY
GEORGETOWN TX 78626-2547

MARK ROCKE
6433 COUNTY ROAD 200
LIBERTY HILL TX 78642-4026

MARIA YOLANDA ROCKE
6433 COUNTY ROAD 200
LIBERTY HILL TX 78642-4026

KATY ROSS
614 SAN GABRIEL RANCH RD
LIBERTY HILL TX 78642-4555

MARGARET RUSSELL
RR 1 BOX 35
TEXHOMA OK 73949-9719

CHARLES RUSSELL
RR 1 BOX 93
TEXHOMA OK 73949-9634

SUSAN RUSSELL
RR 1 BOX 93
TEXHOMA OK 73949-9634

LEM RUSSELL
PO BOX 1294
STRATFORD TX 79084-1294

CARI SALAZAR
301 DANIEL XING
LIBERTY HILL TX 78642-4499

KENNETH & RITA SCHOEN
1437 SLAWSON LN
KILLEEN TX 76542-4271

BRIAN SCOTT
300 ABBEY RD
LIBERTY HILL TX 78642-3953

BILL SHIER
8429 BANGOR BND
AUSTIN TX 78758-7901

NINA SMART
212 KINGFISHER LN
LEANDER TX 78641-2691

STEVEN SMELTZER
ALAMO AREA COUNCIL OF GOVERNMENTS
STE 160
8700 TESORO DR
SAN ANTONIO TX 78217-6208

1105848

ID/PROT

04/29/2022

STEVEN SMELTZER
ALAMO AREA COUNCIL OF GOVERNMENTS
STE 110
2700 NE LOOP 410
SAN ANTONIO TX 78217-4840

WANDA SMITH
900 COUNTY ROAD 236
FLORENCE TX 76527-4835

ROBERT SMITH
923 CASHEW LN
CEDAR PARK TX 78613-3241

MR S SORENSON
BRUSH BEND PROPERTY OWNERS ASSOC
901 BRUSHY BEND DR
ROUND ROCK TX 78681-1401

MICHELE STANFIELD
100 BUTTERCUP TRL
GEORGETOWN TX 78633-4746

HEATHER STONEHILL
441 FALCON LN
LEANDER TX 78641-1771

HEATHER STONEHILL-GARCIA
LOCAL RESIDENT
441 FALCON LN
LEANDER TX 78641-1771

TIFFANY STOUT
405 LAKE SIDE DR
GEORGETOWN TX 78628-6902

MR THOMAS L SWINT
2809 FRESH SPRING RD
PFLUGERVILLE TX 78660-2381

CALVIN TAIT
103 RIO ANCHO BLVD
LIBERTY HILL TX 78642-3570

JEN TAYLOR
193 HOUSEFINCH LOOP
LEANDER TX 78641-1961

MICHAEL D THANE
3400 SUNRISE RD
ROUND ROCK TX 78665-2398

TIM THRASH
865 COUNTY ROAD 208
FLORENCE TX 76527-4865

ALLISON THRASH
15100 FM 2769
VOLENTE TX 78641-9139

SANDRA LEE THURMAN
190 COUNTY ROAD 208
FLORENCE TX 76527-4472

MASON TINSLEY
11 N BENTON WOODS CIR
THE WOODLANDS TX 77382-1513

SUZE TREACY
2710 GLENWOOD TRL
CEDAR PARK TX 78613-5128

TERESA TUCKER
5050 COUNTY ROAD 236
LIBERTY HILL TX 78642-3730

PAUL KEITH TURNER
377 SUNDANCE TRL
LIBERTY HILL TX 78642-3851

TRACEY VAANDRAGER
701 BRIZENDINE RD
LIBERTY HILL TX 78642-3991

BRITTANY D VARNER
PO BOX 1532
LIBERTY HILL TX 78642-1532

LAURA S WALLACE
3204 AZTEC FALL CV
AUSTIN TX 78746-1573

FRANKIE WALLER
80 COUNTY ROAD 208
FLORENCE TX 76527-4484

HAROLD C WARDLAW
19910 PARK RNCH
SAN ANTONIO TX 78259-1934

SUSAN M WARHOL
1260 COUNTY ROAD 208
FLORENCE TX 76527-4628

JASON WATKINS
308 BLESSING RANCH RD
LIBERTY HILL TX 78642-4505

NIKKI WATKINS
51 COUNTY ROAD 153
GEORGETOWN TX 78626-1926

NANCY WEBBER
4128 LAWLESS ST
AUSTIN TX 78723-5393

SCOTT WEISSE
212 RIETI PKWY
LIBERTY HILL TX 78642-2309

CHARLES WEMPE
6589 COUNTY ROAD 200
LIBERTY HILL TX 78642-3983

165848

IP/PROT

04/29/2022

APP-00584

GREGORY J WHITE IND PRETREAT
CEDAR PARK PUBLIC WORKS DEPT
2315 BRUSHY CREEK LOOP
CEDAR PARK TX 78613-3162

SHANNON WHITE-SHUBERT
3404 CORTINA LN
ROUND ROCK TX 78681-2417

KIMBERLY WHITNEY
475 COUNTY ROAD 218
FLORENCE TX 76527-4634

SKYLER WHITTLESEY
220 ARREZO LN
GEORGETOWN TX 78628-7071

MR KEITH WILCOX
PO BOX 640
FLORENCE TX 76527-0640

HAZIEL WILLIAMS
19926 PARK HOLW
SAN ANTONIO TX 78259-1924

CHARLES R WILLIAMS
19926 PARK HOLW
SAN ANTONIO TX 78259-1924

ASHLEY WILLIAMS
APT 136
1616 W DALLAS ST
HOUSTON TX 77019-4770

SAMANTHA WOOLF
305 LA DERA DR
LIBERTY HILL TX 78642-2122

MR ROBERT WOOLF
305 LA DERA DR
LIBERTY HILL TX 78642-2122

IP / PROT

11 DEC 2022

04/29/2022

Application Exhibit 23

TCEQ and Applicant Correspondence on Draft Special Conditions

From: Cara Hill
Sent: Thursday, April 28, 2022 12:34 PM
To: arloe.fontenot@exfluor.com
Cc: eric.bierschenk@exfluor.com; bierschenk_t@exfluor.com
Subject: RE: Amended PN2 package
Attachments: RE: 165848 Exfluor Research (Initial, 331049); RE: Exfluor Permit No. 165848 Application; RE: Exfluor Permit No. 165848 Application

Hi Arloe,

I looked into the thermal oxidizer temperature and attached the emails from the permit condition negotiation. It looks like Joerg's comments specified 2000 C (first attachment) and then the conditions were subsequently revised and accepted. This temperature should be the minimum temperature the control device must operate at in order to achieve the claimed destruction efficiency. It typically comes from the manufacturer. After the first stack test, the temperature is adjusted based on the results of the stack test. Since it was agreed to and the draft permit issued, I think it will need to be issued as is, but you can come back in with an application to renegotiate that temperature if it is incorrect.

For the signs, the only thing that is changing with the amended notice is the language in notice, so the sign requirements aren't changing.

Let me know if you have any questions.

Thanks,
Cara

How is our customer service? www.tceq.texas.gov/customersurvey

From: arloe.fontenot@exfluor.com <arloe.fontenot@exfluor.com>
Sent: Wednesday, April 27, 2022 7:23 PM
To: Cara Hill <Cara.Hill@Tceq.Texas.Gov>
Cc: eric.bierschenk@exfluor.com; bierschenk_t@exfluor.com
Subject: RE: Amended PN2 package

Hi Cara,

I forgot to ask, do we need to make changes to the signs posted on the property?
And speaking with Tom, under Thermal Oxidizers Special Conditions Part B...wanted to verify if you meant 2000 deg F instead of 2000 deg C in reference to the thermal oxidizer firebox exit temperature...

Thanks,

Arloe

From: arloe.fontenot@exfluor.com <arloe.fontenot@exfluor.com>
Sent: Wednesday, April 27, 2022 5:49 PM
To: 'Cara Hill' <Cara.Hill@Tceq.Texas.Gov>

Cc: 'eric.bierschenk@exfluor.com' <eric.bierschenk@exfluor.com>

Subject: RE: Amended PN2 package

Hi Cara,

Thanks so much for sending over. I'll get the amended notices in tomorrow, asap in the same 2 papers.

Regards,

Arloe Fontenot

EHS Manager
Exfluor Research Corp
Round Rock, Texas
C: 225-636-1010
O: 512-310-9044
exfluor.com



From: Cara Hill <Cara.Hill@Tceq.Texas.Gov>

Sent: Wednesday, April 27, 2022 4:03 PM

To: arloe.fontenot@exfluor.com

Cc: eric.bierschenk@exfluor.com

Subject: Amended PN2 package

Hi Arloe,

We're still waiting on the mailout to be processed, so I've attached the amended public notice package. You will probably get another copy in the official email either later today or tomorrow. Let me know if you have any questions.

Thanks,
Cara Hill
TCEQ Air Permits
512-239-5123

How is our customer service? www.tceq.texas.gov/customersurvey

Application Exhibit 24

Amended/Consolidated and Corrected
NORI/NAPD Proof of Publication
(Affidavits/Tearsheets for English Version)

TCEQ-Office of the Chief Clerk
MC-105 Attn: Notice Team
P.O. Box 13087
Austin, Texas 78711-3087

Applicant Name: Exflur Research Corporation
Permit No.: 165848
Application Received Date: July 9, 2021

AFFIDAVIT OF PUBLICATION FOR AIR PERMITTING

STATE OF TEXAS §
COUNTY OF Williamson §

BEFORE ME, the undersigned authority, on this day personally appeared

Kathry Manasco, who being by me duly sworn, deposes and says that (s)he is (Name of Person Representing Newspaper)

the General manager of the Williamson County Sun
(Title of Person Representing Newspaper) (Name of the Newspaper)

that said newspaper is generally circulated in Florence, Texas;
(The municipality or nearest municipality to the location of the facility or the proposed facility)

that the enclosed notice was published in said newspaper on the following date(s):

May 4, 2022
Kathry Manasco
(Newspaper Representative's Signature)

Subscribed and sworn to before me this the 17th day of June, 2022
to certify which witness my hand and seal of office.



[Affix Seal]

Dawn Steele
Notary Public in and for the State of Texas
Dawn Steele
Print or Type Name of Notary Public
8-26-2024
My Commission Expires

TCEQ-Office of the Chief Clerk
MC-105 Attn: Notice Team
P.O. Box 13087
Austin, Texas 78711-3087

Applicant Name: Exflur Research Corporation
Permit No.: 165848
Application Received Date: July 9, 2021

124292

AFFIDAVIT OF PUBLICATION FOR AIR PERMITTING

STATE OF TEXAS §
COUNTY OF Williamson §

BEFORE ME, the undersigned authority, on this day personally appeared

Ellen Greeney, who being by me duly sworn, deposes and says that (s)he is (Name of Person Representing Newspaper)

the Archivist of the Williamson County Sun
(Title of Person Representing Newspaper) (Name of the Newspaper)

that said newspaper is generally circulated in Florence Texas;
(The municipality or nearest municipality to the location of the facility or the proposed facility)

that the enclosed notice was published in said newspaper on the following date(s):

May 4, 2022
Ellen Greeney
(Newspaper Representative's Signature)

Subscribed and sworn to before me this the 1st day of May, 2022
to certify which witness my hand and seal of office.

[Affix Seal]



Notary Public in and for the State of Texas
Dawn R. Steele
Print or Type Name of Notary Public
08 26. 2024
My Commission Expires

Blue VIN# Charges + Tax per 1/20 2022. charged by June 15. Auction of the vehicle with waiver of vehicle consent public sale.

NON INTY OF

RESTED U ROSE, 501-CP4, Williamson g Street.

l, in the d estate, wll, 2022. ERMINE N FOR TION OF EEMENT ENDENT id estate id Court eirs and V ROSE, respective late.

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Applicant l entitled day of N FOR IS OF TRATION SHIP of that the heirs RODNEY IED, and interest in

at 10:00 Monday lays from station, at e Center County.

60 - 15 Gallon Arizona Cypress
10 - 30 Gallon Crepe Myrtle

Texas Commission on Environmental Quality



AMENDED CONSOLIDATED NOTICE OF RECEIPT OF APPLICATION AND INTENT TO OBTAIN PERMIT AND NOTICE OF APPLICATION AND PRELIMINARY DECISION

PROPOSED PERMIT NUMBER: 165846

APPLICATION AND PRELIMINARY DECISION. Edfluor Research Corporation, 2350 Double Creek Dr, Round Rock, Texas 78684-3801, has applied to the Texas Commission on Environmental Quality (TCEQ) for issuance of Proposed Air Quality Permit Number 165846, which would authorize construction of a Edfluor Research located at 1100 County Road 236, Florence, Williamson County, Texas 76527. This application was processed in an expedited manner, as allowed by the commission's rules in 30 Texas Administrative Code, Chapter 101, Subchapter J. This application was submitted to the TCEQ on July 9, 2021. The proposed facility will emit the following contaminants: carbon monoxide, hydrogen fluorides, hazardous air pollutants, nitrogen oxides, organic compounds, and particulate matter including particulate matter with diameters of 10 microns or less and 2.5 microns or less.

The executive director has completed the technical review of the application and prepared a draft permit which, if approved, would establish the conditions under which the facility must operate. The executive director has made a preliminary decision to issue the permit because it meets all rules and regulations. The permit application, executive director's preliminary decision, and draft permit will be available for viewing and copying at the TCEQ central office, the TCEQ Austin regional office, and at the Eula Hunt Beck Florence Public Library, 207 East Main Street, Williamson County, Texas, beginning the first day of publication of this notice. The facility's compliance file, if any exists, is available for public review at the TCEQ Austin Regional Office, 12100 Park 35 Circle Building A Room 179, Austin, Texas.

PUBLIC COMMENT. You may submit public comments to the Office of the Chief Clerk at the address below. The TCEQ will consider all public comments in developing a final decision on the application and the executive director will prepare a response to those comments.

PUBLIC MEETING. You may request a public meeting to the

Office of the Chief Clerk at the address below. The purpose of a public meeting is to provide the opportunity to submit comments or ask questions about the application. A public meeting about the application will be held if requested by an interested person and the executive director determines that there is a significant degree of public interest in the application or if requested by a local legislator. A public meeting is not a contested case hearing.

OPPORTUNITY FOR A CONTESTED CASE HEARING. You may request a contested case hearing if you are a person who may be affected by emissions of air contaminants from the facility. If requesting a contested case hearing, you must submit the following: (1) your name (or for a group or association, an official representative), mailing address, and daytime phone number; (2) applicant's name and permit number; (3) the statement "[I/we] request a contested case hearing"; (4) a specific description of how you would be adversely affected by the application and air emissions from the facility in a way not common to the general public; (5) the location and distance of your property relative to the facility; (6) a description of how you use the property which may be impacted by the facility; and (7) a list of all disputed issues of fact that you submit during the comment period. If the request is made by a group or an association, one or more members who have standing to request a hearing must be identified by name and physical address. The interests the group or association seeks to protect must also be identified. You may also submit your proposed adjustments to the application/permit which would satisfy your concerns.

The deadline to submit a request for a contested case hearing is 30 days after newspaper notice is published. If a request is timely filed, the deadline for requesting a contested case hearing will be extended to 30 days after the mailing of the response to comments.

If a hearing request is timely filed, following the close of all applicable comment and request periods, the Executive Director will forward the application and any requests for contested case hearing to the Commissioners for their consideration at a scheduled Commission meeting. The Commission may only grant a request for a contested case hearing on issues the requestor submitted in their timely comments that were not subsequently withdrawn. If a hearing is granted, the subject of a hearing will be limited to disputed issues of fact or mixed questions of fact and law relating to relevant and material air quality concerns submitted during the comment period. Issues such as property values, noise, traffic safety, and zoning are outside of the

Commission's jurisdiction to address in this proceeding.

RESPONSE TO COMMENTS AND EXECUTIVE DIRECTOR ACTION. After the deadline for public comments, the executive director will consider the comments and prepare a response to all relevant and material or significant public comments. Because no timely hearing requests have been received, after preparing the response to comments, the executive director may then issue final approval of the application. The response to comments, along with the executive director's decision on the application will be mailed to everyone who submitted public comments or is on a mailing list for this application, and will be posted electronically to the Commissioners' Integrated Database (CID).

INFORMATION AVAILABLE ONLINE. When they become available, the executive director's response to comments and the final decision on this application will be accessible through the Commission's Web site at www.tceq.texas.gov/goto/cid. Once you have access to the CID using the above link, enter the permit number for this application which is provided at the top of this notice. This link to an electronic map of the site or facility's general location is provided as a public courtesy and not part of the application or notice. For exact location, refer to application. <http://www.tceq.texas.gov/assets/public/hb510/index.html?rate=30.781111&lng=97.804168&zoom=13&type=st>.

MAILING LIST. You may ask to be placed on a mailing list to obtain additional information on this application by sending a request to the Office of the Chief Clerk at the address below.

AGENCY CONTACTS AND INFORMATION. Public comments and requests must be submitted either electronically at www.tceq.texas.gov/epic/aComment/, or in writing to the Texas Commission on Environmental Quality, Office of the Chief Clerk, MC-105, P.O. Box 13087, Austin, Texas 78711-3087. Please be aware that any contact information you provide, including your name, phone number, email address and physical address will become part of the agency's public record. For more information about this permit application or the permitting process, please call the Public Education Program toll free at 1-800-687-4040. Si desea información en Español, puede llamar al 1-800-687-4040.

Further information may also be obtained from Edfluor Research Corporation at the address stated above or by calling Dr. Thomas Bierschenk, PhD, Vice President at (512) 310-9044.

Amended Notice Issuance Date: April 27, 2022

Paul Worrall

From: Cara Hill
Sent: Wednesday, June 15, 2022 9:25 AM
To: PROOFS
Subject: FW: Amended PN2 NSD Affidavit -Williamson County Sun 165848
Attachments: Wilco Sun Affidavit 165848 Amended PN 5.4.2022.pdf; Wilco Sun Notice 5.4.2022.pdf

From: arloe.fontenot@exfluor.com <arloe.fontenot@exfluor.com>
Sent: Monday, May 16, 2022 3:49 PM
To: Cara Hill <Cara.Hill@Tceq.Texas.Gov>
Cc: eric.bierschenk@exfluor.com; bierschenk_t@exfluor.com
Subject: Amended PN2 NSD Affidavit -Williamson County Sun 165848

Hi Cara,

See attached publication & affidavit of the amended PN2 which ran on May 4, 2022.
Awaiting affidavit for El Mundo.
Reach out if any questions.

Thanks,

Arloe Fontenot
EHS Manager
Exfluor Research Corp
Round Rock, Texas
C: 225-636-1010
O: 512-310-9044
exfluor.com



TCEQ-Office of the Chief Clerk
MC-105 Attn: Notice Team
P.O. Box 13087
Austin, Texas 78711-3087

Applicant Name: Exflour Research Corporation
Permit No.: 165848
Application Received Date: July 9, 2021

AFFIDAVIT OF PUBLICATION FOR AIR PERMITTING

STATE OF TEXAS §
COUNTY OF Williamson §

BEFORE ME, the undersigned authority, on this day personally appeared

Ellen Greeney, who being by me duly sworn, deposes and says that (s)he is (Name of Person Representing Newspaper)

the Archivist of the Williamson County Sun
(Title of Person Representing Newspaper) (Name of the Newspaper)

that said newspaper is generally circulated in Florence Texas;
(The municipality or nearest municipality to the location of the facility or the proposed facility)

that the enclosed notice was published in said newspaper on the following date(s):

May 4, 2022
Ellen Greeney
(Newspaper Representative's Signature)

Subscribed and sworn to before me this the 1st day of May, 2022
to certify which witness my hand and seal of office.

[Affix Seal]



Notary Public in and for the State of Texas
Dawn R. Steele
Print or Type Name of Notary Public
08.26.2024
My Commission Expires

Blue VIN# Charges + Tax per 2022. charged by June 15th auction of the vehicle. waiver of the vehicle consents public sale.

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60 - 15 Gallon Arizona Cypress
10 - 30 Gallon Crepe Myrtle



AMENDED CONSOLIDATED NOTICE OF RECEIPT OF APPLICATION AND INTENT TO OBTAIN PERMIT AND NOTICE OF APPLICATION AND PRELIMINARY DECISION

PROPOSED PERMIT NUMBER: 165846

APPLICATION AND PRELIMINARY DECISION. Exflur Research Corporation, 2350 Double Creek Dr, Round Rock, Texas 78664-3801, has applied to the Texas Commission on Environmental Quality (TCEQ) for Issuance of Proposed Air Quality Permit Number 165846, which would authorize construction of a Exflur Research located at 1100 County Road 236, Florence, Williamson County, Texas 76527. This application was processed in an expedited manner, as allowed by the commission's rules in 30 Texas Administrative Code, Chapter 101, Subchapter J. This application was submitted to the TCEQ on July 9, 2021. The proposed facility will emit the following contaminants: carbon monoxide, hydrogen fluorides, hazardous air pollutants, nitrogen oxides, organic compounds, and particulate matter including particulate matter with diameters of 10 microns or less and 2.5 microns or less.

The executive director has completed the technical review of the application and prepared a draft permit which, if approved, would establish the conditions under which the facility must operate. The executive director has made a preliminary decision to issue the permit because it meets all rules and regulations. The permit application, executive director's preliminary decision, and draft permit will be available for viewing and copying at the TCEQ central office, the TCEQ Austin regional office, and at the Eula Hunt Beck Florence Public Library, 207 East Main Street, Williamson County, Texas, beginning the first day of publication of this notice. The facility's compliance file, if any exists, is available for public review at the TCEQ Austin Regional Office, 12100 Park 35 Circle Building A Room 179, Austin, Texas.

PUBLIC COMMENT. You may submit public comments to the Office of the Chief Clerk at the address below. The TCEQ will consider all public comments in developing a final decision on the application and the executive director will prepare a response to those comments.

PUBLIC MEETING. You may request a public meeting to the

Office of the Chief Clerk at the address below. The purpose of a public meeting is to provide the opportunity to submit comments or ask questions about the application. A public meeting about the application will be held if requested by an interested person and the executive director determines that there is a significant degree of public interest in the application or if requested by a local legislator. A public meeting is not a contested case hearing.

OPPORTUNITY FOR A CONTESTED CASE HEARING. You may request a contested case hearing if you are a person who may be affected by emissions of air contaminants from the facility. If requesting a contested case hearing, you must submit the following: (1) your name (or for a group or association, an official representative), mailing address, and daytime phone number; (2) applicant's name and permit number; (3) the statement "[I/we] request a contested case hearing"; (4) a specific description of how you would be adversely affected by the application and air emissions from the facility in a way not common to the general public; (5) the location and distance of your property relative to the facility; (6) a description of how you use the property which may be impacted by the facility; and (7) a list of all disputed issues of fact that you submit during the comment period. If the request is made by a group or an association, one or more members who have standing to request a hearing must be identified by name and physical address. The interests the group or association seeks to protect must also be identified. You may also submit your proposed adjustments to the application/permit which would satisfy your concerns.

The deadline to submit a request for a contested case hearing is 30 days after newspaper notice is published. If a request is timely filed, the deadline for requesting a contested case hearing will be extended to 30 days after the mailing of the response to comments.

If a hearing request is timely filed, following the close of all applicable comment and request periods, the Executive Director will forward the application and any requests for contested case hearing to the Commissioners for their consideration at a scheduled Commission meeting. The Commission may only grant a request for a contested case hearing on issues the requestor submitted in their timely comments that were not subsequently withdrawn. If a hearing is granted, the subject of a hearing will be limited to disputed issues of fact or mixed questions of fact and law relating to relevant and material air quality concerns submitted during the comment period. Issues such as property values, noise, traffic safety, and zoning are outside of the

Commission's jurisdiction to address in this proceeding.

RESPONSE TO COMMENTS AND EXECUTIVE DIRECTOR ACTION. After the deadline for public comments, the executive director will consider the comments and prepare a response to all relevant and material or significant public comments. Because no timely hearing requests have been received, after preparing the response to comments, the executive director may then issue final approval of the application. The response to comments, along with the executive director's decision on the application will be mailed to everyone who submitted public comments or is on a mailing list for this application, and will be posted electronically to the Commissioners' Integrated Database (CID).

INFORMATION AVAILABLE ONLINE. When they become available, the executive director's response to comments and the final decision on this application will be accessible through the Commission's Web site at www.tceq.texas.gov/goto/cid. Once you have access to the CID using the above link, enter the permit number for this application which is provided at the top of this notice. This link to an electronic map of the site or facility's general location is provided as a public courtesy and not part of the application or notice. For exact location, refer to application. <http://www.tceq.texas.gov/assets/public/hb610/index.html?lat=30.791111&lng=-97.904168&z=13&type=r>.

MAILING LIST. You may ask to be placed on a mailing list to obtain additional information on this application by sending a request to the Office of the Chief Clerk at the address below.

AGENCY CONTACTS AND INFORMATION. Public comments and requests must be submitted either electronically at www14.tceq.texas.gov/spic/eComment/, or in writing to the Texas Commission on Environmental Quality, Office of the Chief Clerk, MC-105, P.O. Box 13087, Austin, Texas 78711-3087. Please be aware that any contact information you provide, including your name, phone number, email address and physical address will become part of the agency's public record. For more information about this permit application or the permitting process, please call the Public Education Program toll free at 18006874040. Si desea información en Español, puede llamar al 1-800-687-4040.

Further information may also be obtained from Exflur Research Corporation at the address stated above or by calling Dr. Thomas Bierschenk PhD, Vice President at (512) 310-9044.

Amended Notice Issuance Date: April 27, 2022

From: arloe.fontenot@exfluor.com
Sent: Monday, May 16, 2022 3:49 PM
To: Cara Hill
Cc: eric.bierschenk@exfluor.com; bierschenk_t@exfluor.com
Subject: Amended PN2 NSD Affidavit -Williamson County Sun 165848
Attachments: Wilco Sun Affidavit 165848 Amended PN 5.4.2022.pdf; Wilco Sun Notice 5.4.2022.pdf

Hi Cara,

See attached publication & affidavit of the amended PN2 which ran on May 4, 2022.
Awaiting affidavit for El Mundo.
Reach out if any questions.

Thanks,

Arloe Fontenot
EHS Manager
Exfluor Research Corp
Round Rock, Texas
C: 225-636-1010
O: 512-310-9044
exfluor.com



Application Exhibit 25

TCEQ Chief Clerk and Applicant Correspondence on Public Meeting Notice

Georgia Carroll-Warren

From: bierschenk_t@exfluoer.com
Sent: Thursday, May 12, 2022 1:37 PM
To: Deanna Avalos
Subject: RE: Request Applicant Review of Draft Notice: Exfluoer Research Corporation; Proposed Permit No. 165848

Deanna,

The notice states that if anyone has questions they can contact me at the above address. It should probably say that I can be reached at:

Tom Bierschenk
Exfluoer Research Corporation
2350 Double Creek Dr.
Round Rock, TX 78664

Everything else looks OK.

Tom

From: Deanna Avalos <Deanna.Avalos@tceq.texas.gov>
Sent: Thursday, May 12, 2022 10:30 AM
To: bierschenk_t@exfluoer.com
Subject: Request Applicant Review of Draft Notice: Exfluoer Research Corporation; Proposed Permit No. 165848
Importance: High

RE: Applicant Review of Draft Public Meeting Notice

Mr. Bierschenk,

Attached is the draft Public Meeting Notice for Exfluoer Research Corporation; Proposed Permit No. 165848. **Please review the notice for accuracy and completeness by COB on Friday, May 13, 2022.** Respond with approval as is or with corrections. Once the notice is complete, the Office of the Chief Clerk will officially issue the notice to the Applicant/Representatives and to persons that have written to TCEQ regarding the permit.

The address you provided below cites the zip code 76513. I found on the HS webpage the following:

Florence High School, 401 FM 970, Florence, TX 76527

Please confirm the correct zip code and I will update the notice if necessary.

The notice will not be considered complete until I receive an email response from you.

Please provide an address for mailed copy of the notice. You will also receive a copy sent by email.

Thank you,
Deanna Avalos
TCEQ Office of the Chief Clerk

Deanna.Avalos@tceq.texas.gov

From: bierschenk_t@exfluor.com <bierschenk_t@exfluor.com>

Sent: Wednesday, May 11, 2022 6:30 PM

To: Deanna Avalos <Deanna.Avalos@tceq.texas.gov>

Subject: RE: Venue for Public Meeting: Exfluor Research Corporation; Proposed Permit No. 165848

Deanna,

The meeting will be held on June 16, 2022 at 7 pm

Place:

Florence High School Cafeteria
401 FM 970
Florence, TX 76513

Contact:

Eric Banfield
Business Manager
Florence ISD
254-793-2850 ext. 2225

Thanks,

Tom Bierschenk

From: Deanna Avalos <Deanna.Avalos@tceq.texas.gov>

Sent: Wednesday, May 11, 2022 11:49 AM

To: bierschenk_t@exfluor.com

Cc: Brad Patterson <Brad.Patterson@tceq.texas.gov>

Subject: RE: Venue for Public Meeting: Exfluor Research Corporation; Proposed Permit No. 165848

Importance: High

Hello Tom,

I am aware you and Brad have been communicating regarding the status of the venue.

I am concerned that If the school continues to be non-responsive or does not grant your request, we are losing necessary processing time. Do you have alternative options for a venue?

In order to provide sufficient notice to the mailing prior to a June 16 meeting date, we need to finalize a venue soon to allow for the processing of the notice.

Please submit the following information by COB on Friday, May 13, 2022:

- Date of meeting – June 16, 2022 at 7:00 PM
- **Name of the venue where the meeting is going to be held**

- **Physical address of venue**
- **Contact name and phone number for the venue**

Please let Brad or I know if you have any questions.

Thank you,
Deanna Avalos

From: Deanna Avalos
Sent: Thursday, May 5, 2022 11:31 AM
To: bierschenk_t@exfluor.com
Cc: Brad Patterson <Brad.Patterson@tceq.texas.gov>
Subject: RE: TCEQ Public Meeting Update: Exfluor Research Corporation; Proposed Permit No. 165848

Hi Tom,

I am just checking in to see if you received any feedback from the high school?

From: bierschenk_t@exfluor.com <bierschenk_t@exfluor.com>
Sent: Monday, May 2, 2022 2:00 PM
To: Deanna Avalos <Deanna.Avalos@tceq.texas.gov>
Subject: RE: TCEQ Public Meeting Update: Exfluor Research Corporation; Proposed Permit No. 165848

Deanna,

I will try to book the cafeteria. To whom are the notices mailed? Will it be sent to those that have commented?

Tom

From: Deanna Avalos <Deanna.Avalos@tceq.texas.gov>
Sent: Monday, May 02, 2022 1:07 PM
To: bierschenk_t@exfluor.com
Cc: Brad Patterson <Brad.Patterson@tceq.texas.gov>
Subject: RE: TCEQ Public Meeting Update: Exfluor Research Corporation; Proposed Permit No. 165848

Tom,

High school cafeterias are often used so please proceed. If there is any issue or delay from the high school, please let us what your other options are.

No newspaper publication is required for an air public meeting notice, only mailed notice by TCEQ. Our goal is to issue notice 30 days prior to the meeting, but there is a little flexibility with that timeframe.

From: bierschenk_t@exfluor.com <bierschenk_t@exfluor.com>
Sent: Monday, May 2, 2022 1:02 PM
To: Deanna Avalos <Deanna.Avalos@tceq.texas.gov>
Subject: RE: TCEQ Public Meeting Update: Exfluor Research Corporation; Proposed Permit No. 165848

Deanna,

It looks like the closest venue that I can find is the Florence High School Cafeteria. Is that an acceptable venue? If so, I will see if I can rent it. How many days prior to the meeting must the notice go out? Also, will the notice be sent to the Florence newspaper? I believe that is where the permit notice was sent.

Tom

From: Deanna Avalos <Deanna.Avalos@tceq.texas.gov>

Sent: Monday, May 02, 2022 8:14 AM

To: bierschenk t@exfluor.com

Subject: TCEQ Public Meeting Update: Exfluor Research Corporation; Proposed Permit No. 165848

Importance: High

RE: Suggested Date for the Meeting: **June 16, 2022**

Dear Mr. Bierschenk,

I have coordinated with the offices of Rep. Wilson and Sen. Schwertner and based on their feedback and TCEQ staff availability, we may proceed in scheduling the public meeting for **June 16, 2022**.

The applicant is responsible for contracting a venue for the meeting. Please see the attached guidelines for contracting a venue. Once you have responded with the required information, TCEQ may proceed with the processing of the notice.

Please let me know if you have any questions.

Thank you,
Deanna Avalos
TCEQ Office of the Chief Clerk

Georgia Carroll-Warren

From: Deanna Avalos
Sent: Friday, May 13, 2022 11:18 AM
To: Georgia Carroll-Warren
Cc: Brad Patterson
Subject: Request Issuance of Notice: Exflur Research Corporation; Proposed Permit No. 165848
Attachments: 165848_Exflur_PM Notice_EDedit.docx; RE: Request Applicant Review of Draft Notice: Exflur Research Corporation; Proposed Permit No. 165848

Georgia,

Attached is the final public meeting notice for Exflur Research Corporation; Proposed Permit No. 165848. Also attached is the applicant approval.

Please mail on Tuesday, May 17, 2022. Also send a courtesy email of the notice on the same day as mail out to the applicant contact(s). No publication is required.

The contact(s) information is as follows:

Email:

Tom Bierschenk at bierschenk_t@exflur.com

Phone:

Tom Bierschenk at 512-310-9044

Address:

Tom Bierschenk
Exflur Research Corporation
2350 Double Creek Dr.
Round Rock, TX 78664

Please let me know if you have any questions.

Thank you,
Deanna

Georgia Carroll-Warren

From: Georgia Carroll-Warren
Sent: Tuesday, May 17, 2022 8:06 AM
To: bierschenk_t@exfluor.com
Subject: PUBLIC MEETING NOTICE - EXFLUOR RESEARCH CORPORATION - PROPOSED PERMIT NO 165848
Attachments: 165848_PUBLIC MEETING.pdf
Importance: High

Good Morning:

Please find attached document for the **NOTICE OF PUBLIC MEETING FOR AN AIR QUALITY PERMIT PROPOSED PERMIT NUMBER 165848** for EXFLUOR RESEARCH CORPORATION.

Hard copy of the attached document will be mailed to Mr. Tom Bierschenk. No publication is required.

The Public Meeting is to be held:


**Thursday, June 16 at 7:00 PM
Florence High School (Cafeteria)
401 FM 970**

Florence, Texas 76527

Please confirm receipt of this email. Should you have any questions or concerns, please contact me by email.

Thank you for your assistance.

Georgia Carroll-Warren
Texas Commission on Environmental Quality (TCEQ)
Office of the Chief Clerk, Notice Team Work Leader
Phone: (512) 239-3314
georgia.carroll-warren@tceq.texas.gov

 Please consider whether it is necessary to print this e-mail.



How is our customer service? www.tceq.texas.gov/customersurvey

Application Exhibit 26

Amended/Consolidated and Corrected
NORI/NAPD Proof of Publication
(Affidavits/Tearsheets for Bilingual
Version)

TCEQ-Office of the Chief Clerk
MC-105 Attn: Notice Team
P.O. Box 13087
Austin, Texas 78711-3087

Applicant Name: Exflur Research Corporation
Permit No.: 165848
Application Received Date: July 9, 2021

AFFIDAVIT OF PUBLICATION FOR AIR PERMITTING

STATE OF TEXAS §
COUNTY OF Travis §

BEFORE ME, the undersigned authority, on this day personally appeared

Luis H. Diaz, who being by me duly sworn, deposes and says that (s)he is (Name of Person Representing Newspaper)

the Circulation Manager of the El Mundo Newspaper
(Title of Person Representing Newspaper) (Name of the Newspaper)

that said newspaper is generally circulated in Williamson County, Texas.
(The municipality or nearest municipality to the location of the facility or the proposed facility)

that the enclosed notice was published in said newspaper on the following date(s) May 19, 2022

Luis H. Diaz
(Newspaper Representative's Signature)

Subscribed and sworn to before me this the 19th day of May, 2022 to certify which witness my hand and seal of office.

[Affix Seal]



Angela Maria Angulo
Notary Public in and for the State of Texas

Print or Type Name of Notary Public

September 10, 2025
My Commission Expires

COMISION DE CALIDAD AMBIENTAL DE TEXAS

REUNION PUBLICA PARA PRESENTAR EL PLAN DE ACCION PARA EL MANEJO DEL AGUA EN TEXAS

El Comisionado de Recursos Ambientales y Protección del Medio Ambiente de Texas...

El Comisionado de Recursos Ambientales y Protección del Medio Ambiente...

El Comisionado de Recursos Ambientales y Protección del Medio Ambiente...

El Comisionado de Recursos Ambientales y Protección del Medio Ambiente...

El Comisionado de Recursos Ambientales y Protección del Medio Ambiente...

El Comisionado de Recursos Ambientales y Protección del Medio Ambiente...

El Comisionado de Recursos Ambientales y Protección del Medio Ambiente...

El Comisionado de Recursos Ambientales y Protección del Medio Ambiente...

EMPLEOS EMPLEOS EMPLEOS EMPLEOS EMPLEOS EMPLEOS

¡Estamos Contratando Personal de Limpieza! Tenemos Complejos Ayer a 12:30am - Lunes a Viernes...

Joyería en Austin SOLICITA PERSONAL BILINGUE con excelente presentación y actitud ganadora.

CONTRATACION INMEDIATA - Entrenamiento Pagado - Oportunidad de Ascenso - Se requiere transporte propio.

Austin Texas Insurance MetLife Safeco Kemper Mendota Progressive

Solicita Trabajadores de Construcción - Horario de Lunes a Viernes, pago semanal, de acuerdo a tu experiencia.

TU SUPERPODER ES TRABAJO EN EQUIPO? SORTEO MENSUAL DE APRECIACION DE LOS EMPLEADOS

OPORTUNIDAD DE EMPLEO FLEXIBLE - Habla español solamente ¡No Hay Problema! AHORA CONTRATANDO MANO DE OBRA GENERAL

Armada Towing ATX VIP Towing - ¡Gane al mes! 7508 Bluff Springs Rd • Austin, TX 78744

¡ESTAMOS CONTRATANDO! Segovia Produce, Inc. Busca cargadores y personal para la bodega

First Chinese BBQ BUSCA COCINERO con experiencia

VENTA COMPRA CARROS Y TRUCOS de computadoras o funcionamiento

SERVICIO Problemas de Salud? - SHALOM132

SOLICITO PERSONAL para limpieza de casas y departamentos

RENTA La Posada Mexican Restaurant - SOLICITA Cocineros y Ayudantes

RENTO ESTUDIO Y CUARTO para 1 persona o pareja

Code Builders Supply - ESTÁ CONTRATANDO AYUDANTE/TRABAJADOR PARA TURNO DE NOCHE

AHORA CONTRATANDO Carpinteros y obreros para trabajos de concreto en San Antonio

ADIÓS GRASA - Limpia tu sistema digestivo, te ayuda a quemar grasa, a controlar la ansiedad y perder peso de forma natural.

SOLICITA SERVIDORES, COCINEROS, PANADEROS Y LAVAPLATOS - Con disponibilidad de horario, Turno de tarde y debe trabajar fines de semana.

From: arloe.fontenot@exfluor.com
Sent: Thursday, May 19, 2022 2:40 PM
To: Cara Hill
Cc: eric.bierschenk@exfluor.com; bierschenk_t@exfluor.com
Subject: FW: Public Notice publication requested for TCEQ Air Permitted Facility located in Florence, Williamson County Texas
Attachments: Exfluor Affidavit.pdf; Exfluor 1x21 _ R040062 1x21 _ Mayo 19.pdf

Good afternoon Cara,

See amended PN2 in alternative language paper El Mundo running in today's issue May 19 .
Affidavit also attached.

As always reach out if any questions or concerns.

Thanks,

Arloe Fontenot
EHS Manager
Exfluor Research Corp
2350 Double Creek Dr
Round Rock, Texas 78664
C: 225-636-1010
O: 512-310-9044
exfluor.com

-----Original Message-----

From: 'Angela Angulo' <angela@elmondonewspaper.com>
Sent: Thursday, May 19, 2022 2:12 PM
To: arloe.fontenot@exfluor.com
Subject: RE: Public Notice publication requested for TCEQ Air Permitted Facility located in Florence, Williamson County Texas

Arloe,

Please find attached the notice and affidavit. Original will be in the mail today.

> On May 17, 2022 12:29 PM arloe.fontenot@exfluor.com wrote:
>
>
> Thank you Angela.
>
> Please proceed & use the credit card on file or send over another CC Auth form for payment when possible.
>

>
> Arloe Fontenot
> EHS Manager
> Exfluor Research Corp
> 2350 Double Creek Drive
> Round Rock, Texas 78664
> C: 225-636-1010
> O: 512-310-9044
> exfluor.com
>
>
>
>
> -----Original Message-----
> From: 'Angela Angulo' <angela@elmondnewspaper.com>
> Sent: Tuesday, May 17, 2022 11:09 AM
> To: arloe.fontenot@exfluor.com
> Subject: RE: Public Notice publication requested for TCEQ Air
> Permitted Facility located in Florence, Williamson County Texas
>
> Arloe,
>
> Betty does not have any emails from you regarding the notice.
> We will be able to publish the notice on May 19, 2022. Cost is \$490.
>
>
>> On May 17, 2022 10:48 AM arloe.fontenot@exfluor.com wrote:
>>
>>
>> Hi Angela,
>>
>> We would like the amended notice published in the next issue, as soon as possible .
>>
>> Thanks,
>>
>>
>> Arloe Fontenot
>> EHS Manager
>> Exfluor Research Corp
>>
>> Round Rock, Texas
>> C: 225-636-1010
>> O: 512-310-9044
>> exfluor.com
>>
>>
>>
>>

>> -----Original Message-----

>> From: arloe.fontenot@exfluor.com <arloe.fontenot@exfluor.com>

>> Sent: Tuesday, May 17, 2022 8:25 AM

>> To: 'Angela Angulo' <angela@elmondonewspaper.com>

>> Subject: FW: Public Notice publication requested for TCEQ Air

>> Permitted Facility located in Florence, Williamson County Texas

>>

>>

>>

>> -----Original Message-----

>> From: arloe.fontenot@exfluor.com <arloe.fontenot@exfluor.com>

>> Sent: Monday, May 2, 2022 2:21 PM

>> To: 'Betty@elmundo.com' <Betty@elmundo.com>

>> Subject: FW: Public Notice publication requested for TCEQ Air

>> Permitted Facility located in Florence, Williamson County Texas

>>

>> Hola Betty,

>> I just spoke with you about running the public notice again, with some added words.

>> The original proof & amended notice is attached.

>>

>>

>> On pg 2 the additional wording that needs to be translation into the notice are highlighted in yellow.

>> The additional wording is also below:

>>

>> "...and particulate matter including particulate matter with diameters of 10 microns or less and 2.5 microns or less."

>>

>>

>> Thank you!

>>

>>

>> Arloe Fontenot

>> EHS Manager

>> Exfluor Research Corp

>> 2350 Double Creek Dr

>> Round Rock, Texas 78664

>> C: 225-636-1010

>> O: 512-310-9044

>> exfluor.com

>>

>>

>>

>> -----Original Message-----

>> From: 'Angela Angulo' <angela@elmondonewspaper.com>

>> Sent: Thursday, March 10, 2022 11:44 AM

>> To: arloe.fontenot@exfluor.com

>> Cc: eric.bierschenk@exfluor.com

>> Subject: RE: Public Notice publication requested for TCEQ Air

>> Permitted Facility located in Florence, Williamson County Texas
>>
>> Good morning,
>>
>> Please find attached the affidavit and proof of publication. The originals will be in the mail today.
>>

>> Angela

>>

>>> On March 9, 2022 3:40 PM arloe.fontenot@exfluor.com wrote:

>>>

>>>

>>> Hi Angela;

>>>

>>>

>>> Exfluor Research Corporation

>>> Attn: Arloe Fontenot

>>> 2350 Double Creek Drive

>>> Round Rock, TX 78664

>>>

>>>

>>> Thanks!

>>>

>>>

>>>

>>> -----Original Message-----

>>> From: 'Angela Angulo' <angela@elmundonepaper.com>

>>> Sent: Wednesday, March 9, 2022 11:48 AM

>>> To: arloe.fontenot@exfluor.com

>>> Subject: RE: Public Notice publication requested for TCEQ Air

>>> Permitted Facility located in Florence, Williamson County Texas

>>>

>>> Arloe,

>>>

>>> Please send me your mailing address to mail the package with the Affidavit and copies of the paper.

>>>

>>> Thanks.

>>>

>>>

>>>

>>>> On March 2, 2022 1:50 PM arloe.fontenot@exfluor.com wrote:

>>>>

>>>>

>>>> Hi Angela,

>>>> Thank you. Please see attached. The two notices, 1 long and 1 short one (Example B) are on the first 3 pages & need to be translated.

>>>> The Alternative Language Affidavit of Publication for Air Permitting is on the last page.

>>>>

>>>> Appreciate your help.
>>>> And send over the final bill once everything is finished up.
>>>>
>>>> Thanks,
>>>>
>>>>
>>>> Arloe Fontenot
>>>> EHS Manager
>>>> Exfluor Research Corp
>>>> Round Rock, Texas
>>>> C: 225-636-1010
>>>> O: 512-310-9044
>>>> exfluor.com
>>>>
>>>>
>>>>
>>>>
>>>> -----Original Message-----
>>>> From: 'Angela Angulo' <angela@elmondnewspaper.com>
>>>> Sent: Wednesday, March 2, 2022 12:18 PM
>>>> To: arloe.fontenot@exfluor.com
>>>> Cc: eric.bierschenk@exfluor.com
>>>> Subject: RE: Public Notice publication requested for TCEQ Air
>>>> Permitted Facility located in Florence, Williamson County Texas
>>>>
>>>> Arloe,
>>>>
>>>> We can work with the notice either way. Our translation fee is
>>>> \$75
>>>>
>>>>
>>>>> On March 2, 2022 1:15 PM arloe.fontenot@exfluor.com wrote:
>>>>>
>>>>>
>>>>>> Hi Angela,
>>>>>> Thank you so much.
>>>>>> Do you also translate the notices if I send them in word?
>>>>>> Or would you like me to send over everything already translated?
>>>>>>
>>>>>> Thanks,
>>>>>>
>>>>>> Arloe Fontenot
>>>>>>
>>>>>> -----Original Message-----
>>>>>> From: Angela Angulo <angela@elmondnewspaper.com>
>>>>>> Sent: Wednesday, March 2, 2022 12:00 PM
>>>>>> To: arloe.fontenot@exfluor.com
>>>>>> Subject: Re: Public Notice publication requested for TCEQ Air

>>>> Permitted Facility located in Florence, Williamson County
>>>> Texas
>>>>
>>>> Arloe,
>>>>
>>>> You can email everything to us. The affidavit and copies of the paper will be mail to you after
publication date.
>>>>
>>>> Send me the file to verify which one are you running and provide you with the correct quote.
>>>>
>>>> Our next publication date is March 10, 2022.
>>>>
>>>>
>>>>
>>>>> On March 2, 2022 12:53 PM arloe.fontenot@exfluor.com wrote:
>>>>>
>>>>>
>>>>> Hi,
>>>>> I would like to publish a Notice of Application and Preliminary Decision for an Air Quality
Permit for our proposed facility located in Florence, Williamson County, Texas 76527.
>>>>> Per the guidelines of the TCEQ our notice has to be published in the same newspaper as our
first public notice.
>>>>> Please advise on if I should drop off the notices translated to your offices at 2519 E. 5th
Street, Austin, TX , as well as the Affidavit of Publication for Air Permitting, which has to be notarized.
>>>>> Or if you accept email versions of the 2 notices with instructions.
>>>>> For the last notice the contact was Ms. Irma Beatriz Portuonudo.
>>>>> Kindly please let me know.
>>>>> Thank you,
>>>>> Arloe Fontenot
>>>>> EHS Manager
>>>>> Exfluor Research Corp
>>>>> Round Rock, Texas
>>>>> C: 225-636-1010
>>>>> O: 512-310-9044
>>>>> exfluor.com
>>>>> (<https://nam11.safelinks.protection.outlook.com/?url=https%3A%2F%2Fexfluor.com%2F&data=05%7C01%7CCara.Hill%40Tceq.Te%40xas.Gov%7C0c2e73bbd9bf444ecf1c08da39cf7030%7C871a83a4a1ce4b7a81563bcd93a08fba%7C0%7C0%7C637885860661401897%7CUnknown%7CT%7C%7C%7C&sd=WFpbgZsb3d8eyJWljoimC4wLjAwMDAiLCJQIjoiv2luMzliLCJBTiI6lk1haWwiLCJXVCIMn0%3D%7C3000%7C%7C%7C&sd=CrnjcMuX2kQ2tliIhsCUYkUxl%2FI%2BI5o2wsd3Ea%2B2Bo%3D&reserved=0>)
>>>>>
>>>>> Angela M. Angulo
>>>>> Executive Director / Co-Publisher El Mundo Newspaper
>>>>> (512) 47- MUNDO (476-8636)
>>>>
>>>> Angela M. Angulo

>>> Executive Director / Co-Publisher El Mundo Newspaper
>>> (512) 47- MUNDO (476-8636)

>>>

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>>> Executive Director / Co-Publisher
>>> El Mundo Newspaper
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>>

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>

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> (512) 47- MUNDO (476-8636)

Angela M. Angulo
Executive Director / Co-Publisher
El Mundo Newspaper
(512) 47- MUNDO (476-8636)

TCEQ-Office of the Chief Clerk
MC-105 Attn: Notice Team
P.O. Box 13087
Austin, Texas 78711-3087

Applicant Name: Exfluor Research Corporation
Permit No.: 165848
Application Received Date: JULY 9, 2021

CID #: 124292

ALTERNATIVE LANGUAGE AFFIDAVIT OF PUBLICATION FOR AIR PERMITTING

STATE OF TEXAS §
COUNTY OF TRAVIS §

BEFORE ME, the undersigned authority, on this day personally appeared

LUIS H. DIAZ, who being by me duly sworn, deposes and says that (s)he is (Name of Person Representing Newspaper)

the CIRCULATION MANAGER of the EL MUNDO NEWSPAPER;
(Title of Person Representing Newspaper) (Name of the Newspaper)

that said newspaper is generally circulated in WILLIAMSON COUNTY, Texas;
(The municipality or county in which the facility or proposed facility is located)

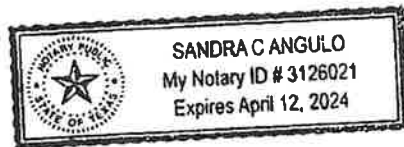
that the enclosed notice was published in said newspaper on the following date(s):
MAY 19, 2022

Luis H. Diaz
(Newspaper Representative's Signature)

Subscribe and sworn to before me this the 3RD day of AUGUST, 2022
to certify which witness my hand and seal of office.

Sandra Carolina Angulo
Notary Public in and for the State of Texas

[Affix Seal]



SANDRA CAROLINA ANGULO
Print or Type Name of Notary Public

APRIL 12, 2024
My Commission Expires

Paul Worrall

From: eric.bierschenk@exfluor.com
Sent: Thursday, August 4, 2022 8:10 AM
To: PROOFS
Subject: Corrected Alternative Language Affidavit
Attachments: Exfluor 20534 El Mundo.pdf

Correct form (20534) attached for Exfluor Research Corporation Air Permit 165848

Thanks, Eric

Eric Bierschenk
Exfluor Research Corporation
Round Rock, TX 78664

TCEQ-Office of the Chief Clerk
MC-105 Attn: Notice Team
P.O. Box 13087
Austin, Texas 78711-3087

Applicant Name Exfluor Research Corporation
Permit No.: 165848
Application Received Date: July 9, 2021

124292-C10

AFFIDAVIT OF PUBLICATION FOR AIR PERMITTING

STATE OF TEXAS §
COUNTY OF Travis §

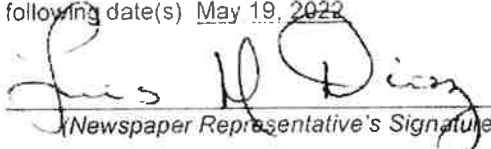
BEFORE ME the undersigned authority, on this day personally appeared

Luis H. Diaz, who being by me duly sworn, deposes and says that (s)he is (Name of Person Representing Newspaper)

the Circulation Manager of the El Mundo Newspaper
(Title of Person Representing Newspaper) (Name of the Newspaper)

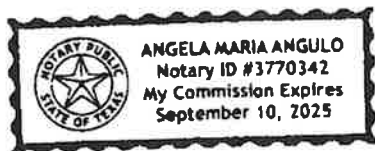
that said newspaper is generally circulated in Williamson County Texas
(The municipality or nearest municipality to the location of the facility or the proposed facility)


that the enclosed notice was published in said newspaper on the following date(s) May 19, 2022


(Newspaper Representative's Signature)

Subscribed and sworn to before me this the 19th day of May, 2022 to certify which witness my hand and seal of office.

[Affix Seal]




Notary Public in and for the State of Texas

Angela Maria Angulo

Print or Type Name of Notary Public

September 10, 2025
My Commission Expires

COMISION DE CALIDAD AMBIENTAL DE TEXAS

Resolución

El presente documento es parte de un proceso de toma de decisiones que incluye la participación pública y la revisión de los comentarios recibidos. Este documento no representa la decisión final de la Comisión de Calidad Ambiental de Texas.

Resumen de la Decisión

La Comisión de Calidad Ambiental de Texas (CQA) ha aprobado la solicitud de licencia ambiental para la construcción y operación de una planta de procesamiento de residuos sólidos en el sitio ubicado en el Condado de Travis, Texas. La licencia se otorga por un período de cinco años, con opción de renovación por períodos iguales de cinco años.

Resumen de los Comentarios Recibidos

Se recibieron un total de 15 comentarios de miembros del público durante el período de comentarios. Los comentarios se refirieron principalmente a preocupaciones sobre el impacto ambiental de la planta, específicamente en cuanto a la contaminación del agua y del aire, y el ruido. La CQA ha considerado todos los comentarios y ha tomado las medidas necesarias para mitigar los impactos ambientales.

Resumen de las Medidas de Mitigación

La licencia ambiental incluye condiciones de licencia que requieren que el solicitante implemente un plan de gestión ambiental que aborde las preocupaciones expresadas en los comentarios. Estas medidas incluyen:

- Implementar un programa de monitoreo de la calidad del agua y del aire.
- Instalar sistemas de control de ruido.
- Realizar estudios de impacto ambiental.
- Implementar un programa de gestión de residuos.

La CQA ha concluido que las medidas de mitigación propuestas son suficientes para garantizar que la planta opere de manera que no cause impactos ambientales significativos. La licencia ambiental se otorga en consecuencia.

Comisión de Salubridad Ambiental de Texas

Resolución

El presente documento es parte de un proceso de toma de decisiones que incluye la participación pública y la revisión de los comentarios recibidos. Este documento no representa la decisión final de la Comisión de Salubridad Ambiental de Texas.

Resumen de la Decisión

La Comisión de Salubridad Ambiental de Texas (CSA) ha aprobado la solicitud de licencia ambiental para la construcción y operación de una planta de procesamiento de residuos sólidos en el sitio ubicado en el Condado de Travis, Texas. La licencia se otorga por un período de cinco años, con opción de renovación por períodos iguales de cinco años.

Resumen de los Comentarios Recibidos

Se recibieron un total de 15 comentarios de miembros del público durante el período de comentarios. Los comentarios se refirieron principalmente a preocupaciones sobre el impacto ambiental de la planta, específicamente en cuanto a la contaminación del agua y del aire, y el ruido. La CSA ha considerado todos los comentarios y ha tomado las medidas necesarias para mitigar los impactos ambientales.

Resumen de las Medidas de Mitigación

La licencia ambiental incluye condiciones de licencia que requieren que el solicitante implemente un plan de gestión ambiental que aborde las preocupaciones expresadas en los comentarios. Estas medidas incluyen:

- Implementar un programa de monitoreo de la calidad del agua y del aire.
- Instalar sistemas de control de ruido.
- Realizar estudios de impacto ambiental.
- Implementar un programa de gestión de residuos.

La CSA ha concluido que las medidas de mitigación propuestas son suficientes para garantizar que la planta opere de manera que no cause impactos ambientales significativos. La licencia ambiental se otorga en consecuencia.

EMPLEOS

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8229 Burnet Rd.
Suite 402
Austin, TX 78757
www.TheJobody.com
(512) 860-5197
(737) 743-4639

EMPLEOS

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8229 Burnet Rd.
Suite 402
Austin, TX 78757
www.TheJobody.com
(512) 860-5197
(737) 743-4639

EMPLEOS

CONTRATACION INMEDIATA

- Entrenamiento Pagado.
- Beneficios
- Oportunidad de Crecimiento.
- Se requiere Idioma Ingles.

Si eres Bilingüe, aplica como:

- Hotel Roomer / In-Room Dining Server.
- House/Hotelier, Food Server.
- Live Cook, Front Desk Agent.

¡Solo hablas Español? Aplica ya mismo!

- Housekeeping House Attendant (Limpieza en General)
- Housekeeping Room Attendant (Limpieza de habitaciones)
- Cook/Asistente (Cocinas)

Hotel Granduca Austin (512) 306-6425
120 S Capital of Texas Hwy, West Lake Hills, TX 78746 (512) 306-6475

EMPLEOS

Austin Texas Insurance

MetLife
SafeCo
Kemper
Mendota
Progressive

* Auto * Casa
* Comercial
* Seguro de Vida

Lo estamos cobrando los domingos

(512) 672-9477

Reuben Rojas
7702 N Lamar Blvd, Ste 200
Austin, TX 78752

EMPLEOS

Solicita Trabajadores de Construcción

Horario de Lunes a Viernes, pago semanal, de acuerdo a tu experiencia

Preferiblemente con experiencia

El offer incluye: seguro médico, Seguro de Vida, 401K, Lluvia de Ventas de Seguro / Auto

7907 S FM 973 Austin, TX 78719 (512) 416-8678
(Sitio principal en DFW del centro de la industria)

EMPLEOS

TU SUPERPODER ES TRABAJO EN EQUIPO?

¡Te ofrecemos un trabajo que te permita usar tus habilidades de liderazgo y trabajo en equipo!

SORTEO MENSUAL DE APRECIACIÓN DE LOS EMPLEADOS

¡Gana un viaje a Las Vegas!

ES FÁCIL DE APLICAR HOY

¡Llama hoy! APLICAR - 800-843-4213

The Maids

EMPLEOS

Solicita Trabajadores de Construcción

Horario de Lunes a Viernes, pago semanal, de acuerdo a tu experiencia

Preferiblemente con experiencia

El offer incluye: seguro médico, Seguro de Vida, 401K, Lluvia de Ventas de Seguro / Auto

7907 S FM 973 Austin, TX 78719 (512) 416-8678
(Sitio principal en DFW del centro de la industria)

EMPLEOS

Armadá Towing

ATX VIP Towing

¡Gana el mes!

07/0000 a 08/0000
Tiempo Completo

7508 Bluff Springs Rd • Austin, TX 78744

CHOFERES DE GRÚAS

Operadores de Vehículos de Servicio de Camión con Licencia de Conducir

NO NECESITAN TENER EXPERIENCIA

Trabajo 8 días a la semana (512) 251-8884
* Vacaciones Pagadas
* Se Provee Equipo y Entrenamiento

Trabaja 8 días a la semana (512) 251-8884
* Vacaciones Pagadas
* Se Provee Equipo y Entrenamiento

EMPLEOS

OPORTUNIDAD DE EMPLEO FLEXIBLE

Habla español solamente (No Hay Problema!)

AHORAR CONTRATANDO

MANO DE OBRA GENERAL

para puestos de fabricación industrial ligera

- Horas flexibles para adaptarse a los horarios escolares
- Venga a trabajar después de dejar a sus hijos para la escuela y regrese a casa antes de que termine la escuela.
- 3-4 días a la semana
- Gane dinero extra sin la necesidad de una custodia guardería
- NO SE NECESITA EXPERIENCIA, LO CAPTAREMOS

Solicite en persona en:
807 Edgemoor Dr, Taylor, TX de Lunes a Jueves de 9 am a 6 pm.

EMPLEOS

Armadá Towing

ATX VIP Towing

¡Gana el mes!

07/0000 a 08/0000
Tiempo Completo

7508 Bluff Springs Rd • Austin, TX 78744

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Operadores de Vehículos de Servicio de Camión con Licencia de Conducir

NO NECESITAN TENER EXPERIENCIA

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* Vacaciones Pagadas
* Se Provee Equipo y Entrenamiento

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OPORTUNIDAD DE EMPLEO FLEXIBLE

Habla español solamente (No Hay Problema!)

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NO NECESITAN TENER EXPERIENCIA

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* Vacaciones Pagadas
* Se Provee Equipo y Entrenamiento

EMPLEOS

¡ESTAMOS CONTRATANDO!

Segovia Produce, Inc.

una compañía de familia

Busca cargadores y personal para la bodega

Interesados deben pasar examen de drogas y chequeo criminal

OFRECEMOS vacaciones pagadas, programa 401k y seguro.

Para más información llame al (512) 385- 6210

EMPLEOS

Armadá Towing

ATX VIP Towing

¡Gana el mes!

07/0000 a 08/0000
Tiempo Completo

7508 Bluff Springs Rd • Austin, TX 78744

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Operadores de Vehículos de Servicio de Camión con Licencia de Conducir

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ATX VIP Towing

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07/0000 a 08/0000
Tiempo Completo

7508 Bluff Springs Rd • Austin, TX 78744

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* Se Provee Equipo y Entrenamiento

EMPLEOS

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una compañía de familia

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Interesados deben pasar examen de drogas y chequeo criminal

OFRECEMOS vacaciones pagadas, programa 401k y seguro.

Para más información llame al (512) 385- 6210

Paul Worrall

From: Cara Hill
Sent: Wednesday, June 15, 2022 9:26 AM
To: PROOFS
Subject: FW: Public Notice publication requested for TCEQ Air Permitted Facility located in Florence, Williamson County Texas
Attachments: Exflur Affidavit.pdf; Exflur 1x21 _ R040062 1x21 _ Mayo 19.pdf

-----Original Message-----

From: arloe.fontenot@exflur.com <arloe.fontenot@exflur.com>
Sent: Thursday, May 19, 2022 2:40 PM
To: Cara Hill <Cara.Hill@Tceq.Texas.Gov>
Cc: eric.bierschenk@exflur.com; bierschenk_t@exflur.com
Subject: FW: Public Notice publication requested for TCEQ Air Permitted Facility located in Florence, Williamson County Texas

Good afternoon Cara,

See amended PN2 in alternative language paper El Mundo running in today's issue May 19 .
Affidavit also attached.

As always reach out if any questions or concerns.

Thanks,

Arloe Fontenot
EHS Manager
Exflur Research Corp
2350 Double Creek Dr
Round Rock, Texas 78664
C: 225-636-1010
O: 512-310-9044
exflur.com

-----Original Message-----

From: 'Angela Angulo' <angela@elmundonewspaper.com>
Sent: Thursday, May 19, 2022 2:12 PM
To: arloe.fontenot@exflur.com
Subject: RE: Public Notice publication requested for TCEQ Air Permitted Facility located in Florence, Williamson County Texas

Arloe,

Please find attached the notice and affidavit. Original will be in the mail today.

>>
>>
>>

>> -----Original Message-----

>> From: arloe.fontenot@exfluor.com <arloe.fontenot@exfluor.com>

>> Sent: Tuesday, May 17, 2022 8:25 AM

>> To: 'Angela Angulo' <angela@elmundonewspaper.com>

>> Subject: FW: Public Notice publication requested for TCEQ Air

>> Permitted Facility located in Florence, Williamson County Texas

>>
>>
>>

>> -----Original Message-----

>> From: arloe.fontenot@exfluor.com <arloe.fontenot@exfluor.com>

>> Sent: Monday, May 2, 2022 2:21 PM

>> To: 'Betty@elmundo.com' <Betty@elmundo.com>

>> Subject: FW: Public Notice publication requested for TCEQ Air

>> Permitted Facility located in Florence, Williamson County Texas

>>
>>

>> Hola Betty,

>> I just spoke with you about running the public notice again, with some added words.

>> The original proof & amended notice is attached.

>>
>>

>> On pg 2 the additional wording that needs to be translation into the notice are highlighted in yellow.

>> The additional wording is also below:

>>
>>

>> "...and particulate matter including particulate matter with diameters of 10 microns or less and 2.5 microns or less."

>>
>>

>> Thank you!

>>
>>

>> Arloe Fontenot

>> EHS Manager

>> Exfluor Research Corp

>> 2350 Double Creek Dr

>> Round Rock, Texas 78664

>> C: 225-636-1010

>> O: 512-310-9044

>> exfluor.com

>>
>>
>>

>> -----Original Message-----

>> From: 'Angela Angulo' <angela@elmundonewspaper.com>

>> Sent: Thursday, March 10, 2022 11:44 AM

>> To: arloe.fontenot@exfluor.com

>> Cc: eric.bierschenk@exfluor.com

>> Subject: RE: Public Notice publication requested for TCEQ Air

>> Permitted Facility located in Florence, Williamson County Texas

>>

>>>> EHS Manager
>>>> Exfluor Research Corp
>>>> Round Rock, Texas
>>>> C: 225-636-1010
>>>> O: 512-310-9044
>>>> exfluor.com

>>>>
>>>>
>>>>
>>>>

>>>> -----Original Message-----

>>>> From: 'Angela Angulo' <angela@elmundonewspaper.com>
>>>> Sent: Wednesday, March 2, 2022 12:18 PM
>>>> To: arloe.fontenot@exfluor.com
>>>> Cc: eric.bierschenk@exfluor.com
>>>> Subject: RE: Public Notice publication requested for TCEQ Air
>>>> Permitted Facility located in Florence, Williamson County Texas

>>>> Arloe,

>>>>
>>>> We can work with the notice either way. Our translation fee is
>>>> \$75

>>>>
>>>>

>>>>> On March 2, 2022 1:15 PM arloe.fontenot@exfluor.com wrote:

>>>>>
>>>>>

>>>>> Hi Angela,

>>>>> Thank you so much.

>>>>> Do you also translate the notices if I send them in word?

>>>>> Or would you like me to send over everything already translated?

>>>>>

>>>>> Thanks,

>>>>>

>>>>> Arloe Fontenot

>>>>>

>>>>> -----Original Message-----

>>>>> From: Angela Angulo <angela@elmundonewspaper.com>
>>>>> Sent: Wednesday, March 2, 2022 12:00 PM
>>>>> To: arloe.fontenot@exfluor.com
>>>>> Subject: Re: Public Notice publication requested for TCEQ Air
>>>>> Permitted Facility located in Florence, Williamson County
>>>>> Texas

>>>>>

>>>>> Arloe,

>>>>>

>>>>> You can email everything to us. The affidavit and copies of the paper will be mail to you after publication date.

>>>>>

>>>>> Send me the file to verify which one are you running and provide you with the correct quote.

>>>>>

>>>>> Our next publication date is March 10, 2022.

>>>>>

> (512) 47- MUNDO (476-8636)

Angela M. Angulo
Executive Director / Co-Publisher
El Mundo Newspaper
(512) 47- MUNDO (476-8636)

Application Exhibit 27

Chief Clerk Mailing of Public Meeting
Notice, Including Texas Register
Verification of Public Meeting Notice for
May 27, 2022 Publication

TEXAS COMMISSION ON ENVIRONMENTAL QUALITY



EXAMPLE A

NOTICE OF PUBLIC MEETING FOR AN AIR QUALITY PERMIT

PROPOSED PERMIT NUMBER: 165848

APPLICATION. Exflur Research Corporation has applied to the Texas Commission on Environmental Quality (TCEQ) for issuance of Proposed Air Quality Permit Number 165848, which would authorize construction of the Exflur Research facility located at 1100 County Road 236, Florence, Williamson County, Texas 76527. This application was processed in an expedited manner, as allowed by the commission's rules in 30 Texas Administrative Code, Chapter 101, Subchapter J. This application was submitted to the TCEQ on July 9, 2021. The proposed facility will emit the following contaminants: hydrogen fluorides, carbon monoxide, hazardous air pollutants, nitrogen oxides, organic compounds, and particulate matter with diameters of 10 microns or less and 2.5 microns or less.

The executive director has completed the technical review of the application and prepared a draft permit which, if approved, would establish the conditions under which the facility must operate. The executive director has made a preliminary decision to issue the permit because it meets all rules and regulations.

PUBLIC COMMENT/PUBLIC MEETING. You may submit public comments to the Office of the Chief Clerk at the address below. The TCEQ will consider all public comments in developing a final decision on the application. A public meeting will be held and will consist of two parts, an Informal Discussion Period and a Formal Comment Period. A public meeting is not a contested case hearing under the Administrative Procedure Act. During the Informal Discussion Period, the public will be encouraged to ask questions of the applicant and TCEQ staff concerning the permit application. The comments and questions submitted orally during the Informal Discussion Period will not be considered before a decision is reached on the permit application, and no formal response will be made. Responses will be provided orally during the Informal Discussion Period. During the Formal Comment Period on the permit application, members of the public may state their formal comments orally into the official record. At the conclusion of the comment period, all formal comments will be considered before a decision is reached on the permit application. A written response to all formal comments will be prepared by the executive director and will be sent to each person who submits a formal comment or who requested to be on the mailing list for this permit application and provides a mailing address. Only relevant and material issues raised during the Formal Comment Period can be considered if a contested case hearing is granted on this permit application.

The Public Meeting is to be held:

**Thursday, June 16 at 7:00 PM
Florence High School (Cafeteria)
401 FM 970
Florence, Texas 76527**

INFORMATION. Members of the public are encouraged to submit written comments anytime during the public meeting or by mail before the close of the public comment period to the Office of the Chief Clerk, TCEQ, Mail Code MC-105, P.O. Box 13087, Austin, Texas 78711-3087 or electronically at <https://www14.tceq.texas.gov/epic/eComment/>. If you need more information about the permit application or the permitting process, please call the TCEQ Public Education Program, toll free, at 1-800-687-4040. General information can be found at our Web site at www.tceq.texas.gov. *Si desea información en Español, puede llamar al 1-800-687-4040.*

The permit application, executive director's preliminary decision, and draft permit will be available for viewing and copying at the TCEQ central office, the TCEQ Austin regional office, and at the Eula Hunt Beck Florence Public Library, 207 East Main Street, Williamson County, Texas. The facility's compliance file, if any exists, is available for public review at the TCEQ Austin Regional Office, 12100 Park 35 Circle Building A Room 179, Austin, Texas. Further information may also be obtained from Exflur Research Corporation by calling Dr. Thomas Bierschenk, PhD, Vice President at (512) 310-9044 or at Exflur Research Corporation, 2350 Double Creek Drive, Round Rock, Texas 78664.

Persons with disabilities who need special accommodations at the meeting should call the Office of the Chief Clerk at 512-239-3300 or 1-800-RELAY-TX (TDD) at least five business days prior to the meeting.

Notice Issuance Date: May 17, 2022

THE HONORABLE DAWN BUCKINGHAM
TEXAS SENATE
DISTRICT ROOM E1.808
TEXAS STATE CAPITOL
Dawn.buckingham@senate.texas.gov

THE HONORABLE CHARLES SCHWERTNER
TEXAS SENATE
DISTRICT ROOM 3E.10
TEXAS STATE CAPITOL
Charles.schwertner@senate.texas.gov

THE HONORABLE JOHN BUCY
TEXAS HOUSE OF REPRESENTATIVES
DISTRICT ROOM E2.602
TEXAS STATE CAPITOL
john.bucy@house.texas.gov

THE HONORABLE JAMES TALARICO
TEXAS HOUSE OF REPRESENTATIVES
DISTRICT ROOM E2.418
TEXAS STATE CAPITOL
james.talarico@house.texas.gov

THE HONORABLE TERRY WILSON
TEXAS HOUSE OF REPRESENTATIVES
DISTRICT ROOM E2.714
TEXAS STATE CAPITOL
Terry.wilson@house.texas.gov

165848

STATE

5/13/2022
APP-00625

CITY OF FLORENCE
HEALTH OFFICIAL
PO BOX 430
FLORENCE TX 76527-0430

CITY OF FLORENCE
MAYOR
PO BOX 430
FLORENCE TX 76527-0430

CITY

CAPITAL AREA COUNCIL OF GOVERN
6800 BURLESON RD STE 165
AUSTIN TX 78744-2325

CITY OF AUSTIN WATERSHED DEPT.
TPDES PERMIT
PO BOX 1088
AUSTIN TX 78767-1088

PUBLIC HEALTH REGION 7
TEXAS DEPARTMENT OF STATE HEAL
2408 S 37TH ST
TEMPLE TX 76504-7168

US ARMY CORPS OF ENGINEERS REG
CESWS-PER-R
PO BOX 17300
FORT WORTH TX 76102-0300

FIELD SUPERVISOR
US FISH & WILDLIFE SERVICE
10711 BURNET RD STE 200
AUSTIN TX 78758-4460

WILLIAMSON COUNTY & CITIES HEA
355 TEXAS AVE
ROUND ROCK TX 78664-2565

WILLIAMSON COUNTY JUDGE
710 S MAIN ST STE 101
GEORGETOWN TX 78626-5701

JIM BRIGGS
CITY OF GEORGETOWN UTILITY SYS
PO BOX 409
GEORGETOWN TX 78627-0409

MR MICHAEL THANE DIR OF UTI
CITY OF ROUND ROCK
2008 ENTERPRISE DR
ROUND ROCK TX 78664-2120

MR MICHAEL THANE DIR OF UTI
CITY OF ROUND ROCK
2008 ENTERPRISE DR
ROUND ROCK TX 78664

LAURALEE VALLON GENERAL CO
BRAZOS RIVER AUTHORITY
4600 COBBS DR
PO BOX 7555
WACO TX 76714-7555

COUNTY

THE HONORABLE TERRY M WILSON STATE
TEXAS HOUSE OF REPRESENTATIVES
PO BOX 2910
AUSTIN TX 78768-2910

THE HONORABLE CHARLES SCHWERTNER
THE SENATE OF TEXAS DISTRICT 5
PO BOX 12068
AUSTIN TX 78711-2068

COURTNEY ALCOTT
108 SAN MARINO TRL
GEORGETOWN TX 78633-4467

MAUDE MCCORMICK ALLEN
1251 COUNTY ROAD 208
FLORENCE TX 76527-4275

NICOLE ANTHONY
400 EARL KEEN ST
LEANDER TX 78641-4354

FEDERICO I ARCE
10116 ANDRE DR
IRVING TX 75063-5932

RACHEL AUSTIN
CITY OF JONESTOWN
PO BOX 5023
JONESTOWN TX 78645-0002

TAMI BAKER
BLUE LINE REALTY LLC
901 COUNTY ROAD 209
LIBERTY HILL TX 78642-3740

MR MARK BAKER
5420 COUNTY ROAD 236
LIBERTY HILL TX 78642-3743

MRS KRISTYN BARRY
1250 COUNTY ROAD 207
LIBERTY HILL TX 78642-3750

MS REBECCA BARTELS
PO BOX 1051
CEDAR PARK TX 78630-1051

ROBERT LIONEL BASKIND
165 MALLARD LN
LEANDER TX 78641-2709

IP/PROT

165848

5/13/2022
APP-00626

SUZY BATES
16249 W STATE HIGHWAY 29
LIBERTY HILL TX 78642-3803

STEPHEN BAUER
800 HIDDEN BEAR RD
LIBERTY HILL TX 78642-4634

DANIAL BEESLEY
709 OAK CREST LN
GEORGETOWN TX 78628-2622

DR. DON T BERRY
829 CASTLE RIDGE RD
AUSTIN TX 78746-5105

ANNE KATHRINE BEVILLE
443 COUNTY ROAD 278
LIBERTY HILL TX 78642-4378

JAMES BLAKE
604 PURPLE SALVIA CV
LIBERTY HILL TX 78642-2382

LANA BLAKE
604 PURPLE SALVIA CV
LIBERTY HILL TX 78642-2382

NATALIE BLANKENBAKER
701 DUBINA AVE
GEORGETOWN TX 78626-2616

JOY BORJES
216 CAPSTONE RD
LIBERTY HILL TX 78642-3620

BARRY L BOWDEN
PURCELL FARM
708 COUNTY ROAD 208
FLORENCE TX 76527-4751

TWILA BOWDEN
708 COUNTY ROAD 208
FLORENCE TX 76527-4751

GEN RICHARD ARTHUR BOX
2504 SPRING LN
AUSTIN TX 78703-1743

DR. WHITNEY BRACE
611 COWBOY TRL
LIBERTY HILL TX 78642-4019

LINDSEY BRASSFIELD
516 WARLANDER WAY
GEORGETOWN TX 78626-4353

ASHLEY BROOKS
111 CREEKSIDE DR
LIBERTY HILL TX 78642-3936

CHRISTOPHER BUNCH
101 MILESTONE RD
LIBERTY HILL TX 78642-4409

JAIME CADWALADER
105 RETAMA TREE TRCE
LIBERTY HILL TX 78642-2223

ALEX CAMPO
PO BOX 40
WEIR TX 78674-0040

SUSAN G CARLSON
128 N SHOWHORSE DR
LIBERTY HILL TX 78642-3928

MR JOHN J CARLTON
THE CARLTON LAW FIRM PLLC
STE B130
4301 WESTBANK DR
AUSTIN TX 78746-6568

MR ROBERT CARWELL
6600 COUNTY ROAD 200
LIBERTY HILL TX 78642-3725

SHARON H CASSADY
1541 ORCHARD DR
LEANDER TX 78641-1370

MONICA CASTRO
1630 COUNTY ROAD 279
LIBERTY HILL TX 78642-4299

RANDA CHAPMAN
1244 COUNTY ROAD 202
LIBERTY HILL TX 78642-2335

JAMES R CLARNO
108 TRINITY LN
GEORGETOWN TX 78633-4118

CONCERNED CITIZEN
CITY OF AUSTIN - AUSTIN WATER UTILITY
ATTN DIRECTOR
PO BOX 1088
AUSTIN TX 78767-1088

VICCI CONWAY
668 SPEED HORSE
LIBERTY HILL TX 78642-4782

C D COOK
209 CHADWICK DR
GEORGETOWN TX 78628-7207

NOELKE COTTON
LAW DEPARTMENT CITY OF AUSTIN
PO BOX 1088
AUSTIN TX 78767-1088

TIM COX
181 RIO GABRIEL DR
LIBERTY HILL TX 78642-5782

165848

IP/PROT

5/13/2022
APP-00627

BETTY & CHESTER CRITCHFIELD
PECAN SPRINGS RANCH
801 COUNTY ROAD 344
JARRELL TX 76537-1194

MR ERIC CROP
1799 COUNTY ROAD 223
FLORENCE TX 76527-4231

GRANT CROSS
158 BARN OWL LOOP
LEANDER TX 78641-1881

KAREN CROSS
31161 RIVERWOOD RD
MILLSBORO DE 19966-7299

VASANTHA DACHA
13811 BOYLE LN
FRISCO TX 75035-0375

CORWIN E DAVIDSON
100 CLEAR CREEK RD
LIBERTY HILL TX 78642-3719

PAUL DAVIDSON
100 CLEAR CREEK RD
LIBERTY HILL TX 78642-3719

ERIN DEBARBIERI
109 NORTHERN HARRIER CT
LEANDER TX 78641-4524

AMY B DECOSMO
120 RETAMA TREE TRCE
LIBERTY HILL TX 78642-2223

CRISTIN L DERSHEM
141 TAMBRA LEA LN
LIBERTY HILL TX 78642-2359

MENGBING DONG
905 UMBRELLA SKY
LIBERTY HILL TX 78642-2233

JANET ELLIS
223 CARRIAGE OAKS DR
LIBERTY HILL TX 78642-3853

MR GUY ENDSLEY
4600 COUNTY ROAD 207
LIBERTY HILL TX 78642-3799

LAUREN ENDSLEY
4600 COUNTY ROAD 207
LIBERTY HILL TX 78642-3799

MORGAN ENDSLEY
4600 COUNTY ROAD 207
LIBERTY HILL TX 78642-3799

TANYA ENDSLEY
4600 COUNTY ROAD 207
LIBERTY HILL TX 78642-3799

DR. FRANCESCA C ESTRADA
249 COWBOY TRL
LIBERTY HILL TX 78642-3954

TYLER ANDREW EYRE
305 RIDGE VIEW DR
GEORGETOWN TX 78628-6899

JENNIFER EYRE
305 RIDGE VIEW DR
GEORGETOWN TX 78628-6899

MS SHERYL MARIE FARLEY
6600 COUNTY ROAD 200
LIBERTY HILL TX 78642-3725

MRS JEANNIE FICKEL
2775 COUNTY ROAD 207
LIBERTY HILL TX 78642-3778

ANTHONY FIGGINS
101 QUARRY ROCK LOOP
LIBERTY HILL TX 78642-4039

AMANDA FOSTER
132 LOCKHART DR
LIBERTY HILL TX 78642-2318

DAVID O FREDERICK
PERALES ALLMON & ICE PC
1206 SAN ANTONIO ST
AUSTIN TX 78701-1834

ELIZABETH ANN FRIOU
5203 RIDGE OAK DR
AUSTIN TX 78731-4811

KATHERINE FULLER
177 EAGLE OWL LOOP
LEANDER TX 78641-2712

JILLIAN GABRIEL
105 LARK ST
LEANDER TX 78641-1890

ANNA GANDY
211 NORMAL SCHOOL WAY
LIBERTY HILL TX 78642-4892

BRITNI GANZE
205 WESTON DR
LIBERTY HILL TX 78642-5560

BRANDON GARCIA
441 FALCON LN
LEANDER TX 78641-1771

165848

IP / PROT

5/13/2022

APP-00628

KYLE GEHRER
1200 COUNTY ROAD 236
FLORENCE TX 76527-4850

SHANNON GEHRER
1200 COUNTY ROAD 236
FLORENCE TX 76527-4850

MR WILLIAM PATRICK GEORGE
2301 COUNTY ROAD 223
FLORENCE TX 76527-4214

RICHARD GRABISH
201 SHADY OAKS TRL
LIBERTY HILL TX 78642-3944

JUDY GRACI
15775 BOOTH CIR
VOLENTE TX 78641-9684

KATLYN GREEN
221 KING ELDER LN
LEANDER TX 78641-1738

CHARLES GROSS
5731 COUNTY ROAD 236
LIBERTY HILL TX 78642-2300

CHRISTI LACHELLE GUTIERREZ
218 QUARRY ROCK LOOP
LIBERTY HILL TX 78642-4040

HEINRICH HAFNER
6750 COUNTY ROAD 200
LIBERTY HILL TX 78642-3974

DENELLE HAGER
5900 COUNTY ROAD 236
LIBERTY HILL TX 78642

KELLEY HEATH
205 TALON GRASP TRL
LEANDER TX 78641-2595

CHELSEY HEIL
516 TALON GRASP TRL
LEANDER TX 78641-3414

BRENDA HENDRICKSON
137 TORDESILLAS DR
GEORGETOWN TX 78626

JAMES HENLEY
304 TANAGER PASS
LEANDER TX 78641-3841

ED HILLIS
1012 COUNTRY CLUB RD
GEORGETOWN TX 78628-3514

LORAIN HOANE
4920 N INTERSTATE 35
AUSTIN TX 78751-2716

JULIA HOLLIS
1025 LEEDS CASTLE WALK
GEORGETOWN TX 78626-8031

M D HOSSAIN
CITY OF KILLEEN
PUBLIC WORKS/ENGINEERING
200 E AVENUE D
KILLEEN TX 76541-5228

LIZ HOWELLS
1818 BLUFFWOOD PL
ROUND ROCK TX 78665-5610

RIMA HUQ
4913 STRADA DR
ROUND ROCK TX 78665-2265

LAUREN ICE
PERALES ALLMON & ICE PC
1206 SAN ANTONIO ST
AUSTIN TX 78701-1834

MONICA JACOBS
KELLY HART & HALLMAN LLP
STE 2000
303 COLORADO ST
AUSTIN TX 78701-4653

ANDREA JAGODZINSKI
216 CAPITAL HILL VW
LIBERTY HILL TX 78642-2241

SHAWN JAGODZINSKI
216 CAPITAL HILL VW
LIBERTY HILL TX 78642-2241

BINEETA JAISWAL
1906 LAMINAR CREEK RD
CEDAR PARK TX 78613-5843

BRIAN S JALUFKA
1650 COUNTY ROAD 204
LIBERTY HILL TX 78642-3586

SABRINA JANNISE
116 CHICKADEE LN
LEANDER TX 78641-2703

TIFFANY JOHNSON
2500 COUNTY ROAD 207
LIBERTY HILL TX 78642-4044

SUZANNE JOHNSON
JOHNSON WOODS
1400 COUNTY ROAD 236
FLORENCE TX 76527

MATTHEW JOHNSON
900 COUNTY ROAD 202
LIBERTY HILL TX 78642-3767

165848

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MR & MRS GARY JOHNSON
1011 RED CLIFF DR
AUSTIN TX 78758-5133

CATHERINE JOHNSTON
4960 HIGHWAY 138
FLORENCE TX 76527-4901

MRS CHESLEY JONES
100 GOLDEN EAGLE LN
LEANDER TX 78641-2717

NICOLE JONES
145 TAMBRA LEA LN
LIBERTY HILL TX 78642-2359

CORY R JUBY
826 LINGER LN
AUSTIN TX 78721-3650

HEMANTH KHAMBHAMMETTU
401 NORTHCREST DR
LIBERTY HILL TX 78642-2392

KAREN KILDALL
421 RIO GABRIEL CV
LIBERTY HILL TX 78642-5794

TIMOTHY KING
157 CASCATA WAY
LIBERTY HILL TX 78642-2125

DOLORES KING
157 CASCATA WAY
LIBERTY HILL TX 78642-2125

DAVID KUBIN
741 R O RANCH RD
LIBERTY HILL TX 78642-3977

ARUN KUMAR
905 UMBRELLA SKY
LIBERTY HILL TX 78642-2233

LARS KUSLICH
PO BOX 1908
LIBERTY TX 77575-1908

MRS ERICA LADDEN
104 KINGFISHER LN
LEANDER TX 78641-3421

KIMM LANGSTON
113 ESPERANZA PETAL PASS
LIBERTY HILL TX 78642-2221

LAUREN LARSON
101 POST OAK RANCH RD
LIBERTY HILL TX 78642-3559

KATRINA D LEAL
400 KINGFISHER LN
LEANDER TX 78641-1796

GWYNETH LONERGAN
PERALES ALLMON & ICE PC
1206 SAN ANTONIO ST
AUSTIN TX 78701-1834

STEPHANIE LONG
237 CALERA ST
LIBERTY HILL TX 78642-2192

CYNTHIA P LONG
STE 201
350 DISCOVERY BLVD
CEDAR PARK TX 78613-2260

DANI LOPEZ
541 PEACE DR
LIBERTY HILL TX 78642-2258

JAN LOVE
101 BETHEL ST
GEORGETOWN TX 78633-4635

BABU MADALA
1501 COUNTY ROAD 223
FLORENCE TX 76527-4259

NELSON MAK
812 GABRIEL MILLS DR
ROUND ROCK TX 78664-7911

ALYCEN MALONE
158 BARN OWL LOOP
LEANDER TX 78641-1881

MRS NICHOLE MANTHEY
140 FLOYDS RUN
BERTRAM TX 78605-4807

BRYAN MARTIN
2112 BEAR CREEK DR
LEANDER TX 78641-4471

MRS SHERRI MARTIN
1450 COUNTY ROAD 208
FLORENCE TX 76527-4276

CHUCK & DALE L MARTIN
APT 152
10600 JOLLYVILLE RD
AUSTIN TX 78759-6276

CHUCK & DALE L MARTIN
187 ESTRELLA XING
GEORGETOWN TX 78628-6973

KEN MARTIN PE
MARTIN PRATER & ASSOCIATES
2109 CRAIG PATRICK WAY
AUSTIN TX 78748-3537

165848

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APP-00630

LINDA MARTINEZ
1044 RIVER RNCH
LIBERTY HILL TX 78642-4890

MARY MASSEY
270 COLE DR
LIBERTY HILL TX 78642-4511

MRS STACY MATTISON
151 FALON LN
LIBERTY HILL TX 78642-4321

EMMA MAY
112 LOCKLIN DR
LIBERTY HILL TX 78642-2137

MR BRYCE P MCCORMICK
NORTH SAN GABRIEL ALLIANCE
1250 COUNTY ROAD 208
FLORENCE TX 76527-4628

TIMOTHY MCDANIEL
1800 COUNTY ROAD 208
FLORENCE TX 76527-4235

T J MCDONALD
900 COUNTY ROAD 236
FLORENCE TX 76527-4835

LYLE A MCELDERRY
406 WYNDHAM HILL PKWY
TEMPLE TX 76502-1974

KELLEY MCGHIE
304 REMUDA
LIBERTY HILL TX 78642-4550

RONAL DALTON M CLOUD
4810 COUNTY ROAD 207
LIBERTY HILL TX 78642-4023

SUSAN MECKEL
LOWER COLORADO RIVER AUTHORITY
L106
PO BOX 220
AUSTIN TX 78767-0220

ANDRES MENDEZ
330 MISTY WOOD
BERTRAM TX 78605-4486

MRS NOOR AGHA MENDEZ
330 MISTY WOOD
BERTRAM TX 78605-4486

JANNAH MERSIOVSKY
109 TAMBRA LEA LN
LIBERTY HILL TX 78642-2359

ALLISON METCALFE
1200 ASH DR
MARBLE FALLS TX 78654-7231

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KEMP SMITH LLP
STE 205
2905 SAN GABRIEL ST
AUSTIN TX 78705-3500

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208 N HAVEN DR
LIBERTY HILL TX 78642-2387

KENNETH MOHR
PO BOX 1686
CEDAR PARK TX 78630-1686

MONICA MONK
750 ABBEY RD
LIBERTY HILL TX 78642-3996

JAMES MONK
750 ABBEY RD
LIBERTY HILL TX 78642-3996

CONNIE MOORE
112 HOOT OWL LN N
LEANDER TX 78641-1727

HENRY N MULVIHILL JR
PO BOX 831945
RICHARDSON TX 75083-1945

PATRICIA MULVIHILL
NORTH SAN GABRIEL ALLIANCE
8 LUNDYS LN
RICHARDSON TX 75080-2343

SHEILA NARDELLI
530 ABBEY RD
LIBERTY HILL TX 78642-3994

ROSANA NAREZ
PO BOX 93331
SOUTHLAKE TX 76092-0113

ROSANA NAREZ
TEX-MEX NEWS
PO BOX 8665
WACO TX 76714-8665

CASEY NASH
7603 ISLANDER DR
AUSTIN TX 78749-3028

CINDY NASH
205 ENCORE DR
LIBERTY HILL TX 78642-2147

JAKE NORMAN
1500 COUNTY ROAD 225
FLORENCE TX 76527-3852

NICK NOVO
116 SHADY OAKS TRL
LIBERTY HILL TX 78642-3945

165248

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APP-00631

SARAH NOVO
116 SHADY OAKS TRL
LIBERTY HILL TX 78642-3945

MARK NUNEZ
CITY OF HUTTO
356 COUNTY ROAD 199
HUTTO TX 78634-4271

ABBY OGLETREE
425 CANADIAN SPRINGS DR
LEANDER TX 78641-3528

MRS BRITTNEY ORTIZ
120 COUNTY ROAD 279
LIBERTY HILL TX 78642-4245

MR JOE OWEN
OWEN HOLDINGS
4718 MILL CREEK RD
DALLAS TX 75244-6916

MRS REBECCA R OWENS
20307 MCSHEPHERD RD
GEORGETOWN TX 78626-9320

MRS HEATHER PACHECO
201 COWBOY TRL
LIBERTY HILL TX 78642-3954

LAURIE F PAIR
PO BOX 5908
AUSTIN TX 78763-5908

JEROME PALMER
333 HIDDEN OAKS LN
LIBERTY HILL TX 78642-3726

MR CARVEY LEE PARKJER
105 ROSA DR
LIBERTY HILL TX 78642-2190

TANARA PATEL
128 RAVELLO ST
LIBERTY HILL TX 78642-2306

EMILY PATTERSON
140 PARRY CV
LEANDER TX 78641-4720

BONNIE PEARSON
5545 COUNTY ROAD 200
LIBERTY HILL TX 78642-3721

RON PEARSON
5545 COUNTY ROAD 200
LIBERTY HILL TX 78642-3721

RENEE PEYTON
132 KRUPP AVE
LIBERTY HILL TX 78642-4476

CHRIS PEYTON
132 KRUPP AVE
LIBERTY HILL TX 78642-4476

CARLA PICINICH
2101 COUNTY ROAD 226
FLORENCE TX 76527-4868

MRS CORRINA POINTER
162 ELISHA DR
LIBERTY HILL TX 78642-2257

PATTI PORTER
411 BLESSING RANCH RD
LIBERTY HILL TX 78642-4588

BRYAN PRIMROSE
3901 COUNTY ROAD 258
LIBERTY HILL TX 78642-2106

GINA RAHBARI
232 HOOT OWL LN N
LEANDER TX 78641-1733

TRAVIS REDDING
595 GATLIN RANCH RD
LIBERTY HILL TX 78642-3312

BESSIE RHODES
14814 KINGSFORD WILLOW LN
CYPRESS TX 77429-7918

JAMES RICHARDSON
131 SADDLE LN
LIBERTY HILL TX 78642-4065

LARRY A RIDOLFI
FTL DRIVES INC
1051 COUNTY ROAD 204
LIBERTY HILL TX 78642-3792

DAVID RIVERA
105 LARK ST
LEANDER TX 78641-1890

ERIKA RIX
251 COUNTY ROAD 203
LIBERTY HILL TX 78642-3714

RANDAL ROBBINS
249 COWBOY TRL
LIBERTY HILL TX 78642-3954

WHITNEY ROBBINS
441 SIERRA MAR LOOP
LEANDER TX 78641-3544

CHRIS ROBION
104 REINDEER WAY
GEORGETOWN TX 78626-2547

165848

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APP-00632

MARK ROCKE
6433 COUNTY ROAD 200
LIBERTY HILL TX 78642-4026

MARIA YOLANDA ROCKE
6433 COUNTY ROAD 200
LIBERTY HILL TX 78642-4026

KATY ROSS
614 SAN GABRIEL RANCH RD
LIBERTY HILL TX 78642-4555

MARGARET RUSSELL
RR 1 BOX 35
TEXHOMA OK 73949-9719

CHARLES RUSSELL
RR 1 BOX 93
TEXHOMA OK 73949-9634

SUSAN RUSSELL
RR 1 BOX 93
TEXHOMA OK 73949-9634

LEM RUSSELL
PO BOX 1294
STRATFORD TX 79084-1294

CARI SALAZAR
301 DANIEL XING
LIBERTY HILL TX 78642-4499

KENNETH & RITA SCHOEN
1437 SLAWSON LN
KILLEEN TX 76542-4271

BRIAN SCOTT
300 ABBEY RD
LIBERTY HILL TX 78642-3953

BILL SHIER
8429 BANGOR BND
AUSTIN TX 78758-7901

ELLEN SKOVIERA
1110 OAKLANDS DR
ROUND ROCK TX 78681-2702

NINA SMART
212 KINGFISHER LN
LEANDER TX 78641-2691

STEVEN SMELTZER
ALAMO AREA COUNCIL OF GOVERNMENTS
STE 160
8700 TESORO DR
SAN ANTONIO TX 78217-6208

STEVEN SMELTZER
ALAMO AREA COUNCIL OF GOVERNMENTS
STE 110
2700 NE LOOP 410
SAN ANTONIO TX 78217-4840

WANDA SMITH
900 COUNTY ROAD 236
FLORENCE TX 76527-4835

ROBERT SMITH
923 CASHEW LN
CEDAR PARK TX 78613-3241

MR S SORENSON
BRUSH BEND PROPERTY OWNERS ASSOC
901 BRUSHY BEND DR
ROUND ROCK TX 78681-1401

MICHELE STANFIELD
100 BUTTERCUP TRL
GEORGETOWN TX 78633-4746

HEATHER STONEHILL-GARCIA
441 FALCON LN
LEANDER TX 78641-1771

TIFFANY STOUT
405 LAKE SIDE DR
GEORGETOWN TX 78628-6902

MR THOMAS L SWINT
2809 FRESH SPRING RD
PFLUGERVILLE TX 78660-2381

CALVIN TAIT
103 RIO ANCHO BLVD
LIBERTY HILL TX 78642-3570

JEN TAYLOR
193 HOUSEFINCH LOOP
LEANDER TX 78641-1961

MICHAEL D THANE
3400 SUNRISE RD
ROUND ROCK TX 78665-2398

TIM THRASH
865 COUNTY ROAD 208
FLORENCE TX 76527-4865

ALLISON THRASH
15100 FM 2769
VOLENTE TX 78641-9139

SANDRA LEE THURMAN
190 COUNTY ROAD 208
FLORENCE TX 76527-4472

MASON TINSLEY
11 N BENTON WOODS CIR
THE WOODLANDS TX 77382-1513

SUZE TREACY
2710 GLENWOOD TRL
CEDAR PARK TX 78613-5128

165848

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5/13/2022

APP-00633

TERESA TUCKER
5050 COUNTY ROAD 236
LIBERTY HILL TX 78642-3730

PAUL KEITH TURNER
377 SUNDANCE TRL
LIBERTY HILL TX 78642-3851

TRACEY VAANDRAGER
701 BRIZENDINE RD
LIBERTY HILL TX 78642-3991

BRITTANY D VARNER
PO BOX 1532
LIBERTY HILL TX 78642-1532

LAURA S WALLACE
3204 AZTEC FALL CV
AUSTIN TX 78746-1573

FRANKIE WALLER
80 COUNTY ROAD 208
FLORENCE TX 76527-4484

HAROLD C WARDLAW
19910 PARK RNCH
SAN ANTONIO TX 78259-1934

SUSAN M WARHOL
1260 COUNTY ROAD 208
FLORENCE TX 76527-4628

JASON WATKINS
308 BLESSING RANCH RD
LIBERTY HILL TX 78642-4505

NIKKI WATKINS
51 COUNTY ROAD 153
GEORGETOWN TX 78626-1926

NANCY WEBBER
4128 LAWLESS ST
AUSTIN TX 78723-5393

SCOTT WEISSE
212 RIETI PKWY
LIBERTY HILL TX 78642-2309

CHARLES WEMPE
6589 COUNTY ROAD 200
LIBERTY HILL TX 78642-3983

GREGORY J WHITE IND PRETREAT
CEDAR PARK PUBLIC WORKS DEPT
2315 BRUSHY CREEK LOOP
CEDAR PARK TX 78613-3162

SHANNON WHITE-SHUBERT
3404 CORTINA LN
ROUND ROCK TX 78681-2417

KIMBERLY WHITNEY
475 COUNTY ROAD 218
FLORENCE TX 76527-4634

SKYLER WHITTLESEY
220 ARREZO LN
GEORGETOWN TX 78628-7071

MR KEITH WILCOX
PO BOX 640
FLORENCE TX 76527-0640

HAZIEL WILLIAMS
19926 PARK HOLW
SAN ANTONIO TX 78259-1924

CHARLES R WILLIAMS
19926 PARK HOLW
SAN ANTONIO TX 78259-1924

ASHLEY WILLIAMS
APT 136
1616 W DALLAS ST
HOUSTON TX 77019-4770

SAMANTHA WOOLF
305 LA DERA DR
LIBERTY HILL TX 78642-2122

MR ROBERT WOOLF
305 LA DERA DR
LIBERTY HILL TX 78642-2122

165848

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5/13/2022
APP-00634

From: TexReq@sos.texas.gov
To: [Mehgan Taack](#)
Subject: TEXAS REGISTER ACKNOWLEDGMENT OF RECEIPT
Date: Tuesday, May 17, 2022 11:13:46 AM

ACKNOWLEDGMENT OF RECEIPT

Please note that this email acknowledges receipt of your filing only.
If we find that the document or submission form does not conform to statutory filing requirements or our administrative rules, we may refuse to accept it for filing and publication.
If we refuse your filing, we will notify you.

TRD Number: 202201889
For Issue of: 05/27/2022

Submission Date: 2022-05-17 11:10 AM
Receipt Date: 2022-05-17 11:13 AM

Miscellaneous Document Submission

Agency Name: Texas Commission on Environmental Quality
Agency Code: 0152
Liaison: Mehgan Taack
Title of Document: Notice of Public Meeting
for an Air Quality Permit

Proposed Permit Number: 165848

File Name: 1PM051822.docx

Application Exhibit 28

Chief Clerk Mailing of Amended Public Meeting Notice, Including Texas Register Verification of Public Meeting Notice for June 3, 2022 Publication

TEXAS COMMISSION ON ENVIRONMENTAL QUALITY



EXAMPLE A

AMENDED NOTICE OF PUBLIC MEETING FOR AN AIR QUALITY PERMIT (Amended to clarify the date of the meeting)

PROPOSED PERMIT NUMBER: 165848

APPLICATION. Exflur Research Corporation has applied to the Texas Commission on Environmental Quality (TCEQ) for issuance of Proposed Air Quality Permit Number 165848, which would authorize construction of the Exflur Research facility located at 1100 County Road 236, Florence, Williamson County, Texas 76527. This application was processed in an expedited manner, as allowed by the commission's rules in 30 Texas Administrative Code, Chapter 101, Subchapter J. This application was submitted to the TCEQ on July 9, 2021. The proposed facility will emit the following contaminants: hydrogen fluorides, carbon monoxide, hazardous air pollutants, nitrogen oxides, organic compounds, and particulate matter with diameters of 10 microns or less and 2.5 microns or less.

The executive director has completed the technical review of the application and prepared a draft permit which, if approved, would establish the conditions under which the facility must operate. The executive director has made a preliminary decision to issue the permit because it meets all rules and regulations.

PUBLIC COMMENT/PUBLIC MEETING. You may submit public comments to the Office of the Chief Clerk at the address below. The TCEQ will consider all public comments in developing a final decision on the application. A public meeting will be held and will consist of two parts, an Informal Discussion Period and a Formal Comment Period. A public meeting is not a contested case hearing under the Administrative Procedure Act. During the Informal Discussion Period, the public will be encouraged to ask questions of the applicant and TCEQ staff concerning the permit application. The comments and questions submitted orally during the Informal Discussion Period will not be considered before a decision is reached on the permit application, and no formal response will be made. Responses will be provided orally during the Informal Discussion Period. During the Formal Comment Period on the permit application, members of the public may state their formal comments orally into the official record. At the conclusion of the comment period, all formal comments will be considered before a decision is reached on the permit application. A written response to all formal comments will be prepared by the executive director and will be sent to each person who submits a formal comment or who requested to be on the mailing list for this permit application and provides a mailing address. Only relevant and material issues raised during the Formal Comment Period can be considered if a contested case hearing is granted on this permit application.

The Public Meeting is to be held:

**Thursday, June 16, 2022 at 7:00 PM
Florence High School (Cafeteria)
401 FM 970
Florence, Texas 76527**

INFORMATION. Members of the public are encouraged to submit written comments anytime during the public meeting or by mail before the close of the public comment period to the Office of the Chief Clerk, TCEQ, Mail Code MC-105, P.O. Box 13087, Austin, Texas 78711-3087 or electronically at <https://www14.tceq.texas.gov/epic/eComment/>. If you need more information about the permit application or the permitting process, please call the TCEQ Public Education Program, toll free, at 1-800-687-4040. General information can be found at our Web site at www.tceq.texas.gov. *Si desea información en Español, puede llamar al 1-800-687-4040.*

The permit application, executive director's preliminary decision, and draft permit will be available for viewing and copying at the TCEQ central office, the TCEQ Austin regional office, and at the Eula Hunt Beck Florence Public Library, 207 East Main Street, Williamson County, Texas. The facility's compliance file, if any exists, is available for public review at the TCEQ Austin Regional Office, 12100 Park 35 Circle Building A Room 179, Austin, Texas. Further information may also be obtained from Exflur Research Corporation by calling Dr. Thomas Bierschenk, PhD, Vice President at (512) 310-9044 or at Exflur Research Corporation, 2350 Double Creek Drive, Round Rock, Texas 78664.

Persons with disabilities who need special accommodations at the meeting should call the Office of the Chief Clerk at 512-239-3300 or 1-800-RELAY-TX (TDD) at least five business days prior to the meeting.

Notice Issuance Date: May 23, 2022

THE HONORABLE DAWN BUCKINGHAM
TEXAS SENATE
DISTRICT ROOM E1.808
TEXAS STATE CAPITOL
Dawn.buckingham@senate.texas.gov

THE HONORABLE CHARLES
SCHWERTNER
TEXAS SENATE
DISTRICT ROOM 3E.10
TEXAS STATE CAPITOL
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THE HONORABLE JOHN BUCY
TEXAS HOUSE OF REPRESENTATIVES
DISTRICT ROOM E2.602
TEXAS STATE CAPITOL
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THE HONORABLE JAMES TALARICO
TEXAS HOUSE OF REPRESENTATIVES
DISTRICT ROOM E2.418
TEXAS STATE CAPITOL
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THE HONORABLE TERRY WILSON
TEXAS HOUSE OF REPRESENTATIVES
DISTRICT ROOM E2.714
TEXAS STATE CAPITOL
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165848

STATE

5/23/2022

APP-00639

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HEALTH OFFICIAL
PO BOX 430
FLORENCE TX 76527-0430

CITY OF FLORENCE
MAYOR
PO BOX 430
FLORENCE TX 76527-0430

CITY

CAPITAL AREA COUNCIL OF GOVERN
6800 BURLESON RD STE 165
AUSTIN TX 78744-2325

CITY OF AUSTIN WATERSHED DEPT.
TPDES PERMIT
PO BOX 1088
AUSTIN TX 78767-1088

PUBLIC HEALTH REGION 7
TEXAS DEPARTMENT OF STATE HEAL
2408 S 37TH ST
TEMPLE TX 76504-7168

US ARMY CORPS OF ENGINEERS REG
CESWS-PER-R
PO BOX 17300
FORT WORTH TX 76102-0300

FIELD SUPERVISOR
US FISH & WILDLIFE SERVICE
10711 BURNET RD STE 200
AUSTIN TX 78758-4460

WILLIAMSON COUNTY & CITIES HEA
355 TEXAS AVE
ROUND ROCK TX 78664-2565

WILLIAMSON COUNTY JUDGE
710 S MAIN ST STE 101
GEORGETOWN TX 78626-5701

JIM BRIGGS
CITY OF GEORGETOWN UTILITY SYS
PO BOX 409
GEORGETOWN TX 78627-0409

MR MICHAEL THANE DIR OF UTI
CITY OF ROUND ROCK
2008 ENTERPRISE DR
ROUND ROCK TX 78664-2120

MR MICHAEL THANE DIR OF UTI
CITY OF ROUND ROCK
2008 ENTERPRISE DR
ROUND ROCK TX 78664

LAURALEE VALLON GENERAL CO
BRAZOS RIVER AUTHORITY
4600 COBBS DR
PO BOX 7555
WACO TX 76714-7555

COUNTY

THE HONORABLE TERRY M WILSON STATE
TEXAS HOUSE OF REPRESENTATIVES DIS
PO BOX 2910
AUSTIN TX 78768-2910

THE HONORABLE CHARLES SCHWERTNEF
THE SENATE OF TEXAS DISTRICT 5
PO BOX 12068
AUSTIN TX 78711-2068

COURTNEY ALCOTT
108 SAN MARINO TRL
GEORGETOWN TX 78633-4467

MAUDE MCCORMICK ALLEN
1251 COUNTY ROAD 208
FLORENCE TX 76527-4275

NICOLE ANTHONY
400 EARL KEEN ST
LEANDER TX 78641-4354

FEDERICO I ARCE
10116 ANDRE DR
IRVING TX 75063-5932

RACHEL AUSTIN
CITY OF JONESTOWN
PO BOX 5023
JONESTOWN TX 78645-0002

TAMI BAKER
BLUE LINE REALTY LLC
901 COUNTY ROAD 209
LIBERTY HILL TX 78642-3740

MR MARK BAKER
5420 COUNTY ROAD 236
LIBERTY HILL TX 78642-3743

MRS KRISTYN BARRY
1250 COUNTY ROAD 207
LIBERTY HILL TX 78642-3750

MS REBECCA BARTELS
PO BOX 1051
CEDAR PARK TX 78630-1051

ROBERT LIONEL BASKIND
165 MALLARD LN
LEANDER TX 78641-2709

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165848

5/23/2022
APP-00640

SUZY BATES
16249 W STATE HIGHWAY 29
LIBERTY HILL TX 78642-3803

STEPHEN BAUER
800 HIDDEN BEAR RD
LIBERTY HILL TX 78642-4634

DANIAL BEESLEY
709 OAK CREST LN
GEORGETOWN TX 78628-2622

DR. DON T BERRY
829 CASTLE RIDGE RD
AUSTIN TX 78746-5105

ANNE KATHRINE BEVILLE
443 COUNTY ROAD 278
LIBERTY HILL TX 78642-4378

JAMES BLAKE
604 PURPLE SALVIA CV
LIBERTY HILL TX 78642-2382

LANA BLAKE
604 PURPLE SALVIA CV
LIBERTY HILL TX 78642-2382

NATALIE BLANKENBAKER
701 DUBINA AVE
GEORGETOWN TX 78626-2616

JOY BORJES
216 CAPSTONE RD
LIBERTY HILL TX 78642-3620

BARRY L BOWDEN
PURCELL FARM
708 COUNTY ROAD 208
FLORENCE TX 76527-4751

TWILA BOWDEN
708 COUNTY ROAD 208
FLORENCE TX 76527-4751

GEN RICHARD ARTHUR BOX
2504 SPRING LN
AUSTIN TX 78703-1743

DR. WHITNEY BRACE
611 COWBOY TRL
LIBERTY HILL TX 78642-4019

CONOR BRACE
611 COWBOY TRL
LIBERTY HILL TX 78642-4019

LINDSEY BRASSFIELD
516 WARLANDER WAY
GEORGETOWN TX 78626-4353

ASHLEY BROOKS
111 CREEKSIDE DR
LIBERTY HILL TX 78642-3936

CHRISTOPHER BUNCH
101 MILESTONE RD
LIBERTY HILL TX 78642-4409

JAIME CADWALADER
105 RETAMA TREE TRCE
LIBERTY HILL TX 78642-2223

ALEX CAMPO
PO BOX 40
WEIR TX 78674-0040

SUSAN G CARLSON
128 N SHOWHORSE DR
LIBERTY HILL TX 78642-3928

MR JOHN J CARLTON
THE CARLTON LAW FIRM PLLC
STE B130
4301 WESTBANK DR
AUSTIN TX 78746-6568

MR ROBERT CARWELL
6600 COUNTY ROAD 200
LIBERTY HILL TX 78642-3725

SHARON H CASSADY
1541 ORCHARD DR
LEANDER TX 78641-1370

MONICA CASTRO
1630 COUNTY ROAD 279
LIBERTY HILL TX 78642-4299

RANDA CHAPMAN
1244 COUNTY ROAD 202
LIBERTY HILL TX 78642-2335

JAMES R CLARNO
108 TRINITY LN
GEORGETOWN TX 78633-4118

CONCERNED CITIZEN
CITY OF AUSTIN - AUSTIN WATER UTILITY
ATTN DIRECTOR
PO BOX 1088
AUSTIN TX 78767-1088

VICCI CONWAY
668 SPEED HORSE
LIBERTY HILL TX 78642-4782

C D COOK
209 CHADWICK DR
GEORGETOWN TX 78628-7207

NOELKE COTTON
LAW DEPARTMENT CITY OF AUSTIN
PO BOX 1088
AUSTIN TX 78767-1088

165848

IP/PROT

5/23/2022

APP-00641

TIM COX
181 RIO GABRIEL DR
LIBERTY HILL TX 78642-5782

BETTY & CHESTER CRITCHFIELD
PECAN SPRINGS RANCH
801 COUNTY ROAD 344
JARRELL TX 76537-1194

MR ERIC CROP
1799 COUNTY ROAD 223
FLORENCE TX 76527-4231

GRANT CROSS
158 BARN OWL LOOP
LEANDER TX 78641-1881

KAREN CROSS
31161 RIVERWOOD RD
MILLSBORO DE 19966-7299

VASANTHA DACHA
13811 BOYLE LN
FRISCO TX 75035-0375

CORWIN E DAVIDSON
100 CLEAR CREEK RD
LIBERTY HILL TX 78642-3719

PAUL DAVIDSON
100 CLEAR CREEK RD
LIBERTY HILL TX 78642-3719

ERIN DEBARBIERI
109 NORTHERN HARRIER CT
LEANDER TX 78641-4524

AMY B DECOSMO
120 RETAMA TREE TRCE
LIBERTY HILL TX 78642-2223

CRISTIN L DERSHEM
141 TAMBRA LEA LN
LIBERTY HILL TX 78642-2359

MENGBING DONG
905 UMBRELLA SKY
LIBERTY HILL TX 78642-2233

JANET ELLIS
223 CARRIAGE OAKS DR
LIBERTY HILL TX 78642-3853

MR GUY ENDSLEY
4600 COUNTY ROAD 207
LIBERTY HILL TX 78642-3799

LAUREN ENDSLEY
4600 COUNTY ROAD 207
LIBERTY HILL TX 78642-3799

MORGAN ENDSLEY
4600 COUNTY ROAD 207
LIBERTY HILL TX 78642-3799

TANYA ENDSLEY
4600 COUNTY ROAD 207
LIBERTY HILL TX 78642-3799

DR. FRANCESCA C ESTRADA
249 COWBOY TRL
LIBERTY HILL TX 78642-3954

TYLER ANDREW EYRE
305 RIDGE VIEW DR
GEORGETOWN TX 78628-6899

JENNIFER EYRE
305 RIDGE VIEW DR
GEORGETOWN TX 78628-6899

MS SHERYL MARIE FARLEY
6600 COUNTY ROAD 200
LIBERTY HILL TX 78642-3725

MRS JEANNIE FICKEL
2775 COUNTY ROAD 207
LIBERTY HILL TX 78642-3778

ANTHONY FIGGINS
101 QUARRY ROCK LOOP
LIBERTY HILL TX 78642-4039

AMANDA FOSTER
132 LOCKHART DR
LIBERTY HILL TX 78642-2318

DAVID O FREDERICK
PERALES ALLMON & ICE PC
1206 SAN ANTONIO ST
AUSTIN TX 78701-1834

ELIZABETH ANN FRIOU
5203 RIDGE OAK DR
AUSTIN TX 78731-4811

KATHERINE FULLER
177 EAGLE OWL LOOP
LEANDER TX 78641-2712

JILLIAN GABRIEL
105 LARK ST
LEANDER TX 78641-1890

ANNA GANDY
211 NORMAL SCHOOL WAY
LIBERTY HILL TX 78642-4892

BRITNI GANZE
205 WESTON DR
LIBERTY HILL TX 78642-5560

165848

IP/PROT

5/23/2022
APP-00642

BRANDON GARCIA
441 FALCON LN
LEANDER TX 78641-1771

KYLE GEHRER
1200 COUNTY ROAD 236
FLORENCE TX 76527-4850

SHANNON GEHRER
1200 COUNTY ROAD 236
FLORENCE TX 76527-4850

MR WILLIAM PATRICK GEORGE
2301 COUNTY ROAD 223
FLORENCE TX 76527-4214

RICHARD GRABISH
201 SHADY OAKS TRL
LIBERTY HILL TX 78642-3944

JUDY GRACI
15775 BOOTH CIR
VOLENTE TX 78641-9684

KATLYN GREEN
221 KING ELDER LN
LEANDER TX 78641-1738

CHARLES GROSS
5731 COUNTY ROAD 236
LIBERTY HILL TX 78642-2300

CHRISTI LACHELLE GUTIERREZ
218 QUARRY ROCK LOOP
LIBERTY HILL TX 78642-4040

HEINRICH HAFNER
6750 COUNTY ROAD 200
LIBERTY HILL TX 78642-3974

DENELLE HAGER
5900 COUNTY ROAD 236
LIBERTY HILL TX 78642

JOANNA R HAYES
424 DRYSTONE TRL
LIBERTY HILL TX 78642-4373

KELLEY HEATH
205 TALON GRASP TRL
LEANDER TX 78641-2595

CHELSEY HEIL
516 TALON GRASP TRL
LEANDER TX 78641-3414

BRENDA HENDRICKSON
137 TORDESILLAS DR
GEORGETOWN TX 78626

JAMES HENLEY
304 Tanager PASS
LEANDER TX 78641-3841

ED HILLIS
1012 COUNTRY CLUB RD
GEORGETOWN TX 78628-3514

LORAIN HOANE
4920 N INTERSTATE 35
AUSTIN TX 78751-2716

JULIA HOLLIS
1025 LEEDS CASTLE WALK
GEORGETOWN TX 78626-8031

M D HOSSAIN
CITY OF KILLEEN
PUBLIC WORKS/ENGINEERING
200 E AVENUE D
KILLEEN TX 76541-5228

LIZ HOWELLS
1818 BLUFFWOOD PL
ROUND ROCK TX 78665-5610

RIMA HUQ
4913 STRADA DR
ROUND ROCK TX 78665-2265

LAUREN ICE
PERALES ALLMON & ICE PC
1206 SAN ANTONIO ST
AUSTIN TX 78701-1834

MONICA JACOBS
KELLY HART & HALLMAN LLP
STE 2000
303 COLORADO ST
AUSTIN TX 78701-4653

ANDREA JAGODZINSKI
216 CAPITAL HILL VW
LIBERTY HILL TX 78642-2241

SHAWN JAGODZINSKI
216 CAPITAL HILL VW
LIBERTY HILL TX 78642-2241

BINEETA JAISWAL
1906 LAMINAR CREEK RD
CEDAR PARK TX 78613-5843

BRIAN S JALUFKA
1650 COUNTY ROAD 204
LIBERTY HILL TX 78642-3586

SABRINA JANNISE
116 CHICKADEE LN
LEANDER TX 78641-2703

TIFFANY JOHNSON
2500 COUNTY ROAD 207
LIBERTY HILL TX 78642-4044

165848

IP/PROT

5/23/2022
APP-00643

SUZANNE JOHNSON
JOHNSON WOODS
1400 COUNTY ROAD 236
FLORENCE TX 76527-4918

MATTHEW JOHNSON
900 COUNTY ROAD 202
LIBERTY HILL TX 78642-3767

MR & MRS GARY JOHNSON
1011 RED CLIFF DR
AUSTIN TX 78758-5133

CATHERINE JOHNSTON
4960 HIGHWAY 138
FLORENCE TX 76527-4901

MRS CHESLEY JONES
100 GOLDEN EAGLE LN
LEANDER TX 78641-2717

NICOLE JONES
145 TAMBRA LEA LN
LIBERTY HILL TX 78642-2359

CORY R JUBY
826 LINGER LN
AUSTIN TX 78721-3650

HEMANTH KHAMHAMMETTU
401 NORTHCREST DR
LIBERTY HILL TX 78642-2392

KAREN KILDALL
421 RIO GABRIEL CV
LIBERTY HILL TX 78642-5794

TIMOTHY KING
157 CASCATA WAY
LIBERTY HILL TX 78642-2125

DOLORES KING
157 CASCATA WAY
LIBERTY HILL TX 78642-2125

DAVID KUBIN
741 R O RANCH RD
LIBERTY HILL TX 78642-3977

ARUN KUMAR
905 UMBRELLA SKY
LIBERTY HILL TX 78642-2233

LARS KUSLICH
PO BOX 1908
LIBERTY TX 77575-1908

MRS ERICA LADDEN
104 KINGFISHER LN
LEANDER TX 78641-3421

KIMM LANGSTON
113 ESPERANZA PETAL PASS
LIBERTY HILL TX 78642-2221

LAUREN LARSON
101 POST OAK RANCH RD
LIBERTY HILL TX 78642-3559

KATRINA D LEAL
400 KINGFISHER LN
LEANDER TX 78641-1796

GWYNETH LONERGAN
PERALES ALLMON & ICE PC
1206 SAN ANTONIO ST
AUSTIN TX 78701-1834

STEPHANIE LONG
237 CALERA ST
LIBERTY HILL TX 78642-2192

CYNTHIA P LONG
STE 201
350 DISCOVERY BLVD
CEDAR PARK TX 78613-2260

DANI LOPEZ
541 PEACE DR
LIBERTY HILL TX 78642-2258

JAN LOVE
101 BETHEL ST
GEORGETOWN TX 78633-4635

BABU MADALA
1501 COUNTY ROAD 223
FLORENCE TX 76527-4259

NELSON MAK
812 GABRIEL MILLS DR
ROUND ROCK TX 78664-7911

ALYCEN MALONE
158 BARN OWL LOOP
LEANDER TX 78641-1881

MRS NICHOLE MANTHEY
140 FLOYDS RUN
BERTRAM TX 78605-4807

BRYAN MARTIN
2112 BEAR CREEK DR
LEANDER TX 78641-4471

MRS SHERRI MARTIN
1450 COUNTY ROAD 208
FLORENCE TX 76527-4276

CHUCK & DALE L MARTIN
APT 152
10600 JOLLYVILLE RD
AUSTIN TX 78759-6276

165848

IP/PROT

5/23/2022
APP-00644

CHUCK & DALE L MARTIN
187 ESTRELLA XING
GEORGETOWN TX 78628-6973

KEN MARTIN PE
MARTIN PRATER & ASSOCIATES
2109 CRAIG PATRICK WAY
AUSTIN TX 78748-3537

LINDA MARTINEZ
1044 RIVER RNCH
LIBERTY HILL TX 78642-4890

MARY MASSEY
270 COLE DR
LIBERTY HILL TX 78642-4511

MRS STACY MATTISON
151 FALON LN
LIBERTY HILL TX 78642-4321

EMMA MAY
112 LOCKLIN DR
LIBERTY HILL TX 78642-2137

MR BRYCE P MCCORMICK
NORTH SAN GABRIEL ALLIANCE
1250 COUNTY ROAD 208
FLORENCE TX 76527-4628

TIMOTHY MCDANIEL
1800 COUNTY ROAD 208
FLORENCE TX 76527-4235

T J MCDONALD
900 COUNTY ROAD 236
FLORENCE TX 76527-4835

LYLE A MCELDERRY
406 WYNDHAM HILL PKWY
TEMPLE TX 76502-1974

KELLEY MCGHIE
304 REMUDA
LIBERTY HILL TX 78642-4550

RONAL DALTON MCLLOUD
4810 COUNTY ROAD 207
LIBERTY HILL TX 78642-4023

SUSAN MECKEL
LOWER COLORADO RIVER AUTHORITY
L106
PO BOX 220
AUSTIN TX 78767-0220

ANDRES MENDEZ
330 MISTY WOOD
BERTRAM TX 78605-4486

MRS NOOR AGHA MENDEZ
330 MISTY WOOD
BERTRAM TX 78605-4486

JANNAH MERSIOVSKY
109 TAMBRA LEA LN
LIBERTY HILL TX 78642-2359

ALLISON METCALFE
1200 ASH DR
MARBLE FALLS TX 78654-7231

ANDREW S MILLER
KEMP SMITH LLP
STE 205
2905 SAN GABRIEL ST
AUSTIN TX 78705-3500

KAREN MILONE
208 N HAVEN DR
LIBERTY HILL TX 78642-2387

KENNITH MOHR
PO BOX 1686
CEDAR PARK TX 78630-1686

MONICA MONK
750 ABBEY RD
LIBERTY HILL TX 78642-3996

JAMES MONK
750 ABBEY RD
LIBERTY HILL TX 78642-3996

CONNIE MOORE
112 HOOT OWL LN N
LEANDER TX 78641-1727

HENRY N MULVIHILL JR
PO BOX 831945
RICHARDSON TX 75083-1945

PATRICIA MULVIHILL
NORTH SAN GABRIEL ALLIANCE
8 LUNDYS LN
RICHARDSON TX 75080-2343

SHEILA NARDELLI
530 ABBEY RD
LIBERTY HILL TX 78642-3994

ROSANA NAREZ
PO BOX 93331
SOUTHLAKE TX 76092-0113

ROSANA NAREZ
TEX-MEX NEWS
PO BOX 8665
WACO TX 76714-8665

CASEY NASH
7603 ISLANDER DR
AUSTIN TX 78749-3028

CINDY NASH
205 ENCORE DR
LIBERTY HILL TX 78642-2147

165848

IP/PROT

5/23/2022
APP-00645

JAKE NORMAN
1500 COUNTY ROAD 225
FLORENCE TX 76527-3852

KIRSTEN NOTTAGE
115 LIMONITE LN
LIBERTY HILL TX 78642-4690

NICK NOVO
116 SHADY OAKS TRL
LIBERTY HILL TX 78642-3945

SARAH NOVO
116 SHADY OAKS TRL
LIBERTY HILL TX 78642-3945

MARK NUNEZ
CITY OF HUTTO
356 COUNTY ROAD 199
HUTTO TX 78634-4271

ABBY OGLETREE
425 CANADIAN SPRINGS DR
LEANDER TX 78641-3528

MRS BRITTNEY ORTIZ
120 COUNTY ROAD 279
LIBERTY HILL TX 78642-4245

MR JOE OWEN
OWEN HOLDINGS
4718 MILL CREEK RD
DALLAS TX 75244-6916

MRS REBECCA R OWENS
20307 MCSHEPHERD RD
GEORGETOWN TX 78626-9320

MRS HEATHER PACHECO
201 COWBOY TRL
LIBERTY HILL TX 78642-3954

LAURIE F PAIR
PO BOX 5908
AUSTIN TX 78763-5908

JEROME PALMER
333 HIDDEN OAKS LN
LIBERTY HILL TX 78642-3726

MR CARVEY LEE PARKJER
105 ROSA DR
LIBERTY HILL TX 78642-2190

TANARA PATEL
128 RAVELLO ST
LIBERTY HILL TX 78642-2306

EMILY PATTERSON
140 PARRYI CV
LEANDER TX 78641-4720

BONNIE PEARSON
5545 COUNTY ROAD 200
LIBERTY HILL TX 78642-3721

RON PEARSON
5545 COUNTY ROAD 200
LIBERTY HILL TX 78642-3721

RENEE PEYTON
132 KRUPP AVE
LIBERTY HILL TX 78642-4476

CHRIS PEYTON
132 KRUPP AVE
LIBERTY HILL TX 78642-4476

CARLA PICINICH
2101 COUNTY ROAD 226
FLORENCE TX 76527-4868

MRS CORRINA POINTER
162 ELISHA DR
LIBERTY HILL TX 78642-2257

PATTI PORTER
411 BLESSING RANCH RD
LIBERTY HILL TX 78642-4588

BRYAN PRIMROSE
3901 COUNTY ROAD 258
LIBERTY HILL TX 78642-2106

GINA RAHBARI
232 HOOT OWL LN N
LEANDER TX 78641-1733

TRAVIS REDDING
595 GATLIN RANCH RD
LIBERTY HILL TX 78642-3312

BESSIE RHODES
14814 KINGSFORD WILLOW LN
CYPRESS TX 77429-7918

JAMES RICHARDSON
131 SADDLE LN
LIBERTY HILL TX 78642-4065

LARRY A RIDOLFI
FTL DRIVES INC
1051 COUNTY ROAD 204
LIBERTY HILL TX 78642-3792

DAVID RIVERA
105 LARK ST
LEANDER TX 78641-1890

ERIKA RIX
251 COUNTY ROAD 203
LIBERTY HILL TX 78642-3714

165848

JP/PROT

5/23/2022
APP-00646

RANDAL ROBBINS
249 COWBOY TRL
LIBERTY HILL TX 78642-3954

WHITNEY ROBBINS
441 SIERRA MAR LOOP
LEANDER TX 78641-3544

CHRIS ROBION
104 REINDEER WAY
GEORGETOWN TX 78626-2547

MARK ROCKE
6433 COUNTY ROAD 200
LIBERTY HILL TX 78642-4026

MARIA YOLANDA ROCKE
6433 COUNTY ROAD 200
LIBERTY HILL TX 78642-4026

KATY ROSS
614 SAN GABRIEL RANCH RD
LIBERTY HILL TX 78642-4555

MARGARET RUSSELL
RR 1 BOX 35
TEXHOMA OK 73949-9719

CHARLES RUSSELL
RR 1 BOX 93
TEXHOMA OK 73949-9634

SUSAN RUSSELL
RR 1 BOX 93
TEXHOMA OK 73949-9634

LEM RUSSELL
PO BOX 1294
STRATFORD TX 79084-1294

CARI SALAZAR
301 DANIEL XING
LIBERTY HILL TX 78642-4499

KENNETH & RITA SCHOEN
1437 SLAWSON LN
KILLEEN TX 76542-4271

BRIAN SCOTT
300 ABBEY RD
LIBERTY HILL TX 78642-3953

BILL SHIER
8429 BANGOR BND
AUSTIN TX 78758-7901

ELLEN SKOVIERA
1110 OAKLANDS DR
ROUND ROCK TX 78681-2702

NINA SMART
212 KINGFISHER LN
LEANDER TX 78641-2691

STEVEN SMELTZER
ALAMO AREA COUNCIL OF GOVERNMENTS
STE 160
8700 TESORO DR
SAN ANTONIO TX 78217-6208

STEVEN SMELTZER
ALAMO AREA COUNCIL OF GOVERNMENTS
STE 110
2700 NE LOOP 410
SAN ANTONIO TX 78217-4840

WANDA SMITH
900 COUNTY ROAD 236
FLORENCE TX 76527-4835

ROBERT SMITH
923 CASHEW LN
CEDAR PARK TX 78613-3241

MR S SORENSON
BRUSH BEND PROPERTY OWNERS ASSOC
901 BRUSHY BEND DR
ROUND ROCK TX 78681-1401

MICHELE STANFIELD
100 BUTTERCUP TRL
GEORGETOWN TX 78633-4746

HEATHER STONEHILL-GARCIA
441 FALCON LN
LEANDER TX 78641-1771

TIFFANY STOUT
405 LAKE SIDE DR
GEORGETOWN TX 78628-6902

MR THOMAS L SWINT
2809 FRESH SPRING RD
PFLUGERVILLE TX 78660-2381

CALVIN TAIT
103 RIO ANCHO BLVD
LIBERTY HILL TX 78642-3570

JEN TAYLOR
193 HOUSEFINCH LOOP
LEANDER TX 78641-1961

MICHAEL D THANE
3400 SUNRISE RD
ROUND ROCK TX 78665-2398

TIM THRASH
865 COUNTY ROAD 208
FLORENCE TX 76527-4865

ALLISON THRASH
15100 FM 2769
VOLENTE TX 78641-9139

165848

JP/PROT

5/23/2022
APP-00647

SANDRA LEE THURMAN
190 COUNTY ROAD 208
FLORENCE TX 76527-4472

MASON TINSLEY
11 N BENTON WOODS CIR
THE WOODLANDS TX 77382-1513

SUZE TREACY
2710 GLENWOOD TRL
CEDAR PARK TX 78613-5128

TERESA TUCKER
5050 COUNTY ROAD 236
LIBERTY HILL TX 78642-3730

PAUL KEITH TURNER
377 SUNDANCE TRL
LIBERTY HILL TX 78642-3851

TRACEY VAANDRAGER
701 BRIZENDINE RD
LIBERTY HILL TX 78642-3991

BRITTANY D VARNER
PO BOX 1532
LIBERTY HILL TX 78642-1532

LAURA S WALLACE
3204 AZTEC FALL CV
AUSTIN TX 78746-1573

FRANKIE WALLER
80 COUNTY ROAD 208
FLORENCE TX 76527-4484

HAROLD C WARDLAW
19910 PARK RNCH
SAN ANTONIO TX 78259-1934

SUSAN M WARHOL
1260 COUNTY ROAD 208
FLORENCE TX 76527-4628

JASON WATKINS
308 BLESSING RANCH RD
LIBERTY HILL TX 78642-4505

NIKKI WATKINS
51 COUNTY ROAD 153
GEORGETOWN TX 78626-1926

NANCY WEBBER
4128 LAWLESS ST
AUSTIN TX 78723-5393

SCOTT WEISSE
212 RIETI PKWY
LIBERTY HILL TX 78642-2309

CHARLES WEMPE
6589 COUNTY ROAD 200
LIBERTY HILL TX 78642-3983

GREGORY J WHITE IND PRETREAT
CEDAR PARK PUBLIC WORKS DEPT
2315 BRUSHY CREEK LOOP
CEDAR PARK TX 78613-3162

SHANNON WHITE-SHUBERT
3404 CORTINA LN
ROUND ROCK TX 78681-2417

KIMBERLY WHITNEY
475 COUNTY ROAD 218
FLORENCE TX 76527-4634

SKYLER WHITTLESEY
220 ARREZO LN
GEORGETOWN TX 78628-7071

MR KEITH WILCOX
PO BOX 640
FLORENCE TX 76527-0640

HAZIEL WILLIAMS
19926 PARK HOLW
SAN ANTONIO TX 78259-1924

CHARLES R WILLIAMS
19926 PARK HOLW
SAN ANTONIO TX 78259-1924

ASHLEY WILLIAMS
APT 136
1616 W DALLAS ST
HOUSTON TX 77019-4770

SAMANTHA WOOLF
305 LA DERA DR
LIBERTY HILL TX 78642-2122

MR ROBERT WOOLF
305 LA DERA DR
LIBERTY HILL TX 78642-2122

165848

JP/PROT

5/23/2022
APP-00648

Georgia Carroll-Warren

From: Lori Rowe
Sent: Monday, May 23, 2022 11:57 AM
To: Georgia Carroll-Warren
Subject: FW: TEXAS REGISTER ACKNOWLEDGMENT OF RECEIPT

For your records, I am forwarding you this confirmation of the submission of your item to the Texas Register.

