



Texas Commission on Environmental Quality

Waste Permits Division Correspondence

Cover Sheet

Date: September 04, 2025

Facility Name: BASF Agricultural Solutions US LLC

Permit or Registration No.: 50219

Nature of Correspondence:

☐ Initial/New

☒ Response/Revision to TCEQ Tracking No.:
31527001 (from subject line of TCEQ letter
regarding initial submission)

Affix this cover sheet to the front of your submission to the Waste Permits Division. Check appropriate box for type of correspondence. Contact WPD at (512) 239-2335 if you have questions regarding this form.

Table 1 - Municipal Solid Waste Correspondence

| Applications | Reports and Notifications |
|--|---|
| <input type="checkbox"/> New Notice of Intent | <input type="checkbox"/> Alternative Daily Cover Report |
| <input type="checkbox"/> Notice of Intent Revision | <input type="checkbox"/> Closure Report |
| <input type="checkbox"/> New Permit (including Subchapter T) | <input type="checkbox"/> Compost Report |
| <input type="checkbox"/> New Registration (including Subchapter T) | <input type="checkbox"/> Groundwater Alternate Source Demonstration |
| <input type="checkbox"/> Major Amendment | <input type="checkbox"/> Groundwater Corrective Action |
| <input type="checkbox"/> Minor Amendment | <input type="checkbox"/> Groundwater Monitoring Report |
| <input type="checkbox"/> Limited Scope Major Amendment | <input type="checkbox"/> Groundwater Background Evaluation |
| <input type="checkbox"/> Notice Modification | <input type="checkbox"/> Landfill Gas Corrective Action |
| <input type="checkbox"/> Non-Notice Modification | <input type="checkbox"/> Landfill Gas Monitoring |
| <input type="checkbox"/> Transfer/Name Change Modification | <input type="checkbox"/> Liner Evaluation Report |
| <input type="checkbox"/> Temporary Authorization | <input type="checkbox"/> Soil Boring Plan |
| <input type="checkbox"/> Voluntary Revocation | <input type="checkbox"/> Special Waste Request |
| <input type="checkbox"/> Subchapter T Disturbance Non-Enclosed Structure | <input type="checkbox"/> Other: |
| <input type="checkbox"/> Other: | |

Table 2 - Industrial & Hazardous Waste Correspondence

| Applications | Reports and Responses |
|--|---|
| <input type="checkbox"/> New | <input type="checkbox"/> Annual/Biennial Site Activity Report |
| <input checked="" type="checkbox"/> Renewal | <input type="checkbox"/> CPT Plan/Result |
| <input type="checkbox"/> Post-Closure Order | <input type="checkbox"/> Closure Certification/Report |
| <input type="checkbox"/> Major Amendment | <input type="checkbox"/> Construction Certification/Report |
| <input type="checkbox"/> Minor Amendment | <input type="checkbox"/> CPT Plan/Result |
| <input type="checkbox"/> CCR Registration | <input type="checkbox"/> Extension Request |
| <input type="checkbox"/> CCR Registration Major Amendment | <input type="checkbox"/> Groundwater Monitoring Report |
| <input type="checkbox"/> CCR Registration Minor Amendment | <input type="checkbox"/> Interim Status Change |
| <input type="checkbox"/> Class 3 Modification | <input type="checkbox"/> Interim Status Closure Plan |
| <input type="checkbox"/> Class 2 Modification | <input type="checkbox"/> Soil Core Monitoring Report |
| <input type="checkbox"/> Class 1 ED Modification | <input type="checkbox"/> Treatability Study |
| <input type="checkbox"/> Class 1 Modification | <input type="checkbox"/> Trial Burn Plan/Result |
| <input type="checkbox"/> Endorsement | <input type="checkbox"/> Unsaturated Zone Monitoring Report |
| <input type="checkbox"/> Temporary Authorization | <input type="checkbox"/> Waste Minimization Report |
| <input type="checkbox"/> Voluntary Revocation | <input type="checkbox"/> Other: |
| <input type="checkbox"/> 335.6 Notification | |
| <input checked="" type="checkbox"/> Other: Response to Technical NOD #1 | |

4 September 2025
GSI Job No. 10426

Vahab Haghighatian, Project Manager
Industrial and Hazardous Waste Permits Section
Waste Permits Division
TCEQ – Office of Waste, MC-130
P.O. Box 13087
Austin, Texas 78711

Via Email: Vahab.Haghighatian@Tceq.Texas.Gov

RE: Response to Technical Notice of Deficiency (NOD) 1 for the Hazardous Waste Permit Renewal Application for BASF Agricultural Solutions US LLC,
BASF Agricultural Solutions US LLC Facility, Beaumont, Texas.
Hazardous Waste Permit No. 50219; RN100634922 / CN600124895

Dear Mr. Haghighatian:

On behalf of BASF Agricultural Solutions US LLC (BASF), GSI Environmental Inc. is pleased to submit this response to the TCEQ Technical NOD 1 email issued on 21 August 2025.

This submittal includes an electronic version of the following:

- A table summarizing TCEQ's Technical NOD1 comments and BASF's responses;
- A redline/strikeout version identifying all proposed changes for the application pages; and
- Replacement pages (no redline/strikeout) for insertion into the application.

If you have any questions or comments regarding this response to the Technical NOD, please contact either Kendra Darrick of BASF at [REDACTED] or 409-249-8574 or Jim McDade at [REDACTED] or 832-721-6595.

Sincerely,



James M. McDade, P.E.
Vice President and Principal Engineer

cc (via email):

Ms. Kendra Derrick, BASF Agricultural Solutions US LLC
Ms. Caitlin Wilding, BASF Agricultural Solutions US LLC

Technical NOD 1 Response Hazardous Waste Permit Renewal Application

BASF Agricultural Solutions US LLC, Beaumont, Texas
Hazardous Waste Permit No. 50219

ATTACHMENTS

Attachment 1 – Table of Responses to Application Deficiencies - Technical NOD #1

Attachment 2 – Application Pages and Tables (Redlined)

Attachment 3 – Replacement Application Pages and Tables

**Technical NOD 1 Response
Hazardous Waste Permit Renewal Application**

BASF Agricultural Solutions US LLC, Beaumont, Texas
Hazardous Waste Permit No. 50219

**Attachment 1 – Table of Responses to
Application Deficiencies – Technical
NOD #1**

Application Deficiencies – Technical NOD 1

| ID ¹ | App. Part | App. Section | Location ^{1,2} | Citation | Error Type ³ | Deficiency Description/Resolution | BASF Response |
|-----------------|-----------|--------------|-------------------------|---|-------------------------|--|--|
| T1 | A | I | Section I | 30 TAC §305.64, Core Data Form & Application Instructions | Inconsistent | <ul style="list-style-type: none"> As discussed in the meeting on August 13, 2025, between IHW and BASF staff and the follow-up email from Ms. Kendra Derrick, revise Part A Section I to reflect the transfer of the facility owner and operator from BASF Corporation to BASF Agricultural Solutions US LLC as well as the facility contact information from Sheryl Kavetza to Kendra D Derrick. Replace the Core Data Form to reflect the above changes as appropriate. | The facility owner/operator and contact person have been updated in the Part A Application Form and Core Data Form. |
| T2 | B | I | Table I & I.1 | 30 TAC §305.64 & Application Instructions | Inconsistent | <ul style="list-style-type: none"> As discussed in the meeting on August 13, 2025, between IHW and BASF staff and the follow-up email from Ms. Kendra Derrick, revise Part B Tables I and I.1 to reflect the transfer of the facility owner and operator from BASF Corporation to BASF Agricultural Solutions US LLC as well as the facility contact information from Sheryl Kavetza to Kendra D. Derrick. | The facility owner/operator and contact person have been updated in Table I, and these changes have been added to Table I.1. |

| ID ¹ | App. Part | App. Section | Location ^{1,2} | Citation | Error Type ³ | Deficiency Description/Resolution | BASF Response |
|-----------------|-----------|--------------|---|--------------------------|-------------------------|---|---|
| T3 | A | II.B | Attachment B | Application Instructions | Format | <ul style="list-style-type: none"> The legal description provided is illegible. Please provide a legible version. | Attached to this response is the legal description of the property, with the relevant portions of the original typed out into an internal BASF document. |
| T4 | A | III.A | Table III-1 | Application Instructions | Inconsistent | <ul style="list-style-type: none"> The Part A permit application associated with the current permit lists several hazardous wastes which were previously managed in closed permitted units. For historical reasons, add these wastes to the table with a footnote indicating the wastes were managed in the closed permitted units. | Table III-1 has been updated to include the previous waste codes with a footnote that these are wastes previously managed in closed permitted units. |
| T5 | A | III.D | Process Flow Diagram/Description Table I.1 and V.C | Application Instructions | Inconsistent | <ul style="list-style-type: none"> The previously issued Class 2 permit modification included detailed description of the waste process flow which was not included in this application. Please revise the process flow diagram, as necessary. Revise the Process Flow Diagram to remove Tanks WB-501 & J-1765. These tanks are not currently permitted and are not included in Tables I.1. and V.C. Add Tank WB-1765 to the process flow diagram. | <p>The detailed description of the waste process flow was included with the April 2025 application as Attachment E.2. This description is similar to what was submitted as part of the 2018 and 2021 Class 2 permit modifications, with some information updates.</p> <p>Attachment E.1, waste flow diagram, has been updated to remove WB-501 and to change J-1765 to WB-1765. Note that J-1765 was labeled incorrectly on the previous version of Attachment E.1.</p> |

| ID ¹ | App. Part | App. Section | Location ^{1,2} | Citation | Error Type ³ | Deficiency Description/Resolution | BASF Response |
|-----------------|-----------|--------------|-------------------------|-------------------|-------------------------|--|--|
| T6 | B | IV | Appendix IV.D | 30 TAC §335.1(37) | Ambiguous | <ul style="list-style-type: none"> To justify that this facility does not receive waste on a commercial basis, BASF informed IHW in the pre-application meeting on September 10, 2024, and follow up email discussions with Ms. Derrick that Jayhawk produces a formulation for BASF using technology from BASF, and then Jayhawk sends ONLY the non-hazardous wastewater generated from this process back to BASF for disposal. BASF pays Jayhawk to formulate its product and assumes the disposal cost. If this situation is still the case, please revise the Waste Analysis Plan (WAP) accordingly. If the situation has changed, please provide information in support of BASF's position that its operation is non-commercial. Our understanding is also that BASF Beaumont facility receives nonhazardous waste from other BASF facilities. Please also revise the WAP accordingly. | As noted in Section 2.0 of the WAP, these additional off-site sources are listed. A note has been added in Section 2.0 to clarify the relationship between Jayhawk and BASF. |
| T7 | B | IV | Appendix IV.D | 40 CFR §264.13 | Omitted | <ul style="list-style-type: none"> Revise the WAP to describe procedures which will be used to inspect and, if necessary, analyze each waste movement received at the facility to determine whether it matches the identity of the waste specified on the accompanying manifest or shipping paper. | WAP is updated to include off-site non-hazardous wastes testing and verification procedures prior to acceptance at the site. |

| ID ¹ | App. Part | App. Section | Location ^{1,2} | Citation | Error Type ³ | Deficiency Description/Resolution | BASF Response |
|-----------------|-----------|--------------|---------------------------------|--------------------------|-------------------------|--|---|
| T8 | B | V | Table V.C | 40 CFR §270.16 | Incomplete | <ul style="list-style-type: none"> Table V.C is missing the unit measurement for Containment Volume. | Table V.C is updated with the corresponding unit (gallons) for Containment Volume. |
| T9 | B | V | Appendix A | 30 TAC §305.50(a)(7) | Incorrect | <ul style="list-style-type: none"> Revise the engineering certification from "...Hazardous Waste Permit Application issued 14 April 2025..." to "...Hazardous Waste Permit Application dated 14 March 2025 was submitted 14 April 2025...". | The Professional Engineer signature page has been updated to reflect this change. |
| T10 | B | VII | Tables VII.B, VII.B.1 & VII.E.1 | Application Instructions | Incorrect | <ul style="list-style-type: none"> The inflation factor for 2025 is not published until 2026. Relabel the closure costs from "2025 Dollars" to "2024 Dollars." | The costs are relabeled from "2025 Dollars" to "2024 Dollars" in Tables VII.B, VII.B.1, and VII.E.1. |
| T11 | B | VIII | Appendix VIII.A | Application Instructions | Inconsistent | <ul style="list-style-type: none"> Revise the financial assurance document to reflect the new owner or operator of the facility. For more information, please contact Mr. Mark Stoebner at [REDACTED] | A revised financial assurance mechanism (Letter of Credit) naming the new owner/operator, BASF Agricultural Solutions US LLC (BASF), is currently being drafted. BASF will provide the Letter of Credit prior to the November 1, 2025 name change. An email correspondence between BASF and TCEQ is attached for reference. |

¹ Deficiency ID - Key: A#=Administrative deficiency (ex. A12); T#=Technical deficiency relating to Sections I-X and Sections XII-XIII of the Part B application (ex. T10); C#=Comment only (ex. C1); CP#=Technical deficiency relating to Section XI-Compliance Plan of the Part B application (ex. CP14); Number in parenthesis (n) = nth instance of same deficiency (ex. T1(2) is the second instance of deficiency T1 originally identified in previous NOD).

² Location of deficiency in submittal/application. Items in square brackets [] refer to applicant's supplemental information submitted as attachments to the application form.

³ Possible Error Types: Ambiguous, Incomplete, Inconsistent, Incorrect, Omitted, Typo, or Format.

Technical NOD 1 Response Hazardous Waste Permit Renewal Application

BASF Agricultural Solutions US LLC, Beaumont, Texas
Hazardous Waste Permit No. 50219

Attachment 2 – Application Pages and Tables (Redlined)

Contents

- Part A Application Form
- Core Data Form
- Part B, Section I – Table I
- Part B, Section I – Table I.1
- Part A, Attachment E.1 and E.2 – Waste Flow Diagram
- Part B, Section IV – Appendix IV.D - Waste Analysis Plan
- Part B, Section V – Table V.C
- Part B, Section V – Appendix V.A
- Part B, Section VII – Tables VII.B, VII.B.1, and VII.E.1

**Technical NOD 1 Response
Hazardous Waste Permit Renewal Application**

BASF Agricultural Solutions US LLC, Beaumont, Texas
Hazardous Waste Permit No. 50219

Part A (Responses to T1 and T4)



**Texas Commission on Environmental Quality
Instructions and Procedural Information
for Filing a Permit Application for a
Hazardous Waste Storage, Processing, or Disposal Facility**

Part A

[Form Availability: This form, as well as other Industrial and Hazardous Waste documents, is available on the Internet World Wide Web, Industrial and Hazardous Waste home page at address https://www.tceq.texas.gov/permitting/waste_permits/ihw_permits]

General Instructions

1. A person (individual, corporation or other legal entity) who stores, processes or disposes of hazardous waste (except where such storage and/or processing is excluded from permit requirements in accordance with 30 Texas Administrative Code (TAC) Section 335.2) must obtain a permit pursuant to the Texas Health and Safety Code. In applying to the Texas Commission on Environmental Quality, hereafter referred to as the Commission, the applicant shall follow the procedures outlined below, on the application and in the Rules of the Commission.
2. The application (one original plus three (3) complete copies¹) should be mailed to:

Texas Commission on Environmental Quality
Attention: Waste Permits Division, MC126
P. O. Box 13087
Austin, Texas 78711-3087
3. Signature on Application [30 TAC 305.44]. The application shall be signed by the owner and operator or by a duly authorized agent, employee, officer, or representative of the owner or operator and shall be verified before a notary public. When another person signs on behalf of the owner and operator, this person's title or relationship to the owner or operator should be shown. In all cases, the person signing the form should be authorized to do so by the owner or operator (the Commission may require a person signing on behalf of an owner or operator to provide proof of authorization). An application submitted for a corporation must be signed by (or the signatory must be authorized by) a responsible corporate officer such as a president, secretary, treasurer, vice-president, or designated manager; or for a partnership or sole proprietorship, by a general partner or the proprietor, respectively. In the case of a municipal, state, federal, or other public facility, the application shall be signed by either a principal executive

¹ The third copy may optionally consist of paper copies of all plans and maps and a computer diskette of the remaining document. The document should be formatted in Word processing software up to and including version 6.1 or a 100% compatible format. Files may be compressed using PKZIP Ver. 2 or a 100% compatible program.

officer or ranking elected official.

4. An application will not be processed until all information required to properly evaluate the application has been obtained. When an application is severely lacking in detail and/or the applicant fails to submit additionally requested information in a timely manner, the application will not be considered to be "filed in accordance with the rules and regulations of the Commission."

Please submit any application revisions with a revised date and page numbers at the bottom of the page(s).

5. Fees and Costs

- a. The fee for filing an application is discussed in Section XII of Part B, form number TCEQ-0376.
 - b. The applicant for a permit is required to bear the cost of publication of notice of the application in a newspaper as prescribed by 30 TAC Section 39.405(f).
6. A person may not commence operation of a hazardous waste management facility until the Commission has issued a permit to authorize the storage, processing, or disposal of hazardous waste, except with the approval of the Commission.

7. Designation of Material as Confidential

The designation of material as confidential is frequently carried to excess. The Commission has a responsibility to provide a copy of each application to other review agencies and to interested persons upon request and to safeguard confidential material from becoming public knowledge. Thus, the Commission requests that the applicant (1) be prudent in the designation of material as confidential and (2) submit such material only when it might be essential to the staff in their development of a recommendation.

The Commission suggests that the applicant NOT submit confidential information as part of the permit application. However, if this cannot be avoided, the confidential information should be described in non-confidential terms throughout the application, and submitted as a document or binder, and conspicuously marked "CONFIDENTIAL."

Reasons of confidentiality include the concept of trade secrecy and other related legal concepts which give a business the right to preserve confidentiality of business information to obtain or retain advantages from its right in the information. This includes authorizations under 18 U.S.C. 1905 and special rules cited in 40 CFR Chapter I, Part 2, Subpart B.

Section 361.037 of the Texas Health and Safety Code does not allow an applicant for an industrial and hazardous waste permit to claim as confidential any record pertaining to the characteristics of the industrial solid waste.

The applicant may elect to withdraw any confidential material submitted with the application. However, the permit cannot be issued, amended, or modified if the application is incomplete.

Part II

Procedural Information

After the submittal of Parts A and B of the application, the TCEQ will provide public notice of receipt of the application. The Executive Director's staff will review the application for completeness of information submitted. During the review, the applicant may be contacted for clarification or additional information. When all pertinent information is present, the application or a summary of its contents will be forwarded for review by other state agencies and local governmental entities interested in water quality control and solid waste management. After technical evaluation, opportunity for public hearing will be afforded.

Note that for facilities which had "commenced on-site storage, processing, or disposal of hazardous waste" [see 30 TAC Section 335.43(b)] on or before the date such waste is identified or listed as hazardous by EPA, the Texas Health and Safety Code provides in Section 361.082(f) that these facilities may continue to manage hazardous waste until such time as the Commission approves or denies the application, provided that the applicant has filed the permit application in accordance with the rules and regulations of the Commission.

The Commission may act upon an application for a permit, permit amendment, permit modification, or renewal of a permit without the necessity of holding a public hearing:

1. (a) When notice of the application has been mailed to persons possibly affected by the proposed permit; and

(b) When notice has been published at least once in a newspaper regularly published or circulated within each county where the proposed facility is located; and

(c) Within forty-five (45) days following publication of the Commission's notice, a Commissioner, the Executive Director or an affected person has not requested a public hearing; or
2. For a Class 1 or a Class 2 permit modification or a minor amendment to a permit. The Commission may, in certain cases, hold a public hearing for a Class 2 permit modification or a minor amendment.

A public hearing may be scheduled on an application for a RCRA hazardous waste permit when requested by a Commissioner, the Executive Director, or an affected person within forty-five (45) days following the newspaper publication.

Requirements of Giving Notice of the Application:

1. By the Applicant: Every applicant for a permit, permit amendment, permit modification, or permit renewal shall publish notice (see note below) of the application at least once in a newspaper regularly published or circulated within each county where the proposed facility is located. Where a public hearing has been requested, notice will be mailed to the applicant in ample time for publication, which shall be not less than thirty (30) days prior to the date set for the hearing. Except in the case of a notice of a permit modification request, the Commission will mail the appropriate notice and instructions for publication to the applicant.

NOTE: Additional publication and direct mail notice to affected persons will result if a public hearing is requested following newspaper publication of the notice of application. The cost of providing this additionally required publication and service of notice to affected persons will be assumed by the applicant.

2. By the Texas Commission on Environmental Quality: The Commission will mail notice of

the application (except for permit modifications) to affected persons and certain governmental entities. The notice will be mailed at the same time instructions for newspaper publications are mailed to the applicant.

3. Bilingual Notice Instructions:

For certain permit applications, public notice in an alternate language is required. If an elementary school or middle school nearest to the facility offers a bilingual program, notice may be required to be published in an alternative language. The Texas Education Code, upon which the TCEQ alternative language notice requirements are based, requires a bilingual education program for an entire school district should the requisite alternative language speaking student population exist. However, there may not be any bilingual-speaking students at a particular school within a district which is required to offer the bilingual education program. For this reason, the requirement to publish notice in an alternative language is triggered if the nearest elementary or middle school, as part of a larger school district, is required to make a bilingual education program available to qualifying students and either the school has students enrolled at such a program on-site, or has students who attend such a program at another location to satisfy the school's obligation to provide such a program.

If it is determined that a bilingual notice is required, the applicant is responsible for ensuring that the publication in the alternate language is complete and accurate in that language. Electronic versions of the Spanish template examples are available from the TCEQ to help the applicant complete the publication in the alternative language.

Bilingual Notice Application Form:

Bilingual notice confirmation for this application:

1. Is the school district of the elementary or middle school nearest to the facility required by the Texas Education Code to have a bilingual program?

☒ YES ☐ NO

(If NO, alternative language notice publication not required)

2. If YES to question 1, are students enrolled in a bilingual education program at either the elementary school or the middle school nearest to the facility?

☒ YES ☐ NO

(If YES to questions 1 and 2, alternative language publication is required; If NO to question 2, then consider the next question)

3. If YES to question 1, are there students enrolled at either the elementary school or the middle school nearest to the facility who attend a bilingual education program at another location?

☒ YES ☐ NO

(If Yes to questions 1 and 3, alternative language publication is required; If NO to question 3, then consider the next question)

4. If YES to question 1, would either the elementary school or the middle school nearest to the facility be required to provide a bilingual education program but for the fact that it secured a waiver from this requirement, as available under 19 TAC 89.1205(g)?

☒ YES ☐ NO

(If Yes to questions 1 and 4, alternative language publication is required; If NO to question 4, alternative language notice publication not required)

If a bilingual education program(s) is provided by either the elementary school or the middle school nearest to the facility, which language(s) is required by the bilingual program? Spanish

Consideration of the Permit Application by the Commission:

The applicant will be notified by the Commission when the application is set for final consideration. If the Commission issues the permit, the applicant will be mailed a copy of the permit by the TCEQ Office of the Chief Clerk within one (1) month following Commission approval. (NOTE: Only one copy is mailed to the applicant and that copy will be sent to the official mailing address of the applicant as shown on the permit application form.)

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Texas Commission on Environmental Quality
Permit Application for a Hazardous Waste Storage/Processing/Disposal Facility
Part A - Facility Background Information

I. General Information

A. Facility Name: **BASF Agricultural Solutions US LLC**

Deleted: Corporation

(Individual, Corporation, or Other Legal Entity Name)

TCEQ Solid Waste Registration No: **30053** EPA I.D. No.: **TXD067261412**

Street Address (If Available): **14385 West Port Arthur Road**

City: **Beaumont**, State: **TX** Zip Code: **77705**

County: **Jefferson**

Telephone Number: **409-981-5052** Charter Number: **803002582**

Deleted: 4205406

Deleted: _____

If the application is submitted on behalf of a corporation, please identify the Charter Number as recorded with the Office of the Secretary of State for Texas.

B. Facility Contact

1. List those persons or firms who will act as primary contact for the applicant during the processing of the permit application. Also indicate the capacity in which each person may represent the applicant (engineering, legal, etc.). The person listed first will be the primary recipient of correspondence regarding this application. Include the complete mailing addresses and phone numbers.

Brenda Neely - Site Director
BASF Agricultural Solutions US LLC
14385 West Port Arthur Road
Beaumont, TX 77705
Phone: 409-981-5139
Email: [REDACTED]

Kendra Derrick - EHS Specialist
BASF Agricultural Solutions US LLC
14385 West Port Arthur Road
Beaumont, TX 77705
Phone: 409-249-8574
Email: [REDACTED]

Deleted: Sheryl Kavetza

Formatted: Indent: Left: 1"

Deleted: Corporation

Deleted:

Deleted: Corporation

Formatted: Indent: Left: 1", Hanging: 0.25"

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Deleted: 513

Deleted: 675

Deleted: 4908

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2. If the application is submitted by a corporation or by a person residing out of state, the applicant must register an Agent in Service or Agent of Service with the Texas Secretary of State's office and provide a complete mailing address for the agent. The agent must be a Texas resident.

C.T. Corporation
1999 Bryan Street, Suite 900
Dallas, TX 75201-3136
214-979-1172

C. Operator²: Identify the entity who will conduct facility operations.

Operator Name: **BASF Agricultural Solutions US LLC**

Deleted: Corporation

Address: **2 TW Alexander Drive**

Deleted: 100 Campus Drive

² The operator has the duty to submit an application if the facility is owned by one person and operated by another [30 TAC 305.43(b)]. The permit will specify the operator and the owner who is listed on this application [Section 361.087 Texas Health and Safety Code].

