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TCEQ Permit No. 50163
TCEQ Docket No. 2006-1904-IHW

CHIEF CLERKS OFFICE

Application by Safety-Kleen Systems, Inc.
For Renewal and Amendment of
IHW Permit No. 50163

Before the
Texas Commission on
Environmental Quality

EXECUTIVE DIRECTOR'S RESPONSE TO HEARING REQUESTS

The Executive Director of the Texas Commission on Environmental Quality (TCEQ) files this response to the hearing requests on the application by Safety-Kleen Systems, Inc., (Safety-Kleen) for renewal and amendment of IHW Permit No. 50163. The Executive Director received timely hearing requests from the following persons:

Citizens for Healthy Growth (CHG), represented by Edward B. Soph
Delores Olmon
E. Parks Olmon
Joy Powell
Dee Wooten

The Executive Director has attached the following items to this response:

Attachment A	Draft Permit
Attachment B	Technical Summary and Executive Director's Preliminary Decision
Attachment C	Safety-Kleen's Compliance History
Attachment D	Executive Director's Response to Public Comment
Attachment E	Map

The Executive Director provided copies of this response to the requestors.

I. DESCRIPTION OF THE APPLICATION

A. Description of the Facility

The Safety-Kleen facility is located at 1702 Cooper Creek Road, one-quarter mile north of State Route 380 at Cooper Creek Road, on approximately 21.1566 acres in the City of Denton, Denton County, Texas. The site is within the drainage area of Segment No. 0823 of the Trinity River Basin (North Latitude 33° 14' 15", West Longitude 97° 04' 53").

Safety-Kleen is a currently permitted commercial, industrial, and hazardous waste management facility that performs solvent recycling and reclamation, fuel blending, and recoverable-fuels marketing. The facility receives wastes from off-site sources on a commercial basis, recycles or reclaims the wastes, and returns the recycled material to its customers as product. The facility stores and processes waste as part of commercial operations. The wastes managed at the facility include industrial and municipal hazardous wastes and Class 1, Class 2, and Class 3 industrial solid waste.

B. Description of the Application

Safety-Kleen submitted an application to TCEQ for a permit renewal and major amendment that would authorize (1) continued operation of the facility, (2) new Container Storage Area No. 5, and (3) additional waste codes.

II. PROCEDURAL HISTORY

On August 9, 1994, TCEQ issued Safety-Kleen's original permit for a term of ten years.

On March 9, 2004, TCEQ received this application for permit renewal and amendment. On August 11, 2004, the Executive Director declared the application administratively complete. On August 25, 2004, the Notice of Receipt of Application and Intent to Obtain an Industrial and Hazardous Waste Permit Amendment and Renewal was published in the *Denton Record-Chronicle*.

After receiving public meeting requests, the Executive Director decided to hold a public meeting. On November 23, 2004, November 30, 2004, and December 7, 2004, the

Notice of Public Meeting was published in the *Denton Record-Chronicle*. On December 13, 2004, the Executive Director held a public meeting in Denton.

On October 4, 2004, the Executive Director issued the first notice of deficiency to Safety-Kleen. On November 5, 2004, the Executive Director received the response to the first notice of deficiency. On November 29, 2004, the Executive Director issued the second notice of deficiency. On December 14, 2004, the Executive Director received the response to the second notice of deficiency. On September 19, 2005, the Executive Director completed the technical review of the application, prepared a final draft permit, and transmitted the final draft permit to the Chief Clerk. On September 23, 2005, the Chief Clerk mailed the notice and final draft permit to Safety-Kleen. The Notice of Application and Preliminary Decision was published twice: first in the *Dallas Morning News* on October 27, 2005, and then in the *Denton Record-Chronicle* on December 19, 2005.¹

The Executive Director received from the public and from local elected officials requests to hold a second public meeting. After TCEQ staff communicated with the office of the Mayor of the City of Denton and with members of CHG, the Executive Director decided to hold a second public meeting. On March 6, 2006, March 13, 2006, and March 20, 2006, the Notice of Public Meeting was published in the *Denton Record-Chronicle*. On March 28, 2006, the Executive Director held a second public meeting in Denton, and the public comment period ended.

On September 27, 2006, the Executive Director filed the Response to Public Comment. On November 2, 2006, the period for requesting a contested case hearing ended.

In December 2006, TCEQ's Alternative Dispute Resolution Program contacted the parties and began facilitating settlement negotiations. On May 22, 2007, the Alternative Dispute Resolution Program held a formal mediation in Denton at the request of Safety-Kleen and the requestors, but the parties did not settle at that time. On November 7, 2007, the Executive Director asked the Alternative Dispute Resolution Program to recommend setting the hearing requests on Agenda, with the understanding that Safety-

¹ The second publication in the *Denton Record-Chronicle* was necessary to satisfy TCEQ rules requiring publication to be in the same newspaper in which the Notice of Receipt of Application and Intent to Obtain Permit had been published. 30 TEX. ADMIN. Code § 39.405(b) (2007).

Kleen and the requestors would continue negotiations. On December 17, 2007, TCEQ's Chief Clerk issued notice that the Commissioners would consider the hearing requests on January 30, 2008. On December 20, 2007, the Alternative Dispute Resolution Program filed a Motion for Continuance on behalf of Safety-Kleen and the requestors, asking TCEQ's General Counsel to continue the Agenda setting to allow Safety-Kleen and the requestors time to finalize negotiations. On December 21, 2007, TCEQ's General Counsel granted the request and continued the Agenda setting to March 19, 2008.²

Because this application was declared administratively complete after September 1, 1999, this action is subject to the procedural requirements adopted under House Bill 801.³

III. EVALUATION PROCESS FOR HEARING REQUESTS

The regulations governing requests for contested case hearings are found at Title 30, Texas Administrative Code, Chapter 55.

A. The Request

A request for contested case hearing must meet the requirements of Section 55.201(c) and (d).

- (1) The request must be in writing.
- (2) The request must be timely filed.
- (3) The request must provide the name, address, daytime telephone number, and fax number, if possible, of the person who files the request.
- (4) If the request is made by a group or association, the request must identify the name, address, daytime telephone number, and fax number, if possible,

² 30 TEX. ADMIN. Code § 39.405(b) (2007) (requiring the Notice of Application and Preliminary Decision to be published in the same newspaper in which the Notice of Receipt of Application and Intent to Obtain Permit had been published).

³ Tex. H.B. 801, 76th Leg., R.S. (1999).

of one person who is responsible for receiving all official communications and documents for the group.

- (5) The request must identify the requestor's personal justiciable interest affected by the application, including a written statement explaining the requestor's location, the requestor's distance from the facility, and how and why the requestor claims to be adversely affected by the facility in a manner not common to members of the general public.
- (6) The request must ask for a contested case hearing.
- (7) The request must list relevant and material disputed issues that were raised during the public comment period.
- (8) The request must provide any other information specified in the public notice of the application.

B. Affected-Person Status

In addition to requesting a contested case hearing, a person must be an affected person.

For any application, an affected person is one who has a personal justiciable interest related to a legal right, duty, privilege, power, or economic interest affected by the application. An interest common to members of the general public does not qualify as a personal justiciable interest.⁴

Factors in determining whether a person is an affected person including the following:

- (1) whether the interest claimed is one protected by the law under which the application will be considered,
- (2) distance restrictions or other limitations imposed by law on the affected interest,

⁴

30 TEX. ADMIN. CODE § 55.203(a) (2006).

- (3) whether a reasonable relationship exists between the interest claimed and the activity regulated,
- (4) the likely impact of the regulated activity on the health and safety of the person and on the use of the property of the person, and
- (5) the likely impact of the regulated activity on use of the impacted natural resource by the person.⁵

A group or association must meet the following requirements to request a contested case hearing:

- (1) One or more members must otherwise have standing to request a hearing in their own right.
- (2) The interests the organization seeks to protect must be germane to the organization's purpose.
- (3) Neither the claim asserted nor the relief requested requires individual members to participate in the case.⁶

In addition, local governments, public agencies, and other governmental entities that have authority under state law over issues raised by the application or that have interests in issues relevant to the application, may be considered affected persons.⁷

C. Response to a Hearing Request

A response to hearing request must specifically address the following:

- (1) whether the requestor is an affected person,
- (2) whether the issues in dispute involve questions of fact or of law,
- (3) whether the issues in the request were raised during the public comment period, and

⁵ 30 TEX. ADMIN. CODE § 55.203(c) (2006).

⁶ 30 TEX. ADMIN. CODE § 55.205(a) (2006).

⁷ 30 TEX. ADMIN. CODE § 55.203(b)-(c) (2006).

- (4) whether the issues in the request are relevant and material to the decision on the application.⁸

IV. ANALYSIS OF THE HEARING REQUESTS

Edward B. Soph, president of CHG, submitted a hearing request on behalf of CHG. Delores Olmon, E. Parks Olmon, Joy Powell, and Dee Wooten are individuals who submitted hearing requests on their own behalf. They are also members of CHG.

A. Affected-Person Status

1. Citizens for Healthy Growth

On October 27, 2006, Edward B. Soph submitted a timely written request for hearing on behalf of CHG. The request included contact information for the person who is responsible for receiving official communications for the group.

To request a hearing, CHG must meet the three requirements for associational standing as described on page 6. First, one or more members must otherwise have standing to request a hearing in their own right. Second, the interests the organization seeks to protect must be germane to the organization's purpose. And third, neither the claim CHG asserts nor the relief it requests requires individual members to participate in the case.

CHG includes in its request information that addresses these three requirements. First, CHG named as members Delores Olmon, E. Parks Olmon, Joy Powell, and Dee Wooten. These members have submitted separate requests for hearing and have demonstrated standing to request a hearing in their own right. Second, CHG stated that it seeks to protect the environmental and public health interests raised during the public meetings. The Executive Director interprets CHG's representation to be the organization's purpose; therefore, the Executive Director determines that the organization's interests are germane to the organization's purpose. And third, CHG's claims and the relief it seeks do not require individual members to participate in this case.

The Executive Director concludes that CHG qualifies as an affected person.

⁸

30 TEX. ADMIN. CODE § 55.209(e) (2006).

CHG seeks a hearing on Issues 1 through 20, which were raised in the response to public comment.

Executive Director recommends referring Issues 1 through 10

Comments included concern that groundwater and surface water are at risk of pollution.

Issue 1: Does the draft permit protect surface water quality?

Issue 2: Does the draft permit protect groundwater quality?

Comments included concern that the buffer areas between the storage tanks, the facility, and the adjacent property are inadequate.

Issue 3: Do the facility buffer zone and tank locations satisfy the regulatory requirements?

Comments included concern that Safety-Kleen maintain an adequate number of expert personnel to handle a major emergency at the facility.

Issue 4: Do the provisions for staffing and staff training in the application satisfy regulatory requirements?

Comments included concern that the application does not contain a contingency plan to address potential catastrophic emergencies.

Issue 5: Does the contingency plan in the application satisfy the regulatory requirements?

Comments included concern that the facility lacks adequate security measures to prevent unauthorized entry and acts of terrorism.

Issue 6: Do the security measures in the application and draft permit satisfy the regulatory requirements?

Comments included concern that Safety-Kleen has not posted a bond large enough to pay for cleanup, environmental remediation, and medical bills for injured citizens, and

compensation for injured citizens in the event of a major accident. Comments included concern that Safety-Kleen may be at risk of bankruptcy and could lose key employees.

Issue 7: Do the provisions for financial assurance and liability insurance in the application and draft permit satisfy the regulatory requirements?

Comments included concern that Safety-Kleen's compliance history is poor and should lead to denial of the application.

Issue 8: Does Safety-Kleen's compliance history warrant denial of the application?

Comments included concern about odor.

Issue 9: Does Safety-Kleen's application contain a sufficient odor control plan to satisfy the regulatory requirements?

Issues 1 through 9 are disputed issues of fact, were raised during the comment period in comments that were not withdrawn, and are relevant and material to the decision on the application. The Executive Director concludes that Issues 1 through 9 are appropriate to refer to the State Office of Administrative Hearings.

Comments included concern about emissions of air pollutants at the facility, the health effects of air pollution related to sources outside the facility, air modeling, and air monitoring.

Issue 10: Does the application and draft permit satisfy regulatory requirements for air emissions under the hazardous waste rules?

To the extent that the comments raise issues related to air emissions under the hazardous waste rules, Issue 10 raises a disputed issues of fact, was raised during the comment period in a comment that was not withdrawn, and is relevant and material to the decision on the application. The Executive Director concludes that this issue, to the extent that is related to air emissions under the hazardous waste rules, is appropriate to refer to the State Office of Administrative Hearings. To the extent that the comments raise issues that are not related to the waste permit application, those issues are not disputed issues of

fact, are not relevant and material to the decision on the application, and should not be referred to the State Office of Administrative Hearings.

Executive Director recommends not referring Issues 11 through 20

Comments included concern that the application should be denied because it does not include a map depicting the population within a three-mile radius of the facility.

Issue 11: Do TCEQ rules require the application to include a map depicting the population within a three-mile radius of the facility?

TCEQ rules do not require Safety-Kleen to prepare a map depicting the population within a three-mile radius of the facility. This issue is not a disputed issue of fact and is not relevant and material to the decision on the application. Therefore, the Executive Director concludes that this issue should not be referred to the State Office of Administrative Hearings.

The Response to Comments included comments that the application should be denied because the facility is located within one-half mile from parks, a daycare center, a school, a church, and residences.

Issue 12: Do TCEQ rules prohibit an existing, permitted commercial industrial hazardous waste management facility from renewing or amending its permit because parks, daycare centers, schools, churches, or residences are located within one-half mile of the facility?

TCEQ rules do not prohibit renewal or amendment of a permit based on the proximity of parks, daycare centers, schools, churches, or residences. This issue is not a disputed issue of fact and is not relevant and material to the decision on the application. The Executive Director concludes that this issue should not be referred to the State Office of Administrative Hearings.

Comments included concern that an environmental impact statement analyzing risks of the facility has not been conducted to determine if the facility poses a danger to nearby residents or to the environment.

Issue 13: Do the rules require an environmental impact statement to determine whether the facility poses a risk to human health and the environment?

TCEQ rules do not require an environmental impact statement. This issue is not a disputed issue of fact and is not relevant and material to the decision on the application. The hazardous waste program is designed to protect human health and the environment. The Executive Director concludes that this issue should not be referred to the State Office of Administrative Hearings.

Comments included concern that the facility handles toxic wastes including wastes containing lead, carcinogens, and toxins.

Issue 14: Do TCEQ rules allow a facility to be authorized to handle waste streams under the industrial hazardous waste regulations?

TCEQ rules regulate the review and permitting of facilities to handle waste, including industrial hazardous waste. This issue is a matter of law, is not a disputed issue of fact, and is not relevant and material to the decision on the application. The Executive Director concludes that the requested issue should not be referred to the State Office of Administrative Hearings.

Comments included concern that the City of Denton and Denton County have not designated hazardous-material routes, because Denton has no worst-case scenario, and because the roads and rails are already overcrowded.

Issue 15: Is the decision to grant or deny a permit application contingent upon the sufficiency of local planning or transportation infrastructure?

TCEQ rules do not require assessment of the sufficiency of city and county planning or the sufficiency of transportation infrastructure when determining whether to issue a permit. This issue is not a disputed issue of fact and is not relevant and material to the decision on the application. The Executive Director concludes that the requested issue should not be referred to the State Office of Administrative Hearings.

Comments included concern that the City of Denton has not created an evacuation plan for the 2.4-mile area surrounding the facility, that traffic on highways in the vicinity of

the facility cannot move quickly at particular times of the day, and that an evacuation route has not been designated.

Issue 16: Is the decision to grant or deny a permit application contingent upon whether there is a sufficient local emergency evacuation plan?

TCEQ rules do not require a public emergency evacuation plan. This issue is not a disputed issue of fact and is not relevant and material to the decision on the application. The Executive Director concludes that this issue should not be referred to the State Office of Administrative Hearings.

Comments included concern that no environmental impact study addressing potential threats to public safety has been performed.

Issue 17: Do the rules require an environmental impact study?

TCEQ rules do not require an environmental impact study as a prerequisite to permit issuance or denial. This issue is not a disputed issue of fact and is not relevant and material to the decision on the application. The Executive Director concludes that the requested issue should not be referred to the State Office of Administrative Hearings because it is not a relevant and material fact issue to affect whether the application would be granted.

Comments included concern that toxic-waste storage will affect property values.

Issue 18: Do the rules require TCEQ to consider property values in determining whether to grant or deny the application?

TCEQ does not have jurisdiction to consider property values when determining whether to grant or deny an application. This issue is not a disputed issue of fact and is not relevant and material to the decision on the application. The Executive Director concludes that the requested issue should not be referred to the State Office of Administrative Hearings because it is not a relevant and material fact issue to affect whether the application would be granted.

Comments included concern that the facility has generated noise complaints.

Issue 19: Do the rules require TCEQ to consider noise in determining whether to grant or deny the application?

TCEQ does not have jurisdiction to consider sound when determining whether to grant or deny an application. This issue is not a disputed issue of fact and is not relevant and material to the decision on the application. The Executive Director concludes that the requested issue should not be referred to the State Office of Administrative Hearings because it is not a relevant and material fact issue to affect whether the application would be granted.

Comments included concern that the application should be denied unless TCEQ conducts an adequate number of unannounced investigations of the facility.

Issue 20: Do the rules regarding TCEQ's regulatory inspection schedule and practices require denial of the application?

This issue is not a disputed issue of fact and is not relevant and material to the decision on the application. The Executive Director concludes that the requested issue should not be referred to the State Office of Administrative Hearings because it is not a relevant and material fact issue to affect whether the application would be granted.

CHG raises issues that are protected by the Texas Solid Waste Disposal Act and TCEQ rules. Because of the proximity of at least one member of CHG to the facility, a reasonable relationship exists between the interests of the requestor and the facility.

The Executive Director concludes that CHG qualifies as an affected person.

2. Delores Olmon and E. Parks Olmon

On October 26, 2006, Delores Olmon and E. Parks Olmon jointly submitted a timely written request for hearing. The request included contact information and provided the requestors' location at approximately one mile from the facility.

Delores Olmon and E. Parks Olmon seek a hearing on Issues 1 through 20.

Delores Olmon and E. Parks Olmon raise disputed issues of fact that are protected by the Texas Solid Waste Disposal Act and TCEQ rules. Because of the proximity of the requestors to the facility, a reasonable relationship exists between the interests of the requestors and the facility.

The Executive Director concludes that the Delores Olmon and E. Parks Olmon qualify as affected persons.

3. Joy Powell

On October 23, 2006, Joy Powell submitted a timely written request for hearing. The request included contact information and provided the requestor's location at less than one quarter of a mile from the facility.

Joy Powell seeks a hearing on Issues 1 through 20.

Joy Powell raises issues that are protected by the Texas Solid Waste Disposal Act and TCEQ rules. Because of the proximity of the requestor to the facility, a reasonable relationship exists between the interests of the requestor and the facility.

The Executive Director concludes that Joy Powell qualifies as an affected person.

4. Dee Wooten

On October 26, 2006, Dee Wooten submitted a timely written request for hearing. The request included contact information and provided the requestor's location at less than one-half mile from the facility.

Dee Wooten also seeks a hearing on hearing on Issues 1 through 20.

Dee Wooten raises issues that are protected by the Texas Solid Waste Disposal Act and TCEQ rules. Because of the proximity of the requestor to the facility, a reasonable relationship exists between the interests of the requestor and the facility.

The Executive Director concludes that Dee Wooten qualifies as an affected person.

B. Issues

Issue 1: Does the draft permit protect surface water quality?

Issue 2: Does the draft permit protect groundwater quality?

Issue 3: Do the facility buffer zone and tank locations satisfy the regulatory requirements?

Issue 4: Do the provisions for staffing and staff training in the application satisfy regulatory requirements?

Issue 5: Does the contingency plan in the application satisfy the regulatory requirements?

Issue 6: Do the security measures in the application and draft permit satisfy the regulatory requirements?

Issue 7: Do the provisions for financial assurance and liability insurance in the application and draft permit satisfy the regulatory requirements?

Issue 8: Does Safety-Kleen's compliance history warrant denial of the application?

Issue 9: Does Safety-Kleen's application contain a sufficient odor control plan to satisfy the regulatory requirements?

Issue 10: Does the application and draft permit satisfy regulatory requirements for air emissions under the hazardous waste rules?

Issue 11: Do TCEQ rules require the application to include a map depicting the population within a three-mile radius of the facility?

Issue 12: Do TCEQ rules prohibit an existing permitted commercial industrial hazardous waste management facility from renewing or amending its permit because parks, daycare centers, schools, churches, or residences are located within one-half mile of the facility?

Issue 13: Do the rules require an environmental impact statement to determine whether the facility poses a risk to human health and the environment?

Issue 14: Do TCEQ rules allow a facility to be authorized to handle waste streams under the industrial hazardous waste regulations?

Issue 15: Is the decision to grant or deny a permit application contingent upon the sufficiency of local planning or transportation infrastructure?

Issue 16: Is the decision to grant or deny a permit application contingent upon whether there is a sufficient local emergency evacuation plan?

Issue 17: Do the rules require an environmental impact study?

Issue 18: Do the rules require TCEQ to consider property values in determining whether to grant or deny the application?

Issue 19: Do the rules require TCEQ to consider noise in determining whether to grant or deny the application?

Issue 20: Do the rules regarding TCEQ's regulatory inspection schedule and practices require denial of the application?

VI. DURATION OF THE CONTESTED CASE HEARING

The Executive Director expects the maximum duration for a contested case hearing on this matter to be nine months.

V. EXECUTIVE DIRECTOR'S RECOMMENDATION

The Executive Director recommends the Commissioners take the following actions:

1. Find that Delores Olmon, E. Parks Olmon, Joy Powell, Dee Wooten, and CHG are affected persons under 30 Tex. Admin. Code § 55.203(b).
2. Refer the following issues to the State Office of Administrative Hearings for a proceeding of nine months:

Issue 1: Does the draft permit protect surface water quality?

Issue 2: Does the draft permit protect groundwater quality?

Issue 3: Do the facility buffer zone and tank locations satisfy the regulatory requirements?

Issue 4: Do the provisions for staffing and staff training in the application satisfy regulatory requirements?

Issue 5: Does the contingency plan in the application satisfy the regulatory requirements?

Issue 6: Do the security measures in the application and draft permit satisfy the regulatory requirements?

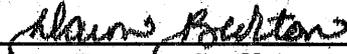
Issue 7: Do the provisions for financial assurance and liability insurance in the application and draft permit satisfy the regulatory requirements?

Issue 8: Does Safety-Kleen's compliance history warrant denial of the application?

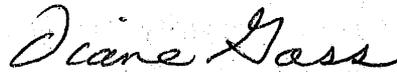
Issue 9: Does Safety-Kleen's application contain a sufficient odor control plan to satisfy the regulatory requirements?

Issue 10: Does the application and draft permit satisfy regulatory requirements for air emissions under the hazardous waste rules?

Respectfully submitted,



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Representing the Executive Director of the
Texas Commission on Environmental
Quality

Certificate of Service

I certify that on February 25, 2008, the original and eleven copies of the Executive Director's Response to Hearing Requests for the application by Safety-Kleen Systems, Inc. for renewal and amendment of IHW Permit No. 50163 was filed with the Office of the Chief Clerk at the Texas Commission on Environmental Quality, and a copy was mailed to all persons on the attached mailing list.


Dawn Burton

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List of Attachments

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Attachment A
Draft Permit



HAZARDOUS WASTE PERMIT NO. 50163
EPA ID. NO. TXD077603371
ISWR NO. 65124

Texas Commission on
Environmental Quality
Austin, Texas

PERMIT FOR INDUSTRIAL SOLID
WASTE MANAGEMENT SITE issued
under provisions of TEXAS HEALTH AND
SAFETY CODE ANN.
Chapter 361 (Vernon)

Name of Permittee: Safety-Kleen Systems, Inc.
1722 Cooper Creek Road
Denton, Texas 76208

Site Owner: Safety-Kleen Systems, Inc.
5400 Legacy Drive
Cluster II, Building 3
Plano, TX 75024

Registered Agent for Service: C.T. Corporation
350 North Saint Paul
Dallas, Texas 76201

Classification of Site: Hazardous and Nonhazardous Class 1, Class 2 and Class 3
Industrial Solid Waste Off-site Storage and Processing,
Commercial Facility

The permittee is authorized to manage wastes in accordance with the limitations, requirements, and other conditions set forth herein. This permit is granted subject to the rules of the Commission and other Orders of the Commission, and laws of the State of Texas. This permit does not exempt the permittee from compliance with the Texas Clean Air Act. This permit will be valid until canceled, amended, modified or revoked by the Commission, except that the authorization to store and process wastes shall expire midnight, 10 years after the date of renewal permit approval. This permit was originally issued on August 9, 1994.

All provisions in this permit stem from State and/or Federal authority. Those provisions marked with an asterisk (*) stem from Federal authority and will implement the applicable requirements of HSWA for which the Texas Commission on Environmental Quality has not been authorized. Those provisions marked with a double asterisk (**). stem from federal authority only.

ISSUED:

For The Commission

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- B - FACILITY MAP
- C - LIST OF INCORPORATED APPLICATION MATERIALS
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I. FACILITY DESCRIPTION

A. Size and Location of Site

A permit is issued to Safety-Kleen Systems, Inc. (hereafter called the permittee), to operate a solvent recycling/reclamation and fuels blending facility located at 1722 Cooper Creek Road, in Denton County, Texas, drainage area of Segment No. 0823 of the Trinity River Basin North Latitude 33°14'15", West Longitude 97°04'53". The legal description of the facility submitted in Permit No. 50163 application dated March 8, 2004, is hereby made a part of this permit as "Attachment A". The hazardous waste management facility as delineated by the permittee's application map is hereby made a part of this permit as "Attachment B".

B. Incorporated Application Materials

This permit is based on, and the permittee shall follow the Part A and Part B Industrial and Hazardous Waste Application submittals dated March 8, 2004, April 18, 2004, August 3, 2004, September 14, 2004, November 4, 2004, December 13, 2004, January 14, 2005, March 14, 2005, July 13, 2005, and August 18, 2005, and the Application Elements listed in "Attachment C", which are hereby approved subject to the terms of this permit and any other orders of the Texas Commission on Environmental Quality (TCEQ).

II. GENERAL FACILITY STANDARDS

A. Standard Permit Conditions

The permittee has a duty to comply with the Standard Permit Conditions under 30 Texas Administrative Code (TAC) Section 305.125. Moreover, the permittee has a duty to comply with the following permit conditions:

1. Modification of Permitted Facilities

The facility units and operational methods authorized are limited to those described herein and by the application submittals identified in Provision I.B. All facility units and operational methods are subject to the terms and conditions of this permit and Texas Commission on Environmental Quality (TCEQ) rules. Prior to constructing or operating any facility units in a manner which differs from either the related plans and specifications contained in the permit application or the limitations, terms or conditions of this permit, the permittee must comply with the TCEQ permit amendment/modification rules as provided in 30 TAC Sections 305.62 and 305.69.

2. Duty to Comply

The permittee must comply with all the conditions of this permit, except that the permittee need not comply with the conditions of this permit to the extent and for the duration such noncompliance is authorized in an emergency order issued by the Commission. Any permit noncompliance, other than noncompliance authorized by

[II.A.2.]

an emergency order, constitutes a violation of Resource Conservation and Recovery Act (RCRA) and is grounds for enforcement action; for permit termination, revocation and reissuance, or modification; or for denial of a permit renewal application. [30 TAC Section 305.142]

3. Severability

The provisions of this permit are severable, and if any provision of this permit or the application of any provision of this permit to any circumstance, is held invalid, the application of such provision to other circumstances, and the remainder of this permit shall not be affected thereby.

4. Definitions

For purposes of this permit, terms used herein shall have the same meaning as those in 30 TAC Chapters 305, 335, and 350 unless this permit specifically provides otherwise; where terms are not defined in the regulations or the permit, the meaning associated with such terms shall be defined by a standard dictionary reference or the generally accepted scientific or industrial meaning of the term.

Application data - data used to complete the final application and any supplemental information.

5. Permit Expiration

In order to continue a permitted activity after the expiration date of the permit the permittee shall submit a new permit application at least 180 days before the expiration date of the effective permit, unless permission for a later date has been granted by the Executive Director. Authorization to continue such activity will terminate upon the effective denial of said application.

6. Certification Requirements

For a new facility, the permittee may not commence storage, processing, or disposal of solid waste; and for a facility being modified, the permittee may not process, store or dispose of solid waste in the modified portion of the facility, except as provided in 30 TAC Section 305.69 (relating to Solid Waste Permit Modification at the Request of the Permittee) until the following has been accomplished [30 TAC Section 305.144]:

[II.A.6.]

- a. The permittee has submitted to the Executive Director and the local Regional Office of the TCEQ, by certified mail or hand delivery, a letter signed by the permittee, and signed and sealed by a Texas licensed Professional Engineer stating that the facility has been constructed or modified in compliance with the permit. If the certification is being provided to document proper closure of a permitted unit, or to certify installation or repair of a tank system, then the certification must be signed and sealed by an independent Texas licensed Professional Engineer. Required certification shall be in the following form:

"This is to certify that the following activity (Specify activity, e.g., construction, installation, closure, etc., of an item) relating to the following item (Specify the item, e.g., the particular facility, facility unit, unit component, subcomponent part, or ancillary component), authorized or required by TCEQ Permit No. 50163, has been completed, and that construction of said facility component has been performed in accordance with and in compliance with good engineering practices and the design and construction specifications of Permit No. 50163."

- b. A certification report has been submitted, with the certification described in Provision II.A.6., which is logically organized and describes in detail the tests, inspections, and measurements performed, their results, and all other bases for the conclusion that the facility unit, unit component, and/or closure have been constructed, installed and/or performed in conformance with the design and construction specifications of this permit and in compliance with this permit. The report shall describe each activity as it relates to each facility unit or component being certified including reference to all applicable permit provisions. The report shall contain the following items, at a minimum:

- (1) Scaled, as-built plan-view and cross-sectional drawings which accurately depict the facility unit and all unit components and subcomponents and which demonstrate compliance with the design and construction specifications approved and detailed in the terms of this permit;
- (2) All necessary references to dimensions, elevations, slopes, construction materials, thickness and equipment; and
- (3) For all drawings and specifications, the date, signature, and seal of a Professional Engineer who is licensed in the State of Texas.

- c. The Executive Director has inspected the modified or newly constructed facility and finds it is in compliance with the conditions of the permit; or

[II.A.6.c.]

if within 15 days of submission of the letter required by paragraph (a) of this section, the permittee has not received notice from the Executive Director of the intent to inspect, prior inspection is waived and the permittee may commence processing, storage, or disposal of solid waste.

* 7. Land Disposal Restrictions

The permittee shall comply with the land disposal restrictions as found in 40 CFR 268 and any subsequent applicable requirements promulgated through the Federal Register. Requirements include modifying/amending the permittee's waste analysis plan to include analyses to determine compliance with applicable treatment standards or prohibition levels, pursuant to 40 CFR 268.7(c) and 264.13(a).

8. Dust Suppression

Pursuant to 40 CFR 266.23(b)/30 TAC Section 335.214(b), the permittee shall not use waste, used oil, or any other material which is contaminated with dioxin, polychlorinated biphenyls (PCBs), or any other hazardous waste (other than a waste identified solely on the basis of ignitability) for dust suppression or road treatment.

9. Permit Reopener (Reserved)

10. Texas Coastal Management Program (Reserved)

11. Monitoring of Commercial Hazardous Waste Management Facility Operations
Within the first year after Commission action on this permit, the permittee shall provide notice to affected persons of the intent to have an independent annual environmental audit of the facility performed. The notice shall be issued in accordance with the requirements of 30 TAC Section 305.147(1). If an affected party requests the audit, then the permittee must follow the requirements of 30 TAC Section 305.147(2)-(6), and (8), for selecting an independent inspector, paying for the notice and audit, submission of a written report, and determining the scope of the inspection.

12. Failure to Submit Relevant Facts in Permit Application

Where the permittee becomes aware that it failed to submit any relevant facts in a permit application or submitted incorrect information in a permit application or any report to the Executive Director, the permittee shall promptly submit the correct information or facts to the Executive Director. [30 TAC Section 305.125(19)]

13. Hazardous Waste Combustion Facility Provision (Reserved)

[II.]

B. Recordkeeping and Reporting Requirements

1. Monitoring and Records

- a. All data submitted to the TCEQ shall be in a manner consistent with the latest version of the "Quality Assurance Project Plan for Environmental Monitoring and Measurement Activities Relating to the Resource Conservation Recovery Act and Underground Injection Control" (TCEQ QAPP).
- b. Monitoring samples and measurements shall be taken at times and in a manner so as to be representative of the monitored activity. The method used to obtain a representative sample of the material to be analyzed shall be the appropriate method from Appendix I of 40 CFR Part 261 or an equivalent method approved in writing prior to use by the Executive Director of the TCEQ. Laboratory methods shall be those specified in *Test Methods for Evaluating Solid Waste: Physical/Chemical Methods*, SW-846, 1987 (EPA SW-846), as revised; *Standard Methods for the Examination of Water and Wastewater, Fifteenth Edition, 1980, and 1981 supplement, or current adopted edition*; *RCRA Ground-Water Monitoring: Draft Technical Guidance, 1992*, OSWER Directive 9950.1, or an equivalent method, as specified in the Waste Analysis Plan, Section 3.0 of the Part B Application, and approved in writing prior to use by the Executive Director. [30 TAC Section 305.125(11)(A)]
- c. The permittee shall retain in an organized fashion and furnish to the Executive Director, upon request, records of all monitoring information, copies of all reports and records required by this permit, and the certification required by 40 CFR 264.73(b)(9), for a period of at least 3 years from the date of the sample, measurement, report, record, certification, or application [30 TAC Section 305.125(11)(B)].
- d. Records of monitoring shall include the following [30 TAC Section 305.125(11)(C)]:
 - (1) The date, time, and place of sample or measurement;
 - (2) The identity of individual who collected the sample or measurement;
 - (3) The dates analyses were performed;
 - (4) The identity of individual and laboratory who performed the analyses;

[II.B.1.d.]

- (5) The analytical techniques or methods used; and
- (6) The results of such analyses or measurements.

2. Operating Record

In addition to the recordkeeping and reporting requirements specified elsewhere in this permit, the permittee shall maintain a written operating record at the facility, in accordance with 40 CFR 264.73. These records will be made available to representatives of the TCEQ upon request.

3. Retention of Application Data

A permittee shall keep records throughout the term of the permit of data used to complete the final application and any supplemental information. All copies of renewals, amendments, revisions and modifications must also be kept at the facility such that the most current documents are available for inspection at all times. All materials, including any related information, submitted to complete the application shall be retained, not just those materials which have been incorporated into the permit. [30 TAC Section 305.47]

4. Reporting of Noncompliance

The permittee shall report to the Executive Director of the TCEQ information regarding any noncompliance which may endanger human health or the environment. [30 TAC Section 305.125(9)]

- a. Report of such information shall be provided orally within 24 hours from the time the permittee becomes aware of the noncompliance.
- b. A written submission of such information shall also be provided within five days of the time the permittee becomes aware of the noncompliance. The written submission shall contain the following:
 - (1) a description of the noncompliance and its cause;
 - (2) the potential danger to human health or safety, or the environment;
 - (3) the period of noncompliance, including exact dates and times;
 - (4) if the noncompliance has not been corrected, the anticipated time it is expected to continue; and
 - (5) steps taken or planned to reduce, eliminate, and prevent the recurrence of the noncompliance, and to mitigate its adverse effects.

[II.B.]

5. Twenty-Four Hour Reporting

The following shall be included as information which must be reported orally within 24 hours pursuant to Title 30 TAC Section 305.125(9) [30 TAC Section 305.145]:

- a. Information concerning release of any solid waste that may cause an endangerment to public drinking water supplies;
- b. Any information of a release or discharge of solid waste, or of a fire or explosion which could threaten the environment or human health or safety, outside the facility. The description of the occurrence and its cause shall include:
 - (1) name, address, and telephone number of the owner or operator;
 - (2) name, address, and telephone number of the facility;
 - (3) date, time, and type of incident;
 - (4) name and quantity of material(s) involved;
 - (5) the extent of injuries, if any;
 - (6) an assessment of actual or potential hazards to the environment and human health or safety outside the facility, where this is applicable; and
 - (7) estimated quantity and disposition of recovered material that resulted from the incident.

6. Notice Waiver

The Executive Director may waive the five-day written notice requirement specified in Provision II.B.4.b. in favor of a written report submitted to the Commission within 15 days of the time the permittee becomes aware of the noncompliance or condition. [30 TAC Section 305.145(b)]

7. Biennial Report

The permittee shall prepare and submit to the Executive Director all information and records required by 40 CFR 264.75. By March 1st of each even-numbered year for the preceding odd-numbered year's activities the permittee shall submit either a Biennial Report or letter certifying submission of the above. One copy of the report/letter shall be submitted to the TCEQ Industrial and Hazardous Waste Permits Section and an additional copy shall be submitted to the appropriate TCEQ Regional Office.

[II.B.]

8. Pollution Prevention

Facilities subject to 30 TAC Chapter 335, Subchapter Q - Pollution Prevention: Source Reduction and Waste Minimization, must prepare a five year Source Reduction and Waste Minimization Plan and submit a Source Reduction and Waste Minimization Annual Report (SR/WM Annual Report) to the TCEQ Small Business and Environmental Assistance Division. This report must be submitted annually on the dates specified in the rule.

9. Waste Minimization

The permittee shall annually certify, by January 25th for the previous calendar year, the following information, [40 CFR 264.73(b)(9)]:

- a. that the permittee has a program in place to reduce the volume and toxicity of all hazardous wastes which are generated by the permittee's facility operation to the degree determined to be economically practicable; and
- b. that the proposed method of treatment, storage, or disposal is that practicable method currently available to the permittee which minimizes the present and future threat to human health and the environment. This waste minimization certification is to be included in the facility operating records until closure.

10. Annual Detection Monitoring Report (Reserved)

11. Manifest Discrepancy Report

If a significant discrepancy in a manifest is discovered, the permittee must attempt to reconcile the discrepancy. If not resolved within fifteen days, the permittee must submit a report, describing the incident, to the Executive Director, as per the requirements of 30 TAC Section 335.12(c)(2). A copy of the manifest must be included in the report.

12. Unmanifested Waste Report

A report must be submitted to the Executive Director within 15 days of receipt of unmanifested waste, as per the requirements of 30 TAC Section 335.15(3).

13. Monthly Summary

The permittee shall prepare a monthly report, of all manifests received during the month, summarizing the quantity, character, transporter identity, and the method of storage, processing and disposal of each hazardous waste or Class 1 waste shipment

[II.B.13.]

received, itemized by manifest document number. This monthly summary report shall be submitted to the TCEQ Registration, Review, and Reporting Division on or before the 25th day of each month for waste received during the previous month.[30 TAC Section 335.15(2)]

C. Incorporated Regulatory Requirements

1. State Regulations

The following TCEQ regulations are hereby made provisions and conditions of this permit:

- a. 30 TAC Chapter 37, Subchapter P, Financial Assurance for Hazardous and Nonhazardous Industrial Solid Waste Facilities;
- b. 30 TAC Chapter 305, Subchapter A: General Provisions;
- c. 30 TAC Chapter 305, Subchapter C: Application for Permit;
- d. 30 TAC Sections 305.61 - 305.69 (regarding amendments, renewals, transfers, corrections, revocation and suspension of permits);
- e. 30 TAC Sections 305.121 - 305.125 (regarding permit characteristics and conditions);
- f. 30 TAC Sections 305.127 - 305.129 (regarding permit conditions, signatories and variance procedures);
- g. 30 TAC Chapter 305, Subchapter G: Additional Conditions for Hazardous and Industrial Solid Waste Storage, Processing and Disposal Permits;
- h. 30 TAC Chapter 335, Subchapter A, Industrial Solid Waste and Municipal Hazardous Waste In General;
- i. 30 TAC Chapter 335, Subchapter B, Hazardous Waste Management General Provisions;
- j. 30 TAC Section 335.152, Standards;
- k. 30 TAC Sections 335.153 - 335.155 (regarding reporting of emergency situations and additional reports required);
- l. 30 TAC Section 335.167, Corrective Action for Solid Waste Management Units;

[II.C.1.]

- m. 30 TAC Sections 335.175 - 335.176 (regarding special requirements for containers and bulk and containerized waste);
- n. 30 TAC Sections 335.177 - 335.179 (regarding general performance standard, cost estimate for closure, and financial assurance);
- o. 30 TAC Chapter 335, Subchapter Q, Pollution Prevention: Source Reduction and Waste Minimization; and
- p. 30 TAC Chapter 350, Texas Risk Reduction Program.

Issuance of this permit with incorporated rules in no way exempts the permittee from compliance with any other applicable state statute and/or Commission Rule.

2. Federal Regulations

To the extent applicable to the activities authorized by this permit, the following provisions of 40 CFR Part 264, 266 Subpart H, and Part 268, adopted by reference by 30 TAC Section 335.152, and 335 Subchapter O are hereby made provisions and conditions of this permit, to the extent consistent with the Texas Solid Waste Disposal Act, Texas Health and Safety Code Ann., Chapter 361 (Vernon), and the rules of the TCEQ:

- a. Subpart B -- General Facility Standards;
- b. Subpart C -- Preparedness and Prevention;
- c. Subpart D -- Contingency Plan and Emergency Procedures;
- d. Subpart E -- Manifest System, Recordkeeping, and Reporting;
- e. Subpart G -- Closure and Post-closure;
- f. Subpart H -- Financial Requirements;
- g. Subpart I -- Use and Management of Containers;
- h. Subpart J -- Tank Systems;
- i. Subpart X -- Miscellaneous Units;
- j. Subpart AA -- Air Emission Standards for Process Vents;
- k. Subpart BB -- Air Emission Standards for Equipment Leaks;
- l. Subpart CC -- Air Emission Standards for Tanks, Surface Impoundments, and Containers; and

[II.C.2.]

m. 40 CFR Part 268 Land Disposal Restrictions.

III. FACILITY MANAGEMENT

A. Operation of Facility

The permittee shall construct, maintain, and operate the facility to minimize the possibility of a fire, explosion, or any unplanned, sudden or non-sudden release of hazardous waste constituents to air, soil, or surface water which could threaten human health or the environment, as required by 40 CFR 264.31. All equipment and structures used to manage hazardous waste at the facility shall be maintained in proper operating condition.

B. Personnel Training

The permittee shall ensure that all facility personnel involved with hazardous waste management successfully complete a training program as required by 40 CFR 264.16. The permittee shall maintain training documents and records, as required by 40 CFR 264.16(d) and (e).

