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January 6, 2015
AECOM Project No. 60335556

Air Permit Initial Review Team (APIRT)
Texas Commission on Environmental Quality, MC – 161
12100 Park 35 Circle, Building C, Third Floor, Room 300W
Austin, Texas 78763

Subject: **Permit by Rule Documentation for Remediation Activities**
Kerr-McGee Oil & Gas Onshore, LLC.
Customer Reference No.: CN601170566

Dear TCEQ APIR Team,

On behalf of Kerr-McGee Oil & Gas Onshore, LLC (Kerr-McGee), a subsidiary of Anadarko Petroleum Corporation (Anadarko), AECOM Technical Services, Inc. (AECOM) is submitting this voluntary Permit by Rule (PBR) documentation to authorize operation of remediation activities at the former Westlake Natural Gasoline Plant located approximately 3.5 miles north of Maryneal in Nolan County, Texas. The proposed project will comply with the PBR TAC § 106.533 (Remediation)

30 TAC § 106.533(h) stipulates that compliance must be demonstrated by the use of a PID or FID for emission releases that are not directly emitted from a control device or stack which can be sampled. The remediation site contains soil impacted with polychlorinated biphenyls (PCBs) only, which are non-volatile. Kerr-McGee hereby requests a waiver from the PID or FID monitoring requirement listed in § 106.533(h) and the associated recordkeeping requirements listed in § 106.533(j)(B).

Prior to starting remediation activities, Kerr-McGee will notify the commission using form TCEQ-20122, Regional Notification for Permits by Rule and Standard Permits. Notification will be sent to the TCEQ Region 3 Office located in Abilene, Texas.

Yours sincerely,

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AECOM Environment

Submitted to:
Kerr-McGee Oil and Gas Onshore, LLC
Westlake, TX

Submitted by:
AECOM
Houston, TX
60335556
December 2014

Permit by Rule Documentation
Remediation Activities under 30 TAC 106.533
Kerr-McGee Westlake Site, Maryneal, TX

PCBs are not listed in §106.261 or §106.262, but are listed in the ESL list. The short-term ESL limit for polychlorinated biphenyl is 0.1 micrograms per cubic meter ($\mu g/m^{3)}$. Since the short-term ESL for the compound is less than 2 $\mu g/m^3$, emissions will not exceed 0.01 lb/hr.

(B) Total annual emissions of each organic or inorganic compound are limited to five tons per year for each facility.

Total annual emissions are estimated to be below the five ton per year limit.

(2) If a control device is needed to meet the emissions limits of this section, the device must satisfy the appropriate conditions listed under subsection (g) of this section.

Kerr-McGee plans to utilize water and tarps to minimize dust and emissions of particulate matter. No other control device is proposed.

(3) All emission points and area sources associated with each facility must be located at least 100 feet from any off-site receptor.

The emission points and area sources associated with the remediation activities are located at least 100 feet from any off-site receptor.

(g) Control devices. When a control device is used at a facility, the device must satisfy one of the following conditions. If a thermal control device is used, the products of fuel combustion (nitrogen oxides, sulfur dioxide, carbon monoxide, volatile organic compounds (VOC), or total inhalable particulate matter) are authorized if the facility is operated in compliance with this section, and all control devices must comply with applicable opacity restrictions in Chapter 111 of this title (relating to Control of Air Pollution from Visible Emissions and Particulate Matter).

No control device is proposed for the remediation activities.

(h) Fugitive emissions when no control device is used for remediation. In the cases where emission releases are not directly emitted from a control device or stack which can be sampled, compliance must be demonstrated by the use of a PID or FID initially and at least on a weekly basis. The FID or PID instrument chosen must be capable of properly detecting the types of contaminants present. Measurement should occur as close as possible to the remediation activity, but no further away than the nearest property line. The concentration measured must be equal to or less than the specific air contaminant's ESL. If an ESL is exceeded, remediation must cease until corrective action restores the concentration to below ESL values. The conversion from PID and FID devices to ESLs must use the following formula:

$\mu g/m^3$ = {(ppmv) (gram molecular weight of substance)} / .02445

Kerr-McGee plans to utilize water and tarps to minimize dust and fugitive emissions. Kerr-McGee hereby requests a waiver from this monitoring requirement since the site contains PCB contamination, which is non-volatile.

(i) Other regulatory requirements.

(1) Voluntary Cleanup Program. A state or local permit is not required for remediation conducted on a site as part of a voluntary cleanup. A voluntary cleanup must be coordinated with ongoing

(v) records of compliance with the emission rate limits of this section;

(vi) a record of the demonstration that the chosen control method is an appropriate choice for the site; and

(vii) a record of the return receipt demonstrating notification to the appropriate regional office, local air pollution control programs having jurisdiction over the site, and appropriate remediation program.

Kerr-McGee is requesting a waiver from the sampling or monitoring requirements of this PBR as the remediation site only contains PCB contamination, which is non-volatile. Kerr-McGee is also requesting a waiver from these associated recordkeeping requirements.