City: Research Triangle Park, State: NC Zip Code: 27713

Telephone Number: 984-287-2800 Charter Number: 803002582

D. Owner

1. Indicate the ownership status of the facility:

a. Private ☒ X

- (1) ☒ X Corporation
(2) _____ Partnership
(3) _____ Proprietorship
(4) _____ Non-profit organization

b. Public _____

- (1) _____ Federal
(2) _____ Military
(3) _____ State
(4) _____ Regional
(5) _____ County
(6) _____ Municipal
(7) _____ Other (specify)

2. Does the operator own the facility units and facility property?

☒ Yes ☐ No

If you checked "no",

- a. Submit as "Attachment A" a copy of the lease for use of or the option to buy said facility units and/or facility property, as appropriate; and
b. Identify the facility units' owner(s) and/or facility property owner(s). Please note that the owner(s) is/are required to sign the application on page 5.

Owner Name: BASF Agricultural Solutions US LLC

Address: 2 TW Alexander Drive

City: Research Triangle Park, State: NC Zip Code: 27713

Telephone Number: 984-287-2800

Owner Name: _____

Address: _____

City: _____, State: _____ Zip Code: _____

Telephone Number: _____

Deleted: Florham Park

Deleted: J

Deleted: 07932

Deleted: 973

Deleted: 245

Deleted: 6000

Deleted: 4205406

Deleted: Corporation

Deleted: 100 Campus Drive

Deleted: Florham

Deleted: J

Deleted: 07932

Deleted: 973-245-6000

E. Type of Application Submittal:

Initial _____ or Revision **X (Renewal Application)**

F. Registration and Permit Information

Indicate (by listing the permit number(s) in the right-hand column below) all existing or pending State and/or Federal permits or construction approvals which pertain to pollution control or industrial solid waste management activities conducted by your plant or at your location. Complete each blank by entering the *permit number*, or the *date of application*, or "none".

| Relevant Program and/or Law | Permit No. | Agency* |
|--|---|---------------------|
| 1. Texas Solid Waste Disposal Act | SWR 30053 | TCEQ |
| 2. Wastewater disposal under the Texas Water Code | WQ0001169000 | TCEQ |
| 3. Underground injection under the Texas Water Code | WDW-155, WDW-201 WDW-301, WDW-302 WDW-433, WDW-434 PIU-30053 | TCEQ |
| 4. Texas Clean Air Act | 20057, 978B, 113174, 151935, 152562, 157151, 157585, 158173, 158481, 164582, 173963, JE0113D | TCEQ |
| 5. Texas Uranium Surface Mining & Reclamation Act | None | |
| 6. Texas Surface Coal Mining & Reclamation Act | None | |
| 7. Hazardous Waste Management program under the Resource Conservation and Recovery Act | 50219 TXD067261412 | TCEQ EPA |
| 8. UIC program under the Safe Drinking Water Act | None | |
| 9. TPDES program under the Clean Water Act | TX0003671 | EPA |
| 10. PSD program under the Clean Air Act | None | |
| 11. Nonattainment program under the Clean Air Act | None | |
| 12. National Emission Standards for Hazardous Pollutants (NESHAP) Pre-construction | None | |

approval under the Clean Air Act

- | | |
|--|-------------|
| 13. Ocean dumping permits under the Marine Protection Research and Sanctuaries Act | None |
| 14. Dredge or fill permits under section 404 of the Clean Water Act | None |
| 15. Other relevant environmental permits | None |

*Use the following acronyms for each agency as shown below:

| | |
|-------|---|
| TCEQ | = Texas Commission on Environmental Quality |
| TRC | = Texas Railroad Commission |
| TDH | = Texas Department of Health |
| TDA | = Texas Department of Agriculture |
| EPA | = U.S. Environmental Protection Agency |
| CORPS | = U.S. Army Corps of Engineers |

G. Give a brief description of the nature of your business.

Manufacture of agricultural chemicals.

H. TCEQ Core Data Form

The TCEQ requires that a Core Data Form (Form 10400) be submitted on all incoming applications. For more information regarding the Core Data Form, call (512) 239-1575 or go to the TCEQ website at http://www.tceq.texas.gov/permitting/central_registry/guidance.html.

See Attachment 1 – Core Data Form

Signature Page

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Operator Signature: _____ Date: _____

Name and Official Title (type or print): **Brenda L Neely, Site Director**

Operator Signature: _____ Date: _____

Name and Official Title (type or print): _____

Operator Signature: _____ Date: _____

Name and Official Title (type or print): _____

Owner Signature: _____ Date: _____

Name and Official Title (type or print): _____

To be completed by the operator if the application is signed by an authorized representative for the operator

I, _____ hereby designate _____
(operator) (authorized representative)

as my representative and hereby authorize said representative to sign any application, submit additional information as may be requested by the Commission; and/or appear for me at any hearing or before the Texas Commission on Environmental Quality in conjunction with this request for a Texas Water Code or Texas Solid Waste Disposal Act permit. I further understand that I am responsible for the contents of this application, for oral statements given by my authorized representative support of the application, and for compliance with the terms and conditions of any permit which might be issued based upon this application.

Printed or Typed Name of Operator or Principal Executive Officer

Signature

(Note: Application Must Bear Signature & Seal of Notary Public)

Subscribed and sworn to before me by the said **Brenda L Neely** on this

_____ day of _____, _____.

My commission expires of the _____ day of _____, _____

Notary Public in and for _____ County, Texas

II. Facility Background Information

A. Location of Facility for which the application is submitted

1. Give a description of the location of the facility site with respect to known or easily identifiable landmarks.

Approximately two miles (straight distance) northwest of the Jefferson County Airport on West Port Arthur Road.

2. Detail the access routes from the nearest U.S. or State Highway to the facility.

Entry to the facility is off of the west side of West Port Arthur Road approximately 2.5 miles north of the intersection of Highway 365 and West Port Arthur Road.

3. Enter the geographical coordinates of the facility:

Latitude: 29 deg 58 min 18 sec

Longitude: 94 deg 03 min 13 sec

4. Is the facility located on Indian lands?

☐ Yes ☒ No

B. Legal Description of Facility

Submit as "Attachment B" a legal description(s) of the tract or tracts of land upon which the waste management operations referred to in this permit application occur or will occur. Although a legal description is required, a metes and bounds description is not necessary for urban sites with appropriate "lot" description(s). A survey plat or facility plan drawing which shows the specific points referenced in the survey should also be included in Attachment B.

See Attachment B

C. SIC Codes

List, in descending order of significance, the four digit standard industrial classification (SIC) codes which best describe your facility in terms of the principal products or services you produce or provide. Also, specify each classification in words. These classifications may differ from the SIC codes describing the operation generating the hazardous wastes.

| 4-digit SIC Code | Description |
|------------------|---------------------------------------|
| 2869 | Industrial Organic Chemicals |
| 2879 | Pesticides and Agricultural Chemicals |
| | |
| | |

SIC code numbers are descriptions which may be found in the Standard Industrial Classification Manual prepared by the Executive Officer of the President, Office of Management and Budget, which is available from the Government Printing Office, Washington, D.C. Use the current edition of the manual.

III. Wastes and Waste Management

A. Waste Generation and Management Activities

Is any hazardous waste [see Title 40, Code of Federal Regulations (CFR), Part 261] presently or proposed to be generated or received at your facility?

☒ Yes ☐ No

If no, skip to question Number 2 below.

If yes, answer the following question.

1. Are you presently registered with TCEQ as a solid waste generator?

☒ Yes ☐ No ☐ Pending

If no, contact the Industrial and Hazardous Waste Division of TCEQ in Austin, Texas to obtain registration information. Also, continue with the application form (go to Number 2 below).

If yes, go to Section I of your TCEQ Notice of Registration, determine which of your wastes are hazardous, and list these wastes (and mixtures) in Table III-1 (see Number 2 below).

2. Complete Table III-1, Hazardous Wastes and Management Activities, below, listing all hazardous wastes, all mixtures containing any hazardous wastes, and hazardous debris which were, are presently, or are proposed to be handled at your facility in interim status or permitted units. See 40 CFR 261 and 268.2, attaching additional copies as necessary.

Note that Table III-1 includes only the waste codes for the wastes managed in the existing and active permitted tanks listed in Table III-2. The facility manages other hazardous and non-hazardous wastes as listed on the facility's Notice of Registration; however, hazardous wastes are only managed in permit-exempt units and not in permitted units. Note that the existing and active permitted tanks listed in Table III-2 only manage non-hazardous wastes.

Guidelines for the Classification & Coding of Industrial Wastes and Hazardous Wastes, TCEQ publication RG-22, contains guidance on how to properly classify and code industrial waste and hazardous waste in accordance with 30 TAC 335.501-335.515 (Subchapter R).

If you are not registered with TCEQ, enter "NA" for TCEQ Waste Code Number.

For the EPA Hazardous Waste Numbers, see 40 CFR 261.20-33. For annual quantity, provide the amount in units of pounds (as generated and/or received) for each waste and/or waste mixture.

B. Waste Management Units Summary

1. For each waste and waste mixture listed in Table III-1 that is stored, processed, and/or disposed on-site (except where such storage and/or processing is excluded from permit requirements in accordance with Texas Administrative Code (TAC) Section 335), complete Table III-2, Hazardous

Waste Management Unit Checklist, and enter the name of each hazardous waste management unit (Note: Please make copies of Table III-2 if necessary).

Give the design capacity of each hazardous waste management unit in any of the units of measure shown. In the case of inactive or closed units for which design details are unavailable, an estimate of the design capacity is sufficient.

Please provide a description for each waste management unit described in your own words on the line provided for "Waste Management Unit."

2. Has the applicant at any time conducted the on-site disposal of industrial solid waste now identified or listed as hazardous waste?

☐ Yes ☒ No

If yes, complete Table III-2 indicating the hazardous waste management units which were once utilized at your plant site but are no longer in service (i.e., inactive or closed facility units).

If no, and if no hazardous waste is presently or proposed to be stored [for longer than 90 days (see 30 TAC Section 335.53)], processed, or disposed of at your facility, then you need not file this permit application. Otherwise proceed with the application form.

3. Provide an estimate of the total weight (lbs) of hazardous waste material that has been disposed of and/or stored within your site boundaries and not removed to another site.

C. Location of Waste Management Units

1. Submit as "Attachment C" a drawn-to-scale topographic map (or other map if a topographic map is unavailable) extending one mile beyond the facility boundaries, depicting the following:
 - a. The approximate boundaries of the facility (described in Section II.B) and within these boundaries, the location and boundaries of the areas occupied by each active, inactive, and proposed hazardous waste management unit (see Table III-2). Each depicted area should be labeled to identify the unit(s), unit status (i.e., active, inactive, or proposed), and areal size in acres.
 - b. The overall facility and all surface intake and discharge structures;
 - c. All on-site injection wells where liquids are injected underground;
 - d. All known monitor wells and boreholes within the property boundaries of the facility; and
 - e. All wells, springs, other surface water bodies, and drinking water wells listed in public records or otherwise known to the applicant within the map area and the purpose for which each water well is used (e.g., domestic, livestock, agricultural, industrial, etc.).
2. Submit as "Attachment D" photographs which clearly delineate all hazardous waste management storage, processing, and disposal units, as well as sites of future storage, processing and disposal units.

D. Flow Diagram/Description

Show as "Attachment E" process flow diagrams and step-by-step word descriptions of the process flow, depicting the handling, collection, storage, processing, and/or disposal of each of the hazardous wastes previously listed in this application.

The flow diagrams or descriptions should include the following information:

1. Originating point of each waste and waste classification code;
2. Means of conveyance utilized in every step of the process flow;
3. Name and function of each facility component through which the waste passes;
4. The ultimate disposition of all wastes (if off-site, specify "off-site") and waste residues.

IV. Index Of Attachments

List and index below all attachments to this application and indicate if included or not included:

| Item | Attachments | Attachment | Included | Not Included |
|---------|---|------------|----------|--------------|
| I.D.2.a | Lease/Option to buy | A | | X |
| II.B | Site legal description | B | X | |
| III.C.1 | Facility boundaries and adjacent waters map | C | X | |
| III.C.2 | Photographs | D | X | |
| III.D | Process flow diagram/description | E | X | |

Table III-1 – Hazardous Wastes and Management Activities

| Verbal Description of Waste | TCEQ Waste for Code and Classification Code | EPA Hazardous Waste Number | Storage ¹ of Wastes Received from Off-Site | Processing ² of Wastes Received from Off-Site | Disposal of Wastes Received from Off-Site | Storage ¹ of Wastes Generated On-Site | Processing ² of Wastes Generated On-Site | Disposal of Wastes Generated On-Site | Annual Quantity Generated and/or Received |
|--|---|---|---|--|---|--|---|--------------------------------------|---|
| DMTA Unit Wastewater | 20002071 | NA | | | | X | X | X | <1000 T |
| Wastewater from Dicamba processing unit | 70011011 | NA | | X | | X | X | X | <1000 T |
| Wastes below were previously managed in closed permitted units.³ | | | | | | | | | |
| Acute Lab Packs | 0001004H | D001, D001, P005, P024, P030, P106, P119, P120 | | | | X | | | <0.1 T |
| Contaminated Xylene-DCP Process Stream | 1004203H | D001, F003 | | | | X | | | <1000 T |
| Methanol and TCB | 1004203H | D001 | | | | X | | | <1000 T |
| Flammable mixture containing DEK, Methanol, MEK, HMP, Propanic Acid | 2001203H | D035, D001 | | | | X | | | 0 |
| MPP Lab Waste | 2020201H | D001, F003, F005 | | | | X | | | 0 |
| MPP Organic Waste | 3025201H | D001, D002, D003, F003, F005 | | | | X | | | 0 |

¹ "Storage" means the holding of solid waste for a temporary period, at the end of which the waste is processed, disposed of, or stored elsewhere.

² "Processing" means the extraction of materials, transfer, volume reduction, conversion to energy, or other separation and preparation of solid waste for reuse or disposal, including the treatment or neutralization of hazardous waste, designed to change the physical, chemical, or biological character or composition of any hazardous waste so as to neutralize such waste, or so as to recover energy or material from the waste or so as to render such waste non-hazardous or less hazardous; safer for transport, store or dispose of; or amenable for recovery, amenable for storage, or reduced in volume. The "transfer" of solid waste for reuse or disposal as used above, does not include the actions of a transporter in conveying or transporting solid waste by truck, ship, pipeline, or other means. Unless the Executive Director determines that regulation of such activity is necessary to protect human health or the environment, the definition of "processing" does not include activities relating to those materials exempted by the Resource Conservation and Recovery Act, 42 U.S.C. 6901 et seq., as amended.

³ ~~Wastes listed were previously managed in closed permitted units.~~

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| Verbal Description of Waste | TCEQ Waste for Code and Classification Code | EPA Hazardous Waste Number | Storage ¹ of Wastes Received from Off-Site | Processing ² of Wastes Received from Off-Site | Disposal of Wastes Received from Off-Site | Storage ¹ of Wastes Generated On-Site | Processing ² of Wastes Generated On-Site | Disposal of Wastes Generated On-Site | Annual Quantity Generated and/or Received |
|---|---|--|---|--|---|--|---|--------------------------------------|---|
| <u>Toluene Contaminated Absorbents</u> | <u>3027403H</u> | <u>F005, U161, U220</u> | | | | <u>X</u> | | | <u>0</u> |
| <u>Waste Corrosive Chemicals</u> | <u>4001105H</u> | <u>D002</u> | | | | <u>X</u> | | | <u><1 T</u> |
| <u>Frontier Liquid Organic Waste</u> | <u>5001219H</u> | <u>D001, U122</u> | | | | <u>X</u> | | | <u>0</u> |
| <u>HMP/DMTA Tars Lab Packs</u> | <u>5010219H</u> <u>6012003H</u> | <u>D001</u> <u>D001, D002, D003, D008, D018, U001, U188</u> | | | | <u>X</u> <u>X</u> | | | <u>0</u> <u><1 T</u> |
| <u>Sample Waste (lab analytical waste)</u> | <u>6027201H</u> | <u>D001, D002, D018, D022, F003, F005</u> | | | | <u>X</u> | | | <u><1 T</u> |
| <u>Flammable Liquids, including haz. Tank bottoms</u> | <u>9036219H</u> | <u>D001, D018, F003, F005</u> | | | | <u>X</u> | <u>X</u> | | <u><100 T</u> |
| <u>Other Waste Inorganic Solids</u> | <u>9037319H</u> | <u>D009</u> | | | | <u>X</u> | | | <u><0.1 T</u> |
| <u>Elemental Mercury</u> | <u>9042319H</u> | <u>D009</u> | | | | <u>X</u> | | | <u><0.1 T</u> |
| <u>Out-Dated Chemicals</u> | <u>9045203H</u> | <u>D001</u> | | | | <u>X</u> | | | <u><0.1 T</u> |
| <u>Waste Gas Cylinders</u> | <u>9046801H</u> | <u>D001</u> | | | | <u>X</u> | | | <u><0.1 T</u> |
| <u>Aerosols</u> | <u>9047219H</u> | <u>D001, D003</u> | | | | <u>X</u> | | | <u><1000 T</u> |
| <u>Old Akzo Nobel C5809</u> | <u>9048219H</u> | <u>D001</u> | | | | <u>X</u> | | | <u><0.1 T</u> |
| <u>MPP Organic Wastewater</u> | <u>9063219H</u> | <u>D001</u> | | | | <u>X</u> | | | <u>0</u> |
| <u>Hydrogen Peroxide</u> | <u>9096105H</u> | <u>D001, D002</u> | | | | <u>X</u> | | | <u><0.1 T</u> |
| <u>Thionic waste from DMTA Unit</u> | <u>9087204H</u> | <u>D001</u> | | | | <u>X</u> | | | <u><100 T</u> |
| <u>Waste Dimethylamine</u> | <u>9121219H</u> | <u>D001, D002</u> | | | | <u>X</u> | | | <u><100 T</u> |
| <u>Waste Neutral Oils</u> | <u>9125609H</u> | <u>D001, D002</u> | | | | <u>X</u> | | | <u><10 T</u> |
| <u>Hazardous DCP Production Waste</u> | <u>9128208H</u> | <u>D041, D042</u> | | | | <u>X</u> | | | <u><2000 T</u> |

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| Verbal Description of Waste | TCEQ Waste for Code and Classification Code | EPA Hazardous Waste Number | Storage ¹ of Wastes Received from Off-Site | Processing ² of Wastes Received from Off-Site | Disposal of Wastes Received from Off-Site | Storage ¹ of Wastes Generated On-Site | Processing ² of Wastes Generated On-Site | Disposal of Wastes Generated On-Site | Annual Quantity Generated and/or Received |
|--|---|--------------------------------|---|--|---|--|---|--------------------------------------|---|
| <u>Hazardous Contaminated Soil from Spill Cleanup</u> | <u>9129409H</u> | <u>D018</u> | | | | <u>X</u> | | | <u><100 T</u> |
| <u>Waste Diesel Material</u> | <u>9156219H</u> | <u>D001</u> | | | | <u>X</u> | | | <u><10 T</u> |
| <u>MPP and DMTA High TDS Wastewater</u> | <u>113H</u> | <u>D001, D002, F003, F005</u> | | | | <u>X</u> | | | <u><1000 T</u> |
| <u>DMTA and Dicamba Acidic Wastewater</u> | <u>105H</u> | <u>D001, D002</u> | | | | <u>X</u> | | | <u><1000 T</u> |
| <u>DCP Isomers</u> | <u>1001208H</u> | <u>U081</u> | | | | <u>X (inactive)</u> | <u>X (inactive)</u> | | <u>0</u> |
| <u>Heptane/Dienochlor Organic Waste</u> | <u>2017219H</u> | <u>D001, U130</u> | | | | <u>X (inactive)</u> | | | <u>0</u> |
| <u>Chlorinated Acrylonitrile Waste</u> | <u>2018219H</u> | <u>D001, U009</u> | | | | <u>X (inactive)</u> | | | <u>0</u> |
| <u>Aqueous Waste with Cyanides</u> | <u>2019102H</u> | <u>D003</u> | | | | <u>X (inactive)</u> | | | <u>0</u> |
| <u>Discarded Chemicals</u> | <u>2021207H</u> | <u>D001, D002</u> | | | | <u>X (inactive)</u> | | | <u>0</u> |
| <u>Toluene</u> | <u>2023203H</u> | <u>D001, U220</u> | | | | <u>X (inactive)</u> | | | <u>0</u> |
| <u>Sulfuric Acid</u> | <u>3001104H</u> | <u>D002</u> | | | | <u>X (inactive)</u> | | | <u>0</u> |
| <u>Solvent Mixture Contaminated with Pesticides & Herbicides</u> | <u>3026204H</u> | <u>D001, D002, U220</u> | | | | <u>X (inactive)</u> | | | <u>0</u> |
| <u>Organic Mixture from MPP Line Clean Out</u> | <u>3034219H</u> | <u>D001</u> | | | | <u>X (inactive)</u> | | | <u>0</u> |
| <u>Methyl Tert Butyl Ether and Methanol</u> | <u>3039219H</u> | <u>D001</u> | | | | <u>X (inactive)</u> | | | <u>0</u> |
| <u>Fiber Filters Containing Hydrazinehydrate</u> | <u>3040405H</u> | <u>D002, D003</u> | | | | <u>X (inactive)</u> | | | <u>0</u> |
| <u>Used Hydrazine Hydrate Solution</u> | <u>3041119H</u> | <u>D002, U133</u> | | | | <u>X (inactive)</u> | | | <u>0</u> |
| <u>MPP Filter Socks</u> | <u>3042108H</u> | <u>D002</u> | | | | <u>X (inactive)</u> | | | <u>0</u> |
| <u>Contaminated Water</u> | <u>4002102H</u> | <u>D035, F003, F005, U002,</u> | | | | <u>X (inactive)</u> | <u>X (inactive)</u> | | <u>0</u> |

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| Verbal Description of Waste | TCEQ Waste for Code and Classification Code | EPA Hazardous Waste Number | Storage ¹ of Wastes Received from Off-Site | Processing ² of Wastes Received from Off-Site | Disposal of Wastes Received from Off-Site | Storage ¹ of Wastes Generated On-Site | Processing ² of Wastes Generated On-Site | Disposal of Wastes Generated On-Site | Annual Quantity Generated and/or Received |
|--|---|---|---|--|---|--|---|--------------------------------------|---|
| | | <u>U081, U159, U220, U226, U239</u> | | | | | | | |
| <u>HMK Waste</u> | <u>5002219H</u> | <u>D001</u> | | | | <u>X (inactive)</u> | | | <u>0</u> |
| <u>Storage Tank Rinse Water</u> | <u>5009219H</u> | <u>D018</u> | | | | <u>X (inactive)</u> | | | <u>0</u> |
| <u>Treatment Chemicals</u> | <u>7009110H</u> | <u>D001, D002</u> | | | | <u>X (inactive)</u> | | | <u>0</u> |
| <u>Paint Thinner or Petroleum Distillates</u> | <u>8013211H</u> | <u>D001, D035, F003, F005</u> | | | | <u>X (inactive)</u> | | | <u>0</u> |
| <u>Non-Halogenated Solvents</u> | <u>8036203H</u> | <u>D001</u> | | | | <u>X (inactive)</u> | | | <u>0</u> |
| <u>Paint - Ink Remover</u> | <u>8038112H</u> | <u>D007</u> | | | | <u>X (inactive)</u> | | | <u>0</u> |
| <u>Halogenated/Non-Halogenated Solvent Mixture</u> | <u>9023204H</u> | <u>D001, D035, F003, F005, U154, U220, U239</u> | | | | <u>X (inactive)</u> | | | <u>0</u> |
| <u>Off-Spec Herbicide Product</u> | <u>9040402H</u> | <u>U240</u> | | | | <u>X (inactive)</u> | | | <u>0</u> |
| <u>Concrete Piping Debris</u> | <u>9041319H</u> | <u>D009</u> | | | | <u>X (inactive)</u> | | | <u>0</u> |
| <u>Out Dated Tetra Methoxypropane</u> | <u>9044203H</u> | <u>D001</u> | | | | <u>X (inactive)</u> | | | <u>0</u> |
| <u>DMA Waste</u> | <u>9052219H</u> | <u>D001, D002</u> | | | | <u>X (inactive)</u> | | | <u>0</u> |

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Table III-2 – Hazardous Waste Management Unit Checklist

| Waste Management Unit | TCEQ N.O.R. Unit # | Status ¹ | Design Capacity ² | Number of Years Utilized | Date in Service |
|----------------------------|--------------------|---------------------|------------------------------|--------------------------|-----------------|
| Tank J-516 | 032 | Closed | 20,000 gallons | 13 | 1990 to 2003 |
| Tank J-519 | 033 | Closed | 6,000 gallons | 10 | 1993 to 2003 |
| Tank B-521 | 034 | Closed | 2,000 gallons | 13 | 1990 to 2003 |
| Tank B-503 | 035 | Closed | 1,000 gallons | 13 | 1990 to 2003 |
| Thermal Process Unit H-507 | 036 | Closed | 15 x 10 ⁶ BTUs/hr | 13 | 1990 to 2003 |
| Tank F-414A | 042 | Active ³ | 196,202 gallons | 35 | 1990 to present |
| Tank WB-1767 | 061 | Active ³ | 150,000 gallons | 35 | 1990 to present |
| Tank F-414B | 042 | Active ³ | 197,000 gallons | 35 | 1990 to present |
| Tank F-414C | 069 | Active ³ | 197,000 gallons | 35 | 1990 to present |
| Tank WB-502A | 073 | Active ³ | 1,000,000 gallons | 35 | 1990 to present |
| Tank WB-502B | 074 | Active ³ | 1,000,000 gallons | 35 | 1990 to present |
| Tank WB-1765 | 071 | Active ³ | 1,000,000 gallons | 35 | 1990 to present |
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¹ Indicate only one of the following: Active, Inactive, Closed, or Proposed

² Cubic yards, gallons, pounds, gallons/minute, pounds/hour, BTUs/hour, etc.