Lori Rowe
Office of the Chief Clerk
Final Documents Team
(512) 239-3331

-----Original Message-----

From: TexReg@sos.texas.gov <TexReg@sos.texas.gov>
Sent: Monday, May 23, 2022 11:44 AM
To: Lori Rowe <Lori.Rowe@tceq.texas.gov>
Subject: TEXAS REGISTER ACKNOWLEDGMENT OF RECEIPT

ACKNOWLEDGMENT OF RECEIPT

Please note that this email acknowledges receipt of your filing only. If we find that the document or submission form does not conform to statutory filing requirements or our administrative rules, we may refuse to accept it for filing and publication. If we refuse your filing, we will notify you.

TRD Number: 202201996
For Issue of: 06/03/2022

Submission Date: 2022-05-23 11:40 AM
Receipt Date: 2022-05-23 11:43 AM

Miscellaneous Document Submission

Agency Name: Texas Commission on Environmental Quality
Agency Code: 0152
Liaison: Lori Rowe
Title of Document: Amended Notice of Public Meeting for an Air Quality Permit (Amended to clarify the date of the meeting): Proposed Permit Number: 165848

File Name: 2PM05232022.docx

Georgia Carroll-Warren

From: Brad Patterson
Sent: Monday, May 23, 2022 7:19 AM
To: Georgia Carroll-Warren
Cc: Deanna Avalos
Subject: FW: Exfluor notice
Attachments: 165848_Exfluor_PM Notice_EDedit.docx (amended).docx

Hi Georgia:

We need to issue an amended meeting notice for the Exfluor meeting on 6/16. The original notice omitted the year (2022) from the date of the meeting in the notice. The attached notice has been approved by Legal. Please assign this notice to be issued and mailed as soon as possible. It can be processed like any other meeting notice.

Let me know if you have any questions.

Thanks, bp.

From: Amanda Kraynok <Amanda.Kraynok@tceq.texas.gov>
Sent: Friday, May 20, 2022 4:47 PM
To: Brad Patterson <Brad.Patterson@tceq.texas.gov>
Cc: Betsy Peticolas <Betsy.Peticolas@Tceq.Texas.Gov>; Deanna Avalos <Deanna.Avalos@tceq.texas.gov>
Subject: RE: Exfluor notice

I have no additional edits.

CONFIDENTIALITY NOTICE:

THE INFORMATION IN THIS EMAIL IS CONFIDENTIAL, PRIVILEGED ATTORNEY-CLIENT COMMUNICATION, OR ATTORNEY WORK-PRODUCT. DO NOT DISTRIBUTE OUTSIDE TCEQ WITHOUT THE EXPRESS CONSENT OF THE OFFICE OF LEGAL SERVICES.

Sincerely,

Amanda Kraynok
Texas Commission on Environmental Quality
Office of Legal Services, Environmental Law Division
(512) 239-0633
amanda.kraynok@tceq.texas.gov

From: Brad Patterson <Brad.Patterson@tceq.texas.gov>
Sent: Friday, May 20, 2022 4:31 PM
To: Amanda Kraynok <Amanda.Kraynok@tceq.texas.gov>
Cc: Betsy Peticolas <Betsy.Peticolas@Tceq.Texas.Gov>; Deanna Avalos <Deanna.Avalos@tceq.texas.gov>
Subject: RE: Exfluor notice

Please review and approve the attached notice. I added the word "Amended" to the title, added a sentence to explain the amendment, and added emphasis to the year in the date of the meeting.

Once we hear back from you, we will get it in the mail as soon as possible.

Thank you,

Brad Patterson
TCEQ Office of the Chief Clerk
(512) 239-1201

From: Amanda Kraynok <Amanda.Kraynok@tceq.texas.gov>
Sent: Friday, May 20, 2022 4:19 PM
To: Brad Patterson <Brad.Patterson@tceq.texas.gov>
Cc: Betsy Peticolas <Betsy.Peticolas@Tceq.Texas.Gov>
Subject: RE: Exflur notice

Brad:

If there is time to amend the notice, I think we should amend it.

CONFIDENTIALITY NOTICE:

THE INFORMATION IN THIS EMAIL IS CONFIDENTIAL, PRIVILEGED ATTORNEY-CLIENT COMMUNICATION, OR ATTORNEY WORK-PRODUCT. DO NOT DISTRIBUTE OUTSIDE TCEQ WITHOUT THE EXPRESS CONSENT OF THE OFFICE OF LEGAL SERVICES.

Sincerely,

Amanda Kraynok
Texas Commission on Environmental Quality
Office of Legal Services, Environmental Law Division
(512) 239-0633
amanda.kraynok@tceq.texas.gov

From: Brad Patterson <Brad.Patterson@tceq.texas.gov>
Sent: Friday, May 20, 2022 1:57 PM
To: Amanda Kraynok <Amanda.Kraynok@tceq.texas.gov>
Subject: Exflur notice

Hi Amanda:

Please see the attached meeting notice. The meeting date omits the year (2022). Do you think we should do an amended meeting notice?

Thanks, bp.

From: Deanna Avalos <Deanna.Avalos@tceq.texas.gov>
Sent: Friday, May 20, 2022 1:46 PM
To: Brad Patterson <Brad.Patterson@tceq.texas.gov>
Subject: More Friday Issues

Brad,

I don't know if this is a big deal, but the solution is easy.

The attached notice does not have the year 2022 cited with the date of the meeting. I'm sure that is my error. Does it need to be mailed again?

Application Exhibit 29

Public Meeting Materials

Texas Commission on Environmental Quality

INTEROFFICE MEMORANDUM

Date: June 17, 2022

To: Office of the Chief Clerk Docket Room

From: Brad Patterson, Office of the Chief Clerk

Re: Exflur Research Corporation; Permit No. 165848

Attached please find the following materials from the public meeting on Exflur Research Corporation; Permit No. 165848, held June 16, 2022, in Florence:

1. 2CDs,
2. 8 written comments, and
3. registration forms

Approximately 120 people attended the meeting. Sixteen individuals provided formal oral comments.

cc: Cara Hill, Air Permits Division
Amanda Kraynok, Environmental Law Division

TCEQ Registration Form

June 16, 2022

Exflor Research Corporation Proposed Air Quality Permit No. 165848

PLEASE PRINT

Name: Kevin Bierschenk

Mailing Address: 504 Ridgmar Rd, Leander TX 78641

Physical Address (if different): _____

City/State: Leander, TX Zip: 78641

****This information is subject to public disclosure under the Texas Public Information Act****

Email: kevbiers kevbier@hotmail.com

Phone Number: (512) 762-9033

- Are you here today representing a municipality, legislator, agency, or group? Yes No

If yes, which one? _____

Please add me to the mailing list.

I wish to provide formal *ORAL COMMENTS* at tonight's public meeting.

I wish to provide formal *WRITTEN COMMENTS* at tonight's public meeting.

(Written comments may be submitted at any time during the meeting)

Please give this form to the person at the information table. Thank you.

TCEQ Registration Form

June 16, 2022

Exflur Research Corporation Proposed Air Quality Permit No. 165848

PLEASE PRINT

Name: D. LARRY BREDTHAUER

Mailing Address: 3360 CR 282 LEANDER, TX 78641

Physical Address (if different): 6449 CR 200

City/State: LIBERTY HILL, TX Zip: 78642

****This information is subject to public disclosure under the Texas Public Information Act****

Email: LBREDTHAUER@YAHOO.COM

Phone Number: (512) 300-6283

- Are you here today representing a municipality, legislator, agency, or group? Yes No

If yes, which one? _____

Please add me to the mailing list.

I wish to provide formal *ORAL COMMENTS* at tonight's public meeting.

I wish to provide formal *WRITTEN COMMENTS* at tonight's public meeting.

(Written comments may be submitted at any time during the meeting)

Please give this form to the person at the information table. Thank you.

TCEQ Registration Form

June 16, 2022

Exflur Research Corporation Proposed Air Quality Permit No. 165848

PLEASE PRINT

Name: Robert Carwell

Mailing Address: 6600 County Rd 200

Physical Address (if different): _____

City/State: Liberty Hill Zip: 78642

****This information is subject to public disclosure under the Texas Public Information Act****

Email: carwellboba@gmail.com

Phone Number: (512) 771-7515

• Are you here today representing a municipality, legislator, agency, or group? Yes No

If yes, which one? _____

Please add me to the mailing list.

I wish to provide formal *ORAL COMMENTS* at tonight's public meeting.

I wish to provide formal *WRITTEN COMMENTS* at tonight's public meeting.

(Written comments may be submitted at any time during the meeting)

Please give this form to the person at the information table. Thank you.

TCEQ Registration Form

June 16, 2022

Exflur Research Corporation Proposed Air Quality Permit No. 165848

PLEASE PRINT

Name: Megan and Jude Coe

Mailing Address: 1235 River Ridge Ranch Rd

Physical Address (if different): _____

City/State: Killeen, TX Zip: 76549

This information is subject to public disclosure under the Texas Public Information Act

Email: meganvarvircoe@gmail.com

Phone Number: (972) 358-9666

- Are you here today representing a municipality, legislator, agency, or group? Yes No

If yes, which one? _____

Please add me to the mailing list.

I wish to provide formal *ORAL COMMENTS* at tonight's public meeting.

I wish to provide formal *WRITTEN COMMENTS* at tonight's public meeting.

(Written comments may be submitted at any time during the meeting)

Please give this form to the person at the information table. Thank you.

TCEQ Registration Form

June 16, 2022

Exflur Research Corporation Proposed Air Quality Permit No. 165848

PLEASE PRINT

Name: Terry Cook

Mailing Address: 3116 GoldenOak Cir

Physical Address (if different): _____

City/State: Round Rock TX Zip: 78681

****This information is subject to public disclosure under the Texas Public Information Act****

Email: terry.cook@welco.org

Phone Number: (512) 244-8610

- Are you here today representing a municipality, legislator, agency, or group? Yes No

If yes, which one? Wilkinson County

Please add me to the mailing list.

I wish to provide formal *ORAL COMMENTS* at tonight's public meeting.

I wish to provide formal *WRITTEN COMMENTS* at tonight's public meeting.

(Written comments may be submitted at any time during the meeting)

Please give this form to the person at the information table. Thank you.

TCEQ Registration Form

June 16, 2022

Exflur Research Corporation Proposed Air Quality Permit No. 165848

PLEASE PRINT

Name: Phebe Davol

Mailing Address: 5675 W. FM 487

Physical Address (if different): _____

City/State: Florence TX Zip: 76527

****This information is subject to public disclosure under the Texas Public Information Act****

Email: phebe.davol@gmail.com

Phone Number: (512) 917-0423

- Are you here today representing a municipality, legislator, agency, or group? Yes No

If yes, which one? _____

Please add me to the mailing list.

I wish to provide formal *ORAL COMMENTS* at tonight's public meeting.

I wish to provide formal *WRITTEN COMMENTS* at tonight's public meeting.

(Written comments may be submitted at any time during the meeting)

Please give this form to the person at the information table. Thank you.

TCEQ Registration Form

June 16, 2022

Exflur Research Corporation Proposed Air Quality Permit No. 165848

PLEASE PRINT

Name: Wayne Eaton

Mailing Address: P.O. Box 14

Physical Address (if different): Hwy 2657

City/State: Briggs, Tx. Zip: 78608

****This information is subject to public disclosure under the Texas Public Information Act****

Email: Wayneaton8@gmail.com

Phone Number: (512) 497-0663

- Are you here today representing a municipality, legislator, agency, or group? Yes No

If yes, which one? North San Gabriel Alliance.org

Please add me to the mailing list.

I wish to provide formal *ORAL COMMENTS* at tonight's public meeting.

I wish to provide formal *WRITTEN COMMENTS* at tonight's public meeting.

(Written comments may be submitted at any time during the meeting)

Please give this form to the person at the information table. Thank you.

TCEQ Registration Form

June 16, 2022

Exflor Research Corporation Proposed Air Quality Permit No. 165848

PLEASE PRINT

Name: Bob & Lana Ellis

Mailing Address: 11602 Sweetwater Trail

Physical Address (if different): _____

City/State: Austin Zip: 78750

****This information is subject to public disclosure under the Texas Public Information Act****

Email: _____

Phone Number: () _____

- Are you here today representing a municipality, legislator, agency, or group? Yes No

If yes, which one? _____

Please add me to the mailing list.

I wish to provide formal *ORAL COMMENTS* at tonight's public meeting.

I wish to provide formal *WRITTEN COMMENTS* at tonight's public meeting.

(Written comments may be submitted at any time during the meeting)

Please give this form to the person at the information table. Thank you.

TCEQ Registration Form

June 16, 2022

Exflor Research Corporation Proposed Air Quality Permit No. 165848

PLEASE PRINT

Name: Raymond & Zakata Elmore

Mailing Address: 4155 CR 223 Kempner, Tx 76539

Physical Address (if different): _____

City/State: Kempner, Tx. Zip: 76539

****This information is subject to public disclosure under the Texas Public Information Act****

Email: elmore1993@gmail.com

Phone Number: (817) 578-4019

- Are you here today representing a municipality, legislator, agency, or group? Yes No

If yes, which one? North San Gabriel Alliance

Please add me to the mailing list.

I wish to provide formal *ORAL COMMENTS* at tonight's public meeting.

I wish to provide formal *WRITTEN COMMENTS* at tonight's public meeting.

(Written comments may be submitted at any time during the meeting)

Please give this form to the person at the information table. Thank you.

TCEQ Registration Form

June 16, 2022

Exflur Research Corporation Proposed Air Quality Permit No. 165848

PLEASE PRINT

Name: Sheryl Farley

Mailing Address: 6600 County Rd 200

Physical Address (if different): _____

City/State: Liberty Hill Zip: 78642

This information is subject to public disclosure under the Texas Public Information Act

Email: sheryl.farley@gmail.com

Phone Number: (512) 771-7539

- Are you here today representing a municipality, legislator, agency, or group? Yes No

If yes, which one? _____

Please add me to the mailing list. only email already on list

I wish to provide formal *ORAL COMMENTS* at tonight's public meeting.

I wish to provide formal *WRITTEN COMMENTS* at tonight's public meeting.

(Written comments may be submitted at any time during the meeting)

Please give this form to the person at the information table. Thank you.

TCEQ Registration Form

June 16, 2022

Exflor Research Corporation Proposed Air Quality Permit No. 165848

PLEASE PRINT

Name: Benjamin Friou

Mailing Address: 3385 Mesquite Pass

Physical Address (if different): _____

City/State: Seguin, Texas Zip: 78155

****This information is subject to public disclosure under the Texas Public Information Act****

Email: benjaminfriou@gmail.com

Phone Number: (512) 645-7117

• Are you here today representing a municipality, legislator, agency, or group? Yes No

If yes, which one? North San Gabriel Alliance

Please add me to the mailing list.

I wish to provide formal *ORAL COMMENTS* at tonight's public meeting.

I wish to provide formal *WRITTEN COMMENTS* at tonight's public meeting.

(Written comments may be submitted at any time during the meeting)

Please give this form to the person at the information table. Thank you.

TCEQ Registration Form

June 16, 2022

Exflor Research Corporation Proposed Air Quality Permit No. 165848

PLEASE PRINT

Name: Carleen T. Garrett

Mailing Address: 220 Brandy Loop

Physical Address (if different): _____

City/State: Killeen Tx Zip: 76549

****This information is subject to public disclosure under the Texas Public Information Act****

Email: Carleen@garrettacountry.net

Phone Number: (254) 289-7930

- Are you here today representing a municipality, legislator, agency, or group? Yes No

If yes, which one? _____

Please add me to the mailing list.

I wish to provide formal *ORAL COMMENTS* at tonight's public meeting.

I wish to provide formal *WRITTEN COMMENTS* at tonight's public meeting.

(Written comments may be submitted at any time during the meeting)

Please give this form to the person at the information table. Thank you.

TCEQ Registration Form

June 16, 2022

Exflur Research Corporation Proposed Air Quality Permit No. 165848

PLEASE PRINT

Name: Stephanie Garrett

Mailing Address: 1056 Deer Park Rd

Physical Address (if different): _____

City/State: Killeen, TX Zip: 76542

****This information is subject to public disclosure under the Texas Public Information Act****

Email: Stephandmike1218@hotmail.com

Phone Number: (254) 258-1958

- Are you here today representing a municipality, legislator, agency, or group? Yes No

If yes, which one? _____

Please add me to the mailing list.

I wish to provide formal *ORAL COMMENTS* at tonight's public meeting.

I wish to provide formal *WRITTEN COMMENTS* at tonight's public meeting.

(Written comments may be submitted at any time during the meeting)

Please give this form to the person at the information table. Thank you.

TCEQ Registration Form

June 16, 2022

Exflur Research Corporation Proposed Air Quality Permit No. 165848

PLEASE PRINT

Name: Kyle E Shannon Behrer

Mailing Address: 1200 CR 236

Physical Address (if different): _____

City/State: Florence TX Zip: 76527

****This information is subject to public disclosure under the Texas Public Information Act****

Email: qwe195@gmail.com

Phone Number: (502) 509 1457

- Are you here today representing a municipality, legislator, agency, or group? Yes No

If yes, which one? _____

Please add me to the mailing list.

I wish to provide formal *ORAL COMMENTS* at tonight's public meeting.

I wish to provide formal *WRITTEN COMMENTS* at tonight's public meeting.

(Written comments may be submitted at any time during the meeting)

Please give this form to the person at the information table. Thank you.

TCEQ Registration Form
June 16, 2022

Exflur Research Corporation
Proposed Air Quality Permit No. 165848

PLEASE PRINT

Name: CHARLES GROSS

Mailing Address: 5731 COUNTY ROAD 236 ~~LIBERTY HILL, TX 78642~~

Physical Address (if different): _____

City/State: LIBERTY HILL TX Zip: 78642

This information is subject to public disclosure under the Texas Public Information Act

Email: ANOYGRO@GMAIL.COM

Phone Number: (469) 223-8227

- Are you here today representing a municipality, legislator, agency, or group? Yes No

If yes, which one? _____

Please add me to the mailing list.

I wish to provide formal *ORAL COMMENTS* at tonight's public meeting.

I wish to provide formal *WRITTEN COMMENTS* at tonight's public meeting.

(Written comments may be submitted at any time during the meeting)

Please give this form to the person at the information table. Thank you.

TCEQ Registration Form

June 16, 2022

Exflor Research Corporation Proposed Air Quality Permit No. 165848

PLEASE PRINT

Name: Dana R. James

Mailing Address: 725 W. Ridge

Physical Address (if different): _____

City/State: Killeen Tx Zip: 76549

****This information is subject to public disclosure under the Texas Public Information Act****

Email: Ms Cowboy@aol.com

Phone Number: ()

- Are you here today representing a municipality, legislator, agency, or group? Yes No

If yes, which one? _____

Please add me to the mailing list.

I wish to provide formal *ORAL COMMENTS* at tonight's public meeting.

I wish to provide formal *WRITTEN COMMENTS* at tonight's public meeting.

(Written comments may be submitted at any time during the meeting)

Please give this form to the person at the information table. Thank you.

TCEQ Registration Form

June 16, 2022

Exfluor Research Corporation Proposed Air Quality Permit No. 165848

PLEASE PRINT

Name: LARRY JAMES

Mailing Address: 725 H Ridge Dr, KILLEEN, TX 76549

Physical Address (if different): _____

City/State: KILLEEN, TX Zip: 76549

****This information is subject to public disclosure under the Texas Public Information Act****

Email: _____

Phone Number: (_____) _____

- Are you here today representing a municipality, legislator, agency, or group? Yes No

If yes, which one? _____

Please add me to the mailing list.

I wish to provide formal *ORAL COMMENTS* at tonight's public meeting.

I wish to provide formal *WRITTEN COMMENTS* at tonight's public meeting.

(Written comments may be submitted at any time during the meeting)

Please give this form to the person at the information table. Thank you.

TCEQ Registration Form

June 16, 2022

Exflur Research Corporation Proposed Air Quality Permit No. 165848

PLEASE PRINT

Name: JULES KINGDOM

Mailing Address: 400 CA 228

Physical Address (if different): _____

City/State: FLORENCE, TX Zip: 76527

****This information is subject to public disclosure under the Texas Public Information Act****

Email: juleskingdom@gmail.com

Phone Number: (512) 689-7195

- Are you here today representing a municipality, legislator, agency, or group? Yes No

If yes, which one? _____

Please add me to the mailing list.

I wish to provide formal *ORAL COMMENTS* at tonight's public meeting.

I wish to provide formal *WRITTEN COMMENTS* at tonight's public meeting.

(Written comments may be submitted at any time during the meeting)

Please give this form to the person at the information table. Thank you.

TCEQ Registration Form

June 16, 2022

Exflur Research Corporation Proposed Air Quality Permit No. 165848

PLEASE PRINT

Name: MARILYN LEGAULT

Mailing Address: 501 CR 266

Physical Address (if different): _____

City/State: COTWENT Zip: 78628

****This information is subject to public disclosure under the Texas Public Information Act****

Email: LEGAULT.MARILYN@GMAIL.COM

Phone Number: (214) 515 6880

- Are you here today representing a municipality, legislator, agency, or group? Yes No

If yes, which one? _____

Please add me to the mailing list.

I wish to provide formal *ORAL COMMENTS* at tonight's public meeting.

I wish to provide formal *WRITTEN COMMENTS* at tonight's public meeting.

(Written comments may be submitted at any time during the meeting)

Please give this form to the person at the information table. Thank you.

TCEQ Registration Form

June 16, 2022

Exflor Research Corporation Proposed Air Quality Permit No. 165848

PLEASE PRINT

Name: Anselmo R. Susana Martinez

Mailing Address: 924 County Rd 236

Physical Address (if different): _____

City/State: Florence TX Zip: 76527

****This information is subject to public disclosure under the Texas Public Information Act****

Email: anselmomartinez@aqt.net

Phone Number: () _____

- Are you here today representing a municipality, legislator, agency, or group? Yes No

If yes, which one? _____

Please add me to the mailing list.

I wish to provide formal *ORAL COMMENTS* at tonight's public meeting.

I wish to provide formal *WRITTEN COMMENTS* at tonight's public meeting.

(Written comments may be submitted at any time during the meeting)

Please give this form to the person at the information table. Thank you.

TCEQ Registration Form

June 16, 2022

Exflur Research Corporation Proposed Air Quality Permit No. 165848

PLEASE PRINT

Name: Linda Martinez

Mailing Address: 1044 River Ranch Rd. Liberty Hill

Physical Address (if different): _____

City/State: Liberty Hill, TX. Zip: 78642

****This information is subject to public disclosure under the Texas Public Information Act****

Email: le @ keystone.concrete.com lmartini21 @ uphoo.com

Phone Number: (713) 498-2341

- Are you here today representing a municipality, legislator, agency, or group? Yes No

If yes, which one? _____

Please add me to the mailing list.

I wish to provide formal *ORAL COMMENTS* at tonight's public meeting.

I wish to provide formal *WRITTEN COMMENTS* at tonight's public meeting.

(Written comments may be submitted at any time during the meeting)

Please give this form to the person at the information table. Thank you.

TCEQ Registration Form

June 16, 2022

Exflur Research Corporation Proposed Air Quality Permit No. 165848

PLEASE PRINT

Name: Pamela Matau

Mailing Address: 820 CR 266, Georgetown 78628

Physical Address (if different): Same

City/State: _____ Zip: 75628

****This information is subject to public disclosure under the Texas Public Information Act****

Email: pmatau@gmail.com

Phone Number: (512) 791-5032

- Are you here today representing a municipality, legislator, agency, or group? Yes No

If yes, which one? _____

Please add me to the mailing list.

I wish to provide formal *ORAL COMMENTS* at tonight's public meeting.

I wish to provide formal *WRITTEN COMMENTS* at tonight's public meeting.

(Written comments may be submitted at any time during the meeting)

Please give this form to the person at the information table. Thank you.

did not speak

TCEQ Registration Form

June 16, 2022

Exflur Research Corporation Proposed Air Quality Permit No. 165848

PLEASE PRINT

Name: HENRY MULVIHILL

Mailing Address: 8 LUNNYS LANE

Physical Address (if different): _____

City/State: RICHARDSON, TX Zip: 75080

****This information is subject to public disclosure under the Texas Public Information Act****

Email: theplano@sabell.net

Phone Number: (214) 790 2591

• Are you here today representing a municipality, legislator, agency, or group? Yes No

If yes, which one? NORTH SAN GABRIEL ALLIANCE / SELF

Please add me to the mailing list.

I wish to provide formal *ORAL COMMENTS* at tonight's public meeting.

I wish to provide formal *WRITTEN COMMENTS* at tonight's public meeting.

(Written comments may be submitted at any time during the meeting)

Please give this form to the person at the information table. Thank you.

TCEQ Registration Form

June 16, 2022

Exflur Research Corporation Proposed Air Quality Permit No. 165848

PLEASE PRINT

Name:

ALOIS PAVLICEK

Mailing Address:

1105 DEER RUN

Physical Address (if different):

City/State:

ROUND ROCK, TX

Zip:

78681

****This information is subject to public disclosure under the Texas Public Information Act****

Email:

LPAVLICEK@ST-WILLIAM.ORG

Phone Number:

(512) 763-6495

- Are you here today representing a municipality, legislator, agency, or group? Yes No

If yes, which one? _____

Please add me to the mailing list.

I wish to provide formal *ORAL COMMENTS* at tonight's public meeting.

I wish to provide formal *WRITTEN COMMENTS* at tonight's public meeting.

(Written comments may be submitted at any time during the meeting)

Please give this form to the person at the information table. Thank you.

TCEQ Registration Form

June 16, 2022

Exflor Research Corporation Proposed Air Quality Permit No. 165848

PLEASE PRINT

Name: Loyd PEARSON

Mailing Address: 351 Co. Rd. 210

Physical Address (if different): LIBERTY HILL, TX

City/State: _____ Zip: 78642

This information is subject to public disclosure under the Texas Public Information Act

Email: _____

Phone Number: (_____) _____

- Are you here today representing a municipality, legislator, agency, or group? Yes No

If yes, which one? _____

Please add me to the mailing list.

I wish to provide formal *ORAL COMMENTS* at tonight's public meeting.

I wish to provide formal *WRITTEN COMMENTS* at tonight's public meeting.

(Written comments may be submitted at any time during the meeting)

Please give this form to the person at the information table. Thank you.

TCEQ Registration Form

June 16, 2022

Exflur Research Corporation Proposed Air Quality Permit No. 165848

PLEASE PRINT

Name: Bryan & Jackie Primrose

Mailing Address: 3901 CR 258, Liberty Hill, TX 78642

Physical Address (if different): _____

City/State: _____ Zip: _____

This information is subject to public disclosure under the Texas Public Information Act

Email: jackie.primrose@socialindoor.com

Phone Number: (512) 219-5010

- Are you here today representing a municipality, legislator, agency, or group? Yes No

If yes, which one? _____

Please add me to the mailing list.

I wish to provide formal *ORAL COMMENTS* at tonight's public meeting.

I wish to provide formal *WRITTEN COMMENTS* at tonight's public meeting.

(Written comments may be submitted at any time during the meeting)

Please give this form to the person at the information table. Thank you.

TCEQ Registration Form

June 16, 2022

Exflor Research Corporation Proposed Air Quality Permit No. 165848

PLEASE PRINT

Name: Rudy Ridolfi

Mailing Address: 1051 CR 204

Physical Address (if different): _____

City/State: Liberty Hill, Texas Zip: 78642

****This information is subject to public disclosure under the Texas Public Information Act****

Email: wcsorc@a.com

Phone Number: (703) 608 8284

- Are you here today representing a municipality, legislator, agency, or group? Yes No

If yes, which one? _____

Please add me to the mailing list.

I wish to provide formal *ORAL COMMENTS* at tonight's public meeting.

I wish to provide formal *WRITTEN COMMENTS* at tonight's public meeting.

(Written comments may be submitted at any time during the meeting)

Please give this form to the person at the information table. Thank you.

TCEQ Registration Form

June 16, 2022

Exflur Research Corporation Proposed Air Quality Permit No. 165848

PLEASE PRINT

Name: Billy Rives

Mailing Address: 9755 E. FM 243

Physical Address (if different): _____

City/State: Bertonia Tex Zip: 98608

****This information is subject to public disclosure under the Texas Public Information Act****

Email: billy@billyrives.com

Phone Number: (512) 924 6023

• Are you here today representing a municipality, legislator, agency, or group? Yes No

If yes, which one? _____

Please add me to the mailing list.

I wish to provide formal *ORAL COMMENTS* at tonight's public meeting.

I wish to provide formal *WRITTEN COMMENTS* at tonight's public meeting.

(Written comments may be submitted at any time during the meeting)

Please give this form to the person at the information table. Thank you.

TCEQ Registration Form

June 16, 2022

Exflur Research Corporation Proposed Air Quality Permit No. 165848

PLEASE PRINT

Name: MARK ROCKE

Mailing Address: 6433 CR. 200

Physical Address (if different): _____

City/State: Liberty Hill TX Zip: 78642

This information is subject to public disclosure under the Texas Public Information Act

Email: MARK.ROCKE@COMCAST.COM

Phone Number: (512) 748-8581

- Are you here today representing a municipality, legislator, agency, or group? Yes No

If yes, which one? _____

Please add me to the mailing list.

I wish to provide formal *ORAL COMMENTS* at tonight's public meeting.

I wish to provide formal *WRITTEN COMMENTS* at tonight's public meeting.

(Written comments may be submitted at any time during the meeting)

Please give this form to the person at the information table. Thank you.

TCEQ Registration Form

June 16, 2022

Exflur Research Corporation Proposed Air Quality Permit No. 165848

PLEASE PRINT

Name: Yolanda Rocke

Mailing Address: 6433 C.R. 200

Physical Address (if different): _____

City/State: Liberty Hill Zip: 78642

****This information is subject to public disclosure under the Texas Public Information Act****

Email: yolierocke@gmail.com

Phone Number: (512) 748-4963

- Are you here today representing a municipality, legislator, agency, or group? Yes No

If yes, which one? _____

Please add me to the mailing list.

I wish to provide formal *ORAL COMMENTS* at tonight's public meeting.

I wish to provide formal *WRITTEN COMMENTS* at tonight's public meeting.

(Written comments may be submitted at any time during the meeting)

Please give this form to the person at the information table. Thank you.

TCEQ Registration Form

June 16, 2022

Exflur Research Corporation Proposed Air Quality Permit No. 165848

PLEASE PRINT

Name: Jennifer Spies

Mailing Address: 8907 RUSTLE CV AUSTON TX 78717

Physical Address (if different): _____

City/State: AUSTIN Zip: 78717

****This information is subject to public disclosure under the Texas Public Information Act****

Email: jcsspies@gmail.com

Phone Number: () 956-286-7123

- Are you here today representing a municipality, legislator, agency, or group? Yes No

If yes, which one? _____

Please add me to the mailing list.

I wish to provide formal *ORAL COMMENTS* at tonight's public meeting.

I wish to provide formal *WRITTEN COMMENTS* at tonight's public meeting.

(Written comments may be submitted at any time during the meeting)

Please give this form to the person at the information table. Thank you.

TCEQ Registration Form

June 16, 2022

Exfluor Research Corporation Proposed Air Quality Permit No. 165848

PLEASE PRINT

Name: Tim + Maureen Thrash

Mailing Address: 865 County Rd. 708

Physical Address (if different): _____

City/State: Florence, TX Zip: 76577

****This information is subject to public disclosure under the Texas Public Information Act****

Email: tim.thrash@sbcglobal.net

Phone Number: (517) 809-7910

• Are you here today representing a municipality, legislator, agency, or group? Yes No

If yes, which one? _____

Please add me to the mailing list.

I wish to provide formal *ORAL COMMENTS* at tonight's public meeting.

I wish to provide formal *WRITTEN COMMENTS* at tonight's public meeting.

(Written comments may be submitted at any time during the meeting)

Please give this form to the person at the information table. Thank you.

TCEQ Registration Form

June 16, 2022

Exfluor Research Corporation Proposed Air Quality Permit No. 165848

PLEASE PRINT

Name: Sandra Thurman

Mailing Address: 190 County Road 208

Physical Address (if different): _____

City/State: Florence, TX Zip: 76527

This information is subject to public disclosure under the Texas Public Information Act

Email: s1thurman1951@gmail.com

Phone Number: (512) 913-5207

- Are you here today representing a municipality, legislator, agency, or group? Yes No

If yes, which one? _____

Please add me to the mailing list.

I wish to provide formal *ORAL COMMENTS* at tonight's public meeting.

I wish to provide formal *WRITTEN COMMENTS* at tonight's public meeting.

(Written comments may be submitted at any time during the meeting)

Please give this form to the person at the information table. Thank you.

TCEQ Registration Form

June 16, 2022

Exflur Research Corporation Proposed Air Quality Permit No. 165848

PLEASE PRINT

Name: Dawn Ulbricht

Mailing Address: 1 Hillway Dr.

Physical Address (if different): _____

City/State: Round Rock, TX Zip: 78664

****This information is subject to public disclosure under the Texas Public Information Act****

Email: ulbricht1231@gmail.com

Phone Number: (512) 247-1137

- Are you here today representing a municipality, legislator, agency, or group? Yes No

If yes, which one? _____

Please add me to the mailing list.

I wish to provide formal *ORAL COMMENTS* at tonight's public meeting.

I wish to provide formal *WRITTEN COMMENTS* at tonight's public meeting.

(Written comments may be submitted at any time during the meeting)

Please give this form to the person at the information table. Thank you.

TCEQ Registration Form

June 16, 2022

Exflur Research Corporation Proposed Air Quality Permit No. 165848

PLEASE PRINT

Name: Bill Wales

Mailing Address: P.O. Box 313

Physical Address (if different): 202 E. Curry St.

City/State: Florence, Texas Zip: 76527

****This information is subject to public disclosure under the Texas Public Information Act****

Email: BWales@centurylink.net

Phone Number: (512) 923-3089

- Are you here today representing a municipality, legislator, agency, or group? Yes No

If yes, which one? _____

Please add me to the mailing list.

I wish to provide formal *ORAL COMMENTS* at tonight's public meeting.

I wish to provide formal *WRITTEN COMMENTS* at tonight's public meeting.

(Written comments may be submitted at any time during the meeting)

Please give this form to the person at the information table. Thank you.

TCEQ Registration Form

June 16, 2022

Exflur Research Corporation Proposed Air Quality Permit No. 165848

PLEASE PRINT

Name: Steve + Lisa Weaver

Mailing Address: 258 CR 250

Physical Address (if different): _____

City/State: Georgetown TX Zip: 78633

****This information is subject to public disclosure under the Texas Public Information Act****

Email: Sweaver450@yahoo.com

Phone Number: (303) 809-9524

- Are you here today representing a municipality, legislator, agency, or group? Yes No

If yes, which one? _____

Please add me to the mailing list.

I wish to provide formal *ORAL COMMENTS* at tonight's public meeting.

I wish to provide formal *WRITTEN COMMENTS* at tonight's public meeting.

(Written comments may be submitted at any time during the meeting)

Please give this form to the person at the information table. Thank you.

TCEQ Registration Form

June 16, 2022

Exflur Research Corporation Proposed Air Quality Permit No. 165848

PLEASE PRINT

Name: Jim and Mary Wilson

Mailing Address: 278 Lampson Court, Killen TX 76549 (Rider Ridge Ranch)

Physical Address (if different): _____

City/State: Killen, TX Zip: 76549

****This information is subject to public disclosure under the Texas Public Information Act****

Email: maryrwilson@gmail.com

Phone Number: (254) 289-5493

- Are you here today representing a municipality, legislator, agency, or group? Yes No

If yes, which one? _____

Please add me to the mailing list.

I wish to provide formal *ORAL COMMENTS* at tonight's public meeting.

I wish to provide formal *WRITTEN COMMENTS* at tonight's public meeting.

(Written comments may be submitted at any time during the meeting)

Please give this form to the person at the information table. Thank you.

TCEQ Registration Form

June 16, 2022

Exflur Research Corporation Proposed Air Quality Permit No. 165848

PLEASE PRINT

Name: Ann Bierschenk

Mailing Address: 590 Young Ranch Rd.

Physical Address (if different): _____

City/State: Georgetown, Tx Zip: 78633

****This information is subject to public disclosure under the Texas Public Information Act****

Email: _____

Phone Number: (_____) _____

- Are you here today representing a municipality, legislator, agency, or group? Yes No

If yes, which one? _____

Please add me to the mailing list.

I wish to provide formal *ORAL COMMENTS* at tonight's public meeting.

I wish to provide formal *WRITTEN COMMENTS* at tonight's public meeting.

(Written comments may be submitted at any time during the meeting)

Please give this form to the person at the information table. Thank you.

Lori Rowe

From: PUBCOMMENT-OCC
Sent: Tuesday, March 29, 2022 4:21 PM
To: PUBCOMMENT-OCC2
Subject: FW: Public comment on Permit Number 165848

ML

From: gwyneth@txenvirolaw.com <gwyneth@txenvirolaw.com>
Sent: Tuesday, March 29, 2022 4:01 PM
To: PUBCOMMENT-OCC <PUBCOMMENT-OCC@tceq.texas.gov>
Subject: Public comment on Permit Number 165848

REGULATED ENTY NAME EXFLUOR RESEARCH

RN NUMBER: RN110969227

PERMIT NUMBER: 165848

DOCKET NUMBER:

COUNTY: WILLIAMSON

PRINCIPAL NAME: EXFLUOR RESEARCH CORPORATION

CN NUMBER: CN602696791

FROM

NAME: Gwyneth Lonergan

E-MAIL: gwyneth@txenvirolaw.com

COMPANY: Perales, Allmon & Ice, P.C.

ADDRESS: 1206 SAN ANTONIO ST
AUSTIN TX 78701-1834

PHONE: 5124696000

FAX: 5124829346

COMMENTS: Please add me to the mailing list.

Application Exhibit 30

TCEQ ED's Response to Comments

TCEQ INTRA-AGENCY TRANSMITTAL MEMO
Executive Director's Response to Comments (RTC)

TEXAS
COMMISSION
ON ENVIRONMENTAL
QUALITY

DATE: September 1, 2022

2022 SEP -1 PM 3: 50

TO: FINAL DOCUMENTS WORK LEAD
OFFICE OF THE CHIEF CLERK (OCC), MC-105

FROM: Amanda Kraynok and Betsy Peticolas
ENVIRONMENTAL LAW DIVISION, MC-173

CHIEF CLERKS OFFICE

1. **Application Information:**

Program Area (Air, Water or Waste): Air
Applicant's Name: Exflour Research Corp.

Permit No.: 165848
Docket/CID Item No. (if known):

2. **Application Subject to SB 709 (received on or after 09/01/15):** Yes No
3. **Were Comments Received in an Alternative Language:** Yes No
4. **Alternative Language Required by 30 TAC § 39.426 or other:** Yes No
 Spanish Other language(s) (please list):
5. **OCC Action Required (check all applicable boxes)**

FOR WASTE & WATER:

- Send RTC with the RTC transmittal letter which solicits hearing requests from commenters and requests for reconsideration to the mailing list in your files. *This occurs in all circumstances when comments have been received for 801 and 709 applications.*

OR

- Send RTC with the Motion to Overturn (MTO) transmittal letter which solicits MTOs to the mailing list in your files. *This occurs when all comments have been withdrawn for 801 or 709 applications, or when comments are received for applications that will not be set for Commissioners' Agenda.*

AND (if applicable)

- Include instructions for translating the RTC in the RTC or MTO transmittal letter or Agenda setting letter. The instructions should include information in both English and the alternative language about how to use available translation tools to translate the RTC. *This occurs when alternative language comments are received, but the RTC has not been translated.*

FOR AIR (NSR only):

- Send RTC with the RTC transmittal letter which solicits hearing requests from commenters and requests for reconsideration to the mailing list in your files. *This occurs only when there are pending contested case hearing requests (except no-increase renewals).*

OR

- Set for Commissioners' Agenda and send RTC with the Agenda setting letter. *This occurs when there are pending contested case hearing requests on a no-increase renewal and technical review is complete.*

OR

- Hold until a Commissioners' Agenda date is requested and send RTC with the Agenda Setting Letter. *This occurs when there are pending contested case hearing requests on a no-increase renewal and technical review is NOT complete. If this box is checked, ED staff must call the OCC Agenda Section Manager to arrange a specific agenda date.*

OR

- Place RTC in file. No further action required by OCC. *This occurs when the matter is uncontested, but comments were received. Air Permits Division will send the RTC with the MTO transmittal letter.*

AND (if applicable)

- Include instructions for translating the RTC in the RTC or MTO transmittal letter or Agenda setting letter. The instructions should include information in both English and the alternative language about how to use available translation tools to translate the RTC. *This occurs when alternative language comments are received, but the RTC has not been translated.*

2022 SEP -1 PM -3 50

CHIEF CLERKS OFFICE

TCEQ AIR QUALITY PERMIT NUMBER 165848

APPLICATION BY	§	BEFORE THE
EXFLUOR RESEARCH CORPORATION	§	TEXAS COMMISSION ON
EXFLUOR RESEARCH	§	ENVIRONMENTAL QUALITY
FLORENCE, WILLIAMSON COUNTY	§	

EXECUTIVE DIRECTOR'S RESPONSE TO PUBLIC COMMENT

The Executive Director of the Texas Commission on Environmental Quality (the commission or TCEQ) files this Response to Public Comment (Response) on the New Source Review Authorization application and Executive Director's preliminary decision.

As required by Title 30 Texas Administrative Code (TAC) § 55.156, before an application is approved, the Executive Director prepares a response to all timely, relevant and material, or significant comments. The Office of Chief Clerk received timely comments from the following persons: Senator Charles Schwertner, Representative Terry M. Wilson, Williamson County Commissioner Cynthia P. Long, Courtney Alcott, Maude McCormick Allen, Sarah Andrews, Nicole Anthony, Federico I. Arce, Mark Baker, Tami Baker, Kristyn Barry, Rebecca Bartels, Robert Lionel Baskind, Stephen David Bauer, Danial Beesley, Don T. Berry, Anne Kathrine Beville, James Blake, Lana Blake, Natalie Blankenbaker, Joy Borjes, Barry L. Bowden, Twila Bowden, Richard Arthur Box, Conor Brace, Whitney Brace, Lindsey Brassfield, Ashley Brooks, Christopher Bunch, Jaime Cadwalader, Alex Campo, Susan G. Carlson, Eileen Carlton, Robert Carwell, Monica Castro, Randa Chapman, Jude P. Coe, Megan Varvir Coe, Vicci Conway, C. D. Cook, Tim Cox, Eric Crop, Grant Cross, Karen Cross, Vasantha Dacha, Corwin E. Davidson, Paul Davidson, Erin Debarbieri, Amy B. Decosmo, Cristin L. Dershem, Mengbing Dong, John G. Dupont, Janet Ellis, Guy Endsley, Lauren Endsley, Morgan Endsley, Tanya Endsley, Franchesca C. Estrada, Jennifer Eyre, Tyler Andrew Eyre, Sheryl Marie Farley, Jeannie Fickel, Anthony Figgins, Jennifer Finkel, Dylan Michael Foley, Amanda Foster, Susanne Fratzke, Elizabeth Ann Friou, Katherine Fuller, Jillian Gabriel, Anna Gandy, Britni Ganze, Brandon Garcia, Kyle Gehrler, Shannon Gehrler, William Patrick George, Richard Grabish, Katlyn Green, Charles Gross, Christi Lachelle Gutierrez, Heinrich Hafner, Denelle Hager, Michelle Loren Hansen, Joanna R. Hayes, Kelley Heath, Chelsey Heil, Glenn Heimbigner, Brenda Hendrickson, James Henley, Jason Hester, Ed Hillis, Alexandra E. Hoeffner, Alexandra Hoeffner, Julia Hollis, Liz Howells, Luann Howland, Rima Huq, Lauren Ice (*on behalf of the North San Gabriel Alliance*), Andrea Jagodzinski, Shawn Jagodzinski, Bineeta Jaiswal, Brian S. Jalufka, Sabrina Jannise, Matthew Johnson, Suzanne Johnson, Tiffany Johnson, Catherine Johnston, Chesley Jones, Nicole Jones, Chris Kalinowski, Molly Kalinowski, Connie Kanetzky, Jerry Kanetzky, Marissa Kanetzky, Erin Kenney, Hemanth Khambhammettu, Karen Kildall, Dolores King, Timothy King, David Kubin, Arun Kumar, Lars Kuslich, Erica Ladden, Ericka Lamanna, Kimm Langston, Lauren Larson, Katrina D. Leal, Gwyneth Lonergan (*on behalf of the North San Gabriel Alliance*), Stephanie Long, Dani Lopez, Jan Love, Babu Madala, Nelson Mak, Alycen Malone, Nichole Manthey, Bryan Martin, John Martin, Sherri Martin, Linda Martinez, Mary Massey, Stacy Mattison, Emma May, Bryce P. McCormick, Charles McCormick, Timothy McDaniel, T. J. McDonald, Kelley McGhie, Ronal Dalton McCloud, Andres Mendez, Noor Agha Mendez, Jannah

Mersiovsky, Danny P. Merton, Allison Metcalfe, Karen Milone, Kenneth Mohr, James Monk, Monica Monk, Connie Moore, Stephanie Ryder Morris, Henry N. Mulvihill, Patricia Mulvihill, Sheila Nardelli, Casey Nash, Cindy Nash, Jake Norman, Kirsten Nottage, Nick Novo, Sarah Novo, Abby Ogletree, Brittney Ortiz, Joe Owen, Rebecca R. Owens, Heather Pacheco, Joe J. Pacheco, Laurie F. Pair, Jerome Palmer, Carvey Lee Parkjer, Tanara Patel, Emily Patterson, Bonnie Pearson, Ron Pearson, Chris Peyton, Renee Peyton, Carla Picinich, Corrina Pointer, Patti Porter, Bryan Primrose, Jackie Primrose, Gina Rahbari, Travis Redding, Ana R. Resto, Bessie Rhodes, James Richardson, Larry A. Ridolfi, David Rivera, Erika Rix, Randal Robbins, Whitney Robbins, Ashton Roberts, James Roberts, Chris Robion, Maria Yolanda Rocke, Mark Rocke, Katy Ross, Charles Russell, Lem Russell, Margaret Russell, Susan Russell, Cari Salazar, Brian Scott, Bill Shier, Mark Shifrin, Ellen Skoviera, Nina Smart, Robert Smith, Wanda Smith, Jennifer Spies, Michele Stanfield, Heather Stonehill-Garcia, Tiffany Stout, Elizabeth Suarez, Thomas L. Swint, Calvin Tait, Jen Taylor, Tim Thrash, Sandra Lee Thurman, Mason Tinsley, Suze Treacy, Larry Tucker, Teresa Tucker, Paul Keith Turner, Tracey Vaandrager, Selena Valdez, Brittany D. Varner, Laura S. Wallace, Frankie Waller, Harold C. Wardlaw, Peggy Wardlaw, Shauna Wardlaw, Susan M. Warhol, Jason Watkins, Nikki Watkins, Scott Weisse, Charles Wempe, Greg Wempe, David Wheelock, Shannon White-Shubert, Kimberly Whitney, Skyler Whittlesey, Keith Wilcox, Ashley Williams, Charles R. Williams, Elizabeth Williams, Haziell Williams, Robert Woolf, and Samantha Woolf. The commenters associated with specific comments relating to a topic are listed in parentheses at the end of each comment. In some instances, a large number of commenters had the same or similar comments and have been associated to their particular comments through the use of groups. The persons attributed to each comment group are listed in Appendix A.

This Response addresses all timely public comments received, whether or not withdrawn. If you need more information about this permit application or the permitting process please call the TCEQ Public Education Program at 1-800-687-4040. General information about the TCEQ can be found at our website at www.tceq.texas.gov.

BACKGROUND

Description of Facility

Exflur Research Corporation (Applicant) has applied to the TCEQ for a New Source Review Authorization under Texas Clean Air Act (TCAA) § 382.0518. This will authorize the construction of a new facility that may emit air contaminants.

This permit will authorize the Applicant to construct the Exflur Research facility. The facility will be located at 1100 County Road 236, Florence, Williamson County. Contaminants authorized under this permit include hydrogen fluorides, carbon monoxide, particulate matter, hazardous air pollutants, nitrogen oxides, and organic compounds.

Procedural Background

Before work is begun on the construction of a new facility that may emit air contaminants, the person planning the construction must obtain a permit from the commission. This permit application is for an initial issuance of Air Quality Permit Number 165848.

The permit application was received on July 9, 2021 and declared administratively complete on July 14, 2021. The Notice of Receipt and Intent to Obtain an Air Quality Permit (first public notice) for this permit application was published in English on July 28, 2021, in the *Williamson County Sun* and in Spanish on July 29, 2021, in *El Mundo*. The Notice of Application and Preliminary Decision for an Air Quality Permit (second public notice) was published on March 6, 2022, in English in the *Williamson County Sun* and in Spanish on March 10, 2022, in *El Mundo*. A public meeting was held on June 16, 2022, in Florence, Texas. The public comment period ended on June 20, 2022. Because this application was received after September 1, 2015, it is subject to the procedural requirements of and rules implementing Senate Bill 709 (84th Legislature, 2015).

COMMENTS AND RESPONSES

COMMENT 1: Public Notice / Comment Period

Commenters expressed concern about public notice of the application. Twila Bowden commented that the facility was being proposed without sufficient public awareness of its nature and possible harm. David Wheelock expressed concern about the ability to locate the draft permit on the TCEQ's website and stated that the record was not complete online. North San Gabriel Alliance expressed concern that the Applicant did not consult nearby landowners before submitting its application and there were details about the technical review process and preparation of the draft permit that were not made available prior to the public meeting. Shannon White-Shubert also expressed concern that existing property owners were not notified when the Applicant purchased the land for the facility.

North San Gabriel Alliance expressed concern that many nearby residents did not learn about the proposed facility until the second notice period. North San Gabriel Alliance also commented that the Applicant did not demonstrate compliance with the notice requirements and should therefore be required to provide the initial notice (first notice of NORI) again in order to reopen the initial comment period. North San Gabriel Alliance and David Wheelock requested that the comment period be extended. North San Gabriel Alliance specifically requested that the comment period be extended for two weeks after the close of the public meeting to allow the public to submit comments after hearing from TCEQ staff and the Applicant's representatives.

(North San Gabriel Alliance, Twila Bowden, David Wheelock, Shannon White-Shubert)

RESPONSE 1: The TCEQ welcomes public participation in the permitting process. The Executive Director instructs applicants to provide public notice, as required by TCEQ rules in Chapter 39 (Public Notice), in accordance with statutory requirements. TCAA § 382.056 requires that an applicant publish a "notice of intent" to obtain a permit

(first public notice) and, in most circumstances, a "notice of preliminary decision" (second public notice). These notices must be published in a newspaper of general circulation in the municipality in which the plant is proposed to be located. If the proposed plant is not located within a municipality, the newspaper should be of general circulation in the municipality nearest to the location or proposed location. As such, individual notice to nearby residents is not required by the statute or TCEQ rules.

The public notice informs the public of its opportunity to make comments and request a public meeting or contested case hearing. The required newspaper notice also invites citizens to request mailed notice on matters of interest by submitting their contact information to the TCEQ Office of the Chief Clerk (OCC). The Executive Director is required to mail notice to persons on mailing lists maintained by the OCC. As stated above, the Notice of Receipt and Intent to Obtain an Air Quality Permit (first public notice) for this permit application was published in English on July 28, 2021, in the *Williamson County Sun* and in Spanish on July 29, 2021, in *El Mundo*. Thus, the initial comment period began on July 28, 2021. However, the first notice inadvertently omitted language denoting that particulate matter (PM) would be authorized to be emitted from the facility. Therefore, the Executive Director determined that the initial notice should be republished to include language concerning PM. A Consolidated Notice of Receipt and Intent to Obtain an Air Quality Permit and Notice of Application and Preliminary Decision for an Air Quality Permit (second public notice) was published on March 6, 2022, in English in the *Williamson County Sun* and in Spanish on March 10, 2022, in *El Mundo*. Therefore, the initial comment period and time period for requesting contested case hearings was also reopened during this time. While commenters have suggested that the Executive Director extend the comment period for an additional two weeks after the close of the public meeting, the Executive Director may only do so for good cause. See 30 TAC § 55.152(a)(8). The permit application, the Executive Director's preliminary decision, the draft permit, and the air quality analysis were made available to the public for inspection as required by TCEQ's rules. The comment period began on July 28, 2021 and ended at the close of the public meeting on June 16, 2022. Accordingly, the Executive Director believes that members of the public had an adequate opportunity to access information about the permit application and has not found good cause for further extending the comment period.

Applicants are required to make a copy of the administratively complete application available for review at a public place in the county in which the plant is proposed to be located. Specifically, 30 TAC § 39.405(g)(1) requires a copy of the administratively complete application to be available for review and copying beginning on the first day of newspaper publication of the first public notice and to remain available during the public comment period. During the second notice period, 30 TAC § 39.405(g)(2) and (3) require a copy of the complete application (including any subsequent revisions) and the ED's preliminary decision, the draft permit, preliminary determination summary, and air quality analysis to be available for public viewing beginning on the first day of the publication of the second public notice. For major source permits (authorized under the Nonattainment New Source Review or Prevention of Significant Deterioration programs), copies of the Executive Director's draft permit and preliminary decision, preliminary determination summary, and air quality analysis are also made available

electronically on the commission's website at the time of publication of the second notice. However, this requirement is not applicable to minor source New Source Review permits, like this one. As described in the notices, the application and associated documents (including the draft permit) were available for viewing and copying at the TCEQ's central office in Austin and at the Eula Hunt Beck Florence Public Library located at 207 East Main Street, Florence, Texas.

To demonstrate compliance with public notice requirements, applicants are required to provide the Office of the Chief Clerk with copies of the published notice and a publisher's affidavit verifying facts related to the publication, including that the newspaper is a paper of general circulation in the municipality in which the proposed facility is located or proposed to be located. The Applicant provided the required forms to the Office of the Chief Clerk.

COMMENT 2: Public Meeting

Conor Brace questioned the chosen location of the public meeting, stating that the Florence High School is a "red-herring location" with little connection to the proposed site. Mr. Brace requested that a "real" public meeting be held in a larger venue to include those populations affected, and specifically requested that residents of Liberty Hill and surrounding areas, Brushy Creek MUD, Georgetown, Round Rock, and the Fort Worth District of the U.S. Army Corps of Engineers be in attendance. Stephanie Ryder Morris commented that both the informal and formal comments should be part of the permit process. Brittany D. Varner expressed concern about the Applicant's answers to certain questions at the public meeting. (North San Gabriel Alliance, Conor Brace, Stephanie Ryder Morris, Brittany D. Varner, Peggy Wardlaw, David Wheelock)

RESPONSE 2: The TCEQ rules require that a public meeting be held if a member of the legislature who represents the general area in which the facility is located requests a public meeting or if the TCEQ Executive Director determines that there is a substantial or significant degree of public interest. Public meetings are open to the public and any member of the public or interested person may attend the meeting. At the request of both citizens and Senator Charles Schwertner and Representative Terry Wilson, a public meeting was held on June 16, 2022, at the Florence High School Cafeteria.

The protocol used in public meetings was explained to the assembled audience in the preliminary remarks prior to the public meeting. Specifically, it was explained that the meeting would consist of two parts, the first being an informal discussion to ask and answer questions while the second part was a formal discussion in which the audience could provide comments that would be recorded for the official public record and responded to in writing. This information is also stated in the meeting notification that was mailed to everyone on the OCC's mailing list prior to the public meeting. The informal portion of the meeting is not designed for the taking of public comment; rather, it provides an opportunity to ask questions of both the applicant and the TCEQ staff. However, to the extent that comments are made during the informal part of the meeting, any person wishing for a written response may re-submit those comments during the formal portion of the public meeting (either orally or in writing). This Response is the written response to all formal comments received during the comment

period for the application, including those received at the public meeting, through the TCEQ's online commenting system, or by mail. A copy of this Response will be sent to each person who submitted a formal comment, a public meeting request, or a request for a contested case hearing or who requested to be on the mailing list for this permit application and provided a mailing address. All timely formal comments received are included in this Response and will be considered before a final decision is reached on the permit application.

COMMENT 3: Sign Posting

North San Gabriel Alliance Commenters questioned if the sign posting requirements were met, specifically questioning whether both English and Spanish signs were posted for the entirety of the public comment period. North San Gabriel Alliance commented that there was no evidence that the Applicant complied with the applicable sign posting rules. North San Gabriel Alliance stated that a local resident who regularly drives past the site never observed the signs posted at the proposed site casting serious doubt on whether the signs were in place for the required time period. In addition, North San Gabriel Alliance expressed doubt that the Applicant's signs complied with the requirements in 30 TAC § 101.601 requiring the public notice to indicate that the application is being processed in an expedited manner.

North San Gabriel Alliance stated that TCEQ's sign posting instructions require applicants to notify the TCEQ of any errors or omissions and to request approval for any necessary changes. In this regard, North San Gabriel Alliance stated that 30 TAC § 101.602 requires that the public notice for expedited applications indicate that the application is being processed in an expedited manner and that given this requirement, the Applicant should have requested changes to the text of the signs. North San Gabriel Alliance stated that the potential failure to comply with the sign posting requirements resulted in harm to local residents because not receiving notice of the application resulted in them not submitting timely requests for a contested case hearing.

RESPONSE 3: When it is determined that public notice is required for air quality applications, applicants must ensure that signs regarding the requested permit action are posted as required by 30 TAC § 39.604 (Sign-Posting). The sign(s) must declare the filing of an application for a permit and state the manner in which the commission may be contacted for further information. The signs must consist of dark lettering on a white background and must be no smaller than 18 inches by 28 inches and all lettering must be no less than 1½ inches in size and block printed capital lettering. In addition, 30 TAC § 39.604 requires that each sign placed at the site be located within ten feet of every property line paralleling a public highway, street, or road. Signs must also be visible from the street and spaced at not more than 1,500-foot intervals. A minimum of one sign, but no more than three signs, are required along any property line paralleling a public highway, street, or road. In cases where notice is required to be published in an alternative language, applicants must also post signs in the applicable alternative language. Additionally, the applicant must provide written verification to the commission that the sign-posting was conducted in accordance with TCEQ rules.

30 TAC § 101.602 provides that when existing public notice requirements must be met and the applicant pays the expedited permitting surcharge, the applicable public notice must indicate that the application is being processed in an expedited manner. The term "public notice" in this rule refers to the newspaper publications discussed in Response 1. These notices (both first and second notice) contained the language required by section 101.602 indicating that the application was being processed in an expedited manner. However, the signs required to be posted by 30 TAC § 39.604, are not required to contain similar language.

The Applicant provided the required verification to the Office of the Chief Clerk verifying that signs were posted at the proposed site in accordance with the TCEQ rules. In addition, at the request of the Executive Director's staff, the Applicant also provided photos containing EXIF data which demonstrated that the signs were posted on the dates and at the location required by the TCEQ rules.

COMMENT 4: Air Quality Permit

Elizabeth Ann Friou questioned why the Applicant needs a permit if the emissions are not toxic or dangerous.

RESPONSE 4: The TCAA § 382.0518 provides that before work begins on the construction of a new facility or a modification of an existing facility that may emit air contaminants, the person planning the construction or modification must obtain a permit or permit amendment from the commission. Air contaminant is defined in the TCAA § 382.003(2), to include "particulate matter, radioactive material, dust fumes, gas, mist, smoke, vapor, or odor, including any combination of those items, produced by processes other than natural." Because the proposed facility will emit air contaminants, a permit must be obtained prior to the start of construction.

COMMENT 5: Air Quality / Health Effects

Commenters expressed concern about the effect of the emissions from the proposed project on the air quality and health of people, particularly sensitive populations such as the elderly, children, and people with existing medical conditions. North San Gabriel Alliance expressed concern that the application failed to show that the facility would not negatively impact air quality, human health, the environment, or property in the vicinity of the site. Commenters express specific concern regarding emissions of hydrogen fluoride (HF) and fluorine. Commenters expressed concern that the proposed project would cause negative health effects, including cancer. Group C commented that hydrogen fluoride is an extremely dangerous chemical that eats skin and lung tissue and stated that this chemical should never be released into the air. Heather Pacheco stated that the area does not have buildings or structures to block wind and expressed concern that the wind would carry toxic chemicals that would subsequently impact the community.

North San Gabriel Alliance expressed concern that the application failed to show that the facility would not negatively impact air quality, human health, the environment, or property in the vicinity of the site. North San Gabriel Alliance also expressed concern that the application did not consider the potential for cumulative impacts and that it

was not demonstrated that the TCEQ applied ESLs. Specifically, North San Gabriel Alliance stated that the "ESL thresholds" indicate that nearby residences will be impacted. Heather Pacheco expressed concern that winds would carry toxic chemicals to the surrounding area. Stephanie Ryder Morris commented that the TCEQ's standards are not strict enough.

Several commenters expressed concern about polyfluoroalkyl substances (PFAS) and stated these are known as "forever chemicals" because they do not degrade in nature. Bryce P. McCormick commented that perfluorooctanoic acid, which he stated is listed on the product information page of the Applicant's website, was recently identified in an EPA health advisory as a PFAS chemical. Jennifer Spies expressed concern regarding the potential health impacts of PFAS chemicals in the air and asked to what standards the Applicant is being held for these contaminants and how those standards were developed. Ms. Spies expressed concern about the potential for PFAS discharges into nearby water bodies and commented that PFAS could be spread up to 25 miles away and questioned whether the model accounted for impacts more than a few miles from the plant. Ms. Spies also questioned whether the model would be re-evaluated if EPA began regulating PFAS chemicals. In addition, Ms. Spies questioned whether the Applicant would control and monitor for these compounds and what specific method would be used for monitoring.

(County Commissioner Cynthia P. Long, North San Gabriel Alliance, Group A, Group C, Maude Allen, Mark Baker, Kristyn Barry, Stephen Bauer, Stephen David Bauer, Danial Beesley, Don T. Berry, Joy Borjes, Twila Bowden, Richard Arthur Box, Conor Brace, Whitney Brace, Lindsey Brassfield, Ashley Brooks, Alex Campo, Susan G. Carlson, Robert Carwell, Monica Castro, Megan Varvir Coe, C. D. Cook, Erin Debarbieri, Cristin L. Dershem, Jennifer Eyre, Tyler Andrew Eyre, Dylan Michael Foley, Susanne Fratzke, Elizabeth Ann Friou, Jillian Gabriel, Shannon Gehrler, Richard Grabish, Charles Gross, Joanna R. Hayes, Kelley Heath, Brenda Hendrickson, Ed Hillis, Liz Howells, Luann Howland, Andrea Jagodzinski, Shawn Jagodzinski, Matthew Johnson, Suzanne Johnson, Catherine Johnston, Chris Kalinowski, Molly Kalinowski, Lars Kuslich, Katrina D. Leal, Jan Love, Babu Madala, Nelson Mak, Alycen Malone, John Martin, Sherri Martin, Linda Martinez, Mary Massey, Bryce P. McCormick, Charles McCormick, Timothy McDaniel, Andres Mendez, Noor Agha Mendez, Jannah Mersiovsky, Karen Milone, Kenneth Mohr, Stephanie Ryder Morris, Casy Nash, Cindy Nash, Nick Novo, Sarah Novo, Abby Ogletree, Brittney Ortiz, Joe Owen, Heather Pacheco, Emily Patterson, Carla Picinich, Corrina Pointer, Bryan primrose, Jackie Primrose, Bessie Rhodes, James Richardson, Erika Rix, Randal Robbins, Whitney Robbins, Chris Robion, Maria Yolanda Rocke, Mark Rocke, Bill Shier, Mark Shifrin, Robert Smith, Jennifer Spies, Heather Stonehill, Heather Stonehill-Garcia, Calvin Tait, Sandra Lee Thurman, Tim Thrash, Suze Treacy, Larry Tucker, Teresa Tucker, Paul Keith Turner, Brittany D. Varner, Laura S. Wallace, Frankie Waller, Peggy Wardlaw, Susan M. Warhol, Jason Watkins, Nikki Watkins, Scott Weisse, Charles Gregory Wempe, Shannon White-Shubert, Keith Wilcox, Charles William)

RESPONSE 5: The Executive Director is required to review permit applications to ensure the emissions proposed to be authorized will be protective of human health and the environment. For this type of air permit application, potential impacts to

human health and welfare or the environment are determined by comparing the predicted concentration of air contaminants to appropriate state and federal standards and guidelines. These standards and guidelines include the National Ambient Air Quality Standards (NAAQS), TCEQ Effects Screening Levels (ESLs), and TCEQ rules. The Applicant proposed to authorize a new specialty manufacturing facility that will produce a variety of perfluorocarbons. The permit will authorize emissions of CO, NO_x, PM₁₀, PM_{2.5}, organic compounds, hydrogen fluorides, and hazardous air pollutants. As described in detail below, the Executive Director determined that the emissions authorized by this permit will be protective of both human health and welfare and the environment.

NAAQS Analysis

The U.S. Environmental Protection Agency (EPA) created and continues to evaluate the NAAQS, which include both primary and secondary standards, for pollutants considered harmful to public health and the environment.¹ Primary standards protect public health, including sensitive members of the population such as children, the elderly, and those individuals with preexisting health conditions. Secondary NAAQS protect public welfare and the environment, including animals, crops, vegetation, visibility, and buildings, from any known or anticipated adverse effects from air contaminants. The EPA has set NAAQS for criteria pollutants, which include carbon monoxide (CO), lead (Pb), nitrogen dioxide (NO₂), ozone (O₃), sulfur dioxide (SO₂), particulate matter less than or equal to 10 microns in aerodynamic diameter (PM₁₀), and PM less than or equal to 2.5 microns in aerodynamic diameter (PM_{2.5}).

The likelihood of whether adverse health effects caused by emissions from the facility could occur in members of the general public, including sensitive subgroups such as children, the elderly, or people with existing respiratory conditions, was determined by comparing the facility's maximum predicted air dispersion modeling concentrations to the relevant state and federal standards and ESLs. TCEQ staff used modeling results to verify that predicted ground-level concentrations from the proposed facility are not likely to adversely impact public health and welfare. The overall evaluation process provides a conservative prediction that is protective of public health. The modeling predictions were reviewed by the TCEQ Air Dispersion Modeling Team, and the modeling analysis was determined to be acceptable. The Applicant used the AERMOD modeling system to provide a reasonable worst-case representation of potential impacts from the proposed emissions on the area surrounding the facility. See Response 7 for additional information concerning the modeling and Response 13 concerning emissions calculations.

The Applicant conducted a NAAQS analysis for CO, NO₂, PM₁₀, and PM_{2.5}. The first step of the NAAQS analysis is to compare the maximum predicted concentrations against the established de minimis level. Maximum predicted concentrations (GLCmax²) below the de minimis level are considered to be so low that they do not require further NAAQS analysis. Table 1 contains the results of the de minimis analysis.

¹ 40 C.F.R. § 50.2

² The GLCmax is the maximum ground level concentration predicted by the modeling.

Table 1. Modeling Results for De Minimis Review

Pollutant	Averaging Time	GLCmax ($\mu\text{g}/\text{m}^3$)	De Minimis ($\mu\text{g}/\text{m}^3$)
NO ₂	1-hr	7	7.5
NO ₂	Annual	0.1	1
CO	1-hr	10	2000
CO	8-hr	3	500
PM ₁₀	24-hr	0.1	5
PM _{2.5}	24-hr	0.1	1.2
PM _{2.5}	Annual	0.01	0.2

The NAAQS analysis results demonstrated that each criteria pollutant proposed to be authorized is below the de minimis level for each pollutant, should not cause or contribute to violation of the NAAQS, and will be protective of human health and the environment.

Health Effects Analysis

To evaluate potential impacts of non-criteria pollutants, a health effects analysis was performed. ESLs are specific guideline concentrations used in TCEQ's evaluation of certain non-criteria pollutants. These guidelines are derived by the TCEQ's Toxicology Division and are based on a pollutant's potential to cause adverse health effects, odor nuisances, and effects on vegetation. Health-based ESLs are set below levels reported to produce adverse health effects and are set to protect the general public, including sensitive subgroups such as children, the elderly, or people with existing respiratory conditions. The TCEQ's Toxicology Division specifically considers the possibility of cumulative and aggregate exposure when developing the ESL values that are used in air permitting, creating an additional margin of safety that accounts for potential cumulative and aggregate impacts. Adverse health or welfare effects are not expected to occur if the air concentration of a pollutant is below its respective ESL. If an air concentration of a pollutant is above the screening level, it is not necessarily indicative that an adverse effect will occur, but rather that further evaluation is warranted.

The health effects analysis is performed using the TCEQ guidance Air Permit Reviewer Reference Guide - APDG 5874 - Modeling and Effects Review Applicability (MERA)³ process. The MERA provides a step-by-step process to evaluate the potential impacts of non-criteria pollutants which are evaluated against the ESL for each chemical species. The initial steps are simple and conservative, and as the review progresses through the process, the steps require more detail and result in a more refined analysis. If a contaminant meets the criteria of a step, the review of human health and welfare effects for that chemical species is complete and is said to "fall out" of the MERA process at that step because it is protective of human health and welfare. The results of the health effects analysis are included in Table 2 below.

³ See Air Permit Reviewer Reference Guide - APDG 5874 guidance document.

Table 2. Minor Site-Wide Health Effects Modeling Results

Pollutant	CAS#	Averaging Time	GLCmax (µg/m ³)	ESL (µg/m ³)
hydrogen fluoride	7664-39-3	1-hr	6	18
hydrogen fluoride For air permit reviews in agricultural areas	7664-39-3	1-hr	3.9	3
hydrogen fluoride For air permit reviews in agricultural areas with cattle	7664-39-3	Annual	0.3	0.75
fluorine	7782-41-4	1-hr	3.9	2
perfluoroheptane	335-57-9	1-hr	22	20000
methanol	67-56-1	1-hr	38	3900
perfluorooctanoic acid and its inorganic salts	335-67-1	1-hr	<0.01	0.05
bromine	7726-95-6	1-hr	5	7
hydrogen chloride	7647-01-0	1-hr	4	190
hydrogen chloride	7647-01-0	Annual	0.1	7.9
carbon tetrafluoride	75-73-0	1-hr	154	18000
Perfluoro (bis-2-chloroethoxy methane)	N/A	1-hr	7	200
Perfluorodecalin	306-94-5	1-hr	22	200
polymers of chlorotrifluoroethylene (PCTFE)	9002-83-9	1-hr	17	50
carbonyl fluoride For air permit reviews in agricultural areas with cattle	353-50-4	Annual	0.03	0.71
trifluoroacetic acid For air permit reviews in agricultural areas with cattle	76-05-1	Annual	0.03	0.71

As demonstrated in Table 2, with the exception of hydrogen fluoride and fluorine, all non-criteria pollutants proposed to be authorized were below their respective ESLs. Thus, these pollutants satisfied the MERA criteria and would not be expected to cause adverse health effects. As described above, if an air concentration of a pollutant is above the ESL, it is not indicative of an adverse effect but rather that further evaluation is warranted. The TCEQ's Toxicology Division conducted an analysis of hydrogen fluoride and fluorine, in order to evaluate potential exposures and assess human health risks to the public. The Toxicology Division determined that the potential

impacts are acceptable given the conservative nature of both the ESLs and the emissions estimates.

In summary, the air contaminants proposed to be authorized in this permit application were evaluated in accordance with applicable federal and state rules and regulations. It was determined that, based on the potential predicted concentrations reviewed by the Executive Director's staff, adverse short- or long-term health effects for the general public, including sensitive subgroups such as children, the elderly, or those individuals with preexisting health conditions, animal life, crops, and vegetation are not expected as a result of exposure to the proposed emissions.

COMMENT 6: Environmental Concerns/ Flora and Fauna/ Endangered Species

Commenters expressed concern about the effect of the proposed project on flora, fauna and the surrounding environment, including the impacts on soil, trees, farmlands, and animals, including livestock and pets. Shannon White-Shubert commented that the area has unique fertile soil. North San Gabriel Alliance stated that the application failed to show that the proposed facility will not negatively affect plants and animals, including livestock and wildlife, and the local environment in the vicinity of the site. North San Gabriel Alliance also expressed concern that the application did not provide information about nearby livestock or their forage grasses and stated that the application should be returned for evaluation of the correct information. In addition, North San Gabriel Alliance also expressed concern that the area contains limestone features on other properties that could serve as habitat for endangered species and commented that the site should be analyzed for the presence of threatened or endangered species.

(North San Gabriel Alliance, Group A, Group C, Group D, Maude Allen, Federico I. Arce, Mark Baker, Tami Baker, Kristyn Barry, Franchesca C. Estrada Danial Beesley, Joy Borjes, Twila Bowden, Alex Campo, Susan G. Carlson, Robert Carwell, Monica Castro, Karen Cross, Jennifer Eyre, Tyler Andrew Eyre, Sheryl Marie Farley, Anthony Figgins, Amanda Foster, Elizabeth Ann Friou, Jillian Gabriel, Shannon Gehrler, Richard Grabish, Joanna R. Hayes, Liz Howells, Shawn Jagodzinski, Matthew Johnson, Suzanne Johnson, Chris Kalinowski, Molly Kalinowski, Lars Kuslich, Timothy McDaniel Katrina D. Leal, Babu Madala, Nelson Mak, Alycen Malone, Linda Martinez, Bryce P. McCormick, Charles McCormick, Andres Mendez, Noor Agha Mendez, Stephanie Ryder Morris, Nick Novo, Sarah Novo, Brittney Ortiz, Joe Owen, Rebecca R. Owens, Heather Pacheco, Corrina Pointer, Bryan Primrose, Jackie Primrose, Travis Redding, Bessie Rhodes, James Richardson, Erika Rix, Twila Bowden Randal Robbins, Chris Robion, Maria Yolanda Rocke, Mark Rocke, Robert Smith, Calvin Tait, Tim Thrash, Laura S. Wallace, Nikki Watkins, Charles Gregory Wempe, Shannon White-Shubert, Keith Wilcox, Elizabeth Williams, Haziell Williams)

RESPONSE 6: As described above, the secondary NAAQS are those the EPA Administrator determines are necessary to protect public welfare and the environment, including animals, crops, vegetation, visibility, and structures, from any known or anticipated adverse effects associated with the presence of a contaminant in the ambient air. The TCEQ's jurisdiction for air quality permitting does not authorize the

commission to consider effects on plants or animals outside of an evaluation of the secondary NAAQS. Accordingly, applicants for air quality permits are not required to submit information concerning nearby livestock or forage grasses. However, because the emissions from this facility should not cause an exceedance of the NAAQS, the emissions are not expected to adversely impact land, livestock, wildlife, crops, or visibility, nor should emissions interfere with the use and enjoyment of surrounding land or water. In addition, the ESLs for hydrogen fluoride, carbonyl fluoride, and trifluoroacetic acid were developed specifically to be protective of cattle in addition to human health. Permit holders must also comply with 30 TAC § 101.4, which prohibits the discharge of contaminants which may be injurious to, or adversely affect, animal life.

Compliance with rules and regulations regarding endangered species is handled at the state level by the Texas Parks and Wildlife Department and at the federal level by the United States Fish and Wildlife Service. It is incumbent upon an applicant to request and acquire any additional authorizations that may be required under state or federal law. However, if operated in accordance with the requirements of this permit, adverse impacts from the proposed facility are not expected.

COMMENT 7: Air Dispersion Modeling / Evaluation of the Surrounding Area

Commenters expressed concern that the review of the application did not adequately consider potential impacts on the surrounding area or nearby residences. North San Gabriel Alliance stated that the application did not demonstrate that an adequate site review was conducted for the property. In addition, North San Gabriel Alliance stated it was not clear that the air modeling included and properly evaluated all applicable emissions, such as fugitive emissions or MSS activities. North San Gabriel Alliance expressed concern that several nearby residents were not identified in the application and stated that the ESLs indicated that those residents would be impacted. North San Gabriel Alliance commented that the application should be returned so that correct information can be submitted and potential impacts on residences not identified in the application can be evaluated. David Wheelock commented that in the files he found on TCEQ's website, one appears to be a request for information from TCEQ staff asking the Applicant to provide justification for its use of the non-industrial location associated with the analysis. Mr. Wheelock stated that he was not able to find anything in the online records indicating the Applicant responded to this request for information.

North San Gabriel Alliance commented that the application contained factually incorrect information about the surrounding area. Specifically, North San Gabriel Alliance stated that the application states that the site is surrounded to the West, North, and South by forested land and possible agricultural land to the East. Conor Brace commented the statement in the application indicating that the proposed location was in the Florence Area or northwest Williamson County was dishonest in its suggestion that the site was in the middle of nowhere. Mr. Brace requested that TCEQ put down outdated maps and explore the area for itself.

(North San Gabriel Alliance, Conor Brace, David Wheelock)

RESPONSE 7: As described above, appropriate site-specific air dispersion modeling was performed for this application. The Applicant used the EPA-approved AERMOD air dispersion modeling program to provide an estimate of the worst-case potential impacts on the area surrounding the proposed facility. The modeling procedures, methodology, predictions, and results were audited by the TCEQ's Air Dispersion Modeling Team (ADMT) and determined to be acceptable. The ADMT review was conducted following the procedures outlined in TCEQ Publication APDG 6232, Air Quality Modeling Guidelines.⁴

The request to justify the use of the non-industrial location chosen for the site-wide difluorine/fluorine analysis was made prior to the Applicant's submittal of the final modeling analysis. The ADMT conducts a preliminary review of the Electronic Modeling Evaluation Workbook to evaluate general proposals for modeling and to give feedback on items which should be addressed in the final modeling evaluation. The Applicant appropriately addressed this issue in its final modeling submittal and correctly accounted for the non-industrial location of the proposed facility.

The evaluation incorporated all emissions proposed to be authorized as represented in the permit application. The modeling considered the potential effects of buildings (or lack thereof) on the dispersion of emissions. In addition, the model incorporated a full year of meteorological data as a means of predicting dispersion given the different weather patterns expected at the site. While daily weather conditions can vary within a given year, the worst-case meteorological conditions that occur during a given year are typically the same as other years. Thus, the meteorological data included sufficient data to capture the worst-case meteorological conditions, which would include the local prevailing winds.

Applicants are required to provide a current area map and plot plan with their application materials. The area map must include a true north arrow, an accurate graduated scale, show the entire plant property, the location of the property relative to prominent geographical features, and a 3,000-foot radius from the property boundary. The plot plan must clearly show a scale, contain a north arrow, all property lines, emission points, buildings, tanks, process vessels, other process equipment, and include two benchmark locations. The area map and plot plan submitted with the application were sufficiently detailed and representative of the surrounding area for the impact analysis. In addition, the ADMT reviewed aerial photography (Google Earth) to verify the representation of the surrounding area in the area map.

In addition, in its modeling analysis, the Applicant placed receptors around the property line at 25-meter intervals and extending out 150-250 meters in each direction. The receptor grid was then extended out to a distance of 1000-1500 meters in each direction with receptor spacing of 100 meters. The ADMT determined that the grid modeled was sufficient in density and spatial coverage to capture representative maximum ground-level concentrations. As stated in Response 5, based on the Executive Director's staff review, adverse health effects are not expected as a result of proposed emission rates associated with this project.

⁴ See Air Quality Modeling Guidelines - APDG 6232

COMMENT 8: Environmental Impact Study

Shannon White-Shubert commented that the Applicant indicated in a town-hall meeting that it had conducted an environmental study. Ms. White-Shubert expressed concern that this study has not been disclosed to the public.

RESPONSE 8: Environmental Assessments and Environmental Impact Statements (EIS) are a specific requirement for federal agencies under the National Environmental Policy Act (NEPA). An EIS is not required for state actions such as this permit. Thus, the TCEQ cannot require an applicant to submit an EIS or make it available to the public. However, both the TCAA and the TCEQ rules provide for an extensive review of the application to ensure that emissions from the proposed facility will not violate the NAAQS and will not be expected to adversely affect human health or the environment. This review is discussed in more detail in Response 5.

COMMENT 9: Odors

North San Gabriel Alliance expressed concern that its members would be endangered by foul odors from the proposed facility.

RESPONSE 9: The potential for odor nuisance is reviewed through the use of ESLs. In this case, the particular ESLs considered in the review were health-based ESLs which are generally more restrictive than odor-based ESLs. As discussed in Response 5, the health effects review compared the emissions proposed to be authorized to the ESLs and determined that the impacts were acceptable.

While nuisance conditions are not expected if the facility is operated in compliance with the terms of the permit, operators must also comply with 30 TAC § 101.4, which prohibits a person from creating or maintaining a condition of nuisance. Specifically, the rules states "[n]o person shall discharge from any source whatsoever one or more air contaminants or combinations thereof, in such concentration and of such duration as are or may tend to be injurious to or to adversely affect human health or welfare, animal life, vegetation, or property, or as to interfere with the normal use and enjoyment of animal life, vegetation, or property."

Individuals are encouraged to report any concerns about suspected noncompliance with the terms of any permit or other environmental regulation by contacting the TCEQ Austin Regional Office at 512-339-2929 or by calling the 24-hour toll-free Environmental Complaints Hotline at 1-888-777-3186. The TCEQ reviews all complaints received. If the facility is found to be out of compliance with the terms and conditions of the permit, it may be subject to investigation and possible enforcement action.

COMMENT 10: Water Concerns

Commenters expressed concern that the project would negatively impact water resources in the surrounding area, including the Edwards Aquifer. Commenters expressed concern regarding water contamination due to potential spills, byproducts, and discharges from the facility. In addition, many commenters expressed concern that the Applicant would discharge contaminants or chemical waste into the North

Fork San Gabriel River. North San Gabriel Alliance commented that the Applicant was not able to obtain an Edwards Aquifer contributing zone permit and that the Air Permits Division should consider the lack of the contributing zone permit in its review of the air application. Cynthia P. Long expressed concern that the facility will overtax the water supply. John Martin asked what the projected water usage is for the facility and what limits on water usage will be imposed.

(County Commissioner Cynthia P. Long, North San Gabriel Alliance, Group A, Group C, Federico I. Arce, Mark Baker, Kristyn Barry, Stephen David Bauer, Danial Beesley, Don T. Berry, Anne Kathrine Beville, Joy Borjes, Barry L. Bowden, Arthur Richard Box, Richard Arthur Box, Conor Brace, Lindsey Brassfield, Ashley Brooks, Susan G. Carlson, Robert Carwell, Monica Castro, C. D. Cook, Grant Cross, Karen Cross, Paul Davidson, Cristin L. Dershem, Franchesca C. Estrada, Jennifer Eyre, Tyler Andrew Eyre, Sheryl Marie Farley, Amanda Foster, Elizabeth Ann Friou, Jillian Gabriel, Twila Bowden Richard Grabish, Charles Gross, Christi Lachelle Gutierrez, Ed Hillis, Luann Howland, Shawn Jagodzinski, Matthew Johnson, Catherine Johnston, Ericka Lamanna, Katrina D. Leal, Nelson Mak, Alycen Malone, John Martin, Mary Massey, Bryce P. McCormick, Timothy McDaniel, Ronal Dalton McCloud, Andres Mendez, Noor Agha Mendez, Allison Metcalfe, Stephanie Ryder Morris, Casy Nash, Cindy Nash, Nick Novo, Sarah Novo, Joe Owen, Rebecca R. Owens, Heather Pacheco, Tanara Patel, Emily Patterson, Carla Picinich, Bryan Primrose, Jackie Primrose, James Richardson, Erika Rix, Randal Robbins, Whitney Robbins, Mark Shifrin, Robert Smith, Jennifer Spies, Heather Stonehill, Calvin Tait, Sandra Lee Thurman, Suze Treacy, Teresa Tucker, Paul Keith Turner, Brittany D. Varner, Laura S. Wallace, Frankie Waller, Peggy Wardlaw, Susan M. Warhol, Jason Watkins, Nikki Watkins, Charles Gregory Wempe, Shannon White-Shubert, Skyler Whittlesey, Keith Wilcox, Haziell Williams)

RESPONSE 10: Although the TCEQ is responsible for the environmental protection of air and water as well as the safe management of waste, this proposed permit will regulate the control and abatement of air emissions only. Therefore, issues regarding water use, water quality, or potential discharges are not within the scope of this review. This permit does not regulate water use or authorize the discharge of pollution into a body of water.

The issuance of an air quality permit does not negate the responsibility of an applicant to apply for any additionally required authorizations before operating a plant. It is the Applicant's responsibility to secure any authorizations necessary for operation of the proposed facility, and accordingly, the Applicant may be required to apply for separate authorizations regulating water use or water quality at the proposed site.

Individuals are encouraged to report environmental concerns, including water quality issues, or suspected noncompliance with the terms of any permit or other environmental regulation by contacting the TCEQ Austin Regional Office at 512-339-2929 or by calling the 24-hour toll-free Environmental Complaints Hotline at 1-888-777-3186. The TCEQ evaluates all complaints received. If the plant is found to be out of compliance with the terms and conditions of the permit, the Applicant may be subject to enforcement action.

COMMENT 11: On-Site Chemical Storage

Peggy Wardlaw questioned how the Applicant would store chemicals on site and questioned whether the Applicant accurately represented the type and location of on-site chemical storage. Specifically, Ms. Wardlaw expressed concern that the Applicant indicated it would move chemicals onsite and that process had not been considered during the review of the application. Jackie Primrose asked if there will be limitations on the quantities of each chemical that is on the property at one time so that if there is an accident or natural disaster there is an attempt to minimize the impact.

(Jackie Primrose, Peggy Wardlaw)

RESPONSE 11: The Applicant represented that there will be multiple buildings, including a storage building, that will contain materials stored in sealed drums. The storage of chemicals in sealed containers which do not have the potential to emit pollutants into the air are outside of the jurisdiction of the air permit.

The Applicant submitted a Table 2 Material Balance. The Material Balance representation accounts for all materials entering and leaving the facility at maximum operating conditions. In accordance with 30 TAC § 116.116, an applicant is bound by its representations in the application and those representations become an enforceable part of the permit. See Response 22 concerning emissions events, spills, and emergency response.

COMMENT 12: Best Available Control Technology (BACT)

North San Gabriel Alliance expressed concern that the application did not include an adequate BACT analysis. North San Gabriel Alliance expressed specific concern that the Applicant had withdrawn its application for an Edward Aquifer Contributing Zone Plan because it could not meet applicable requirements and stated this demonstrates the application did not propose BACT. Susanne Fratzke asked if the Applicant would consider installing controls beyond BACT. (North San Gabriel Alliance, Susanne Fratzke)

RESPONSE 12: The TCAA and TCEQ rules require an evaluation of air quality permit applications to determine whether adverse effects to public health, general welfare, or physical property are expected to result from a facility's proposed emissions. As part of the evaluation of applications for new or amended permits, the permit reviewer audits all sources of air contaminants at the proposed facility and assures that the facility will be using the best available control technology (BACT) applicable for the sources and types of contaminants emitted. BACT is based upon control measures that are designed to minimize the level of emissions from specific sources at a facility. Applying BACT results in requiring technology that best controls air emissions with consideration given to the technical practicability and economic reasonableness of reducing or eliminating emissions. See TCAA § 382.0518; 30 TAC § 116.111. BACT may be numerical limitations, the use of an add-on control technology, design considerations, the implementation of work practices, or operational limitations. The Applicant represented that BACT will be used for the proposed new sources.

The contaminants authorized by this permitting action include hydrogen fluorides,

carbon monoxide, hazardous air pollutants, particulate matter, nitrogen oxides and organic compounds. The primary control measures applied to this facility are the use of thermal oxidizers, which will be required to achieve a 99.9 percent destruction efficiency. Absorbers will also be used upstream of the thermal oxidizers to reduce the amount of emissions vented to the thermal oxidizers and to recycle material back to the process. The Applicant also proposed the use of the 28AVO program for monitoring of components in hydrogen fluoride (HF) service. The permit reviewer evaluated the proposed BACT and confirmed it to be acceptable.

COMMENT 13: Emissions Calculations

North San Gabriel Alliance commented that the application did not demonstrate that the emissions calculations were conducted properly. North San Gabriel Alliance also stated that it was not clear whether the emission factors relied on were proper or if the data was representative of site-specific conditions. North San Gabriel Alliance also stated it was not clear whether the emissions calculations included MSS activities.

RESPONSE 13: The Applicant represented the appropriate methodologies to control and minimize emissions and utilized corresponding control efficiencies when calculating the emission rates. As provided in 30 TAC § 116.116(a), the Applicant is bound by these representations, including the represented performance characteristics of the control equipment. In addition, the permit holder must operate within the limits of the permit, including the emission limits as listed in the Maximum Allowable Emissions Rate Table (MAERT).

Emissions calculations for the proposed facility were determined utilizing vendor data, TCEQ guidance, and EPA emissions factors. The EPA has documented a list of emission factors that can be used to calculate the estimated emissions from many sources, including sources proposed to be authorized in this permit. These emission factors are provided in EPA's AP-42 Compilation of Air Emission Factors (AP-42) guidance. The TCEQ ensures the conservative nature of these calculations by evaluating each emission point at the maximum production rates. The resulting emission rates are used as one of the inputs to an EPA-approved air dispersion modeling program that determines the predicted emission concentration for each air contaminant at locations surrounding the proposed facility.

The emission rates from the exhaust gas vent systems were estimated based on vendor supplied data for the air contaminant removal efficiency of the thermal oxidizers, AP-42 emission factors, and calculated air contaminant input rates to the thermal oxidizers. The removal efficiency of the process scrubber was conservatively assumed to be zero. Emission rates from units that are not vented to the exhaust gas vent systems were estimated based on the physical properties of the chemicals and facility operating parameters. Fugitive emission rate estimates were calculated using TCEQ's common fugitive calculation workbook, in accordance with the TCEQ's Air Permit Technical Guidance for Chemical Sources: Fugitive Guidance - APDG 6422 (June 2018). The fugitive emission stream weight percentages authorized in the permit represent the maximum expected concentrations of each chemical under any operation condition.

COMMENT 14: Chemical Flexibility

North San Gabriel Alliance commented that the draft permit should not allow chemical flexibility.

RESPONSE 14: The TCEQ offers regulated entities chemical flexibility by including a set of conditions that contain a procedure for the permit holder to authorize new chemicals. This method is limited to new chemicals that serve the same basic function as the chemicals previously authorized by the permit and that will emit only from currently authorized and previously reviewed emissions points. Unit impact multipliers obtained from the impacts evaluation are identified in the chemical flexibility conditions and the permit holder must use the evaluation procedure outlined in the conditions to determine whether both the short- and long-term impacts are acceptable. The new chemical may be authorized only if it meets the requirements of the chemical flexibility conditions.

COMMENT 15: Hours of Operation

North San Gabriel Alliance expressed concern that the application authorizes the site to operate 24 hours per day, 365 days per year, further stating that this schedule is not protective of public health or the environment.

RESPONSE 15: TCEQ has not been delegated the authority to regulate the hours of operations of a facility or site if the permit review demonstrates all applicable federal and state regulations are met. Accordingly, TCEQ cannot limit the hours of operation unless an emission rate is dependent on a limit on operational hours or there are issues associated with the air quality analysis that require the limitation. The Applicant represented operations up to 8,760 hours per year. Despite the representation of 8,760 hours per year, which is typically done for conservatism and flexibility in operations, facilities typically do not operate that many hours per year. As described in Response 5, based on the Executive Director's staff review, it is not expected that existing health conditions will worsen, or that there will be adverse health effects on the general public, sensitive subgroups, or the public welfare and the environment as a result of the emissions proposed to be authorized.

COMMENT 16: Monitoring and Recordkeeping

Commenters expressed concern about the monitoring requirements contained in the draft permit. Susanne Fratzke questioned how the Applicant would demonstrate compliance with the permit. Janet Ellis questioned what the air quality and groundwater reporting requirements are for this facility. North San Gabriel Alliance expressed concern that the monitoring and recordkeeping requirements in the draft permit will not ensure compliance with all rules and requirements. Charles McCormick commented that the Applicant should be required to install an exhaust monitoring system that measures and records emissions in real time and that the results should be available to the public on the internet. Mr. McCormick stated that the monitoring system should include threshold alarms that trigger sirens and alert emergency services and expressed concern that without this system, local residents will be unable to promptly recognize emergency conditions and know when to evacuate.

(North San Gabriel Alliance, Janet Ellis, Susanne Fratzke, Charles McCormick)

RESPONSE 16: Special conditions have been included as part of the draft permit to ensure the Applicant can demonstrate compliance with the emission limitations set forth in the permit. Emissions from the thermal oxidizer and scrubber system, will be required to be monitored through temperature monitoring of the thermal oxidizer firebox exhaust temperature and the oxygen concentration. The fugitive emissions from components in hydrogen fluoride service will be monitored with the 28AVO program. The permit holder is also required to maintain records to demonstrate compliance, including the monitoring listed above. Records must be made available upon request to representatives of the TCEQ, EPA, or any local air pollution control program having jurisdiction. The Regional Office may perform investigations of the facility which may include an inspection of the site including all equipment, control devices, monitors, and a review of all calculations and required recordkeeping.

In addition, the draft permit requires the Applicant to perform stack sampling and other testing as required to establish the actual pattern and quantities of air contaminants being emitted into the atmosphere from the thermal oxidizers to demonstrate compliance with the permit. This sampling must be conducted in accordance with the appropriate procedures contained in the TCEQ Sampling Procedures Manual and the U.S. Environmental Protection Agency (EPA) Reference Methods and must be conducted within 60 days after achieving the maximum operating rate, but no later than 180 days after initial start-up of the facilities.

COMMENT 17: Future Permitting Actions

Susanne Fratzke commented that the application is based on a certain business case and questioned what would happen if the Applicant's business expanded in the future. Ms. Fratzke commented that an expanding business would likely mean more pollution and questioned whether a new air permit would be required.

RESPONSE 17: A permit holder may not vary from any representation or permit condition without obtaining a permit amendment if the change will cause a change in the method of control of emissions, a change in the character of the emissions, or an increase in the emissions rate of any air contaminant. *See* 30 TAC § 116.116(b). The Executive Director cannot speculate on the need for any future amendments. However, each application received by the agency is reviewed for compliance with applicable rules and regulations and any future applications would need to demonstrate that the proposed facility would utilize the best available control technology (BACT) and that the proposed emissions would not cause or contribute to a violation of the NAAQS or adverse health effects.

COMMENT 18: Location / Trucks / Traffic / Roads / Quality of Life / Aesthetics / Property Value

Location

Commenters expressed concern regarding the location of the proposed facility and its proximity to residential and public areas, including farms, ranches, agricultural areas,

wildlife conservations areas, and water recreation areas. Some commenters also expressed concern that the proposed facility would be located in the Edwards Aquifer contributing zone and several commenters requested that the proposed facility be located somewhere else. Robert Carwell questioned how a governmental body would see fit to enable the construction of a chemical facility in this area. Brittany D. Varner stated the Applicant cheated the system by purchasing land in a residential area and stated that there is no telling who will be next to build in the area. Charles Gross expressed concern that the proposed facility would negatively impact the future development of the area. Luann Howland and Maude Allen expressed concern that the facility's proposed location is in a 100-year flood plain. North San Gabriel Alliance commented that the Applicant withdrew its application for an Edwards Aquifer Contributing Zone Plan which demonstrates that the area is subject to heightened protections and is not suitable for the proposed facility.

In addition, some commenters expressed concern that the Applicant chose the proposed location specifically to avoid regulatory oversight. Bryce McCormick commented that the Applicant is moving to the community so they can operate freely. Peggy Wardlaw commented that the Applicant chose the location so that people would not be around to know when chemicals are spilled. Joe Owen commented that a facility like this operates outside of a city's jurisdiction to avoid scrutiny and air quality controls. Heather Stonehill-Garcia also expressed concern that the Applicant chose the proposed location to avoid peering eyes and avoid getting caught in the event that their facility leaks.

(County Commissioner Cynthia P. Long, North San Gabriel Alliance, Group A, Group C, Group D, Maude Allen, Federico I. Arce, Mark Baker, Tami Baker, Kristyn Barry, Stephen David Bauer, Danial Beesley, Don T. Berry, Joy Borjes, Richard Arthur Box, Conor Brace, Whitney Brace, Lindsey Brassfield, Ashley Brooks, Robert Carwell, Monica Castro, Megan Varvir Coe, C. D. Cook, Tim Cox, Grant Cross, Karen Cross, Paul Davidson, Erin Debarbieri, Cristin L. Dershem, Franchesca C. Estrada, Jennifer Eyre, Tyler Andrew Eyre, Shery Marie Farley, Sheryl Marie Farley, Anthony Figgins, Jennifer Finkel, Dylan Michael Foley, Amanda Foster, Elizabeth Ann Friou, Kyle Gehrler, William Patrick George, Richard Grabish, Charles Gross, Christi Lachelle Gutierrez, Joanna R. Hayes, Kelley Heath, Glenn Heimbigner, Glenn Heimbinger, James Henley, Ed Hillis, Luann Howland, Andrea Jagodzinski, Shawn Jagodzinski, Matthew Johnson, Suzanne Johnson, Catherine Johnston, Chris Kalinowski, Molly Kalinowski, Ericka Lamanna, Jan Love, Babu Madala, Nelson Mak, Alycen Malone, John Martin, Sherri Martin, Mary Massey, Bryce McCormick, Bryce P. McCormick, Timothy McDaniel, Ronal Dalton Mcloud, Andres Mendez, Noor Agha Mendez, Allison Metcalfe, Karen Milone, Kenneth Mohr, Connie Moore, Stephanie Ryder Morris, Casy Nash, Nick Novo, Sarah Novo, Joe Owen, Rebecca R. Owens, Heather Pacheco, Emily Patterson, Carla Picinich, Corrina Pointer, Bryan Primrose, Jackie Primrose, Travis Redding, Bessie Rhodes, James Richardson, Erika Rix, Whitney Robbins, Mark Rocke, Bill Shier, Mark Shifrin, Ellen Skoviera, Robert Smith, Wanda Smith, Jennifer Spies, Michele Stanfield, Heather Stonehill-Garcia, Calvin Tait, Sandra Lee Thurman, Suze Treacy, Larry Tucker, Teresa Tucker, Brittany D. Varner, Laura S. Wallace, Peggy Wardlaw, Susan M. Warhol, Jason Watkins, Nikki Watkins, Scott Weisse, Charles Gregory Wempe, Charles Wempe, Shannon White-

Shubert, Skyler Whittlesey, Keith Wilcox, Charles William, Elizabeth Williams, Haziell Williams)

Quality of Life / Recreation / Aesthetics / Property Value

Commenters are concerned about the effect of the proposed project on their quality of life, on the aesthetics of the area, and on their property and land values. In addition, several commenters stated they moved to the area for the natural beauty and expressed concern that recreational activities such as swimming, fishing, and hunting would be impacted by the proposed facility.

(North San Gabriel Alliance, Tami Baker, Don T. Berry, Alex Campo, Robert Carwell, Monica Castro, Karen Cross, Sheryl Marie Farley, Elizabeth Ann Friou, Kelley Heath, Brian S. Jalufka, John Martin, Mary Massey, Timothy McDaniel, Karen Milone, Heather Pacheco, Paul Keith Turner, Shannon White-Shubert, Keith Wilcox, Elizabeth Williams, Haziell Williams)

Trucks/Traffic/Roads

Charles Gross commented that road infrastructure is poor in the area. Larry Tucker commented that the existing road is not equipped to handle trucks, further expressing concern regarding the potential for traffic accidents. In addition, Mr. Tucker commented that the TCEQ should consider the potential air quality impacts of a traffic accident. Brittany D. Varner expressed concern about semi-trucks carrying toxic chemicals. (Charles Gross, Larry Tucker, Brittany D. Varner)

RESPONSE 18: The TCAA establishes the TCEQ's jurisdiction to regulate air emission in the state of Texas. TCEQ's review of requests for air quality authorizations to emit air contaminants is limited to a review of the best available control technology (BACT) and a health effects review. Accordingly, the TCEQ does not have jurisdiction to consider plant location choices made by an applicant when determining whether to approve or deny a permit application, unless a statute or rule imposes specific distance limitations that are enforceable by the TCEQ. Zoning, land use, aesthetics, and effects on property values are beyond the authority of the TCEQ for consideration when reviewing air quality permit applications. Although TCEQ cannot consider land use issues, the TCEQ does conduct a health effects review to ensure that there will be no adverse impacts to human health and welfare. *See* Response 5 for additional information about the review of the application.

The TCEQ also does not have jurisdiction to consider traffic or road safety when determining whether to approve or deny a permit application. Trucks are considered mobile sources, which are not regulated by the TCEQ. Moreover, the TCEQ is prohibited from regulating roads per TCAA § 382.003(6), which excludes roads from the definition of "facility." These concerns are typically the responsibility of local, county, or other state agencies, such as the Texas Department of Transportation (TxDot) and the Texas Department of Public Safety (DPS). Concerns regarding roads should be addressed to the appropriate state or local officials. However, emissions from these sources may not constitute a nuisance as defined in 30 TAC § 101.4. Although the TCEQ is prohibited from regulating trucks, TCEQ rules prohibit anyone from causing a traffic hazard. Specifically, 30 TAC § 101.5 states, "No person shall discharge from any source whatsoever such quantities of air contaminants, uncombined water, or other

materials which cause or have a tendency to cause a traffic hazard or an interference with normal road use.”

COMMENT 19: Public Infrastructure and Utilities

Cynthia P. Long and Shannon White-Shubert expressed concern that the public infrastructure and utilities in the area would be unable to support the needs of the proposed facility, stating that public utilities in the rural area are unreliable, power outages are common, and that the area does not have sewer, natural gas or adequate water. (County Commissioner Cynthia P. Long, Charles Gross, Brittany D. Varner, Laura S. Wallace, Shannon White-Shubert)

RESPONSE 19: This permit, if issued, will regulate the control and abatement of air emissions only. Issues related to the public infrastructure or the availability of utilities are outside the scope of review of an air quality permit. It is the Applicant's responsibility to ensure it has adequate resources to operate its facility.

COMMENT 20: Attainment Area/State Implementation Plan

Jennifer Spies commented that the Applicant only chose the proposed location because the area is considered to be in attainment. Ms. Spies stated that if the facility had been proposed in a non-attainment area, EPA would be monitoring it and would require a State Implementation Plan (SIP) to detail steps necessary to achieve the standards.

RESPONSE 20: As described in Response 18, the TCEQ does not have jurisdiction to consider plant location choices made by an applicant and therefore cannot deny a permit application on the basis of location unless a statute or rule imposes specific distance limitations that are enforceable by the TCEQ.

The FCAA requires states to develop State Implementation Plans (SIPs) to address attainment and maintenance of the NAAQS. A SIP is a collection of regulations and documents used by a state, territory, or local air district to implement, maintain, and attain the NAAQS and to fulfill other requirements of the FCAA. The Texas SIP, which is federally enforceable, includes Texas' NSR permitting programs for both major and minor sources, and these programs implement both the FCAA and the TCAA. However, SIPs are not required for individual permitting actions. The EPA has approved the Texas SIP, making the TCEQ the permitting authority for regulation of air emissions generated in the state of Texas.

COMMENT 21: Compliance History / Enforcement / Penalties

Commenters expressed concern regarding the Applicant's compliance history, and specifically about violations at its other facility locations. John Martin asked what the company history is when it comes to responses to leaks and about the history of imposed penalties. Group D commented that this Applicant has had too many negligent discharges at its other location.

Susanne Fratzke questioned whether the TCEQ would audit the company to ensure compliance. Stephanie Ryder Morris expressed concern about TCEQ's ability to enforce environmental standards given cuts to the agency's budget. Andres Mendez expressed

concern that penalties are too low and stated that the Applicant views fines as a cost of doing business and would rather pay fines than comply with their permits.

(Group D, Maude Allen, Danial Beesley, Twila Bowden, Whitney Brace, Ranchesca C. Estrada, Jennifer Eyre, Tyler Andrew Eyre, Susanne Fratzke, Jillian Gabriel, Chelsey Heil, James Henley, Lars Kuslich, Katrina D. Leal, Nelson Mak, John Martin, Bryce McCormick, Andres Mendez, Noor Agha Mendez, Stephanie Ryder Morris, Nick Novo, Sarah Novo, Joe Owen, Rebecca R. Owens, Heather Pacheco, Travis Redding, Erika Rix, Bill Shier, Robert Smith, Heather Stonehill-Garcia, Calvin Tait, Nikki Watkins, Charles Gregory Wempe, Charles Wempe, Elizabeth Williams, Haziell Williams)

RESPONSE 21: There are a number of mechanisms by which the TCEQ monitors compliance with permit conditions and state and federal regulations. To the extent that personnel, time, and resources are available, the TCEQ investigates regulated operations to ensure compliance with applicable rules and regulations. Although specific to each site, investigations generally explore the entire operation of the plant. The investigation schedule may be increased if violations are found, violations are repeated, or if a regulated entity is classified as an unsatisfactory performer.

Individuals are encouraged to report environmental concerns or suspected noncompliance with the terms of any permit or other environmental regulation by contacting the TCEQ Austin Regional Office at 512-339-2929 or by calling the 24-hour toll-free Environmental Complaints Hotline at 1-888-777-3186. The TCEQ evaluates all complaints received. If the facility is found to be out of compliance with the terms and conditions of the permit, the Applicant may be subject to enforcement action. Citizen-collected evidence may be used in such an action. *See* 30 TAC § 70.4, Enforcement Action Using Information Provided by Private Individual, for details on gathering and reporting such evidence. Under the citizen-collected evidence program, individuals can provide information on possible violations of environmental law. The information, if gathered according to agency procedures and guidelines, can be used by the TCEQ to pursue enforcement. In this program, citizens can become involved and may eventually testify at a hearing or trial concerning the violation. For additional information, *see* the TCEQ's website at <https://www.tceq.texas.gov/compliance/complaints/protocols>.

Alleged violations documented during an investigation are initially addressed through a notice of violation (NOV) letter, which generally allows the operator a specified period of time within which to comply. The violation is considered resolved upon timely corrective action. If a violation is not timely corrected, repeated, or causes an impact to the environment or neighboring properties, formal enforcement action will begin according to the TCEQ Enforcement Initiation Criteria. Depending on the situation, the commission has the authority to suspend or revoke a permit pursuant to the limitations in Tex. Water Code, Chapter 7, Subchapter G.

Generally, administrative and civil penalties up to \$10,000 and \$50-25,000 respectively, may be assessed for violations of the TCEQ rules. *See* Tex. Water Code, Chapter 7. However, the specific penalties associated with any violation will be determined on a case-by-case basis according to the TCEQ's Penalty Policy. Any economic benefit or monetary gain derived from a failure to comply with TCEQ rules or regulations will be considered and may increase the penalty. Additional information

about the TCEQ penalty policy may be obtained from the TCEQ website, Penalty Policy of the Texas Commission on Environmental Quality, available at <https://www.tceq.texas.gov/compliance/investigation/rg-253.html>.

In addition, during the technical review of permit applications, a compliance history review of both the company and the site is conducted based on the criteria in 30 TAC Chapter 60. These rules may be found at the following website: <https://www.tceq.texas.gov/rules/index.html>.

The compliance history is reviewed for the five-year period prior to the date the permit application was received and includes multimedia compliance-related components about the site under review. These components include: enforcement orders, consent decrees, court judgments, criminal convictions, chronic excessive emissions events, investigations, notices of violations, audits and violations disclosed under the Audit Act, environmental management systems, voluntary on-site compliance assessments, voluntary pollution reduction programs, and early compliance.

A company and site may have one of the following classifications and ratings:

- High: rating below 0.10 - complies with environmental regulations extremely well;
- Satisfactory: rating 0.10 - 55.00 - generally complies with environmental regulations;
- Unsatisfactory: rating greater than 55.00 - fails to comply with a significant portion of the relevant environmental regulations.

The proposed site has a rating of 'unclassified' because it is a new site. The company has a rating of 3.31 and a classification of Satisfactory. The company rating reflects the average of the ratings for all sites the company owns in Texas.

COMMENT 22: Emissions Events / Spills/ Safety / Emergency Response

Commenters expressed concern regarding the safety of the proposed facility, potential chemical exposures, emissions events, explosions, spills, and remediation of hazards. Commenters expressed concern that there is a lack of nearby emergency services that would respond to a chemical plant release or emergency, including medical, fire, and hazmat responders and services. Whitney Brace expressed concern about the safety of the facility and about the potential of exposure to chemical clouds. Kenneth Mohr expressed concern about safety and stated that fluorine is a volatile and explosive chemical. Haziell Williams commented that remediation is the company's responsibility. Peggy Wardlaw expressed concern about the potential for forest fires. Dylan Michael Foley stated that TCEQ would be held accountable when something goes wrong.

Commenters expressed concern that public utilities are not reliable in the area and that water would not be available to firefighters in the case of a fire or explosion. Shannon White-Shubert commented that there is no fire department nearby and that the nearest is a volunteer fire department. Ms. White-Shubert also expressed concern about the distance from the nearest trauma centers to the proposed facility.

North San Gabriel Alliance expressed concern that the application did not include a Risk Management Plan or seek to authorize emergency fire water pumps onsite. North San Gabriel Alliance commented that the Applicant has a poor history of emergency response at its Round Rock facility and that its emergency and disaster response plan is inadequate. Jennifer Spies asked how and when the public would be notified that a release has occurred. Charles McCormick commented that the requirement to self-report releases of toxic gases is doubtful at best and that the Applicant is incentivized to ignore issues to keep the facility out of the spotlight.

(County Commissioner Cynthia P. Long, North San Gabriel Alliance, Group D, Maude Allen, Don T. Berry, Whitney Brace, Paul Davidson, Jennifer Eyre, Tyler Andrew Eyre, Dylan Michael Foley, Elizabeth Ann Friou, Matthew Johnson, Nelson Mak, Mary Massey, Bryce McCormick, Bryce P. McCormick, Charles McCormick, Andres Mendez, Noor Agha Mendez, Karen Milone, Kenneth Mohr, Nick Novo, Sarah Novo, Joe Owen, Bryan Primrose, Jackie Primrose, James Richardson, Bill Shier, Mark Shifrin, Robert Smith, Jennifer Spies, Sandra Lee Thurman, Brittany D. Varner, Peggy Wardlaw, Susan M. Warhol, Charles Gregory Wempe, Shannon White-Shubert, Keith Wilcox, Elizabeth Williams, Haziel Williams)

RESPONSE 22: The draft permit's Maximum Allowable Emission Rate Table (MAERT) lists the only emissions authorized to be emitted from the proposed plant. The TCEQ defines an upset event as an unplanned or unanticipated occurrence or excursion of a process or operation that results in unauthorized emissions of air contaminants. An upset event that results in unauthorized emissions from an emission point is an emissions event. If an upset occurs, the permit holder must comply with the requirements in 30 TAC § 101.201 regarding the recording and reporting of emission events. If the permit holder fails to report in accordance with 30 TAC § 101.201, the commission may initiate an enforcement action for failing to report the underlying emissions event itself.

In the event of an emergency, the Local Emergency Planning Committee and the regulated entity have the primary responsibility of notifying potentially impacted parties regarding the situation. In addition, As set forth in 30 TAC § 101.201(a), regulated entities are required to notify the TCEQ regional office within 24 hours of the discovery of releases into the air and in advance of maintenance activities that could or have resulted in excess emissions. The TCEQ does not have jurisdiction over local fire prevention or protection and cannot require an applicant to authorize emergency fire water pumps. However, the receipt of an air permit does not negate the responsibility of an applicant to apply for any additional required authorizations prior to operating a plant or from complying with other applicable regulations.

