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TEXAS NATURAL RESOURCE CONSERVATION COMMISSION
COUNTY ENGINEER
Protecting Texas by Reducing and Preventing Pollution

March 1, 2000

CERTIFIED MAIL Nº Z 278 768 055
RETURN RECEIPT REQUESTED

Mr. Neal Olsen
Manager - Environmental Affairs
Dyno Nobel Inc.
Eleventh Floor, Crossroads Tower
Salt Lake City, Utah 84144-0103

Re: EDWARDS AQUIFER, Comal County
PROJECT: Dyno Nobel Site, Project numbers -1769.01 (& -1770), Located approximately 2½ miles north of IH-35 and 2 miles east of Solms Road, New Braunfels, Comal County, Texas
TYPE: Water Pollution Abatement Plan; 30 Texas Administrative Code (TAC) §213.5(b); Edwards Aquifer Protection Program

Dear Mr. Olsen:

The Texas Natural Resource Conservation Commission (TNRCC) received your two phase request to relocate two existing ammonium nitrate storage bins located on the referenced site. The request was submitted on behalf of Dyno Nobel Inc. and received by the San Antonio office on February 22, 2000. As understood, remediation efforts for a recent diesel spill require you to remove and relocate the existing bins, and you wish to continue serving your customers.

The TNRCC agrees that your remediation efforts should continue and hereby approve the temporary relocation of the ammonium nitrate storage bins as described in your letter dated February 22, 2000 (enclosed).

Permanent relocation of the ammonium nitrate storage bins is a modification to the water pollution abatement plan approved by letter dated July 26, 1993, to your predecessor (Strawn Explosives), and requires prior approval from the TNRCC. The Edwards Aquifer Protection Program rules (30 TAC Chapter 213) and appropriate application forms are available at "<http://www.tnrcc.state.tx.us/EAPP>" on the Internet. They are also available by request from the San Antonio Regional Office of the TNRCC.

The water pollution abatement plan (WPAP) approval letter dated July 26, 1993, (enclosed), has been reviewed and the following information is requested:

1. Proof of deed recordation (Standard Condition #1).
2. Construction notification (Standard Condition #2).

REPLY TO: REGION 13 • 140 HEIMER RD., STE. 360 • SAN ANTONIO, TEXAS 78232-5042 • 210/490-3096 • FAX 210/545-4329

P.O. Box 13087 • Austin, Texas 78711-3087 • 512/239-1000 • Internet address: www.tnrcc.state.tx.us

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Mr. Neal Olsen
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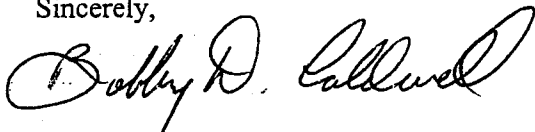
3. Copy of TNRCC (formerly Texas Water Commission) authorization for current access road to site.

The aboveground storage tank (AST) plan approval letter dated July 5, 1993, (misdated July 5, 1992) (enclosed), has been reviewed and the following information is requested:

1. Date of construction of originally approved AST containment structure by Strawn Explosives, Inc.
2. "As-built" plans (Special Condition #3).
3. Written statement from Strawn Explosives, Inc. certifying that the containment has been installed as approved.
4. Date of reconstruction of AST containment structure by Dyno Nobel.
5. Internal dimensions and total volume of the containment structure
6. Copy of the TNRCC's approval letter for any modifications per Standard Condition #4.
7. Construction notification (Standard Condition #6).
8. Date of transfer of ownership of Strawn Explosives to Dyno Nobel, Inc (Standard Condition #8).

Please provide the requested information by March 24, 2000. Should clarification of this letter be desired or if we may be of any other assistance, please contact John Mauser of our San Antonio office at 210/403-4024. Please reference project numbers -1769.01 (& -1770).

Sincerely,



Bobby D. Caldwell,
Water Section Manager
San Antonio Region Office
Texas Natural Resource Conservation Commission

BDC/JKM/eg

Enclosures: 2/22/2000 letter from Dyno Nobel to TNRCC
7/26/93 WPAP approval letter from TWC to Strawn Explosives, Inc.
7/5/93 AST approval letter (misdated 7/5/92) from TWC to Strawn Explosives, Inc.

cc with enclosures:

David Mims, Dyno Nobel Inc.
Tom Hornseth, Comal County
Greg Ellis, Edwards Aquifer Authority
TNRCC Field Operations, Austin