Coterie
ENVIRONMENTAL

May 13, 2026

John Mikus
Project Manager
Industrial and Hazardous Waste Permits Section
Waste Permits Division (MC-130)
Texas Commission on Environmental Quality
12100 Park 35 Circle
Austin, Texas 78753

Re: BASF Corporation – Pasadena, Texas
Response to Technical Notice of Deficiency No. 2 for Permit Renewal Application
Hazardous Waste Permit No. 50385, Industrial Solid Waste Registration No. 33849
EPA ID No. TXD980808778, RN100225689, CN600124895, Tracking No. 32146039

Dear Mr. Mikus:

On behalf of BASF Corporation (BASF), Coterie Environmental LLC is providing responses to comments from the Texas Commission on Environmental Quality (TCEQ) email dated April 29, 02026, regarding the permit renewal application for Industrial and Hazardous Waste Permit No. 50385 for the BASF Pasadena facility.

The sections below follow the same order as they appear in TCEQ's application deficiencies table. Comments have been printed in italics and the corresponding responses are presented in bold print.

Response to TCEQ Comments

NT1. Part A, I. General Information, p. 1 (PDF p. 9), Typo, Enter EPA ID No. TXD980808778. The entered EPA ID No. TXD980909778 in the application is incorrect.

The error has been corrected. We have also corrected the error on several other pages of the application. (Revised pages 9, 48, 308, 311, and 312 of PDF)

NT2. Part B, Table I, L. Mayor, Appendix I., pp. 5 of 8 (PDF p. 52), 30 TAC 39.503(c)(2)(B), Local Officials List, Typo, The email for the mayor of Pasadena, Thomas Schoenbein, is entered as [redacted] *Confirm that this email is correct; there is an apparent typo in the last name in the email address.*

The error has been corrected. (Revised page 49 of PDF)

T1. Part B, V General Engineering Report, 2.3 Water Supplies, pp. 1-2 (PDF pp. 202-203), 40 CFR 270.14(b)(8)(iii), Incorrect, Detail what mechanism(s) are in place to protect the water source(s) for this facility from contamination.

Information on water sources has been added to Section 2.3 of the General Engineering Report. (Revised page 203 of the PDF)

T2. Part B, VII. Closure and Post-Closure Plans Attachment A: Closure Cost Estimate Calculations, pp 1-2 of 2 (PDF pp. 283-284), TCEQ Technical Guidance No. 10, Incomplete, The closure cost estimate detail supporting estimates of costs for closure is presented in two tables that appear to

be from a cost estimating application. Indicate by reference the source of this data/application and its version/date.

The closure cost calculations shown in Attachment A of the closure plan (Appendix VII.A) are not from a cost estimating application. These pages are from a simple spreadsheet specifically developed for the renewal application. There is no applicable reference or version.

We are providing electronic copies of clean and redline/strikeout pages showing the application revisions. One copy of the replacement pages, including new signature pages, will be submitted when requested. If you have questions, please feel free to contact Andrew Glover at (832) 835-4919 or [redacted] or me at (610) 406-2214 or [redacted]

Sincerely,

Coterie Environmental LLC

S. Heather McHale, P.E.
Principal

cc: Andrew Glover, BASF

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BASF CORPORATION

PASADENA, TEXAS

INDUSTRIAL AND HAZARDOUS WASTE STORAGE/PROCESSING/DISPOSAL FACILITY PERMIT NO. 50385 SOLID WASTE REGISTRATION NO. 33849 EPA ID NO. TXD980808778

PERMIT RENEWAL APPLICATION

NOVEMBER 2025
REVISED: MAY 2026

Coterie ENVIRONMENTAL

840 FIRST AVENUE, SUITE 400 • KING OF PRUSSIA, PA 19406
610.945.1777 • WWW.COTERIE-ENV.COM

PART A

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 Pasadena**
(Individual, Corporation, or Other Legal Entity Name)

TCEQ Solid Waste Registration No: **33849** EPA I.D. No.: **TXD980808778**

Street Address (If Available): **4403 Laporte Highway 225**

City: **Pasadena**, State: **TX** Zip Code: **77501**

County: **Harris**

Telephone Number: **281-884-4400** Charter Number: **0004205406**

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.