Proposed projects which involve toxic chemicals that are known or suspected to have potential for life threatening effects upon off-facility property in the event of a disaster and involve manufacturing processes that may contribute to the potential for disastrous events may be subject to a disaster review. Specifically, federal rules require owners and operators of a facility that manufactures, uses, stores, or otherwise handles more than a threshold quantity of a regulated substance listed in 40 C.F.R. § 68.130, to implement a risk management program and submit a single Risk

Management Plan for all covered processes to the EPA. TCEQ has not been delegated the authority to administer this program. However, the draft permit requires the permit holder to comply with EPA regulations on Chemical Accident Prevention Provisions promulgated in 40 CFR Part 68. In addition, as part of the technical review of air quality permit applications, the Executive Director questions whether the proposed facility will handle more than a threshold quantity of a regulated substance listed in 40 C.F.R. § 68.130, as part of its disaster review. If a proposed facility is subject to a disaster review, the Executive Director will request that the applicant submit its Risk Management Plan which is then kept on file with the TCEQ. This application triggered a disaster review for hydrogen fluoride (HF) and the draft permit requires the Applicant to submit its Risk Management Plan (RMP) to the Air Permits Division prior to the date the facility first exceeds a threshold quantity of hydrogen fluoride.

COMMENT 23: Corporate Profits / Financial Assurance

Commenters questioned the corporate profits made by this project at a cost to the surrounding community. John Martin asked what financial assurance is in place to reimburse the community if contamination occurs. (Ashley Brooks, John Martin, Bill Shier, Heather Stonehill, Heather Stonehill-Garcia)

RESPONSE 23: The TCEQ does not have jurisdiction to prohibit anyone from seeking authorization to emit air contaminants; nor can the TCEQ prohibit owners and operators from receiving authorization to emit air contaminants if they comply with all statutory and regulatory requirements. The applicable state and federal statutes and rules that govern this air quality permit application do not include provisions requiring financial assurance. Further, the TCEQ is not authorized to consider a company's financial status, profit issues, or third-party contractual agreements in determining whether a permit should be issued.

COMMENT 24: Covenants, Conditions and Restrictions / Deed Restrictions

Commenters expressed concern about the Applicant's compliance with Covenants, Conditions, and Restrictions and Deed Restrictions. Kyle Gehrler stated that restrictions were implemented on all lots that prohibited business from operating on the properties and questioned how the Applicant is able to obtain a permit to operate if this is the case. Suzanne Johnson stated that the Applicant is in violation of deed restrictions and questioned whether permission from the declarant of the property has been given. Shannon White-Shubert expressed similar concerns, commenting that the proposed facility would violate the community deed restrictions which state 'no noxious, noisy, offensive, undesirable, unlawful, or immoral activity shall be conducted on any tract'. Ms. White-Shubert further commented that documents were not filed with Williamson County which establish the property or community as a planned unit development, that the covenants run with the land, and that the deed restrictions will be upheld in a court of law if needed.

(Kyle Gehrler, Suzanne Johnson, Shannon White-Shubert, Brittany D. Varner, Chris Kalinowski, Molly Kalinowski)

RESPONSE 24: The TCEQ does not have jurisdiction to enforce compliance with deed restrictions, including any Covenants, Conditions and Restrictions. However, the issuance of an air quality permit does not negate the obligation of an applicant to ensure it has or will obtain the legal authority necessary to construct its facility in the proposed location.

COMMENT 25: TCEQ's Responsibility to the Community / Project Opposition and Support

Commenters asked that the TCEQ consider residents and their wishes and choose not to issue the permit. Commenters stated that the TCEQ should uphold its mission statement and protect the surrounding environment by not issuing the permit. Keith Wilcox commented that the proposed facility was an irresponsible idea and plan and questioned why the government isn't protecting the local public. Stephanie Ryder Morris stated TCEQ has failed to enforce water and air quality standards and expressed concern that applicable standards are not strict enough. Group A called upon TCEQ to rescind its preliminary decision on the application.

Cynthia P. Long requested TCEQ do a full and thorough review of the permit application and consider the concerns of the neighboring property owners. Joe Owen commented that the application deserves the highest scrutiny. Tami Baker requested that landowners have the ability to have a say in their future. Sandra Lee Thurman stated that TCEQ and other regulators must withdraw and deny other permits for this facility. John Martin questioned how close the TCEQ personnel reviewing the application lived in relation to the proposed facility.

Barry L. Bowden stated that after learning no water discharges would be authorized by this permit, he was in support of the project. John G. Dupont also commented in favor of the proposed facility.

(Senator Charles Schwertner, County Commissioner Cynthia P. Long, Group A, Group B, Group D, Maude Allen, Mark Baker, Tami Baker, Kristyn Barry, Stephen Bauer, Stephen David Bauer, Joy Borjes, Barry L. Bowden, Twila Bowden, Whitney Brace, Alex Campo, Robert Carwell, Monica Castro, C. D. Cook, Grant Cross, Cristin L. Dershem, Franchesca C. Estrada, Sheryl Marie Farley, Dylan Michael Foley, Amanda Foster, Elizabeth Ann Friou, Jillian Gabriel, Shannon Gehrler, Richard Grabish, Kelley Heath, Chelsey Heil, Brenda Hendrickson, Liz Howells, Brian S. Jalufka, Matthew Johnson, Suzanne Johnson, Timothy King, Lars Kuslich, Ericka Lamanna, Katrina D. Leal, Babu Madala, Alycen Malone, John Martin, Sherri Martin, Lnda Martinez, Bryce P. McCormick, Timothy McDaniel, Ronal Dalton McLoud, Jannah Mersiovsky, Karen Milone, Stephanie Ryder Morris, Cindy Nash, Abby Ogletree, Brittney Ortiz, Joe Owen, Heather Pacheco, Emily Patterson, Corrina Pointer, Bryan Primrose, Jackie Primrose, Travis Redding, Bessie Rhodes, James Richardson, Erika Rix, Whitney Robbins, Chris Robion, Wanda Smith, Jennifer Spies, Tim Thrash, Sandra Lee Thurman, Teresa Tucker, Laura S. Wallace, Frankie Waller, Jason Watkins, Nikki Watkins, Charles Wempe, Shannon White-Shubert, Keith Wilcox, Haziell Williams)

RESPONSE 25: The Executive Director's staff has reviewed the permit application in accordance with the applicable state and federal law, policy and procedures, and the

agency's mission to protect the state's human and natural resources consistent with sustainable economic development. The decision by the Executive Director to issue the permit is based upon the authority and direction of the Texas Clean Air Act. Specifically, TCAA § 382.0518 provides that the TCEQ shall issue the permit if an application demonstrates that the proposed facility will use at least the BACT and there is no indication that the emissions from the facility will contravene the intent of the TCAA. If the plant is operated in compliance with the terms and conditions of the permit, the emissions from the facilities authorized by this permit should not adversely impact public health or the environment.

CHANGES MADE IN RESPONSE TO COMMENT

No changes to the draft permit have been made in response to public comment.

Respectfully submitted,

Texas Commission on Environmental Quality

Toby Baker, Executive Director

Erin E. Chancellor, Director
Office of Legal Services

Charmaine Backens, Deputy Director
Environmental Law Division



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REPRESENTING THE
EXECUTIVE DIRECTOR OF THE
TEXAS COMMISSION ON
ENVIRONMENTAL QUALITY

**Exfluor Research Corporation
Permit No. 165848**

Appendix A

COMMENT GROUP A: Courtney Alcott, Maude McCormick Allen, Nicole Anthony, Rebecca Bartels, Robert Lionel Baskind, James Blake, Lana Blake, Natalie Blankenbaker, Christopher Bunch, Jaime Cadwalder, Randa Chapman, Jude P. Coe, Megan Varvir Coe, Vicci Conway, C. D. Cook, Eric Crop, Vasantha Dacha, Corwin E. Davidson, Amy B. Decosmo, Cristin L. Dershem, Mengbing Dong, Janet Ellis, Guy Endsley, Tanya Endsley, Lauren Endsley, Morgan Endsley, Jennifer Eyre, Jeannie Fickel, Katherine Fuller, Jillian Gabriel, Anna Gandy, Britni Ganze, Brandon Garcia, Kyle Gehrler, Katlyn Green, Heinrich Hafner, Denelle Hager, Michelle Loren Hansen, Jason Hester, Alexandra Hoeffner, Julia Hollis, Rima Huq, Bineeta Jaiswal, Brian S. Jalufka, Sabrina Jannise, Tiffany Johnson, Chesley Jones, Nicole Jones, Erin Kenney, Hemanth Khambhammettu, Karen Kildall, Dolores King, David Kubin, Arun Kumar, Erica Ladden, Kimm Langston, Lauren Larson, Stephanie Long, Dani Lopez, Nichole Manthey, Bryan Martin, Stacy Mattison, Emma May, T. J. McDonald, Kelley McGhie, James Monk, Monica Monk, Henry N. Mulvihill, Patricia Mulvihill, Sheila Nardelli, Cindy Nash, Jake Norman, Kirsten Nottage, Joe J. Pacheco, Laurie F. Pair, Jerome Palmer, Carvey Lee Parkjer, Chris Payton, Bonnie Pearson, Ron Pearson, Renee Peyton, Patti Porter, Gina Rahbari, Ana R. Resto, Larry A. Ridolfi, David Rivera, Katy Ross, Charles Russell, Lem Russell, Margaret Russell, Susan Russell, Cari Salazar, Brian Scott, Nina Smart, Tiffany Stout, Elizabeth Suarez, Thomas L. Swint, Jen Taylor, Mason Tinsley, Tracey Vaandrager, Selena Valdez, Brittany D. Varner, Harold C. Wardlaw, Kimberly Whitney, Ashley Williams, Charles R. Williams, Robert Woolf, and Samantha Woolf

COMMENT GROUP B: Stephen David Bauer, Alex Camp, Elizabeth Ann Friou, Shannon Gehrler, Liz Howells, Babu Madala, Linda Martinez, Abby Ogletree, Brittney Ortiz, Bryan Primrose, and Tim Thrash

COMMENT GROUP C: Lindsey Brassfield, Catherine Johnston, Bryce P. McCormick, Casey Nash, Carla Picinich, and Suze Treacy

COMMENT GROUP D: Fanchesca C. Estrada, Jennifer Eyer, Tyler Andrew Eyre, Nelson Mak, Andres Mendez, Noor Agha Mendez, Nick Novo, Rebecca R. Owens, Robert Smith, Calvin Tait, and Nikki Watkins

Application Exhibit 31

Amended/Consolidated and NORI/NAPD Public Notice Verification Form

**Texas Commission on Environmental Quality
Public Notice Verification Form
Air Permit**


CID#
124292

Applicant Name: Exflur Research Corporation	
Site or Facility Name: Exflur Research	
Application Received Date: 07/09/2021	
TCEQ Account Number (if applicable):	Permit Number: 165848
Regulated Entity Number (RN): RN110969227	Customer Number (CN): CN602696791
All applicants must complete all applicable portions of this form. Send this completed form to the TCEQ to the attention of the Office of the Chief Clerk within 10 business days after the end of the designated comment period. For more information regarding public notice, refer to the instructions in the public notice package.	
Alternative Language Checklist	
I have contacted the appropriate school district. <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
School District: Florence ISD	Phone Number: (254) 793-2850
Person Contacted: Human Resources	Date: 04/20/2022
Is a bilingual education program (BEP) required by the Texas Education Code in the district? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
If answer is "NO," skip to first question in verification box on next page. (Note: A BEP is different from "English as a Second Language" (ESL) program; and Elementary/Middle schools that only offer ESL will not trigger notice in an alternative language.)	
Notice in an alternative language is required if a BEP is required in the District, and one of the following conditions is met:	
1. students in the elementary or middle school nearest the facility are enrolled in a program at that school;	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
2. students from the elementary or middle school nearest the facility attend a BEP at another location; or	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
3. the school district that otherwise would be required to provide a BEP has been granted an exception from the requirements to provide the program, as provided for in 19 Texas Administrative Code 89.1207(a).	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
If the answer is "NO" to 1, 2, and 3 above, then alternative language notice is not required.	
The name of the elementary school nearest to the proposed or existing facility is:	
Florence Elementary School	
The name of the middle school nearest to the proposed or existing facility is:	
Florence Middle School	
The following language(s) is/are utilized in the bilingual program:	
Spanish	
If notice in an alternative language is required, then applicants must publish alternative language notice(s) and post alternative language sign(s), as outlined in the <i>Instructions for Public Notice</i> and certify compliance with those requirements on this form.	

**Texas Commission on Environmental Quality
Public Notice Verification Form
Air Permit**

Applicant Name: Exflur Research Corporation	
Site or Facility Name: Exflur Research	
Application Received Date: 07/09/2021	
TCEQ Account Number (if applicable):	Permit Number: 165848
Regulated Entity Number (RN): RN110969227	Customer Number (CN): CN602696791
For more information regarding public notice, refer to the instructions in the public notice package.	
Alternative Language Verification	
1. A BEP is required by the Texas Education Code in the area addressed by this permit application and is subject to alternative language public notice requirements. If "NO," skip 2 through 6 and complete signature, title, date, and name of applicant.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
2. The applicant has conducted a diligent search for a newspaper or publication of general circulation in both the municipality and county in which the facility is located (or proposed to be located).	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
3. A newspaper or publication could not be found in any of the alternative language(s) in which notice is required.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
4. The publishers of the newspaper listed below refused to publish the notice as requested, and another newspaper or publication in the same language and of general circulation could not be found in the municipality or county in which the facility is located (or proposed to be located).	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A
Newspaper: El Mundo	Language: Spanish
5. Proof of publication of the newspaper alternative language notice(s) and the requested affidavits have been sent to the TCEQ.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
6. Alternative language signs were posted as required by the TCEQ.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
This form must be signed and dated by a designated representative acting on behalf of the applicant after the end of the designated comment period. Send this completed form to the TCEQ to the attention of the Office of the Chief Clerk within 10 business days after the end of the designated comment period. The TCEQ will not accept this form if submitted prior to that date.	
Verified by (signature): <i>ETA</i>	
Applicant: Exflur Research Corporation	
Title: Head of Engineering	Date: 9/12/2022

**Texas Commission on Environmental Quality
Public Notice Verification Form
Air Permit**

Applicant Name: Exflur Research Corporation	
Site or Facility Name: Exflur Research	
Application Received Date: 07/09/2021	
TCEQ Account Number (if applicable):	Permit Number: 165848
Regulated Entity Number (RN): RN110969227	Customer Number (CN): CN602696791
For more information regarding public notice, refer to the instructions in the public notice package.	
New Source Review Permit Notice Verification (Complete this section, if applicable)	
Proof of publication of the newspaper notices and the requested affidavits have been furnished in accordance with the regulations and instructions of the TCEQ.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Notice of Receipt of Application and Intent to Obtain Permit (1st Notice):	
Required signs (for 1st notice) were posted in accordance with the regulations and instructions of the TCEQ.	<input type="checkbox"/> Yes <input type="checkbox"/> No
A copy of the administratively complete air quality application, and any revisions, were available for review and copying at the public place indicated below throughout the duration of the public comment period.	<input type="checkbox"/> Yes <input type="checkbox"/> No
The public place indicated below provides public access to the internet (for PSD, nonattainment, or FCAA 112(g) Permit).	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
Notice of Application and Preliminary Decision (2nd Notice, if applicable):	
A copy of the complete air quality application (including any subsequent revisions to the application), executive director's preliminary decision (which includes the draft permit), the preliminary determination summary and air quality analysis (if applicable), are available for review and copying at the public place indicated below from the first day after newspaper publication, and will remain available until either: (1) the TCEQ acts on the application; or (2) the application is referred to the State Office of Administrative Hearings (SOAH) for hearing	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Name of Public Place: Eula Hunt Beck Florence Public Library	
Address of Public Place: 207 E Main St	
City: Florence	State: Texas
ZIP Code: 76527	
This form must be signed and dated by a designated representative acting on behalf of the applicant after the end of the designated comment period. Send this completed form to the TCEQ to the attention of the Office of the Chief Clerk within 10 business days after the end of the designated comment period. The TCEQ will not accept this form if submitted prior to that date.	
Verified by (signature): 	
Applicant: Exflur Research Corporation	
Title: Head of Engineering	Date: 9/12/2022

**Texas Commission on Environmental Quality
Public Notice Verification Form
Air Permit**

Applicant Name: Exflur Research Corporation		
Site or Facility Name: Exflur Research		
Application Received Date: 07/09/2021		
TCEQ Account Number (if applicable):	Permit Number: 165848	
Regulated Entity Number (RN): RN110969227	Customer Number (CN): CN602696791	
For more information regarding public notice, refer to the instructions in the public notice package.		
Federal Operating Permit (Title V) Notice Verification (Complete this section, if applicable)		
I verify that the required signs were posted in accordance with the regulations and instructions of the TCEQ.	<input type="checkbox"/> Yes <input type="checkbox"/> No	
I verify that proof of publication of the newspaper notices and the requested affidavits have been furnished in accordance with the regulations and instruction of the TCEQ.	<input type="checkbox"/> Yes <input type="checkbox"/> No	
I verify that a copy of the complete air quality application (including any subsequent revisions to the application) and draft permit were available for review and copying at the public place indicated below throughout the duration of the public comment period.	<input type="checkbox"/> Yes <input type="checkbox"/> No	
Name of Public Place:		
Address of Public Place:		
City:	State:	ZIP Code:
<p>This form must be signed and dated by a designated representative acting on behalf of the applicant after the end of the designated comment period. Send this completed form to the TCEQ to the attention of the Office of the Chief Clerk within 10 business days after the end of the designated comment period. The TCEQ will not accept this form if submitted prior to that date.</p>		
Verified by (signature): <i>E T Red</i>		
Applicant: Exflur Research Corporation		
Title: Head of Engineering	Date: 9/12/2022	

PRINT FORM

RESET FORM

Debbie Zachary

From: luke.bernhard@exfluor.com
Sent: Monday, September 12, 2022 1:21 PM
To: PROOFS
Cc: Eric Bierschenk; Cara Hill; Betsy Peticolas; Joel Stanford
Subject: Exfluor Research Public Notice Verification Form (20244) - 165848
Attachments: Exfluor Research_public notice Verification.pdf

Cara and Betsy,

I have attached the Public Notice Verification form for the most recent public notice period for Exfluor Research (Permit 165848). I am the EHS manager for Exfluor and have recently returned from my military leave. If we are missing any other items, please do not hesitate to reach out to me so I can get them into you as soon as I can.

Luke Bernhard
Exfluor Research
EHS Manager
Round Rock, Texas
C: 512-762-6622
O: 512-310-9044
exfluor.com



Virus-free. www.avast.com

Application Exhibit 32

Final ED Decision Letter and Mailing of TCEQ ED's RTC

Jon Niermann, *Chairman*
Emily Lindley, *Commissioner*
Bobby Janecka, *Commissioner*
Toby Baker, *Executive Director*



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

September 13, 2022

TO: All interested persons.

RE: Exflor Research Corporation
NSR Permit No. 165848

Decision of the Executive Director.

The executive director has made a decision that the above-referenced permit application meets the requirements of applicable law. **This decision does not authorize construction or operation of any proposed facilities.** This decision will be considered by the commissioners at a regularly scheduled public meeting before any action is taken on this application unless all requests for contested case hearing or reconsideration have been withdrawn before that meeting.

Enclosed with this letter is a copy of the Executive Director's Response to Comments. A copy of the complete application, draft permit and related documents, including public comments, are available for review at the TCEQ Central Office. A copy of the complete application, the draft permit, and executive director's preliminary decision are available for viewing and copying at the Eula Hunt Beck Florence Public Library, 207 East Main Street, Williamson County, Texas.

If you disagree with the executive director's decision, and you believe you are an "affected person" as defined below, you may request a contested case hearing. In addition, anyone may request reconsideration of the executive director's decision. The procedures for the commission's evaluation of hearing requests/requests for reconsideration are located in 30 Texas Administrative Code Chapter 55, Subchapter F. A brief description of the procedures for these two types of requests follows.

How to Request a Contested Case Hearing.

It is important that your request include all the information that supports your right to a contested case hearing. You must demonstrate that you meet the applicable legal requirements to have your hearing request granted. The commission's consideration of your request will be based on the information you provide.

The request must include the following:

- (1) Your name, address, daytime telephone number, and, if possible, a fax number.
- (2) If the request is made by a group or association, the request must identify:
 - (A) one person by name, address, daytime telephone number, and, if possible, the fax number, of the person who will be responsible for receiving all communications and documents for the group;
 - (B) the comments on the application submitted by the group that are the basis of the hearing request; and
 - (C) by name and physical address one or more members of the group that would otherwise have standing to request a hearing in their own right. The interests the group seeks to protect must relate to the organization's purpose. Neither the claim asserted nor the relief requested must require the participation of the individual members in the case.
- (3) The name of the applicant, the permit number and other numbers listed above so that your request may be processed properly.
- (4) A statement clearly expressing that you are requesting a contested case hearing. For example, the following statement would be sufficient: "I request a contested case hearing."

Your request must demonstrate that you are an **"affected person."** An affected person is one who has a personal justiciable interest related to a legal right, duty, privilege, power, or economic interest affected by the application. Your request must describe how and why you would be adversely affected by the proposed facility or activity in a manner not common to the general public. For example, to the extent your request is based on these concerns, you should describe the likely impact on your health, safety, or uses of your property which may be adversely affected by the proposed facility or activities. To demonstrate that you have a personal justiciable interest, you must state, as specifically as you are able, your location and the distance between your location and the proposed facility or activities. A person who may be affected by emissions of air contaminants from the facility is entitled to request a contested case hearing.

Your request must raise disputed issues of fact that are relevant and material to the commission's decision on this application that were raised **by you** during the public comment period. The request cannot be based solely on issues raised in comments that you have withdrawn.

To facilitate the commission's determination of the number and scope of issues to be referred to hearing, you should: 1) specify any of the executive director's responses to **your** comments that you dispute; 2) the factual basis of the dispute; and 3) list any disputed issues of law.

How to Request Reconsideration of the Executive Director's Decision.

Unlike a request for a contested case hearing, anyone may request reconsideration of the executive director's decision. A request for reconsideration should contain your name, address, daytime phone number, and, if possible, your fax number. The request must state that you are requesting reconsideration of the executive director's decision, and must explain why you believe the decision should be reconsidered.

Deadline for Submitting Requests.

A request for a contested case hearing or reconsideration of the executive director's decision must be **received** by the Chief Clerk's office no later than **30 calendar days** after the date of this letter. You may submit your request electronically at www.tceq.texas.gov/agency/decisions/cc/comments.html or by mail to the following address:

Laurie Gharis, Chief Clerk
TCEQ, MC-105
P.O. Box 13087
Austin, Texas 78711-3087

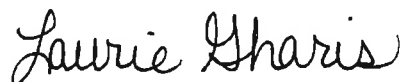
Processing of Requests.

Timely requests for a contested case hearing or for reconsideration of the executive director's decision will be referred to the TCEQ's Alternative Dispute Resolution Program and set on the agenda of one of the commission's regularly scheduled meetings. Additional instructions explaining these procedures will be sent to the attached mailing list when this meeting has been scheduled.

How to Obtain Additional Information.

If you have any questions or need additional information about the procedures described in this letter, please call the Public Participation and Education Program, toll free, at 1-800-687-4040.

Sincerely,



Laurie Gharis
Chief Clerk

LG/erg

Enclosure

EXECUTIVE DIRECTOR'S RESPONSE TO PUBLIC COMMENTS
for
Exflur Research Corporation
NSR Permit No. 165848

The Executive Director has made the Response to Public Comment (RTC) for the application by Exflur Research Corporation for NSR Permit No. 165848 available for viewing on the Internet. You may view and print the document by visiting the TCEQ Commissioners' Integrated Database at the following link:

<https://www.tceq.texas.gov/goto/cid>

In order to view the RTC at the link above, enter the TCEQ ID Number for this application (165848) and click the "Search" button. The search results will display a link to the RTC.

Individuals who would prefer a mailed copy of the RTC or are having trouble accessing the RTC on the website, should contact the Office of the Chief Clerk, by phone at (512) 239-3300 or by email at chiefclk@tceq.texas.gov.

Additional Information

For more information on the public participation process, you may contact the Office of the Public Interest Counsel at (512) 239-6363 or call the Public Education Program, toll free, at (800) 687-4040.

You may also view a copy of the RTC, the complete application, the draft permit, and related documents, including comments, at the TCEQ Central Office in Austin, Texas. Additionally, a copy of the complete application, the draft permit, and executive director's preliminary decision are available for viewing and copying at the Eula Hunt Beck Florence Public Library, 207 East Main Street, Williamson County, Texas.

MAILING LIST
for
Exflur Research Corporation
NSR Permit No. 165848

FOR THE APPLICANT:

Thomas Bierschenk, Ph.D., Vice President
Exflur Research Corporation
2350 Double Creek Dr
Round Rock, Texas 78664

Luke Bernhard, EHS Manager
Exflur Research Corporation
2350 Double Creek Dr
Round Rock, Texas 78664

Arloe Fontenot, EHS Manager
Exflur Research Corporation
2350 Double Creek Dr
Round Rock, Texas 78664

INTERESTED PERSONS:

See attached list.

FOR THE EXECUTIVE DIRECTOR
via electronic mail:

Ryan Vise, Deputy Director
Texas Commission on Environmental
Quality
External Relations Division
Public Education Program MC-108
P.O. Box 13087
Austin, Texas 78711-3087

Amanda Kraynok, Staff Attorney
Texas Commission on Environmental
Quality
Environmental Law Division MC-173
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Betsy Peticolas, Staff Attorney
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Environmental Law Division MC-173
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Austin, Texas 78711-3087

Cara Hill, Technical Staff
Texas Commission on Environmental
Quality
Air Permits Division MC-163
P.O. Box 13087
Austin, Texas 78711-3087

FOR PUBLIC INTEREST COUNSEL
via electronic mail:

Garrett T. Arthur, Attorney
Texas Commission on Environmental
Quality
Public Interest Counsel MC-103
P.O. Box 13087
Austin, Texas 78711-3087

FOR THE CHIEF CLERK
via electronic mail:

Laurie Gharis, Chief Clerk
Texas Commission on Environmental
Quality
Office of Chief Clerk MC-105
P.O. Box 13087
Austin, Texas 78711-3087

ALCOTT, COURTNEY
108 SAN MARINO TRL
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ALLEN, MAUDE MCCORMICK
1251 COUNTY ROAD 208
FLORENCE TX 76527-4275

ANDREWS, SARAH
5945 HIGHWAY 138
FLORENCE TX 76527-4222

ANTHONY, NICOLE
400 EARL KEEN ST
LEANDER TX 78641-4354

ARCE, FEDERICO I
10116 ANDRE DR
IRVING TX 75063-5932

BAKER, MR MARK
5420 COUNTY ROAD 236
LIBERTY HILL TX 78642-3743

BAKER, TAMI
BLUE LINE REALTY LLC
901 COUNTY ROAD 209
LIBERTY HILL TX 78642-3740

BARRY, MRS KRISTYN
1250 COUNTY ROAD 207
LIBERTY HILL TX 78642-3750

BARTELS, MS REBECCA
PO BOX 1051
CEDAR PARK TX 78630-1051

BASKIND, ROBERT LIONEL
165 MALLARD LN
LEANDER TX 78641-2709

BAUER, STEPHEN DAVID
800 HIDDEN BEAR RD
LIBERTY HILL TX 78642-4634

BEESELEY, DANIAL
709 OAK CREST LN
GEORGETOWN TX 78628-2622

BERRY, DR. DON T
829 CASTLE RIDGE RD
AUSTIN TX 78746-5105

BEVILLE, ANNE KATHRINE
443 COUNTY ROAD 278
LIBERTY HILL TX 78642-4378

BIERSCHENK, ANN
590 YOUNG RANCH RD
GEORGETOWN TX 78633-6651

BLAKE, JAMES
604 PURPLE SALVIA CV
LIBERTY HILL TX 78642-2382

BLAKE, LANA
604 PURPLE SALVIA CV
LIBERTY HILL TX 78642-2382

BLANKENBAKER, NATALIE
701 DUBINA AVE
GEORGETOWN TX 78626-2616

BORJES, JOY
216 CAPSTONE RD
LIBERTY HILL TX 78642-3620

BOWDEN, BARRY L
PURCELL FARM
708 COUNTY ROAD 208
FLORENCE TX 76527-4751

BOWDEN, TWILA
708 COUNTY ROAD 208
FLORENCE TX 76527-4751

BOX, GEN RICHARD ARTHUR
2504 SPRING LN
AUSTIN TX 78703-1743

BRACE, CONOR
611 COWBOY TRL
LIBERTY HILL TX 78642-4019

BRACE, DR. WHITNEY
611 COWBOY TRL
LIBERTY HILL TX 78642-4019

BRASSFIELD, LINDSEY
516 WARLANDER WAY
GEORGETOWN TX 78626-4353

BREDTHAUER, LARRY
3360 COUNTY ROAD 282
LEANDER TX 78641-9076

BROOKS, ASHLEY
111 CREEKSIDE DR
LIBERTY HILL TX 78642-3936

BUNCH, CHRISTOPHER
101 MILESTONE RD
LIBERTY HILL TX 78642-4409

CADWALADER, JAIME
105 RETAMA TREE TRCE
LIBERTY HILL TX 78642-2223

CAMPO, ALEX
PO BOX 40
WEIR TX 78674-0040

CARLSON , SUSAN G
128 N SHOWHORSE DR
LIBERTY HILL TX 78642-3928

CARLTON , EILEEN
137 HIGH RIVER RANCH DR
LIBERTY HILL TX 78642-5755

CARWELL , MR ROBERT
6600 COUNTY ROAD 200
LIBERTY HILL TX 78642-3725

CASTRO , MONICA
1630 COUNTY ROAD 279
LIBERTY HILL TX 78642-4299

CHAPMAN , RANDA
1244 COUNTY ROAD 202
LIBERTY HILL TX 78642-2335

COE , JUDE & MEGAN
1235 RIVER RIDGE RANCH RD
KILLEEN TX 76549-3332

COE , JUDE P
1235 RIVER RIDGE RANCH RD
KILLEEN TX 76549-3332

CONWAY , VICCI
668 SPEED HORSE
LIBERTY HILL TX 78642-4782

COOK , C D
209 CHADWICK DR
GEORGETOWN TX 78628-7207

COOK , TERRY COMMISSIONER
WILLIAMSON COUNTY PRECINCT I
STE 110
1801 E OLD SETTLERS BLVD
ROUND ROCK TX 78664-1905

COOK , TERRY
3116 GOLDENOAk CIR
ROUND ROCK TX 78681-2290

COX , TIM
181 RIO GABRIEL DR
LIBERTY HILL TX 78642-5782

CROP , MR ERIC
1799 COUNTY ROAD 223
FLORENCE TX 76527-4231

CROSS , GRANT
158 BARN OWL LOOP
LEANDER TX 78641-1881

CROSS , KAREN
31161 RIVERWOOD RD
MILLSBORO DE 19966-7299

DACHA , VASANTHA
13811 BOYLE LN
FRISCO TX 75035-0375

DAVIDSON , CORWIN E
100 CLEAR CREEK RD
LIBERTY HILL TX 78642-3719

DAVIDSON , PAUL
100 CLEAR CREEK RD
LIBERTY HILL TX 78642-3719

DAVOL , PHEBE
5675 W FM 487
FLORENCE TX 76527-4123

DEBARBIERI , ERIN
109 NORTHERN HARRIER CT
LEANDER TX 78641-4524

DECOSMO , AMY B
120 RETAMA TREE TRCE
LIBERTY HILL TX 78642-2223

DERSHEM , CRISTIN L
141 TAMBRA LEA LN
LIBERTY HILL TX 78642-2359

DONG , MENG BING
905 UMBRELLA SKY
LIBERTY HILL TX 78642-2233

DUPONT , JOHN G
DHL ANALYTICAL
2300 DOUBLE CREEK DR
ROUND ROCK TX 78664-3801

EATON , WAYNE
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BRIGGS TX 78608-0014

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223 CARRIAGE OAKS DR
LIBERTY HILL TX 78642-3853

ELMORE , RAYMOND & ROBERTA
4155 COUNTY ROAD 223
KEMPNER TX 76539-3818

ENDSLEY , MR GUY
4600 COUNTY ROAD 207
LIBERTY HILL TX 78642-3799

ENDSLEY , LAUREN
4600 COUNTY ROAD 207
LIBERTY HILL TX 78642-3799

ENDSLEY , MORGAN
4600 COUNTY ROAD 207
LIBERTY HILL TX 78642-3799

ENDSLEY , TANYA
4600 COUNTY ROAD 207
LIBERTY HILL TX 78642-3799

ESTRADA , DR. FRANCESCA C
249 COWBOY TRL
LIBERTY HILL TX 78642-3954

EYRE , JENNIFER
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GEORGETOWN TX 78628-6899

EYRE , TYLER ANDREW
305 RIDGE VIEW DR
GEORGETOWN TX 78628-6899

FARLEY , MS SHERYL MARJE
6600 COUNTY ROAD 200
LIBERTY HILL TX 78642-3725

FICKEL , MRS JEANNIE
2775 COUNTY ROAD 207
LIBERTY HILL TX 78642-3778

FIGGINS , ANTHONY
101 QUARRY ROCK LOOP
LIBERTY HILL TX 78642-4039

FINKEL , JENNIFER
255 COUNTY ROAD 250
GEORGETOWN TX 78633-4042

FOLEY , DYLAN MICHAEL
3750 COUNTY ROAD 201
LIBERTY HILL TX 78642-3834

FOSTER , AMANDA
132 LOCKHART DR
LIBERTY HILL TX 78642-2318

FRATZKE , SUSANNE
301 LAKEWAY
KILLEEN TX 76549-3519

FRIOU , ELIZABETH ANN
5203 RIDGE OAK DR
AUSTIN TX 78731-4811

FULLER , KATHERINE
177 EAGLE OWL LOOP
LEANDER TX 78641-2712

GABRIEL , JILLIAN
105 LARK ST
LEANDER TX 78641-1890

GANDY , ANNA
211 NORMAL SCHOOL WAY
LIBERTY HILL TX 78642-4892

GANZE , BRITNI
205 WESTON DR
LIBERTY HILL TX 78642-5560

GARCIA , BRANDON
441 FALCON LN
LEANDER TX 78641-1771

GARRETT , CARLEEN T
220 BRANDY LOOP
KILLEEN TX 76549-9049

GARRETT , STEPHANIE
1056 DEER PARK RD
KILLEEN TX 76542-5047

GEHRER , KYLE
1200 COUNTY ROAD 236
FLORENCE TX 76527-4850

GEHRER , SHANNON
1200 COUNTY ROAD 236
FLORENCE TX 76527-4850

GEORGE , MR WILLIAM PATRICK
2301 COUNTY ROAD 223
FLORENCE TX 76527-4214

GRABISH , RICHARD
201 SHADY OAKS TRL
LIBERTY HILL TX 78642-3944

GREEN , KATLYN
221 KING ELDER LN
LEANDER TX 78641-1738

GROSS , CHARLES
5731 COUNTY ROAD 236
LIBERTY HILL TX 78642-2300

GUTIERREZ , CHRISTI LACHELLE
218 QUARRY ROCK LOOP
LIBERTY HILL TX 78642-4040

HAFNER , HEINRICH
6750 COUNTY ROAD 200
LIBERTY HILL TX 78642-3974

HAGER , DENELLE
5900 COUNTY ROAD 236
LIBERTY HILL TX 78642-2460

HANSEN , MICHELLE LOREN
415 LAKEWAY
KILLEEN TX 76549-5857

HAYES , JOANNA R
424 DRYSTONE TRL
LIBERTY HILL TX 78642-4373

HEATH, KELLEY
205 TALON GRASP TRL
LEANDER TX 78641-2595

HEIL, CHELSEY
516 TALON GRASP TRL
LEANDER TX 78641-3414

HEIMBIGNER, GLENN
147 RICHLAND VIEW RD
LIBERTY HILL TX 78642-4041

HEIMBIGNER, JODIE
147 RICHLAND VIEW RD
LIBERTY HILL TX 78642-4041

HENDRICKSON, BRENDA
137 TORDESILLAS DR
GEORGETOWN TX 78626

HENLEY, JAMES
304 Tanager PASS
LEANDER TX 78641-3841

HESTER, JASON
200 CHANDLER CROSSING TRL
ROUND ROCK TX 78665-2837

HILLIS, ED
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LEANDER TX 78641-8585

HOEFFNER, MS ALEXANDRA E
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LEANDER TX 78641-8585

HOLLIS, JULIA
1025 LEEDS CASTLE WALK
GEORGETOWN TX 78626-8031

HOWELLS, LIZ
1818 BLUFFWOOD PL
ROUND ROCK TX 78665-5610

HOWLAND, LUANN
9548 N HIGHWAY 183
FLORENCE TX 76527-4224

HUQ, RIMA
4913 STRADA DR
ROUND ROCK TX 78665-2265

ICE, LAUREN
PERALES ALLMON & ICE PC
1206 SAN ANTONIO ST
AUSTIN TX 78701-1834

JAGODZINSKI, ANDREA
216 CAPITAL HILL VW
LIBERTY HILL TX 78642-2241

JAGODZINSKI, SHAWN
216 CAPITAL HILL VW
LIBERTY HILL TX 78642-2241

JAISWAL, BINEETA
1906 LAMINAR CREEK RD
CEDAR PARK TX 78613-5843

JALUFKA, BRIAN S
1650 COUNTY ROAD 204
LIBERTY HILL TX 78642-3586

JAMES, DANA R
725 HI RIDGE DR
KILLEEN TX 76549-5875

JANNISE, SABRINA
116 CHICKADEE LN
LEANDER TX 78641-2703

JOHNSON, MATTHEW
900 COUNTY ROAD 202
LIBERTY HILL TX 78642-3767

JOHNSON, SUZANNE
JOHNSON WOODS
1400 COUNTY ROAD 236
FLORENCE TX 76527-4918

JOHNSON, TIFFANY
2500 COUNTY ROAD 207
LIBERTY HILL TX 78642-4044

JOHNSTON, CATHERINE
4960 HIGHWAY 138
FLORENCE TX 76527-4901

JONES, MRS CHESLEY
100 GOLDEN EAGLE LN
LEANDER TX 78641-2717

JONES, NICOLE
145 TAMBRA LEA LN
LIBERTY HILL TX 78642-2359

KALINOWSKI, CHRIS & MOLLY
5720 COUNTY ROAD 236
LIBERTY HILL TX 78642-3302

KANETZKY, CONNIE
9540 N HIGHWAY 183
FLORENCE TX 76527-4224

KANETZKY, JERRY
9540 N HIGHWAY 183
FLORENCE TX 76527-4224

KANETZKY , MARISSA
9540 N HIGHWAY 183
FLORENCE TX 76527-4224

KENNEY , ERIN
109 NORTHERN HARRIER CT
LEANDER TX 78641-4524

KHAMBHAMMETTU , HEMANTH
401 NORTHCREST DR
LIBERTY HILL TX 78642-2392

KILDALL , KAREN
421 RIO GABRIEL CV
LIBERTY HILL TX 78642-5794

KING , DOLORES
157 CASCATA WAY
LIBERTY HILL TX 78642-2125

KING , TIMOTHY
157 CASCATA WAY
LIBERTY HILL TX 78642-2125

KINGHORN , JULES
400 COUNTY ROAD 228
FLORENCE TX 76527-4833

KUBIN , DAVID
741 R O RANCH RD
LIBERTY HILL TX 78642-3977

KUMAR , ARUN
905 UMBRELLA SKY
LIBERTY HILL TX 78642-2233

KUSLICH , LARS
PO BOX 1908
LIBERTY TX 77575-1908

LADDEN , MRS ERICA
104 KINGFISHER LN
LEANDER TX 78641-3421

LAMANNA , ERICKA
439 TALON GRASP TRL
LEANDER TX 78641-3413

LANGSTON , KIMM
113 ESPERANZA PETAL PASS
LIBERTY HILL TX 78642-2221

LARSON , LAUREN
101 POST OAK RANCH RD
LIBERTY HILL TX 78642-3559

LEAL , KATRINA D
400 KINGFISHER LN
LEANDER TX 78641-1796

LEGAULT , MARILYN ANN
501 COUNTY ROAD 266
GEORGETOWN TX 78628-6838

LONERGAN , GWYNETH
PERALES ALLMON & ICE PC
1206 SAN ANTONIO ST
AUSTIN TX 78701-1834

LONG , CYNTHIA P
STE 201
350 DISCOVERY BLVD
CEDAR PARK TX 78613-2260

LONG , STEPHANIE
237 CALERA ST
LIBERTY HILL TX 78642-2192

LOPEZ , DANI
541 PEACE DR
LIBERTY HILL TX 78642-2258

LOVE , JAN
101 BETHEL ST
GEORGETOWN TX 78633-4635

MADALA , BABU
1501 COUNTY ROAD 223
FLORENCE TX 76527-4259

MAK , NELSON
812 GABRIEL MILLS DR
ROUND ROCK TX 78664-7911

MALONE , ALYCEN
158 BARN OWL LOOP
LEANDER TX 78641-1881

MANTHEY , MRS NICHOLE
140 FLOYDS RUN
BERTRAM TX 78605-4807

MARTIN , BRYAN
2112 BEAR CREEK DR
LEANDER TX 78641-4471

MARTIN , JOHN
1450 COUNTY ROAD 208
FLORENCE TX 76527-4276

MARTIN , MRS SHERRI
1450 COUNTY ROAD 208
FLORENCE TX 76527-4276

MARTINEZ , LINDA
1044 RIVER RNCH
LIBERTY HILL TX 78642-4890

MARTINEZ , LINDA
1044 RIVER RNCH
LIBERTY HILL TX 78642-4890

MASSEY , MARY
270 COLE DR
LIBERTY HILL TX 78642-4511

MATAU , PAMELA
800 COUNTY ROAD 266
GEORGETOWN TX 78628-6839

MATTISON , MRS STACY
151 FALON LN
LIBERTY HILL TX 78642-4321

MAY , EMMA
112 LOCKLIN DR
LIBERTY HILL TX 78642-2137

MCCORMICK , MR BRYCE P
NORTH SAN GABRIEL ALLIANCE
1250 COUNTY ROAD 208
FLORENCE TX 76527-4628

MCCORMICK , CHARLES
1059 COUNTY ROAD 208
FLORENCE TX 76527-4226

MCDANIEL , TIMOTHY
1800 COUNTY ROAD 208
FLORENCE TX 76527-4235

MCDONALD , T J
900 COUNTY ROAD 236
FLORENCE TX 76527-4835

MCGHIE , KELLEY
304 REMUDA
LIBERTY HILL TX 78642-4550

MCCLOUD , RONAL DALTON
4810 COUNTY ROAD 207
LIBERTY HILL TX 78642-4023

MENDEZ , ANDRES
330 MISTY WOOD
BERTRAM TX 78605-4486

MENDEZ , MRS NOOR AGHA
330 MISTY WOOD
BERTRAM TX 78605-4486

MERSIOVSKY , JANNAH
109 TAMBRA LEA LN
LIBERTY HILL TX 78642-2359

MERTON , DANNY P
1059 COUNTY ROAD 208
FLORENCE TX 76527-4226

METCALFE , ALLISON
1200 ASH DR
MARBLE FALLS TX 78654-7231

MILONE , KAREN
208 N HAVEN DR
LIBERTY HILL TX 78642-2387

MOHR , KENNITH
PO BOX 1686
CEDAR PARK TX 78630-1686

MONK , JAMES
750 ABBEY RD
LIBERTY HILL TX 78642-3996

MONK , MONICA
750 ABBEY RD
LIBERTY HILL TX 78642-3996

MOORE , CONNIE
112 HOOT OWL LN N
LEANDER TX 78641-1727

MORRIS , STEPHANIE RYDER
BIRDS N BEES FARM
1409 ORCHARD DR
LEANDER TX 78641-1368

MULVIHILL , HENRY
8 LUNDYS LN
RICHARDSON TX 75080-2343

MULVIHILL JR , HENRY N
PO BOX 831945
RICHARDSON TX 75083-1945

MULVIHILL , PATRICIA
NORTH SAN GABRIEL ALLIANCE
8 LUNDYS LN
RICHARDSON TX 75080-2343

NARDELLI , SHEILA
530 ABBEY RD
LIBERTY HILL TX 78642-3994

NASH , CASEY
7603 ISLANDER DR
AUSTIN TX 78749-3028

NASH , CINDY
205 ENCORE DR
LIBERTY HILL TX 78642-2147

NORMAN , JAKE
1500 COUNTY ROAD 225
FLORENCE TX 76527-3852

NOTTAGE , KIRSTEN
115 LIMONITE LN
LIBERTY HILL TX 78642-4690

NOVO , NICK
116 SHADY OAKS TRL
LIBERTY HILL TX 78642-3945

NOVO , SARAH
116 SHADY OAKS TRL
LIBERTY HILL TX 78642-3945

OGLETREE , ABBY
425 CANADIAN SPRINGS DR
LEANDER TX 78641-3528

ORTIZ , MRS BRITTNEY
120 COUNTY ROAD 279
LIBERTY HILL TX 78642-4245

OWEN , MR JOE
OWEN HOLDINGS
4718 MILL CREEK RD
DALLAS TX 75244-6916

OWENS , MRS REBECCA R
20307 MCSHEPHERD RD
GEORGETOWN TX 78626-9320

PACHECO , MRS HEATHER
201 COWBOY TRL
LIBERTY HILL TX 78642-3954

PACHECO , JOE J
201 COWBOY TRL
LIBERTY HILL TX 78642-3954

PAIR , LAURIE F
PO BOX 5908
AUSTIN TX 78763-5908

PALMER , JEROME
333 HIDDEN OAKS LN
LIBERTY HILL TX 78642-3726

PARKJER , MR CARVEY LEE
105 ROSA DR
LIBERTY HILL TX 78642-2190

PATEL , TANARA
128 RAVELLO ST
LIBERTY HILL TX 78642-2306

PATTERSON , EMILY
140 PARRYI CV
LEANDER TX 78641-4720

PAVLICEK , ALOIS
1105 DEER RUN
ROUND ROCK TX 78681-6436

PEARSON , BONNIE
5545 COUNTY ROAD 200
LIBERTY HILL TX 78642-3721

PEARSON , LOYD
351 COUNTY ROAD 210
LIBERTY HILL TX 78642-3741

PEARSON , RON
5545 COUNTY ROAD 200
LIBERTY HILL TX 78642-3721

PEYTON , CHRIS
132 KRUPP AVE
LIBERTY HILL TX 78642-4476

PEYTON , RENEE
132 KRUPP AVE
LIBERTY HILL TX 78642-4476

PICINICH , CARLA
2101 COUNTY ROAD 226
FLORENCE TX 76527-4868

POINTER , MRS CORRINA
162 ELISHA DR
LIBERTY HILL TX 78642-2257

PORTER , PATTI
411 BLESSING RANCH RD
LIBERTY HILL TX 78642-4588

PRIMROSE , BRYAN
3901 COUNTY ROAD 258
LIBERTY HILL TX 78642-2106

PRIMROSE , JACKIE
3901 COUNTY ROAD 258
LIBERTY HILL TX 78642-2106

RAHBARI , GINA
232 HOOT OWL LN N
LEANDER TX 78641-1733

REDDING , TRAVIS
595 GATLIN RANCH RD
LIBERTY HILL TX 78642-3312

RESTO , ANA R
3202 SPOTTED HORSE DR
KILLEEN TX 76542-8413

RHODES , BESSIE
14814 KINGSFORD WILLOW LN
CYPRESS TX 77429-7918

RICHARDSON , JAMES
131 SADDLE LN
LIBERTY HILL TX 78642-4065

RIDOLFI , LARRY A
FTL DRIVES INC
1051 COUNTY ROAD 204
LIBERTY HILL TX 78642-3792

RIVERA , DAVID
105 LARK ST
LEANDER TX 78641-1890

RIVES , BILLY
9755 E FM 243
BERTRAM TX 78605-3848

RIX , ERIKA
251 COUNTY ROAD 203
LIBERTY HILL TX 78642-3714

ROBBINS , RANDAL
249 COWBOY TRL
LIBERTY HILL TX 78642-3954

ROBBINS , WHITNEY
441 SIERRA MAR LOOP
LEANDER TX 78641-3544

ROBERTS , ASHTON
272 QUARTERHORSE DR
LIBERTY HILL TX 78642-3926

ROBERTS , JAMES
272 QUARTERHORSE DR
LIBERTY HILL TX 78642-3926

ROBION , CHRIS
104 REINDEER WAY
GEORGETOWN TX 78626-2547

ROCKE , MARIA YOLANDA
6433 COUNTY ROAD 200
LIBERTY HILL TX 78642-4026

ROCKE , MARK
6433 COUNTY ROAD 200
LIBERTY HILL TX 78642-4026

ROSS , KATY
614 SAN GABRIEL RANCH RD
LIBERTY HILL TX 78642-4555

RUSSELL , CHARLES
RR 1 BOX 93
TEXHOMA OK 73949-9634

RUSSELL , LEM
PO BOX 1294
STRATFORD TX 79084-1294

RUSSELL , MARGARET
RR 1 BOX 35
TEXHOMA OK 73949-9719

RUSSELL , SUSAN
RR 1 BOX 93
TEXHOMA OK 73949-9634

SALAZAR , CARI
301 DANIEL XING
LIBERTY HILL TX 78642-4499

SCHWERTNER , THE HONORABLE CHARLES STATE
SENATOR
THE SENATE OF TEXAS DISTRICT 5
PO BOX 12068
AUSTIN TX 78711-2068

SCOTT , BRIAN
300 ABBEY RD
LIBERTY HILL TX 78642-3953

SHIER , BILL
8429 BANGOR BND
AUSTIN TX 78758-7901

SHIFRIN , MARK
PO BOX 1059
LIBERTY HILL TX 78642-1059

SKOVIERA , ELLEN
1110 OAKLANDS DR
ROUND ROCK TX 78681-2702

SMART , NINA
212 KINGFISHER LN
LEANDER TX 78641-2691

SMITH , ROBERT
923 CASHAW LN
CEDAR PARK TX 78613-3241

SMITH , WANDA
900 COUNTY ROAD 236
FLORENCE TX 76527-4835

SPIES , JENNIFER
8907 RUSTIC CV
AUSTIN TX 78717-4853

STANFIELD , MICHELE
100 BUTTERCUP TRL
GEORGETOWN TX 78633-4746

STONEHILL-GARCIA , HEATHER
441 FALCON LN
LEANDER TX 78641-1771

STOUT , TIFFANY
405 LAKE SIDE DR
GEORGETOWN TX 78628-6902

SUAREZ , MS ELIZABETH
2273 COUNTY ROAD 223
FLORENCE TX 76527-4265

SWINT , MR THOMAS L
2809 FRESH SPRING RD
PFLUGERVILLE TX 78660-2381

TAIT , CALVIN
103 RIO ANCHO BLVD
LIBERTY HILL TX 78642-3570

TAYLOR , JEN
193 HOUSEFINCH LOOP
LEANDER TX 78641-1961

THRASH , TIM
865 COUNTY ROAD 208
FLORENCE TX 76527-4865

THURMAN , SANDRA LEE
190 COUNTY ROAD 208
FLORENCE TX 76527-4472

TINSLEY , MASON
11 N BENTON WOODS CIR
THE WOODLANDS TX 77382-1513

TREACY , SUZE
2710 GLENWOOD TRL
CEDAR PARK TX 78613-5128

TUCKER , LARRY
5050 COUNTY ROAD 236
LIBERTY HILL TX 78642-3730

TUCKER , TERESA
5050 COUNTY ROAD 236
LIBERTY HILL TX 78642-3730

TURNER , PAUL KEITH
377 SUNDANCE TRL
LIBERTY HILL TX 78642-3851

ULBRICHT , DAWN
1 HILLWAY DR
ROUND ROCK TX 78664-9623

VAANDRAGER , TRACEY
701 BRIZENDINE RD
LIBERTY HILL TX 78642-3991

VALDEZ , SELENA
204 MOURNING DOVE LN
LEANDER TX 78641-1784

VARNER , BRITTANY D
PO BOX 1532
LIBERTY HILL TX 78642-1532

VARVIR COE , DR MEGAN
1235 RIVER RIDGE RANCH RD
KILLEEN TX 76549-3332

WALLACE , LAURA S
3204 AZTEC FALL CV
AUSTIN TX 78746-1573

WALLER , FRANKIE
80 COUNTY ROAD 208
FLORENCE TX 76527-4484

WARDLAW , HAROLD C
19910 PARK RNCH
SAN ANTONIO TX 78259-1934

WARDLAW , PEGGY
19910 PARK RNCH
SAN ANTONIO TX 78259-1934

WARDLAW , SHAUNA
ED
125 RICHLAND VIEW RD
LIBERTY HILL TX 78642-4041

WARHOL , SUSAN M
1260 COUNTY ROAD 208
FLORENCE TX 76527-4628

WATKINS , JASON
308 BLESSING RANCH RD
LIBERTY HILL TX 78642-4505

WATKINS , NIKKI
51 COUNTY ROAD 153
GEORGETOWN TX 78626-1926

WEAVER , LISA & STEVE
258 COUNTY ROAD 250
GEORGETOWN TX 78633-4042

WEISSE , SCOTT
212 RIETI PKWY
LIBERTY HILL TX 78642-2309

WEMPE , CHARLES
6589 COUNTY ROAD 200
LIBERTY HILL TX 78642-3983

WEMPE , GREG
6589 COUNTY ROAD 200
LIBERTY HILL TX 78642-3983

WHEELLOCK , DAVID
APT 6D
1801 LAVACA ST
AUSTIN TX 78701-1341

WHITE-SHUBERT , SHANNON
3404 CORTINA LN
ROUND ROCK TX 78681-2417

WHITNEY , KIMBERLY
475 COUNTY ROAD 218
FLORENCE TX 76527-4634

WHITTLESEY , SKYLER
220 ARREZO LN
GEORGETOWN TX 78628-7071

WILCOX , MR KEITH
PO BOX 640
FLORENCE TX 76527-0640

WILLIAMS , ASHLEY
APT 136
1616 W DALLAS ST
HOUSTON TX 77019-4770

WILLIAMS , CHARLES R
19926 PARK HOLW
SAN ANTONIO TX 78259-1924

WILLIAMS , ELIZABETH
APT D
616 CASTLE RIDGE RD
AUSTIN TX 78746-5181

WILLIAMS , HAZIEL
19926 PARK HOLW
SAN ANTONIO TX 78259-1924

WILSON , JIM & MARY
278 LAMPASAS CT
KILLEEN TX 76549-4117

WILSON , THE HONORABLE TERRY M STATE
REPRESENTATIVE
TEXAS HOUSE OF REPRESENTATIVES DISTRICT 20
PO BOX 2910
AUSTIN TX 78768-2910

WOOLF , MR ROBERT
305 LA DERA DR
LIBERTY HILL TX 78642-2122

WOOLF , SAMANTHA
305 LA DERA DR
LIBERTY HILL TX 78642-2122

TCEQ AIR QUALITY PERMIT NUMBER 165848

APPLICATION BY	§	BEFORE THE
EXFLUOR RESEARCH CORPORATION	§	TEXAS COMMISSION ON
EXFLUOR RESEARCH	§	ENVIRONMENTAL QUALITY
FLORENCE, WILLIAMSON COUNTY	§	

EXECUTIVE DIRECTOR'S RESPONSE TO PUBLIC COMMENT

The Executive Director of the Texas Commission on Environmental Quality (the commission or TCEQ) files this Response to Public Comment (Response) on the New Source Review Authorization application and Executive Director's preliminary decision.

As required by Title 30 Texas Administrative Code (TAC) § 55.156, before an application is approved, the Executive Director prepares a response to all timely, relevant and material, or significant comments. The Office of Chief Clerk received timely comments from the following persons: Senator Charles Schwertner, Representative Terry M. Wilson, Williamson County Commissioner Cynthia P. Long, Courtney Alcott, Maude McCormick Allen, Sarah Andrews, Nicole Anthony, Federico I. Arce, Mark Baker, Tami Baker, Kristyn Barry, Rebecca Bartels, Robert Lionel Baskind, Stephen David Bauer, Danial Beesley, Don T. Berry, Anne Kathrine Beville, James Blake, Lana Blake, Natalie Blankenbaker, Joy Borjes, Barry L. Bowden, Twila Bowden, Richard Arthur Box, Conor Brace, Whitney Brace, Lindsey Brassfield, Ashley Brooks, Christopher Bunch, Jaime Cadwalader, Alex Campo, Susan G. Carlson, Eileen Carlton, Robert Carwell, Monica Castro, Randa Chapman, Jude P. Coe, Megan Varvir Coe, Vicci Conway, C. D. Cook, Tim Cox, Eric Crop, Grant Cross, Karen Cross, Vasantha Dacha, Corwin E. Davidson, Paul Davidson, Erin Debarbieri, Amy B. Decosmo, Cristin L. Dershem, Mengbing Dong, John G. Dupont, Janet Ellis, Guy Endsley, Lauren Endsley, Morgan Endsley, Tanya Endsley, Franchesca C. Estrada, Jennifer Eyre, Tyler Andrew Eyre, Sheryl Marie Farley, Jeannie Fickel, Anthony Figgins, Jennifer Finkel, Dylan Michael Foley, Amanda Foster, Susanne Fratzke, Elizabeth Ann Friou, Katherine Fuller, Jillian Gabriel, Anna Gandy, Britni Ganze, Brandon Garcia, Kyle Gehrler, Shannon Gehrler, William Patrick George, Richard Grabish, Katlyn Green, Charles Gross, Christi Lachelle Gutierrez, Heinrich Hafner, Denelle Hager, Michelle Loren Hansen, Joanna R. Hayes, Kelley Heath, Chelsey Heil, Glenn Heimbigner, Brenda Hendrickson, James Henley, Jason Hester, Ed Hillis, Alexandra E. Hoeffner, Alexandra Hoeffner, Julia Hollis, Liz Howells, Luann Howland, Rima Huq, Lauren Ice (*on behalf of the North San Gabriel Alliance*), Andrea Jagodzinski, Shawn Jagodzinski, Bineeta Jaiswal, Brian S. Jalufka, Sabrina Jannise, Matthew Johnson, Suzanne Johnson, Tiffany Johnson, Catherine Johnston, Chesley Jones, Nicole Jones, Chris Kalinowski, Molly Kalinowski, Connie Kanetzky, Jerry Kanetzky, Marissa Kanetzky, Erin Kenney, Hemanth Khambhammettu, Karen Kildall, Dolores King, Timothy King, David Kubin, Arun Kumar, Lars Kuslich, Erica Ladden, Ericka Lamanna, Kimm Langston, Lauren Larson, Katrina D. Leal, Gwyneth Lonergan (*on behalf of the North San Gabriel Alliance*), Stephanie Long, Dani Lopez, Jan Love, Babu Madala, Nelson Mak, Alycen Malone, Nichole Manthey, Bryan Martin, John Martin, Sherri Martin, Linda Martinez, Mary Massey, Stacy Mattison, Emma May, Bryce P. McCormick, Charles McCormick, Timothy McDaniel, T. J. McDonald, Kelley McGhie, Ronal Dalton McLoud, Andres Mendez, Noor Agha Mendez, Jannah Mersiovsky, Danny P. Merton, Allison Metcalfe, Karen Milone, Kenneth Mohr, James

Monk, Monica Monk, Connie Moore, Stephanie Ryder Morris, Henry N. Mulvihill, Patricia Mulvihill, Sheila Nardelli, Casey Nash, Cindy Nash, Jake Norman, Kirsten Nottage, Nick Novo, Sarah Novo, Abby Ogletree, Brittney Ortiz, Joe Owen, Rebecca R. Owens, Heather Pacheco, Joe J. Pacheco, Laurie F. Pair, Jerome Palmer, Carvey Lee Parkjer, Tanara Patel, Emily Patterson, Bonnie Pearson, Ron Pearson, Chris Peyton, Renee Peyton, Carla Picinich, Corrina Pointer, Patti Porter, Bryan Primrose, Jackie Primrose, Gina Rahbari, Travis Redding, Ana R. Resto, Bessie Rhodes, James Richardson, Larry A. Ridolfi, David Rivera, Erika Rix, Randal Robbins, Whitney Robbins, Ashton Roberts, James Roberts, Chris Robion, Maria Yolanda Rocke, Mark Rocke, Katy Ross, Charles Russell, Lem Russell, Margaret Russell, Susan Russell, Cari Salazar, Brian Scott, Bill Shier, Mark Shifrin, Ellen Skoviera, Nina Smart, Robert Smith, Wanda Smith, Jennifer Spies, Michele Stanfield, Heather Stonehill-Garcia, Tiffany Stout, Elizabeth Suarez, Thomas L. Swint, Calvin Tait, Jen Taylor, Tim Thrash, Sandra Lee Thurman, Mason Tinsley, Suze Treacy, Larry Tucker, Teresa Tucker, Paul Keith Turner, Tracey Vaandrager, Selena Valdez, Brittany D. Varner, Laura S. Wallace, Frankie Waller, Harold C. Wardlaw, Peggy Wardlaw, Shauna Wardlaw, Susan M. Warhol, Jason Watkins, Nikki Watkins, Scott Weisse, Charles Wempe, Greg Wempe, David Wheelock, Shannon White-Shubert, Kimberly Whitney, Skyler Whittlesey, Keith Wilcox, Ashley Williams, Charles R. Williams, Elizabeth Williams, Haziell Williams, Robert Woolf, and Samantha Woolf. The commenters associated with specific comments relating to a topic are listed in parentheses at the end of each comment. In some instances, a large number of commenters had the same or similar comments and have been associated to their particular comments through the use of groups. The persons attributed to each comment group are listed in Appendix A.

This Response addresses all timely public comments received, whether or not withdrawn. If you need more information about this permit application or the permitting process please call the TCEQ Public Education Program at 1-800-687-4040. General information about the TCEQ can be found at our website at www.tceq.texas.gov.

BACKGROUND

Description of Facility

Exflur Research Corporation (Applicant) has applied to the TCEQ for a New Source Review Authorization under Texas Clean Air Act (TCAA) § 382.0518. This will authorize the construction of a new facility that may emit air contaminants.

This permit will authorize the Applicant to construct the Exflur Research facility. The facility will be located at 1100 County Road 236, Florence, Williamson County. Contaminants authorized under this permit include hydrogen fluorides, carbon monoxide, particulate matter, hazardous air pollutants, nitrogen oxides, and organic compounds.

Procedural Background

Before work is begun on the construction of a new facility that may emit air contaminants, the person planning the construction must obtain a permit from the commission. This permit application is for an initial issuance of Air Quality Permit Number 165848.

The permit application was received on July 9, 2021 and declared administratively complete on July 14, 2021. The Notice of Receipt and Intent to Obtain an Air Quality Permit (first public notice) for this permit application was published in English on July 28, 2021, in the *Williamson County Sun* and in Spanish on July 29, 2021, in *El Mundo*. The Notice of Application and Preliminary Decision for an Air Quality Permit (second public notice) was published on March 6, 2022, in English in the *Williamson County Sun* and in Spanish on March 10, 2022, in *El Mundo*. A public meeting was held on June 16, 2022, in Florence, Texas. The public comment period ended on June 20, 2022. Because this application was received after September 1, 2015, it is subject to the procedural requirements of and rules implementing Senate Bill 709 (84th Legislature, 2015).

COMMENTS AND RESPONSES

COMMENT 1: Public Notice / Comment Period

Commenters expressed concern about public notice of the application. Twila Bowden commented that the facility was being proposed without sufficient public awareness of its nature and possible harm. David Wheelock expressed concern about the ability to locate the draft permit on the TCEQ's website and stated that the record was not complete online. North San Gabriel Alliance expressed concern that the Applicant did not consult nearby landowners before submitting its application and there were details about the technical review process and preparation of the draft permit that were not made available prior to the public meeting. Shannon White-Shubert also expressed concern that existing property owners were not notified when the Applicant purchased the land for the facility.

North San Gabriel Alliance expressed concern that many nearby residents did not learn about the proposed facility until the second notice period. North San Gabriel Alliance also commented that the Applicant did not demonstrate compliance with the notice requirements and should therefore be required to provide the initial notice (first notice of NORI) again in order to reopen the initial comment period. North San Gabriel Alliance and David Wheelock requested that the comment period be extended. North San Gabriel Alliance specifically requested that the comment period be extended for two weeks after the close of the public meeting to allow the public to submit comments after hearing from TCEQ staff and the Applicant's representatives.

(North San Gabriel Alliance, Twila Bowden, David Wheelock, Shannon White-Shubert)

RESPONSE 1: The TCEQ welcomes public participation in the permitting process. The Executive Director instructs applicants to provide public notice, as required by TCEQ rules in Chapter 39 (Public Notice), in accordance with statutory requirements. TCAA § 382.056 requires that an applicant publish a "notice of intent" to obtain a permit

(first public notice) and, in most circumstances, a "notice of preliminary decision" (second public notice). These notices must be published in a newspaper of general circulation in the municipality in which the plant is proposed to be located. If the proposed plant is not located within a municipality, the newspaper should be of general circulation in the municipality nearest to the location or proposed location. As such, individual notice to nearby residents is not required by the statute or TCEQ rules.

The public notice informs the public of its opportunity to make comments and request a public meeting or contested case hearing. The required newspaper notice also invites citizens to request mailed notice on matters of interest by submitting their contact information to the TCEQ Office of the Chief Clerk (OCC). The Executive Director is required to mail notice to persons on mailing lists maintained by the OCC. As stated above, the Notice of Receipt and Intent to Obtain an Air Quality Permit (first public notice) for this permit application was published in English on July 28, 2021, in the *Williamson County Sun* and in Spanish on July 29, 2021, in *El Mundo*. Thus, the initial comment period began on July 28, 2021. However, the first notice inadvertently omitted language denoting that particulate matter (PM) would be authorized to be emitted from the facility. Therefore, the Executive Director determined that the initial notice should be republished to include language concerning PM. A Consolidated Notice of Receipt and Intent to Obtain an Air Quality Permit and Notice of Application and Preliminary Decision for an Air Quality Permit (second public notice) was published on March 6, 2022, in English in the *Williamson County Sun* and in Spanish on March 10, 2022, in *El Mundo*. Therefore, the initial comment period and time period for requesting contested case hearings was also reopened during this time. While commenters have suggested that the Executive Director extend the comment period for an additional two weeks after the close of the public meeting, the Executive Director may only do so for good cause. See 30 TAC § 55.152(a)(8). The permit application, the Executive Director's preliminary decision, the draft permit, and the air quality analysis were made available to the public for inspection as required by TCEQ's rules. The comment period began on July 28, 2021 and ended at the close of the public meeting on June 16, 2022. Accordingly, the Executive Director believes that members of the public had an adequate opportunity to access information about the permit application and has not found good cause for further extending the comment period.

Applicants are required to make a copy of the administratively complete application available for review at a public place in the county in which the plant is proposed to be located. Specifically, 30 TAC § 39.405(g)(1) requires a copy of the administratively complete application to be available for review and copying beginning on the first day of newspaper publication of the first public notice and to remain available during the public comment period. During the second notice period, 30 TAC § 39.405(g)(2) and (3) require a copy of the complete application (including any subsequent revisions) and the ED's preliminary decision, the draft permit, preliminary determination summary, and air quality analysis to be available for public viewing beginning on the first day of the publication of the second public notice. For major source permits (authorized under the Nonattainment New Source Review or Prevention of Significant Deterioration programs), copies of the Executive Director's draft permit and preliminary decision, preliminary determination summary, and air quality analysis are also made available

electronically on the commission's website at the time of publication of the second notice. However, this requirement is not applicable to minor source New Source Review permits, like this one. As described in the notices, the application and associated documents (including the draft permit) were available for viewing and copying at the TCEQ's central office in Austin and at the Eula Hunt Beck Florence Public Library located at 207 East Main Street, Florence, Texas.

To demonstrate compliance with public notice requirements, applicants are required to provide the Office of the Chief Clerk with copies of the published notice and a publisher's affidavit verifying facts related to the publication, including that the newspaper is a paper of general circulation in the municipality in which the proposed facility is located or proposed to be located. The Applicant provided the required forms to the Office of the Chief Clerk.

COMMENT 2: Public Meeting

Conor Brace questioned the chosen location of the public meeting, stating that the Florence High School is a "red-herring location" with little connection to the proposed site. Mr. Brace requested that a "real" public meeting be held in a larger venue to include those populations affected, and specifically requested that residents of Liberty Hill and surrounding areas, Brushy Creek MUD, Georgetown, Round Rock, and the Fort Worth District of the U.S. Army Corps of Engineers be in attendance. Stephanie Ryder Morris commented that both the informal and formal comments should be part of the permit process. Brittany D. Varner expressed concern about the Applicant's answers to certain questions at the public meeting. (North San Gabriel Alliance, Conor Brace, Stephanie Ryder Morris, Brittany D. Varner, Peggy Wardlaw, David Wheelock)

RESPONSE 2: The TCEQ rules require that a public meeting be held if a member of the legislature who represents the general area in which the facility is located requests a public meeting or if the TCEQ Executive Director determines that there is a substantial or significant degree of public interest. Public meetings are open to the public and any member of the public or interested person may attend the meeting. At the request of both citizens and Senator Charles Schwertner and Representative Terry Wilson, a public meeting was held on June 16, 2022, at the Florence High School Cafeteria.

The protocol used in public meetings was explained to the assembled audience in the preliminary remarks prior to the public meeting. Specifically, it was explained that the meeting would consist of two parts, the first being an informal discussion to ask and answer questions while the second part was a formal discussion in which the audience could provide comments that would be recorded for the official public record and responded to in writing. This information is also stated in the meeting notification that was mailed to everyone on the OCC's mailing list prior to the public meeting. The informal portion of the meeting is not designed for the taking of public comment; rather, it provides an opportunity to ask questions of both the applicant and the TCEQ staff. However, to the extent that comments are made during the informal part of the meeting, any person wishing for a written response may re-submit those comments during the formal portion of the public meeting (either orally or in writing). This Response is the written response to all formal comments received during the comment

period for the application, including those received at the public meeting, through the TCEQ's online commenting system, or by mail. A copy of this Response will be sent to each person who submitted a formal comment, a public meeting request, or a request for a contested case hearing or who requested to be on the mailing list for this permit application and provided a mailing address. All timely formal comments received are included in this Response and will be considered before a final decision is reached on the permit application.

COMMENT 3: Sign Posting

North San Gabriel Alliance Commenters questioned if the sign posting requirements were met, specifically questioning whether both English and Spanish signs were posted for the entirety of the public comment period. North San Gabriel Alliance commented that there was no evidence that the Applicant complied with the applicable sign posting rules. North San Gabriel Alliance stated that a local resident who regularly drives past the site never observed the signs posted at the proposed site casting serious doubt on whether the signs were in place for the required time period. In addition, North San Gabriel Alliance expressed doubt that the Applicant's signs complied with the requirements in 30 TAC § 101.601 requiring the public notice to indicate that the application is being processed in an expedited manner.

North San Gabriel Alliance stated that TCEQ's sign posting instructions require applicants to notify the TCEQ of any errors or omissions and to request approval for any necessary changes. In this regard, North San Gabriel Alliance stated that 30 TAC § 101.602 requires that the public notice for expedited applications indicate that the application is being processed in an expedited manner and that given this requirement, the Applicant should have requested changes to the text of the signs. North San Gabriel Alliance stated that the potential failure to comply with the sign posting requirements resulted in harm to local residents because not receiving notice of the application resulted in them not submitting timely requests for a contested case hearing.

RESPONSE 3: When it is determined that public notice is required for air quality applications, applicants must ensure that signs regarding the requested permit action are posted as required by 30 TAC § 39.604 (Sign-Posting). The sign(s) must declare the filing of an application for a permit and state the manner in which the commission may be contacted for further information. The signs must consist of dark lettering on a white background and must be no smaller than 18 inches by 28 inches and all lettering must be no less than 1½ inches in size and block printed capital lettering. In addition, 30 TAC § 39.604 requires that each sign placed at the site be located within ten feet of every property line paralleling a public highway, street, or road. Signs must also be visible from the street and spaced at not more than 1,500-foot intervals. A minimum of one sign, but no more than three signs, are required along any property line paralleling a public highway, street, or road. In cases where notice is required to be published in an alternative language, applicants must also post signs in the applicable alternative language. Additionally, the applicant must provide written verification to the commission that the sign-posting was conducted in accordance with TCEQ rules.

30 TAC § 101.602 provides that when existing public notice requirements must be met and the applicant pays the expedited permitting surcharge, the applicable public notice must indicate that the application is being processed in an expedited manner. The term "public notice" in this rule refers to the newspaper publications discussed in Response 1. These notices (both first and second notice) contained the language required by section 101.602 indicating that the application was being processed in an expedited manner. However, the signs required to be posted by 30 TAC § 39.604, are not required to contain similar language.

The Applicant provided the required verification to the Office of the Chief Clerk verifying that signs were posted at the proposed site in accordance with the TCEQ rules. In addition, at the request of the Executive Director's staff, the Applicant also provided photos containing EXIF data which demonstrated that the signs were posted on the dates and at the location required by the TCEQ rules.

COMMENT 4: Air Quality Permit

Elizabeth Ann Friou questioned why the Applicant needs a permit if the emissions are not toxic or dangerous.

RESPONSE 4: The TCAA § 382.0518 provides that before work begins on the construction of a new facility or a modification of an existing facility that may emit air contaminants, the person planning the construction or modification must obtain a permit or permit amendment from the commission. Air contaminant is defined in the TCAA § 382.003(2), to include "particulate matter, radioactive material, dust fumes, gas, mist, smoke, vapor, or odor, including any combination of those items, produced by processes other than natural." Because the proposed facility will emit air contaminants, a permit must be obtained prior to the start of construction.

COMMENT 5: Air Quality / Health Effects

Commenters expressed concern about the effect of the emissions from the proposed project on the air quality and health of people, particularly sensitive populations such as the elderly, children, and people with existing medical conditions. North San Gabriel Alliance expressed concern that the application failed to show that the facility would not negatively impact air quality, human health, the environment, or property in the vicinity of the site. Commenters express specific concern regarding emissions of hydrogen fluoride (HF) and fluorine. Commenters expressed concern that the proposed project would cause negative health effects, including cancer. Group C commented that hydrogen fluoride is an extremely dangerous chemical that eats skin and lung tissue and stated that this chemical should never be released into the air. Heather Pacheco stated that the area does not have buildings or structures to block wind and expressed concern that the wind would carry toxic chemicals that would subsequently impact the community.

North San Gabriel Alliance expressed concern that the application failed to show that the facility would not negatively impact air quality, human health, the environment, or property in the vicinity of the site. North San Gabriel Alliance also expressed concern that the application did not consider the potential for cumulative impacts and that it

was not demonstrated that the TCEQ applied ESLs. Specifically, North San Gabriel Alliance stated that the "ESL thresholds" indicate that nearby residences will be impacted. Heather Pacheco expressed concern that winds would carry toxic chemicals to the surrounding area. Stephanie Ryder Morris commented that the TCEQ's standards are not strict enough.

Several commenters expressed concern about polyfluoroalkyl substances (PFAS) and stated these are known as "forever chemicals" because they do not degrade in nature. Bryce P. McCormick commented that perfluorooctanoic acid, which he stated is listed on the product information page of the Applicant's website, was recently identified in an EPA health advisory as a PFAS chemical. Jennifer Spies expressed concern regarding the potential health impacts of PFAS chemicals in the air and asked to what standards the Applicant is being held for these contaminants and how those standards were developed. Ms. Spies expressed concern about the potential for PFAS discharges into nearby water bodies and commented that PFAS could be spread up to 25 miles away and questioned whether the model accounted for impacts more than a few miles from the plant. Ms. Spies also questioned whether the model would be re-evaluated if EPA began regulating PFAS chemicals. In addition, Ms. Spies questioned whether the Applicant would control and monitor for these compounds and what specific method would be used for monitoring.

(County Commissioner Cynthia P. Long, North San Gabriel Alliance, Group A, Group C, Maude Allen, Mark Baker, Kristyn Barry, Stephen Bauer, Stephen David Bauer, Danial Beesley, Don T. Berry, Joy Borjes, Twila Bowden, Richard Arthur Box, Conor Brace, Whitney Brace, Lindsey Brassfield, Ashley Brooks, Alex Campo, Susan G. Carlson, Robert Carwell, Monica Castro, Megan Varvir Coe, C. D. Cook, Erin Debarbieri, Cristin L. Dershem, Jennifer Eyre, Tyler Andrew Eyre, Dylan Michael Foley, Susanne Fratzke, Elizabeth Ann Friou, Jillian Gabriel, Shannon Gehrer, Richard Grabish, Charles Gross, Joanna R. Hayes, Kelley Heath, Brenda Hendrickson, Ed Hillis, Liz Howells, Luann Howland, Andrea Jagodzinski, Shawn Jagodzinski, Matthew Johnson, Suzanne Johnson, Catherine Johnston, Chris Kalinowski, Molly Kalinowski, Lars Kuslich, Katrina D. Leal, Jan Love, Babu Madala, Nelson Mak, Alycen Malone, John Martin, Sherri Martin, Linda Martinez, Mary Massey, Bryce P. McCormick, Charles McCormick, Timothy McDaniel, Andres Mendez, Noor Agha Mendez, Jannah Mersiovsky, Karen Milone, Kenneth Mohr, Stephanie Ryder Morris, Casy Nash, Cindy Nash, Nick Novo, Sarah Novo, Abby Ogletree, Brittney Ortiz, Joe Owen, Heather Pacheco, Emily Patterson, Carla Picinich, Corrina Pointer, Bryan primrose, Jackie Primrose, Bessie Rhodes, James Richardson, Erika Rix, Randal Robbins, Whitney Robbins, Chris Robion, Maria Yolanda Rocke, Mark Rocke, Bill Shier, Mark Shifrin, Robert Smith, Jennifer Spies, Heather Stonehill, Heather Stonehill-Garcia, Calvin Tait, Sandra Lee Thurman, Tim Thrash, Suze Treacy, Larry Tucker, Teresa Tucker, Paul Keith Turner, Brittany D. Varner, Laura S. Wallace, Frankie Waller, Peggy Wardlaw, Susan M. Warhol, Jason Watkins, Nikki Watkins, Scott Weisse, Charles Gregory Wempe, Shannon White-Shubert, Keith Wilcox, Charles William)

RESPONSE 5: The Executive Director is required to review permit applications to ensure the emissions proposed to be authorized will be protective of human health and the environment. For this type of air permit application, potential impacts to

human health and welfare or the environment are determined by comparing the predicted concentration of air contaminants to appropriate state and federal standards and guidelines. These standards and guidelines include the National Ambient Air Quality Standards (NAAQS), TCEQ Effects Screening Levels (ESLs), and TCEQ rules. The Applicant proposed to authorize a new specialty manufacturing facility that will produce a variety of perfluorocarbons. The permit will authorize emissions of CO, NO_x, PM₁₀, PM_{2.5}, organic compounds, hydrogen fluorides, and hazardous air pollutants. As described in detail below, the Executive Director determined that the emissions authorized by this permit will be protective of both human health and welfare and the environment.

NAAQS Analysis

The U.S. Environmental Protection Agency (EPA) created and continues to evaluate the NAAQS, which include both primary and secondary standards, for pollutants considered harmful to public health and the environment.¹ Primary standards protect public health, including sensitive members of the population such as children, the elderly, and those individuals with preexisting health conditions. Secondary NAAQS protect public welfare and the environment, including animals, crops, vegetation, visibility, and buildings, from any known or anticipated adverse effects from air contaminants. The EPA has set NAAQS for criteria pollutants, which include carbon monoxide (CO), lead (Pb), nitrogen dioxide (NO₂), ozone (O₃), sulfur dioxide (SO₂), particulate matter less than or equal to 10 microns in aerodynamic diameter (PM₁₀), and PM less than or equal to 2.5 microns in aerodynamic diameter (PM_{2.5}).

The likelihood of whether adverse health effects caused by emissions from the facility could occur in members of the general public, including sensitive subgroups such as children, the elderly, or people with existing respiratory conditions, was determined by comparing the facility's maximum predicted air dispersion modeling concentrations to the relevant state and federal standards and ESLs. TCEQ staff used modeling results to verify that predicted ground-level concentrations from the proposed facility are not likely to adversely impact public health and welfare. The overall evaluation process provides a conservative prediction that is protective of public health. The modeling predictions were reviewed by the TCEQ Air Dispersion Modeling Team, and the modeling analysis was determined to be acceptable. The Applicant used the AERMOD modeling system to provide a reasonable worst-case representation of potential impacts from the proposed emissions on the area surrounding the facility. See Response 7 for additional information concerning the modeling and Response 13 concerning emissions calculations.

The Applicant conducted a NAAQS analysis for CO, NO₂, PM₁₀, and PM_{2.5}. The first step of the NAAQS analysis is to compare the maximum predicted concentrations against the established de minimis level. Maximum predicted concentrations (GLCmax²) below the de minimis level are considered to be so low that they do not require further NAAQS analysis. Table 1 contains the results of the de minimis analysis.

¹ 40 C.F.R. § 50.2

² The GLCmax is the maximum ground level concentration predicted by the modeling.

Table 1. Modeling Results for De Minimis Review

Pollutant	Averaging Time	GLCmax ($\mu\text{g}/\text{m}^3$)	De Minimis ($\mu\text{g}/\text{m}^3$)
NO ₂	1-hr	7	7.5
NO ₂	Annual	0.1	1
CO	1-hr	10	2000
CO	8-hr	3	500
PM ₁₀	24-hr	0.1	5
PM _{2.5}	24-hr	0.1	1.2
PM _{2.5}	Annual	0.01	0.2

The NAAQS analysis results demonstrated that each criteria pollutant proposed to be authorized is below the de minimis level for each pollutant, should not cause or contribute to violation of the NAAQS, and will be protective of human health and the environment.

Health Effects Analysis

To evaluate potential impacts of non-criteria pollutants, a health effects analysis was performed. ESLs are specific guideline concentrations used in TCEQ's evaluation of certain non-criteria pollutants. These guidelines are derived by the TCEQ's Toxicology Division and are based on a pollutant's potential to cause adverse health effects, odor nuisances, and effects on vegetation. Health-based ESLs are set below levels reported to produce adverse health effects and are set to protect the general public, including sensitive subgroups such as children, the elderly, or people with existing respiratory conditions. The TCEQ's Toxicology Division specifically considers the possibility of cumulative and aggregate exposure when developing the ESL values that are used in air permitting, creating an additional margin of safety that accounts for potential cumulative and aggregate impacts. Adverse health or welfare effects are not expected to occur if the air concentration of a pollutant is below its respective ESL. If an air concentration of a pollutant is above the screening level, it is not necessarily indicative that an adverse effect will occur, but rather that further evaluation is warranted.

The health effects analysis is performed using the TCEQ guidance Air Permit Reviewer Reference Guide - APDG 5874 - Modeling and Effects Review Applicability (MERA)³ process. The MERA provides a step-by-step process to evaluate the potential impacts of non-criteria pollutants which are evaluated against the ESL for each chemical species. The initial steps are simple and conservative, and as the review progresses through the process, the steps require more detail and result in a more refined analysis. If a contaminant meets the criteria of a step, the review of human health and welfare effects for that chemical species is complete and is said to "fall out" of the MERA process at that step because it is protective of human health and welfare. The results of the health effects analysis are included in Table 2 below.

³ See Air Permit Reviewer Reference Guide - APDG 5874 guidance document.

Table 2. Minor Site-Wide Health Effects Modeling Results

Pollutant	CAS#	Averaging Time	GLCmax (µg/m ³)	ESL (µg/m ³)
hydrogen fluoride	7664-39-3	1-hr	6	18
hydrogen fluoride For air permit reviews in agricultural areas	7664-39-3	1-hr	3.9	3
hydrogen fluoride For air permit reviews in agricultural areas with cattle	7664-39-3	Annual	0.3	0.75
fluorine	7782-41-4	1-hr	3.9	2
perfluoroheptane	335-57-9	1-hr	22	20000
methanol	67-56-1	1-hr	38	3900
perfluorooctanoic acid and its inorganic salts	335-67-1	1-hr	<0.01	0.05
bromine	7726-95-6	1-hr	5	7
hydrogen chloride	7647-01-0	1-hr	4	190
hydrogen chloride	7647-01-0	Annual	0.1	7.9
carbon tetrafluoride	75-73-0	1-hr	154	18000
Perfluoro (bis-2-chloroethoxy methane)	N/A	1-hr	7	200
Perfluorodecalin	306-94-5	1-hr	22	200
polymers of chlorotrifluoroethylene (PCTFE)	9002-83-9	1-hr	17	50
carbonyl fluoride For air permit reviews in agricultural areas with cattle	353-50-4	Annual	0.03	0.71
trifluoroacetic acid For air permit reviews in agricultural areas with cattle	76-05-1	Annual	0.03	0.71

As demonstrated in Table 2, with the exception of hydrogen fluoride and fluorine, all non-criteria pollutants proposed to be authorized were below their respective ESLs. Thus, these pollutants satisfied the MERA criteria and would not be expected to cause adverse health effects. As described above, if an air concentration of a pollutant is above the ESL, it is not indicative of an adverse effect but rather that further evaluation is warranted. The TCEQ's Toxicology Division conducted an analysis of hydrogen fluoride and fluorine, in order to evaluate potential exposures and assess human health risks to the public. The Toxicology Division determined that the potential

impacts are acceptable given the conservative nature of both the ESLs and the emissions estimates.

In summary, the air contaminants proposed to be authorized in this permit application were evaluated in accordance with applicable federal and state rules and regulations. It was determined that, based on the potential predicted concentrations reviewed by the Executive Director's staff, adverse short- or long-term health effects for the general public, including sensitive subgroups such as children, the elderly, or those individuals with preexisting health conditions, animal life, crops, and vegetation are not expected as a result of exposure to the proposed emissions.

COMMENT 6: Environmental Concerns/ Flora and Fauna/ Endangered Species

Commenters expressed concern about the effect of the proposed project on flora, fauna and the surrounding environment, including the impacts on soil, trees, farmlands, and animals, including livestock and pets. Shannon White-Shubert commented that the area has unique fertile soil. North San Gabriel Alliance stated that the application failed to show that the proposed facility will not negatively affect plants and animals, including livestock and wildlife, and the local environment in the vicinity of the site. North San Gabriel Alliance also expressed concern that the application did not provide information about nearby livestock or their forage grasses and stated that the application should be returned for evaluation of the correct information. In addition, North San Gabriel Alliance also expressed concern that the area contains limestone features on other properties that could serve as habitat for endangered species and commented that the site should be analyzed for the presence of threatened or endangered species.

(North San Gabriel Alliance, Group A, Group C, Group D, Maude Allen, Federico I. Arce, Mark Baker, Tami Baker, Kristyn Barry, Franchesca C. Estrada Danial Beesley, Joy Borjes, Twila Bowden, Alex Campo, Susan G. Carlson, Robert Carwell, Monica Castro, Karen Cross, Jennifer Eyre, Tyler Andrew Eyre, Sheryl Marie Farley, Anthony Figgins, Amanda Foster, Elizabeth Ann Friou, Jillian Gabriel, Shannon Gehrler, Richard Grabish, Joanna R. Hayes, Liz Howells, Shawn Jagodzinski, Matthew Johnson, Suzanne Johnson, Chris Kalinowski, Molly Kalinowski, Lars Kuslich, Timothy McDaniel Katrina D. Leal, Babu Madala, Nelson Mak, Alycen Malone, Linda Martinez, Bryce P. McCormick, Charles McCormick, Andres Mendez, Noor Agha Mendez, Stephanie Ryder Morris, Nick Novo, Sarah Novo, Brittney Ortiz, Joe Owen, Rebecca R. Owens, Heather Pacheco, Corrina Pointer, Bryan Primrose, Jackie Primrose, Travis Redding, Bessie Rhodes, James Richardson, Erika Rix, Twila Bowden Randal Robbins, Chris Robion, Maria Yolanda Rocke, Mark Rocke, Robert Smith, Calvin Tait, Tim Thrash, Laura S. Wallace, Nikki Watkins, Charles Gregory Wempe, Shannon White-Shubert, Keith Wilcox, Elizabeth Williams, Haziell Williams)

RESPONSE 6: As described above, the secondary NAAQS are those the EPA Administrator determines are necessary to protect public welfare and the environment, including animals, crops, vegetation, visibility, and structures, from any known or anticipated adverse effects associated with the presence of a contaminant in the ambient air. The TCEQ's jurisdiction for air quality permitting does not authorize the

commission to consider effects on plants or animals outside of an evaluation of the secondary NAAQS. Accordingly, applicants for air quality permits are not required to submit information concerning nearby livestock or forage grasses. However, because the emissions from this facility should not cause an exceedance of the NAAQS, the emissions are not expected to adversely impact land, livestock, wildlife, crops, or visibility, nor should emissions interfere with the use and enjoyment of surrounding land or water. In addition, the ESLs for hydrogen fluoride, carbonyl fluoride, and trifluoroacetic acid were developed specifically to be protective of cattle in addition to human health. Permit holders must also comply with 30 TAC § 101.4, which prohibits the discharge of contaminants which may be injurious to, or adversely affect, animal life.

Compliance with rules and regulations regarding endangered species is handled at the state level by the Texas Parks and Wildlife Department and at the federal level by the United States Fish and Wildlife Service. It is incumbent upon an applicant to request and acquire any additional authorizations that may be required under state or federal law. However, if operated in accordance with the requirements of this permit, adverse impacts from the proposed facility are not expected.

COMMENT 7: Air Dispersion Modeling / Evaluation of the Surrounding Area

Commenters expressed concern that the review of the application did not adequately consider potential impacts on the surrounding area or nearby residences. North San Gabriel Alliance stated that the application did not demonstrate that an adequate site review was conducted for the property. In addition, North San Gabriel Alliance stated it was not clear that the air modeling included and properly evaluated all applicable emissions, such as fugitive emissions or MSS activities. North San Gabriel Alliance expressed concern that several nearby residents were not identified in the application and stated that the ESLs indicated that those residents would be impacted. North San Gabriel Alliance commented that the application should be returned so that correct information can be submitted and potential impacts on residences not identified in the application can be evaluated. David Wheelock commented that in the files he found on TCEQ's website, one appears to be a request for information from TCEQ staff asking the Applicant to provide justification for its use of the non-industrial location associated with the analysis. Mr. Wheelock stated that he was not able to find anything in the online records indicating the Applicant responded to this request for information.

North San Gabriel Alliance commented that the application contained factually incorrect information about the surrounding area. Specifically, North San Gabriel Alliance stated that the application states that the site is surrounded to the West, North, and South by forested land and possible agricultural land to the East. Conor Brace commented the statement in the application indicating that the proposed location was in the Florence Area or northwest Williamson County was dishonest in its suggestion that the site was in the middle of nowhere. Mr. Brace requested that TCEQ put down outdated maps and explore the area for itself.

(North San Gabriel Alliance, Conor Brace, David Wheelock)

RESPONSE 7: As described above, appropriate site-specific air dispersion modeling was performed for this application. The Applicant used the EPA-approved AERMOD air dispersion modeling program to provide an estimate of the worst-case potential impacts on the area surrounding the proposed facility. The modeling procedures, methodology, predictions, and results were audited by the TCEQ's Air Dispersion Modeling Team (ADMT) and determined to be acceptable. The ADMT review was conducted following the procedures outlined in TCEQ Publication APDG 6232, Air Quality Modeling Guidelines.⁴

The request to justify the use of the non-industrial location chosen for the site-wide difluorine/fluorine analysis was made prior to the Applicant's submittal of the final modeling analysis. The ADMT conducts a preliminary review of the Electronic Modeling Evaluation Workbook to evaluate general proposals for modeling and to give feedback on items which should be addressed in the final modeling evaluation. The Applicant appropriately addressed this issue in its final modeling submittal and correctly accounted for the non-industrial location of the proposed facility.

The evaluation incorporated all emissions proposed to be authorized as represented in the permit application. The modeling considered the potential effects of buildings (or lack thereof) on the dispersion of emissions. In addition, the model incorporated a full year of meteorological data as a means of predicting dispersion given the different weather patterns expected at the site. While daily weather conditions can vary within a given year, the worst-case meteorological conditions that occur during a given year are typically the same as other years. Thus, the meteorological data included sufficient data to capture the worst-case meteorological conditions, which would include the local prevailing winds.

Applicants are required to provide a current area map and plot plan with their application materials. The area map must include a true north arrow, an accurate graduated scale, show the entire plant property, the location of the property relative to prominent geographical features, and a 3,000-foot radius from the property boundary. The plot plan must clearly show a scale, contain a north arrow, all property lines, emission points, buildings, tanks, process vessels, other process equipment, and include two benchmark locations. The area map and plot plan submitted with the application were sufficiently detailed and representative of the surrounding area for the impact analysis. In addition, the ADMT reviewed aerial photography (Google Earth) to verify the representation of the surrounding area in the area map.

In addition, in its modeling analysis, the Applicant placed receptors around the property line at 25-meter intervals and extending out 150-250 meters in each direction. The receptor grid was then extended out to a distance of 1000-1500 meters in each direction with receptor spacing of 100 meters. The ADMT determined that the grid modeled was sufficient in density and spatial coverage to capture representative maximum ground-level concentrations. As stated in Response 5, based on the Executive Director's staff review, adverse health effects are not expected as a result of proposed emission rates associated with this project.

⁴ See Air Quality Modeling Guidelines - APDG 6232

COMMENT 8: Environmental Impact Study

Shannon White-Shubert commented that the Applicant indicated in a town-hall meeting that it had conducted an environmental study. Ms. White-Shubert expressed concern that this study has not been disclosed to the public.

RESPONSE 8: Environmental Assessments and Environmental Impact Statements (EIS) are a specific requirement for federal agencies under the National Environmental Policy Act (NEPA). An EIS is not required for state actions such as this permit. Thus, the TCEQ cannot require an applicant to submit an EIS or make it available to the public. However, both the TCAA and the TCEQ rules provide for an extensive review of the application to ensure that emissions from the proposed facility will not violate the NAAQS and will not be expected to adversely affect human health or the environment. This review is discussed in more detail in Response 5.

COMMENT 9: Odors

North San Gabriel Alliance expressed concern that its members would be endangered by foul odors from the proposed facility.

RESPONSE 9: The potential for odor nuisance is reviewed through the use of ESLs. In this case, the particular ESLs considered in the review were health-based ESLs which are generally more restrictive than odor-based ESLs. As discussed in Response 5, the health effects review compared the emissions proposed to be authorized to the ESLs and determined that the impacts were acceptable.

While nuisance conditions are not expected if the facility is operated in compliance with the terms of the permit, operators must also comply with 30 TAC § 101.4, which prohibits a person from creating or maintaining a condition of nuisance. Specifically, the rules states "[n]o person shall discharge from any source whatsoever one or more air contaminants or combinations thereof, in such concentration and of such duration as are or may tend to be injurious to or to adversely affect human health or welfare, animal life, vegetation, or property, or as to interfere with the normal use and enjoyment of animal life, vegetation, or property."

Individuals are encouraged to report any concerns about suspected noncompliance with the terms of any permit or other environmental regulation by contacting the TCEQ Austin Regional Office at 512-339-2929 or by calling the 24-hour toll-free Environmental Complaints Hotline at 1-888-777-3186. The TCEQ reviews all complaints received. If the facility is found to be out of compliance with the terms and conditions of the permit, it may be subject to investigation and possible enforcement action.

COMMENT 10: Water Concerns

Commenters expressed concern that the project would negatively impact water resources in the surrounding area, including the Edwards Aquifer. Commenters expressed concern regarding water contamination due to potential spills, byproducts, and discharges from the facility. In addition, many commenters expressed concern that the Applicant would discharge contaminants or chemical waste into the North

Fork San Gabriel River. North San Gabriel Alliance commented that the Applicant was not able to obtain an Edwards Aquifer contributing zone permit and that the Air Permits Division should consider the lack of the contributing zone permit in its review of the air application. Cynthia P. Long expressed concern that the facility will overtax the water supply. John Martin asked what the projected water usage is for the facility and what limits on water usage will be imposed.

(County Commissioner Cynthia P. Long, North San Gabriel Alliance, Group A, Group C, Federico I. Arce, Mark Baker, Kristyn Barry, Stephen David Bauer, Danial Beesley, Don T. Berry, Anne Kathrine Beville, Joy Borjes, Barry L. Bowden, Arthur Richard Box, Richard Arthur Box, Conor Brace, Lindsey Brassfield, Ashley Brooks, Susan G. Carlson, Robert Carwell, Monica Castro, C. D. Cook, Grant Cross, Karen Cross, Paul Davidson, Cristin L. Dershem, Franchesca C. Estrada, Jennifer Eyre, Tyler Andrew Eyre, Sheryl Marie Farley, Amanda Foster, Elizabeth Ann Friou, Jillian Gabriel, Twila Bowden Richard Grabish, Charles Gross, Christi Lachelle Gutierrez, Ed Hillis, Luann Howland, Shawn Jagodzinski, Matthew Johnson, Catherine Johnston, Ericka Lamanna, Katrina D. Leal, Nelson Mak, Alycen Malone, John Martin, Mary Massey, Bryce P. McCormick, Timothy McDaniel, Ronal Dalton McLoud, Andres Mendez, Noor Agha Mendez, Allison Metcalfe, Stephanie Ryder Morris, Casy Nash, Cindy Nash, Nick Novo, Sarah Novo, Joe Owen, Rebecca R. Owens, Heather Pacheco, Tanara Patel, Emily Patterson, Carla Picinich, Bryan Primrose, Jackie Primrose, James Richardson, Erika Rix, Randal Robbins, Whitney Robbins, Mark Shifrin, Robert Smith, Jennifer Spies, Heather Stonehill, Calvin Tait, Sandra Lee Thurman, Suze Treacy, Teresa Tucker, Paul Keith Turner, Brittany D. Varner, Laura S. Wallace, Frankie Waller, Peggy Wardlaw, Susan M. Warhol, Jason Watkins, Nikki Watkins, Charles Gregory Wempe, Shannon White-Shubert, Skyler Whittlesey, Keith Wilcox, Haziel Williams)

RESPONSE 10: Although the TCEQ is responsible for the environmental protection of air and water as well as the safe management of waste, this proposed permit will regulate the control and abatement of air emissions only. Therefore, issues regarding water use, water quality, or potential discharges are not within the scope of this review. This permit does not regulate water use or authorize the discharge of pollution into a body of water.

The issuance of an air quality permit does not negate the responsibility of an applicant to apply for any additionally required authorizations before operating a plant. It is the Applicant's responsibility to secure any authorizations necessary for operation of the proposed facility, and accordingly, the Applicant may be required to apply for separate authorizations regulating water use or water quality at the proposed site.

Individuals are encouraged to report environmental concerns, including water quality issues, or suspected noncompliance with the terms of any permit or other environmental regulation by contacting the TCEQ Austin Regional Office at 512-339-2929 or by calling the 24-hour toll-free Environmental Complaints Hotline at 1-888-777-3186. The TCEQ evaluates all complaints received. If the plant is found to be out of compliance with the terms and conditions of the permit, the Applicant may be subject to enforcement action.

COMMENT 11: On-Site Chemical Storage

Peggy Wardlaw questioned how the Applicant would store chemicals on site and questioned whether the Applicant accurately represented the type and location of on-site chemical storage. Specifically, Ms. Wardlaw expressed concern that the Applicant indicated it would move chemicals onsite and that process had not been considered during the review of the application. Jackie Primrose asked if there will be limitations on the quantities of each chemical that is on the property at one time so that if there is an accident or natural disaster there is an attempt to minimize the impact.

(Jackie Primrose, Peggy Wardlaw)

RESPONSE 11: The Applicant represented that there will be multiple buildings, including a storage building, that will contain materials stored in sealed drums. The storage of chemicals in sealed containers which do not have the potential to emit pollutants into the air are outside of the jurisdiction of the air permit.

The Applicant submitted a Table 2 Material Balance. The Material Balance representation accounts for all materials entering and leaving the facility at maximum operating conditions. In accordance with 30 TAC § 116.116, an applicant is bound by its representations in the application and those representations become an enforceable part of the permit. *See* Response 22 concerning emissions events, spills, and emergency response.

COMMENT 12: Best Available Control Technology (BACT)

North San Gabriel Alliance expressed concern that the application did not include an adequate BACT analysis. North San Gabriel Alliance expressed specific concern that the Applicant had withdrawn its application for an Edward Aquifer Contributing Zone Plan because it could not meet applicable requirements and stated this demonstrates the application did not propose BACT. Susanne Fratzke asked if the Applicant would consider installing controls beyond BACT. (North San Gabriel Alliance, Susanne Fratzke)

RESPONSE 12: The TCAA and TCEQ rules require an evaluation of air quality permit applications to determine whether adverse effects to public health, general welfare, or physical property are expected to result from a facility's proposed emissions. As part of the evaluation of applications for new or amended permits, the permit reviewer audits all sources of air contaminants at the proposed facility and assures that the facility will be using the best available control technology (BACT) applicable for the sources and types of contaminants emitted. BACT is based upon control measures that are designed to minimize the level of emissions from specific sources at a facility. Applying BACT results in requiring technology that best controls air emissions with consideration given to the technical practicability and economic reasonableness of reducing or eliminating emissions. *See* TCAA § 382.0518; 30 TAC § 116.111. BACT may be numerical limitations, the use of an add-on control technology, design considerations, the implementation of work practices, or operational limitations. The Applicant represented that BACT will be used for the proposed new sources.

The contaminants authorized by this permitting action include hydrogen fluorides,

carbon monoxide, hazardous air pollutants, particulate matter, nitrogen oxides and organic compounds. The primary control measures applied to this facility are the use of thermal oxidizers, which will be required to achieve a 99.9 percent destruction efficiency. Absorbers will also be used upstream of the thermal oxidizers to reduce the amount of emissions vented to the thermal oxidizers and to recycle material back to the process. The Applicant also proposed the use of the 28AVO program for monitoring of components in hydrogen fluoride (HF) service. The permit reviewer evaluated the proposed BACT and confirmed it to be acceptable.

COMMENT 13: Emissions Calculations

North San Gabriel Alliance commented that the application did not demonstrate that the emissions calculations were conducted properly. North San Gabriel Alliance also stated that it was not clear whether the emission factors relied on were proper or if the data was representative of site-specific conditions. North San Gabriel Alliance also stated it was not clear whether the emissions calculations included MSS activities.

RESPONSE 13: The Applicant represented the appropriate methodologies to control and minimize emissions and utilized corresponding control efficiencies when calculating the emission rates. As provided in 30 TAC § 116.116(a), the Applicant is bound by these representations, including the represented performance characteristics of the control equipment. In addition, the permit holder must operate within the limits of the permit, including the emission limits as listed in the Maximum Allowable Emissions Rate Table (MAERT).

Emissions calculations for the proposed facility were determined utilizing vendor data, TCEQ guidance, and EPA emission factors. The EPA has documented a list of emission factors that can be used to calculate the estimated emissions from many sources, including sources proposed to be authorized in this permit. These emission factors are provided in EPA's AP-42 Compilation of Air Emission Factors (AP-42) guidance. The TCEQ ensures the conservative nature of these calculations by evaluating each emission point at the maximum production rates. The resulting emission rates are used as one of the inputs to an EPA-approved air dispersion modeling program that determines the predicted emission concentration for each air contaminant at locations surrounding the proposed facility.

The emission rates from the exhaust gas vent systems were estimated based on vendor supplied data for the air contaminant removal efficiency of the thermal oxidizers, AP-42 emission factors, and calculated air contaminant input rates to the thermal oxidizers. The removal efficiency of the process scrubber was conservatively assumed to be zero. Emission rates from units that are not vented to the exhaust gas vent systems were estimated based on the physical properties of the chemicals and facility operating parameters. Fugitive emission rate estimates were calculated using TCEQ's common fugitive calculation workbook, in accordance with the TCEQ's Air Permit Technical Guidance for Chemical Sources: Fugitive Guidance - APDG 6422 (June 2018). The fugitive emission stream weight percentages authorized in the permit represent the maximum expected concentrations of each chemical under any operation condition.

COMMENT 14: Chemical Flexibility

North San Gabriel Alliance commented that the draft permit should not allow chemical flexibility.

RESPONSE 14: The TCEQ offers regulated entities chemical flexibility by including a set of conditions that contain a procedure for the permit holder to authorize new chemicals. This method is limited to new chemicals that serve the same basic function as the chemicals previously authorized by the permit and that will emit only from currently authorized and previously reviewed emissions points. Unit impact multipliers obtained from the impacts evaluation are identified in the chemical flexibility conditions and the permit holder must use the evaluation procedure outlined in the conditions to determine whether both the short- and long-term impacts are acceptable. The new chemical may be authorized only if it meets the requirements of the chemical flexibility conditions.

COMMENT 15: Hours of Operation

North San Gabriel Alliance expressed concern that the application authorizes the site to operate 24 hours per day, 365 days per year, further stating that this schedule is not protective of public health or the environment.

RESPONSE 15: TCEQ has not been delegated the authority to regulate the hours of operations of a facility or site if the permit review demonstrates all applicable federal and state regulations are met. Accordingly, TCEQ cannot limit the hours of operation unless an emission rate is dependent on a limit on operational hours or there are issues associated with the air quality analysis that require the limitation. The Applicant represented operations up to 8,760 hours per year. Despite the representation of 8,760 hours per year, which is typically done for conservatism and flexibility in operations, facilities typically do not operate that many hours per year. As described in Response 5, based on the Executive Director's staff review, it is not expected that existing health conditions will worsen, or that there will be adverse health effects on the general public, sensitive subgroups, or the public welfare and the environment as a result of the emissions proposed to be authorized.

COMMENT 16: Monitoring and Recordkeeping

Commenters expressed concern about the monitoring requirements contained in the draft permit. Susanne Fratzke questioned how the Applicant would demonstrate compliance with the permit. Janet Ellis questioned what the air quality and groundwater reporting requirements are for this facility. North San Gabriel Alliance expressed concern that the monitoring and recordkeeping requirements in the draft permit will not ensure compliance with all rules and requirements. Charles McCormick commented that the Applicant should be required to install an exhaust monitoring system that measures and records emissions in real time and that the results should be available to the public on the internet. Mr. McCormick stated that the monitoring system should include threshold alarms that trigger sirens and alert emergency services and expressed concern that without this system, local residents will be unable to promptly recognize emergency conditions and know when to evacuate.

(North San Gabriel Alliance, Janet Ellis, Susanne Fratzke, Charles McCormick)

RESPONSE 16: Special conditions have been included as part of the draft permit to ensure the Applicant can demonstrate compliance with the emission limitations set forth in the permit. Emissions from the thermal oxidizer and scrubber system, will be required to be monitored through temperature monitoring of the thermal oxidizer firebox exhaust temperature and the oxygen concentration. The fugitive emissions from components in hydrogen fluoride service will be monitored with the 28AVO program. The permit holder is also required to maintain records to demonstrate compliance, including the monitoring listed above. Records must be made available upon request to representatives of the TCEQ, EPA, or any local air pollution control program having jurisdiction. The Regional Office may perform investigations of the facility which may include an inspection of the site including all equipment, control devices, monitors, and a review of all calculations and required recordkeeping.

In addition, the draft permit requires the Applicant to perform stack sampling and other testing as required to establish the actual pattern and quantities of air contaminants being emitted into the atmosphere from the thermal oxidizers to demonstrate compliance with the permit. This sampling must be conducted in accordance with the appropriate procedures contained in the TCEQ Sampling Procedures Manual and the U.S. Environmental Protection Agency (EPA) Reference Methods and must be conducted within 60 days after achieving the maximum operating rate, but no later than 180 days after initial start-up of the facilities.

COMMENT 17: Future Permitting Actions

Susanne Fratzke commented that the application is based on a certain business case and questioned what would happen if the Applicant's business expanded in the future. Ms. Fratzke commented that an expanding business would likely mean more pollution and questioned whether a new air permit would be required.

RESPONSE 17: A permit holder may not vary from any representation or permit condition without obtaining a permit amendment if the change will cause a change in the method of control of emissions, a change in the character of the emissions, or an increase in the emissions rate of any air contaminant. See 30 TAC § 116.116(b). The Executive Director cannot speculate on the need for any future amendments. However, each application received by the agency is reviewed for compliance with applicable rules and regulations and any future applications would need to demonstrate that the proposed facility would utilize the best available control technology (BACT) and that the proposed emissions would not cause or contribute to a violation of the NAAQS or adverse health effects.

COMMENT 18: Location / Trucks / Traffic / Roads / Quality of Life / Aesthetics / Property Value

Location

Commenters expressed concern regarding the location of the proposed facility and its proximity to residential and public areas, including farms, ranches, agricultural areas,

wildlife conservations areas, and water recreation areas. Some commenters also expressed concern that the proposed facility would be located in the Edwards Aquifer contributing zone and several commenters requested that the proposed facility be located somewhere else. Robert Carwell questioned how a governmental body would see fit to enable the construction of a chemical facility in this area. Brittany D. Varner stated the Applicant cheated the system by purchasing land in a residential area and stated that there is no telling who will be next to build in the area. Charles Gross expressed concern that the proposed facility would negatively impact the future development of the area. Luann Howland and Maude Allen expressed concern that the facility's proposed location is in a 100-year flood plain. North San Gabriel Alliance commented that the Applicant withdrew its application for an Edwards Aquifer Contributing Zone Plan which demonstrates that the area is subject to heightened protections and is not suitable for the proposed facility.

In addition, some commenters expressed concern that the Applicant chose the proposed location specifically to avoid regulatory oversight. Bryce McCormick commented that the Applicant is moving to the community so they can operate freely. Peggy Wardlaw commented that the Applicant chose the location so that people would not be around to know when chemicals are spilled. Joe Owen commented that a facility like this operates outside of a city's jurisdiction to avoid scrutiny and air quality controls. Heather Stonehill-Garcia also expressed concern that the Applicant chose the proposed location to avoid peering eyes and avoid getting caught in the event that their facility leaks.

(County Commissioner Cynthia P. Long, North San Gabriel Alliance, Group A, Group C, Group D, Maude Allen, Federico I. Arce, Mark Baker, Tami Baker, Kristyn Barry, Stephen David Bauer, Danial Beesley, Don T. Berry, Joy Borjes, Richard Arthur Box, Conor Brace, Whitney Brace, Lindsey Brassfield, Ashley Brooks, Robert Carwell, Monica Castro, Megan Varvir Coe, C. D. Cook, Tim Cox, Grant Cross, Karen Cross, Paul Davidson, Erin Debarbieri, Cristin L. Dershem, Franchesca C. Estrada, Jennifer Eyre, Tyler Andrew Eyre, Shery Marie Farley, Sheryl Marie Farley, Anthony Figgins, Jennifer Finkel, Dylan Michael Foley, Amanda Foster, Elizabeth Ann Friou, Kyle Gehrler, William Patrick George, Richard Grabish, Charles Gross, Christi Lachelle Gutierrez, Joanna R. Hayes, Kelley Heath, Glenn Heimbigner, Glenn Heimbinger, James Henley, Ed Hillis, Luann Howland, Andrea Jagodzinski, Shawn Jagodzinski, Matthew Johnson, Suzanne Johnson, Catherine Johnston, Chris Kalinowski, Molly Kalinowski, Ericka Lamanna, Jan Love, Babu Madala, Nelson Mak, Alycen Malone, John Martin, Sherri Martin, Mary Massey, Bryce McCormick, Bryce P. McCormick, Timothy McDaniel, Ronal Dalton Mcloud, Andres Mendez, Noor Agha Mendez, Allison Metcalfe, Karen Milone, Kenneth Mohr, Connie Moore, Stephanie Ryder Morris, Casy Nash, Nick Novo, Sarah Novo, Joe Owen, Rebecca R. Owens, Heather Pacheco, Emily Patterson, Carla Picinich, Corrina Pointer, Bryan Primrose, Jackie Primrose, Travis Redding, Bessie Rhodes, James Richardson, Erika Rix, Whitney Robbins, Mark Rocke, Bill Shier, Mark Shifrin, Ellen Skoviera, Robert Smith, Wanda Smith, Jennifer Spies, Michele Stanfield, Heather Stonehill-Garcia, Calvin Tait, Sandra Lee Thurman, Suze Treacy, Larry Tucker, Teresa Tucker, Brittany D. Varner, Laura S. Wallace, Peggy Wardlaw, Susan M. Warhol, Jason Watkins, Nikki Watkins, Scott Weisse, Charles Gregory Wempe, Charles Wempe, Shannon White-

Shubert, Skyler Whittlesey, Keith Wilcox, Charles William, Elizabeth Williams, Haziel Williams)

Quality of Life / Recreation / Aesthetics / Property Value

Commenters are concerned about the effect of the proposed project on their quality of life, on the aesthetics of the area, and on their property and land values. In addition, several commenters stated they moved to the area for the natural beauty and expressed concern that recreational activities such as swimming, fishing, and hunting would be impacted by the proposed facility.

(North San Gabriel Alliance, Tami Baker, Don T. Berry, Alex Campo, Robert Carwell, Monica Castro, Karen Cross, Sheryl Marie Farley, Elizabeth Ann Friou, Kelley Heath, Brian S. Jalufka, John Martin, Mary Massey, Timothy McDaniel, Karen Milone, Heather Pacheco, Paul Keith Turner, Shannon White-Shubert, Keith Wilcox, Elizabeth Williams, Haziel Williams)

Trucks/Traffic/Roads

Charles Gross commented that road infrastructure is poor in the area. Larry Tucker commented that the existing road is not equipped to handle trucks, further expressing concern regarding the potential for traffic accidents. In addition, Mr. Tucker commented that the TCEQ should consider the potential air quality impacts of a traffic accident. Brittany D. Varner expressed concern about semi-trucks carrying toxic chemicals. (Charles Gross, Larry Tucker, Brittany D. Varner)

RESPONSE 18: The TCAA establishes the TCEQ's jurisdiction to regulate air emission in the state of Texas. TCEQ's review of requests for air quality authorizations to emit air contaminants is limited to a review of the best available control technology (BACT) and a health effects review. Accordingly, the TCEQ does not have jurisdiction to consider plant location choices made by an applicant when determining whether to approve or deny a permit application, unless a statute or rule imposes specific distance limitations that are enforceable by the TCEQ. Zoning, land use, aesthetics, and effects on property values are beyond the authority of the TCEQ for consideration when reviewing air quality permit applications. Although TCEQ cannot consider land use issues, the TCEQ does conduct a health effects review to ensure that there will be no adverse impacts to human health and welfare. *See* Response 5 for additional information about the review of the application.

The TCEQ also does not have jurisdiction to consider traffic or road safety when determining whether to approve or deny a permit application. Trucks are considered mobile sources, which are not regulated by the TCEQ. Moreover, the TCEQ is prohibited from regulating roads per TCAA § 382.003(6), which excludes roads from the definition of "facility." These concerns are typically the responsibility of local, county, or other state agencies, such as the Texas Department of Transportation (TxDot) and the Texas Department of Public Safety (DPS). Concerns regarding roads should be addressed to the appropriate state or local officials. However, emissions from these sources may not constitute a nuisance as defined in 30 TAC § 101.4. Although the TCEQ is prohibited from regulating trucks, TCEQ rules prohibit anyone from causing a traffic hazard. Specifically, 30 TAC § 101.5 states, "No person shall discharge from any source whatsoever such quantities of air contaminants, uncombined water, or other

materials which cause or have a tendency to cause a traffic hazard or an interference with normal road use.”

COMMENT 19: Public Infrastructure and Utilities

Cynthia P. Long and Shannon White-Shubert expressed concern that the public infrastructure and utilities in the area would be unable to support the needs of the proposed facility, stating that public utilities in the rural area are unreliable, power outages are common, and that the area does not have sewer, natural gas or adequate water. (County Commissioner Cynthia P. Long, Charles Gross, Brittany D. Varner, Laura S. Wallace, Shannon White-Shubert)

RESPONSE 19: This permit, if issued, will regulate the control and abatement of air emissions only. Issues related to the public infrastructure or the availability of utilities are outside the scope of review of an air quality permit. It is the Applicant's responsibility to ensure it has adequate resources to operate its facility.

COMMENT 20: Attainment Area/State Implementation Plan

Jennifer Spies commented that the Applicant only chose the proposed location because the area is considered to be in attainment. Ms. Spies stated that if the facility had been proposed in a non-attainment area, EPA would be monitoring it and would require a State Implementation Plan (SIP) to detail steps necessary to achieve the standards.

RESPONSE 20: As described in Response 18, the TCEQ does not have jurisdiction to consider plant location choices made by an applicant and therefore cannot deny a permit application on the basis of location unless a statute or rule imposes specific distance limitations that are enforceable by the TCEQ.

The FCAA requires states to develop State Implementation Plans (SIPs) to address attainment and maintenance of the NAAQS. A SIP is a collection of regulations and documents used by a state, territory, or local air district to implement, maintain, and attain the NAAQS and to fulfill other requirements of the FCAA. The Texas SIP, which is federally enforceable, includes Texas' NSR permitting programs for both major and minor sources, and these programs implement both the FCAA and the TCAA. However, SIPs are not required for individual permitting actions. The EPA has approved the Texas SIP, making the TCEQ the permitting authority for regulation of air emissions generated in the state of Texas.

COMMENT 21: Compliance History / Enforcement / Penalties

Commenters expressed concern regarding the Applicant's compliance history, and specifically about violations at its other facility locations. John Martin asked what the company history is when it comes to responses to leaks and about the history of imposed penalties. Group D commented that this Applicant has had too many negligent discharges at its other location.

Susanne Fratzke questioned whether the TCEQ would audit the company to ensure compliance. Stephanie Ryder Morris expressed concern about TCEQ's ability to enforce environmental standards given cuts to the agency's budget. Andres Mendez expressed

concern that penalties are too low and stated that the Applicant views fines as a cost of doing business and would rather pay fines than comply with their permits.

(Group D, Maude Allen, Danial Beesley, Twila Bowden, Whitney Brace, Ranchesca C. Estrada, Jennifer Eyre, Tyler Andrew Eyre, Susanne Fratzke, Jillian Gabriel, Chelsey Heil, James Henley, Lars Kuslich, Katrina D. Leal, Nelson Mak, John Martin, Bryce McCormick, Andres Mendez, Noor Agha Mendez, Stephanie Ryder Morris, Nick Novo, Sarah Novo, Joe Owen, Rebecca R. Owens, Heather Pacheco, Travis Redding, Erika Rix, Bill Shier, Robert Smith, Heather Stonehill-Garcia, Calvin Tait, Nikki Watkins, Charles Gregory Wempe, Charles Wempe, Elizabeth Williams, Haziell Williams)

RESPONSE 21: There are a number of mechanisms by which the TCEQ monitors compliance with permit conditions and state and federal regulations. To the extent that personnel, time, and resources are available, the TCEQ investigates regulated operations to ensure compliance with applicable rules and regulations. Although specific to each site, investigations generally explore the entire operation of the plant. The investigation schedule may be increased if violations are found, violations are repeated, or if a regulated entity is classified as an unsatisfactory performer.

Individuals are encouraged to report environmental concerns or suspected noncompliance with the terms of any permit or other environmental regulation by contacting the TCEQ Austin Regional Office at 512-339-2929 or by calling the 24-hour toll-free Environmental Complaints Hotline at 1-888-777-3186. The TCEQ evaluates all complaints received. If the facility is found to be out of compliance with the terms and conditions of the permit, the Applicant may be subject to enforcement action. Citizen-collected evidence may be used in such an action. *See* 30 TAC § 70.4, Enforcement Action Using Information Provided by Private Individual, for details on gathering and reporting such evidence. Under the citizen-collected evidence program, individuals can provide information on possible violations of environmental law. The information, if gathered according to agency procedures and guidelines, can be used by the TCEQ to pursue enforcement. In this program, citizens can become involved and may eventually testify at a hearing or trial concerning the violation. For additional information, *see* the TCEQ's website at <https://www.tceq.texas.gov/compliance/complaints/protocols>.

Alleged violations documented during an investigation are initially addressed through a notice of violation (NOV) letter, which generally allows the operator a specified period of time within which to comply. The violation is considered resolved upon timely corrective action. If a violation is not timely corrected, repeated, or causes an impact to the environment or neighboring properties, formal enforcement action will begin according to the TCEQ Enforcement Initiation Criteria. Depending on the situation, the commission has the authority to suspend or revoke a permit pursuant to the limitations in Tex. Water Code, Chapter 7, Subchapter G.

Generally, administrative and civil penalties up to \$10,000 and \$50-25,000 respectively, may be assessed for violations of the TCEQ rules. *See* Tex. Water Code, Chapter 7. However, the specific penalties associated with any violation will be determined on a case-by-case basis according to the TCEQ's Penalty Policy. Any economic benefit or monetary gain derived from a failure to comply with TCEQ rules or regulations will be considered and may increase the penalty. Additional information

about the TCEQ penalty policy may be obtained from the TCEQ website, Penalty Policy of the Texas Commission on Environmental Quality, available at <https://www.tceq.texas.gov/compliance/investigation/rg-253.html>.

In addition, during the technical review of permit applications, a compliance history review of both the company and the site is conducted based on the criteria in 30 TAC Chapter 60. These rules may be found at the following website: <https://www.tceq.texas.gov/rules/index.html>.

The compliance history is reviewed for the five-year period prior to the date the permit application was received and includes multimedia compliance-related components about the site under review. These components include: enforcement orders, consent decrees, court judgments, criminal convictions, chronic excessive emissions events, investigations, notices of violations, audits and violations disclosed under the Audit Act, environmental management systems, voluntary on-site compliance assessments, voluntary pollution reduction programs, and early compliance.

A company and site may have one of the following classifications and ratings:

- High: rating below 0.10 - complies with environmental regulations extremely well;
- Satisfactory: rating 0.10 - 55.00 - generally complies with environmental regulations;
- Unsatisfactory: rating greater than 55.00 - fails to comply with a significant portion of the relevant environmental regulations.

The proposed site has a rating of 'unclassified' because it is a new site. The company has a rating of 3.31 and a classification of Satisfactory. The company rating reflects the average of the ratings for all sites the company owns in Texas.

COMMENT 22: Emissions Events / Spills/ Safety / Emergency Response

Commenters expressed concern regarding the safety of the proposed facility, potential chemical exposures, emissions events, explosions, spills, and remediation of hazards. Commenters expressed concern that there is a lack of nearby emergency services that would respond to a chemical plant release or emergency, including medical, fire, and hazmat responders and services. Whitney Brace expressed concern about the safety of the facility and about the potential of exposure to chemical clouds. Kenneth Mohr expressed concern about safety and stated that fluorine is a volatile and explosive chemical. Haziel Williams commented that remediation is the company's responsibility. Peggy Wardlaw expressed concern about the potential for forest fires. Dylan Michael Foley stated that TCEQ would be held accountable when something goes wrong.

Commenters expressed concern that public utilities are not reliable in the area and that water would not be available to firefighters in the case of a fire or explosion. Shannon White-Shubert commented that there is no fire department nearby and that the nearest is a volunteer fire department. Ms. White-Shubert also expressed concern about the distance from the nearest trauma centers to the proposed facility.

North San Gabriel Alliance expressed concern that the application did not include a Risk Management Plan or seek to authorize emergency fire water pumps onsite. North San Gabriel Alliance commented that the Applicant has a poor history of emergency response at its Round Rock facility and that its emergency and disaster response plan is inadequate. Jennifer Spies asked how and when the public would be notified that a release has occurred. Charles McCormick commented that the requirement to self-report releases of toxic gases is doubtful at best and that the Applicant is incentivized to ignore issues to keep the facility out of the spotlight.