³ Tank is in non-hazardous waste service associated with a UIC pre-injection unit.

Technical NOD 1 Response
Hazardous Waste Permit Renewal Application

BASF Agricultural Solutions US LLC, Beaumont, Texas
Hazardous Waste Permit No. 50219

| |
|--|
| Core Data Form (Response to T1) |
|--|



TCEQ Core Data Form

For detailed instructions on completing this form, please read the Core Data Form Instructions or call 512-239-5175.

SECTION I: General Information

| | | |
|---|--|---|
| 1. Reason for Submission (If other is checked please describe in space provided.) | | |
| <input type="checkbox"/> New Permit, Registration or Authorization (Core Data Form should be submitted with the program application.) | | |
| <input checked="" type="checkbox"/> Renewal (Core Data Form should be submitted with the renewal form) | | <input checked="" type="checkbox"/> Other IHW Permit Renewal Legal entity change |
| 2. Customer Reference Number (if issued) | | 3. Regulated Entity Reference Number (if issued) |
| CN 600124895 605566066 | | RN 100634922 |

[Follow this link to search for CN or RN numbers in Central Registry**](#)


SECTION II: Customer Information

| | | | | | |
|---|--|--|--|--|--|
| 4. General Customer Information | | 5. Effective Date for Customer Information Updates (mm/dd/yyyy) | | 11/1/2025 | |
| <input checked="" type="checkbox"/> New Customer <input checked="" type="checkbox"/> Update to Customer Information <input type="checkbox"/> Change in Regulated Entity Ownership <input type="checkbox"/> Change in Legal Name (Verifiable with the Texas Secretary of State or Texas Comptroller of Public Accounts) | | | | | |
| <i>The Customer Name submitted here may be updated automatically based on what is current and active with the Texas Secretary of State (SOS) or Texas Comptroller of Public Accounts (CPA).</i> | | | | | |
| 6. Customer Legal Name (If an individual, print last name first: eg: Doe, John) | | | | <i>If new Customer, enter previous Customer below:</i> | |
| BASF Corporation Agricultural Solutions US LLC | | | | BASF Corporation | |
| 7. TX SOS/CPA Filing Number | | 8. TX State Tax ID (11 digits) | | 9. Federal Tax ID (9 digits) | |
| 000420547-6 0803002582 | | 11610908094- 32067010002 | | 161090809- 11-683-3577 | |
| 10. DUNS Number (if applicable) | | | | | |
| 074201658 | | | | | |
| 11. Type of Customer: <input checked="" type="checkbox"/> Corporation <input type="checkbox"/> Individual <input type="checkbox"/> Partnership: <input checked="" type="checkbox"/> General <input type="checkbox"/> Limited | | | | | |
| Government: <input type="checkbox"/> City <input type="checkbox"/> County <input type="checkbox"/> Federal <input type="checkbox"/> Local <input type="checkbox"/> State <input type="checkbox"/> Other | | | <input type="checkbox"/> Sole Proprietorship <input type="checkbox"/> Other: | | |
| 12. Number of Employees | | | | 13. Independently Owned and Operated? | |
| <input type="checkbox"/> 0-20 <input type="checkbox"/> 21-100 <input checked="" type="checkbox"/> 101-250 <input type="checkbox"/> 251-500 <input type="checkbox"/> 501 and higher | | | | <input checked="" type="checkbox"/> Yes <input checked="" type="checkbox"/> No | |
| 14. Customer Role (Proposed or Actual) – as it relates to the Regulated Entity listed on this form. Please check one of the following | | | | | |
| <input type="checkbox"/> Owner <input type="checkbox"/> Operator <input checked="" type="checkbox"/> Owner & Operator <input type="checkbox"/> Other: <input type="checkbox"/> Occupational Licensee <input type="checkbox"/> Responsible Party <input type="checkbox"/> VCP/BSA Applicant | | | | | |
| 15. Mailing Address: | | | | | |
| 14385 West Port Arthur Road 2 TW Alexander Drive | | | | | |
| City: Beaumont Research Triangle Park State: TX NC ZIP: 77705 27713 ZIP + 4: 9290 | | | | | |
| 16. Country Mailing Information (if outside USA) | | | 17. E-Mail Address (if applicable) | | |
| | | | | | |
| 18. Telephone Number | | 19. Extension or Code | | 20. Fax Number (if applicable) | |
| | | | | | |

SECTION III: Regulated Entity Information

| | | | | | | | | |
|---|-----------------------------|----------|--------------|----|------------|-------|----------------|------|
| 21. General Regulated Entity Information (If 'New Regulated Entity' is selected, a new permit application is also required.) | | | | | | | | |
| <input type="checkbox"/> New Regulated Entity <input type="checkbox"/> Update to Regulated Entity Name <input checked="" type="checkbox"/> Update to Regulated Entity Information | | | | | | | | |
| <i>The Regulated Entity Name submitted may be updated, in order to meet TCEQ Core Data Standards (removal of organizational endings such as Inc, LP, or LLC).</i> | | | | | | | | |
| 22. Regulated Entity Name (Enter name of the site where the regulated action is taking place.) | | | | | | | | |
| BASF Beaumont Agro Plant | | | | | | | | |
| 23. Street Address of the Regulated Entity: (No PO Boxes) | 14385 West Port Arthur Road | | | | | | | |
| | | | | | | | | |
| | City | Beaumont | State | TX | ZIP | 77705 | ZIP + 4 | 9290 |
| 24. County | Jefferson | | | | | | | |

If no Street Address is provided, fields 25-28 are required.

| | | | | | | | | |
|--|---|----------|---|----|--------------|--|-------------------------|------|
| 25. Description to Physical Location: | ~5 miles Southwest of the intersection of US-69 and TX-93 SPUR in Jefferson County, Tx | | | | | | | |
| 26. Nearest City | | | | | State | | Nearest ZIP Code | |
| Beaumont | | | | | TX | | 77705 | |
| <i>Latitude/Longitude are required and may be added/updated to meet TCEQ Core Data Standards. (Geocoding of the Physical Address may be used to supply coordinates where none have been provided or to gain accuracy).</i> | | | | | | | | |
| 27. Latitude (N) In Decimal: | | | 29.971667 | | | 28. Longitude (W) In Decimal: | | |
| Degrees | | | Minutes | | | Seconds | | |
| Degrees | | | Minutes | | | Seconds | | |
| | | | | | | | | |
| 29. Primary SIC Code (4 digits) | | | 30. Secondary SIC Code (4 digits) | | | 31. Primary NAICS Code (5 or 6 digits) | | |
| 2879 | | | 2869 | | | 325320 | | |
| | | | | | | 325199 | | |
| 33. What is the Primary Business of this entity? (Do not repeat the SIC or NAICS description.) | | | | | | | | |
| Manufacture of Agricultural Products | | | | | | | | |
| 34. Mailing Address: | 14385 West Port Arthur Road | | | | | | | |
| | | | | | | | | |
| | City | Beaumont | State | TX | ZIP | 77705 | ZIP + 4 | 9290 |
| 35. E-Mail Address: | | |  | | | | | |
| 36. Telephone Number | | | 37. Extension or Code | | | 38. Fax Number (if applicable) | | |
| (409) 981-5000 | | | 5139 | | | () - | | |

39. TCEQ Programs and ID Numbers Check all Programs and write in the permits/registration numbers that will be affected by the updates submitted on this form. See the Core Data Form instructions for additional guidance.

| | | | | |
|--|--|---|---|--|
| <input type="checkbox"/> Dam Safety | <input type="checkbox"/> Districts | <input type="checkbox"/> Edwards Aquifer | <input checked="" type="checkbox"/> Emissions Inventory Air | <input checked="" type="checkbox"/> Industrial Hazardous Waste |
| | | | JE0113D | 50219,30053 |
| <input type="checkbox"/> Municipal Solid Waste | <input checked="" type="checkbox"/> New Source Review Air | <input type="checkbox"/> OSSF | <input type="checkbox"/> Petroleum Storage Tank | <input type="checkbox"/> PWS |
| | 978B, 20057, 113174, 151935, 152562, 157151, 157585, 158173, 158481, 164582, 173963, 177952 | | | |
| <input type="checkbox"/> Sludge | <input checked="" type="checkbox"/> Storm Water | <input type="checkbox"/> Title V Air | <input type="checkbox"/> Tires | <input type="checkbox"/> Used Oil |
| | TXR05DA48 | | | |
| <input type="checkbox"/> Voluntary Cleanup | <input checked="" type="checkbox"/> Wastewater | <input type="checkbox"/> Wastewater Agriculture | <input type="checkbox"/> Water Rights | <input checked="" type="checkbox"/> Other: UIC |
| | WQ0001169000; TX0003671 | | | WDW155, WDW201, WDW301, WDW302, W DW433, WDW 434 |

SECTION IV: Preparer Information

| | | | | |
|---|---------------------------------|-----------------------|---------------------------|----------------|
| 40. Name: | Sheryl Kavetza Kendra D Derrick | | 41. Title: | EHS Specialist |
| 42. Telephone Number | 43. Ext./Code | 44. Fax Number | 45. E-Mail Address | |
| (513) 675-4908 (409) 249-8574 | | () - | | |

SECTION V: Authorized Signature

46. By my signature below, I certify, to the best of my knowledge, that the information provided in this form is true and complete, and that I have signature authority to submit this form on behalf of the entity specified in Section II, Field 6 and/or as required for the updates to the ID numbers identified in field 39.

| | | | | |
|-------------------------|--|-------------------|---------------|-------------------|
| Company: | BASF Corporation Agricultural Solutions US LLC | Job Title: | Site Manager | |
| Name (In Print): | Brenda L Neely | | Phone: | (409) 981- 5139 |
| Signature: | | | Date: | |

**Technical NOD 1 Response
Hazardous Waste Permit Renewal Application**

BASF Agricultural Solutions US LLC, Beaumont, Texas
Hazardous Waste Permit No. 50219

**Part B, Section I – Table I
(Response to T2)**

Permit No. 50219

Permittee: ~~BASF Corporation~~ BASF Agricultural Solutions US LLC

Page 1 of 6

Table I: General Information

A. Applicant: Facility Operator

| | |
|--|--|
| Name ¹ | BASF Corporation BASF Agricultural Solutions US LLC |
| Address ² | 14385 West Port Arthur Road |
| City, State ² | Beaumont, Texas |
| Zip Code ² | 77705 |
| Telephone Number | 409-981-5052 |
| Alternate Telephone Number | |
| TCEQ Solid Waste Registration No. | 30053 |
| EPA I.D. No. | TXD067261412 |
| Permit No. | 50219 |
| County | Jefferson |
| Regulated Entity Name | BASF Beaumont Agro Plant |
| Regulated Entity Reference Number (RN) | 100634922 |
| Customer Name ² | BASF Corporation BASF Agricultural Solutions US LLC |
| Customer Reference Number: | 600124895 605566066 |
| Charter Number ³ | 4205406 803002582 |
| Previous or Former Names of the Facility (if applicable) | |

B. Facility Owner: Identify the Facility Owner if different than the Facility Operator⁴

☒ Same as Facility Operator?

| | |
|----------------------------|--|
| Name | BASF Corporation BASF Agricultural Solutions US LLC |
| Address | 14385 West Port Arthur Road |
| City, State | Beaumont, Texas |
| Zip Code | 77705 |
| Telephone Number | 409-981-5052 |
| Alternate Telephone Number | |

C. Facility Contact**1. Persons or firms who will act as primary contact:**

| | |
|----------------------------|-----------------------------|
| Name, Title: | Brenda Neely, Site Director |
| Address | 14385 West Port Arthur Road |
| City, State: | Beaumont, Texas |
| Zip Code | 77705 |
| Telephone Number | 409-981-5139 |
| Alternate Telephone Number | |
| E-mail | |

Persons or firms who will act as primary contact (if more than one):

| | |
|----------------------------|--|
| Name, Title: | Sheryl Kavetza, EHS Specialist Kendra D Derrick, EHS Specialist |
| Address | 14385 West Port Arthur Road |
| City, State: | Beaumont, Texas |
| Zip Code | 77705 |
| Telephone Number | 513-675-4908 409-249-8574 |
| Alternate Telephone Number | |
| E-mail | |

2. Agent in Service or Agent of Service (if you are an out-of-state company)⁵:

| | |
|--------------|------------------------------|
| Name, Title: | C.T. Corporation |
| Address | 1999 Bryan Street, Suite 900 |
| City, State: | Dallas, Texas |
| Zip Code | 75201 |

3. Individual responsible for causing notice to be published:

| | |
|----------------------------|--|
| Name: | Sheryl Kavetza, EHS Specialist Kendra D Derrick, EHS Specialist |
| Address | 14385 West Port Arthur Road |
| City, State: | Beaumont, Texas |
| Zip Code | 77705 |
| Telephone Number | 513-675-4908 409-249-8574 |
| Alternate Telephone Number | |
| E-mail | |

4. Public place in county where application will be made available⁶:

| | |
|-------------|-------------------------------------|
| Name | Marion and Ed Hughes Public Library |
| Address | 2712 Nederland Avenue |
| City, State | Nederland, Texas |
| Zip Code | 77627 |

D. Application Type and Facility Status**1. Application Type**

- | | | |
|---|---|---|
| <input checked="" type="checkbox"/> Permit | <input checked="" type="checkbox"/> Amendment | <input type="checkbox"/> Modification |
| <input type="checkbox"/> New | <input checked="" type="checkbox"/> Major | <input type="checkbox"/> Class 3 |
| <input checked="" type="checkbox"/> Renewal | <input type="checkbox"/> Minor | <input type="checkbox"/> Class 2 |
| <input type="checkbox"/> Interim Status | | <input type="checkbox"/> Class 1 ¹ |
| <input type="checkbox"/> Compliance Plan | | <input type="checkbox"/> Class 1 |
| <input type="checkbox"/> RD&D | | |

2. Part of a Consolidated Permit Processing request? [30 TAC Chapter 33]

No

3. Does the application contain confidential material?⁷

No

4. Facility Status. Check all that apply

- | | |
|--|--|
| <input type="checkbox"/> Proposed | <input checked="" type="checkbox"/> On-Site |
| <input checked="" type="checkbox"/> Existing | <input type="checkbox"/> Off-site |
| | <input type="checkbox"/> Commercial |
| | <input type="checkbox"/> Recycle |
| | <input type="checkbox"/> Land Disposal |
| | <input type="checkbox"/> Areal or capacity expansion |
| | <input checked="" type="checkbox"/> Compliance plan |

5. Is the facility within the Coastal Management Program boundary?

Yes

6. Description of Application Changes

Complete Table I.1 - Description of Proposed Application Changes

Note: List all changes requested in Table. Unlisted requests risk remaining unaddressed or possibly denied if brought to the permit application reviewer's attention at a later time.

7. Total acreage of the facility being permitted:

490

8. Identify the name of the drainage basin and segment where the facility is located⁸

| | |
|---------------|------------------------------|
| River Segment | Taylor Bayou |
| River Basin | Neches-Trinity Coastal Basin |

E. Facility Siting Summary:

Is the facility located or proposed to be located:

- | | |
|---|-----|
| 1. Within a 100-year floodplain? | No |
| 2. in wetlands? | Yes |
| 3. In the critical habitat of an endangered species of plant or animal? | No |
| 4. On the recharge zone of a sole-source aquifer? | No |
| 5. In an area overlying a regional aquifer? | Yes |
| 6. Withing 0.5 mile (2,640 feet) of an established residence, church, school , day care center, surface water body used for public drinking water supply, or dedicated public park? ⁹ [30 TAC 335.202] If Yes: the TCEQ shall not issue a permit for this facility. | No |
| 7. In an area in which the governing body of the country or municipality has prohibited the processing or disposal of municipal hazardous waste or industrial solid waste? If yes: provide a copy of the ordinance or order. | No |

F. Wastewater and Stormwater Disposition

- | | |
|---|-----|
| 1. Is the disposal of any waste to be accomplished by a waste disposal well at this facility? | Yes |
|---|-----|

If Yes: List WDW Permit No(s):

155, 201, 301, 302, 433, 434

- | | |
|---|----|
| 2. Will any point source discharge of effluent or rainfall runoff occur as a result of the proposed activities? | No |
|---|----|

3. If Yes, is this discharge regulated by a TPDES or TCEQ permit?

☐ Yes

TCEQ Permit No.

TPDES Permit No.

☐ No

Date TCEQ discharge permit application filed:

Date TPDES discharge application filed:

G. Information Required to Provide Notice

State Officials List [30 TAC 39]

State Senator

Name: Robert Nichols [REDACTED]
Address 329 Neches Street
City, State: Jacksonville, Texas
Zip Code: 75766

State Representative

Name: Dade Phelan [REDACTED]
Address 812 North 16th Street
City, State: Orange, Texas
Zip Code: 78768

Local Officials List [30 TAC 39]

Mayor

Name: Roy West [REDACTED]
Address 801 Main Street
City, State: Beaumont, Texas
Zip Code: 77701

Local Health Authority

Name: [REDACTED]
Address 3040 College Street
City, State: Beaumont, Texas
Zip Code: 77701

County Judge

Name: Jeff Branick [REDACTED]
Address 1149 Pearl Street
City, State: Beaumont, Texas
Zip Code: 77701

County Health Authority

Name: Ezea Ede [REDACTED]
Address 740 Hospital Dr. #230
City, State: Beaumont, Texas
Zip Code: 77701

Based on the questions in the Bilingual Notice Instructions for this form, are you required to make alternate (Bilingual) notice for this application?

Yes

Bilingual Language(s):

Spanish

TCEQ Core Data Form Submitted?(Required)

Yes

Has any information changed on the TCEQ Core Data Form since the last submittal?

No

Signature on Application Submitted?
(see Section I Instructions, Item c)

Yes

1. Individual, Corporation, or Other Legal Entity Name on the Permit - must match the Secretary of State's database records for the Facility).
2. The legal name and address must match the Core Data Form.
3. If the application is submitted on behalf of a corporation, please identify the Charter Number as recorded with the Office of the Secretary of State for Texas.
4. The operator has the duty to submit an application if the facility is owned by one person and operated by another [30 TAC 305.43(b)]. The permit will specify the operator and the owner who is listed on Part A of this application [Section 361.087, Texas Health and Safety Code].
5. If the application is submitted by a corporation or by a person residing out of state, the applicant register an Agent in Service or Agent of Service with the Texas Secretary of State's office and provide a complete mailing address for the agent. The agent must be a Texas resident.
6. For applications for new permits, renewals, major amendments and Class 3 modifications a copy of the administratively complete application must be made available at a public place in the county where the facility is, or will be, located for review and copying by the public. Identify the public place in the county (e.g., public library, county court house, city hall), including the address, where the application will be made available for review and copying by the public.
7. For confidential information cross-reference the confidential material throughout the application to Section XIII: Confidential Material, and submit as a separate Section XIII document or binder conspicuously marked "CONFIDENTIAL".
8. Use the segments line map created by [TCEQ GIS Team](#) to find the Segment Name and Basin Name.
9. Use only for a new commercial hazardous waste management facility or areal expansion of an existing hazardous waste management facility or unit of that facility as defined in 30 TAC 335.202.

**Technical NOD 1 Response
Hazardous Waste Permit Renewal Application**

BASF Agricultural Solutions US LLC, Beaumont, Texas
Hazardous Waste Permit No. 50219

**Part B, Section I – Table I.1
(Response to T2)**

Table I.1-Description of Proposed Application Changes

| Permit/Compliance Plan Application Appendix/Section | Brief Description of Proposed Change | Modification or Amendment Type | Supporting Regulatory Citation |
|--|---|--------------------------------|--------------------------------|
| Part A; Part B, Section II; Part B Section V; Part B Section VI; and Part B All Sections | Part A and Part B Administrative and Informational Changes | Minor Amendment | 30 TAC 305.62 |
| Part B, Section III | Inspection, Security, Personnel Training, and Contingency Plans | Major Amendment | 30 TAC 305.62 |
| Part A and Part B, Section I | Update ownership information and site contact person | Class 1-1 | 30 TAC 305.69(k)(a)(7) |
| | | | |

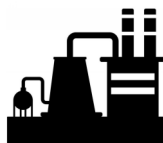
**Technical NOD 1 Response
Hazardous Waste Permit Renewal Application**

BASF Agricultural Solutions US LLC, Beaumont, Texas
Hazardous Waste Permit No. 50219

**Part A, Attachments E.1 and E.2
(Response to T5)**

Waste Generation

Dicamba /
FFP Loading/Unit Loading Rack Area /
Formulation /
Other Unit sumps



DMTA / HMP /
Facility Stormwater / Sanitary System
Effluent



Off-Site Waste Receipt

WOD Processing Area



Truck Loading Area

Waste Storage and Processing

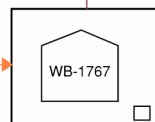
414 Tank Farm



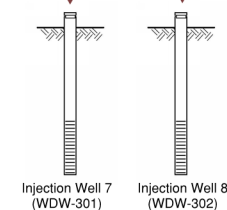
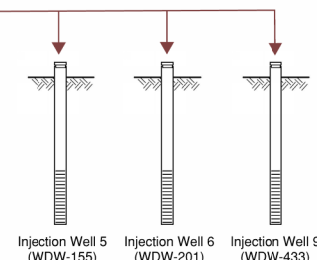
Valves
Normally
Closed



Million Gallon Tank Farm



Waste Disposal



LEGEND

- Facility wastewater and stormwater, except DMTA Unit
- - - → Dicamba wastewater recirculation to Million Gallon Tank Farm (Tanks WB-502 A/B)
- DMTA wastewater
- - - → DMTA wastewater recirculation to 414 Tank Farm
- Off-site waste from Tolling facility
- Waste to Injection Well
- Active UIC pre-injection tank
- Sump
- Valve

Notes:

- 1) See Attachment E.2 for notes to this waste flow diagram.
- 2) Only active Underground Injection Control (UIC) pre-injection tanks are shown in this waste flow diagram.
- 3) The UIC pre-injection tanks are used to store nonhazardous waste only for less than 90 days prior injection in UIC-permitted disposal wells.
- 4) The BASF Beaumont facility occasionally receives wastewater from other BASF facilities and a tolling facility (Jawhawk, Galena, Kansas) located more than 50 miles from the BASF Beaumont Agro Plant. That tolling facility processes BASF intermediate products and ships associated wastewater back to BASF via trucks in accordance with their agreement/contract without fee.



Texas Registration Number: F-1198

GSI Job No.: 10426

Drawn By: KCN

Issued: 14-Apr-2025

Chk'd By: KCN

Revised: 4-Sep-2025

Apr'd By: JMM

Scale: Not to scale

ATTACHMENT E.1

WASTE FLOW DIAGRAM

Hazardous Waste Permit Renewal Application

Hazardous Waste Permit No. 50219
BASF Beaumont Agro Plant, Beaumont, Texas



**ATTACHMENT E.2
NOTES TO WASTE FLOW DIAGRAM**

**Hazardous Waste Permit Renewal Application
Hazardous Waste Permit No. 50219
BASF Beaumont Agro Plant, Beaumont, Texas**

1.0 414 TANK FARM

1.1 Tanks F-414B and F-414C

Tanks F-414B and F-414C serve primarily as the first stage storage of the Dicamba commingled wastewater. This wastewater is sourced primarily from the Dicamba process unit, FFP loading rack, formulations, the WOD processing area (which also receives off-site wastewater), and the containment sumps at the F-414 Tank Farm. Water from tanks F-414B and F-414C is pumped through the WC-505 filters and to F-414A for storage before disposal via the Underground Injection Control (UIC)-permitted injection wells. Additionally, the F-414 tanks are configured such that wastewater can be recirculated between the tanks.

F-414A, F-414B and F-414C are registered on the facility's Notice of Registration (NOR) as wastewater storage tanks under the UIC program.

1.2 Tank F-414A

F-414A serves as the final wastewater storage tank prior to injection in UIC-permitted waste disposal wells WDW-155, WDW-201, and WDW-433 (also known as Injection Wells 5, 6, and 9, respectively). F-414A can also receive wastewater from Dicamba's main neutralization sump, B-248 if bypassing F-414B and C is needed.

2.0 MILLION GALLON TANK FARM

2.1 Tank WB-501 (Not Permitted)

WB-501 serves primarily as the first stage of storage for DMTA Unit wastewater generated in tank B-1757 and containment sumps at the Million Gallon Tank Area. Wastewater overflow from WB-501 is pumped to tank WB-502A or/and WB-502B (via overflow from WB-502A) for additional storage before disposal.

WB-1765, WB-501, WB-502A, and WB-502B are registered on the facility's NOR as elementary neutralization units.

