From: [redacted]
Subject: RE: TECHNICAL NOD 1 Permit Renewal, BASF Pasadena,-Permit No. 50385,-Tracking No. 32146039
Date: Monday, January 12, 2026 1:48:42 PM
Attachments: BASF Pasadena - Part B Signature Page - November 2025.pdf

Mr. Mikus,

In response to Technical NOD 1, a copy of the Part B signature page is attached. We have also uploaded the complete application (with Part B signature) to TCEQ's FTPS site and shared with you and the IHW address.

The Part B signature page was inadvertently left out of the PDF copy that was uploaded when the application was submitted. The paper copy that was submitted included all required signatures.

If you have any questions, please do not hesitate to contact me.

Thanks,
Heather

S. Heather McHale, P.E.
Principal
Coterie Environmental LLC
610.406.2214
[redacted]

From: John Mikus [redacted]
Sent: Monday, January 12, 2026 14:33
To: [redacted]
Cc: S Heather McHale [redacted]
Subject: TECHNICAL NOD 1 Permit Renewal, BASF Pasadena,-Permit No. 50385,-Tracking No. 32146039

BASF Pasadena – Pasadena, Harris County
Hazardous Waste Permit No. 50385
Industrial Solid Waste Registration No. 33849
EPA Identification No. TXD980808778
Tracking No. 32146039; RN100225689/CN600124895

Dear Mr. Glover:

The Industrial and Hazardous Waste Permits Section staff of the Texas Commission on

Environmental Quality (TCEQ) reviewed your permit renewal application dated November 4, 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 below table follow the format of the TCEQ Part A and Part B hazardous waste permit application forms. Each deficiency is uniquely identified in the below table (NOD 1**)** 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

If a revision to the application causes text to shift and/or pagination to change, please provide all pages affected by the revision(s).

ID[1]	App. Part	App. Section	Location[1][2]	Citation	Error Type[3]	Deficiency Description/Resolution
1	B	List of Appendices	Appendix I.C Signature Page	N/A	Omitted	Signature page in the Part B was included but not signed, dated, and notarized. Provide a completed Part B signature page.

[[1]] Deficiency ID – Key: A#=Administrative deficiency (ex. A12); NT#=Non-Technical deficiency relating to more administrative in nature such as typo, format, etc. (ex. NT7); 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*) = *n*th 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.

Please submit your response (an unmarked copy and marked copy, for example in redline/strikeout format) via email for our review within 14 days of the date of this email. 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 and**]** IHW NOD responses, **must be sent as a paper copy to IHW including an original signature page(s)**.

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 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 direct questions regarding this email to Mr. John Mikus of the IHW Permits Section at (512) 239-5804 or by email at j[redacted]. If you respond in writing, please include mail code MC 130 in the mailing address.

Sincerely,

John Mikus
Project Manager
Industrial and Hazardous Waste Permits Section
Waste Permits Division
Texas Commission on Environmental Quality

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: x _____ Date: 11/3/25

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

_____

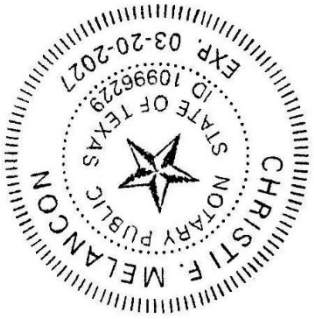
Signature

SUBSCRIBED AND SWORN to before me by the said Abe Ahmed

On this 3 day of November, 2025

My commission expires on the 20 day of March, 2027

Notary Public in and for Angelina County, Texas

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

Christi F. Melancon