

# STATE OF MAINE DEPARTMENT OF ENVIRONMENTAL PROTECTION 17 STATE HOUSE STATION AUGUSTA, MAINE 04333-0017

#### **DEPARTMENT ORDER**

Katahdin Railcar Services LLC Piscataquis County Milo, Maine A-1131-71-C-T Departmental
Findings of Fact and Order
Air Emission License
Transfer

#### FINDINGS OF FACT

After review of the file and related materials submitted with regard to the above noted application, pursuant to Title 38, Maine Revised Statutes (M.R.S.) § 590 and 06-096 Code of Maine Rules (C.M.R.) ch. 115, the Maine Department of Environmental Protection (the Department) finds the following facts:

#### I. Registration

#### A. Introduction

Katahdin Railcar Services LLC (KRS) has requested the transfer of Air Emission License A-1131 from Central Maine & Quebec Railway US Inc. (CMQR) to KRS through a letter to the Department dated July 16, 2020. Air Emission Licenses A-1131-71-A-N and A-1131-71-B-A were issued to CMQR on May 17, 2018 and November 4, 2019, respectively. The facility is a railcar cleaning and maintenance facility.

In late 2019, Soo Line Corporation (Soo Line) purchased Railroad Acquisition Holdings LLC through a merger with Soo Line's subsidiary, Black Bear Acquisition LLC. CMQR is a subsidiary of Railroad Acquisition Holdings LLC and was therefore also aquired through this transaction. Prior to the acquisition, KRS was a subsidiary of CMQR. However, Soo Line did not intend to also aquire KRS. In the Agreement and Plan of Merger supplied in the application, the definition of "Company Subsidiary" specifically excludes KRS, meaning KRS was spun off into its own independent company.

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#### B. Emissions Equipment

KRS has entered into a lease agreement with CMQR giving KRS the exclusive use of the car cleaning facility. The following equipment shall continue to be under the control of and operated by KRS:

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#### **Process Equipment**

Equipment	Pollution Control Equipment
Car Cleaning Lines #1 - #4	Flare #1
Paint Booths #1 - #2	Particulate Filters, HVLP Spray Guns
Grit Blast Booth #1	Baghouse

#### **Fuel Burning Equipment**

Equipment	Max. Capacity (MMBtu/hr)	Maximum Firing Rate (scfh)	Fuel Type	Date of Install.	Stack #
Boiler #1	4.1	1,594	Propane	2019	2
Flare #1	24.5	equivalent to 9,500	Propane (pilot)	2019	N/A

The following equipment is located on property retained for exclusive use by CMQR and will not be owned or operated by KRS. This equipment shall be removed from this license.

#### **Process Equipment**

Equipment	<b>Pollution Control Equipment</b>	
Parts Washer	N/A	

#### **Fuel Burning Equipment**

Equipment	Max. Capacity (MMBtu/hr)	Maximum Firing Rate (gal/hr)	Fuel Type, % sulfur	Date of Install.	Stack #
Furnace #1	1.3	9.2	Distillate fuel, 0.0015%	2011	1
Generator #1	2.7	20.0	Distillate fuel, 0.0015%	1969	N/A

Due to the size of the furnace, generator, and parts washer, CMQR is not required to obtain an air emission license at this time. However, CMQR is still responsible for complying with any applicable state and federal regulations that apply to the individual units.

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#### **II.** Transfer Requirements

#### A. Title, Right, or Interest

KRS operates the facility through a lease agreement with CMQR which was provided with the transfer application. The parties have provided sufficient evidence of title, right, or interest in the facility to allow the transfer of the facility's licenses.

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#### B. Technical Capacity and Intent

KRS's acquisition of the facility is not expected to result in any significant change in employees who currently operate equipment and conduct activities related to air emissions from the facility. Additionally, KRS states that they have retained an environmental consulting firm to assist them with maintining compliance with environmental, health, and safety regulations. The information submitted in the application provides sufficient evidence that KRS has the technical capacity and intent to comply with their air emission license.

#### C. Full Name and Address

The full name and address of the new owner is:

Katahdin Railcar Services 700 Main St, Suite 3 Bangor, ME 04401

#### D. Certification

KRS certifies that there will be no increase in air emissions beyond that provided for in the existing licenses, either in quantity or type.