(County Commissioner Cynthia P. Long, North San Gabriel Alliance, Group D, Maude Allen, Don T. Berry, Whitney Brace, Paul Davidson, Jennifer Eyre, Tyler Andrew Eyre, Dylan Michael Foley, Elizabeth Ann Friou, Matthew Johnson, Nelson Mak, Mary Massey, Bryce McCormick, Bryce P. McCormick, Charles McCormick, Andres Mendez, Noor Agha Mendez, Karen Milone, Kenneth Mohr, Nick Novo, Sarah Novo, Joe Owen, Bryan Primrose, Jackie Primrose, James Richardson, Bill Shier, Mark Shifrin, Robert Smith, Jennifer Spies, Sandra Lee Thurman, Brittany D. Varner, Peggy Wardlaw, Susan M. Warhol, Charles Gregory Wempe, Shannon White-Shubert, Keith Wilcox, Elizabeth Williams, Haziell Williams)

RESPONSE 22: The draft permit's Maximum Allowable Emission Rate Table (MAERT) lists the only emissions authorized to be emitted from the proposed plant. The TCEQ defines an upset event as an unplanned or unanticipated occurrence or excursion of a process or operation that results in unauthorized emissions of air contaminants. An upset event that results in unauthorized emissions from an emission point is an emissions event. If an upset occurs, the permit holder must comply with the requirements in 30 TAC § 101.201 regarding the recording and reporting of emission events. If the permit holder fails to report in accordance with 30 TAC § 101.201, the commission may initiate an enforcement action for failing to report the underlying emissions event itself.

In the event of an emergency, the Local Emergency Planning Committee and the regulated entity have the primary responsibility of notifying potentially impacted parties regarding the situation. In addition, As set forth in 30 TAC § 101.201(a), regulated entities are required to notify the TCEQ regional office within 24 hours of the discovery of releases into the air and in advance of maintenance activities that could or have resulted in excess emissions. The TCEQ does not have jurisdiction over local fire prevention or protection and cannot require an applicant to authorize emergency fire water pumps. However, the receipt of an air permit does not negate the responsibility of an applicant to apply for any additional required authorizations prior to operating a plant or from complying with other applicable regulations.

Proposed projects which involve toxic chemicals that are known or suspected to have potential for life threatening effects upon off-facility property in the event of a disaster and involve manufacturing processes that may contribute to the potential for disastrous events may be subject to a disaster review. Specifically, federal rules require owners and operators of a facility that manufactures, uses, stores, or otherwise handles more than a threshold quantity of a regulated substance listed in 40 C.F.R. § 68.130, to implement a risk management program and submit a single Risk

Management Plan for all covered processes to the EPA. TCEQ has not been delegated the authority to administer this program. However, the draft permit requires the permit holder to comply with EPA regulations on Chemical Accident Prevention Provisions promulgated in 40 CFR Part 68. In addition, as part of the technical review of air quality permit applications, the Executive Director questions whether the proposed facility will handle more than a threshold quantity of a regulated substance listed in 40 C.F.R. § 68.130, as part of its disaster review. If a proposed facility is subject to a disaster review, the Executive Director will request that the applicant submit its Risk Management Plan which is then kept on file with the TCEQ. This application triggered a disaster review for hydrogen fluoride (HF) and the draft permit requires the Applicant to submit its Risk Management Plan (RMP) to the Air Permits Division prior to the date the facility first exceeds a threshold quantity of hydrogen fluoride.

COMMENT 23: Corporate Profits / Financial Assurance

Commenters questioned the corporate profits made by this project at a cost to the surrounding community. John Martin asked what financial assurance is in place to reimburse the community if contamination occurs. (Ashley Brooks, John Martin, Bill Shier, Heather Stonehill, Heather Stonehill-Garcia)

RESPONSE 23: The TCEQ does not have jurisdiction to prohibit anyone from seeking authorization to emit air contaminants; nor can the TCEQ prohibit owners and operators from receiving authorization to emit air contaminants if they comply with all statutory and regulatory requirements. The applicable state and federal statutes and rules that govern this air quality permit application do not include provisions requiring financial assurance. Further, the TCEQ is not authorized to consider a company's financial status, profit issues, or third-party contractual agreements in determining whether a permit should be issued.

COMMENT 24: Covenants, Conditions and Restrictions / Deed Restrictions

Commenters expressed concern about the Applicant's compliance with Covenants, Conditions, and Restrictions and Deed Restrictions. Kyle Gehrer stated that restrictions were implemented on all lots that prohibited business from operating on the properties and questioned how the Applicant is able to obtain a permit to operate if this is the case. Suzanne Johnson stated that the Applicant is in violation of deed restrictions and questioned whether permission from the declarant of the property has been given. Shannon White-Shubert expressed similar concerns, commenting that the proposed facility would violate the community deed restrictions which state 'no noxious, noisy, offensive, undesirable, unlawful, or immoral activity shall be conducted on any tract'. Ms. White-Shubert further commented that documents were not filed with Williamson County which establish the property or community as a planned unit development, that the covenants run with the land, and that the deed restrictions will be upheld in a court of law if needed.

(Kyle Gehrer, Suzanne Johnson, Shannon White-Shubert, Brittany D. Varner, Chris Kalinowski, Molly Kalinowski)

RESPONSE 24: The TCEQ does not have jurisdiction to enforce compliance with deed restrictions, including any Covenants, Conditions and Restrictions. However, the issuance of an air quality permit does not negate the obligation of an applicant to ensure it has or will obtain the legal authority necessary to construct its facility in the proposed location.

COMMENT 25: TCEQ's Responsibility to the Community / Project Opposition and Support

Commenters asked that the TCEQ consider residents and their wishes and choose not to issue the permit. Commenters stated that the TCEQ should uphold its mission statement and protect the surrounding environment by not issuing the permit. Keith Wilcox commented that the proposed facility was an irresponsible idea and plan and questioned why the government isn't protecting the local public. Stephanie Ryder Morris stated TCEQ has failed to enforce water and air quality standards and expressed concern that applicable standards are not strict enough. Group A called upon TCEQ to rescind its preliminary decision on the application.

Cynthia P. Long requested TCEQ do a full and thorough review of the permit application and consider the concerns of the neighboring property owners. Joe Owen commented that the application deserves the highest scrutiny. Tami Baker requested that landowners have the ability to have a say in their future. Sandra Lee Thurman stated that TCEQ and other regulators must withdraw and deny other permits for this facility. John Martin questioned how close the TCEQ personnel reviewing the application lived in relation to the proposed facility.

Barry L. Bowden stated that after learning no water discharges would be authorized by this permit, he was in support of the project. John G. Dupont also commented in favor of the proposed facility.

(Senator Charles Schwertner, County Commissioner Cynthia P. Long, Group A, Group B, Group D, Maude Allen, Mark Baker, Tami Baker, Kristyn Barry, Stephen Bauer, Stephen David Bauer, Joy Borjes, Barry L. Bowden, Twila Bowden, Whitney Brace, Alex Campo, Robert Carwell, Monica Castro, C. D. Cook, Grant Cross, Cristin L. Dershem, Franchesca C. Estrada, Sheryl Marie Farley, Dylan Michael Foley, Amanda Foster, Elizabeth Ann Friou, Jillian Gabriel, Shannon Gehrler, Richard Grabish, Kelley Heath, Chelsey Heil, Brenda Hendrickson, Liz Howells, Brian S. Jalufka, Matthew Johnson, Suzanne Johnson, Timothy King, Lars Kuslich, Ericka Lamanna, Katrina D. Leal, Babu Madala, Alycen Malone, John Martin, Sherri Martin, Lnda Martinez, Bryce P. McCormick, Timothy McDaniel, Ronal Dalton McCloud, Jannah Mersiovsky, Karen Milone, Stephanie Ryder Morris, Cindy Nash, Abby Ogletree, Brittney Ortiz, Joe Owen, Heather Pacheco, Emily Patterson, Corrina Pointer, Bryan Primrose, Jackie Primrose, Travis Redding, Bessie Rhodes, James Richardson, Erika Rix, Whitney Robbins, Chris Robion, Wanda Smith, Jennifer Spies, Tim Thrash, Sandra Lee Thurman, Teresa Tucker, Laura S. Wallace, Frankie Waller, Jason Watkins, Nikki Watkins, Charles Wempe, Shannon White-Shubert, Keith Wilcox, Haziell Williams)

RESPONSE 25: The Executive Director's staff has reviewed the permit application in accordance with the applicable state and federal law, policy and procedures, and the

agency's mission to protect the state's human and natural resources consistent with sustainable economic development. The decision by the Executive Director to issue the permit is based upon the authority and direction of the Texas Clean Air Act. Specifically, TCAA § 382.0518 provides that the TCEQ shall issue the permit if an application demonstrates that the proposed facility will use at least the BACT and there is no indication that the emissions from the facility will contravene the intent of the TCAA. If the plant is operated in compliance with the terms and conditions of the permit, the emissions from the facilities authorized by this permit should not adversely impact public health or the environment.

CHANGES MADE IN RESPONSE TO COMMENT

No changes to the draft permit have been made in response to public comment.

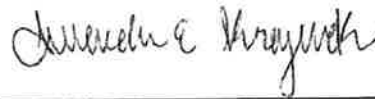
Respectfully submitted,

Texas Commission on Environmental Quality

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REPRESENTING THE
EXECUTIVE DIRECTOR OF THE
TEXAS COMMISSION ON
ENVIRONMENTAL QUALITY

**Exfluor Research Corporation
Permit No. 165848**

Appendix A

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COMMENT GROUP C: Lindsey Brassfield, Catherine Johnston, Bryce P. McCormick, Casey Nash, Carla Picinich, and Suze Treacy

COMMENT GROUP D: Fanchesca C. Estrada, Jennifer Eyer, Tyler Andrew Eyre, Nelson Mak, Andres Mendez, Noor Agha Mendez, Nick Novo, Rebecca R. Owens, Robert Smith, Calvin Tait, and Nikki Watkins

Application Exhibit 33

TCEQ Chief Clerk Mailing of the December
14, 2022 TCEQ Commission Agenda Date

Jon Niermann, *Chairman*
Emily Lindley, *Commissioner*
Bobby Janecka, *Commissioner*
Toby Baker, *Executive Director*



TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

Protecting Texas by Reducing and Preventing Pollution

November 9, 2022

TO: Persons on the Attached Mailing List

**RE: Docket No. 2022-1552-AIR
Exflur Research Corporation (Applicant)
Request(s) filed on Permit No. 165848**

The above-referenced application and all timely filed hearing requests/requests for reconsideration on the above-referenced application will be considered by the commissioners of the Texas Commission on Environmental Quality (TCEQ) during the public meeting on **December 14, 2022**. The meeting will begin at 9:30 a.m. Due to the ongoing pandemic, the agenda meeting may be held in person in Room 201S of Building E at the Commission's offices located at 12100 Park 35 Circle in Austin, Texas, virtually, or both in person and virtually. To confirm how the meeting will be held, please visit the Commissioners' Agenda webpage at: https://www.tceq.texas.gov/agency/decisions/agendas/comm/comm_agendas.html eight days before the Agenda.

In accordance with commission rules, copies of the timely hearing requests/requests for reconsideration have been forwarded to the Applicant, the Executive Director of the TCEQ, and the Public Interest Counsel of the TCEQ. Each of these persons is entitled to file a formal written response to the hearing requests/requests for reconsideration on or before 5:00 p.m. on **November 21, 2022**. Persons who have filed timely hearing requests/requests for reconsideration may file a formal written reply to these responses on or before 5:00 p.m. on **December 5, 2022**.

All responses and replies must be filed with the Chief Clerk of the TCEQ. Responses and replies may be filed with the Chief Clerk electronically at www.tceq.texas.gov/goto/efilings or by filing an original and 7 copies with the Chief Clerk of the TCEQ. The mailing address of the Chief Clerk is: Office of Chief Clerk, ATTN: Agenda Docket Clerk, Mail Code 105, TCEQ, P. O. Box 13087, Austin, Texas 78711-3087 [Fax number (512) 239-3311]. On the same day any response is transmitted to the Chief Clerk, a copy must also be sent to the Executive Director, the Public Interest Counsel, the Applicant, and the requesters at their addresses listed on the attached mailing list. On the same day any reply is transmitted to the Chief Clerk, a copy must also be sent to the Executive Director, the Public Interest Counsel, other requesters, and the Applicant at their addresses listed on the attached mailing list.

The procedures for evaluating hearing requests/requests for reconsideration are located in 30 Texas Administrative Code (TAC) Chapter 55, Subchapter F (§§55.200-211) of the

commission's rules. The procedures for filing and serving responses and replies are located in 30 TAC Chapters 1 (§§1.10-11) and 55 (§55.209) of the commission's rules.

The hardcopy filing requirement is waived by the General Counsel pursuant to 30 TAC §1.10(h). Copies of these rules may be obtained by calling the Public Education Program toll free at 1-800-687-4040.

The commissioners will not take oral argument or additional comment on this matter at the public meeting. Therefore, it is important to address the sufficiency of the requests in timely filed written responses and requesters' replies. At the public meeting, the commissioners may ask questions of the Applicant, requesters, or TCEQ staff. The commissioners will make a decision on the request(s) during the meeting and will base that decision on the timely written requests, public comments, any written responses and replies, any responses to questions during the meeting, and applicable statutes and rules. Copies of all timely public comments and requests have been forwarded to the Alternative Dispute Resolution Program to determine if informal, voluntary mediation might help resolve any dispute.

The attachment to this letter is intended to help you better understand how the TCEQ processes and evaluates hearing requests and requests for reconsideration. To obtain additional information, or to ask questions about anything in this letter, please call the Public Education Program toll free at 1-800-687-4040.

Sincerely,



Laurie Gharis
Chief Clerk

Enclosures: Copies of protestant correspondence to Applicant, Executive Director, Office of Public Interest Counsel, and Alternative Dispute Resolution.

ATTACHMENT

Procedures Concerning Requests for Reconsideration and Requests for Contested Case Hearing

The purpose of this document is to describe commission procedures for evaluating requests for reconsideration and requests for contested case hearing. This document is not intended to be a comprehensive guide to public participation at the TCEQ.

The three commissioners determine the validity of requests for reconsideration and requests for contested case hearing and vote to grant or deny the requests during a public meeting. These public meetings are usually held every other Wednesday in Austin. Prior to the meeting, the following occurs:

- (1) the written requests are distributed to the executive director, the public interest counsel, and the Applicant. These persons may file a response at least 23 days before the meeting;
- (2) the requester may then file a reply to the responses at least 9 days before the meeting. This is the requester's opportunity to address any deficiencies in the request that have been identified by TCEQ staff or the Applicant. The requester must submit any information he or she wishes the commissioners to consider (ex: maps or diagrams showing requester's location relative to the Applicant's proposed activities) by this deadline; and
- (3) the commissioners read the requests, the responses to requests, and the replies, before the public meeting. Then, during the public meeting, the commissioners vote to grant or deny the requests.

Requests for Reconsideration

A request for reconsideration must expressly state that the person is requesting that the commission reconsider the executive director's decision and state the reasons why the commission should reconsider the executive director's decision. The commission will consider a request for reconsideration at a scheduled public meeting and grant or deny the request.

Requests for Contested Case Hearing

A contested case hearing is an evidentiary proceeding, similar to a hearing in civil court. The law allows for holding a contested case hearing on certain types of applications.

A valid request for a contested case hearing must:

- (1) demonstrate that the requester is an "affected person" with a "personal justiciable interest" related to a legal right, duty, privilege, power or economic interest which would be affected by the application in a manner not common to the general public;

- (2) If the request is made by a group or association, the request must identify:
 - (A) one person by name, address, daytime telephone number, and, if possible, the fax number, of the person who will be responsible for receiving all communications and documents for the group;
 - (B) the comments on the application submitted by the group that are the basis of the hearing request; and
 - (C) by name and physical address one or more members of the group that would otherwise have standing to request a hearing in their own right. The interests the group seeks to protect must relate to the organization's purpose. Neither the claim asserted nor the relief requested must require the participation of the individual members in the case.
- (3) expressly request a contested case hearing;
- (4) raise disputed issues of fact that are relevant and material to the commission's decision on the application which were raised **by the requestor** during the comment period and not withdrawn **by the requestor** prior to the filing of the Executive Director's Response to Comment; and
- (5) include any other information as specified in public notices.

The commission is authorized to protect human health and safety, and natural resources. The commission cannot address other matters outside the commission's authority, such as the effect of the existence of a proposed facility on nearby property values.

When the commissioners deny hearing requests, they often proceed to vote on approval or denial of the application. Alternatively, they may remand the application to the executive director for final action. If a hearing request is granted and the application is referred to the State Office of Administrative Hearings (SOAH), the commissioners will specify a list of issues which will be the subject of the hearing and an expected date for the SOAH judge's proposal for decision. Pursuant to 30 TAC § 80.118(d), if a matter is referred to SOAH by the Commission for hearing, the Applicant shall provide to the Chief Clerk two duplicates of the original application, including all revisions to the application, for inclusion in the administrative record, no later than 10 days after the Chief Clerk mails the Commission's Order referring the matter to SOAH. The SOAH judge will conduct the hearing and submit a proposal to the commission to approve or deny the application.

The Alternative Dispute Resolution Program may contact requesters to determine their interest in informal discussions with the permit Applicant and a mediator.

By necessity this document gives a very general description of commission procedures. If you have any questions, please call the Public Education Program toll free at 1-800-687-4040.

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DOCKET NO. 2022-1552-AIR; PERMIT NO. 165848

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Samantha Woolf
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Application Exhibit 34

Legislative Letter

Senate Bill 709 (84th Texas Legislative Session, 2015) amended the Texas Water Code by adding new Section 5.5553, which requires the Texas Commission on Environmental Quality (TCEQ) to provide written notice to you at least thirty (30) days prior to the TCEQ's issuance of draft permits for applications that are located in your district.

Exfluor Research Corporation has applied to the TCEQ for air quality permitting actions regarding a Exfluor Research.

Application Received Date: July 9, 2021

Location: 1100 County Road 236, Florence, Williamson County, Texas, 76527

This link to an electronic map of the site or facility's general location is provided as a public courtesy and not part of the application or notice:

<http://www.tceq.texas.gov/assets/public/hb610/index.html?lat=30.791111&lng=-97.904166&zoom=13&type=r>.

Air Quality Permits affected:

- *Air Quality Permit 165848*

You were previously sent notification for this application, but the draft permit was delayed.

TCEQ is preparing the initial draft permit for applicant review. At the time the draft permit is issued, the applicant will be required to publish notice in a newspaper of general circulation, and the TCEQ will provide a copy of the notice of draft permit to persons who have requested to be on a mailing list.

Questions regarding this email may be directed to Bonnie Evridge by calling 512-239-5222.

Issued: December 05, 2022

Application Exhibit 35

TCEQ Office of Public Interest Counsel's Response to Requests for Hearing and Request for Reconsideration

Jon Niermann, *Chairman*
Emily Lindley, *Commissioner*
Bobby Janecka, *Commissioner*
Toby Baker, *Executive Director*



Garrett T. Arthur, *Public Interest Counsel*

TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

Protecting Texas by Reducing and Preventing Pollution

November 21, 2022

Laurie Gharis, Chief Clerk
Texas Commission on Environmental Quality
Office of the Chief Clerk (MC-105)
P.O. Box 13087
Austin, Texas 78711-3087

RE: EXFLUOR RESEARCH CORPORATION (APPLICANT)
TCEQ DOCKET NO. 2022-1552-AIR

Dear Ms. Gharis:

Enclosed for filing is the Office of Public Interest Counsel's Response to Hearing Requests and Requests for Reconsideration in the above-entitled matter.

Sincerely,

A handwritten signature in black ink that reads "Pranjal".

Pranjal M. Mehta, Attorney
Assistant Public Interest Counsel

cc: Mailing List

DOCKET NO. 2022-1552-AIR

EXFLUOR RESEARCH
CORPORATION
AIR PERMIT 165848

§
§
§

BEFORE THE
TEXAS COMMISSION ON
ENVIRONMENTAL QUALITY

**THE OFFICE OF PUBLIC INTEREST COUNSEL'S RESPONSE
TO HEARING REQUESTS AND REQUESTS FOR RECONSIDERATION**

To the Members of the Texas Commission on Environmental Quality:

The Office of Public Interest Counsel (OPIC) at the Texas Commission on Environmental Quality (Commission or TCEQ) files this response to the hearing requests and requests for reconsideration in the above-captioned matter and respectfully submits the following.

I. Summary of Position

For the reasons stated herein, OPIC respectfully recommends the Commission grant the hearing requests from the North San Gabriel Alliance, Elizabeth Friou, Suzanne Johnson, Charles McCormick, Patricia Mulvihill, Sandra Thurman, Brittany Varner, Peggy and Harold Wardlaw, Mike and Shannon White-Shubert, and Haziell Williams, refer the relevant and material issues specified in Section IV.G to the State Office of Administrative Hearings (SOAH) for a contested case hearing, and deny the remaining hearing requests and all pending requests for reconsideration.

II. Background

On July 9, 2021, Exflur Research Corporation (Applicant) applied to TCEQ for a new Air Permit 165848 that would authorize the Applicant to construct the Exflur Research facility (facility). The facility would be located at 1100 County Road (CR) 236, Florence, Williamson County. Contaminants authorized under the draft permit include hydrogen fluorides, carbon monoxide, particulate matter, hazardous air pollutants, nitrogen oxides, and organic compounds.

The permit application was received on July 9, 2021 and declared administratively complete on July 14, 2021. The Notice of Receipt and Intent to Obtain an Air Quality Permit (first public notice) for this permit application was published in English on July 28, 2021 in the *Williamson County Sun*, and in Spanish on July 29, 2021 in *El Mundo*. The Notice of Application and Preliminary Decision for an Air Quality Permit (second public notice) was published in English on March 6, 2022, in the *Williamson County Sun*, and in Spanish on March 10, 2022 in *El Mundo*. A public meeting was held June 16, 2022, in Florence. The public comment period closed June 20, 2022, and the Executive Director's (ED) Response to Comments (RTC) was mailed September 13, 2022. The deadline to submit hearing requests and requests for reconsideration was October 13, 2022.

The Commission received timely hearing requests from North San Gabriel Alliance, Nicole Bauer, Ann and Thomas Beville, Terry Cook, Sheryl Farley, Elizabeth Friou, Kelly Heath, Suzanne Johnson, Catherine Johnston, Charles McCormick, Erin McCormick, Joyce McCormick, Nickolas McCormick, Henry Mulvihill, Patricia Mulvihill, Joe Pacheco, Chris Peyton, Renee Peyton,

Sandra Thurman, Brittany Varner, Harold Wardlaw, Peggy Wardlaw, Shannon White-Shubert, and Haziell Williams. Also, the Commission received timely requests for reconsideration from North San Gabriel Alliance, Nicole Bauer, Jillian Gabriel, Richard Grabish, Alycen Malone, Timothy Mcdaniel, Karen Milone, Jennifer Spies, and Mike and Shannon White-Shubert.

III. Applicable Law

A. Hearing Requests

This application was filed on or after September 1, 2015, and is therefore subject to Senate Bill 709, Tex. S.B. 709, 84th Leg., R.S. (2015) (SB 709). For SB 709 applications, Texas Water Code Section 5.115(a-1)(2)(B) provides the Commission may not find that a hearing requestor is an affected person unless the hearing requestor timely submitted comments on the application. Texas Government Code Section 2003.047(e-1) further provides that each issue referred by the Commission must have been raised by an affected person in a timely comment filed by that affected person. The Commission's Chapter 55 rules implement these statutory requirements and other provisions of SB 709.

Under Title 30, Texas Administrative Code (TAC) § 55.201(c), a hearing request by an affected person must be in writing, must be timely filed, may not be based on an issue raised solely in a public comment which has been withdrawn, and, for applications filed on or after September 1, 2015, must be based only on the affected person's timely comments.

Section 55.201(d) states that a hearing request must substantially comply with the following:

- (1) give the name, address, daytime telephone number, and, where possible, fax number of the person who files the request;
- (2) identify the person's personal justiciable interest affected by the application, including a brief, but specific, written statement explaining in plain language the requestor's location and distance relative to the proposed facility or activity that is the subject of the application and how and why the requestor believes he or she will be adversely affected by the proposed facility or activity in a manner not common to members of the general public;
- (3) request a contested case hearing;
- (4) for applications filed on or after September 1, 2015, list all relevant and material disputed issues of fact that were raised by the requestor during the public comment period and that are the basis of the hearing request. To facilitate the Commission's determination of the number and scope of issues to be referred to hearing, the requestor should, to the extent possible, specify any of the ED's responses to the requestor's comments that the requestor disputes, the factual basis of the dispute, and list any disputed issues of law; and
- (5) provide any other information specified in the public notice of application.

Under 30 TAC § 55.203(a), an "affected person" is one who has a personal justiciable interest related to a legal right, duty, privilege, power, or economic interest affected by the application. An interest common to members of the general public does not qualify as a personal justiciable interest. Section 55.203(c) provides relevant factors to be considered in determining whether a person is affected. These factors include:

- (1) whether the interest claimed is one protected by the law under which the application will be considered;
- (2) distance restrictions or other limitations imposed by law on the affected interest;
- (3) whether a reasonable relationship exists between the interest claimed and the activity regulated;

- (4) likely impact of the regulated activity on the health, safety, and use of property of the person;
- (5) likely impact of the regulated activity on use of the impacted natural resource by the person;
- (6) for a hearing request on an application filed on or after September 1, 2015, whether the requestor timely submitted comments on the application that were not withdrawn; and
- (7) for governmental entities, their statutory authority over or interest in the issues relevant to the application.

Under § 55.203(d), to determine whether a person is an affected person for the purpose of granting a hearing request for an application filed on or after September 1, 2015, the Commission may also consider the following:

- (1) the merits of the underlying application and supporting documentation in the administrative record, including whether the application meets the requirements for permit issuance;
- (2) the analysis and opinions of the ED; and
- (3) any other expert reports, affidavits, opinions, or data submitted by the ED, the applicant, or hearing requestor.

Under 30 TAC § 55.205(b), a hearing request by a group or association may not be granted unless all of the following requirements are met:

- (1) comments on the application are timely submitted by the group or association;
- (2) the request identifies, by name and physical address, one or more members of the group or association that would otherwise have standing to request a hearing in their own right;
- (3) the interests the group or association seeks to protect are germane to the organization's purpose; and
- (4) neither the claim asserted nor the relief requested requires the participation of the individual members in the case.

For an application filed on or after September 1, 2015, § 55.211(c)(2)(A)(ii) provides that a hearing request made by an affected person shall be granted if the request raises disputed issues of fact that were raised by the affected person during the comment period, that were not withdrawn by filing a withdrawal letter with the Chief Clerk prior to the filing of the ED's RTC, and that are relevant and material to the Commission's decision on the application.

Under § 55.211(c)(2)(B)-(D), the hearing request, to be granted, must also be timely filed with the Chief Clerk, pursuant to a right to hearing authorized by law, and comply with the requirements of § 55.201.

B. Requests for Reconsideration

Any person may file a request for reconsideration of the ED's decision under 30 TAC § 55.201(e). The request must be in writing and filed with the Chief Clerk no later than 30 days after the Chief Clerk mails the ED's decision and RTC. The request must expressly state that the person is requesting reconsideration of the decision and give reasons why the decision should be reconsidered.

IV. Analysis of Hearing Requests

A. Whether the requestors are affected persons

North San Gabriel Alliance

The North San Gabriel Alliance (NSGA) submitted timely comments and hearing requests.¹ NSGA is a non-profit organization that works to protect the

¹ The hearing requests were submitted on October 13, 2022, June 16, 2022, June 3, 2022, and April 1, 2022 by attorney Lauren Ice.

natural environment, homes, crops, animals, and property of people who live, work, farm, ranch, and recreate in the area of the North Fork of the San Gabriel River, in Williamson and Burnet Counties.

As required for group standing under 30 TAC § 55.205(b), NSGA timely submitted comments; the interests NSGA seeks to protect are germane to its purpose; neither the claim asserted nor the relief requested requires the participation of individual NSGA members; and NSGA's hearing request identifies, by name and address, members who would otherwise have standing to request a hearing in their own right. The hearing requests name Patricia Mulvihill, Bryce McCormick, Ann Friou, Charles Williams, Jr. and Haziel Williams, and Peggy Wardlaw as the group members who would be adversely affected by the draft permit. As discussed below, Patricia Mulvihill, Haziel Williams, and Peggy Wardlaw would qualify individually as affected persons in this matter. Therefore, OPIC finds that NSGA meets the requirements for group standing and qualifies as an affected person.

Individuals Within Close Proximity to the Facility

Elizabeth Friou stated that she owns two land parcels directly across the street from the facility. Ms. Friou uses her property for ranching operations. She suffers from asthma and preexisting health conditions and is concerned that her air quality, health, the health of her employees and livestock, and her ability to safely use and enjoy the property will be adversely impacted. The ED's map shows that Ms. Friou is located approximately 0.1 miles from the facility.

Suzanne Johnson stated that she lives approximately 1000 feet from the facility. She is concerned that her air quality, health, and health of her family, pets, and livestock will be adversely impacted. The ED's map shows that Ms. Johnson is located approximately 0.3 miles from the facility.

Sandra Thurman stated that she lives 0.28 miles from the facility. She is sensitive to airborne allergies that can cause respiratory issues and is concerned that the air quality and her health will be adversely impacted. The ED's map shows that Ms. Thurman is located approximately 0.63 miles from the facility.

Brittany Varner stated that she owns land exactly 0.4 miles from the facility. Ms. Varner uses her property as a residence and for recreational purposes. She is concerned that her health, health of the family and farm animals, and her ability to safely enjoy her property will be adversely impacted. The ED's map shows that Ms. Varner is located approximately 0.37 miles from the facility.

Peggy and Harold Wardlaw² stated that they own interest in the McCormick Ranch located at 1050 CR 208 and 30-acre parcel located across CR 306. The Wardlaws currently use every part of their property for raising cattle and for recreational activities such as hunting. They are concerned that their air quality, family health, and their ability to safely use and enjoy the property will be adversely impacted. The ED's map shows that McCormick Ranch is located approximately 0.97 miles from the facility.

² Peggy and Harold Wardlaw timely submitted identical hearing requests. Ms. Wardlaw did not submit written comments, however, she submitted oral comments during the public meeting held on June 16, 2022.

Patricia Mulvihill stated that she is a co-trustee for the McCormick Ranch land owned by her children's trust. Ms. Mulvihill and her family currently use this property for recreational purposes. She is sensitive to airborne environmental risks and is concerned that her air quality, family health, and her ability to safely use and enjoy the property will be adversely impacted. As discussed above, the ED's map shows that McCormick Ranch is located approximately 0.97 miles from the facility.

Charles McCormick stated that he owns land on CR 208 approximately 0.6 miles north of the facility. Mr. McCormick and his family use this land for recreational purposes. He is concerned that his air quality and family health will be adversely impacted. As discussed above, the ED's map shows that McCormick Ranch is located approximately 0.97 miles from the facility.

Mike and Shannon White-Shubert stated that their property is located 1,086 feet downhill from the facility. They use every part of their property to raise bees. They spend lot of time outdoors on their property to maintain beehives and trees on their property. They are concerned that their health and health of their pets and bees will be adversely impacted. The ED's map shows that they are located approximately 0.33 miles from the facility.

Haziel Williams stated that she owns two tracts of land within one mile of the facility. Ms. Williams currently uses her property for recreational purposes. Ms. Williams suffers from preexisting health conditions and is sensitive to chemicals in her environment. She is concerned that her air quality, health, and

family's health will be adversely impacted. The ED's map shows that Ms. Williams is located approximately 0.71 miles from the facility.

All these requestors timely submitted comments and hearing requests. Their concerns include air quality, human and animal health effects, and the use and enjoyment of their property. Their relative proximity to the facility, when combined with their concerns regarding air quality, health effects, and use and enjoyment of property, gives them a personal justiciable interest in this matter. Their proximity also indicates that they could be impacted in a manner not common to the general public and distinguishes their personal justiciable interest from an interest common to the general public. Further, the 30 TAC § 55.203 affected person determination factors indicate that these individuals qualify as an affected person. First, their concerns about air quality, health effects, and use and enjoyment of property are interests protected by the law under which this application is being considered. Second, a reasonable relationship exists between those interests and the regulation of air contaminants. Finally, their proximity to the facility increases the likelihood of impacts to their health, safety, and use of property. OPIC finds that all these individuals qualify as affected persons in this matter.

Individuals Located Farther from The Facility

Anne and Thomas Beville Jr. are concerned that their air quality, health, health of the family, pets, and bees that they raise on their property, and their ability to safely enjoy the property will be adversely impacted. The ED's map shows that they are located approximately 10.36 miles from the facility.

Sheryl Farley is concerned that her air quality, family health and health of the livestock, and her ability to safely enjoy her property will be adversely impacted. The ED's map shows that she is located approximately 2.41 miles from the facility.

Kelley Heath is concerned that air quality, family health, and the ability to safely use and enjoy property will be adversely impacted. The ED's map shows that requestor is located approximately 11.97 miles from the facility.

Joe Pacheco is concerned that his air quality and family health will be adversely impacted. The ED's map shows that he is located approximately 4.17 miles from the facility.

Chris and Renee Payton submitted identical hearing requests. They are concerned that their air quality, family health, and their ability to safely enjoy their property will be adversely impacted. The ED's map shows that they are located approximately 9.39 miles from the facility.

All these requestors submitted timely comments and hearing requests. However, at their distance farther from the facility, they lack the proximity necessary to establish a personal justiciable interest which is distinct from interests common to the general public. Without a personal justiciable interest, a hearing requestor cannot qualify as an affected person. Further, the intervening distance diminishes any likelihood that the regulated activity will impact their health, safety, or use of property. Therefore, OPIC finds that these requestors do not qualify as affected persons.

Individuals Who Did Not Raise A Personal Justiciable Interest

Henry Mulvihill Jr. submitted timely comments and a hearing request. His hearing request just references a question and answer discussion during the public meeting held on June 16, 2022 and includes a news link for this reference.

Catherine Johnston submitted timely comments and a hearing request. Her hearing request stated that she would like to request a contested case hearing and included a document submitted to NSGA by Lone Star Chapter Sierra Club regarding urgent health and environmental concerns over polyfluoroalkyl and HF chemicals.

Both hearing requestors do not explain how they have an interest that differs from the general public, as required by 30 TAC § 55.201(d)(2). OPIC finds that both the requestors do not raise personal justiciable interests protected by law under which the application will be considered. 30 TAC § 55.203(a) & (d). Therefore, OPIC cannot find that they qualify as affected persons.

Individuals Who Did Not Submit Timely Comments

Terry Cook submitted a timely hearing request. The hearing request shows Williamson County as the company name and Williamson County's Tax Office address as the address. However, the hearing request does not specify whether it is submitted on behalf of Williamson County.³ Therefore, OPIC considers this hearing request to be an individual hearing request. Terry Cook raised concerns

³ If Williamson County would like to pursue standing in this matter, the County can appear at the SOAH preliminary hearing and seek to be admitted as a party if a hearing is granted. 30 TAC § 55.211(e).

regarding air quality. However, Terry Cook did not submit any comments during the public comment period.

Nicole Bauer, Erin McCormick, Joyce McCormick, and Nickolas McCormick submitted timely hearing requests and raised concerns that their air quality, family health, and ability to safely use and enjoy their property will be adversely impacted. None of these requestors submitted any comments during the public comment period. Under 30 TAC § 55.201(c), a hearing request must be based on the requestor's timely comments. Because these requestors did not submit timely comments, OPIC cannot find that they qualify as affected persons.

B. Which issues raised in the hearing requests are disputed

The following issues are disputed and were raised by affected requestors.

1. Whether the draft permit will adversely affect air quality; human health and welfare, including sensitive receptors with preexisting health conditions; and the environment. (NSGA, Elizabeth Friou, Charles McCormick, Patricia Mulvihill, Sandra Thurman, Brittany Varner, Harold and Peggy Wardlaw, Mike and Shannon White-Shubert, Haziell Williams)
2. Whether the facility would interfere with use and enjoyment of property. (Elizabeth Friou)
3. Whether the draft permit will adversely affect animal life, including endangered species and wildlife; vegetation; and property. (NSGA, Elizabeth Friou, Suzanne Johnson, Mike and Shannon White-Shubert)
4. Whether the air dispersion modeling and evaluation of the surrounding area was adequate. (NSGA, Elizabeth Friou)
5. Whether emissions calculations were correct. (NSGA, Elizabeth Friou)
6. Whether the BACT (best available control technology) analysis was proper, and the draft permit will achieve the use of BACT. (NSGA, Elizabeth Friou)

7. Whether the allowance of chemical flexibility in the draft permit is appropriate. (NSGA, Elizabeth Friou)
8. Whether the draft permit's hours of operations are appropriate. (NSGA, Elizabeth Friou)
9. Whether the draft permit's monitoring and recordkeeping requirements are adequate to ensure compliance. (NSGA, Elizabeth Friou, Charles McCormick)
10. Whether the Applicant's compliance history justifies changes to the draft permit. (NSGA, Elizabeth Friou)
11. Whether the risk management plan requirement in the draft permit is adequate. (NSGA, Elizabeth Friou)
12. Whether the operations authorized under the draft permit would adversely impact local waterways, groundwater, and surrounding water wells. (Charles McCormick, Brittany Varner, Harold and Peggy Wardlaw, Haziell Williams)

C. Whether the dispute involves questions of fact or of law

All of the issues involve questions of fact.

D. Whether the issues were raised during the public comment period

The issues listed above in Section IV.B were all raised during the public comment period.

E. Whether the hearing requests are based on issues raised solely in public comments which have been withdrawn

None of the hearing requests are based on issues raised solely in public comments which have been withdrawn.

F. Whether the issues are relevant and material to the decision on the application

Air Quality and Health Effects

Under the Texas Clean Air Act, the Commission may issue this permit only if it finds no indication that the emissions from the facility will contravene the intent of the Texas Clean Air Act, including protection of the public's health and physical property. TEX. HEALTH & SAFETY CODE § 382.0518(b)(2). Further, the purpose of the Texas Clean Air Act is to safeguard the state's air resources from pollution by controlling or abating air pollution and emissions of air contaminants, consistent with the protection of public health, general welfare, and physical property. TEX. HEALTH & SAFETY CODE § 382.002(a). Therefore, Issue No. 1 regarding air quality and human health and Issue Nos. 4, 5, 7, 8, 9, 10, and 11 are relevant and material to the Commission's decision under the Texas Clean Air Act (Texas Health and Safety Code, Chapter 382) and TCEQ Rules (Texas Administrative Code, Title 30, Part 1), including Chapters 101, 112, 113, and 116.

Nuisance, Animal Life, Vegetation, and Normal Use and Enjoyment of Property

Applicant's proposed emissions must meet the secondary National Ambient Air Quality Standards (NAAQS), which provide public welfare protection, including protection against damage to animals, crops, vegetation, and buildings. Applicant must also comply with the TCEQ rule concerning nuisance, which states, "No person shall discharge from any source whatsoever one or more air contaminants or combinations thereof, in such concentration and of such duration as are or may tend to be injurious to or to adversely affect

human health or welfare, animal life, vegetation, or property, or as to interfere with the normal use and enjoyment of animal life, vegetation, or property." 30 TAC § 101.4. Therefore, Issue Nos. 2 and 3 are relevant and material to the Commission's decision on this application.

Best Available Control Technology

Under the Texas Clean Air Act, Applicant is required to use BACT. TEX. HEALTH & SAFETY CODE § 382.0518(b)(l). Therefore, Issue No. 6 regarding BACT analysis and the use of BACT is relevant and material to the Commission's decision on this application.

Compliance History

The concerns regarding compliance history of the Applicant are relevant material under the Texas Water Code § 5.754(i). Therefore, Issue No. 10 is relevant and material.

Water Quality

The water quality issue falls outside the scope of review of this application for an air permit. Therefore, Issue No. 12 is not relevant and material to the decision on this application.

G. Issues Recommended for Referral

For the reasons stated above, OPIC recommends referral of the following issues.

1. Whether the draft permit will adversely affect air quality; human health and welfare, including sensitive receptors with preexisting health conditions; and the environment.
2. Whether the facility would interfere with use and enjoyment of property.

3. Whether the draft permit will adversely affect animal life, including endangered species and wildlife; vegetation; and property.
4. Whether the air dispersion modeling and evaluation of the surrounding area was adequate.
5. Whether emissions calculations were correct.
6. Whether the BACT (best available control technology) analysis was proper, and the draft permit will achieve the use of BACT.
7. Whether the allowance of chemical flexibility in the draft permit is appropriate.
8. Whether the draft permit's hours of operations are appropriate.
9. Whether the draft permit's monitoring and recordkeeping requirements are adequate to ensure compliance.
10. Whether the Applicant's compliance history justifies changes to the draft permit.
11. Whether the risk management plan requirement in the draft permit is adequate.

H. Maximum expected duration for the contested case hearing

Commission rule 30 TAC § 50.115(d) requires that any Commission order referring a case to SOAH specify the maximum expected duration of the hearing by stating a date by which the judge is expected to issue a proposal for decision. The rule further provides that, for applications filed on or after September 1, 2015, the administrative law judge must conclude the hearing and provide a proposal for decision by the 180th day after the first day of the preliminary hearing, or a date specified by the Commission, whichever is earlier. To assist the Commission in setting a date by which the judge is expected to issue a proposal for decision, and as required by 30 TAC § 55.209(e)(7), OPIC estimates

that the maximum expected duration of a hearing on this application should be 180 days from the first day of the preliminary hearing until the proposal for decision is issued.

V. Analysis of Requests for Reconsideration

The Commission received timely-filed requests for reconsideration from NSGA, Nicole Bauer, Jillian Gabriel, Richard Grabish, Alycen Malone, Timothy Mcdaniel, Karen Milone, Jennifer Spies, and Mike and Shannon Shannon White-Shubert. These requests raise concerns regarding potential impact on air quality, water quality, human health and welfare, environment, wildlife, livestock, and property values. The TCEQ does not have jurisdiction to consider concerns regarding property values. As discussed above, the water quality issue falls outside the scope of review of this application for an air permit. The remaining issues are within the Commission's jurisdiction to address in proceedings on this application. However, an evidentiary record would be necessary for OPIC to make a recommendation to the Commission as to whether the ED's decision should be reconsidered. At this time, OPIC is recommending a hearing on these issues, but prior to development of an evidentiary record, OPIC cannot recommend reversal of the ED's decision. Therefore, OPIC respectfully recommends denial of all pending requests for reconsideration.


VI. Conclusion

OPIC respectfully recommends the Commission find that the North San Gabriel Alliance, Elizabeth Friou, Suzanne Johnson, Charles McCormick,

Patricia Mulvihill, Sandra Thurman, Brittany Varner, Peggy and Harold Wardlaw, Mike and Shannon White-Shubert, and Haziell Williams are affected persons and grant their hearing requests. OPIC further recommends the Commission refer the relevant and material issues listed in Section IV.G for a contested case hearing at SOAH with a maximum duration of 180 days. Finally, OPIC respectfully recommends the Commission deny the remaining hearing requests and requests for reconsideration.


Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that on November 21, 2022, the foregoing document was filed with the TCEQ Chief Clerk, and copies were served to all parties on the attached mailing list via hand delivery, facsimile transmission, electronic mail, inter-agency mail, or by deposit in the U.S. Mail.


Pranjal M. Mehta

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Application Exhibit 36

Applicant Exflor Research Corporation's Response to Hearing Requests and Requests for Reconsideration

TCEQ DOCKET NO. 2022-1552-AIR

APPLICATION BY EXFLUOR § BEFORE THE
RESEARCH CORPORATION FOR §
AIR QUALITY PERMIT NO. 165848 § TEXAS COMMISSION ON
IN WILLIAMSON COUNTY, TEXAS § ENVIRONMENTAL QUALITY
§
§

APPLICANT EXFLUOR RESEARCH CORPORATION'S
RESPONSE TO HEARING REQUESTS AND REQUESTS FOR RECONSIDERATION

Exflur Research Corporation (“*Exflur*”) files this response to the Requests for Contested Case Hearing (the “*Hearing Requests*”) and “*Requests for Reconsideration*” on Exflur’s application (“*Application*”) submitted to the Texas Commission on Environmental Quality (“*TCEQ*”) for Proposed Air Quality Permit Number 165848 (“*Permit*”), which would authorize operations of a specialty chemical manufacturing facility in Williamson County, Texas (“*Exflur Facility*”). The site of the Exflur Facility would be located in a rural area approximately 15 miles west of Georgetown, Texas and 40 miles north of Austin, Texas.

In accordance with applicable legal standards and based on past precedent in other comparable matters, Exflur respectfully requests that the TCEQ Commissioners (the “*Commission*”) deny all requests for a contested case hearing (“*Hearing Requests*”) regarding the Application¹ from any person (“*Hearing Requester*”) who: (i) does not have a demonstrated personal justiciable interest within one mile of any emission points at the Exflur Facility, or (ii) who has not otherwise met all applicable requirements for a Hearing Request. Exflur does not object to the granting of Hearing Requests from Hearing Requesters with a demonstrated personal justiciable interest within one mile of the Exflur Facility if all other Hearing Requirements have been met, although impacts on those Hearing Requesters are not expected to be discernable.

¹ The mailing list included with the November 9, 2022 letter from the TCEQ Chief Clerk regarding consideration by the TCEQ Commissioners of the Hearing Requests, which has been filed with the Commission in this Docket, lists the hearing requesters.

Exflur also requests that all Requests for Reconsideration be denied, since none of the Requests for Reconsideration raise any issues which have not already been fully addressed, or they raise issues that are not relevant to the Application.

I. FACTUAL AND PROCEDURAL BACKGROUND.²

As explained on Exflur's website,³ Exflur was created in 1984 to develop a commercially viable method for conversion of hydrocarbons to fluorocarbons using elemental fluorine. Exflur's proprietary process uses fluorine gas to convert hydrocarbons to fluorocarbons while keeping the carbon-carbon backbone of the molecule intact. At its inception, Exflur concentrated its efforts on contract research mainly for the National Aeronautics and Space Administration and the United States Air Force developing specialty space lubricants, nonflammable hydraulic fluids, and specialty coatings. In the early 1990s, Exflur adapted its unique fluorination process to manufacturing specialty fluorinated chemicals, and has over 25 U.S. patents covering its fluorination process and many of its fluorinated products. Exflur currently operates a facility in Round Rock, Texas pursuant to TCEQ authorizations and a Pollution Prevention Plan.

As explained in the affidavit attached hereto as **Attachment "A"** from Joerg Windolph, Principal Engineer for Waid Environmental ("*Waid*") who prepared the Application, no pollutants would be emitted from the Exflur Facility at rates above what the U.S. Environmental Protection Agency ("*EPA*") considers to be a significant emission rate. Thus, EPA's "*major NSR*" permitting program does not apply. However, TCEQ's "*minor NSR*" permitting program still applies to Exflur's Application as based on TCEQ's minor NSR requirements.

² The background relating to procedural steps is consistent with electronic records available in the Commissioner's Integrated Database and largely duplicative of the TCEQ Executive Director's ("*TCEQ ED's*") Response to Public Comment ("*RTC*") relating to the Application, which has been filed with the Commission in this docket.

³ See: <https://exflur.com/pages/about-us>

The Application to authorize emissions for Exflur Facility was received by TCEQ on July 9, 2021 and declared administratively complete on July 14, 2021. The Notice of Receipt and Intent to Obtain an Air Quality Permit (first notice or “*NORI*”) was published in English on July 28, 2021 and in Spanish on July 29, 2021. The Notice of Application and Preliminary Decision (second notice or “*NAPD*”) was published in English on March 6, 2022 and in Spanish on March 10, 2022. An Amended Consolidated *NORI* and *NAPD* was published in English on May 4, 2022 and in Spanish on May 19, 2022. A public meeting was held on June 16, 2022, in Florence, Texas. The public comment period ended on June 20, 2022. The TCEQ Executive Director’s (“*TCEQ ED*’s”) final decision letter that the Application meets requirements of applicable law and the TCEQ ED’s Response to Comments (“*RTC*”) was mailed on September 13, 2022, and the deadline for submission of Requests for Reconsideration and for a contested case hearing was due on October 13, 2022.

II. APPLICABLE LAW FOR HEARING REQUESTS AND REQUESTS FOR RECONSIDERATION⁴

Availability of a contested case hearing in TCEQ’s permitting process is determined by several basic requirements. First, and foremost, *only* the Commission, the TCEQ ED, the applicant, or an *affected person* when authorized by law may request a contested case hearing.⁵ A hearing request by an *affected person* must be in writing, must be *timely filed* no later than 30 days after mailing of the ED’s decision and *RTC*, may not be based on an issue raised in a public

⁴ The Hearing Requests and Commission decisions regarding the Hearing Requests for the Application in this case are governed primarily by statutory provisions in TEX. GOV’T CODE § 2003.047, TEX. HEALTH & SAFETY CODE § 382.056, and TEX. WATER CODE §§ 5.115, and 5.556 which are implemented by various provisions in TCEQ’s rules, including primarily 30 TEX. ADMIN. CODE, CHAPTER 39, CHAPTER 50, SUBCHAPTER F and CHAPTER 55, SUBCHAPTER F. In the interest of efficiency and since TCEQ’s rules comprehensively encompass all relevant statutory provisions, only provisions of TCEQ’s rules which relate to applications filed after September 1, 2015 which govern the Application in this case are cited herein unless otherwise expressly noted. Because various provisions of TCEQ’s rules overlap and are duplicative but consistent, every applicable TCEQ rule is not cited where various overlapping TCEQ rules apply.

⁵ See 30 TEX. ADMIN. CODE § 55.201(b).

comment that was withdrawn, and must be based on the hearing requestor's own timely comments, and must be relevant and material to the application.⁶

Second, a Hearing Request must identify all relevant and material disputed issues of fact or mixed questions of law and fact that were raised during the comment period and that form the basis of the request for a contested case hearing.⁷ The Commission may not refer an issue to SOAH for a contested case hearing unless the Commission determines that the issue:

- (1) Involves a disputed question of fact or a mixed question of law and fact;
- (2) Was raised during the public comment period, and, for applications filed on or after September 1, 2015, was raised in a comment made by an affected person whose request is granted; and
- (3) Is relevant and material to the decision on the application.⁸

Even if a Hearing Request has met all of the procedural elements, the Commission may not grant a Hearing Request unless the Commission first determines that the request was filed by an affected person.⁹ An affected person is:

[O]ne who has a personal justiciable interest related to a legal right, duty, privilege, power, or economic interest affected by the application. An interest common to members of the general public does not qualify as a personal justiciable interest.¹⁰

In applying the personal justiciable interest test to determine if a hearing requestor is an affected person, the Commission must consider the following factors:

- (1) Whether the interest claimed is one protected by the law under which the application will be considered;
- (2) Distance restrictions or other limitations imposed by law on the affected interest;
- (3) Whether a reasonable relationship exists between the interest claimed and the activity regulated;
- (4) Likely impact of the regulated activity on the health and safety of the person, and on the use of property of the person;

⁶ *Id.* § 55.201(c) (emphasis added).

⁷ *Id.* § 55.211(c)(2)(A)(ii).

⁸ *Id.* § 50.115(c) (emphasis added).

⁹ *Id.* §§ 55.201(b)(4), 55.211(c)(2)(A)(ii) (emphasis added) (The Commission, the TCEQ ED or an applicant may also request a contested case hearing, but no such request has been submitted).

¹⁰ *Id.* § 55.203(a) (emphasis added).

- (5) *Likely impact* of the regulated activity on use of the impacted natural resource by the person;
- (6) For a hearing request on an application filed on or after September 1, 2015, *whether the requestor timely submitted comments* on the application that were not withdrawn; and
- (7) For governmental entities, their statutory authority over or interest in the issues relevant to the application.¹¹

In addition, for this Application, filed after September 1, 2015, the Commission may consider additional factors in determining whether a person is an *affected person*:

- (1) The merits of the underlying application and supporting documentation in the commission's administrative record, including whether the application meets the requirements for permit issuance;
- (2) The analysis and opinions of the executive director; and
- (3) Any other expert reports, affidavits, opinions, or data submitted by the executive director, the applicant, or hearing requestor.¹²

As explained above, only an *affected person* who has a *personal justiciable interest* related to a legal right, duty, privilege, power, or economic interest affected by the application has a lawful right to possibly qualify for a contested case hearing.¹³ In determining whether a person has a *personal justiciable interest*, the Commission has by rule provided a comprehensive list of relevant factors which can be considered.¹⁴

A. HEARING REQUESTERS WITH A CLAIMED INTEREST FURTHER THAN ONE MILE FROM THE PROPOSED EXFLUOR FACILITY DO NOT HAVE A PERSONAL JUSTICIABLE INTEREST

A primary test regarding whether a hearing requestor has established a personal justiciable interest in a TCEQ air application is the distance from the facilities which would be authorized to emit air contaminants. The sound reasoning for applying the distance test has been repeated again

¹¹ *Id.* § 55.203(c) (emphasis added).

¹² *Id.* § 55.203(d).

¹³ *Id.* § 55.203(a).

¹⁴ *Id.* § 55.203(c).

and again in the TCEQ ED's briefing documents for well over a decade. For example, the TCEQ ED has consistently taken the position that:

For air authorizations, distance from the proposed facility is particularly relevant to the issue of whether there is a likely impact of the regulated activity on a person's interests because of the dispersion and effects of individual air contaminants emitted from a facility. The natural resource that is the subject of this permit is the ambient air an individual breathes and, given the distance of [the hearing requestor] from the relative location of the proposed facility, his health and safety would not be impacted in a manner different from the general public."¹⁵

...
For air authorizations, distance from the proposed facility is particularly relevant to the issue of whether there is a likely impact of the regulated activity on a person's interests because of the dispersion and effects of individual air contaminants emitted from a facility. The natural resource that is the subject of this permit is the ambient air that the requesters breathe, and they have indicated a manner in which emissions from the plant could impact it. Because distance from the proposed facility is key to the issue of whether there is a likely impact of the regulated activity on a person's interests such as the health and safety of the person, and on the use of property of the person, the [TCEQ ED] has identified an area of approximately 1 mile from the proposed facility on the provided map.¹⁶

...
Emissions from this facility are expected to disperse in the air as the distance from the emissions point increases, thus distance from the proposed facility is key to the issue of whether or not there is a likely impact of the regulated activity on a person's interest (such as the health and safety of the person) and the use of property of the person. The Executive Director has generally determined that hearing requestors who reside greater than one mile from the facility are not likely to be impacted differently than any other member of the general public.¹⁷

...
Further, for air quality permits, distance from the proposed plant is particularly relevant to the issue of whether there is a likely impact of the regulated activity on a person's interests because of the dispersion and effects of individual air contaminants emitted from a plant.¹⁸

¹⁵ Executive Director's Response to Hearing Requests, Application by Lhoist North America of Texas, LLC (formerly known as Lhoist North America of Texas, Ltd), to amend Air Quality Permit No. 9009, TCEQ Docket No. 2020-0406-AIR (Commission Agenda date April 22, 2020).

¹⁶ Executive Director's Response to Hearing Requests, Application by Citgo Refining and Chemical Company L.P. for the amendment of Air Quality Permit Nos. 3123A and 9604A, TCEQ Docket No. 2020-07166-AIR (Commission Agenda date August 12, 2020) (emphasis added).

¹⁷ Executive Director's Response to Hearing Requests, Application by Regency Field Services, L.L.C. for Renewal of Air Quality Permit No. 6051 and PSDTX55M3, TCEQ Docket No. 2010-0843-AIR (Commission Agenda date July 28, 2010) (emphasis added).

¹⁸ Executive Director's Response to Hearing Requests and Requests for Reconsideration, Application by Max Midstream Texas, L.L.C. for Air Quality Permit No. 162941, TCEQ Docket No. 2022-0157-AIR (Commission Agenda date March 30, 2022).

The Commission has not created a *de facto* one-mile standard to determine whether a hearing requester is an affected person with a personal justiciable interest. Instead, the determination is based on a fact specific evaluation of the permit, including the type and volume of emissions that is used to determine the likely impact that the facility will have on a specific requester that is not common to the general public.¹⁹ Particular recognition has been given where emissions authorized by a minor NSR air permit would be less impactful,²⁰ which as explained above are applications for authorizations for which pollutants would not be authorized above rates considered to be significant.

Based on a survey of Commission decisions on hearing requests for all TCEQ air applications in the last two and a half years, the Commission has recently denied hearing requests for which the hearing requestor claimed to own property 1.21 miles, 1.36, miles and 1.51 miles away from the proposed facilities.²¹ The closest property interest claimed in a hearing request for a TCEQ air application for which the Commission has granted a hearing request in the last two and one half years is 1.13 miles.²²

The mapping included in the Affidavit of Joerg Windolph, Principal Engineer at Waid Environmental (“*Windolph Affidavit*”), which is attached hereto as **Attachment “A”** shows the location of the claimed property interests of all of the Hearing Requesters, based in part on records publicly available from the Williamson County Appraisal District (“*WCAD*”). As explained in Windolph’s Affidavit, even for those Hearing Requesters who do have a property interest within

¹⁹ *Application by Max Midstream Texas, L.L.C. for Air Quality Permit No. 162941*, TCEQ Docket No. 2022-0157-AIR (Commission Agenda date March 30, 2022), TCEQ Open Meeting Recording for Wednesday, March 30, 2022, New Business Item 1, available at <https://www.youtube.com/watch?v=-F8wR0ZJH-g&list=PLwzfZK5z8LrHUGDFJkoH6FJ4xpbT9bgKK&index=6>, at 8:15-9:02 (emphasis added).

²⁰ *Id.*

²¹ *See supra, Application by Holcim (US) Inc. for Air Quality Permit Nos. 8996 and PSDTX454M5*, TCEQ Docket No. 2021-0051-AIR.

²² *See supra, Application by Martin Marietta Materials Southwest, LLC, for amendment and renewal of Air Quality Permit No. 41849*, TCEQ Docket No. 2021-0054-AIR.

one mile, based on atmospheric dispersion modeling following TCEQ and EPA protocols, no air contaminant concentrations were predicted which would be authorized by the Permit that would exceed any state or federal standards or Effects Screening Level (“*ESL*”) at the claimed property interest located within one mile. Further, as explained in the Affidavit of Lucy Fraiser, Ph.D., DABT, Fraiser Toxicology Consulting LLC (“*Fraiser Affidavit*”), which is attached hereto as **Attachment B**, discernible impacts are not expected on Hearing Requesters who claim an interest within one mile of Exflur’s Facility from any pollutant for which authorization is requested by the Application, and at greater distances than one mile, potential impacts are expected to be even less.

B. HEARING REQUESTS MUST SHOW A LIKELY, CONCRETE IMPACT THAT IS NOT HYPOTHETICAL OR SPECULATIVE

The “*Likely impact* of the regulated activity on the health and safety of the person, and on the use of property of the person” and the “*Likely impact* of the regulated activity on use of the impacted natural resource by the person” are key considerations in applying the *personal justiciable interest test* to determine if a hearing requestor is an *affected person*.²³ Alleged injuries “couched in terms of *potentialities* or events that “*may*” happen” are “*mere speculation, and as such, it falls short of establishing a justiciable interest and standing*.”²⁴

[To] have such an interest, the complainant must show that a *concrete, particularized, actual or imminent injury* faces him due to the decision; a *hypothetical or speculative injury is not enough*.²⁵

²³ See 30 TEX. ADMIN. CODE § 55.203(c)(4) and (5) (emphasis added).

²⁴ *Texas Disposal Systems Landfill, Inc. v. Texas Comm’n on Envtl. Quality*, 259 S.W.3d 361, 363-64 (Tex.App.—Amarillo 2008, no pet.) (emphasis added).

²⁵ *Id.* at 363 (emphasis added).

Further, the Austin Court of Appeals has determined that it is reasonable to conclude that hearing requestors are not affected persons if the proposed “activity will have minimal effect on their health, safety, use of property, and use of natural resources.”²⁶

The Fraiser Affidavit explains that the air emissions which would be authorized by the Application for the Exflur Facility would comply with all applicable state and federal air quality requirements, which are conservatively designed to be protective of public health and welfare. As also explained in the Fraiser Affidavit, air concentrations predicted from the proposed emissions from the Exflur Facilities for all but one contaminant are well below applicable health-based standards, and for the one contaminant that exceeds an ESL, additional evaluation reflects the likelihood of health or welfare effects is extremely small and only at a location where no Hearing Requester has claimed a property interest.

The conclusions in the Fraiser Affidavit are completely in line with and fully support following Commission’s precedent in this case and finding that interests one mile or further from a proposed air emissions source cannot support granting of a hearing request.²⁷ The absence of impact explained in the Fraiser Affidavit shows that there is no tangible, technical reason why a person with a purported interest one mile or further from the Exflur Facilities could be an affected person for purposes of the Application in this case. There is no likely impact.

C. HEARING REQUEUSTS CANNOT BE GRANTED UNLESS THE SPECIFIC, REQUIRED INFORMATION IS INCLUDED

As discussed above, a person cannot establish a personal justiciable interest unless they have raised in a timely comment and asserted in a timely hearing request (and made a

²⁶ See *Tex. Comm'n on Envtl. Quality v. Sierra Club*, 455 S.W.3d 228, 240 (Tex. App. – Austin 2014) (emphasis added).

²⁷ Exflur is aware of certain matters in which parties with an interest further than one mile from an air emissions source have been admitted by the State Office of Administrative Hearings as parties to a contested case hearing, although in those cases, the applicant did not object or an Administrative Law Judge may have made the decision in a manner differently than the Commission has historically done.

demonstration) that the permit if issued would have a likely impact on the hearing requestor that is more than minimal. In addition, TCEQ's rules clearly require that a hearing request should be denied if it fails to include certain basic information.²⁸ TCEQ's rules are clear that a hearing request must substantially comply with the following specific requirements:

- (1) Give the name, address, daytime telephone number, and, where possible, fax number of the person who files the request. . . .
- (2) Identify the person's personal justiciable interest affected by the application, including a brief, but specific, written statement explaining in plain language the requestor's location and distance relative to the proposed facility or activity that is the subject of the application and how and why the requestor believes he or she will be adversely affected by the proposed facility or activity in a manner not common to members of the general public.²⁹

Thus, the failure of any Hearing Request to meet the basic, specific requirements renders the hearing request *incurably deficient*.

D. HEARING REQUESTS FROM A GROUP OR ASSOCIATION

In addition to the rules and requirements identified above for Hearing Requests submitted by individuals, TCEQ's rules include specific requirements for a Hearing Request submitted by a group or association:

- (a) A group or association may request a contested case hearing only if the group or association meets all of the following requirements:
 - (1) one or more members of the group or association would otherwise have standing to request a hearing in their own right;
 - (2) the interests the group or association seeks to protect are germane to the organization's purpose; and
 - (3) neither the claim asserted nor the relief requested requires the participation of the individual members in the case.
- (b) For applications filed on or after September 1, 2015, a request by a group or association for a contested case may not be granted unless all of the following requirements are met:

²⁸ 30 TEX. ADMIN. CODE § 55.211(b)(2) (denial based on failure to meet the requirements); 30 TEX. ADMIN. CODE § 55.211(c)(2)(D) (must be granted but must comply with 55.201).

²⁹ 55.201(d) (emphasis added).

- (1) comments on the application are timely submitted by the group or association;
- (2) the request identifies, by name and physical address, one or more members of the group or association that would otherwise have standing to request a hearing in their own right;
- (3) the interests the group or association seeks to protect are germane to the organization's purpose; and
- (4) neither the claim asserted, nor the relief requested, requires the participation of the individual members in the case.³⁰

E. REQUESTS FOR RECONSIDERATION

A Request for Reconsideration must be in writing, must be timely filed with the chief clerk, must expressly state that the person is requesting reconsideration of the TCEQ ED's decision, and must give reasons why the requestor believes the decision should be reconsidered.³¹ Reconsideration Requests should also contain the name, address, and daytime telephone number of the person who files the request.³² None of the Requests for Reconsideration in this case raise a material fact issue or identify a basis upon which the TCEQ ED's decision to issue Exflur's Permit should be reconsidered. As explained in detail below, each issue raised in each of the Requests for Reconsideration was fully addressed and evaluated as indicated in the TCEQ ED's RTC, and/or the issue is not relevant in any way to Exflur's Application.

III. IMPLEMENTATION OF THE APPLICABLE LAW TO THE HEARING REQUESTS AND REQUESTS FOR RECONSIDERATION ON THE APPLICATION FOR THE EXFLUOR FACILITY

1. North San Gabriel Alliance ("NSGA").

NSGA is the only group or association that submitted Hearing Requests or a Request for Reconsideration on Exflur's Application. In its several Hearing Requests, NSGA provided a very

³⁰ *Id.* § 55.205 (emphasis added).

³¹ *Id.* § 55.201(e); *see also, e.g., Fisherman's Harvest, Inc. v. Post, Buckley, Schuh & Jernigan, Inc., et al.*, No. G-05-0151 (S.D. Tex. 2008), 2008 WL 4277001 at 2 (explaining that a motion for reconsideration is appropriate to address an intervening change in controlling law; to consider new evidence not previously available; correct a clear or manifest error of law or fact; or to prevent manifest injustice).

³² *Id.* § 55.201(e).

generalized purpose with interests that could purportedly be impacted by Exflur's Permit, although it did not provide any bylaws or other documentation other than its generalized statements about its overall purpose. Thus, NSGA has not sufficiently demonstrated with specificity that it has an interest that it seeks to protect that is germane to the NSGA's purpose. NSGA identified the following purported members with a claimed personal justiciable interest in Exflur's Application:

Patricia McCormick Mulvihill is identified in the April 1, 2022, June 3, 2022 and October 13, 2022 NSGA Hearing Request as Trustee for a property purportedly located 0.67 miles north of the property boundary of where the Exflur Facility is located, which appears to coincide with Map Parcel ID No 20 and/or 21 included with the mapping in **Attachment "A"**, which the WCAD indicates is owned by the Mulvihill Children's Trust, with Henry N., Mulvihill, Jr. & Patricia McCormick Mulvihill as Trustees. However, a clear property interest has not been demonstrated based on the lack of clarity, and no documentation verifying that the Patricia McCormick Mulvihill identified as a member of NSGA is the same person as the trustee identified by the WCAD.

Bryce Phillip McCormick is identified in the April 1, 2022 and June 3, 2022 NSGA Hearing Request as having property interests approximately 0.9 miles north of the property boundary of where the Exflur Facility is located, although WCAD records for property indicate that property which appears to coincide with two parcels described as Map Parcel ID No. 15 included with the mapping in **Attachment "A"** is owned by Bryce Phillip McCormick, Jr. or Bryce Phillip McCormick, Jr. and Carolyn G. McCormick. However, a clear property interest has not been demonstrated based on the lack of clarity, whether the Bryce Phillip McCormick, Jr. described in the WCAD records is the same as the Bryce Phillip McCormick identified as a NSGA member, and no documentation has been provided.

Ann Friou is identified in the June 3, 2022 NSGA Hearing Request as having approximately 350 acres of property directly across County Road 236 from the property boundary of where the Exflur Facility is located. Although property described as owned by Ms. Friou appears to coincide with the property described as Map Parcel ID No 5 in the mapping included in **Attachment "A"**, the WCAD indicates these parcels of property are actually owned by Ann Wheelock Friou Individually and as the Independent Executor of the Estate of Thomas Friou as Trustee and by Ann Wheelock Friou Individually and as the Independent Executor of the Estate of Thomas Friou as Trustee. As discussed below, multiple other Hearing Requests claiming an ownership in the very same properties were submitted by Elizabeth Ann Friou. Thus, the NSGA Hearing Request has not sufficiently demonstrated that the Ann Friou who NSGA claims as a member is the true owner of the property identified in the Hearing Request, and no documentation has been provided.

Charles Ray Williams, Jr. and Haziel McCormick Williams are identified in the October 13, 2022 NSGA Hearing Request as having property interests in property purportedly 0.7 and 0.9 miles from the emissions points for the Exflur Facility. Parcels of property which appear to coincide with the property describe in the Hearing Request are described as Map Parcel ID No 31 in the mapping included in **Attachment “A”**, which according to the WCAD are both owned by Haziel Roberta McCormick Williams. It is not clear that the property owner identified in the WCAD is the same as the Haziel McCormick Williams who has been named as a member of NSGA.

Margaret Peggy Anne McCormick Wardlaw is identified in the October 13, 2022 NSGA Hearing Request as having an interest in the McCormick Children’s Family Limited Partnership (“**FLP**”), which purportedly owns a tract 0.8 miles from the property boundary of where the Exflur Facility would be located, and ownership in another parcel 0.85 miles away. Parcels of property which appear to coincide with the FLP property described in the Hearing Request is described as Map Parcel ID No 32 in the mapping included in **Attachment “A”**, which according to the WCAD is owned by FLP. However, no supporting documentation has been provided to make a sufficient demonstration regarding ownership of and/or interests in either parcel of property.

Referrable Issues: If the Commission determines that NSGA has submitted sufficient information to demonstrate that its purpose is germane to the Application, and that one or more of named members has a legal property interest as identified in the Hearing Requests, Exflur has modified further below the list of issues recommended for referral in NSGA’s October 13, 2022 Hearing Request letter.

Request for Reconsideration. To the extent any of NSGA’s October 13, 2022 Hearing Requests could also be construed to include a Request for Reconsideration, NSGA did not raise any issues that are relevant and material to Exflur’s Application before issuance of the TCEQ ED’s RTC which was not thoroughly addressed by the TCEQ ED’s RTC, and nothing new was raised in the NSGA’s October 13, 2022 Hearing Request and Request for Reconsideration after issuance of the TCEQ ED’s RTC which they had not already raised.

The following Hearing Requests and Requests for Reconsideration were received on Exflur’s Application from individuals:

2. **Nicole Elizabeth Bauer**
800 Hidden Bear Rd.
Liberty Hill, TX 78642-4634

Ms. Bauer raises issues generally relating to air emissions and water contamination reaching her property that may be harmful. Although the Hearing Request was timely received on October 13, 2022, it cannot be granted because the Hearing Requester is not an affected person because the only personal justiciable interest stated is based on purported property ownership 25 miles northwest of the property boundary where the Exflur Facility would be located. Although the mapping included in **Attachment “A”**

identifies the location of the address in the Hearing Request as being several miles south of the Exflur Facility, as shown on Map Parcel ID No 1, Waid was unable to confirm via CAD records that they own the property, but in either event the only purported interest stated is much further than one mile away by several miles. In addition, because Ms. Bauer did not submit any comments, none of the issues raised can be referred to a contested case hearing because they are not based on timely filed comments raised by the Hearing Requester during the comment period, and the water related issues are not relevant and material to the application.

Request for Reconsideration. Although Ms. Bauer's Request for Reconsideration was timely received on October 13, 2022, it cannot be granted because the water related issues raised do not identify a material fact issue or identify a basis upon which the TCEQ ED's decision to issue Exflur's Permit should be reconsidered, since water related issues are not relevant to an application for a minor NSR air permit.

**3. Anne & Thomas Beville, Jr.
443 County Road 278
Liberty Hill, TX 78642-4378**

The Bevilles raise issues generally relating to air emissions and water contamination reaching their property that may be harmful. Although this Hearing Request was timely received on October 12, 2022, this Hearing Request cannot be granted because the Hearing Requesters are not affected persons because the only purported personal justiciable interest stated is based on property ownership 12 miles south of the Exflur Facility, which is described as Map Parcel ID No 2 in the mapping included in **Attachment "A"**. Waid was unable to confirm via CAD records that they own the property, and none of the issues raised can be referred to a contested case hearing because the only issue raised in a comment timely filed by the Bevilles is a water related issue, which is not relevant and material to an application for a minor NSR air permit.

**4. Terry G. Cook
Commissioner, Williamson County Precinct 1
1801 E Old Settlers Blvd Ste 110
Round Rock, TX 78664-1905**

Commissioner Cook raises issues generally relating to air emissions and waste management and about clarification of questions relating to manufacturing of chemicals. Although Commissioner Cook alleges that the Hearing Request was completed on October 13, 2022, it was received after the October 13, 2022 deadline. Even if the Hearing Request would have been timely received, it cannot be granted because the Hearing Requester is not an affected person because no personal justiciable interest is stated, and none of the issues raised can be referred to a contested case hearing because they are not based on timely filed comments raised by the Hearing Requester during the comment period.

5. Ms. Sheryl Marie Farley

**6600 County Road 200
Liberty Hill, TX 78642-3725**

Ms. Farley raises issues relating generally to locating an industrial facility in a non-industrial area, regarding air emissions reaching her property that may be harmful, and regarding water contamination in general. Although this Hearing Request was timely received on October 12, 2022, this Hearing Request cannot be granted because the Hearing Requester is not an affected person because the only purported personal justiciable interest stated is based on property ownership 3 miles south of the property boundary where the Exflur Facility would be located, which is described as Map Parcel ID No 4 in the mapping included in **Attachment “A”**. Waid was unable to confirm via CAD records that they own the property, and Ms. Farley did not raise any discernible air related issues in her previously filed comments on May 2, 2022 or on April 6, 2022 that are relevant to an application for a minor NSR air permit.

Request for Reconsideration. To the extent Ms. Farley’s May 2, 2022 comment might be construed to be a Request for Reconsideration (which Exflur does not believe it is), it cannot be granted because only issues raised relate generally to locating an industrial facility in a non-industrial area, which is not relevant and material to the Application.

**6. Elizabeth Ann Friou
5203 Ridge Oak Dr.
Austin, TX 78731-4811**

As explained above, NSGA named Ms. Friou as a member of NSGA. In her Hearing Requests, Ms. Friou states that she owns property adjacent to the property where the Exflur Facility would be located, across from Williamson County Road 236, which appears to be the property described as Map Parcel ID No 5 in the mapping included in **Attachment “A”**, although as discussed below, the Hearing Request does not demonstrate that Ms. Friou owns the property.

She submitted timely comments and Hearing Requests on June 19, 2022, May 10, 2022, May 2, 2022, April 6, 2022, and April 5, 2022, and provided oral comments at the Public Meeting on June 16, 2022. She raised issues relating to water, and whether permitted or unpermitted air emissions will be protective of her land and her health, the health of her employees, livestock and wildlife.

Graves Dougherty Hearon & Moody submitted an additional Hearing Request on behalf of Ms. Friou on October 11, 2022, and identified parcels of property as being owned by Ms. Friou which appear to be the property described as Map Parcel ID No 5 in the mapping included in **Attachment “A”**. However, the WCAD indicates these properties are actually owned by *Ann Wheelock Friou Individually and as Trustee of the Thomas Claborne Friou Family Trust*, and by *Ann Wheelock Friou Individually and as the Independent Executor of the Estate of Thomas Friou as Trustee*. Thus, Ms. Elizabeth Ann Friou who submitted the Hearing Request has not demonstrated that she is the owner of the property upon which

her personal justiciable interest is based, and therefore cannot be granted a contested case hearing.

Referrable Issues: If the Commission determines that Ms. Friou has submitted sufficient information to demonstrate a personal justiciable interest, Exflur has modified further below the list of issues recommended referral in Ms. Friou's Hearing Request dated October 13, 2022.

7. **Jillian Gabriel**
105 Lark St
Leander, TX 78641-1890

Request for Reconsideration. Ms. Gabriel did not submit a Hearing Request. Although Ms. Gabriel's Request for Reconsideration was timely received on April 16, 2022, it cannot be granted because the generalized issues raised relating to compliance history, pollution and land use have been fully considered and addressed, and/or is not relevant and material to an application for a minor NSR air permit. *See e.g.*, RTC Responses 5, 6, 10 and 21.

8. **Richard Grabish**
201 Shady Oaks Trl
Liberty Hill, TX 78642-3944

Request for Reconsideration. Mr. Grabish did not submit a Hearing Request. Although Mr. Grabish's Request for Reconsideration was timely received on April 6, 2022, it cannot be granted because the generalized issues raised relating to pollution and land use have been fully considered and addressed, and/or is not relevant and material to an application for a minor NSR air permit. *See e.g.*, RTC Responses 5, 6, 10, 18 and 21.

9. **Kelley Heath**
205 Talon Grasp Trl
Leander, TX 78641-2595

Kelley Heath raises generalized issues in the Hearing Request relating to air emissions and water contamination reaching her property that may be harmful. Although the Hearing Request was timely received on October 11, 2022, it cannot be granted because the Hearing Requester is not an affected person because the only personal justiciable interest stated is based on purported property ownership, and although the mapping included in **Attachment "A"** identifies the location of the address in the Hearing Request as being in Leander, Texas, which is over approximately 20 miles from the Exflur Facility, as shown on Map Parcel ID No 8. Waid was unable to confirm via CAD records that they own the property, but in any event the only purported interest stated is much further than one mile away by several miles.

**10. Suzanne Johnson
Johnson Woods Company
1400 County Road 236
Florence, TX 76527-4918**

Ms. Johnson raises issues in her Hearing Request generally relating to air emissions and concerns regarding chemicals. Ms. Johnson's purported property ownership which appears to be within one mile of the property boundary where the Exflur Facility would be located, as indicated on the mapping included in **Attachment "A"** as Map Parcel ID No 9. However, although the Hearing Request was timely received on October 13, 2022, it cannot be granted because none of the issues raised can be referred to a contested case hearing because they are not based on timely filed comments raised by the Hearing Requester during the comment period. Her comments on April 11, 2022 were only generalized comments regarding health concerns and no discernible issue related to air emissions was stated.

Referrable Issues: If the Commission determines that Ms. Johnson has submitted sufficient comments to support her Hearing Request, the only referrable issue is as follows: Whether the Draft Permit is protective of air quality, human health and welfare, and the environment.

**11. Catherine Johnston
4960 Highway 138
Florence, TX 76527-4901**

Ms. Johnston does not clearly raise any issues in her Hearing Request, other than a generalized concern regarding chemicals, although a letter from a third party was attached also raising general concerns about chemicals, and referencing air emissions from Exflur's Facility. Although the Hearing Request was timely received on October 13, 2022, it cannot be granted because the Hearing Requester is not an affected person because no personal justiciable interest is stated, and Ms. Johnston's address as shown on the mapping included in **Attachment "A"** is Map Parcel ID No 10, which is several miles away from the property where the Exflur Facility would be located. Even if the generalized issues raised regarding chemicals and air emissions were specific enough for referral, which they are not, the issues are also not based on timely filed comments raised by the Hearing Requester during the comment period in her comments submitted on April 10, 2022 and April 7, 2022.

**12. Alycen Malone
158 Barn Owl Loop
Leander, TX 78641-1881**

Request for Reconsideration. Ms. Malone did not submit a Hearing Request. Although Ms. Malone's Request for Reconsideration was timely received on September 27, 2022, it cannot be granted because the generalized issues raised relating to pollution and land use

have been fully considered and addressed, and/or is not relevant and material to an application for a minor NSR air permit. *See e.g.*, RTC Responses 5, 6, 10, 18 and 24.

**13. Charles Ely McCormick
440 W Pleasantview Dr
Hurst, TX 76054-3504**

Mr. Charles Ely McCormick raises issues in his Hearing Request generally relating to air emissions and water contamination reaching his property that may be harmful. Mr. McCormick claims a property interest in 5 acres 0.6 miles north of the Exflur Facility, which appears to coincide with the mapping included in **Attachment “A”** as Map Parcel ID No 12. However, although the Hearing Request was timely received on October 13, 2022, it cannot be granted because Mr. Charles Ely McCormick did not submit any comments during the comment period to support his Hearing Request.

**14. Charles McCormick
2035 Woodglen Dr
Round Rock, TX 78681-2605**

Mr. Charles McCormick raises issues in his Hearing Request relating to an exhaust monitoring system with alarms. Mr. McCormick claims a property interest in 30 acres on County Road 208 approximately 0.6 miles north of the Exflur Facility. Although the WCAD indicates that a Charles Oneal McCormick with the same address listed in the Hearing Request appears to coincide with the mapping included in **Attachment “A”** as Map Parcel ID No 13, the parcel is less than 5 acres. Thus, it has not been demonstrated that Mr. McCormick has a sufficient property interest.

Referrable Issues: If the Commission determines that Mr. McCormick has submitted sufficient information to demonstrate a personal justiciable interest, the only issue that should be referred is as follows: Should an exhaust monitoring system that measures and records emissions in real time with alarms to alert emergency services be installed?

**15. Erin McCormick
19926 Park Hollow
San Antonio, TX 78259-1924**

Erin McCormick raises issues in two substantially similar Hearing Requests (providing different addresses for each) submitted on the same day generally relating to air emissions, potential contamination and a prior incident at Exflur’s Round Rock site. Erin McCormick claims a property interest in a tract of land 0.6 miles north of the Exflur Facility, which appears to coincide with the mapping included in **Attachment “A”** as Map Parcel ID No 14, which the WCAD indicates is owned by Erin Marie McCormick. However, although the Hearing Requests were timely received on October 13, 2022, they cannot be granted because Erin McCormick did not submit any comments during the comment period to support the Hearing Requests.

- 16. Erin McCormick**
1250 County Road 208
Florence, TX 76527-4628

See the above evaluation of the Hearing Request submitted from Erin McCormick, with an address in San Antonio, Texas. According to the WCAD, the Florence, Texas address provided with this hearing request coincides with the mapping included in **Attachment “A”** as Map Parcel ID No 15. However, Waid has determined that the property associated with Map Parcel ID No 15 is owned by Bryce Phillip McCormick, Jr. or Bryce Phillip McCormick, Jr. and Carolyn G. McCormick. Further, the Hearing Request is not supported by a timely filed comment and cannot be granted.

- 17. Joyce McCormick**
2301 Ohlen Rd
Austin, TX 78757-7758

Joyce McCormick raises issues in her Hearing Request generally relating to air emissions and water contamination reaching her property that may be harmful. Ms. McCormick claims a property interest in 7 acres 0.6 miles north of the Exfluor Facility, which appears to coincide with the mapping included in **Attachment “A”** as Map Parcel ID No 16, which the WCAD indicates is owned by *Joyce Kelly McCormick*. However, although the Hearing Request was timely received on October 13, 2022, it cannot be granted because Ms. Joyce McCormick did not submit any comments during the comment period to support her Hearing Request.

- 18. Nickolas McCormick**
1050 County Road 208
Florence, TX 76527-4277

Nickolas McCormick raises issues in his Hearing Request generally relating to health concerns, compliance history, and generalized concerns about air emissions and water and land contamination that may be harmful. Mr. McCormick claims a property interest within 0.6 miles of the Exfluor Facility, which appears to coincide with the mapping included in **Attachment “A”** as Map Parcel ID No 17, which the WCAD indicates is an almost 7-acre parcel owned by *Nicholas James McCormick*. However, even if the landowner is the same as the Hearing Requester, and even though the Hearing Request was timely received on October 13, 2022, it cannot be granted because Mr. McCormick did not submit any comments during the comment period to support his Hearing Request.

- 19. Timothy McDaniel**
1800 County Road 208
Florence, TX 76527-4235

Request for Reconsideration. Mr. McDaniel did not submit a Hearing Request. Although Mr. McDaniel’s Request for Reconsideration was received on April 4, 2022, after the TCEQ ED’s first preliminary decision but before the TCEQ ED’s Final Decision, it cannot

be granted because the generalized issues raised relating to health and welfare and land use have been fully considered and addressed, and/or is not relevant and material to an application for a minor NSR air permit. *See e.g.*, RTC Responses 5, 6 and 18.

**20. Karen Milone
208 N Haven Dr
Liberty Hill, TX 78642-2387**

Request for Reconsideration. Ms. Malone did not submit a Hearing Request. Although Ms. Malone's Request for Reconsideration was received on April 4, 2022, after the TCEQ ED's first preliminary decision but before the TCEQ ED's Final Decision, it cannot be granted because the generalized issues raised relating to health and welfare and land use have been fully considered and addressed, and/or is not relevant and material to an application for a minor NSR air permit. *See e.g.*, RTC Responses 5, 6 and 18.

**21. Henry N. Mulvihill Jr.
PO Box 831945
Richardson, TX 75083-1945**

The only issue raised in Mr. Mulvihill's Hearing Request relates to land use issues, and he offers no personal justiciable interest. Although not mentioned in his Hearing Request, as explained above in the evaluation of the NSGA Hearing Request, Mr. McCormick appears to be a Trustee for property which appears to coincide with the mapping included in **Attachment "A"** as Map Parcel ID No 20 and 21 which is within one mile of the Exflur Facility. However, no documentation verifying that he is the trustee for the property has been provided. Further, TCEQ does not have jurisdiction regarding the only issue raised in his hearing request, as explained in RTC Response 18. Thus, the Hearing Request cannot be granted.

Request for Reconsideration. To the extent Mr. Mulvihill's March 28, 2022 comment could also be construed to include a Request for Reconsideration, it was received after the TCEQ ED's first preliminary decision but before the TCEQ ED's Final Decision, and therefore, it cannot be granted because the generalized issues raised relating to health and welfare, land use and water have been fully considered and addressed, and/or are not relevant and material to an application for a minor NSR air permit. *See e.g.*, RTC Responses 5, 6, 10 and 18.

**22. Patricia McCormick Mulvihill
North San Gabriel Alliance
8 Lundys Ln
Richardson, TX 75080-2343**

Patricia McCormick Mulvihill's Hearing Request raises generalized health concerns and concerns regarding the use of property for which she claims to be a Co-Trustee, which as explained in the evaluation of the NSGA Hearing Request, and the property appears to coincide with the mapping included in **Attachment "A"** as Map Parcel ID No 20 and 21,

which is within one mile of the Exflur Facility. However, no documentation verifying that Ms. McCormick is the Co-Trustee of the property has been provided. Further, although her only comment submitted on April 1, 2022 raises generalized concerns about air pollution, no mention is made of health concerns. Thus, the Hearing Request is not supported by a timely comment.

Referrable Issues: If the Commission determines that Ms. Mulvihill has submitted sufficient information to demonstrate a personal justiciable interest, that a referrable issue has been supported by a comment, and that an issue could be stated with specificity, the only issue that should be referred is as follows: Whether the Draft Permit is protective of air quality, human health and welfare, and the environment.

Request for Reconsideration. To the extent Ms. Mulvihill's April 1, 2022 comment could also be construed to include a Request for Reconsideration, it was received after the TCEQ ED's first preliminary decision but before the TCEQ ED's Final Decision, but cannot be granted because the generalized issues raised relating to health and welfare, land use and water have been fully considered and addressed, and/or are not relevant and material to an application for a minor NSR air permit. *See e.g.*, RTC Responses 5, 6, 10 and 18.

23. Joe J. Pacheco
201 Cowboy Trl
Liberty Hill, TX 78642-3954

Mr. Pacheco raises issues generally relating to air emissions and water contamination. Although the Hearing Request was timely received on October 12, 2022, it cannot be granted because the Hearing Requester is not an affected person because the only personal justiciable interest stated is based on purported property ownership, which based on the address provided is described in the mapping included in **Attachment "A"** as Map Parcel ID No 22, is several miles south of the Exflur Facility.

24. Chris Peyton
121 Night Bloom Path
Liberty Hill, TX 78642-2365

Chris Peyton raises issues generally relating to air emissions and water contamination. Although the Hearing Request was timely received on October 12, 2022, it cannot be granted because the Hearing Requester is not an affected person because the only personal justiciable interest stated is based on purported property ownership, which is admittedly 14 miles from the Exflur Facility, and based on the address provided is described in the mapping included in **Attachment "A"** as Map Parcel ID No 23.

**25. Renee Peyton
121 Night Bloom Path
Liberty Hill, TX 78642-2365**

Rene Peyton raises issues generally relating to air emissions and water contamination. Although the Hearing Request was timely received on October 12, 2022, it cannot be granted because the Hearing Requester is not an affected person because the only personal justiciable interest stated is based on purported property ownership, which is admittedly 14 miles from the Exflur Facility, and based on the address provided is described in the mapping included in **Attachment “A”** as Map Parcel ID No 24.

**26. Jennifer Spies
8907 Rustic Cv
Austin, TX 78717-4853**

Request for Reconsideration. Ms. Spies did not submit a Hearing Request. Although Ms. Spies’s Request for Reconsideration was timely received on June 21, 2022, it cannot be granted because the generalized issues raised including relating to pollution, water contamination, and chemicals were fully considered and addressed, and/or is not relevant and material to an application for a minor NSR air permit. *See e.g.*, RTC Responses 5, 10, 18, 20, 21, and 24.

**27. Sandra Lee Thurman
190 County Road 208
Florence, TX 76527-4472**

The only issue raised in Ms. Thurman’s Hearing Request relates to RTC Response 5 regarding the effect of the emissions on the air quality and health of people, and sensitive populations was determined by comparing the maximum modeled emissions to the state and federal air quality standards. Ms. Thurman’s address coincides with the mapping included in **Attachment “A”** as Map Parcel ID No 26 which is within one mile of the property where the Exflur Facility would be located, which is owned by Damon and Sandra Thurman according to the WCAD. However, no documentation has been provided to demonstrate property ownership. Further, Ms. Thurman’s only comment submitted on April 7, 2022 focused on the use of chemicals, land use, and water issues, but did not expressly state discernable concerns regarding air quality, and certainly not the same, specific concerns expressed in the Hearing Request relating to air quality. Thus, the Hearing Request cannot be granted.

Referrable Issues: If the Commission determines that Ms. Thurman’s comment supports her Hearing Request, the only issues that should be referred is as follows: (i) Whether the Draft Permit is protective of air quality, human health and welfare, and the environment, including for sensitive receptors, and (ii) Whether the air dispersion modeling and evaluation of the surrounding area was complied with applicable requirements.

Request for Reconsideration. To the extent Ms. Thurman’s April 7, 2022 comment could also be construed to include a Request for Reconsideration, it cannot be granted because the generalized issues raised relating to the use of chemicals, land use and water have been fully considered and addressed, and/or are not relevant and material to an application for a minor NSR air permit. *See e.g.*, RTC Responses 5, 10, 17, 21 and 25.

28. Brittany D. Varner
P.O. Box 1532
Liberty Hill, TX 78642-1532

Ms. Varner’s Hearing Request raises generalized issues relating to air emissions, water issues, health issues, and land use. Ms. Varner’s address coincides with the mapping included in **Attachment “A”** as Map Parcel ID No 27, which is within one mile of the property boundary where the Exflur Facility is located, which the WCAD indicates is owned by Hunter Wayne and Brittany Danielle Varner. However, since Ms. Varner’s only comment submitted on April 13, 2022 did not expressly state discernable concerns regarding air quality, and certainly not the same, specific concerns expressed in the Hearing Request relating to air quality. Further, TCEQ does not have jurisdiction in a minor NSR air application to address land use or water, as explained in RTC Response 10 and 18. Thus, the Hearing Request cannot be granted.

Referrable Issues: If the Commission determines that Ms. Varner is an affected person, and the Hearing Request is not too generalized, the only referrable issue is: Whether the Draft Permit is protective of air quality, human health and welfare, and the environment, including for sensitive receptors.

29. Harold Charles Wardlaw
19910 Park Rnch
San Antonio, TX 78259-1934

Mr. Wardlaw’s Hearing Request raises generalized issues relating air emissions, water issues, health issues, and land use. Mr. Wardlaw’s claimed property interest appears to be the same property interest claimed in the McCormick Ranch FLP, which is purportedly located 0.9 miles from Exflur’s proposed site. This appears to be the same property described in the NSGA as the property in which Margaret Peggy Anne McCormick Wardlaw has an interest, and appears to coincide with the mapping included in **Attachment “A”** as Map Parcel ID No 32. However, no supporting documentation has been provided to make a sufficient demonstration regarding an ownership interest in the property, which according to the WCAD is owned by the McCormick Children’s Family Limited Partnership.

Referrable Issues: If the Commission determines that Mr. Wardlaw has made a sufficient demonstration of property ownership, and the Hearing Request is not too generalized, the only referrable issue is: Whether the Draft Permit is protective of air quality, human health and welfare, and the environment, including for sensitive receptors.

Request for Reconsideration. To the extent Mr. Wardlaw's March 31, 2022 comment or his October 13, 2022 Hearing Request could also be construed to include a Request for Reconsideration, it cannot be granted because the generalized issues raised relating to the use of chemicals, land use and water have been fully considered and addressed, and/or are not relevant and material to an application for a minor NSR air permit. See e.g., RTC Responses 5, 10, 17, 21 and 25.

**30. Peggy Anne Wardlaw
19910 Park Ranch
San Antonio, TX 78259-1934**

Ms. Peggy Anne Wardlaw raises generalized air and water concerns, and questions whether the health effects evaluation was correctly conducted. The property interest claimed by Ms. Peggy Anne Wardlaw in the Hearing Request appears to be the same property interest claimed by Margaret Peggy Anne McCormick Wardlaw who is identified as a NSGA member as explained above. This property is described as Map Parcel ID No 32 in the mapping included in **Attachment "A"**, which according to the WCAD is owned by FLP. Another parcel of property which appears to coincide with the property described in the Hearing Request is described as Map Parcel ID No 28, 29 in the mapping included in **Attachment "A"**, which according to the WCAD is owned Margaret Wardlaw. It is not clear whether the Margaret Wardlaw described in the WCAD records is the same as the Margaret Peggy Anne McCormick Wardlaw identified as a NSGA member and/or is the same as the Peggy Anne Wardlaw described in this Hearing Request. No supporting documentation has been provided to make a sufficient demonstration regarding ownership of and/or interests in either parcel of property.

Referrable Issues: If the Commission determines that Ms. Wardlaw has made a sufficient demonstration of property ownership, and the Hearing Request is not too generalized, the only referrable issues are: (i) Whether the Draft Permit is protective of air quality, human health and welfare, and the environment, including for sensitive receptors, and (ii) Whether the state and federal health effects evaluations were properly conducted.

**31. Shannon White-Shubert and Mike Shubert
3404 Cortina Ln
Round Rock, TX 78681-2417**

Ms. White-Shubert's Hearing Request raises generalized issues relating to protection of human health, animal health and trees, land use, nuisance, and emergency response. Ms. White-Shubert address coincides with the mapping included in **Attachment "A"** as Map Parcel ID No 30, which is within one mile of the property boundaries where the Exflur Facility is located. TCEQ does not have jurisdiction in a minor NSR air application to address land use or emergency response, as explained in RTC Response 18 and 22.

Referrable Issues: If the Commission determines that Shannon White-Shubert and Mike Shubert are affected persons, and the Hearing Request is not too generalized, the only referrable issues are: (i) Whether the Draft Permit is protective of air quality, human health

and welfare, and the environment, including for sensitive receptors, and (ii) Whether the emissions limits in the Draft Permit will create a nuisance as defined by TCEQ's rules which will interfere with the normal use and enjoyment property.

Request for Reconsideration. Ms. White-Shubert's October 13, 2022 Request for Reconsideration cannot be granted because the issues raised are generalized issues relating to protection of human health, animal health and trees, land use, nuisance, and emergency response, which have been fully considered and addressed, and/or are not relevant and material to an application for a minor NSR air permit. *See e.g.*, RTC Responses 5, 10, 17, 18, 21, 22 and 25.

**32. Haziel McCormick Williams
19926 Park Holw
San Antonio, TX 78259-1924**

Haziel McCormick Williams raised general health issues and compliance history, land use, and water pollution issues. Haziel McCormick Williams who submitted a stand-alone Hearing Request on October 13, 2022 appears to be the same Haziel McCormick Williams that NSGA is claiming as a member, as described above in the evaluation of the NSGA Hearing Request. The property interests are purportedly 0.7 and 0.9 miles from the emissions points for the Exflur Facility, and appear to coincide with Map Parcel ID No 31 in the mapping included in **Attachment "A"**, which according to the WCAD are both owned by Haziel Roberta McCormick Williams. However, this Hearing Request cannot be granted because Haziel McCormick Williams' only written comment submitted on March 29, 2022 only raised an incident at Exflur's Round Rock site from 2014.

III. CONCLUSION AND PRAYER

Potential impacts of the air emissions from the Exflur Facility even within one mile from the Exflur Facilities are expected to be indiscernible based on the Fraiser Affidavit. Impacts further from the site would be even less discernible. Thus, denial of all Hearing Requests would be supported by science. However, past Commission precedent has granted Hearing Requests if there is a demonstrated property interest within one mile of the emissions points, and if all other requisites for a Hearing Request have been met. Based on the foregoing, Exflur respectfully requests that the that the Commission take the following actions:

1. If the Commission determines that the following have sufficiently demonstrated that they have a personal justiciable interest through their claimed property ownership interests, and/or have sufficiently submitted a Hearing Request with issues fairly and discernibly raised in a timely filed comment, then the Hearing Requests from the following could be granted:

NSGA
Elizabeth Ann Friou
Suzanne Johnson
Charles McCormick
Patricia McCormick Mulvihill
Sandra Lee Thurman
Brittany D. Varner
Harold Charles Wardlaw
Peggy Anne Wardlaw
Shannon White-Shubert and Mike Shubert

2. Deny the Hearing Requests from the following because they have not demonstrated that they have a personal justiciable interest, and/or have not submitted a Hearing Request with issues fairly and discernibly raised in a timely filed comment:

Nicole Elizabeth Bauer
Anne & Thomas Beville, Jr.
Terry G. Cook
Ms. Sheryl Marie Farley
Kelley Heath
Catherine Johnston
Erin McCormick
Joyce McCormick
Nickolas McCormick
Henry N. Mulvihill Jr.
Joe J. Pacheco
Chris Peyton
Renee Peyton
Hazel McCormick Williams

3. Deny all Requests for Reconsideration, including from the following:

NSGA
Nicole Elizabeth Bauer
Ms. Sheryl Marie Farley
Jillian Gabriel
Richard Grabish
Alycen Malone
Timothy McDaniel
Karen Milone
Henry N. Mulvihill Jr.
Patricia McCormick Mulvihill
Jennifer Spies
Sandra Lee Thurman
Brittany D. Varner

Harold Charles Wardlaw
Shannon White-Shubert and Mike Shubert

4. If one or more of the Hearing Requests submitted by one or more of the Hearing Requesters identified by the issue below is granted a hearing, refer the issue to a contested case hearing:
 - a. Whether the Draft Permit is protective of air quality, human health and welfare, and the environment. (NSGA) (Elizabeth Friou) (Suzanne Johnson) (Patricia McCormick Mulvihill) (Sandra Lee Thurman) (Brittany D. Varner) (Harold Charles Wardlaw) (Peggy Anne Wardlaw) (Shannon White-Shubert and Mike Shubert)
 - b. Whether the Draft Permit complies with federal and state air quality standards relating to protecting animal life, vegetation, and property. (NSGA) (Elizabeth Friou)
 - c. Whether the air dispersion modeling and evaluation of the surrounding area complies with applicable requirements. (NSGA) (Sandra Lee Thurman)
 - d. Whether emissions were calculated in accordance with the appropriate methodologies. (NSGA)
 - e. Whether the BACT analysis was conducted in accordance with applicable TCEQ practices and standards and if the Draft Permit includes BACT. (NSGA)
 - f. Whether the allowance of chemical flexibility in the Draft Permit is appropriate based on any applicable TCEQ standards. (NSGA)
 - g. Whether emission rates are dependent on a limit on operational hours or there are issues associated with the air quality analysis that require a limitation on the hours of operation. (NSGA)
 - h. Whether the Draft Permit's monitoring and recordkeeping requirements are adequate to ensure compliance can be demonstrated with the emission limitations set forth in the Draft Permit. (NSGA) (Elizabeth Friou)
 - i. Whether the applicant's compliance history supports issuance of the Draft Permit in accordance with TCEQ's compliance history rules. (NSGA)
 - j. Whether the Draft Permit appropriately requires the permit holder to comply with EPA regulations on Chemical Accident Prevention, including a Risk Management Plan. (NSGA)
 - k. Whether the emissions limits in the Draft Permit will create a nuisance as defined by TCEQ's rules, which will interfere with the normal use and enjoyment of property. (Elizabeth Friou) (Shannon White-Shubert and Mike Shubert)

- l. Whether an exhaust monitoring system that measures and records emissions in real time with alarms to alert emergency services be installed? (Charles McCormick)
 - m. Whether the state and federal health effects evaluations were properly conducted. (Peggy Anne Wardlaw)
5. Limit the duration of any hearing to a maximum of 180 days, if a contested case hearing is granted.

Respectfully Submitted,




Derek L. Seal
State Bar No. 00797404
McGinnis Lochridge
1111 West 6th Street, Suite 400
Austin, Texas 78701
512-495-6175
dseal@mcginnislaw.com

COUNSEL FOR
EXFLUOR RESEARCH CORPORATION

CERTIFICATE OF SERVICE

I hereby certify that on November 21, 2022, the foregoing Exflur Research Corporation's Response to Hearing Requests and Requests for Reconsideration was e-filed with the Chief Clerk of the Texas Commission on Environmental Quality and, in compliance with 30 Tex. Admin. Code § 1.11 and 30 Tex. Admin. Code 55.209(d), a copy was served to the Executive Director, the director of the Office of Public Assistance, the director of the TCEQ Office of External Relations, the TCEQ Office of Public Interest Counsel and all persons who filed hearing requests and provided addresses.

By: 

Derek Seal

**MAILING LIST
EXFLUOR RESEARCH CORPORATION
DOCKET NO. 2022-1552-AIR; PERMIT NO. 165848**

FOR THE EXECUTIVE DIRECTOR

via electronic mail:

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REQUESTER(S):

See attached list.

REQUESTER(S)

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Anne & Thomas Beville
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Terry G Cook
Commissioner, Williamson County Precinct 1
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Ste 110
Round Rock, TX 78664-1905

Ms Sheryl Marie Farley
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Kelley Heath
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Leander, TX 78641-2595

Lauren Ice
Perales Allmon & Ice Pc
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Johnson Woods
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Charles McCormick
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Erin McCormick
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San Antonio, TX 78259-1924

Erin McCormick
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Joyce McCormick
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Nickolas McCormick
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Timothy McDaniel
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Patricia McCormick Mulvihill
North San Gabriel Alliance
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Richardson, TX 75080-2343

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Chris Peyton
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Hill, TX 78642-2365

Renee Peyton
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Liberty Hill, TX 78642-2365

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Haziel McCormick Williams
19926 Park Holw
San Antonio, TX 78259-1924

Attachment A
Windolph Affidavit

**TCEQ DOCKET NO. 2022-1552-AIR
AFFIDAVIT OF JOERG WINDOLPH, P.E.
WAID ENVIORNMENTAL**

STATE OF TEXAS
COUNTY OF TRAVIS

§
§

BEFORE ME, the undersigned notary public, on this day personally appeared Joerg Windolph, P.E. Principal Engineer, Waid Environmental, who is known to me to be the person whose name is subscribed below, and who after being duly sworn by me, did upon his oath, state as follows:

1. My name is Joerg Windolph. I am over 21 years of age, am of sound mind, and am fully competent to make this affidavit. Each and every statement contained in this affidavit is based upon my personal knowledge, and each and every statement is true and correct.
2. I am a Principal Engineer at Waid Corporation, dba Waid Environmental (“*Waid*”), which is an engineering and environmental services firm founded in 1978. My specialized experience has over my career included preparing or directing or overseeing the preparation of hundreds of applications for air new source review (“*NSR*”) permits required by both the federal and Texas Clean Air Acts, including case-by-case permits, standard permits, and permits by rule, for all types of industry across Texas, and working with Texas Commission on Environmental Quality (“*TCEQ*”) staff regarding their processing of those applications.
3. Under my supervision and direction, Waid prepared the “*Application*” for proposed Permit No. 165848 (“*Permit*”) submitted to TCEQ by Exfluor Research Corporation (“*Exfluor*”) which would authorize emissions from a new specialty chemical manufacturing facility in Williamson County, Texas (“*Exfluor Facility*”). As part of the Application, Waid conducted an Air Quality Modeling Analysis (“*Modeling*”).
4. I was awarded a degree of Bachelor of Science in Chemical Engineering from the University of Texas in Austin on December 21, 1991. I hold Professional Engineering License No. 85360 from the Texas Board of Professional Engineers and Surveyors (“*Board*”), which I have held since July 23, 1999. I have passed the Board’s National Council of Examiners for Engineering and Surveying examination for the Chemical Branch, which shows I have competency as professional engineer to conduct work relating to chemicals. I have over 30 years of experience in the environmental field, including in performing air permitting work for various industries in Texas, primarily synthetic organic chemical manufacturing, petroleum refining facilities, gas processing plants, bulk petrochemical storage terminals, and printing facilities. That experience includes me conducting or overseeing complex air dispersion modeling analyses in support of those applications, as well as auditing air dispersion modeling analyses conducted by others. I have extensive experience with and knowledge of various air dispersion models (e.g., SCREEN3, ISCST3, ISC-PRIME and AERMOD), and extensive experience conducting air dispersion

modeling using those models and preparing summaries of the results of such modeling. These are the models which are accepted by TCEQ in the air permitting process.

5. I have been with Waid since 1992. Texas and the Southwest are our principal geographical work areas, although we have worked in many other states. We specialize in air quality services, particularly emissions control, permits, and compliance and have conducted over 3,500 air quality projects in the last 5 years. Preparation of air permit applications for submission to agencies such as TCEQ is done by staff members who are knowledgeable of the requirements of both state and federal agencies. Waid offers complete support in all areas of the permitting process, including performing atmospheric dispersion modeling studies. Our modeling environment enables us to perform virtually all regulatory modeling.

6. Steven DeNero, Waid's Senior Air Dispersion Modeler who has extensive experience in conducting air dispersion modeling conducted the Modeling for the Exflur Facility under my direction and supervision. The Modeling calculated the predicted ground level concentrations ("GLCs") at offsite locations and the maximum off-site¹ GLC ("GLC_{max}") of each regulated pollutant that will be emitted from the Exflur Facility for each relevant averaging period if the Application is approved. The Modeling is summarized in TCEQ's Air Quality Analysis Audit dated November 18, 2021 ("*Modeling Audit*"), attached hereto as part of *JW-EX. 1*. The Modeling was conducted in accordance with standard and accepted modeling protocols, and was accepted by TCEQ, as explained in the Modeling Audit.

7. Waid conducted as part of the Modeling a minor National Ambient Air Quality Standard ("*NAAQS*") evaluation for each pollutant to which the NAAQS applies ("*Criteria Pollutants*"), which is only for Carbon Monoxide ("*CO*"), Nitrogen Dioxide ("*NO₂*"), Particulate Matter with particles that are 10 microns or less in diameter ("*PM₁₀*") and Particulate Matter with particles that are 2.5 microns or less in diameter ("*PM_{2.5}*"). As indicated in Table 1 of the Modeling Audit, the GLC_{max} for all of the NAAQS pollutants were below the established Significant Impact Levels ("*SILs*", "*De Minimis*"), so no further analysis was required or needed.

8. The major NSR program contained in parts C and D of Title I of the Federal Clean Air Act is a preconstruction review and permitting program applicable to new major sources and major modifications at such sources. If a pollutant will be emitted at rates below what the U.S. Environmental Protection Agency ("*EPA*") considered to be significant emission rates, the pollutant is not subject to review under EPA's "*major NSR*" permitting programs; however, the state's "*minor NSR*" permitting program still applies. The minor NSR program is applicable when a source does not trigger major NSR or emits an air contaminant not subject to major NSR review. A minor NAAQS modeling evaluation accompanies a minor NSR permit application. The Exflur Facility is not subject to major NSR review, so a minor NAAQS evaluation is appropriate for the review of this facility's proposed criteria pollutant emissions.

¹ "Off-site" means all area beyond the boundaries of the property on which the Exflur Facility is proposed to be located pursuant to the Application.

9. Waid also performed a State Health Effects Evaluation, and as indicated in Table 2 of the Modeling Audit, the GLC_{max} for all constituents modeled except for fluorine (1-hr Averaging Time), were far below the Effects Screening Level (“*ESL*”) set by TCEQ. For all constituents with modeled concentrations below the *ESLs*, no further analysis was required or needed. The GLC_{max} for fluorine (1-hr Averaging Time) was slightly above the *ESL* and therefore required additional pollutant-specific modeling. This involved a less conservative modeling approach of representing the proposed emission rate from each source at the facility and modeling those sources simultaneously in order to determine the actual location and time of the GLC_{max} . The *ESL*-exceeding concentrations for fluorine were similarly to within 75 meters adjacent to the plant property line. As indicated by Table 3 of the Modeling Audit, the concentrations of fluorine were predicted to exceed the *ESL* up to 99 hours out of a year of 8,760 hours at the location of the GLC_{max} . This fluorine maximum occurs along the western property boundary of the plant. These predicted *ESL*-exceeding concentrations assume that all facilities will be operating for the full year at 100% capacity.

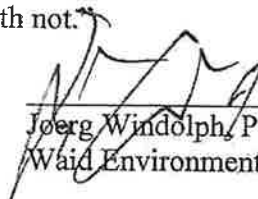
10. In a post-submittal review of the State Health Effects Evaluation, an error was corrected in the modeling analysis for hydrogen fluoride (specifically hydrogen fluoride for air permit review in agricultural areas). The initially submitted analysis was based on the 1-hr Averaging Time. However, the *ESL* threshold of $3.0 \mu\text{g}/\text{m}^3$, per the TCEQ’s Development Support Document (“*DSD*”), is based on a 24-hour average concentration. Accurate comparison to the *ESL* would require 24-hour average based modeling output. This specification can be found in Table 1 of the *DSD* titled “Health- and Welfare-Based Values”. The modeling output files initially submitted for this analysis included 24-hour average values. In updating the analysis to be based on 24-hour impact values instead of the 1-hour impact values yields a hydrogen fluoride GLC_{max} concentration below the *ESL*. Therefore, no concentrations of hydrogen fluoride are expected to exceed the *ESL* at any locations off-property due to emissions from the Exflur Facility.

11. Since no sulfur compounds would be authorized from the Exflur Facility, no State Property Line Standard analysis was required as part of the Application process.

12. I am familiar with the November 9, 2022 letter from the TCEQ Chief Clerk regarding consideration of the hearing requests on the Application by the TCEQ Commissioners on December 14, 2022, which includes a mailing list of persons who submitted a contested case hearing on the Application (“*Hearing Requesters*”). At my direction Waid prepared the mapping attached hereto *as JW-EX. 2* which shows the location of the Exflur Facility in relation to the property interests described by each Hearing Requester (“*Hearing Requester Locations*”). I have over 30 years of experience preparing similar mapping in connection with TCEQ air permit applications. ArcGIS was used by me or under my direct supervision and oversight to identify the location of the facilities associated with the Exflur Facility which would be authorized by the Permit, based on the GPS coordinates represented in the Application, and the location of the interest claimed by each Hearing Requester. The mapping that was prepared was supplemented by information located in the property ownership records electronically available from the Williamson County Appraisal District (“*CAD*”), and confirmed by visual evidence on various aerial mapping tools to identify property parcels. For all of the mapping work that I did not personally conduct, I verified that such work was conducted properly.

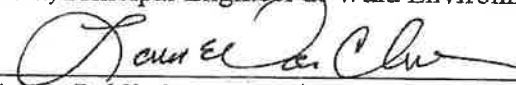
13. The facilities are located within the property footprint at a minimum of 365 feet from the property boundary. The emitting facilities are more than 750 feet from the nearest Hearing Requestor property boundary. Based on atmospheric dispersion modeling following TCEQ and EPA protocols, no air contaminant concentrations were predicted which would be authorized by the Permit that would exceed any state or federal standards or ESL at the Hearing Requester Locations.

Further affiant sayeth not.

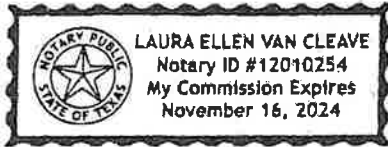


Joerg Windolph, P.E.
Waid Environmental

This instrument was acknowledged before me, the undersigned authority, this 21st day of November, 2022, by Joerg Windolph, P.E., Principal Engineer at Waid Environmental, on behalf of said company.



Notary Public in and for the State of Texas



JW-EX.-1
Modeling Audit

TCEQ Interoffice Memorandum

To: Cara Hill
Mechanical/Coatings Section

Thru: Chad Dumas, Team Leader
Air Dispersion Modeling Team (ADMT)

From: Ahmed Omar, P.E.
ADMT

Date: November 18, 2021

Subject: **Air Quality Analysis Audit – Exflur Research Corporation (RN110969227)**

1. Project Identification Information

Permit Application Number: 165848
NSR Project Number: 331049
ADMT Project Number: 7632
County: Williamson
Published Map: <\\tceq4avmgisdata\GISWRK\APD\MODEL PROJECTS\7632\7632.pdf>

Air Quality Analysis: Submitted by Waid Environmental, October 2021, on behalf of Exflur Research Corporation. Additional information was provided November 2021.

2. Report Summary

The air quality analysis is acceptable for all review types and pollutants. The results are summarized below.

A. Minor Source NSR and Air Toxics Analysis

Table 1. Modeling Results for Minor NSR De Minimis

Pollutant	Averaging Time	GLCmax ($\mu\text{g}/\text{m}^3$)	De Minimis ($\mu\text{g}/\text{m}^3$)
PM ₁₀	24-hr	0.1	5
PM _{2.5}	24-hr	0.1	1.2
PM _{2.5}	Annual	0.01	0.2
NO ₂	1-hr	7	7.5
NO ₂	Annual	0.1	1
CO	1-hr	10	2000
CO	8-hr	3	500

The GLCmax are the maximum predicted concentrations associated with one year of meteorological data.

TCEQ Interoffice Memorandum

Generic modeling was used for the above analyses; refer to section 3 for more details on the generic modeling.

The justification for selecting the EPA's interim 1-hr NO₂ De Minimis level was based on the assumptions underlying EPA's development of the 1-hr NO₂ De Minimis level. As explained in EPA guidance memoranda¹, the EPA believes it is reasonable as an interim approach to use a De Minimis level that represents 4% of the 1-hr NO₂ NAAQS.

The PM_{2.5} De Minimis levels are the EPA recommended De Minimis levels. The use of the EPA recommended De Minimis levels is sufficient to conclude that a proposed source will not cause or contribute to a violation of a PM_{2.5} NAAQS based on the analyses documented in EPA guidance and policy memorandums².

To evaluate secondary PM_{2.5} impacts, the applicant provided an analysis based on a Tier 1 demonstration approach consistent with the EPA's Guideline on Air Quality Models. Specifically, the applicant used a Tier 1 demonstration tool developed by the EPA referred to as Modeled Emission Rates for Precursors (MERPs). The basic idea behind the MERPs is to use technically credible air quality modeling to relate precursor emissions and peak secondary pollutants impacts from a source. Using data associated with the worst-case source, the applicant estimated 24-hr and annual secondary PM_{2.5} concentrations of 0.0001 µg/m³ and <0.0001 µg/m³, respectively. When these estimates are added to the GLCmax listed in the table above, the results are less than the De Minimis levels.

¹ www.tceq.texas.gov/assets/public/permitting/air/memos/guidance_1hr_no2naaqs.pdf

² www.tceq.texas.gov/permitting/air/modeling/epa-mod-guidance.html

TCEQ Interoffice Memorandum

Table 2. Minor NSR Site-wide Modeling Results for Health Effects

Pollutant	CAS#	Averaging Time	GLCmax (µg/m³)	GLCmax Location	GLCni (µg/m³)	GLCni Location	ESL (µg/m³)
hydrogen fluoride	7664-39-3	1-hr	6	-	<6	-	18
hydrogen fluoride For air permit reviews in agricultural areas	7664-39-3	1-hr	3.9	Eastern Property Line	-	-	3
hydrogen fluoride For air permit reviews in agricultural areas with cattle	7664-39-3	Annual	0.3	-	-	-	0.75
fluorine	7782-41-4	1-hr	3.9	Western Property Line	3.9	Western Property Line	2
perfluoroheptane	335-57-9	1-hr	22	-	<22	-	20000
methanol	67-56-1	1-hr	38	-	<38	-	3900
perfluorooctanoic acid and its inorganic salts	335-67-1	1-hr	<0.01	-	<0.01	-	0.05
bromine	7726-95-6	1-hr	5	-	<5	-	7
hydrogen chloride	7647-01-0	1-hr	4	-	<4	-	190
hydrogen chloride	7647-01-0	Annual	0.1	-	<0.1	-	7.9
carbon tetrafluoride	75-73-0	1-hr	154	-	<154	-	18000
Perfluoro (bis-2-chloroethoxy methane)	Not found	1-hr	7	-	<7	-	200
Perfluorodecalin	306-94-5	1-hr	22	-	<22	-	200
polymers of chlorotrifluoroethylene (PCTFE)	9002-83-9	1-hr	17	-	<17	-	50

TCEQ Interoffice Memorandum

Pollutant	CAS#	Averaging Time	GLCmax (µg/m³)	GLCmax Location	GLCni (µg/m³)	GLCni Location	ESL (µg/m³)
carbonyl fluoride For air permit reviews in agricultural areas with cattle	353-50-4	Annual	0.03	-	<0.03	-	0.71
trifluoroacetic acid For air permit reviews in agricultural areas with cattle	76-05-1	Annual	0.03	-	<0.03	-	0.71

Table 3. Minor NSR Hours of Exceedance for Health Effects

Pollutant	Averaging Time	1 X ESL GLCni
fluorine	1-hr	99

For fluorine, the GLCmax and the GLCni are the same. Pollutant-specific modeling was conducted for fluorine and 1-hr hydrogen fluoride at agricultural areas. For all other pollutants and averaging times, generic modeling was used; refer to section 3 for more details on the generic modeling.

TCEQ Interoffice Memorandum

3. Model Used and Modeling Techniques

AERMOD (Version 21112) was used in a refined screening mode.

A unitized emission rate of 1 lb/hr was used to predict a generic short-term and long-term impact for each source. The generic impact was multiplied by the proposed pollutant specific emission rates to calculate a maximum predicted concentration for each source. The maximum predicted concentration for each source was summed to get a total predicted concentration for each pollutant. Pollutant-specific modeling was conducted for fluorine and 1-hr hydrogen fluoride at agricultural areas.

A. Land Use

Medium roughness and elevated terrain were used in the modeling analysis. These selections are consistent with the AERSURFACE analysis, topographic map, DEMs, and aerial photography. The selection of medium roughness is reasonable.

B. Meteorological Data

Surface Station and ID: Austin, TX (Station #: 13904)
Upper Air Station and ID: Fort Worth, TX (Station #: 3990)
Meteorological Dataset: 2016
Profile Base Elevation: 150.9 meters

C. Receptor Grid

The grid modeled was sufficient in density and spatial coverage to capture representative maximum ground-level concentrations.

D. Building Wake Effects (Downwash)

Input data to Building Profile Input Program Prime (Version 04274) are consistent with the aerial photography, plot plan, and modeling report.

4. Modeling Emissions Inventory

The modeled emission point and volume source parameters and rates were consistent with the modeling report. The source characterizations used to represent the sources were appropriate.

The applicant assumed full conversion of NO_x to NO₂, which is conservative.

Maximum allowable hourly emission rates were used for the short-term averaging time analyses, and annual average emission rates were used for the annual averaging time analyses.

JW-EX.-2
Hearing Requester Locations

Hearing Requester Home and Land Addresses

Williamson County Appraisal District (WCAD) parcel IDs obtained for all Florence, TX land addresses.