C. Security

1. The permittee shall provide a 24-hour surveillance system which continuously monitors and controls entry onto the active portion of the facility.
2. The permittee shall post warning signs at all points of access to the active waste management portion(s) of the facility and along the natural and/or artificial barriers in sufficient numbers to be seen from any approach to that (those) portion(s) of the facility. The signs shall be printed so that they may be clearly read from a distance of at least 25 feet, and shall state "Danger - Unauthorized Personnel Keep Out".

D. General Inspection Requirements

The permittee shall follow the inspection schedule contained in the permit application submittals identified in Provision I.B. and as set out in Table III.D.-Inspection Schedule. The permittee shall remedy any deterioration or malfunction discovered by an inspection, as required by 40 CFR 264.15(c). Records of inspection shall be kept, as required by 40 CFR 264.15(d). Any remedial actions taken in response to facility inspections and the date of the remediation shall be included in the inspection records.

E. Contingency Plan

1. The permittee shall follow the Contingency Plan, developed in accordance with 40 CFR Part 264 Subpart D, and contained in the permit application submittals identified in Provision I.B. Copies of this plan shall be available to all employees involved in waste management at the facility.

[III.E.]

2. The permittee shall immediately initiate clean-up procedures for removal of any spilled hazardous or industrial nonhazardous wastes and waste residues and shall take all steps necessary to prevent surface-water or groundwater contamination as a result of any spills.
3. Collected hazardous or industrial nonhazardous wastes, spills, leaks, clean-up residues, and contaminated rainfall runoff, including contaminated stormwater from the drainage control system(s) associated with the permitted units, shall be removed promptly after the spillage and/or rainfall event in as timely a manner as is necessary to prevent overflow of the system by the following method(s):
 - a. Removal to an on-site authorized facility unit;
 - b. Removal to an authorized industrial solid waste management facility or authorized off-site facility; or
 - c. Discharge in accordance with a wastewater/stormwater discharge permit.
4. The permittee shall ensure that any equipment or vehicles which have come in contact with waste in the loading/unloading, storage, processing, and/or disposal areas have been decontaminated prior to their movement into designated uncontaminated areas of the site property. At a minimum, all contaminated equipment shall be externally decontaminated and contaminated vehicles shall have their undercarriages and tires or tracks decontaminated to remove all waste residues and to prevent contamination of uncontaminated areas. All wash water generated shall be collected and disposed of in accordance with Provision III.E.3.
5. Preparedness and Prevention
 - a. At a minimum, the permittee shall equip the facility as set forth in Table III.E.3.- Emergency Equipment, as required by 40 CFR 264.32.
 - b. All sumps, pumps, fire- and spill-control equipment, decontamination equipment, and all other equipment and structures authorized or required through the Contingency Plan shall be tested and maintained, as necessary, to assure its proper operation in time of emergency, as required by 40 CFR 264.33.
 - c. The permittee shall maintain access to the communications or alarm system, as required by 40 CFR 264.34.
 - d. A trained emergency coordinator shall be available at all times in case of an emergency and will have the responsibility for coordinating all emergency response measures as required by 40 CFR 264.55 and 264.56. Emergency number(s) shall be posted in all waste management portions of the facility and all employees in those areas shall be trained in the location of those postings.

[III.]

F. Special Permit Conditions (Reserved)

IV. WASTES AND WASTE ANALYSIS

A. Waste Analysis Plan

The permittee shall follow the Waste Analysis Plan, developed in accordance with 40 CFR 264.13 and the permit application identified in Provision I.B.

B. Authorized Wastes

1. The permittee is authorized to manage hazardous and non-hazardous solid wastes listed in Table IV.B. - Wastes Managed in Permitted Units, subject to the limitations provided herein.

Wastes authorized for storage and processing include those generated from off-site sources.

2. Hazardous and Non-hazardous Waste Received From Off-Site Sources

When the permittee may receive hazardous or non-hazardous waste from an off-site source (except where the permittee is also the generator), the permittee shall inform the generator in writing that the permittee has the appropriate permits and will accept the waste the generator is shipping. The permittee shall keep a copy of this written notice as part of the operating record. [40 CFR 264.12(b)]

3. The wastes authorized in Table IV.B. shall not contain any of the following:

- a. Polychlorinated biphenyls (PCBs), as defined by the EPA in regulations issued pursuant to the Toxic Substances Control Act under Title 40 Code of Federal Regulations (CFR) Part 761, unless the permittee is compliant with the federal requirements for PCB storage as specified in 40 CFR Part 761;
- b. Radioactive wastes unless the permittee is authorized to store, process and dispose of these wastes in compliance with specific licensing and permitting requirements under Chapter 401 of the Texas Health and Safety Code and the rules of the Texas Commission on Environmental Quality or the Department of State Health Services, and/or any other rules of state or federal authorities;
- c. Explosive material, as defined by the Department of Transportation under 49 CFR Part 173;

[IV.B.3.]

- d. Dioxin-containing wastes, identified by EPA as F020, F021, F022, F023, F026, and F027 wastes in 40 CFR 261.31;
 - e. Ignitable compressed gases with the exception of small aerosol spray cans containing spent solvents and paint wastes;
 - f. Municipal garbage; or
 - g. Special Waste from Health-Care Related Facilities subject to 25 TAC Chapter 1 or 30 TAC Chapter 330.
4. Prior to accepting any additional wastes not authorized in Table IV.B., the permittee shall follow the permit amendment or modification requirements listed in 30 TAC Section 305.62 and 305.69.
 5. The permittee may store wastes restricted under 40 CFR Part 268 solely for the purpose of accumulating quantities necessary to facilitate proper recovery, treatment, or disposal provided that it meets the requirements of 40 CFR 268.50(a)(2) including, but not limited to the following:
 - a. Clearly marking each container to identify its contents and the date each period of accumulation begins;
 - b. Clearly marking each tank with a description of its contents, the quantity of each hazardous waste received, and the date each period of accumulation begins, or such information for each tank is recorded and maintained in the operating record at that facility.

C. Sampling and Analytical Methods

1. Table IV.C. - Sampling and Analytical Methods shall be used in conjunction with the Waste Analysis Plan referenced in Provision IV.A. in performing all waste analyses.
2. The permittee shall ensure that all waste analyses utilized for waste identification or verification have been performed in accordance with methods specified in the current editions of EPA SW-846, ASTM or other methods accepted by the TCEQ. The permittee shall have a QA/QC program that is consistent with EPA SW-846 and the TCEQ QAPP.

V. AUTHORIZED UNITS AND OPERATIONS

A. Authorized Units

1. The permittee is authorized to operate the facility units listed in "Attachment D" for storage and processing subject to the limitations herein. All waste management activities not otherwise exempted from permitting under 30 TAC §335.2 shall be

[V.A.1.]

confined to the authorized facility units listed in "Attachment D". References hereinafter in this permit to "TCEQ Permit Unit No. ___" shall be to the facility units listed in "Attachment D". All authorized units must be clearly identified as numbered in "Attachment D". These units must have signs indicating "TCEQ PERMIT UNIT NO. ___".

2. The permittee shall comply with 40 CFR 264.17, relating to general requirements for ignitable, reactive, or incompatible wastes.
3. The permittee shall prevent inundation of any permitted units and prevent any discharges of any waste or runoff of waste contaminated stormwater from permitted units. Additionally, each loading or unloading area, associated with a permitted hazardous or nonhazardous waste management unit, shall be provided with a drainage control system which will collect spills and precipitation in such a manner as to satisfy the following:
 - a. Preclude the release from the system of any collected spills, leaks or precipitation;
 - b. Minimize the amount of rainfall that is collected by the system; and
 - c. Prevent run-on into the system from other portions of the facility.

B. Container Storage Areas

1. Container storage areas are shown in Table V.B. - Container Storage Areas. The permittee is authorized to operate the facility container storage areas for storage and processing subject to the limitations contained herein.
2. Containers holding hazardous waste shall be managed in accordance with 40 CFR 264.171, Condition of containers; 40 CFR 264.172, Compatibility of waste with containers; and 40 CFR 264.173, Management of containers.
3. The permittee shall construct and maintain the containment systems for the container storage areas in accordance with the drawings and details included in the Part B Application in Provision I.B. At a minimum, the containment system must meet the requirements of 40 CFR 264.175.

C. Tanks and Tank Systems

1. The permitted tank units and their approved waste types are shown in Table V.C. - Tanks and Tank Systems. The permittee is authorized to operate the permitted tank units for storage and processing subject to the limitations contained herein.
2. The permittee shall not place hazardous waste or treatment reagents in the tank system if they could cause the tank, its ancillary equipment, or a containment system to rupture, leak, corrode, or otherwise fail. [40 CFR 264.194(a)]

[V.C.]

3. The permittee shall prevent spills and overflows from the tank or containment system as per the requirements of 40 CFR 264.194(b).
4. Secondary containment systems must be provided with a leak-detection system that is operated so that it will detect the failure of either the primary or secondary containment structure or the presence of any release of hazardous waste or accumulated liquid in the secondary containment system within 24 hours.
5. The permittee shall report to the Executive Director within 24 hours of detection when a leak or spill occurs from the tank system or secondary containment system to the environment. [40 CFR 264.196(d)(1)] A leak or spill of one pound or less of hazardous waste that is immediately contained and cleaned-up need not be reported. [40 CFR 264.196(d)(2)] Releases that are contained within a secondary system need not be reported.
6. Within 30 days of detecting a release to the environment from the tank system or secondary containment system, the permittee shall report the following information to the Executive Director: [40 CFR 264.196(d)(3)]
 - a. Likely route of migration of the release;
 - b. Characteristics of the surrounding soil (including soil composition, geology, hydrology, and climate);
 - c. Results of any monitoring or sampling conducted in connection with the release. If the permittee finds it will be impossible to meet this time period, the permittee shall provide the Executive Director with a schedule of when the results will be available. This schedule must be provided before the required 30-day submittal period expires;
 - d. Proximity of downgradient drinking water, surface water, and populated areas; and
 - e. Description of response actions taken or planned.
7. The permittee shall submit to the Executive Director all certifications of major repairs to correct leaks within seven days of returning the tank system to use. [40 CFR 264.196(f)].

D. Surface Impoundments (Reserved)

E. Waste Piles (Reserved)

F. Land Treatment Units (Reserved)

[V.]

- G. Landfills (Reserved)
- H. Incinerators (Reserved)
- I. Boilers/Industrial Furnaces (Reserved)
- J. Drip Pads (Reserved)
- K. Miscellaneous Units

Miscellaneous units and their approved waste types are shown in Table V.K - Miscellaneous Units. The permittee is authorized to operate the miscellaneous units for storage and processing subject to the limitations contained in this permit.

- L. Containment Buildings (Reserved)

VI. GROUNDWATER DETECTION MONITORING (Reserved)

VII. CLOSURE AND POST-CLOSURE REQUIREMENTS

A. Facility Closure

1. The permittee shall follow the closure plan, developed in accordance with 40 CFR Part 264 Subpart G, and contained in the permit application submittals identified in Provision I.B., except as modified in Provisions VII.B., of this permit.

Additionally, facility closure shall also commence:

- a. Upon direction of the TCEQ for violation of the permit, TCEQ Rules, or State Statutes; or
 - b. Upon suspension, cancellation, or revocation of the terms and conditions of this permit concerning the authorization to receive, store, process, or dispose of waste materials; or
 - c. Upon abandonment of the site; or
 - d. Upon direction of the TCEQ for failure to secure and maintain an adequate bond or other financial assurance as required by Provision VII.B.1.
2. Request for Permit Modification or Amendment

The permittee shall submit a written request for a permit modification or amendment to authorize a change in the approved Closure Plan(s), in accordance with 40 CFR 264.112 (c). The written request shall include a copy of the amended Closure Plan(s) for approval by the Executive Director.

[VII.A.]

3. Time Frames for Modification\Amendment Request Submittal

The permittee shall submit a written request for a permit modification or amendment in accordance with the time frames in 40 CFR 264.112 (c)(3).

4. Closure Notice and Certification Requirements

a. The permittee shall notify the Executive Director, in writing, at least 60 days prior to the date on which he expects to begin partial or final closure of a surface impoundment, or landfill unit, or final closure of a facility with such a unit; or at least 45 days prior to the date on which he expects to begin partial or final closure of a facility with processing or storage tanks, container storage, or incinerator units; or at least 45 days prior to the date on which he expects to begin partial or final closure of a boiler or industrial furnace, whichever is earlier. A copy of the notice shall be submitted to the TCEQ Regional Office.

b. The permittee shall notify the TCEQ Regional Office at least ten (10) days prior to any closure sampling activity required by the permit in order to afford regional personnel the opportunity to observe these events and collect samples.

5. Unless the Executive Director approves an extension to the closure period, as per the requirements of 40 CFR 264.113(b), the permittee must complete partial and final closure activities within 180 days after receiving the final known volume of hazardous wastes at the hazardous waste management unit or facility.

6. As per the requirements of 40 CFR 264.115, within 60 days of completion of closure of each permitted hazardous waste surface impoundment, or landfill unit, and within 60 days of the completion of final closure, the permittee shall submit to the Executive Director, by registered mail, with a copy to the TCEQ Regional Office, a certification that the hazardous waste management unit or facility, as applicable, has been closed in accordance with the specifications in the approved Closure Plan and this permit. The certification, which shall be signed by the permittee and by an independent professional engineer licensed in Texas, must be in the form described in Provision II.A.6. A closure certification report shall be submitted with the required certifications which includes a summary of the activities conducted during closure and the results of all analyses performed. The certification report shall contain the information required by Provision II.A.6, and 30 TAC 350.32 (Texas Risk Reduction Program (TRRP) Remedy Standard A) and 30 TAC Section 350.95 (Response Action Completion Report (RACR)). Documentation supporting the independent licensed professional engineer's certification shall be furnished to the Executive Director upon request until the Executive Director releases the permittee from the financial assurance requirements for closure under 40 CFR 264.143(i).

[VII.A.]

7. For each disposal unit closed after permit issuance, the permittee shall submit documentation to demonstrate compliance with 40 CFR 264.116 (relating to survey plat) and 264.119 (relating to post-closure notices). Documentation to demonstrate compliance with survey plat requirements must be submitted to the TCEQ at the time of submission of the certification of closure. Documentation to show compliance with post-closure notices must be submitted to the TCEQ no later than 60 days after certification of closure.
8. Final closure is considered complete when all hazardous waste management units at the facility have been closed in accordance with all applicable closure requirements so that hazardous waste management activities under 40 CFR Part 264 and 265 are no longer conducted at the facility unless subject to the provisions in 40 CFR 262.34.
9. All units, sumps, pumps, piping and any other equipment or ancillary components which have come in contact with hazardous wastes shall either be decontaminated by removing all waste, waste residues, and sludges or be disposed of at an authorized off-site facility.
10. All contaminated equipment/structures and liners (i.e., debris) intended for land disposal shall be treated in a manner which meets or exceeds the treatment standards for hazardous debris contained in 40 CFR 268.45 or removed and managed at an authorized industrial solid waste management facility. All contaminated dikes and soils intended for land disposal shall be treated in a manner which meets or exceeds the treatment standards for hazardous soils contained in 40 CFR 268.49 or removed and managed at an authorized industrial solid waste management facility.
11. All hard-surfaced areas within the hazardous waste management unit areas shall be decontaminated and the wash water generated treated and/or disposed at an authorized off-site facility.
12. Verification of decontamination shall be performed by analyzing wash water, and as necessary, soil samples for the hazardous constituents which have been in contact with the particular item being decontaminated. In addition, the permittee shall perform visual inspections of the equipment/structures for visible evidence of contamination.
13. Unless it can be demonstrated that soil contamination has not occurred, soils shall be sampled and analyzed. Sufficiently detailed analyses of samples representative of soils remaining in non-hard-surfaced areas of the storage and processing facility area shall be performed to verify removal or decontamination of all waste and waste residues.

[VII.A.]

14. Soil and/or wash-water samples shall be analyzed using laboratory methods specified in the *Test Methods for Evaluating Solid Waste: Physical/Chemical Methods*, SW-846, 1987, as revised; *Standard Methods for the Examination of Water and Wastewater, Fifteenth Edition, 1980, and 1981 supplement, or current adopted edition*; *RCRA Ground-Water Monitoring: Draft Technical Guidance, 1992*, OSWER Directive 9950.1. Equivalent or modified methods, must be specified in the Closure Plan and have written approval of the Executive Director prior to use. All data submitted to the TCEQ shall be in a manner consistent with the latest version of the TCEQ QAPP.
15. Decontamination shall be deemed complete when no visible evidence of contamination is observed and when the results from verification sampling and analyses indicate wash water concentrations and/or soil concentrations are below the applicable critical Protective Concentration Level (PCL) for Remedy Standard A. If the underlying soils are decontaminated or removed to the PCL for Remedy Standard A, Commercial/Industrial Land use, the permittee shall comply with the institutional controls requirements of 30 TAC Section 350.111 as required.

B. Financial Assurance for Closure

1. The permittee shall provide financial assurance for closure of all existing permitted units covered by this permit in an amount not less than \$1,648,328 (2004 dollars) as shown in Table VII.E.1.-Permitted Unit Closure Cost Summary. Financial assurance shall be secured and maintained in compliance with 30 TAC Chapter 37, Subchapter P; and Section 335.179. Financial assurance is subject to the following:
 - a. Adjustments to Financial Assurance Amount:
 - (1) At least 60 days prior to acceptance of waste in proposed permitted units listed in Table VII.E.1. - Permitted Unit Closure Cost Summary, the permittee shall increase the amount of financial assurance required for closure by the amounts listed in Table VII.E.1. and shall submit additional financial assurance documentation.
 - (2) The amount of financial assurance for closure of permitted units, may be reduced by the amount listed in Table VII.E.1.-Permitted Unit Closure Cost Summary, upon certification of closure of the permitted unit, in accordance with Provision VII.A.4., and upon written approval of the Executive Director.

[VII.B.1.]

b. Annual Inflation Adjustments

Financial assurance for closure, including any adjustments after permit issuance, shall be corrected for inflation according to the methods described by 30 TAC Sections 37.131 and 37.141.

2. The permittee shall submit to the Executive Director, upon request, such information as may be required to determine the adequacy of the financial assurance.

C. Storage, Processing Unit Closure Requirements

The permittee shall close the storage and processing units identified as TCEQ Permit Unit Nos. 1-139 in accordance with the approved Closure Plans, 40 CFR Part 264, Subpart G, 40 CFR 264.178 (container storage), 264.197 (tanks), and the Texas Risk Reduction Program of 30 TAC Chapter 350 and the following requirements.

If all contaminated soils cannot be removed or decontaminated to TRRP Remedy Standard A, the permittee shall close the tank system and perform post-closure care in accordance with the closure and post-closure requirements for landfills, 30 TAC §335.152(a)(5) and 30 TAC Chapter 350, Subchapter B. A Contingent Closure and Post-Closure Plan must be submitted no later than 60 days (Closure Plan) or 90 days (Post-Closure Care Plan) from the date that the permittee or the Executive Director determines that the hazardous waste management unit must be closed as a landfill, subject to the requirements of 30 TAC 335.174, or no later than 30 days (Closure Plan) from that date if the determination is made during partial or final closure. Within 60 days of determining that the tank system must be closed as a landfill, the permittee shall submit a permit modification for closure and post-closure as a landfill.

D. Surface Impoundments Closure Requirements (Reserved)

E. Landfill Closure and Certification Requirements (Reserved)

F. Containment Buildings Closure Requirements (Reserved)

G. Facility Post-Closure Care Requirements (Reserved)

H. Financial Assurance for Post-Closure (Reserved)

VIII. LIABILITY REQUIREMENTS

A. Sudden and Nonsudden Accidental Occurrences

The permittee shall demonstrate continuous compliance with the requirements of 30 TAC Chapter 37, Subchapter P and 30 TAC § 335.152(a)(6) to maintain liability coverage for sudden and accidental occurrences of at least \$1 million per occurrence, with an annual aggregate of at least \$2 million, exclusive of legal defense costs.

B. Incapacity of Owners or Operators, Guarantors, or Financial Institutions

The permittee shall comply with 30 TAC §37.71, regarding bankruptcy, whenever necessary.

IX. CORRECTIVE ACTION FOR SOLID WASTE MANAGEMENT UNITS

A. Notification of Release From Solid Waste Management Unit
(Texas Health and Safety Code, Section 361.303)

If a solid waste management unit (SWMU) or area of contamination (AOC) not previously addressed in the RCRA Facility Assessment (RFA) dated July 2, 1986, or any release of hazardous waste or hazardous constituents that may have occurred from any SWMU and/or AOC, is discovered subsequent to issuance of this permit, the permittee shall notify the Executive Director in writing within fifteen (15) days of the discovery. Within forty-five (45) days of such discovery, the permittee shall submit an RFA for that unit or release which shall be based on U.S. EPA RCRA Facility Assessment Guidance, October 1986, NTIS PB 87-107769. If the RFA indicates a release or suspected release warrants further investigation, the permittee shall comply with the requirements of Provision IX.B. of this permit.

B. Corrective Action Obligations

The permittee shall conduct corrective action as necessary to protect human health and the environment for all releases of hazardous waste and hazardous constituents from any SWMU. The permittee shall fulfill this obligation by conducting a Corrective Action Program which consists of a RCRA Facility Investigation (RFI) of the unit/area identified. The permittee shall conduct a RFI to determine whether hazardous waste or hazardous constituents listed in 40 CFR Part 261, Appendix VIII and/or 40 CFR Part 264, Appendix IX have been released to into the environment. Upon completion of the RFI the Permittee shall submit to the TCEQ either a demonstration that no release occurred or an Affected Property Assessment Report (APAR) showing the vertical and lateral nature and extent of the release. If it is determined that hazardous waste or hazardous constituents have been or are being released into the environment, then the permittee may be required to implement those activities listed in the Response Action Plan (RAP) to protect human health and the environment. Upon completion of the RAP implementation the permittee must submit to

[IX.B.]

the TCEQ, a Response Action Effectiveness Report (RAER) which details the activity that will be taken to remove, decontaminate and/or control chemicals of concern (COC) which may be present at the facility in excess of critical Protective Concentration Levels (PCLs) in the environmental media. The report shall include actions taken in response to releases to environmental media from waste a management unit(s) before, during, or after closure.

Upon Executive Director's review of the Corrective Action Program obligations, the permittee may be required to perform any or all of the following:

1. conduct investigation(s);
2. provide additional information;
3. conduct additional investigation(s);
4. investigate an additional unit(s);
5. proceed to the next task in the Corrective Action Program and/or;
6. submit an application for a new compliance plan or modification to an existing compliance plan to implement corrective measures.

Any additional requirements must be completed within the time frame(s) specified by the Executive Director.

C. Units Requiring Investigation

The permittee shall conduct an RFI for the following SWMU(s) and/or area(s) of contamination in accordance with Provision IX.E.:

1. SWMU No. 1: Five (5) underground storage tanks; four (4) for storage of mineral spirits and one (1) for storage of diesel fuel, all removed.
2. SWMU No. 2: 85ft. X 125 ft. X 8 ft. storm water retention pond, removed from service, previously received storm water runoff.

D. Variance from Investigation

The permittee may elect to certify that no hazardous waste or hazardous constituents listed in 40 CFR Part 261, Appendix VIII and/or 40 CFR Part 264, Appendix IX are or were present/managed in a unit listed in Provision XI.C. in lieu of performing the investigation required in Provisions IX.B. and E., provided that confirming data is submitted for the current and past waste(s) managed in the respective unit. The permittee shall submit such information and certification(s) on a unit-by-unit basis in the time frame required in Provision IX.E. for review and approval by the Executive Director of the TCEQ. If the permittee cannot demonstrate and certify that hazardous waste or hazardous constituents are not or were not present in a particular unit, the investigation required in Provisions IX.B. and E. shall be performed for the unit.

[IX.]

E. RCRA Facility Investigation (RFI)

Within sixty (60) days from the date of issuance of this permit the permittee shall submit a schedule for completion of the RFI(s) for the SWMU(s) or area(s) of contamination listed in Provision IX.C. to the Executive Director for approval. Also, within sixty (60) days of approval of a RFA Report which recommends further investigation of a SWMU(s) or area(s) of contamination in accordance with Provision IX.A., the permittee shall submit a schedule for completion of the RFI(s) to the Executive Director for approval. The permittee shall initiate the investigations in accordance with the approved schedule and shall address all of the items for RFI Workplans and RFI Reports contained in U.S. EPA publication EPA/520-R-94-004, OSWER Directive 9902.3-2A, RCRA Corrective Action Plan (Final), May 1994. If the permittee elects to use an alternate investigation approach, Executive Director approval of the workplan will be required prior to initiation of investigation(s). The results of the RFI must be submitted to the Executive Director for approval in the form of an APAR. The APAR must document results of the investigation(s). The report shall be considered complete when the full nature and extent of the contamination, Quality Assurance/Quality Control procedures and Data Quality Objectives are documented to the satisfaction of the Executive Director.

F. Response Action Plan (RAP)

Upon approval of the activities outlined in the APAR, if it is determined that there has been a release into the environment of hazardous waste or hazardous constituents listed in 40 CFR Part 261, Appendix VIII and/or 40 CFR Part 264 Appendix IX, which appears to be a risk to human health and the environment, then within the time frame(s) specified by the Executive Director following approval of the APAR, the permittee shall submit a RAP. This plan shall evaluate the risk, identify and evaluate corrective measure alternatives and recommend appropriate corrective measure(s) to protect human health and the environment. The RAP shall address all of the applicable items in 30 TAC 350 Subchapter B and Subchapter E and the U.S. EPA publication EPA/520-R-94-004, OSWER Directive 9902.3-2A, RCRA Corrective Action Plan (Final), May 1994.

a. Response Action Completion Report (RACR)

The permittee shall submit a RAP within the time frame required by the Executive Director, not to exceed one-hundred-eighty (180) days from the date of approval of the APAR. The RAP shall address all of the items for Corrective Measures Implementation (CMI) Workplans contained in the U.S. EPA publication EPA/520-R-94-004, OSWER Directive 9902.3-2A, RCRA Corrective Action Plan (Final), May 1994. If the RAP does not propose a permanent remedy, then a RAP shall be submitted as part of a new compliance plan application or as a modification/amendment application to an existing compliance plan. The RAP shall contain detailed final engineering design and monitoring plans and schedules

[IX.F.a.]

necessary to implement the selected remedy. Implementation of the corrective measures shall be addressed through a new and/or a modified/amended compliance plan. Upon installation of a corrective action system based upon the approved RAP, the permittee shall submit a RACR. Approval of the RACR places the SWMU in a status of conditional No Further Action, reflecting that the remedy is in place, controls must be maintained, and effectiveness must be monitored. To report the progress of the corrective measures, the permittee shall submit the Post-Response Action Care Report (PRACR) to the TCEQ in accordance with the schedule specified in the compliance plan to show the progress of actions taken.

G. Compliance Plan (Reserved)

X. AIR EMISSION STANDARDS

Process Vents and Equipment Leaks

1. Emissions from this facility must not cause or contribute to a condition of "air pollution" as defined in Section 382.003 of the Texas Health and Code Ann. or violate Section 382.085 of the Texas Health and Safety Code Ann. If the Executive Director of the TCEQ determines that such a condition or violation occurs, the permittee shall implement additional abatement measures as necessary to control or prevent the condition or violation.
2. Requirements for Subparts AA and BB
 - a. The permittee must comply with the requirements of 30 TAC Section 335.152(a)(17)/40 CFR Part 264 Subpart AA and 30 TAC Section 335.152(a)(18)/40 CFR Part 264 Subpart BB, as applicable.
 - b. The permittee shall include in the Biennial Report, required in Provision II.B.7., a statement that hazardous waste management units or associated ancillary equipment at this facility are not subject to any of the requirements in Provision X.2.a.; if these requirements are not applicable to any hazardous waste management units or associated ancillary equipment at this facility. If at any time any hazardous waste management units or associated ancillary equipment become subject to the requirements in Provision X.2.a., the permittee must immediately comply with these requirements.
3. Requirements for Subpart CC

The permittee must comply with the requirements of 40 CFR Part 264 Subpart CC, as applicable.

TABLE III.D. INSPECTION SCHEDULE

<i>Facility Unit(s) and Basic Elements</i>	<i>Possible Error, Malfunction, or Deterioration</i>	<i>Frequency of Inspection</i>
Tanks/Tank Farms	Signs of tank leakage or spills	Daily
	Excessive corrosion of tanks, leaking piping and appurtenances	Daily
	Cracks or deterioration in secondary containment, cracking of containment coating	Weekly
	Corrosion, deterioration, or damage to tank structural supports	Weekly
Truck Stations and Railcar Facility	Signs of leakage or spills, Cracks or deterioration in secondary containment	Daily
Containers/Container Storage Areas	Leaks, liquids in sumps, missing bungs, tops, and labels, inadequate aisle spacing, unstable container stacking	Daily
	Cracks, spalling, or deterioration of secondary containment system	Weekly
Fuels Blending, Thermal, Debris Bulking, Aqueous Treatment Systems, and Process Equipment	Signs of leakage or spills	Daily
	Excessive corrosion of units, leaking piping and appurtenances	Daily
	Cracks or deterioration in secondary containment	Weekly
Security and Communication Systems, and Safety and Emergency Response Equipment,	Fences and Gates Secure, Telephones Operating, Eyewash/Showers Functioning Emergency Response inventory available and accessible	Weekly
		Revision 1 (10/11/04)

TABLE III.E.3. EMERGENCY EQUIPMENT

<i>Equipment</i>	<i>Location</i>	<i>Physical Description</i>	<i>Capabilities</i>
Fire Extinguishers	Multiple Locations (See Exhibits 7 & 8)	10 lb. and 20 lb. hand held and 150 lb. cart units	ABC type universal systems effective on paper, wood, and electrical fires as well as solvents
Fire Suppression System	Plant Wide	Foam Fire Suppression System	Universal system to extinguish fires
Telephone System	Administrative, Production, and Maintenance Offices, Laboratory, Shipping and Receiving Docks	Telephone System	Internal and External Communication
Absorbent	Spill Response Boxes	Granular and Pad Type	Contain and absorb spills
Safety Equipment (gloves, goggles, respirators, chemical resistant aprons, and boots)	Spill Response Boxes	Personal Protective Equipment	Provide employee protection while responding to a spill or incident
Eyewash/Safety Showers	Multiple Locations (See Exhibits 7 & 8)	Emergency Eyewash and Shower Stands	Remove contaminants in the event of an incident
First Aid Kits	Main Office, Production Areas, & Maintenance Shop	Basic First Aid Items (band aids, ointments, etc.)	Basic first aid for minor cuts, scrapes, etc.

TABLE IV.B. WASTES MANA IN PERMITTED UNITS

No.	Waste	EPA Hazardous Waste Numbers	TCEQ Waste Form Codes and Classification Codes
1	Spent Parts Cleaning Solution	D001, Varies	203-H,1,2; 202-H,1,2; 101-H,1,2; Varies
2	Spent Immersion Cleaner	D006, Varies	203-H,1,2; Varies
3	Dry Cleaning	F002, D039; Varies	609-H,1,2; 310-H,1,2; 101-H,1,2; Varies
4	Tank Sediment	D001, Varies	695-H,1,2; Varies
5	Dumpster Sediment	D001, Varies	695-H,1,2; Varies
6	Paint Waste	F001-F005, D001, Varies	209-H,1,2; 211-H,1,2; 310-H,1,2; Varies
7	Spent Antifreeze	D008, Varies	296-H,1,2; Varies
8	Soils/Liquid-Solid Debris/Absorbents/ PPE/Sludges for Recycling, Fuel Blending, or Bulking	F001-F005, D001, Varies	407-H,1,2; 409-H,1,2; 489-H,1,2; 301-H,1,2; 403-H,1,2; Varies
9	Spent Halogenated Solvents/ Chemicals for Recycling, Fuel Blending, or Bulking	F001, F002, D001, Varies	202-H,1,2; 201-H,1,2; 204-H,1,2; 205-H,1,2; 101-H,1,2; 102-H,1,2; Varies
10	Spent Non-Halogenated Solvents/ Chemicals for Recycling, Fuel Blending, or Bulking	F003-F005, D001, Varies	201-H,1,2; 205-H,1,2; 101-H,1,2; 102-H,1,2; Varies
11	Wastes for Fuel Blending or Bulking	F001-F005, D001, Varies	201-H,1,2; 202-H,1,2; 203-H,1,2; 204-H,1,2; 101-H,1,2; 102-H,1,2; Varies
12	Solids for Fuel Blending or Bulking	F001-F005, D001, Varies	301-H,1,2; 302-H,1,2; 310-H,1,2; 319-H,1,2; 403-H,1,2; 407-H,1,2; 408-H,1,2; Varies
13	Carbon Filter Solids	F001-F005, D001, Varies	310-H,1,2; 319-H,1,2; 404-H,1,2; Varies
14	Wastewater for Recycling, Fuel Blending, or Bulking	F001-F005, D001, Varies	101-H,1,2; 102-H,1,2; 105-H,1,2; 110-H,1,2; 113-H,1,2; 114-H,1,2; Varies
15	Mixed Lab Packs for Storage and Processing	F001-F005, D012-D017, Varies	003-H,1,2; 001-H,1,2; 002-H,1,2; 004-H,1,2; 009-H,1,2; Varies
16	Acidic Waste	D002, Varies	103-H,1,2; 104-H,1,2; Varies

TABLE IV.B. WASTES MANAGED IN PERMITTED UNITS

No.	Waste	EPA Hazardous Waste Numbers	TCEQ Waste Form Codes and Classification Codes
17	Caustic Waste	D002, Varies	106-H,1,2; 107-H,1,2; 108-H,1,2; 109-H,1,2; 110-H,1,2; Varies
18	Waste for Storage	All, Varies	All, Varies
19	PCB Waste	F001-F002, D001, Varies	297-H,1,2; 298-H,1,2; 497-H,1,2; 498-H,1,2; Varies
20	Photoimaging Waste	D011, Varies	119-H,1,2; 198-H,1,2; 219-H,1,2; 109-H,1,2; 110-H,1,2; Varies
21	Oil/Oil Filters	D001, D008, Varies	206-H,1,2; 205-H,1,2; 319-H,1,2; Varies
22	Empty Containers	NA	308-1,2; 406-1,2; 388-1,2; Varies
23	Scrap Metal	NA	307-1,2; 308-1,2; Varies
24	Compressed Gases	F001-F005, D001, Varies	701-H,1,2; 801-H,1,2; Varies
25	Plant Trash	NA	902-1,2; 999-1,2; Varies

Part B Table IV.B Attachment

NOTE (A): The EPA Waste Codes below may apply (in the Column: EPA Hazardous Waste Number) to each of the Verbal Descriptions of Waste in Part B Table IV.B. Waste codes in "bold" text are waste codes requested in the permit amendment and will be newly authorized waste codes.

D001	D002	D003	D004	D005	D006	D007	D008	D009	D010	D011	D012
D013	D014	D015	D016	D017	D018	D019	D020	D021	D022	D023	D024
D025	D026	D027	D028	D029	D031	D032	D033	D034	D035	D036	D037
D038	D039	D040	D041	D042	D043						

F001	F002	F003	F004	F005	F006	F007	F008	F009	F010	F011	F012
F019	F024	F025	F032	F033	F034	F035	F037	F038	F039		

K001	K002	K003	K004	K005	K006	K007	K008	K009	K010	K011	K013
K014	K015	K016	K017	K018	K019	K020	K021	K022	K023	K024	K025
K026	K027	K028	K029	K030	K031	K032	K033	K034	K035	K036	K037
K038	K039	K040	K041	K042	K043	K046	K048	K049	K050	K051	K052
K060	K061	K062	K064	K065	K066	K068	K071	K073	K083	K084	K085
K086	K087	K088	K090	K091	K093	K094	K095	K096	K097	K098	K099
K100	K101	K102	K103	K104	K105	K106	K107	K108	K109	K110	K111
K112	K113	K114	K115	K116	K117	K118	K123	K124	K125	K126	K131
K132	K136	K140	K141	K142	K143	K144	K145	K147	K148	K149	K150
K151	K156	K157	K158	K159	K160	K169	K170	K171	K172	K174	K175
K176	K177	K178									

P001	P002	P003	P004	P005	P007	P008	P010	P011	P012	P013	P014
P015	P016	P017	P018	P020	P021	P022	P023	P024	P026	P027	P028
P029	P030	P031	P033	P034	P036	P037	P038	P039	P040	P041	P042
P043	P044	P045	P046	P047	P048	P049	P050	P051	P054	P056	P057
P058	P059	P060	P062	P063	P064	P065	P066	P067	P068	P069	P070
P071	P072	P073	P074	P075	P076	P077	P078	P081	P082	P084	P085
P087	P088	P089	P092	P093	P094	P095	P096	P097	P098	P099	P101
P102	P103	P104	P105	P106	P108	P109	P110	P111	P112	P113	P114
P115	P116	P118	P119	P120	P121	P123	P127	P128	P185	P188	P189
P190	P 191	P 192	P 194	P196	P 197	P198	P199	P201	P202	P203	P204
P205											

U001	U002	U003	U004	U005	U007	U008	U009	U010	U011	U012	U014
U015	U016	U017	U018	U019	U021	U022	U024	U025	U026	U027	U028
U029	U030	U031	U032	U034	U035	U036	U037	U038	U039	U041	U042
U043	U044	U045	U046	U047	U048	U049	U050	U051	U052	U053	U055
U056	U057	U058	U059	U060	U061	U062	U063	U064	U066	U067	U068
U069	U070	U071	U072	U073	U074	U075	U076	U077	U078	U079	U080
U081	U082	U083	U084	U085	U086	U087	U088	U089	U090	U091	U092
U093	U094	U095	U097	U098	U099	U101	U102	U103	U105	U106	U107
U108	U109	U110	U111	U112	U113	U114	U115	U116	U117	U118	U119

Part B Table IV.B Attachment

NOTE (A): The EPA Waste Codes below may apply (in the Column: EPA Hazardous Waste Number) to each of the Verbal Descriptions of Waste in Part B Table IV.B. Waste codes in "bold" text are waste codes requested in the permit amendment and will be newly authorized waste codes.

U120	U121	U122	U123	U124	U125	U126	U127	U128	U129	U130	U131
U132	U134	U135	U136	U137	U138	U140	U141	U142	U143	U144	U145
U146	U147	U148	U149	U150	U151	U152	U153	U154	U155	U156	U157
U158	U159	U161	U162	U163	U164	U165	U166	U167	U168	U169	U170
U171	U172	U173	U174	U176	U177	U178	U179	U180	U181	U182	U183
U184	U185	U186	U187	U188	U190	U191	U192	U193	U194	U196	U197
U200	U201	U202	U203	U204	U206	U207	U208	U209	U210	U211	U213
U214	U215	U216	U217	U218	U219	U220	U221	U222	U225	U226	U227
U228	U235	U236	U237	U238	U239	U240	U243	U244	U246	U247	U248
U249	U271	U277	U278	U279	U280	U328	U353	U359	U364	U365	U366
U367	U372	U373	U375	U376	U377	U378	U379	U381	U382	U383	U384
U385	U386	U387	U389	U390	U391	U392	U393	U394	U395	U396	U400
U401	U402	U403	U404	U407	U408	U410	U411				

NOTE (B): All TCEBQ Waste Form Codes and Classification Codes may apply to the waste streams identified in the Column: TCEBQ Waste Form Codes and Classification Codes. Typical form and classification codes have been included in Part B Table IV.B.

TABLE IV.C. SAMPLING AND ANALYTICAL METHODS

<i>Waste No.¹</i>	<i>Sampling Location</i>	<i>Sampling Method</i>	<i>Frequency</i>	<i>Parameter</i>	<i>Test Method</i>	<i>Desired Accuracy Level</i>
1	Tanker	Coliwasa	Each Shipment	Flash	SK9401	+/- 95°F
2	Tank	Open End Pipe	Once per month	PCB	SK19202	2 ppm
3	Random Container	Open End Pipe	Once per month	PCB	SK19202	2 ppm
4	Tanker	Coliwasa	Each Shipment	Flash	SK9401	+/- 95°F
5	Random Container	Coliwasa	Each Shipment	Flash	SK9401	+/- 95°F
6	Tank	Open End Pipe	One/Tank	PCB	SK19202	2 ppm
7	Tank	Open End Pipe	One/Tank	PCB	SK19202	2 ppm
8	Container	Scoop/Auger	Each Shipment	PCB	SK19202	2 ppm
9	Container	Coliwasa	Each Shipment	PCB	SK19202	2 ppm
10	Container	Coliwasa	Each Shipment	PCB	SK19202	2 ppm
11	Container	Coliwasa	Each Shipment	PCB	SK19202	2 ppm
12	Container	Scoop/Auger	Each Shipment	PCB	SK19202	2 ppm
13	Container	Scoop/Auger	Each Shipment	PCB	SK19202	2 ppm
14	Container	Coliwasa	Each Shipment	PCB	SK19202	2 ppm
15	Container (if process)	Coliwasa	Each Shipment	PCB	SK19202	2 ppm
16	Container	Coliwasa	Each Shipment	pH	SK9906	Std. Units
17	Container	Coliwasa	Each Shipment	pH	SK9906	Std. Units
18	None ²	None	None	None	None	None
19	Container	Coliwasa	Each Shipment	PCB	SK19202	2 ppm
20	Tank	Open End Pipe	One/Tank	PCB	SK19202	2 ppm

¹ From Table IV.B, first column² Transshipment wastes not subject to sampling per WAP

TABLE IV.C. SAMPLING AND ANALYTICAL METHODS

<i>Waste No.¹</i>	<i>Sampling Location</i>	<i>Sampling Method</i>	<i>Frequency</i>	<i>Parameter</i>	<i>Test Method</i>	<i>Desired Accuracy Level</i>
21	Container	Coliwasa	Each Shipment	PCB	SK19202	2 ppm
22	NA	NA	NA	NA	NA	NA
23	NA	NA	NA	NA	NA	NA
24	NA	NA	NA	NA	NA	NA
25	NA	NA	NA	NA	NA	NA

¹from Table IV.B, first column

TABLE V.B. CONTAINER STORAGE AREAS

No.	Container Storage Area	N.O.R. Unit #	Rated Capacity	Dimensions	Containment Volume (including rainfall for unenclosed areas)	Unit will manage Ignitable, ¹ Reactive, ¹ or Incompatible ² Waste (state all that apply)
118	Container Storage Area 1 (P/C)	001	91,080 gal.	100' x 30'	9,108 gal.	I, R, Inc.
119	Container Storage Area 2 (P/C)	002	150,480 gal.	125' x 60'	28,050 gal.	I, R, Inc.
120	Container Storage Area 3 (P/C)*	022	633,600 gal.	80' x 400'	155,904 gal.	I, R, Inc.
121	Container Storage Area 4 (P/C)	004	43,560 gal.	74' x 39'	21,587 gal.	I, R, Inc.
139	Container Storage Area 5 (NP/C)	108	25,520 gal.	79' x 29'	2,553 gal.	I, R, Inc.
133	Rail Facility (P/NC)	104	96,000 gal.	152' x 12'	45,849 gal.	I
130	Truck Station 3 (P/C)	040	28,482 gal./141 c.y.	42' x 40'	NA	I, R, Inc.
125	Truck Station 4 (P/NC)	003	99,640 gal.	72' x 37'	9,964 gal.	I, R, Inc.
126	Truck Station 5 (P/C)	038	71,832 gal.	41' x 94'	7,183 gal.	I, R, Inc.
129	Container Storage (Scrap Metal) (P/C)	039	9,494 gal./47 c.y.	20' x 40'	NA	NA

¹Containers managing ignitable or reactive waste must be located at least 15 meters (50 feet) from the facility's property line.