#### E. Annual Emissions

The table below provides an estimate of facility-wide annual emissions for the purposes of calculating the facility's annual air license fee. Only licensed equipment is included, i.e., emissions from insignificant activities are excluded. Similarly, unquantifiable fugitive particulate matter emissions are not included. Maximum potential emissions were calculated based on the following assumptions:

- Operation of Boiler #1 and Flare #1 for 8,760 hours/year; and
- Compliance with facility-wide limits for SO<sub>2</sub>, VOC, and HAP.

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Please note, this information provides the basis for fee calculation <u>only</u> and should not be construed to represent a comprehensive list of license restrictions or permissions. That information is provided in the Order section of this license.

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## Total Licensed Annual Emissions for the Facility Tons/year

(used to calculate the annual license fee)

	PM	PM <sub>10</sub>	SO <sub>2</sub>	NO <sub>x</sub>	CO	VOC
Boiler #1	0.9	0.9	-	2.6	1.5	_
Flare #1	5.4	5.4	_	7.3	33.3	_
Facility	_	_	10.0	_	_	49.9
Total TPY	6.3	6.3	10.0	9.9	34.8	49.9

Pollutant	Tons/year
Single HAP	9.9
Total HAP	24.9

#### **ORDER**

Based on the above, the Department concludes that the applicant for the air emission license transfer has the capacity to satisfy all applicable statutory criteria and hereby APPROVES the transfer of Air Emission Licenses A-1131-71-A-N and A-1131-71-B-A from CMQR to KRS, subject to all conditions attached to them as well as the following conditions.

<u>Severability</u>. The invalidity or unenforceability of any provision of this License Transfer or part thereof shall not affect the remainder of the provision or any other provisions. This License Transfer shall be construed and enforced in all respects as if such invalid or unenforceable provision or part thereof had been omitted.

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#### **SPECIFIC CONDITIONS**

For clarity and consitancy the following Conditions replace ALL previous Specific Conditions of Air Emission Licenses A-1131-71-A-N and A-1131-71-B-A.

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#### (16) **Boiler #1**

A. Emissions shall not exceed the following:

Emission			
Unit	Pollutant	lb/MMBtu	Origin and Authority
Boiler #1	PM	0.05	06-096 C.M.R. ch. 115, BPT

B. Emissions shall not exceed the following [06-096 C.M.R. ch. 115, BPT]:

Emission	PM	PM <sub>10</sub>	SO <sub>2</sub>	NOx	CO	VOC
Unit	(lb/hr)	(lb/hr)	(lb/hr)	(lb/hr)	(lb/hr)	(lb/hr)
Boiler #1	0.21	0.21	_	0.58	0.34	0.04

C. Visible emissions from Boiler #1 shall not exceed 10% opacity on a six-minute block average basis. [06-096 C.M.R. ch. 115, BPT]

#### (17) **Car Cleaning Lines #1 - #4**

- A. Before commencing cleaning operations on a railcar, KRS shall determine the commodity most recently carried by the railcar. [06-096 C.M.R. ch. 115, BPT]
- B. KRS shall not clean railcars which most recently carried commodities not included in Appendix Lists 1 or 2 without prior written approval by the Department. The Department may require KRS to apply for a license modification, including a detailed BACT analysis, to add commodities to a list. [06-096 C.M.R. ch. 115, BPT]
- C. KRS shall not clean railcars which most recently carried a material with a Reportable Quantity (RQ) less than or equal to 10 pounds per *Designation*, *Reportable Quantities*, and *Notification*, 40 C.F.R. Part 302.4 or *Emergency Planning and Notification*, 40 C.F.R. Part 355, Appendix A. [06-096 C.M.R. ch. 115, BPT]
- D. KRS shall comply with the following work practice standards for all railcars cleaned.
  - 1. Prior to the Cleaning Process, the manways and other appurtenances shall remain closed and sealed.
  - 2. To the amount practicable, each railcar shall be thoroughly drained of liquids prior to the Cleaning Process.

