

Texas Commission on Environmental Quality

INTEROFFICE MEMORANDUM

To: Office of Chief Clerk **DATE:** April 15, 2024

From: Diane Goss and Audrey Liter
Staff Attorneys
Environmental Law Division

Subject: Backup Documents Filed for Consideration of Hearing Requests at Agenda.

Applicant: US Ecology Texas, Inc.

Proposed Permit No.: 50052

Program: Office of Waste, Waste Permits Division

Docket No.: TCEQ Docket No. 2024-0576-IHW

Agenda Date: May 10, 2024

Enclosed please find a copy of the following documents for inclusion in the background material for this permit application:

- Draft Class 3 Modification of Permit No. 50052
- Technical Summary and Executive Director's Preliminary Decision Permit No. 50052
- Compliance History Report 2023_07_10 Permit No.50052
- Executive Director's Response to Public Comment Permit No. 50052

Attachment A:

Draft Class 3 Modification of Permit No. 50052

Texas Commission on Environmental Quality



Class 3 Permit Modification

Permittee Name	US Ecology Texas, Inc.	Hazardous Waste Permit No.	50052
City	Robstown	County	Nueces
Customer No.	CN603247974	Solid Waste Registration No.	50052
Regulated Entity No.	RN101445666	EPA Identification No.	TXD069452340
Application Date	November 21, 2022	Application Received Date	November 28, 2022
Request	Class 3 Modification	Tracking No.	28084303

The above permit is modified as follows:

Continuation Sheet 8 of 76

Section I.B. Incorporated Application Materials

Section I.B. is revised as follows:

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 June 3, 2009, July 23, 2009, January 15, 2010, March 31, 2010, October 21, 2010, April 12, 2011, and July 15, 2011, the Application Elements listed in "Attachment C", and the following amendments/modifications to the permit, which are hereby approved subject to the terms of this permit and any other orders of the Texas Commission on Environmental Quality (TCEQ):

Permit Modification/ Amendment	Application Date/ Revision Date¹	Description of Change
Class 2 modification	October 31, 2013	Remove Special Permit Provision XII.A that restricts hours of operation at the facility from the permit.
Class 1 modification	August 22, 2014	To update the emergency coordinator list in the Contingency Plan.

Permit Modification/ Amendment	Application Date/ Revision Date¹	Description of Change
Class 2 modification	August 22, 2014	<ol style="list-style-type: none"> 1. Addition of two uncovered storage areas (Permit Unit Nos. 9-5 and 9-6) for the permitted Uncovered Container Storage Area (Permit Unit No. 9) without increasing the capacity of the unit. 2. Realignment of two storm water flumes of the Cell 48 multilayer final cover system without changing dimensions, specifications, or materials of construction of storm water flumes or the final cover system.
Class 1 modification	February 3, 2016, Revised March 3, 2016	To update the emergency coordinator list in the Contingency Plan.
Class 3 modification	September 20, 2013, Revised November 12, 2013, May 2, 2014, January 21, 2015, September 28, 2015, November 5, 2015, and April 18, 2016	<ol style="list-style-type: none"> 1. To authorize the addition of four (4) new wastewater tanks, one (1) new miscellaneous unit (Oil Reclamation Facility Thermal Desorption Unit) and associated twenty-two (22) tanks. 2. To update Inspection Schedule, Contingency Plan, Waste Analysis Plan, Engineering Report, Closure Plan, and Financial Assurance due to addition of new waste management units.
Class 1 modification	September 9, 2016	To update the Table III.E.1 - Arrangements with Local Authorities in the Contingency Plan
Class 1 modification	December 29, 2016	To update Table III.E.3 - Emergency Equipment in the Contingency Plan.
Class 1 ¹ modification	February 20, 2017, Revised March 23, 2017	To change the location of the main facility entrance and to update the emergency coordinator list in the Contingency Plan.

Permit Modification/ Amendment	Application Date/ Revision Date ¹	Description of Change
Class 3 modification	September 1, 2015, Revised October 19, 2015, May 12, 2016, December 13, 2016, April 27, 2017, May 17, 2017, and October 19, 2017	<ol style="list-style-type: none"> 1. To authorize areal expansion of facility boundary by adding a 233 Acres tract of land (Mayo Tract). 2. To add 2 new landfill cells 51 and 52. 3. To update Facility Siting Criteria. 4. To revise Facility Management Reports and Plans (Inspection Schedule, Security, Contingency Plan, etc.), Engineering Report, Geology, Groundwater Detection Monitoring Plan, Closure and Post- Closure Plan, and Financial Assurance due to facility expansion.
Class 2 modification	October 2, 2017, Revised October 31, 2017	<ol style="list-style-type: none"> 1. To increase the container storage capacity in the permitted Uncovered Waste Storage Area (Permit Unit No. 9) from 4,000 cubic yards to 5,285 cubic yards. 2. To revise permit Table V.B. - Container Storage Area and Table VII.E.1. - Permitted Unit Closure Costs Estimate.
Class 2 modification	January 26, 2018, Revised March 8, 2018	<ol style="list-style-type: none"> 1. To add two container storage areas (Permit Units No. 9-7 and 9-8) in the permitted Uncovered Waste Storage Area (Permit Unit No. 9) without increasing the container capacity of the unit. 2. To revise permit Table V.B. - Container Storage Area and Attachment D.1.- Authorized Permitted Units.
Class 1 modification	April 30, 2018	<ol style="list-style-type: none"> 1. To upgrade the piping that is connected to four RCRA permitted wastewater storage tanks at the facility: tanks M-6, S-1; S-2, and M-3 designated as TCEQ Permit Unit Numbers 5, 6, 7 and 10. 2. Typographical corrections to Table V.B and Attachment D.

Permit Modification/ Amendment	Application Date/ Revision Date ¹	Description of Change
Class 2 modification	November 26, 2018, Revised February 04, 2019	<ol style="list-style-type: none"> 1. Add an additional container storage area (Unit 9- 9) to the permitted Uncovered Waste Storage Areas (Permit Unit No. 9) without increasing the container capacity of the unit. 2. Revisions to permit Table V.B. - Container Storage Area, Table VII.E.1. - Permitted Unit Closure Cost Summary, and Attachment D - List of Permitted Facility Units. 3. Revisions to design drawings to the Stabilization Building treatment pans, Mixing Tank MT-1 (East) and Mixing Tank MT-2 (West) (Permit Unit Nos. 11 and 12). 4. Revisions to Permit Table III.D. - Inspection Schedule to remove the laboratory wastewater accumulation tank from the inspection schedule. 5. Remove Observation Wells MW-UTZ-04A, MW-UTZ- 05A, MW-UTZ-06A and MW-UTZ-07A. 6. Addition of new Point of Compliance Well MW- UTZ-22A. 7. The revision of Table VI.B.3.b. including: <ol style="list-style-type: none"> a. Add note that proposed wells will be 2” or greater diameter; b. Add note regarding background; and c. Add note that existing wells may be extended to account for new embankments which will affect parameters in Table VI.B.3.b such as top of casing elevation. 8. The revision of Attachment F including: <ol style="list-style-type: none"> a. Add note to clarify background determination; and b. Adjust map symbology and notes to indicate that MW-UTZ-01A and B, MW-UTZ-09A and B, MW-UTZ-13A and B, and MW-UTZ-16A and B are two co-located wells.

Permit Modification/ Amendment	Application Date/ Revision Date ¹	Description of Change
Class 1 modification	April 2, 2019	<ol style="list-style-type: none"> 1. Replace roof and sidewalls of Permit Unit No. 3 (Controlled Parking/Storage Building 1-East side) to repair some damages. Replacements will be of same dimensions, specifications, and materials as the original building design. 2. Update Contingency Plan Table III.E.2. with personnel changes and contact information.
Class 1 modification	September 10, 2019	<ol style="list-style-type: none"> 1. Update Contingency Plan Table III.E.2 with personnel changes and contact information. 2. Update Emergency Equipment Table III.E.3 with addition of fire suppression/prevention system upgrade to the listed emergency equipment.
Class 1 modification	September 18, 2019	To include utilization of leachate collection and leak detection pipes with alternate Standard Dimension Ratio for Landfill Cells 51 and 52. The modification meets the requirements of 30 TAC 305.69 (K)(A)(3) for equipment replacement or upgrading with functionally equivalent components.
Class 1 modification	December 05, 2019	<ol style="list-style-type: none"> 1. Update the status of Landfill Cells 51-1 and 51-2 from proposed to active, Revisions to permit Table V.G.1. - Landfills, Table VII.E.1. - Permitted Unit Closure Cost Summary, Table VII.E.2. - Permitted Unit Post-Closure Cost Summary, and Attachment D- List of Permitted Facility Units in the permit. 2. Update Contingency Plan Table III.E.2. with personnel changes and contact information.
Class 1 modification	March 20, 2020, Revised March 28, 2020	To remove closed unit Tank SL-1 (Permit Unit No. 15, NOR Unit No. 26) and update corresponding Tables as included in detail below.
Class 1 ¹ modification	April 20, 2020	To relocate deep well pumps (pre injection units) to the new location adjacent to the current location with elevated containment and piping to improve the operation of the pumps during rainfall events.

Permit Modification/ Amendment	Application Date/ Revision Date ¹	Description of Change
Class 1 modification	October 22, 2020, Revised November 3, 2020	Update Contingency Plan Table III.E.2 with personnel changes and contact information.
Class 2 modification	September 14, 2020	<ol style="list-style-type: none"> 1. Revise groundwater detection monitoring program to add new Point of Compliance (POC) well MW- UTZ-23A in lieu of POC well MW-UTZ-03A. Remove POC well MW-UTZ-03A from the detection monitoring program. 2. Adjust locations of previously proposed POC wells. 3. Add construction details for POC wells MW-UTZ- 08A, MW-UTZ-09A, MW-UTZ-09B which were installed in June 2019. 4. Modifies Sampling and Analysis Plan. 5. Update Table VI.B.3.b. - Unit Groundwater Detection Monitoring System, and Attachment F - Groundwater Detection Monitoring System Map in the permit.
Class 1 modification	May 25, 2021	Update Contingency Plan Table III.E.2 with personnel changes and contact information.
Class 3 modification	December 15, 2021 Revised January 19, 2021, May 4, 2021, September 24, 2021, November 18, 2021	<p>Revise permit to address new Alternate Cover System (ACS) for Landfill cells 50, 51, and 52.</p> <ol style="list-style-type: none"> 1. Revise Inspection Schedule to include inspection requirements for ACS. 2. Revise Engineering Report, Table V.G.1 - Landfills, to address ACS and to increase rated capacity for landfill Cells 51 and 52. 3. Revise closure and post-closure plan to address ACS. 4. Revise Table VII.E.1.- Closure Cost Estimates and Table VII.E.2 -Post-Closure Cost Estimates to address cost estimates.

Permit Modification/ Amendment	Application Date/ Revision Date ¹	Description of Change
Class 1 modification	December 1, 2021	<ol style="list-style-type: none"> 1. Informational changes to Closure/Post-closure Plan to update permitted tank unit number. 2. Update tank unit status from proposed to active for permitted tanks T-37, T-40, T-41, WT-4. 3. Update Contingency Plan Table III.E.2 with personnel changes and contact information. 4. Change general manager contact name, information and signatory authority. 5. Provide proof of deed recordation for Cells 51 and 52.
Class 1 modification	January 24, 2022	Update Contingency Plan Notification List, Table III.E.2 with personnel changes and contact information.
Class 1 Modification	March 31, 2022	<ol style="list-style-type: none"> 1. Update Table III.E.1 - Arrangements with Local Authorities to address changes to agencies identified in the Contingency Plan. 2. Update Table III.E.2 - Contingency Plan Notification List with personnel changes and contact information. 3. Update facility map Drawing III.E.1 - Evacuation Routes and Emergency Equipment to add Uncovered Waste Storage Area (Permit Unit No. 9- 9) and make it easier to read. 4. Repair and upgrade Pressure Vacuum Relief Valve and Rupture Disk for Permitted Tanks T-16 (Permit Unit No. 31) and T-17 (Permit Unit No. 32).
Class 1 modification	August 18, 2022, Revised August 22, 2022	<ol style="list-style-type: none"> 1. Update permit tank unit status from proposed to active for permitted tanks WT-1, WT-2, WT-3, T- 42, T-43. 2. Revise Table VII.E.1.- Closure Cost Estimates to update cost estimates.

Permit Modification/ Amendment	Application Date/ Revision Date ¹	Description of Change
Class 2 Modification	July 26, 2022	<ol style="list-style-type: none"> 1. Update Waste Analysis Plan (WAP) to revise waste feed characteristics for Low Volatile Metals (LVM), Semi Volatile Metals (SVM), and Mercury due to 2019 Compliance Demonstration Test results. 2. Update Table V.K.3 - Miscellaneous Unit Maximum Constituent Feed Rates to revise Operating Parameter Limits (OPLs) for LVM and SVM from 105 lb/hr to 169 lb/hr, and to increase Mercury OPL from 0.6 lb/hr to 5.18 lb/hr.
Class 3 Modification	November 21, 2022, Revised December 21, 2022, February 28, 2023, April 19, 2023, and May 23, 2023	<ol style="list-style-type: none"> 1. Increase the permitted container storage capacity for Permit Unit No. 9, from the current 5,285 cubic yards to 6,897 cubic yards. 2. Add waste codes for acceptance in Tanks WT-1, WT-2, and WT-3 (Permit Unit Nos. 20-22) to match the list for the T-40 tank series. Add a subset of these waste codes to WT-4 (Permit Unit No. 23). 3. Add 22 (twenty-two) new Deepwell tanks. Four of the tanks are proposed for construction near the landfill Cell Area. 18 (eighteen) of the tanks are proposed for construction in a new Deepwell Tank farm. 4. Add a new shredder unit ("Shredder") to support thermal desorber unit operations (Permit Unit No. 46). 5. Reformat information provided in permit tables to comply with current TCEQ format requirements.

These materials are incorporated into this permit by reference as if fully set out herein. Any and all revisions to these elements shall become conditions of this permit upon the date of approval by the Commission.

Section V.K. Miscellaneous Units is revised to incorporate new Shredder Unit. The provisions are renumbered by revising Provision V.K.1 as the introductory paragraph and adding subtitles and renumbering the following provisions.

Section V.K. Miscellaneous Units

The miscellaneous units and the approved waste types are shown in Table V.K.1 -

Miscellaneous Units. The permittee is authorized to operate the miscellaneous units for processing subject to the limitations contained herein.

Provision V.K.1 is added as an Introductory Provision.

Thermal Desorber Unit:

1. The permittee shall operate Thermal Desorber Unit subject to the limitations contained herein. The conditions and limitations of this subsection and its associated tables apply to the miscellaneous units unless otherwise noted.

There are no changes to Provisions V.K.2 through V.K.8.

Provision V.K.9. is added to incorporate new Shredder Unit.

Shredder Unit:

9. The permittee is authorized to operate the shredder unit for processing of wastes, subject to the limitations contained herein.
 - a. The permittee shall not place hazardous waste in the shredder unit if they could cause the unit, its ancillary equipment, or a containment system to rupture, leak, corrode, or otherwise fail.
 - b. The shredder unit shall only be used for processing wastes and shall not be used for storage of hazardous wastes.
 - c. The permittee shall inspect the unit in accordance with the requirements in Table III.D. - Inspection Schedule.
 - d. The permittee shall use appropriate controls and practices to prevent spills and overflows from the unit or containment system.
 - e. The permittee shall report to the executive director within twenty-four (24) hours of detection when a leak or spill occurs from the unit or secondary containment system to the environment. (A leak or spill of one pound or less of hazardous waste that is immediately contained and cleaned-up need not be reported.)- (Releases that are contained within a secondary containment system need not be reported.)
 - f. When managing ignitable, reactive, and incompatible wastes, the permittee shall comply with 40 CFR 264.17 and requirements specified in the Shredder Engineering Report which is adopted by reference in Permit Section I.B.
 - g. The permittee must comply with the requirements of 40 CFR Part 264, Subpart AA, BB, and CC, as applicable when managing hazardous wastes.