²Incompatible waste must be separated from other waste or materials stored nearby in other containers, piles, open tanks, or surface impoundments by means of a dike, berm, wall, or other device.

P = Currently Permitted

NP = Not Currently Permitted/Included in Amendment

C = Constructed/Existing

NC = Not Constructed/Construction Proposed

* Container Storage Area No. 3 is currently permitted for 633,600 gallons, but only 200,000 gallons is currently constructed.

Revision No. 1 (10/11/04)

TABLE V.C TANKS AND TANK SYSTEMS

No.	Tank	N.O.R. Unit #	Storage and/or Processing	Waste No.s ¹	Rated Capacity	Dimensions	Containment Volume (including rainfall for unenclosed areas)	Unit Will Manage Ignitable, Reactive, or Incompatible Waste (State all that apply)
1	Tank 1	Prop.	X	1, 2, 3, 4, 5, 6, 7, 8, 9, 10, 12, 13, 14, 16, 17, 20, 21	18,500 gal.	Dia=10.5' H=32'	113,860 gal.	I
2	Tank 2	Prop.	X	"	18,500 gal.	Dia=10.5' H=32'	113,860 gal.	I
3	Tank 3	Prop.	X	"	18,500 gal.	Dia=10.5' H=32'	113,860 gal.	I
4	Tank 4	Prop.	X	"	18,500 gal.	Dia=10.5' H=32'	113,860 gal.	I
5	Tank 5	Prop.	X	"	18,500 gal.	Dia=10.5' H=32'	113,860 gal.	I
6	Tank 6	Prop.	X	"	18,500 gal.	Dia=10.5' H=32'	113,860 gal.	I
11	Tank 11	Prop.	X	"	18,500 gal.	Dia=10.5' H=32'	113,860 gal.	I
12	Tank 12	031	X	"	20,000 gal.	Dia=10.5' H=32'	113,860 gal.	I
13	Tank 13	Prop.	X	"	15,000 gal.	Dia=10.5' H=24'	113,860 gal.	I
14	Tank 14	032	X	"	15,000 gal.	Dia=10.5' H=24'	113,860 gal.	I

¹from Table IV.B, first column

TABLE V.C TANKS AND TANK SYSTEMS

No.	Tank	N.O.R. Unit #	Storage and/or Processing	Waste No.s ¹	Rated Capacity	Dimensions	Containment Volume (including rainfall for unenclosed areas)	Unit Will Manage Ignitable, Reactive, or Incompatible Waste (State all that apply)
16	Tank 16	Prop.	X	1, 2, 3, 4, 5, 6, 7, 8, 9, 10, 12, 13, 14, 16, 17, 20, 21	18,500 gal.	Dia=10.5' H=32'	113,860 gal.	I
17	Tank 17	005	X	"	15,000 gal.	Dia=10.5' H=24'	113,860 gal.	I
18	Tank 18	006	X	"	20,000 gal.	Dia=10.5' H=32'	113,860 gal.	I
19	Tank 19	007	X	"	20,000 gal.	Dia=10.5' H=32'	113,860 gal.	I
20	Tank 20	008	X	"	20,000 gal.	Dia=10.5' H=32'	113,860 gal.	I
21	Tank 21	Prop.	X	"	18,500 gal.	Dia=10.5' H=32'	113,860 gal.	I
22	Tank 22	033	X	"	15,000 gal.	Dia=10.5' H=32'	113,860 gal.	I
25	Tank 25	009	X	"	15,000 gal.	Dia=10.5' H=24'	113,860 gal.	I
26	Tank 26	Prop.	X	"	18,500 gal.	Dia=10.5' H=32'	113,860 gal.	I
27	Tank 27	010	X	"	15,000 gal.	Dia=10.5' H=24'	113,860 gal.	I

¹from Table IV.B, first column

TABLE V.C TANKS AND TANK SYSTEMS

No.	Tank	N.O.R. Unit #	Storage and/or Processing	Waste No.s ¹	Rated Capacity	Dimensions	Containment Volume (including rainfall for unenclosed areas)	Unit Will Manage Ignitable, Reactive, or Incompatible Waste (State all that apply)
28	Tank 28	011	X	1, 2, 3, 4, 5, 6, 7, 8, 9, 10, 12, 13, 14, 16, 17, 20, 21	15,000 gal.	Dia=10.5' H=24'	113,860 gal.	I
29	Tank 29	012	X	"	15,000 gal.	Dia=10.5' H=24'	113,860 gal.	I
30	Tank 30	013	X	"	15,000 gal.	Dia=10.5' H=24'	113,860 gal.	I
31	Tank 31	Prop.	X	"	18,500 gal.	Dia=10.5' H=32'	113,860 gal.	I
32	Tank 32	014	X	"	15,000 gal.	Dia=10.5' H=24'	113,860 gal.	I
33	Tank 33	015	X	"	15,000 gal.	Dia=10.5' H=24'	113,860 gal.	I
34	Tank 34	016	X	"	15,000 gal.	Dia=10.5' H=24'	113,860 gal.	I
35	Tank 35	017	X	"	15,000 gal.	Dia=10.5' H=24'	113,860 gal.	I
36	Tank 36	Prop.	X	"	18,500 gal.	Dia=10.5' H=32'	36,053 gal.	I
37	Tank 37	Prop.	X	"	18,500 gal.	Dia=10.5' H=32'	36,053 gal.	I

¹from Table IV.B, first column

TABLE V.C TANKS AND TANK SYSTEMS

No.	Tank	N.O.R. Unit #	Storage and/or Processing	Waste No.s ¹	Rated Capacity	Dimensions	Containment Volume (including rainfall for unenclosed areas)	Unit Will Manage Ignitable, Reactive, or Incompatible Waste (State all that apply)
38	Tank 38	Prop.	X	1, 2, 3, 4, 5, 6, 7, 8, 9, 10, 12, 13, 14, 16, 17, 20, 21	18,500 gal.	Dia=10.5' H=32'	36,053 gal.	I
39	Tank 39	Prop.	X	"	18,500 gal.	Dia=10.5' H=32'	36,053 gal.	I
40	Tank 40	Prop.	X	"	18,500 gal.	Dia=10.5' H=32'	36,053 gal.	I
41	Tank 41	Prop.	X	"	18,500 gal.	Dia=10.5' H=32'	36,053 gal.	I
42	Tank 42	Prop.	X	"	18,500 gal.	Dia=10.5' H=32'	36,053 gal.	I
43	Tank 43	Prop.	X	"	18,500 gal.	Dia=10.5' H=32'	36,053 gal.	I
44	Tank 44	Prop.	X	"	18,500 gal.	Dia=10.5' H=32'	36,053 gal.	I
45	Tank 45	Prop.	X	"	18,500 gal.	Dia=10.5' H=32'	36,053 gal.	I
46	Tank 46	Prop.	X	"	18,500 gal.	Dia=10.5' H=32'	36,053 gal.	I
47	Tank 47	Prop.	X	"	18,500 gal.	Dia=10.5' H=32'	36,053 gal.	I

¹from Table IV.B, first column

TABLE V.C TANKS AND TANK SYSTEMS

No.	Tank	N.O.R. Unit #	Storage and/or Processing	Waste No.s ¹	Rated Capacity	Dimensions	Containment Volume (including rainfall for unenclosed areas)	Unit Will Manage Ignitable, Reactive, or Incompatible Waste (State all that apply)
48	Tank 48	034	X	1, 2, 3, 4, 5, 6, 7, 8, 9, 10, 12, 13, 14, 16, 17, 20, 21	18,500 gal.	Dia=10.5' H=32'	36,053 gal.	I
49	Tank 49	035	X	"	18,500 gal.	Dia=10.5' H=32'	36,053 gal.	I
50	Tank 50	036	X	"	18,500 gal.	Dia=10.5' H=32'	36,053 gal.	I
51	Tank 51	037	X	"	18,500 gal.	Dia=10.5' H=32'	36,053 gal.	I
52	Tank 52	Prop.	X	"	18,500 gal.	Dia=10.5' H=32'	36,053 gal.	I
53	Tank 53	Prop.	X	"	18,500 gal.	Dia=10.5' H=32'	36,053 gal.	I
54	Tank 54	Prop.	X	"	18,500 gal.	Dia=10.5' H=32'	36,053 gal.	I
55	Tank 55	Prop.	X	"	18,500 gal.	Dia=10.5' H=32'	36,053 gal.	I
56	Tank 56	Prop.	X	"	18,500 gal.	Dia=10.5' H=32'	36,053 gal.	I
57	Tank 57	Prop.	X	"	18,500 gal.	Dia=10.5' H=32'	36,053 gal.	I

¹from Table IV.B, first column

TABLE V.C TANKS AND TANK SYSTEMS

No.	Tank	N.O.R. Unit #	Storage and/or Processing	Waste No.s ¹	Rated Capacity	Dimensions	Containment Volume (including rainfall for unenclosed areas)	Unit Will Manage Ignitable, Reactive, or Incompatible Waste (State all that apply)
58	Tank 58	Prop.	X	1, 2, 3, 4, 5, 6, 7, 8, 9, 10, 12, 13, 14, 16, 17, 20, 21	18,500 gal.	Dia=10.5' H=32'	36,053 gal.	I
59	Tank 59	Prop.	X	"	18,500 gal.	Dia=10.5' H=32'	36,053 gal.	I
60	Tank 60	023	X	"	18,500 gal.	Dia=10.5' H=32'	36,053 gal.	I
61	Tank 61	024	X	"	18,500 gal.	Dia=10.5' H=32'	36,053 gal.	I
62	Tank 62	025	X	"	18,500 gal.	Dia=10.5' H=32'	36,053 gal.	I
63	Tank 63	026	X	"	18,500 gal.	Dia=10.5' H=32'	36,053 gal.	I
64	Tank 64	027	X	"	18,500 gal.	Dia=10.5' H=32'	36,053 gal.	I
65	Tank 65	028	X	"	18,500 gal.	Dia=10.5' H=32'	36,053 gal.	I
66	Tank 66	029	X	"	18,500 gal.	Dia=10.5' H=32'	36,053 gal.	I
67	Tank 67	030	X	"	18,500 gal.	Dia=10.5' H=32'	36,053 gal.	I

¹from Table IV.B, first column

TABLE V.C TANKS AND TANK SYSTEMS

No.	Tank	N.O.R. Unit #	Storage and/or Processing	Waste No.s ¹	Rated Capacity	Dimensions	Containment Volume (including rainfall for unenclosed areas)	Unit Will Manage Ignitable, Reactive, or Incompatible Waste (State all that apply)
68	Tank 68	Prop.	X	1, 2, 3, 4, 5, 6, 7, 8, 9, 10, 12, 13, 14, 16, 17, 20, 21	100,000 gal.	Dia=22' H=36'	150,108 gal.	I
69	Tank 69	Prop.	X	"	100,000 gal.	Dia=22' H=36'	150,108 gal.	I
70	Tank 70	Prop.	X	"	100,000 gal.	Dia=22' H=36'	150,108 gal.	I
89	Tank 89	Prop.	X	"	39,500 gal.	Dia=13.5' H=43.3'	70,259 gal.	I
90	Tank 90	Prop.	X	"	39,500 gal.	Dia=13.5' H=43.3'	70,259 gal.	I
91	Tank 91	Prop.	X	"	39,500 gal.	Dia=13.5' H=43.3'	70,259 gal.	I
92	Tank 92	Prop.	X	"	39,500 gal.	Dia=13.5' H=43.3'	70,259 gal.	I
93	Tank 93	Prop.	X	"	39,500 gal.	Dia=13.5' H=43.3'	70,259 gal.	I
94	Tank 94	Prop.	X	"	39,500 gal.	Dia=13.5' H=43.3'	70,259 gal.	I
95	Tank 95	Prop.	X	"	39,500 gal.	Dia=13.5' H=43.3'	70,259 gal.	I

¹For. See Table IV.B, first column

TABLE V.C TANKS AND TANK SYSTEMS

No.	Tank	N.O.R. Unit #	Storage and/or Processing	Waste No.s ¹	Rated Capacity	Dimensions	Containment Volume (including rainfall for unenclosed areas)	Unit Will Manage Ignitable, Reactive, or Incompatible Waste (State all that apply)
96	Tank 96	Prop.	X	1, 2, 3, 4, 5, 6, 7, 8, 9, 10, 12, 13, 14, 16, 17, 20, 21	39,500 gal.	Dia=13.5' H=43.3'	70,259 gal.	I
97	Tank 97	Prop.	X	"	18,500 gal.	Dia=10.5' H=32'	28,139 gal.	I
98	Tank 98	Prop.	X	"	18,500 gal.	Dia=10.5' H=32'	28,139 gal.	I
99	Tank 99	Prop.	X	"	18,500 gal.	Dia=10.5' H=32'	28,139 gal.	I
100	Tank 100	Prop.	X	"	18,500 gal.	Dia=10.5' H=32'	28,139 gal.	I
111	Tank 111	019	X	"	20,000 gal.	Dia=10.5' H=32'	26,539 gal.	I
112	Tank 112	020	X	"	20,000 gal.	Dia=10.5' H=32'	26,539 gal.	I
113	Tank 113	021	X	"	10,000 gal.	Dia=10.5' H=24'	26,539 gal.	I
114	Tank 114	095	X	"	6,000 gal.	Dia=10' H=10'	26,539 gal.	I
131	E. Day Tank	102	X	"	2,500 gal.	Dia=7' H=15.5'	19,488 gal.	I

¹from Table IV.B, first column

TABLE V.K MISCELLANEOUS UNITS

List the miscellaneous units covered by this application to be permitted. List the waste managed in each unit and the rated capacity or size of each unit.

No.	Miscellaneous Unit	N.O.R. Unit #	Storage, Processing, and/or Disposal	Waste No.s ¹	Rated Capacity	Dimensions	Unit will manage Ignitable ² , Reactive ² , or Incompatible ² Waste (state all that apply)
134	LUWA 1	101	X	1, 2, 3, 7, 8, 10, 14, 20	1,500 gal./hr.	30' x 46'	I
138	LUWA 2	044	X	1, 2, 3, 7, 8, 10, 14, 20	2,000 gal./hr.	30' x 46'	I
136	Debris Bulking	100	X	3, 4, 5, 6, 8, 9, 10, 12, 13, 20, 21, 25	10,000 lb./day	7' x 7'	I
137	FRS/Fuel Blending	099	X	1, 2, 3, 4, 5, 6, 7, 8, 9, 10, 12, 13, 14, 16, 17, 20, 21	60,000 gal./day	65' x 80'	I
138	Thermal Process	098	X	1, 2, 3, 4, 5, 6, 7, 8, 9, 10, 12, 13, 14, 16, 17, 20, 21	6,000 lb./hr.	51' x 53'	I

¹from Table IV.B, first column

²If YES, describe in the engineering report the procedures used to ensure compliance with 40 CFR 264.17.

TABLE VII.E.1. - PERMITTED UNIT CLOSURE COST SUMMARY

Existing Unit Closure Cost Estimate		
Unit	Rated Capacity	Cost
Tank 12	20,000 gal	\$11,423
Tank 13	15,000 gal	\$8,567
Tank 14	15,000 gal	\$8,567
Tank 17	15,000 gal	\$8,567
Tank 18	20,000 gal	\$11,423
Tank 19	20,000 gal	\$11,423
Tank 20	20,000 gal	\$11,423
Tank 22	15,000 gal	\$8,567
Tank 25	15,000 gal	\$8,567
Tank 27	15,000 gal	\$8,567
Tank 28	15,000 gal	\$8,567
Tank 29	15,000 gal	\$8,567
Tank 30	15,000 gal	\$8,567
Tank 32	15,000 gal	\$8,567
Tank 33	15,000 gal	\$8,567
Tank 34	15,000 gal	\$8,567
Tank 35	15,000 gal	\$8,567
Tank Farm No. 1 Containment	7,992 s.f.	\$11,714
Tank 48	18,500 gal	\$10,567
Tank 49	18,500 gal	\$10,567
Tank 50	18,500 gal	\$10,567
Tank 51	18,500 gal	\$10,567
Tank Farm No. 4C Containment	3,103 s.f.	\$4,551
Tank 60	18,500 gal	\$10,567
Tank 61	18,500 gal	\$10,567
Tank 62	18,500 gal	\$10,567
Tank 63	18,500 gal	\$10,567
Tank 64	18,500 gal	\$10,567
Tank 65	18,500 gal	\$10,567
Tank 66	18,500 gal	\$10,567
Tank 67	18,500 gal	\$10,567
Tank Farm No. 4A Containment	3,103 s.f.	\$4,552

TABLE VII.E.1. - PERMITTED UNIT CLOSURE COST SUMMARY (CON'T)

Existing Unit Closure Cost Estimate		
Unit	Rated Capacity	Cost
Tank 111	20,000 gal	\$11,423
Tank 112	20,000 gal	\$11,423
Tank 113	10,000 gal	\$5,712
Tank 114	6,000 gal	\$3,427
Tank Farm No. 3 Containment	1,225 s.f.	\$1,797
Tank System (IC Empty - Permit Unit 115)	221 gal	\$126
Tank System (Auger 8A - Permit Unit 116)	535 gal	\$306
Tank System (Skip Hoist - Permit Unit 117)	200 gal	\$114
Truck Station No. 5 (Permitted as a Container Storage Area = Permit Unit 126)	71,832 gal	\$120,286
Container Storage Area (Permit Unit 130)	28,482 gal	\$47,695
Container Storage Area No. 1	91,080 gal	\$152,518
Container Storage Area No. 2	150,480 gal	\$251,986
Container Storage Area No. 3 (4 existing modules)	200,000 gal	\$334,910
Container Storage Area No. 4	43,560 gal	\$72,943
East Day Tank (Permit Unit 131)	2,500 gal	\$1,428
West Day Tank (Permit Unit 132)	2,500 gal	\$1,428
LUWA Thin film Evaporator No. 1 (Permit Unit 134)	1,500 gal/hr	\$2,553
LUWA Thin Film Evaporator No. 2 (Permit Unit 135)	2,000 gal/hr	\$2,553
Debris Bulking Process (Permit Unit 136)	10,000 lb/day	\$1,745
FRS (Fuel Blending) Process (Permit Unit 137)	60,000 gal/day	\$6,310
Thermal Processing Unit and Ancillary Equipment (Permit Unit 138)	6,000 lb/hr	\$11,001
Total Closure Administration and Certification Costs		\$39,100
Total Miscellaneous Closure Cost		\$40,460
Total Laboratory Chemical Removal Cost		\$11,942
Subtotal		\$1,433,329
15% Contingency		\$214,999
TOTAL EXISTING UNIT CLOSURE COST ESTIMATE		\$1,648,328(2004 Dollar)

TABLE VII.E.1. - PERMITTED UNIT CLOSURE COST SUMMARY (CON'T)

Not Constructed Unit Closure Cost Estimate		
Unit	Rated Capacity	Cost
Tank 1	18,500 gal	\$9,846
Tank 2	18,500 gal	\$9,846
Tank 3	18,500 gal	\$9,846
Tank 4	18,500 gal	\$9,846
Tank 5	18,500 gal	\$9,846
Tank 6	18,500 gal	\$9,846
Tank 11	18,500 gal	\$9,846
Tank 16	18,500 gal	\$9,846
Tank 21	18,500 gal	\$9,846
Tank 26	18,500 gal	\$9,846
Tank 31	18,500 gal	\$9,846
Tank Farm No. 1 Containment	7,992	See existing unit
Tank 36	18,500 gal	\$9,846
Tank 37	18,500 gal	\$9,846
Tank 38	18,500 gal	\$9,846
Tank 39	18,500 gal	\$9,846
Tank 40	18,500 gal	\$9,846
Tank 41	18,500 gal	\$9,846
Tank 42	18,500 gal	\$9,846
Tank 43	18,500 gal	\$9,846
Tank Farm No. 4D Containment	3,103 s.f. x \$1.8/s.f.	\$4,592
Tank 44	18,500 gal	\$9,846
Tank 45	18,500 gal	\$9,846
Tank 46	18,500 gal	\$9,846
Tank 47	18,500 gal	\$9,846
Tank Farm No. 4C Containment	3,103 s.f.	See existing unit
Tank 52	18,500 gal	\$9,846
Tank 53	18,500 gal	\$9,846
Tank 54	18,500 gal	\$9,846
Tank 55	18,500 gal	\$9,846
Tank 56	18,500 gal	\$9,846
Tank 57	18,500 gal	\$9,846
Tank 58	18,500 gal	\$9,846
Tank 59	18,500 gal	\$9,846

TABLE VII.E.1. - PERMITTED UNIT CLOSURE COST SUMMARY (CON'T)

Not Constrained Unit Closure Cost Estimate		
Unit	Rated Capacity	Cost
Tank Farm No. 4B Containment	3,103 s.f.	\$4,592
Tank 68	100,000 gal	\$53,222
Tank 69	100,000 gal	\$53,222
Tank 70	100,000 gal	\$53,222
Tank Farm No. 6 Containment	3,952 s.f.	\$5,848
Tank 89	39,500 gal	\$21,023
Tank 90	39,500 gal	\$21,023
Tank 91	39,500 gal	\$21,023
Tank 92	39,500 gal	\$21,023
Tank 93	39,500 gal	\$21,023
Tank 94	39,500 gal	\$21,023
Tank 95	39,500 gal	\$21,023
Tank 96	39,500 gal	\$21,023
Tank Farm No. 5A Containment	4,275 s.f.	\$6,326
Tank 97	18,500 gal	\$9,846
Tank 98	18,500 gal	\$9,846
Tank 99	18,500 gal	\$9,846
Tank 100	18,500 gal	\$9,846
Tank Farm No. 5B Containment	1,600 s.f.	\$2,368
Container Storage Area No. 3 (4 proposed modules)	433,600 gal	\$714,827
Container Storage Area (Rail Facility - Permit Unit 133)	96,000 gal	\$158,264
Container Storage Area No. 5	25,520 gal	\$42,072
Truck Station No. 4	99,640 gal	\$164,265
Total Closure Administration and Certification Costs		\$39,100
Total Miscellaneous Closure Cost		\$40,460
Total Laboratory Chemical Removal Cost		\$11,942
Subtotal		\$1,857,270
15% Contingency		\$278,591
TOTAL PROPOSED UNIT CLOSURE COST ESTIMATE		\$2,145,707 (2004 Dollar)

ERS & SU EYORS POB 1552
TOTAL OF 42.3385 ACRES.
SURVEY AB. 417, CITY & COUNTY OF DENTON, TEXAS
JOB NO 24628
OF 7

Permit No. 50163
Attachment A
sheet 1 of 2

HAMMETT & NASH, INC.

P.O. BOX 1552 - DENTON, TEXAS 76202
(817) 387-0506 - (817) 566-5427

FEBRUARY 6, 1990 JOB #24628

FIELD NOTES TO 21.1566 ACRES IN THE M. FORREST SURVEY ABSTRACT NUMBER 417, CITY AND COUNTY OF DENTON, TEXAS.

ALL THAT CERTAIN TRACT OR PARCEL OF LAND LYING IN THE M. FORREST SURVEY ABSTRACT NUMBER 417, CITY AND COUNTY OF DENTON, TEXAS, BEING ALL OF TRACT 1 AND PART OF TRACT 2 OF MARG-SAM SUBDIVISION, RECORDED IN VOLUME 11, PAGE 25, PLAT RECORDS, AND ALL OF A TRACT FROM ALPHA BETA COMPANY TO SAFETY-KLEEN CORPORATION ON THE 4TH DAY OF OCTOBER, 1989, RECORDED IN VOLUME 2661, PAGE 363, REAL PROPERTY RECORDS OF SAID COUNTY, AND BEING ALL OF A (CALLED) 4.0 ACRE TRACT FROM JAMES C. PAYNE, ET UX TO SAFETY-KLEEN CORPORATION ON THE 24TH DAY OF JANUARY, 1979, RECORDED IN VOLUME 934, PAGE 798, DEED RECORDS OF SAID COUNTY, AND BEING PART OF A (CALLED) 13.1602 ACRE TRACT FROM JAMES C. PAYNE, ET UX TO SAFETY-KLEEN CORPORATION ON THE 28TH DAY OF DECEMBER, 1988, RECORDED IN VOLUME 2507, PAGE 285, REAL PROPERTY RECORDS OF DENTON COUNTY, TEXAS, AND BEING MORE PARTICULARLY DESCRIBED AS FOLLOWS:

BEGINNING AT AN STEEL PIN BEING NORTH 00 DEGREES 49 MINUTES 39 SECONDS EAST A DISTANCE OF 215.51 FEET FROM THE SOUTH SOUTHWEST CORNER OF TRACT 2 OF MARG-SAM SUBDIVISION, CORNER ALSO BEING THE NORTHEAST CORNER OF A CALLED 0.484 ACRE TRACT 2 AS SHOWN IN A DEED FROM SAFETY-KLEEN CORPORATION TO ALPHA BETA COMPANY RECORDED IN VOLUME 2661, PAGE 583, REAL PROPERTY RECORDS OF DENTON COUNTY, TEXAS;

THENCE NORTH 87 DEGREES 08 MINUTES 48 SECONDS WEST WITH THE NORTH LINE OF SAID 0.484 ACRE TRACT A DISTANCE OF 221.04 FEET TO AN IRON PIN;

THENCE NORTH 87 DEGREES 27 MINUTES 13 SECONDS WEST WITH THE NORTH LINE OF SAID 0.484 ACRE TRACT A DISTANCE OF 220.17 FEET TO AN IRON PIN;

THENCE NORTH 87 DEGREES 31 MINUTES 13 SECONDS WEST WITH THE NORTH LINE OF SAID 0.484 ACRE TRACT A DISTANCE OF 237.41 FEET TO AN IRON PIN ON THE EAST RIGHT OF WAY LINE OF COOPER CREEK ROAD;

THENCE NORTHWESTERLY WITH THE EAST RIGHT OF WAY OF SAID COOPER CREEK ROAD AND WITH A CURVE TO THE LEFT HAVING A CENTRAL ANGLE OF 24 DEGREES 36 MINUTES 05 DECONDS, A RADIUS OF 540.00 FEET, A CHORD OF NORTH 11 DEGREES 05 MINUTES 16 SECONDS WEST 230.07 FEET, AND AN ARC DISTANCE OF 231.86 FEET TO A AN IRON PIN FOR CORNER;

THENCE NORTH 23 DEGREES 23 MINUTES 19 SECONDS WEST WITH THE EAST LINE OF SAID COOPER CREEK ROAD A DISTANCE OF 100.13 FEET TO A IRON PIN AT THE BEGINNING OF A CURVE TO THE RIGHT HAVING A RADIUS OF 460.00 FEET;

HAMMETT & NASH, INC.

P.O. BOX 1552 - DENTON, TEXAS 76202
(817) 387-0506 - (817) 566-5427

THENCE NORTHWESTERLY WITH SAID RIGHT OF WAY AND WITH SAID CURVE TO RIGHT HAVING A CENTRAL ANGLE OF 24 DEGREES 12 MINUTES 27 SECONDS, A CHORD OF NORTH 11 DEGREES 17 MINUTES 05 SECONDS WEST 192.91 FEET, AND AN ARC DISTANCE OF 194.35 FEET TO A IRON PIN AT THE END OF SAID CURVE;

THENCE NORTH 00 DEGREES 49 MINUTES 08 SECONDS EAST WITH THE EAST LINE OF SAID COOPER CREEK ROAD A DISTANCE OF 593.34 FEET TO AN IRON PIN ON THE SOUTH RIGHT OF WAY OF UNION PACIFIC RAILROAD;

THENCE NORTH 69 DEGREES 18 MINUTES 56 SECONDS EAST WITH THE SOUTH LINE OF SAID RAILROAD A DISTANCE OF 560.50 FEET TO AN IRON PIN AT THE NORTHEAST CORNER OF TRACT 1 OF MARG-SAM SUBDIVISION;

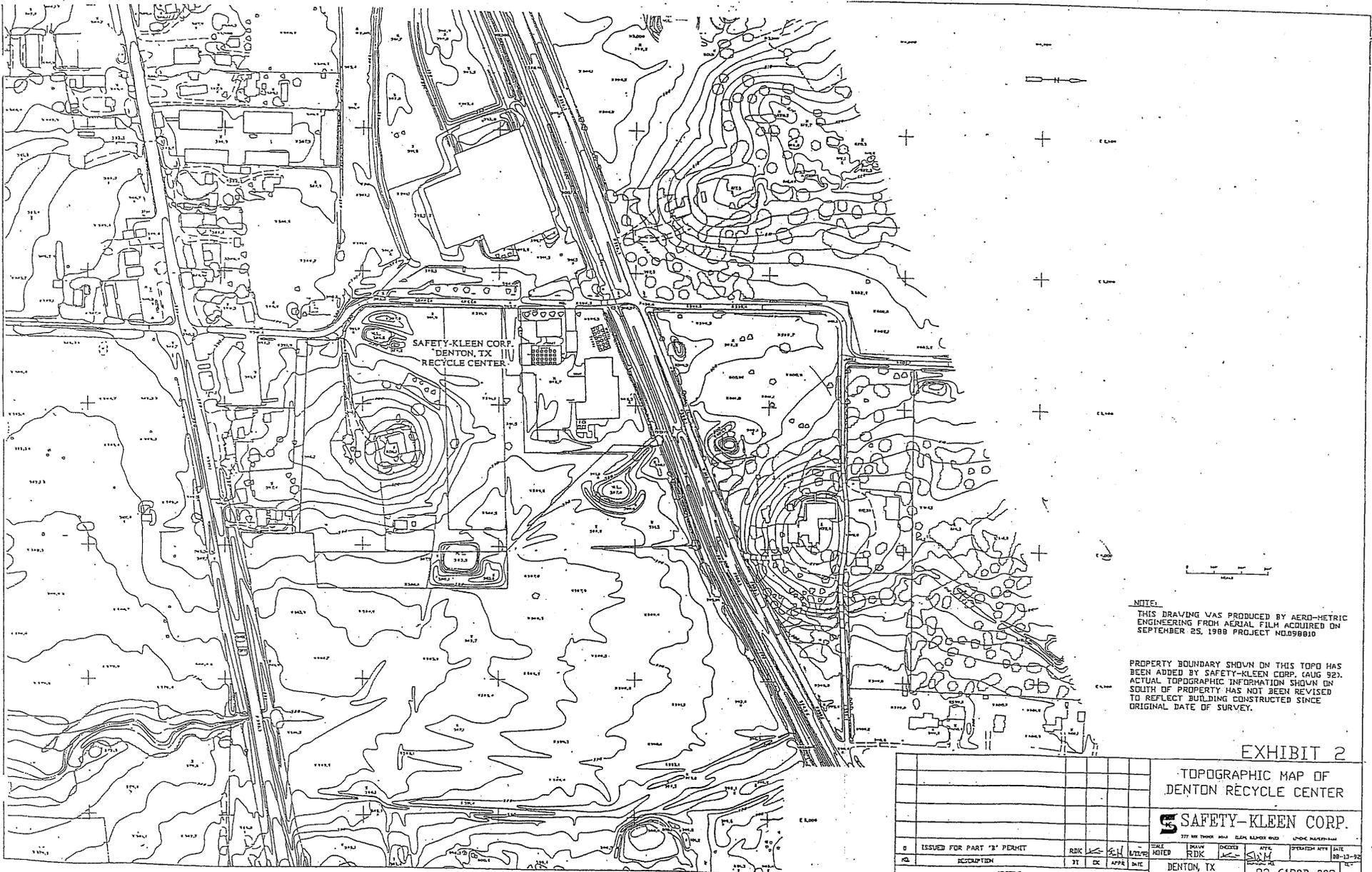
THENCE SOUTH 00 DEGREES 37 MINUTES 05 SECONDS WEST A DISTANCE OF 175.59 FEET TO AN IRON PIN IN THE SOUTHWEST LINE OF A 45 FOOT EASEMENT TO TMAPA;

THENCE SOUTH 38 DEGREES 18 MINUTES 38 SECONDS EAST WITH THE SOUTHWEST LINE OF SAID EASEMENT A DISTANCE OF 563.90 FEET TO AN IRON PIN;

THENCE SOUTH 00 DEGREES 59 MINUTES 25 SECONDS WEST A DISTANCE OF 661.89 FEET TO AN IRON PIN;

THENCE SOUTH 85 DEGREES 13 MINUTES 12 SECONDS WEST A DISTANCE OF 69.05 FEET TO A FENCE CORNER POST;

THENCE SOUTH 00 DEGREES 49 MINUTES 39 SECONDS WEST A DISTANCE OF 43.59 FEET TO THE POINT-OF-BEGINNING AND CONTAINING IN ALL 21.1566 ACRES OF LAND.



NOTE:
 THIS DRAWING WAS PRODUCED BY AERO-METRIC
 ENGINEERING FROM AERIAL FILM ACQUIRED ON
 SEPTEMBER 25, 1988 PROJECT NO.098810

PROPERTY BOUNDARY SHOWN ON THIS TOPO
 HAS BEEN ADDED BY SAFETY-KLEEN CORP. (AUG 92).
 ACTUAL TOPOGRAPHIC INFORMATION SHOWN ON
 SOUTH OF PROPERTY HAS NOT BEEN REVISED
 TO REFLECT BUILDING CONSTRUCTED SINCE
 ORIGINAL DATE OF SURVEY.

EXHIBIT 2

TOPOGRAPHIC MAP OF
 DENTON RECYCLE CENTER

SAFETY-KLEEN CORP.

0 ISSUED FOR PART "B" PERMIT		RDK	SK	UTZ	DATE	REVISED	BY	DATE	OPERATION	DATE
NO.	DESCRIPTION	BY	CHK	APP'D	DATE					
REVISIONS										
DENTON, TX RECYCLE CENTER										
92-6180B-003										

Permit No. 50163
 Attachment B
 Sheet 1 of 2

LIST OF INCORPORATED APPLICATION MATERIALS

The following is a list of Part A and Part B Industrial and Hazardous Waste Application elements which are incorporated into all Industrial and Hazardous Waste permits by reference as per Provision I.B.

TCEQ PART A Application Form

I. General Information

- I.B. - Authorized Agents
- I.C. - Identify entity who will conduct facility operation.
- I.D. - Facility Ownership

III. Wastes and Waste Management

- III.C.1. - Location of Waste Management Units - Topographic Map extending one mile beyond facility.

TCEQ PART B Application Form

I. General Information

- I.A. - Applicant
- I.C. - Facility Location - Address
- I.F. - Wastewater and Stormwater Disposition

II. Facility Siting Criteria (Not Applicable - the facility is an existing, not a new HWM facility)

III. Facility Management

- III.B. - Personnel Training Plan
- III.C. - Security
- III.D. - Inspection Schedule
- III.E. - Contingency Plan
 - III.E.1. - Arrangements with Local Authorities
 - III.E.2. - Emergency Coordinators List
 - III.E.3. - Emergency Equipment list

IV. Wastes and Waste Analysis

- IV.B. - Table IV.B. - Waste Managed in Permitted Units
- IV.C. - Table IV.C. - Sampling and Analytical Methods
- IV.D. - Waste Analysis Plan

V. - Engineering Reports

- V.A.1. - General Information
- V.B. - Container Storage area engineering reports includes Table V.B. Container Storage Area Summary
- V.C. - Tank and Tank System engineering report includes Table V.C. Tank and Tank System
- V.K. - Miscellaneous Units - Design Report, includes Table V.K.1. - Miscellaneous Units Summary

VI. Geology Report (Reserved)

VII. - Closure and Post-Closure Care Plans

- VII.A. - Closure-complete Table VII.A. and Closure Plan
- VII.E. - Table VII.E. Closure Cost Estimate

VIII. Financial Assurance

VIII.A.3. - Liability Requirements

VIII.B.1. - Applicant Financial Disclosure Statements

VIII.C.3. - New Commercial Hazardous Waste Management Facilities - emergency response assurance

IX. - Releases from Solid Waste Units & Corrective Action

IX.B.App. I - Facility and SWMU Location Maps

X. Air Emission Standards

Process Vents and Equipment Leaks

XII. Confidential Materials (Reserved)

Attachment D-Authorized Facility Units

PERM Unit No.	Unit Name	Unit Description	Capacity
1	Tank	Proposed, above grade, carbon steel, closed	18,500 gal
2	Tank	Proposed, above grade, carbon steel, closed	18,500 gal
3	Tank	Proposed, above grade, carbon steel, closed	18,500 gal
4	Tank	Proposed, above grade, carbon steel, closed	18,500 gal
5	Tank	Proposed, above grade, carbon steel, closed	18,500 gal
6	Tank	Proposed, above grade, carbon steel, closed	18,500 gal
7-10 (Reserved)	Product Tanks	Previously permitted, not constructed, not renewed	
11	Tank	Proposed, above grade, carbon steel, closed	18,500 gal
12	Tank	Above grade, carbon steel, closed	20,000 gal
13	Tank	Above grade, carbon steel, closed	15,000 gal
14	Tank	Above grade, carbon steel, closed	15,000 gal
15 (Reserved)	Product Tank	Previously permitted, not constructed, not renewed	
16	Tank	Proposed, above grade, carbon steel, closed	18,500 gal
17	Tank	Above grade, carbon steel, closed	15,000 gal
18	Tank	Above grade, carbon steel, closed	20,000 gal
19	Tank	Above grade, carbon steel, closed	20,000 gal
20	Tank	Above grade, carbon steel, closed	20,000 gal
21	Tank	Proposed, above grade, carbon steel, closed	18,500 gal
22	Tank	Above grade, carbon steel, closed	15,000 gal
23-24 (Reserved)	Product Tanks	Previously permitted, not constructed, not renewed	
25	Tank	Above grade, carbon steel, closed	15,000 gal
26	Tank	Proposed, above grade, carbon steel, closed	18,500 gal
27	Tank	Above grade, carbon steel, closed	15,000 gal
28	Tank	Above grade, carbon steel, closed	15,000 gal
29	Tank	Above grade, carbon steel, closed	15,000 gal
30	Tank	Above grade, carbon steel, closed	15,000 gal
31	Tank	Proposed, above grade, carbon steel, closed	18,500 gal
32	Tank	Above grade, carbon steel, closed	15,000 gal
33	Tank	Above grade, carbon steel, closed	15,000 gal
34	Tank	Above grade, carbon steel, closed	15,000 gal
35	Tank	Above grade, carbon steel, closed	15,000 gal
36	Tank	Proposed, above grade, carbon steel, closed	18,500 gal
37	Tank	Proposed, above grade, carbon steel, closed	18,500 gal

Attachment D-Authorized Facility Units

ICB# Permit Unit No.	Unit Name	Unit Description	Capacity
38	Tank	Proposed, above grade, carbon steel, closed	18,500 gal
39	Tank	Proposed, above grade, carbon steel, closed	18,500 gal
40	Tank	Proposed, above grade, carbon steel, closed	18,500 gal
41	Tank	Proposed, above grade, carbon steel, closed	18,500 gal
42	Tank	Proposed, above grade, carbon steel, closed	18,500 gal
43	Tank	Proposed, above grade, carbon steel, closed	18,500 gal
44	Tank	Proposed, above grade, carbon steel, closed	18,500 gal
45	Tank	Proposed, above grade, carbon steel, closed	18,500 gal
46	Tank	Proposed, above grade, carbon steel, closed	18,500 gal
47	Tank	Proposed, above grade, carbon steel, closed	18,500 gal
48	Tank	Above grade, carbon steel, closed	18,500 gal
49	Tank	Above grade, carbon steel, closed	18,500 gal
50	Tank	Above grade, carbon steel, closed	18,500 gal
51	Tank	Above grade, carbon steel, closed	18,500 gal
52	Tank	Proposed, above grade, carbon steel, closed	18,500 gal
53	Tank	Proposed, above grade, carbon steel, closed	18,500 gal
54	Tank	Proposed, above grade, carbon steel, closed	18,500 gal
55	Tank	Proposed, above grade, carbon steel, closed	18,500 gal
56	Tank	Proposed, above grade, carbon steel, closed	18,500 gal
57	Tank	Proposed, above grade, carbon steel, closed	18,500 gal
58	Tank	Proposed, above grade, carbon steel, closed	18,500 gal
59	Tank	Proposed, above grade, carbon steel, closed	18,500 gal
60	Tank	Above grade, carbon steel, closed	18,500 gal
61	Tank	Above grade, carbon steel, closed	18,500 gal
62	Tank	Above grade, carbon steel, closed	18,500 gal
63	Tank	Above grade, carbon steel, closed	18,500 gal
64	Tank	Above grade, carbon steel, closed	18,500gal
65	Tank	Above grade, carbon steel, closed	18,500gal
66	Tank	Above grade, carbon steel, closed	18,500gal
67	Tank	Above grade, carbon steel, closed	18,500gal
68	Tank	Proposed, above grade, carbon steel, closed	100,000 gal
69	Tank	Proposed, above grade, carbon steel, closed	100,000 gal
70	Tank	Proposed, above grade, carbon steel, closed	100,00 gal
71-88 (Reserved)	Product Tanks	Previously permitted, not constructed, not renewed	

Attachment D-Authorized Facility Units

ICAO Permit Unit No.	Unit Name	Unit Description	Capacity
89	Tank	Proposed, above grade, carbon steel, closed	39,500 gal
90	Tank	Proposed, above grade, carbon steel, closed	39,500 gal
91	Tank	Proposed, above grade, carbon steel, closed	39,500 gal
92	Tank	Proposed, above grade, carbon steel, closed	39,500 gal
93	Tank	Proposed, above grade, carbon steel, closed	39,500 gal
94	Tank	Proposed, above grade, carbon steel, closed	39,500 gal
95	Tank	Proposed, above grade, carbon steel, closed	39,500 gal
96	Tank	Proposed, above grade, carbon steel, closed	39,500 gal
97	Tank	Proposed, above grade, carbon steel, closed	18,500 gal
98	Tank	Proposed, above grade, carbon steel, closed	18,500 gal
99	Tank	Proposed, above grade, carbon steel, closed	18,500 gal
100	Tank	Proposed, above grade, carbon steel, closed	18,500 gal
101-110 (Reserved)	Product Tanks	Previously permitted, not constructed, not renewed	
111	Tank	Above grade, carbon steel, closed	20,000 gal
112	Tank	Above grade, stainless steel, closed	20,000 gal
113	Tank	Above grade, carbon steel, closed	10,000 gal
114	Tank	Above grade, carbon steel, closed	6,000 gal
115	Tank	Above grade, carbon steel, open	221 gal
116	Tank	Above grade, carbon steel, wet dumpster, open	535 gal
117	Tank	Above grade, carbon steel, wet dumpster, open	200 gal
118	Container Storage Area No. 1	Accumulation center, inside an existing building	91,080 gal
119	Container Storage Area No. 2	Accumulation center, inside an existing building	150,480 gal
120	Container Storage Area No. 3	Accumulation center, inside an existing building	633,600 gal
121	Container Storage Area No. 4	Accumulation center, located under an existing metal roof	43,560 gal

Attachment D-Authorized Facility Units

ICAO Permit Unit No.	Unit Name	Unit Description	Capacity
122-124 (Reserved)	Not used (CSA)	Previously permitted, ot constructed, not renewed	
125	Container Storage Area	Truck Station No. 4, loading/unloading truck station.	99,640 gal
126	Container Storage Area	Truck Station No. 5, loading/unloading truck station	71,832 gal
127-128 (Reserved)	Not used (CSA)	Previously permitted, not constructed, not renewed	
129	Container Storage Area (Scrap Metal)	Roll-off box/dump trailer, carbon steel, open	9,494 gal/47cu.yd
130	Container Storage Area	Truck Station No. 3, roll-off box/dump trailer, carbon steel, open	28,482 gal
131	Tank	East Day Tank, above grade, dish bottom, carbon steel	2,500 gal
132	Tank	West Day Tank, above grade, carbon steel	2,500 gal
133	Container Storage Area	Rail Facility, for processing of wastes	96,000 gal
134	LUWA 1	Thin Film Evaporator No. 1, for processing of wastes	1,500 gal/hr
135	LUWA 2	Thin Film Evaporator No. 2 for processing of wastes	2,000 gal/hr
136	Debris Bulking	Debris Bulking Process Unit for processing of wastes	10,000 gal/day
137	Fluid Fuel Service Fuel Blending	Fluid Fuel Service Processing Unit for processing of wastes	60,000 gal/day
138	Thermal Process	Thermal Processing Unit and Ancillary Equipment for processing of wastes	6,000 lb/hr
137	Fluid Fuel Service Fuel Blending	Fluid Fuel Service Processing Unit for processing of wastes	60,000 gal/day
138	Thermal Process	Thermal Processing Unit and Ancillary Equipment for processing of wastes	6,000 lb/hr
139 (Proposed)	Container Storage Area No. 5	Proposed, Container Storage Area, enclosed	25,520 gal

Attachment B
Technical Summary and
Executive Director's Preliminary Decision

TECHNICAL SUMMARY AND EXECUTIVE DIRECTOR'S PRELIMINARY DECISION

September 7, 2005

Description of Application

Applicant: Safety-Kleen Systems, Inc.
Hazardous Waste Permit No. 50163
Industrial Solid Waste Registration No. 65124
EPA Identification No. TXD077603371

Location: Safety-Kleen Systems, Inc. is located at 1722 Cooper Creek Road one-quarter mile north of State Route 380 at Cooper Creek Road on approximately 21.1566 acres in the City of Denton, Denton County, Texas. The site is within the drainage area of Segment No. 0823 of the Trinity River Basin North Latitude 33°14'15", West Longitude 97°04'53".