2.2 Tanks WB-502A and WB-502B

WB-502A and WB-502B receive DMTA wastewater from tank WB-501. WB-502A and WB-502B are interconnected, allowing the co-mingling of wastewater between the two tanks. In the event that additional storage space is necessary due to an upset at the facility,

Deleted: Notice of Registration (

Deleted:)

liquids are transferred to WB-502B. The wastewater from WB-502A and WB-502B is pumped to the WB-1765 outlet, and then to tank WB-1767 for final storage before disposal via injection wells.

2.3 Tank WB-1765

WB-1765 is used to collect wastewater before it is filtered and pumped to tank WB-1767, which serves as the final wastewater storage. WB-1765 is fed primarily from tank WB-501; however, WB-1765 can also receive aqueous waste from DMTA tank WB-1757. The tank also receives wastewater from containment sump WB-1747, as well as filter backwash stored in B-1746 via pump WA-1746.

3.0 TANK WB-1767

WB-1767 serves as the final DMTA wastewater storage tank and includes ancillary injection pumps A-1767A and A-1767B that feed UIC-permitted injection wells WDW-301 and WDW-302, which are also known as Injection Wells 7 and 8. The wastewater is produced mainly from the DMTA process and containment sumps at the Million Gallon Tank Area.

DMTA wastewater is pumped from the unit to WB-501. Overflow from WB-501 is pumped to WB-502A through the WC-501 filters, then to WB-1765, and finally pumped to WB-1767.

WB-1767 is listed on the facility's NOR as an injection well head tank under the UIC program.

**Technical NOD 1 Response
Hazardous Waste Permit Renewal Application**

BASF Agricultural Solutions US LLC, Beaumont, Texas
Hazardous Waste Permit No. 50219

**Part B, Section IV – Appendix IV.D Waste
Analysis Plan (Responses to T6 and T7)**

GSI Job No. 10426
Issued: 4 September 2025



Deleted: 14

Deleted: April

APPENDIX IV.D WASTE ANALYSIS PLAN

Hazardous Waste Permit Renewal Application

Hazardous Waste Permit No. 50219
BASF Beaumont Agro Plant, Beaumont, Texas

1.0 INTRODUCTION AND FACILITY OVERVIEW

The BASF Beaumont Agro Plant (BASF Beaumont) facility utilizes five permitted Class I injection wells for the disposal of non-hazardous industrial process wastewater: Well Nos. 5, 6, 7, 8, and 9 (WDW-155, -201, -301, -302, and -433, respectively). Injection primarily occurs into the permitted Lower Miocene formation and the Frio formation, at depths ranging from approximately 3,800 feet to 8,250 feet below ground surface.

2.0 WASTE GENERATION AND SOURCES

The BASF Beaumont facility is authorized to inject non-hazardous aqueous liquid wastes generated primarily from the manufacturing processes of herbicides, specifically from the Dicamba and Dimethenamid (DMTA) units. Waste streams originate from various points within these processes where contact with raw materials, intermediates, or products may occur.

Additional authorized waste sources include:

- The Formulations, Filling, and Packaging (FFP) unit, which processes final products and generates wastewater from cleanups and loading/unloading activities.
- General plant operations (e.g., tank farms, utilities wastewater).
- Non-hazardous wash waters and cleaning solutions for process equipment.
- Compatible, non-hazardous streams received from off-site BASF facilities (e.g., Hannibal, Missouri; Total Petrochemical, Port Arthur, Texas) and approved third-party facilities (e.g., Jayhawk, Galena, Kansas) since 2018: Note that the Jayhawk facility produces a formulation for BASF, using BASF technology, and only sends the non-hazardous wastes generated from this specific process to BASF for disposal. As part of this arrangement, BASF pays Jayhawk to formulate the product and assumes the disposal costs.

3.0 WASTE MANAGEMENT AND PROCESSING

Wastewater streams are collected and managed in designated tank systems before injection, including:

- The "414 Tank Farm" (Tanks F-414A, F-414B, and F-414C) receiving Dicamba, FFP, and off-site wastes, typically feeding Wells 5, 6, and 9.
- DMTA wastes from Tanks WB-502A, WB-502B, WB-1765, and WB-1767 typically feeding Wells 7 and 8.

While streams can be commingled for pH management, the facility maintains operational flexibility to route compatible waste streams to active injection well as needed.

4.0 WASTE CLASSIFICATION AND CHARACTERISTICS

All injected waste streams are classified as non-hazardous industrial wastes under Texas Commission on Environmental Quality (TCEQ) regulations, as listed in Table IV.B. Consequently, the wastes do not carry U.S. Environmental Protection Agency (EPA) hazardous waste codes.

Key characteristics of the composite waste stream include:

Deleted: 14 April

- Chemically stable, clear to amber liquid
- Permitted pH range: > 2.0 to < 12.5
- Permitted Specific Gravity: < 1.20 g/ml at 20°C
- Estimated Viscosity: 1 centipoise at 68°F
- No radioactive elements

5.0 WASTE ANALYSIS AND MONITORING PLAN

The sampling and analysis information are summarized in Table IV.C.

6.0 OFF-SITE GENERATED NON-HAZARDOUS WASTES

Prior to bringing any new waste stream to BASF Beaumont, each off-site location must provide documentation of the hazardous waste determination for the waste stream to the BASF Beaumont Environmental Health & Safety (EHS) Group for approval. Documentation must consist of waste analysis or appropriate process knowledge as described under 40 Code of Federal Regulations (CFR) 261.

Prior to accepting a tank truck, the off-site generator must also provide a 1-quart jar for testing in the BASF Beaumont Quality Assurance (QA) laboratory. Parameters to be analyzed include the following:

- Flash point > 150F
- Specific gravity >0.99 to <1.20
- pH >2.0 to <12.5
- Compatibility at 1:1 ratio No exothermic reaction, precipitant forming, or off gassing

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The unloading location will be at: i) B-548 sump, which is located north of the DCSA roll-off staging area; ii) B-514, which is located south of the roll-off staging area; or iii) S-440 sump, which is located at sand filter area. BASF will stop all transfers if there are any indications of leaks or unusual odors. When unloading off-site wastes from a truck, the site-specific check sheet, including waste manifest and testing results verification, must be used and turned in with truck paperwork to BASF Beaumont supervision.

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**Technical NOD 1 Response
Hazardous Waste Permit Renewal Application**

BASF Agricultural Solutions US LLC, Beaumont, Texas
Hazardous Waste Permit No. 50219

**Part B, Section V – Table V.C
(Response to T8)**

Table V.C. - Tanks and Tank Systems

| Permit Unit No. | Tank | N.O.R. No. | Storage and/or Processing | Waste Nos. ¹ | Rated Capacity | Dimensions | Containment Volume (including rainfall for unenclosed areas) | Unit will manage Ignitable, Reactive, or Incompatible waste (state all that apply) | Unit Status |
|-----------------|---------|------------|---------------------------|-------------------------|----------------|-------------------|--|--|-------------|
| 07 | F-414A | 042 | Storage | NA | 196,202 gal | 46' dia x 16' | 262,199 gal | No | Active |
| 08 | WB-1767 | 061 | Storage | NA | 150,000 gal | 30' dia x 29' | 226,327 gal | No | Active |
| 09 | F-414B | 042 | Storage | NA | 197,000 gal | 46' dia x 16' | 262,199 gal | No | Active |
| 10 | F-414C | 069 | Storage | NA | 197,000 gal | 46' dia x 16' | 262,199 gal | No | Active |
| 12 | WB-502A | 073 | Storage | NA | 1,000,000 gal | 69'9" dia x 35'9" | 1,333,335 gal | No | Active |
| 13 | WB-502B | 074 | Storage | NA | 1,000,000 gal | 69'9" dia x 35'9" | 1,333,335 gal | No | Active |
| 14 | WB-1765 | 071 | Storage | NA | 1,000,000 gal | 69'9" dia x 35'9" | 1,333,335 gal | No | Active |

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**Technical NOD 1 Response
Hazardous Waste Permit Renewal Application**

BASF Agricultural Solutions US LLC, Beaumont, Texas
Hazardous Waste Permit No. 50219

**Part B, Section V – Appendix V.A
Engineering Report
(Response to T9)**



PART B APPLICATION
APPENDIX V.A - GENERAL ENGINEERING REPORT

Hazardous Waste Permit Renewal Application

Hazardous Waste Permit No. 50219
BASF Beaumont Agro Plant, Beaumont, Texas

I, James M. McDade, a registered professional engineer in the State of Texas, certify that the Engineering Report in the Hazardous Waste Permit Renewal Application, [dated 14 March 2025](#) and [submitted on 14 April 2025](#) for the following waste management units at the BASF Beaumont Agro Plant located in Beaumont, Texas, has been prepared in accordance with good engineering practices, requirements of 30 TAC 305.45(a)(8)(A), and the TCEQ RCRA Permit Application (TCEQ-00376, Revised 1 March 2023):

- Tanks F-414A, F-414B, and F-414C (Permit Unit Nos. 07, 09, and 10);
- Tank WB-1767 (Permit Unit No. 08); and
- Tanks WB-502A, WB-502B, and WB-1765 (Permit Unit Nos. 12, 13, and 14).

James M. McDade, P.E.
State of Texas Registration No. 115868
GSI Environmental Inc.
Texas Registration No. F-1198

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**Technical NOD 1 Response
Hazardous Waste Permit Renewal Application**

BASF Agricultural Solutions US LLC, Beaumont, Texas
Hazardous Waste Permit No. 50219

**Part B, Section VII – Tables VII.B, VII.B.1,
and VII.E.1 (Response to T10)**

Table VII.B - Unit Closure Cost Estimate

| Task | Cost |
|--|----------------------|
| Tank F-414A (Permit Unit 07) | |
| Mobilization (lump sum cost per event) | \$2,600 |
| Site setup (supervisory personnel for 3 weeks with the unit cost of \$2,600/week) | \$7,800 |
| Disposal of stormwater (assume 8,167 gallons with the unit cost of \$0.40/gal) | \$3,267 |
| Disposal of wastewater (assume 196,202 gallons with the unit cost of \$0.40/gal) | \$78,481 |
| Decontamination of tanks, piping, and secondary containment, including sample collection | \$13,400 |
| Analysis of secondary containment decontamination rinsate samples for pH, VOCs, SVOCs, TPH and Metals (estimate 2 samples with the unit cost of \$422/sample) | \$844 |
| Analysis of equipment decontamination rinsate samples at end of work program for pH, VOCs, SVOCs, TPH and Metals (estimate 5 samples with the unit cost of \$422/sample) | \$2,110 |
| Closure certification | \$3,500 |
| Subtotal | \$112,002 |
| Contingency (10% minimum) | \$11,200 |
| Total Closure Cost | Year 2025 |

2024

Table VII.B - Unit Closure Cost Estimate

| Task | Cost |
|--|----------------------|
| Tank WB-1767 (Permit Unit 08) | |
| Mobilization (lump sum cost per event) | \$2,600 |
| Site setup (supervisory personnel for 3 weeks with the unit cost of \$2,600/week) | \$7,800 |
| Disposal of stormwater (assume 10,600 gallons with the unit cost of \$0.40/gal) | \$4,240 |
| Disposal of wastewater (assume 150,000 gallons with the unit cost of \$0.40/gal) | \$60,000 |
| Decontamination of tanks, piping, and secondary containment, including sample collection | \$10,300 |
| Analysis of secondary containment decontamination rinsate samples for pH, VOCs, SVOCs, TPH and Metals (estimate 2 samples with the unit cost of \$422/sample) | \$844 |
| Analysis of equipment decontamination rinsate samples at end of work program for pH, VOCs, SVOCs, TPH and Metals (estimate 5 samples with the unit cost of \$422/sample) | \$2,110 |
| Closure certification | \$3,500 |
| Subtotal | \$91,394 |
| Contingency (10% minimum) | \$9,139 |
| Total Closure Cost | Year 2025 |

2024

Table VII.B - Unit Closure Cost Estimate

| Task | Cost |
|--|----------------------|
| Tank F-414B (Permit Unit 09) | |
| Mobilization (lump sum cost per event) | \$2,600 |
| Site setup (supervisory personnel for 3 weeks with the unit cost of \$2,600/week) | \$7,800 |
| Disposal of stormwater (assume 8,167 gallons with the unit cost of \$0.40/gal) | \$3,267 |
| Disposal of wastewater (assume 197,000 gallons with the unit cost of \$0.40/gal) | \$78,800 |
| Decontamination of tanks, piping, and secondary containment, including sample collection | \$13,400 |
| Analysis of secondary containment decontamination rinsate samples for pH, VOCs, SVOCs, TPH and Metals (estimate 2 samples with the unit cost of \$422/sample) | \$844 |
| Analysis of equipment decontamination rinsate samples at end of work program for pH, VOCs, SVOCs, TPH and Metals (estimate 5 samples with the unit cost of \$422/sample) | \$2,110 |
| Closure certification | \$3,500 |
| Subtotal | \$112,321 |
| Contingency (10% minimum) | \$11,232 |
| Total Closure Cost | Year 2025 |

2024

Table VII.B - Unit Closure Cost Estimate

| Task | Cost |
|--|----------------------|
| Tank F-414C (Permit Unit 10) | |
| Mobilization (lump sum cost per event) | \$2,600 |
| Site setup (supervisory personnel for 3 weeks with the unit cost of \$2,600/week) | \$7,800 |
| Disposal of stormwater (assume 8,167 gallons with the unit cost of \$0.40/gal) | \$3,267 |
| Disposal of wastewater (assume 197,000 gallons with the unit cost of \$0.40/gal) | \$78,800 |
| Decontamination of tanks, piping, and secondary containment, including sample collection | \$13,400 |
| Analysis of secondary containment decontamination rinsate samples for pH, VOCs, SVOCs, TPH and Metals (estimate 2 samples with the unit cost of \$422/sample) | \$844 |
| Analysis of equipment decontamination rinsate samples at end of work program for pH, VOCs, SVOCs, TPH and Metals (estimate 5 samples with the unit cost of \$422/sample) | \$2,110 |
| Closure certification | \$3,500 |
| Subtotal | \$112,321 |
| Contingency (10% minimum) | \$11,232 |
| Total Closure Cost | Year 2025 |

2024

Table VII.B - Unit Closure Cost Estimate

| Task | Cost |
|--|----------------------|
| Tank WB-502A (Permit Unit 12) | |
| Mobilization (lump sum cost per event) | \$2,600 |
| Site setup (supervisory personnel for 5 weeks with the unit cost of \$2,600/week) | \$13,000 |
| Disposal of stormwater (assume 17,800 gallons with the unit cost of \$0.40/gal) | \$7,120 |
| Disposal of wastewater (assume 1,000,000 gallons with the unit cost of \$0.40/gal) | \$400,000 |
| Decontamination of tanks, piping, and secondary containment, including sample collection | \$66,600 |
| Analysis of secondary containment decontamination rinsate samples for pH, VOCs, SVOCs, TPH and Metals (estimate 2 samples with the unit cost of \$422/sample) | \$844 |
| Analysis of equipment decontamination rinsate samples at end of work program for pH, VOCs, SVOCs, TPH and Metals (estimate 5 samples with the unit cost of \$422/sample) | \$2,110 |
| Closure certification | \$3,500 |
| Subtotal | \$495,774 |
| Contingency (10% minimum) | \$49,577 |
| Total Closure Cost | Year 2025 |

2024

Table VII.B - Unit Closure Cost Estimate

| Task | Cost |
|--|----------------------|
| Tank WB-502B (Permit Unit 13) | |
| Mobilization (lump sum cost per event) | \$2,600 |
| Site setup (supervisory personnel for 5 weeks with the unit cost of \$2,600/week) | \$13,000 |
| Disposal of stormwater (assume 17,800 gallons with the unit cost of \$0.40/gal) | \$7,120 |
| Disposal of wastewater (assume 1,000,000 gallons with the unit cost of \$0.40/gal) | \$400,000 |
| Decontamination of tanks, piping, and secondary containment, including sample collection | \$66,600 |
| Analysis of secondary containment decontamination rinsate samples for pH, VOCs, SVOCs, TPH and Metals (estimate 2 samples with the unit cost of \$422/sample) | \$844 |
| Analysis of equipment decontamination rinsate samples at end of work program for pH, VOCs, SVOCs, TPH and Metals (estimate 5 samples with the unit cost of \$422/sample) | \$2,110 |
| Closure certification | \$3,500 |
| Subtotal | \$495,774 |
| Contingency (10% minimum) | \$49,577 |
| Total Closure Cost | Year 2025 |

2024

Table VII.B - Unit Closure Cost Estimate

| Task | Cost |
|--|----------------------|
| Tank WB-1765 (Permit Unit 14) | |
| Mobilization (lump sum cost per event) | \$2,600 |
| Site setup (supervisory personnel for 5 weeks with the unit cost of \$2,600/week) | \$13,000 |
| Disposal of stormwater (assume 17,800 gallons with the unit cost of \$0.40/gal) | \$7,120 |
| Disposal of wastewater (assume 1,000,000 gallons with the unit cost of \$0.40/gal) | \$400,000 |
| Decontamination of tanks, piping, and secondary containment, including sample collection | \$66,600 |
| Analysis of secondary containment decontamination rinsate samples for pH, VOCs, SVOCs, TPH and Metals (estimate 2 samples with the unit cost of \$422/sample) | \$844 |
| Analysis of equipment decontamination rinsate samples at end of work program for pH, VOCs, SVOCs, TPH and Metals (estimate 5 samples with the unit cost of \$422/sample) | \$2,110 |
| Closure certification | \$3,500 |
| Subtotal | \$495,774 |
| Contingency (10% minimum) | \$49,577 |
| Total Closure Cost | Year 2025 |

2024

Table VII.B.1 Closure Cost Estimate: Unit Rates

| | Cost for Closure Estimate | | Quote from Vendor | | Quote Source |
|---|---------------------------|--------|-------------------|--------|----------------------|
| | Unit Cost ¹ | Unit | Unit Cost | Unit | |
| CLOSURE COST | | | | | |
| 1. Tanks | | | | | |
| Site Preparation | | | | | |
| Mobilization | \$ 2,600 | total | \$ 2,500 | total | CIMA 2024 |
| Site Setup | \$ 2,600 | week | \$ 2,500 | week | CIMA 2024 |
| Disposal of Stormwater | \$ 0.40 | gal | \$ 0.39 | gal | Texas Molecular 2024 |
| Waste Removal | | | | | |
| Disposal of Wastewater | \$ 0.40 | gal | \$ 0.39 | gal | Texas Molecular 2024 |
| Decontamination of Tanks, Piping, and Secondary Containment, Including Sample Collection (Tanks WB-1765, WB-502A and WB-502B) | \$ 66,600 | each | \$ 65,000 | each | CIMA 2024 |
| Decontamination of Tanks, Piping, and Secondary Containment, Including Sample Collection (Tanks F-414A, F-414B and F-414C) | \$ 13,400 | each | \$ 13,000 | each | CIMA 2024 |
| Decontamination of Tanks, Piping, and Secondary Containment, Including Sample Collection (Tank WB-1767) | \$ 10,300 | each | \$ 10,000 | each | CIMA 2024 |
| Analysis of Equipment Decontamination Rinsate Samples for pH, VOCs, SVOCs, TPH and Metals | \$ 422 | sample | \$ 413 | sample | Eurofins Quote 2024 |
| Analysis of Secondary Containment Decontamination Rinsate Samples for pH, VOCs, SVOCs, TPH and Metals | \$ 422 | sample | \$ 413 | sample | Eurofins Quote 2024 |
| Documentation | | | | | |
| Closure Certification | \$ 3,500 | total | \$ 3,500 | total | GSI Cost 2025 |

Notes:
1. The costs listed in this table are based on ~~2025~~ dollar values or updated for inflation where necessary.
2024

Table VII.E.1 - Permitted Unit Closure Cost Summary

| Existing Unit Closure Cost Estimate | | |
|--|----------------------|--------------|
| Unit | Cost | |
| Tank F-414A (Permit Unit 07) | \$ | 123,200 |
| Tank WB-1767 (Permit Unit 08) | \$ | 100,500 |
| Tank F-414B (Permit Unit 09) | \$ | 123,600 |
| Tank F-414C (Permit Unit 10) | \$ | 123,600 |
| Tank WB-502A (Permit Unit 12) | \$ | 545,400 |
| Tank WB-502B (Permit Unit 13) | \$ | 545,400 |
| Tank WB-1765 (Permit Unit 14) | \$ | 545,400 |
| Total Existing Unit Closure Cost Estimate¹ | Year 2025 | \$ 2,107,100 |

2024

| Proposed Unit Closure Cost Estimate | | |
|--|----------------------|---|
| Unit | Cost | |
| Not Applicable | | |
| | | |
| Total Proposed Unit Closure Cost Estimate¹ | Year 2025 | - |

2024

1. As units are added or deleted from these tables through future permit amendments or modifications, the remaining itemized unit costs should be updated for inflation when re-calculating the revised total cost in current dollars.

Table VII.E.2 - Permitted Unit Post-Closure Cost Summary

| Existing Unit Post-Closure Cost Estimate | | |
|---|--|-------------|
| Unit | | Cost |
| Not Applicable | | |
| | | |
| Total Existing Unit Post-Closure Cost Estimate ¹ | | Year 2025 - |

2024

| Proposed Unit Post-Closure Cost Estimate | | |
|---|--|-------------|
| Unit | | Cost |
| Not Applicable | | |
| | | |
| Total Proposed Unit Post-Closure Cost Estimate ¹ | | Year 2025 - |

2024

1. As units are added or deleted from these tables through future permit amendments or modifications, the remaining itemized unit costs should be updated for inflation when re-calculating the revised total cost in current dollars.

Technical NOD 1 Response Hazardous Waste Permit Renewal Application

BASF Agricultural Solutions US LLC, Beaumont, Texas
Hazardous Waste Permit No. 50219

Attachment 3 – Replacement Application Pages and Tables

Contents

- Part A Application Form
- Core Data Form
- Part B, Section I – Table I
- Part B, Section I – Table I.1
- Part A, Attachment B – Legal Description
- Part A, Attachment E.1 and E.2 – Waste Flow Diagram
- Part B, Section IV – Waste Analysis Plan
- Part B, Section V – Table V.C
- Part B, Section V – Appendix V.A
- Part B, Section VII – Tables VII.B, VII.B.1, and VII.E.1
- Part B, Section VIII – Appendix VIII.A

**Technical NOD 1 Response
Hazardous Waste Permit Renewal Application**

BASF Agricultural Solutions US LLC, Beaumont, Texas
Hazardous Waste Permit No. 50219

Part A (Responses to T1 and T4)



Texas Commission on Environmental Quality Instructions and Procedural Information for Filing a Permit Application for a Hazardous Waste Storage, Processing, or Disposal Facility

Part A

[Form Availability: This form, as well as other Industrial and Hazardous Waste documents, is available on the Internet World Wide Web, Industrial and Hazardous Waste home page at address https://www.tceq.texas.gov/permitting/waste_permits/ihw_permits]

General Instructions

1. A person (individual, corporation or other legal entity) who stores, processes or disposes of hazardous waste (except where such storage and/or processing is excluded from permit requirements in accordance with 30 Texas Administrative Code (TAC) Section 335.2) must obtain a permit pursuant to the Texas Health and Safety Code. In applying to the Texas Commission on Environmental Quality, hereafter referred to as the Commission, the applicant shall follow the procedures outlined below, on the application and in the Rules of the Commission.
2. The application (one original plus three (3) complete copies¹) should be mailed to:

Texas Commission on Environmental Quality
Attention: Waste Permits Division, MC126
P. O. Box 13087
Austin, Texas 78711-3087
3. Signature on Application [30 TAC 305.44]. The application shall be signed by the owner and operator or by a duly authorized agent, employee, officer, or representative of the owner or operator and shall be verified before a notary public. When another person signs on behalf of the owner and operator, this person's title or relationship to the owner or operator should be shown. In all cases, the person signing the form should be authorized to do so by the owner or operator (the Commission may require a person signing on behalf of an owner or operator to provide proof of authorization). An application submitted for a corporation must be signed by (or the signatory must be authorized by) a responsible corporate officer such as a president, secretary, treasurer, vice-president, or designated manager; or for a partnership or sole proprietorship, by a general partner or the proprietor, respectively. In the case of a municipal, state, federal, or other public facility, the application shall be signed by either a principal executive

¹ The third copy may optionally consist of paper copies of all plans and maps and a computer diskette of the remaining document. The document should be formatted in Word processing software up to and including version 6.1 or a 100% compatible format. Files may be compressed using PKZIP Ver. 2 or a 100% compatible program.

officer or ranking elected official.

4. An application will not be processed until all information required to properly evaluate the application has been obtained. When an application is severely lacking in detail and/or the applicant fails to submit additionally requested information in a timely manner, the application will not be considered to be "filed in accordance with the rules and regulations of the Commission."

Please submit any application revisions with a revised date and page numbers at the bottom of the page(s).

5. Fees and Costs

- a. The fee for filing an application is discussed in Section XII of Part B, form number TCEQ-0376.
- b. The applicant for a permit is required to bear the cost of publication of notice of the application in a newspaper as prescribed by 30 TAC Section 39.405(f).

6. A person may not commence operation of a hazardous waste management facility until the Commission has issued a permit to authorize the storage, processing, or disposal of hazardous waste, except with the approval of the Commission.

