



Texas Commission on Environmental Quality Waste Permits Division Correspondence Cover Sheet

Date: 1/27/26

Facility Name: Blanchard Refining LTF

Permit or Registration No.: 50183

Nature of Correspondence:

Initial/New

Response/Revision to TCEQ Tracking No.: 32495044 (from subject line of TCEQ letter regarding initial submission)

Affix this cover sheet to the front of your submission to the Waste Permits Division. Check appropriate box for type of correspondence. Contact WPD at (512) 239-2335 if you have questions regarding this form.

Table 1 - Municipal Solid Waste Correspondence

Applications	Reports and Notifications
<input type="checkbox"/> New Notice of Intent	<input type="checkbox"/> Alternative Daily Cover Report
<input type="checkbox"/> Notice of Intent Revision	<input type="checkbox"/> Closure Report
<input type="checkbox"/> New Permit (including Subchapter T)	<input type="checkbox"/> Compost Report
<input type="checkbox"/> New Registration (including Subchapter T)	<input type="checkbox"/> Groundwater Alternate Source Demonstration
<input type="checkbox"/> Major Amendment	<input type="checkbox"/> Groundwater Corrective Action
<input type="checkbox"/> Minor Amendment	<input type="checkbox"/> Groundwater Monitoring Report
<input type="checkbox"/> Limited Scope Major Amendment	<input type="checkbox"/> Groundwater Background Evaluation
<input type="checkbox"/> Notice Modification	<input type="checkbox"/> Landfill Gas Corrective Action
<input type="checkbox"/> Non-Notice Modification	<input type="checkbox"/> Landfill Gas Monitoring
<input type="checkbox"/> Transfer/Name Change Modification	<input type="checkbox"/> Liner Evaluation Report
<input type="checkbox"/> Temporary Authorization	<input type="checkbox"/> Soil Boring Plan
<input type="checkbox"/> Voluntary Revocation	<input type="checkbox"/> Special Waste Request
<input type="checkbox"/> Subchapter T Disturbance Non-Enclosed Structure	<input type="checkbox"/> Other:
<input type="checkbox"/> Other:	

Table 2 - Industrial & Hazardous Waste Correspondence

Applications	Reports and Responses
<input type="checkbox"/> New	<input type="checkbox"/> Annual/Biennial Site Activity Report
<input type="checkbox"/> Renewal	<input type="checkbox"/> CPT Plan/Result
<input type="checkbox"/> Post-Closure Order	<input type="checkbox"/> Closure Certification/Report
<input type="checkbox"/> Major Amendment	<input type="checkbox"/> Construction Certification/Report
<input type="checkbox"/> Minor Amendment	<input type="checkbox"/> CPT Plan/Result
<input type="checkbox"/> CCR Registration	<input type="checkbox"/> Extension Request
<input type="checkbox"/> CCR Registration Major Amendment	<input type="checkbox"/> Groundwater Monitoring Report
<input type="checkbox"/> CCR Registration Minor Amendment	<input type="checkbox"/> Interim Status Change
<input checked="" type="checkbox"/> Class 3 Modification	<input type="checkbox"/> Interim Status Closure Plan
<input type="checkbox"/> Class 2 Modification	<input type="checkbox"/> Soil Core Monitoring Report
<input type="checkbox"/> Class 1 ED Modification	<input type="checkbox"/> Treatability Study
<input type="checkbox"/> Class 1 Modification	<input type="checkbox"/> Trial Burn Plan/Result
<input type="checkbox"/> Endorsement	<input type="checkbox"/> Unsaturated Zone Monitoring Report
<input type="checkbox"/> Temporary Authorization	<input type="checkbox"/> Waste Minimization Report
<input type="checkbox"/> Voluntary Revocation	<input type="checkbox"/> Other:
<input type="checkbox"/> 335.6 Notification	
<input checked="" type="checkbox"/> Other: Admin NOD1 for Class3 Mod	



Texas Commission on Environmental Quality

Waste Permits Division Correspondence

Cover Sheet

Date: 12/30/2025

Facility Name: Blanchard Refining LTF

Permit or Registration No.: 50183

Nature of Correspondence:

Initial/New

Response/Revision to TCEQ Tracking No.:
 _____ (from subject line of TCEQ letter
 regarding initial submission)

Affix this cover sheet to the front of your submission to the Waste Permits Division. Check appropriate box for type of correspondence. Contact WPD at (512) 239-2335 if you have questions regarding this form.

Table 1 - Municipal Solid Waste Correspondence

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<input type="checkbox"/> New Registration (including Subchapter T)	<input type="checkbox"/> Groundwater Alternate Source Demonstration
<input type="checkbox"/> Major Amendment	<input type="checkbox"/> Groundwater Corrective Action
<input type="checkbox"/> Minor Amendment	<input type="checkbox"/> Groundwater Monitoring Report
<input type="checkbox"/> Limited Scope Major Amendment	<input type="checkbox"/> Groundwater Background Evaluation
<input type="checkbox"/> Notice Modification	<input type="checkbox"/> Landfill Gas Corrective Action
<input type="checkbox"/> Non-Notice Modification	<input type="checkbox"/> Landfill Gas Monitoring
<input type="checkbox"/> Transfer/Name Change Modification	<input type="checkbox"/> Liner Evaluation Report
<input type="checkbox"/> Temporary Authorization	<input type="checkbox"/> Soil Boring Plan
<input type="checkbox"/> Voluntary Revocation	<input type="checkbox"/> Special Waste Request
<input type="checkbox"/> Subchapter T Disturbance Non-Enclosed Structure	<input type="checkbox"/> Other:
<input type="checkbox"/> Other:	

Table 2 - Industrial & Hazardous Waste Correspondence

Applications	Reports and Responses
<input type="checkbox"/> New	<input type="checkbox"/> Annual/Biennial Site Activity Report
<input type="checkbox"/> Renewal	<input type="checkbox"/> CPT Plan/Result
<input type="checkbox"/> Post-Closure Order	<input type="checkbox"/> Closure Certification/Report
<input type="checkbox"/> Major Amendment	<input type="checkbox"/> Construction Certification/Report
<input type="checkbox"/> Minor Amendment	<input type="checkbox"/> CPT Plan/Result
<input type="checkbox"/> CCR Registration	<input type="checkbox"/> Extension Request
<input type="checkbox"/> CCR Registration Major Amendment	<input type="checkbox"/> Groundwater Monitoring Report
<input type="checkbox"/> CCR Registration Minor Amendment	<input type="checkbox"/> Interim Status Change
<input checked="" type="checkbox"/> Class 3 Modification	<input type="checkbox"/> Interim Status Closure Plan
<input type="checkbox"/> Class 2 Modification	<input type="checkbox"/> Soil Core Monitoring Report
<input type="checkbox"/> Class 1 ED Modification	<input type="checkbox"/> Treatability Study
<input type="checkbox"/> Class 1 Modification	<input type="checkbox"/> Trial Burn Plan/Result
<input type="checkbox"/> Endorsement	<input type="checkbox"/> Unsaturated Zone Monitoring Report
<input type="checkbox"/> Temporary Authorization	<input type="checkbox"/> Waste Minimization Report
<input type="checkbox"/> Voluntary Revocation	<input type="checkbox"/> Other:
<input type="checkbox"/> 335.6 Notification	
<input type="checkbox"/> Other:	



Jan Werner, P.E.
Environmental Manager
Galveston Bay Refinery

Blanchard Refining Company LLC

A subsidiary of Marathon Petroleum Company LP

P. O. Box 401
2401 5th Avenue South
Texas City, TX 77592
Tel: 409.945.1011

January 23, 2025

Mr. Martin Torres
IHW Permits Section
Texas Commission on Environmental Quality
Building F, 5th Floor
12100 Park 35 Circle
Austin, TX 78753

RE: Land Treatment Facility – Class 3 Permit Modification Application – Frac2 Construction
Response to Administrative NOD 1
Blanchard Refining Company, L.L.C
Industrial Solid Waste Registration No. 34507
Hazardous Waste Permit No. HW-50183

Dear Mr. Torres,

Please find an original and one copy of responses to the Administrative Notice of Deficiency Letter (Admin NOD1) dated January 13, 2026, related to the Class 3 permit modification application Blanchard submitted December 23, 2025.

If you have any questions, please contact Todd Palmer at (409) 943-7248 or TBPalmer@MarathonPetroleum.com.

Sincerely,

A handwritten signature in cursive that reads "Todd Palmer for".

Jan Werner, P.E.
Environmental Manager
Blanchard Refining Company LLC

Enclosures
Administrative NOD1 Response



Jan Werner, P.E.
Environmental Manager
Galveston Bay Refinery

Blanchard Refining Company LLC

A subsidiary of Marathon Petroleum Company LP

P. O. Box 401
2401 5th Avenue South
Texas City, TX 77592
Tel: 409.945.1011

December 22, 2025

Mr. Martin Torres
IHW Permits Section
Texas Commission on Environmental Quality
Building F, 5th Floor
12100 Park 35 Circle
Austin, TX 78753

RE: Land Treatment Facility – Class 3 Permit Modification Application – Frac2 Construction
Blanchard Refining Company, L.L.C
Industrial Solid Waste Registration No. 34507
Hazardous Waste Permit No. HW-50183

Dear Mr. Torres,

Blanchard Refining Company L.L.C. (Blanchard) is herein submitting a Class 3 permit modification application regarding proposed construction of a natural gas liquids (NGL) processing facility (termed Frac2) on closed cells of the above-referenced permitted land treatment facility (LTF) in Texas City, Texas. In March 2025, TCEQ approved a Class 3 permit modification for the construction of an NGL facility (termed Frac1) at the same LTF; the development of the Frac1 project is in progress. Blanchard is also submitting under separate cover confidential material for Section XIII of the application, related to Financial Capability requirements.

Blanchard will be in communication with the TCEQ during the application review process and provide additional information as needed.

If you have any questions, please contact Todd Palmer at (409) 943-7248 or

[REDACTED] Sincerely,

Todd Palmer for

Jan Werner, P.E.
Environmental Manager
Blanchard Refining Company LLC

Enclosures
Class 3 Permit Modification Application



Texas Commission on Environmental Quality
Plain Language Summary

Industrial and Hazardous Waste Permit Applications

Instructions: Complete this form and submit with any industrial hazardous waste, or industrial solid waste, permit application that is subject to 30 Texas Administrative Code [§39.405\(k\)](#) [applications for a Class 3 permit modification, permit amendment, permit renewals, and for a new permit]. Please be concise.

Application Information	
Purpose of application: <input type="checkbox"/> New <input type="checkbox"/> Renewal <input checked="" type="checkbox"/> Modification/Amendment	
Date Submitted to TCEQ: 12/30/2025	
Customer Name: Blanchard Refining Company LLC	
Facility Name: Blanchard Refining Land Treatment Facility	
CN: 604166868	RN: 104085691
Permit Number: 50183	Solid Waste Registration Number: 34507
Facility Street Address: Loop 197 S between HWY 6 and 519 Texas City TX 77590	
Weblink to Street Address: https://maps.app.goo.gl/qAPTuTJfKQ1zHsmD8	
Facility Information <i>(check all that apply)</i>	
What is the primary type of business?	<input type="checkbox"/> Chemical manufacturing <input type="checkbox"/> Oil refinery <input type="checkbox"/> Treatment, storage or disposal facility plant <input checked="" type="checkbox"/> Other If other, enter description: Land treatment facility for refinery
What does the facility produce?	<input type="checkbox"/> Chemicals <input type="checkbox"/> Fuels / lubricants <input checked="" type="checkbox"/> No products <input type="checkbox"/> Other If other, enter description:
Waste Management Information <i>(check all that apply)</i>	
What types of wastes are managed?	<input checked="" type="checkbox"/> Nonhazardous industrial <input type="checkbox"/> Hazardous <input type="checkbox"/> Other If other, enter description:
Where does the waste come from?	<input checked="" type="checkbox"/> Off-site source <input type="checkbox"/> On-site source
How is the waste managed?	<input type="checkbox"/> Storage <input checked="" type="checkbox"/> Process / Treatment <input type="checkbox"/> Disposal <input type="checkbox"/> Other If other, enter description:
What type of units manage the waste?	<input checked="" type="checkbox"/> Active <input type="checkbox"/> Post-Closure Type and count: Land treatment facility - 11 active cells
What happens to waste managed at the facility?	<input type="checkbox"/> Transported off-site <input checked="" type="checkbox"/> Disposed on-site <input type="checkbox"/> Other If other, enter description:

Pollution Control Methods <i>(check all that apply)</i>	
How will the facility prevent spills, leaks, and releases?	<input checked="" type="checkbox"/> Routine inspections <input type="checkbox"/> Engineered liner systems <input type="checkbox"/> Spill containment <input checked="" type="checkbox"/> Proper waste handling <input type="checkbox"/> Operations in enclosed buildings <input type="checkbox"/> Groundwater monitoring <input type="checkbox"/> Other If other, enter description:
How will the facility clean up spills, leaks, and releases?	<input checked="" type="checkbox"/> Spill clean-up supplies <input checked="" type="checkbox"/> Decontamination equipment <input type="checkbox"/> Other If other, enter description:
How will the facility prevent / minimize air emissions?	<input type="checkbox"/> Air monitoring / control systems <input type="checkbox"/> Filters / scrubbers <input type="checkbox"/> Routine inspections <input checked="" type="checkbox"/> Proper waste handling <input type="checkbox"/> Operations in enclosed buildings <input type="checkbox"/> Other If other, enter description:

Description of Update *(for Class 3 Modifications and Amendments only)*

List and explain any changes this modification or amendment would make to the two sections above—**Waste Management Information** and **Pollution Control Methods**.

Updating General Engineering Report, Closure Plan, and Financial Assurance documents related to construction of an additional Gas Processing Unit (Frac2) over closed landfarm cells.

Clear Form



Resumen en Lenguaje Sencillo

Solicitudes de Permisos de Desechos Industriales y Peligrosos

Instrucciones

Complete este formulario y envíe con cualquier solicitud de permiso de desechos industriales peligrosos, o desechos sólidos industriales, que esté sujeta al Código Administrativo [de Texas 30 §39.405 \(k\)](#) [es decir, solicitudes para una modificación de permiso de Clase 3, enmienda de permiso, renovaciones de permisos y para un nuevo permiso].

Sea conciso: toda la información debe caber en dos páginas.

Información de la Solicitud

Propósito de la solicitud: Nuevo Renovación Modificación/Enmienda

Sometido a TCEQ: 12/30/2025

Nombre del Cliente: Blanchard Refining Company LLC

Nombre de la Instalación: Blanchard Refining Land Treatment Facility

CN: 604166868

RN:104085691

Número de Permiso:50183

Número de Registro de Desechos Sólidos: 34507

Dirección de la Instalación: Loop 197 S between HWY 6 and 519 Texas City TX 77590

Enlace Web a la Dirección Postal: <https://maps.app.goo.gl/qAPTuTJfKQ1zHsmD8>

Información de la Instalación *(marque todas lo que correspondan)*

¿Cuál es el tipo principal de negocio? Planta de manufactura química Refinería de aceite Instalación de tratamiento, almacenamiento o eliminación Otro **Si es otro, introduzca la descripción:** Instalación de tratamiento de tierras para la refinería

¿Qué produce la instalación? Químicos Combustibles / lubricantes Sin productos Otro **Si es otro, introduzca la descripción:** Introduzca la descripción

Información sobre la Gestión de Desechos *(marque todas las que correspondan)*

¿Qué tipos de desechos se gestionan? Industrial no peligroso Peligroso Otro **Si es otro, introduzca la descripción:** Introduzca la descripción

¿De dónde provienen los desechos? Fuente externa Fuente interna

¿Cómo se gestionan los desechos? Almacenar Procesar / Tratar Eliminación Otro **Si es otro, introduzca la descripción:**

¿Qué tipo de unidades gestionan los desechos?	<input checked="" type="checkbox"/> Activo <input type="checkbox"/> Postcierre Teclee y cuente: Instalación de tratamiento de tierra - 11 celdas activas
¿Qué sucede con los desechos gestionados en la instalación?	<input type="checkbox"/> Transportados fuera del sitio <input checked="" type="checkbox"/> Eliminado en el sitio <input type="checkbox"/> Otro Si es otro, introduzca la descripción: Introduzca la descripción

Métodos de Control de la Contaminación <i>(marque todos los que correspondan)</i>	
¿Cómo evitará la instalación derrames, fugas y liberaciones?	<input checked="" type="checkbox"/> Inspecciones de Rutina <input type="checkbox"/> Sistemas de revestimiento de ingeniería <input type="checkbox"/> Contención de derrames <input checked="" type="checkbox"/> Manejo adecuado de desechos <input type="checkbox"/> Operaciones en edificios cerrados <input type="checkbox"/> Monitoreo de aguas subterráneas <input type="checkbox"/> Otro Si es otro, introduzca la descripción: Introduzca la descripción
¿Cómo limpiará la instalación los derrames, fugas y liberaciones?	<input checked="" type="checkbox"/> Suministros de limpieza de derrames <input checked="" type="checkbox"/> Equipos de descontaminación <input type="checkbox"/> Otro Si es otro, introduzca la descripción: Introduzca la descripción
¿Cómo evitará / minimizará la instalación las emisiones atmosféricas?	<input type="checkbox"/> Sistemas de monitoreo / control de aire <input type="checkbox"/> Filtros / depuradores <input type="checkbox"/> Inspecciones de rutina <input checked="" type="checkbox"/> Manejo adecuado de desechos <input type="checkbox"/> Operaciones en edificios cerrados <input type="checkbox"/> Otro Si es otro, introduzca la descripción: Introduzca la descripción

Descripción de la Actualización <i>(solo para Modificaciones y Enmiendas de Clase 3)</i>

Liste y explique cualquier cambio que esta modificación o enmienda haría a las dos secciones anteriores: **Información de Gestión de Desechos** y **Métodos de Control de la Contaminación**.
Actualización del Informe General de Ingeniería, el Plan de Cierre y los documentos de Garantía Financiera relacionados con la construcción de una Unidad de Procesamiento de Gas adicional (Frac2) sobre celdas de tratamiento de tierra cerradas.



Texas Commission on Environmental Quality Instructions and Procedural Information for Filing a Permit Application for a Hazardous Waste Storage, Processing, or Disposal Facility

Part A

[Form Availability: This form, as well as other Industrial and Hazardous Waste documents, is available on the Internet World Wide Web, Industrial and Hazardous Waste home page at address https://www.tceq.texas.gov/permitting/waste_permits/ihw_permits]

General Instructions

1. A person (individual, corporation or other legal entity) who stores, processes or disposes of hazardous waste (except where such storage and/or processing is excluded from permit requirements in accordance with 30 Texas Administrative Code (TAC) Section 335.2) must obtain a permit pursuant to the Texas Health and Safety Code. In applying to the Texas Commission on Environmental Quality, hereafter referred to as the Commission, the applicant shall follow the procedures outlined below, on the application and in the Rules of the Commission.
2. The application (one original plus three (3) complete copies¹) should be mailed to:

Texas Commission on Environmental Quality
Attention: Waste Permits Division, MC126
P. O. Box 13087
Austin, Texas 78711-3087
3. Signature on Application [30 TAC 305.44]. The application shall be signed by the owner and operator or by a duly authorized agent, employee, officer, or representative of the owner or operator and shall be verified before a notary public. When another person signs on behalf of the owner and operator, this person's title or relationship to the owner or operator should be shown. In all cases, the person signing the form should be authorized to do so by the owner or operator (the Commission may require a person signing on behalf of an owner or operator to provide proof of authorization). An application submitted for a corporation must be signed by (or the signatory must be authorized by) a responsible corporate officer such as a president, secretary, treasurer, vice-president, or designated manager; or for a partnership or sole proprietorship, by a general partner or the proprietor, respectively. In the case of a municipal, state, federal, or other public facility, the application shall be signed by either a principal executive

¹ The third copy may optionally consist of paper copies of all plans and maps and a computer diskette of the remaining document. The document should be formatted in Word processing software up to and including version 6.1 or a 100% compatible format. Files may be compressed using PKZIP Ver. 2 or a 100% compatible program.

officer or ranking elected official.

4. An application will not be processed until all information required to properly evaluate the application has been obtained. When an application is severely lacking in detail and/or the applicant fails to submit additionally requested information in a timely manner, the application will not be considered to be "filed in accordance with the rules and regulations of the Commission."

Please submit any application revisions with a revised date and page numbers at the bottom of the page(s).

5. Fees and Costs
 - a. The fee for filing an application is discussed in Section XII of Part B, form number TCEQ-0376.
 - b. The applicant for a permit is required to bear the cost of publication of notice of the application in a newspaper as prescribed by 30 TAC Section 39.405(f).
6. A person may not commence operation of a hazardous waste management facility until the Commission has issued a permit to authorize the storage, processing, or disposal of hazardous waste, except with the approval of the Commission.
7. Designation of Material as Confidential

The designation of material as confidential is frequently carried to excess. The Commission has a responsibility to provide a copy of each application to other review agencies and to interested persons upon request and to safeguard confidential material from becoming public knowledge. Thus, the Commission requests that the applicant (1) be prudent in the designation of material as confidential and (2) submit such material only when it might be essential to the staff in their development of a recommendation.

The Commission suggests that the applicant NOT submit confidential information as part of the permit application. However, if this cannot be avoided, the confidential information should be described in non-confidential terms throughout the application, and submitted as a document or binder, and conspicuously marked "CONFIDENTIAL."

Reasons of confidentiality include the concept of trade secrecy and other related legal concepts which give a business the right to preserve confidentiality of business information to obtain or retain advantages from its right in the information. This includes authorizations under 18 U.S.C. 1905 and special rules cited in 40 CFR Chapter I, Part 2, Subpart B.

Section 361.037 of the Texas Health and Safety Code does not allow an applicant for an industrial and hazardous waste permit to claim as confidential any record pertaining to the characteristics of the industrial solid waste.

The applicant may elect to withdraw any confidential material submitted with the application. However, the permit cannot be issued, amended, or modified if the application is incomplete.

Part II

Procedural Information

After the submittal of Parts A and B of the application, the TCEQ will provide public notice of receipt of the application. The Executive Director's staff will review the application for completeness of information submitted. During the review, the applicant may be contacted for clarification or additional information. When all pertinent information is present, the application or a summary of its contents will be forwarded for review by other state agencies and local governmental entities interested in water quality control and solid waste management. After technical evaluation, opportunity for public hearing will be afforded.

Note that for facilities which had "commenced on-site storage, processing, or disposal of hazardous waste" [see 30 TAC Section 335.43(b)] on or before the date such waste is identified or listed as hazardous by EPA, the Texas Health and Safety Code provides in Section 361.082(f) that these facilities may continue to manage hazardous waste until such time as the Commission approves or denies the application, provided that the applicant has filed the permit application in accordance with the rules and regulations of the Commission.

The Commission may act upon an application for a permit, permit amendment, permit modification, or renewal of a permit without the necessity of holding a public hearing:

1. (a) When notice of the application has been mailed to persons possibly affected by the proposed permit; and

(b) When notice has been published at least once in a newspaper regularly published or circulated within each county where the proposed facility is located; and

(c) Within forty-five (45) days following publication of the Commission's notice, a Commissioner, the Executive Director or an affected person has not requested a public hearing; or
2. For a Class 1 or a Class 2 permit modification or a minor amendment to a permit. The Commission may, in certain cases, hold a public hearing for a Class 2 permit modification or a minor amendment.

A public hearing may be scheduled on an application for a RCRA hazardous waste permit when requested by a Commissioner, the Executive Director, or an affected person within forty-five (45) days following the newspaper publication.

Requirements of Giving Notice of the Application:

1. By the Applicant: Every applicant for a permit, permit amendment, permit modification, or permit renewal shall publish notice (see note below) of the application at least once in a newspaper regularly published or circulated within each county where the proposed facility is located. Where a public hearing has been requested, notice will be mailed to the applicant in ample time for publication, which shall be not less than thirty (30) days prior to the date set for the hearing. Except in the case of a notice of a permit modification request, the Commission will mail the appropriate notice and instructions for publication to the applicant.

NOTE: Additional publication and direct mail notice to affected persons will result if a public hearing is requested following newspaper publication of the notice of application. The cost of providing this additionally required publication and service of notice to affected persons will be assumed by the applicant.

2. By the Texas Commission on Environmental Quality: The Commission will mail notice of

the application (except for permit modifications) to affected persons and certain governmental entities. The notice will be mailed at the same time instructions for newspaper publications are mailed to the applicant.

3. Bilingual Notice Instructions:

For certain permit applications, public notice in an alternate language is required. If an elementary school or middle school nearest to the facility offers a bilingual program, notice may be required to be published in an alternative language. The Texas Education Code, upon which the TCEQ alternative language notice requirements are based, requires a bilingual education program for an entire school district should the requisite alternative language speaking student population exist. However, there may not be any bilingual-speaking students at a particular school within a district which is required to offer the bilingual education program. For this reason, the requirement to publish notice in an alternative language is triggered if the nearest elementary or middle school, as part of a larger school district, is required to make a bilingual education program available to qualifying students and either the school has students enrolled at such a program on-site, or has students who attend such a program at another location to satisfy the school's obligation to provide such a program.

If it is determined that a bilingual notice is required, the applicant is responsible for ensuring that the publication in the alternate language is complete and accurate in that language. Electronic versions of the Spanish template examples are available from the TCEQ to help the applicant complete the publication in the alternative language.

Bilingual Notice Application Form:

Bilingual notice confirmation for this application:

1. Is the school district of the elementary or middle school nearest to the facility required by the Texas Education Code to have a bilingual program?

YES NO

(If NO, alternative language notice publication not required)

2. If YES to question 1, are students enrolled in a bilingual education program at either the elementary school or the middle school nearest to the facility?

YES NO

(If YES to questions 1 and 2, alternative language publication is required; If NO to question 2, then consider the next question)

3. If YES to question 1, are there students enrolled at either the elementary school or the middle school nearest to the facility who attend a bilingual education program at another location?

YES NO

(If Yes to questions 1 and 3, alternative language publication is required; If NO to question 3, then consider the next question)

4. If YES to question 1, would either the elementary school or the middle school nearest to the facility be required to provide a bilingual education program but for the fact that it secured a waiver from this requirement, as available under 19 TAC 89.1205(g)?

YES NO

(If Yes to questions 1 and 4, alternative language publication is required; If NO to question 4, alternative language notice publication not required)

If a bilingual education program(s) is provided by either the elementary school or the middle school nearest to the facility, which language(s) is required by the bilingual program? Spanish

Consideration of the Permit Application by the Commission:

The applicant will be notified by the Commission when the application is set for final consideration. If the Commission issues the permit, the applicant will be mailed a copy of the permit by the TCEQ Office of the Chief Clerk within one (1) month following Commission approval. (NOTE: Only one copy is mailed to the applicant and that copy will be sent to the official mailing address of the applicant as shown on the permit application form.)

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Texas Commission on Environmental Quality
Permit Application for a Hazardous Waste Storage/Processing/Disposal Facility
Part A - Facility Background Information

I. General Information

A. Facility Name: Blanchard Refining Land Treatment Facility

(Individual, Corporation, or Other Legal Entity Name)

TCEQ Solid Waste Registration No: 34507 EPA I.D. No.: TXD072181381

Street Address (If Available): 2401 5th Ave South

City: Texas City, State: Texas Zip Code: 77590

County: Galveston

Telephone Number: 409-943-7585 Charter Number: 801666290

If the application is submitted on behalf of a corporation, please identify the Charter Number as recorded with the Office of the Secretary of State for Texas.

B. Facility Contact

1. List those persons or firms who will act as primary contact for the applicant during the processing of the permit application. Also indicate the capacity in which each person may represent the applicant (engineering, legal, etc.). The person listed first will be the primary recipient of correspondence regarding this application. Include the complete mailing addresses and phone numbers.

Jan Werner, P.E.
Environmental Manager
Galveston Bay Refinery
P. O. Box 401
2401 5th Avenue South
Texas City, TX 77592
(409)-943-7022

2. If the application is submitted by a corporation or by a person residing out of state, the applicant must register an Agent in Service or Agent of Service with the Texas Secretary of State's office and provide a complete mailing address for the agent. The agent must be a Texas resident.

CT Corporation System.
1999 Bryan Street, Suite 900
Dallas, TX 75201-3136

C. Operator¹: Identify the entity who will conduct facility operations.

Operator Name: Blanchard Refining Company LLC

Address: 2401 5th Ave South

City: Texas City, State: TX Zip Code: 77590

Telephone Number: 409-943-7585 Charter Number: 801666290

D. Owner

1. Indicate the ownership status of the facility:

a. Private _____

- (1) Corporation
- (2) _____ Partnership
- (3) _____ Proprietorship
- (4) _____ Non-profit organization
- (5) _____ Limited Liability Company

b. Public _____

- (1) _____ Federal
- (2) _____ Military
- (3) _____ State
- (4) _____ Regional
- (5) _____ County
- (6) _____ Municipal
- (7) _____ Other (specify)

2. Does the operator own the facility units and facility property?

Yes No

If you checked "no",

- a. Submit as "Attachment A" a copy of the lease for use of or the option to buy said facility units and/or facility property, as appropriate; and
- b. Identify the facility units' owner(s) and/or facility property owner(s). Please note that the owner(s) is/are required to sign the application on page 5.

Owner Name: Blanchard Refining Company LLC

Address: 539 South Main Street

City: Findlay, State: OH Zip Code: 45840

Telephone Number: 419-421-2121

¹ The operator has the duty to submit an application if the facility is owned by one person and operated by another [30 TAC 305.43(b)]. The permit will specify the operator and the owner who is listed on this application [Section 361.087 Texas Health and Safety Code].

E. Type of Application Submittal:

Initial X or Revision _____

F. Registration and Permit Information

Indicate (by listing the permit number(s) in the right-hand column below) all existing or pending State and/or Federal permits or construction approvals which pertain to pollution control or industrial solid waste management activities conducted by your plant or at your location. Complete each blank by entering the *permit number*, or the *date of application*, or "none".

Relevant Program and/or Law	Permit No.	Agency*
1. Texas Solid Waste Disposal Act	<u> 34507 </u>	<u> TCEQ </u>
2. Wastewater disposal under the Texas Water Code	<u> None </u>	_____
3. Underground injection under the Texas Water Code	<u> None </u>	_____
4. Texas Clean Air Act	<u> None </u>	_____
5. Texas Uranium Surface Mining & Reclamation Act	<u> None </u>	_____
6. Texas Surface Coal Mining & Reclamation Act	<u> None </u>	_____
7. Hazardous Waste Management program under the Resource Conservation and Recovery Act	<u> 50183 </u>	<u> TCEQ </u>
8. UIC program under the Safe Drinking Water Act	<u> None </u>	_____
9. TPDES program under the Clean Water Act	<u> WQ0000443000 </u>	<u> TCEQ </u>
10. PSD program under the Clean Air Act	<u> None </u>	_____
11. Nonattainment program under the Clean Air Act	<u> None </u>	_____
12. National Emission Standards for Hazardous Pollutants (NESHAP) Pre-construction approval under the Clean Air Act	<u> None </u>	_____

- | | | |
|--|-------------|-------|
| 13. Ocean dumping permits under the Marine Protection Research and Sanctuaries Act | <u>None</u> | _____ |
| 14. Dredge or fill permits under section 404 of the Clean Water Act | <u>None</u> | _____ |
| 15. Other relevant environmental permits | <u>None</u> | _____ |

*Use the following acronyms for each agency as shown below:

- TCEQ = Texas Commission on Environmental Quality
- TRC = Texas Railroad Commission
- TDH = Texas Department of Health
- TDA = Texas Department of Agriculture
- EPA = U.S. Environmental Protection Agency
- CORPS = U.S. Army Corps of Engineers

G. Give a brief description of the nature of your business.

The Land Treatment Facility uses the process of land treatment for treatment of biological sludges from the refinery wastewater plant, and for treatment of other petroleum-based wastes from historical refinery operations.

H. TCEQ Core Data Form

The TCEQ requires that a Core Data Form (Form 10400) be submitted on all incoming applications. For more information regarding the Core Data Form, call (512) 239-1575 or go to the TCEQ website at http://www.tceq.texas.gov/permitting/central_registry/guidance.html.