This facility is not located in an area affected by the Texas Coastal Management Program.

General: Safety-Kleen Systems, Inc. operates a solvent recycling/reclamation and fuels blending facility which accepts spent solvents, fuels, and other wastes from other Safety-Kleen service centers, toll customers and other industrial, commercial and government facilities. The facility conducts storage and processing of hazardous and non-hazardous wastes as a part of the commercial operations. Safety-Kleen Systems, Inc. is a commercial industrial and municipal hazardous waste management facility. Wastes which are recycled or reclaimed are returned to their customers as product. Wastes are received from off-site sources on a commercial basis. The wastes managed by the facility include industrial and municipal hazardous wastes and Class 1, Class 2, and Class 3 industrial solid waste.

The original permit was issued on August 9, 1994, for a term of ten years.

Request: Safety-Kleen Systems, Inc. has applied to the Texas Commission on Environmental Quality (TCEQ) for a permit renewal/major amendment for continued operation of seven (7) existing container storage areas, thirty-eight (38) existing tanks, five (5) existing miscellaneous units, forty-three (43) tanks (permitted but not constructed), and two (2) container storage areas (permitted but not constructed) for the storage and processing of industrial and municipal hazardous wastes and Class 1, Class 2 and Class 3 industrial solid waste. A major amendment has been requested to include a new container storage area and additional EPA waste codes. The application request dated March 8, 2004 was received on March 9, 2004.

Authority: The permit is required by 30 Texas Administrative Code (TAC) Sections 335.2 and 335.43, and Section 3005(c) of the Hazardous and Solid Waste Amendments of 1984 (HSWA). A draft permit has been prepared in accordance with applicable requirements of 30 TAC Chapters 335 and 305, which have been adopted under the authority of the TEXAS HEALTH AND SAFETY CODE ANN., Chapter 361 (Vernon Supp.), and Section 5.103, Texas Water Code Ann. (Vernon Supp.). In addition, a portion of the draft permit has been prepared under both State and Federal authority which implements applicable requirements of HSWA for which the TCEQ is not authorized. The permit must be signed by the TCEQ and EPA in order for the applicant to have a fully effective Resource Conservation and Recovery Act (RCRA) permit. The TCEQ and the EPA have entered into a Joint Permitting Agreement (JPA) whereby EPA accepts the applicant's information submitted through the State as a Federal application for purposes of implementing HSWA.

TECHNICAL SUMMARY AND EXECUTIVE DIRECTOR'S PRELIMINARY DECISION

Page 2

Technical Information

The proposed permit renewal includes the following:

- A. Establishes general provisions for construction, operation and closure of the subject facility units (30 TAC Chapter 335 Subchapter F and Chapter 350);
- B. Requires the permittee to establish and maintain financial assurance to provide for proper facility closure for existing units \$1,648,328 (2004 dollars) and \$2,145,707 (2004 Dollar) for the proposed units. (30 TAC Section 335.179);
- C. Requires the permittee to control access to the facility (40 CFR 264.14);
- D. Specifies minimum physical conditions, training, routine inspections and emergency procedures for the facility units (30 TAC Sections 335.153 and 335.177, 40 CFR Part 264, Subparts B, C and D);
- E. Standard permit provisions and other requirements pertaining to the management of industrial solid waste, including hazardous industrial solid wastes (40 CFR Part 264, Subpart B);
- F. Land Disposal Restrictions Provision II.A.7, which will implement the applicable requirements of HSWA upon issuance of the permit by EPA (40 CFR Part 268);
- G. The following is a brief description of waste management units and corresponding regulatory requirements encompassed by this permit:

Container storage area - design and operating requirements for the containment system; management, inspection and air emission requirements for the containers storing wastes; and closure requirements for the containers and containment system. (40 CFR Part 264, Subpart I)

Tank - design and installation requirements for the tank system including the tank, its associated ancillary equipment, the tank foundation and the containment system; operating, inspection and air emission requirements; requirements for response to leaks or spills; and closure and post-closure requirements. (40 CFR Part 264, Subpart J)

Miscellaneous units - design and operating requirements for the foundation and containment system; operating, inspection and air emission requirements; requirements for response to leaks or spills; and closure and post-closure requirements. (40 CFR Part 264, Subpart X)

Public Notice

The public notice should include the following language:

"This notice satisfies the requirements of the Resource Conservation and Recovery Act (RCRA), as amended, 42 U.S.C. 6901 et seq. and 40 CFR 124.10. Once the final permit decisions of the TCEQ and U.S. Environmental Protection Agency (EPA) are effective regarding this facility, they will implement the requirements of RCRA as amended by the Hazardous and Solid Waste Amendments of 1984 (HSWA). The final permit decisions will also implement the federally authorized State requirements. The TCEQ and EPA

TECHNICAL SUMMARY AND EXECUTIVE DIRECTOR'S PRELIMINARY DECISION

Page 3

have entered into a joint permitting agreement whereby permits will be issued in Texas in accordance with the Texas Solid Waste Disposal Act, Texas Health and Safety Code Ann., Chapter 361, and RCRA, as amended. In order for the applicant to have a fully effective RCRA permit, both the TCEQ and EPA must issue the permit. All permit provisions are fully enforceable under State and Federal law. The State of Texas has not received full HSWA authority. Areas in which the TCEQ has not been authorized by EPA are denoted in the draft permit with an asterisk (*). Persons wishing to comment or request a hearing on a HSWA requirement denoted with an asterisk (*) in the draft permit should also notify, in writing, Chief, RCRA Permits Branch, EPA Region 6, 1445 Ross Avenue, Dallas, Texas 75202-2733. EPA will accept hearing requests submitted to the TCEQ.”

Opportunity for Hearing

Before a permit can be issued, extended, or renewed, the TCEQ will provide an opportunity for a hearing to the applicant and persons affected. If a hearing is requested, the Commission will determine whether to grant or deny the hearing requests. If the hearing requests are denied, the draft permit may be considered for issuance by the Commission or the Executive Director. If the hearing requests are granted, the hearings will be conducted by the State Office of Administrative Hearings. EPA will reach a decision on the HSWA portion of the joint permit based on the hearing record developed by the TCEQ. The EPA portion of the permit implementing nonauthorized HSWA provisions will become effective thirty (30) days after the date of issuance if changes were required.

Decisions regarding the permit provisions issued under State authority may be reconsidered in response to a Motion for Rehearing or a Motion for Reconsideration and by appeal to a District Court in Travis County. Decisions regarding the permit provisions issued under Federal authority may be reconsidered in accordance with the procedures of 40 CFR 124.19.

Preliminary Decision

- General: The executive director has made a preliminary decision that this proposed permit renewal, if issued, meets all the statutory and regulatory requirements.
- Special: Parties have requested a hearing on the proposed permit renewal.

TECHNICAL SUMMARY AND EXECUTIVE DIRECTOR'S PRELIMINARY DECISION

Page 4

Additional Information

A. Technical information:

Joy H. Archuleta, Project Manager
Industrial and Hazardous Waste Permits Section
Waste Permits Division
Texas Commission on Environmental Quality
Mail Code MC 130
P. O. Box 13087
Austin, Texas 78711-3087
512/239-6595

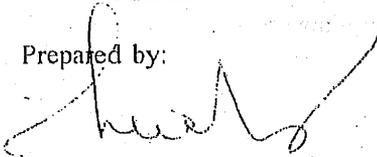
B. HSWA information:

Mr. Paul Sieminski, Section Chief
State/Tribal Oversight Section
U.S. Environmental Protection Agency
Region VI-6PD-O
1445 Ross Avenue
Dallas, Texas 75202-2733
214/665-6792

C. Procedural and public hearing information:

Office of Public Interest Counsel
Texas Commission on Environmental Quality
Mail Code MC 103
P. O. Box 13087
Austin, Texas 78711-3087
512/239-6363

Prepared by:


Joy H. Archuleta, Project Manager
Industrial and Hazardous Waste Permits Section
Waste Permits Division

Attachment C
Safety-Kleen's Compliance History

Compliance History

Owner/Respondent/Owner-Operator:	CN600128128 Safety-Kleen Systems, Inc.	Classification: AVERAGE	Rating: 1.64
Regulated Entity:	RN100215441 SAFETY-KLEEN SYSTEMS DENTON RECYCLING CENTER	Classification: AVERAGE	Site Rating: 18.18
ID Number(s):	AIR OPERATING PERMITS	ACCOUNT NUMBER	DF0042K
	AIR OPERATING PERMITS	PERMIT	1688
	INDUSTRIAL AND HAZARDOUS WASTE GENERATION	PERMIT	50163
	INDUSTRIAL AND HAZARDOUS WASTE GENERATION	EPA ID	TXD077603371
	INDUSTRIAL AND HAZARDOUS WASTE GENERATION	SOLID WASTE REGISTRATION # (SWR)	65124
	AIR NEW SOURCE PERMITS	PERMIT	2613
	AIR NEW SOURCE PERMITS	PERMIT	49452
	AIR NEW SOURCE PERMITS	PERMIT	DF0024K
	AIR NEW SOURCE PERMITS	PERMIT	52438
	AIR NEW SOURCE PERMITS	PERMIT	55001
	AIR NEW SOURCE PERMITS	ACCOUNT NUMBER	DF0042K
	AIR NEW SOURCE PERMITS	AFS NUM	0285
	AIR NEW SOURCE PERMITS	PERMIT	2613
	AIR NEW SOURCE PERMITS	PERMIT	2613A
	AIR NEW SOURCE PERMITS	PERMIT	16905
	AIR NEW SOURCE PERMITS	PERMIT	19435
	AIR NEW SOURCE PERMITS	PERMIT	29574
	AIR NEW SOURCE PERMITS	PERMIT	35598
	AIR NEW SOURCE PERMITS	PERMIT	49285
	AIR NEW SOURCE PERMITS	PERMIT	49452
	PETROLEUM STORAGE TANK REGISTRATION	REGISTRATION	74963
	USED OIL	REGISTRATION	A85080
	USED OIL	REGISTRATION	A85080
	IHW CORRECTIVE ACTION	SOLID WASTE REGISTRATION # (SWR)	65124
Location:	1722 COOPER CREEK RD, DENTON, TX, 76208		Rating Date: 9/1/2004 Repeat Violator: NO
TCEQ Region:	REGION 04 - DFW METROPLEX		
Date Compliance History Prepared:	July 26, 2005		
Agency Decision Requiring Compliance History:	Permit - Issuance, renewal, amendment, modification, denial, suspension, or revocation of a permit.		
Compliance Period:	March 08, 1999 to July 26, 2005		

TCEQ Staff Member to Contact for Additional Information Regarding this Compliance History

Name: Kimberly Sladek Phone: 239-1588

Site Compliance History Components

- | | |
|--|-----|
| 1. Has the site been in existence and/or operation for the full five year compliance period? | Yes |
| 2. Has there been a (known) change in ownership of the site during the compliance period? | No |
| 3. If Yes, who is the current owner? | N/A |
| 4. If Yes, who was/were the prior owner(s)? | N/A |
| 5. When did the change(s) in ownership occur? | N/A |

Components (Multimedia) for the Site :

- A. Final Enforcement Orders, court judgements, and consent decrees of the state of Texas and the federal government.

N/A

See addendum for information regarding federal actions.
- B. Any criminal convictions of the state of Texas and the federal government.

N/A
- C. Chronic excessive emissions events.

N/A
- D. The approval dates of investigations. (CCEDS Inv. Track. No.)

N/A	1	08/16/2004	(288143)
	2	06/03/2004	(264298)
	3	08/30/2002	(5519)
	4	09/30/2003	(35303)
	5	03/10/2000	(283812)
	6	08/19/2003	(143345)
	7	10/19/1999	(70897)
	8	09/24/2002	(12003)
	9	11/08/1999	(70898)
	10	12/14/1999	(70899)
	11	12/21/1999	(70900)
	12	02/11/2000	(70901)
	13	04/10/2000	(70902)
	14	05/31/2000	(70903)
	15	07/26/2000	(70904)
	16	09/01/2000	(70905)
	17	09/01/2000	(70906)
	18	09/01/2000	(70907)
	19	09/01/2000	(70908)
	20	09/01/2000	(70909)
	21	08/19/2003	(13407)
	22	09/11/2000	(70910)
	23	07/26/2001	(70911)
	24	09/07/2000	(145808)
	25	12/11/2001	(70912)
	26	06/21/2002	(70913)
	27	05/17/2005	(378103)
	28	06/24/2003	(35965)

E. Written notices of violations (NOV). (CCEDS Inv. Track. No.)

- Date: 08/25/2003 (143345) Classification: Moderate
 Self Report? NO
 Citation: 30 TAC Chapter 122, SubChapter C 122.210(a)
 30 TAC Chapter 122, SubChapter C 122.213(d)
 Description: Failed to submit the updated citations in the application to revise Permit O-01688 dated 9/12/02.
- Date: 08/30/2002 (5519) Classification: Moderate
 Self Report? NO
 Citation: 30 TAC Chapter 115, SubChapter C 115.216(3)(A)(iii)
 Description: Failed to keep a record of the date of the last leak testing of Trailer Nos. 357 and 500.
- Self Report? NO Classification: Moderate
 Citation: 30 TAC Chapter 122, SubChapter C 122.210(a)
 30 TAC Chapter 122, SubChapter C 122.213(d)
 Description: Failure to revise Operating Permit O-01688 within 30 days of the anniversary date of permit issuance to update Chapter 115 Vent Gas citations that were renumbered.

F. Environmental audits.

N/A

G. Type of environmental management systems (EMSs).

N/A

H. Voluntary on-site compliance assessment dates.

N/A

I. Participation in a voluntary pollution reduction program.

N/A

J. Early compliance.

N/A

Sites Outside of Texas

N/A

Compliance History

Customer/Respondent/Owner-Operator:	CN600128128 Safety-Kleen Systems, Inc.	Classification: AVERAGE	Rating: 1.64
Regulated Entity:	RN100546142 SAFETY-KLEEN ABILENE	Classification: AVERAGE	Site Rating
ID Number(s):	INDUSTRIAL AND HAZARDOUS WASTE GENERATION	PERMIT	50237
	INDUSTRIAL AND HAZARDOUS WASTE GENERATION	EPA ID	TXD062287883
	INDUSTRIAL AND HAZARDOUS WASTE GENERATION	SOLID WASTE REGISTRATION # (SWR)	64042
	AIR NEW SOURCE PERMITS	ACCOUNT NUMBER	TB0260D
	AIR NEW SOURCE PERMITS	PERMIT	50949
	USED OIL	REGISTRATION	A85168
	USED OIL	REGISTRATION	A85168
	STORMWATER	PERMIT	TXR051476
	STORMWATER	PERMIT	TXRNEQ923
	IHW CORRECTIVE ACTION	SOLID WASTE REGISTRATION # (SWR)	64042
Location:	4234 OIL BELT LN, ABILENE, TX, 79605	Rating Date: 9/1/2004	Repeat Violator: NO
TCEQ Region:	REGION 03 - ABILENE		
Date Compliance History Prepared:	July 26, 2005		
Agency Decision Requiring Compliance History:	Permit - Issuance, renewal, amendment, modification, denial, suspension, or revocation of a permit.		
Compliance Period:	March 08, 1999 to July 26, 2005		
TCEQ Staff Member to Contact for Additional Information Regarding this Compliance History			
Name:	Kimberly Sladek	Phone:	239-1588

Site Compliance History Components

1. Has the site been in existence and/or operation for the full five year compliance period? Yes
2. Has there been a (known) change in ownership of the site during the compliance period? No
3. If Yes, who is the current owner? N/A
4. If Yes, who was/were the prior owner(s)? N/A
5. When did the change(s) in ownership occur? N/A

Components (Multimedia) for the Site :

- A. Final Enforcement Orders, court judgements, and consent decrees of the state of Texas and the federal government.

N/A

- B. Any criminal convictions of the state of Texas and the federal government.

N/A

- C. Chronic excessive emissions events.

N/A

- D. The approval dates of investigations. (CCEDS Inv. Track. No.)

N/A	1	10/25/2002	(14617)
	2	06/12/2002	(93352)
	3	07/23/2002	(3227)
	4	07/27/2001	(134527)
	5	03/21/2000	(30141)
	6	07/23/2002	(3583)
	7	09/07/2000	(145711)
	8	12/06/2002	(18095)
	9	03/21/2000	(119582)
	10	07/16/2004	(269681)
	11	08/12/2004	(285912)
	12	08/15/2003	(148958)

- E. Written notices of violations (NOV). (CCEDS Inv. Track. No.)

Date: 07/22/2002 (3583)

Classification: Minor

Self Report? NO

Citation: 30 TAC Chapter 335, SubChapter F 335.152(a)(19)

Description: Failure to determine the maximum organic vapor pressure of the spent mineral spirits.

Classification: Minor

Self Report? NO

Citation: 30 TAC Chapter 335, SubChapter F 335.152(a)(19)

Description: Failure to maintain documentation that the conservation vent installed on the storage tank is designed with no detectable emissions when secured in the closed position. In addition, the internal pressure operating range of the storage tank and wet dumpster was not determined

Date: 07/22/2002 (3227)

Classification: Minor

Self Report? NO

Citation: 30 TAC Chapter 335, SubChapter F 335.152(a)(18)

Description: Failure to assign numbers to all equipment subjected to subpart BB requirements.

Classification: Minor

Self Report? NO

Citation: 30 TAC Chapter 335, SubChapter F 335.152(a)(18)

Description: Failure to determine the vapor pressure of the spent mineral spirits managed at the Abilene branch:

F. Environmental audits.

N/A

G. Type of environmental management systems (EMSs):

N/A

H. Voluntary on-site compliance assessment dates.

N/A

I. Participation in a voluntary pollution reduction program.

N/A

J. Early compliance.

N/A

Sites Outside of Texas

N/A

Compliance History

Customer/Respondent/Owner-Operator:	CN600128128 Safety-Kleen Systems, Inc.	Classification: AVERAGE	Rating: 1.64
Regulated Entity:	RN100548791 SAFETY KLEEN SYSTEMS	Classification: HIGH	Site Rating:
ID Number(s):	INDUSTRIAL AND HAZARDOUS WASTE GENERATION	PERMIT	50223
	INDUSTRIAL AND HAZARDOUS WASTE GENERATION	EPA ID	TXD000747378
	INDUSTRIAL AND HAZARDOUS WASTE GENERATION	SOLID WASTE REGISTRATION # (SWR)	67028
	USED OIL	REGISTRATION	A85233
	USED OIL	REGISTRATION	A85233
	STORMWATER	PERMIT	TXR05K200
	AIR NEW SOURCE PERMITS	PERMIT	51251
	MUNICIPAL SOLID WASTE PROCESSING	REGISTRATION	40139
	MUNICIPAL SOLID WASTE PROCESSING	REGISTRATION	40149
Location:	202 MICHAEL ST, LONGVIEW, TX, 75603		Rating Date: 9/1/2004 Repeat Violator: NO
TCEQ Region:	REGION 05 - TYLER		
Date Compliance History Prepared:	July 26, 2005		
Agency Decision Requiring Compliance History:	Permit - Issuance, renewal, amendment, modification, denial, suspension, or revocation of a permit.		
Compliance Period:	March 08, 1999 to July 26, 2005		
TCEQ Staff Member to Contact for Additional Information Regarding this Compliance History			
Name:	Kimberly Sladek	Phone:	239-1588

Site Compliance History Components

- | | |
|--|-----|
| 1. Has the site been in existence and/or operation for the full five year compliance period? | Yes |
| 2. Has there been a (known) change in ownership of the site during the compliance period? | No |
| 3. If Yes, who is the current owner? | N/A |
| 4. If Yes, who was/were the prior owner(s)? | N/A |
| 5. When did the change(s) in ownership occur? | N/A |

Components (Multimedia) for the Site :

- A. Final Enforcement Orders, court judgements, and consent decrees of the state of Texas and the federal government.
N/A
- B. Any criminal convictions of the state of Texas and the federal government.
N/A
- C. Chronic excessive emissions events.
N/A
- D. The approval dates of investigations. (CCEDS Inv. Track. No.)
- | | | | |
|-----|---|------------|----------|
| N/A | 1 | 08/05/2003 | (18707) |
| | 2 | 09/07/2000 | (145236) |
| | 3 | 05/27/2004 | (269679) |
| | 4 | 04/13/2004 | (267730) |
- E. Written notices of violations (NOV). (CCEDS Inv. Track. No.)
N/A
- F. Environmental audits.
N/A
- G. Type of environmental management systems (EMSs).
N/A
- H. Voluntary on-site compliance assessment dates.
N/A
- I. Participation in a voluntary pollution reduction program.

N/A

J. Early compliance.

N/A

Sites Outside of Texas

N/A

Compliance History

Customer/Respondent/Owner-Operator:	CN600128128 Safety-Kleen Systems, Inc.	Classification: AVERAGE	Rating: 1.64
Regulated Entity:	RN100550987 SAFETY-KLEEN WICHITA FALLS	Classification: HIGH	Site Rating
ID Number(s):	INDUSTRIAL AND HAZARDOUS WASTE GENERATION	PERMIT	50232
	INDUSTRIAL AND HAZARDOUS WASTE GENERATION	EPA ID	TXD000747428
	INDUSTRIAL AND HAZARDOUS WASTE GENERATION	SOLID WASTE REGISTRATION # (SWR)	64041
	AIR NEW SOURCE PERMITS	ACCOUNT NUMBER	WH0113P
	AIR NEW SOURCE PERMITS	PERMIT	50467
	USED OIL	REGISTRATION	A85241
	USED OIL	REGISTRATION	A85241
	STORMWATER	PERMIT	TXRNEP694
Location:	1606 MISSILE RD, WICHITA FALLS, TX, 76306		Rating Date: 9/1/2004 Repeat Violator: NO
TCEQ Region:	REGION 03 - ABILENE		
Date Compliance History Prepared:	July 26, 2005		
Agency Decision Requiring Compliance History:	Permit - Issuance, renewal, amendment, modification, denial, suspension, or revocation of a permit.		
Compliance Period:	March 08, 1999 to July 26, 2005		

TCEQ Staff Member to Contact for Additional Information Regarding this Compliance History

Name: Kimberly Sladek Phone: 239-1588

Site Compliance History Components

- | | |
|--|-----|
| 1. Has the site been in existence and/or operation for the full five year compliance period? | Yes |
| 2. Has there been a (known) change in ownership of the site during the compliance period? | No |
| 3. If Yes, who is the current owner? | N/A |
| 4. If Yes, who was/were the prior owner(s)? | N/A |
| 5. When did the change(s) in ownership occur? | N/A |

Components (Multimedia) for the Site :

- A. Final Enforcement Orders, court judgements, and consent decrees of the state of Texas and the federal government.
N/A
- B. Any criminal convictions of the state of Texas and the federal government.
 N/A
- C. Chronic excessive emissions events.
 N/A
- D. The approval dates of investigations. (CCEDS Inv. Track. No.)
- | | | | |
|-----|---|------------|----------|
| N/A | 1 | 04/28/2000 | (30140) |
| | 2 | 07/16/2004 | (269694) |
| | 3 | 12/03/2002 | (7214) |
| | 4 | 05/02/2000 | (119584) |
| | 5 | 05/02/2000 | (119583) |
| | 6 | 10/02/2002 | (12954) |
| | 7 | 04/14/2003 | (33390) |
| | 8 | 09/07/2000 | (146230) |
| | 9 | 08/11/2004 | (285018) |
- E. Written notices of violations (NOV). (CCEDS Inv. Track. No.)
 N/A
- F. Environmental audits.
 N/A
- G. Type of environmental management systems (EMSs).

N/A

H. Voluntary on-site compliance assessment dates.

N/A

I. Participation in a voluntary pollution reduction program.

N/A

J. Early compliance.

N/A

Sites Outside of Texas

N/A

Compliance History

Customer/Respondent/Owner-Operator:	CN600128128 Safety-Kleen Systems, Inc.	Classification: AVERAGE	Rating: 1.64
Regulated Entity:	RN100591197 SAFETY KLEEN SYSTEMS	Classification: HIGH	Site Rating:
ID Number(s):	INDUSTRIAL AND HAZARDOUS WASTE GENERATION	PERMIT	50260
	INDUSTRIAL AND HAZARDOUS WASTE GENERATION	EPA ID	TXD000747386
	INDUSTRIAL AND HAZARDOUS WASTE GENERATION	SOLID WASTE REGISTRATION # (SWR)	71143
	AIR NEW SOURCE PERMITS	PERMIT	23945
	AIR NEW SOURCE PERMITS	ACCOUNT NUMBER	HG9603J
	USED OIL	REGISTRATION	A85172
	USED OIL	REGISTRATION	A85172
	STORMWATER	PERMIT	TXRNEP456
	INDUSTRIAL AND HAZARDOUS WASTE COMPLIANCE PLANS	PERMIT	50260
	IHW CORRECTIVE ACTION	SOLID WASTE REGISTRATION # (SWR)	71143
Location:	3333 FEDERAL RD, PASADENA, TX, 77504		Rating Date: 9/1/2004 Repeat Violator: NO
TCEQ Region:	REGION 12 - HOUSTON		
Date Compliance History Prepared:	July 26, 2005		
Agency Decision Requiring Compliance History:	Permit - Issuance, renewal, amendment, modification, denial, suspension, or revocation of a permit.		
Compliance Period:	March 08, 1999 to July 26, 2005		

TCEQ Staff Member to Contact for Additional Information Regarding this Compliance History

Name: Kimberly Sladek Phone: 239-1588

Site Compliance History Components

1. Has the site been in existence and/or operation for the full five year compliance period? Yes
2. Has there been a (known) change in ownership of the site during the compliance period? Yes
3. If Yes, who is the current owner?

Safety-Kleen Systems, Inc.
Safety-Kleen (Altair), Inc.
Safety-Kleen Systems, Inc.
N/A
N/A
4. If Yes, who was/were the prior owner(s)?
5. When did the change(s) in ownership occur?

N/A

Components (Multimedia) for the Site :

- A. Final Enforcement Orders, court judgements, and consent decrees of the state of Texas and the federal government.

N/A

- B. Any criminal convictions of the state of Texas and the federal government.

N/A

- C. Chronic excessive emissions events.

N/A

- D. The approval dates of investigations. (CCEDS Inv. Track. No.)

N/A	1	08/08/2000	(30696)
	2	07/05/2000	(30695)
	3	09/07/2000	(145793)
	4	06/03/2004	(112980)
- E. Written notices of violations (NOV). (CCEDS Inv. Track. No.)

N/A

- F. Environmental audits.

N/A

- G. Type of environmental management systems (EMSs).

N/A

H. Voluntary on-site compliance assessment dates.

N/A

I. Participation in a voluntary pollution reduction program.

N/A

J. Early compliance.

N/A

Sites Outside of Texas

N/A

Compliance History

Customer/Respondent/Owner-Operator:	CN600128128	Safety-Kleen Systems, Inc.	Classification: AVERAGE	Rating: 1.64
Regulated Entity:	RN100599968	BLUE FLASH EXPRESS	Classification: AVERAGE BY DEFAULT	Site Rating: 2.24
ID Number(s):	STORMWATER	PERMIT	TXR05K803	
Location:	1802 S M ST, LA PORTE, TX, 77571		Rating Date: 9/1/2004 Repeat Violator: NO	
TCEQ Region:	REGION 12 - HOUSTON			
Date Compliance History Prepared:	July 26, 2005			
Agency Decision Requiring Compliance History:	Permit - Issuance, renewal, amendment, modification, denial, suspension, or revocation of a permit.			
Compliance Period:	March 08, 1999 to July 26, 2005			
TCEQ Staff Member to Contact for Additional Information Regarding this Compliance History				
Name:	Kimberly Sladek		Phone:	239-1588

Site Compliance History Components

1. Has the site been in existence and/or operation for the full five year compliance period? Yes
2. Has there been a (known) change in ownership of the site during the compliance period? Yes
3. If Yes, who is the current owner?

Safety-Kleen Systems, Inc.
Blue Flash Express, L. L. C.
N/A
N/A
4. If Yes, who was/were the prior owner(s)? N/A
5. When did the change(s) in ownership occur? N/A

Components (Multimedia) for the Site :

- A. Final Enforcement Orders, court judgements, and consent decrees of the state of Texas and the federal government.

N/A

 - B. Any criminal convictions of the state of Texas and the federal government.

N/A

 - C. Chronic excessive emissions events.

N/A

 - D. The approval dates of investigations. (CCEDS Inv. Track. No.)

N/A

 - E. Written notices of violations (NOV). (CCEDS Inv. Track. No.)

N/A

 - F. Environmental audits.

N/A

 - G. Type of environmental management systems (EMSs).

N/A

 - H. Voluntary on-site compliance assessment dates.

N/A

 - I. Participation in a voluntary pollution reduction program.

N/A

 - J. Early compliance.

N/A

- Sites Outside of Texas
- | |
|-----|
| N/A |
|-----|

Compliance History

Customer/Respondent/Owner-Operator:	CN600128128 Safety-Kleen Systems, Inc.	Classification: AVERAGE	Rating: 1.64
Registered Entity:	RN100626175 SAFETY KLEEN WACO 2	Classification: AVERAGE BY DEFAULT	Site Rating: 3.01
ID Number(s):	MUNICIPAL SOLID WASTE PROCESSING REGISTRATION		40140
Location:	22006 WOODWAY DR, WOODWAY, TX, 76712	Rating Date: 9/1/2004	Repeat Violator: NO
TCEQ Region:	REGION 09 - WACO		
Date Compliance History Prepared:	July 26, 2005		
Agency Decision Requiring Compliance History:	Permit - Issuance, renewal, amendment, modification, denial, suspension, or revocation of a permit.		
Compliance Period:	March 08, 1999 to July 26, 2005.		

TCEQ Staff Member to Contact for Additional Information Regarding this Compliance History

Name: Kimberly Sladek Phone: 239-1588

Site Compliance History Components

- | | |
|--|-----------------------------------|
| 1. Has the site been in existence and/or operation for the full five year compliance period? | Yes |
| 2. Has there been a (known) change in ownership of the site during the compliance period? | Yes |
| 3. If Yes, who is the current owner? | <u>Safety-Kleen Systems, Inc.</u> |
| 4. If Yes, who was/were the prior owner(s)? | <u>N/A</u> |
| 5. When did the change(s) in ownership occur? | <u>N/A</u> |

Components (Multimedia) for the Site :

- A. Final Enforcement Orders, court judgements, and consent decrees of the state of Texas and the federal government.
N/A
 - B. Any criminal convictions of the state of Texas and the federal government.
N/A
 - C. Chronic excessive emissions events.
N/A
 - D. The approval dates of investigations. (CCEDS Inv. Track. No.)
N/A 1 05/06/2005 (379375)
 - E. Written notices of violations (NOV). (CCEDS Inv. Track. No.)
N/A
 - F. Environmental audits.
N/A
 - G. Type of environmental management systems (EMSs).
N/A
 - H. Voluntary on-site compliance assessment dates.
N/A
 - J. Participation in a voluntary pollution reduction program.
N/A
 - J. Early compliance.
N/A
- Sites Outside of Texas
N/A

Compliance History

Customer/Respondent/Owner-Operator:	CN600128128 Safety-Kleen Systems, Inc.	Classification: AVERAGE	Rating: 1.64
Regulated Entity:	RN100699511 SAFETY-KLEEN SYSTEMS	Classification: HIGH	Site Rating:
ID Number(s):	INDUSTRIAL AND HAZARDOUS WASTE GENERATION	PERMIT	50234
	INDUSTRIAL AND HAZARDOUS WASTE GENERATION	EPA ID	TXD083145656
	INDUSTRIAL AND HAZARDOUS WASTE GENERATION	SOLID WASTE REGISTRATION # (SWR)	68062
	AIR NEW SOURCE PERMITS	ACCOUNT NUMBER	HN0251J
	AIR NEW SOURCE PERMITS	PERMIT	51252
	USED OIL	REGISTRATION	A85164
	USED OIL	REGISTRATION	A85164
	IHW CORRECTIVE ACTION	SOLID WASTE REGISTRATION # (SWR)	68062
Location:	1311 E TAMARACK AVE, MCALLEN, TX, 78501		Rating Date: 9/1/2004 Repeat Violator: NO
TCEQ Region:	REGION 15 - HARLINGEN		
Date Compliance History Prepared:	July 26, 2005		
Agency Decision Requiring Compliance History:	Permit - Issuance, renewal, amendment, modification, denial, suspension, or revocation of a permit.		
Compliance Period:	March 08, 1999 to July 26, 2005		

TCEQ Staff Member to Contact for Additional Information Regarding this Compliance History

Name: Kimberly Sladek Phone: 239-1588

Site Compliance History Components

1. Has the site been in existence and/or operation for the full five year compliance period? Yes
2. Has there been a (known) change in ownership of the site during the compliance period? Yes
3. If Yes, who is the current owner? Safety-Kleen Systems, Inc.
4. If Yes, who was/were the prior owner(s)? N/A
5. When did the change(s) in ownership occur? N/A

Components (Multimedia) for the Site :

- A. Final Enforcement Orders, court judgements, and consent decrees of the state of Texas and the federal government.

N/A
- B. Any criminal convictions of the state of Texas and the federal government.

N/A
- C. Chronic excessive emissions events.

N/A
- D. The approval dates of investigations. (CCEDS Inv. Track. No.)

N/A	1	08/08/2000	(113486)
	2	10/30/2002	(15093)
	3	07/27/2004	(267304)
	4	07/09/2003	(126903)
	5	08/21/2002	(8042)
	6	08/19/2000	(30946)
	7	05/31/2005	(394157)
	8	08/21/2003	(151246)
	9	08/21/2002	(8403)
	10	08/15/2000	(83122)
	11	09/07/2000	(145590)

E. Written notices of violations (NOV), (CCEDS Inv. Track. No.)

Date: 05/27/2005 (394157)

Self Report? NO

Classification: Minor

Citation:

30 TAC Chapter 335, SubChapter A 335.10(b)[G]
30 TAC Chapter 335, SubChapter A 335.10(d)(1)
40 CFR Chapter 262, SubChapter I, PT 262, SubPT B 262.20(a)
40 CFR Chapter 262, SubChapter I, PT 262, SubPT B 262.23(a)

Description: Failure to properly complete a manifest when shipping hazardous or class 1 waste off-site, 30 TAC 335.10(b).

F. Environmental audits.

N/A

G. Type of environmental management systems (EMSs).

N/A

H. Voluntary on-site compliance assessment dates:

N/A

I. Participation in a voluntary pollution reduction program.

N/A

J. Early compliance.

N/A

Sites Outside of Texas

N/A

Compliance History

Customer/Respondent/Owner-Operator:	CN600128128 Safety-Kleen Systems, Inc.	Classification: AVERAGE	Rating: 1.64
Regulated Entity:	RN100703578 DISPOSAL PROPERTIES	Classification: HIGH	Site Rating: 7
ID Number(s):	INDUSTRIAL AND HAZARDOUS WASTE GENERATION	PERMIT	50246
	INDUSTRIAL AND HAZARDOUS WASTE GENERATION	EPA ID	TXD000729400
	INDUSTRIAL AND HAZARDOUS WASTE GENERATION	SOLID WASTE REGISTRATION # (SWR)	69048
	AIR NEW SOURCE PERMITS	ACCOUNT NUMBER	BG1311W
	AIR NEW SOURCE PERMITS	PERMIT	50773
	USED OIL	REGISTRATION	A85165
	USED OIL	REGISTRATION	A85165
	STORMWATER	PERMIT	TXR05K194
Location:	5243 SINCLAIR RD, SAN ANTONIO, TX, 78222		Rating Date: 9/1/2004 Repeat Violator: NO
TCEQ Region:	REGION 13 - SAN ANTONIO		
Date Compliance History Prepared:	July 26, 2005		
Agency Decision Requiring Compliance History:	Permit - Issuance, renewal, amendment, modification, denial, suspension, or revocation of a permit.		
Compliance Period:	March 08, 1999 to July 26, 2005		

TCEQ Staff Member to Contact for Additional Information Regarding this Compliance History

Name: Kimberly Sladek Phone: 239-1588

Site Compliance History Components

1. Has the site been in existence and/or operation for the full five year compliance period? Yes
2. Has there been a (known) change in ownership of the site during the compliance period? Yes
3. If Yes, who is the current owner?

Safety-Kleen Systems, Inc.
Safety-Kleen Systems, Inc.
4. If Yes, who was/were the prior owner(s)? N/A
5. When did the change(s) in ownership occur? N/A

Components (Multimedia) for the Site :

- A. Final Enforcement Orders, court judgements, and consent decrees of the state of Texas and the federal government.

N/A

- B. Any criminal convictions of the state of Texas and the federal government.

N/A

- C. Chronic excessive emissions events.

N/A

- D. The approval dates of investigations. (CCEDS Inv. Track. No.)

N/A	1	05/03/2002	(66901)
	2	05/03/2002	(97337)
	3	09/07/2000	(146002)
	4	11/19/2003	(248955)
- E. Written notices of violations (NOV). (CCEDS Inv. Track. No.)

N/A

- F. Environmental audits.

N/A

- G. Type of environmental management systems (EMSs).

N/A

- H. Voluntary on-site compliance assessment dates.

N/A

- I. Participation in a voluntary pollution reduction program.

N/A

J. Early compliance.

N/A

Sites Outside of Texas

N/A

Compliance History

Customer/Respondent/Owner-Operator:	CN600128128 Safety-Kleen Systems, Inc.	Classification: AVERAGE	Rating: 1.64
Regulated Entity:	RN100703677 SAFETY-KLEEN SYSTEMS FORT WORTH	Classification: HIGH	Site Rating: 0.00
ID Number(s):	INDUSTRIAL AND HAZARDOUS WASTE GENERATION	PERMIT	50228
	INDUSTRIAL AND HAZARDOUS WASTE GENERATION	EPA ID	TXD981053416
	INDUSTRIAL AND HAZARDOUS WASTE GENERATION	SOLID WASTE REGISTRATION # (SWR)	55195
	AIR NEW SOURCE PERMITS	ACCOUNT NUMBER	TA1309C
	AIR NEW SOURCE PERMITS	PERMIT	50469
	AIR NEW SOURCE PERMITS	ACCOUNT NUMBER	TA1309C
	USED OIL	REGISTRATION	A85174
	USED OIL	REGISTRATION	A85174
	SLUDGE	REGISTRATION	22459
Location:	6529 MIDWAY RD, FORT WORTH, TX, 76117		Rating Date: 9/1/2004 Repeat Violator: NO
TCEQ Region:	REGION 04 - DFW METROPLEX		
Date Compliance History Prepared:	July 26, 2005		
Agency Decision Requiring Compliance History:	Permit - issuance, renewal, amendment, modification, denial, suspension, or revocation of a permit.		
Compliance Period:	March 08, 1999 to July 26, 2005		

TCEQ Staff Member to Contact for Additional Information Regarding this Compliance History

Name: Kimberly Sladok Phone: 239-1588

Site Compliance History Components

1. Has the site been in existence and/or operation for the full five year compliance period? Yes
2. Has there been a (known) change in ownership of the site during the compliance period? Yes
3. If Yes, who is the current owner? Safety-Kleen Systems, Inc.
4. If Yes, who was/were the prior owner(s)? N/A
5. When did the change(s) in ownership occur? N/A

Components (Multimedia) for the Site :

- A. Final Enforcement Orders, court judgements, and consent decrees of the state of Texas and the federal government. N/A
- B. Any criminal convictions of the state of Texas and the federal government. N/A
- C. Chronic excessive emissions events. N/A
- D. The approval dates of investigations. (CCEDS Inv. Track. No.) N/A 1 09/07/2000 (145880)
- E. Written notices of violations (NOV). (CCEDS Inv. Track. No.) N/A
- F. Environmental audits. N/A
- G. Type of environmental management systems (EMSs). N/A
- H. Voluntary on-site compliance assessment dates. N/A
- I. Participation in a voluntary pollution reduction program. N/A
- J. Early compliance.