7. Designation of Material as Confidential

The designation of material as confidential is frequently carried to excess. The Commission has a responsibility to provide a copy of each application to other review agencies and to interested persons upon request and to safeguard confidential material from becoming public knowledge. Thus, the Commission requests that the applicant (1) be prudent in the designation of material as confidential and (2) submit such material only when it might be essential to the staff in their development of a recommendation.

The Commission suggests that the applicant NOT submit confidential information as part of the permit application. However, if this cannot be avoided, the confidential information should be described in non-confidential terms throughout the application, and submitted as a document or binder, and conspicuously marked "CONFIDENTIAL."

Reasons of confidentiality include the concept of trade secrecy and other related legal concepts which give a business the right to preserve confidentiality of business information to obtain or retain advantages from its right in the information. This includes authorizations under 18 U.S.C. 1905 and special rules cited in 40 CFR Chapter I, Part 2, Subpart B.

Section 361.037 of the Texas Health and Safety Code does not allow an applicant for an industrial and hazardous waste permit to claim as confidential any record pertaining to the characteristics of the industrial solid waste.

The applicant may elect to withdraw any confidential material submitted with the application. However, the permit cannot be issued, amended, or modified if the application is incomplete.

Part II

Procedural Information

After the submittal of Parts A and B of the application, the TCEQ will provide public notice of receipt of the application. The Executive Director's staff will review the application for completeness of information submitted. During the review, the applicant may be contacted for clarification or additional information. When all pertinent information is present, the application or a summary of its contents will be forwarded for review by other state agencies and local governmental entities interested in water quality control and solid waste management. After technical evaluation, opportunity for public hearing will be afforded.

Note that for facilities which had "commenced on-site storage, processing, or disposal of hazardous waste" [see 30 TAC Section 335.43(b)] on or before the date such waste is identified or listed as hazardous by EPA, the Texas Health and Safety Code provides in Section 361.082(f) that these facilities may continue to manage hazardous waste until such time as the Commission approves or denies the application, provided that the applicant has filed the permit application in accordance with the rules and regulations of the Commission.

The Commission may act upon an application for a permit, permit amendment, permit modification, or renewal of a permit without the necessity of holding a public hearing:

1. (a) When notice of the application has been mailed to persons possibly affected by the proposed permit; and

(b) When notice has been published at least once in a newspaper regularly published or circulated within each county where the proposed facility is located; and

(c) Within forty-five (45) days following publication of the Commission's notice, a Commissioner, the Executive Director or an affected person has not requested a public hearing; or
2. For a Class 1 or a Class 2 permit modification or a minor amendment to a permit. The Commission may, in certain cases, hold a public hearing for a Class 2 permit modification or a minor amendment.

A public hearing may be scheduled on an application for a RCRA hazardous waste permit when requested by a Commissioner, the Executive Director, or an affected person within forty-five (45) days following the newspaper publication.

Requirements of Giving Notice of the Application:

1. By the Applicant: Every applicant for a permit, permit amendment, permit modification, or permit renewal shall publish notice (see note below) of the application at least once in a newspaper regularly published or circulated within each county where the proposed facility is located. Where a public hearing has been requested, notice will be mailed to the applicant in ample time for publication, which shall be not less than thirty (30) days prior to the date set for the hearing. Except in the case of a notice of a permit modification request, the Commission will mail the appropriate notice and instructions for publication to the applicant.

NOTE: Additional publication and direct mail notice to affected persons will result if a public hearing is requested following newspaper publication of the notice of application. The cost of providing this additionally required publication and service of notice to affected persons will be assumed by the applicant.

2. By the Texas Commission on Environmental Quality: The Commission will mail notice of

the application (except for permit modifications) to affected persons and certain governmental entities. The notice will be mailed at the same time instructions for newspaper publications are mailed to the applicant.

3. **Bilingual Notice Instructions:**

For certain permit applications, public notice in an alternate language is required. If an elementary school or middle school nearest to the facility offers a bilingual program, notice may be required to be published in an alternative language. The Texas Education Code, upon which the TCEQ alternative language notice requirements are based, requires a bilingual education program for an entire school district should the requisite alternative language speaking student population exist. However, there may not be any bilingual-speaking students at a particular school within a district which is required to offer the bilingual education program. For this reason, the requirement to publish notice in an alternative language is triggered if the nearest elementary or middle school, as part of a larger school district, is required to make a bilingual education program available to qualifying students and either the school has students enrolled at such a program on-site, or has students who attend such a program at another location to satisfy the school's obligation to provide such a program.

If it is determined that a bilingual notice is required, the applicant is responsible for ensuring that the publication in the alternate language is complete and accurate in that language. Electronic versions of the Spanish template examples are available from the TCEQ to help the applicant complete the publication in the alternative language.

Bilingual Notice Application Form:

Bilingual notice confirmation for this application:

1. Is the school district of the elementary or middle school nearest to the facility required by the Texas Education Code to have a bilingual program?

☒ YES ☐ NO

(If NO, alternative language notice publication not required)

2. If YES to question 1, are students enrolled in a bilingual education program at either the elementary school or the middle school nearest to the facility?

☒ YES ☐ NO

(If YES to questions 1 and 2, alternative language publication is required; If NO to question 2, then consider the next question)

3. If YES to question 1, are there students enrolled at either the elementary school or the middle school nearest to the facility who attend a bilingual education program at another location?

☒ YES ☐ NO

(If Yes to questions 1 and 3, alternative language publication is required; If NO to question 3, then consider the next question)

4. If YES to question 1, would either the elementary school or the middle school nearest to the facility be required to provide a bilingual education program but for the fact that it secured a waiver from this requirement, as available under 19 TAC 89.1205(g)?

☒ YES ☐ NO

(If **Yes** to questions 1 and 4, alternative language publication is required; If **NO** to question 4, alternative language notice publication not required)

If a bilingual education program(s) is provided by either the elementary school or the middle school nearest to the facility, which language(s) is required by the bilingual program? Spanish

Consideration of the Permit Application by the Commission:

The applicant will be notified by the Commission when the application is set for final consideration. If the Commission issues the permit, the applicant will be mailed a copy of the permit by the TCEQ Office of the Chief Clerk within one (1) month following Commission approval. (NOTE: Only one copy is mailed to the applicant and that copy will be sent to the official mailing address of the applicant as shown on the permit application form.)

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Texas Commission on Environmental Quality
Permit Application for a Hazardous Waste Storage/Processing/Disposal Facility
Part A - Facility Background Information

I. General Information

A. Facility Name: **BASF Agricultural Solutions US LLC**

(Individual, Corporation, or Other Legal Entity Name)

TCEQ Solid Waste Registration No: **30053** EPA I.D. No.: **TXD067261412**

Street Address (If Available): **14385 West Port Arthur Road**

City: **Beaumont**, State: **TX** Zip Code: **77705**

County: **Jefferson**

Telephone Number: **409-981-5052** Charter Number: **803002582**

If the application is submitted on behalf of a corporation, please identify the Charter Number as recorded with the Office of the Secretary of State for Texas.

B. Facility Contact

1. List those persons or firms who will act as primary contact for the applicant during the processing of the permit application. Also indicate the capacity in which each person may represent the applicant (engineering, legal, etc.). The person listed first will be the primary recipient of correspondence regarding this application. Include the complete mailing addresses and phone numbers.

Brenda Neely – Site Director
BASF Agricultural Solutions US LLC
14385 West Port Arthur Road
Beaumont, TX 77705
Phone: 409-981-5139
Email: [REDACTED]

Kendra Derrick – EHS Specialist
BASF Agricultural Solutions US LLC
14385 West Port Arthur Road
Beaumont, TX 77705
Phone: 409-249-8574
Email: [REDACTED]

2. If the application is submitted by a corporation or by a person residing out of state, the applicant must register an Agent in Service or Agent of Service with the Texas Secretary of State's office and provide a complete mailing address for the agent. The agent must be a Texas resident.

C.T. Corporation
1999 Bryan Street, Suite 900
Dallas, TX 75201-3136
214-979-1172

C. Operator²: Identify the entity who will conduct facility operations.

Operator Name: **BASF Agricultural Solutions US LLC**

Address: **2 TW Alexander Drive**

² The operator has the duty to submit an application if the facility is owned by one person and operated by another [30 TAC 305.43(b)]. The permit will specify the operator and the owner who is listed on this application [Section 361.087 Texas Health and Safety Code].

City: Research Triangle Park, State: NC Zip Code: 27713

Telephone Number: 984-287-2800 Charter Number: 803002582

D. Owner

1. Indicate the ownership status of the facility:

a. Private X

- (1) X Corporation
- (2) _____ Partnership
- (3) _____ Proprietorship
- (4) _____ Non-profit organization

b. Public _____

- (1) _____ Federal
- (2) _____ Military
- (3) _____ State
- (4) _____ Regional
- (5) _____ County
- (6) _____ Municipal
- (7) _____ Other (specify)

2. Does the operator own the facility units and facility property?

☒ Yes ☐ No

If you checked "no",

- a. Submit as "Attachment A" a copy of the lease for use of or the option to buy said facility units and/or facility property, as appropriate; and
- b. Identify the facility units' owner(s) and/or facility property owner(s). Please note that the owner(s) is/are required to sign the application on page 5.

Owner Name: BASF Agricultural Solutions US LLC

Address: 2 TW Alexander Drive

City: Research Triangle Park, State: NC Zip Code: 27713

Telephone Number: 984-287-2800

Owner Name: _____

Address: _____

City: _____, State: _____ Zip Code: _____

Telephone Number: _____

E. Type of Application Submittal:

Initial _____ or Revision **X (Renewal Application)**

F. Registration and Permit Information

Indicate (by listing the permit number(s) in the right-hand column below) all existing or pending State and/or Federal permits or construction approvals which pertain to pollution control or industrial solid waste management activities conducted by your plant or at your location. Complete each blank by entering the *permit number*, or the *date of application*, or "none".

| Relevant Program and/or Law | Permit No. | Agency* |
|--|---|---------------------|
| 1. Texas Solid Waste Disposal Act | SWR 30053 | TCEQ |
| 2. Wastewater disposal under the Texas Water Code | WQ0001169000 | TCEQ |
| 3. Underground injection under the Texas Water Code | WDW-155, WDW-201 WDW-301, WDW-302 WDW-433, WDW-434 PIU-30053 | TCEQ |
| 4. Texas Clean Air Act | 20057, 978B, 113174, 151935, 152562, 157151, 157585, 158173, 158481, 164582, 173963, JE0113D | TCEQ |
| 5. Texas Uranium Surface Mining & Reclamation Act | None | |
| 6. Texas Surface Coal Mining & Reclamation Act | None | |
| 7. Hazardous Waste Management program under the Resource Conservation and Recovery Act | 50219 TXD067261412 | TCEQ EPA |
| 8. UIC program under the Safe Drinking Water Act | None | |
| 9. TPDES program under the Clean Water Act | TX0003671 | EPA |
| 10. PSD program under the Clean Air Act | None | |
| 11. Nonattainment program under the Clean Air Act | None | |
| 12. National Emission Standards for Hazardous Pollutants (NESHAP) Pre-construction | None | |

approval under the Clean Air Act

- | | |
|--|-------------|
| 13. Ocean dumping permits under the Marine Protection Research and Sanctuaries Act | None |
| 14. Dredge or fill permits under section 404 of the Clean Water Act | None |
| 15. Other relevant environmental permits | None |

*Use the following acronyms for each agency as shown below:

| | |
|-------|---|
| TCEQ | = Texas Commission on Environmental Quality |
| TRC | = Texas Railroad Commission |
| TDH | = Texas Department of Health |
| TDA | = Texas Department of Agriculture |
| EPA | = U.S. Environmental Protection Agency |
| CORPS | = U.S. Army Corps of Engineers |

G. Give a brief description of the nature of your business.

Manufacture of agricultural chemicals.

H. TCEQ Core Data Form

The TCEQ requires that a Core Data Form (Form 10400) be submitted on all incoming applications. For more information regarding the Core Data Form, call (512) 239-1575 or go to the TCEQ website at http://www.tceq.texas.gov/permitting/central_registry/guidance.html.

See Attachment 1 – Core Data Form

Signature Page

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Operator Signature: _____ Date: _____

Name and Official Title (type or print): **Brenda L Neely, Site Director**

Operator Signature: _____ Date: _____

Name and Official Title (type or print): _____

Operator Signature: _____ Date: _____

Name and Official Title (type or print): _____

Owner Signature: _____ Date: _____

Name and Official Title (type or print): _____

To be completed by the operator if the application is signed by an authorized representative for the operator

I, _____ hereby designate _____
(operator) (authorized representative)

as my representative and hereby authorize said representative to sign any application, submit additional information as may be requested by the Commission; and/or appear for me at any hearing or before the Texas Commission on Environmental Quality in conjunction with this request for a Texas Water Code or Texas Solid Waste Disposal Act permit. I further understand that I am responsible for the contents of this application, for oral statements given by my authorized representative support of the application, and for compliance with the terms and conditions of any permit which might be issued based upon this application.

Printed or Typed Name of Operator or Principal Executive Officer

Signature

(Note: Application Must Bear Signature & Seal of Notary Public)

Subscribed and sworn to before me by the said **Brenda L Neely** on this

_____ day of _____, _____.

My commission expires of the _____ day of _____, _____

Notary Public in and for _____ County, Texas

II. Facility Background Information

A. Location of Facility for which the application is submitted

1. Give a description of the location of the facility site with respect to known or easily identifiable landmarks.

Approximately two miles (straight distance) northwest of the Jefferson County Airport on West Port Arthur Road.

2. Detail the access routes from the nearest U.S. or State Highway to the facility.

Entry to the facility is off of the west side of West Port Arthur Road approximately 2.5 miles north of the intersection of Highway 365 and West Port Arthur Road.

3. Enter the geographical coordinates of the facility:

Latitude: 29 deg 58 min 18 sec

Longitude: 94 deg 03 min 13 sec

4. Is the facility located on Indian lands?

☐ Yes ☒ No

B. Legal Description of Facility

Submit as "Attachment B" a legal description(s) of the tract or tracts of land upon which the waste management operations referred to in this permit application occur or will occur. Although a legal description is required, a metes and bounds description is not necessary for urban sites with appropriate "lot" description(s). A survey plat or facility plan drawing which shows the specific points referenced in the survey should also be included in Attachment B.

See Attachment B

C. SIC Codes

List, in descending order of significance, the four digit standard industrial classification (SIC) codes which best describe your facility in terms of the principal products or services you produce or provide. Also, specify each classification in words. These classifications may differ from the SIC codes describing the operation generating the hazardous wastes.

| 4-digit SIC Code | Description |
|------------------|---------------------------------------|
| 2869 | Industrial Organic Chemicals |
| 2879 | Pesticides and Agricultural Chemicals |
| | |
| | |

SIC code numbers are descriptions which may be found in the Standard Industrial Classification Manual prepared by the Executive Officer of the President, Office of Management and Budget, which is available from the Government Printing Office, Washington, D.C. Use the current edition of the manual.

III. Wastes and Waste Management

A. Waste Generation and Management Activities

Is any hazardous waste [see Title 40, Code of Federal Regulations (CFR), Part 261] presently or proposed to be generated or received at your facility?

☒ Yes ☐ No

If no, skip to question Number 2 below.

If yes, answer the following question.

1. Are you presently registered with TCEQ as a solid waste generator?

☒ Yes ☐ No ☐ Pending

If no, contact the Industrial and Hazardous Waste Division of TCEQ in Austin, Texas to obtain registration information. Also, continue with the application form (go to Number 2 below).

If yes, go to Section I of your TCEQ Notice of Registration, determine which of your wastes are hazardous, and list these wastes (and mixtures) in Table III-1 (see Number 2 below).

2. Complete Table III-1, Hazardous Wastes and Management Activities, below, listing all hazardous wastes, all mixtures containing any hazardous wastes, and hazardous debris which were, are presently, or are proposed to be handled at your facility in interim status or permitted units. See 40 CFR 261 and 268.2, attaching additional copies as necessary.

Note that Table III-1 includes only the waste codes for the wastes managed in the existing and active permitted tanks listed in Table III-2. The facility manages other hazardous and non-hazardous wastes as listed on the facility's Notice of Registration; however, hazardous wastes are only managed in permit-exempt units and not in permitted units. Note that the existing and active permitted tanks listed in Table III-2 only manage non-hazardous wastes.

Guidelines for the Classification & Coding of Industrial Wastes and Hazardous Wastes, TCEQ publication RG-22, contains guidance on how to properly classify and code industrial waste and hazardous waste in accordance with 30 TAC 335.501-335.515 (Subchapter R).

If you are not registered with TCEQ, enter "NA" for TCEQ Waste Code Number.

For the EPA Hazardous Waste Numbers, see 40 CFR 261.20-33. For annual quantity, provide the amount in units of pounds (as generated and/or received) for each waste and/or waste mixture.

B. Waste Management Units Summary

1. For each waste and waste mixture listed in Table III-1 that is stored, processed, and/or disposed on-site (except where such storage and/or processing is excluded from permit requirements in accordance with Texas Administrative Code (TAC) Section 335), complete Table III-2, Hazardous

Waste Management Unit Checklist, and enter the name of each hazardous waste management unit (Note: Please make copies of Table III-2 if necessary).

Give the design capacity of each hazardous waste management unit in any of the units of measure shown. In the case of inactive or closed units for which design details are unavailable, an estimate of the design capacity is sufficient.

Please provide a description for each waste management unit described in your own words on the line provided for "Waste Management Unit."

2. Has the applicant at any time conducted the on-site disposal of industrial solid waste now identified or listed as hazardous waste?

☐ Yes ☒ No

If yes, complete Table III-2 indicating the hazardous waste management units which were once utilized at your plant site but are no longer in service (i.e., inactive or closed facility units).

If no, and if no hazardous waste is presently or proposed to be stored [for longer than 90 days (see 30 TAC Section 335.53)], processed, or disposed of at your facility, then you need not file this permit application. Otherwise proceed with the application form.

3. Provide an estimate of the total weight (lbs) of hazardous waste material that has been disposed of and/or stored within your site boundaries and not removed to another site.

C. Location of Waste Management Units

1. Submit as "Attachment C" a drawn-to-scale topographic map (or other map if a topographic map is unavailable) extending one mile beyond the facility boundaries, depicting the following:
 - a. The approximate boundaries of the facility (described in Section II.B) and within these boundaries, the location and boundaries of the areas occupied by each active, inactive, and proposed hazardous waste management unit (see Table III-2). Each depicted area should be labeled to identify the unit(s), unit status (i.e., active, inactive, or proposed), and areal size in acres.
 - b. The overall facility and all surface intake and discharge structures;
 - c. All on-site injection wells where liquids are injected underground;
 - d. All known monitor wells and boreholes within the property boundaries of the facility; and
 - e. All wells, springs, other surface water bodies, and drinking water wells listed in public records or otherwise known to the applicant within the map area and the purpose for which each water well is used (e.g., domestic, livestock, agricultural, industrial, etc.).
2. Submit as "Attachment D" photographs which clearly delineate all hazardous waste management storage, processing, and disposal units, as well as sites of future storage, processing and disposal units.

D. Flow Diagram/Description

Show as "Attachment E" process flow diagrams and step-by-step word descriptions of the process flow, depicting the handling, collection, storage, processing, and/or disposal of each of the hazardous wastes previously listed in this application.

The flow diagrams or descriptions should include the following information:

1. Originating point of each waste and waste classification code;
2. Means of conveyance utilized in every step of the process flow;
3. Name and function of each facility component through which the waste passes;
4. The ultimate disposition of all wastes (if off-site, specify "off-site") and waste residues.

IV. Index Of Attachments

List and index below all attachments to this application and indicate if included or not included:

| Item | Attachments | Attachment | Included | Not Included |
|---------|---|------------|----------|--------------|
| I.D.2.a | Lease/Option to buy | A | | X |
| II.B | Site legal description | B | X | |
| III.C.1 | Facility boundaries and adjacent waters map | C | X | |
| III.C.2 | Photographs | D | X | |
| III.D | Process flow diagram/description | E | X | |

Table III-1 – Hazardous Wastes and Management Activities

| Verbal Description of Waste | TCEQ Waste for Code and Classification Code | EPA Hazardous Waste Number | Storage ¹ of Wastes Received from Off-Site | Processing ² of Wastes Received from Off-Site | Disposal of Wastes Received from Off-Site | Storage ¹ of Wastes Generated On-Site | Processing ² of Wastes Generated On-Site | Disposal of Wastes Generated On-Site | Annual Quantity Generated and/or Received |
|--|---|--|---|--|---|--|---|--------------------------------------|---|
| DMTA Unit Wastewater | 20002071 | NA | | | | X | X | X | <1000 T |
| Wastewater from Dicamba processing unit | 70011011 | NA | | X | | X | X | X | <1000 T |
| Wastes below were previously managed in closed permitted units. ³ | | | | | | | | | |
| Acute Lab Packs | 0001004H | D001, D001, P005, P024, P030, P106, P119, P120 | | | | X | | | <0.1 T |
| Contaminated Xylene-DCP Process Stream | 1004203H | D001, F003 | | | | X | | | <1000 T |
| Methanol and TCB | 1004203H | D001 | | | | X | | | <1000 T |
| Flammable mixture containing DEK, Methanol, MEK, HMP, Propanic Acid | 2001203H | D035, D001 | | | | X | | | 0 |
| MPP Lab Waste | 2020201H | D001, F003, F005 | | | | X | | | 0 |
| MPP Organic Waste | 3025201H | D001, D002, D003, F003, F005 | | | | X | | | 0 |

¹ "Storage" means the holding of solid waste for a temporary period, at the end of which the waste is processed, disposed of, or stored elsewhere.

² "Processing" means the extraction of materials, transfer, volume reduction, conversion to energy, or other separation and preparation of solid waste for reuse or disposal, including the treatment or neutralization of hazardous waste, designed to change the physical, chemical, or biological character or composition of any hazardous waste so as to neutralize such waste, or so as to recover energy or material from the waste or so as to render such waste non-hazardous or less hazardous; safer for transport, store or dispose of; or amenable for recovery, amenable for storage, or reduced in volume. The "transfer" of solid waste for reuse or disposal as used above, does not include the actions of a transporter in conveying or transporting solid waste by truck, ship, pipeline, or other means. Unless the Executive Director determines that regulation of such activity is necessary to protect human health or the environment, the definition of "processing" does not include activities relating to those materials exempted by the Resource Conservation and Recovery Act, 42 U.S.C. 6901 et seq., as amended.