Attached

II. Facility Background Information

A. Location of Facility for which the application is submitted

1. Give a description of the location of the facility site with respect to known or easily identifiable landmarks.

Loop 197 S between HWY 6 and 519

2. Detail the access routes from the nearest U.S. or State Highway to the facility.

Loop 197 S between HWY 6 and 519

3. Enter the geographical coordinates of the facility:

Latitude: 29 deg 20 min 37.87 sec

Longitude: -94 deg 55 min 42.19 sec

4. Is the facility located on Indian lands?

Yes No

B. Legal Description of Facility

Submit as "Attachment B" a legal description(s) of the tract or tracts of land upon which the waste management operations referred to in this permit application occur or will occur. Although a legal description is required, a metes and bounds description is not necessary for urban sites with appropriate "lot" description(s). A survey plat or facility plan drawing which shows the specific points referenced in the survey should also be included in Attachment B.

See Attachment B

C. SIC Codes

List, in descending order of significance, the four digit standard industrial classification (SIC) codes which best describe your facility in terms of the principal products or services you produce or provide. Also, specify each classification in words. These classifications may differ from the SIC codes describing the operation generating the hazardous wastes.

4-digit SIC Code	Description
2911	Associated with petroleum refining

SIC code numbers are descriptions which may be found in the Standard Industrial Classification Manual prepared by the Executive Officer of the President, Office of Management and Budget, which is available from the Government Printing Office, Washington, D.C. Use the current edition of the manual.

III. Wastes and Waste Management

A. Waste Generation and Management Activities

Is any hazardous waste [see Title 40, Code of Federal Regulations (CFR), Part 261] presently or proposed to be generated or received at your facility?

Yes No Site is registered as CESQG and is under Delay of Closure status for managing non-hazardous waste. Table III-1 is provided for LTF cells that previously managed hazardous waste.

If no, skip to question Number 2 below.

If yes, answer the following question.

1. Are you presently registered with TCEQ as a solid waste generator?

Yes No Pending

If no, contact the Industrial and Hazardous Waste Division of TCEQ in Austin, Texas to obtain registration information. Also, continue with the application form (go to Number 2 below).

If yes, go to Section I of your TCEQ Notice of Registration, determine which of your wastes are hazardous, and list these wastes (and mixtures) in Table III-1 (see Number 2 below).

2. Complete Table III-1, Hazardous Wastes and Management Activities, below, listing all hazardous wastes, all mixtures containing any hazardous wastes, and hazardous debris which were, are presently, or are proposed to be handled at your facility in interim status or permitted units. See 40 CFR 261 and 268.2, attaching additional copies as necessary.

Guidelines for the Classification & Coding of Industrial Wastes and Hazardous Wastes, TCEQ publication RG-22, contains guidance on how to properly classify and code industrial waste and hazardous waste in accordance with 30 TAC 335.501-335.515 (Subchapter R).

If you are not registered with TCEQ, enter "NA" for TCEQ Waste Code Number.

For the EPA Hazardous Waste Numbers, see 40 CFR 261.20-33. For annual quantity, provide the amount in units of pounds (as generated and/or received) for each waste and/or waste mixture.

B. Waste Management Units Summary

1. For each waste and waste mixture listed in Table III-1 that is stored, processed, and/or disposed on-site (except where such storage and/or processing is excluded from permit requirements in accordance with Texas Administrative Code (TAC) Section 335), complete Table III-2, Hazardous Waste Management Unit Checklist, and enter the name of each hazardous waste management unit (Note: Please make copies of Table III-2 if necessary).

Give the design capacity of each hazardous waste management unit in any of the units of measure shown. In the case of inactive or closed units for which design details are unavailable, an estimate of the design capacity is sufficient.

Please provide a description for each waste management unit described in your own words on the line provided for "Waste Management Unit."

2. Has the applicant at any time conducted the on-site disposal of industrial solid waste now identified or listed as hazardous waste?

Yes No

If yes, complete Table III-2 indicating the hazardous waste management units which were once utilized at your plant site but are no longer in service (i.e., inactive or closed facility units).

If no, and if no hazardous waste is presently or proposed to be stored [for longer than 90 days (see 30 TAC Section 335.53)], processed, or disposed of at your facility, then you need not file this permit application. Otherwise proceed with the application form.

3. Provide an estimate of the total weight (lbs) of hazardous waste material that has been disposed of and/or stored within your site boundaries and not removed to another site.

C. Location of Waste Management Units

1. Submit as "Attachment C" a drawn-to-scale topographic map (or other map if a topographic map is unavailable) extending one mile beyond the facility boundaries, depicting the following:
 - a. The approximate boundaries of the facility (described in Section II.B) and within these boundaries, the location and boundaries of the areas occupied by each active, inactive, and proposed hazardous waste management unit (see Table III-2). Each depicted area should be labeled to identify the unit(s), unit status (i.e., active, inactive, or proposed), and areal size in acres.
 - b. The overall facility and all surface intake and discharge structures;
 - c. All on-site injection wells where liquids are injected underground;
 - d. All known monitor wells and boreholes within the property boundaries of the facility; and
 - e. All wells, springs, other surface water bodies, and drinking water wells listed in public records or otherwise known to the applicant within the map area and the purpose for which each water well is used (e.g., domestic, livestock, agricultural, industrial, etc.).
2. Submit as "Attachment D" photographs which clearly delineate all hazardous waste management storage, processing, and disposal units, as well as sites of future storage, processing and disposal units.

D. Flow Diagram/Description

Show as "Attachment E" process flow diagrams and step-by-step word descriptions of the process flow, depicting the handling, collection, storage, processing, and/or disposal of each of the hazardous wastes previously listed in this application.

The flow diagrams or descriptions should include the following information:

1. Originating point of each waste and waste classification code;
2. Means of conveyance utilized in every step of the process flow;
3. Name and function of each facility component through which the waste passes;
4. The ultimate disposition of all wastes (if off-site, specify "off-site") and waste residues.

IV. Index Of Attachments

List and index below all attachments to this application and indicate if included or not included:

Item	Attachments	Attachment	Included	Not Included
I.D.2.a	Lease/Option to buy	A		X
II.B	Site legal description	B	X	
III.C.1	Facility boundaries and adjacent waters map	C	X	
III.C.2	Photographs	D	X	
III.D	Process flow diagram/description	E		X



TCEQ Core Data Form

SECTION I: General Information

1. Reason for Submission (If other is checked please describe in space provided.)		
<input type="checkbox"/> New Permit, Registration or Authorization (Core Data Form should be submitted with the program application.)		
<input type="checkbox"/> Renewal (Core Data Form should be submitted with the renewal form)	<input checked="" type="checkbox"/> Other Class 3 Permit Modification	
2. Customer Reference Number (if issued)	Follow this link to search for CN or RN numbers in Central Registry**	3. Regulated Entity Reference Number (if issued)
CN 604166868		RN 104085691

SECTION II: Customer Information

4. General Customer Information		5. Effective Date for Customer Information Updates (mm/dd/yyyy)	
<input type="checkbox"/> New Customer		<input checked="" type="checkbox"/> Update to Customer Information	
<input type="checkbox"/> Change in Legal Name (Verifiable with the Texas Secretary of State or Texas Comptroller of Public Accounts)		<input type="checkbox"/> Change in Regulated Entity Ownership	
<i>The Customer Name submitted here may be updated automatically based on what is current and active with the Texas Secretary of State (SOS) or Texas Comptroller of Public Accounts (CPA).</i>			
6. Customer Legal Name (If an individual, print last name first: eg: Doe, John)		<i>If new Customer, enter previous Customer below:</i>	
Blanchard Refining Company LLC			
7. TX SOS/CPA Filing Number	8. TX State Tax ID (11 digits)	9. Federal Tax ID (9 digits)	10. DUNS Number (if applicable)
801666290	32049194742	371700623	
11. Type of Customer:	<input checked="" type="checkbox"/> Corporation	<input type="checkbox"/> Individual	Partnership: <input type="checkbox"/> General <input type="checkbox"/> Limited
Government: <input type="checkbox"/> City <input type="checkbox"/> County <input type="checkbox"/> Federal <input type="checkbox"/> Local <input type="checkbox"/> State <input type="checkbox"/> Other	<input type="checkbox"/> Sole Proprietorship	<input type="checkbox"/> Other:	
12. Number of Employees		13. Independently Owned and Operated?	
<input type="checkbox"/> 0-20 <input type="checkbox"/> 21-100 <input type="checkbox"/> 101-250 <input type="checkbox"/> 251-500 <input checked="" type="checkbox"/> 501 and higher		<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
14. Customer Role (Proposed or Actual) – as it relates to the Regulated Entity listed on this form. Please check one of the following			
<input type="checkbox"/> Owner <input type="checkbox"/> Operator <input checked="" type="checkbox"/> Owner & Operator <input type="checkbox"/> Other:			
<input type="checkbox"/> Occupational Licensee <input type="checkbox"/> Responsible Party <input type="checkbox"/> VCP/BSA Applicant			
15. Mailing Address:	539 South Main Street		
	City	Findlay	State OH ZIP 45840 ZIP + 4 3229
16. Country Mailing Information (if outside USA)		17. E-Mail Address (if applicable)	
18. Telephone Number	19. Extension or Code	20. Fax Number (if applicable)	
(419) 422-2121		() -	

SECTION III: Regulated Entity Information

21. General Regulated Entity Information (If "New Regulated Entity" is selected, a new permit application is also required.)							
<input type="checkbox"/> New Regulated Entity <input type="checkbox"/> Update to Regulated Entity Name <input checked="" type="checkbox"/> Update to Regulated Entity Information							
<i>The Regulated Entity Name submitted may be updated, in order to meet TCEQ Core Data Standards (removal of organizational endings such as Inc, LP, or LLC).</i>							
22. Regulated Entity Name (Enter name of the site where the regulated action is taking place.)							
Blanchard Refining Land Treatment Facility							
23. Street Address of the Regulated Entity: (No PO Boxes)	Physical location provided below						
	City	Texas City	State	TX	ZIP	77590	ZIP + 4
24. County	Galveston						

If no Street Address is provided, fields 25-28 are required.

25. Description to Physical Location:	Loop 197 S between State HWY 6 and FM 519						
26. Nearest City	State				Nearest ZIP Code		
Texas City	TX				77590		
<i>Latitude/Longitude are required and may be added/updated to meet TCEQ Core Data Standards. (Geocoding of the Physical Address may be used to supply coordinates where none have been provided or to gain accuracy).</i>							
27. Latitude (N) In Decimal:	29.343851			28. Longitude (W) In Decimal:	-94.928389		
Degrees	Minutes	Seconds	Degrees	Minutes	Seconds		
29	20	37.87	-94	55	42.19		
29. Primary SIC Code (4 digits)	30. Secondary SIC Code (4 digits)		31. Primary NAICS Code (5 or 6 digits)		32. Secondary NAICS Code (5 or 6 digits)		
2911			32411				
33. What is the Primary Business of this entity? (Do not repeat the SIC or NAICS description.)							
Petroleum Refinery (Land Treatment Facility)							
34. Mailing Address:	PO Box 401						
	City	Texas City	State	TX	ZIP	77592	ZIP + 4
35. E-Mail Address:							
36. Telephone Number	37. Extension or Code			38. Fax Number (if applicable)			
(409)-943-7022 (Jan Werner)				() -			

39. TCEQ Programs and ID Numbers Check all Programs and write in the permits/registration numbers that will be affected by the updates submitted on this form. See the Core Data Form instructions for additional guidance.

<input type="checkbox"/> Dam Safety	<input type="checkbox"/> Districts	<input type="checkbox"/> Edwards Aquifer	<input type="checkbox"/> Emissions Inventory Air	<input checked="" type="checkbox"/> Industrial Hazardous Waste
				50183
<input type="checkbox"/> Municipal Solid Waste	<input type="checkbox"/> New Source	<input type="checkbox"/> OSSF	<input type="checkbox"/> Petroleum Storage Tank	<input type="checkbox"/> PWS
<input type="checkbox"/> Sludge	<input checked="" type="checkbox"/> Storm Water	<input type="checkbox"/> Title V Air	<input type="checkbox"/> Tires	<input type="checkbox"/> Used Oil
	WQ0000443000			
<input type="checkbox"/> Voluntary Cleanup	<input type="checkbox"/> Wastewater	<input type="checkbox"/> Wastewater Agriculture	<input type="checkbox"/> Water Rights	<input checked="" type="checkbox"/> Other: Solid Waste
				34507

SECTION IV: Preparer Information

40. Name:	Todd Palmer	41. Title:	Env Supervisor, Waste and Water
42. Telephone Number	43. Ext./Code	44. Fax Number	45. E-Mail Address
(409) 943-7248		(409) 941-8292	[REDACTED]

SECTION V: Authorized Signature

46. By my signature below, I certify, to the best of my knowledge, that the information provided in this form is true and complete, and that I have signature authority to submit this form on behalf of the entity specified in Section II, Field 6 and/or as required for the updates to the ID numbers identified in field 39.

Company:	Blanchard Refining Company LLC	Job Title:	Vice President Refining
Name (In Print):	Travis Beltz	Phone:	(409)-945-1141
Signature:		Date:	12/15/25

Signature Page

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Operator Signature: [Signature] Date: 1/27/26

Name and Official Title (type or print): Travis Beltz, Vice President Refining

Operator Signature: _____ Date: _____

Name and Official Title (type or print): _____

Operator Signature: _____ Date: _____

Name and Official Title (type or print): _____

Owner Signature: _____ Date: _____

Name and Official Title (type or print): _____

To be completed by the operator if the application is signed by an authorized representative for the operator

I, _____ hereby designate _____
(operator) (authorized representative)

as my representative and hereby authorize said representative to sign any application, submit additional information as may be requested by the Commission; and/or appear for me at any hearing or before the Texas Commission on Environmental Quality in conjunction with this request for a Texas Water Code or Texas Solid Waste Disposal Act permit. I further understand that I am responsible for the contents of this application, for oral statements given by my authorized representative support of the application, and for compliance with the terms and conditions of any permit which might be issued based upon this application.

Printed or Typed Name of Operator or Principal Executive Officer

Signature

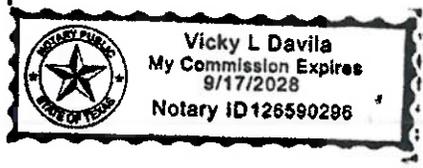
(Note: Application Must Bear Signature & Seal of Notary Public)

Subscribed and sworn to before me by the said Travis Beltz on this

27 day of January, 2026.

My commission expires of the 17 day of September, 2028

Vicky S. Davila
Notary Public in and for Galveston County, Texas



Signature Page

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Operator Signature: [Signature] Date: 12/15/25

Name and Official Title (type or print): Travis Beltz, Vice President Refining

Operator Signature: _____ Date: _____

Name and Official Title (type or print): _____

Operator Signature: _____ Date: _____

Name and Official Title (type or print): _____

Owner Signature: _____ Date: _____

Name and Official Title (type or print): _____

To be completed by the operator if the application is signed by an authorized representative for the operator

I, _____ hereby designate _____
(operator) (authorized representative)

as my representative and hereby authorize said representative to sign any application, submit additional information as may be requested by the Commission; and/or appear for me at any hearing or before the Texas Commission on Environmental Quality in conjunction with this request for a Texas Water Code or Texas Solid Waste Disposal Act permit. I further understand that I am responsible for the contents of this application, for oral statements given by my authorized representative support of the application, and for compliance with the terms and conditions of any permit which might be issued based upon this application.

Printed or Typed Name of Operator or Principal Executive Officer

Signature

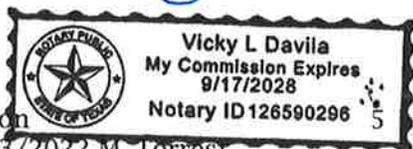
(Note: Application Must Bear Signature & Seal of Notary Public)

Subscribed and sworn to before me by the said Travis Beltz on this

15 day of December, 2025.

My commission expires of the 17 day of September, 2028

Vicky L. Davila
Notary Public in and for Galveston County, Texas



**Table III-1 – Hazardous Wastes and Management Activities
(Waste Streams Historically Treated at the LTF)**

Verbal Description of Waste	TCEQ Waste for Code and Classification Code	EPA Hazardous Waste Number	Storage ¹ of Wastes Received from Off-Site	Processing ² of Wastes Received from Off-Site	Disposal of Wastes Received from Off-Site	Storage ¹ of Wastes Generated On-Site	Processing ² of Wastes Generated On-Site	Disposal of Wastes Generated On-Site	Annual Quantity Generated and/or Received
Blanchard no longer applies hazardous waste to the landfarm; only non-hazardous biosolids are currently applied. See Table IV B for the list of non-hazardous wastes currently applied to the landfarm.									
HISTORICAL HAZARDOUS									
Oil and Water Sludge	9014603H	D001, D018, K049, K051					X		**
Cooling Tower Sludge	9040519H	D007					X		**
Sulfolene Reclaimer Sludge	9028605H	D001, D018					X		**
Slop Oil Emulsion Solids	9023603H	D001, D018, K049					X		**
Soils, Organic Contaminated	9026301H	see note 3					X		**
Heat Exchanger Bundle Cleaning Sludge	9009603H	D018, K050					X		**
Acid Sludge, Hydrocarbon Containing	9001519H	D002					X		**
Lab Waste	9010003H	see note 3					X		**
Catalyst, Chromium	9005393H	D007					X		**
Soil, Benzene Contaminated	9024301H	see note 3					X		**

¹ "Storage" means the holding of solid waste for a temporary period, at the end of which the waste is processed, disposed of, or stored elsewhere.

² "Processing" means the extraction of materials, transfer, volume reduction, conversion to energy, or other separation and preparation of solid waste for reuse or disposal, including the treatment or neutralization of hazardous waste, designed to change the physical, chemical, or biological character or composition of any hazardous waste so as to neutralize such waste, or so as to recover energy or material from the waste or so as to render such waste non-hazardous or less hazardous; safer for transport, store or dispose of; or amenable for recovery, amenable for storage, or reduced in volume. The "transfer" of solid waste for reuse or disposal as used above, does not include the actions of a transporter in conveying or transporting solid waste by truck, ship, pipeline, or other means. Unless the Executive Director determines that regulation of such activity is necessary to protect human health or the environment, the definition of "processing" does not include activities relating to those materials exempted by the Resource Conservation and Recovery Act, 42 U.S.C. 6901 et seq., as amended.

Note 3

EPA Hazardous Waste Codes: (Soil, Organic Contaminated) F001, F002, F003, F005, U002, U019, U159, U160, U161, U211, U220, U239.

EPA Hazardous Waste Codes: (Lab Waste) D009, D012, D018, D019, D023, D024, P048, P098, P105, U025, U032, U045, U069, U117, U134, U144, U151, U188, U196, U220, U223.

EPA Hazardous Waste Codes: (Soils, Benzene Contaminated) D018, D019, D040, K048, K049, K050, K051.

Verbal Description of Waste	TCEQ Waste for Code and Classification Code	EPA Hazardous Waste Number	Storage ¹ of Wastes Received from Off-Site	Processing ² of Wastes Received from Off-Site	Disposal of Wastes Received from Off-Site	Storage ¹ of Wastes Generated On-Site	Processing ² of Wastes Generated On-Site	Disposal of Wastes Generated On-Site	Annual Quantity Generated and/or Received
Filter Clay, Hydrocarbon Containing	9042310H	D018					X		**
Spent Catalyst Desulfurization	9004393H	D003					X		**
Soils, Benzene-Lead Chromium Contaminated	9025301H	D007, D008, D018					X		**
Sludges, Process Turnaround	9019603H	D018, F037, F038					X		**
DAF Float	9007603H	D018, K048					X		**
Filter Cake Media	9008403H	D018, F037, F038, K048, K049, K050, K051					X		**
Screen Trash	9021319H	D018, F037, F038, K048, K049, K050, K051					X		**
Storm Basin Sludges	948320	D018					X		**
API Separator Sludge (NOR No. 32297)	0014695H	D001					X		**
Primary Sludge	9018603H	F037					X		**
Secondary Sludge	9022603H	F038					X		**
Oil and Water Sludge (NOR No 30373)	949820	D018					X		**
Spill Cleanup (NOR No. 32016)	9001310H	D001, D018					X		**
Spill Cleanup (NOR No. 30799)	9001310H	D001, D018					X		**
Spill Cleanup (NOR No. 33624)	9001310H	D001, D018					X		**
Tank Bottoms, BP Docks (NOR No.	9030602H	D001, D018					X		**

Verbal Description of Waste	TCEQ Waste for Code and Classification Code	EPA Hazardous Waste Number	Storage ¹ of Wastes Received from Off-Site	Processing ² of Wastes Received from Off-Site	Disposal of Wastes Received from Off-Site	Storage ¹ of Wastes Generated On-Site	Processing ² of Wastes Generated On-Site	Disposal of Wastes Generated On-Site	Annual Quantity Generated and/or Received
30799)									
Tank Bottoms, Oily	9031603H	D001, D018					X		**
Tank Scale	9033307H	D018					X		**
Soils Containing Sulfuric Acid	9006110H	D002					X		**
Amine Reclaimer Bottoms	9202602H	D007, D010					X		***
HISTORICAL NONHAZARDOUS									
Water Treatment Sludge	20285192						X		**
Lime Treater Sludge	10275011						X		**
Oily Tank Bottoms	10316021						X		**
Soil, Petroleum Contaminated	10228011						X		**
Soil, Other Contaminated	20273022						X		**
Filter Clay, Hydrocarbon Containing	20143102						X		**
Cooling Tower Sludge	20125192						X		**
Oily Anthracite Coal	20046062						X		**
Oil and Water Sludge	10166031						X		**
Sludge, Cooling Tower	10125191						X		**
Catalyst, Spent-Acid	10113931						X		**
Catalyst, Spent	10073931						X		**
Spent Activated Carbon	10044041						X		**
Oil, Waste	110450						X		**
Spent Activated	20014041						X		**

Verbal Description of Waste	TCEQ Waste for Code and Classification Code	EPA Hazardous Waste Number	Storage ¹ of Wastes Received from Off-Site	Processing ² of Wastes Received from Off-Site	Disposal of Wastes Received from Off-Site	Storage ¹ of Wastes Generated On-Site	Processing ² of Wastes Generated On-Site	Disposal of Wastes Generated On-Site	Annual Quantity Generated and/or Received
Carbon									
Sludge, Clarifier	20175042						X		**
Sludge, EQ Basin	241770						X		**
Waste Activated Sludge, Digested (Biosludge)	20056072						X		**
Sludge, Filter Backwash	250640						X		**
Screen Trash	250640						X		**
Screen Trash	170177						X		**
Spill Cleanup (NOR No. 32016)	10013101						X		**
Spill Cleanup (NOR No. 32016)	278510						X		**
Spill Cleanup (NOR No. 30799)	10013101						X		**
Spill Cleanup (NOR No. 30799)	278510						X		**
Spill Cleanup (NOR No. 33624)	10013101						X		**
Spill Cleanup (NOR No. 33624)	278510						X		**
Grit Chamber Sludge (NOR No. 34507)	20023012						X		**
Contaminated Soil (NOR No. 34507)	20023013						X		**
Separator Sludge (NOR No. 32297)	20073192						X		**
Stormwater Basin Sludge (NOR No. 32297)	20063192						X		**
Lime Treater Sludge (NOR No. 30373)	20025012						X		**
Separator Sludge (NOR No. 30373)	10056091						X		**

Verbal Description of Waste	TCEQ Waste for Code and Classification Code	EPA Hazardous Waste Number	Storage ¹ of Wastes Received from Off-Site	Processing ² of Wastes Received from Off-Site	Disposal of Wastes Received from Off-Site	Storage ¹ of Wastes Generated On-Site	Processing ² of Wastes Generated On-Site	Disposal of Wastes Generated On-Site	Annual Quantity Generated and/or Received
Soil, Contaminated (NOR No. 30373)	280490						X		**
Contaminated Soil (NOR No. 39651)	10033011						X		**
Contaminated Soil (NOR No. 8433)	10033011						X		**
Wastewater Treatment Sludge Filtercake (NOR No, 30042)	00283911						X		**
Wastewater Treatment Sludge Filtercake (NOR No. 30042)	00343912						X		**
Sand Filter Beds (NOR No. 30042)	00243191						X		**
Sand Filter Beds (NOR No. 30042)	0033192						X		**
Coke Fines (NOR No. 30042)	00214092						X		**
Oil Contaminated Soils (NOR No. 30042)	00064891						X		**
Soils Contaminated with H ₂ SO ₄	970490						X		**

Table III-2 – Hazardous Waste Management Unit Checklist

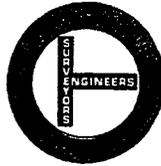
Waste Management Unit	TCEQ N.O.R. Unit #	Status¹	Design Capacity²	Number of Years Utilized	Date in Service
CAMU I Cells D3 and D4	008	Closed (2020)	NA, closed	43/23	1977/1997 (LTU/CAMU)
LTU Cell B5	033	Closed (2020)	NA, closed	47	1973
LTU Cell B6	034	Closed (2020)	NA, closed	47	1973
LTU Cell B7	035	Closed (1989)	NA, closed	16	1973
LTU Cell D1	003	Closed (2020)	NA, closed	43	1977
LTU Cell D2	036	Closed (2020)	NA, closed	43	1977
LTU Cell D7	037	Closed (2020)	NA, closed	43	1977
LTU Cell D8	038	Closed (2020)	NA, closed	43	1977
LTU Cell D9	039	Closed (1993)	NA, closed	16	1977
LTU Cell A1	001	Active (Delay of Closure)	35,000 dry tons annually (A Cells)	50	1973
LTU Cell A2	016	Active (Delay of Closure)	35,000 dry tons annually (A Cells)	50	1973
LTU Cell A3	017	Active (Delay of Closure)	35,000 dry tons annually (A Cells)	50	1973
LTU Cell A4	018	Active (Delay of Closure)	35,000 dry tons annually (A Cells)	50	1973
LTU Cell A5	019	Active (Delay of Closure)	35,000 dry tons annually (A Cells)	50	1973
LTU Cell A6	020	Active (Delay of Closure)	35,000 dry tons annually (A Cells)	50	1973
LTU Cell A7	021	Active (Delay of Closure)	35,000 dry tons annually (A Cells)	50	1973
LTU Cell A8	022	Active (Delay of Closure)	35,000 dry tons annually (A Cells)	50	1973
LTU Cell A9	023	Active (Delay of Closure)	35,000 dry tons annually (A Cells)	50	1973
LTU Cell A10	024	Active (Delay of Closure)	35,000 dry tons annually (A Cells)	50	1973

¹ Indicate only one of the following: Active, Inactive, Closed, or Proposed

² Cubic yards, gallons, pounds, gallons/minute, pounds/hour, BTUs/hour, etc.

Waste Management Unit	TCEQ N.O.R. Unit #	Status ¹	Design Capacity ²	Number of Years Utilized	Date in Service
LTU Cell A11	025	Active (Delay of Closure)	35,000 dry tons annually (A Cells)	50	1973
CAMU II Cell B2	026	Closed (2025)	NA, closed	47	1973
CAMU II Cell B3	027	Closed (2025)	NA, closed	47	1973
CAMU II Cell B4	028	Closed (2025)	NA, closed	47	1973
CAMU II Cell C1	029	Closed (2025)	NA, closed	47	1973
CAMU II Cell C2	030	Closed (2025)	NA, closed	47	1973
CAMU II Cell C3	031	Closed (2025)	NA, closed	47	1973
CAMU II Cell D5	032	Closed (2025)	NA, closed	43	1977
LTU Cell C4	015	Closed (1989)	NA, closed	16	1973
LTU Cell B1 (Staging Pile)	013	Closed (2025)	NA, closed	47	1973
LTU Cell D6 (Staging Pile)	014	Closed (2025)	NA, closed	43	1977

JAY GARRETT ENGINEER



Branch Office: 3610 17th ST. NORTH
TEXAS CITY, TEXAS 77590
(409) 945-3173
FAX (409) 945-8177

FIELDNOTES of a tract of land in the H. B. Littlefield Survey and the S. C. Brundick League in Galveston County, Texas, and being out of and a part of that certain 336.39 acre Tract described in a deed to American Oil Company of record in Book 1987 Page 56 of the Deed records of Galveston County, Texas, and this tract being more particularly described as follows:

BEGINNING at a found 5/8" re-bar for the most southerly southeast corner of this, said point being the intersection of the west margin of Loop 197 and the south line of aforementioned 336.39 acre Tract and the north line of a 120 acre Tract described in a deed to Texas City Terminal Railway Company of record in Vol. 1199 Page 511 of the Deed Records of Galveston County, Texas; said point having Texas State Plane coordinates of Northing 570,794.15 and Easting 3,295,612.83;

THENCE N 41 06' 52" W a distance of 3579.73 feet with the common line between aforementioned 336.39 acre Tract and the 120 acre Tract as evidenced by an existing fence to a fence post for the southwest corner of this;

THENCE with an existing fence N 50 23' 47" E 2768.19 feet to a fence post, N 41 27' 09" W 26.66 feet to a fence post, and N 49 43' 41" E 89.57 feet to a 5/8" x 24" re-bar set for the northwest corner of this;

THENCE S 71 12' 22" E a distance of 1621.12 feet to a 5/8" x 24" re-bar set in the west margin of Loop 197 for the northeast corner of this;

THENCE S 18 45' 29" W with the west margin of Loop 197 a distance of 4242.56 feet to the place of beginning, containing 195.47 acres of land.

Bearings are based on the Texas State Plane coordinate system.

These fieldnotes were prepared from records in the Galveston County Clerk's Office and from an actual survey on the ground under my supervision.

MARCH 21, 1997



W. J. Garrett, Jr.
W. J. Garrett, Jr.
RPLS # 2774

JAY GARRETT ENGINEER



Branch Office: 3610 17th ST. NORTH
TEXAS CITY, TEXAS 77590
(409) 945-3173

FIELDNOTES of a tract of land (Cell D-3) out of the Samuel C. Bundick League, Abstract No. 7, in Galveston County, Texas, and being out of and a part of that certain 336.39 acre Tract described in a deed to American Oil Company dated October 08, 1968, and filed for record in Book 1987 Page 56 of the Deed records of Galveston County, Texas, and being more particularly described as follows:

COMMENCING at the most southerly corner of aforementioned 336.39 acre Tract a found 5/8" iron pin in the west margin of Loop 197, THENCE N 0 38' 53" E a distance of 3,448.57 feet to the point of beginning, a 5/8" x 24" re-bar set for the southwest corner of Cell D-3. Said point having Texas State Plane Coordinates of Northing 574,242.50, Easting 3,295,651.83;

THENCE N 0 44' 47" W a distance of 478.42 feet to a 5/8" X 24" re-bar set for the northwest corner of this;

THENCE N 88 18' 24" E a distance of 378.02 feet to a 5/8" x 24" re-bar set for the northeast corner of this;

THENCE S 01 21' 18" E a distance of 468.53 feet to a 5/8" X 24" re-bar set for the southeast corner of this;

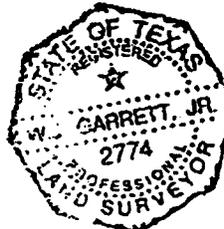
THENCE S 86 50' 14" W a distance of 383.29 feet to the place of beginning, containing 4.136 acres of land.

These fieldnotes were prepared from records in the Galveston County Clerk's Office and from an actual survey on the ground under my direct supervision.

Bearings are based on the Texas State Plane Coordinate System.