N/A

Sites Outside of Texas

N/A

Compliance History

Customer/Respondent/Owner-Operator:	CN600128128 Safety-Kleen Systems, Inc.	Classification: AVERAGE	Rating: 1.64
Regulated Entity:	RN100704030 SAFETY-KLEEN SYSTEMS IRVING	Classification: HIGH	Site Rating:
ID Number(s):	INDUSTRIAL AND HAZARDOUS WASTE GENERATION	PERMIT	50218
	INDUSTRIAL AND HAZARDOUS WASTE GENERATION	EPA ID	TXD981052061
	INDUSTRIAL AND HAZARDOUS WASTE GENERATION	SOLID WASTE REGISTRATION # (SWR)	55194
	AIR NEW SOURCE PERMITS	PERMIT	50470
	AIR NEW SOURCE PERMITS	ACCOUNT NUMBER	DB2049D
	PETROLEUM STORAGE TANK REGISTRATION	REGISTRATION	33642
	USED OIL	REGISTRATION	A85171
	USED OIL	EPA ID	TXD981052061
	USED OIL	REGISTRATION	A85171
	STORMWATER	PERMIT	TXR05K551
	IHW CORRECTIVE ACTION	SOLID WASTE REGISTRATION # (SWR)	55194
Location:	2130 E GRAUWYLER RD, IRVING, TX, 75061	Rating Date: 9/1/2004	Repeat Violator: NO
TCEQ Region:	REGION 04 - DFW METROPLEX		
Date Compliance History Prepared:	July 26, 2005		
Agency Decision Requiring Compliance History:	Permit - Issuance, renewal, amendment, modification, denial, suspension, or revocation of a permit.		
Compliance Period:	March 08, 1999 to July 26, 2005		

TCEQ Staff Member to Contact for Additional Information Regarding this Compliance History

Name: Kimberly Sladek Phone: 239-1588

Site Compliance History Components

- | | |
|--|----------------------------|
| 1. Has the site been in existence and/or operation for the full five year compliance period? | Yes |
| 2. Has there been a (known) change in ownership of the site during the compliance period? | Yes |
| 3. If Yes, who is the current owner? | Safety-Kleen Systems, Inc. |
| 4. If Yes, who was/were the prior owner(s)? | N/A |
| 5. When did the change(s) in ownership occur? | N/A |

Components (Multimedia) for the Site :

- | | | | | | | | | | | |
|-----|---|---|----------|---|------------|---------|--|---|------------|----------|
| A. | Final Enforcement Orders, court judgements, and consent decrees of the state of Texas and the federal government. | N/A | | | | | | | | |
| B. | Any criminal convictions of the state of Texas and the federal government. | N/A | | | | | | | | |
| C. | Chronic excessive emissions events. | N/A | | | | | | | | |
| D. | The approval dates of investigations. (CCEDS Inv. Track. No.) | <table style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 5%; border-right: 1px solid black;">N/A</td> <td style="width: 15%;">1</td> <td style="width: 20%;">07/29/2003</td> <td style="width: 20%;">(31341)</td> </tr> <tr> <td style="border-right: 1px solid black;"></td> <td>2</td> <td>09/07/2000</td> <td>(145940)</td> </tr> </table> | N/A | 1 | 07/29/2003 | (31341) | | 2 | 09/07/2000 | (145940) |
| N/A | 1 | 07/29/2003 | (31341) | | | | | | | |
| | 2 | 09/07/2000 | (145940) | | | | | | | |
| E. | Written notices of violations (NOV). (CCEDS Inv. Track. No.) | N/A | | | | | | | | |
| F. | Environmental audits. | N/A | | | | | | | | |
| G. | Type of environmental management systems (EMSs). | N/A | | | | | | | | |
| H. | Voluntary on-site compliance assessment dates. | N/A | | | | | | | | |

I. Participation in a voluntary pollution reduction program.

N/A

✓ Early compliance.

N/A

Sites Outside of Texas

N/A

Compliance History

Customer/Respondent/Owner-Operator:	CN600128128 Safety-Kleen Systems, Inc.	Classification: AVERAGE	Rating: 1.64
Regulated Entity:	RN100717123 SAFETY KLEEN CORP LUBBOCK	Classification: HIGH	Site Rating:
ID Number(s):	USED OIL	REGISTRATION	A85169
	USED OIL	REGISTRATION	A85169
	STORMWATER	PERMIT	TXRNEP615
Location:	1301 N REDWOOD AVE, LUBBOCK, TX, 79403	Rating Date: 9/1/2004 Repeat Violator: NO	
TCEQ Region:	REGION 02 - LUBBOCK		
Date Compliance History Prepared:	July 26, 2005		
Agency Decision Requiring Compliance History:	Permit - Issuance, renewal, amendment, modification, denial, suspension, or revocation of a permit.		
Compliance Period:	March 08, 1999 to July 26, 2005		

TCEQ Staff Member to Contact for Additional Information Regarding this Compliance History

Name: Kimberly Sladek Phone: 239-1588

Site Compliance History Components

- | | |
|--|----------------------------|
| 1. Has the site been in existence and/or operation for the full five year compliance period? | Yes |
| 2. Has there been a (known) change in ownership of the site during the compliance period? | Yes |
| 3. If Yes, who is the current owner? | Safety-Kleen Systems, Inc. |
| 4. If Yes, who was/were the prior owner(s)? | N/A |
| 5. When did the change(s) in ownership occur? | N/A |

Components (Multimedia) for the Site :

- A. Final Enforcement Orders, court judgments, and consent decrees of the state of Texas and the federal government.

N/A

- B. Any criminal convictions of the state of Texas and the federal government.

N/A

- C. Chronic excessive emissions events.

N/A

- D. The approval dates of investigations. (CCEDS Inv. Track. No.)

N/A	1	09/07/2000	(145219)
	2	04/17/2000	(30097)
	3	08/07/2002	(6062)

- E. Written notices of violations (NOV). (CCEDS Inv. Track. No.)

N/A

- F. Environmental audits.

N/A

- G. Type of environmental management systems (EMSs).

N/A

- H. Voluntary on-site compliance assessment dates.

N/A

- I. Participation in a voluntary pollution reduction program.

N/A

- J. Early compliance.

N/A

- Sites Outside of Texas

N/A

Compliance History

Customer/Respondent/Owner-Operator:	CN600128128	Safety-Kleen Systems, Inc.	Classification: AVERAGE	Rating: 1.64
Registered Entity:	RN100717248	SAFETY KLEEN	Classification: AVERAGE BY DEFAULT	Site Rating: 3.01
ID Number(s):	INDUSTRIAL AND HAZARDOUS WASTE TRANSPORTATION	EPA ID	OHD980587364	
	INDUSTRIAL AND HAZARDOUS WASTE TRANSPORTATION	SOLID WASTE REGISTRATION # (SWR)	40882	
Location:	581 MILLIKEN DR, HEBRON, OH, 43025		Rating Date: 9/1/2004 Repeat Violator: NO	
TCEQ Region:	REGION 05 - TYLER			
Date Compliance History Prepared:	July 26, 2005			
Agency Decision Requiring Compliance History:	Permit - Issuance, renewal, amendment, modification, denial, suspension, or revocation of a permit.			
Compliance Period:	March 08, 1999 to July 26, 2005			
TCEQ Staff Member to Contact for Additional Information Regarding this Compliance History				
Name:	Kimberly Sladek	Phone:	239-1588	

Site Compliance History Components

- | | |
|--|----------------------------|
| 1. Has the site been in existence and/or operation for the full five year compliance period? | Yes |
| 2. Has there been a (known) change in ownership of the site during the compliance period? | Yes |
| 3. If Yes, who is the current owner? | Safety-Kleen Systems, Inc. |
| 4. If Yes, who was/were the prior owner(s)? | N/A |
| 5. When did the change(s) in ownership occur? | N/A |

Components (Multimedia) for the Site :

- | | | |
|----|---|--|
| A. | Final Enforcement Orders, court judgements, and consent decrees of the state of Texas and the federal government. | |
| | N/A | |
| B. | Any criminal convictions of the state of Texas and the federal government. | |
| | N/A | |
| C. | Chronic excessive emissions events. | |
| | N/A | |
| D. | The approval dates of investigations. (CCEDS Inv. Track. No.) | |
| | N/A | |
| E. | Written notices of violations (NOV). (CCEDS Inv. Track. No.) | |
| | N/A | |
| F. | Environmental audits. | |
| | N/A | |
| G. | Type of environmental management systems (EMSs). | |
| | N/A | |
| H. | Voluntary on-site compliance assessment dates. | |
| | N/A | |
| I. | Participation in a voluntary pollution reduction program. | |
| | N/A | |
| J. | Early compliance. | |
| | N/A | |
| S. | Outside of Texas | |
| | N/A | |

Compliance History

Customer/Respondent/Owner-Operator:	CN600128128 Safety-Kleen Systems, Inc.	Classification: AVERAGE	Rating: 1.64
Regulated Entity:	RN100717370 SAFETY KLEEN	Classification: AVERAGE BY DEFAULT	Site Rating: 2.01
ID Number(s):	INDUSTRIAL AND HAZARDOUS WASTE TRANSPORTATION	EPA ID	LAD98105744
	INDUSTRIAL AND HAZARDOUS WASTE TRANSPORTATION	SOLID WASTE REGISTRATION# (SWR)	41490
Location:	518 RYDER DR, PINEVILLE, LA, 71360		Rating Date: 9/1/2004 Repeat Violator: NO
TCEQ Region:	REGION 05 - TYLER		
Date Compliance History Prepared:	July 26, 2005		
Agency Decision Requiring Compliance History:	Permit - Issuance, renewal, amendment, modification, denial, suspension, or revocation of a permit.		
Compliance Period:	March 08, 1999 to July 26, 2005		

TCEQ Staff Member to Contact for Additional Information Regarding this Compliance History

Name: Kimberly Sladek Phone: 239-1588

Site Compliance History Components

1. Has the site been in existence and/or operation for the full five year compliance period? Yes
2. Has there been a (known) change in ownership of the site during the compliance period? Yes
3. If Yes, who is the current owner? Safety-Kleen Systems, Inc.
4. If Yes, who was/were the prior owner(s)? N/A
5. When did the change(s) in ownership occur? N/A

Components (Multimedia) for the Site :

- A. Final Enforcement Orders, court judgements, and consent decrees of the state of Texas and the federal government.
N/A
 - B. Any criminal convictions of the state of Texas and the federal government.
N/A
 - C. Chronic excessive emissions events.
N/A
 - D. The approval dates of investigations. (CCEDS Inv. Track. No.)
N/A
 - E. Written notices of violations (NOV). (CCEDS Inv. Track. No.)
N/A
 - F. Environmental audits.
N/A
 - G. Type of environmental management systems (EMSs).
N/A
 - H. Voluntary on-site compliance assessment dates.
N/A
 - I. Participation in a voluntary pollution reduction program.
N/A
 - J. Early compliance.
N/A
- Sites Outside of Texas
N/A

Compliance History

Customer/Respondent/Owner-Operator:	CN600128128 Safety-Kleen Systems, Inc.	Classification: AVERAGE	Rating: 1.64
ated Entity:	RN100717677 SAFETY-KLEEN MISSOURI CITY 6 073 02	Classification: AVERAGE	Site Rating: 3.00
ID Number(s):	INDUSTRIAL AND HAZARDOUS WASTE PERMIT		50236
	GENERATION		
	INDUSTRIAL AND HAZARDOUS WASTE PERMIT		TXD010803203
	GENERATION		
	INDUSTRIAL AND HAZARDOUS WASTE PERMIT		71144
	GENERATION		
	AIR NEW SOURCE PERMITS ACCOUNT NUMBER		FG0176M
	AIR NEW SOURCE PERMITS PERMIT		51253
	USED OIL REGISTRATION		A85239
	USED OIL REGISTRATION		A85239
	STORMWATER PERMIT		TXR05K198
	INDUSTRIAL AND HAZARDOUS WASTE PERMIT		50236
	COMPLIANCE PLANS		
	IHW CORRECTIVE ACTION		71144
	INDUSTRIAL AND HAZARDOUS WASTE PERMIT		50236
	POST CLOSURE		
Location:	1580 INDUSTRIAL DR, MISSOURI CITY, TX, 77489		Rating Date: 9/1/2004 Repeat Violator: NO
TCEQ Region:	REGION 12 - HOUSTON		
Date Compliance History Prepared:	July 26, 2005		
Agency Decision Requiring Compliance History:	Permit - Issuance, renewal, amendment, modification, denial, suspension, or revocation of a permit.		
Compliance Period:	March 08, 1999 to July 26, 2005		

TCEQ Staff Member to Contact for Additional Information Regarding this Compliance History

Name: Kimberly Sladek Phone: 239-1588

Site Compliance History Components

1. Has the site been in existence and/or operation for the full five year compliance period? Yes
2. Has there been a (known) change in ownership of the site during the compliance period? Yes
3. If Yes, who is the current owner? Safety-Kleen Systems, Inc.
4. If Yes, who was/were the prior owner(s)? N/A
5. When did the change(s) in ownership occur? N/A

Components (Multimedia) for the Site:

- A. Final Enforcement Orders, court judgements, and consent decrees of the state of Texas and the federal government.

N/A
- B. Any criminal convictions of the state of Texas and the federal government.

N/A
- C. Chronic excessive emissions events.

N/A
- D. The approval dates of investigations. (CCEDS Inv. Track. No.)

N/A	1	08/07/2002	(7503)
	2	06/27/2003	(61838)
	3	07/23/2003	(112845)
	4	06/15/2004	(253592)
	5	09/07/2000	(145840)
	6	12/16/2004	(342536)

E. Written notices of violations (NOV). (CCEDS Inv. Track. No.)

Date: 06/27/2003 (61838)

Classification: Moderate

Self Report? NO

Citation: 30 TAC Chapter 335, SubChapter A 335.10(b)(22)

Description: A number of manifests reviewed during the investigation did not contain the TCEQ waste classification code assigned to the waste by the generator.

Date: 07/23/2003 (112845)

Self Report? NO

Classification: Moderate

Rqmt Prov: PERMIT IA

Description: Wells shall be sampled according to the Sampling and Analysis Plan (SAP). The sampling crew was unaware of a SAP. The facility records did not contain a SAP at the time of the investigation.

Self Report? NO

Classification: Moderate

Rqmt Prov: PERMIT IA

Description: Compliance Plan No. CP-50236 Provision V.A,1,2, and 4. Performance Standard

Self Report? NO

Classification: Moderate

Rqmt Prov: PERMIT IA

Description: Compliance Plan No. CP-50236 Provision III.E.2, referencing Attachment B, No. 13, Well Construction

Self Report? NO

Classification: Moderate

Rqmt Prov: PERMIT IA

Description: The permittee is authorized to manage wastes listed in Permit Table IV.B. During the current sampling event evacuated groundwater was poured in the facility's drum washing system. Contaminated groundwater is not on the listed on the referenced table.

Self Report? NO

Classification: Moderate

Rqmt Prov: PERMIT IA

Description: Field observations including descriptions of the appearance (clarity, color, etc.) shall be recorded. The field data sheets do not record all required information.

F. Environmental audits.

N/A

G. Type of environmental management systems (EMSs).

N/A

H. Voluntary on-site compliance assessment dates.

N/A

I. Participation in a voluntary pollution reduction program.

N/A

J. Early compliance.

N/A

Sites Outside of Texas

N/A

Compliance History

Customer/Respondent/Owner-Operator:	CN600128128 Safety-Kleen Systems, Inc.	Classification: AVERAGE	Rating: 1.64
Related Entity:	RN100717735 SAFETY-KLEEN ORANGE	Classification: HIGH	Site Rating: 0.00
ID Number(s):	INDUSTRIAL AND HAZARDOUS WASTE GENERATION	EPA ID	TXD061290276
	INDUSTRIAL AND HAZARDOUS WASTE GENERATION	SOLID WASTE REGISTRATION # (SWR)	70026
	INDUSTRIAL AND HAZARDOUS WASTE STORAGE	PERMIT	50257
	AIR NEW SOURCE PERMITS	ACCOUNT NUMBER	OC0415N
	AIR NEW SOURCE PERMITS	PERMIT	50468
	USED OIL	REGISTRATION	A85163
	USED OIL	REGISTRATION	A85163
	STORMWATER	PERMIT	TXR05K199
	IHW CORRECTIVE ACTION	SOLID WASTE REGISTRATION # (SWR)	70026
	Location:	3454 WOMACK RD, ORANGE, TX, 77632	Rating Date: 9/1/2004
TCEQ Region:	REGION 10 - BEAUMONT		
Date Compliance History Prepared:	July 26, 2005		
Agency Decision Requiring Compliance History:	Permit - Issuance, renewal, amendment, modification, denial, suspension, or revocation of a permit.		
Compliance Period:	March 08, 1999 to July 26, 2005		

TCEQ Staff Member to Contact for Additional Information Regarding this Compliance History

Name: Kimberly Sladek Phone: 239-1588

Site Compliance History Components

1. Has the site been in existence and/or operation for the full five year compliance period? Yes
2. Has there been a (known) change in ownership of the site during the compliance period? Yes
3. If Yes, who is the current owner? Safety-Kleen Systems, Inc.
4. If Yes, who was/were the prior owner(s)? N/A
5. When did the change(s) in ownership occur? N/A

Components (Multimedia) for the Site :

- A. Final Enforcement Orders, court judgements, and consent decrees of the state of Texas and the federal government.

N/A

- B. Any criminal convictions of the state of Texas and the federal government.

N/A

- C. Chronic excessive emissions events.

N/A

- D. The approval dates of investigations. (CCEDS Inv. Track. No.)

N/A	1	04/16/2004	(264085)
	2	04/22/2002	(90620)
	3	09/07/2000	(145983)
	4	05/12/2004	(272102)
- E. Written notices of violations (NOV). (CCEDS Inv. Track. No.)

N/A

- F. Environmental audits.

N/A

- G. Type of environmental management systems (EMs).

N/A

- H. Voluntary on-site compliance assessment dates.

N/A

I. Participation in a voluntary pollution reduction program.

N/A

J. Early compliance.

N/A

Sites Outside of Texas

N/A

Compliance History

Owner/Respondent/Owner-Operator:	CN600128128 Safety-Kleen Systems, Inc.	Classification: AVERAGE	Rating: 1.64	
Regulated Entity:	RN100718352 SAFETY-KLEEN WACO	Classification: HIGH	Site Rating: 0.00	
ID Number(s):	INDUSTRIAL AND HAZARDOUS WASTE GENERATION	PERMIT	50238	
	INDUSTRIAL AND HAZARDOUS WASTE GENERATION	EPA ID	TXD980876015	
	INDUSTRIAL AND HAZARDOUS WASTE GENERATION	SOLID WASTE REGISTRATION # (SWR)	66171	
	AIR NEW SOURCE PERMITS	ACCOUNT NUMBER	MB0257G	
	AIR NEW SOURCE PERMITS	PERMIT	51805	
	AIR NEW SOURCE PERMITS	PERMIT	51838	
	AIR NEW SOURCE PERMITS	PERMIT	51805	
	USED OIL	REGISTRATION	A85177	
	USED OIL	REGISTRATION	A85177	
	STORMWATER	PERMIT	TXR05K197	
	Location:	22006 WOODWAY DR, WACO, TX, 76712	Rating Date: 9/1/2004 Repeat Violator: NO	
	TCEQ Region:	REGION 09 - WACO		
Date Compliance History Prepared:	July 26, 2005			
Agency Decision Requiring Compliance History:	Permit - Issuance, renewal, amendment, modification, denial, suspension, or revocation of a permit.			
Compliance Period:	March 08, 1999 to July 26, 2005			

TCEQ Staff Member to Contact for Additional Information Regarding this Compliance History

Name: Kimberly Sladek Phone: 239-1588

Site Compliance History Components

1. Has the site been in existence and/or operation for the full five year compliance period? Yes
2. Have there been a (known) change in ownership of the site during the compliance period? Yes
3. If Yes, who is the current owner? Safety-Kleen Systems, Inc.
4. If Yes, who was/were the prior owner(s)? N/A
5. When did the change(s) in ownership occur? N/A

Components (Multimedia) for the Site :

- A. Final Enforcement Orders, court judgements, and consent decrees of the state of Texas and the federal government. N/A
- B. Any criminal convictions of the state of Texas and the federal government. N/A
- C. Chronic excessive emissions events. N/A
- D. The approval dates of investigations. (CCEDS Inv. Track. No.)

N/A	1	06/14/2000	(30380)
	2	10/03/2002	(12966)
	3	12/02/2002	(9214)
	4	09/07/2000	(146009)
	5	05/12/2004	(262513)
	6	09/10/2002	(11213)
	7	02/15/2005	(350710)
- E. Written notices of violations (NOV). (CCEDS Inv. Track. No.) N/A
- F. Environmental audits. N/A
- G. Type of environmental management systems (EMSs). N/A

H. Voluntary on-site compliance assessment dates.

N/A

I. Participation in a voluntary pollution reduction program.

N/A

J. Early compliance.

N/A

Sites Outside of Texas

N/A

Compliance History

Permitter/Respondent/Owner-Operator:	CN600128128 Safety-Kleen Systems, Inc.	Classification: AVERAGE	Rating: 1.64
Associated Entity:	RN101055143 WYNDHAM ANATOLE HOTEL	Classification: HIGH	Site Rating: 0.00
ID Number(s):	VOLUNTARY CLEANUP PROGRAM	ID NUMBER	1385
Location:	2201 N STEMMONS FWY, DALLAS, TX, 75207	Rating Date: 9/1/2004	Repeat Violator: NO
TCEQ Region:	REGION 04 - DFW METROPLEX		
Date Compliance History Prepared:	July 26, 2005		
Agency Decision Requiring Compliance History:	Permit - Issuance, renewal, amendment, modification, denial, suspension, or revocation of a permit.		
Compliance Period:	March 08, 1999 to July 26, 2005		

TCEQ Staff Member to Contact for Additional Information Regarding this Compliance History

Name: Kimberly Sladek Phone: 239-1588

Site Compliance History Components

- | | |
|--|----------------------------|
| 1. Has the site been in existence and/or operation for the full five year compliance period? | Yes |
| 2. Has there been a (known) change in ownership of the site during the compliance period? | Yes |
| 3. If Yes, who is the current owner? | Safety-Kleen Systems, Inc. |
| | Wyndham Anatole Hotel |
| 4. If Yes, who was/were the prior owner(s)? | N/A |
| 5. When did the change(s) in ownership occur? | N/A |

Components (Multimedia) for the Site :

- A. Final Enforcement Orders, court judgements, and consent decrees of the state of Texas and the federal government.
N/A
 - B. Any criminal convictions of the state of Texas and the federal government.
N/A
 - C. Chronic excessive emissions events.
N/A
 - D. The approval dates of investigations. (CCEDS Inv. Track. No.)
N/A
 - E. Written notices of violations (NOV). (CCEDS Inv. Track. No.)
N/A
 - F. Environmental audits.
N/A
 - G. Type of environmental management systems (EMSs).
N/A
 - H. Voluntary on-site compliance assessment dates.
N/A
 - I. Participation in a voluntary pollution reduction program.
N/A
 - J. Early compliance.
N/A
- Sites Outside of Texas
N/A

Compliance History

Customer/Respondent/Owner-Operator:	CN600128128 Safety-Kleen Systems, Inc.	Classification: AVERAGE	Rating: 1.64
Regulated Entity:	RN101382547 SAFETY-KLEEN AMARILLO	Classification: HIGH	Site Rating: 1.64
ID Number(s):	AIR NEW SOURCE PERMITS	PERMIT	31769
	AIR NEW SOURCE PERMITS	ACCOUNT NUMBER	PG0089M
	PETROLEUM STORAGE TANK REGISTRATION	REGISTRATION	33644
	WATER QUALITY NON PERMITTED	ID NUMBER	R01ST0013
	WATER QUALITY NON PERMITTED	ID NUMBER	R01ST0016
Location:	3811 I-40 E, AMARILLO, TX, 79104	Rating Date: 9/1/2004 Repeat Violator: NO	
TCEQ Region:	REGION 01 - AMARILLO		
Date Compliance History Prepared:	July 26, 2005		
Agency Decision Requiring Compliance History:	Permit - Issuance, renewal, amendment, modification, denial, suspension, or revocation of a permit.		
Compliance Period:	March 08, 1999 to July 26, 2005		

TCEQ Staff Member to Contact for Additional Information Regarding this Compliance History

Name: Kimberly Sladek Phone: 239-1588

Site Compliance History Components

1. Has the site been in existence and/or operation for the full five year compliance period? Yes
2. Has there been a (known) change in ownership of the site during the compliance period? Yes
3. If Yes, who is the current owner?

Safety-Kleen Systems, Inc.
Safety-Kleen (Altair), Inc.
N/A
N/A
4. If Yes, who was/were the prior owner(s)?
5. When did the change(s) in ownership occur?

Components (Multimedia) for the Site :

- A. Final Enforcement Orders, court judgments, and consent decrees of the state of Texas and the federal government.

N/A

- B. Any criminal convictions of the state of Texas and the federal government.

N/A
- C. Chronic excessive emissions events.

N/A
- D. The approval dates of investigations. (CCEDS Inv. Track, No.)

N/A	1	09/07/2000	(145618)
	2	03/07/2000	(41188)
	3	06/04/2001	(113180)
	4	05/25/2001	(113177)
- E. Written notices of violations (NOV). (CCEDS Inv. Track, No.)

N/A
- F. Environmental audits.

N/A
- G. Type of environmental management systems (EMSs).

N/A
- H. Voluntary on-site compliance assessment dates.

N/A
- I. Participation in a voluntary pollution reduction program.

N/A
- J. Early compliance.

N/A

Sites Outside of Texas

N/A

Compliance History

Customer/Respondent/Owner--Operator:	CN600128128 Safety-Kleen Systems, Inc.	Classification: AVERAGE	Rating: 1.64
Regulated Entity:	RN101615870 SAFETY KLEEN SYSTEMS MIDLAND	Classification: AVERAGE	Site Rating: 1
ID Number(s):	INDUSTRIAL AND HAZARDOUS WASTE GENERATION	PERMIT	50215
	INDUSTRIAL AND HAZARDOUS WASTE GENERATION	EPA ID	TXD981056690
	INDUSTRIAL AND HAZARDOUS WASTE GENERATION	SOLID WASTE REGISTRATION # (SWR)	72078
	AIR NEW SOURCE PERMITS	ACCOUNT NUMBER	ML0412F
	AIR NEW SOURCE PERMITS	PERMIT	50471
	USED OIL	REGISTRATION	A85244
	USED OIL	REGISTRATION	A85244
USED OIL	EPA ID	TXD981056690	
Location:	10607 W CR 127, MIDLAND, TX, 79711		Rating Date: 9/1/2004 Repeat Violator: NO
TCEQ Region:	REGION 07 - MIDLAND		
Date Compliance History Prepared:	July 26, 2005		
Agency Decision Requiring Compliance History:	Permit - Issuance, renewal, amendment, modification, denial, suspension, or revocation of a permit.		
Compliance Period:	March 08, 1999 to July 26, 2005		

TCEQ Staff Member to Contact for Additional Information Regarding this Compliance History

Name: Kimberly Staclek Phone: 239-1588

Site Compliance History Components

1. Has the site been in existence and/or operation for the full five year compliance period? Yes
2. Has there been a (known) change in ownership of the site during the compliance period? Yes
3. If Yes, who is the current owner? Safety-Kleen Systems, Inc.
4. If Yes, who was/were the prior owner(s)? N/A
5. When did the change(s) in ownership occur? N/A

Components (Multimedia) for the Site :

- A. Final Enforcement Orders, court judgements, and consent decrees of the state of Texas and the federal government.

N/A
- B. Any criminal convictions of the state of Texas and the federal government.

N/A
- C. Chronic excessive emissions events.

N/A
- D. The approval dates of investigations. (CCEDS Inv. Track. No.)

N/A	1	02/28/2003	(23503)
	2	03/25/2002	(89295)
	3	09/07/2000	(145635)
	4	04/15/2005	(375468)
	5	07/26/2002	(4533)
	6	11/21/2002	(17556)
	7	02/12/2004	(260694)
- E. Written notices of violations (NOV). (CCEDS Inv. Track. No.)

Date: 07/26/2002 (4533)

Self Report? NO Classification: Minor

Citation: 30 TAC Chapter 335, SubChapter F 335.152(a)(19)

Description: Failure to operate the drum washer (Facility 003) under Level 1 Tank Controls.
- F. Environmental audits.

N/A

G. Type of environmental management systems (EMSs).

N/A

H. Voluntary on-site compliance assessment dates.

N/A

I. Participation in a voluntary pollution reduction program.

N/A

J. Early compliance.

N/A

Sites Outside of Texas

N/A

Compliance History

Customer/Respondent/Owner-Operator:	CN600128128	Safety-Kleen Systems, Inc.	Classification: AVERAGE	Rating: 1.64
Regulated Entity:	RN101621746	SAFETY-KLEEN	Classification: HIGH	Site Rating:
ID Number(s):				
Location:	1202-04 N FOREST STREET, AMARILLO, TX, 79101		Rating Date: 9/1/2004 Repeat Violator: NO	
TCEQ Region:	REGION 01 - AMARILLO			
Date Compliance History Prepared:	July 26, 2005			
Agency Decision Requiring Compliance History:	Permit - Issuance, renewal, amendment, modification, denial, suspension, or revocation of a permit.			
Compliance Period:	March 08, 1999 to July 26, 2005			
TCEQ Staff Member to Contact for Additional Information Regarding this Compliance History				
Name:	Kimberly Sladek	Phone:	239-1588	

Site Compliance History Components

- | | |
|--|----------------------------|
| 1. Has the site been in existence and/or operation for the full five year compliance period? | No |
| 2. Has there been a (known) change in ownership of the site during the compliance period? | Yes |
| 3. If Yes, who is the current owner? | Safety-Kleen Systems, Inc. |
| 4. If Yes, who was/were the prior owner(s)? | N/A |
| 5. When did the change(s) in ownership occur? | N/A |

Components (Multimedia) for the Site :

- | | | |
|------------------------|---|--|
| A. | Final Enforcement Orders, court judgements, and consent decrees of the state of Texas and the federal government. | |
| | N/A | |
| B. | Any criminal convictions of the state of Texas and the federal government. | |
| | N/A | |
| C. | Chronic excessive emissions events. | |
| | N/A | |
| D. | The approval dates of investigations. (CCEDS Inv. Track. No.) | |
| | N/A | |
| E. | Written notices of violations (NOV). (CCEDS Inv. Track. No.) | |
| | N/A | |
| F. | Environmental audits. | |
| | N/A | |
| G. | Type of environmental management systems (EMSs). | |
| | N/A | |
| H. | Voluntary on-site compliance assessment dates. | |
| | N/A | |
| I. | Participation in a voluntary pollution reduction program. | |
| | N/A | |
| J. | Early compliance. | |
| | N/A | |
| Sites Outside of Texas | | |
| | N/A | |

Compliance History

Customer/Respondent/Owner-Operator:	CN600128128 Safety-Kleen Systems, Inc.	Classification: AVERAGE	Rating: 1.64
ated Entity:	RN101629004 SAFETY-KLEEN 6-073-01LA PORTE	Classification: HIGH	Site Rating: 0.00
ID Number(s):			
Location:	16th, and W M St, La Porte, TX	Rating Date: 9/1/2004 Repeat Violator: NO	
TCEQ Region:	REGION 12 - HOUSTON		
Date Compliance History Prepared:	July 26, 2005		
Agency Decision Requiring Compliance History:	Permit - Issuance, renewal, amendment, modification, denial, suspension, or revocation of a permit.		
Compliance Period:	March 08, 1999 to July 26, 2005		

TCEQ Staff Member to Contact for Additional Information Regarding this Compliance History

Name: Kimberly Sladek Phone: 239-1588

Site Compliance History Components

- | | |
|--|----------------------------|
| 1. Has the site been in existence and/or operation for the full five year compliance period? | No |
| 2. Has there been a (known) change in ownership of the site during the compliance period? | Yes |
| 3. If Yes, who is the current owner? | Safety-Kleen Systems, Inc. |
| 4. If Yes, who was/were the prior owner(s)? | N/A |
| 5. When did the change(s) in ownership occur? | N/A |

Components (Multimedia) for the Site :

- A. Final Enforcement Orders, court judgements, and consent decrees of the state of Texas and the federal government.

N/A
- F. Any criminal convictions of the state of Texas and the federal government.

N/A
- C. Chronic excessive emissions events.

N/A
- D. The approval dates of investigations. (CCEDS Inv. Track. No.)

N/A
- E. Written notices of violations (NOV). (CCEDS Inv. Track. No.)

N/A
- F. Environmental audits.

N/A
- G. Type of environmental management systems (EMSs).

N/A
- H. Voluntary on-site compliance assessment dates.

N/A
- I. Participation in a voluntary pollution reduction program.

N/A
- J. Early compliance.

N/A
- Sites Outside of Texas

N/A

Compliance History

Customer/Respondent/Owner-Operator:	CN600128128 Safety-Kleen Systems, Inc.	Classification: AVERAGE	Rating: 1.64
Regulated Entity:	RN101719367 SAFETY-KLEEN SYSTEMS GALENA PARK	Classification: HIGH	Site Rating: 1.64
ID Number(s):	USED OIL	REGISTRATION	A85359
	USED OIL	EPA ID	TXR000000786
	INDUSTRIAL AND HAZARDOUS WASTE TRANSPORTATION	SOLID WASTE REGISTRATION # (SWR)	83075
	INDUSTRIAL AND HAZARDOUS WASTE TRANSPORTATION	EPA ID	TXR000000786
	INDUSTRIAL AND HAZARDOUS WASTE TRANSPORTATION	EPA ID	TXR000000786
	INDUSTRIAL AND HAZARDOUS WASTE TRANSPORTATION	SOLID WASTE REGISTRATION # (SWR)	83075
	USED OIL	REGISTRATION	A85359
Location:	900 S MAIN ST, GALENA PARK, TX, 77547		Rating Date: 9/1/2004 Repeat Violator: NO
TCEQ Region:	REGION 12 - HOUSTON		
Date Compliance History Prepared:	July 26, 2005		
Agency Decision Requiring Compliance History:	Permit - Issuance, renewal, amendment, modification, denial, suspension, or revocation of a permit.		
Compliance Period:	March 08, 1999 to July 26, 2005		

TCEQ Staff Member to Contact for Additional Information Regarding this Compliance History

Name: Kimberly Sladek Phone: 239-1588

Site Compliance History Components

1. Has the site been in existence and/or operation for the full five year compliance period? Yes
2. Has there been a (known) change in ownership of the site during the compliance period? Yes
3. If Yes, who is the current owner? Safety-Kleen Systems, Inc.
4. If Yes, who was/were the prior owner(s)? N/A
5. When did the change(s) in ownership occur? N/A

Components (Multimedia) for the Site :

- A. Final Enforcement Orders, court judgements, and consent decrees of the state of Texas and the federal government.
N/A
- B. Any criminal convictions of the state of Texas and the federal government.
N/A
- C. Chronic excessive emissions events.
N/A
- D. The approval dates of investigations. (CCEDS Inv. Track. No.)
N/A 1 09/07/2000 (145661)
- E. Written notices of violations (NOV). (CCEDS Inv. Track. No.)
N/A
- F. Environmental audits.
N/A
- G. Type of environmental management systems (EMSs).
N/A
- H. Voluntary on-site compliance assessment dates.
N/A
- I. Participation in a voluntary pollution reduction program.
N/A
- J. Early compliance.
N/A

Sites Outside of Texas

N/A

Compliance History

Customer/Respondent/Owner-Operator:	CN600128128 Safety-Kleen Systems, Inc.	Classification: AVERAGE	Rating: 1.64
Regulated Entity:	RN101860781 SAFETY-KLEEN SYSTEMS CORPUS CHRISTI	Classification: HIGH	Site Rating: 70
ID Number(s):	INDUSTRIAL AND HAZARDOUS WASTE GENERATION	EPA ID	TXD987995800
	INDUSTRIAL AND HAZARDOUS WASTE GENERATION	SOLID WASTE REGISTRATION # (SWR)	50338
	AIR NEW SOURCE PERMITS USED OIL	ACCOUNT NUMBER	NE0296P
	USED OIL	REGISTRATION	A85526
	USED OIL	REGISTRATION	A85526
	USED OIL	EPA ID	TXD987995800
	STORMWATER	PERMIT	TXRNEP455
Location:	4733 SANTA ELENA ST, CORPUS CHRISTI, TX, 78405		Rating Date: 9/1/2004 Repeat Violator: NO
TCEQ Region:	REGION 14 - CORPUS CHRISTI		
Date Compliance History Prepared:	July 26, 2005		
Agency Decision Requiring Compliance History:	Permit - issuance, renewal, amendment, modification, denial, suspension, or revocation of a permit.		
Compliance Period:	March 08, 1999 to July 26, 2005		

TCEQ Staff Member to Contact for Additional Information Regarding this Compliance History

Name: Kimberly Sladek Phone: 239-1588

Site Compliance History Components

- | | |
|--|----------------------------|
| 1. Has the site been in existence and/or operation for the full five year compliance period? | Yes |
| 2. Has there been a (known) change in ownership of the site during the compliance period? | Yes |
| 3. If Yes, who is the current owner? | Safety-Kleen Systems, Inc. |
| 4. If Yes, who was/were the prior owner(s)? | N/A |
| 5. When did the change(s) in ownership occur? | N/A |

Components (Multimedia) for the Site :

- A. Final Enforcement Orders, court judgements, and consent decrees of the state of Texas and the federal government.

N/A
- B. Any criminal convictions of the state of Texas and the federal government.

N/A
- C. Chronic excessive emissions events.

N/A
- D. The approval dates of investigations. (CCEDS Inv. Track. No.)

N/A	1	09/07/2000	(146094)
	2	03/28/2003	(24278)
	3	02/11/2000	(30892)
- E. Written notices of violations (NOV). (CCEDS Inv. Track. No.)

N/A
- F. Environmental audits.

N/A
- G. Type of environmental management systems (EMSs).

N/A
- H. Voluntary on-site compliance assessment dates.

N/A
- I. Participation in a voluntary pollution reduction program.

N/A
- J. Early compliance.

2020-2021

N/A

Sites Outside of Texas

N/A

Compliance History

Customer/Respondent/Owner-Operator:	CN600128128 Safety-Kleen Systems, Inc.	Classification: AVERAGE	Rating: 1.64
Regulated Entity:	RN101954584 SAFETY KLEEN SYSTEMS INC EL PASO POMP	Classification: HIGH	Site Rating:
ID Number(s):	USED OIL	REGISTRATION	A85527
	USED OIL	REGISTRATION	A85527
	USED OIL	EPA ID	TXD998032595
	STORMWATER	PERMIT	TXRNEQ857
Location:	6000 POMPANO ST, EL PASO, TX, 79924	Rating Date: 9/1/2004 Repeat Violator: NO	
TCEQ Region:	REGION 06 - EL PASO		
Date Compliance History Prepared:	July 26, 2005		
Agency Decision Requiring Compliance History:	Permit - Issuance, renewal, amendment, modification, denial, suspension, or revocation of a permit.		
Compliance Period:	March 08, 1999 to July 26, 2005		

TCEQ Staff Member to Contact for Additional Information Regarding this Compliance History

Name: Kimberly Sladek Phone: 239-1588

Site Compliance History Components

1. Has the site been in existence and/or operation for the full five year compliance period? Yes
2. Has there been a (known) change in ownership of the site during the compliance period? Yes
3. If Yes, who is the current owner? Safety-Kleen Systems, Inc.
4. If Yes, who was/were the prior owner(s)? N/A
5. When did the change(s) in ownership occur? N/A

Components (Multimedia) for the Site :

- A. Final Enforcement Orders, court judgements, and consent decrees of the state of Texas and the federal government.

N/A
 - B. Any criminal convictions of the state of Texas and the federal government.

N/A
 - C. Chronic excessive emissions events.

N/A
 - D. The approval dates of investigations. (CCEDS Inv. Track. No.)

N/A	1	03/05/2003	(26539)
	2	09/07/2000	(145857)
 - E. Written notices of violations (NOV). (CCEDS Inv. Track. No.)

N/A
 - F. Environmental audits.

N/A
 - G. Type of environmental management systems (EMSs).

N/A
 - H. Voluntary on-site compliance assessment dates.

N/A
 - I. Participation in a voluntary pollution reduction program.

N/A
 - J. Early compliance.