VII.B. Financial Assurance for Closure

Provision VII.B.1 is revised to update financial assurance for closure:

A. 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 as shown on 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 30 TAC Section 335.179. Financial assurance is subject to the following:
 1. Adjustments to Financial Assurance Amount

1. At least sixty (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 existing units, may be reduced by the amount listed in Table VII.E.1. - Permitted Unit Closure Cost Summary, upon certification of closure of an existing permitted unit, in accordance with Provisions VII.A.4. and VII.A.6., and upon written approval of the Executive Director.
2. Annual Inflation Adjustments
- (1) 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.

Tables:

Table III.D. Inspection Schedule

Replace existing Table III.D. with the revised Table III.D.(Attached)

Table V.B. Container Storage Areas

Replace existing Table V.B. with the revised Table V.B.(Attached)

Table V.C. Tanks and Tank Systems

Replace existing Table V.C. with the revised Table V.C. (Attached)

Table V.K.1. Miscellaneous Units

Replace existing Table V.K.1.with the revised Table V.K.1. (Attached)

Table VII.E.1. Unit Cost Closure Cost Summary

Replace existing Table VII.E.1. with the revised Table VII.E.1. (Attached)

Attachments:

Attachment B Facility Map and Drawings

Replace Page 1 of 23 of the Attachment B with the revised Attachment B Page 1 of 23 (Attached)

Attachment D List of Permitted Facility Units

Replace existing Attachment D with the revised Attachment D (Attached)

Permit No. 50052
Permittee: US Ecology Texas, Inc.

Sheet 11 of 11

This Class 3 Permit Modification is part of Permit No. 50052 and should be attached thereto.

Issued Date:

For the Commission

Table III.D- Inspection Schedule

Facility Unit(s) and Basic Elements	Possible Error, Malfunction, or Deterioration	Frequency of Inspection ¹
Deepwell Pretreatment and Groundwater Recovery Tank Farms	Improper functioning of overfill prevention controls; Tank corrosion; Erosion or signs of releases of hazardous waste (e.g., wet spots, dead vegetation); Visible cracks, holes, or gaps in fixed roofs and closure devices; Broken, cracked, or otherwise damaged seals or gaskets in closure devices; Broken or missing hatches, access covers, caps, or other closure devices.	Daily
Mixing Tanks	Improper functioning of overfill prevention controls; Tank corrosion; Erosion or signs of releases of hazardous waste (e.g., wet spots, dead vegetation); Visible cracks, holes, or gaps in fixed roofs and closure devices; Broken, cracked, or otherwise damaged seals or gaskets in closure devices; Broken or missing hatches, access covers, caps, or other closure devices.	Daily
Oil Reclamation Facility Tanks	Improper functioning of overfill prevention controls; Tank corrosion; Erosion or signs of releases of hazardous waste (e.g., wet spots, dead vegetation); Visible cracks, holes, or gaps in fixed roofs and closure devices; Broken, cracked, or otherwise damaged seals or gaskets in closure devices; Broken or missing hatches, access covers, caps, or other closure devices.	Daily
Oil Reclamation Facility Containment Pad	Gaps, cracks, or structural defects in containment system base; Spilled or leaked waste and accumulated precipitation in secondary containment; Spilled or leaked waste in loading/unloading areas; Signs of hazardous waste release surrounding pad (i.e., wet spots, dead vegetation).	Weekly

Table III.D- Inspection Schedule

Facility Unit(s) and Basic Elements	Possible Error, Malfunction, or Deterioration	Frequency of Inspection ¹
Security Fence: Active	Unauthorized entry; Damage or vandalism to site fencing; Improperly secured and/or monitored gates.	Daily
Security Fence: Post-Closure	Unauthorized entry; Damage or vandalism to site fencing; Improperly secured and/or monitored gates.	Quarterly
Safety Signs: Active	Missing, damaged or vandalized signs that read "Danger- Unauthorized Personnel Keep Out".	Daily
Safety Signs: Post-Closure	Missing, damaged or vandalized signs that read "Danger- Unauthorized Personnel Keep Out".	Quarterly
Two-Way Radios	Inoperable radios; Radios unavailable for emergency communication.	Daily
Portable Water Tank	Insufficient water; Portable tank unavailable for fire control.	Daily
Fire Extinguishers, Safety Showers, Eyewash Stations	Inoperable equipment; Equipment unavailable for emergency use.	Monthly
Personal Protective Equipment (PPE); First Aid Supplies; Decontamination, Spill Control and Response Equipment	Inadequate supply of equipment; Equipment inoperable or damaged.	Monthly
Container Storage Building	Poor condition of containers (e.g., severe rusting, apparent structural defects, leaking); Open containers; Improperly labeled containers; Inadequate aisle space; Gaps, cracks, or structural defects in containment system base; Spilled or leaked waste and accumulated precipitation in secondary containment; Spilled or leaked waste in loading/unloading areas; Signs of hazardous waste release surrounding building (e.g., wet spots, dead vegetation).	Weekly

Table III.D- Inspection Schedule

Facility Unit(s) and Basic Elements	Possible Error, Malfunction, or Deterioration	Frequency of Inspection ¹
Oil Reclamation Facility Containers	Poor condition of containers (e.g., severe rusting, apparent structural defects, leaking); Open containers; Improperly labeled containers; Inadequate aisle space.	Weekly
Controlled Truck Storage Areas	Leakage; Improper placarding of trailers; Insecure landing gear; Improperly secured tarps; Cracks, deterioration, or presence of liquids on containment structure; Poor housekeeping.	Weekly
Waste Stabilization/Bulk Stabilization Building	Gaps, cracks, or structural defects in containment system base; Spilled or leaked waste and accumulated precipitation in secondary containment; Spilled or leaked waste in loading/unloading areas; Signs of hazardous waste release surrounding building (e.g., wet spots, dead vegetation); Gaps, cracks, or structural defects in the stabilization vessel.	Weekly
Landfill: Construction and Active Cells	Significant erosion of cover; Ineffective run-on/run-off control systems; Damaged or uncapped sump riser; Presence of standing water; Liner damage; Wind dispersal problems; Improperly covered bulk material; Inoperable leachate collection and removal system.	Weekly, after storms of 0.5" or more
Landfill: Closed Cells	Significant erosion of cap; Ineffective run- on/run-off controls; Inoperable leachate collection and removal system.	Weekly, after storms of 0.5" or more
Landfill: Post-Closure	Significant erosion or settlement of final cover and perimeter berms; Ineffective run- on/run-off controls; Damaged riser pipes; Erosion or siltation of stormwater drainage system.	Quarterly
Leachate Collection System: Post-Closure	Improper pump operations; Liquid Levels in sumps.	Monthly

Table III.D- Inspection Schedule

Facility Unit(s) and Basic Elements	Possible Error, Malfunction, or Deterioration	Frequency of Inspection ¹
Landfill Leak Detection Collection System Sump; Active and Closure	Presence of leachate.	Weekly
Landfill Leak Detection Collection System Sump; Post-Closure	Improper pump operation; Presence of leachate.	Monthly (unless a reduced frequency is allowed under 40 CFR 264.303(c)(2))
Monitoring Wells and Equipment	Deterioration or cracks in riser, riser lid, grout or well casing; Tampered seal or lock; Inoperable pumps or equipment; Missing identification number.	Quarterly
Permanent Benchmark; Post-Closure	Damage.	Every 5 years
Oil Reclamation Facility Miscellaneous Unit TDU and Thermal Oxidizer (T.O.)	Presence of leaks, spills, fugitive emissions and signs of tampering of pumps, valves, conveyors, and pipes.	Daily
Oil Reclamation Facility Miscellaneous Unit TDU and T.O.	Malfunction of TDU automatic waste feed cutoff (AWFCO) system and associated alarms.	At least once per scheduled maintenance outage, (at least 12 times per year)
Oil Reclamation Facility T.O.	Faulty readings from TDU purge vent flow meter (FT-101), as well as the future distillation unit process vent flow meter, and the combustion chamber temperature monitor of the T.O. (TT-121).	Daily
Oil Reclamation Facility Closed-Vent System and T.O.	Detectable emissions from the closed-vent system components and connections exceed regulatory limits.	Annual
Oil Reclamation Facility Closed-Vent System and T.O.	Defects in the closed vent system that could result in air pollutant emissions.	Quarterly

Table III.D- Inspection Schedule

Facility Unit(s) and Basic Elements	Possible Error, Malfunction, or Deterioration	Frequency of Inspection ¹
Oil Reclamation Facility Pumps, Valves, Pressure Relief Devices, Flanges and Other Connectors	Monitored within 5 days by the method specified in 40 CFR 264.1063(b) if evidence of a potential leak is found by visual, audible, olfactory, or any other detection method. For listed equipment that contains or contacts hazardous waste (or hazardous secondary materials) with organic concentrations of at least 10 percent by weight.	As indicated
Oil Reclamation Facility Miscellaneous Unit TDU and T.O.	Exceedance of the hourly rolling average parameters for TT-121, KY-110, OE-1, and FE-101.	Weekly
Subpart AA Process Vents - 40 CFR 264.1033: Process Vent: Future Distillation Unit	An initial and annual leak check will be done on the closed-vent system to ensure no emissions are present. Monitoring will be completed to demonstrate no detectable emission in accordance with Reference Method 21 in 40 CFR 60 as per requirements of 40 CFR Section 264.1036(b) and Section 265.1036(b). The scope of monitoring shall include all piping connections, filters, valves, and blowers associated with the distillation unit process vent.	Initially/Annually
Subpart AA Process Vents - 40 CFR 264.1033: Control Device: Thermal Oxidizer (T.O.)	Monitoring will be conducted to assure that the T.O. performs at high efficiency and achieves consistent control. Continuous monitoring shall include temperature monitor at a location in the combustion chamber downstream of the combustion zone, and a process vent gas flow rate meter.	Daily

Table III.D- Inspection Schedule

Facility Unit(s) and Basic Elements	Possible Error, Malfunction, or Deterioration	Frequency of Inspection ¹
Subpart AA Process Vents - 40 CFR 264.1033: Control Device: Carbon Adsorption System (CAS)	Review to confirm that the carbon media in the distillation unit process vent backup carbon adsorber has been replaced with fresh carbon at the regular predetermined time interval that is less than the design carbon replacement interval.	Monthly
Subpart AA Process Vents - 40 CFR 264.1033: Control Devices	A visual inspection will be completed on the control device. The visual inspection shall include inspection of ductwork, piping, and connections to covers and control devices for evidence of visible defects such as holes in ductwork or piping and loose connections.	Quarterly
Oil Reclamation Facility Equipment Subject to 40 CFR Part 61 Subpart FF - National Emission Standard for Benzene Waste Operations: Process Vent Bypass	Check that vapors are being routed to the thermal oxidizer.	Daily
Oil Reclamation Facility Equipment Subject to 40 CFR Part 61 Subpart FF - National Emission Standard for Benzene Waste Operations: Carbon Adsorption System	Review to confirm that carbon media in the tank vent backup carbon adsorber has been replaced with fresh carbon at the regular predetermined time interval that is less than the design carbon replacement interval.	Monthly
Oil Reclamation Facility Equipment Subject to 40 CFR Part 61 Subpart FF - National Emission Standard for Benzene Waste Operations: Closed-Vent System and Control Devices	A visual inspection will be completed on the closed vent systems and control devices. The visual inspection shall include inspection of ductwork, piping, and connections to covers and control devices for evidence of visible defects such as holes in ductwork or piping and loose connections.	Quarterly

Table III.D- Inspection Schedule

Facility Unit(s) and Basic Elements	Possible Error, Malfunction, or Deterioration	Frequency of Inspection ¹
Oil Reclamation Facility Equipment Subject to 40 CFR Part 61 Subpart FF - National Emission Standard for Benzene Waste Operations: Tanks	A visual inspection will be completed on tanks. A visual inspection will be completed on roofs, seals, access doors, and all other openings to ensure that no cracks or gaps exist. Each opening will be maintained in a closed, sealed position at all times that the tank is holding waste except when it is necessary to open it for waste sampling or removal, equipment inspection, maintenance, or repair.	Quarterly
Oil Reclamation Facility Equipment Subject to 40 CFR Part 61 Subpart FF - National Emission Standard for Benzene Waste Operations: Oil-water Separators	A visual inspection will be completed on cover seals, access hatches, and all other openings to ensure that no cracks or gaps are present. Each opening will remain in a closed, sealed position at all times that the waste is in the oil water separator unless it is being opened for waste sampling or removal, equipment inspection, maintenance, or repair.	Quarterly
Oil Reclamation Facility Equipment Subject to 40 CFR Part 61 Subpart FF - National Emission Standard for Benzene Waste Operations: Treatment processes	A visual inspection will be completed on treatment process seals, access doors, and all openings to ensure that no cracks or gaps are present. All openings shall be sealed and kept closed all the time waste is being treated except during inspection or maintenance.	Quarterly
Oil Reclamation Facility Equipment Subject to 40 CFR Part 61 Subpart FF - National Emission Standard for Benzene Waste Operations: Containers	A visual inspection will be completed on covers and all openings to ensure that they are closed and gasketed properly. All openings shall be maintained in a closed, sealed position at all times that the waste is in the container except when opening for waste loading, removal, inspection, or sampling.	Quarterly

Table III.D- Inspection Schedule

Facility Unit(s) and Basic Elements	Possible Error, Malfunction, or Deterioration	Frequency of Inspection ¹
Oil Reclamation Facility Equipment Subject to 40 CFR Part 61 Subpart FF - National Emission Standard for Benzene Waste Operations: Closed-Vent Systems	An annual leak check will be done on the closed-vent systems. Monitoring will be completed to demonstrate no detectable emissions as indicated by an instrument reading of less than 500 ppmv above background by methods specified in 61.355(h). The scope of monitoring shall include all piping connections, filters, valves, and blowers in the process vent and tank vent systems.	Annual
Oil Reclamation Facility Equipment Subject to 40 CFR Part 61 Subpart FF - National Emission Standard for Benzene Waste Operations: Tanks	An annual leach check will be done on all covers and openings of tanks to ensure their operations are emission free. Monitoring will be completed to demonstrate no detectable emissions as indicated by an instrument reading of less than 500 ppmv above background by methods specified in 40 CFR 61.355(h). Monitoring will be performed on access hatches, sampling ports, gauge wells, etc. Each opening will be maintained in a closed, sealed position at all times that the tank is holding waste except when it is necessary to open it for waste sampling or removal, equipment inspection, maintenance or repair.	Annual
Oil Reclamation Facility Equipment Subject to 40 CFR Part 61 Subpart FF - National Emission Standard for Benzene Waste Operations: Oil Water Separators	An annual leak inspection is required for oil water separators to ensure their operation is emission free. Monitoring will be completed to demonstrate no detectable emissions as indicated by an instrument reading of less than 500 ppmv above background by the methods specified in 40 CFR 61.355(h). Monitoring will be performed on covers and all other openings. Each opening will remain in a closed, sealed position at all times that the waste is in the oil water separator unless it is being opened for waste sampling or removal, equipment inspection, maintenance, or repair.	Annual