NOVEMBER 09, 1996


W. J. Garrett, Jr.
RPLS # 2774



JAY GARRETT ENGINEER



Branch Office: 3610 17th ST. NORTH
TEXAS CITY, TEXAS 77590
(409) 945-3173

FIELDNOTES of a tract of land (Cell D-4) out of the Samuel C. Bundick League, Abstract No. 7, in Galveston County, Texas, and being out of and a part of that certain 336.39 acre Tract described in a deed the American Oil Company dated October 08, 1968, and filed for record in Book 1987 Page 56 of the Deed Records of Galveston County, Texas, and being more particularly described as follows:

COMMENCING at the most southerly corner of aforementioned 336.39 acre Tract a found 5/8" iron pin in the west margin of Loop 197, THENCE N 04 24' 30" W a distance of 3,443.59 feet to the point of beginning, a 5/8" x 24" re-bar set for the southwest corner of Cell D-4. Said point having Texas State Plane Coordinates of Northing 574,222.41, Easting 3,295,288.26;

THENCE N 03 56' 10" W a distance of 488.06 feet to a 5/8" x 24" re-bar set for the northwest corner of this;

THENCE N 88 18' 24" E a distance of 370.95 feet to a 5/8" x 24" re-bar set for the northeast corner of this;

THENCE S 0 44' 27" E a distance of 478.93 feet to a 5/8" x 24" re-bar set for the southeast corner of this;

THENCE S 86 50' 14" W a distance of 344 feet to the place of beginning, containing 3.966 acres of land.

These fieldnotes were prepared from records in the Galveston County Clerk's Office and from an actual survey on the ground under my direct supervision.

Bearings are based on the Texas State Plane Coordinate System.

NOVEMBER 09, 1996


W. J. Garrett, Jr.
RPLS # 2774



VOLUME 1
- ATTACHMENT F
DEED RECORDATION

AMOCO TEXAS REFINING COMPANY

TEXAS CITY, TEXAS

WASTE DISPOSAL SITES

D E E D

BOOK 2911 PAGE 392

Landfarm No. 1

1. Description of a 148.11295 acre tract of land out of the Samuel C. Bundick League and H. B. Littlefield Survey, Galveston County, Texas.

Commencing at the most southerly corner of a 336.39 acre tract conveyed to American Oil Company by the Board of Regents of the University of Texas System by deed dated October 8, 1968, and recorded in Volume 1987, Page 56 in the Office of the County Clerk of Galveston County, Texas, said point being located at the intersection of the original Northwesterly right of way line of State Highway Loop 197 with the Easterly line of the Texas City Terminal Railway Company 120 acre tract;

THENCE N39°12'33"W, along the common line of the Texas City Terminal Railway Company 120 acre tract and the American Oil Company 336.39 acre tract, a distance of 28.90 feet to the place of beginning of the tract hereinafter described (S-14, 222.31, W1, 349.38), said beginning corner being the point of intersection of the widened Northwesterly right of way line of State Highway Loop 197 with the common line of the Texas City Terminal Railway Company 120 acre tract and the American Oil Company 336.39 acre tract;

THENCE from said beginning corner continuing N39°12'33"W, along the common line between the Texas City Terminal Railway Company 120 acre tract and the American Oil Company 336.39 acre tract, a distance of 3599.51 feet to a point for corner (S-11, 433.26, W-3624.82) in the Southeasterly line of the Texas City Hurricane Protection Levee right of way;

THENCE N51°50'E, along the Southeasterly line of the Texas City Hurricane Protection Levee right of way, a distance of 955.74 feet to a point for corner (S-10, 842.65, W-2, 873.40);

THENCE N89°59'44"E, a distance of 2800.18 feet to a point for corner (S-10, 842.43, W-73.23) in a widened Northwesterly right of way line of State Highway Loop 197;

THENCE S20°41'07"W, along the widened Northwesterly right of way line of State Highway, Loop 197, a distance of 3612.77 feet to the place of beginning (S-14, 222.31, W-1, 349.38) and containing (6,451,800S.F.) 148.11295 acres, more or less. (Bearings based on Amoco Texas Refining Company, Texas City, Texas Refining master grid bearings).

2. Texas Water Quality Board class or classes of wastes disposed or proposed for disposal:

Class I, II and III

3. The name and permanent address of company where more specific information on the waste can be obtained:

AMOCO TEXAS REFINING COMPANY
2401 5th AVENUE SOUTH
TEXAS CITY, TEXAS 77590

Landfarm No. 2

1. Description of a 67.10915 acre tract of land out of the H. B. Littlefield Survey, Galveston County, Texas

Commencing at the most southerly corner of a 336.39 acre tract conveyed to American Oil Company by the Board of Regents of the University of Texas System by deed dated October 8, 1968, and recorded in Volume 1987, page 56 in the Office of the County Clerk of Galveston County, Texas, said point being located at the intersection of the original Northwesterly right of way line of State Highway Loop 197 with the Easterly line of the Texas City Terminal Railway Company 120 acre tract;

THENCE N39°12'33"W, along the common line of the Texas City Terminal Railway Company 120 acre tract and the American Oil Company 336.39 acre tract, a distance of 28.90 feet to the point of intersection of the widened Northwesterly right of way line of State Highway Loop 197 with the Easterly line of the Texas City Terminal Railway Company 120 acre tract (S-14, 222.31, W-1, 349.38);

THENCE N20°41'07"E, along the widened Northwesterly right of way line of State Highway Loop 197, a distance of 3612.77 feet to the place of beginning of the tract hereinafter described (S-10, 842.43, W-73.23);

THENCE S89°59'44"W, a distance of 2800.18 feet to a point for corner (S-10, 842.65, W2, 873.40) in the Southeasterly line of the Texas City Hurricane Protection Levee right of way;

THENCE, along the Southeasterly line of the Texas City Hurricane Protection Levee right of way, N51°50'E, a distance of 1355.24 feet to an angle point (S-10, 005.18, W-1807.89) in said right of way;

THENCE, continuing along the Southeasterly line of the Texas City Hurricane Protection Levee right of way, N54°07'26"E, a distance of 500.40 feet to an angle point (S-9, 711.93, W-1, 402.42) in said right of way;

THENCE, continuing along the Southeasterly line of the Texas City Hurricane Protection Levee right of way, N51°50'E, a distance of 669.78 feet to a point for corner (S-9, 298.01, W-875.83);

THENCE S69°24'01"E, a distance of 1296.41 feet to a point for corner (S-9, 754.16, E-337.68) in the widened Northwesterly right of way line of State Highway Loop 197;

Page Three

THENCE S20°41'07"W, along the widened Northwesterly right of way line of State Highway Loop 197, a distance of 1163.27 feet to the place of beginning (S-10, 842.43, W-71.23) and containing (2,923,274S.F.) 67.10915 acres, more or less. (Bearings based on Amoco Texas Refining Company, Texas City, Texas Refining master grid bearings).

2. Texas Water Quality Board class or classes of wastes disposed or proposed for disposal:

Class I, II and III

3. The name and permanent address of company where more specific information on the waste can be obtained:

AMOCO TEXAS REFINING COMPANY
2401 5th AVENUE SOUTH
TEXAS CITY, TEXAS 77590

Deed Notice

STATE OF TEXAS

COUNTY OF GALVESTON

This Notice is filed to provide information concerning certain environmental conditions and/or use limitations pursuant to the Texas Commission on Environmental Quality (TCEQ) Regulations found at 30 TAC 335.5, and affects the real property (Property) described as follows:

Subject Property: Blanchard Refining Company LLC operates a Land Treatment Facility in Texas City, Texas consisting of plots of land (called cells) on approximately 196 acres in Galveston County described as follows: Loop 197 South, Texas City, Texas borders the Land Treatment Facility on the east. The Texas City Hurricane Protection Levee borders the Land Treatment Facility on the northwest. HWY 45 intersects Loop 197 1.2 miles south of the Land Treatment Facility gate. The subject property legal description has been submitted as part of the facility's TCEQ permit application (RCRA permit 50183).

Construction Area Cells: Ten of the land treatment cells on the Subject Property (Construction Area Cells, approximately 53 acres) have been closed to support construction of a crude oil tank terminal. Disposal of industrial solid waste or municipal hazardous waste occurred on these cells. Exhibit A includes a metes and bounds description and a plat map of the Construction Area Cells.

This Notice is required for the following reasons:

The portion of the facility described in the attached Exhibit A (Construction Area Cells) has been closed in compliance with applicable TCEQ regulations and the approved Closure Plan for the Land Treatment Facility regulated under TCEQ RCRA Permit 50183, and resulted in elimination or reduction to the maximum degree practicable of substantial present and future risks. The closure includes placement of a compacted clay cover over the treatment cells in which disposal of hazardous wastes occurred. The clay cover is a permanent physical control that will not be disturbed and will be inspected and maintained as discussed below. The wastes contained within the closed cells may include those listed in the table below.

<i>Waste Description</i>	<i>EPA Waste Codes</i>
<p><u><i>Hazardous Waste</i></u></p> <p><i>Refinery oily sludges, hydrocarbon impacted soils, and various refinery wastes (API separator, cooling tower, sulfolene reclaimer, slop oil solids, heat exchanger bundle, catalysts, lab waste, filter clay, DAF unit float, filter cake, oily water sewer sludge, spill cleanup soils, tank bottoms, etc.)</i></p>	<p><i>D001, D002, D003, D007, D008, D018, D010, K048, K049, K050, K051, F037, F038 (constituents in these wastes include volatile and semi-volatile organic compounds and metals)</i></p>
<p><u><i>Non-Hazardous Waste</i></u></p> <p><i>Water treatment sludge, hydrocarbon impacted soils, lime treater sludge, oily tank bottoms, filter clay, cooling tower sludge, spent catalyst, spent activated carbon, dewatered biological wastewater treatment sludge, lime sludge, still bottoms, resins, separator sludge, waste activated sludge, clarifier sludge, spill cleanup soils, grit chamber solids, sand filter bed, petroleum coke fines, etc.</i></p>	<p><i>Not applicable to non-hazardous wastes (constituents in these wastes include volatile and semi-volatile organic compounds and metals)</i></p>

Post-closure care of the clay cover system placed over the Construction Area Cells consists of inspection and maintenance for 30 years and semi-annual groundwater monitoring in accordance with the facility's RCRA permit (50183).

For additional information, contact:

TCEQ
 Central Records
 12100 Park 35 Circle, Building E
 Austin, Texas 78753
 Phone: 512-239-2900

Mail: TCEQ - MC 213
 P O Box 13087
 Austin, Texas 78711-3087

BLANCHARD REFINING COMPANY LLC

Todd Palmer
 Environmental Supervisor, Waste and Water
 P. O. Box 401
 2401 5th Avenue South
 Texas City, TX 77592
 (409) 943-7248

TCEQ Program and Identifier No.: RCRA Permit 50183

Executed this 25th day of February, 2020.

Blanchard Refining Company LLC

By: Ray Brooks

Name: Ray Brooks

Title: President Blanchard Refining

Company LLC



STATE OF OHIO }
COUNTY OF HANCOCK } SS

BEFORE ME, on this the day personally appeared Ray Brooks, President of Blanchard Refining Company LLC, known to me to be the person whose name is subscribed to the foregoing instrument, and he acknowledged to me that he executed the same for the purposes and consideration therein expressed.

GIVEN UNDER MY HAND AND SEAL OF OFFICE, this the 25th day of February, 2020.



JOYCE A DRAKE
Notary Public
In and for the State of Ohio
My Commission Expires
April 15, 2023

Notary Public in and for the State of Ohio

County of Hancock

Joyce A Drake

My Commission Expires:

4-15-23

Exhibit A

Construction Area Cells Description and Plat Map

January 03, 2020

EXHIBIT "A":

Metes and Bounds Description
53.21 Acre Interim Closure Area

BEING a 53.21 acre artifact (or tract) lying in the SAMUEL C BUNDICK SURVEY, Abstract No. 7, and the H.B. LITTLEFIELD SURVEY, Abstract No. 143, both in Galveston County, Texas, and out of the remainder of a called 344.902 acre tract of land described in an instrument to Blanchard Refining Co. LLC, of record in Clerk's File No. 2013006787 of the Official Public Records of Galveston County, Texas, said 53.21 acres being more particularly described as follows:

Note: All bearings, coordinates, areas and distances are based on the Texas Coordinate System of 1983 (NAD83), South Central Zone, with a scale factor of 0.99986325 and a convergence angle at the POINT OF COMMENCEMENT of 01°59'39".

COMMENCING at a pinched-top pipe found in the west right-of-way line of Loop 197 South for the most southerly corner of said 344.902 acre tract, having a state plane coordinate value of N: 13694165.06, E: 3265020.05, from which a concrete monument (TxDOT) was found in the east line of said 344.902 acre tract marking the west right-of-way line of Loop 197 South at North 18°45'26" East, 6, '31.49 feet;

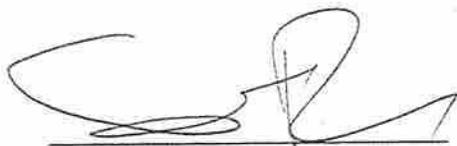
THENCE North 15°44'14" East, across said 344.902 acre tract, a distance of 2,548.39 feet to the southeast corner and BEGINNING POINT for the herein described tract, having a state plane coordinate value of N: 13696617.92, E: 3265711.23;

THENCE the following twenty-five (25) courses and distances along the perimeter of the herein described tract:

- | | |
|---------------------------|---------------------------|
| 1. N 89°39'27" W 838.79' | 14. N 54°17'53" E 90.59' |
| 2. N 11°40'33" W 206.46' | 15. N 55°37'17" E 188.62' |
| 3. N 81°53'19" E 24.84' | 16. S 74°37'55" E 83.83' |
| 4. N 02°07'25" W 776.05' | 17. S 71°54'51" E 296.33' |
| 5. S 88°21'06" W 138.98' | 18. S 70°20'50" E 955.84' |
| 6. N 02°21'41" W 360.18' | 19. S 24°46'49" E 84.60' |
| 7. N 00°05'01" W 144.90' | 20. S 12°01'44" E 70.46' |
| 8. S 89°44'07" W 418.39' | 21. S 17°06'25" W 428.00' |
| 9. N 58°20'24" W 20.60' | 22. S 19°33'43" W 532.32' |
| 10. N 10°59'24" E 21.87' | 23. S 18°24'54" W 474.33' |
| 11. N 51°02'32" E 247.12' | 24. S 58°40'45" E 41.01' |
| 12. N 51°41'09" E 130.04' | 25. S 20°40'34" W 14.17' |
| 13. N 52°15'02" E 144.65' | |

THENCE South 66°22'06" West, a distance of 61.41 feet to the POINT AND PLACE OF BEGINNING, containing 53.21 acres (2,317,818 sq. ft.), more or less.

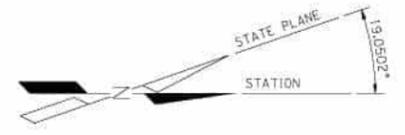
This description is based on the limits of a topographic survey performed by Access Surveyors in 2017 (project no. 18481) tied to the property boundary in December of 2019 (project no. 2019822).



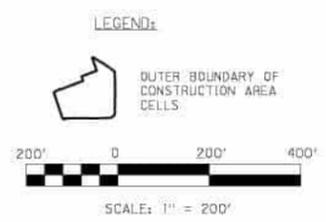
Scott N. Brackin
R.P.L.S. No. 6650



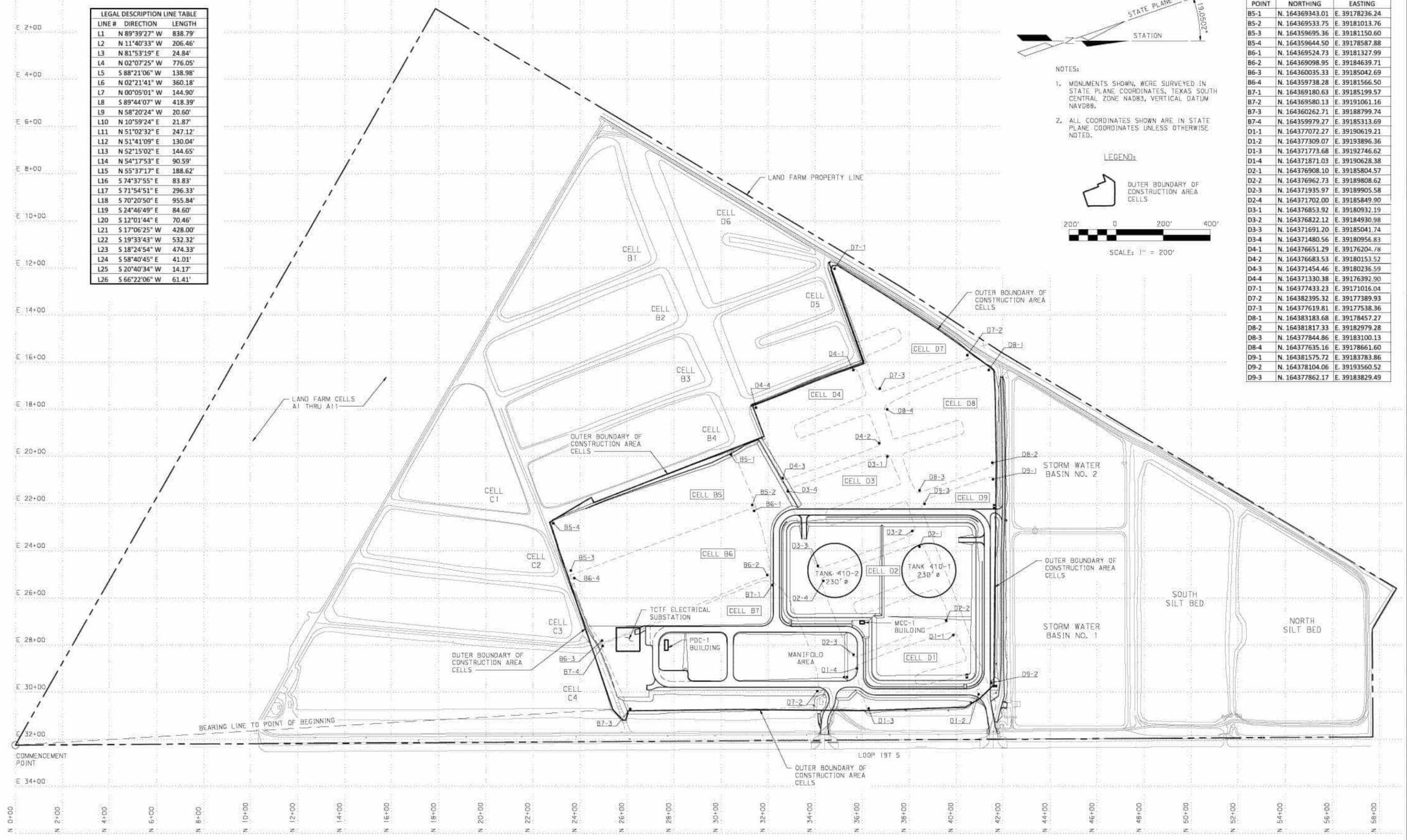
LINE #	DIRECTION	LENGTH
L1	N 89°39'27" W	838.79'
L2	N 11°40'33" W	206.46'
L3	N 81°53'19" E	24.84'
L4	N 02°07'25" W	776.05'
L5	S 88°21'06" W	138.98'
L6	N 02°21'41" W	360.18'
L7	N 00°05'01" W	144.90'
L8	S 89°44'07" W	418.39'
L9	N 58°40'24" W	20.60'
L10	N 10°59'24" E	21.87'
L11	N 51°02'32" E	247.12'
L12	N 51°41'09" E	130.04'
L13	N 52°15'02" E	144.65'
L14	N 54°17'53" E	90.59'
L15	N 55°37'17" E	188.62'
L16	S 74°37'55" E	83.83'
L17	S 71°54'51" E	296.33'
L18	S 70°20'50" E	955.84'
L19	S 24°46'49" E	84.60'
L20	S 12°01'44" E	70.46'
L21	S 17°06'25" W	428.00'
L22	S 19°33'43" W	532.32'
L23	S 18°24'54" W	474.33'
L24	S 58°40'45" E	41.01'
L25	S 20°40'34" W	14.17'
L26	S 66°22'06" W	61.41'



- NOTES:
- MONUMENTS SHOWN, WERE SURVEYED IN STATE PLANE COORDINATES, TEXAS SOUTH CENTRAL ZONE NAD83, VERTICAL DATUM NAVD88.
 - ALL COORDINATES SHOWN ARE IN STATE PLANE COORDINATES UNLESS OTHERWISE NOTED.



POINT	NORTHING	EASTING
B5-1	N. 164369343.01	E. 39178236.24
B5-2	N. 164369533.75	E. 39181013.76
B5-3	N. 164359695.36	E. 39181150.60
B5-4	N. 164359644.50	E. 39178587.88
B6-1	N. 164369524.73	E. 39181327.99
B6-2	N. 164369098.95	E. 39184639.71
B6-3	N. 164360035.33	E. 39185042.69
B6-4	N. 164359738.28	E. 39181566.50
B7-1	N. 164369180.63	E. 39185199.57
B7-2	N. 164369580.13	E. 39191061.16
B7-3	N. 164360262.71	E. 39188799.74
B7-4	N. 164359979.27	E. 39185313.69
D1-1	N. 164377072.27	E. 39190619.21
D1-2	N. 164377309.07	E. 39193896.36
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D4-4	N. 164371330.38	E. 39176392.90
D7-1	N. 164377433.23	E. 39171016.04
D7-2	N. 164382395.32	E. 39177389.93
D7-3	N. 164377619.81	E. 39177538.36
D8-1	N. 164383183.68	E. 39178457.27
D8-2	N. 164381817.33	E. 39182979.28
D8-3	N. 164377844.86	E. 39183100.13
D8-4	N. 164377635.16	E. 39178661.60
D9-1	N. 164381575.72	E. 39183783.86
D9-2	N. 164378104.06	E. 39193560.52
D9-3	N. 164377862.17	E. 39183829.49



THIS IS A TRUE AND CORRECT COPY OF THE ORIGINAL RECORD DRAWING AS SUBMITTED TO THE PUBLIC WORKS DEPARTMENT OF GALVESTON COUNTY, TEXAS, FOR RECORDING. THE ORIGINAL RECORD DRAWING IS FILED IN THE OFFICE OF THE COUNTY CLERK, GALVESTON COUNTY, TEXAS, UNDER PROJECT NO. 18481, DATED 12/15/2019.

NO.	DATE	BY	REVISIONS
0	01-08-20	CTL	ISSUED FOR FINAL RECORD

TEXAS CITY TANK FARM
DEED RECORDING EXHIBIT
GALVESTON COUNTY, TEXAS

ISSUED FOR FINAL RECORD
01-JAN-2020

SCALE	DATE
1"=200'	01-08-20
CTL	01-08-20
PHN	01-08-20
FILE NO.	TCTF-C-EX01.DWG
DATE	01-08-20
NO.	TCTF-C-EX01

01-08-20 1:51 PM
01-08-20 1:51 PM

FILED AND RECORDED

Instrument Number: 2020013043

Recording Fee: 46.00

Number Of Pages:7

Filing and Recording Date: 03/04/2020 12:10PM

I hereby certify that this instrument was FILED on the date and time stamped hereon and RECORDED in the OFFICIAL PUBLIC RECORDS of Galveston County, Texas.

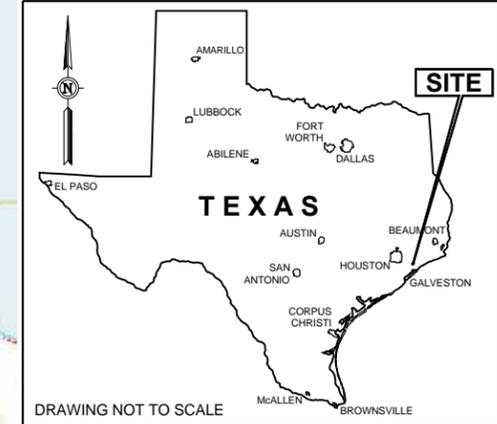
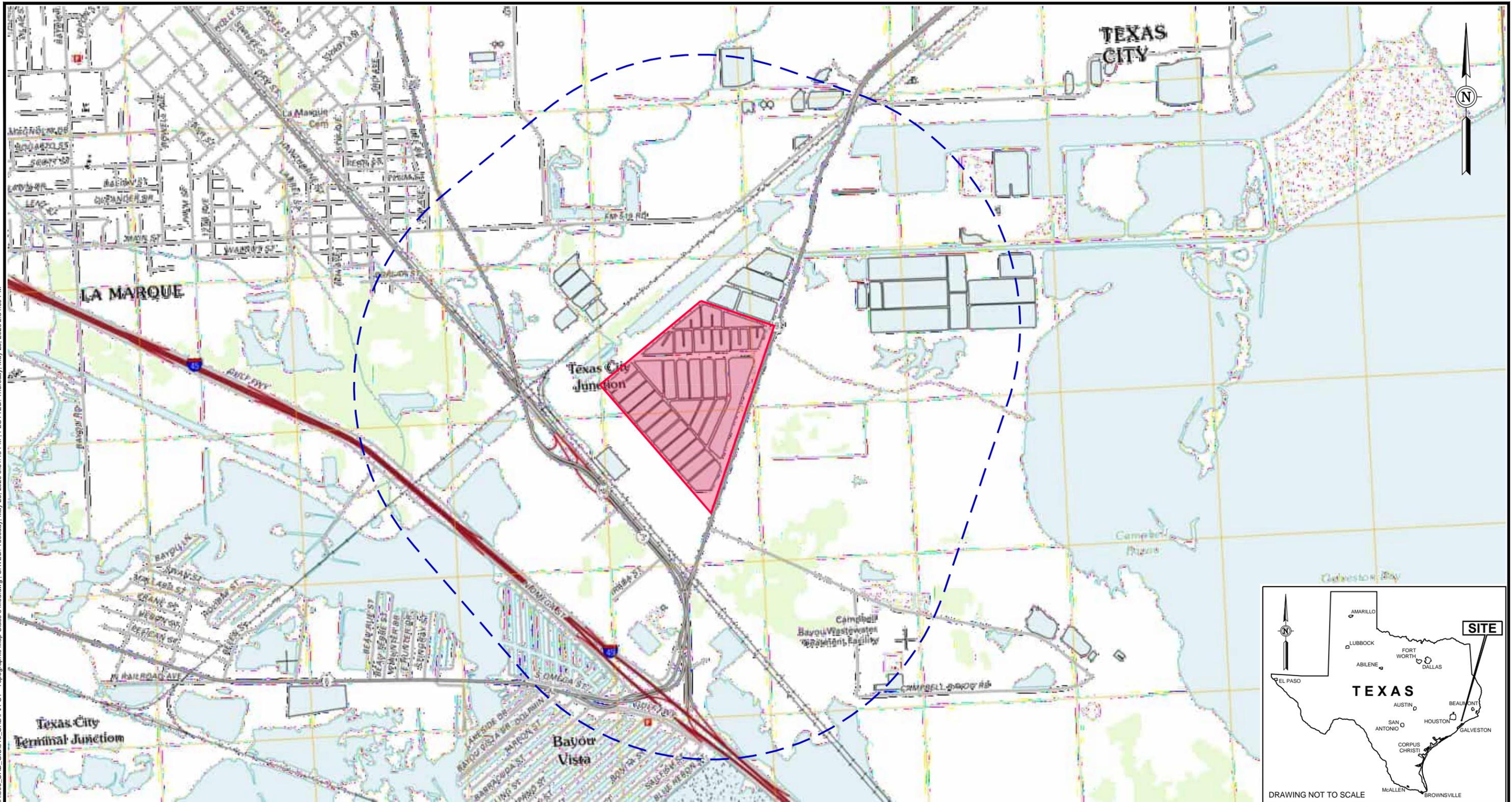


Dwight D. Sullivan

Dwight D. Sullivan, County Clerk
Galveston County, Texas

DO NOT DESTROY - *Warning, this document is part of the Official Public Record.*

FILE: O:\Projects\ENV\1060627710_MPCLTRCRA900_CAD_GIS\910_CAD\PIA-C1 - Topographic Map Class 3 Mod.dwg : PLOTTED: Tuesday, May 26, 2020 5:34:43 PM : SAVED: Tuesday, May 26, 2020 2:34:00 PM



2000 0 2000

SCALE IN FEET
(COORDINATE SYSTEM: NAD83 TEXAS STATE PLANES,
SOUTH CENTRAL ZONE, US FOOT)

1 0 1 km

SCALE IN KILOMETERS

LEGEND:

- BLANCHARD LTF BOUNDARY (196 acres)
- 1-MILE BUFFER

NOTES:

1. GRID SYSTEM BASED ON UTM WITH NAD83 DATUM, ZONE 15, METERS (UTM83-15) CONVERTED TO NAD83 TEXAS STATE PLANES, SOUTH CENTRAL ZONE, US FOOT (TX83-SCF).

AECOM
19219 KATY FREEWAY, SUITE 100
HOUSTON, TX 77094
PH: (281) 646-2400
FAX: (281) 646-2401

Title: **TOPOGRAPHIC MAP**
Project: **PART A APPLICATION - Dec 2025
RCRA PERMIT HW-50183
TEXAS CITY, GALVESTON COUNTY, TEXAS**

Scale: AS NOTED	Drawn by: NAB Chk'd by: MG	Date: 5-26-2020 Date: 5-26-2020
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Client: BLANCHARD REFINING COMPANY, LLC	File Name: PtA-C1 - Topographic Map Class 3 Mod.dwg	Figure PtA-C1
Project No.:		

SOURCE: U.S.G.S. 7.5-MINUTE SERIES TOPOGRAPHIC MAPS. TEXAS CITY (2013) AND VIRGINIA POINT (2013), TEXAS QUADRANGLES.

FILE: O:\Projects\ENV\1060627710_MPOLTRCRA900_CAD_GIS\910_CAD\PIA-C2 - Facility And Groundwater Wells.dwg ; SAVED: Wednesday, May 27, 2020 4:08:30 PM ; PLOTTED: Thursday, May 28, 2020 2:33:07 PM



SCALE IN FEET
(COORDINATE SYSTEM: NAD83 TEXAS STATE PLANES,
SOUTH CENTRAL ZONE, US FOOT)



LEGEND:

- BLANCHARD LTF BOUNDARY (196 acres)
- POINT OF COMPLIANCE WELL
- BACKGROUND WELL
- OBSERVATION WELL
- PUMPING WELL (ACTIVE)
- PUMPING WELL (INACTIVE)

AECOM
19219 KATY FREEWAY, SUITE 100
HOUSTON, TX 77094
PH: (281) 646-2400
FAX: (281) 646-2401

Title: **FACILITY BOUNDARIES AND GROUNDWATER WELLS MAP**

Project: PART A APPLICATION - Dec 2025
RCRA PERMIT HW-50183
TEXAS CITY, GALVESTON COUNTY, TEXAS

Scale: AS NOTED
Drawn by: NAB
Chk'd by: MG
Date: 5-26-2020

Client: **BLANCHARD REFINING COMPANY, LLC**
Project No.:
File Name:
Figure: PtA-C2

SOURCE: IMAGES PROVIDED BY H-GAC (HOUSTON-GALVESTON AREA COUNCIL) AND H-GAC DATA SERVICES GIS DEPT. IMAGES DATED FALL OF 2012.



LTF Site Photographs

Client Name:
Blanchard Refining Company LLC

Site Location: Texas City, TX
Permit 50183

Photo No.
P1

Date
1/17/2019

Description:
LTF Cell



Photo No.
P2

Date
1/17/2019

Description:
LTF Cell





LTF Site Photographs

Client Name:

Blanchard Refining Company LLC

Site Location: Texas City, TX

Permit 50183

Photo No.

P3

Date

1/17/2019

Description:

LTF Cell



Photo No.

P4

Date

12/3/2018

Description:

LTF Cell





LTF Site Photographs

Client Name:

Blanchard Refining Company LLC

Site Location: Texas City, TX

Permit 50183

Photo No.

P5

Date

Description:

Final construction photo



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Texas Commission on Environmental Quality Industrial & Hazardous Waste Part B Permit Application

I. General Information

Provide all Part B responsive information in Appendix I. When preparing the physical format organize your submittal using the [Format of Hazardous Waste permit Application and Instructions](#).