Contact – General:
Andrew Glover
Environmental Specialist
PO Box 687
Pasadena, TX 77501
Phone: 832-835-4919
Email: [redacted]

Contact – Application Information:
S. Heather McHale
Principal
Coterie Environmental LLC
840 First Avenue, Suite 400
King of Prussia, PA 19406
Phone: 610-406-2214
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.

CT Corporation Systems
1999 Bryan Street, Suite 900
Dallas, TX 75201-3136

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): **Abe Ahmed, 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 _____on this

_____ day of _____, _____.

My commission expires of the _____ day of _____, _____

_____
Notary Public in and for _____ County, Texas

PART B

A. Applicant: Facility Operator

Name [1]	BASF Corporation
Address [2]	4403 Laporte Highway 225
City, State [2]	Pasadena, TX
Zip Code [2]	77501
Telephone Number	281-884-4400
Alternate Telephone Number	None
TCEQ Solid Waste Registration No.	33849
EPA I.D. No.	TXD980808778
Permit No.	50385
County	Harris
Regulated Entity Name	BASF Pasadena
Regulated Entity Reference Number (RN)	RN100225689
Customer Name [2]	BASF Corporation
Customer Reference Number:	CN600124895
Charter Number [3]	0004205406
Previous or Former Names of the Facility (if applicable)	Not applicable

B. Facility Owner: Identify the Facility Owner if different than the Facility Operator [4]

☑ Same as Facility Operator?

Name	
Address	
City, State	
Zip Code	
Telephone Number	
Alternate Telephone Number	

G. Information Required to Provide Notice

H. State Officials List [30 TAC 39]

I. State Senator

Name:	Carol Alvarado
Address	P.O. Box 12068 Capitol Station
City, State	Austin, TX
Zip Code	78711
Email	[redacted]

J. State Representative

Name:	Mary Ann Perez
Address	P.O Box 12910
City, State	Austin, TX
Zip Code	78711
Email	[redacted]

K. Local Officials List [30 TAC 39]

L. Mayor

Name:	Thomas Schoenbein
Address	1149 Ellsworth Drive
City, State	Pasadena, TX
Zip Code	77506
Email	[redacted]

M. Local Health Authority

Name:	Kathy Perez-Ashton City of Pasadena Health Department
Address	1149 Ellsworth Drive
City, State	Pasadena, Texas
Zip Code	77506
Email	[redacted]

N. County Judge

Name:	Lina Hidalgo
Address	1001 Preston, Suite 911
City, State	Houston, TX
Zip Code	77002
Email	[redacted]

O. County Health Authority

Name:	Leah Barton, MBA, MA Harris County Public Health
Address	1111 Fannin Street
City, State	Houston, TX
Zip Code	77002
Email	[redacted]

Appendix I.C:
SIGNATURE PAGE

Signature Page

I, **Abe Ahmed** **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:_____ Date: _____

- -

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 _____

On this_____ day of_____,_____

My commission expires on the_____ day of_____, _____

Notary Public in and for_____ County, Texas

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

Appendix V.A:
GENERAL
(TABLE V.A AND GENERAL ENGINEERING REPORT)

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BASF CORPORATION

PASADENA, TEXAS

INDUSTRIAL AND HAZARDOUS WASTE STORAGE/PROCESSING/DISPOSAL FACILITY PERMIT NO. 50385 SOLID WASTE REGISTRATION NO. 33849 EPA ID NO. TXD980808778

GENERAL ENGINEERING REPORT

NOVEMBER 2025

REVISED: MAY 2026

contamination. Other standard procedures, such as managing the hazardous waste in tanks, cleaning up spills immediately, and maintaining the integrity of secondary containment, help prevent drinking water contamination.