Map Parcel ID	Home Address	Home City	Land Address	Land City	Map Reference	WCAD Parcel ID	WCAD Land Owner	Last Name	First/Middle
1	800 Hidden Bear Rd	Liberty Hill	800 Hidden Bear Rd	Liberty Hill	1	-	-	Bauer	Nicole Elizabeth
2	443 CR 278	Liberty Hill	443 CR 278	Liberty Hill	1	-	-	Beville	Anne & Thomas
3	1801 E Old Settlers Blvd	Round Rock	3116 GoldenOak Cir	Round Rock	1	-	-	Cook	Terry G
4	6600 CR 200	Liberty Hill	6600 CR 200	Liberty Hill	1	-	-	Farley	Sheryl Marie
5	5203 Ridge Oak Dr	Austin	2100 CR 209	Florence	1 & 2	R381158 R010200	Ann Wheelock Friou Indiv & As Tr of the Thomas Claborne Friou Family Trust	Friou	Elizabeth Ann
6	105 Lark St	Leander	105 Lark St	Leander	1	-	-	Gabriel	Jillian
7	201 Shady Oaks Trl	Liberty Hill	201 Shady Oaks Trl	Liberty Hill	1	-	-	Grabish	Richard
8	205 Talon Grasp Trl	Leander	205 Talon Grasp Trl	Leander	1	-	-	Heath	Kelley
9	1400 CR 236	Florence	1400 CR 236	Florence	1 & 2	R591137	Suzanne M Johnson	Johnson	Suzanne
10	4960 Highway 138	Florence	4960 Highway 138	Florence	1 & 2	R360767	Catherine Therese & Richard Ryan Johnston	Johnston	Catherine
11	158 Barn Owl Loop	Leander	158 Barn Owl Loop	Leander	1	-	-	Malone	Alycen
12	440 W Pleasantview Dr	Hurst	CR 208	Florence	1 & 2	R599743	Charles Ely McCormick	McCormick	Charles Ely
13	2035 Woodglen Dr	Round Rock	CR 208	Florence	1 & 2	R468144	Charles Oneal McCormick	McCormick	Charles
14	19926 Park Holw	San Antonio	CR 208	Florence	1 & 2	R599742	Erin Marie McCormick	McCormick	Erin
15	1250 CR 208	Florence	1250 CR 208	Florence	1 & 2	R517815, R355941	McCormick, Bryce Philip JR / McCormick, Bryce Philip JR & Carolyn	McCormick	Erin
16	2301 Ohlen Rd	Austin	CR 208	Florence	1 & 2	R600116	Joyce Kelly McCormick	McCormick	Joyce
17	1050 CR 208	Florence	1050 CR 208	Florence	1 & 2	R549402	Nicholas James McCormick	McCormick	Nickolas
18	1800 CR 208	Florence	1800 CR 208	Florence	1 & 2	R007465	Timothy Wayne McDaniel	McDaniel	Timothy
19	208 N Haven Dr	Liberty Hill	208 N Haven Dr	Liberty Hill	1	-	-	Milone	Karen
20	PO Box 831945	Richardson	1050 CR 208	Florence	1 & 2	R468145	Henry N Jr & Patricia McCormick Tr. of Mulvihill Childrens Tr.	Mulvihill	Henry N
21	8 Lundys Ln	Richardson	1050 CR 208	Florence	1 & 2	R355959	Henry N Jr & Patricia McCormick Tr. of Mulvihill Childrens Tr.	Mulvihill	Patricia McCormick
22	201 Cowboy Trl	Liberty Hill	201 Cowboy Trl	Liberty Hill	1	R332591	Joe J II & Heather L Pacheco	Pacheco	Joe J
23	121 Night Bloom Path	Liberty Hill	121 Night Bloom Path	Liberty Hill	1	R605075	Renee Deyette & Christopher Scott Peyton	Peyton	Chris
24	121 Night Bloom Path	Liberty Hill	121 Night Bloom Path	Liberty Hill	1	R605075	Renee Deyette & Christopher Scott Peyton	Peyton	Renee
25	8907 Rustic Cv	Austin	8907 Rustic Cv	Austin	1	-	-	Spies	Jennifer
26	190 CR 208	Florence	190 CR 208	Florence	1 & 2	R419736	Damon & Sandra Thurman	Thurman	Sandra Lee
27	PO Box 1532	Liberty Hill	870 CR 236	Florence	1 & 2	R597597	Hunter Wayne & Brittany Danielle Varner	Varner	Brittany D
28	19910 Park Ranch	San Antonio	CR 208	Florence	1 & 2	R549407	Margaret Wardlaw	Wardlaw	Harold Charles

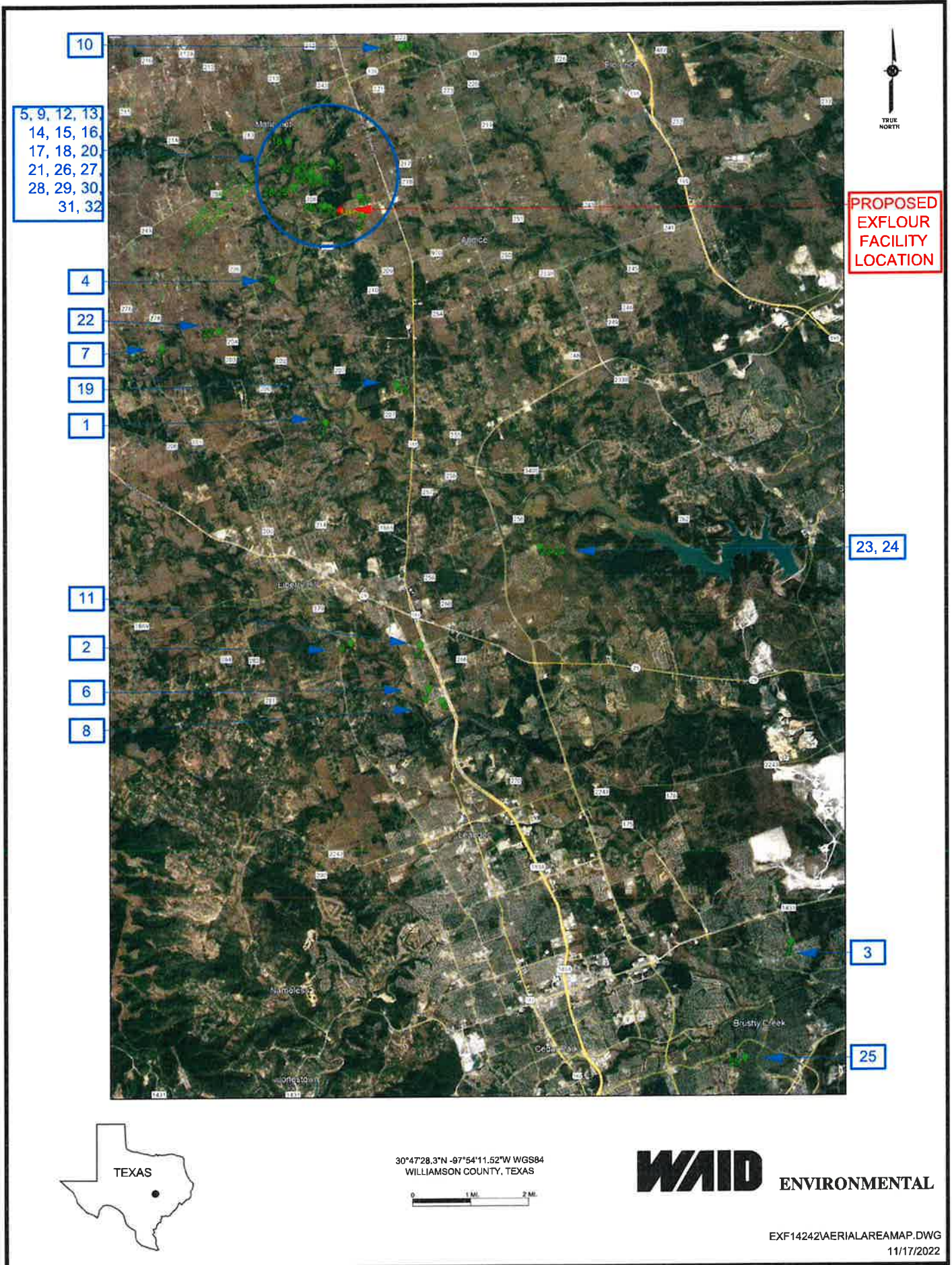
Hearing Requester Home and Land Addresses

Williamson County Appraisal District (WCAD) parcel IDs obtained for all Florence, TX land addresses.

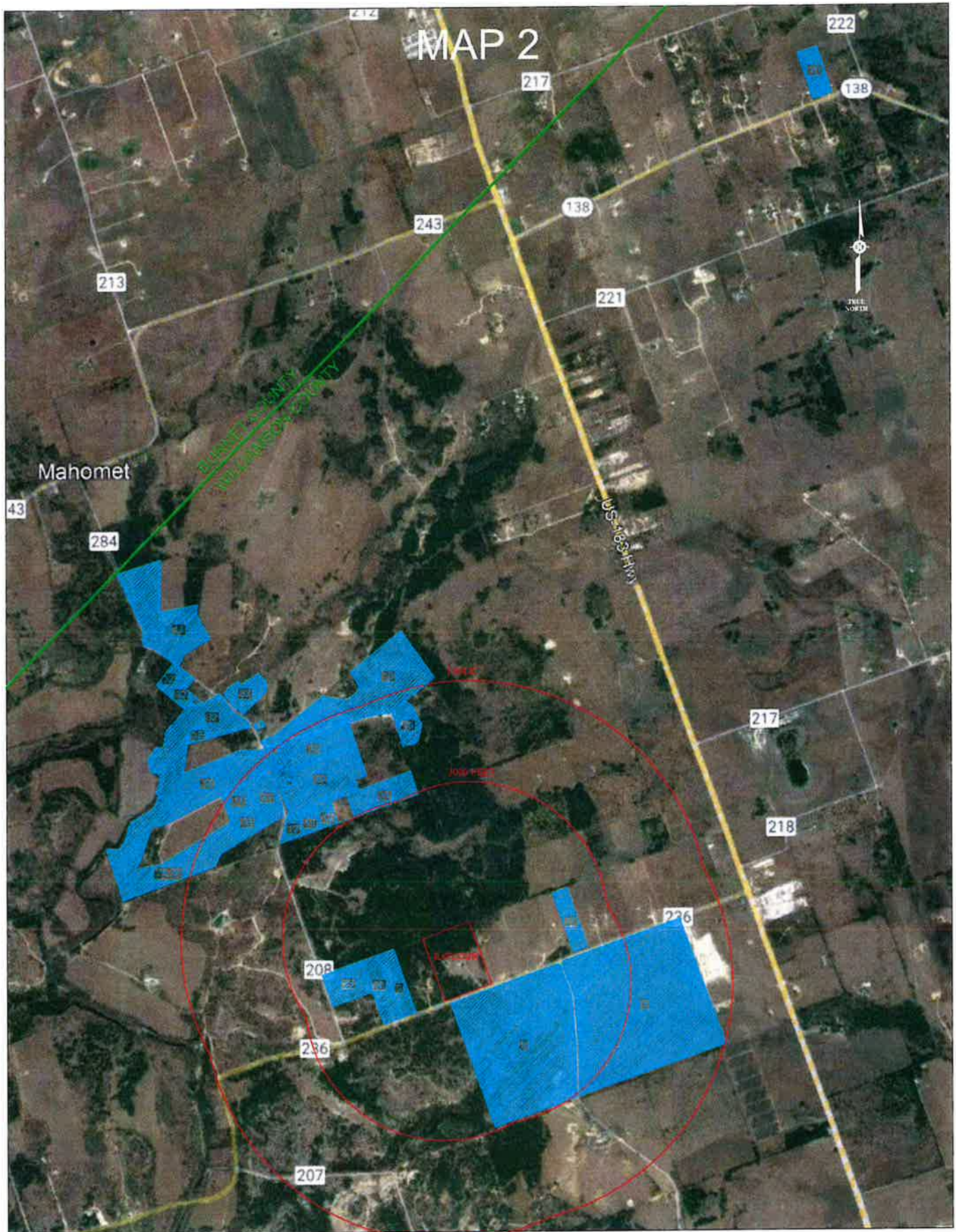
Map Parcel ID	Home Address	Home City	Land Address	Land City	Map Reference	WCAD Parcel ID	WCAD Land Owner	Last Name	First/Middle
29	19910 Park Ranch	San Antonio	1050 CR 208	Florence	1 & 2	R549407	Margaret Wardlaw	Wardlaw	Peggy Anne
30	3404 Corina Ln	Round Rock	1500 CR 236	Florence	1 & 2	R590413	Michael A & Shannon White Shubert	White-Shubert	Shannon
31	19926 Park Holw	San Antonio	CR 208	Florence	1 & 2	R468143, R549397	Haziel Roberta McCormick Williams	Williams	Haziel McCormick
32	-	-	1050 CR 208	Florence	1 & 2	R324265, R355958, R499716, R007468, R468146, R481203, R549417, R549422, R007458, R007459, R007473, R324266, R355927, R355965	McCormick Childrens Family Limited Partnership	-	-

Lands owned by the **McCormick Childrens Family LP** (Map ID 32) are included in this list due to their inclusion via "Margaret Peggy Anne McCormick Wardlaw" in the October 13, 2022 letter from Ms. Lauren Ice

MAP 1



MAP 2



Mahomet

US Highway 138

30°47'28.3"N -97°54'11.52"W WGS84
WILLIAMSON COUNTY, TEXAS



WAID ENVIRONMENTAL

EXF14242IPROPAERIALMAP.DWG
11/17/2022
Responsible

Attachment B
Frasier Affidavit

**TCEQ DOCKET NO. 2022-1552-AIR
AFFIDAVIT OF LUCY FRAISER, PH.D., DABT
FRAISER TOXICOLOGY CONSULTING, LLC**

STATE OF ARKANSAS
COUNTY OF WASHINGTON

§
§

BEFORE ME, the undersigned authority, on this day personally appeared Lucy Fraiser, who after being duly sworn upon her oath stated as follows:

1. My name is Lucy Fraiser. I am over 21 years of age, am of sound mind, and am fully competent to make this affidavit. Each and every statement contained in this affidavit is based upon my personal knowledge, and each and every statement is true and correct.
2. I am a toxicologist. I perform air quality health and welfare evaluations, provide litigation and regulatory support, and prepare soil/water human health and ecological risk assessments. I formed Lucy Fraiser Toxicology Consulting LLC in July 2017, which is a toxicology consulting firm.
3. I have been retained on behalf of Exflur Research Corporation ("**Exflur**") to conduct a public health and welfare effects evaluation related to the potential for health and/or welfare effects from maximum allowable emissions which would be authorized by Proposed Texas Commission on Environmental Quality ("**TCEQ**") Air Quality Permit Number 165848 ("**Permit**"). The Permit was developed by TCEQ staff based on the "**Application**" submitted to TCEQ to authorize Exflur's operations of a proposed chemical manufacturing facility in Williamson County, Texas.
4. The Documents available in the TCEQ Commissioners' Integrated Database relating to the application, including the November 9, 2022 letter from the TCEQ Chief Clerk regarding consideration of the hearing requests on the Application, which includes a mailing list of persons who submitted a contested case hearing on the Application ("**Hearing Requesters**"), have been made available to me for review. In addition, I have reviewed the following documents, as well as data regarding the Application provided to me by representatives of Exflur, or Waid Environmental ("**Waid**"), which prepared the air dispersion modeling for the Application:

TCEQ's Air Quality Analysis Audit for the Application, dated November 18, 2021 ("**Modeling Audit**");

TCEQ's Development Support Document for Hydrogen Fluoride and Other Soluble Inorganic Fluorides, dated September 14, 2015 ("**DSD**");

Affidavit of Joerg Windolph, Principal Engineer at Waid, in the same TCEQ Docket Number listed above for the Application ("**Windolph Affidavit**");

AFFIDAVIT OF LUCY FRAISER
FRAISER TOXICOLOGY CONSULTANTS, LLC
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TCEQ's *Modeling and Effects Applicability Review: How to Determine the Scope of Modeling and Effects Review for Air Permits* (APDG 5874) (2018) ("**MERA**");

TCEQ's *Guidelines to Develop Toxicity Factors* (RG-442) (September 2015);

TCEQ Effects Screening Levels ("**ESLs**") from the Texas Air Monitoring Information System (TAMIS) database for Hydrogen Fluoride, Hydrogen Fluoride (Agriculture), Hydrogen Fluoride (Agriculture with Cattle); Fluorine (used as a surrogate for Difluorine); Carbonyl Fluoride, Carbonyl Fluoride (Agriculture), Carbonyl Fluoride (Agriculture with Cattle); Trifluoroacetic acid, Trifluoroacetic acid (Agriculture), Trifluoroacetic acid (Agriculture with Cattle), Perfluorohexane, Perfluoroheptane, Methanol, Isopropyl Alcohol, Perfluorooctanoic acid, Bromine, Toluene, Butylated Hydroxytoluene, Acrylic Acid, Hydrogen Chloride, Ethyl acetate, 1,1,2-Trichloro-1,2,2-trifluoroethane, Perfluoropropane, Carbon tetrafluoride, Tetrahydrofuran, and Hydrogen Bromide; and

Additional ESLs in **Exhibit 1**, which were provided to Waid by Mr. Manny Reyna of the TCEQ Toxicology Division in response to a request from Mr. Christopher L. Bauer, a Principal Engineer at Waid, on October 30, 2008.

These are the same type of documents that any toxicologist would be expected to review and rely upon in conducting a public health and welfare effects evaluation.

5. I received a Ph.D. in Toxicology in 1992 from the University of Texas at Austin and a B.A. Degree in Psychology from the University of Texas at Austin in 1984. I am a Diplomate of the American Board of Toxicology ("**DABT**"). The DABT certification is a globally-recognized credential in toxicology. The DABT certification is a certification by the American Board of Toxicology ("**ABT**"), which is the largest professional toxicology credentialing organization in the world. The DABT certification represents competency and commitment to human health and environmental sciences. Becoming certified by the ABT requires a combination of higher education and experience, with rigorous certification (testing) and recertification processes. I am also a member of the American College of Toxicology. I have conducted and managed hundreds of multi-pathway exposure and human health risk assessments and risk-based corrective action evaluations over my 32-year career. Early in my career, I worked in the Toxicology Division of the Texas Natural Resource Conservation Commission ("**TNRCC**"), the predecessor agency to the TCEQ. After leaving the TNRCC in 1998, I worked for a number of different consulting firms as a toxicologist. I started Lucy Fraiser Toxicology Consulting LLC in July 2017. While I work with all environmental media, I specialize in air quality public health and welfare effects evaluations. I have performed these evaluations for many industrial source types and types of pollutants. I have extensive experience performing public health and welfare effects evaluations related to air quality permit applications submitted to the TCEQ and its predecessor agency, the TNRCC. I have conducted health and welfare evaluations for proposed and/or existing emissions from dozens of industrial facilities, including hazardous waste combustion facilities, refineries, electricity generating units, chemical plants, concrete batch plants, rock crushers, cement kilns, and smelters (copper and lead). I have also performed numerous other air quality evaluations in other states not directly related to the air permitting process. I have been qualified as an expert, been deposed, and

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have provided expert testimony in contested case hearings, federal civil suits, and state toxic tort litigation involving potential effects of air emissions on public health and welfare on numerous occasions.

6. Applicants for TCEQ air permit applications use air dispersion modeling to predict concentrations of the pollutants from the proposed facilities at “receptors,” which TCEQ modeling guidance defines as locations “where the public could be exposed to an air contaminant in the ambient air.” Air dispersion models predict movement of contaminants in the atmosphere and provide conservative estimates (i.e., overestimates) of air pollutant concentrations at different distances and directions from the emissions source. Exposure occurs when local populations come into contact with pollutants from an emissions release. Therefore, conservatively estimated air concentrations from air dispersion modeling are routinely used to evaluate potential exposures by providing conservatively estimated air concentrations (i.e., overestimated by comparison to actual expected exposure levels) at different locations. The concentration of a pollutant to which a member of the public is potentially exposed is critical to determining whether adverse health or welfare effects will occur. Toxicologists in TCEQ’s Toxicology Division use the results from the air dispersion modeling in their toxicological evaluations of the effects of proposed emissions. The objectives of the analysis are to: 1) establish off-property ground-level concentrations (“GLCs”) of contaminants resulting from proposed and/or existing emissions; and 2) evaluate these GLCs for their potential to cause adverse health or welfare effects. TCEQ’s effects evaluation process, which relies on air dispersion modeling results, includes three areas of review.

7. The first TCEQ effects evaluation looks at constituents for which the U.S. Environmental Protection Agency (“EPA”) has established a National Ambient Air Quality Standard (“NAAQS”), also known as “criteria pollutants.” In the State NAAQS Analysis, proposed emissions of criteria pollutants from the project are modeled to estimate maximum ground-level concentrations (“GLC_{max}”), with the objective of determining whether the project has the potential to cause or contribute to an exceedance of the NAAQS. EPA establishes each NAAQS at a level that is protective of public health and welfare with an adequate Margin of Safety (“MOS”). Employing conservative measures in deriving the NAAQS helps EPA to ensure that there is an adequate MOS between exposure concentrations associated with adverse health/welfare effects and the NAAQS.

As indicated in Table 1 below, which is from the Modeling Audit, the GLC_{max} for each NAAQS criteria pollutant to be authorized by the Permit for each applicable Averaging Time were all below the *de minimis* level; therefore, no further evaluation was warranted.

Table 1. Modeling Results for Minor NSR De Minimis

Pollutant	Averaging Time	GLC _{max} (µg/m ³)	De Minimis (µg/m ³)
PM ₁₀	24-hr	0.1	5
PM _{2.5}	24-hr	0.1	1.2
PM _{2.5}	Annual	0.01	0.2
NO ₂	1-hr	7	7.5
NO ₂	Annual	0.1	1
CO	1-hr	10	2000
CO	8-hr	3	500

Thus, the highest modeled criteria pollutant concentrations from proposed Exflur Facility sources at or beyond the fence line were below the *de minimis* NAAQS, otherwise known as Significant Impact Levels (“*SILs*”). Since the *SILs* are set at a small fraction of the health and welfare-protective NAAQS, these criteria pollutants are not expected to pose a health or welfare threat at or beyond the fence line.

8. Next, the second TCEQ effects evaluation is a State Property Line Standard analysis completed for sulfur compounds in which measured or modeled GLC_{max} are compared to TCEQ-derived State Property Line Standards in addition to the federal NAAQS. Since no sulfur compounds would be authorized from the Exflur Facility, no State Property Line Standard analysis was required as part of the Application process.

9. The third TCEQ effects evaluation involves a public health and welfare effects evaluation for constituents lacking a NAAQS or TCEQ State Property Line Standard. For these constituents, an evaluation is conducted in accordance with appendix D of TCEQ’s guidance entitled *Modeling and Effects Applicability Review: How to Determine the Scope of Modeling and Effects Review for Air Permits* (APDG 5874) (2018) (“*MERA*”). In the *MERA* evaluation, modeled GLC_{max} are compared to TCEQ-derived ESLs, which are health and/or welfare-based screening levels (not promulgated standards, such as the NAAQS and State Property Line Standards) used in the TCEQ permitting process. ESLs are only guidelines or screening levels that TCEQ sets at concentrations that correspond to a “no significant risk level.” Therefore, if predicted airborne concentrations of a compound exceed the relevant ESL, adverse health or welfare effects would not necessarily be expected to occur, but a more in-depth review would be triggered. Because they are designed to be preventative in nature, ESLs are set at levels: 1) below the threshold for health effects; 2) corresponding to an insignificant risk; or 3) where odor nuisance or vegetative effects are unlikely.

Setting ESLs at these conservative levels ensures that public health and welfare are protected by incorporating a MOS. TCEQ's MERA guidance establishes a process for determining the scope of air modeling and the extent of the health effects review necessary. Steps 1 through 7 of the MERA consist of conservative procedures used by air permitting engineers to evaluate the potential for health effects of air contaminants. The Toxicology Effects Evaluation Procedure located in Appendix D of the MERA is based on a three-tiered approach, with Tiers I, II, and III representing progressively more complex levels of review.

Tier I involves determining if the off-property GLC_{max} is below the ESL. If the GLC_{max} is below the ESL, adverse health/welfare effects are not expected. If the GLC_{max} is above the ESL, the analysis continues to the next tier. Tier II entails determining if the GLC_{max} occurs on industrial property. If the GLC_{max} occurs on industrial property and is less than or equal to two times the ESL, adverse health and welfare effects are not expected to occur. If the GLC_{max} occurs on non-industrial property (" GLC_{ni} ") and the GLC_{ni} is less than the ESL, adverse health/welfare effects are not expected to occur. If either the GLC_{max} on industrial property is greater than two times the ESL or the GLC_{ni} is greater than the ESL, the analysis continues to the next tier. Limiting the number of hours that an ESL can be exceeded by a particular magnitude reduces the likelihood of repeated exposure to concentrations above the ESL (which are set at levels that do not pose a significant risk) and further reduces the likelihood of health or welfare effects. Short-term ESLs are designed to be protective of more than a single 1-hour exposure and, therefore, as long as the frequency of those exceedances is limited, adverse health and welfare effects are not expected. A case-by-case Tier III Analysis is only conducted by TCEQ toxicologists for compounds that do not satisfy Tier I or Tier II criteria.

For constituents eliminated during the MERA process or in Tier I or II of the Toxicology Effects Evaluation Procedure, steps which only require comparing modeled air concentrations (i.e., GLC_{max} and GLC_{ni}) to ESLs (or multiples of the ESL), there is no need for a more detailed review by the Toxicology Division. In other words, the MERA process and Tier I and II of the Toxicology Effects Evaluation Procedure represent screening procedures by which a permit applicant can demonstrate that emissions of non-criteria pollutants from a facility will be protective of the public's health and welfare.

Table 2 shown below, which is from the Modeling Audit except that the 1-hr GLC_{max} for hydrogen fluoride (specifically, hydrogen fluoride for air permit review in agricultural areas) has been replaced by the 24-hr GLC_{max} for hydrogen fluoride in agricultural areas, which was obtained from the modeling output files ("exfluor_ag.out"), an excerpt (provided by Waid) of which is provided in **Exhibit 2**. This correction was made to Table 2 from the Modeling Audit because the ESL for hydrogen fluoride in agricultural areas ($3.0 \mu\text{g}/\text{m}^3$) reflects the 24-hr threshold that causes perceptible foliar injury in Conifers, per the TCEQ's Development Support Document ("**DSD**"). Therefore, the appropriate comparison is to the 24-hr GLC_{max} .

Table 2. Minor NSR Site-wide Modeling Results for Health Effects

Pollutant	CAS#	Averaging Time	GLC _{max} (µg/m ³)	GLC _{max} Location	GLC ₉₅ (µg/m ³)	GLC ₉₅ Location	ESL (µg/m ³)
hydrogen fluoride	7664-39-3	1-hr	6	-	<6	-	16
hydrogen fluoride For air permit reviews in agricultural areas	7664-39-3	24-hr	1.1	Eastern Property Line	-	-	3
hydrogen fluoride For air permit reviews in agricultural areas with cattle	7664-39-3	Annual	0.3	-	-	-	0.75
fluorine	7782-41-4	1-hr	3.9	Western Property Line	3.9	Western Property Line	2
perfluoroheptane	335-57-9	1-hr	22	-	<22	-	20000
methanol	67-56-1	1-hr	38	-	<38	-	3900
perfluorooctanoic acid and its inorganic salts	335-67-1	1-hr	<0.01	-	<0.01	-	0.05
bromine	7726-95-6	1-hr	5	-	<5	-	7
hydrogen chloride	7647-01-0	1-hr	4	-	<4	-	190
hydrogen chloride	7647-01-0	Annual	0.1	-	<0.1	-	7.9
carbon tetrafluoride	75-73-0	1-hr	154	-	<154	-	18000
Perfluoro (bis-2-chloroethoxy methane)	Not found	1-hr	7	-	<7	-	200
Perfluorodecalin	306-94-5	1-hr	22	-	<22	-	200
polymers of chlorotrifluoroethylene (PCTFE)	9002-83-9	1-hr	17	-	<17	-	50
carbonyl fluoride For air permit reviews in agricultural areas with cattle	353-50-4	Annual	0.03	-	<0.03	-	0.71
trifluoroacetic acid For air permit reviews in agricultural areas with cattle	76-05-1	Annual	0.03	-	<0.03	-	0.71

As reflected in Table 2, except for fluorine (1-hr Averaging Time), the modeled concentrations for constituents to which the Public Health and Welfare Effects Evaluation applies are well below applicable ESLs. Thus, no health or welfare impacts are expected for those constituents modeled to be well below the ESL.


The modeled 1-hr GLC_{max} for difluorine/fluorine (3.9 µg/m³) is slightly above the short-term ESL (2 µg/m³). The GLC_{max} occurs immediately adjacent to the western Exfluor property line in an uninhabited and undeveloped area where human exposure potential is extremely limited. Short-term ESLs are designed to be protective of more than a single 1-hour exposure and, therefore, as long as the frequency of those exceedances is limited, adverse health and welfare effects are not expected. Additional modeling indicated that concentrations of difluorine/fluorine were predicted to exceed the ESL for at most 99 out of 8,760 hours in a year (about 1% of the time) at the location of the GLC_{max}. Given the limited number of hours that the difluorine/fluorine ESL is exceeded, the small magnitude of the exceedance (less than two-fold), and the unpopulated area in which exceedances occur, the likelihood of health or welfare effects is extremely small.

Thus, the proposed emissions from the new Exfluor Facility do not pose an adverse health or welfare effect because of the small magnitude of the modeled GLC_{max} and the highly conservative nature of the ESLs.

10. As explained above, the maximum levels of pollutants to be authorized by the Application are a fraction of the state and federal standards and the state ESLs, which are conservatively designed to be protective of public health and welfare. The only exception is for difluorine/fluorine (1-hr Averaging Time) which was subject to additional review that indicated that emissions are not expected to pose a public health or welfare threat.

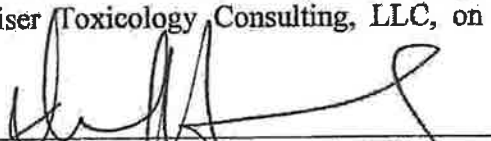
11. Based on the mapping of the "*Hearing Requester Locations*" as described in the Windolph Affidavit, I would not expect discernible impacts on Hearing Requesters who claim an interest within one mile of Exfluor's Facility from any pollutant for which authorization is requested by the Application. At greater distances than one mile, potential impacts are expected to be even less.

Further affiant sayeth not."



Lucy Fraiser
Fraiser Toxicology Consulting, LLC

This instrument was acknowledged before me, the undersigned authority, this 21st day of November, 2022, by Lucy Fraiser, Fraiser Toxicology Consulting, LLC, on behalf of said company.



Notary Public in and for the State of Arkansas



Exhibit 1:
Additional ESLs

Compounds for which ESLs are needed

Compound	CAS #	Formula	S.T. ESL (ug/m3) 50 (as PM); 1000 (as vapor)	L.T. ESL (ug/m3) 5 (as PM); 100 (as vapor)
Polychlorotrifluoroethylene (PCTFE)	9002-83-9	$[\text{C}_2\text{Cl}_2\text{F}_2]_n$		
1,10-decanediol	112-47-0	$\text{HO}(\text{CH}_2)_{10}\text{OH}$	50	5
Perfluorodecanolic acid	335-76-2	$\text{CF}_3(\text{CF}_2)_8\text{CO}_2\text{H}$	14	1.4
Perfluoroheptane	335-57-9	C_7F_{16}	200	20
Perfluorodecalin	306-94-5	$\text{C}_{10}\text{F}_{18}$	200	20
Trifluoroacetyl fluoride (Perfluoroacetyl fluoride)	354-34-7	$\text{CF}_3\text{-COF}$	200	20
perfluorobutyl fluoride		$\text{CF}_3(\text{CF}_2)_2\text{-COF}$	200	20
perfluoropentyl fluoride		$\text{CF}_3(\text{CF}_2)_3\text{-COF}$	200	20
perfluorohexyl fluoride		$\text{CF}_3(\text{CF}_2)_4\text{-COF}$	200	20
perfluoroheptyl fluoride		$\text{CF}_3(\text{CF}_2)_5\text{-COF}$	200	20
perfluorooctyl fluoride		$\text{CF}_3(\text{CF}_2)_6\text{-COF}$	200	20
perfluorononyl fluoride		$\text{CF}_3(\text{CF}_2)_7\text{-COF}$	200	20
perfluorodecyl fluoride		$\text{CF}_3(\text{CF}_2)_8\text{-COF}$	200	20
perfluorosuccinyl fluoride		$\text{FOC}(\text{CF}_2)_2\text{-COF}$	200	20
perfluoroglutaryl fluoride		$\text{FOC}(\text{CF}_2)_3\text{-COF}$	200	20
perfluoroadipoyl fluoride		$\text{FOC}(\text{CF}_2)_4\text{-COF}$	200	20
perfluorosebacyl fluoride		$\text{FOC}(\text{CF}_2)_6\text{-COF}$	200	20
Perfluorodisopropyl cyclohexane			200	20
Perfluoro-t-butylcyclohexane			200	20
Perfluorodimethyl naphthalene (also known as perfluoroperhydrodimethyl naphthalene)				20
92 Solvent (Ethane, 1,1'-[difluoromethylenebis(oxy)]bis[2-chloro- 1,1,2,2-tetrafluoro-])	130085-19-7	$\text{CF}_2\text{ClCF}_2\text{OCF}_2\text{OCF}_2\text{CF}_2\text{Cl}$	200	20

Exhibit 2:
24-hr GLC_{max} for Hydrogen Fluoride
(hydrogen fluoride for air permit review in agricultural areas)

Health Effects Analysis - NERA Step 3 & Step 7
 Determining Conservative Impact with Unit Impact Scaling

Scaled Impact Determination Sample Calculation

Hourly Hydrogen Fluoride Impact of EPN EP3-1
 $= 24\text{-hr Unit Impact EP3-1 } (\mu\text{g}/\text{m}^3) / (\text{lb}/\text{hr}) \bullet \text{EP3-1 Hourly HF ER (lb/hr)}$
 $= 19.466 (\mu\text{g}/\text{m}^3) / (\text{lb}/\text{hr}) \bullet 0.01$
 $= 0.14 \mu\text{g}/\text{m}^3$

Hourly Hydrogen Fluoride Impact of EPN FUG3-1
 $= 24\text{-hr Unit Impact EP3-1 } (\mu\text{g}/\text{m}^3) / (\text{lb}/\text{hr}) \bullet \text{EP3-1 Hourly HF ER (lb/hr)}$
 $= 7.636 (\mu\text{g}/\text{m}^3) / (\text{lb}/\text{hr}) \bullet 0.13$
 $= 0.96 \mu\text{g}/\text{m}^3$

	24-hour UHM ($\mu\text{g}/\text{m}^3$) / (lb/hr)			
	EP3-1	EP3-2	EP3-3	FUG3-1
Full Grid	19.59	12.07	12.61	9.28
Ag Grid	19.47	6.85	6.82	7.64
				FUG3-2
				FUG3-3
				FUG3-4

See "Exfluor.out"
See "Exfluor_Ag.out"

AERMOD Predicted Impacts ($\mu\text{g}/\text{m}^3$) - Scaled Hourly Impact

Non-Criteria Pollutant (Agriculture)	24-hr ESL ($\mu\text{g}/\text{m}^3$)		Hourly Impact ($\mu\text{g}/\text{m}^3$)		Short-Term Total		Impact Exceeds ESI?	
	EP3-1	EP3-2	EP3-3	FUG3-1	FUG3-2	FUG3-3	FUG3-4	
Hydrogen Fluoride (Agriculture)	3.00	0.14		0.96			1.11	FALSE

Application Exhibit 37

TCEQ ED - Response to Hearing Requests and Response to Requests for Reconsideration

**TCEQ AIR QUALITY PERMIT NUMBER 165848
TCEQ DOCKET NUMBER 2022-1552-AIR**

APPLICATION BY	§	BEFORE THE TEXAS
EXFLUOR RESEARCH	§	COMMISSION ON
CORPORATION	§	ENVIRONMENTAL QUALITY
FLORENCE, WILLIAMSON	§	
COUNTY	§	

EXECUTIVE DIRECTOR'S RESPONSE TO HEARING REQUESTS AND REQUESTS FOR RECONSIDERATION

I. INTRODUCTION

The Executive Director of the Texas Commission on Environmental Quality (Commission or TCEQ) files this response (Response) to the requests for reconsideration and contested case hearing submitted by persons listed herein regarding the above-referenced matter. The Texas Clean Air Act (TCAA), TEX. HEALTH & SAFETY CODE (THSC) § 382.056(n), requires the Commission to consider hearing requests in accordance with the procedures provided in TEX. WATER CODE (TWC) § 5.556.¹ This statute is implemented through the rules in 30 TEX. ADMIN. CODE (TAC) Chapter 55, Subchapter F.

Maps showing the location of the proposed plant are included with this Response and have been provided to all hearing requesters listed on the service list for this application. In addition, a current compliance history report, technical review summary, and a copy of the draft permit prepared by the Executive Director's staff have been filed as backup material for the commissioners' agenda. The Executive Director's Response to Public Comment (RTC), which was mailed by the chief clerk to all persons on the mailing list, is on file with the chief clerk for the Commission's consideration.

II. PLANT DESCRIPTION

Exflur Research Corporation (Applicant) has applied to the TCEQ for a New Source Review Authorization under TCAA § 382.0518. This will authorize the construction of a new facility that may emit air contaminants.

This permit will authorize the Applicant to construct the Exflur Research Facility. The plant is proposed to be located at 1100 County Road 236, Florence, Williamson County. Contaminants proposed to be authorized under this permit include hydrogen fluorides, carbon monoxide, particulate matter, hazardous air pollutants, nitrogen oxides, and organic compounds.

¹ Statutes cited in this response may be viewed online at www.statutes.legis.state.tx.us. Relevant statutes are found primarily in the THSC and the TWC. The rules in the TAC may be viewed online at www.sos.state.tx.us/tac/index.shtml, or follow the "Rules" link on the TCEQ website at www.tceq.texas.gov.

III. PROCEDURAL BACKGROUND

Before work is begun on the construction of a new facility that may emit air contaminants, the person planning the construction must obtain a permit from the Commission. This permit application is for an initial issuance of Air Quality Permit No. 165848.

The permit application was received on July 9, 2021 and declared administratively complete on July 14, 2021. The Notice of Receipt and Intent to Obtain an Air Quality Permit (first public notice) for this permit application was published in English on July 28, 2021, in the *Williamson County Sun* and in Spanish on July 29, 2021, in *El Mundo*. The Notice of Application and Preliminary Decision for an Air Quality Permit (second public notice) was published on March 6, 2022, in English in the *Williamson County Sun* and in Spanish on March 10, 2022, in *El Mundo*. A public meeting was held on June 16, 2022, in Florence, Texas. The public comment period ended on June 20, 2022. Because this application was received after September 1, 2015, it is subject to the procedural requirements of and rules implementing Senate Bill 709 (84th Legislature, 2015).

IV. APPLICABLE LAW FOR REQUESTS FOR RECONSIDERATION

Any person may file a request for reconsideration of the Executive Director's decision. However, for the Commission to consider the request, it must substantially comply with the following requirements set forth in 30 TAC § 55.201(e): give the name, address, daytime telephone number and, when possible, fax number of the person who files the request; expressly state that the person is requesting reconsideration of the Executive Director's decision; and give reasons why the decision should be reconsidered.

V. RESPONSE TO REQUESTS FOR RECONSIDERATION

Although the Executive Director determined that the permit application meets the applicable rules and requirements, a final decision to approve the draft permit has not been made. The application must be considered by the commissioners of the TCEQ at a regularly scheduled public meeting before any final action can be taken on the application.

The TCEQ received timely requests for reconsideration from Nicole Elizabeth Bauer, Alycen Malone, Shannon White-Shubert and the North San Gabriel Alliance.² In general, the requests for reconsideration reiterated concerns that the Executive Director responded to in the RTC. North San Gabriel Alliance attached a letter from Dr. Neil Carman to its request, which it states supports reconsideration of the draft permit. Dr. Carman expressed his opinions concerning the TCEQ's air permitting process in general, the monitoring and recordkeeping requirements of the permit, best available control technology (BACT), and other issues unrelated to this application; the Executive Director responded to similar concerns in the RTC. North San Gabriel Alliance also referenced several RTC responses with which it disagreed and requested these issues

² The commission also received requests for reconsideration from Jillian Gabriel, Richard Grabish, Timothy McDaniel, and Karen Milone. However, because these requests were submitted during the comment period, the Executive Director treated them as comments and responded to them in the RTC.

be referred to SOAH. Neither Nicole Elizabeth Bauer, Alycen Malone, nor Shannon White-Shubert indicated which RTC responses they wanted the Executive Director to reconsider. The Executive Director will respond to the requests for reconsideration under the RTC Response that best matches the issue or concern. The Executive Director provides the following response to the requests for reconsideration.

REQUEST FOR RECONSIDERATION OF RESPONSE 5: Air Quality / Health Effects

North San Gabriel Alliance requested reconsideration of Response 5 stating that it does not believe the proper analysis was conducted and therefore, disagrees that the draft permit will be protective of human health and welfare and the environment, particularly sensitive subgroups such as children, the elderly, or people with existing respiratory conditions. North San Gabriel Alliance gave two reasons for its disagreement with Response 5. First, North San Gabriel Alliance expressed concern that hydrogen fluoride and fluorine emissions exceeded the ESLs. Second, North San Gabriel Alliance stated that the Executive Director did not respond to concerns about PFAS chemicals, which they state was not an insignificant oversight and warrants reconsideration. North San Gabriel Alliance also referenced Dr. Carman's letter, which it states supports reconsideration of the draft permit. Dr. Carman expressed several opinions concerning PFAS chemicals and potential adverse effects and his opinion that the only truly safe level of emissions is zero and that PFAS chemicals should be banned.

In her request for reconsideration, Shannon White-Shubert stated that she is concerned for her health and believes there are critical health and environmental concerns associated with the proposed plant.

EXECUTIVE DIRECTOR'S RESPONSE: The Executive Director responded to comments and concerns about whether the draft permit would be protective of human health, welfare, and the environment, including sensitive subgroups throughout the RTC and in particular in Responses 5 and 6. Response 5 explained the Executive Director's duty to review permit applications to ensure the emissions proposed to be authorized will be protective of human health and the environment, explained the technical review of the application, and the Executive Director's conclusion that the emissions authorized by this permit will be protective of both human health and welfare and the environment.

As outlined in Response 5, the U.S. Environmental Protection Agency (EPA) sets the NAAQS, such that primary standards protect public health, including sensitive members of the population such as children, the elderly, and those individuals with preexisting health conditions. Secondary NAAQS protect public welfare from any known or anticipated adverse effects from air contaminants. The criteria pollutants proposed to be authorized are at levels so low that none of them exceeded the de minimis level.

North San Gabriel Alliance indicated that the Executive Director did not respond to comments concerning PFAS chemicals; however, Response 5 included several paragraphs explaining how non-criteria pollutants, which include PFAS chemicals, were considered and evaluated by the Executive Director's staff. In addition, Response 5 included a table outlining the specific noncriteria pollutants that were evaluated and their maximum predicted ground level concentration in comparison to the ESLs. North San Gabriel Alliance argues that a proper review of PFAS chemicals was not conducted but other than expressing concern that hydrogen fluoride and fluorine emissions

exceeded the ESLs, it did not offer any specifics as to what it alleges was deficient about the technical review. Response 5 explained that the emissions of hydrogen fluoride and fluorine exceeded the ESLs. However, as explained in Response 5, ESLs are not regulatory standards that cannot be exceeded but rather, are guidelines used in the review on non-criteria pollutants. Thus, if a pollutant is above its the ESL, it is not indicative of an adverse effect but rather that further evaluation is warranted. Response 5 explained that the TCEQ's Toxicology Division conducted an analysis of hydrogen fluoride and fluorine in order to evaluate potential exposures and assess human health risks to the public. The Toxicology Division determined that the potential impacts are acceptable given the conservative nature of both the ESLs and the emissions estimates.

North San Gabriel Alliance referenced Dr. Carman's letter, which it states supports reconsideration of the draft permit. The Executive Director reviewed the letter from Dr. Carman and does not agree it supports reconsideration. In the letter, Dr. Carman expressed concern about air pollution in general and impacts to Texans living near industrial facilities. These concerns, as they related to this application, were addressed throughout the RTC and in particular, Response 5, which explained the health effects evaluation of the emissions proposed to be authorized.

Dr. Carman also expressed concern that industrial plants can be "leaky" and refers to a movie about chemical releases from plant in West Virginia that is not the subject of this permit application. However, as described in more detail below, the Executive Director responded to comments and concerns about the monitoring requirements of the permit in Response 16 and about potential emission events in Response 22.

Dr. Carman expressed general concern about emissions of benzene, 1,3-butadiene, vinyl chloride, ethylene oxide, dioxins, and dibenzofurans; however, as was shown in Response 5, Table 2, these pollutants are not proposed to be authorized by the draft permit. Dr. Carman also expressed concern about the potential for adverse health effects from PFAS chemicals and stated that EPA has recently raised serious public health and environmental concerns and indicated it will list PFAS, PFOA, and PFOS as hazardous substances under the Superfund law and may potentially ban production of some organofluorines. As described in the RTC and in this Response, this application seeks to authorize emissions under the Texas Clean Air Act, not Superfund. Thus, neither the current Superfund law nor potential future amendments to Superfund are implicated in the review of this application. Depending on the nature of its operations, the Applicant may be required to comply with other existing or future regulatory actions. However, the potential for future regulatory actions is outside the scope of the review of this application and does not support reconsideration.

Dr. Carman expressed his opinion that EPA, TCEQ, and the FDA should ban PFAS, PFOA, and PFOS and referred to the nonprofit group, Toxin Free USA's, lawsuit against Procter & Gamble and general efforts to raise awareness about the chemicals. Unrelated litigation, advocacy by a nonprofit group, or private opinions are not controlling for the application at issue and do not support reconsideration.

REQUEST FOR RECONSIDERATION OF RESPONSE 6: Environmental Concerns / Flora and Fauna/ Endangered Species

North San Gabriel Alliance requested reconsideration of Response 6 stating that it disagrees with the Executive Director's response and maintains that it has not been demonstrated that the draft permit will be protective of animal life, including

livestock, wildlife, and endangered species, or of vegetation and surrounding property. North San Gabriel Alliance reiterated its contention that a proper analysis was not conducted for PFAS chemicals as a basis for reconsideration of this Response. In addition, North San Gabriel Alliance referred to the Executive Director's reference to the prohibition on causing a nuisance at 30 TAC § 101.4 and stated that this response acknowledges that the Executive Director has jurisdiction and the obligation to ensure that it does not permit the discharge of contaminants in violation of section 101.4. Nuisance conditions are not expected if the plant is operated in compliance with the terms of the permit.

North San Gabriel Alliance through Dr. Carman expressed concern that the Applicant may emit "unburned PFAS compounds" and stated that hydrogen fluoride emissions are unsafe and may impact local vegetation, animals, and leave trace residues. In addition, Dr. Carman questioned whether the Applicant would agree to fund PFAS soil testing in the area around the proposed plant and expressed his opinions regarding soil testing by other companies.

Shannon White-Shubert requested reconsideration and expressed concern about potential impacts to the bees she keeps on her property and her trees.

EXECUTIVE DIRECTOR'S RESPONSE: As described above, in Response 5 the Executive Director explained the technical review of the application and how the emissions proposed to be authorized complied with the NAAQS. That response also explained the health effects review conducted for the non-criteria pollutants proposed to be authorized. In Response 6, the Executive Director reiterated that the secondary NAAQS are set to protect public welfare and the environment, including animals, crops, vegetation, visibility, and structures, from any known or anticipated adverse effects associated with the presence of a contaminant in the ambient air. Response 6 explained that the air contaminants proposed to be authorized were evaluated in accordance with applicable federal and state rules and regulations and that it was determined that adverse effects to animal life, crops, or vegetation are not expected. The Executive Director notes that 30 TAC § 101.4 is not a permitting standard, but rather is a general prohibition on causing a nuisance.

Comments concerning the emission controls required by the draft permit were addressed in Response 12. Comments concerning the potential for soil testing were not raised during the comment period. Nonetheless, the applicable state and federal statutes and rules that govern this air quality permit application do not include provisions requiring soil testing.

REQUEST FOR RECONSIDERATION OF RESPONSE 7: Air Dispersion Modeling / Evaluation of the Surrounding Area

North San Gabriel Alliance stated it disagrees with the Executive Director's response that the air dispersion modeling was appropriate and representative of site-specific conditions and that the procedures, methodology, predictions, and results are acceptable.

EXECUTIVE DIRECTOR'S RESPONSE: The Executive Director responded to comments concerning the air quality analysis, including the air dispersion modeling, in Response 7. This Response explained that the modeling procedures, methodology, predictions, and results were audited by the TCEQ's Air Dispersion Modeling Team (ADMT) in accordance with the procedures in TCEQ's Air Quality Modeling Guidelines. The

evaluation incorporated all emissions proposed to be authorized, as represented in the permit application, and the ADMT determined the modeling was acceptable. North San Gabriel Alliance did not provide any information on what specifically it alleges was deficient or what applicable guidance, rules, or regulations were not appropriately followed. Accordingly, the Executive Director does not have additional information to provide beyond what was included in the RTC.

REQUEST FOR RECONSIDERATION OF RESPONSE 10: Water Concerns

Nicole Elizabeth Bauer urged reconsideration on the basis of potential water system contamination.

EXECUTIVE DIRECTOR'S RESPONSE: The Executive Director responded to concerns about water contamination in Response 10 and explained that issues regarding water use, water quality, or potential discharges are not within the scope of the review of this application.

REQUEST FOR RECONSIDERATION OF RESPONSE 12: Best Available Control Technology (BACT)

North San Gabriel Alliance stated it disagrees that a proper BACT analysis for the sources and types of contaminants emitted was conducted, particularly given the "dangerous chemicals" that will be emitted from the proposed plant. North San Gabriel Alliance reiterated its contention that the Executive Director did not respond to concerns about PFAS chemicals and, through Dr. Carman, expressed concern that PFAS chemicals could escape destruction by the thermal oxidizer and that because industrial equipment will breakdown at some point, higher than authorized emissions will be emitted. Dr. Carman also expressed his opinion that the plant should not be built due to the risk of the thermal oxidizers failing to control emissions.

EXECUTIVE DIRECTOR'S RESPONSE: In Response 12, the Executive Director explained the evaluation of BACT, described the specific controls proposed to be used, and explained that the permit reviewer evaluated the proposed BACT and confirmed it to be acceptable. North San Gabriel Alliance did not specify any facility or contaminant it alleges does not meet BACT or state what specifically it alleges was deficient about the BACT review but attached Dr. Carman's letter which expressed concern that the controls might not work as intended. In accordance with 30 TAC § 116.116, an applicant is bound by its representations in the application and those representations become an enforceable part of the permit. In addition, 30 TAC § 116.115(b)(2)(G) states that "the permitted facilities shall not be operated unless all air pollution emission capture and abatement equipment is maintained in good working order and operating properly during normal facility operations..." Further, as described in Response 16, the draft permit requires the Applicant to perform stack sampling and other testing as required to establish the actual pattern and quantities of air contaminants being emitted into the atmosphere from the thermal oxidizers to demonstrate compliance with the permit. The Executive Director is not persuaded that a concern that the required controls might not work justifies reconsideration and without any details about what specifically North San Gabriel Alliance alleges was deficient, the Executive Director does not have additional information to provide.

REQUEST FOR RECONSIDERATION OF RESPONSE 13: Emissions Calculations

North San Gabriel Alliance stated it disagrees that the Applicant demonstrated appropriate methodologies and control efficiencies were used in calculating emissions rates.

EXECUTIVE DIRECTOR'S RESPONSE: Response 13 explained that in accordance with 30 TAC § 116.116(a), the Applicant is bound by its representations, including the represented performance characteristics of the control equipment. In addition, the Executive Director explained how emissions from the proposed plant were calculated. These calculations were reviewed by the permit reviewer who determined they were conducted correctly using appropriate methodologies and control efficiencies. North San Gabriel Alliance did not provide information on what specifically it alleges was deficient about the emissions calculations. Similarly North San Gabriel Alliance did not indicate which calculations it alleges were not completed using appropriate methodologies or what methodologies it alleges should have been used. Therefore, the Executive Director does not have additional information to provide beyond what was included in the RTC.

REQUEST FOR RECONSIDERATION OF RESPONSE 14: Chemical Flexibility

North San Gabriel Alliance stated it disagrees with the Executive Director that allowance of chemical flexibility is appropriate at this site and for this Applicant.

EXECUTIVE DIRECTOR'S RESPONSE: The Executive Director responded to North San Gabriel Alliance's comment that chemical flexibility should not be allowed in Response 14. However, the North San Gabriel Alliance did not give any specific reason or point to any applicable state or federal rule or regulation or guidance it believes prohibits chemical flexibility. Accordingly, the Executive Director does not have additional information to provide other than the explanation of chemical flexibility, how additional chemicals may be authorized, and how impacts are evaluated that was provided in Response 14.

REQUEST FOR RECONSIDERATION OF RESPONSE 15: Hours of Operation

In Shannon White-Shubert's request for reconsideration, she expressed concern that manufacturing activities would occur 24/7. North San Gabriel Alliance stated it disagrees with the Executive Director's Response 15 stating that no conditions exist that would allow TCEQ to limit the hours of operation at the proposed plant.

EXECUTIVE DIRECTOR'S RESPONSE: In Response 15, the Executive Director explained that TCEQ has not been delegated the authority to regulate the hours of operations of a facility or site if the permit review demonstrates all applicable federal and state regulations are met. The response also referred to Response 5 which explained the health effects review of the application. North San Gabriel Alliance stated it disagrees with the response that no conditions exist to limit the operating hours of the proposed plant but does not point to any conditions it alleges would provide the authority for the Executive Director to do so. Accordingly, the Executive Director does not have additional information to provide beyond what was included in the RTC.

REQUEST FOR RECONSIDERATION OF RESPONSE 16: Monitoring & Recordkeeping

North San Gabriel Alliance stated it disagrees that the draft permit will ensure compliance based on what it described as the Applicant's extensive poor compliance and disaster response history. However, North San Gabriel Alliance did not state which

facilities it believes will not be sufficiently monitored or which of the Special Conditions it alleges does not assure compliance, other than including Dr. Carman's letter which references using a CEMS. Specifically, Dr. Carman stated he could not determine whether PFAS chemicals would be continuously monitored and stated that without a PFAS CEMS, the exact amount of emissions would be unknown. Dr. Carman also expressed concern that industrial plants can be leaky and referenced equipment handling and processing and chemicals listed as HAPs by EPA.

In the letter attached to North San Gabriel Alliance's request, Dr. Carman generally complained about the TCEQ's air permitting process and what he called "legal loopholes" that allow permits to be issued without proper monitoring for VOC emissions. In addition, Dr. Carman generally criticized TCEQ and EPA enforcement actions as they relate to VOC emissions and expressed concern that the vast majority of industrial plants file self-reports of estimated VOC emissions rather than installing a CEMS. Dr. Carman cited these self-reports as a flaw in TCEQ's annual Emissions Inventory or PSD database and EPA's annual TRI data.

EXECUTIVE DIRECTOR'S RESPONSE: The Executive Director responded to concerns about the monitoring and recordkeeping requirements included in the draft permit in the RTC. General concerns about enforcement or specific issues concerning other industrial facilities are outside the scope of the review of this application. In addition, although issues with both TCEQ's Emissions Inventory and the EPA's TRI are outside the scope of the review of this application, the Executive Director notes that as a minor source of emissions, the proposed plant is not subject to the Emission Inventory reporting requirements in the TCEQ rules. In addition, the Executive Director also notes that the use of calculations to estimate emissions and reliance on EPA's AP-42 Compilation of Air Emission Factors (AP-42) guidance is a common practice throughout the industry.

In Response 16, the Executive Director explained how emissions will be required to be monitored and what records the Applicant will be required to keep in order to demonstrate compliance. Response 16 also explained that the draft permit requires the Applicant to perform stack sampling and other testing as required to establish the actual pattern and quantities of air contaminants being emitted into the atmosphere from the thermal oxidizers to demonstrate compliance with the permit.

In Response 12, the Executive Director also explained that the Applicant proposed the use of the 28AVO program for monitoring components in hydrogen fluoride (HF) service. The 28AVO inspection program is a leak detection and repair (LDAR) program used to inspect fugitive components and identify and repair leaks and requires a physical walk-through inspection every four hours with repair or containment of leaks within one hour of detection and identification. Further, as the Executive Director explains in response to the request for reconsideration of Response 21 below, the Applicant's compliance history did not warrant changes to the draft permit. Similarly, the Executive Director responded to concerns about potential disasters and emergency response in Response 22 of the RTC and will respond to requests for reconsideration of that response below.

REQUEST FOR RECONSIDERATION OF RESPONSE 17: Future Permitting Actions

Alycen Malone stated that she believes the Applicant intends to expand its business and expressed concern about future increases in pollution. North San Gabriel Alliance, through Dr. Carman, also expressed concern about potential changes to permits.

Dr. Carman expressed his opinion that once in operation, it is not uncommon for industrial facilities to request additional permitting for expanded production. He opined that this practice results in what started as a small facility, becoming a major, mostly unregulated, regional polluter.

EXECUTIVE DIRECTOR'S RESPONSE: Permit amendments are governed by TCAA § 382.0518, which provides that a permit must be obtained prior to construction of a new facility or a modification of an existing facility that may emit air contaminants. *See* TEX. HEALTH & SAFETY CODE § 382.0518; *see also generally* 30 TAC § 116.111 (providing requirements that must be met in order for a permit or amendment to be granted).

Neither Ms. Malone nor the North San Gabriel Alliance expressed concern about future permitting actions during the comment period. However, the Executive Director responded to concerns about potential future permitting actions raised by other commenters. Response 17 explained that a permit holder may not vary from any representation or permit condition without obtaining a permit amendment if the modification will cause a change in the method of control of emissions, a change in the character of the emissions, or an increase in the emissions rate of any air contaminant. The RTC also explained that the TCEQ does not have jurisdiction to prohibit anyone from seeking authorization to emit air contaminants; nor can the TCEQ prohibit owners and operators from receiving authorization to emit air contaminants if they comply with all applicable statutory and regulatory requirements. However, as explained in the RTC any potential future application would need to demonstrate that the proposed facility would utilize the best available control technology (BACT) and that the proposed emissions would not cause or contribute to a violation of the NAAQS or adverse health effects.

REQUEST FOR RECONSIDERATION OF RESPONSE 18: Location / Trucks / Traffic / Roads / Quality of Life / Aesthetics / Property Value

Alycen Malone stated the country roads near the proposed location of the plant cannot handle truck traffic the business would bring and questioned whether potential impacts to property values were considered. Ms. Malone also reiterated a concern about location and stated the proposed plant backs up to a nature reserve and homes. She stated the Applicant could easily go to another place. In his letter attached to North San Gabriel Alliance's request, Dr. Carman stated it encouraged the Applicant to expand its existing plant or look for another site in an industrial park.

Shannon White-Shubert stated that a specialty chemical manufacturing plant does not belong in a rural community.

EXECUTIVE DIRECTOR'S RESPONSE: The Executive Director explained in Response 18 that concerns regarding the location an applicant chooses for a proposed facility, trucks and truck traffic, roads, and the consideration of potential impacts to property values are outside the TCEQ's jurisdiction. Therefore the TCEQ does not have the authority to consider these concerns in the review of an air quality permit application. However, the Executive Director explained the health effects review conducted to ensure that there will be no adverse impacts to human health and welfare throughout the RTC and, in particular, Responses 5 and 6.

REQUEST FOR RECONSIDERATION OF RESPONSE 19: Public Infrastructure and Utilities

In her request for reconsideration, Alycen Malone expressed concern about the utilities in the area being unstable. In her request for reconsideration, Shannon White-Shubert also reiterated her concern that the City of Florence is not equipped to serve industrial or chemical manufacturing needs due to the lack of reliable utilities, including water, sewer, and power and infrastructure such as a fire department or emergency response teams.

EXECUTIVE DIRECTOR'S RESPONSE: The Executive Director responded to concerns about public infrastructure and the reliability of utilities in Response 19. As the Executive Director explained in that Response, issues related to public infrastructure or the availability of utilities are outside the scope of review of an air quality permit.

REQUEST FOR RECONSIDERATION OF RESPONSE 21: Compliance History / Enforcement / Penalties

North San Gabriel Alliance stated that changes to the draft permit are justified based on the Applicant's history of noncompliance at its existing plant. In addition, the North San Gabriel Alliance expressed concern that the Executive Director did not acknowledge this issue was raised in their comments submitted during the comment period and did not specifically indicate whether changes to the draft permit were made as a result of the Applicant's compliance history.

EXECUTIVE DIRECTOR'S RESPONSE: The Executive Director acknowledges North San Gabriel Alliance commented concerning the Applicant's compliance history in its timely comments. North San Gabriel Alliance stated changes are warranted but did not state what specific changes it believes should be made to the draft permit. As explained throughout the RTC, the draft permit lists the only emissions proposed to be authorized. In addition, the Executive Director responded to comments concerning the Applicant's compliance history in Response 21. The Response explained how the Applicant's compliance history was reviewed by the Executive Director's staff during the technical review of the application. In addition, the Response provided the site's and Applicant's compliance history ratings, which are "unclassified" and "satisfactory," respectively. TCEQ rules provide that unsatisfactory performers may be subject to additional oversight to improve environmental compliance. *See* 30 TAC § 60.3 (Use of Compliance History). Accordingly, the Executive Director did not propose changes to the permit to address compliance because a satisfactory compliance history rating did not warrant changes to the draft permit.

REQUEST FOR RECONSIDERATION OF RESPONSE 22: Emissions Events / Spills / Safety / Emergency Response

In her request for reconsideration, Alycen Malone stated that the Applicant's facilities have been known to leak. Ms. Malone also expressed concern about the potential for the plant to be destroyed by a tornado and questioned whether toxic chemicals would swirl directly into homes during such a natural disaster. She also expressed concern that emergency services surrounding the site are not hazmat equipped. In Shannon White-Shubert's request for reconsideration, she also expressed concern about the potential for emission events or chemicals spills.

North San Gabriel Alliance stated it disagrees with the response that the requirement to submit a Risk Management Plan in the future and after issuance of the draft permit is adequate given a previous emergency situation at the Applicant's other plant. North San Gabriel Alliance stated that any new permit must not allow for special conditions to be added after-the-fact to ensure compliance with applicable requirements.

EXECUTIVE DIRECTOR'S RESPONSE: The Executive Director responded to concerns regarding emissions events, the potential for spills, safety issues, and emergency response in Response 22. Specifically, the Executive Director explained that the draft permit lists the only emissions authorized to be emitted from the proposed plant and also explained the process and rules, incumbent on the Applicant, to report an emissions event. The response further explained that the Local Emergency Planning Committee and the regulated entity have the primary responsibility in an emergency.

The Executive Director responded to comments concerning whether the application should have included a Risk Management Plan in Response 22, which explained the Risk Management Program administered by EPA and what would trigger a TCEQ disaster review. However, the Executive Director believes North San Gabriel Alliance may be confusing the requirement to submit a Risk Management Plan prior to exceeding a threshold quantity of hydrogen fluoride with applicable requirements that become conditions of air quality permits. The requirement to comply with EPA's regulations under the Risk Management Program is triggered on the date a threshold quantity of regulated substance is first met. Thus, it is not uncommon for an applicant to not have a Risk Management Plan prepared prior to startup, which is why the Executive Director included the requirement that the Applicant submit its Risk Management Plan prior to exceeding a threshold quantity of hydrogen fluoride.

Because this application proposed to authorize hydrogen fluoride (HF) in an amount above the threshold quantity, codified by EPA at 40 C.F.R. § 68.130, the Applicant will be required to implement a risk management program and submit its Risk Management Plan for all covered processes to both TCEQ and EPA. As part of its disaster review, the agency requests that applicants subject to EPA's Risk Management Program submit a copy of the applicable Risk Management Plan to the TCEQ. However, as Response 22 explained, the TCEQ has not been delegated the authority to administer EPA's Risk Management Program. Accordingly, the Applicant's Risk Management Plan will be kept of file after it is submitted but will not authorize or result in changes or amendments to the draft permit.

VI. THE EVALUATION PROCESS FOR HEARING REQUESTS

House Bill 801 established statutory procedures for public participation in certain environmental permitting proceedings, specifically regarding public notice and public comment and the Commission's consideration of hearing requests. Senate Bill 709 revised the requirements for submitting public comment and the Commission's consideration of hearing requests. The evaluation process for hearing requests is as follows:

A. Response to Hearing Requests

The Executive Director, the Public Interest Counsel, and the Applicant may each submit written responses to a hearing requests. 30 TAC § 55.209(d).

Responses to hearing requests must specifically address:

- 1) whether the requestor is an affected person;
- 2) which issues raised in the hearing request are disputed;
- 3) whether the dispute involves questions of fact or of law;
- 4) whether the issues were raised during the public comment period;
- 5) whether the hearing request is based on issues raised solely in a public comment withdrawn by the commenter in writing by filing a withdrawal letter with the chief clerk prior to the filing of the Executive Director's Response to Comment;
- 6) whether the issues are relevant and material to the decision on the application; and
- 7) a maximum expected duration for the contested case hearing.

30 TAC § 55.209(e).

B. Hearing Request Requirements

In order for the Commission to consider a hearing request, the Commission must first determine whether the request meets certain requirements:

Affected persons may request a contested case hearing. The request must be made in writing and timely filed with the chief clerk. The request must be based only on the requestor's timely comments and may not be based on an issue that was raised solely in a public comment that was withdrawn by the requestor prior to the filing of the Executive Director's Response to Comment.

30 TAC § 55.201(c).

A hearing request must substantially comply with the following:

- 1) give the time, address, daytime telephone number, and where possible, fax number of the person who files the request. If the request is made by a group or association, the request must identify one person by name, address, daytime telephone number, and where possible, fax number, who shall be responsible for receiving all official communications and documents for the group;
- 2) identify the person's personal justiciable interest affected by the application, including a brief, but specific, written statement explaining in plain language the requestor's location and distance relative to the proposed facility or activity that is the subject of the application and how and why the requestor believes he or she will be adversely affected by the proposed facility or activity in a manner not common to members of the general public;
- 3) request a contested case hearing;
- 4) list all relevant and material disputed issues of fact that were raised during the public comment period and that are the basis of the hearing request. To facilitate the commission's determination of the

number and scope of issues to be referred to hearing, the requestor should, to the extent possible, specify any of the Executive Director's responses to comments that the requestor disputes and the factual basis of the dispute and list any disputed issues of law; and

- 5) provide any other information specified in the public notice of application.

30 TAC § 55.201(d).

C. Requirement that Requestor be an Affected Person/ "Affected Person" Status

In order to grant a contested case hearing, the Commission must determine that a requestor is an "affected" person. Section 55.203 sets out who may be considered an affected person.

- a) For any application, an affected person is one who has a personal justiciable interest related to a legal right, duty, privilege, power, or economic interest affected by the application. An interest common to members of the general public does not qualify as a personal justiciable interest.
- b) Except as provided by 30 TAC § 55.103, governmental entities, including local governments and public agencies with authority under state law over issues raised by the application may be considered affected persons.
- c) In determining whether a person is an affected person, all factors shall be considered, including, but not limited to, the following:
 - 1) whether the interest claimed is one protected by the law under which the application will be considered;
 - 2) distance restrictions or other limitations imposed by law on the affected interest;
 - 3) whether a reasonable relationship exists between the interest claimed and the activity regulated;
 - 4) likely impact of the regulated activity on the health and safety of the person, and on the use of property of the person;
 - 5) likely impact of the regulated activity on use of the impacted natural resource by the person;
 - 6) for a hearing request on an application filed on or after September 1, 2015, whether the requestor timely submitted comments on the application which were not withdrawn; and
 - 7) for governmental entities, their statutory authority over or interest in the issues relevant to the application.

30 TAC § 55.203

In regard specifically to air quality permits, the activity the Commission regulates is the emissions of air contaminants into the atmosphere. Any person who plans to construct or modify a facility that may emit air contaminants must receive authorization from the Commission. In addition, Commission rules also include a

general prohibition against causing a nuisance. Further, for air quality permits, distance from the proposed facility is particularly relevant to the issue of whether there is a likely impact of the regulated activity on a person's interests because of the dispersion and effects of individual air contaminants emitted from a facility.

For applications filed on or after September 1, 2015, 30 TAC § 55.201(d) allows the Commission to consider, to the extent consistent with case law:

1. the merits of the underlying application and supporting documentation in the commission's administrative record, including whether the application meets the requirements for permit issuance;
2. the analysis and opinions of the Executive Director; and
3. any other expert reports, affidavits, opinions, or data submitted by the Executive Director, the applicant, or hearing requestor.

D. Referral to the State Office of Administrative Hearings

"When the commission grants a request for a contested case hearing, the commission shall issue an order specifying the number and scope of the issues to be referred to SOAH for a hearing." 30 TAC § 50.115(b). The Commission may not refer an issue to SOAH for a contested case hearing unless the Commission determines that the issue:

- 1) involves a disputed question of fact or a mixed question of law and fact;
- 2) was raised during the public comment period by an affected person whose hearing request is granted; and
- 3) is relevant and material to the decision on the application.

30 TAC § 50.115(c).

VII. ANALYSIS OF THE HEARING REQUESTS

The commission received timely hearing requests from the following persons: Nicole Elizabeth Bauer, Ann Beville, Thomas Beville, Sheryl Marie Farley, Elizabeth Ann Friou, Kelley Heath, Suzanne Johnson, Catherine Johnston, Charles Ely McCormick, Joyce McCormick, Nickolas McCormick, Charles McCormick, Erin McCormick, Henry N. Mulvihill, Patricia McCormick Mulvihill, Joe J. Pacheco, Chris Peyton, Renee Peyton, Sandra Lee Thurman, Brittany D. Varner, Harold Charles Wardlaw, Peggy Ann McCormick Wardlaw, Shannon White-Shubert, Haziell McCormick Williams, and the North San Gabriel Alliance. The Executive Director has analyzed the hearing requests to determine whether they comply with Commission rules, if the requestors qualify as affected persons, what issues may be referred for a contested case hearing, and what is the appropriate length of the hearing.

A. Persons the Executive Director Recommends the Commission Find are Affected Persons

1. Elizabeth Ann Friou

The Executive Director reviewed the factors found in 30 TAC § 55.201(c) and (d), and § 55.203 for determining whether a requestor is an affected person, and recommends the Commission find that Elizabeth Ann Friou is an affected person.

Ms. Friou submitted three requests for a contested case hearing during the comment period and one hearing request during the 30-day period after the RTC was mailed out by the Commission. Her hearing requests were in writing, provided the required contact information, and included issues that are the basis of the hearing request. Some of the issues raised in this hearing request were based on timely filed comments. Ms. Friou is asthmatic and suffers from chronic obstructive pulmonary disease (COPD). In her hearing requests, she expressed concern about adverse health effects on her personally and on her ranching employees as well as impacts to her land, livestock, and wildlife. In addition, Ms. Friou is concerned that the proposed plant will impact the use and enjoyment of her property.

Elizabeth Ann Friou owns two parcels of land and stated she will be the proposed plant's immediate neighbor directly across the street from the proposed location. Based on the address provided and county property records, the Executive Director determined the closest point on Ms. Friou's property is located approximately 0.1 miles from the proposed plant. For air authorizations, distance from the proposed plant is particularly relevant to the issue of whether there is a likely impact of the regulated activity on a person's interests because of the dispersion and effects of individual air contaminants emitted from a facility. The natural resource that is the subject of this permit is the ambient air an individual breathes.

Ms. Friou does not reside on the property and provided the Commission with a mailing address in Austin, Texas. She did not indicate how often she is on the property but provided some information about how the property is used. Specifically, she stated that she and her employees work outdoors, grazing horses and managing pasture. She stated she will suffer significant losses if the draft permit fails to protect her health and interests and that based on the Applicant's compliance history, there is no guarantee it will comply with the permit. Based on the location of her property, issues raised, and interests affected by the application, Elizabeth Ann Friou has identified personal justiciable interests not common to members of the general public. Therefore, the Executive Director recommends that the Commission find that Elizabeth Ann Friou is an affected person based on the criteria set out in 30 TAC § 55.203.

In her hearing request, Ms. Friou raised the following issues that were also raised in her timely comments:

Issue 1: *Whether the proposed plant will negatively affect air quality.*

Issue 2: *Whether the proposed plant will negatively affect human health, including sensitive subgroups and physical property.*

Issue 3: *Whether the proposed plant will negatively affect welfare, including plants, animals, and the environment.*

Issue 5: *Whether the proposed plant will cause a nuisance or interfere with the use and enjoyment of property.*

Issue 9: *Whether the air dispersion modeling was representative of the proposed location and adequately evaluated potential impacts to nearby receptors, including residences and ranches.*

Issue 11: *Whether the draft permit contains adequate monitoring and recordkeeping requirements to assure compliance with all applicable rules and requirements.*

Issue 12: *Whether the proposed operating hours of the plant ensure that there will be no adverse impacts to human health, welfare, and the environment.*

Issue 14: *Whether the Applicant's compliance history warrants changes to the draft permit.*

Issue 15: *Whether the condition in the draft permit requiring the submission of a risk management plan prior to exceeding a threshold quantity of hydrogen fluoride is adequate.*

Issue 17: *Whether the proposed location of the plant is suitable for the chemical plant.*

Issue 23: *Whether potential emissions events, accidents, or spills will cause adverse health and welfare effects.*

Issue 29: *Whether the proposed plant will have negative economic impacts for nearby landowners.*

2. Suzanne Johnson

The Executive Director reviewed the factors found in 30 TAC § 55.201(c) and (d), and § 55.203 for determining whether a requestor is an affected person, and recommends the Commission find that Suzanne Johnson is an affected person.

Ms. Johnson submitted a hearing request during the 30-day period after the RTC was mailed out by the Commission. The hearing request was in writing, provided the required contact information, and included issues that are the basis of the hearing request. Some of the issues raised in this hearing request were based on timely filed comments. In her hearing request, Ms. Johnson expressed concern that the chemicals proposed to be handled at the plant are hazardous and questioned whether anything could be done to prevent approval of the permit. She expressed particular concern about what she described as a chemical evaporation pond and stated that harmful PFAS chemicals will evaporate into the air from that pond. She is concerned that evaporated chemicals will contaminate her rainwater collection systems and adversely affect her health and that of her neighbors, livestock, and bees. Ms. Johnson stated that because bees cannot differentiate between fresh and contaminated water, honey will be contaminated with PFAS chemicals.

Ms. Johnson stated that she lives 1,000 feet from the proposed plant's evaporation pond with her husband and their dog. Based on the address provided, the Executive Director determined the Johnsons reside approximately 0.1 miles from the proposed plant. For air authorizations, distance from the proposed plant is particularly relevant to the issue of whether there is a likely impact of the regulated activity on a person's interests because of the dispersion and effects of individual air contaminants emitted from a facility. The natural resource that is the subject of this permit is the ambient air an individual breathes. Based on the location of her property, issues raised, and interests affected by the application, Suzanne Johnson has identified personal justiciable interests not common to members of the general public. Therefore, the Executive Director recommends that the Commission find that Suzanne Johnson is an affected person based on the criteria set out in 30 TAC § 55.203.

In her hearing request, Ms. Johnson raised the following issues that were also raised in her timely comments:

Issue 2: *Whether the proposed plant will negatively affect human health, including sensitive subgroups and physical property.*

Issue 3: *Whether the proposed plant will negatively affect welfare, including plants, animals, and the environment.*

Issue 28: *Whether the proposed plant will violate any deed restrictions.*

In her hearing request, Ms. Johnson raised the following issues that were not raised in her timely comments:

Issue 17: *Whether the proposed location of the plant is suitable for the chemical plant.*

Issue 19: *Whether the proposed plant will negatively affect water quality.*

Issue 29: *Whether the proposed plant will have negative economic impacts for nearby landowners.*

Issue 30: *Whether the Applicant's evaporation pond will contaminate groundwater or evaporate chemicals that will be harmful to human health or negatively affect welfare, including plants, animals, and the environment.*

Issue 31: *Whether the Applicant's evaporation pond will cause mosquito infestations and whether any subsequent mosquito remediation actions will harm honeybees.*

3. Patricia McCormick Mulvihill

The Executive Director reviewed the factors found in 30 TAC § 55.201(c) and (d), and § 55.203 for determining whether a requestor is an affected person, and recommends the Commission find that Patricia McCormick Mulvihill is an affected person.

Mrs. Mulvihill submitted a hearing request during the 30-day period after the RTC was mailed out by the Commission. Some of the issues raised in this hearing request were based on timely filed comments. The hearing request was in writing, provided the required contact information, and included issues that are the basis of the hearing request. The hearing request was in writing, provided the required contact information, and included issues that are the basis of their hearing requests.

In her hearing request, Mrs. Mulvihill detailed some of her preexisting health conditions, stated that she is battling cancer, and is hypersensitive to chemicals in her environment. Mrs. Mulvihill expressed concern about the proposed plant will negatively affect air quality and cause adversely impact her health and safety and that of visitors to her property. Additionally, Mrs. Mulvihill expressed concern that the plant would adversely impact the health and lives of all children and families that move to the area.

Patricia McCormick Mulvihill is a co-trustee for a 31-acre parcel of land that she stated is located 0.65 miles from the location of the proposed plant. She expressed concern that the current and future use of the property will be impacted by a decline in air quality. Mrs. Mulvihill stated that that she, her family, and guests frequently use the property for nature walks, wildlife observation, bird watching, outdoor recreation and exercise, rest and relaxation, and mental health retreats.

Mrs. Mulvihill does not reside on the property but indicated that she plans to build a residence there in the future. She stated that the property has been owned by her family since 1852, is the subject of a 100-year trust for the benefit of her children and grandchildren, and that it is frequently used for outdoor recreation and exercise.

The Executive Director has identified and labeled this property on the attached map as the "McCormick Ranch." Using the address provided and county property records, the Executive Director determined that while the majority of the property is located more than one mile from the location of the proposed plant, small portions of the McCormick Ranch are located within one mile with the closest point being approximately 0.97 miles from the proposed plant. For air authorizations, distance from the proposed plant is particularly relevant to the issue of whether there is a likely impact of the regulated activity on a person's interests because of the dispersion and effects of individual air contaminants emitted from a facility. The natural resource that is the subject of this permit is the ambient air an individual breathes. Based on the location of the McCormick Ranch, issues raised, and interests affected by the application, Patricia McCormick Mulvihill has identified personal justiciable interests not common to members of the general public. Therefore, the Executive Director recommends that the Commission find that Patricia McCormick Mulvihill is an affected person based on the criteria set out in 30 TAC § 55.203.

In her hearing request, Ms. Mulvihill raised the following issues that were also raised in her timely comments:

Issue 1: *Whether the proposed plant will negatively affect air quality.*

Issue 2: *Whether the proposed plant will negatively affect human health, including sensitive subgroups and physical property.*

Issue 3: *Whether the proposed plant will negatively affect welfare, including plants, animals, and the environment.*

Issue 17: *Whether the proposed location of the plant is suitable for the chemical plant.*

In her hearing request, Ms. Mulvihill raised the following issues that were not raised in her timely comments:

Issue 5: *Whether the proposed plant will cause a nuisance or interfere with the use and enjoyment of property.*

4. Shannon White-Shubert

The Executive Director reviewed the factors found in 30 TAC § 55.201(c) and (d), and § 55.203 for determining whether a person is an affected person and recommends the Commission find that Shannon White-Shubert is an affected person.

Shannon White-Shubert submitted a hearing request on behalf of herself and her husband Mike, during the 30-day period after the RTC was mailed out by the Commission. Some of the issues raised in this hearing request were based on timely filed comments. The hearing request was in writing, provided the required contact information, and included issues that are the basis of her hearing requests. In her hearing request, Ms. White-Shubert expressed concern about adverse health effects on herself, her husband, and pets and adverse impacts to trees on their property. She stated she believes there are critical health and environmental concerns associated

with the proposed plant. Mrs. White-Shubert expressed particular concern about the potential for adverse effects on the bees kept on their property and bees being raised by others in the community. She stated that honey will most certainly be contaminated.

Shannon White-Shubert stated that she owns twelve acres of land located 1,086 feet from the proposed plant. Based on the address provided and county property records, the Executive Director determined the closest point of Ms. White-Shubert's property is located approximately 0.33 miles from the proposed plant. For air authorizations, distance from the proposed plant is particularly relevant to the issue of whether there is a likely impact of the regulated activity on a person's interests because of the dispersion and effects of individual air contaminants emitted from a facility. The natural resource that is the subject of this permit is the ambient air an individual breathes.

Mrs. White-Shubert did not state that she and her husband reside on this property and provided the Commission with a mailing address in Round Rock, Texas. In addition, she did not state how much time she spends on the property. However, Mrs. White-Shubert did indicate that her property is used to raise bees.

Based on the location of her property, issues raised, and interests affected by the application, Shannon White-Shubert has identified personal justiciable interests not common to members of the general public. Therefore, the Executive Director recommends that the Commission find that Shannon White-Shubert is an affected person based on the criteria set out in 30 TAC § 55.203.

In her hearing request, Ms. White-Shubert raised the following issues that were also raised in her timely comments:

Issue 2: *Whether the proposed plant will negatively affect human health, including sensitive subgroups and physical property.*

Issue 3: *Whether the proposed plant will negatively affect welfare, including plants, animals, and the environment.*

Issue 5: *Whether the proposed plant will cause a nuisance or interfere with the use and enjoyment of property.*

Issue 17: *Whether the proposed location of the plant is suitable for the chemical plant.*

Issue 18: *Whether the plant will be subject to less stringent regulations because of its proposed rural location.*

Issue 21: *Whether there are adequate power utilities available to serve the proposed plant.*

Issue 22: *Whether there is adequate infrastructure to support the proposed plant in an emergency situation, including police, fire department, emergency response teams, and nearby trauma centers.*

Issue 23: *Whether potential emissions events, accidents, or spills will cause adverse health and welfare effects.*

Issue 30: Whether the Applicant's evaporation pond will contaminate groundwater or evaporate chemicals that will be harmful to human health or negatively affect welfare, including plants, animals, and the environment.

In her hearing request, Ms. White-Shubert raised the following issue that was not raised in her timely comments:

Issue 12: Whether the proposed operating hours of the plant ensure that there will be no adverse impacts to human health, welfare, and the environment.

B. Persons the Executive Director Recommends the Commission Refer to SOAH for an Affectedness Determination

1. Brittany D. Varner

The Executive Director reviewed the factors found in 30 TAC § 55.201(c) and (d), and § 55.203 for determining whether a person is an affected person and recommends the Commission refer Brittany D. Varner to SOAH for an affectedness determination.

Mrs. Varner submitted a request for a contested case hearing during the comment period. The hearing request was in writing, provided the required contact information, and included issues that are the basis of the hearing request. In her hearing request, Mrs. Varner expressed concern about adverse health effects to herself and her family, including her child and elderly parents, farm animals, and future generations. She also expressed particular concern about PFAS chemicals.

Mrs. Varner stated that she owns property 0.4 miles or 2,112 feet from the proposed plant. Based on the address provided and county property records, the Executive Director determined the closest point of Mrs. Varner's property is located approximately 0.37 miles from the proposed plant. For air authorizations, distance from the proposed plant is particularly relevant to the issue of whether there is a likely impact of the regulated activity on a person's interests because of the dispersion and effects of individual air contaminants emitted from a facility. The natural resource that is the subject of this permit is the ambient air an individual breathes.

Mrs. Varner also stated that she and her husband sold their home and bought an RV in order to build a future on the property. While she expressed concern that they will have no choice but to live next to the proposed plant, in her hearing request she did not specifically state they currently reside on the property or state how they currently use their property. Therefore, the Executive Director recommends that the Commission refer Mrs. Varner to SOAH for a determination of whether she is an affected person.

In her hearing request, Mrs. Varner raised the following issues that were also raised in her timely comments:

Issue 2: Whether the proposed plant will negatively affect human health, including sensitive subgroups and physical property.

Issue 3: Whether the proposed plant will negatively affect welfare, including plants, animals, and the environment.

Issue 17: Whether the proposed location of the plant is suitable for the chemical plant.

Issue 19: Whether the proposed plant will negatively affect water quality.

Issue 33: *Whether the proposed plant will increase future industrial development in the area.*

In her hearing request, Mrs. Varner raised the following issues that were not raised in her timely comments:

Issue 20: *Whether the proposed plant will negatively impact water supply or water availability.*

Issue 21: *Whether there are adequate power utilities available to serve the proposed plant.*

Issue 22: *Whether there is adequate infrastructure to support the proposed plant in an emergency situation, including police, fire department, emergency response teams, and nearby trauma centers.*

Issue 23: *Whether potential emissions events, accidents, or spills will cause adverse health and welfare effects.*

Issue 28: *Whether the proposed plant will violate any deed restrictions.*

2. Harold Charles Wardlaw and Peggy Anne McCormick Wardlaw

The Executive Director reviewed the factors found in 30 TAC § 55.201(c) and (d), and § 55.203 for determining whether a requestor is an affected person, and recommends the Commission refer Harold Charles Wardlaw and Peggy Ann McCormick Wardlaw to SOAH for an affectedness determination.

Harold Wardlaw and Peggy Ann McCormick Wardlaw both submitted hearing requests during the 30-day period after the RTC was mailed out by the Commission. Some of the issues raised in their hearing requests were based on timely filed comments. Mr. Wardlaw expressed concern about air and water pollution; he raised these issues in timely comments. Mrs. Wardlaw expressed concern about the predicted exceedance of the ESLs, which was not raised during the comment period. The Wardlaws both expressed concern about adverse health impacts; Mr. Wardlaw raised this concern in timely comments but Mrs. Wardlaw did not. In addition, the Wardlaws both expressed concern that deer and wild turkey hunted on their property will be contaminated; these concerns were not raised during the comment period.

The Wardlaws both indicated they own an interest in the McCormick Ranch and provided the address for the property. The Wardlaws also both stated they own property "across CR 306" but did not provide any information about that property. Mrs. Wardlaw's hearing request stated they enjoy spending time outdoors at the ranch and that their grandchildren play outside on the grass. However, the Wardlaws reside in San Antonio and neither hearing request indicated how much time they spend on the property. Given their interest in the McCormick Ranch and the issues raised, the Executive Director recommends that the Commission refer the Wardlaws to SOAH for a determination of whether they are affected persons.

In his hearing request, Mr. Wardlaw raised the following issues that were also raised in his timely comments:

Issue 1: *Whether the proposed plant will negatively affect air quality.*

Issue 2: *Whether the proposed plant will negatively affect human health, including sensitive subgroups and physical property.*

Issue 3: *Whether the proposed plant will negatively affect welfare, including plants, animals, and the environment.*

Issue 17: *Whether the proposed location of the plant is suitable for the chemical plant.*

Issue 19: *Whether the proposed plant will negatively affect water quality.*

In his hearing request, Mr. Wardlaw raised the following issues that were not raised in his timely comments:

Issue 8: *Whether the air dispersion modeling properly evaluated emissions from the proposed plant, included all applicable emission sources.*

Issue 23: *Whether potential emissions events, accidents, or spills will cause adverse health and welfare effects.*

In her hearing request, Mrs. Wardlaw raised the following issues that were also raised in her timely comments:

Issue 23: *Whether potential emissions events, accidents, or spills will cause adverse health and welfare effects.*

Issue 25: *Whether the storage and potential transportation of chemicals stored in sealed drums was adequately considered.*

In her hearing request, Mrs. Wardlaw raised the following issues that were not raised in her timely comments:

Issue 2: *Whether the proposed plant will negatively affect human health, including sensitive subgroups and physical property.*

Issue 3: *Whether the proposed plant will negatively affect welfare, including plants, animals, and the environment.*

C. Persons the Executive Director Recommends the Commission Find are NOT Affected Persons

a. Individuals that did not meet the requirements of 30 TAC § 55.201: Nicole Elizabeth Bauer, Charles Ely McCormick, Erin McCormick, Joyce McCormick, Nickolas McCormick

These individuals submitted a timely request for a contested case hearing during the 30-day period after the RTC was mailed out by the Commission. However, these individuals did not submit any timely comments during the public comment period. For applications submitted after September 1, 2015, a hearing request must be based only on the requestor's timely filed comments. Because the requesters did not submit any timely filed comments, the Executive Director recommends that they are not affected persons because they did not meet the criteria set out in 30 TAC § 55.201.

b. Individuals that did not meet the requirements of 30 TAC § 55.203

1. Ann and Thomas Beville

The Executive Director reviewed the factors found in 30 TAC § 55.201(c) and (d), and § 55.203 for determining whether a requestor is an affected person, and recommends the Commission find that Ann and Thomas Beville are not affected persons.

Mr. and Mrs. Beville submitted a hearing request during the 30-day period after the RTC was mailed out by the Commission. The hearing request was in writing and provided the required contact information. Ann Beville submitted a timely comment during the comment period but Thomas Beville did not submit timely comments. The issues raised in their hearing request were not raised in a timely comment. Their hearing request expressed concern about adverse health effects on themselves, their family, pets and beehives. In addition, the Bevilles are concerned that water runoff from the proposed plant could impact water quality.

The Bevilles did not indicate where they live in relation to the proposed plant. Using the address provided, the Executive Director determined that they live approximately 10.36 miles from the proposed plant. For air authorizations, distance from the proposed plant is particularly relevant to the issue of whether there is a likely impact of the regulated activity on a person's interests because of the dispersion and effects of individual air contaminants emitted from a facility. The natural resource that is the subject of this permit is the ambient air an individual breathes. Based on their location relative to the proposed plant, the Executive Director does not expect the regulated activity to have an impact on their health in a way that is not common to members of the general public. Accordingly, the Executive Director recommends that the Commission find that Ann and Thomas Beville are not affected persons based on the criteria set out in 30 TAC § 55.203.

In their hearing request, Mr. and Mrs. Beville raised the following issue that was also raised in Ann Beville's timely comments:

Issue 19: *Whether the proposed plant will negatively affect water quality.*

In their hearing request, Mr. and Mrs. Beville raised the following issues that were not raised in Ann Beville's timely comments:

Issue 2: *Whether the proposed plant will negatively affect human health, including sensitive subgroups and physical property.*

Issue 3: *Whether the proposed plant will negatively affect welfare, including plants, animals, and the environment.*

2. Sheryl Marie Farley

The Executive Director reviewed the factors found in 30 TAC § 55.201(c) and (d), and § 55.203 for determining whether a requestor is an affected person, and recommends the Commission find that Sheryl Marie Farley is not an affected person.

Ms. Farley submitted a hearing request during the 30-day period after the RTC was mailed out by the Commission. The hearing request was in writing and provided the required contact information. Some of the issues raised in this hearing request were based on timely filed comments. In her hearing request, Ms. Farley expressed concern that air emissions from the proposed plant will reach her property and be harmful to the health of herself and her family and very young children and the elderly.

Ms. Farley did not indicate where she lives relative to the proposed plant. Using the address provided, the Executive Director determined that she lives approximately 2.41 miles from the proposed plant. For air authorizations, distance from the proposed plant is particularly relevant to the issue of whether there is a likely impact of the regulated activity on a person's interests because of the dispersion and effects of individual air contaminants emitted from a facility. The natural resource that is the subject of this permit is the ambient air an individual breathes. Based on her location relative to the proposed plant, the Executive Director does not expect the regulated activity to have an impact on Ms. Farley's health in a way that is not common to members of the general public. Accordingly, the Executive Director recommends that the Commission find that Sheryl Marie Farley is not an affected person based on the criteria set out in 30 TAC § 55.203.

In her hearing request, Ms. Farley raised the following issue that was also raised in her timely comments:

Issue 17: *Whether the proposed location of the plant is suitable for the chemical plant.*

In her hearing request, Ms. Farley raised the following issues that were not raised in her timely comments:

Issue 2: *Whether the proposed plant will negatively affect human health, including sensitive subgroups and physical property.*

Issue 3: *Whether the proposed plant will negatively affect welfare, including plants, animals, and the environment.*

Issue 19: *Whether the proposed plant will negatively affect water quality.*

Issue 21: *Whether there are adequate power utilities available to serve the proposed plant.*

Issue 22: *Whether there is adequate infrastructure to support the proposed plant in an emergency situation, including police, fire department, emergency response teams, and nearby trauma centers.*

Issue 32: *Whether the proposed plant will negatively impact public safety on surrounding roads.*

3. Kelley Heath

The Executive Director reviewed the factors found in 30 TAC § 55.201(c) and (d), and § 55.203 for determining whether a requestor is an affected person, and recommends the Commission find that Kelley Heath is not an affected person.

Ms. Heath submitted a hearing request during the 30-day period after the RTC was mailed out by the Commission. The hearing request was in writing and provided the required contact information. Some of the issues raised in this hearing request were based on timely filed comments. In her hearing request, Ms. Heath expressed concern about adverse health effects on herself and her family.

Ms. Heath did not state where she resides in relation to the proposed plant but stated they are “too close.” Using the address provided, the Executive Director determined that they she lives approximately 11.97 miles from the proposed plant. For air authorizations, distance from the proposed plant is particularly relevant to the issue of whether there is a likely impact of the regulated activity on a person’s interests because of the dispersion and effects of individual air contaminants emitted from a facility. The natural resource that is the subject of this permit is the ambient air an individual breathes. Based on her location relative to the proposed plant, the Executive Director does not expect the regulated activity to have an impact on Ms. Heath’s health in a way that is not common to members of the general public. Accordingly, the Executive Director recommends that the Commission find that Kelley Heath is not an affected person based on the criteria set out in 30 TAC § 55.203.

In her hearing request, Ms. Heath raised the following issues that were also raised in her timely comments:

Issue 2: Whether the proposed plant will negatively affect human health, including sensitive subgroups and physical property.

Issue 17: Whether the proposed location of the plant is suitable for the chemical plant.

In her hearing request, Ms. Heath raised the following issues that were not raised in her timely comments:

Issue 3: Whether the proposed plant will negatively affect welfare, including plants, animals, and the environment.

Issue 19: Whether the proposed plant will negatively affect water quality.

4. Catherine Johnston

The Executive Director reviewed the factors found in 30 TAC § 55.201(c) and (d), and § 55.203 for determining whether a requestor is an affected person, and recommends the Commission find that Catherine Johnston is not an affected person.

Ms. Johnston submitted a hearing request during the 30-day period after the RTC was mailed out by the Commission. The hearing request was in writing and she provided the required contact information. In her hearing request Ms. Johnston stated, “I would like to request a contested case hearing” and attached the letter from Dr. Neil Carman that was referenced in the response to the requests for reconsideration above. However, Ms. Johnston did not state how or why she specifically will be affected in a manner not common to members of the general public.

Ms. Johnston did not state where she resides in relation to the proposed plant. Using the address provided, the Executive Director determined that they she lives approximately 3.81 miles from the proposed plant. For air authorizations, distance from the proposed plant is particularly relevant to the issue of whether there is a likely impact of the regulated activity on a person’s interests because of the dispersion and

effects of individual air contaminants emitted from a facility. The natural resource that is the subject of this permit is the ambient air an individual breathes. Because she failed to state a personal justiciable interest in her hearing request and because she resides over three miles from the location of the proposed plant, the Executive Director recommends that the Commission find that Catherine Johnston is not an affected person based on the criteria set out in 30 TAC § 55.203.

5. Charles McCormick

The Executive Director reviewed the factors found in 30 TAC § 55.201(c) and (d), and § 55.203 for determining whether a requestor is an affected person, and recommends the Commission find that Charles McCormick is not an affected person.

Mr. McCormick submitted a hearing request during the 30-day period after the RTC was mailed out by the Commission. The hearing request was in writing and provided the required contact information. Some of the issues raised in his hearing request were based on timely filed comments. In his hearing request, Mr. McCormick expressed concern about the monitoring requirements of the draft permit. He stated that the Applicant should be required to install an exhaust monitoring system that measures and records emissions in real time and includes threshold alarms that trigger sirens and alert emergency services to notify residents of a potential need to evacuate. Mr. McCormick expressed concern that without such a system, the Applicant could be tempted to alter its records that would otherwise show noncompliance with the permit. However, Mr. McCormick did not state how or why he specifically will be affected in a manner not common to members of the general public.

In his hearing request, Mr. McCormick stated he owns 30 acres 0.6 miles away “on CR236” but did not provide an address or any additional information about his property. As a result, the Executive Director is unable identify where this property is located. He did not indicate how much time he spends on the property on which his hearing request is based or state how the property is used. In addition, Mr. McCormick provided a mailing address in Round Rock, Texas. For air authorizations, distance from the proposed plant is particularly relevant to the issue of whether there is a likely impact of the regulated activity on a person’s interests because of the dispersion and effects of individual air contaminants emitted from a facility. The natural resource that is the subject of this permit is the ambient air an individual breathes. Because he failed to state a personal justiciable interest in his hearing request and because he did not provide information about his property, the Executive Director recommends that the Commission find that Charles McCormick is not an affected person based on the criteria set out in 30 TAC § 55.203.

In his hearing request, Mr. McCormick raised the following issue that was also raised in his timely comments:

Issue 11: Whether the draft permit contains adequate monitoring and recordkeeping requirements to assure compliance with all applicable rules and requirements.

6. Henry N. Mulvihill

The Executive Director reviewed the factors found in 30 TAC § 55.201(c) and (d), and § 55.203 for determining whether a requestor is an affected person, and recommends the Commission find that Henry N. Mulvihill is not an affected person.

Mr. Mulvihill submitted a request for a contest case hearing during the public comment period. The hearing request was in writing, provided the required contact information, and included issues that are the basis of the hearing request. In his hearing request, Henry Mulvihill expressed concern with the location of the proposed plant and, in reference to a statement made by the Applicant concerning its choice of location, stated that he was not a buffer.

Henry Mulvihill did not provide a residential address or indicate where he lives relative to the proposed plant. 30 TAC § 55.201(d)(2) provides that requests for contested case hearing must include “the requestor’s location and distance relative to the proposed facility or activity that is the subject of the application...” Therefore, Mr. Mulvihill did not comply with the requirements of 30 TAC § 55.201(d)(2).

In addition, in his hearing request Mr. Mulvihill expressed concern about the location of the proposed plant and indicated that he owned land near the proposed location. However, the hearing request did not describe any likely impact of the regulated activity on Mr. Mulvihill’s health and safety or on the use of his property. Because he failed to state a personal justiciable interest in his hearing request, the Executive Director recommends that the Commission find that Henry N. Mulvihill is not an affected person based on the criteria set out in 30 TAC § 55.203.

In his hearing request, Mr. Mulvihill raised the following issue that was also raised in his timely comments:

Issue 17: Whether the proposed location of the plant is suitable for the chemical plant.

7. Joe J. Pacheco

The Executive Director reviewed the factors found in 30 TAC § 55.201(c) and (d), and § 55.203 for determining whether a requestor is an affected person, and recommends the Commission find that Joe J. Pacheco is not an affected person.

Mr. Pacheco submitted a hearing request during the 30-day period after the RTC was mailed out by the Commission. The hearing request was in writing and provided the required contact information. Some of the issues raised in his hearing request were based on timely filed comments. In his hearing request, Mr. Pacheco expressed concern about adverse health effects on himself and his family and expressed concern that emissions will contaminate the land and local waterways and negatively impact groundwater.

Mr. Pacheco did not state where he resides in relation to the proposed plant. Using the address provided, the Executive Director determined that he lives approximately 11.97 miles from the proposed plant. For air authorizations, distance from the proposed plant is particularly relevant to the issue of whether there is a likely impact of the regulated activity on a person’s interests because of the dispersion and effects of individual air contaminants emitted from a facility. The natural resource that is the subject of this permit is the ambient air an individual breathes. Based on his location relative to the proposed plant, the Executive Director does not expect the regulated activity to have an impact on Mr. Pacheco’s health in a way that is not common to members of the general public. Accordingly, the Executive Director recommends that the Commission find that Joe J. Pacheco is not an affected person based on the criteria set out in 30 TAC § 55.203.

In his hearing request, Mr. Pacheco raised the following issues that were also raised in his timely comments:

Issue 2: *Whether the proposed plant will negatively affect human health, including sensitive subgroups and physical property.*

Issue 3: *Whether the proposed plant will negatively affect welfare, including plants, animals, and the environment.*

Issue 19: *Whether the proposed plant will negatively affect water quality.*

8. Chris and Renee Peyton

The Executive Director reviewed the factors found in 30 TAC § 55.201(c) and (d), and § 55.203 for determining whether a requestor is an affected person, and recommends the Commission find that Chris and Renee Peyton are not affected persons.

Mr. and Mrs. Peyton each submitted a hearing request during the 30-day period after the RTC was mailed out by the Commission. The hearing requests were in writing and provided the required contact information. Some of the issues raised in their hearing requests were based on timely filed comments. In their hearing requests, the Peytons expressed concern that the Applicant was planning on dumping wastewater into the San Gabriel River. In addition, the Peytons both expressed concern about adverse health effects on themselves and their family and expressed concern that emissions will contaminate the land and local waterways and negatively impact groundwater. They both stated they have young children who enjoy playing outside and elderly family members who enjoy sitting outside and watching birds and other wildlife.

Mr. and Mrs. Peyton both stated their property is approximately 14 miles from the proposed plant. Using the address provided, the Executive Director determined that they live approximately 9.39 miles from the proposed plant. For air authorizations, distance from the proposed plant is particularly relevant to the issue of whether there is a likely impact of the regulated activity on a person's interests because of the dispersion and effects of individual air contaminants emitted from a facility. The natural resource that is the subject of this permit is the ambient air an individual breathes. Based on their location relative to the proposed plant, the Executive Director does not expect the regulated activity to have an impact on their health in a way that is not common to members of the general public. Accordingly, the Executive Director recommends that the Commission find that Chris and Renee Peyton are not affected persons based on the criteria set out in 30 TAC § 55.203.

In their hearing request, Mr. and Mrs. Peyton raised the following issues that were also raised in their timely comments:

Issue 2: *Whether the proposed plant will negatively affect human health, including sensitive subgroups and physical property.*

Issue 3: *Whether the proposed plant will negatively affect welfare, including plants, animals, and the environment.*

Issue 19: *Whether the proposed plant will negatively affect water quality.*

9. Sandra Lee Thurman

The Executive Director reviewed the factors found in 30 TAC § 55.201(c) and (d), and § 55.203 for determining whether a requestor is an affected person, and recommends the Commission find that Sandra Lee Thurman is not an affected person.

Ms. Thurman submitted a hearing request during the 30-day period after the RTC was mailed out by the Commission. The hearing request was in writing and provided the required contact information. In her hearing request, Ms. Thurman questioned whether the Commission could guarantee that neither she nor anyone else in the community would experience adverse health effects. In timely comments, Ms. Thurman expressed concern about emissions events or leaks of chemical products and about potential water contamination. Thus, the concern about adverse health effects was not raised in a timely comment.

Ms. Thurman stated she and her husband live 0.28 miles from the proposed plant. Using the address provided, the Executive Director determined that they she lives approximately 0.63 miles from the proposed plant. For applications submitted after September 1, 2015, a hearing request must be based only on the requestor's timely filed comments. Because she did not raise health concerns in a timely filed comment, the Executive Director recommends that the Commission find that Sandra Lee Thurman is not an affected person based on the criteria set out in 30 TAC § 55.203.

In her hearing request, Ms. Thurman raised the following issues that were not raised in her timely comments:

Issue 1: Whether the proposed plant will negatively affect air quality.

Issue 2: Whether the proposed plant will negatively affect human health, including sensitive subgroups and physical property.

Issue 3: Whether the proposed plant will negatively affect welfare, including plants, animals, and the environment.

10. Haziell McCormick Williams

The Executive Director reviewed the factors found in 30 TAC § 55.201(c) and (d), and § 55.203 for determining whether a requestor is an affected person, and recommends the Commission find that Haziell McCormick Williams is not an affected person.

Mrs. Williams submitted a hearing request during the 30-day period after the RTC was mailed out by the Commission. The hearing request was in writing and provided the required contact information. In her hearing request, Ms. Williams stated that she is an affected person because of her proximity to the proposed plant and her hypersensitivity to chemicals in her environment. She stated she suffers from idiopathic anaphylaxis which can be triggered by insignificant levels of chemicals. In timely comments, Ms. Williams expressed concern about the proposed location of the plant and referred to an incident that occurred at the Applicant's other plant. The concern about adverse health effects was not raised in a timely comment and thus, the issues in her hearing request were not based on timely filed comments.

Mrs. Williams stated she owns two tracts of land within one mile of the proposed plant and provided a map of the two properties. Using the information provided, the Executive Director determined that the closest point on Ms. Williams' property is located approximately 0.71 miles from the proposed plant. Mrs. Williams stated she is a Licensed Professional Therapist and that she plans to have a Children's Equine

Therapy counseling practice on her land to work with children who have respiratory and hyperallergic health conditions triggered by chemical emissions. However, Mrs. Williams resides in San Antonio and did not indicate how much time she spends on the property on which her hearing request is based or state how the property is currently used. For applications submitted after September 1, 2015, a hearing request must be based only on the requestor's timely filed comments. Because she did not raise health concerns in a timely filed comment, the Executive Director recommends that the Commission find that Haziell McCormick Williams is not an affected person based on the criteria set out in 30 TAC § 55.203.

In her hearing request, Mrs. Williams raised the following issues that were also raised in her timely comments:

Issue 3: *Whether the proposed plant will negatively affect welfare, including plants, animals, and the environment.*

Issue 17: *Whether the proposed location of the plant is suitable for the chemical plant.*

Issue 19: *Whether the proposed plant will negatively affect water quality.*

In her hearing request, Mrs. Williams raised the following issues that were not raised in her timely comments:

Issue 1: *Whether the proposed plant will negatively affect air quality.*

Issue 2: *Whether the proposed plant will negatively affect human health, including sensitive subgroups and physical property.*

Issue 5: *Whether the proposed plant will cause a nuisance or interfere with the use and enjoyment of property.*

Issue 14: *Whether the Applicant's compliance history warrants changes to the draft permit.*

Issue 18: *Whether the plant will be subject to less stringent regulations because of its proposed rural location.*

Issue 23: *Whether potential emissions events, accidents, or spills will cause adverse health and welfare effects.*

D. Groups and Associations

In addition to the requirements in 30 TAC § 55.201 and 30 TAC § 55.203, requests for a contested case hearing by a group or association on an application filed on or after September 1, 2015, must meet the requirements in 30 TAC § 55.205(b). Specifically: (1) the group or association must have submitted timely comments on the application; (2) the request must identify, by name and physical address, one or more members of the group or association that would otherwise have standing to request a hearing in their own right; (3) the interests the group or association seeks to protect must be germane to the organization's purpose; and (4) the claim asserted or the relief requested may not require the participation of the individual members in the case.

I. North San Gabriel Alliance

(1) Whether the group or association submitted timely comments on the application.

The North San Gabriel Alliance submitted multiple timely comments and requests for a contested case hearing on the application. The Executive Director has determined that North San Gabriel Alliance meets this requirement for associational standing.

(2) Whether one or more members of the group or association would otherwise have standing to request a hearing in their own right.

The North San Gabriel Alliance identified several members it argued would have standing to request a hearing in their own right, including Elizabeth Ann Friou, Patricia McCormick Mulvihill, Bryce Philip McCormick, Charles Ray Williams, Jr., Haziel McCormick Williams, and Margaret 'Peggy' Ann McCormick Wardlaw. As discussed above, the Executive Director recommends that Elizabeth Ann Friou and Patricia McCormick Mulvihill have standing to request a hearing in their own right.

Accordingly, the Executive Director has determined North San Gabriel Alliance meets this requirement for associational standing without the need to evaluate whether the remaining members identified by North San Gabriel Alliance would have standing in their own right.

(3) Whether the interests the group or association seeks to protect are germane to the organization's purpose.

According to their hearing requests, North San Gabriel Alliance is a non-profit organization that works to protect the natural environment, homes, crops, animals, and property of people who live, work, farm, ranch, and recreate in the area of the North Fork of the San Gabriel River. North San Gabriel Alliance stated that it is protesting the issuance of the permit to protect against an increase in air emissions and risks of accidents and spills that could lead to surface and groundwater contamination, which it argues is germane to its purpose as a local conservation and stewardship organization. Thus, the Executive Director has determined that North San Gabriel Alliance has met this requirement for associational standing.

(4) Whether the claim asserted or the relief requested requires the participation of the individual members in the case.

The relief requested by North San Gabriel Alliance does not require the participation of any individual member of North San Gabriel Alliance. Thus, the Executive Director has determined that North San Gabriel Alliance has met this requirement for associational standing.

Because the North San Gabriel Alliance met all four requirements for associational standing, the Executive Director recommends the Commission find the North San Gabriel Alliance is an affected person.

In its hearing requests, North San Gabriel Alliance raised the following issues that were also raised in its timely comments:

Issue 2: *Whether the proposed plant will negatively affect human health, including sensitive subgroups and physical property.*

Issue 3: *Whether the proposed plant will negatively affect welfare, including plants, animals, and the environment.*

Issue 4: *Whether cumulative and aggregate impacts were adequately considered.*

Issue 7: *Whether the emissions from the proposed facilities were appropriately calculated.*

Issue 8: *Whether the air dispersion modeling properly evaluated emissions from the proposed plant, included all applicable emission sources.*

Issue 9: *Whether the air dispersion modeling was representative of the proposed location and adequately evaluated potential impacts to nearby receptors, including residences and ranches.*

Issue 10: *Whether the draft permit requires the use of the best available control technology (BACT).*

Issue 11: *Whether the draft permit contains adequate monitoring and recordkeeping requirements to assure compliance with all applicable rules and requirements.*

Issue 12: *Whether the proposed operating hours of the plant ensure that there will be no adverse impacts to human health, welfare, and the environment.*

Issue 13: *Whether the draft permit should prohibit chemical flexibility.*

Issue 14: *Whether the Applicant's compliance history warrants changes to the draft permit.*

Issue 15: *Whether the condition in the draft permit requiring the submission of a risk management plan prior to exceeding a threshold quantity of hydrogen fluoride is adequate.*

Issue 16: *Whether the proposed plant will adversely impact endangered species.*

Issue 17: *Whether the proposed location of the plant is suitable for the chemical plant.*

Issue 23: *Whether potential emissions events, accidents, or spills will cause adverse health and welfare effects.*

Issue 24: *Whether an emergency fire water pump should have been included in the application.*

Issue 26: *Whether the application should have included a site review that included information about limestone features on nearby properties that could serve as conduits to the Edwards Aquifer or habitat for endangered species, and plants and animals being raised near the proposed location of the plant.*

Issue 27: *Whether the application should have included an Edwards Aquifer Contributing Zone Plan.*

VIII. Whether Issues Raised are Referable to SOAH for a Contested Case Hearing

The Executive Director has analyzed issues raised in accordance with the regulatory criteria. The issues discussed were raised during the public comment period and addressed in the RTC. None of the issues were withdrawn. For applications submitted on or after September 1, 2015, only those issues raised in a timely comment by a requester whose request is granted may be referred.³ The issues raised for this application and the Executive Director's analysis and recommendations follow.

Issue 1: *Whether the proposed plant will negatively affect air quality.*

This issue involves a disputed question of fact, and was not withdrawn, and is relevant and material to the issuance of the draft permit. The issue was raised by Elizabeth Ann Friou, Patricia McCormick Mulvihill, and the North San Gabriel Alliance who the Executive Director recommends the Commission find are affected persons.

The Executive Director recommends referring this issue to SOAH.

Issue 2: *Whether the proposed plant will negatively affect human health, including sensitive subgroups and physical property.*

This issue involves a disputed question of fact, and was not withdrawn, and is relevant and material to the issuance of the draft permit. The issue was raised by Elizabeth Ann Friou, Suzanne Johnson, Patricia McCormick Mulvihill, Shannon White-Shubert, and the North San Gabriel Alliance who the Executive Director recommends the Commission find are affected persons.

The Executive Director recommends referring this issue to SOAH.

Issue 3: *Whether the proposed plant will negatively affect welfare, including plants, animals, and the environment.*

This issue involves a disputed question of fact, and was not withdrawn, and is relevant and material to the issuance of the draft permit. The issue was raised by Elizabeth Ann Friou, Suzanne Johnson, Patricia McCormick Mulvihill, Shannon White-Shubert, and the North San Gabriel Alliance who the Executive Director recommends the Commission find are affected persons.

The Executive Director recommends referring this issue to SOAH.

Issue 4: *Whether cumulative and aggregate impacts were adequately considered.*

This issue involves a disputed question of fact, and was not withdrawn, and is relevant and material to the issuance of the draft permit. The issue was raised by the North San Gabriel Alliance who the Executive Director recommends the Commission find is an affected person.

The Executive Director recommends referring this issue to SOAH.

³ TEX. GOVT. CODE § 2003.047(e-1); 30 TAC § 55.211 (c)(2)(A)(ii).

Issue 5: Whether the proposed plant will cause a nuisance or interfere with the use and enjoyment of property.

This issue involves a disputed question of fact, and was not withdrawn, and is relevant and material to the issuance of the draft permit. The issue was raised by Elizabeth Ann Friou, and Shannon White-Shubert who the Executive Director recommends the Commission find are affected persons.

The Executive Director recommends referring this issue to SOAH.

Issue 6: Whether the application contains factually incorrect or omitted information.

This issue involves a disputed question of fact, and was not withdrawn, however, the requesters only provided a general statement that errors or omissions existed in the permit application. Because of the generalized nature of the issue, the Executive Director recommends not referring this issue to SOAH.

Issue 7: Whether the emissions from the proposed facilities were appropriately calculated.

This issue involves a disputed question of fact, and was not withdrawn, and is relevant and material to the issuance of the draft permit. The issue was raised by the North San Gabriel Alliance who the Executive Director recommends the Commission find is an affected person.

The Executive Director recommends referring this issue to SOAH.

Issue 8: Whether the air dispersion modeling properly evaluated emissions from the proposed plant, included all applicable emission sources.

This issue involves a disputed question of fact, and was not withdrawn, and is relevant and material to the issuance of the draft permit. The issue was raised by the North San Gabriel Alliance who the Executive Director recommends the Commission find is an affected person.

The Executive Director recommends referring this issue to SOAH.

Issue 9: Whether the air dispersion modeling was representative of the proposed location and adequately evaluated potential impacts to nearby receptors, including residences and ranches.

This issue involves a disputed question of fact, and was not withdrawn, and is relevant and material to the issuance of the draft permit. The issue was raised by Elizabeth Ann Friou and the North San Gabriel Alliance who the Executive Director recommends the Commission find are affected persons.

The Executive Director recommends referring this issue to SOAH.

Issue 10: *Whether the draft permit requires the use of the best available control technology (BACT).*

This issue involves a disputed question of fact, and was not withdrawn, and is relevant and material to the issuance of the draft permit. The issue was raised by the North San Gabriel Alliance who the Executive Director recommends the Commission find is an affected person.

The Executive Director recommends referring this issue to SOAH.

Issue 11: *Whether the draft permit contains adequate monitoring and recordkeeping requirements to assure compliance with all applicable rules and requirements.*

This issue involves a disputed question of fact, and was not withdrawn, and is relevant and material to the issuance of the draft permit. The issue was raised by Elizabeth Ann Friou and the North San Gabriel Alliance who the Executive Director recommends the Commission find are affected persons.

The Executive Director recommends referring this issue to SOAH.

Issue 12: *Whether the proposed operating hours of the plant ensure that there will be no adverse impacts to human health, welfare, and the environment.*

This issue involves a disputed question of fact, and was not withdrawn, and is relevant and material to the issuance of the draft permit. The issue was raised by Elizabeth Ann Friou, and the North San Gabriel Alliance who the Executive Director recommends the Commission find are affected persons.

The Executive Director recommends referring this issue to SOAH.

Issue 13: *Whether the draft permit should prohibit chemical flexibility.*

This issue involves a disputed question of fact, and was not withdrawn, and is relevant and material to the issuance of the draft permit. The issue was raised by the North San Gabriel Alliance who the Executive Director recommends the Commission find is an affected person.

The Executive Director recommends referring this issue to SOAH.

Issue 14: *Whether the Applicant's compliance history warrants changes to the draft permit.*

This issue involves a disputed question of fact, and was not withdrawn, and is relevant and material to the issuance of the draft permit. The issue was raised by Elizabeth Ann Friou and the North San Gabriel Alliance who the Executive Director recommends the Commission find are affected persons.

The Executive Director recommends referring this issue to SOAH.

Issue 15: *Whether the condition in the draft permit requiring the submission of a risk management plan prior to exceeding a threshold quantity of hydrogen fluoride is adequate.*

This issue involves a mixed question of fact and law, and was not withdrawn, and is relevant and material to the issuance of the draft permit. The issue was raised by Elizabeth Ann Friou and the North San Gabriel Alliance who the Executive Director recommends the Commission find are affected persons.

The Executive Director recommends referring this issue to SOAH.

Issue 16: *Whether the proposed plant will adversely impact endangered species.*

This issue involves a disputed question of fact and was not withdrawn. However, because the TCEQ does not have jurisdiction over endangered species, it is not relevant and material to the issuance of the draft permit. The Executive Director recommends the Commission not refer this issue to SOAH.

Issue 17: *Whether the proposed location of the plant is suitable for the chemical plant.*

This issue involves a disputed question of fact, and was not withdrawn, however, it is not relevant and material to the issuance of the draft permit. Except under limited circumstances, which do not exist under this particular permit application, the issuance of a permit cannot be denied on the basis of plant location. The Executive Director recommends the Commission not refer this issue to SOAH.

Issue 18: *Whether the plant will be subject to less stringent regulations because of its proposed rural location.*

This issue involves a question of law which is not relevant and material to the Commission's decision on the application. TCAA § 382.0518 provides that for plants located in areas in attainment of the NAAQS, such as Williamson County, they must utilize controls that meet Best Available Control Technology (BACT) and there must be no indication that emissions from the plant will contravene the intent of the TCAA, including protection of the public's health and physical property. Accordingly, outside of the context of a nonattainment area, the applicable regulations are not determined by the location of the proposed facility. TCEQ's rules provide that only disputed issues of fact or mixed questions of fact and law may be referred to SOAH. 30 TAC § 50.115(c). The Executive Director recommends the Commission not refer this issue to SOAH.

Issue 19: *Whether the proposed plant will negatively affect water quality.*

This issue involves a disputed question of fact, and was not withdrawn, however, it is not relevant and material to the issuance of the draft permit. While the TCEQ is responsible for the environmental protection of all media, including water, the TCAA specifically addresses air-related issues. This permit, if issued, would regulate the control and abatement of air emissions only, and therefore, issues regarding water quality are not within the scope of this permit review. The Executive Director recommends the Commission not refer this issue to SOAH.

Issue 20: *Whether the proposed plant will negatively impact water supply or water availability.*

This issue involves a disputed question of fact, and was not withdrawn, however, it is not relevant and material to the issuance of the draft permit. While the TCEQ is responsible for the environmental protection of all media, including water, the TCAA specifically addresses air-related issues. This permit, if issued, would regulate the control and abatement of air emissions only, and therefore, issues regarding water use or water availability are not within the scope of this permit review. The Executive Director recommends the Commission not refer this issue to SOAH.

Issue 21: *Whether there are adequate power utilities available to serve the proposed plant.*

This issue involves a disputed question of fact, and was not withdrawn, however, it is not relevant and material to the issuance of the draft permit. The TCEQ's jurisdiction is limited to the issues set forth in statute. Accordingly, the TCEQ does not have the authority to consider whether there are adequate utilities available to serve the proposed plant. It is an applicant's responsibility to ensure it has adequate utilities to serve its needs. The Executive Director recommends the Commission not refer this issue to SOAH.

Issue 22: *Whether there is adequate infrastructure to support the proposed plant in an emergency situation, including police, fire department, emergency response teams, and nearby trauma centers.*

This issue involves a disputed question of fact, and was not withdrawn, however, it is not relevant and material to the issuance of the draft permit. The TCEQ's jurisdiction is limited to the issues set forth in statute. Accordingly, the TCEQ does not have the authority to consider whether there is adequate infrastructure to support the proposed plant. The Executive Director recommends the Commission not refer this issue to SOAH.

Issue 23: *Whether potential emissions events, accidents, or spills will cause adverse health and welfare effects.*

This issue involves a disputed question of fact, and was not withdrawn, however, it is not relevant and material to the issuance of the draft permit. The draft permit's Maximum Allowable Emission Rate Table (MAERT) lists the only emissions authorized to be emitted from the proposed plant. Emissions events, accidents, or spills are not authorized. The Executive Director recommends the Commission not refer this issue to SOAH.

Issue 24: *Whether an emergency fire water pump should have been included in the application.*

This issue involves a disputed question of fact, and was not withdrawn, however, it is not relevant and material to the issuance of the draft permit. The TCEQ does not have jurisdiction over emergency response plans. The Executive Director recommends the Commission not refer this issue to SOAH.

Issue 25: *Whether the storage and potential transportation of chemicals stored in sealed drums was adequately considered.*

This issue involves a mixed question of fact and law, and was not withdrawn, however, it is not relevant and material to the issuance of the draft permit. Under the TCAA, the TCEQ regulates facilities that emit air contaminants. Thus, the storage of chemicals in sealed drums which do not have the potential to emit pollutants into the air are outside the scope of review of an air quality application. The Executive Director recommends the Commission not refer this issue to SOAH.

Issue 26: *Whether the application should have included a site review that included information about limestone features on nearby properties that could serve as conduits to the Edwards Aquifer or habitat for endangered species, and plants and animals being raised near the proposed location of the plant.*

This issue involves a disputed question of fact, and was not withdrawn, however, it is not relevant and material to the issuance of the draft permit. The TCAA establishes the TCEQ's jurisdiction to regulate air emissions in the state of Texas. TCEQ's review of requests for air quality authorizations to emit air contaminants is limited to a review of the best available control technology (BACT) and a health effects review. The Executive Director recommends the Commission not refer this issue to SOAH.

Issue 27: *Whether the application should have included an Edwards Aquifer Contributing Zone Plan.*

This issue involves a disputed question of fact, and was not withdrawn, however, it is not relevant and material to the issuance of the draft permit. While the TCEQ is responsible for the environmental protection of all media, including water, the TCAA specifically addresses air-related issues. This permit, if issued, would regulate the control and abatement of air emissions only, and therefore, issues regarding water use, water quality, water availability, or compliance with any applicable Edwards Aquifer rules are not within the scope of this permit review. The Executive Director recommends not referring this issue to SOAH.

Issue 28: *Whether the proposed plant will violate any deed restrictions.*

This issue involves a disputed question of fact, and was not withdrawn, however, it is not relevant and material to the issuance of the draft permit. The TCEQ does not have jurisdiction to consider or enforce deed restrictions. The Executive Director recommends not referring this issue to SOAH.

Issue 29: *Whether the proposed plant will have negative economic impacts for nearby landowners.*

This issue involves a disputed question of fact, and was not withdrawn, however it is not relevant and material to the issuance of the draft permit. The TCEQ's jurisdiction is limited to the issues set forth in statute. Accordingly, the TCEQ does not have the authority to consider local economic impacts when determining whether to approve or deny a permit. The Executive Director recommends not referring this issue to SOAH.

Issue 30: *Whether the Applicant's evaporation pond will contaminate groundwater or evaporate chemicals that will be harmful to human health or negatively affect welfare, including plants, animals, and the environment.*

This issue involves a disputed question of fact, and was not withdrawn, however it is not relevant and material to the issuance of the draft permit. While the TCEQ is responsible for the environmental protection of all media, including water, the TCAA specifically addresses air-related issues. This permit, if issued, would regulate the control and abatement of air emissions only, and therefore, issues regarding wastewater evaporation are not within the scope of this permit review. The Applicant's evaporation pond is authorized by Wastewater Permit No. WQG100041. This general permit does not authorize land application of wastewater adjacent to water in the state or the discharge of wastewater into water in the state. The Executive Director recommends not referring this issue to SOAH.

Issue 31: *Whether the Applicant's evaporation pond will cause mosquito infestations and whether any subsequent mosquito remediation actions will harm honeybees.*

This issue involves a disputed question of fact, and was not withdrawn, however it is not relevant and material to the issuance of the draft permit. While the TCEQ is responsible for the environmental protection of all media, including water, the TCAA specifically addresses air-related issues. This permit, if issued, would regulate the control and abatement of air emissions only, and therefore, issues regarding wastewater evaporation are not within the scope of this permit review. The Applicant's evaporation pond is authorized by wastewater permit No. WQG100041. This general permit does not authorize land application of wastewater adjacent to water in the state or the discharge of wastewater into water in the state. The Executive Director recommends not referring this issue to SOAH.

Issue 32: *Whether the proposed plant will negatively impact public safety on surrounding roads.*

This issue involves a disputed question of fact, and was not withdrawn, however, it is not relevant and material to the issuance of the draft permit. The TCEQ's jurisdiction is limited to the issues set forth in statute. Accordingly, the TCEQ does not have jurisdiction to consider traffic or road safety when determining whether to approve or deny a permit application. Trucks, and their associated emissions, are considered mobile sources, which are not regulated by the TCEQ. Moreover, the TCEQ is prohibited from regulating roads per TCAA § 382.003(6), which excludes roads from the definition of "facility." The Executive Director recommends not referring this issue to SOAH.

Issue 33: *Whether the proposed plant will increase future industrial development in the area.*

This issue involves a disputed question of fact, and was not withdrawn, however, it is not relevant and material to the issuance of the draft permit. The TCEQ's jurisdiction is limited to the issues set forth in statute. The TCEQ does not have the authority to consider the potential for future development because of a plant's location. The Executive Director recommends not referring this issue to SOAH.