Table III.D- Inspection Schedule

Facility Unit(s) and Basic Elements	Possible Error, Malfunction, or Deterioration	Frequency of Inspection ¹
Oil Reclamation Facility Equipment Subject to 40 CFR Part 61 Subpart FF - National Emission Standard for Benzene Waste Operations: Treatment Process	An annual inspection is required for treatment process to ensure their operations are emission free. Monitoring will be completed to demonstrate no detectable emission as indicated by an instrument reading of less than 500 ppmv above background by methods specified in 40 CFR 61.355(h). Monitoring will be performed on covers and all other openings. All openings shall be sealed and kept closed at all times the waste is being treated except during inspections or maintenance.	Annual
Oil Reclamation Facility Equipment Subject to 40 CFR Part 61 Subpart FF - National Emission Standard for Benzene Waste Operations: Containers	An annual leak inspection is required for containers. Monitoring will be completed to demonstrate no detectable emissions as indicated by an instrument reading of less than 500 ppm above background by methods specified as 40 CFR 61.355(h). Monitoring will be performed on covers and all other openings. All openings shall be maintained in a closed, sealed position at all times that waste is in the container except when opening for waste loading, removal, inspection, or sampling.	Annual
Landfill Units/Cells Closed and Post-Closure (Alternate Cover System with Engineered Closure-Turf)	Differential settlement (to the extent of grade reversal or ponding water); exposed geotextile backing, exposed geomembrane, damage to engineered turf fibers in high traffic access areas, significant sand migration and drainage channel ballast materials (HydroBinder, rip rap, stone, etc.); physical damage from equipment and animals.	Semiannual
Oil Reclamation Facility Shredder	Poor condition of containers (e.g., severe rusting, apparent structural defects, leaking); Open containers; Improperly labeled containers; Inadequate aisle space.	Daily when in operation; otherwise, weekly

Table III.D- Inspection Schedule

Facility Unit(s) and Basic Elements	Possible Error, Malfunction, or Deterioration	Frequency of Inspection ¹
Oil Reclamation Facility Shredder	Detectable emissions from the closed-vent system components and connections exceed regulatory limits.	Annual
Oil Reclamation Facility Shredder	Defects in the closed vent system that could result in air pollutant emissions.	Quarterly
Oil Reclamation Facility Equipment Subject to 40 CFR Part 61 Subpart FF - National Emission Standard for Benzene Waste Operations: Process Vent Bypass/Oil Reclamation Facility Shredder	Check that vapors are being routed to the thermal oxidizer.	Daily when in operation
Oil Reclamation Facility Equipment Subject to 40 CFR Part 61 Subpart FF - National Emission Standard for Benzene Waste Operations: Closed-Vent System and Control Devices/Oil Reclamation Facility-Shredder	A visual inspection will be completed on the closed vent systems and control devices. The visual inspection shall include inspection of ductwork, piping, and connections to covers and control devices for evidence of visible defects such as holes in ductwork or piping and loose connections	Quarterly
Oil Reclamation Facility Equipment Subject to 40 CFR Part 61 Subpart FF - National Emission Standard for Benzene Waste Operations: Treatment processes/Oil Reclamation Facility Shredder	A visual inspection will be completed on treatment process seals, access doors, and all openings to ensure that no cracks or gaps are present. All openings shall be sealed and kept closed all the time waste is being treated except during inspection or maintenance.	Quarterly
Oil Reclamation Facility Equipment Subject to 40 CFR Part 61 Subpart FF - National Emission Standard for Benzene Waste Operations: Closed-Vent Systems/Oil Reclamation Facility Shredder	An annual leak check will be done on the closed-vent systems. Monitoring will be completed to demonstrate no detectable emissions as indicated by an instrument reading of less than 500 ppmv above background by methods specified in 40 CFR 61.355(h). The scope of monitoring shall include all piping connections, filters, valves, and blowers in the process vent and tank vent systems.	Annual
Oil Reclamation Facility Equipment Subject to 40 CFR Part 61 Subpart FF - National Emission Standard for Benzene Waste Operations: Treatment Process/Oil Reclamation Facility	An annual inspection is required for treatment process to ensure their operations are emission free. Monitoring will be completed to demonstrate no detectable emission as indicated by an instrument reading of less than 500 ppmv above background by	Annual

Table III.D- Inspection Schedule

Facility Unit(s) and Basic Elements	Possible Error, Malfunction, or Deterioration	Frequency of Inspection¹
Shredder	methods specified in 40 CFR 61.355(h). Monitoring will be performed on covers and all other openings. All openings shall be sealed and kept closed at all times the waste is being treated except during inspections or maintenance.	

¹Daily - Every working day.
Working Day - Day when hazardous waste is being actively managed
Weekly - A calendar week
Monthly - A calendar month
Quarterly - Based on the divisions of the calendar year

Table V.B Container Storage Areas

Permit Unit No.	Container Storage Area⁵	N.O.R No.	Rated Capacity	Dimensions	Containment Volume (including rainfall for enclosed areas)	Ignitable,¹ Reactive,¹ or Incompatible² Waste (Yes/No)
002	Drum Processing Building ⁵	24	972 55-gallon containers for a total of 53,460 gallons ⁴	Three (3) 25.6 ft x 55 ft Bays housed in 8,000 ft ² building	7,039 gallons	Yes. Compliance with 264.17, 264.176, and 264.177 addressed in the Container Management Report, Section V.B. of the Application
003	Controlled Parking/Storage Building I (East Side)	17	Twenty (20) roll-off boxes or trailers, 20 cubic yards each for a total of 400 cubic yards	Ten (10) 12.7 ft x 50 ft bays housed in a 6,500 ft ² (50 ft x 130 ft) building.	29,172 gallons (144 cubic Yards)	Yes. Compliance with 264.17, 264.176, and 264.177 addressed in the Container Management Report, Section V.B. of the Application.
004	Controlled Parking/Storage Building II (West Side)	70	55-gallon containers, roll-off boxes or trailers for a total of not more than 500 cubic yards or 101,000 gallons	Two (2) modules housed in a 17,500 ft ² (100 ft x 175 ft) building	28,125 gallons (98 cubic Yards)	Yes. Compliance with 264.17, 264.176, and 264.177 addressed in the Container Management Report, Section V.B. of the Application.
009	Uncovered Waste Storage Areas ³ .	62	Maximum combined capacity is 6,897 cubic yards ⁴	Nine (9) Areas totaling 246,725 ft ² 9-1: 260 ft x 105 ft; 9-2: 200 ft x 110 ft; 9-3: 60 ft x 100 ft; 9-4: 120 ft x 87.5 ft; 9-5: 200 ft x 350 ft; 9-6: 55 ft x 320 ft; 9-7: Thermal Pad:	Not Applicable	Yes. Compliance with 264.17, 264.175(c), 264.176, and 264.177 addressed in the Container Management Report, Section V.B. of the Application. Storage of liquids prohibited in 9-1 through 9-6 and 9-9 Areas.

Table V.B Container Storage Areas

Permit Unit No.	Container Storage Area ⁵	N.O.R No.	Rated Capacity	Dimensions	Containment Volume (including rainfall for enclosed areas)	Ignitable, ¹ Reactive, ¹ or Incompatible ² Waste (Yes/No)
				125 ft x 350 ft; 9-8: Future Distillation Unit (trapezoidal shape): 70 ft x 111.66 ft x 63.33 ft; 9-9: 191 ft x 225 ft		

- 1 Containers managing ignitable wastes must be located at least 15 meters (50 Feet) from the facility's property line. If managing ignitable wastes, provide in the engineering report drawings demonstrating compliance with the buffer zone requirement of 40 CFR 264.17 and 264.176.
- 2 Incompatible wastes 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. If managing incompatible wastes, provide in the engineering report a description of the procedures used to ensure compliance with 40 CFR 264.17 and 264.177.
- 3 Maximum combined capacity of TCEQ Permit Unit No. 009 shall not exceed 6897 cubic yards of waste at any time.
- 4 When catalyst processing and packaging activities are occurring within the Container Storage Area, the amount of RCRA/TSCA waste stored in the building will be limited 864 55-gallon drums, or the volume equivalent, as described in the Permit Renewal Application.
- 5 The following wastes are not managed in any of the permitted container storage areas: D003 (Reactive), FO20, FO21, FO22, F023, FO26, & FO27.

Table V.C. - Tanks and Tank Systems

Permit Unit No.	Tank	N.O.R. No.	Storage and/or Processing	Waste Nos. ¹	Rated Capacity ²	Dimensions (Approximate)	Containment Volume (including rainfall for unenclosed areas)	Unit will manage Ignitable, Reactive, or Incompatible waste (state all that apply)	Unit Status
005	Tank M-6	012	Processing /Storage	Waste Nos. 18, 19 and 21**	22,530 gallons	15'6" diameter x 16' 0" height	35,985 gallons	No ignitable, reactive, or incompatible wastes	Active
006	Tank S-1	042	Processing	Waste Nos. 18, 19 and 21**	20,235 gallons	15'6" diameter x 14.3." height	35,985 gallons	No ignitable, reactive, or incompatible wastes	Active
007	Tank S-2	043	Processing	Waste Nos. 18, 19 and 21**	20,235 gallons	15' 6" diameter x 14.4" height	35,985 gallons	No ignitable, reactive, or incompatible wastes	Active
008	Tank M-7	045	Processing	Waste Nos. 18,19 and 21**	8,800 gallons	10'0" diameter x 15'0" height	27,369 gallons	No ignitable, reactive, or incompatible wastes	Active
010	Tank M-3	041	Processing /Storage	Waste Nos. 18,19 and 21**	21,000 gallons	15'6" diameter x 16'0" height	27,369 gallons	No ignitable, reactive, or incompatible wastes	Active
011	Mixing Tank MT-1 (East)	065	Processing	Any waste listed in Table IV.B	26,798 gallons (132 cubic yards)	13' 1.5" x 18' 11.5" x 16' 11.5" height	40,796 gallons (202 cubic yards)	Yes ignitable, reactive, or incompatible wastes	Active

Table V.C. - Tanks and Tank Systems

Permit Unit No.	Tank	N.O.R. No.	Storage and/or Processing	Waste Nos. ¹	Rated Capacity ²	Dimensions (Approximate)	Containment Volume (including rainfall for unenclosed areas)	Unit will manage Ignitable, Reactive, or Incompatible waste (state all that apply)	Unit Status
012	Mixing Tank MT-2 (West)	068	Processing	Any waste listed in Table IV.B	26,798 gallons (132 cubic yards)	13' 1.5" x 18' 11.5" x 16' 11.5" height	40,796 gallons (202 cubic yards)	Yes ignitable, reactive, or incompatible wastes	Active
013	Mixing Tank MT-3	073	Processing	Any waste listed in Table IV.B	24,563 gallons (122 cubic yards)	16'0" x 22'0" x 10' 0" height	32,178 gallons (159 cubic yards)	Yes ignitable, reactive, or incompatible wastes	Active
014	Mixing Tank MT-4	074	Processing	Any waste listed in Table IV.B	24,563 gallons (122 cubic yards)	16' x 22' x 10'0"	32,178 gallons (159 cubic yards)	Yes ignitable, reactive, or incompatible wastes	Active
017	Bulk Stabilization Tanks	049	Inactive	Any waste listed in Table IV.B	7,358 gallons	15' 5" x 27'9" x 1' 9" each	31,797 gallons	Yes ignitable, reactive, or incompatible wastes	Active
020	Wastewater Tank WT-1	089	Processing /Storage	Note 3	20,000 gallons	15'diameter x 15'height	55,083 gallons (7,364 cubic feet)	Ignitable wastes	Active
021	Wastewater Tank WT-2	090	Processing /Storage	Note 3	20,000 gallons	15'0" diameter x 15'0" height	55,083 gallons (7,364 cubic feet)	Ignitable wastes	Active
022	Wastewater Tank WT-3	091	Processing /Storage	Note 3	20,000 gallons	15'0" diameter x 15'0" height	55,083 gallons (7,364 cubic feet)	Ignitable wastes	Active

Table V.C. - Tanks and Tank Systems

Permit Unit No.	Tank	N.O.R. No.	Storage and/or Processing	Waste Nos.¹	Rated Capacity²	Dimensions (Approximate)	Containment Volume (including rainfall for unenclosed areas)	Unit will manage Ignitable, Reactive, or Incompatible waste (state all that apply)	Unit Status
023	Wastewater Tank WT-4	092	Processing /Storage	Note 4	20,000 gallons	15' 0" diameter x 15' 0" height	55,083 gallons (7,364 cubic feet)	Ignitable wastes	Active
024	T-5	093	Processing	Note 3	15,000 gallons	30'7" Length x 7'7" Width x 8' 8" Height	232,214 gallons (31,044 cubic feet)	Ignitable wastes	Active
025	T-6	094	Processing	Note 3	17,700 gallons	36' Length x 7' 7" Width x 8' 8" height	232,214 gallons (31,044 cubic feet)	Ignitable wastes	Active
026	T-6A	095	Processing	Note 3	200 gallons	38'0" diameter x 41'0" length	232,214 gallons (31,044 cubic feet)	Ignitable wastes	Active
027	T-10	096	Processing /Storage	Note 3	11,000 gallons	10'0" diameter x 18' 3" height	15,649 gallons (2,092 cubic feet)	Ignitable wastes	Active
028	T-11	097	Processing /Storage	Note 3	11,000 gallons	10'0" diameter x 18' 3" height	15,649 gallons (2,092 cubic feet)	Ignitable wastes	Active
029	T-12	098	Processing /Storage	Note 3	11,000 gallons	10'0" diameter x 18' 3" height	15,649 gallons (2,092 cubic feet)	Ignitable wastes	Active
030	T-13	099	Processing /Storage	Note 3	11,000 gallons	10'0" diameter x 18' 3" height	15,649 gallons (2,092 cubic feet)	Ignitable wastes	Active
031	T-16	100	Processing /Storage	Note 3	39,500 gallons	15' 6" diameter x 28' 6" height	232,214 gallons (31,044 cubic feet)	Ignitable wastes	Active

Table V.C. - Tanks and Tank Systems

Permit Unit No.	Tank	N.O.R. No.	Storage and/or Processing	Waste Nos. ¹	Rated Capacity ²	Dimensions (Approximate)	Containment Volume (including rainfall for unenclosed areas)	Unit will manage Ignitable, Reactive, or Incompatible waste (state all that apply)	Unit Status
032	T-17	101	Processing /Storage	Note 3	39,500 gallons	15' 6" diameter x 28' 6" height	232,214 gallons (31,044 cubic feet)	Ignitable wastes	Active
033	T-30	102	Processing /Storage	Note 3	20,500 gallons	44' 9" Length x 8 feet 4" Width x 6 feet 6" Height	232,214 gallons (31,044 cubic feet)	Ignitable wastes	Active
034	T-31	103	Processing /Storage	Note 3	13,900 gallons	10' 0" diameter x 23' 2" height	232,214 gallons (31,044 cubic feet)	Ignitable wastes	Active
035	T-32	104	Processing /Storage	Note 3	13,900 gallons	10' 0" diameter x 23' 2" height	232,214 gallons (31,044 cubic feet)	Ignitable wastes	Active
036	T-33	105	Processing /Storage	Note 3	13,900 gallons	10' 0" diameter x 23' 2" height t	232,214 gallons (31,044 cubic feet)	Ignitable wastes	Active
037	T-34	106	Processing /Storage	Note 3	20,350 gallons	36'10" Length x 7' 11" Width x 8' Height (nom)	232,214 gallons (31,044 cubic feet)	Ignitable wastes	Active
038	T-35	107	Processing /Storage	Note 3	20,000 gallons	12'0" diameter x 23'6" height	232,214 gallons (31,044 cubic feet)	Ignitable wastes	Active
039	T-36	108	Processing /Storage	Note 3	20,000 gallons	12'0" diameter x 23' 6" height	232,214 gallons (31,044 cubic feet)	Ignitable wastes	Active
040	T-37	109	Processing /Storage	Note 3	20,000 gallons	12'0" diameter x 23' 6" height	232,214 gallons (31,044 cubic feet)	Ignitable wastes	Active