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3. All VOC/HAP containing liquids drained from the railcar prior to cleaning shall be collected and stored in closed, air-tight containers.

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- 4. The cleaning solutions used shall consist of steam, hot or cold water, and low-VOC (<5% by weight) containing detergents.
- 5. During the Cleaning Operations, exhaust from railcars shall be vented through the Vapor Reduction System.
- 6. The Vapor Reduction System shall be maintained in good working order per the manufacturer's written specifications.
- 7. KRS shall perform monthly inspections of Flare #1 and the Vapor Reduction System to check for leaks, carbon breakthrough, or other malfunctions. [06-096 C.M.R. ch. 115, BPT]

#### E. List 2 Commodities

- 1. When processing railcars whose most recent commodity carried is on Appendix List 2, KRS shall purge the railcar with nitrogen and direct all vapors from the purge to Flare #1 until the atmosphere inside the railcar measures 0% LEL. [06-096 C.M.R. ch. 115, BPT]
- 2. The pilot for Flare #1 shall be lit prior to commencing purging of any railcar being vented to it. [06-096 C.M.R. ch. 115, BPT]
- 3. Flare #1 shall be equipped with continuously burning pilots and an automatic re-ignition system. The presence of the pilot flame shall be monitored using a thermocouple or equivalent device. An infrared monitor is considered equivalent to a thermocouple for pilot flame monitoring purposes. [06-096 C.M.R. ch. 115, BPT]
- 4. Emissions shall not exceed the following:

Emission Unit	Pollutant	lb/MMBtu	Origin and Authority
Flare #1	PM	0.05	06-096 C.M.R. ch. 115, BPT

5. Emissions shall not exceed the following [06-096 C.M.R. ch. 115, BPT]:

	PM	PM <sub>10</sub>	NO <sub>x</sub>	CO
<b>Emission Unit</b>	(lb/hr)	(lb/hr)	(lb/hr)	(lb/hr)
Flare #1	1.23	1.23	1.67	7.61

6. Visible emissions from Flare #1 shall not exceed 10% opacity on a six-minute block average basis. [06-096 C.M.R. ch. 115, BPT]

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F. Compliance with the requirements for Car Cleaning Lines #1 - #4 shall be demonstrated by the following recordkeeping [06-096 C.M.R. ch. 115, BPT]:

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- 1. Logs of each railcar cleaned including:
  - a. Date and time the purging began and ended;
  - b. Last material the railcar carried and whether it is a List 1 or List 2 commodity;
  - c. Whether or not the railcar purge was controlled by Flare #1;
  - d. If controlled by Flare #1, logs indicating staff checked that the flare pilot was lit prior to commencing purging of the railcar;
  - e. Whether the last material the railcar carried contained sulfur compounds (only for railcars sent to Flare #1);
  - f. Volume of the railcar vapor space;
  - g. Final LEL reading when purging ended (List 2 materials only);
  - h. Whether or not the Vapor Reduction System was utilized during cleaning.
- 2. Records of the liquid collected and final disposition of the material (e.g. shipped off-site) including dates and the amount of each material.
- 3. Amount of propane (gallons) purchased for use in Flare #1 on a monthly basis.
- 4. Hours of operation for Flare #1 on a monthly basis.
- 5. Records of monthly inspections and any maintenance activities (planned or unplanned) performed on Flare #1 and the Vapor Reduction System including the dates the carbon is replaced.
- 6. Records of any calibration and maintenance activities performed on the explosimeter.
- 7. Monthly calculations of the VOC and HAP emissions from the railcar cleaning process. Emissions for all railcars (Lists 1 and 2) cleaned per month shall be summed to provide the monthly total. Emissions shall be based on calculated working losses from the railcar through use of EPA's TANKS program and the assumed combined capture and control efficiency (e.g., 0% for List 1 commodities, 98% for List 2 commodities).
- 8. Monthly calculations of the SO<sub>2</sub> emissions from the railcar cleaning process. Emissions of all railcars containing sulfur compounds which were sent to Flare #1 shall be summed to provide the monthly total.