Provide responsive information in Appendix I.

a. [Complete Table 1 - General Information](#)

- b. For all incoming New, Renewal, Class 3 Permit Modification, and Major Amendment applications, the TCEQ requires that a Core Data Form (CDF) be submitted whether or not a change has occurred in the previously submitted form. For Minor Amendment, Class 1, Class 1¹, and Class 2 Permit Modification applications, the TCEQ requires that the CDF be only submitted if a change in any information in the previously submitted form has occurred at the time of the application submittal. For more information regarding the Core Data Form, call (512) 239 1575 or go to the TCEQ Web site at https://www.tceq.texas.gov/permitting/central_registry/guidance.html

c. [Signature on Application](#)

It is the duty of the operator to submit an application for a permit. The person who signs the application form will often be the operator himself; when another person signs on behalf of the applicant, his title or relationship to the applicant will be shown. In all cases, the person signing the form must be authorized to do so by the applicant. An application submitted by a corporation must be signed by a responsible corporate officer such as a president, secretary, treasurer, vice president, or by his duly authorized representative, if such representative is responsible for the overall operation of the facility from which the activity described in the form originates. In the case of a partnership or a sole proprietorship, the application must be signed by a general partner or the proprietor, respectively. In the case of a municipal, state, federal, or other public facility, the application must be signed by a principal executive officer, a ranking elected official, or another duly authorized employee. A person signing an application on behalf of an applicant must provide notarized proof of authorization.

- d. Complete Interim Status Land Disposal Unit(s) Certification, as applicable
e. Submit List and Map of Adjacent Landowners List, as applicable.

Table I: General Information

A. Applicant: Facility Operator

Name ¹	Blanchard Refining Company LLC
Address ²	2401 5th Avenue South; physical location Loop
City, State ²	197 S between Hwy 6 and 519
Zip Code ²	Texas City, Texas
Telephone Number	77590
Alternate Telephone Number	(409) 945-1011
TCEQ Solid Waste Registration No.	
EPA I.D. No.	34507
Permit No.	TXD072181381
County	50183
Regulated Entity Name	Galveston
Regulated Entity Reference Number (RN)	Blanchard Refining Land Treatment Facility
Customer Name ²	RN104085691
Customer Reference Number:	Blanchard Refining Company LLC
Charter Number ³	CN604166868
Previous or Former Names of the Facility (if applicable)	801666290

B. Facility Owner: Identify the Facility Owner if different than the Facility Operator⁴

Same as Facility Operator?

Name	Blanchard Refining Company LLC
Address	539 South Main Street
City, State	Findlay, Ohio
Zip Code	45840
Telephone Number	419-421-2121
Alternate Telephone Number	

C. Facility Contact

1. Persons or firms who will act as primary contact:

Name, Title:	Todd Palmer, Environmental Supervisor
Address	P.O. Box 401
City, State:	Texas City, TX
Zip Code	77592
Telephone Number	409-943-7248
Alternate Telephone Number	
E-mail	[REDACTED]

Persons or firms who will act as primary contact (if more than one):

Name, Title:	Jean Gould
Address	P.O. Box 401
City, State:	Texas City, TX
Zip Code	77592
Telephone Number	(210) 542-1334
Alternate Telephone Number	
E-mail	[REDACTED]

2. Agent in Service or Agent of Service (if you are an out-of-state company)⁵:

Name, Title:	CT Corporation System
Address	1999 Bryan St., Ste. 900
City, State:	Dallas, TX
Zip Code	75201-3136

3. Individual responsible for causing notice to be published:

Name:	Todd Palmer
Address	P.O. Box 401
City, State:	Texas City, TX
Zip Code	77592
Telephone Number	409-943-7248
Alternate Telephone Number	
E-mail	[REDACTED]

4. Public place in county where application will be made available⁶:

Name	Moore Memorial Public Library
Address	1701 9th Avenue North
City, State	Texas City, Texas
Zip Code	77590

D. Application Type and Facility Status

1. Application Type

- | | | |
|---|---|---|
| <input checked="" type="checkbox"/> Permit | <input type="checkbox"/> Amendment | <input checked="" type="checkbox"/> Modification |
| <input type="checkbox"/> New | <input type="checkbox"/> Major | <input checked="" type="checkbox"/> Class 3 |
| <input type="checkbox"/> Renewal | <input type="checkbox"/> Minor | <input type="checkbox"/> Class 2 |
| <input type="checkbox"/> Interim Status | | <input type="checkbox"/> Class 1 ¹ |
| <input type="checkbox"/> Compliance Plan | | <input type="checkbox"/> Class 1 |
| <input type="checkbox"/> RD&D | | |

2. Part of a Consolidated Permit Processing request? [30 TAC Chapter 33]

3. Does the application contain confidential material?⁷

4. Facility Status. Check all that apply

- | | |
|--|--|
| <input type="checkbox"/> Proposed | <input checked="" type="checkbox"/> On-Site |
| <input checked="" type="checkbox"/> Existing | <input type="checkbox"/> Off-site |
| | <input type="checkbox"/> Commercial |
| | <input type="checkbox"/> Recycle |
| | <input checked="" type="checkbox"/> Land Disposal |
| | <input type="checkbox"/> Areal or capacity expansion |
| | <input type="checkbox"/> Compliance plan |

5. Is the facility within the Coastal Management Program boundary?

6. Description of Application Changes

Complete Table I.1 - Description of Proposed Application Changes

Note: List all changes requested in Table. Unlisted requests risk remaining unaddressed or possibly denied if brought to the permit application reviewer's attention at a later time.

7. Total acreage of the facility being permitted:

8. Identify the name of the drainage basin and segment where the facility is located⁸

River Segment

River Basin

E. Facility Siting Summary:

Is the facility located or proposed to be located:

1. Within a 100-year floodplain?	Yes
2. in wetlands?	No
3. In the critical habitat of an endangered species of plant or animal?	No
4. On the recharge zone of a sole-source aquifer?	No
5. In an area overlying a regional aquifer?	Yes
6. Withing 0.5 mile (2,640 feet) of an established residence, church, school , day care center, surface water body used for public drinking water supply, or dedicated public park? ⁹ [30 TAC 335.202] If Yes: the TCEQ shall not issue a permit for this facility.	No
7. In an area in which the governing body of the country or municipality has prohibited the processing or disposal of municipal hazardous waste or industrial solid waste? If yes: provide a copy of the ordinance or order.	No

F. Wastewater and Stormwater Disposition

1. Is the disposal of any waste to be accomplished by a waste disposal well at this facility?

If Yes: List WDW Permit No(s):

2. Will any point source discharge of effluent or rainfall runoff occur as a result of the proposed activities?

3. If Yes, is this discharge regulated by a TPDES or TCEQ permit? Yes

TCEQ Permit No.

TPDES Permit No.

No

Date TCEQ discharge permit application filed:

Date TPDES discharge application filed:

G. Information Required to Provide Notice

State Officials List [30 TAC 39]

State Senator

Name:	MAYES MIDDLETON [REDACTED]
Address	1100 Congress Avenue Room 1.E.9
City, State:	Austin, TX
Zip Code:	78701

State Representative

Name:	TERRI LEO WILSON [REDACTED]
Address	1100 Congress Avenue Room E2.712
City, State:	Austin, TX
Zip Code	78701

Local Officials List [30 TAC 39]

Mayor

Name:	Mayor Dedrick Johnson [REDACTED]
Address	P.O. Box 2608
City, State:	Texas City, TX
Zip Code	77590-2608

Local Health Authority

Name:	Dr. Philip Keiser MD [REDACTED]
Address	P.O. Box 939
City, State:	Texas City, TX
Zip Code	77568-0939

County Judge

Name:	Mark Henry [REDACTED]
Address	722 Moody Ave Suite 200
City, State:	Galveston, TX
Zip Code	77550-2318

County Health Authority

Name:	Dr. Philip Keiser [REDACTED]
Address	P.O. Box 939
City, State:	Texas City, TX
Zip Code	77568-0939

Based on the questions in the Bilingual Notice Instructions for this form, are you required to make alternate (Bilingual) notice for this application?

Bilingual Language(s):

TCEQ Core Data Form Submitted?(Required)

Has any information changed on the TCEQ Core Data Form since the last submittal?

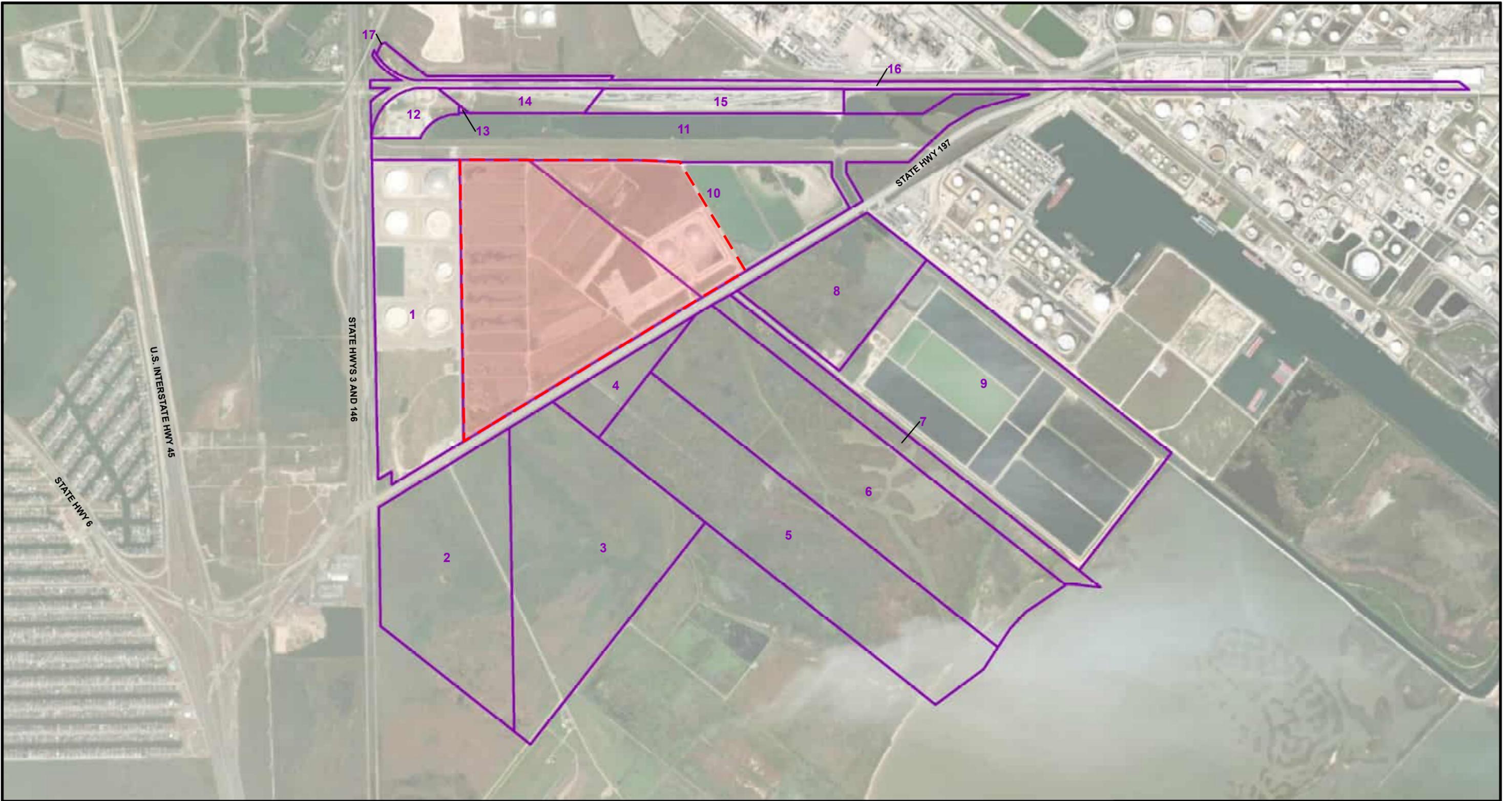
Signature on Application Submitted?
(see Section I Instructions, Item c)

1. Individual, Corporation, or Other Legal Entity Name on the Permit - must match the Secretary of State's database records for the Facility).
2. The legal name and address must match the Core Data Form.
3. If the application is submitted on behalf of a corporation, please identify the Charter Number as recorded with the Office of the Secretary of State for Texas.
4. The operator has the duty to submit an application if the facility is owned by one person and operated by another [30 TAC 305.43(b)]. The permit will specify the operator and the owner who is listed on Part A of this application [Section 361.087, Texas Health and Safety Code].
5. If the application is submitted by a corporation or by a person residing out of state, the applicant register an Agent in Service or Agent of Service with the Texas Secretary of State's office and provide a complete mailing address for the agent. The agent must be a Texas resident.
6. For applications for new permits, renewals, major amendments and Class 3 modifications a copy of the administratively complete application must be made available at a public place in the county where the facility is, or will be, located for review and copying by the public. Identify the public place in the county (e.g., public library, county court house, city hall), including the address, where the application will be made available for review and copying by the public.
7. For confidential information cross-reference the confidential material throughout the application to Section XIII: Confidential Material, and submit as a separate Section XIII document or binder conspicuously marked "CONFIDENTIAL".
8. Use the segments line map created by [TCEQ GIS Team](#) to find the Segment Name and Basin Name.
9. Use only for a new commercial hazardous waste management facility or areal expansion of an existing hazardous waste management facility or unit of that facility as defined in 30 TAC 335.202.

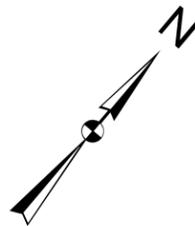
Table I.1-Description of Proposed Application Changes

Permit/Compliance Plan Application Appendix/Section	Brief Description of Proposed Change	Modification or Amendment Type	Supporting Regulatory Citation
Part B Closure and Post Closure Plans, General Engineering Report	Construction of a Gas Processing Unit (Frac2) over closed landfarm cells.	Class 3	30 TAC 305.69(k) K.3 K.4
General Engineering Report	Updated text describing new construction and storm water run-off management for closed cells. Updated Figure GE-1 showing extent of proposed construction. Added Attachment GE-4 for new construction figures, stormwater management design , and engineering evaluation of piling stability/clay cap integrity.	Class 3	30 TAC 305.69(k) K.3 K.4
Closure and Post Closure Plans	Updated for new construction and revised closure cost tables. Some figures edited for Frac2 proposed construction.	Class 3	30 TAC 305.69(k) K.3 K.4
Part B Section VIII	Financial Assurance edited for new closure costs and financial capability demonstration	Class 3	30 TAC 305.69(k) K.3 K.4

Document Path: M:\Dallas_GIS\Projects\BlanchardRefiningCompany\LCRCRA_Permit_HW50183\Map_Docs\Figures\Fig_I-1_Adjacent_Landowners_Map.mxd



SOURCE: IMAGES PROVIDED BY VANTOR
 IMAGES DATED 3/11/2025.
 LAND PARCELS - GALVESTON CENTRAL APPRAISAL DISTRICT;
 JULY 2025.



(COORDINATE SYSTEM: NAD83 TEXAS STATE PLANES,
 SOUTH CENTRAL ZONE, US FOOT)

LEGEND:

- BLANCHARD LTF BOUNDARY
(196 acres)
- ADJACENT LAND OWNER



19219 KATY FREEWAY, STE 100
 HOUSTON, TX 77094
 PH: (281) 646-2400
 FAX: (281) 646-2401

Title:
ADJACENT LANDOWNERS MAP

Project: PART B PERMIT CLASS 3 MODIFICATION
 APPLICATION DECEMBER 2025
 RCRA PERMIT HW-50183
 TEXAS CITY, GALVESTON COUNTY, TEXAS

Scale: AS NOTED	Drawn by: HP	Date: 12/2/2025
Chk'd by: ZK	Date: 12/2/2025	

Client: BLANCHARD REFINING COMPANY, LLC	Project No.: 60763800	File Name: Fig_I-1_Adjacent Landowners_Map.mxd	Figure No.: I-1
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Permitee: Blanchard Refining Company LLC - Land
Treatment Facility

Owner No.	Name	Contact	Address 1	Address 2	City	State	Zip
1	TEXAS CITY TERMINAL RAILWAY CO	ATTN: PROPERTY TAX DEPT	2425 HIGHWAY 146 N		TEXAS CITY	TX	77590-8811
2	SCENIC GALVESTON INC		20 COLONY PARK CIR		GALVESTON	TX	77551-1738
3	SCENIC GALVESTON INC		20 COLONY PARK CIR		GALVESTON	TX	77551-1738
4	SCENIC GALVESTON INC		20 COLONY PARK CIR		GALVESTON	TX	77551-1738
5	SCENIC GALVESTON INC		2201 MACARTHUR ST		HOUSTON	TX	77030
6	SCENIC GALVESTON INC		2201 MACARTHUR ST		HOUSTON	TX	77030
7	SCENIC GALVESTON INC		2201 MACARTHUR ST		HOUSTON	TX	77030
8	UNION CARBIDE CORP Dow Chemical Co.	TAX DEPT APB BLDG, FLOOR 4-A	332 SH 332 E		LAKE JACKSON	TX	77566
9	GULF COAST WASTE/DISP AUTH	%BP PROPERTY TAX DEPT	PO BOX 3092		HOUSTON	TX	77253-3092
10	BLANCHARD REFINING CO LLC	C/O MARATHON PETROLEUM CO LP	539 S MAIN ST		FINDLAY	OH	45840-3229
11	EXP-ROW	COUNTY OF GALVESTON LEVEE					
12	TEXAS CITY TERMINAL RAILWAY CO	ATTN: PROPERTY TAX DEPT	2425 HIGHWAY 146 N		TEXAS CITY	TX	77590-8811
13	TEXAS CITY TERMINAL RAILWAY CO	ATTN: PROPERTY TAX DEPT	2425 HIGHWAY 146 N		TEXAS CITY	TX	77590-8811
14	TEXAS CITY TERMINAL RAILWAY CO	ATTN: PROPERTY TAX DEPT	2425 HIGHWAY 146 N		TEXAS CITY	TX	77590-8811
15	TEXAS CITY TERMINAL RAILWAY CO	ATTN: PROPERTY TAX DEPT	2425 HIGHWAY 146 N		TEXAS CITY	TX	77590-8811
16	TEXAS CITY TERMINAL RAILWAY CO	ATTN: PROPERTY TAX DEPT	2425 HIGHWAY 146 N		TEXAS CITY	TX	77590-8811
17	TEXAS CITY TERMINAL RAILWAY CO	ATTN: PROPERTY TAX DEPT	2425 HIGHWAY 146 N		TEXAS CITY	TX	77590-8811

UNION CARBIDE DOW CHEMICAL CO
TAX DEPT APB BLDG
SH 332 E
LAKE JACKSON TX 77566

GULF COAST WASTE DISPOSAL AUTHORITY
BP PROPERTY TAX DEPT
PO BOX 3092
HOUSTON TX 77253

BLANCHARD REFINING CO LLC
539 SOUTH MAIN ST
FINDLAY OH 45840

EXP-ROW GALVESTON COUNTY
722 MOODY AVE
GALVESTON TX 77550

TEXAS CITY TERMINAL RAILWAY CO
ATTN: PROPERTY TAX DEPT
2425 HWY 146 N
TEXAS CITY TX 77590

SCENIC GALVESTON
20 COLONY PARK CIRCLE
GALVESTON TX 77551

ADJACENT PROPERTY OWNERS

Signature Page

I, Travis Beltz, Vice President Refining
(Operator) (Title)

certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Signature: [Handwritten Signature] Date: 1/27/26

To be completed by the Operator if the application is signed by an Authorized Representative for the Operator

I, _____, hereby designate _____
[Print or Type Name] [Print or Type Name]

as my representative and hereby authorize said representative to sign any application, submit additional information as may be requested by the Commission; and/or appear for me at any hearing or before the Texas Commission on Environmental Quality in conjunction with this request for a Texas Water Code or Texas Solid Waste Disposal Act permit. I further understand that I am responsible for the contents of this application, for oral statements given by my authorized representative in support of the application, and for compliance with the terms and conditions of any permit which might be issued based upon this application.

Printed or Typed Name of Operator or Principal Executive Officer

Signature

SUBSCRIBED AND SWORN to before me by the said Travis Beltz

On this 27 day of January, 2026

My commission expires on the 17 day of September, 2028

Notary Public in and for Galveston County, Texas

[Note: Application Must Bear Signature & Seal of Notary Public]

[Handwritten Signature: Vicky L. Davila]



Signature Page

I, Travis Beltz, Vice President Refining,
(Operator) (Title)

certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Signature: [Handwritten Signature] Date: 12/15/25

To be completed by the Operator if the application is signed by an Authorized Representative for the Operator

I, _____, hereby designate _____
[Print or Type Name] [Print or Type Name]

as my representative and hereby authorize said representative to sign any application, submit additional information as may be requested by the Commission; and/or appear for me at any hearing or before the Texas Commission on Environmental Quality in conjunction with this request for a Texas Water Code or Texas Solid Waste Disposal Act permit. I further understand that I am responsible for the contents of this application, for oral statements given by my authorized representative in support of the application, and for compliance with the terms and conditions of any permit which might be issued based upon this application.

Printed or Typed Name of Operator or Principal Executive Officer

Signature

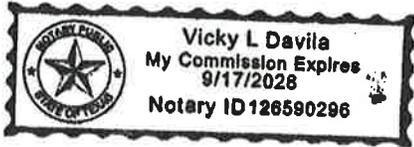
SUBSCRIBED AND SWORN to before me by the said Travis Beltz

On this 15 day of December, 2025

My commission expires on the 17 day of September, 2028

Notary Public in and for Galveston County, Texas
[Note: Application Must Bear Signature & Seal of Notary Public]

Vicky L. Davila





TCEQ Core Data Form

SECTION I: General Information

1. Reason for Submission (If other is checked please describe in space provided.)		
<input type="checkbox"/> New Permit, Registration or Authorization (Core Data Form should be submitted with the program application.)		
<input type="checkbox"/> Renewal (Core Data Form should be submitted with the renewal form)	<input checked="" type="checkbox"/> Other Class 3 Permit Modification	
2. Customer Reference Number (if issued)	Follow this link to search for CN or RN numbers in Central Registry**	3. Regulated Entity Reference Number (if issued)
CN 604166868		RN 104085691

SECTION II: Customer Information

4. General Customer Information		5. Effective Date for Customer Information Updates (mm/dd/yyyy)	
<input type="checkbox"/> New Customer		<input checked="" type="checkbox"/> Update to Customer Information	
<input type="checkbox"/> Change in Legal Name (Verifiable with the Texas Secretary of State or Texas Comptroller of Public Accounts)		<input type="checkbox"/> Change in Regulated Entity Ownership	
<i>The Customer Name submitted here may be updated automatically based on what is current and active with the Texas Secretary of State (SOS) or Texas Comptroller of Public Accounts (CPA).</i>			
6. Customer Legal Name (If an individual, print last name first: eg: Doe, John)		<i>If new Customer, enter previous Customer below:</i>	
Blanchard Refining Company LLC			
7. TX SOS/CPA Filing Number	8. TX State Tax ID (11 digits)	9. Federal Tax ID (9 digits)	10. DUNS Number (if applicable)
801666290	32049194742	371700623	
11. Type of Customer:	<input checked="" type="checkbox"/> Corporation	<input type="checkbox"/> Individual	Partnership: <input type="checkbox"/> General <input type="checkbox"/> Limited
Government: <input type="checkbox"/> City <input type="checkbox"/> County <input type="checkbox"/> Federal <input type="checkbox"/> Local <input type="checkbox"/> State <input type="checkbox"/> Other	<input type="checkbox"/> Sole Proprietorship	<input type="checkbox"/> Other:	
12. Number of Employees		13. Independently Owned and Operated?	
<input type="checkbox"/> 0-20 <input type="checkbox"/> 21-100 <input type="checkbox"/> 101-250 <input type="checkbox"/> 251-500 <input checked="" type="checkbox"/> 501 and higher		<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
14. Customer Role (Proposed or Actual) – as it relates to the Regulated Entity listed on this form. Please check one of the following			
<input type="checkbox"/> Owner <input type="checkbox"/> Operator <input checked="" type="checkbox"/> Owner & Operator <input type="checkbox"/> Other:			
<input type="checkbox"/> Occupational Licensee <input type="checkbox"/> Responsible Party <input type="checkbox"/> VCP/BSA Applicant			
15. Mailing Address:	539 South Main Street		
	City	Findlay	State OH ZIP 45840 ZIP + 4 3229
16. Country Mailing Information (if outside USA)		17. E-Mail Address (if applicable)	
18. Telephone Number	19. Extension or Code	20. Fax Number (if applicable)	
(419) 422-2121		() -	

SECTION III: Regulated Entity Information

21. General Regulated Entity Information (If "New Regulated Entity" is selected, a new permit application is also required.)							
<input type="checkbox"/> New Regulated Entity <input type="checkbox"/> Update to Regulated Entity Name <input checked="" type="checkbox"/> Update to Regulated Entity Information							
<i>The Regulated Entity Name submitted may be updated, in order to meet TCEQ Core Data Standards (removal of organizational endings such as Inc, LP, or LLC).</i>							
22. Regulated Entity Name (Enter name of the site where the regulated action is taking place.)							
Blanchard Refining Land Treatment Facility							
23. Street Address of the Regulated Entity: (No PO Boxes)	Physical location provided below						
	City	Texas City	State	TX	ZIP	77590	ZIP + 4
24. County	Galveston						

If no Street Address is provided, fields 25-28 are required.

25. Description to Physical Location:	Loop 197 S between State HWY 6 and FM 519						
26. Nearest City	State				Nearest ZIP Code		
Texas City	TX				77590		
<i>Latitude/Longitude are required and may be added/updated to meet TCEQ Core Data Standards. (Geocoding of the Physical Address may be used to supply coordinates where none have been provided or to gain accuracy).</i>							
27. Latitude (N) In Decimal:	29.343851			28. Longitude (W) In Decimal:	-94.928389		
Degrees	Minutes	Seconds	Degrees	Minutes	Seconds		
29	20	37.87	-94	55	42.19		
29. Primary SIC Code (4 digits)	30. Secondary SIC Code (4 digits)		31. Primary NAICS Code (5 or 6 digits)		32. Secondary NAICS Code (5 or 6 digits)		
2911			32411				
33. What is the Primary Business of this entity? (Do not repeat the SIC or NAICS description.)							
Petroleum Refinery (Land Treatment Facility)							
34. Mailing Address:	PO Box 401						
	City	Texas City	State	TX	ZIP	77592	ZIP + 4
35. E-Mail Address:							
36. Telephone Number	37. Extension or Code			38. Fax Number (if applicable)			
(409)-943-7022 (Jan Werner)				() -			

39. TCEQ Programs and ID Numbers Check all Programs and write in the permits/registration numbers that will be affected by the updates submitted on this form. See the Core Data Form instructions for additional guidance.

<input type="checkbox"/> Dam Safety	<input type="checkbox"/> Districts	<input type="checkbox"/> Edwards Aquifer	<input type="checkbox"/> Emissions Inventory Air	<input checked="" type="checkbox"/> Industrial Hazardous Waste
				50183
<input type="checkbox"/> Municipal Solid Waste	<input type="checkbox"/> New Source	<input type="checkbox"/> OSSF	<input type="checkbox"/> Petroleum Storage Tank	<input type="checkbox"/> PWS
<input type="checkbox"/> Sludge	<input checked="" type="checkbox"/> Storm Water	<input type="checkbox"/> Title V Air	<input type="checkbox"/> Tires	<input type="checkbox"/> Used Oil
	WQ0000443000			
<input type="checkbox"/> Voluntary Cleanup	<input type="checkbox"/> Wastewater	<input type="checkbox"/> Wastewater Agriculture	<input type="checkbox"/> Water Rights	<input checked="" type="checkbox"/> Other: Solid Waste
				34507

SECTION IV: Preparer Information

40. Name:	Todd Palmer	41. Title:	Env Supervisor, Waste and Water
42. Telephone Number	43. Ext./Code	44. Fax Number	45. E-Mail Address
(409) 943-7248		(409) 941-8292	[REDACTED]

SECTION V: Authorized Signature

46. By my signature below, I certify, to the best of my knowledge, that the information provided in this form is true and complete, and that I have signature authority to submit this form on behalf of the entity specified in Section II, Field 6 and/or as required for the updates to the ID numbers identified in field 39.

Company:	Blanchard Refining Company LLC	Job Title:	Vice President Refining
Name (In Print):	Travis Beltz	Phone:	(409)-945-1141
Signature:		Date:	12/15/25

VII. Closure and Post-Closure Plans

Provide all Part B responsive information in Appendix VII. When preparing the physical format organize your submittal using the [Format of Hazardous Waste permit Application and Instructions](#).

For multiple units provide an include all Part B responsive information in a separate Appendix for each unit.

Submit a full closure plan and post-closure plan, if applicable, which contains all the information required by 30 TAC 335.8, 335.169, 335.172, 335.174, 335.177, 335.178, 335.551-335.569, 30 TAC Chapter 350, 40 CFR 264.112, 264.118, 264.178, 264.197, 264.228, 264.258, 264.280, 264.310, 264.351, 264.575, 264.601, 264.603, 264.1102, 270.14(b)(13), 270.17(f), 270.18(h), 270.20(f), 270.21(e), 270.23(a)(2) & (3), and 270.26(c)(16) where applicable. The owner of property on which an existing disposal facility is located must also submit documentation that a notation has been placed in the deed to the facility that will in perpetuity notify any potential purchasers of the property that the land has been used to manage hazardous wastes and its use is restricted (see 30 TAC 335.5). For hazardous waste disposal units that were closed before submission of the application, the applicant should submit documentation to show that plats and notices required under 40 CFR 264.116 and 264.119 have been filed.

A. Closure

This section applies to the owners and operators of all hazardous waste management facilities to be permitted. The applicant must close the facility in a manner that minimizes need for further maintenance and controls, or eliminates, to the extent necessary to protect human health and the environment, the post-closure release of hazardous waste, hazardous constituents, leachate, contaminated rainfall, or waste decomposition products to the groundwater, surface waters, or to the atmosphere.

The facility type and type of unit to be closed can determine the level of detail sufficient for a closure plan.

For each unit to be permitted, complete [Table VII.A](#), - Unit Closure and list the facility components to be decontaminated, possible methods of decontamination, and possible methods of disposal of wastes and waste residues generated during unit closure. All ancillary components must be included in calculating closure cost estimates.

Additionally, if the applicant plans to close a surface impoundment in accordance with 30 TAC 335.169(a)(1) and the impoundment does not comply with the liner requirements of 30 TAC Section 335.168(a) then the closure plan for the impoundment must include both a plan for complying with 30 TAC 335.169(a)(1) and a contingent plan for complying with 30 TAC 335.169(a)(2).

Guidance on design of a closure cap and final cover for landfills is given in TCEQ Technical Guideline No. 3, and EPA publication 530-SW-85-014 presents guidance on construction quality assurance of liner construction.

If a waste pile does not comply with the liner requirements of 30 TAC Section 335.170(a)(1) then the closure plan for the waste pile must include both a plan for complying with 40 CFR 264.258(a) and a contingent plan for complying with 40 CFR 264.258(b).

The final certification of closure of a land treatment unit may be prepared by an independent licensed Professional Geoscientist in lieu of an independent licensed Professional Engineer. [30 TAC 335.172(b)]

B. Closure Cost Estimate (including contingent closure) [30 TAC 335.178, 40 CFR 264.142]

This section applies to owners or operators of all hazardous waste facilities, except state and federal agencies. A detailed estimate, in current dollars, of the cost of closing the facility should be included in the report. The cost estimate must include the cost of closure at the point in the facilities operating life when the extent and manner of its operation would make closure the most expensive. The TCEQ has published Technical Guideline No. 10, Closure and Post-Closure Cost Estimates, for calculating closure costs which should be consulted. Closure costs should be developed on the basis of abandonment of the site at full capacity and closure activities to be conducted by a third party with no operable on-site equipment. The costs for closing each unit must be detailed.

1. If closure costs are based on contractor bids, the applicant should submit a copy of the bid specification and each contractor's response.
2. If closure costs are based on a detailed analysis, the applicant should submit details of item costs and number of each item, and details of costs for equipment rental, third party labor and supervision, transportation, analytical costs, etc. Provide an itemized cost on [Table VII.B](#), - Unit Closure Cost Estimate for a complete, third party permitted facility closure.
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.
3. The closure plan may propose on-site disposal of wastes, residues, etc. during closure of a unit, and this may be executed if on-site capacity exists in other units during closure of a unit. However, the cost estimate for closure must be based on off-site shipment and disposal during closure of all wastes, waste residues, wastes generated by decontamination, contaminated stormwater, and leachate.
4. For each surface impoundment, waste pile, or tank system required to have a contingent closure plan, the cost for closure under the contingent closure plan should be detailed, as well as the cost of proposed closure. The more expensive of the cost of the proposed closure of a unit versus the cost of the contingent closure of the unit should be used in the total facility closure cost estimate.