Table V.C. - Tanks and Tank Systems

Permit Unit No.	Tank	N.O.R. No.	Storage and/or Processing	Waste Nos. ¹	Rated Capacity ²	Dimensions (Approximate)	Containment Volume (including rainfall for unenclosed areas)	Unit will manage Ignitable, Reactive, or Incompatible waste (state all that apply)	Unit Status
041	T-3A	110	Processing	Note 3	20,000 gallons	12'0" diameter x 23'6" height	232,214 gallons (31,044 cubic feet)	No ignitable, reactive, or incompatible wastes	Active
042	T-40	111	Processing /Storage	Note 3	20,000 gallons	12'0" diameter x 23' 6" height	34,910 gallons (4,667 cubic feet)	Ignitable wastes	Active
043	T-41	112	Processing /Storage	Note 3	20,000 gallons	12'0" diameter x 23' 6" height	34,910 gallons (4,667 cubic feet)	Ignitable wastes	Active
044	T-42	113	Processing /Storage	Note 3	20,000 gallons	12'0" diameter x 23' 6" height	34,910 gallons (4,667 cubic feet)	Ignitable wastes	Active
045	T-43	114	Processing /Storage	Note 3	20,000 gallons	12'0" diameter x 23' 6" height	34,910 gallons (4,667 cubic feet)	Ignitable wastes	Active
047	DW-01	136	Processing /Storage	Waste Nos. 18, 19 and 21**	44,500 gallons	15' 6" diameter x 30' height	53,570 gallons (7,161 cubic feet)	No ignitable, reactive, or incompatible wastes	Proposed
048	DW-02	137	Processing /Storage	Waste Nos. 18, 19 and 21**	44,500 gallons	15' 6" diameter x 30' height	53,570 gallons (7,161 cubic feet)	No ignitable, reactive, or incompatible wastes	Proposed
049	DW-03	138	Processing /Storage	Waste Nos. 18, 19 and 21**	44,500 gallons	15' 6" diameter x 30' height	53,570 gallons (7,161 cubic feet)	No ignitable, reactive, or incompatible wastes	Proposed

Table V.C. - Tanks and Tank Systems

Permit Unit No.	Tank	N.O.R. No.	Storage and/or Processing	Waste Nos.¹	Rated Capacity²	Dimensions (Approximate)	Containment Volume (including rainfall for unenclosed areas)	Unit will manage Ignitable, Reactive, or Incompatible waste (state all that apply)	Unit Status
050	DW-04	139	Processing /Storage	Waste Nos. 18, 19 and 21**	44,500 gallons	15' 6" diameter x 30' height	53,570 gallons (7,161 cubic feet)	No ignitable, reactive, or incompatible wastes	Proposed
051	DW-05	140	Processing /Storage	Waste Nos. 18,19 and 21**	44,500 gallons	15' 6" diameter x 30' height	53,570 gallons (7,161 cubic feet)	No ignitable, reactive, or incompatible wastes	Proposed
052	DW-06	141	Processing /Storage	Waste Nos. 18, 19 and 21**	44,500 gallons	15' 6" diameter x 30' height	53,570 gallons (7,161 cubic feet)	No ignitable, reactive, or incompatible wastes	Proposed
053	DW-07	142	Processing /Storage	Waste Nos. 18,19 and 21**	27,480 gallons	12'0"diameter x 30'0" height	53,570 gallons (7,161 cubic feet)	No ignitable, Reactive, or incompatible wastes	Proposed
054	DW-08	143	Processing /Storage	Waste Nos. 18,19 and 21**	27,480 gallons	12'0"diameter x 30'0" height	53,570 gallons (7,161 cubic feet)	No ignitable, reactive, or incompatible wastes	Proposed
055	DW-09	144	Processing /Storage	Waste Nos. 18, 19 and 21**	27,480 gallons	12'0"diameterx 30'0" height	53,570 gallons (7,161 cubic feet)	No ignitable, reactive, or incompatible wastes	Proposed
056	DW-10	145	Processing /Storage	Waste Nos. 18, 19 and 21**	27,480 gallons	12'0"diameter x 30'0" height	53,570 gallons (7,161 cubic feet)	No ignitable, reactive, or incompatible wastes	Proposed

Table V.C. - Tanks and Tank Systems

Permit Unit No.	Tank	N.O.R. No.	Storage and/or Processing	Waste Nos.¹	Rated Capacity²	Dimensions (Approximate)	Containment Volume (including rainfall for unenclosed areas)	Unit will manage Ignitable, Reactive, or Incompatible waste (state all that apply)	Unit Status
057	DW-11	146	Processing /Storage	Waste Nos. 18,19 and 21**	44,500 gallons	15'6"diameter x 30'0"height	53,570 gallons (7,161 cubic feet)	No ignitable, reactive, or incompatible wastes	Proposed
058	DW-12	147	Processing /Storage	Waste Nos. 18,19 and 21**	44,500 gallons	15'6"diameter x 30'0"height	53,570 gallons (7,161 cubic feet)	No ignitable, reactive, or incompatible wastes	Proposed
059	DW-13	148	Processing /Storage	Waste Nos. 18,19 and 21**	44,500 gallons	15'6"diameter x 30'0"height	53,570 gallons (7,161 cubic feet)	No ignitable, reactive, or incompatible wastes	Proposed
060	DW-14	149	Processing /Storage	Waste Nos. 18,19 and 21**	44,500 gallons	15' 6" diameter x 30' height	53,570 gallons (7,161 cubic feet)	No ignitable, reactive, or incompatible wastes	Proposed
061	DW-15	150	Processing /Storage	Waste Nos. 18,19 and 21**	44,500 gallons	15' 6" diameter x 30' height	53,570 gallons (7,161 cubic feet)	No ignitable, reactive, or incompatible wastes	Proposed
062	DW-16	151	Processing /Storage	Waste Nos. 18,19 and 21**	44,500 gallons	15' 6" diameter x 30' height	53,570 gallons (7,161 cubic feet)	No ignitable, reactive, or incompatible wastes	Proposed
063	DW-17	152	Processing /Storage	Waste Nos. 18,19 and 21**	44,500 gallons	15' 6" diameter x 30' height	53,570 gallons (7,161 cubic feet)	No ignitable, reactive, or incompatible wastes	Proposed

Table V.C. - Tanks and Tank Systems

Permit Unit No.	Tank	N.O.R. No.	Storage and/or Processing	Waste Nos. ¹	Rated Capacity ²	Dimensions (Approximate)	Containment Volume (including rainfall for unenclosed areas)	Unit will manage Ignitable, Reactive, or Incompatible waste (state all that apply)	Unit Status
064	DW-18	153	Processing /Storage	Waste Nos. 18,19 and 21**	44,500 gallons	15' 6" diameter x 30' height	53,570 gallons (7,161 cubic feet)	No ignitable, reactive, or incompatible wastes	Proposed
065	DW-19	154	Processing /Storage	Waste Nos. 18,19 and 21**	22,000 gallons	15'6" diameter X 14' 0" height	37,359 gallons (4,994 cubic feet)	No ignitable, reactive, or incompatible wastes	Proposed
066	DW-20	155	Processing /Storage	Waste Nos. 18,19 and 21**	22,000 gallons	15'6" diameter X 14' 0" height	37,359 gallons (4,994 cubic feet)	No ignitable, reactive, or incompatible wastes	Proposed
067	DW-21	156	Processing /Storage	Waste Nos. 18,19 and 21**	22,000 gallons	15'6" diameter X 14' 0" height	37,359 gallons (4,994 cubic feet)	No ignitable, reactive or incompatible wastes	Proposed
068	DW-22	157	Processing /Storage	Waste Nos. 18,19 and 21**	22,000 gallons	15'6" diameter X 14' 0" height	37,359 gallons (4,994 cubic feet)	No ignitable, reactive or incompatible wastes	Proposed

Note 1: from Table IV.B, first column.

*If the unit is already permitted, use the established "Permit Unit No." If the unit is not yet permitted, the number given here for the unit will become the "Permit Unit No." The numbers should be in an order that will be convenient for the facility operator.

**Waste Nos. 18, 19, and 21 correspond to TCEQ Waste Form and Classification Codes 113H, 114H, and 116H, respectively.

Table V.C. - Tanks and Tank Systems

***Waste No. 92 corresponds to TCEQ Waste Form and Classification Code 503H.

Note 2: The design capacity is listed in the table as the "Rated Capacity" and the operating capacity may be less than the design capacity.

Note 3: Waste Nos. for liquids managed in tanks as per Table IV.B itemization for the Oil Reclamation Unit: 6, 7, 10, 14, 15, 18, 19, 20, 23, 25, 26, 28, 29, 30-34, 36, 38, 90, 92, 93, 94, 98, 99, 103, 109, 110-114, 117-122.

Note 4: Waste Nos. 6, 7, 10, 14, 15, 18, 19, 20, 21, 23, 25, 26, 32, 38, 90, 93, 94, 103.

TBD* - To Be Determined

Table V.K.1 - Miscellaneous Units

Permit Unit No.	Miscellaneous Unit	N.O.R. No.	Storage, Processing, and/or Disposal	Waste Nos. ¹	Rated Capacity	Dimensions	Unit will manage Ignitable, Reactive, or Incompatible Waste (state all that apply)
046	Thermal Desorption Unit (TDU) (Oil Reclamation Facility)	085	Processing	Note ²	60,000 ton/yr	350' x 125' pad	Ignitable
069	Shredder	158	Processing	Note ³	4000 Gallons	Note ⁴	Yes. Note ⁵

¹from Table IV.B, first column

²Oil Bearing Hazardous Waste (OBHW) from petroleum refining, production and transportation practices: F037, F038, K048, K049, K050, K051, K052, K169, K170, K171, K172, D001, D018; Characteristic byproducts and characteristic sludges: D001, D002, D004 thru D008, D009 (less than 260 mg/kg total Hg), D010, D011, and D018 thru D043. In limited mode of operation, TDU may process listed wastes to generate LDR compliant desorber solids for disposal with the recovered oil collected separately for disposal in an off-site RCRA permitted facility; in that mode of operation, all EPA waste numbers that meet TDU feed Operating Parameter Limit (OPL) restricted chemical criteria are acceptable, excluding prohibited wastes per Section 1.2.3 of the WAP that have been prohibited for “treatment” except that “Containerized bulk waste containing a volatile organic concentration (VOC) of twenty (20) percent by weight or greater” is acceptable for treatment in the Oil Reclamation Facility. TCEQ Waste Nos. 44, 47, 50, 56, 57, 59, 63, 72, 73, 77, 79, 80, 81, 90-94, 98-101, 103, 105, 106, 107-114, 117-122.

³ Various Nos. from Table IV.B (1-124)

⁴ Western portion of building (Area 1 - 29.5 ft x 39 ft; Area 2 - 15 ft x 20.88 ft) ~1,400 sq ft

⁵ Compliance with Ignitable, Reactive, or Incompatible Waste in accordance with 40 CFR 264.17 and as addressed in Miscellaneous Unit Report, Section V.B. of the Application.

Table VII.E.1. - Permitted Unit Closure Cost Summary

Existing Unit Closure Cost Estimate ^{2,3}	
Unit	Cost
Permit Unit No.001-Cell 43-46 (Included with Cell 50)	\$0.00
Permit Unit No. 001-Cell 48 (includes Cell 40/41/42)	\$0.00
Permit Unit No. 001-Cell 50	\$8,759,289.58
Permit Unit No. 002-Drum Processing Building	\$258,903.79
Permit Unit No. 003-Controlled Parking/Storage Building I (East Side)	\$165,693.35
Permit Unit No. 004-Controlled Parking/Storage Building II (West Side)	\$238,054.08
Permit Unit No. 005, 006, 007, 008, 0010-Deepwell Pretreatment System	\$224,686.43
Permit Unit No. 009-Uncovered Waste Storage Area ³	\$2,573,200.00
Permit Unit No. 011, Mixing Tank (MT-1) (East)	\$57,765.49
Permit Unit No. 012, Mixing Tank (MT-2) (West)	\$57,765.49
Permit Unit No. 013, Mixing Tank (MT-3)	\$53,472.90
Permit Unit No. 014, Mixing Tank (MT-4)	\$53,472.90
Permit Unit No. 020 Tank WT-1	\$9,772.51
Permit Unit No. 021 Tank WT-2	\$9,772.51
Permit Unit No. 022 Tank WT-3	\$9,772.51
Permit Unit No. 023 Tank WT-4	\$9,772.51
Permit Unit No. 024 Tank T-5	\$18,167.05
Permit Unit No. 025 Tank T-6	\$20,880.27
Permit Unit No. 026 Tank T-6A	\$2,740.31
Permit Unit No. 027 Tank T-10	\$13,828.31
Permit Unit No. 028 Tank T-11	\$13,828.31
Permit Unit No. 029 Tank T-12	\$13,828.31
Permit Unit No. 030 Tank T-13	\$13,828.31
Permit Unit No. 031 Tank T-16	\$43,800.19

Table VII.E.1. - Permitted Unit Closure Cost Summary

Permit Unit No. 032 Tank T-17	\$43,800.19
Permit Unit No. 033 Tank T-30	\$24,040.00
Permit Unit No. 034 Tank T-31	\$16,743.11
Permit Unit No. 035 Tank T-32	\$16,743.11
Permit Unit No. 036 Tank T-33	\$16,743.11
Permit Unit No. 037 Tank T-34	\$23,889.24
Permit Unit No. 038 Tank T-35	\$23,537.45
Permit Unit No. 039 Tank T-36	\$23,537.45
Permit Unit No. 041 Tank T-3A	\$23,537.45
Permit Unit No. 046 Thermal Desorption Unit (TDU)	\$332,723.74
Permit Unit No. 01h - Cell 051*	\$2,478,365.74
Phase I (051-1 and 051-2) *	\$1,656,934.22
Phase II (051-3 and 051-4) *	\$1,656,934.22
Permit Unit No. 040 Tank T-37	\$23,537.45
Permit Unit No. 042 Tank T-40	\$23,537.45
Permit Unit No. 043 Tank T-41	\$23,537.45
Permit Unit No. 044 Tank T-42	\$23,537.45
Permit Unit No. 045 Tank T-43	\$23,537.45
Total Existing Unit Closure Cost Estimate¹ Year³ (2021 Dollars)	\$19,077,511.39