IX. Executive Director's Recommendation

The Executive Director respectfully recommends the following actions by the Commission:

1. The Executive Director recommends that the Commission find that Elizabeth Ann Friou, Suzanne Johnson, Patricia McCormick Mulvihill, Shannon White-Shubert, and the North San Gabriel Alliance are affected persons and grant their hearing requests.
2. The Executive Director recommends the Commission refer Brittany D. Varner, Harold Charles Wardlaw, and Peggy Ann McCormick Wardlaw to SOAH for a determination of whether they are affected persons.
3. The Executive Director recommends the Commission find that the remaining hearing requestors are not affected persons and deny their hearing requests.
4. The Executive Director recommends that the Commission deny the requests for reconsideration.
5. If referred to SOAH, refer the following issues as raised by an affected person as identified by the Executive Director:

Issue 1: *Whether the proposed plant will negatively affect air quality.*

Issue 2: *Whether the proposed plant will negatively affect human health, including sensitive subgroups and physical property.*

Issue 3: *Whether the proposed plant will negatively affect welfare, including plants, animals, and the environment.*

Issue 4: *Whether cumulative and aggregate impacts were adequately considered.*

Issue 5: *Whether the proposed plant will cause a nuisance or interfere with the use and enjoyment of property.*

Issue 7: *Whether the emissions from the proposed facilities were appropriately calculated.*

Issue 8: *Whether the air dispersion modeling properly evaluated emissions from the proposed plant, included all applicable emission sources.*

Issue 9: *Whether the air dispersion modeling was representative of the proposed location and adequately evaluated potential impacts to nearby receptors, including residences and ranches.*

Issue 10: *Whether the draft permit requires the use of the best available control technology (BACT).*

Issue 11: *Whether the draft permit contains adequate monitoring and recordkeeping requirements to assure compliance with all applicable rules and requirements.*

Issue 12: *Whether the proposed operating hours of the plant ensure that there will be no adverse impacts to human health, welfare, and the environment.*

Issue 13: *Whether the draft permit should prohibit chemical flexibility.*

Issue 14: *Whether the Applicant's compliance history warrants changes to the draft permit.*

Issue 15: *Whether the condition in the draft permit requiring the submission of a risk management plan prior to exceeding a threshold quantity of hydrogen fluoride is adequate.*

Respectfully submitted,

Texas Commission on Environmental Quality

Toby Baker, Executive Director

Erin E. Chancellor, Director
Office of Legal Services

Charmaine Backens, Deputy Director
Environmental Law Division



Betsy Peticolas, Staff Attorney
Environmental Law Division
State Bar Number 24070040
(512) 239-6033

Abigail Adkins, Staff Attorney
Environmental Law Division
State Bar Number 24132018
(512) 239-2496
PO Box 13087, MC 173
Austin, Texas 78711-3087

REPRESENTING THE
EXECUTIVE DIRECTOR OF THE
TEXAS COMMISSION ON
ENVIRONMENTAL QUALITY

EXFLUOR RESEARCH CORPORATION
AIR QUALITY PERMIT NO. 165848
MAP A

EXFLUOR RESEARCH CORPORATION Air Quality Permit No. 165848

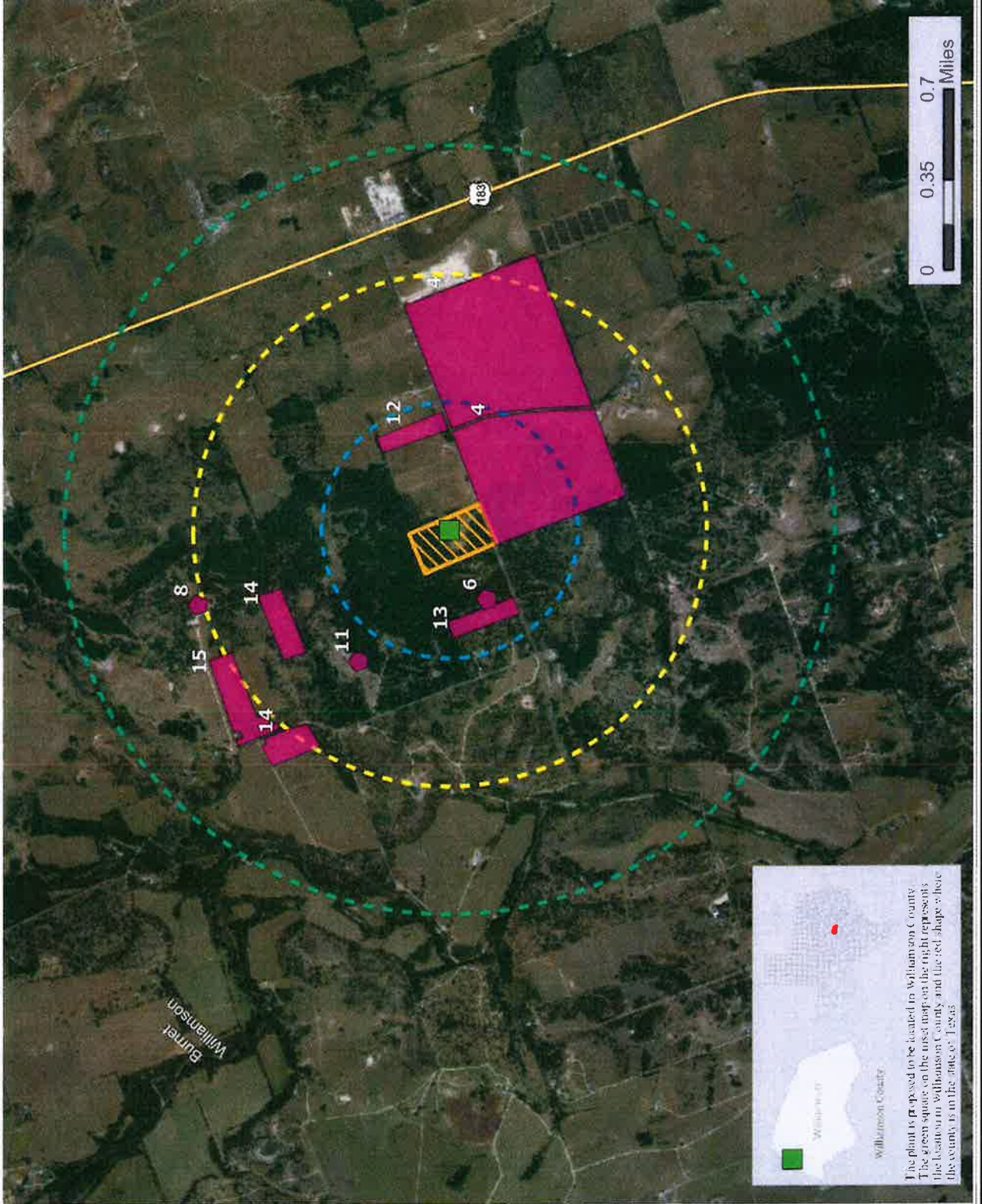
Map Requested by: ICEQ Office of Legal Services
for Commissioners' Agenda



Protecting Texas by
Reducing and
Preventing Pollution

Texas Commission on Environmental Quality
GIS Team (Mail Code 197)
P.O. Box 13087
Austin, Texas 78711-3087
Date: 11/1/2022
CRF 0029610
Cartographic: A.B. Smith

- Plant
- Requestors (residences)
- Requestors (property)
- Property Line
- 0.5 Mile Radius
- 1.0 Mile Radius
- 1.5 Mile Radius
- County Boundary



Please see Appendix A for a list of requestors and distances from the plant.

Source: The location of the facility was provided by the TCEQ Office of Legal Services (OL-5). OL-5 obtained the site location information from the applicant and the requester information from the requester.

This map was generated by the Information Resource Division of the Texas Commission on Environmental Quality. This product is for informational purposes and may not have been prepared for or be suitable for legal engineering, or surveying purposes. It does not represent an on-the-ground survey and represents only the approximate relative location of property boundaries. For more information regarding this map, contact the Information Resource Division at (512) 239-0800.

EXFLUOR RESEARCH CORPORATION
AIR QUALITY PERMIT NO. 165848
MAP B

EXFLUOR RESEARCH CORPORATION Air Quality Permit No. 165848

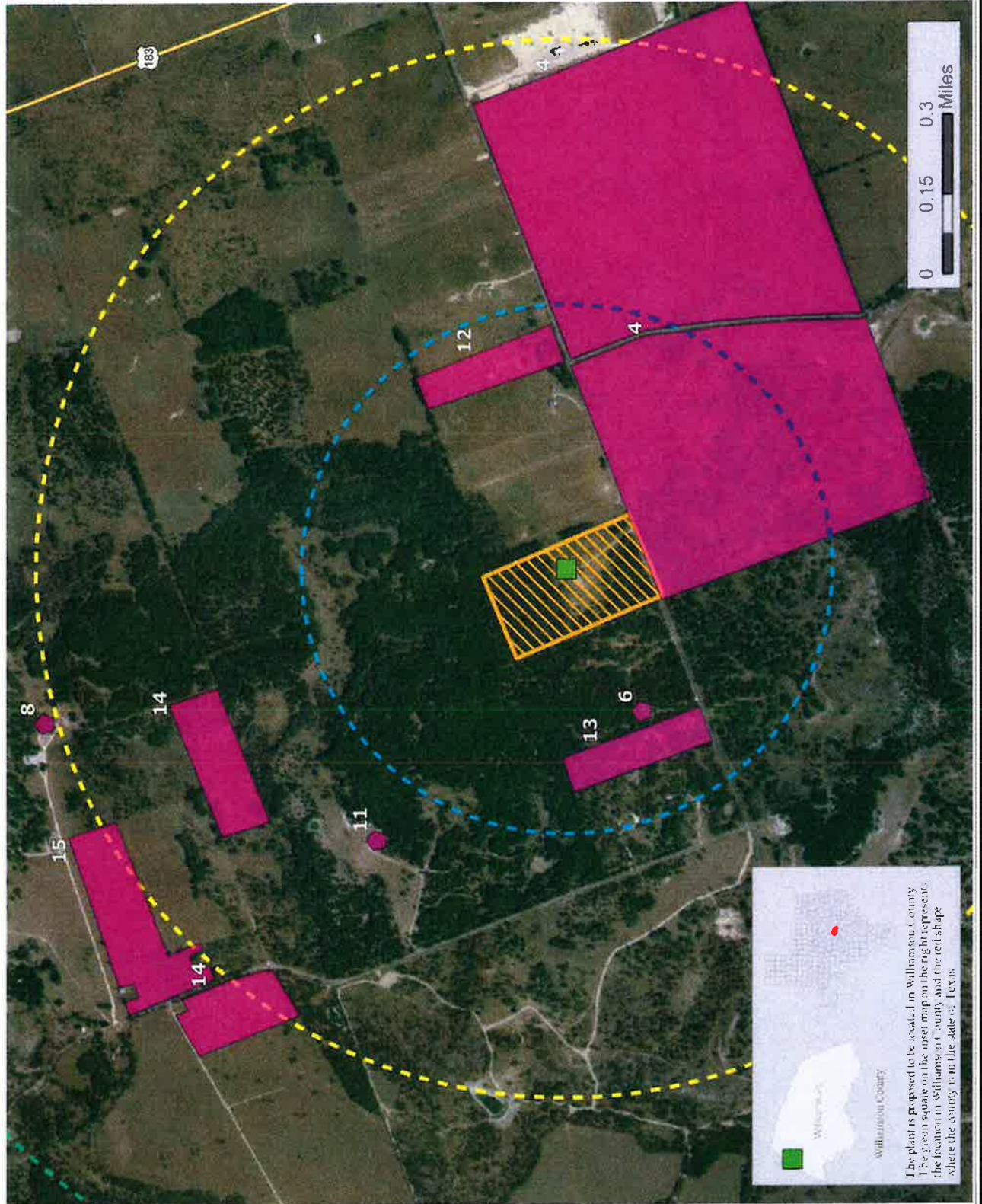


Protecting Texas by
Reducing and
Preventing Pollution

Texas Commission on Environmental Quality
GIS Team (Mail Code 197)
P.O. Box 13087
Austin, Texas 78711-3087
Date: 11/1/2022
CPI: 9073610
Cartographer: A.Bhanna

- Plant
- Requestors (residences)
- Requestors (property)
- Property Line
- 0.5 Mile Radius
- 1.0 Mile Radius
- 1.5 Mile Radius
- County Boundary

Map Requested by: TCEQ Office of Legal Services
for Commissioners' Agenda



Please see Appendix A for a list of requestors and distances from the plant.

Source: The location of the facility was provided by the TCEQ Office of Legal Services (OL S). OL S obtained the location information from the applicant, and the requestor information from the requestor.

This map was generated by the Information Resources Division of the Texas Commission on Environmental Quality. This product is for informational purposes, and may not have been prepared for or be suitable for legal, engineering, or investing purposes. It does not represent an on-the-ground survey, and requestor's only the approximate relative location of property boundaries. For more information concerning this map, contact the Information Resource Division at (512) 239-0800.

The plant is located in Williamson County. The green square on the inset map on the right represents the location of Williamson County, and the red shape where the county is in the state of Texas.

EXFLUOR RESEARCH CORPORATION
AIR QUALITY PERMIT NO. 165848
MAP C

EXFLUOR RESEARCH CORPORATION Air Quality Permit No. 165848



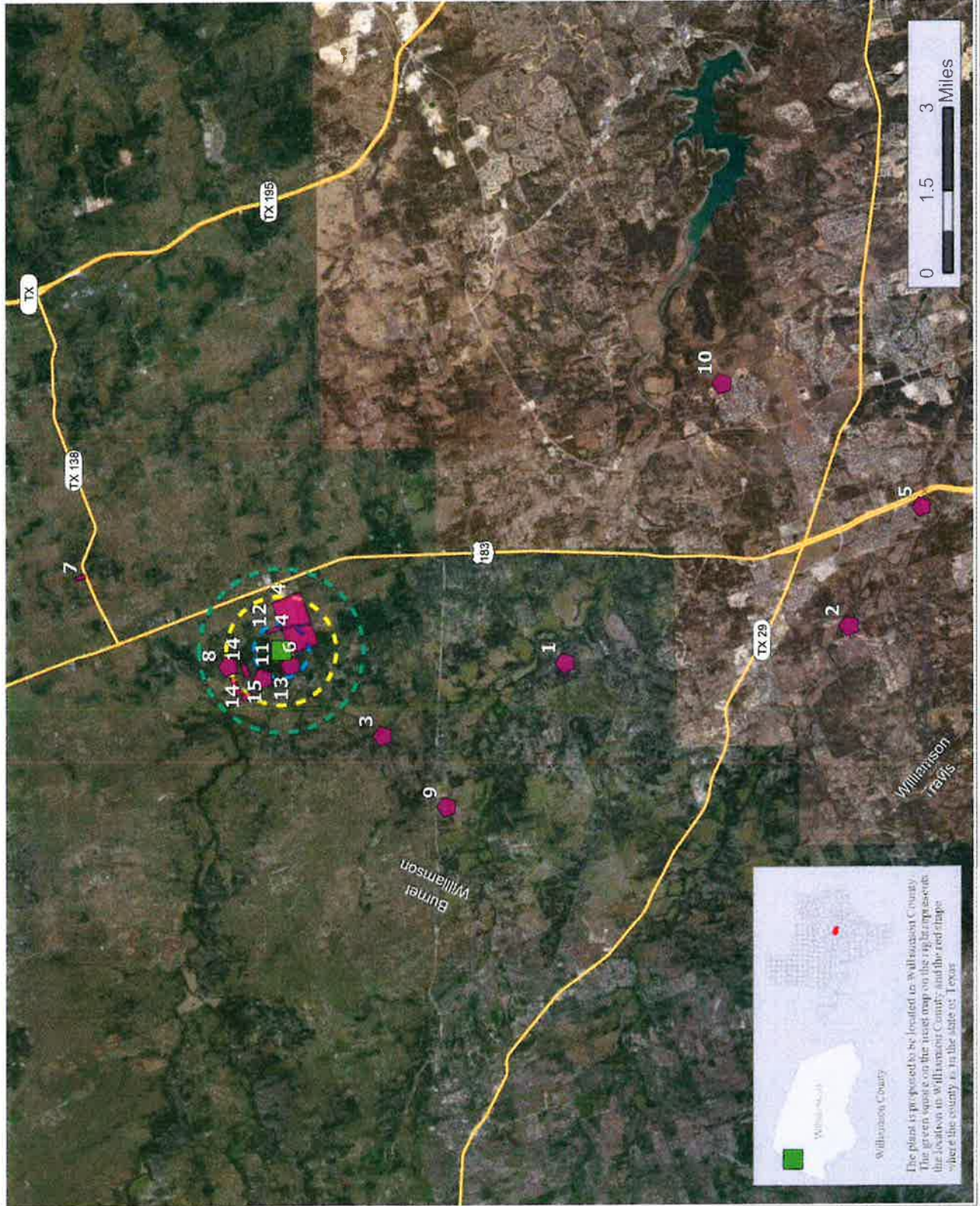
Protecting Texas by
Reducing and
Preventing Pollution

Texas Commission on Environmental Quality
GIS Team (Mail Code 197)
P.O. Box 13087
Austin, Texas 78711-3087
Phone: (512) 3022
CRA: 0019010
Categorization: Air/soil



- Plant
- Requestors (residences)
- Requestors (property)
- Property Line
- 0.5 Mile Radius
- 1.0 Mile Radius
- 1.5 Mile Radius
- County Boundary

Map Requested by: TCEQ Office of Legal Services
for Commissioners' Agenda



Please see Appendix A for a list of requestors and distances from the plant.

Source: The location of the facility was provided by the TCEQ Office of Legal Services (OLS). OLS obtained the location information from the applicant and the requester information from the requester.

This map was generated by the Information Resources Division of the Texas Commission on Environmental Quality. This product is for informational purposes and may not have been prepared for or be suitable for legal engineering or surveying purposes. It does not represent an on-the-ground survey and represents only the approximate relative location of property boundaries. For more information concerning this map, contact the Information Resources Division at (512) 239-0800.

EXFLUOR RESEARCH CORPORATION
AIR QUALITY PERMIT NO. 165848
REQUESTOR'S LIST

Appendix A

Label	Name	Miles from Plant
1	Nicole Elizabeth Bauer	5.18
2	Anne and Thomas Beville	10.36
3	Sheryl Marie Farley	2.41
4	Elizabeth Ann Friou	0.1
5	Kelley Heath	11.97
6	Suzanne Johnson	0.3
7	Catherine Johnston	3.81
8	Bryce Philip McCormick	1.03
9	Joe J. Pacheco	4.17
10	Chris and Renee Peyton	9.39
11	Sandra Lee Thurman	0.63
12	Brittany D. Varner	0.37
13	Shannon White-Shubert	0.33
	Charles Ray Williams, Jr. and Haziell	
14	McCormick Williams	0.71
15	McCormick Ranch	0.97

CERTIFICATE OF SERVICE

I certify that on this 21st day of November 2022, a true and correct copy of the Executive Director's Response to Hearing Requests and Requests for Reconsideration" for Air Quality Permit No. 165848 was served on all persons on the service list by the undersigned via electronic filing, electronic mail, facsimile transmission, inter-agency mail, electronic submittal, or by deposit in the U.S. Mail.



Betsy Peticolas, Staff Attorney
Environmental Law Division

**SERVICE LIST
EXFLUOR RESEARCH CORPORATION
TCEQ DOCKET NO. 2022-1552-AIR
PERMIT NO. 165848**

FOR THE CHIEF CLERK:

via electronic filing
Laurie Gharis, Chief Clerk
Texas Commission on Environmental
Quality
Office of Chief Clerk
P.O. Box 13087, MC-105
Austin, TX 78711-3087

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FOR THE TCEQ EXTERNAL RELATIONS
DIVISION

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Public Education Program, MC-108
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pep@tceq.texas.gov

FOR THE PUBLIC INTEREST COUNSEL:

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Texas Commission on Environmental
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Office of Public Interest Counsel
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RESOLUTION

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For the North San Gabriel Alliance
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Perales Allmon & Ice PC
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lauren@txenvirolaw.com

Application Exhibit 38

TCEQ ED – Backup Material

TEXAS COMMISSION ON ENVIRONMENTAL QUALITY



November 21, 2022

Laurie Gharis, Chief Clerk
Texas Commission on Environmental Quality
P.O. Box 13087, MC 105
Austin, Texas 78711-3087

Re: Backup Material for Executive Director's Response to Hearing Requests and
Response to Requests for Reconsideration
Exflor Research Corporation
Permit No. 165848
TCEQ DOCKET NUMBER 2022-1552-AIR

Dear Ms. Gharis:

Enclosed please find a copy of the following documents for inclusion in the background material for this permit application:

- The draft permit and Maximum Allowable Emissions Rate Table;
- The summary of the technical review of the permit application, which includes a compliance summary of the applicant;
- The Air Quality Analysis Audit memorandum; and
- A compliance summary for the Applicant.

If you have any questions, please do not hesitate to call me at extension 6033 or Abigail Adkins at extension 2496.

Sincerely,

A handwritten signature in black ink, appearing to read "Betsy Peticolas".

Betsy Peticolas
Staff Attorney
Environmental Law Division

Enclosures



Texas Commission on Environmental Quality Air Quality Permit

A Permit Is Hereby Issued To
Exflur Research Corporation
Authorizing the Construction and Operation of
Exflur Research
Located at Florence, Williamson County, Texas
Latitude 30° 47' 28" Longitude -97° 54' 15"

Permit: 165848

Issuance Date: _____

Expiration Date: _____

_____ For the Commission

1. **Facilities** covered by this permit shall be constructed and operated as specified in the application for the permit. All representations regarding construction plans and operation procedures contained in the permit application shall be conditions upon which the permit is issued. Variations from these representations shall be unlawful unless the permit holder first makes application to the Texas Commission on Environmental Quality (commission) Executive Director to amend this permit in that regard and such amendment is approved. [Title 30 Texas Administrative Code (TAC) Section 116.116 (30 TAC § 116.116)]¹
2. **Voiding of Permit.** A permit or permit amendment is automatically void if the holder fails to begin construction within 18 months of the date of issuance, discontinues construction for more than 18 months prior to completion, or fails to complete construction within a reasonable time. Upon request, the executive director may grant an 18-month extension. Before the extension is granted the permit may be subject to revision based on best available control technology, lowest achievable emission rate, and netting or offsets as applicable. One additional extension of up to 18 months may be granted if the permit holder demonstrates that emissions from the facility will comply with all rules and regulations of the commission, the intent of the Texas Clean Air Act (TCAA), including protection of the public's health and physical property; and (b)(1) the permit holder is a party to litigation not of the permit holder's initiation regarding the issuance of the permit; or (b)(2) the permit holder has spent, or committed to spend, at least 10 percent of the estimated total cost of the project up to a maximum of \$5 million. A permit holder granted an extension under subsection (b)(1) of this section may receive one subsequent extension if the permit holder meets the conditions of subsection (b)(2) of this section. [30 TAC § 116.120]
3. **Construction Progress.** Start of construction, construction interruptions exceeding 45 days, and completion of construction shall be reported to the appropriate regional office of the commission not later than 15 working days after occurrence of the event. [30 TAC § 116.115(b)(2)(A)]
4. **Start-up Notification.** The appropriate air program regional office shall be notified prior to the commencement of operations of the facilities authorized by the permit in such a manner that a representative of the commission may be present. The permit holder shall provide a separate notification for the commencement of operations for each unit of phased construction, which may involve a series of units commencing operations at different times. Prior to operation of the facilities authorized by the permit, the permit holder shall identify the source or sources of allowances to be utilized for compliance with Chapter 101, Subchapter H, Division 3 of this title (relating to Mass Emissions Cap and Trade Program). [30 TAC § 116.115(b)(2)(B)]
5. **Sampling Requirements.** If sampling is required, the permit holder shall contact the commission's Office of Compliance and Enforcement prior to sampling to obtain the proper data forms and procedures. All sampling and testing procedures must be approved by the executive director and coordinated with the regional representatives of the commission. The permit holder is also responsible for providing sampling facilities and conducting the sampling operations or contracting with an independent sampling consultant. [30 TAC § 116.115(b)(2)(C)]
6. **Equivalency of Methods.** The permit holder must demonstrate or otherwise justify the equivalency of emission control methods, sampling or other emission testing methods, and monitoring methods proposed as alternatives to methods indicated in the conditions of the permit. Alternative methods shall be applied for in writing and must be reviewed and approved by the executive director prior to their use in fulfilling any requirements of the permit. [30 TAC § 116.115(b)(2)(D)]
7. **Recordkeeping.** The permit holder shall maintain a copy of the permit along with records containing the information and data sufficient to demonstrate compliance with the permit, including production records and

operating hours; keep all required records in a file at the plant site. If, however, the facility normally operates unattended, records shall be maintained at the nearest staffed location within Texas specified in the application; make the records available at the request of personnel from the commission or any air pollution control program having jurisdiction in a timely manner; comply with any additional recordkeeping requirements specified in special conditions in the permit; and retain information in the file for at least two years following the date that the information or data is obtained. [30 TAC § 116.115(b)(2)(E)]

8. **Maximum Allowable Emission Rates.** The total emissions of air contaminants from any of the sources of emissions must not exceed the values stated on the table attached to the permit entitled "Emission Sources-- Maximum Allowable Emission Rates." [30 TAC § 116.115(b)(2)(F)]¹
9. **Maintenance of Emission Control.** The permitted facilities shall not be operated unless all air pollution emission capture and abatement equipment is maintained in good working order and operating properly during normal facility operations. The permit holder shall provide notification in accordance with 30 TAC §101.201, 101.211, and 101.221 of this title (relating to Emissions Event Reporting and Recordkeeping Requirements; Scheduled Maintenance, Startup, and Shutdown Reporting and Recordkeeping Requirements; and Operational Requirements). [30 TAC§ 116.115(b)(2)(G)]
10. **Compliance with Rules.** Acceptance of a permit by an applicant constitutes an acknowledgment and agreement that the permit holder will comply with all rules and orders of the commission issued in conformity with the TCAA and the conditions precedent to the granting of the permit. If more than one state or federal rule or regulation or permit condition is applicable, the most stringent limit or condition shall govern and be the standard by which compliance shall be demonstrated. Acceptance includes consent to the entrance of commission employees and agents into the permitted premises at reasonable times to investigate conditions relating to the emission or concentration of air contaminants, including compliance with the permit. [30 TAC § 116.115(b)(2)(H)]
11. **This** permit may not be transferred, assigned, or conveyed by the holder except as provided by rule. [30 TAC § 116.110(e)]
12. **There** may be additional special conditions attached to a permit upon issuance or modification of the permit. Such conditions in a permit may be more restrictive than the requirements of Title 30 of the Texas Administrative Code. [30 TAC § 116.115(c)]
13. **Emissions** from this facility must not cause or contribute to "air pollution" as defined in Texas Health and Safety Code (THSC) §382.003(3) or violate THSC § 382.085. If the executive director determines that such a condition or violation occurs, the holder shall implement additional abatement measures as necessary to control or prevent the condition or violation.
14. **The** permit holder shall comply with all the requirements of this permit. Emissions that exceed the limits of this permit are not authorized and are violations of this permit.¹

¹ Please be advised that the requirements of this provision of the general conditions may not be applicable to greenhouse gas emissions.

Common Acronyms in Air Permits

°C = Temperature in degrees Celsius	GLC _{max} = maximum (predicted) ground-level concentration
°F = Temperature in degrees Fahrenheit	gpm = gallon per minute
°K = Temperature in degrees Kelvin	gr/1000scf = grain per 1000 standard cubic feet
µg = microgram	gr/dscf = grain per dry standard cubic feet
µg/m ³ = microgram per cubic meter	H ₂ CO = formaldehyde
acfm = actual cubic feet per minute	H ₂ S = hydrogen sulfide
AMOC = alternate means of control	H ₂ SO ₄ = sulfuric acid
AOS = alternative operating scenario	HAP = hazardous air pollutant as listed in § 112(b) of the Federal Clean Air Act or Title 40 Code of Federal Regulations Part 63, Subpart C
AP-42 = Air Pollutant Emission Factors, 5th edition	HC = hydrocarbons
APD = Air Permits Division	HCl = hydrochloric acid, hydrogen chloride
API = American Petroleum Institute	Hg = mercury
APWL = air pollutant watch list	HGB = Houston/Galveston/Brazoria
BPA = Beaumont/ Port Arthur	hp = horsepower
BACT = best available control technology	hr = hour
BAE = baseline actual emissions	IFR = internal floating roof tank
bbl = barrel	in H ₂ O = inches of water
bbl/day = barrel per day	in Hg = inches of mercury
bhp = brake horsepower	IR = infrared
BMP = best management practices	ISC3 = Industrial Source Complex, a dispersion model
Btu = British thermal unit	ISCST3 = Industrial Source Complex Short-Term, a dispersion model
Btu/scf = British thermal unit per standard cubic foot or feet	K = Kelvin; extension of the degree Celsius scaled-down to absolute zero
CAA = Clean Air Act	LACT = lease automatic custody transfer
CAM = compliance-assurance monitoring	LAER = lowest achievable emission rate
CEMS = continuous emissions monitoring systems	lb = pound
cfm = cubic feet (per) minute	hp = horsepower
CFR = Code of Federal Regulations	hr = hour lb/day = pound per day
CN = customer ID number	lb/hr = pound per hour
CNG = compressed natural gas	lb/MMBtu = pound per million British thermal units
CO = carbon monoxide	LDAR = Leak Detection and Repair (Requirements)
COMS = continuous opacity monitoring system	LNG = liquefied natural gas
CPMS = continuous parametric monitoring system	LPG = liquefied petroleum gas
DFW = Dallas/ Fort Worth (Metroplex)	LT/D = long ton per day
DE = destruction efficiency	m = meter
DRE = destruction and removal efficiency	m ³ = cubic meter
dscf = dry standard cubic foot or feet	m/sec = meters per second
dscfm = dry standard cubic foot or feet per minute	MACT = maximum achievable control technology
ED = (TCEQ) Executive Director	MAERT = Maximum Allowable Emission Rate Table
EF = emissions factor	MERA = Modeling and Effects Review Applicability
EFR = external floating roof tank	mg = milligram
EGU = electric generating unit	mg/g = milligram per gram
EI = Emissions Inventory	mL = milliliter
ELP = El Paso	MMBtu = million British thermal units
EPA = (United States) Environmental Protection Agency	MMBtu/hr = million British thermal units per hour
EPN = emission point number	MSDS = material safety data sheet
ESL = effects screening level	MSS = maintenance, startup, and shutdown
ESP = electrostatic precipitator	MW = megawatt
FCAA = Federal Clean Air Act	NAAQS = National Ambient Air Quality Standards
FCCU = fluid catalytic cracking unit	NESHAP = National Emission Standards for Hazardous Air Pollutants
FID = flame ionization detector	NGL = natural gas liquids
FIN = facility identification number	NNSR = nonattainment new source review
ft = foot or feet	NO _x = total oxides of nitrogen
ft/sec = foot or feet per second	
g = gram	
gal/wk = gallon per week	
gal/yr = gallon per year	
GLC = ground level concentration	

NSPS = New Source Performance Standards
PAL = plant-wide applicability limit
PBR = Permit(s) by Rule
PCP = pollution control project
PEMS = predictive emission monitoring system
PID = photo ionization detector
PM = periodic monitoring
PM = total particulate matter, suspended in the atmosphere, including PM₁₀ and PM_{2.5}, as represented
PM_{2.5} = particulate matter equal to or less than 2.5 microns in diameter
PM₁₀ = total particulate matter equal to or less than 10 microns in diameter, including PM_{2.5}, as represented
POC = products of combustion
ppb = parts per billion
ppm = parts per million
ppmv = parts per million (by) volume
psia = pounds (per) square inch, absolute
psig = pounds (per) square inch, gage
PTE = potential to emit
RA = relative accuracy
RATA = relative accuracy test audit
RM = reference method
RVP = Reid vapor pressure
scf = standard cubic foot or feet
scfm = standard cubic foot or feet (per) minute
SCR = selective catalytic reduction
SIL = significant impact levels
SNCR = selective non-catalytic reduction
SO₂ = sulfur dioxide
SOCMI = synthetic organic chemical manufacturing industry
SRU = sulfur recovery unit
TAC = Texas Administrative Code
TCAA = Texas Clean Air Act
TCEQ = Texas Commission on Environmental Quality
TD = Toxicology Division
TLV = threshold limit value
TMDL = total maximum daily load
tpd = tons per day
tpy = tons per year
TVP = true vapor pressure
VOC = volatile organic compounds as defined in Title 30 Texas Administrative Code § 101.1
VRU = vapor recovery unit or system

Special Conditions

Permit Number 165848

1. This permit covers only those sources of emissions listed in the attached table entitled "Emission Sources - Maximum Allowable Emission Rates" (MAERT), and those sources are limited to the emission limits and other conditions specified in that table.
2. Non-fugitive emissions from relief valves, safety valves, or rupture discs of gases containing volatile organic compounds (VOC) at a concentration of greater than 1 percent are not authorized by this permit unless authorized on the MAERT. Any releases directly to atmosphere from relief valves, safety valves, or rupture discs of gases containing VOC at a concentration greater than 1 weight percent are not consistent with good practice for minimizing emissions.

Emission Standards and Operational Specifications

3. The process vents from the Fluorine Generators, Fluorination Reactors, Thermal Cracking Reactors, Distillation Units, Polishing Reactors, Reduction Reactors, Hydrolysis Reactors, Methanolysis Reactors, Bromination Reactors, Extraction Tank, Anhydride Flasks, Acrylate Flasks, and Drying Flask shall be routed to the Exhaust Gas Vent System (EPN EP3-1).
4. Annual production shall not the rates listed in the Table 2-Material Balance submitted with application form PI-1 dated July 9, 2021. Production records shall be updated monthly with the rates of each product produced during the previous month and rolling 12 months to date.
5. The thermal oxidizers shall be fired with hydrogen.

Thermal Oxidizers

6. The following requirements shall apply to Thermal Oxidizer 1 (EPN EP3-1).
 - A. Thermal Oxidizer 1 (EPN EP3-1), shall maintain the VOC concentration in the exhaust gas less than 10 ppmv on a dry basis, corrected to 3 percent oxygen, or achieve a VOC destruction efficiency greater than 99.9 percent.
 - B. The thermal oxidizer firebox exit temperature shall be maintained at not less than 2000°C and exhaust oxygen concentration not less than 3 percent on a six-minute average while waste gas is being fed into the oxidizer prior to initial stack testing. After the initial stack test has been completed, the six minute average temperature shall be equal to, or greater than the respective hourly average maintained during the most recent satisfactory stack testing required by Special Condition No. 9.
 - C. The thermal oxidizer exhaust temperature shall be continuously monitored and recorded when waste gas is directed to the oxidizer. The temperature measurement device shall reduce the temperature readings to an averaging period of 6 minutes or less and record it at that frequency. The temperature measurement device shall be installed, calibrated, and maintained according to accepted practice and the manufacturer's specifications. The device shall have an accuracy of the greater of ± 0.75 percent of the temperature being measured expressed in degrees Celsius or $\pm 2.5^\circ\text{C}$.

Quality assured (or valid) data must be generated when the thermal oxidizer is operating except during the performance of a daily zero and span check. Loss of valid data due to periods of monitor break down, out-of-control operation (producing inaccurate data), repair, maintenance, or calibration may be exempted provided it does not exceed 5 percent of the

time (in minutes) that the thermal oxidizer operated over the previous rolling 12 month period. The measurements missed shall be estimated using engineering judgment and the methods used recorded.

- D. The oxygen analyzer used to satisfy this Special Condition shall continuously monitor and record oxygen concentration when waste gas is directed to the oxidizer. It shall reduce the oxygen readings to an averaging period of 6 minutes or less and record it at that frequency.

The oxygen analyzer shall be zeroed and spanned daily and corrective action taken when the 24-hour span drift exceeds two times the amounts specified Performance Specification No. 3, 40 CFR Part 60, Appendix B. Zero and span is not required on weekends and plant holidays if instrument technicians are not normally scheduled on those days.

The analyzer shall be quality-assured at least semiannually using cylinder gas audits (CGAs) in accordance with 40 CFR Part 60, Appendix F, Procedure 1, § 5.1.2, with the following exception: a relative accuracy test audit is not required once every four quarters (i.e., two successive semiannual CGAs may be conducted). An equivalent quality-assurance method approved by the TCEQ may also be used. Successive semiannual audits shall occur no closer than four months. Necessary corrective action shall be taken for all CGA exceedances of ± 15 percent accuracy and any continuous emissions monitoring system downtime in excess of 5 percent of the incinerator operating time. These occurrences and corrective actions shall be reported to the appropriate TCEQ Regional Director on a quarterly basis. Supplemental stack concentration measurements may be required at the discretion of the appropriate TCEQ Regional Director.

Quality assured (or valid) data must be generated when the thermal oxidizer is operating except during the performance of a daily zero and span check. Loss of valid data due to periods of monitor break down, out-of-control operation (producing inaccurate data), repair, maintenance, or calibration may be exempted provided it does not exceed 5 percent of the time (in minutes) that the thermal oxidizer operated over the previous rolling 12 month period. The measurements missed shall be estimated using engineering judgment and the methods used recorded.

7. The following requirements shall apply to Thermal Oxidizer 2 (EPN EP3-1).
- A. Thermal Oxidizer 2 (EPN EP3-1), shall maintain the VOC concentration in the exhaust gas less than 10 ppmv on a dry basis, corrected to 3 percent oxygen, or achieve a VOC destruction efficiency greater than 99.9 percent.
 - B. The thermal oxidizer firebox exit temperature shall be maintained at not less than 2000°C and exhaust oxygen concentration not less than 3 percent on a six-minute average while waste gas is being fed into the oxidizer prior to initial stack testing. After the initial stack test has been completed, the six minute average temperature shall be equal to, or greater than the respective hourly average maintained during the most recent satisfactory stack testing required by Special Condition No. 9.
 - C. The thermal oxidizer exhaust temperature shall be continuously monitored and recorded when waste gas is directed to the oxidizer. The temperature measurement device shall reduce the temperature readings to an averaging period of 6 minutes or less and record it at that frequency. The temperature measurement device shall be installed, calibrated, and maintained according to accepted practice and the manufacturer's specifications. The device

shall have an accuracy of the greater of ± 0.75 percent of the temperature being measured expressed in degrees Celsius or $\pm 2.5^{\circ}\text{C}$.

Quality assured (or valid) data must be generated when the thermal oxidizer is operating except during the performance of a daily zero and span check. Loss of valid data due to periods of monitor break down, out-of-control operation (producing inaccurate data), repair, maintenance, or calibration may be exempted provided it does not exceed 5 percent of the time (in minutes) that the thermal oxidizer operated over the previous rolling 12 month period. The measurements missed shall be estimated using engineering judgment and the methods used recorded.

- D. The oxygen analyzer used to satisfy this Special Condition shall continuously monitor and record oxygen concentration when waste gas is directed to the oxidizer. It shall reduce the oxygen readings to an averaging period of 6 minutes or less and record it at that frequency.

The oxygen analyzer shall be zeroed and spanned daily and corrective action taken when the 24-hour span drift exceeds two times the amounts specified Performance Specification No. 3, 40 CFR Part 60, Appendix B. Zero and span is not required on weekends and plant holidays if instrument technicians are not normally scheduled on those days.

The analyzer shall be quality-assured at least semiannually using cylinder gas audits (CGAs) in accordance with 40 CFR Part 60, Appendix F, Procedure 1, § 5.1.2, with the following exception: a relative accuracy test audit is not required once every four quarters (i.e., two successive semiannual CGAs may be conducted). An equivalent quality-assurance method approved by the TCEQ may also be used. Successive semiannual audits shall occur no closer than four months. Necessary corrective action shall be taken for all CGA exceedances of ± 15 percent accuracy and any continuous emissions monitoring system downtime in excess of 5 percent of the incinerator operating time. These occurrences and corrective actions shall be reported to the appropriate TCEQ Regional Director on a quarterly basis. Supplemental stack concentration measurements may be required at the discretion of the appropriate TCEQ Regional Director.

Quality assured (or valid) data must be generated when the thermal oxidizer is operating except during the performance of a daily zero and span check. Loss of valid data due to periods of monitor break down, out-of-control operation (producing inaccurate data), repair, maintenance, or calibration may be exempted provided it does not exceed 5 percent of the time (in minutes) that the thermal oxidizer operated over the previous rolling 12 month period. The measurements missed shall be estimated using engineering judgment and the methods used recorded.

Fugitives

Piping, Valves, Pumps, and Compressors in contact with Hydrogen Fluoride - 28AVO

8. Except as may be provided for in the Special Conditions of this permit, the following requirements apply to the above-referenced equipment:
- A. Audio, olfactory, and visual checks for leaks within the operating area shall be made every four hours.

- B. Immediately, but no later than one hour upon detection of a leak, plant personnel shall take at least one of the following actions:
- (1) Isolate the leak.
 - (2) Commence repair or replacement of the leaking component.
 - (3) Use a leak collection/containment system to prevent the leak until repair or replacement can be made if immediate repair is not possible.

Date and time of each inspection shall be noted in the operator's log or equivalent. Records shall be maintained at the plant site of all repairs and replacements made due to leaks. These records shall be made available to representatives of the Texas Commission on Environmental Quality (TCEQ) upon request.

Initial Determination of Compliance

9. The permit holder shall perform stack sampling and other testing as required to establish the actual pattern and quantities of air contaminants being emitted into the atmosphere from the thermal oxidizers to demonstrate compliance with the MAERT and Special Condition Nos. 6.A. and 7.A. The permit holder is responsible for providing sampling and testing facilities and conducting the sampling and testing operations at his expense. Sampling shall be conducted in accordance with the appropriate procedures of the Texas Commission on Environmental Quality (TCEQ) Sampling Procedures Manual and the U.S. Environmental Protection Agency (EPA) Reference Methods.

Requests to waive testing for any pollutant specified in this condition shall be submitted to the TCEQ Office of Air, Air Permits Division. Test waivers and alternate/equivalent procedure proposals for Title 40 Code of Federal Regulation Part 60 (40 CFR Part 60) testing which must have EPA approval shall be submitted to the TCEQ Regional Director.

- A. The appropriate TCEQ Regional Office shall be notified not less than 45 days prior to sampling. The notice shall include:
- (1) Proposed date for pretest meeting.
 - (2) Date sampling will occur.
 - (3) Name of firm conducting sampling.
 - (4) Type of sampling equipment to be used.
 - (5) Method or procedure to be used in sampling.
 - (6) Description of any proposed deviation from the sampling procedures specified in this permit or TCEQ/EPA sampling procedures.
 - (7) Procedure/parameters to be used to determine worst case emissions.

The purpose of the pretest meeting is to review the necessary sampling and testing procedures, to provide the proper data forms for recording pertinent data, and to review the format procedures for the test reports. The TCEQ Regional Director must approve any deviation from specified sampling procedures.

- B. Air contaminants emitted from the thermal oxidizers to be tested for include (but are not limited to) VOC.

- C. Sampling shall occur within 60 days after achieving the maximum operating rate, but no later than 180 days after initial start-up of the facilities (or increase in production, as appropriate) and at such other times (identify the need for any periodic sampling here) as may be required by the TCEQ Executive Director. Requests for additional time to perform sampling shall be submitted to the appropriate regional office.
- D. The facility being sampled shall operate at maximum production during stack emission testing. These conditions/parameters and any other primary operating parameters that affect the emission rate shall be monitored and recorded during the stack test. Any additional parameters shall be determined at the pretest meeting and shall be stated in the sampling report. Permit conditions and parameter limits may be waived during stack testing performed under this condition if the proposed condition/parameter range is identified in the test notice specified in paragraph A and accepted by the TCEQ Regional Office. Permit allowable emissions and emission control requirements are not waived and still apply during stack testing periods.

During subsequent operations, if the production is greater than that recorded during the test period, stack sampling shall be performed at the new operating conditions within 120 days. This sampling may be waived by the TCEQ Air Section Manager for the region.
- E. Copies of the final sampling report shall be forwarded to the offices below within 60 days after sampling is completed. Sampling reports shall comply with the attached provisions entitled "Chapter 14, Contents of Sampling Reports" of the TCEQ Sampling Procedures Manual. The reports shall be distributed as follows:
 - One copy to the appropriate TCEQ Regional Office.
 - One copy to each local air pollution control program.
- F. Sampling ports and platform(s) shall be incorporated into the design of (source stack and EPN) according to the specifications set forth in the attachment entitled "Chapter 2, Guidelines for Stack Sampling Facilities" of the Texas Commission on Environmental Quality (TCEQ) Sampling Procedures Manual. Alternate sampling facility designs must be submitted for approval to the TCEQ Regional Director.

Disaster Review

- 10. The holder of this permit shall comply with EPA regulations on Chemical Accident Prevention Provisions promulgated in 40 CFR Part 68. The Risk Management Plan (RMP) shall be submitted to the TCEQ Office of Air, Air Permits Division prior to the date this site first exceeds a threshold quantity of hydrogen fluoride.

Chemical Flexibility

- 11. Except as provided for below, the use of compounds at the Exflor Research Corporation facility is limited to those identified in the permit application, PI-1 dated, July 7, 2021 (including subsequent submittals made during the permit application review process). New compounds may be added through the use of the procedure below, 30 TAC Chapter 106, or 30 TAC Chapter 116.
 - A. Short-term (pounds per hour [lb/hr]) and annual (TPY) emissions and calculations shall be completed for each chemical at each affected source. Emission rates (ER) shall be calculated with the methods documented in the permit application PI-1 dated, July 7, 2021.

The calculated ER shall not exceed the maximum allowable emissions rate at any emission point.

- B. The Effect Screening Level (ESL) for the compound shall be obtained from the current TCEQ ESL list or by written request to the TCEQ Toxicology Section.
- C. The new compounds or chemicals shall serve the same basic function and the emissions shall be from the same location as the emissions from the current materials.
- D. All the compounds within a new mixture are known, i.e. the weight percentages of the ingredients add to 100 percent or more.
- E. Any air contaminant compound in a new mixture is exempt from the requirements of subparagraph F. below if it meets one of the following conditions:
 - (1) It is emitted at a rate and has a short-term Effects Screening Level (ESL) as stated in the following table; or

Emission Rate (lbs/hr)	Short-term ESL ($\mu\text{g}/\text{m}_3$)
≤ 0.04	≥ 2 & < 500
≤ 0.10	≥ 500 & $< 3,500$
≤ 0.40	$\geq 3,500$

- (2) It has a true vapor pressure at 68°F of less than 0.01 mm Hg.

F. For all other new or increased air contaminants the following procedure shall be completed:

- (1) Determine the emission rate (ER) of each air contaminant ingredient including emissions of the same air contaminant from currently authorized materials that may be emitted at the same time from each emission point.
- (2) Multiply the emission rate of the air contaminant by the unit impact multiplier for each emission point from the following table to determine the off-property impact (Ground Level Concentration (GLC)) for each emission point.

Emission Point	Unit Impact ($\mu\text{g}/\text{m}_3$ per lb/hr)
EP3-1	415.37
EP3-2	56.87
EP3-3	57.54
FUG3-1	37.36
FUG3-2	57.59
FUG3-3	55.58
FUG3-4	55.87

- (3) Sum the impacts from each emission point/emission point group to determine a total off- property impact (Total GLC_{MAX}) for the new or increased air contaminant.
- (4) Compare the total off-property impact to the ESL for the air contaminant as

follows: $\text{Total GLC}_{\text{MAX}} \leq \text{ESL}_{\text{NEW}}$

Where:

$\text{Total GLC}_{\text{MAX}}$ = the sum of the GLCs from each emission point.

ESL_{new} = short-term ESL of new ingredient air contaminant from the most current ESL list published by the TCEQ or as specifically derived by TCEQ Toxicology Section. The ESL shall be obtained in writing prior to the use of the new or increased air contaminant.

- G. Short-term emission rates from new or increased air contaminants shall not cause any increases in air contaminant category annual emission rates as listed on the maximum allowable emission rates table (MAERT).
- H. The permit holder shall maintain records of the information below and the demonstrations in steps A through C above. The following documentation is required for each compound:
- (1) Chemical name(s), composition, and chemical abstract registry number if available.
 - (2) True vapor pressure at maximum hourly and annual average storage temperature.
 - (3) Molecular weight.
 - (4) Storage tanks, loading areas, and fugitive areas where the material is to be handled and the emission control device to be utilized.
 - (5) Date new compound handling commenced.
 - (6) Material Safety Data Sheet.
 - (7) Maximum concentration of the chemical in mole percent (or in weight percent for fugitive areas) in the affected facilities

Permit by Rule

12. The following sources and/or activities are authorized under a Permit by Rule (PBR) by Title 30 Texas Administrative Code Chapter 106 (30 TAC Chapter 106). These lists are not intended to be all inclusive and can be altered without modifications to this permit.

Authorization	Source or Activity
30 TAC § 106.263 (effective 11/01/01)	Routine Facility Maintenance

Date: _____ TBD

Emission Sources - Maximum Allowable Emission Rates

Permit Number 165848

This table lists the maximum allowable emission rates and all sources of air contaminants on the applicant's property covered by this permit. The emission rates shown are those derived from information submitted as part of the application for permit and are the maximum rates allowed for these facilities, sources, and related activities. Any proposed increase in emission rates may require an application for a modification of the facilities covered by this permit.

Air Contaminants Data

Emission Point No. (1)	Source Name (2)	Air Contaminant Name (3)	Emission Rates	
			lbs/hour	TPY (4)
EP3-1	Exhaust Gas Vent System, Thermal Oxidizer 1, and Thermal Oxidizer 2	VOC	0.16	0.14
		NO _x	0.03	0.13
		CO	0.04	0.18
		PM	<0.01	0.02
		PM ₁₀	<0.01	0.02
		PM _{2.5}	<0.01	0.02
		HF	<0.01	0.03
		HCl	0.02	0.09
		F ₂	<0.01	<0.01
		Br ₂	<0.01	<0.01
		HBr	<0.01	<0.01
		Exempt organic compounds	1.05	4.40
EP3-2	Washing Reactor 1	VOC	0.73	0.20
EP3-3	Washing Reactor 2	VOC	0.98	0.27
EP3-4	Water Reservoir	VOC	< 0.01	0.02
FUG3-1	Building 3 Fugitives (5)	VOC	1.75	7.67
		HF	0.13	0.56
		F ₂	0.10	0.45
		Br ₂	0.14	0.60
		H ₂	0.06	0.26
		Exempt organic compounds	1.65	7.21
FUG3-2	Reduction Reactor 1 Fugitives (5)	VOC	0.03	0.13
		HCl	0.01	0.03

Construction Permit Source Analysis & Technical Review

Company	Exfluor Research Corporation	Permit Number	165848
City	Florence	Project Number	331049
County	Williamson	Regulated Entity Number	RN110969227
Project Type	Initial	Customer Reference Number	CN602696791
Project Reviewer	Cara Hill	Received Date	July 9, 2021
Site Name	Exfluor Research		

Project Overview

Exfluor Research Corporation (Exfluor) submitted an initial expedited permit application proposing to construct a new specialty manufacturing facility located near Florence, Williamson County. The proposed facility will produce a variety of perfluorocarbons. Maintenance, Startup, and Shutdown (MSS) activities will be authorized by Permit by Rule (PBR) 106.263.

Exfluor Research Corporation is proposing to build a new specialty manufacturing facility that will produce a variety of perfluorocarbons.

Emission Summary

Air Contaminant	Proposed Allowable Emission Rates (tpy)
PM	0.02
PM ₁₀	0.02
PM _{2.5}	0.02
VOC	8.79
NO _x	0.13
CO	0.18
Fluoride	20.18

Compliance History Evaluation - 30 TAC Chapter 60 Rules

A compliance history report was reviewed on:	July 14, 2021
Site rating & classification:	N/A
Company rating & classification:	3.31 / Satisfactory
Has the permit changed on the basis of the compliance history or rating?	No
Did the Regional Office have any comments? If so, explain.	No

Public Notice Information

Requirement	Date
Legislator letters mailed	7/14/2021
Date 1 st notice published	07/28/2021
Publication Name: <i>Williamson County Sun</i>	
Pollutants: hydrogen fluorides, carbon monoxide, hazardous air pollutants, nitrogen oxides and organic compounds	
Date 1 st notice Alternate Language published	07/29/2021

Construction Permit Source Analysis & Technical Review

Permit Number: 165848

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Requirement	Date
Publication Name (Alternate Language): <i>El Mundo</i>	
1 st public notice tearsheet(s) received	08/05/2021
1 st public notice affidavit(s) received	08/05/2021
1 st public notice certification of sign posting/application availability received	09/07/2021
SB709 Notification mailed	7/14/2021 (re-notice 2/17/2022)
Date 2 nd notice published	
Publication Name:	
Pollutants:	
Date 2 nd notice published (Alternate Language)	
Publication Name (Alternate Language):	
2 nd public notice tearsheet(s) received	
2 nd public notice affidavit(s) received	
2 nd public notice certification of sign posting/application availability received	

Public Interest

Number of comments received	
Number of meeting requests received	
Number of hearing requests received	
Date meeting held	
Date response to comments filed with OCC	
Date of SOAH hearing	

Federal Rules Applicability

Requirement

Subject to NSPS?	No
Subparts N/A	
Subject to NESHAP?	No
Subparts N/A	
Subject to NESHAP (MACT) for source categories?	No
Subparts N/A	

Nonattainment review applicability:

The manufacturing plant is located in Williamson County, which is classified as attainment for all criteria pollutants. Nonattainment review is not applicable.

Construction Permit Source Analysis & Technical Review

Permit Number: 165848
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Regulated Entity No. RN110969227

Requirement

PSD review applicability:

The manufacturing plant is located in Williamson County, which is classified as attainment for all criteria pollutants. The plant is a named source and has a potential to emit (PTE) less than 100 tpy for all pollutants. PSD review is not applicable.

Title V Applicability - 30 TAC Chapter 122 Rules

Requirement

Title V applicability:

The site is a minor source and not subject to the Title V program.

Periodic Monitoring (PM) applicability:

This site is a minor source and is not subject to 40 CFR 70 periodic monitoring requirements; however, the following monitoring requirements apply.

- Continuous monitoring of temperature and oxygen for the thermal oxidizer.
- Implementation of the 28AVO monitoring program.

Compliance Assurance Monitoring (CAM) applicability:

CAM is not applicable because the site is not a major source.

Process Description

Exflur facility consists of 1 large warehouse building that includes office space and laboratories situated on over 36 acres. Exflur will produce a variety of specialty fluorocarbons by a fluorination process. Various hydrocarbons are slowly reacted with fluorine (F₂) gas in a stirred fluorine-inert solvent. The resulting products are typically purified by distillation to give the perfluorinated (completely fluorinated) products. The fluorine gas used in making the products is generated onsite. The detailed process description is considered confidential and is provided in the separate confidential part of the permit application.

Project Scope

Exflur is requesting authorization for a new facility that will produce a variety of perfluorocarbons. A summary of the draft permit requirements, including control, monitoring, recordkeeping and reporting requirements, is given below.

SC No.	Comment
1	Incorporates MAERT and limits scope of authorization to sources listed on MAERT.
2	Generic prohibition on releases from uncontrolled process vents, limits on permit holder's ability to claim affirmative defense under 30 TAC Chap. 101 for releases from pressure relief devices.
3	Required control of process vents.
4	Production limitations.
5	Fuel specification.
6-7	Operational requirements for thermal oxidizers, including continuous parametric monitoring requirements.
8	Required LDAR program.
9	Stack sampling requirements.
10	RMP requirements
11	Chemical flexibility requirements.
12	Permit by rule incorporated by reference

Construction Permit Source Analysis & Technical Review

Permit Number: 165848
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Regulated Entity No. RN110969227

Best Available Control Technology

EPN	Source Name	Best Available Control Technology Description
EP3-1	Thermal Oxidizer 1	The thermal oxidizer must achieve 99.9% destruction efficiency. This is to be demonstrated through initial stack sampling and by maintaining the firebox temperature at or above the temperature demonstrated during the stack test (6-minute average) during subsequent operations. Prior to the initial stack test, the firebox temperature must be maintained at or above 2000°C. Collateral NO _x emissions are limited to 0.06 lb/MMBtu, based on the higher heating value of the waste gas.
EP3-1	Thermal Oxidizer 2	The thermal oxidizer must achieve 99.9% destruction efficiency. This is to be demonstrated through initial stack sampling and by maintaining the firebox temperature at or above the temperature demonstrated during the stack test (6-minute average) during subsequent operations. Prior to the initial stack test, the firebox temperature must be maintained at or above 2000°C. Collateral NO _x emissions are limited to 0.06 lb/MMBtu, based on the higher heating value of the waste gas.
EP3-1	Process Vents	Process vents other than EPN EP3-2 and EPN EP3-3 will be routed to one of the thermal oxidizers.
EP3-2	Washing Reactor 1	Process vent are uncontrolled and are limited in time, duration, and/or concentration of vent stream.
EP3-3	Washing Reactor 2	
EP3-4	Water Reservoir	
FUG3-1	Building 3 Fugitives	Uncontrolled sitewide VOC fugitives are less than 10 tpy. Monitoring of components in HF service are monitored with the 28 AVO program.
FUG3-2	Reduction Reactor 1 Fugitives	
FUG3-3	Reduction Reactor 2 Fugitives	
FUG3-4	Reduction Reactor 3 Fugitives	
FUG3-5	Solvent Strip Column 3 Fugitives	

Permits Incorporation

Permit by Rule (PBR) / Standard Permit / Permit Nos.	Description (include affected EPNs)	Action (Reference / Consolidate / Void)
N/A	N/A	N/A

Impacts Evaluation

Was modeling conducted?	Yes	Type of Modeling:	AERMOD
Is the site within 3,000 feet of any school?	No		
Additional site/land use information:	N/A		

Air dispersion modeling was performed by the applicant to evaluate total air emissions from the proposed plant. Based on the results of the dispersion model, emissions from the site are not expected to result in a violation of any state or national ambient air quality standard. Emissions of non-criteria air contaminants are not expected to create adverse impacts to public health. The air dispersion modeling demonstration was audited by the TCEQ Air Dispersion Modeling Team and approved. The results are summarized in a memo dated November 18, 2021 (WCC Content ID 5843027).

**Construction Permit
Source Analysis & Technical Review**

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Regulated Entity No. RN110969227

Project Reviewer	Date	Team Leader	Date
Cara Hill		Joel Stanford	

TCEQ Interoffice Memorandum

To: Cara Hill
Mechanical/Coatings Section

Thru: Chad Dumas, Team Leader
Air Dispersion Modeling Team (ADMT)

From: Ahmed Omar, P.E.
ADMT

Date: November 18, 2021

Subject: **Air Quality Analysis Audit – Exflur Research Corporation (RN110969227)**

1. Project Identification Information

Permit Application Number: 165848
NSR Project Number: 331049
ADMT Project Number: 7632
County: Williamson
Published Map: \\tceq4avmgisdata\GISWRK\APD\MODEL_PROJECTS\7632\7632.pdf

Air Quality Analysis: Submitted by Waid Environmental, October 2021, on behalf of Exflur Research Corporation. Additional information was provided November 2021.

2. Report Summary

The air quality analysis is acceptable for all review types and pollutants. The results are summarized below.

A. Minor Source NSR and Air Toxics Analysis

Table 1. Modeling Results for Minor NSR De Minimis

Pollutant	Averaging Time	GLCmax ($\mu\text{g}/\text{m}^3$)	De Minimis ($\mu\text{g}/\text{m}^3$)
PM ₁₀	24-hr	0.1	5
PM _{2.5}	24-hr	0.1	1.2
PM _{2.5}	Annual	0.01	0.2
NO ₂	1-hr	7	7.5
NO ₂	Annual	0.1	1
CO	1-hr	10	2000
CO	8-hr	3	500

The GLCmax are the maximum predicted concentrations associated with one year of meteorological data.

TCEQ Interoffice Memorandum

Generic modeling was used for the above analyses; refer to section 3 for more details on the generic modeling.

The justification for selecting the EPA's interim 1-hr NO₂ De Minimis level was based on the assumptions underlying EPA's development of the 1-hr NO₂ De Minimis level. As explained in EPA guidance memoranda¹, the EPA believes it is reasonable as an interim approach to use a De Minimis level that represents 4% of the 1-hr NO₂ NAAQS.

The PM_{2.5} De Minimis levels are the EPA recommended De Minimis levels. The use of the EPA recommended De Minimis levels is sufficient to conclude that a proposed source will not cause or contribute to a violation of a PM_{2.5} NAAQS based on the analyses documented in EPA guidance and policy memorandums².

To evaluate secondary PM_{2.5} impacts, the applicant provided an analysis based on a Tier 1 demonstration approach consistent with the EPA's Guideline on Air Quality Models. Specifically, the applicant used a Tier 1 demonstration tool developed by the EPA referred to as Modeled Emission Rates for Precursors (MERPs). The basic idea behind the MERPs is to use technically credible air quality modeling to relate precursor emissions and peak secondary pollutants impacts from a source. Using data associated with the worst-case source, the applicant estimated 24-hr and annual secondary PM_{2.5} concentrations of 0.0001 µg/m³ and <0.0001 µg/m³, respectively. When these estimates are added to the GLCmax listed in the table above, the results are less than the De Minimis levels.

Table 2. Minor NSR Site-wide Modeling Results for Health Effects

Pollutant	CAS#	Averaging Time	GLCmax (µg/m ³)	GLCmax Location	GLCni (µg/m ³)	GLCni Location
hydrogen fluoride	7664-39-3	1-hr	6	-	<6	-
hydrogen fluoride For air permit reviews in agricultural areas	7664-39-3	1-hr	3.9	Eastern Property Line	-	-
hydrogen fluoride For air permit reviews in agricultural areas with cattle	7664-39-3	Annual	0.3	-	-	-
fluorine	7782-41-4	1-hr	3.9	Western Property Line	3.9	Western Property Line
perfluoroheptane	335-57-9	1-hr	22	-	<22	-
methanol	67-56-1	1-hr	38	-	<38	-
perfluorooctanoic acid and its inorganic salts	335-67-1	1-hr	<0.01	-	<0.01	-
bromine	7726-95-6	1-hr	5	-	<5	-
hydrogen chloride	7647-01-0	1-hr	4	-	<4	-

¹ www.tceq.texas.gov/assets/public/permitting/air/memos/guidance_1hr_no2naaqs.pdf

² www.tceq.texas.gov/permitting/air/modeling/epa-mod-guidance.html

TCEQ Interoffice Memorandum

hydrogen chloride	7647-01-0	Annual	0.1	-	<0.1	-	7.9
carbon tetrafluoride	75-73-0	1-hr	154		<154	-	18000
Perfluoro (bis-2-chloroethoxy methane)	Not found	1-hr	7	-	<7	-	200
Perfluorodecalin	306-94-5	1-hr	22	-	<22	-	200
polymers of chlorotrifluoroethylene (PCTFE)	9002-83-9	1-hr	17	-	<17	-	50
carbonyl fluoride For air permit reviews in agricultural areas with cattle	353-50-4	Annual	0.03	-	<0.03	-	0.71
trifluoroacetic acid For air permit reviews in agricultural areas with cattle	76-05-1	Annual	0.03	-	<0.03	-	0.71

Table 3. Minor NSR Hours of Exceedance for Health Effects

Pollutant	Averaging Time	1 X ESL GLCni
fluorine	1-hr	99

For fluorine, the GLCmax and the GLCni are the same. Pollutant-specific modeling was conducted for fluorine and 1-hr hydrogen fluoride at agricultural areas. For all other pollutants and averaging times, generic modeling was used; refer to section 3 for more details on the generic modeling.

TCEQ Interoffice Memorandum

3. Model Used and Modeling Techniques

AERMOD (Version 21112) was used in a refined screening mode.

A unitized emission rate of 1 lb/hr was used to predict a generic short-term and long-term impact for each source. The generic impact was multiplied by the proposed pollutant specific emission rates to calculate a maximum predicted concentration for each source. The maximum predicted concentration for each source was summed to get a total predicted concentration for each pollutant. Pollutant-specific modeling was conducted for fluorine and 1-hr hydrogen fluoride at agricultural areas.

A. Land Use

Medium roughness and elevated terrain were used in the modeling analysis. These selections are consistent with the AERSURFACE analysis, topographic map, DEMs, and aerial photography. The selection of medium roughness is reasonable.

B. Meteorological Data

Surface Station and ID: Austin, TX (Station #: 13904)
Upper Air Station and ID: Fort Worth, TX (Station #: 3990)
Meteorological Dataset: 2016
Profile Base Elevation: 150.9 meters

C. Receptor Grid

The grid modeled was sufficient in density and spatial coverage to capture representative maximum ground-level concentrations.

D. Building Wake Effects (Downwash)

Input data to Building Profile Input Program Prime (Version 04274) are consistent with the aerial photography, plot plan, and modeling report.

4. Modeling Emissions Inventory

The modeled emission point and volume source parameters and rates were consistent with the modeling report. The source characterizations used to represent the sources were appropriate.

The applicant assumed full conversion of NO_x to NO₂, which is conservative.

Maximum allowable hourly emission rates were used for the short-term averaging time analyses, and annual average emission rates were used for the annual averaging time analyses.



Compliance History Report

Compliance History Report for CN602696791, RN110969227, Rating Year 2021 which includes Compliance History (CH) components from September 1, 2016, through August 31, 2021.

Customer, Respondent, or Owner/Operator:	CN602696791, Exflur Research Corporation	Classification: UNCLASSIFIED	Rating: -----
Regulated Entity:	RN110969227, EXFLUOR RESEARCH	Classification: UNCLASSIFIED	Rating: -----
Complexity Points:	5	Repeat Violator: NO	
CH Group:	05 - Chemical Manufacturing		
Location:	1100 CR 236 FLORENCE, TX 76527, WILLIAMSON COUNTY		
TCEQ Region:	REGION 11 - AUSTIN		
ID Number(s):			
AIR NEW SOURCE PERMITS	PERMIT 165848	EDWARDS AQUIFER PERMIT	11003164
WASTEWATER PERMIT	WQG100041		
Compliance History Period:	September 01, 2016 to August 31, 2021	Rating Year: 2021	Rating Date: 09/01/2021
Date Compliance History Report Prepared:	November 17, 2022		
Agency Decision Requiring Compliance History:	Enforcement		
Component Period Selected:	September 09, 2016 to September 09, 2021		
TCEQ Staff Member to Contact for Additional Information Regarding This Compliance History.			
Name:	TCEQ Staff Member	Phone:	(512) 239-1000

Site and Owner/Operator History:

- 1) Has the site been in existence and/or operation for the full five year compliance period? NO
- 2) Has there been a (known) change in ownership/operator of the site during the compliance period? NO

Components (Multimedia) for the Site Are Listed in Sections A - J

A. Final Orders, court judgments, and consent decrees:

N/A

B. Criminal convictions:

N/A

C. Chronic excessive emissions events:

N/A

D. The approval dates of investigations (CCEDS Inv. Track. No.):

N/A

E. Written notices of violations (NOV) (CCEDS Inv. Track. No.):

A notice of violation represents a written allegation of a violation of a specific regulatory requirement from the commission to a regulated entity. A notice of violation is not a final enforcement action, nor proof that a violation has actually occurred.

N/A

F. Environmental audits:

N/A

G. Type of environmental management systems (EMSs):

N/A

H. Voluntary on-site compliance assessment dates:

N/A

I. Participation in a voluntary pollution reduction program:

N/A

J. Early compliance:

N/A

Sites Outside of Texas:

N/A

Application Exhibit 39

Shannon White-Shubert Reply

Marielle Bascon

From: swshubert@gmail.com
Sent: Monday, November 21, 2022 4:46 PM
To: PUBCOMMENT-OCC
Subject: Public comment on Permit Number 165848
Attachments: Xerox Scan_06092022183106[5895]1.pdf

REGULATED ENTY NAME EXFLUOR RESEARCH

RN NUMBER: RN110969227

PERMIT NUMBER: 165848

DOCKET NUMBER: 2022-1552-AIR

COUNTY: WILLIAMSON

PRINCIPAL NAME: EXFLUOR RESEARCH CORPORATION

CN NUMBER: CN602696791

FROM

NAME: Shannon White-Shubert

EMAIL: swshubert@gmail.com

COMPANY:

**ADDRESS: 3404 CORTINA LN
ROUND ROCK TX 78681-2417**

PHONE: 5124875976

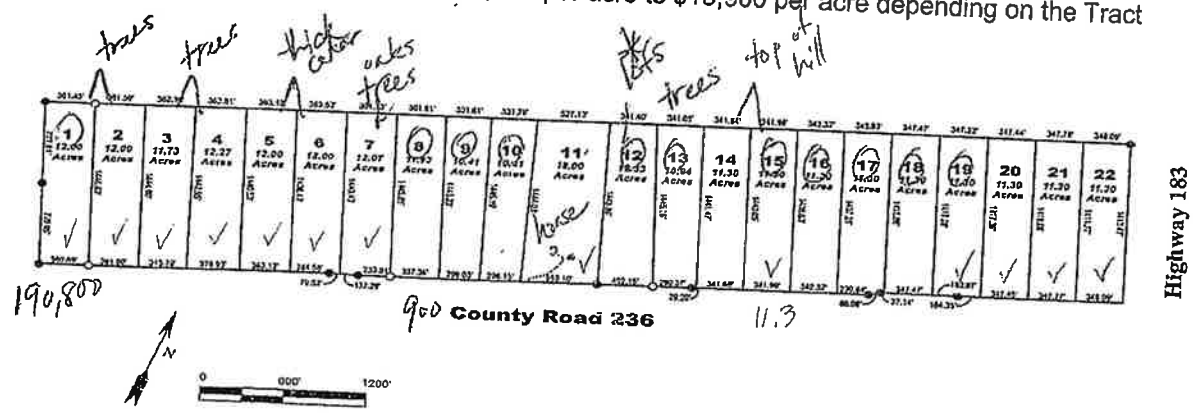
FAX:

COMMENTS: This is the flyer used by County Road 236 Investments, LLC. The property was marketed as ranches and it was sold primarily as Single Family Residential Property. This document does not refer to commercial property nor does it offer any property to be used in an industrial or manufacturing setting.

236 Ranches Williamson County 10 - 18 Acre Tracts

FYI
incorporated
08-05-2019

- Location:** The Property is located just west of the intersection of Hwy 183 North and County Road 236 in Williamson County, 8 - 9 minutes north (9.9 miles) of Hwy 29.
- Access:** All Tracts have direct access to County Road 236. No flag lots.
- Sizes Available:** 10 to 18 acre Tracts are available
- Topography:** Generally level terrain with good soil and grass cover. Some areas have open pasture with small scattered cedars while several areas include extensive live oak, post oak and brush. Long views are available from several of the Tracts.
- Utilities:** Pedernales Electric Coop (on CR 236), private water wells, on-site septic systems will be required
- School District:** Florence ISD
- Taxes:** Agricultural exemption in place
- Restrictions:** Reasonable restrictions are in place. Ask for a copy.
- Prices:** Range from \$11,900 per acre to \$15,900 per acre depending on the Tract



Contact:
Clay Morgan (512) 517-2557
Stewart Pate (512) 748-9715

The information contained herein has been obtained from reliable sources, and we have no reason to doubt the accuracy of such information; however, no warranty or guarantee, either implied or expressed, is made with respect to the accuracy thereof. All such information is submitted subject to errors, omissions, or changes in conditions including the presence of any hazardous materials or any other environmental conditions that may affect the value or suitability of the property. All information contained herein should be verified to the satisfaction of the person relying on it.

2021 22

567

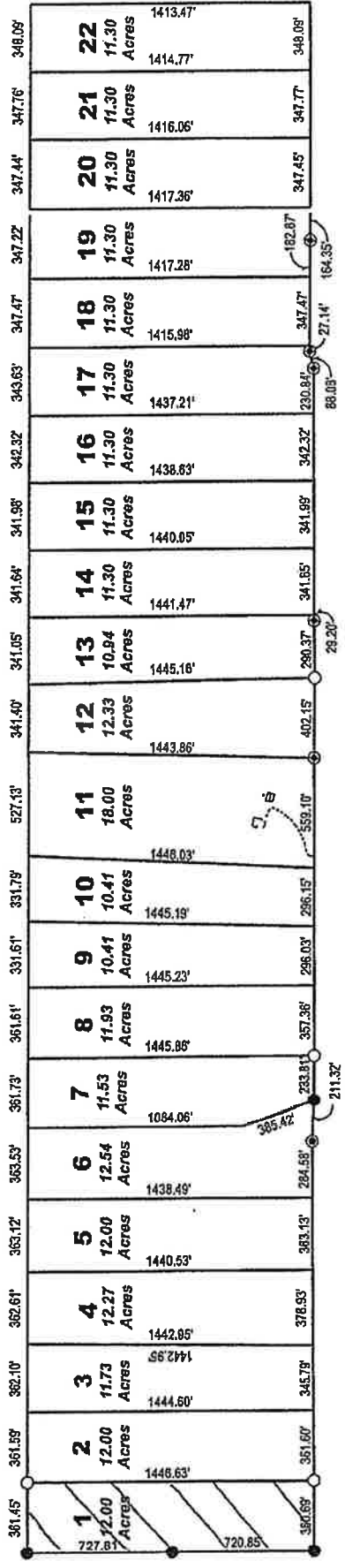
4

2

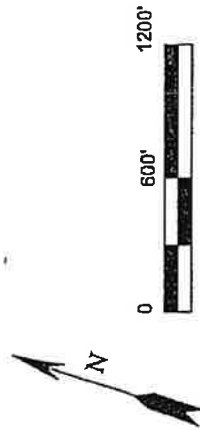
3

179
381
179

Exhibit A



County Road 236



Marielle Bascon

From: swshubert@gmail.com
Sent: Monday, November 21, 2022 3:59 PM
To: PUBCOMMENT-OCC
Subject: Public comment on Permit Number 165848

REGULATED ENTY NAME EXFLUOR RESEARCH

RN NUMBER: RN110969227

PERMIT NUMBER: 165848

DOCKET NUMBER: 2022-1552-AIR

COUNTY: WILLIAMSON

PRINCIPAL NAME: EXFLUOR RESEARCH CORPORATION

CN NUMBER: CN602696791

FROM

NAME: Shannon White-Shubert

EMAIL: swshubert@gmail.com

COMPANY:

ADDRESS: 3404 CORTINA LN
ROUND ROCK TX 78681-2417

PHONE: 5124875976

FAX:

COMMENTS: Two years after purchasing our property - Mike, myself and many of our neighbors were shocked to find out that three of the neighboring tracts sold to Exflur were granted special permission to build a specialty chemical manufacturing facility from CR236 INV, the realtors representing the Texas A&M Foundation. For me, this has been especially difficult because one of the realtors involved was my 'friend' from my hometown, La Grange. I reached out to Clay to ask for help in April of this year after learning about Exflur's plans. First he stated that he didn't know anything about it and that he would have to look into it. Clay then ignored me for over a month and then finally he sent me a text me stating "I don't see how we can. We specifically said they could in their restrictions. In hindsight it was a mistake but to try to change it now would just invite a lawsuit that we would lose." Feeling helpless I reached out to ask Clay for help again recently through text messages. I asked him why he didn't tell me about the chemical plant -- as my friend. He replied via text stating "You didn't ask and we didn't and still don't think it's a big deal. It clearly has not effected the property value and I have offered to buy you out as has the warehouse guy. I don't own a single property where I am happy with all of my neighbors. You are not damaged. It is a great investment. Keep it or sell it and buy where you can dictate the uses around you. And we are friends. If you were harmed I would make it right but you are not." According to my 'friend' it was not our decision to make about whether or not we would want to live in the close vicinity of the

specialty chemical manufacturing facility. Clay said he didn't tell me because I didn't ask. But I did ask. So did my husband, Mike. And so did several of our neighbors who bought a tract from CR236 INV. Please note that Clay stated that "they didn't and still don't think it is a big deal" referring to the specialty chemical manufacturing facility to be built by Exflur. Please keep in mind that these comments were made in a text by a realtor (a partner in County Road 236 Investments, LLC) who represented the Texas A&M Foundation in this transaction. This is who we are dealing with. And this is exactly why we are in this situation. If the TCEQ does not step up and help us – who will? Please consider this. I believe that Clay's comments are very important. The CCRs used by CR236 INV state under Uses that "No use can conflict with Paragraph 1.10 herein." Paragraph 1.10 is titled Nuisances. It states: "No noxious, noisy, offensive, undesirable, unlawful or immoral activity shall be conducted on any tract, nor shall anything be done or permitted to be done thereon which may be or become a nuisance or annoyance to the owners of the adjacent tracts. Any determination by the Declarant that an activity is noxious, noisy, offensive, undesirable or immoral shall be final and binding on all parties." My neighbors and I believe that the proposed permit number 165848 for Exflur conflicts directly with the Nuisance Clause in the CCRs because the proposed facility would emit the following contaminants: carbon monoxide, hydrogen fluorides, hazardous air pollutants, nitrogen oxide, organic compounds and particulate matter including particulate matter with diameters of 10 microns or less and 2.5 microns or less. Per US Legal a nuisance is "a substantial interference with the right to use and enjoy land, which may be intentional, negligent or ultra-hazardous in origin, and must be a result of the defendant's activity." Ultra-hazardous is the key here. Again, we bought property marketed and sold as ranches for Single Family Residential Use. Exflur's specialty chemical manufacturing facility DOES NOT BELONG among property sold primarily for use as Single Family Residential property. I doubt that my 'friend' Clay Morgan and his partner, Stewart Pate, are going to help us. Instead I plan to seek the help of all seven of the Trustees from the Texas A&M Foundation and from John Sharp who has served as the Chancellor of the Texas A&M University System since 2011. I will ask the Foundation for an investigation so that this does not happen again. We deserve nothing less from a foundation whose vision is to be among the most trusted philanthropies in higher education. In addition, I have a letter with supporting documentation prepared for Williamson County District Attorney Shawn Dick asking for an investigation as well. I firmly believe that a little sunshine is desperately needed here. It should be noted again that NONE of my neighbors who purchased from County Road 236 Investments, LLC would have purchased their property if they had known about the specialty chemical manufacturing facility. We all feel deceived. I'm not giving up on our dream to build our forever home and live happily-ever-after on our beautiful property in Florence. Our property is far too valuable not to fight for it. "I might only have one match but I can make an explosion." Those are just lyrics in a song but they are very relevant to me. A specialty chemical manufacturing facility does NOT belong in a rural community of single family residential/agricultural properties where there will be less regulation and oversight. This is a serious moral and ethical issue. It should be noted that Dr. Box is also an "affected person" as he lives close to the 259.78 acres he donated. It is a disgrace that the Texas A&M Foundation has allowed this to happen. In addition to the issues related to disclosure of the specialty chemical manufacturing facility --- County Road 236, Florence, the location itself, is not equipped to serve industrial or chemical manufacturing needs because the utilities in this rural area are unreliable and scarce. There is inadequate water and no sewer available. All nearby properties use well water. There is no natural gas available. Power outages are common in this area. And the most serious issue is that we do not have a fire department or an emergency response team nearby that can handle the type of Hazardous Materials that Exflur works with or manufactures. This rural community is not equipped for a "specialty chemical manufacturing facility." The nearest fire department is a volunteer fire department in Andice, Texas (population 25). The nearest Level 1 Trauma Center is 40 miles away. The nearest Level 2 Trauma Center is 25 miles away. I firmly believe that building a "specialty chemical manufacturing facility" in a rural community like Florence is a very serious moral and ethical issue. I believe it is simply ludicrous that anyone would ignore our concerns. Per the Williamson County Appraisal District there are seven properties raising bees in this community (including us). Potentially, this means that as many as 70 hives will be exposed to Exflur's evaporation pond which will not be covered. We cannot risk this. Our honey will most certainly be contaminated. Please do the right thing for the residents, our pets, our bees and our beautiful trees and DO NOT APPROVE THIS PERMIT. Thank you again for the opportunity to comment on Permit no. 165848 filed by Exflur Research Corporation. My husband, Mike and I strongly believe that there are critical health and environmental concerns associated with Exflur's proposed "specialty chemical manufacturing facility" risking toxic gas releases and chemical spills, as well as 24/7 manufacturing activities. We ask you to honor your commitment to Take Care of Texas, especially our beautiful land in Florence. One last comment about how special our property is. The enormous Texas Red Oaks thriving throughout our property are currently in the seasonal color change. It is truly a sight to behold and unlike other

parts of Williamson County. We have a forest of beautiful trees both deciduous and evergreen. This land really is very special. I believe that the abundance of our Little Brown Skinks proves this.

Marielle Bascon

From: swshubert@gmail.com
Sent: Monday, November 21, 2022 3:48 PM
To: PUBCOMMENT-OCC
Subject: Public comment on Permit Number 165848

REGULATED ENTY NAME EXFLUOR RESEARCH

RN NUMBER: RN110969227

PERMIT NUMBER: 165848

DOCKET NUMBER: 2022-1552-AIR

COUNTY: WILLIAMSON

PRINCIPAL NAME: EXFLUOR RESEARCH CORPORATION

CN NUMBER: CN602696791

FROM

NAME: Shannon White-Shubert

EMAIL: swshubert@gmail.com

COMPANY:

ADDRESS: 3404 CORTINA LN
ROUND ROCK TX 78681-2417

PHONE: 5124875976

FAX:

COMMENTS: My name is Shannon White-Shubert, 3404 Cortina Lane, Round Rock, Texas 78681, (512)487-5976 home phone or (512)633-9481 cell. My husband, Mike, and I own 12 beautiful acres located at 1500 CR 236 in Florence, Williamson County, Texas. Our property is located 1,086 feet downhill and to the west of Exflur Research Corporation's property where the proposed "specialty chemical manufacturing facility" will be located. We share an abundance of springs which convey excess ground water to the land surface between our heavily treed properties. I strongly disagree with the executive director's decision to approve NSR Permit no. 165848 for Exflur Research Corporation. I request reconsideration of the executive director's decision and I request a contested case hearing. My husband, Mike and I are "affected persons." This request is made for myself and my husband, Mike, as owners of the property located at 1500 CR 236, Florence, Texas. Previously, under Comment 1: Public Notice/Comment Period it was stated that I, Shannon White-Shubert, expressed concern that existing property owners were not notified when the Applicant purchased land for the facility. That is not what I stated. I was not referring to existing neighbors. Nor was I referring to a notification given when Exflur purchased their land for the specialty chemical manufacturing facility. In addition, the response from the Executive Director referred to the public notice, as required by TCEQ rules in Chapter 39 (Public Notice) in accordance with statutory requirements. That is not what I was referring to either. I'm referring specifically to the notice that would

have been given when someone purchases property from another person. In this specific situation I am referring the notice which should have been given by the realtors known as County Road 236 Investments, LLC (CR236 INV) who represented the Texas A&M Foundation. I argue THAT would have been the appropriate time to decide whether or not you wanted to live with your family near a specialty chemical manufacturing facility. Mike and I should have been able to make that decision before buying our property since Exflur had already purchased their tracts and Exflur had already been granted permission to build a specialty chemical manufacturing facility in the CCRs written by CR236 INV. These specific "affected persons" which I refer to are the neighbors who purchased a tract among the 259.78 acres on County Road 236 in Florence which was placed in a charitable remainder unitrust for "Love of, and appreciation for Texas A&M University, its purposes, its students, and its importance to the Grantor." The 259.78 acres were surveyed into 22 tracts consisting of 10-18 acres, which were marketed and sold as ranches for Single Family Residential Use. There are no documents filed with Williamson County which establish this property or community as a planned unit development (PUD) or any type of development. There is no subdivision code or subdivision name. No HOA was formed. The property was not developed. The realtors do not refer to themselves as developers only as the declarant on the CCRs. The CCRs were written for each individual property and not for the community-at-large although the CCRs state that they were written "for the purpose of carrying out a uniform plan" and they often imply a community interest. The proceeds from selling the 259.78 acres were gifted into a charitable remainder unitrust for the Texas A&M Foundation. To be perfectly clear --- I am concerned that NO ONE was informed that Exflur was granted permission by CR236 INV to build a specialty chemical manufacturing facility on Lots #5, 6, & 7 located among the 259.78 acres marketed and sold as "ranches" for Single Family Residential Use. AND I am concerned that NONE of my neighbors who purchased property from CR236 INV would have purchased their property if they had known about the specialty chemical manufacturing facility. As I have stated previously this land (totaling 259.78 acres) was donated by Dr. Richard A. Box, a lifelong Aggie who ended his career serving on the Board of Regents from 2008-2013, including serving as chairman from 2011-2013. Dr. Box became inducted into the Corp of Cadets Hall of Honor in April of 2018. Dr. Box is salt of the Earth and his legacy should be honored. My husband Mike found our property in November of 2019 exactly three years ago to this day. We felt extremely blessed. In January of 2020 we purchased Lot #1 which was a part of the 259.78 acres donated to the Texas A&M Foundation. Again, to be perfectly clear, every tract sold, meaning all of the 259.78 acres was marketed as "ranches" for Single Family Residences. None of the property was marketed for use as commercial property or as property for industrial or manufacturing uses. Again, I firmly believe that we should have been able to make the decision about whether or not we wanted to live near a specialty chemical manufacturing facility before we purchased our property. That information should have been disclosed or at least been easily accessible. But it was not. The Warranty Deed for Exflur dated 12/13/2019 refers to "restrictions and covenants, including those recorded in Document Number 2019116579, Official Public Records of Williamson County on November 25, 2019." This document number does not state anything about a specialty chemical manufacturing facility. Document Number 2019116579 is the CCR for Lot #4 consisting of 12.27 acres presently owned by Kyle and Shannon Gehrler. The CCR for Exflur is recorded as Document Number 2019113872 in the Official Public Records dated 11/25/2019. This is the only CCR which states that light commercial and light industrial/manufacturing is an approved use for the property in this community and it is NOT directly linked to Exflur's Warranty Deed. Was this an attempt to deceive? Perhaps so. (Part 1 of 2)

Marielle Bascon

From: swshubert@gmail.com
Sent: Monday, November 21, 2022 5:00 PM
To: PUBCOMMENT-OCC
Subject: Public comment on Permit Number 165848

REGULATED ENTY NAME EXFLUOR RESEARCH

RN NUMBER: RN110969227

PERMIT NUMBER: 165848

DOCKET NUMBER: 2022-1552-AIR

COUNTY: WILLIAMSON

PRINCIPAL NAME: EXFLUOR RESEARCH CORPORATION

CN NUMBER: CN602696791

FROM

NAME: Shannon White-Shubert

EMAIL: swshubert@gmail.com

COMPANY:

ADDRESS: 3404 CORTINA LN
ROUND ROCK TX 78681-2417

PHONE: 5124875976

FAX:

COMMENTS: Earlier today I accidentally submitted a public comment on Permit Number 165848. It was previously submitted by me and begins by stating "I request a contested case hearing. My name is Shannon White-Shubert." It was submitted around 3:49 PM. Since it was submitted in error, I would like to withdraw the comments made on this particular response, if possible. Please leave the other responses which I made today. Thank you.

Marielle Bascon

From: swshubert@gmail.com
Sent: Monday, November 21, 2022 3:49 PM
To: PUBCOMMENT-OCC
Subject: Public comment on Permit Number 165848

REGULATED ENTITY NAME EXFLUOR RESEARCH

RN NUMBER: RN110969227

PERMIT NUMBER: 165848

DOCKET NUMBER:

COUNTY: WILLIAMSON

PRINCIPAL NAME: EXFLUOR RESEARCH CORPORATION

CN NUMBER: CN602696791

FROM

NAME: Shannon White-Shubert

EMAIL: swshubert@gmail.com

COMPANY:

ADDRESS: 3404 CORTINA LN
ROUND ROCK TX 78681-2417

PHONE: 5126339481

FAX:

COMMENTS: I request a contested case hearing. My name is Shannon White-Shubert, 3404 Cortina Lane, Round Rock, Texas 78681, (512)487-5976 home phone or (512)633-9481 cell. My husband, Mike, and I own 12 beautiful acres located at 1500 CR 236 in Florence, Williamson County, Texas. Our property is located 1,086 feet downhill and to the west of Exflur Research Corporation's property where the proposed "specialty chemical manufacturing facility" will be located. I strongly disagree with the executive director's decision to approve NSR Permit no. 165848 for Exflur Research Corporation. I also request reconsideration of the executive director's decision. My husband, Mike and I are "affected persons." This request is made for myself and my husband, Mike, as owners of the property located at 1500 CR 236, Florence, Texas. We are concerned for our health and the health of our pets, our bees and our beautiful trees. We strongly believe that there are critical health and environmental concerns associated with Exflur's proposed "specialty manufacturing chemical facility." The land we purchased in January of 2020 was a part of the 259.78 acres donated to the Texas A&M Foundation by Dr. Richard A. Box, a lifelong Aggie. The land was surveyed into 22 tracts consisting of 10-18 acres. It was sold by County Road 236 Investments, LLC and marketed as "ranches" with an agricultural exemption in place. Two years later we were shocked to find out that three of the tracts were sold to Exflur Research Corporation and that they were granted permission from County Road 236 Investments, LLC to build a "specialty chemical

manufacturing facility." A "specialty chemical manufacturing facility" does NOT belong in a rural community of single family residential/agricultural properties where there will be less regulation and oversight. This is a serious moral and ethical issue. How the Texas A&M Foundation allowed this to happen is beyond me. It should be noted that Dr. Box is also an "affected person" as he lives in the area. NONE of my neighbors who purchased from County Road 236 Investments, LLC would have purchased their property if they had known about the proposed chemical plant. We all feel deceived. This is fraud. "Fraud consists of some deceitful practice or willful device resorted to with intent to deprive another of his right." We also firmly believe that this particular "use" for Exflur's property conflicts with Paragraph 1.10 - the Nuisance paragraph in our Restrictions. Per US Legal a nuisance is "a substantial interference with the right to use and enjoy land, which may be intentional, negligent or ultra-hazardous in origin, and must be a result of the defendant's activity." Ultra-hazardous is the key here. Some of the chemicals Exflur works with are perfluorocarbons; they are called "forever chemicals" due to the fact that they are extremely stable. They do not break down in the environment. Their life cycles can last from 10K to 50K years! Forever chemicals have been in the news a lot recently which makes me ask why is this permit even being considered for approval given the hazardous nature of forever chemicals? Per the Williamson County Appraisal District there are seven properties raising bees in this community (including us). Potentially, this means that as many as 70 hives will be exposed to Exflur's evaporation pond which will not be covered. We cannot risk this. It is most certain that our honey will be contaminated. In addition, County Road 236, Florence, the location itself, is not equipped to serve industrial or chemical manufacturing needs because the utilities in this rural area are unreliable and scarce. There is inadequate water and no sewer available. All nearby properties use well water. There is no natural gas available. Power outages are common in this area. And the most serious issue is that we do not have a fire department or an emergency response team nearby that can handle the type of Hazardous Materials that Exflur works with or manufactures. This rural community is not equipped for a "specialty chemical manufacturing facility." The nearest fire department is a volunteer fire department in Andice (population 25). The nearest Level 1 Trauma Center is 40 miles away. The nearest Level 2 Trauma Center is 25 miles away. I firmly believe that building a "specialty chemical manufacturing facility" in a rural community like Florence is a very serious moral and ethical issue. I believe it is simply ludicrous that anyone would ignore our concerns. Again, we strongly believe that there are critical health and environmental concerns associated with Exflur's proposed "specialty chemical manufacturing facility" risking toxic gas releases and chemical spills, as well as 24/7 manufacturing activities. Please do the right thing for the residents, our animals and the livestock in our community and do not approve this permit.

Marielle Bascon

From: swshubert@gmail.com
Sent: Monday, November 21, 2022 4:46 PM
To: PUBCOMMENT-OCC
Subject: Public comment on Permit Number 165848
Attachments: Xerox Scan_06092022183106[5895]1.pdf

REGULATED ENTY NAME EXFLUOR RESEARCH

RN NUMBER: RN110969227

PERMIT NUMBER: 165848

DOCKET NUMBER: 2022-1552-AIR

COUNTY: WILLIAMSON

PRINCIPAL NAME: EXFLUOR RESEARCH CORPORATION

CN NUMBER: CN602696791

FROM

NAME: Shannon White-Shubert

EMAIL: swshubert@gmail.com

COMPANY:

ADDRESS: 3404 CORTINA LN
ROUND ROCK TX 78681-2417

PHONE: 5124875976

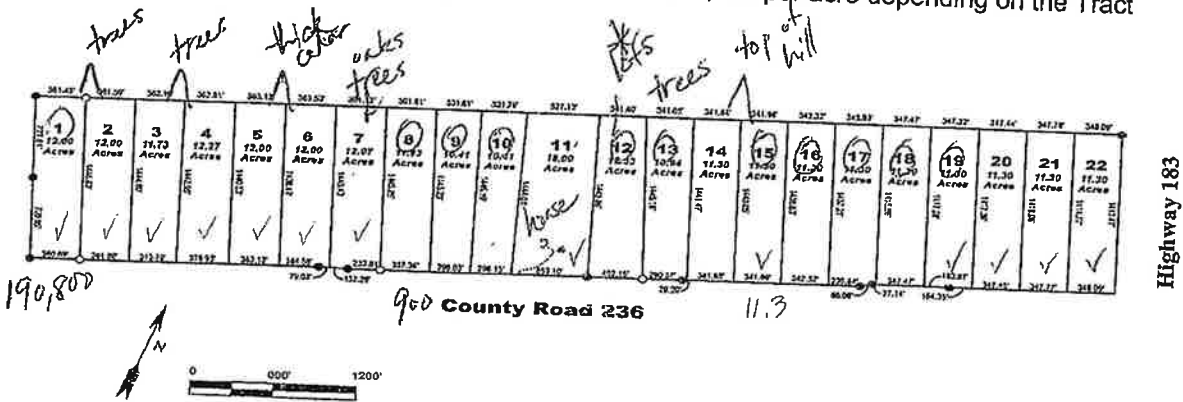
FAX:

COMMENTS: This is the flyer used by County Road 236 Investments, LLC. The property was marketed as ranches and it was sold primarily as Single Family Residential Property. This document does not refer to commercial property nor does it offer any property to be used in an industrial or manufacturing setting.

236 Ranches Williamson County 10 - 18 Acre Tracts

*FYI
incorporated
08-05-2019*

- Location:** The Property is located just west of the intersection of Hwy 183 North and County Road 236 in Williamson County, 8 - 9 minutes north (9.9 miles) of Hwy 29.
- Access:** All Tracts have direct access to County Road 236. No flag lots.
- Sizes Available:** 10 to 18 acre Tracts are available
- Topography:** Generally level terrain with good soil and grass cover. Some areas have open pasture with small scattered cedars while several areas include extensive live oak, post oak and brush. Long views are available from several of the Tracts.
- Utilities:** Pedernales Electric Coop (on CR 236), private water wells, on-site septic systems will be required
- School District:** Florence ISD
- Taxes:** Agricultural exemption in place
- Restrictions:** Reasonable restrictions are in place. Ask for a copy.
- Prices:** Range from \$11,900 per acre to \$15,900 per acre depending on the Tract



Contact: Clay Morgan (512) 517-2557
Stewart Pate (512) 748-9715

The information contained herein has been obtained from reliable sources, and we have no reason to doubt the accuracy of such information; however, no warranty or guarantee, either implied or expressed, is made with respect to the accuracy thereof. All such information is submitted subject to errors, omissions, or changes in conditions including the presence of any hazardous materials or any other environmental conditions that may affect the value or suitability of the property. All information contained herein should be verified to the satisfaction of the person relying on it.

2021 22

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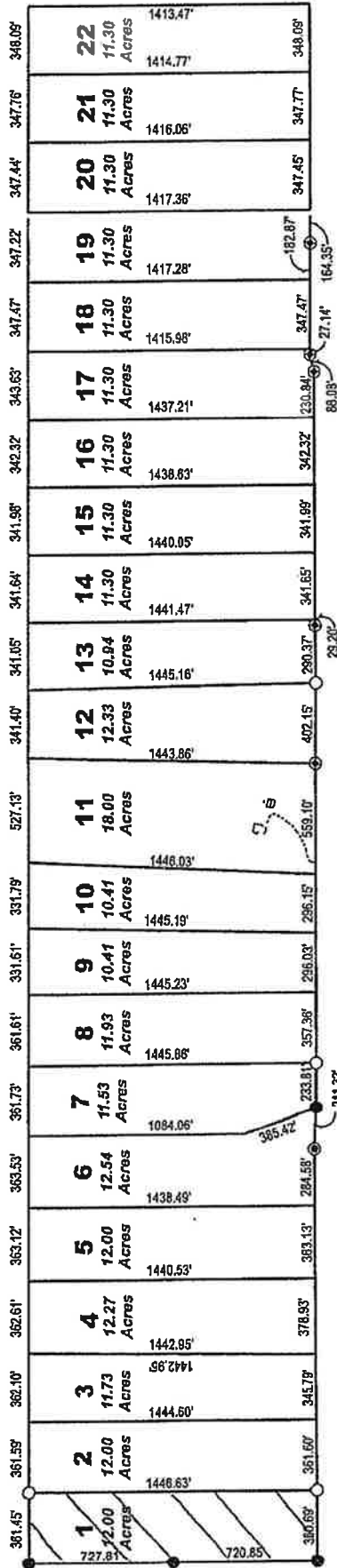
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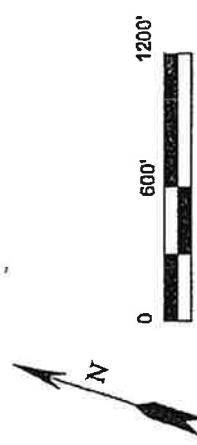
3

1.47
381
179

Exhibit A



County Road 236



Marielle Bascon

From: swshubert@gmail.com
Sent: Monday, November 21, 2022 3:59 PM
To: PUBCOMMENT-OCC
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COMPANY:

**ADDRESS: 3404 CORTINA LN
ROUND ROCK TX 78681-2417**

PHONE: 5124875976

FAX:

COMMENTS: Two years after purchasing our property - Mike, myself and many of our neighbors were shocked to find out that three of the neighboring tracts sold to Exflur were granted special permission to build a specialty chemical manufacturing facility from CR236 INV, the realtors representing the Texas A&M Foundation. For me, this has been especially difficult because one of the realtors involved was my 'friend' from my hometown, La Grange. I reached out to Clay to ask for help in April of this year after learning about Exflur's plans. First he stated that he didn't know anything about it and that he would have to look into it. Clay then ignored me for over a month and then finally he sent me a text me stating "I don't see how we can. We specifically said they could in their restrictions. In hindsight it was a mistake but to try to change it now would just invite a lawsuit that we would lose." Feeling helpless I reached out to ask Clay for help again recently through text messages. I asked him why he didn't tell me about the chemical plant -- as my friend. He replied via text stating "You didn't ask and we didn't and still don't think it's a big deal. It clearly has not effected the property value and I have offered to buy you out as has the warehouse guy. I don't own a single property where I am happy with all of my neighbors. You are not damaged. It is a great investment. Keep it or sell it and buy where you can dictate the uses around you. And we are friends. If you were harmed I would make it right but you are not." According to my 'friend' it was not our decision to make about whether or not we would want to live in the close vicinity of the

specialty chemical manufacturing facility. Clay said he didn't tell me because I didn't ask. But I did ask. So did my husband, Mike. And so did several of our neighbors who bought a tract from CR236 INV. Please note that Clay stated that "they didn't and still don't think it is a big deal" referring to the specialty chemical manufacturing facility to be built by Exflur. Please keep in mind that these comments were made in a text by a realtor (a partner in County Road 236 Investments, LLC) who represented the Texas A&M Foundation in this transaction. This is who we are dealing with. And this is exactly why we are in this situation. If the TCEQ does not step up and help us – who will? Please consider this. I believe that Clay's comments are very important. The CCRs used by CR236 INV state under Uses that "No use can conflict with Paragraph 1.10 herein." Paragraph 1.10 is titled Nuisances. It states: "No noxious, noisy, offensive, undesirable, unlawful or immoral activity shall be conducted on any tract, nor shall anything be done or permitted to be done thereon which may be or become a nuisance or annoyance to the owners of the adjacent tracts. Any determination by the Declarant that an activity is noxious, noisy, offensive, undesirable or immoral shall be final and binding on all parties." My neighbors and I believe that the proposed permit number 165848 for Exflur conflicts directly with the Nuisance Clause in the CCRs because the proposed facility would emit the following contaminants: carbon monoxide, hydrogen fluorides, hazardous air pollutants, nitrogen oxide, organic compounds and particulate matter including particulate matter with diameters of 10 microns or less and 2.5 microns or less. Per US Legal a nuisance is "a substantial interference with the right to use and enjoy land, which may be intentional, negligent or ultra-hazardous in origin, and must be a result of the defendant's activity." Ultra-hazardous is the key here. Again, we bought property marketed and sold as ranches for Single Family Residential Use. Exflur's specialty chemical manufacturing facility DOES NOT BELONG among property sold primarily for use as Single Family Residential property. I doubt that my "friend" Clay Morgan and his partner, Stewart Pate, are going to help us. Instead I plan to seek the help of all seven of the Trustees from the Texas A&M Foundation and from John Sharp who has served as the Chancellor of the Texas A&M University System since 2011. I will ask the Foundation for an investigation so that this does not happen again. We deserve nothing less from a foundation whose vision is to be among the most trusted philanthropies in higher education. 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It should be noted that Dr. Box is also an "affected person" as he lives close to the 259.78 acres he donated. It is a disgrace that the Texas A&M Foundation has allowed this to happen. In addition to the issues related to disclosure of the specialty chemical manufacturing facility --- County Road 236, Florence, the location itself, is not equipped to serve industrial or chemical manufacturing needs because the utilities in this rural area are unreliable and scarce. There is inadequate water and no sewer available. All nearby properties use well water. There is no natural gas available. Power outages are common in this area. And the most serious issue is that we do not have a fire department or an emergency response team nearby that can handle the type of Hazardous Materials that Exflur works with or manufactures. This rural community is not equipped for a "specialty chemical manufacturing facility." The nearest fire department is a volunteer fire department in Andice, Texas (population 25). The nearest Level 1 Trauma Center is 40 miles away. The nearest Level 2 Trauma Center is 25 miles away. I firmly believe that building a "specialty chemical manufacturing facility" in a rural community like Florence is a very serious moral and ethical issue. I believe it is simply ludicrous that anyone would ignore our concerns. Per the Williamson County Appraisal District there are seven properties raising bees in this community (including us). Potentially, this means that as many as 70 hives will be exposed to Exflur's evaporation pond which will not be covered. We cannot risk this. Our honey will most certainly be contaminated. Please do the right thing for the residents, our pets, our bees and our beautiful trees and DO NOT APPROVE THIS PERMIT. Thank you again for the opportunity to comment on Permit no. 165848 filed by Exflur Research Corporation. My husband, Mike and I strongly believe that there are critical health and environmental concerns associated with Exflur's proposed "specialty chemical manufacturing facility" risking toxic gas releases and chemical spills, as well as 24/7 manufacturing activities. We ask you to honor your commitment to Take Care of Texas, especially our beautiful land in Florence. One last comment about how special our property is. The enormous Texas Red Oaks thriving throughout our property are currently in the seasonal color change. It is truly a sight to behold and unlike other

parts of Williamson County. We have a forest of beautiful trees both deciduous and evergreen. This land really is very special. I believe that the abundance of our Little Brown Skinks proves this.

Marielle Bascon

From: swshubert@gmail.com
Sent: Monday, November 21, 2022 3:48 PM
To: PUBCOMMENT-OCC
Subject: Public comment on Permit Number 165848

REGULATED ENTITY NAME EXFLUOR RESEARCH

RN NUMBER: RN110969227

PERMIT NUMBER: 165848

DOCKET NUMBER: 2022-1552-AIR

COUNTY: WILLIAMSON

PRINCIPAL NAME: EXFLUOR RESEARCH CORPORATION

CN NUMBER: CN602696791

FROM

NAME: Shannon White-Shubert

EMAIL: swshubert@gmail.com

COMPANY:

ADDRESS: 3404 CORTINA LN
ROUND ROCK TX 78681-2417

PHONE: 5124875976

FAX:

COMMENTS: My name is Shannon White-Shubert, 3404 Cortina Lane, Round Rock, Texas 78681, (512)487-5976 home phone or (512)633-9481 cell. My husband, Mike, and I own 12 beautiful acres located at 1500 CR 236 in Florence, Williamson County, Texas. Our property is located 1,086 feet downhill and to the west of Exflur Research Corporation's property where the proposed "specialty chemical manufacturing facility" will be located. We share an abundance of springs which convey excess ground water to the land surface between our heavily treed properties. I strongly disagree with the executive director's decision to approve NSR Permit no. 165848 for Exflur Research Corporation. I request reconsideration of the executive director's decision and I request a contested case hearing. My husband, Mike and I are "affected persons." This request is made for myself and my husband, Mike, as owners of the property located at 1500 CR 236, Florence, Texas. Previously, under Comment 1: Public Notice/Comment Period it was stated that I, Shannon White-Shubert, expressed concern that existing property owners were not notified when the Applicant purchased land for the facility. That is not what I stated. I was not referring to existing neighbors. Nor was I referring to a notification given when Exflur purchased their land for the specialty chemical manufacturing facility. In addition, the response from the Executive Director referred to the public notice, as required by TCEQ rules in Chapter 39 (Public Notice) in accordance with statutory requirements. That is not what I was referring to either. I'm referring specifically to the notice that would

have been given when someone purchases property from another person. In this specific situation I am referring the notice which should have been given by the realtors known as County Road 236 Investments, LLC (CR236 INV) who represented the Texas A&M Foundation. I argue THAT would have been the appropriate time to decide whether or not you wanted to live with your family near a specialty chemical manufacturing facility. Mike and I should have been able to make that decision before buying our property since Exfluor had already purchased their tracts and Exfluor had already been granted permission to build a specialty chemical manufacturing facility in the CCRs written by CR236 INV. These specific "affected persons" which I refer to are the neighbors who purchased a tract among the 259.78 acres on County Road 236 in Florence which was placed in a charitable remainder unitrust for "Love of, and appreciation for Texas A&M University, its purposes, its students, and its importance to the Grantor." The 259.78 acres were surveyed into 22 tracts consisting of 10-18 acres, which were marketed and sold as ranches for Single Family Residential Use. There are no documents filed with Williamson County which establish this property or community as a planned unit development (PUD) or any type of development. There is no subdivision code or subdivision name. No HOA was formed. The property was not developed. The realtors do not refer to themselves as developers only as the declarant on the CCRs. The CCRs were written for each individual property and not for the community-at-large although the CCRs state that they were written "for the purpose of carrying out a uniform plan" and they often imply a community interest. The proceeds from selling the 259.78 acres were gifted into a charitable remainder unitrust for the Texas A&M Foundation. To be perfectly clear --- I am concerned that NO ONE was informed that Exfluor was granted permission by CR236 INV to build a specialty chemical manufacturing facility on Lots #5, 6, & 7 located among the 259.78 acres marketed and sold as "ranches" for Single Family Residential Use. AND I am concerned that NONE of my neighbors who purchased property from CR236 INV would have purchased their property if they had known about the specialty chemical manufacturing facility. As I have stated previously this land (totaling 259.78 acres) was donated by Dr. Richard A. Box, a lifelong Aggie who ended his career serving on the Board of Regents from 2008-2013, including serving as chairman from 2011-2013. Dr. Box became inducted into the Corp of Cadets Hall of Honor in April of 2018. Dr. Box is salt of the Earth and his legacy should be honored. My husband Mike found our property in November of 2019 exactly three years ago to this day. We felt extremely blessed. In January of 2020 we purchased Lot #1 which was a part of the 259.78 acres donated to the Texas A&M Foundation. Again, to be perfectly clear, every tract sold, meaning all of the 259.78 acres was marketed as "ranches" for Single Family Residences. None of the property was marketed for use as commercial property or as property for industrial or manufacturing uses. Again, I firmly believe that we should have been able to make the decision about whether or not we wanted to live near a specialty chemical manufacturing facility before we purchased our property. That information should have been disclosed or at least been easily accessible. But it was not. The Warranty Deed for Exfluor dated 12/13/2019 refers to "restrictions and covenants, including those recorded in Document Number 2019116579, Official Public Records of Williamson County on November 25, 2019." This document number does not state anything about a specialty chemical manufacturing facility. Document Number 2019116579 is the CCR for Lot #4 consisting of 12.27 acres presently owned by Kyle and Shannon Gehrler. The CCR for Exfluor is recorded as Document Number 2019113872 in the Official Public Records dated 11/25/2019. This is the only CCR which states that light commercial and light industrial/manufacturing is an approved use for the property in this community and it is NOT directly linked to Exfluor's Warranty Deed. Was this an attempt to deceive? Perhaps so. (Part 1 of 2)

Marielle Bascon

From: swshubert@gmail.com
Sent: Monday, November 21, 2022 4:46 PM
To: PUBCOMMENT-OCC
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PRINCIPAL NAME: EXFLUOR RESEARCH CORPORATION

CN NUMBER: CN602696791

FROM

NAME: Shannon White-Shubert

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COMPANY:

ADDRESS: 3404 CORTINA LN
ROUND ROCK TX 78681-2417

PHONE: 5124875976

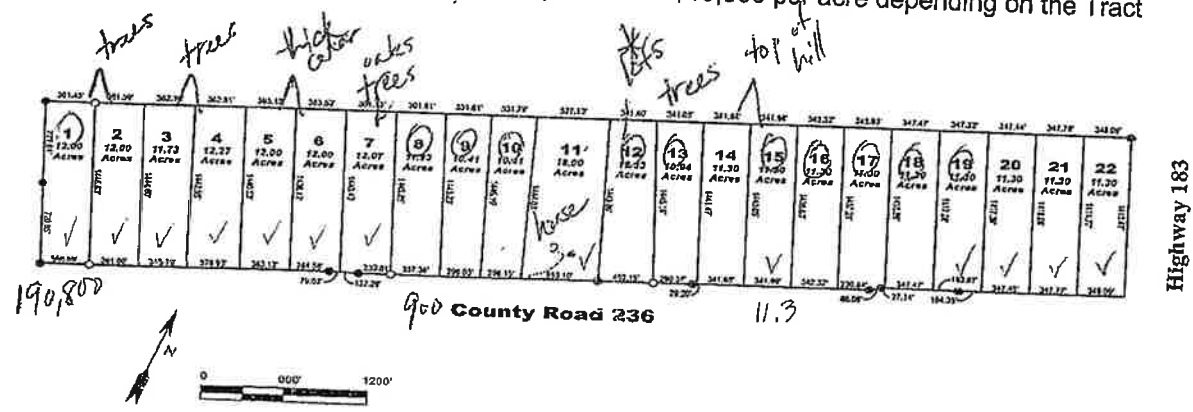
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236 Ranches Williamson County 10 - 18 Acre Tracts

*FYI
incorporated
08-05-2019*

- Location:** The Property is located just west of the intersection of Hwy 183 North and County Road 236 in Williamson County, 8 - 9 minutes north (9.9 miles) of Hwy 29.
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Contact: Clay Morgan (512) 517-2557
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2021 22

567

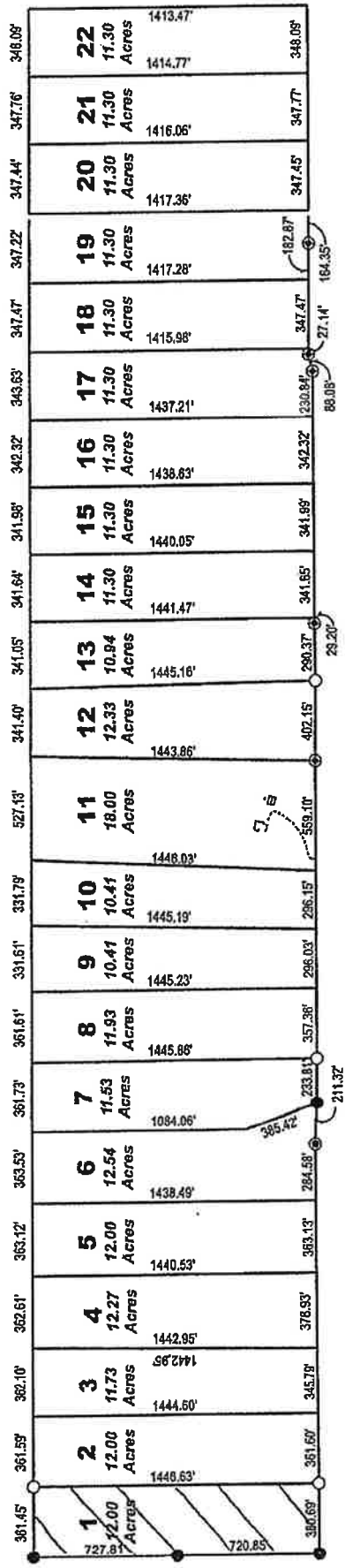
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2

3

179
281
179

Exhibit A



County Road 236



Marielle Bascon

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FAX:

COMMENTS: My name is Shannon White-Shubert, 3404 Cortina Lane, Round Rock, Texas 78681, (512)487-5976 home phone or (512)633-9481 cell. My husband, Mike, and I own 12 beautiful acres located at 1500 CR 236 in Florence, Williamson County, Texas. Our property is located 1,086 feet downhill and to the west of Exflur Research Corporation's property where the proposed "specialty chemical manufacturing facility" will be located. We share an abundance of springs which convey excess ground water to the land surface between our heavily treed properties. I strongly disagree with the executive director's decision to approve NSR Permit no. 165848 for Exflur Research Corporation. I request reconsideration of the executive director's decision and I request a contested case hearing. My husband, Mike and I are "affected persons." This request is made for myself and my husband, Mike, as owners of the property located at 1500 CR 236, Florence, Texas. Previously, under Comment 1: Public Notice/Comment Period it was stated that I, Shannon White-Shubert, expressed concern that existing property owners were not notified when the Applicant purchased land for the facility. That is not what I stated. I was not referring to existing neighbors. Nor was I referring to a notification given when Exflur purchased their land for the specialty chemical manufacturing facility. In addition, the response from the Executive Director referred to the public notice, as required by TCEQ rules in Chapter 39 (Public Notice) in accordance with statutory requirements. That is not what I was referring to either. I'm referring specifically to the notice that would

have been given when someone purchases property from another person. In this specific situation I am referring the notice which should have been given by the realtors known as County Road 236 Investments, LLC (CR236 INV) who represented the Texas A&M Foundation. I argue THAT would have been the appropriate time to decide whether or not you wanted to live with your family near a specialty chemical manufacturing facility. Mike and I should have been able to make that decision before buying our property since Exflur had already purchased their tracts and Exflur had already been granted permission to build a specialty chemical manufacturing facility in the CCRs written by CR236 INV. These specific "affected persons" which I refer to are the neighbors who purchased a tract among the 259.78 acres on County Road 236 in Florence which was placed in a charitable remainder unitrust for "Love of, and appreciation for Texas A&M University, its purposes, its students, and its importance to the Grantor." The 259.78 acres were surveyed into 22 tracts consisting of 10-18 acres, which were marketed and sold as ranches for Single Family Residential Use. There are no documents filed with Williamson County which establish this property or community as a planned unit development (PUD) or any type of development. There is no subdivision code or subdivision name. No HOA was formed. The property was not developed. The realtors do not refer to themselves as developers only as the declarant on the CCRs. The CCRs were written for each individual property and not for the community-at-large although the CCRs state that they were written "for the purpose of carrying out a uniform plan" and they often imply a community interest. The proceeds from selling the 259.78 acres were gifted into a charitable remainder unitrust for the Texas A&M Foundation. To be perfectly clear --- I am concerned that NO ONE was informed that Exflur was granted permission by CR236 INV to build a specialty chemical manufacturing facility on Lots #5, 6, & 7 located among the 259.78 acres marketed and sold as "ranches" for Single Family Residential Use. AND I am concerned that NONE of my neighbors who purchased property from CR236 INV would have purchased their property if they had known about the specialty chemical manufacturing facility. As I have stated previously this land (totaling 259.78 acres) was donated by Dr. Richard A. Box, a lifelong Aggie who ended his career serving on the Board of Regents from 2008-2013, including serving as chairman from 2011-2013. Dr. Box became inducted into the Corp of Cadets Hall of Honor in April of 2018. Dr. Box is salt of the Earth and his legacy should be honored. My husband Mike found our property in November of 2019 exactly three years ago to this day. We felt extremely blessed. In January of 2020 we purchased Lot #1 which was a part of the 259.78 acres donated to the Texas A&M Foundation. Again, to be perfectly clear, every tract sold, meaning all of the 259.78 acres was marketed as "ranches" for Single Family Residences. None of the property was marketed for use as commercial property or as property for industrial or manufacturing uses. Again, I firmly believe that we should have been able to make the decision about whether or not we wanted to live near a specialty chemical manufacturing facility before we purchased our property. That information should have been disclosed or at least been easily accessible. But it was not. The Warranty Deed for Exflur dated 12/13/2019 refers to "restrictions and covenants, including those recorded in Document Number 2019116579, Official Public Records of Williamson County on November 25, 2019." This document number does not state anything about a specialty chemical manufacturing facility. Document Number 2019116579 is the CCR for Lot #4 consisting of 12.27 acres presently owned by Kyle and Shannon Gehrler. The CCR for Exflur is recorded as Document Number 2019113872 in the Official Public Records dated 11/25/2019. This is the only CCR which states that light commercial and light industrial/manufacturing is an approved use for the property in this community and it is NOT directly linked to Exflur's Warranty Deed. Was this an attempt to deceive? Perhaps so. (Part 1 of 2)

Marielle Bascon

From: swshubert@gmail.com
Sent: Monday, November 21, 2022 5:00 PM
To: PUBCOMMENT-OCC
Subject: Public comment on Permit Number 165848

REGULATED ENTY NAME EXFLUOR RESEARCH

RN NUMBER: RN110969227

PERMIT NUMBER: 165848

DOCKET NUMBER: 2022-1552-AIR

COUNTY: WILLIAMSON

PRINCIPAL NAME: EXFLUOR RESEARCH CORPORATION

CN NUMBER: CN602696791

FROM

NAME: Shannon White-Shubert

EMAIL: swshubert@gmail.com

COMPANY:

ADDRESS: 3404 CORTINA LN
ROUND ROCK TX 78681-2417

PHONE: 5124875976

FAX:

COMMENTS: Earlier today I accidentally submitted a public comment on Permit Number 165848. It was previously submitted by me and begins by stating "I request a contested case hearing, My name is Shannon White-Shubert." It was submitted around 3:49 PM. Since it was submitted in error, I would like to withdraw the comments made on this particular response, if possible. Please leave the other responses which I made today. Thank you.

Marielle Bascon

From: swshubert@gmail.com
Sent: Monday, November 21, 2022 3:49 PM
To: PUBCOMMENT-OCC
Subject: Public comment on Permit Number 165848

REGULATED ENTITY NAME EXFLUOR RESEARCH

RN NUMBER: RN110969227

PERMIT NUMBER: 165848

DOCKET NUMBER:

COUNTY: WILLIAMSON

PRINCIPAL NAME: EXFLUOR RESEARCH CORPORATION

CN NUMBER: CN602696791

FROM

NAME: Shannon White-Shubert

EMAIL: swshubert@gmail.com

COMPANY:

ADDRESS: 3404 CORTINA LN
ROUND ROCK TX 78681-2417

PHONE: 5126339481

FAX:

COMMENTS: I request a contested case hearing. My name is Shannon White-Shubert, 3404 Cortina Lane, Round Rock, Texas 78681, (512)487-5976 home phone or (512)633-9481 cell. My husband, Mike, and I own 12 beautiful acres located at 1500 CR 236 in Florence, Williamson County, Texas. Our property is located 1,086 feet downhill and to the west of Exflur Research Corporation's property where the proposed "specialty chemical manufacturing facility" will be located. I strongly disagree with the executive director's decision to approve NSR Permit no. 165848 for Exflur Research Corporation. I also request reconsideration of the executive director's decision. My husband, Mike and I are "affected persons." This request is made for myself and my husband, Mike, as owners of the property located at 1500 CR 236, Florence, Texas. We are concerned for our health and the health of our pets, our bees and our beautiful trees. We strongly believe that there are critical health and environmental concerns associated with Exflur's proposed "specialty manufacturing chemical facility." The land we purchased in January of 2020 was a part of the 259.78 acres donated to the Texas A&M Foundation by Dr. Richard A. Box, a lifelong Aggie. The land was surveyed into 22 tracts consisting of 10-18 acres. It was sold by County Road 236 Investments, LLC and marketed as "ranches" with an agricultural exemption in place. Two years later we were shocked to find out that three of the tracts were sold to Exflur Research Corporation and that they were granted permission from County Road 236 Investments, LLC to build a "specialty chemical

manufacturing facility." A "specialty chemical manufacturing facility" does NOT belong in a rural community of single family residential/agricultural properties where there will be less regulation and oversight. This is a serious moral and ethical issue. How the Texas A&M Foundation allowed this to happen is beyond me. It should be noted that Dr. Box is also an "affected person" as he lives in the area. NONE of my neighbors who purchased from County Road 236 Investments, LLC would have purchased their property if they had known about the proposed chemical plant. We all feel deceived. This is fraud. "Fraud consists of some deceitful practice or willful device resorted to with intent to deprive another of his right." We also firmly believe that this particular "use" for Exflur's property conflicts with Paragraph 1.10 - the Nuisance paragraph in our Restrictions. Per US Legal a nuisance is "a substantial interference with the right to use and enjoy land, which may be intentional, negligent or ultra-hazardous in origin, and must be a result of the defendant's activity." Ultra-hazardous is the key here. Some of the chemicals Exflur works with are perfluorocarbons; they are called "forever chemicals" due to the fact that they are extremely stable. They do not break down in the environment. Their life cycles can last from 10K to 50K years! Forever chemicals have been in the news a lot recently which makes me ask why is this permit even being considered for approval given the hazardous nature of forever chemicals? Per the Williamson County Appraisal District there are seven properties raising bees in this community (including us). Potentially, this means that as many as 70 hives will be exposed to Exflur's evaporation pond which will not be covered. We cannot risk this. It is most certain that our honey will be contaminated. In addition, County Road 236, Florence, the location itself, is not equipped to serve industrial or chemical manufacturing needs because the utilities in this rural area are unreliable and scarce. There is inadequate water and no sewer available. All nearby properties use well water. There is no natural gas available. Power outages are common in this area. And the most serious issue is that we do not have a fire department or an emergency response team nearby that can handle the type of Hazardous Materials that Exflur works with or manufactures. This rural community is not equipped for a "specialty chemical manufacturing facility." The nearest fire department is a volunteer fire department in Andice (population 25). The nearest Level 1 Trauma Center is 40 miles away. The nearest Level 2 Trauma Center is 25 miles away. I firmly believe that building a "specialty chemical manufacturing facility" in a rural community like Florence is a very serious moral and ethical issue. I believe it is simply ludicrous that anyone would ignore our concerns. Again, we strongly believe that there are critical health and environmental concerns associated with Exflur's proposed "specialty chemical manufacturing facility" risking toxic gas releases and chemical spills, as well as 24/7 manufacturing activities. Please do the right thing for the residents, our animals and the livestock in our community and do not approve this permit.

1. My name is Shannon White-Shubert, 3404 Cortina Lane, Round Rock, Texas 78681, (512)487-5976 home phone or (512)633-9481 cell.
2. My husband, Mike, and I own 12 beautiful acres located at 1500 County Road 236 in Florence, Williamson County, Texas. Our property is located 1,086 feet downhill and to the west of Exflur Research Corporation's property where the proposed specialty chemical manufacturing facility will be located. The Executive Director's map shows that our property will be approximately 0.33 miles from the proposed facility. This demonstrates personal justiciable interest being within one mile of any emission points of the proposed Exflur facility. Our close proximity indicates that we could be impacted in a manner not common to the general public, which may include a legal right, duty, privilege, power or economic interest which would be affected by Exflur's air permit application. Unfortunately, we are "affected persons." The Executive Director and the Office of Public Interest Counsel have both determined that Mike and I are "affected persons."