C. Post-closure

This section applies to owners or operators of all hazardous waste disposal facilities. This section also applies to certain waste piles, tanks and surface impoundments from which the owner or operator intends to remove wastes at closure but which are required to have contingent post-closure plans.

For Landfills, and Waste Piles, Surface Impoundments, and Tanks Closed as a Landfill

1. Provide as-built plans and specifications for the final cover system, individually for each unit that is sealed, signed and dated by a licensed professional engineer with current Texas registration along with the Registered Engineering Firm's name and

Registration Number would satisfy this requirement; Other as-built plans and specifications for the unit may be submitted upon request.

2. Complete the following tables, as applicable:

a. [Complete Table VII.G - Post Closure Period.](#)

b. Complete [Table V.G.1](#) - Landfills and list the landfills (and number of cells, if applicable) covered by this application. List the waste(s) managed in each unit and the rated capacity or size of the unit. If wastes are segregated in some manner, list the cell number in which wastes are placed next to each waste type.

c. [Table V.G.3.](#) - Landfill Liner System and specify the type of liner used for the landfill.

d. [Table V.G.4.](#) - Landfill Leachate Collection System used for the landfill.

e. [Table V.E.1](#) - Waste Piles and list the waste piles covered by this application. List the waste managed in each unit and the rated capacity or size of the unit.

f. [Table V.E. 3](#) - Waste Pile Liner System and specify the type of containment/liner system.

g. [Table V.D.1](#) - Surface Impoundments and list the surface impoundments, covered by this application, to be permitted. List the waste(s) managed in each unit and the rated capacity or size of each unit.

h. [Table V.D. 6.](#) - Surface Impoundment Liner System for each surface impoundment to be permitted.

i. [Table V.C.](#) Tanks and Tank Systems.

Post-closure care of each hazardous waste management unit must continue for 30 years after the date of completing closure of the unit and must consist of monitoring and reporting of the groundwater monitoring systems in addition to the maintenance and monitoring of waste containment systems. Continuation of certain security requirements may be necessary after the date of closure. Post-closure use of property on or in which hazardous waste remains after closure must never be allowed to disrupt the integrity of the containment system. In addition, submit the following information.

1. The post-closure care plan for a landfill or of a surface impoundment, waste pile, miscellaneous unit, or tank system closed with wastes or waste constituents left in place, or closed under a contingent closure plan, must demonstrate compliance with 30 TAC 335.174(b).
2. The name, address, and phone number of the person or office to contact about the disposal facility during the post-closure period; and
3. A discussion of the future use of the land associated with each unit.
4. For landfills, surface impoundments, waste piles, and land treatment areas closed under interim status, submit the required documentation of 40 CFR 270.14(b)(14).
5. Landfills, surface impoundments, waste piles and land treatment areas that received hazardous wastes after July 26, 1982 or for which closure was certified after January 26, 1983 must be included in post-closure care plans unless they have been determined to have closed by removal equivalent to the closure standards in 40 CFR 264 Subpart G. If such a demonstration has been made pursuant to 40 CFR 270.1(c)(5), but an equivalency determination has not been

made, please submit a copy of the demonstration documentation. If an equivalency determination has been made pursuant to 40 CFR 270.1(c)(6), applicant should submit a copy of the determination. Complete [Table VII.C.5](#). - Land-Based Units Closed Under Interim Status for all land based units closed under interim status.

D. Post-closure Cost Estimate [40 CFR 264.144]

This section regarding post-closure cost estimate applies to owners or operators of all hazardous waste disposal facilities, except state and federal agencies, and certain waste piles, tank systems, and surface impoundments from which the owner or operator intends to remove wastes at closure, but which are required to have contingent closure and post-closure plans. A detailed estimate, in current dollars, of the annual cost of monitoring and maintenance of the facility in accordance with the applicable post-closure regulations must be included in the report. The TCEQ has published Technical Guideline No. 10 for calculating post-closure costs, which should be consulted. Costs should be developed in detail for 30 years of post-closure care activities to be conducted by a third party, for each applicable unit.

1. The applicant should submit details of item costs and number of each item for off-site disposal of leachate and bailed monitor well water, labor and supervision, monitor well sampling and analyses, inspection and repair of the cap(s), mowing and re-seeding of the vegetative cover, maintaining site security, etc. Provide an itemized cost estimate on [Table VII.D](#). - Unit Post-Closure Cost Estimate for complete, third party permitted facility post-closure care.
2. 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.
3. Total annual cost of post-closure care for the facility including costs of contingent post-closure care should be multiplied by 30 years.

E. Closure and Post-Closure Cost Summary

Please Complete [Table VII.E.1](#). - Permitted Unit Closure Cost Summary

Please Complete [Table VII.E.2](#). - Permitted Unit Post-Closure Cost Summary

Table VII.A. - Unit Closure

For each unit to be permitted, list the facility components to be decontaminated, the possible methods of decontamination, and the possible methods of disposal of wastes and waste residues generated during unit closure:

Equipment or HWM Unit	Possible Methods of Decontamination ¹	Possible Methods of Disposal ¹
Oil Skimmers	High Pressure Wash	Authorized on- or off- site facility
Electric Pump	High Pressure Wash	Authorized on- or off- site facility
Truck Wash Area	High Pressure Wash	Authorized on- or off- site facility
Construction Equipment (i.e., bulldozer, tractor, backhoes,	High Pressure Wash	Authorized on- or off- site facility
Biosludge Piping	High Pressure Wash	Authorized on- or off- site facility

1. Applicants may list more than one appropriate method.

Table VII.B. - Unit Closure Cost Estimate

Task	Cost
Name of Permitted Unit: Land Treatment Facility (LTF)	
Decontaminate / Remove Sludge Pipeline	220,000
Semi-annual sampling (2 year soil, groundwater, ZOI, misc)	380,000
Analysis of samples (2 years soil, groundwater, ZOI, misc)	200,000
Grading, tilling, mowing, storm water mgt, routine O&M (2 years)	800,000
Vegetative Cover ("A" cells)	247,500
Survey	15,000
Closure Certification Negotiations / Report	100,000
Legal/Consulting (data management, annual reporting)	220,000
Total Unit Closure Cost (2023 Basis, inflation adjustments below)	2,600,000
Total Unit Closure Cost (2024 Basis, inflation adjustments below)	2,700,000

Year	Inflation Factor	Adjusted Closure Cost
2019 starting basis		\$2,180,000
2020	0.012	\$2,210,000
2021	0.042	\$2,300,000
2022	0.07	\$2,460,000
2023	0.036	\$2,550,000
Total Closure Cost (2023 Basis)		\$2,600,000
Total Closure Cost (2024 Basis*)		\$2,700,000

*2.4% inflation factor applied to 2023 cost

Table VII.D. - Unit Post-Closure Cost Estimate

Task	Cost
Name of permitted unit: Land Treatment Facility	
Groundwater Sampling	940,000
Groundwater Analysis	660,000
Unsaturated Zone Sampling	880,000
Unsaturated Zone Analysis	520,000
Miscellaneous Sampling	70,000
Miscellaneous Analysis	300,000
Reporting/Consulting	2,100,000
Inspections/O&M (seeding, watering, mowing, fertilizer, erosion control)	6,330,000
Subtotal	11,800,000
Contingency (20%)	2,360,000
Year(s) of Post-Closure	30
Total Unit Post Closure Cost (2023 Basis, inflation adjustments below)	16,600,000
Total Unit Post Closure Cost (2024 Basis, inflation adjustments below)	17,000,000

Notes:

Groundwater sampled semi-annually for 5 years, annually for years 6-30

Soil cores sampled semi-annual first 3 years, annually for years 4-30

Adjusted Cost for inflation to 2024 dollars

Year	Inflation Factor	Adjusted Closure Cost
2020	0.012	\$14,370,000
2021	0.042	\$14,970,000
2022	0.07	\$16,020,000
2023	0.036	\$16,600,000
2024	0.024	\$17,000,000

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

Existing Unit Closure Cost Estimate		
Unit		Cost
Blanchard LTF (Vegetative cover for A Cells)		\$2,700,000
Total Existing Unit Closure Cost Estimate ¹	Year 2024	\$2,700,000

Proposed Unit Closure Cost Estimate		
Unit		Cost
Total Proposed Unit Closure Cost Estimate Footnote		

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 recalculating the revised total cost in current dollars.

Table VII.E.2. - Permitted Unit Post-Closure Cost Summary

Existing Unit Closure Cost Estimate	
Unit	Cost
LTF (2024 Cost Basis, all cells)	\$17,000,000
Total Existing Unit Post-Closure Cost Estimate ¹	\$17,000,000

Proposed Unit Post-Closure Cost Estimate	
Unit	Cost
Total Proposed Unit Post-Closure Cost Estimate	

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.



Environmental

Submitted to

Submitted by
AECOM
800 Gessner Rd., Suite 1200
(Rev Date - December 2025)

LTF Closure and Post Closure Care Plans

Blanchard Refining Company LLC Land Treatment Facility
Permit 50183

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¹ *Unchanged and omitted from the December 2025 submittal for brevity*

List of Attachments

Attachment 1	Soil Boring Sample Results for Cells in Tank Farm Construction Area (omitted from this submittal for brevity)
Attachment 2	Geosynthetic Clay Liner Specifications (omitted from this submittal for brevity)
Attachment 3	Copy of Closure Certification Report for Tank Farm Construction Area Cells and Staging Pile Cells (omitted from this submittal for brevity)
Attachment 4	Closure Petition for CAMU Cells and Staging Pile Cells (omitted from this submittal for brevity)

1.0 Introduction

1.1 Background

Blanchard Refining Company LLC (Blanchard) owns and operates a land treatment facility (LTF) near its Texas City, Texas Galveston Bay Refinery (GBR). The LTF is currently under Delay of Closure operation, managing only non-hazardous wastes from the GBR. The primary non-hazardous waste that has been applied to the LTF under Delay of Closure is biosolids from the refinery's wastewater treatment plant. Hazardous waste has not been applied to the LTF for more than 10 years. **Figure CP-1a** presents a plan view of the current layout of the Blanchard LTF.

The LTF consists of 139 active acres, including 31 land treatment cells and two former runoff management ditches known as Old Wah Chang Ditch (OWC) and the Main Collection Ditch (MCD). The LTF is divided into 31 cells; 11 cells remain under active operation under Permit 50183, 10 cells were closed for tank farm construction, 7 cells were converted to treatment Corrective Action Management Units (CAMUs) to manage soils excavated during tank farm construction, 2 cells were used as temporary staging piles during tank farm construction, and 1 cell is in post-closure care. Blanchard has closed the CAMU and staging pile cells in-place with a clay cap and covered the post-closure cell with a clay cap to allow for construction of a natural gas liquids processing facility (NGL Processing Facility) over the closed cells. The NGL Processing Facility consists of two projects referred to in this application as Frac1 and Frac2. Attachments GE-3 (Frac1) and GE-4 (Frac2) of the General Engineering Report present a plan view of the proposed NGL Processing Facility.

A RCRA Facility Investigation (RFI) was performed on the two former runoff management ditches and final excavation and backfilling of the ditches were completed in accordance with the requirements of a Corrective Measures Implementation (CMI) Workplan approved by the TNRCC (now TCEQ) by letter dated June 20, 1994.

In February 2016, Blanchard submitted a Class 2 permit modification (approved in June 2016) requesting approval for closure of cells in the tank farm area and authorization for Staging Pile Cells. Blanchard subsequently submitted a Class 3 modification in June 2016 requesting approval for conversion of seven of Remaining Active Cells to Treatment CAMUs for long-term treatment of soil excavated during Tank Farm Construction. The closure methods for LTF cells, including the tank farm area Cells, and updates to the closure methods for the Treatment CAMU cells and Staging Pile Cells, are provided in this Closure and Post Closure Plan.

Blanchard closed a portion of the LTF to allow a new tank farm to be constructed on the closed cells. The tank farm is operated by Marathon Pipe Line LLC (MPL). A copy of the Closure Certification Report for the tank farm area cells is included as **Attachment 3**. Blanchard has completed closure of another portion of the LTF (in-place closure of CAMU and Staging Pile cells) so that a natural gas liquids processing, storage and export facility (called Frac1) can be constructed over the closed cells. These cells were closed in place with a clay cap from January 8, 2025 to July 22, 2025. Frac1 is being constructed and operated by MPLX (midstream affiliate of Marathon Petroleum). Beginning in 2027, MPLX plans to develop a second natural gas processing facility at the LTF (called Frac2); Frac2 construction will occur over a portion of the cells closed during the Frac1 closure. Details of the Frac1 and Frac2 construction are provided in the General Engineering Report. Frac1 and Frac2 are two projects commonly referred to in this application as the NGL Processing Facility.

Closure activities for the NGL Processing Facility were similar to activities conducted for the tank farm area cells. For the tank farm cells, closure activities included:

- Addition of fill material for site grading and road base over the 12-inch compacted clay cover system installed during the partial closure stage;

- Installation of foundations for two tanks;
- Installation of two tanks;
- Construction of tank containment berms;
- Installation of a Geosynthetic Clay Liner (GCL) in the Tank Farm and Pump Manifold Areas; and
- Improvements to site storm water handling systems.

For the NGL Processing Facility (Frac1), closure activities included:

- Addition of fill material for site grading and road base over the 12-inch compacted clay cover;
- Installation of pilings for the tanks and processing equipment
- Installation of foundations for tanks and processing equipment;
- Installation of tanks, process equipment, piping, appurtenances; and
- Improvements to site storm water handling systems.

Terminology used in this plan to differentiate the cells and their closure methods are defined below. **Figure GE-1 in the General Engineering Report** shows the LTF and the current operational designation of the cells.

Terminology Used for Closure Areas

Terminology	Description
Tank Farm Area	Tanks, pipe manifold, pumps, meters, and berms within the NGL Processing Facility Construction Area approved during the 2016 Class 3 permit modification. Cells in the Tank Farm Area were closed in place as approved in the 2016 Class 3 permit modification.
Gas Processing Construction Area	Entire area of construction, consisting of the previously constructed Tank Farm Area and the two proposed Frac1 and Frac2 projects that comprise the NGL Processing Facility. Cells within the NGL Processing Facility Construction Area were closed in place with a soil cover system as approved in the January 2024 Class 3 permit modification (approved March 2025).
Remaining Active Cells	Cells outside the NGL Processing Facility Construction Area (A1 through A11) that will continue to be operated and maintained by the current permit (i.e. application of approved non-hazardous waste only).
Treatment CAMU Cells	Cells that were converted to Treatment Corrective Action Management Unit (CAMU) Cells to treat soil excavated during Tank Farm construction (C1, C2, C3, B2, B3, B4, and D5) and have been closed in-place for the NGL Processing Facility construction.
Staging Pile Cells	Cells used for temporary staging of soils excavated during tank farm construction (B1 and D6) and have been closed in-place for the NGL Processing Facility construction activities.

1.2 Purpose

This closure plan addresses the procedures and activities for the final closure of the LTF. The closure procedures provided in this plan include:

- Closure for Remaining Active Cells
- All other cells in the Tank Farm Area and the NGL Processing Facility Construction Area have been closed in place with a soil cover system.

Closure procedures, as described herein, are in accordance with 40 CFR Part 264, Subpart G, 40 CFR 264.280, 30 TAC Chapter 350 (TRRP), 40 CFR 264.554(j), 30 TAC 335.152(a)(5), 335.172(a), and Permit No. HW-50183-001. This plan will be revised if changes in facility operations affect procedures outlined in this plan.

The contact person for closure activities at the LTF is:

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[REDACTED]

1.3 Factors in Addressing Closure

This section discusses the following factors that are pertinent to the development of a closure plan:

- ▶ Description of applied wastes;
- ▶ Characterization of treated material remaining in the NGL Processing Facility Construction Area cells
- ▶ Mobility and migration potential;
- ▶ Site geology and hydrology; and
- ▶ Waste residue characterization in the unsaturated zone.

1.3.1 Description of Applied Wastes

This subsection highlights the major constituents of concern in the wastes currently and historically applied to the LTF. The land treatment facility has not received hazardous waste since the permit was renewed under Delay of Closure operations in 2011. The permit limits loading to the LTF at 75,000 dry tons per year. Prior to Delay of Closure operations from 1988-2009, the LTF received approximately 367,000 dry tons of hazardous waste. The total quantity of waste (both hazardous and non-hazardous) over the same time period is approximately 1.25 million dry tons.

Presuming delay of closure, no additional hazardous waste will be applied to facility. The previously approved CAMU cells (D-3 and D-4) will not receive any waste and stay within the lifetime maximum loading of 86,500 cubic yards (approximately 95,000 dry tons). The Treatment CAMU Cells included in the 2016 Class 3 permit modification (CAMU II Cells) treated only previously treated soil excavated during tank farm construction. No as-generated waste were applied to the Treatment CAMU Cells. Remaining Active Cells A-1 through A-11 will continue to operate under Delay of Closure status to treat non-hazardous biosolids as currently authorized.

As specified in Permit No. HW-50183-001, the principal hazardous constituents (PHCs) which characterize the applied wastes are:

- ▶ Organics:
 - Benzene;

- Toluene; and
- Naphthalene.
- ▶ Metals:
 - Chromium (from historical use within the refinery);
 - Lead (from historical production of leaded products); and
 - Nickel.

1.3.2 Characterization of Material in the NGL Processing Facility Construction Area Cells

In October 2015, in accordance with the LTF Closure Plan requirements, Blanchard completed Tier III (Skinner's List) sampling of the treatment zone and soil beneath the treatment zone for cells within the tank farm area cells (results are in **Attachment 1**). Similar samples were collected within the Treatment CAMU and Staging Pile Cells in July 2023. Results of these samples are presented in **Attachment 4**.

The objectives of the soil boring program were to:

- Provide characterization of the residual material in the treatment zone to support a TRRP Standard B closure evaluation;
- Fulfill the sampling requirement in the currently approved closure plan for sampling of soil beneath the treatment zone; and
- Assess management options for material that will be excavated during Tank Farm and NGL Processing Facility construction.

The results of the soil boring samples are provided in **Attachment 4**. The conclusions of the soil sampling program are:

- The principal hazardous constituents (PHC) remaining in the treatment zone are primarily metals and heavy hydrocarbon compounds (polynuclear aromatic hydrocarbons or [PAHs]);
- There has not been a release to soil beneath the treatment zone;
- Constituent concentrations in the LTU treatment zone exceed critical protection concentration levels (PCLs) for the Total Soil Combined ($T^{ot}Soil_{Comb}$) pathway and the Soil to Groundwater Ingestion ($^{GW}Soil_{Ing}$) pathway.

The cells within the tank farm construction area were closed using a soil cover system described in **Section 1.4.3** of this closure plan; the cells within the NGL Processing Facility Construction Area and post-closure cell C-4 were similarly closed with a clay soil cover. The soil cover system functions as an engineering control meeting TRRP Remedy Standard B closure requirements and will effectively address the PCL exceedances.

1.3.3 Mobility and Migration Potential

An assessment of mobility and migration potential of the residual PHCs into environmental pathways of exposure is necessary in selecting an appropriate closure method. This section evaluates the mobility and migration potential through discussion of the recent results of soil boring samples of the treatment zone and underlying soil, and historical groundwater monitoring results.

The construction of the tank farm and the NGL Processing Facility includes the following features that will significantly reduce the infiltration and subsequent mobility of constituents remaining in the closed cells

beneath the Tank Farm and NGL Processing Facility, as further discussed in Section 1.4.1 of the Closure Plan:

- Soil conditioning/compaction of upper 12 inches of cells (will not be used in the NGL Processing Facility construction because of the use of pilings for structural support)
- Placement of 12 inch layer of compacted clay over the cells
- Placement of additional structural fill soil over the cells
- Placement of a Geosynthetic Clay Layer (GCL) over the floor of the tank farm and pump manifold area with additional soil fill over the GCL; GCL will not be used in the NGL Processing Facility construction;
- Construction of the tanks and gas processing equipment over a portion of the cells

Degradation of Organics

Factors affecting the degradation of organics in a land treatment facility include aeration and oxygen supply, temperature, soil pH, and nutrients. The LTF has been operated under Delay of Closure for more than 10 years accepting primarily non-hazardous biosolids, which amend the soil and enhance biodegradation in the LTF cells.

Soil microorganisms require oxygen for oxidation of carbonaceous materials and nitrification of nitrogen in the form of ammonia. Oxygen diffusion rates vary with soil texture and structure (macropore space), soil moisture, and hydraulic loading rates. Generally, any soil property or management practice which encourages soil aeration (such as tillage) will increase the biological decomposition capacity of the soil. Therefore, the discing action performed in Remaining Active Cells during continued in-situ treatment at the LTF would greatly enhance the diffusion of oxygen into the soil and, thus, produce an environment conducive to aerobic biodegradation.

While different types of soil microorganisms have different pH optima for maximum activity, the optimum pH range for rapid decomposition of wastes and residues is 6 to 9 (Alves et al., 1987). The soil pH for Remaining Active Cells of the LTF will be maintained within this range in order to maximize degradation, thereby reducing the potential for migration of organic constituents.

Immobilization of Metals

In a land treatment facility, metals are attenuated in the upper soils, thereby achieving the objective of immobilization. Several authors have examined the mechanisms of metal retention in soil (Chaney, et al., 1981; Brown and Associates, 1983; Fuller, 1980; and CAST, 1980). The mechanisms of retention include specific adsorption, cation exchange, substitution in the clay structure, precipitation and co-precipitation. Since the majority of the wastes historically treated at the LTF (e.g., filter cake) were treated with lime, the metals are in hydroxide form and, therefore, precipitate in the upper soils. Metal accumulation, to a great extent, is not of environmental concern since Blanchard does not plan to grow food-chain crops at the LTF.

Soil pH is the parameter most consistently identified in the literature as controlling metal solubility. Chaney (1973) suggested that soil pH may be more important than the amount of metal added. With the exception of molybdenum and selenium (which are not of concern at the LTF), all other metals are more soluble at low pH. Lower pH also decreases the adsorption of metals to pH-dependent adsorption sites on mineral surfaces (H^+ is a competitive cation) and lowers the cation exchange capacity of soil organic matter. Soil pH conditions for the cells will be monitored and amended, if necessary, to avoid low pH conditions, thereby enhancing the immobilization of metals.

Groundwater

In addition to the soil boring data, data from the LTF groundwater monitoring program provides evidence that the PHCs in the treatment zone are immobilized and have not migrated beneath the treatment zone into shallow groundwater.

1.4 Closure Activities

1.4.1 Objectives

The activities described in this closure plan are intended to ensure that final closure of the LTF is conducted in a manner which:

- Minimizes the need for further maintenance; and
- Controls, minimizes or eliminates, to the extent necessary to protect human health and the environment, post-closure escape of hazardous waste, hazardous constituents, leachate, contaminated run-off, or hazardous waste decomposition products to the ground or surface waters or to the atmosphere.

The primary performance objective of the soil cover system in the NGL Processing Facility Construction Area Cells (includes Treatment CAMU cells, Staging Pile cells, and tank farm cells) will be to prevent surface exposure to the LTF waste material beneath the cover. The cover system will also minimize rainfall infiltration through the LTF waste material. Additionally, based on the conclusions of historic groundwater sampling and the soil boring samples discussed below, risk of downward migration of constituents from the LTF is minimal.

Conclusions from the historical groundwater detection monitoring program are:

- The LTF remains in detection monitoring mode since 1986;
- The LTF has a network of 40 point of compliance (POC) wells and;
- There have been no repeated statistically significant increases (SSI) that have occurred, and no detections above groundwater protection standards.

Conclusions of the October 2015 and July 2023 (see Attachments 1 and 4) soil boring sampling programs are:

- There has not been a release to soil beneath the treatment zone (TZ);
- Soil within the TZ contained exceedances of critical $^{Tot}Soil_{Comb}$ PCLs. The proposed remedy for these exceedances is a compacted clay cover over the closed cells;
- Soil within the TZ contained exceedances of critical $^{GW}Soil_{Ing}$ PCLs. However, there were no PCL exceedances in soil beneath the TZ; and
- The hazardous constituents remaining in the treatment zone soils are of low mobility, primarily metals and heavy hydrocarbon compounds (polynuclear aromatic hydrocarbons or PAHs), such that migration of these constituents is unlikely to occur.

Based on the soil boring and historical groundwater data, the soil-to-groundwater pathway is not complete and a remedy for the $^{GW}Soil_{Ing}$ pathway is not required (in accordance with 30 TAC 350.75 (h)(i)(7)(C)). However, the proposed soil cover system remedy for the $^{Tot}Soil_{Comb}$ pathway will minimize infiltration of storm water through the treatment zone and lower the risk of migration of constituents through the soil-to-groundwater pathway. The soil cover system specification and performance evaluation are discussed below.

The cover system for the NGL Processing Facility Construction Area Cells is a minimum 12 inches of compacted clay placed over the treatment zone soils, as shown in Figures CP-3a through CP-3c. The 12-inch clay cover soil will meet source material and construction specifications shown in Table 6. The source material specifications in Table 6 and associated compaction criteria will result in a significantly less permeable surface than the existing LTF surface and will minimize infiltration through the treatment zone soils.

The cover previously placed in the Tank Farm Area and the Pump Manifold Area included a Geosynthetic Clay Liner (GCL) placed over the 12-inch compacted clay layer. The GCL was attached to the inner and outer tank foundation and cover the Tank Farm and Pump Manifold Areas (see Figures CP-2 and CP-4 in Attachment 3 for reference). The metal tank shell and roof constructed over the tank foundation will complete the cover system in the Tank Farm Area. The composite clay and GCL cover system will result in a significantly less permeable surface than the existing LTF surface and will minimize infiltration through the treatment zone soils. GCL will not be used in construction of the NGL Processing Facility.

To achieve grading and drainage required for tank farm construction, additional engineered fill material was placed over the 12-inch clay layer in the Tank Farm Area. Also, a one-foot padding layer of soil was installed over the GCL, in accordance with the manufacturer's recommendations. Similar additional fill will be placed in the NGL Processing Facility Construction Area for grading and drainage. The engineered fill provides additional cover for preventing surface contact with and reducing infiltration through treatment zone soils.

Closure procedures are provided in this plan for cells in two areas:

- Closure for Remaining Active Cells
- Closure for the NGL Processing Facility Construction Area (closed with clay cap January 8, 2025 through July 22, 2025)

The cells identified for each of the areas above are shown below.

Proposed Cell Configuration

Cell Location	Current Cell Status	Proposed Cell Status
<p>NGL Processing Facility Construction Area (Frac1 and Frac2)</p> <p>Treatment CAMU Cells (CAMU II) C-1, C-2, C-3, B-2, B-3, B-4, D-5</p> <p>Staging Pile Cells B-1, D-6</p> <p>Tank Farm Area Cells B-5, B-6, D-1, D-2, D-7, D-8, D-3, D-4, B-7, D-9</p> <p>Cell C-4</p>	<p>Closed</p> <p>Closed</p> <p>Closed</p> <p>Post-closure</p>	<p>Closed in-place with clay cap January 8, 2025 through July 22, 2025</p> <p>Closed in-place with clay cap January 8, 2025 through July 22, 2025</p> <p>Closed In-Place (2016 Class 2 Permit Modification)</p> <p>Closed in-place with clay cap</p>
<p>Remaining Active Cells A-1 through A-11</p>	<p>Active permitted LTU</p>	<p>Continue to operate under Delay of Closure status to treat non-hazardous biosolids as currently authorized.</p>

Closure Methods for Cells in the NGL Processing Facility Construction Area (Frac1 and Frac2)

The NGL Processing Facility cells include the Treatment CAMU cells, the Tank Farm cells (closed in 2016), the Staging Pile Cells, and Post-Closure cell C-4. Specific methods for closure of each category of cell is provided in Sections 1.4.2 through 1.4.5 below. The unsaturated zone monitoring (soil pore liquid and soil cores) and groundwater monitoring methods are common to all categories of the gas processing area cells and are summarized directly below.

Groundwater Monitoring for the NGL Processing Facility Construction Area

Groundwater monitoring using the current groundwater monitoring system will be conducted during the closure and post-closure period for the NGL Processing Facility cells as required in current permit conditions.

In accordance with Permit No. HW-50183-001, detection monitoring will be conducted on a semiannual basis for the current list of monitoring parameters specified in the permit. Groundwater monitoring results will be compared to concentration limits currently specified in the permit. Groundwater monitoring will continue for a period of 30 years after the initiation of closure activities, or until groundwater monitoring is deemed no longer necessary in accordance with Permit No. HW-50183-001.

Soil Pore, Soil Core Monitoring for the NGL Processing Facility Construction Area

Blanchard conducted soil pore monitoring of the closed Tank Farm Area cells, the Treatment CAMU cells, and the Staging Pile cells for up to 90 days after the last application of biosolids in accordance with Permit No. HW-50183-001 and 40 CFR 264.280(a)(7). Soil Core monitoring was continued for the cells within the NGL Processing Facility Construction Area until the beginning of construction of the clay cap (January 2025). Soil Core monitoring is eliminated in these cells during post-closure care based on the results of historic groundwater and soil boring samples, which indicate the risk of downward migration of constituents from the LTF is minimal. Also, the cover system for these cells would be damaged by soil core sampling and decrease its effectiveness.

1.4.2 Closure Methods for Treatment CAMU Cells (C1, C2, C3, B2, B3, B4, D5)

Soil excavated during tank farm construction and temporarily stored in the Staging Pile Cells was placed in the Treatment CAMU Cells, as described in the Closure Certification Report in **Attachment 3**. Blanchard ceased application of biosolids applied to these cells and the cells will not receive further wastes. Therefore, upon applying the excavated soil from the Staging Pile Cells, the Treatment CAMU cells were in closure.

Closure of the Treatment CAMU Cells has been accomplished by: 1) in-situ treatment of the excavated soil; and 2) monitoring of soil, soil pore water, and groundwater. In-situ treatment consisted of continuing the operating and management practices utilized during the active life of the facility, including discing, and using additional soil amendments (i.e., pH, moisture, nutrient control) for enhancing degradation, transformation, or immobilization when necessary. By allowing for continued treatment of waste residues in the soil system, in-situ treatment reduces the potential for migration of hazardous constituents to the environment. Blanchard continued operating the cells after application of the excavated soil from the Staging Pile Cells for a minimum period of 2 years until the hazardous constituents met treatment standards described in Section 1.5. A Closure petition for the cells is included in Attachment 4.

Blanchard closed the Treatment CAMU cells in-place with a clay cap (see **Figures CP2a and CP3a through CP3f** for clay cap plan and cross sections, respectively). The clay cap and construction elements above the clay cap are described below.

- Soil conditioning of the subgrade beneath the clay cap in the Treatment CAMU cells was not used as it was in the Tank Farm Construction Area because the use of pilings will provide the needed structural support. Nominal compaction of the subgrade was performed prior to placement of the 12-inch clay cover.
- The Treatment CAMU cells were graded as needed to provide a level surface for placement of the clay cap.
- A 12-inch layer of compacted clay meeting the specifications in Table 6 was placed over the Treatment CAMU cells as indicated in Figures CP-3a through CP-3c. During construction of the clay cap, a protective layer of fill soil (approximately 2 feet thick) was placed over the clay cap to keep moisture in the clay and to provide a working surface for construction equipment.
- Pilings are then installed through the fill soil and clay cap in approximate locations shown in figures in Attachments GE-3 (Frac1) and GE-4 (Frac2) of the General Engineering Report.
- Figure CP-3a depicts an optional clay cap design (if needed), whereby the elevation of the equipment foundation is lower than local clay cap elevation (a 6-inch layer of granular bentonite would be used around the pilings in locations where the clay cap is lowered); Figure CP-3b depicts the clay cap elevation where the elevation of the equipment foundation is higher than local clay cap elevation (no bentonite added around piles); Figure CP-3c depicts the clay cap in areas without pilings.
- Additional engineered fill soil and concrete equipment foundations would be constructed around

and over the areas in which pilings are installed as shown in Figures CP-3a through CP-3c.