³ Wastes listed were previously managed in closed permitted units.

| Verbal Description of Waste | TCEQ Waste for Code and Classification Code | EPA Hazardous Waste Number | Storage ¹ of Wastes Received from Off-Site | Processing ² of Wastes Received from Off-Site | Disposal of Wastes Received from Off-Site | Storage ¹ of Wastes Generated On-Site | Processing ² of Wastes Generated On-Site | Disposal of Wastes Generated On-Site | Annual Quantity Generated and/or Received |
|--|---|--|---|--|---|--|---|--------------------------------------|---|
| Toluene Contaminated Absorbents | 3027403H | F005, U161, U220 | | | | X | | | 0 |
| Waste Corrosive Chemicals | 4001105H | D002 | | | | X | | | <1 T |
| Frontier Liquid Organic Waste | 5001219H | D001, U122 | | | | X | | | 0 |
| HMP/DMTA Tars | 5010219H | D001 | | | | X | | | 0 |
| Lab Packs | 6012003H | D001, D002, D003, D008, D018, U001, U188 | | | | X | | | <1 T |
| Sample Waste (lab analytical waste) | 6027201H | D001, D002, D018, D022, F003, F005 | | | | X | | | <1 T |
| Flammable Liquids, including haz. Tank bottoms | 9036219H | D001, D018, F003, F005 | | | | X | X | | <100 T |
| Other Waste Inorganic Solids | 9037319H | D009 | | | | X | | | <0.1 T |
| Elemental Mercury | 9042319H | D009 | | | | X | | | <0.1 T |
| Out-Dated Chemicals | 9045203H | D001 | | | | X | | | <0.1 T |
| Waste Gas Cylinders | 9046801H | D001 | | | | X | | | <0.1 T |
| Aerosols | 9047219H | D001, D003 | | | | X | | | <1000 T |
| Old Akzo Nobel C5809 | 9048219H | D001 | | | | X | | | <0.1 T |
| MPP Organic Wastewater | 9063219H | D001 | | | | X | | | 0 |
| Hydrogen Peroxide | 9096105H | D001, D002 | | | | X | | | <0.1 T |
| Thionic waste from DMTA Unit | 9087204H | D001 | | | | X | | | <100 T |
| Waste Dimethylamine | 9121219H | D001, D002 | | | | X | | | <100 T |
| Waste Neutral Oils | 9125609H | D001, D002 | | | | X | | | <10 T |
| Hazardous DCP Production Waste | 9128208H | D041, D042 | | | | X | | | <2000 T |

| Verbal Description of Waste | TCEQ Waste for Code and Classification Code | EPA Hazardous Waste Number | Storage ¹ of Wastes Received from Off-Site | Processing ² of Wastes Received from Off-Site | Disposal of Wastes Received from Off-Site | Storage ¹ of Wastes Generated On-Site | Processing ² of Wastes Generated On-Site | Disposal of Wastes Generated On-Site | Annual Quantity Generated and/or Received |
|---|---|----------------------------|---|--|---|--|---|--------------------------------------|---|
| Hazardous Contaminated Soil from Spill Cleanup | 9129409H | D018 | | | | X | | | <100 T |
| Waste Diesel Material | 9156219H | D001 | | | | X | | | <10 T |
| MPP and DMTA High TDS Wastewater | 113H | D001, D002, F003, F005 | | | | X | | | <1000 T |
| DMTA and Dicamba Acidic Wastewater | 105H | D001, D002 | | | | X | | | <1000 T |
| DCP Isomers | 1001208H | U081 | | | | X (inactive) | X (inactive) | | 0 |
| Heptane/Dienochlor Organic Waste | 2017219H | D001, U130 | | | | X (inactive) | | | 0 |
| Chlorinated Acrylonitrile Waste | 2018219H | D001, U009 | | | | X (inactive) | | | 0 |
| Aqueous Waste with Cyanides | 2019102H | D003 | | | | X (inactive) | | | 0 |
| Discarded Chemicals | 2021207H | D001, D002 | | | | X (inactive) | | | 0 |
| Toluene | 2023203H | D001, U220 | | | | X (inactive) | | | 0 |
| Sulfuric Acid | 3001104H | D002 | | | | X (inactive) | | | 0 |
| Solvent Mixture Contaminated with Pesticides & Herbicides | 3026204H | D001, D002, U220 | | | | X (inactive) | | | 0 |
| Organic Mixture from MPP Line Clean Out | 3034219H | D001 | | | | X (inactive) | | | 0 |
| Methyl Tert Butyl Ether and Methanol | 3039219H | D001 | | | | X (inactive) | | | 0 |
| Fiber Filters Containing Hydrazinehydrate | 3040405H | D002, D003 | | | | X (inactive) | | | 0 |
| Used Hydrazine Hydrate Solution | 3041119H | D002, U133 | | | | X (inactive) | | | 0 |
| MPP Filter Socks | 3042108H | D002 | | | | X (inactive) | | | 0 |
| Contaminated Water | 4002102H | D035, F003, F005, U002, | | | | X (inactive) | X (inactive) | | 0 |

| Verbal Description of Waste | TCEQ Waste for Code and Classification Code | EPA Hazardous Waste Number | Storage ¹ of Wastes Received from Off-Site | Processing ² of Wastes Received from Off-Site | Disposal of Wastes Received from Off-Site | Storage ¹ of Wastes Generated On-Site | Processing ² of Wastes Generated On-Site | Disposal of Wastes Generated On-Site | Annual Quantity Generated and/or Received |
|---|---|--|---|--|---|--|---|--------------------------------------|---|
| | | U081, U159, U220, U226, U239 | | | | | | | |
| HMK Waste | 5002219H | D001 | | | | X (inactive) | | | 0 |
| Storage Tank Rinse Water | 5009219H | D018 | | | | X (inactive) | | | 0 |
| Treatment Chemicals | 7009110H | D001, D002 | | | | X (inactive) | | | 0 |
| Paint Thinner or Petroleum Distillates | 8013211H | D001, D035, F003, F005 | | | | X (inactive) | | | 0 |
| Non-Halogenated Solvents | 8036203H | D001 | | | | X (inactive) | | | 0 |
| Paint - Ink Remover | 8038112H | D007 | | | | X (inactive) | | | 0 |
| Halogenated/Non-Halogenated Solvent Mixture | 9023204H | D001, D035, F003, F005, U154, U220, U239 | | | | X (inactive) | | | 0 |
| Off-Spec Herbicide Product | 9040402H | U240 | | | | X (inactive) | | | 0 |
| Concrete Piping Debris | 9041319H | D009 | | | | X (inactive) | | | 0 |
| Out Dated Tetra Methoxypropane | 9044203H | D001 | | | | X (inactive) | | | 0 |
| DMA Waste | 9052219H | D001, D002 | | | | X (inactive) | | | 0 |

Table III-2 – Hazardous Waste Management Unit Checklist

| Waste Management Unit | TCEQ N.O.R. Unit # | Status¹ | Design Capacity² | Number of Years Utilized | Date in Service |
|------------------------------|---------------------------|---------------------------|------------------------------------|---------------------------------|------------------------|
| Tank J-516 | 032 | Closed | 20,000 gallons | 13 | 1990 to 2003 |
| Tank J-519 | 033 | Closed | 6,000 gallons | 10 | 1993 to 2003 |
| Tank B-521 | 034 | Closed | 2,000 gallons | 13 | 1990 to 2003 |
| Tank B-503 | 035 | Closed | 1,000 gallons | 13 | 1990 to 2003 |
| Thermal Process Unit H-507 | 036 | Closed | 15 x 10 ⁶ BTUs/hr | 13 | 1990 to 2003 |
| Tank F-414A | 042 | Active³ | 196,202 gallons | 35 | 1990 to present |
| Tank WB-1767 | 061 | Active³ | 150,000 gallons | 35 | 1990 to present |
| Tank F-414B | 042 | Active³ | 197,000 gallons | 35 | 1990 to present |
| Tank F-414C | 069 | Active³ | 197,000 gallons | 35 | 1990 to present |
| Tank WB-502A | 073 | Active³ | 1,000,000 gallons | 35 | 1990 to present |
| Tank WB-502B | 074 | Active³ | 1,000,000 gallons | 35 | 1990 to present |
| Tank WB-1765 | 071 | Active³ | 1,000,000 gallons | 35 | 1990 to present |
| | | | | | |
| | | | | | |
| | | | | | |
| | | | | | |
| | | | | | |
| | | | | | |
| | | | | | |
| | | | | | |

¹ Indicate only one of the following: Active, Inactive, Closed, or Proposed

² Cubic yards, gallons, pounds, gallons/minute, pounds/hour, BTUs/hour, etc.

³ **Tank is in non-hazardous waste service associated with a UIC pre-injection unit.**

Technical NOD 1 Response
Hazardous Waste Permit Renewal Application

BASF Agricultural Solutions US LLC, Beaumont, Texas
Hazardous Waste Permit No. 50219

| |
|--|
| Core Data Form (Response to T1) |
|--|



TCEQ Core Data Form

For detailed instructions on completing this form, please read the Core Data Form Instructions or call 512-239-5175.

SECTION I: General Information

| | | |
|---|---|--|
| 1. Reason for Submission (If other is checked please describe in space provided.) | | |
| <input type="checkbox"/> New Permit, Registration or Authorization (Core Data Form should be submitted with the program application.) | | |
| <input type="checkbox"/> Renewal (Core Data Form should be submitted with the renewal form) | | <input checked="" type="checkbox"/> Other Legal entity change |
| 2. Customer Reference Number (if issued) | Follow this link to search for CN or RN numbers in Central Registry** | 3. Regulated Entity Reference Number (if issued) |
| CN 605566066 | | RN 100634922 |

SECTION II: Customer Information

| | | | | | |
|---|------------------------|--|----|---|---|
| 4. General Customer Information | | 5. Effective Date for Customer Information Updates (mm/dd/yyyy) | | 11/1/2025 | |
| <input checked="" type="checkbox"/> New Customer <input checked="" type="checkbox"/> Update to Customer Information <input type="checkbox"/> Change in Regulated Entity Ownership <input type="checkbox"/> Change in Legal Name (Verifiable with the Texas Secretary of State or Texas Comptroller of Public Accounts) | | | | | |
| <i>The Customer Name submitted here may be updated automatically based on what is current and active with the Texas Secretary of State (SOS) or Texas Comptroller of Public Accounts (CPA).</i> | | | | | |
| 6. Customer Legal Name (If an individual, print last name first: eg: Doe, John) | | | | <i>If new Customer, enter previous Customer below:</i> | |
| BASF Agricultural Solutions US LLC | | | | BASF Corporation | |
| 7. TX SOS/CPA Filing Number | | 8. TX State Tax ID (11 digits) | | 9. Federal Tax ID (9 digits) | 10. DUNS Number (if applicable) |
| 0803002582 | | 32067010002 | | | 11-683-3577 |
| 11. Type of Customer: | | <input type="checkbox"/> Corporation | | <input type="checkbox"/> Individual | Partnership: <input checked="" type="checkbox"/> General <input type="checkbox"/> Limited |
| Government: <input type="checkbox"/> City <input type="checkbox"/> County <input type="checkbox"/> Federal <input type="checkbox"/> Local <input type="checkbox"/> State <input type="checkbox"/> Other | | <input type="checkbox"/> Sole Proprietorship | | <input type="checkbox"/> Other: | |
| 12. Number of Employees | | | | 13. Independently Owned and Operated? | |
| <input type="checkbox"/> 0-20 <input type="checkbox"/> 21-100 <input checked="" type="checkbox"/> 101-250 <input type="checkbox"/> 251-500 <input type="checkbox"/> 501 and higher | | | | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No | |
| 14. Customer Role (Proposed or Actual) – as it relates to the Regulated Entity listed on this form. Please check one of the following | | | | | |
| <input type="checkbox"/> Owner <input type="checkbox"/> Operator <input checked="" type="checkbox"/> Owner & Operator <input type="checkbox"/> Other: <input type="checkbox"/> Occupational Licensee <input type="checkbox"/> Responsible Party <input type="checkbox"/> VCP/BSA Applicant | | | | | |
| 15. Mailing Address: | | 2TW Alexander Drive | | | |
| | | | | | |
| City | Research Triangle Park | State | NC | ZIP | 27713 |
| | | | | ZIP + 4 | |
| 16. Country Mailing Information (if outside USA) | | | | 17. E-Mail Address (if applicable) | |
| | | | | | |
| 18. Telephone Number | | 19. Extension or Code | | 20. Fax Number (if applicable) | |
| | | | | | |

SECTION III: Regulated Entity Information

| | | | | | | | | |
|---|---------------------------|----------|--------------|----|------------|-------|----------------|------|
| 21. General Regulated Entity Information (If 'New Regulated Entity' is selected, a new permit application is also required.) | | | | | | | | |
| <input type="checkbox"/> New Regulated Entity <input type="checkbox"/> Update to Regulated Entity Name <input checked="" type="checkbox"/> Update to Regulated Entity Information | | | | | | | | |
| <i>The Regulated Entity Name submitted may be updated, in order to meet TCEQ Core Data Standards (removal of organizational endings such as Inc, LP, or LLC).</i> | | | | | | | | |
| 22. Regulated Entity Name (Enter name of the site where the regulated action is taking place.) | | | | | | | | |
| BASF Beaumont Agro Plant | | | | | | | | |
| 23. Street Address of the Regulated Entity: (No PO Boxes) | 14385 West Port Arthur Rd | | | | | | | |
| | | | | | | | | |
| | City | Beaumont | State | TX | ZIP | 77705 | ZIP + 4 | 9290 |
| 24. County | Jefferson | | | | | | | |

If no Street Address is provided, fields 25-28 are required.

| | | | | | | | | |
|--|---------------------------|---|--------------|--|--------------------------------------|--|----------------|------|
| 25. Description to Physical Location: | | | | | | | | |
| 26. Nearest City | | | | | State | Nearest ZIP Code | | |
| | | | | | | | | |
| <i>Latitude/Longitude are required and may be added/updated to meet TCEQ Core Data Standards. (Geocoding of the Physical Address may be used to supply coordinates where none have been provided or to gain accuracy).</i> | | | | | | | | |
| 27. Latitude (N) In Decimal: | | 29.971667 | | | 28. Longitude (W) In Decimal: | | -94.053611 | |
| Degrees | Minutes | Seconds | Degrees | Minutes | Seconds | | | |
| | | | | | | | | |
| 29. Primary SIC Code (4 digits) | | 30. Secondary SIC Code (4 digits) | | 31. Primary NAICS Code (5 or 6 digits) | | 32. Secondary NAICS Code (5 or 6 digits) | | |
| 2879 | | 2869 | | 325320 | | 325199 | | |
| 33. What is the Primary Business of this entity? (Do not repeat the SIC or NAICS description.) | | | | | | | | |
| Chemical manufacturing of ag products | | | | | | | | |
| 34. Mailing Address: | 14385 West Port Arthur Rd | | | | | | | |
| | | | | | | | | |
| | City | Beaumont | State | TX | ZIP | 77705 | ZIP + 4 | 9290 |
| 35. E-Mail Address: | | | | | | | | |
| 36. Telephone Number | | | | 37. Extension or Code | | 38. Fax Number (if applicable) | | |
| (409) 981-5000 | | | | 5139 | | () - | | |

39. TCEQ Programs and ID Numbers Check all Programs and write in the permits/registration numbers that will be affected by the updates submitted on this form. See the Core Data Form instructions for additional guidance.

| | | | | |
|--|--|---|---|--|
| <input type="checkbox"/> Dam Safety | <input type="checkbox"/> Districts | <input type="checkbox"/> Edwards Aquifer | <input checked="" type="checkbox"/> Emissions Inventory Air | <input checked="" type="checkbox"/> Industrial Hazardous Waste |
| | | | JE0113D | TXD067261412, 50219, 30053 |
| <input type="checkbox"/> Municipal Solid Waste | <input checked="" type="checkbox"/> New Source Review Air | <input type="checkbox"/> OSSF | <input type="checkbox"/> Petroleum Storage Tank | <input type="checkbox"/> PWS |
| | 20057, 978B, 113174, 151935, 152562, 157151, 157585, 158173, 158481, 164582, 173963, 177952 | | | |
| <input type="checkbox"/> Sludge | <input checked="" type="checkbox"/> Storm Water | <input type="checkbox"/> Title V Air | <input type="checkbox"/> Tires | <input type="checkbox"/> Used Oil |
| | TXR05DA48 | | | |
| <input type="checkbox"/> Voluntary Cleanup | <input checked="" type="checkbox"/> Wastewater | <input type="checkbox"/> Wastewater Agriculture | <input type="checkbox"/> Water Rights | <input checked="" type="checkbox"/> Other: UIC |
| | TX0003671, WQ0001169000 | | | WDW155, WDW201, WDW301, WDW302, WDW433, WDW434 |

SECTION IV: Preparer Information

| | | | |
|-----------------------------|----------------------|-----------------------|---------------------------|
| 40. Name: | Kendra Derrick | 41. Title: | EHS Specialist |
| 42. Telephone Number | 43. Ext./Code | 44. Fax Number | 45. E-Mail Address |
| (409) 249-8574 | | () - | |

SECTION V: Authorized Signature

46. By my signature below, I certify, to the best of my knowledge, that the information provided in this form is true and complete, and that I have signature authority to submit this form on behalf of the entity specified in Section II, Field 6 and/or as required for the updates to the ID numbers identified in field 39.

| | | | |
|-------------------------|------------------------------------|-------------------|-------------------|
| Company: | BASF Agricultural Solutions US LLC | Job Title: | Site Manager |
| Name (In Print): | Brenda L Neely | Phone: | (409) 981- 5139 |
| Signature: | | Date: | |

**Technical NOD 1 Response
Hazardous Waste Permit Renewal Application**

BASF Agricultural Solutions US LLC, Beaumont, Texas
Hazardous Waste Permit No. 50219

**Part B, Section I – Table I
(Response to T2)**

Table I: General Information**A. Applicant: Facility Operator**

| | |
|--|------------------------------------|
| Name ¹ | BASF Agricultural Solutions US LLC |
| Address ² | 14385 West Port Arthur Road |
| City, State ² | Beaumont, Texas |
| Zip Code ² | 77705 |
| Telephone Number | 409-981-5052 |
| Alternate Telephone Number | |
| TCEQ Solid Waste Registration No. | 30053 |
| EPA I.D. No. | TXD067261412 |
| Permit No. | 50219 |
| County | Jefferson |
| Regulated Entity Name | BASF Beaumont Agro Plant |
| Regulated Entity Reference Number (RN) | 100634922 |
| Customer Name ² | BASF Agricultural Solutions US LLC |
| Customer Reference Number: | 605566066 |
| Charter Number ³ | 803002582 |
| Previous or Former Names of the Facility (if applicable) | |

B. Facility Owner: Identify the Facility Owner if different than the Facility Operator⁴
☒ Same as Facility Operator?

| | |
|----------------------------|------------------------------------|
| Name | BASF Agricultural Solutions US LLC |
| Address | 14385 West Port Arthur Road |
| City, State | Beaumont, Texas |
| Zip Code | 77705 |
| Telephone Number | 409-981-5052 |
| Alternate Telephone Number | |

C. Facility Contact

1. Persons or firms who will act as primary contact:

| | |
|----------------------------|-----------------------------|
| Name, Title: | Brenda Neely, Site Director |
| Address | 14385 West Port Arthur Road |
| City, State: | Beaumont, Texas |
| Zip Code | 77705 |
| Telephone Number | 409-981-5139 |
| Alternate Telephone Number | |
| E-mail | |

Persons or firms who will act as primary contact (if more than one):

| | |
|----------------------------|----------------------------------|
| Name, Title: | Kendra D Derrick, EHS Specialist |
| Address | 14385 West Port Arthur Road |
| City, State: | Beaumont, Texas |
| Zip Code | 77705 |
| Telephone Number | 409-249-8574 |
| Alternate Telephone Number | |
| E-mail | |

2. Agent in Service or Agent of Service (if you are an out-of-state company)⁵:

| | |
|--------------|------------------------------|
| Name, Title: | C.T. Corporation |
| Address | 1999 Bryan Street, Suite 900 |
| City, State: | Dallas, Texas |
| Zip Code | 75201 |

3. Individual responsible for causing notice to be published:

| | |
|----------------------------|----------------------------------|
| Name: | Kendra D Derrick, EHS Specialist |
| Address | 14385 West Port Arthur Road |
| City, State: | Beaumont, Texas |
| Zip Code | 77705 |
| Telephone Number | 409-249-8574 |
| Alternate Telephone Number | |
| E-mail | |

4. Public place in county where application will be made available⁶:

| | |
|-------------|-------------------------------------|
| Name | Marion and Ed Hughes Public Library |
| Address | 2712 Nederland Avenue |
| City, State | Nederland, Texas |
| Zip Code | 77627 |

D. Application Type and Facility Status**1. Application Type**

- | | | |
|---|--|---|
| <input checked="" type="checkbox"/> Permit | <input checked="" type="checkbox"/> Amendment | <input type="checkbox"/> Modification |
| <input type="checkbox"/> New | <input checked="" type="checkbox"/> Major | <input type="checkbox"/> Class 3 |
| <input checked="" type="checkbox"/> Renewal | <input type="checkbox"/> Minor | <input type="checkbox"/> Class 2 |
| <input type="checkbox"/> Interim Status | | <input type="checkbox"/> Class 1 ¹ |
| <input type="checkbox"/> Compliance Plan | | <input type="checkbox"/> Class 1 |
| <input type="checkbox"/> RD&D | | |

2. Part of a Consolidated Permit Processing request? [30 TAC Chapter 33]

No

3. Does the application contain confidential material?⁷

No

4. Facility Status. Check all that apply

- | | |
|--|--|
| <input type="checkbox"/> Proposed | <input checked="" type="checkbox"/> On-Site |
| <input checked="" type="checkbox"/> Existing | <input type="checkbox"/> Off-site |
| | <input type="checkbox"/> Commercial |
| | <input type="checkbox"/> Recycle |
| | <input type="checkbox"/> Land Disposal |
| | <input type="checkbox"/> Areal or capacity expansion |
| | <input checked="" type="checkbox"/> Compliance plan |

5. Is the facility within the Coastal Management Program boundary?

Yes

6. Description of Application Changes

Complete Table I.1 - Description of Proposed Application Changes

Note: List all changes requested in Table. Unlisted requests risk remaining unaddressed or possibly denied if brought to the permit application reviewer's attention at a later time.

7. Total acreage of the facility being permitted:

490

8. Identify the name of the drainage basin and segment where the facility is located⁸

| | |
|---------------|------------------------------|
| River Segment | Taylor Bayou |
| River Basin | Neches-Trinity Coastal Basin |

E. Facility Siting Summary:

Is the facility located or proposed to be located:

| | |
|---|-----|
| 1. Within a 100-year floodplain? | No |
| 2. in wetlands? | Yes |
| 3. In the critical habitat of an endangered species of plant or animal? | No |
| 4. On the recharge zone of a sole-source aquifer? | No |
| 5. In an area overlying a regional aquifer? | Yes |
| 6. Withing 0.5 mile (2,640 feet) of an established residence, church, school , day care center, surface water body used for public drinking water supply, or dedicated public park? ⁹ [30 TAC 335.202] If Yes: the TCEQ shall not issue a permit for this facility. | No |
| 7. In an area in which the governing body of the country or municipality has prohibited the processing or disposal of municipal hazardous waste or industrial solid waste? If yes: provide a copy of the ordinance or order. | No |

F. Wastewater and Stormwater Disposition

| | |
|---|-----|
| 1. Is the disposal of any waste to be accomplished by a waste disposal well at this facility? | Yes |
|---|-----|

If Yes: List WDW Permit No(s):

155, 201, 301, 302, 433, 434

| | |
|---|----|
| 2. Will any point source discharge of effluent or rainfall runoff occur as a result of the proposed activities? | No |
|---|----|

3. If Yes, is this discharge regulated by a TPDES or TCEQ permit?

☐ Yes

TCEQ Permit No.

TPDES Permit No.

☐ No

Date TCEQ discharge permit application filed:

Date TPDES discharge application filed:

G. Information Required to Provide Notice

State Officials List [30 TAC 39]

State Senator

| | |
|--------------|---------------------------|
| Name: | Robert Nichols [REDACTED] |
| Address | 329 Neches Street |
| City, State: | Jacksonville, Texas |
| Zip Code: | 75766 |

State Representative

| | |
|--------------|------------------------|
| Name: | Dade Phelan [REDACTED] |
| Address | 812 North 16th Street |
| City, State: | Orange, Texas |
| Zip Code | 78768 |

Local Officials List [30 TAC 39]

Mayor

| | |
|--------------|---------------------|
| Name: | Roy West [REDACTED] |
| Address | 801 Main Street |
| City, State: | Beaumont, Texas |
| Zip Code | 77701 |

Local Health Authority

| | |
|--------------|---------------------------------|
| Name: | Kenneth Coleman, Sr. [REDACTED] |
| Address | 3040 College Street |
| City, State: | Beaumont, Texas |
| Zip Code | 77701 |

County Judge

| | |
|--------------|-------------------------|
| Name: | Jeff Branick [REDACTED] |
| Address | 1149 Pearl Street |
| City, State: | Beaumont, Texas |
| Zip Code | 77701 |

County Health Authority

| | |
|--------------|-----------------------|
| Name: | Ezea Ede [REDACTED] |
| Address | 740 Hospital Dr. #230 |
| City, State: | Beaumont, Texas |
| Zip Code | 77701 |

Based on the questions in the Bilingual Notice Instructions for this form, are you required to make alternate (Bilingual) notice for this application?

Yes

Bilingual Language(s):

Spanish

TCEQ Core Data Form Submitted?(Required)

Yes

Has any information changed on the TCEQ Core Data Form since the last submittal?

No

Signature on Application Submitted?
(see Section I Instructions, Item c)

Yes

1. Individual, Corporation, or Other Legal Entity Name on the Permit - must match the Secretary of State's database records for the Facility).
2. The legal name and address must match the Core Data Form.
3. If the application is submitted on behalf of a corporation, please identify the Charter Number as recorded with the Office of the Secretary of State for Texas.
4. The operator has the duty to submit an application if the facility is owned by one person and operated by another [30 TAC 305.43(b)]. The permit will specify the operator and the owner who is listed on Part A of this application [Section 361.087, Texas Health and Safety Code].
5. If the application is submitted by a corporation or by a person residing out of state, the applicant register an Agent in Service or Agent of Service with the Texas Secretary of State's office and provide a complete mailing address for the agent. The agent must be a Texas resident.
6. For applications for new permits, renewals, major amendments and Class 3 modifications a copy of the administratively complete application must be made available at a public place in the county where the facility is, or will be, located for review and copying by the public. Identify the public place in the county (e.g., public library, county court house, city hall), including the address, where the application will be made available for review and copying by the public.
7. For confidential information cross-reference the confidential material throughout the application to Section XIII: Confidential Material, and submit as a separate Section XIII document or binder conspicuously marked "CONFIDENTIAL".
8. Use the segments line map created by [TCEQ GIS Team](#) to find the Segment Name and Basin Name.
9. Use only for a new commercial hazardous waste management facility or areal expansion of an existing hazardous waste management facility or unit of that facility as defined in 30 TAC 335.202.