Table VII.E.1. - Permitted Unit Closure Cost Summary

Proposed Unit Closure Cost Estimate ^{2,4}	
Unit	Cost
Permit Unit No. 001h, Cell 051*	\$0.00
Phase III (051-5and 051-6) *	\$1,656,934.22
Phase IV (051-7and 051-8) *	\$1,656,934.22
Permit Unit No. 001i - Cell 052**	\$2,495,566.03
Phase I (052-1 and 052-2) **	\$1,633,786.19
Phase II (052-3 and 052-4) **	\$1,633,786.19
Phase III (052-5and 052-6) **	\$1,633,786.19
Phase IV (052-7and 052-8) **	\$1,633,786.19
Phase V (052-9 and 052-10) **	\$1,633,786.19
Phase VI (052-11 and 052-12) **	\$1,633,786.19
Phase VII (052-13 and 052-14) **	\$1,633,786.19
Permit Unit No. 047, Tank DW-1	\$64,400.00
Permit Unit No. 048, Tank DW-2	\$64,400.00
Permit Unit No. 049, Tank DW-3	\$64,400.00
Permit Unit No. 050, Tank DW-4	\$64,400.00
Permit Unit No. 051, Tank DW-5	\$64,400.00
Permit Unit No. 052, Tank DW-6	\$64,400.00
Permit Unit No. 053, Tank DW-7	\$51,700.00
Permit Unit No. 054, Tank DW-8	\$51,700.00
Permit Unit No. 055, Tank DW-9	\$51,700.00
Permit Unit No. 56, Tank DW-10	\$51,700.00
Permit Unit No. 057, Tank DW-11	\$64,400.00
Permit Unit No. 058, Tank DW-12	\$64,400.00

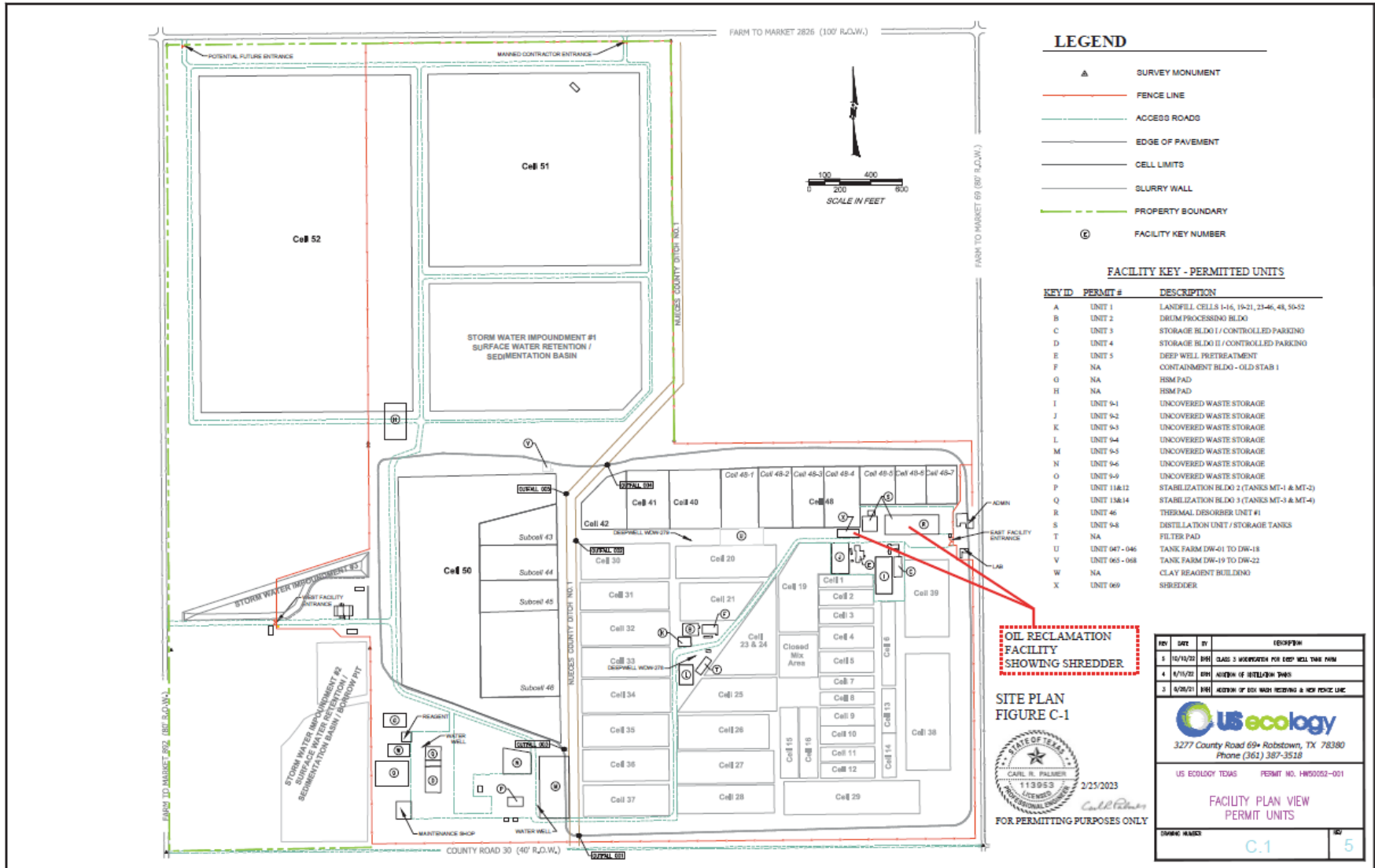
Table VII.E.1. - Permitted Unit Closure Cost Summary

Permit Unit No. 059, Tank DW-13	\$64,400.00
Permit Unit No. 060, Tank DW-14	\$64,400.00
Permit Unit No. 061, Tank DW-15	\$64,400.00
Permit Unit No.0 62, Tank DW-16	\$64,400.00
Permit Unit No. 063, Tank DW-17	\$64,400.00
Permit Unit No. 064, Tank DW-18	\$64,400.00
Permit Unit No. 065, Tank DW-19	\$37,700.00
Permit Unit No. 066, Tank DW-20	\$37,700.00
Permit Unit No. 067, Tank DW-21	\$37,700.00
Permit Unit No. 068, Tank DW-22	\$37,700.00
Permit Unit No. 069, Shredder	\$53,800.00
Total Proposed Unit Closure Cost Estimate	\$18,558,937.80

Notes:

1. As units are added or deleted from these tables through future permit amendments or modifications, the remaining itemized unit costs should be updated for inflation when re- calculating the revised total cost in current dollars.
 2. Closure costs will be reevaluated and/or adjusted for inflation in the Permit Renewal Application.
 3. Closure costs for Existing Units are in 2021 dollars (approved by TCEQ 9/16/2022), with the exception of Permit Unit 9, which was updated per this Class 3 permit modification application and represents 2022 costs.
 4. Proposed unit closure cost estimates for Cell 51 and Cell 52 are in 2021 dollars (approved by TCEQ 9/16/2022). Closure cost estimates for proposed Permit Unit Nos. 47-69 were developed for this Class 3 permit modification application and represent 2022 dollars.
- * For Cell 51, the permittee shall maintain a minimum of \$2,478,365.74 (2021 Dollars) for Unscheduled worst-case closure costs until all phases have received the closure acceptance and final closure of the Cell 51 has been approved by the TCEQ executive director.
 - ** For Cell 52, the permittee shall maintain minimum of \$2,495,566.03(2021 Dollars) for Unscheduled worst-case closure costs until all phases have received the closure acceptance and final closure of the Cell 52 has been approved by the TCEQ executive director.

Attachment B - Facility Map and Drawings



Attachment D.1. - Authorized Permitted Units

TCEQ Permit Unit No.¹	Unit Name	NOR No.¹	Unit Description³	Capacity	Unit Status²
01e	Cells 43/44/45/46	040	Landfill / Part of Cell 50	412,000 cubic yards	Active
01g	Cell #50	072	Landfill Cells (50-1,50-2,50-3,50-4, 50-5)	2,436,602 cubic yards	Active
002	Drum Processing Building	024	Storage and Processing	972 55-gallon containers for a total of 53,460 gallons	Active
003	Controlled Parking/Storage Building I (East Side)	017	Storage and Processing	Twenty (20) roll-off boxes or trailers, 20 cubic yards each for a total of 400 cubic yards.	Active
004	Controlled Parking/Storage Building II (West Side)	070	Storage and Processing	55-gallon containers, roll-off boxes or trailers for a total of not more than 500 cubic yards or 101,000 gallons.	Active
005	Tank M-6	012	Storage and Processing	22,530 gallons	Active
006	Tank S-1	042	Processing	20,235 gallons	Active
007	Tank S-2	043	Processing	20,235 gallons	Active
008	Tank M-7	045	Storage	8,800 gallons	Active
009	Uncovered Waste Storage Areas (Permit Units 9-1, 9-2, 9-3, 9-4, 9-5, 9-6, 9-7, 9-8, 9-9)	062	Storage in Nine Areas totaling 246,725 ft ²	Maximum combined capacity is 6,897 cubic yards.	Active
010	Tank M-3	041	Storage and Processing	21,000 gallons	Active
011	Mixing Tank MT-1 (East)	065	Processing	26,798 gallons (132 cubic yards)	Active
012	Mixing Tank MT-2 (West)	068	Processing	26,798 gallons (132 cubic yards)	Active
013	Mixing Tank MT-3	073	Processing	24,563 gallons (122 cubic yards)	Active
014	Mixing Tank MT-4	074	Processing	24,563 gallons (122 cubic yards)	Active
020	Wastewater Tank WT-1	089	Processing/ Storage	20,000 gallons	Active
021	Wastewater Tank WT-2	090	Processing/ Storage	20,000 gallons	Active
022	Wastewater Tank WT-3	091	Processing/ Storage	20,000 gallons	Active

Attachment D.1. - Authorized Permitted Units

TCEQ Permit Unit No.¹	Unit Name	NOR No.¹	Unit Description	Capacity	Unit Status²
023	Wastewater Tank WT-4	092	Processing/ Storage	20,000 gallons	Active
024	T-5	093	Processing	15,000 gallons	Active
025	T-6	094	Processing	17,700 gallons	Active
026	T-6A	095	Processing	200 gallons	Active
027	T-10	096	Processing/ Storage	11,000 gallons	Active
028	T-11	097	Processing/ Storage	11,000 gallons	Active
029	T-12	098	Processing/ Storage	11,000 gallons	Active
030	T-13	099	Processing/ Storage	11,000 gallons	Active
031	T-16	100	Processing/ Storage	39,500 gallons	Active
032	T-17	101	Processing/ Storage	39,500 gallons	Active
033	T-30	102	Processing/ Storage	20,500 gallons	Active
034	T-31	103	Processing/ Storage	13,900 gallons	Active
035	T-32	104	Processing/ Storage	13,900 gallons	Active
036	T-33	105	Processing/ Storage	13,900 gallons	Active
037	T-34	106	Processing/ Storage	20,350 gallons	Active
038	T-35	107	Processing/ Storage	20,000 gallons	Active
039	T-36	108	Processing/ Storage	20,000 gallons	Active
040	T-37	109	Processing/ Storage	20,000 gallons	Active
041	T-3A	110	Processing	20,000 gallons	Active
042	T-40	111	Processing/ Storage	20,000 gallons	Active
043	T-41	112	Processing/ Storage	20,000 gallons	Active
044	T-42	113	Processing/ Storage	20,000 gallons	Active
045	T-43	114	Processing/ Storage	20,000 gallons	Active
046	Thermal Desorber Unit	085	Processing	60,000 Tons	Active
01h	Cell 51	128	Landfill Cell	3,463,000 cubic yards	Active
01i	Cell 52	129	Landfill Cell	7,355,000 cubic yards	Proposed

Attachment D.1. - Authorized Permitted Units

TCEQ Permit Unit No.¹	Unit Name	NOR No.¹	Unit Description	Capacity	Unit Status²
047	Deepwell Tank -DW-01	136	Processing/ Storage	44,500 gallons	Proposed
048	Deepwell Tank - DW-02	137	Processing/ Storage	44,500 gallons	Proposed
049	Deepwell Tank - DW-03	138	Processing/ Storage	44,500 gallons	Proposed
050	Deepwell Tank - DW-04	139	Processing/ Storage	44,500 gallons	Proposed
051	Deepwell Tank - DW-05	140	Processing/ Storage	44,500 gallons	Proposed
052	Deepwell Tank - DW-06	141	Processing/ Storage	44,500 gallons	Proposed
053	Deepwell Tank - DW-07	142	Processing/ Storage	27,480 gallons	Proposed
054	Deepwell Tank - DW-08	143	Processing/ Storage	27,480 gallons	Proposed
055	Deepwell Tank - DW-09	144	Processing/ Storage	27,480 gallons	Proposed
056	Deepwell Tank - DW-10	145	Processing/ Storage	27,480 gallons	Proposed
057	Deepwell Tank - DW-11	146	Processing/ Storage	44,500 gallons	Proposed
058	Deepwell Tank - DW-12	147	Processing/ Storage	44,500 gallons	Proposed
059	Deepwell Tank - DW-13	148	Processing/ Storage	44,500 gallons	Proposed
060	Deepwell Tank - DW-14	149	Processing/ Storage	44,500 gallons	Proposed
061	Deepwell Tank - DW-15	150	Processing/ Storage	44,500 gallons	Proposed
062	Deepwell Tank - DW-16	151	Processing/ Storage	44,500 gallons	Proposed
063	Deepwell Tank - DW-17	152	Processing/ Storage	44,500 gallons	Proposed
064	Deepwell Tank - DW-18	153	Processing/ Storage	44,500 gallons	Proposed
065	Deepwell Tank - DW-19	154	Processing/ Storage	22,000 gallons	Proposed
066	Deepwell Tank - DW-20	155	Processing/ Storage	22,000 gallons	Proposed
067	Deepwell Tank - DW-21	156	Processing/ Storage	22,000 gallons	Proposed
068	Deepwell Tank - DW-22	157	Processing/ Storage	22,000 gallons	Proposed
069	Shredder	158	Shredder	4,000 gallons	Proposed

¹Permitted Unit No. and NOR No. cannot be reassigned to new units or used more than once and all units that were in the Attachment D of a previously issued permit must be listed.

²Unit Status options: Active, Closed, Inactive (built but not managing waste), Proposed (not yet built), Never Built, Transferred, Post-Closure Care, Closed.

Attachment D.2. - Closed Permitted Units

TCEQ Permit Unit No.¹	Unit Name	NOR No.¹	Unit Description	Capacity	Unit Status²
01a	Landfill Cell 38	001	Landfill Cell	76,332 cubic yards	Post-Closure Care
01b	Landfill Cell 39	037	Landfill Cell	96,077 cubic yards	Post-Closure Care
01c	Landfill Cell 40	038	321 feet x 419 feet	80,800 cubic yards	Closed
01d	Landfill Cell 41-42	039	Cell 41: 413 ft x 238 ft Cell 42: (Polygon-shape Dimensions) 413 ft x 287 ft 210 ft x 231 ft x 130 ft	(Cell 41) 83,500 cubic yards (Cell 42) 76,000 cubic yards	Closed
01f	Landfill Cell 48 (Vertical Expansion of Cells 40/41/42)	054	1466 ft x 410 ft	847,000 cubic yards	Post-Closure Care
011	Landfill Cell 26	052	Landfill Cell	93,000 cubic yards	Post-Closure Care
-	Containment Building	025	Bulk material processing/containment building	-	Closed
015	Tank SL-1	026	Processing/Storage	8,000 gallons	Never built
016	Bulk Stabilization Tank	047	Mixing Tank in Bulk material processing/containment building	7,358 gallons	Closed
017	Bulk Stabilization Tank	049	Mixing Tank in Bulk material processing/containment building	7,358 gallons	Closed
018	Oil/Water Separator	044	Processing	1,525 gallons	Closed
019	Clarifier	046	Processing	4,200 gallons	Closed

¹Permitted Unit No. and NOR No. cannot be reassigned to new units or used more than once and all units that were in the Attachment D of a previously issued permit must be listed.