N/A
- Sites Outside of Texas
- N/A

Compliance History

Customer/Respondent/Owner-Operator:	CN600128128 Safety-Kleen Systems, Inc.	Classification: AVERAGE	Rating: 1.64
Registered Entity:	RN101958494 INDUSTRIAL SERVICE	Classification: HIGH	Site Rating: 0.00
ID Number(s):	USED OIL	REGISTRATION	A85279
	USED OIL	REGISTRATION	A85279
	USED OIL	EPA ID	TX0000555045
	INDUSTRIAL AND HAZARDOUS WASTE TRANSPORTATION	SOLID WASTE REGISTRATION # (SWR)	83144
	INDUSTRIAL AND HAZARDOUS WASTE TRANSPORTATION	EPA ID	TX0000555045
	Location:	12212 COUNTY LINE ROAD 31, SLATON, TX, 79364	Rating Date: 9/1/2004 Repeat Violator: NO
TCEQ Region:	REGION 02 - LUBBOCK		
Date Compliance History Prepared:	July 26, 2005		
Agency Decision Requiring Compliance History:	Permit - Issuance, renewal, amendment, modification, denial, suspension, or revocation of a permit.		
Compliance Period:	March 08, 1999 to July 26, 2005		

TCEQ Staff Member to Contact for Additional Information Regarding this Compliance History

Name: Kimberly Sladek Phone: 239-1588

Site Compliance History Components

- | | |
|--|----------------------------|
| 1. Has the site been in existence and/or operation for the full five year compliance period? | Yes |
| 2. Has there been a (known) change in ownership of the site during the compliance period? | Yes |
| 3. If Yes, who is the current owner? | Safety-Kleen Systems, Inc. |
| 4. If Yes, who was/were the prior owner(s)? | N/A |
| 5. When did the change(s) in ownership occur? | N/A |

Components (Multimedia) for the Site :

- A. Final Enforcement Orders, court judgements, and consent decrees of the state of Texas and the federal government.
N/A
- B. Any criminal convictions of the state of Texas and the federal government.
N/A
- C. Chronic excessive emissions events.
N/A
- D. The approval dates of investigations. (CCEDS Inv. Track. No.)
N/A 1 09/07/2000 (145646)
- E. Written notices of violations (NOV). (CCEDS Inv. Track. No.)
N/A
- F. Environmental audits.
N/A
- G. Type of environmental management systems (EMSs).
N/A
- H. Voluntary on-site compliance assessment dates.
N/A
- I. Participation in a voluntary pollution reduction program.
N/A
- J. Early compliance.
N/A
- Sites Outside of Texas
N/A

Compliance History

Customer/Respondent/Owner-Operator: CN600128128 Safety-Kleen Systems, Inc. Classification: AVERAGE Rating: 1.64
Regulated Entity: RN101999217 SAFETY KLEEN ABILENE Classification: HIGH Site Rating: _____
ID Number(s): _____
Location: LOCOST AND SOUTH 2ND STREETS Rating Date: 9/1/2004 Repeat Violator: NO
TCEQ Region: REGION 03 - ABILENE
Date Compliance History Prepared: July 26, 2005
Agency Decision Requiring Compliance History: Permit - Issuance, renewal, amendment, modification, denial, suspension, or revocation of a permit.
Compliance Period: March 08, 1999 to July 26, 2005

TCEQ Staff Member to Contact for Additional Information Regarding this Compliance History

Name: Kimberly Sładek Phone: 239-1588

Site Compliance History Components

1. Has the site been in existence and/or operation for the full five year compliance period? No
2. Has there been a (known) change in ownership of the site during the compliance period? Yes
3. If Yes, who is the current owner? Southern Switching Company
4. If Yes, who was/were the prior owner(s)? N/A
5. When did the change(s) in ownership occur? N/A

Components (Multimedia) for the Site :

- A. Final Enforcement Orders, court judgements, and consent decrees of the state of Texas and the federal government.
N/A
 - B. Any criminal convictions of the state of Texas and the federal government.
N/A
 - C. Chronic excessive emissions events.
N/A
 - D. The approval dates of investigations. (CCEDS Inv. Track. No.)
N/A
 - E. Written notices of violations (NOV). (CCEDS Inv. Track. No.)
N/A
 - F. Environmental audits.
N/A
 - G. Type of environmental management systems (EMSs).
N/A
 - H. Voluntary on-site compliance assessment dates.
N/A
 - I. Participation in a voluntary pollution reduction program.
N/A
 - J. Early compliance.
N/A
- Sites Outside of Texas
N/A

Compliance History

Permit/Respondent/Owner-Operator:	CN600128128 Safety-Kleen Systems, Inc.	Classification: AVERAGE	Rating: 1.64
Permitted Entity:	RN102037678 SAFETY KLEEN CORP 6 073 02	Classification: HIGH	Site Rating: 0.00
ID Number(s):			
Location:	3913 ARC ST, HOUSTON, TX, 77063	Rating Date: 9/1/2004 Repeat Violator: NO	
TCEQ Region:	REGION 12 - HOUSTON		
Date Compliance History Prepared:	July 26, 2005		
Agency Decision Requiring Compliance History:	Permit - Issuance, renewal, amendment, modification, denial, suspension, or revocation of a permit.		
Compliance Period:	March 08, 1999 to July 26, 2005		

TCEQ Staff Member to Contact for Additional Information Regarding this Compliance History

Name: Kimberly Sladek Phone: 239-1588

Site Compliance History Components

- | | |
|--|-----------------------------------|
| 1. Has the site been in existence and/or operation for the full five year compliance period? | No |
| 2. Has there been a (known) change in ownership of the site during the compliance period? | Yes |
| 3. If Yes, who is the current owner? | <u>Safety-Kleen Systems, Inc.</u> |
| 4. If Yes, who was/were the prior owner(s)? | <u>N/A</u> |
| 5. When did the change(s) in ownership occur? | <u>N/A</u> |

Components (Multimedia) for the Site :

- | | | |
|------------------------|---|--|
| A. | Final Enforcement Orders, court judgements, and consent decrees of the state of Texas and the federal government. | |
| | <u>N/A</u> | |
| B. | Any criminal convictions of the state of Texas and the federal government. | |
| | <u>N/A</u> | |
| C. | Chronic excessive emissions events. | |
| | <u>N/A</u> | |
| D. | The approval dates of investigations. (CCEDS Inv. Track. No.) | |
| | <u>N/A</u> | |
| E. | Written notices of violations (NOV). (CCEDS Inv. Track. No.) | |
| | <u>N/A</u> | |
| F. | Environmental audits. | |
| | <u>N/A</u> | |
| G. | Type of environmental management systems (EMSs). | |
| | <u>N/A</u> | |
| H. | Voluntary on-site compliance assessment dates. | |
| | <u>N/A</u> | |
| I. | Participation in a voluntary pollution reduction program. | |
| | <u>N/A</u> | |
| J. | Early compliance. | |
| | <u>N/A</u> | |
| Sites Outside of Texas | | |
| | <u>N/A</u> | |

Compliance History

Customer/Respondent/Owner-Operator:	CN600128128 Safety-Kleen Systems, Inc.	Classification: AVERAGE	Rating: 1.64
Regulated Entity:	RN102070224 SAFETY KLEEN ORANGE	Classification: AVERAGE BY DEFAULT	Site Rating:
ID Number(s):	MUNICIPAL SOLID WASTE PROCESSING REGISTRATION		40122
Location:	WOMACK ROAD & OLD HIGHWAY 90 SAFETY KLEEN	Rating Date: 9/1/2004	Repeat Violator: NO
TCEQ Region:	REGION 10 - BEAUMONT		
Date Compliance History Prepared:	July 26, 2005		
Agency Decision Requiring Compliance History:	Permit - Issuance, renewal, amendment, modification, denial, suspension, or revocation of a permit.		
Compliance Period:	March 08, 1999 to July 26, 2005		

TCEQ Staff Member to Contact for Additional Information Regarding this Compliance History

Name: Kimberly Slaclek Phone: 239-1588

Site Compliance History Components

- | | |
|--|--------------------------------------|
| 1. Has the site been in existence and/or operation for the full five year compliance period? | Yes |
| 2. Has there been a (known) change in ownership of the site during the compliance period? | Yes |
| 3. If Yes, who is the current owner? | <u>Houseman Development Co. Inc.</u> |
| 4. If Yes, who was/were the prior owner(s)? | <u>N/A</u> |
| 5. When did the change(s) in ownership occur? | <u>N/A</u> |

Components (Multimedia) for the Site :

- A. Final Enforcement Orders, court judgements, and consent decrees of the state of Texas and the federal government.
N/A
 - B. Any criminal convictions of the state of Texas and the federal government.
N/A
 - C. Chronic excessive emissions events.
N/A
 - D. The approval dates of investigations. (CCEDS Inv. Track. No.)
N/A
 - E. Written notices of violations (NOV). (CCEDS Inv. Track. No.)
N/A
 - F. Environmental audits.
N/A
 - G. Type of environmental management systems (EMSs).
N/A
 - H. Voluntary on-site compliance assessment dates.
N/A
 - I. Participation in a voluntary pollution reduction program.
N/A
 - J. Early compliance.
N/A
- Sites Outside of Texas
N/A

Compliance History

Permitter/Respondent/Owner-Operator:	CN600128128 Safety-Kleen Systems, Inc.	Classification: AVERAGE	Rating: 1.64
Related Entity:	RN102070505 SAFETY KLEEN WICHITA FALLS FISHER RD	Classification: AVERAGE BY DEFAULT	Site Rating: 3.01
ID Number(s):	MUNICIPAL SOLID WASTE PROCESSING	REGISTRATION	40125
	USED OIL	REGISTRATION	A85834
	USED OIL	REGISTRATION	A85834
Location:	1500 FISHER RD, WICHITA FALLS, TX, 76305		Rating Date: 9/1/2004 Repeat Violator: NO
TCEQ Region:	REGION 03 - ABILENE		
Date Compliance History Prepared:	July 26, 2005		
Agency Decision Requiring Compliance History:	Permit - Issuance, renewal, amendment, modification, denial, suspension, or revocation of a permit.		
Compliance Period:	March 08, 1999 to July 26, 2005		
TCEQ Staff Member to Contact for Additional Information Regarding this Compliance History			
Name:	Kimberly Sladek	Phone:	239-1588

Site Compliance History Components

- | | |
|--|-------------------|
| 1. Has the site been in existence and/or operation for the full five year compliance period? | Yes |
| 2. Has there been a (known) change in ownership of the site during the compliance period? | Yes |
| 3. If Yes, who is the current owner? | Serva Corporation |
| 4. If Yes, who was/were the prior owner(s)? | N/A |
| 5. When did the change(s) in ownership occur? | N/A |

Components (Multimedia) for the Site :

- | | | | |
|----|---|--|--|
| A. | Final Enforcement Orders, court judgements, and consent decrees of the state of Texas and the federal government. | | |
| | N/A | | |
| B. | Any criminal convictions of the state of Texas and the federal government. | | |
| | N/A | | |
| C. | Chronic excessive emissions events. | | |
| | N/A | | |
| D. | The approval dates of investigations. (CCEDS Inv. Track. No.) | | |
| | N/A | | |
| E. | Written notices of violations (NOV). (CCEDS Inv. Track. No.) | | |
| | N/A | | |
| F. | Environmental audits. | | |
| | N/A | | |
| G. | Type of environmental management systems (EMSs). | | |
| | N/A | | |
| H. | Voluntary on-site compliance assessment dates. | | |
| | N/A | | |
| I. | Participation in a voluntary pollution reduction program. | | |
| | N/A | | |
| J. | Early compliance. | | |
| | N/A | | |
| K. | Outside of Texas | | |
| | N/A | | |

Compliance History

Customer/Respondent/Owner-Operator:	CN600128128 Safety-Kleen Systems, Inc.	Classification: AVERAGE	Rating: 1.64
Regulated Entity:	RN102148301 SAFETY-KLEEN SYSTEMS AMARILLO BRANCH	Classification: HIGH	Site Rating:
ID Number(s):	USED OIL	REGISTRATION	A85733
	INDUSTRIAL AND HAZARDOUS WASTE GENERATION	EPA ID	TXR000031799
	INDUSTRIAL AND HAZARDOUS WASTE GENERATION	SOLID WASTE REGISTRATION # (SWR)	86125
	AIR NEW SOURCE PERMITS	PERMIT	51510
Location:	1750 W LOOP 335 S, AMARILLO, TX, 79110		Rating Date: 9/1/2004 Repeat Violator: NO
TCEQ Region:	REGION 01 - AMARILLO		
Date Compliance History Prepared:	July 26, 2005		
Agency Decision Requiring Compliance History:	Permit - Issuance, renewal, amendment, modification, denial, suspension, or revocation of a permit.		
Compliance Period:	March 08, 1999 to July 26, 2005		
TCEQ Staff Member to Contact for Additional Information Regarding this Compliance History			
Name:	Kimberly Sladok	Phone:	239-1588

Site Compliance History Components

1. Has the site been in existence and/or operation for the full five year compliance period? Yes
2. Has there been a (known) change in ownership of the site during the compliance period? Yes
3. If Yes, who is the current owner? Safety-Kleen Systems, Inc.
4. If Yes, who was/were the prior owner(s)? N/A
5. When did the change(s) in ownership occur? N/A

Components (Multimedia) for the Site :

- A. Final Enforcement Orders, court judgements, and consent decrees of the state of Texas and the federal government. N/A
 - B. Any criminal convictions of the state of Texas and the federal government. N/A
 - C. Chronic excessive emissions events. N/A
 - D. The approval dates of investigations. (CCEDS Inv. Track. No.)

N/A	1	07/03/2003	(60802)
	2	03/09/2000	(30076)
 - E. Written notices of violations (NOV). (CCEDS Inv. Track. No.) N/A
 - F. Environmental audits. N/A
 - G. Type of environmental management systems (EMSs). N/A
 - H. Voluntary on-site compliance assessment dates. N/A
 - I. Participation in a voluntary pollution reduction program. N/A
 - J. Early compliance. N/A
- Sites Outside of Texas N/A

Compliance History

Customer/Respondent/Owner-Operator:	CN600128128 Safety-Kleen Systems, Inc.	Classification: AVERAGE	Rating: 1.64
ated Entity:	RN102149275 SAFETY-KLEEN	Classification: HIGH	Site Rating: 0.00
ID Number(s):			
Location:	13523 CONKLIN LN, HOUSTON, TX, 77034	Rating Date: 9/1/2004 Repeat Violator: NO	
TCEQ Region:	REGION 12 - HOUSTON		
Date Compliance History Prepared:	July 26, 2005		
Agency Decision Requiring Compliance History:	Permit - Issuance, renewal, amendment, modification, denial, suspension, or revocation of a permit.		
Compliance Period:	March 08, 1999 to July 26, 2005		

TCEQ Staff Member to Contact for Additional Information Regarding this Compliance History

Name: Kimberly Sladek Phone: 239-1588

Site Compliance History Components

- | | |
|--|-----------------------------------|
| 1. Has the site been in existence and/or operation for the full five year compliance period? | No |
| 2. Has there been a (known) change in ownership of the site during the compliance period? | Yes |
| 3. If Yes, who is the current owner? | Safety-Kleen Systems, Inc. |
| | Southwestern Bell Telephone, L.P. |
| 4. If Yes, who was/were the prior owner(s)? | N/A |
| 5. When did the change(s) in ownership occur? | N/A |

Components (Multimedia) for the Site :

- A. Final Enforcement Orders, court judgements, and consent decrees of the state of Texas and the federal government.

N/A
- B. Any criminal convictions of the state of Texas and the federal government.

N/A
- C. Chronic excessive emissions events.

N/A
- D. The approval dates of investigations. (CCEDS Inv. Track. No.)

N/A	1	08/31/1999	(118586)
	2	09/07/2000	(145918)
- E. Written notices of violations (NOV). (CCEDS Inv. Track. No.)

N/A
- F. Environmental audits.

N/A
- G. Type of environmental management systems (EMSs).

N/A
- H. Voluntary on-site compliance assessment dates.

N/A
- I. Participation in a voluntary pollution reduction program.

N/A
- J. Early compliance.

N/A
- S. Outside of Texas

N/A

Compliance History

Customer/Respondent/Owner-Operator:	CN600128128	Safety-Kleen Systems, Inc.	Classification: AVERAGE	Rating: 1.64
Regulated Entity:	RN102165214	SAFETY KLEEN TANK FARM	Classification: AVERAGE BY DEFAULT	Site Rating: 2.01
ID Number(s):	AIR NEW SOURCE PERMITS		ACCOUNT NUMBER	LN0220L
Location:	LOOP 289 NE AND HWY 62 AND 82. (IDALOU ROAD)		Rating Date: 9/1/2004	Repeat Violator: NO
TCEQ Region:	REGION 02 - LUBBOCK			
Date Compliance History Prepared:	July 26, 2005			
Agency Decision Requiring Compliance History:	Permit - Issuance, renewal, amendment, modification, denial, suspension, or revocation of a permit.			
Compliance Period:	March 08, 1999 to July 26, 2005			

TCEQ Staff Member to Contact for Additional Information Regarding this Compliance History

Name: Kimberly Sladek Phone: 239-1588

Site Compliance History Components

1. Has the site been in existence and/or operation for the full five year compliance period? Yes
2. Has there been a (known) change in ownership of the site during the compliance period? Yes
3. If Yes, who is the current owner? Safety-Kleen Systems, Inc.
4. If Yes, who was/were the prior owner(s)? N/A
5. When did the change(s) in ownership occur? N/A

Components (Multimedia) for the Site :

- A. Final Enforcement Orders, court judgements, and consent decrees of the state of Texas and the federal government.
N/A
 - B. Any criminal convictions of the state of Texas and the federal government.
N/A
 - C. Chronic excessive emissions events.
N/A
 - D. The approval dates of investigations. (CCEDS Inv. Track. No.)
N/A
 - E. Written notices of violations (NOV). (CCEDS Inv. Track. No.)
N/A
 - F. Environmental audits.
N/A
 - G. Type of environmental management systems (EMSs).
N/A
 - H. Voluntary on-site compliance assessment dates.
N/A
 - I. Participation in a voluntary pollution reduction program.
N/A
 - J. Early compliance.
N/A
- Sites Outside of Texas
N/A

Compliance History

Customer/Respondent/Owner-Operator:	CN600128128 Safety-Kleen Systems, Inc.	Classification: AVERAGE	Rating: 1.64
ated Entity:	RN102191004 SOLVENT TRANSFER STATION	Classification: AVERAGE BY DEFAULT	Site Rating: 3.01
ID Number(s):	AIR NEW SOURCE PERMITS	ACCOUNT NUMBER	GJ0154A
Location:	LONGVIEW	Rating Date: 9/1/2004 Repeat Violator: NO	
TCEQ Region:	REGION 05 - TYLER		
Date Compliance History Prepared:	July 26, 2005		
Agency Decision Requiring Compliance History:	Permit - Issuance, renewal, amendment, modification, denial, suspension, or revocation of a permit.		
Compliance Period:	March 08, 1999 to July 26, 2005		
TCEQ Staff Member to Contact for Additional Information Regarding this Compliance History			
Name:	Kimberly Sladek	Phone:	239-1588

Site Compliance History Components

- | | |
|--|----------------------------|
| 1. Has the site been in existence and/or operation for the full five year compliance period? | Yes |
| 2. Has there been a (known) change in ownership of the site during the compliance period? | Yes |
| 3. If Yes, who is the current owner? | Safety-Kleen Systems, Inc. |
| 4. If Yes, who was/were the prior owner(s)? | N/A |
| 5. When did the change(s) in ownership occur? | N/A |

Components (Multimedia) for the Site :

- A. Final Enforcement Orders, court judgements, and consent decrees of the state of Texas and the federal government.
N/A
- Any criminal convictions of the state of Texas and the federal government.
N/A
- C. Chronic excessive emissions events.
N/A
- D. The approval dates of investigations. (CCEDS Inv. Track. No.)
N/A
- E. Written notices of violations (NOV). (CCEDS Inv. Track. No.)
N/A
- F. Environmental audits.
N/A
- G. Type of environmental management systems (EMSs).
N/A
- H. Voluntary on-site compliance assessment dates.
N/A
- I. Participation in a voluntary pollution reduction program.
N/A
- J. Early compliance.
N/A
- Sites Outside of Texas
N/A

Compliance History

Customer/Respondent/Owner-Operator:	CN600128128 Safety-Kleen Systems, Inc.	Classification: AVERAGE	Rating: 1.64
Regulated Entity:	RN102211869 SAFETY-KLEEN SYSTEMS FORT WORTH	Classification: HIGH	Site Rating: 2.00
ID Number(s):	USED OIL	REGISTRATION	A85312
	USED OIL	REGISTRATION	A85312
	STORMWATER	PERMIT	TXR05P122
	INDUSTRIAL AND HAZARDOUS WASTE DISPOSAL	PERMIT	83150
Location:	10272 HICKS FIELD RD, FORT WORTH, TX, 76179	Rating Date: 9/1/2004 Repeat Violator: NO	
TCEQ Region:	REGION 04 - DFW METROPLEX		
Date Compliance History Prepared:	July 26, 2005		
Agency Decision Requiring Compliance History:	Permit - Issuance, renewal, amendment, modification, denial, suspension, or revocation of a permit.		
Compliance Period:	March 08, 1999 to July 26, 2005		

TCEQ Staff Member to Contact for Additional Information Regarding this Compliance History

Name: Kimberly Sladek Phone: 239-1588

Site Compliance History Components

1. Has the site been in existence and/or operation for the full five year compliance period? Yes
2. Has there been a (known) change in ownership of the site during the compliance period? Yes
3. If Yes, who is the current owner? Safety-Kleen Systems, Inc.
4. If Yes, who was/were the prior owner(s)? N/A
5. When did the change(s) in ownership occur? N/A

Components (Multimedia) for the Site :

- A. Final Enforcement Orders, court judgements, and consent decrees of the state of Texas and the federal government.

N/A
 - B. Any criminal convictions of the state of Texas and the federal government.

N/A
 - C. Chronic excessive emissions events.

N/A
 - D. The approval dates of investigations. (CCEDS Inv. Track. No.)

N/A	1	12/23/1999	(119665)
	2	09/07/2000	(145654)
 - E. Written notices of violations (NOV). (CCEDS Inv. Track. No.)

N/A
 - F. Environmental audits.

N/A
 - G. Type of environmental management systems (EMSs).

N/A
 - H. Voluntary on-site compliance assessment dates.

N/A
 - I. Participation in a voluntary pollution reduction program.

N/A
 - J. Early compliance.

N/A
- Sites Outside of Texas
- N/A

Compliance History

Customer/Respondent/Owner-Operator:	CN600128128 Safety-Kleen Systems, Inc.	Classification: AVERAGE	Rating: 1.64
Registered Entity:	RN102211877 SAFETY KLEEN SYSTEMS INC HALTOM CITY	Classification: AVERAGE BY DEFAULT	Site Rating: 3.01
ID Number(s):	STORMWATER PERMIT STORMWATER PERMIT		TXRNEQ438 TXRNEQ438
Location:	6529 MIDWAY RD, HALTOM CITY, TX, 76117	Rating Date: 9/1/2004	Repeat Violator: NO
TCEQ Region:	REGION 04 - DFW METROPLEX		
Date Compliance History Prepared:	July 26, 2005		
Agency Decision Requiring Compliance History:	Permit - Issuance, renewal, amendment, modification, denial, suspension, or revocation of a permit.		
Compliance Period:	March 08, 1999 to July 26, 2005		

TCEQ Staff Member to Contact for Additional Information Regarding this Compliance History

Name: Kimberly Sladek Phone: 239-1588

Site Compliance History Components

1. Has the site been in existence and/or operation for the full five year compliance period? Yes
2. Has there been a (known) change in ownership of the site during the compliance period? Yes
3. If Yes, who is the current owner? Safety-Kleen Systems, Inc.
4. If Yes, who was/were the prior owner(s)? N/A
5. When did the change(s) in ownership occur? N/A

Components (Multimedia) for the Site :

- A. Final Enforcement Orders, court judgements, and consent decrees of the state of Texas and the federal government.

N/A
 - B. Any criminal convictions of the state of Texas and the federal government.

N/A
 - C. Chronic excessive emissions events.

N/A
 - D. The approval dates of investigations. (CCEDS Inv. Track. No.)

N/A
 - E. Written notices of violations (NOV). (CCEDS Inv. Track. No.)

N/A
 - F. Environmental audits.

N/A
 - G. Type of environmental management systems (EMSs).

N/A
 - H. Voluntary on-site compliance assessment dates.

N/A
 - I. Participation in a voluntary pollution reduction program.

N/A
 - J. Early compliance.

N/A
- Site: Outside of Texas
- N/A

Compliance History

Customer/Respondent/Owner-Operator:	CN600128128 Safety-Kleen Systems, Inc.	Classification: AVERAGE	Rating: 1.64
Regulated Entity:	RN102244340 SAFETY-KLEEN EL PASO 6 056 14	Classification: AVERAGE	Site Rating: 1.64
ID Number(s):	INDUSTRIAL AND HAZARDOUS WASTE PERMIT		50247
	INDUSTRIAL AND HAZARDOUS WASTE GENERATION	EPA ID	TXD000747394
	INDUSTRIAL AND HAZARDOUS WASTE GENERATION	SOLID WASTE REGISTRATION # (SWR)	63019
	PETROLEUM STORAGE TANK REGISTRATION	REGISTRATION	33643
	AIR NEW SOURCE PERMITS	ACCOUNT NUMBER	EE24970
	AIR NEW SOURCE PERMITS	PERMIT	51188
	USED OIL	REGISTRATION	A85240
	USED OIL	REGISTRATION	A85240
	STORMWATER	PERMIT	TXRNEQ920
Location:	900 HAWKINS BLVD STE B, EL PASO, TX, 79915		Rating Date: 9/1/2004 Repeat Violator: NO
TCEQ Region:	REGION 06 - EL PASO		
Date Compliance History Prepared:	July 26, 2005		
Agency Decision Requiring Compliance History:	Permit - Issuance, renewal, amendment, modification, denial, suspension, or revocation of a permit.		
Compliance Period:	March 08, 1999 to July 26, 2005		

TCEQ Staff Member to Contact for Additional Information Regarding this Compliance History

Name: Kimberly Sladek Phone: 239-1588

Site Compliance History Components

1. Has the site been in existence and/or operation for the full five year compliance period? Yes
2. Has there been a (known) change in ownership of the site during the compliance period? Yes
3. If Yes, who is the current owner? Safety-Kleen (Altair), Inc.
Safety-Kleen Systems, Inc.
4. If Yes, who was/were the prior owner(s)? N/A
5. When did the change(s) in ownership occur? N/A

Components (Multimedia) for the Site :

- A. Final Enforcement Orders, court judgements, and consent decrees of the state of Texas and the federal government. N/A
- B. Any criminal convictions of the state of Texas and the federal government. N/A
- C. Chronic excessive emissions events. N/A
- D. The approval dates of investigations. (CCEDS Inv. Track. No.)

N/A	1	03/05/2003	(26537)
	2	06/30/2004	(248325)
	3	09/07/2000	(145757)
	4	07/29/2004	(285517)
	5	01/17/2002	(76201)
	6	05/07/2004	(249865)

E. Written notices of violations (NOV). (CCEDS Inv. Track. No.)

Date: 06/30/2004 (248325) Classification: Moderate

Self Report? NO

Citation: 30 TAC Chapter 305, SubChapter D 305.69[G]

Rqml Prov: PERMIT IA

Description: Failure to ensure that waste unit 001 reflects an underground storage tank in the permit (the permit incorrectly lists an above grade tank) and that waste unit 002 reflects the actual capacity of 4,320 gallons as listed in the permit application (the permit incorrectly lists a capacity of 3,830 gallons) in Attachment

Classification: Moderate

Self Report? NO

Citation: 30 TAC Chapter 305, SubChapter D 305.69[G]

Rqmt. Prov: PERMIT IA

Description: Failure to ensure that unit 001's (waste solvent underground storage tank) specifications (10,000-gallon steel tank with a polyurethane liner) are accurately described in the permit.

Classification: Moderate

Self Report? NO

Citation: 30 TAC Chapter 305, SubChapter F 305.125(1)

40 CFR Chapter 264, SubChapter I, PT 264, SubPT J 264.191(a)

Rqmt. Prov: PERMIT IA

Description: Failure to comply with secondary containment (permit provision V.C.4.) requirement for waste management unit 001.

F. Environmental audits.

N/A

G. Type of environmental management systems (EMSs).

N/A

H. Voluntary on-site compliance assessment dates.

N/A

I. Participation in a voluntary pollution reduction program.

N/A

J. Early compliance.

N/A

Sites Outside of Texas

N/A

Compliance History

Customer/Respondent/Owner-Operator:	CN600128128 Safety-Kleen Systems, Inc.	Classification: AVERAGE	Rating: 1.64
Regulated Entity:	RN102306917 SAFETY KLEEN CORP	Classification: AVERAGE BY DEFAULT	Site Rating: 1
ID Number(s):	AIR NEW SOURCE PERMITS	PERMIT	39103
	AIR NEW SOURCE PERMITS	ACCOUNT NUMBER	TA3830S
Location:	SAME		Rating Date: 9/1/2004 Repeat Violator: NO
TCEQ Region:	REGION 04 - DFW METROPLEX		
Date Compliance History Prepared:	July 26, 2005		
Agency Decision Requiring Compliance History:	Permit - Issuance, renewal, amendment, modification, denial, suspension, or revocation of a permit.		
Compliance Period:	March 08, 1999 to July 26, 2005		
TCEQ Staff Member to Contact for Additional Information Regarding this Compliance History			
Name:	Kimberly Sladek	Phone:	239-1588

Site Compliance History Components

- | | |
|--|----------------------------|
| 1. Has the site been in existence and/or operation for the full five year compliance period? | Yes |
| 2. Has there been a (known) change in ownership of the site during the compliance period? | Yes |
| 3. If Yes, who is the current owner? | Safety-Kleen Systems, Inc. |
| 4. If Yes, who was/were the prior owner(s)? | N/A |
| 5. When did the change(s) in ownership occur? | N/A |

Components (Multimedia) for the Site :

- A. Final Enforcement Orders, court judgments, and consent decrees of the state of Texas and the federal government.
N/A
 - B. Any criminal convictions of the state of Texas and the federal government.
N/A
 - C. Chronic excessive emissions events.
N/A
 - D. The approval dates of investigations. (CCEDS Inv. Track. No.)
N/A
 - E. Written notices of violations (NOV). (CCEDS Inv. Track. No.)
N/A
 - F. Environmental audits.
N/A
 - G. Type of environmental management systems (EMSs).
N/A
 - H. Voluntary on-site compliance assessment dates.
N/A
 - I. Participation in a voluntary pollution reduction program.
N/A
 - J. Early compliance.
N/A
- Sites Outside of Texas
N/A

Compliance History

Permit/Respondent/Owner-Operator:	CN600128128 Safety-Kleen Systems, Inc.	Classification: AVERAGE	Rating: 1.64
Related Entity:	RN102386190 SAFETY KLEEN SYSTEMS	Classification: HIGH	Site Rating: 0.00
ID Number(s):	USED OIL	REGISTRATION	A85700
Location:	1301 GERVAIS ST, COLUMBIA, SC, 29201	Rating Date: 9/1/2004	Repeat Violator: NO
TCEQ Region:	REGION 05 - TYLER		
Date Compliance History Prepared:	July 26, 2005		
Agency Decision Requiring Compliance History:	Permit - Issuance, renewal, amendment, modification, denial, suspension, or revocation of a permit.		
Compliance Period:	March 08, 1999 to July 26, 2005		
TCEQ Staff Member to Contact for Additional Information Regarding this Compliance History			
Name:	Kimberly Sladek	Phone:	239-1588

Site Compliance History Components

- | | |
|--|----------------------------|
| 1. Has the site been in existence and/or operation for the full five year compliance period? | Yes |
| 2. Has there been a (known) change in ownership of the site during the compliance period? | Yes |
| 3. If Yes, who is the current owner? | Safety-Kleen Systems, Inc. |
| 4. If Yes, who was/were the prior owner(s)? | N/A |
| 5. When did the change(s) in ownership occur? | N/A |

Components (Multimedia) for the Site :

- A. Final Enforcement Orders, court judgements, and consent decrees of the state of Texas and the federal government.

N/A
- Any criminal convictions of the state of Texas and the federal government.

N/A
- C. Chronic excessive emissions events.

N/A
- D. The approval dates of investigations. (CCEDS Inv. Track. No.)

N/A
- E. Written notices of violations (NOV). (CCEDS Inv. Track. No.)

N/A
- F. Environmental audits.

N/A
- G. Type of environmental management systems (EMSs).

N/A
- H. Voluntary on-site compliance assessment dates.

N/A
- I. Participation in a voluntary pollution reduction program.

N/A
- J. Early compliance.

N/A
- Sites Outside of Texas

N/A

Compliance History

Customer/Respondent/Owner-Operator:	CN600128128 Safety-Kleen Systems, Inc.	Classification: AVERAGE	Rating: 1.64
Regulated Entity:	RN102648071 SAFETY KLEEN LIQUID TRANSFER STATION	Classification: AVERAGE BY DEFAULT	Site Rating
ID Number(s):	MUNICIPAL SOLID WASTE PROCESSING	REGISTRATION	40183
Location:	SHERMAN BURLESON STREETS	Rating Date: 9/1/2004	Repeat Violator: NO
TCEQ Region:	REGION 13 - SAN ANTONIO		
Date Compliance History Prepared:	July 26, 2005		
Agency Decision Requiring Compliance History:	Permit - Issuance, renewal, amendment, modification, denial, suspension, or revocation of a permit.		
Compliance Period:	March 08, 1999 to July 26, 2005		

TCEQ Staff Member to Contact for Additional Information Regarding this Compliance History

Name: Kimberly Sladek Phone: 239-1588

Site Compliance History Components

- | | |
|--|--------------------------------|
| 1. Has the site been in existence and/or operation for the full five year compliance period? | No |
| 2. Has there been a (known) change in ownership of the site during the compliance period? | Yes |
| 3. If Yes, who is the current owner? | <u>Savage Industries, Inc.</u> |
| 4. If Yes, who was/were the prior owner(s)? | <u>N/A</u> |
| 5. When did the change(s) in ownership occur? | <u>N/A</u> |

Components (Multimedia) for the Site :

- A. Final Enforcement Orders, court judgements, and consent decrees of the state of Texas and the federal government.
N/A
 - B. Any criminal convictions of the state of Texas and the federal government.
N/A
 - C. Chronic excessive emissions events.
N/A
 - D. The approval dates of investigations. (CEEDS Inv. Track. No.)
N/A
 - E. Written notices of violations (NOV). (CEEDS Inv. Track. No.)
N/A
 - F. Environmental audits.
N/A
 - G. Type of environmental management systems (EMSs).
N/A
 - H. Voluntary on-site compliance assessment dates.
N/A
 - I. Participation in a voluntary pollution reduction program.
N/A
 - J. Early compliance.
N/A
- Sites Outside of Texas
N/A

Compliance History

Customer/Respondent/Owner-Operator:	CN600128128 Safety-Kleen Systems, Inc.	Classification: AVERAGE	Rating: 1.64
ated Entity:	RN102804564 SAFETY KLEEN 60490	Classification: HIGH	Site Rating: 0.00
ID Number(s):			
Location:	1049 INDUSTRIAL BLVD, HEWITT, TX, 76643	Rating Date: 9/1/2004 Repeat Violator: NO	
TCEQ Region:	REGION 09 - WACO		
Date Compliance History Prepared:	July 26, 2005		
Agency Decision Requiring Compliance History:	Permit - Issuance, renewal, amendment, modification, denial, suspension, or revocation of a permit.		
Compliance Period:	March 08, 1999 to July 26, 2005		
TCEQ Staff Member to Contact for Additional Information Regarding this Compliance History			
Name:	Kimberly Sladek	Phone:	239-1588

Site Compliance History Components

- | | |
|--|----------------------------|
| 1. Has the site been in existence and/or operation for the full five year compliance period? | No |
| 2. Has there been a (known) change in ownership of the site during the compliance period? | Yes |
| 3. If Yes, who is the current owner? | Safety-Kleen Systems, Inc. |
| 4. If Yes, who was/were the prior owner(s)? | N/A |
| 5. When did the change(s) in ownership occur? | N/A |

Components (Multimedia) for the Site :

- A. Final Enforcement Orders, court judgements, and consent decrees of the state of Texas and the federal government.

N/A
 - F. Any criminal convictions of the state of Texas and the federal government.

N/A
 - C. Chronic excessive emissions events.

N/A
 - D. The approval dates of investigations. (CCEDS Inv. Track. No.)

N/A
 - E. Written notices of violations (NOV). (CCEDS Inv. Track. No.)

N/A
 - F. Environmental audits.

N/A
 - G. Type of environmental management systems (EMSS).

N/A
 - H. Voluntary on-site compliance assessment dates.

N/A
 - I. Participation in a voluntary pollution reduction program.

N/A
 - J. Early compliance.

N/A
- Sites Outside of Texas

N/A

Compliance History

Customer/Respondent/Owner-Operator:	CN600128128	Safety-Kleen Systems, Inc.	Classification: AVERAGE	Rating: 1.64
Regulated Entity:	RN102940525	SAFETY KLEEN SYSTEMS HAZARDOUS WASTE TRANSPORTER	Classification: AVERAGE BY DEFAULT	Site Rating: 2.01
ID Number(s):	INDUSTRIAL AND HAZARDOUS WASTE TRANSPORTATION	EPA ID	TXR000050930	
	INDUSTRIAL AND HAZARDOUS WASTE TRANSPORTATION	SOLID WASTE REGISTRATION # (SWR)	87109	
Location:	5400 LEGACY DR CLUSTER II B3, PLANO, TX, 75024		Rating Date: 9/1/2004 Repeat Violator: NO	
TCEQ Region:	REGION 04 - DFW METROPLEX			
Date Compliance History Prepared:	July 26, 2005			
Agency Decision Requiring Compliance History:	Permit - Issuance, renewal, amendment, modification, denial, suspension, or revocation of a permit.			
Compliance Period:	March 08, 1999 to July 26, 2005			

TCEQ Staff Member to Contact for Additional Information (Regarding this Compliance History)

Name: Kimberly Stadek Phone: 239-1588

Site Compliance History Components

- | | |
|--|-----------------------------------|
| 1. Has the site been in existence and/or operation for the full five year compliance period? | No |
| 2. Has there been a (known) change in ownership of the site during the compliance period? | Yes |
| 3. If Yes, who is the current owner? | <u>Safety-Kleen Systems, Inc.</u> |
| 4. If Yes, who was/were the prior owner(s)? | <u>N/A</u> |
| 5. When did the change(s) in ownership occur? | <u>N/A</u> |

Components (Multimedia) for the Site :

- A. Final Enforcement Orders, court judgements, and consent decrees of the state of Texas and the federal government.
N/A
 - B. Any criminal convictions of the state of Texas and the federal government.
N/A
 - C. Chronic excessive emissions events.
N/A
 - D. The approval dates of investigations. (CCEDS Inv. Track, No.)
N/A
 - E. Written notices of violations (NOV). (CCEDS Inv. Track, No.)
N/A
 - F. Environmental audits.
N/A
 - G. Type of environmental management systems (EMSs).
N/A
 - H. Voluntary on-site compliance assessment dates.
N/A
 - I. Participation in a voluntary pollution reduction program.
N/A
 - J. Early compliance.
N/A
- Sites Outside of Texas
N/A

Compliance History

Customer/Respondent/Owner-Operator:	CN600128128 Safety-Kleen Systems, Inc.	Classification: AVERAGE	Rating: 1.64
ated Entity:	RN102949021 CLEAN HARBORS LA PORTE	Classification: HIGH	Site Rating: 0.00
ID Number(s):	INDUSTRIAL AND HAZARDOUS WASTE GENERATION	PERMIT	50225
	INDUSTRIAL AND HAZARDOUS WASTE GENERATION	EPA ID	TXD982290140
	INDUSTRIAL AND HAZARDOUS WASTE GENERATION	SOLID WASTE REGISTRATION # (SWR)	50225
	AIR NEW SOURCE PERMITS	ACCOUNT NUMBER	HG3978F
	AIR NEW SOURCE PERMITS	PERMIT	41107
	AIR NEW SOURCE PERMITS	PERMIT	47940
	AIR NEW SOURCE PERMITS	ACCOUNT NUMBER	HX1811R
	AIR NEW SOURCE PERMITS	REGISTRATION	71797
	AIR NEW SOURCE PERMITS	PERMIT	55530
	USED OIL	REGISTRATION	A85635
	USED OIL	REGISTRATION	A85635
	USED OIL	EPA ID	TXD982290140
	PUBLIC WATER SYSTEM/SUPPLY	REGISTRATION	1012760
	WATER LICENSING	LICENSE	1012760
	STORMWATER	PERMIT	TXRNER789
Location:	500 BATTLEGROUND RD, LA PORTE, TX, 77571		Rating Date: 9/1/2004 Repeat Violator: NO
TCEQ Region:	REGION 12 - HOUSTON		
Date Compliance History Prepared:	July 26, 2005		
Agency Decision Requiring Compliance History:	Permit - Issuance, renewal, amendment, modification, denial, suspension, or revocation of a permit.		
Compliance Period:	March 08, 1999 to July 26, 2005		

TCEQ Staff Member to Contact for Additional Information Regarding this Compliance History

Name: Kimberly Sladek Phone: 239-1588

Site Compliance History Components

1. Has the site been in existence and/or operation for the full five year compliance period? Yes
2. Has there been a (known) change in ownership of the site during the compliance period? Yes
3. If Yes, who is the current owner?

Safety-Kleen Systems, Inc.
Laidlaw Environmental Services
Clean Harbors Environmental Services, Inc.
Clean Harbors LaPorte, L.P.
4. If Yes, who was/were the prior owner(s)? N/A
5. When did the change(s) in ownership occur? N/A

Components (Multimedia) for the Site :

- A. Final Enforcement Orders, court judgements, and consent decrees of the state of Texas and the federal government.

N/A

- B. Any criminal convictions of the state of Texas and the federal government.

N/A

- C. Chronic excessive emissions events.

N/A

- D. The approval dates of investigations. (CCEDS Inv. Track. No.)