- Figure CP-3d depicts an optional clay cap design (if needed), whereby piping would be installed by lowering the clay cap where the elevation of the piping is lower than local clay cap elevation.
- Figures CP-3e and CP-3f show how equipment (such as cooling towers and pump casings) will be installed through the clay cap (with or without piles). In these locations, the contact between the clay cap and equipment casing will be sealed with other penetrations of the clay cap by bentonite pellets. The approximate location of the cooling tower and pump installations is shown on a drawing in Attachments GE-3 (Frac1) and GE-4 (Frac2) of the General Engineering Report

Soil Core monitoring was continued for the Treatment CAMU cells within the NGL Processing Facility Construction Area until the beginning of construction of the clay cap (January 2025). Closure of the CAMU II cells, Staging Pile Cells, and Cell C-4 associated with construction of the NGL Processing Facility will be considered complete when the additional engineered fill soil and concrete equipment foundations have been constructed around and over the areas in which pilings are installed. Blanchard will submit a closure certification report at that time.

During closure (and post-closure care), continued groundwater monitoring will provide a means for ensuring that the objective of controlling migration has been achieved.

Storm Water Control in Treatment CAMU Cells

Upon closure of the Treatment CAMU cells, storm water will be managed as described below, as further discussed in the General Engineering Report.

- The overall site Storm Sewer Drainage design/layout is shown in Attachments GE-3 (Frac1) and GE-4 (Frac2) of the General Engineering Report. For the 100-year, 24 hour design rain event, the storm water is sent to Storm Water Basins No. 1 & 2 through this storm sewer system.
- For shorter duration, higher-intensity storms than the 100-year, 24 hour design rain event, some water could accumulate around the catch basins but all the water will drain to Storm Water Basins No. 1 & 2 and discharge through the TPDES permitted outfall. Stormwater runoff is also contained within the NGL Processing Facility and will not overflow to the remaining active A cells. See drawings in Attachments GE-3 (Frac1) and GE-4 (Frac2) of the General Engineering Report for storm water system design calculations.

1.4.3 Closure Methods for Cells in the Tank Farm Area

Blanchard closed cells in the Tank Farm Area in 2016-2019 to allow a new tank farm to be constructed on the closed cells. The cells were closed in accordance with the LTF's Closure Plan. A copy of the Closure Certification Report for the Tank Farm Area Cells and the Staging Pile Cells is included as **Attachment 3**. The tank farm is further described in the General Engineering Report.

Closure activities in the Tank Farm Area Cells included:

- Addition of fill material for site grading and road base over the 12-inch compacted clay cover system installed during the partial closure stage;
- Installation of foundations for two tanks;
- Installation of two tanks;
- Construction of tank containment berms;
- Installation of a Geosynthetic Clay Liner (GCL) in the Tank Farm and Pump Manifold Areas; and
- Improvements to site storm water handling systems.

Closed cells outside of tank berms were covered with a compacted clay layer. Closed cells in the Tank Farm Area and Pump Manifold Area include both a compacted clay layer and Geosynthetic Clay Liner (GCL) cover system (see Figures CP-3 and CP-4 in Attachment 3 for reference, which show typical cross sections of the final cover system design for the Tank Farm Area). Key features of the cover system for the Tank Farm Area are provided below.

- MPL's standard tank farm design includes a GCL throughout the interior of the tank dike areas (inner walls and floor and beneath tanks), as well as the inner berms and floor areas of manifold and pump containment areas (located outside of tank dikes). The design includes the 12 inch compacted clay layer, additional engineered fill as needed, GCL, and 1 foot soil cover over the GCL (the lined areas of cells are shown in Figure CP-2 in Attachment 3 for reference). A manufacturer specification sheet for the GCL is provided in Attachment 2.
- Additional fill material was placed over the 12 inch compacted clay layer to complete the cover system for closure of the Tank Farm Area cells. The fill material included select fill and geogrid for additional strength in heavy construction areas.

Storm Water Control in Tank Farm Area Cells

Storm water from the Tank Farm Area will be managed by two methods: it will be collected with localized catch basins for areas outside the A cells and gravity fed to Storm Water Basins 1 & 2 or will be pumped from the A cells via Lift Station No. 1. Further discussion of storm water management is included in the General Engineering Report.

1.4.4 Closure for Temporary Staging Pile Cells

Two remaining active cells (B1 and D6) were converted to staging piles in 2016 to temporarily manage excavated soils from tank farm construction. The Staging Pile Cells were operated for a period of 2 years from the date that waste was placed in those cells. At the end of the authorized period for the Staging Piles, soil placed in the Staging Pile Cells was removed and placed in the Treatment CAMU II cells. A copy of the Closure Certification Report for the Tank Farm Area Cells and the Staging Pile Cells is included as **Attachment 3** that provides detail on the use and closure status of the Staging Pile Cells.

Blanchard closed the Staging Pile cells in-place with a clay cap (see **Figures CP2a and CP3a through CP3f** for clay cap plan and cross sections, respectively). Soil Core monitoring was continued for the Staging Pile cells within the NGL Processing Facility Construction Area until the beginning of construction of the clay cap (January 2025). During closure (and post-closure care), continued groundwater monitoring will provide a means for ensuring that the objective of controlling migration has been achieved.

Storm Water Control in Staging Pile Cells

Upon closure of the Staging Pile cells, storm water will be managed as described below, as further discussed in the General Engineering Report.

- The overall site Storm Sewer Drainage design/layout is shown in Attachments GE-3 (Frac1) and GE-4 (Frac2) of the General Engineering Report. For the 100-year, 24 hour design rain event, the storm water is sent to Storm Water Basins No. 1 & 2 through this storm sewer system.
- For shorter duration, higher-intensity storms than the 100-year, 24 hour design rain event, some water could accumulate around the catch basins but all the water will drain to Storm Water Basins No. 1 & 2 and discharge through the TPDES permitted outfall. Stormwater runoff is also contained within the NGL Processing Facility and will not overflow to the remaining active A cells.

See drawings in Attachments GE-3 (Frac1) and GE-4 (Frac2) of the General Engineering Report for storm water system design calculations.

1.4.5 Closure for Cell C-4

Closure activities for C-4 included (1) monitoring of soil, soil pore water and groundwater to verify that there was no migration of the constituents; (2) biodegradation of wastes via plowing and tilling; (3) limited phytoremediation of soils in the upper 12 to 18 inches; and (4) ongoing in-situ degradation of wastes. A post closure care petition for C-4 was submitted in September 2006 and subsequently approved by TCEQ. The surface of Cell C-4 has been vegetated and monitoring of soil cores and groundwater is performed.

Cell C-4 was covered with a compacted soil cover system to facilitate construction of the NGL Processing Facility.

1.4.6 Closure Methods for Remaining Active Cells (A1 through A11)

Closure of the Remaining Active Cells will be accomplished by: 1) in-situ treatment of the applied wastes; and 2) monitoring of soil, soil pore water, and groundwater. In-situ treatment consists of continuing the operating and management practices utilized during the active life of the facility, including discing and using additional soil amendments (i.e., pH, moisture, nutrient control) for enhancing degradation, transformation, or immobilization when necessary. By allowing for continued treatment of waste residues in the soil system, in-situ treatment reduces the potential for migration of hazardous constituents to the environment. Therefore, Blanchard will continue operating the cells until either the hazardous constituents have reached a concentration comparable to the background, or have stabilized to a level at which no further significant degradation is observed. When this is achieved, closure activities will be terminated and post-closure activities will begin. During closure (and post-closure care), continued groundwater monitoring will provide a means for ensuring that the objective of controlling migration has been achieved.

The steps that will be carried out during the closure process are outlined in the following sections.

Tilling

During the closure period, Blanchard will continue tilling cells in the Remaining Active Cell Area twelve times/yr. to maximize degradation, transformation, and immobilization of hazardous constituents within the treatment zone. Each discing event will include at least two passes with a disc harrow.

Soil pH, Moisture, and Nutrient Management

The management requirements for soil pH, soil moisture, and soil nutrients will be continued as required by Permit No. HW-50183-001, and the soil will be amended as necessary.

Storm Water Control for Remaining Active Cells

Blanchard will continue all operations in the Remaining Active Cell Area to minimize run off of hazardous constituents and to maintain the run-off and run-on control systems in accordance with the Permit No. HW-50183-001. Any precipitation run off from closed cells will continue to be drained into the stormwater collection system through moveable decanters located in the corner of the cells. Storm water from the Remaining Active Cells will continue to be managed through the existing decanter and lift station system and pumped to the storm basins. Further discussion of storm water management is included in the General Engineering Plan.

The decanters for the cells will remain in service for the duration of the closure period and part or all of

the post-closure care period to ensure that precipitation run off can continue to be removed for as long as the cells are a topographically distinct entity with internal drainage. If at some point in the future the decanters are no longer required to remove run off, Blanchard will remove and decontaminate the decanters so that they present no threat to human health or the environment in subsequent disposal or recycling.

Soil Pore Monitoring

Blanchard will conduct soil pore monitoring of the closed cells in the Remaining Active Cell Area for up to 90 days after the last application of biosludge in accordance with Permit No. HW-50183-001 and 40 CFR 264.280(a)(7). Concentrations of Tier I and II PHCs, as specified in the permit, will be determined for the lysimeter samples. Table 1 lists the analytical parameters, containers, preservation methods, holding times, and analytical procedures that will be used. Data assessment of unsaturated zone monitoring results will be conducted in accordance with that specified in the permit.

Soil-Core Monitoring

Blanchard will conduct soil-core monitoring of closed cells in the Remaining Active Cell Area in accordance with Permit No. HW-50183-001 and 40 CFR 264.280(a)(7). Table 2 specifies the number of soil cores to be collected during each sampling event, which will be performed semiannually. Soil-core samples will be collected from a depth of 6 in. below the treatment zone (60 to 66 in.) using appropriate sampling methods. Soil-core monitoring will be continued in accordance with Permit No. HW-50183-001. Soil-core monitoring will be continued for a length of time sufficient to demonstrate that the organic PHCs have degraded to or near background, or until the degradation of organics has effectively ceased, as determined by Blanchard and TCEQ. This will consist of a minimum of four consecutive soil sampling events. Soil samples for at least the first three semiannual events will be analyzed for Tiers I and II parameters. Samples collected for the last semiannual event before petitioning for post-closure will be analyzed for Tiers I and III parameters. Table 3 lists the analytical parameters, containers, preservation methods, holding times, and analytical procedures that will be used.

Groundwater Monitoring

In addition to the required soil pore and soil-core monitoring, groundwater monitoring will also be conducted during the closure period. The LTF groundwater monitoring system described in the Facility Geology Report (previously submitted) will be the system used to monitor closure. All detection monitoring wells will be sampled on a semiannual basis for the Tier II monitoring parameters specified in Permit No. HW-50183-001. Groundwater monitoring will continue for a period of 30 years after the initiation of closure activities, or until groundwater monitoring is deemed no longer necessary.

The water purged during the sampling of monitor wells at the LTF will be placed onto active cells. In the event that all cells of the LTF are closed, purged groundwater will be placed in appropriate containers. After completion of the characterization, the disposition of the purge water will be assessed. Wells with detections of high metals or PHCs (if any) will be properly labeled for off-site treatment, storage, disposal, or recycling. Purge water from monitor wells deemed to be "clean" will be placed onto individual cells adjacent to the wells.

1.4.7 Closure Methods for OWC and MCD ditches

Closure activities for the two ditches Old Wah Chang (OWC) and Main Collection Ditch (MCD) included excavation of contaminated material from ditches, backfill with project-approved fill material, deed recordation, and inclusion of the ditches within the groundwater monitoring network surrounding the LTF. The three constituents left in place above Texas Risk Reduction Standard #2 media specific concentrations (chromium, nickel and lead) are parameters in the groundwater monitoring program.

Excavation and backfill activities associated with OWC and MCD ditches are presented in **Section 5**. A more detailed description of excavation/backfill activities is available in the *CMI Report and Certification of Excavation and Backfilling for Ditch Closure*, Radian, January 1995.

1.5 Termination of Closure Activities

Treatment CAMU Cells (C1, C2, C3, B2, B3, B4, and D5)

After a minimum period of two years from the initiation of closure activities Blanchard submitted to TCEQ a petition to discontinue closure activities and commence post-closure activities (included in Attachment 4).

The petition included the laboratory results from at least four semiannual soil-core sampling events conducted during the minimum two years of closure activities. Analytical results included Tiers I and II analyses for the first three semiannual sampling events, and Tiers I and III analyses for the fourth semiannual sampling event. The petition demonstrated that the organic PHCs have concentration levels at or near background, or that the degradation of organic PHCs has effectively ceased.

In addition to the soil-core sampling events described above, during the fourth semi-annual sampling event during closure, Blanchard sampled the soil within the ZOI of Treatment CAMU Cells that have received excavated soil from tank farm construction to demonstrate that the CAMU treatment standards specified at 40 CFR 264.552 (e)(4) have been met. These treatment standards require that concentrations of PHCs in soil be reduced ninety percent unless such treatment would result in concentrations that are less than ten (10) times the relevant Universal Treatment Standard (UTS, i.e. capped by 10x UTS). Blanchard used the ZOI sampling procedures specified in Section V.6 (a) of the current permit (i.e. collect a composite soil sample from the ZOI from 5 random locations within the cell). The samples were analyzed for the recommended PHCs below and test results were compared to the associated treatment standard.

PHC	10X UTS (mg/kg)
Benzo-a-anthracene	34
Phenanthrene	56
Chrysene	34
Anthracene*	34
Napthalene*	56

*Current PHCs for soil-core and soil pore liquid sampling

Upon completion of construction of the NGL Processing Facility, Blanchard will submit to TCEQ, certification by both Blanchard and an independent registered professional engineer or an independent qualified soil scientist that closure was conducted in accordance with the requirements of Permit No. HW-50183-001. The certification shall be submitted as part of the closure report, which shall include a summary of all closure activities.

Staging Pile Cells (B1 and D6)

After a minimum period of two years from the initiation of closure activities Blanchard submitted to TCEQ a petition to discontinue closure activities and commence post-closure activities (included in Attachment 4).

The petition included the laboratory results from at least four semiannual soil-core sampling events

conducted during the minimum two years of closure activities. Analytical results included Tiers I and II analyses for the first three semiannual sampling events, and Tiers I and III analyses for the fourth semiannual sampling event. The petition demonstrated that the organic PHCs have concentration levels at or near background, or that the degradation of organic PHCs has effectively ceased.

Upon completion of construction of the NGL Processing Facility, Blanchard will submit to TCEQ, certification by both Blanchard and an independent registered professional engineer or an independent qualified soil scientist that closure was conducted in accordance with the requirements of Permit No. HW-50183-001. The certification shall be submitted as part of the closure report, which shall include a summary of all closure activities.

Tank Farm Area Cells

Closure activities for the cells within the Tank Farm Area have been completed. A copy of the Closure Certification Report for the Tank Farm Area Cells is included as **Attachment 3**. The closure of the Tank Farm Area Cells was completed in two stages: Site Preparation/Partial Closure and Final Cover System Installation.

Remaining Active Cells (A1 through A11)

After a minimum period of two years from the initiation of closure activities, or when data indicate that degradation processes have ceased, Blanchard will submit to TCEQ a petition to discontinue closure activities and commence post-closure activities.

The petition will include the laboratory results from at least four semiannual soil-core sampling events conducted during the minimum two years of closure activities. Analytical results will include Tiers I and II analyses for the first three semiannual sampling events, and Tiers I and III analyses for the fourth semiannual sampling event. The results of any required soil pore monitoring conducted during the initiation of closure activities through the closure petition submittal will be included. The petition shall demonstrate that the organic PHCs have concentration levels at or near background, or that the degradation of organic PHCs has effectively ceased.

Within 60 days of TCEQ's approval of the closure petition, Blanchard will submit to TCEQ, certification by both Blanchard and an independent registered professional engineer or an independent qualified soil scientist that closure was conducted in accordance with the requirements of Permit No. HW-50183-001. The certification shall be submitted as part of the closure report, which shall include a summary of all closure activities.

TRRP Closure of Remaining Active Cells

If Blanchard determines during closure that closure objectives have not been met, Blanchard may request approval of alternate treatment standards, as discussed in the General Engineering Report, or Blanchard may choose to close the Remaining Active cells following the TRRP Remedy Standard B process as for the Tank Farm Area Cells (i.e. collecting Tier III soil boring samples within the treatment zone and installing a soil cover system, if necessary). Blanchard may also choose to follow a TRRP Remedy Standard B closure process for operational simplicity during post-closure, or if additional tank construction is planned in the LTF. Blanchard will submit a report assessing the results of soil boring samples and the proposed TRRP remedy, if a remedy is necessary, for TCEQ approval prior to implementing such a closure process. After implementing such a closure, Blanchard would submit a closure certification report for TCEQ approval.

2.0 Closure Costs

Cost estimates for closure of the LTF have been developed in accordance with 40 CFR 264.142 and 30 TAC 335.152. **Table 4** presents an updated estimate (2024 dollars) of the overall LTF closure cost for the Remaining Active Cells. Costs for closure of Treatment CAMU II Cells and Staging Pile Cells have been incurred during Frac1 construction activities (January through July 2025) and have been removed from closure cost estimates in **Table 4**.

3.0 Post-Closure Care Plan

3.1 Purpose

Post-closure care of the LTF will focus on:

- ▶ Minimizing maintenance requirements;
- ▶ Maintaining a vegetative cover or soil cover that will effectively stabilize the soil surface, control wind dispersal of dust, and prevent water and windborne erosion and run off;
- ▶ Addressing compliance with 40 CFR 264.276 concerning the growth of food-chain crops; and
- ▶ Restricting access to the LTF.

The contact person for post-closure care activities at the LTF is:

Todd Palmer
Environmental Supervisor, Waste and Water
Galveston Bay Refinery
2401 Fifth Avenue South Texas City, Texas 77590
409-943-7248
[REDACTED]

3.2 Post-Closure Care Activities –Remaining Active Cells

Soil-Core Monitoring

Blanchard proposes to monitor the subtreatment zone of the Remaining Active Cells on a semiannual basis for the initial three years of post-closure care. After completing the initial three years of post-closure care, Blanchard will request TCEQ approval to reduce the soil core monitoring frequency to an annual basis commencing on the fourth year of post-closure care and continuing for 30 yrs. after the date of completing closure.

During post-closure care Blanchard will continue soil-core monitoring for a duration of 30 years or until such time that levels of hazardous constituents in the treatment zone soil does not exceed the background value of those constituents. If at any time during post-closure activities soil samples show that migration/degradation of hazardous constituents have ceased, then Blanchard will petition to cease soil-core monitoring. All soil-core samples will be analyzed for Tier I and II parameters as listed in **Table 1** of the closure plan.

Groundwater Monitoring

Blanchard will continue to monitor groundwater (specified in Permit No. HW-50183-001) for 30 years after the initiation of closure activities. In accordance with 40 CFR 264.117(a)(2), the post-closure care period may either be extended or shortened with prior approval from the TCEQ. Blanchard will request approval to reduce the post-closure groundwater monitoring period if a reduced period is sufficient to protect human health and the environment (e.g., ground-water monitoring results, characteristics of the hazardous wastes, application of advanced technology, or alternative disposal, treatment, or re-use techniques indicate that the hazardous waste management unit is secure)

The Post Closure Care groundwater monitoring network will encompass the RFI ditches (OWC and MCD) and also satisfies post-closure care requirements for these closed Solid Waste Management Units. The three constituents left in place above Texas Risk Reduction Standard #2 media specific

concentrations (chromium, nickel and lead) are parameters in the groundwater monitoring program.

Visual Inspection and Maintenance Program

This program is more intense in the first year of post-closure care while Blanchard attempts to develop a stable vegetative cover for subsequent years.

First-Year Inspection/Maintenance Program

Blanchard will seed the post-closure Remaining Active Cells with a native grass mixture which is recommended by the local U.S. Soil Conservation Service. Soil amendments and topsoil will be added as necessary. River silt from the refinery Silt Ponds adjacent to the Storm Basins may be used for topsoil. The following will be checked and maintained on a monthly basis during the first year of post-closure care:

- ▶ Stressed vegetation or bare spots will be covered with top soil and vegetative cover will be reestablished;
- ▶ Burrow holes will be filled and seeded;
- ▶ Settled or eroded areas will be filled and seeded;
- ▶ As needed, grass will be mowed and clippings appropriately disposed;
- ▶ The status of the warning signs which are currently posted on the fence at each entrance to the LTF will be checked;
- ▶ Any incidental growth of shrubbery that may damage the integrity of the grass covering will be removed; and
- ▶ The need for watering will be monitored. If unusually dry conditions are present and watering is necessary, water from the silt basins (Brazos River water) will be used to water the cells.

The following will be checked on a quarterly basis:

- ▶ Soil will be tested for pH and nutrients and amended as needed.

Inspection/Maintenance Program for Second and Subsequent Years - Remaining Active Cells

The following items will be monitored throughout the maintenance program for the second and subsequent years of post-closure care:

- ▶ Quarterly and after major storms (i.e., 10-in./24-hr., 25-yr. frequency or more), inspection for bare spots, settled and eroded areas, and burrow holes. As needed, these areas will be filled and seeded;
- ▶ Fall and spring testing of soil and addition of soil amendments as needed;
- ▶ Mowing of grass and removal of any incidental growth of shrubs; and
- ▶ The status of the warning signs which are currently posted on the fence at each entrance to the LTF.

Blanchard believes that there will generally be little need for irrigation or watering of post-closure cells to control dust after the first year of post-closure care. Blanchard will check for watering requirements should there be a period of extended drought (i.e., no rainfall for a two-month period) and take appropriate actions to water the site to maintain a good vegetative cover.

3.3 Post-Closure Care Activities – NGL Processing Facility Construction Area Cells

Groundwater Monitoring

Blanchard will continue to monitor groundwater (specified in Permit No. HW-50183-001) for 30 years after the initiation of closure activities, or until groundwater monitoring is deemed no longer necessary.

The Post Closure Care groundwater monitoring network will encompass the RFI ditches (OWC and MCD) and also satisfies post-closure care requirements for these closed Solid Waste Management Units. The three constituents left in place above Texas Risk Reduction Standard #2 media specific concentrations (chromium, nickel and lead) are parameters in the groundwater monitoring program.

Visual Inspection and Maintenance Program

The soil cover system for the closed cells in the NGL Processing Facility construction area (Frac1 and Frac2) will be inspected quarterly for the following items:

- Signs of erosion or deep soil cracking that exposes landfarm waste;
- Rutting from vehicle traffic;
- Storm water management features; and
- Warning signs posted at the entrance gates.

Repairs will be made promptly as needed following inspections. Placement, grading and compaction of additional fill are typical repairs anticipated. Inspection records and records of repairs will be kept in facility files.

If repairs to tank farm components require excavation beneath the soil cover system, Blanchard will require properly RCRA/OSHA trained workers perform the work; all such work will include procedures for repair of the soil cover system.

3.4 Growth of Food-Chain Crops

Blanchard does not plan to plant or grow any crops or grass which may be used for animal feed or human consumption. In addition, access to the LTF is controlled by a fence installed around the LTF. Maintenance of access controls will continue for as long as necessary, but not longer than 30 yrs. past the closure date of the LTF.

3.5 Run-off Management

Blanchard will use the LTF perimeter dike for post-closure run-off management. Blanchard will grade the cells so that all run off will drain to a storm water collection system for direct disposal via permitted TPDES outfall. Further discussion of the stormwater management system is included in the General Engineering Report.

4.0 Post-Closure Care Costs

Cost estimates for post-closure care of the LTF have been developed in accordance with 40 CFR 264.144 and 30 TAC 335.152. **Table 5** presents an updated estimate (2024 dollars) of the overall LTF post-closure care cost.

5.0 Closure Documentation of OWC and MCD

This section is presented in response to comments from the TCEQ Corrective Action Team in a letter dated May 14, 1998, requesting inclusion of additional information on the closure of the RFI ditches in the LTF permit application *Closure and Post Closure Care Plans*. The May 14, 1998, letter specifically requested the following information:

- Identification of the OWC and MCD as RFI Unit No.'s 1 and 2;
- The location of the OWC and MCD and the boundaries of the Standard 3 closure of the Units (in the text and on appropriate maps), including the constituent levels left in place;
- A written description of the activities associated with the RFI, excavation and backfilling performed at the Units;
- Inclusion of the Units in conjunction with the LTF closure activities; and
- Any additional information for the RFI Units determined to be appropriate for future closure, construction or property transfer issues which may occur at the site.

5.1 Background

The Old Wah Chang (OWC) and Main Collection Ditch (MCD) were previously used for management of precipitation runoff at Blanchard's Land Treatment Facility (LTF).

Figure CP-1a presents a plan view of the Blanchard LTF including the locations of the OWC and MCD.

The original September 1987 hazardous waste permit no. HW-50183-001 required conducting an RFI on the OWC and MCD. The RFI consisted of Phase I, Phase IIa, Phase IIb and Phase III RFIs. Submitted with the Phase IIa RFI report was a plan for closure of the downstream sections of the ditches. This plan was approved by the TCEQ in a November 28, 1990, letter. The T-head formed by the downstream portions of the OWC and MCD was then backfilled and a perimeter dike constructed over portions of the MCD. The ditch adjacent to cell A11 was also closed based on results presented in Phase IIa RFI report.

TCEQ granted approval in a letter dated March 3, 1994, of the Phase III RFI Report (with addendum) for the remaining open portions of the OWC and MCD and requested a CMI workplan for a Texas Risk Reduction Standard #3 closure of the open portions of the ditches. The letter also requested that the Standard #3 work plan include provisions for removal of "hotspots" within the ditches and then backfilling of both ditches. Remaining open portions of the OWC and MCD were closed based on Standard 3 closure (activities initiated July 18, 1994). Further detail of MCD closure activities is presented in the *CMI Report and Certification of Excavation and Backfilling for Ditch Closure*, Radian (January 1995).

The CMI Workplan was submitted in May 1994 and identified former "hotspots" in subsurface soils prior to excavation and presents analytical results for soil samples collected during Phase I, Phase IIa, and Phase IIb activities. There were no "hotspots" identified based on analytical data for metals in the MCD, therefore, no soil was removed from MCD. The constituent levels left in place in the ditches are presented in the analytical results tables in the *CMI Workplan* (May 1994).

5.2 Description of Excavation and Backfill of the Units

The *CMI Report and Certification of Excavation and Backfilling for Ditch Closure*, Radian (January 1995) describes in detail the sedimentation and vegetation removal, excavation, and backfill procedures for the OWC and MCD that were conducted from July through October 1994. The excavated material was

placed upon selected plots with the LTF and treated in the same manner as other applied waste streams. Quality assurance/quality control procedures were used to ensure that the backfill material met material property requirements given in the CMI workplan. The collected QA/QC data is presented in the CMI Report. Upon completion of the backfill, the 14 foot perimeter dike was constructed over a portion of the backfilled MCD. The position of the dike was such that the inside toe of the perimeter dike was located approximately over the centerline of the former ditch with the dike and ditch running parallel directions.

5.3 Inclusion of the Units in LTF Closure Activities

The OWC and MCD will be included in the closure and post-closure care activities by inclusion in the groundwater monitoring program for the LTF.

TABLES

Table 1. Soil-Pore Water Sampling and Analytical Protocol

Parameter	Container	Preservation	Maximum Holding Time	Analytical Procedure ¹
TIER I				
TOC	100 ml glass	Cool 4 C H ₂ SO ₄ to pH<2	28 days	SM 5310B or 9060A
pH			In field	150.1
TIER II				
Metals: Antimony Chromium Lead Nickel Selenium	200 ml polyethylene	Cool 4 C HNO ₃ to pH <2	6 months	6020A
Volatiles: Benzene Toluene Naphthalene	2 40 ml VOA w/Teflon-lined septum	Cool 4 C	14 days	8260B
Basic Neutrals: Naphthalene Anthracene	2 1L Amber glass bottles w/Teflon-lined cap	Cool 4 C	7 days extraction 40 days analysis	8270D
Acid Extractables: Phenol	2 1L Amber glass bottles w/Teflon-lined cap	Cool 4 C	7 days extraction 40 days analysis	8270D

¹ Listed method or most recent approved, audited method will be used

Table 2. Soil-Core Samples for Closure Monitoring ¹

Number of Soil Cores Collected Per Cell	Cell
2	A1 - A10
3	A11

¹ Soil cores collected on a semiannual basis.

**Table 3. Soil-Core Samples
Sampling and Analytical Protocol**

Parameter	Container	Preservation	Holding Time	Analytical Procedure ¹
TIER I				
TOC	8 oz. widemouth glass w/Teflon liners	Cool 4 C	28 days	Walkley-Black SSA/ASA 3:34
pH		Cool 4 C	In field	SW9045D
TIER II				
Metals: Antimony Chromium Lead Nickel Selenium	8 oz. widemouth glass w/Teflon liner (same container used for base neutrals)	Cool 4 C	6 months	6020A
Volatiles: Benzene Toluene Naphthalene	4 oz. widemouth glass w/Teflon-lined septum	Cool 4 C	14 days	8260B
Semivolatiles: Anthracene Naphthalene Phenol	8 oz. widemouth glass w/Teflon liners	Cool 4 C	7 days extraction 40 days analysis	8270D
TIER III²				
Modified Skinner	8 oz. widemouth (same container used for base neutrals)	Cool 4 C	6 months; 28 days for Hg	
Metals: Sb, Ba, Be, Cd, Cr Co, Ni, V, As, Pb, Hg, Se	8 oz. widemouth glass w/Teflon liner			6020A 7471 (Hg)
Modified Skinner Volatiles	4 oz. lined septum widemouth glass	Cool 4 C	14 days	8260B
Modified Skinner Semivolatiles:	8 oz. widemouth glass w/Teflon liners	Cool 4 C	7 days extraction 40 days analysis	8270D

Note:

As=Arsenic
Hg=Mercury
Ni=Nickel

Pb=Lead
Cd=Cadmium
Cr=Chromium

Be=Beryllium
Co=Cobalt
Se=Selenium

Sb=Antimony
V=Vanadium
Ba=Barium

¹ Listed method or most recent approved, audited method will be used

² Tier III analyses will be performed on soil-core samples when remaining active cells are closed.

Table 4. LTF Closure Cost Estimate¹

Item	Closure Costs (2019 dollars)
Decontaminate / Remove Sludge Pipeline (9600 lf of 4"-6" pipe)	\$220,000
Semi-annual sampling (2 years soil, groundwater, ZOI, misc)	\$380,000
Analysis of samples (2 years - soil, groundwater, ZOI, misc)	\$200,000
Grading, tilling, mowing, storm water mgt, routine O&M (2 years)	\$800,000
Vegetative Cover ("A" cells, CAMU II cells, Staging Pile Cells)	\$247,500
Survey	\$15,000
Closure Certification Negotiations / Report	\$100,000
Legal/Consulting (data management, annual reporting)	\$220,000
TOTAL 2019 COST ESTIMATE	\$2,180,000

¹ Assumes 2 year closure period

Adjusted Cost for inflation to 2024 dollars

Year	Inflation Factor	Adjusted Closure Cost
2020	0.012	\$2,210,000
2021	0.042	\$2,300,000
2022	0.07	\$2,460,000
2023	0.036	\$2,600,000
2024	0.024	\$2,700,000

Table 5. LTF Post-Closure Care Cost Estimate

Item		Post-Closure Costs (2019 dollars)
Sampling and Analysis	Groundwater Sampling	\$940,000
	Groundwater Analysis	\$660,000
	Unsaturated Zone Sampling	\$880,000
	Unsaturated Zone Analysis	\$520,000
	Miscellaneous Sampling	\$70,000
	Miscellaneous Analysis	\$300,000
Reporting/Consulting		\$2,100,000
Inspections/O&M (seeding, watering, mowing, fertilizer, erosion control)		\$6,330,000
Subtotal		\$11,800,000
Contingency (20%)		\$2,360,000
TOTAL 30 year COST ESTIMATE (2019)		\$14,200,000

Notes:

Groundwater sampled semi-annually for 5 years, annually for years 6-30.

Soil cores sampled semi-annual first 3 years, annually for years 4-30.