²Unit Status options: Active, Closed, Inactive (built but not managing waste), Proposed (not yet built), Never Built, Transferred, Closed, Post-Closure Care.

Attachment B:

Technical Summary and Executive Director's Preliminary Decision Permit No. 50052

Technical Summary and Executive Director's Preliminary Decision

May 29, 2023

Description of Application

US Ecology Texas, Inc.
Industrial Solid Waste Registration No. 50052
Hazardous Waste Permit No. 50052
EPA I.D. No. TXD069452340

Location: US Ecology Texas, Inc. (USET) is located at 3277 County Road 69, Robstown, Texas 78380, south of the intersection of Farm to Market Road 2826 and County Road 69 on approximately 473 acres in Robstown, Nueces County, Texas. The site is within the drainage area of Segment 2204 of the Petronila Creek Tidal, Nueces-Rio Grande Coastal Basin (North Latitude 27° 43' 43", West Longitude 97° 39' 28").

This facility is located in an area subject to the Texas Coastal Management Program (CMP). This hazardous waste permit modification application complies with the applicable requirements of 30 Texas Administrative Code (TAC) Chapters 335 and 305 which are consistent with and satisfy the requirements of the CMP. As a result, the Texas Commission on Environmental Quality (TCEQ) reviewed this action for consistency with the goals and policies of the CMP in accordance with the regulations of the Coastal Coordination Council (CCC) and determined that the permit meets all the applicable CMP goals and policies.

General: USET is a commercial hazardous and industrial solid waste management facility which stores, processes, and disposes of hazardous and non-hazardous wastes. Waste management units currently authorized by the permit include landfills, container storage areas, stabilization buildings with mixing tanks, a tank farm incorporating a pretreatment system and deep well injection surface facilities, physical and chemical processing operations, and an oil reclamation facility consisting of thermal desorber unit and associated tanks. Disposal functions are limited to landfilling of wastes authorized under this permit. Wastes are received from off-site sources and are also generated on-site on a commercial basis. The wastes managed by the facility include hazardous and nonhazardous Class 1, Class 2, and Class 3 industrial solid wastes.

The original permit was issued on December 5, 1988, for a term of ten years. The permit was renewed on December 9, 1999, for an additional ten-year term. Subsequently, the TCEQ issued the current permit on March 25, 2013.

Request: USET applied to the TCEQ for a Class 3 modification to authorize an increase in permitted container storage capacity for outdoor container storage area (Permit Unit No. 9), add additional waste codes for management in tank systems Tanks WT-1, WT-2, WT-3 and WT-4, add twenty-two (22) new tanks for storage and processing, and add a new shredder unit as a miscellaneous unit. The minor amendment requests to reformat application and table information to comply with the new TCEQ format requirements. This permit modification meets the requirements of 30 TAC Section 305.69(k), 30 TAC 305.69(k)(F)(1)(a), 30 TAC 305.69(k)(G)(1)(a), and 30 TAC 305.69(k)(G)(5)(a), for a Class 3 permit modification because the requested changes will authorize addition of storage capacity for outdoor container storage area, addition of new tanks, and a new

miscellaneous unit, and waste codes that require different management practice. TCEQ received the application, dated November 21, 2022 on November 28, 2022.

Authority: TCEQ prepared a draft permit modification in accordance with applicable requirements of 30 TAC Chapters 335 and 305, and 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.). The TCEQ and the U.S. Environmental Protection Agency (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 Information

TCEQ prepared a draft Class 3 permit modification to modify Permit No. 50052. The draft permit modification contains the revisions described below:

- A. Revise Inspection Schedule to include inspection requirements for miscellaneous unit (shredder) and reformat the Table III-D Inspection Schedule.
- B. Revise Engineering report for outdoor container storage area (Permit Unit No. 9) and associated Table V.B.-Container Storage Areas to increase the storage capacity from 5,285 cubic yards to 6,897 cubic yards.
- C. Revise Engineering Reports for tanks and associated Table V.C.- Tanks to add new tanks and to add additional waste codes for acceptance in tank systems Tanks WT-1, WT-2, WT-3 and WT-4.
- D. Revise Engineering Report for miscellaneous unit and associated Table V.K.1.- Miscellaneous Units for addition of a new shredder unit.
- E. Revise Closure and Post-Closure plans to address addition of proposed waste management units.
- F. Revise Table VII.E.1.- Closure Cost Estimates to address updated cost estimates.
- G. The addition of the tanks and miscellaneous unit with the following description and corresponding regulatory requirements:

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 unit - Design and operating requirements for the shredder unit; maintenance and inspection requirements; closure requirements. (40 CFR Part 264, Subpart X)

Public Notice

The permittee provided public notice of the requested modification in accordance with 30 TAC Sections 305.69(d) and 39.509.

The public notice issued in conjunction with the final draft permit 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. The TCEQ and EPA have entered into a joint permitting agreement whereby RCRA permits will be issued in Texas in accordance with the Texas Solid Waste Disposal Act, Texas Health and Safety Code Ann., Chapter 361, and with RCRA, as amended. If TCEQ and EPA decide to issue a final permit to this facility, the permit will implement both the requirements of RCRA as amended by the Hazardous and Solid Waste Amendments of 1984 (HSWA) and the federally authorized State requirements. However, the State of Texas has not received full HSWA authority. Therefore, if the draft permit contains HSWA requirements for which the TCEQ is not authorized, both the TCEQ and EPA must issue the permit in order for the applicant to have a fully effective RCRA permit. Any jointly issued permit provisions will be fully enforceable under State and Federal law. Areas in which the TCEQ is not 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 EPA in writing as follows: Chief, RCRA Permits & Solid Waste Section, EPA Region 6 - LCRRP, 1201 Elm Street, Suite 500, Dallas, Texas 75270-2102. EPA will accept hearing requests submitted to the TCEQ.

Opportunity for Public Hearing

Before a permit Class 3 modification can be issued, 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 Class 3 modification 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 Class 3 modification 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 made a preliminary decision that this proposed permit modification, if issued, meets all the statutory and regulatory requirements.

Special: The proposed permit modification does not authorize variances or alternatives to required standards.

Additional Information

A. Technical information:

Srinath Venkat, 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
512/239-2335

B. 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:

Srinath Venkat
Project Manager
Industrial & Hazardous Waste Permits Section
Waste Permits Division

Attachment C

Compliance History Report 2023_07_10 Permit No. 50052



Compliance History Report

Compliance History Report for CN603247974, RN101445666, Rating Year 2022 which includes Compliance History (CH) components from September 1, 2017, through August 31, 2022.

Customer, Respondent, or Owner/Operator: CN603247974, US Ecology Texas, Inc. **Classification:** SATISFACTORY **Rating:** 20.17

Regulated Entity: RN101445666, US ECOLOGY TEXAS **Classification:** SATISFACTORY **Rating:** 20.17

Complexity Points: 34 **Repeat Violator:** NO

CH Group: 11 - Waste Management (Excluding Landfills)

Location: 3277 CR 69 ROBSTOWN, TX 78380, NUECES COUNTY

TCEQ Region: REGION 14 - CORPUS CHRISTI

ID Number(s):

AIR OPERATING PERMITS ACCOUNT NUMBER NE0126S
AIR OPERATING PERMITS PERMIT 2300
AIR NEW SOURCE PERMITS REGISTRATION 170988
AIR NEW SOURCE PERMITS REGISTRATION 144361
AIR NEW SOURCE PERMITS REGISTRATION 163034
AIR NEW SOURCE PERMITS PERMIT 161782
AIR NEW SOURCE PERMITS REGISTRATION 161357
PETROLEUM STORAGE TANK REGISTRATION
 REGISTRATION 59303
UNDERGROUND INJECTION CONTROL PERMIT WDW278
UNDERGROUND INJECTION CONTROL PERMIT
 5X2600077
STORMWATER EPA ID TX0104400
AIR EMISSIONS INVENTORY ACCOUNT NUMBER NE0126S
INDUSTRIAL AND HAZARDOUS WASTE SOLID WASTE
 REGISTRATION # (SWR) 50052
INDUSTRIAL AND HAZARDOUS WASTE EPA ID
 TXD069452340

AIR OPERATING PERMITS ACCOUNT NUMBER NEA007G
AIR NEW SOURCE PERMITS ACCOUNT NUMBER NE0126S
AIR NEW SOURCE PERMITS AFS NUM 4835501684
AIR NEW SOURCE PERMITS PERMIT 90163
AIR NEW SOURCE PERMITS REGISTRATION 170110
AIR NEW SOURCE PERMITS REGISTRATION 148495
MUNICIPAL SOLID WASTE DISPOSAL PERMIT 50052
IHW CORRECTIVE ACTION SOLID WASTE REGISTRATION
 # (SWR) 50052
UNDERGROUND INJECTION CONTROL PERMIT WDW279
STORMWATER PERMIT WQ0002888000
STORMWATER PERMIT TXR15874N
POLLUTION PREVENTION PLANNING ID NUMBER
 P00685
INDUSTRIAL AND HAZARDOUS WASTE PERMIT 50052

Compliance History Period: September 01, 2017 to August 31, 2022 **Rating Year:** 2022 **Rating Date:** 09/01/2022

Date Compliance History Report Prepared: July 10, 2023

Agency Decision Requiring Compliance History: Permit - Issuance, renewal, amendment, modification, denial, suspension, or revocation of a permit.

Component Period Selected: July 10, 2018 to July 10, 2023

TCEQ Staff Member to Contact for Additional Information Regarding This Compliance History.

Name: Srinath Venkat, P.E.

Phone: (512) 239-6382

Site and Owner/Operator History:

- 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/operator of the site during the compliance period? NO

Components (Multimedia) for the Site Are Listed in Sections A - J

A. Final Orders, court judgments, and consent decrees:

- 1 Effective Date: 05/23/2019 ADMINORDER 2018-0249-MLM-E (1660 Order-Agreed Order With Denial)
 Classification: Minor
 Citation: 30 TAC Chapter 335, SubChapter A 335.6(c)
 Description: Failed to update the Site's NOR.
 Classification: Moderate
 Citation: 30 TAC Chapter 335, SubChapter C 335.69(a)(1)(B)

40 CFR Chapter 262, SubChapter I, PT 262, SubPT C 262.34(a)(1)(ii)

40 CFR Chapter 265, SubChapter I, PT 265, SubPT J 265.192(a)

Description: Failed to maintain a written assessment reviewed and certified by a registered professional engineer attesting that the system has sufficient structural integrity and is acceptable for storing and treating HW.

Classification: Moderate

Citation: 2D TWC Chapter 26, SubChapter A 26.121(a)

30 TAC Chapter 305, SubChapter F 305.125(1)

Rqmt Prov: PP. I. Effluent Limitations. PERMIT

Description: Failure to comply with the permit effluent limitations for pH.

Classification: Major

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

40 CFR Chapter 264, SubChapter I, PT 264, SubPT C 264.13(b)

Rqmt Prov: PP. II. A. Duty to Comply PERMIT

PP. IV. A. Waste Analysis Plan PERMIT

WAP Secs. 4.0 and 4.1 (by reference) PERMIT

Description: Failed to comply with the Site's written waste analysis plan ("WAP").

Classification: Major

Citation: 30 TAC Chapter 331, SubChapter D 331.67

Rqmt Prov: PP. IX. Record Keeping Requirements PERMIT

Description: Failed to maintain complete and accurate WDW records for the life of the well, and three years after closure, and make them available upon request by TCEQ personnel.

Classification: Moderate

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

40 CFR Chapter 264, SubChapter I, PT 264, SubPT I 264.175(b)(1)

40 CFR Chapter 264, SubChapter I, PT 264, SubPT J 264.193(e)(1)(iii)

Rqmt Prov: PP. II. A. Duty to Comply PERMIT

PP. III. A. Operation of Facility PERMIT

V.B.3 PERMIT

Description: Failed to maintain the HW tank secondary containment external liner system free of cracks or gaps.

Classification: Moderate

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

40 CFR Chapter 264, SubChapter I, PT 264, SubPT I 264.171

Rqmt Prov: PP. II. A. Duty to Comply PERMIT

PP. V. B. 4. a. Container Storage Areas PERMIT

Description: Failed to prevent the storage of wastes containing free liquids in a permitted container storage area ("CSA") prohibited from storing wastes with free liquids.

Classification: Moderate

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

40 CFR Chapter 264, SubChapter I, PT 264, SubPT I 264.175(b)(1)

Rqmt Prov: PP. II. A. Duty to Comply PERMIT

PP. III. A. Operation of Facility PERMIT

Description: Failure to maintain a secondary containment system for a container storage area which is free of gaps and that is sufficiently impervious to contain leaks, spills, and accumulated precipitation until the material is detected and removed.

Classification: Moderate

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

30 TAC Chapter 335, SubChapter C 335.69(d)(1)

40 CFR Chapter 264, SubChapter I, PT 264, SubPT I 264.171

40 CFR Chapter 265, SubChapter I, PT 265, SubPT I 265.171

Rqmt Prov: PP. II. A. Duty to Comply PERMIT

PP. III. A. Operation of Facility PERMIT

Description: Failed to maintain containers used to store HW in good condition.

Classification: Moderate

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

40 CFR Chapter 264, SubChapter I, PT 264, SubPT C 264.15(a)

40 CFR Chapter 264, SubChapter I, PT 264, SubPT C 264.15(c)

40 CFR Chapter 264, SubChapter I, PT 264, SubPT J 264.196

Rqmt Prov: PP. II. A. Duty to Comply PERMIT

PP. III. A. Operation of Facility PERMIT

Description: Failed to remedy any deterioration or malfunction discovered by an inspection and failure to remove as much

of the waste as is necessary to prevent further release of hazardous waste to the environment.

Classification: Minor

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

Rqmt Prov: PP. II. A. Duty to Comply PERMIT

PP. III. A. Operation of Facility PERMIT

PP. V. A. 1. Authorized Units PERMIT

Description: Failed to prevent the flow of stormwater onto a permitted unit.

Classification: Minor

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

Rqmt Prov: PP. II. A. Duty to Comply PERMIT

PP. V. A. 1. Authorized Units PERMIT

Description: Failure to clearly identify all authorized units with signage indicating "TCEQ PERMIT UNIT No._".

Classification: Moderate

Citation: 30 TAC Chapter 331, SubChapter D 331.63(g)

30 TAC Chapter 331, SubChapter D 331.64(c)

30 TAC Chapter 331, SubChapter D 331.64(d)

Rqmt Prov: PP. VIII. A. Monitoring and Testing PERMIT

Description: Failure to test and calibrate quarterly all gauges, pressure sensing, and recording devices and failure to maintain gauges and recording devices in proper working order at all times.

Classification: Moderate

Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)

5C THSC Chapter 382 382.085(b)

Rqmt Prov: PP. Special Conditions SC1. PERMIT

Description: Failed to prevent unauthorized emissions. Specifically, Respondent released 53.34 pounds (lbs.) of particulate matter, 20.00 lbs. of nitrogen oxides, 283.38 lbs. of carbon monoxide, and 467.40 lbs. of volatile organic compounds from Stabilization Building No. 2 ("STAB2"), during an emissions event (Incident No. 202924) that began on August 28, 2014 and lasted 45 minutes. This event was caused by a fire that occurred due to contamination of the treatment pans in STAB2.

Classification: Moderate

Citation: 30 TAC Chapter 335, SubChapter A 335.6(c)

Description: Failed to update the Site's NOR. Specifically, Respondent failed to update the description of waste management unit ("WMU") 083, update the type of WMU for 056, and notify of a WMU observed outside the Catalyst Building.