N/A	1	08/10/2000	(30685)
	2	12/03/1999	(30684)
	3	09/07/2000	(144863)
	4	04/17/2003	(31109)
	5	01/14/2000	(144751)
	6	06/17/1999	(134181)

E. Written notices of violations (NOV). (CCEDS Inv. Track. No.)

N/A

F. Environmental audits.

N/A

G. Type of environmental management systems (EMSs).

N/A

H. Voluntary on-site compliance assessment dates.

N/A

I. Participation in a voluntary pollution reduction program.

N/A

J. Early compliance.

N/A

Sites Outside of Texas

N/A

Compliance History

Customer/Respondent/Owner-Operator: CN600128128 Safety-Kleen Systems, Inc. Classification: AVERAGE Rating: 1.64
Related Entity: RN103009015 AMERICAN MEDICAL RESPONSE Classification: HIGH Site Rating: 0.00
ID Number(s):
Location: 11911 RADIUM ST, SAN ANTONIO, TX, 78216 Rating Date: 9/1/2004 Repeat Violator: NO
TCEQ Region: REGION 13 - SAN ANTONIO
Date Compliance History Prepared: July 26, 2005
Agency Decision Requiring Compliance History: Permit - Issuance, renewal, amendment, modification, denial, suspension, or revocation of a permit.
Compliance Period: March 08, 1999 to July 26, 2005

TCEQ Staff Member to Contact for Additional Information Regarding this Compliance History

Name: Kimberly Sladek Phone: 239-1588

Site Compliance History Components

1. Has the site been in existence and/or operation for the full five year compliance period? Yes
2. Has there been a (known) change in ownership of the site during the compliance period? Yes
3. If Yes, who is the current owner? N/A
4. If Yes, who was/were the prior owner(s)? N/A
5. When did the change(s) in ownership occur? N/A

Components (Multimedia) for the Site :

- A. Final Enforcement Orders, court judgements, and consent decrees of the state of Texas and the federal government.
N/A
 - B. Any criminal convictions of the state of Texas and the federal government.
N/A
 - C. Chronic excessive emissions events.
N/A
 - D. The approval dates of investigations. (CCEDS Inv. Track. No.)
N/A
 - E. Written notices of violations (NOV). (CCEDS Inv. Track. No.)
N/A
 - F. Environmental audits.
N/A
 - G. Type of environmental management systems (EMSs).
N/A
 - H. Voluntary on-site compliance assessment dates.
N/A
 - I. Participation in a voluntary pollution reduction program.
N/A
 - J. Early compliance.
N/A
- Sites Outside of Texas
N/A

Compliance History

Customer/Respondent/Owner-Operator:	CN600128128 Safety-Kleen Systems, Inc.	Classification: AVERAGE	Rating: 1.64
Regulated Entity:	RN103033650 CORPUS CHRISTI BRANCH	Classification: HIGH	Site Rating: 0.00
ID Number(s):	AIR NEW SOURCE PERMITS	ACCOUNT NUMBER	NE0506E
Location:	3820 BRATTON RD	Rating Date: 9/1/2004	Repeat Violator: NO
TCEQ Region:	REGION 14 - CORPUS CHRISTI		
Date Compliance History Prepared:	July 26, 2005		
Agency Decision Requiring Compliance History:	Permit - Issuance, renewal, amendment, modification, denial, suspension, or revocation of a permit.		
Compliance Period:	March 08, 1999 to July 26, 2005		

TCEQ Staff Member to Contact for Additional Information Regarding this Compliance History

Name: Kimberly Sladek Phone: 239-1688

Site Compliance History Components

1. Has the site been in existence and/or operation for the full five year compliance period? No
2. Has there been a (known) change in ownership of the site during the compliance period? Yes
3. If Yes, who is the current owner? Safety-Kleen Systems, Inc.
4. If Yes, who was/were the prior owner(s)? N/A
5. When did the change(s) in ownership occur? N/A

Components (Multimedia) for the Site :

- A. Final Enforcement Orders, court judgements, and consent decrees of the state of Texas and the federal government.

N/A
 - B. Any criminal convictions of the state of Texas and the federal government.

N/A
 - C. Chronic excessive emissions events.

N/A
 - D. The approval dates of investigations. (CCEDS Inv. Track. No.)

N/A	1	07/01/2002	(90294)
	2	08/21/2003	(148005)
 - E. Written notices of violations (NOV). (CCEDS Inv. Track. No.)

N/A
 - F. Environmental audits.

N/A
 - G. Type of environmental management systems (EMSs).

N/A
 - H. Voluntary on-site compliance assessment dates.

N/A
 - I. Participation in a voluntary pollution reduction program.

N/A
 - J. Early compliance.

N/A
- Sites Outside of Texas
- N/A

Compliance History

Customer/Respondent/Owner-Operator:	CN600128128 Safety-Kleen Systems, Inc.	Classification: AVERAGE	Rating: 1.64
Related Entity:	RN104065420 SAFETY-KLEEN SYSTEMS DENTON DISTRIBUTION CENTER	Classification: AVERAGE BY DEFAULT	Site Rating: 3.01
ID Number(s):	INDUSTRIAL AND HAZARDOUS WASTE GENERATION	EPA ID	TXR000053959
	INDUSTRIAL AND HAZARDOUS WASTE GENERATION	SOLID WASTE REGISTRATION # (SWR)	87243
Location:	2269 N MASCH BRANCH RD STE 3, DENTON, TX, 76207		Rating Date: 9/1/2004 Repeat Violator: NO
TCEQ Region:	REGION 04 - DFW METROPLEX		
Date Compliance History Prepared:	July 26, 2005		
Agency Decision Requiring Compliance History:	Permit - Issuance, renewal, amendment, modification, denial, suspension, or revocation of a permit.		
Compliance Period:	March 08, 1999 to July 26, 2005		

TCEQ Staff Member to Contact for Additional Information Regarding this Compliance History

Name: Kimberly Sladek Phone: 239-1588

Site Compliance History Components

- | | |
|--|-----------------------------------|
| 1. Has the site been in existence and/or operation for the full five year compliance period? | No |
| 2. Has there been a (known) change in ownership of the site during the compliance period? | Yes |
| 3. If Yes, who is the current owner? | <u>Safety-Kleen Systems, Inc.</u> |
| 4. If Yes, who was/were the prior owner(s)? | <u>N/A</u> |
| 5. When did the change(s) in ownership occur? | <u>N/A</u> |

Components (Multimedia) for the Site :

- A. Final Enforcement Orders, court judgements, and consent decrees of the state of Texas and the federal government.

N/A
- B. Any criminal convictions of the state of Texas and the federal government.

N/A
- C. Chronic excessive emissions events.

N/A
- D. The approval dates of investigations. (CCEDS Inv. Track. No.)

N/A
- E. Written notices of violations (NOV). (CCEDS Inv. Track. No.)

N/A
- F. Environmental audits.

N/A
- G. Type of environmental management systems (EMSs).

N/A
- H. Voluntary on-site compliance assessment dates.

N/A
- I. Participation in a voluntary pollution reduction program.

N/A
- J. Early compliance.

N/A
- K. Outside of Texas

N/A

Compliance History

Customer/Respondent/Owner-Operator:	CN600128128 Safety-Kleen Systems, Inc.	Classification: AVERAGE	Rating: 1.64
Regulated Entity:	RN104149091 SAFETY KLEEN SYSTEMS EL PASO	Classification: AVERAGE BY DEFAULT	Site Rating: 3.01
ID Number(s):	STORMWATER PERMIT		TXRNEQ460
Location:	ON 900 A HAWKINS BLVD	Rating Date: 9/1/2004	Repeat Violator: NO
TCEQ Region:	REGION 06 - EL PASO		
Date Compliance History Prepared:	July 26, 2005		
Agency Decision Requiring Compliance History:	Permit - Issuance, renewal, amendment, modification, denial, suspension, or revocation of a permit.		
Compliance Period:	March 08, 1999 to July 26, 2005		
TCEQ Staff Member to Contact for Additional Information Regarding this Compliance History			
Name:	Kimberly Sladek	Phone:	239-1588

Site Compliance History Components

- | | |
|--|----------------------------|
| 1. Has the site been in existence and/or operation for the full five year compliance period? | No |
| 2. Has there been a (known) change in ownership of the site during the compliance period? | Yes |
| 3. If Yes, who is the current owner? | Safety-Kleen Systems, Inc. |
| 4. If Yes, who was/were the prior owner(s)? | N/A |
| 5. When did the change(s) in ownership occur? | N/A |

Components (Multimedia) for the Site :

- A. Final Enforcement Orders, court judgements, and consent decrees of the state of Texas and the federal government.
N/A
 - B. Any criminal convictions of the state of Texas and the federal government.
N/A
 - C. Chronic excessive emissions events.
N/A
 - D. The approval dates of investigations. (CCEDS Inv. Track. No.)
N/A
 - E. Written notices of violations (NOV). (CCEDS Inv. Track. No.)
N/A
 - F. Environmental audits.
N/A
 - G. Type of environmental management systems (EMSs).
N/A
 - H. Voluntary on-site compliance assessment dates.
N/A
 - I. Participation in a voluntary pollution reduction program.
N/A
 - J. Early compliance.
N/A
- Sites Outside of Texas
N/A

Compliance History

Customer/Respondent/Owner-Operator:	CN600128128 Safety-Kleen Systems, Inc.	Classification: AVERAGE	Rating: 1.64
Related Entity:	RN104386958 SAFETY-KLEEN SYSTEMS	Classification: HIGH	Site Rating: 0.00
ID Number(s):			
Location:	4234 OIL BELT LN, ABILENE, TX, 79605	Rating Date: 9/1/2004 Repeat Violator: NO	
TCEQ Region:	REGION 03 - ABILENE		
Date Compliance History Prepared:	July 26, 2005		
Agency Decision Requiring Compliance History:	Permit - Issuance, renewal, amendment, modification, denial, suspension, or revocation of a permit.		
Compliance Period:	March 08, 1999 to July 26, 2005		
TCEQ Staff Member to Contact for Additional Information Regarding this Compliance History			
Name:	Kimberly Sladek	Phone:	239-1588

Site Compliance History Components

- | | |
|--|----------------------------|
| 1. Has the site been in existence and/or operation for the full five year compliance period? | No |
| 2. Has there been a (known) change in ownership of the site during the compliance period? | Yes |
| 3. If Yes, who is the current owner? | Safety-Kleen Systems, Inc. |
| 4. If Yes, who was/were the prior owner(s)? | N/A |
| 5. When did the change(s) in ownership occur? | N/A |

Components (Multimedia) for the Site :

- A. Final Enforcement Orders, court judgements, and consent decrees of the state of Texas and the federal government.
N/A
 - B. Any criminal convictions of the state of Texas and the federal government.
N/A
 - C. Chronic excessive emissions events.
N/A
 - D. The approval dates of investigations. (CCEDS Inv. Track. No.)
N/A
 - E. Written notices of violations (NOV). (CCEDS Inv. Track. No.)
N/A
 - F. Environmental audits.
N/A
 - G. Type of environmental management systems (EMSs).
N/A
 - H. Voluntary on-site compliance assessment dates.
N/A
 - I. Participation in a voluntary pollution reduction program.
N/A
 - J. Early compliance.
N/A
- Sites Outside of Texas
N/A

Compliance History

Customer/Respondent/Owner-Operator:	CN600128128 Safety-Kleen Systems, Inc.	Classification: AVERAGE	Rating: 1.64
Regulated Entity:	RN104523246 SAFETY KLEEN FORT WORTH LIQUID TRANSFER STATION	Classification: AVERAGE BY DEFAULT	Site Rating: 01
ID Number(s):	MUNICIPAL SOLID WASTE PROCESSING REGISTRATION		40127
Location:	1500 NORTHEAST PKWY, FORT WORTH, TX, 76106	Rating Date: 9/1/2004	Repeat Violator: NO
TCEQ Region:	REGION 04 - DFW METROPLEX		
Date Compliance History Prepared:	July 26, 2005		
Agency Decision Requiring Compliance History:	Permit - Issuance, renewal, amendment, modification, denial, suspension, or revocation of a permit.		
Compliance Period:	March 08, 1999 to July 26, 2005		

TCEQ Staff Member to Contact for Additional Information Regarding this Compliance History

Name: Kimberly Sladok Phone: 239-1588

Site Compliance History Components

- | | |
|--|-----------------------|
| 1. Has the site been in existence and/or operation for the full five year compliance period? | Yes |
| 2. Has there been a (known) change in ownership of the site during the compliance period? | Yes |
| 3. If Yes, who is the current owner? | Safety Kleen Longview |
| 4. If Yes, who was/were the prior owner(s)? | N/A |
| 5. When did the change(s) in ownership occur? | N/A |

Components (Multimedia) for the Site :

- A. Final Enforcement Orders, court judgements, and consent decrees of the state of Texas and the federal government.
N/A
 - B. Any criminal convictions of the state of Texas and the federal government.
N/A
 - C. Chronic excessive emissions events.
N/A
 - D. The approval dates of Investigations. (CCEDS Inv. Track. No.)
N/A
 - E. Written notices of violations (NOV). (CCEDS Inv. Track. No.)
N/A
 - F. Environmental audits.
N/A
 - G. Type of environmental management systems (EMSs).
N/A
 - H. Voluntary on-site compliance assessment dates.
N/A
 - I. Participation in a voluntary pollution reduction program.
N/A
 - J. Early compliance.
N/A
- Sites Outside of Texas
N/A

Attachment D
Executive Director's Response to Public Comment

TCEQ Permit No. 50163

Application by
Safety-Kleen Systems, Inc.,
For Renewal and Amendment of
IHW Permit No. 50163

Before the
Texas Commission on
Environmental Quality

CHIEF CLERK'S OFFICE

2006 SEP 27 PM 4:43

TEXAS
COMMISSION
ON ENVIRONMENTAL
QUALITY

EXECUTIVE DIRECTOR'S RESPONSE TO PUBLIC COMMENT

The Executive Director of the Texas Commission on Environmental Quality (TCEQ) files this Response to Public Comment on the application by Safety-Kleen Systems, Inc. (Safety-Kleen), for renewal and major amendment of Hazardous Waste Permit No. 50163 and on the Executive Director's preliminary decision on the application.

As required by Title 30 of the Texas Administrative Code Section 55.156, before an application is approved, the Executive Director prepares a response to all timely, relevant and material, or significant public comments. The Office of the Chief Clerk timely received comment letters and comments at the public meetings from the following persons:

Monika Antonelli	Alan Kajihara
Eva H. Cadwallader	April Kendra
Darlene Collins	Jim Kendra
Sherry Collins	Jeff Krueger
Bryan E. Evans	Peggy B. La Point
Dan Fette	Dona Lusk
Jeff Fincher	Jennie Maples
Kelly Fincher	Joe C. Nelson
Joan Floyd	Delores Olmon
Pat Gobble	E. Parks Olmon
Patricia "Pati" G. Haworth	Kirk Pendergrass
Teresa Heffer	Robert Pitt
Barbara C. Holladay-Vernon	Joy Powell
Cone Johnson	John Remley
John W. Johnson	Tim Riehl

Lisa Rosenberg

Russ Rosenberg

Claudia Saltzman

Stephen Saltzman

Mark Sandel

Morgan Smith

Sue Smith

Carol Soph

Edward "Ed" B. Soph

Kiersty Stewart

Dawn Swepston

Gregory R. Thiele

Heidi Thiele

Jim Waisanen

Edward D. Wittmis

This response to public comment addresses all timely public comments received, whether or not withdrawn.

If you would like more information about this application or the permitting process, please call TCEQ's Office of Public Assistance at 1-800-687-4040. General information about TCEQ can be found at our Web site at www.tceq.state.tx.us.

I. Description of Facility

Safety-Kleen Systems, Inc., Denton Recycle Center, is a commercial, industrial, and hazardous-waste management facility that performs solvent recycling and reclamation, fuel blending, and recoverable-fuels marketing. The facility conducts waste storage and processing as part of commercial operations. Wastes are received from off-site sources on a commercial basis.

The wastes managed by the facility include industrial and municipal hazardous wastes and Class 1, Class 2, and Class 3 industrial solid waste. Safety-Kleen is located at 1702 Cooper Creek Road, on approximately 21.1566 acres in Denton, Denton County, Texas. The site is within the drainage area of Segment No. 0328 of the Trinity River Basin (North Latitude 33°14'15", West Longitude 97°04'53"). Safety-Kleen has applied to TCEQ for a permit renewal and major amendment that would authorize Safety-Kleen to continue to receive, store, and process industrial and municipal hazardous and

nonhazardous wastes, authorize new Container Storage Area No. 5, and authorize additional waste codes.

II. Procedural History

On March 9, 2004, TCEQ received this application for permit renewal and amendment. On August 11, 2004, the application was declared administratively complete. On August 25, 2004, the Notice of Receipt of Application and Intent to Obtain an Industrial and Hazardous Waste Permit Amendment and Renewal for this application was published in the *Denton Record-Chronicle*.

On December 13, 2004, a public meeting was held in Denton. On September 23, 2005, the Executive Director completed the technical review of the application and prepared a final draft permit. On December 19, 2005, the Notice of Application and Preliminary Decision was published in the *Denton Record-Chronicle*. The Executive Director received from the public and from local elected officials requests to hold a second public meeting. On March 28, 2006, a second public meeting was held in Denton, and the public comment period ended.

Because this application was declared administratively complete after September 1, 1999, this action is subject to the procedural requirements adopted under House Bill 801.¹

III. Comments and Responses

Comments have been organized under topic headings. Comments that produce the same response have been grouped together.

¹ Tex. H.B. 801, 76th Leg., R.S. (1999).

TCEQ Rules and Application Review

Comment 1:

Gregory Thiele and Heidi Thiele asked what TCEQ's role is in creating, evaluating, and enforcing the rules that regulate the facility.

Response 1:

The U.S. Environmental Protection Agency promulgates federal regulations for hazardous-waste management. The State of Texas has been delegated the authority to implement the Texas hazardous-waste program. As the state environmental regulatory agency, TCEQ has jurisdiction to adopt and enforce the federal regulations and to promulgate state regulations that are equivalent to or more stringent than the federal regulations.

In the rulemaking process, a rule team consisting of TCEQ staff members coordinates development of proposed rules. The proposed rules are published in the Texas Register, and the public may submit comments. The rule team responds to public comment on the rules. After the different offices in TCEQ approve the draft rules, the Commissioners determine whether to adopt the rules.²

Comment 2:

Barbara Holladay-Vernon asked what the current rules are.

Response 2:

TCEQ rules are codified in Title 30 of the Texas Administrative Code, which is separated into chapters.

² The governor appoints TCEQ Commissioners to establish overall agency direction and policy and to make final determinations on contested permitting and enforcement matters.

Chapter 335 governs industrial and hazardous-waste management and contains the main body of rules that govern the Safety-Kleen facility. Chapter 335 also incorporates particular federal rules, which are codified in Title 40 of the Code of Federal Regulations, Chapter I, Subchapter I (related to solid waste).

Other chapters that relate to the Safety-Kleen application include Chapter 37 (related to financial assurance requirements), Chapter 39 (related to public notice requirements), Chapter 50 (related to procedures for action on applications), Chapter 55 (related to procedures for public comment and hearing requests), Chapter 60 (related to compliance histories), Chapter 80 (related to procedures for contested case hearings), Chapter 281 (related to processing applications), and Chapter 305 (related to standards for permits).

You can find links to both TCEQ regulations and federal regulations on the Internet through TCEQ's Web site at <http://www.tceq.state.tx.us/>.

Comment 3:

Patricia Haworth commented that the application does not include a current map of the surrounding population within a three-mile radius of the facility.

Response 3:

TCEQ rules do not require a map of surrounding population within a three-mile radius; however, the Executive Director required Safety-Kleen to provide a topographic map extending one mile beyond the facility's boundaries. The map provided the approximate boundaries of the areas occupied by each active, inactive, and proposed hazardous-waste management unit; groundwater monitoring wells; boreholes; wells; springs; and other surface-water bodies; and drinking-water wells listed in the public records or otherwise known to Safety-Kleen.

The technical portion of the application review process involves three technical levels of review: (1) review by the permit project manager, (2) review by the team leader, and (3) review by the section manager. These levels of review ensure the final draft permit is

consistent with technical and regulatory requirements and with the policy under the Texas Solid Waste Disposal Act to protect human health and the environment.³

The Executive Director evaluated the map with the other information in the application, including the secondary containment system, and determined that the application complies with regulatory requirements.

Comment 4:

April Kendra and Jim Kendra asked about operations contemplated over the scope of the permit.

Response 4:

The Executive Director develops a permit based on requests in an application. Safety-Kleen has requested renewal of its permit to authorize continued storage and processing of hazardous and nonhazardous wastes in tanks, container storage areas, and miscellaneous units. Safety-Kleen also seeks authorization to manage additional waste codes that are similar to the wastes the facility currently manages under its original permit. If the final draft permit is approved, the permit would be issued for a period of ten years.⁴ The permit would not authorize Safety-Kleen to change any procedures in the way the facility manages waste during the permit renewal period.⁵

Land Use

Comment 5:

Jeff Fincher asked what TCEQ requires regarding the proximity of a new plant to residential areas. Jeff Fincher asked if TCEQ would approve the current application if it

³ TEX. HEALTH & SAFETY CODE ANN. § 361.002 (2001).

⁴ 30 TEX. ADMIN. CODE § 305.127(1)(B) (2006); Final Draft Permit p.1.

⁵ Final Draft Permit Prov. II.A.1.

were for a new facility. Carol Soph commented that an application for a new facility would not be allowed within a fifty-mile radius of schools and residences. Joe Nelson commented that it would be unwise to allow the facility to expand because of the population growth in the area.

Patricia Haworth and Carol Soph commented that the application does not consider proximity to residences, even though an application for a new hazardous-waste permit would be denied because of the facility's proximity to residences. Ed Soph commented that TCEQ would deny an application for a new hazardous-waste permit for a facility at this location because the facility is within one-half mile of residences and churches. Eva Cadwallader and Dan Fette oppose renewal of the permit because Safety-Kleen would not be able to get a permit for this location if the application were for a new facility.

Monika Antonelli commented that she opposes renewal of the permit because the facility is near a school and because of the effect pollution may have on children. Dona Lusk and Mark Sandel commented about the location of the facility near a school in a residential neighborhood. Kelly Fincher commented that the facility should be moved away from residential areas and schools. Eva Cadwallader commented that she opposes renewal of the permit and expansion because the area has a high population that continues to grow. Patricia Haworth and Ed Soph commented that the facility is located in a residential area that continues to grow. Kelly Fincher, Claudia Saltzman, and Stephen Saltzman asked whether expansion should be allowed in an area that is becoming more residential and less industrial.

Response 5:

TCEQ rules prohibit issuance of a permit for a new commercial hazardous-waste management facility if that facility would be located within one-half mile of an established residence, church, school, day-care center, surface-water body used for a public drinking water supply, or dedicated public park.⁶

⁶ 30 TEX. ADMIN. CODE § 335.205(a) (2006).

Section 335.205 applies specifically to applications for new facilities and to applications that seek to expand the area of existing facilities. Because Safety-Kleen's application requests renewal of a permit for an existing facility and does not seek to expand the area of the facility, the location requirements in Section 335.205(a)(3)-(4) do not apply.

The Texas Solid Waste Disposal Act seeks to safeguard human health and welfare and the environment by controlling the management of solid waste.⁷ Under TCEQ rules, Safety-Kleen is prohibited from operating in a manner that endangers public health and welfare.⁸ This prohibition applies to new facilities and to existing facilities, whether those facilities are close to or far from residential properties.

The Executive Director evaluated the safety measures in the application, including the training program, emergency response plan, and fire suppression system, and determined that the application complies with regulatory requirements.

Buffer Zone

Comment 6:

Carol Soph commented that the area between the facility and the surrounding property lacks a proper buffer and commented about the buffer area between storage tanks.

Response 6:

Federal regulations require waste containers to be located at least fifty feet from the facility's property line.⁹ Safety-Kleen maintains a fifty-foot buffer zone around the facility.

⁷ TEX. HEALTH & SAFETY CODE ANN. § 361.002 (2001).

⁸ 30 TEX. ADMIN. CODE §335.4 (2006).

⁹ 40 C.F.R. § 264.176 (2005).

There are no federal or state requirements regarding buffer areas between storage tanks; however, federal regulations contain specific requirements regarding storage of ignitable or reactive wastes in tanks. Safety-Kleen must maintain protective distances between the waste-management area and any public ways, streets, alleys, or adjoining property lines.¹⁰ Based on information in its application, Safety-Kleen has met this requirement. For additional protection, Safety-Kleen has installed dikes, berms, and a wall barrier.

The Executive Director evaluated the specifications for the buffer zone at the facility and determined that the buffer zone complies with regulatory requirements.

Capacity and Expansion

Comment 7:

April Kendra and Jim Kendra commented that, if additional material will be stored at the facility, more people should work at Safety-Kleen to supervise operations. Peggy La Point commented that the application should be denied unless Safety-Kleen maintains a team of expert emergency personnel large enough to handle a major emergency.

Response 7:

The Legislature established TCEQ's jurisdiction over waste management in the Texas Solid Waste Disposal Act. TCEQ does not have jurisdiction over issues related to the size of Safety-Kleen's work force.

The final draft permit requires Safety-Kleen to train its staff in the safe handling and management of industrial solid waste and municipal hazardous waste.¹¹ Safety-Kleen must also make available at all times a trained emergency coordinator who coordinates

¹⁰ 40 C.F.R. § 264.198(b) (2005).

¹¹ Final Draft Permit Prov. III.B (requiring Safety-Kleen to satisfy training requirements of 40 C.F.R. § 264.16 (2005)).

all emergency response measures.¹² The emergency coordinator at the facility must follow detailed procedures if there is the threat of an imminent emergency or if an actual emergency occurs.¹³

Comment 8:

Eva Cadwallader, Kelly Fincher, Peggy La Point, Claudia Saltzman, Stephen Saltzman, and Ed Soph commented that increasing storage capacity would increase danger to nearby residents and the environment. Sue Smith commented about safety in relation to the proposed expansion. Monika Antonelli asked whether doubling storage capacity would release more than 2000 pounds of hydrochloric acid. Dan Fette commented that doubling capacity at the facility would double the risk of spills during transport. Claudia Saltzman and Stephen Saltzman commented that they oppose granting authorization to increase capacity because of the risk of accidents. Ed Soph commented that the permit does not address the increased hazards that accompany expanding capacity.

Ed Soph commented that, even though this facility is an existing facility and the application does not seek to increase the size of the property, the dangers that accompany storage expansion should allow the review of this application to include consideration of proximity to residences and churches.

Eva Cadwallader, Darlene Collins, Barbara Holladay-Vernon, Alan Kajihara, and Dona Lusk commented that they did not want the facility to increase capacity or expand. Eva Cadwallader commented that the facility should be severely contracted, not expanded. Patricia Haworth and Ed Soph commented that the permit should not be renewed unless the permit is amended to limit capacity to the amount of waste that is stored there now or less. Alan Kajihara commented that the permit could be limited to the amount of waste that Safety-Kleen is currently processing. Barbara Holladay-Vernon commented that storage capacity should be reduced until Safety-Kleen improves its management of waste.

¹² Final Draft Permit Prov. III.E.5; 40 C.F.R. § 264.55 (2005). *See also* 30 TEX. ADMIN. CODE § 335.153 (2006).

¹³ 40 C.F.R. § 264.56 (2005).

Ed Soph commented that storage capacity should be reduced as population in the area grows.

Response 8:

When an entity seeks authorization to operate a facility like the Safety-Kleen facility, the entity must acquire (1) authorization for total storage capacity and (2) authorization to construct and operate specific storage units, which are tanks and container storage areas that would hold waste. The entity must submit design specifications about the storage units the entity wants to construct, and TCEQ must authorize each storage unit before a permittee can begin construction of those storage units. After a permittee receives authorization to construct particular storage units, the permittee may construct those authorized units when it chooses to do so.

When Safety-Kleen originally received Permit No. 50163, the permit authorized (1) total storage capacity of 3,046,624 gallons of waste and (2) construction of specific storage units. Since receiving its original permit, Safety-Kleen has constructed thirty-seven tanks. Forty-seven tanks are still permitted under the current permit but have not yet been constructed.

Safety-Kleen seeks authorization to increase its storage capacity by 25,520 gallons, for a total authorized storage capacity of 3,072,144 gallons. Safety-Kleen does not seek to construct additional storage facilities.

The rules that govern the Safety-Kleen facility have been promulgated to safeguard human health and welfare and the environment by controlling the management of solid waste.¹⁴ Concerns such as projected population growth are not explicitly linked to storage capacity, but the Executive Director prepares permits to comply with the rules. Permittees must comply with the requirements of their permits and the rules. A permittee that fails to comply may be subject to enforcement action.

¹⁴

TEX. HEALTH & SAFETY CODE ANN. § 361.002 (2001).

The Executive Director evaluated the safety measures in the application, including the training program, emergency response plan, and fire suppression system, and determined that the application complies with regulatory requirements.

Comment 9:

Kelly Fincher, Claudia Saltzman, and Stephen Saltzman asked how many expansions are planned in the future.

Response 9:

The Executive Director is not aware of any plans for future expansion.

Impact Study

Comment 10:

Ed Soph commented that the permit should not be renewed until the Executive Director resolves issues affecting the present and future public health and environmental safety of the community. Eva Cadwallader, Mark Sandel, and Carol Soph commented that an environmental impact study needs to be done to determine the effects of a major accident. Ed Soph commented that, although an impact statement is not specifically required, an impact statement needs to be done. Patricia Haworth and Cone Johnson commented that this permit should not be renewed until completion of an impact study. Lisa Rosenberg and Russ Rosenberg asked Safety-Kleen and TCEQ to partner with local residents in completing an independent risk assessment before approving this permit. Pat Gobble commented that she opposes renewal of the permit because there is no environmental impact study about the potential effects of catastrophic spills. Dan Fette commented that he opposes renewal of the permit because there has been no impact study.

Ed Soph commented that renewing a permit originally issued in 1994 does not address the danger the facility would represent when it is fully developed in the year 2011. Ed Soph commented that the permit should not be renewed until an impact assessment is done to determine the effects of a major accident and the costs of mitigation and cleanup

based on the projected population of the area in the year 2011. Dan Fette commented that he opposes renewal of the permit because the permit does not address the dangers to the public in the year 2011.

Response 10:

Safety-Kleen submitted an application for renewal and amendment of its hazardous-waste permit to continue waste-management activities in container storage areas, tanks, and miscellaneous units. TCEQ rules do not require an environmental impact study or public health assessment as part of the technical review of the application.¹⁵

The Texas Solid Waste Disposal Act and TCEQ rules are designed to protect human health and the environment. Safety-Kleen's application and final draft permit must satisfy the statute and the rules, at all levels of storage capacity, now and in the future, regardless of how near or how large local population centers may be. The rules contain detailed emergency response procedures permittees must follow if an emergency occurs. The contingency plan in the application contains details of Safety-Kleen's measures for safety. The rules were drafted and adopted with the goal of regulating waste-management operations so they are protective of human health and the environment.

The Executive Director evaluated the contingency plan and the details related to safety measures in the application. The Executive Director determined that the application complies with regulatory requirements.

¹⁵ The National Environmental Policy Act requires federal agencies to consider the environmental impact of their proposed actions and of reasonable alternatives to those actions. To meet this requirement, federal agencies prepare environmental impact statements. The National Environmental Policy Act does not apply to state actions such as this application for permit renewal and amendment.

Property Values

Comment 11:

Kelly Fincher, Dona Lusk, and Sue Smith asked how expansion of the facility's toxic-waste storage will affect property values and what economic benefits the proposed expansion will bring to the community. Dan Fette opposes renewal of the permit because the community does not know how heavier traffic and increased hazardous-waste capacity will affect property values and opportunities for future residential development. Darlene Collins commented that expanding Safety-Kleen would not benefit the community.

Response 11:

The Legislature established TCEQ's jurisdiction over waste management in the Texas Solid Waste Disposal Act. TCEQ does not have jurisdiction to consider the effects on property values when determining whether to approve or deny an application. The Executive Director's review of the application considers whether the proposed facility complies with the requirements of TCEQ rules.

If Safety-Kleen is issued this permit, the permit would not authorize Safety-Kleen to injure persons, to injure property, to invade property rights, or to infringe upon any state or local law.¹⁶

Traffic and Waste Delivery

Comment 12:

Dan Fette commented that he opposes renewal of the permit because the City of Denton and Denton County have not yet designated hazardous-material routes, and because the roads and rails are already overcrowded. Kelly Fincher, Dona Lusk, and Sue Smith asked which neighborhoods the trains that deliver toxic waste will pass through. Peggy

¹⁶ 30 TEX. ADMIN. CODE § 305.122(c) (2006).

La Point commented that the application should be denied unless potential contamination as a result of the proposed expansion of the rail delivery system is eliminated.

Peggy La Point commented that the application should be denied unless TCEQ requires the most stringent protections against accidental spills from rail cars during delivery to the plant and during downloading of the materials.

Response 12:

The application seeks renewal and amendment of the authority to operate the permitted hazardous-waste management units. TCEQ rules do not require an application of this type to include transportation routes for waste delivery. Hazardous-waste rail transport will use the current rail spur available at Safety-Kleen.

To ensure safety in the loading and unloading areas at the facility, all components (such as tanks and other delivery equipment) are subject to secondary containment requirements.¹⁷ The application contains required emergency response and contingency plans. The final draft permit contains operational procedures, maintenance procedures, and safety procedures to manage potential releases. Safety-Kleen must report any release that may endanger human health or the environment to the Executive Director within twenty-four hours.¹⁸ If a release occurs, Safety-Kleen must immediately begin cleanup and prevent surface-water or groundwater contamination.¹⁹ If the emergency coordinator at the facility determines that state or local emergency response assistance is needed, the emergency coordinator must immediately notify the appropriate state and local agencies.²⁰

¹⁷ Final Draft Permit Prov. V.A.3.

¹⁸ 30 TEX. ADMIN. CODE § 305.125(9) (2006); Final Draft Permit Prov. II.B.4.

¹⁹ Final Draft Permit Prov. III.E.2-3.

²⁰ 40 C.F.R. § 264.56 (2005).

Health and Safety

Comment 13:

Monika Antonelli asked how safe Safety-Kleen is. Mark Sandel asked if the toxic wastes recycled at the facility are dangerous to the thousands of people who live within three miles of the facility. E. Parks Olmon commented that, although the service Safety-Kleen provides is essential, he opposes renewal of the permit because the facility is in a location that risks damage to the health and welfare of the community. Kiersty Stewart commented that the facility processes lead, for which there is no safe level. Joy Powell, Barbara Holladay-Vernon, and Jennie Maples commented about cancer risks. Dan Fette commented that he opposes renewal of the permit because the facility handles wastes that contain carcinogens and toxins. Pat Gobble commented that she opposes renewal of the permit because of the risks involved in hazardous-waste containment. Joy Powell commented that expansion places a high risk on the public.

Response 13:

The final draft permit contains operational, maintenance, and safety procedures to prevent potential releases and to manage any release that occurs. Safety-Kleen must report any release that may endanger human health or the environment to the Executive Director within twenty-four hours.²¹ If a release occurs, Safety-Kleen must immediately begin cleanup and prevent surface-water or groundwater contamination.²²

The final draft permit requires Safety-Kleen to train its staff in the safe handling and management of industrial solid waste and municipal hazardous waste. Safety-Kleen has provided its proposed training plan and listed the emergency response equipment to address potential danger at the facility.

²¹ 30 TEX. ADMIN. CODE § 305.125(9) (2006); Final Draft Permit Prov. II.B.4.

²² Final Draft Permit Prov. III.E.2-3.

The Executive Director evaluated the safety measures in the application, including the training program, emergency response plan, fire suppression system, and contingency plan, and determined that the application complies with regulatory requirements.

Comment 14:

Joan Floyd asked about the effects of a catastrophic accident on the nearby recreational area. Kelly Fincher, Dona Lusk, and Sue Smith asked what measures are in place to protect the children at Hodge Elementary School in the event of an accident. Kelly Fincher, Dona Lusk, and Sue Smith asked about the effects toxic runoff from a catastrophic event may have on soil and the watershed. Kelly Fincher, Claudia Saltzman, Stephen Saltzman, and Mark Sandel asked what hazards the community would face if there is a catastrophic accident. Mark Sandel asked what would happen if a leak caused runoff into Lake Lewisville, and which cities draw water from Lake Lewisville and the Trinity River.

Carol Soph commented that she opposes the application because it does not include information about what may occur after a catastrophic accident. Ed Soph commented that the permit should not be renewed until Safety-Kleen prepares a plan for the worst accidents that could occur. April Kendra and Jim Kendra asked Safety-Kleen to plan for worst-case scenarios and to describe that plan. Kelly Fincher, Dona Lusk, and Sue Smith asked what Safety-Kleen's worst-case scenario is. Dan Fette commented that he opposes renewal of the permit because the City of Denton has no worst-case scenario.

Mark Sandel asked whether the City of Denton is equipped to respond to a catastrophic accident. Kelly Fincher, Dona Lusk, and Sue Smith asked how the increase in capacity would affect the capability of the Denton Fire Department to handle a massive accident. Pat Gobble commented that the Denton Fire Department is not capable of containing a major hazardous-waste accident. Teresa Heffer and Kiersty Stewart commented that water services from the City of Denton do not reach her house and consequently that there is no way to put out a fire.

Mark Sandel asked what additional emergency response resources are needed if the facility expands and how much those resources would cost the City of Denton. Dan Fette asked who would pay for increasing the staff at the fire department.

Response 14:

All waste-management units at the facility are located within a secondary containment system designed to prevent release to the environment if a spill occurs. The container storage areas are completely enclosed and have a reinforced concrete floor with perimeter curbs. The perimeter of the building is surrounded by curbs at least six inches high or by a six-inch roll bump to contain spills within the building and to prevent storm water run-on. The floor of each module is sloped to a sump along the outer wall.

If a release occurs, Safety-Kleen must immediately begin cleanup and prevent surface-water or groundwater contamination.²³ Safety-Kleen must report any release that may endanger human health or the environment to the Executive Director within twenty-four hours.²⁴ Safety-Kleen must investigate the effects of the release and submit a report to TCEQ as required by the facility's contingency plan.²⁵

The Executive Director does not require an applicant to submit information regarding which populations draw water from nearby sources of surface water. The requested information is not part of the Safety-Kleen application.

State and federal regulations do not require the facility's contingency plan to include plans specifically for responding to a catastrophe. The regulations require Safety-Kleen to make arrangements with local authorities (including fire departments, police departments, state and local emergency response teams, emergency response contractors,

²³ Final Draft Permit Prov. III.E.2-3.

²⁴ 30 TEX. ADMIN. CODE § 305.125(9) (2006); Final Draft Permit Prov. II.B.4.

²⁵ Application Section 5 (Mar. 9, 2004). *See also* Final Draft Permit Prov. IX.A.

and equipment suppliers) for handling emergencies.²⁶ Safety-Kleen's contingency plan describes the emergency response procedures (including emergency spill control, fire control, facility evacuation, and emergency coordinators) as well as the appropriate arrangements Safety-Kleen has made with local authorities for assistance in responding to emergencies.²⁷ Safety-Kleen also has detailed procedures on preventing hazards.²⁸

Because the increase in storage capacity is limited, it is not expected that the City of Denton would need to acquire additional resources or that the response capability of the Denton Fire Department would be affected.

The Executive Director evaluated the safety measures in the application and determined that the application complies with regulatory requirements.

Comment 15:

Dan Fette commented that he opposes renewal of the permit because there are no evacuation routes in the event of a catastrophic accident at Safety-Kleen. Barbara Holladay-Vernon commented that traffic on highways cannot move quickly at particular times of the day. Monika Antonelli asked Safety-Kleen and the City of Denton to create an evacuation plan for the 2.4-mile area surrounding the facility.

Teresa Heffer commented that Safety-Kleen should install an alarm system for the 30,000 people located in the 2.4-mile radius around the facility. Kiersty Stewart commented that the community does not have sirens in the event of an accident.

²⁶ 40 C.F.R. § 264.37 (2005).

²⁷ Application Section 5.

²⁸ Application Section 6.

Response 15:

The contingency plan includes an evacuation plan for the facility. The rules do not require the contingency plan to address evacuation routes within the community.

Safety-Kleen has audible alarm systems installed throughout the facility. The rules do not require Safety-Kleen to provide alarm systems or sirens beyond the boundary of the facility.

Safety-Kleen must notify local officials immediately if a release, fire, or explosion at the facility could threaten human health or the environment outside the facility.²⁹ The emergency coordinator at the facility must be available to help local officials decide whether local areas should be evacuated.³⁰ Local officials have the authority to inform the general public.

Comment 16:

Kirk Pendergrass commented that he works at Safety-Kleen, that safety of the environment and of the community is his utmost concern, that he believes Safety-Kleen follows correct procedures, that he would report any wrongdoing at Safety-Kleen, and that he supports renewal of the permit. Jim Waisanen commented that the facility has many programs for protection of employees and the community. Tim Riehl commented that Safety-Kleen continuously trains its staff, has professional and experienced management, maintains equipment properly, adheres to all regulations, and has a safe record. Robert Pitt commented that he works at the facility, that spills and safety are a priority, that a spill is a half cup, and that the staff at Safety-Kleen are the best.

²⁹ Final Draft Permit Prov. II.C.1.k. (referring to 30 TEX. ADMIN. CODE § 335.153); 40 C.F.R. § 264.56 (2005).

³⁰ 30 TEX. ADMIN. CODE § 335.153(1) (2006).

Response 16:

The Executive Director acknowledges receipt of these comments.

Security

Comment 17:

Kelly Fincher, Dona Lusk, and Sue Smith asked how the facility is protected from unauthorized entry and acts of terrorism and what Safety-Kleen's current security procedures are.

Response 17:

The final draft permit and Part B of the application address security requirements for the facility. The facility has an artificial barrier and a twenty-four-hour surveillance system.³¹ The active portions of the facility are secured within a six-foot chain-link fence topped with three strands of barbed wire. Entry to the facility is controlled by security gates.

Comment 18:

Dan Fette commented that he opposes renewal of the permit because security measures at the facility have not been updated since September 11, 2001. Ed Soph commented that security measures to prevent unauthorized entry are inadequate and have not been re-evaluated since 1994. Eva Cadwallader commented that the facility has inadequate protection from illegal entry. Monika Antonelli commented that she opposes renewal of the permit because the facility does not adequately address homeland-security concerns. Ed Soph commented that he opposes renewal of the permit until Safety-Kleen demonstrates that the facility is adequately protected from terrorist attack.

³¹

Response 18:

The safety measures in the final draft permit and in Part B of the application meet the federal regulations. TCEQ rules do not require a demonstration of security against terrorist attack and do not specifically address issues related to homeland security or to the issues that arose after September 11, 2001.

The Executive Director evaluated the security measures in the application and determined that the application complies with regulatory requirements.

Liability Coverage and Financial Assurance

Comment 19:

Peggy La Point commented that the application should be denied unless Safety-Kleen posts a bond large enough to pay for cleanup, environmental remediation, medical bills for injured citizens, and compensation for injured citizens in the event of a major accident.

Kelly Fincher, Dona Lusk, and Sue Smith asked who pays for environmental cleanup, damage to private property, and costs of health effects after an accident.

Response 19:

The facility is responsible for corrective action for any release from a solid-waste management unit.³² TCEQ rules and the final draft permit require Safety-Kleen to maintain liability insurance coverage for bodily injury and property damage to third parties caused by accidents arising from operations at the facility.³³

³² Final Draft Permit Prov. IX.B.

³³ 30 TEX. ADMIN. CODE § 37.6031(b) (2006); Final Draft Permit Prov. VIII.A.

Comment 20:

Monika Antonelli commented that she opposes renewal of the permit because the future of Safety-Kleen is uncertain due to bankruptcy reorganization and loss of key employees.