Annual reporting

Adjusted Cost for inflation to 2024 dollars

Year	Inflation Factor	Adjusted Closure Cost
2020	0.012	\$14,370,000
2021	0.042	\$14,970,000
2022	0.07	\$16,020,000
2023	0.036	\$16,600,000
2024	0.024	\$17,000,000

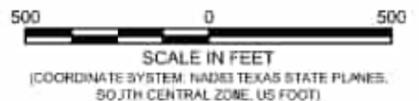
Table 6
Soil Cover System Specifications
Construction Area Cells

Quality Control Testing Summary			
Quality Control Parameter	Quality Control Testing Method	Design Requirement	Minimum Testing Frequency
Source Material for Clay Cover System			
Plasticity Index (PI)	ASTM D4318	20 – 35 (CL or CH)	One per soil type or one per borrow source; test results submitted to Engineer for approval prior to procurement
Liquid Limit (LL)	ASTM D4318	30 – 55 (CL or CH)	
Sieve analysis	ASTM D422 and ASTM D1140	70-90% fines passing No. 200 sieve minimum	
Standard Proctor Moisture-Density Relationship	ASTM D698	Establish standard Proctor curve and optimum moisture	
Moisture content	ASTM D2216 (lab moisture)		
Permeability	ASTM D-5084 (remolded sample)	10 ⁻⁷ cm/s or less	
Installation of Clay Cover System			
In-place Moisture Content	ASTM D3017 (nuclear gauge) or ASTM D2216 (oven)	Minimum 95 % of maximum Dry Density, at or above optimum moisture content, <8-inch lifts, max/min particle size prior to completion, 1.5 in.	One per 5,000 square feet per lift; no less than five per lift
In-place Density	ASTM D2922 (nuclear density gauge)		

1. Contractor will supply, place and compact a 12-in (minimum) clay fill layer meeting material and installation quality control criteria in table above.
2. The clay fill layer shall achieve a continuous cover over Construction Area Cells and internal roads/dikes within Construction Area Cells. Roads/dikes along perimeter of Construction Area Cells to remain.
3. Do not conduct placement operations during inclement weather. Contractor may manipulate wet material to facilitate drying, by discing or windrowing or by other suitable means.

FIGURES

FILE: \\nae\acornad\com\blanchard\Houston\GIS\HOU\DCSP\gis\ENR\001\03001_GBR_LTF_Frac2_PlanView\CP-1A - Plan View Blanchard LTF_Frac2.dwg - SAVED Tuesday, November 25, 2025 4:21:12 PM



SOURCE: IMAGES PROVIDED BY H-GAC (HOUSTON-GALVESTON AREA COUNCIL) AND H-GAC DATA SERVICES GIS DEPT. IMAGES DATED FALL OF 2012.

LEGEND:

-  BLANCHARD LTF BOUNDARY (196 acres)
-  TANK FARM CONSTRUCTION AREA

-  NGL PROCESSING FACILITY CONSTRUCTION AREA (Frac1 and Frac2 Construction Areas. See Attachments GE-3 and GE-4 of the General Engineering Report for construction details of Frac1 and Frac2)

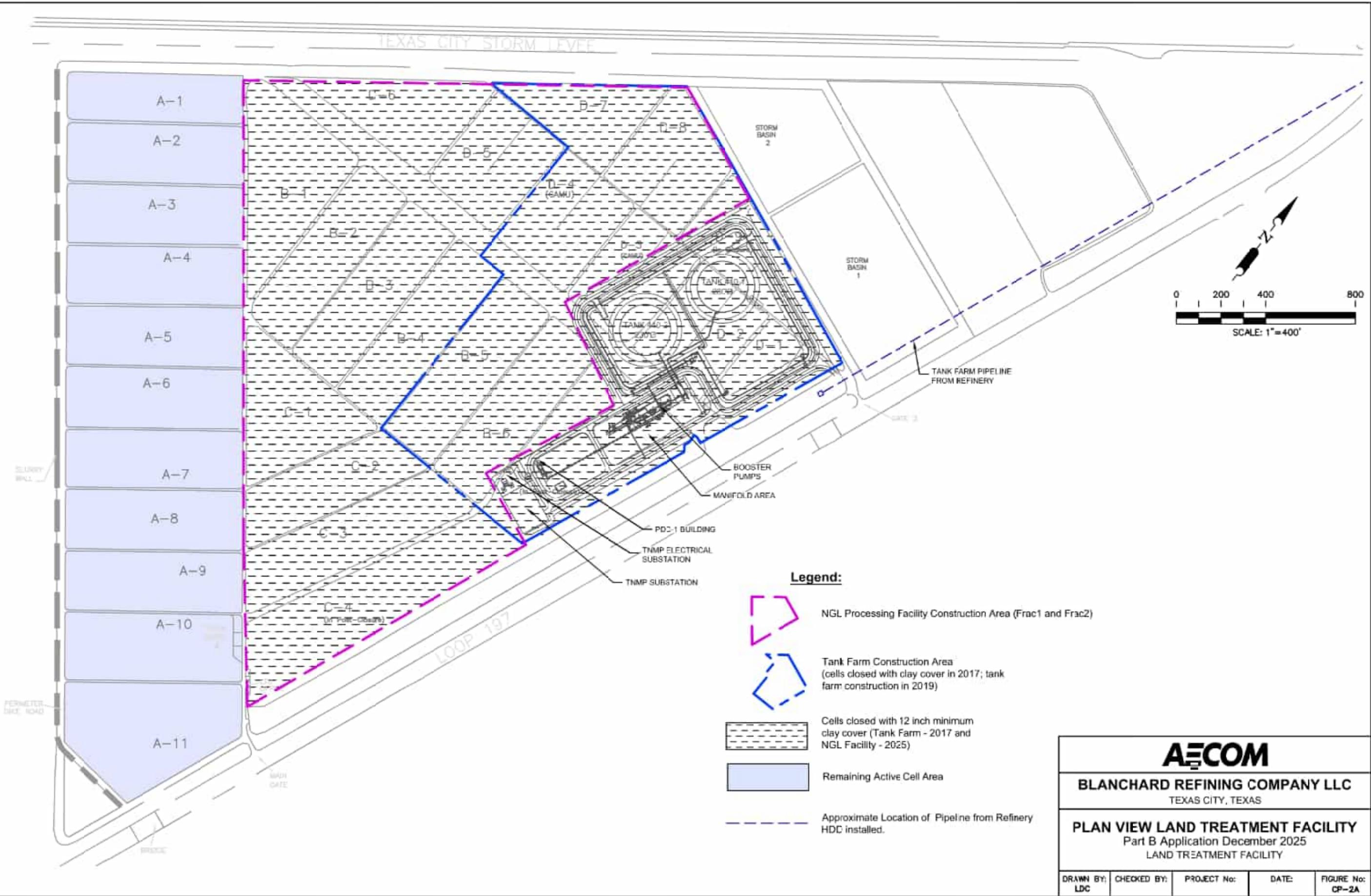
AECOM
 19219 KATY FREEWAY, SUITE 100
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Title: **PLAN VIEW BLANCHARD LTF**
 Project: PART B APPLICATION - DECEMBER 2025 RCRA PERMIT HW-50183 TEXAS CITY, GALVESTON COUNTY, TEXAS

Scale: AS NOTED
 Drawn by: NAE/KPL
 Chk'd by: MG

Client: **BLANCHARD REFINING COMPANY, LLC**
 Project No.:
 File Name: PIB-CP-1A - Plan View Blanchard LTF_Frac2.dwg
 Figure: CP-1A

FILE: \\na.aecom.com\AMER\Houma-US\HDC\Projects\ENV\90703000_CBR_L17_Frac2_Permit500_CAD_018116_CAD\PS-CP-2A_Plan View Land Treat_Frac2.dwg : PLOTTED: Friday, December 5, 2025 3:46:18 PM



Legend:

-  NGL Processing Facility Construction Area (Frac1 and Frac2)
-  Tank Farm Construction Area (cells closed with clay cover in 2017; tank farm construction in 2019)
-  Cells closed with 12 inch minimum clay cover (Tank Farm - 2017 and NGL Facility - 2025)
-  Remaining Active Cell Area
-  Approximate Location of Pipeline from Refinery HDC installed.

AECOM				
BLANCHARD REFINING COMPANY LLC TEXAS CITY, TEXAS				
PLAN VIEW LAND TREATMENT FACILITY Part B Application December 2025 LAND TREATMENT FACILITY				
DRAWN BY: LDC	CHECKED BY:	PROJECT No:	DATE:	FIGURE No: CP-2A

VIII. Financial Assurance

Provide all Part B responsive information in Appendix VI. When preparing the physical format organize your submittal using the [Format of Hazardous Waste permit Application and Instructions](#).

A. Financial Assurance Information Requirements for all Applicants (30 TAC Chapter 37, Subchapter P, 305.50(a)(4)(A-E), 335.152(a)(6) and 335.179)

1. Financial Assurance for Closure

An owner or operator must establish financial assurance for the closure of the facility no later than 60 days prior to the first receipt of waste [30 TAC Section 37.31(a)]. Please refer to 30 TAC Chapter 37, Subchapter P, for the financial assurance requirements for closure and provide a signed statement from an authorized signatory per 30 TAC 305.44 regarding how the owner or operator will comply with this provision.

If a financial mechanism has been obtained, provide a copy of the mechanism.

For applications involving a permit transfer, the new owner or operator must provide a financial assurance mechanism (in original form) satisfactory to the TCEQ executive director. Prior to the executive director issuing the permit modification transferring the permit, the new owner or operator must provide proof of financial assurance in compliance with 30 TAC Section 305.64 (g) and Chapter 37, Subchapter P.

2. Financial Assurance for Post-Closure Care (applicable to disposal facilities and contingent post-closure care facilities only)

An owner or operator subject to post-closure monitoring or maintenance requirements must establish financial assurance for the post-closure care of the facility no later than 60 days prior to the first receipt of waste [30 TAC Section 37.31(a)]. Please refer to 30 TAC Chapter 37, Subchapter P for the financial assurance requirements for post-closure and provide a signed statement from an authorized signatory per 30 TAC 305.44 regarding how the owner or operator will comply with this provision.

If a financial mechanism has been obtained, provide a copy of the mechanism.

For applications involving a permit transfer, the new owner or operator must provide a financial assurance mechanism (in original form) satisfactory to the TCEQ executive director. Prior to the executive director issuing the permit modification transferring the permit, the new owner or operator must provide proof of financial assurance in compliance with 30 TAC Section 305.64 (g) and Chapter 37, Subchapter P.

3. Financial Assurance for Corrective Action

An owner or operator must establish financial assurance for corrective action of the facility no later than 60 days after the permit or order requiring the corrective action financial assurance is signed by the executive director or commission [30 TAC Section 37.31(b)]. Please refer to 30 TAC Chapter 37, Subchapter P, for the financial assurance requirements for closure and provide a signed statement from an authorized signatory per 30 TAC 305.44 regarding how the owner or operator will comply with this provision and indicate below the type of financial assurance mechanism to cover corrective action for the

facility.

If a financial mechanism has been obtained, provide a copy of the mechanism.

For applications involving permit transfers, the new owner or operator must provide a financial assurance mechanism (in original form) satisfactory to the TCEQ executive director. Prior to the executive director issuing the permit modification transferring the permit, the new owner or operator must provide proof of financial assurance in compliance with 30 TAC Section 305.64 (g) and Chapter 37, Subchapter P.

4. Liability Requirements (not required for post-closure care)

All owners or operators must establish financial assurance for third party sudden liability coverage of the facility no later than 60 days prior to the first receipt of waste [30 TAC Section 37.31(a)]. Owners or operators of disposal facilities must establish financial assurance for third party sudden and nonsudden liability coverage of the facility no later than 60 days prior to the first receipt of hazardous waste. Please refer to 30 TAC Chapter 37, Subchapter P, for the financial assurance requirements for liability coverage, and provide a signed statement from an authorized signatory per 30 TAC 305.44 regarding how the owner or operator will comply with this provision.

If a financial mechanism has been obtained, provide a copy of the mechanism.

For applications involving a permit transfer, the new owner or operator must provide a financial assurance mechanism (in original form) satisfactory to the TCEQ executive director. Prior to the executive director issuing the permit modification transferring the permit, the new owner or operator must provide proof of financial assurance in compliance with 30 TAC Section 305.64 (g) and Chapter 37, Subchapter P.

B. Applicant Financial Disclosure Statements for a new permit, permit amendment, or permit modification, or permit renewal (30 TAC 305.50(a)(4))

Refer to the Supplemental Technical Information Guidance for Applicants Subject to Financial Capability Requirements, included in Section VIII.B., and the requirements listed below as you complete this section.

1. Provide information required in 30 TAC 305.50(a)(4), as applicable to the application request.
2. Complete [Table VIII.B.](#) if requesting capacity expansion or new construction.
3. For new commercial hazardous waste management facility applications, a written statement signed by an authorized signatory per 30 TAC 305.44 explaining how the applicant intends to provide emergency response financial assurance per 30 TAC 305.50(a)(12)(C) or (D).
4. For renewal applications with no capacity expansion, please complete and submit the attached Financial Disclosure Letter.

Information for Applicants Subject to Financial Capability Requirements

Certain applications involving Hazardous Waste facilities are subject to review of the applicant's financial ability to construct, operate, and/or close the facility, perform post-closure care and corrective action at the facility in accordance with State law as specified in

Section 361.085 of the Texas Health and Safety Code. TCEQ refers to these reviews as financial capability reviews. This document summarizes and clarifies the information required in an application to meet the TCEQ requirements of 30 Texas Administrative Code (TAC) 305.50.

Information requirements vary depending on the type of financial information available to applicants, primarily whether audited financial statements are available as well as the type of application submitted. For each scenario described below, financial information must be provided for the specific applicant.

I. New Facilities, Facility Expansions and Permit Transfers

A. Publicly traded Entities

1. Securities and Exchange Commission (SEC) Form 10-Ks

This portion of the requirement calls for the two most recent 10-K reports filed.

2. SEC Form 10-Q

This portion of the requirement calls for a copy of the most recent quarterly report.

3. Explanation statement

This portion of the requirement calls for a statement signed by an authorized signatory [as described in 30 TAC 305.44(a)] explaining in detail how the applicant demonstrates sufficient financial resources to construct, safely operate, properly close, perform post-closure care, perform corrective action and provide adequate liability coverage for the facility. This statement must also address how the closure, post-closure, corrective action, and liability coverage financial assurance requirements of Chapter 37, Subchapter P will be met. (ie. which financial assurance mechanism is or will be used).

4. Construction capital cost estimates

This portion of the requirement calls for estimates of capital costs for expansion and/or initial construction if the application encompasses facility expansion, capacity expansion, or new construction.

B. Privately held entities with audited financial statements

1. Audited financial statements

This portion of the requirement calls for complete copies of the audited financial statements for each of the most recent two fiscal years. If an audit has not been completed for one of the previous two years, a complete copy of the fiscal year end financial statement and federal tax return may be substituted in lieu of the audit not performed. The tax return must be certified by original signature of an authorized signatory as being a "true and correct copy of the return filed with the Internal Revenue Service." Financial statements must be prepared consistent with generally accepted accounting principles and include a balance sheet, income statement, cash flow statement, notes to the financial statement, and an accountant's opinion letter.

2. Quarterly financial statement

This portion of the requirement calls for a complete copy of the most current quarterly financial statement prepared consistent with generally accepted accounting principles. Internally prepared statements are satisfactory.

3. Supplementary information statement

This portion of the requirement calls for a written statement detailing the information that would normally be found in SEC's Form 10-K including descriptions of the business and its operations; identification of any affiliated relationships; credit agreements and terms; any legal proceedings involving the applicant; contingent liabilities; and significant accounting policies.

4. Construction capital cost estimates

This portion of the requirement calls for estimates of capital costs for expansion and/or initial construction if the application encompasses facility expansion, capacity expansion, or new construction.

5. Explanation statement

This portion of the requirement calls for a statement signed by an authorized signatory [as described in 30 TAC 305.44(a)] explaining in detail how the applicant demonstrates sufficient financial resources to construct, safely operate, properly close, perform post-closure care, perform corrective action and provide adequate liability coverage for the facility. This statement must also address how the closure, post-closure, corrective action, and liability coverage financial assurance requirements of Chapter 37, Subchapter P will be met (ie. which financial assurance mechanism is or will be used).

C. Entities without audited financial statements or entities choosing not to provide the information listed above

1. Financial Plan

This portion of the requirement calls for a financial plan (including balance sheets listing assets, liabilities and capital accounts) sufficiently detailed to clearly demonstrate that the applicant will be in a position to readily secure financing for construction, operation, and closure, post-closure, and corrective action if the permit is issued. At least 3 balance sheets should be included as of: a) approximately the date of the permit application, b) 12 months after any construction is completed (or assumption of operational control for a permit transfer), and c) 24 months after any construction is completed (or assumption of operational control for a permit transfer).

2. Letters of opinion

The submitted financial plan must be accompanied by original letters of opinion from two financial experts, not otherwise employed by the applicant, who have the demonstrated ability to either finance the facility or place the required financing. If the permit action sought involves construction of a new facility or expansion of an existing facility, the opinion letters must certify that financing is obtainable within 180 days of permit approval and include the time schedule contingent upon permit finality for securing the financing as well as certify the financial plan is reasonable. Even if the application does not involve a facility or capacity expansion, the opinion letters must certify that the financial plan is reasonable. Only one opinion letter from a financial expert, not otherwise employed by the applicant, is required if the letter renders a firm commitment to provide all the necessary financing.

Letters of opinion are usually issued by investment or commercial bankers but there could be additional sources. Applicants are encouraged to verify the adequacy of the credentials of their chosen financial expert with TCEQ's financial assurance unit prior to a formal engagement. Financial experts should describe their qualifications and disclose their independence from the applicant and/or any entity or person affiliated with the applicant.

3. Operating and cash flow statement

This portion of the requirement calls for a written detail of the annual operating costs of the facility and a projected cash flow statement including the period of construction and first two years of operation. The cash flow statement must demonstrate the financial resources to meet operating costs, debt service, and provide financial assurance for closure, post-closure care, and liability coverage requirements. A list of the assumptions made to forecast cash flow must also be provided.

4. Explanation statement

This portion of the requirement calls for a statement addressing how the closure, post-closure, corrective action, and liability coverage financial assurance requirements of Chapter 37, Subchapter P will be met (ie. which financial assurance mechanism is or will be used).

5. Construction capital cost estimates

This portion of the requirement calls for estimates of capital costs for expansion and/or initial construction if the application encompasses facility expansion, capacity expansion, or new construction.

D. Entities with a resolution from a governing body approving or agreeing to approve the issuance of bonds to satisfy financial assurance requirements (e.g. a city or county)

1. Explanation statement

This portion of the requirement calls for a statement signed by an authorized signatory [as described in 30 TAC30 305.44(a)] explaining in detail how the applicant demonstrates sufficient financial resources to construct, safely operate, properly close, perform post-closure, perform corrective action and provide adequate liability coverage for the facility. This statement must also address how the closure, post-closure, corrective action, and liability coverage

financial assurance requirements of Chapter 37, Subchapter P will be met (ie. which financial assurance mechanism is or will be used).

2. Certified copy of the resolution from the governing body.
3. Certification by the governing body of passage of the resolution.

II. Permit Renewals

Complete the [Financial Disclosure Letter](#) letter with applicable information inserted into the parentheses. *Note that additional information must be provided if requested by TCEQ.*

Table VIII.B. - Estimated Capital Costs

Task	Cost
Site preparation, fencing, paving, curbing, lighting, roadways	
Foundations, buildings, other structures, utilities and connections, drainage system, HVAC system, electrical system, wastewater system	
Process and control equipment	
Auxiliary equipment, including but not limited to exhaust hoods fans, ducting, pumps, piping, conveyors, stacks, storage tanks, process tanks, waste disposal facilities, pollution control equipment, and fire protection system	
Process integration and instrumentation	
Emergency response equipment	
Transportation equipment	
Office equipment	
Engineering design, supervision, overhead	
Construction expenses including permits, insurance, temporary facilities, and clean-up	
Contractor's fees and overhead	
Contingency	
Total Cost	



Marathon Petroleum Company LP

539 South Main Street
Findlay, OH 45840
Tel: 419.422.2121

March 18, 2025

Executive Director
Texas Commission on Environmental Quality
Attn: Mark Stoebner, MC-184
12100 Park 35 Circle
Austin, TX 78753

RE: Blanchard Refining Company LLC
Site IDs: SWR No. 34507
WDW Nos. 80, 127 and 128

Enclosed, please find Blanchard Refining Company LLC's (Blanchard), a subsidiary of Marathon Petroleum Company LP, annual update to the financial assurance documentation required by 30 Texas Administrative Code (TAC) Chapter 37 Subchapters B and C for Closure, Post Closure, and Corrective Action, Subchapters E and F for Liability Coverage, and Subchapter Q for Underground Injection Control Wells for the permitted facilities identified above. Blanchard is providing financial assurance for liability coverage and closure and post-closure requirements.

Please find enclosed the following documents:

1. Letter from Chief Financial Officer (CFO)
2. Letter from CFO regarding Substantial Business Relationship (SBR)
3. Marathon Petroleum Corporation Guarantee on behalf of Blanchard Refining Company LLC (2 guarantees enclosed)
4. Exhibit A – List of all Liability Requirements
5. The special report from the independent Certified Public Accountant (CPA)
6. Marathon Petroleum Corporation Annual Report/Form 10-K Financial Statements

Should you need any additional information or have any questions, please don't hesitate to contact me.

Kind regards,

A handwritten signature in blue ink, appearing to read 'Mike Bracey', written over a white background.

Mike Bracey
Manager of Remediation and Waste
Environmental, Safety, Security and Product Quality
419.421.4517

A solid black rectangular redaction box covering the bottom portion of the page.



John J. Quaid

Executive Vice President and Chief Financial Officer

Marathon Petroleum Corporation

539 South Main Street
Findlay, OH 45840
Tel: 419.421.2558
jjquaid@marathonpetroleum.com

March 18, 2025

Executive Director
Texas Commission on Environmental Quality
Attn: Mark Stoebner, MC-184
12100 Park 35 Circle
Austin, TX 78753

RE: Blanchard Refining Company LLC
Site IDs: SWR No. 34507
WDW Nos. 80, 127 and 128

Dear Mr. Stoebner:

I am the Executive Vice President and CFO of Marathon Petroleum Corporation, 539 South Main Street, Findlay, Ohio 45840. This letter is to be used to attest to the fact that there have been no changes with the substantial business relationship that Marathon Petroleum Corporation has with Blanchard Refining Company LLC.

As part of our filing in 2016, per the requirements of 30 Texas Admin. Code, 37.261(d), we submitted the following documentation:

- A description of the substantial business relationship and the value received in consideration of the guarantee;
- A certified original copy of the Resolution by the Board of Directors authorizing the corporate guarantee on behalf of the entity and authorizing the formation or acquisition of the guaranteed entity;
- An organizational chart which showed the relationship between the two entities; and
- The partnership agreement which set out the formation, structure, and operation of the guaranteed entity.

Please be advised that Marathon Petroleum Corporation undertook certain internal reorganizations in 2023 which modified the organization of Blanchard Refining Company LLC but do not impact Marathon Petroleum Corporation's status as the ultimate parent corporation of Blanchard Refining Company LLC.

We understand that no additional information is necessary for our submission for the Fiscal Year ending 2024 since there has been no change with the substantial business relationship that Marathon Petroleum Corporation has with Blanchard Refining Company LLC which would impact Marathon Petroleum Corporation's ability to provide the enclosed corporate guarantees on behalf of Blanchard Refining Company LLC.

Sincerely,

A handwritten signature in black ink that reads "John J. Quaid". The signature is written in a cursive, flowing style.

John J. Quaid
Executive Vice President and CFO





John J. Quaid

Executive Vice President and Chief Financial Officer

Marathon Petroleum Corporation

539 South Main Street

Findlay, OH 45840

Tel: 419.421.2558

March 18, 2025

Executive Director
Texas Commission on Environmental Quality
Attn: Mark Stuebner, MC-184
12100 Park 35 Circle
Austin, TX 78753

RE: FINANCIAL TEST FOR LIABILITY
LETTER FROM CHIEF FINANCIAL OFFICER
Blanchard Refining Company LLC
Site IDs: SWR No. 34507
WDW Nos. 80, 127 and 128

Dear Mr. Stuebner:

I am the Chief Financial Officer of Marathon Petroleum Corporation, 539 South Main Street, Findlay, Ohio 45840. This letter is in support of the use of the financial test to demonstrate financial responsibility for liability coverage and closure and post-closure, or corrective action as specified in 30 Texas Administrative Code (TAC) Chapter 37 (relating to Financial Assurance).

The firm identified above is the owner or operator of the following facilities for which liability coverage for sudden and non-sudden accidental occurrences is being demonstrated through the financial test specified in 30 TAC §37.541: None.

The firm identified above guarantees, through the guarantee specified in 30 TAC §37.551 (relating to Corporate Guarantee for Liability), liability coverage for sudden and non-sudden accidental occurrences at the following facilities owned or operated by the following:

Blanchard Refining Company LLC
2401 5th Avenue South
Texas City, Texas
SWR No. 34507

Sudden and non-sudden accidental occurrences - \$4 million occurrence/\$8 million aggregate

Blanchard Refining Company LLC
2401 5th Avenue South
Texas City, Texas
UIC: WDW80; WDW127 and WDW128

Sudden and non-sudden accidental occurrences - \$4 million occurrence/\$8 million aggregate

The firm identified above is engaged in a substantial business relationship with the owner or operator.

1. The firm identified above owns or operates the following facilities in Texas for which financial assurance for closure, post closure, or corrective action, or liability coverage is demonstrated through a financial test specified in 30 TAC Chapter 37. The current cost estimates covered by the test are shown for each facility: None
2. The firm identified above guarantees, through a corporate guarantee specified in 30 TAC Chapter 37, the cost for closure, post closure, corrective action, or liability coverage of the following facilities owned or operated by the guaranteed party. The current cost estimates so guaranteed are shown for each facility:

Blanchard Refining Company LLC
2401 5th Avenue South, Texas City, Texas
SWR No. 34507

Closure - \$22,528,000
Post-Closure - \$16,998,400

Blanchard Refining Company LLC
2401 5th Avenue South, Texas City, Texas
UIC: WDW80 - Closure amount - \$591,666
UIC: WDW127 - Closure amount - \$575,139
UIC: WDW128 - Closure amount - \$570,690

3. In States where TCEQ is not administering the financial requirements of 30 TAC Chapter 37, this firm, as owner, operator, or guarantor, is demonstrating financial assurance for the closure, post closure, or corrective action of the following facilities through the use of a test equivalent to a financial test specified in 30 TAC Chapter 37. The current cost estimates covered by such a test are shown for each facility:

Marathon Petroleum Company LP, Garyville Refinery
Route No. 61, Garyville, LA 70051
Site ID: GD-095-0981
Closure amount - \$2,760,826

Marathon Petroleum Company LP, Robinson Illinois Refinery
Robinson Office Building, 400 S. Marathon Ave. Robinson, Illinois 62454
EPA ID No. - ILD005476882
Closure amount - \$4,952,322
Post-closure amount - \$8,271,108

Tesoro Refining & Marketing Company LLC, Martinez Renewable Fuels Facility
150 Solano Way, Martinez, CA 94553

EPA ID No. - CAR 000091488
Closure Cost Estimate - \$331,355

Tesoro Refining & Marketing Company LLC, Martinez Renewable Fuels Facility
150 Solano Way, Martinez, CA 94553
EPA ID No. - CAD 000072751
Post-Closure Cost Estimate - \$4,061,014

Tesoro Refining & Marketing Company LLC, Martinez Renewable Fuels Facility
150 Solano Way, Martinez, CA 94553
WDR Order No. R2-2004-0056
Closure, Post-Closure, & Corrective Action Cost Estimate: \$130,571,880

Tesoro Refining & Marketing Company LLC, Martinez Renewable Fuels Project
150 Solano Way, Martinez, CA 94553
County File No. CDLP20-02046
Closure Cost Estimate: \$174,993,682

Tesoro Refining & Marketing Company LLC, Los Angeles Refinery - Wilmington Operations
2101 E. Pacific Highway, Wilmington, CA 90744
EPA ID No. - CAD 041520644
Post-Closure Cost Estimate - \$1,856,765

Tesoro Refining & Marketing Company LLC, Los Angeles Refinery - Carson Operations
1801 Sepulveda, Carson, CA 90749
EPA ID No. - CAD077227049
Post-Closure Cost Estimate - \$12,045,215
Corrective Action Cost Estimate - \$24,882,174

Western Refining Southwest LLC, Gallup Refinery
I-40 Exit 39, Jamestown, New Mexico 87347 (facility address)
92 Giant Crossing Road, Gallup, New Mexico 87301 (mailing address)
EPA ID No. - NMD000333211
Closure, Post-Closure, and Corrective Action Cost Estimate - \$16,628,880

Western Refining Southwest LLC, Bloomfield Terminal
50 Road 4990, Bloomfield, New Mexico 87413 (facility address)
P.O. Box 159, Bloomfield, New Mexico 87413 (mailing address)
EPA ID No. - NMD089416416
Closure Cost Estimate - \$4,561,876

Tesoro Alaska Company LLC, Kenai Refinery
54741 Tesoro Road, PO Box 3369, Kenai, AK 99611-3369
EPA ID No. - AKD 048679682
Corrective Action Cost Estimate - \$10,240,349 (SWMUs)
Post-closure Cost Estimate - \$2,488,056 (Regulated Units)

Tesoro Refining & Marketing Company LLC, Mandan Refinery

900 Old Red Trail NE, Mandan, North Dakota 58554
EPA ID No. - NDD 006175467
Closure Cost Estimate - \$753,243

Tesoro Refining & Marketing Company LLC, Mandan Refinery
900 Old Red Trail NE, Mandan, North Dakota 58554
Permit # HW-002
Corrective Action Cost Estimate - \$2,811,935

Tesoro Refining & Marketing Company LLC, Mandan Refinery
900 Old Red Trail NE, Mandan, North Dakota 58554
Permit # ID-037
Closure Cost Estimate - \$1,022,532
Post-Closure Estimate - \$884,315

4. The firm identified above owns or operates the following facilities for which financial assurance for closure, post closure, or corrective action, is not demonstrated either to TCEQ, a federal agency or a State through the financial test or any other financial assurance mechanisms specified in 30 TAC Chapter 37 or equivalent State mechanisms. The current cost estimates not covered by such financial assurance are shown for each facility: None.
5. The firm is the owner or operator or guarantor of the following facilities for which financial assurance is being demonstrated under other EPA regulations or state programs authorized by EPA through a financial test or guarantee. The following amounts have not been included in Paragraphs 1 through 4.

