



**ISP ELASTOMERS**

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August 29, 2007

TCEQ Toxicology Section  
MC-168, P.O. Box 13087  
Austin, Texas 78711-3087

Re: Proposed 1,3-Butadiene Development Support Document

To Whom It May Concern:

Pursuant to the information and materials presented in TCEQ's August 22, 2007 public information session, ISP Elastomers, L.P. (ISP) is pleased to provide comments on TCEQ's Proposed August 2007 1,3-Butadiene Development Support Document (DSD). ISP commends TCEQ's continued efforts to refine its approach to the development and application of ESLs and ReVs, especially with regards to its outreach to the public and the regulated community.


ISP owns and operates two manufacturing facilities in Texas that operate under authority of various New Source Review (NSR) air quality permits. The 1,3-Butadiene ESLs and ReVs routinely play an important role in the NSR permitting for these sites in that they are tools used by TCEQ to ensure that ISP's plants are operated in a manner that is protective of human health and the environment. Accordingly, ISP has kept abreast of TCEQ's efforts in this regard, and in June 2006 provided comments to TCEQ on its draft "Guidelines to Develop ESLs, ReVs and URFs".

ISP's additional comments at this point in time are limited to stating our general support of the methodology employed by TCEQ in developing the Proposed 1,3-Butadiene DSD, and of the overall format and content of the DSD document. As mentioned in our earlier June 2006 comments, ISP supports the use of ESLs as a conservative screening tool in the permitting process but believes clearer documentation on the basis used to develop ESLs and ReVs, and the roles each of these values play in TCEQ's air quality control program would be useful, especially when dealing with air pollutant watch list (APWL) areas. Based on our initial review of the proposed DSD, and TCEQ's presentation on August 22<sup>nd</sup>, we believe TCEQ has indeed provided much clearer documentation on these matters. In particular, the proposed DSD provides extensive narrative of TCEQ's analytical approach, references for key data and assumptions, and provides clear and useful summary tables of the proposed ESLs and ReVs. In short, we believe the documentation and rationale provided in the proposed DSD provides a strong and supportable scientific basis for the proposed ESLs and ReVs contained in the report.

ISP appreciates TCEQ providing the opportunity to comment on this important initiative and we look forward to providing additional comments after the peer review group has issued their report later this year.

Sincerely,

ISP SYNTHETIC ELASTOMERS LP

  
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