The secondary containment is inspected daily by operations, as indicated in Table III.D in Section III of the Part B Permit Application. These inspections ensure that the concrete is maintained so that any spills will be contained. Any defects identified during inspections are entered into the maintenance notification system and assigned a priority level. The least severe issues are scheduled at the maintenance team's convenience, while more urgent issues require repair within two to three days.

Potable water for the BASF Pasadena Site is supplied from an onsite groundwater well. All connections to the potable water system are equipped with backflow preventers to avoid contamination. BASF uses the onsite groundwater well and supplemental water sources for process water supply. Water from these sources is pumped to the facility's water treatment systems, where it is treated, including disinfection with chlorine, prior to use. The treated water is discharged through a closed, pressurized system to a tank and basin that supply the onsite process water distribution system, which minimizes the potential for backflow and groundwater contamination.

2.4 Equipment and Power Failure

Power failure at the facility will not result in a release to the environment from the boiler. The plant is equipped with back-up battery power and an emergency generator to ensure a safe shutdown of the equipment without a release to the environment. If a power failure occurs, all operations at the facility will stop. Much of the facility equipment is designed to "fail safe" in case of power disruption or complete failure.

2.5 Personal Protection Equipment

During the handling of waste liquid fuel, personal protective equipment is worn (if the potential for exposure exists). Personal protective equipment consists of, at a minimum, flame resistant clothing (FRC), hard hats, steel-toed boots, protective eye wear, and impermeable gloves. Additional equipment may include chemical resistant boot covers, hearing protection, face shields, chemical goggles, impermeable full-body coveralls, as necessary. If the potential for vapor, mist, or dust generation exists, a properly fitted Mine Safety and Health Administration (MSHA) approved or National Institute for Occupational Safety and Health (NIOSH) approved respirator with appropriate cartridges is worn. For large spills, tank cleaning, or other confined-space entry, a supplied-air respiratory system is required.

Waste liquid fuel is managed as a flammable liquid. All sources of ignition are excluded when activities that could release flammable vapors are undertaken. Smoking is not permitted within the BASF Pasadena Site except in designated areas. ''No Smoking" signs are posted at all entries to the facility.

2.6 Procedures to Minimize Releases to the Atmosphere

The F-10 is operated in accordance with good engineering practices to minimize releases to the atmosphere. The waste liquid fuel is piped directly from the accumulation tank to the boiler, which minimizes the potential for spills. The combustion chamber is sealed to minimize fugitive emissions.

3.0 Traffic Patterns

In accordance with 40 CFR § 270.14(b)(10), this section provides information on the traffic patterns in and around the hazardous waste management area at the BASF Pasadena Site. Specifically, information is provided on the traffic pattern, estimated volumes, and control mechanisms.

Flow of traffic throughout the facility is regulated by access control at the Guard House, vehicle speed control, and various stop signs and directional signs. Vehicle traffic within the operational portion of the plant is mainly limited to semitrailers, forklift trucks, pickup trucks, and tractors and is restricted to a maximum speed of 9 miles per hour (mph). All personal vehicle traffic is confined to the parking lots.

Vehicle traffic includes tractor trailers, small vehicles, forklifts, and electric carts also contribute to the traffic in the plant. A breakdown of this traffic into the types and numbers of each type of vehicle is provided in Table 1.

Table 1
Vehicle Traffic Volume

Vehicle Type	Average Daily Volume
Small vehicles (pickups, cars, and vans)	6
Tractor trailers	6
Forklifts	4
Electric carts	2

4.0 Figures

In accordance with 40 CFR § 270.14(b)(19), this report contains a U.S. Geological Survey (USGS) topographic map of the site and an area of at least 1,000 feet around it in all directions. This map shows the topographic contours at an interval adequate to clearly show the pattern of surface water flow in the vicinity of and from each operational unit of the site. This map (Figure V.A.2) is provided using the required scale of one inch equals no more than 200 feet.