**Technical NOD 1 Response
Hazardous Waste Permit Renewal Application**

BASF Agricultural Solutions US LLC, Beaumont, Texas
Hazardous Waste Permit No. 50219

**Part B, Section I – Table I.1
(Response to T2)**

Table I.1-Description of Proposed Application Changes

| Permit/Compliance Plan Application Appendix/Section | Brief Description of Proposed Change | Modification or Amendment Type | Supporting Regulatory Citation |
|--|---|--------------------------------|--------------------------------|
| Part A; Part B, Section II; Part B Section V; Part B Section VI; and Part B All Sections | Part A and Part B Administrative and Informational Changes | Minor Amendment | 30 TAC 305.62 |
| Part B, Section III | Inspection, Security, Personnel Training, and Contingency Plans | Major Amendment | 30 TAC 305.62 |
| Part A and Part B, Section I | Update ownership information and site contact person | Class 1-1 | 30 TAC 305.69(k)(a)(7) |
| | | | |

**Technical NOD 1 Response
Hazardous Waste Permit Renewal Application**

BASF Agricultural Solutions US LLC, Beaumont, Texas
Hazardous Waste Permit No. 50219

**Part A, Attachment B – Legal
Description (Response to T3)**

LEGAL DESCRIPTION OF PROPERTY

Tract I:

BEING a 200.00 acre tract, more or less, out of and a part of property conveyed to Socony Mobil Oil Company, Inc., by instruments recorded in Vol. 1255 page 168 and Vol. 1349 page 3, both of Deed Records of Jefferson County, Texas, and as shown on map or plat showing a survey of said property by Matt Racki, dated June 1960, said property being located in the W.N. SIGLER SURVEY, Abstract No. 48, Jefferson County, Texas, the said 200.00 acre tract being more fully described by metes and bounds as follows, to-wit:

FOR A LOCATIVE CORNER: an iron bolt in concrete in the Westerly right-of-way line of the West Port Arthur Road said point being the Northeast corner of that certain 210.60 acre tract conveyed to Louis M. Hebert by Deed recorded in Vol. 142 page 279 Deed Records of Jefferson County, Texas, being also the Northeast corner of that certain 41.35 acre tract described as "Second Tract" in the Deed from James P. Lee to Socony Mobil Oil Company, Inc. recorded in Vol. 1255 page 168 Deed Records of Jefferson County, Texas, and as shown on the map recorded in Vol. 1255 page 167 Deed Records of Jefferson County, Texas;

THENCE along the Westerly line of the West Port Arthur Road, South 27 deg. 30 min. East 1521.30 feet to a copper rod at the POINT OF BEGINNING for the 200.00 acre tract herein described;

THENCE North 89 deg. 59 min. West 2061.50 feet to an iron stake;

THENCE continuing North 89 deg. 59 min. West an additional 1024.20 feet to an iron stake for the Northwest corner of the 200.00 acre tract herein described;

THENCE parallel to the West Port Arthur Road, South 27 deg. 30 min. East 3183.40 feet to an iron stake for the Southwest corner of the 200.00 acre tract herein described, said point being 308.00 feet distant, measured at right angles from the Southerly line of a 341.17 acre tract out of the Seth Hebert 699.01 acres shown as Block 1 of the Hebert partition recorded in Vol. 519 page 573 Deed Records of Jefferson County, Texas, said 341.17 acre tract being described as "First Tract" in the said Deed from James P. Lee to Socony Mobil Oil Company, Inc. recorded in Vol. 1255 page 168 of said Deed Records of Jefferson County, Teas, and as shown on the map recorded in Vol. 1255 page 167 Deed Records of Jefferson County, Texas.

THENCE South 89 deg. 59 min. East 3085.70 feet to an iron stake in the Westerly line of the West Port Arthur Road, the Southeast corner of the 200.00 acre tract herein described, said point being 300.00 feet distant, measured at right angles, from the South line of that certain 30.59 acre tract described as "Seventh Tract" in the abovementioned Deed from James P. Lee to Socony Mobil Oil Company, Inc.;

THENCE along the Westerly line of said West Port Arthur Road, North 27 deg. 30 min. West 3183.40 feet to the PLACE OF BEGINNING;

LEGAL DESCRIPTION OF PROPERTY
(Continued)

SAVE AND EXCEPT that certain 0.0122 acre tract conveyed to Jefferson County by Deed dated 9-27-96 filed 10-10-96 under County Clerk's File No. 9631255 Official Public Records of Real Property of Jefferson County, Texas.

Tract II:

BEING that certain 290.577 acre tract out of the W.N. SIGLER LEAGUE, Abstract No. 48, Jefferson County, Texas, and being a part of the 341.17 acre "First Tract" and the 30.59 acre "Seventh Tract" of the Deed from James P. Lee to Socony Mobil Oil Company, Inc. as recorded in Vol. 1255 page 168 Deed Records of Jefferson County, Texas, said 290.577 acre tract being more fully described by metes and bounds as follows, to-wit:

COMMENCING at the Northwest corner of the W.N. Sigler League, Abstract No. 48;

THENCE East 30.00 feet to the East right-of-way line of Hebert Road (60.00 feet right-of-way);

THENCE South along said East right-of-way line 39 55.00 feet to a 1-1/2 inch pipe found for the Northwest corner of said 290.577 acre tract and said 341.17 acre "First Tract" and being the POINT OF BEGINNING;

THENCE North 84 deg. 43 min. 29 sec. East along the North line of the 341.17 acre "First Tract" and the South line of the Clarfey J. Hebert 210.60 acre tract which is described in the Deed from J.M. Hebert to Clarfey J. Hebert recorded in Vol. 142 page 327 Deed Records of Jefferson County, Texas, a distance of 2890.35 to a 1-1/2 inch pipe found for corner;

THENCE South 19 deg. 59 min. 29 sec. East a distance of 952.91 feet to a 5/8ths inch iron rod set for corner, said corner being on the Northerly line of a 200.00 acre tract Deed to Velsicol Chemical Company by Mobil Oil Corporation as recorded in Vol. 1811 page 458 Deed Records of Jefferson County, Texas;

THENCE along said Northerly line North 89 deg. 59 min. 00 sec. West a distance of 1024.20 feet to a 5/8ths iron rod set for corner, said corner being the Northwest corner of said 200.00 acre tract;

THENCE South 27 deg. 30 min. 00 sec. East along the Westerly line of said 200.00 acre tract, a distance of 3181.93 feet to a 5/8ths iron rod set for corner, said corner being the Southwest corner of said 200.00 acre tract;

THENCE South 89 deg. 59 min. 00 sec. East along the Southerly line of said 200.00 acre tract, a distance of 3085.70 feet to a 5/8ths inch iron rod found for corner, said corner being the Southeast corner of said 200.00 acre tract and being on the Westerly right-of-way of West Port Arthur Road (80.00 feet right-of-way) and the Easterly line of said 30.59 acre "Seventh Tract";

LEGAL DESCRIPTION OF PROPERTY (Continued)

THENCE South 27 deg. 30 min. 00 sec. East along the Westerly right-of-way of West Port Arthur Road a distance of 337.68 feet to a 1-1/2 inch pipe found for corner, said corner being the Southeast corner of said 290.577 acre tract and the Southeast corner of said 30.59 acre "Seventh Tract";

THENCE South 89 deg. 53 min. 46 sec. West along the Southerly line of said 290.577 acre tract and the Southerly line of said 30.59 acre "Seventh Tract", a distance of 2371.83 feet to a 1-1/2 inch ,pipe found for the Southwest corner of said 30.59 acre "Seventh Tract" and continuing along said bearing and Southerly line of said 290.577 acre tract for a total distance of 6889.99 feet to a 1-1/2 inch pipe found for the Southwest corner of said 290.577 acre tract, said corner also being the Southwest corner of said 341.17 acre "First Tract" and being on the Easterly right-of-way line of Hebert Road (60.00 feet right-of-way);

THENCE North 00 deg. 01 min. 23 sec. West along said Easterly right-of-way line of Hebert Road and the Westerly line of said 341.17 acre "First Tract" a distance of 3766.54 feet to the POINT OF BEGINNING and containing 290.577 acres, more or less.

NOTE: THE COMPANY DOES NOT REPRESENT THAT THE ABOVE ACREAGE OR SQUARE FOOTAGE CALCULATIONS ARE CORRECT.

**Technical NOD 1 Response
Hazardous Waste Permit Renewal Application**

BASF Agricultural Solutions US LLC, Beaumont, Texas
Hazardous Waste Permit No. 50219

**Part A, Attachments E.1 and E.2
(Response to T5)**

Waste Generation

Dicamba /
FFP Loading/Unit Loading Rack Area /
Formulation /
Other Unit sumps



DMTA / HMP /
Facility Stormwater / Sanitary System
Effluent



Off-Site Waste Receipt

WOD Processing Area



Truck Loading Area

Waste Storage and Processing

414 Tank Farm

F-414C

F-414B

F-414A

Valves
Normally
Closed

WB-1765

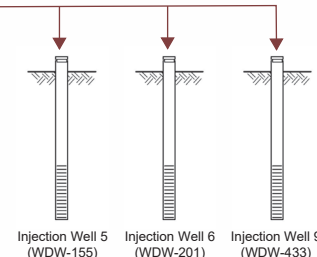
WB-502A

WB-502B

Million Gallon Tank Farm

WB-1767

Waste Disposal



Injection Well 7
(WDW-301)

Injection Well 8
(WDW-302)

LEGEND

- Facility wastewater and stormwater, except DMTA Unit
- - - → Dicamba wastewater recirculation to Million Gallon Tank Farm (Tanks WB-502 A/B)
- DMTA wastewater
- - - → DMTA wastewater recirculation to 414 Tank Farm
- Off-site waste from Tolling facility
- Waste to Injection Well
- Active UIC pre-injection tank
- Sump
- Valve

Notes:

- 1) See Attachment E.2 for notes to this waste flow diagram.
- 2) Only active Underground Injection Control (UIC) pre-injection tanks are shown in this waste flow diagram.
- 3) The UIC pre-injection tanks are used to store nonhazardous waste only for less than 90 days prior injection in UIC-permitted disposal wells.
- 4) The BASF Beaumont facility occasionally receives wastewater from other BASF facilities and a tolling facility (Jawhawk, Galena, Kansas) located more than 50 miles from the BASF Beaumont Agro Plant. That tolling facility processes BASF intermediate products and ships associated wastewater back to BASF via trucks in accordance with their agreement/contract without fee.



Texas Registration Number: F-1198

GSI Job No.: 10426

Drawn By: KCN

Issued: 14-Apr-2025

Chk'd By: KCN

Revised: 4-Sep-2025

Apr'd By: JMM

Scale: Not to scale

ATTACHMENT E.1

WASTE FLOW DIAGRAM

Hazardous Waste Permit Renewal Application

Hazardous Waste Permit No. 50219
BASF Beaumont Agro Plant, Beaumont, Texas

ATTACHMENT E.2 NOTES TO WASTE FLOW DIAGRAM

Hazardous Waste Permit Renewal Application

Hazardous Waste Permit No. 50219
BASF Beaumont Agro Plant, Beaumont, Texas

1.0 414 TANK FARM

1.1 Tanks F-414B and F-414C

Tanks F-414B and F-414C serve primarily as the first stage storage of the Dicamba commingled wastewater. This wastewater is sourced primarily from the Dicamba process unit, FFP loading rack, formulations, the WOD processing area (which also receives off-site wastewater), and the containment sumps at the F-414 Tank Farm. Water from tanks F-414B and F-414C is pumped through the WC-505 filters and to F-414A for storage before disposal via the Underground Injection Control (UIC)-permitted injection wells. Additionally, the F-414 tanks are configured such that wastewater can be recirculated between the tanks.

F-414A, F-414B and F-414C are registered on the facility's Notice of Registration (NOR) as wastewater storage tanks under the UIC program.

1.2 Tank F-414A

F-414A serves as the final wastewater storage tank prior to injection in UIC-permitted waste disposal wells WDW-155, WDW-201, and WDW-433 (also known as Injection Wells 5, 6, and 9, respectively). F-414A can also receive wastewater from Dicamba's main neutralization sump, B-248 if bypassing F-414B and C is needed.

2.0 MILLION GALLON TANK FARM

2.1 Tank WB-501 (Not Permitted)

WB-501 serves primarily as the first stage of storage for DMTA Unit wastewater generated in tank B-1757 and containment sumps at the Million Gallon Tank Area. Wastewater overflow from WB-501 is pumped to tank WB-502A or/and WB-502B (via overflow from WB-502A) for additional storage before disposal.

WB-1765, WB-501, WB-502A, and WB-502B are registered on the facility's NOR as elementary neutralization units.

2.2 Tanks WB-502A and WB-502B

WB-502A and WB-502B receive DMTA wastewater from tank WB-501. WB-502A and WB-502B are interconnected, allowing the co-mingling of wastewater between the two tanks. In the event that additional storage space is necessary due to an upset at the facility,

liquids are transferred to WB-502B. The wastewater from WB-502A and WB-502B is pumped to the WB-1765 outlet, and then to tank WB-1767 for final storage before disposal via injection wells.

2.3 Tank WB-1765

WB-1765 is used to collect wastewater before it is filtered and pumped to tank WB-1767, which serves as the final wastewater storage. WB-1765 is fed primarily from tank WB-501; however, WB-1765 can also receive aqueous waste from DMTA tank WB-1757. The tank also receives wastewater from containment sump WB-1747, as well as filter backwash stored in B-1746 via pump WA-1746.

3.0 TANK WB-1767

WB-1767 serves as the final DMTA wastewater storage tank and includes ancillary injection pumps A-1767A and A-1767B that feed UIC-permitted injection wells WDW-301 and WDW-302, which are also known as Injection Wells 7 and 8. The wastewater is produced mainly from the DMTA process and containment sumps at the Million Gallon Tank Area.

DMTA wastewater is pumped from the unit to WB-501. Overflow from WB-501 is pumped to WB-502A through the WC-501 filters, then to WB-1765, and finally pumped to WB-1767.

WB-1767 is listed on the facility's NOR as an injection well head tank under the UIC program.

**Technical NOD 1 Response
Hazardous Waste Permit Renewal Application**

BASF Agricultural Solutions US LLC, Beaumont, Texas
Hazardous Waste Permit No. 50219

**Part B, Section IV – Appendix IV.D Waste
Analysis Plan (Responses to T6 and T7)**

APPENDIX IV.D
WASTE ANALYSIS PLAN

Hazardous Waste Permit Renewal Application

Hazardous Waste Permit No. 50219
BASF Beaumont Agro Plant, Beaumont, Texas

1.0 INTRODUCTION AND FACILITY OVERVIEW

The BASF Beaumont Agro Plant (BASF Beaumont) facility utilizes five permitted Class I injection wells for the disposal of non-hazardous industrial process wastewater: Well Nos. 5, 6, 7, 8, and 9 (WDW-155, -201, -301, -302, and -433, respectively). Injection primarily occurs into the permitted Lower Miocene formation and the Frio formation, at depths ranging from approximately 3,800 feet to 8,250 feet below ground surface.

2.0 WASTE GENERATION AND SOURCES

The BASF Beaumont facility is authorized to inject non-hazardous aqueous liquid wastes generated primarily from the manufacturing processes of herbicides, specifically from the Dicamba and Dimethenamid (DMTA) units. Waste streams originate from various points within these processes where contact with raw materials, intermediates, or products may occur.

Additional authorized waste sources include:

- The Formulations, Filling, and Packaging (FFP) unit, which processes final products and generates wastewater from cleanups and loading/unloading activities.
- General plant operations (e.g., tank farms, utilities wastewater).
- Non-hazardous wash waters and cleaning solutions for process equipment.
- Compatible, non-hazardous streams received from off-site BASF facilities (e.g., Hannibal, Missouri; Total Petrochemical, Port Arthur, Texas) and approved third-party facilities (e.g., Jayhawk, Galena, Kansas) since 2018. Note that the Jayhawk facility produces a formulation for BASF, using BASF technology, and only sends the non-hazardous wastes generated from this specific process to BASF for disposal. As part of this arrangement, BASF pays Jayhawk to formulate the product and assumes the disposal costs.

3.0 WASTE MANAGEMENT AND PROCESSING

Wastewater streams are collected and managed in designated tank systems before injection, including:

- The “414 Tank Farm” (Tanks F-414A, F-414B, and F-414C) receiving Dicamba, FFP, and off-site wastes, typically feeding Wells 5, 6, and 9.
- DMTA wastes from Tanks WB-502A, WB-502B, WB-1765, and WB-1767 typically feeding Wells 7 and 8.

While streams can be commingled for pH management, the facility maintains operational flexibility to route compatible waste streams to active injection well as needed.

4.0 WASTE CLASSIFICATION AND CHARACTERISTICS

All injected waste streams are classified as non-hazardous industrial wastes under Texas Commission on Environmental Quality (TCEQ) regulations, as listed in Table IV.B. Consequently, the wastes do not carry U.S. Environmental Protection Agency (EPA) hazardous waste codes.

Key characteristics of the composite waste stream include:

- Chemically stable, clear to amber liquid
- Permitted pH range: > 2.0 to < 12.5
- Permitted Specific Gravity: < 1.20 g/ml at 20°C
- Estimated Viscosity: 1 centipoise at 68°F
- No radioactive elements

5.0 WASTE ANALYSIS AND MONITORING PLAN

The sampling and analysis information are summarized in Table IV.C.

6.0 OFF-SITE GENERATED NON-HAZARDOUS WASTES

Prior to bringing any new waste stream to BASF Beaumont, each off-site location must provide documentation of the hazardous waste determination for the waste stream to the BASF Beaumont Environmental Health & Safety (EHS) Group for approval. Documentation must consist of waste analysis or appropriate process knowledge as described under 40 Code of Federal Regulations (CFR) 261.

Prior to accepting a tank truck, the off-site generator must also provide a 1-quart jar for testing in the BASF Beaumont Quality Assurance (QA) laboratory. Parameters to be analyzed include the following:

- Flash point > 150F
- Specific gravity >0.99 to <1.20
- pH >2.0 to <12.5
- Compatibility at 1:1 ratio No exothermic reaction, precipitant forming, or off gassing

The unloading location will be at: i) B-548 sump, which is located north of the DCSA roll-off staging area; ii) B-514, which is located south of the roll-off staging area; or iii) S-440 sump, which is located at sand filter area. BASF will stop all transfers if there are any indications of leaks or unusual odors. When unloading off-site wastes from a truck, the site-specific check sheet, including waste manifest and testing results verification, must be used and turned in with truck paperwork to BASF Beaumont supervision.

**Technical NOD 1 Response
Hazardous Waste Permit Renewal Application**

BASF Agricultural Solutions US LLC, Beaumont, Texas
Hazardous Waste Permit No. 50219

**Part B, Section V – Table V.C
(Response to T8)**

Table V.C. - Tanks and Tank Systems

| Permit Unit No. | Tank | N.O.R. No. | Storage and/or Processing | Waste Nos. ¹ | Rated Capacity | Dimensions | Containment Volume (including rainfall for unenclosed areas) | Unit will manage Ignitable, Reactive, or Incompatible waste (state all that apply) | Unit Status |
|-----------------|---------|------------|---------------------------|-------------------------|----------------|-------------------|--|--|-------------|
| 07 | F-414A | 042 | Storage | NA | 196,202 gal | 46' dia x 16' | 262,199 gal | No | Active |
| 08 | WB-1767 | 061 | Storage | NA | 150,000 gal | 30' dia x 29' | 226,327 gal | No | Active |
| 09 | F-414B | 042 | Storage | NA | 197,000 gal | 46' dia x 16' | 262,199 gal | No | Active |
| 10 | F-414C | 069 | Storage | NA | 197,000 gal | 46' dia x 16' | 262,199 gal | No | Active |
| 12 | WB-502A | 073 | Storage | NA | 1,000,000 gal | 69'9" dia x 35'9" | 1,333,335 gal | No | Active |
| 13 | WB-502B | 074 | Storage | NA | 1,000,000 gal | 69'9" dia x 35'9" | 1,333,335 gal | No | Active |
| 14 | WB-1765 | 071 | Storage | NA | 1,000,000 gal | 69'9" dia x 35'9" | 1,333,335 gal | No | Active |

1. from Table IV.B, first column

**Technical NOD 1 Response
Hazardous Waste Permit Renewal Application**

BASF Agricultural Solutions US LLC, Beaumont, Texas
Hazardous Waste Permit No. 50219

**Part B, Section V – Appendix V.A
Engineering Report
(Response to T9)**

PART B APPLICATION
APPENDIX V.A - GENERAL ENGINEERING REPORT


Hazardous Waste Permit Renewal Application

Hazardous Waste Permit No. 50219
BASF Beaumont Agro Plant, Beaumont, Texas

I, James M. McDade, a registered professional engineer in the State of Texas, certify that the Engineering Report in the Hazardous Waste Permit Renewal Application, dated 14 March 2025 and submitted on 14 April 2025 for the following waste management units at the BASF Beaumont Agro Plant located in Beaumont, Texas, has been prepared in accordance with good engineering practices, requirements of 30 TAC 305.45(a)(8)(A), and the TCEQ RCRA Permit Application (TCEQ-00376, Revised 1 March 2023):

- Tanks F-414A, F-414B, and F-414C (Permit Unit Nos. 07, 09, and 10);
- Tank WB-1767 (Permit Unit No. 08); and
- Tanks WB-502A, WB-502B, and WB-1765 (Permit Unit Nos. 12, 13, and 14).




James M. McDade, P.E.
State of Texas Registration No. 115868
GSI Environmental Inc.
Texas Registration No. F-1198

4 September 2025

**Technical NOD 1 Response
Hazardous Waste Permit Renewal Application**

BASF Agricultural Solutions US LLC, Beaumont, Texas
Hazardous Waste Permit No. 50219

**Part B, Section VII – Tables VII.B, VII.B.1,
and VII.E.1 (Response to T10)**

Table VII.B - Unit Closure Cost Estimate

| Task | Cost |
|--|-----------|
| Tank F-414A (Permit Unit 07) | |
| Mobilization (lump sum cost per event) | \$2,600 |
| Site setup (supervisory personnel for 3 weeks with the unit cost of \$2,600/week) | \$7,800 |
| Disposal of stormwater (assume 8,167 gallons with the unit cost of \$0.40/gal) | \$3,267 |
| Disposal of wastewater (assume 196,202 gallons with the unit cost of \$0.40/gal) | \$78,481 |
| Decontamination of tanks, piping, and secondary containment, including sample collection | \$13,400 |
| Analysis of secondary containment decontamination rinsate samples for pH, VOCs, SVOCs, TPH and Metals (estimate 2 samples with the unit cost of \$422/sample) | \$844 |
| Analysis of equipment decontamination rinsate samples at end of work program for pH, VOCs, SVOCs, TPH and Metals (estimate 5 samples with the unit cost of \$422/sample) | \$2,110 |
| Closure certification | \$3,500 |
| Subtotal | \$112,002 |
| Contingency (10% minimum) | \$11,200 |
| Total Closure Cost Year 2024 | \$123,200 |

Table VII.B - Unit Closure Cost Estimate

| Task | Cost |
|--|---------------------|
| Tank WB-1767 (Permit Unit 08) | |
| Mobilization (lump sum cost per event) | \$2,600 |
| Site setup (supervisory personnel for 3 weeks with the unit cost of \$2,600/week) | \$7,800 |
| Disposal of stormwater (assume 10,600 gallons with the unit cost of \$0.40/gal) | \$4,240 |
| Disposal of wastewater (assume 150,000 gallons with the unit cost of \$0.40/gal) | \$60,000 |
| Decontamination of tanks, piping, and secondary containment, including sample collection | \$10,300 |
| Analysis of secondary containment decontamination rinsate samples for pH, VOCs, SVOCs, TPH and Metals (estimate 2 samples with the unit cost of \$422/sample) | \$844 |
| Analysis of equipment decontamination rinsate samples at end of work program for pH, VOCs, SVOCs, TPH and Metals (estimate 5 samples with the unit cost of \$422/sample) | \$2,110 |
| Closure certification | \$3,500 |
| Subtotal | \$91,394 |
| Contingency (10% minimum) | \$9,139 |
| Total Closure Cost | Year 2024 \$100,500 |

Table VII.B - Unit Closure Cost Estimate

| Task | Cost |
|--|-----------|
| Tank F-414B (Permit Unit 09) | |
| Mobilization (lump sum cost per event) | \$2,600 |
| Site setup (supervisory personnel for 3 weeks with the unit cost of \$2,600/week) | \$7,800 |
| Disposal of stormwater (assume 8,167 gallons with the unit cost of \$0.40/gal) | \$3,267 |
| Disposal of wastewater (assume 197,000 gallons with the unit cost of \$0.40/gal) | \$78,800 |
| Decontamination of tanks, piping, and secondary containment, including sample collection | \$13,400 |
| Analysis of secondary containment decontamination rinsate samples for pH, VOCs, SVOCs, TPH and Metals (estimate 2 samples with the unit cost of \$422/sample) | \$844 |
| Analysis of equipment decontamination rinsate samples at end of work program for pH, VOCs, SVOCs, TPH and Metals (estimate 5 samples with the unit cost of \$422/sample) | \$2,110 |
| Closure certification | \$3,500 |
| Subtotal | \$112,321 |
| Contingency (10% minimum) | \$11,232 |
| Total Closure Cost Year 2024 | \$123,600 |

Table VII.B - Unit Closure Cost Estimate

| Task | Cost |
|--|-----------|
| Tank F-414C (Permit Unit 10) | |
| Mobilization (lump sum cost per event) | \$2,600 |
| Site setup (supervisory personnel for 3 weeks with the unit cost of \$2,600/week) | \$7,800 |
| Disposal of stormwater (assume 8,167 gallons with the unit cost of \$0.40/gal) | \$3,267 |
| Disposal of wastewater (assume 197,000 gallons with the unit cost of \$0.40/gal) | \$78,800 |
| Decontamination of tanks, piping, and secondary containment, including sample collection | \$13,400 |
| Analysis of secondary containment decontamination rinsate samples for pH, VOCs, SVOCs, TPH and Metals (estimate 2 samples with the unit cost of \$422/sample) | \$844 |
| Analysis of equipment decontamination rinsate samples at end of work program for pH, VOCs, SVOCs, TPH and Metals (estimate 5 samples with the unit cost of \$422/sample) | \$2,110 |
| Closure certification | \$3,500 |
| Subtotal | \$112,321 |
| Contingency (10% minimum) | \$11,232 |
| Total Closure Cost Year 2024 | \$123,600 |