Response 20:

To protect against the possibility that a permittee may not be able to close its facility, TCEQ rules and draft permits require permittees to provide financial assurance for closing permitted units. Financial assurance mechanisms may be in the form of surety bonds, letters of credit, trust funds, and insurance. Cost estimates for closure are based on permitted units that are full and on the costs of hiring a contractor to conduct the closure. A permittee must also adjust the cost estimate of its financial assurance each year to reflect inflation adjustments.³⁴ If a permittee becomes the subject of a petition for bankruptcy, the permittee must notify the Executive Director.³⁵

Safety-Kleen met the financial assurance requirements by submitting its financial assurance mechanism in Part B of its application.³⁶ In addition, Safety-Kleen met the requirements of the rules by updating its financial assurance coverage to reflect inflation adjustments.³⁷

You may request a copy of Safety-Kleen's current financial assurance mechanism by contacting TCEQ's Revenue Section, Financial Administration Division, at (512) 239-0300.

³⁴ 30 TEX. ADMIN. CODE § 37.131 (2006).

³⁵ 30 TEX. ADMIN. CODE §§ 305.125(22), 37.71(a) (2006); Final Draft Permit Prov. VIII.B.

³⁶ Final Draft Permit Prov. VII.B. (requiring Safety-Kleen to provide financial assurance for closure of the permitted units that would be covered by the permit); Application Part B.

³⁷ Safety-Kleen last updated its financial assurance mechanism for the Denton facility on June 14, 2006.

Nuisance

Comment 21:

Darlene Collins commented that she has submitted complaints to the authorities about odor she believes originates at Safety-Kleen. Joy Powell commented that the facility creates problems with noise.

Response 21:

TCEQ rules require Safety-Kleen to operate the facility in a manner that does not create nuisance conditions.³⁸ Complaints regarding odor should be directed to TCEQ's Region 4 Office in Fort Worth at (817) 588-5800. TCEQ also maintains a twenty-four-hour hotline at (888) 777-3186. When Region 4 receives a complaint, staff conduct an investigation. You can request a copy of an investigation report by calling the Region 4 Office.

For information on TCEQ's odor complaint investigation procedures, interested persons are encouraged to visit TCEQ's Web site at

http://www.tceq.state.tx.us/compliance/complaints/protocols/odor_protodf.html.

TCEQ does not have authority over problems with noise. Concerns regarding noise should be directed to local authorities.

The Executive Director evaluated the application and the compliance history for Safety-Kleen and for the facility and determined that the application complies with regulatory requirements.

Comment 22:

Edward Wittmis commented that he has worked near the facility for twenty years, that he lives near the facility, that he has been passing the facility several times a week, and that he has never noticed odor or other problems from Safety-Kleen.

Response 22:

The Executive Director acknowledges receipt of this comment.

Water Quality

Comment 23:

Kiersty Stewart commented that the water table the community shares may be the same water table under Safety-Kleen. Barbara Holladay-Vernon commented about the effects on the lake from water pollution that may or may not be attributed to Safety-Kleen.

Response 23:

The first groundwater zone at the facility occurs at a depth of about fifteen feet and flows to the southeast. Soils at the site have moderate to low permeability, which describes the speed that water moves through soil. Because groundwater moves toward the southeast, water wells located downgradient (i.e., southeast) of the facility could potentially be impacted in the event that a release reaches groundwater. The facility is about 2,000 feet from Cooper Creek, which drains into Lake Lewisville. A release of liquid wastes at the site could potentially migrate to Lake Lewisville.

The safety measures at the facility comply with regulations and make the possibility of a release unlikely for several reasons.

First, if the final draft permit is issued, the permit would authorize Safety-Kleen to manage waste only in aboveground tanks. The permit would not authorize land disposal at the facility, and waste would not come in contact with soil.

Second, a licensed professional engineer evaluated and approved the tank designs and specifications. Safety-Kleen must keep the tanks in good condition and inspect the tanks regularly.

Third, all tanks and container storage areas are located within a secondary containment system, which prevents any release outside the containment area. Potential releases from containers and tanks would flow into the secondary containment system. The sumps in the secondary containment system would remove the waste. Safety-Kleen must promptly remove the waste from the sumps and reclaim that waste or dispose of the waste off-site.

Fourth, to avoid possible enforcement action, Safety-Kleen must manage the wastes at its facility in a manner that prevents spills, as required under the rules and under the final draft permit.

Air Quality

Comment 24:

Barbara Holladay-Vernon commented about the health effects of air pollution related to a copper plant, Safety-Kleen, cars, and fireplaces. Kelly Fincher, Dona Lusk, and Sue Smith asked what the effects on the air would be and what air monitoring would be in place after an accident. Joy Powell commented that she has had to breathe perchloroethylene and cresylic acid vapors from the facility.

Jim Waisanen commented that the facility has a large emission control system that collects air emissions, sends the emissions through a treatment unit, and destroys the emissions.

Response 24:

In addition to the facility's hazardous-waste permit, TCEQ regulates the facility's compliance with the Texas Clean Air Act under the facility's air permit. Safety-Kleen's air permit addresses issues such as air pollution, air modeling, air monitoring, and emission control. The issues related to Safety-Kleen's air permit and air pollution issues

related to a copper plant, cars, and fireplaces, are outside the scope of review for this application.

Safety-Kleen's application seeks authorization to continue to receive, store, and process industrial hazardous and nonhazardous wastes. The final draft permit falls under state and federal regulations that govern industrial solid waste and municipal hazardous waste, and some of those regulations address particular air emission standards for process vents, equipment leaks, tanks, and containers at waste-management facilities. The final draft permit addresses those particular air emission standards.³⁹ The final draft permit requires Safety-Kleen to operate the facility in a manner that does not cause or contribute to air pollution. In addition, the compliance plan describes the procedures Safety-Kleen must follow in the event of an emergency.

Complaints regarding air emissions may be reported to TCEQ's Region 4 Office in Fort Worth at (817) 588-5800. TCEQ also maintains a twenty-four-hour hotline at (888) 777-3186.

Compliance History and Inspections

Comment 25:

Alan Kajihara asked TCEQ to consider, in its evaluation of this application, the penalties TCEQ and the U.S. Environmental Protection Agency assessed against Safety-Kleen in making a decision on this application. Carol Soph asked that Safety-Kleen's compliance history with U.S. Environmental Protection Agency be included in making a decision on this application. Monika Antonelli commented that she opposes renewal of the permit because of the facility's history of federal violations. Kelly Fincher, Dona Lusk, and Sue Smith asked what the accident record at the facility is.

³⁹ Final Draft Permit Prov. X (requiring Safety-Kleen to comply with 30 TEX. ADMIN. CODE § 335.152(a)(17)-(19), which refers to compliance with 40 C.F.R. Part 264, Subparts AA, BB, and CC.).

Barbara Holladay-Vernon commented that it sounds like Safety-Kleen is trying to do the best it knows how to do, but the effort seems insufficient because violations have occurred. Barbara Holladay-Vernon commented that all systems can fail, and everyone makes mistakes. Monika Antonelli commented that she opposes renewal of the permit because there were nineteen fires at the facility between October 1992 and November 2004.

Response 25:

During technical review of an application, the Executive Director prepares a compliance history for the applicant and the facility. The compliance history covers the five-year period immediately preceding the date the Executive Director receives the application.⁴⁰ The compliance history contains multimedia components that include the following: enforcement orders; court judgments; consent decrees; criminal violations; chronic excessive-emissions events; investigation dates; notices of violations; dates of letters regarding audits and violations disclosed under the Texas Environmental, Health, and Safety Audit Privilege Act; environmental management systems; voluntary on-site compliance assessments; voluntary pollution-reduction programs; and early compliance with state or federal environmental requirements.⁴¹

A facility may have one of the following classifications:

High	above-average compliance,
Average by Default	classification for sites that have never been investigated,
Average	general compliance, or
Poor	below-average compliance. ⁴²

⁴⁰ 30 TEX. ADMIN. CODE § 60.1(b) (2006).

⁴¹ 30 TEX. ADMIN. CODE § 60.1(c) (2006).

⁴² 30 TEX. ADMIN. CODE § 60.2(a) (2006).

The Executive Director prepared and reviewed the facility's compliance history during the period from 1999 through 2004. The Safety-Kleen Denton Recycling Center has a site classification of average and a company classification of average. The company classification is the average of the ratings for all sites Safety-Kleen owns in Texas. All notices of violations with TCEQ have been resolved.

In response to requests from commentors, the Executive Director also reviewed Safety-Kleen's compliance history with the U.S. Environmental Protection Agency. That compliance history includes information from the past three years.

The Executive Director determined that Safety-Kleen's compliance history does not warrant denial of this application.

Comment 26:

Jennie Maples asked when the facility's last compliance evaluation inspection was, how the public can get a copy of those results, and what follow-up Safety-Kleen takes after inspections.

April Kendra and Jim Kendra asked Safety-Kleen to provide a detailed description of how it evaluates causes and consequences of incidents that have occurred and to provide examples of corrections to procedures Safety-Kleen made as a result.

Response 26:

The date of the last Compliance Evaluation Inspection was May 17, 2005. To request a copy, contact TCEQ's Records Services at (512) 239-0900. After an inspection, if there are violations, TCEQ inspectors provide the facility a list of the violations and the steps needed to resolve the violations.

Comment 27:

Peggy La Point commented that the application should be denied unless TCEQ makes frequent and unannounced inspections of the facility.

Response 27:

Region 4 staff conduct investigations as resources allow. In the past, this facility has typically been investigated once every two years, and the visits have been announced. Region staff respond to all complaints with unannounced investigations.

Request for Public Meeting

Comment 28:

Dan Fette and Delores Olmon asked for another public meeting because questions at the public meeting were not answered.

Eva Cadwallader commented that she opposes renewal of the permit and expansion because Safety-Kleen's answers to many questions were inadequate. Dan Fette and Delores Olmon commented that they oppose renewal of the permit because Safety-Kleen did not provide specific answers at the public meeting.

Response 28:

TCEQ rules set forth the purpose of a public meeting as the opportunity to take formal public comments for the record on an application.⁴³ An applicant for a hazardous-waste permit must attend a public meeting held by the Executive Director.

The Executive Director held two public meetings on this application: the first, on December 13, 2004; the second, on March 28, 2006. The Executive Director held the second public meeting in response to requests from the public and from local elected officials, asking the Executive Director to hold a second public meeting.

⁴³

30 TEX. ADMIN. CODE § 55.154(a) (2006).

Although the rules do not require a public meeting to include an informal question-and-answer period, both public meetings included a question-and-answer period, in addition to the time allotted for taking formal public comments for the record. At both meetings, members of the public asked questions of Safety-Kleen and of TCEQ staff. At both meetings, members of the public expressed dissatisfaction with some responses from Safety-Kleen.

A public meeting is not a contested case hearing.⁴⁴ TCEQ cannot deny an application because of public dissatisfaction with responses during the informal question-and-answer period at a public meeting.

If someone requests a contested case hearing on this application, and if the Commissioners grant the request and refer this application for further proceedings in a contested case hearing, parties in the case will have the opportunity of participating in a formal discovery period.⁴⁵ Discovery is the formal opportunity for parties to request information, material, admissions to facts, and other discoverable matter from other parties. Each party that receives a discovery request must respond.⁴⁶

The Executive Director determined that two public meetings were appropriate for receiving formal comments from the public.

Comment 29:

Tim Riehl of Safety-Kleen commented that Safety-Kleen did not have all of its files and records at the meeting and offered to provide information to interested persons.

⁴⁴ 30 TEX. ADMIN. CODE § 55.154(a) (2006).

⁴⁵ 1 TEX. ADMIN. CODE § 155.31 (2006).

⁴⁶ TEX. R. CIV. P. 193.1.

Response 29:

The Executive Director acknowledges receipt of this comment.

Public Participation and Appeal

Comment 30:

Gregory Thiele and Heidi Thiele asked whether TCEQ considers the desires of the residents living near the facility when evaluating the application, or whether TCEQ evaluates only whether the application complies with Texas law.

Response 30:

In evaluating this application, the Executive Director follows state and federal law and regulations that apply to Safety-Kleen's application. State and federal regulations require the Executive Director to consider public comment as part of the application review process.

The public has the opportunity to submit written comments on proposed draft permits during the public comment period. The public may also provide oral comments during public meetings. Public comments may lead the Executive Director to revise draft permits to resolve specific concerns.

Affected persons who seek further opportunities to affect the decision on the application may also request a contested case hearing.⁴⁷ If the Commissioners grant a request for contested case hearing, the Commissioners will refer the case to the State Office of Administrative Hearings, which is an independent state agency that presides over contested matters that arise at many state agencies. During the contested case hearing process, parties may argue their cases before an administrative law judge, who presides over the proceedings.

⁴⁷

30 TEX. ADMIN. CODE § 55.201(b) (2006).

Parties in a contested case may also participate in mediation before or during the contested case hearing process.⁴⁸ Mediation has been effective in helping parties resolve disputes.

Comment 31:

Gregory Thiele and Heidi Thiele asked whether the application can be contested, whether the decision on the application could be appealed, and who would argue on behalf of parties opposing the application.

Response 31:

The procedure for seeking to change the decision on the application will depend on whether the Executive Director or the Commissioners make the decision on this application. The sequence of events begins with the period for requesting a contested case hearing.

Between now and the deadline for requesting a hearing, affected persons and the applicant may request a contested case hearing on this application. The deadline for requesting a hearing is thirty days after TCEQ's Chief Clerk mails out this response to comments.

If no one submits a timely request for hearing, or if all timely requests for hearing are subsequently withdrawn, this application will be considered uncontested, and the Executive Director will make the decision to grant or deny this application. After the Executive Director makes a decision, the Office of the Chief Clerk will mail out notice of the Executive Director's action on the application.

⁴⁸ Both TCEQ's Alternative Dispute Resolution program and the State Office of Administrative Hearings provide mediation services at no additional cost to parties. More information regarding alternative dispute resolution may be found at TCEQ's Web site at www.tceq.state.tx.us/ by clicking the link for Dispute Resolution and at the State Office of Administrative Hearings Web site at www.soah.state.tx.us/.

A person who seeks to change the Executive Director's decision may file with the Chief Clerk a motion to overturn the Executive Director's decision. The motion must be filed within twenty-three days after the date the Chief Clerk mails out the notice of the Executive Director's action.⁴⁹ The motion to overturn may be set before the Commissioners at a regularly scheduled Agenda meeting, at which the Commissioners may grant or deny the motion.

The process for seeking to change the Executive Director's decision on the application ends here.

If TCEQ receives a request for hearing, this application will be considered contested, and the Commissioners will make the decision to grant or deny this application.

If the Commissioners deny a request for hearing, the person who filed the request will have an opportunity to file a motion for rehearing on the request.

If the Commissioners grant a request for hearing, the Commissioners will refer the application to the State Office of Administrative Hearings, an independent state agency that presides over contested matters that arise in many state agencies. An administrative law judge would be assigned to preside over the contested case hearing process.

The parties in the contested case would include the applicant, the Office of the Public Interest Counsel, and persons affected by the application. The Executive Director may also be a party.

Parties who opposed issuance of the permit could be individuals or groups of persons who are affected by the application, whose hearing requests have been granted, and who have been named by the administrative law judge as a party. The administrative law judge may also name other affected persons as parties. A person who wishes to be a

⁴⁹ 30 TEX. ADMIN. CODE § 50.139(b) (2006).

party to a case must appear in person or by representative at the preliminary hearing and seek to be admitted as a party.⁵⁰

A group or association that seeks party status must meet three requirements. First, the group or association must have at least one member who would otherwise have standing as an affected person in his or her own right. Second, the interests the group or association seeks to protect as a party in the case must be interests that are germane to the organization's purpose. And third, the group or association's claim in the case and the relief it seeks cannot require participation of individual members in the case.⁵¹

A private individual may choose to represent himself or herself in the contested case hearing process or may designate a representative.⁵² A representative does not need to be a lawyer but may be required to prove he or she has the authority to act on behalf of an individual. A group or association must designate one person who will be responsible for the official communications and documents for the group.⁵³ Any party may retain a lawyer.

At the end of the contested case hearing process, the administrative law judge will issue a proposal for decision, which is a recommendation to the Commissioners on how to act on the application. The Commissioners will make a decision on the administrative law judge's proposal—either to adopt the entire proposal, to adopt part of the proposal with changes, or to substitute a different decision.

A party who seeks to change the Commissioners' decision may file a motion for rehearing. If the motion for rehearing is denied, and when the decision by the Commissioners becomes final, the party who filed the motion for rehearing may file an appeal of the Commissioners' decision in Travis County District Court.

⁵⁰ 30 TEX. ADMIN. CODE § 80.109(a) (2006).

⁵¹ 30 TEX. ADMIN. CODE § 55.205(a) (2006).

⁵² 30 TEX. ADMIN. CODE § 80.113(a) (2006).

⁵³ 30 TEX. ADMIN. CODE § 55.201(d) (2006).

Other

Comment 32:

Kelly Fincher, Dona Lusk, and Sue Smith asked for the location, storage capacity, and security procedures of Safety-Kleen's largest storage facility in the United States.

Response 32:

The Executive Director does not require an applicant to provide locations or storage capacity information for facilities that are not the subject of the pending application. The requested information is not part of the application.

Comment 33:

Gregory Thiele and Heidi Thiele asked if denial of the application would result in closure of the facility, or if the facility would continue to operate as it currently does.

Response 33:

If the Commissioners deny the application, the facility will be required to cease operations and close all permitted hazardous-waste management units as required under the approved closure plans.

It is also possible that the Commissioners may approve the application with changes to the final draft permit. If that occurs, the facility would be able to operate only within the parameters of the issued permit.

Comment 34:

Gregory Thiele and Heidi Thiele asked what the environmental and economic impact would be if the facility closed.

Response 34:

Closure plans are plans for closing waste-management units in a way that protects human health and the environment. Safety-Kleen must submit closure plans for all solid-waste management units, and TCEQ must approve the plans for closure to proceed. TCEQ would review the facility's closure plan to ensure that all permitted hazardous-waste management units are properly closed.

The economic impact of closing the facility is beyond the scope of review for this application.

Comment 35:

Jennie Maples, Mark Sandel, and Dawn Swepston commented that they oppose renewal of the permit. Edward B. Soph commented that the permit should not be renewed and the major amendment should not be granted as currently written.

Response 35:

TCEQ approves or denies permit applications based on an applicant's adherence to state and federal requirements. An application can be denied if it raises significant technical or regulatory concerns.

Comment 36:

Morgan Smith provided a copy of an article entitled, "Staying Healthy in a Toxic World," from *Organic Style*.⁵⁴ The article discusses how chemicals have worked their way into the blood streams, cells, and brains of human beings.

⁵⁴

Susan Freinkel, *Staying Healthy in a Toxic World*, *Organic Style* 43-48 (May 2004).

Kelly Fincher provided a copy of an article entitled, "Explosion, fire hit chemical plant," from the *Dallas Morning News*.⁵⁵ The article describes an explosion and fire at Marcus Oil & Chemical, a business located in the Houston area.

Response 36:

The Executive Director acknowledges receipt of these articles.

Comment 37:

Tim Riehl commented that Safety-Kleen provides an environmental service desired by many citizens and provides a benefit to society. Jim Waisanen commented that the government and communities demand the service Safety-Kleen offers and that Safety-Kleen provides a valuable service.

Jim Waisanen commented that waste is not disposed of at the Safety-Kleen facility and that waste is stored an average of less than two weeks. Jim Waisanen commented that the current permit does not allow storage longer than a year and that the materials are brought in, managed, and moved out.

Jim Waisanen commented that Safety-Kleen invites anyone to visit the plant for a tour.

Sherry Collins commented that she has worked at the facility for eighteen years; that Safety-Kleen has been at its location for thirty years, before residential development in the area; and that she supports immediate approval of the renewal of the permit. John W. Johnson commented that it was not until after the facility was established that development occurred in the area, and it is unfair to complain that development is near the facility.

Kirk Pendergrass commented that TCEQ should renew Safety-Kleen's permit because he believes Safety-Kleen's current procedures are correct and that Safety-Kleen strives to improve its performance. Bryan Evans commented that he works at and lives near

⁵⁵ Associated Press, *Explosion, fire hit chemical plant*, Dallas Morning News 12A (Dec. 4, 2004).

Safety-Kleen, that he knows the people do their best to follow federal and state regulations and to be as safe as possible, that if he believed there was danger he would not live in Denton with his family, and that he supports granting the renewal and expansion. John W. Johnson commented that he had no problem with expansion provided Safety-Kleen follows regulations.

Jeff Krueger commented that during the time he served on the City Council, School Board, and Commissioners Court, as well as during the time he worked with Fire Marshal's Office, he never heard a complaint about Safety-Kleen.

John Remley commented that he supports renewal of the permit. Jeff Krueger commented that Safety-Kleen should be allowed to expand. Edward Wittmis commented that he believes Safety-Kleen runs a good operation.

Response 37:

The Executive Director acknowledges receipt of these comments.

IV. Conclusion

No changes to the final draft permit have been made in response to public comment.

On September 23, 2005, the Executive Director filed the final draft permit. That document contained two word-processing errors. The Executive Director has corrected these errors, and the corrected pages are filed with this Response to Public Comment.⁵⁶

The first error appeared on page 15, in Provision III.E.2. Five words were accidentally omitted at the end of the sentence. The Executive Director has corrected that omission, and the sentence now reads as follows:

The permittee shall immediately initiate clean-up procedures for removal of any spilled hazardous or industrial nonhazardous wastes and waste residues and shall take all steps necessary to prevent surface-water or groundwater contamination as a result of any spills.

The second error appeared in Table V.C. This table was paginated incorrectly to indicate that the table contained nine sheets instead of eight. The pagination has been corrected to reflect that the table contains a total of eight sheets.

Respectfully submitted,
Texas Commission on Environmental
Quality

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Certificate of Service

I certify that on September 27, 2006, the "Executive Director's Response to Public Comment" for the application by Safety-Kleen Systems, Inc., for renewal and amendment of IHW Permit No. 50163, was filed with the Office of the Chief Clerk at the Texas Commission on Environmental Quality.


Dawn Burton

TEXAS
COMMISSION
ON ENVIRONMENTAL
QUALITY

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CHIEF CLERKS OFFICE

Attachment A

[III.E.]

2. The permittee shall immediately initiate clean-up procedures for removal of any spilled hazardous or industrial nonhazardous wastes and waste residues and shall take all steps necessary to prevent surface-water or groundwater contamination as a result of any spills.
3. Collected hazardous or industrial nonhazardous wastes, spills, leaks, clean-up residues, and contaminated rainfall runoff, including contaminated stormwater from the drainage control system(s) associated with the permitted units, shall be removed promptly after the spillage and/or rainfall event in as timely a manner as is necessary to prevent overflow of the system by the following method(s):
 - a. Removal to an on-site authorized facility unit;
 - b. Removal to an authorized industrial solid waste management facility or authorized off-site facility; or
 - c. Discharge in accordance with a wastewater/stormwater discharge permit.
4. The permittee shall ensure that any equipment or vehicles which have come in contact with waste in the loading/unloading, storage, processing, and/or disposal areas have been decontaminated prior to their movement into designated uncontaminated areas of the site property. At a minimum, all contaminated equipment shall be externally decontaminated and contaminated vehicles shall have their undercarriages and tires or tracks decontaminated to remove all waste residues and to prevent contamination of uncontaminated areas. All wash water generated shall be collected and disposed of in accordance with Provision III.E.3.
5. Preparedness and Prevention
 - a. At a minimum, the permittee shall equip the facility as set forth in Table III.E.3.- Emergency Equipment, as required by 40 CFR 264.32.
 - b. All sumps, pumps, fire- and spill-control equipment, decontamination equipment, and all other equipment and structures authorized or required through the Contingency Plan shall be tested and maintained, as necessary, to assure its proper operation in time of emergency, as required by 40 CFR 264.33.
 - c. The permittee shall maintain access to the communications or alarm system, as required by 40 CFR 264.34.
 - d. A trained emergency coordinator shall be available at all times in case of an emergency and will have the responsibility for coordinating all emergency response measures as required by 40 CFR 264.55 and 264.56. Emergency number(s) shall be posted in all waste management portions of the facility and all employees in those areas shall be trained in the location of those postings.

TABLE V.C TANKS AND TANK SYSTEMS

No.	Tank	N.O.R. Unit #	Storage and/or Processing	Waste No.s ¹	Rated Capacity	Dimensions	Containment Volume (including rainfall for unenclosed areas)	Unit Will Manage Ignitable, Reactive, or Incompatible Waste (State all that apply)
1	Tank 1	Prop.	X	1, 2, 3, 4, 5, 6, 7, 8, 9, 10, 12, 13, 14, 16, 17, 20, 21	18,500 gal.	Dia=10.5' H=32'	113,860 gal.	I
2	Tank 2	Prop.	X	"	18,500 gal.	Dia=10.5' H=32'	113,860 gal.	I
3	Tank 3	Prop.	X	"	18,500 gal.	Dia=10.5' H=32'	113,860 gal.	I
4	Tank 4	Prop.	X	"	18,500 gal.	Dia=10.5' H=32'	113,860 gal.	I
5	Tank 5	Prop.	X	"	18,500 gal.	Dia=10.5' H=32'	113,860 gal.	I
6	Tank 6	Prop.	X	"	18,500 gal.	Dia=10.5' H=32'	113,860 gal.	I
11	Tank 11	Prop.	X	"	18,500 gal.	Dia=10.5' H=32'	113,860 gal.	I
12	Tank 12	031	X	"	20,000 gal.	Dia=10.5' H=32'	113,860 gal.	I
13	Tank 13	Prop.	X	"	15,000 gal.	Dia=10.5' H=24'	113,860 gal.	I
14	Tank 14	032	X	"	15,000 gal.	Dia=10.5' H=24'	113,860 gal.	I

¹from Table IV.B, first column

TABLE V.C TANKS AND TANK SYSTEMS

No.	Tank	N.O.R. Unit #	Storage and/or Processing	Waste No.s ¹	Rated Capacity	Dimensions	Containment Volume (including rainfall for unenclosed areas)	Unit Will Manage Ignitable, Reactive, or Incompatible Waste (State all that apply)
16	Tank 16	Prop.	X	1, 2, 3, 4, 5, 6, 7, 8, 9, 10, 12, 13, 14, 16, 17, 20, 21	18,500 gal.	Dia=10.5' H=32'	113,860 gal.	I
17	Tank 17	005	X	"	15,000 gal.	Dia=10.5' H=24'	113,860 gal.	I
18	Tank 18	006	X	"	20,000 gal.	Dia=10.5' H=32'	113,860 gal.	I
19	Tank 19	007	X	"	20,000 gal.	Dia=10.5' H=32'	113,860 gal.	I
20	Tank 20	008	X	"	20,000 gal.	Dia=10.5' H=32'	113,860 gal.	I
21	Tank 21	Prop.	X	"	18,500 gal.	Dia=10.5' H=32'	113,860 gal.	I
22	Tank 22	033	X	"	15,000 gal.	Dia=10.5' H=32'	113,860 gal.	I
25	Tank 25	009	X	"	15,000 gal.	Dia=10.5' H=24'	113,860 gal.	I
26	Tank 26	Prop.	X	"	18,500 gal.	Dia=10.5' H=32'	113,860 gal.	I
27	Tank 27	010	X	"	15,000 gal.	Dia=10.5' H=24'	113,860 gal.	I

¹from Table IV.B, first column

TABLE V.C TANKS AND TANK SYSTEMS

No.	Tank	N.O.R. Unit #	Storage and/or Processing	Waste No.s ¹	Rated Capacity	Dimensions	Containment Volume (including rainfall for unenclosed areas)	Unit Will Manage Ignitable, Reactive, or Incompatible Waste (State all that apply)
28	Tank 28	011	X	1, 2, 3, 4, 5, 6, 7, 8, 9, 10, 12, 13, 14, 16, 17, 20, 21	15,000 gal.	Dia=10.5' H=24'	113,860 gal.	I
29	Tank 29	012	X	"	15,000 gal.	Dia=10.5' H=24'	113,860 gal.	I
30	Tank 30	013	X	"	15,000 gal.	Dia=10.5' H=24'	113,860 gal.	I
31	Tank 31	Prop.	X	"	18,500 gal.	Dia=10.5' H=32'	113,860 gal.	I
32	Tank 32	014	X	"	15,000 gal.	Dia=10.5' H=24'	113,860 gal.	I
33	Tank 33	015	X	"	15,000 gal.	Dia=10.5' H=24'	113,860 gal.	I
34	Tank 34	016	X	"	15,000 gal.	Dia=10.5' H=24'	113,860 gal.	I
35	Tank 35	017	X	"	15,000 gal.	Dia=10.5' H=24'	113,860 gal.	I
36	Tank 36	Prop.	X	"	18,500 gal.	Dia=10.5' H=32'	36,053 gal.	I
37	Tank 37	Prop.	X	"	18,500 gal.	Dia=10.5' H=32'	36,053 gal.	I

¹from Table IV.B, first column

TABLE V.C TANKS AND TANK SYSTEMS

No.	Tank	N.O.R. Unit #	Storage and/or Processing	Waste No.s ¹	Rated Capacity	Dimensions	Containment Volume (including rainfall for unenclosed areas)	Unit Will Manage Ignitable, Reactive, or Incompatible Waste (State all that apply)
38	Tank 38	Prop.	X	1, 2, 3, 4, 5, 6, 7, 8, 9, 10, 12, 13, 14, 16, 17, 20, 21	18,500 gal.	Dia=10.5' H=32'	36,053 gal.	I
39	Tank 39	Prop.	X	"	18,500 gal.	Dia=10.5' H=32'	36,053 gal.	I
40	Tank 40	Prop.	X	"	18,500 gal.	Dia=10.5' H=32'	36,053 gal.	I
41	Tank 41	Prop.	X	"	18,500 gal.	Dia=10.5' H=32'	36,053 gal.	I
42	Tank 42	Prop.	X	"	18,500 gal.	Dia=10.5' H=32'	36,053 gal.	I
43	Tank 43	Prop.	X	"	18,500 gal.	Dia=10.5' H=32'	36,053 gal.	I
44	Tank 44	Prop.	X	"	18,500 gal.	Dia=10.5' H=32'	36,053 gal.	I
45	Tank 45	Prop.	X	"	18,500 gal.	Dia=10.5' H=32'	36,053 gal.	I
46	Tank 46	Prop.	X	"	18,500 gal.	Dia=10.5' H=32'	36,053 gal.	I
47	Tank 47	Prop.	X	"	18,500 gal.	Dia=10.5' H=32'	36,053 gal.	I

¹from Table IV.B. first column

TABLE V.C TANKS AND TANK SYSTEMS

No.	Tank	N.O.R. Unit #	Storage and/or Processing	Waste No.s ¹	Rated Capacity	Dimensions	Containment Volume (including rainfall for unenclosed areas)	Unit Will Manage Ignitable, Reactive, or Incompatible Waste (State all that apply)
48	Tank 48	034	X	1, 2, 3, 4, 5, 6, 7, 8, 9, 10, 12, 13, 14, 16, 17, 20, 21	18,500 gal.	Dia=10.5' H=32'	36,053 gal.	I
49	Tank 49	035	X	"	18,500 gal.	Dia=10.5' H=32'	36,053 gal.	I
50	Tank 50	036	X	"	18,500 gal.	Dia=10.5' H=32'	36,053 gal.	I
51	Tank 51	037	X	"	18,500 gal.	Dia=10.5' H=32'	36,053 gal.	I
52	Tank 52	Prop.	X	"	18,500 gal.	Dia=10.5' H=32'	36,053 gal.	I
53	Tank 53	Prop.	X	"	18,500 gal.	Dia=10.5' H=32'	36,053 gal.	I
54	Tank 54	Prop.	X	"	18,500 gal.	Dia=10.5' H=32'	36,053 gal.	I
55	Tank 55	Prop.	X	"	18,500 gal.	Dia=10.5' H=32'	36,053 gal.	I
56	Tank 56	Prop.	X	"	18,500 gal.	Dia=10.5' H=32'	36,053 gal.	I
57	Tank 57	Prop.	X	"	18,500 gal.	Dia=10.5' H=32'	36,053 gal.	I

¹from Table IV.B, first column

TABLE V.C TANKS AND TANK SYSTEMS

No.	Tank	N.O.R. Unit #	Storage and/or Processing	Waste No.s ¹	Rated Capacity	Dimensions	Containment Volume (including rainfall for unenclosed areas)	Unit Will Manage Ignitable, Reactive, or Incompatible Waste (State all that apply)
58	Tank 58	Prop.	X	1, 2, 3, 4, 5, 6, 7, 8, 9, 10, 12, 13, 14, 16, 17, 20, 21	18,500 gal.	Dia=10.5' H=32'	36,053 gal.	I
59	Tank 59	Prop.	X	"	18,500 gal.	Dia=10.5' H=32'	36,053 gal.	I
60	Tank 60	023	X	"	18,500 gal.	Dia=10.5' H=32'	36,053 gal.	I
61	Tank 61	024	X	"	18,500 gal.	Dia=10.5' H=32'	36,053 gal.	I
62	Tank 62	025	X	"	18,500 gal.	Dia=10.5' H=32'	36,053 gal.	I
63	Tank 63	026	X	"	18,500 gal.	Dia=10.5' H=32'	36,053 gal.	I
64	Tank 64	027	X	"	18,500 gal.	Dia=10.5' H=32'	36,053 gal.	I
65	Tank 65	028	X	"	18,500 gal.	Dia=10.5' H=32'	36,053 gal.	I
66	Tank 66	029	X	"	18,500 gal.	Dia=10.5' H=32'	36,053 gal.	I
67	Tank 67	030	X	"	18,500 gal.	Dia=10.5' H=32'	36,053 gal.	I

¹from Table IV.B, first column

TABLE V.C TANKS AND TANK SYSTEMS

No.	Tank	N.O.R. Unit #	Storage and/or Processing	Waste No.s ¹	Rated Capacity	Dimensions	Containment Volume (including rainfall for unenclosed areas)	Unit Will Manage Ignitable, Reactive, or Incompatible Waste (State all that apply)
68	Tank 68	Prop.	X	1, 2, 3, 4, 5, 6, 7, 8, 9, 10, 12, 13, 14, 16, 17, 20, 21	100,000 gal.	Dia=22' H=36'	150,108 gal.	I
69	Tank 69	Prop.	X	"	100,000 gal.	Dia=22' H=36'	150,108 gal.	I
70	Tank 70	Prop.	X	"	100,000 gal.	Dia=22' H=36'	150,108 gal.	I
89	Tank 89	Prop.	X	"	39,500 gal.	Dia=13.5' H=43.3'	70,259 gal.	I
90	Tank 90	Prop.	X	"	39,500 gal.	Dia=13.5' H=43.3'	70,259 gal.	I
91	Tank 91	Prop.	X	"	39,500 gal.	Dia=13.5' H=43.3'	70,259 gal.	I
92	Tank 92	Prop.	X	"	39,500 gal.	Dia=13.5' H=43.3'	70,259 gal.	I
93	Tank 93	Prop.	X	"	39,500 gal.	Dia=13.5' H=43.3'	70,259 gal.	I
94	Tank 94	Prop.	X	"	39,500 gal.	Dia=13.5' H=43.3'	70,259 gal.	I
95	Tank 95	Prop.	X	"	39,500 gal.	Dia=13.5' H=43.3'	70,259 gal.	I

¹from Table IV.B, first column

TABLE V.C TANKS AND TANK SYSTEMS

No.	Tank	N.O.R. Unit #	Storage and/or Processing	Waste No.s ¹	Rated Capacity	Dimensions	Containment Volume (including rainfall for unenclosed areas)	Unit Will Manage Ignitable, Reactive, or Incompatible Waste (State all that apply)
96	Tank 96	Prop.	X	1, 2, 3, 4, 5, 6, 7, 8, 9, 10, 12, 13, 14, 16, 17, 20, 21	39,500 gal.	Dia=13.5' H=43.3'	70,259 gal.	I
97	Tank 97	Prop.	X	"	18,500 gal.	Dia=10.5' H=32'	28,139 gal.	I
98	Tank 98	Prop.	X	"	18,500 gal.	Dia=10.5' H=32'	28,139 gal.	I
99	Tank 99	Prop.	X	"	18,500 gal.	Dia=10.5' H=32'	28,139 gal.	I
100	Tank 100	Prop.	X	"	18,500 gal.	Dia=10.5' H=32'	28,139 gal.	I
111	Tank 111	019	X	"	20,000 gal.	Dia=10.5' H=32'	26,539 gal.	I
112	Tank 112	020	X	"	20,000 gal.	Dia=10.5' H=32'	26,539 gal.	I
113	Tank 113	021	X	"	10,000 gal.	Dia=10.5' H=24'	26,539 gal.	I
114	Tank 114	095	X	"	6,000 gal.	Dia=10' H=10'	26,539 gal.	I
131	E. Day Tank	102	X	"	2,500 gal.	Dia=7' H=15.5'	19,488 gal.	I

¹from Table IV B, first column

Attachment E
Map

Safety-Kleen Systems, Inc., IHW Permit No. 50163
 TCEQ Docket No. 2006-1904-IHW
 Commission Agenda, March 19, 2008



Texas Commission on Environmental Quality
 GIS Team (Mail Code 197)
 P.O. Box 13087
 Austin, Texas 78711-3087

January 3, 2008

0 0.1 0.2 0.4 Miles

Projection: Texas Statewide Mapping System
 (TSMS)

Scale 1:25,136

1 inch equals 0.397 miles

Legend

- Facility
- Requestors
- 1-Mile Radius

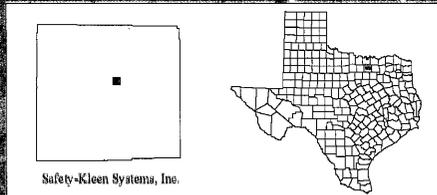
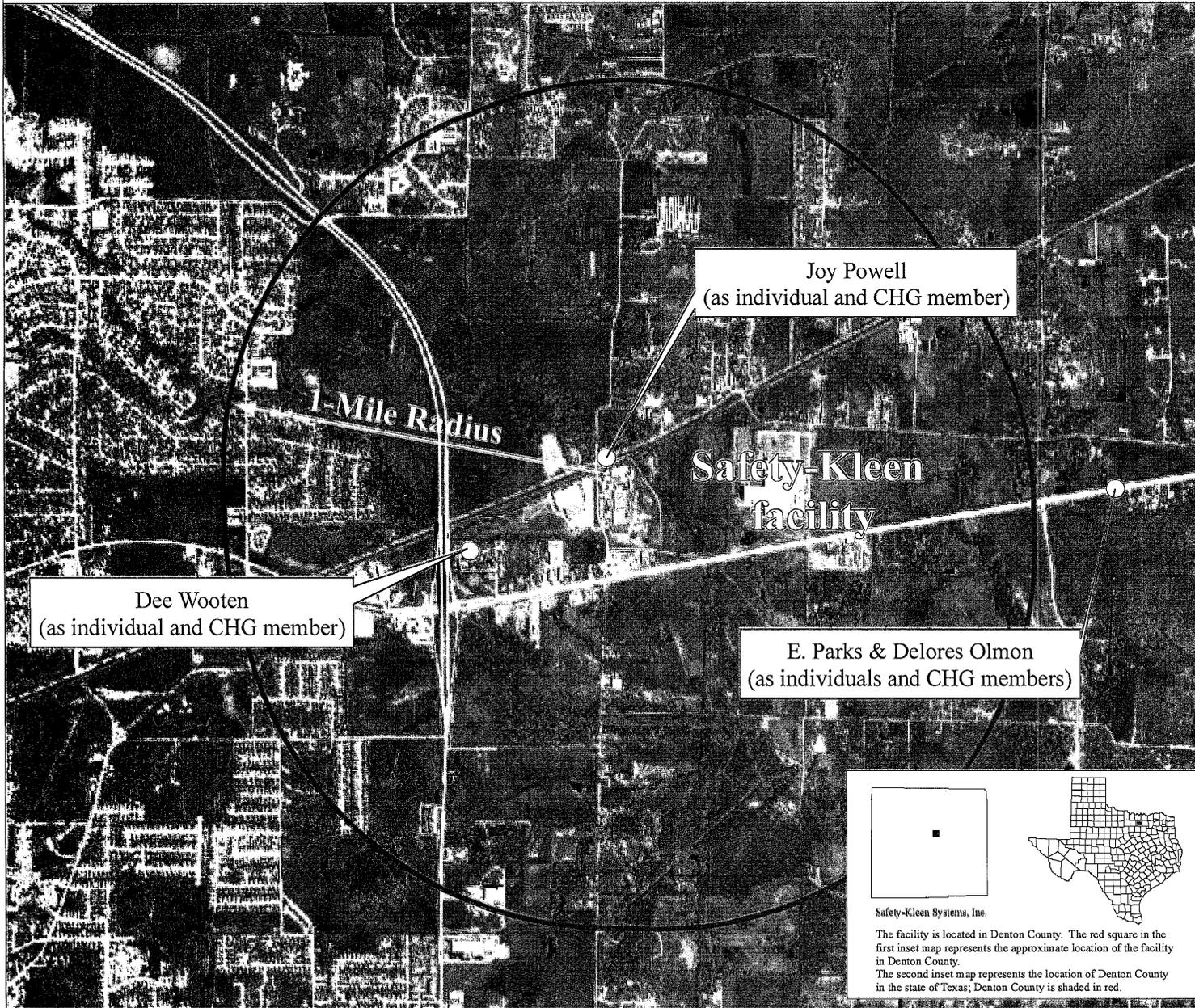
Source: TCEQ's Office of Legal Services (OLS) provided the location of the facility and requestors. OLS obtained the location information for the facility from the applicant and the location information for the requestors from the requestors. The locations of the requestors were obtained by geocoding methods. The counties are U.S. Census Bureau 1992 TIGER/Line Data (1:100,000). The background of this map is a 2001 source photograph from the North Texas Council of Governments.

This map depicts the following:

- (1) The approximate location of the facility. This is labeled "Safety-Kleen facility."
- (2) The approximate locations of the requestors.
- (3) A circle and arrow depicting the 1-mile radius from the approximate boundary of the facility. This is labeled "1-Mile Radius."



This map was generated by the Information Resources Division of the Texas Commission on Environmental Quality. This map was not generated by a licensed surveyor, and is intended for illustrative purposes only. No claims are made to the accuracy or completeness of the data or to its suitability for a particular use. For more information concerning this map, contact the Information Resource Division at (512) 239-0800.



Safety-Kleen Systems, Inc.

The facility is located in Denton County. The red square in the first inset map represents the approximate location of the facility in Denton County.

The second inset map represents the location of Denton County in the state of Texas; Denton County is shaded in red.