For clarity of the information presented, multiple figures have been provided to satisfy the general requirements of 40 CFR § 270.14(b)(19). These figures, when combined:

- Indicate the map's orientation, scale, and date;

- Show the legal boundaries of the hazardous waste management facility;
- Show all buildings, treatment, storage, and disposal operations, and other structures within the property boundary;
- Identify all operational units within the facility where hazardous waste is or will be treated, stored, or disposed;
- Show all access control points (*e.g.,* fences and gates);
- Identify all nearby surface waters;
- Define the 100-year floodplain area;
- Show stormwater drainage systems;
- Identify surrounding land use (*e.g.,* residential, commercial, agricultural, and recreational);
- Identify all onsite and offsite wells; and
- Provide a wind rose showing the predominant wind directions.

The following general maps and figures are included in Attachment A:

- Figure V.A.1 – Facility Plot Plan;
- Figure V.A.2 – 7.5-Minute Topographical Map;
- Figure V.A.3 – FEMA Flood Map;
- Figure V.A.4 – General Land Use Map;
- Figure V.A.5 – Wind Rose;
- Figure V.A.6 – Water Well Location Map;
- Figure V.A.7 – Fences and Gates; and
- Figure V.A.8 – Stormwater Drainage Systems.

Appendix IX.A:
PRELIMINARY REVIEW CHECKLISTS

Preliminary Review Facility Checklist

Facility	BASF Pasadena	City	Pasadena
ISW Reg. No.:	33849	Date	October 31, 2025
Permit No.	50385	Reviewer:	
EPA ID No.	TXD980808778		

A. Waste Management Units:

RCRA Regulated Units:

NOR. No.	Description	Status
006	Storage Tank D-74 (permit exempt)	Active
007	Container Storage Area (permit exempt)	Active
008	Storage Tank D-746 (permit exempt)	Active
009	Storage Tank D-668 (permit exempt)	Active
010	F-8 Boiler	Closed
011	Storage Tank D-749 (permit exempt)	Closed
014	Drum Storage Area at QC Lab (permit exempt)	Active
015	Misc. Container Storage at Maintenance Shop (permit exempt)	Active
016	Satellite Accumulation Containers at PA Unit (permit exempt)	Inactive
017	Satellite Accumulation Containers at 2-EH Unit (permit exempt)	Inactive
018	Satellite Accumulation Containers at Loading Area (permit exempt)	Inactive
020	Misc. Storage Containers (permit exempt)	Active
021	Bulk Storage Containers for Temporary Storage (permit exempt)	Active
022	Misc. Storage Containers (permit exempt)	Active

Preliminary Review Unit Checklist

Facility	BASF Pasadena	City	Pasadena
ISW Reg. No.:	33849	Date	November 4, 2025
Permit No.	50385	Reviewer:	
EPA ID No.	TXD980808778		

Waste Management Unit(s):

A. NOR No.:	031
B. Description:	T-80, F-10 Boiler
C. Dates of Operation:	2016 – Present
Wastes Managed:	0221219H D001, D018 OxoAlcohol process and Plasticizer process based waste liquid fuel
Evidence of Release:	None
Pollutant Dispersal Pathways:	Not applicable
Summary:	180 MMBtu/hr water-tube steam boiler. See Appendix V.I for description. No potential for releases.
Recommended Action:	None

Preliminary Review Unit Checklist

Facility	BASF Pasadena	City	Pasadena
ISW Reg. No.:	33849	Date	November 4, 2025
Permit No.	50385	Reviewer:	
EPA ID No.	TXD980808778		

Waste Management Unit(s):

A. NOR No.:	AOC3
B. Description:	Groundwater
C. Dates of Operation:	Not applicable
Wastes Managed:	None
Evidence of Release:	See affected property assessment report (APAR)
Pollutant Dispersal Pathways:	Groundwater
Summary:	Groundwater monitoring was conducted for AOC3. The monitoring program concluded in 2015 when it was determined that the chlorinated hydrocarbon plume had been documented to be stable or shrinking (TCEQ approval letter dated August 24, 2015).
Recommended Action:	None