- (a) Municipal solid waste management facilities under
30 TAC Chapter 330, 40 CFR part 258 or equivalent \$0_____
- (b) Underground injection control facilities under 30 TAC
Chapter 331, 40 CFR part 144 or equivalent \$ 464,023

Tesoro Refining & Marketing Company LLC, Mandan Refinery
900 Old Red Trail NE, Mandan, North Dakota 58554

EPA ID No. - NDD 006175467 - Mandan, ND Injection Well No. 1 Closure - \$250,323
EPA ID No. - NDD006175467 - Mandan, ND Injection Well No. 1 Post closure - \$5,000
EPA ID No. - NDD 006175467 - Mandan, ND Injection Well No. 2 Closure - \$203,700
EPA ID No. - NDD 006175467 - Mandan, ND Injection Well No. 2 Post closure - \$5,000

- (c) Petroleum underground storage tank facilities under
30 TAC Chapter 334, and 40 CFR part 280 or equivalent \$0.00 _____
- (d) PCB storage facilities under 40 CFR part 761 or equivalent \$0.00 _____
- (e) Hazardous waste treatment, storage, and disposal facilities
Under 30 TAC Chapter 335, 40 CFR parts 264 and 265
or equivalent \$0.00 _____

(f) Additional environmental obligations not shown above \$546,103,796

Alaska Dept of Environmental Conservation, Division of Spill Prevention and Response
Andeavor LLC / Tesoro Alaska Company LLC, Kenai, Alaska facility
54741 Energy Wy, Kenai, AK 99611
Spill Response Requirement - \$334,350,000

Alaska Dept of Environmental Conservation, Division of Spill Prevention and Response
Marathon Petroleum Company LP/Tesoro Alaska Company LLC, Kenai, Alaska facility
54741 Energy Wy, Kenai, AK 99611
Spill Response Requirement - \$111,450,000

California Department of Fish and Wildlife, Office of Spill Prevention and Response
Tesoro Refining & Marketing Company LLC, Los Angeles, California facility
1801 Sepulveda, Carson, CA 90749
Self-insurance for Oil Spill Response and Damages - \$48,500,000

Illinois Environmental Protection Agency - Marathon Petroleum Company LP
Robinson Illinois Refinery
400 S. Marathon Ave. Robinson, Illinois 62454
EPA ID No. - ILD005476882
Liability Requirement - \$8,000,000

Western Refining Southwest LLC, Gallup Refinery
I-40 Exit 39, Jamestown, New Mexico 87347 (facility address)
92 Giant Crossing Road, Gallup, New Mexico 87301 (mailing address)
EPA ID No. - NMD000333211
Liability Requirement - \$8,000,000

Western Refining Southwest LLC, Bloomfield Terminal
50 Road 4990, Bloomfield, New Mexico 87413 (facility address)
P.O. Box 159, Bloomfield, New Mexico 87413 (mailing address)
EPA ID No. - NMD089416416
Liability Requirement - \$8,000,000

Tesoro Refining & Marketing Company LLC, Mandan Refinery
900 Old Red Trail NE, Mandan, North Dakota 58554
EPA ID No. - NDD 006175467
Liability Requirement - \$8,000,000

Tesoro Refining & Marketing Company LLC, Mandan Refinery
900 Old Red Trail NE, Mandan, North Dakota 58554
Permit # HW-002
Liability Requirement - \$8,000,000

Tesoro Refining & Marketing Company LLC, Mandan Refinery
900 Old Red Trail NE, Mandan, North Dakota 58554

Permit # ID-037
Liability Requirement - \$8,000,000

Florida Department of Environmental Protection - Marathon Petroleum Company LP Tampa
Asphalt Terminal
425 South 20th Street Tampa, Fl 33605
Liability Requirement - \$1,000,000

Tesoro Refining & Marketing Company L.L.C, Anacortes Refinery
10200 West March Point Road, Anacortes, Washington 98221
Limited Purpose Landfill
Closure Site #2 - \$1,661,748
Post-Closure Site #2 - \$1,142,048

Total (a) - (f) \$ 546,567,819

This guarantor has not received an adverse opinion, a disclaimer of opinion, or a going concern qualification from an independent auditor on its financial statements for the latest completed fiscal year.

This firm is required to file a Form 10K with the Securities and Exchange Commission (SEC) for the latest fiscal year. The fiscal year of this firm ends on December 31. The figures for the following items marked with an asterisk are derived from this firm's independently audited, year-end financial statements for the latest completed fiscal year, ended December 31, 2024.

Part B: Closure, Post Closure, Corrective Action, and Liability Coverage

ALTERNATIVE II

- | | | |
|-----|---|--------------------------|
| 1. | Sum of current closure, post-closure, and corrective action cost estimates (total of all cost estimates listed above) | <u>\$ 942,949,241</u> |
| 2. | Amount of annual aggregate liability coverage to be Demonstrated (See Exhibit A) | <u>\$ 57,000,000</u> |
| 3. | Sum of lines 1 and 2 | <u>\$ 999,949,241</u> |
| 4. | Current bond rating of most recent issuance and name of the rating service | <u>BBB S&P</u> |
| 5. | Date of issuance of bond | <u>April 27, 2020</u> |
| 6. | Date of maturity of bond | <u>May 1, 2025</u> |
| *7. | Tangible net worth (if any portion of the current cost estimate is included in total liabilities you may add that portion to this line) | <u>\$ 14,488,000,000</u> |

*8. Total assets in U.S. (Required only if less than 90 percent assets are located in the U.S.) \$ 77,242,000,000

Indicate either "yes" or "no" to the following questions:

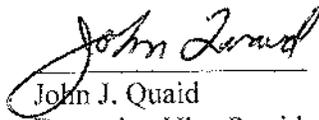
9. Is line 7 at least \$10 million? YES

10. Is line 7 at least 6 times line 3? YES

*11. Are at least 90 percent of assets located in the U.S.?
(If not, complete line 12) YES

12. Is line 8 at least 6 times line 3? YES

I hereby certify that the wording of this letter is identical to the wording specified in 30 TAC §37.651 as such regulations were constituted on the date shown immediately below.


John J. Quaid
Executive Vice President and CFO

March 18, 2025



**TEXAS COMMISSION ON ENVIRONMENTAL QUALITY
CORPORATE GUARANTEE**

Blanchard Refining Company LLC
2401 5th Avenue South
Texas City, TX 77590
Site ID: TXD 072181381

Guarantee made this 18th day of March 2025 by Marathon Petroleum Corporation, a business corporation organized under the laws of the State of Delaware, herein referred to as guarantor. This guarantee is made to the Texas Commission on Environmental Quality (TCEQ) on behalf of Blanchard Refining Company LLC of 2401 5th Avenue South, Texas City, Texas 77590, which is an entity with which guarantor has a substantial business relationship, as defined in 30 TAC §37.11 (relating to Definitions).

RECITALS

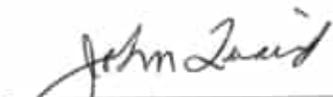
1. Guarantor meets or exceeds the financial test criteria and agrees to comply with the reporting requirements for guarantors as specified in 30 Texas Administrative Code (TAC) §37.251 (relating to Financial Test) and §37.261 (relating to Corporate Guarantee).
2. Blanchard Refining Company LLC owns or operates the following facility(ies) covered by this guarantee:
 - Blanchard Refining Company LLC, SWR No. 34507, Closure/Post-Closure
2401 5th Avenue South, Texas City, Texas 77590
 - Blanchard Refining Company LLC, WDW80 Closure, WDW 127 Closure, WDW 128
Closure
2401 5th Avenue South, Texas City, Texas 77590
3. "Closure or post closure plans" as used below refer to the plans maintained as required for the closure or post closure of the facilities as identified above.
4. For value received from Blanchard Refining Company LLC, for \$1.00 and other valuable goods as consideration, guarantor guarantees to TCEQ that in the event that Blanchard Refining Company LLC fails to perform closure, post closure, or corrective action of the above facility(ies) in accordance with the closure plans, post closure plans, or corrective action, permits, and other applicable requirements whenever required to do so, the guarantor shall do so or establish a trust fund as specified in 30 TAC §37.201 (relating to Trust Fund), in the name of Blanchard Refining Company LLC in the amount of the current cost estimate.
5. Guarantor agrees that if, at the end of any fiscal year before termination of this guarantee, the guarantor fails to meet the financial test criteria, guarantor shall send within 90 days, by certified mail, notice to the TCEQ executive director and to Blanchard Refining Company LLC that the guarantor intends to provide alternate financial assurance as specified in 30 TAC Chapter 37 (relating to Financial Assurance), as applicable, in the name of Blanchard Refining Company LLC. Within 120 days after the end of such fiscal year, the guarantor shall establish such financial assurance unless Blanchard Refining Company LLC has done so.
6. The guarantor agrees to notify the TCEQ executive director by certified mail, of a voluntary or involuntary proceeding under Title 11 (Bankruptcy), U.S. Code, naming guarantor as debtor, within 10 days after commencement of the proceeding.

7. Guarantor agrees that within 30 days after being notified by the TCEQ executive director of a determination that guarantor no longer meets the financial test criteria or is disallowed from continuing as a guarantor of closure, post closure, or corrective action, guarantor shall establish alternate financial assurance as specified in Subchapter C of 30 TAC Chapter 37 (relating to Financial Assurance Mechanisms for Closure, Post Closure, and Corrective Action), in the name of Blanchard Refining Company LLC unless Blanchard Refining Company LLC has done so.
8. Guarantor agrees to remain bound under this guarantee notwithstanding any or all of the following: amendment or modification of the closure or post closure plans, or corrective action requirements, amendment or modification of the permit, the extension or reduction of the time of performance, or any other modification or alteration of an obligation of the owner or operator.
9. Guarantor agrees to remain bound under this guarantee for so long as Blanchard Refining Company LLC must comply with the applicable financial assurance requirements of 30 TAC Chapter 37 for the above-listed facilities, except as provided in paragraph 10 of this agreement.
10. Guarantor may terminate this guarantee by sending notice by certified mail to the TCEQ executive director and to Blanchard Refining Company LLC, provided that this guarantee may not be terminated unless and until Blanchard Refining Company LLC obtains, and the TCEQ executive director approves, alternate financial assurance.
11. Guarantor agrees that if Blanchard Refining Company LLC fails to provide alternate financial assurance as specified in 30 TAC Chapter 37, as applicable, and obtain written approval of such assurance from the TCEQ executive director within 90 days after a notice of termination by the guarantor is received by the TCEQ executive director from guarantor, guarantor shall provide such alternate financial assurance in the name of the Blanchard Refining Company LLC.
12. Guarantor expressly waives notice of acceptance of this guarantee by the TCEQ or by Blanchard Refining Company LLC. Guarantor also expressly waives notice of amendments or modifications of the closure plans, post closure plans, or corrective action requirements, and of amendments or modifications of the permit(s).

I hereby certify that the wording of this guarantee is identical to the wording specified in 30 Texas Administrative Code §37.361 as such regulations were constituted on the date first above written.

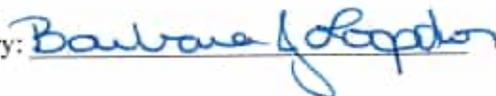
Effective date: March 18, 2025

Marathon Petroleum Corporation



 John J. Quaid
 Executive Vice President and CFO



Signature of witness or notary: 



BARBARA J LOGSDON
 Notary Public
 State of Ohio
 My Comm. Expires
 September 27, 2028

**TEXAS COMMISSION ON ENVIRONMENTAL QUALITY
CORPORATE GUARANTEE FOR LIABILITY**

Guarantee made this 18th day of March 2025 by Marathon Petroleum Corporation, a business corporation organized under the laws of the State of Delaware, herein referred to as guarantor. This guarantee is made on behalf of Blanchard Refining Company LLC of 2401 5th Avenue South, Texas City, TX 77590, which is an entity with which guarantor has a substantial business relationship as defined in 30 TAC §37.11 (relating to Definitions), to any and all third parties who have sustained or may sustain bodily injury or property damage caused by sudden and/or non-sudden accidental occurrences arising from operation of the facility(ies) covered by this guarantee.

RECITALS

1. Guarantor meets or exceeds the financial test criteria and agrees to comply with the reporting requirements for guarantors as specified in 30 Texas Administrative Code (TAC) §37.541 (relating to Financial Test for Liability) and §37.551 (relating to Corporate Guarantee for Liability).
2. Blanchard Refining Company LLC owns or operates the following facility(ies) covered by this guarantee: Blanchard Refining Company LLC, 2401 5th Avenue South, Texas City, Texas 77590; SWR No. 34507, WDW80, WDW127, WDW128. This corporate guarantee satisfies third-party liability requirements for sudden and/or non-sudden accidental occurrences in above-named owner or operator facilities for coverage in the amount of \$4 million for each occurrence and \$8 million annual aggregate.
3. For value received from Blanchard Refining Company LLC, guarantor guarantees to any and all third parties who have sustained or may sustain bodily injury or property damage caused by sudden and/or non-sudden accidental occurrences arising from operations of the facility(ies) covered by this guarantee that in the event that Blanchard Refining Company LLC fails to satisfy a judgment or award based on a determination of liability for bodily injury or property damage to third parties caused by sudden and/or non-sudden accidental occurrences, arising from the operation of the above-named facilities, or fails to pay an amount agreed to in settlement of a claim arising from or alleged to arise from such injury or damage, the guarantor will satisfy such judgment(s), award(s) or settlement agreement(s) up to the limits of coverage identified above.
4. Such obligation does not apply to any of the following:
 - (a) Bodily injury or property damage for which Blanchard Refining Company LLC is obligated to pay damages by reason of the assumption of liability in a contract or agreement. This exclusion does not apply to liability for damages that Blanchard Refining Company LLC would be obligated to pay in the absence of the contract or agreement.
 - (b) Any obligation of Blanchard Refining Company LLC under a workers' compensation, disability benefits, or unemployment compensation law or any similar law.
 - (c) Bodily injury to:

- (1) An employee of Blanchard Refining Company LLC arising from, and in the course of, employment by Blanchard Refining Company LLC; or
 - (2) The spouse, child, parent, brother, or sister of that employee as a consequence of, or arising from, and in the course of employment by Blanchard Refining Company LLC. This exclusion applies:
 - (A) Whether Blanchard Refining Company LLC may be liable as an employer or in any other capacity; and
 - (B) To any obligation to share damages with or repay another person who must pay damages because of the injury to persons identified in paragraphs (1) and (2).
- (d) Bodily injury or property damage arising out of the ownership, maintenance, use, or entrustment to others of any aircraft, motor vehicle or watercraft.
- (e) Property damage to:
 - (1) Any property owned, rented, or occupied by Blanchard Refining Company LLC;
 - (2) Premises that are sold, given away or abandoned by Blanchard Refining Company LLC if the property damage arises out of any part of those premises;
 - (3) Property loaned to Blanchard Refining Company LLC;
 - (4) Personal property in the care, custody or control of Blanchard Refining Company LLC;
 - (5) That particular part of real property on which Blanchard Refining Company LLC or any contractors or subcontractors working directly or indirectly on behalf of Blanchard Refining Company LLC are performing operations, if the property damage arises out of these operations.
5. Guarantor agrees that if, at the end of any fiscal year before termination of this guarantee, the guarantor fails to meet the financial test criteria, guarantor shall send within 90 days, by certified mail, notice to the TCEQ executive director and to Blanchard Refining Company LLC that guarantor intends to provide alternate liability coverage as specified in Subchapter F of 30 TAC Chapter 37 (relating to Financial Assurance Mechanisms for Liability), in the name of Blanchard Refining Company LLC. Within 120 days after the end of such fiscal year, the guarantor shall establish such liability coverage unless Blanchard Refining Company LLC has done so.
6. The guarantor agrees to notify the TCEQ executive director by certified mail of a voluntary or involuntary proceeding under title 11 (Bankruptcy), U.S. Code, naming guarantor as debtor, within 10 days after commencement of the proceeding.
7. Guarantor agrees that within 30 days after being notified by the TCEQ executive director of a determination that guarantor no longer meets the financial test criteria or is disallowed from continuing as a guarantor, guarantor shall establish alternate liability coverage as specified in Subchapter F of 30 TAC Chapter 37 in the name of Blanchard Refining Company LLC, unless Blanchard Refining Company LLC has done so.

8. Guarantor reserves the right to modify this agreement to take into account amendment or modification of the liability requirements set by Subchapter E of 30 TAC Chapter 37 (relating to Financial Assurance Requirements for Liability Coverage), provided that such modification shall become effective only if the TCEQ executive director does not disapprove the modification within 30 days of receipt of notification of the modification.
9. Guarantor agrees to remain bound under this guarantee for so long as Blanchard Refining Company LLC must comply with the applicable requirements of Subchapter E of 30 TAC Chapter 37 for the above-listed facility(ies), except as provided in Paragraph 10 of this agreement.
10. Guarantor may terminate this guarantee by sending notice by certified mail to the TCEQ executive director and to Blanchard Refining Company LLC provided that this guarantee may not be terminated unless and until Blanchard Refining Company LLC obtains, and the TCEQ executive director approves, alternate financial assurance for liability coverage complying with Subchapter F of 30 TAC Chapter 37.
11. Guarantor hereby expressly waives notice of acceptance of this guarantee by any party.
12. Guarantor agrees that this guarantee is in addition to and does not affect any other responsibility or liability of the guarantor with respect to the covered facilities.
13. The Guarantor shall satisfy a third-party liability claim only on receipt of one of the following documents:
 - (a) Certification from the Principal and the third-party claimant(s) that the liability claim should be paid. The certification must be worded as follows, except that instructions in parentheses are to be replaced with the relevant information and the parentheses deleted:

CERTIFICATION OF VALID CLAIM

The undersigned, as parties the Principal (name of principal) and (name and address of third-party claimant(s)), hereby certify that the claim of bodily injury and/or property damage caused by a (sudden and/or non-sudden) accidental occurrence arising from operating (Principal's) facility should be paid in the amount of \$ (amount).

(Signatures) _____

Principal _____

(Notary) Date _____

(Signature(s)) _____

Claimant(s) _____

(Notary) Date _____

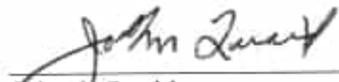
or (b) A valid final court order establishing a judgment against the Principal for bodily injury or property damage caused by (sudden and/or non-sudden) accidental occurrences arising from the operation of the Principal's facility or group of facilities.

14. In the event of combination of this guarantee with another mechanism to meet liability requirements, this guarantee will be considered primary coverage.

I hereby certify that the wording of the guarantee is identical to the wording specified in 30 TAC §37.661 as such regulations were constituted on the date shown immediately below.

Effective date: March 18, 2025

Marathon Petroleum Corporation



John J. Quaid
Executive Vice President and CFO



Signature of witness or notary: Barbara J. Logsdon



BARBARA J LOGSDON
Notary Public
State of Ohio
My Comm. Expires
September 27, 2028

Exhibit A – List of Liability Requirements

Blanchard Refining Company LLC
2401 5th Avenue South, Texas City, Texas
Liability Requirement - \$8,000,000

Illinois Environmental Protection Agency - Marathon Petroleum Company LP
Robinson Illinois Refinery
400 S. Marathon Ave. Robinson, Illinois 62454
EPA ID No. - ILD005476882
Liability Requirement - \$8,000,000

Western Refining Southwest LLC, Gallup Refinery
I-40 Exit 39, Jamestown, New Mexico 87347 (facility address)
92 Giant Crossing Road, Gallup, New Mexico 87301 (mailing address)
EPA ID No. - NMD000333211
Liability Requirement - \$8,000,000

Western Refining Southwest LLC, Bloomfield Terminal
50 Road 4990, Bloomfield, New Mexico 87413 (facility address)
P.O. Box 159, Bloomfield, New Mexico 87413 (mailing address)
EPA ID No. - NMD089416416
Liability Requirement - \$8,000,000

Tesoro Refining & Marketing Company LLC, Mandan Refinery
900 Old Red Trail NE, Mandan, North Dakota 58554
EPA ID No. - NDD 006175467
Liability Requirement - \$8,000,000

Tesoro Refining & Marketing Company LLC, Mandan Refinery
900 Old Red Trail NE, Mandan, North Dakota 58554
Permit # HW-002
Liability Requirement - \$8,000,000

Tesoro Refining & Marketing Company LLC, Mandan Refinery
900 Old Red Trail NE, Mandan, North Dakota 58554
Permit # ID-037
Liability Requirement - \$8,000,000

Florida Department of Environmental Protection - Marathon Petroleum Company LP Tampa
Asphalt Terminal
425 South 20th Street Tampa, FL 33605
Liability Requirement - \$1,000,000

Marathon Petroleum Corporation
Period Ending 12/31/2024

	MILLIONS	
TOTAL WORLDWIDE ASSETS	\$ 78,858	A
4031 (-) MARATHON TRADING & SUPPLY SERVICES LIMITED	1	B
4032 (-) MARATHON PETROLEUM PERU, S.R.L.	100	C
4503 (-) MPC CANADA, LTD.	1	D
4535 (-) MARATHON PETROLEUM CANADA TRADING & SUPPLY ULC	1,070	E
4709 (-) TESORO PETROLEUM (SINGAPORE) TOTAL ASSETS	1	F
4725 (-) TESORO MEXICO SUPPLY & MARKETING TOTAL ASSETS	420	G
4726 (-) ANDEAVOR SERVICES DE MEXICO TOTAL ASSETS	9	H
4731 (-) WESTERN REFINING DE MEXICO TOTAL ASSETS	11	I
4735 (-) COMBUSTIBLES PLAYA TOTAL ASSETS	3	J
4740 (-) MARATHON TRANSPORTE DE HIDROCARBUROS	—	K
4743 (-) MARATHON PETROLEUM MEXICO, S.DE R.I.O.DE C.	—	L
(=) TOTAL ASSETS LOCATED IN U.S.	77,242	
TOTAL WORLDWIDE CURRENT ASSETS	\$ 24,447	M
4031 (-) MARATHON TRADING & SUPPLY SERVICES LIMITED	—	N
4032 (-) MARATHON PETROLEUM PERU, S.R.L.	100	O
4503 (-) MPC CANADA, LTD.	1	P
4535 (-) MARATHON PETROLEUM CANADA TRADING & SUPPLY ULC	1,066	Q
4709 (-) TESORO PETROLEUM (SINGAPORE) CURRENT ASSETS	—	R
4725 (-) TESORO MEXICO SUPPLY & MARKETING CURRENT ASSETS	374	S
4726 (-) ANDEAVOR SERVICES DE MEXICO CURRENT ASSETS	5	T
4731 (-) WESTERN REFINING DE MEXICO CURRENT ASSETS	1	U
4735 (-) COMBUSTIBLES PLAYA CURRENT ASSETS	3	V
4740 (-) MARATHON TRANSPORTE DE HIDROCARBUROS	—	W
4743 (-) MARATHON PETROLEUM MEXICO, S.DE R.I.O.DE C.	—	X
(=) TOTAL CURRENT ASSETS LOCATED IN U.S.	\$ 22,897	
TOTAL WORLDWIDE LIABILITIES	\$ 54,352	
TOTAL WORLDWIDE CURRENT LIABILITIES	\$ 20,827	
AMOUNT BY WHICH TOTAL ASSETS, LOCATED IN THE UNITED STATES, EXCEED TOTAL (i.e. WORLDWIDE) LIABILITIES \$ 22,890		
AMOUNT BY WHICH TOTAL CURRENT ASSETS, LOCATED IN THE UNITED STATES, EXCEED TOTAL (i.e. WORLDWIDE) CURRENT LIABILITIES \$ 2,070		

Information reported above is based on Marathon Petroleum 10-K.

Marathon Petroleum Corporation
Summary of Tangible Assets
Period Ending 12/31/2024

	MILLIONS
Tangible Assets	
Net PP&E	\$ 35,028
Tangible Net Worth	
Total Shareholders Equity & Redeemable noncontrolling interest	\$ 24,506
Less Goodwill	\$ 8,244
Less Intangibles	\$ 1,774
Total Tangible Net Worth	<u>\$ 14,488</u>
Prove Above Net Worth	
Total Assets	\$ 78,858
Less Goodwill	\$ 8,244
Less Intangible	\$ 1,774
Total Tangible Assets	\$ 68,840
Less Total Liabilities	\$ 54,352
Total Tangible Net Worth	<u>\$ 14,488</u>

Information reported above is based on Marathon Petroleum 10-K.



Report of Independent Accountants

To the Management of Marathon Petroleum Corporation:

We have performed the procedures enumerated below, which were agreed to by Marathon Petroleum Corporation (the “Company,” as the engaging party) and the Texas Commission on Environmental Quality (through enacted regulations that require such procedures) (collectively referred to as “the specified parties”), solely to assist you in evaluating certain data contained in the letter from the Executive Vice President and Chief Financial Officer of the Company dated March 18, 2025, in connection with the requirements as set forth in Texas Administrative Code (TAC) Title 30, Chapter 37 (relating to Financial Assurance), specifically TAC Title 30, 37.251(c)(3) and 37.541(d)(3) (the “Requirements”). The Company is responsible for compliance with the Requirements and the data included within the letter.

In an agreed-upon procedures engagement, we perform specific procedures that the Company has agreed to and acknowledged to be appropriate for the intended purpose of the engagement and we report on findings based on the procedures performed. The procedures performed may not address all the items of interest to a user of this report and may not meet the needs of all users of this report and, as such, users are responsible for determining whether the procedures performed are appropriate for their purposes. The parties specified in this report have agreed to and acknowledged that the procedures performed are appropriate for their purposes. This report may not be suitable for any other purpose.

The procedures performed and results thereof are as follows:

1. Tangible net worth. We subtracted the dollar amount of intangible assets from the dollar amount of total stockholders’ equity (obtained from the 2024 audited consolidated financial statements and underlying accounting records of the Company). We compared this amount with the amount disclosed in the letter from the Executive Vice President and Chief Financial Officer of the Company. No differences were noted.
2. Total assets in U.S. We agreed the amount of total assets in the U.S. disclosed in the letter from the Executive Vice President and Chief Financial Officer of the Company to the Company’s underlying accounting records. No differences were noted.
3. Are at least 90% of assets located in the U.S.? We recalculated the percentage of assets located in the U.S., based upon the Company’s total U.S. assets (as obtained from the Company’s underlying accounting records) and the Company’s total consolidated assets (as disclosed in the 2024 audited consolidated financial statements of the Company). We compared our recalculated percentage with the Company’s response in the letter from the Executive Vice President and Chief Financial Officer of the Company. No exceptions were noted.

This agreed-upon procedures engagement was conducted in accordance with attestation standards established by the American Institute of Certified Public Accountants (AICPA). We were not engaged to and did not conduct an audit or an examination engagement, the objective of which would be the expression of an opinion, or a review engagement, the objective of which would be the expression of a conclusion, on the Company’s compliance with the Requirements and certain data included within the letter. Accordingly, we do not express such an opinion or conclusion. Had we performed additional procedures, other matters might have come to our attention that would have been reported to you.



In performing this engagement, we are required to be independent of the Company and to meet our ethical responsibilities, in accordance with the relevant ethical requirements related to our agreed-upon procedures engagement.

This report is intended solely for the information and use of the specified parties, for purposes of satisfying the Requirements, and is not intended to be and should not be used by anyone other than these specified parties.

PricewaterhouseCoopers LLP

March 20, 2025

XII. Hazardous Waste Permit Application Fee

Provide all Part B responsive information in Appendix XII. When preparing the physical format organize your submittal using the [Format of Hazardous Waste permit Application and Instructions](#).

In accordance with 30 TAC 305.53, complete [Tables XII.A.](#) - Hazardous Waste Units (For Application Fee Calculations) and XII.B. - Hazardous Waste Permit Application Fee Worksheet. Use the following information in calculating your fee. The application fee will be non-refundable once an initial review of the application has been completed. The applicant's fees are subject to evaluation by the technical staff of the Texas Commission on Environmental Quality (TCEQ). However, the TCEQ reserves the right to assess further fees as may be necessary.

- A. The minimum permit application fee for a permit or a permit renewal for each hazardous waste facility to be used for Storage, Processing, Disposal, or Closure/Post-Closure Care (disposal has already occurred) of hazardous waste shall be \$2,000, plus notice fee, and the maximum shall be \$50,000, calculated according to these instructions:
 1. Process Analysis - \$1,000.00.
 2. Management/Facility Analysis - \$500.00.
 3. A facility unit(s) analysis of \$500 per unit is charged for the following:
 - a. each cell of a landfill (note that multiple cells that are identical in type and use are subject to a single \$500 fee);
 - b. tanks and container storage areas (note that multiple tanks and container storage areas that are identical in type and use are subject to a single \$500 fee)
 - c. identical in type and use means the following:
 - (1) made of the same material and same design;
 - (2) the same size/capacity within + 10%;
 - (3) store the same waste (as identified by USEPA hazardous waste number - 40 CFR 261 Subparts C & D); and
 - (4) have the same management characteristics (e.g., storage only).
 - d. Each incinerator, boiler/industrial furnace unit, surface impoundment, waste pile, land treatment unit, drip pad, miscellaneous unit, or containment building.
 4. Site Evaluation - \$100 per acre of surface used for hazardous waste management up to 300 acres. No additional fee thereafter. This shall be calculated as any acreage which will be permitted to manage hazardous waste. This shall include, for example, the entire area within the secondary containment of a tank farm, the area within a fence that surrounds individual units (other than the facility fence), or the area defined by the toe of the dike surrounding a landfill or impoundment, etc.
 5. An applicant shall also include with each initial application a fee of \$50 to be applied toward the cost of providing the required notice. An additional notice

fee of \$15 is required with each application for renewal.

- B. The application fee for a major amendment or a Class 2 or 3 modification to a hazardous waste permit for operation, closure, or post-closure care is subject to the fees listed below:
1. A management/facility analysis fee of \$500.
 2. The notice fee is \$50.
 3. If a unit is added or a unit area is expanded for any purpose, \$100 per additional acre is assessed, until the total additional acreage reaches 300 acres.
 4. If one or more of the following reports are added or are significantly revised, the process analysis fee of \$1000 is assessed:
 - a. waste analysis plan;
 - b. site-specific or regional geology report;
 - c. site-specific or regional geohydrology report;
 - d. groundwater and/or unsaturated zone monitoring;
 - e. closure and/or post-closure care plan; or
 - f. RCRA Facility Assessments (RFAs), or corrective action reports;
 - g. Alternate Concentration Limit (ACL) demonstration or Development of Protective Concentration Limits (PCLs);
 - h. Regulated Unit Facility Assessment, Corrective Action (CA) work plans or reports for Regulated Units; and/or
 - i. RCRA Facility Investigation (RFI)/Affected Property Assessment (APA), Remedy Selection, Corrective Measure Implementation (CMI)/Remedial Action Plan for solid waste management units, and/or areas of concern;
 - j. Facility Operations Area (FOA).
 5. A unit analysis fee of \$500 per unit is assessed if any of the following occur:
 - a. if a unit is added (even if identical to units already in place, using the criteria discussed in A.3 above);
 - b. if there are design changes in an existing unit; or
 - c. if a unit status changes from closure to post-closure care;
 - d. Changes in the number, location, depth, or design of wells approved in compliance plan or a permit (unless it is a replacement well);
 - e. Changes in point of compliance and compliance monitoring program;
 - f. Changes in Groundwater Protection Standards, indicator parameters, Alternate Concentration Limits or Protective Concentration Limits; and/or
 - g. Changes in corrective action program.
- C. The application fee for a minor amendment, a Class 1, or a Class 1¹ modification of a

hazardous waste permit is \$100 plus the notice fee of \$50.

Table XII.A. - Hazardous Waste Units (For Application Fee Calculations)

Verbal Description of Unit	Rated Capacity	Surface Acreage ¹	# of Unit Types ²	Identical Unit Justification ³
		56	1	
		Total ⁴	Total ⁴	56

1. Number of calculated acres.
2. Enter number of units except for units identical in type and use which only count toward a single \$500.00 fee.
3. Explain justification for any units claimed as identical in type and use.
4. Enter these totals on the worksheet.

Table XII.B. - Hazardous Waste Permit Application Fee Worksheet

Name of Facility: Blanchard Refining Company LLC - Land Treatment Facility

Solid Waste Registration Number: 34507

1. Process Analysis - \$1,000.....	\$	<u>1,000</u>
2. Facility Management Analysis - \$500.....	\$	<u>500</u>
3. Unit Analysis - <u>1</u> units @ \$500 per unit.....	\$	<u>500</u>
4. Site Evaluation - <u>56</u> acres @ \$100 per acre.....	\$	<u>5,600</u>
(Maximum of 300 acres)		
5. Minor amendment, Class 1, or Class 1 ¹ modification - \$100.....	\$	<u> </u>
6. Cost of Providing Notice - \$50 (+ \$15 for a renewal).....	\$	<u>50</u>

Pay This Amount **Total** \$ 7,650

Pay Online through ePay portal www3.tceq.texas.gov/epay/

Enter ePay Trace Number: _____

For Payment by check, make checks Payable To:

Texas Commission on Environmental Quality - Fund 549
(*your canceled check will be your receipt*)

Complete And Return With Payment To:

Texas Commission on Environmental Quality
Financial Administration Division - MC 214
P.O. BOX 13088
Austin, Texas 78711-3088

The applicant's fees are subject to evaluation by the technical staff of the Texas Commission on Environmental Quality (TCEQ). However, the TCEQ reserves the right to assess further fees as may be necessitated.

Please do not submit a photocopy of the check (or equivalent transaction submittal) with your application packet but provide only the following account information:

Check No.	Date of Check	Check Amount