#### (18) **Paint Booths #1 and #2**

- A. Paint Booths #1 and #2 shall each be equipped with filters for control of emissions of PM. KRS shall maintain the filters so as to minimize PM emissions. [06-096 C.M.R. ch. 115, BPT]
- B. Visible emissions from Paint Booths #1 and #2 shall each not exceed 10% opacity on a six-minute block average basis. [06-096 C.M.R. ch. 115, BPT]

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- C. KRS shall use only HVLP spray guns in Paint Booths #1 and #2. [06-096 C.M.R. ch. 115, BPT]
- D. KRS shall only use coatings with a VOC content equal to or less than 0.42 kg VOC/liter (3.5 lb VOC/gal) as applied, excluding water and exempt compounds except for the following:

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- 1. KRS may use up to a total of 50 gallons of coating that exceeds the VOC emission limit above in any 12-month period. [06-096 C.M.R. ch. 129, § 4(G)]
- 2. The VOC emission limit above does not apply to stencil coatings and safety-indicating coatings.

[06-096 C.M.R. ch. 129, § 4(F)(5), Table 1]

- E. KRS is subject to the following work practice standards [06-096 C.M.R. ch. 129, § 5]:
  - 1. Vapor-tight containers shall be used for the storage of spent or fresh VOC and for the storage or disposal of cloth or paper impregnated with VOC that are used for surface preparation, clean up or coating removal.

#### 2. Cleanup Operations

- a. The use of VOC is prohibited for cleanup operations unless equipment is used to collect the cleaning compounds and to minimize their evaporation to the atmosphere.
- b. KRS shall collect all organic solvent used to clean spray guns into a normally closed container.
- c. KRS shall pump or drain all organic solvent used for line cleaning into a normally closed container.
- d. KRS shall not use compounds containing more than 8.0 percent by weight of VOC for cleaning spray booth components other than conveyers, continuous coaters and their enclosures, and/or metal filters, unless the spray booth is being refurbished. If the spray booth is being refurbished, that is, the spray booth coating or other material used to cover the booth is being replaced, KRS may not use more than 1.0 gallon of organic solvent to prepare the booth prior to applying the booth coating.
- e. KRS shall control emissions from washoff operations by:
  - (1) Using normally closed tanks for washoff; and
  - (2) Minimizing dripping by tilting or rotating the part to drain as much organic solvent as possible.

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#### F. Recordkeeping and Reporting

1. KRS shall submit to the Department an initial compliance certification upon startup of each paint booth. [06-096 C.M.R. ch. 129 § 7(A)]

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- 2. The initial certification shall contain the following information:
  - a. Name and location of the facility;
  - b. Name, address, and telephone number of the facility's Responsible Official;
  - c. Identification of each coating used;
  - d. The mass of VOC per volume of each coating (e.g. lb VOC/gal), excluding water and exempt compounds, as applied, expected to be used each day in each paint booth; and
  - e. The time at which the facility's "day" begins if a time other than midnight is used to define a "day."

[06-096 C.M.R. ch. 129, § 7(A)(2)]

- 3. KRS shall keep records of the following:
  - a. Name and identification of each coating. [06-096 C.M.R. ch. 129, § 7(B)(2)]
  - b. Mass of VOC per volume (e.g. lb VOC/gal), excluding water and exempt compounds, as applied for each coating. [06-096 C.M.R. ch. 129, § 7(B)(2)]
  - c. Amount (gallons) of each coating used each month.
  - d. Amount (gallons) of each coating used on a monthly and 12-month rolling total basis which does not meet the VOC content limit and whether it is an exempt coating such as a stencil coating or safety-indicating coating.
  - e. VOC/HAP content of each coating.
  - f. Total emissions of VOC and individual and total emissions of HAP from the paint booths on a monthly and 12-month rolling total basis.
  - g. Records of any maintenance activities (planned or unplanned) performed on the paint booths including filter replacements.