Currently we live in Round Rock. In February of this year we began meeting with our builder on a weekly basis. On 03/25/2022 we had 3 concrete foundations poured. The 25x25 concrete foundation is for a well house/storage building to include the water pump and a large tank. The smaller 15x25 concrete foundation is for a commercial greenhouse. The larger 50x60 concrete foundation was poured for a metal building/workshop and there is an additional 650 square feet for covered patios on this structure. In April after we found out about Exflur's plans to build a chemical plant we were forced to pause the building of our dream home on our property. Instead, we are in the process of building a barndominium with a smaller garage/workshop using the 50x60 foundation that we originally had poured for a metal building and a workshop. This is strictly a financial decision. We will not build our dream home within 0.33 miles of a chemical plant.

Please note that we have already changed our plans for the property because of Exflur's proposed chemical plant. We are not using the property as we originally intended. In spite of that, we spend almost every weekend working at our property. Typically, we are picking up debris, trimming the oaks, cutting down the cedars, chipping all the wood we can and when possible we burn the large stumps and the old decaying wood. In addition, I have planted thousands of native seeds, acorns and small trees all over the property as we clear the land of cedars. We love working outdoors to create this park-like atmosphere for our future home. We also raise bees on our property. In addition to the fact that we have not be able to use the property as we intended, we believe there are critical health and environmental issues associated with the approval of this air permit for Exflur's proposed specialty chemical manufacturing facility which will be located ONLY 0.33 MILES from our property.

I ask the Executive Director and the Commissioners to address the issue involving disclosure of Exflur's Declaration of Covenants, Conditions, Easements and Restrictions (the CCR). This involves Mike and myself, as well as everyone who purchased property from County Road 236 Investments, LLC after Exflur purchased Lots # 5, 6, & 7 on 12/13/2019. Due to the collusion and concealment of Exflur's CCR we will potentially risk our health and safety, as well as the health and safety of our pets, our bees and our beautiful property with the approval of this air

permit which will allow Exflur's proposed chemical plant to emit numerous harmful contaminants including carbon monoxide, hydrogen fluorides, hazardous air pollutants, nitrogen oxide, organic compounds and particulate matter including particulate matter. Due to the collusion and concealment of Exflur's CCR we will potentially risk our health and safety as well as the health and safety of our pets, our bees and our beautiful property with the possible risks of accidental toxic gas releases and chemical spills from Exflur's proposed chemical plant. In spite of the natural beauty of our property we would NEVER have purchased that property had we known that Exflur had already received permission to build a specialty chemical manufacturing facility in their CCRs dated November 25, 2019. I understand that the TCEQ cannot rule on issues involving deed restrictions but clearly this issue is much more than that.

I believe my earlier comments regarding disclosure during the Comment Period were misunderstood so I will attempt to clarify them more. In addition, I will submit legal documents including Exflur's Warranty Deed, the CCRs referred to Exflur's Warranty Deed and the CCRs which actually gave Exflur permission to build a specialty chemical manufacturing facility among property sold and marketed as Ranches for Single Family Residential Property. In addition, I will submit a few text messages exchanged between myself and Clay Morgan, one of the partners from County Road 236 Investments, LLC which tells the story of what happened here.

3. First, I would like to file a Request for Reconsideration of the Executive Director's decision under 30 TAC §55.201(e). We strongly disagree with the Executive Director's decision to approve NSR Permit no. 165848 for Exflur Research Corporation. We are very concerned about critical health and environmental risks living near Exflur's proposed chemical plant. Due to our close proximity to Exflur's property, my husband Mike & I risk our health and safety, as well as the health and safety of our pets, our bees and our beautiful property with the approval of this air permit which will allow Exflur to emit numerous harmful contaminants including carbon monoxide, hydrogen fluorides, hazardous air pollutants, nitrogen oxide, organic compounds and particulate matter. As I have previously stated, we have not been able to use our property as we intended. Our plans have already changed due to the proposed specialty chemical manufacturing facility. We will not build our dream home within 0.33 miles of a chemical plant. I can assure you that we would not have purchased this beautiful property if Exflur's plans for the chemical plant had been disclosed prior to when we purchased our property.

We ask the Executive Director and the Commissioners to deny Exflur's proposed air permit number 165848 because we believe that the operation of this facility will conflict with the intent of the Texas Clean Air Act including the protection of the public health and physical property. TEX. HEALTH & SAFETY CODE §382.0518 (b)(2). We are also concerned that Exflur's proposed emissions will not meet the Secondary National Ambient Air Quality Standards (NAAQS), which provides public welfare protection, including protection against damage to animals, crops, vegetation and buildings. We are also concerned that Exflur's proposed air permit does not comply with the TCEQ rule concerning nuisance, which states "No person shall discharge from any source whatsoever one or more contaminants or combinations thereof, in such concentration and of such duration as are or may tend to be injurious to or to adversely affect

human health or welfare, animal life, vegetation or property, or as to interfere with the normal use and enjoyment of animal life, vegetation or property.” 30 TAC §101.4.

Further, we believe that the proposed permit number 165848 for Exfluor conflicts directly with the Nuisance Clause in the CCRs because the chemical plant would emit the following contaminants: carbon monoxide, hydrogen fluorides, hazardous air pollutants, nitrogen oxide, organic compounds and particulate matter including particulate matter with diameters of 10 microns or less and 2.5 microns or less. The CCR was the actual document that gave Exfluor permission to build a special chemical manufacturing facility among a group of properties marketed and sold as ranches for Single Family Residential Property.

The CCRs used by County Road 236 Investments, LLC state under Uses: that “No use can conflict with Paragraph 1.10 herein.” Paragraph 1.10 is titled Nuisances. It states: “No noxious, noisy, offensive, undesirable, unlawful or immoral activity shall be conducted on any tract, nor shall anything be done or permitted to be done thereon which may be or become a nuisance or annoyance to the owners of the adjacent tracts. Any determination by the Declarant that an activity is noxious, noisy, offensive, undesirable or immoral shall be final and binding on all parties.” My neighbors and I believe that the proposed permit number 165848 for Exfluor conflicts directly with the Nuisance Clause in the CCRs because the proposed facility would emit the following contaminants: carbon monoxide, hydrogen fluorides, hazardous air pollutants, nitrogen oxide, organic compounds and particulate matter including particulate matter with diameters of 10 microns or less and 2.5 microns or less. In spite of this, the Declarants have repeatedly refused my request to change Exfluor’s CCRs.

Per US Legal a nuisance is “a substantial interference with the right to use and enjoy land, which may be intentional, negligent or ultra-hazardous in origin, and must be a result of the defendant’s activity.” Ultra-hazardous is the key here. In fact, the Nuisance Clause has been well defined by the Texas Supreme Court in recent years. At the very least, this is Strict Liability Nuisance which occurs when the conduct is “extremely dangerous activity.”

It should be noted that there are seven properties raising bees in this community including us according to the Williamson County Appraisal District. Potentially, this means that as many as 70 hives will be exposed to toxic air emissions as well as Exfluor’s evaporation pond which will not be covered. We cannot risk this. Our honey will most certainly be contaminated. Please do the right thing for the residents, our pets, our bees and our beautiful trees and DO NOT APPROVE THIS PERMIT. Again, we bought property marketed and sold as ranches for Single Family Residential Property. Exfluor’s specialty chemical manufacturing facility DOES NOT BELONG in a rural community among property sold primarily for use as ranches for Single Family Residential Property.

4. Second, as “affected persons” we request a contested case hearing under 30 TEX. ADMIN. CODE §55.201(b). This request is made for my husband, Michael A. Shubert and myself, Shannon White-Shubert. We have demonstrated personal justiciable interest being within one mile of any emission points of the proposed Exfluor facility. According to the survey found in our Farm and Ranch Contract our eastern property line is 1,086 feet from Exfluor’s western property line. We have met all applicable requirements for a hearing request. Our request is in writing; it has

been timely filed; it is based on our own timely comments; and it is both relevant and material to the application.

As I have stated we are very concerned about critical health and environmental risks living near Exflur's proposed chemical plant. Due to our close proximity to Exflur's property, my husband Mike & I risk our health and safety, as well as the health and safety of our pets, our bees and our beautiful property with the approval of this air permit which will allow Exflur to emit numerous harmful contaminants including carbon monoxide, hydrogen fluorides, hazardous air pollutants, nitrogen oxide, organic compounds and particulate matter. We are concerned that we will not be able to use our property as we intended. In fact, our plans have already changed due to the proposed specialty chemical manufacturing facility.

The Office of Public Interest Counsel (OPIC) has recognized our concerns about air quality, risks of health and safety, and use and enjoyment of property as interests protected by law under which this application is being considered. Second, a reasonable relationship exists between those interests and the regulation of air contaminants. And finally, our proximity to facility – only .33 miles – increases the likelihood of impacts to our health, safety and use of the property. The OPIC finds that we qualify as affected persons in this matter.

The Executive Director has also reviewed the factors found in 30 TAC §55.201 (c) and (d), and §55.203 has determined that Mike and I are affected persons. Based on the location of our property, the issues raised and interests affected by the application, Mike and I have identified personal justiciable interests not common to members of the general public.

All relevant and material disputed issues of fact or mixed questions of law have been identified. There are three issues in which the Executive Director also recommends referral to the SOAH which were raised by me:

Issue no. 2 – whether the proposed plant will negatively affect human health, including sensitive groups and physical property.

Issue no. 3 – whether the proposed chemical plant will negatively affect welfare, including plants, animals and the environment.

Issue no. 5 – whether the proposed plant will cause a nuisance or interfere with the use and enjoyment of property.

We ask that Commission grant us a hearing with the State Office of Administrative Hearings (SOAH) for a contested case hearing.

5. As I previously stated the issue which I believe has not been properly addressed by the Commission involves the collusion and concealment of Exflur's Declaration of Covenants, Conditions, Easements & Restrictions (the CCRs) which gave Exflur permission to build a specialty chemical manufacturing facility among property marketed and sold as Ranches for Single Family Residential Property.

The fact is – the collusion and concealment of Exflor’s CCR’s will cause health and environmental risks for Mike and myself as landowners in the immediate vicinity if Exflor is allowed to build their chemical plant and emit toxic substances into the air with this permit. As I have stated, this situation has already created the inability for us to enjoy our property as we intended. I am absolutely certain that we would not have purchased our property if we had been informed of Exflor’s plans to build a chemical plant. Again, I have not spoken to one person – not one – who purchased land from County Road 236 Investments, LLC who was informed of Exflor’s plans to build a chemical plant. No one knew. There were 22 lots sold in this community and there was only one land sale which included three lots (totaling 36.07 acres) which is allowed to use their property for light industrial/light manufacturing uses.

Unresolved Issue from the Public Notice/Comment Period:

Previously, under Comment 1: Public Notice/Comment Period it was stated that I, Shannon White-Shubert, expressed concern that existing property owners were not notified when the Applicant purchased land for the facility. That is not what I stated. I was not referring to existing neighbors. Nor was I referring to a notification given when Exflor purchased their land for the specialty chemical manufacturing facility. In addition, the response from the Executive Director referred to the public notice, as required by TCEQ rules in Chapter 39 (Public Notice) in accordance with statutory requirements. That is not what I was referring to either.

I’m referring specifically to the notice that would have been given when someone purchases property from another person. In this specific situation I am referring to the notice which should have been given by the realtors known as County Road 236 Investments, LLC who represented the Texas A&M Foundation. I argue THAT would have been the appropriate time to decide whether or not you wanted to live with your family near a specialty chemical manufacturing facility. Mike and I should have been able to make that decision before buying our property since Exflor had already purchased their tracts and Exflor had already been granted permission to build a specialty chemical manufacturing facility in the CCRs written by County Road 236 Investments, LLC.

These specific “affected persons” which I refer to are the neighbors who purchased a tract among the 259.78 acres on County Road 236 in Florence which was placed in a charitable remainder unitrust for “Love of, and appreciation for Texas A&M University, its purposes, its students, and its importance to the Grantor.” The 259.78 acres were surveyed into 22 tracts consisting of 10-18 acres, which were marketed and sold as ranches for Single Family Residential Use. There are no documents filed with Williamson County Public Records which establish this property or community as a planned unit development (PUD) or any type of development. There is no subdivision code or subdivision name. No HOA was formed. The property was not developed. The realtors do not refer to themselves as developers only as the declarant on the CCRs. The CCRs were written for each individual property and not for the community-at-large although the CCRs state that they were written “for the purpose of carrying out a uniform plan” and they often imply a community interest. The drawing of the lots with their dimensions in our Farm and Ranch Contract included all 22 of the lots sold by County Road 236 Investments, LLC which implied a community of properties. The proceeds from selling the 259.78 acres were gifted into a charitable remainder unitrust for the Texas A&M Foundation.

To be perfectly clear --- I am concerned that NO ONE was informed that Exflor was granted permission by County Road 236 Investments, LLC to build a specialty chemical manufacturing facility on Lots #5, 6, & 7 located among the 259.78 acres marketed and sold as "ranches" for Single Family Residential Use. AND I am concerned that NONE of my neighbors who purchased property from County Road 236 Investments, LLC would have purchased their property if they had known about the specialty chemical manufacturing facility.

As I have stated previously this land (totaling 259.78 acres) was donated by Dr. Richard A. Box, a lifelong Aggie who ended his career serving on the Board of Regents from 2008-2013, including serving as chairman from 2011-2013. Dr. Box became inducted into the Corp of Cadets Hall of Honor in April of 2018. Dr. Box is salt of the Earth and his legacy should be honored.

My husband Mike found our property three years ago on November 21, 2019. We felt extremely blessed. In January of 2020 we purchased Lot #1 which was a part of the 259.78 acres donated to the Texas A&M Foundation. Again to be perfectly clear, every tract sold, meaning all of the 259.78 acres was marketed as "ranches" for Single Family Residences. None of the property was marketed for use as commercial property or as property for industrial or manufacturing uses. Again, I firmly believe that we should have been able to make the decision about whether or not we wanted to live near a specialty chemical manufacturing facility before we purchased our property. That information should have been disclosed or at least been easily accessible. But it was not. The Warranty Deed for Exflor dated 12/13/2019 refers to "restrictions and covenants, including those recorded in Document Number 2019116579, Official Public Records for Williamson County on November 25, 2019." This document number does not state anything about a specialty chemical manufacturing facility. Document Number 2019116579 is the CCR for Lot #4 consisting of 12.27 acres presently owned by Kyle and Shannon Gehrler. The CCR for Exflor is recorded as Document Number 2019113872 in the Official Public Records dated 11/25/2019. Again, this is the only CCR which states that **light commercial and light industrial/manufacturing** is an approved use for the property in this community and it is NOT directly linked to Exflor's Warranty Deed. Was this an attempt to deceive? Perhaps so.

Two years after purchasing our property - Mike, myself and many of our neighbors were shocked to find out that three of the neighboring tracts sold to Exflor Research Corporation were granted special permission to build a specialty chemical manufacturing facility from County Road 236 Investments, LLC, the realtors representing the Texas A&M Foundation. For me, this has been especially difficult because one of the realtors involved was my 'friend' from my hometown, La Grange. At first I actually defended my 'friend' because I could not believe that he would betray me like this. I kept reassuring myself, thinking that, surely, Clay Morgan would have warned me and told me about the chemical plant. We are friends. I reached out to Clay to ask for help in April of this year after learning about Exflor's plans. First he stated that he didn't know anything about it and that he would have to look into it. Clay then ignored me for over a month and then finally he sent me a text message stating "I don't see how we can. We specifically said they could in their restrictions. In hindsight it was a mistake but to try to change it now would just invite a lawsuit that we would lose."

Feeling helpless I reached out to ask Clay for help again recently through text messages. I asked him why he didn't tell me about the chemical plant -- as my friend. He replied via text stating

"You didn't ask and we didn't and still don't think it's a big deal. It clearly has not effected the property value and I have offered to buy you out as has the warehouse guy. I don't own a single property where I am happy with all of my neighbors. You are not damaged. It is a great investment. Keep it or sell it and buy where you can dictate the uses around you. And we are friends. If you were harmed I would make it right but you are not." According to my 'friend' it was not our decision to make about whether or not we would want to live in the close vicinity of the specialty chemical manufacturing facility. Clay said he didn't tell me because I didn't ask. But I did ask. So did my husband, Mike. And so did several of our neighbors who bought a tract from County Road 236 Investments, LLC.

Please note that Clay stated that "they didn't and still don't think it is a big deal" referring to the specialty chemical manufacturing facility to be built by Exfluor. Clay is aware of our fight over the air permit, the public meetings and the news articles concerning this situation. Please keep in mind that these comments were made in a text by a realtor (a partner in County Road 236 Investments, LLC) who represented the Texas A&M Foundation in this transaction. This is who we are dealing with. And this is exactly why we are in this situation. If the TCEQ does not step up and help us – who will? Please consider this. I believe that Clay's callous comments are very important.

The CCRs used by County Road 236 Investments, LLC state under Uses: that "No use can conflict with Paragraph 1.10 herein." Paragraph 1.10 is titled Nuisances. It states: "No noxious, noisy, offensive, undesirable, unlawful or immoral activity shall be conducted on any tract, nor shall anything be done or permitted to be done thereon which may be or become a nuisance or annoyance to the owners of the adjacent tracts. Any determination by the Declarant that an activity is noxious, noisy, offensive, undesirable or immoral shall be final and binding on all parties." My neighbors and I believe that the proposed permit number 165848 for Exfluor conflicts directly with the Nuisance Clause in the CCRs because the proposed facility would emit the following contaminants: carbon monoxide, hydrogen fluorides, hazardous air pollutants, nitrogen oxide, organic compounds and particulate matter including particulate matter with diameters of 10 microns or less and 2.5 microns or less.

The TCEQ may not be able to rule on deed restrictions but clearly the collusion and concealment of Exfluor's CCR to Mike, myself and others who purchased property from County Road 236 Investments, LLC raises crucial issues that must be addressed. It is a fact that Exfluor's CCR is not identified by the correct document number on Exfluor's Warranty Deed (dated 12/13/2019) and therefore the CCR is not linked to their Warranty Deed dated 12/13/2019 in the Official Public Records of Williamson County. The CCR dated 11/25/2019 grants Exfluor permission to build a specialty chemical manufacturing facility in this rural community. This CCR will create critical health and environmental risks for everyone who purchased property through County Road 236 Investments, LLC. In addition, many property owners including Mike, myself and many of our neighbors will not be able to use to land as we originally intended, if Exfluor's air permit is granted and they are allowed to build a chemical plant on their property.

As I have stated previously numerous times - County Road 236, Florence, the location itself, is not equipped to serve industrial or chemical manufacturing needs because the utilities in this rural area are unreliable and scarce. Power outages are common in this area. And the most

serious issue is that we do not have a fire department or an emergency response team nearby that can handle the type of Hazardous Materials that Exflur works with or manufactures. Again, this is a very serious moral and ethical issue. This rural community is not equipped for a "specialty chemical manufacturing facility." I believe it is simply ludicrous that anyone would ignore our concerns. There is no justifiable reason to build a chemical plant in this rural setting among ranches and single family residential property rather than an industrial park or a manufacturing center. Months ago I spoke to the applicant about these exact concerns his response was simply that he bought his property first. This is true. But the real truth is, that if we had known about Exflur's plans, we would have never bought our property.

Closing:

I am not giving up on our dream to build our forever home and live happily-ever-after on our beautiful property in Florence. Our property is far too valuable not to fight for it. The ambient air on our property is a valuable natural resource and it must be protected by law. Again, I really appreciate the opportunity to address the Executive Director and the Commissioners with my concerns regarding Exflur's NSR Permit no. 165848. Thank you to your staff, the Office of Public Interest Counsel and everyone at the TCEQ who has offered their assistance in fighting this.

As the lyrics go "I might only have one match. But I can make an explosion. And all those things I didn't say - were wrecking balls inside my brain. I will scream them loud tonight. Can you hear my voice this time?..." These really are the appropriate lyrics as my voice grows louder. This is my Fight Song. I have recently sent FOIAs seeking documentation regarding the Box Place Unitrust including the steps used to convert this real estate gift to cash and of course, all documentation from the realtors involved. Awaiting their response, I am preparing letters seeking the help from the seven of the Trustees from the Texas A&M Foundation and from John Sharp, the Chancellor of the Texas A&M University System. I will also ask for help from the nine members of the Texas A&M University System Board of Regents since Dr. Box previously served on this board. My friend, Clay E. Morgan and his business partner Stewart R. Pate have the power as Declarants to change the CCRs with an Amendment. The CCRs states "Any determination by the Declarant that an activity is noxious, noisy, offensive, undesirable or immoral shall be final and binding on all parties." Morgan and Pate have repeatedly rejected our request to change the CCRs and revoke the permission given to Exflur to build a specialty chemical manufacturing facility in close proximity to our property in a rural community marketed and sold as ranches for single family residential properties. Morgan has admitted it was a mistake and now states "to try to change it now would just invite a lawsuit that we would lose." I will keep exerting pressure on the Texas A&M Foundation until that change is made. I will not give up. We are not selling our property.

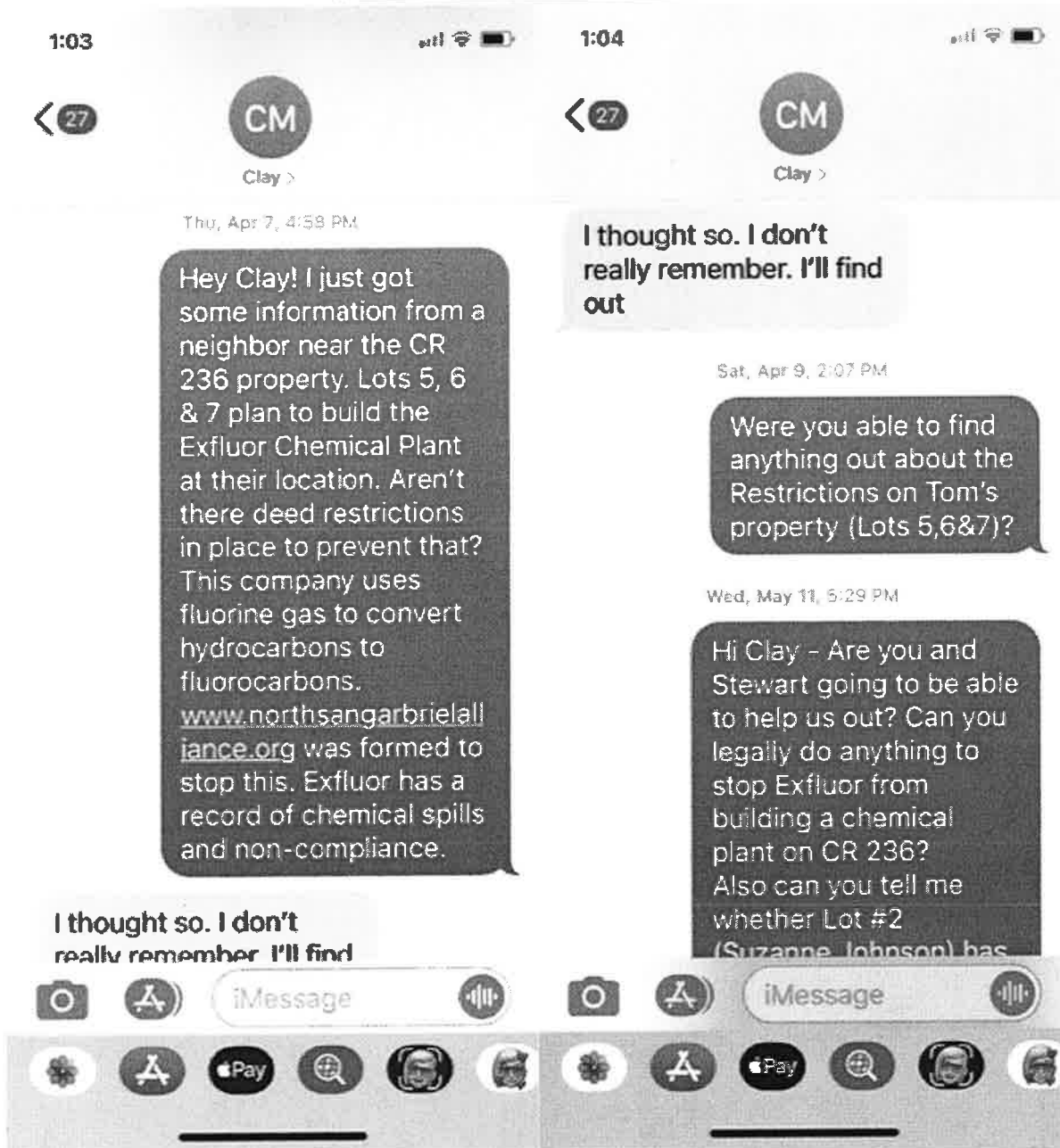
I firmly believe that a little sunshine is desperately needed here. I plan to ask Tyson Voelkel, the current President and CEO of the Texas A&M Foundation, for an investigation so that this does not happen again. We deserve nothing less from a foundation whose vision is to be among the most trusted philanthropies in higher education. In addition, I have a letter with supporting documentation prepared for Williamson County District Attorney Shawn Dick asking for an investigation as well. It should be noted again that NONE of my neighbors who purchased from County Road 236 Investments, LLC would have purchased their property if they had known about Exflur's proposed chemical plant. In fact, I haven't spoken to anyone who was informed prior to purchasing their property from County Road 236

Investments, LLC of the 'special permissions' written by the realtors in the CCRs which allow Exflur to build a chemical plant. A specialty chemical manufacturing facility does NOT belong in a rural community of single family residential and agricultural properties where there will be less regulation and oversight. This is a serious moral and ethical issue.

It should be noted that Dr. Box is also an "affected person" as he lives close to the 259.78 acres he donated to Texas A&M. We all feel deceived. Dr. Box has spoken against the location of Exflur's specialty chemical manufacturing facility. He has stated "As a land owner on the North San Gabriel River close to the proposed Exflur chemical manufacturing facility (CR 236) I join my neighbors with great concern about the State of Texas allowing such a facility that makes such highly toxic chemicals to exist so close to residences, a critical river water supply to a large population." The permission to build a "specialty chemical manufacturing facility" in a rural community was done without any regard for the environment and the health of property owners in the area. This a complete disgrace.

Thank you again for the opportunity to comment on Permit no. 165848 filed by Exflur Research Corporation. My husband, Mike and I strongly believe that there are critical health and environmental concerns associated with our property being in such close proximity to Exflur's chemical plant. Again, if this permit is passed it will allow the proposed facility to emit the following contaminants: carbon monoxide, hydrogen fluorides, hazardous air pollutants, nitrogen oxide, organic compounds and particulate matter including particulate matter with diameters of 10 microns or less and 2.5 microns or less. Exflur's proposed "specialty chemical manufacturing facility" puts us at risk for toxic gas releases and chemical spills, as well as 24/7 manufacturing activities. We ask that you protect our interests – our health and safety and that of our pets, our bees and our beautiful trees. We also ask that you protect one of our most valuable natural resources, our ambient air, so that we can use the property as we intended to. We still want to build our dream home there. We ask you to honor your commitment to Take Care of Texas, especially our beautiful land in Florence.

These text between Clay Morgan and myself tell the real story of the collusion and concealment of Exflur's CCRs.



Hey Clay! I just got some information from a neighbor near the CR 236 property. Lots 5, 6 & 7 plan to build the Exflur Chemical Plant at their location. Aren't there deed restrictions in place to prevent that? This company uses fluorine gas to convert hydrocarbons to fluorocarbons. www.northsangarbrielliance.org was formed to stop this. Exflur has a record of chemical spills and non-compliance.

I thought so. I don't really remember. I'll find out

Were you able to find anything out about the Restrictions on Tom's property (Lots 5,6&7)?

Hi Clay - Are you and Stewart going to be able to help us out? Can you legally do anything to stop Exflur from building a chemical plant on CR 236? Also can you tell me whether Lot #2 (Suzanne Johnson) has

I thought so. I don't really remember. I'll find



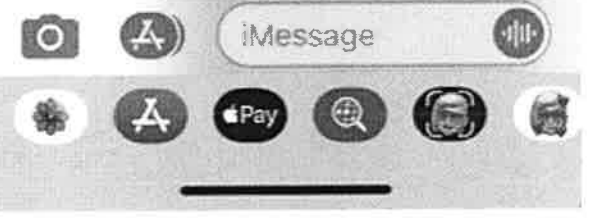
(Suzanne Johnson) has permission from CR 236 Investments, LLC (the declarant) to have an RV park? This is not mentioned on her CCRs.

I don't see how we can. We specifically said they could in their restrictions. In hindsight it was a mistake but to try to change it now would just invite a lawsuit that we would lose. Stewart and I talked about tract 2 the other day and no I don't think the restrictions allow what she is doing.

That is unfortunate



That is unfortunate because we will hire an attorney now. What were Exfluor's Attorneys trying to get y'all to change in the CCRs? The Nuisance clause has been well defined by the Texas Supreme Court in recent years. At the very least, this is Strict Liability Nuisance which occurs when the conduct is "extremely dangerous activity." You should know that Tom Bierschenk has stated repeatedly that Stewart and you should have notified all the properties that a "specialty chemical





"specialty chemical manufacturing facility" was approved for use on those properties. Have you seen the news articles about Exflour? Every major station in Austin and the Statesman has covered it.



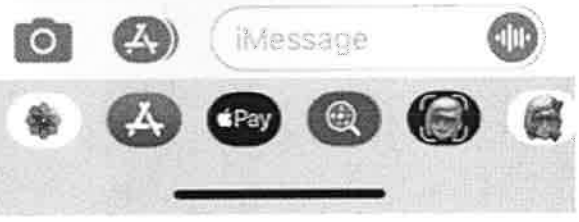
You admitted that you & Stewart made a mistake approving that chemical plant in our previous text. YOU could have told us about it. You chose not to - so yeah, it feels like I have a knife in my back. I thought we were friends.

I understand. At this point conversations between us are over. Time to let lawyers hash it out. Sorry it ended up like this.

You didn't ask and we didn't and still don't think it's a big deal. It has clearly not effected the property value and I have offered to buy you out as has the warehouse guy. I don't own a single property where I am happy with

Tue, Nov 15, 11:22 AM

I haven't found anyone that can remove that knife you stuck in my



1:04

Signal strength, Wi-Fi, and battery icons

< 27

CM

Clay >

Tue, Nov 15, 11:22 AM

I haven't found anyone that can remove that knife you stuck in my back but I'm working on it. I can't forgive you for what you have done so I'm asking you again to right this wrong. TCEQ hasn't issued Exflur an air permit yet. What did Tom ask you to change on the Restrictions? How can we fight this?

Tue, Nov 15, 1:07 PM

You mean the knife where you probably tripled your investment in a couple years. You are welcome.

Camera, App Store, iMessage, Voice recording icons

App icons: Messages, App Store, Apple Pay, Safari, Photos, Camera

1:05

Signal strength, Wi-Fi, and battery icons

< 27

CM

Clay >

...ments.

You didn't ask and we didn't and still don't think it's a big deal. It has clearly not effected the property value and I have offered to buy you out as has the warehouse guy. I don't own a single property where I am happy with all of my neighbors. You are not damaged. It is a great investment. Keep it or sell it and buy where you can dictate the uses around you. And we are friends. If you were harmed I would make it right but you are not.

Camera, App Store, iMessage, Voice recording icons

App icons: Messages, App Store, Apple Pay, Safari, Photos, Camera

15/ITC/ 1948961 -BAS/AK

WARRANTY DEED

NOTICE OF CONFIDENTIALITY RIGHTS: IF YOU ARE A NATURAL PERSON, YOU MAY REMOVE OR STRIKE ANY OF THE FOLLOWING INFORMATION FROM THIS INSTRUMENT BEFORE IT IS FILED FOR RECORD IN THE PUBLIC RECORDS: YOUR SOCIAL SECURITY NUMBER OR YOUR DRIVER'S LICENSE.

DATE: December 13, 2019

GRANTOR: COUNTY ROAD 236 INVESTMENTS, LLC, a Texas limited liability company

Grantee's Mailing Address (including county):

10829 Jollyville Road
Austin, Travis County, Texas 78759

GRANTEE: EXFLUOR RESEARCH CORPORATION, a Texas corporation

Grantor's Mailing Address (including county):

2350 Double Creek Drive
Round Rock, Williamson County, Texas 78664

CONSIDERATION:

TEN AND NO/100 DOLLARS (\$10.00) and other valuable consideration, the receipt and sufficiency of which is hereby acknowledged.

PROPERTY (including any improvements):

(Tracts 5, 6 and 7) A 36.07-acre tract of land out of the William H. Magill Survey, Abstract No. 429, Williamson County, Texas, and further described in Exhibit A, attached hereto and made a part hereof.

RESERVATIONS FROM AND EXCEPTIONS TO CONVEYANCE AND WARRANTY:

This conveyance is made, delivered and accepted subject to the payment of ad valorem taxes and standby fees assessed against the property conveyed for the current year, all restrictions and covenants, including those recorded in Document Number 2019116579, Official Public Records of Williamson County, Texas on November 25, 2019, as well as any subsequently filed restrictions, any outstanding royalty and mineral reservations, any existing real estate liens, conditions and easements of record affecting said property and any and all zoning laws, regulations and ordinances of municipal and/or other governmental authorities affecting said property. Grantor reserves all oil, gas and mineral interest it has to the property.

Grantor, for the consideration and subject to the reservations from and exceptions to conveyance and warranty, grants, sells and conveys to Grantee the property, together with all and singular the rights and appurtenances thereto in any wise belonging, to have and hold said property to Grantee, Grantee's heirs, executors, administrators, successors or assigns forever.


Grantor hereby binds Grantor and Grantor's heirs, successors and assigns to warrant and forever defend all and singular the property to Grantee and Grantee's heirs, executors, administrators, successors, and assigns, against every person whomsoever lawfully claiming or to claim the same or any part thereof, except as to the reservations from and exceptions to warranty.

The herein-described property and improvements are conveyed by Grantor and accepted by Grantee in their current condition. Grantor makes no warranty, express or implied, concerning any aspect of the property, save and except the warranty of title contained herein. Grantee has relied upon Grantee's own inspection of the property and improvements in making the decision to purchase the property and not upon any representation of Grantor. These provisions constitute a portion of the consideration for the conveyance of the property.

THE SALE OF THE PROPERTY IS PROVIDED FOR HEREIN ON AN "AS-IS", "WHERE-IS" BASIS, AND GRANTEE EXPRESSLY ACKNOWLEDGES THAT, EXCEPT FOR THE WARRANTY OF TITLE SET FORTH HEREIN, GRANTOR MAKES NO WARRANTY OR REPRESENTATION, EXPRESS, IMPLIED, OR ARISING BY OPERATION OF LAW, INCLUDING, WITHOUT LIMITATION, ANY WARRANTY OF CONDITION, HABITABILITY, MERCHANTABILITY, OR FITNESS FOR A PARTICULAR PURPOSE, IN RESPECT OF THE PROPERTY OR ANY IMPROVEMENTS CONSTRUCTED THEREON. GRANTOR HEREBY SPECIFICALLY DISCLAIMS ANY WARRANTY, GUARANTY OR REPRESENTATION, ORAL OR WRITTEN, PAST, PRESENT OR FUTURE, OF, AS TO, OR CONCERNING (A) THE NATURE AND CONDITION OF THE PROPERTY OR ANY IMPROVEMENTS, INCLUDING, WITHOUT LIMITATION, THE WATER, SOIL, OR GEOLOGY THEREOF, OR THE SUITABILITY OF THE PROPERTY, OR ANY IMPROVEMENTS THEREON, FOR ANY ACTIVITIES OR USES WHICH THE GRANTEE MAY ELECT TO CONDUCT THEREON, OR THE EXISTENCE OF ANY ENVIRONMENTAL HAZARDS OR CONDITIONS THEREON; (B) THE NATURE AND EXTENT OF ANY RIGHT OF WAY, LEASE, LIEN, ENCUMBRANCE, LICENSE, RESERVATION, CONDITION OR OTHER MATTER AFFECTING THE PROPERTY OR ANY IMPROVEMENTS THEREON; OR (C) THE COMPLIANCE OF THE PROPERTY OR ANY IMPROVEMENTS THEREON, OR THEIR OPERATION IN ACCORDANCE WITH, ANY LAWS, RULES, ORDINANCES OR REGULATIONS OF ANY GOVERNMENTAL OR OTHER BODY.

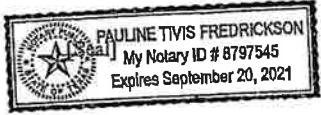
When the context requires, singular nouns and pronouns include the plural.

COUNTY ROAD 236 INVESTMENTS, LLC,
a Texas limited liability company
By: Ventana Hills, Ltd., Manager


Stewart R. Pate, Manager
White Bluff Development, LLC,
a Texas limited liability company
General Partner

STATE OF TEXAS §
COUNTY OF Williamson §

This instrument was acknowledged before me this 13 day of December, 2019 by Stewart R. Pate, Manager of White Bluff Development, LLC, a Texas limited liability company, General Partner of Ventana Hills, Ltd., a Texas limited partnership, Manager of County Road 236 Investments, LLC, a Texas limited liability company, on behalf of said company.



Pauline Tivis Fredrickson
NOTARY PUBLIC, STATE OF TEXAS

Commission Expiration

Notary's Name Typed or Printed

AFTER RECORDING RETURN TO:

Unofficial Document

EXHIBIT "A"**Maples & Associates, Inc.**

www.maplesinc.com • P.O. Box 893 • Lampasas, Texas 76550 • (512) 558-2078 • (512) 556-0500 fax • Firm No. 10097700

LEGAL DESCRIPTION OF A TRACT OF LAND IN WILLIAMSON COUNTY, TEXAS.

Being 36.07 acres of the William H. Magill Survey, Abst. No. 429 in Williamson County, Texas, and being part of a 224.71 acre tract of land described in a deed from Richard A. Box, Trustee of Box Place Charitable Remainder Trust, to County Road 236 Investments, LLC., dated August 13, 2019, recorded as Doc. No. 2019075032 of the Official Public Records of Williamson County, Texas; said 36.07 acres being more particularly described as follows:

BEGINNING at a 1/2 inch iron pin with cap marked "MAPLES RPLS 5043" set on the north line of said 224.71 acre tract and the south line of a 262.05 acre tract of land described in Exhibit B in a deed to Ernest Franklin Allen, as recorded in Vol. 1469, Page 876 of said official public records; and being approximately 1.2 feet north of a fence, from whence a 1/2 inch iron pin found in concrete at a fence corner for the northeast corner of said 224.71 acre tract brs. North 70° 19' 39" East, 5342.14 feet;

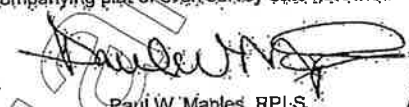
THENCE South 19° 46' 41" East, 1445.84 feet to 1/2 inch iron pin with cap marked "MAPLES RPLS 5043" found on the north line of County Road 236 for a southeast corner of said 224.71 acre tract and the southwest corner of a 35.07 acre tract of land described in a deed to County Road 236 Investments, LLC, recorded as Doc. No. 2019075033 of said official public records;

THENCE with the north line of said County Road 236, with the south line of said 224.71 acre tract, and along the general course of a fence as follows:

South 70° 13' 29" West, 223.81 feet to a 1/2 inch iron pin found;
 South 72° 52' 05" West, 211.32 feet to a 5/8 inch iron pin found;
 South 70° 00' 12" West, 647.71 feet to a 1/2 inch iron pin with cap marked "MAPLES RPLS 5043" set;

THENCE North 19° 36' 35" West, 1440.52 feet to a 1/2 inch iron pin with cap marked "MAPLES RPLS 5043" set on the north line of said 224.71 acre tract and the south line of said 262.05 acre tract, being approximately 6.5 feet north of a fence;

THENCE North 70° 19' 33" East, with the north line of said 224.71 acre tract, with the south line of said 262.05 acre tract, 1088.38 feet to the PLACE OF BEGINNING, as surveyed on the ground on August 23, 2019, by MAPLES & ASSOCIATES, INC., and as shown on an accompanying plat of even survey date herewith.


 Paul W. Maples, RPLS.
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**ELECTRONICALLY RECORDED
OFFICIAL PUBLIC RECORDS**

2019120557

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12/13/2019 12:24 PM



Nancy E. Rister

Nancy E. Rister, County Clerk
Williamson County, Texas

Unofficial Document

building of any kind shall be set back 15 feet from any side property line and 15 feet from any rear property line.

- 1.04 Quality Workmanship, Building Materials and Maintenance: All improvements and structures including but not limited to homes, garages, fences, storage buildings, and other improvements shall be constructed of quality, new material and in a workmanlike manner.
- 1.05 Rubbish and Debris: No rubbish or debris or any kind shall be placed or permitted to accumulate upon the Property and no odors shall be permitted to arise therefrom so as to render the Property or any portion thereof unsanitary, unsightly, offensive or detrimental to any other property or to its occupants.
- 1.06 Easements: Easements are hereby reserved and dedicated over and across a 15 foot strip along County Road 236, 15 feet along each side tract line, and 15 feet along the rear tract line, for the purpose of installing, maintaining and repairing, electric power, gas, telephone, water, cable, community mailbox station, drainage and/or any other similar utility lines, facilities, and services for the tracts in the Property. The easements reserved and dedicated hereby shall be for the general benefit of the Property. These easements shall inure to the benefit of, and may be used by, any public or private company entering into and upon the Property for such purposes, without the necessity of any further grant of such easement rights to such companies. Any property owner installing a fence or other improvement within the area encumbered by the easement does so at his own risk. If two or more tracts are owned by one owner and wish to be consolidated into a single building site, then these easement provisions and the setback provisions in paragraph 1.03 shall be applied to such resultant building site as if it were one original platted tract and no easements or setback lines will exist along the common tract line.
- 1.07 Restriction on Further Subdivision: There shall be no dividing, subdividing, or re-subdividing allowed of any of the tracts into smaller tracts for a period of at least five (5) years from the date of purchase of the tract with the exception.
- 1.08 Sewage: Wastewater and sewage shall be disposed of by means of private sanitary sewer systems or similar approved means of sanitary sewage disposal which meet the requirements of and are approved by all governmental authorities having jurisdiction thereof. No residence shall be used or occupied until sanitary sewage disposal facilities complying with this paragraph have been completely built and approved by the governmental authority.
- 1.09 Trash Disposal: No tract shall ever be used for or maintained as a dumping ground for rubbish, fill, road or construction materials, debris or junk.
- 1.10 Nuisances: No noxious, noisy, offensive, undesirable, unlawful or immoral activity shall be conducted on any tract, nor shall anything be done or permitted to be done thereon which may be or become a nuisance or annoyance to the owners of adjacent tracts. Any determination by the Declarant that an activity is noxious, noisy, offensive, undesirable or immoral shall be final and binding on all parties.

- 1.11 Unused Vehicles: The placement of junked, abandoned, wrecked, or non-operating items of any kind such as motor vehicles, boats, or other equipment or materials shall not be permitted on any portion of the Property. The repairing of motor vehicles, boats or any other items of a mechanic nature shall not be permitted on any tract, except within a garage or other comparable enclosed structure.
- 1.12 Boats and Trailers and Trucks: No commercial vehicles with more than 1 rear axle shall be allowed at any time other than during the construction of the primary residence, driveways or ancillary structures. No commercial vehicles will be stored on the tract for any reason. These vehicles include, but are not limited to, dump trucks of any kind, bobtails, belly dumps and trailers designed to be pulled by trucks with more than 1 rear axle.
- 1.13 Temporary Structures: No structure or improvement of a temporary character, tent, storage container, camper, shack, garage, barn or other outbuilding shall at any time be used as a residence or dwelling. A recreational vehicle or travel trailer may be used as a temporary residence, during the construction period for a permanent home, for a maximum period of twenty-four (24) months from the initial closing date of the tract. Any building considered a "tiny" home may only be used as a residence with the written consent of the Declarant.
- 1.14 Animals: In no event shall pigs, hogs, swine or dangerous animals be allowed on a tract under any condition. No pets or farm animals may be kept if they become offensive or a nuisance by virtue of their numbers, sight, odor or noise.

ARTICLE 2

GENERAL

- 2.01 Enforcement: Declarant, and any person owning any interest in any of the tracts in said Property, including mortgage interest, may enforce these restrictions through a proceeding at law or in equity against the person or persons violating or attempting to violate any covenant, condition, restriction, or limitation, either to prevent or to correct such violation, or to recover damages, or to obtain other relief for such violation. All expenses, including a reasonable attorney fee, shall be recovered from anyone violating these restrictions by the party bringing the suit.
- 2.02 Limitations of Liability: The Declarant shall not be liable in damages or otherwise to any owner of any tract within the Property by reason of mistake of judgment, negligence or nonfeasance arising out of or in connection with: (a) the approval or disapproval, or failure to approve or to disapprove any plans or specifications; (b) the enforcement of, or the failure to enforce, the covenants, conditions, easements and restrictions of this Declaration; or (c) any other action taken or not taken pursuant to the provisions of this Declaration.
- 2.03 Partial Invalidity: If any portion of this Declaration is declared illegal, invalid, or unenforceable by law or court order, such action shall not affect the validity of any other provision hereof. Failure to enforce any one or more provisions hereof shall not


constitute a waiver thereof as to future enforcement and shall not serve to invalidate any other provision of this Declaration.

- 2.04. Duration: These covenants, conditions, easements and restrictions shall run with the land and shall be binding upon and against the Property for a period of twenty-five (25) years from the date of recordation, after which time said covenants shall be automatically extended for successive periods of ten (10) years unless an instrument signed by the then owners of seventy-five percent (75%) or more of the Property (by tract) has been recorded agreeing to change said covenants in whole or in part. No such agreement to change shall be effective unless made and recorded within three (3) months immediately prior to the date the covenants otherwise would be automatically extended.
- 2.05. Amendment: This Declaration may be amended by Declarant at any time, and from time to time, in its sole discretion.
- 2.06. Assignment of Declarant: Notwithstanding anything in this Declaration to the contrary, Declarant may assign, in whole or in part, any of its privileges, exemptions, rights and duties under this Declaration to any other person or entity and may permit the participation, in whole or in part, by any other person or entity in any of its privileges, exemptions, rights and duties hereunder.
- 2.07. No Warranty of Enforceability: While Declarant has no reason to believe that any of the restrictive covenants or other terms and provisions contained in this Declaration are or may be invalid or unenforceable for any reason or to any extent, Declarant makes no warranty or representation as to the present or future validity or enforceability of any such restrictive covenants, terms or provisions. Any owner acquiring a tract in reliance on one or more of such restrictive covenants, terms or provisions shall assume all risks of the validity and enforceability thereof and by acquiring the tract, agrees to hold Declarant harmless therefrom.
- 2.08. Interpretation: The provisions of this Declaration shall be liberally construed to effectuate the purposes of creating a uniform plan for the operation of the Property, and of promoting and effectuating the fundamental concepts of the Property set forth in this Declaration. This Declaration shall be construed and governed under the laws of the State of Texas.
- 2.09. Exemption of Declarant; Utility Easements:
- a. Without in any way limiting the generality of the preceding sentence, this Declaration shall not prevent or limit the right of Declarant to excavate and grade, to construct and alter drainage patterns and facilities, to construct any and all other types of improvements, sales and leasing offices and similar facilities, and to post signs incidental to construction, sales and leasing anywhere within the Property.
 - b. Declarant reserves the right to locate, construct, erect and maintain, or cause to be located, constructed, erected and maintained in and on any areas owned by Declarant, pipelines, conduits, wires and any improvements relating to a public utility function with the right of access to the same at any time for the purposes of repair and maintenance.

2.10 Laws and Regulations: All owners of any tracts within the Property shall at all times comply with all applicable laws, regulations and ordinances of municipal, county, state, federal or other governmental authorities.

IN WITNESS WHEREOF DECLARANT has caused this document to be executed by its duly authorized member this 6th day of November, 2019.

County Road 236 Investments, LLC
a Texas limited liability company


By: Stewart Pata
Title: Manager

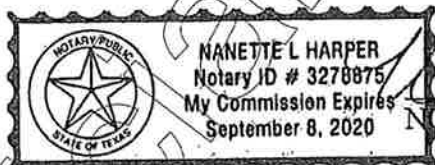
STATE OF TEXAS

§
§
§

COUNTY OF TRAVIS

This instrument was acknowledged before me this 6th day of November, 2019 by Stewart Pata, Manager of County Road 236 Investments, LLC, a Texas limited liability company, on behalf of said company.

[Seal]




NOTARY PUBLIC, STATE OF TEXAS

AFTER RECORDING, RETURN TO:

County Road 236 Investments, LLC
10829 Jollyville Road
Austin, Texas 78759

Maples & Associates, Inc.

www.maplesinc.com • P.O. Box 893 • Lampasas, Texas 76550 • (512) 556-2078 • (512) 556-0500 fax • Firm No. 10097700

LEGAL DESCRIPTION OF A TRACT OF LAND IN WILLIAMSON COUNTY, TEXAS.

Being 12.27 acres of the William H. Magill Survey, Abst. No. 429 in Williamson County, Texas, and being part of a 224.71 acre tract of land described in a deed from Richard A. Box, Trustee of Box Place Charitable Remainder Trust, to County Road 236 Investments, LLC, dated August 13, 2019, recorded as Doc. No. 2019075032 of the Official Public Records of Williamson County, Texas; said 12.27 acres being more particularly described as follows;

BEGINNING at a 1/2 inch iron pin with cap marked "MAPLES RPLS 5043" set on the north line of said 224.71 acre tract and the south line of a 224.71 acre tract of land described in Exhibit B in a deed to Ernest Franklin Allen, as recorded in Vol. 1469, Page 876 of said official public records, and being approximately 6.9 feet north of a fence, from whence a 1/2 inch iron pin found in concrete at a fence corner for the northeast corner of said 224.71 acre tract brs. North 70° 19' 39" East, 6430.52 feet;

THENCE South 19° 36' 35" East, 1440.53 feet to 1/2 inch iron pin with cap marked "MAPLES RPLS 5043" set on the north line of County Road 236 and the south line of said 224.71 acre tract;

THENCE South 69° 58' 35" West, with the north line of said County Road 236, with the south line of said 224.71 acre tract, and along the general course of a fence, 378.93 feet to a 1/2 inch iron pin with cap marked "MAPLES RPLS 5043" set;

THENCE North 18° 57' 43" West, 1442.95 feet to a 1/2 inch iron pin with cap marked "MAPLES RPLS 5043" set on the north line of said 224.71 acre tract and the south line of said 262.05 acre tract, being approximately 10 feet north of a fence;

THENCE North 70° 19' 39" East, with the north line of said 224.71 acre tract, with the south line of said 262.05 acre tract, 362.61 feet to the PLACE OF BEGINNING, as surveyed on the ground on August 23, 2019, by MAPLES & ASSOCIATES, INC., and as shown on an accompanying plat of even survey date herewith.

Paul W. Maples, RPLS
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Nancy E. Rister

Nancy E. Rister, County Clerk
Williamson County, Texas

Unofficial Document

setback of at least 50 feet from the front property line. The residences, garages, or any other building of any kind shall be set back 50 feet from any side property line and 25 feet from any rear property line.

- 1.04 Quality Workmanship, Building Materials and Maintenance: All improvements and structures including but not limited to homes, garages, fences, storage buildings, and other improvements shall be constructed of quality, new material and in a workmanlike manner.
- 1.05 Rubbish and Debris: No rubbish or debris or any kind shall be placed or permitted to accumulate upon the Property and no odors shall be permitted to arise therefrom so as to render the Property or any portion thereof unsanitary, unsightly, offensive or detrimental to any other property or to its occupants.
- 1.06 Easements: Easements are hereby reserved and dedicated over and across a 15 foot strip along County Road 236, 15 feet along each side tract line, and 15 feet along the rear tract line, for the purpose of installing, maintaining and repairing, electric power, gas, telephone, water, cable, community mailbox station, drainage and/or any other similar utility lines, facilities, and services for the tracts in the Property. The easements reserved and dedicated hereby shall be for the general benefit of the Property. These easements shall inure to the benefit of, and may be used by, any public or private company entering into and upon the Property for such purposes, without the necessity of any further grant of such easement rights to such companies. Any property owner installing a fence or other improvement within the area encumbered by the easement does so at his own risk. If two or more tracts are owned by one owner and wish to be consolidated into a single building site, then these easement provisions and the setback provisions in paragraph 1.03 shall be applied to such resultant building site as if it were one original platted tract and no easements or setback lines will exist along the common tract line.
- 1.07 Restriction on Further Subdivision: There shall be no dividing, subdividing, or re-subdividing allowed of any of the tracts into smaller tracts for a period of at least five (5) years from the date of purchase of the tract.
- 1.08 Sewage: Wastewater and sewage shall be disposed of by means of private sanitary sewer systems or similar approved means of sanitary sewage disposal which meet the requirements of and are approved by all governmental authorities having jurisdiction thereof. No residence shall be used or occupied until sanitary sewage disposal facilities complying with this paragraph have been completely built and approved by the governmental authority.
- 1.09 Trash Disposal: No tract shall ever be used for or maintained as a dumping ground for rubbish, fill, road or construction materials, debris or junk.
- 1.10 Nuisances: No noxious, noisy, offensive, undesirable, unlawful or immoral activity shall be conducted on any tract, nor shall anything be done or permitted to be done thereon which may be or become a nuisance or annoyance to the owners of adjacent tracts. Any determination by the Declarant that an activity is noxious, noisy, offensive, undesirable or immoral shall be final and binding on all parties.

- 1.11 Unused Vehicles: The placement of junked, abandoned, wrecked, or non-operating items of any kind such as motor vehicles, boats, or other equipment or materials shall not be permitted on any portion of the Property. The repairing of motor vehicles, boats or any other items of a mechanic nature shall not be permitted on any tract, except within a garage or other comparable enclosed structure.
- 1.12 Temporary Structures: No structure or improvement of a temporary character, tent, storage container, camper, shack, garage, barn or other outbuilding shall at any time be used as a residence or dwelling. A recreational vehicle or travel trailer may be used as a temporary residence, during the construction period for a permanent home, for a maximum period of twenty-four (24) months from the initial closing date of the tract. Any building considered a "tiny" home may only be used as a residence with the written consent of the Declarant.
- 1.13 Animals: In no event shall pigs, hogs, swine or dangerous animals be allowed on a tract under any condition.

ARTICLE 2

GENERAL

- 2.01 Enforcement: Declarant, and any person owning any interest in any of the tracts in said Property, including mortgage interest, may enforce these restrictions through a proceeding at law or in equity against the person or persons violating or attempting to violate any covenant, condition, restriction, or limitation, either to prevent or to correct such violation, or to recover damages, or to obtain other relief for such violation. All expenses, including a reasonable attorney fee, shall be recovered from anyone violating these restrictions by the party bringing the suit.
- 2.02 Limitations of Liability: The Declarant shall not be liable in damages or otherwise to any owner of any tract within the Property by reason of mistake of judgment, negligence or nonfeasance arising out of or in connection with: (a) the approval or disapproval, or failure to approve or to disapprove any plans or specifications; (b) the enforcement of, or the failure to enforce, the covenants, conditions, easements and restrictions of this Declaration; or (c) any other action taken or not taken pursuant to the provisions of this Declaration.
- 2.03 Partial Invalidity: If any portion of this Declaration is declared illegal, invalid, or unenforceable by law or court order, such action shall not affect the validity of any other provision hereof. Failure to enforce any one or more provisions hereof shall not constitute a waiver thereof as to future enforcement and shall not serve to invalidate any other provision of this Declaration.
- 2.04. Duration: These covenants, conditions, easements and restrictions shall run with the land and shall be binding upon and against the Property for a period of twenty-five (25) years from the date of recordation, after which time said covenants shall be automatically extended for successive periods of ten (10) years unless an instrument signed by the then owners of seventy-five percent (75%) or more of the Property (by tract) has been recorded agreeing to change said covenants in whole or in part. No such agreement to

change shall be effective unless made and recorded within three (3) months immediately prior to the date the covenants otherwise would be automatically extended.

- 2.05 Amendment: This Declaration may be amended by Declarant at any time, and from time to time, in its sole discretion.
- 2.06 Assignment of Declarant: Notwithstanding anything in this Declaration to the contrary, Declarant may assign, in whole or in part, any of its privileges, exemptions, rights and duties under this Declaration to any other person or entity and may permit the participation, in whole or in part, by any other person or entity in any of its privileges, exemptions, rights and duties hereunder.
- 2.07 No Warranty of Enforceability: While Declarant has no reason to believe that any of the restrictive covenants or other terms and provisions contained in this Declaration are or may be invalid or unenforceable for any reason or to any extent, Declarant makes no warranty or representation as to the present or future validity or enforceability of any such restrictive covenants, terms or provisions. Any owner acquiring a tract in reliance on one or more of such restrictive covenants, terms or provisions shall assume all risks of the validity and enforceability thereof and by acquiring the tract, agrees to hold Declarant harmless therefrom.
- 2.08 Interpretation: The provisions of this Declaration shall be liberally construed to effectuate the purposes of creating a uniform plan for the operation of the Property, and of promoting and effectuating the fundamental concepts of the Property set forth in this Declaration. This Declaration shall be construed and governed under the laws of the State of Texas.
- 2.09 Exemption of Declarant; Utility Easements:
- a. Without in any way limiting the generality of the preceding sentence, this Declaration shall not prevent or limit the right of Declarant to excavate and grade, to construct and alter drainage patterns and facilities, to construct any and all other types of improvements, sales and leasing offices and similar facilities, and to post signs incidental to construction, sales and leasing anywhere within the Property.
 - b. Declarant reserves the right to locate, construct, erect and maintain, or cause to be located, constructed, erected and maintained in and on any areas owned by Declarant, pipelines, conduits, wires and any improvements relating to a public utility function with the right of access to the same at any time for the purposes of repair and maintenance.
- 2.10 Laws and Regulations: All owners of any tracts within the Property shall at all times comply with all applicable laws, regulations and ordinances of municipal, county, state, federal or other governmental authorities.

IN WITNESS WHEREOF DECLARANT has caused this document to be executed by its duly authorized member this 25 day of November, 2019.

County Road 236 Investments, LLC
a Texas limited liability company

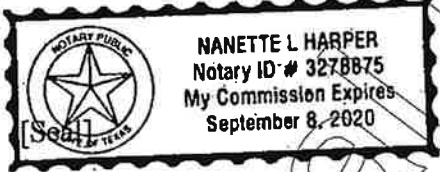
[Signature]
By: Stewart Tate
Title: Manager

STATE OF TEXAS

§
§
§

COUNTY OF TRAVIS

This instrument was acknowledged before me this 25th day of November, 2019 by Stewart Tate, Manager of County Road 236 Investments, LLC, a Texas limited liability company, on behalf of said company.



[Signature]
NOTARY PUBLIC, STATE OF TEXAS

AFTER RECORDING, RETURN TO:

County Road 236 Investments, LLC
10829 Jollyville Road
Austin, Texas 78759

Exhibit A

Maples & Associates, Inc.

www.maplesinc.com • P.O. Box 893 • Lampasas, Texas 76550 • (512) 556-2078 • (512) 556-0500 fax • Firm No. 10097700

LEGAL DESCRIPTION OF A TRACT OF LAND IN WILLIAMSON COUNTY, TEXAS.

Being 36.07 acres of the William H. Magill Survey, Abst. No. 429 in Williamson County, Texas, and being part of a 224.71 acre tract of land described in a deed from Richard A. Box, Trustee of Box Place Charitable Remainder Trust, to County Road 236 Investments, LLC, dated August 13, 2019, recorded as Doc. No. 2019075032 of the Official Public Records of Williamson County, Texas; said 36.07 acres being more particularly described as follows;

BEGINNING at a 1/2 inch iron pin with cap marked "MAPLES RPLS 5043" set on the north line of said 224.71 acre tract and the south line of a 262.05 acre tract of land described in Exhibit B in a deed to Ernest Franklin Allen, as recorded in Vol. 1469, Page 876 of said official public records, and being approximately 1.2 feet north of a fence, from whence a 1/2 inch iron pin found in concrete at a fence corner for the northeast corner of said 224.71 acre tract brs. North 70° 19' 39" East, 5342.14 feet;

THENCE South 19° 46' 41" East, 1445.84 feet to 1/2 inch iron pin with cap marked "MAPLES RPLS 5043" found on the north line of County Road 236 for a southeast corner of said 224.71 acre tract and the southwest corner of a 35.07 acre tract of land described in a deed to County Road 236 Investments, LLC, recorded as Doc. No. 2019075033 of said official public records;

THENCE with the north line of said County Road 236, with the south line of said 224.71 acre tract, and along the general course of a fence as follows;

- South 70° 13' 29" West, 233.81 feet to a 1/2 inch iron pin found;
- South 72° 52' 05" West, 211.32 feet to a 5/8 inch iron pin found;
- South 70° 00' 12" West, 647.71 feet to a 1/2 inch iron pin with cap marked "MAPLES RPLS 5043" set;

THENCE North 19° 36' 35" West, 1440.52 feet to a 1/2 inch iron pin with cap marked "MAPLES RPLS 5043" set on the north line of said 224.71 acre tract and the south line of said 262.05 acre tract, being approximately 6.5 feet north of a fence;

THENCE North 70° 19' 33" East, with the north line of said 224.71 acre tract, with the south line of said 262.05 acre tract, 1088.38 feet to the PLACE OF BEGINNING, as surveyed on the ground on August 23, 2019, by MAPLES & ASSOCIATES, INC., and as shown on an accompanying plat of even survey date herewith.

Paul W. Maples, RPLS
©2019 All rights reserved.



County Road 236 Investments LLC
① 10829 Jollyville Road
Austin TX 78759

FILED AND RECORDED
OFFICIAL PUBLIC RECORDS 2019113872

REST Fee: \$41.00
11/25/2019 02:03 PM OSALINAS



Nancy E. Rister
Nancy E. Rister, County Clerk
Williamson County, Texas

Unofficial Document

2:34



Clay >

Thu, Apr 7, 4:58 PM

Hey Clay! I just got some information from a neighbor near the CR 236 property. Lots 5, 6 & 7 plan to build the Exflor Chemical Plant at their location. Aren't there deed restrictions in place to prevent that? This company uses fluorine gas to convert hydrocarbons to fluorocarbons. www.northsangarbrielalliance.org was formed to stop this. Exflor has a record of chemical spills and non-compliance.

I thought so. I don't really remember. I'll find



iMessage



2:34



Clay >

I thought so. I don't really remember. I'll find out

Sat, Apr 9, 2:07 PM

Were you able to find anything out about the Restrictions on Tom's property (Lots 5,6&7)?

Wed, May 11, 5:29 PM

Hi Clay - Are you and Stewart going to be able to help us out? Can you legally do anything to stop Exfluor from building a chemical plant on CR 236? Also can you tell me whether Lot #2 (Suzanne Johnson) has



iMessage



2:34



Clay >

whether Lot #2 (Suzanne Johnson) has permission from CR 236 Investments, LLC (the declarant) to have an RV park? This is not mentioned on her CCRs.

I don't see how we can. We specifically said they could in their restrictions. In hindsight it was a mistake but to try to change it now would just invite a lawsuit that we would lose. Stewart and I talked about tract 2 the other day and no I don't think the restrictions allow what she is doing.



2:34



Clay >

That is unfortunate because we will hire an attorney now. What were Exflor's Attorneys trying to get y'all to change in the CCRs? The Nuisance clause has been well defined by the Texas Supreme Court in recent years. At the very least, this is Strict Liability Nuisance which occurs when the conduct is "extremely dangerous activity." You should know that Tom Bierschenk has stated repeatedly that Stewart and you should have notified all the properties that a "specialty chemical



iMessage



2:34



Clay >

properties that a "specialty chemical manufacturing facility" was approved for use on those properties. Have you seen the news articles about Exflor? Every major station in Austin and the Statesman has covered it.

I understand. At this point conversations between us are over. Time to let lawyers hash it out. Sorry it ended up like this.

Tue, Nov 15, 11:22 AM

I haven't found anyone that can remove that



iMessage



2:35



Clay >

Tue, Nov 15, 11:22 AM

I haven't found anyone that can remove that knife you stuck in my back but I'm working on it. I can't forgive you for what you have done so I'm asking you again to right this wrong. TCEQ hasn't issued Exflor an air permit yet. What did Tom ask you to change on the Restrictions? How can we fight this?

Tue, Nov 15, 1:07 PM

You mean the knife where you probably tripled your investment in a couple years. You are welcome.



iMessage



2:35



< 29



Clay >

You admitted that you & Stewart made a mistake approving that chemical plant in our previous text. YOU could have told us about it. You chose not to - so yeah, it feels like I have a knife in my back. I thought we were friends.

You didn't ask and we didn't and still don't think it's a big deal. It has clearly not effected the property value and I have offered to buy you out as has the warehouse guy. I don't own a single property where I am happy with



iMessage



2:35



Clay >

You didn't ask and we didn't and still don't think it's a big deal. It has clearly not effected the property value and I have offered to buy you out as has the warehouse guy. I don't own a single property where I am happy with all of my neighbors. You are not damaged. It is a great investment. Keep it or sell it and buy where you can dictate the uses around you. And we are friends. If you were harmed I would make it right but you are not.



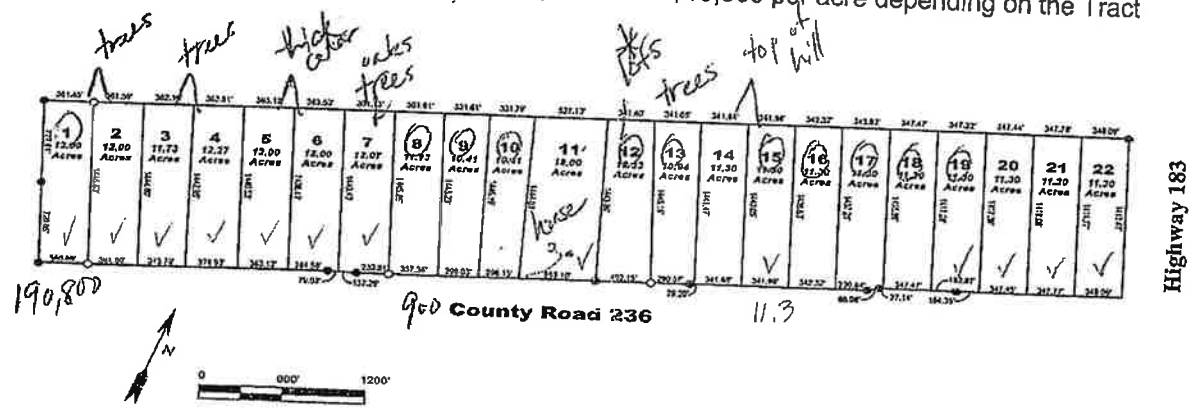
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236 Ranches Williamson County 10 - 18 Acre Tracts

*FYI
incorporated
08-05-2019*

- Location:** The Property is located just west of the intersection of Hwy 183 North and County Road 236 in Williamson County, 8 - 9 minutes north (9.9 miles) of Hwy 29.
- Access:** All Tracts have direct access to County Road 236. No flag lots.
- Sizes Available:** 10 to 18 acre Tracts are available
- Topography:** Generally level terrain with good soil and grass cover. Some areas have open pasture with small scattered cedars while several areas include extensive live oak, post oak and brush. Long views are available from several of the Tracts.
- Utilities:** Pedernales Electric Coop (on CR 236), private water wells, on-site septic systems will be required
- School District:** Florence ISD
- Taxes:** Agricultural exemption in place
- Restrictions:** Reasonable restrictions are in place. Ask for a copy.
- Prices:** Range from \$11,900 per acre to \$15,900 per acre depending on the Tract



Contact: Clay Morgan (512) 517-2557
Stewart Pate (512) 748-9715

The information contained herein has been obtained from reliable sources, and we have no reason to doubt the accuracy of such information; however, no warranty or guarantee, either implied or expressed, is made with respect to the accuracy thereof. All such information is submitted subject to errors, omissions, or changes in conditions including the presence of any hazardous materials or any other environmental conditions that may affect the value or suitability of the property. All information contained herein should be verified to the satisfaction of the person relying on it.

2021 22

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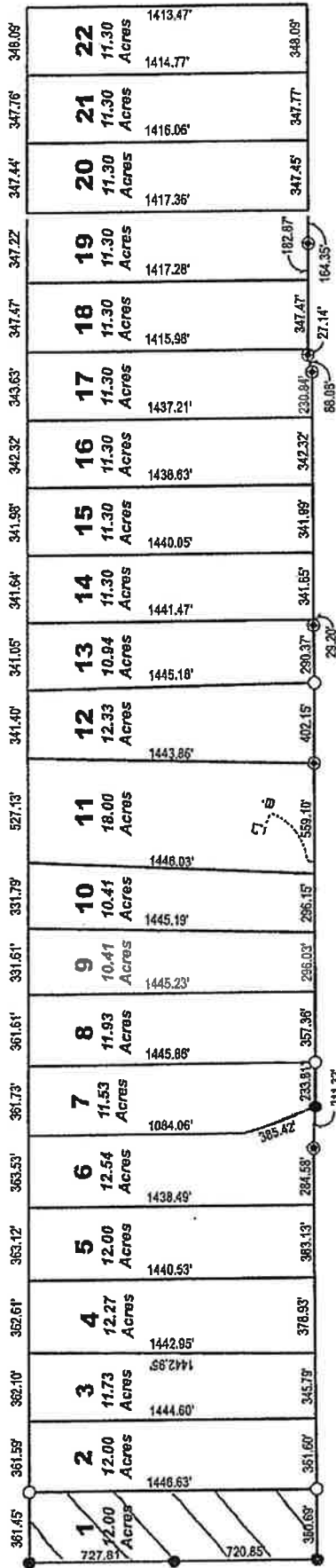
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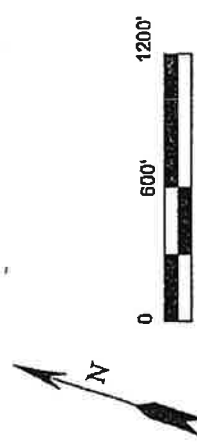
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1797
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Exhibit A



County Road 236



Application Exhibit 40

North San Gabriel Alliance's Reply to Responses

TCEQ DOCKET NO. 2022-1552-AIR

APPLICATION BY EXFLUOR	§	BEFORE THE
RESEARCH CORPORATION	§	
FOR AIR QUALITY PERMIT	§	TEXAS COMMISSION ON
NO. 165848 IN WILLIAMSON	§	
COUNTY, TEXAS	§	ENVIRONMENTAL QUALITY

**NORTH SAN GABRIEL ALLIANCE’S REPLY TO RESPONSES TO HEARING
REQUESTS AND REQUESTS FOR RECONSIDERATION**

TO THE HONORABLE COMMISSIONERS:

North San Gabriel Alliance (“NSGA”) hereby submits this Reply to the Responses to Hearing Requests and Requests for Reconsideration by Exflur Research Corporation (“Exflur” or “Applicant”), the Executive Director (“ED”), and the Office of Public Interest Counsel (“OPIC”) regarding the Application by the Exflur Research Corporation for Proposed Air Quality Permit No. 165848. The Commission should find that the organization NSGA, as well as several individual requestors, including but not limited to, Ann Friou, Charles O. McCormick, Patricia McCormick Mulvihill & Hank Mulvihill, and Margaret “Peggy” Anne McCormick Wardlaw are “affected persons” and should grant their hearing requests. The Commission should refer no less than 16 issues, described fully below, to the State Office of Administrative Hearings (“SOAH”) for a hearing.

I. Applicant Exflur Misconstrues the Standing Test but Acknowledges the Commission’s Precedent.

In its response, Applicant misconstrues the test for standing, by suggesting that its emissions of air pollutants from its proposed facility does not constitute a concrete,

particularized, actual or imminent injury.¹ In making this suggestion, Applicant cites to *Texas Disposal Systems Landfill, Inc. v. Tex. Commission on Environmental Quality*, 259 S.W.3d 361, 363-64 (Tex. App.—Amarillo 2008, no pet.). But in the *TDSL, Inc.* case, the requestor was a competitor to the landfill company seeking a permit modification from TCEQ, and the requestor’s alleged injury was that the permit modification sought, if also granted to other landfill companies, was one that would may mean the requestor was no longer able to financially compete with the other landfill companies.² The Court found that, because of the number of events that would need to occur before the purported injury may befall the requestor, the injury amounted to mere speculation.³ This is wholly distinguishable from the case at hand.

Here, it is Exflur’s emissions, which all parties acknowledge will be authorized under the proposed permit, that would constitute a concrete, particularized, actual or imminent injury to requestors, who own and use property in near vicinity. The standing test is not whether the Requestors will, in fact, be harmed by the Exflur facility, particularly its air emissions, but, rather, whether Requestors are at elevated risk, compared to members of the general public, of such harms. The “likely impact” is just that—the *likely* impact, not the *certain* impact—and it is but one factor the Commission must consider.

The Applicant’s argument against granting some hearing requests really pertains to distance from the proposed facilities. The Applicant acknowledges that Commission

¹ Applicant Exflur Research Corporation’s Response to Hearing Requests and Requests for Reconsideration (hereinafter, “Applicant’s Response”) at 8.

² *Texas Disposal Systems Landfill, Inc. v. Tex. Commission on Environmental Quality*, 259 S.W.3d 361, 363-64 (Tex. App.—Amarillo 2008, no pet.).

³ *Id.* at 364.

precedent has been to grant all hearing requests for requesters who own property within one mile from the proposed facilities, and then to look beyond one mile to determine whether the likely impacts could extend further.⁴ The Applicant does not argue that any of those requests from requesters with a property interest within one mile should be denied, only that those from requesters beyond one mile should be denied.⁵ The Applicant's own map, taken from Williamson County Appraisal District ("WCAD"), depict properties owned by the following requesters as being within one mile from the proposed Exflur facilities: Ms. Friou (Map Parcel ID No. 5); Mr. Charles O. McCormick (Map Parcel ID No. 13); Mr. and Ms. Mulvihill (Map Parcel ID Nos. 20 and 21), and Ms. Wardlaw (Map Parcel ID No. 28-29). Thus, these requestors are at elevated risk, compared to members of the general public, of harm from the proposed Exflur emissions.

II. Requestors are "Affected Persons."

a. Requestors have demonstrated a personal justiciable interest.

North San Gabriel Alliance. As each of the responses acknowledge, NSGA submitted several timely hearing requests, based on timely comments that were not withdrawn.⁶ Only the Applicant argues against NSGA's hearing request being granted, and only if NSGA cannot provide documentation of the organization's purpose and documentation that at least one of its members identified in its hearing request is the same

⁴ Applicant's Response at 7.

⁵ *Id.* at 9.

⁶ Executive Director's Response to Hearing Requests and Requests for Reconsideration (hereinafter, "ED's Response") at 31; The Office of Public Interest Counsel's Response to Hearing Requests and Requests for Reconsideration (hereinafter, "OPIC's Response") at 6-7; Applicant's Response at 11-12 (objecting to NSGA being named an affected person only based on whether the organization has demonstrated its purpose is germane to the Application and that one or more members has a legal property interest).

person identified in the WCAD records. NSGA does not agree that these valid objections to NSGA's hearing request, but nevertheless, provides the following support documents.

Included with this Reply as **Attachment A** is the Declaration of Patricia McCormick Mulvihill. Ms. Mulvihill's declaration provides documentation of NSGA's purpose, as on file with the Texas Secretary of State. Applicant has attempted to characterize NSGA's purpose as "generalized" but fails to explain why a generalized purpose means the interest it seeks to protect by contesting the Application is not germane to its purpose. In fact, its purpose is not generalized—NSGA is a non-profit membership organization representing its members to protect natural environment, homes, crops, animals, and property in the area of the North Fork of the San Gabriel River in Williamson and Burnet Counties. Its interests clearly include protecting the geographic area where the Exflor facility is proposed from air emissions that could harm the natural environment, people's homes, their crops and animals. Contesting the Exflor Application is most definitely germane to this interest.

Ms. Mulvihill's declaration also provides her verification that she is a member of the NSGA and the same person identified with the same name in the WCAD property records as being one of the trustees of the Mulvihill Children's Trust in proximity of the proposed Exflor facility. She even verifies that the property the Applicant identified in the WCAD property as this property is correct.⁷

⁷ The ED's assigned her property interest to another tract he called the "McCormick Ranch." Though the Mulvihill's do have an interest in this property, the property owned by the Mulvihill Children's Trust is just south of the McCormick Ranch, and closer to the Exflor property.

Included as **Attachment B** is the Declaration of Margaret Peggy Anne McCormick Wardlaw providing verification that she is a member of the NSGA and the same person identified with the same name in the WCAD property records as having a property in the proximity of the proposed Exfluor facility.

Having provided evidence that at least one member would have standing on their own, NSGA need not provide evidence that other members would also have standing.⁸

Patricia McCormick Mulvihill & Henry N. Mulvihill. Each of the responses to hearing requests also acknowledge that Patricia McCormick Mulvihill submitted comments and a timely hearing request.⁹ Again, only the Applicant argues against Ms. Mulvihill's hearing request being granted.¹⁰ The Applicant's opposition, it argues, is because Ms. Mulvihill did not provide documentation verifying she is the same Patricia McCormick Mulvihill named as a Trustee on the Mulvihill Children's Trust property. Though NSGA maintains this "verification" is not necessary for the Commission to refer her request to SOAH, Ms. Mulvihill has provided it through her declaration, included with this Reply as Attachment A.

The other basis for Applicant's opposition to Ms. Mulvihill's hearing request is, it argues, because Ms. Mulvihill's comments do not support her hearing request.¹¹ This is both not true, and an attempt to enlarge what the TCEQ rules actually require. Under TCEQ's rules, the hearing request must simply be based on the requestor's timely

⁸ In the unlikely event that the Commission determines that more evidence is necessary, NSGA's affected person determination should be referred to SOAH to allow the NSGA to offer evidence during the evidentiary hearing.

⁹ ED's Response at 17-18; OPIC's Response at 2; Applicant's Response at 20-21.

¹⁰ Applicant's Response at 20-21.

¹¹ Applicant's Response at 21.

comments by raising the issues that were raised during the comment period by the affected person in the hearing request.¹² In her timely comments submitted on April 1, 2022, Ms. Mulvihill raised the issues of air and water pollution from the chemical processing, and her concern that the pollution would affect family residences, including historical farms, ranches, and homes, water recreation areas, agricultural lands, and wildlife conservation areas. She also commented that “[t]oxic chemical pollution from such a facility could permanently affect people, homes, land, and agriculture nearby.” Then, in her timely hearing request submitted on October 13, 2022, she elaborated on how she still believed the pollution would impact her health, particularly because she is in treatment for breast cancer, having undergone a double mastectomy in June, and having early onset osteoarthritis. Her comments spoke directly to her concern that the facility could “permanently affect people” and her hearing request raised the issue of her own health and the health of her family and guests. Thus, her hearing request was timely and should be granted.

Finally, the Declaration of Patricia McCormick Mulvihill also clarifies that she and Henry N. Mulvihill are married and thus, her comments, hearing request, and justiciable interest (property interest) are one in the same. Therefore, the Commission should grant the hearing requests of Patricia McCormick Mulvihill and Henry N. Mulvihill.

Margaret “Peggy” Anne McCormick Wardlaw. Peggy Wardlaw’s request should be granted. Included with her declaration in Attachment B is the necessary documentation

¹² 30 Tex. Admin. Code § 55.201(c); 55.211(c).

verifying that she has an interest in the McCormick Ranch property, as well as a gift deed indicating that Margaret “Peggy” Ann McCormick Wardlaw owns a separate 30.227 acre tract of land. According to WCAD records referenced by the Applicant and used in the Applicant’s map (Map Parcel ID Nos. 28 and 29), the property owned by Margaret Wardlaw is one in the same—and Ms. Wardlaw verifies these are the same properties. The ED acknowledges Ms. Wardlaw’s interest in the McCormick Ranch property, and that Ms. Wardlaw indicated she owned “a 30 acre parcel just across CR 306.” But the ED was simply unable to locate the second property.¹³

The Applicant’s map, together with this supporting documentation, is sufficient to demonstrate ownership for purposes of determining that Ms. Wardlaw has a property interest within one mile of the proposed facility. Furthermore, Ms. Wardlaw’s hearing request explains in detail, the extent to which she and her family, including her grandchildren, use the property. Therefore, it is sufficient to determine that Ms. Wardlaw is an affected person and her hearing request should be granted.

Charles O. McCormick. The same gift deed conveying property to Peggy Wardlaw also conveyed property to Charles O. McCormick. The Applicant was able to identify on the WCAD the tract owned by Mr. Charles O. McCormick (Map Parcel ID No. 13), separate from the McCormick Ranch tract, and the Williamson County property records indicate this is the same tract. Therefore, Mr. Charles O. McCormick’s hearing request should be granted.

¹³ ED’s Response at 21.

Ann Friou. As has already been provided in NSGA's request and Ms. Friou's individual request, Ann Friou is a member of the North San Gabriel Alliance. Ms. Friou has separate counsel who filed a separate hearing request on her behalf, but consistent with the position of NSGA, no further documentation is required at this time.

NSGA maintains that no property interest is required in order to demonstrate a personal justiciable interest. And even if a property interest is asserted in a hearing request, the only information that must be produced at this time, is that which is necessary for the Commission to determine the requester's proximity to the proposed facility. Nevertheless, should the Commission determine that additional documentation is required, rather than reject the hearing request, the appropriate action would be to refer standing to SOAH for affected person determination at the preliminary hearing, which is an evidentiary hearing.

III. The Commission Should Refer Sixteen Issues to SOAH.

NSGA agrees with the list of fourteen (14) issues the ED recommends be referred to SOAH for a hearing, and would add two more, which were identified by the Applicant, and are supported, since the Commission should grant the hearing requests of Ms. Wardlaw and Mr. Charles O. McCormick.¹⁴

1. Whether an exhaust monitoring system that measures and records emissions in real time with alarms to alert emergency services be installed. (Charles O. McCormick)
2. Whether the state and federal health effects evaluations were properly conducted. (Margaret "Peggy" Ann Wardlaw)

¹⁴ Applicant's Response at 28.

IV. Conclusion

For the reasons stated above, NSGA respectfully requests that the Commission grant these hearing requests and refer these sixteen issues to the State Office of Administrative Hearings.

Respectfully submitted,

/s/ Lauren Ice

Lauren Ice

State Bar No. 24092560

Lauren@txenvirolaw.com

PERALES, ALLMON & ICE, P.C.

1206 San Antonio Street

Austin, Texas 78701

Tel. (512) 469-6000

Fax (512) 482-9346

COUNSEL FOR

NORTH SAN GABRIEL ALLIANCE

CERTIFICATE OF SERVICE

I hereby certify that, on December 5, 2022, a true and correct copy of the foregoing document was electronically filed with the Chief Clerk of TCEQ, and that copies were served upon the following parties via deposit in the U.S. mail or e-mail.

/s/ Lauren Ice

Lauren Ice

MAILING LIST
TCEQ DOCKET NO. 2022-1552-AIR

FOR THE APPLICANT:

Derek L. Seal
McGinnis Lochridge
1111 West 6th Street, Suite 400
Austin, Texas 78701
dseal@mcginnislaw.com

FOR THE EXECUTIVE DIRECTOR:

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FOR THE CHIEF CLERK:

Docket Clerk
Texas Commission on Environmental Quality
Office of Chief Clerk, MC-105
P.O. Box 13087
Austin, Texas 78711-3087
Tel: (512) 239-3300
Fax: (512) 239-3311
<https://www14.tceq.texas.gov/epic/eFiling>

**FOR ALTERNATIVE DISPUTE
RESOLUTION:**

Kyle Lucas, Attorney
Texas Commission on Environmental
Quality
Alternative Dispute Resolution, MC-222
P.O. Box 13087
Austin, Texas 78711
Kyle.lucas@tceq.texas.gov

ATTACHMENT A

TCEQ DOCKET NO. 2022-1552-AIR

APPLICATION BY EXFLOUR	§	BEFORE THE
RESEARCH CORPORATION	§	
FOR AIR QUALITY PERMIT	§	TEXAS COMMISSION ON
NO. 165848 IN WILLIAMSON	§	
COUNTY, TEXAS	§	ENVIRONMENTAL QUALITY

DECLARATION OF PATRICIA MCCORMICK MULVIHILL
IN SUPPORT OF NORTH SAN GABRIEL ALLIANCE'S REPLY TO RESPONSES TO
HEARING REQUESTS AND REQUESTS FOR RECONSIDERATION

1. My name is Patricia McCormick Mulvihill. I am over eighteen (18) years of age and of sound mind, have never been convicted of a felony, and am otherwise capable of making this declaration. The facts stated in this declaration are within my personal knowledge and are true and correct.
2. I am married to Henry N. Mulvihill, Jr. My husband and I live at 8 Lundy's Lane, Richardson, Texas 75080.
3. I am one of the three founding board members of the North San Gabriel Alliance and I currently serve as the president of the board of directors.
4. The North San Gabriel Alliance is a nonprofit membership organization and I am also a member of the organization.
5. The purpose of the North San Gabriel Alliance is to protect the natural environment, homes, crops, animals, and property of people who live, work, farm, ranch, and recreate in the area of the North Fork of the San Gabriel River in Williamson and Burnet Counties, Texas. With this purpose as its focus, North San Gabriel Alliance will represent its members by participating in the decision-making processes of local, state, and federal officials on issues related to pollution and protection of natural resources and the local environment. North San Gabriel Alliance will represent its members in government proceedings and in court, if necessary, in pursuit of its purpose.
6. The North San Gabriel Alliance was formed in early 2022 and formally incorporated on February 28, 2022. Attached as **Exhibit 1** to this declaration is a copy of the organization's Certificate of Filing and the Certification of Formation that is on file with the Texas Secretary of State. Exhibit 1 is a true and correct copy of the North San Gabriel Alliance's Certificate of Filing and Certification of Formation.

7. I am the same Patricia McCormick Mulvihill that is listed as a director of the North San Gabriel Alliance on the Certification of Formation that is on file with the Texas Secretary of State.
8. My husband, Henry N. Mulvihill, Jr., and myself are the only two trustees of the Mulvihill Children's Trust.
9. The Mulvihill Children's Trust is a trust for our children. The Trust owns a parcel of property about 31 acres in size at 1050 County Road 208, Florence, Texas 76527. Attached as **Exhibit 2** is a copy of the deed for the property owned by the Mulvihill Children's Trust. Exhibit 2 is a true and correct copy of the deed.
10. I submitted comments to the TCEQ regarding the application by Exflur Research Corporation for an air permit number 165848. I submitted written comments in April 2022 and October 2022.
11. I also authorized the attorney for North San Gabriel Alliance to identify me as a member in the requests for a contested hearing submitted on behalf of the organization.
12. I have seen the maps that Exflur included with its response to my request for a contested case hearing and the request filed on behalf of the North San Gabriel Alliance. I am the same Patricia McCormick Mulvihill, who is a Trustee of Mulvihill Children's Trust, owner of the map parcels marked as 20 and 21. Attached as **Exhibit 3** is Exflur's map for reference.
13. I have also seen the map that the Executive Director included with his response to my request for a contested case hearing and the request filed by the North San Gabriel Alliance. The Mulvihill Children's Trust property does not appear on this map, but is directly south of the map parcel marked as 15, making it closer to the Exflur site. Attached as **Exhibit 4** is the ED's map for reference.

My Name is Patricia McCormick Mulvihill, my date of birth is September, 3 1963, and my address is 8 Lundy's Lane, Richardson, Texas, 75080, United States of America.

I declare under penalty of perjury that the foregoing is true and correct.

Executed in Dallas County, State of Texas, on the 4 day of December, 2022.

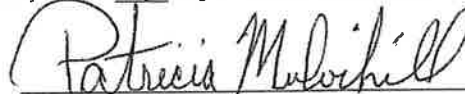

Patricia McCormick Mulvihill

Exhibit 1
Certificate of Formation for
NSGA



Office of the Secretary of State

CERTIFICATE OF FILING OF

North San Gabriel Alliance
File Number: 804458275

The undersigned, as Secretary of State of Texas, hereby certifies that a Certificate of Formation for the above named Domestic Nonprofit Corporation has been received in this office and has been found to conform to the applicable provisions of law.

ACCORDINGLY, the undersigned, as Secretary of State, and by virtue of the authority vested in the secretary by law, hereby issues this certificate evidencing filing effective on the date shown below.

The issuance of this certificate does not authorize the use of a name in this state in violation of the rights of another under the federal Trademark Act of 1946, the Texas trademark law, the Assumed Business or Professional Name Act, or the common law.

Dated: 02/28/2022


Effective: 02/28/2022



A handwritten signature in black ink, appearing to read "John B. Scott".

John B. Scott
Secretary of State

Come visit us on the internet at <https://www.sos.texas.gov/>

<p>Form 202 (Revised 12/21)</p> <p>Submit in duplicate to: Secretary of State P.O. Box 13697 Austin, TX 78711-3697 512 463-5555</p> <p>Filing Fee: \$25</p>	<p style="font-size: small;">This space reserved for office use.</p>  <p>Certificate of Formation Nonprofit Corporation</p>
--	--

Article 1 – Entity Name and Type

The filing entity being formed is a nonprofit corporation. The name of the entity is:

North San Gabriel Alliance

Article 2 – Registered Agent and Registered Office

(See instructions. Select and complete either A or B and complete C.)

A. The initial registered agent is an organization (cannot be entity named above) by the name of:

OR

B. The initial registered agent is an individual resident of the state whose name is set forth below:

Bryce	P	McCormick	
<i>First Name</i>	<i>M.I.</i>	<i>Last Name</i>	<i>Suffix</i>

C. The business address of the registered agent and the registered office address is:

1250 County Road 208	Florence	TX	76527	
<i>Street Address</i>	<i>City</i>	<i>State</i>	<i>Zip Code</i>	

Article 3 – Management

The management of the affairs of the corporation is vested in the board of directors. The number of directors constituting the initial board of directors and the names and addresses of the persons who are to serve as directors until the first annual meeting of members or until their successors are elected and qualified are as follows:

A minimum of three directors is required.

Director 1				
Bryce	P	McCormick		
<i>First Name</i>	<i>M.I.</i>	<i>Last Name</i>	<i>Suffix</i>	
1250 County Road 208	Florence	TX	76527	USA
<i>Street or Mailing Address</i>	<i>City</i>	<i>State</i>	<i>Zip Code</i>	<i>Country</i>

Director 2				
Patricia		McCormick Mulvihill		
<i>First Name</i>	<i>M.I.</i>	<i>Last Name</i>		<i>Suffix</i>
8 Lundy's Lane	Richardson	TX	75080	USA
<i>Street or Mailing Address</i>	<i>City</i>	<i>State</i>	<i>Zip Code</i>	<i>Country</i>

Director 3				
Maude		Allen		
<i>First Name</i>	<i>M.I.</i>	<i>Last Name</i>		<i>Suffix</i>
1251 CR 208	Florence	TX	76527	USA
<i>Street or Mailing Address</i>	<i>City</i>	<i>State</i>	<i>Zip Code</i>	<i>Country</i>

OR

The management of the affairs of the corporation is to be vested in the nonprofit corporation's members.

Article 4 – Membership

(See instructions. Do not select statement B if the corporation is to be managed by its members.)

A. The nonprofit corporation shall have members.

B. The nonprofit corporation will have no members.

Article 5 – Purpose

(See instructions. This form does not contain language needed to obtain a tax-exempt status on the state or federal level.)

The nonprofit corporation is organized for the following purpose or purposes:

The purpose of North San Gabriel Alliance is to protect the natural environment, homes, crops, animals, and property of people who live, work, farm, ranch, and recreate in the area of the North Fork of the San Gabriel River, in Williamson and Burnet Counties, Texas. With this purpose as its focus, North San Gabriel Alliance will

The following text area may be used to include any additional language or provisions that may be needed to obtain tax-exempt status.

represent its members by participating in the decision-making processes of local, state, and federal officials on issues related to pollution and protection of natural resources and the local environment. North San Gabriel Alliance will represent its members in government proceedings and in court, if necessary, in pursuit of its purpose.

Initial Mailing Address

(Provide the mailing address to which state franchise tax correspondence should be sent.)

1250 County Road 208 Florence TX 76527 USA
Mailing Address City State Zip Code Country

Supplemental Provisions/Information

(See instructions.)

Text Area: [The attached addendum, if any, is incorporated herein by reference.]

[Empty text area box]

Organizer

The name and address of the organizer:

Bryce Philip McCormick

Name

1250 County Road 208 Florence TX 76527
Street or Mailing Address City State Zip Code

Effectiveness of Filing (Select either A, B, or C.)

- A. This document becomes effective when the document is filed by the secretary of state.
- B. This document becomes effective at a later date, which is not more than ninety (90) days from the date of signing. The delayed effective date is: _____
- C. This document takes effect upon the occurrence of a future event or fact, other than the passage of time. The 90th day after the date of signing is: _____

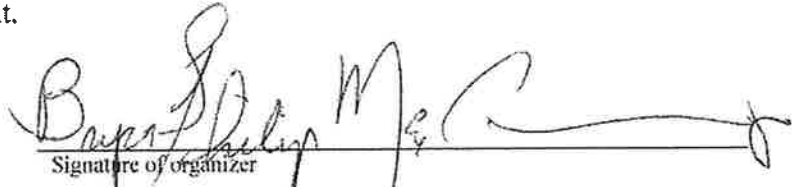
The following event or fact will cause the document to take effect in the manner described below:

[Empty text area box]

Execution

The undersigned affirms that the person designated as registered agent has consented to the appointment. The undersigned also affirms that, to the best knowledge of the undersigned, the name provided as the name of the filing entity does not falsely imply an affiliation with a governmental entity. The undersigned signs this document subject to the penalties imposed by law for the submission of a materially false or fraudulent instrument and certifies under penalty of perjury that the undersigned is authorized to execute the filing instrument.

Date: 2/25/2022



Signature of organizer

Bryce Philip McCormick

Printed or typed name of organizer

Print **Reset**

Exhibit 2

Deed for Property Owned by the Mulvihill Children's Trust



NOTICE OF CONFIDENTIALITY RIGHTS: IF YOU ARE A NATURAL PERSON, YOU MAY REMOVE OR STRIKE ANY OF THE FOLLOWING INFORMATION FROM THIS INSTRUMENT BEFORE IT IS FILED FOR RECORD IN THE PUBLIC RECORDS: YOUR SOCIAL SECURITY NUMBER OR YOUR DRIVER'S LICENSE NUMBER.

GIFT DEED TO THE CHILDREN

(McCormick Ranch East of County Road 208)

STATE OF TEXAS

§
§
§

KNOW ALL PERSONS BY THESE PRESENTS:

COUNTY OF WILLIAMSON

A. **Conveyance.** THAT **Charles A. McCormick** and **Joyce O'Neal McCormick** (who together with their heirs and assigns are hereinafter called "**Grantors**"), in consideration of the love and affection we have for our children, four of whom are the respective Grantees herein, and other good and valuable consideration including each of the respective Grantee's agreement to abide by the covenants, conditions and restrictions contained in the Declaration of Covenants, Conditions and Restrictions for McCormick Ranch (the "**Declaration**") executed by Grantors, which Declaration is found of record in the Official Records of Williamson County, Texas, and in consideration of the matters contained herein, have GIVEN AND GRANTED, and by these presents do hereby GIVE AND GRANT unto (1) each of our following three children and in the case of our child, Patricia McCormick Mulvihill, to Henry N. Mulvihill, Jr. and Patricia McCormick Mulvihill, Co-Trustees of the Mulvihill Children's Trust, as their respective sole and separate property and estate (each of whom together with such child's heirs and assigns are respectively referred to herein as the "**Grantee**" as to the respective Lot conveyed to such child, and collectively as the "**Grantees**") the surface estate in and to the following real property, together with all rights and appurtenances thereunto belonging (collectively, the "**Children's Property**" and the respective surface estate lot comprising the Children's Property as described on **Exhibits 1-4** below including all rights and appurtenances thereto belonging called a "**Lot**" and each Lot identified by numbers Lots 1 through 4 as identified in such exhibits):

Lot No.	Exhibit Description	Grantee
1	<u>Exhibit 1</u>	Elizabeth Joyce McCormick Benhalem (who together with her heirs and assigns is called the " Lot 1 Owner ")
2	<u>Exhibit 2</u>	Hazel Roberta McCormick Williams (who together with her heirs and assigns is called the " Lot 2 Owner ")
3	<u>Exhibit 3</u>	Charles O'Neal McCormick (who together with his heirs and assigns is called the " Lot 3 Owner ")
4	<u>Exhibit 4</u>	Henry N. Mulvihill, Jr. and Patricia McCormick Mulvihill, Co-Trustees of the Mulvihill Children's Trust (who together with its successors and assigns is called the " Lot 4 Owner ")

and (2) to the Grantee, as tenants in common in fee simple, as their respective sole and separate property and estate, the surface estate in and to the strip of land described in Exhibit 5 connecting Lot the Lots to County Road 208 (referred to herein as the "**East McCormick Ranch Road**"), [collectively, the "**Children's Property**" or the "**Property**"].

TO HAVE AND TO HOLD the Property to the Grantees, each as the Grantee's sole and separate property and estate, and unto such Grantee's heirs and assigns, forever, subject to the Qualifications referenced herein.

B. Qualifications. This conveyance is made and accepted, subject to the following qualifications ("**Qualifications**"):

1. **Recorded Exceptions.** Any and all covenants, conditions, easements, agreements, reservations, rights of way, restrictions and other instruments relating to the Property, including interests in the mineral estate and rights derivative thereof, to the extent they are still in effect and are of record (collectively, the "**Recorded Exceptions**") including but not limited to the Declaration and the Articles of Incorporation, Bylaws and all Rules and Regulations now or hereafter adopted by the McCormick Ranch Property Owners' Association, Inc. (the "**Association**") pursuant thereto (collectively, the "**Regulations**"). Each Grantee agrees to assume and perform all obligations of Grantors under the Recorded Exceptions and the Regulations applicable to the respective Property conveyed to such Grantee.

2. **Survey Matters.** Visible and apparent easements, if any; any encroachments, protrusions, or overlapping of improvements; and any discrepancies, conflicts, shortages in area or boundary lines.

3. **Possessory Interests.** Rights of parties in possession and the existing rights of adjoining owners in any fences situated on a common boundary, whether of record or not.

4. **Laws and Regulations.** Such zoning or other restrictions upon the use of the Property as may be imposed by governmental authorities having jurisdiction thereof.

5. **Taxes.** The liens for all governmental assessments and ad valorem taxes for the year 2005 and all subsequent years; the payment of which are hereby assumed by the Grantee of each Lot as to such Lot, and subsequent assessments for that and prior years due to change in land usage, ownership, or both, the payment of which the respective Grantee assumes as to the Property conveyed to such Grantee.

6. **As Is.** Grantors convey the Property and each Grantee accepts the Property so conveyed to such Grantee "AS IS". GRANTORS MAKE NO WARRANTY OR REPRESENTATION, EXPRESS OR IMPLIED, OR ARISING BY OPERATION OF LAW, INCLUDING ANY WARRANTY OF MERCHANTABILITY OR FITNESS FOR ANY PARTICULAR PURPOSE, OF THE PROPERTY, OR ANY PART THEREOF.

7. **Reservation of Minerals.** Grantors reserve unto themselves, their heirs and assigns, all of the oil, gas and other mineral substances, and/or deposits of any kind or character, whether similar or dissimilar, whether solid, liquid or gaseous, in or under or that may be mined, produced, removed, saved, or recovered from the Land (hereinafter being collectively referred to as the "**Minerals**"). The Minerals include without limitation by enumeration, all hydrocarbons, coal, lignite, sulphur, phosphate, iron ore, sodium, salt, uranium, thorium, molybdenum, vanadium, titanium, and other fissionable materials, gold, silver, magnesium, iron, bauxite, geothermal energy (including hydrostatic pressure and thermal energy), hard rock minerals and base precious metals; and the term "gas" shall include helium, carbon dioxide, gaseous sulfur compounds, coal bed methane, and any other commercial gaseous substances, as well as natural gas and other "normal" hydrocarbon gases. Grantors release and relinquish (such release and relinquishment being herein called the "**Surface Waiver**") unto the respective Grantee as a part of this conveyance to such Grantee of the Lot conveyed to such Grantee, all of Grantors' right to use the surface of the Lot and any portion of the Lot within the zone which is two hundred fifty feet (250') of the surface of the Lot or such to greater depth as is necessary to avoid surface subsidence (the "**Surface**") for exploring, drilling for, mining and producing the Minerals, including releasing and relinquishing the right of

ingress and egress in, over, under and across the Surface of the Lot for such purposes and releasing and relinquishing such Surface from operations in connection with mining, quarrying, exploring, drilling, testing, treating, processing, refining, producing, storing, transporting, completing, operation and/or developing of any of the Minerals or the erection of surface structures incident to such activities.

8. **Reservation of McCormick Ranch Road Expansions.** Grantors reserve unto themselves, and their heirs and assigns, an uninterrupted roadway right-of-way easement for access, ingress and egress in, over, along, under, above, and across strips of land 15' in width (the "***McCormick Ranch Road Expansions***") on each side of each of the East McCormick Ranch Road, which reserved easement is conveyed by Grantors to the Association by Assignment recorded in the Official Records of Williamson County, Texas. The McCormick Ranch Road Expansions include both surface level, below surface level and above surface level easement rights for all purposes in connection with access to the McCormick Ranch, including surface level roadways and above and below surface level drainage and utilities. These reserved easement rights are to be assigned by Grantors to the Association, its successors and assigns. Upon request of the Association the owner of the area encumbered by this roadway right-of-way easement covenants to convey the fee title of the area to the Association by general warranty deed. This covenant is a covenant running with the land and is binding on each Grantee's heirs and assigns.

9. **Rights of First Refusal.** Grantors reserve unto themselves, their heirs and assigns, and there is hereby granted to Grantors, their heirs and assigns, by each of the Grantees herein and binding on them and their heirs and assigns, as owners of the Children's Property conveyed to them by this Gift Deed, rights of first refusal, as set out in **Exhibit 6** hereto, which Exhibit is incorporated herein by this reference for all purposes.

10. **Waiver by Grantees of Inequalities between the Lots.** It is agreed by the parties hereto that any liens that would arise in favor of any party by operation of law, by reason of the partition of the Children's Property into separate Lots, including but not limited to the failure of the acreage included within any of the separate Lots to equal the prorata share otherwise allocable to such party or the failure to allocate such Lots to the parties in accordance with the respective market value of such segregated Lots, shall not exist in favor of any party against any other party; and any and all implied liens so arising are expressly waived and released by the parties hereto.

11. **Reservation of Life Estate.** Grantors reserve the following rights in and to the Property for on during their lifetime: grazing of cattle, horses and other farm and ranch animals by themselves or by those authorized by them.

DATED as of the 29th day of April, 2005.

GRANTORS:

Charles A. McCormick
Charles A. McCormick

Joyce O'Neal McCormick
Joyce O'Neal McCormick

STATE OF TEXAS

§
§
§

COUNTY OF TRAVIS

This instrument was acknowledged before me on the 29th day of April, 2005, by Charles A. McCormick.



Kellie Munson
NOTARY PUBLIC, State of Texas

STATE OF TEXAS

§
§
§

COUNTY OF TRAVIS

This instrument was acknowledged before me on the 29th day of April, 2005, by Joyce O'Neal McCormick.



Kellie Munson
NOTARY PUBLIC, State of Texas

RECORDERS MEMORANDUM

All or parts of the text on this page was not clearly legible for satisfactory recordation.

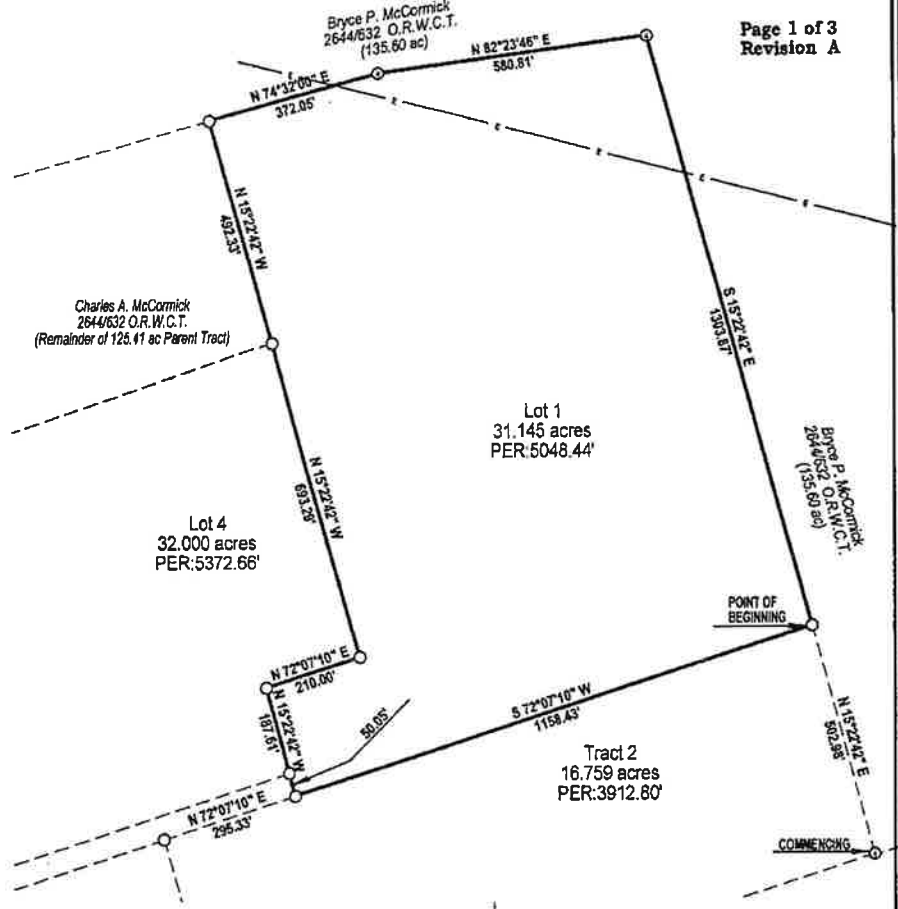
EXHIBIT 1

Description of Lot 1

Elizabeth Joyce McCormick Benhallem

SURVEY PLAT OF 31.145 ACRES OUT OF THE JOHN BAILEY SURVEY NO. 7, ABSTRACT NO. 55 IN WILLIAMSON COUNTY, TEXAS

Page 1 of 3
Revision A



LEGEND

⊙	1/2" Iron Rod Found
○	1/2" Iron Rod Set
▲	60D Nail Found
- - -	Adjoiner Line
Scale 1" = 300.00 Feet	



Situs Address
County Road 208
Williamson County, Texas
Prepared for Charles McCormick
Job # WILCO-0410-03A
OCT 18, 2004
Rev. APR 27, 2005

Deed per Vol. 2644, Pg. 632, Deed Records of Williamson County, Texas, Dated Nov. 26, 1994.
The Bearings recited herein are based on State Plane Coordinate System, Texas Central Grid.

Certificate

I, Danny J. Stark, do hereby certify that the foregoing Survey Plat was prepared from an actual survey made upon the ground, under my supervision, the Records of said county, and surveys of area properties, that the corners and boundaries with marks, natural and artificial are as shown or set on the ground, that discrepancies, conflicts, protrusions or intrusions, overlapping of improvements, or easements, visible to me are shown or described hereon, that said property has access to a non-dedicated roadway.

[Signature]
Danny J. Stark, R.P.L.S., State of Texas No. 5602



ABSTRACT SURVEYING
650 Lyda Ranch Road
Bertram, Texas, 78605
Ph 512-756-4500
Fx 512-756-0730

RECORDERS MEMORANDUM
All or parts of the text on this page was not clearly legible for satisfactory recordation.

Field Notes to accompany a Survey Plat of a 31.145 acre tract of land out of the John Bailey Survey No. 7, Abstract No. 55, in Williamson County, Texas.
Prepared for Charles A. McCormick, without benefit of Title Commitment.

Being a 31.145 acre tract of land out of the John Bailey Survey No. 7, Abstract No. 55, in Williamson County, Texas, and being a portion of that same tract of land, described as 125.41 acres, (herein referred to as "Parent Tract"), in a Partition Deed dated November 26, 1994, from Charles A. McCormick, Madge McCormick Smith, Bryce P. McCormick, and Margaret McCormick Russell, to Charles A. McCormick, of record in Volume 2644, Page 632, Official Records of Williamson County, Texas, said 31.145 acres (henceforth to be known as "Tract 1") being further described herein by metes and bounds as follows:

COMMENCING at a 1/2" iron rod found in the South line of the John Bailey Survey No 7, Abstract No. 55, and the North line of the John Caruthers Survey No. 6, Abstract No. 129, at the Southern most Southwest corner of a tract of land, described as 135.60 acres, in a Partition Deed dated November 26, 1994, from Charles A. McCormick, Madge McCormick Smith, Bryce P. McCormick, and Margaret McCormick Russell, to Bryce P. McCormick, of record in Volume 2644, Page 632, Official Records of Williamson County, Texas, in the Northern boundary line of a tract of land, described as "Tract Two", a 78.85 acre tract, in a Warranty Deed dated May 11, 2000, from Barry Lynn Bowden to B. L. & T. O. Bowden Living Trust, of record in Doc. No. 2001021161, Official Records of Williamson County, Texas, at the Southeast corner of the 125.41 acre Parent Tract, and the Southeast corner of "Tract 2", surveyed this date, THENCE N 15°22'42" W, with the Western boundary line of said 135.60 acre Bryce P. McCormick tract, a distance of 502.98 feet to a 1/2" iron rod set with plastic cap stamped "DJS-5602", for Northeast corner of said "Tract 2", surveyed this date, the Southeast corner of said "Tract 1" and TRUE POINT OF BEGINNING hereof;

THENCE S 72°07'10" W, crossing into the Parent Tract, with the Northern boundary line of said "Tract 2", surveyed this date, a distance of 1158.43 feet to a 1/2" iron rod set with plastic cap stamped "DJS-5602", for the Southeast corner of a 50.00 foot wide private roadway easement, and the Southwest corner hereof;

THENCE N 15°22'42" W, at 50.05 feet, a 1/2" iron rod set with plastic cap stamped "DJS-5602", for the Northeast corner of said 50.00 foot wide private roadway easement, and the Southern most Southeast corner of "Tract 4", surveyed this date, in all a distance of 237.66 feet to a 1/2" iron rod set with plastic cap stamped "DJS-5602", for a reentrant corner of said "Tract 4, surveyed this date, and an angle point hereof;

THENCE N 72°07'10" W, a distance of 210.00 feet to a 1/2" iron rod set with plastic cap stamped "DJS-5602", for the Eastern most Southeast corner of said "Tract 4, surveyed this date, and a reentrant corner hereof;

THENCE N 15°22'42" W, at a distance of 93.29 feet, a 1/2" iron rod set with plastic cap stamped "DJS-5602", for the Northeast corner of said "Tract 4, surveyed this date, in all a distance of 1,185.62 to a 1/2" iron rod set with plastic cap stamped "DJS-5602", in the Southern boundary line of said 135.60 acre Bryce P. McCormick tract, and the Northwest corner hereof;

THENCE N 74°32'00" E, with the Southern boundary line of said 135.60 acre Bryce P. McCormick tract, a distance of 372.05 feet, to a 1/2" iron rod found for an angle point hereof;

THENCE N 82°23'46" E, a distance of 580.81 feet, to a 1/2" iron rod found at a reentrant corner of said 135.60 acre Bryce P. McCormick tract, the Northeast corner of the Parent Tract and the Northeast Corner hereof;

THENCE S 15°22'42" E, with the Western boundary line of said 135.60 acre Bryce P. McCormick tract, a distance of 1,303.87 feet, to the POINT OF BEGINNING hereof, and calculated to contain 31.145 acres.

The Basis of Bearing for this Survey is the State Plane Coordinate System, Texas Central Grid.

CERTIFICATE

I, Danny J. Stark, hereby certify that the foregoing Field Notes and accompanying Survey Plat were prepared from an actual survey made upon the ground, the Records of said county, and surveys of area properties, that the corners and boundaries with marks natural and artificial are as found or set on the ground, that discrepancies, conflicts, protrusions or intrusions, overlapping of improvements, easements, visible or apparent to me are shown or described on the plat.

Danny J. Stark, R.P.L.S.
State of Texas No. 5602
Job No. WILCO-0410-03A



ABSTRACT SURVEYING
650 Lyda Ranch Road, Bertram, TX 78605
Ph 512-756-4500/Fx 512-756-0730

RECORDERS MEMORANDUM
All or parts of the text on this page was not clearly legible for satisfactory recordation.

EXHIBIT 2

Description of Lot 2

Hazel Roberta McCormick Williams

October 8, 2004
Revised April 27, 2005
STATE OF TEXAS:
COUNTY OF WILLIAMSON:

Revision A

Field Notes to accompany a Survey Plat of a 16.759 acre tract of land out of the John Bailey Survey No. 7, Abstract No. 55, in Williamson County, Texas.
Prepared for Charles A. McCormick, without benefit of Title Commitment.

Being a 16.759 acre tract of land out of the John Bailey Survey No. 7, Abstract No. 55, in Williamson County, Texas, and being a portion of that same tract of land, described as 125.41 acres, (herein referred to as "Parent Tract"), in a Partition Deed dated November 26, 1994, from Charles A. McCormick, Madge McCormick Smith, Bryce P. McCormick, and Margaret McCormick Russell, to Charles A. McCormick, of record in Volume 2644, Page 632, Official Records of Williamson County, Texas, said 16.759 acres (henceforth to be known as "Tract 2") being further described herein by metes and bounds as follows:

BEGINNING at a 1/2" iron rod found in the South line of the John Bailey Survey No 7, Abstract No. 55, and the North line of the John Caruthers Survey No. 6, Abstract No. 129, at the Southern most Southwest corner of a tract of land, described as 135.60 acres, in a Partition Deed dated November 26, 1994, from Charles A. McCormick, Madge McCormick Smith, Bryce P. McCormick, and Margaret McCormick Russell, to Bryce P. McCormick, of record in Volume 2644, Page 632, Official Records of Williamson County, Texas, in the Northern boundary line of a tract of land, described as "Tract Two", a 78.85 acre tract, in a Warranty Deed dated May 11, 2000, from Barry Lynn Bowden to B. L. & T. O. Bowden Living Trust, of record in Doc. No. 2001021161, Official Records of Williamson County, Texas, at the Southeast corner of the 125.41 acre Parent Tract and the Southeast corner hereof;

THENCE S 72°08'43"W, with the South line of the John Bailey Survey No 7, Abstract No. 55, the North line of the John Caruthers Survey No. 6, Abstract No. 129, and the Northern boundary line of said "Tract Two", a 78.85 acre B. L. & T. O. Bowden Living Trust tract, a distance of 1,453.73 feet to a 1/2" iron rod set with plastic cap stamped "DJS-5602", for the Southeast corner of "Tract 3", surveyed this date, and the Southwest corner hereof;

THENCE N 15°22'42" W, crossing into the Parent Tract, with the Eastern boundary line of said Tract 3", surveyed this date, a distance of 502.33 feet to a 1/2" iron rod set with plastic cap stamped "DJS-5602", in the South Right of Way line of a 50.00 foot wide private roadway easement, for the Northeast corner of said "Tract 3", surveyed this date, and the Northwest corner hereof;

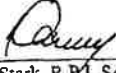
THENCE N 72°07'10" E, with the South Right of Way line of said 50.00 foot wide private roadway easement, at 295.33 feet, a 1/2" iron rod set with plastic cap stamped "DJS-5602", for the Southwest corner of "Tract 3", surveyed this date, in all a distance of 1,253.76 feet to a 1/2" iron rod set with plastic cap stamped "DJS-5602", in the Western boundary line of said 135.60 acre Bryce P. McCormick tract, for Southeast corner of said "Tract 1", surveyed this date, the Northeast corner hereof;

THENCE S 15°22'42" E, with the Western boundary line of said 135.60 acre Bryce P. McCormick tract, a distance of 502.98 feet, to the POINT OF BEGINNING hereof, and calculated to contain 16.759 acres.

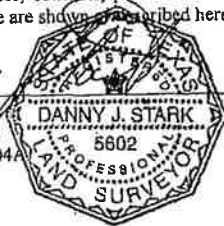
The **Basis of Bearing** for this Survey is the State Plane Coordinate System, Texas Central Grid.

CERTIFICATE

I, Danny J. Stark, hereby certify that the foregoing Field Notes and accompanying Survey Plat were prepared from an actual survey made upon the ground, the Records of said county, and surveys of area properties, that the corners and boundaries with marks natural and artificial are as found or set on the ground, that discrepancies, conflicts, protrusions or intrusions, overlapping of improvements, easements, visible or apparent to me are shown and described hereon.



Danny J. Stark, R.P.L.S.
State of Texas No. 5602
Job No. WILCO-0410-04



ABSTRACT SURVEYING
650 Lyda Ranch Road, Bertram, TX 78605
Ph 512-756-4500/Fx 512-756-0730

RECORDERS MEMORANDUM
All or parts of the text on this page was not
clearly legible for satisfactory recordation.

EXHIBIT 3

Description of Lot 3

Charles O'Neal McCormick

October 8, 2004
Revised April 27, 2005
STATE OF TEXAS:
COUNTY OF WILLIAMSON:

Revision A

Field Notes to accompany a Survey Plat of a 16.759 acre tract of land out of the John Bailey Survey No. 7, Abstract No. 55, in Williamson County, Texas.
Prepared for Charles A. McCormick, without benefit of Title Commitment.

Being a 16.759 acre tract of land out of the John Bailey Survey No. 7, Abstract No. 55, in Williamson County, Texas, and being a portion of that same tract of land, described as 125.41 acres, (herein referred to as "Parent Tract"), in a Partition Deed dated November 26, 1994, from Charles A. McCormick, Madge McCormick Smith, Bryce P. McCormick, and Margaret McCormick Russell, to Charles A. McCormick, of record in Volume 2644, Page 632, Official Records of Williamson County, Texas, said 16.759 acres (henceforth to be known as "Tract 3") being further described herein by metes and bounds as follows:

COMMENCING at a 1/2" iron rod found in the South line of the John Bailey Survey No 7, Abstract No. 55, and the North line of the John Caruthers Survey No. 6, Abstract No. 129, at the Southern most Southwest corner of a tract of land, described as 135.60 acres, in a Partition Deed dated November 26, 1994, from Charles A. McCormick, Madge McCormick Smith, Bryce P. McCormick, and Margaret McCormick Russell, to Bryce P. McCormick, of record in Volume 2644, Page 632, Official Records of Williamson County, Texas, in the Northern boundary line of a tract of land, described as "Tract Two", a 78.85 acre tract, in a Warranty Deed dated May 11, 2000, from Barry Lynn Bowden to B. L. & T. O. Bowden Living Trust, of record in Doc. No. 2001021161, Official Records of Williamson County, Texas, the Southeast corner of the 125.41 acre Parent Tract, and the Southeast corner of "Tract 2", surveyed this date, THENCE S 72°08'43" W, with the Northern boundary line of said "Tract Two", a 78.85 acre B. L. & T. O. Bowden Living Trust tract, a distance of 1,453.73 feet to a 1/2" iron rod set with plastic cap stamped "DJS-5602", for the Southwest corner of said "Tract 2", surveyed this date, the Southeast corner of said "Tract 3" and TRUE POINT OF BEGINNING hereof;

THENCE S 72°08'43" W, continuing with the Northern boundary line of said "Tract Two", a 78.85 acre B. L. & T. O. Bowden Living Trust tract, a distance of 1,630.41 feet to a 1/2" iron rod found, in the East Right of Way of County Road No. 208, at the Southwest corner of the Parent Tract, and the Southwest corner hereof;

THENCE with the East Right of Way of County Road No. 208, the following seven (7) courses and distances:

1. N 8°07'43" E, a distance of 58.87 feet, to a 1/2" iron rod found, for angle point hereof;
2. N 18°20'02" E, a distance of 113.88 feet, to a 1/2" iron rod found, for angle point hereof;
3. N 23°40'31" E, a distance of 187.19 feet, to a fence corner post found, for angle point hereof;
4. N 20°04'10" E, a distance of 81.89 feet, to a 1/2" iron rod found, for angle point hereof;
5. N 13°06'22" E, a distance of 82.10 feet, to a 1/2" iron rod found, for angle point hereof;
6. N 38°03'10" E, a distance of 85.02 feet, to a 1/2" iron rod found, for angle point hereof; and
7. N 19°07'11" W, a distance of 33.68 feet, to a 1/2" iron rod set with plastic cap stamped "DJS-5602", at the intersection of the East Right of Way line of County Road No. 208, and the South Right of Way line of a 50.00 foot wide private roadway easement, for the Northwest corner hereof;

THENCE N 72°07'10" E, with the South Right of Way line of said 50.00 foot wide private roadway easement, a distance of 1,272.74 feet, to a 1/2" iron rod set with plastic cap stamped "DJS-5602", for the Northwest corner of said "Tract 2", surveyed this date, and the Northeast corner hereof;

THENCE S 15°22'42" E, with the Western boundary line of said "Tract 2", surveyed this date, a distance of 502.33 feet, to the POINT OF BEGINNING hereof, and calculated to contain 16.759 acres.

The Basis of Bearing for this Survey is the State Plane Coordinate System, Texas Central Grid.

CERTIFICATE

I, Danny J. Stark, hereby certify that the foregoing Field Notes and accompanying Survey Plat were prepared from an actual survey made upon the ground, the Records of said county, and surveys of area properties, that the corners and boundaries with marks natural and artificial are as found or set on the ground, that discrepancies, conflicts, protrusions or intrusions, overlapping of improvements, easements, visible or apparent to me are shown or described hereon.