Classification: Minor

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

40 CFR Chapter 262, SubChapter I, PT 262, SubPT B 262.20(a)(1)

Description: Failed to comply with Class 1 waste manifest requirements. Specifically, on Manifest No. 014094217JJK from February 24, 2015, Respondent failed to include TWC0026001H on line 8; on Manifest No. 0147759043JJK from June 11, 2015, Respondent failed to include TWC1500203H and incorrectly listed F001 on line 10; and on Manifest No. 012926452JJK from September 26, 2015, Respondent failed to include D002, D004, D005, D006, D007, and D008 on line 15.

Classification: Moderate

Citation: 30 TAC Chapter 305, SubChapter F 305.125

40 CFR Chapter 264, SubChapter I, PT 264, SubPT C 264.15

Rqmt Prov: PP.II.A.2 Duty to Comply PERMIT

PP.III.D General Inspection Requirements PERMIT

Description: Failed to follow the inspection schedule contained in the permit application submittals identified in Provision III.D and as set out in Table III.D- Inspection Schedule. Failed to maintain records of inspections as required by 40 CFR 264.15(d).

Classification: Major

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

40 CFR Chapter 264, SubChapter I, PT 264, SubPT C 264.13(b)

Rqmt Prov: PP.II.A.2 Duty to Comply PERMIT

PP.IV.A Waste Analysis Plan PERMIT

WAP Secs. 4.0 and 4.1 (by reference) PERMIT

Description: Failed to comply with the Site's written WAP. Specifically, HW meeting EPA code K170 was accepted at the Site on January 8, 2015, with an LDR form indicating the HW must meet certain treatment standards prior to land disposal. The LDR form was later changed indicating that the HW did meet treatment standards. The HW was directly land disposed prior to discrepancies with the LDR form being resolved.

Classification: Major

Citation: 30 TAC Chapter 331, SubChapter D 331.63(h)

Rqmt Prov: PP.V.C Character of Waste Streams V.C PERMIT

PP.V.D PERMIT

Description: Failed to maintain chemical and physical characteristics of the injected fluids within specified permit limits.

Specifically, the pH of injected waste streams shall be greater than 5.0, but on June 17, 2014, and November 13, 2014, the pH of the injected waste stream was recorded as 4.95 and 4.92, respectively. Additionally, the specific gravity of the injected waste streams shall not be greater than 1.046 or less than 0.998, but was 0.975 on September 2, 2014, 0.997 on March 8 and 12, 2015,

Classification: Moderate

Citation: 30 TAC Chapter 331, SubChapter D 331.63(f)

Rqmt Prov: PP.VII.C Operating Parameters VII.C PERMIT

Description: Failed to ensure the maximum injection rate shall not exceed 100 GPM.

Classification: Minor

Citation: 30 TAC Chapter 331, SubChapter D 331.64(c)

Rqmt Prov: PP.XI.E.2 Additional Requirements XI.E PERMIT

Description: Failed to maintain pressure gauges at the wellhead in proper operating condition at all times. Specifically, on September 25, 2015, an injection pressure of 630 PSI was recorded at WDW278 injection pressure gauge; however, an injection pressure of 754 PSI was recorded on the deepwell computer in the control room. The difference of 124 PSI between the field gauge and monitoring equipment is greater than the 4% or 40 PSI allowed.

Classification: Major

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

30 TAC Chapter 335, SubChapter F 335.173(k)

Rqmt Prov: PP.II.A.2 Duty to Comply PERMIT

PP.V.G.4(c) General Landfilling Ops. PERMIT

Description: Failed to maintain six inches of cover soil or alternative cover on exposed HW prior to the end of each working day.

Classification: Major

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

40 CFR Chapter 264, SubChapter I, PT 264, SubPT C 264.31

40 CFR Chapter 264, SubChapter I, PT 264, SubPT J 264.198(a)(2)

Rqmt Prov: PP.II.A.2 Duty to Comply PERMIT

PP.III.A Operation of Facility PERMIT

Description: Failed to operate the Site to minimize the possibility of a fire, explosion, or any release of HW or HW constituents which could threaten human health or the environment.

Classification: Minor

Citation: 30 TAC Chapter 331, SubChapter D 331.67

Rqmt Prov: PP.IX Record Keeping Requirements PERMIT

Description: Failed to maintain complete and accurate records.

Classification: Major

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

40 CFR Chapter 268, SubChapter I, PT 268, SubPT D 268.45(a)(2)

Rqmt Prov: PP.II.A.2 Duty to Comply PERMIT

PP.II.A.7 Land Disposal Restrictions PERMIT

Description: Failed to comply with LDR treatment standards for HW debris.

Classification: Moderate

Citation: 30 TAC Chapter 331, SubChapter D 331.63(f)

40 CFR Chapter 146, SubChapter D, PT 146, SubPT G 146.67(a)

Rqmt Prov: PP VII(C) Operating Parameters PERMIT

Description: Failed to ensure the maximum injection rate did not exceed 100 gallons per minute (gpm).

Classification: Moderate

Citation: 30 TAC Chapter 331, SubChapter D 331.63(e)

40 CFR Chapter 146, SubChapter D, PT 146, SubPT G 146.67(c)

Rqmt Prov: PP VII(E) Operating Parameters PERMIT

Description: Failed to maintain the annulus pressure at least 100 PSI greater than the injection tubing pressure to prevent leaks from the well into unauthorized zones and to detect well malfunctions.

Classification: Moderate

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

40 CFR Chapter 264, SubChapter I, PT 264, SubPT B 264.13

40 CFR Chapter 268, SubChapter I, PT 268, SubPT D 268.40

Rqmt Prov: II.A. PERMIT

II.A.7. Land Disposal Restrictions PERMIT

IV.A. PERMIT

Description: Failed to prevent the treatment, storage, and disposal of unauthorized HW, in violation of 30 TEX. ADMIN. CODE § 305.125(1), 40 C.F.R. §§ 264.13 and 268.40, and HW Permit No. 50052, Permit Provisions Nos. II.A., II.A.7., and IV.A. Specifically, Respondent disposed of 62 drums (28,349 pounds) of HW meeting EPA code U122 at the Site on April 15, 2013;

Classification: Moderate

Citation: 30 TAC Chapter 305, SubChapter F 305.125(1)
40 CFR Chapter 264, SubChapter I, PT 264, SubPT B 264.15(b)(1)

Description: Failed to comply with the Site's written inspection schedule, in violation of 30 TEX. ADMIN. CODE § 305.125(1), 40 C.F.R. § 264.15(b)(1), and HW Permit No. 50052, Permit Provisions Nos. II.A. and III.D. Specifically, Respondent failed to conduct quarterly monitoring well inspections;

Classification: Moderate

Citation: 30 TAC Chapter 305, SubChapter F 305.125(1)
40 CFR Chapter 264, SubChapter I, PT 264, SubPT C 264.15(d)

Description: Failed to properly record inspections in an inspection log or summary, in violation of 30 TEX. ADMIN. CODE § 305.125(1), 40 C.F.R. § 264.15(d), and HW Permit No. 50052, Permit Provisions Nos. II.A. and III.D. Specifically, Respondent failed to document the time of the inspection on monthly safety equipment inspection logs and monitoring well inspection logs;

2 Effective Date: 09/16/2020 ADMINORDER 2020-0169-AIR-E (1660 Order-Agreed Order With Denial)

Classification: Moderate

Citation: 30 TAC Chapter 116, SubChapter B 116.115(b)(2)(F)
30 TAC Chapter 116, SubChapter B 116.115(c)
5C THSC Chapter 382 382.085(b)

Rqmt Prov: General Condition No. 14 PERMIT
General Condition No. 8 PERMIT
Special Condition No. 1 PERMIT

Description: Failed to comply with the maximum allowable emissions rates ("MAERs"). Specifically, during a stack test conducted on May 10, 2016, the Respondent exceeded the PM10 MAER of 0.03 pound per hour ("lb/hr") by 1.06 lbs/hr and exceeded the PM2.5 MAER of 0.01 lb/hr by 1.08 lbs/hr for the Stabilization Building 2 Pans Baghouse, EPN BH1, resulting in a total of 6,039.36 lbs of unauthorized particulate matter emissions.

Classification: Moderate

Citation: 30 TAC Chapter 116, SubChapter B 116.115(b)(2)(F)
30 TAC Chapter 116, SubChapter B 116.115(c)
5C THSC Chapter 382 382.085(b)

Rqmt Prov: General Condition No. 14 PERMIT
General Condition No. 8 PERMIT
Special Condition No. 1 PERMIT

Description: Failed to comply with the MAERs. Specifically, during a stack test conducted on July 20, 2016, the Respondent exceeded the PM10 MAER of 0.01 lb/hr by 0.78 lb/hr and exceeded the PM2.5 MAER of 0.01 lb/hr by 0.78 lb/hr for the Catalyst Building Baghouse Scrubber, EPN BH4, resulting in a total of 3,032.64 lbs of unauthorized particulate matter emissions.

Classification: Moderate

Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
5C THSC Chapter 382 382.085(b)

Rqmt Prov: General Condition No. 14 PERMIT
Special Condition No. 4(A) PERMIT

Description: Failed to store the cement kiln dust stockpile inside the kiln dust storage building to minimize potential fugitive emissions. Specifically, on September 26, 2018, TCEQ staff observed that the cement kiln dust stockpile was extending beyond the walls of the kiln dust storage building.

Classification: Moderate

Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
5C THSC Chapter 382 382.085(b)

Rqmt Prov: General Condition No. 14 PERMIT
Special Condition No. 8 PERMIT

Description: Failed to keep the roll-up doors in the Stabilization Buildings closed at all times when stabilization operations are in progress, except when in actual use for ingress and egress of personnel, parts, equipment, and materials or products. Specifically, TCEQ staff observed that the roll-up doors for the Stabilization Building Nos. 2 and 3 were non-operational and unable to be closed on September 26, 2018 and September 27, 2018, respectively.

B. Criminal convictions:

N/A

C. Chronic excessive emissions events:

N/A

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

Item 1	July 16, 2018	(1515526)
Item 2	August 16, 2018	(1521576)

Compliance History Report for CN603247974, RN101445666, Rating Year 2022 which includes Compliance History (CH) components from July 10, 2018, through July 10, 2023.

Item 3	August 21, 2018	(1510793)
Item 4	September 11, 2018	(1528766)
Item 5	October 12, 2018	(1535088)
Item 6	November 19, 2018	(1542943)
Item 7	December 18, 2018	(1546684)
Item 8	January 08, 2019	(1537785)
Item 9	January 10, 2019	(1564161)
Item 10	February 14, 2019	(1548920)
Item 11	March 19, 2019	(1564160)
Item 12	April 08, 2019	(1573315)
Item 13	April 18, 2019	(1555481)
Item 14	April 19, 2019	(1555508)
Item 15	April 23, 2019	(1556017)
Item 16	May 02, 2019	(1557325)
Item 17	May 17, 2019	(1586237)
Item 18	July 15, 2019	(1594661)
Item 19	August 15, 2019	(1600962)
Item 20	September 18, 2019	(1607879)
Item 21	September 30, 2019	(1597758)
Item 22	October 08, 2019	(1614744)
Item 23	December 02, 2019	(1611547)
Item 24	December 17, 2019	(1627883)
Item 25	January 16, 2020	(1635510)
Item 26	February 03, 2020	(1625419)
Item 27	February 07, 2020	(1642127)
Item 28	February 18, 2020	(1630662)
Item 29	March 17, 2020	(1648639)
Item 31	April 06, 2020	(1638625)
Item 32	April 17, 2020	(1654994)
Item 33	April 21, 2020	(1643891)
Item 35	April 29, 2020	(1638660)
Item 36	May 04, 2020	(1661553)
Item 38	June 10, 2020	(1668087)
Item 39	July 09, 2020	(1675034)
Item 40	August 11, 2020	(1681801)
Item 41	September 02, 2020	(1688380)
Item 42	November 09, 2020	(1716805)
Item 43	December 15, 2020	(1716806)
Item 44	January 12, 2021	(1716807)
Item 45	January 29, 2021	(1700906)
Item 46	February 10, 2021	(1729886)
Item 47	February 23, 2021	(1702747)
Item 48	March 15, 2021	(1729887)
Item 49	April 07, 2021	(1729888)
Item 52	June 03, 2021	(1723155)
Item 53	June 17, 2021	(1736337)
Item 54	July 13, 2021	(1753140)
Item 55	July 16, 2021	(1739881)
Item 56	August 13, 2021	(1758545)
Item 58	August 31, 2021	(1705769)
Item 59	September 01, 2021	(1708220)
Item 60	September 02, 2021	(1767837)
Item 61	October 15, 2021	(1778400)
Item 62	November 17, 2021	(1785071)
Item 63	November 29, 2021	(1765837)
Item 64	December 07, 2021	(1792104)
Item 65	January 13, 2022	(1799953)
Item 66	February 16, 2022	(1807785)
Item 67	March 02, 2022	(1814828)
Item 68	April 12, 2022	(1805676)

Item 69	April 14, 2022	(1821397)
Item 70	May 02, 2022	(1830294)
Item 71	May 03, 2022	(1811500)
Item 72	June 18, 2022	(1836544)
Item 74	July 01, 2022	(1843729)
Item 75	July 14, 2022	(1826314)
Item 76	August 05, 2022	(1849891)
Item 77	September 19, 2022	(1857660)
Item 78	October 04, 2022	(1864014)
Item 79	November 11, 2022	(1870923)
Item 80	January 04, 2023	(1883590)
Item 81	February 02, 2023	(1891404)
Item 82	March 02, 2023	(1899977)
Item 83	March 04, 2023	(1880713)
Item 84	March 31, 2023	(1888037)
Item 85	April 03, 2023	(1906777)
Item 86	May 04, 2023	(1896315)

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

A notice of violation represents a written allegation of a violation of a specific regulatory requirement from the commission to a regulated entity. A notice of violation is not a final enforcement action, nor proof that a violation has actually occurred.

1	Date:	11/30/2022	(1876780)		
	Self Report?	YES		Classification:	Moderate
	Citation:	2D TWC Chapter 26, SubChapter A 26.121(a) 30 TAC Chapter 305, SubChapter F 305.125(1)			
	Description:	Failure to meet the limit for one or more permit parameter			

F. Environmental audits:

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 Permit No. 50052

TCEQ INDUSTRIAL HAZARDOUS WASTE PERMIT NO. 50052

**APPLICATION BY
US ECOLOGY TEXAS, INC.
FOR CLASS 3 MODIFICATION OF
IHW PERMIT NO. 50052**

§
§
§
§

**BEFORE THE
TEXAS COMMISSION ON
ENVIRONMENTAL QUALITY**

EXECUTIVE DIRECTOR'S RESPONSE TO PUBLIC COMMENT

The Executive Director of the Texas Commission on Environmental Quality (the Commission or TCEQ) files this Response to Public Comment (Response) on the application by US Ecology Texas, Inc. (USET) for a Class 3 modification of Industrial and Hazardous Waste (IHW) Permit No. 50052 (Application) and the Executive Director's preliminary decision. Before an application is approved, Title 30, Texas Administrative Code (30 TAC), Section (§) 55.156 requires that the Executive Director prepare a response to all timely, relevant and material, or significant comments received.

This Response addresses all timely public comments received during the public comment period, whether or not withdrawn.

I. Public Comments Received

The TCEQ Office of the Chief Clerk received timely public comments from Elida Castillo and Christopher Phelan.