[06-096 C.M.R. ch. 115, BACT (except where noted)]

- 4. KRS shall notify the Department in writing within thirty (30) calendar days of the use of any coatings that do not meet the VOC content limit except for the following:
  - a. The first 50 gallons per continuous 12-month rolling period; and [06-096 C.M.R. ch. 129, § 4(G)]
  - b. Exempt coatings including stencil coatings and safety-indicating coatings. [06-096 C.M.R. ch. 129, § 4(F)(5)(Table 1 notes)]

[06-096 C.M.R. ch. 129, § 8(B)(2)]

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#### (19) **Grit Blast Booth #1**

A. KRS shall operate and maintain a baghouse on Grit Blast Booth #1 so as to minimize PM emissions. [06-096 C.M.R. ch. 115, BPT]

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- B. When in operation, Grit Blast Booth #1 shall be closed and vented to the baghouse. [06-096 C.M.R. ch. 115, BPT]
- C. Visible emissions from Grit Blast Booth #1 shall not exceed 10% opacity on a six-minute block average basis. [06-096 C.M.R. ch. 115, BPT]
- D. KRS shall perform monthly inspections of Grit Blast Booth #1 and its associated baghouse to check for leaks or other malfunctions. Records shall be kept of monthly inspections and any maintenance activities (planned or unplanned) performed on the baghouse. [06-096 C.M.R. ch. 115, BPT]

#### (20) Annual Emission Limits

- A. Total facility-wide annual emissions of SO<sub>2</sub> shall not exceed 10.0 tpy on a 12-month rolling total basis. Compliance with this limit shall be demonstrated through recordkeeping required by this license. [06-096 C.M.R. ch. 115, BPT]
- B. Total facility-wide annual emissions of VOC shall not exceed 49.9 tpy on a 12-month rolling total basis. Compliance with this limit shall be demonstrated through recordkeeping required by this license. [06-096 C.M.R. ch. 115, BPT]
- C. Facility-wide annual emissions of HAP shall not exceed 9.9 tpy on a 12-month rolling total basis for any single HAP and 24.9 tpy on a 12-month rolling total basis for all HAP combined. Compliance with these limits shall be demonstrated through recordkeeping required by this license. [06-096 C.M.R. ch. 115, BPT]
- D. Emissions of SO<sub>2</sub>, VOC, and HAP from Boiler #1 are determined to be negligible and are not required to be included as part of the annual facility-wide emissions for compliance purposes. [06-096 C.M.R. ch. 115, BPT]

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#### (21) **Fugitive Emissions**

Visible emissions from a fugitive emission source (including stockpiles and roadways) shall not exceed 20% opacity on a five-minute block average basis. [06-096 C.M.R. ch. 115, BPT]

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#### (22) General Process Sources

Visible emissions from any general process source shall not exceed 20% opacity on a six-minute block average basis. [06-096 C.M.R. ch. 115, BPT]

#### (23) Annual Emission Statement

- A. In accordance with *Emission Statements*, 06-096 C.M.R. ch. 137, KRS shall annually report to the Department, in a format prescribed by the Department, the information necessary to accurately update the State's emission inventory. The emission statement shall be submitted as specified by the date in 06-096 C.M.R. ch. 137.
- B. KRS shall keep the following records in order to comply with 06-096 C.M.R. ch. 137:
  - 1. The amount of propane purchased for or fired in Boiler #1 on a calendar year basis;
  - 2. The amount of propane pilot fuel purchased for or fired in Flare #1 on a monthly and calendar year basis;
  - 3. Hours of operation of Flare #1 on a monthly and calendar year basis; (for calculation of emissions of products of combustion)
  - 4. Monthly calculations of the SO<sub>2</sub>, VOC, and HAP emissions from the railcar cleaning process;
  - 5. Monthly calculations of the VOC and HAP emissions from the paint booths; and
  - 6. Annual hours of operation for each emission unit on a calendar year basis.

[06-096 C.M.R. ch. 137]

C. Beginning with reporting year 2020 and every third year thereafter, KRS shall report to the Department emissions of hazardous air pollutants as required by 06-096 C.M.R. ch. 137, § (3)(C). KRS shall pay the annual air quality surcharge, calculated by the Department based on these reported emissions of hazardous air pollutants, by the date required in Title 38 M.R.S. § 353-A(3). [38 M.R.S. § 353-A(1-A)]

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(24) CMQ shall notify the Department within 48 hours and submit a report to the Department on a <u>quarterly basis</u> if a malfunction or breakdown in any component causes a violation of any emission standard (38 M.R.S. § 605).