Remediation
Air Permits by Rule (PBR) Checklist
Title 30 Texas Administrative Code § 106.533

Rule	Check the Most Appropriate Answers and Fill in the Blanks	
(g)	**Control devices (continued)**	
(g)(5)	Will CAS consist of at least two activated carbon canisters that are connected in series?	☐ YES ☐ NO N/A
(g)(5)(A)	Prior to the use of a CAS at the site, will there be a demonstration that activated carbon is an appropriate choice for control of the contaminants at the site?	☐ YES ☐ NO N/A
(g)(5)(B)	Will the CAS be operated to minimize breakthrough and maintain compliance with the emission limits of this subsection?	☐ YES ☐ NO N/A
(g)(5)(B)	When the VOC breakthrough is detected in the outlet of the initial canister, will the waste gas flow be switched to the second canister immediately?	☐ YES ☐ NO N/A
(g)(5)(B)	Within four hours of detection of breakthrough, will a fresh canister be placed as the new final polishing canister?	☐ YES ☐ NO N/A
(g)(5)(B)	Will sufficient fresh activated carbon canisters be maintained at the site to ensure fresh polishing canisters are installed within four hours of detection of breakthrough?	☐ YES ☐ NO N/A
(g)(5)(C)(i)	Will the CAS be sampled initially (within two hours of startup) and periodically to determine breakthrough (defined as a measured VOC concentration of 100 parts per million by volume (ppmv) in the outlet of the initial canister)?	☐ YES ☐NO N/A
(g)(5)(C)(i)	Will the sampling point be at the outlet of the initial canister, but before the inlet to the second or final polishing canister?	☐ YES ☐ NO N/A
(g)(5)(C)(i)	Will sampling be performed while venting maximum emissions to the CAS (e.g., during loading of tank trucks, during tank filling, during process venting)?	☐ YES ☐ NO N/A
(g)(5)(C)(i)	Will the CAS be monitored on a weekly basis or 20% of the design carbon replacement interval, whichever is less?	☐ YES ☐ NO N/A
(g)(5)(C)(ii)	Will an FID or PID instrument capable of properly detecting the types of contaminants present be used for VOC sampling?	☐ YES ☐ NO N/A
(g)(5)(C)(iii)	At dry cleaning remediation sites, will additional sampling to determine total organics and speciated chlorinated compounds be performed initially (within two hours of startup) and at least monthly?	☐ YES ☐ NO N/A
(h)	**Fugitive emissions when no control device is used**	
(h)	Is a control device used for remediation? *If "NO," continue.* *If "YES," Subsection (h) does not apply.*	☐ YES ☒ NO
(h)	Whenever emission releases are not directly emitted from a control device or stack which can be sampled, will compliance with the emission limits be demonstrated by the use of a FID or PID?	☐ YES ☐ NO N/A – requesting waiver – non-volatile contaminant.
(h)	Will the FID or PID be used initially and on a weekly basis to demonstrate compliance with the emission limits?	☐ YES ☐ NO N/A

Remediation
Air Permits by Rule (PBR) Checklist
Title 30 Texas Administrative Code § 106.533

Rule	Check the Most Appropriate Answers and Fill in the Blanks	
(j)	**Administrative requirements**	
(j)(1)	Before starting remediation (pilot test or treatment), will the owner or operator notify the commission using **Form TCEQ 20122** (Regional Notification/Relocation Form)? [**Note:** *Notifications for multiple sites that are part of the same affected property may be submitted at the same time.*]	☒ YES ☐ NO
(j)(1)(B)	Will the notification be sent to the appropriate regional office, any local air pollution control program, and appropriate remediation program?	☒ YES ☐ NO
(j)(1)(C)	Will pilot test notifications be received by those listed in (j)(1)(B) above prior to the commencement of activities?	☒ YES ☐ NO
(j)(1)(D)	Will an updated or additional notification be received by those listed in (j)(1)(B) above prior to the commencement of activities?	☒YES ☐ NO
(j)(1)(D)	Will an updated or additional notification contain specific information concerning the basis (measured or calculated) for the expected emissions from the facility and explain details as to why the control device can be expected to perform as represented?	☒ YES ☐ NO
(j)(1)(E)	For any remediation project that changes or eliminates a represented control device during the lifetime of the project, will an amended notification be filed with those listed in (j)(1)(B) above as soon as practicable after the change and after confirmation with the appropriate remediation program?	☒ YES ☐ NO
(j)(2)(A)	Will records be maintained at the site or at the nearest staffed location, and made available upon request to personnel from the commission, any local agency having jurisdiction, or appropriate remediation program?	☒ YES ☐ NO
(j)(2)(A)	Will all of the following records be maintained? (Check which records are maintained). ☐ Sample time and date ☐ Monitoring results (ppmv) ☐ Process operations occurring at the time of sampling ☐ Documentation of any corrective action taken, including time and date of the action ☒ Records of compliance with emission rate limits ☐ Demonstration that the chosen control method is an appropriate choice for the site ☒ The return receipt of notification to the appropriate regional office, local air pollution control programs, and appropriate remediation program	☐ YES ☐ NO N/A, requesting waiver - non-volatile contaminant