Table VII.B - Unit Closure Cost Estimate

| Task | Cost |
|--|-----------|
| Tank WB-502A (Permit Unit 12) | |
| Mobilization (lump sum cost per event) | \$2,600 |
| Site setup (supervisory personnel for 5 weeks with the unit cost of \$2,600/week) | \$13,000 |
| Disposal of stormwater (assume 17,800 gallons with the unit cost of \$0.40/gal) | \$7,120 |
| Disposal of wastewater (assume 1,000,000 gallons with the unit cost of \$0.40/gal) | \$400,000 |
| Decontamination of tanks, piping, and secondary containment, including sample collection | \$66,600 |
| Analysis of secondary containment decontamination rinsate samples for pH, VOCs, SVOCs, TPH and Metals (estimate 2 samples with the unit cost of \$422/sample) | \$844 |
| Analysis of equipment decontamination rinsate samples at end of work program for pH, VOCs, SVOCs, TPH and Metals (estimate 5 samples with the unit cost of \$422/sample) | \$2,110 |
| Closure certification | \$3,500 |
| Subtotal | \$495,774 |
| Contingency (10% minimum) | \$49,577 |
| Total Closure Cost Year 2024 | \$545,400 |

Table VII.B - Unit Closure Cost Estimate

| Task | Cost |
|--|-----------|
| Tank WB-502B (Permit Unit 13) | |
| Mobilization (lump sum cost per event) | \$2,600 |
| Site setup (supervisory personnel for 5 weeks with the unit cost of \$2,600/week) | \$13,000 |
| Disposal of stormwater (assume 17,800 gallons with the unit cost of \$0.40/gal) | \$7,120 |
| Disposal of wastewater (assume 1,000,000 gallons with the unit cost of \$0.40/gal) | \$400,000 |
| Decontamination of tanks, piping, and secondary containment, including sample collection | \$66,600 |
| Analysis of secondary containment decontamination rinsate samples for pH, VOCs, SVOCs, TPH and Metals (estimate 2 samples with the unit cost of \$422/sample) | \$844 |
| Analysis of equipment decontamination rinsate samples at end of work program for pH, VOCs, SVOCs, TPH and Metals (estimate 5 samples with the unit cost of \$422/sample) | \$2,110 |
| Closure certification | \$3,500 |
| Subtotal | \$495,774 |
| Contingency (10% minimum) | \$49,577 |
| Total Closure Cost Year 2024 | \$545,400 |

Table VII.B - Unit Closure Cost Estimate

| Task | Cost |
|--|---------------------|
| Tank WB-1765 (Permit Unit 14) | |
| Mobilization (lump sum cost per event) | \$2,600 |
| Site setup (supervisory personnel for 5 weeks with the unit cost of \$2,600/week) | \$13,000 |
| Disposal of stormwater (assume 17,800 gallons with the unit cost of \$0.40/gal) | \$7,120 |
| Disposal of wastewater (assume 1,000,000 gallons with the unit cost of \$0.40/gal) | \$400,000 |
| Decontamination of tanks, piping, and secondary containment, including sample collection | \$66,600 |
| Analysis of secondary containment decontamination rinsate samples for pH, VOCs, SVOCs, TPH and Metals (estimate 2 samples with the unit cost of \$422/sample) | \$844 |
| Analysis of equipment decontamination rinsate samples at end of work program for pH, VOCs, SVOCs, TPH and Metals (estimate 5 samples with the unit cost of \$422/sample) | \$2,110 |
| Closure certification | \$3,500 |
| Subtotal | \$495,774 |
| Contingency (10% minimum) | \$49,577 |
| Total Closure Cost | Year 2024 \$545,400 |

Table VII.B.1 Closure Cost Estimate: Unit Rates

| | Cost for Closure Estimate | | Quote from Vendor | | Quote Source |
|---|---------------------------|--------|-------------------|--------|----------------------|
| | Unit Cost¹ | Unit | Unit Cost | Unit | |
| CLOSURE COST | | | | | |
| 1. Tanks | | | | | |
| Site Preparation | | | | | |
| Mobilization | \$ 2,600 | total | \$ 2,500 | total | CIMA 2024 |
| Site Setup | \$ 2,600 | week | \$ 2,500 | week | CIMA 2024 |
| Disposal of Stormwater | \$ 0.40 | gal | \$ 0.39 | gal | Texas Molecular 2024 |
| Waste Removal | | | | | |
| Disposal of Wastewater | \$ 0.40 | gal | \$ 0.39 | gal | Texas Molecular 2024 |
| Decontamination of Tanks, Piping, and Secondary Containment, Including Sample Collection (Tanks WB-1765, WB-502A and WB-502B) | \$ 66,600 | each | \$ 65,000 | each | CIMA 2024 |
| Decontamination of Tanks, Piping, and Secondary Containment, Including Sample Collection (Tanks F-414A, F-414B and F-414C) | \$ 13,400 | each | \$ 13,000 | each | CIMA 2024 |
| Decontamination of Tanks, Piping, and Secondary Containment, Including Sample Collection (Tank WB-1767) | \$ 10,300 | each | \$ 10,000 | each | CIMA 2024 |
| Analysis of Equipment Decontamination Rinsate Samples for pH, VOCs, SVOCs, TPH and Metals | \$ 422 | sample | \$ 413 | sample | Eurofins Quote 2024 |
| Analysis of Secondary Containment Decontamination Rinsate Samples for pH, VOCs, SVOCs, TPH and Metals | \$ 422 | sample | \$ 413 | sample | Eurofins Quote 2024 |
| Documentation | | | | | |
| Closure Certification | \$ 3,500 | total | \$ 3,500 | total | GSI Cost 2025 |

Notes:

1. The costs listed in this table are based on 2024 dollar values or updated for inflation where necessary.

Table VII.E.1 - Permitted Unit Closure Cost Summary

| Existing Unit Closure Cost Estimate | | |
|--|-----------|--------------|
| Unit | | Cost |
| Tank F-414A (Permit Unit 07) | \$ | 123,200 |
| Tank WB-1767 (Permit Unit 08) | \$ | 100,500 |
| Tank F-414B (Permit Unit 09) | \$ | 123,600 |
| Tank F-414C (Permit Unit 10) | \$ | 123,600 |
| Tank WB-502A (Permit Unit 12) | \$ | 545,400 |
| Tank WB-502B (Permit Unit 13) | \$ | 545,400 |
| Tank WB-1765 (Permit Unit 14) | \$ | 545,400 |
| Total Existing Unit Closure Cost Estimate¹ | Year 2024 | \$ 2,107,100 |

| Proposed Unit Closure Cost Estimate | | |
|--|-----------|-------------|
| Unit | | Cost |
| Not Applicable | | |
| Total Proposed Unit Closure Cost Estimate¹ | Year 2024 | - |

1. As units are added or deleted from these tables through future permit amendments or modifications, the remaining itemized unit costs should be updated for inflation when re-calculating the revised total cost in current dollars.

Table VII.E.2 - Permitted Unit Post-Closure Cost Summary

| Existing Unit Post-Closure Cost Estimate | |
|---|-------------|
| Unit | Cost |
| Not Applicable | |
| | |
| Total Existing Unit Post-Closure Cost Estimate¹ | Year 2024 - |

| Proposed Unit Post-Closure Cost Estimate | |
|---|-------------|
| Unit | Cost |
| Not Applicable | |
| | |
| Total Proposed Unit Post-Closure Cost Estimate¹ | Year 2024 - |

1. As units are added or deleted from these tables through future permit amendments or modifications, the remaining itemized unit costs should be updated for inflation when re-calculating the revised total cost in current dollars.

**Technical NOD 1 Response
Hazardous Waste Permit Renewal Application**

BASF Agricultural Solutions US LLC, Beaumont, Texas
Hazardous Waste Permit No. 50219

**Part B, Section VIII – Appendix VIII.A
(Response to T11)**

Michael Wang

From: Tony Germinario [REDACTED]
Sent: Wednesday, September 3, 2025 11:08 AM
To: Kendra D Derrick
Cc: Andriy Partykevych; Caitlin Wilding
Subject: RE: [EXT] RE: TCEQ / BASF - Letter of Credit Issuance

Hi Kendra – we're still working on getting the revisions through. Hopefully have something within next week or so.

Tony Germinario
N.A. Environmental Expert Services Manager

Phone: +1 973-652-3430, Mobile: +1-973-652-3430, Email: [REDACTED]
Postal Address: BASF Corporation, 100 Park Avenue, NJ Florham Park, NJ, USA



BASF Corporation

"We create value with our partners by caring for people and the environment"

From: Kendra D Derrick [REDACTED]
Sent: Wednesday, September 3, 2025 11:10 AM
To: Tony Germinario [REDACTED]
Cc: Andriy Partykevych [REDACTED] Caitlin Wilding [REDACTED]
Subject: RE: [EXT] RE: TCEQ / BASF - Letter of Credit Issuance

Tony,

Do you have a finalized signed addendum that you can send over?

From: Kendra D Derrick
Sent: Monday, August 18, 2025 2:22 PM
To: Tony Germinario [REDACTED]
Cc: Andriy Partykevych [REDACTED] Caitlin Wilding [REDACTED]
Subject: RE: [EXT] RE: TCEQ / BASF - Letter of Credit Issuance

Tony,

Yes, that is the correct address.

From: Tony Germinario [REDACTED]
Sent: Monday, August 18, 2025 8:29 AM
To: Kendra D Derrick [REDACTED]
Subject: FW: [EXT] RE: TCEQ / BASF - Letter of Credit Issuance

Hi Kendra – TCEQ has approved the proposed amendments to our financial assurance letters of credit to identify the new BASF Agricultural Solutions legal entity under the BASF umbrella (vs. putting in a separate LC).

Can you please verify that the following address is correct for Beaumont (see Mark's comment below) for the 3 letters of credit (RCRA, UIC, and 3rd party liability)?

14385 W. Port Arthur Road, Beaumont, TX 77705

Tony Germinario

N.A. Environmental Expert Services Manager

Phone: +1 973-652-3430, Mobile: +1-973-652-3430, Email: [REDACTED]

Postal Address: BASF Corporation, 100 Park Avenue, NJ Florham Park, NJ, USA



BASF Corporation

"We create value with our partners by caring for people and the environment"

From: Mark Stoebner [REDACTED]

Sent: Friday, August 15, 2025 7:07 PM

To: Andriy Partykevych <[REDACTED]> Amanda Gruesbeck [REDACTED] Martin West [REDACTED] >; Nicole Sullivan [REDACTED]; Erin Brennan [REDACTED] Tony Germinario [REDACTED]; Lev Bekker [REDACTED]; nancy.jordan [REDACTED]

[REDACTED] jamie Henig (EXT [REDACTED]) [REDACTED]

Subject: [EXT] RE: TCEQ / BASF - Letter of Credit Issuance

Good afternoon, Andriy –

Please be advised that we're ok with your proposed language attached and willing to allow Intesa Sanpaolo SpA to amend the current letter of credit (LC) No. 35674 as previously formatted. We prefer to have the instrument amended **in its entirety** rather than piecemeal.

All address appear correct for the IHW permits, but please double check the Beaumont underground injection control permits to ensure those addresses align with the LC as well, i.e., 14385 W. Port Arthur Road, Beaumont, TX 77705. If they have a different address, please update the LC accordingly.

Feel free to move forward on a final draft and we'll be happy to take a look at it prior to final bank sign-off.

Should you have any questions, feel free to call me at the number below.

All the best,

Mark

Mark Stoebner, Financial Analyst

Direct Line: 512/239-6150
Texas Commission on Environmental Quality
Financial Assurance Unit, Mail Code - 184
12100 Park 35 Circle
Austin, Texas 78753



From: Andriy Partykevych <[REDACTED]>
Sent: Thursday, August 14, 2025 11:46 AM
To: Amanda Gruesbeck <[REDACTED]> Martin West <[REDACTED]> Mark Stoebner <[REDACTED]>
Nicole Sullivan <[REDACTED]> Erin Brennan <[REDACTED]>
Tony Germinario <[REDACTED]> Lev Bekker <lev.bekker@basf.com>; nancy.jordan <[REDACTED]>
jamie Henig (EXT [REDACTED]) <[REDACTED]>
Subject: RE: TCEQ / BASF - Letter of Credit Issuance

Hello Mark,

Attached is a copy of the letter of credit issued in 2005. As discussed, we drafted proposed language to amend this 2005 letter of credit to satisfy TCEQ requirements.

Let us know if you have any questions.

Best regards,
Andriy Partykevych
Treasury, Finance

Phone: +1 973 245 7709, Email: [REDACTED]
[REDACTED] NJ 07932, United States



-----Original Appointment-----

From: Andriy Partykevych
Sent: Thursday, August 7, 2025 2:15 PM
To: Andriy Partykevych; Amanda Gruesbeck; Martin West; [REDACTED] Nicole Sullivan; Erin Brennan; Tony Germinario; Lev Bekker; nancy.jordan; jamie Henig (EXT [REDACTED])
Subject: TCEQ / BASF - Letter of Credit Issuance
When: Thursday, August 14, 2025 11:00 AM-11:30 AM (UTC-05:00) Eastern Time (US & Canada).
Where: Microsoft Teams Meeting

Microsoft Teams [Need help?](#)

Signature Page

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Operator Signature: Brenda Neely Date: 9/11/25

Name and Official Title (type or print): Brenda L Neely, Site Director

Operator Signature: _____ Date: _____

Name and Official Title (type or print): _____

Operator Signature: _____ Date: _____

Name and Official Title (type or print): _____

Owner Signature: _____ Date: _____

Name and Official Title (type or print): _____

To be completed by the operator if the application is signed by an authorized representative for the operator

I, _____ hereby designate _____
(operator) (authorized representative)
as my representative and hereby authorize said representative to sign any application, submit additional information as may be requested by the Commission; and/or appear for me at any hearing or before the Texas Commission on Environmental Quality in conjunction with this request for a Texas Water Code or Texas Solid Waste Disposal Act permit. I further understand that I am responsible for the contents of this application, for oral statements given by my authorized representative support of the application, and for compliance with the terms and conditions of any permit which might be issued based upon this application.

Printed or Typed Name of Operator or Principal Executive Officer

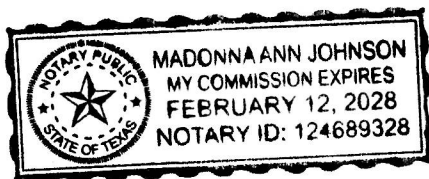
Signature

(Note: Application Must Bear Signature & Seal of Notary Public)

Subscribed and sworn to before me by the said Brenda L Neely on this

11th day of September, 2025.

My commission expires of the 12th day of February, 2028



Madonna Ann Johnson
Notary Public in and for Jefferson County, Texas

Signature Page

I, Brenda L. Neely, Site Director,
(Operator) (Title)

certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Signature: Brenda Neely Date: 9/11/25

To be completed by the Operator if the application is signed by an Authorized Representative for the Operator

I, _____, hereby designate _____
[Print or Type Name] [Print or Type Name]

as my representative and hereby authorize said representative to sign any application, submit additional information as may be requested by the Commission; and/or appear for me at any hearing or before the Texas Commission on Environmental Quality in conjunction with this request for a Texas Water Code or Texas Solid Waste Disposal Act permit. I further understand that I am responsible for the contents of this application, for oral statements given by my authorized representative in support of the application, and for compliance with the terms and conditions of any permit which might be issued based upon this application.

Printed or Typed Name of Operator or Principal Executive Officer

Signature

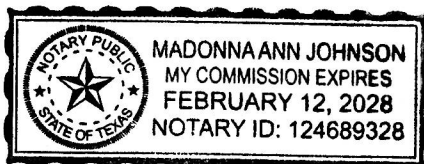
SUBSCRIBED AND SWORN to before me by the said Brenda Neely

On this 11th day of September, 2025

My commission expires on the 12th day of February, 2028

Notary Public in and for Jefferson County, Texas

[Note: Application Must Bear Signature & Seal of Notary Public]



Madonna Ann Johnson

From:



Cc:

Subject:

TECHNICAL NOD 1 – Compliance Plan – Permit Renewal - BASF Agricultural Solutions US LLC – Permit No. 50219

Date:

Friday, May 23, 2025 9:17:27 AM

Attachments:

[50219 - CP NOD 1 \(05-23-2025\).pdf](#)

BASF Agricultural Solutions US LLC – Beaumont, Jefferson County

Hazardous Waste Permit No. 50219

Industrial Solid Waste Registration No. 30053

EPA Identification No. TXD067261412

RN100634922/CN605566066

Dear Ms. Kavetza:

The Voluntary Cleanup Program and Corrective Action (VCP-CA) Section staff of the Texas Commission on Environmental Quality (TCEQ) has reviewed your permit renewal application dated March 27, 2025. Our review of the application indicates that additional information must be presented to demonstrate compliance with Title 30 Texas Administrative Code (TAC) Sections (§§)305.45 and 305.50.

The deficiencies noted in the attached Technical NOD 1 - Compliance Plan (CP) table follow the format of the TCEQ's Part B hazardous waste permit application form. Each deficiency is uniquely identified in the attached table and requires your response. Please note, when providing your response, you must:

1. Refer to the unique deficiency identifier;
2. Include the location in the permit application where your response requires revisions or where you provide additional information;
3. Include any other narrative necessary to explain your response;
4. If possible, provide a redline/strikeout version clearly identifying all proposed changes from the existing permit application;
5. Include replacement pages for insertion into the application. Each replacement page should contain a revision date and revision number; and
6. If a revision to the application causes text to shift and/or pagination to change, please provide all pages affected by the revision(s).

Please submit your response as an unmarked copy, and as a marked copy in redline/strikeout format, via email for our review **within 21 days** of the date of this email (by **Friday June 13, 2025**). Please do not hesitate to email me if you have any questions.

At the completion of the technical review, a complete NOD response package, which includes **all** Remediation Corrective Action NOD responses, IHW NOD responses, and an original signature page(s), **must be sent as a paper copy to IHW**.

Note: All confidential NOD response materials (paper or email) must be labeled as CONFIDENTIAL, contain **only** confidential materials, and **must be submitted separately**. **Do not submit confidential and non-confidential information in the same email**. If the TCEQ receives an email containing both confidential and non-confidential documents, the email will not be treated as confidential. **Applicants must mark each individual confidential page as confidential at the bottom of the page.**

Please reply to this email to set up a phone conference to go over the comments in the CP NOD 1 Table and any questions that you may have. The phone call should be scheduled within 7 days of this email (by **Friday May 30, 2025**).

Sincerely,

Rachel Vander Nat, Project Manager

Team 1, VCP-CA Section

Remediation Division

TCEQ – Office of Waste

512-239-1488

Application Deficiencies – Technical NOD 1 - Compliance Plan

| ID ¹ | App. Part | App. Section | Location ² | Citation | Error Type ³ | Deficiency Description/Resolution |
|-----------------|-----------|--------------|---|-------------------------|-------------------------|---|
| CP1 | B | XI.A. | Table XI.A.1. | 30 TAC §335.167 | Omitted | Please add the Dicamba Area of Concern (AOC) to the table. |
| CP2 | B | XI.A | XI.A.1.a. and CP Attachment A, Sheet 1 of 3 | 30 TAC §305.45(a)(8)(C) | Omitted | Please add to the map the plume management zone (PMZ) boundary for the Solid Waste Management Area (SWMA). |
| CP3 | B | XI.A. | XI.A.1.b., XI.A.2., and CP Attachment A, Sheet 2 of 3 | 30 TAC §305.45(a)(8)(C) | Incorrect/Omitted | The topographic map required by the Part B application instructions should not be included as a CP Attachment A map. Instead, please replace the topographic map with a map that depicts the solid waste management unit (SWMU) and AOCs listed on CP Table II. Please also include on the figure any on-site wastewater treatment units. |
| CP4 | B | XI.A | CP Attachment A, Sheets 1- 3 of 3 | 30 TAC §305.45(a)(8)(C) | Format | Please remove Sheet 3 from CP Attachment A because groundwater monitoring of the SWMA's PMZ is no longer required under the Compliance Plan. Please also revise the titles of the CP Attachment A Sheets 1 and 2 to reflect that there are only two total sheets in CP Attachment A. |

¹ Deficiency ID – Key: A#=Administrative deficiency (ex. A12); T#=Technical deficiency relating to Sections I-X and Sections XII-XIII of the Part B application (ex. T10); C#=Comment only (ex. C1); CP#=Technical deficiency relating to Section XI-Compliance Plan of the Part B application (ex. CP14); Number in parenthesis (n) = nth instance of same deficiency (ex. T1(2) is the second instance of deficiency T1 originally identified in previous NOD).

² Location of deficiency in submittal/application. Items in square brackets [] refer to applicant's supplemental information submitted as attachments to the application form.

³ Possible Error Types: Ambiguous, Incomplete, Inconsistent, Incorrect, Omitted, Typo, or Format.

From:

Date:

Attachments:

NOD 1 – Compliance Plan – Class 3 Permit Modification - BASF Corporation – Permit No. 50219

Tuesday, July 2, 2024 12:17:19 PM

[50219 - CP NOD 1 Table \(07-02-2024\).pdf](#)

BASF Corporation – Beaumont, Jefferson County

Hazardous Waste Permit No. 50219

Industrial Solid Waste Registration No. 30053

EPA Identification No. TXD067261412

RN100634922/CN600124895

Dear Ms. Derrick:

The Voluntary Cleanup Program and Corrective Action (VCP-CA) Section staff of the Texas Commission on Environmental Quality (TCEQ) has reviewed your Class 3 permit modification application dated April 5, 2024. Our review of the application indicates that additional information must be presented to demonstrate compliance with Title 30 Texas Administrative Code (TAC) Sections (§§)305.45 and 305.50.

The deficiencies noted in the attached Technical NOD 1 - Compliance Plan (CP) table follow the format of the TCEQ's Part B hazardous waste permit application form. Each deficiency is uniquely identified in the attached table and requires your response. Please note, when providing your response, you must:

1. Refer to the unique deficiency identifier;
2. Include the location in the permit application where your response requires revisions or where you provide additional information;
3. Include any other narrative necessary to explain your response;
4. If possible, provide a redline/strikeout version clearly identifying all proposed changes from the existing permit application;
5. Include replacement pages for insertion into the application. Each replacement page should contain a revision date and revision number; and
6. If a revision to the application causes text to shift and/or pagination to change, please provide all pages affected by the revision(s).

Please submit your response as an unmarked copy, and as a marked copy in redline/strikeout format, via email for our review within 20 days of the date of this email (by **Monday July 22, 2024**). Please do not hesitate to email me if you have any questions.

At the completion of the technical review, a complete NOD response package, which includes **all** Remediation Corrective Action NOD responses, IHW NOD responses, and an original signature page(s), **must be sent as a paper copy to IHW**.

Note: All confidential NOD response materials (paper or email) must be labeled as CONFIDENTIAL, contain **only** confidential materials, and **must be submitted separately**. **Do not submit confidential and non-confidential information in the same email**. If the TCEQ receives an email containing both confidential and non-confidential documents, the email will not be treated as confidential. **Applicants must mark each individual confidential page as confidential at the bottom of the page.**

Please reply to this email to set up a phone conference to go over the comments in the CP NOD 1 Table and any questions that you may have. The phone call should be scheduled within 8 days of this email (by **Wednesday July 10, 2024**).

Sincerely,

Rachel Vander Nat, Project Manager

Team 1, VCP-CA Section

Remediation Division

TCEQ – Office of Waste

512-239-1488

Application Deficiencies – Technical NOD 1 - Compliance Plan

| ID ¹ | App. Part | App. Section | Location ² | Citation | Error Type ³ | Deficiency Description/Resolution |
|-----------------|-----------|-----------------|---|------------------------------------|-------------------------|---|
| CP 1 | B | XI.A. and XI.D. | CP Table II and [Response Action Completion Report (RACR) Chronology] | 30 TAC §335.167 and §350.95 | Omitted | a) Please clarify if there are other solid waste management units (SWMUs) or areas of concern (AOCs) at the facility that have not yet completed the RCRA Corrective Action obligations of BASF Corporation's permit and Compliance Plan; and b) Revise the RACR's Chronology if BASF Corporation has completed the RCRA Corrective Action obligations for the Dicamba AOC discovered in 2018. |
| CP 2 | B | XI.A. | [Notice of Registration (NOR)] | 30 TAC §335.6 and §335.8 | General | Please ensure to contact the TCEQ's Registration and Reporting Section to update the "unit status" for the Solid Waste Management Area (SWMA; WMU No. 010) on BASF Corporation's NOR once the TCEQ issues the Class 3 Permit Modification. No response is required for this comment. |
| CP 3 | B | XI.D | [RACR] | 30 TAC §335.5, §335.8, and §350.95 | Omitted | Revise the RACR to include a brief discussion of the waste management history of the SWMA. Please discuss whether the SWMA was clean-closed or if waste was left in-place. Include a draft deed notice in Appendix 3 if waste was left in-place, per Title 30 Texas Administrative Code (TAC) §335.5 and the TCEQ's guidance document " Closure of Waste Management Units Subject to TRRP " (RG-366/TRRP-2A). |
| CP 4 | B | XI.D | [RACR] | 30 TAC §335.167 | Omitted | Revise the RACR to demonstrate that BASF Corporation has met the requirements of Permit Provision XI.D.6.e to terminate the Corrective Action Program for the SWMA. |

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