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Done and dated in augusta, maine this  $2^{nd}$  day of SEPTEMBER, 2020.

DEPARTMENT OF ENVIRONMENTAL PROTECTION

BY:\_

GERALD D. REID, COMMISSIONER

The term of this amendment shall be concurrent with the term of Air Emission License A-1131-71-A-N.

for

PLEASE NOTE ATTACHED SHEET FOR GUIDANCE ON APPEAL PROCEDURES

Date of initial receipt of application: 7/16/2020
Date of application acceptance: 7/21/2020

Date filed with the Board of Environmental Protection:

This Order prepared by Lynn Muzzey, Bureau of Air Quality.

#### FILED

SEP 2, 2020

State of Maine Board of Environmental Protection

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STCC <sup>1</sup>	Commodity	Common Name or Type of Chemical Product	CAS No.	RQ (lbs)
(If Known) 4912269	Commodity	Type of Chemical Product	CAS No.	(108)
4912209				
4912330		#2 through #6 fuel oil and		
4914170	Fuel Oil	diesel fuel	various	None
7717170	Latex (liquid rubber)	diesei idei	various	TVOIC
2821245	synthetic	Latex	None	None
2021243	Polyacrylamide-water	Latex	TAORE	TVOILC
2899834	solution	Polymer	None	None
2077034	Additives Fuel Oil Gasoline	Fuel or lubricating oil	Tione	TTOILE
2899885	or Lubricating Oil	additives	Various	None
2077003	Kaolin & Water Slurry		1332-58-7	
3295230	Kaolin & Water Starry  Kaolin	Kaolin	1318-74-7	None
3273230	Kaomi	Sodium Chlorate (solid	1310 / 1 /	
4918723	Sodium Chlorate	powder)	7775-09-9	None
1910725		Asphalt	1115 07 7	TYONE
4961605	Heated Asphalt	Roofing Flux	8052-42-4	None
1311110	Petroleum Oil Crude Oil or	Rooming Flux	0032 12 1	TVOILE
1441314	Shale Oil Crude			
4910164	Sand Industrial Oil or Gas	1		
4910165	Well Fracture	Crude Oil with a vapor	None	None
4910187	Petroleum Crude	pressure <0.5 psi		
4910191				
4910599	Petroleum Sour			
	Industrial Sand Ungrounded			
1441310	and Unbonded	Sand	Various	None
1471510	Rock Salt	Rock Salt	14762-51-7	None
1491970	Perlite Rock	Perlite Rock (solid)	None	None
2046115	Corn Syrup (Glucose)	Corn Syrup	Various	None
2093342	Rapeseed Oil	Rapeseed Oil	None	None
2812355	Sodium Sulfate (Salt Cake)	Sodium Sulfate (solid)	Various	None
2812534	Potassium Chloride	Potassium Chloride	7447-40-7	None
2011000	Paraffin Wax or Petroleum	Wax	Various	None
2911990	Wax Coment Clinker			
3241110	Cement Clinker	Cement (solid)	Various	None
3241115	Cement Hydraulic Portland	` ′		
2205056	Limestone Slurry Consisting	T im a	Variana	N.
3295956	of Ground Limestone	Lime	Various	None
4918311	Ammonium Nitrate	Ammonium Nitrate	6484-52-2	None
4020040	Hydrochloric Acid	Hydrochloric Acid	7647-01-0	5,000
4930040	Sulfuric Acid	Sulfuric Acid	7664-93-9	1,000