II. Background

A. Facility Description

USET owns and operates a commercial hazardous and non-hazardous industrial solid waste management facility, which is authorized to accept waste from off-site sources on a commercial basis for storage, processing, and disposal. The facility is located on a 473-acre tract of land at 3277 County Road 69, Robstown, Texas 78380.

B. Coastal Management Plan.

The facility is located within the drainage area of Segment Petronila Creek Tidal of the Nueces-Rio Grande Coastal Basin (North Latitude 27°43'43", West Longitude 97°39'28"), an area subject to the Texas Coastal Management Program (CMP). The Executive Director reviewed this action for consistency with the goals and policies of the CMP in accordance with the regulations of the Coastal Coordination Council and determined that the Final Draft Permit, if issued, would meet the CMP goals and policies.

C. Application Description

USET applied to the TCEQ for a Class 3 modification of Hazardous Waste Permit No. 50052 to authorize an increase in the capacity of outdoor Container Storage Area (Unit No. 9), add additional waste codes for management in permitted tank systems (Tank Unit Nos. WT-1 through WT-4), add twenty-two (22) new Tanks (proposed Unit Nos. DW-01 through DW-22), for storage and processing, add a new shredder unit (proposed Miscellaneous Unit No. 2), and to reformat the application and table information to comply with TCEQ formatting requirements. This Application is classified as a Class 3 permit modification under 30 TAC §§ 305.69(k), 305.69(k)(F)(1)(a), 305.69(k)(G)(1)(a), and 305.69(k)(G)(5)(a) because the requested changes would authorize increased Container Storage Area storage capacity, add new Tanks, add a new Miscellaneous Unit, and add waste codes that require different management practices.

D. Procedural Background

The Executive Director received the Application from USET on November 28, 2022. The Executive Director declared the Application administratively complete on January 9, 2023. The Notice of Receipt of Application and Intent (NORI) to Obtain Permit was published on January 18, 2023, in the *Corpus Christi Caller Times*. The USET held an applicant-held public meeting on February 28, 2023. The Executive Director completed the technical review of the Application and issued the Final Draft Permit on August 8, 2023. The Notice of Application and Preliminary Decision (NAPD) was published on August 22, 2023, in the *Corpus Christi Caller Times*. The public comment period for the Application closed on October 6, 2023. The technically complete Application and the Executive Director's Preliminary Decision are available for review and copying at the Nueces County Keach Family Library located at 1000 Terry Shamsie Blvd., Robstown, Nueces County, Texas 78380.

The Application was received after September 1, 2015. Therefore, it is subject to the procedural requirements of and rules implementing Senate Bill 709 (84th Legislature, 2015).

III. Access to Rules, Laws, and Information

- The Texas Secretary of State website is sos.state.tx.us.
- TCEQ rules in Title 30 of the Texas Administrative Code are available at sos.state.tx.us/tac/ by selecting "View the current Texas Administrative Code" on the right, and then selecting "Title 30 Environmental Quality."
- Texas statutes are available at statutes.capitol.texas.gov.
- Federal rules in Title 40 of the Code of Federal Regulations are available at the EPA's public website at epa.gov/laws-regulations/regulations.

- Federal environmental laws are available at the EPA's public website at epa.gov/laws-regulations/laws-and-executive-orders.
- General information about the TCEQ and information about the hazardous and industrial solid waste permitting process is available at the Commission's public website at <https://www.tceq.texas.gov>.
- Information about the industrial solid waste and municipal hazardous waste permitting process is available from the TCEQ Public Education Program at 1-800-687-4040.
- Certain records including Part A of the Application, the Technical Summary and Executive Director's Preliminary Decision, the Final Draft Permit, the public notices, and public comments received, are available for viewing and copying at 12100 Park 35 Circle, in Austin Texas, in the Office of the Chief Clerk, on the first floor of Building F. Certain documents located in the Office of the Chief Clerk may also be accessed on the Commissioner's Integrated Database at www14.tceq.texas.gov/epic/eCID/.
- You may receive a paper copy of this Response by contacting the TCEQ Office of the Chief Clerk, at 512-239-3300.

IV. Comments and Responses

Comment No. 1:

Elida Castillo commented that the scheduled time of the applicant-held public meeting for this application was inconvenient for the public. Elida Castillo commented that the public has not been provided adequate information on the application, requested that the public be told what the amendment means for the community, and requested additional time for the public to study the application. Christopher Phelan commented that the TCEQ process is inadequate and raised concerns that USET has submitted multiple applications, including applications for expansions, and stated that there are 22 volumes of applications located at the public library. Christopher Phelan commented that he was unable to attend the applicant-held public meeting because of his health.

Response No. 1:

The Executive Director is the administrator of Texas' hazardous waste program which is authorized by the Environmental Protection Agency as being at least equivalent to the federal hazardous waste regulations. The Executive Director conducts an administrative review and a technical review of the Application for new, renewal, and Class 3 modifications for a hazardous waste management facility to determine whether the Application satisfies the regulatory requirements of Texas' approved hazardous waste program and Texas' state industrial solid waste program in 30 TAC Chapters 37, 39, 60, 281, 305 and 335.

An applicant for a Class 3 modification is required to provide public notice of the application and hold an applicant-held public meeting in accordance with 30 TAC § 39.509(b) and (c), and 305.69(d)(4). The requirements for the applicant-held public meeting do not dictate which days of the week or at what times an applicant-held public meeting may be held.

The notice and public participation requirements for a Class 3 Modification application allow the public access to the application from the date NORI is published through the technical review period and for an additional 30-day public comment period. (30 TAC §§ 39.418, 39.419, and 39.509).

An applicant is required to place a copy of an application for a Class 3 modification in a public place for viewing and copying in accordance with 30 TAC §§ 39.411(b)(8), 39.418(b)(3), 39.509 and 305.69(d)(3). Additionally, an applicant for a Class 3 modification must provide evidence of publication of the initial notice (NORI), and of the final notice (NAPD) after the executive director has completed the technical review. Following publication of the NAPD, the owner or operator must place the Technical Summary and Executive Director's Preliminary Decision, and the Final Draft Permit in a public place for viewing and copying.

The Applicant submitted information demonstrating that it held an applicant-held public meeting on February 28, 2023. Additionally, the Applicant submitted evidence that it published the NORI, published the NAPD, and placed a copy of the Application for the public to review and copy in the Nueces County Keach Family Library, 1000 Terry Shamsie Boulevard, Robstown, Texas. Additional information regarding the public notice for this application is available under Section II.D, Procedural Background, above.

The owner or operator of a permitted hazardous waste facility must submit a renewal application 180 days before the expiration date of the effective permit in accordance with 30 TAC § 305.65. The owner or operator of a permitted hazardous waste facility must submit a modification application to authorize any changes to the permitted facility in accordance with 30 TAC § 305.69. Therefore, in the ordinary course of business operations an owner or operator of a hazardous waste facility may have submitted one or more applications that are under administrative review, technical review, subject to a comment period, subject to a contested case hearing before the State Office of Administrative Hearings, or subject to consideration by the TCEQ Commissioners at a regularly scheduled public agenda meeting. Depending on where an application is in the procedural process, a permittee may be required to make multiple applications available at a public place for review and copying by the public at the same time.

On March 13, 2023, the Executive Director received an application from USET requesting a 10-year renewal of IHW Permit No. 50052. The renewal application is under technical review.

On November 28, 2022, the Executive Director received this Application for a Class 3 modification.

On March 20, 2023, the Executive Director received an application from USET requesting a new Class 3 modification. USET withdrew this application on July 28, 2023.

The Executive Director has reviewed the Application, the public notices and the affidavits of publication and determined that the applicant-held public meeting and the public notice meet the regulatory requirements.

Comment No. 2:

Elida Castillo commented that Robstown is an environmental justice community.

Response No. 2:

TCEQ and the United States Environmental Protection Agency (EPA) coordinate on the rules and policies of both agencies, and the EPA has primary jurisdiction over Title VI and environmental justice concerns. EPA's webpage, <https://www.epa.gov/environmentaljustice>, notes that environmental justice is the fair treatment and meaningful involvement of all people regardless of race, color, national origin, or income with respect to the development, implementation, and enforcement of environmental laws, regulations, and policies.

TCEQ is committed to protecting human health and the environment for all Texans throughout the state. When evaluating permits that would authorize treatment, storage, and disposal facilities, TCEQ considers the surrounding community without regard to its socioeconomic or racial status. The TCEQ Office of the Chief Clerk works to help citizens and neighborhood groups participate in the regulatory process to ensure that agency programs that may affect human health or the environment operate without discrimination and to make sure that citizens' concerns are considered thoroughly and are handled in a way that is fair to all. For more information on Environmental Justice, individuals may contact the Office of the Chief Clerk at 512-239-3300 or visit TCEQ's webpage, Title VI Compliance at TCEQ at tceq.texas.gov/agency/decisions/participation/title-vi-compliance.

Comment No. 3:

Christopher Phelan commented that the USET operator does not keep the waste that it receives inside of the facility fence line.

Response No. 3:

It is not clear which concerns that this comment raises. Generally, the transportation of industrial and hazardous waste must comply with the transportation requirements in 30 TAC Chapter 335 Subchapters A and D which are outside of the scope of the Application. Also generally, a hazardous waste permit depicts the

permitted facility boundary, requires an operator to implement perimeter security, and requires an operator to store industrial and hazardous waste in regulated units.

A permitted hazardous waste treatment, disposal, and storage facility is required to comply with the facility Waste Analysis Plan (WAP) required by 40 Code of Federal Regulations § 264.13 and 30 TAC § 335.152(a)(1). The WAP must contain detailed information on treatment, storage, and disposal of wastes generated on-site and received from off-site.

The Application WAP includes information and forms regarding how incoming waste is profiled, pre-shipment, representative samples, waste stream evaluation, inspection and verification of waste streams expected to be received, and hazardous waste manifesting, record keeping, and reporting requirements. (Part B Application, Appendix IV.1., Waste Analysis Plan). The WAP also includes information on waste prohibited from being accepted at the facility, waste authorized to be accepted by the facility, waste generated and managed at the facility, waste analytical and testing requirements, and on-site waste management requirements. (Part B Application, Appendix IV.1., Waste Analysis Plan). The WAP states that any wastes that are received from off-site facilities or that do not comply with the WAP requirements will be rejected and will either be sent back to the generator or sent to another authorized facility at the direction of the generator. Any wastes received and accepted by the facility shall be immediately moved (relocated) stored, treated, and disposed of in accordance with the permit. The WAP also states that no wastes shall be stored outside the facility unless wastes are in transshipment or are being loaded or unloaded from transportation vehicles and that all wastes must be secured and managed in accordance with permit requirements and applicable state and federal rules. (Part B Application, Appendix IV.1., Waste Analysis Plan)

IHW Permit 50052, Section IV, incorporates, and requires USET to comply with, the approved WAP in the Application. The WAP sets out Authorized and Prohibited Wastes and Sampling and Analysis requirements. Permit Table IV.B lists authorized wastes managed at the facility, and Table IV.C. lists sampling location and methods, frequency of testing, parameters, and analytical methods used for characterizing the wastes. Section V of the permit includes requirements for waste management units for storage, processing, and disposal.

The Application does not propose any changes to the Waste Analysis Plan, the permitted facility boundary, or the perimeter security measures required by current IHW Permit No. 50052, and the Final Draft Permit would not amend any provisions regarding the WAP, the permitted facility boundary, or perimeter security measures.

Additional information regarding compliance concerns is available under Response No. 4.

The Executive Director has reviewed the Application and determined that it meets the regulatory requirements.

Comment No. 4:

Christopher Phelan commented that on February 24, 2022, a hazardous materials incident reported to Corpus Christi dispatch provided the USET facility address but misidentified the facility as Texas Oncology. Christopher Phelan elaborated that a follow-up call was received for mutual aid and more assets, that no one in the surrounding area was notified of the hazardous materials incident, and that no reverse alert was sent to the community. Christopher Phelan commented that he observed hazardous material on the ground and that he took photographs of what appeared to be firefighting runoff leaving the USET property, raised concern regarding management of the facility, and recommended that the facility be audited.

Response No. 4:

USET is required to implement the facility's contingency plan in IHW Permit No. 50052 in response to emergencies such as fires or explosions in accordance with 40 CFR, Part 264, Subpart D, and 30 TAC § 335.152(a)(1). Additionally, USET is required to document attempts to coordinate with local emergency responders and officials in accordance with 40 CFR §§ 264.37 and 264.52(c) and 30 TAC § 335.152(a)(1).

The Application Contingency Plan describes measures facility personnel are required to follow when emergency situations occur at the facility including assessment of incidents and hazards, incident containment, response actions, incident reporting, facility evacuation, and remedial actions. (Application Section III.E, and Attachment III.4, Contingency Plan). The Application includes coordination agreements and describes arrangements with local authorities. (Application Attachment III.4, and Table III.E.1).

Section II.B.4 of the IHW Permit No. 50052 requires USET to report any noncompliance which may endanger human health or the environment in accordance with 30 TAC § 305.125(9), and Section II.B.5. requires twenty-four-hour reporting of any 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, in accordance with 30 TAC § 305.145. Section III.E. of the permit requires the facility to implement a contingency plan to address emergency situations at the facility in accordance with 40 CFR Part 264, Subpart D, which is adopted by reference in 30 TAC § 335.152(a)(3).

Additionally, a person is prohibited from allowing the processing or disposal of industrial solid waste in such a manner as to cause the creation or maintenance of a nuisance. (30 TAC § 335.4). Further, the issuance of a permit by the Commission does not authorize any injury to persons or property or an invasion of other property rights, or any infringement of state or local law or regulation in accordance with 30 TAC § 305.122(d).

The TCEQ Office of Compliance and Enforcement monitors compliance with environmental regulations and issued authorizations by conducting scheduled inspections and responding complaints received from the public. Individuals are encouraged to report their concerns regarding suspected noncompliance with terms of

any TCEQ permit or environmental regulation by contacting the TCEQ Corpus Christi Regional Office (Region 14) at 361-881-6900 or by calling TCEQ's 24-hour toll-free Environmental Complaints Hotline at 1-888-777-3186 or by submitting a complaint online at the following webpage, <https://www.tceq.texas.gov/compliance/complaints/>. TCEQ investigates all complaints. If a person or facility is found to be out of compliance with the terms and conditions of a permit or other authorization, rule, or law the person or facility may be subject to enforcement action. The Commission may utilize citizen collected evidence in compliance with 30 TAC § 70.4 (regarding Enforcement Action Using Information Provided by Private Individual).

The Application does not propose any changes to the facility contingency plan incorporated by reference into current IHW permit No. 50052 and the Final Draft Permit would not amend any provisions regarding the contingency plan.

The Executive Director has reviewed the facility compliance history summary and determined that the compliance history summary does not prevent the Commission from issuing the permit modification.

Comment No. 5:

Elida Castillo recommends denial of the application.

Response No. 5:

The Commission acknowledges this comment.

V. Changes Made to the Draft Permit in Response to Comments

No changes have been made in response to public comment.

VI. Conclusion

The Executive Director has reviewed the Application and determined that it meets the regulatory and statutory requirements.

Respectfully submitted,

Texas Commission on Environmental Quality

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REPRESENTING THE EXECUTIVE
DIRECTOR OF THE TEXAS COMMISSION
ON ENVIRONMENTAL QUALITY

CERTIFICATE OF SERVICE

I certify that on November 09, 2023, the “Executive Director’s Response to Public Comment” on the application by US Ecology Texas, Inc, for Industrial Hazardous Waste Permit No. 50052 was filed with the Texas Commission on Environmental Quality’s Office of the Chief Clerk.



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