Danny J. Stark, R.P.L.S.
State of Texas No. 5602
Job No. WILCO-0410-03

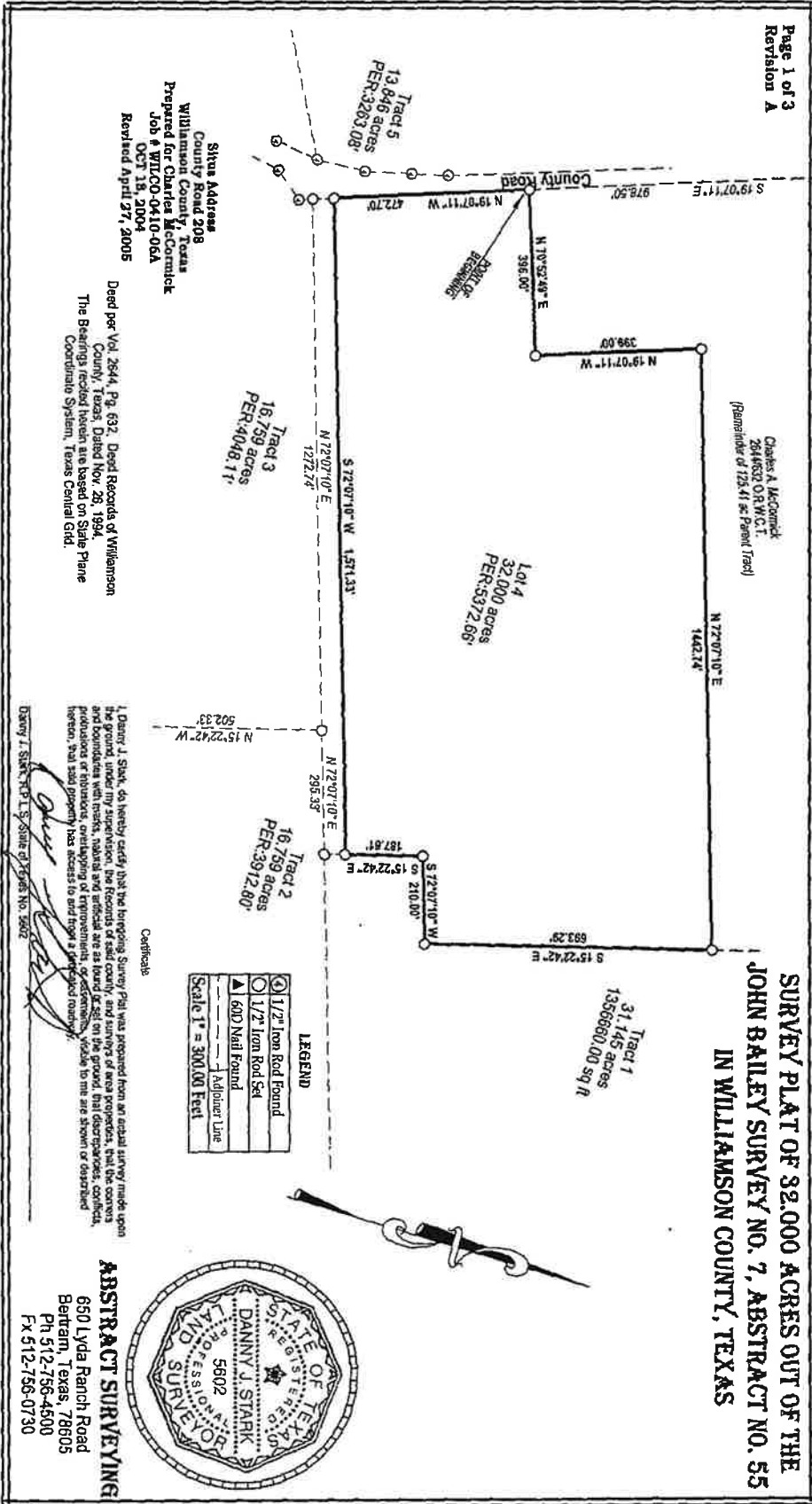


ABSTRACT SURVEYING
650 Lyda Ranch Road, Bertram, TX 78605
Ph 512-756-4500/Fx 512-756-0730

EXHIBIT 4

Description of Lot 4

Patricia McCormick Mulvihill



Situs Address
County Road 208
Williamson County, Texas
Prepared for Charles McCormick
Job # WTCOD-0410-06A
OCT 19, 2004
Revised April 27, 2005

Dead per Vol. 2844, Pg. 632, Deed Records of Williamson
County, Texas, Dated Nov. 28, 1894.
The Bearings recited herein are based on State Plane
Coordinate System, Texas Central Grid.

I, Danny J. Stark, do hereby certify that the foregoing Survey/Plat was prepared from an actual survey made upon the land hereon shown, and that the bearings, distances and boundaries with marks, natural and artificial are as found or set on the ground, that discrepancies, conflicts, contradictions or objections, overlapping of improvements, or encroachments, visible to me are shown or described hereon, that said property has access to said highway as indicated on this plat.

Danny J. Stark, P.E., L.S., State of Texas No. 5602

ABSTRACT SURVEYING
650 Lyda Ranch Road
Bertonia, Texas 78605
Ph 512-756-4500
Fx 512-756-0730



RECORDERS MEMORANDUM
All or parts of the text on this page was not clearly legible for satisfactory recordation.

October 8, 2004
Revised April 27, 2005
STATE OF TEXAS:
COUNTY OF WILLIAMSON:

Revision A

Field Notes to accompany a Survey Plat of a 32.000 acre tract of land out of the John Bailey Survey No. 7, Abstract No. 55, in Williamson County, Texas.
Prepared for Charles A. McCormick, without benefit of Title Commitment.

Being a 32.000 acre tract of land out of the John Bailey Survey No. 7, Abstract No. 55, in Williamson County, Texas, and being a portion of that same tract of land, described as 125.41 acres, (herein referred to as "Parent Tract"), in a Partition Deed dated November 26, 1994, from Charles A. McCormick, Madge McCormick Smith, Bryce P. McCormick, and Margaret McCormick Russell, to Charles A. McCormick, of record in Volume 2644, Page 632, Official Records of Williamson County, Texas, said 31.000 acres (henceforth to be known as "Tract 4") being further described herein by metes and bounds as follows:

COMMENCING at a 1/2" iron rod found, in the East Right of Way of County Road No. 208, at the Western most Southwest corner of a tract of land, described as 135.60 acres, in a Partition Deed dated November 26, 1994, from Charles A. McCormick, Madge McCormick Smith, Bryce P. McCormick, and Margaret McCormick Russell, to Bryce P. McCormick, of record in Volume 2644, Page 632, Official Records of Williamson County, Texas, at the Northwest corner of the 125.41 acre Parent Tract, THENCE S 19°07'11" E, with the East Right of Way of County Road No. 208, and the Western boundary line of the Parent Tract, a distance of 978.50 feet, to a 1/2" iron rod set with plastic cap stamped "DJS-5602", for the Western most Northwest corner and TRUE POINT OF BEGINNING hereof;

THENCE N 70°52'49" E, crossing into the Parent Tract, a distance of 396.00 feet to a 1/2" iron rod set with plastic cap stamped "DJS-5602", for a reentrant corner hereof;

THENCE N 19°07'11" W, a distance of 399.00 feet to a 1/2" iron rod set with plastic cap stamped "DJS-5602", for the Northern most Northwest corner hereof;

THENCE N 72°07'10" E, a distance of 1,442.74 feet, to a 1/2" iron rod set with plastic cap stamped "DJS-5602", in the Western boundary line of "Tract 1", surveyed this date, for the Northeast corner hereof;

THENCE S 15°22'42" E, with the Western boundary line of said "Tract 1", surveyed this date, a distance of 693.29 feet, to a 1/2" iron rod set with plastic cap stamped "DJS-5602", at a reentrant corner of said "Tract 1", surveyed this date, for the Eastern most Southeast corner hereof;

THENCE S 72°07'10" W, continuing with the Western boundary line of said "Tract 1", surveyed this date, a distance of 210.00 feet, to a 1/2" iron rod set with plastic cap stamped "DJS-5602", for an angle point of said "Tract 1", surveyed this date, and a reentrant corner hereof;

THENCE S 15°22'42" E, continuing with the Western boundary line of said "Tract 1", surveyed this date, a distance of 187.61 feet, to a 1/2" iron rod set with plastic cap stamped "DJS-5602", at the Northeast corner of a 50.00 foot wide private roadway easement, and the Southern most Southeast corner hereof;

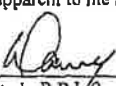
THENCE S 72°07'10" W, with the North Right of Way line of said 50.00 foot wide private roadway easement, a distance of 1,571.33 feet, to a 1/2" iron rod set with plastic cap stamped "DJS-5602", at the intersection of the East Right of Way of County Road No. 208 and the North Right of Way line of said 50.00 foot wide private roadway easement, for the Southwest corner hereof;

THENCE N 19°07'11" W, with the East Right of Way of County Road No. 208, a distance of 472.70 feet, to the POINT OF BEGINNING hereof, and calculated to contain 32.000 acres.

The Basis of Bearing for this Survey is the State Plane Coordinate System, Texas Central Grid.

CERTIFICATE

I, Danny J. Stark, hereby certify that the foregoing Field Notes and accompanying Survey Plat were prepared from an actual survey made upon the ground, the Records of said county, and surveys of area properties, that the corners and boundaries with marks natural and artificial are as found or set on the ground, that discrepancies, conflicts, protrusions or encroachments, overlapping of improvements, easements, visible or apparent to me are shown or noted hereon.


Danny J. Stark, R.P.L/S.
State of Texas No. 5602
Job No. WILCO-0410-06A



ABSTRACT SURVEYING
650 Lyda Ranch Road, Bertram, TX 78605
Ph 512-756-4500/Fx 512-756-0730

RECORDERS MEMORANDUM
All or parts of the text on this page was not clearly legible for satisfactory recordation.

EXHIBIT 5

Description of East McCormick Ranch Road

October 8, 2004
Revised April 27, 2005
STATE OF TEXAS:
COUNTY OF WILLIAMSON:

Revision A

Being a 1.802 acre tract of land out of the John Bailey Survey No. 7, Abstract No. 55, in Williamson County, Texas, and being a portion of that same tract of land, described as 125.41 acres, (herein referred to as "Parent Tract", in a Partition Deed dated November 26, 1994, from Charles A. McCormick, Madge McCormick Smith, Bryce P. McCormick, and Margaret McCormick Russell, to Charles A. McCormick, of record in Volume 2644, Page 632, Official Records of Williamson County, Texas, said 1.802 acres, being further described by metes and bounds as follows:

COMMENCING at a 1/2" iron rod found, in the East Right of Way of County Road No. 208, at the Western most Southwest corner of a tract of land, described as 135.60 acres, in a Partition Deed dated November 26, 1994, from Charles A. McCormick, Madge McCormick Smith, Bryce P. McCormick, and Margaret McCormick Russell, to Bryce P. McCormick, of record in Volume 2644, Page 632, Official Records of Williamson County, Texas, at the Northwest corner of the 125.41 acre Parent Tract, THENCE S 19°07'11" E, with the East Right of Way of County Road No. 208, and the Western boundary line of the Parent Tract, at 978.50 feet, a 1/2" iron rod set with plastic cap stamped "DJS-5602", for the Western most Northwest corner of "Tract 4", surveyed this date, in all a distance of 1,451.20 feet, to a 1/2" iron rod set with plastic cap stamped "DJS-5602", for the Northeast corner this tract and TRUE POINT OF BEGINNING hereof;

THENCE N 72°07'10" E, with the Southern boundary line of said "Tract 4", surveyed this date, a distance of 1571.33 feet, to a 1/2" iron rod set with plastic cap stamped "DJS-5602", at the Northeast corner of said "Tract 4", surveyed this date, in the Western boundary line of "Tract 1", surveyed this date, and the Northeast corner hereof;

THENCE S 15°22'42" E, with the Western boundary line of said "Tract 1", surveyed this date, a distance of 50.05 feet, to a 1/2" iron rod set with plastic cap stamped "DJS-5602", at the Southwest corner of said "Tract 1", surveyed this date, in the Northern boundary line of "Tract 2", surveyed this date, and the Southeast corner hereof;


THENCE S 72°07'10" W, at 295.33 feet, a 1/2" iron rod set with plastic cap stamped "DJS-5602", for the Northwest corner of said "Tract 2", surveyed this date, and the Northeast corner of "Tract 3", surveyed this date, in all a distance of 1,568.07 feet, to a 1/2" iron rod set with plastic cap stamped "DJS-5602", in the East Right of Way line of County Road No. 208, at the Northwest corner of said "Tract 3", surveyed this date, and the Southwest corner hereof;

THENCE N 19°07'11" W, with the East Right of Way line of County Road No. 208, a distance of 50.01 feet to the POINT OF BEGINNING, and calculated to contain 1.802 acres.

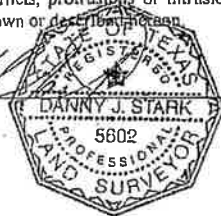
The Basis of Bearing for this Survey is the State Plane Coordinate System, Texas Central Grid.

CERTIFICATE

I, Danny J. Stark, hereby certify that the foregoing Field Notes and accompanying Survey Plat were prepared from an actual survey made upon the ground, the Records of said county, and surveys of area properties, that the corners and boundaries with marks natural and artificial are as found or set on the ground, that discrepancies, conflicts, protrusions or intrusions, overlapping of improvements, easements, visible or apparent to me are shown or described hereon.



Danny J. Stark, R.P.L.S.
State of Texas No. 5802
Job No. WILCO-0410-03A



ABSTRACT SURVEYING
650 Lyda Ranch Road, Bertram, TX 78605
Ph 512-756-4500/Fx 512-756-0730

RECORDERS MEMORANDUM
All or parts of the text on this page was not
clearly legible for satisfactory recordation.

Exhibit 6

Rights of First Refusal

Rights of first refusal ("**Rights of First Refusal**") are hereby reserved by the Grantors in this Gift Deed, which Rights of First Refusal are reserved to Grantors, their heirs and assigns, and are to be perpetual and are binding on the Children's Property, and the Grantees in this Gift Deed, and their heirs and assigns, forever; and the Grantees hereby grant to the Grantors in this Gift Deed and to their heirs and assigns Rights of First Refusal on the terms set forth herein below.

(a) **Notice.** In the event the owner ("**Offeror**") of all or a portion of the Property (a "**Disposition Lot**") conveyed by this Gift Deed to the Grantees herein receives a *bona fide* offer, which Offeror is willing to accept (an "**Acceptable Offer**") to sell or otherwise dispose of a Disposition Lot to a third party, Offeror shall give the holder of the Rights of First Refusal (the "**Offeree**") notice containing the following items (the "**Notice of Terms**"): the terms and provisions of the Acceptable Offer, including the name and address and methods of contacting the proposed buyer or other transferee (respectively the "**Transferee**"); the price and other consideration offered by the Transferee) and if the Acceptable Offer involves the acquisition by the Transferee of more than the Disposition Lot, the price is to be fairly allocated between the Disposition Lot and the additional property being acquired by the Transferee (the "**Price**"); a current Commitment for Owner's Policy of Title Insurance naming the Offeree as the proposed insured in the amount of the First Refusal Price; and a copy of any other items furnished by Offeror to the Transferee concerning the proposed sale to the Transferee. The Offeree is authorized to contact the Transferee.

(b) **Option.** The Offeree shall have an irrevocable and exclusive option to elect to have a right of first refusal (the "**Option**") to purchase (or lease, if the disposition is a lease) the Disposition Lot for 60% of the Price (the "**First Refusal Price**") (Offeree shall have the right to substitute reasonably equivalent cash consideration for any non-cash consideration that constitutes all or a portion of the Acceptable Offer) and upon the same terms and provisions as the Acceptable Offer, as modified herein. The election to exercise the Option can be made by paying Offeror \$100 (the "**First Refusal Option Money**") in cash within 30 days of receipt by the Offeree of all items comprising the Notice of Terms. Offeree is to have access to the Property from and after receipt of the Notice of Terms in order to inspect the Disposition Lot, including conducting an environmental audit. Within 5 days of the Offeree's payment of the First Refusal Option Money, Offeror is to provide the Offeree with a copy of Offeror's records relating to the condition and use of the Disposition Lot, including any environmental audits, notices and orders from governmental authorities, and permits. Offeror is to provide the Offeree with a copy of all written communications between the Transferee and the Offeror and any notices or orders from governmental authorities within 5 days of receipt. If there ever is more than one Offeree, then if more than one of the Offerees desires to purchase the Disposition Lot, they shall "draw straws" (e.g., flip a coin) to determine which of them shall be the Offeree exercising the Right of First Refusal. The remaining Offerees shall use said method to determine the order of priority among such remaining members to be substituted as the Offeree exercising the Right of First Refusal, if said Offeree or its substitute(s) either abandon closing the purchase or fail to qualify for financing within the first 60 days of the First Refusal Exercise Term (as herein after defined).

In the event that the Offeree does not pay the First Refusal Option Money to Offeror within such 30-day period, then Offeror may proceed to close the transfer of the Disposition Lot to the Transferee, provided Offeror notifies the Offeree of the closing date and provides Offeree on or before the closing date a copy of the contract with the Transferee and all closing documents being executed by the parties.

(c) **First Refusal Exercise Term.** If the Offeree pays the First Refusal Option Money to Offeror, Offeree shall have a period of 120 days after such deposit (the "**First Refusal Exercise Term**") to close the acquisition of the Disposition Lot. The sales price to the Offeree for the Disposition Lot shall be the First Refusal Price and shall at the Offeree's election either be paid all cash to Offeror at the closing or upon the financing or deferred terms, if any, of the Acceptable Offer. In order for the Offeree to exercise the rights of first refusal with respect to the Disposition Lot, the Offeree must deposit within the First Refusal Exercise Term \$1,000 as earnest money with a title company selected by the Offeree to act as the escrow agent and as the title company for closing of the sale and issuance of the title insurance to

the Offeree ("**Escrow Agent**"). In the event that the Offeree defaults in the acquisition of the Disposition Lot, after exercising its right of first refusal, Offeror's sole remedy is to be paid the earnest money.

(d) **Representations and Warranties.** Offeror represents and warrants to the Offeree that (1) as of the closing of the transfer of the Disposition Lot to the Offeree, Offeror is the owner of the Disposition Lot, subject only to the Recorded Exceptions and except for such encumbrances as may be consented to in writing by the Offeree after the date of this Gift Deed, which consent shall not be unreasonably withheld (collectively the "**Permitted Exceptions**"); (2) if the transfer is a sale, the Offeree will receive good and indefeasible fee simple title to the Disposition Lot, free and clear of all liens and encumbrances except the Permitted Exceptions.

(e) **Deed and Closing.** The Deed from the Offeror, to the Offeree shall be a general warranty deed. The Deed is to be prepared by counsel for the Offeree and delivered by the Offeree to the Escrow Agent for signature by the parties. The closing shall occur within five 5 business days of the Offeree's deposit of the Price with the Escrow Agent. Offeree and Offeror shall execute and deliver all documents necessary or customary to close the transfer to the Offeree at the closing of the Disposition Lot to the Offeree, including affidavits by Offeror as to the lien-free status of the Disposition Lot, closing statements, resolutions, governmental good standing and existence certificates, and any other certificates required by the title company.

(f) **Closing Costs.** Offeror shall pay the following closing costs: ad valorem and personal property taxes accrued through the closing of the transfer to the Offeree; the premium for the owners title insurance policy; Escrow Agent's escrow fee; title company's charges for deletion of exceptions permitted to be deleted from the title policy by the State Board of Insurance; recording fees; survey costs, if any; and Offeror's attorneys' fees.

(g) **Continuation of Rights.** The Offeree's rights of first refusal continue in effect as to the Property binding upon Offeror and Transferee, their successors and assigns, and run with the Property, including as to any subsequent sale or other disposition or transfer of the Property or portion thereof or interest therein by such Transferee, and its successors and assigns, and as to the balance of the Property not transferred to a Transferee. Also, in the event that the Offeree fails to exercise its rights of first refusal as to a particular transaction, the Offeree's rights of first refusal do not terminate or expire, but the Disposition Lot, and each part thereof, continue to be burdened by, and any Transferee of the Disposition Lot acquires the Disposition Lot burdened by the rights of first refusal and the continuing rights of first refusal granted to the Offeree to thereafter acquire the Disposition Lot under the rights of first refusal in the event of a later disposition or transfer of the Disposition Lot or portion thereof or interest therein.

(h) **Survival.** If any provision of this right of first refusal violates the rules against perpetuities or any other rule, statute of law imposing time limits, notwithstanding anything herein to the contrary, such provision shall be deemed to remain in effect only until 21 years after the death of all of the descendants of the George W. Bush, President of the United States, who are living on the date of the execution of this Deed. Any purported sale, transfer or other disposition in violation of the rights of first refusal is voidable at the election of the Offeree; or at the Offeree's election, the Offeree shall have the right and option to acquire the Disposition Lot from the Transferee in any such purported sale, transfer or other disposition in violation of the rights of first refusal at the First Refusal Price and upon the terms herein provided. Notwithstanding anything herein to the contrary, the First Refusal Price shall be 100% of the Price if required by law in order for the First Refusal to be enforceable.

The Rights of First Refusal do not apply to intestate or testate dispositions or gifts.

FILED AND RECORDED

OFFICIAL PUBLIC RECORDS 2005034735

Nancy E. Rister

05/10/2005 12:15 PM

CARRILLO \$50.00

NANCY E. RISTER, COUNTY CLERK

WILLIAMSON COUNTY, TEXAS

AFTER RECORDING RETURN TO:

William H. Locke, Jr.
Graves, Dougherty, Hearon & Moody
401 Congress Ave., Suite 2200
Austin, Texas 78701

Telephone: (512) 480-5736
Telecopier: (512) 480-5837

Exhibit 3

Exflour Map

MAP 2



30°47'28.3"N -97°54'11.52"W WGS84
WILLIAMSON COUNTY, TEXAS



WAID ENVIRONMENTAL

EXP14242\PROPAERIALMAP.DWG
1/10/2022
Responsible

Exhibit 4

ED's Map

EXFLUOR RESEARCH CORPORATION Air Quality Permit No. 165848

Map Requested by TCEQ Office of Legal Services
for Commissioners' Agenda



Protecting Texas by
Reducing and
Preventing Pollution

Texas Commission on Environmental Quality
GIS Team (Mail Code 197)
P.O. Box 13087
Austin, Texas 78711-3087
Date: 11/12/02
CRF 0079610
Cartographer: A.Banda



- Plant
- Requestors (residences)
- Requestors (property)
- Property Line
- 0.5 Mile Radius
- 1.0 Mile Radius
- 1.5 Mile Radius
- County Boundary



The plant is proposed to be located in Williamson County.
The green square on the inset map on the right represents
the location in Williamson County and the red square
where the county is in the state of Texas.

Please see Appendix A for a
list of requestors and
distances from the plant.

Source: The location of the facility was provided
by the TCEQ Office of Legal Services (OLS).
OLS obtained the site location information from the
applicant and the requestor information from the
requestor.
This map was generated by the Information Resources
Division of the Texas Commission on Environmental
Quality. This product is for informational purposes and
may not have been prepared for or be suitable for legal,
engineering, or surveying purposes. It does not repre-
sent an on-the-ground survey and represents only the
approximate relative location of property boundaries.
For more information concerning this map, contact the
Information Resource Division at (512) 239-0800.

ATTACHMENT B

TCEQ DOCKET NO. 2022-1552-AIR

APPLICATION BY EXFLOUR	§	BEFORE THE
RESEARCH CORPORATION	§	
FOR AIR QUALITY PERMIT	§	TEXAS COMMISSION ON
NO. 165848 IN WILLIAMSON	§	
COUNTY, TEXAS	§	ENVIRONMENTAL QUALITY

**DECLARATION OF MARGARET PEGGY ANNE MCCORMICK WARDLAW
IN SUPPORT OF NORTH SAN GABRIEL ALLIANCE'S REPLY TO RESPONSES TO
HEARING REQUESTS AND REQUESTS FOR RECONSIDERATION**

1. My name is Margaret Ann McCormick Wardlaw. I am over eighteen (18) years of age and of sound mind, have never been convicted of a felony, and am otherwise capable of making this declaration. The facts stated in this declaration are within my personal knowledge and are true and correct.
2. I live at 19910 Park Ranch, San Antonio, TX 78259.
3. I also own an interest property in Williamson County, Texas near the property where Exflour Research Corporation proposes to build a special chemical manufacturing facility.
4. I am currently serving as a board member of the North San Gabriel Alliance and I am also a member of the Alliance.
5. I attended the public meeting held on the Exflour application for an air permit and I provided my oral comments at that meeting. I also submitted comments and a request for a contested case hearing in October 2022.
6. I own property in close proximity to the proposed Exflour facility. This property has been properly identified in Exflour's response to hearing requests as the properties numbered 28 and 29. Attached as **Exhibit 1** to this declaration is a copy of my deed for this property. Exhibit 1 is a true and correct copy of the deed.
7. I also have an interest in property owned by the McCormick Children's Family Limited Partnership. This property has been properly identified in Exflour's response to hearing requests as the property numbered 32. Attached as **Exhibit 2** is a copy of the deed for this property. Exhibit 2 is a true and correct copy of the deed.
8. The FLP is managed by the McCormick Children's FLP GP Inc., and I am one of the managers of the corporation. Attached as **Exhibit 3** is the documentation from the Secretary of State showing that the FLP Is managed by the corporation. **Exhibit 4** is

the certificate of formation from the corporation, showing that I am one of the managers of the corporation. Exhibits 3 and 4 are true and correct copies of these documents.

9. I am the same Margaret Peggy Ann McCormick Wardlaw who is identified in the Alliance's request for a contested case hearing on the air permit application by Exflour Research Corporation.
10. I authorized the attorney for the Alliance to identify me as a member in the requests for a contested hearing submitted on behalf of the Alliance.

My Name is Margaret Peggy Anne McCormick Wardlaw, my date of birth is December 27th, 1950, and my address is 19910 Park Ranch, San Antonio, TX 78259, United States of America.

I declare under penalty of perjury that the foregoing is true and correct.

Executed in Bexar County, State of Texas, on the 5th day of December, 2022.

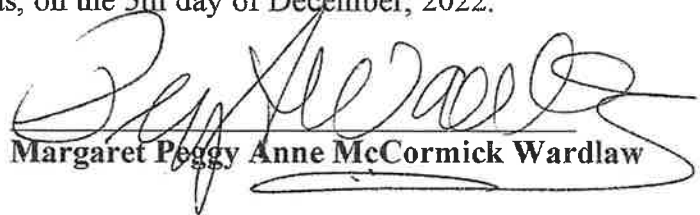

Margaret Peggy Anne McCormick Wardlaw

Exhibit 1

Wardlaw Deed



NOTICE OF CONFIDENTIALITY RIGHTS: IF YOU ARE A NATURAL PERSON, YOU MAY REMOVE OR STRIKE ANY OF THE FOLLOWING INFORMATION FROM THIS INSTRUMENT BEFORE IT IS FILED FOR RECORD IN THE PUBLIC RECORDS: YOUR SOCIAL SECURITY NUMBER OR YOUR DRIVER'S LICENSE NUMBER.

GIFT DEED TO THE CHILDREN

(McCormick Ranch West of County Road 208)

STATE OF TEXAS

§
§
§

KNOW ALL PERSONS BY THESE PRESENTS:

COUNTY OF WILLIAMSON

A. Conveyance. THAT **Charles A. McCormick** and **Joyce O'Neal McCormick** (who together with their heirs and assigns are hereinafter called "**Grantors**"), in consideration of the love and affection I have for my children, four of whom are the respective Grantees herein, and other good and valuable consideration including each of the respective Grantee's agreement to abide by the covenants, conditions and restrictions contained in the Declaration of Covenants, Conditions and Restrictions for McCormick Ranch (the "**Declaration**") executed by Grantors, which Declaration is found of record in the Official Records of Williamson County, Texas, and in consideration of the matters contained herein, have GIVEN AND GRANTED, and by these presents do hereby GIVE AND GRANT unto (1) each of my following four children, as their respective sole and separate property and estate (each of whom together with such child's heirs and assigns are respectively referred to herein as the "**Grantee**" as to the respective Lot conveyed to such child, and collectively as the "**Grantees**") the surface estate in and to the following real property, together with all rights and appurtenances thereunto belonging (collectively, the "**Children's Lots**" and the respective surface estate lot comprising the Children's Property as described on **Exhibits 1-4** below including all rights and appurtenances thereto belonging called a "**Lot**" and each Lot identified by numbers Lots 5 through 8 as identified in such exhibits):

Lot No.	Exhibit Description	Grantee
5	<u>Exhibit 1</u>	Haziel Roberta McCormick Williams (who together with her heirs and assigns is called the " Lot 5 Owner ")
6	<u>Exhibit 2</u>	Charles O'Neal McCormick (who together with her heirs and assigns is called the " Lot 5 Owner ")
7	<u>Exhibit 3</u>	Margaret (Peggy) Anne McCormick Wardlaw (who together with his heirs and assigns is called the " Lot 7 Owner ")
8	<u>Exhibit 4</u>	Ruth Jane McCormick Merton (who together with her heirs and assigns is called the " Lot 8 Owner ")

and (2) to the Grantees, as tenants in common in fee simple, as their respective sole and separate property and estate, the surface estate in and to the strip of land described in **Exhibit 5** connecting the Lots to County Road 208 (referred to herein as the "**West McCormick Ranch Road**") [collectively, the "**Children's Property**" or the "**Property**"].

TO HAVE AND TO HOLD the Property to the Grantees, each as the Grantee's sole and separate property and estate, and unto such Grantee's heirs and assigns, forever, subject to the Qualifications referenced herein.

B. Qualifications. This conveyance is made and accepted, subject to the following qualifications ("**Qualifications**"):

1. **Recorded Exceptions.** Any and all covenants, conditions, easements, agreements, reservations, rights of way, restrictions and other instruments relating to the Property, including interests in the mineral estate and rights derivative thereof, to the extent they are still in effect and are of record (collectively, the "**Recorded Exceptions**") including but not limited to the Declaration and the Articles of Incorporation, Bylaws and all Rules and Regulations now or hereafter adopted by the McCormick Ranch Property Owners' Association, Inc. (the "**Association**") pursuant thereto (collectively, the "**Regulations**"). Each Grantee agrees to assume and perform all obligations of Grantors under the Recorded Exceptions and the Regulations applicable to the respective Property conveyed to such Grantee.

2. **Survey Matters.** Visible and apparent easements, if any; any encroachments, protrusions, or overlapping of improvements; and any discrepancies, conflicts, shortages in area or boundary lines.

3. **Possessory Interests.** Rights of parties in possession and the existing rights of adjoining owners in any fences situated on a common boundary, whether of record or not.

4. **Laws and Regulations.** Such zoning or other restrictions upon the use of the Property as may be imposed by governmental authorities having jurisdiction thereof.

5. **Taxes.** The liens for all governmental assessments and ad valorem taxes for the year 2005 and all subsequent years; the payment of which are hereby assumed by the Grantee of each Property as to such Property, and subsequent assessments for that and prior years due to change in land usage, ownership, or both, the payment of which the respective Grantee assumes as to the Property conveyed to such Grantee.

6. **As Is.** Grantors convey the Property and each Grantee accepts the Property so conveyed to such Grantee "AS IS". GRANTORS MAKE NO WARRANTY OR REPRESENTATION, EXPRESS OR IMPLIED, OR ARISING BY OPERATION OF LAW, INCLUDING ANY WARRANTY OF MERCHANTABILITY OR FITNESS FOR ANY PARTICULAR PURPOSE, OF THE PROPERTY, OR ANY PART THEREOF.

7. **Reservation of Minerals.** Grantors reserve unto themselves, their heirs and assigns, all of the oil, gas and other mineral substances, and/or deposits of any kind or character, whether similar or dissimilar, whether solid, liquid or gaseous, in or under or that may be mined, produced, removed, saved, or recovered from the Land (hereinafter being collectively referred to as the "**Minerals**"). The Minerals include without limitation by enumeration, all hydrocarbons, coal, lignite, sulphur, phosphate, iron ore, sodium, salt, uranium, thorium, molybdenum, vanadium, titanium, and other fissionable materials, gold, silver, magnesium, iron, bauxite, geothermal energy (including hydrostatic pressure and thermal energy), hard rock minerals and base precious metals; and the term "gas" shall include helium, carbon dioxide, gaseous sulfur compounds, coal bed methane, and any other commercial gaseous substances, as well as natural gas and other "normal" hydrocarbon gases. Grantors release and relinquishes (such release and relinquishment being herein called the "**Surface Waiver**") unto the respective Grantee as a part of this conveyance to such Grantee of the Lot conveyed to such Grantee, all of Grantors' right to use the surface of the Lot and any portion of the Lot within the zone which is two hundred fifty feet (250') of the

surface of the Lot or such to greater depth as is necessary to avoid surface subsidence (the "**Surface**") for exploring, drilling for, mining and producing the Minerals, including releasing and relinquishing the right of ingress and egress in, over, under and across the Surface of the Lot for such purposes and releasing and relinquishing such Surface from operations in connection with mining, quarrying, exploring, drilling, testing, treating, processing, refining, producing, storing, transporting, completing, operation and/or developing of any of the Minerals or the erection of surface structures incident to such activities.

8. **Reservation of McCormick Ranch Road Expansions.** Grantors reserve unto themselves, and their heirs and assigns, an uninterrupted roadway right-of-way easement for access, ingress and egress in, over, along, under, above, and across strips of land 15' in width (the "**McCormick Ranch Road Expansions**") on each side of each of West McCormick Ranch Road, which reserved easement is conveyed by Grantors to the Association by Assignment recorded in the Official Records of Williamson County, Texas. The McCormick Ranch Road Expansions include both surface level, below surface level and above surface level easement rights for all purposes in connection with access to the McCormick Ranch, including surface level roadways and above and below surface level drainage and utilities. These reserved easement rights are to be assigned by Grantors to the Association, its successors and assigns. Upon request of the Association the owner of the area encumbered by this roadway right-of-way easement covenants to convey the fee title of the area to the Association by general warranty deed. This covenant is a covenant running with the land and is binding on each Grantee's heirs and assigns.

9. **Rights of First Refusal.** Grantors reserve unto themselves, their heirs and assigns, and there is hereby granted to Grantors, their heirs and assigns, by each of the Grantees herein and binding on them and their heirs and assigns, as owners of the Children's Property conveyed to them by this Gift Deed, rights of first refusal, as set out in **Exhibit 6** hereto, which Exhibit is incorporated herein by this reference for all purposes.

10. **Waiver by Grantees of Inequalities between the Lots.** It is agreed by the parties hereto that any liens that would arise in favor of any party by operation of law, by reason of the partition of the Children's Property into separate Lots, including but not limited to the failure of the acreage included within any of the separate Lots to equal the prorata share otherwise allocable to such party or the failure to allocate such Lots to the parties in accordance with the respective market value of such segregated Lots, shall not exist in favor of any party against any other party; and any and all implied liens so arising are expressly waived and released by the parties hereto.

11. **Reservation of Life Estate.** Grantors reserve the following rights in and to the Property for on during their lifetime: grazing of cattle, horses and other farm and ranch animals by themselves or by those authorized by them.

DATED as of the 29th day of April, 2005.

GRANTORS:

Charles A. McCormick
Charles A. McCormick

Joyce O'Neal McCormick
Joyce O'Neal McCormick

STATE OF TEXAS

§
§
§

COUNTY OF TRAVIS

This instrument was acknowledged before me on the 29th day of April, 2005, by Charles A. McCormick.



Kellie Munson
NOTARY PUBLIC, State of Texas

STATE OF TEXAS

§
§
§

COUNTY OF TRAVIS

This instrument was acknowledged before me on the 29th day of April, 2005, by Joyce O'Neal McCormick.



Kellie Munson
NOTARY PUBLIC, State of Texas

RECORDERS MEMORANDUM
All or parts of the text on this page was not
clearly legible for satisfactory recordation.

EXHIBIT 1

Description of Lot 5

Hazel Roberta McCormick Williams

October 8, 2004
STATE OF TEXAS:
COUNTY OF WILLIAMSON:

Field Notes to accompany a Survey Plat of a 13.846 acre tract of land out of the John Bailey Survey No. 7, Abstract No. 55, in Williamson County, Texas.
Prepared for Charles A. McCormick, without benefit of Title Commitment.

Being a 13.846 acre tract of land out of the John Bailey Survey No. 7, Abstract No. 55, in Williamson County, Texas, and being a portion of that same tract of land, described as 131.32 acres, (herein referred to as "Parent Tract"), in a Contract of Sale & Purchase, dated January 31, 1950, from the Veterans' Land Board of the State of Texas to Charles A. McCormick, of record in Volume 359, Page 455, Deed Records of Williamson County, Texas, said 13.846 acres (henceforth to be known as "Tract 5"), being further described herein by metes and bounds as follows:

BEGINNING at a 1/2" iron rod found in the West Right of Way line of County Road No. 208, at the Northeast corner of a tract of land, described as 11.75 acres, in a Warranty Deed with Vendor's Lien dated June 1, 2001, from Russell Wayne Billieu, et al, to George V. Guerry and wife, Angela N. Guerry, of record in Doc No. 2001039462, Official Records of Williamson County, Texas, at the Southeast corner of the Parent Tract, and the Southeast corner hereof;

THENCE S 61°33'47" W, with the Northern boundary line of said 11.75 acre Guerry tract, a distance of 544.57 feet, to a 1/2" iron rod set with plastic cap stamped "DJS-5602", for Southeast corner of "Tract 6", surveyed this date, and the Southwest corner hereof;

THENCE N 18°53'22" W, with the Eastern boundary line of said "Tract 6", surveyed this date, a distance of 1,071.37 feet to a 1/2" iron rod set with plastic cap stamped "DJS-5602", in the South Right of Way line of a 50.00 foot wide private roadway easement, for the Northeast corner of said "Tract 6", surveyed this date, and the Northwest corner hereof;

THENCE N 62°53'29" E, with the South Right of Way line of a 50.00 foot wide private roadway easement, a distance of 471.66 feet to a 1/2" iron rod set with plastic cap stamped "DJS-5602", for the Northern most Northeast corner hereof;

THENCE S 18°32'43" E, leaving the South Right of Way line of said 50.00 foot wide private roadway easement, a distance of 130.20 feet to a 1/2" iron rod set with plastic cap stamped "DJS-5602", for a reentrant corner hereof;

THENCE N 71°06'01" E, a distance of 121.60 feet, to a 1/2" iron rod set with plastic cap stamped "DJS-5602", in the West Right of Way line of County Road No. 208, for the Eastern most Northeast corner hereof;

THENCE with the West Right of Way line of County Road No. 208, the following four (4) courses and distances:

1. S 18°53'22" E, a distance of 603.91 feet to a 1/2" iron rod found, for angle point hereof;
2. S 13°41'05" E, a distance of 88.29 feet to a 1/2" iron rod found, for angle point hereof;
3. S 13°49'28" E, a distance of 113.75 feet to a 1/2" iron rod found, for angle point hereof; and
4. S 2°50'36" E, a distance of 117.73 feet, to the POINT OF BEGINNING hereof, and calculated to contain 13.846 acres.

The Basis of Bearing for this Survey is the State Plane Coordinate System, Texas Central Grid.

CERTIFICATE

I, Danny J. Stark, hereby certify that the foregoing Field Notes and accompanying Survey Plat were prepared from an actual survey made upon the ground, the Records of said county, and surveys of area properties, that the corners and boundaries with marks natural and artificial are as found or set on the ground, that discrepancies, conflicts, protrusions or intrusions, overlapping of improvements, easements, visible or apparent to me are shown and described hereon.

Danny J. Stark, R.P.L.S.
State of Texas No. 5602
Job No. WILCO-0410-07



ABSTRACT SURVEYING
650 Lyda Ranch Road, Bertram, TX 78605
Ph 512-756-4500/Fx 512-756-0730

RECORDERS MEMORANDUM
All or parts of the text on this page was not
clearly legible for satisfactory recordation.

EXHIBIT 2

Description of Lot 6

Charles O'Neal McCormick

October 8, 2004
STATE OF TEXAS:
COUNTY OF WILLIAMSON:

Field Notes to accompany a Survey Plat of a 13.846 acre tract of land out of the John Bailey Survey No. 7, Abstract No. 55, in Williamson County, Texas.
Prepared for Charles A. McCormick, without benefit of Title Commitment.

Being a 13.846 acre tract of land out of the John Bailey Survey No. 7, Abstract No. 55, in Williamson County, Texas, and being a portion of that same tract of land, described as 131.32 acres, (herein referred to as "Parent Tract"), in a Contract of Sale & Purchase, dated January 31, 1950, from the Veterans' Land Board of the State of Texas to Charles A. McCormick, of record in Volume 359, Page 455, Deed Records of Williamson County, Texas, said 13.846 acres (henceforth to be known as "Tract 6"), being further described herein by metes and bounds as follows:

COMMENCING at a 1/2" iron rod found in the West Right of Way line of County Road No. 208, at the Northeast corner of a tract of land, described as 11.75 acres, in a Warranty Deed with Vendor's Lien dated June 1, 2001, from Russell Wayne Billieu, et al, to George V. Guerry and wife, Angela N. Guerry, of record in Doc No. 2001039462, Official Records of Williamson County, Texas, at the Southeast corner of the Parent Tract, and the Southeast corner of "Tract 5", surveyed this date, THENCE S 61°33'47" W, with the Northern boundary line of said 11.75 acre Guerry tract, a distance of 544.57 feet, to a 1/2" iron rod set with plastic cap stamped "DJS-5602", for the Southwest corner of said "Tract 5", surveyed this date, and the Southeast corner this tract, and the TRUE POINT OF BEGINNING hereof;

THENCE S 61°33'47" W, with the Northern boundary line of said 11.75 acre Guerry tract, a distance of 574.49 feet, to a 1/2" iron rod set with plastic cap stamped "DJS-5602", for the Eastern most Southeast corner of "Tract 7", surveyed this date, and the Southwest corner hereof;

THENCE N 18°56'00" W, crossing into the Parent Tract, with the Eastern boundary line of said "Tract 7", surveyed this date, a distance of 476.83 feet, to a 1/2" iron rod set with plastic cap stamped "DJS-5602", for the Southern most Southeast corner of a 50.00 foot wide private roadway easement, for an angle point hereof;

THENCE N 16°26'14" W, with the East Right of Way line of said a 50.00 foot wide roadway easement, a distance of 612.29 feet, to a 1/2" iron rod set with plastic cap stamped "DJS-5602", at a reentrant corner of said a 50.00 foot wide private roadway easement, and the Northwest corner hereof;


THENCE N 62°53'29" E, with the South Right of Way line of said a 50.00 foot wide private roadway easement, a distance of 546.31 feet, to a 1/2" iron rod set with plastic cap stamped "DJS-5602", for the Northwest corner of said "Tract 5", surveyed this date, and the Northeast corner hereof;

THENCE S 18°53'22" E, with the Western boundary line of said "Tract 5", surveyed this date, a distance of 1,071.37, to the POINT OF BEGINNING hereof, and calculated to contain 13.846 acres.

The Basis of Bearing for this Survey is the State Plane Coordinate System, Texas Central Grid.

CERTIFICATE

I, Danny J. Stark, hereby certify that the foregoing Field Notes and accompanying Survey Plat were prepared from an actual survey made upon the ground, the Records of said county, and surveys of area properties, that the corners and boundaries with marks natural and artificial are as found or set on the ground, that discrepancies, conflicts, protrusions or intrusions, overlapping of improvements, easements, visible or apparent to me are shown or described hereon.



Danny J. Stark, R.P.L.S.
State of Texas No. 5602
Job No. WILCO-0410-08



ABSTRACT SURVEYING
650 Lyda Ranch Road, Bertram, TX 78605
Ph 512-756-4500/Fx 512-756-0730

RECORDERS MEMORANDUM
All or parts of the text on this page was not
clearly legible for satisfactory recordation.

EXHIBIT 3

Description of Lot 7

Margaret (Peggy) Anne McCormick Wardlaw

October 8, 2004
STATE OF TEXAS:
COUNTY OF WILLIAMSON:

Field Notes to accompany a Survey Plat of a 30.227 acre tract of land out of the John Bailey Survey No. 7, Abstract No. 55, in Williamson County, Texas.
Prepared for Charles A. McCormick, without benefit of Title Commitment.

Being a 30.227 acre tract of land out of the John Bailey Survey No. 7, Abstract No. 55, in Williamson County, Texas, and being a portions of those same tracts of land, (herein referred to as "Parent Tract"), described as 131.32 acres, in a Contract of Sale & Purchase, dated January 31, 1950, from the Veterans' Land Board of the State of Texas to Charles A. McCormick, of record in Volume 359, Page 455, Deed Records of Williamson County, Texas, and 38.915 acres, in a Deed dated December 22, 1970, from Maude Allen McCormick, to Charles Allen McCormick, of record in Volume 532, Page 721, Deed Records of Williamson County, Texas, said 30.227 acres (henceforth to be known as "Tract 7"), being further described herein by metes and bounds as follows:

COMMENCING at a 1/2" iron rod found in the West Right of Way line of County Road No. 208, at the Northeast corner of a tract of land, described as 11.75 acres, in a Warranty Deed with Vendor's Lien dated June 1, 2001, from Russell Wayne Billieu, et al, to George V. Guerry and wife, Angela N. Guerry, of record in Doc No. 2001039462, Official Records of Williamson County, Texas, at the Southeast corner of the 131.32 acre portion of the Parent Tract, and the Southeast corner of "Tract 5", surveyed this date, THENCE S 61°33'47" W, with the Northern boundary line of said 11.75 acre Guerry tract, at 544.57 feet, at 1/2" iron rod set with plastic cap stamped "DJS-5602", for the Southwest corner of said "Tract 5", surveyed this date, and the Southeast corner of "Tract 6", surveyed this date, in all a distance of 1,119.07 feet, to a 1/2" iron rod set with plastic cap stamped "DJS-5602", for the Southwest corner of said "Tract 6", surveyed this date, and the Eastern most Southeast corner this tract, and the TRUE POINT OF BEGINNING hereof;

THENCE S 61°31'01" W, with the Northern boundary line of said 11.75 acre Guerry tract, a distance of 510.23 feet, to a 1/2" iron rod found, at the Northwest corner of said 11.75 acre Guerry tract, and a reentrant corner hereof;

THENCE S 24°35'00" W, with the Western boundary line of said 11.75 acre Guerry tract, a distance of 290.90 feet, to a 1/2" iron rod set with plastic cap stamped "DJS-5602", at the Southwest corner of said 11.75 acre Guerry tract, in the Northern boundary line of a tract of land, described as 99.44 acres, in a Warranty Deed dated October 27, 1987, from Emile Jamail to R. Emmett Cater, Trustee, of record in Volume 1598, Page 443, Official Records of Williamson County, Texas, and the Southern most Southeast corner hereof;

THENCE S 72°10'06" W, with the Northern boundary line of said 99.44 acre R. Emmett Cater tract, a distance of 1,159.63 feet, to a fence corner post found, at the Southwest corner of the 131.32 acre portion of the Parent Tract, and the Southeast corner of the 38.915 acre portion of the Parent Tract, for an angle point hereof;

THENCE S 71°42'43" W, continuing with the Northern boundary line of said 99.44 acre R. Emmett Cater tract, a distance of 735.34 feet, to a 60d nail found, for the Southwest corner hereof;

THENCE crossing into the Parent Tract, the following three (3) courses and distances:

1. N 9°18'34" W, a distance of 221.42 feet, to a 1/2" iron rod set with plastic cap stamped "DJS-5602", for angle point hereof;
2. N 3°06'59" E, a distance of 206.31 feet, to a 1/2" iron rod set with plastic cap stamped "DJS-5602", for angle point hereof; and
3. N 32°34'14" E, a distance of 172.74 feet, to a 1/2" iron rod set with plastic cap stamped "DJS-5602", for the Southwest corner of "Tract 8", surveyed this date, and the Northwest corner hereof;

THENCE N 78°46'27" E, with the Southern boundary line of said "Tract 8", surveyed this date, a distance of 574.86 feet, to a 1/2" iron rod set with plastic cap stamped "DJS-5602", in the Eastern boundary line of the 38.915 acre portion of the Parent Tract, and the Western boundary line of the 131.32 acre portion of the Parent Tract, for angle point hereof;

THENCE N 61°18'30" E, continuing with the Southern boundary line of said "Tract 8", surveyed this date, a distance of 1,753.45 feet, to a 1/2" iron rod set with plastic cap stamped "DJS-5602", at the Southwest corner of a 50.00 foot wide roadway easement, for an angle point hereof;

THENCE N 65°46'02" E, with the Southern end of said 50.00 foot wide roadway easement, a distance of 50.97 feet, to a 1/2" iron rod set with plastic cap stamped "DJS-5602", in the Western boundary line of "Tract 6", surveyed this date, at the Southern most Southeast corner of said 50.00 foot wide roadway easement, and the Northeast corner hereof;

THENCE S 18°56'00" E, with the Western boundary line of said "Tract 6", surveyed this date, a distance of 476.83 feet, to the POINT OF BEGINNING hereof, and calculated to contain 30.227 acres.

The Basis of Bearing for this Survey is the State Plane Coordinate System, Texas Central Grid.

CERTIFICATE

I, Danny J. Stark, hereby certify that the foregoing Field Notes and accompanying Survey Plat were prepared from an actual survey made upon the ground, the Records of said county, and surveys of area properties, that the corners and boundaries with marks natural and artificial are as found or set on the ground, that discrepancies, conflicts, protrusions or intrusions, overlapping of improvements, easements, visible or apparent to me are shown as noted herein.

Danny J. Stark, R.P.L.S.
State of Texas No. 5602
Job No. WILCO-0410-09



ABSTRACT SURVEYING
650 Lyda Ranch Road, Bertram, TX 78605
Ph 512-756-4500/Fx 512-756-0730

RECORDERS MEMORANDUM
All or parts of the text on this page was not
clearly legible for satisfactory recordation.

EXHIBIT 4

Description of Lot 8

Ruth Jane McCormick Merton

October 8, 2004
Rev. November 16, 2004
STATE OF TEXAS:
COUNTY OF WILLIAMSON:

Rev. A

Field Notes to accompany a Survey Plat of a 31.108 acre tract of land out of the John Bailey Survey No. 7, Abstract No. 55, in Williamson County, Texas.
Prepared for Charles A. McCormick, without benefit of Title Commitment.

Being a 31.108 acre tract of land out of the John Bailey Survey No. 7, Abstract No. 55, in Williamson County, Texas, and being a portions of those same tracts of land, (herein referred to as "Parent Tract"), described as 131.32 acres, in a Contract of Sale & Purchase, dated January 31, 1950, from the Veterans' Land Board of the State of Texas to Charles A. McCormick, of record in Volume 339, Page 455, Deed Records of Williamson County, Texas, and 38.915 acres, in a Deed dated December 22, 1970, from Maude Allen McCormick, to Charles Allen McCormick, of record in Volume 532, Page 721, Deed Records of Williamson County, Texas, said 31.108 acres (henceforth to be known as "Tract 8"), being further described herein by metes and bounds as follows:

COMMENCING at a 1/2" iron rod found in the West Right of Way line of County Road No. 208, at the Northeast corner of a tract of land, described as 11.75 acres, in a Warranty Deed with Vendor's Lien dated June 1, 2001, from Russell Wayne Billieu, et al, to George V. Guerry and wife, Angela N. Guerry, of record in Doc No. 2001039462, Official Records of Williamson County, Texas, at the Southeast corner of the 131.32 acre portion of the Parent Tract, and the Southeast corner "Tract 5", surveyed this date, THENCE S 61°33'47" W, with the Northern boundary line of said 11.75 acre Guerry tract, at 544.57 feet, at 1/2" iron rod set with plastic cap stamped "DJS-5602", for the Southwest corner of said "Tract 5", surveyed this date, and the Southeast corner of "Tract 6", surveyed this date, in all a distance of 1,119.07 feet, to a 1/2" iron rod set with plastic cap stamped "DJS-5602", at the Southwest corner of said "Tract 6", surveyed this date, and the Eastern most Southeast corner of "Tract 7", surveyed this date, and N 18°56'00" W, with the common boundary line of said "Tract 6" and said "Tract 7", both surveyed this date, a distance of 476.83, to a 1/2" iron rod set with plastic cap stamped "DJS-5602", at the Northeast corner of said "Tract 7", surveyed this date, at the Southern most Southeast corner of said 50.00 foot wide private roadway easement, and S 65°46'02" W, with the Southern end of said 50.00 foot wide private roadway easement, and the Northern boundary line of said "Tract 7", surveyed this date, a distance of 50.97 feet, to a 1/2" iron rod set with plastic cap stamped "DJS-5602", at the Southwest corner of said 50.00 foot wide private roadway easement, the Southeast corner of this tract, and the TRUE POINT OF BEGINNING hereof;

THENCE S 61°18'30" W, continuing with the Northern boundary line of said "Tract 7", surveyed this date, a distance of 1,753.45 feet, to a 1/2" iron rod set with plastic cap stamped "DJS-5602", in the Western boundary line of the 131.32 acre portion of the Parent Tract, and the Eastern boundary line of the 38.915 acre portion of the Parent Tract, for an angle point hereof;

THENCE S 78°46'27" W, continuing with the Northern boundary line of said "Tract 7", surveyed this date, a distance of 574.86 feet, to a 1/2" iron rod set with plastic cap stamped "DJS-5602", for the Southwest corner hereof;

THENCE N 32°34'14" E, a distance of 172.74 feet, to a 1/2" iron rod set with plastic cap stamped "DJS-5602", for angle point hereof;

THENCE N 21°27'35" E, a distance of 716.29 feet, to a 1/2" iron rod set with plastic cap stamped "DJS-5602", for the Northwest corner hereof;

THENCE N 5°28'45" E, a distance of 112.14 feet, to a 1/2" iron rod set with plastic cap stamped "DJS-5602", for an angle point hereof;

THENCE N 89°50'43" E, a distance of 195.25 feet, to a 1/2" iron rod set with plastic cap stamped "DJS-5602", for an angle point hereof;

THENCE N 74°18'59" E, a distance of 142.79 feet, to a 1/2" iron rod set with plastic cap stamped "DJS-5602", in the Eastern boundary line of the 38.915 acre portion of the Parent Tract and the Western boundary line of the 131.32 acre portion of the Parent Tract, for an angle point hereof;

THENCE N 64°51'29" E, a distance of 1,359.54 feet, to a 1/2" iron rod set with plastic cap stamped "DJS-5602", in the West Right of Way line of said 50.00 foot wide roadway easement, for the Northeast corner hereof;

THENCE S 16°26'14" E, with the West Right of Way line of said 50.00 foot wide roadway easement, a distance of 610.74 feet, to the POINT OF BEGINNING hereof, and calculated to contain 31.108 acres.

The Basis of Bearing for this Survey is the State Plane Coordinate System, Texas Central Grid.

CERTIFICATE

I, Danny J. Stark, hereby certify that the foregoing Field Notes and accompanying Survey Plat were prepared from an actual survey made upon the ground, the Records of said county, and surveys of area properties, that the corners and boundaries with marks natural and artificial are as found or set on the ground, that discrepancies, conflicts, protrusions or intrusions, overlapping of improvements, easements, visible or apparent to me are shown or described hereon.

Danny J. Stark, R.P.L.S.
State of Texas No. 5602
Job No. WILCO-0410-108



ABSTRACT SURVEYING
650 Lyda Ranch Road, Bertram, TX 78605
Ph 512-756-4500/Fx 512-756-0730

EXHIBIT 5

Description of West McCormick Ranch Road

October 8, 2004
Rev. November 16, 2004

Rev. A

STATE OF TEXAS:
COUNTY OF WILLIAMSON:

Being a 2.075 acre tract of land out of the John Bailey Survey No. 7, Abstract No. 55, in Williamson County, Texas, and being a portion of that same tract of land, described as 131.32 acres, (herein referred to as "Parent Tract"), in a Contract of Sale & Purchase, dated January 31, 1950, from the Veterans' Land Board of the State of Texas to Charles A. McCormick, of record in Volume 359, Page 455, Deed Records of Williamson County, Texas, said 2.075 acres, being further described by metes and bounds as follows:

COMMENCING at a 1/2" iron rod found, in the West Right of Way of County Road No. 208, at the Northeast corner of the 131.32 acre Parent Tract, THENCE S 18°55'47" E, with the West Right of Way of County Road No. 208, and the Eastern boundary line of the Parent Tract, a distance of 396.07 feet, to a 1/2" iron rod set with plastic cap stamped "DJS-5602", for the Northeast corner this tract and TRUE POINT OF BEGINNING hereof;

THENCE S 18°55'47" E, continuing with the West Right of Way of County Road No. 208, a distance of 50.57 feet, to a 1/2" iron rod set with plastic cap stamped "DJS-5602", for the Eastern most Southeast corner of this tract;

THENCE S 71°30'47" W, crossing into the Parent Tract, a distance of 121.29 feet, to a 1/2" iron rod set with plastic cap stamped "DJS-5602", for the Northern most Northeast corner of "Tract 5", surveyed this date, for angle point hereof;

THENCE S 62°53'29" W, at 471.66 feet, a 1/2" iron rod set with plastic cap stamped "DJS-5602", for the Northwest corner of said "Tract 5", surveyed this date, and the Northeast corner of "Tract 6", surveyed this date, in all a distance of 1,017.97 feet, to a 1/2" iron rod set with plastic cap stamped "DJS-5602", for the Northwest corner of said "Tract 6", surveyed this date, and a reentrant corner hereof;

THENCE S 16°26'14" E, with the Western boundary line of said "Tract 6", surveyed this date, a distance of 612.29 feet, to a 1/2" iron rod set with plastic cap stamped "DJS-5602", for the Northeast corner of "Tract 7", surveyed this date, and the Southern most Southeast corner hereof;

THENCE S 65°46'02" W, with the Northern boundary line of said "Tract 7", surveyed this date, a distance of 50.97 feet, to a 1/2" iron rod set with plastic cap stamped "DJS-5602", for the Southeast corner of "Tract 8", surveyed this date, and the Southwest corner hereof;

THENCE N 16°26'14" W, at 610.74 feet, a 1/2" iron rod set with plastic cap stamped "DJS-5602", for the Northeast corner of said "Tract 8", surveyed this date, in all a distance of 660.57 feet, to a 1/2" iron rod set with plastic cap stamped "DJS-5602", for the Northwest corner hereof;

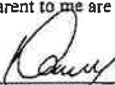
THENCE N 62°53'29" E, a distance of 1067.46 feet, to a 1/2" iron rod set with plastic cap stamped "DJS-5602", for angle point hereof;

THENCE S 71°30'47" E, a distance of 120.95 feet, to the POINT OF BEGINNING, and calculated to contain 2.075 acres.

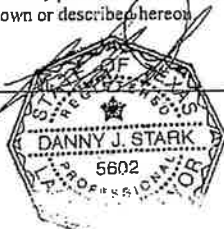
The Basis of Bearing for this Survey is the State Plane Coordinate System, Texas Central Grid.

CERTIFICATE

I, Danny J. Stark, hereby certify that the foregoing Field Notes and accompanying Survey Plat were prepared from an actual survey made upon the ground, the Records of said county, and surveys of area properties, that the corners and boundaries with marks natural and artificial are as found or set on the ground, that discrepancies, conflicts, protrusions or intrusions, overlapping of improvements, easements, visible or apparent to me are shown or described hereon.



Danny J. Stark, R.P.L.S.
State of Texas No. 5602
Job No. WILCO-0410-10a



ABSTRACT SURVEYING
650 Lyda Ranch Road, Bertram, TX 78605
Ph 512-756-4500/Fx 512-756-0730

Exhibit 6

Rights of First Refusal

Rights of first refusal ("**Rights of First Refusal**") are hereby reserved by the Grantors in this Gift Deed, which Rights of First Refusal are reserved to Grantors, their heirs and assigns, and are to be perpetual and are binding on the Children's Property, and the Grantees in this Gift Deed, and their heirs and assigns, forever; and the Grantees hereby grant to the Grantors in this Gift Deed and to their heirs and assigns Rights of First Refusal on the terms set forth herein below.

(a) **Notice.** In the event the owner ("**Offeror**") of all or a portion of the Property (a "**Disposition Lot**") conveyed by this Gift Deed to the Grantees herein receives a *bona fide* offer, which Offeror is willing to accept (an "**Acceptable Offer**") to sell or otherwise dispose of a Disposition Lot to a third party, Offeror shall give the holder of the Rights of First Refusal (the "**Offeree**") notice containing the following items (the "**Notice of Terms**"): the terms and provisions of the Acceptable Offer, including the name and address and methods of contacting the proposed buyer or other transferee (respectively the "**Transferee**"); the price and other consideration offered by the Transferee and if the Acceptable Offer involves the acquisition by the Transferee of more than the Disposition Lot, the price is to be fairly allocated between the Disposition Lot and the additional property being acquired by the Transferee (the "**Price**"); a current Commitment for Owner's Policy of Title Insurance naming the Offeree as the proposed insured in the amount of the First Refusal Price; and a copy of any other items furnished by Offeror to the Transferee concerning the proposed sale to the Transferee. The Offeree is authorized to contact the Transferee.

(b) **Option.** The Offeree shall have an irrevocable and exclusive option to elect to have a right of first refusal (the "**Option**") to purchase (or lease, if the disposition is a lease) the Disposition Lot for 60% of the Price (the "**First Refusal Price**") (Offeree shall have the right to substitute reasonably equivalent cash consideration for any non-cash consideration that constitutes all or a portion of the Acceptable Offer) and upon the same terms and provisions as the Acceptable Offer, as modified herein. The election to exercise the Option can be made by paying Offeror \$100 (the "**First Refusal Option Money**") in cash within 30 days of receipt by the Offeree of all items comprising the Notice of Terms. Offeree is to have access to the Property from and after receipt of the Notice of Terms in order to inspect the Disposition Lot, including conducting an environmental audit. Within 5 days of the Offeree's payment of the First Refusal Option Money, Offeror is to provide the Offeree with a copy of Offeror's records relating to the condition and use of the Disposition Lot, including any environmental audits, notices and orders from governmental authorities, and permits. Offeror is to provide the Offeree with a copy of all written communications between the Transferee and the Offeror and any notices or orders from governmental authorities within 5 days of receipt. If there ever is more than one Offeree, then if more than one of the Offerees desires to purchase the Disposition Lot, they shall "draw straws" (e.g., flip a coin) to determine which of them shall be the Offeree exercising the Right of First Refusal. The remaining Offerees shall use said method to determine the order of priority among such remaining members to be substituted as the Offeree exercising the Right of First Refusal, if said Offeree or its substitute(s) either abandon closing the purchase or fail to qualify for financing within the first 60 days of the First Refusal Exercise Term (as herein after defined).

In the event that the Offeree does not pay the First Refusal Option Money to Offeror within such 30-day period, then Offeror may proceed to close the transfer of the Disposition Lot to the Transferee, provided Offeror notifies the Offeree of the closing date and provides Offeree on or before the closing date a copy of the contract with the Transferee and all closing documents being executed by the parties.

(c) **First Refusal Exercise Term.** If the Offeree pays the First Refusal Option Money to Offeror, Offeree shall have a period of 120 days after such deposit (the "**First Refusal Exercise Term**") to close the acquisition of the Disposition Lot. The sales price to the Offeree for the Disposition Lot shall be the First Refusal Price and shall at the Offeree's election either be paid all cash to Offeror at the closing or upon the financing or deferred terms, if any, of the Acceptable Offer. In order for the Offeree to exercise the rights of first refusal with respect to the Disposition Lot, the Offeree must deposit within the

First Refusal Exercise Term \$1,000 as earnest money with a title company selected by the Offeree to act as the escrow agent and as the title company for closing of the sale and issuance of the title insurance to the Offeree ("**Escrow Agent**"). In the event that the Offeree defaults in the acquisition of the Disposition Lot, after exercising its right of first refusal, Offeror's sole remedy is to be paid the earnest money.

(d) **Representations and Warranties.** Offeror represents and warrants to the Offeree that (1) as of the closing of the transfer of the Disposition Lot to the Offeree, Offeror is the owner of the Disposition Lot, subject only to the Recorded Exceptions and except for such encumbrances as may be consented to in writing by the Offeree after the date of this Gift Deed, which consent shall not be unreasonably withheld (collectively the "**Permitted Exceptions**"); (2) if the transfer is a sale, the Offeree will receive good and indefeasible fee simple title to the Disposition Lot, free and clear of all liens and encumbrances except the Permitted Exceptions.

(e) **Deed and Closing.** The Deed from the Offeror, to the Offeree shall be a general warranty deed. The Deed is to be prepared by counsel for the Offeree and delivered by the Offeree to the Escrow Agent for signature by the parties. The closing shall occur within five 5 business days of the Offeree's deposit of the Price with the Escrow Agent. Offeree and Offeror shall execute and deliver all documents necessary or customary to close the transfer to the Offeree at the closing of the Disposition Lot to the Offeree, including affidavits by Offeror as to the lien-free status of the Disposition Lot, closing statements, resolutions, governmental good standing and existence certificates, and any other certificates required by the title company.

(f) **Closing Costs.** Offeror shall pay the following closing costs: ad valorem and personal property taxes accrued through the closing of the transfer to the Offeree; the premium for the owners title insurance policy; Escrow Agent's escrow fee; title company's charges for deletion of exceptions permitted to be deleted from the title policy by the State Board of Insurance; recording fees; survey costs, if any; and Offeror's attorneys' fees.

(g) **Continuation of Rights.** The Offeree's rights of first refusal continue in effect as to the Property binding upon Offeror and Transferee, their successors and assigns, and run with the Property, including as to any subsequent sale or other disposition or transfer of the Property or portion thereof or interest therein by such Transferee, and its successors and assigns, and as to the balance of the Property not transferred to a Transferee. Also, in the event that the Offeree fails to exercise its rights of first refusal as to a particular transaction, the Offeree's rights of first refusal do not terminate or expire, but the Disposition Lot, and each part thereof, continue to be burdened by, and any Transferee of the Disposition Lot acquires the Disposition Lot burdened by the rights of first refusal and the continuing rights of first refusal granted to the Offeree to thereafter acquire the Disposition Lot under the rights of first refusal in the event of a later disposition or transfer of the Disposition Lot or portion thereof or interest therein.

(h) **Survival.** If any provision of this right of first refusal violates the rules against perpetuities or any other rule, statute of law imposing time limits, notwithstanding anything herein to the contrary, such provision shall be deemed to remain in effect only until 21 years after the death of all of the descendants of the George W. Bush, President of the United States, who are living on the date of the execution of this Deed. Any purported sale, transfer or other disposition in violation of the rights of first refusal is voidable at the election of the Offeree; or at the Offeree's election, the Offeree shall have the right and option to acquire the Disposition Lot from the Transferee in any such purported sale, transfer or other disposition in violation of the rights of first refusal at the First Refusal Price and upon the terms herein provided. Notwithstanding anything herein to the contrary, the First Refusal Price shall be 100% of the Price if required by law in order for the First Refusal to be enforceable.

The Rights of First Refusal do not apply to intestate or testate dispositions or gifts.

FILED AND RECORDED

OFFICIAL PUBLIC RECORDS 2005036490

Nancy E. Rister

05/17/2005 09:30 AM

MARY \$46.00

NANCY E. RISTER, COUNTY CLERK

WILLIAMSON COUNTY, TEXAS

AFTER RECORDING RETURN TO:

William H. Locke, Jr.

Graves, Dougherty, Hearon & Moody

401 Congress Ave., Suite 2200 PO Box 98

Austin, Texas 78701 78767-0098

Telephone: (512) 480-5736

Telecopier: (512) 480-5837

Exhibit 2
Deed for the Property



DEED TO THE McCORMICK CHILDREN'S FAMILY LIMITED PARTNERSHIP

STATE OF TEXAS §
 §
COUNTY OF WILLIAMSON §

KNOW ALL PERSONS BY THESE PRESENTS:

A. Conveyance. THAT **Charles A. McCormick** and **Joyce O'Neal McCormick** (who together with their heirs and assigns are hereinafter called "**Grantors**" or "**Grantor**"), in consideration of the love and affection we have for one or more of our children, the limited partners of the limited partnership created by the McCormick Children's Family Limited Partnership Agreement entered into by the Grantors herein as the general partner and one or more of our children as the limited partners creating the "**McCormick Children's Family Limited Partnership**" and other consideration including in consideration of the matters contained herein, have GIVEN AND GRANTED, and by these presents do hereby GIVE AND GRANT unto the **McCormick Children's Family Limited Partnership**, a Texas limited partnership (referred to herein as the "**Grantee**") whose address is 4306 Miramar Drive, Georgetown, Texas 78628-1358, (1) the property described on **Exhibit A**, together with all rights and appurtenances thereunto belonging (collectively, the "**Partnership's Property**"), (2) the Rights of First Refusal reserved by Charles A. McCormick in the Gift Deeds to the Children dated April 29, 2005 and recorded under Clerk's Document # 2005034735 and 2005036490 in the Official Records for Williamson County, Texas, which Gift Deeds to the Children conveyed to one or more of the children of Charles A. McCormick and Joyce O'Neal McCormick a tract or tracts (the "**Children's Property**"), subject to the reservation of (a) the mineral estate thereto (the "**Mineral Estate**") and (b) a right of first refusal therein created (the "**Right of First Refusal**") in favor of Charles A. McCormick and contemplated to be assigned to the McCormick Children's Family Limited Partnership and (3) the Mineral Estate reserved by Charles A. McCormick in the Gift Deeds to the Children recorded in the Official Records for Williamson County, Texas.

TO HAVE AND TO HOLD the Partnership's Property unto Grantee and such Grantee's successors and assigns, forever, subject to the Qualifications referenced herein.

B. Qualifications. This conveyance is made and accepted, subject to the following qualifications ("**Qualifications**");

1. Recorded and Other Matters. Any and all covenants, conditions, easements, agreements, reservations, rights of way, restrictions and other instruments relating to the Partnership's Property, including interests in the mineral estate and rights derivative thereof, to the extent they are still in effect and are of record (collectively, the "**Exceptions**"). Grantee agrees to assume and perform all obligations of Grantors under the Exceptions applicable to the Partnership's Property.

2. Survey Matters. Visible and apparent easements, if any; any encroachments, protrusions, or overlapping of improvements; and any discrepancies, conflicts, shortages in area or boundary lines.

3. Possessory Interests. Rights of parties in possession and the existing rights of adjoining owners in any fences situated on a common boundary, whether of record or not.

4. Laws and Regulations. Such zoning or other restrictions upon the use of the Partnership's Property as may be imposed by governmental authorities having jurisdiction thereof.

5. Taxes. The liens for all governmental assessments and ad valorem taxes; the payment of which are hereby assumed by Grantee, and subsequent assessments for that and prior years due to change in land usage, ownership, or both, the payment of which Grantee assumes.

6. As Is. Grantors convey the Partnership's Property and Grantee accepts the Partnership's Property "AS IS". GRANTORS MAKE NO WARRANTY OR REPRESENTATION, EXPRESS OR IMPLIED, OR ARISING BY OPERATION OF LAW, INCLUDING ANY WARRANTY OF MERCHANTABILITY OR FITNESS FOR ANY PARTICULAR PURPOSE, OF THE PROPERTY, OR ANY PART THEREOF.

7. Restrictions. Attached hereto as Exhibit B are restrictive covenants, which are hereby imposed by Grantors, on the Property as covenants running with the land, binding on Grantee, its successors and assigns, and which are enforceable by the McCormick Ranch Property Owners' Association, Inc. on behalf of the owners of the Children's Property.

DATED as of the 5th day of October, 2006.

GRANTORS:

Charles A. McCormick

Charles A. McCormick

Joyce O'Neal McCormick

Joyce O'Neal McCormick

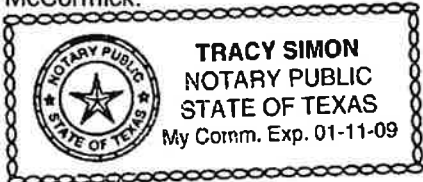
STATE OF TEXAS

§
§
§

COUNTY OF TRAVIS

WILLIAMSON

This instrument was acknowledged before me on the 05 day of October, 2006, by Charles A. McCormick.



Tracy Simon
NOTARY PUBLIC, State of Texas

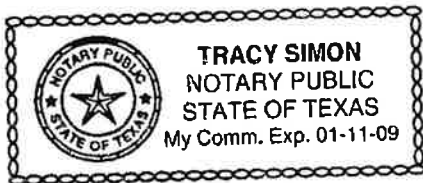
STATE OF TEXAS

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COUNTY OF TRAVIS

WILLIAMSON

This instrument was acknowledged before me on the 05 day of October, 2006, by Joyce O'Neal McCormick.



Tracy Simon
NOTARY PUBLIC, State of Texas

EXHIBIT A

Partnership's Property

All of the property conveyed to Charles A. McCormick and any property conveyed to Charles A. McCormick and Joyce O'Neal McCormick, each to the extent in the John Bailey Survey No. 7, Abstract No. 55, Williamson County, Texas, including the property conveyed to Charles A. McCormick described in the following instruments:

1. Partition Deed dated November 26, 1994 recorded in Volume 2644, Page 632, Official Records, Williamson County, Texas;

2. Contract of Sale & Purchased from the Veteran's Land Board dated January 31, 1950 recorded in Volume 359, Page 455, Deed Records, Williamson County, Texas;

3. Deed dated December 22, 1970 recorded in Volume 532, Page 721, Deed Records, Williamson County, Texas; and

4. Deed recorded in Volume 397, Page 141, Deed Records, Williamson County, Texas;

SAVE AND EXCEPT the portions thereof conveyed by the Gift Deeds to the Children dated April 29, 2005 and recorded under Clerk's Document # 2005034735 and 2005036490, as corrected, in the Official Records for Williamson County, Texas.

EXHIBIT B

Restrictions

No mobile or manufactured homes shall be parked or placed on the Partnership Property or used as a residence, either temporary or permanent, at any time provided, however, that temporary structures necessary for storage of tools and equipment, and for office space for architects, builders, workmen, and foremen during actual construction may be maintained for the duration of the construction but not to exceed a period of 1 year without obtaining the approval of the Board of Directors of the McCormick Ranch Property Owners' Association, Inc. for extending past 1 year.

AFTER RECORDING RETURN TO:

William H. Locke, Jr.
Graves, Dougherty, Hearon & Moody
401 Congress, Suite 2200
Austin, Texas 78701

Telephone: (512) 480-5736
Telecopier: (512) 480-5837

GRANTEE'S ADDRESS:

c/o Charles A. McCormick
4306 Miramar Drive
Georgetown, Texas 78638-1358

FILED AND RECORDED

OFFICIAL PUBLIC RECORDS 2008001012

Nancy E. Rister

01/03/2008 10:41 AM

PHERBRICH \$36.00

NANCY E. RISTER, COUNTY CLERK
WILLIAMSON COUNTY, TEXAS

Exhibit 3
Secretary of State Document



Comptroller of Public Accounts FORM 05-102 (Rev.9-11/30)

Texas Franchise Tax Public Information Report

To be filed by Corporations, Limited Liability Companies (LLC) and Financial Institutions
This report MUST be signed and filed to satisfy franchise tax requirements

■ Tcode 13196 Franchise

■ Taxpayer number

■ Report year

3 2 0 3 5 1 1 0 3 1 4

2 0 2 0

You have certain rights under Chapter 552 and 559, Government Code, to review, request, and correct information we have on file about you. Contact us at (800) 252-1381 or (512) 463-4600.

Taxpayer name MCCORMICK CHILDREN'S FAMILY LIMITED PARTNERSHIP				Secretary of State (SOS) file number or Comptroller file number 0800716668	
Mailing address 8 LUNDYS LN					
City RICHARDSON	State TX	ZIP Code 75080	Plus 4		

● Blacken circle if there are currently no changes from previous year; if no information is displayed, complete the applicable information in Sections A, B and C.

Principal office 8 LUNDY'S LN RICHARDSON, TX 75080-2342
Principal place of business TEXAS

Please sign below!

Officer, director and manager information is reported as of the date a Public Information Report is completed. The information is updated annually as part of the franchise tax report. There is no requirement or procedure for supplementing the information as officers, directors, or managers change throughout the year.



SECTION A Name, title and mailing address of each officer, director or manager.

3203511031420

Name MCCORMICK CHILDREN'S FLP GP, INC.	Title GENERAL PA	Director <input type="radio"/> YES	Term expiration m m d d y y
Mailing address 8 LUNDY'S LANE	City RICHARDSON	State TX	ZIP Code 75080
Name	Title	Director <input type="radio"/> YES	Term expiration m m d d y y
Mailing address	City	State	ZIP Code
Name	Title	Director <input type="radio"/> YES	Term expiration m m d d y y
Mailing address	City	State	ZIP Code

SECTION B Enter the information required for each corporation or LLC, if any, in which this entity owns an interest of 10 percent or more.

Name of owned (subsidiary) corporation or limited liability company	State of formation	Texas SOS file number, if any	Percentage of ownership
Name of owned (subsidiary) corporation or limited liability company	State of formation	Texas SOS file number, if any	Percentage of ownership

SECTION C Enter the information required for each corporation or LLC, if any, that owns an interest of 10 percent or more in this entity or limited liability company.

Name of owned (parent) corporation or limited liability company	State of formation	Texas SOS file number, if any	Percentage of ownership
---	--------------------	-------------------------------	-------------------------

Registered agent and registered office currently on file. (see instructions if you need to make changes) ● Blacken circle if you need forms to change the registered agent or registered office information.

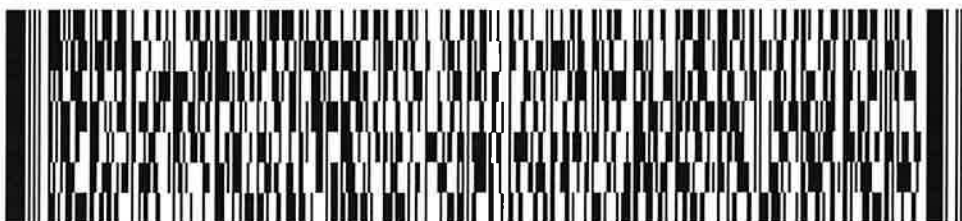
Agent: MCCORMICK CHILDREN'S FLP GP, INC.	City RICHARDSON	State TX	ZIP Code 75080
Office: 8 LUNDY'S LANE			

The above information is required by Section 171.203 of the Tax Code for each corporation or limited liability company that files a Texas Franchise Tax Report. Use additional sheets for Sections A, B, and C, if necessary. The information will be available for public inspection.

I declare that the information in this document and any attachments is true and correct to the best of my knowledge and belief, as of the date below, and that a copy of this report has been mailed to each person named in this report who is an officer, director or manager and who is not currently employed by this, or a related, corporation or limited liability company.

sign here PATRICIA M MULVIHILL	Title Electronic	Date 03-15-2020	Area code and phone number (214) 770 - 2581
--	----------------------------	---------------------------	---

Texas Comptroller Official Use Only



VE/DE	<input type="radio"/>	PIR IND	<input type="radio"/>
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Exhibit 4

Certificate of Formation

Form 201

Secretary of State
P.O. Box 13697
Austin, TX 78711-3697
FAX: 512/463-5709

Filing Fee: \$300



**Certificate of Formation
For-Profit Corporation**

Filed in the Office of the
Secretary of State of Texas
Filing #: 800993838 06/19/2008
Document #: 219592050002
Image Generated Electronically
for Web Filing

Article 1 - Entity Name and Type

The filing entity being formed is a for-profit corporation. The name of the entity is:

McCORMICK CHILDREN'S FLP GP, INC.

The name must contain the word "corporation," "company," "incorporated," "limited," or an abbreviation of one of these terms. The name must not be the same as, deceptively similar to or similar to that of an existing corporate, limited liability company, or limited partnership name on file with the secretary of state. A preliminary check for "name availability" is recommended.

Article 2 - Registered Agent and Registered Office

A. The initial registered agent is an organization (cannot be corporation named above) by the name of:

OR

B. The initial registered agent is an individual resident of the state whose name is set forth below:

Name:

Charles A. McCormick

C. The business address of the registered agent and the registered office address is:

Street Address:

4306 Miramar Drive Georgetown TX 78628

Article 3 - Directors

The number of directors constituting the initial board of directors and the names and addresses of the person or persons who are to serve as directors until the first annual meeting of shareholders or until their successors are elected and qualified are set forth below:

Director 1: **Charles A. McCormick**

Address: **4306 Miramar Georgetown TX, USA 78628**

Director 2: **Joyce McCormick**

Address: **4306 Miramar Georgetown TX, USA 78628**

Director 3: **Margaret M. Wardlaw**

Address: **19910 Park Ranch San Antonio TX, USA 78259**

Director 4: **Tasnim M. Benhalim**

Address: **7305 La Sobrina Dallas TX, USA 75248**

Director 5: **Ruth M. Merton**

Address: **4311 Miramar Georgetown TX, USA 78628**

Director 6: **Charles O. McCormick**

Address: **2035 Wood Glen Drive Round Rock TX, USA 78681**

Director 7: **Haziel M. Williams**

Address: **19926 Park Hollow San Antonio TX, USA 78259**

Director 8: **Patricia M. Mulvihill**

Address: **8 Lundys Ln Richardson TX, USA 75080**

Article 4 - Authorized Shares

The total number of shares the corporation is authorized to issue and the par value of each of such shares, or a statement that such shares are without par value, is set forth below.

Number of Shares	Par Value (must choose and complete either A or B)	Class	Series

1,000,000

- A. has a par value of \$.01
 B. without par value.

If the shares are to be divided into classes, you must set forth the designation of each class, the number of shares of each class, and the par value (or statement of no par value), of each class. If shares of a class are to be issued in series, you must provide the designation of each series. The preferences, limitations, and relative rights of each class or series must be stated in space provided for supplemental information.

Article 5 - Purpose

The purpose for which the corporation is organized is for the transaction of any and all lawful business for which corporations may be organized under the Texas Business Organizations Code.

Supplemental Provisions / Information

[The attached addendum, if any, is incorporated herein by reference.]

Effectiveness of Filing

A. This document becomes effective when the document is filed by the secretary of state.

OR

B. This document becomes effective at a later date, which is not more than ninety (90) days from the date of its signing. The delayed effective date is:

Organizer

The name and address of the organizer is set forth below.

Charles A. McCormick 4306 Miramar, Georgetown, TX 78628

Execution

The undersigned signs this document subject to the penalties imposed by law for the submission of a materially false or fraudulent instrument.

Charles A. McCormick

Signature of organizer

FILING OFFICE COPY

Application Exhibit 41

Hearing Requestor Elizabeth Ann Friou's
Reply to Responses to Hearing Request

TCEQ DOCKET NO. 2022-1552-AIR

**APPLICATION BY EXFLUOR
RESEARCH CORPORATION FOR
AIR QUALITY PERMIT NO. 165848
IN WILLIAMSON COUNTY, TEXAS**

§
§
§

**BEFORE THE
TEXAS COMMISSION ON
ENVIRONMENTAL QUALITY**

**HEARING REQUESTOR ELIZABETH ANN FRIOU'S
REPLY TO RESPONSES TO HEARING REQUESTS**

TO THE HONORABLE COMMISSIONERS:

Elizabeth Ann Friou (“Friou”) owns property within .1 miles from Exflur’s proposed operations and files this her Reply to Responses to Hearing Requests (the “Reply”) filed by the Executive Director of the Texas Commission on Environmental Quality (“ED”), the Office of Public Interest Counsel (“OPIC”) and Exflur Research Corporation (“Exflur”).

I. Reply to TCEQ ED’s Response

The ED properly concluded that Friou is an affected person and recommended that her hearing request be granted.¹

II. Reply to OPIC’s Response

OPIC also properly concluded that Friou is an affected person and recommended that her request be granted.²

III. Reply to Exflur’s Response

Exflur also properly concluded that Friou has a personal justiciable interest in Exflur’s application.³ However, their conclusion appears to be conditioned upon Friou providing additional demonstration that she owns her property across the street from Exflur’s proposed site. Exflur is correct, Ann Wheelock Friou Individually and as the Independent Executor of the Estate of

¹ ED’s Response at pdf pp. 40.

² OPIC’s Response at 18-19.

³ Exflur’s Response at 25-26.

Thomas Friou as Trustee is the record owner of both parcels identified as Map ID 5 on Exflur's Map 2.⁴ As shown on the attached Affidavit of Identity, Ann Wheelock Friou is the same person as Elizabeth Ann Friou.⁵ Accordingly, Friou has a right, title, and interest impacted by Exflur's application, has a personal justiciable interest as set out in her hearing requests, and is an affected person.

IV. Conclusion

Friou incorporates herein her previously filed requests for contested case hearing, respectfully requests that she be granted affected person status and that her request for a contested case hearing be granted, and respectfully requests any other relief to which she is entitled.

Respectfully Submitted,

GRAVES, DOUGHERTY, HEARON & MOODY, P.C.
401 Congress Avenue, Suite 2700
Austin, Texas 78701
Telephone: (512) 480-5639
Telecopier: (512) 536-9939

By: /s/ Natasha J. Martin

Natasha J. Martin
State Bar No. 24083255
nmartin@gdhm.com

ATTORNEY FOR ELIZABETH ANN FRIOU

⁴ See Exflur's Response at Attachment A, JW-Ex-2, Map 2 (labeling Friou's property as Map ID 5); See also ED's Response at Map B (labeling Friou's property as Map ID 4); See also Elizabeth Ann Friou's October 11, 2022 Contested Case Hearing Request, Attachment A (labeling Friou's property as Friou Parcels 1 and 2)

⁵ See Exhibit A, Affidavit of Identity.

Certificate of Service

I hereby certify that a true and correct copy of the foregoing document has been forwarded via electronic filing, electronic mail, electronic submittal or U.S. Mail to the persons on the attached Service List on this the 5th day of December 2022.

By: /s/ Natasha J. Martin
Natasha J. Martin

SERVICE LIST
EXFLUOR RESEARCH CORPORATION
TCEQ DOCKET NO. 2022-1552-AIR
PERMIT NO. 165848

FOR THE CHIEF CLERK:

via electronic filing

Laurie Gharis, Chief Clerk
Texas Commission on Environmental
Quality
Office of Chief Clerk
P.O. Box 13087, MC-105
Austin, TX 78711-3087

FOR THE APPLICANT:

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bierschenk_t@exfluor.com

FOR THE TCEQ EXTERNAL RELATIONS
DIVISION

Ryan Vise, Deputy Director
Texas Commission on Environmental
Quality
External Relations Division
Public Education Program, MC-108
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FOR THE PUBLIC INTEREST COUNSEL:

Pranjal Mehta
Texas Commission on Environmental
Quality
Office of Public Interest Counsel
P.O. Box 13087, MC-103
Austin, TX 78711-3087
Pranjal.Mehta@Tceq.Texas.Gov

FOR ALTERNATIVE DISPUTE
RESOLUTION

via electronic mail:
Kyle Lucas
Texas Commission on Environmental
Quality
Alternative Dispute Resolution, MC-222
P.O. Box 13087
Austin, Texas 78711
Tel: (512) 239-0687
Fax: (512) 239-4015
kyle.lucas@tceq.texas.gov

FOR THE REQUESTERS:

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800 Hidden Bear Rd.
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patmulv@swbell.net

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Peggy Anne Wardlaw
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San Antonio, TX 78259-1934
HaroldWardlaw@gmail.com
peggywardlaw@hotmail.com

Shannon White-Shubert
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swshubert@gmail.com

Haziel McCormick Williams
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haziel.williams@gmail.com

For Elizabeth Ann Friou
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For the North San Gabriel Alliance
Lauren Ice
Perales Allmon & Ice PC
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christa@txenvirolaw.com
lauren@txenvirolaw.com

For TCEQ Executive Director
Betsy Peticolas, Staff Attorney
Environmental Law Division
(512) 239-6033
Abigail Adkins, Staff Attorney
Environmental Law Division
(512) 239-2496
PO Box 13087, MC 173
Austin, Texas 78711-3087
Betsy.Peticolas@Tceq.Texas.Gov
Abigail.Adkins@Tceq.Texas.Gov

Exhibit A

AFFIDAVIT OF IDENTITY

THE STATE OF TEXAS

§
§
§



TRV

2017090057

COUNTY OF TRAVIS

2 PGS

BEFORE ME, the undersigned authority, a notary public in and for the State of Texas, on this day personally appeared Elizabeth Ann Friou ("Affiant"), known to me to be the person who subscribed her name below, who, after having first been duly sworn by me, on oath deposes and says:

That she, Affiant, is the same person as Ann Wheelock Friou.

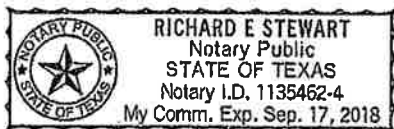
EXECUTED this 28th day of May, 2017.

AFFIANT:

Elizabeth Ann Friou
Elizabeth Ann Friou

SUBSCRIBED AND SWORN TO BEFORE ME this the 28th day of May, 2017

2017.



Richard E Stewart
NOTARY PUBLIC, State of Texas

My Commission Expires:

Sept. 17, 2018.

Print Name Richard E. Stewart

THE STATE OF TEXAS

§
§
§

COUNTY OF TRAVIS Hays
RES

This instrument was acknowledged before me on May 28, 2017, by Elizabeth Ann Friou.

[SEAL]

Richard E Stewart
NOTARY PUBLIC, State of Texas
Print Name: Richard E. Stewart

My Commission Expires:

Sept. 17, 2018.

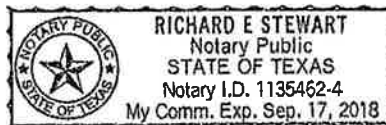


Exhibit A

RETURN

HURST SAVAGE & VANDERBURG LLP
814 W 10TH ST
AUSTIN TX 78701

FILED AND RECORDED

OFFICIAL PUBLIC RECORDS



Jun 06, 2017 10:22 AM 2017090067

RAMIREZA: \$30.00

Dana DeBeauvoir, County Clerk

Travis County TEXAS

Application Exhibit 42

TCEQ ED - Supplemental Commission Backup Material

TEXAS COMMISSION ON ENVIRONMENTAL QUALITY



December 5, 2022

Laurie Gharis, Chief Clerk
Texas Commission on Environmental Quality
P.O. Box 13087, MC 105
Austin, Texas 78711-3087

Re: Supplemental Backup Material for Commission's Consideration of Hearing
Requests and Requests for Reconsideration
Exflor Research Corporation
Permit No. 165848
TCEQ DOCKET NUMBER 2022-1552-AIR

Dear Ms. Gharis:

Enclosed please find a copy of the updated Air Quality Analysis Audit memorandum for inclusion in the background material for the above referenced permit application.

If you have any questions, please do not hesitate to call me at extension 6033 or Abigail Adkins at extension 2496.

Sincerely,

A handwritten signature in black ink, appearing to read "Betsy Peticolas".

Betsy Peticolas
Staff Attorney
Environmental Law Division

Enclosures

TCEQ Interoffice Memorandum

To: Cara Hill
Mechanical/Coatings Section

Thru: Chad Dumas, Team Leader
Air Dispersion Modeling Team (ADMT)

From: Ahmed Omar, P.E.
ADMT

Date: December 5, 2022

Subject: **Amended Air Quality Analysis Audit – Exflour Research Corporation (RN110969227)**

1. Project Identification Information

Permit Application Number: 165848
NSR Project Number: 331049
ADMT Project Number: 8329
County: Williamson
Published Map: [\\tceq4avmgisdata\GISWRK\APD\MODEL PROJECTS\8329\8329.pdf](#)

Air Quality Analysis: Submitted by Waid Environmental, October 2021, on behalf of Exflour Research Corporation. Additional information was provided November 2021 and November 2022.

2. Report Summary

The air quality analysis is acceptable, as supplemented by the ADMT, for all review types and pollutants. The results are summarized below.

This modeling audit was updated for this NSR project number based on information provided by the applicant correcting its hydrogen fluoride analysis over agricultural areas using the 24-hr averaging time instead of the 1-hr averaging time. Additionally, while reviewing the updated information, the ADMT identified a discrepancy in the averaging time used for the long-term analysis for pollutants hydrogen fluoride, carbonyl fluoride, and trifluoroacetic acid over agricultural areas with cattle. The ADMT has evaluated the discrepancy and reported the results below. The update did not change the ADMT's conclusion that the air quality analysis is acceptable. This amended modeling audit memo represents a complete summary and supersedes the first modeling audit memo dated November 18, 2021 (WCC Content ID 5843027).

A. Minor Source NSR and Air Toxics Analysis

Table 1. Modeling Results for Minor NSR De Minimis

Pollutant	Averaging Time	GLCmax ($\mu\text{g}/\text{m}^3$)	De Minimis ($\mu\text{g}/\text{m}^3$)
PM ₁₀	24-hr	0.1	5
PM _{2.5}	24-hr	0.1	1.2

TCEQ Interoffice Memorandum

Pollutant	Averaging Time	GLCmax ($\mu\text{g}/\text{m}^3$)	De Minimis ($\mu\text{g}/\text{m}^3$)
PM _{2.5}	Annual	0.01	0.2
NO ₂	1-hr	7	7.5
NO ₂	Annual	0.1	1
CO	1-hr	10	2000
CO	8-hr	3	500

The GLCmax are the maximum predicted concentrations associated with one year of meteorological data.

Generic modeling was used for the above analyses; refer to section 3 for more details on the generic modeling.

The justification for selecting the EPA's interim 1-hr NO₂ De Minimis level was based on the assumptions underlying EPA's development of the 1-hr NO₂ De Minimis level. As explained in EPA guidance memoranda¹, the EPA believes it is reasonable as an interim approach to use a De Minimis level that represents 4% of the 1-hr NO₂ NAAQS.

The PM_{2.5} De Minimis levels are the EPA recommended De Minimis levels. The use of the EPA recommended De Minimis levels is sufficient to conclude that a proposed source will not cause or contribute to a violation of a PM_{2.5} NAAQS based on the analyses documented in EPA guidance and policy memorandums².

To evaluate secondary PM_{2.5} impacts, the applicant provided an analysis based on a Tier 1 demonstration approach consistent with the EPA's Guideline on Air Quality Models. Specifically, the applicant used a Tier 1 demonstration tool developed by the EPA referred to as Modeled Emission Rates for Precursors (MERPs). The basic idea behind the MERPs is to use technically credible air quality modeling to relate precursor emissions and peak secondary pollutants impacts from a source. Using data associated with the worst-case source, the applicant estimated 24-hr and annual secondary PM_{2.5} concentrations of 0.0001 $\mu\text{g}/\text{m}^3$ and <0.0001 $\mu\text{g}/\text{m}^3$, respectively. When these estimates are added to the GLCmax listed in the table above, the results are less than the De Minimis levels.

¹ www.tceq.texas.gov/assets/public/permitting/air/memos/guidance_1hr_no2naaqs.pdf

² www.tceq.texas.gov/permitting/air/modeling/epa-mod-guidance.html

TCEQ Interoffice Memorandum

Table 2. Minor NSR Site-wide Modeling Results for Health Effects

Pollutant	CAS#	Averaging Time	GLCmax ($\mu\text{g}/\text{m}^3$)	GLCmax Location	GLCni ($\mu\text{g}/\text{m}^3$)	GLCni Location	ESL ($\mu\text{g}/\text{m}^3$)
hydrogen fluoride	7664-39-3	1-hr	6	-	<6	-	18
hydrogen fluoride For air permit reviews in agricultural areas	7664-39-3	24-hr	1.1	-	-	-	3
hydrogen fluoride For air permit reviews in agricultural areas with cattle	7664-39-3	30-days	0.46	-	-	-	0.75
fluorine	7782-41-4	1-hr	3.9	Western Property Line	3.9	Western Property Line	2
perfluoroheptane	335-57-9	1-hr	22	-	<22	-	20000
methanol	67-56-1	1-hr	38	-	<38	-	3900
perfluorooctanoic acid and its inorganic salts	335-67-1	1-hr	<0.01	-	<0.01	-	0.05
bromine	7726-95-6	1-hr	5	-	<5	-	7
hydrogen chloride	7647-01-0	1-hr	4	-	<4	-	190
hydrogen chloride	7647-01-0	Annual	0.1	-	<0.1	-	7.9
carbon tetrafluoride	75-73-0	1-hr	154	-	<154	-	18000
Perfluoro (bis-2-chloroethoxy methane)	Not found	1-hr	7	-	<7	-	200
Perfluorodecalin	306-94-5	1-hr	22	-	<22	-	200
polymers of chlorotrifluoroethylene (PCTFE)	9002-83-9	1-hr	17	-	<17	-	50

TCEQ Interoffice Memorandum

Pollutant	CAS#	Averaging Time	GLCmax ($\mu\text{g}/\text{m}^3$)	GLCmax Location	GLCni ($\mu\text{g}/\text{m}^3$)	GLCni Location	ESL ($\mu\text{g}/\text{m}^3$)
carbonyl fluoride For air permit reviews in agricultural areas with cattle	353-50-4	30-days	0.24	-	<0.03	-	0.71
trifluoroacetic acid For air permit reviews in agricultural areas with cattle	76-05-1	30-days	0.27	-	<0.03	-	0.71

Table 3. Minor NSR Hours of Exceedance for Health Effects

Pollutant	Averaging Time	1 X ESL GLCni
fluorine	1-hr	99

For fluorine, the GLCmax and the GLCni are the same. Pollutant-specific modeling was conducted for fluorine. For all other pollutants and averaging times, generic modeling was used; refer to section 3 for more details on the generic modeling.

The applicant evaluated the long-term hydrogen fluoride, carbonyl fluoride, and trifluoroacetic acid analyses over agricultural areas with cattle based on the annual averaging time instead of the 30-day averaging time. For carbonyl fluoride and trifluoroacetic acid analyses over agricultural areas with cattle, the ADMT used 24-hr unit impact multipliers (UIMs) to evaluate the 30-day averaging times, which is conservative. The 24-hr results are less than the 30-day ESLs and will not affect overall conclusions. For the hydrogen fluoride analysis over agricultural areas with cattle, the ADMT conducted modeling using the 30-day averaging time. The 30-day results are less than the ESL and will not affect overall conclusions. The ADMT supplemented the long-term results for these three analyses in Table 2 above.

TCEQ Interoffice Memorandum

3. Model Used and Modeling Techniques

AERMOD (Version 21112) was used in a refined screening mode.

A unitized emission rate of 1 lb/hr was used to predict a generic short-term and long-term impact for each source. The generic impact was multiplied by the proposed pollutant specific emission rates to calculate a maximum predicted concentration for each source. The maximum predicted concentration for each source was summed to get a total predicted concentration for each pollutant. Pollutant-specific modeling was conducted for fluorine.

A. Land Use

Medium roughness and elevated terrain were used in the modeling analysis. These selections are consistent with the AERSURFACE analysis, topographic map, DEMs, and aerial photography. The selection of medium roughness is reasonable.

B. Meteorological Data

Surface Station and ID: Austin, TX (Station #: 13904)
Upper Air Station and ID: Fort Worth, TX (Station #: 3990)
Meteorological Dataset: 2016
Profile Base Elevation: 150.9 meters

C. Receptor Grid

The grid modeled was sufficient in density and spatial coverage to capture representative maximum ground-level concentrations.

D. Building Wake Effects (Downwash)

Input data to Building Profile Input Program Prime (Version 04274) are consistent with the aerial photography, plot plan, and modeling report.

4. Modeling Emissions Inventory

The modeled emission point and volume source parameters and rates were consistent with the modeling report. The source characterizations used to represent the sources were appropriate.

The applicant assumed full conversion of NO_x to NO₂, which is conservative.

Maximum allowable hourly emission rates were used for the short-term averaging time analyses, and annual average emission rates were used for the annual averaging time analyses.

Filing on Permit Number/Docket Number 2022-1552-AIR

Haley.Byers@tceq.texas.gov <Haley.Byers@tceq.texas.gov>

Mon 12/5/2022 3:06 PM

To: EFiling <EFiling@tceq.texas.gov>

FILING CONFIRMATION NUMBER 774544082022339**REGULATED ENTY NAME** EXFLUOR RESEARCH**RN NUMBER:** RN110969227**PERMIT NUMBER:** 165848**DOCKET NUMBER:** 2022-1552-AIR**COUNTY:** WILLIAMSON**PRINCIPAL NAME:** EXFLUOR RESEARCH CORPORATION, CN602696791**FROM****FILED BY:** Hbyers**FILED FOR NAME:** Betsy Peticolas**E-MAIL:** Haley.Byers@tceq.texas.gov**PHONE:** 512-239-0600**DOCUMENT NAME:** Exflour supplemental Agenda Backup.pdf

Based on 30 TAC Section 1.10(h), the TCEQ General Counsel has waived the filing requirements of Section 1.10(c) to allow the filing of documents using this online system. The General Counsel also has waived the requirements of Section 1.10(e) so that the time of filing your documents is the time this online system receives your filings. Filings are considered timely if received by close of business (usually 5:00 p.m. CST) on the deadline date unless otherwise ordered. If your document is 20 pages or less (including cover letter, mailing list, and attachments) and it is for Commission consideration at an open meeting, the General Counsel has also waived the requirement of Section 1.10(d) to file paper copies with the Office of the Chief Clerk.

Application Exhibit 43

TCEQ ED and Applicant Correspondence on Availability of Permitting Files

Seal, Derek L.

From: Cara Hill <Cara.Hill@Tceq.Texas.Gov>
Sent: Tuesday, December 13, 2022 10:51 AM
To: Seal, Derek L.
Cc: Abigail Adkins
Subject: RE: Executive Director's Response to Hearing Requests and Requests for Reconsideration; Exflur Research Corporation; TCEQ Docket No. 2022-1552-AIR; Permit No. 165848

CAUTION: EXTERNAL EMAIL – Only click links or open attachments from trusted senders.

Okay. If it helps, the confidential file consists of the confidential files submitted with the initial application on 7/9/2021, and the confidential files with the NOD response submitted 9/2/2022.

Thanks,
Cara

How is our customer service? www.tceq.texas.gov/customersurvey

From: Seal, Derek L. <dseal@mcginnislaw.com>
Sent: Tuesday, December 13, 2022 10:40 AM
To: Cara Hill <Cara.Hill@Tceq.Texas.Gov>
Cc: Abigail Adkins <Abigail.Adkins@tceq.texas.gov>
Subject: RE: Executive Director's Response to Hearing Requests and Requests for Reconsideration; Exflur Research Corporation; TCEQ Docket No. 2022-1552-AIR; Permit No. 165848

Thank you! I have the confidential material submitted by Waid, but I prefer to make sure everything we have in our files matches what is in TCEQ's files. We can start with what we have and work from there. Thanks again!

From: Cara Hill <Cara.Hill@Tceq.Texas.Gov>
Sent: Tuesday, December 13, 2022 10:24 AM
To: Seal, Derek L. <dseal@mcginnislaw.com>
Cc: Abigail Adkins <Abigail.Adkins@tceq.texas.gov>
Subject: RE: Executive Director's Response to Hearing Requests and Requests for Reconsideration; Exflur Research Corporation; TCEQ Docket No. 2022-1552-AIR; Permit No. 165848

CAUTION: EXTERNAL EMAIL – Only click links or open attachments from trusted senders.

Hi Derek,

I've attached the non-confidential portion of the file. This is everything I have that is non-confidential. There is a confidential section of the application, but I believe that has to be requested through a PIR since it would need to go to the AG's office to determine what can be released. Let me know if you need anything else.

Thanks,
Cara

From: Seal, Derek L. <dseal@mcginnislaw.com>
Sent: Tuesday, December 13, 2022 10:03 AM

Abbey

From: Seal, Derek L. <dseal@mcginnislaw.com>

Sent: Tuesday, December 13, 2022 8:01 AM

To: Abigail Adkins <abbeyadkins@tamu.edu>; Amanda Kraynok <Amanda.Kraynok@tceq.texas.gov>; Abigail Adkins <Abigail.Adkins@tceq.texas.gov>

Subject: FW: Executive Director's Response to Hearing Requests and Requests for Reconsideration; Exflur Research Corporation; TCEQ Docket No. 2022-1552-AIR; Permit No. 165848

Amanda and Abigail,

I expect that the Commissioners will refer the Exflur air permit application to a contested case hearing tomorrow, so Exflur will need to prepare the administrative record to file with the Chief Clerk.

We will obtain all of the permitting files that the Chief Clerk has, but in my experience, there are almost always other files that the ED's folks such as the permit engineer may have which were not forwarded to the Chief Clerk. What is the best way to make sure we have copies of those files so that we can include them with the administrative record? Thanks!

Derek L Seal

Partner

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***PLEASE NOTE OUR NEW ADDRESS**

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From: Haley Byers <Haley.Byers@tceq.texas.gov>

Sent: Monday, November 21, 2022 5:04 PM

To: Seal, Derek L. <dseal@mcginnislaw.com>; bierschenk_t@exflur.com; nicole.e.imperial@gmail.com; akbeville@gmail.com; terry.cook@wilco.org; sheryl.farley@gmail.com; jillian.gabriel@gmail.com; rfgabish@msn.com; KELLEYHEATH1@GMAIL.COM; suzjohnson@prodigy.net; ctr2000@hotmail.com; alycenmalone@gmail.com; chasomcc@gmail.com; chasomcc@gmail.com; erin.mccormick90@gmail.com; chasomcc@gmail.com; jimmy.nicholasmccormick@gmail.com; twmcdaniel@hotmail.com; Karen.milone@cnxcorp.com; nmartin@gdhm.com; christa@txenvirolaw.com; lauren@txenvirolaw.com; theplan@swbell.net; patmulv@swbell.net; joeipacheco@gmail.com; reneerisingsun@gmail.com; Topher.peyton@gmail.com; jccspies@gmail.com; slthurman1951@gmail.com; brittdvarner@gmail.com; peggywardlaw@hotmail.com; HaroldWardlaw@gmail.com; swshubert@gmail.com; haziel.williams@gmail.com

Cc: PEP <pep@tceq.texas.gov>; Pranjal Mehta <Pranjal.Mehta@Tceq.Texas.Gov>; Kyle Lucas <Kyle.Lucas@tceq.texas.gov>; Betsy Peticolas <Betsy.Peticolas@Tceq.Texas.Gov>

Subject: Executive Director's Response to Hearing Requests and Requests for Reconsideration; Exflur Research Corporation; TCEQ Docket No. 2022-1552-AIR; Permit No. 165848

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Good afternoon,

Based on 30 TAC Section 1.10(h), the TCEQ General Counsel has waived the filing requirements of Section 1.10(c) to allow the filing of documents using this online system. The General Counsel also has waived the requirements of Section 1.10(e) so that the time of filing your documents is the time this online system receives your filings. Filings are considered timely if received by close of business (usually 5:00 p.m. CST) on the deadline date unless otherwise ordered. If your document is 20 pages or less (including cover letter, mailing list, and attachments) and it is for Commission consideration at an open meeting, the General Counsel has also waived the requirement of Section 1.10(d) to file paper copies with the Office of the Chief Clerk.

Application Exhibit 44

TCEQ Commission Interim Order

Jon Niermann, *Chairman*
Emily Lindley, *Commissioner*
Bobby Janecka, *Commissioner*
Erin E. Chancellor, *Interim Executive Director*



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

December 22, 2022

TO: Persons on the attached mailing list.

RE: Exflor Research Corporation
TCEQ Docket No. 2022-1552-AIR; TCEQ Permit No. 165848

Enclosed is a copy of an interim order issued by the Commission regarding the above-referenced matter.

Should you have any questions, please contact Mehgan Taack of the Texas Commission on Environmental Quality's Office of the Chief Clerk (MC 105) at (512) 239-3313.

Sincerely,

A handwritten signature in cursive script that reads "Laurie Gharis".

Laurie Gharis
Chief Clerk

LG/mt

Enclosure

MAILING LIST
Exflur Research Corporation
TCEQ Docket No. 2022-1552-AIR; TCEQ Permit No. 165848

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LIBERTY HILL TX 78642-3726

PARKJER , MR CARVEY LEE
105 ROSA DR
LIBERTY HILL TX 78642-2190

PATEL , TANARA
128 RAVELLO ST
LIBERTY HILL TX 78642-2306

PATTERSON , EMILY
140 PARRYI CV
LEANDER TX 78641-4720

PAVLICEK , ALOIS
1105 DEER RUN
ROUND ROCK TX 78681-6436

PEARSON , BONNIE
5545 COUNTY ROAD 200
LIBERTY HILL TX 78642-3721

PEARSON , LOYD
351 COUNTY ROAD 210
LIBERTY HILL TX 78642-3741

PEARSON , RON
5545 COUNTY ROAD 200
LIBERTY HILL TX 78642-3721

PEYTON , CHRIS
132 KRUPP AVE
LIBERTY HILL TX 78642-4476

PEYTON , CHRIS
121 NIGHT BLOOM PATH
LIBERTY HILL TX 78642-2365

PEYTON , RENEE
132 KRUPP AVE
LIBERTY HILL TX 78642-4476

PEYTON , RENEE
121 NIGHT BLOOM PATH
LIBERTY HILL TX 78642-2365

PICINICH , CARLA
2101 COUNTY ROAD 226
FLORENCE TX 76527-4868

POINTER , MRS CORRINA
162 ELISHA DR
LIBERTY HILL TX 78642-2257

PORTER , PATTI
411 BLESSING RANCH RD
LIBERTY HILL TX 78642-4588

PRIMROSE , BRYAN
3901 COUNTY ROAD 258
LIBERTY HILL TX 78642-2106

PRIMROSE , JACKIE
3901 COUNTY ROAD 258
LIBERTY HILL TX 78642-2106

RAHBARI , GINA
232 HOOT OWL LN N
LEANDER TX 78641-1733

REDDING , TRAVIS
595 GATLIN RANCH RD
LIBERTY HILL TX 78642-3312

RESTO , ANA R
3202 SPOTTED HORSE DR
KILLEEN TX 76542-8413

RHODES , BESSIE
14814 KINGSFORD WILLOW LN
CYPRESS TX 77429-7918

RICHARDSON , JAMES
131 SADDLE LN
LIBERTY HILL TX 78642-4065

RIDOLFI , LARRY A
FTL DRIVES INC
1051 COUNTY ROAD 204
LIBERTY HILL TX 78642-3792

RIVERA , DAVID
105 LARK ST
LEANDER TX 78641-1890

RIVES , BILLY
9755 E FM 243
BERTRAM TX 78605-3848

RIX , ERIKA
251 COUNTY ROAD 203
LIBERTY HILL TX 78642-3714

ROBBINS , RANDAL
249 COWBOY TRL
LIBERTY HILL TX 78642-3954

ROBBINS , WHITNEY
441 SIERRA MAR LOOP
LEANDER TX 78641-3544

ROBERTS , ASHTON
272 QUARTERHORSE DR
LIBERTY HILL TX 78642-3926

ROBERTS , JAMES
272 QUARTERHORSE DR
LIBERTY HILL TX 78642-3926

ROBION , CHRIS
104 REINDEER WAY
GEORGETOWN TX 78626-2547

ROCKE , MARIA YOLANDA
6433 COUNTY ROAD 200
LIBERTY HILL TX 78642-4026

ROCKE , MARK
6433 COUNTY ROAD 200
LIBERTY HILL TX 78642-4026

ROSS , KATY
614 SAN GABRIEL RANCH RD
LIBERTY HILL TX 78642-4555

RUSSELL , CHARLES
RR 1 BOX 93
TEXHOMA OK 73949-9634

RUSSELL , LEM
PO BOX 1294
STRATFORD TX 79084-1294

RUSSELL , MARGARET
RR 1 BOX 35
TEXHOMA OK 73949-9719

RUSSELL , SUSAN
RR 1 BOX 93
TEXHOMA OK 73949-9634

SALAZAR , CARI
301 DANIEL XING
LIBERTY HILL TX 78642-4499

SCHWERTNER , THE HONORABLE CHARLES STATE
SENATOR
THE SENATE OF TEXAS DISTRICT 5
PO BOX 12068
AUSTIN TX 78711-2068

SCOTT , BRIAN
300 ABBEY RD
LIBERTY HILL TX 78642-3953

SHIER , BILL
8429 BANGOR BND
AUSTIN TX 78758-7901

SHIFRIN , MARK
PO BOX 1059
LIBERTY HILL TX 78642-1059

SKOVIERA , ELLEN
1110 OAKLANDS DR
ROUND ROCK TX 78681-2702

SMART , NINA
212 KINGFISHER LN
LEANDER TX 78641-2691

SMITH , ROBERT
923 CASHEW LN
CEDAR PARK TX 78613-3241

SMITH , WANDA
900 COUNTY ROAD 236
FLORENCE TX 76527-4835

SPIES , JENNIFER
8907 RUSTIC CV
AUSTIN TX 78717-4853

STANFIELD , MICHELE
100 BUTTERCUP TRL
GEORGETOWN TX 78633-4746

STONEHILL-GARCIA , HEATHER
441 FALCON LN
LEANDER TX 78641-1771

STOUT , TIFFANY
405 LAKE SIDE DR
GEORGETOWN TX 78628-6902

SUAREZ , MS ELIZABETH
2273 COUNTY ROAD 223
FLORENCE TX 76527-4265

SWINT , MR THOMAS L
2809 FRESH SPRING RD
PFLUGERVILLE TX 78660-2381

TAIT , CALVIN
103 RIO ANCHO BLVD
LIBERTY HILL TX 78642-3570

TAYLOR , JEN
193 HOUSEFINCH LOOP
LEANDER TX 78641-1961

THRASH , TIM
865 COUNTY ROAD 208
FLORENCE TX 76527-4865

THRASH , WILLIAM
865 COUNTY ROAD 208
FLORENCE TX 76527-4865

THURMAN , SANDRA LEE
190 COUNTY ROAD 208
FLORENCE TX 76527-4472

TINSLEY , MASON
11 N BENTON WOODS CIR
THE WOODLANDS TX 77382-1513

TREACY , SUZE
2710 GLENWOOD TRL
CEDAR PARK TX 78613-5128

TUCKER , LARRY
5050 COUNTY ROAD 236
LIBERTY HILL TX 78642-3730

TUCKER , TERESA
5050 COUNTY ROAD 236
LIBERTY HILL TX 78642-3730

TURNER , PAUL KEITH
377 SUNDANCE TRL
LIBERTY HILL TX 78642-3851

ULBRICHT , DAWN
1 HILLWAY DR
ROUND ROCK TX 78664-9623

VAANDRAGER , TRACEY
701 BRIZENDINE RD
LIBERTY HILL TX 78642-3991

VALDEZ , SELENA
204 MOURNING DOVE LN
LEANDER TX 78641-1784

VARNER , BRITTANY D
PO BOX 1532
LIBERTY HILL TX 78642-1532

VARVIR COE , DR. MEGAN
1235 RIVER RIDGE RANCH RD
KILLEEN TX 76549-3332

WALLACE , LAURA S
3204 AZTEC FALL CV
AUSTIN TX 78746-1573

WALLER , FRANKIE
80 COUNTY ROAD 208
FLORENCE TX 76527-4484

WARDLAW , HAROLD CHARLES
19910 PARK RNCH
SAN ANTONIO TX 78259-1934

WARDLAW , PEGGY ANNE
19910 PARK RNCH
SAN ANTONIO TX 78259-1934

WARDLAW , SHAUNA
ED
125 RICHLAND VIEW RD
LIBERTY HILL TX 78642-4041

WARHOL , SUSAN M
1260 COUNTY ROAD 208
FLORENCE TX 76527-4628

WATKINS , JASON
308 BLESSING RANCH RD
LIBERTY HILL TX 78642-4505

WATKINS , NIKKI
51 COUNTY ROAD 153
GEORGETOWN TX 78626-1926

WEAVER , LISA & STEVE
258 COUNTY ROAD 250
GEORGETOWN TX 78633-4042

WEISSE , SCOTT
212 RIETI PKWY
LIBERTY HILL TX 78642-2309

WEMPE , CHARLES
6589 COUNTY ROAD 200
LIBERTY HILL TX 78642-3983

WEMPE , GREG
6589 COUNTY ROAD 200
LIBERTY HILL TX 78642-3983

WHEELOCK , DAVID
APT 6D
1801 LAVACA ST
AUSTIN TX 78701-1341

WHITE-SHUBERT , SHANNON
3404 CORTINA LN
ROUND ROCK TX 78681-2417

WHITNEY , KIMBERLY
475 COUNTY ROAD 218
FLORENCE TX 76527-4634

WHITTLESEY , SKYLER
220 ARREZO LN
GEORGETOWN TX 78628-7071

WILCOX , MR KEITH
PO BOX 640
FLORENCE TX 76527-0640

WILLIAMS , ASHLEY
APT 136
1616 W DALLAS ST
HOUSTON TX 77019-4770

WILLIAMS , CHARLES R
19926 PARK HOLW
SAN ANTONIO TX 78259-1924

WILLIAMS , ELIZABETH
APT D
616 CASTLE RIDGE RD
AUSTIN TX 78746-5181

WILLIAMS , HAZIEL MCCORMICK
19926 PARK HOLW
SAN ANTONIO TX 78259-1924

WILSON , JIM & MARY
278 LAMPASAS CT
KILLEEN TX 76549-4117

WILSON , MARISA
1618 COUNTY ROAD 204
LIBERTY HILL TX 78642-3586

WILSON , THE HONORABLE TERRY M STATE
REPRESENTATIVE
TEXAS HOUSE OF REPRESENTATIVES DISTRICT 20
PO BOX 2910
AUSTIN TX 78768-2910

WOOLF , MR ROBERT
305 LA DERA DR
LIBERTY HILL TX 78642-2122

WOOLF , SAMANTHA
305 LA DERA DR
LIBERTY HILL TX 78642-2122

TEXAS COMMISSION ON ENVIRONMENTAL QUALITY



AN INTERIM ORDER concerning the application by Exflor Research Corporation, for new Air Quality Permit No. 165848; TCEQ Docket No. 2022-1552-AIR

On December 14, 2022, the Texas Commission on Environmental Quality (Commission) considered during its open meeting several requests for hearing and reconsideration concerning the application by Exflor Research Corporation (Applicant), for new Air Quality Permit No. 165848 to authorize the construction of a new perfluorocarbons manufacturing plant. The site is located at 1100 County Road 236, Florence, Williamson County, Texas. The requests for hearing and reconsideration were evaluated under the requirements in the applicable statutes and Commission rules, including 30 Texas Administrative Code Chapter 55. The Commission also considered the responses to the requests for hearing and reconsideration filed by the Executive Director, the Office of Public Interest Counsel, and the Applicant; the replies filed by North San Gabriel Alliance, Shannon White-Shubert, and Elizabeth Ann Friou; all timely public comment; and the Executive Director's Response to Comment.

After evaluation of all relevant filings, the Commission determined that the North San Gabriel Alliance, Elizabeth Ann Friou, Suzanne Johnson, Patricia McCormick Mulvihill, Sandra Lee Thurman, Brittany Varner, Harold Wardlaw, Margaret Peggy McCormick Wardlaw, Shannon White-Shubert and Michael Shubert, and Haziell McCormick Williams are affected persons,

granted their requests for a hearing, and denied the remaining hearing requests and all requests for reconsideration. The Commission next determined whether the request for hearings raised disputed issues of fact or mixed questions of fact and law that were raised by the affected person during the comment period, and are relevant and material to its decision on the application. The Commission determined that the following issues meet those requirements and directed that they be referred to the State Office of Administrative Hearings (SOAH) for a contested case hearing:

- A) Whether the draft permit, including the maximum allowable emissions rates and chemical flexibility provisions, are protective of air quality, in accordance with Texas Health and Safety Code § 382.002;
- B) Whether the draft permit, including the maximum allowable emissions rates and chemical flexibility provisions, will be protective of the health of the requesters and their families, including sensitive subgroups in accordance with Texas Health and Safety Code §§ 382.002 and 382.0518(b)(2);
- C) Whether the draft permit, including the maximum allowable emissions rates and chemical flexibility provisions, are protective of animals and vegetation in accordance Texas Health and Safety Code § 382.002;
- D) Whether the draft permit is protective of the use and enjoyment of requesters' property, in accordance with 30 Texas Administrative Code § 101.4;
- E) Whether the application contains sufficient and accurate information for TCEQ to develop a draft permit, in accordance with Texas Health and Safety Code § 382.0515 and 30 Texas Administrative Code § 116.114(b)(1);
- F) Whether the permit application contains accurate and complete emissions estimates and air dispersion modeling;

G) Whether the draft permit requires adequate emission control technology, including applicable best available control technology, in accordance with Texas Health and Safety Code § 382.0518(b)(1);

H) Whether the draft permit contains adequate monitoring and recordkeeping requirements to demonstrate compliance with its terms;

I) Whether the draft permit's hours of operation are protective of human health; and

J) Whether the Applicant's compliance history warrants additional terms or conditions in the draft permit or denial of the permit in accordance with Texas Health and Safety Code § 382.0518(c) and Chapter 60 of the Commission's Rules.

Finally, the Commission specified that the maximum duration of the contested case hearing shall be 180 days from the date of the preliminary hearing until the proposal for decision is issued by SOAH.

NOW, THEREFORE, BE IT ORDERED BY THE TEXAS COMMISSION ON ENVIRONMENTAL QUALITY that:

- 1) The hearing requests by the North San Gabriel Alliance, Elizabeth Ann Friou, Suzanne Johnson, Patricia McCormick Mulvihill, Sandra Lee Thurman, Brittany Varner, Harold Wardlaw, Margaret Peggy McCormick Wardlaw, Shannon White-Shubert and Michael Shubert, and Haziell McCormick Williams are hereby GRANTED;
- 2) All other hearing requests and all requests for reconsideration are hereby DENIED;
- 3) The following issues are referred to SOAH for a contested case hearing on the application:
 - A) Whether the draft permit, including the maximum allowable emissions rates and chemical flexibility provisions, are protective of air quality, in accordance with Texas Health and Safety Code § 382.002;

- B) Whether the draft permit, including the maximum allowable emissions rates and chemical flexibility provisions, will be protective of the health of the requesters and their families, including sensitive subgroups in accordance with Texas Health and Safety Code §§ 382.002 and 382.0518(b)(2);
- C) Whether the draft permit, including the maximum allowable emissions rates and chemical flexibility provisions, are protective of animals and vegetation in accordance Texas Health and Safety Code § 382.002;
- D) Whether the draft permit is protective of the use and enjoyment of requesters' property, in accordance with 30 Texas Administrative Code § 101.4;
- E) Whether the application contains sufficient and accurate information for TCEQ to develop a draft permit, in accordance with Texas Health and Safety Code § 382.0515 and 30 Texas Administrative Code § 116.114(b)(1);
- F) Whether the permit application contains accurate and complete emissions estimates and air dispersion modeling;
- G) Whether the draft permit requires adequate emission control technology, including applicable best available control technology, in accordance with Texas Health and Safety Code § 382.0518(b)(1);
- H) Whether the draft permit contains adequate monitoring and recordkeeping requirements to demonstrate compliance with its terms;
- I) Whether the draft permit's hours of operation are protective of human health; and
- J) Whether the Applicant's compliance history warrants additional terms or conditions in the draft permit or denial of the permit in accordance with Texas Health and Safety Code § 382.0518(c) and Chapter 60 of the Commission's Rules.

- 4) All issues not identified as being referred to SOAH in Ordering Provision No. 3 are hereby DENIED;
- 5) The maximum duration of the hearing is set at 180 days from the date of the preliminary hearing until the date the proposal for decision is issued by SOAH; and
- 6) If any provision, sentence, clause, or phrase of this Order is for any reason held to be invalid, the invalidity of any portion shall not affect the validity of the remaining portions of the Order.

TEXAS COMMISSION ON
ENVIRONMENTAL QUALITY



Jon Njermann, Chairman

12/20/22

Date Signed