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STCC <sup>1</sup>	C	Common Name or	CAGN	RQ
(If Known)	Commodity	Type of Chemical Product	CAS No.	(lbs)
4025240	Sodium Hydroxide (Caustic	Codium Hydrovida (colid)	1210 72 2	1 000
4935240	Soda)	Sodium Hydroxide (solid)	1310-73-2	1,000
		Water-based processing aid for industrial operations, no		
		hazardous substances, no flash		
	Axperse	point	None	None
	Crystalline Silica	Silica	None	None
	Crystamme Smca	Styrene-butadiene based	None	None
	Diammonium Sulfate	•	Trade Secret	None
	(Trinseo for RAP 740NA	polymer (45-55%)	7783-20-2	None
	Latex)	Diammonium sulfate (<1.5%)		
	L -4 LVC 902E NA	Water (45-55%)	7732-18-15	None
	Latex LXC 803F NA –			
	Trinseo	Styrene-butadiene based	Trade Secret	3.7
	CP 615 NA Latex – Trinseo	polymer (45-55%)	7732-18-15	None
	XU 31719.00 Experimental	Water (45-55%)		
	Latex – Trinseo			
	XU 31032.50 Experimental			
	Latex – Trinseo			
		Processing aid for industrial		
		operations, no hazardous		
		substances, water-based, no		
	Flosperse	flash point	None	None
	Quartz	Quartz	14808-60-7	None
	Tetrasodium Salt	Acetic acid	64-02-8	None
	Amres 1110-E Wet Strength			
	Resin (water-based, no flash			
	point)		Various	None
	NovaCote 1936HS Surface			
	Sizeing Agent (water-based,			
	no flash point)		Various	None
	Precipitated Calcium			
	Carbonate		471-34-1	None
	Digitall 9708.1 (paper	Water (55-75%)		
	coating solution)	Polymers (25-45%)	Trade Secret	None
	Taflonol UMS Series Liquid	Brightener (10-30%)	16470-24-9	
		Water (70-90%)	7732-18-5	None
	Formaldehyde Solutions with			
	vapor pressure <0.05 psi		50-00-0	100
	YaraVera Urea 46-0-0	Urea	57-13-6	None

<sup>&</sup>lt;sup>1</sup> Standard Transportation Commodity Code

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STCC <sup>1</sup>		Common Name or	G.1.G.3.7	RQ
(If Known)	Commodity	Type of Chemical Product	CAS No.	(lbs)
2818414				
2818417				
2818445				
2818446				
4908170				
4908179	Ethanol			
4908180	– Ethyl Alcohol Anhydrous			
4909117				
4909152	Denatured			
4909159	– Alcohol Beverage			
4909363				
4910240	Ethanol Gas			
4914105				
2085120	Denatured Alcohol	Ethanol	64-17-5	None
	Fatty Acid Esters of			
	Vegetable Fish or Animal			
2899415				
4909230	Methanol	Methanol	67-56-1	5,000
	Methyl Esters (Methyl			
	Soyate) Diesel from			
2899416	Vegetable oil	Methyl Esters	Various	1,000
2911976	Petroleum Condensate	Natural Gas Condensate	Various	None
	Motor Fuel NEC Liquid			
	(Blends of Alcohol and			
2991240	Motor Fuel)	Gasoline	Various	None
4905419				
4905421				
4905423				
4905424				
4905752				
4905784				
4907603		Propane / Odorized Propane	74-98-6	
4909105		Butane	106-97-8	
4910236	Liquefied Petroleum Gas	Ethane	74-84-0	None
4906620	Propylene Oxide	Propylene Oxide	75-56-9	100
4907250	Methyl Methacrylate	Methyl Methacrylate	80-62-6	1,000
4907265	Styrene Monomer	Styrene Monomer	100-42-5	1,000
4912215	Butyl Acrylate	Butyl Acrylate	Various	None

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STCC <sup>1</sup>	C	Common Name or	CACN	RQ
(If Known)	Commodity	Type of Chemical Product	CAS No.	(lbs)
	Natural Gas	Natural Gas / Methane	74-82-8	None
	Isobutane	Isobutane	75-28-5	None
		Propylene (75-80%)	115-07-1	None
	P-P Mix	Propane (0-3%)	74-98-6	None
	Formaldehyde Solutions with vapor pressure ≥0.05 psi		50-00-0	100
1311110 1441314 4910164	Petroleum Oil Crude Oil or Shale Oil Crude Sand Industrial Oil or Gas	Crude Oil with a vapor pressure ≥0.5 psi	None	None
4910165 4910187	Well Fracture Petroleum Crude			
4910191 4910599	Petroleum Sour			

<sup>&</sup>lt;sup>1</sup> Standard Transportation Commodity Code